



Protecting Montana's wildlife, land, waters, and
hunting & fishing heritage for future generations.

September 28, 2022

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

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

Submitted electronically via: <https://cara.fs2c.usda.gov/Public//CommentInput?Project=61746>

To whom it may concern,

I write to you on behalf of the Montana Wildlife Federation (MWF). We are Montana's oldest and largest statewide conservation organization, founded in 1936 by dedicated hunters, anglers, conservationists, and landowners. Today we represent a diverse group of public land users and advocates who regularly and actively use the lands encompassed by the Flathead National Forest. We thank you for the opportunity to comment on the proposed Holland Lake Lodge Facility Expansion.

MWF's key priorities are the protection of wildlife, wildlife habitat, wildlife habitat security, and public access to public lands. Our comments are aimed at finding a balanced approach that encompasses scientifically based land and wildlife management, access to quality recreation, and the maintenance of healthy landscapes. We recognize the importance of properly managing the landscape encompassed by this project and the key role that public involvement plays in this process. We ask that you carefully consider our comments, suggestions, and objections regarding this proposal.

There has been much public dissatisfaction about the fact that the Flathead National Forest has said they were considering the use of a Categorical Exclusion on this proposed project. We agree with that dissatisfaction, but MWF does not believe that the Categorical Exclusion approach is the main concern with this project. Through intensified visitation and recreation, the proposed development and expansion at Holland Lake will have significant negative impacts on wildlife habitat and many species including grizzly bears and lynx, wolverines, furbearers, black bears, deer, and elk in the Swan Valley. These negative impacts to wildlife and wildlife habitat are our fundamental concerns about this proposed project. We detail these concerns below.

I. Departure from the NCDE Conservation Strategy

The NCDE Conservation Strategy¹ (Strategy) is the document designed to maintain a recovered genetically healthy grizzly bear population within the NCDE Demographic Monitoring Area (DMA) post-delisting. The proposed Holland Lake expansion is in prime grizzly bear habitat and well within the NCDE Grizzly Bear Recovery Zone and DMA. The Strategy states on p.16: "*The goal of habitat*

¹ <https://igbconline.org/document/ncdeconservationstrategy-3-25-20-pdf/>

management in this Conservation Strategy is to provide reasonable assurance that habitat on Federal, State, and Tribal lands will continue to be managed to levels that support a stable to increasing grizzly bear population in the NCDE. Therefore, the general approach is to maintain the habitat conditions that existed during the period when the NCDE grizzly bear population was stable to increasing.” The Strategy on p. 66² further states the importance of careful and cautious habitat management in the face of uncertainty about the challenges of increasing private land development and climate change to maintaining a healthy NCDE grizzly population.

During development of the Strategy, there was some discussion on p. 74 about allowing an increase in site developments in the PCA as follows: *“Limit the number and capacity of new developed recreation sites on Federal lands in the PCA that are designed and managed for overnight use by the public during the non-denning season to one new site per decade per BMU, or one increase in the overnight capacity at one site per decade per BMU above the baseline.”* During development of this clause, the Flathead Forest provided a two-page write up (see attached Planning Record Exhibit 00671) of examples of increased site developments to show examples of how past site developments were small and would have limited negative impacts on grizzly bears. Planning Record Exhibit 00671 showed that between 2000 and 2010 there were 10 overnight sites added in 8 Bear Management Units (BMUs). Most of these additions involved a cabin rental site or limited number of new sites at existing campgrounds. These examples were used by the USFS to assure those writing the Strategy that allowing one new developed site in a BMU per decade would have minimal impact on grizzly bears. This allowance of one new developed site per BMU per decade is being used to justify the proposed Holland Lake development as being within the standards of the Strategy. However, the proposed Holland Lake development will be orders of magnitude more than anything used as examples of possible site developments as shown in Planning Record Exhibit 00671. The Holland Lake expansion will more than triple the number of overnight rooms, extend the operating season, and increase the use of the area by 35,640 user days per year. This is a gross misuse of the allowance for minor additional site developments allowed inside a BMU in the Strategy. This amounts to a violation of the spirit if not the letter of the NCDE Conservation Strategy.

Allowing this commercial recreational development on public lands inside the NCDE PCA will also violate the specific wording in and intent of the Strategy as stated in footnote #2, specifically: *“We acknowledge that there is uncertainty as to whether the habitat management direction will be sufficient in the face of future ecological challenges such as private land development and climate change.”* The ecological challenges to grizzly bears of accelerated private land development and ongoing climate change in the NCDE are happening right now, yet this is a proposal for enhanced commercial recreational development and ancillary recreational impacts on top of some of the best remaining grizzly bear habitat in the NCDE.

