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Organization: None

Remain on project mailing list: yes

Hello Shelli,

Wow, did this project proposal explode! So many comments and here I am adding to them, but I hope they are helpful to you. I (Marsha Moore) was on the Forest Plan revision team as the recreation/wilderness/WSR specialist and retired a couple years ago. I am a proponent of sustainable recreational use on national forest system lands, but the scope of this project is beyond what the Forest Plan ever envisioned (see standard FW-STD-REC 01 below). There is key information missing in the scoping notice regarding grizzly bears and develop recreation sites that should have been in the scoping notice.

While I do appreciate the use of the desired conditions for MA-7 for Holland Lake, it goes hand-in-hand with applicable standards and guidelines. It was never the intention to enlarge and increase the use levels associated with this project; any updates to the resort must meet standards and guidelines listed in the Forest Plan.

### Project and activity consistency with the forest plan (Forest Plan, page 3)

As required by the National Forest Management Act of 1976 and the 2012 planning rule, all projects and activities authorized by the Forest Service after the record of decision for the forest plan must be consistent with the applicable plan components (16 U.S.C. 1604 (i)) as described at 36 CFR § 219.15 (c and d)). A project or activity approval document must describe how the project or activity is consistent with applicable plan components by meeting the following criteria (36 CFR § 219.15(d)):

 1. Desired conditions and objectives. The project or activity contributes to the maintenance or attainment of one or more desired conditions or objectives or does not foreclose the opportunity to maintain or achieve any desired conditions or objectives over the long term.

2. Standards. The project or activity complies with applicable standards.

3. Guidelines. The project or activity i. complies with applicable guidelines as set out in the plan or ii. is designed in a way that is as effective in achieving the purpose of the applicable guidelines (§ 219.7(e)(1)(iv)). I am a proponent of recreational use on national forest system lands, but the scope of this project is beyond what the Forest Plan ever envisioned. There is key information missing in the scoping notice regarding grizzly bears.

## Grizzly Bear

*Developed Recreation Standard* (FW-STD-REC 01) (page 60 of the Forest Plan)

Within the NCDE primary conservation area, the number and capacity of developed recreation sites on NFS lands that are designed and managed for overnight use by the public during the non-denning season (e.g., campgrounds, cabin rentals, huts, guest lodges, recreation residences) shall be limited to one increase above the baseline (see glossary) in number or capacity per decade per bear management unit. The following conditions are not considered an increase from the baseline:

* the agency obtains better information or updated information in its database(s);
* the agency acquires land that contains developed recreation sites;
* the agency increases the number or capacity of a developed recreation site in order to comply with Federal laws;
* the agency maintains or modifies an existing overnight developed or dispersed recreation site in such a way that does not increase the number or capacity of the site (e.g., installing a pit toilet to avoid damage to water resources or installing a bear-resistant food storage structure to reduce grizzly bear-human conflicts);
* the agency modifies an existing developed recreation site to enhance human safety (e.g., enlarging a road pull-out to allow trailers to turn around safely); or
* the agency operates a developed recreation site to allow overnight use only during the denning season (see glossary)
* The agency makes a corresponding reduction in the number or capacity of overnight developed recreation sites in the same bear management unit through any of the following means: (1) equal reduction in capacity at another site; (2) closure of a developed site(s); or (3) consolidation and/or elimination of dispersed camping, when and where it can be enforced effectively and it is reasonably assured that new dispersed sites will not develop nearby. Note: If these measures are used to offset an increase in number or capacity, they must be in place before the initiation of the increase. If the agency reduces the number or capacity of developed sites below baseline levels, these reductions may be used at a future date to mitigate equivalent impacts of an increase, expansion, or change of use in developed sites within that bear management unit.

Note: This standard does not apply to dispersed recreation sites or to developed recreation sites managed for day-use only (e.g., outfitter camps, roadside trail crossings or interpretive pull-outs; trailheads, picnic areas, or boat launches that are closed at night; ski areas that do not have overnight lodging).

