

Dear PCDC, BOT, Town Staff, and Mayor O'Brien,

Thank you in advance for taking my input into consideration. We are again considering permanent zoning changes before all the evidence has been gathered regarding noise ordinance violations during events at River Bend? That's surprising given the history of this issue and the lack of verifiable progress on the issues raised during the last round between the BOT, River Bend / Lyons Properties LLC, and concerned neighbors.

I do appreciate that due process requires that you consider business brought before the BOT in a structured and timely way. However, my wife and I oppose permanent zoning changes to River Bend at this time, and at any time before the evidence is in.

There appears to be a "grassroots" campaign to get the permanent zoning changes done prematurely. For example, it is intimated in the Lyons Advocacy email blast that a permanent zoning change for River Bend is required for

"allowing Lyons to continue weddings, dinners, fundraisers and Tiny Home Lodging".

This statement seems to be purposefully misleading and hyperbolic. Am I wrong? Weddings, dinners, fundraisers, and the WeeCasa Tiny Home business are all taking place in this spot (among several other spots), unimpeded by zoning.

Of course there is some uncertainty in planning for the River Bend stakeholders and owners due to the lack of permanent zoning, but their ability to make money has not been impeded directly by the temporary zoning in place post-flood. It's been impeded, perhaps, by existing violations of existing ordinances and nuisance complaints, but the temporary zoning flexibility shown by the town has actually enabled the River Bend stakeholders to make money.

We respectfully request, as affected homeowners and Lyons residents, that you put off the permanent zoning business until sufficient anecdotal and empirical evidence has been gathered about noise and other impacts. That means concretely: Tabling this business now, and any other time it's raised, until well into the wedding/events/festival season. And also, gathering evidence during the continuing trial period. It was well established, after last fall's season, that the noise issues were unresolved. We have not yet observed how the Tiny Homes lodging will affect the Festival dynamics, either.

Our final question is not a rhetorical one: Where is the data to support the continuous assertions that River Bend's rezoning to commercial is necessary for Lyons' fiscal well being? There are several other wedding venues in town that have been established long before the flood. What is their impact on Lyons' ability to extract tax and other revenue? What is their impact with respect to other possible projects, businesses, venues, and town projects?

Sincerely,

Andy Kowles and Rie Shinoda Kowles  
811 Upper 5th Ave

Patrick Thomas  
601 Indian Lookout Rd  
PO Box 1773  
Lyons, CO 80540

March 9, 2015

Lyons Planning and Community Development Commission (PCDC), Lyons Board of Trustees (BOT), Lyons Town Staff, Lyons Mayor John O'Brien  
432 5<sup>th</sup> Ave  
PO Box 49  
Lyons, CO 80540

Subject: River Bend Permanent Zoning

Dear PCDC, BOT, Town Staff, and Mayor O'Brien:

Thank you for the opportunity to express our concerns regarding the latest zoning change proposal submitted on behalf of the River Bend venue and its parent company, Lyons Properties, LLC. We appreciate the progress River Bend has made in regards to its noise since it opened, but we are asking them to be held accountable to their promise to be good neighbors before they are granted any permanent zoning change.

Our concerns regarding the development of this property mainly center around the noise issue we have experienced for almost two full summers' worth of weekend evenings, due (mostly) to weddings with amplified music at this venue.

The latest proposal does address many of our concerns in theory, but in reality there has still been no resolution to the noise issue. Extremely loud, amplified events were still taking place in Oct. 2015, at the end of their wedding season. We recognize and appreciate River Bend's continued assurance that the amplification will be addressed in the 2016 season and beyond, but until we see (and "hear") these assurances in practice, we cannot support any permanent zoning change.

In addition, the latest proposal contains a commitment by River Bend to limit live entertainment to non-amplified instruments, and we agree and appreciate that this is a move in the right direction. However, the very next bullet allows for **amplified background music, vocals, and PA system**. It has the usual verbiage regarding minimum sound levels and eliminating sounds found to be objectionable by the Town Administrator, but these are the same assurances we received last summer that were not effective.

The fact is that any and all amplification used at River Bend can and will be heard at our house and those of our neighbors, even inside our homes with our doors and windows shut in some cases. This lessens our quality of life and makes it difficult to even get our kids to sleep. Furthermore, the availability of amplification has resulted in and almost certainly will continue to result in its abuse, and there are so many alternative means for guests to supply their own

amplification that the only reasonable way to control this is to completely outlaw amplification at this site. We also want to make sure that non-amplified instruments that can still produce excessive volume (such as drums, bagpipes, brass instruments, etc) are also explicitly outlawed.

