

# *Swan View Coalition* Nature and Human Nature on the Same Path



3165 Foothill Road, Kalispell, MT 59901

[swanview.org](http://swanview.org) & [swanrange.org](http://swanrange.org)

ph/ fax 406-755-1379

Date: October 5, 2022

To: Curt Steele – Flathead Forest Supervisor, [Kurtis.Steele@usda.gov](mailto:Kurtis.Steele@usda.gov)  
Chris Dowling – Swan Lake District Ranger, [Christopher.Dowling@usda.gov](mailto:Christopher.Dowling@usda.gov)  
Michele Mavor – Project Leader, [michele.mavor@usda.gov](mailto:michele.mavor@usda.gov)  
Leanne Marten – Regional Forester, [leanne.marten@usda.gov](mailto:leanne.marten@usda.gov)

Re: Holland Lake Lodge Facility Expansion Project – Comments #2

Dear Folks;

Please accept these, our second set of comments, into the public record in the above matter. The further along this charade proceeds, the clearer it becomes you need to back up and start the scoping process again – but this time with clear and accurate records and a 60-day public comment period as the first step in the development of a Draft Environmental Impact Statement that also covers the cumulative impacts of your entire recreation and Special Use Permits (SUPs) programs.

## **POWDR Holds no Special Use Permit for Holland Lake Lodge**

The Joint Venture between POWDR and Christian Wohlfeil is being foisted on the public like an Abbot and Costello “Who’s on First” routine. It is clear from the vast majority of the comments submitted to the Project Reading Room that the public is not amused, sees through this charade and opposes this mega-expansion. Wohlfeil and his SUP are being used to put a smiley face on this corporate expansion when what is required is for his SUP to be terminated and for POWDR to start from scratch with its own application for an SUP. The facts show that POWDR, Wohlfeil and the Forest Service (FS) are trying to instead shoehorn this mega-expansion in under Wohlfeil’s SUP.

As pointed out in our 9/8/22 comments, the 4/15/22 Master Development Plan (MDP) was not available on the Project web site until 9/6/22, five days after you first asked the public to comment on the Project. Nor did the Project web site provide the current Special Use Permit or its several amendments until even later. Nor did the Project web site provide MDP Appendix B and C until even later, denying the public prompt access to the “Technical Memorandum – Holland Lake Wastewater System” and “Holland Lake Lodge – Determination of Eligibility [for historic designation]” until even later.

The 9/1/22 Scoping Letter is inadequate and fails to provide a coherent description of the existing situation or the expansion that is proposed. The Scoping Letter notes that the Forest Service (FS) has “accepted” the MDP, but it fails to note that POWDR is listed

as the primary contact for the MDP even though POWDR currently has no Special Use Permit (SUP) for the Holland Lake Lodge or its grounds and improvements.

Nor does the Scoping Letter make it clear that the existing SUP cannot be transferred to POWDR, even if current owner Christian Wohlfeil is a willing seller. The current (5/26/17) Wohlfeil SUP makes it clear that a transfer of title or any change in control of the business entity “shall result in termination of the permit” and that any new owner or controller “must submit an application for a special use permit. The Forest Service is not obligated to issue a new permit to the party who acquires control.”

### **The Scoping Letter is Fatally Flawed**

The Scoping Letter is fatally flawed in describing this Project as a simple expansion under an existing SUP when the MDP states clearly on page 2 that “the future owner [will be] POWDR Corp.” The Scoping Letter is instead an evasive smoke and mirrors scam that violates every rule and regulation in the book! Nor does the Scoping Letter even accurately describe the Wohlfeil SUP.

The Scoping Letter references an “existing 15 acre permitted area” but the Wohlfeil SUP says “this permit covers 10.53 acres.” The FS has failed to provide the amendment to the SUP that increased it from 10.53 to 15 acres. Instead, the Scoping Letter provides Figure 2, a map showing a Holland Lake Lodge Permit Area on the order of what appears to be some 30 acres. The MDP, at 16, states “the wastewater lagoon, piping and sprinkler area will be surveyed and added to the existing 15-acre permit area.” What is the true size of the permit area and is that permit one issued to Wohlfeil or to POWDR, given that the Project would turn management of the entire wastewater treatment system over to the permit holder?

Nor does the Scoping Letter mention that Wohlfeil hired consultant North Wind, who found that both the existing Lodge and the Lodge property are eligible for listing in the National Register of Historic Places. Nor does the Scoping Letter make clear that 6 of the 8 structures contributing to that eligibility would be torn down under the Project.

