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First name: Mike

Last name: Anderson

Organization: The Wilderness Society

Title: Senior Policy Analyst

Comments: The Wilderness Society appreciates the opportunity to submit comments on the proposed Holland Lake Lodge Facility Improvement & Expansion Project (HLL) and to engage in both the September 8th open house as well as the October 4th meetings in the communities of Condon and Seeley Lake. We have serious concerns about the HLL proposal described in the scoping notice dated September 1, 2022. We are concerned that the proposal to greatly increase the number and size of lodge facilities and make them usable during the wintertime would significantly and irreversibly damage the environmental and cultural values of this special place, which serves as a gateway to the Bob Marshall Wilderness.

We also disagree with the proposed use of a categorical exclusion (CE) for this project to short-cut the environmental analysis and public involvement process required by the National Environmental Policy Act (NEPA). We do not believe that the Forest Service's CE for improvements to existing recreation sites at 36 CFR 220.6(e)(22) can reasonably be applied to this major expansion proposal. As indicated by the Forest Service NEPA regulations, the recreation sites CE is intended to be used only for small-scale expansion activities such as "expanding a recreation rental cabin" - not for building 26 new rental cabins, a new 13,000-square foot lodge, and a 3,000-square foot restaurant.

Furthermore, use of a CE for this project is likely precluded by the presence of "extraordinary circumstances" that would result in significant environmental effects. Specifically, the lodge expansion project would occur in known grizzly bear habitat, a species listed as threatened and protected under the Endangered Species Act (ESA). The Flathead National Forest is part of the Northern Continental Divide Ecosystem (NCDE) and grizzly bear recovery zone, home to one of the largest populations and highest densities of grizzlies in the lower 48 with more than 1,000 individuals. The Swan Valley, including Holland Lake, links the Bob Marshall Wilderness Complex and the Mission Mountains Wilderness and is an important connectivity zone for grizzly bears. Forest Service NEPA regulations condition the use of CEs on the absence of extraordinary circumstances and identify "[f]ederally listed threatened or endangered species" as a resource condition requiring consideration of potential extraordinary circumstances under NEPA (36 CFR 220.6(b)(1)(i)).

The proposed expansion of infrastructure, capacity, and seasonal operations on the HLL site could detrimentally and irreversibly impact numerous important wildlife species - in addition to grizzly bears -- that rely on the surrounding wilderness landscape. The Flathead National Forest contains critical habitat for Canada lynx, a species listed as threatened under the ESA. The Crown of the Continent, including the Holland Lake area, also supports one of the largest wolverine populations in the lower 48 states. Currently classified as a candidate for ESA listing, wolverines rely heavily on remote and connected habitat. Both Canada lynx and wolverines depend on undisturbed wild lands for maternal denning throughout the winter and spring. Lands adjacent to Holland Lake also provide important winter range for elk and deer, which subsequently serve as a food source for carnivores in the area. In addition, Holland Lake is one of only three lakes in the Swan River watershed that hosts an active loon nesting site. Human disturbance, both motorized and non-motorized, is the leading known cause of loon nest abandonment.

Furthermore, both Holland Creek and Holland Lake provide critical habitat and spawning grounds for threatened bull trout, and Holland is designated a conservation watershed under the 2018 Flathead National Forest Plan. Based on the data in Issak et al.'s Climate Shield Cold-Water Refuge Streams for Native Trout (housed in the USFS Data Archive), upper Holland Creek from its source to Upper Holland Lake is also predicted to serve as a cold-water refuge for temperature-sensitive species of native trout, specifically westslope cutthroat trout, in the face of climate change. Upper Holland Lake and upper Holland Creek are both popular destinations for visitors to Holland Lake, yet the HLL proposal does not mention the need to mitigate increased recreation and its

associated impacts to highly sensitive fish species in the watershed.

Indeed, the Swan Valley is home to some of the most pristine headwaters in the Columbia River Basin, serving as critical habitat for an array of aquatic species and providing drinking water for hundreds of thousands of people downstream. Thus, water quality is of utmost importance when considering new development and an increase in water-based and water-adjacent recreation.

If the Forest Service chooses to continue consideration of this controversial proposal, we believe that it needs to be analyzed in an environmental impact statement (EIS). Significant growth in recreational use because of an increase in overnight visitors, along with extending recreational use into the winter months, must be evaluated with an eye towards cumulative effects of this development on the lake, the trail use in and out of the Bob Marshall Wilderness from the increased number of people, and the potential increase in mountain biking, traffic, garbage, noise and attractants. All of the potential impacts of these increases in recreation use need to be evaluated and disclosed to the public, through a robust cumulative effects analysis that also looks at potential future growth in the area.