Furthermore, we do not support a zoning change which includes a hotel as a permitted use due to concerns with further noise issues, light pollution, increased traffic, and the increased potential for trespass onto our property.

Our suggestion would be to hold off on any approval of a permanent zoning change until River Bend can demonstrate an operating model that works within our mostly residential neighborhood. The letter we received states that the Town Administrator has committed to extending River Bend's temporary use permit through 2017. This seems like plenty of time for River Bend to actively resolve the noise issue to everyone's satisfaction, and it forces them to be accountable or face continued delays in obtaining permanent zoning. We are asking you to please work with the residents of the neighborhood to develop a solution that works for everyone. Thank you!

Sincerely,

Patrick M. Thomas and Clara P. Thomas

## Deb Anthony

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**From:** Bob Joseph [rjoseph@estesvalley.net]  
**Sent:** Tuesday, March 08, 2016 4:27 PM  
**To:** 'Pat Thomas'; Deb Anthony  
**Cc:** Victoria Simonsen; John O'Brien  
**Subject:** RE: River Bend 2016 Zoning Change  
**Attachments:** 501 & 503 W Main - England Survey 07-30-08.pdf; Legal Description - 030316.pdf; Photos - 030316.pdf; Request & Rationale - 030316.pdf; Sht-A00 - Cover Sheet - 030316.pdf; Sht-A01 - Zoning Amendment Map - 030316.pdf; Sht-A02 - Site Plan - 030316.pdf; Written Statement - 031316.pdf

Hi Pat,

I will do my best to answer your questions (see below).

You asked:

1. Would the new zoning be C- Commercial or PUD-C? I'm confused by the notification letter, which mentions both. How do these 2 designations fit together? Is the PUD-C meant to be a subset of permitted uses allowed under C? This letter does not explicitly state what subset of permitted uses are intended by this change as far as I can tell.

Staff response: The new zoning would be PUD-C, but as such it relates to some degree to the C-Commercial zone standards, but is not bounded by those uses and standards since the PCDC and BOT is empowered to add to or delete uses from the C-Commercial list, and vary the dimensional standards. I think the key information to pass along to you is that as a PUD, the approved uses are limited to those uses specifically requested and approved under the PUD. It does not carry any right beyond that into the broader C-Commercial list of uses. In this case the PUD is a fairly narrow sub-set of C-Commercial uses along with the Lodging/Hotel use and Campground use that is otherwise not permitted in the C district.

2. Can I get a copy of the actual application along with all town staff review documents?

Staff response: I have attached PDF's of the updated submittal and you can also obtain hard copies of any of these documents and all other documents of record from the Town Clerk.

3. Has town staff determined any specifics as to how noise will be controlled? I see mention of outdoor live music limited to non-amplified instruments, but then the very next bullet opens the door to amplified background music, vocals, and PA system. These are the very issues that defeated the previous zoning change and, if I read this literally, they could go right back to the awful DJ music that has now ruined 2 summers' worth of weekend evenings for me, my neighbors, and my family so far.

Staff response: Town staff will make recommendations regarding this in the Preliminary PUD staff report that will be prepared later this week. The PCDC can adopt or modify the staff's recommendations as they make their recommendations for the BOT to consider. Ultimately, the final conditions are a product of BOT deliberation and action with advice from staff and PCDC after taking testimony in a Public Hearing. As I understand the limitations proposed by the applicant's the use of the PA to amplify DJ music is not intended and would not be allowed. Staff will clarify that in the final record, so thanks for pointing this out.

4. How would the town insure that the indoor Pavilion venue (if constructed) is actually constructed in such a way that it will effectively contain amplified music?

Staff response: The Pavilion would be subject at some future date to full review by staff and the PCDC with ratification by the BOT. The ability of the proposed structure to contain sounds would be evaluated carefully at that time. Such a review might entail reports and analysis from qualified professionals for PCDC review prior to final action on a Pavilion.

5. Based on what I see here, it appears that they are no longer requesting a zoning change for 503 and 517 W Main parcels. Is this correct?

Staff response: That is correct. Those properties are not part of the PUD and so they will remain zoned R2.

Thanks for your questions and input.

