

# Comanche Creek Ranch Owners Association Road Maintenance Strategic Plan

6 September 2019



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## Plan Revision History

17 July 2013 Initial Publication Version 1 (Ver 1)

15 Jan 2014 Revision 1 minor revisions / additions for clarity based on member comments, added summary of plan paragraph, and updated with 2013 actual budget (Ver1, Rev1)

9 Mar 2015 Revision 2, updated with 2014 actual budget, added paragraphs on authority to maintain roads and Review of 2014 actions, changed plan for 2015 (Ver1, Rev 2)

6 Sept 2019 Rewrote Plan for 2019 – 2021 Planning Time Frame Initial Publication Version 2 (Ver2)

## Introduction

"Wow, how did you ever find this place?" is often the very first things visitors to Comanche Creek say. This community is very special, and key to lifestyles out here are the roads. The purpose of this plan is to provide guidance for the current Comanche Creek Ranch Owners Association (CCROA) board of directors and members on the CCROA roads. The plan is written for the members, and the CCROA board actively seeks the members' comments. The board should update this plan yearly and it will provide an institutional memory for matters concerning the roads, and a basis for future road work. This plan is the CCROA policy for road maintenance. This is not the first plan. There was a similar effort in 2004 where members formed a "road committee" to establish a budget and near and far term goals. Those are discussed later. The Version History gives an idea of how the plan has evolved over the years.

## Background

This part of the plan begins with a description of the CCROA roads, to include a brief history of how they were established. Following that description, the plan presents a history of road maintenance actions so members can gain awareness of work done in the past and the fiscal constraints on this plan.

