

## INTRODUCTION

My concerns regarding the proposed expansion at the Holland Lake Lodge are many and varied, including both the planning process and content of the plan. My request is that the project proponents and the Forest Service scale back the plan. The project as proposed exceeds the limits of acceptable change and would be a significant detriment to local, regional, and national values related to cultural and natural resources that attract people to the location and the area to begin with.

My public service spans a 30-year career with the USDA Service Forest, having worked as archaeologist, tribal liaison, social scientist, advisory council coordinator, and senior agency leader. I worked directly in NEPA planning and project implementation at the forest, region, and national levels, including having helped 15 National Forests complete their forest plan revisions and having a significant role in developing Forest Service Planning Rules. I recently retired as the national Director of the Office of Tribal Relations at the Washington Office.

In addition to my agency experience, I have more than a half century of association with the Holland Lake Lodge and its surrounds. This is where I grew up, built my house, and started my family. I am a trustee of the Clark Ranch, located a mile directly south of the Holland Lake Lodge. Our ranch predates the Lodge as a 160-acre inholding homesteaded in 1914. There are currently 5 generations of my family connected to this very special place.

I offer my comments as an individual, in the hopes they will be taken seriously and used to change the trajectory of the current ill-conceived project proposal.

*Potential Benefits.* As a local resident with long-term multigenerational connections to the environment at and around the Holland Lake Lodge, as well as being a person with extensive experience in federal environmental law and policy, and Forest Service leadership, my overall impression is that some aspects of the project could be of benefit to the owners and operators, transient visitors, and local residents. Those aspects, including restoring the historic lodge and providing options for lodging, could improve the overall experience of the area without undue impact on the site and its surrounds – or on the extended environs around the lake, valley, and communities. However, those positive affects appear to be very limited. The larger expansion envisioned by the plan is, simply, too much.

## MAJOR CONCERNS

*Flawed Process.* The people I've talked to and corresponded with regarding the proposal consider the process so far to have been less than transparent and geared to ram a foregone conclusion down the throats of the people who cherish the setting in which the Holland Lake Lodge resides. At the center of this view is the perception that the Forest Service decision maker for the project is an active proponent for the project and is in cahoots with POWDR to make it happen. Whether that is true or not, the perception should be enough to send the project back to the beginning and for the Forest Service to engage in a more thorough public involvement process. The American people are the partners here, not POWDR and Holland Lake Lodge, Inc. Engage people like they really count and the process will go much smoother.

I recently served as the wrap-up speaker for a conference envisioning the next 50 years of NEPA. Some of the major conclusions of that conference should serve as red flags for the process by which this project has proceeded – and may proceed in the future. NEPA is intended to be fair and equitable, and that starts and ends with leadership taking a relationship-oriented approach instead of a transactional approach. That must include meaningful engagement designed to build understanding and trust – not based on propaganda and preconceived notions. Build relationships and trust to get more done better – from everyone’s perspectives. The process should have and implement a strategy to get information to people who need it at the very earliest opportunity – not just those who have the wherewithal to attend public meetings. More public involvement is not necessarily better public involvement; you have to use the public comments and let people know how you used that information.

*Use of Categorical Exclusion.* I see nothing in the plan that indicates that the full picture of the social, cultural, and biophysical environment will be looked at. The setting at Holland Lake is unique. That other special use permits have been used for other properties in the Region is not sufficient reason to not take a full look at this one, with appropriate and adequate social, cultural, and environmental review. The project’s impacts on that setting far surpass the site itself, though impacts to the site are important in themselves. The potential impacts to the site and surrounding local and regional areas indicate the need for a more extensive environmental analysis. The decision-maker has the authority to engage in full environmental impact analysis and disclosure and is under no obligation to allow the proposal to move forward. I encourage and request that the project be either eliminated or scaled back to a more appropriate level.

