### Kurtis Steele, Forest Supervisor;

### Shelli Mavor, Project Lead

### Flathead National Forest

### Forest Supervisor Mr. Steele and Ms. Mavor,

In response to the extended comment period, please accept the following comments on the proposed Holland Lake Lodge Special-Use Permit expansion for Christian Wohlfeil and ski resort company POWDR.

This proposal has been identified to be analyzed under a categorical exclusion under NEPA, based on 36 CFR 220.6(e)(22). This categorical exclusion was intended for small projects such as:

(i) Constructing, reconstructing, or expanding a toilet or shower facility;

(ii) Constructing or reconstructing a fishing pier, wildlife viewing platform, dock, or other constructed feature at a recreation site;

(iii) Installing or reconstructing a water or waste disposal system;

(iv) Constructing or reconstructing campsites;

(v) Disposal of facilities at a recreation site;

(vi) Constructing or reconstructing a boat landing;

(vii) Replacing a chair lift at a ski area;

(viii) Constructing or reconstructing a parking area or trailhead; and

(ix) Reconstructing or expanding a recreation rental cabin.

Some desired expansion items are included in the large-scale scoping proposal, they are not stand alone and are tied to a full-scale expansion of the entire Holland Lake Lodge complex. Building a restaurant, new lodge, more cabins and other facilities do not fit into a categorical exclusion. The proposal does not mention the extraordinary circumstances that are related to this proposed action. Resource conditions that should be considered in determining whether extraordinary circumstances related to a proposed action warrant further analysis and documentation in an EA or an EIS are: Federally listed threatened or endangered species or designated critical habitat, species proposed for Federal listing or proposed critical habitat, or Forest Service sensitive species. [36 CFR 220.6(b)(1)(i)]

The Holland Lake Lodge and other authorized improvements are operated through a Resort/Marina Special Use Permit to offer concessions on Forest Service lands. The purpose of that permit is to “benefit the general public and protect public and natural resource values.” POWDR’s proposed “improvements “do not meet that definition. (36 CFR § 251.54) “An authorized officer shall reject any proposal, including a proposal for commercial group uses, if, upon further consideration, the officer determines that: (i) The proposed use would be inconsistent or incompatible with the purposes for which the lands are managed, or with other uses; or (ii) The proposed use would not be in the public interest.”

Further, POWDR is referred to as the “joint venture partner” with Holland Lake Lodge Permittee, Christian Wohlfeil. Under the Resort Permit, page 3, J.1: The holder shall notify the authorized officer when a change in control of the business entity that holds this permit is contemplated.

J.1.b: In the case of a partnership, limited partnership, **joint venture,** or individual entrepreneurship, control is a beneficial ownership of or interest in the entity or its capital so as to permit the exercise of managerial authority over the actions and operations of the entity."

J.2. states: Any change in control of the business entity as defined in clause J.1 shall result in termination of this permit. The party acquiring control must submit an application for a special use permit.

In the Flathead National Forest Plan; Chapter 3. Management Area Direction:

Holland Lake Resort and adjoining campground fall under administrative and special use management areas, 3a and 3b. Sites will be developed and maintained as sustainable, economical and cost effective. Standards include: are compatible with the recreation opportunity spectrum; and will meet grizzly bear, lynx, wolverine, and bull trout guidelines.

### The forested landscape surrounding Holland Lake is designated a “primary conservation area” for grizzly bears in the Northern Continental Divide Ecosystem. The Swan-Mission Valley is a critical linkage corridor, providing connectivity for bears and other threatened wildlife throughout the valley and from the Bob Marshall Wilderness complex to isolated landscapes in the Mission Mountain Wilderness and the Rattlesnake Wilderness. This integrity must be preserved.

### Holland Lake and Holland Creek are occupied by a “disjunct population” of bull trout and is designated bull trout critical habitat. Bull trout use Holland Creek to spawn. They mature in Holland Lake several years before returning to the creek to spawn again. Holland Lake and Holland Creek bull trout do not access the Swan River ecosystem.

### These bull trout have a life cycle similar to the disjunct Lindbergh Lake population on the Mission Mountains (west) side of the Swan-Mission valley.

In the Flathead National Forest Plan, under Scenic Guidelines:

01. To ensure consistency with the desired scenic character of the Forest and with the historical and cultural influences of the broader area, the construction or reconstruction of Forest Service facilities (recreation, fire, administrative, and other) and permitted facilities should be consistent with the Built Environment Image Guide.

02. To be consistent with the Forest’s scenic integrity objectives, deviations that are visible in some areas of the Forest should generally be subordinate to the surrounding landscape and should diminish over time.

I have attached two documents; the Region 1 Wild Niche and the Flathead Forest Niche. Taking these desired descriptions for the Forest and Region along with policy, permit, and Forest Plan direction cumulatively; analysis for this proposal requires an EIS. My discussion above does not include water quality assessment and pristine standards existing in this lake being kept. I wish to see that component addressed.

In summary, the proposed analysis for the Holland Lake expansion proposal is not transparent and has been presented for an inappropriate review process. It appears that the desired decision reflects allowance for access and unlimited human use growth at any environmental and landscape cost. Before any such proposal is even considered, alone being analyzed, the FNF should concentrate on implementing recreation, visitor and infrastructure management already in place across the Forest.

Thank you for this opportunity to provide comment,

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Cc : Region 1 Forester Leanne Martin

Senator John Tester

### Sent via: https://www.fs.usda.gov/project/?project=61746