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Title:

Comments: I have strong concerns about the proposed construction and expansion project for the existing Holland Lake Lodge lease site in the Flathead National Forest. As a general policy matter, I believe that the U.S. Forest Service should always employ a high level of environmental analysis and public involvement when considering expansions of, or changes to, existing leases of publicly-owned land. It does not appear to me that the Flathead National Forest is taking this approach with respect to POWDR's proposed expansion and construction at the Holland Lake Lodge lease site. Under the details of POWDR's proposal, there is no credible justification for the U.S. Forest Service attempting to use a categorical exclusion to National Environmental Policy Act (NEPA)-required environmental analysis, review, and public process. Aside from the obvious impacts presented by POWDR's proposed construction at the lease site, the proposal presents numerous extraordinary circumstances that preclude use of a categorical exclusion under NEPA. Two of the clearest extraordinary circumstances are: 1) potential impacts under the Endangered Species Act presented by the proposed construction; and 2) the controversy over the scope of impacts presented by the proposal. I want to be clear that, when I refer to controversy, I am not referring to just the controversy represented by citizens and parties opposing the proposed development on the basis of aesthetic, historic, or similar grounds. I am referring to controversy regarding how the proposed construction and development would impact: endangered species; the water table and groundwater; and Holland Lake vegetation and wildlife use/habitat. From a citizen perspective, the American public should be able to expect, and rely upon, a rigorous USFS examination of this proposal regarding those issues. From a taxpaver perspective. I believe that the U.S. Forest Service would spend less money conducting an Environmental Impact Statement at the outset of this process rather than employing a lesser standard of NEPA review and then having to try to defend it in the inevitable litigation that would follow use of a categorical exclusion or environmental assessment. Thank you for your consideration of my views. I have a great deal of respect for the U.S. Forest Service and its many dedicated employees. I, and my family, use Forest Service land often, including the Holland Lake area.