

October 7, 2022

United States Forest Service
Swan Lake Ranger
District Attn: Shelli Mavor (Holland Lake Lodge)
200 Ranger Station Road Bigfork, Montana 59911

Re: 1950 (0110): Proposed Holland Lake Lodge Facility Expansion

Submitted electronically via:
To: Flathead National Forest Supervisor Kurtis Steele,

Commercialization of wildlife habitat on public lands for corporate profit is wrong

We are 38 Montana professional wildlife biologists and habitat managers with a total of 1,196 years of experience who have served as university faculty, Commissioners on the Montana Fish and Wildlife Commission, or as professional agency staff with the U. S. Forest Service; Montana Fish, Wildlife, and Parks; U.S. Geological Survey; U.S. Fish and Wildlife Service; U.S. National Park Service; and Tribal wildlife agencies.

An “adventure lifestyle” corporation, Powdr Inc., has proposed to expand Holland Lake Lodge, which operates on public land via a USFS special use permit. This proposal is apparently fully supported by the Flathead Forest Supervisor who said: “*Improvements at the Holland Lake Lodge and the East Holland Lake Connector Trailhead would offer the opportunity to satisfy some of the increased demand for outdoor recreation on public lands in the Swan and Flathead Valleys.*” This project will not “satisfy increased demand for outdoor recreation” but instead will **massively increase demand** with many negative impacts of outdoor recreation in prime grizzly bear and lynx habitat.

The proposed development will triple lodging capacity and extend the operating season. It will also expand human influence far beyond the allotted 15-acres with increased visitor use and intensity of use. The season extension from Nov-Jan (the current season for the lodge ends mid-October) is significant as it extends and intensifies the potential for conflicts with bears, lynx, and with continued habitat disturbance. The combination of additional lodging rooms and season extension would increase the user days from 11,340 user days per year at present to 46,980 user days per year (overnight guests only). This means this proposal will result in 35,640 more user days each year on the public lands around Holland Lake.

These tens of thousands of additional users will not just stay at the 15-acre permitted lodge site. These people will be spending an additional 35,000+ days on the public lands around Holland Lake, on the Swan Face, the Mission Mountains, and in the Swan Valley. This additional use will have significant negative impacts on wildlife and wildlife habitat and will forever change the character of the Swan Valley.

Given what the Powdr corporation has done at their other properties, they will likely promote and market “adventure” recreation on adjacent public lands such as mountain

biking, mountain bike trail development, hiking, trail running, special pack trips into the adjacent Bob Marshall, skiing, XC skiing, and perhaps heli-skiing, helicopter sightseeing, and heli-hiking in the Swan and Mission Mountains as enticements to come to their new Holland Lake Lodge. This is commercialization of public lands for corporate profit at the expense of Montana's wildlife and wildlife habitat.

As professional wildlife managers and habitat managers we believe this proposed expansion of the Holland Lake Lodge is inappropriate for grizzly bear and lynx habitat, for the NCDE grizzly bear recovery zone, and for public lands in the Swan Valley. Approving this proposal will depart from the commitment the USFS made in the NCDE Conservation Strategy to manage public land in the NCDE Recovery Zone at or close to the baseline level of public land development that allowed the grizzly population to recover and remain healthy. The careful management of public land inside the Grizzly Recovery Zone is especially important as private land development in Montana rapidly accelerates with increasing risks to grizzly bears and other wildlife. As professionals, we request that the Flathead Forest reject this proposed commercial development and massive expansion of Holland Lake Lodge.

Sincerely,

Christopher Servheen, Ph.D.

35 years: U.S. Fish and Wildlife Service as Grizzly Bear Recovery Coordinator (retired).
Missoula, MT.

Richard Mace, Ph.D.

31 years: Montana Fish, Wildlife and Parks as Research Biologist (grizzly and black bears) (retired). Primarily responsible for grizzly bear population ecology research in the Northern Continental Divide Ecosystem. Kalispell, MT.

Harvey Nyberg, M.S.

26 years: Montana Fish, Wildlife and Parks, last job as Regional Supervisor (retired).
Lewistown, MT.

Gayle Joslin, M.S.

32 years: Montana Fish, Wildlife, and Parks as Wildlife Management Biologist and Research Biologist (retired). Helena, MT.

Bruce Sterling, M.S.

38 years: Montana Fish, Wildlife, and Parks as Management Biologist (retired).
Thompson Falls, MT.

Jim Vashro, M.S.

39 years: Montana Fish, Wildlife and Parks as fishery biologist and regional fisheries manager (retired). Kalispell, MT.

Diane Boyd, Ph.D.

23 years: 8 years Montana Fish, Wildlife and Parks as wolf upland bird biologist (retired), 15 years University of Montana as large carnivore researcher (retired). Kalispell, MT.

Ron Marcoux, M.S.

40 years: 22 years Montana Fish, Wildlife, and Parks as Biologist and Deputy Director (retired); 18 years with Rocky Mountain Elk Foundation in land conservation and administration (retired). Helena, MT.

Kristi DuBois, M.S.

34 years: 28 years Montana Fish, Wildlife and Parks as a wildlife biologist (both game and nongame) (retired); and 6 years US Fish and Wildlife Service as a wildlife biologist (retired). Missoula, MT.

Tim Thier, M.S.

32 years: 27 years Montana Fish, Wildlife and Parks as Wildlife Biologist (retired); 5 years US Fish and Wildlife Service as Wildlife Biologist (retired). Trego, MT.

Heidi B. Youmans, M.S.

27 years: Montana Fish, Wildlife, and Parks as Area Management Biologist, Upland Game Bureau Chief, Non-Game Bureau Chief (retired). Helena, MT.

