



May 3, 2014

Uncompahgre Field Office- Burn Canyon Trail Project
Att: Burn Canyon Travel Management
2465 South Townsend Ave
Montrose, CO 81401

RE: Burn Canyon Comprehensive Travel Management

Dear Sirs:

Please accept this correspondence as the comments of the above noted Organizations **vigorously** supporting Alternative 2 of the Proposal and our vigorous objection to the complete lack of analysis of numerous issues directly involved in the creation of the preferred alternative. The Organizations were shocked at the change in direction and intent of this proposal between scoping and development of the draft EA and are vigorously opposed to the preferred Alternative as the preferred alternative is doomed to failure. The Organizations are vigorously opposed to the failures in critical analysis of issues that will result from this change in direction in the preferred alternative. Concerns such as the lack of analysis of impacts to short and long term funding for the proposal and the repeated failures to analyze many issues against current management and the significantly expanded scope of recreational opportunities in previously undeveloped areas to be developed must be addressed in the planning process and simply have not been.

Prior to addressing the specifics of these concerns, a brief summary of the Organizations is warranted. COHVCO is a grassroots advocacy organization of approximately 2,500 members seeking to represent, assist, educate, and empower all OHV recreationists in the protection and promotion of off-highway motorized recreation throughout Colorado. COHVCO is an environmental organization that advocates and promotes the responsible use and conservation

of our public lands and natural resources to preserve their aesthetic and recreational qualities for future generations.

TPA is a 100 percent volunteer organization whose intention is to be a viable partner, working with the United States Forest Service (USFS) and the Bureau of Land Management (BLM) to preserve the sport of trail riding. The TPA acts as an advocate of the sport and takes the necessary action to insure that the USFS and BLM allocate to trail riding a fair and equitable percentage of access to public lands. For the purposes of these comments, COHVCO and TPA will be referred to as the Organizations.

1. Significant changes in the scope of proposal must be completely addressed and simply have not been.

The Organizations have significant concerns regarding the lack of meaningful analysis of many impacts that result from the changed scope of the project. Per scoping the scoping letter, the project seeks to develop a new single track multiple use trail network described as follows:

"The area currently serves as an undeveloped multiple-use trail system with connectivity to roads leading to Norwood. This trail system will fill the need for additional recreational activities, such as mountain biking, hiking, motorcycle riding and equestrian use..... BLM is preparing an environmental assessment to analyze construction of approximately 34 miles of multiple-use single track trail(maximum width of 36"), one small trailhead (approximately one acre in size), and two small parking areas (approximately 1/2 acre in size). The purpose of this project is to analyze a system of new single track trails and support facilities." ¹

While the Organizations vigorously supported the scoping in the original proposal, the Organizations are not able to support the direction now reflected in the preferred Alternative. The preferred alternative would:

"This TMP would identify and designate (see Table 1):

- 9.4 miles of motorized routes consisting of
 - 2.9 miles in ATV 2-Track travel use category for ATVs, motorcycles, and non-motorized travel;
 - 6.5 miles in 4WD-2WD travel use categories for motorized and non-motorized travel.

¹ BLM, Uncompahgre Field Office Burn Canyon scoping letter dated April 3, 2012.

- 31 miles of non-motorized routes consisting of
 - 2.8 miles in the Non-Motorized & Non-Mechanized, Single Track travel use category for hiking and horseback riding (approximately 1.3 miles of proposed route construction would occur);
 - 2.6 miles in the Non-Motorized & Non-Mechanized, Single Track and Administrative Use category for hiking, horseback riding, and full-size administrative use;
 - 25.6 miles in the Non-Motorized Single Track travel use category for hiking, horseback riding, and mechanized use (approximately 24.6 miles of proposed route construction would occur).
- 2.9 miles of routes in the Administrative Uses Only category; motorized or mechanized uses by the public would not be allowed.
- 17.9 miles closed to all modes of travel except for authorized users."²

The Organizations must highlight the scope of change in direction of this project, which was scoped to provide 34 miles of multiple use single track and has now changed to providing no miles of multiple use single track in the preferred alternative. After a brief review of the comments provided in scoping and a complete review of the EA, the Organizations are wholly unable to identify any basis or concern that could be relied on for the significant changes in the proposal that are now identified.

