

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO**

Civil Action No. 08-cv-00917-MEH-KMT

DAVID P. SCHERER,
JOHN H. LICHT,
AARON JOHNSON,
MIKE LOPEZ, and
BARBARA BRICKLEY,

Plaintiffs,

v.

UNITED STATES FOREST SERVICE,
GLENN P. CASAMASSA, Forest Supervisor for the Arapaho and Roosevelt National Forests,
and DAVID M. GAOUETTE, United States Attorney,

Defendants.

DEFENDANTS' ANSWER TO PLAINTIFFS' SECOND AMENDED COMPLAINT

Defendants,^{1/} by and through undersigned counsel, hereby respond to Plaintiffs' Second Amended Complaint as follows:

“STATEMENT OF THE CASE”

1. The allegations set forth in this Paragraph constitute Plaintiffs' characterization of their action, to which no response is required. To the extent a response is required, the allegations are

^{1/}The term “Defendants” includes the United States Forest Service or the United States Department of Agriculture, Forest Service; Glenn P. Casamassa, Forest Supervisor for the Arapaho and Roosevelt National Forest; and David M. Gaouette, United States Attorney.

denied.

“BACKGROUND”

2. The allegations set forth in the first, second, and third sentences of this Paragraph purport to quote from or otherwise characterize the Federal Lands Recreation Enhancement Act (“REA”) and the Recreational Fee Demonstration Program Statute, each of which speaks for itself and is the best evidence of its content. The allegations set forth in the fourth sentence of this Paragraph are admitted to the extent that in 1997, the Forest Service began charging a fee at the Mt. Evans Recreation Area, rather than the Arapaho National Forest, pursuant to the Recreational Fee Demonstration Program Statute. The allegations are otherwise denied. With respect to the allegations set forth in the fifth sentence of this Paragraph, Defendants admit that prior to 2005 a fee was collected at the entrance to the Mt. Evans Recreation Area, but aver that such a fee was authorized by the Recreational Fee Demonstration Program Statute to test a cost-recovery program whereby recreational services and facilities were directly funded by recreational admission and use fees. Except as expressly admitted, the allegations are denied. The allegations set forth in the sixth sentence of this paragraph are denied.

3. The allegations set forth in the first, second, and third sentences of this Paragraph purport to characterize REA and the Recreational Fee Demonstration Program Statute, each of which speaks for itself and is the best evidence of its content. The allegations set forth in the fourth, fifth, and sixth sentences of this Paragraph purport to characterize the H.R. 3282, 108th Cong., 1st Sess. 2003 [sic] and REA, each of which speaks for itself and is the best evidence of its content. The allegations set forth in the seventh and eighth sentences of this Paragraph constitute

Plaintiffs' characterization of the issues in their action, to which no response is required. To the extent a response is required, the allegations in the seventh and eighth sentences are denied.

4. The allegations set forth in the first sentence of this Paragraph are denied. With respect to the allegations set forth in the second sentence of this Paragraph, Defendants admit that after REA was enacted, Defendants adjusted their operations at the Mt. Evans Recreation Area to comply with REA, including notification to visitors that no fee would be charged for through, non-stop travel. Except as expressly admitted, the allegations are denied. To the extent that the allegations set forth in the second sentence of this Paragraph purport to characterize a memorandum of understanding between the Forest Service and the Colorado Department of Transportation, that memorandum speaks for itself and is the best evidence of its content. The allegations set forth in the third sentence of this Paragraph are denied. With respect to the allegations set forth in the fourth sentence of this Paragraph, Defendants admit that the Mt. Evans Recreation Area has been designated as a high-impact recreation area ("HIRA"), but aver that this designation is authorized under REA and the Forest Service's Interim Implementation Guidelines on REA. Defendants further admit that a prominently displayed sign before the entrance to the HIRA states: "TRAVEL NON STOP ON ROAD NO CHARGE," to inform visitors who intend to travel non-stop through the HIRA that they do not have to pay a fee. Except as expressly admitted, the allegations are denied. The allegations set forth in the fifth sentence of this Paragraph are admitted. The allegations set forth in the sixth sentence of this Paragraph are admitted, other than to the extent they state that the State Highway 5 corridor provides scenic pullouts, which is denied. With respect to the allegations set forth in the seventh

sentence of this Paragraph, Defendants admit that the geographic boundaries of the Mt. Evans HIRA are the same as the geographic boundaries of the Mt. Evans Recreation Area, within which fees were previously collected under the Recreational Fee Demonstration Program Statute. Except as expressly admitted, the allegations are denied.

