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First name: B. Travis
Last name: Wright
Organization: Grand County Historical Association
Title: President of the Board of Directors
Comments: The direction and decision to send this letter were made unanimously by the GCHA Board of Directors. While I serve as Board President and am the one conveying it, the content reflects the Board's collective position, not a personal one.

Please see attachment.

The direction and decision to send this letter were made unanimously by the GCHA Board of Directors. While I serve as Board President and am the one conveying it, content reflects the Board[rsquo]s collective position, not a personal one.

The GCHA deeply values its longstanding relationship with the U.S. Forest Service and appreciates the consistent professionalism, transparency, and good-faith engagement extended to consulting parties throughout this process. We also acknowledge Winter Park Resort[rsquo]s participation in the consultation and recognize the complexities of undertaking such projects in historically significant settings. We wish to make clear that our objection is not intended to frustrate the project, create unnecessary conflict, or foreclose opportunities for future collaboration with either the agency or the Resort. On the contrary, we hope our participation supports a shared commitment to stewardship, ensuring that preservation concerns are given full and fair consideration alongside development goals.

While the Forest Service has facilitated dialogue and provided opportunities for input, we remain concerned that the current terms of the proposed Memorandum of Agreement do not fully resolve the adverse effects identified during consultation. We recognize that reasonable people can differ in how best to address complex historic resource issues, and if our understanding of the undertaking or its implications is incomplete, we genuinely welcome clarification. Our intent is not to draw lines, but to remain engaged in a process that we believe when working at its best, allows diverse perspectives to strengthen the outcome. With that spirit in mind, and in keeping with our role as a consulting party under the National Historic Preservation Act, we are submitting this objection to help ensure that the final resolution reflects both the procedural completeness and substantive care the law envisions.

We also wish to note that the timing of the Environmental Assessment process limited the opportunity to fully explore potential refinements or amendments to the Memorandum of Agreement before the deadline to file a formal objection to the proposed Finding of No Significant Impact. While our preference was to continue working toward consensus outside of formalities, the statutory deadline necessitated submission in order to preserve our standing under 36 CFR [sect]218.5(a). This should not be interpreted as a breakdown in collaboration, but rather as a necessary step to preserve standing while maintaining an open hand toward resolution. We remain committed to continued dialogue and would welcome additional time to ensure that the final process meaningfully addresses the adverse effects identified through consultation.

Summary of Objection
Pursuant to 36 CFR [sect]218 and 40 CFR [sect]1503.3, the Board of Directors of Grand County Historical Association (GCHA) unanimously and formally objects to the proposed Finding of No Significant Impact (FONSI)

for the Winter Park Resort Projects 2025 EA #66200, specifically related to the Looking Glass Lift.

The GCHA Board feels the FONSI is premature and procedurally unsupported, as it relies on a Memorandum of Agreement (MOA) that the GCHA board views as substantively deficient and procedurally incomplete under Section 106, due to a pending formal objection under 36 CFR [sect]800.2(b)(2). (Note: While GCHA initially referenced [sect]800.6(b)(1)(v), upon further review we recognize that [sect]800.2(b)(2) more accurately reflects the applicable framework. Nonetheless, the opportunity for consulting parties to raise and preserve objections remains fully supported within the structure of the Section 106 process.)

Because the objection was submitted after the Draft FONSI was published, its absence from the record reflects timing rather than oversight. However, we feel the objection[rsquo]s existence renders the Section 106 process incomplete for NEPA purposes.

GCHA submits this objection pursuant to 36 CFR [sect]218.5(a), having previously submitted timely, specific written comments on the Draft Environmental Assessment. As a consulting party with a documented role in both Section 106 and NEPA consultation, and as a local preservation stakeholder with direct interest in the affected resource, we meet the criteria for standing under Subparts A and B.

Founded in 1974, the Grand County Historical Association (GCHA) is a nonprofit steward of the region[rsquo]s layered history. We operate multiple museums, conduct historical research and education, and routinely collaborate with local, state, tribal, and federal preservation partners. We advocate not against progress, but for process: faithfully applied and historically informed. GCHA stands ready to assist in developing an agreement that reflects the public interest, honors historic integrity, and withstands regulatory scrutiny.

