



October 06, 2022

Kurt Steele, Supervisor  
Shelli Mavor, Project Leader  
Flathead National Forest  
Swan Lake Ranger District  
200 Ranger Station Road  
Big Fork, MT 59911

*Submitted electronically at: <https://cara.fs2c.usda.gov/Public//CommentInput?Project=61746>*

Re: Holland Lake Lodge Facility Improvement and Expansion # 61746

Dear Supervisor Steele and Project Leader Mavor:

Thank you for the opportunity to comment on the proposed expansion of the Holland Lake Lodge Facility Improvement and Expansion project. Glacier-Two Medicine Alliance (GTMA) is a grassroots conservation organization based in East Glacier Park that works to protect the lands, waters, and wildlife in the northern Crown of the Continent ecosystem; this work includes a long-standing commitment to the recovery of grizzly bears and other species of conservation concern. GTMA represents a diverse community of people, many of whom regularly use portions of the Flathead National Forest to hunt, fish, gather, or recreate or whom otherwise benefit from the environmental services, and aesthetic qualities the Forest provides. Please accept these comments on behalf of our Board and hundreds of members in NW Montana as a part of the official record.

Although GTMA typically focus on matters affecting the Flathead National Forest's Hungry Horse and Spotted Bear Ranger Districts, we have decided to comment on this project because it is yet another example in a frustrating pattern of poor public notification, misuse of Categorical Exclusions under the National Environmental Policy Act, and a general embrace of commercialized recreation without taking a hard look at the impacts on wildlife, environmental health, and existing uses. at the expense of wildlife, habitat, and the general public's enjoyment of their Forest. Furthermore, the Flathead National Forest's willingness to consider a proposed mega-expansion of a small resort located in occupied grizzly bear and lynx habitat by an out of state corporation highlights once again the glaring absence of a systematic strategic approach to managing increased visitation demands on the Forest in a balanced and measured manner.

For these reasons, GTMA strongly opposes the proposed expansion and improvements of Holland Lake Lodge. Our main concerns are that the project will harm grizzly bears and other sensitive wildlife, that it will irrevocably alter the character of the area, and that the process fails

to lawfully analyze the true scope of impacts the Lodge expansion would cause. These and other concerns are articulated more fully as follows.

**1. The Proposed Expansion Does Not Comply with the NCDE Conservation Strategy**

The NCDE Conservation Strategy guides the recovery and management of grizzly bears in the ecosystem. One of the Strategy's principal aim is to maintain the habitat conditions that existed when grizzly bear populations in the NCDE were stable or increasing population. It achieves this aim by, amongst other things, restricting new recreational development within the primary conservation area, which includes the lands affected by the Holland Lake Lodge project, to about one new site per decade per bear management unit. By comparison, the proposed Holland Lake Lodge project would more than triple the number of rooms at the Lodge, extend the operating season by three months, and add more than 35,000 overnight user days to the area per year. Clearly the Flathead is not holding up its commitment to follow the Strategy when it proposes a major new resort in the heart of prime grizzly bear habitat!

**2. The Project affects far exceed its 15-acre footprint**

The proposal focuses almost entirely on the changes to the physical plant infrastructure on the 15-acres covered under the special use permit. The project's impacts however, extend far beyond these 15-acres and need to be acknowledged, analyzed, and weighted in the decision. The proposal indicates it would nearly quadruple the number of overnight guests, partially as a result of adding three months to the current operating season. This does not include additional day-users who visit the area because of the Lodge's facilities (food, drink, restrooms) or future recreation opportunities the Powdr corporation will likely offer to entice people to visit. The expansion and improvements will irrevocably change this quiet, modest resort into a major, corporate-run recreation destination that operates deep into the winter. Consequently, substantially more vehicles will travel the Swan Highway, further reducing the ability of wildlife to move safely across a landscape where wildlife-vehicle collisions are already too common an occurrence. The changes will lead to 35,000+ more days' worth of people recreating across thousands of acres of sensitive wildlife habitat, eroding habitat security for grizzly bears, lynx, wolverines, elk and many other species leading to either increased conflicts or displacement to less secure habitat where the risk of mortality is higher. More user days also means more people hiking into the Bob Marshall Wilderness, which will reduce the outstanding opportunities for solitude as well as other aspects of Wilderness Character within a day+ hike from Holland Lake. Expanding the resort's capacity and operating season also creates justification to fuel further expansion of the area's recreation footprint – such as new trails for mountain bikes, equipment rental services, or skiing in an area that currently sees little winter use – to entice people to visit the Lodge. The proposed changes will undoubtedly alter the rural, quiet character and historic uses of Holland Lake, along the surrounding Swan and Mission Mountains and Swan Valley for the profit of a private, out-of-state corporation while wildlife, Wilderness, and the local community bear the burdens.

