

Data Submitted (UTC 11): 10/7/2022 7:14:51 PM

First name: Cathy

Last name: Sanders

Organization:

Title:

Comments: Flathead National Forest

Kurt Steele, Forest Supervisor

Shelli Mavor, Project Lead

Please accept these comments into the public record in reference to [fs.usda.gov/project/?project+61746](https://fs.usda.gov/project/?project+61746)  
Holland Lake Lodge Proposed Expansion

This letter is submitted in objection to the acceptance of the POWDR proposal to expand Holland Lake Lodge. First, this project is a textbook example of extraordinary circumstances which not only preclude a Categorical Exception, but demand a complete Environmental Impact Study. The USFS and Flathead Forest are in fact violating their own rules which require that such usage be "in the interest of the public good". There is zero empirical evidence that this project benefits the public good and to date (in fewer than 30 days) more than 6000 public comments have been received stating clearly that the public does NOT consider this warranted or suitable.

The process has been mishandled to a degree that sadly brings to mind subterfuge rather than simple misunderstandings. Communication with the public has been opaque at best and laughably limited. Even local homeowners were given no formal notice and received news only through the grapevine -sent 6 days prior to the only planned meeting. That meeting involved no presentations and no opportunity for the public to speak (as well as no chairs). Then the public was given 7 days to respond. Due to outrage from the citizenry, that has now been extended for 30 days, which is still inadequate.

The core of this argument, the Special Use Permit, is debatable and dubious. The proponent presents this as 15+ acres, while it has in fact never exceeded 10+. Further, proponents suggest that they will extend that occupied area up to 19 acres. By what right is any of this PUBLIC LAND simply TAKEN by Powdr/HLL? There is no legal basis whatsoever for this. Further, the permit itself is under question. Contrary to the opinion of POWDR, the current owner and perhaps some USFS personnel, the USFS is UNDER NO OBLIGATION TO renew this permit or to transfer it to a different party. USFS (as well as other federal and state agencies) have been known to non-renew permits under multiple circumstances, including cabins destroyed by fire through no fault of their owners', who nevertheless then lost their right to rebuild.

In addition to the process, the project itself is ill conceived and wildly inappropriate for the location. Holland Lake is a very small lake which has intentionally been maintained in a rustic manner. Cabins must be set back from the water, preferably out of sight. Boat houses are not allowed. The undeveloped boat launch cannot be improved. The roads are unimproved. The multi billion dollar destination resort now proposed by Powdr is utterly incompatible with the unique and highly fragile ecosystem which leads directly into the Bob Marshall Wilderness area and the recommended wilderness.

The impacts of the project as proposed would be devastating on the human and natural environment, including endangered species such as the grizzly, Canada lynx, bull trout and loons. Pollution of ground water and lake water, disposal of waste and garbage, noise and light pollution all remain insufficiently addressed. Based on the estimates in the proposal, visitor days to HLL would increase four or fivefold. Holland Lake and the Swan Valley are already in grave danger from wildfire. Egress from Holland Lake is dangerous and limited now. The Valley itself has ONE ROAD in and out. A fivefold increase in visitors would multiply this risk tenfold. Emergency services and firefighting are all volunteer and currently stretched to their limits. Does anyone even want to contemplate the carnage of a major fire or other disaster with hundreds more people and vehicles in the area? Route 83 is dangerous as it is. Adding many additional visitors and vehicles will make it much more so, necessitating road expansion, traffic control measures, etc. Who pays for this?

Given the factual errors, inaccuracies, obfuscation and strong public opposition, I would argue that this project should be rejected out of hand. At the very least, it is incumbent upon the Forest Service to begin the process anew with correct information, appropriate public noticing and lengthy comment periods. NEPA requires that CE NOT be employed in this case. Minimally, the extraordinary impacts require a full Environmental Impact Study, as well as possible outside consultations regarding economic and social impacts.