

October 4, 2011

South Rampart TMP  
2400 E. Mountain Ave.  
Fort Collins, CO 80524

RE: Draft EA for the South Rampart Travel Management Plan

To Whom It May Concern:

Thank you for the opportunity to comment on the Environmental Assessment for the proposed South Rampart Travel Management Plan revision. Douglas County Government understands the purpose and need for the revision. We support the effort and agree with the much, but not all, of the proposed change. Your consideration of environmental impacts and concessions for the various users such as the additional single track trail and open off-road areas is commendable.

Douglas County Government has only a few comments and one request for change to the preferred alternative. That change should have very little impact on the overall concept and direction of the plan, but it is of great significance to Douglas County Government. We believe that Douglas County can assist the Pikes Peak District in accomplishing their goals through an additional partnership, as explained below.

**FS Road 327:** In the preferred alternative, a significant portion of FS Road 327 is shown as closed and rehabilitated. The roadless area boundary is shown as modified to encompass the areas of FS 327 proposed for closure.

Douglas County Government requests that this road remain open and that the roadless area not be expanded. Reasons for our request include:

- detrimental impacts to four existing Community Wildfire Protection Plans (CWPPs),
- reduction in potential for fuels and environmental forest treatment in that area,
- reduction in the ability to respond to wildfire in the area and to create fire breaks
- reduced access to that area for hunters and other recreational user groups that have no other access to roughly 11 sections of USFS land serviced by the existing FS Road 327,

- and reduced potential for trail connections Douglas County Government (the County) is actively pursuing with the South Platte Ranger District as part of a larger trail system.

Some positive changes have occurred in the last year, such as the County's imminent acquisition of the Emily Griffith Center, that make the need to leave FS Road 327 open even more salient. The following paragraphs more fully describe our reasons for this request.

This area of the National Forest lies just west of several residential communities including Perry Park, Valley Park, Woodmoor Mountain, and Sandstone Ranch. The adjacent forest is very dense and some of the terrain is very steep. This area of wildland-Urban Interface (WUI) has a significant associated fire risk. Appendix A includes the Community Wildfire Protection Plan (CWPP) WUI zone maps for the Woodmoor Mountain, Valley Park and Perry Park subdivisions. All three of these CWPPs identify the area near the end of FS Road 327 as WUI that affects their communities.

The Douglas County CWPP Community Wildfire Hazard Potential map is included in Appendix B. It identifies the wildfire hazard of these communities as follows:

Valley Park: High  
Perry Park: Very High  
Woodmoor Mountain: Extreme

Appendix B also includes the Wildfire Hazard Potential map for Douglas County. The areas in the vicinity of the proposed closure of FS Road 327 are rated predominantly as High, with small areas of moderate and extreme.

There are roughly 11 sections of USFS land in Township 10 S, Range 68 W made more accessible by the portion of FS 327 proposed for closure; there is no other road that comes close. These 11 sections are overlapping WUI as designated in the three above-mentioned community CWPPs. Access to this area for staging, cutting fire breaks or general response to wildfire should not be restricted. Fire could come from either direction, and could initiate in the communities and affect the forest at least as easily as a fire originating on the forest could affect the several nearby communities. Closing and reclaiming FS 327 and expanding the roadless boundary will limit fire access to this very important area of High Hazard Potential WUI.

The County and the local communities would like to maintain the option for fuels treatment in the area near the end of FS 327. We recognize that each Ranger District has its own priority list for treatment, and that this area may or may not rank high on such a list. We also recognize that there are constraints to treatment in this vicinity.

After nine years of attempts, the South Platte Ranger District was finally able to perform a thinning project on 80 acres of forest immediately adjacent to Perry Park last year. It was only the availability of ARRA grant monies that allowed this project to be completed. A great deal more thinning should be done in this vicinity, but a number of factors frequently stymie those efforts. Those factors include steep terrain, limited access, proximity to residential areas, air quality concerns and roadless area restrictions, which increase the difficulty, duration, and expense of getting such projects approved and implemented. Closure of FS 327 and increasing the amount of roadless area in this vicinity will further detract from our mutual ability to perform more treatment.

Another reason Douglas County believes that this road should remain open is for recreational access. There is very limited access to this area of the national forest. Much of the adjacent area is designated as roadless, and there are very few trails. There are no currently designated trails that serve the Rampart East Roadless Area in a wide arc around the proposed closure of Road 327. Only extremely fit and determined individuals can use this area. Closing road 327 will exacerbate the situation.