5. The allegations set forth in this Paragraph constitute conclusions of law to which no response is required. The Court is referred to REA and 16 U.S.C. § 6811 for an accurate statement of their contents.

“JURISDICTION”

6. The allegations set forth in this Paragraph constitute conclusions of law to which no response is required.

“VENUE”

7. The allegations set forth in the first sentence of this Paragraph constitute conclusions of law to which no response is required. With respect to the allegations set forth in the second sentence of this Paragraph, Defendants lack knowledge and information sufficient to form a belief as to the truth of the allegation that Plaintiffs are legal residents of the District of Colorado. Defendants admit that the United States Department of Agriculture, Forest Service is a federal agency that manages National Forest System lands located in the District of Colorado.

“PARTIES”

“Plaintiffs”

8. Defendants lack knowledge and information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore deny them.

9. Defendants lack knowledge and information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore deny them.

10. Defendants lack knowledge and information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore deny them.

11. Defendants lack knowledge and information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore deny them.

12. Defendants lack knowledge and information sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore deny them.

“Defendants”

13. Admitted, other than that the Defendant referenced in this Paragraph is properly referred to as the United States Department of Agriculture, Forest Service, and that this agency is part of the United States Department of Agriculture.

14. Admitted, with the qualification noted in Paragraph 13.

15. Admitted.

“IRREPARABLE HARM”

16. The allegations set forth in this Paragraph constitute conclusions of law to which no response is required. To the extent a response is deemed necessary, Defendants deny the allegations in this Paragraph and aver that the recreation fee for the Mt. Evans HIRA is charged for recreational use of services and amenities in the HIRA, not for parking, hiking, or bicycling in the HIRA, and that those entering the HIRA by car, by bicycle, or on foot do not have to pay the fee if they are planning to travel through the HIRA without using the services and amenities

in the HIRA. Defendants further deny that they have threatened to prosecute or have prosecuted persons for conduct engaged in by Plaintiffs in the Mt. Evans HIRA.

17. Defendants lack information and knowledge sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore deny them. Defendants aver that they have neither threatened to prosecute nor have prosecuted persons for conduct engaged in by Plaintiffs in the Mt. Evans HIRA.

18. Defendants lack information and knowledge sufficient to form a belief as to the truth of the allegations in this Paragraph, and therefore deny them. Defendants aver that the recreation fee for the Mt. Evans HIRA is charged for recreational use of services and amenities in the HIRA, not for parking, hiking, or bicycling in the HIRA, and that those entering the HIRA by car, by bicycle, or on foot do not have to pay the fee if they are planning to travel through the HIRA without using the services and amenities in the HIRA.

19. Defendants lack information and knowledge sufficient to form a belief as to the truth of the allegations set forth in the first and second sentences of this Paragraph, and therefore deny them. With respect to the allegations set forth in the third sentence of this paragraph, Defendants deny that fees are demanded for engaging in activities that Congress has said no fee is authorized for, and aver that the recreation fee for the Mt. Evans HIRA is charged for recreational use of services and amenities in the HIRA, not for parking, hiking, or bicycling in the HIRA, and that those entering the HIRA by car, by bicycle, or on foot do not have to pay the fee if they are planning to travel through the HIRA without using the services and amenities in the HIRA.

20. Defendants lack information and knowledge sufficient to form a belief as to the truth of

the allegations in this Paragraph, and therefore deny them.

21. Defendants lack information and knowledge sufficient to form a belief as to the truth of the allegations set forth in this Paragraph, and therefore deny them. Defendants aver that they have neither threatened to prosecute nor have prosecuted persons for conduct engaged in by Plaintiffs in the Mt. Evans HIRA.

