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CLERK US DISTRICT COURT DISTRICT OF ARIZONA P DEPUTY			

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF ARIZONA

River Runners for Wilderness, et al.)) No. CV-06-0894 PCT-DGC	
v. Joseph F. Alston, et al.	Plaintiffs,) INTERVENOR GRAND) CANYON PRIVATE) BOATERS ASSOCIATION'S) ANSWER TO) PLAINTIFFS' COMPLAINT	
	Defendants.))	

Intervenor Grand Canyon Private Boaters Association ("GCPBA"), through counsel, hereby answers the allegations in Plaintiffs' March 28, 2006 "Complaint for Declaratory and Injunctive Relief" (hereinafter "Complaint") as follows:

INTRODUCTION

- 1. The allegations contained in this paragraph consist of Plaintiffs' characterization of the case and require no response. To the extent that a response it required, GCPBA denies the allegations.
- 2. The allegations contained in this paragraph consist of Plaintiffs' characterization of the case and require no response. To the extent that a response is required, GCPBA denies the allegations.

- 3. The allegations contained in this paragraph consist of conclusions of law, to which no response is required. To the extent that a response is required, GCPBA denies the allegations.
- 4. The allegations contained in this paragraph consist of conclusions of law, to which no response is required. To the extent that a response is required, GCPBA denies the allegations.
- 5. The allegations contained in this paragraph consist of conclusions of law, to which no response is required. To the extent that a response is required, GCPBA denies the allegations.
- 6. The allegations contained in this paragraph consist of Plaintiffs' characterization of the case and require no response. To the extent that a response is required, GCPBA denies the allegations.

JURISDICTION AND VENUE

- 7. GCPBA admits the allegation in paragraph 7.
- 8. GCPBA admits the allegation in paragraph 8.
- 9. GCPBA admits the allegation in paragraph 9.
- 10. GCPBA admits the allegation in paragraph 10.
- 11. The allegations contained in this paragraph consist of conclusions of law concerning Plaintiff's alleged ground for jurisdiction to which no response is required.
 - 12. GCPBA admits the allegation in paragraph 12.

PARTIES

- 13. GCPBA possesses insufficient information or knowledge to form an opinion as to the truth of the allegations contained in this paragraph and therefore denies them.
- 14. GCPBA possesses insufficient information or knowledge to form an opinion as to the truth of the allegations contained in this paragraph and therefore denies them.
- 15. GCPBA possesses insufficient information or knowledge to form an opinion as to the truth of the allegations contained in this paragraph and therefore denies them.
- 16. GCPBA possesses insufficient information or knowledge to form an opinion as to the truth of the allegations contained in this paragraph and therefore denies them.
 - 17. GCPBA denies the allegations in this paragraph.
- 18. GCPBA admits the allegations in the first two sentences of paragraph

 18. GCPBA possesses insufficient information regarding the allegations in the third
 sentence and therefore denies the same.
- 19. GCPBA admits the allegations in the first two sentences of paragraph
 18. GCPBA possesses insufficient information regarding the allegations in the third
 sentence and therefore denies the same.
- 20. GCPBA admits that Defendant National Park Service is an agency of the U.S. Department of the Interior. GCPBA possesses insufficient information or

knowledge to form an opinion as to the truth of the remaining allegations contained in this paragraph and therefore denies them.

- 21. GCPBA admits that Gale Norton formerly was the Secretary of the U.S. Department of the Interior. GCPBA possesses insufficient information or knowledge to form an opinion as to the truth to the remaining allegations contained in this paragraph and therefore denics them.
- 22. GCPBA admits that Defendant U.S. Department of the Interior is a department of the United States government. GCPBA possesses insufficient information or knowledge to form an opinion as to the truth of the remaining allegations contained in this paragraph and therefore denies them.
 - 23. GCPBA admits the allegations in this paragraph.
 - 24. GCPBA admits the allegations in this paragraph.
 - 25. GCPBA admits the allegations in this paragraph.
 - 26. GCPBA admits the allegations in this paragraph.
 - 27. GCPBA admits the allegations in this paragraph.
- 28. The allegations contained in this paragraph purport to characterize an unidentified document, which speaks for itself and contains the best evidence of its contents, and thus no response is required.
- 29. GCPBA admits that the Colorado River through the Park provides world class primitive and unconfined river recreation and unique geological features and other special qualities, and lacks sufficient information upon which to admit or deny the remaining allegations in this paragraph.
 - 30. GCPBA admits the allegations in this paragraph.

