

*Friends of the Wild Swan
PO Box 103
Bigfork, MT 59911*

September 9, 2022

Flathead National Forest

Attn: Kurt Steele, Forest Supervisor, Shelli Mavor, Project Lead

Sent via: <https://www.fs.usda.gov/project/?project=61746>

Dear Mr. Steele and Ms. Mavor,

Please accept the following comments on the proposed Holland Lake Lodge expansion on behalf of Friends of the Wild Swan.

The Flathead is proposing to categorically exclude this expansion from environmental analysis based on 36 CFR 220.6(e)(22) which is:

"Construction, reconstruction, decommissioning, or disposal of buildings, infrastructure, or improvements at an existing recreation site, including infrastructure or improvements that are adjacent or connected to an existing recreation site and provide access or utilities for that site. Recreation sites include but are not limited to campgrounds and camping areas, picnic areas, day use areas, fishing sites, interpretive sites, visitor centers, trailheads, ski areas, and observation sites. Activities within this category are intended to apply to facilities located at recreation sites managed by the Forest Service and those managed by concessioners under a special use authorization."

This categorical exclusion was intended for small projects such as:

- (i) Constructing, reconstructing, or expanding a toilet or shower facility;
- (ii) Constructing or reconstructing a fishing pier, wildlife viewing platform, dock, or other constructed feature at a recreation site;
- (iii) Installing or reconstructing a water or waste disposal system;
- (iv) Constructing or reconstructing campsites;
- (v) Disposal of facilities at a recreation site;
- (vi) Constructing or reconstructing a boat landing;
- (vii) Replacing a chair lift at a ski area;
- (viii) Constructing or reconstructing a parking area or trailhead; and
- (ix) Reconstructing or expanding a recreation rental cabin.

While a few of these items are included in the large scale proposal they are not stand alone and are tied to a full scale expansion of the entire Holland Lake Lodge complex. Building a restaurant, new lodge, more cabins and other facilities do not fit into this categorical exclusion.

Furthermore, the proposal does not even mention the extraordinary circumstances that are related to this proposed action. Resource conditions that should be considered in determining whether extraordinary circumstances related to a proposed action warrant further analysis and documentation in an EA or an EIS are: Federally listed threatened or endangered species or designated critical habitat, species proposed for Federal listing or proposed critical habitat, or Forest Service sensitive species. [36 CFR 220.6(b)(1)(i)]

The Holland Lake area is not only picturesque but also habitat for several threatened and proposed fish and wildlife species and their critical habitat as well as sensitive species. Holland Lake and Creek contains a disjunct population of bull trout and is designated bull trout critical habitat. Bull trout spawn in Holland Creek and move to Holland Lake to mature for several years before returning to the creek to spawn again. These bull trout do not migrate through the Swan River to grow and rear in Swan Lake like most other bull trout in the Swan Valley do (Lindbergh Lake is the other disjunct population in the Swan). While it is a small population it is genetically distinct and fills a unique niche.

The Holland Lake area is designated critical habitat for Canada lynx. It has deep snow in winter and has other habitat attributes that lynx require. Monitoring in the Swan Valley has detected lynx in this area.

The Holland Lake area is in the primary conservation area for grizzly bears in the Northern Continental Divide Ecosystem. The Swan Valley is a critical linkage between bears in the Bob Marshall Wilderness complex, Mission Mountain Wilderness, Rattlesnake Wilderness and other roadless habitats. While the Master Development Plan downplays the presence of grizzly bears by stating: "According to management, over the last 17 years, there has never been a grizzly sighting at Holland Lake Lodge. Nor are we aware of grizzly bears at Holland Lake or on the Holland Falls Trail. Black bear sightings do happen from time to time." This statement is ridiculous, just because no one has reported a grizzly bear sighting doesn't mean that bears don't use and frequent the area -- ask anyone who lives in the forest and puts up a trail camera.

Wolverine are proposed for listing under the Endangered Species Act. They have also been detected during monitoring surveys in this area.

The mere presence of four listed/proposed species is extraordinary and warrants evaluation in an Environmental Impact Statement and consultation with the US Fish and Wildlife Service.

In addition, this proposal doesn't upgrade or replace existing structures but increases the human footprint on the site and in the adjacent forest and lake by at least three fold. This is added to the heavily used campground with 40 campsites, a day use area and group site. This will put more pressure on the lake and trails as well as wildlife and fish which must be addressed as cumulative impacts to wildlife in an EIS.

An expanded season of use into the winter is also proposed. While not explicitly stated it is entirely possible that more winter development is forthcoming, especially since POWDR Corporation owns large ski areas throughout the country. It stretches credibility that this company wants to own and manage a small area on Holland Lake without having larger plans.

When the lodge was put on the market one of the promoted features was "Ability to land helicopter on property & floatplane on lake right in front of property" [*See* <https://www.land.com/property/1947-Holland-Lake-Lodge-Road-Condon-Montana-59826/7222264/>] An affiliate company of POWDR is Powderbird heli skiing so it entirely within the realm of possibility that even more expansion is in the works.

The National Environmental Policy Act requires a range of alternatives be evaluated for impacts to the environment as well as analysis of cumulative impacts. A categorical exclusion is not appropriate for this proposal, impacts must be analyzed in an Environmental Impact Statement. We urge the Flathead to extend the comment deadline and not be so hasty to push this project through.

/s/Arlene Montgomery
Program Director