-Bob Joseph ASLA/AICP

Planner

Town of Lyons

**From:** Pat Thomas [mailto:pthomas976@gmail.com]

**Sent:** Tuesday, March 8, 2016 2:54 PM

**To:** Bob Joseph <rjoseph@estesvalley.net>; Deb Anthony <danthony@townoflyons.com>

**Cc:** Victoria Simonsen <vsimonsen@townoflyons.com>; John O'Brien <jobrien@townoflyons.com>

**Subject:** River Bend 2016 Zoning Change

Hi Bob and Deb,

I received the neighbor notification regarding River Bend's latest application for a zoning change. I have a few questions:

1. Would the new zoning be C- Commercial or PUD-C? I'm confused by the notification letter, which mentions both. How do these 2 designations fit together? Is the PUD-C meant to be a subset of permitted uses allowed under C? This letter does not explicitly state what subset of permitted uses are intended by this change as far as I can tell.
2. Can I get a copy of the actual application along with all town staff review documents?
3. Has town staff determined any specifics as to how noise will be controlled? I see mention of outdoor live music limited to non-amplified instruments, but then the very next bullet opens the door to amplified background music, vocals, and PA system. These are the very issues that defeated the previous zoning change and, if I read this literally, they could go right back to the awful DJ music that has now ruined 2 summers' worth of weekend evenings for me, my neighbors, and my family so far.
4. How would the town insure that the indoor Pavilion venue (if constructed) is actually constructed in such a way that it will effectively contain amplified music?
5. Based on what I see here, it appears that they are no longer requesting a zoning change for 503 and 517 W Main parcels. Is this correct?

Thanks in advance for your feedback on these questions.

Regards,

-Pat Thomas

Edward Arling  
601 ½ Indian Lookout Rd  
PO Box 1536  
Lyons, CO 80540

March 9, 2015

Lyons Planning and Community Development Commission (PCDC), Lyons Board of Trustees (BOT), Lyons Town Staff, Lyons Mayor John O'Brien  
432 5<sup>th</sup> Ave  
PO Box 49  
Lyons, CO 80540

Subject: Objection to River Bend Permanent Zoning

Dear PCDC, BOT, Town Staff, and Mayor O'Brien:

Thank you for the opportunity to once again express our concerns regarding the proposed zoning change proposal submitted on behalf of the River Bend venue and its parent company, My neighbors and myself went through this process and documented our concerns and presented them to the BOT and Mayor last summer, when the original zoning change was applied for by Lyons Properties, LLC. We appreciate the minimal progress River Bend has promised to be made in regards to its noise since it opened, but we are asking them to be held accountable to their promise to be good neighbors and demonstrate they can and will eliminate the ongoing obnoxious noise emanating from their facility before they are granted any permanent zoning change or granted the current PUD approval.

Our concerns regarding the development of this property primarily are focused on the continuing noise issue we have experienced for the past two summer event season, including nights and weekends filled with amplified music, amplified PA systems and loud vocal celebrations. For over 30 years, the property was residential, and surrounded by quiet, respectful residential neighbors, and now we have experienced two full years of noise and racket that is disruptive to the residents of the surrounding neighborhoods and broken promises from the owners to get the noise nuisance eliminated. The facility is located in a canyon that amplifies and echos sound far beyond a normal setting would under the same sound levels. The sound is actually louder the farther one gets away from the event center.

We have tried to work with all parties involved to come to a solution that works for everyone, including the event owners, neighbors and Town. Last summer on September 5 we met with the owners of the event center personally to discuss the lack of control of sound and lack of response from their onsite managers. We were told that if we have a problem with sound to call the Sheriff. The very next event held was so loud, and there was no response from their manager when called, that I did have to call the Sheriff. Calling the Sheriff is not a sustainable solution to loud amplified noise. On their season closing event, held on October 11, 2015, the noise was so loud that even with my doors and windows closed; I could hear the noise inside my home.

The solution is to eliminate the noise or adequately contain it to avoid disturbing neighbors. Until the owners of this event center can take the ethical and practical steps to run their business without disruption to neighbors and residents, they should not be granted any request for zoning or PUD changes/approval.

The latest PUD proposal address some of our concerns however **there has still been no resolution to the noise issue**. Extremely loud, amplified events were still taking place in Oct. 2015, after the owners promised cessation. We recognize the contribution of the event center to the Town commerce; however, until the noise nuisance has been proven to be abated, we cannot support any permanent zoning change.