- 31. GCPBA admits the allegations in this paragraph.
- 32. To the extent that the allegations contained in this paragraph purport to characterize specified documents, those documents speak for themselves and contain the best evidence of their contents, and thus no response is required. GCPBA admits that the Colorado River in the Park runs through some of the most scenic areas of the Park, and denies the remainder of this paragraph.
- 33. The allegations contained in this paragraph consist of conclusions of law, to which no response is required. To the extent that a response is required, GCPBA lacks sufficient information to admit or deny the allegations and therefore denies them.
- 34. The allegations contained in this paragraph purport to characterize an unidentified document, which speaks for itself and contains the best evidence of its contents, and thus no response is required.
- 35. GCPBA admits that a private permit for a trip on the Colorado River in the Park is highly sought after. GCPBA lacks sufficient information upon which to admit or deny the remainder of paragraph 35 and therefore denies the same.
 - 36. GCPBA admits the allegations in paragraph 36.
 - 37. GCPBA denies the allegations in this paragraph.
- 38. The allegations in the first sentence purport to characterize the 1972 River Use Plan, which speaks for itself and contains the best evidence of its contents, and thus no response is required. The remaining allegations in this paragraph are not clearly attributed to the 1972 Plan or any other source and GCPBA lacks sufficient information to admit or deny them.

- 39. GCPBA possesses insufficient information or knowledge to form an opinion as to the truth of the allegations contained in this paragraph, and on this basis denies the allegations.
- 40. GCPBA possesses insufficient information or knowledge to form an opinion as to the truth of the allegations contained in this paragraph, and on this basis denies the allegations.
- 41. The allegations contained in this paragraph purport to characterize specified documents, which speak for themselves and contain the best evidence of their contents, and thus no response is required.
- 42. The allegations contained in this paragraph purport to characterize a specified document, which speaks for itself and contains the best evidence of its contents, and thus no response is required.
- 43. The allegations contained in this paragraph purport to characterize a specified document, which speaks for itself and contains the best evidence of its contents, and thus no response is required.
- 44. The allegations contained in this paragraph purport to characterize a specified document, which speaks for itself and contains the best evidence of its contents, and thus no response is required.
- 45. The allegations contained in this paragraph purport to characterize a specified document, which speaks for itself and contains the best evidence of its contents, and thus no response is required.

- 46. The allegations contained in this paragraph purport to characterize a specified document, which speaks for itself and contains the best evidence of its contents, and thus no response is required.
- 47. The allegations contained in this paragraph purport to characterize a specified document, which speaks for itself and contains the best evidence of its contents, and thus no response is required.
- 48. The allegations contained in this paragraph purport to characterize a specified document, which speaks for itself and contains the best evidence of its contents, and thus no response is required.
- 49. The allegations contained in this paragraph purport to characterize a specified document, which speaks for itself and contains the best evidence of its contents, and thus no response is required.
- 50. The allegations contained in this paragraph purport to characterize a specified document, which speaks for itself and contains the best evidence of its contents, and thus no response is required.
- 51. The allegations contained in this paragraph purport to characterize a specified document, which speaks for itself and contains the best evidence of its contents, and thus no response is required.
- 52. The allegations contained in this paragraph purport to characterize a specified document, which speaks for itself and contains the best evidence of its contents, and thus no response is required.

- 53. The allegations contained in this paragraph purport to characterize a specified document, which speaks for itself and contains the best evidence of its contents, and thus no response is required.
- 54. The allegations contained in this paragraph purport to characterize a specified document, which speaks for itself and contains the best evidence of its contents, and thus no response is required.
- 55. The allegations contained in this paragraph purport to characterize a specified document, which speaks for itself and contains the best evidence of its contents, and thus no response is required.
- 56. GCPBA admits the first sentence of this paragraph. The allegations contained in the second sentence of this paragraph purport to characterize a specified document, which speaks for itself and contains the best evidence of its contents, and thus no response is required.
- 57. The allegations contained in this paragraph purport to characterize a specified document, which speaks for itself and contains the best evidence of its contents, and thus no response is required.
- 58. The allegations contained in this paragraph purport to characterize a specified document, which speaks for itself and contains the best evidence of its contents, and thus no response is required.
- 59. The allegations contained in this paragraph purport to characterize an Act of Congress, which speaks for itself and contains the best evidence of its contents, and thus no response is required.

