

Data Submitted (UTC 11): 10/7/2022 1:35:19 AM

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Organization:

Title:

Comments: Who I am and why I am submitting this comment:

I am writing in opposition to the proposed expansion at the Holland Lake Lodge. My husband and I own a home at Holland Lake on the "family" ranch. We started our family there and are good stewards of the land and the environment. Our home is located directly south of the Holland Lake Lodge, just up the road from the Owl Creek Packer's camp. Our ranch predates the Lodge as a 160-acre Forest Service inholding homesteaded in 1914. There are currently 5 generations of family connected to this very special place. The original homesteaders published articles about homesteading and the unique setting/environment.

I know my comments are long but I am hopeful that they will be helpful in determining the best option regarding the proposed expansion of Holland Lake Lodge. I am an anthropologist/archaeologist by practice and degree. My adamant reasoning for not wanting this expansion is varied and I request that the Forest Service not go forth with the expansion as is proposed.

The process:

It is apparent that the Forest Service, the present lease owner (Christian Wohlfeil), and the potential new lease owner (POWDR) have not been completely transparent, truthful, and open about the expansion. From keeping the sale "under wraps" while attorneys, real estate professionals, Forest Service personnel, third party contractors and others signed documents and did studies, exchanged moneys, hired PR firms and such - the public was kept in the dark, including local landowners that would be directly impacted. There is not a "culture" of inclusion even though the above-mentioned entities verbally say there is. Their actions speak louder than their words. There is a lot of "trust me" being put forth with no clear justification or negative consequences. When an employee at the Forest Service tells my husband that they can review documents on-line and if they want anything else, they need to file a FOIA application, it does not indicate openness. When newly hired POWDR employees give their word, but the plan says otherwise, there is little the public can believe in.

Even though we live at Holland Lake, we did not know anything about this plan. When it became public knowledge, there was little formal outreach to the public. There are no signs displayed in the area. The media had to request information instead of it being broadcast openly by the above parties. Rumors are not helpful to anyone. There was very little time initially given for public comment. The initial small meeting at the lodge was not well publicized and the informational documents were not complete. The impression, whether true or not, was that, everything was a go, and that this meeting was done merely to check off a required box. The present lease holder was made out to be a hero. Only after public outrage, did the Forest Service extend the deadline for public comment and plan other community meetings.

In my opinion, the small comment period extension is not sufficient. The two local public meetings in the valley were not adequate. Many people did not get a chance to have the questions asked or speak. Data gathering is time consuming and the public should not be forced into an arbitrary short timeframe. The expansion plan has been in the works for years. This expansion has long term affects and the public should be treated with the respect they deserve in order to give constructive criticism and lend insights that should be taken into consideration at the start. I am not a proponent of "not in my backyard" development but rather detailed and complete analysis of all the impacts associated with the proposal so that the decision makers can make a decision with a full range of current and accurate facts.

I doubt if anyone can argue that the roll-out has gone smoothly. It has been riddled with errors, flaws, and

hassles. It is very hard to get clear answers. The public needs to dig and hunt for details and answers. As, more information is finally put forth, more questions are being generated. Details for the sale of the business/lease are not clear and it is easy to see through the PR spin that the present leaseholder and POWDR put forth. Even the size of the land being discussed is not clear because the size of the permit area has changed with no documentation of how/why that happened. Why does the proposal include a new gate from the lease holder's area to the public trail to the falls? Will that be open to all or just paying guests? Permits have been issued for drilling that are questionable. Even the online comment period has had errors. It was advertised that people could comment until October 7th but online it said the comment period closed at 12:59 pm on October 6th. Errors like this are numerous and do not help in developing a culture of mutual respect, transparency and valued inclusion.

In addition, the date chosen for the public meetings was on eve of Yom Kippur - the most sacred day in the Jewish religion and culture. It is the day of atonement. As is well known, people refrain from their everyday activities. The date is clearly listed on just about every calendar published in the US. By scheduling a meeting on that day, a whole portion of the American public was clearly not taken into consideration. I for one, was upset that I could not participate and feel that my voice was appropriately heard. I understand that it is always difficult to plan a meeting, but I am sure that no such meeting would be held on Christmas or some other Christian holiday.

