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Comments: Flathead National Forest

650 Wolf Pack Way

Kalispell, MT 59901

April 29, 2025

Re: Holland Lake Lodge Special Use Permit Issuance Proposal

Attn: Anthony Botello, Flathead Forest Supervisor Anthony Botello, District Ranger Chris Dowling, and permit administrator Anthony Butterfield

Sent via: <https://www.fs.usda.gov/r01/flathead/projects/67937>

Please consider the following comments from Friends of the Bitterroot (FOB) of Hamilton, MT concerning the Holland Lake Lodge Special Use Permit Issuance Proposal. FOB is a local organization dedicated to protecting wildlife, wild places, and forest ecosystems. Many of our members have enjoyed the unique character of Holland Lake, the wildlife, and the surrounding area and plan to continue to do so in the future.

Two investment bankers from Park City, Utah have recently purchased the title formally owned by Christian Wohlfeil and have applied for a special use permit. Forest Service (decision-maker Forest Supervisor Anthony Botello) is not obligated to issue a new permit to whomever acquires title to the improvements. Authorizing a 20-year permit to unknown permittees without immediately requiring a Master Development Plan or a probationary period is not in the public interest.

The permittees have no experience with concessions or the hospitality industry. They are investment bankers not hoteliers. The goal of investment banking is to glean large profits from investments. The public made clear in the last Holland Lake go-around, that they did not want a high-end resort to replace the mom and pop, affordable lodge and cabins. Granting a permit to two investment bankers without a plan is not a forward thinking, long-term solution for the management of Holland Lake Lodge. The Flathead Forest should not consider authorization for more than three years with a Master Development Plan due at the end of those three years. With this scenario, the public would have plenty of time to get to know the new proprietors and weigh in on their ability to manage the property and their actual plans for the area.

There is no reference to the size of the project area in the scoping documents. There was a discrepancy discovered in the recent Master Development Plan proposal. The actual permit area is 10.53 acres, but the scoping letter for the Holland Lake Master Development Plan Approval (HLMDDPA) stated that the area is 15 acres (Exhibit A, p 1). Please be clear on what acreage this permit will encompass and provide high resolution maps. The maps in the HLMDDPA showed that the existing permit does not include the waste water system or the spray field. The original 10.53 acreage should be clear to both the pending permittees and the public. Forest Service must also explain how a future development plan on the original area can move forward without access to the waste water system or spray field. Who will be responsible for upgrading this system in the future? Information on waste water treatment wells is provided to show that the ground water is unaffected by the sewage leakage discovered in 2022. Project should provide information as to what was done to rectify this situation. Is this a permanent fix or a just get by for the time being repair. Who is responsible for this work now and into the future? How will it be funded? The public should be assured that no more leakage into the water table or lake will occur. Just seeing the magic solution of clean monitoring wells, does not explain what caused the leak, how it was repaired, if more repairs are needed, or if there is a possibility of more leakage.

According to the Bozeman Chronicle in 2024

The sewage system came under scrutiny last summer after it was revealed that the Forest Service failed to report a tear and subsequent 2022 repair in the lagoon's liner to the Montana Department of Environmental

Quality. The lagoon is about 1,000 feet away from the lake. The liner failure was uncovered in a public records request by the group Save Holland Lake.

Last August, DEQ ordered the Forest Service to study possible wastewater leakage from the lagoon; the Forest Service was granted an extension for completing the study, from September to November. The Forest Service reported late last year it found no impacts to groundwater.

The Missoula City-County Health Department also ordered the Forest Service to retroactively apply for a new permit for the system covering because of the latter's failure to report repairs. (Exhibit B)

Did the Forest Service acquire a new permit for the system as required? Was the torn liner fully replaced or just repaired? What are the chances for another tear? According to Botello, "The wastewater treatment system that serves part of the Forest Service campground, the RV dump station, and Holland Lake Lodge has been found to have issues and will not be operable in its current capacity this summer" (Ibid). What occurred to make it operable?

An update on the Holland Lake Lodge info page, the Forest Service states, "We have recently received a report from a private engineering firm regarding the wastewater treatment system. Our forest and regional engineering group are reviewing the report and determining next steps." It is premature to approve a 20-year permit when you have not yet determined the next steps.

