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Anthony Botello, Flathead Forest Supervisor
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Re: Holland Lake Lodge Special Use Permit Issuance Proposal

Comments submitted via

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

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Dear Supervisor Botello et al.:

Thank you for this opportunity to comment on the *Holland Lake Lodge Special Use Permit Issuance Proposal*.

I am compelled to write because, having followed the Holland Lake Lodge saga over the last several years, it has become viscerally clear that this historic and cultural resource holds extraordinary importance for the people of Montana and beyond. It is equally clear that the holder of a Special Use Permit for Holland Lake Lodge is a steward of the resource, and as such, has special obligations to the USDA Forest Service (USFS), the stewards of our public lands.

This is not just anecdotal opinion. In a report prepared by North Wind Resource Consulting, LLC, dated November 13, 2020, for the Flathead National Forest, Holland Lake Lodge has been determined to be eligible (DOE) for listing in the National Register of Historic Places (NRHP) “as a historic district under Criterion A for its association with remote recreational ranch properties, also known as ‘dude ranches’ constructed in the early- to mid-twentieth century. Overall, the Holland Lake Lodge property retains integrity of location, design, setting, materials, feeling, and association.” The report further recommends “the Lodge building, constructed in 1948, to be individually eligible for inclusion in the NRHP under Criterion A ...”¹

The Special Use Permit (SUP) has a storied history within the USFS that is foundational to the issuance of these permits going forward and the obligations of the permittees thereunder. A 1917 survey of recreation on public lands “recommended that recreation be recognized as equal in importance to other forest uses like timber and grazing and emphasized that recreation structures ‘be arranged according to environmental conditions ... with minimal impact upon the natural beauty of the landscape.’”² These recommendations have influenced USDA Forest Service planning in the decades since, being cited as recently as 2006.

¹ North Wind Cultural Resources Report No. 030481.001, page iv

² Ditto, page 15

By the 1930's, the USFS was requiring building plans to be evaluated by FS staff "to ensure harmony of the building with the natural environment." ³

Significant to this historic resource is a 1940 FS publication entitled Forest Outings. It stated that "particular attention will be given to facilities for the use of those in the low-income groups who can enjoy forest recreation only if its cost is small" and further stated 'uses which require exclusive occupancy, such as summer homes and limited-membership clubs, will be confined to areas not needed by the general public and will necessarily have the lowest priority... (Lord 1940)." ⁴

Beginning in 1960, the USFS no longer promoted the recreational residence program (SUP). It placed a moratorium on new residential tracts in 1968, and it implemented a policy prohibiting the development of new residences on vacant lots in existing residential tracts in 1976. Since then, "the number of recreational residences on USFS lands has declined as permits have expired and not been renewed ..." ⁵

From personal experience with the USFS – the Arapahoe-Roosevelt NF -- I can attest that this trend continues into the 21st Century, the exception being properties that are determined to be eligible for listing in the NRHP. Had the property, which was proposed to be gifted to HistoriCorps® -- the nonprofit organization I headed at the time -- been determined not to be eligible for listing in the NRHP, the USFS would have required the buildings to be removed upon expiration of its then-current SUP.

This historical perspective demands careful consideration of the conditions attached to the issuance of a Special Use Permit and review and approval (or denial) of a Master Development Plan.

- The SUP should reference boldly the DOE report prepared by North Wind Cultural Resources LLC, stating that the SUP is conditioned upon the protection and preservation of the historic resource.
- The Operating Plan should reiterate the Permittee's obligation to the conditions of the SUP and state the Permittee's commitment to preserve and maintain the historic integrity of the buildings in accordance with *The Secretary of the Interior's Standards for the Treatment of Historic Properties*.
- The SUP and/or the Operating Plan should stipulate that the Permittee will nominate Holland Lake Lodge to, and it shall receive approval for listing in, the National Register of Historic Places before a Master Development Plan is submitted to the USFS or by a date certain, whichever comes first.

³ Ditto, page 15

⁴ Ditto, page 16

⁵ Ditto, page 16

- A Master Development Plan will not be approved without a Section 106 review finding 1) no adverse effect on the historic resource and 2) all preservation, rehabilitation, and restoration work and new construction will comply with *The Secretary of the Interior's Standards for the Treatment of Historic Properties*.

Given the history of Special Use Permits as summarized above and recent precedents in land management, it is quite possible that, had the Holland Lake Lodge been determined not to be eligible for listing on the National Register, the USFS would have made a decision not to renew the SUP and required the current Permittee to remove the buildings. Thus, its status as a historic resource is, indeed, exceptional. The USFS has a legal and regulatory responsibility to protect and preserve historic resources on our national forest lands. It is, therefore, clear that the holder of the SUP is a steward of the resource, and with that privilege, upholds the standards of stewardship, which understandably go beyond simple ownership.

Thank you again for this opportunity to comment. I am confident that you will give all of our public comments the careful consideration they deserve.

Respectfully submitted,


Townsend H Anderson