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Organization:

Title:

Comments: To the US Forest Service, Flathead National Forest

Holland Lake Lodge proposal comment

By F. Carleen Gonder

To all concerned:

I'm 76.

My courses at the University of Montana for undergrad and grad degrees: wildlife biology, natural resource conservation, and criminology/forensics.

I've worked for three different federal land management agencies:

- US Forest Service - wildland firefighter on three different Ranger Districts, all on the Lolo National Forest
- National Park Service - bear management in Glacier National Park and law enforcement in Yellowstone National Park
- US Fish and Wildlife Service - law enforcement officer on several National Wildlife Refuges

Does this make me an expert on public land use? No. But my university classes and work experience have given me a heightened awareness of natural resource needs and issues. I've seen and experienced much in regards to our federal public lands. I've witnessed firsthand the changes brought about by ever growing recreational use and its negative impacts on wildlife habitat and wildlife. I've witnessed firsthand the corporatization of that ever growing recreational use.

When I was in graduate school at UM, my research site was on Lubrecht Forest, university owned land immediately adjacent to Paws Up, that sprawling resort facility in the Potomac area. I witnessed vehicle trespass by Paws Up personnel transporting their ultra rich "guests" to look for elk on Lubrecht Forest, and other misdeeds. We all know the history and purpose of Paws Up. But that mega resort for their ultra rich guests is on private land.

POWDR is a twin of Paws Up...but what they are proposing is on PUBLIC, not private, land, land that belongs to all of us, rich and poor. Their expectation of US Forest Service's categorical exclusion for their proposal on OUR land means exclusion of us, those of us who own that land, those of us who aren't ultra rich and would never be able to afford their corporate driven thrills.

Holland Lake. It's an area that has significance to all of us who have serious concerns over the proposed expansion, that small lake that sits in a small basin at the foot of the Swan Range, that range that forms the west boundary of the most unsanitized landscape in the Lower 48. The entire area is critical habitat for wildlife that would be negatively impacted by their proposed expansion. To name a few: grizzly bears and Canada lynx - threatened species listed under the Endangered Species Act, wolverines and loons on the lake. All would be negatively impacted by the dramatic increase in those that would be seeking their adventure thrills at Holland Lake Lodge, their proposal also including the Lodge being open for business year round, rather than seasonal use.

It was initially stated that the leased US Forest Service acreage for Holland Lake Lodge was 15 acres. But that is a mistake. The leased federal land is actually only 10.53 acres. Their proposed expansion plus operating systems including waste water disposal would actually need almost twice the current area of our public land that is under lease.

The Flathead National Forest received notice of the expansion plans in April 2022, but did not notify the public, the public that owns the land, until 1 September 2022, and setting the period for public comments until later in

September, then extending the comment period until 7 October 2022.

Someone I know personally posted under comments to one of my posts a screen shot from the Montana Secretary of State of a Business Entity Report for Holland Lake Lodge that included the entity number. That report is dated 6 October 2022 and includes: Registered Agent: Christian Wohlfeil (Current "owner" and operator of the lodge); Directors/Officers: President - Justin Sibley (CEO of POWDR), with address of 17940 Olympic Pkw, Ste 210, and Other Officer - Tim Brennwald with the same address as the CEO of POWDR; Share holders - Christian Wohlfeil.

I checked the Montana Secretary of State's webpage, entered the entity number for Holland Lake Lodge which produced a similar Business Entity Report for Holland Lake Lodge, this one dated 2 February 1997. The mailing address for the 1997 report: 17940 Olympic Pkw, Ste 210, Salt Lake City, Utah 84098 (the same address for POWDR). On this document Christian Wohlfeil was noted as non-commercial registered agent.

These two documents indicate POWDR's involvement with Holland Lake Lodge since at least 2 February 1997.

During the public meetings this past week, and in OpEds written by Christian Wohlfeil and POWDR's CEO Justin Sibley there has been no indication of POWDR's involvement going back as far as 1997, in fact, quite the opposite.

Given what has amounted to misleading statements by POWDR representatives including the CEO Justin Sibley, and by Christian Wohlfeil, I believe we have been intentionally misinformed.

Given the above, I insist on no to the US Forest Service's categorical exclusion on assessment of POWDR's proposal. The US Forest Service MUST conduct a full EIS under NEPA (National Environmental Policy Act). POWDR's proposal would cause irreparable harm to the area including that small lake that sits at the base of The Bob Marshall Wilderness Area. That proposal is meant to benefit high paying customers/guests only, NOT the environment it sits on, that environment being wildlife habitat on OUR land, federal public land. The US Forest Service must absolutely consider the thousands of letters sent by those who oppose POWDR's proposal on OUR federal public lands. And the US Forest Service MUST extend the comment period.

And I close with what I have been saying for many years:  
I used to believe it to be pockets of humans surrounded by Wild.  
Now I sadly see it's pockets of Wild surrounded by humans.

Respectfully submitted by:

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c.c. - Montana's US Senators