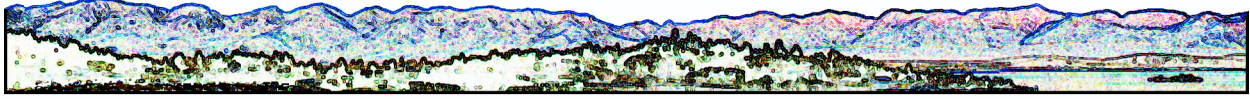


Swan View Coalition

Nature and Human Nature on the Same Path



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April 11, 2025

Anthony Botello
Flathead Forest Supervisor
650 Wolfpack Way
Kalispell, MT 59901

Submitted via the CARA portal, once it starts working again,
and anthony.botello@usda.gov , Christopher.Dowling@usda.gov ,
gary.blazejewski@usda.gov

Re: Holland Lake Lodge Special Use Permit Issuance Proposal

Dear Supervisor Botello and others;

We ask that you restart the public comment period in the above matter once you have provided the public with the necessary proposal details. Until then, the public is not able to make fully informed comments. At a minimum, the information that must be made available on the online project page includes:

1. Holland Peak LLC's application for the permit.
2. Holland Peak LLC's proposed Operating Plan, which is required for the issuance of a Special Use Permit.
3. A copy of the proposed Special Use Permit and its terms and conditions along with all referenced exhibits and attachments.
4. All documents relative to the wastewater system and sewage lagoon relied upon and shared between the Lodge and the Holland Lake Campground, the testing of those systems, the results of those tests, and the proposed remedies to problems found.
5. All documents clarifying the discrepancy in the size of the SUP area, which in the past has been described as 10.53 acres, 15 acres and some 30 acres if the wastewater lagoon, piping and sprinkler system is included.
6. All documents concerning that status of the 8/22/22 Amendment #2 to the Wohlfeil SUP, authorizing the drilling of "two new wells behind the existing storage shed," and whether those wells have been drilled and/or put into use.

7. A posting of all comments submitted online must be shown in the project Reading Room, which was not happening as of yesterday

Simply posting the 2017 Wohlfeil SUP online is inadequate and simply distracts from the focus on what is being proposed. Moreover, the 2017 SUP posted on the online project page does not include all of the referenced appendices.

Once all information relevant to this proposal has been posted on the online project page, please then initiate a scoping process for the preparation of an EA in order to adequately assess the impacts of cumulative and connected actions and determine whether an EIS is required.

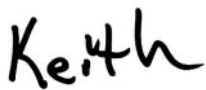
Your proposed use of a Categorical Exclusion violates the National Environmental Policy Act by unlawfully sectioning the cumulative and connected actions that include, but are not necessarily limited to, the issuance of the proposed SUP to Holland Peak LLC, the repair and maintenance of the wastewater sewage lagoon/system, and any outfitted or guided activities that may be staged at or engaged by the Lodge for its clients.

The previous proposal to greatly expand the Lodge facilities offered opportunities for the Forest Service to learn from its missteps and to identify numerous issues with the existing lodge, existing wastewater facilities, and potential increases in recreational impacts to fish, wildlife, other resources, and people. Those issues are not negated by the current scaled-down proposal, nor is public faith restored when the new SUP applicant chooses not to discuss the details of its application. (See, for example, <https://flatheadbeacon.com/2025/04/09/as-new-owners-await-approval-to-buy-historic-holland-lake-lodge-flathead-forest-triggers-permit-review/>).

And it is certainly a pity to see the Forest Service once again put the wrong foot forward by downplaying the impacts and scope of the proposal in order to once again attempt to authorize the SUP with a Categorical Exclusion, while shielding pertinent information from public view during the public comment period.

Please start over, as described above.

Sincerely,

A handwritten signature in black ink that reads "Keith".

Keith J. Hammer
Chair

Ps – We were able to access the online project page yesterday but found no link to the project Reading Room. We have not been able to access the online project page in the past couple of hours, so are unable to submit these comments there via the Comment/CARA link.