Furthermore, the current proposal contains a commitment by River Bend to limit live entertainment to non-amplified instruments; however, the very next bullet allows for **amplified background music, vocals, and PA system**. It has the usual verbiage regarding minimum sound levels and eliminating sounds found to be objectionable by the Town Administrator, but these are the same assurances we received last summer that were not effective and continue to aggravate the situation between neighbors, the event owners and the Town. This language leaves the door open for more obnoxious noise pollution from an event center where even the owners live far enough away not to have to tolerate it.

The fact is that any and all amplification used at River Bend can and will be heard throughout the area due to the Canyon wall setting acting as a natural amplification system. At one point the event center owners promised to only have acoustic instruments, but then they amplified those acoustic instruments through a loud PA system. How are we to trust getting the noise issue resolved with this type of behavior?

I have also noted Town advertisement promoting the event center and using the event center for Town sponsored events. I find this to be a conflict of interest when the Town knows that the event center is causing a noise nuisance. How can the Town and its representatives act as a neutral party in this ongoing issue when the Town is supporting and promoting the event center?

Furthermore, we do not support a zoning change which includes a hotel as a permitted use due to concerns with further noise issues, light pollution, increased traffic, and the increased potential for trespass onto our property.

We respectfully oppose any approval of a permanent zoning change until River Bend can demonstrate an operating model that works within our mostly residential neighborhood. The Town Administrator has committed to extending River Bend's temporary use permit through 2017, which is ample time for River Bend to make good on the promise they made two years ago to abate the noise issue. We are asking you to please work with the residents of the neighborhood to develop a solution that works for everyone. Thank you!

Sincerely,

Edward R. Arling and Ann M. Arling

Hello Betsy. I appreciate your memory on what was mentioned about an ordinance review. I'm not sure on the process.

Debbie, can you please provide us any information on the next step or who we can work with.

Just to say, I'm anxious to see how the new season works out for Riverbend as a whole. I'm really keeping fingers crossed. For myself, I do recognize the work of the Riverbend group to move to a non-amplified venue. I'm hoping it's a win-win for everyone. As I connect the dots in my mind, it makes sense to me to review the permitting after this upcoming season's test.

I cannot speak to the sound ordinance and how your changes fit into a town wide change. But, I do believe it's past-due for the town as a whole. An overall review seems timely as the dust and projects around Town maybe start to settle.

Thanks,  
Steve

Hi Steve,

We agree that Lyons needs a town noise ordinance. As we remember it, Mayor O'Brien said that he would like to enact a new town noise ordinance. Not sure where he and the BOT are with it at this point. We feel that River Bend has already gone above whatever the new ordinance may be since we will be an acoustic only venue starting this year. It's also our understanding that the Town parks are not required to comply with a town noise ordinance. We would like to see the new ordinance include all properties – not just privately owned properties.

Thank you,  
Betsy and Mike

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[Betsy Burton](#)  
[LyonsFarmette.com](#)  
[303.746.6266](#)



On Mar 9, 2016, at 12:14 PM, Steve <[steve@on-site.biz](mailto:steve@on-site.biz)> wrote:

Hello.. Just to touch base on one of the BOT meetings this last winter related to a sound ordinance. There was mention during the meeting of having the town attorney research ordinances from around the State of Co. I was thinking that the BOT/Mayor was thinking this would be a starting point for the town to update its sound ordinance. Do you know of any progress on this? Is there anything citizens need to do to help out with this? Not to be a pain but more-so to make sure something did not get missed (as you all work through the multitude of projects!) . It may be helpful for the town as a whole

Thanks Again,  
Steve Simms  
303-823-5753

Dear PCDC, BOT, Town Staff, and Mayor O'Brien: Just a reminder to trustees, zoning for Riverbend has been discussed in many prior meetings. Items are still pending that should preempt a final permanent zoning change. Collaboration between Riverbend and neighbors adjacent to these venues has been amenable and productive. Efforts with time and financial resources have been put in by all. The constant threads of emails and conversations and on-site visits are a testament to everyone's efforts. Yet, the situation is still a work in progress. With a new season starting, it seems prudent to see how the suggested changes in amplified/acoustic sound and music venues pans out. Having operated under temporary zoning for multiple years, permanent zoning changes seem too early to grant.

At this time, permanent zoning seems to be putting the cart before the horse. It was a bit disconcerting to see a large email blast across the Town of Lyons residences looking for support for the Riverbend venue. It looked to be somewhat from the Town and was calling for input to be emailed Debbie Anthony at the Town. It was under the auspices that the Riverbend venue is good for everyone. To gather non-bias input, the email blast should have had some mention of acoustic levels.

