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Comments: I am writing to voice my objections to the proposed expansion of the Holland Lake Lodge as currently proposed by the Flathead National Forest, POWDR and Holland Lake Lodge, Inc. Several of my concerns are related to the 3 W's that will be irreparably harmed by this development; wildlife, water quality, and waste water treatment. Holland Lake is situated in the middle of the Swan Valley grizzly bear linkage zone; grizzly bears traverse between the Swan and Mission Ranges in and around the Holland Lake area. The Forest Service is well aware of the bear's presence at Holland Lake. The Forest Service has installed bear proof garbage cans and bear proof food storage lockers at Holland Lake, Lindberg Lake and numerous dispersed campsites around the Swan Valley. Recently an outfitter heading out from the Owl Packer Camp trailhead had a pack animal die on the trail. The Forest Service posted warning signs around the trailhead and distributed flyers to area residents warning of the dangers, and then disposed of the carcass with dynamite in an effort to avoid any grizzly bear conflicts. Summer home residences on the southside of Holland Lake have been visited by grizzly bears on countless occasions. The Gordon Ranch on Holland Lake Road has had numerous, and some rather legendary, grizzly bear encounters for decades. The master plan submitted by the developer makes the ridiculous statement that to their knowledge there have not been any sightings of grizzly bears on Holland Lake Lodge property or anywhere on the lake for the last 17 years. In addition to the presence of the grizzly bear, Holland Lake, and by extension, Holland Creek, are bull trout waters. A full NEPA review of protentional impacts to threatened and endangered wildlife species is required.

The proposed expansion of the Holland Lake Lodge will also negatively affect the pristine water quality at Holland Lake. The plans include new and greatly expanded grass lawns and expanded access points to the shoreline. The grass lawns will introduce fertilizers and herbicides to the lake. The increased access points will increase fine-grained sediments into the lake. Both of these non-point pollution sources need to be documented and evaluated by an EIS where bull trout waters are involved.

The proposed plan calls for an expansion of the existing solid waste treatment facility at Holland Lake and notes that the continued operation and maintenance of this expanded facility would be turned over to the developers. The potential for abuse or neglect of such a basic human health and sanitation service by a for-profit corporation is completely unacceptable.

Finally, I would like to address the biggest concern this proposed development raises. The proposed plan conveniently ignores and strolls right past the historic values that are present at Holland Lake. I have been working professionally with the National Historic Preservation Act and the National Register of Historic Places in Montana for over 35 years. The Holland Lake Lodge is a National Register of Historic Places eligible property. The proposed expansion will constitute an adverse effect to a National Register property as specified in the National Historic Preservation Act. A convincing argument can be constructed for a Holland Lake Historic District based on the historic landscape and the historic properties that encircle the lake. The Lodge, the Forest Service campgrounds, the public beach and boat ramp, the summer home residences on the south shore, the Owl Packer Camp, and the Forest Service trails that lead into the Bob Marshall Wilderness area tell a compelling story of early recreation in the Swan Valley that is based on the solitude and scenic qualities found in the landscape. There are historic remains of a lookout station on the peak above Holland Lake and remains of the historic Holland Guard Station on the west shore of the lake that tell the story of early days of the Forest Service in the Swan Valley. The Forest Service was aware of the visual qualities of Holland Lake as early as the mid-1940s when the agency plotted lots for summer home residence. These lots were intentionally set back from the lake to prevent and reduce any visual intrusion into the landscape. The Forest Service has been actively managing and preserving the landscape at Holland Lake for nearly 100 years. The proposed expansion will constitute an adverse effect to the spectacular Holland Lake historic landscape.

The proposed plan will also unnecessarily compromise historic structures at the Holland Lake Lodge. There is no need to remove the current gift shop, the log structure behind the Lodge is actually the oldest building at the Lodge and it dates to the establishment of the resort in the 1920s. This historic gem can and should be preserved. The plans call for removal of all of the existing cabins which is also unnecessary and constitutes an adverse effect to a historic property. The proposed dining facility adjacent to the Lodge would also be an affront to a historic property. The plans also include measures to take photographs of the historic buildings that will be removed and then placing these photographs in the new buildings. This is not historic preservation; it is an unacceptable slap in the face to historic preservation.

Conversations with Forest Service personnel at the Lodge for the recent public meeting included the possibility of off-site mitigation measures for the adverse effects created by this proposal. This idea is astounding and completely unacceptable. The mitigation measures must be developed on-site and they must address the palpable history of Holland Lake. These measures must present ways to reduce or avoid harming the historic fabric of the Lodge and Holland Lake historic landscape. The development, especially the new lodge, can be pulled back from the lakeshore to reduce the intrusion to the landscape, there is plenty of available space near the historic barn and pasture. The historic gift shop log building is such a gem, it needs to be preserved and put to new use. Several of the historic cabins need to be preserved and re-used. As a last resort, interpretive signs can tell the story of the historic guest cabins that were removed. Reducing the scale and mass of the new proposed dining facility would lessen the adverse effect to the Lodge. Moving the new dining facility to a different location away from the lake would also reduce the adverse effects to the Lodge and landscape. The new development needs to avoid introducing any new architectural details or elements that would be incompatible with the Lodge. It is imperative that a full set of mitigation measures, large and small, are developed and implemented on-site.

In summary, the historic values at the Holland Lake Lodge and Holland Lake need to be brought to the forefront of the planning process. The lodge, the historic properties in and around the lake and the historic landscape of Holland Lake tell a persuasive story that is inextricably tied to the sense of place that so many Montanans hold dearly. These historic values need to be at the forefront of the planning process and not presented as an unfortunate afterthought.

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