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Comments: USFS - Extend the public comment period through December 7, 2022 or better through December 31, 2022 so that all relevant information can be made available to the public before the close of the public comment period.

I have already commented twice on this project and this is my third comment. I have been forced to comment multiple times and continue to evolve my opinion of the "Holland Lake Lodge Expansion Project" (HLEP) because the process of discovery about this project has continued to evolve. Not all information was available when the project was publicly announced and as the project and as the public learns more we discover the project is not what was initially claimed.

On September 1, 2022, the USFS announced the project to the public. The original announcement that is still visible on the USFS website for this project and clearly states:

"The project proposes to repair the existing historic old lodge, add new buildings[,] enhance accommodations and upgrade the infrastructure within the 15-acer permit area."

The announcement only mentions one public meeting about this project with the statement:

"The Flathead National Forest will be hosting a public meeting about the Holland Lake Lodge Expansion Project on Thursday, September 8th, 2022, from 5:00-7:00 pm..."

And ends with the statement "The Forest Service is asking to receive comments by September 21."

The documents relevant to informed comment on the project were not even available until September 6. The original comment period was set to close on September 21, 2022. This is at most 21 days of public comment. But if you consider that informed comment was not possible until the project documents were released on September 6 - that means the effective comment period was 14 days at most.

On September 12 the Montana Free Press newspaper reported on the first and only public meeting scheduled at the beginning of the public comment period that occurred on September 8, 2022 with the description: "There was no official presentation, and locals circulated among the various representatives to ask questions."

What kind of public meeting on a major project occurs only 4 days after the release of the relevant documents for public comment, and does not include a formal presentation of the relevant information that the public needs to be capable of informed comment and has no formal meeting structure? What was the USFS plan to capture public comments if there is no formal presentation or meeting structure and "locals circulated among the various representatives to ask questions."? Who recorded the public comments at the September 8 meeting? How do we know that all the comments were captured? This was a highly flawed process for public comment that would conveniently allow the USFS to avoid official documentation of public comments.

The public comment period was extended to October 7, 2022. But this is still a remarkably short 31 day period when the relevant information was available before public comment is closed.

Now we learn that the USFS has not been forthcoming about the HLEP. The initial announcement clearly claims: "...within the 15-acer permit area". We learned recently that the current permit area is NOT 15 acres but is 10.53 acres. It is inconceivable that the USFS did not know the size of the current permit area. USFS is the public fiduciary in this process and spent nearly a year in internal review of the plan proposed by POWDR. How is it possible that USFS did not detect this gross violation of the permit in its lengthy internal review process?

The USFS website today still clearly states on the opening page of the website that:

"Flathead National Forest is proposing facility expansion of Holland Lake Lodge. Holland Lake Lodge, Inc. Master Development Plan details building and infrastructure improvements, enhancing the visitor experience, within the current permitted area."

This is clearly a false statement as has been admitted in public meeting by Kurt Steele. Why is such misinformation still is posted on the HLLEP website?

Further, since the USFS plans to cede control of the sewage treatment facilities to POWDR, this adds about 5 additional acres to the area under control of POWDR. The plan thus put forward by USFS and POWDR is to nearly double the permit area for the Holland Lake Lodge special use permit.

How is it possible that a categorical exclusion is even considered for a project that nearly doubles the permit area?

The last public comment meeting on October 4 was far too short to accommodate the number of concerned citizens that came to speak, and USFS refused to extend the meeting to accommodate the large turnout. Clearly more public comment meetings are needed.

Regardless of statements from USFS representatives that effort has been made to make this a transparent process, this process has been anything but transparent.

For this reason alone USFS should extend the public comment period for a minimum additional 60 days because the process so far implies that the project details are still not publicly available. What other new project details will be revealed/discovered on October 8 or after that have substantial relevance for this project?

I certainly do not know.

The public certainly does not know.

I now wonder if the USFS even knows.

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