September 16, 2022

USDA Forest Service Flathead National Forest Attn: Shelli Mavor, Project Lead Bigfork, MT

RE: Holland Lake Lodge 2022 Development Plan #61746

Dear Project Leader,

The "Project Detail" information provided online by the Flathead National Forest regarding the subject Holland Lake Lodge Project, refers to a "Categorical Exclusion". It is presumed that this exclusion refers to the Project as being excluded from further environmental review because it is at "...an existing recreation site...".

Further review on the website provided by the EPA, "A Citizen's Guide to NEPA – Having Your Voice Heard", January 2021, gives more detail involving Categorical Exclusions. "A CE is a category of actions that the agency has determined does not normally have a significant effect on the human environment. Examples include issuing administrative personnel procedures, making minor facility renovations (such as installing energy-efficient lighting), and reconstruction of hiking trails on public lands."

There can be no question that the proposal by POWDR to expand the Holland Lake Lodge includes much more impact than what is intended by NEPA for a Categorical Exclusion. It can easily be concluded that a full Environmental Impact Study of the proposed project is required.

I refer to an earlier comment letter sent to the Flathead National Forest project leader, Michelle Mavor, dated September 12, 2022, in which I asked that the USFS approve only an upgrade of the current Holland Lake Lodge facilities, and NOT approve an expansion. If the USFS does ultimately deem that an expansion should be considered, it is only prudent (both ethically and legally) that an Environmental Impact Study be required before any further consideration.

Sincerely,

Leo Heath

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