- 60. The allegations contained in this paragraph purport to characterize a specified document, which speaks for itself and contains the best evidence of its contents, and thus no response is required.
- 61. The allegations contained in this paragraph purport to characterize a specified document, which speaks for itself and contains the best evidence of its contents, and thus no response is required.
- 62. The allegations contained in this paragraph purport to characterize a specified document, which speaks for itself and contains the best evidence of its contents, and thus no response is required.
- 63. The allegations contained in this paragraph purport to characterize a specified document, which speaks for itself and contains the best evidence of its contents, and thus no response is required.
- 64. The allegations contained in this paragraph purport to characterize a specified document, which speaks for itself and contains the best evidence of its contents, and thus no response is required.
- 65. The allegations contained in this paragraph purport to characterize a specified document, which speaks for itself and contains the best evidence of its contents, and thus no response is required.
- 66. The allegations contained in this paragraph consist of conclusions of law, to which no response is required. To the extent that a response is required, GCPBA denies the allegations.

- 67. The allegations contained in this paragraph purport to characterize a specified document, which speaks for itself and contains the best evidence of its contents, and thus no response is required.
- 68. The allegations contained in this paragraph purport to characterize a specified document, which speaks for itself and contains the best evidence of its contents, and thus no response is required.
- 69. The allegations contained in this paragraph purport to characterize a specified document, which speaks for itself and contains the best evidence of its contents, and thus no response is required.
- 70. The allegations contained in this paragraph purport to characterize a specified document, which speaks for itself and contains the best evidence of its contents, and thus no response is required.
- 71. The allegations contained in the first and second sentences of this paragraph purport to characterize a specified document, which speaks for itself and contains the best evidence of its contents, and thus no response is required. GCPBA lacks sufficient information on which to admit or deny the last sentence of this paragraph and therefore denies them.
- 72. The allegations contained in this paragraph purport to characterize a specified document, which speaks for itself and contains the best evidence of its contents, and thus no response is required.
- 73. The allegations contained in this paragraph purport to characterize a specified document, which speaks for itself and contains the best evidence of its contents, and thus no response is required.

- 74. The allegations contained in this paragraph purport to characterize a specified document, which speaks for itself and contains the best evidence of its contents, and thus no response is required.
- 75. The allegations contained in this paragraph purport to characterize a specified document, which speaks for itself and contains the best evidence of its contents, and thus no response is required.
- 76. The allegations contained in this paragraph purport to characterize a specified document, which speaks for itself and contains the best evidence of its contents, and thus no response is required.
 - 77. GCPBA admits the allegations in this paragraph.
- 78. The allegations contained in this paragraph purport to characterize a specified document, which speaks for itself and contains the best evidence of its contents, and thus no response is required.
- 79. The allegations contained in this paragraph purport to characterize a specified document, which speaks for itself and contains the best evidence of its contents, and thus no response is required.
 - 80. GCPBA admits the allegations in this paragraph.
- 81. The allegations contained in this paragraph purport to characterize a specified document, which speaks for itself and contains the best evidence of its contents, and thus no response is required.
- 82. The allegations contained in this paragraph purport to characterize a specified document, which speaks for itself and contains the best evidence of its contents, and thus no response is required.

- 83. The allegations contained in this paragraph purport to characterize a specified document, which speaks for itself and contains the best evidence of its contents, and thus no response is required.
- 84. The allegations contained in this paragraph purport to characterize a specified document, which speaks for itself and contains the best evidence of its contents, and thus no response is required.
 - 85. GCPBA admits the allegations in this paragraph.
- 86. The allegations contained in this paragraph purport to characterize an unspecified document, which speaks for itself and contains the best evidence of its contents, and thus no response is required.
- 87. The allegations contained in this paragraph purport to characterize an unspecified document, which speaks for itself and contains the best evidence of its contents, and thus no response is required.
 - 88. GCPBA denies the allegations contained in this paragraph.
- 89. GCPBA admits that demand by private boaters for permits to boat on the Colorado River has increased since 1981. GCPBA lacks sufficient information to admit or deny the remainder of the allegations in this paragraph and therefore denies them.
- 90. GCPBA admits that demand by private boaters for permits to boat on the Colorado River has increased. GCPBA lacks sufficient information to admit or deny the remainder of the allegations in this paragraph and therefore denies them.

