

Data Submitted (UTC 11): 10/8/2022 3:11:54 AM

First name: Bill

Last name: Lombardi

Organization:

Title:

Comments: I am enclosing a letter prepared by Save Holland Lake asking the Flathead National Forest to extend the comment period to correct the misinformation about the size of the project, and to explain how the Forest Service could not get the facts straight and present them to the American people. This type of problem seems to be persistent throughout this process, and I would like the Forest Service to explain how its employees and officials could not be certain about what they were proposing to the public. The bottom line is that the Forest Service's proposal has been rife with inaccuracies and uncertainties, and to ask the public to comment on a proposal that is not factually correct seems to be inconsistent with a thorough, transparent and professional process that the American public deserves to determine how to use its public land.

I object this broken process and ask that you not approve this proposal because it is not in the public interest and has been fraught with errors.

Bill Lombardi

October 7, 2022

Kurt Steele

Supervisor

Flathead National Forest

650 Wolfpack Way

Kalispell, MT 59901

Kurtis.Steele@usda.gov

CC: Christopher.Dowling@usda.gov

Michele.Mavor@usda.gov

Dear Supervisor Steele:

Save Holland Lake, an ad-hoc coalition of concerned citizens advocating for the pristine lake, surrounding ecosystem and our public land, respectfully requests that you extend the public comment period for the proposed Holland Lake expansion project beyond October 7, 2022.

In your initial scoping document you state, "all activities would occur within the existing 15 acre permitted area." The language surrounding the "15-acre" Special Use Permit must be corrected. It is imperative the public is made aware of the fact that the current Special Use Permit is for 10.53 acres, and that the proposed project actually expands the HLL area by the lake and along the shoreline by 3.63 acres, increasing the Special Use Permit to 14.16 acres with an additional 5.22 acres set aside and planned for wastewater due to the project expansion, making the grand total of land requirements for the project to be 19.38 acres.

This discrepancy has not been explained to the public and is not in the scoping package. Your agency has continually been referring to the current Special Use Permit as 15 acres, which is not accurate. Citizens deserve to be told factual information and therefore provided with enough time to further comment on this matter. Even today citizens are adding public comments to the Forest Service site that reference a 15-acre site that does not exist.

Please advise us as soon as possible about this request to clarify and correct this misinformation, and allow American citizens ample time to understand the true scope and impact of this project.

(We also are enclosing a media release that fully explains the issue and problem.)

Thank you for your prompt consideration.

Sincerely,

Jacole Johnson Cheri Thornton Travis Cole Lucy Dayton David Roberts Bill Lombardi

Members, Save Holland Lake

Cc: Montana Congressional Delegation

Attachment

SAVE HOLLAND LAKE

<https://www.savehollandlake.com>

<https://www.facebook.com/savehollandlake>

Save Holland Lake Group Says Forest Service Plan Inaccuracies Misinform Public on Holland Lake Expansion Plan, Need to be Fixed

Developer Seeks Almost Twice the Acreage of Current Permit Issued

Public's Been Locked Out of Process, Development Will Harm Wildlife, Ecosystem

October 6, 2022

(Contact: Bill Lombardi / 406-459-8860 / bebomontana@gmail.com)

(Seeley Lake, MT) - An ad-hoc coalition of citizens called Save Holland Lake says the U.S. Forest Service has misinformed Americans about the amount of public acreage a developer would use to triple the size of Holland Lake Lodge on the pristine lake in Montana's Seeley-Swan Valley and is asking them to fix their mistake.

The group today is asking the Forest Service to highlight, clarify and fix this mistake, admitted by the agency's Flathead National Forest supervisor, Kurt Steele, at a public meeting in Condon on October 4. The mistake was pointed out by a Save Holland Lake member to numerous Forest Service officials in attendance. The group also will ask Montana's congressional delegation to extend the comment period given this big mistake.

"This is the gang that couldn't shoot straight," said Bill Lombardi, a member of Save Holland Lake who lives in Seeley Lake. "The Forest Service has wrongly stated the size of the public land the developer needs for this massive project. They should start over and be honest and factually correct with the public, because so far the process has been confusing, hidden from public view and murky, at best."