22. Defendants lack information and knowledge sufficient to form a belief as to the truth of the allegations in this Paragraph, and therefore deny them. Defendants aver that the recreation fee for the Mt. Evans HIRA is charged for recreational use of services and amenities in the HIRA, not for parking, hiking, or bicycling in the HIRA, and that those entering the HIRA by car, by bicycle, or on foot do not have to pay the fee if they are planning to travel through the HIRA without using the services and amenities in the HIRA.

23. Defendants lack information and knowledge sufficient to form a belief as to the truth of the allegations in this Paragraph, and therefore deny them.

24. With respect to the allegations set forth in the first sentence of this Paragraph, Defendants deny that they have threatened to prosecute or have prosecuted persons for conduct engaged in by Plaintiffs in the Mt. Evans HIRA. Defendants aver that the charging of a standard amenity recreation fee at the Mt. Evans HIRA is authorized under REA and the Forest Service's Interim Implementation Guidelines on REA. Defendants lack information and knowledge sufficient to form a belief as to the truth of the allegations set forth in the second and third sentences of this Paragraph, and therefore deny them. Plaintiffs deny the allegations set forth in the fourth sentence of this Paragraph.

25. The allegations set forth in this Paragraph constitute Plaintiffs' conclusions of law, characterization of their case, and request for relief to which no response is required. Defendants deny that they have threatened to prosecute or prosecuted persons for conduct engaged in by Plaintiffs in the Mt. Evans HIRA. Defendants further deny that Plaintiffs are entitled to the request requested or to any relief whatsoever.

“THE STATUTORY LANGUAGE AT ISSUE”

26. The allegations set forth in this Paragraph purport to quote from and characterize 16 U.S.C. §§ 6802(f)(4) and 6802(d), each of which speaks for itself and is the best evidence of its content.

27. The allegations set forth in this Paragraph purport to quote from 16 U.S.C. § 6802(d)(1), which speaks for itself and is the best evidence of its content.

28. The allegations set forth in this Paragraph purport to characterize 16 U.S.C. § 6802(e)(2), which speaks for itself and is the best evidence of its content.

29. The allegations set forth in this Paragraph purport to characterize 16 U.S.C. § 6811(c), which speaks for itself and is the best evidence of its content.

30. The allegations set forth in this Paragraph purport to characterize 16 U.S.C. § 6811(d) and 18 U.S.C. § 3571(e), each of which speaks for itself and is the best evidence of its content.

“FACTUAL ALLEGATIONS”

31. With respect to the allegations set forth in the first sentence of this Paragraph, Defendants admit that after an assessment of the Mt. Evans Recreation Area, which is within the

Arapaho/Roosevelt National Forest, the Forest Service designated the Mt. Evans Recreation Area as a HIRA. Defendants aver that this designation is authorized under REA and the Forest Service's Interim Implementation Guidelines on REA. Defendants deny the remainder of the allegations in the first sentence of this paragraph. With respect to the allegations set forth in the second sentence of this Paragraph, Defendants admit that the geographic boundaries of the Mt. Evans HIRA are the same as the geographic boundaries of the Mt. Evans Recreation Area, within which fees were previously collected under the Recreational Fee Demonstration Program Statute. The allegations set forth in the second sentence of this Paragraph purport to characterize the Recreational Fee Demonstration Program Statute, which speaks for itself and is the best evidence of its content. Except as expressly admitted, the allegations are denied.

32. Defendants admit that the Forest Service did not promulgate additional rules or regulations when it designated the Mt. Evans Recreation Area as a HIRA, but aver that no additional rules or regulations were required to designate the Mt. Evans Recreation Area as a HIRA.

33. Defendants admit that the Forest Service did not seek public comment on designation of the Mt. Evans Recreation Area as a HIRA, but aver that REA does not require public notice and comment on continuation of existing fee areas like the Mt. Evans Recreation Area that meet the requirements of REA.

34. With respect to the allegations set forth in the first sentence of this Paragraph, Defendants deny that motorists, hikers and bicyclists are required to pay a fee for entering the HIRA, and aver that motorists, bicyclists, motorcyclists and hikers are not required to pay a fee if they state

that they will only be passing through the HIRA without stopping in it. Defendants admit that there is a fee station located on State Highway 5, approximately 0.1 miles from the intersection of State Highway 103 and State Highway 5. Defendants admit the allegations set forth in the second and third sentences of this Paragraph.

