

Data Submitted (UTC 11): 10/8/2022 4:47:09 AM

First name: travis

Last name: cole

Organization:

Title:

Comments: Dear Mr. Steele and Miss Mavor,

I write to you now to register my public comment and my dismay at the current proposal. There is almost no part of this expansion that is in the interest of the general public or the people of Montana. In this short period in which we have been privileged to review the information that the Forest Service and POWDR have provided for the public, the mistakes and omissions are pervasive. There are seemingly inaccuracies in every piece of information that has been offered to the public for review. From the inaccuracy of the acreage included in the SUP to the statement in the MDP that bears won't be an issue because they are not present in the area. The public has been misled by these inaccurate assertions, and we have not been presented with factual information we can use to base our comments upon. The simple fact that that a project of this scale has been in the process for so long before the public was made aware and still has all of these factual inaccuracies speaks to the level of disregard within the office stewarding this public resource. It leaves the public asking if the forest service did no research on its own and is simply parroting POWDR and HLL prepared remarks, erasing all hopes for impartiality. How can the leaser not know the accurate amount of land that is currently under lease? It seems a paramount function of the Forest Service as a land regulator to know the exact specifications of the land it leases. When leasing public assets to private entities, clarity and forthright communication is a bare minimum. All citizens depend on this framework to allot our public lands equitably. The presence of errors in a proposal of this size and scope should signal a need to extend the decision making period for 60 days after an accurate representation of the project has been put forward to the public. We as the public have a right to accurate information to base our opinions on.

Not once at any of the meetings that I attended did I feel that the public's legitimate concerns were being taken seriously. The number of incomplete answers to pointed questions leads the public to question the ability of decision makers to place our best interest in the forefront of their decision making process. From questions regarding endangered species to SUPs and lease agreements, we've been told to wait and see or that the report was forthcoming. The fact that this proposal was on Forest Service desks months before the public became aware and we are still waiting on pertinent information makes one question if that information was ever intended to be made available to the public. Where is the science to back up the assertion that endangered species won't be severely impacted? Where is the accurate survey and documentation stating that enough land is already under the SUP to support the desired development? Where are the traffic studies showing that current infrastructure can support far more cars? Where are the studies relating to increased use of Holland Lake trail into the Bob Marshall? The facts are simple, those studies haven't been done because there can be little doubt the results would not support this expansion. These studies would make the use of a Categorical Exclusion look nearly criminal in its recklessness.

We are told that the project is merely in the planning stages and more complete information will be coming soon. Perhaps in the next phase of comments. The illegal construction trailer doesn't seem to be needed for the planning stage. Why is it there? The new well approval doesn't seem like planning stages to me, it seems like a fast tracked approval. That is just what POWDR asked for and was likely to receive before all this dust got kicked up by locals. Before it became obvious that the public was going to fight this and require proper analysis by authorities, I have little faith that a thorough analysis was planned. From the very first meeting the public has been treated with an emotion that neared contempt but never really made it there. A feeling that with the use of the Categorical Exclusion Mr. Steele could crown himself king of the Flathead Forest (and allow any project despite public outcry or the processes laid out by the Forest Service) started to grow every time a question went unanswered or was stepped around. My past experience with the Forest Service is that of an agency who is willing to go to exhaustive levels of analysis to guarantee a project is equitable for all stakeholders. This process has been a major departure from the past. It seems clear to me from all of the amazing comments that have been entered by former government employees and land managers that in their expert opinions this is a vast

departure from the best practices they used their entire careers. I'm no expert on the issue of leasing land and opportunities from the government but those who are seem appalled by what has occurred here. Legends of conservation in the United States and Montana have commented here letting you know that the process thus far has been vastly inadequate to determine the changes this expansion would foist upon the endangered species that are using this special place to make a fragile recovery. We as a society have stated that we value these species. We wish to make a place for them in our world and we have crafted laws to protect them; we insist that now and always the Forest Service follow these guidelines stringently in making all decisions. As a nation we have sacrificed an untold fortune in natural resource extraction to create a space for these creatures, it seems a slap in the face to all those who've lived with less in the past as to abide by the law, to now allow POWDR to push all regulation to the side with the use of a Categorical Exclusion.

