

Caitlyn Wade

October 5, 2022

RE: Holland Lake Lodge Facility Improvement & Expansion #61746

To: U.S. Forest Service, Swan Lake Ranger District

Please accept my comments into the public record in the above matter. I am a Montanan, a student of public land law and policy, and a visitor to public lands, including at the proposed project location. My comment today serves two purposes: first, to object to the Forest Service's proposed usage of a categorical exclusion for the Holland Lake Lodge expansion plan and second, to object to expansion altogether.

The Forest Service has decided that Holland Lake's expansion fits into a predetermined categorical exclusion pursuant to NEPA. As a reminder to you, Forest Service, your own definitions consider a categorical exclusion to be "categories of actions that normally do not have a significant effect on the human environment" (40 CFR § 1504.1(a)). Take note of "normally" and "effect."

The term "normally" provides for exceptions to categorical exclusions in situations where proposed actions have "extraordinary circumstances" affecting it that weren't considered when the Forest Service determined that the category of actions would not have a significant impact on the human environment. The Forest Service has a mandate to "evaluate the [proposed] action for extraordinary circumstances" (40 CFR § 1504.1(b)). Such evaluation is lacking here.

"Extraordinary circumstances" are defined to include: a proposed action that "is known to or expected to":

- 1) have potentially significant environmental impacts...cumulatively over time
- 3) affect federally listed threatened or endangered species or their critical habitat
- 4) significantly affect... property listed on or eligible for the National Register of Historic Places...
- 5) significantly affect...significant fish or wildlife habitat...
- 7) have a significant effect on the pattern and type of land use (industrial, commercial, agricultural, recreational, residential) or growth and distribution of population including altering the character of existing residential areas, or may not be consistent with state or local government, or federally-recognized Indian tribe approved land use plans or federal land management plans...
- 8) cause significant public controversy about a potential environmental impact of the proposed action...

10) conflict with federal, state or local government, or federally-recognized Indian tribe environmental, resource-protection, or land-use laws or regulations.

The Forest Service has grossly overlooked their mandate regarding the evaluation of “extraordinary circumstances” in this proposed Categorical Exclusion, as all aforementioned definitions regarding extraordinary circumstances are pertinent in this project location. The Forest Service should reasonably expect cumulative environmental impacts coming from this Lodge’s new partnership with POWDR, “an adventure lifestyle company” known for high impact luxury tourism. The Forest Service should reasonably expect effects on lynx and grizzly bears, both endangered species that live in the project area. The Forest Service should reasonably expect effects on the type of land use and growth and distribution of population in such a way that would alter the rural backbone of the Seeley-Swan region due to the lodge’s desired expansion that would include winterized use and a partnership with POWDR. And the Forest Service should reasonably expect significant public controversy about the environmental impact, as that is happening before your eyes right now.

Please now consider your regulatory definition of “effects or impacts” which includes direct, indirect, and cumulative effects that relate to ecological, aesthetic, historic, cultural, economic, social, or health effects (40 CFR 1508.1(g)). It would be unfounded for you to finalize this project as a categorical exclusion as that would mean that it does not have any of these “effects.” Such a decision would be arbitrary.

I now urge you to consider your duty as our public land agency to follow the statutory and regulatory mandates that govern your decisions, such as NEPA, and recognize that a categorical exclusion on the Holland Lake Lodge expansion is a daft misuse of your discretion. This project, at minimum, requires an EA pursuant to NEPA.

As stated initially, the second purpose of my comment is to object to the Holland Lake Lodge expansion altogether, even if an EA or EIS is undergone as it should be. The Swan Lake Ranger District and Holland Lake Lodge sit in a gorgeous, rural, ecologically significant location of vast importance for many in the region. I recognize that this region, and Holland Lake in particular, have seen a great rise in daily visitors throughout the last several years, and that the owner is bound to profit greatly from this project. In the Master Development Plan, it is said that the “primary goal [of expansion]... is to enhance visitor experience... [by giving visitors] access to a higher quality and wider range of accommodations.” This implies that expansion enhances the experience for visitors, when in reality, many of the commenters on this proposal have acknowledged that expansion will degrade their experience. Holland Lake is on the precipice of a vast Wilderness area. Many visitors come to wild places like this, as Stegner once wrote, for “sanity as creatures, a part of the geography of hope.” I understand that the owner hopes to capitalize on this. I urge you not

to be ignorant to the destruction that could occur here. It is in the stillness and solitude of wild, beautiful places like Holland Lake, *away* from the development of man-made structures and “high quality accommodations” that people can hear the still small voice inside of them and be reminded of their purpose on earth. Developing this place further is sure to irrevocably degrade this place that we love. So I end the second part of my comment with an appeal to you, the Forest Service, and to the owners and operators of Holland Lake: please do not approve or complete this expansion and aid in the ruining of this wild place.

“My heart is moved by all I cannot save:
So much has been destroyed

I have to cast my lot with those
Who age after age, perversely,

With no extraordinary power
Reconstitute the world.” Adrienne Rich

Thank you for your consideration. I now submit my comment to the public record for Holland Lake Lodge Facility Improvement & Expansion #61746.

Caitlyn Wade