II. The Proposed Development Will Have Significant Negative Impacts to Wildlife and Wildlife Habitat

The proposed development will do more than just triple lodging capacity. It will also expand human influence far beyond the allotted 15 acres by increased visitor use and intensity of use. The season

² *“We recognize that the five selected habitat conditions and management activities (secure core and motorized route density, developed recreation sites, livestock allotments, vegetation management, and mining and oil and gas development) do not capture all the environmental factors that can influence grizzly bear population growth. Many of the environmental, social, and economic factors influencing grizzly bear population status are outside the control of land management agencies, but we do have jurisdiction over these five important factors and can manage them in a manner that does not negatively affect the grizzly bear population. We acknowledge that there is uncertainty as to whether the habitat management direction will be sufficient in the face of future ecological challenges such as private land development and climate change. For this reason, regular monitoring of habitat conditions on Federal, State and Tribal lands, as well as development such as residential subdivision on private lands, will be conducted and evaluated over time. Furthermore, changes in multiple demographic rates will be monitored, not simply population size, as recommended by Doak (1995).”*

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 and habitat disturbance. The combination of additional lodging rooms and a 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). The current Holland Lake Lodge has had fairly low impact on wildlife and habitat because it has operated for decades at a modest size and has been closed during the winter months. Winterizing these facilities will increase the use season in the area. The previously unplowed roads leading to the lake will no longer be a winter refuge for animals or the remote ice fishing experience that many Montanans value.

The Powdr proposal completely and perhaps intentionally ignores the off-site impacts of this proposed development. Expanding development at Holland Lake will result in an additional 35,640 user days per year on public lands in the Holland Lake/Swan Valley area. These tens of thousands of additional users will not just stay at the 15-acre lodge site. These people will be spending an additional 35,000+ days on the public lands around Holland Lake, on the Swan Face, 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 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 and heli-hiking in the Swan and Mission Mountains as enticements to come to their new Holland Lake Lodge. The real attraction for Powdr corporation to invest in development at Holland Lake is access for their clients to the surrounding public lands in the Swan Valley. This is commercialization of public lands for corporate profit at the expense of Montana's wildlife and wildlife habitat.

The area around Holland Lake is well inside the Northern Continental Divide Grizzly Ecosystem (NCDE) Grizzly Bear Recovery Zone. It is high quality grizzly bear and lynx habitat as well as habitat for many other native wildlife species. The proposed development expansion at Holland Lake will have significant negative impacts to thousands of acres of wildlife habitat and many species including grizzly bears and lynx, wolverines, furbearers, black bears, deer, elk and all the wildlife in the Swan Valley as massive increases in recreation are promoted on adjacent public lands. Intensive recreation on public lands is a consumptive activity because it destroys wildlife habitat security.

Existing levels of human land use are a limiting factor on healthy wildlife populations across the western US. The negative environmental consequences of rural land development, including landscape fragmentation, have been widespread and extensive in the US (Gonzalez-Abraham et al. 2007³, Prato 2009⁴)⁵. Over 90% of the land in the Lower 48 states has been logged, plowed, mined, overgrazed, paved or otherwise modified from pre-settlement conditions (Terborgh and Soule 1999⁶). This emphasizes the importance of public land management agencies like the USFS being good stewards of the remaining public lands. The USFS should carefully consider the cumulative impacts of any public land

³ Gonzalez-Abraham, C., V. Radeloff, R. Hammer, T. Hawbaker, S. Stewart, and M. Clayton. 2007. Building patterns and landscape fragmentation in northern Wisconsin, USA. *Landscape Ecology* 22: 217-230.

⁴ Prato, T. 2009. Evaluating Tradeoffs Between Economic Value and Wildlife Habitat Suitability in Buffer Zones for Protected Areas in the Northern Rocky Mountains, USA. *Mountain Research and Development* 29: 46-58.

⁵ Schwartz, C. C., P. H. Gude, L. Landenburger, M. A. Haroldson, and S. Podrutzny. 2012. Impacts of rural development on Yellowstone wildlife: linking grizzly bear *Ursus arctos* demographics with projected residential growth. *Wildlife Biology* 18: 246-257.