35. The allegations set forth in the first and second sentences of this Paragraph purport to characterize a memorandum of understanding between the Forest Service and the Colorado Department of Transportation, which speaks for itself and is the best evidence of its content. With respect to the allegations set forth in the second sentence of this Paragraph, Defendants admit that the Forest Service posted a prominently displayed sign before the entrance to the HIRA, which states: "TRAVEL NON STOP ON ROAD NO CHARGE," to inform visitors who intend to travel non-stop through the HIRA that they do not have to pay a fee. Except as expressly admitted, the allegations are denied. Defendants lack knowledge and information sufficient to form a belief as to the truth of the allegations set forth in the third sentence of this Paragraph.

36. Defendants deny the allegations set forth in the first sentence. With respect to allegations set forth in the second sentence of this Paragraph, Defendants admit that motorists, bicyclists, motorcyclists and hikers are not required to pay a fee if they state that they will only be passing through the HIRA without stopping in it. Except as expressly admitted, the allegations are denied.

37. The allegations set forth in this Paragraph purport to characterize a memorandum of understanding between the Forest Service and the Colorado Department of Transportation,

which speaks for itself and is the best evidence of its content. Defendants admit that, in 2008, the Forest Service placed a sign before the entrance to the HIRA which states “TRAVEL NON STOP ON ROAD NO CHARGE.”

38. Defendants admit that they have placed a sign approximately 50 feet beyond the fee station stating that parked cars must display a valid recreation pass for the next 15 miles, but deny that the view of the sign is blocked by the fee station.

39. Defendants admit that unattended vehicles must display a pass if they are parked anywhere within the HIRA, although the Forest Service does not enforce payment of the recreation fee on land under the jurisdiction of the City and County of Denver. Except as expressly admitted, the allegations in this Paragraph are denied.

40. Admitted.

41. Defendants deny the allegations set forth in this Paragraph to the extent that there are no scenic pullouts within the meaning of REA in the HIRA along State Highway 5, but rather only unpaved, undeveloped gravel pull-offs of limited width.

42. Defendants admit that the pull-offs were created by the State of Colorado in conjunction with construction of State Highway 5 and that, although the pull-offs are sometimes used by the public for recreational viewing, parking, and motor vehicle safety, they are not designed, constructed, maintained, or managed by the Forest Service for those purposes. Defendants aver that Forest Service security services and aid to travelers are available to those needing assistance at the undeveloped pull-offs along the road leading up Mt. Evans. Except as expressly admitted, the allegations are denied.

43. Admitted to the extent that the Forest Service maintains a Developed Interpretive Site with substantial federal recreational facilities, including a parking lot, four toilets, trash, interpretative displays, security and observation telescopes, at the summit of Mt. Evans, which is located at the end of State Highway 5.

44. With respect to the allegations set forth in the first sentence of this Paragraph, Defendants admit that State Highway 5 provides the only vehicular access to the federal recreational facilities at the Developed Interpretive Site at the summit of Mt. Evans. With respect to the allegations set forth in the second sentence of this Paragraph, Defendants admit that, in conducting compliance efforts, the Forest Service provides information to visitors and offers them an opportunity to pay when it is apparent that they are not merely driving non-stop through the HIRA. Defendants further admit that the opportunity to pay is offered via a blue envelope marked "NOTICE." Except as expressly admitted, the allegations in this Paragraph are denied.

45. Defendants admit the allegations set forth in this Paragraph, but aver that there are also numerous means of access to the wilderness area from outside the Mt. Evans HIRA.

46. Defendants deny the allegations set forth in the first sentence of this Paragraph, and aver that if no pass is displayed on an unattended vehicle parked within the HIRA, a notice of nonpayment is left on the vehicle. The allegations in this Paragraph purport to characterize the content of the notice of nonpayment, which speaks for itself and is the best evidence of its content. In addition, the allegations set forth in the second sentence of this Paragraph contain conclusions of law to which no response is required. To the extent a response to those allegations is deemed necessary, they are denied.

47. Admitted.

48. Denied.

49. Denied.

50. Defendants admit the allegations in this Paragraph, but aver that there are also numerous means of access to the wilderness area from outside the Mt. Evans HIRA.