The Organizations would like to be able to support all trails proposals from all user groups but this simply is not realistic given agency budgets and the unwillingness of many user groups to self tax in a manner similar to the programs that have been in place as a result of the motorize users self taxing a long time ago. This failure to provide a funding stream for site development has impaired these user groups ability to partner in development of projects such as the project now sought to be developed.

2. The preferred alternative fails to address purpose and need of the proposal.

The Organizations are deeply concerned that the change in scope and direction of the project has directly impaired the ability to achieve the goals and objectives of the proposal. One of these goals is summarized in the EA as follows:

"The need is to reduce user conflicts and issues related to recreational routes, reduce impacts to sensitive resources (e.g. wildlife populations and cultural sites), and reduce other environmental impacts."³

² See, BLM Uncompahgre FO, draft EA on Norwood-Burn Canyon Comprehensive Travel Management Plan; April 2014 at pg 13. This document is hereinafter referred to as the EA.

Given the prioritization of a single user group that is not able to fund any portion of the project over multiple use recreation in the planning area will increase user conflicts. These concerns are compounded by the fact that the user group that is being excluded is the only one to pay to assist with management of their recreational usage. These concerns are further compounded as the development of the proposal impairs assertions that agency money is being properly directed towards partnering to maintain and manage existing opportunities in the field office.

The Organizations have consistently funded multiple use recreational management on the UFO through the CPW grant program, which the GAO has specifically identified as a major funding source for recreational activity. This grant program has directed several hundred thousand dollars onto the UFO for the management of multiple use recreation, despite the significant lack of specific opportunities for many of the user groups that fund the program. Here the BLM has the opportunity to provide a significant value to these partners, and the expectation of these expanded opportunity was increased by issuing the scoping letter previously. Rather than carry through with proposal in a manner that would benefit the users who have partnered with the agency to provide multiple use recreational funding, the proposal now seeks to benefit a user group that does not partner with the UFO to benefit all users.

To say this situation will result in higher levels of conflict and distrust between managers and user groups well beyond the small area to be addressed in the EA, is probably accurate and a direct result of the change in scope of the proposal. These types of concerns are highly relevant and must be addressed.

3. The preferred alternative fails to address funding for development and maintenance of facilities.

The Organizations believe basic funding is a significant question for the revised project scope. Under Alternative 2 of the Proposal significant portions of any management of the area needed for new trails could easily be addressed with the Good Management crew that is currently provided by OHV grants from the CPW grant program. By altering the scope and preferred alternative to only allow non-motorized usage of most of the routes, these resources are now unavailable as their maintenance of non-motorized trails is prohibited by both the scope of work in the grant and Colorado state laws specifying usage of these moneys that have been developed from OHV registrations.

³ EA at pg 3.

The Organizations have been heavily involved in the development of numerous trail networks throughout the state and developing funding of the projects is a major concern, both for the development and long term sustainability of the proposal. The projects would include the Tenderfoot trail proposal on the Dillon Ranger District of WRNF, the parking lot development on Rabbit Ears Pass in the Hans Peak Bears Ears RD and the Bangs Canyon trails proposal on the Grand Junction BLM Field Office. None are cheap and identifying funding has been a major issue in these proposals.

As a result of this experience, the Organizations are able to say with a high degree of confidence that the current scope of work will cost \$100,000 to \$200,000 to properly develop and manage. Development of a basic pit toilet facility, as identified in the EA frequently costs \$10,000 to \$15,000 to plan and develop for each location. In the Burn Canyon EA 3 toilet facilities are proposed which would result in a total cost of 30-45k without addressing any of the other improvements and construction to be made. By comparison, estimates place the development of a single parking lot, without a toilet, and 26 miles of multiple use single track trails on the Dillon Ranger district in exactly the range noted above. The Tenderfoot proposal is on soils that are significantly more stable than those in the Burn Canyon area, and as a result have significantly lower maintenance costs anticipated in the Tenderfoot proposal and lower costs for initial development.

The scope and direction of this proposal has significantly changed and expanded since the scoping of the proposal and this change in direction has significantly reduced the funding that would be available for the construction and ongoing maintenance of the new non-motorized trails. The Organizations consistently advocate for usage of OHV registration moneys coupled with limited federal resources for the management of federal lands for the benefit of all users. The Organizations are aware that there is a small motorized component to the project but this component is simply not significant enough to rely on for an assertion that any grants made to the OHV program would be successful. Under the current scope, the closures of routes and creation of a completely non-motorized trail network would weigh heavily against any successful grant applications being made to the OHV grant program.

