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First name: Glenn

Last name: Elison

Organization:

Title:

Comments: United States Forest Service

Flathead National Forest

Swan Lake Ranger District

200 Ranger Station Road

Bigfork, MT 59911

Re: Holland Lake Lodge Facility Expansion

To whom it may concern,

I am an active user of the Flathead National Forest and more broadly public lands throughout Montana. I appreciate the opportunity to comment on the proposed Holland Lake Facility Expansion. I ask that you seriously consider these comments concerning the proposed expansion.

Through intensified visitation and recreation, the proposed development and expansion at Holland Lake will have significant negative impacts on wildlife habitat and many species including grizzly bears, lynx, wolverines, furbearers, black bears, deer, and elk in the Swan Valley. These negative impacts to wildlife and wildlife habitat are my fundamental concerns about the proposed project.

The proposed development will more than triple lodging capacity. It will also expand human influence far beyond the allotted 15 acres by increased visitor use and intensity of use. The season extension from November to January is significant as it extends and intensifies the potential for conflicts with wildlife and habitat disturbance. The combination of additional lodging rooms and a season extension would increase the user days from 11,340 user days per year at present to 46,980 user days per year (overnight guests only). The current Holland Lake Lodge has had fairly low impact on wildlife and habitat because it has operated for decades at a modest size and has been closed during the winter.

Winter operations will increase the use season in the area. The previously unplowed roads leading to the lake will no longer be a winter refuge for wildlife or the remote ice fishing experience that many Montanans value. The Powdr proposal completely ignores the off-site impacts of this proposed development. Expanding development at Holland Lake will result in an additional 35,640 user days per year on public lands in the Holland Lake/Swan Valley area. These tens of thousands of additional users will not just stay at the 15-acre lodge site. These people will be spending an additional 35,000+ days on the public lands around Holland Lake and in the Swan Valley. This additional use will have significant negative impacts on wildlife and wildlife habitat and will forever change the character of the Swan Valley. The Powdr corporation will undoubtedly promote and market recreation on adjacent public lands such as mountain biking, mountain bike trail development, hiking, trail running, special pack trips into the adjacent Bob Marshall, skiing, XC skiing, and perhaps heli-skiing and heli-hiking in the Swan and Mission Mountains as enticements to come to their new Holland Lake Lodge.

The real attraction for Powdr corporation to invest in development at Holland Lake 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 area around Holland Lake is well inside the Northern Continental Divide Grizzly Ecosystem (NCDE) Grizzly Bear Recovery Zone. It is high quality grizzly bear and lynx habitat as well as habitat for many other native wildlife species. The proposed development expansion at Holland Lake will have significant negative impacts to thousands of acres of wildlife habitat and many species including grizzly bears and lynx, wolverines, furbearers, black bears, deer, elk and all the wildlife in the Swan Valley as

massive increases in recreation are promoted on adjacent public lands. Intensive recreation on public lands is a consumptive activity because it destroys wildlife habitat security. Existing levels of human land use are a limiting factor on healthy wildlife populations across the western United States.

Increased recreation in the Swan Valley because of this Holland Lake proposal will displace wildlife from formerly secure habitats into less secure areas where their mortality risk is higher. Intensive recreation will also increase stress and energetic demands on wildlife as they move away from human activity seeking areas of less human disturbance. The combination of impacts including more people coming to Montana and fueling accelerated private land development, climate change impacts to vegetation and habitats, and the massive increase in recreational pressure from this proposed Holland Lake development will have significant negative impacts on many wildlife species on public lands in the Swan Valley.

I believe there needs to be a balance between human development and wildlife and habitat conservation. The proposal does not achieve a reasonable balance for wildlife and habitat. I do not believe that this proposed expansion of the Holland Lake Lodge is in any way appropriate. It will produce cumulative negative impacts on grizzly bears and grizzly bear habitat. It ignores the enormous negative impacts to wildlife that will occur with this lodge expansion due to increased recreation on public lands outside the lodge site. For all these reasons, I request that the Flathead Forest reject this proposed commercial development of Holland Lake Lodge.

Thank you for considering my comments and request on this proposed action.

Sincerely,