The land is owned by the American people and is managed for the American people by the US Forest Service, under the US Department of Agriculture. It is not beholden to private enterprises. It does not need to show a profit to its shareholders. The Forest Service is a multi-use agency that is supported by the American taxpayers. It must constantly reassess and balance its resources with the needs/values of the American people. The Holland Lake Lodge expansion project and the associated special needs permit need to be thoroughly analyzed for the American people today and for future generations.

There is a perception that the Forest Service is merely rubber stamping a large development proposal and the public's concerns really do not matter; that no matter how and what is objected to, what is questioned, the expansion will go forth (maybe with a few minor changes but largely intact). I hope this perception is not accurate and that the public's involvement will be encouraged and considered and valued.

Request for more in-depth analysis and involvement:

I am formally requesting that the Forest Service undergo a full -fledged assessment of the proposal with real input from the community regarding the immediate and long term affects that this expansion will have on all elements - whether they be cultural resources, natural resources, social and environmental impacts, economic impacts, water/air quality, etc. The list is long and extensive but I am sure that my message is clear.

The rationale and use of a categorical exclusion for this expansion is flawed. The project as proposed exceeds the limits of acceptable change and would be a significant detriment to local, regional, and national values related to cultural and natural resources that attract people to the location and the area. There is no documentation that clearly demonstrates that the full picture of the social, cultural, and biophysical environment will be looked at. The setting at Holland Lake is unique. POWDR wants to gain a foothold into this unique environment to expand its business. The project's impacts on that unique setting far surpasses the actual site itself, though direct impacts to the site are also important. The potential impacts to the site and surrounding local and regional areas indicate the need for a more extensive environmental analysis.

It is important the public be given access to all the necessary information, including the criteria on which the decision will be based. Studies and analysis should be available to all. When the public is engaged and there is a relationship of trust, everyone benefits. No one wants to encourage lawyers to get involved and have everything be held up in court and have a judge make decisions. Why not engage in the early stages? The outcome will probably be better for all involved.

Use of a categorical exclusion:

The use of categorical exclusions under NEPA for special uses and permitting "include activities like issuing special use authorizations to build a water pipeline and storage tank for an area with poor water supply and quality. Other examples are authorizing development or improvements for a communication site or authorizing an outfitter to lead guided hikes on a popular hiking trail." Categorical exclusions are often used to reduce redundancy in analyses when project areas are significantly similar ecologically and socially.

The project proposed for Holland Lake is at a level and scale well beyond the extent of the Agency's own examples. Agency procedures must consider "extraordinary circumstances" in which case a normally excluded action may have a significant effect and require preparation of an EA or EIS. Holland Lake and its locality, including the historic Holland Lake Lodge (soon to be renamed if the proposal goes through), is essential for maintaining the public's (local, statewide, regional, and national) connection to important and long-held values.

Cumulative effects and alternatives:

I request that the Forest Service analyze the cumulative effects of the project on the actual site and all of its surrounds. In addition, to the people across the country with ties to the area. This could be extensive and significant. Time after time and place after place, the special places that exhibit the qualities held in abundance by Holland Lake have been subject to developments that have reduced the values that make them so attractive in the first place. There are fewer and fewer places where relatively rustic settings not trammled with the frills and creature comforts of cities exist. This is a rare setting of a type that is getting rarer all of the time, which means its value continues to increase.

There need to be places where everyday people who can't afford the exorbitant prices of hyper-developed properties can go and enjoy the area. This is especially true when public lands are involved, even if those public lands are under special use permit. The proposed project would unacceptably degrade the unique "specialness" of Holland Lake and the general American public would lose another place to go. This disappearance is happening all across the nation. The project as currently proposed is at a scale that would not be in the best interest of the American public.

I encourage the Forest Service to look at alternatives to the proposal that would benefit everyone. I would like the Forest Service to fully engage with the public. Can the Forest Service run the lodge, can it be done by a non-profit, does it really need such a huge expansion?

Lack of involvement of indigenous communities:

I am also concerned when none of the public documents talk about the indigenous connections to the project area. Even more concerning is the lack of information about whether government-to-government consultation have engaged the tribes with cultural ties to the Swan Valley and Holland Lake for millennia. This should have been done already, although I have heard that it may be in the works. Tribal consultation is a parallel yet separate process and the tribal input is reinforced by the Tribe's standing as a sovereign nation and by their millenia-long association with the Swan Valley. The general public should be made aware of the details of such consultations.

