



Kurtis Steele, Forest Supervisor  
c/o Chris Dowling  
650 Wolfpack Way  
Kalispell, MT 59901  
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September 9, 2022

Re: Holland Lake Lodge Facility Improvement & Expansion

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

Dear Supervisor Steele,

Thank you for the opportunity to comment on the Holland Lake Lodge Facility Improvement and Expansion project proposal. Winter Wildlands Alliance (WWA) is a national non-profit working to inspire and empower people to protect America's wild snowscapes. Our alliance includes 34 grassroots groups in 14 states, including in Montana. Management of the Flathead National Forest is of keen interest to WWA, as evidenced by our engagement throughout the Flathead forest plan revision and subsequent (ongoing) travel management process to address suitability changes. Many of our members and supporters ski, snowshoe, and cross-country ski in the Swan Range, including in the vicinity of Holland Lake Lodge, and hike in this area in the summer.

Holland Lake Lodge has proposed a significant expansion of their facilities and we are very concerned that the Flathead National Forest intends to categorically exclude this project from robust environmental review. It is not appropriate to apply the categorical exclusion referenced in the scoping document – 36 CFR 220.6(e)(22) – to a project of this magnitude, nor can this CE be applied to facilities operated by Special Use Permit holders *not* operating as concessioners. Government-owned concessions are authorized by special use permits issued under Section 7 of the Granger-Thye (GT) Act, 16 U.S.C. 580d, and implementing regulations at 36 CFR Part 251, Subpart B. To the best of our knowledge, POWDR Corp and Holland Lake Lodge LLC are not Forest Service concessionaires, and the Holland Lake Lodge is not a federally-owned facility eligible for a Forest Service concession.

The Categorical Exclusion outlined in 36 CFR 220.6(e)(22) applies to 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. Applicable 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. It is notable that the CFR does not outline retail space, hotels, or restaurants in this extensive list of applicable sites. The CFR goes on to state that activities within this category are intended to apply to *facilities located at recreation sites managed by the Forest Service and those*

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*managed by concessioners* under a special use authorization. As previously stated, we have no reason to believe that Holland Lake Lodge is operated under a Forest Service concessionaire agreement, as it is not a federally-owned facility. Indeed, both the Master Development Plan and Scoping Notice note that the Lodge operates under a Resort/Marina Term Special Use Permit. This is a completely different type of special use authorization from a concessionaire agreement.

Finally, the CFR gives examples of the types of facilities this Categorical Exclusion is intended to apply towards. These are:

- (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 some of the projects that POWDR Corp. has proposed for Holland Lake Lodge align with these listed examples, such as (ii) and (viii), the massive amount of new construction that POWDR Corp. has proposed (as outlined in the Proposed Activities section of the scoping package) goes far beyond the scope of 36 CFR 220.6(e)(22) *even if* Holland Lake Lodge were a government-owned facility and/or POWDR Corp operated the lodge under a concessionaire agreement. A complete reinvention of Holland Lake Lodge, with 32 new buildings totaling over 31,000 square feet of new construction, extensive infrastructure upgrades and development, and other developments clearly meet the NEPA “significance threshold”. It is unheard of for the Forest Service to consider and approve a major resort expansion under a Categorical Exclusion – a project of this magnitude clearly requires analysis under an Environmental Impact Statement. As with any other project proposed to the Forest Service by a private corporation, the Forest Service should enter into an agreement with POWDR Corp. to identify a 3<sup>rd</sup>-party contractor to conduct an environmental impact statement – paid for by POWDR Corp.

Federal regulations state that applicable projects may only be excluded under 36 CFR *only if* there are no extraordinary circumstances related to the proposed action *and if* the proposed action is within one of the categories established by the Secretary at 7 CFR part 1b.3 or the proposed action is within a category listed in § 220.6(d) and (e). None of these conditions are met by this proposed action and this project cannot be categorically excluded from documentation in an environmental impact statement.

There is a clear cause and effect relationship between this proposed action and the potential for significant effects on multiple resource conditions defined in §220.6(b). For example,



§220.6(b)(1)(i) - federally listed threatened or endangered species or designated critical habitat, species proposed for Federal listing or proposed critical habitat, or Forest Service sensitive species. Holland Lake Lodge is within occupied lynx and grizzly bear habitat and the area around the Lodge may be occupied by one or several Species of Conservation Concern. We have significant concerns about how a major resort development at Holland Lake – and the potential for winter activities at this resort – will impact grizzly bears and lynx. Likewise, §220.6(b)(1)(iii) - Congressionally designated areas, such as wilderness, wilderness study areas, or national recreation areas – is a clear resource condition in this project area. Holland Lake is a popular access point for those seeking to hike and ski in the Bob Marshall Wilderness and the Swan Front Recommended Wilderness Area. The Proposed Action will bring substantially more people to an already busy area, and will directly impact Wilderness character in these areas. These are just the two resource conditions we are most familiar with, but before deciding to employ a categorical exclusion the Forest Service must screen for extraordinary circumstances and describe to the public why extraordinary circumstances are or are not present in the project area.

Holland Lake is a beloved recreation destination and Holland Lake Lodge is part of the history of this area. We are not necessarily opposed to upgrades or improvements at the Lodge, but it is imperative that the Forest Service carefully analyzes the proposed action through a detailed environmental review process that considers indirect, direct, and cumulative effects, impacts to non-resort visitors at Holland Lake, impacts to water quality (especially considering the proposal for significant increased visitation and the proximity to Holland Lake), sound impacts from generators and lodge activities, impacts to the Bob Marshall Wilderness and Swan Front recommended wilderness area, impacts to wildlife, and other environmental concerns. In addition, given that the Holland Lake Lodge Master Development Plan alludes to a desire to expand into winter activities<sup>1</sup> and that this potential expansion into winter is also mentioned in the scoping letter, WWA is particularly interested in POWDR Corp's plans for winter activities at Holland Lake, and would like to see these plans articulated and analyzed in the EIS.

Thank you for considering these comments and please inform me of any future developments or comment opportunities associated with this project.

Sincerely,

A handwritten signature in black ink, appearing to read "Hilary Eisen", written over a white background.

Hilary Eisen  
Policy Director

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<sup>1</sup> See Holland Lake Lodge Master Development Plan, page 11, Section 4.1: "Operating Season. Holland Lake Lodge will initially be operated during the summer season, (approximately May 15th to October 15th). However, all new buildings will be winterized in the anticipation that there may be sufficient demand to operate a winter season as well (approximately November 20th to January 15th)"