I encourage the BOT to review prior documents and statements submitted from prior Town meetings.

Thanks,  
Steve Simms  
303-823-5753  
[steve@on-site.biz](mailto:steve@on-site.biz)

Thanks,  
Steve

Hello.. Just to touch base on one of the BOT meetings this last winter related to a sound ordinance. There was mention during the meeting of having the town attorney research ordinances from around the State of Co. I was thinking that the BOT/Mayor was thinking this would be a starting point for the town to update its sound ordinance. Do you know of any progress on this? Is there anything citizens need to do to help out with this? Not to be a pain but more-so to make sure something did not get missed (as you all work through the multitude of projects!) . It may be helpful for the town as a whole

Thanks Again,  
Steve Simms  
303-823-5753

Please, be advised that I wish to have my former objection documents of 2015 to be resubmitted for the hearing on March 14, 2016 regarding the future plans at River Bend for rezoning and PUD. I would appreciate your assistance with this Deb.

I have been called out of state for the funeral service of my eldest sister, therefore I will be unable to attend or prepare new documentations. From the information that I received, yesterday, in the certified letter from The Town of Lyons, I witness no improvements to my satisfaction of the issues we addressed during the former applications submitted by Lyons Properties, LLC last year.

Upon my return from Arkansas I will give this matter my full attention and attempt to address this "new" application for the hearings in April and May. Thanks for your indulgence and consideration.

Darlene L. Thompson  
513 West Main Street, property owner  
Lyons, Colorado 80540-0055

Thanks for allowing the Neighbors of River Bend to attend this Public Hearing re: special use and zoning changes for 501, 503, & 517 West Main Street, Lyons Co.

**Please, honorable Mayor, John O'Brien; Lyons Board of Trustees' Planner, Bob Joseph and Planning Commission Members, assure me that you will represent and protect all of the citizens of Lyons, not just the select few naming themselves the Lyons Properties, LLC.**

Please, provide the Planning and Community Development Commission recommendations and those results.

Please, provide the Impact Study regarding: Safety -Crime Control-Drug and Alcohol Use-Child Protection-Animal Safety/Noise control and Interference with residents daily lives, water, sewer, electric and Fire Protection; sporting events, customary for Lyons citizens, such as: softball, fishing, boating, tubing, rafting - **Town of Lyons- Boulder County Sheriff; Traffic Control, pedestrians and vehicle- Colorado Department of Transportation.** This list may not be all inclusive of issues needing to be addressed.

ATTACHED: by Darlene L. Thompson, owner at 511/513 West Main Street, Lyons, Co.

**My Goals: My History: and My Dream:**

Presently, I will review my goals and my dream with you and will let you review the elongated, **My History** section at your own choosing.

**My Goals:** I do NOT want to attend the funeral of any more of our beloved Lyons Area Heroes or Heroines, nor do I want the deaths of 700 festival attendees on Our (Lyons) hands due to the lack of CARE, PROTECTION, AND SAFETY without, "common sense and logic" in the preliminary Impact Study and/or Planning. **"Fore warned is Fore armed" . . we must be READY for any catastrophic occurrence, whether it is an act of God or Mother Nature or an act of HUMAN ERROR.**

**My Dream:** I want to live out my days in calm and peace with my doggie, my family and my friends near by! I do NOT see that dream in my future with the documents that I received on June 5th by Registered Mail from the Town of Lyons, #7014-2120-0000-6380-3913 regarding: NEIGHBOR NOTIFICATION: ORDINANCE 949, TEMPORARY USES AND STRUCTURES AT RIVERBEND and NEIGHBOR NOTIFICATION: ZONING AMENDMENT & USE by SPECIAL REVIEW APPLICATION AT RIVERBEND.

