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Organization:

Title:

Comments: Flathead National Forest

Kurt Steele, Forest Supervisor

Shelli Mavor, Project Lead

Please accept these comments into the public record in reference the expansion plans for Holland Lake Lodge Facility Improvement and Expansion #61746.

I have lived in Montana for most of my adult life. I have been camping and hiking Holland Lake for most of the years I have lived in Montana, and honestly can't remember how many years ago I came to Holland Lake for the first time. I am a Montanan of modest means. I come to Holland Lake to use the campgrounds, day use area, hiking trails, and to be on the water on my paddle board. Many times I have paddled to the middle of the lake, where even from far away, the falls can be heard because the lake is so quiet. Holland Lake is one of my favorite places in the world. I now have a son, and am passing on that reverence for special places to him. He loves camping at the lake, looking for turtles, and watching loons fish on the lake in the evenings. I object to the expansion plan for Holland Lake Lodge.

One of my main concerns is the wild habitat at and around the lake. This area is critical habitat for several endangered or threatened species, grizzly bears, lynx, bull trout, wolverines, and loons. This is one of the last lakes where loons nest. Loon nesting habitat is especially delicate and this expansion plan shows buildings and habitat loss right over where loons currently nest.

This project encroaches on protected wetlands. Several of the bunkies and the honeymoon cabin are in the middle of wetlands at the edge of the lake. I would say seasonal, but this is the first year I have ever seen them dry, and only toward the end of August/September. These are typically year around wetlands. It is not legal to develop wetland. In fact, this area appears in the government's own GIS mapping software as actual lake, not land at all.

This project represents a misuse of NEPA. This project is far too large to qualify for a categorical exclusion. The impacts that this project will have are far in excess of what is meant to pass as a categorical exclusion. I would like to request that the Forest Service complete a full and more detailed environmental impact study. Not only that, but supervisor Steele told a group of us after the Seeley Lake meeting that all he needs to do is report the impacts and acknowledge them but they do not need to change his plans. While not necessarily false legally, the reality of judicial review under NEPA has in fact supported following the recommendations of EIS findings and has resulted in projects having to be cancelled or modified. I request that the findings in the environmental impact study be reported to the public and their recommendations followed by the Forest Service.

I also have many concerns about this process and how it has been carried out. POWDR released the master development plan to the Forest Service in April of 2022, but the public was not informed until September 1, 2022. Mr. Steele has stated that this was because the Forest Service needed time to see whether or not this was a valid proposal before presenting to the public. This reasoning is disingenuous and insulting to the public owners of the land at best, and more likely, is underhanded and corrupt. It is clear that the Forest Service has been working with POWDR since long before the information was available to the public. I request a full release to the public of all the documents, maps, plans and surveys already generated by this process. POWDR and the Forest Service have been very secretive and have not disclosed many relevant pieces of information, just the first of which is the maps showing the Special Use Permit area increases. The Forest Service apparently did not even know just how large this proposal in fact makes the permit area. The approval for the drilling of the new wells, signed well before plans were released for public comment, is another document relevant but not disclosed to the public.

In light of how many details and parts of the project that have been misrepresented or not at all disclosed, the Forest Service needs to extend the public comment period so that members of the public can read and comment on the new information. The public comment period needs to be extended beyond the October 7, 2022 deadline.

I would also like to request that an investigation of the transfer of ownership of the special use permit be done.

Special Use Permits are not transferrable. If the past owner of the SUP has, as he has stated, sold his shares in the permit to POWDR, then that SUP is no longer valid. At this time, Christian W. does not even appear on the staff of Holland Lake Lodge, Inc. although he is reported to be a shareholder. This is illegal transfer of the SUP invalidates it. The Special Use Permit needs to be rescinded and POWDR made to reapply, or cancelled altogether. The Forest Service is under no obligation to extend the permit to POWDR.

Ultimately, I am requesting that this project proposal be denied because it is not in the public interest. POWDR and the forest service have repeatedly said that the reason for this project is so that more people can enjoy what the lake has to offer. The lake is already very enjoyable and many people spend lots of time there. It is not the public's fault that the lodge is in disrepair. If visitors cannot enjoy the quiet, the nature, the animals, perhaps they should look elsewhere for their entertainment.

Sincerely,

Montana resident and public land owner

Tonia Janzen