In my efforts to let the citizens of this nation know about this project there has been an overwhelming number of negative emotions. Not just people frustrated with the process but citizens with a visceral reaction of "how can they do this!" How can they violate their own policies and regulations to jam this down our throat? People are angry about the optics of a government entity that has so clearly sided with a private company despite the outrage of the public, a public that understood the Forest Service to be staffed by public servants. People we assumed worked for us or were at least willing to appear impartial. The Forest Service oversees thousands of leases. Can those that lease from you expect to receive a Categorical Exclusion for any project smaller than the Holland Lake Lodge expansion? Can cabin owners feel free to drill new wells and cut trees before receiving written Forest Service approval? Will the lake be filled with floating docks as citizens seek to enjoy the same rights and privileges afforded to wealthy corporations? What effect will this decision have on the relationship of the everyday citizen and the Forest service? For this citizen it has forever ruined a favorable view I've held since birth. Montanans that trust the Forest Service are becoming an endangered species and proper thought should be given to their protection and recovery.

This decision seems to be one of those that tests the internal strength of an organization. This decision, with so much on the line, will test the limits of policy and people. Will the vast corporate interests of POWDR outweigh the institutional rigidity of the Forest Service? The policy seems to be quite clear according to expert after expert. This project does not fit under the stipulations put forth for a categorical exclusion. The use of one seems so inappropriate one has to wonder why it was even proposed. Why would we forgo standard steps for such a massive and consequential project? How is the public well-served by abandoning these boiler plate conservation policies? The fact is we deserve the best scientific study and thoughtful consideration that is currently available for a judgement of this scope.

Holland Lake will always be far more valuable than any Lodge that could possibly be built there. There is no doubt why people come there. It's not for the buildings, it's for the lake. The lake and surrounding area are of far more value to the public than any project could possibly be. If the answer to saving the lodge is to destroy the lake then the responsible thing to do is to let the lodge rot into the ground. To think even for a second that the public would be willing to destroy a public treasure like Holland Lake just to create fortunes for a few shows the lack of connection with the public. If the current owner was a good steward to the buildings and property the buildings would not be in such disrepair that they require a massive new complex to make repairs feasible and show a profit. Few of us can understand how the current business is not able to operate and serve the public need in its current form. The fact that this resort is not required for the lake to continue to serve the public need should not be ignored. The people of this state should not have to fund this private business; we refuse to exchange our lake as tender for POWDR's growth. It seems absolutely clear that this expansion will irreversibly change Holland Lake forever, taking it from future generations. The resources designed to help the public feel confident in the foresight of this decision do not exist. We cannot reference a complete Environmental Impact Statement rigidly prepared by an impartial professional. We cannot view a current accurate account of the actual acreage that is currently leased versus that which is slated for development. We are unable to reference and read trail use studies to assure us that we will still enjoy the access we now have to Holland Falls and the Bob Marshall. We don't have a detailed plan for the management of endangered species prepared by the third party experts at the FWP because there has been no communication between agencies.

In short we are being asked to go along with a MDP that seems wildly inaccurate and incomplete, and any resource that would give the public confidence to know the decisions were being made in our best interest are

incomplete at best. The expansion of Holland Lake lodge will end most of the things we all love about Holland Lake, there seems no way around that fact. The people of this nation deserve the right to view a full and accurate representation of this proposal. We deserve the full 60 day comment period after the updated and accurate plan is made available to the public. If this brief comment period has been any indication of the public interest in this proposal then one could imagine that a full comment period based on accurate information would illicit enormous public interest. Not to mention the amount of inaccuracies that have been uncovered in the short period of public review. In this short period of review thousands of experts have used their particular skills to craft comments of breadth and depth that paid commenters could never match. Honest opinions of people with decades of experience in pertinent area after pertinent area. The knowledge assembled in those comments could not be amassed with scores of paid mouthpieces. As there is already so many detailed and thorough comments into the minutia and specifics of this proposal and its affects, I will let them speak for themselves.

For myself I demand that you give the best of yourself to this decision. We require that you use every tool at your disposal to come to a decision that benefits this nation to the fullest capacity possible. I ask that the Forest Service declines this project in its current iteration. It's my heartfelt opinion that this project and POWDR are detrimental for the Flathead National Forest and Holland Lake.

Thank you for your consideration,

Travis Cole

Missoula, MT