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RE: Holland Lake Lodge Facility Improvement & Expansion Project

To Whom it May Concern,

Swan Valley Connections (SVC) is a nonprofit organization at the confluence of conservation and education located in Condon, Montana. Our mission is to inspire conservation and expand stewardship in the Swan Valley and our vision is that through exemplary stewardship, the Swan watershed and adjacent landscapes remain wild and resilient where all people are connected to the natural world. We value:

?the responsibility to protect one of the last best, wild places on Earth;

?the abundance of public lands, the legacy that led to their conservation, and our responsibility to protect and steward them in perpetuity;

?the critical role private land stewardship plays in maintaining high quality habitat and the health of the land and all its inhabitants;

?experiential learning that informs and inspires individuals of all ages to care for the natural world and be leaders in conserving it;

?partnerships and collaborative decision-making that integrates science and local knowledge to support sustainable land management practices;

?traditional ecological knowledge and the role of indigenous people in current and future conservation, as the Swan Watershed has been used by many tribes and is the aboriginal land of the Salish and Kalispel people;

?community involvement and the use of local, qualified contractors and the work it provides for the regional economy.

We keep our mission, vision, and values at the forefront of all we do, as our staff and board members care deeply about the well-being of our watershed and ecosystem, and recognize that humans have been a part of this ecosystem since time immemorial. With this in mind, we would like to submit the following comments, questions, and concerns to the U.S. Forest Service (USFS) regarding the The Holland Lake Lodge Master Development Plan (henceforth HLL MDP or "the plan").

We would first like to acknowledge that one of the shareholders of Holland Lake Lodge Inc., Christian Wohlfel, is a member of SVC's board of directors. He has not discussed the project in detail with staff or board, and per SVC's Conflict of Interest bylaws has recused himself from any discussion that the board and staff have about submitting comments for the proposal. Our board members are committed to declaring any potential conflicts of interest, and recusing themselves accordingly. Holland Lake Lodge is a private, for profit business that is kept completely separate from any business of Swan Valley Connections. The role of a nonprofit board is to be the fiduciaries who steer an organization toward a sustainable future by adopting sound, ethical and legal governance and financial management policies and making sure the nonprofit has adequate resources to advance its mission. Board members provide foresight, oversight and insight for the organization, and adhere to high ethical standards.

Holland Lake and the surrounding public and private lands will be significantly impacted by the HLL MDP as currently written. The extent of these impacts, both positive and negative, must be thoroughly analyzed and we request that the USFS conduct an Environmental Assessment or Environmental Impact Statement. Tripling the

current guest capacity and extending the current season(s) of use, while allowable within the Special Use Permit, will bring significantly more people to our rural valley.

We support connecting people to nature and recognize that Holland Lake is identified as a "focused recreation area" in the Flathead National Forest 2018 Land Management Plan, but we are concerned about the potential negative impacts increased recreation and development will have on wildlife, fish, aquatic invasive species, other visitors' experiences, the Swan Front recommended wilderness area, and adjacent public lands.

Wildlife

Concerns: Increased human-bear conflict and negative effects to wintering ungulates and nesting loons

I. Human-Bear Conflict

The HLL MDP states, "According to management, over the last 17 years, there has never been a grizzly sighting at Holland Lake Lodge. Nor are we aware of grizzly bears at Holland Lake or on the Holland Falls Trail. Black bear sightings do happen from time to time." This mischaracterization of bear activity in the area is concerning to us because currently Holland Lake campground and the cabins on the south side of the lake are experiencing severe human-bear conflicts, where habituated bears are attempting to break into vehicles and cabins to obtain food. We are encouraged that the plan describes efforts to educate the public, lend out bear spray and utilize bear resistant waste management techniques, however we are concerned that the increase in recreation will both lead to more conflict (via increased probability of human-bear encounters and increased opportunities for improper food storage) and displacement of bears and other wildlife.

The Flathead National Forest 2018 Land Management Plan writes that "within each bear management unit in the primary conservation area, increases in the number and capacity of developed recreation sites (NCDE definition) on NFS lands that are designed and managed for overnight use during the non-denning season are at levels that contribute to sustaining the recovery of the grizzly bear population in the NCDE." (pg 58). Will this increase in capacity in the Big Salmon BMU within the PCA contribute to sustaining the recovery of the grizzly bear population in the NCDE? Will the USFS subsequently increase law enforcement, recreation managers and/or bear managers to mitigate human-bear conflicts?

