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Dear USFS representative,

I am a local property owner writing to express my opposition to the proposed development as it stands on Holland Lake USFS lease land, where the Holland Lake Lodge currently operates. I also wish to acknowledge that ours and the federal land in question stands in the aboriginal territories of the Salish, Kalispel, Kootenai, Blackfeet, and Gros Ventre peoples.

My husband and I own deeded-land adjacent to Holland Lake (120 Alpine Dr.) and have been spending time at Holland for 30 years. We waited for many years to find property we could afford in the area because we knew just how special the lake is. There are very few lakes that offer to the general public what Holland Lake does: an opportunity to recreate on, in, and around a lake that seems wild and pristine due to its lack of development, clear waters, lower levels of noise and light pollution, and diverse wildlife populations.

I believe it is logical to argue that the following are worthy of consideration:

- 1. GRIZZLIES and the ESA Section 7(a)(2): Last year the US Fish and Wildlife Service determined that Carolinegrizzly bears should maintain their protected status under the Endangered Species Act. It is well-established that grizzly bears occupy the Holland Lake area, as evidenced by data shared by Montana FWP and other scientifically-supported organizations. Anecdotally, I have neighbors at Holland Lake who have captured images of grizzlies on their webcams. The Swan Valley-Condon Area Plan (12.06.2018) housed on the Missoula County website mentioned the extensive use by grizzly bears of the Upper Swan Valley as they cross from the Missions to the Swan. They also remind us that "the grizzly is a threatened species under the Federal Endangered Species Act (ESA). The grizzly bear and its daily and seasonal travels will continue to be an issue in any land subdivision in the planning area..." According to the FWS.gov website, the USFS is required, under federal law, to "consult with the U.S. Fish and Wildlife Service (Service) when any project or action they authorize, fund, or carry out may affect a listed species or designated critical habitat. The consultation process can vary depending on the complexity of the project or action." Has there been Interagency Cooperation to determine that the USFS has ensured that this project does not "jeopardize the existence of any listed species?"
- 2. USFS ROLES and RESPONSIBILITIES: Other than ensuring that federal law is being carried out in all policies and procedures (as mentioned above in Grizzlies and the ESA,) the USFS's job is to secure and protect "the American public's rights, title, value, and interests in its national forests and grasslands and authorizes a variety of uses on those lands to meet the needs of present and future generations." This includes protecting water, air, soil, and natural resources; smart approaches to climate and sustainability issues; preventing loss of native plant and animal species and controlling invasive species; restoring and protecting nature from degradation and destruction; maintaining healthy forests, etc etc.. Providing access* to recreational activities is one of many responsibilities. Because the property is on lease land and belongs to the public, local voices should have a significant impact on the determination of next steps.

*"Public access" should be defined (for example, a helicopter pad increases access, but is that what the USFS and the general public are seeking?)

