



# LARKSPUR FIRE PROTECTION DISTRICT

9414 South Spruce Mountain Road Larkspur, Colorado 80118  
Business Phone (303) 681-3284 Fax: (303) 681-3201

November 1, 2019

John Dow,  
PSI Forest Planner Travel Management Pike and San Isabel National Forests  
2840 Kachina Drive Pueblo, CO 81008  
Re: LFPD Comments on the PSINF MVUM Plan

Dear Mr. Dow:

The Larkspur Fire Protection District (LFPD) in Douglas County values this occasion to provide feedback into the Pike, San Isabel National Forest Motor Vehicle Use Management Plan (PSINF MVUM) Draft Environmental Impact Statement (DEIS) analysis. The following are our requests, comments and observations.

## **Alternatives:**

**The LFPD supports Alternative A.** The LFPD opposes the closure of any roads or trails within the LFPD area of primary concern that would preclude the ability of the Pike National Forest (PNF) to access for wildfire response or forest management activities and for the LFPD to access for wildfire and medical response. The roads and trails on the east side of Rampart Range Rd. are of particular importance and should remain, as there is a large gap in road or trail access east of Rampart Range Rd. to the east border of the PNF between Mt. Herman Rd. and Dakan Rd.

**The LFPD could support Alternative C with the following modifications.** Of particular importance to keep open to wildfire and emergency medical responses are the following routes: FS RD 327, FS RD 324.B, FS RD 323. All of these routes provide enhanced access to areas for suppression of wildfire ignitions that could grow into fires that can threaten communities within the LFPD. FS RD 327 could be extended as a trail to the Sandstone Ranch Open Space and the LFPD is in support of that connection for wildfire suppression access.

**The LFPD opposes Alternatives B, D and E.**

## **Alternative support and opposition background:**

This review and recommendations are focused on the eastern portion of the Rampart Range incorporating the area between Highway 67 and the eastern boundary of the PNF as the LFPD area of primary concern. The LFPD has a mutual aid agreement in place with the PNF for wildfire response within one mile of our mutual border. The LFPD also responds to fire and medical calls into a larger area of the PNF through an agreement with Douglas County and also participates in medical support for Douglas County Search & Rescue missions depending on the mission location. The LFPD is a Cooperating Agency with the State of Colorado and has responded to numerous wildfires in the PNF over the last two decades through PNF requests for aid through Pueblo Interagency Dispatch.



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The LFPD area of primary concern is established with the knowledge that wildfire ignitions within this area have a strong potential to become large wildfires with the ability to enter the LFPD and destroy our communities. There are three communities within the LFPD that border the east boundary of the PNF. They are; Perry Park Ranch (825+ homes and 475 lots yet to develop), Valley Park (70 homes with about 16 lots yet to develop), and Woodmoor Mountain (70 homes with approximately 60 lots yet to develop). Additionally, Spruce Mountain estates (71 homes with 9 lots yet to develop) is 1.4 miles from the PNF east boundary and Remuda Ranch (under active development with 100+ lots) is 1.2 miles from the PNF border and contiguous to the Perry Park Ranch community. This puts over 1000 homes at risk now with the potential for almost 700 additional homes at risk in the future.

These communities are at great risk from catastrophic wildfire originating in the PNF. Perry Park Ranch, Valley Park, and Woodmoor Mountain were all under mandatory evacuation during the 2002 Hayman Fire (138,114 acres, 6 fatalities and 133 structures destroyed). Also, in 2002 the Schoonover Fire (3,862 acres and 12 structures destroyed) occurred within our area of concern. Other wildfires within the PNF and adjacent to our area of concern are the 1996 Buffalo Creek Fire (11,875 acres and 18 Structures destroyed), the 2000 High Meadow Fire (10,800 acres and 51 structures destroyed), and the 2012 Lower North Fork Fire (4,140 acres, 3 fatalities and 27 structures destroyed).