### **The Forest Service is Making Irreversible and Irretrievable Commitments of Resources That Will Prejudice its Decision, in Violation of NEPA**

The FS is making irreversible and irretrievable commitments of resources to implement this Project rather than firstly examining whether this is the right Project for this historic and sensitive area. Both the Scoping Letter and the MDP state that two new water supply wells are needed to implement the Project. Many days after scoping was initiated, the FS got around to posting an 8/22/22 Amendment #2 to the Wohlfeil SUP, authorizing the drilling of the “two new wells behind the existing storage shed.” This is an unlawful action being taken before the relevant decisions have been made and the appropriate environmental analyses conducted. What will be the effects of these two wells and their water withdrawal on the recharge of the aquifer fed, in part by Shoestring Creek, which we are told is essential to fish in that part of the lake? We ask

that Amendment #2 be rescinded immediate so that it does not prejudice the final decision nor harm the environment.

Equally inappropriate, Brian Stewart is a signatory to this SUP Amendment #2, even though he works for POWDR and the email he provides on page ii of the MDP is [bstewart@powdr.com](mailto:bstewart@powdr.com). Must we repeat again that POWDR has no ownership or interest in the current Wohlfeil SUP and that the SUP must be terminated if POWDR is to take control of or title to Holland Lake Lodge? It is clear the FS is illegally taking actions before the required NEPA public review, interagency consultation, and environmental review of a broad range of reasonable alternatives in an EA or EIS. It is also doing so before the current SUP has been terminated and before a request for an SUP has been received from POWDR.

Standard language in the Wohlfeil SUP makes it clear “The Forest Service is not obligated to issue a new permit to the party who acquires control.” FS behavior, however, makes it clear it is here to do the bidding of POWDR. POWDR states on page 1 of its MDP that it wants the Project approved using a Categorical Exclusion (CE) from the preparation of an EA or EIS and the FS proposes exactly that. POWDR needs two new water wells to implement its MDP and the FS authorizes the drilling of those wells, as mentioned above, before it has even initiated public review of the proposal.

The FS totally failed during its internal review of the MDP to make necessary changes in the proposal, to cancel the Wohlfeil SUP and require a new SUP application by POWDR, and to confirm that use of a CE is inadequate for the process. This has caused irreparable damage as the public now sees the FS as the lapdog of POWDR.

POWDR displays its limited understanding of the history of the Holland Lake Lodge area in its MDP (pages 6-8) yet therein proposes to tear down a number of structures that Wohlfeil’s consultant said contribute to the property being eligible for inclusion in the National Register of Historic Places. As mentioned above, the Scoping Letter says nothing about this. It instead simply says that “National Historic Preservation Act Section 106 reporting and consultation would be completed” later on. It then prematurely proposes the razing of historic structures! Where is a NEPA alternative that would retain all of the structures contributing to historic eligibility? There is none and will be none if a CE is used. Arguably, such an alternative would be considered in an EA or an EIS.

Flathead Forest Plan Standard FW-STC-REC limits increases in developed recreation areas, which include “cabin rentals” and “guest lodges” to “one increase above the [2011] baseline . . . in number or capacity per decade per bear management unit.” (Forest Plan at 60). Through what public process has the Flathead determined that the public needs an increase in recreation capacity in this bear management unit and that Holland Lake Lodge, above all other sites, is where that increase best occur? It hasn’t, pure and simple.

If even needed in the first place, might not the public be better served with an increase in the capacity of the Holland Lake Campground, for example? By automatically selecting POWDR to receive the “rights” to increase developed recreation in this bear unit, the Forest Service has again unlawfully prejudiced its decision and selection of

alternatives. A wide range of alternatives must be developed and examined in an EIS to determine whether there is a need to increase developed recreation in this bear unit and, if so, to determine whether that increase can be accomplished without harm to grizzly bear and other species of ESA listed and non-listed wildlife, and to determine where that increase best serves the public and does the least harm to the environment.