- 3. A fun PLAYGROUND or SACRED spaces? POWDR considered the lake first and foremost a profitable "playground." Full stop. Many of us consider the lake habitat, a valuable natural resource we desire to protect, and a place for quiet communing with nature. There is a huge difference in approaches to development between these two values. As the federal agency in charge of managing our public lands for the benefit of the public, I see a large disconnect. The outpouring of concern by locals wanting to protect the lake's natural state reflects this disconnect.
- 4. POPULATIONS BEST SERVED: As the FS considers expansion of "public access" to recreational activities on our public lands, for whom are they advocating? Is it the local public? Tourists? The average Montanan (in terms of salary,) or those few locals who can afford to pay hundreds of dollars a night to rent a cabin? Has the population that POWDR's project is designed for been under- or over-represented in other projects throughout MT? What factors and rubrics do they use to determine who is best served? Is it appropriate for the USFS to prioritize what the general public would like in their backyard or what POWDR needs to develop a for-profit business that does not increase access to the average member of the public? Perhaps, like the campgrounds, the USFS should take on the Holland Lake Lodge to be run by a concessionaire at lower prices. Perhaps more campsites should be added in place of the lodge? We need time and opportunities to answer all of these questions.
- 5. OTHER WILDLIFE: People care about protecting our wildlife. Have appropriate governmental and private agencies been consulted to determine the extent this project may have on other wildlife populations? Loons, eagles, black bears, elk, fish, bats, snakes, and a multitude of other animals share this space. The snorkeling to the west of the lodge is some of the best on the lake. We know that human traffic can have a significant impact on such populations; has this been considered with integrity so that we can protect or properly mitigate such concerns? As outlined in the USFS Mission Statement, this project requires that the USFS proceed in a way that carefully considers the balance between public demands and protections of natural resources (ie. wildlife, water, nature) in order to meet the needs of present and future generations. More than ever people are beginning to realize the incredible value in Montana's wild spaces, and are motivated to protect them into the future, even at some personal cost. Does the USFS process reflect these values? Many places in the world are "taking back" wild spaces to protect wildlife at great public expense (Spain's Marina Isla de Valdecañas is a great example;) now is the time to pause and consider.
- 6. AIR QUALITY: the dust from road traffic is absolutely horrendous even with current usage. Last year my husband and I used hundreds of dollars of our personal funds in partnership with Missoula County to help mitigate the impacts from dust on the USFS public road bordering our property to the north. This road is frequently used by people headed to the private lease cabin sites, the Owl Creek trailhead, Owl Creek cabin rental, and Packers' campground. The dust has a visible impact that extends all the way to the lake and far beyond our property. Combined with the dust generated by traffic continuing on to the Holland Lake campgrounds, Falls trailhead, and Holland Lake lodge, there is often an existing haze that hovers over the lake in late summer between rains. Has the impact of this dust on people, plants, and animals been studied and considered before we add even more traffic?
- 7. LIGHT POLLUTION: The light pollution is currently minimal as there are very few developments along the lake. This allows for night-time star gazing from the lake and along the shore, a truly magical experience. Adding more structures to the lake will have an impact that should be studied. Bats, for example, are a critical part of the ecosystem and help us cut down on Holland's famous mosquito populations; bats are sensitive to light pollution. Have the impacts of more night-time lights on the animals who live there been considered, especially since that would now be year-round?

VIEWSHED: Currently the ability to enjoy the lake and feel like one is in nature rather than in a subdivision is

threatened. Adding any more development to the shoreline will have an impact and change the feel of the lake. This value should be considered.

- 8. GROUND WATER QUALITY: Shortly after purchasing our property a few years ago we abandoned the old, illegal septic, rented a porta potty, and currently are having a new septic system installed. We limit the use of chemicals on the property by hand-pulling weeds whenever possible. We use biodegradable soaps and pack out waste. This is all to protect our groundwater and the animals who live there. We would like to know if the impacts on groundwater of such a large project have been studied.
- 9. NOISE POLLUTION: We prefer to enjoy the lake when it is tranquil; this means waiting until motor boats are off the lake and we can paddle or swim without the noise of a motor. We are concerned that more boat docks and an increase in out-of-state users with a different set of values and education surrounding watercraft usage will have a great impact on the lake. Have the impacts of more jet skis and wake boats on fishing, wildlife, and shorelines been considered?
- 10. SAFE TRANSPORTATION LIMITS: We feel like the current balance between motorized and non-motorized recreational vessels is sustainable on most days, but to add any more jet skis or larger boats would be a challenge. As it is, to recreate on a holiday is quite unsafe for all users, as motorized users are trying to avoid non-motorized users and finding that, as non-motorized usage increases, they have very little unoccupied spaces. A study should be performed that determines the actual usage and limits of the lake, and what are deemed safe limits for motorized craft and non-motorized craft for a lake of Holland's size. Montana's motorized boat users are polite and considerate; can the same be said for out-of-staters who have come for a weekend at a resort for which they paid a lot of money?

I am in support of a public, transparent process that is conducted with integrity and the best interests of everyone in mind, including the wildlife that lives there. I recognize that it will not be easy, but the impacts could last a lifetime, so now is the time to pause and reconsider if the extension of the special use permit should even be allowed. We certainly do not want to be in a situation like Spain's Marina Isla de Valdecañas; we must get this right if we wish to avoid future lawsuits and harm to the area. I hope that the USFS will listen to the thousands of people who have taken the time to voice their concern, and realize that Holland Lake and its adjacent public lands are highly valued and cherished by locals, and deserve great care and consideration. I urge POWDR to consider options where they will be welcomed instead of vilified by locals, and urge the USFS to pause and offer a process with the integrity that Holland Lake deserves.