While we understand and appreciate the complexities and considerations involved in arriving at decisions on this matter, we strongly feel that there is one consideration that supersedes all of the others. Catastrophic wildfire is the one element that can make all of the other concerns and rationales for decisions regarding the MVUM Plan, moot.

First and foremost, if the PNF is not managed to return it to the fire adapted ecosystem that it generally once was, all of the other resource management goals will be lost at the drop of a match or the strike of a lightning bolt. A forest of black sticks and scorched earth does not promote, support, achieve or maintain any of the resource management objectives and ecological concerns addressed in the DEIS. Catastrophic wildfire will ravage the natural resources that are embraced by the public and forest managers alike.

Within the LFPD area of concern, the propensity for a large, high intensity wildfire is significant. The quantity, density and decadency of the fuels to support such a fire are in place and ubiquitous. The terrain is very rugged and steep while many of the drainages are in alignment with the prevailing winds that occur during fire season. Under red flag weather conditions in a drought year, an ignition source at the right location is all that is needed to launch a catastrophic wildfire. Colorado's largest wildfire, the Hayman Fire, occurred within the area





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that is under analysis for the PSINF MVUM Plan and provides ample evidence of the potential for catastrophic wildfire to occur and the damage wrought.

All wildfires start small. It is the surrounding fuels, weather and terrain that are the constraints or the accelerators on fire growth and fire behavior. Humans cannot change the weather or terrain, but they can modify the fuels. To substantially reduce the prospect of catastrophic wildfire, forest restoration work to achieve a fire adapted forest over large areas is needed. Enabling the quick response of appropriate suppression resources is also a very important key to keep a small wildfire small.

These two critical measures for the prevention of catastrophic wildfire share a common need. That need is access. Roads are the means to provide that access. Any reductions to the existing road system within the PSINF will be to the severe detriment of the prevention of catastrophic wildfire. The LFPD is in 100% agreement with the statement below from Chapter 3.15.1 of the DEIS.

*"On the PSI, successful wildland fire management and prevention involve a combination of various tactics, all of which are contingent on firefighters' ability to access wildland fire situations safely and efficiently. Networks of trails and roads on the PSI allow wildland firefighters to rapidly access, control, and extinguish fires.*

*Additionally, trails and roads on the PSI allow access to forest tracts for prescribed fire and vegetation treatments to manage fuel loads. Accessibility for firefighters in the decision area lends itself to proper management and appropriate suppression and response for wildland fires, with strategies that employ the least risk to safety, least cost, and lowest loss of resources achievable."*

It is also significant to add that all roads and trails can be utilized as pre-constructed fire line and used tactically to control a wildfire and to anchor prescribed fires saving both time and expense while not introducing new disruption to the forest soils. Closing existing roads and trails that could function in the capacity of fire line only to scar the forest with new fire line construction makes no sense.

Another consideration is the shutdown of the burn area after the fire. All uses in burn areas are restricted after a fire due to the hazards caused by the fire and then remain long after the fire is out. Snag hazards, flooding and the resulting erosion with increased landslide potential are just some of the hazards caused by a wildfire. The shutdown of a burn area is also likely to affect access to other parts of the forest that were unaffected by the wildfire itself. The closure of potential alternate routes due to the MVUM Plan will only complicate this situation and may cause delays for suppression resources to reach the next fire.



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In addition to the many tragic levels of human and ecologic impact of catastrophic wildfire, the costs of suppression and recovery from catastrophic wildfires far exceed the expense of sound forest management practices designed to reduce such events.

Implementation of myopic concerns regarding roads and trails will likely contribute to the rise of a catastrophic wildfire and the large scale destruction of the resources and ecosystems that are sought to be preserved and enhanced. Truly, the question is when, not if, such a wildfire event will happen.

Attachment A to this letter contains maps that help to clarify wildfire threats and community locations.

Thank you for your consideration of the LFPD requests in the final revision of the MVUM.

