



December 4, 2024

Ryan Nehl, Forest and Grassland Supervisor  
c/o Amber Wyndham  
2840 Kachina Drive  
Pueblo, CO 81008

RE: Lower North-South Vegetation Plan

Dear Ms. Wyndham:

Please accept this correspondence as the input of the Organizations significant concerns with the Lower North-South Vegetation Plan Proposal (“the Proposal”). The Organizations are intimately familiar that the planning areas is an intensely developed recreational area that has taken more than 20 years to develop and been provided millions of dollars of funding towards development and management of by the CPW OHV program. Our concerns on the Proposal include impacts to opportunities in the planning area while the fuels efforts are being undertaken, impacts to areas adjacent to the planning area while the effort is being undertaken and subsequent long-term impacts that would have to be mitigated or repaired after the fuels mitigation efforts were completed. The passing analysis of possible recreational impacts from the project to this hugely used recreational resource falls well short of the highly detailed planning we have participated in the development of in areas far less used for recreation. The Organizations continue to support the active management of forest resources through efforts such as the Proposal but we are concerned that the Proposal appears to be more an exercise in using form analysis and checking boxes in a process that has simply not engaged the public in a meaningful manner. Better information and engagement has to be achieved as this project moves forward to ensure that subsequent planners do not simply move forward to implement a proposal that fails to address recreational concerns.

Prior to addressing the specific concerns, the Organizations have regarding the Proposal, we believe a brief summary of each Organization is needed. The Colorado Off-Highway Vehicle Coalition ("COHVCO") is a grassroots advocacy organization of approximately 250,000 registered OHV users in Colorado 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. The Trail Preservation Alliance ("TPA") is a largely 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 ensure that the USFS and BLM allocate to trail riding a fair and equitable percentage of access to public lands. CORE is an entirely volunteer nonprofit motorized action group out of Buena Vista Colorado. Our mission is to keep trails open for all users to enjoy. For purposes of these comments TPA, CORE and COHVCO will be referred to as "the Organizations".

As we have previously stated, the Organizations vigorously support the active management public lands for forest health and fuels issues, given the risk this threat poses to communities across the front range and many other values on the forests. We are also vigorous supporters of these fuels efforts occurring in conjunction with other uses of these areas to the maximum extent possible. We are also aware that this type of alignment takes significant commitment and resources to execute before any thought of cutting trees even occurs and often this commitment of resources starts early in the planning process through extensive public engagement. While the Proposal outlines various steps taken to engage the public moving forward, many of these steps have not been taken to date and there has not been a good response to the efforts undertaken to date for reasons that remain unclear.

**1. The Infrastructure Act limits appeals and carries forward abbreviated NEPA process from Healthy Forest Restoration Act.**

The Organizations believe a brief review of the NEPA and planning requirements around the proposal will allow us to create understanding of our concerns and how to remedy these concerns. The Organizations are aware that in several locations in the Proposal there are general outlines of the abbreviated planning and appeal process provided for forest restoration efforts that has been provided by Congress. The Organizations have supported the alteration of analysis requirements in this manner by Congress. The Organizations have also supported previous efforts in USFS Region 2 where the response to the pine beetle and poor forest health has been treated as an emergency for planning purposes for extended periods of time.<sup>1</sup> The Organizations have also supported streamlined planning for forest health and fuels reductions, such as the Healthy Forest Restoration Act. Historically the Healthy Forest Restoration Act allowed NEPA efforts for fuels treatments to be streamlined by only needing a proposal that analyzed current management and a preferred alternative for NEPA purposes. At no point did the HFRA reduce the quality of NEPA analysis to be undertaken, it merely narrowed the scope of alternatives. This benefit was carried forward in the Infrastructure Act as follows as the scope of the limited appeals for timber and forest health efforts is clearly identified in 40807 as follows:

“(d) ADMINISTRATIVE REVIEW OF AUTHORIZED EMERGENCY ACTIONS.—An authorized emergency action carried out under this section shall not be subject to objection under the predecisional administrative review processes established under section 105 of the Healthy Forests Restoration Act of 2003 (16 U.S.C. 6515) and section 428 of the Department of the Interior, Environment, and Related Agencies Appropriations Act, 2012 (16 U.S.C. 6515 note; Public Law 112–74).”