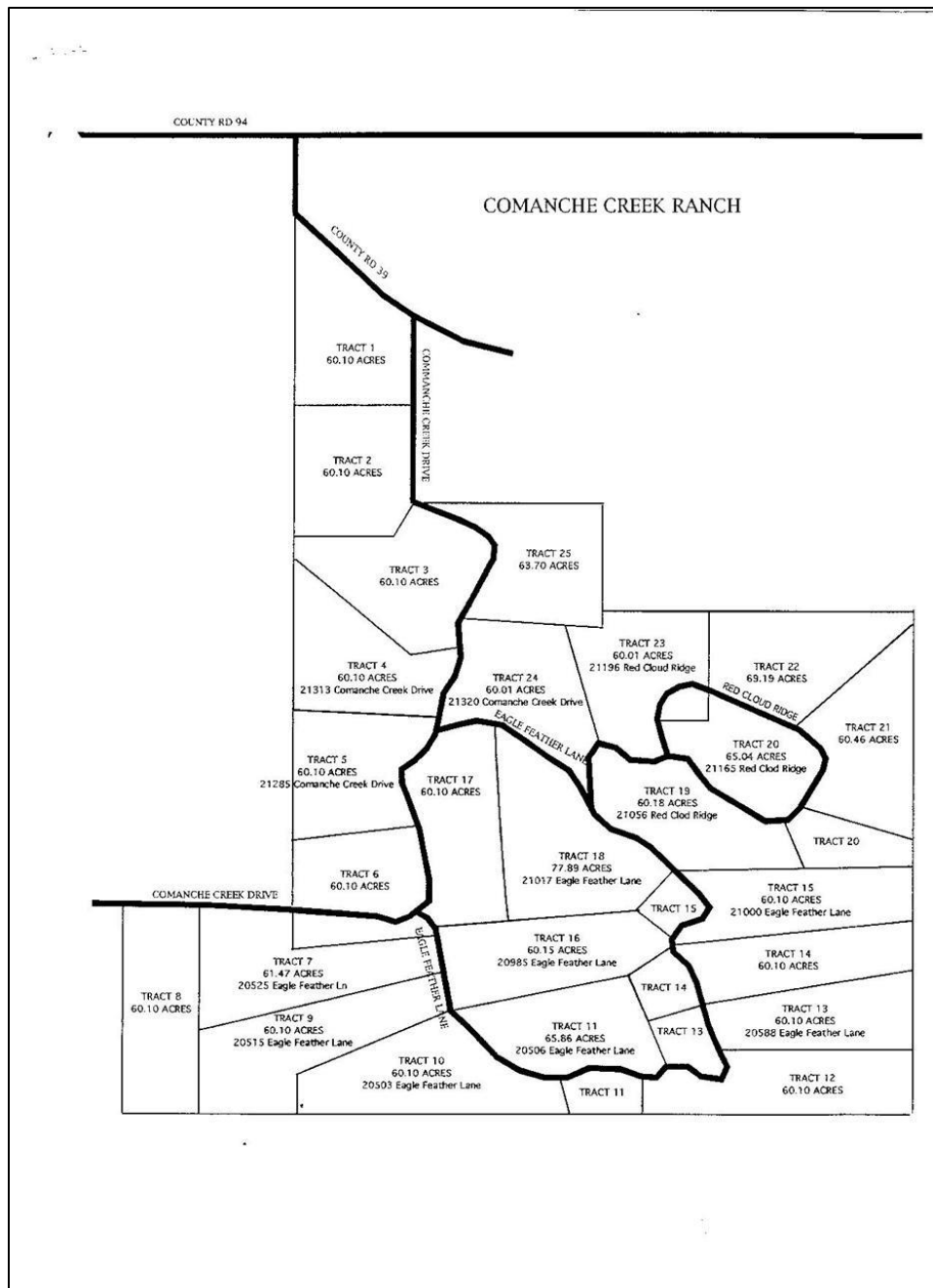
## CCROA Roads Description

As members are aware, CCROA is a planned community and was established in 1995. From the Declaration the roads are leased in perpetuity to the Association:

1.03 Common Elements mean the easements for ingress, egress, utilities, drainage, pedestrian and equestrian uses, as shown on the Plat, leased in perpetuity to the Association; which, however, do not include the ten (10) foot and twenty (20) foot equestrian and trail easements shown on the Plat.

The Plat as recorded with Elbert County is below in Figure 1 CCROA Roads from the Declaration. The Declaration also provides for the CCROA to collect assessments and use that money for road maintenance.

2. "Association" means the COMANCHE CREEK RANCH PLANNED COMMUNITY UNIT OWNERS ASSOCIATION, INC., the nonprofit corporation organized pursuant to the Articles formed as required by the Declaration to govern the property therein described through its owners, who, as defined, are members of the Association, and their owner-member elected representatives, specifically, to administer, maintain and repair the common elements of the property subject to this Declaration, administer and enforce the covenants set forth in the Declaration, collect, disburse, and account for the assessments and charges levied upon Association owners and members, with all purposes and powers incident thereto.



**Figure 1 CCROA Roads from the Declaration**

There are roughly 6.2 miles of CCROA Roads with an easement of 60 feet, 30 feet on each side from the center of the road. CCROA has two entrances, one on the North onto County Road 39 and the other to the West onto county Road 37. The roads are maintained by the Association, hence the signs posted at each entrance, "Not a County Maintained Road". The developer established the roads. The roads were not engineered, that is there is no record of specifications or standards of construction. The road base came from a nearby pit, and contains considerable amounts of clay, which allows for good compaction, but results in very slippery roads and rutting when wet. There are cattle guards at the entrances, and a

cattle guard at the western intersection of Comanche Creek Drive and Eagle Feather Lane. There are four concrete crossings in low areas where water flows over the road, and one concrete crossing over a culvert, where water over tops the crossing during the infrequent heaviest rains.

There are a number of culverts in various places. The figure below shows the locations of various crossings and culverts.



**Figure 2 CCROA Culverts, crossings, and cattle guards**

In addition to the roads, there are community signs at each entrance, speed limit signs, and equestrian community signs. There are reflective road markers at most culverts and concrete crossings. Elbert County maintains the street signs, property addresses, and the “Not a County Maintained Road” signs at each entrance. These roads currently serve 20 full time residences with a population of approximately 45. Regular activities on the roads come from residents and others such as waste removal every Friday,

USPS every day, and various infrequent deliveries (i.e. FedEx, UPS, Propane). Although increasing, in general, there is not a lot of traffic.