Hunting is one activity that really should occur in this area. Currently, there are significant populations of deer and turkey in the area. The area also sees use by mountain lion, bear, and elk. With the high prevalence and transmission of chronic wasting disease (CWD) in deer in residential communities (3-15% in natural settings but up to 40% in subdivisions) it is important to keep deer populations in check to help to prevent or slow disease spread. Additionally, there have been a number of mountain lion and bear problems along the forest edge. These problems usually involve animals becoming habituated to humans, and the propensity of habituated individuals to engage in nuisance or dangerous behavior. Hunting can cull problem individuals as well as generally working as negative reinforcement to help prevent or reverse habituation.

Trail access is another concern of the County in this area. For a number of years now, the County has been working with Randy Hickenbottom, South Platte District Ranger, on a conceptual plan for a non-motorized trail along the eastern edge of the national forest. We've christened it the 'Forest Edge Trail'. The concept is to have a hiking, mountain biking, and

equestrian trail that would weave in and out of the National Forest by as much as two miles in either direction of the boundary. This trail could potentially extend from Kassler to Mount Herman Road.

The County has been working to secure trailheads and trail alignments on the private ground adjacent to the National Forest boundary in support the Forest Edge Trail or other trail linkages. We have already secured and 'roughed in' a 2-mile trail alignment just north of Perry Park on the Wiens Ranch. This spur will eventually become part of the Forest Edge Trail system.

The County has also secured a commitment from Sandstone Ranch for a one-acre trailhead and trail alignment from Perry Park Blvd. to the National Forest Boundary. Trail 627 appears on the Pike Forest Map dated 1970/Partial Revision 1985. Trail 627 connects road 327 with the Sandstone Ranch. We believe it is important to maintain road 327 as open to potentially reopen trail 627 or a substitute alignment and make a badly-needed connection in this area.

The County is in the process of purchasing the Emily Griffith Center. This acquisition provides a great opportunity for another trailhead and non-motorized trail connection to the National Forest. The Emily Griffith Center is directly in line with the existing FS Road 327 and the remnants of the road or trail that extended east from its currently designated end. Please see Appendix C for a location map. We are very hopeful that we can work with our partners, especially the South Platte and Pikes Peak Ranger Districts to make this location work for these purposes.

**Douglas County Maintenance of USFS Roads:** Douglas County maintains some USFS roads within the Pikes Peak Ranger District under 'Schedule A' agreements. Our operations team does not believe that the proposed changes will have any significant impact to those agreements or the work required.

Douglas County would like to suggest further cooperation on USFS Road 327. We understand that FS Road 327 is somewhat degraded, and that that is one of the considerations in the Pikes Peak Ranger District's proposal to close a portion of it. Douglas County Operations is willing to assist the District in improving Rd. 327 if the District is willing to keep it open to the public. We would be happy to discuss this opportunity with the Pikes Peak District Staff at their convenience.

**Conclusions:** Douglas County Government wrote a letter addressing these concerns in April 2010. County staff met with Frank Landis of the Pikes

Peak District on a couple of occasions as well. While we understand that many issues and viewpoints go into plans of this magnitude, the issue of the closure of FS 327 and increase in the roadless area is a serious concern to us. No changes have been made to accommodate the County's concerns. If this minor change can be made to the plan, the County could whole heartedly support the proposed alternative (Alternative B). If our requested change is not supported, the County would not support the proposed alternative; it would support either Alternative A or C.

Once again, Douglas County would like to thank the Pikes Peak Ranger District for their hard work and open approach to this management process. We appreciate your communications with Douglas County Government. Please feel free to contact us if you have any questions or would like to continue the dialog on further opportunities for collaboration and partnership.

