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Comments: I am writing to object to the proposed expansion of the Holland Lake Lodge facility without conducting an environmental impact statement (EIS) or an environmental assessment (EA). More precisely, I am objecting to the FS attempt to list this project as a categorical exclusion (CX) under the National Environmental Policy Act (NEPA). First, I would like to mention the mere fact that the forest service, the federal entity whose mandate is to sustain the health, diversity, and productivity of the Nations' forests was trying to rush this project through without proper allotment for public comment is a travesty that will have blowback on many industries that responsibly harvest natural resources on public lands for years to come. In your actions, you have further eroded the public trust in a system of checks and balances that has historically failed the state of Montana. Please do better!

Below I have categorically listed all the reasons this project does not qualify for a CX under NEPA. Extraordinary resource conditions clearly exist at this Site that will be impacted by the proposed action, these conditions warrant further analysis and documentation in an EA or and EIS. However, I would like to make a broader statement, and a plea for common sense. In my chosen career I consult for the mining industry. From start to finish, on average it takes 10-20 years to permit a new mine in this country. It takes 2-7 years just to permit the expansion of an existing mining operation. Today, its almost impossible to permit a new min in the State of Montana. Miners today face an uphill battle when it comes to permitting, because of an onerous antiquated system that needs updated, and horrible regulatory failures in the past that have left the state and the forest service, and all the citizens of Montana holding the bag for millions of dollars in unfunded reclamation. But the miners of today have new methods and new ways for doing it right, but they can't because our citizens do not trust the process. And they don't trust the process because of games like this! There is no doubt that we need to update our NEPA policies to be more efficient, less costly, and less onerous process. But to attempt to circumvent the process all together with regulatory legalese in a culturally sensitive, environmentally important habitat is not only inappropriate, its irresponsible.

36 CFR 220.6 states that a proposed action may be categorically excluded from further analysis and documentation in and EIS or EA only if there a no extraordinary circumstances related to the proposed action. This expansion clearly does not meet this criteria for a CX, I have listed all the many reasons that I could think of below:

- 1) the proposed action is not listed as one of the categories provided in 7 CFR part 1b.3
- 2) the proposed action is not listed as an exclusion in 220.(d) or (e)
- 3) Due to an increase in human/ wildlife interaction, and a change to year-long occupancy, the proposed action has clear impacts to federally listed threatened and endangered species which include the grizzly bear, bull trout (endemic to Holland Lake), whitefish (endemic to Holland Lake), canada lynx, and the cutthroat trout, and the piping plover. Many of these species are federally listed and therefore an EIS should be required. Federal regulations require these impacts be quantified.
- 4) Holland lake is within the migratory flight path and is an observed stop-over location and nesting habitat for many migratory birds. Therefore impacts as applied to the federal migratory bird treaty act, with specific impacts to birds, their nests, or their eggs applies.
- 4) Enhanced consumption of natural resources such as groundwater in a potentially adjudicated basin demands an EIS. Protecting the rights of downgradient senior water right holders and aquatic life in the swan valley is critically important.
- 5) Impacts to flood plains, wetlands, and municipal watersheds is listed in 220.6.b.1.ii as resource conditions requiring an EIS, clearly construction and installation of fiber optics cables and other infrastructure upgrades along the riparian corridor requires and EIS.
- 6) Proximity to the Bob Marshall Wilderness Aras must be considered under 36CFR 220.6(b)(ii).

I believe when making the CX determination, that priority must be given to the increase in population to the area, and the year-round occupancy. These two changes that will occur do to implementation of the project clearly preclude the use of CX. Simply stated, the proposed action and the potential effect on Montana's natural resources, habitat, and wildlife demonstrate that extraordinary circumstances related to the proposed action exist, and that warrant further analysis and documentation in an EA or an EIS.

So be better, and do the right thing! Conduct an EIS and quantify the impacts.