### **The Local Improvement District**

In October of 2001, members explored what it would take to have Elbert County take over road maintenance to include snow plowing, road grading, and repairs as necessary. The initial plan was to get a bond issued that would be close to our assessment, and have the county take care of things, relieving the CCROA from road maintenance responsibilities. Elbert County Road and Bridge Department came out and inspected the roads. Roadway improvements to bring the roads up to county standards involved sub-grade preparation, drainage improvements, shouldering with aggregate base courses, and placement and preparation of road base. The county engineer then obtained bids from several road construction companies to develop a cost for the project. The total cost was \$585,000, \$23,400 per lot. Depending on a bond interest rate of 7% or 9.5% the yearly cost per lot over a 20 year period was between \$2172 to \$2616. As a consequence of this cost members voted down the issuance of a bond.

### **The Lawsuit**

In August of 2003 several CCROA members sued the developer over the status of the roads. This case is *Stan Ross et. al v. Co-Ka-Ne Consultants, Inc et. al.* The case is relevant to this plan as it concerned whether or not the roads are to be maintained by Elbert County and the developer's responsibility for that. The consequence was the plaintiffs were awarded damages from the developer as the roads had been advertised as "will be county maintained", during the sales of the properties. This judgment effectively ended all discussion of the developer improving the roads to the point where the county would "take them over", and also ended the developer's participation with Comanche Creek.

### **History of Road Maintenance**

The history of CCROA road maintenance is best told by examining the road expenditures and road budgets. The association began collecting assessments in 2001. Figure 3 History of Road Maintenance Expenditures below is the history of expenditures from when the CCROA board was established and began functioning. Prior to that the developer maintained the roads.

Year	Snow Removal	Weed Control / Mowing	Grading	Road Base Improvements	Emergency Repair	Total
2001						\$ -
2002	\$ 595.00	\$ 600.00	\$ 2,100.00	\$ 45.60	\$ -	\$ 3,340.60
2003	\$ 1,510.00	\$ 1,443.04	\$ 1,452.50	\$ 1,260.16	\$ -	\$ 5,665.70
2004	\$ 505.00	\$ 1,404.62	\$ 2,160.00	\$ -	\$ -	\$ 4,069.62
2005	\$ 1,678.50	\$ 2,290.00	\$ 3,502.50	\$ 2,955.47	\$ -	\$ 10,426.47
2006	\$ 1,030.00	\$ 3,396.25	\$ 1,375.00	\$ -	\$ -	\$ 5,801.25
2007	\$ 8,517.50	\$ 2,306.25	\$ 3,990.00	\$ -	\$ -	\$ 14,813.75
2008	\$ 2,885.16	\$ 2,155.00	\$ 980.00	\$ -	\$ -	\$ 6,020.16
2009	\$ 2,200.00	\$ 3,210.00	\$ 1,540.00	\$ 25,275.25	\$ -	\$ 32,225.25
2010	\$ 552.50	\$ 3,018.75	\$ 2,092.50	\$ -	\$ -	\$ 5,663.75
2011	\$ 945.33	\$ 3,212.50	\$ 1,052.50	\$ -	\$ 3,250.00	\$ 8,460.33
2012	\$ 1,602.50	\$ 930.00	\$ 4,951.25	\$ -	\$ -	\$ 7,483.75
2013	\$ 2,780.00	\$ 1,080.00	\$ 3,900.00	\$ 12,000.00	\$ -	\$ 19,760.00
2014	\$ 800.00	\$ 1,000.00	\$ 4,477.50	\$ 12,000.00	\$ 300.00	\$ 18,577.50
2015	\$ 3,975.00	\$ 160.00	\$ 1,757.50	\$ 12,720.00		\$ 18,612.50
2016	\$ 2,200.00	\$ 80.00	\$ 2,005.00	\$ 1,000.00	\$ -	\$ 5,285.00
2017	\$ -	\$ -	\$ -	\$ 7,005.00	\$ 616.12	\$ 7,621.12
2018	\$ -	\$ -	\$ -	\$ 5,750.00	\$ -	\$ 5,750.00
2019	\$ 203.95	\$ 40.00	\$ -	\$ -	\$ 703.95	\$ 947.90
	\$ 31,980.44	\$ 26,326.41	\$ 37,336.25	\$ 80,011.48	\$ 4,870.07	\$ 180,524.65
History of Road Maintenance as of 7/25/19						

