



Rekindling the spirit and tradition of the Great Northwest!
Great Northwest

July 15, 2024

Via electronic transmission –

<https://cara.fs2c.usda.gov/Public/CommentInput?project=60600>

Regional Forester, Objection Reviewing Officer
Pacific Northwest Region, USDA, Forest Service
Attention: 1570 Appeals and Objections
1220 SW Third Avenue
Portland, Oregon 97204

**RE: Lake of the Woods Resort, LLC Objection to the June 2024 Draft
Decision Notice for the Lake of the Woods Resort Expansion Project**

Dear Objection Reviewing Officer:

Lake of the Woods Resort, LLC (LOWR) respectfully submits this objection to the June 2024 Draft Decision Notice, Environmental Assessment, and Finding of No Significant Impact for the Lake of the Woods Resort (Resort) Expansion Project (Project). The Project will enable LOWR to improve and enhance the high quality public recreation at the Resort. LOWR worked diligently with the Forest Service, the Lake of the Woods community, and other stakeholders to propose, and modify, the Project to maximize its beneficial effects to the recreation opportunities at Lake of the Woods and minimize potential adverse effects. LOWR submits this objection to preserve its right to participate in any objection resolution meetings that may occur, and to request the Forest Service to clarify in the Final Decision Notice the points identified below.

LOWR Supports Approval of the Modified Project

LOWR appreciates the Forest Service's thorough and thoughtful work on the Project. LOWR supports the decision to approve the modified Project identified in the draft Decision Notice. LOWR supports the elimination of the additional RV park. The aggregate elements of the modified Project are critical to LOWR's ability to continue to offer high quality public recreation at the Resort, the only public recreation facility on public lands at Lake of the Woods. LOWR supports and agrees with the Forest Service's conclusions that, based on the thorough Environmental Assessment, the adverse "effects of the proposed action were found to be minimal," and "there are no added long-term

"Creating An Experience Worth Repeating"

Phone 541-949-8300 • Toll Free 866-201-4194 • 950 Harriman Route • Klamath Falls, Oregon 97601-8518
Visit us online @ www.lakeofthewoodsresort.com



effects anticipated from implementation of the proposed action.” Draft Decision Notice at 7.

Information Required by 36 C.F.R. §§ 218.8(d) and 218.9

LOWR has standing to submit this objection pursuant to 36 C.F.R. § 218.5(a). LOWR participated in the planning process, including by submitting written comments on the agency's scoping notice, and by submitting written comments on the draft Environmental Assessment. *See* Exhibit A. LOWR timely submits this objection within 45 days of publication of the legal notice in the Klamath Falls Herald & News on June 5, 2024. LOWR provides the following information pursuant to 36 C.F.R. § 218.8:

Objector's Name and Address (36 CFR § 218.8(d)(1)):

John Doherty
Lake of the Woods Resort, LLC
950 Harriman Street
Klamath Falls, Oregon 97601
(541) 882-4326

Name of Proposed Project, responsible official, and location (36 C.F.R. § 218.8(d)(4)):

Name of Proposed Project: Lake of the Woods Resort Expansion Project
Responsible Official: Forest Supervisor Erik Fey
Location: Fremont-Winema National Forest, Klamath Ranger District

The issues raised in this objection are based on LOWR's prior written comments, *see* Exhibit A, or issues arising after the public comment period. 36 C.F.R. § 218.8(d)(6).

LOWR's Requests for Clarification.

LOWR supports the Forest Service's proposed decision to approve the modified Project identified in the draft Decision Notice. LOWR requests the following clarifications in the final Decision Notice.

"Creating An Experience Worth Repeating"

Phone 541-949-8300 • Toll Free 866-201-4194 • 950 Harriman Route • Klamath Falls, Oregon 97601-8518
Visit us online @ www.lakeofthewoodsresort.com



Rekindling the spirit and tradition of the Great Northwest!
Great Northwest

The Forest Service should clarify that it provided more public participation and comment opportunities than required.

The draft Decision Notice describes the extensive public process that the Forest Service conducted in reviewing the Project. The agency invited public comments in response to its September 17, 2021 scoping notice, and in response to its separate October 15, 2021 written notice to owners of private cabins around Lake of the Woods. Also in October 2021, the agency provided a public open house, and two public tours of the Resort. The agency conducted a separate, second public comment opportunity beginning on October 4, 2023 with release of the draft Environmental Assessment.