Grounds for Objection
1. The Proposed FONSI Relies on a Contested and Substantively Insufficient MOA
The Looking Glass Lift has been determined eligible for listing in the National Register of Historic Places as a complete and intact Riblet system, a historically significant linear resource with architectural integrity. Its removal constitutes an acknowledged adverse effect under Section 106.

The Forest Service, as the authorizing federal agency, executed a MOA with SHPO and the applicant, Winter Park Resort. GCHA was invited to sign as a concurring party and declined, citing substantive deficiencies in the mitigation plan. While our signature was not required under 36 CFR [sect]800.6(c)(1), it is equally true that:

* GCHA submitted a formal objection under the 106 process;
* GCHA[rsquo]s formal objection remains under review, and to our knowledge, the Advisory Council on Historic Preservation (ACHP) has not yet had the opportunity to provide input. Notably, the Draft FONSI was released prior to the full execution of the Memorandum of Agreement, which was signed by Winter Park Resort on July 23, 2025[mdash]five days after our formal objection was submitted on July 18. While GCHA is not a required signatory under 36 CFR [sect]800.6(c)(1), we submitted a timely formal objection consistent with the process outlined in 36 CFR [sect]800.2(b)(2). Although our initial filing cited [sect]800.6(b)(1)(v), we acknowledge upon further review that [sect]800.2(b)(2) is the more accurate regulatory basis for objections from consulting parties that decline to sign a Memorandum of Agreement. That early citation error does not affect the validity of the objection itself, which remains procedurally sound and well within the scope envisioned by the Section 106 regulations. From our perspective, this sequence indicates that consultation had not yet concluded at the time our objection was raised, and therefore, the Section 106 process remained procedurally open. We recognize that the intersection of timing, consultation, and formal decision-making can present real challenges in fast-moving projects. Still, when questions remain open and mitigation measures are subject to ongoing review, finalizing a Finding of No Significant Impact may unintentionally reduce confidence in the process. We offer this reflection in

the spirit of collaborative accountability: not as a barrier to progress, but as a contribution toward a decision-making process that is as strong, transparent, and trusted as the community deserves.

The threshold here is not whether the MOA was procedurally executable, it was. The threshold is whether the adverse effect was substantively resolved in a manner that justifies a FONSI under NEPA.

The board finds the MOA does not meet that standard:

* Key components of the lift were promised to third parties before the Section 106 process concluded, in direct conflict with 36 CFR [sect]800.3(c)(3), which prohibits actions that preclude consideration of alternatives;
* An overwhelming number of the removed components (chairs) are not being retained for interpretive or preservation purposes, except for one. The MOA is silent on the fate of the remaining chairs, despite their historic significance and the system-wide eligibility of the lift as a whole. This silence is especially notable given that the lift[rsquo]s eligibility under the National Register was based on its integrity as a complete system, not on any single component. Publicfacing commitments about chair preservation were made before consultation concluded, yet the MOA contains no stipulations ensuring those components are retained, documented, or used for interpretive purposes. In practice, chairs have been promised or transferred for general-purpose charitable auctions unconnected to historic preservation, education, or documentation. That omission has material consequences. It undermines interpretive continuity and places the fate of the resource outside enforceable public process. It severs any interpretive continuity and leaves the final disposition of the lift to private discretion, outside the scope of enforceable mitigation.
* The MOA includes mitigation roles for GCHA, despite our status as a non-signatory and formal objector, rendering those provisions structurally insecure and unenforceable at this time.

Mitigation must be proportionate to the scale and permanence of the effect. Here, the impact is the complete and irreversible removal of a nationally eligible historic system. The MOA offers signage, a privately licensed oral history video, and the overwhelming amount of equipment donations to a non-historic preservation entity with no enforceable standards.

Under 40 CFR [sect]1508.1(y), NEPA defines a [ldquo]significant[rdquo] impact based on context and intensity:

* Context: The removal of a culturally resonant, historically intact lift system from a public landscape under federal jurisdiction;
* Intensity: Total and permanent removal, with mitigation that is partial and speculative.

A procedurally executed MOA is not equivalent to a resolved adverse effect. Until GCHA[rsquo]s objection under 36 CFR [sect]800.2(b)(2) is addressed, and until the Forest Service demonstrates that mitigation meaningfully offsets the loss, a FONSI cannot lawfully proceed.