The use of categorical exclusions under NEPA for special uses and permitting “include activities like issuing special use authorizations to build a water pipeline and storage tank for an area with poor water supply and quality. Other examples are authorizing development or improvements for a communication site or authorizing an outfitter to lead guided hikes on a popular hiking trail.” Categorical exclusions are often used to reduce redundancy in analyses when project areas are significantly similar ecologically and socially. The project proposed for Holland Lake is at a level and scale well beyond the extent of the Agency’s own examples. Agency procedures must consider “extraordinary circumstances” in which case a normally excluded action may have a significant effect and require preparation of an EA or EIS. Holland Lake and its locality, including the historic Holland Lake Lodge, is essential for maintaining the public’s (local, statewide, regional, and national) connection to important and long-held values. I consider the environment around Holland Lake to be unlike other applications of a categorical exclusion. That is, it is an extraordinary setting that should be considered an extraordinary circumstance.

The category of analysis and disclosure under NEPA (CE, EA, EIS) is not as important as actually making the effort to assess and make public all of the necessary information, including the criteria on which the decision will be based. Public understanding, trust, and relationship would be enhanced if they were provided with a clear and unambiguous statement of what criteria the decision must be based on.

*Cumulative effects.* The cumulative effects of the project on the site and its surrounds – not to mention on people across the country with ties to the area – could be extensive and significant. Time after time and place after place, the special places that exhibit the qualities held in

abundance by Holland Lake have been subject to developments that have reduced the values that make them so attractive in the first place. There are fewer and fewer places where relatively rustic settings not trammied with the frills and creature comforts of cities exist. This is a rare setting of a type that is getting rarer all of the time, which means its value continues to increase. There need to be places where everyday people who can't afford the exorbitant prices of hyper-developed properties can go. This is especially true when public lands are involved, even if those public lands are under special use permit. The "special" in *special use* resides in the setting of Holland Lake Lodge and its surrounds. The proposed project would unacceptably degrade that specialness, not just for this location but for the cumulative collection of places like it across the nation. The project as currently proposed is at a scale that would not be in the best interest of the American public; it may be possible to design a scaled down version that would not have the devastating effects that would add to the cumulative reduction of quality of settings such as that around Holland Lake.

*Alternative Plans.* One of the beauties and hallmarks of NEPA is the opportunity to develop alternatives within a project area. The Forest Service and the project proponents should work with the public to develop alternatives to the proposed plan to attempt to find a socially acceptable and ecologically sound way to make the Lodge work. In addition, the suggestion was made at the public meeting in Seeley Lake on 10/04/2022 that the Forest Service buy out the permit holder and operate the Lodge property itself, in the public interest. The Forest Service should seriously consider that alternative to the existing special use permit arrangement.

*Indigenous Connections.* As the former National Director of the Office of Tribal Relations at the Washington Office of the USDA Forest Service, I am more than a little concerned when none of the public documents talk about indigenous connections to the project area. Even more concerning is the lack of information about whether government-to-government consultation has engaged the tribes with cultural ties to the Swan Valley and Holland Lake for millennia. I understand that consultation has been initiated and that the Forest's Tribal Liaison has meetings set up with the associated tribal culture committees, which is good. Remember that tribal consultation is a parallel yet separate process and the tribal input is reinforced by the Tribe's standing as a sovereign nation and by their millenia-long association with the Swan Valley.

*Social Values.* There is opportunity here to do NEPA right. Remember: NEPA is a floor, not a ceiling. The Forest Service should undertake an appropriate level of analysis, commensurate with the potential impacts to the site, associated areas and people under the discretion of the signing official. I encourage the Agency to take the necessary steps to conduct analyses in balance with Holland Lake's unique setting. That should include a systematic analysis of the perceived impacts to (1) residents in the immediate area, within a couple of miles at least, (2) residents connected to Holland Lake Road, (3) residents in the Seeley-Swan area, (4) people with long-term association with Holland Lake (Montana residents or not), and (5) the wider public. Public comment is important, but systematic collection of the associated values of people with real connection to this location is essential.

