

## Continued Incorrect Information on Project Acreage

Please accept the following addition to my comments posted on 10/6/22.

The proposed Master Development Plan made public on 9/6/2022 repeatedly misstates the current Special Use Permit (SUP) acreage. U.S. Forest Service personnel have continued to amplify this misinformation through the afternoon of 10/6/22. The following paragraphs demonstrate the amplification of the misinformation.

On 9/21/22, "Citizen A" asked, ***"Could you please tell me when and why the permitted area increased from 10.53 acres to 15 acres?"*** The written response from Christopher Dowling, the U.S. Forest Service Swan Lake District Ranger in the Flathead National Forest, stated, ***"The original permit boundary survey was conducted in 1924. Until a proposal was brought forth, the Forest Service did not do a review of the boundary. The Forest Service found several written acreage additions captured in historical permit documents. The written area was translated into modern Geospatial Information Systems in March 2022 and found the area to be 15 acres. However, due to changing personnel in the permit administrator position, a permit amendment was not completed. The Forest Service will be fixing this oversight."*** This answer was never corrected.

On 9/27/22, "Citizen A" wrote a follow-up question: ***"Thank you, Mr. Dowling. Could you please share or further instruct me as to where the public can view the referenced historical permit documents, as well as the most recent permit? Also, could you please inform me as to what the cost of the permit was for 10.53 acres and what the cost is/will be if the permit is officially amended to 15?"*** No reply was received.

On 9/28/22, "Citizen A" wrote the following email directly to Flathead National Forest Supervisor Kurtis Steele: ***"Mr. Steele: Could you please explain when and why the permitted acreage for Holland Lake Lodge increased from 10.53 to 15? Could you please share the documentation that supports this increase? And could you please share the cost of the lease at 10.53 acres and what the cost is/will be if the permit is properly amended? Thank you."*** No response was received, but this message should have alerted Mr. Steele directly of the issue (if he still was not aware of it at this late date).

On 9/29/22, I traveled to the U.S. Forest Service Ranger Station in Bigfork to view historic maps. I was shown the 4/11/22 Proposed Permit Area document submitted by the WGM Group. This document shows the proposed 19.38-acre resort area (14.16-acre Permit Area plus 5.22-acre Septic Area). All other documents that I viewed, including the 1990 map attached to the current SUP, show smaller areas. I submitted an additional request, including a Freedom of Information Act (FOIA) request, to the Northern Region coordinator to verify that no other documents exist.

After Flathead National Forest Supervisor Kurtis Steel publicly admitted this mistake on 10/5/2022 at the Condon Public meeting, I sent an email to Shelli Mavor and the Northern Region FOIA coordinator to ask them to confirm this mistake in writing. On 10/6/22, I received this email reply from Shelli Mavor: ***"This process would review the proposed project which expands the HLL area by the lake by 3.63 acres, increasing to 15 acres from 10.53 acres. The current project does not include the effluent lagoon at this time, that could be proposed at later time as shown in the master development plan. However the decision was made to include the discussion of HLL, Inc potentially taking over maintenance and operation of the wastewater facility to be transparent with the public (Scoping Package p3 – 2(e)) and***

*to analyze the environmental effects. However, adding the acreage of the effluent lagoon would be discussed in the future. It would either occur under an amendment to the existing permit OR a new special use permit specifically for the lagoon. Until further notice, the Forest Service retains full responsibility to maintain and operate the effluent lagoon."*

Specifically, much like  $1+1 = 2$ , **10.53 acres + 3.63 acres = 14.16** acres. There is no 15-acre number anywhere in the documents provided to date.

**I urge you to reject the proposed Master Development Plan based on (1) incorrect information submitted by the applicant and (2) the U.S. Forest Service's continued sharing of misinformation to the public until the day before the comment period closed.** Note the 15 acre confusion persists in comments added on the afternoon of 10/7/2022 (See Gunderson and others)

If the applicant were to reapply, please provide the Public an adequate period to comment on accurate information.

My open FOIA requests that have not been fulfilled and restrict my ability to fully assess the project include the following:

#### **Holland Lake Lodge (HLL)**

1. Documents and plats showing the extent of HLL's **proposed** SUP, dated 4/11/2022 or later. I would like to receive an electronic copy of this proposed SUP, preferably a CAD file or a scalable pdf document. The proposed SUP is referenced on **WGM document Sheet 1, Dated April 11, 2022, WGM Project Number 210118. Plotted 3/11/22. Contact Melissa Matassa-Stone** (e-mail included in FOIA, but hidden here)
- The feasibility study prepared by WGM group in Feb 2021 and the **Phase 1 ESA prepared by WGM** for the project referenced in the proposed Master Development Plan. **Contact Melissa Matassa-Stone** (e-mail included in FOIA, but hidden here) **I have a 9/25/22 email from Melissa Matassa-Stone that confirms that these reports exist. The email comments from M. Matassa-Stone are pasted below.**
  - o **The Phase I ESA (the doc referenced in section 7.1.1 of the MDP) - we have not been authorized to release it. I know you have asked the Forest Service for it, but we were advised to direct you again to them so requests are consistently routed through that one point of contact.**
  - o **Force Main Routing - to be honest, I have not had a free moment to dig into the report beyond the plate you shared. I'm hoping to get caught up on that front this weekend. If there is specific information that you are looking for or a specific question, I would suggest requesting it through the Forest Service as well. Then if that request comes to us through that channel, we should have it readily available.**