

**The Colorado Arlberg Club**  
1930 Mary Jane Road  
Winter Park, CO 80482

December 18, 2023

**SUBMITTED ELECTRONICALLY**

Eric Freels  
Sulphur Ranger District of  
the Arapaho and Roosevelt National Forests  
and Pawnee Grasslands  
9 Ten Mile Drive  
P.O. Box 10  
Granby, CO 80446  
[eric.k.freels@usda.gov](mailto:eric.k.freels@usda.gov)

Re: Willow Creek Land Exchange –Draft Environmental Assessment (the “**Draft EA**”)

Dear Mr. Freels:

The Colorado Arlberg Club, a Colorado nonprofit corporation (“**CAC**”), is the owner of property in close proximity to the property identified as the “Federal parcel” in the above-referenced Draft EA.

CAC has entered into a letter agreement dated June 15, 2015 (the “**Letter Agreement**”) with TMII Development, LLC (“**TMII**”), Intrawest/Winter Park Operations Corporation (“**IWPOC**”), and Winter Park Recreational Association (“**WPRA**”). TMII is the “Non-Federal Party” described in the Draft EA. The Letter Agreement outlines terms for the use of the proposed Federal parcel which provide conditions among CAC, IWPOC, WPRA, and TMII. We understand that the USFS cannot enforce the terms of the Letter Agreement.

CAC supports the “Proposed Action” (as defined in the Draft EA) as long as the conditions outlined in the Letter Agreement are followed and an easement / right-of way wide enough for the current traveled width of the Mary Jane Road and snow storage along the outside boundary of the road is provided.

In particular, the second paragraph of Section 2.2.1.2 of the Draft EA refers to a “final definitive agreement”, which is contemplated by the Letter Agreement. At this time, no final definitive agreement has been reached.

One critical aspect of the Letter Agreement is that CAC continue to have access over the Mary Jane Road. The Right-of-Way Reservation of the Mary Jane Road identified in Appendix A of the Draft EA is acceptable to the extent such reservation leaves the current public access (or its substantive equivalent) in place.

Thank you for the opportunity to comment on the Draft EA.

Sincerely,

The Colorado Arlberg Club

By /s/ Linda Clark  
Linda Clark  
President