Figure 3 History of Road Maintenance Expenditures

Figure 3 is as of 25 July 2019. Analysis of the numbers reveals excluding 2001 and 2019, on average the Association has spent about 81% of its annual budget on road maintenance.<sup>1</sup> In 2009 the association made major improvements to the north entrance hill, the southern part of Eagle Feather Lane, and Comanche Creek Drive around the northern intersection of it and Eagle Feather Lane. These improvements have held up in general, except for the hill on the northern entrance. The emergency repairs were for the concrete crossing over the culvert on Eagle Feather Lane. During a 2011 rainstorm the water overtopped the structure and washed the boulders and embankment down the creek, threatening to wash the entire structure out. In 2012 considerable effort was put on the west entrance. The overall frequency of road maintenance is often driven by weather conditions. Figure 4 below shows the frequency for 2012 through 2014 with the bulk of the data from invoices.

	Year								Grand Total
	2012	2013	2014	2015	2016	2017	2018	2019	
Grading	5	3	5	4	2	3	5	1	28
Mowing	3	2	2	1	2	1		2	13
Repair			1		1	1		2	5
Road Base Improvements	1	1	1	2	2	3	1		11
Snow	1	5	3	6	4	2	1	2	24
Grand Total	10	11	12	13	11	10	7	7	81
Numbers of Maintenance Actions by Year									

Figure 4 Frequency of Maintenance Action

<sup>1</sup> The Association refunded the second half assessment to members in 2005, 2006, 2008, and 2010 reducing the income to \$7500 those years. CCROA increased assessments to \$16500 effective 2018.



Typically, snow removal activities occur in the winter and Feb/Mar, mowing in June/July and grading is interspersed, about every couple of months during the summer/fall. One key aspect of the last couple of years is the dry weather prevents effective road grading

### Historical Summary

From the outset, CCROA roads were beset with issues associated with the original construction. Improvements to bring them up to county standard were estimated to be well over \$500,000. These improvements are in sub-grade preparation, drainage improvements, shouldering with aggregate base courses, and placement and preparation of road base. CCROA has spent approximately \$180,000 on the roads over the last 18 years. This plan will cover aspects of road maintenance in the next major section "CCROA Road Maintenance Plan".

## CCROA Road Maintenance Plan

This plan spans 2019 to 2021, a three-year period, and is now in its first year. Recognizing the association currently has a maximum annual budget of \$16,500 generated entirely from members' assessments, this plan lays out a short and long term plan to effectively apply those resources to the CCROA roads. This plan intends to solve the problem of "How to best maintain the roads?" Road maintenance requirements can be divided into snow removal, mowing, road grading, road improvements, and road repair. Within each of these areas, there exist minimum standards to be met, and standards which would meet any reasonable expectation. The two main challenges to overcome are finding companies to do the work, and keeping within the allowable budget.

### Snow Removal

Comanche Creek is one of the most beautiful places to live, and its beauty is enhanced by our remote location. The advantages of remoteness such as solitude, also come with the fact that Comanche Creek "is too far away" for some people to live, or provide services first thing in the morning. The association makes every reasonable attempt to have the roads open in the morning, but weather conditions and other factors outside of the Association's control often preclude this. During periods of heavy blowing snow, it is common for Hwy 86 to become impassable, as well as county roads near Comanche Creek. Typically, deep drifts start to occur when the winds are greater than 20 mph and the west entrance is often the first place to become impassable to most vehicles<sup>2</sup>. The north entrance is the most reliable in various weather conditions. During snow events communication between members on the conditions of the roads is encouraged and the board will let members know when the roads can be expected to be cleared. Snow removal standards are defined in the Snow Removal Policy adopted in 2004. This policy is in Appendix A, Snow Removal Policy. All snow removal work should be performed by insured contractors with a tax identification number (TIN) for 1099's. One problem to guard against in snow removal operations is taking the crown off the road, or putting too much material into the ditches. The roads should be cleared shoulder to shoulder so melting snow does not flow in the road and create ruts. Snow removal is the most unpredictable part of the Road Maintenance Budget. The CCROA Board of Directors (BOD) should consider institutionalizing the practice of taking any unspent budget in April, and apply that to the other categories of road maintenance.