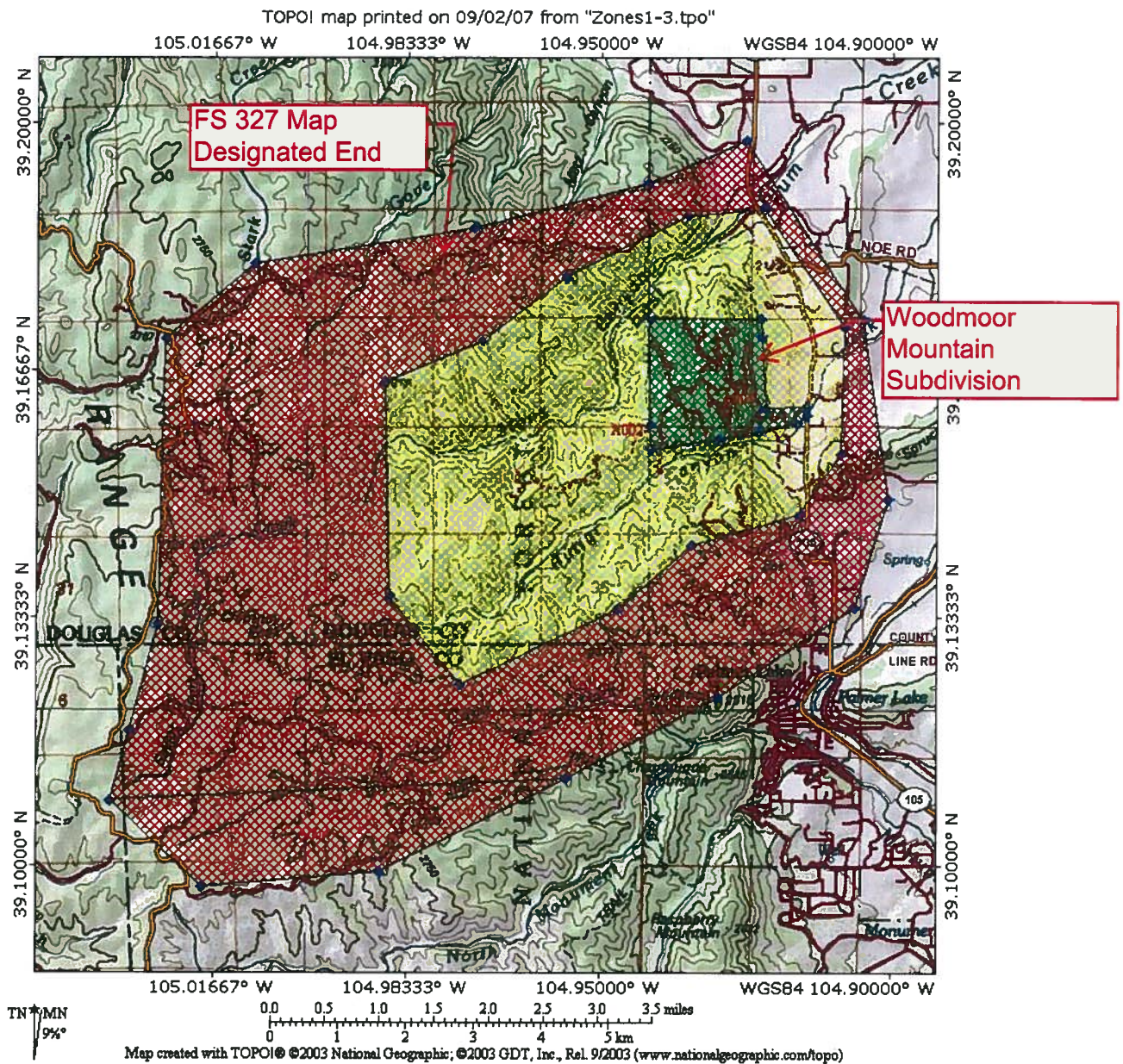
Respectfully,



Douglas J. DeBord  
County Manager

cc: Jerri Marr, Forest Supervisor, Pike and San Isabel National Forests  
Brent Botts, District Ranger, Pikes Peak Ranger District

**Appendix A**  
**Community Wildfire Protection Plan (CWPP)**  
**Wildland Urban Interface (WUI) Zone Maps**  
**From the CWPPs of Woodmoor Mountain, Valley Park and Perry Park**



