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Comments:

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RE: Holland Lake Lodge Facility Improvement & Expansion Project

To Whom it May Concern,

*Note: These comments are my own and do not represent the thoughts or opinions of the organization for which I work, the organizations for which I serve as a board member, nor any collaborative groups with which I engage.

I appreciate the opportunity to submit comments on the proposed Holland Lake Lodge Facility Improvement & Expansion Project 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.

As a member of the public, a resident of Montana who was born and raised in the Swan Valley, and someone whose life and work have been shaped by the landscapes and communities of the Crown of the Continent, I am deeply concerned with the scope of this project as outlined in POWDR's Master Development Plan (MDP). My concerns include:

The MDP fails to acknowledge the history, culture, and values of the Salish, Kootenai, and Pend d'Oreilles People upon whose traditional homelands the Holland Lake Lodge (HLL) site is located. Nowhere does the MDP 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. I am thoroughly unimpressed with the lack of effort put forth by both POWDR and the United States Forest Service (USFS) to conduct meaningful and respectful consultation with the Tribes prior to the release of the MDP. Moving forward, I encourage both POWDR and the USFS 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 Holland Lake Lodge site and surrounding area into the future.

Equitable access to nature is not prioritized within the current MDP. The 2018 Flathead National Forest Management Plan includes a stated desire that, "access to the Forest's recreation settings and opportunities facilitates participation by diverse populations, and helps foster a sense of place and stewardship advocacy" (p. 60). It's no secret that public lands across the nation have been disproportionately accessed and enjoyed by affluent, white, able-bodied, English-speaking, and otherwise privileged populations throughout history. Furthermore, disadvantaged communities and minorities have been and remain chronically underrepresented in public land management processes, which serves to perpetuate the barriers to access and use experienced by those populations. According to POWDR representatives, the average cost of lodging under the MDP falls within the range of \$450/night. With a local median household income of around \$50,200/year and over 23% of the population living below the poverty line, the proposed price tag suggests that the amenities within the MDP would be largely inaccessible to local community members and would instead serve the demographics who already inordinately benefit from our public lands. Seeing as the Holland Lake Lodge site is operated under a special use permit within the Flathead National Forest, it seems within reason that the special use permit holder would be required to contribute to achieving the same desired outcomes as those stated in Forest Management Plan,

including the prioritization of equitable access to nature for diverse populations. I hope to see these values represented more thoroughly as the USFS considers this proposal.

Habitat connectivity and viability of local wildlife species would likely be impacted under the current MDP. The Swan Valley is located at the heart of the Crown of the Continent Ecosystem, home to some of the most critical habitat and intact wild lands on the continent. Expansion of the HLL site paired with a lack of sustainable, long-term management planning under the proposed MDP are likely to impact the following:

Grizzly bears

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. It is for this reason (and the fact that extensive research on grizzly bear populations in the area exists) that I am disheartened at the lack of research and factual evidence supporting POWDR's claim that grizzlies have not been sighted at or near Holland Lake Lodge within the last 17 years. Even without documented sightings, widely available science posits that Holland Lake Lodge, and the surrounding area are located within known grizzly bear habitat. As the largest land manager within the NCDE, the USFS is responsible for management practices that contribute to the recovery of grizzlies in the ecosystem. Any proposal for development on federal lands within the NCDE should include a plan for sustained recovery of the species.

Human-bear conflict

In the days prior to the September 8th open house, there were numerous accounts of a habituated black bear breaking into vehicles and one home within the vicinity of Holland Lake. Though extremely unfortunate, this situation is not uncommon among both public and private lands in Montana given the robust increase in visitation, use, and property sales within the wildland urban interface (WUI). I am encouraged by the HDP's inclusion of bear-resistant waste management, on-site bear-spray sale and rental, and public education around, however I am concerned that those efforts will quickly be overshadowed by a significant increase in visitation and recreation, leading to heightened human-bear conflict with both grizzlies and black bears.

Canada lynx

The Flathead National Forest is part of the US Fish and Wildlife Service's (USFWS's) Northern Rocky Mountains region (unit 3) and is considered critical habitat for Canada lynx, a species listed as Threatened under the Environmental Species Act (ESA). Canada lynx mating season occurs from February to April with kittens born 8 to 10 weeks later. While these dates exist outside of the suggested operation season for the HLL, the MDP fails to include any assurance that Canada lynx mating and denning would be managed for and protected should the winter/spring recreation season be expanded in the future.

Wolverine

The Crown of the Continent, including the Holland Lake area, is home to one of the largest wolverine populations in the lower 48 states. Though not currently listed as a species of concern under the ESA, wolverines rely heavily on remote and connected habitat. Wolverine mating occurs between May and August while denning season is February through May. The MDP fails to include measurements for the management of increased summer and winter recreation with regards to wolverine habitat, mating, and denning within the Swan Valley.

Big game species and wildlife-vehicle collisions

Lands adjacent to Holland Lake provide important winter range for elk and deer, which subsequently serve as a food source for carnivores in the area. Wildlife-vehicle collisions are already a point of concern for residents of the Swan Valley and anyone travelling through the area on MT Highway 83. Heightened winter recreation in the area may not only degrade the value of winter range habitat but may also lead to increased wildlife-vehicle collisions as the result of human disturbance and the resulting movement of big game species.

