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Comments: Dear Flathead National Forest Officials: Holland Lake is an iconic recreation site in Western Montana because of its location near the Bob Marshall Wilderness and historical use since the early 1900s, when the Forest Service encouraged private recreation development as a hedge against resource extraction and to create a broader public appreciation of National Forest system lands. It has very strong local and regional public attachments.

Therefore, any new development at Holland Lake should be done with sensitivity and creativity, and not simply cater to jobs, expanding recreation opportunities, or corporate sales pitches about "adventure lifestyles" for tourists now streaming to Montana.

So, while current POWDR proposal falls within the 5-acre Forest Service permit area, a new lodge, restaurant, welcome center, parking areas and other facilities considerably enlarge the original development footprint in what is a highly-sensitive scenic lakeside setting. I thus strongly encourage the Forest Service to consider the scale of this development and the impact it will have on this small lake and its forested surroundings. In a word, it should be down-scaled. For example, is a Welcome Center really necessary? Two large parking areas? And so forth.

In fact, in the current analysis, I see little information about the anticipated increase in visitation that the new development could bring to Holland Lake and the Seeley Lake Valley--just lodge and cabin capacity. Moreover, there is little information about potential revenue generation. The analysis never truly displays what a far busier and bustling place Holland Lake would become. Simply stated, this is a MAJOR resort development, not minor improvements as the scoping letter and analyses rather benignly suggest.

The 1940s-vintage lodge and associated buildings are eligible for listing in the National Register of Historic Places. I understand that the lodge is in serious need of repair. Still, I would strongly encourage the Forest Service and developer to include an analyzed alternative that considers the cost of rehabilitation and adaptive reuse of the existing lodge, with a bona fide architectural analysis and cost estimate, and NOT something quickly ginned up quickly by the project engineer (believe me, that happens). There are plenty of qualified historical architects in Missoula and elsewhere that do such analyses.

I see that the old lodge would be "fixed up" in some ways as "mitigation" under NHPA Section 106. In my experience, this approach is actually a death sentence because "dinosaur" buildings invariably suffer from disinterest and neglect, and are eventually torn down, sometimes with Section 106 considerations, sometimes without.

Indeed, POWDR's financials & debt burden suggest that they now struggle to keep their other ski resort operations afloat, so I cannot imagine an old building aside a spanking new modern one will be much of a financial priority. So, to reiterate, rehabilitation-restoration adaptive reuse is one way to avoid this sad fate if the historic lodge still served as the lodge or the welcome center or restaurant.

Since the lodge and some of the cabins are part of a National Register district, their disposal will likely require careful & full recording as mitigation under Section 106 (a site form will not do). Putting up old pictures of torn-down buildings is a nice gratuitous gesture, but it isn't mitigation.

I'm happy to see that the new proposed buildings will be designed in a compatible Adirondack style. Still, I'd almost rather see something that does not mimic local history (aka Knott's Berry Farm) but rather gently sets itself apart from the original buildings, but is still done in an architecturally- and setting-sensitive way.

Finally, having some familiarity with NEPA and the Forest Service, I understand the appeal of a Cat Ex over an EA. But I am still surprised that the Flathead NF officials could not see the freight train coming in response to this particular proposal (to repeat: it IS a major development) and still try to evaluate it fairly under a Cat Ex.

Indeed, while the increase in visitation numbers remain ominously obscure, the proposed level of development will definitely have a major effect on the human environment at Holland Lake. Moreover, there ARE cultural resource impacts and definite affects on surrounding FS campgrounds, trails, boating and other public uses. More people, year-around use etc., may cause more effects on fisheries, wildlife, and other resources.

Whatever rationale the Forest Service now gives for using a Cat Ex, the public perception is that the agency is fast-tracking this proposal at the behest of corporate interests, and is thus foregoing the more detailed analyses of an EA.

Regardless of the NEPA tool is used, I strongly encourage Flathead NF officials to slow down and really think this proposal through. In my view, the character of the Seeley Lake area and Holland Lake will change significantly with this level of development, with more development likely to follow given POWDR's mission and portfolio.

Thank you,  
Carl Davis