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Comments: I am writing to comment on the proposed Holland Lake Lodge Facility Expansion. Like so many others I have been completely caught off base by the proposal, by the very short period of time to comment and by the US Forest Service seemingly endorsing the application of POWDR to do this under a categorical exclusion. The implications of the plan and the expansion of operations and the nature of the business model of POWDR suggest that impacts will be many and much wider spread than the USFS claims in their documents.

Like so many other Montanas, I have spent significant time paddling the lake, attending weddings and having dinner at the lodge, hiking to the Falls and generally enjoying the incredible beauty of Holland Lake. It is one of the true treasures of Montana.

But it's a resource that is already getting hit very hard with recreational use. The near-by camp ground is often at or beyond capacity and the trails, particularly to Holland Falls are often full of hikers. Expanding the parking area at the trailhead will not serve to eliminate this but will rather compound the crowding. It will lead to further congestion.

Its disheartening to see this being presented by both the US Forest Service and POWDR as just a way to improve the buildings and structures at Holland Lake Lodge. No one doubts that the Lodge needs some TLC but this proposal would triple the overnight capacity of the Lodge and significantly increase the footprint of the resort to the east of the old Lodge. These are significant impacts by themselves, particularly when you look at the setting that the Lodge is in. It is a major change from the way the area has been managed for the last 100 years.

POWDR Corporation is in the business of Adventure Lifestyles and has a large recreational footprint around the country. In order to recapture the large amount of capital invested in renovating and expanding the Lodge, POWDR will undoubtedly turn to expanding their recreational footprint in the Swan. What does that mean? They already state in their planning document that structures will be winterized for potential use in the winter season. Does this then imply, more snowmobiling the local trails or the need to expand operations again to allow for skiing? And will POWDR be asking in the future for guided floats on the Swan River or trips into the Bob Marshal for its clients? Seems logical. What are the impacts of those? Unfortunately we have already seen the huge impacts to the Blackfoot River and the Bob from a similar guest operation in the Blackfoot. The footprint of impacts of this Expansion is far greater than presented in the Scoping Document.

Further its stated that this will create 25 new jobs in the valley. But have you talked to any of the local businesses around Condon about finding employees for these sorts of jobs? They are hard to find and undoubtedly many will have to be brought in from out of the area and out of state to fill these jobs. More impacts not analyzed.

And this isn't even considering the impacts to protected species, wetlands, old growth forests, and the limits of reasonable recreational experience on the lake or adjacent areas.

It is very hard to believe that the Flathead Forest can just be a pass through for this proposal without any strong analysis, no critical thinking or realization of all the implied impacts resulting from it. What happened to stewardship?. These are public lands that should that should honor the past usage of the Lake and the area, and not embark on a brand new path of large private resorts and Adventure Lifestyles.

The impacts of a development like this are many and broad. It is not suitable for a categorical exclusion. That's just not sufficient. The USFS needs to prepare an Environmental Assessment and likely an Environmental Impact

Statement for a development of this scale and give the public the time to analyze these documents and potential impacts.

Thank you for the chance to comment.