The unique character of this landscape necessitates a cautious and thoughtful approach to its management, which is something not currently reflected in the HLL proposal. The EIS needs to explore the numerous and complex impacts of the HLL proposal, and to provide clear, science-based directives for education, monitoring, planning, stewardship, and overall management of the area. These directives should include specific considerations for mitigating the effects of habitat fragmentation, wildlife-human conflicts, wildlife-vehicle collisions, denning and nesting site disturbance, and impacts to fish while contributing to species recovery and the integrity of places that may serve as climate refugia. The EIS also needs to consider the impacts of development and increased visitation and recreation on the water quality of the Holland drainage and connected watersheds. The EIS should provide science-based directives for the mitigation of aquatic invasive species, water quality monitoring, sewage and wastewater management, and planning for the long-term effects of climate change and increased recreation within the watershed.

The HLL proposal would triple the overnight guest capacity of HLL yet does not provide an estimation of increased tourism in the Swan Valley due to the HLL's expanded seasonal operation, restaurant capacity, gear rentals, and other amenities. The proposal uses the word "sustainable" to describe its development goals with regards to design but fails to provide a plan for sustainable growth and management of dispersed tourism and recreation directly related to the HLL expansion. Specifically, the proposal does not include language that addresses the character of and potential impacts to the Swan Front Recommended Wilderness Area, which is home to some of the most popular recreational destinations near Holland Lake. While improving the toilet facilities at the Holland Lake Trailhead is an admirable component of the proposal, increasing the size and capacity of the trailhead without an accompanying plan for managing use and user conflict is a notable oversight. The proposal also makes no mention of the potential strain on local Search and Rescue (SAR) resources with increased recreation, nor does it provide a plan to help support this community resource. Prior to approving any plans for development, we encourage the Forest Service to utilize available data, consult with the local community, and conduct a thorough EIS with the goal of monitoring impacts to natural resources, determining the carrying capacity of Holland Lake and the surrounding trails, establishing a plan to support local SAR resources, and collaboratively shaping a sustainable tourism and recreation management plan.

Trust and transparency are common values among many rural communities, but the HLL proposal does not reflect significant consideration of the local community. While a HLL Master Development Plan was submitted on April 15th, 2022, no public outreach was conducted over the summer or, perhaps more importantly, during the development of the proposal itself. To the contrary, a mere 8-day notice was given prior to the first open house in early September, negating any consideration of travel restrictions, childcare needs, bow hunting plans, and other barriers that might make it difficult for community members to attend on such short notice. This lack of

consideration is punctuated by remarks made in the most recent community meeting on October 4th which admitted that the Forest Service had misrepresented the footprint of the HLL site and proposed expansion. Though the Forest Service decision-making process is underway, it is not too late for meaningful community outreach in the interest of re-imagining a proposal that centers trust and transparency, sustainable economic development, and genuine collaboration.

One of the most serious shortcomings of the HLL proposal is its failure to acknowledge the history, culture, and values of the Salish, Kootenai, and Pend d'Oreilles People upon whose traditional homelands the HLL site is located. Nowhere does the proposal recognize the extensive history of Indigenous land use and stewardship within the Swan Valley, nor does it mention the Hellgate Treaty of 1855 which identifies the Confederated Tribes' right to hunt, fish, and gather throughout their aboriginal territory. To our knowledge, the Forest Service made little if any effort to conduct meaningful and respectful consultation with the Tribes prior to the release of the Master Development Plan this spring. Moving forward, we encourage the agency to invest the time and energy necessary to build trust and accountability with the Tribes, to develop processes that ensure genuine representation of Indigenous values, and to pursue avenues for collaborative and equitable management of the HLL site and surrounding area into the future.

Finally, we encourage the Forest Service to respond to the larger concerns outlined here (e.g., the need for cumulative effects analyses for threatened and endangered species) through more proactive, comprehensive multijurisdictional recreation planning. Land management agencies should be working together in a coordinated manner to guide recreation, visitation, and recreational development within the Crown of the Continent landscape, instead of responding independently to outside development proposals that could greatly harm Crown resources. Engaging with existing Crown-wide management coalitions, such as the Crown Managers Partnership, could be of great value in supporting this outcome.

Thank you for considering The Wilderness Society's comments. If you have any questions about or responses to our comments, please contact Anne Carlson at anne_carlson@tws.org.

Sincerely,

Anne Carlson
Director, Crown of the Continent Landscape
The Wilderness Society

Mike Anderson
Senior Policy Analyst
The Wilderness Society

Jennifer Ferenstein
Montana Senior Manager
The Wilderness Society

Jessy Stevenson
Crown Community Conservation Specialist
The Wilderness Society