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First name: Anna

Last name: Semple

Organization:

Title:

Comments: I am writing to object to the expansion of the Holland Lake Lodge by POWDR. Specifically, the use of Categorical Exclusion to avoid a thorough environmental impact and review process is inappropriate for an expansion of this size. Categorical Exclusion is designed for small improvements, not for leveling of historic buildings and massively increasing the capacity of the lodge. The endangered species, including grizzly bears, existing in this area demands extra scrutiny of any property development. Skirting proper process on such a high-profile project is inviting lawsuits, making it a flagrant waste of taxpayer dollars. Additionally, it reduces trust in the Forest Service's ability to properly manage public resources.

In addition to my objection of the use of Categorical Exclusion, I also question the acreage of the new permit. The numbers of historic permits and the proposed permit do not line up, with no transparent explanations from Forest Service officials.

Finally, other leaseholders on Holland Lake do not get the option to simply expand their properties in a sale, and I don't believe an exception needs to be made for this lodge. Existing leaseholders are strictly required to limit new development, not clear trees for shoreline views, and generally not alter the rustic character of the buildings. I love recreating at Holland Lake, and choose to go to this lake over others in the area (Seeley, Placid, Salmon) because of it's more rustic and quiet nature. There is no need to make an exception to allow Holland Lake Lodge to change its character, footprint, and impact when this is not the precedent for Holland Lake leases.

I understand the use of Special Use Permits in cases where a recreation resource can be offered to the general public that would otherwise be inaccessible. Developing Holland Lake Lodge does not actually increase access in any way, as there are plenty of options for recreation existing in the area. Those seeking luxury lodging can find numerous nearby options on private land (where they belong). There is no reasonable explanation to support this expansion. Modest renovations that retain historical character, do not expand the footprint of the lodge, do not increase the size of the permitted areasa, and do not result in clearing of shoreline trees would be more likely to stand up to an full Environmental Impact Assessment, and would potentially be appropriate at this site.