

United States Forest Service  
Flathead National Forest  
650 Wolfpack Way  
Kalispell, MT 59901  
RE: Holland Lake Lodge Special Use Permit  
Attn: Mr. Anthony Botello, Forest Supervisor

May 14,, 2025

Dear Mr. Botello,

The Flathead National Forest announced a proposed authorization of a special use permit (SUP) for Holland Lake Lodge on April 7, 2025. Below are my comments concerning the proposed permit authorization. I appreciate the opportunity to submit my comments in accordance with the National Environmental Policy Act (NEPA). Thank you!

There are several items in the scoping letter and draft 2025 Operating and Maintenance Plan (O&M Plan) that need clarification or definition in the new SUP, but may cause the new SUP to differ substantively from the current 2017 permit. Some of the additional activities constitute an expansion, creating exceptional circumstances for adverse impacts to natural resources; thereby, precluding the use of a Categorical Exclusion.

1. The draft 2025 O&M Plan was prepared by Holland Lake Lodge, LLC and may not be reflective of the plans of the new owners, i.e., Holland Peak, LLC. This document is of questionable value for public comment, if it does not accurately portray the plans of the new owners. If the draft 2025 O&M Plan represents the plans of the new owners, I have concerns that the proposed permit may actually be an increase in scope and magnitude when compared to the current permit. A categorical exclusion (CE) may not be the appropriate level of analysis.
2. O&M Plan, page 1 paragraph 2 mistakenly states that *"The operating plan is an ongoing plan for the length of the permit. Changes do not need to be incorporated, or a new operating plan developed unless there are significant changes desired. There will be a pre-season meeting between the Holder and designated FS Representatives to discuss the needs for the upcoming season and any changes that need to be incorporated into the operating plan."*
  - a. This is in direct conflict with the 2017 SUP, page 4, Operating plans. The 2017 SUP clearly states *"The holder shall prepare and annually revise by December 31 an operating plan."*
  - b. Subsequently, O&M Plan on page 2, item 9, states *"Update the Operation and Maintenance plan annually by May 1st."*
  - c. Which is it? The new SUP should require annual submittal of the operating plan for the coming year by December 31st, giving the interested public time to review and comment.
3. Special Events: Both the scoping letter and draft O&M Plan list as a service *"hosting special events"*; and the Draft 2025 O&M Plan indicates up to 200 persons per event. While I recognize weddings and other events have been held at the lodge in the past, the current 2017 SUP, Appendix C (Authorized Services), does not list *"hosting special events."*
  - a. 200 guests exceeds the guest capacity of the lodge cabins and restaurant seating capacity.

- i. The O&M Plan and SUP (Appendix C), should specify the types of events (e.g., wedding, reunions, fund raisers, concerts, trail runs, mtn. bike races, kayak/ canoe races, etc.). Events spreading beyond the permit area would lead to impacts to resources beyond the permit area and require analysis for compliance with FNF Land Mgt. Plan and other laws and regulations.
    - ii. Enabling up to 200 visitors to add to the current visitor load in the vicinity of Holland Lake Lodge has potential to impact several threatened species and other biological resources, and diminish the quality of experience of other forest users in the area.
  - b. Holland Lake Lodge is immediately adjacent to the Holland Lake Campground. There is potential for disturbance to the campers at the campground, such as a loud music, increased traffic and congestion, unauthorized parking along the road and at the Holland Falls trailhead.
    - i. Where will parking for 50-plus vehicles be located during a special event, parking that will not damage vegetation and introduce noxious weeds?
    - ii. There should be a decibel limit for bands or other loud event noises. For example, some campgrounds recommend that a generator should be limited to 50 to 60 DB at a distance of 5 feet. The National Park Service follows 36 CFR § 2.12 - Audio disturbances: Prohibits noises that exceed a noise level of 60 decibels measured on the A-weighted scale at 50 feet;. If I am camping at Holland Lake, I don't want to listen to loud music or party noise originating from the lodge or other campsites.
    - iii. Disturbance to the campground would conflict with the Flathead National Forest's Land Management Plan, GASV-MA7-Holland Lake-DC; "*Holland Lake Campground and associated recreational facilities provide quality visitor experiences in a natural setting.*" It is noteworthy that the Land Management Plan makes no mention of Holland Lake Lodge, no goals and objectives specific to Holland Lake Lodge.
4. Draft O&M Plan, item 6 states, "Provide a range of recreation activities in forest settings consistent with visitor expectations." What does this mean? This must be defined clearly. Does it include off-site activities, such as guided hikes? There is nothing in the 2017 SUP or past operating plans about providing recreation activities in forest settings.
  5. O&M Plan, page 3; Dates of Operation: "*Year-round.*" The current 2017 permit does not authorize year-round operations. To allow year-round operations would be a substantial expansion of operating season.
  6. O&M Plan, page 3, Site Management Activities, item I, "*Housing owners/ employees on site.*"
    - a. There is a caretaker's house that was constructed in 2009 and it is appropriate for housing a security person. There is no reason to house employees in the lodge.
    - b. Housing employees beyond a security caretaker may conflict with the Forest Service Manual, FSM 2341.5, regarding housing employees at concessions.
  7. O&M Plan, page 3, item 5. Maintenance and reconstruction. Reconstruction needs to be clearly defined. The 2017 SUP states that the holder of the permit is to maintain authorized improvements to "*standards of repair, orderliness, neatness, sanitation, and safety.*" Substantial

