

Save Holland Lake

January 13, 2023

Kurtis E. Steele
Forest Supervisor
Flathead National Forest
650 Wolfpack Way
Kalispell, MT 59901

Justin Sibley
CEO
POWDR Corporation
1794 Olympic Parkway, Suite 210
Park City, UT 84098

Christian Wohlfeil
Holland Lake Lodge Inc.
1794 Olympic Parkway, Suite 210
Park City, UT 84098

Dear Messrs. Steele, Sibley and Wohlfeil:

To assist in restoring public trust, we are writing to request that you promptly notify and disclose to the public any new special use application, Master Development Plan (MDP), or proposal to expand Holland Lake Lodge.

(We also ask that you immediately release the 2023 Holland Lake Lodge Operating Plan, which should have been finalized by Dec 31, 2022, and notify the public immediately of any decisions made on the status of the current permit and ownership.)

Since the Flathead National Forest (FNF) first proposed the “Holland Lake Lodge Facility Expansion” (HLL) project on September 1, 2022, the public involvement process has been fraught with abbreviated public involvement and environmental analysis procedures, misinformation, and obfuscation.

That is why, on November 21, 2022, the FNF notified Christian Wohlfeil, an employee of POWDR, and POWDR Corp. itself via a letter that it was returning the plan (which aims to triple the size of Holland Lake Lodge on Holland Lake in western Montana’s Swan Valley) because of “inaccuracies and inconsistencies” in the project’s master plan and proposed use. To note, nearly 99 percent of the 6,500 scoping comments opposed the proposed massive expansion.

POWDR spokeswoman Stacey Hutchinson subsequently said that POWDR would resubmit a new proposal that would not compromise on scale, and the corporation would “share more of those details in the coming weeks.”

Due to the fact that the Flathead National Forest had the previous MDP in its possession for 10 months before it was unveiled to the American public (and apparently knew of a transfer of lodge management to POWDR in October 2021), we are requesting transparency from the FNF and to release, without delay, any new proposal details as they are presented to the Forest Service.

The immediate release of any new proposals regarding HLL would give ample time for the public – owners of the public land on which the expansion project is proposed – to properly assess the plan and determine whether it is in the public interest.

As you know, Save Holland Lake has asked the Forest Service to deny any proposal to significantly expand Holland Lake Lodge because it would fail to satisfy the initial and second-level screening criteria of the USDA Forest Service Special Use regulations.

Problems with the previous application included:

- Initially limiting public comment to a three-week period (beginning over Labor Day weekend) even though the FNF had knowledge of the MDP for many months
- Inappropriate intention to utilize a categorical exclusion (intended for small projects) for a large project with extraordinary circumstances, such as being within the Primary Conservation Area for grizzly bears and designated critical habitat for bull trout and adjacent to designated critical habitat for Canada lynx
- Erroneous information regarding the size of the permit area
- Inconsistent information about the proposed season of use
- And vague responses to questions regarding whether the FNF had applied the screening criteria of the 36 CFR 251.54(e).

These actions have severely eroded public trust and confidence in the FNF’s commitment to serving the public interest rather than the financial interests of a few people seeking to profit from excessive commercial development of National Forest System lands with exceptional wildlife and wilderness values.

Given the intense public interest in the proposed expansion, we believe it is in the public interest for the Forest Service to promptly notify and disclose to the public any new application, MDP, or proposal to expand Holland Lake Lodge. While we are pleased the FNF ceased evaluation of the previous proposal, we are deeply concerned that POWDR Corp. plans to resubmit another proposal of the same massive expansion and the FNF will repeat its previous behavior of unreasonably withholding the proposal from the public.

The public requires sufficient opportunity to comment and review any proposal submitted. To date, the FNF has refused to commit to providing that public notice and disclosure, further eroding the public's trust and confidence in the Forest Service.

Please be open and transparent and release to the public any new project details as soon as they are provided to the Forest Service.

Sincerely,

Save Holland Lake members

Lucy Dayton, Pete Feigley, Jacole Johnson, Bill Lombardi, James Morrison, David Roberts, Grace Siloti, Cheri Thornton, Jack Wade

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Cc: Leanne Marten, Regional Forester, Northern Region, USDA Forest Service
Ben South, Deputy Regional Forester, Northern Region, USDA Forest Service
Missoula County Commissioners Josh Slotnik, Juanita Vero, Dave Strohmaier