Swan View Coalition Nature and Human Nature on the Same Path



3165 Foothill Road, Kalispell, MT 59901 swanview.org & swanrange.org ph/fax 406-755-1379

Date: September 8, 2022

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

Re: Holland Lake Lodge Facility Expansion Project

Dear Folks;

It is very clear in the third paragraph of your 9/1/22 press release that you have got this project all wrong: "Improvements would provide a family-friendly destination with the modern comfort and convenience that visitors, today, expect, while retaining the integrity of the location." People wanting to enjoy a rustic lodge or the natural amenities of a backcountry lake don't come to the mega-resort proposed here. This is not what most people expect to find in the Swan Valley. And replacing the trees with buildings and parking lots hardly will retain the integrity of the area.

Simply put, the Forest Service is doing the bidding of a large out-of-state development corporation, POWDR, catering to the rich but trying to make it sound down-home. We just reviewed a random sampling of the 486 public comments already in the Project Reading Room and found not a single comment in support of this Project. They instead rightly understand that this Project will destroy the rustic and natural character of the area and will cater to the rich at the expense of the average citizen and their public resources.

We ask for a 60-day public comment period on the scoping documents you have released, followed by an in-depth Draft Environmental Impact Statement, another public comment period on the DEIS (as required by law) and then a Final EIS. You are proposing a mega-expansion resort here in the native habitats of bull trout, grizzly bears, lynx, wolverine, deer, elk, ... all Extraordinary Circumstances that preclude your proposed use of a Categorical Exclusion from the preparation of an EA or EIS. And, if you'd just look at the comments in your Project Reading Room, you'd see this Project is already highly controversial and for that reason requires the preparation of an EIS.

Here is just a short list of the reasons you must back up and start again on the public review of this horrible Project:

1. The Holland Lake Lodge Master Development Plan was not made publicly available on the Flathead's web site until September 6. The public needs plenty of time to review this 36-page document and the Forest Service's 16-page "scoping" document. 2. The scoping document is dead wrong to presume this mega-development can be "categorically excluded" from the prior preparation of an Environmental Assessment or Environmental Impact Statement. Such shortcuts are intended for constructing an outhouse or a tool shed, not a destination resort!

3. Before Big Mountain was allowed to expand its ski area in 1995, the Flathead rightly prepared an Environmental Impact Statement on whether it should be allowed under that ski area Special Use Permit.

4. Before the Flathead allowed the Big Mountain ski area to expand ski lift facilities in Hellroaring Basin in 2019, it prepared an Environmental Assessment to be certain it should be allowed under the Special Use Permit.

You know what you need to do here in terms of NEPA and public involvement, and it is not taking the Categorical Exclusion shortcut. Please distance yourself a bit from POWDR and do what is right for the American public, whose lands you are charged with managing.

Sincerely,

Keith

Keith J. Hammer Chair