While the Infrastructure Act confirmed and expanded some components of the NEPA effort §40806 specifically provides for public engagement under the Infrastructure Act as follows:

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<sup>1</sup> [Bark Beetles: Meeting the Challenge on a Landscape Scale | US Forest Service](#)

“(f) PUBLIC COLLABORATION.—To encourage meaningful public participation during the preparation of a project under this section, the Secretary concerned shall facilitate, during the preparation of each project—

- (1) collaboration among State and local governments and Indian Tribes; and
- (2) participation of interested persons”.<sup>2</sup>

The Organizations believe it is important to ensure that public collaboration is not minimized in these badly needed forest health and fuels mitigations projects simply to create and maintain partnerships in the area. Without proper engagement and meaningful planning to address concerns, immense conflict will result on these types of projects and impacts to other efforts will also result. These partnerships are of increasing value to everyone involved given the current budget and staffing challenges the agency is facing and the ever-growing demand for recreational access to public lands.

Even with the streamlined planning and analysis process, the use of an environmental assessment for a project of this scale is aggressive as the Proposal seeks to treat an entire Ranger District. This is simply a large project that requires significant analysis and public engagement and while this project could be completed with an EA, it would have to be a large and expansive EA. Given that the project is treating the entire Ranger District, we must ask how this was not thought to need an EIS. The Organizations submit that the current EA is brief when compared to an average EA and falls well short of the public engagement necessary to support a project of this scale. As noted subsequently in these comments, many smaller fuels projects in less visited areas have provided far more analysis of impacts than the current proposal.

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<sup>2</sup> See, Public Law 117–58 117th Congress Infrastructure Investment and Jobs Act of 2021 at §40806.

**2(a) There is a deeply concerning lack of analysis regarding possible impacts to recreational impacts from the project.**

The Organizations concerns around the brief nature of the Proposal start from our understanding of the immense levels of recreation that occur in the planning area. In 2023, the Rampart Range Motorized Management Committee undertook a consolidated effort to count the number of vehicles that were using the two primary access points to the Rampart Range motorized areas in partnership with USFS Recreation staff. This effort concluded that more than 250,000 vehicles accessed the recreation area for the year. Given that most planning efforts assume between 2-3 people per vehicle trip when doing visitation calculations, this would mean that in 2023 the Rampart Range area supported more than 500,000 visitor days.

For purposes of comparison, this would mean that the Rampart Range motorized areas would rank as the 5<sup>th</sup> most used State Park in Colorado. There can be no argument that this is a significant planning issue that must be addressed. Clearly if the State was closing a State Park even temporarily that had this level of visitation, planning would have to address impacts from shifting this number of people. This number of people will want to recreate and will go someplace if the Rampart planning area is closed or restricted. The areas that will be used by this number of visitors will need to be coordinated with and engaged appropriately, such as the Rainbow Falls Trailhead north of Woodland Park. We are unable to identify this type of coordination or management response for other areas that will have to address significant increases in visitation to those areas.

While it might be easy to dismiss this type of an issue based on a timing of cutting response, this does not resolve our concerns. While it may be easy to assert recreational access will be minimally impacted as cutting will occur in the winter, these are the seasons where most trails are closed for a variety of other concerns, such as seasonal wildlife closures. Many other areas in higher altitude areas are closed due to snowfall or other issues, making any increase in usage of those areas to absorb visitation increases impossible. Clearly the management response

cannot be to push recreational usage to areas that are closed. The need for analysis of this type of issue must also include understanding of the more limited resources available to maintain and manage these other areas. Most Districts have seasonal crews that are funded through the CPW OHV program to assist in these efforts. Most CPW crews are not in place in the winter, compounding our concerns on impacts and the need to coordinate resources around closures that are even just temporary.

After reviewing the Proposal, the Organizations are very concerned that the Proposal entirely fails to address impacts to dispersed recreation that could occur in the planning area as the fuels efforts are being undertaken. The Organizations have participated in large timber sales in other areas that impacted a wide range of infrastructure. When we have engaged on this type of project the recreational community has understood when areas are to be cut, how long closures were expected to last and what would need to be done to reopen areas. These discussions have occurred in a very open manner and addressed a wide range of issues from temporary reroutes of trails to permanent reroutes of trails, relocation of existing parking facilities that are going to be used temporarily as timber staging areas, need to maintain developed designated campsites and to many other impacts to recreational infrastructure to list in detail in these comments. Again, none of this engagement has occurred with the Proposal.

