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Comments: Comments on Holland Lake Lodge Project:

Flathead National Forest Supervisor Steele's decision to ram this massive project through with a categorical exclusion rather than order an EIS to study whether the project threatens the area is wrong and inexplicable.

Holland Lake, in the Swan Valley is in the Crown of the Continent ecosystem. The Swan Valley is one of the most ecologically diverse areas within the Crown containing unique as well as threatened and endangered flora and fauna. Recognizing the critical importance of the Swan in protecting the ecosystem of the Crown, tens of millions of dollars have had been spent by both the Federal government, the State of Montana, state, national and local nonprofits, local governments and private persons to acquire public lands in the valley. Too numerous to list, they include the Montana Legacy Project, Montana Fish Wildlife and Parks, the U.S Fish and Wildlife Service, the Nature Conservancy, Missoula County and Vital Ground, to name a few.

The permit transfer with its proposed dramatic expansion requires an EIS. Many comments have appropriately pointed out the harmful impacts by the sheer physical size of the proposal, the dramatic increase in human activity and the fact that it would be year-round. But another critical reason for an EIS is the impact of the inevitable development of private land adjacent to the permit site. Private lands next to public lands with few, if any, development restrictions have enormous and most often, harmful, consequences to the ecosystems of adjoining federal lands. The rampant and unchecked development on private lands such as the Big Sky/Yellowstone Club area in the southern Gallatin Valley with its baleful impact on surrounding public lands is a stark example of this.

There is a similar threat to the Holland Lake area. One in particular is a privately owned section of land (640 acres) immediately N and adjacent to the Holland Lake Lodge permit area. These 640 acres is 64 times larger than the Holland Lake Lodge tract. Situated a few hundred yards from the Holland Lake Lodge permit site, its development potential and accompanying impact underscore the necessity of an EIS since the Forest Service has no control whatsoever over this private property.

POWDR's history shows it is an aggressive expander of its use of public lands and adjoining private property. In a 2018 news release it celebrated expanding its Heli Ski operation "...to more than 150,000 acres of U.S Forest Service and private terrain" throughout mountain ranges in Utah. The same news release touted POWDR's offering of "... boutique, remote lodging...that offers adventure seekers the perfect jumping off point for rewarding and challenging terrain. " It is well to remember that the West side of the Swan crest is not protected as Wilderness. As such, it is reachable by snow cats helicopters and usable by all manner of over-the-snow motorized vehicles.

The development of this private tract is not an abstract threat, since the section recently was sold. Alarmingly, given the bums' rush by Supervisor Steele, this section of land changed owners many months after the time that POWDR submitted its plans to the Flathead National Forest. Was this a mere coincidence?

Here's the recent history from public records. This section of private land is Section 27 in the appropriate township and range for the area. Again, it is just N of Holland Lake and slightly NW of the Holland Lake Lodge permit area. The Montana Cadastral shows that Section 27 is owned by Section 27, LLC a Montana corporation. Section 27, LLC was just incorporated in March of 2022 according to the Montana Secretary of State. Shortly after its incorporation, Section 27, LLC on April 1,2022 bought Section 27 as documented by the deed recorded by the Missoula Clerk and Recorder. Section 27, LLC's address is 174 Highland Street, Weston, Massachusetts according to the Montana Secretary of State. The Massachusetts Secretary of State deeds section lists the owner's names of 174 Highland Street ,Weston, MA, 02493-1112 . Zillow shows the address as a private home in a tony residential area.

In 2017, the Flathead National Forest celebrated the acquisition of another section of 640 acres in the same area made possible by funds from the state and nonprofits. Ironically, in view of Supervisor Steele's decision to use a categorical exemption, then in 2017, the Flathead National Forest lauded and recognized the unique ecological importance of the Holland Lake area in a news release celebrating the acquisition of the section for the public

noting that:

"This area provides connectivity from the Swan to the Mission Mountains and offers vital habitat for species protected by the Endangered Species Act. This area supports populations of federally threatened bull trout, grizzly bear, and Canada Lynx, as well as gray wolves, elk, moose, deer, mountain lions and wolverine. ... On a larger scale this Crown of Continent area links the Canadian Rockies with the greater Yellowstone Ecosystem, Selway Bitterroot Wilderness, and proposed Great Burn Wilderness. "

The uniqueness of the area has not declined one whit since 2017. Supervisor's Steele's decision to ignore publicly available documents and ignore his own agency's characterization of the area by using a categorical exclusion is both inexplicable and wrong. If anything, the necessity and value of the Holland Lake area to the survival of the Crown of the Continent ecosystem and threats to it, are greater now than they were then. The only reasonable and responsible course is for Supervisor Steele to order an EIS.

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