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Comments: I am opposed to the proposed expansion of the Holland Lake Lodge, as currently proposed. This proposal is not simply a renovation of the existing footprint of the lodge operation, this is a massive expansion of the footprint, square footage of buildings, parking footprint, and human impacts. The proposal will also generate a huge increase in septic discharge and lead to greater congestion on the road and exasperate an already bad dust problem.

The project proposal hardly scratches the surface of the potential environmental and social issues that are likely to occur if this project is approved. Additionally, the master plan repeatedly refers to the appendices for further justification of compliance with floodplain and sewer system issues, yet when you flip to the appendices, two of them are blank. Other issues that immediately jump out include proposing only a 20-foot setback from the lake shore for new building construction, a very shallow water table, density of proposed buildings and the likelihood that the additional sewage generated by the massive increase in lodging will hydraulically overload the sewer lines feeding the sewer lagoons, not to mention the lagoons themselves. Another issue that needs further analysis is historic preservation issues. The owner proposes to demolish ten existing structures of significant historical value. Further, independent environmental analysis is needed to fully evaluate the potential environmental impacts of this massive expansion of the lodge facility footprint. I request that the Forest Service require a full environmental impact statement before this project is approved.

In the Forest Service's notification letter, the Flathead National Forest proposes to categorically exclude the project from further environmental analysis, under 36 CFR 220.6(e)(22). As you know, the spirit of 36 CFR 220.6(e)(22) is to allow renovation, decommission and disposal of an "existing" structure. That is not what is being proposed for the Holland Lake. If the owners were proposing to renovate the lodge and existing cabins, then 36 CFR 220.6(e)(22) might apply. If the owners were proposing to dispose of the lodge or existing cabins, then 36 CFR 220.6(e)(22) might apply. Neither of these things are being proposed.

What is being proposed is a massive expansion from the existing six lodging buildings to a total of 35 buildings. The current lodge has a capacity of 50 guests, the new proposal would allow up to 156, more than triple the current max capacity. The proposed plan would have 73 parking spots. While it is difficult to determine the current parking capacity, suffice it to say that the proposed parking footprint is many times more than the current situation. All of these issues are proof that this is not a simple renovation of an existing recreation facility. This proposal is a massive expansion of the existing footprint and operation and falls far outside the spirit of a categorical exclusion under 36 CFR 220.6(e)(22). If the Forest Service proceeds with a categorical exclusion, it would demonstrate a reckless disregard for the agency's responsibility to fully evaluate a proposed action and leave your agency and the proposed action vulnerable to legal challenges. After all, it is the public's responsibility to hold the government accountable for compliance with its own rules, regulations and responsibility to protect the public from environmental harm.

I urge the Forest Service to proceed with a full environmental impact statement before any decision is rendered on the Holland Lake Lodge proposed expansion.