Leaseholder as a steward of the Forest Service permit and the requirement to following civil rights rules:

I do not think it is the Forest Service's job to support a business that's main priority is profit (either Christian Wohlfel, or POWDR or anyone else) to the detriment of the American public. The Forest Service should seriously consider alternatives to the existing special use permit arrangement. Several decades ago, when the 100-year leases ran out on land given to the railroad by the government and they were leased out to the public,

the railroad did not renew the leases. Yes, homeowners, were not happy and may have never expected that to happen, but they knew they did not own the land. They were not blindsided. The Forest Service and other agencies have chosen in the past to not automatically renew leases or to take the leases back from private businesses across the country. Is this an option?

The present lease holder claims the building are in need of repair, he cannot find enough help or make a decent living there and therefore he must sell it. All business take risks and it is not the governments job to make them as profitable as the owners would like. It seems that the Forest Service should have been requiring the present lease holder to do needed upkeep and maintain the property as is required by the permit. He is welcome to sell his business and profit from it, but not at the expense of the American public. He and POWDR need to remember that they do not own the land and are merely using a permit.

I am concerned that the present lease holder has not necessarily been a good steward of the values that the American public cherishes and that the law requires with regards to respecting diversity, civil rights, and equal employment opportunities. Over the years, my husband and I have taken visitors to the lodge area and lakefront and have never been welcomed by the present lease holder, even when the visitors are looking for information for future reservations. We have been consistently told to leave and been reminded that it is "private" property and we needed to leave. For example, last summer, we brought friends down to the lodge to see the place and enjoy the beautiful view. They were interested in potentially staying there at a future date. Christian met us on the lawn by the lake and his statements were extremely disturbing. He was complaining about not being able to find enough workers. In the process he claimed that "My customers don't like to be served by people who are not white. And white people don't want to work." We, all found this to be disturbing, racist, and unacceptable, and certainly not in keeping with the requirements of holders of special use permits issued by the Forest Service. Our friends were so disturbed that they wrote to him on social media but there was no response. Will these practices continue and be swept under the rug? I understand that businesses everywhere are having a difficult time finding staff, but remarks such as this are not acceptable, especially by leaseholders of the US government. Civil rights laws and regulations should be enforced.

Social analysis needed:

I would like the Forest Service to conduct a social analysis in balance with Holland Lake's unique and rare setting. That should include a systematic analysis of the perceived and real impacts to (1) residents in the immediate area and at least within a few of miles (2) residents connected to Holland Lake and the nearby roads, (3) residents in the general Seeley-Swan area, (4) people with long-term association with Holland Lake (Montana residents or not), and (5) the wider public. Public comment is important, but systematic collection of the associated values of people with real connection to this location is essential.

Holland Lake's natural, cultural, and social environment is unique and calls for more consideration of the effects on local residents and in addition to the larger picture of what the public values, beliefs, and attitudes are concerning the setting, and the economic trade-offs between expanded development and the current condition. I do not believe that the perceived economic advantages and changes to the recreational environment are worth risking. The reasons why people are attracted to the setting will disappear. I would like Forest Service to have a qualified social scientist, conduct a systematic inquiry into the values, beliefs, and attitudes associated with Holland Lake and its surrounds. For reference, please see the Forest Service's guide to collecting public attitudes, beliefs, and values, available at <https://www.fs.usda.gov/treearch/pubs/33266>.

I also request that the Forest Service engage the assistance of a qualified third-party economist or economic research group to look closely at the most likely local and regional economic impacts of the proposed project, at several different scales of development/growth. The economic models employed by the Forest Service are not designed, nor adequate, for economic analysis of projects of this type.

Where is the economic development plan for the expansion published? I have not been able to access that. POWDR has been working on purchasing this lease area and developing it for years, and I doubt they would have put money on the table and signed documents without a fully written out plan.

Economic values and impacts alone are not sufficient, nor are the benefits afforded the recreating public. The rights of and impacts to private land owners, including us at the Clark Ranch and others who live or have properties in close proximity to the Lodge, should be fully considered.