LOWR appreciates the extensive public process that preceded issuance of the draft Decision Notice. As the Forest Service is aware, applicable law requires one, not two, public comment periods for a decision based on an Environmental Assessment. LOWR requests that the Forest Service clarify in the final Decision Notice that the public comment opportunities, and public process, were more extensive than legally required.

The Forest Service should clarify that the final Decision Notice will improve and enhance the Resort, not expand it.

The Forest Service's name for the Project is the Lake of the Woods Resort Expansion Project. The word "expansion" suggests that the final Decision Notice may authorize more material adverse consequences than proposed in the modified Project.

With the elimination of the RV park, a modification that LOWR agrees with, the aggregate elements of the modified Project mostly upgrade, enhance, and improve existing facilities rather than propose significant expansions of those facilities. The improvements are critical, and needed, at the century old Resort. The draft Decision Notice correctly notes that the ten new cabins in existing RV sites, the additional employee housing, additional parking, and improvements to the dock and marina "will modestly expand capacity," rather than materially increase capacity. The draft Decision Notice rationally notes "we do not expect a significant increase in visitation levels" from the collective improvements in the modified Project. Draft Decision Notice at 7. Given the modest actions proposed, LOWR requests that the Forest Service further clarify that implementation of the modified Project is not anticipated to materially expand visitation or use of the Resort.

"Creating An Experience Worth Repeating"

Phone 541-949-8300 • Toll Free 866-201-4194 • 950 Harriman Route • Klamath Falls, Oregon 97601-8518
Visit us online @ www.lakeofthewoodsresort.com



Rekindling the spirit and tradition of the Great Northwest!
Great Northwest

The Forest Service should clarify that the Resort and the campgrounds managed by LOWR provide the only public access to public lands at Lake of the Woods.

The lodging, marina, lodge, restaurant, campgrounds and day-use areas at the Resort provide critical public access to and recreation at Lake of the Woods. LOWR appreciates and supports the proposed decision to authorize LOWR to improve the Resort because it provides much needed public recreation facilities. Simply put, the Resort and the campgrounds operated by LOWR are the only truly public recreation amenities at Lake of the Woods.

Although all the lands around Lake of the Woods are public lands within the National Forest System, public access and public recreation facilities at Lake of the Woods are surprisingly limited. That is because the Forest Service in the past authorized private and special interest uses at Lake of the Woods rather than public recreation facilities. Figure 2 in Appendix 1 of the Environmental Assessment illustrates this. There are 218 privately owned recreational residences on National Forest System lands at Lake of the Woods. See Capacity and Needs Analysis at 7. These residences are the black dots on the shoreline of the lake in Figure 2. Those are private homes on public lands that the Forest Service authorized for private ownership and private use that are not available to the public.

The Forest Service also authorized three organizational camps operating under special use permits on the lake. The Boy Scouts of America manages one. The YMCA manages another. The Church of Jesus Christ of Latter Day Saints manages the third. *Id.* at 8. None of the organizational camps are open to the public for daily public access to Lake of the Woods. Access to these camps is limited to members of the public that belong to these organizations or subscribe to their religious and cultural beliefs.

LOWR supports, appreciates, and welcomes its neighbors on Lake of the Woods, many of whom support the Project and are valued visitors to the Resort. LOWR does not seek by this factual observation to criticize past decisions by the Forest Service that privatized so much of the potential public access and recreation at Lake of the Woods. LOWR appreciates that the Forest Service recognized in the draft Decision Notice, and in the Environmental Assessment, the demonstrated public need and public demand for improved and upgraded public recreation facilities at the Resort. That need and demand is compelling given the absence of other public facilities on public lands at Lake of the Woods. LOWR submits that the imbalance of private vs. public facilities at this public

"Creating An Experience Worth Repeating"

Phone 541-949-8300 • Toll Free 866-201-4194 • 950 Harriman Route • Klamath Falls, Oregon 97601-8518
Visit us online @ www.lakeofthewoodsresort.com



Rekindling the spirit and tradition of the Great Northwest!
Great Northwest

resource tips sharply in favor of the Forest Service adopting the draft Decision Notice as its final Decision.

LOWR requests that the Forest Service clarify in the final Decision Notice that the Resort, its facilities (including parking) and the campgrounds managed by LOWR provide the only truly public recreation amenities at Lake of the Woods. That fact is a material reason why authorizing LOWR to improve and upgrade the Resort via the modified Project is in the public interest.

