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First name: Meredith

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Organization: National Forest Homeowners

Title: President

Comments: Dear Supervisor Steele,

National Forest Homeowners (NFH) appreciates the opportunity to comment on the proposed expansion project at Holland Lake Lodge. NFH represents approximately 13,800 cabin owners across the country operating under USDA Forest Service Recreation Residence permits. There are currently 17 recreation residence users on Holland Lake, most of whom have expressed grave concerns regarding this project.

After reviewing the proposed expansion of the Holland Lake Lodge resort, we also have several concerns regarding the proposed project:

First, no notification of any kind was ever provided to the 17 cabin permittees on Holland Lake. The proposal seemed rushed without any kind of real public input or comment. We understand a hasty meeting was called on September 8th and held outdoors in a field at the Lodge, where the 100 or so attendees had to stand because there were no chairs. There was no presentation. The opportunity to comment was to be closed in 17 days. After considerable outcry, a formal meeting has been scheduled and the comment period extended. Also, by amending the Holland Lake Lodge term special use permit on August 22, 2022 authorizing the drilling of two new water wells to support the Holland Lake Lodge expansion prior to any formal approved of the project, the action suggests the Forest Service does not intend to take the public's comments into serious consideration and has already provided a de facto approval of the project.

Second, there appear to be inconsistencies regarding the size of the land authorized by the term special use permit. The existing special use permit specifies a total of 10.53 acres of national forest land authorized for use by the permit, however the proposed Master Development Plan states an intent to expand the facilities to 15 acres. The 15-acre site is also referenced in the Forest Service project overview. If the Forest Service intends to allocate more national forest land to the permit holder, we believe the Forest Service should properly disclose that decision, which also supports a higher level of environmental review for this project.

Third, we are concerned the Forest Service intends to categorically exclude this project from an environmental impact review. As the national advocacy organization for recreation residence permit holders, we have considerable experience with Forest Service environmental review practices. In general, we agree with the use of Category Exclusions for most improvement projects by special use permit holders. However, as we understand it, current Forest Service policy does not make carte blanche use of Category Exclusions for all special use improvement projects. We assert that the size and scope of this project goes well beyond the intended use of a Category Exclusion. The master development plan would increase the total square feet of structures under permit by 3-4 times in order to accommodate triple the visitor capacity of the resort. Also, we understand the existing buildings have been determined to have historic significance under section 106 of the National Historic Preservation Act. The master development plan calls for the removal of several of these historic structures, which also supports the need for additional review. Furthermore, the master development plan calls for the Forest Service to turn over their ownership and operation of the existing offsite wastewater facility to the Lodge owners, which requires the issuance of a separate special use permit. While the Forest Service environmental review policy allows for certain improvement projects under a special use permit to use a Category Exclusion, it does not require it. By policy, the use of a Category Exclusion is intended for "actions that normally do not have significant effects on the human environment." and "...generally do not have significant environmental effects". We contend that the size and scope of this project potentially has significant environmental effects and extraordinary circumstances do exist, therefore the project should be reviewed under the agency's Environmental Assessment process. We believe the Forest Supervisor has the authority and obligation to conduct an environmental review

appropriate for the size and scope of the project.

While expressing our concerns above, we also wish to state we are not necessarily opposed to upgrading the Holland Lake Lodge facilities, including a reasonable level of expansion. We support and welcome opportunities for more recreation on national forest lands. We believe the Forest Service has an obligation to carefully determine the size and scope of a resort that can be supported by the surrounding environment, while taking into consideration the relatively small size of the lake and other recreation facilities on or near the lake. As expressed to us by the Holland Lake cabin owners, the size and scope of the proposed facilities could "overwhelm" the lake community and use of surrounding national forest lands.

Sincerely,

Meredith Randall  
President  
National Forest Homeowners