“reconstruction” may exceed the scope of the current 2017 SUP. The current 2017 SUP states that holder of the permit is to maintain authorized improvements to “standards of repair, orderliness, neatness, sanitation, and safety.” It does not explicitly state or imply “reconstruction.”

- a. Also, expansion in guest capacity may conflict with the Northern Continental Divide Ecosystem Grizzly Bear Conservation Strategy.
  - b. Reconstruction may also come into conflict with the NCDE Grizzly Bear Conservation Strategy. The revised Biological Opinion for the Flathead National Forest Land Management Plan states: “The Revised Forest Plan would allow no more than one increase in the number or capacity of developed recreation sites ... during the non-denning season per Bear Management Unit (BMU) per decade. Holland Lake Lodge is within the Big Salmon BMU, along with Holland Lake Campground, Holland Lake Day Use Area, and the Owl Creek Packer Camp. Expansion of overnight capacity at Holland Lake Lodge may preclude improvements at other overnight camping sites within the Big Salmon BMU.
8. Wastewater treatment system: a fully functional wastewater system is necessary for full operation of the lodge and protection of water quality at Holland Lake. The campground operated without the system in 2024. For this reason, it seems the construction of the wastewater treatment system should be considered an action connected to the lodge permit application. Also, the RV pumpstation is an unnecessary amenity. RV Dump stations are already available n Seeley Lake and Bigfork.
  - a. A reported leak (2005) at the holding tank at the lodge must be examined and rectified, if necessary.
  - b. The engineering report for the wastewater treatment facility should be released to the public. The report was publicly funded. The public has a vested interest in protection of water quality at Holland Lake.
  - c. The Holland Lake subwatershed (12-digit hydrologic unit code) is one of 10 designated conservation network subwatersheds in the Swan Watershed (see Land Managment Plan, pages 17-18 and Figure B-02). Desired condition FW-DC-CWN-01 states: “The conservation watershed network has high-quality habitat and functionally intact ecosystems that are contributing to and enhancing the conservation and recovery of specific threatened or endangered fish species (bull trout) or aquatic species of conservation concern (westslope cutthroat trout, common loon) and providing high water quality and quantity. The watersheds contribute to the conservation and recovery of native fish and other aquatic species and help make habitat conditions more resilient to climate change.” Holland lake is critical habitat for the threatened bull trout.
  - d. Since the wastewater treatment facility has leaked at least twice in the past, future leaks are likely, placing water quality in Holland Lake at risk.
    - i. Reasonable alternatives for wastewater management should include installing one or two large-capacity holding tanks at the lodge that would be pumped as needed. Such a system would be less prone to failure and leakage and be much less expensive.

9. Riparian vegetation: There is evidence of shoreline erosion in front of the lodge where riparian vegetation has been removed. The lodge should restore riparian and create a couple of hardened shoreline access points for visitors to access the shoreline for fishing, launching kayaks, paddle boards, and canoes.
10. Monitoring compliance enforcement of compliance with the terms and conditions of the SUP and monitoring proper function of the wastewater treatment facility.
  - a. The Forest Service is obligated to monitor permit compliance, and the holder of the permit is to maintain authorized improvements to “standards of repair, orderliness, neatness, sanitation, and safety.”
  - b. The Forest Service was remiss in the monitoring of Holland Lake Lodge, Inc.’s compliance with the terms and conditions of the permit. An unauthorized fence enclosed an additional 3 acres beyond the authorized permit area. An unauthorized cabin was constructed in 2009 and approved in a subsequent year. Unauthorized landing of helicopters at the lodge lawn. Deferred maintenance of buildings led the Flathead National Forest in 2022 to refer to buildings as being in state of “disrepair” and Holland Lake Lodge, Inc. referred to buildings being dilapidated. ° c. The Forest Service was delinquent in identifying and reporting leaks in the waste water system. Close out by discussing expanded scope and magnitude of activities that could have adverse effects to natural resources. The potential for degradation of water quality at Holland Lake is real and creates extraordinary circumstances where threatened bull trout could be adversely affected. The proper environmental analysis should be an Environmental Assessment and possibly an EIS.

Thank you for the opportunity to comment on the proposed action at Holland Lake.

Sincerely,

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