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Comments: I have been visiting the Holland lake area for the last 30 plus years and am writing to voice my strong opposition to the proposed expansion of Holland Lake Lodge.

   In my opinion the Forest Service's decision to grant this project a categorical exclusion from an environmental assessment is clearly an incorrect interpretation of NEPA guidelines. The federal rule they are citing to justify this decision, 36 CFR 220.6(e)(22) does not support this decision by any stretch of the imagination. The FS supervisor and the developer both cite the text of the rule but they both also conveniently leave out the examples given in the regulation to show the intent of the rule. Of the examples given only two would even remotely apply. The first is example (i)Constructing, reconstructing or expanding a toilet or shower facility. The second is (ix)Reconstructing or expanding a recreation rental cabin. This plan more than triples the amount of square footage at the existing lodge. The plan contains a new 13,000 square foot building, over 20 new cabins, as well as several other new buildings. To conclude that development on this scale is equivalent to expanding a toilet or a rental cabin is ludicrous.

   Even if this rule did apply, which it doesn't, this project still wouldn't qualify for a categorical exclusion from an environmental assessment. Federal rules state that categorical exclusions cannot be granted if there are extraordinary circumstances present. On the NEPA list of extraordinary circumstances is the presence of threatened or endangered species, such as the grizzly bear. The master plan submitted by the developer makes the ridiculous statement that to their knowledge there have not been any sightings of grizzly bears on Holland Lake Lodge property or anywhere on the lake for the last 17 years. The FS well knows that grizzly bears are regularly encountered at the Holland Lake Campground, at the cabins on the other side of the lake, on the trails from the packer camp to the Bob as well as in the area between the highway and the lake. The FS Flathead National Forest Land Management Plan states that they wish to "Continue to maintain existing grizzly bear corridors in the upper Swan valley to maintain the connectivity between subpopulations in the Mission Mountain and Bob Marshall wilderness areas." This massive development would be in direct conflict with the FS own management plan for the area.

   The developers master plan includes the developer paying for an expansion of the currently congested public trailhead adjacent to the lodge as well as upgrading a few small sections of trail near the lodge. It appears that the FS supervisor considers that enough of a tradeoff to be willing to rule in defiance of NEPA regulations as well as the intent of the FS Management Plan for the area.

   Lastly, the developers master plan also states, without evidence, that visitor access is lacking in the Swan valley. On VRBO there are about 80 listings for the surrounding area. A quick google search shows that there are at least 15 hotels and lodges open to the public in the area. The developer's interest here is clearly not the public at large but rather their interest in maximizing their income on a publicly owned lease.

   I believe that an environmental assessment is required for this project for the reasons outlined.   Any well conducted environmental assessment would conclude that this project should not go forward as proposed. Currently on the FS website for this project there are about 900 public comment letters with over 99% being opposed. This project is not wanted by the public and is not needed by the public. I don't think there would be this level of public outcry if the new owners just wanted to remodel and update the lodge within its current footprint. The lodge has been operating at its current size for over 50 years and continuing "as is" would not change its effect on the public or on the wildlife.
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