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<sup>2</sup> CCROA members can expect to be snowed in for 2-3 days per year as part of the entire county being snowed in. [https://www.elbertcounty-co.gov/news\\_detail\\_T28\\_R68.php](https://www.elbertcounty-co.gov/news_detail_T28_R68.php) is the link to sign up for CODERED warning on Elbert County road closures.

## Mowing

Mowing has two major benefits as it is one of the keys to a good gravel road, and it controls the weeds.<sup>3</sup> Generally the first mowing should be done in June before the weeds get too tall and go to seed. Some property owners mow their own easements and that is encouraged. When possible, mowing should be done ahead of shoulder operations on the road because mowing reduces the amount of vegetation pulled up into the road. The standard for CCROA mowing is at least once in the spring. Mowing equipment should be able to get at 10 feet into the easements where possible. In practice that translates into a couple of passes on each side of the road with a 60 inch rotary mower most mowers have on their tractors.

## Road Grading

The main purpose for road grading is to keep the crown on the road, and to take out the washboard that regularly sets up. The washboard is the number one source of complaints about the CCROA roads, and gravel roads in general.<sup>4</sup> The three causes of washboarding are lack of moisture, driving habits and poor quality of gravel. It is highly unlikely we will be able to influence CCROA member driving habits and the weather. The gradation of gravel can be modified by scarifying, pulling more fines from shoulders, etc. But the key is to get a high quality surface gravel in place in washboarding areas. With heavy traffic in prolonged dry periods, even good surface gravel will not guarantee elimination of washboarding. However, it definitely will reduce it. The standard for CCROA road grading should be 1 to 2 road grading events for maintenance, timed to effectively deal with the inevitable washboarding, and road improvement activities.

## Road Improvements

Road improvements are undertaken to re-crown roads and bring in good road base. The initial road base for much of CCROA roads is sub-standard and contained too much clay. The minimum standard for CCROA road improvement activities is one event per year. In 2004 the Road Committee developed the following goals for road maintenance:

Near term goals (1-3 years)									
1	Identify contractors/costs for road repairs road grading, road base, and larger gravel.								
2	Repair road conditions where roads are the worst road base and larger gravel in trouble areas.								
3	Place signs "Crossing while water is present is forbidden" at Texas crossing between the Johnson and the Akerberg properties								
4	Identification of snow fencing in areas where snow fall is the worst.								
5	Identification of areas where weeds are the worst.								
6	Spray for weed and grass control (Twice yearly Early Spring and Early Fall)								
7	Drag roads on entire tract (twice yearly Spring and Fall)								
8	Establish a road maintenance rollover account								
Long term goals (3-5 years)									
1	Place new road base on all roads.								
2	Locate snow fencing at all areas that have potential of closing roads.								
3	Remove cattle crossing at the top of the Comanche Creek and Eagle Feather Y .								
4	Determine a plan for spraying for thistle and the grass that is encroaching onto our roads.								

