



October 3, 2022

Flathead National Forest
650 Wolf Pack Way
Kalispell, MT 59901

Re: Holland Lake Expansion Proposal Comments
Attn: Kurt Steele, Flathead Forest Supervisor and Shelli Mavor, Project Lead
Sent via: <https://www.fs.usda.gov/project/?project=61746>

Flathead Forest Supervisor Kurt Steele and Project Lead Shelli Mavor,

Please consider the following comments concerning the Holland Lake Lodge Expansion. Friends of the Bitterroot of Hamilton, MT is a local organization dedicated to protecting wildlife, wild places, and forest ecosystems. Many of our members have enjoyed the unique character of Holland Lake and the surrounding area and hope to continue to do so in the future.

Thank you for extending the deadline for commenting on this project. This proposal has amassed over 5000 comments at the date of this letter, demonstrating how important Holland Lake is to the public. We urge you to consider an alternative that upholds the current footprint of the lodge and maintains use near existing levels, to preserve this unique part of Montana. Or consider an expansion that caters to the people historically served by the lodge by increasing camping or modest, small cabins to a level that does not require further water treatment infrastructure.

A Categorical Exclusion (CE) is proposed for this project. According to 36 CFR 220.6(e)(22), a CE is meant to be used for small projects including:

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

This list does not include a choice for “all of the above.” The Holland Lake Proposal includes many of these items and more. A CE may be used for a small project not a full-scale expansion with multiple construction projects that increase current capacity more than threefold. This proposal not only increases capacity, it includes winterization allowing year-round use of the area that will greatly increase user days. This is a substantial change in footprint and use. It is far from a small project with little environmental impact that would qualify for a CE.

Documentation offers no discussion of Extraordinary Circumstances which would preclude the use of a CE. This area provides habitat for several species protected by the ESA. Critical Canada lynx habitat

surrounds the Holland Lake area. The presence of deep snow and snowshoe hare habitat support the recovery of Canada lynx and monitoring in the area has verified presence. Please provide a map of snowshoe hare habitat in the area as well as Canada Lynx critical habitat.

Holland Lake and Holland Creek are designated critical habitat for a distinct population of bull trout. Albeit a small population, it is genetically distinct to this area and fulfills a unique role. This population would be highly vulnerable to changes in the Holland Lake area, especially their natal spawning area in Holland Creek.

Holland Lake is within a primary conservation area for grizzly bears. It offers connectivity for bears between multiple populations in the Bob Marshall, Mission Mountains, and the Rattlesnake. The development plan states that in 17 years, no grizzlies have been seen at the lake or on the trail. Yet, a recent op-ed (Attachment A) by owner Christian Wohlfeil, discusses an 800-pound grizzly bear that appeared as an unexpected guest at a wedding. Furthermore, a lack of grizzly sightings on the property does not verify bears are not present in the area or passing through. For example, trail cameras in the Swan Valley have shown numerous bears passing through the valley in the night, unbeknownst to residents.

Wolverine that are proposed listed have been verified in the area. Myriad sensitive species are also present. Current documentation does not consider the legally protected migratory birds and eagles that utilize the lake and surrounding area.

Presence of listed, proposed listed, sensitive species, eagles, and migratory birds demonstrates extraordinary circumstances that preclude a CE and mandate an Environmental Impact Statement (EIS) be prepared including consultation with the United States Fish and Wildlife Service (USFWS) and a full range of alternatives. Furthermore, the documentation does not consider the impact of a development allowing increased user days and winter use on thousands of acres of wildlife habitat surrounding the 15-acre permit area.

The lodge and cabins are under consideration for the National Registry of Historic Places. The petition was completed in 2020 by North Wind Resource Consulting at the behest of Christian Wohlfeil of Holland Lake Lodge to “assist with site management, maintenance, and improvements.” At that time, no changes to the area were proposed. Contributing resources toward preservation according to the petition are “the lodge, a single-family residence (now a gift shop), four guest cabins, a barn, and a storage shed (p iv)” According to the plans many of these resources will be razed, “Demolish and remove multiple structures including the gift shop, five cabins, storage shed (scoping p 3).”

This also constitutes an extraordinary circumstance for the area and any changes would be subject to analysis and compliance with the National Historic Preservation Act (NHPA).

The development plan would increase capacity of the lodge by three times, construct a large restaurant on the lake’s edge and winterize the cabins and lodge increasing time and seasons used. Housing for 12 year- round employees and 5 more recreational vehicle hookups for summer employees are in the plans. More capacity for more time during more seasons will generate cumulative effects on the lodge complex and the species that rely on habitat in the surrounding area. How will this “benefit the general public and protect public and natural resource values” as mandated for a special use permit?

The lodge sits on Management Area 7 in the forest plan. Focused Recreation Areas typically include “public recreation areas at or near a lake, large campground, developed ski area or year-round resort. Recreation in these areas is already occurring and is often enhanced by further development to increase public access and benefit local economies (scoping p 2)”. POWDR corporation currently owns and operates many resorts for the elite including ski areas charging as much as \$165 a day, heli-skiing operations offering private excursions for \$16,000-\$18,000, semi-private excursions for \$6,000-

\$8,000, day trips for \$1600-\$1800, and cat skiing operations charging \$600 a day. This type of operation would exclude many local Montanans that have historically enjoyed Holland Lake for decades. There is no mention of why the area is being winterized, but it seems any of these could be in the future plans. A heli-pad already exists at the lodge according to realtor information (<https://www.land.com/property/1947-Holland-Lake-Lodge-Road-Condon-Montana-59826/7222264/>) and float planes are currently allowed on the lake. What is the current use allowed for this heli-pad and how often has it been used in the past decade? What was the NEPA used to allow it? How would expensive skiing excursions “benefit the general public” that cannot afford them? Does the new expansion preserve the “place to land a helicopter”?