The agency may assert that consultation is complete. But procedural execution under [sect]800.6(c)(1) does not erase the legal effect of an unresolved formal objection under [sect]800.2(b)(2). Nor does it satisfy NEPA[rsquo]s threshold for significance. The CEQ and ACHP[rsquo]s NEPA and NHPA Handbook (2013) states clearly: [ldquo]An adverse effect finding under Section 106 should be considered in determining the significance of effects under NEPA.[rdquo]

We understand that the Forest Service may view its consultation efforts as consistent with the requirements of Section 106 and that the undertaking[rsquo]s location on private property introduces unique considerations. At the same time, we respectfully offer that public confidence in these decisions depends not just on whether process boxes are checked, but on whether adverse effects are substantively addressed in a way that reflects the values the process is designed to uphold. When effects remain unresolved or mitigation feels partial or

unclear, the legitimacy of the outcome, both procedurally and in the eyes of the public, can be placed in doubt. We raise this not as a legal argument, but as a reflection of how public processes earn and sustain trust: through transparency, completeness, and a shared commitment to seeing concerns through to resolution.

While we recognize that private property status can complicate federal involvement, the Section 106 regulations at 36 CFR [sect]800.2(a) clarify that a federal agency[rsquo]s responsibilities remain in force when an undertaking includes federal permits, approvals, or oversight. In this context, we believe that a request for the Advisory Council on Historic Preservation to join the consultation pursuant to [sect]800.6(b)(2) is both appropriate and constructive, as it may allow all parties to benefit from neutral expertise and resolve remaining concerns before the decision is finalized. Their participation would provide helpful guidance to ensure that the resolution of adverse effects is both procedurally complete and consistent with the intent of the Section 106 process.

We believe at this time the MOA[rsquo]s mitigation measures are substantively limited and may not yet fully reflect the magnitude of the impact. We respectfully suggest that either revising the MOA or postponing the FONSI would more fully align with the law[rsquo]s intent and strengthen public confidence in the decision. GCHA is not asking the agency to stop the project. The board respectfully feels that the agency has not met the threshold for issuing a Finding of No Significant Impact.

2. The Agency Precluded Reasonable Alternatives by Permitting Predecisional Actions
The components of the lift were promised to third parties not named in the MOA before Section 106 consultation concluded. This undermined both GCHA[rsquo]s and the public[rsquo]s ability to propose feasible alternatives involving coordinated interpretation.

Under 36 CFR [sect]800.3(c)(3), agencies must [ldquo]refrain from taking any action that would preclude the consideration of alternatives to avoid or minimize adverse effects.[rdquo] While the lift was privately owned by the Resort, the project constitutes a federal undertaking under 36 CFR [sect]800.16(y) due to its location on public land and the need for federal authorization. That federal status brings with it a public responsibility. When applicants make early commitments, even informally, it can limit the space for meaningful consultation; placing the Forest Service in a position where its obligation to preserve alternatives becomes harder to uphold.

Private ownership does not insulate a project from public consequence. Once federal approval is required, the effects including adverse effects to historic properties, become public by definition. The Advisory Council's regulations make this explicit: [ldquo]The views of the public are essential to informed Federal decisionmaking in the Section 106 process[rdquo] (36 CFR [sect]800.2(d)). The adverse effect here: the complete removal of a nationally eligible lift system is not a private action. It is a public loss. The mitigation measures outlined in the MOA do not reflect the scale of that loss.

3. The Public Participation Process Did Not Meet NEPA or Section 106 Standards
Although NEPA requires agencies to solicit and incorporate public views on environmental and cultural impacts (40 CFR [sect]1506.6), the Looking Glass project[rsquo]s NEPA and Section 106 consultations were conducted in a manner that treated input as procedural formality rather than substantive contribution.

* The MOA was shared with consulting parties in what appeared to be a near-final form, which limited opportunities for participants to help shape or refine its terms. Many of GCHA[rsquo]s recommendations, while offered in good faith, were not incorporated, raising concern that consultation did not fully reflect the range of perspectives shared.
* Although NEPA comment windows were provided, the public had little opportunity to shape or meaningfully influence alternatives to demolition or to offer input on whether the proposed mitigation reflected the lift[rsquo]s historic value. By the time public input was invited, key decisions, such as the disposition of lift components, had already been made or informally committed, reducing the practical space for public concerns to inform outcomes.