*For the record: My good neighbor contacted me three times after I had informed him that I was NOT discussing the sale of my property until after the one year anniversary of my husband's death. I finally, wrote him a letter to advise and inform him to contact my realtor. Speaking of my late husband . .he and both of my parents and my youngest son, would flip over in their graves up there at the Lyons Cemetery if, they knew what was coming down the Pike and/or River if, you will, by my neighbor and partners at LYONS PROPERTIES, LLC.*

*Questions or notes in PINK on the document received from the Town of Lyons.*

**My History:** Great grandparents, the Birdsalls owned what is now Shady Lane; Great grandparents, Arthur Trevarton owned property in Hygiene, Altona and Ward; grandfather, Otis Andrew owned 1000 acres in Allenspark where my Mother and her four brothers attended Bunce School through the 8th grade and then to Lyons when her Dad drove her to school every day down the South Saint Vrain. I and four of my five children all graduated from Lyons High School. We (my husband, James and I) have owned property in Lyons since 1968. A total of 47 years at 206 Park Street and/or 511-513 West Main Street which is zoned "Commercial." My husband served on the Lyons Parks and Recreation and Planning Commissions and was a Town Council Board Member. Additionally, we rented a mobile home space in Lyons for 3 more years, giving me fifty years in Lyons as an adult and another year as a child attending school in the Old Museum School Building when I was a fourth grader.

My parents, Willard and Leona Trevarton owned all of the land from Hwy 36 to the St Vrain River, including my current property and that of 517 West Main, now owned by Mike Whipp. The property was residential and farming, they ran cattle, irrigated the pasture, grapes, orchard and garden. They sold the back half to Don Fidler and my parents built the new house, using Lyons Red sandstone and Buff sandstone from Masonville. Dad was working for Sterling Stone Quarry at the time and my mother was a postal clerk at the Main Street Post Office and then they moved into the new Post Office in the Loukenon Building next to Rogers Hall.

The friends and neighbors who "lent a helping hand" to my parents were amazing during the construction of their new home, the home that I now own. Slim Gereaux, Bill Bracket, Sherm Bohn, David Orback, Albert and David Goranson, Clair Billings, Gene McAllister, Lorne Beck and even my husband sporting his full length leg cast - sitting on his fanny and dragging that cast across the floor as he nailed down sub-flooring.

My employment in the Lyons area included: Foothills Restaurant, Lyons High School, Valley Bank, Indian Valley Company, Hygiene Elementary, Seven T's Construction as the Corporate Secretary-Treasurer, Baseline-Mocon Industries and Lionscrest Manor.

I volunteered as PTO President, Treasurer of Lyons Cemetery, Member of the Lyons Parks and Recreation Board, Sunday School teacher, Blue Birds Leader, Cub Scout Den Mother, Volunteer of America, Advisory Board of Salvation Army, coach for men's and girl's softball teams and an avid women's softball player, second base traditionally. I was also an avid advocate to "keep our schools in Lyons," campaigning for School Board Members, Dr. McKenna, Wade Carlson and Henri Kinson.

My greatest feat was supporting and backing my husband of 56 years, raising my five children, and welcoming 13 grandchildren and 7 great-grandchildren into our Thompson Family. I believe that I had to have "common sense" and "logic," to meet these challenges.

**I love Lyons and I will do everything I can to protect "her." Sorry, fellas Lyons is A BIG GIRL TO ME!**

Thompson Family Trust  
Darlene Thompson  
513 W. Main St.  
PO Box 55  
Lyons, CO 80540

August 4<sup>th</sup>, 2015

Lyons Properties LLC  
501W. Main St  
c/o 4121 Ute Hwy  
Lyons, CO 80540

Dear Riverbend, Associates and Guests,

This letter is to inform you that our fence was cut and criminal trespass did occur at my residence located at 513 W. Main St. The historical fence, placed by my father Willard Trevarton (circa 1963), was broken and trampled on the date of July 26th, 2015. We have eyewitnesses to the trespass of persons moving from the Riverbend property onto ours and across our property to the Rockygrass Festival at Planet Bluegrass. This fence is adjoining your property at 501 W. Main St. Upon receipt of this letter, if you, your guests, or associates come onto my property they will be in violation of Lyons Municipal Code of criminal trespass.

On the date of July 26th, 2015 we filed a complaint with the Boulder County Sheriff (case number 15-4180) written by Officer Gary Robinson (badge number 566).

This letter further serves as notice that we will be placing motion cameras to collect evidence of trespass, have repaired said fence, and will do everything to protect our property and our peaceful enjoyment of said property.

We consider it your legal and fiduciary responsibility to prevent any further trespass from your property onto our property.

We will pursue this issue further should any additional trespass, disturbance of our right to peaceful enjoyment, or damage to our property occur. We are requesting all trespass to cease and desist before formal litigation is filed. Please contact our attorney Richard Johnson of Johnson and Repucci of Boulder.



cc:

Lyons Town Board  
Planet Blue Grass  
Richard Johnson esq