51. The allegations set forth in the first, second, and third sentences of this Paragraph purport to characterize an agreement between the Forest Service and the City and County of Denver, which speaks for itself and is the best evidence of its content. With respect to the allegations set forth in the fourth sentence of this Paragraph, Defendants admit that there is no fee sharing agreement with the City and County of Denver for Echo Lake Denver Mountain Park, but Defendants lack knowledge and information sufficient to form a belief as to whether there is a Denver City or County ordinance requiring the payment of a fee.

52. Denied.

53. Defendants admit that REA authorizes them to charge visitors to the Mt. Evans HIRA a standard amenity recreation fee for use of the Mt. Evans HIRA, and that a notice of nonpayment is left on unattended vehicles parked within the HIRA. Defendants deny that the Mt. Evans HIRA contains “scenic pullouts, overlooks, or vista areas” along the road leading to the summit of Mt. Evans. Except as expressly admitted, the allegations are denied.

54. Denied.

55. Defendants admit that the Forest Service routinely patrols all areas within the Mt. Evans HIRA for customer service, safety and security, trash pickup, rock removal, road decay

identification, and visitor information as well as fee compliance. Defendants further admit that if no pass is displayed on an unattended vehicle parked within the HIRA, a notice of nonpayment is left on the vehicle. Except as expressly admitted, the allegations in this Paragraph are denied.

“CAUSE OF ACTION”

56. Defendants hereby incorporate by reference their responses to Paragraphs 1 through 55, as if pleaded in full.

57. The allegations set forth in the first, second, third, and fifth sentences of this Paragraph constitute conclusions of law to which no response is required and purport to characterize REA, which speaks for itself and is the best evidence of its content. To the extent an answer is deemed required, Defendants deny the allegations in the first, second, third, and fifth sentences. The allegations set forth in the fourth sentence of this Paragraph are denied.

58. The allegations set forth in the first sentence of this Paragraph constitute conclusions of law to which no response is required and purport to characterize REA, which speaks for itself and is the best evidence of its content. The allegations in the second sentence of this Paragraph constitute conclusions of law to which no response is required. To the extent an answer is deemed required, Defendants deny the allegations in the second sentence of this Paragraph, including the allegations of fact.

59. The allegations set forth in the first sentence of this Paragraph constitute conclusions of law to which no response is required and purport to characterize REA, which speaks for itself and is the best evidence of its content. The allegations contained in the second and third sentences of this Paragraph constitute conclusions of law to which no response is required. To

the extent an answer is deemed required, Defendants deny the allegations in the second and third sentences of this Paragraph, including the allegations of fact.

60. The allegations set forth in the first sentence of this Paragraph constitute conclusions of law to which no response is required and purport to characterize REA, which speaks for itself and is the best evidence of its content. With respect to the allegations in the second sentence of this Paragraph, Defendants admit that some areas adjacent to the State Highway 5 corridor are wilderness areas. The allegations set forth in the third sentence of this Paragraph are denied.

61. Defendants deny the allegations set forth in the first sentence of this Paragraph. The allegations set forth in the second sentence of this Paragraph constitute conclusions of law to which no response is required and purport to characterize REA, which speaks for itself and is the best evidence of its content. To the extent a response is deemed required, Defendants deny the allegations in the second sentence of this Paragraph.

62. With respect to the allegations in the first sentence of this Paragraph, Defendants admit that Summit Lake Denver Mountain Park provides access to some wilderness areas. The allegations set forth in the second sentence of this Paragraph constitute conclusions of law to which no response is required and purport to characterize REA, which speaks for itself and is the best evidence of its content. To the extent a response is deemed required, Defendants deny the allegations in the second sentence of this Paragraph.

63. The allegations set forth in this Paragraph constitute conclusions of law to which no response is required and purport to characterize REA, which speaks for itself and is the best evidence of its content. To the extent a response is deemed required, Defendants deny the

allegations in this Paragraph, including any allegations of fact.

64. The allegations set forth in the first sentence of this Paragraph constitute conclusions of law to which no response is required and purport to characterize REA, which speaks for itself and is the best evidence of its content. Defendants deny the allegations set forth in the second sentence of this Paragraph. The allegations set forth in the third sentence of this Paragraph constitute conclusions of law to which no response is required. To the extent a response is deemed required, Defendants deny the allegations in the third sentence of this Paragraph.