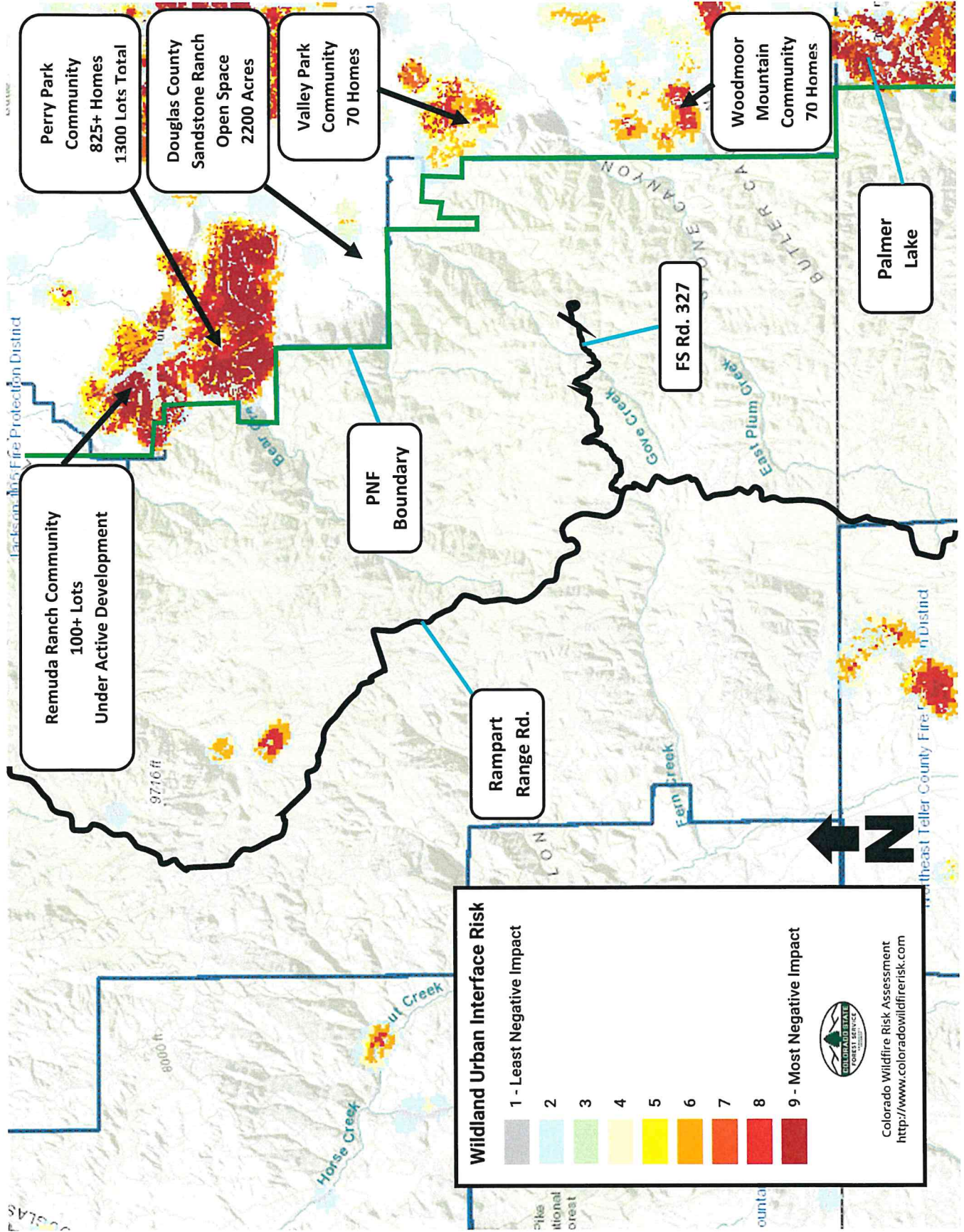
Stuart Mills  
Fire Chief  
Larkspur Fire Protection District

A handwritten signature in blue ink, appearing to read "Stuart Mills", is written over a horizontal line.

