10 September 2022

Shelli Mavor, Project Leader

Swan Lake Ranger District

200 Ranger Station Road

Bigfork, MT 59911

Dear Ms. Shelli Mavor,

Thank you for the opportunity to submit comments and learn more about the Holland Lake Lodge Expansion Project in the September 8 open house. I am writing to oppose this project as described in POWDR’s Master Development Plan (MDP).

I am concerned with the increased extent and intensity of human use as suggested in the MDP. The expanded human footprint will represent a substantial departure from current conditions, and the accumulation of such dramatic changes warrant a comprehensive, thorough environmental impact statement. A categorical exclusion for this project would overlook many important ecological, economic, and ethical concerns, not only the obvious changes in the built environment, but also consequential externalities associated with increased use. The core issues I see include but are not limited to:

**This project increases the risk for Threatened, Endangered, and Sensitive species.** The habitat in, around, and near Holland Lake is vital to many species protected at the state and federal level. Holland Lake and Creek is designated as critical habitat for bull trout, the surrounding lands are designated as critical habitat for Canada lynx, and – contrary to the statements on MDP 7.4 – grizzly bears are very active in the area. Each of these species is listed as Threatened under the Endangered Species Act (ESA). Other species, like the wolverine, are deserving candidates for ESA listing and also depend on habitats nearby. And even more local species – such as the northern goshawk, common loon, black swift, or western toad, to name a few – are noted as Sensitive, Species of Concern, or both. Black swifts and common loons are of particular relevance around Holland Lake, and their specialized nesting requirements and low toleration for human disturbance makes them highly vulnerable to extirpation. Holland Lake also hosts an important source population of the North American beaver (a keystone species), and unique occurrences like the white glacier lily. Given the diverse, cumulative pressures this project could place on the protected and unique species of the area, I urge a more thorough consideration of the effects and mitigation needs beyond those mentioned in MDP Section 7.1.2.

**Connectivity and function of habitat could suffer from this project if more detailed planning is not demonstrated.** Even for the species that are not protected or particularly unique, this project has the potential to threaten the quality and integrity of habitat. A 20-foot buffer from the lake is incredibly minimal, and especially if some of the trees and vegetation are removed near that distance, I would be concerned about erosion and the loss of shoreline habitat. Vehicle speed has increased significantly on the Holland Lake Road since it was paved, and I’m sure its frequency of use has grown as well. We already have major problems with wildlife-vehicle collisions in the Swan Valley, and I am concerned that the year-round growth in use and speed along Holland Lake Road for brief visits or meals at Holland Lake Lodge will add to these consequences. The land near Holland Lake provides important wintering habitat for deer and elk (and the carnivores who follow them), and they need to cross the road frequently. In a similar vein, people have made extensive social trails and lakeshore haul outs around the lake. I appreciate the MDP’s nod to improving social trail issues between the campground and the lodge (MDP 4.5.7), and I applaud the integration of efforts for bear aware education, protecting the night sky, and bird/waterfowl protection. But I am eager to see more convincing evidence regarding how POWDR would educate their guests about the local natural history and promote Leave No Trace principles among their guests (and their guests’ pets) to reduce habitat fragmentation and dysfunction.

**There must be more attention given to water quality, waste, and invasive species issues.** Tied to the above, the dramatic increase in human use will require much more nuance to the septic and waste management issues. Septic overloading is an especially important issue across lakes in northwest Montana, and an environmental impact statement should fully analyze this aspect before the project can proceed. Trash disposal has significant connections to wildlife safety and conservation, and I urge POWDR to demonstrate more awareness of and commitment to local and regional partnerships working to address this issue. The same could be said for invasive species. The US Forest Service and partners have been working to eliminate an infestation of invasive fragrant water lily from Holland Lake, and to prevent the emergence of aquatic invasive species like zebra mussels. POWDR guests should be required to show proof of stopping at a registered mussel check station before launching a boat, and they should be fully aware of the threats invasive species pose.

**POWDR’s business model does not seem economically or practically sustainable for the Swan Valley.** POWDR’s portfolio of resorts and action sports/adventure companies do not seem like a natural fit for the culture or economy of the Swan Valley. Holland Lake does not offer ski, rafting, or other high-impact recreation opportunities that occur at POWDR’s other locations, and the none of those places are as remote and ecologically intact as the Swan Valley. This leaves me concerned that POWDR has not fully invested in learning about the local history and ecology tied to this project. Does POWDR intend to offer guided experiences such as those that occur at its other locations? If so, is POWDR aware of the permit requirements for commercial use (including the limited permit availability), and would they be able to honor the necessary limitations designed to protect designated wilderness areas? The answers to these and related questions are not clear to me from the MDP. Also, as a year-round resident of the Swan Valley since early 2018, I am painfully aware of how difficult it can be to find places to live and work in our community, but POWDR’s proposed operating seasons of May 15-October 15 and November 20-January 15 feels like it will necessitate a transient workforce lacking the ability to fully know and conserve this place. The outfitters, organizations, and small businesses that thrive in the Swan Valley often do so because they have limited infrastructure. And where infrastructure does exist, it often endures because it serves a public, community-oriented service. While I appreciate many of the design aesthetics and environmental efficiency improvements to the built environment proposed in the MDP, the extravagant investment to expand and maintain this project does not sound sustainable.

**The MDP lacks equitability and creativity to address social-ecological issues of great need today.** As proposed, the MDP seems intent to serve a non-local demographic that is highly wealthy. Even if that model does prove financially sustainable, it does not feel equitable, and I fear that it will deepen the existing dilemmas of income inequality that exist in the Swan Valley. I believe the transfer of ownership at Holland Lake Lodge provides a unique opportunity to counter the status quo. We shouldn’t forget the option of returning the property to natural habitat, but if buildings are to remain, it would be wonderful if they could more meaningfully and directly engage people who would benefit from experiencing public lands but lack the privileges that would be required for the experience as proposed in the MDP . There is nothing inevitable about the Holland Lake Lodge property serving in the resort capacity like it has to date, and I’d encourage the US Forest Service to consider other models or partnerships by which this place could serve more equitable goals. Camp Paxson on Seeley Lake and Lubrecht Forest come to mind as novel uses of historic facilities on public lands nearby, but I know there are more options. I am particularly disappointed to see that this project makes zero mention of its past debts or future commitments to the Salish and Kootenai people upon whose traditional territory Holland Lake Lodge site exists. In addition to pursuing an environmental impact statement, I would urge any future owners/managers of this property to consult with the Confederated Salish & Kootenai tribes as a means of honoring and growing the land’s connection to Indigenous people. And if the future owners decide they absolutely must go ahead with some type of luxury lodging and recreation venture, I would be eager to see them use a resort tax and/or develop a grantmaking program to fund efforts that monitor, restore, and/or conserve the health of local ecosystem and its human community.

Thank you for considering these concerns, and please let me know if you have any questions about them. There are many people and resources available who can offer constructive insights to ensure a positive future of the Holland Lake Lodge property, and I urge POWDR or any future owners to slow down and take advantage of the knowledge and services in our local community. There is a growing body of research on many of the concerns I have raised here, and a recent report from Washington has some especially relevant insights for this project (Anna Machowicz, Carmen Vanbianchi, and Rebecca Windell. August 2022. *Recreation and Wildlife in Washington: Considerations for Conservation*, see here: <https://tinyurl.com/2h6363fm>). I hope this project improves with the robust environmental impact statement that it deserves, and I look forward to participating as it evolves.

Best,

Rob Rich