

October 6, 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>

Supervisor Kurt Steele and Project Lead Shelli Mavor,

Please accept and consider these comments concerning the Holland Lake Lodge Expansion. I currently live year-round in Hamilton, Montana. Up until four years ago, I spent summers here in Montana and winters in Park City, Utah where I experienced POWDR first hand. A few years ago, I served on the Governor's Grizzly Council. Though I do not speak for the Council, I did learn quite a bit about grizzly bears and how recreation affects them. I am concerned that the proposed expansion will negatively affect grizzly bears among other endangered and sensitive species. And judging from the nearly 6000 comments received thus far, it seems that the expansion is not in the best interest of the general public either.

To use a Categorical Exclusion (CE) for a project of this magnitude is just wrong, plain and simple. CEs are meant to be used for small projects that would cause very little or no harm to the environment. This proposal includes a 3000 square foot restaurant, increasing lodge capacity by three times, a gift shop, housing for 12 year-round employees, 5 recreation vehicle hookups for summer employees, 24 new cabins, a new water treatment plant, and more. It does not even remotely qualify for a CE. This will create a visual, environmental, and experiential impact.

An Environmental Impact Statement (EIS) is required for a project that will greatly affect the human environment and the resources that the general public enjoys. The EIS must include and analyze a full range of alternatives. The public should have the opportunity to weigh in on a full range of different options available for this permit area. One example might be to expand the campground and use the lodge as a visitor center touting the history of the area and Holland Lake Lodge.

An EIS must be prepared and a CE or Environmental Assessment (EA) excluded due to myriad extraordinary circumstances. The increase in user days created by this expansion and winterization of lodge and facilities will extend effects well beyond the permit area. The area provides habitat for grizzly bears, Canada lynx, wolverine, bull trout and loons as well as many other sensitive species.

The lodge sits on the edge of the Bob Marshall Wilderness. It serves as connectivity between the Wilderness and the Mission Mountains. The proposal claims few grizzlies have been seen in the area but this does not mean they are not there. A recent editorial by Christian Wohlfeil mentions an 800-pound grizzly that joined a wedding celebration at the lodge. Grizzlies often move under cover of darkness, early dawn, and dusk. Not being seen does not mean they do not frequent the area. Grizzlies are sensitive to roads and road use. Mace et al 1996 studied grizzly bear reaction to roads in the Swan Valley and found, "Most grizzly bears exhibited either neutral or positive selection for buffers surrounding closed roads and roads receiving <10 vehicles per day but avoided buffers surrounding roads having >10 vehicles per day. 5. Between 1988 and 1994, eight grizzly bears were killed by humans. These deaths were directly influenced by road access and unnatural food sources. (Mace et al 1996, Relationships Among Grizzly Bears, Roads and Habitat in the Swan Mountains Montana. <https://www.jstor.org/stable/2404779>) The expansion will have a direct effect on grizzly bears by increasing the amount of unnatural food sources, traffic on the roads, and human use of their winter habitat.

Though POWDR has assured the public "there are no helicopters," they do not tell us what exactly they do have in mind. Since POWDR does own a few helicopter skiing operations, one would guess they will go in that direction or attract those interested in such an "adventure vacation." Whether POWDR owns the operation or not, helicopter skiing is an activity their clients expect and the industry will grow with POWDR at Holland Lake. Crupi et al (attachment 1) found that low flying helicopters disrupt grizzly denning. A typical heli skiing day would include multiple landings to drop off and pick up skiers. For example, the Powderbirds (owned by POWDR) advertise 6-8 runs per day which would require 12-14 landings per day.

Canada lynx and wolverine presence has been verified in the area. These species are also sensitive to habitat fragmentation and human activity. Fisher et al 2021 found, "conservation strategies should encompass landscape protection from intensive development and human activity, restoring and maintaining connectivity of high-quality habitat, and climate change mitigation. (Attachment 2, p 14)" Canada lynx rely on deep snows and snowshoe hares to survive. According to a survey of by University of Freiburg, lynx preferred "heterogeneous forest areas and areas that provided protection from human disturbance." (University of Freiburg. "Human disturbance is the most crucial factor for lynx in habitat selection." ScienceDaily. ScienceDaily, 28 January 2022. [www.sciencedaily.com/releases/2022/01/220128141305.htm](http://www.sciencedaily.com/releases/2022/01/220128141305.htm))

Loons nest on Holland Lake. According to Montana Loon Society, "in Montana, where good loon lakes are more finite, a large number of singles disrupt nesting by picking fights with resident loons, to the point that chick numbers drop." It seems important that all loon nesting areas be preserved. How will a restaurant on the lakeshore affect these loons? How will the water adventures (motorized or not) affect their nesting habits? Loons are protected by the Migratory Bird Act. Bald eagles also frequent the lake and they are protected by the Bald and Golden Eagle

Protection Act. How will increased human activities and capacity affect their migration and habitat.

Bull trout are also endangered and a unique species of bull trout live in the lake and Holland Creek, which is considered critical habitat. It is a small, unique population. If they are wiped out due to increased use and construction near the lake, there will be no other trout to fill the niche left empty. How will increased ground water use affect the lake level and creek level?

Holland Lake is considered in the National Registry of Historic Places. How should these structures be protected under that law? The plan is to raze the cabins and gift shop that are part of this registry. How does this designation affect the Master Development Plan (MDP).