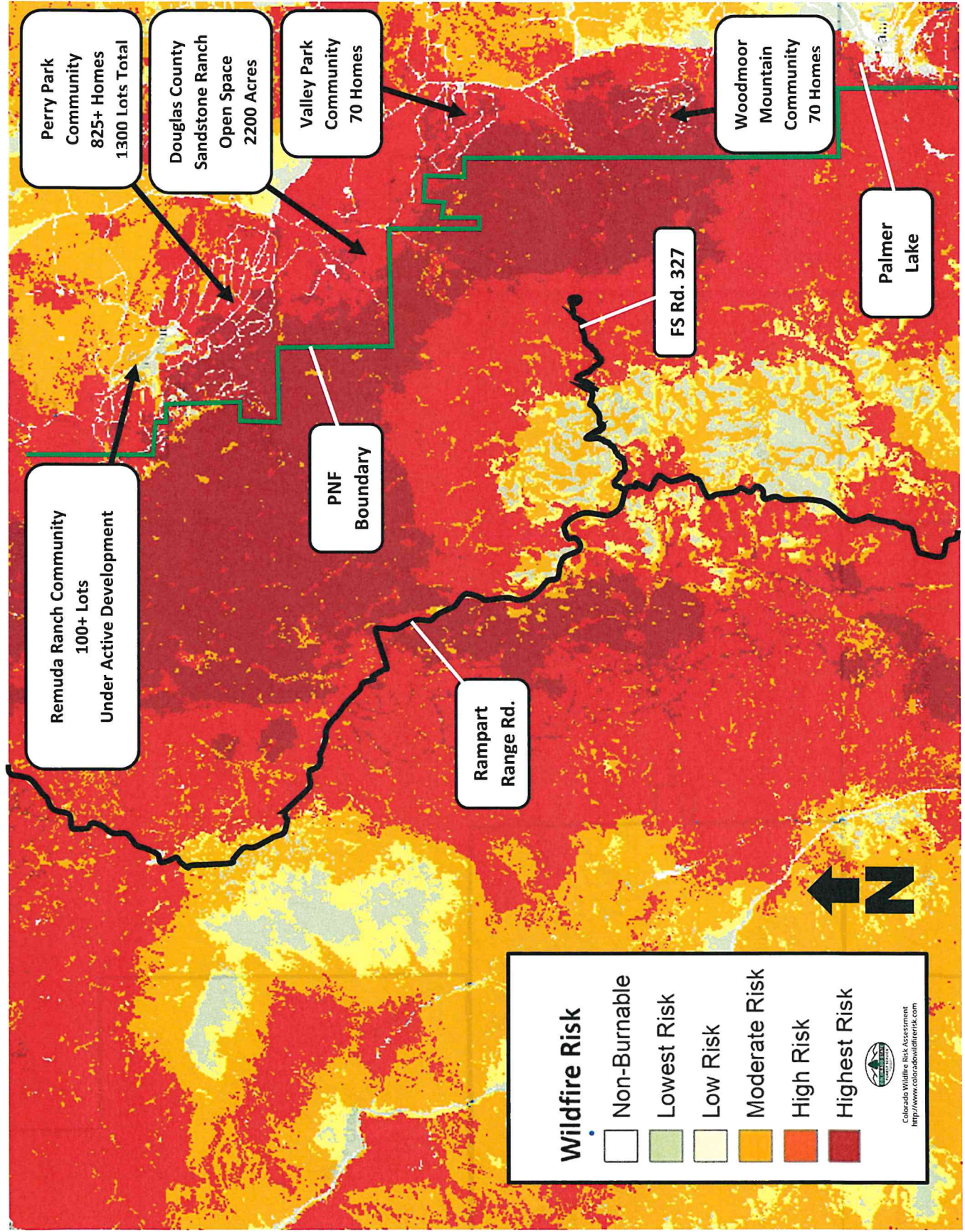
Randal Johnson  
Fire Marshal  
Larkspur Fire Protection District

A handwritten signature in blue ink, appearing to read "Randal Johnson", is written over a horizontal line.







