

October 6, 2022

To:

Michele Mavor – Project Leader, Michele.Mavor@usda.gov

CC:

Kurt Steele – Flathead Forest Supervisor, Kurtis.Steele@usda.gov

Chris Dowling – Swan Lake District Ranger, Christopher.Dowling@usda.gov

Comments Re: Holland Lake Lodge Facility Expansion Project

Project Leader Mavor:

Thank you for the opportunity to comment on the Holland Lake Lodge Facility Expansion Project and for your careful consideration of this letter.

We wish to incorporate by reference the comments of the Swan View Coalition (10/5/22), John Gatchell (10/6/22), and Chris Servheen.

As we write this, over 6,000 people have already submitted comments on this project. The volume of unique comment letters should give the Forest Service pause. It is rare that the public's concern for a landscape is so great that such a large number of people, from subject-matter experts to forest-users who have a connection to Holland Lake, would take time out of their busy lives to submit a personalized comment letter. The message for you is clear: Holland Lake and the Swan Valley are not landscapes that the public wants to see developed by major resort operators like the POWDR Corporation, especially on public lands.

The Swan Valley is a mini Glacier National Park without the pretense, commercialism, or crowds. Anyone who visits this remarkable valley comes away deeply moved by its quiet beauty, incredible biodiversity, and awe-inspiring vistas. Holland Lake and surrounding lands and waters are home to grizzlies, wolverine, bull trout, and countless other species found few other places in the lower-48 after centuries of habitat destruction and degradation.

Our family of three has visited Holland Lake on many occasions. Each season brings a new opportunity to revel in the majesty of this wild landscape at the foot of the Swan Front Recommended Addition to the Bob Marshall Wilderness. Whether skimming the surface of the lake on cross-country skis on a cold midwinter morning, climbing to Holland Lookout on a summer day to peer into the Bob Marshall Wilderness, or wandering the short trail to Holland Falls for a view over the valley during peak fall foliage, Holland Lake offers a multitude of experiences for people seeking rejuvenation, inspiration, and exhilaration at nature's pace.

As many other individuals and organizations have made clear, POWDR Corporation's proposal warrants an Environmental Impact Statement rather than a cursory Categorical Exclusion. The presence of endangered species, adjacency to a Recommended Wilderness,

proposed expansion of the physical footprint, and potential water quality impacts all warrant detailed environmental review, among other reasons.

The Flathead NF (FNF) has inappropriately characterized the purpose and need of this project. Put simply, the FNF inexplicably jumped to an unjustified conclusion that a major resort expansion is the only way to deal with the Holland Lake Lodge (HLL) owner's choice to sell. The current framing is a self-fulfilling prophecy that purely serves the business interests of POWDR, and gives short shrift to public interests and the irreplaceable resource that is Holland Lake.

The HLL scoping letter describes deteriorating historic lodge buildings, inadequate trailhead facilities at the neighboring public parking lot, and mentions that there is an increase in visitation to the Swan and Flathead Valleys. Even if we take the FNF at its word, none of these descriptions of the current situation would lead anyone other than POWDR Corporation's executives to conclude that the best way to remedy the situation is to construct a mega-resort for wealthy Americans at Holland Lake, dramatically expanding the footprint of the HLL facilities, tripling the guest capacity, destroying historic lodge structures, constructing dozens of new buildings, and installing a massive water treatment facility, among other proposed modifications.

In an EIS, the FNF must assess an adequate range of alternatives that examine all reasonable actions that could be taken to address the needs identified in the scoping letter. For example, the lodge could be converted into a historic rental cabin; the lodge could be turned into an education and interpretation center for the Crown of the Continent; or the lodge could even be destroyed. All of these would likely have fewer impacts on the environment and visitor experience of Holland Lake than the current proposal.

We trust that the sheer amount of public concern, coupled with the legal shortcomings of the current Categorical Exclusion, will result in this project proposal being rejected outright or given rigorous analysis under NEPA. The current proposal is entirely inconsistent with the long history of management at Holland Lake.

Awe and wonder are still available in abundance at the foot of the mighty Swan Range, although they are becoming increasingly rare commodities in Western Montana, much less across the nation. The Forest Service would be wise to pause and rethink how it can best serve the *Greatest Good for the Greatest Number for the Longest Time* in this storied and exceptional landscape.

Please add our email addresses to your project mailing list.

Sincerely,

Zack Porter and Kassia Randzio
Montpelier, VT