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First name: Jacole

Last name: Johnson

Organization:

Title:

Comments: Dear Mr. Steele and Ms. Mavor,

After reading through the majority of the 6,440+ public comments submitted (with only a tiny percentage in support of this project), it is clear that the Holland Lake Lodge Facility Expansion Proposal is not in the interest of the public. This proposal raises many ecological, historical, cultural, and public interest concerns. These issues alone prove this proposal should not qualify for a categorical exclusion. The Forest Service must complete a full environmental impact statement (EIS) for this Project because the scope of the Project will likely have a significant individual and cumulative impact on the environment.

Rather than echo the facts and sentiments that have been relayed to you over and over again in so many other public comments, I would like to highlight a few comments that capture the same narrative I'd hoped to convey.

Please reference the comments from:

The Winter Wildlands Alliance (9/9/22)

David Roberts (10/6 and 10/7)

Mark O'Keefe (10/7/22)

Daniel Hall (9/20/22)

The Swan View Coalition (10/5/22)

Emily Gillespie (9/19/22)

John Gatchell (10/6/22)

Lee Anderson (10/7/22)

Chris Servheen (10/7/22)

Rob Rich (9/11/22 & 10/6/22)

Katie Holliday (10/4/22)

Jim Morrison (10/3/22)

Alliance for the Wild Rockies, Center for Biological Diversity, Council on Wildlife and Fish, and Native Ecosystems Council (9/21/22)

The information provided in these comments paints a clear picture of the impacts and concerns associated with this proposal.

There must be more research and attention given to historic buildings and values present at Holland Lake as well as water quality, water demand, water rights, potable water disinfection/treatment, wastewater, waste, wildlife attractants/ wildlife conflicts, highway safety, local volunteer emergency services, and proposed tree removal. This project increases the risks for Threatened, Endangered, and Sensitive species. Why did the MDP overlook the impact of the project on lynx/ lynx critical habitat, grizzly bears/ Primary Conservation Area, bull trout/ bull trout critical habitat, westslope cutthroat trout, loons, mountain lions, wolverines, monarch butterflies, deer and elk habitats, and native fisheries? This scoping notice is a huge violation of the NEPA because the public is barely provided any information as to how and why this project will benefit wildlife.

In addition to this, numerous pieces of information presented in the Master Development Plan have since been shown to be factually incorrect, not because those responsible for disseminating the information have stepped up and informed us of their mistakes, but rather because devoted concerned citizens have spent countless hours researching and uncovering details that were either simply overlooked or blatantly disregarded when creating the MDP.

I am also gravely concerned about the willful ignorance that USFS personnel have shown in regards to the

requirements and specific acreage associated with the Holland Lake Lodge Special Use Permit. The initial scoping document states, "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. This will increase 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.

These discrepancies have not been explained to the public and are not in the scoping package. Your agency has not discussed the crucial and critical fact that the shoreline will now be consumed by the current Special Use Permit. POWDR has repeated the incorrect notion that they will only be using the same footprint HLL currently uses. This SUP is continually references as 15 acres, which is simply not accurate. Citizens deserve to be told factual information and therefore provided with enough time to further comment on this matter. Even today, on the last day of the public comment period, citizens are adding comments referencing a 15-acre site that does not exist. I believe the only ethical and transparent way to correct this matter is to revise the scoping information/ Master Development Plan and allow an additional public comment period once the correct and accurate details have been provided to the public. Also, it has become clear in the past few days that there has been a change in control of HLL Inc, which should automatically terminate the permit. POWDR's proposed use violates nine Forest Service policies established in Forest Service Manual (FSM) 2300 - Recreation, Wilderness, and Related Resource Management. It seems these policies are being intentionally disregarded to provide HLL/ POWDR a favorable and biased outcome.

The last area of concern I will touch on is how disappointed I am to see this project does not address the history or present/future commitments to the Indigenous Peoples (Pend d'Oreille (Kalispel), Salish, Kootenai and Blackfeet) whose ancestral homeland sits within the Holland Lake Lodge site. The USFS should consult and decide alongside the Confederated Salish & Kootenai tribes regarding how this property could and should honor and facilitate the land's connection to our Indigenous people.

The message for you is clear: The public does not want to see Holland Lake and the Swan Valley developed by major resort operators like the POWDR Corporation, especially on public lands. We have lost trust in USFS, HLL, and POWDR. And no matter how many times this statement continues to be thrown in our faces, we absolutely DO NOT share the same "Montana values" as those in support of this proposal. In only one month, a Facebook group opposing this expansion plan has grown to almost 3,000 members. It has become obvious the only people who are in support of this expansion are those who will monetarily benefit from it.

If this proposal is continued without addressing the before-mentioned details, it will become even more clear that you are not working in the best interest of those you are hired to work for. The mission of the USDA Forest Service is to sustain the health, diversity, and productivity of the Nation's forests and grasslands to meet the needs of present and future generations. It's obvious by the voicing of loud concerns from present generations of Americans that this project does not embody the stated mission of the Forest Service. Please give attention to the comments submitted by former USFS employees who have been adding to the chain of stewardship attached to this land for generations. The health, diversity, and productivity of this nation's forest will be forever negatively affected by this project. Please don't be responsible for breaking this generational chain of stewardship you have been hired to protect.

Sincerely,  
Jacole Johnson  
Missoula, MT