**Figure 3. Woodmoor Mountain WUI Zones**

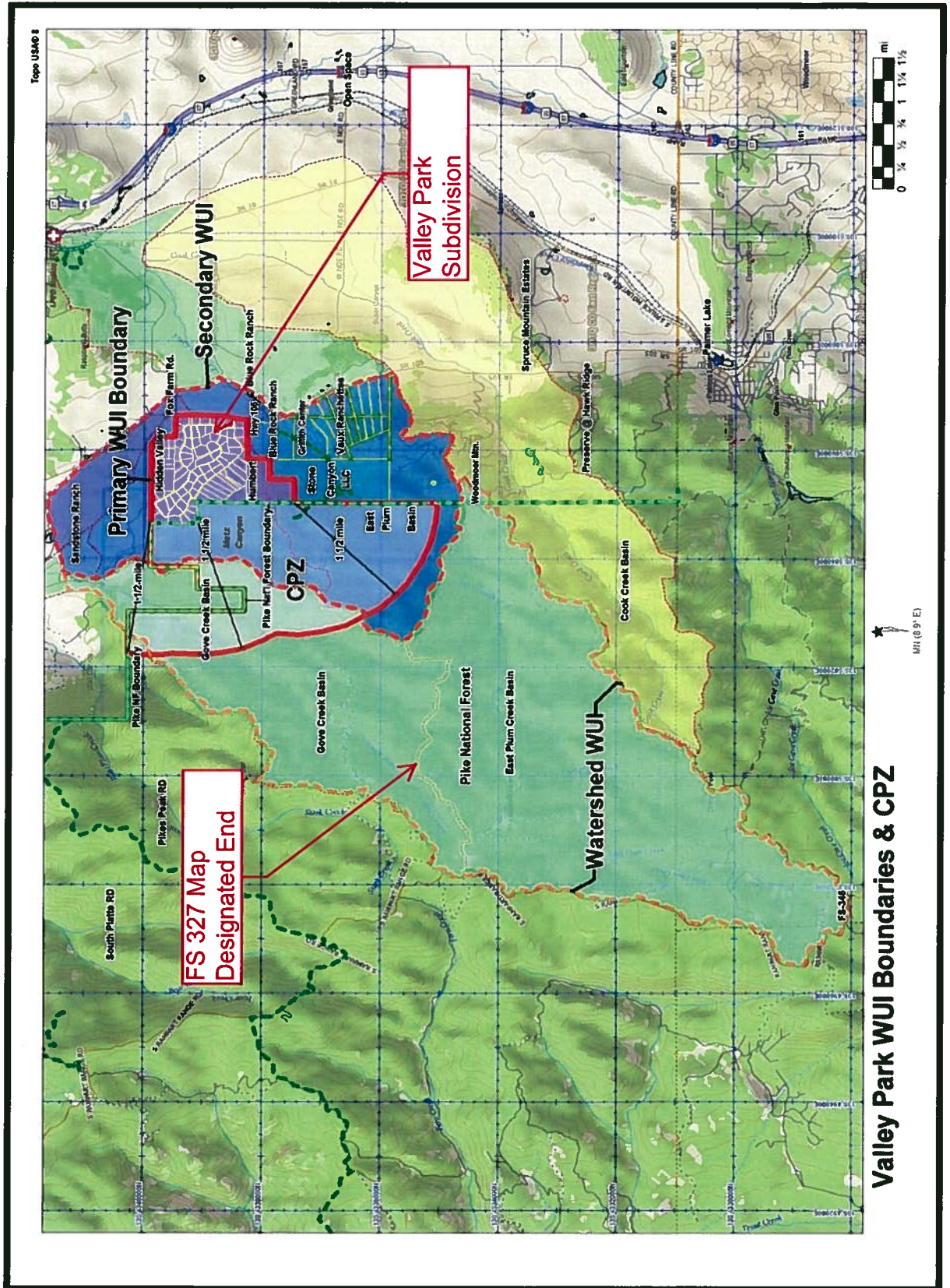
### Zone 1

Zone 1 is Woodmoor Mountain shown in Figure 4. It consists of the community and is approximately 800 acres in size. The WMHOA owns approximately 50 acres as common area and right-of-ways.

Fuel treatment projects have been on-going on private lots since 2002. Homeowners and property owners have been encouraged to implement Firewise guidelines around all structures through educational efforts of the WMHOA, LFPD and Colorado State Forest Service.

In the past, removal of trees and vegetation was strictly controlled by the Architectural Control Committee under the WMHOA Covenants, Conditions and Restrictions (CC&R's) and Design