Gates are a part of the development plan. These gates will dissuade public land owners from enjoying their public lands. Gates should not be authorized. A private entity should not be allowed to discourage public use of public lands through a special use permit. Gates discouraging public access to public lands are not in the public interest.

The Forest Plan includes the following standard (FW-STD-REC) 01, “Within the NCDE primary conservation area, the number and capacity of developed recreation sites on NFS lands that are designed and managed for overnight use by the public during the non-denning season (e.g., campgrounds, cabin rentals, huts, guest lodges, recreation residences) shall be limited to one increase above the baseline (see glossary) in number or capacity per decade per bear management unit.” This standard applies to the Holland Lake Lodge that is located within the Big Salmon Bear Management Unit (BMU) in the Northern Continental Divide Ecosystem (NCDE) primary conservation area. The approval of this development at Holland Lake would preclude the expansion or development of any public campgrounds in the BMU for the next ten years. Public campgrounds are more accessible and affordable to the general public that would not be able to afford a family vacation in a developed resort as planned in this permit application. Improvements that do not exceed the current footprint and guest capacity will best meet the greater public interest. A survey and assessment of all facilities managed for overnight use in the BMU should be included in analysis.

According Wohlfeil’s op-ed (Attachment A), he “decided to pass the lodge to another steward.” The Forest Service (decision-maker Forest Supervisor Kurt Steele) is not obligated to issue a new permit to the party who acquires title to the improvements and certainly not obligated to authorize the scale of development being proposed. In addition, the HHL 456 Permit Amendments #1 & #2 show pre-decisional bias. The Master Development Plan (MDP) is not even through the scoping period that began September 1 yet Amendment #2, signed August 22, authorized the two wells **proposed** in the MDP. Amendment #2 also authorizes a Holland Lake Lodge Inc. representative to sign permit applications and is co-signed by Brian Stewart (listed in the MDP as Primary Contact, not Christian Wohlfeil). Any change in control of the business entity as defined in permit section J-1 shall result in termination of the permit. The party acquiring control must submit an application for a permit (not simply be amended to the current permit that lists Christian Wohlfeil as owner).

Increasing the capacity and year-round use of the area will affect nearby forest service roads that tax payers maintain. This has not been discussed in project documentation. How will patrons access the area in winter? Who will be responsible for making the area accessible? Access and the roads necessary to accommodate access must be included in project area for analysis.

How will this project and future development affect the quality of the adjacent Bob Marshall Wilderness? Currently the Powderbirds (owned by POWDR), land helicopters on the edge of the Wilderness boundary in Utah. The skiers then ski into Wilderness and are picked up at the bottom of drainages just outside Wilderness boundaries. This affects the solitude and quiet recreation available to the public by Wilderness. It would be disappointing at best to ski or snowshoe for a few hours to Wilderness only to experience a helicopter landing nearby multiple times to drop off and pick up skiers.

Research shows helicopters affect denning bears. In a guide to analyze the effects of helicopter use on bears, the Northern Idaho/Montana biology team summarized, “in summary, the available evidence suggests that aircraft flying at relatively low altitudes in occupied habitat can elicit a response by grizzly bears. Effects may range from a simple awareness of the aircraft (i.e., raising the head but otherwise continuing uninhibited) to short term disturbance or flight response (resulting in physiological changes such as increased stress and energetic demands) to temporary displacement from an area (Attachment B p 2). Crupi et al 2020 (Attachment C) found evidence of den abandonment from low elevation helicopter use that would be necessary to drop off and pick up skiers.

A recent proposal to allow heli-skiing in the Teton National Forest was cancelled due to effects to denning grizzlies. It seems disingenuous at best to approve this expansion and expense when future plans could very well be thwarted. The future business plan and profit analysis by POWDR concerning the acquisition should be part of the public record. The public should be aware of future development plans for the area by the corporation during the comment period concerning this proposal. The proposal will be costly, it seems quite probable that a lucrative business venture is in the works. What are they planning to charge at the lodge and cabins? Surely, POWDR has calculated what it would take to recover their investment. Future plans including proposed price points should be disclosed.

The Holland Lake Lodge Outfitters business license expired in 1997. Are there outfitter permit applications for activities out of Holland Lake Lodge in the works? Are any being pursued by POWDR or their subsidiaries? If so, what are they requesting in terms of user days, etc. Please keep us informed of any proposals to operate outfitting in the area around and out of Holland Lake Lodge. We would hope this information will be included in the public record for this proposal, so the public is able to provide meaningful comment.

For a proposal of this magnitude, NEPA requires a full analysis including a full range of alternatives, consultation, and analysis of cumulative effects. The numerous comments show public concern for the area and the detrimental effects this proposed expansion will have on public visitors and the wildlife that rely on habitat surrounding Holland Lake Lodge. Your decision on this proposal should be to “benefit the general public and protect public and natural resource values.” Thank you for considering our comments and please keep us informed of this project in the future.

Sincerely,

Jim Miller, President

Friends of the Bitterroot