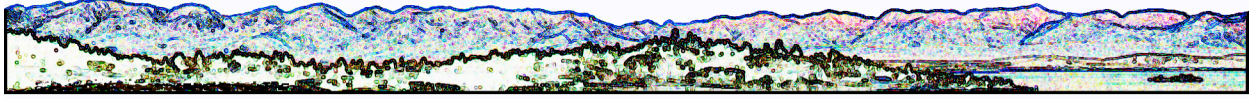


Swan View Coalition

Nature and Human Nature on the Same Path



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ph/fax 406-755-1379

April 28, 2025

Anthony Botello
Flathead Forest Supervisor
650 Wolfpack Way
Kalispell, MT 59901

Submitted via <https://cara.fs2c.usda.gov/Public//CommentInput?Project=67937>
and anthony.botello@usda.gov , Christopher.Dowling@usda.gov ,
gary.blazejewski@usda.gov

Re: Holland Lake Lodge Special Use Permit Issuance Proposal

Dear Supervisor Botello and others;

We hereby submit our second letter of comment in the above matter.

1. You have essentially provided the public no information from the Special Use applicant to review. Once all information relevant to this proposal has been posted on the online project page, please then initiate a scoping and public comment process for the preparation of an Environmental Assessment in order to adequately assess the impacts of all cumulative and connected actions and to determine whether an Environmental Impact Statement is required.
2. You have not provided Holland Peak LLC's application for the permit and the applicant has recently told the press that he does not want to discuss the application. [1]
3. You have not provided Holland Peak LLC's proposed 2025 Operating Plan and instead provided one drafted by the previous permit holder, which is irrelevant. [2]
4. The permit applicants late last year held public meetings and otherwise stated that, while they don't want a business footprint as large as that proposed previously by POWDR, the business needs to be expanded in order to be profitable. You have not provided a Master Development Plan for public review and have instead granted the applicants five years to develop one, so neither you nor the public has any idea where this business and permit is headed as you seek to grant it a 20-year permit to operate on public land. [3]
5. You have not provided a copy of the proposed Special Use Permit and its terms and conditions (not even with so-called proprietary information redacted).

6. You acknowledge that the failed wastewater system and sewage lagoon needs to be repaired for the Lodge to be functional at its historic level. Will the repairs be sufficient for a Lodge business expanded to be profitable in the eyes of the permit applicant? You and the public can't tell without seeing an MDP!

7. The previous owner of the Lodge business is selling because it has become unprofitable and is in need of substantial repairs. Now the new Lodge owners say they will need to increase the size of the business to make it profitable, yet you have not secured or simply choose not to divulge the details of what that expansion will be!

8. All aspects of the Lodge, repairs to and sizing of the sewage lagoon, the expansion of the Lodge business (including "a range of recreation opportunities in forest settings consistent with visitor expectations") must be assessed for their environmental impacts in an EA if not an EIS. The use of a Categorical Exclusion from preparing those documents in issuing this 20-year permit is inappropriate due to impacts to the non-Lodge recreating public and numerous resident threatened species that include grizzly bear, bull trout, lynx, and wolverine!

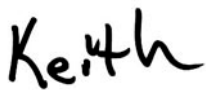
9. A posting of all comments submitted online must be shown in the project's online Reading Room so the public can see what others are saying about this proposal.

We appreciate the additional information you have posted to your project web page since our 4/11/25 letter. That information indicates the need for you to prepare an EA in order to assess the effects of all cumulative and connected actions relative to the proposed Permit and to determine whether a full EIS is required. Missing from that information, however, is essential information developed by the permit applicant as detailed above.

Once all information relevant to this proposal has been posted on the online project page, please then initiate a scoping process for the preparation of an EA in order to adequately assess the impacts of cumulative and connected actions and to determine whether an EIS is required.

Please start over, as described above.

Sincerely,



Keith J. Hammer
Chair

Sources

1. <https://flatheadbeacon.com/2025/04/09/as-new-owners-await-approval-to-buy-historic-holland-lake-lodge-flathead-forest-triggers-permit-review/>

2. Project File document "HLL FAQs April 2025.pdf"

3. https://missoulain.com/news/local/business/article_5469d770-6a35-11ef-9df2-4b40e3adfae9.html , https://missoulain.com/news/local/article_223ce2e2-76b0-11ef-99a8-dbc6ff159b6d.html , https://missoulain.com/news/local/article_cc2501dc-8d6b-11ef-8575-47389b1cc190.html , "Contract in place for Holland Lake Lodge Sale," 10/29/24 Daily Inter Lake, https://missoulain.com/news/local/article_544444fc-98b0-11ef-94e7-f723df479ec6.html , <https://flatheadbeacon.com/2025/04/09/as-new-owners-await-approval-to-buy-historic-holland-lake-lodge-flathead-forest-triggers-permit-review/>