- 91. GCPBA admits that commercial concessionaires are not subject to the waiting list. GCPBA lacks sufficient information to admit or deny the remainder of the allegations contained in this paragraph.
 - 92. GCPBA denies the allegations contained in this paragraph.
- 93. The allegations contained in this paragraph purport to characterize certain documents, which speak for themselves and contain the best evidence of their contents, and thus no response is required.
- 94. GCPBA admits that, after a public scoping process, the National Park Service released its Draft Environmental Impact Statement for the Colorado River Management Plan, Grand Canyon National Park, Grand Canyon, Arizona, in October 2004. The remaining allegations contained in this paragraph purport to characterize this document, which speaks for itself and contains the best evidence of its contents, and thus no response is required.
- 95. GCPBA possess insufficient information or knowledge to form an opinion as to the truth of the allegations contained in this paragraph.
- 96. GCPBA admits the allegations contained in the first sentence of this paragraph. The remaining allegations contained in this paragraph purport to characterize a specified document, which speaks for itself and contains the best evidence of its contents, and thus no response is required.
- 97. The allegations contained in this paragraph purport to characterize a specified document, which speaks for itself and contains the best evidence of its contents, and thus no response is required.

- 98. The allegations contained in this paragraph purport to characterize a specified document, which speaks for itself and contains the best evidence of its contents, and thus no response is required.
- 99. The allegations contained in this paragraph purport to characterize a specified document, which speaks for itself and contains the best evidence of its contents, and thus no response is required.
- 100. The allegations contained in this paragraph purport to characterize a specified document, which speaks for itself and contains the best evidence of its contents, and thus no response is required.
- 101. The allegations contained in this paragraph consist of conclusions of law, to which no response is required. To the extent that a response is required, GCPBA denies the allegations.
- 102. The allegations contained in this paragraph purport to characterize a specified document, which speaks for itself and contains the best evidence of its contents, and thus no response is required.
 - 103. GCPBA admits the allegations contained in this paragraph.
- 104. The allegations contained in this paragraph purport to characterize a specified document, which speaks for itself and contains the best evidence of its contents, and thus no response is required.
- 105. The allegations contained in this paragraph purport to characterize a specified document, which speaks for itself and contains the best evidence of its contents, and thus no response is required. The allegations contained in the first sentence of this

paragraph also consist of conclusions of law, to which no response it required. To the extent that a response is required, GCPBA denies the allegations.

- 106. The allegations contained in this paragraph consist of conclusions of law, to which no response is required. To the extent that a response is required, GCPBA denies the allegations.
- 107. The allegations contained in this paragraph consist of conclusions of law, to which no response is required. To the extent that a response is required, GCPBA denies the allegations.
- 108. GCPBA possesses insufficient information or knowledge to form an opinion as to the truth of the allegations contained in this paragraph and therefore denies them.
- 109. GCPBA possesses insufficient information or knowledge to form an opinion as to the truth of the allegations contained in this paragraph and therefore denies them.

CLAIMS FOR RELIEF

COUNT 1

- 110. GCPBA hereby repeats and incorporates by reference its answers to all preceding paragraphs as if fully stated herein.
- 111. The allegations contained in this paragraph consist of conclusions of law, to which no response is required. To the extent that a response is required, GCPBA denies the allegations.
- 112. The allegations contained in this paragraph purport to characterize a federal statute, which speaks for itself and contains the best evidence of its contents, and

thus no response is required. The allegations contained in this paragraph also contain conclusions of law, to which no response is required.

- 113. The allegations contained in this paragraph purport to characterize

 National Park Service management policies and Reference Manual #41, which speak for
 themselves and contain the best evidence of their contents, and thus no response is
 required.
- 114. The allegations contained in this paragraph purport to characterize a federal regulation, which speaks for itself and contains the best evidence of its contents, and thus no response is required. The allegations contained in this paragraph also contain conclusions of law, to which no response is required.
- National Park Service management policies, which speak for themselves and contain the best evidence of their content, and thus no response is required. The allegations contained in this paragraph also consist of conclusions of law, to which no response is required. To the extent that a response is required, GCPBA denies the allegations.
- 116. The allegations contained in this paragraph purport to characterize unidentified documents, which speak for themselves and contain the best evidence in their contents, and thus no response is required.
- 117. The allegations contained in this paragraph purport to characterize National Park Service management policies, which speak for themselves and contain the best evidence of their contents, and thus no response is required. The allegations contained in this paragraph also consist of conclusions of law, to which no response is required. To the extent a response is required, GCPBA denies the allegations.