### **The Scoping Letter Fails to Discuss Cumulative Effects, Other SUPs in the Area, or How SUPs Often Lead to Incremental Expansion of Facilities, Services and Impacts**

The Scoping Letter makes no mention of other SUPs operating in the Holland Lake area, let alone discusses the cumulative effects of their combined services and impacts. No mention is made of Swan Mountain Outfitters or the fact that the FS is still considering an expansion of their permitted outfitting area in the Swan Valley that would include the Holland Lake area. (See <https://www.fs.usda.gov/project/?project=60675> ). Nor does the Scoping Letter mention that POWDR intends to “Partner with local guides and outfitters to offer guests more activities” (<https://www.hollandlakefuture.com/> ). It would appear to be no coincidence that among the very few Project Reading Room comments supporting POWDR’s expansion plans are Swan Mountain Outfitter owners Patrick and Joanne Tabor, given they are seeking an expansion in their SUP area and stand to benefit from business with POWDR and Holland Lake Lodge.

Nor does the Scoping Letter mention that the FS has issued an SUP to Great Northern Wilderness Guides that includes trails leading from Holland Lake to Holland Falls, Upper Holland Lake and vicinity (<https://www.fs.usda.gov/project/?project=62041> ). Nor does the Scoping Letter mention that Great Northern Wilderness Guides hopes to “Every year . . . try to add another permit holding location” (<https://whitefishpilot.com/news/2022/aug/31/great-northern-wilderness-guides-aims-make-backcou/> ).

Nor does the Scoping Letter mention that the FS has issued Flathead Outdoors an SUP that “will authorize guiding service of e-bikes, e-dirt bikes and dirt bikes” on the Swan Lake, Tally Lake, Hungry Horse/Glacier View, and Spotted Bear Ranger Districts,” including Holland Lake (<https://www.fs.usda.gov/project/?project=62075> ).

Nor does the Scoping Letter mention that Adventure Cycling Association’s Great Divide Mountain Bike Route runs by Holland Lake and up Roads 9558 and 9814 to then join with Lolo NF’s Rd 4370 (<https://www.struck.us/BikePics/BikeStories51-2.html> ). Nor does it mention that ACA in 2022 was granted an SUP to guide 10-24 people on this stretch of the GDMBR (<https://www.fs.usda.gov/project/?project=62077> ). Nor does it mention that this is also a groomed snowmobile route in winter ([https://www.fs.usda.gov/Internet/FSE\\_DOCUMENTS/stelprdb5339150.pdf](https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5339150.pdf) ). This groomed snowmobile route begins at Owl Creek Packer Camp. Given our experience with the Flathead’s SUP program, it is likely the Flathead would issue an SUP for guided snowmobile trips on this groomed snowmobile route, as it did for Snowbike Nation for the 2021-22 winter season on groomed snowmobile routes in the Crane Mountain and Skyland areas (<https://www.fs.usda.gov/project/?project=61128> ).

Nor does the Scoping Letter mention that all of the above SUPs have been or are proposed to be issued by the Flathead NF using Categorical Exclusions from the preparation of an EA or an EIS. Just as it proposes to do with the Holland Lake Lodge mega-expansion! This means there has not been nor will there be an adequate assessment of the cumulative effects of all these activities and SUPs in conjunction with the Lodge expansion Project, a Project which essentially promises to partner with these guides and outfitters to increase use of the area.

The Scoping Letter also fails to explain how SUPs, once issued, are likely to be expanded to include greater areas, greater facilities, and greater services – often without adequate public notice. The Wohlfeil SUP stands as one case in point. It has been amended to authorize the drilling of two more water wells with no public notice whatsoever, as explained above. The Project is proposed to greatly expand the facilities and services on the Holland Lake Lodge grounds as though it all fits within the parameters of the Wohlfeil SUP, or as though it is simply a matter of amending the Wohlfeil SUP.

The Big Mountain SUP initially did not allow for a restaurant atop the mountain, now it does and there is a restaurant up there in prime grizzly bear habitat. When the Big Mountain SUP area and facilities were expanded significantly to the north, it was conditioned on limiting development in the south-facing Hellroaring Basin so that grizzly bear habitat security would be maintained to offset the additional impacts to the north (Big Mountain Expansion EIS). In 2020, the Flathead NF nonetheless approved two chairlifts and service roads for Hellroaring Basin, which decreased grizzly bear habitat security there (<https://www.fs.usda.gov/project/?project=55012>). This is nothing short of a trail of broken SUP treaties!

