October 6, 2022

Shelli Mavor, Project Leader

Flathead National Forest, Swan Lake Ranger District

200 Ranger Station Road

Bigfork, MT 59911

Holland Lake Lodge Facility Improvement & Expansion

Dear Ms. Shelli Mavor,

Thank you for the opportunity to submit comments on the Holland Lake Lodge (HLL) expansion project. I am writing to express opposition to the project as described in POWDR’s current Master Development Plan (MDP).

I am very concerned with the prospect of expanded human use at the site, especially the impacts to the Holland Lake ecosystem and socio-economics of the surrounding valley. The ecosystem encompassing the site is interconnected with multiple threatened and endangered species, including; Canadian lynx, grizzly bears, and bull trout. The Swan Valley has worked very hard for the conservation of the valley for many years to lessen the impacts from human use and preserve the wild nature of the area. Human pressure in the valley is already stressing recreational sites and transportation corridors, this project would further increase undue pressure.

I encourage further due diligence by the United States Forest Service (USFS) through additional project review and public participation before moving forward with a final decision. A troubling aspect of this development plan is the intention of using a Categorical Exclusion (CE) to approve major expansion of new buildings, parking and infrastructure on the current site footprint as stated in the Scoping Package dated September 1, 2022. I fail to see how this is a valid application of this tool for this project. I understand why these tools were created, with the USFS maintaining roughly 29,700 recreation sites it was need for maintenance and upkeep of recreation sites (Federal Register, 2020). During the amendment process of these CEs the Federal Register (11/19/2020) indicates commenters were worried that 36 CFR 220.6(e)22 was too broad and could result in significant effects. Agencies do need tools such as this to conduct maintenance operations and upkeep, but this is an instance of misuse of this tool. Under National Environmental Policy Act (NEPA), projects of this magnitude require a full review of current and future impacts with either an Environmental Assessment (EA) or Environmental Impact Study (EIS). A Memorandum from 2010 seems to speak to the situation we have at hand.

(Memorandum For Heads Of Federal Departments And Agencies, Nancy H. Sutley, Subject, Establishing, Applying, and Revising Categorical Exclusions under the National Environmental Policy Act - Nov 23 2010)

*“Since Federal agencies began using categorical exclusions in the late 1970’s, the number and scope of categorically-excluded activities have expanded significantly. Today, categorical exclusions are the most frequently employed method of complying with NEPA, underscoring the need for this guidance on the promulgation and use of categorical exclusions. Appropriate reliance on categorical exclusions provides a reasonable, proportionate, and effective analysis for many proposed actions, helping reduce paperwork and delay. If used inappropriately, categorical exclusion can thwart NEPA’s environmental stewardship goals, by compromising the quality and transparency of agency environmental review and decision making, as well as compromising the opportunity for meaningful public participation and review.”*

The USFS main job is to balance the use of our forests for multiple users while applying the rules set forth to manage our natural resources, and working with the public for their best interests. There are too many questions about this project which must be addressed, and there seems to be more that comes up every couple of days. I am disturbed by the hasty manner in which the HLL project was rolled out to the public, and with such a short public comment timeline. The mention of using the CE to approve this project by USFS initial documents goes against the due diligence a federal agency must undertake when managing federal lands, and has created a feeling of mistrust by the public. I have conducted due diligence reviews of some very high-profile projects as a consultant and am stunned with this language in the initial release. You can always reduce the scope of reviews, but I find the back peddling inept for a project of this size for a historic property such as this. Furthermore, after listening to the October 4, 2022 Seely Lake public meeting, POWDR representatives stated they too had not conducted their due diligence to reach out to the community before the rollout of this possible project. These two situations have created a situation which must be addressed through increased transparency and review by BOTH parties (USFS and POWDR).

I grew up hiking and camping in the Swan Valley, and got married at Holland Lake Lodge. My childhood friend’s family has a cabin on Holland Lake which I frequented often. The Swan Valley is a very special place which still embodies the wilds of Montana without overdevelopment, this is why many love this area. It is still accessible while keeping the wild feel. I know this is the same reason why POWDR wants to develop this site, but a development of this size into a four-season sizeable resort is not in the best interest of the area. Myself, along with many others realize development is natural but we know we must be good stewards of the environment, especially with increasing human population growth throughout the state. Some times the best choice is no growth at all.

Regards,

Doug Stocker