



**WESTERN
LAND
GROUP, INC.**

PO Box 16849 • Golden Colorado 80402 • (303) 715-3570 • www.westernlandgroup.com

December 18, 2023

Mr. Eric Freels, District Ranger
USFS Sulphur Ranger District
P.O. Box 10
Granby, CO 80446

RE: Willow Creek Land Exchange Draft Environmental Assessment

Dear Mr. Freels,

Western Land Group, Inc. is providing these comments on the Draft Environmental Assessment on behalf of TMII Development, LLC, the exchange proponent/Non-Federal Party for the Willow Creek Land Exchange.

Overall, the draft Environmental Assessment accurately analyzes and describes the affected environment and environmental consequences of the proposed Willow Creek Land Exchange. However, the draft EA falls short on one issue: existing trails and dispersed recreation uses on the Federal Parcel.

There is one single-track summer trail on the Federal Parcel, commonly referred to as the Jackalope Trail, that originates off Mary Jane Road directly across from the southern entrance to the Dotsero parking lot. The Jackalope Trail continues northerly on the Federal Parcel between Mary Jane Creek and Mary Jane Road, then turns easterly paralleling the switchback on Mary Jane Road. Once east of the Federal Parcel, the trail goes southerly and parallel to Mary Jane Road. The Jackalope Trail ends in the Rollins Pass parking lot.

Only a very short segment of the Jackalope Trail, located just north of the Mary Jane Road switchback, is located in the northern half of the Federal Parcel. The Jackalope Trail does not provide a connection from the Mary Jane base area to the Iron Horse, Base Camp 9200, and CHILL condominiums. See attached figure from the 2016 Winter Park Phase 2 Downhill Trail Expansion and Improvement Environmental Assessment.

Specific sections of the draft EA with issues that need to be addressed in regard to the Jackalope Trail are listed in the table below.

Page/Section	Issue	Comment
p.43; Table 10, last row	The location of Jackalope Trail on the Federal Parcel is not accurately described. The trail runs northerly from the Mary Jane Base area through the southern	Revise the Action Description to reflect the following about the Jackalope Trail: it is not on the northern portion of the Federal Parcel; it does not connect to condo and housing developments; and portions of the

Page/Section	Issue	Comment
	portion of the parcel, then heads to the east above the switchback in Mary Jane Road.	Jackalope Trail on the Federal Parcel will likely <u>not</u> be available for use by existing residents or new residents as it is primarily on the portion of the parcel within the proposed development envelope.
p.70; Sec 3.8.2.1	Second to last sentence on page does not accurately describe the location of the Jackalope Trail.	Modify sentence to read the Jackalope Trails traverses the southern portion of the Federal Parcel.
p.78, Sec 3.10.2.1	<p>Paragraph does not accurately describe:</p> <ol style="list-style-type: none"> 1. the level of recreational opportunities on the parcel; 2. the property to the west of the Federal Parcel; 3. the location of Jackalope Trail on the Federal Parcel, and existing recreational opportunities on the Federal Parcel. 	<p>Revise the first sentence to state, “Recreational opportunities on the Federal Parcel are limited due to its steep topography on its north half and its location.</p> <p>Revise the second sentence to state, “on the west, the parcel is bounded by the Bridger’s Cache residential subdivision.</p> <p>Revise the fifth sentence to delete “and a more formal trail, the Jackalope Trail, that runs through the northern portion of the parcel.”</p> <p>Delete last sentence. (The residents and guests to the condo developments west of the Federal Parcel utilize trails in the summer that connect with the “ski-way” between the Winter Park and Mary Jane bases, not trails on the Federal Parcel.)</p>

Other minor issues in the draft EA that need to be addressed in the final EA are listed in the table below.

Page/Section	Issue	Comment
p.37; Sec 2.2.3.1, third bullet	The action stated relates to the Non-Federal Parcel.	This bullet should be moved to Section 2.2.3.2.
p.37; Sec 2.2.3.1, last bullet	The bullet does not describe the Forest Service amending the special use permits after the easements are granted.	<p>Add a new sentence after the first sentence that states, “The Forest Service would secure an amendment to each Special Use Permit to remove the segment being converted to an easement.”</p> <p>Amend the last sentence so it states, “The proposed easements and special use permit amendments are described in Appendix B.”</p>
p.59; Table 15, FSS abbreviation below table	FSS is not used in the table and not needed.	Remove “FSS=Forest Service Sensitive” below the table.
p.65; Sec 3.5.3.2 Agency Mitigations	The remediation of the solid waste dump site on the Non-Federal Parcel that is described was completed by contractors hired by the Non-Federal Party on	The final EA should reflect the remediation of the dump site has been completed per Forest Service direction and guidelines. No additional work is required.

Page/Section	Issue	Comment
	November 8, 2023. The work followed the removal plan approved by the Forest Service, with Forest Service employees overseeing the on-the-ground work.	
p.67; Sec 3.6.3.2, Non-Federal Parcel	Clean-up efforts for the solid waste dump, including removal of the Ford Fairlane automobile were completed on November 8, 2023 following the Forest Service-approved removal plan.	Delete all but the first sentence under the Non-Federal Parcel sub-heading.
p.67; Sec 3.6.3.2, Non-Federal Parcel	Clean-up efforts for the solid waste dump were completed in November 2023.	Delete all but the first sentence under the Non-Federal Parcel sub-heading.
p.67; Sec 3.6.3.2, Agency Mitigations	Cleanup efforts were completed in November 2023.	Remove this subsection in Final EA.
p.71; Sec 3.8.2.1	First sentence on top of page is erroneous and confusing as there are private lands, not NFS lands, to the west of the Federal Parcel. NFS lands east of the Federal Parcel include Mary Jane Road and a municipal water tank.	Remove sentence.

Thank you for your consideration of these comments.



Todd Robertson, Principal
Western Land Group, Inc.

Attachment: Figure with Jackalope Trail location