**2(b). Significant coordination is necessary to avoid long term impacts to recreational opportunities in the planning area.**

As previously noted, the planning area has been the basis of decades of planning, NEPA analysis and hundreds of thousands of dollars in OHV grants and thousands of hours of volunteer effort. This effort has resulted in a network of 36 inch wide dirt trails weaving through the planning area. In some areas, these trails these trails are wider than 36 inches but in many areas these trails are even narrower. To those not familiar with trails issues, this may appear to be a resource easily replaced, we would beg to differ. We are all too familiar with the inability to reopen trails in areas where an intervening action has occurred, regardless of if it is human or natural caused. Efforts

to reopen the Hayman Burn Scar to recreation remain ongoing despite the Hayman fire occurring more than 20 years ago. This is an example of a naturally created action that intervened in that area, but remains an example of a management situation that must be avoided.

Avoiding impacts like those from the Hayman Fire only occurs with good engagement and planning. The Organizations are less than optimistic about the ability to protect an existing 36 inch wide dirt path when the timber cutting process begins if there is not clear and direct requirements in place to address the issue in the planning process. Any assumption that these types of resources could survive being used as a skid road would be misplaced and it has been our experience this situation is rarely remedied after cutting has ceased. Once the cutting crew has left the area, it will fall to the clubs to try and mitigate impacts from the cutting effort. The timber contractor is not coming back. Without a clear understanding of what and when the impacts will be restored, we remain concerned that these impacts would not be remedied.

At the in person public meeting held on November 13, 2024 for the Proposal, representatives of the Rampart Range Motorized Management Committee were told that Appendix C of the Proposal was the answer to our concerns. Appendix C is merely a generalized summary for recreation that could be used for almost any NEPA analysis. Appendix C falls well short of the detailed information necessary for coordination and planning to avoid impacts we have seen in other efforts. The Organizations concerns about the somewhat boilerplate nature of Appendix C are compounded with the staffing and budget challenges that are facing the USFS currently are brought into the discussion. We are less than optimistic that a skeleton crew of USFS managers would be available to address impacts in the future. The Organizations concerns around the insufficiency of Appendix C of the Proposal are exemplified by the USFS outreach on the Proposal to date pg. 93 outlines a public engagement process that occurred in 2021 and interdisciplinary team meetings that occurred as well. Given the immense levels of recreation across the planning area we must ask how recreational impacts was not raised or identified in these meetings. That failure is again a concern for the sufficiency of any future efforts on the Proposal.

Our concerns compound when the exceptionally limited scale of the response to scoping for the project are reviewed as these efforts generated almost no response. The Proposal notes that scoping efforts only resulted in USFS receiving 24 comments on the Proposal.<sup>3</sup> This should have been a signal that the outreach was not connecting with the community rather than a message that the Proposal had a high level of support and there were no concerns from the community. The Organizations are simply far too familiar with what we have been calling volunteer or compassion fatigue. This has become a major issue for partners engaging with land managers at all levels given the large number of efforts being undertaken and the growing scope of competing interests now seeking to be addressed. Many times partners are being buried with engagement requests on issues that are unrelated or minimally related to the concerns of that Partner. As a result, multiple meetings may be occurring at the same time and partners may not be even attending the one that is most relevant to their concerns as they have already engaged with other efforts allegedly addressing their concerns. As a result of this compassion fatigue issues facing these groups are simply not being addressed due to the volunteer nature of these groups. This does not mean the concern is not present, only that they are unsure how to address the concern most effectively. Could this issue have appeared with the Proposal? That answer is clearly yes.

The Organizations vigorously assert that public outreach on the Proposal implementation at the site-specific level has to be better or the Proposal will only result in significant public frustration and conflict around the project. This needs to be avoided. If the Proposal seeks to implement timber management on a trail network that has had major partner support for decades and received millions in funding, the assumption that group is not interested in the project would not be accurate. Partnerships are a two-way street and assuming a partner is not interested without confirming that assumption makes a two-way street a one way street. The agency needs to make a targeted outreach effort to the group to understand why there has not been any engagement on the Proposal. Simply assuming there are no concerns from parties in the area is not acceptable.

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<sup>3</sup> See, Proposal at pg. 93.



