

Introduction

I am writing in opposition to the proposal for a special-use permit for the Holland Lake Lodge by POWDR. It goes against the bedrock values of the Swan Valley communities, long-time Montana residents, the history of the Holland Lake Lodge, and the mission of the United States Forest Service. In addition, no matter the decision after this process, we all must acknowledge the history and sacredness of the Swan-Seeley corridor belonging to the rightful owners of this beautiful valley – the Kootenai, Salish, and Pend d'Oreille tribes.

A Holistic Approach to Management & Decision-Making

The decision-making process requires critical, holistic thinking with all stakeholders and common interests involved in this process to come up with the best outcome for future generations. Initially, what the Flathead Service and POWDR proposed was caught off guard by thousands of stakeholders who have a deep interest in the future of Holland Lake and the communities that will feel the impacts directly. Before proceeding with the expansion or any project proposal regarding this area, it shall happen with the lens of holistic management to maximize valuable feedback from diverse backgrounds and perspectives. Holistic management is a decision-making process that gives people the insights and management tools needed to understand nature, ecology, agriculture, economics, and social issues. Whatever happens with Holland Lake Lodge, the stakeholders shall define it with a clear mission, vision, and core values for all parties involved to understand the bigger picture of what is at stake.

The Forest Service's Mission, Vision, & Guiding Principles

The Flathead National Forest needs to communicate to all stakeholders about the importance of the Forest Service's mission statement, "*The mission of the USDA Forest Service is to sustain the health, diversity, and productivity of the Nation's forests and grasslands to meet the needs of present and future generations.*" The Forest Service must uphold that statement through the work and relationships with its partners. To give vision to what the Forest is supposed to do for all parties is to be guided by core principles, and it does not steer off course and cause harm.

The phrase, "Caring for the Land and Serving People," steers the Forest Service mission to its management practices, and it includes the following:

- *Advocating a conservation ethic in promoting the health, productivity, diversity, and beauty of forests and associated lands.*
- *Listening to people and responding to their diverse needs in making decisions.*
- *Protecting and managing the National Forests and Grasslands so they best demonstrate the sustainable multiple-use management concept.*
- *Providing technical and financial assistance to State and private forest landowners, encouraging them to practice good stewardship and quality land management in meeting their specific objectives.*

- *Providing technical and financial assistance to cities and communities to improve their natural environment by planting trees and caring for their forests.*
- *Providing international technical assistance and scientific exchanges to sustain and enhance global resources and to encourage quality land management.*
- *Helping States and communities to wisely use the forests to promote rural economic development and a quality rural environment.*
- *Developing and providing scientific and technical knowledge aimed at improving our capability to protect, manage, and use forests and rangelands.*
- *Providing work, training, and education to the unemployed, underemployed, elderly, youth, and disadvantaged in pursuit of our mission.*

Vision

- *We are recognized nationally and internationally as a leader in caring for the land and serving people.*
- *We are a multicultural and diverse organization.*
- *Employees work in a caring and nurturing environment where leadership is shared.*
- *All employees are respected, accepted, and appreciated for their unique and important contributions to the mission.*
- *The work is interesting, challenging, rewarding, and fun -- more than just a job!*
- *We are an efficient and productive organization that excels in achieving its mission.*
- *Responsibility and accountability for excellence are shared by employees and partners.*
- *The American people can count on the Forest Service to perform.*

Guiding Principles

To realize our mission and vision, we follow these 13 guiding principles:

- *We use an ecological approach to the multiple-use management of the National Forests and Grasslands.*
- *We use the best scientific knowledge in making decisions and selecting the most appropriate technologies in the management of resources.*
- *We are good neighbors who respect private property rights.*
- *We strive for quality and excellence in everything we do and are sensitive to the effects of our decisions on people and resources.*
- *We strive to meet the needs of our customers in fair, friendly, and open ways.*
- *We form partnerships to achieve shared goals.*
- *We promote grassroots participation in our decisions and activities.*
- *We value and trust one another and share leadership.*
- *We value a multicultural organization as essential to our success.*
- *We maintain high professional and ethical standards.*
- *We are responsible and accountable for what we do.*

- *We recognize and accept that some conflict is natural and we strive to deal with it professionally.*
- *We follow laws, regulations, executive direction, and congressional intent.*

Special-Permit Use & Authority to Reject

From my observations, this proposal has failed to do a comprehensive analysis inclusive of all stakeholders involved. Frameworks such as holistic management and thinking can solve complex problems. Let's remind ourselves that the public has a right to be involved in this decision-making process because the Holland Lake Lodge sits on public land. That element has to be considered with mutual respect and the intentions of the special permit. The Forest Service must follow the guiding purpose of the special permit application, "*The purpose of the permit is to 'benefit the general public and protect public and natural resource values'*" (36CFR§251.54). Therefore, if the proposed activity does not meet certain criteria under §251.54 with strict guidance, then the Flathead Forest Service has the right to reject the proposal by POWDR and Christian Wohlfeil.

Conclusion & Recommendations

What POWDR and Mr. Wohlfeil propose for the Holland Lake Lodge expansion project does not reflect the mission statement of the United States Forest Service nor the guiding principles of the special-use permit. Their intentions for the special-use permit are to make a profit rather than for the enjoyment for the public. Numerous environmental, economic, and social concerns affect many areas and populations. Some of these include the rest of the Holland Lake Recreation Area, the surrounding pristine areas such as the Bob Marshall Wilderness Complex, and the small, rural communities in the Swan Valley that will feel most pressured by this development proposal. In conclusion, I suggest the Flathead National Forest consider any of these routes for the decision-making process:

- Freeze the application for review on the proposal's intent and whether it's appropriate based on the special-permit rules and the Forest Service's guiding principles.
- Review on Christian Wohlfeil's standing on his neglect to make improvements to the property and being a poor steward of the property.
- Conduct an environmental impact analysis to determine if any endangered wildlife species are threatened by the proposal.
- Adopt more holistic management and thinking framework to guide all stakeholders during the decision-making process.
- Deny the proposal outright to reconsider the appropriate use for the Holland Lake Lodge property so the public can make a more holistic decision for the property.
- Extend the public comment period for more members of the public to engage in the decision-making process.

- Host in-person and online events to allow the public to provide feedback and suggestions on how the property should be utilized for future generations.
- Invite members from the Indigenous tribes of the Kootenai, Salish, and Pend d'Oreille tribes to be a part of the decision-making process for respecting the cultural history and importance of the Swan Valley and Holland Lake to these tribes.

Regards,

Zach Nell