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Organization:

Title:

Comments: To Whom It May Concern,

I'm submitting my public comment, for the record, to express my opposition to the proposed expansion of Holland Lake Lodge and its Special Use Permit. The size and scope of this expansion should not allow for it to be considered as a categorical exclusion and a full review of the environmental impacts should be conducted.

Many comments have already been submitted questioning environmental concerns and even the legal process of this transfer of the Special Use Permit and proposed changes for expanding the SUP. I also share those same questions and concerns and in addition to those voiced by others, I wanted to add some additional concerns and questions that I would like the Forest Service to consider and provide answers for.

We have heard repeatedly from representatives from the Forest Service as well as Powdr that they have made mistakes and that they "own" their mistakes regarding how they have navigated this proposed project. Has there been any consideration to go back to the beginning to start the process of this proposal correctly?

At the Seeley Lake meeting, we heard that the goal of Powdr for this project is to provide outdoor experiences to people. Doesn't HLL and the surrounding campground and public access already provide outdoor experiences to people? What studies have been done to examine how existing outdoor experiences would be affected by an expansion of this property?

At the Seeley Lake meeting, we heard from the panel of representatives for the Forest Service, HLL and Powdr that, so far, there hasn't been any review of the financials as well as any studies of the potential impacts, this expansion could have, concerning the environment, the local community, emergency resources as well as how this expansion could affect other Forest Service managed lands, in the Swan Valley and beyond, by increasing use and attracting new user groups. How is that we have gotten this far in the process without any of this being addressed?

At the Seeley Lake meeting, we heard the term Sustainability repeatedly used. The representatives of the Forest Service, HLL and Powdr (one of which who's job title is VP of Sustainability) never fully answered any of the concerns, presented by the audience, of sustainability as it pertains to the environment, social well-being, and economics. We heard from Kurt Steele, when addressing a question about sustainability, that sustainability is "opinion" based. If we all have different opinions of sustainability, then how can Powdr fulfill the promise of being sustainable?

Sustainability, when it concerns environmental and social well-being, may be debatable but economic sustainability cannot be argued. A business is either making money or losing money. How can Powdr promise to make HLL economically sustainable when they haven't operated or managed a property in Montana before or one of this size and nature? We have been told that the current HLL is not economically sustainable, what other ideas, outside of expanding HLL, have been explored by the Forest Service?

Kurt Steele mentioned, at the Seeley Lake meeting, that they, the Forest Service, just wanted to help the current owner of HLL. Why is the Forest Service finding it necessary to help bail out a failing business? Has the Forest Service been asked for help from the current HLL owner prior to getting to this point? What other ways has the Forest Service tried to help the current HLL owner?

Mr. Steele also mentioned that the Flathead National Forest manages 33 other active SUPs. Have any of these other businesses asked for expansions, similar to the size and scope of the one being proposed at HLL or sought

help from the Forest Service to be successful? If so, how does the Forest Service decide which businesses are deserving of their help?

At the Seeley Lake meeting, there was only talk of the Forest and their role in reviewing environmental sustainability and little to no discussion by the Forest Service or Powdr concerning economic sustainability or social well-being and community sustainability. I understand that the Forest Service will be reviewing the environmental sustainability of this project but I would like to know who oversees and who will be reviewing the economic sustainability as well as the social well-being and community sustainability?

Kurt Steele mentioned at the Seeley Lake meeting that they have not looked at the financials or done any financial review of the proposed expansion. If the Forest Service hasn't been presented with or reviewed the financials of the proposed expansion, how is it able to even speak into the economic sustainability?

Who pays for the scoping process that the Forest Service is conducting?

How much money and staffing does the Forest Service budget for this type of review?

How much time and money has the Forest Service spent on this scoping process so far?

How does the Forest Service recoup it's investment in this proposal, cost recovery?

What happens if the Forest Service exceeds it's budget to review this proposal, if there is a budget?

If a review of the financials hasn't taken place, then how does the Forest Service and the American People know when they break even on the investment that the Forest Service has put into this proposal?

What are the terms in which the Forest Service/American people are to receive from the expected revenues of this project?

If the proposal is approved, how does the Forest Service measure success for a project like this?

What is the economic value given to wildlife and habitat and why should "presumed" financial gains of an out of state company be more important?

What is the financial gain that the Forest Service expects to receive from this expansion?

What are the requirements for reinvesting in the structures and property? If there are not any requirements, won't this happen in another 100 years with a need to expand again it a make it viable? This is the reasoning we have been given for the current proposed expansion and without any requirements, to maintain the structures, would this be a never-ending cycle of: investment, use, deterioration, expansion?

If the current lodge is in need of improvements and the only way to make it economically viable, as a business, is to expand it then is it likely that the dollar value that the current owner of the lodge is seeking is overvalued? If the current failing business model, SUP and buildings reflected their true value would it be feasible to simply improve the property rather than have the need to expand it?

If HLL hasn't been operating year-round, in the winter months, how can Powdr be certain it will be viable in the winter if this property is so different than the others that they operate? What is the current winter attraction that will draw people to this location and what winter activities will need to increase whether by Powdr directly or outside parties? Does the Forest Service plan to increase other winter special use permits in the Swan Valley such as cross country ski trails, snowmobile tours and trails, backcountry skiing, guided ice fishing? With

commercial use of the Forest Service managed lands in the Swan Valley having primarily been non winter, what studies have been done to review an increase in winter use?

At the Seeley Lake meeting, we heard from one of the Swan Valley (Condon) Emergency Response volunteers who voiced his concerns regarding safety and resources to respond to an increase in people and traffic to the area. How is it that this proposal has gotten this far in the process without anyone from Powdr or the Forest Service reaching out to Emergency Resource providers and personnel? Has Powdr presented any information to the Forest Service or the public of how they would address this concern?

With an increase in traffic on HWY 83, that an expansion such as this would bring, what are the Department of Transportation's requirements, regulations and thoughts on this proposal? Why was there not a representative from the Department of Transportation at the meeting in Seeley Lake? What are the expected increases in wildlife fatalities, on HWY 83, due to an increase in motor vehicle traffic this expansion would bring by increasing traffic to the area?

With Swan Lake Ranger District Forest Service office having much turnover of staff overseeing special use permits and recreation and at times being without a dedicated staff in that position how can you provide the dedicated staffing to oversee a project of this size and scope?

At the Seeley Lake meeting, Kurt Steele had mentioned something to the effect that "the bureaucratic system moves slowly", which is something we all know and understand but what we expect is that regardless of how slow it moves it should produce results that have been thoroughly researched and reflect the best interest of all stakeholders. If government decisions are slow to be decided, then why does this proposal seem to have a sense of urgency? What is the typical timeline of proposals of this size and scope?

My concerns, perspectives and questions on this issue, of the proposed expansion of Holland Lake Lodge and its SUP, come from my college education and 20-year professional career in the outdoor recreation industry. I have a degree in Parks, Recreation and Tourism from Michigan State University specializing in natural resource-based recreation and public land management. For the last 13 years, I have owned and operated a successful small business operating on a Special Use Permit with the Swan Lake Ranger District. We have purposely kept our business small with as minimal impact on the environment and other user groups as possible. My family and I are residents of Bigfork and spend much of our time recreating in the Swan Valley including Holland Lake and it's surrounding area.

Thank you for taking the time to read and consider my questions and concerns.  
Mark Schurke