Figure 5 2004 Road Goals

Beginning with the original Goals in Figure 5 above, the association has a way of measuring the effectiveness of them and progress in our plan. Since then (2004) the association abandoned the idea of

<sup>3</sup> Gravel Road Maintenance and Design, US DOT, FHA, Nov 2000, page 17

<sup>4</sup> See [www.t2.unr.edu/StreetWise/streetwiseSum02-V11-01.pdf](http://www.t2.unr.edu/StreetWise/streetwiseSum02-V11-01.pdf).

spraying to reduce the thistle as experience with spraying showed it that was less effective than mowing. In 2009 three trouble areas were addressed:

- the hill just south east of the Johnson's
- the Hill between the Sinel's and the Skowronek's
- the main north entrance hill

Each of these areas were "ok" in 2013 with the exception of the main north entrance hill. (From that we can expect the average life of an improvement can be about 4-5 years, depending on traffic.) The association abandoned the idea of snow fencing, primarily because of the need to put it up and take it down on property for each season. The practice of establishing a roll over account was implicitly established, although not explicitly stated by revising the bylaws. There is a backlog of pent up demand for bringing in new road base, however, beginning in 2013 the board decided to focus on the following four sections of the roads:

- The main hill on the north entrance, 2013
- The west entrance hill, 2014
- The east turn of Eagle Feather Lane, 2015
- The Red Cloud Hill, 2016

Each of these areas will be addressed in turn, with the cycle of road improvements<sup>5</sup> continuing after a yearly review of conditions. The two most important components of good gravel roads are good road base, a decent crown, and shoulder/ditches. It is important to guard against short term fixes that are ineffective or counterproductive. Other than poor road base, activities that take the crown off, or move road base into the ditches are the number one cause for bad roads. Scraping roads with a box scraper to reduce washboarding causes more damage than good as that practice takes the crown off the road. Grading when it is dry is ineffective.

## Road Repair

Road repair will occur when an event damages the roads, and must be repaired for safety reasons. It is reasonable to expect some repairs as a result of a heavy rain, or run off after a heavy snow. The 2019 approved budget leaves the Association with a surplus in the checking account, and we would anticipate using that for unexpected repairs, if necessary. In the event the roads required repair as the result of something other than the weather, the Board would expect the person who damaged the road to repair it, at no cost to the community.

## Review of 2014 Actions

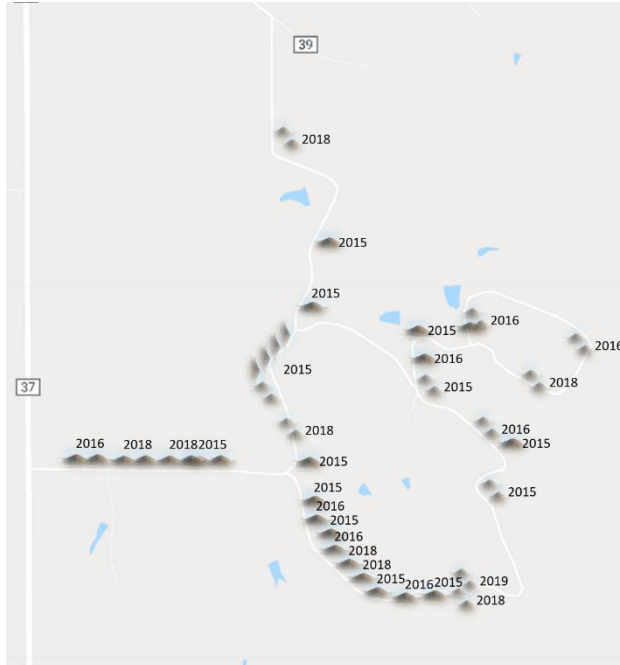
The work done on the west hill was successful and that seems to be holding up well. Repair work on Red Cloud stopped an erosion problem from getting worse. The board decided to attempt some improvements on Eagle Feather Lane between, Red Cloud and Comanche Creek, but funds did not allow a complete fix at that time. As a consequence of heavier traffic on that part of the road and nearly complete loss of road base over time, that portion of road becomes a slick muddy mess during periods

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<sup>5</sup> See [www.epa.gov/owow/nps/gravelman.pdf](http://www.epa.gov/owow/nps/gravelman.pdf) for an excellent summary of how to maintain a gravel road.

of heavy rain and snow melt. For these reasons, the board decided to change the plan to focus on that portion of the road in 2015 instead of the easternmost part of Eagle Feather, as planned in last year's version of the plan.