The Forest Service should clarify in the Decision Notice that the Project will beneficially effect the public recreation opportunities and experience at Lake of the Woods.

The draft Decision Notice states that implementation of the Project “would not result in significant impacts related to the quality of recreational opportunities, visitor conflicts, or visitor access.” Draft Decision Notice at 7. The Forest Service should clarify in the final Decision Notice that the Project will result in needed, beneficial upgrades to the recreation opportunities at Lake of the Woods while minimizing potential adverse impacts.

The Project includes upgrades to the Resort’s septic system, dock renovations to improve safety and availability, transportation upgrades that alleviate congestion and increase safety, and the addition of new cabins to meet an existing demand by families and other members of the public that do not own RVs. The final Environmental Assessment accurately states that all of the Project components are needed to upgrade existing facilities and to meet public demand for additional or different recreation opportunities. Final Environmental Assessment at 4-5.

The draft Decision Notice is correct that implementation of the Project will not result in adverse impacts to the environment or the recreation experience at Lake of the Woods because the Project will occur in the developed footprint of the Resort and will not materially increase visitation to the area. But the Project will greatly improve the recreation experience and opportunities at the Resort. The Forest Service should clarify this fact in the final Decision Notice.

LOWR appreciates the efforts of the Forest Service in preparing the detailed analysis in the Environmental Assessment and the thorough and thoughtful draft Decision

“Creating An Experience Worth Repeating”

Phone 541-949-8300 • Toll Free 866-201-4194 • 950 Harriman Route • Klamath Falls, Oregon 97601-8518
Visit us online @ www.lakeofthewoodsresort.com



Rekindling the spirit and tradition of the Great Northwest!
Great Northwest

Notice. Thank you for considering this objection. LOWR requests and looks forward to an objection resolution meeting with the Objection Reviewing Officer, and requests the opportunity to participate in objection resolutions meetings held with other objectors.

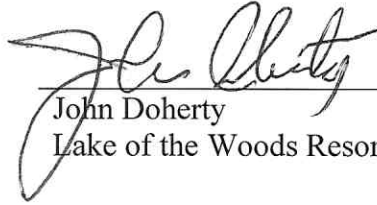
"Creating An Experience Worth Repeating"

Phone 541-949-8300 • Toll Free 866-201-4194 • 950 Harriman Route • Klamath Falls, Oregon 97601-8518
Visit us online @ www.lakeofthewoodsresort.com



Rekindling the spirit and tradition of the Great Northwest!
Great Northwest

Sincerely,



John Doherty
Lake of the Woods Resort, LLC

cc: Erik Fey, Forest Supervisor
Melanie Fullman, District Ranger
Zeke Williams, Esq., Counsel to Lake of the Woods Resort, LLC

"Creating An Experience Worth Repeating"

Phone 541-949-8300 • Toll Free 866-201-4194 • 950 Harriman Route • Klamath Falls, Oregon 97601-8518
Visit us online @ www.lakeofthewoodsresort.com

Exhibit A

Lake of the Woods Resort
950 Harriman Rt.
Klamath Falls, Oregon 97601

October 31, 2023

Submitted via Email: comments-pacificnorthwest-winema-klamath@usda.gov

Erik Fey
Forest Supervisor – Responsible Official
Fremont-Winema National Forest
Attn: NEPA Planning
2819 Dahlia Street, Suite A
Klamath Falls, Oregon 97601

RE: Lake of the Woods Resort, LLC Comments on Draft EA for LOWR Expansion Project

Dear Forest Supervisor Fey:

Lake of the Woods Resort, LLC (LOTWR) respectfully submits these comments on the Draft Environmental Assessment (EA) for the Lake of the Woods Resort (Resort) Expansion Project. LOTWR appreciates the Forest Service's partnership, coordination, and work to get the Project to this stage of the review process, and one step closer to implementation.

The proposed Project is not new. LOTWR and the Forest Service have worked diligently over the last six years to design the Project, and its individual components, to maintain, enhance, and improve the public recreation experience for public visitors to the Resort and Lake of the Woods. The Project is needed to accommodate a known demand for improved public recreation facilities at the Resort and Lake of the Woods.

LOTWR appreciates the opportunity to comment on the Project. Please add these comments to the administrative record for the EA.

1. LOTWR and the Forest Service have worked diligently for over five years on the Project, and it has been subject to extensive study and public input.