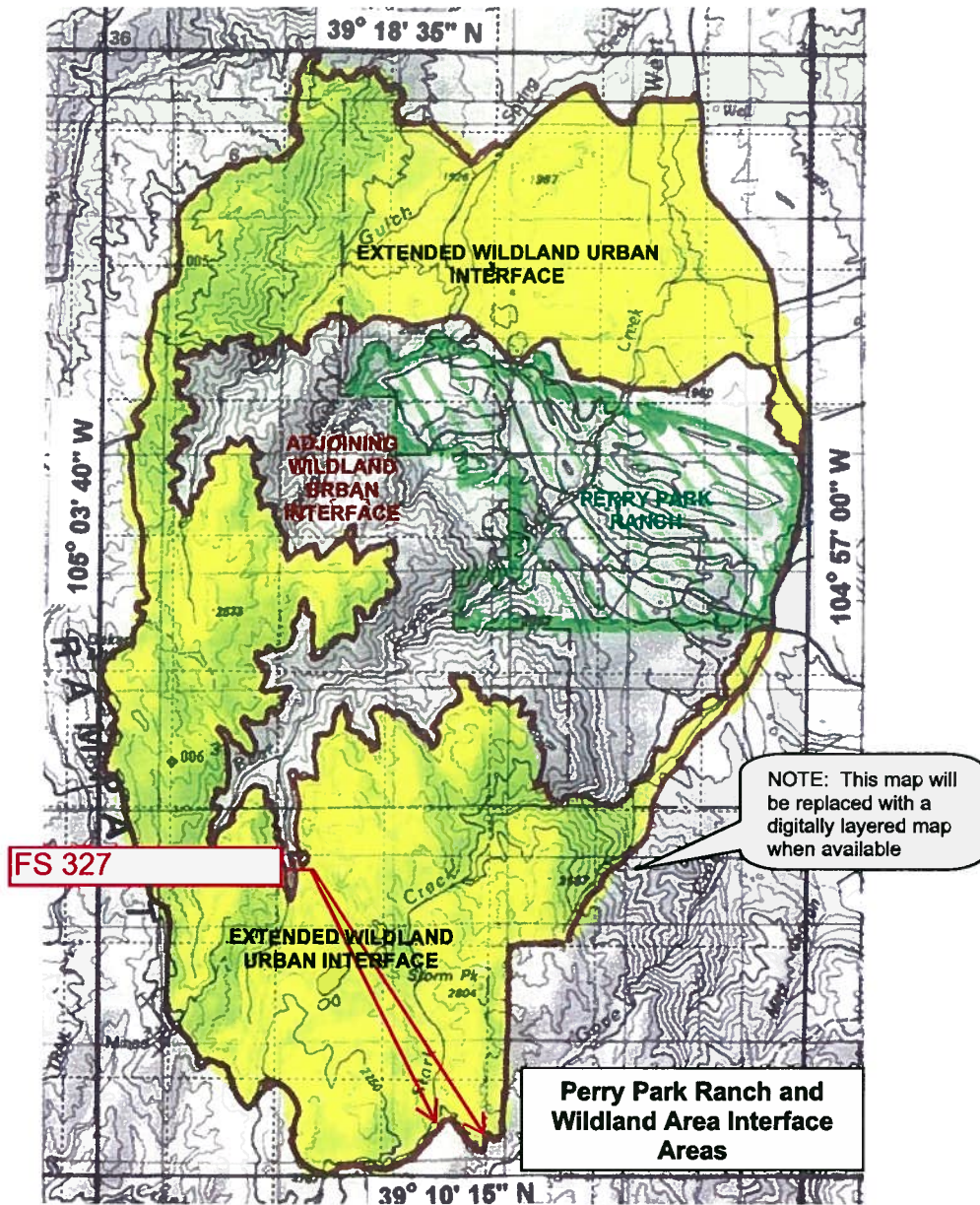
IV Establish Community Base Map





grasses) from adjacent ranch lands. This southeastern area features these prairie grasses gently sloping west to northwest into heavy stands of Gamble oak, followed further to the west and northwest by significant up-sloping terrain into heavy Ponderosa pine forested areas.

Extending beyond the immediate wildfire threat posed by the adjacent National Forest land is a more distant fuel belt comprising National Forest land in the west and private property in the south and southeast. Basically, this fuel area is bounded by Dakan Road on the north, Rampart Range Road on the west, south to Fern Creek. From Fern Creek as its southernmost point this area extends diagonally to the northeast to Highway 105 that serves as the eastern border of the more distant fuel belt area.