Here's the key excerpt from the Missoulian report on the Forest Service October 4 meetings:

"But Steele also admitted mistakes in handling the project. The current proposal covers about 15 acres under a Special Use Permit. Steele said he originally thought that was the same size as the lodge's existing permit and wouldn't be an expansion. He later realized that the lodge's current permit is for 10.53 acres, not 15. And with the inclusion of wastewater facility POWDR [the Utah-based developer] would take over, the proposal balloons to about 19 acres - nearly twice the current permit acreage."

Steele told the more than 100 people opposed to the project in Condon that he had made a mistake and that, as the Missoulian quotes him as saying, "Come to find out it's only 10.53 acres."

It was only after being asked multiple times by the public did the Forest Service admit that Utah ski giant POWDR is asking for more public land than allowed under the lodge's current special use permit.

Save Holland Lake is asking the Forest Service to not only correct this mistake publicly but to advise the thousands of people who have commented on the proposal and used the incorrect acreage of the public land under development consideration to decide if they want to amend their comments given this FS "mistake."

"This proposal will greatly expand the stretch of impact to this pristine lake, and the Forest Service either wasn't aware of that impact or didn't tell the public," said David Roberts, a member of Save Holland Lake who pointed out the acreage discrepancy to Forest Service officials at the public meeting in Condon. "Either way, this shows how flawed this project and process have been. It's a huge disservice to the public who own and treasure this lake and public land."

Not one member of the public spoke in favor of POWDR's project in two public meetings in the Seeley-Swan Valley on October 4. And hundreds of public land owners expressed outrage at the Forest Service's confusing explanations of the project, timeline, extensive detrimental effects to the natural ecosystem and rural nature of the valley, and inattention to detail.

Even POWDR representatives apologized for not engaging the public when they began exploring the project years earlier.

"This proposal has been doomed from the start - the Forest Service simply can't get the facts right for the use of our public land," Lombardi said. "The bottom line is they have misinformed the public, and the Forest Service should either start over or deny this permit outright. We don't trust them."

## BACKGROUND

Save Holland Lake, meanwhile, has pressed the Forest Service to extend the project's comment period, to do a more rigorous environmental impact statement rather than a less stringent analysis (categorical exclusion), and deny the Special Use Permit for this giant project because it's not in the public interest.

The group says the public has been locked out of the process and that the massive development, on public land, will harm the pristine nature of Holland Lake, the fragile ecosystem, endangered and threatened species, and the unique rural and historic nature of the wildlife-rich Seeley-Swan Valley.

"Thousands of Montanans know this giant project is plain wrong for Holland Lake and our public land," said Jacole Johnson, a Missoula mother of two and businesswoman who, with her family, recreates at Holland Lake south of Condon. "We've lost trust in the Forest Service because they've locked us out of the process to determine the future of our public land. This massive project will have extensive effects on the valley and harm its air, water, ecosystem and wildlife. It's wrong and not in the interest of the public."

The group is asking the Flathead National Forest Service supervisor to:

Extend the public comment period beyond October 7, 2022

Complete a more detailed environmental impact statement (EIS)

Ultimately deny the extensive project's special use permit for development on public land because it is not in the public interest

The Save Holland Lake group started just last month after the Flathead National Forest announced that it was

considering a special use permit for one of North America's largest ski developers, POWDR in Utah, to triple the size of the rustic Holland Lake Lodge and substantially increase human visitation to the quiet Holland Lake area 20 miles north of Seeley Lake.

The massive project would be built on public land. POWDR hatched the plan behind closed doors with the Forest Service, who received development plans in April 2022 (discussions were begun well before then) but didn't announce the proposal until September 1 this year. Then the Forest Service said the public had to comment on the proposal by September 21. But thousands of cries of public protest forced the forest supervisor to extend the comment period until October 7.

Flathead Forest Supervisor Kurt Steele said officials would consider the project under a categorical exclusion, the least stringent analysis, rather than using a more rigorous environmental analysis or environmental impact statement.

So far, in just a month, the Forest Service has received about 6,000 comments on the proposal, with the overwhelming majority of the comments opposed to POWDR's plans for extensive development on public land.