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Comments: K. Gunderson 2nd comments

To: Kurt Steele - Flathead Forest Supervisor, Kurtis.Steele@usda.gov

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I am submitting my second set of comments regarding the Holland Lake Lodge (HLL) expansion.

I will elaborate on issues that focus on the lack of consideration of impacts to fish, wildlife, and water quality on national forest-managed surrounding public lands beyond the small footprint under consideration for a mega-resort and outfitter/guide permits. HLL is located near one of the major gateways into the Bob Marshall Wilderness and the increased footprint of the POWDR mega-expansion will significantly increase impacts to the existing trail system, increase crowding, noise, and displacement of wildlife species. Its location next to the Bob Marshall Wilderness is within a linkage area for grizzly bear recovery and its potential to alter the character and lifestyle of the Swan Valley preclude a categorical exclusion (CE). The level of development proposal at HLL negatively affects future recommendations for Wilderness designation of the Swan Front.

As Chris Servheen states in September 30, 2022 Missoulian editorial,

"Intensive recreation on public lands is a consumptive activity because it destroys wildlife habitat security. It is well documented in the peer-reviewed scientific literature that grizzly bears and elk and other wildlife will usually flee humans on trails and avoid areas where recreating humans are present. Intensive recreation will increase wildlife stress levels and energetic demands as they try to avoid human activity. The proposed expanded development at Holland Lake will have significant negative impacts to thousands of acres of wildlife habitat around Holland Lake that will impact many species including grizzly bears, elk, black bears, lynx, wolverines, furbearers, mule deer and white tail deer and more."

I agree that "The POWDR Corporation proposal completely (intentionally?) ignores off-site impacts of this proposed development. Expanding development at Holland Lake Lodge will result in an additional 35,640 user days per year on public lands in the Holland Lake/Swan Valley area outside the 15-acre lodge site. These additional 35,000+ days will be on public land around Holland Lake, on the Swan Face and in the Swan Valley" (Servheen, 2022). My 1st comments submitted 09.23.22 offer solutions for measuring, monitoring, and evaluating visitor use on trails adjacent to HLL but also should apply to the Swan Front and the Mission Mountains Wilderness.

"The real reason the POWDR Corporation wants to invest in the Holland Lake Lodge 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 Forest Service should reject this proposal as grossly inappropriate for public land in grizzly bear and lynx habitat, for Holland Lake and for the Swan Valley. It is completely contrary to the values we cherish in the Swan" (Servheen, 2022.)

Permitting

POWDR holds no special Use Permit for Holland Lake Lodge. Holland Lake Lodge Outfitters business license expired in 1997 and there is no Agent. Has an outfitter other than Thunderbow Outfitters subsequently been

permitted for Lodge activities and if so, for what activities, seasons or use days? Has POWDR or their Agent proposed outfitted use in a separate Outfitter/Guide application?

In addition, the first Mission Mountains Wilderness (MMW) management plan states, the following regarding commercial outfitting/guiding operations:

\*Do not issue new special-use permits for commercial outfitter operations until it is determined that additional or new services are needed.

\*Do not increase the allowances under the present permit to Vernon Cheff. The present permit may be transferred/or reissued only to Vernon Cheff's son(s).

\*Intensify effort to prosecute people operating commercially without permits from the Forest Service or the State of Montana Department of Fish & Game (USDA, Forest Service, 1978, p. 29)

If POWDR requests approval of outfitter services there should be NO additional special-use permits for commercial outfitting/guiding operations on the Swan Front or Mission Mountains Wilderness.

My initial comments, 09.23.22 state: "If outfitter/guide services are requested by POWDR there should be no special considerations to award these permits to Swan Mountain Outfitters (SMO) given their sordid history of operations on both state and federal lands and the bad reputation they have in the Swan Valley." SMO has illegally outfitted and guided on state forest lands, built non-system trails in Piper Creek, Mission Mountains Wilderness, breached contract obligations for contracted guiding/outfitting at Piper Lake, left piles of manure filled with baling twine and garbage adjacent to their outfitter camp near Lion Creek Road, and illegally used chainsaws in the Palisades Lake area on the Swan Front within the Bob Marshall Wilderness. SMO should not be considered for an outfitter expansion out of HLL that will result in a monopoly of outfitter guide services on the Swan Front from Bond Creek in Lake County to the FNF-managed lands in Missoula County.

If POWDR, which has numerous ski areas around the county as well as a helicopter skiing company, gets their foot in the door, in 10-years will they request a heli-pad on the 15-acre parcel of public land and for what purposes? Or is that planning already underway along with the Flathead National Forest? How will that be analyzed? Another CE? A CE is used for small projects with no environmental impact, but the HLL expansion proposal far exceeds the scope and limitations allowed.

Key concerns include:

1. The proposed expansion does not comply with the NCDE Conservation Strategy
2. The Project affects far exceed its 15-acre footprint ... or is it 19 acres, or 11 acres, or 10.53 acres?
3. Inadequate public notification resulting in a breach of trust from local community members who live and/or recreate in the Swan Valley.
4. The use of a categorical exclusion is inappropriate. See my 09/23/22 comments.
5. The Flathead National Forest, in particular the Swan Lake Ranger District, lacks a needs assessment and recreation strategy.

In closing, the HLL expansion proposal of this magnitude should receive a full EIS. POWDR should not be granted the proposed development without a full EIS and full range of alternatives for where that developed in the affected Bear Management Unit (BMU) should occur or whether it should occur at all. It should not come down to "reducing paperwork, time and resources" (Steele, 2022).

Aldo Leopold worked as a wildlife biologist for the Forest Service. In his widely acclaimed book "A Sand County Almanac," Leopold defined what a land ethic is, "A land ethic expands the definition of "community" to include not only humans, but all of the other parts of the Earth, as well: soils, waters, plants, and animals, or what Leopold called "the land." The Flathead National Forest should embrace Leopold's wisdom and deny this project proposal. We DO know what is best for our community and the lifestyle choices we make to live here. We do not

want to see Condon/Swan Valley turn into a Moab, Utah or Yellowstone Club at Big Sky, or Teton County, Wyoming (Farrell, 2020).

Please keep me advised of any opportunities for further comment on any projects at Holland Lake and enter me in your automatic contact data base for any decisions on this or related projects at the Holland Lake Lodge.

Thank you for your consideration.

Sincerely,  
Kari Gunderson, PhD  
Wildland Recreation Management

#### References

Farrell, Justin. (2020). *Billionaire Wilderness: The Ultra-Wealthy and the Remaking of the American West*. Princeton University Press.

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Missouliau. (2022). Huckleberry pie for the class of 2027. *Missouliau Editorial* September 30, 2022, p. A6

Servheen, Chris. 2022. Corporate recreation comes to Holland Lake. *Seeley Swan Pathfinder*.  
USDA Forest Service. (1978). *Mission Mountains Wilderness Plan*, p. 29.

CC via mail:  
Senator Jon Tester