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Title:

Comments: I am writing to strongly oppose the proposal from POWDR related to Holland Lake.

I support an appropriately sized, environmentally neutral, and inclusive commercial use of Holland Lake. I would support the Forest Service taking on the existing Holland Lake Lodge property and cabins and renting them out. I would support the Forest Service awarding the permit to a different person who would do something smaller and in keeping with the use of the lake including a very large campground and recreation for hundreds of people from the public who enjoy it and don't need to pay very high and non-attainable prices.

What POWDR is proposing needs to be done on private land - it does not belong on Forest Service property that belongs to the public. Industrializing Holland Lake Lodge will not improve the natural resources. It will not result in more secure habitat for wildlife. It will not enhance or sustain the average American's access to the lake, now will it help locals better recreate at the lake (consider the average income in the Seeley/Swan Valley compared to what POWDR is planning to charge).. So what is the Forest Service's motivation to approve it over huge local opposition?

The Forest Service needs to back up and start the scoping process again - but this time with clear and accurate records and a 60-day public comment period as the first step in the development of a Draft Environmental Impact Statement that also covers the cumulative impacts of your entire recreation and Special Use Permits (SUPs) programs.

POWDR Holds no Special Use Permit for Holland Lake Lodge - the facts make it appear that POWDR, the current permit holder Christain Wohfeil and the Forest Service (FS) are trying to quietly move forward this mega-expansion in under Wohfeil's SUP.

The 4/15/22 Master Development Plan (MDP) was not available on the Project web site until 9/6/22, five days after you first asked the public to comment on the Project. MDP Appendix B and C were not available until even later, denying the public prompt access to the "Technical Memorandum - Holland Lake Wastewater System" and "Holland Lake Lodge - Determination of Eligibility [for historic designation]". The current (5/26/17) Wohfeil SUP makes it clear that a transfer of title or any change in control of the business entity "shall result in termination of the permit" and that any new owner or controller "must submit an application for a special use permit. The Forest Service is not obligated to issue a new permit to the party who acquires control."

The Scoping Letter references an "existing 15 acre permitted area" but the Wohfeil SUP says "this permit covers 10.53 acres." The FS has failed to provide the amendment to the SUP that increased it from 10.53 to 15 acres. Instead, the Scoping Letter provides Figure 2, a map showing a Holland Lake Lodge Permit Area on the order of what appears to be some 30 acres. What is the actual size? Why are the documents in conflict?

It is inappropriate that Brian Stewart is a signatory to this SUP Amendment #2, even though he works for POWDR and the email he provides on page ii of the MDP is bstewart@powdr.com . POWDR has no ownership or interest in the current Wohlfeil SUP and that the SUP must be terminated if POWDR is to take control of or title to Holland Lake Lodge? Standard language in the Wohlfeil SUP makes it clear "The Forest Service is not obligated to issue a new permit to the party who acquires control."

I understand that Wohlfeil hired consultant North Wind, who found that both the existing Lodge and the Lodge

property are eligible for listing in the National Register of Historic Places. Nor does the Scoping Letter make clear that 6 of the 8 structures contributing to that eligibility would be torn down under the Project. Slow down and properly consider the impact on historic places.

Flathead Forest Plan Standard FW-STC-REC limits increases in developed recreation areas, which include "cabin rentals" and "guest lodges" to "one increase above the [2011] baseline . . . in number or capacity per decade per bear management unit." (Forest Plan at 60). Through what public process has the Flathead determined that the public needs an increase in recreation capacity in this bear management unit and that Holland Lake Lodge, above all other sites, is where that increase best occur? It hasn't, pure and simple. If even needed in the first place, might not the public be better served with an increase in the capacity of the Holland Lake Campground, for example? By automatically selecting POWDR to receive the "rights" to increase developed recreation in this bear unit, the Forest Service seems to be prejudiced in its decision.

The FS in it's 10/04 meeting in Seeley Lake mentioned that the protected loon already nests by the trail to Holland Falls so seems to not be bothered by people. But what would happen if the lodge triples in size and the traffic along that easy trail to the falls also tripled - what would be the impact on the nesting loon in that case? The impacts from this Project reach far beyond the 15-acre "permit area." As described above, the Project intends to promote recreation in the area. It would do so not only through the expansion of facilities in the permit area, but through outfitter and guide services that expand ever outward. Dr. Chris Servheen, retired FWS Grizzly Bear Recovery Coordinator and now President of Montana Wildlife Federation, addresses impacts to wildlife in his comments on this Project.

In the 10/04 public meeting, POWDR representatives indicated that they are helping the US housing crisis by providing employee housing year round on their property. I currently have a permit for a cabin at Holland Lake so I know that these permits DO NOT ALLOW year-round residence. Holland Lake/Christian Wohfeil should be held to the same requirements to follow his permit.

I ask that you flatly reject this proposal for expansion of the Holland Lake Lodge and prepare an EIS with a wide range of alternatives that address the cumulative effects of all recreation and SUP programs on the Flathead National Forest. Then see where a proposal for expanding or improving Holland Lake Lodge does or does not fit within that context.

The USFS should live up to its motto and protect what makes this area unique- loons, clean water, bull trout, grizzlies, quiet, small, historic solitude, local use, public access, fish, wildlife and habitat. This project does not fit the location. This is not a minor change. It is not low impact. 300% more occupancy. 330% more built area under roof. 2000% more parking. It is not appropriate for a Categorical Exclusion. Please require an EIS.

Again, I am not opposed to improving the Holland Lake Lodge or modifying the permit but this proposal from one of the largest ski operators in the nation to make this available only to the rich people is totally out of proportion for the small lake and would damage this area for the many Montana residents and people from all over who access the lake through the campground, day use, and current lodge.