Izaak Walton Inn operates a groomed cross-country ski trail system near Essex, MT, under an SUP issued by the Flathead NF. It went through an expansion process in 1987 and then, in 2017, the Flathead NF authorized Izzak Walton Inn to also provide a skier shuttle service to near the Great Bear Wilderness Border without any public scoping and over the protests of Ranger Davies' own staff! Davies persisted and granted Izaak Walton Inn permission on 11/29/17 to use its big snow groomer machine to shuttle ski clients up Dickey Creek to near the Wilderness boundary. In Davies' own words ""The [Izaak Walton Inn] shuttle service on the Dickey Creek Road would facilitate as many as 30 additional skiers per day, who are likely to travel further into the Great Bear Wilderness or into areas adjacent to the wilderness area." This was done, of course, using a Categorical Exclusion even though in the habitats of grizzly bear, lynx and wolverine and with other "extraordinary circumstances."

In a final example, the Flathead NF in 2021 proposed to build four rental cabins with a 6-person capacity each, construct a playground, drill a groundwater well, and extend the season of use to include winter months at the Bunker Park Campground adjacent to the Bob Marshal Wilderness (sound familiar?). It proposed to use a CE and argued this would not be an increase in developed recreation capacity at the Campground on the Spotted Bear Ranger District. (<https://www.fs.usda.gov/project/?project=59643>). Lo and behold, the Flathead did not disclose that it was in fact considering building more rental cabins on up to 29 sites on that District alone – until the public found out about it via a FOIA request. (See the attached 9/18/20 Dani Southard "notes from Flathead

cabin discussion”). That Project was put on hold only due to the diligence of a public that caught the Flathead NF in the middle of a big lie.

The take-home message in the above examples is that the Flathead NF is all too willing to do the bidding of its line officers, SUP applicants and SUP holders, often over the objections of its own staff and using devious methods. It relies wholeheartedly on Categorical Exclusions to avoid a public disclosure of the environmental and cumulative effects of its SUP program and to deny the public the right to formally Object to the SUP. It is clear that, once a permittee (or the FS itself) gets its foot in the door with an SUP, the permitted area, facilities and services will increase over time. With these facts at hand, those reviewing the Lodge expansion Project can see this as nothing other than a large recreational development corporation (POWDR) trying to jam its foot in the door through Wohlfeil’s SUP. The Flathead NF is apparently by nature incapable of denying POWDR its wishes and seeing that the public good is served instead.

The Flathead Forest Plan, at C-78, lists a number of potential recreation management strategies. Among them is “Complete a needs assessment to determine the need for new outfitter, guide, and livery services on the Forest outside of designated wilderness.” This the Flathead has not done and is instead going about its recreation development in an unlawful, piecemeal manner involving many dozens of SUPs.

Moreover, page 145 of the Forest Plan lists as #6 of its Desired Future Conditions “The portion of the Seeley Clearwater connectivity area from Condon south to the boundary of the Swan Valley geographic area . . . provide[s] habitat connectivity for wide-ranging wildlife species (e.g., grizzly bear, Canada lynx, and wolverine) moving between the Swan and Mission Mountain Ranges” (parenthesis in original). How will this remain true in the face of this Project, the increases in recreation it will produce in the larger area! Where is the “hard look” NEPA requires to determine whether it will remain true or not? (See our description above about the already existing SUPs and recreational uses in the area).

### **The Project Would Have Significant Environmental Impacts and Requires an EIS**

The impacts from this Project reach far beyond the 15-acre “permit area.” As described above, the Project intends to promote recreation in the area. It would do so not only through the expansion of facilities in the permit area, but through outfitter and guide services that expand ever outward. Dr. Chris Servheen, retired FWS Grizzly Bear Recovery Coordinator and now President of Montana Wildlife Federation, addresses impacts to wildlife in his comments on this Project. He also addresses the Forest Plan standard that allows only one increase in developed recreation capacity per bear management unit per decade. He also makes clear on page 4 that “human activities” have negative impacts on “grizzly bears, elk and other species,” not just “motorized” activities. We incorporate by reference Dr. Servheen’s 9/28/22 comments. Moreover, we argued in our Objection to the revised Forest Plan and still maintain that it is not possible to allow these incremental per-decade increases in developed recreation while simultaneously claim to be maintaining the 2011 baseline levels of on-the-ground grizzly bear habitat security conditions.

We briefly made the case in our 9/8/22 comments that use of a CE for this Project is unlawful given the existence of extraordinary circumstances that include “the native habitats of bull trout, grizzly bear, lynx, wolverine, deer, elk . . . and the extreme level of public controversy this proposal has generated (approaching 6,000 public comments in the Project Reading Room, almost all of which are against the proposal and the use of a CE). Others’ comments help flesh out this case against use of a CE and other violations of law. We hereby incorporate their comments by reference: 1) Arlene Montgomery on behalf of Friends of the Wild Swan, 2) Hillary Eisen on behalf of Winter Wildlands Alliance, 3) Steve Kelly on behalf of the Council on Wildlife and Fish and Alliance for the Wild Rockies, 4) John Meyer for Cottonwood Environmental Law Center, 5) Kristine Akland on behalf of the Center for Biological Diversity, and 6) Michael Garrity on behalf of Alliance for the Wild Rockies, Center for Biological Diversity, and Council on Wildlife and Fish.