Documentation offers no discussion of Extraordinary Circumstances which would preclude the use of a CE. This area provides habitat for several species protected by the ESA. Critical Canada lynx habitat surrounds the Holland Lake area. The presence of deep snow and snowshoe hare habitat support the recovery of Canada lynx and monitoring in the area has verified presence. Please provide a map of snowshoe hare habitat in the area as well as Canada Lynx critical habitat.

Holland Lake and Holland Creek are designated critical habitat for a distinct population of bull trout. Albeit a small population, it is genetically distinct to this area and fulfills a unique role. This population would be highly vulnerable to changes in the Holland Lake area, especially their natal spawning area in Holland Creek.

Holland Lake is a known nesting area for Loons. According to the Conservation Plan for common loons in Montana, "Loons are extremely territorial and sensitive during the nesting season. Disturbance of loon nesting areas by humans can cause annual nest failures and consequently affect long-term occupancy of lakes and population viability" Exhibit C, p 5).

Holland Lake is within a primary conservation area for grizzly bears. It offers connectivity for bears between multiple populations in the Bob Marshall, Mission Mountains, and the Rattlesnake. A recent op-ed (Exhibit D) by owner Christian Wohlfeil, discusses an 800-pound grizzly bear that appeared as an unexpected guest at a wedding. The Holland Lake Lodge that is located within the Big Salmon Bear Management Unit (BMU) in the Northern Continental Divide Ecosystem (NCDE) primary conservation area. A survey and assessment of all facilities managed for overnight use in the BMU should be included in analysis.

Wolverine are now a listed species and have been verified in the area. Myriad sensitive species are also present. Project documentation must consider the legally protected migratory birds and eagles that utilize the lake and surrounding area.

Presence of listed, proposed listed, sensitive species, eagles, and migratory birds demonstrates extraordinary circumstances that preclude a CE and mandate more analysis.

The lodge and cabins are under consideration for the National Registry of Historic Places. The petition was completed in 2020 by North Wind Resource Consulting at the behest of Christian Wohlfeil of Holland Lake Lodge to "assist with site management, maintenance, and improvements." At that time, no changes to the area were proposed. Contributing resources toward preservation according to the petition are "the lodge, a single-family residence (now a gift shop), four guest cabins, a barn, and a storage shed (p iv)"

In an article in the Montana Free Press (2022) Wohlfeil claimed, "Right now, the foundation of the lodge is crumbling, and we'd like to put it on an actual foundation and preserve it for future generations" (Exhibit E). What is the actual condition of the lodge? Is the foundation crumbling? Does it need repairs? Why isn't the current condition of the buildings included in the documentation? Repairs are allowed for safety in the permit. What extent of repairs are needed? Wohlfeil also claimed that he could legally rent out jet skis but he does not" (ibid). What is actually allowed in the permit vs what has been utilized in the past? Can the new permittees allow motors

and jet skis on the lake? What is the actual guest capacity allowed in the original permit vs what has been used in past years?

The operating plan allows "maintenance and reconstruction of buildings" to ensure safety and the "Operation and maintenance of the lodge portion of the FS owned Wastewater System." What does this entail and who is responsible for the costs of repairs to the Forest Service owned system? Will the taxpayers have to foot the bill? The lack of information concerning this permit is felonious. The Final Operating Plan for 2025 is not available for public review. The Forest Service has not even made the application for the permit available to the public. Proprietary information could easily be redacted from the application making it available for public scrutiny. There is no information concerning the actual footprint of the permit or who is held responsible to upgrade the waste water system if necessary. Necessary repairs to keep the lodge and cabins running safely, should be made available to the public. If the permittee's want to start renting by Memorial Day, they must have an idea of repairs needed. This should be included in scoping.

It was clear in the HLMDPA that a CE does not provide adequate analysis. This process is an attempt to kick the need for an EIS down the road after the permit is transferred. Do not bypass detailed analysis of effects to a popular public place and the habitat and wildlife that surround it.

Consider a probationary period that ends with a Master Development Plan or prohibit any expansion until after the 20 year permit is complete. Consider the local group working to purchase title to the improvements in order to preserve the area as it is which the public supports.

Your decision on this proposal should be to "benefit the general public and protect public and natural resource values." Not mandating a probationary period for an unknown unqualified permittee makes no sense. Issuing a twenty-year permit without requiring a Master Development Plan for five years does not benefit the public or protect resource values. The Flathead Forest should rethink this permit.

Thank you for considering our comments and please keep us informed of this project in the future.