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Organization:

Title:

Comments: I offer the following comments for consideration and object to the Holland Lake Lodge (HLL) expansion project as proposed on the following grounds:

I have concerns that the activities proposed are beyond the scope of the Categorical Exclusion 36 CFR 220.6(e)(22) and warrant a more complete environmental assessment. Specifically, the following are pertinent to this proposal: water quality, landscape value (scenic management), air quality (traffic), threatened/endangered/rare species, and recreation. I encourage the Forest Service to do its due diligence and conduct a thorough review of the proposed project.

As I understand it, the current permit is for 10.53 acres. The scoping letter and proposed Master Development Plan state that 15 acres is authorized by the permit. If this proposal does indeed include an expanded footprint, would it not warrant a new permit application and review process?

The terms of the Resort/Marina Term Special Use Permit (USFS Authorization ID: SWA 456) that HLL operates under states that any changes in title or control of the business entity may result in termination of the current permit and warrant a new application for a permit (Paragraph I). As I understand it, the current operator sold a portion of his stocks in HLL to POWDR in 2021. As such, would this action not warrant termination of the current permit and require a new permit application?

Activities to date and activities proposed in the Master Development Plan do not align with the terms of the special use permit. No trees or removal of vegetation are authorized. Additionally, upon review of maps depicting proposed activities, it seems like some areas would have limited public access. Per the current permit, all activities must be available to the public and without discrimination.

Of interest to note, the permit also speaks to the permit holders conduct. My personal interactions with the current operator have been less than courteous/professional.

The Seeley Swan valley is a thoroughfare for grizzly bears and lynx. Maintaining the integrity of this landscape is critical for the species. Expansion of the facility as described (to now include winter activities) does not support this and conflicts with forest plan components that seek to support these species long term (FW-DC-WL-02 among others). This valley is also important for other listed and rare species that would not benefit from the expansion of HLL.

Holland Lake is highly valued by campers and non-motorized recreationists. I have concerns that the expansion of the facilities as described would detract from that outdoor recreation experience. Additionally, the expansion of this type of facility would not serve those members of the public who are unable to afford such an experience. Expanding the campground facilities while maintaining a small rustic lodge facility would provide greater access to the general public than expanding HLL. Refer to Forest Service Strategic Plan, Goal 2: Deliver Benefits to the Public.

Of concern, the strain of increased water recreation usage could potentially spread the invasive water lily present in Holland Lake. If a permit is authorized, I recommend considering a term that requires the permit holder to actively support and participate in ongoing suppression efforts.

While I appreciate the intent to provide additional job opportunities for the local community, I find it incongruent with current conditions. Per the current operator, he struggles to staff the facility. Additional job development

does not equate to successful recruitment. And bringing in an outside corporation may not be successful in a small Montana community.

As a Montana native, I certainly have concerns about this project and can understand why others would have concerns as well. I urge the Forest Service to consider valuable relationships with the local community members and other agencies that have voiced their valid concerns.