The lack of funding for trail systems is an issue that has been extensively addressed in recent years. The GAO recently conducted an extensive analysis of trails funding and maintenance needs and found that only 25% of the existing trail network is financially sustainable.⁴ While

⁴ See, Government Accountability Office report to Congressional Requestors GAO-13-618; *Forest Service Trails- Long and Short term improvements could reduce maintenance backlog and enhance system sustainability*; June 2013 at pg.

this report specifically identified the major role that OHV grant programs play in mitigating this issue, the report specifically found that a lack of funding for non-motorized trails is a major contributor to the issue. While the GAO report does involve analysis of issues not relevant to the current proposal, like trail maintenance in Wilderness, the basic determination of the report must not be overlooked. Non-motorized routes are entirely unsustainable financially and the OHV communities efforts in maintaining multiple use routes is an important tool in addressing this issue. It is the Organizations position that the current proposal exacerbates a known and unresolved problem and fails to integrate a known and effective funding source. This simply makes no sense.

The Organizations have also been heavily involved in the CPW Law Enforcement Pilot, numerous discussions regarding usage of the Alpine Triangle area on the Tres Rios/San Juan NF and an active participant in the grant review process, in addition to the on-going participation of numerous site specific proposals for multiple use trail development and maintenance. It has been the Organizations uniform experience that BLM personnel simply never have any money for the management of recreation on BLM lands, regardless of the project. Given the on-going funding issues that always face the federal land managers, the Organizations believe answering the funding question is a critical component of any project. Who is going to pick up trash and maintain bathrooms that are to be built? These are important questions that are critical to the long term success of the proposal. These are costs that will increase demand on the already tragically limited agency budgets to address all recreational users.

Throughout the EA, numerous statements are made that BLM is accepting sole liability for development and maintenance of the trail network. While the Organizations are aware there may be agency funding for development of the Proposal, the Organizations are deeply concerned that if this funding has become available, why has the funding been targeted for development of a trail network that will benefit a small user group rather than address the tragic funding issues that impact all recreational usage. The Organizations vigorously assert that if federal or other funds have been obtained it should be used to maintain current levels of recreational access rather than develop new opportunities that simply are not financially sustainable in the long run. The Organizations are concerned that this decision making process is suspect at best.

In the preferred Alternative, there are significant site specific issues that will warrant significant expenditures of resources for the maintenance of the non-motorized trail network to be developed, in addition to the maintenance of normal issues like trash pickup, signage and other periodic maintenance normally experienced with trail development. The EA specifically

identifies the large amount of this project that will result in additional maintenance costs as follows:

"Compared to the No Action Alternative there would be a 51% reduction in routes, which includes a 74% reduction in motorized routes. **Approximately, 30 miles of designated (proposed or existing) routes occur on soils with a severe hazard for water erosion (Table 6), a 31% increase from the No Action Alternative. These routes may require more intensive monitoring and maintenance compared to routes on other soil types.**"⁵

The GAO report referenced previously provides some very stark photos of what unmaintained non-motorized trails utilizing highly erosive soils looks like:



Sources: GAO (left photo); copyright © Trail Wisdom LLC, used with permission (right photo).

It is the Organizations position that these impacts are unacceptable result for any user groups recreational activity and must be avoided in any plans that expand trail networks. If agency personnel are not able to fund maintenance of current opportunities, any assertion of sufficient funding being available in the future would be highly suspect.

⁵ See, EA at pg 29.

The impacts of the current partially implemented trail system are addressed in the EA, the long term impacts that would result from an expanded partially implemented trail system are not addressed. The impacts of current resource management issues that are identified as follows:

"Other actions that would increase erosion include; the lack of support facilities such as the designed trailhead, and parking facilities to the extent of the other alternatives, which would result in progressively more acres being disturbed from diffuse parking and route use."⁶

The Organizations are aware that once trails are opened, people will come and this will result in impacts regardless of funding for mitigation resources. If there are no mitigation resources, such as parking lots, maps, kiosks and toilets impacts will be substantial. Again funding for the costs and obligations is not available from state grants as there is no motorized components to the project. Usage of such money would be in violation of the terms of the grants and Colorado statutes governing usage of such funding. The lack of funding for the preferred alternative must be addressed and weighs heavily in favor of Alternative 2 simply due to the additional resources that can be brought to bear to effectively manage the proposal over the life of the project.