We ask that you flatly reject this proposal for expansion of the Holland Lake Lodge and prepare an EIS with a wide range of alternatives that address the cumulative effects of all recreation and SUP programs on the Flathead National Forest. Then see where a proposal for expanding or improving Holland Lake Lodge does or does not fit within that context.

In closing, we must add that condescending statements by the Forest Service do not help it navigate this public controversy. In his 9/14/22 press release, Supervisor Steele implies that it is the public that is confused about his proposed use of a CE and that the public just doesn’t understand that even a CE provides for “environmental analysis.” Rest assured we and others understand the difference between the type of often checklist analysis that goes along with a CE compared with the broad range of alternatives examined in an EA or EIS. We also know the difference between: a) being given at least 60 days to comment on a carefully ordered DEIS along with having the public right to file a formal Objection to the FEIS and decision and b) being given a few weeks to comment on a hodgepodge of conflicting documents, being provide no alternatives to compare the proposal to, and being denied the right to file an Objection with higher-ranking FS officials when a decision is reached.

Supervisor Steel’s comment, however, is likely outclassed by his Public Affairs Officer, Tami MacKenzie. She is quoted in the Montana Free Press as saying of their use of a CE: “It causes an inflammatory reaction, but the reason we do that is to get that reaction and to get those comments.” (<https://montanafreepress.org/2022/09/12/proposal-to-expand-holland-lake-lodge-raises-community-concerns/>) That sounds like a surefire way to get the public to feel like it is just being manipulated by the government. Shouldn’t the government instead be leading the public toward a shared understanding of the proposal via a legitimate NEPA process? We can only hope, of course, that Ms. MacKenzie subsequently takes the time to read each and every one of those public comments that number nearly 6,000 in the Project Reading Room.

Sincerely,

Keith

Keith J. Hammer  
Chair

Attachment: 9/18/20 Dani Southard's "notes from Flathead cabin discussion"

**From:** Dani Southard

**Sent:** Friday, September 18, 2020 5:30 PM

**To:** Snelson, Scott I -FS; Steele, Kurt -FS; Connolly, Shannon B -FS; Frisbee, C - FS; Turk, Janette L -FS; Danczyk, Gary M -FS; Kies, Julie - FS; Dwallien@nationalforests.org; Marlee Ostheimer; mselig; Spencer Cordovano; kdibari@nationalforests.org; Marymitsos

**Cc:** Dani Southard

**Subject:** notes from Flathead cabin discussion

All-

Thank you to everyone for a good call on Wednesday about the Flathead cabin concept (we'll find a better name for this...) Attached are some notes from our discussion including the list of those who were on the call. Please take a few minutes to look through the notes and let me know if you have any edits. I'm also attaching the resources Scott circulated prior to the call.

I'll work with Janette to get a time on our calendars in early November for a follow up call. Thank you for bringing this idea forward to the NFF. We're looking forward to seeing what we can collectively make of it.

Have a wonderful weekend.

**Dani Southard**

Manager, Northern Rockies - National Forest Foundation

Boise, ID

Mobile: ~~208.720.0957~~

[dsouthard@nationalforests.org](mailto:dsouthard@nationalforests.org) | [nationalforests.org](http://nationalforests.org)

## Flathead Connected Cabin Discussion

Wednesday, September 16<sup>th</sup>, 2020

### Attendance:

Kurt Steele, Forest Supervisor, Flathead NF  
Scott Snelson, District Ranger, Spotted Bear, Flathead NF  
Shannon Connolly- Recreation, Spotted Bear RD, Flathead NF  
Chris Prew, - Recreation Program Manager, Supervisors Office, Flathead NF  
Janette Turk- Forest Partnership Coordinator, Flathead NF  
Julie Kyes - Wood and Biomass Utilization Coordinator, Region 1 and 4  
Dayle Wallien, Conservation Partnerships Director - National Forest Foundation  
Marcus Selig, Vice President, Field Programs - National Forest Foundation  
Spencer Plumb, Conservation Finance Program Manager – National Forest Foundation  
Karen DiBari, Conservation Connect Director- National Forest Foundation  
Dani Southard, Northern Rockies Program Manager  
Marlee Ostheimer, Conservation Partnerships Manager – National Forest Foundation