## Review of 2015-2018



**Figure 6 Road Improvements 2015-18**

Figure 6 shows the road improvements from 2015 through 2018. Similar to the 2011 event, again in 2018, Texas X-ing #13, suffered damage when following a severe thunderstorm the stream over topped it and the water scoured out an area on the north (outflow or downstream side)<sup>6</sup>. Initially, the goals for Red Cloud Hill were met however, the 2015 road base on the hill on Eagle Feather between Red Cloud and Comanche Creek didn't last and needs replacement again. CCROA added major amounts of road base in 2017 and 2018. Through a fortuitous series of circumstances, CCROA obtained 60 loads of road base for the cost of delivery and was able to add high quality<sup>7</sup> road base to many trouble spots as seen in the Figure 6. Once the road base was delivered, CCROA volunteer members used their own

equipment to spread the material along the road. We also had a rolling compactor working with a water truck for some of the improvement areas and purchased water from the Town of Elbert for the water truck.

In addition to bringing in road base the Road Committee conducted a survey of all the Culverts and Crossings shown earlier in Figure 2. The results of this survey are shown in Figure 7 on the next page.

<sup>6</sup> The structure has been there for well over 20 years and required repair in 2011 for the same reason. Although ostensibly designed for the water to overtop it, the outflow side does not hold up well as constructed. Anecdotal evidence is the over top events occur at least every couple of years.

<sup>7</sup> 60 loads in this case is approximately 900 yd<sup>3</sup>. CCROA paid for delivery of 52 and members donated 8. The material was sieve tested and was AASHTO: A-1-a. For a gravel road, this is excellent to good.

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## Comanche Creek Ranches (CCROA) Culvert tasks 9-22-2018

- 1) 18-40\*, Culvert damaged. East side of road outflow below grade, needs trenched out.
- 2) 18-40, Culvert damaged. East side of road outflow below grade, needs trenched out.
- 3) 36-60, Good condition, no work required.
- 4) 16-40, Work performed, Outflow below grade, needs trenched out further.
- 5) 24-48, Good condition.
- 6) 18-48, Good condition. North side outflow fully blocked.
- 7) 24-48, Good condition, North side outflow 1/2 blocked.
- 8) 18-48, Good condition, some damage. Delineator laying in North side ditch.
- 9) 36-48, Good condition.
- 10) 30-48, Good condition.
- 11) 18-48, South side damaged, North side outflow needs trenching.
- 12) 16-48, Both ends damaged and need trenching.
- 13) 24-60, South Texas Crossing, Delineators to be added to slab corners.
- 14) 16-48, Good condition, North side needs trenching. (partially blocked)
- 15) 16-48, Good condition, Both ends need some minor trenching.
- 16) 18-40, Damage on both ends. (minor)
- 17) 24-60, Good condition.
- 18) 48-48, Concrete culvert, Good condition.
- 19) 24-48, Good condition.

\*00-00 indicates size of culvert, example 36-60 means 36" diameter and 60' in length.

### Miscellaneous culverts that concern main roads:

- 1) Skowronek driveway 12" — North side needs trenched, below grade.  
(Outflow side ice's up and melting snow washes across the roadway)
- 2) Sinel driveway 16" — North side outflow completely blocked.

### Miscellaneous tasks:

- 1) Remove barbed wire on West side of North cattle guard "A".
- 2) T-posts (2) close to road edge south of culvert #3, East side of road.
- 3) Remove barbed wire on both sides of West cattle guard "C".

Figure 7 Culvert and Crossing Status

CCROA volunteer members held a work day and repaired many of the issues on the culvert task list. CCROA members also performed mowing activities. In practice many members mow their easements well above the minimum and take the time to mow the easements for the north and west entrances as

well. For this reason, and the death of our previous contract mower with whom we had an exclusive relationship, there have been little to no mowing expenses for the last 5 years. However, the mowing is still getting done. We have a similar situation with snow removal. Starting in 2017, CCROA has been unable to contract with someone to perform snow removal. Luckily, there were members here with equipment capable of moving the snow and these volunteers kept our community open until conditions reached the point of a county wide shut down.