Defendants deny the allegations in the fourth sentence of this Paragraph.

65. The allegations set forth in the first sentence of this Paragraph constitute conclusions of law to which no response is required and purport to characterize REA, which speaks for itself and is the best evidence of its content. The allegations in the second sentence of this Paragraph constitute conclusions of law to which no response is required. To the extent a response is deemed required, Defendants deny the allegations in the second sentence of this Paragraph, including the allegations of fact, and aver that if no pass is displayed on an unattended vehicle parked within the HIRA, which meets all the requirements in REA for charging a standard amenity recreation fee for an area, a notice of nonpayment is left on the vehicle.

“NO ADMINISTRATIVE REMEDIES”

66. Defendants deny the allegations set forth in this Paragraph, and aver that both REA and the Interim Implementation Guidelines for REA provide for public involvement.

67. Defendants admit the allegations set forth in this Paragraph to the extent that the Forest Service issued the Interim Implementation Guidelines for REA, which enumerate the

requirements for a HIRA, including all nine requirements in REA for charging a standard amenity recreation fee for an area, as well as four additional requirements. Defendants further admit that the Interim Implementation Guidelines for REA were issued without providing for public notice and comment, but aver that no such public notice and comment were required.

68. The allegations set forth in this Paragraph constitute conclusions of law to which no response is required, and purport to characterize the Administrative Procedure Act, which speaks for itself and is the best evidence of its content.

69. The allegations set forth in this Paragraph constitute conclusions of law to which no response is required.

70. The allegations set forth in this Paragraph constitute conclusions of law to which no response is required.

71. The allegations set forth in this Paragraph constitute conclusions of law to which no response is required, and purport to characterize 7 U.S.C. § 6912(e), which speaks for itself and is the best evidence of its content.

72. Denied.

73. The allegations set forth in this Paragraph constitute conclusions of law to which no response is required, and purport to characterize 36 C.F.R. Part 251, Subpart C, which speaks for itself and is the best evidence of its content.

74. The allegations set forth in this Paragraph constitute Plaintiffs' characterization of their case to which no response is required, and purport to characterize 36 C.F.R. Part 217, which speaks for itself and is the best evidence of its content.

75. The allegations set forth in this Paragraph constitute Plaintiffs' characterization of their case to which no response is required, and purport to characterize 36 C.F.R. Part 215, which speaks for itself and is the best evidence of its content.

76. The allegations set forth in this Paragraph constitute Plaintiffs' characterization of their case to which no response is required, and purport to characterize 36 C.F.R. Part 218, which speaks for itself and is the best evidence of its content.

77. The allegations set forth in this Paragraph constitute Plaintiffs' characterization of their case to which no response is required, and purport to characterize 36 C.F.R. Part 251, Subpart B, which speaks for itself and is the best evidence of its content.

78. The allegations set forth in this Paragraph constitute conclusions of law to which no response is required.

79. Plaintiffs deny the allegations set forth in the first sentence of this Paragraph, and aver that there is an administrative record for this Court to review. The allegations set forth in the second and third sentences of this Paragraph constitute Plaintiffs' characterization of their case and conclusions of law to which no response is required. To the extent a response is deemed required, Defendants deny the allegations in this Paragraph.

“PRAYER FOR RELIEF”

The remaining paragraphs of Plaintiffs' Second Amended Complaint constitute their request for relief. The United States denies that Plaintiffs are entitled to the relief requested in the Complaint or to any relief whatsoever.

GENERAL DENIAL

Defendants hereby deny each and every allegation in Plaintiffs' Second Amended Complaint not previously admitted or otherwise responded to in this Answer.

Dated this 18th day of May, 2009.

Respectfully Submitted:

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Attorneys for Federal Defendants

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO
CERTIFICATE OF SERVICE (CM/ECF)**

I hereby certify that on May 18, 2009, I electronically filed Defendants' Answer to Plaintiffs' Second Amended Complaint with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following e-mail addresses:

Mebarilotti@msn.com

s/ Kathryn Liberatore
Kathryn Liberatore