Holland Lake's natural, cultural, and social environment is unique and calls for more consideration of the effects on local residents, the bigger picture of what the public values, beliefs, and attitudes about the setting, and the economic trade-offs between expanded

development and the current condition. My belief is that the perceived economic advantages and changes to the recreational environment are not as important as maintaining the unique setting for which people are attracted to Holland Lake to begin with. I request that the Forest engage the assistance of a qualified social scientist, whether from the Forest Service or outside entity such as a university, to conduct a systematic inquiry into the values, beliefs, and attitudes associated with Holland Lake and its surrounds. For reference, please see the Forest Service's guide to collecting public attitudes, beliefs, and values, available at <https://www.fs.usda.gov/treesearch/pubs/33266>.

I also request that the Forest Service engage the assistance of a qualified third party economist or economic research group to look closely at the most likely local and regional economic impacts of the proposed project, at several different scales of development/growth. The economic models employed by the Forest Service are not designed, nor adequate, for economic analysis of projects of this type.

Economic values and impacts alone are not sufficient, nor are the benefits afforded the recreating public. The rights of and impacts to private land owners, including us at the Clark Ranch and others who live or have properties in close proximity to the Lodge, should be fully considered.

*Water.* The proposal for larger wastewater and sewage systems and parking areas requires full analysis and disclosure. If those impacts are found to have potential impact to the water quality of Holland Lake, or if it has potential impact to fisheries, the project should be scaled back or rejected. The report in the public record looks at the current condition but makes insufficient recommendations and observations on the needed modifications to support the entire expansion. The timing of the analysis is also problematic, as that period is not reflective of what visitorship in the campground might have been in a non-COVID era.

*Civil Rights/Equal Opportunity Employment.* When I have taken visitors to the Holland Lake Lodge, we have never felt welcomed. Even when the people I've brought have been looking at the potential of staying at the lodge, we were essentially chased off. Last summer, for instance, I brought friends down to the lodge to see the place and enjoy the beautiful view. Christian met us on the lawn by the lake and the monolog he engaged in was most disturbing. He was complaining about not being able to find enough workers. In the process he claimed that "My customers don't like to be served by people who are not white. And white people don't want to work." I, along with my friends, found this to be disturbing, racist, and unacceptable, certainly not in keeping with the requirements of holders of special use permits issued by the Forest Service. It is also a window into his current and future hiring practices, practices that should be looked at closely by the Agency's civil rights staff. That said, I do appreciate that Christian has provided temporary employment for several of my nieces and nephews over the years. Local employment opportunities are important and appreciated, but it must be done in keeping with civil rights laws, regulations, and policy.

*Noise Pollution.* I have a strong concern about the impacts of increased noise pollution. At the Clark Ranch we already hear the all-night parties from wedding celebrations at the Holland Lake Lodge, loud motor boats on the lake, and general festivities. Those sounds are not terrible at current levels. With increased visitorship, that noise could expand from being noticeable to being

distressfully disturbing. It is not difficult to envision a scenario in which weddings are held nearly every weekend from late spring through early fall. If that were to happen, the relative peace and quiet of our rural family property would be unacceptably changed. Other residents around Holland Lake are also alarmed about the potential for increased noise emanating from the lodge and from increased traffic on the roads and the lake. In addition, increased motor boat use would not only severely impact our soundscape, it could impact fish and wildlife in and around the lake. I understand that POWDR does not intend to provide motorized watercraft or other machines. However, increased visibility of the Lodge through advertising, additional visitors, and social media will increase overall demand for visitors to Holland Lake, including people bringing their own toys or renting them elsewhere. The economic status of people who can afford to stay at the lodge is such that they will either have or be able to easily obtain motorized toys that will severely impact the soundscape of Holland Lake and its surrounds.

We do get some noise from Owl Creek Loop and people often drive up to the ranch, exploring or just being lost. This includes regular cars and trucks, but there is already a proliferation of ATVs and UTVs. The number of side-by-sides tearing up and down our road and power line roads has continuously increased. And now that use goes well into the night. Increased visitation at the lodge will directly create more traffic on the Forest Service Road that leads to and dead-ends at the ranch, as well as on other roads that lead to or pass by local residences. The Forest Service does not maintain the road that leads to the ranch and it already is in very poor condition, partly due to public traffic. Increased traffic related to higher use of the Holland Lake Lodge will result in many more people travelling local roads, resulting in worse road conditions and more unhealthy dust in the air. There will be more (potentially negative) interactions between residents, visitors, wildlife, and additional noise. It may also negatively affect local land valuations as the sense of being in the middle of nowhere decreases.