- National Park Service management policies, which speak for themselves and contain the best evidence of their contents, and thus no response is required. The allegations contained in this paragraph also consist of conclusions of law, to which no response is required. To the extent a response is required, GCPBA denies the allegations.
- 119. The allegations contained in this paragraph consist of conclusions of law, to which no response is required.
- 120. The allegations contained in this paragraph purport to characterize a specified document, which speaks for itself and contains the best evidence of its contents, and thus no response is required.
- 121. The allegations contained in this paragraph purport to characterize a specified document, which speaks for itself and contains the best evidence of its contents, and thus no response is required.
- 122. The allegations contained in this paragraph purport to characterize a specified document, which speaks for itself and contains the best evidence of its contents, and thus no response is required.
- 123. The allegations contained in the first sentence of this paragraph purport to characterize a specified document, which speaks for itself and contains the best evidence of its contents, and thus no response is required. The allegations contained in the second sentence of this paragraph consist of conclusions of law, to which no response is required.
- 124. The allegations contained in the first, second, and third sentences of this paragraph purport to characterize the Wilderness Act, which speaks for itself and

contains the best evidence of its contents, and thus no response is required. The allegations contained in the last sentence of this paragraph consist of conclusions of law, to which no response is required.

- 125. The allegations contained in this paragraph purport to characterize a specified document, which speaks for itself and contains the best evidence of its contents, and thus no response is required.
- 126. The allegations contained in this paragraph purport to characterize specified documents, which speak for themselves and contains the best evidence of their contents, and thus no response is required.
- 127. The allegations contained in this paragraph purport to characterize specified documents, which speak for themselves and contains the best evidence of their contents, and thus no response is required.
- 128. The allegations contained in this paragraph consist of conclusions of law, to which no response is required. To the extent that a response is required, GCPBA denies the allegations.
- 129. The allegations contained in this paragraph consist of conclusions of law, to which no response is required. To the extent that a response is required, GCPBA denies the allegations.
- 130. The allegations contained in this paragraph consist of conclusions of law, to which no response is required. To the extent that a response is required, GCPBA denies the allegations.

- 131. The allegations contained in this paragraph consist of conclusions of law, to which no response is required. To the extent that a response is required, GCPBA denies the allegations.
 - 132. GCPBA denies the allegations of this paragraph.
- 133. The allegations contained in this paragraph consist of conclusions of law, to which no response is required. To the extent that a response is required, GCPBA denies the allegations.

COUNT II

- 134. GCPBA hereby repeats and incorporates by reference its answers to all preceding paragraphs as if fully stated herein.
- 135. The allegations contained in this paragraph consist of conclusions of law, to which no response is required. To the extent a response is required, GCPBA denies the allegations.
- 136. The allegations contained in this paragraph consist of conclusions of law, to which no response is required. To the extent that a response is required, GCPBA denies the allegations.
- 137. The allegations contained in this paragraph purport to characterize specified documents, which speak for themselves and contain the best evidence of their contents, and thus no response is required.
- 138. The allegations contained in this paragraph purport to characterize a specified document, which speaks for itself and contains the best evidence of its contents, and thus no response is required.
 - 139. GCPBA denies the allegations contained in this paragraph.

- 140. The allegations contained in the first sentence of this paragraph purport to characterize specified documents, which speak for themselves and contain the best evidence of their contents, and thus no response is required. The allegations contained in the second sentence of this paragraph consist of conclusions of law, to which no response is required. To the extent a response is required, GCPBA denies the allegations.
- 141. The allegations contained in this paragraph consist of conclusions of law, to which no response is required. To the extent that a response is required, GCPBA denies the allegations.
- 142. The allegations contained in this paragraph consist of conclusions of law, to which no response is required. To the extent that a response is required, GCPBA denies the allegations.

COUNT III

- 143. GCPBA hereby repeats and incorporates by reference its answers to all preceding paragraphs as if fully stated herein.
- 144. The allegations contained in this paragraph consist of conclusions of law, to which no response is required. To the extent that a response is required, GCPBA denies the allegations.
- 145. The allegations contained in this paragraph purport to characterize an Act of Congress, which speaks for itself and contains the best evidence of its contents, and thus no response is required.
- 146. The allegations contained in this paragraph purport to characterize

 National Park Service management policies, which speak for themselves and contain the
 best evidence of their contents, and thus no response is required.