Graham Taylor, M.S.

42 years: Montana Fish, Wildlife, and Parks as Area Wildlife Biologist and Regional Wildlife Manager (retired). Great Falls, MT.

Tim Manley, B.S.

37 years: Montana Fish, Wildlife and Parks in grizzly bear research (9 years) and as grizzly bear management specialist (28 years) (retired). Bigfork, MT.

Gary Wolfe, Ph.D.

47 years: 4 years as a Commissioner on the Montana Fish and Wildlife Commission, 12 years Vermejo Park Ranch Wildlife Biologist/Manager and big game Hunting Outfitter and Guide; 15 years Rocky Mountain Elk Foundation, Wildlife Biologist/Field Director, Director of Field Operations, Chief Operating Officer, President & CEO (retired); 11 years Vital Ground Foundation, Wildlife Biologist/Executive Director (retired). Missoula, MT.

Dan Vermillion, J.D.

13 years: Commissioner on the Montana Fish and Wildlife Commission. Livingston, MT.

Tim Aldrich, B.S.

4 years: Commissioner on the Montana Fish and Wildlife Commission. Missoula, MT.

Greg Munther, M.S.

32 years: U.S. Forest Service as Biologist and District Ranger (retired). Missoula, MT.

Chuck Schwartz, Ph.D.

36 years: 20 years, Alaska Fish and Game as Research Biologist (retired); and 16 years U.S. Geological Survey as Leader, Interagency Grizzly Bear Study Team (retired). Bozeman, MT.

Sterling Miller, Ph.D.

21 years: Alaska Fish and Game as Wildlife Management Biologist (retired). Affiliate Professor, University of Montana. Lolo, MT.

Dan Carney, M.S.

31 years: Blackfeet Tribe as Senior Wildlife Biologist (retired). East Glacier, MT.

William H. Geer, M.S.

40 years: 16 years as a fisheries research biologist, chief of fisheries and director of Utah Division of Wildlife Resources (retired); 24 years as a biologist with the National Fish & Wildlife Foundation, Rocky Mountain Elk Foundation and Theodore Roosevelt Conservation Partnership (retired). Lolo, MT.

Kate Kendall, M.S.

36 years: U.S. National Park Service and U.S. Geological Survey as research ecologist (retired). Columbia Falls, MT.

Glenn Elison, M.S.

25 years: U.S. Fish and Wildlife Service as Assistant Regional Director for Refuges and Wildlife (retired). Lewistown, MT.

Joe Fontaine B.S.

28 years: 6 years U.S. Bureau of Reclamation Wildlife Biologist, 18 years U.S. Fish and Wildlife Service as Deputy Wolf Recovery Coordinator (retired), 4 years as Deputy Project Leader National Wildlife Refuge Complex (retired). Helena, MT.

Dave Wesley, Ph.D.

25 years: 20 years Ducks Unlimited as Director of Field Operations (retired); 5 years Mississippi State University as Associate Professor (retired). Missoula, MT.

Mike Getman, M.S.

35 years: U.S. Fish and Wildlife Service as Wildlife Biologist (retired). Lewistown, MT.

Mary Maj, M.S.

32 years: U.S. Forest Service as District and Regional Wildlife Biologist, Resource Staff Officer, and District Ranger (retired). Bozeman, MT.

Dale Becker, M.S.

39 years: 7 years as a private wildlife consultant; 32 years Confederated Salish and Kootenai Tribes as Tribal Wildlife Program Manager. Polson, MT.

Edward Bangs, M.S.

36 years: U.S. Fish and Wildlife Service as Wildlife Biologist on Kenai NWR and Northern Rocky Mountain Wolf Recovery Coordinator (retired). Helena, MT.

Jim Claar: M.S.

32 years: 21 years U.S. Forest Service as Wildlife Biologist (retired), and 11 years Bureau of Indian Affairs as Wildlife Program Manager (retired). Missoula, MT.

Kerry R. Forsman, Ph.D.

37 years: University of Montana as Professor of Biology and Wildlife Biology (retired). Missoula MT.

Mike Phillips, M.S.

35 years: U.S. Fish and Wildlife Service Red Wolf Restoration Leader (retired); U.S. National Park Service Grey Wolf Restoration Leader (retired); Turner Endangered Species Fund Executive Director; Montana State Legislator 2006-2020. Bozeman, MT.

Wayne Hadley, Ph.D.

23 years: Montana Fish, Wildlife and Parks as fisheries biologist (retired). Deer Lodge, MT.

Lewis Young, M.S.

48 years: 31 years U.S. Forest Service as Wildlife Biologist and Wildlife Program Manager (retired); 17 years as consultant with U.S. National Park Service, Bureau of Land management, and Montana Fish, Wildlife and Parks (retired). Eureka, MT.

Mike Jimenez, M.S.

30 years: 20 years U.S. Fish and Wildlife Service wolf biologist and project leader; 10 years Nez Perce Tribe and Wyoming Game & Fish wolf recovery project leader; University of Montana wolf research (retired). Big Arm, MT.

Marion Cherry, M.S.

30 years: 8 years U.S. Forest Service as wildlife biologist; 22 years Gallatin National Forest as Wildlife Biologist and Grizzly Bear Habitat Biologist (retired). Bozeman, MT.

Wayne Hadley, Ph.D.

23 years: Montana Fish, Wildlife and Parks as fisheries biologist (retired). Deer Lodge, MT

Anne Vandehey, M.S.

22 years: U.S. Fish and Wildlife Service as a wildlife biologist as a Section 7 and grizzly bear biologist (retired). Helena, MT.

Dale Harms, M.S.

28 years: U.S. Fish and Wildlife Service and U.S. National Park Service (retired).
Helena, MT.