

Holland Lake Lodge Expansion Proposal

I am a third generation Montanan who has lived and worked in the Swan Valley since 1978. I am well acquainted with the trail systems around Holland Lake and helped set up trail counters on the Holland trail out of the Packer Camp in the late 1970s to monitor visitor use. Back then the Holland trail system was heavily used and continues to increase with inadequate attention paid to how best manage visitor use while protecting the natural environment and minimizing encounters with wildlife who live there.

As you are well aware, the trails leading into the Bob Marshall Wilderness Complex (BMWC) are a major portal into BMWC. The Holland Lake area is already too busy and congested without building a mega-resort. I do not support the Holland Lake Lodge (HLL) development project. It degrades the Swan Valley community in numerous ways. It degrades the historical/cultural integrity of the existing Holland Lake Lodge (HLL). The jobs created will largely be service industry jobs that may or may not pay minimum wage salaries. We do not need a mega resort built too close to the shoreline and an increase in crowding and impacts on existing trails in the Holland Lake area and throughout the Swan Valley.

[The National Environmental Policy Act](#), (NEPA), the nation's oldest environmental law, has a simple mandate with a major impact. It ensures the federal government informs and engages the public it serves. The three basic principles of NEPA are: 1) 1. Transparency; 2) Informed Decision-Making; and, 3) 3. Giving the Public a Voice. The FNF has been anything but transparent, as this kind of expansion has been in the works since 2019 but we public land owners were only recently informed of the HLL expansion proposal and given far too short of public comment notice, even with an additional public comment period due to public outcry.

I see a disturbing trend on the Flathead National Forest (FNF) to ignore the intent and purpose of NEPA regarding recreation special use permits on the Swan Lake Ranger District (SLRD) and instead moving immediately to a categorical exclusion (CE). This is not acceptable and will be challenged. Thirty-two new buildings to be built, new water system, new septic/sewage system, new parking lots, removing a lot of trees, new trails built, and a helicopter pad built ... and the FNF doesn't think this warrants a full NEPA review? The POWDR mega-development proposal is of such magnitude that it should have a thorough NEPA review. If outfitter/guide services are requested by POWDR there should be no

special considerations to award these permits to Swan Mountain Outfitters given their sordid history of operations on both state and federal lands and the bad reputation they have in the Swan Valley.

Build it and they will come. This proposal to grant a special use permit is nothing short of industrial tourism that the Swan Valley does NOT need. We don't need another Paws Up Resort, Double Arrow, or Yellowstone Club development. In recent years we see cars parked two miles down the road from the Glacier Lake trailhead. The answer is NOT to build bigger parking lots to accommodate the crowds. Lake shores are already impacted from over use, human waste, garbage, and few opportunities for solitude on the crowded trail systems on both the Swan Front and the Mission Mountains Wilderness. The ever-increasing demands for outdoor recreation will continue to force hard discussions about balancing opportunity and resource impacts. The FNF/SLRD should work with the [Aldo Leopold Wilderness Research Institute/Rocky Mountain Research Station](#) to initiate a research project to study, measure, and suggest visitor use management options that will not degrade the natural environment or negatively affect wildlife habitat in the Holland Lake area.

There is a need for a visitor use permit system for all trails accessed from the HLL complex. Since all visitor registration boxes were removed at trailheads on both the Swan Front and the Mission Mountains Wilderness several years ago, does the SLRD have an accurate measurement of visitor use for every trail on the district? The FNF/SLRD proposes bigger parking lots and better, easier access to other trails from the Holland Lake industrial recreation complex. How do these "improvements" impact other visitors not affiliated with the lodge? How does it impact other members of the public who can't afford luxurious accommodations (at \$450/night) but just want to take their family to Holland Lake to recreate? How does it affect fish and wildlife that uses the area? Between the large and busy USFS campground and this industrial recreation complex, the historic character of Holland Lake will be lost forever. It is more than "one small lake in the big Forest."

I am concerned about the impacts to fish and wildlife, especially bears, lynx, wolverine, wolves, fishers and other apex predators. Will the SLRD decide this industrial tourism development is merely a sacrifice zone instead of critical fish and wildlife habitat? How will increased visitor use affect bull trout and common loons, sensitive species at risk? As a public land owner, this is not acceptable.