**3. Inadequate Public Notification**

Like good Washington bureaucrats trying to minimize public attention to bad political

news, the Flathead once again released a poorly considered proposal for public comment not only late on a Friday, but right before a holiday weekend as well, exactly the time when the least amount of people would take notice. The Flathead's pattern (see our comments on this spring's Special Use Permits, for example) strongly suggests current Forest leadership intentionally wants to restrict public input and participation. This pattern also says the current leadership views the public as an adversary and an obstacle to what they want to accomplish, rather than a valued partner who can provide important input to help ensure the better management decisions affecting the public's national forest lands. How arrogant! GTMA encourages the Flathead to be more thoughtful and open in its approach to public engagement. For starters, we suggest proposals be released early in the week with public notice disseminated via regional and local media, social media, and email to individuals and organizations who have commented on past projects or otherwise signed up for email notifications from the Flathead National Forest. As we've commented previously in relation to #4 below, the Forest also could better explain its rationale for a given project, including the analysis it has conducted so far and what the results indicate.

**4. The use of a Categorical Exclusion (CE) is inappropriate**

Again the Flathead is inappropriately relying on a CE to attempt a major upgrade to existing recreation infrastructure (see Bunker Creek) without conducting a sufficient analysis of the cumulative impacts of the project. The CE (36 CFR 220.6(e)(22)) used for this project states:

*“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.”*

This CE is intended to allow for ordinary, routine projects at existing sites for which the impacts are limited in scope and well foreseen, such as replacing an out-of-date toilet at a campground, or improving an existing boat ramp. This contrasts with this proposal, which contemplates a major, once-in-a-century overhaul and expansion of the current infrastructure at Holland Lake Lodge. As discussed in number 3 above, the impacts, particularly on wildlife, would extend spatially and temporally well beyond the 15 acres covered by the special use permit and the cumulative effects of this expansion are not easily foreseeable. Furthermore, all this activity is in occupied grizzly bear habitat and lynx habitat, both species protected under the Endangered Species Act, as well as wolverine habitat which is a candidate species. Given the size and scope of the expansion and its likely effects, along with the presence of ESA-listed species, the Forest Service cannot exempt this project from more extensive analysis under the National Environmental Policy Act.

**5. The Forest Lacks a Needs Assessment and Recreation Strategy**

This proposal's character and the use of a CE again highlights the Forest's current pattern

of reactively accommodating recreation demand rather than pro-actively planning for and directing increased recreation in a manner that balances resource conservation with the interests of recreationalists and other visitors. To start, the Forest should pause these compartmentalized projects and undertake a needs assessment for new outfitter, guide, and livery services outside of recommended wilderness as called for in the Forest Plan (see C-78 in the plan). It should also commit to finally undertake in 2023 the development of a long-contemplated recreation strategy for the Flathead. A strategy is needed to carefully guide growing recreation across the Forest and to establish better coordination with surrounding federal, tribal, and state land managers. Together the needs assessment and recreation strategy would, in conjunction with the Forest Plan, better inform whether a proposal like Holland Lake Lodge was even appropriate to consider. In addition to better decisions and outcomes, this thoughtful, strategic approach would provide the public greater confidence that the Flathead is acting as good stewards of the public lands and resources rather than what at the moment, appears to be as an extension of the Chamber of Commerce encouraging industrial-scale recreation and private commercialization to the detriment of other forest values and agency mandates.

### **In Closing**

In closing, we urge the Flathead to reject the proposed expansion and improvement of Holland Lake Lodge. The middle of the rural Swan Valley, on the edge of the Bob Marshall Wilderness, in vital wildlife habitat, is not the place for a mega-resort nor a prolonged visitation season. Thank you again for the opportunity to comment on this project.

Sincerely,



Peter Metcalf  
Executive Director