

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

Re: Holland Lake Lodge

Mr. Steele - I have been a professional archaeologist and cultural resources project manager in Montana for over 42 years. My wife and I have also used and enjoyed the camp sites around Holland Lake, as well as kayaking on the lake.

I am quite concerned about the known and potentially undiscovered cultural resources on the Flathead National Forest lands occupied by Holland Lake Lodge, as well as the additional areas proposed for disturbance.

I have reviewed the available cultural resources site form and report for above ground cultural resources at Holland Lake Lodge. I was disappointed to discover that an intensive, pedestrian cultural resources inventory has not been required by the forest Service as part of any pre-disturbance documentation. As your cultural resources personnel should be aware, any intensive inventory would include subsurface testing for both historic and precontact cultural material.

Also, as pointed out in the comment letter submitted from Chere Justo of Preserve Montana, the Forest Service has apparently not completed any required government to government consultation with the Native American Tribes who traditionally used the area and may still use the Holland Lake area as part of their treaty rights with the United States. Such consultation could potentially identify traditional cultural properties or practices or other concerns the Tribes might have for the proposed undertaking.

While the out of state consultants (North Wind) hired by Christian Wohlfeil of Holland Lake Lodge, Inc., recommended the Holland Lake Lodge District as eligible for the National Register of Historic Places under Criterion A "for its association with remote recreational ranch properties, also known as "dude ranches," constructed in the early- to mid-twentieth century," potential mitigation measures were not recommended. While no mention is made in the report of North Wind having a cultural resources Special Use Permit, it is hoped that they held one prior to fieldwork.

Recently it has come to light that the development plan proposed by the developer POWDR after they complete purchase of the property exceeds the current Flathead National Forest Special Use Permit area. It should also be pointed out that North Wind indicates the current area occupied and permitted by Holland Lake Lodge is both 13.9 acres (Pages iii, 10, 23) and 10.5 acres (Page 9). Hence, the area of potential effects needs to be defined by the Flathead national Forest in consultation with the Montana State Historic Preservation Officer. Such consultation may also need to involve Tribes and other interested parties.

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