### Table 104 from the EIS for the Forest Plan

Capacity of overnight developed sites (NCDE definition) on the Forest within the primary conservation area

|  |  |
| --- | --- |
| Site type | Capacity |
| Campground | 552 |
| Cabins | 48 |
| Residence | 63 |
| Rooms in Lodges | 13 |
| Bunkhouses | 7 |

*In the NCDE, measurement of capacity varies by site type. Campground capacity is defined as the number of sites in the campground;* ***cabins*** *and residences as the number of cabins and residences;* ***lodge capacity as the number of rooms****; and* ***bunkhouses as the number of bunkhouses***

Comment: Holland Lake Lodge is within the primary conservation area. There was nothing in the scoping notice that spoke to this standard nor really any information about the requirements regarding grizzly bears in the forest plan. HLL is within the Big Salmon grizzly bear management unit and Buck-Holland grizzly bear sub-unit. There is a spreadsheet that documents the baseline data for **overnight develop sites** in each of the grizzly bear management units and possible the grizzly bear sub-units as well. I could not find it in the EIS or planning record index for the forest plan revision, but Kathy Ake would have a copy of this, as it should be used for monitoring purposes. It is projected to increase from 50 overnight guest to 156 overnight guest; and 12 employees to 17 (the additional 5 RV spots for employees) is 111 **new** overnight accommodations!

Abiding by this standard, the proposal **must only allow the Holland Lake Lodge to increase by 1 lodge room, and/or by one cabin**. This obviously isn’t the case with the proposed project. Currently for overnight guest, it consists of 13 lodge rooms (I think 13 rooms, I could not get this info from the scoping notice), 6 cabins, and the manager’s house. The proposed project would increase the number of overnight rooms in the lodge to 28, 10 new lake cabins and 16 studio cabins.

There would need to be several campgrounds or dispersed sites shut down in the grizzly bear management unit to accommodate this increase and I’m pretty sure the public would not go for closing public camping sites down to build a lodge on public land that charges a fee to stay at.

The environmental analysis is **required** to show how it will meet this standard with this project. This standard was based on the Northern Continental Divide Grizzly Bear Conservation Strategy; are you planning to amend this standard?

From the Forest Plan EIS: Although the majority of these mortalities occurred on private lands, the risk of grizzly bear mortality at developed recreation sites on public lands in the recovery zone/primary conservation area remains of concern because grizzly bear-human conflicts have occurred at developed recreation sites on NFS lands in the past. The Forest’s food storage orders are highly effective at reducing the risk of grizzly bear-human conflicts. As a result, the draft Grizzly Bear Conservation Strategy includes measures that would allow a slight increase in the number and capacity of overnight developed recreation sites within the recovery zone/primary conservation area, but this increase would be limited to further reduce the risk of conflicts (see the sections on consequences specific to each action alternative for more details).

## Accessibility

There was nothing in the scoping notice that spoke to the accessibility of any new buildings on federal land. Below is the rehabilitation Act that Holland Lake Lodge falls under. Everything that is being proposed must be made accessible. Even the employee housing.

Rehabilitation Act of September 26, 1973 (Pub. L. 93-112, Title V, 87 Stat. 390, as amended; 29 U.S.C. 791, 793-794, 794a, 794b): This act requires that programs and activities conducted by Federal agencies and by entities that receive funding from, or operate under a permit from, Federal agencies provide an equal opportunity for individuals with disabilities to participate in an integrated setting, as independently as possible. The only exception to the requirement is when the program would be fundamentally altered if changes were made solely for the purpose of accessibility.

The Forest Plan does not have specific plan components on accessibility because it is already cover through law (above) and the directives.

To meet laws and the FS directives, any renovation or new construction must include accessibility requirements in the decision document and within the design criterion. In addition, a landscape architect must be part of the core interdisciplinary team.

In the Holland Lake Lodge operating practices (which I found as a strange thing to put into a scoping letter and it didn’t really say how they were to be used in the project), it states: Designing public building exteriors in the style of modern Adirondack architect to keep the fundamental character of the Holland Lake Lodge intact.” The Built Environment Image Guide that is referred to in the scoping document is what is needed to help guide any design. Modern Adirondack design should be changed to fit what the Built Environmental Image Guide (thanks for adding that into the scoping notice!).