The Project development and review process summarized in the EA has been exhaustive, encyclopedic, and thorough—and has taken over five years.

LOTWR first developed and proposed the Project components in its 2018 Master Development Plan (MDP). LOTWR worked with the Forest Service for over a year to develop and refine the MDP. The Forest Service accepted the MDP on October 1, 2018. The MDP is

detailed and thorough. All of the elements of the Project are identified in, and are consistent with, the accepted MDP.

LOTWR submitted a formal project proposal letter to the Forest Service in February 2020. The Forest Service subsequently required a comprehensive Capacity and Needs Analysis (CANA) to “assess visitor experience, expectations, general use of the areas, and identify overuse or opportunities for expanded experience” at Lake of the Woods and Fourmile Lake. *See Capacity and Needs Analysis: Lake of the Woods and Fourmile Lake Recreation Areas*, 4 (March 2021) (the CANA). LOTWR participated in funding the CANA and the collection and analysis of data about the Resort and Lake of the Woods. The CANA is a significant planning effort. The CANA analyzes visitor experiences, expectations, and use data. The CANA identifies a need for each of the proposed Project components, and supports the EA and the anticipated draft Decision Notice.

LOTWR submitted a supplemental project proposal letter in January 2021 following completion of the CANA, and its review and acceptance by the Forest Service. The Forest Service accepted the project proposal letter and published the Project on the Forest Service’s Schedule of Proposed Actions (SOPA) in January 2021.

Publication on the SOPA initiated analysis, review, and public comment under the National Environmental Policy Act (NEPA). That process exceeds—in detail, public input opportunities, and duration—any public NEPA review process that LOTWR is aware of undertaken by the Forest Service involving Lake of the Woods. This process has involved: a public meeting, two public tours of the proposed Projects at the Resort, two scoping notices, and an extended 44-day public comment period. The Forest Service has now initiated a *second* public comment period through its publication and request for comments on the Draft EA, exceeding the legal requirements for public comment under NEPA and Forest Service regulations. *Bering Strait Citizens for Responsible Res. Dev. v. U.S. Army Corps of Engineers*, 524 F.3d 938, 952-53 (9th Cir. 2008); 36 C.F.R. § 218.5(a); 36 C.F.R. § 220.4(e). Release of the Final EA and draft Decision Notice will provide another opportunity for public review and input because it will be subject to the Forest Service’s public pre-decisional objection and review process set forth in 36 C.F.R. Part 218.

Throughout this extensive process, LOTWR has worked cooperatively to respond to the comments of the agency and the public. The Project currently being proposed and analyzed is the result of these efforts and review.

LOTWR requests that the Forest Service note in the Final EA and Draft Decision Notice that the EA and Project are the product of multiple public input opportunities, including two public comment periods.

2. The Project provides public access to the public lands at Lake of the Woods.

The lodging, marina, lodge, restaurant, campgrounds and day-use areas at the Resort provide critical public access to and recreation at Lake of the Woods. The Forest Service should

prioritize the development of needed public recreation facilities at the Resort because the Resort and the campgrounds operated by LOTWR are the only truly public recreation amenities at Lake of the Woods.

Although all the lands around Lake of the Woods are public lands within the National Forest System, public access and public recreation facilities at Lake of the Woods are surprisingly limited. That is because the Forest Service in the past authorized private and special interest uses at Lake of the Woods rather than wholly public recreation facilities. Figure 2 in Appendix 1 of the Draft EA illustrates this. There are 218 privately owned recreational residences on National Forest System lands at Lake of the Woods. *See* CANA at 7. These residences are the black dots on the shoreline of the lake in Figure 2. Those are private homes on public lands that the Forest Service authorized for private ownership and private use that are not available to the public.

The Forest Service also authorized three organizational camps operating under special use permits on the lake. The Boy Scouts of America manages one. The YMCA manages another. The Church of Jesus Christ of Latter Day Saints manages the third. *Id.* at 8. None of the organizational camps are open to the public for daily public access to Lake of the Woods.

LOTWR supports, appreciates, and welcomes its neighbors on Lake of the Woods, many of whom support the Project and are valued visitors to the Resort. LOTWR does not seek by this comment to criticize past decisions that privatized so much of the potential public access and recreation at Lake of the Woods. LOTWR submits that the demonstrated need and demand for improved and upgraded public recreation facilities at the Resort is compelling given the absence of other public facilities on public lands at Lake of the Woods. The Forest Service should take into account these facts in the Final EA and the Draft Decision because the imbalance of public vs. private facilities at this public resource tips sharply in favor of authorizing the Project.

