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Comments: This is a comment in opposition to the proposed modifications to the Holland Lake Lodge permit.

The requested changes will overwhelm the lake, overburden the existing infrastructure and swing the use from public access at low fees to restricted access at high price points. (Campground users will be displaced if the 152 guest per night hotel is built and the USFS then determines that the Recreational Carrying Capacity of the lake is too small to support the 40 campground users and the hotel guests and workers.) The likely decision will be to support the permit holder who has "just invested millions of dollars" rather than retaining the existing camping uses.

There has been an incredible amount of public funding in the last 15 year to protect endangered species in the Swan Valley. The USFS should not support this huge, new private, profit-driven development to degrade those public investments. Examples of public investments include the Montana Legacy Project (2008-2010) through the Holland Lake Project (2017).

It is shameful that the USFS is proposing this expanded use under a categorical exclusion from EIS/NEPA. It is 180 degrees from their statements of how Holland Lake is a vital wildlife habitat that needs protection. The Holland Lake Project of 2017, which transferred the 640-acre section directly west of the lake (approximately 1.2 miles from the Lodge) has a web site that praises the land acquisition (#8 priority of the Land and Water Conservation Fund that year) where it praises the purchase and transfer to USFS for protecting this "vital habitat for species protected by the Endangered Species Act. This area supports populations of federally threatened bull trout, grizzly bear, and Canada Lynx, as well as gray wolves, elk, moose, deer, mountain lions and wolverines." (The full statement can be found at this URL -- <https://www.fs.usda.gov/detail/flathead/workingtogether/?cid=FSEPRD557238>)

I have attached pictures of the lake in context to the "Holland Lake Project" to show the proximity of this "vital habitat" to the lake and lodge and to also show the existing campground and other public use recreational amenities. The Flathead National Forest Land Management Plan lists the Holland Lake \*CAMPGROUND\* (593 acres) as a management area 7 facility. The Lodge (10 acre permit site) is not mentioned in the amenities in the MA7 listing. This picture shows the built environment of the campground (mostly roads) and the lodge. Imagining the proposed high density new development east and north of the existing lodge is easier in context of a picture of the full lake.

It's too big.

It doesn't fund the necessary infrastructure improvements. The plan has a sewage upgrade but not road upgrade nor plan to fund additional, near-certain, emergency service improvements.

It is distressing that the Forest Service has added 5 acres to the Lodge permit holdings without public notice or comment. The Wohlfeil permit is for 10 acres, yet this proposed modification is for 15 acres.

Historic preservation and Heritage values need more than just a nod. The lodge should be preserved and the site should be respected. Heritage is not in the proposal which calls for building a large restaurant adjacent to the lodge and a very large hotel and large parking lots to surround the historic building.

The property has been run for the last few years as a destination wedding venue where weddings book the exclusive use of the lodge for Thursday, Friday and Saturday nights. I believe this has been profitable -- without

access to the financials it is impossible to say for sure. This has allowed public use of the venue - exclusively by wedding guests on 3 days of the week and open to the general public on the other days. At the same time the permit holder has repeatedly tried to sell the concession. The proposal suggests that there is a large backlog of deferred maintenance which cannot be funded except through this new corporate financing and a raze and replace strategy. This maintenance backlog should not excuse nor permit this outsize development by a new corporate owner.

' "Demolition by Neglect" is the term used to describe a situation in which a property owner intentionally allows a historic property to suffer severe deterioration, potentially beyond the point of repair. Property owners may use this kind of long-term neglect to circumvent historic preservation regulations...Property owners using demolition by neglect as a tactic to work around preservation laws will often argue that the prohibitive cost of repairs and deferred maintenance creates an economic hardship....Ideally historic preservation ordinances need a safeguard provision to protect against this kind of argument... Generally, the owner's own neglect should not be allowed to create an economic hardship.'

\* <http://www.preservationsacramento.org/demolition-by-neglect>