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Title:

Comments: USDA Forest Service

Flathead National Forest

RE: Special Use Authorization ID: SWA 456

Holland Lake Lodge Master Development Plan

Subject: Comment Opposing Permit Approval and Expansion at Holland Lake Lodge

Please accept these comments into the public record in reference to Holland Lake Lodge Special Use Permit Issuance Proposal #67937.

I am writing to express my opposition to the approval or transfer of the Special Use Permit for Holland Lake Lodge in its current state to the proposed new owner. My opposition is based on several factors both environmental and procedural. The Flathead National Forest is under no obligation to authorize a new Special Use Permit to someone purchasing a facility, even when that facility has been authorized in the past. My main areas of opposition are as follows.

1.The Use of a Categorical Exclusion

In the Flathead National Forest's April 7, 2025 letter and the draft 2025 Operations and Maintenance Plan they provided indicated the services and activities to be authorized differ significantly from the services authorized in the expired permit. Further, the new operating plan mentions 'reconstruction' of the facilities, and this term was not a part of the prior Operating Plan. But 'reconstruction' is not defined in the operating plan. Without a clear and detailed definition of reconstruction, the public cannot be expected to understand what exactly the Operating Plan entails, and cannot comment accurately. This is particularly true when the permit has a 20 year term. The plan also mentions hosting of events of up to 200 people. This is significantly above the current capacity of the lodge or restaurant. They also mention year around occupancy, which again was not allowed by the previous permit. All of these intentions represent a significant departure from the the previous operations of the lodge and as such, the proposed permit authorization does not qualify for a Categorical Exclusion.

2.Documented Environmental Violations: Wastewater Treatment System

The current wastewater system serving the lodge has been found to be leaking at an alarming and unacceptable rate. And according to inspection reports, has been leaking with no attempt to resolve the issue for quite some time. This is a serious issue with direct implications for groundwater quality, water quality in the lake, and for the health of the ecosystem. The Clean Water Act clearly prohibits the discharge of pollutants into waters without appropriate monitoring and adherence to standards. The Flathead National Forest has said it doesn't have the resources to clean this system up and get it functioning again and has proposed the taxpayers foot the bill for the entire reconstruction of the system. Meanwhile, the dump station and the Bay campground loop have shown they can function adequately without the use of the wastewater treatment system. This means that the Flathead National Forest is asking the public to foot the bill entirely for a privately owned lodge the discharge its wastewater. No Permit should be issued while the wastewater system is in technical violation of environmental standards and without a clear plan to bring it into compliance.

3.Inconsistencies in the Intentions of the Current Applicant

Several times, the new owners of the lodge and applicants for the permit, Holland Peak LLC have stated that they do not intend for expansion at this time. However, they have also stated that the lodge will not be profitable if the operations are not roughly doubled. They have been unusually vague about their intentions for the lodge, despite being astute businessmen who typically wouldn't invest a dime unless they knew exactly how they were going to get it back. I understand the the submission of a Master Development Plan is potentially contingent on the issuance of a new Special Use Permit. However, given the evasiveness of the new owners intentions and answers to the public, I believe it is not prudent to issue a new permit at this time without more concrete details so the public can be informed.

4. Grizzly Bear Habitat and Corridor Disruption

Despite the fact that the current proposal does not seek to increase the number of visitors or the footprint of the lodge, this is typically the goal for a money-making venture. The lodge is located within a known grizzly bear corridor-a fact that should always be under careful consideration. I have commented such in my previous letter on the MDP from Powdr. The area provides critical connectivity for a threatened species whose survival depends on minimizing human conflict and habitat fragmentation. Increased tourism, vehicle traffic, and infrastructure development would exacerbate risks to this vulnerable population. I feel it appropriate to remind us all that, under the Endangered Species Act, the Forest Service has a legal duty to ensure federal actions do not jeopardize the continued existence of listed species or destroy or adversely modify their critical habitat.

Given the scope of environmental concerns and the level of documented public opposition, this project requires a full Environmental Impact Statement, not an abbreviated Environmental Assessment and certainly not a categorical exclusion. This is not the rebuilding of an outhouse. It is a major decision with long term consequences for water quality, wildlife, public access, and the beauty that is Holland Lake.

Please deny the permit transfer until all environmental violations are fully resolved. Reject any future expansion proposals at this location. Ensure public input for all changes.

Any plans need to address the combined impacts of the proposed annual operating plan, proposed 20-year resort permit, and reconstruction of the wastewater lagoons. They are all connected and would have cumulative effects on the lake, surrounding public lands, and the people who live and recreate in the area. I also request, given the severity of the previous omissions and procedural missteps, that a USFS Inspector General be summoned to review the process and procedures.

Sincerely,

Montana citizen and regular visitor to Holland Lake