LOTWR requests that the Forest Service acknowledge in the Final EA and Draft Decision Notice that the Resort and the campgrounds provide the only truly public recreation amenities at Lake of the Woods.

3. The Project is consistent with and accomplishes objectives in the Forest Plan.

The Draft EA identifies four important recreation goals from the Forest Plan for the Winema National Forest. Draft EA at 9. The Forest Plan identifies two objectives to help meet these goals:

Upgrade existing sites to provide customer-desired facilities, and develop partnership with user groups, permittees, and other recreation providers and promoters to develop, improve, and market recreation opportunities.

Concentrate on upgrading, expanding, and adding facilities primarily within existing recreation complexes to meet the projected demand for developed camping and associated activities.

Id.

The Project satisfies the Forest Plan objectives and helps implement the Forest Plan goals. The Project will upgrade and enhance the recreation facilities at an existing permitted recreation site, operated by an existing permittee, to meet existing and projected demand and provide customer-desired facilities documented in the Draft EA and in the CANA. The Project implements the Forest Plan direction for Lake of the Woods Resort to continue to provide group and family use opportunities at the Resort. *See* Winema Forest Plan, at 4-100.

LOTWR requests that the Forest Service state in the Final EA and Draft Decision Notice that the Project is consistent with and accomplishes objectives in the Forest Plan.

4. The recreation improvements come at no cost to the Forest Service.

The Resort has provided public recreation on the public lands at Lake of the Woods since the 1920s. The Resort provides a family recreation experience with clean, comfortable accommodations and facilities in a rustic setting on National Forest System lands. The Resort has consistently worked to upgrade, improve, and expand the services it provides the public. The Resort now provides year-round access, lodging, dining, and hosts innovative events like the annual winter kite fest. The Resort is a treasured part of the Lake of the Woods culture and community.

LOTWR provides these public services and amenities at no cost to the Forest Service or the United States. That is a purpose and benefit of the Forest Service's special use permit program. LOTWR as a private permit holder invests in the development, maintenance, and improvement of the Resort's facilities at no cost to the Forest Service or the United States. Via this partnership, the public and the United States benefit.

LOTWR requests that the Forest Service explicitly acknowledge in the Final EA and Draft Decision Notice that the Project improvements will occur at no cost to the Forest Service or the United States.

5. There is a demonstrated need for the Project.

LOTWR worked carefully, in coordination with the Forest Service, to design the Project proposal based on the accepted Master Development Plan. LOTWR proposed the Project to maintain, enhance, and improve the experiences for public visitors to the Resort. This Project is needed to meet an existing demand for improved and expanded public recreation facilities and access at the Resort. The CANA also demonstrates the need for the Project. The CANA is an exhaustive planning effort that identifies recreation and capacity needs of Lake of the Woods and Four Mile Lake recreation areas. The CANA identifies a need for, and supports the authorization of, each of the Project components.

The following Project components are LOTWR's priority projects for authorization and implementation. They are needed, now, for LOTWR to meet the need and demand for improved recreation amenities at the Resort.

Roads and Transportation (EA at 5-6). The road expansion and addition of new parking spaces are needed to accommodate current public demand and use, and allow for the safe and efficient operation of the Resort. The CANA identifies a need to develop up to 100 additional parking spaces at the Resort and Rainbow Bay Day Use Area, "to alleviate access wait lines and roadside parking," and a new dedicated access lane to the Resort for "safe ingress and egress." CANA at 42.

Staff Housing (EA at 6-7). New RV sites for staff housing are needed to provide high-quality housing to accommodate LOTWR's staffing needs. The provision of clean, comfortable staff housing is critical to the Resort's ability to hire qualified and dedicated employees, and to provide high-quality guest services to public visitors to the Fremont-Winema National Forest. New RV sites, with full hookups, are a dependable and efficient way to meet the need for dedicated housing for seasonal employees. The CANA identifies a need and opportunity for the development of additional staff housing, in the form of new RV sites, in the Work Center area of the Resort. CANA at 35-36.

Dock Renovation (EA at 7). Increased dock parking at the Marina is needed to accommodate an existing demand for tie-up space at the Marina on busy days when the demand for temporary boat parking at the Marina exceeds capacity. The CANA recommends development of 10 additional dock spaces to meet this demand. CANA at 38-39, 43.

