



April 29, 2025

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

Re: Holland Lake Lodge Special Use Permit Issuance Proposal

Submitted electronically via: <https://cara.fs2c.usda.gov/Public//CommentInput?Project=67937>

Dear Supervisor Botello,

Please accept these comments on behalf of Wild Montana (formerly Montana Wilderness Association) and our members in response to the public comment period for the Holland Lake Lodge Special Use Permit Proposal.

I. Organizational Background

Since 1958, Wild Montana has been uniting and mobilizing people across Montana, creating and growing a conservation movement around a shared love of wild public lands and waters. We work at the local level, building trust, fostering collaboration, and forging agreements for protecting the wild, enhancing public land access, and helping communities thrive. Wild Montana routinely engages in public land-use planning processes, as well as local projects such as habitat restoration and timber harvest proposals, recreational infrastructure planning, oil and gas lease sales, and land acquisitions. Wild Montana and our more than 90,000 supporters are invested in the ecological integrity and quiet recreation opportunities on public lands across Montana, as well as the impact of climate change on Montana's wild places.

II. Current Special Use Permit Authorization

Holland Lake is a unique forest lake on the border of the Swan Front Recommended Wilderness and serves as a gateway to the Bob Marshall Wilderness. We appreciate that the currently proposed special use permit will only authorize the current scope, footprint, and capacity of the lodge as it has existed since the start of the business. Wild Montana is generally supportive of the lodge operating as is.



Once the permit is issued, Holland Peak LLC must submit a final annual operating plan showing how its plans are consistent with the permit terms and the current status of the wastewater treatment system. We expect this final operating plan to be made public. Like many others, we do still have concerns regarding the current wastewater treatment infrastructure. We realize this situation is being addressed on a parallel track through the Montana Department of Environmental Quality and expect this problem to be addressed expeditiously with the full support of the Forest Service. Since the proposed permit is for 20 years, the Forest Service should consider adding a provision to the special use permit addressing the wastewater system in case the agencies are unable to rectify the situation in the near term.

While we also appreciate that additional information regarding the draft operating plan and application was made public with an extended comment period, it would have been beneficial to have these documents at the outset of the proposal announcement to ensure full public participation in the process.

III. Future Plans for Holland Peak LLC

If Holland Peak LLC has any plans to expand or change the uses, operations, or footprint of the lodge, we expect that information to be made available to the public as soon as possible. All the relevant documentation should be provided to the public at the outset and should be subject to full analysis under the National Environmental Policy Act (NEPA), not a Categorical Exclusion, with ample opportunity for public comment. This analysis must include a full scope of potential impacts to the actual lodge facilities and nearby environment, but also on the adjacent wilderness character and wildlife habitat. The last iteration of development plans proposed by POWDR contained many discrepancies and misleading information. This situation only led to increased frustration and public mistrust of the agency, which the Forest Service must be especially cognizant of going forward. Any new Master Development Plans, operating plans, or other discussions of expansion of uses must be swiftly disclosed to the public.

IV. Forest-Wide Recreation Planning

The Holland Lake Lodge proposal continues to provide an additional example of why the Forest Service must conduct forest-level recreation planning. Over the past few years, Wild Montana and our partners have seen a trend in increasing special use requests on the Flathead National Forest. We encourage the Forest Service to create a recreation plan and corresponding Environmental Impact Statement for how the Forest Service will manage growing recreation concerns forest-wide. This would allow for comprehensive, sustainable planning instead of a piecemeal approach, which likely omits cumulative impacts.



V. Conclusion

Thank you for considering these comments. Holland Lake Lodge is a cherished part of Montana's history. Wild Montana is not necessarily opposed to improvements to the Lodge in the future; however, it is critical that the Forest Service conducts a rigorous environmental review analyzing all potential indirect, direct, and cumulative effects. Please keep us informed of any developments in this project, and do not hesitate to contact us if you have any questions.

Sincerely,



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