



October 5, 2022

Superintendent Kurtis Steele
Flathead National Forest
650 Wolfpack Way
Kalispell, MT 59901

U.S. Forest Service, Swan Lake Ranger District
200 Ranger Station Road
Bigfork, MT 59911
Attn: Shelli Mavor (Holland Lake Lodge)

Re: Holland Lake Lodge Facility Expansion #61746

Dear Superintendent Steele,

I write on behalf of Preserve Montana, to convey our opposition to the request by the POWDR corporation of Park City, UT and Holland Lake Lodge, Inc. (HLL) for a special-use permit to intensively redevelop the historic Holland Lake Lodge property, including plans to extensively renovate or demolish all but one of the historic buildings within HLL's currently-permitted 10.53 acres.

Preserve Montana was founded in 1987, with a mission to save and protect Montana's historic places, traditional landscapes and cultural heritage. We work statewide with communities and owners of historic properties, to encourage preservation through education, advocacy and direct restoration work. We have a long-standing relationship with numerous public land-managing agencies, and have worked extensively with USFS heritage programs throughout Region 1 for more than three decades.

We were stunned, along with the public at large, to learn just a month ago of the plans proposed by the POWDR Corporation and Mr. Christian Wohlfeil, HLL, to aggressively redevelop the historic Holland Lake Lodge as a high-volume, full-season resort by tearing down and replacing, or dramatically renovating, all but one of the historic buildings on this National Register-eligible property. Moreover, we were astonished to learn that despite the highly adverse impacts to historic and natural resources associated with this proposal, as Flathead Forest Superintendent your plan is:

"Based on a preliminary assessment, intentions are to categorically exclude the proposed project from documentation in an environmental impact statement or an environmental assessment under 36 CFR 220.6(e)(22)."

Misuse of Categorical Exclusion 36 CFR 220.6(e)(22): Holland Lake is a jewel in the lake district of western Montana. It sits on the western doorstep to the Bob Marshall Wilderness, and is one of those special places where Montana families have gone camping, hiked to the waterfalls, picked huckleberries, paddled our canoes, and gone swimming and fishing for generations. Holland Lake Lodge is a beloved heritage property to people of our state with significance that resonates far deeper than a National Register listing. It is the kind of authentic Montana place that everyone cherishes, and that, in this era, is increasingly endangered by out-of-state development interests.

Flathead Forest agency personnel have for many decades rigorously protected these public lands, historic values, pristine lake and surrounding environs – until now. We vigorously challenge the agency's decision to consider this project under a Categorical Exclusion (CE) to the National Environmental Protection Act (NEPA) that was intended to facilitate routine operations, not to avoid

responsible environmental review of large-scale developments. To limit the process in this way effectively prevents the consideration of significant impacts to the human and natural environment of Holland Lake, avoids meaningful public engagement, fails to account for impacts to sensitive, threatened and endangered species, and precludes consideration of alternatives that would rightsize the project, explore adaptive reuse alternatives, preserve rather than destroy historic values, and have a lighter impact on the wildland environment in which it sits.

The CE's to NEPA adopted by the Forest Service in 2020 were expressly "to apply to activities which agencies have determined from analysis and experience to not have significant environmental impacts and therefore do not require more detailed environmental analysis." Intensive redevelopment of a historic property adjoining a pristine wilderness environment clearly does not fit this model.

As stated in 36 CFR 220.6:

(a) General. A proposed action may be categorically excluded from further analysis and documentation in an EIS or EA **only if there are no extraordinary circumstances related to the proposed action** [emphasis added] and if:

(1) The proposed action is within one of the categories established by the Secretary at 7 CFR part 1b.3; or **(2)** The proposed action is within a category listed in § 220.6(d) and (e)

In the words of the Forest Service itself:

"Activities must be within the size and scope described in the categorical exclusion, and the agency must consider whether there are extraordinary circumstances which would preclude the use of the categorical exclusion. If the action does not fit within a category, or if extraordinary circumstances apply, the agency must conduct an environmental assessment or environmental impact statement." [emphasis added, source: <https://www.fs.usda.gov/emc/nepa/revisions/pcesupportinginfo.shtml>]

Respectfully, Holland Lake is an exceptionally sensitive natural environment, and your inclination to apply a CE and limit public input within a confused process and a 3-5 week window is quite simply insufficient. As we write this letter, the number of comments exceeds 5,800 – almost all opposed. This outpouring of public opposition sends a clear message that your agency's seeming inclination to approve a permit for this expansion with inadequate public input, and lacking in-depth biological data is a grave mistake.

Historic Significance and Impacts to Holland Lake Lodge: We understand that Holland Lake Lodge was rightly deemed eligible for listing in the National Register of Historic Places, for its outstanding historic values, following submission of a Determination of Eligibility (DoE) by your agency to the Montana State Historic Preservation Office (MT SHPO) and their concurrence on Feb 8, 2021.

