

Data Submitted (UTC 11): 9/9/2022 7:41:52 PM

First name: Chris and Julie

Last name: Nygren

Organization:

Title:

Comments: I am commenting on this proposal principally based on the fact that a preliminary determination was made this proposed project falls under a categorical exclusion to the performance of the detailed analysis required under NEPA. The specific exclusion cited was 36 CFR 220.6(e)(22) stating the proposal consisted of reconstruction of improvements at an existing recreation site. Granted the Holland Lake Lodge is an existing recreation site, however, in no manner does the current proposal have the same footprint, scope or effect upon the surrounding forest lands as existing Holland Lake Lodge improvements.

In a November 19, 2020 U.S. Forest Service summary of the recent changes to the USFS NEPA regulations, the agency states that the purpose of the revisions were in part to determine whether a NEPA analysis prepared for a previous activity could satisfy NEPA requirements for a new proposed action that was substantially the same. This "NEPA Adequacy provision" provides the basis for many of the categorical exclusions under 36 CFR 220.6, including that found in exclusion (e)(22) being utilized by the USFS for this project. A simple review of the facts contained in the current proposal to the existing improvements refutes the present USFS position on this proposal.

Presently, the existing lodge has between 8 to 10 rooms with a small restaurant of approximately 6 tables and an open gathering space with a fireplace and this building will remain in place under the new proposal. There are also five stand-alone cabins (not counting the owner's cabin) which will be removed. Estimated parking spaces total approximately 20 to 25 spaces. The new proposal consisting of 26 new cabins and a new 13,000 square foot lodge with 28 new rooms along with associated support buildings, including 136 parking spaces is far beyond any previous analysis performed (or most likely not performed since the existing lodge predates NEPA).

It is incredulous for the applicant to argue that any previous analysis would somehow be considered adequate and preclude the performance of a complete NEPA analysis as required under the law. A complete NEPA analysis by the USFS should be performed in regard to the current proposal, not just attempting to shirk it's responsibility by claiming a categorical exemption applies.

We do not necessarily oppose improvements to the recreation site, replacement of wells, creation of walking paths or improvement of the lodge/cabins or addition of additional cabins. However, U.S. regulations and statutes are clear that there is a process to follow and an analysis which must be performed when a proposal of this magnitude is made. Categorical exclusions are considered exceptions to NEPA and exceptions must not be allowed to swallow the rule in spite of the claimed need for such "improvements".

Sincerely,

Chris and Julie Nygren