

Data Submitted (UTC 11): 9/30/2022 11:17:21 PM

First name: Jean

Last name: Curtiss

Organization:

Title:

Comments: Comments to USFS- Swan Lake Ranger District

Holland Lake Lodge Special Use Permit

From Jean Curtiss, raised in Swan Valley, Landowner in Swan Valley, Former Missoula County Commissioner

I am writing in opposition to the proposed application for a special use permit for the Holland Lake Lodge by POWDR. This application needs a lot more review. Holland Lake is in the Crown of Continent.

The USFS website states 'We work for nature because we believe in Caring the Land and Serving the People. The people are the public who own this land not just the applicant. Your decisions should be for the 'good of the whole'. The proposed project requires a lot more vetting to show that it protects the land and serves the people. Any special use permit issued must be consistent with standards and principles of the land management plan for the area. A commercial use, like the one proposed, must include an annual operating plan showing the operations authorized by the permit will protect public health and safety, protect the environment and be sufficient in detail and standards to enable the FS to monitor the holder's operations.

I assume a new permit will be held to at least the same standards as the current special use permit. I was not able to find the amendment that changed the permit area from 10.53 acres (2017 permit) to the 15 acres referred to in this application. I will point out areas of concern using the current permit as the basis.

III. Operations E. Condition of operations- holder shall maintain the authorized improvements and permit area to standards of repair, orderliness, neatness, sanitation and safety. The current owner has stated that all the facilities need upgrading- wasn't that his responsibility under the permit? D. Equal Access- holder agrees to ensure that its programs are open to the general public on equal basis. These plans cater to an exclusive, wealthy clientele. It is clear the average citizen will be excluded. The wealthy have plenty of places to play. Another section of the permit refers to Interference of public use. Holland Lake is the one lake in the upper Swan Valley that is family friendly. There is a designated swimming area, room to kayak, canoe or paddleboard, and it is easy to get to the water. Lindbergh Lake for example has about 3 feet of silt at the boat launch area and no good place to swim. This is the local go-to spot.

IV. Rights and Liabilities- A. this is not a contract or a lease but a federal license. H. Enviro Protection - 2. Avoid damage and contamination of soil, vegetation, surface water and ground water. 3. Cannot cause or threaten to cause harm to vegetation, timber, fish, wildlife and habitat. V Resource Protection. A. Compliance with Environmental Laws, B. Water Pollution that harms fish, wildlife or human water supplies, C. Protect scenic esthetic values of permit area and adjacent lands. This project increases the number of guests beds threefold and the number of user days. I served on the Missoula City County Board of Health for 18 years and as District Manager for the Seeley Lake Sewer District for over 2 years. This project will need a lot of environmental review to prove the carrying capacity of the land can handle this increase in use. The current USFS lagoon will not be adequate. The MT DEQ report included in the materials refers to a reported leak of some tank.

Whether I sit at the swimming area and look at the fall, hike to the falls, kayak on the lake or walk along the shore, Holland Lake is peaceful. The current lodge blends and belongs. The drawings of the proposed project cut so many trees and cram too many buildings on the property. The view from the lake or across the lake will look like any exclusive resort and lose its charm. There will be acres of parking. Now when you do drive into the lodge, the lake is visible between buildings inviting you in. the new proposal will be just parking lots and buildings. Hundreds of trees will be removed. The workforce housing is a glorified dormitory designed for transient workers not employing local families. Proponents talked about improving the trailhead to Holland Falls but it just looks like they made their own spur to connect. Is the trail ready to handle this increased traffic.

For almost a century, the Holland Lake Lodge has been a small, welcoming, rustic, genuine lodge with Montana charm and stunning views on a pristine lake in idyllic seclusion. The current owner uses all those descriptive words in his advertising. This proposal will change all of that in order to make POWDR money. Across the lake from the lodge are USFS cabin lease sites. They all have to protect the lake, the wildlife and the esthetics. They

can't cut trees without permission, etc.

Swan Valley is a small community. My family has lived there for 5 generations. My great Aunt built the original Holland Lake Lodge. The local restaurants, bars and small businesses struggle to find employees. The proposed restaurant, bar and guest quarters will struggle for employees. The guests at this new lodge will have to drive 80 miles for most services.

I do not know if the review officer has to look for ways to generate special use fees for the District. This District is unique as the taxpayers paid for the majority of the Plum Creek Property in the Upper Swan Valley to become USFS land. That means it is our land you are managing. There is very little private land in the valley. The USFS review of this project must weigh the environmental and social impacts as much as the revenue end. POWDR has at least 11 resorts in North America. Most of them are tied to downhill skiing. The nearest downhill skiing to Holland Lake is 2 hours away- Snowbowl in Missoula or Blacktail in Somers or Big Mountain in Whitefish. The FS should have a copy of their business plan. What natural resource is POWDR planning to exploit in the Swan. Cross county skiing, snowshoeing, dogsleds, ice fishing? What about the summer. It will take a lots of paddleboard rentals to pay for millions in investment. Holland Lake is a great gateway to the Bob Marshall Wilderness but there are already outfitters with special use permits. Upper Holland and the west face of the Swan Range are not designated wilderness so will POWDR be applying to drop people by helicopter for extreme skiing. They must have a plan to pay for this project.

The USFS should live up to its motto and protect what makes this area unique- loons, clean water, bull trout, grizzlies, quiet, small, historic solitude, local use, public access, fish, wildlife and habitat. This project does not fit the location. This is not a minor change. It is not low impact. 300% more occupancy. 330% more built area under roof. 2000% more parking. It is not appropriate for a Categorical Exclusion. Please require an EIS.