4. Existing dispersed parking issues will not be improved.

As previously identified, the development of parking facilities and site specific resources is a significant expense, and the Organizations must seriously question the funding that is available for development of these resources on the ground. The Organizations vigorously assert that resolution of issues similar to the ones identified in this section of the comments are critical to achieving the purpose and need for the trails proposal and to the long term success of the program. These are costs that must be addressed in providing management of basic issues such as can users camp in parking lots that are to be developed.

Without development of the parking facilities, impacts from current parking issues will simply be expanded. A lack of parking opportunities and implementation of the existing TMP decisions is repeatedly identified as a problem that is currently impacting resources in the planning area in the EA.

⁶ EA at pg 31.

"Currently, the area does not have proper maps or educational information on site to inform users of the recreation opportunities, user expectations, and/or travel management and other BLM regulations. Users are parking on the side of county roads, which are causing safety concerns, loss of vegetation, erosion, and unplanned site expansion."⁷

The Organizations agree that these materials are critically important in mitigating impacts and educating users and developing a trail system that is successful in the long run. The Organizations simply are not able to explain how these materials will be developed if there is no money to develop these resources for the area. The Organizations have to believe that simply developing these resources without changing current usage would result in a significant benefit for all user and achieve the goals and objectives of the proposal and completely avoid any possible negative impacts that would result from more opportunities that fail to address these known management issues that are currently unresolved.

The EA takes a very aggressive approach in the scope of management necessary for management of parking related issues, which is as follows:

"Travel Management Support Facilities

Proposed facilities to support the travel management plan include staging areas, trailheads, gates, and portal signs. These facilities could consist of a maximum of one acre each of disturbed surface. Facilities could include restrooms, kiosks, hardened graveled parking areas, fencing, hitching rails, vehicular control devices, native landscape islands, erosion and drainage control devices, and hardened access routes."⁸

The Organizations believe this is an ambitious proposal in terms of scope and would provide a quality recreational opportunity to users. Rather than work towards actually managing these issues, the EA simply asserts that developing new trails that are not funded and applying parking management that has been already identified as faulty will result in some type of benefit to the planning area:

"In order to limit resource impacts and help prevent new user-created routes, users would be allowed to park motorized and/or mechanized vehicles (depending on the designation of the route) immediately adjacent and parallel to

⁷ EA at pg 2.

⁸ EA at pg 9.

the BLM designated routes. Parking would be limited to one vehicle-width from the edge of the route. Users would be encouraged to park motorized or mechanized modes of travel in developed parking areas, already disturbed areas, consider safety and keep routes passable for other users."⁹

The Organizations vigorously assert that this position entirely lacks basis in law or fact. Again parking lot development is something that could be funded with an OHV grant under the previous scope of the project but would be highly problematic under the new scope of the proposal. True resolution of these issues weighs heavily in favor of alternative 2 of the proposal.

5. The expansion of adjacent opportunities for non-motorized recreational activity must be addressed.

The Organizations believe there is a critical shortage of single track multiple use trails in the state of Colorado and while all single track recreational opportunities are limited, motorized opportunities are the hardest hit usage. The San Juan National Forest provides a stark example of this issue as the San Juan National Forest contains approximately 1,250 miles of system trails. Roughly 1,000 miles are designated as closed to motorized recreation (including 400 miles in wilderness or special management areas); while 250 miles (20% of system trails) are designated as open to motorized recreation.¹⁰ These opportunities are even further limited as single track trails represent only a small portion of the 20% of system trails that are available.

Additionally the UFO has recently provided a single track non-motorized trail network outside Ridgway and significant portions of the Dominguez-Escalante NCA were designated for the benefit of non-motorized users. These are opportunities that must be balanced and weigh heavily in favor of Alternative 2 of the proposal in order to address the critical lack of motorized single track in Colorado.

6. Analysis of most resource specific issues is completely faulty.

Often benefits are asserted from moving to a designated trail system in the planning area are addressed in the EA without addressing the additional benefits that would result from a properly implemented existing route system that is currently in place. Currently these issues exist in the planning area as a result of the lack of signage, maps and other educational materials for the area that the public needs to effectively comply with restrictions. Any

⁹ See, EA at pg 8.