The Advisory Council on Historic Preservation[rsquo]s Section 106 Agreement Checklist reinforces the inadequacy of this process. It explicitly asks: [ldquo]Are procedures for public involvement included for any ongoing reviews carried out according to the agreement[rsquo]s terms?[rdquo] (36 CFR [sect]800.2(d); [sect]800.6(a)(4)). The ACHP[rsquo]s Section 106 Agreement Checklist further expects agencies to document how public views have been considered, and to ensure that mitigation measures yield identifiable public benefit.

The Forest Service may argue that the checklist is advisory. That is true, but it was developed by the federal agency charged with administering Section 106, and it reflects nationally accepted adequacy standards. Where an agency departs from those expectations, particularly in areas as central as public involvement and mitigation integrity, it bears the burden of explanation. No such rationale appears in the record.

In sum, the public[rsquo]s statutory right to informed and meaningful participation was not upheld. Procedural compliance was not matched by substantive engagement, and key decisions were insulated from public input even as formal comment windows remained open.

4. The Nature of the Harm Is Irreversible and Unmitigated
The Looking Glass Lift is not merely a collection of parts; it is a coherent, spatially legible system that reflects a pivotal period in Colorado[rsquo]s ski area development. Its integrity lies not in isolated components, but in the relationship between alignment, towers, terminals, and function. That context is what made it eligible for the National Register.

Preserving a single chair while dismantling the entire system does not constitute meaningful mitigation. It fragments the resource, severs interpretive continuity, and reduces a once-integrated historic property to memorabilia. The loss of spatial and operational coherence is total and irreversible.

The MOA has not yet demonstrated alignment with the standard of [ldquo]avoidance, minimization, or mitigation[rdquo] required under 36 CFR [sect]800.6(a). The board feels current mitigation does not address the magnitude of permanent loss to the public[rsquo]s understanding of ski lift development and alpine engineering in the postwar era.

5. GCHA Declined to Concur with the MOA Due to Substantive Objections
GCHA was invited to be a concurring party to the MOA. However, we did not sign the MOA because we object to the final mitigation terms and the process by which they were developed.

Although we participated as a consulting party in good faith, the final agreement was presented largely as a finished product. It did not meaningfully incorporate GCHA[rsquo]s recommendations, nor did it seem to reflect the scale or nature of the adverse effect. The final MOA, for example, retains only a single chair from a system deemed eligible for the National Register[mdash]a mitigation strategy the GCHA board unanimously flagged as insufficient.

Under 36 CFR [sect]800.6(c)(3), the agency is obligated to consider objections raised by consulting parties who decline to sign. Our refusal to concur was not a symbolic act: it was a clear and timely signal that the agreement fails to meet the minimum threshold of mitigation necessary for a valid FONSI. That objection is now part of the administrative record and must be evaluated accordingly.

6. Section 106 Remains Procedurally Unresolved
Although GCHA[rsquo]s signature is not required to execute the MOA, the agency is still obligated to respond meaningfully to our formal objection and cannot claim the MOA resolves adverse effects for NEPA purposes while that objection remains unresolved and under Advisory Council review. As of the date of this objection, the Section 106 process remains procedurally unresolved.

GCHA has submitted a formal objection requesting that the Advisory Council on Historic Preservation (ACHP) review the terms of the MOA due to deficiencies in mitigation and consultation. Due to tight timelines, the Forest Service has not had a chance to disclose in the record that an ACHP review request is pending; as of this filing, the ACHP has not issued an opinion, and the objection remains pending under federal regulation. Because this request for review was submitted after the Draft FONSI was published, its absence from the current record reflects timing rather than oversight. However, moving forward without acknowledging the pending objection creates a procedural gap that undermines the completeness of the NEPA record. The GCHA[rsquo]s objection was raised after the draft FONSI was published as the mitigation was deemed insufficient after several consultation meetings.

Proceeding with a final decision under NEPA while adverse effects to historic properties remain actively contested and while resolution is delayed pending external review undermines the integrity of both NEPA and NHPA compliance. Because the agency[rsquo]s resolution of adverse effects is contested, and formal objection remains under review, we feel the Forest Service cannot rely on the MOA as the basis for a Finding of No Significant Impact under 40 CFR [sect]1508.1(y). A FONSI requires that impacts, including those to historic properties, be demonstrably resolved or adequately mitigated. We feel that standard has not been met.

