

North Fork Preservation Association
P.O. Box 1602
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September 26th, 2022

To: Kurt Steele – Flathead Forest Supervisor, Kurtis.Steele@usda.gov
Chris Dowling – Swan Lake District Ranger, Christopher.Dowling@usda.gov
Michele Mavor – Project Leader, michele.mavor@usda.gov

Re: Holland Lake Lodge Facility Expansion Project

Dear Forest Managers;

The North Fork Preservation Association (NFPA) strongly opposes the proposed expanded development at Holland Lake Lodge with a large corporate partner, POWDR. Although NFPA typically focuses on issues pertaining to the North Fork of the Flathead River Valley, we are commenting on this matter because it represents an ongoing pattern of poor public notification and misuse of CE that is affecting activities throughout the forest. Our concerns are as outlined below:

1. A review of POWDR's website (<https://www.powdr.com/our-businesses>) shows mega developments which are in conflict with the historical use of Holland Lake Lodge and the surrounding area. The proposal indicates that almost 33,000 square feet of ***additional*** buildings would be constructed, substantially increasing the facility footprint and the recreational impact to the lake and the surrounding area. Additionally, as POWDR's current business model includes heli-skiing, similar activities with added impacts in future expansions of the proposed plan is a further concern.
2. Although the comment period was eventually extended, the initial period of 20 days, with notification just before a major holiday is unacceptable. This continues a concerning pattern of reduced public notification of Flathead National Forest Projects and suggests an intent to restrict public input. We request, that in the future, projects are noticed via regional and local newspapers, via social media and via email.

3. A Categorical Exclusion (CE) is inappropriate for this project; it merits a full environmental review as either an EA (Environmental Analysis) or an EIS (Environmental Impact Statement). A CE is described as “*Construction, reconstruction, decommissioning, or disposal of buildings, infrastructure, or improvements at an existing recreation site, including infrastructure or improvements that are adjacent or connected to an existing recreation site and provide access or utilities for that site. Recreation sites include but are not limited to campgrounds and camping areas, picnic areas, day use areas, fishing sites, interpretive sites, visitor centers, trailheads, ski areas, and observation sites.*” (36 CFR 220.6(e)(22)). What is proposed is a resort hotel which more than triples the number of accommodations at Holland Lake Lodge. In addition, the applicant proposes to expand the operating season to include winter months. This is not appropriate for consideration under a CE. By definition, (36 CFR 220.6(e)(22)), the proposed project does not meet the criteria for the granting of a CE. Furthermore, a CE fails to address the concerns outlined in number 4 below.
4. The proposed project will, in our opinion, adversely impact wildlife including multiple threatened and endangered species. These include grizzly bears, lynx, bull trout, and wolverines. The water quality of Holland Lake may be threatened by increased motorized boat traffic as well as increased public use, threatening the genetically unique population of bull trout which reside there. Impacts to elk from increased recreational trail use are documented to reduce herd reproduction. These collective impacts merit an EA or EIS for this project; we request the Forest proceed with such an analysis.

The character of the Holland Lake area is of significant and irreplaceable value and is under threat. To date the Project Comment/Objection Reading Room linked on the project page shows to date over 5,000 individual comments regarding this proposal, the majority of which are in opposition. The NFPA joins these thousands of Montanans in opposing the project as proposed.

Flannery Coats Freund, President

North Fork Preservation Association