Forest Plan: (FW-GDL-SCN-01) To ensure consistency with the desired scenic character of the Forest and with the historical and cultural influences of the broader area, the construction or reconstruction of Forest Service facilities (recreation, fire, administrative, and other) and permitted facilities should be consistent with the Built Environment Image Guide.2020 USDA (2001).

The Built Environment Image Guide for the national forests and grasslands, Washington, DC: USDA Forest Service, retrieved from <https://www.fs.fed.us/recreation/programs/beig/01_frontmatter.pdf>.

## Wilderness and recommended wilderness

Will there be any outfitting and guiding activities in wilderness with this new permit? If so, please be specific on what, when, and other relevant information and how they would impact the designated and recommended wilderness.

There needs to be an in-depth analysis on how this increase in users associated with the new permit would impact the wilderness and recommended wilderness areas close by the permit area. The trailhead into the Bob Marshall Wilderness is already a highly used trailhead.

## MA-7 areas

Holland Lake Campground (GA-SV-MA7-Holland Lake) This area encircles Holland Lake in the south end of the Swan Valley. It includes the Holland Lake developed campground and day-use areas, and the Owl Creek Packer Camp. Camping, boating, swimming, horseback riding, fishing, and hiking are popular uses of this area. An interpretive nature trail is located near the campground. This area also encompasses the popular Holland Falls National Recreation Trail, a 1.6-mile trail that follows the lake shoreline to the base of Holland Falls at the head of the lake. The Holland Lake area is also a popular access point to the trail system in the Bob Marshall Wilderness Complex. The recreation opportunity spectrum setting for the summer season is roaded natural, and it is semiprimitive motorized for the winter season. Roaded natural provides a natural-appearing landscape that supports higher concentrations of use, user comfort, and social interactions with a well-defined road system. Facilities are well maintained to protect Forest resources and are updated as needed to accommodate current and anticipated recreational use. The winter semiprimitive motorized setting provides opportunities for exploration and challenge in backcountry skiing and snowmobiling opportunities. Routes are typically ungroomed but are often signed and marked, with additional areas for traveling cross-country.

Desired conditions (GA-SV-MA7-Holland Lake-DC) 01 Holland Lake Campground and associated recreational facilities provide quality visitor experiences in a natural setting. Facilities are maintained to a standard that protects Forest resources and are updated as needed to accommodate current and anticipated recreational use.

Comment: This area around the lake and the lodge itself was anticipated to have higher recreation use as denoted by the MA-7 management area designation. Mostly in day-use and some overnight use in the campground. A gradual increase in use rather than such a huge jump in overnight use numbers from this proposed project. I’m not sure why POWDR came up with such a proposed expansion for this area given the grizzly bear constraints, the existing infrastructure and the natural setting that exists now. Nor how the FS went out with a scoping notice without proper vetting. The project needs to be within the constraints of the standards and guidelines of the Forest Plan. That is, slight increase in overnight accommodations.

Therefore, the proposed action needs to be adjusted to fit the developed recreation/grizzly bear standard. Perhaps there may be additional increase in overnight use by closing other developed sites in the grizzly bear management unit though I image that would not be a popular move with the amount of publicity this project has generated. I do thing that the project scaled down would be a good project – those buildings are in dire need of renovation. Part of that is the FS fault for allowing it to get that way. I do like the new trail proposal.

I think increasing use in the winter months (denning season) at HLL would be a good option with cross-county skiing and snowmobiling highlighted. This would be more aligned with the grizzly bear standards though other standards such as standards for wolverines may come into play. Currently the permit is only for May through October. I can’t recall if the proposal was changing this to be year-round. If it will be changed, the analysis must reflect this change in the permit.

Good luck with the project! I hope next time a project scoping goes out a little more time spent reviewing the Forest Plan and the plan components is done. I’m sure you have received many comments on the proposed CE so I’ll let other public comments address that issue. Shelli you may contact me if you have any specific questions regarding the Forest Plan. Just a note on sustainable recreation – it’s sustainable if other resources are taken into consideration.

Regards,

Marsha Hettick