

Missoula County Commissioners

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BCC 2022-245
Oct. 6, 2022

U.S. Forest Service, Swan Lake Ranger District
Attn: Shelli Mavor
200 Ranger Station Road
Bigfork, MT 59911

Re: Holland Lake Lodge Facility Improvement & Expansion

Dear Ms. Mavor,

Thank you for the opportunity to comment on the proposed Holland Lake Lodge Facility Expansion project, and for extending the comment deadline. According to the Sept. 1, 2022, scoping letter, the proposal is for the repair and expansion of the Holland Lake Lodge that operates on U.S. Forest Service land through a resort/marina special use permit with the Forest Service. Holland Lake is a well-known and treasured place both for the Swan Valley community and the region, as it is a destination for a variety of recreationists and contains important natural resources and scenic value. For this reason, thorough understanding of the proposal, its potential impacts and benefits, and community input are important to ensure an outcome that works for the community, the lodge owners and the Forest Service.

At this early stage, our primary concern is the proposal to categorically exclude the proposed project from documentation in an environmental impact statement or an environmental assessment (EA), based on the guidance in 36 CFR 220.6(e)(22). The proposed project would have potential impacts to several of the resource conditions cited in 36 CFR 220.6 (b), including at least four threatened and endangered species, floodplains and wetlands, potential wilderness area, historic properties, as well as significant levels of public interest. While it remains unclear whether the Flathead National Forest may have the authority to categorically exclude this proposal, it certainly has the authority to choose not to do so. We request that the Flathead National Forest complete an EA for this project to better assess individual and cumulative impacts, evaluate alternatives to the existing proposal and improve transparency in the decision-making process.

Other concerns that require considerable attention include:

- Holland Lake and the surrounding area contain numerous valuable resources, including important habitat for three species listed as threatened under the Endangered Species Act: bull trout, grizzly bear and Canada lynx, as well as the wolverine, which is in the process of being listed. We are concerned about the potential impacts this proposal would have on these species, and we think they merit further analysis. For example, Holland Lake is within an area identified by the Northern Continental Divide Ecosystem

Conservation Strategy for grizzly bears as the Primary Conservation Area. As outlined in the Conservation Strategy, a change in the number or capacity of developed recreation sites within the Primary Conservation Area may be offset by an equivalent reduction elsewhere in the same Bear Management Unit. This is also included in the Flathead National Forest's Land Management Plan.

- The proposed expansion of Holland Lake Lodge would increase capacity from 50 overnight guests (plus staff) during the regular season of May through October, to 156 overnight guests and five additional staff during the regular season. This is an increase from 11,340 user days per year to 46,980 user days per year, for overnight guests only. That does not include additional day use guests visiting the lodge for special events and dining or added use that would take place if the lodge were to remain open from November to January, as included in the proposal. This dramatic increase in visitation, especially with use extending farther into the fall, would inevitably impact and create conflicts with grizzly bears during a time when the species is consuming more food as it nears denning. The risk to grizzly bears is two-fold: a potential for more bear-human conflicts, which ultimately leads to more bears being re-located or euthanized, and an increase in users to the area, possibly resulting in disturbance to core grizzly bear habitat.
- As expressed by members of the community at the Sept. 20 Swan Valley Community Council meeting, the proposed expansion could significantly impact water quality, as it would require a substantial increase in capacity for the water and wastewater systems. In addition to serving as a major recreation destination, Holland Lake contains important aquatic habitat and is connected to important bull trout fisheries. It is essential to ensure that increased impact to the wastewater system will not affect water quality. Also at the Sept. 20 meeting, Swan Lake District Ranger Chris Dowling alluded to discussion around the option of the Holland Lake Lodge owner taking over management of the entire wastewater treatment facility, which includes service to the public campgrounds. This may benefit the Forest Service by reducing costs but could have serious downsides if the system is not managed properly.
- Another impact of the proposal includes the displacement of the local community from opportunities to visit and enjoy Holland Lake as they have for generations. Holland Lake and Holland Lake Lodge are integral to the recreational setting and experience for members of the local public who live in the Seeley-Swan area. The proposal to expand the Holland Lake Lodge will lead to a very substantial increase in visitors and an increase in the cost to use the various lodge facilities. Such changes will create an exclusive resort atmosphere wholly different from the low-impact facilities that have been in place for many decades, and which will likely out-price locals from enjoyment. The increase in visitors and visitor days will also impact local services for public safety and law enforcement, for which these out-of-area visitors will play no part in funding through property taxes.
- In addition, there are existing issues with the Holland Lake boat launch that have been known for many years but have not been addressed. The current boat launch is inadequate for launching many larger boats, including those that the Quick Response Unit (QRU) needs for water rescues. This is especially true later in the season when water levels drop. Increased recreational use associated with lodge expansion could lead to a greater need for emergency response, and adequate emergency access does not currently exist. We would like to see an analysis of options for how improved boat

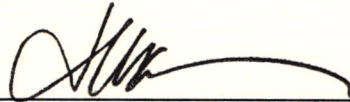
launch infrastructure could be provided to better serve both emergency response needs and those of the general recreating public. This has been a high priority for the Swan Valley Community, including the volunteer QRU.

- Lastly, as reflected in the high number of comments on this project, the historic lodge at Holland Lake is a treasured site for the community and across the region. This high level of interest deserves a high level of transparency in the evaluation and decision-making process. The community members present at the Sept. 20 meeting expressed concerns and the desire to see more thorough information on potential impacts. Overall, they felt the scale of the proposed expansion was not in line with the feel of the historic site. They preferred something smaller, with less impact to the lakeshore and viewshed. There was also concern about the transfer of ownership and the process for this transfer, considering the proposed changes should be better detailed in the proposal. Finally, it was also unclear from the information provided at scoping as to what permits and licenses (water, sanitation, lodging, building, shoreline, etc.) are required, and who would be the applicant. It would be helpful for all involved if this information was included in the packet.

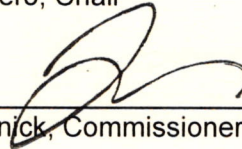
Thank you for considering our comments. We look forward to your response and continued partnership.

Sincerely,

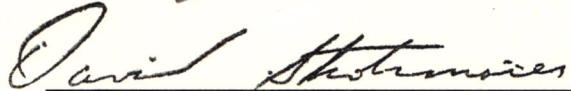
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