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First name: Mark

Last name: Connell

Organization:

Title:

Comments: As is clear from the sheer number and intensity of comments to date, there is enormous public interest in this project and the outcome of the application process. This interest stems from the unique environmental characteristics of the Swan Valley; the traditional uses to which the Holland Lake area has been put, and the values the lake and its surroundings represent to Montanans; and reasonable fears that whatever the developers are saying now in support of their application, the project, once approved, runs the risk it will inevitably expand over time to further degrade a set of treasured and irreplaceable natural resources, resulting in a host of known and unknown negative consequences that can never be remedied.

Human nature suggests that whatever the developers' current intentions, the "camel's nose under the tent" phenomenon is a very real one. Where the stakes are as high as in this case, it is only natural that those who love Holland Lake - which means virtually everyone who has ever plied its waters, hiked or ridden its trails or otherwise laid eyes on it - do not want to see it diminished.

Casting a critical eye on the developers' immediate plans and intentions, a number of points stand out. First, the Holland Lake Lodge operation sits on public land, and exists there under the terms of a special use permit that requires Forest Service approval for any significant changes or additions. In determining whether such approval should be given, the underlying guiding principle is that the public interest must be served in all instances.

The changes incorporated by the proposed project, and the likely effects of those changes on a largely pristine lake environment, are unquestionably substantial no matter how they are measured. The increased size of the project's footprint; the visual, auditory and experiential effects on other recreational users of adding to the lake a new lodge, restaurant, 26 lakeside cabins, staff housing, supporting infrastructure, and hundreds if not thousands of additional visitors and supporting staff each year; the additional water resources and effluent associated with the increased visitor load; and added parking and traffic are just a few of the obvious changes that will result. And how would a successful, booming project of this kind affect the potential development of existing large parcels of private land in the surrounding area? Would the community's concerns about further industrial development, "suburbanization" issues, effects on the watershed, loss of wildlife corridors and the like be validated? Does the spill-over development of the Big Sky resort in the Gallatin Canyon offer useful guidance here?

Of at least equal import are the effects the project would have on the surrounding wildlife, one of the most valued resources of the wild Swan Valley and the key role it plays in the western Montana environment. Federally listed threatened species, species listed as endangered, other species eligible for federal listing, and critical habitat for all of these animals will be affected to a greater or lesser degree not only by the additional throngs of visitors attracted by the project and the surrounding public wildlands, but by the fact that the development is intended to be four-season in nature. Adding hundreds of additional outward-bound winter travelers each month to the trails and snowy flatlands, hills, mountains and forests of the area will have predictably negative effects on active, migrating and denning animals, many of whom are already stressed by the valley's history of logging, roadbuilding and other human usage.

The point of all this is to emphasize that all of these probable if not certain effects flowing from the changes POWDR proposes for the public lands required for its commercial project to succeed need to be studied, evaluated, balanced and taken into account NOW, before the project is allowed to build irresistible momentum and get fully under way. For better or worse, Holland Lake and its environs have been able to tolerate the small-scale, seasonal commercial development represented by the existing lodge that's been operating in recent decades. Will they be able to tolerate the much larger, better organized, better financed, far more intensive, far

more ambitious four-season proposed project in the future, one that brings in and relies upon additional multiples of visiting guests and staff, without major hits suffered by the Swan Valley, its wildlife and existing community? This is something no one can now assess with any degree of precision, but that is exactly the point. These are all things that need to be studied and determined before POWDR's application can be considered.

As a result, it is clear that the categorical exclusion currently being considered for the project is grossly insufficient, and a full environmental impact statement must be required, one that examines the full range of immediate and cumulative effects of POWDR's proposal, and considers a wide variety of alternatives including, most prominently, a finding of no public interest. The public has an intense, longstanding and well-documented interest in maintaining Holland Lake and the surrounding Swan Valley, along with all of their exceptional natural attributes, in their existing and relatively unblemished condition. Conversely, there is no public interest in seeing those irreplaceable resources degraded.