Economic analysis for local landowners needed:

The economic value of private land in the area would be directly affected by development. The value of a rural setting that is quiet and relatively undisturbed by road, off-road, and aquatic motorized use is in some ways an intangible value. However, the economic value of private land like the Clark Ranch would also be directly and unacceptably negatively impacted by the project as proposed. A more modest proposal that would affect the setting less, would have fewer negative impacts on local land values, may be more acceptable. Again, an independent economic analysis would be needed to fully assess the level of that impact on us and other landowners in the area.

Viewshed analysis needed:

The project as proposed is no small change to the amazing viewshed of Holland Lake. The number and size of the buildings, and especially the view of new structures along the lakeshore, would completely change the setting for people using the area. This would reduce the value of a relatively undeveloped and beautiful lake to the American public and should not be allowed. The project proponents and the Forest Service should analyze the views not just from the Lodge area looking out, but from the surrounding area looking in.

A scaled back version of the plan should include significant set-backs of all structures to reduce the impact on the viewshed. One of the most iconic views in the world is from the bridge across Holland Creek at the outlet of Holland Lake. The project as proposed would unacceptably mar views from that incredible spot, as it would from anywhere else along the lake itself. Other iconic views are found high on the trail to the falls and along the trail to the Bob Marshall Wilderness from the Owl Creek Packer Camp. Those views should be considered in any design for any expansion to the Holland Lake Lodge.

While the summer homes on Holland Lake exist under a different type of special use permit than the Lodge, the setback requirements to maintain the viewshed should be consistent between the two types of permitted properties. They are not allowed to cut as many trees on their leased land and I think the Forest Service should maintain the same rules for the lodge expansion.

Analysis needed regarding the water, wastewater, and parking area:

The Forest Service needs to do a more thorough analysis of the proposal for water, wastewater, and sewage in the expansion, as well as the proposed parking areas. If those impacts are found to have a potential to impact to the water quality of Holland Lake, or if it has potential impact to fisheries/wildlife, the project should be scaled back or rejected. The proposed buildings are much closer to the lake than the original ones. It is my understanding that there are issues with the present wastewater facility. How will the proposed expansion mitigate the present problems without creating more impact on the land and how will it work with the campground? The devil is always in the details regarding financial issues, responsibility and maintenance. The report in the public record looks at the current condition but makes insufficient recommendations and observations on the needed modifications to support the entire expansion. The timing of the analysis is also problematic.

Analysis needed for noise, dust, and traffic:

I would also request that there be a detailed analysis done regarding noise, dust, and traffic pollution. At the present, at my home and all around the Clark Ranch, we already hear the late-night parties from wedding celebrations at the Holland Lake Lodge, loud motor boats on the lake, and general festivities. The sound travels easily and is loud enough that we can dance in our yard to the music. We don't complain and understand that people are having a fun time but with increased visitorship, that noise could expand to being distressfully disturbing. It is not difficult to envision a scenario in which weddings or a large celebration are held nearly every weekend, year-round. If that were to happen, the relative peace and quiet of our rural family property would be unacceptably changed. Other residents around Holland Lake are also alarmed about the potential for increased noise emanating from the lodge and from increased traffic on the roads and the lake.

In addition, increased motor boat use would not only severely impact our soundscape, it could impact fish and wildlife in and around the lake. POWDR has said that it does not intend to provide motorized watercraft or other machines. However, increased visibility of the Lodge through advertising, additional visitors, and social media will increase overall demand for visitors to Holland Lake, including people bringing their own toys or renting them elsewhere. Third-party contractors will fill the void and supply the visitors. The economic status of people who can afford to stay at the lodge is such that they will either have or be able to easily obtain motorized toys that will severely impact the soundscape of Holland Lake and its surrounds. Usage of the lake is already at all time highs with boat trailers frequently having to park on the road because there is not enough room at the boat launch parking lot area.