⁶ Terborgh, J. and M.E. Soule. 1999. Why we need mega reserves: large-scale reserve networks and how to design them. In: Soule, M.E. and J. Terborgh. (Eds.); *Continental conservation: scientific foundations of regional reserve networks*. Island Press, Washington, DC, USA, pp.199-209.

development, especially in sensitive wildlife habitat like inside the grizzly bear recovery zone in the Swan Valley.

It is well documented in the peer-reviewed scientific literature that grizzly bears, elk^{7,8} and other species will usually flee humans on trails and avoid areas where recreating humans are present. For example, Coleman et al. (2013)⁹ documented that interactions between people on trails and grizzly bears less than 200 meters apart usually led to flight and avoidance by the bear. They also documented that such bear avoidance movements after encountering people along trails led to long distance movements of 300-400 meters to avoid the presence of people. This was far beyond mean or median bear movement distances. The results of Coleman et al. (2013) were consistent with other research on the reactions of bears when they find themselves less than 1 km from people (McLellan and Shackleton 1989¹⁰, Gunther 1990¹¹, Smith 2002¹², Sundell et al. 2006¹³, Moen et al. 2012¹⁴).

Increased recreation intensity in the Swan Valley because of this Holland Lake proposal will displace wildlife from formerly secure habitats into less secure areas where their mortality risk is higher. Intensive recreation will also increase stress levels and energetic demands on wildlife as they move away from human activity seeking areas of less human disturbance. Frid and Dill (2002)¹⁵ proposed that human disturbance was analogous to predation risk for wildlife with similar impacts on the disturbed animals including increased stress and heart rate, increased vigilance, higher energetic costs due to avoidance of people, displacement from preferred feeding and resting habitats, changes in diurnal and nocturnal activity patterns to avoid people, reduced energy intake due to avoidance of preferred habitats used by recreating people, and reduced survival of young and even adults because of the cumulative negative impacts of avoiding recreating people. The combination of impacts including more people coming to Montana and fueling accelerated private land development, climate change impacts to vegetation and habitats, and the massive increase in recreational pressure from this proposed Holland Lake development will have significant negative impacts on many wildlife species on public lands in the Swan Valley.

⁷ Naylor, L. M., M. J. Wisdom, and R. G. Anthony. 2010. Behavioral responses of North American elk to recreational activity. *Journal of Wildlife Management* 73: 328-338.

⁸ Wisdom, M. J., H. K. Preisler, L. M. Naylor, R. G. Anthony, B. K. Johnson, and M. M. Rowland. 2018. Elk responses to trail-based recreation on public forests. *Forest Ecology and Management* 411: 223-233.

⁹ Coleman, T. H., C. C. Schwartz, K. A. Gunther, and S. Creel. 2013. Grizzly bear and human interaction in Yellowstone National Park: an evaluation of bear management areas. *Journal of Wildlife Management* 77: 1311-1320.

¹⁰ McLellan, B. N., and D. M. Shackleton. 1989. Immediate reactions of grizzly bears to human activities. *Wildlife Society Bulletin* 17: 269-274.

¹¹ Gunther, K. A. 1990. Visitor impact on grizzly bear activity in Pelican Valley, Yellowstone National Park. *International Conference on Bear Research and Management* 8: 73-78.

¹² Smith, T. S. 2002. Effects of human activity on brown bear use of the Kulik River, Alaska. *Ursus* 13: 257-267.

¹³ Sundell, J., I. Kohola, and I. Hanski. 2006. A new GPS-GSM-based method to study behavior of brown bears. *Wildlife Society Bulletin* 34: 446-450.

¹⁴ Moen, G. K., O.-G. Støen, V. Sahle'n, and J. E. Swenson. 2012. Behavior of solitary adult Scandinavian brown bears (*Ursus arctos*) when approached by humans on foot. *PLoS ONE* 7:e31699.

¹⁵ Frid, A. and L. M. Dill. 2002. Human-caused disturbance stimuli as a form of predation risk. *Conservation Ecology* 6: 11. [online] URL: <http://www.consecol.org/vol6/iss1/art11>

III. Conclusion

MWF is an advocate for public land and access, but we believe that there needs to be a balance between human development and wildlife and habitat conservation. We do not believe that this proposed expansion of the Holland Lake Lodge is in any way appropriate. It will produce cumulative negative impacts on grizzly bears and grizzly bear habitat. It ignores the enormous negative impacts to wildlife that will occur with this lodge expansion due to increased recreation on public lands outside the 15-acre lodge site. Approving this proposal will fail to abide by the spirit of the Conservation Strategy to manage public land in the NCDE recovery zone to assure the maintenance of a healthy grizzly bear populations in the face of increased private land development and ongoing climate change. For all these reasons and the issues detailed in this comment letter, we request that the Flathead Forest reject this proposed commercial development of Holland Lake Lodge.

