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March 28, 2005

Mr. Sean Conrad
Lake County Planning Department
104 Fourth Avenue East
Polson, MT 59860

Re: Kootenai Application

Dear Mr. Conrad:

I have again reviewed the February 2, 2005 letter from Mr. Pete Brown of the Montana State Historic Preservation Office, together with his e-mail of March 2, 2005, and a later letter from the Mountains/Plains Office of the National Trust for Historic Preservation. Our responses are as follows:

At the outset it is important to understand that the application for preliminary plat approval is grounded in a genuine desire by Paul Milhous to save the Lodge from incipient destruction. It is also important to keep in mind that the designation of the Lodge as a historic district in the early 1980's coincided with an effort to redevelop the Kootenai Lodge pursuant to an approval granted by Lake County for the construction of the first phase. As you know, that effort was not successful, and the property has been in decline ever since. As you know, one of the more important cabins has in fact declined to the point that it is no longer feasible to revitalize the building. Left in their current condition, it is likely that the decline of the buildings will accelerate and that the most important elements of the Kootenai Lodge Historic District will be lost forever.

It is also important to understand that the development program has been developed on the basis of what it will take to ensure the restoration and rehabilitation of the most buildings in the Kootenai Lodge Historic District - nothing more, nothing less. We appreciate that it would be desirable to simply rehabilitate the existing buildings. Unfortunately the concept is not economically feasible - a circumstance confirmed by the last twenty plus years of effort by two different property owners.

With regard to the specific comments in Mr. Brown's February 2, 2005, letter, the draft Covenants and Restrictions make provision for his concerns with regard to the rehabilitation of the existing historic structures and for all new construction in a fashion which we believe is consistent with the Secretary of the Interior's standards.

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With regard to Ms. Pahl's letter from the Denver office of the National Trust, we think it important to recognize that the values described – "historic and architectural character of the historic lodge, cabins and landscape" – are not abstractions or generalities. For example, the open spaces and vistas which contribute to the historic significance of the Kootenai – the views to and from Swan Lake are carefully preserved in the proposed preliminary plat. The proposed new structures reflect the character, materials and spatial distribution of the structures which make up the "historic" Kootenai Lodge. Our view is that the proposed plan strikes an appropriate balance between the desires to preserve the Kootenai as is, which is economically feasible, and the realities of preservation. We agree that the Kirkland Cutter's contribution to the lodge, cabins, and landscape are the core elements of the Kootenai Lodge and that is why the "camp" area and its "landscape" are maintained in the plan while new structures are placed in a rhythm and spatial distribution which is consistent with the camp or are located in areas which are not a part of the Kootenai Lodge, *e.g.* north of Johnson Creek or away from the Lake.

We also well understand the advantages of the federal tax credit for qualifying historic rehabilitation; however, the only economically viable uses for the rehabilitated structures, are limited in their potential for tax credits. In the final analysis, the preservation of the historic buildings of significance consistent with the goals and standards of the Department of Interior is the central theme of the proposal, not eligibility for tax credits. *We genuinely believe the rehabilitation and preservation of the Kootenai Lodge building, the cabin, and the tailored landscape around these historic buildings is what is really important to the residents of the Swan Lake and Lake County as a whole.*

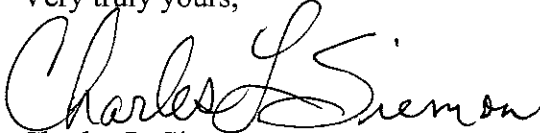
Finally, we do not agree that the proposed development will "significantly diminish the historic character of the lodge, cabins, and landscape of the "Kootenai Lodge." Indeed, without intervention, we believe that the Lodge and cabins are currently at risk and that any further decline will not only diminish their character but also lead to their ultimate loss. As for the balance of the site, we are confident that the character of the new structures will not detract from the "historic character" and "open space and vistas" which have defined the Kootenai for more than 80 years. Put plainly, the open space and vistas of significance are not from Sunburst Drive. Nor do they include the open, rough-mowed field north of Johnson Creek and are screened from the Kootenai proper by the heavy forest along the creek, which has variously been used as a polo field (long gone) and crude driving range. While the barn is interesting and proposed to be rehabilitated, it reflects none of the attributes championed by either Mr. Brown or Ms. Pahl, and has no functional relationship to the Lodge and cabins other than common ownership.

In the final analysis, the rehabilitation and preservation of privately owned historic resources involves creating balance between public and private interests and expectations. The National Register of Historic Places has proven a wonderful tool for the rehabilitation of structures and places of historic significance; however, in some instances the tax credits are not enough to make rehabilitation feasible. We believe that the Kootenai Lodge is one of those circumstances, as has been proven by the unsuccessful efforts of two different owners over the

last 20 years. The Milhous proposal will save the Kootenai Lodge and restore the buildings and the landscape context – campground style under giant over story trees – in a manner which preserves the remarkable character of the Kootenai Lodge as seen from or across Swan Lake, a vista of great historic and scenic value. We agree with Mr. Brown that “setting and feeling” are important qualities and that is why Mr. Milhous has stepped forward. His home is a part of that setting and feeling, and he believes that the rehabilitation and preservation of the log structures which make up the “camp” which he can see from his house must be protected. He believes the only way that is economically feasible is to rehabilitate the historic structures as upscale residences for seasonal owners who will, by their very ownership, ensure the long term stewardship of the rehabilitated structures, and to spread the cost of rehabilitation over a discrete number of additional units designed and located to respect and reinforce the significance of the Kootenai Lodge, cabins and grounds.

We hope that you will find our comments useful with regard the application for preliminary plat approval.

Very truly yours,


Charles L. Siemon