

Shelli Mavor, Project Leader
Swan Lake Ranger District
200 Ranger Station Road / Bigfork, MT 59911

Dear Ms. Shelli Mavor,

Given the new comments, meetings, and documents shared since my early contribution, I have developed some further concerns that I felt compelled to share as this initial comment period draws to a close. I have pasted my original comment as an appendix below, and I stand by its statements with stronger conviction. In addition, I offer the following:

Hopefully it has become clear that a categorical exclusion is entirely inappropriate for this proposal, and that a full environmental impact statement (EIS) is the least that can be done to address the extensive concerns of such diverse stakeholders. I fear most people may not have had the awareness or time to produce the “substantive” comments that the US Forest Service described as most helpful during the local meetings, but the bipartisan, organized, abundant, and widespread opposition is clearly demanding more rigorous analyses, and often immediate withdrawal of the project. In addition to the collective impact of the responses in this comment period, I would recommend a few of the commenters who have informed and inspired me, including but not limited to: Chris Servheen (Montana Wildlife Federation), Kristine Ackland (Center for Biological Diversity), Arlene Montgomery (Friends of the Wild Swan), Keith Hammer (Swan View Coalition), Martin Nie, Kari Gunderson, Luke Lamar, Marty Almquist, Jean Curtiss, Anne Dahl, Rachel Feigley, and Kelly Lynn (Montana Loon Society).

There will be serious, cumulative, irreversible consequences to the culture and ecology of the Swan Valley if this project moves forward. If the US Forest Service (USFS) does decide to advance it, an EIS should offer a revocation of the Special Use Permit (SUP) as an alternative to POWDR’s proposed action. The uncorrected mistakes in the SUP acreage already represent a profound abuse of the SUP privileges, and the expanded infrastructural and human-use impacts of POWDR’s SUP actions (on *and* off site) will not uphold legal responsibilities to the Endangered Species Act, Northern Continental Divide Ecosystem Conservation Strategy, Flathead National Forest Plan, and other core agreements that protect the species and connections of this place. The links between wildlife and wild land is the what is why this place is so vital to so many species, humans included. A robust EIS will almost certainly show that a resort is not only superfluous for honoring the wild connections tied to this place, but also that such a resort will degrade this fabric of life over time.

Despite POWDR’s repeated emphasis on sustainability, their proposal fails to acknowledge the absolute necessity of the precautionary principle, which should be an essential observance to safeguard the future of Holland Lake and the Swan Valley. The many protected and vulnerable species, the proximity to the Swan Front Recommended Wilderness and Bob Marshall Wilderness Complex, and the intact nature of the waters and wildlife habitats are just a few of the unique, indispensable aspects that deserve so much more precaution than POWDR has given to them. While I continue to respect POWDR’s nods towards environmental efficiency and human-wildlife conflict/impact reduction, these should be the start of baseline requirements to even be a SUP holder. POWDR is not going far enough to protect the wildlife and wild land, and given the contexts of biodiversity loss, climate change, and environmental injustice that already threaten this place, I urge the USFS to exercise more authority of its mission to “conserve the health, diversity, and productivity of the Nation’s forests and grasslands to meet the needs of present and future generations.” This present and future duty to public land is also an inherited responsibility to those who came before us. The Salish and Kootenai people from whom this land was taken have remained largely without mention through this process, and Indigenous people living today deserve so much better from the USFS and private partners in this proposal. We are at risk of losing trust, wildness, and the way those values were affirmed so recently in the Montana Legacy Project, but this is a once-in-a-lifetime chance to ensure we are able to pass on the incomparable gifts of Holland Lake and the Swan Valley. Please do not allow this project to proceed as proposed, and thank you again for considering my comments.

Best,

Rob Rich

APPENDIX 1: Rob Rich comment from 11 September 2022

Dear Ms. Shelli Mavor,

Thank you for the opportunity to submit comments and learn more about the Holland Lake Lodge Expansion Project in the September 8 open house. I am writing to oppose this project as described in POWDR's Master Development Plan (MDP).

I am concerned with the increased extent and intensity of human use as proposed in the MDP. The expanded human footprint will represent a substantial departure from current conditions, and the accumulation of such dramatic changes warrant a comprehensive, thorough environmental impact statement. A categorical exclusion for this project would overlook many important ecological, economic, and ethical concerns, not only regarding the obvious changes in the built environment, but also the externalities associated with increased use. The reasons I oppose the current MDP include:

This project increases the risk for Threatened, Endangered, and Sensitive species. The habitat in, around, and near Holland Lake is vital to many species protected at the state and/or federal level. Ongoing research has been monitoring many of these species' populations, and decision-making that prioritizes the future existence of these species is absolutely essential. Holland Lake and Creek is designated as critical habitat for bull trout, the surrounding lands are designated as critical habitat for Canada lynx, and – contrary to the statements on MDP 7.4 – grizzly bears are very active in the area. Each of these species is listed as Threatened under the Endangered Species Act (ESA). The wolverine, a current deserving candidate species for ESA listing that depends on remote habitats with reliable snowpack, also exists close to Holland Lake. And even more local species – such as the northern goshawk, common loon, black swift, or western toad, to name a few – are noted as Sensitive Species, Species of Concern, or both. Black swifts and common loons are of particular relevance around Holland Lake, and their specialized nesting requirements and low toleration for human disturbance makes them highly vulnerable to extirpation. Holland Lake also hosts an important source population of the North American beaver (a keystone species), and unique occurrences like the white glacier lily. Given the diverse, cumulative pressures this project could place on the protected and unique species of the area – on top of existing recreation and climate change concerns – I urge a more thorough consideration of the effects and mitigation needs beyond those mentioned in MDP Section 7.1.2.

