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I write to comment on the Holland Lake Lodge expansion proposal.

As a precursor to my comments, I provide the following to you as background. On a personal level, over the past 40 years I have hiked and floated hundreds of miles with friends and family within the Bob Marshall wilderness complex. I have spent scores of days with friends and family on and around Holland Lake itself, hiked the trails that emanate from it and those that lead from it into the wild country that is its backdrop. I have visited Holland Lake lodge many, many times over the past 40 years, for dinners, lodging, an occasional scotch at the bar and weddings. My ties to this area - and my understanding of it's ecological, social, cultural, historic and community values run deep.

On a professional level I have spent my entire career prior to retirement 8 years ago working to protect and conserve Montana as well as our nation's great wild places and natural, national treasures so that all citizens and future generations can enjoy these special places forever. My stints include 15 years as Vice President of the National Parks and Conservation Association, 5 years as Executive Director of the Montana Wildlife Federation, and several years working for U.S. Senator Max Baucus on public land issues in Montana - including efforts to protect and conserve critical areas in and around the Bob Marshall complex.

I offer this background simply to set the foundation for why I offer the views below on this proposed development.

First of all, the USFS has vastly erred in its decision to treat this proposal under the NEPA category of a Categorical Exclusion and in doing so opens itself up to challenge. Categorical exclusions are designed to address minor impacts from minor individual projects - constructing/deconstructing a fishing pier, a toilet, a boat landing, etc. The cumulative impact of the POWDR proposal is extensive. By more than doubling the current footprint the development would impose enormous, new public commercial pressure to the area. Additionally, the proposal raises a host of direct ecological, historical and cultural concerns and issues of high significance and public interest that simply cannot be adequately addressed through the categorical exclusion process.

NEPA guidelines require that the possibility of direct and significant impacts to endangered species, water quality, soundscapes, fisheries and other public users necessitate thoughtful and careful analyses and professional reviews and studies before the USFS moves forward on any decision, and certainly not a decision guided by a perfunctory categorical exclusion review.

Additionally the USFS would do well to understand that Holland Lake and it's surrounding environment - and Holland Lake Lodge as a historic structure - hold a cherished place in the hearts and minds of countless Montanans as well as citizens across the country who have ventured to the area. There is no greater testimony to that fact than the rapidly escalating uproar occurring right now from the general public in opposition to this project - as proposed. This strong and expanding public interest, combined with the prevailing ecological, social and cultural rationales mentioned above, underscore the necessity for a deeper NEPA/EIS-guided impacts analysis.

Additionally, the fairness and priorities of the USFS in its assessment of this development come into question. I have been privileged to know folks who have homes at Holland Lake, and as such am aware of the rigid nature of the USFS rules regarding any improvements that may - or may not - be allowed to their structures. Yet for this proposal, that entails a doubling of commercial capacity, a wastewater treatment facility to handle the new use

loads, a new restaurant, greatly expanded parking lot, and associated buildings are given cursory analyses by USFS while homeowners appear to face significant bureaucratic obstacles to minor changes on their plots.

Over my lifetime while in Montana I have watched as place after place has seen its unique and wild character compromised or lost thanks to over use and over-development - aided by poor decisions made by public agencies overly influenced by politics and economics. Holland Lake Lodge sits on public ground - ground that belongs to all of us. The USFS can institute any number of choices as it looks at the long range use of this publicly owned property. It could simply decide that the area shouldn't have a commercial presence once the current lease is over. It could decide that the present imprint is plenty large and that any future for the area should be managed to a similar size. But to cavalierly exclude this enormous expansion from significant planning, public review, and cumulative impact is almost beyond comprehension.

The impacts, pressures and demands on Holland Lake, the lands and wildlife around it will be cumulative, and degrading. This is one of Montana's special places and should not be relegated to the growing history of poor public land decisions made in the face of pressure from a large corporation from Utah seeking to turn this rustic and historic place on the edge of our nation's first wilderness into a playground for the wealthy and a destination resort.

I urge the USFS to conduct a much more thorough review of this project through a complete Environmental Impact Statement.

Thank you

Tony Jewett