**Appendix B**

**Excerpts from Douglas County Community Wildfire Protection Plan (CWPP)**

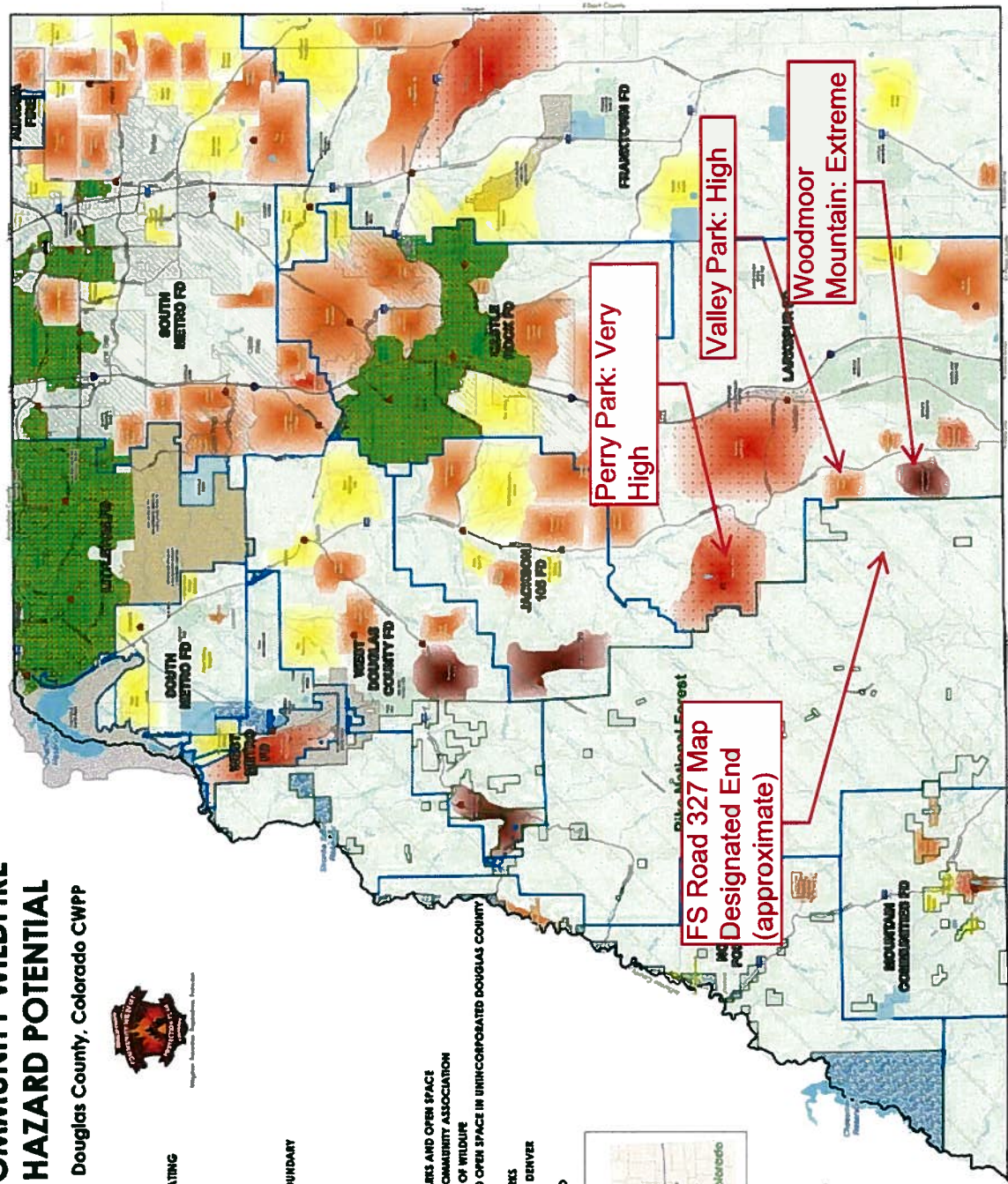
- **Wildfire Hazard Potential Map**
- **Community Wildfire Hazard Potential Map**

# COMMUNITY WILDFIRE HAZARD POTENTIAL

Douglas County, Colorado CWPP



- Legend**
- COMMUNITY HAZARD RATING
    - Extreme
    - Very High
    - High
    - Medium
    - Mixed
    - Low
  - INCORPORATED AREA
  - DOUGLAS COUNTY BOUNDARY
  - LAKE/RESERVOIR
  - STREAM
  - MAJOR ROAD
  - LOCAL ROAD
  - FIRE STATION
  - LOOKOUT TOWER
  - OWNERSHIP
    - DOUGLAS COUNTY FARMS AND OPEN SPACE
    - HIGHLANDS BANCHE COMMUNITY ASSOCIATION
    - COLORADO DIVISION OF WILDFIRE
    - MUNICIPALITY-OWNED OPEN SPACE IN UNINCORPORATED DOUGLAS COUNTY
    - STATE LAND BOARD
    - COLORADO STATE FARMS
    - CITY AND COUNTY OF DENVER
    - USDA FOREST SERVICE
    - DENVER WATER BOARD



