

Holland Lake Lodge Comments

Forest Supervisor Steele:

Thank you for the opportunity to comment on this proposal for upgrades at Holland Lake Lodge.

I am retired from the US Forest service. In my 32 year career, I served as the Lands Program Manager on the Lolo National Forest in Region 1, and on the Shoshone National Forest in Region 2. My duties in that capacity included the administration of numerous lodge/resort permits issued under the Term Permit Act of 1915.

I have many concerns regarding this proposal. First, is that the scope of the potential impacts to wildlife, water resources and changes to the character of the landscape in this area are being vastly under stated by the proponent. This concern is amplified by the apparent lack of transparency on the part of the Flathead National Forest, as I understand requests for documents such as the preliminarily biological assessment and many other documents requested by others have not been released.

As many others have said by now, to possibly consider a Categorical Exclusion as the proper National Environmental Policy Act (NEPA) document for a project of this scope, which will triple the capacity of this lodge, involve YEARS of construction which will be incredibly disruptive to Grizzly Bears, Lynx and other wildlife species, not to mention the recreating public at the nearby Holland Lake Campground.

Proper public participation cannot take place if the Flathead National Forest moves forward utilizing a Categorical Exclusion to document the impacts of this proposal.

No time frame for the build out of this project is available anywhere I can find on your website. The Master Development Plan has virtually no information on this. At what point in this project proposal will you require a more detailed year, by year plan, which would allow for a more reasonable assessment of the impacts? At what point do you plan to release the documents that your professional biologists have prepared?

Documents that I am requesting, as soon as possible include:

- The Biological Assessment
- Copy of documentation of the screening process for this proposal under 36 CFR 251.54
- Copy of documentation of the Cost Recovery Category for this proposal under 36 CFR 251.58.

Additional questions I have at this point is who is the current holder of the Special Use Authorization, and was the proper process followed for any transfer of ownership that may have already occurred? Forest Service Handbook 2709.11, Chapter 40 requires a process of the evaluation of financial, and technical qualifications of an applicant for a resort permit issued under the Term Permit Act. The documents must be reviewed by qualified personnel at the regional office level. Has this happened? It appears the Flathead National Forest may have already transferred the permit to new ownership, and if so I would like to be informed of how and when this review took place.

I have many other concerns, and am saddened by the lack of trust that I and so many others are feeling regarding this proposal. There are so many very dedicated public servants working to do their best to protect our public lands under the Forest Service motto "Caring for the Land and Serving the People". I know because I have worked with them. Please don't continue to

undermine whatever public trust remains in your agency. Release the information, so we know what is really going on.

Thank you,
Jennifer Watson
Retired Forest Service Employee
Co-Leader, Great Old Broads for Wilderness, NW Montana Chapter