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Comments: The Flathead National Forest must deny the proposed major Holland Lake Lodge expansion by POWDR. The reasons are manifold. The two that come to the forefront for me are

1. POWDR's proposal is not in the public interest.

There is no documented need to dramatically expand (triple) the capacity of a commercial lodge on the Flathead National Forest, especially since such facilities and services are available elsewhere in the general vicinity. Increasing recreation use generally on the Flathead National Forest, or "increased demand for outdoor recreation", does not represent a demonstrable need for expanding private for profit lodging accommodations on National Forest System lands. The proposal will negatively affect numerous public values in the Holland Lake area

*Overwhelm already often overcrowded lake waters and area trails;

*Threaten Holland Lake's near-pristine water quality

*Reduce the amount and quality of habitat for wildlife species

As a result of these effects, POWDR's proposal would forever change the character of the Swan Valley negatively affecting the quality of life of its residents and the experiences of its visitors.

2. The Flathead National Forest's intention to categorically exclude POWDR's proposal from further analysis, documentation and public involvement violates 36 CFR 220.6

Forest Service regulations for implementing the NEPA state:

"A proposed action may be categorically excluded from further analysis and documentation in an EIS or EA only if there are no extraordinary circumstances related to the proposed action and if:

...

(2) The proposed action is within a category listed in 220.6(d) and (e)".

The Flathead Forest's September 1, 2022 Scoping Letter informed the public of the Forest Service's "intentions" to utilize the Categorical exclusion described at 36 CFR 220.6(e) (22), and included a portion of the regulatory description of that category. The Flathead National Forest misled the public by providing only half of the regulatory language of 36 CFR 220.6 (e) (22), omitting the examples. The examples reveal that this categorical exclusion is limited to proposed actions of much smaller scale with fewer and less significant environmental impacts than POWDR's proposal.

The scope, scale and environmental impacts of the POWDR's proposal are orders of magnitude beyond regulatory definition of categorical exclusion making it unlawful to use this lowest level of NEPA analysis for the POWDR's proposal.

If the Forest Service insists on further wasting taxpayers' funds and human resources on POWDR's proposal it must prepare EIS.