**2(c). Alignment of competing project timelines and expectations is critically necessary.**

As the Organizations noted previously, recreational opportunities in this area have come from a long and successful partnership between managers, local clubs and the CPW OHV Grant program that has existed for decades. This partnership remains on-going as there are several projects in the planning process for development in the area. This has occurred on an almost ongoing basis over the life of the partnership, and we would expect this type of efforts to continue. The most recent effort has led to the development of a skills training area at the end of the Rampart Range road, which took an extended period of time to construct. A copy of this grant is attached as Exhibit "A" to these comments. It is important to note that any OHV grant funded project has an almost two year window between the grant being awarded and funding becoming available for the project. This cannot be shortened.

This situation results in a significant delay in projects and presents the situation where a project could be approved and then the project area could be identified for thinning in this two year period if there is not sufficient coordination of the parties. Often these projects are completed using contractors and that often means more delay and expanded coordination of schedules to avoid delays even without timber projects in the area. The Organizations would be concerned that without coordination of projects such as this and large timber sales and cutting in the area, there will be immense conflicts in completion of these projects. That must be avoided.

The Organizations are more concerned that Project coordination has not occurred even in the short term as local partners have funding in place for projects this summer and in 2026. This is a major concern as the OHV grants that fund these projects are applied in year one but funding is not received until two years out to provide time for contracting and other approvals of the funding. As a result of the poor coordination to date, there could be projects where timelines and expectations do not align already. Last thing we would want to see is a project that is already funded being delayed in completion after an area has been identified for a timber sale under the

Proposal and the motorized partners have sought to hire contractors for the project that cannot access the area.

**2(d). Fuels projects in other USFS areas has far more extensive analysis and engagement than the Proposal.**

As the Organizations noted previously, we have participated in large and small timber sales throughout the region and have successfully addressed forest health and community safety with little to no impact to recreational access. Some of these smaller projects have relied on a very informal management process as the managers and partners have known each other for decades and have a great relationship. In this situation communication can be very informal. An example of this would be a winter timber/fuels project that occurred on the Parks and Sulphur Ranger District Boundary on Illinois Pass between Gould and Grand Lake Colorado that occurred in the winter while the area was open to snowmobile suage and grooming of shared routes with the snowmobile club. This was a smaller effort in an area with lower levels of recreation that occurred with little impact given the high levels of coordination that occurred without extensive NEPA. These types of relationships have diminished over time for many reasons, which has resulted in a more formal planning and coordination process being developed.

We have attached a copy of the 2014 planning documents for coordination of recreation and timber efforts on the Canyon Lakes Ranger District for a timber sale held on the District, that did not have this type of informal structure and was working in a higher visitation area. Staff on this District was also more transitory in nature and would frequently be using an acting person to move the project. The Canyon Lakes project included a route by route analysis, an inventory of other resources and a map of the areas to be cut to allow the public to understand and identify possible concerns with the project. A copy of selected documents from this planning process area attached as Exhibit "B" to the Proposal.<sup>4</sup> This process is simply FAR more developed than anything outlined in the proposal and even with this far more significant level of analysis there

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<sup>4</sup> A full copy of this analysis is available here: [Region 2 - Home](#)

were challenges in the process. While the Proposal makes some generalized statements that could be used to develop resources such as this, there is no outline of when this would occur or any analysis of basic resources in the area. The failure of the Proposal to address resources such as this is even more concerning given the exceptionally long timeframe expected for the Proposal implementation.

The Canyon Lakes fuels efforts on recreational analysis is by no means an anomaly in terms of the level of analysis provided as similar planning and engagement was provided by the Laramie Ranger District in Southern Wyoming in 2010. Despite the process being almost 15 years old, detailed maps were provided, extensive recreational analysis was provided and documented and numerous targeted meetings were provided as well.<sup>5</sup> This engagement and analysis was provided in these areas regardless of the far lower levels of dispersed recreational visitation that was occurring in the planning area. The Laramie Ranger District efforts almost 15 years ago are a serious indication of the deficiency of the current analysis.

It is also more concerning for the Organizations as the visitation to the Red Feather/Canyon Lakes area for recreation is only a small percentage of the levels of visitation to the Rampart Range areas. Laramie Ranger District efforts were centered around recreation on the State Highway but provided far more information on dispersed recreation. Given the heightened significance of recreational opportunities in the Rampart Range area, we would submit this type of a resource would be the minimum needed for partner engagement. Relying on the informal process relied on for the Illinois Pass Project would be a significant mistake as there is no comparison between the size of the projects and levels of recreational usage in these areas. The Proposal entirely lacks any information that would allow partners to understand how fuels treatments would be occurring, when they would be occurring and timeframes to be working under. This is basic information for this type of coordination and it has not been provided.