Loon nesting sites

Human disturbance, both motorized and non-motorized, is the leading known cause of loon nest abandonment. While the MDP recognizes the presence of this vulnerable species and the importance of protecting active nesting sites, it does not specify how increased recreation on and around the lake will be managed to ensure its protection, not to mention the protection of fish and other aquatic species that the loon's diet is comprised of.

Bull trout

Holland is designated a conservation watershed under the 2018 Flathead National Forest Plan as both Holland Creek and Holland Lake provide critical habitat and spawning grounds for bull trout. The MDP does not acknowledge this sensitive species, nor does it outline a management plan to mitigate the impacts of increased recreation and angling.

Climate refugia

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 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 MDP does not outline a plan for managing increased recreation and its associated impacts to highly sensitive fish species in the watershed.

The proposed expansion of infrastructure, capacity, and seasonal operations on the HLL site could detrimentally and irreversibly impact each of the species and situations detailed above. The unique character of this landscape necessitates a unique and thoughtful approach to its management, which is something not currently reflected in the MDP. I encourage the USFS to conduct a thorough environmental impact statement (EIS) to explore the vast and complex impacts of POWDR's proposed expansion, 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.

Water quality could be threatened by insufficient shoreline setbacks and increased water-based recreation. The Swan Valley is home to some of the most pristine headwaters in the Columbia River Watershed, 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. Potential impacts include:

Aquatic Invasive Species (AIS)

As a tributary to one of only a few watersheds in the lower 48 states that remain free of zebra mussels, it is critical that recreation in the Holland drainage be managed to prevent the establishment of this and other aquatic invasive species. The proximity of HLL facilities to the Lake, the likelihood of guests bringing personal watercraft, and an overall increase in recreation warrants a more robust plan for the management of and public education around AIS. Already, the USFS and partners have been working to combat an infestation of fragrant water lily in Holland Lake - efforts which should be upheld and enhanced in any plans for expansion and development.

Water quality and erosion

The MDP proposes a 20-foot shoreline protection zone in which no new buildings or improvements are planned. The MDP does not, however, expound upon the protections that this seemingly insufficient barrier will afford in terms of motorized and non-motorized watercraft use, swimming, shoreline access, and other activities that could contribute to erosion and water quality degradation.

Sewage and wastewater management

While the MDP asserts that the HLL's current wastewater system is considered sufficient with minor improvements, it does not propose a plan for sewage and wastewater management in the face of a changing climate and growing population. As outlined in the MDP, the special use permit holder will be responsible for the operation of the HLL Wastewater Lagoon and should, therefore, be tasked with proactively planning and mitigating for the potential of septic overloading, wastewater lagoon breach, and other circumstances which could significantly impact water quality.

As one of the most vital resources for human communities and wild ecosystems alike, it is imperative that water and water quality are approached with extreme care. In step with my concerns around habitat and species, I urge the US Forest Service to conduct a thorough Environmental Impact Statement (EIS) with specific considerations for the impacts of development and increased visitation and recreation on the water quality of the larger watershed. This EIS should provide science-based directives for the mitigation of AIS, water quality monitoring, sewage and wastewater management, and planning for the long-term effects of climate change and increased recreation.

The surrounding public lands and community could be significantly impacted by escalated use and visitation to the Swan Valley. The HDP proposes to triple the overnight guest capacity of Holland Lake Lodge 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 recreation 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 proposal to help support this community resource. Prior to approving any plans for development, I encourage the US 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.

The process thus far has failed to involve thoughtful outreach to, inclusion of, and collaboration with the local community. Trust and transparency are common values among many rural communities. While the US Forest Service and POWDR have acted within the bounds of what is legally required of them, they have not acted with significant consideration of the local community. While the MDP 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 US Forest Service had misrepresented the footprint of the HLL site and proposed expansion. Though the process is underway, it is not too late for the US Forest Service and POWDR to conduct meaningful community outreach in the interest of re-imagining a proposal that centers trust and transparency, sustainable economic development, and genuine collaboration.

The use of a categorical exclusion (CE) for this project would be an abuse of the USFS's authority to use this tool and would sidestep the basis of the National Environmental Policy Act (NEPA) review process which is intended

to assess the potential environmental impacts of proposed actions. A project of this magnitude should, without question, be guided by the best available science, as well as equitable and informed public participation. In closing, I urge the USFS to conduct a thorough EIS with an eye towards habitat fragmentation, sensitive species, human-wildlife conflict, water quality, and climate refugia. I also encourage the USFS and POWDR to review the desired outcomes of the 2018 Flathead National Forest Management Plan as it relates to participation by diverse populations, and to develop a management plan in consultation with the Confederated Salish and Kootenai Tribes that supports equitable access to wild lands, recreation, and all existing and future HLL amenities. Finally, I implore both the USFS and POWDR to move forward with keen consideration and respect for the input, concerns, and thoughtful participation of the local community.

I look forward to participating as this project evolves.

Thank you for your consideration,

Jessy Stevenson