### Next Steps

- NFF discuss further internally
- Forest fly an RFP to get a better look at cost
- NFF to set up another team call in 6 weeks or so to discuss priorities over the next two years
- Begin conceptualizing linked system?
- Gary Danczyk is speaking about this concept (today) at the national level; will mention the Forest is talking with NFF about this

**Overview:** In order to adapt to changing use recreational pressures and manage anticipate or ongoing resource concerns, including but not limited to grizzly bear human interactions, the Flathead National Forest is looking to develop several cabin rental opportunities on the Spotted Bear Ranger District.

**There are currently 29 sites that have been identified as potential opportunities on the Spotted Bear RD.**

There is potential to expand the cabin system to other areas on the Forest and even throughout the Montana region to create a hut to hut system.

**NFF question: Actual cost per cabin unit and per pod? 50K seems low for a cabin; does this include build on site or just the structure?**

- Julie suggested that an RFP could be used to identify different open source models and could be a good basis to determine cost and feasibility of standardizing a design that could work to create a connected network. Forest could note preference to small diameter wood material.
- Current thinking is that cabins would be very basic to accommodate 4 people and placed on top of helical piers rather than hardened foundations, to make structures easier to move if needed and minimize ground disturbance.
- 500 square foot shell (rectangular building with a loft) for \$50,000. There may be a need to consider electricity for some locations. Trying to stay away from plumbing to keep maintenance costs low.
- In addition to recreational cabins, could be used as a template for employee housing or admin sites

**NFF question: what is the timeline and realistic feasibility of production of cabins from Wooden Haus? What are the alternatives (if any) if this is not a viable business to purchase from?** Wooden Haus is likely 2 years out from a production standpoint. Suggestion that NFF connect with Pat Clark directly. RFP could identify additional options.

**NFF question: How would these cabins be maintained over time? There could be significant costs involved in this.** Maintenance model could be kept in-house with FS or externalized through partnership with nonprofit partner similar to 10<sup>th</sup> mountain division in Co. half of cabin rental fees would be directed to a fund to maintain and replace structures overtime, as needed.

**NFF Question: Has a map been developed to depict where cabins would be located or potential for a connected network?** Spotted Bear – 6 sites of four cabins each are doable in the near term. These locations have been mapped out.

**NFF question From a NEPA standpoint, what (if any) would be the hurdles?** Only allowed one (new) development per 10 years per bear management unit. Cabin site selection will need to be strategic. Could replace old sites (campsites) with a cabin. Overall probably positive for the bears (hard side units). Huts could be viewed as temporary, allowing some flexibility from a NEPA standpoint at the developed rec sites that are truly Admin in nature. Helical pier foundation, not dug foundation, keeps structures temporary.

**NFF question: Could a connected system be established on the Flathead first and then extended to other Forests? Have there been any discussions with other Forests about this?** There could be interest at a national level for a national design standard. There is interest on other districts and forests for an interconnected cabin system, (Seeley RD, Kootenai NF, for example) for both rental cabins and employee housing. Seeley Lake interested in a winter hut system.

**NFF question: How many years to get this lifted off the ground? (Grandest vision) – 10-year: CDT hut system.** With simplified with standardized design and/or stimulus bill, could be a 5-year plan.

**Funding:** No support through GAOA this year, but potentially in future years.

#### **Where NFF can help/what is our role?**

NFF could support the project by adding capacity: funding, contracting, collaboration, bringing partners in to build support, supporting the development of a standalone maintenance non-profit (if needed). We need to have a better idea of the phased proposal

#### **Additional info on 10<sup>th</sup> Mountain Division**

The 10th Mt. Div Hut Association is a nonprofit that builds, restores, maintains, and manages the entire hut system. The Association is a nonprofit org that operates under special use permits and manages all aspects of the huts, from building and maintenance, to stocking with firewood and toilet paper, to managing reservations and payments. By all intents and purposes, the huts are the Association's, and the FS simply owns the land on which they are located.

The model has been incredibly successful. The organization is very well funded (from user fees and donations), and the huts are impeccably maintained. The only challenge is that the huts are so popular it can be difficult to get reservations. <https://www.huts.org/>

Association's ED, Ben Dodge – NFF has connections to Ben.