While there is widespread recognition that the Holland Lake Lodge complex has long needed maintenance and repair, the DoE recorded each building and structure, confirming that the level of overall integrity for the property is excellent, the historic buildings retain a very high level of integrity and with the exception of the modern caretaker's house, the non-contributing elements are either small-scale scale or temporary within the historic district boundaries.

As proposed in the MDP, the renovated Holland Lake facility will obliterate or overwhelm most all of the historic buildings and character of this 10+acre parcel. The lodge will suffer an out-scaled, insensitive addition that will severely damage its integrity inside and out, all the historic cabins will be demolished, and the landscape will be stripped of dozens of trees. What was historic and scaled to the lakeside setting will be replaced with a 28-room, 13,000 square foot lodge, 26 new cabins, a large employee

bunkhouse, a maintenance building, a welcome center, a watersports building, a new 3,000-square foot restaurant and large asphalt parking lots. Only the barn, which stands a bit apart from the rest of the complex, will seemingly be spared from this heavy-handed treatment (though we note the applicant suggests it is dilapidated and unsafe, which may forecast its removal in the near future as well.) Thus, from a standpoint of historic integrity, the site will have lost most all of its important attributes.

Need for National Historic Preservation Act (NHPA), 36 CFR § 800 (Section 106) Review: In their Holland Lake Lodge Master Development Plan, POWDR presents the following:

1.1 REQUEST FOR APPROVAL We request the following from the U.S. Forest Service: 1. Timely review and approval of the MDP. We request the MDP be approved with the understanding that further submissions to USFS are required prior to construction (e.g. proposed action, permits, stamped drawings, etc.). Approval of the MDP also includes reviewing section 106 of the National Historic Preservation Act for possible recommendations.

It is quite remarkable that POWDR is requesting fast-tracking of the review and approval of the MDP without having gone through a respectful public process. Further, public agencies do not review Section 106 of the National Historic Preservation Act (NHPA) as stated above “for possible recommendations.” Public agencies are required under Section 106 to conduct a legal process in which the SHPO, Indian Tribes and the interested public are consulted regarding potential effects on historic and cultural properties with efforts made to see them preserved. This is an important distinction, and carries out the spirit and purpose of the law as eloquently written:

“The Congress finds and declares -

1. the spirit and direction of the Nation are founded upon and reflected in its historic heritage;
2. the historical and cultural foundations of the Nation should be preserved as a living part of our community life and development in order to give a sense of orientation to the American people;
3. historic properties significant to the Nation’s heritage are being lost or substantially altered, often inadvertently, with increasing frequency;
4. the preservation of this irreplaceable heritage is in the public interest so its vital legacy of cultural, educational, aesthetic, inspirational, economic, and energy benefits will be maintained and enriched for future generations of Americans”

We are now a year-and-a half after concurrence on the DoE; further we learned on October 4, 2022 at the public hearing in Seeley Lake that the Flathead Forest received a preliminary MDP from the applicants a year ago in October 2021. Yet here we are many months later and, despite devastating impacts to the historic resources at Holland Lake Lodge, there is still no Determination of Effects, defined Area of Potential Effects, engagement of Consulting Parties, and Public Comment process as required under NHPA Subpart B – The Section 106 Process.

Posting POWDR’s MDP and the DoE on the Forest Service website is not a substitute for consultation under Section 106. While the law does allow for agencies to coordinate with other reviews such as NEPA, in this case, that coordination is lacking and the inadequacy of the agency’s public comment process under the guise of a CE, does not “provide adequate opportunities for public involvement consistent with this subpart” as required under 36 CFR § 800.2(d), especially when the Determination of Effects and APE have yet to be defined. Nor does it in any way meet the Section 106 legal requirements for Tribal Consultation.

The MDP discussion of Historic Preservation and Mitigation is inadequate and does not fulfill Section 106 review requirements under the NHPA: With all due respect, adopting the Adirondack Style for planned new buildings as described [MDP 6.0] is not historic preservation. And the ensuing discussion of planned demolition [MDP 6.1] is limited to a woeful three sentences; to which we respond:

“Holland Lake Lodge has been a popular destination for visitors and the local communities since the early 1900’s, but the existing infrastructure and buildings are tired and in poor condition.”

Holland Lake Lodge is an iconic venue that derives much historic value from its popularity with the public, and its connection to many thousands of Montanans over multiple generations. If this property has not been better maintained over the years by Mr. Wohlfeil and HLL that is indeed unfortunate. Common historic preservation practices and numerous grants, tax credits and incentives could readily be applied for to update this property, enabling buildings to be refurbished and updated to modern comfort. At PMT, we routinely assist owners and communities in successfully funding and carrying out preservation projects. There is no reason this could not happen but it appears HLL have not tried.