Septic System (EA at 8). The proposal to upgrade existing RV sites 18 through 27 to full hookup sites with septic is needed to enhance the visitor experience on the public lands at the Resort, meet an increased demand from the public for full hookup RV sites, and to upgrade these existing sites to help offset the loss of existing full hookup when new cabins are installed in existing RV sites as contemplated by the Settlement Stipulation, the MDP, and LOTWR's special use permits. The CANA identified that visitors to the Resort commented on the lack of enough electric/water/sewer hookups, and that there is a need for additional full hookup RV sites. CANA at 34-35, 36.

Additional Resort Cabins (EA at 7-8). There is a need for 10 additional cabins at the Resort. Current demand far outstrips availability and supply. Cabins are popular with families with children that may not camp, or have an RV. There is a need to provide additional cabin accommodations to avoid limiting the population capable of visiting the public lands at the Resort and staying in comfort to those who can afford to own, store, and operate an RV. During the peak summer season when school-age children are on summer vacation, LOWR frequently turns away families who want to experience the National Forest with their children by renting a cabin at the Resort due to a lack of availability. The Resort also operates year round. Winter visitation and occupancy has grown since LOWR took ownership of the property and continues to grow. Individuals and families visit to cross-country ski, play in the snow, ice fish, snowmobile, and attend the annual winter kite festival. There is a need for additional cabins to meet an existing and growing demand for winter-appropriate accommodations at the Resort not

limited to those who own an RV, or are interested in renting an RV. The CANA clearly identifies the need for additional cabins at the Resort. CANA at 36-37, 42.

LOTWR requests that the Forest Service authorize the listed Project components to allow the Resort to satisfy the existing, demonstrated need for improved and expanded public recreation facilities at the Resort.

6. LOTWR urges the Forest Service to complete this process as quickly as practicable.

The Project carries forward LOTWR's legacy, in partnership with the Forest Service, of providing high-quality recreation opportunities for the public on public lands within the Resort's special use permit boundary. The Project is needed to meet an existing, demonstrated demand for additional and improved facilities at the Resort.

Five years have passed since the Forest Service accepted the Resort's 2018 MDP. Over three years have passed since LOTWR submitted its first project proposal letter in February 2020. The Forest Service and LOTWR prepared a comprehensive CANA that far exceeds the level of study and analysis typically seen for comparable projects at recreation facilities authorized by special use permits on National Forest System lands. Over two years have passed since the Forest Service first initiated scoping on this project, more than doubling the typical time for comparable projects in the Fremont-Winema and Forests across the country.

The Council on Environmental Quality's NEPA regulations require federal agencies to complete and publish an EA and FONSI within one year "from the date of agency decision to prepare an environmental assessment." 40 C.F.R. § 1501.10(b)(1). Congress codified this mandate in its recent NEPA amendments. 42 U.S.C. § 4336a(g)(1)(B). That deadline passed over a year ago. Please issue the Final EA and Draft Decision Notice as quickly as practicable.

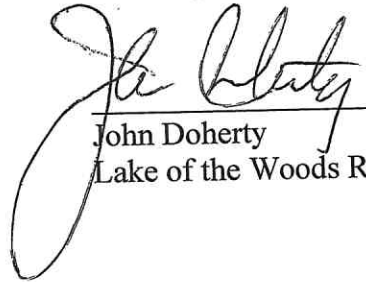
LOTWR urges the Forest Service to publish the Final EA and Draft Decision Notice with the proposed action intact, and to complete this process as quickly as practicable.

LOTWR appreciates its longstanding partnership with the Forest Service, and thanks the Forest Service for its dedicated work preparing the Draft EA. LOTWR looks forward to continuing to work cooperatively with the Forest Service and other stakeholders to bring this project to fruition.

Public access and public recreation facilities at Lake of the Woods are limited to the Resort. Private cabins and special-interest camps make up a significant portion of the permitted facilities at Lake of the Woods. The Project is needed to meet a known demand and demonstrated need for improved public recreation facilities at Lake of the Woods. The Forest Service should authorize the Project because the Resort and the campgrounds provide the only

truly public facilities, recreation amenities and public access at Lake of the Woods to meet this known public need.

Sincerely,

A handwritten signature in black ink, appearing to read "John Doherty". The signature is written over a horizontal line.

John Doherty
Lake of the Woods Resort, LLC