We get impacted by noise from people on our road (Forbidden Lane) and Owl Creek Loop too. People often drive up to the ranch, exploring, or just being lost, either off Forbidden Lane or the Owl Creek Loop Road. Some respect the property boundary but others ignore the signs and the fact they are on private property and proceed anyway on to our ranch. Some can't seem to figure out how to turn around on the Forest Service Road. This includes regular cars and trucks, but there is already a proliferation of ATVs and UTVs. The number of side-by-sides tearing up and down the road and power line access clearings has continuously increased. That use now goes well into the night. Last week at 9 pm, in the dark, there were two side-by-side vehicles tearing up and down the power line leading to our property, creating a loud racket and causing who knows how much damage. With increased visitation at the lodge, there will be more traffic on the Forest Service Road that leads to and dead-ends at the ranch, as well as on other roads that lead to or pass by local residences. The Forest Service does not maintain the road that leads to the ranch and it is in very poor condition, partly due to public traffic. There are large potholes everywhere. In order to access our home, we need to pay to have the road plowed by a private contractor. With increased traffic the road conditions will be even worse. The summer dust from the dirt is already bad and coats my home. The increase in traffic will cause even more unhealthy dust in the air. The sense of isolation, peace and privacy at our family ranch will forever be changed. What impacts will it have on the abundant wildlife in the area too? Additionally, use of the gravel pit on Owl Creek Loop as a camping area is ongoing all season. Trespassers frequently ignore the private property markings and access our ranch property which is near the gravel pit. I am sure that this expansion project, will cause even more visitors to gain unauthorized access.

Increased impacts from hunters and year-round visitors:

Additional visitorship at the Lodge would undoubtedly include more hunters, especially as the lodge expands its seasonal capabilities. This would result in higher levels of hunting pressure, impact to habitat, more human/bear conflicts, etc. We already experience hunters on or in close proximity to the ranch, including trespassers on our private property. The area is flooded with hunters all fall as it is. Our home is close to the boundary with the Forest Service, and not all hunters are as courteous as we would wish regarding where they hunt or aim. That intrusion would only increase should the proposed project proceed as planned.

In addition to the direct impacts on the road to the ranch, the additional turn-arounds at our property and outright

trespass, it will be necessary for the Forest Service to provide additional road maintenance (they currently do not maintain the road at all), signage warning travelers of the dead-end at private property, and a necessary gate. The gate would preferably be placed in a location where large vehicles pulling trailers could more easily and safely turn around that is not on our private property, closer to the Owl Creek Packer's Camp. The windy road from the Owl Creek Packers Camp to our home is a narrow non-maintained road. That would be a public benefit, not just a protection for us at the ranch.

Additionally, the proposed expansion calls for year-round recreation, which will have a huge impact on the area. Presently the area is frequented by some ATV/UTV/snowmobilers and such. The annual dog-sled race goes behind the ranch and use the Owl Creek Road and Owl Creek Packer's Camp. At present we are not severely impacted by the activity. However, whether or not the lodge offers visitors those machines to rent or use, we can all be assured that there will be an increased usage of such recreational machines. That increased activity will affect our exposure to trespass and drastically negatively affect our soundscape. Snowmobiles and such do not depend on roads for their pathways, so they are more likely to trespass into the serene and pristine snowscape that we enjoy at the ranch.

Analysis of fisheries and wildlife needed:

An in-depth analysis of the fisheries and the wildlife in the area should be to done and the information needs to be made readily available for the public to use, preferably before the expansion is given the go ahead. The area is renowned for fishing opportunities. The identification of critical bull trout habitat in the area is well known and should be considered a major concern. The potential for increased fishing pressure and potential for effects to habitat through increased visitation, whether by fishers or other recreation seekers may be significant. Again, the additional water use at an expanded Lodge facility and associated structures should be analyzed for its effects to the water table and concurrent impacts to fisheries habitat.

It is well known that the project area is within the Primary Conservation Area under the Northern Continental Divide Ecosystem Grizzly Bear Management Strategy. Why has the USFWS not been engaged in consultation yet? When will the biological analysis been completed? And when will that information be made public? The sooner the USFWS is in the loop the better. There are grizzly bears in the area, regardless of what the lodge manager and other project proponents have stated. Approving this expansion as proposed will fail to abide by the spirit of the Conservation Strategy to manage public land in the NCDE recovery zone to assure the maintenance of a healthy grizzly bear populations in the face of increased private land development and ongoing climate change.