Year-round use of the lodge will impact the Forest Service and county roads that provide access. They will need to be maintained and plowed to allow winter access at taxpayer expense. Adventure can be dangerous. How will the adventure clientele be rescued and cared for should an accident occur. Who will pay for this and who will risk their lives to rescue POWDR's adventure patrons?

How will this expansion affect visual quality of the area. The proposal calls for a 3000 square foot restaurant on a once pristine lakeshore. How will the construction over the next 2-3 years affect the campers in the campground next door? How will the noise affect hikers and quiet lake users? How will the lights of the larger structures and parking lots affect them? Even with all the lights directed down to protect the night skies, the sheer number of lights will affect ambient light and campers next door. There are also gates mapped in the proposal. Gates should not be allowed on public lands especially if they discourage public use as these would.

I have commented on a number of recreation special use permits (SUP) on the Flathead that were approved with CEs. A CE does not require analysis of cumulative effects. There have been so many SUPs under CEs that it is time to take all the permits and recreation in the area and analyze their cumulative effects in an EIS. Like the frog in a pot of slowly heating water, small increments add up to a slow boil before one realizes the danger. It is time to take a temperature reading.

In that EIS of recreation and SUPs on the Flathead, please analyze use and future needs of recreational facilities on public lands in the different bear management units (BMU) for the next ten years. Holland Lake is in a Bear Management Unit (BMU). According to the Forest Plan, only one facility can be expanded every ten years in a BMU. Is this Holland Lake proposal the best choice and in the best interest of the general public? Is there more need for expansion of another facility?

The outfitter permits out of Holland Lake Lodge have expired. Has POWDR or any of their subsidiaries applied for permits? This information should be available to the public. It is strange that a huge investment is being made without a specific plan for the future. A large corporation like POWDR would not make this investment without a long-term business plan. I find it disingenuous at best not to share the future plan of this expansion.

According to their website, Powerbirds charge “Early Bird Pricing **\$6,450 (regular season); \$7,500 (peak season) through Sept. 1 2022.** Includes complimentary breakfast, snacks & après ski lunch, 2 helicopter guides, 6-10 helicopter runs (extra flight time is available upon request and is billed by the tenth of the hour at \$6,000 per flight hour).” This is well out of the affordable range of the general public. The expansion should not go through without a 20-year plan from POWDR complete with proposed pricing. The public deserves this information to make substantive comments concerning the use of their public lands. They should be told if they will be priced out of a special place in Montana.

POWDR’s subsidiary Powderbirds has a permit to fly in the Wasatch Mountains. They land right next to Wilderness and skiers ski through Wilderness and are pickup at the bottom of a drainage outside of Wilderness. This has a huge effect on Wilderness. I have hiked to Wilderness areas only to hear helicopters flying back and forth dropping off and picking up skiers. It takes away from quiet solitude. The Powderbirds seem to enjoy special privileges from the Forest Service in charge of their permit. They have a ten-year permit in the Wasatch and the second to last time they renewed their permit, there was so much push back from backcountry skiers that they had to offer a concession to keep the permit. They promised to announce where they would be each day so skiers could avoid them. Each day, they list every drainage in the Wasatch, so the concession backfired for the skiers. The next time they renewed, the FS quietly announced the renewal comment period a year early. A group of backcountry skiers heard about it and passed the word around. There were fewer comments yet 85% of the comments were against this renewal without more stringent concessions. The FS renewed the permit with no changes. I worry at this power the POWDR seems to have with a federal agency and worry that the Holland Lake Lodge expansion going through with a CE is another example of this.

Finally, it seems this permit is being transferred/sold which is illegal. POWDR can purchase the buildings, but they cannot purchase the permit. I am concerned about amendments #1 and #2 to the permit that have already been approved on August 22, 2022. One transfers control of the permit to POWDR allowing a Holland Lake Lodge Inc. representative to sign permit applications and is co-signed by Brian Stewart (listed in the MDP as Primary Contract, 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. Flathead Forest is obligated to revoke these amendments and begin the process for a new permit for POWDR.

It is disconcerting that two wells included in the MDP have also been approved under an Amendment before scoping began. This was done without public process. How is this in the public interest? The Forest Service Supervisor is not obligated to issue a permit to the person that purchases buildings and improvements. In fact, the supervisor should end this permit and begin analysis for a new permit.

At a recent meeting Kurt Steele confessed that the original permit includes only 10 acres, not the 15 acres he had assumed. He also said that the new water treatment system increases the footprint of the permit to just under 20 acres. This nearly doubles the permit area. This whole process needs to stop, start over and begin analysis of a new permit for POWDR in an EIS.

I urge you to reject this proposal and demand POWDR apply for a new special use permit as dictated by law and analyze effects in an EIS. Analyze the area in the BMU and assess what expansion is most warranted to serve the interest of the general public over the next ten years. And before any decision is made, an EIS analyzing the effects of the substantial recreation program and SUPs on the forest must be completed. Or better yet, end the permit and make the lodge a visitor center educating the public about the amazing array of wildlife that has lived in the area since Lewis and Clark first visited Montana.

Thanks for the opportunity to comment.

Sincerely,

A handwritten signature in cursive script that reads "Michele Dieterich". The signature is written in black ink and is positioned above the printed name.

Michele Dieterichs