*Winter Recreation.* We currently experience minimal impact from public winter recreation. We hear or encounter snow machines in the winter, but only occasionally. Expansion of facilities will cater to and encourage snowmobiling and ATV/UTV winter use whether they offer those machines at the Lodge or not. That increased activity will affect our exposure to trespass and drastically negatively affect our soundscape, as I noted in connection to hunting pressure and trespass earlier. Snowmobiles do not depend on roads for their pathways, so they are more likely to trespass into the serene and pristine snowscape that we enjoy at the ranch.

*Viewshed.* The project as proposed is no small change to the amazing viewshed of Holland Lake. The number and size of the buildings, and especially the view of new structures along the lakeshore, would completely change the setting for people using the area. This would reduce the value of a relatively undeveloped and beautiful lake to the American public and should not be allowed. The project proponents and the Forest Service should analyze the views not just from the Lodge area looking out, but from the surrounding area looking in.

A scaled back version of the plan should include significant set-backs of all structures to reduce the impact on the viewshed. One of the most iconic views in the world is from the bridge across Holland Creek at the outlet of Holland Lake. The project as proposed would unacceptably mar views from that incredible spot, as it would from anywhere else along the lake itself. Other iconic views are found high on the trail to the falls and along the trail to the Bob Marshall

Wilderness from the Owl Creek Packer Camp. Those views should be considered in any design for any expansion to the Holland Lake Lodge.

While the summer homes on Holland Lake exist under a different type of special use permit than the Lodge, the setback requirements to maintain the viewshed should be consistent between the two types of permitted properties.

*Hunting Pressure and Trespass.* Additional visitorship at the Lodge would undoubtedly include more hunters, especially as the lodge expands its seasonal capabilities. This would result in higher levels of hunting pressure, impact to habitat, more human/bear conflicts, etc. We already experience hunters on or in close proximity to the ranch, including trespassers on our private property. That intrusion would only increase should the proposed project proceed as planned. In addition to the direct impacts on the road to the ranch, the additional turn-arounds at our property and outright trespass will make it necessary for the Forest Service to provide additional road maintenance (they currently do not maintain the road at all), signage warning travelers of the dead-end at private property, and a gate. The gate would be placed in a location where large vehicles pulling trailers could more easily and safely turn around. That would be a public benefit, not just a protection for us at the ranch.

*Fisheries Habitat.* The area is renowned for fishing opportunities. The identification of critical bull trout habitat in the area is well known and should be considered a major concern as potential for increased fishing pressure and potential for effects to habitat through increased visitation – whether by fishers or other recreation seekers. Again, the additional water use at an expanded Lodge facility and associated structures should be analyzed for its effects to the water table and concurrent impacts to fisheries habitat.

*Wildlife Impacts.* The project area is within the Primary Conservation Area under the Northern Continental Divide Ecosystem Grizzly Bear Management Strategy. I understand that the USFWS has not been engaged in consultation yet because the initial biological analysis has not been completed. However, the no-surprises principle should apply here as it does elsewhere. The sooner the USFWS is in the loop the better. There are grizzly bears in the area, regardless of what the lodge manager and other project proponents have stated. Approving this proposal as proposed will fail to abide by the spirit of the Conservation Strategy to manage public land in the NCDE recovery zone to assure the maintenance of a healthy grizzly bear populations in the face of increased private land development and ongoing climate change.

It is not only grizzly bear and grizzly bear habitat at stake. There is a plethora of other wildlife species that could be impacted by the level of increased recreation-oriented visitorship. Those impacts affect an area much greater than the Lodge permit area. This would without doubt create significant negative impacts throughout the Swan Valley on wildlife habitat and many species including bears (both black and grizzly), lynx, wolverines, deer, elk, moose, mountain lion, sandhill crane, loon, beaver, and so on. The proposed expansion of the Holland Lake Lodge is not appropriately scaled because of the cumulative negative impacts on grizzly bears and grizzly bear habitat, as well as the enormous negative impacts to wildlife due to increased recreation on public lands outside the lodge site.

