

The Holland Lake Lodge in the Swan Valley was sold to an out of state corporation - POWDR - which has numerous ski areas around the country. They have announced big plans for expanding the facility with a new lodge, restaurant, 26 cabins, parking lots and more. Since the lodge has a Special Use Permit from the Forest Service they must have approval for these changes and additions.

The Flathead National Forest has proposed using a categorical exclusion to exempt the project from environmental analysis. The categorical exclusion they intend to use is typically for small projects with no environmental impacts, but this proposal far exceeds the scope and limitations allowed.

The proposal does not mention the extraordinary circumstances that are related to the proposed expansion such as federally listed species, designated critical habitat, species proposed for Federal listing or proposed critical habitat, or Forest Service sensitive species.

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. Wolverine are proposed for listing under the Endangered Species Act. The area has deep snow in winter and other habitat attributes that lynx and wolverine require. Monitoring in the Swan Valley has detected both animals 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 for genetic interchange between bears in the Bob Marshall Wilderness complex, Mission Mountain Wilderness, Rattlesnake Wilderness and other roadless habitats.

The mere presence of four listed/proposed species is extraordinary and warrants evaluation in an Environmental Impact Statement (EIS) and consultation with the U.S. Fish and Wildlife Service to analyze the impacts.

The roadless lands on the Swan Front are recommended for wilderness designation in the Forest Plan and Northern Rockies Ecosystem Protection Act.

This proposal doesn't just upgrade or replace existing structures but increases the human footprint on the site by three-fold which will impact the adjacent forest and lake. This is in addition to the heavily used campground with 40 campsites, a day use area, boat ramp and group site. Expansion will put more pressure on the lake and trails as well as wildlife and fish which must be addressed as cumulative impacts to wildlife and the wilderness character 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 as well as a helicopter skiing company. Why would an adventure lifestyle company want to own and manage a small area on Holland Lake without having larger plans?

These are public lands that belong to everyone in the U.S. The wildlife, scenery, clean water and wilderness are ours. We must preserve the wild character of this amazing place — expanded development will not do that.

Arlene Montgomery, of Swan Lake, represents Friends of the Wild Swan.