



Region One
490 North Meridian Road
Kalispell, MT 59901
(406) 752-5501
October 4, 2022
Ref # 13-10-04

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

Re: Holland Lake Lodge Facility Expansion

Dear Shelli:

Thank you for the opportunity to comment on the proposed Holland Lake Lodge Facility Expansion Project. The proposal calls for construction of a new 13,000 sf 28-room main lodge, numerous lake cabins and bunk houses, and other amenities, increasing the capacity of the lodge from 50 to 156 overnight guests, as well as expanding day-use visitor capacity.

The 400+ acre Holland Lake provides important fish and wildlife habitat. The lake supports a productive fishery, including populations of the threatened bull trout and westslope cutthroat trout. Loons consistently nest on Holland Lake just north of the Lodge, successfully raising chicks in three of the last four seasons. Increased recreational activity, both motorized and non-motorized, can deter loons from nesting in the future or result in nest failure. Holland Lake and the surrounding area is prime habitat for big game, black and grizzly bear, mountain lion, lynx, wolverine, and numerous other mammal and bird species, and provides winter range for white-tailed deer and elk. In addition, The Lodge is located adjacent to the popular Holland Lake Trailhead, providing access to Holland Lake Falls, Upper Holland Lake, and the Bob Marshall Wilderness.

Development Recommendations

In 2012, Montana Fish, Wildlife and Parks (FWP), adopted its Fish and Wildlife Recommendations for Subdivision Development in Montana as a working document to guide FWP's comments on subdivisions and development proposals. Comments provided here stem directly from the design standards recommended in that document. That document is available online at:

<https://fwp.mt.gov/conservation/living-with-wildlife/subdivision-recommendations>

Water Quality:

To protect water quality, FWP's design standards for lake developments recommend a minimum of 100 feet of vegetated buffer plus an additional 30-foot building setback (a 130-foot no-build zone adjacent to lake shores). In its current state, the shoreline around Holland Lake Lodge is impacted by decades of concentrated recreational use. Turf fronts areas around the established lodge and adjacent buildings, stabilizing vegetation such as trees and shrubs are absent in many areas, shoreline banks are steeply cut, and the function of the existing 20-ft shoreline protection zone is well compromised. The current proposal, which calls for parking for 126 vehicles, net construction of an additional 27,800 sf of structures, and clearing of vegetation up to the 20-foot shoreline protection zone established by Missoula County, leaves little room for limiting runoff and preventing impacts to water quality. The development plan makes no mention of stormwater management. To protect water quality, FWP recommends improvements work within established building envelopes, locate new building construction outside the recommended 130-foot set back, and maintain established vegetation within 100 feet of the shoreline. Additionally, FWP recommends that the proposed project adheres to Montana DEQ's state water quality standards, and that the sewage/septic meets requirements established by Missoula County.

Wildlife Attractants/Wildlife Conflicts/Living with Wildlife

A concern with any development is the potential for attractants to bring wildlife into conflict with people. Garbage, pet foods, bird feeders, barbecue grills and fire pits, livestock feed, and anything that looks or smells like food to a bear is an attractant that too often leads to the death of the bear. This past summer FWP Wildlife Conflict Specialists responded to a black bear that was getting into garbage, testing bear-proof dumpsters and breaking into cars at the Lodge. Bears, including grizzly bears, are active around Holland Lake, and this past year saw several conflicts with habituated black bears. Eliminating attractants, sound management of garbage and recycling, and educating visitors about food storage practices will be critical. The proposal's Master Development Plan outlines several steps to help mitigate attractants, including bear resistant garbage and recycling receptacles, daily collection, refuse storage in a bear-proof facility, and regular trash removal. In addition, FWP recommends that the lodge advise visitors against storing food in cars and provide education materials to all guests detailing food storage practices and other strategies to avoid conflicts with wildlife.

As proposed, the Master Development Plan for Holland Lake Lodge maximizes overnight and day use capacity with little accommodation for resource protection, particularly protection of water quality. The Master plan makes no mention of management of stormwater generated by increases in impervious surfaces, and rests much of its water quality protection measures on the preservation of an already compromised 20-foot shoreline protection zone.

Deer and Elk Habitat

Holland Lake and the surrounding area supports one of the largest elk herds in the Swan Range, and the area provides critical winter range for deer and elk. In recognition of this fact, the Rocky Mountain Elk Foundation recently purchased for conservation 640 acres of surrounding private land to protect elk wintering areas. Proposed increases in winter occupancy of the Holland Lake Lodge could fragment this

wintering area and displace large wintering concentrations of elk that currently utilize the area around Holland Lake. Impacts to winter range are cumulative, and the trend of accelerating development places greater value on those relatively intact landscapes, such as that around Holland Lake. The Holland Lake Lodge Master Development plan calls for winterization of all new construction and accommodation for a winter season extending into mid-January. Given that disturbance and displacement during the latter winter months are particularly stressful for wildlife, FWP recommends against extending the visitor season beyond mid-January.

Concerns for Native Fisheries

Holland Lake contains a diverse fishery comprised of both native and non-native fish. Of particular interest is a small disjunct population of bull trout, a species listed as threatened under the Endangered Species Act. Current fishing regulations specify that it is illegal to intentionally target bull trout in Holland Lake. Current angler use in Holland Lake is relatively low, and incidental catch of bull trout is not considered to be impacting the population. The proposed project has the potential to increase lake use, and angling could subsequently increase as well. However, adherence to the current angling regulations will continue to protect this vulnerable fish population. Because visitor use will likely increase, educational materials highlighting the importance of bull trout should be available at the lodge. FWP can provide these materials as needed.

Thank you for the opportunity to provide comments. If you have any questions, please feel free to contact area wildlife biologist Franz Ingelfinger at (406) 751-4580, FIngelfinger@mt.gov, or Fisheries Biologist Leo Rosenthal at (406) 751-4548, LRosenthal@mt.gov.

Sincerely,

Lee Anderson

Lee Anderson
Region 1 Supervisor