- 147. The allegations contained in this paragraph purport to characterize

 National Park Service management policies, which speak for themselves and contain the
 best evidence of their contents, and thus no response is required.
- 148. The allegations contained in this paragraph purport to characterize National Park Service management policies, which speak for themselves and contain the best evidence of their contents, and thus no response is required.
- 149. The allegations contained in this paragraph purport to characterize

 National Park Service management policies, which speak for themselves and contain the
 best evidence of their contents, and thus no response is required.
- 150. The allegations contained in this paragraph purport to characterize National Park Service management policies, which speak for themselves and contain the best evidence of their contents, and thus no response is required.
- 151. The allegations contained in this paragraph purport to characterize National Park Service management policies, which speak for themselves and contain the best evidence of their contents, and thus no response is required.
- 152. GCPBA admits that natural quiet and the opportunity to experience solitude are resources provided by the Park. GCPBA denies the balance of the allegations in this paragraph.
- 153. The allegations contained in this paragraph purport to characterize a specified document, which speaks for itself and contains the best evidence of its contents, and thus no response is required.

- 154. The allegations contained in this paragraph purport to characterize a specified document, which speaks for itself and contains the best evidence of its contents, and thus no response is required.
- 155. The allegations contained in this paragraph purport to characterize a specified document, which speaks for itself and contains the best evidence of its contents, and thus no response is required.
 - 156. GCPBA denies the allegations contained in this paragraph.
- 157. The allegations contained in the first sentence of this paragraph purport to characterize specified documents, which speak for themselves and contain the best evidence of their contents, and thus no response is required. The allegations contained in this paragraph also contain conclusions of law, to which no response is required. To the extent a response is required, GCPBA denies the allegations.
- 158. The allegations contained in this paragraph contain conclusions of law, to which no response is required. To the extent a response is required, GCPBA denies the allegations.

COUNT IV

- 159. GCPBA hereby repeats and incorporates by reference its answers to all preceding paragraphs as if fully stated herein.
- 160. The allegations contained in this paragraph consist of conclusions of law, to which no response is required. To the extent a response is required, GCPBA denies the allegations.
- 161. The allegations contained in this paragraph purport to characterize a federal statute, which speaks for itself and contains the best evidence of its contents, and

thus no response is required. The allegations contained in this paragraph also contain conclusions of law, to which no response is required.

- 162. GCPBA admits that visitor use of the river must be limited to protect natural resources and that the Park Service has chosen a split allocation system. GCPBA denies the remaining allegations of this paragraph.
- 163. The allegations contained in the first sentence of this paragraph purport to characterize specified documents, which speak for themselves and contain the best evidence of their contents, and thus no response is required. The allegations contained in this paragraph also contain conclusions of law, to which no response is required. To the extent a response is required, GCPBA denies the allegations.
 - 164. GCPBA denies the allegations contained in this paragraph.
- 165. The allegations in this paragraph purport to characterize specified documents, which speak for themselves and contain the best evidence of their contents, and thus no response is required.
- 166. The allegations contained in this paragraph contain conclusions of law, to which no response is required. To the extent a response is required, GCPBA denies the allegations.

COUNT V

- 167. GCPBA hereby repeats and incorporates by reference its answers to all preceding paragraphs as if fully stated herein.
- 168. The allegations contained in this paragraph consist of conclusions of law, to which no response is required. To the extent a response is required, GCPBA denies the allegations.

- 169. The allegations contained in this paragraph consist of conclusions of law, to which no response is required. To the extent a response is required, GCPBA admits the allegations.
- 170. The allegations contained in this paragraph consist of conclusions of law, to which no response is required.
- 171. The allegations contained in this paragraph purport to characterize National Park Service management policies, which speak for themselves and contain the best evidence of their contents, and thus no response is required.
- 172. The allegations contained in this paragraph consist of conclusions of law, to which no response is required. To the extent a response is required, GCPBA denies the allegations.
- 173. The allegations contained in this paragraph consist of conclusions of law, to which no response is required. To the extent a response is required, GCPBA denies the allegations.
- 174. The allegations contained in this paragraph consist of conclusions of law, to which no response is required. To the extent a response is required, GCPBA denies the allegations.

REQUEST FOR RELIEF

The remaining paragraphs of Plaintiffs' Complaint labeled A through F on page 35 constitute Plaintiffs' requests for relief, to which no answers are required. To the extent answers are deemed necessary, GCPBA denies that Plaintiffs are entitled to the relief requested or to any relief whatsoever.

Dated this 24th day of July, 2006.

Respectfully submitted,

Lori Potter (CO Bar No. 12118)

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