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Title: President

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Dear USFS Holland Lake Review Board,

Thank you for the opportunity to comment on the proposed resort development at Holland Lake. The Montana Loon Society (MLS) has significant concerns about this proposal and its potential impact on the nesting success of a pair of common loons whose nest is about one-half mile from the proposed Bridal Suite cabin. Holland Lake was in the study area of my Master's Thesis that examined the effects of human recreational activities on the productivity of common loons at Montana State University between 1986-1992. There were no territorial or nesting loons on Holland Lake from 1986 to about 2003 when I personally surveyed this lake for this bird. Occasionally a single bird was sighted fishing during this period. In 2019, loons successfully nested for the first time since loons stopped nesting on Holland Lake in the distant past. This initial loss was probably due to increasing human recreational activities (fishing, boating) coupled with the original development of lakeshore cabins and a drivable highway which gave people easier access to this lake. The Holland Lake pair have nested each year since 2019, successfully raising chicks three of those four years.

Montana has the highest number of common loons west of the Mississippi with about 200 birds in our breeding population. Most of the 70 pairs of nesting loons are found north of Missoula and west of the continental divide. These birds live 20-30 years and age of first breeding is 7 years (range is 4-10). They generally lay 2 eggs and both parents incubate for 29 days. Loons are adapted for swift underwater maneuvering that enables them to out-swim their fish prey. But these aquatic adaptations cause them to be very ungainly on land and very sensitive to any perceived threat in the area of the nest. Loons select a nest site that is immediately adjacent to water which allows them to quickly exit the nest if any kind of threat (watercraft) comes within about 100 yards of the nest. The eggs are incubated by their large feet located at the rear of the birds. If a kayak or canoe comes into view closer than 100 yards to the nest, the loon may launch itself off the nest and, in the process, the two eggs can be ejected from the nest. Because of the loons' specialized adaptations and relatively low numbers, it has been designated a "species of concern" nationally and a "sensitive species" in Montana.

The Montana Loon Society is opposed to the proposed resort development on Holland Lake for the following reasons:

1) Holland Lake is already an extremely popular recreational destination from the moment of ice-off (when the loons show up) in the spring to when snow and ice close down the campgrounds and boat ramps in December. This proposed resort will cause even larger numbers of people to come to Holland Lake. This, of course, is the whole point and idea for a new, larger resort. But it is exactly what nesting loons on Holland do not need.

2) The resort will be renting watercraft to people who normally would have come to Holland Lake without a boat. This further increases the numbers of motorized and non-motorized boats (ski boats and jet skis to kayaks) which, obviously increases the chances of disturbance to either the nest or to the pair and their chicks. I often come to Holland Lake in August, and I have watched as the pair and their 3-month-old chick attempted to use the lake while multiple boats were passing them at high speeds. Loons have been killed by fast-moving boats. In addition, undisturbed loon families, especially with younger chicks will stay in one area for half a day feeding, preening, and sleeping. As human disturbance increases, the family units are forced to swim, sometimes almost constantly, to avoid watercraft which is an unnatural expenditure of energy compared to loons on quieter lakes. The energy needed to grow and develop is used instead on avoidance maneuvers. The end result of this loss of energy to chick survival and fledging (from the lake) is unknown as of this time but concerning to loon managers.

3) The nest site of the loons is directly below and less than 50 feet from an extremely busy trail allowing an easy hike to Holland Falls. MLS and the Common Loon Working Group (CLWG) already had concerns about the near proximity of this trail before the possibility of a resort occurred. A seasonal closure of the trail or the reconstruction of the trail to avoid the nest area may be necessary in the face of much larger numbers of people utilizing the trail from the resort.

4) Loons depend on fish which depend on high water quality. MLS is concerned about how water quality of Holland Lake and its aquifer will be maintained in the face of greatly increased sewage and gray water disposal.

5) While MLS is specifically concerned with the welfare of the loons nesting on Holland Lake, these birds do not exist within a vacuum in the Swan Valley or its ecosystem. Holland Lake Lodge has had the privilege of existing on Forest Service lease lands for decades. Its size and activities have been compatible with the other uses of the Swan Valley and its ecosystem up to this moment in time. The size of the proposed resort and its resulting impacts, in my opinion, will not be compatible with critical grizzly bear habitat or sensitive predators (lynx, wolverine) using this ecosystem.

Because of the concerns mentioned above, the Montana Loon Society is requesting that the Forest Service do an Environmental Assessment on this proposal, following all the requirements of NEPA. We also believe the Forest Service must follow its own Management Plan, and due to grizzly bears in the area, abide by the Endangered Species Act. This current proposal is unacceptable to the Montana Loon Society, and we oppose it in its present form. I am concerned about reports that the resort proposal is a "done deal" even before the comment period has ended. While I am sure this is "fake news", I would remind you that the mandate of the Forest Service is to manage its lands for the citizens who own that land and take note of the huge negative outcry from the citizens of northwest Montana and beyond.

Thank you for your time and consideration of this letter.

Sincerely,

Lynn Kelly

Montana Loon Society President

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