

To: Kurt Steele – Flathead Forest Supervisor, [Kurtis.Steele@usda.gov](mailto:Kurtis.Steele@usda.gov)  
Chris Dowling – Swan Lake District Ranger, [Christopher.Dowling@usda.gov](mailto:Christopher.Dowling@usda.gov)  
Michele Mavor – Project Leader, [michele.mavor@usda.gov](mailto:michele.mavor@usda.gov)

October 4, 2022

From:

Maria Mantas, retired Flathead National Forest Botanist, Western Montana Science Director for The Nature Conservancy, Director Swan Ecosystem Center and Swan Valley Connections. Current Resident of the Swan Valley

Michael J. Madel, retired Rocky Mountain Front Grizzly Bear Management Specialist, Montana Fish Wildlife and Parks. Current Resident of the Swan Valley

To Whom it May Concern,

As long-time natural resource specialists, public land users, and residents of the Swan Valley, we would like to submit the following comments regarding the proposal to expand the infrastructure and special use permit at the Holland Lake Lodge.

After reviewing this proposal, it is obvious to us there would be significant negative environmental and cultural impacts to the Holland Lake drainage and Swan Valley if this action was permitted. These impacts would result from an increase in human activity, infrastructure, sewage, traffic, noise, and water use. We wish to comment on the level of analysis required for permitting such an activity as well as share our views on impacts to the environmental and cultural resources of the area.

It is our experienced opinion that any consideration of this proposal would require an Environmental Assessment (EA) at a minimum, and possibly even an Environmental Impact Statement (EIS). Most definitely what is proposed is outside the scope of a Categorical Exclusion (CE).

Comments on level of Environmental Analysis

From our collective personal experience as a natural resource specialists for the USFS, we observed and were personally involved in preparing NEPA analyses for numerous projects. Other actions similar to this proposal that we were directly involved with include the development of the Turner Mountain Ski Area, the Big Mountain Ski Area expansion, and the Blacktail Ski Area development. All these actions, which appear to be equal in scope to the proposed Holland Lake expansion, required EISs. As a seasonal employee in the Bob Marshall Wilderness, Maria was involved in patrolling recreational special use outfitting and guide permits. In her tenure, she observed the USFS rarely allowed any increased use (i.e. visitor days, season of use, or additional camps or camp expansions), holding fast to the value of traditional use. Categorical Exclusions were only used for minor, insignificant actions, such as replacing a campground toilet, installing a communications tower, or re-routing a short section of trail. These types of actions have a very small footprint with no impacts (or previously analyzed insignificant impacts) to water quality; Threatened, Endangered, or Sensitive Species; or recreational experience of other forest users. It is very clear that this proposal would greatly exceed the limitations of a CE.

Comments regarding environmental impacts of this action:

Threatened and Sensitive Species: It is well documented that increased human activity negatively affects several of the threatened and sensitive wildlife species known to use Holland Lake and the Holland Lake drainage. These include common loons, grizzly bears, Canada lynx, and bull trout. The lodge expansion would draw up to three times more people thus potentially increasing human – bear conflicts. More people means more bear attractants by individuals as well as an increase in food service production (and garbage) at the lodge. We recall this was a major consideration when the construction of the summit house at Big Mountain Ski Resort was being analyzed. An increase in people recreating and fishing on the lake could negatively affect the threatened bull trout. Human noise and activity could disturb nesting loons and use by Canada lynx. All these impacts need to be analyzed in depth.

Scenic Resources and Viewshed: The scenic quality and viewshed from all around what is currently a pristine, primitive lake and watershed would be severely affected. A major value to the American public utilizing Holland Lake and surrounding forest service lands would be highly compromised if not destroyed.

Historic and Traditional Cultural Use: Traditional use of the area has been a prized historic and cultural value among local residents and the American public for nearly 100 years. The expansion and reconstruction of the current lodge on public land is unnecessary and would destroy this value. Being very familiar with the current lodge, we appreciate there is a great need for improvements to the buildings and infrastructure. We support an upgrade to the buildings and infrastructure, and some of the other improvements proposed as long as the current footprint is not exceeded.

In closing, this action would cause ripple effects far beyond the footprint of the lodge grounds itself. These include more people on the lake, more people fishing, more people disturbing and displacing wildlife, more people affecting local residents and other recreationists in the area, more people dumping sewage into the ground and potentially the ground water and lake, more garbage, more noise, more trampling of native vegetation, and more traffic (automotive and boat) – meaning more accidents. What are the impacts of all these effects on wildlife, water quality, vegetation, fish, cultural resources, and the current quiet, laid-back experience that so many people from all over the world come to the Swan Valley and Holland Lake to enjoy? There are many places where people can go to have a highly polished resort experience. This type of development is not needed and not appropriate for a USFS permit in this place.

We not only insist that this proposal be analyzed at the EIS level, but we personally feel the proposal as stated is inappropriate and shouldn't have been considered in the first place.

Sincerely,

Maria Mantas and Michael J. Madel