Date: September 30, 2022

To: Kurt Steele – Flathead Forest Supervisor, Kurtis.Steele@usda.gov

Chris Dowling – Swan Lake District Ranger, Christopher.Dowling@usda.gov

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Re: Holland Lake Lodge Facility Improvement and Expansion Proposal

**\*These comments are my own personal opinions and not that of the organization I work for or any collaborative group that I am a part of.**

To whom it may concern,

I am writing my public comments largely in opposition to the majority of the proposed Holland Lake Lodge expansion and surrounding facilities proposal. I have several concerns about the project:

1. I formally request that an EA or EIS is conducted to analyze the potential environmental and social effects from this proposal. A categorical exclusion is woefully inadequate in regard to the potential impacts that the facility development and increased recreation use would create. The following bullet points are rationale for a more thorough environmental assessment
	1. As precedent, before Big Mountain was allowed to expand its ski area in 1995, the Flathead prepared an EIS on whether it should be allowed under that ski area Special Use Permit. Before the USFS allowed the Big Mountain ski area to expand ski lift facilities in Hellroaring Basin in 2019, it prepared an EA to be certain it should be allowed under the Special Use Permit.
	2. There is the potential for a substantial increase of recreational users to the area associated with this proposal, all of which have potential negative impacts to wildlife, water quality, and other visitors’ recreational experiences.
		1. The current lodge can accommodate 50 overnight guests and proposed expansion could accommodate 156 overnight guests. Under the current operating season (May 15-Oct 15th) that would potentially equate to an additional 106 recreation users each day. Over the five-month operating season, that is approximately 15,900 additional users to an area that is already being over-run with recreation users and impacts! If the Lodge were to expand its operating season to stay open year-round, then there would potentially be 38,690 additional recreation users and their associated impacts to the environment! And these figures don’t include day-users who may be attracted to the restaurant or outside patio before or after recreating.
		2. There is a nesting location for a pair of loons close to the east of the lodge and are sensitive to human disturbances (both motorized and non-motorized), which is a leading cause of nest abandonment and reproductive failure. In 2021, there were only three lakes in the Swan watershed that had successful nesting pairs of loons, one of which was Holland Lake.
		3. With the increased number of users on Holland Lake raises concerns about bull trout. Certainly, there will be more anglers fishing and a greater possibility of catching and poor handling of these native trout as well as mistaken identity with lake trout, which might lead to increased accidental deaths of bull trout. It seems like an effects analysis should be done to determine how much a concern this is.
		4. With more people staying at Holland Lake, there will surely be some of them coming with their motorized crafts and other non-motorized crafts, which only increases the risk of an accidental introduction of aquatic invasive species (AIS). If that were to happen, it could have far-ranging negative ecosystem effects for the entire Swan watershed, not just Holland Lake.
		5. What are the effects on grizzly bears and their displacement from all the increased recreation users going up the Holland complex trail system? I am concerned that the increase in recreation will both lead to more conflict (via increased probability of human-bear encounters and increased opportunities for improper food storage) and displacement of bears and other wildlife. The Master Development Plan states, “According to management, over the last 17 years, there has never been a grizzly sighting at Holland Lake Lodge. Nor are we aware of grizzly bears at Holland Lake or on the Holland Falls Trail. Black bear sightings do happen from time to time.” Surely the USFS can gather all the bear collar data from recent history to make a more informed statement about bear use of the area than what is quoted above. This statement also insinuates that recreation users will only be hiking to Holland Falls, and not further up the Holland Trail Complex to other areas. It is also very ironic given the statement above that a habituated black bear was breaking into cars and a home along Holland Lake in the days leading up to the September 8th open house, and that there was a culvert trap placed by FWP within site of the open house, trying to catch the habituated bear. In addition, there is also at least one habituated black bear roaming the Holland Lake campgrounds and Owl Creek Packer Camp every year and it seems that the USFS does not have the current capacity of both law enforcement and recreation managers/bear rangers to keep the current recreation base from developing bear issues around Holland Lake every year. So why add more recreation pressure that will only exacerbate the problem?
		6. There is a very interesting sewage management system that is currently in use where after the ‘sludge’ is filtered out, the wastewater goes into a lagoon to evaporate, but occasionally gets too full and needs to be emptied, at which point it is sprayed onto/into the woods above the lagoon. The area where the wastewater gets sprayed into the woods is fenced off from the public and wildlife. If this system needs to be expanded due to the proposal, will a larger area need to be fenced off, and if so, how big will the area be that is precluding public and wildlife use? Are there any environmental or public health concerns with spraying this wastewater into the forest and air?
		7. The Holland Lake area is some of the finest big-game winter range in the valley. What will the effects be if the Lodge is open year-round and there is suddenly a huge increase in winter motorized and non-motorized recreation?
		8. What will the impacts of more visitors be to others’ recreational experience, both on Holland Lake, the campgrounds, day-use areas, and the Holland Trails System (both Recommended Wilderness portions and non-Recommended Wilderness)?
2. I request that the USFS extends the public comment period.
	1. The Holland Lake Lodge Master Development Plan was not made publicly available on the USFS website until September 6th. It seems that the USFS should not be able to start the public scoping process until all information has been made available, and thus the public comment period should have started on September 6th, not September 1st and should be extended to account for this lack of public information. In my opinion, the original three-week public comment period for a proposal of this magnitude was too short anyway and should be extended to be a 60-day comment period. In addition, I question why the USFS did not do any prior public outreach concerning the proposal even though the USFS knew about this proposal from the Master Development Plan submitted on April 15, 2022. I understand the USFS is not legally obligated to inform the public of this proposal prior to public scoping, but it feels like very poor public relations in only giving the public an eight-day prior notice about the only public open house (September 8th) during the public comment period (originally), as well as no prior public outreach with local partners or the local community.
3. I am vehemently opposed to the USFS expanding the Holland Trailhead parking lot. Building a bigger trailhead parking lot should be accompanied by ways to help mitigate that increased visitor use and impacts, such as more funding for trails stewards, law enforcement, bear rangers, or consideration of when the area has reached its carrying capacity and needs to go to a permit system, etc. If you build it, they will come. What happens in 20 years when the expanded parking area is once again overflowing down Holland Lake Road? Will the USFS once again bulldoze more of the forest and expand the parking area again? Will the USFS keep doing so over hundreds of years until there is a parking lot entirely around Holland Lake and no resource values left to appreciate and cherish? At what point has the carrying capacity of the land and trail system reached its maximum without ruining other visitors' experiences and impacting the limited number of campsites, wildlife, water quality, etc? Obviously, the public might have differing perspectives, but as the land manager, the USFS should have the foresight, recreation use data, and a plan for the Holland Lake trail system on when enough is enough. Currently, is appears the USFS does not, which is why I am vehemently opposed to building a bigger parking lot without any foresight or future plan and simply building out infrastructure is poor, unsustainable recreation management (particularly infrastructure that will increase use and impact of the Recommended Wilderness character that some of the trail system leads to). Please remove this awful idea from the proposal, which has no merits and shouldn’t be lumped with the Lodge expansion proposal anyway. I have no problem with a bigger outhouse to alleviate impacts of human waste, which is actually something that would fall under the auspices of a categorical exclusion. During the increase of recreational use throughout the Swan watershed, I have seen and heard common trends that include trailheads and campsites (developed and undeveloped) that have exceeded carrying capacity, dispersed camping and associated impacts in areas that haven’t historically been utilized, a backlog of maintenance to the recreation infrastructure, and an abundance of litter and unburied human waste. Given the explosion of recreation, the associated impacts from that use, and the backlog of maintenance and limited USFS personnel and funding to properly manage these impacts, I do not feel that it is a responsible decision to increase recreational use and impacts across the landscape by tripling the capacity of Holland Lake Lodge, or by expanding the current Holland Trailhead parking lot size.
4. What are the effects to the Swan Front Recommended Wilderness and its Wilderness Character? There is no mention of the Swan Front Recommended Wilderness in the proposal, and it seems like the USFS forgot about it completely or hasn’t analyzed the increased recreation use impacts on it at all. What will the effects be from the increased use from a bigger trailhead parking lot and the additional users staying at the Lodge to places like Upper Holland Lake, Sapphire Lake, or Holland Lookout that lie within Recommended Wilderness? Has the USFS even written a management plan for this newly established Recommended Wilderness area yet? Have Standards and Indicators been established that would guide any sort of recreation management decision framework? Has any Wilderness Character Monitoring been completed in the Swan Front Recommended Wilderness yet? Until the USFS can answer yes to all of these questions, it has no business proposing a bigger trailhead parking lot, much less constructing one.
5. Will the Holland Lake Lodge’s Special Use Permit fees stay within the Swan Lake Ranger District? Is the USFS going to set aside these fees, or additional funding, to create additional positions to patrol the Holland Lake campgrounds, Holland trail system, Holland Lake, and Recommended Wilderness to educate users about Leave No Trace ethics, bear awareness, and USFS rules/regulations given the increased recreation use from this proposal?