II. Winter Range

The Flathead National Forest 2018 Land Management Plan notes "winter habitat for big game species in the Swan Valley (determined in cooperation with MFWP), from the Holland Lake area on the south to the Swan Lake State Forest boundary on the north, provides desired winter habitat conditions, including snow intercept cover" as a desired condition to be maintained. While we are not necessarily concerned about snow intercept cover within the building envelope of HLL (and in fact support fuels reduction around buildings), we are concerned about an increase in winter recreation to an area that serves as some of the best winter range in the valley and currently sees very little winter recreation. Has the USFS analyzed the impacts of more winter recreation and the potential displacement of wintering ungulates in the area?

III. Loons

Loon nest abandonment caused by human disturbance (both motorized and non-motorized) is well documented. Currently, the HLL MDP describes the known loon nest in the wrong location. In 2021, there were only three lakes in the Swan watershed that had successful nesting pairs of loons, one of which was Holland Lake. Has the USFS analyzed the impact of more recreation users, a float dock, and more cabins will have in such close proximity to the nesting loon pair?

Fish, Water Quality, Aquatic Invasive Species

Concerns: negative impacts to bull trout, water quality, and increased risk of AIS introduction.

I. Bull Trout

Holland Lake and Holland Creek serve as Critical bull trout habitat and spawning grounds, thus Holland is named

as a conservation watershed in the Flathead National Forest 2018 Land Management Plan. The desired condition of conservation watersheds as described in the forest plan include "high-quality habitat and functionally intact ecosystems that are contributing to and enhancing the conservation and recovery of specific threatened or endangered fish species or aquatic species of conservation concern and providing high water quality and quantity. The watersheds contribute to the conservation and recovery of native fish and other aquatic species and help make habitat conditions more resilient to climate change." (pg 18). Does the USFS have a monitoring plan in place to understand how increased recreation and possible increased anglers will impact bull trout and make habitat conditions more resilient to climate change?

II. Water Quality and AIS

Holland Lake and the Swan Valley are the headwaters of the Columbia River Basin, one of the few watersheds left in the lower-48 that maintain high water quality and remain free of zebra mussels. Unfortunately, Holland Lake does contain other aquatic invasive species such as fragrant water-lily and non-native fish such as lake trout. These invaders are generally introduced by recreationists that unknowingly bring contaminated boats and knowingly illegally introduce non-native fish into popular waters. Increased recreation not only increases the possibility of AIS in Holland Lake, but also of contaminating the larger watershed downstream and diminishing water quality. We are supportive of HLL offering non-motorized boat rentals, as this could potentially reduce the number of contaminated boats entering the water, however this does not address the potential increase in motorized boats entering the lake to use the new restaurant or other facilities. Additionally, a 20 foot shoreline setback appears insufficient to reduce erosion and maintain water quality. We ask that the USFS adequately assess all potential threats to water quality including but not limited to AIS, shoreline erosion, and wastewater management.

Swan Front Recommended Wilderness and Surrounding Public Lands

Concerns: Increased impacts to

I. Recommended Wilderness, Sustainable Recreation, and Visitor Experience

The Flathead National Forest 2018 Land Management Plan describes many desired conditions that potentially conflict with the HLL MDP, including:

*"The development scale of recreation facilities is consistent with the desired recreation opportunity spectrum settings and with river management and trail management plans." (pg 58);

*"Sustainable recreation opportunities are responsive to changing conditions due to system stressors such as climate change and changing use patterns and demands."(pg 59);

*"There are sustainable dispersed recreation opportunities across the Forest. Dispersed recreation opportunities are compatible with the desired recreation opportunity spectrum setting and are managed to reduce the risk of user conflicts and environmental impacts." (pg 59);

*"Recommended wilderness areas preserve opportunities for inclusion in the National Wilderness Preservation System. The Forest maintains and protects the ecological and social characteristics that provide the basis for wilderness recommendation." (pg 89);

*"Focused recreation areas provide sustainable recreational opportunities and settings that respond to increasing recreation demand. Local communities can readily access these areas for a variety of motorized and non motorized experiences." (pg 110) and;

*"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." (pg 149).

