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Organization:

Title:

Comments: If you build it, they will come, from the movie Field of Dreams. But who will come, and what will they be doing?

The Who:

The minimum room price at Holland Lake lodge is already \$300., yet somehow the current proprietor isn't able to make the property pay. The new investors intent on bailing out the failing operation will need to recognize an acceptable, to them, return on investment-meaning that room prices, as well as other services and fees, will necessarily escalate accordingly-even with the additional revenue brought in by the additional rooms.

We've seen this story many times before, mostly at National Parks. Perfectly fine rustic lodges are remodeled into The Ritz, with all the amenities "demanded by discerning travelers", and all of a sudden much of America can't afford to stay, eat, or visit there. No matter-the wealthy elite and international set is happy to pick up the tab. Other than perhaps a few more boat rentals (for now), what does this offer the average American? Seemingly, precious little.

So in the name of getting more people to 'enjoy the National Forest', this is acceptable? Tearing the whole thing down and establishing a new campground would better serve this objective and fit more with the surroundings and the Swan Valley in general.

The What:

The use of the Categorical Exclusion under NEPA is meant for established uses and already disturbed and developed sites. The terms 'minor' and 'minimal' in describing both the proposed actions and their effects are essential components of a CATEX for proposed projects. I have been a leader of natural resource project teams which secured government activity permits under CATEX. CATEX does not allow projects to pretend they will exist in a vacuum; it demands they show conclusively, with the best available data and judgment of both applicant and approver, that they will be doing essentially the same activity or perhaps a bit more of it, in locations already subject to and used to the proposed new activity. For instance, an applicant wanting to increase the amount of a mineral being extracted on a lease or a series of adjacent leases could potentially use a CATEX for a 10 or 20% volume increase, as long as the increased activity was found to have no appreciable effect on its surroundings, but could not double or triple output over dozens of leases and /or begin accepting untreated sewage or nuclear waste to dispose of on those same sites under the CATEX. Greatly scaling an operation with likely additional components to come in the future, as proposed for Holland Lake, should not utilize a CATEX as it will have effects beyond the current one that are more far reaching, requiring more extensive analysis.

This is where the Holland Lake proposal as CATEX either fails, or is a trojan horse for activities not contemplated under the existing submittal. The amount of proposed activity, and its potential effects on the surrounding environment, are much more than is currently ongoing. Moreover, the new development will have side effects such as increased waste and wastewater, traffic, road deterioration, noise, visual impact, loss of old growth forest, increased trail usage and degradation, increased trail conflicts and general increased law enforcement need, wildlife impacts, and the relocation of recreationalists and their attendant impacts to other already seasonally crowded trailheads. Highway 83 is a summer superhighway already, and our family has witnessed multiple near misses at the Holland Lake turnoff. Has the impact of greatly increased traffic at this choke point been considered? What will this do to property values?

True, Holland Lake with all its current development and heavy seasonal use is hardly pristine, but this is precisely why an exclusive year round resort that greatly increases the usage of the area in general could be the straw that breaks the proverbial camel's back. The Holland Lake Master Plan treats the proposed development as having no effects outside of its investments on an isolated National Forest lease; this is preposterous.

Cautionary tales: The Gallatin River downstream of Big Sky is now being classed into an affected waterway status because of the preponderance of algae from the runoff from the development there. Also, private landowners and loggers alike have to follow Montana BMP's (and do so both willingly and well) when cutting timber adjacent to waterways. Disturbance and development next to waterways is supposed to be careful and even difficult; why should this proposal be any different?

Also proposed within the Master Plan is verbiage alluding to future activities carried out by third parties on behalf of the new and increased Holland Lake clientele. Doubtless there are numerous businesses, especially guides, working the Bob and the many local waters who would gladly provide services similar to those offered already in the valley.

But POWDR isn't a guy with a couple of horses and some panniers hoping to get a spot at a local trailhead. We have utilized POWDR properties (unknownst to us) and there is nothing low-impact about them. They are high end destinations that dominate their surroundings, continually expand and upgrade, import workers from multiple continents, and challenge local infrastructure to keep up; to pretend otherwise is disingenuous. Activities not currently available in the valley (e.g. heli-hiking and skiing) and future National Forest plan use changes are likely outcomes of the new Holland Lake ownership. What guarantee is there that activities not owned and operated by the POWDR will not be approved as one-offs, initiate, and collectively and perhaps dramatically exceed the scope and presumed intent of the current proposal utilizing the CATEX?

On the plus side, there would likely be some benefit to local businesses and employment opportunities in general, as long as the upgraded Holland Lake enterprise does not siphon off employees necessary to run those same businesses or increase wages in the valley to the point that existing businesses become untenable. There might be significant support within parts of the community for new revenue opportunities which allow more general economic growth. As the recent debate over the proposed Condon Container Site showed, residents and stakeholders of all stripes will want to actively participate in this decision. (One wonders whether that proposal was related to this one.)

We own a cabin and some land a 10 minute drive from Holland Lake and enjoy the area the way it is, especially once the summer push is over, and definitely the quiet winters-which is also to say the USFS does its requisite, very average job managing the bulk of the acreage in the valley. To expect things to stay the same indefinitely is unrealistic, except perhaps for the seasonal wildfire smoke-which perhaps yields clues as to USFS asset evaluation and management capabilities. However, such potential and lasting change at Holland Lake should only be promulgated utilizing the government's own rules and processes currently in place, to ensure that the area, current residents and all users are not excluded from having input, and not forever harmed.

For these reasons, a robust Environmental Assessment, paid for by POWDR, and not a high-level CATEX, where public comment is window dressing for a decision already made, is the proper mechanism to move forward with such a potentially impactful project. A group like POWDR should enthusiastically support the longer EA time frame to ensure their potential future development is evaluated transparently and undertaken responsibly.

Respectfully,

William Wilsey