Connectivity and function of habitat could suffer from the lack of detailed planning in this project. , This project has the potential to threaten the quality and integrity of habitat, even for species that are not protected or typically seen as unique. A 20-foot buffer from the lake is incredibly minimal, and especially if some of the trees and vegetation are removed near that distance, I would be concerned about erosion and the loss of shoreline habitat. Vehicle speed has increased significantly on the Holland Lake Road since it was paved, and I'm sure its frequency of use has grown as well. We already have major problems with wildlife-vehicle collisions in the Swan Valley, and I am concerned that the year-round growth in use and speed along Holland Lake Road for brief visits or meals at Holland Lake Lodge will add to these consequences. The land near Holland Lake provides important wintering habitat for deer and elk (and the carnivores who follow them), and they need to cross the road frequently. In a similar vein, people have made extensive social trails and lakeshore haul outs around the lake. While I appreciate the MDP's nod to improving social trail issues between the campground and the lodge (MDP 4.5.7), and I applaud the integration of efforts for bear aware education, protecting the night sky, and bird/waterfowl protection, I am concerned that the actual impacts associated with this venture may overwhelm their good intentions. An environmental impact statement should explore the multi-faceted effects associated with POWDR's impacts, and it should provide clear directives for the planning, education, and stewardship required to avoid habitat fragmentation.

There must be more attention given to water quality, waste, and invasive species issues. Tied to the above, the surge in human use will require much more nuance on the septic and waste management issues. Septic overloading is an important issue across lakes in northwest Montana, and an environmental impact statement should fully analyze this aspect before the project can proceed. Trash disposal has significant connections to wildlife safety and conservation, and I urge POWDR to demonstrate more awareness of and commitment to local and regional partnerships already working to address this issue. The same could be said for invasive species. The US Forest Service and partners have been working to eliminate an infestation of invasive fragrant water lily from Holland Lake, and to prevent the emergence of

aquatic invasive species like zebra mussels. This project should also demonstrate the awareness and action to extend these efforts.

POWDR's business model does not sound sustainable for the Swan Valley. In addition to the ecological concerns, POWDR's resorts and action sports/adventure companies do not sound like a good fit for the culture or economy of the Swan Valley. Holland Lake does not offer ski, rafting, or other high-impact recreation opportunities that occur at POWDR's other locations, and none of those places are as remote and ecologically intact as the Swan Valley. This leaves me concerned that POWDR has not fully invested in learning about this place. Does POWDR intend to offer experiences such as those that occur at its other locations? If it intends to do so with guides, is POWDR aware of the permit requirements for commercial use of public lands(including the limited permit availability)? Would POWDR be able to honor the group size and other necessary impact limitations designed to protect designated wilderness? The answers to these and related questions are not clear to me from the MDP. Also, as a year-round resident of the Swan Valley since early 2018, I am painfully aware of how difficult it can be to find places to live and work in our community, but I am concerned that POWDR's proposed operating seasons (May 15-October 15 and November 20-January 15) would encourage a transient workforce lacking the ability to know, respect, and steward this place. Entities that thrive in the Swan Valley often do so because they have limited infrastructure, and where infrastructure does exist, it often endures because it serves a community-oriented service. I do not sense that orientation in the MDP, and while I appreciate many of the design aesthetics and environmental efficiency improvements to the built environment proposed in the MDP, the extravagant expansion and maintenance associated with this project does not sound sustainable.

The MDP lacks the equitability and creativity to address core social-ecological needs for the conservation of and connection to wild places. As proposed, the MDP seems intent to serve a highly wealthy demographic (POWDR representatives at the September 8 open house suggested that typical lodging may be in the range of \$450/night). Even if that model does prove financially sustainable, it does not feel inclusive, equitable, or responsive to core inequalities that are challenging conservation today. I fear that this project could deepen these dilemmas, and do more to intensify outdoor recreation pressures instead of absorbing or moderating them. There is nothing inevitable about the Holland Lake Lodge property serving in the resort capacity that it has to date, and I believe the transfer of ownership at Holland Lake Lodge provides a crucial opportunity to slow down and creatively explore alternative options. One of these options should include the return of the property to natural habitat, given the abundant outdoor recreation opportunities that already exist in the Swan Valley (and Holland Lake, with its opportunities for boating, hiking, fishing, hunting, camping, Forest Service lease cabins, and more). And if the options do include a commercial venture at Holland Lake, I'd like to see it more directly endorse conservation goals and engage those who are not able to afford or access outdoor experiences. I am also particularly disappointed to see that this project makes zero mention of past debts or present/future commitments to the Salish and Kootenai people upon whose traditional territory Holland Lake Lodge site exists. In addition to (or as part of) pursuing an environmental impact statement, I would urge the US Forest Service to solicit alternative proposals for the equitable, conservation-oriented use of this land, as well as to conduct meaningful consultation with the Confederated Salish & Kootenai tribes on how this property could honor and grow the land's connection to Indigenous people.

Thank you for considering these concerns, and please let me know if you have any questions about them. The Swan Valley includes thoughtful people, ongoing research, and extensive resources with constructive insights to ensure a positive future for the Holland Lake Lodge property, and I urge this project to listen to the collective knowledge in our local community. There is also a growing body of topical research on many of the concerns I have raised here, and a recent report from Washington has some especially relevant insights for this project (Anna Machowicz, Carmen Vanbianchi, and Rebecca Windell. August 2022. *Recreation and Wildlife in Washington: Considerations for Conservation*, see here: <https://tinyurl.com/2h6363fm>). I hope this project improves with the robust environmental impact statement that it deserves, and I look forward to participating as it evolves.

Best,

Rob Rich