

Flathead-Lolo-Bitterroot Citizen Task Force  
PO Box 9254  
Missoula, MT 59807

October 5, 2022

Flathead National Forest  
Attn: Kurt Steele, Forest Supervisor, Shelli Mavor, Project Lead  
Sent via: <https://www.fs.usda.gov/project/?project=61746>

Dear Mr. Steele and Ms. Mavor,

Please accept the following comments on the proposed Holland Lake Lodge expansion on behalf of the Flathead-Lolo-Bitterroot Citizen Task Force.

Public notice and involvement has been woefully inadequate. We agree with Senator Jon Tester that it needs to be longer than October 7<sup>th</sup>. The Forest Service must open a new 60-day comment period for a project this large and with so many issues.

The Flathead National Forest is proposing to Categorically Exclude (CE) this expansion from environmental analysis based on 36 CFR 220.6(e) (22).

This categorical exclusion was intended for small projects such as:

- (i) Constructing, reconstructing, or expanding a toilet or shower facility;
- (ii) Constructing or reconstructing a fishing pier, wildlife viewing platform, dock, or other constructed feature at a recreation site;
- (iii) Installing or reconstructing a water or waste disposal system;
- (iv) Constructing or reconstructing campsites;
- (v) Disposal of facilities at a recreation site;
- (vi) Constructing or reconstructing a boat landing;
- (vii) Replacing a chair lift at a ski area;
- (viii) Constructing or reconstructing a parking area or trailhead; and
- (ix) Reconstructing or expanding a recreation rental cabin.

The Forest Service website on CEs states: "...the agency must consider whether there are extraordinary circumstances which would preclude the use of the categorical exclusion... if extraordinary circumstances apply, the agency must conduct an environmental assessment or environmental impact statement."

Building 33,000 square feet of new buildings including a new lodge, a restaurant, more cabins and other facilities do not fit into the categorical exclusion. Furthermore, the proposal does not even mention the extraordinary circumstances that are related to this proposed action. Resource conditions that should be considered in determining whether extraordinary circumstances related to a proposed action warrant further analysis and documentation in an EA or an EIS are: Federally listed threatened or endangered species or designated critical habitat, species proposed for Federal listing or proposed critical habitat, or Forest Service sensitive species. [36 CFR 220.6(b)(1)(i)]

The area includes habitat for the grizzly bear, lynx and bull trout, protected by the Endangered Species

Act. The wolverine is proposed for protection and the area is a nesting site for loons. Other extraordinary circumstances include the size (the list of proposed construction and infrastructure is four pages long), potential for expansion of the permit area and structures (reasonably foreseeable connected actions), its location next to the Bob Marshall Wilderness within a linkage area for grizzly bear recovery and its potential to alter the character and lifestyle of the Swan Valley also preclude a CE.

Holland Lake and Creek contain a disjunct population of bull trout and is designated bull trout critical habitat. Bull trout spawn in Holland Creek and move to Holland Lake to mature for several years before returning to the creek to spawn again. These bull trout do not migrate through the Swan River to grow and rear in Swan Lake like most other bull trout in the Swan Valley do (Lindbergh Lake is the other disjunct population in the Swan). While it is a small population it is genetically distinct and fills a unique niche.

The Holland Lake area is designated critical habitat for Canada lynx. It has deep snow in winter and has other habitat attributes that lynx require. Monitoring in the Swan Valley has detected lynx in this area.

The Holland Lake area is in the Primary Conservation Area (Recovery Area) for grizzly bears in the Northern Continental Divide Ecosystem. The Swan Valley is a critical linkage between bears in the Bob Marshall Wilderness complex, Mission Mountain Wilderness, Rattlesnake Wilderness and other roadless habitats. While the Master Development Plan downplays the presence of grizzly bears by stating: "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." This statement is ridiculous, just because no one has reported a grizzly bear sighting doesn't mean that bears don't use and frequent the area -- ask anyone who lives in the forest and puts up a trail camera.

The mere presence of four listed/proposed species is extraordinary and warrants evaluation in an Environmental Impact Statement and consultation with the US Fish and Wildlife Service.

In addition, this proposal increases the human footprint on the site and in the adjacent forest and lake by at least three-fold. This is added to the heavily used campground with 40 campsites, a day use area and group site. This will put more pressure on the lake and trails as well as wildlife and fish which must be addressed as cumulative impacts to wildlife in an EIS.

Since the Holland Proposal includes expanding to year-round use, there must be full analysis on the likely impacts to all four seasons of grizzly bear habitat use including denning habitat for grizzly bears and denning habitat for lynx and wolverine. Bader and Sieracki (2022) and Mace (Flathead National Forest Plan) identified grizzly bear denning habitat directly adjacent to the Holland Lake area. Recreational activity including winter use can displace grizzly bears from prime denning habitats and there is no documented instance of a grizzly bear denning within the boundaries of a ski area (Bader and Sieracki 2022). Research has shown that even cross-country skiing can disrupt denning grizzly bears (Linnell et al. 2000).

Increasing recreational use in all four seasons displaces grizzly bears from prime habitats. The proposal would quadruple visitor use days. Currently there is very little winter use of the Holland Lake area. As proposed, this would change dramatically. There is also a possibility of expanded winter use in the future including heli-skiing. The new permittee (POWDR) has developed mountain resorts across the West. It stretches credibility that this company wants to own and manage a small area on Holland Lake without having larger plans. With their foot in the door they could seek further expansion onto public

lands with the possibility of heli-skiing, mountain bike trails, an aerial tram or a ski area. An affiliate company of POWDR is Powderbird Heli Skiing so it entirely within the realm of possibility that even more expansion is in the works. Heli-skiing has been found to displace grizzly bears from prime denning habitats (Targhee National Forest, Heli-Skiing Permit Denial 2021).

When the lodge was put on the market one of the promoted features was “Ability to land helicopter on property; floatplane on lake right in front of property” [See <https://www.land.com/property/1947-Holland-Lake-Lodge-Road-Condon-Montana-59826/7222264/>].

Real estate development in surrounding areas of private land are likely. The business model is an upscale destination not available to everybody. We see what follows. National Forests are impacted like the Big Sky area where development and recreation are out of control and there is pollution of the beloved Gallatin River.

The Flathead National Forest must declare that this proposal is not in the public interest and revoke the Special Use Permit. There is already a major ski resort (Whitefish Mountain) and a smaller one (Blacktail Mountain) on the Flathead National Forest so there is no need for another year-round resort. The Flathead National Forest should recommend that the existing Lodge and outbuildings be designated as a National Historic District.

The National Environmental Policy Act requires a range of alternatives be evaluated for impacts to the environment as well as analysis of cumulative impacts. Moreover, the entire history of the Special Use Permit, its ownership and transfer and any Forest Service approval of such actions must be revealed. Under any circumstance a categorical exclusion is not appropriate for this proposal and all impacts including reasonably foreseeable consequences must be analyzed in an Environmental Impact Statement.

Patty Ames  
President  
Flathead-Lolo-Bitterroot Citizen Task Force