It is not only grizzly bear and grizzly bear habitat at stake. There is a plethora of other wildlife species that could be impacted by the level of increased recreation-oriented visitorship. Those impacts affect an area much greater than the Lodge permit area. This would without doubt create significant negative impacts throughout the Swan Valley on wildlife habitat and many species including bears (both black and grizzly), lynx, wolverines, deer, elk, moose, bobcats, mountain lions, sandhill cranes, loons, beavers, bats, and so on. The proposed expansion of the Holland Lake Lodge is not appropriately scaled because of the cumulative negative impacts on wildlife due to increased recreation on public lands outside the lodge site.

Cultural and historical structures and overall setting and archeological review:

I was happy to see that the proposal included some preservation aspects to the historical structures and some upgrading of some already existing buildings but in general, the expansion is at odds with the historic values that attract people there to begin with, including the integrity of location, design, setting, materials, feeling, and association of the historic district.

The fact that the old Lodge and many of the other buildings on the site are dilapidated and in need of repair falls directly on owner of those structures and leaseholder. It is the permit holder's responsibility to keep up the property and the current holder has failed in that responsibility. The present lease owner states that is one of the

reasons he needs to sell it and POWDR is willing to buy it, given the expansion.

None-the-less, the old Lodge building retains its integrity of location, setting, materials, workmanship, feeling, and association. The extensive changes to the setting as envisioned by the expansion plan include removing most of the buildings that contribute to its eligibility for inclusion on the National Register of Historic Places, and would create a multitude of other buildings that are not historic structures. A third-party contractor has already written a report that identifies the area as a potential National Register Historian District, even if not all the buildings are eligible, given their age, modifications and such.

Those proposed changes would significantly diminish the feeling and association of the historic district and the old Lodge building. The changes would eliminate the area as eligible for listing on the National Register of Historic Places as an historic district, essentially destroying cultural resources. That would be an unacceptable significant adverse effect. Instead of tearing down the oldest building, the gift shop, can't it be restored to its original shape? Why not honor the historical significance of the area? Let's look at other alternatives.

If the other buildings are constructed as illustrated in the plan, they will only distract from the historic character of the setting. This is especially true for the new building adjacent to and almost touching the old Lodge. That new building will detract from the feeling, setting and association so much that the old Lodge itself will no longer be eligible for listing. Architecturally, the change would be significant. That also would be an unacceptable adverse effect. Mitigating these impacts would require a substantive design change in consultation with the Montana State Historic Preservation Office and with the Advisory Council on Historic Preservation.

I am concerned that there is no current information regarding the cultural resources of the area. I understand that many decades ago, there was an archaeological survey done of the area and, according to the Montana State Historic Preservation Office, that survey is out of date and therefore inadequate (from the 1990's I think). Therefore, it is not possible to do even a preliminary determination of the potential impacts to historic or prehistoric resources at the project area or in the surrounding areas that could be affected by primary activities on site or secondary impacts of increased visitorship.

Further historic and archaeological work should be done prior to a decision regarding the project, and that work should include survey and testing in close consultation with the Tribal Historic Preservation Office of at least the Confederated Salish and Kootenai Tribes of the Flathead Nation. In addition to the direct value of identifying and protecting cultural resources potentially impacted by this project, the involvement of the Tribe could increase the partnership between the Flathead National Forest and the Tribe. There is potential that the area is a traditional cultural landscape or even an indigenous sacred place, so working with the Tribe's cultural committees at the very earliest opportunity is essential.

Engagement with other agencies:

I am also concerned with the impact on the Missoula County infrastructure. Has the county been involved with the plan? I have not seen any documentation with respect to this. With the increase in visitors, there will more traffic, more use of emergency services which are already strained, public safety, etc. The impacts will go beyond Missoula County as Holland Lake sits midway between Missoula and Kalispell. Have there been consultation/analyses done with other state and federal agencies? The Holland Lake area is situated close to areas where other agencies manage their resources. Not only is it close to Glacier National Park but an assortment of other parks or wilderness areas, etc. It would be beneficial to all work together and share data for the overall benefit of the American people and enable the decision makers to determine the best options.

Conclusion:

In conclusion, I strongly request that the decision makers at the Forest Service reject the expansion project as is



proposed or engage with the public and other entities to find alternatives that would be better suited to Holland Lake on behalf of the American public. I encourage the Forest Service to seriously review and consider all the thousands of comments they have received and all the verbal comments that they have heard, both on the record and in private conversations. I look forward to being able to review more in-depth analysis as it is done and made public. Thank you.