The word "sustainable" is a common theme throughout these statements, but we are unclear as to how the USFS plans to manage recreation sustainability. Is there a management plan in place for the Holland Lake focused recreation area and the Swan Front recommended wilderness area? How will increased recreation impact the Swan Front wilderness character and other wilderness eligibility criteria? How will HLL MDP impact the quality of visitor experiences? How will the increase in guest capacity impact dispersed recreation throughout the valley? How is the HLL MDP responsive to changing conditions due to system stressors such as climate change? How will tripling users on the trails in the Holland Lake and surrounding areas impact user conflict?

We have become very concerned about the increasing trends of recreation and associated negative impacts in the Swan Valley. Given our abundance of public lands within the watershed, we feel that this increasing trend in recreation will only continue and that we, along with the U.S. Forest Service (USFS) and other partners need to help guide responsible, sustainable use of this rare, incredible, wild landscape to ensure it remains this way for future generations. SVC partners with the USFS to run the Visitor Center at the Condon Work Center, as well as funding and hiring backcountry Trails Stewards who help maintain trails and campsites in the front country and Wilderness, while providing visitor services education. Thus, we are deeply connected to the Swan Valley watershed and community, and see and hear from our staff, contractors, and recreational visitors about the quality of their experiences.

During the increase of recreational use throughout the Swan watershed, we have seen and heard common trends that include: trailheads and campsites (developed and undeveloped) that have exceeded carrying capacity, dispersed camping and associated impacts in areas that aren't usually utilized, a backlog of maintenance to the recreation infrastructure, and an abundance of litter and unburied human waste. Given the explosion of recreation, the associated impacts from that use, and the backlog of maintenance and limited personnel and funding to properly manage these impacts, SVC does not feel that it is a responsible decision to increase recreational use and impacts across the landscape by tripling the capacity of HLL, or by expanding the current Holland Trailhead parking lot size.

The response to increased demand is not simply to build more, but instead to create thoughtful management plans that are collaboratively written and contain standards and indicators for monitoring. There are some building improvements we can support, such as a larger pit toilet at the trailhead, or a modest increase in accommodations and the restaurant, as we recognize that there are critical infrastructure improvements to be made. We cannot support enlarging the existing trailhead parking lot, as again this begs the question of sustainability, but instead we would like to understand more about the quality of visitor experiences and how resources are being impacted.

We respect the plan's intent to offer a variety of experiences rather than an exclusive business model, and we do hope to see a sustainable business thrive at Holland Lake. We would like to see the USFS hold the special use permit holder accountable towards achieving the forest plan desired outcome of, "access to the Forest's recreation settings and opportunities facilitates participation by diverse populations, and helps foster a sense of place and stewardship advocacy." (pg 60). We would also like to see the revenue generated from this special use permit to translate into increased funding for recreational management, trail maintenance, bear managers, and law enforcement on the Swan Lake Ranger District.

In summary, we request that the USFS complete a thorough and thoughtful analysis of cumulative impacts increased recreation and infrastructure in the HLL MDP will have on Holland Lake and surrounding National Forest lands. We request that the USFS complete management plans for recreation on the forest, and in the Holland Lake area, as well as for the recommended wilderness.

While we feel that the proposed increase is too large and more analysis is needed, we appreciate the effort of POWDR's staff that has been put into this proposal, and there are elements of the HLL MDP we can support, including:

- ?Employee housing
- ?Increased visitor services and educational opportunities
- ?Bear resistant waste management
- ?Recycling
- ?Forest management prioritizing forest health and fuels reduction
- ?Clustered building development
- ?Non-motorized water recreation
- ?Dark sky friendly initiatives

?Water and energy conservation

?Zero use of pesticides and fertilizer

We also appreciate the opportunity to give guidance to this project as members of the public, and recognize that private businesses on private property would not give us that opportunity.

The USFS needs to be more proactive in their communications and relationships with their partners and the public. We invite the USFS to collaboratively work with local partners and vested interests to help craft proposals before they are finalized for public dissemination, which might be more palatable to the local community and avoid unnecessary public backlash that stems from poor USFS public involvement and outreach. We invite the USFS to proactively discuss recreation and collect information in an ongoing, collaborative process in order to have science-based decision making tools into the future, as the human population continues to grow and recreate in this sensitive, special environment. The Swan Valley flanks the western portion of the Crown of the Continent Ecosystem, which is known as one of the last remaining wild and intact landscapes in North America. It is one of the few remaining places on earth that still harbors its full complement of native fish and wildlife species in their natural habitats. There aren't many places like this left in the world, and that is why careful analysis of potential impacts of increased development and recreation is imperative.

Thank you for your consideration,

Swan Valley Connections Staff & Board of Directors