

October 5, 2022

Rachel Feigley
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Dear Kurtis:

Thank you for the opportunity to comment on the Holland Lake Lodge Facility Expansion project proposal. Please accept my comments below for the public record.

The proposed action includes many aspects beyond building construction and a CE is not the appropriate analysis option. Disturbance from the proposed building construction, internet line, trailhead expansion, water system and wastewater treatment, development of parking areas, and vegetation management *as combined*, do not fit the intensity level implied for use of the CE categories. The proposed action should be analyzed in an EA. The EA should display a full range of alternatives to restore the lodge with the original proposed action being the maximum development alternative.

The scope and scale of the proposed development, including all the necessary upgrades to existing infrastructure, new construction, parking areas, wastewater treatment is out of proportion for the relative size of the lake as indicated in the proposed waterfront view. Constructing a lodge of this size on Holland Lake misses the mark of balancing the intent of the permitted concessions on Forest Service lands that benefit the general public AND protect public and natural resource values.

In addition, the USFS should retain ownership of all water rights; this is giving a 'right' to a private entity while the permit is a 'privilege'. While the permit is discretionary, and may be canceled in the future, the water right would remain with a private entity rather than with the American people.

The scoping letter states that part of the purpose and need is to serve the increasing demand in the Swan and Flathead Valleys. Flathead Valley already has numerous resorts ranging from high end to less expensive options, many of which are on lakes. There is also ample private land for further resorts to be constructed if public services are lacking in the Flathead Valley area. In addition, POWDR and Wohlfeil have said they already get guests from all over the country and the world, not just locals such that it is providing this service currently. What data is being used that demonstrates increased demand and for what types of uses or services in what locations?

The messaging that this scale of development is necessary to be sustainable is misleading. To begin, the current Holland Lake Lodge website regarding accommodations states *"With six cabins and nine*

rooms, the Lodge has plenty of options for accommodations that help you experience Holland Lake and the surrounding area to the fullest during your all-inclusive stay.” And regarding amenities *“The Lodge has everything you need to make your stay comfortable and rejuvenating.”* The lodge is a permitted resort on NFS lands and thus discretionary, and the proposed expansion lies on lands owned by all Americans. Does the Flathead Forest really want this level of encumbrance on NFS lands? Does the USFS have the responsibility to ensure financial gain of the permittee, and if so, to what level of profit?

The portion of the proposed action that describes trailhead expansion and other recreation facilities outside of the Holland Lake Lodge permitted area should be considered in a separate NEPA analysis and be based on a needs assessment that considers other recreation facility infrastructure within Swan Valley. It is confusing as to why Holland Lake Lodge would need the trailhead expanded for their operation to be successful. The trailhead expansion is not a connected action. If the SST is not adequate for level of use, perhaps it can be pumped more often? Also, the Owl Creek stock facilities already adequately and appropriately separate the user groups to minimize user conflicts and reduce trail maintenance due to heavy stock use.

Development of the HLL Facility Expansion as proposed would likely reverse the eligibility of the original lodge and the property itself for listing in the NRHP as a historic district under Criterion A for its association with remote recreational ranch properties. The report written by North Wind Cultural Resources in 2020 states that the “property retains integrity of location, design, setting, materials, feeling, and association.” Building new cabins in the Adirondack design does not mitigate for the loss of integrity of these characteristics and detracts from any historical significance. Between multiple new buildings, upscale construction, RV trailer pads, loss of open space and conversion to parking areas, vegetation treatment, and year-round use, the characteristics that the eligibility was based upon will be destroyed.

A reference to partnerships with outfitters was made indicating that POWDR is planning to offer activities outside the footprint of the permitted area. The types of activities should be specifically defined and fully disclosed as part of the cumulative effects analysis.

Other cumulative effects on the surrounding landscape should be analyzed. This should include potential incursion by mountain bikes into the Bob Marshall Wilderness, potential illegal use of electric bikes on non-motorized trails, potential safety issues with an increased mix of recreation users, impacts of projected increased user days, and cumulative effects to the grizzly bear.

Standard Operating Procedures (SOPs) should include State of Montana Best Management Practices for weed management. As indicated in the proposal, the SOPs should also include Missoula County

permitting processes and regulations for building permits and approvals outlined in the Missoula County Building Projects and Permit Guide; Missoula County Shoreline Regulations which apply to lake, river, and stream shoreline development; and Missoula City-County Health Code for Wastewater Treatment and Disposal Systems.

The following are mitigations and/or modifications to the proposed action that should be addressed and/or included in the EA:

- Repair and provide maintenance to existing lakeside cabins, rather than new construction of lakeside cabins, to retain NRHP eligibility and original character of the property.
- Reduce proposed accommodation capacity levels by reducing the number of new cabins and size of new lodge.
- Combine the welcome center, restaurant, and gift shop into one facility separate from the old historic lodge.
- Eliminate or reduce the seasonal floating boat and swimming docks.
- Non-motorized pathways to be used for connectivity should be kept as native material, i.e. not covered with crushed rock.
- Retain trees of medium to large stature within the parking areas to provide shade, improve aesthetics, and keep area more natural in setting.
- Water rights from water systems should be solely in the ownership of the USFS.
- Any planted horticultural vegetation (trees, shrubs, flowers) should be native in origin.
- No motorized boat/ jet ski rental shall be permitted.
- No motorized boat/jet ski rental shall be established for guests through outfitter partners at adjacent recreation facilities.
- Consultation should be conducted with Montana State Historic Preservation Office regarding the loss of eligibility from the NHRP listing.
- To mitigate for the increased demand for services and potential types of requested guest uses, the boat launch should not be upgraded to accommodate large boats.
- Collaboration with Montana Fish, Wildlife and Parks should move to restrict boat size.

Sincerely,

/s/Rachel Feigley