¹⁰ San Juan Forest - Resource Management Plan

assertion that the public can comply with restrictions that they are not aware of simply lacks merit. Rather than address these issues, the EA simply asserts more restrictions for the motorized community and more opportunity for the non-motorized users is the answer. This simply lacks logical or factual basis.

It is the Organizations position that significant impacts that will result from development of 26 miles of new routes in areas that currently are not utilized, if the proposal is not funded and managed properly. This is a significant change from current management that should be addressed. Rather than address the impacts of new trails construction, the EA repeatedly and consistently addresses impacts from OHV usage, despite the fact that the preferred Alternative has significantly less miles of OHV routes than current management. There is simply no factual basis to assert a negative impact from closing routes.

Benefits of moving from an open to existing route designation simply are not relevant to this proposal, as the area has been under existing roads and trails management standards since the adoption of the UFO TMP in 2010. If there are impacts resulting from off trail usage, these are now enforcement issues and probably the result of the specifically identified lack of signage and maps for the planning area rather than benefits of the EA. If these same management standards, such as no signage or maps for users area continued, off trail usage will continue regardless of the type of usage that is allowed. The Organizations vigorously assert that rather than attempting to assert benefits from previous management decisions, the proper question should be how to fund implementation and education of users regarding the newly adopted TMP. These concerns are more specifically addressed in previous portions of the comments.

The Organizations are deeply troubled that the analysis of many resource issues provided in the EA exhibits a similar confusion of management standards in an effort to create a position that the proposal will be a benefit and there will be no impacts. The EA must be comparing the alternatives to current management of the area rather than to each other, which is commonly the case in the EA. The Organizations vigorously assert that much of the new trail network that is to be developed is in areas that simply have no trail network currently and are outside of possible impacts from existing opportunities. Any position that building a trail in an area that currently has none probably lacks factual or scientific basis and credibility. The proper question to be addressed is does the trail network negatively impact the area, which cannot be accurately addressed by merely comparing alternatives. Funding and ongoing maintenance of the trail is a critical component of this analysis, and must address issues like the proposed alternative provides for a 31% increase in routes that are on highly erodible soils. Regardless of who is using the routes, they will need maintenance.

The Organizations must note that many of the landscape levels standards of impacts or benefits that are relied on in the EA directly conflict with USFS conclusions on this issue, which are as follows:

"Actions such as limiting grazing or closing OHV trails have historically been some of the primary tools used by land managers in southern Nevada to reduce the effects of anthropogenic stressors on species of conservation concern..... It is evident from this body of research that very little is known about the relative threats posed to, or the mitigation actions needed to protect, virtually any species, except perhaps the desert tortoise. **Too often research jumps immediately to mitigation strategies without first determining what specific factors pose the greatest threats and are the most important to mitigate. In addition, the evaluation of potential threats typically focuses upon the usual anthropogenic suspects (e.g. OHVs, livestock grazing, invasive species, and climate change) without first carefully considering which factors are most likely to pose the greatest threats.**"¹¹

Throughout the EA numerous assertions of benefits to wildlife and resources are made that do not accurately reflect best available science on issues associated with trail construction into previously unoccupied areas. Given the numerous incorrect assertions, the Organizations have included chapter 8 of the Wildlife Society manual and position on many of these issues. Research has consistently concluded that wildlife response to non-motorized recreation is consistently more extensive in terms of times and levels of response. This research has been summarized as:

"Non-motorized winter recreational activities caused 89% of monitored moose to be displaced, while snowmobiles caused 50% displacement, and trucks caused 21% displacement. Furthermore, 100% of observed moose demonstrated disturbance behaviors when disturbed by skiers and snowshoers, moving an average of 80 yards away. In contrast, 94% of moose moved 50 yards when disturbed by snowmobiles."¹²

¹¹ See, USDA Forest Service, Rocky Mountain Research Station; *The Southern Nevada Agency Partnership Science and Research Synthesis; Science to Support Land Management in Southern Nevada; Executive Summary*; August 2013 at pg 38.

¹² See, Rudd, L. T., and L. L. Irwin. 1985. Wintering moose vs. oil/gas activity in western Wyoming. *Alces* 21:279-298.

