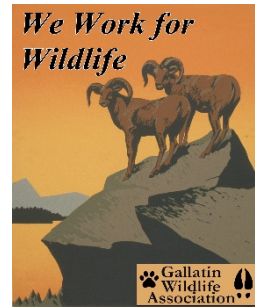


GALLATIN WILDLIFE ASSOCIATION

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Gallatin Wildlife Association (GWA) is a local, all volunteer wildlife conservation organization dedicated to the preservation and restoration of wildlife, fisheries, habitat and migration corridors in Southwest Montana and the Greater Yellowstone Ecosystem, using science-based decision making. We are a nonprofit 501 (c) (3) organization founded in 1976. GWA recognizes the intense pressures on our wildlife from habitat loss and climate change, and we advocate for science-based management of public lands for diverse public values, including but not limited to hunting and angling.

I am writing on behalf of our group Gallatin Wildlife Association to object to the proposal for expanding Holland Lake Lodge with no environmental impact statement or environmental assessment. The subject area, adjacent to the Bob Marshall Wilderness in Montana, is extremely sensitive habitat for endangered and threatened species including the grizzly bear. Expanding a recreational development in this habitat is a bad idea, compounding existing impacts to critical grizzly bear habitat in an area that has a current history of bear attacks on visitors and tourists alike. See attachment for details.

Nancy Ostlie

Attachment:

On behalf of Gallatin Wildlife Association, please accept this letter as you consider approval of the proposed facility expansion of Holland Lake Lodge. The Forest Service website states that "Holland Lake Lodge, Inc. Master Development Plan details building and infrastructure improvements, enhancing the visitor experience, within the current permitted area."

General objections:

Enhancing 'visitor experience' is not the primary responsibility of the Forest Service. Although the agency is chartered to provide for 'multiple use' of federal lands, **accommodating a private out-of-state business interest without regard to other impacts on the resource is unacceptable. And there would certainly be impacts to the natural setting, the wildlife and the biodiversity of plants, water features, birds and animals in the vicinity.**

One of the founding members of Gallatin Wildlife Association, Joe Gutkoski, had an epic experience elk hunting at Holland Lake many years ago, spending a week alone in the Bob Marshall Wilderness after entering by Holland Lake. He was able to kill an elk

after much perseverance, but had to surrender the elk to a resident grizzly bear who challenged him. The opportunity for a citizen to have a wilderness experience like this one, could be lost if further human encroachment occurs in the area. Even more importantly, **grizzly bears have limited habitat ranges available in the Northern Rocky Mountains, and it is important that this imperiled species is afforded all the undisturbed habitat we can allow it.**

The current owner said that his buyer “needs enough income structure here to be a viable, healthy business,” Wohlfeil said. “And their [POWDR’s] plan to spread out on this permit area would give them, or whomever else is here, that income structure.” The “need” for a commercial profit by an out-of-state business interest must be carefully considered against the irreversible losses to biodiversity that would result. I would suggest the tradeoff is not anywhere close to worthwhile to the state and the nation.

Specific objections:

Please note that the general objections above are the most relevant to our objection. The specifics regard the way this proposal is being mishandled by the agency.

1. The Holland Lake Lodge Master Development Plan was not made available to the public until September 6. There is inadequate time for the public to review and comment on the proposal by the deadline of September 6, or even by October 7, as the current deadline stands. Sixty days is a minimum allowance for public review. I note that the public has commented overwhelmingly in opposition to the project: as of today, there are 2,941 objections on record to the project, for big reasons, not just reasons related to the process, which is inadequate.
2. The practice of invoking a “categorical exclusion” for this project is absolutely unwarranted. This exclusion was intended when it was devised to permit, for example, the painting of an outhouse, not for timber sales and resort development on public lands.
3. In the past, the Forest Service has rightly conducted Environmental Assessments and an Environmental Impact Analysis to consider the potential impacts of such a Special Use Permit.
4. An article in a Montana newspaper writes:
“The Forest Service document explaining the expansion says, “Based on a preliminary assessment, intentions are to categorically exclude the proposed project from documentation in an environmental impact statement or an environmental assessment.” Categorical exclusions are the fastest version of an environmental review under the [National Environmental Policy Act](#) and are not as rigorous as an environmental assessment or an environmental impact statement. Tami MacKenzie, public affairs officer with the Flathead National Forest, said that while categorical exclusions may result in quicker action, an environmental review of the proposed project would still be required. MacKenzie explained that once the Forest Service thinks a categorical exclusion may be an option, it’s added to the scoping document to draw comments from the public. “It causes an inflammatory reaction, but the reason we do that is to get that reaction and to get those comments,” MacKenzie said. After an environmental analysis that looks at impacts to wildlife and aquatic habitats, the Forest Service will determine whether to approve the project.”

The description above of the Flathead forest personnel saying that the Service purposely is proposing the project under a categorical exclusion, just to raise a public outcry, is in no way honoring the intent and letter of the law, requiring a proper environmental review.