*Cultural Resources.* I like the idea of doing more to preserve the historic structures and upgrading existing facilities, but the expansion is at odds with the historic values that attract people there to begin with, including the integrity of location, design, setting, materials, feeling, and association of the historic district. That the old Lodge and many of the other buildings on the site are dilapidated and in need of repair falls directly on owner of those structures. It is the permit holder's responsibility to keep up the property and the current holder has failed in that responsibility. However, the old Lodge building retains integrity of location, setting, materials, workmanship, feeling, and association. The extensive changes to the setting as envisioned by the plan include removing most of the buildings that contribute to its eligibility for inclusion on the National Register of Historic Places, and would create a multitude of other buildings that are not historic structures. Those changes would significantly diminish the feeling and association of the historic district and the old Lodge building. The changes would eliminate the area as eligible for listing on the National Register of Historic Places as an historic district, essentially destroying cultural resources. That would be an unacceptable significant adverse effect.

If the other buildings are constructed as illustrated in the plan, they will only distract from the historic character of the setting. This is especially true for the new building adjacent to and almost touching the old Lodge. That new building will detract from the feeling, setting and association so much that the old Lodge itself will no longer be eligible for listing. That also would be an unacceptable adverse effect. Mitigating these impacts would require a substantive design change in consultation with the Montana State Historic Preservation Office and with the Advisory Council on Historic Preservation.

There has been an archaeological survey of the area and, according to the Montana State Historic Preservation Office, that survey is out of date and therefore inadequate. Therefore, it is not possible to do even a preliminary determination of the potential impacts to historic or prehistoric resources at the project area or in the surrounding areas that could be affected by primary activities on site or secondary impacts of increased visitorship.

Further historic and archaeological work is needed prior to a decision regarding the project, and that work should include survey and testing in close consultation with the Tribal Historic Preservation Office of at least the Confederated Salish and Kootenai Tribes of the Flathead Nation. In addition to the direct value of identifying and protecting cultural resources potentially impacted by this project, the involvement of the Tribe could increase the partnership between the Flathead National Forest and the Tribe. There is potential that the area is a traditional cultural landscape or even an indigenous sacred place, so working with the Tribe's cultural committees at the very earliest opportunity is essential.

*Local Land Values.* The economic value of private land in the area would be directly affected by development. The value of a rural setting that is quiet and relatively undisturbed by road, off-road, and aquatic motorized use is in some ways an intangible value. However, the economic value of private land like the Clark Ranch would also be directly and unacceptably negatively impacted by the project as proposed. A more modest scale that would affect the setting less would have fewer negative impacts on local land values may be more acceptable. Again, an independent economic analysis would be needed to fully assess the level of that impact on us and other landowners in the area.

*No added value to the local economy.* I've seen scenarios play out many times all across the country, where large recreation developments, mining, and other extractive industry make promises of economic benefit to the local area. They promise more jobs for locals and increased quality of life and those promises go unfulfilled. Like many of those other projects, the promised supposed benefits will not flow from this project. Local business owners are struggling already to fill vacant positions. That means the project proponents would import workers from outside the local area, outside of Montana, and even from outside of the United States. Income from the operation of this project would end up in the hands of out-of-state corporate executives and out-of-area imported seasonal workers. Housing for temporary employees may be made available on-site, but what about permanent employees? Housing in the Valley is already at a premium and putting more stress on that would only raise the cost of living for everyone. The Forest Service should require a full economic analysis from a reputable neutral third-party economist to determine the realistic likely economic impact of this project. I believe the result would be an overall lack of value to the local and regional economy. A significantly scaled back version that would retain and reinforce the historic nature of the lodge and its setting would more likely be of higher economic benefit.

#### CONCLUSION

For all the reasons I've outlined in this comment, in addition to the issues detailed in thousands of other comments received by the Flathead Forest on this proposed commercial expansion of Holland Lake Lodge, I strongly urge the Forest Service to either reject the proposal *in toto* or to work with the proponents and the public to find an appropriate scale at which to further proceed.