Researchers have also noted that dogs frequently illicit large response from wildlife,¹³ and Researchers have specifically concluded that elk move away from hunters without regard to the number of roads in the area, which has been summarized as:

“After eliminating the effects of primary and secondary roads, elk were farther from primitive roads than random points within the study area for all 10-day intervals except 1-10 October (Table 2). Elk were farther from secondary roads through the period of 1-10 October after which elk dispersion patterns were indistinct relative to secondary roads. Elk locations relative to primary roads were similar to those for primitive roads in that elk were increasingly closer to primary roads during the 10-day intervals from 22 August to 10 October. After 11 October, the average distance of elk to primary roads increased through 30 November.”¹⁴

These are issues and impacts that would be significantly expanded with the expansion of routes into previously undeveloped areas, where wildlife is currently able to retreat into when usage of existing routes is encountered. These retreat areas simply not available with the expanded routes, making the management question to be resolved one of identifiable impacts to the species from the loss of retreat areas rather than an improvement of habitat.

Another issue where analysis of impacts is simply faulty is with weeds and invasive species. The EA asserts:

"Approximately 17 miles of routes pass through low stature sagebrush and other vegetation which would lead to greater levels of vegetation impact, as discussed above. However, this is less than the No Action Alternative. None of the routes in the Proposed Action pass through areas of riparian vegetation. Approximately 3 acres of vegetation would be disturbed by the construction of travel management support facilities."¹⁵

This analysis simply lacks any factual basis and relationship to the scope of the proposal. The Proposal provides for an extensive new trail system in areas that are currently undeveloped.

¹³ See, Sime, C. A. 1999. Domestic Dogs in Wildlife Habitats. Pages 8.1-8.17 in G. Joslin and H. Youmans, coordinators. Effects of recreation on Rocky Mountain wildlife: A Review for Montana. Committee on Effects of Recreation on Wildlife, Montana Chapter of The Wildlife Society. 307pp..

¹⁴ Rumble, Mark A; Benkobi, Lahkdar; Gamo, Scott R; 2005. *Elk Responses to Humans in a Densely Roaded Area*; Intermountain Journal of Sciences. 11(1-2); 10-24 @ pg 17-18.

¹⁵ EA at pg 34.

Weeds and invasive species will be brought into areas and habitats that have been isolated previously. This will cause impacts that must be addressed. Monitoring and management of any outbreaks of invasive species will be problematic due the failure to provide funding for long term management. Again these are issues that the OHV Good Management crew currently in place on the UFO could easily address if this was a multiple use trail network. That maintenance and funding is illegal under the preferred alternative.

Another failure of analysis of impacts that result from management changes in the preferred alternatives involves the management of critical winter range for wildlife. These areas are consistently closed to usage. Rather than apply these management standards the EA proposes to allow foot and horse traffic as follows:

"Seasonal Closures - All designated routes in the Norwood-Burn Canyon Area would be closed to motorized and mechanized travel from December 1 to April 30 to prevent disturbance to wintering big game. Foot and horse travel would be allowed."¹⁶

There is simply no scientific basis for allowing foot and horse usage of the area during winter range times. These usages are repeatedly identified as usages that acheive the highest and longest levels of response from wildlife. Allowing these usages while excluding others will generate a minimal benefit to the species that are relying on the area as winter range. Again the Organizations assert meaningful analysis of this standard must be undertaken to develop a plan for the usage of the area.

Conclusion

The Organizations **vigorously** support the development of additional multiple use single track trails in the planning area as reflected in Alternative 2 of the EA. These trails would help address the void of motorized single track riding opportunities that currently exists in the State of Colorado and more specifically in the areas surrounding the proposal. The Organizations believe that this proposal would provide a significant resources for all users of trail network as multiple use trail opportunities are very limited in the proposal area.

¹⁶ EA at pg 14.

The Organizations are vigorously opposed to the preferred alternative that is in the EA as this will directly limit the funding that is available and directly impact the ability to actually implement any of the rather extensive mitigation tools, such as parking, maps, kiosks and other resources that are identified as necessary under both current management and the preferred alternative.

If you have questions please feel free to contact Scott Jones, Esq at 508 Ashford Drive, Longmont CO 80504. His phone is (518)281-5810 and email is scott.jones46@yahoo.com.

Sincerely,



Scott Jones, Esq.
COHVCO/TPA authorized representative

D.E. Riggle
Director of Operations
Trails Preservation Alliance

Enclosures

CC: Colorado State Parks Trails Program