

Kurt Steele, Forest Supervisor
Flathead National Forest
650 Wolfpack Way
Kalispell, MT 59901

Sent via the internet: <https://www.fs.usda.gov/project/?project=61746> and via email to:
michele.mavor@usda.gov

Dear Supervisor Steele:

These comments are provided in response to the scoping letter on the proposed expansion of facilities associated with the Holland Lake Lodge on the Flathead National Forest.

We have concerns with the proposed resort expansion including the potential impacts on the Bob Marshall Wilderness, adjacent wildlands and the wildlife that live there, as well as more general concerns about the proposal to transform the area around Holland Lake into a major resort destination. We've reviewed the comments of Friends of the Wild Swan, Swan View Coalition, Flathead-Lolo-Bitterroot Citizen Task Force, and Marty Almquist, retired Forest Service special uses administrator and wilderness ranger and share many of the same concerns they've raised.

The proposed expansion is projected to bring an additional 35,000 visitor days to the resort and to expand the season to year-round use. POWDR touts itself as an all-inclusive outdoor adventure company, including a major heli-skiing operation, so it will likely be promoting and marketing the area for hiking, horseback riding, trail running, mountain biking, angling, and potentially heli-skiing, heli-hiking, flightseeing, snowmobiling, and other high-impact activities that will displace wildlife and destroy the quiet solitude currently found on these lands.

Increasing the footprint of the lodge, tripling the number of visitors to the lodge, expanding it to a year-round resort, and flooding the surrounding wildlands with more people engaging in a greater number of impacting activities will greatly change the character of the area and undoubtedly harm grizzlies, lynx, bull trout, and other threatened, endangered, or at-risk species.

The scoping letter makes little or no mention of how the proposed expansion could affect the surrounding national forest lands, including the Bob Marshall Wilderness and adjacent potential wilderness lands. Holland Lake is a major access point into the "Bob" and even though the land between the trailhead and Swan Crest isn't designated, for visitors it's part of the wilderness trip. Expanding the lodge and promoting recreation in the area will undoubtedly make the area more crowded. Moreover, the new owners of the lodge are touting the potential to "[p]artner with local guides and outfitters to offer guests more activities." All of this will come at the expense of other users and the wildlife for whom this place is home (<https://www.hollandlakefuture.com>).



Touting the potential for helicopter-based activities was part of the package for selling the Holland Lake Lodge. This photo captured from the real estate ad marketing the Holland Lake Lodge.

Promises made that the nearby Swan Range or Mission Mountains won't be used for heli-skiing or heli-hiking operations ring hollow when the resort was marketed by its current owner as offering a helipad, and the company that is buying into the operation owns a heliskiing business. The ability to land a float plane on Holland Lake was also a sales pitch when marketing the resort.

The proposed expansion at Holland Lake will almost certainly lead to more aircraft use in the area including clients arriving by air directly to the resort or the nearby Condon airport. It also raises the potential for scenic overflights over the Bob Marshall, Scapegoat, and Mission Mountains Wildernesses, an activity that the Forest Service may have no way to regulate or control. As the current lodge owner promoted in his real estate ad:

“There is limitless potential for development & expansion of a thriving guest lodge, retreat center and year-round resort... Ability to land helicopter on property & floatplane on lake, right in front of property, as well as a landing strip in Condon.”

Even if POWDR doesn't bring their Powerderbird choppers with them, or use the on-site helipad, POWDR will be well-positioned to work with other companies to provide the lodge's clientele with helicopter-assisted skiing or hiking adventures, or heli and fixed-wing aerial tours of the Bob, Scapegoat, and Missions by using the airfield in Condon.

Given the enormity of the changes this project is likely to bring to Holland Lake and the surrounding area the Forest Service should reject it out-of-hand. It's the wrong project in the wrong place. Should the Forest Service decide to continue to assess the proposal it should do so in an environmental impact statement that looks at the entirety of the potential impacts to fish,

wildlife, Wilderness, and the social impacts to the current residents and visitors to the area. The recent public meetings in Condon and Seeley Lake, and the numerous opinions and editorials in local media should serve as a strong message that the public doesn't support what the POWDR Corporation wants to do at Holland Lake and on our public lands. The Forest Service should heed that message.

Sincerely,

A handwritten signature in black ink, appearing to read "George Nickas". The signature is written in a cursive style with a large initial "G".

George Nickas
Executive Director