Additional NEPA-Based Objections to the Broader Project
We raise these points not in opposition, but in stewardship: to uphold the rigor and public trust that Environmental Assessments must earn, especially when their outcomes will set precedent for future undertakings.

1. Inadequate Consideration of the No Action Alternative
The Final EA states that a No Action Alternative was considered but dismissed from detailed analysis because it would not meet the project[rsquo]s purpose and need. This approach does not satisfy NEPA[rsquo]s requirement to include the No Action Alternative as a baseline for evaluating the environmental consequences of the Proposed Action (see 40 CFR [sect]1502.14(d) and 36 CFR [sect]220.7(b)(2)(ii)).

While the Forest Service references the verb [ldquo]may[rdquo] in [sect]220.7(b)(2)(ii) to suggest that inclusion of a No Action Alternative is discretionary, this interpretation does not align with the broader regulatory context or the agency[rsquo]s own guidance. The Council on Environmental Quality[rsquo]s regulations (40 CFR [sect]1502.14(d)) state that the No Action Alternative [ldquo]shall[rdquo] be included to facilitate comparison. The Forest Service[rsquo]s NEPA Handbook (FSH 1909.15 [sect]21.2) likewise confirms: [ldquo]The No Action Alternative is required in every EA and EIS.[rdquo] The word [ldquo]may[rdquo] in [sect]220.7(b)(2)(ii) refers to the potential inclusion of additional alternatives, not to the exclusion of the No Action Alternative altogether.

To the extent reflected in the public version of the Final EA, no substantive analysis of the environmental consequences of the No Action Alternative is presented. This omission deprives both decisionmakers and the public of a valid comparative baseline and raises concern that the agency may have narrowed its focus prematurely to the Proposed Action, potentially sidelining the broader consideration of alternatives that NEPA is designed to ensure.

While the Final EA gestures at a No Action Alternative, it offers no substantive or comparative analysis of environmental or cultural consequences, contrary to the baseline function this alternative serves under both 40 CFR [sect]1502.14(d) and the Forest Service[rsquo]s own NEPA Handbook.

2. Failure to Evaluate a Range of Reasonable Alternatives
The Final EA evaluates only the Proposed Action and summarily dismisses other alternatives without detailed or objective analysis. NEPA requires agencies to [ldquo]rigorously explore and objectively evaluate all reasonable alternatives[rdquo] (40 CFR [sect]1502.14(a)). That obligation is foundational, not discretionary.

The record does not appear to reflect an effort to consider alternative means of achieving project goals with

reduced environmental or cultural impact. In the absence of such evaluation, the agency[rsquo]s analysis seems to lack the comparative foundation required for informed public comment, responsible decision-making, and legal sufficiency.

3. Disconnect Between NEPA Significance and Section 106 Adverse Effect
The EA and DN/FONSI acknowledge that the removal of the historic Looking Glass Chairlift constitutes an adverse effect under Section 106 of the National Historic Preservation Act. Yet the DN/FONSI concludes that the project will have no significant impact under NEPA. This disconnect appears procedurally inconsistent and substantively unsupported.

A Finding of No Significant Impact cannot simply disregard a federally acknowledged adverse effect to a historic property. NEPA and NHPA operate in parallel and are mutually reinforcing. Both CEQ[rsquo]s NEPA and NHPA: A Handbook for Integrating NEPA and Section 106 (2013) and case law such as Preserve Our Heritage v. FAA seem to suggest that adverse effects under Section 106 may also rise to the level of significance under NEPA.

In this context, may reflects the need for case-by-case judgment based on impact severity, not a license to disregard such effects altogether. This stands in sharp contrast to the Forest Service[rsquo]s apparent interpretation of may in 36 CFR [sect]220.7(b)(2)(ii), where it is treated as a discretionary escape hatch to avoid analyzing the No Action Alternative. The former invites analysis; the latter evades it. NEPA requires the former.

Treating this impact as procedurally siloed not only undermines the intent of both statutes, it compromises the credibility of the impact determination as a whole and erodes public trust in the integrity of federal review.

4. Deficient Intensity and Significance Analysis
CEQ regulations (40 CFR [sect]1501.3(d)) require that agencies assess the significance of environmental effects based on ten specific intensity factors and the broader context in which they occur. While the Final EA gestures at these criteria, it does so without defined thresholds, measurable indicators, or meaningful metrics.