“There is a need to replace the cabins and accessory buildings to meet accessible and building code standards, and to provide guests with comfortable accommodations that allow for a viable business.”

There is no evidence in the MDP of an historic architect having been engaged on the development of this MDP. Nowhere do we see any effort to explore options for compliance with the Americans with Disabilities Act and International Existing Building Code standards, or adaptive reuse alternatives that would preserve the historic complex as part of a long-term management and business plan. For a property of such strong integrity and statewide historic significance, alternatives to demolition must be thoroughly considered.

The development proposed in this MDP will inevitably change the look and feel of the permit area, however, our design approach aims to retain the fundamental character of Holland Lake Lodge.

We agree that this development will have enormous detrimental impacts to the property, however, the conclusion that this design approach will “retain the fundamental character of the Holland Lake Lodge” is patently false. Rather, the proposed design destroys most all that was authentic and historic on the property; there will be little remaining of what was once Holland Lake Lodge.

And finally, on the subject of mitigation the MDP offers: *“Given some history will be lost by removing old buildings on public land we propose the following mitigation strategies:”*

That is a quaint way to put it. Absolutely some history will be lost through a project that will obliterate most of the historic buildings and dramatically intensify the density of buildings, volume of use, and transportation patterns within the site. There is no question that impacts of the plan as proposed, on a scale that triples the size and occupancy of a quiet, vintage lodge nestled against the foot of the Bob Marshall Wilderness within a 10+acre permit area, will cause significant harm to the natural and human environment of Holland Lake, including its historical values.

This MDP proposes mitigative measures prior to having a Determination of Effect or a defined Area of Potential Effect for this project. It puts the cart before the horse to discuss any mitigation, without Section 106 consultation with the Tribes and the Public. There are values and resources such as historic trails and likely other resources that have yet to be researched, recorded and evaluated. A proper Class I literature search and a Class 3 intensive cultural resources inventory of the APE must be conducted for this historic property, along with Tribal Consultation and consideration of any potential impacts to Native American and Traditional Cultural Properties. It is premature to propose mitigative strategies before knowing what all is there, carefully evaluating what the impacts will be, and the Area of Potential Effect in which they will be evident.

Need for Further Analysis: Increased overnight guest capacity as described [MDP 4.2] will triple from 50 to 156. The fact that site plans from 1935 and 1992 included more buildings onsite is a moot point for this permit. Those plans failed to materialize. The fact that expansion was considered 30 or 90 years ago does not somehow magically now, as the MDP seems to suggest, justify the intent to demolish most all of what Holland Lake Lodge is, to pave the way for a high-end resort. And while the applicants are quick to assure the public they will always be welcome at the lodge, there is no economic analysis to show how the projected costs and their expected return-on-investment will factor into the cost of an overnight stay at the Bob Marshall Lodge or a meal at the Mission Mountain Restaurant.

Page 36 of the DoE features a beautiful photograph of the Lodge in the late 1940s, and also notes:

“... the commemorative plaque was erected on the shore of the lake in either 2015 or 2016. The plaque was installed to commemorate the efforts of the Wyss Foundation, Trust for Public Land (TPL), nonprofit partners, private conservation funders, and Swan Valley residents in protecting forestland within the Swan Valley from timber production and development (Kauffman 2011)”

Once upon a time, Mr. Wohlfeil joined with many environmentally-conscious people who supported protection of the Swan Valley and its exceptional environment. If POWDR and HLL today are sincere in their public statements that Holland Lake Lodge is “a soulful place” and that it is their intent “to preserve the integrity of what is here” then we appeal to the Forest Service to take them at their word.

Deny their request for a new special-use permit and send this MDP back to the drawing boards. Ask the applicants to conduct a proper evaluation of all the impacts their plans for development will bring to Holland Lake and the much-loved historic Holland Lake Lodge.

If they truly care about what is at stake here, and what it means to the people of Montana, POWDR and HLL must be willing to engage historic preservation and wildlife specialists to determine the appropriate carrying capacity for this sensitive place. They must also explore a full range of alternatives with potential to preserve one of Montana’s most iconic recreational properties, with a goal to preserve the lodge, and protect the lake and all the wildlife that depend on it, now and long into the future.

We close with the request that this letter also serve as our formal request to serve as a consulting party for purposes of Section 106 review when public consultation is meaningfully initiated on the Holland Lake Lodge project. Thank you for the opportunity to have our comments considered and added to the public record.

Sincerely,



Chere Jiusto
Executive Director

cc: Pete Brown, Montana State Historic Preservation Officer