I do not entirely oppose every aspect of the project and do see several positive aspects of the proposal:

1. I can appreciate that there may be local economic benefits from the proposal, and I like the idea of providing employee housing. If the proposal were to come to fruition, I request that there be some sort of accountability so that POWDR doesn’t build a bunch of new restaurants, lodges, etc, and then not the employee housing.
2. I have no problem with fuels reduction thinning of trees on the property (as long as that is the goal). However, it does seem like a double standard if other lessees on the south side of the lake are not allowed to cut trees down. The same equitable standards should apply to all lessees along the lake.
3. I am encouraged that the plan describes efforts to educate the public, lend out bear spray, and utilize bear resistant waste management techniques. Thanks to the USFS and POWDR for proposing to have bear-resistant dumpsters and containers at various places around the compound. I’m not sure if it is or not, but it should be a requirement by the USFS as part of the proposal and the USFS should commit to periodically check that they are being used correctly (locking lids closed, no overflowing garbage, etc).
4. I am not opposed to a renovating the historic gift shop into a visitor education center that contains educational materials and resources aimed at Leave No Trace ethics, bear awareness and safety, AIS awareness, bull trout identification, etc.
5. I would be alright with ‘modest’ improvements, such as fixing up the current lodge or historic gift shop, maybe adding a few new guest cabins, and employee housing, but the current proposal seems excessive and resembles a giant subdivision on my public lands, which would have perpetual detrimental environmental and social effects to the Holland Lake area.

Thank you for your consideration,

Luke Lamar

Condon, MT resident