The EA frequently uses terms such as [ldquo]minimal[rdquo] or [ldquo]not significant[rdquo] without clear definitions or underlying data. Without quantitative benchmarks or objective measures of intensity, these assertions lack transparency and frustrate independent review. NEPA requires more than conclusory language; it demands reasoned, reviewable decision-making grounded in evidence.

5. Opaque Methodology and Lack of Cross-Referencing
The Final EA references specialist reports and consultation processes but does not clearly cite or cross-reference these documents in a way that enables the public to verify conclusions or understand the basis for key findings. If those materials exist solely in the administrative record, their omission from the main body of the EA limits both transparency and public accessibility.

This lack of methodological transparency raises broader concerns about reproducibility, analytical rigor, and scientific integrity[mdash]three pillars that are essential to NEPA compliance and public trust. Without clear articulation of data sources, analytical methods, and expert input, the review process cannot function as Congress intended.

Request for Remedy
GCHA respectfully requests:

1. That the Forest Service suspend project approval until Section 106 compliance is complete and a revised, enforceable mitigation agreement is executed;
2. That the matter be referred to the Advisory Council on Historic Preservation pursuant to 36 CFR [sect]800.7, due to failure to resolve adverse effects in accordance with federal regulations;

3. That the Forest Service issue a formal stay on all removal, disposal, or physical alteration of the Looking Glass Lift until Section 106 compliance is lawfully concluded.
4. The board believes this situation meets the Advisory Council[rsquo]s threshold for elevation, as the adverse effects remain unresolved and the case carries potential precedent for how historic ski infrastructure is treated under federal undertakings.

While this objection addresses specific concerns related to the current undertaking, we believe the broader context offers a constructive opportunity. During consultation, the agency shared the theme that [ldquo]Looking Glass is one chairlift; others will be historic and will be dismantled, too, in the coming years.[rdquo] That acknowledgment points to a foreseeable pattern of federal undertakings with similar implications for historic ski infrastructure.

In light of this, we respectfully recommend that the Forest Service explore the development of a Programmatic Agreement pursuant to 36 CFR [sect]800.14(b) to proactively guide future consultation efforts. Such an agreement would not only reduce procedural uncertainty but also ensure that preservation values are integrated early, consistently, and transparently into project planning.

We view this not as a criticism of past decisions, but as an invitation to co-create a durable framework: one that balances operational flexibility with the agency[rsquo]s responsibilities under 54 U.S.C. [sect]306101 to identify and protect historic properties. A Programmatic Agreement would signal a commitment to learning from this experience, building shared expectations, and strengthening public trust in future actions. GCHA would welcome the opportunity to assist in its development.

This moment presents a choice: to treat this objection as a procedural hurdle, or as an opportunity to strengthen the precedent we collectively set for future stewardship decisions. Our hope is that the Forest Service will view this as the latter and that together, we can build a process worthy of the place it seeks to shape.

GCHA[rsquo]s objection does not demand the retention of the Looking Glass Lift. We recognize that change is inevitable in dynamic public landscapes. Our position is grounded in process: that federal undertakings must comply with NEPA and Section 106 in both letter and spirit; that consultation must be meaningful, not performative; and that mitigation must be proportional, enforceable, and accessible to the public it is meant to serve. We raise these objections not to delay the project, but to ensure that future decisions rest on a foundation of procedural integrity. In this case, the board respectfully concludes that the foundation for a procedurally sound resolution has not yet been fully met.

Kindly confirm receipt of this objection in writing to our Executive Director, shanna@grandcountyhistory.org, and advise the board of next steps toward resolution. The GCHA Board remains committed to cooperative preservation outcomes that respect both federal process and community memory. If our understanding of the process or requirements is incomplete, we would genuinely appreciate the opportunity to clarify it. We would gladly welcome representatives from the Forest Service and/or the Advisory Council on Historic Preservation to an upcoming board call[mdash]not only to clarify any misunderstandings live with the board, but to strengthen mutual understanding and help ensure this project proceeds with procedural confidence and community trust.

Future projects will inevitably look to this one for precedent. We ask only that the precedent set here reflect not just regulatory compliance, but a shared commitment to learning: one that strengthens future collaboration, trust, and stewardship.

Respectfully,
Board of Directors, Grand County Historical Association