Community Wildfire Hazard Potential Map

# WILDFIRE HAZARD POTENTIAL

Douglas County, Colorado CWPP



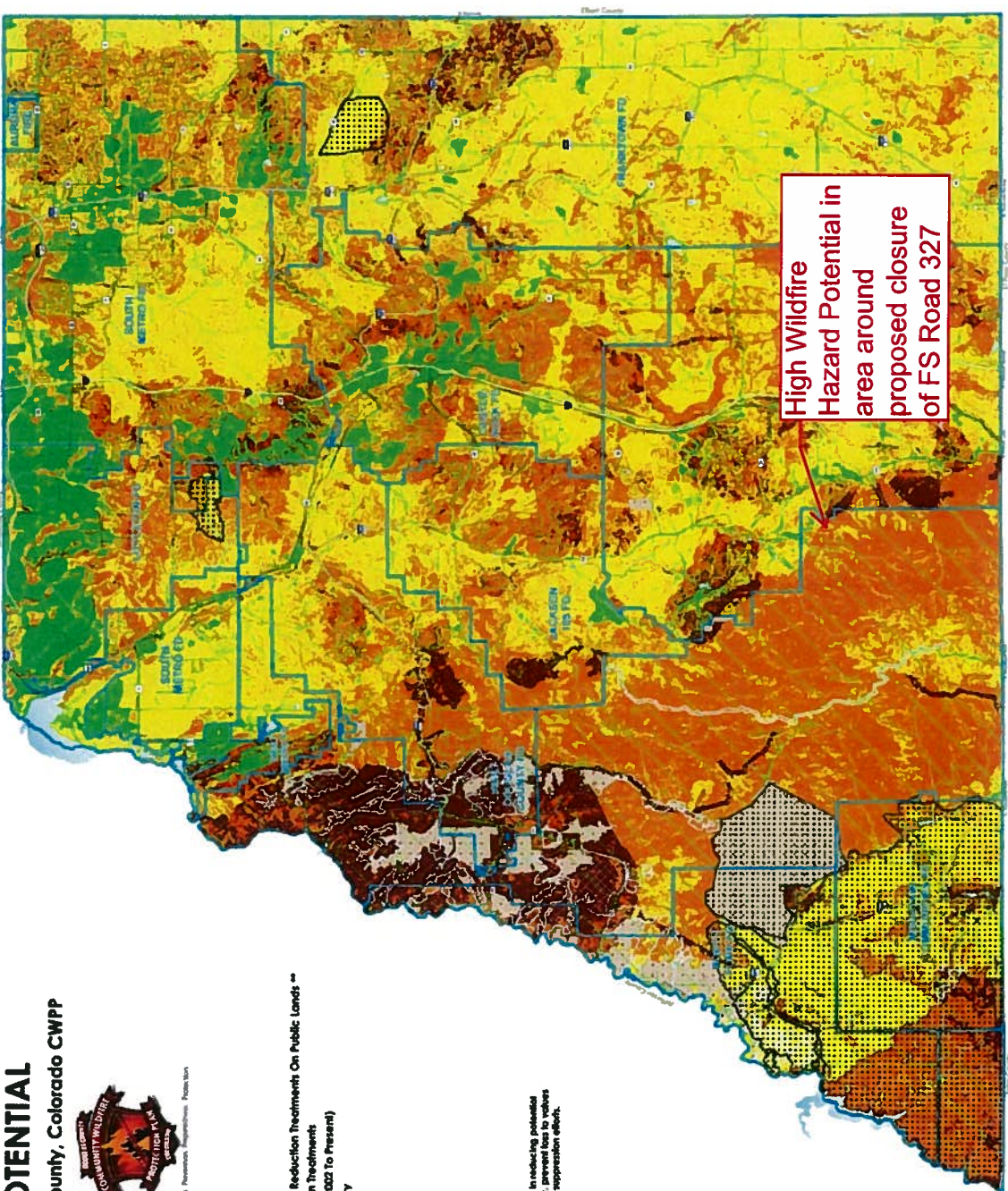
Mapmakers: Performance Systems, Inc. Photo: iStock

- Legend**
- Hazard Level - Low
  - Hazard Level - Moderate
  - Hazard Level - High
  - Hazard Level - Extreme
  - Completed / In Progress Fuels Reduction Treatments On Public Lands \*\*
  - Planned Future Fuels Reduction Treatments
  - Historic Large Wildland Pres (2002 To Present)
  - Fire Protection District Boundary
  - Pike National Forest
  - Lakes
  - Streams
  - Interstate
  - US Highways
  - State Highways
  - Major Roads
  - Local Roads
  - Railroad

\*\* Fuels reduction treatments are effective in reducing potential fire behavior to provide for public safety, prevent loss to values at risk and increase effectiveness of fire suppression efforts.

