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Comments: To whom it may concern:

The following comments pertain to the proposed Holland Lake Lodge Facility Expansion project.

The intent to categorically exclude the proposed project from documentation in an environmental impact statement or an environmental assessment is absurd. The current proposed actions stated in the Master Development Plan (MDP), there will be massive changes happening to the permit area, such as demolition of existing buildings, reconstruction of existing infrastructure, construction of new infrastructure, upgrades to facilities, etc. The environmental, cultural, recreational and economic impacts associated with this action are required to be properly analyzed, address and mitigated, which would require at minimum documentation through an environmental assessment (EA) review. An environmental impact statement (EIS) would be most appropriate to address the effects of this project as it allows for a more quantitative analysis, rather than just a qualitative analysis as would be conducted with an EA.

Although the MDP states that grizzly bears, a federally listed species, have never been seen in the vicinity of the Holland Lake Lodge, this project is located in the Northern Continental Divide Ecosystem's Recovery Zone habitat for grizzly bear. Thus, there is large potential for the surrounding area to support grizzly bear. Additionally, lynx, also a federally listed species, are known to occur in the area. Many streams within the Flathead National Forest and likely within the vicinity of the project area support westslope cutthroat trout, a species of concern in Montana. Although the project will not be directly removing any habitat from these species, there will likely be affects to these species and their habitat through the proposed expansion and increased use of the area following the completion of the project, such as increased noise, road use and sedimentation.

I understand the need to improve and rehabilitate the current accommodations and facilities at Holland Lake Lodge in order to maintain the use of the lodge and the public's access to the recreational opportunities in the area. However, I do not believe that an expansion of the lodge and its facilities of the size will be able to retain "the resource integrity and spirit of Holland Lake". Currently, the area is frequently used by local Montanans as a relatively easily accessible recreation site in an area that is still relatively undeveloped and untouched, which is the way I believe most Montanans prefer it. Even with the proposed new trail from the lodge, the proposed project will ultimately increase the recreation use and density of people in the Holland Lake recreational area, thus decreasing the user's experience and serenity of the area. Established trails within the surrounding area will also likely increase in use, which will inevitably degrade and congest trail systems for local users. Degradation of trails can lead to increase sedimentation sources, affecting at-risk westslope cutthroat trout populations. Increased congestion on trails will inevitably lead to increased trash and human litter in wild areas, attracting bears to the area and causing more human-bear conflicts. This often causes a bear to become too comfortable in urban areas, leading to putting the bear down to protect human safety. Understandably, the proposed project may have many cumulative effects on the surrounding area that deserve to be analyzed properly.

Another indirect effect of the proposed project will be the increased road use and traffic on highway 83 and surrounding highways as non-local guests attempt to drive to the lodge. Increased road use will likely lead to increase sedimentation sources, damage to the roads and increased risk of accidents.

I do not believe that POWDR, the out-of-state multimillion-dollar company behind this proposal, cares for the recreational experience of local Montanans. The current ski resorts that they own and operate across North America are NOT affordable to the average family. Not only will the proposed project encourage more out-of-state tourism to the region, which Montanans already dislike as it congests their recreational areas (although

understandably, Montana is beautiful and everyone deserves to see it), the new lodge will likely not be affordable to the average Montana family! As stated in the MDP, the design goal of this project "is to provide family-friendly destination". How is POWDR planning to make the lodge affordable and therefore accessible by average Montana families? Will there be discounted rates for in-state Montanans trying to stay at the lodge? This has become a major issue for Montanans who cannot afford to compete with out-of-state wages.

Furthermore, I do not believe that a multi-million dollar company like POWDR will stop at just the expansion of the lodge. As owners of numerous ski resorts throughout North America, what would stop them from developing a massive ski resort in the Flathead National Forest? Would it be possible for POWDR to apply for a permit to develop a new project like this if they wanted to? What restrictions are in place to prevent a massive conversion of Flathead National Forest land into a commercial ski resort? I personally would strongly disapprove of a future development project such as this, as would other Montanans in the area, which would further make recreation in the local area inaccessible and unaffordable for the average family.

Thus, I strongly request that the two items stated in section '1.1 Request For Approval' of the MDP be modified from their current state. In particular, I request that the USFS request a new MDP from POWDR that modifies the proposed actions to an improvement of the Holland Lake Lodge, but not an expansion of the lodge from its current capacity and include a stipulation in the MDP to guarantee affordability at the lodge through discounted rates for Montana residents. Additionally, I am requesting the Flathead National Forest conduct a full EIS that would quantitatively account for all potential impacts, including the ones I've stated, of the proposed project.

I appreciate the opportunity to comment on this proposal.

Sincerely,  
Emilia Grzesik