



UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON, D.C. 20549

DIVISION OF  
CORPORATION FINANCE

Mail Stop 3561

August 21, 2015

Curtis D. McClellan  
Chief Financial Officer and Treasurer  
ClubCorp Holdings, Inc.  
3030 LBJ Freeway, Suite 600  
Dallas, TX 75234

**Re: ClubCorp Holdings, Inc.**  
**Form 10-K for Fiscal Year Ended December 30, 2014**  
**Filed March 12, 2015**  
**File No. 001-36074**

Dear Mr. McClellan:

We have completed our review of your filing. We remind you that our comments or changes to disclosure in response to our comments do not foreclose the Commission from taking any action with respect to the company or the filing and the company may not assert staff comments as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States. We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filing to be certain that the filing include the information the Securities Exchange Act of 1934 and all applicable rules require.

Sincerely,

/s/ Lyn Shenk

Lyn Shenk  
Branch Chief  
Office of Transportation and Leisure