## 2019-2021 Plan Summary

As of the writing of this Plan, the roads are in fairly good shape. Road grading will be done 1-2 times per year to restore crown, and eliminate washboarding. Grading will be timed with moisture, and other improvements when possible. This plan recognizes members are taking care of the mowing on their own so CCROA mowing expenses are reduced by this naturally occurring volunteer activity and can be used elsewhere. Snow removal will be as stated in Appendix A, Snow Removal Policy. For road maintenance and repair more material needs to be continually added to the roads, and there is a X-ing that needs attention.

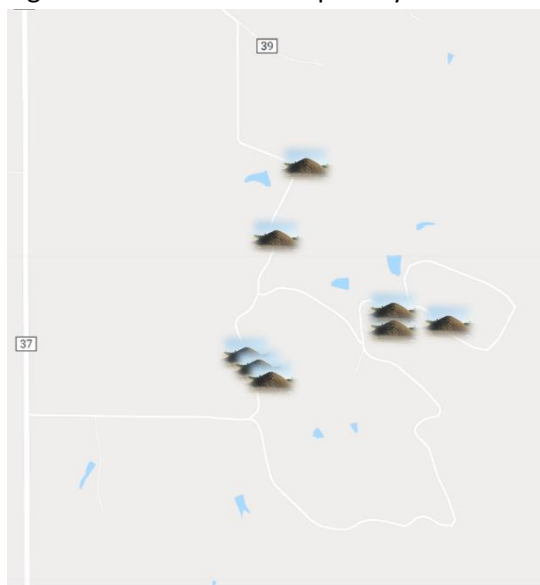
### Near Term Objectives

- Grade the road one more time (2019) and twice a year following that.
- Find a company / sole proprietor to perform snow removal
- Maximize purchase of quality road material while the supply is available
- Plan for, and repair crossing #13 (Figure 2)

### Far Term Objective

- Continue adding quality road base per available budget

Figure 8 below shows the priority locations for future road base over the next few years 2019-2021.



Anticipated Locations for Future Road base

Figure 8 Focus Areas for Road Base Improvements



## Appendix A, Snow Removal Policy

### CCROA Snow Removal Policy

14 Feb 2004

The CCROA snow removal team will contract with a snow clearing contractor when snow plowing is required on CCROA roads.

**Designation of “snow plow caller.”** The snow removal team lead is the primary member to make the call and will generally do this in consultation with other members. In the event he or she is not in town, arrangements will be made to designate a specific person to make the call. This designation is required to avoid two people calling to have the roads plowed. The current team lead is Jeff Briscoe 720-445-9623.

**General Guidelines.** The roads will be cleared when the following conditions occur: snow accumulates to a depth greater than six inches, or snow drifts across the road more than 12 inches in multiple locations. Timing of snow clearing will be aimed to have roads cleared for the early morning workers, after the snowfall quits. We would expect to have the roads cleared once per snow event.

**Members clearing the roads.** Some members have equipment capable of clearing the roads. When it snows a little bit and someone wants to clear the roads, or a portion of the road, they are welcome to do this on a volunteer basis. The committee requests such volunteers coordinate this with the snow removal team. Volunteers assume all responsibility for their actions, and the association bears no responsibility or liability for injuries/damages to persons, equipment, or property. In the event of a larger snowstorm, the committee may contract with members to have the roads cleared if their equipment is suitable for the task.

**Blizzards.** It is neither safe, nor practical to attempt clearing the roads during a blizzard. There will certainly be times when the combination of accumulated snow and drifts will make the roads impassable within Comanche Creek and Elbert County. The snow removal team will make reasonable efforts to have the CCROA Roads cleared to coincide with the clearing of County Roads 37 or 39.

**Types of clearing.** Depending on the amount of snow, the snow removal team will consider calling for a truck-mounted blade, or a grader. The distinction is some snows cannot be cleared with a truck, and heavier equipment is required. It is only by experience and inspection of the problem areas can this judgment be made. The snow removal team will maintain records on the frequency and types of clearing required.

**Billing.** Bills for snow clearing will be submitted to CCROA, PO Box 292, Elbert CO 80106.