

Data Submitted (UTC 11): 10/8/2022 3:42:32 AM

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Comments: When considering any kind of development proposal in the Seeley and Swan valleys, we must consider and address a number of important unique elements of both its natural physiographic character and the human culture and character of the community.

The Swan valley's importance to broader landscape integrity and connectivity has been well documented for the roles it plays in supporting multiple rare and endangered species. This has been reinforced through multiple broad and fine scale assessment and studies.

There is no other comparable forested, low elevation valley floor of its length, width, diversity and complexity that exists in the Northern Rockies. Its key landscape position provides both critical core habitats and connectivity habitats for multiple species on the larger landscape. This reality informed the rationale and basis of the public interest and agencies in acquiring and protecting the Plum Creek timberlands in the Seeley-Swan. Wise use stewardship, protection and conservation of this area's lands and waters has been a strong community ethic and theme of area residents and others who recreate or use the lands and waters of the Seeley-Swan and surrounding wild landscapes.

The weather shadow in the upper Swan Valley created by the high peaks of the Mission Mountains and amplified by Holland Canyon and the passes at the head of Holland Creek drainage create a unique weather shadow effect that corresponds with the core of the upper valley big game winter range. In heavy snow winters, big game from the western Bob Marshall, the Missions Mountains, and Seeley-Swan areas aggregate in the Holland Lake weather shadow for survival. Recreational user impacts in critical winter ranges adds stress to wintering wildlife. Many big game wintering areas around the region that are managed specifically as such are often closed to recreational use to reduce stress on wintering ungulates. This proposed expansion of winter recreational activities would substantially increase the human presence and impact on the winter range.

Independent of the Holland Lake Lodge expansion proposal, the Forest Service must evaluate and modify its recreational use and management program to address and manage effectively the unprecedented recreational use levels on the Swan Lake District and Flathead and adjacent national forests. The covid pandemic dramatically amplified the use levels occurring on roads, trails, campgrounds, dispersed sites and elsewhere.

Given this reality of the pandemic crush of user demand on public land and water and the reality of the Holland Lake Campgrounds being some of the most popular and heavily used areas on the Flathead NF, it compels us to decide how much is too much. How will we address and manage these issues into the future and accommodate the public's expectations and tolerance and the land and water and wildlife's ability to sustain its integrity and functions?

Given use levels, and trends the evidence points to the need for a comprehensive process between the FS and the public to evaluate, and make recommendations and changes needed in the recreation management program to address the related issues, including facilities and infrastructure, recreational use and resource impacts, trails and maintenance, user conflicts, and sanitation.

What are the limits of use and activity in any given area like Holland Lake, and what are current public expectations around that?

Our communities have experienced recent rapid changes in virtually every aspect of the social and environmental qualities of the places we love, cherish and live here for. We are reminded of this every time we try to pull out onto the highway or try to park at a trailhead. We feel a sense of loss for what is not coming back.

Residents want some sense of influence on current and future changes and issues. I believe this is why we are seeing such strong reactions and public engagement on this issue. I urge you to implement a more comprehensive review of social and environmental considerations and impacts.

Sincerely,
Tom Parker
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