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<sup>5</sup> A full copy of the Laramie Ranger District effort is available here: [Forest Service](#)

**3(a). USFS staffing challenges provide the need for significant additional clarity to avoid recreational impacts in the implementation of the Proposal.**

The Organizations are forced to recognize that USFS staff shifts positions that are being held all the time and we do not see an end to this type of staff movement going into the foreseeable future. Dealing with an acting person has become the norm for partners, and even if there is a permanent staff person hired employees are highly mobile. This is a major concern as there appears to be more information and planning that is to be outlined based on the discussions at the public meetings. None of this information has been included in the Proposal. We are very concerned that after several years of staff movement, this document would appear to provide sufficient in its analysis and could be moved forward without any further engagement with partner simply due to the changes in staffing at the USFS Office. Clearly and directly outlining efforts to be completed in the future will be a major step in addressing these type of challenges and avoiding unintended impacts from the project. While the need for these efforts may be understood at this point, we are not optimistic this understanding will be conveyed to future staff if it is not written down.

**3(b). Funding challenges facing the agency will not lead to greater public engagement in implementation.**

The funding situation facing the Proposal and the USFS more generally only adds to our concerns on the Proposal. Under the current Continuing Resolution, the USFS is expected to absorb between a \$500m and \$750m budget shortfall for the upcoming year, which will immediately result in employees shifting positions and programs being realigned in the short term. Candidly, the Organizations do not expect this funding trend to significantly alter for the agency given the many other challenges currently facing the Country. The Organizations are also forced to assume that the Proposal will not be a revenue generator for the agency making budget challenges around implementation more of a concern. If the Proposal does not clearly identify what work is left to be completed this effort could find funding and move forward at some point in the future quickly.

This factor again creates significant concern for the Organizations on the Proposal as managers will be seeking to mitigate fuels in the area with almost no outside funding to support the project. This is in stark contrast to the funding surge that the USFS has experienced over the last several years and while the Proposal has been developed. Even with these funding surges, public engagement has been weak. With the upcoming budget constrictions, Planners seeking to implement the Proposal will be looking for efficiencies as they will be forced to work with highly reduced funding. It has been our experience that in these situations, public engagement is one of the first costs that are reduced, which will simply compound existing shortfalls in analysis rather than remedy these shortfalls. Without clarity in what is going to be done to protect and restore recreational opportunities in the planning area, this climate will not create new standards and requirements for public engagement on these issues.

#### **4. NEPA becomes stale.**

The Organizations concerns around the Proposal expand when the timeframe of the EA is reviewed. The Proposal estimates that the timber cutting process will take 20 years to complete.<sup>6</sup> The Organizations must question how any EA would remain ripe for management action after 20 years as it is our understanding that if project level NEPA analysis is not completed with 10 years at most it is assumed to be stale and must be updated and reviewed at a minimum. This is a major concern as well.

#### **5. Executive Orders requiring an expansion of recreational opportunities issued by President Biden must be addressed in the Proposal.**

At all points relevant to the development of the Proposal, federal land managers have been under specific guidance to address possible impacts to recreational access in projects. The recent issuance of Executive Order # 14008 by President Biden on January 27, 2021 would be an example

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<sup>6</sup> See, Proposal at pg. 6

of a decision that is specifically and repeatedly outlines this requirement. §214 of EO 14008 clearly mandates improved recreational access to public lands through management as follows:

“It is the policy of my Administration to put a new generation of Americans to work conserving our public lands and waters. The Federal Government must protect America’s natural treasures, increase reforestation, **improve access to recreation**, and increase resilience to wildfires and storms, while creating well-paying union jobs for more Americans, including more opportunities for women and people of color in occupations where they are underrepresented.”

The clear and concise mandate of the EO to improve recreational access to public lands is again repeated in §215 of the EO as follows:

“The initiative shall aim to conserve and restore public lands and waters, bolster community resilience, increase reforestation, increase carbon sequestration in the agricultural sector, protect biodiversity, **improve access to recreation**, and address the changing climate.”

§217 of EO 14008 also clearly requires improvement of economic contributions from recreation on public lands as follows:

“Plugging leaks in oil and gas wells and reclaiming abandoned mine land can create well-paying union jobs in coal, oil, and gas communities while restoring natural assets, **revitalizing recreation economies**, and curbing methane emissions.”