Thank you for fully considering our comments and requests on this proposed action.

Sincerely,

Christopher Servheen, Ph.D.
President and Board Chair
Montana Wildlife Federation

Planning record exhibit 00671
Background Information on NCDE GBCS Developed Recreation Increase of One Overnight Site
Per BMU Per Decade
Kathy Ake, NCDE GIS Specialist

When NCDE Conservation Strategy team (or Grizzly Bear Conservation Strategy committee) discussed the baseline, they discussed the need to have a regulatory framework for increases in developed recreation to limit increases in the risk of grizzly bear-human conflicts. The NCDE Conservation Strategy team considered the following during development of developed recreation site standards:

I contacted Glacier NP and the 5 forests in the Recovery Zone (or Primary Conservation Area) to get information about projects that had gone through consultation with US FWS between 2000 and 2010. In the NCDE, there were increases and the number and capacity of developed recreation sites that occurred during this time period. At the time when this information was gathered, we did not distinguish between overnight and day use developed recreation sites.

Of the 23 BMUs, 13 had changes.

- Of those 13, 9 BMUs were known to have at least one increase in capacity or number for overnight developed recreation sites. Of those 9, 4 BMUs had more than one increase in number or capacity.
- Of those 13, 9 BMUs were known to have increases in the number or capacity of day use sites. Of these 9, 5 BMUs had more than one increase in number of capacity.

Eight BMUs were known to not have any increases: 2 of these are totally in wilderness (CODV, NFSR); 3 are partially in wilderness (UMFF, USFF, DELK); and 3 are not in wilderness (RTSN, TESR, BATM). No information was provided or known for two BMUs (STRV, MSRG).

Overnight sites

Summary: 10 new overnight sites in 8 BMUs, 6 increases in capacity in 5 BMUs

- UNFF: 1 new cabin rental (Ben Rover), 1 existing cabin rental capacity increase (Wurtz)
- LNEF: 2 new concierge employee dorms (Lake McDonald)
- HGHS: 1 new campground (Doris), 1 new cabin rental (Anna Creek), 1 increased capacity at campground (Riverside), 1 increased capacity at campground (Murray Bay)
- SLVN: 1 new cabin rental (Swan Guard Station), 1 increased capacity at campground (Swan Lake)
- BNKR: 1 new cabin rental (Silvertip)
- BGSM: 1 new cabin rental (old Condon Ranger Station)
- MLFK: 1 new cabin rental (Monture Guard Station)
- BITE: 1 increased capacity at campground (Cade Mtn)
- SUBW: 1 recreation residence restored (Kenck) and added as a new cabin rental, 1 increased capacity at campground (Wood Lake)

On NFS lands, some of these projects were required to mitigate increases in number or capacity of overnight developed recreation sites through consultation with the US FWS. In these cases, the USFS could mitigate for increases by reducing the number or capacity of overnight developed recreation sites in

the same BMU (see BO for Eastside Hungry Horse Reservoir Project or Anna Creek Cabin Rental Projects as an example).

Day use sites

Summary: 8 new day use sites in 6 BMUs, 9 expansions of existing day use sites in 7 BMUs.

- MULK: 1 new trailhead, 1 expansion of trailhead (both under current planned project)
- LNFF: 1 new site (Apgar Transit center), 1 new site (visitor information turnout), 1 expanded parking at trailhead, 1 expanded parking area
- LMFF: 1 expanded parking at trailhead (Stanton Lake)
- NEGL: 1 new site (St. Mary Transit center), 1 new site (restrooms), 1 expansion of site (Logan Pass restrooms)
- SEGL: 1 new site (ticket office)
- HGHS: 1 new board launch & parking lot (Doris), 1 increased capacity of boat launch & parking (Riverside)
- BNKR: 1 new trailhead (Trail Creek)
- MFLK: 1 expanded outfitter parking (Indian Meadows)
- BITE: 1 expanded parking at trailhead, 1 expanded capacity (Teton Ski Area capacity increased 10-20% day use only)

A standard limiting overnight developed recreation sites and a guideline addressing both overnight and day use sites was incorporated in the revised forest plan and amendments to reduce the risk of grizzly bear-human conflicts.