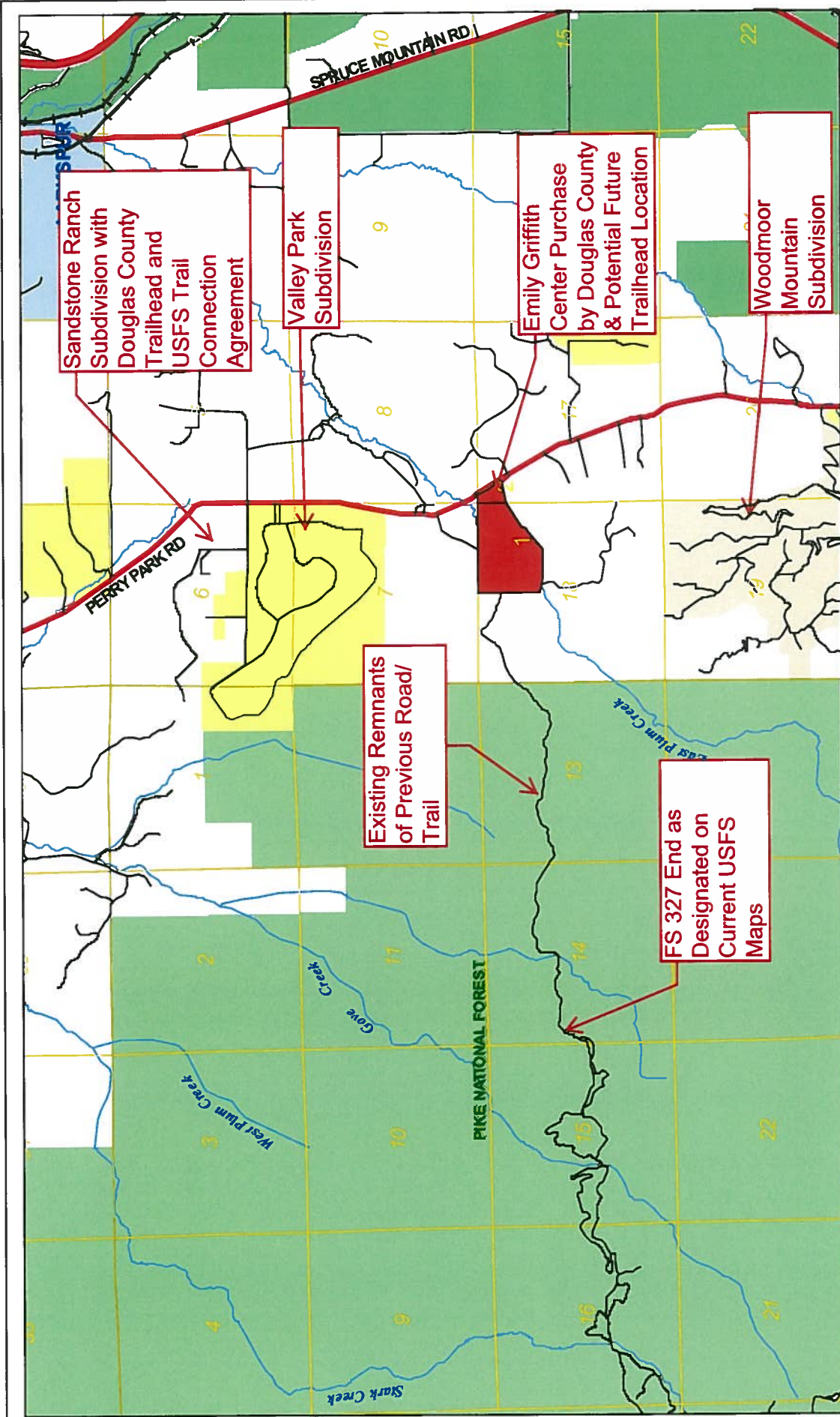


**Map Data:**  
 Base Map: Performance Systems, Inc. (2018)  
 Aerial Imagery: Performance Systems, Inc. (2018)  
 Topographic Data: Performance Systems, Inc. (2018)  
 Fire Protection Districts: Douglas County (2018)  
 Historic Large Wildland Pres: US Forest Service (2002 To Present)  
 Fuels Reduction Treatments: Douglas County (2018)  
 Road Network: Performance Systems, Inc. (2018)  
 Water Features: Performance Systems, Inc. (2018)



High Wildfire Hazard Potential in area around proposed closure of FS Road 327

**Appendix C**  
**Emily Griffith Center Location Map**



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General questions about this or any other Douglas County GIS products including errors, corrections, comments and/or updates should be directed to the Douglas County GIS Division at (303) 660-7416.

# Emily Griffith Center Acquisition

- Legend**
- Major Roads
  - Other Roads
  - Railroads
  - Schools
  - Parcels
  - Municipalities