Given the highly specific nature of these mandates, it is very concerning that the Proposal falls so short on addressing recreational access and possible impacts to recreation. This is compounded given the immense levels of recreational visitation to the Proposal areas and that

this Proposal has been developed in a time frame when there has been unprecedented funding available for public outreach and engagement.

**6. Economic impacts from unintended impacts of management must be addressed.**

The Organizations are very concerned around the possible negative economic impacts that could result from the Proposal, not only from recreational related impacts but also the possible impacts to other activities as well. Too many of our small communities' struggle to provide even basic services to their residents and tourists visiting the areas. We must wonder how many small businesses in the planning area rely on recreation to support their business and if recreation access to the planning area was lost, would be forced to close. It is very common for riders of the Rampart area to see fellow riders at the end of the day at the numerous restaurants at the intersection of US 85 and State Highway 67 in Sedalia. Without a well-rounded economic engine for the community, the community will struggle and possibly fail and this will degrade the recreational opportunities and support for them from the community and this is a concern for the Organizations.

CPW own conclusions on the economic contributions of all forms of outdoor recreation in the state of Colorado, clearly identified as a consideration to be mitigated in any NEPA analysis are as follows:

“Focusing on the state-level results below, the total economic output associated with outdoor recreation amounts to \$62.5 billion dollars, contributing \$35.0 billion dollars to the Gross Domestic Product of the state. This economic activity supports over 511,000 jobs in the state, which represents 18.7% of the entire labor force in Colorado and produces \$21.4 billion dollars in salaries and wages. In addition, this output contributes \$9.4 billion dollars in local, state and federal tax revenue.”<sup>7</sup>

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<sup>7</sup> See, CPW 2017 Statewide Comprehensive Outdoor Recreation Plan: Appendix F Pg. 111. Dated July 23, 2018.

The Organizations submit that more than \$62.5 Billion Dollars of economic contribution that results in 18.7% of the entire labor force is an economic concern to warrant specific recognition of recreation both now and in the future. Any assertion that such a massive economic contribution is insufficient to warrant inclusion in NEPA analysis simply lacks any factual basis. It would be highly frustrating to open collaborations when contributions such as this are not worthy of recognition. This type of arbitrary resolution of considerations will cause concern and frustration from the public generally, and our members more specifically, as the Proposal moves forward.

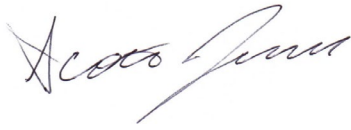
### **7. Conclusion.**

The Organizations vigorously assert at that significantly better public engagement and clarity in the proposal must be provided. While it is uncontested that the planning area sees more than 500k motorized recreational visitors per year, the analysis provided in the Proposal for recreational issues falls well below analysis we have seen in other much smaller fuels projects in areas with much lower levels of recreational visitation. We are concerned with the budget challenges facing the agency and the huge numbers of staff that are constantly moving that the Proposal could be picked up to implement by new staff in the future that are not aware of the challenges it is facing. The last thing we would want is to have closures placed on important recreation areas that have not been coordinated with local partners.

The Organizations would request that the Proposal provide significant clarity on how recreational access issues will be addressed the implementation of the Proposal. The Organizations would also ask that local clubs, such as Rampart Range Motorized Management Committee from the Denver area and the Colorado Mountain Trail Riders Association out of Colorado Springs, and the CPW Regional Trails Coordinator for the area must be specifically identified as groups that must be engaged with prior to any implementation of the Proposal. The Organizations would be more than willing to assist in these efforts as we have periodic calls and meetings with clubs throughout the region. Please feel free to contact Scott Jones, Esq. at 518-281-5810 or via email at [scott.jones46@yahoo.com](mailto:scott.jones46@yahoo.com) or Chad Hixon at 719-221-8329 or via email at [Chad@Coloradotpa.org](mailto:Chad@Coloradotpa.org) if you should wish to discuss these matters further.



Sincerely,

A handwritten signature in black ink, appearing to read "Scott Jones". The signature is fluid and cursive, with a large initial "S" and a long, sweeping tail.

Scott Jones, Esq.  
Authorized Representative- COHVCO

A handwritten signature in black ink, appearing to read "Chad Hixon". The signature is cursive and includes a large, circular flourish at the beginning.

Chad Hixon  
Executive Director - TPA

A handwritten signature in black ink, appearing to read "Marcus Trusty". The signature is cursive and somewhat stylized, with a prominent "M" and "T".

Marcus Trusty  
President – CORE