Swan Valley Emergency Services wants the FNF to approve dredging the boat launch so they can launch bigger boats. I oppose this. There should be no dredging of the boat launch to accommodate Swan Valley Emergency Services. An arrangement could be made with the new lodge owners to allow a SAR boat to be docked/stored at their facilities. The new owners claim to be community-minded, so here's their chance. There should be a no wake zone around Holland Lake. It is too small of a lake to accommodate the large, high-powered boats that crowd the waters every summer weekend. What impact does this have on the loons that nest there?

Purpose and Need for Action:

How will increased demand for outdoor activities in the Swan Valley be measured accurately to reflect the tradeoffs of increased tourism being promoted by the FNF at the expense of compromising fish and wildlife habitat and protecting opportunities for primitive recreation and solitude? [Informational signing is inadequate and often ineffective](#). Who will provide education information to visitors on local wildlife, heritage and cultural resources, and hiking trail opportunities? Will these education providers have professional credentials such as being certified through the National Association for Interpretation? How will these education strategies to “inform and educate visitors” be monitored and measured for effectiveness of “Leave No Trace?” What are the 25 new jobs? Are they primarily low paying service industry jobs that have high turn over rates? How do these jobs help the Swan Valley economy? Currently many local businesses are unable to fill open positions due to low wages that don't pay the bills. Have the Pend d'Oreille, Salish, Kootenai and Blackfoot Tribes been consulted since these are their ancestral lands?

Expansion of East Holland Lake Connector Trailhead/Facilitate Hiker Access

You state that increased use is occurring at the adjacent USFS East Holland Lake Connector Trailhead. What are your methods of data collection to back up this assumption? Building bigger parking lots is NOT the answer. If you build bigger parking lots, soon they will be filled to capacity and overflowing. Then what? The same problem exists at the Glacier Lake trailhead yet very little is done that recognizes or applies visitor management tools that measure, monitor, and manage impacts and crowding. One hundred and twenty-one parking spots is excessive. It should be limited to 30 parking spots.

The most viable solution is to first implement a voluntary visitor use permit system and close trails if established thresholds are exceeded. If a voluntary permit system doesn't work, then a mandatory permit system should be

implemented where POWDR employees (who are trained by qualified recreation management/interpretation/environmental education professionals) to provide mandatory education and outdoor ethics sessions before a permit is issued. Once a quota is reached each day, then no more permits will be issued. It works in other busy national forest-managed lands and in our national parks such as Yellowstone and Glacier National Parks. The only way to manage the increasing demand for recreation in the Swan Valley is to carefully manage public access. Visitors don't want to recreate in areas filled with trash, noise, deal with unleashed dogs who are harassing wildlife or other visitors who may have their dogs on leashes, and experience a high volume of visitors.

We don't need to accommodate up to 156 guests per night in this mega-development. It should be limited to no more than 40. Highway 83 is already choked with excessive traffic, increasing wildlife fatalities, and unsafe driving conditions. The county road that accesses HLL is already too busy with many vehicles traveling too fast, creating unsafe conditions for other motorists, pedestrians, bicyclists, horses, and wildlife. Where will the resources come from to enforce speed limits, reckless driving, and wildlife fatalities?

Removal of "Dilapidated" Structures, Repair Existing Structures, Construction of New Structures

The construction of new structures is excessive in numbers and square footage on such a small 15-acre footprint. The character of HLL will be forever changed and historical/cultural integrity grossly diminished. The Gift Shop was constructed in 1924 and has historical/cultural value so should remain intact on the premises.

New structures will be too close to the shoreline and present both ecological and visual problems. This is NOT what the majority of Swan Valley residents, summer home owners, and many other public landowners desire for the future of HLL. This is evidenced of the majority of people attending your August 8 public meeting and the commenters on your FNF website who have expressed opposition to this mega-expansion proposal. The large Mission Mountains Restaurant capacity of up to 130 guests will create a wildlife attraction to odors and overflowing garbage bins, even if they are bear resistant.

Infrastructure

Proposed infrastructure upgrades to the water system and wastewater systems are beyond frightening. Even if they meet DEQ water quality standards, they may be in violation of federal water quality standards. Who from DEQ or the FNF will monitor compliance of operation of the HLL wastewater system once it is taken over from the USFS? Electrical service does need to be addressed at the historical

Old Lodge and Gift Shop. If underground fiber optic service is installed on FS Rd #44 to accommodate luxury accommodations at HLL, then it should be offered to ALL residents of the Swan Valley first. How does this mega-expansion proposal benefit local Swan Valley residents?

Vegetation Management

Proposed tree removal is excessive. This reduces nesting/perching sites for birds. It is the beautiful trees that define the quality of the existing footprint.

In closing, please keep me on your mailing list concerning this proposal.

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