

Data Submitted (UTC 11): 7/28/2025 6:00:00 AM

First name: Jordan

Last name: Cohen

Organization: Winter Park Resort

Title:

Comments: The comments of Winter Park Resort are in the attached pdf.

Submitted Electronically

USDA Forest Service

Rocky Mountain Region

Attn: Reviewing Officer

C/O Director of Strategic Planning

1617 Cole Blvd., Bldg. 17

Lakewood, CO, 80401

Re: Winter Park Resort's Objection to the Winter Park Resort Projects 2025 Draft Decision Notice

Dear Reviewing Officer:

Winter Park Resort ("WPR") respectfully submits this objection to the June 2025 Draft

Decision Notice, Environmental Assessment, and Finding of No Significant Impact for the Winter Park Resort Projects 2025 (the "Project"). WPR appreciates the Forest Service's extensive level of work, public outreach, and coordination in preparing the Draft Decision Notice and Environmental Assessment. WPR submits this objection to preserve its right to participate in any objection resolution meetings that may occur and to request that the Forest Service clarify the points identified below in the Final Decision Notice.

I. WPR Supports the Adoption of the Proposed Action

WPR operates a four-season ski resort on National Forest System lands within the

Arapaho and Roosevelt National Forests under a long-term special use authorization. The Project area has been a developed ski area for over 80 years. WPR and the Forest Service have a longstanding partnership and have worked together to provide high-quality public recreation on the public lands within WPR's special use permit boundary.

WPR participated in each stage of the Project planning process and submitted comments on the Draft Environmental Assessment. See Exhibit 1 (April 25, 2025, Comments by WPR on Draft Environmental Assessment). WPR appreciates the Forest Service's consideration of its comments on the Draft Environmental Assessment and the Forest Service's clarifications and revisions in response to WPR's comments. See WPR Projects 2025 Draft EA Consideration of Comments (WPR006-25-002D0).

WPR submits this objection as the holder of a long-term authorization for the development and operation of ski area recreation facilities and the Project proponent. WPR supports the Proposed Action. WPR submits this objection to preserve its right to participate in any objection resolution meetings that may occur and respectfully requests that the Forest Service notify WPR of the opportunity to participate in any objection resolution meetings.

The Project is necessary to optimize the operational efficiency of existing mountain infrastructure and to improve and enhance the guest experience at the Resort. Each underlying component of the Project is necessary to accomplish the Project goals and to continue to provide high quality public recreation within WPR's special use permit boundary.

II. Compliance with 36 C.F.R. Part 218

WPR timely submits this objection letter within 45 calendar days of the June 13, 2025 publication of the legal notice in the Coloradoan. WPR has standing to submit this objection pursuant to 36 C.F.R. [sect] 218.5(a). WPR submitted written comments on the Draft Environmental Assessment. See Exhibit 1. WPR provides the following information pursuant to 36 C.F.R. [sect] 218.8:

Objector's Name and Address (36 C.F.R. [sect] 218.8(d)(1)):

Doug Laraby

Planning Director Winter Park Resort 85 Parsenn Rd.

Winter Park, CO 80482

970-726-1509

DLaraby@winterparkresort.com

Name of Proposed Project, responsible official, and location (36 C.F.R. [sect] 218.8(d)(4)):

Name of Proposed Project: Winter Park Resort Projects 2025

Responsible Official: Chris Stubbs, Forest Supervisor

Location: Arapaho and Roosevelt National Forests & Pawnee National Grassland

Consistent with the requirements under 36 C.F.R. [sect] 218.8(d)(6), the issues raised in this objection are based on WPR's prior written comments on the Draft Environmental Assessment, see Exhibit 1, or issues arising after the public comment period.

III. WPR's Remaining Comment and Objection

WPR supports the Forst Service's approval of the Project. WPR has one remaining comment and objection on the Draft Environmental Assessment.

A. The Forest Service should clarify that the conditions of approval in Appendix A aimed at protecting migratory birds and bat species may be satisfied by pre-construction surveying. WPR requests that the Forest Service

allow a pre-activity survey as an alternative to the timing stipulations aimed at protecting migratory birds and bats in the Project area. Final EA, at Appx. A-7. Presently, the conditions of approval require WPR to avoid construction activities between May 15th and July 31st for bats and March 1st to September 30th for nesting bird species. Final EA, at Appx. A-7. These timing stipulations have the potential to unnecessarily constrain WPR's ability to construct improvements in the Project area during the seasonal construction window. WPR requests the Forest Service modify these stipulations to allow surveying as an alternative means of complying with these stipulations. A survey that shows that migratory birds and bats are not present in the construction area would provide the same level of protection for the species as a timing stipulation while affording WPR necessary flexibility to complete Project construction during an already limited summer construction window. WPR appreciates the Forest Service's careful consideration and collaboration in preparing the Project environmental analyses. The Project is critical to providing world class public recreation on the public lands within WPR's special use permit boundary. WPR understands that the Forest Service may choose to hold objection resolution meetings pursuant to 36 C.F.R. [sect] 218.11 and respectfully requests notice of and the opportunity to participate in any such meetings, including meetings held with other objectors.