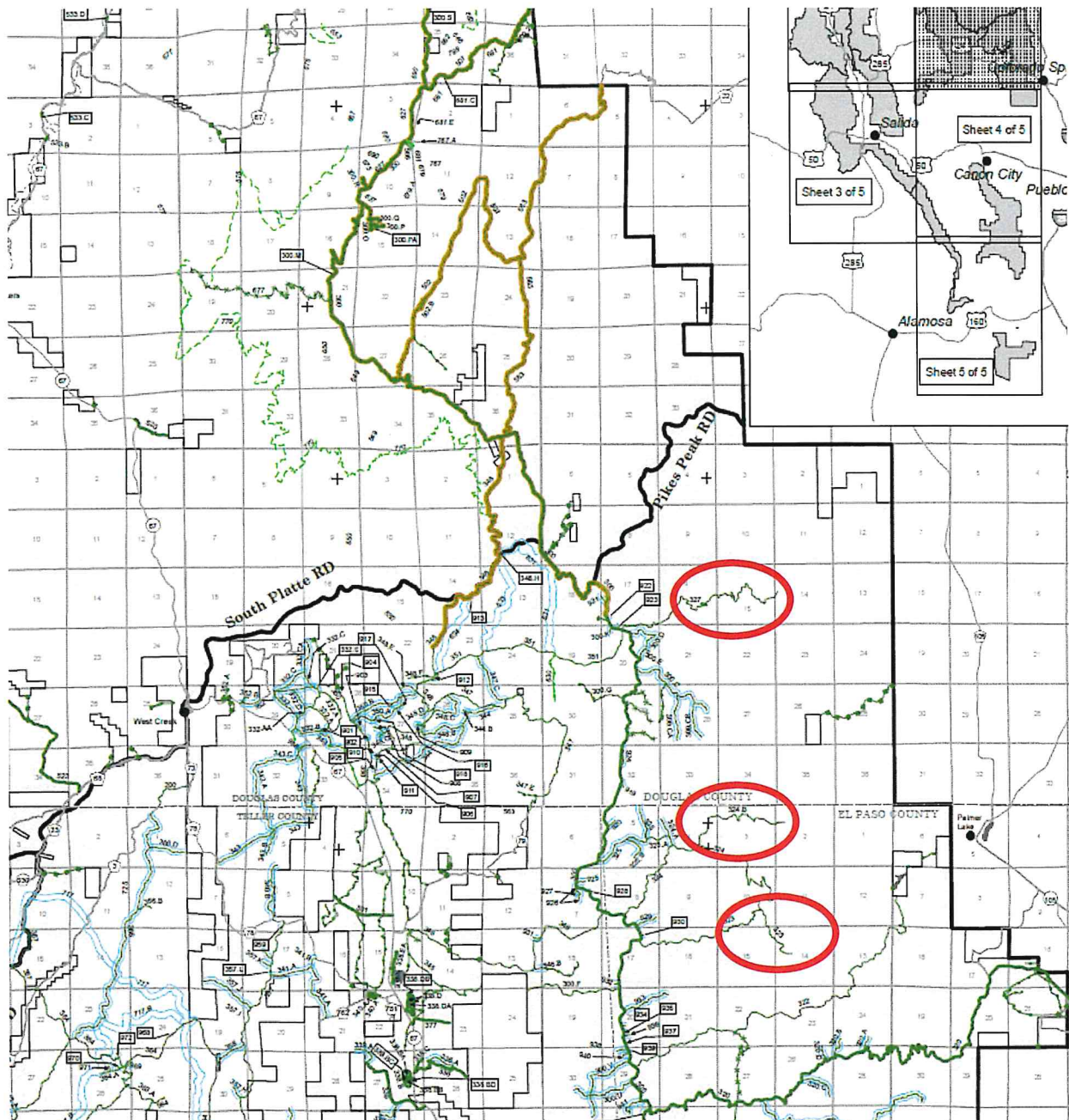




## DEIS-EIS Alternate A

- No Action on any roads/trails – leave as is

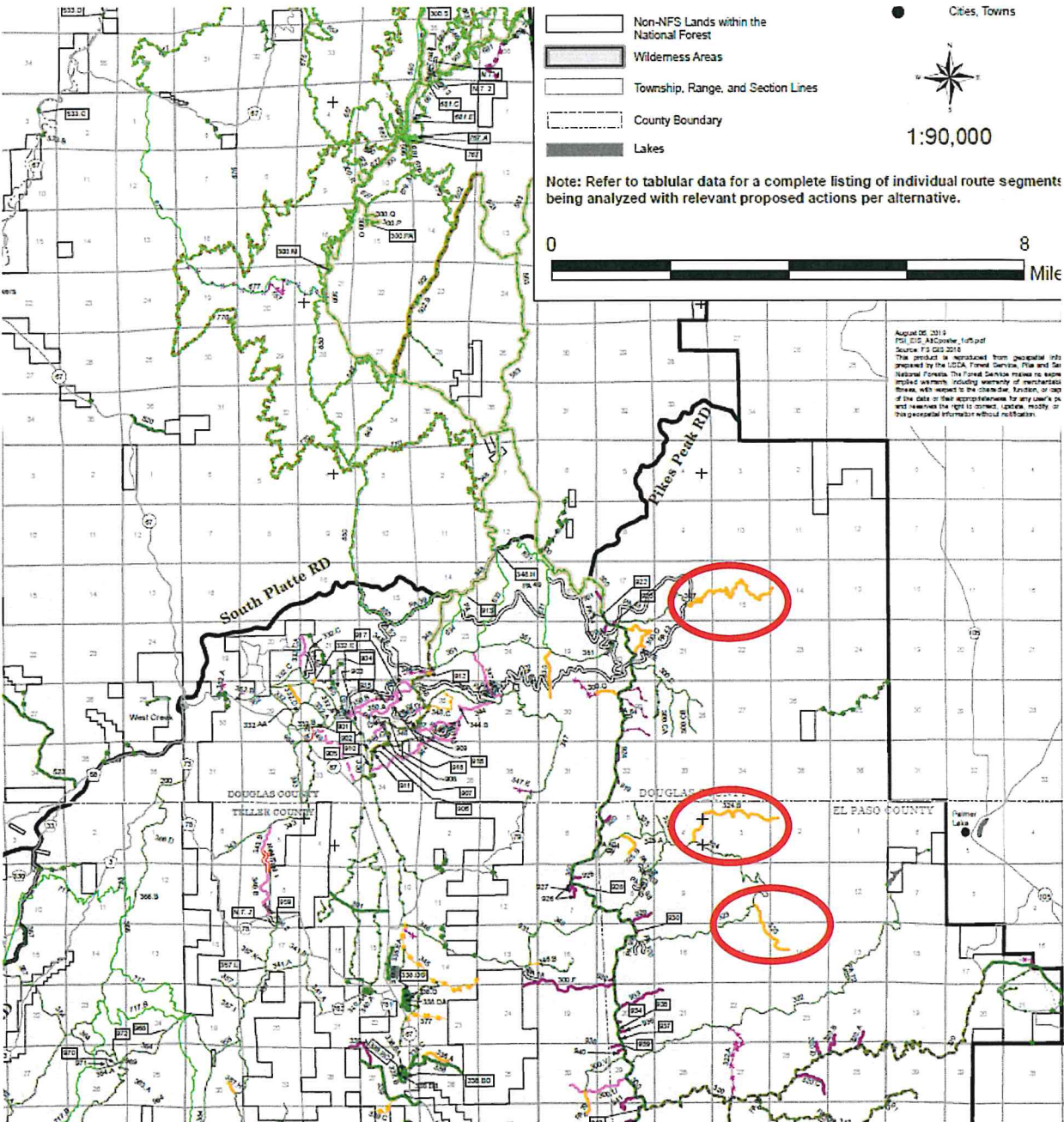
### Alt A Map



**DEIS-EIS Alternate C**

Forest supervisor's proposed action

**Alt C Map**





## Roadless Areas

