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Title:

Comments: Proposed changes to the Holland Lake Lodge permit include expansion to a new 28-room lodge, 10 two-bedroom cabins and 16 studio cabins, while the historic lodge would remain in place. Federal law (CFR 219.6 (b. (6-9)) requires the Flathead National Forest to assess the proposed development in light of:

- (6) Social, cultural, and economic conditions;
- (7) Benefits people obtain from the NFS planning area (ecosystem services);
- (8) Multiple uses and their contributions to local, regional, and national economies;
- (9) Recreation settings, opportunities and access, and scenic character;

Before retiring, I was a project manager for many proposed actions involving private, state and federal projects. Many of those proposed actions were triggered by NEPA-required consideration of substantive public controversy. I understand this expansion project has generated over 5,100 comments to the Flathead National Forest. This number of responses reflects an interest that requires an Environmental Impact Statement-level of agency response.

I believe that your agency misread the level of interest and controversy the proposed expansion has generated. You have made it much more difficult for yourselves to communicate with the public in the future regarding your agency's impartiality in being able to assess the impact of the expansion. Once again, Montanans are being asked to tolerate the loss of a beloved icon of serenity and peace to be replaced by a huge proposal from a mega out-of-state developer. And as so often happens, the reaction to this proposal illustrates an agency's difficulty with procedure, rather than substance in failures with the public reaction.

By re-assessing the level of evaluation required from a Categorical Exclusion to an Environmental Impact Statement I think the public would be assuaged that your agency is addressing the proposed expansion with a more adequate level of assessment to its impact on public lands.

Thank you for the opportunity to comment.