

**King Gulch Property Owners Association Comments on the  
Dispersed Camping Management Project**

Submitted via the Project website

March 13, 2023

Ms. Beth Davis, NEPA Planner  
Mr. Perry Edwards, Salida District Ranger  
USDA Forest Service  
5575 Cleora Rd.  
Salida, CO 81201

Dear Ms. Davis and Mr. Edwards,

Thank you for the opportunity to submit these comments regarding the Notice of Proposed Action (NOPA) for the Dispersed Camping Management Project (“Project”). We also submitted pre-scoping comments on March 29, 2022.

**Background**

We represent the King Gulch Property Owners Association (King Gulch POA). The King Gulch POA is an umbrella non-profit association for the Pinon Ridge Estates subdivision, which is accessed from the end of County Road 110 southwest of Salida. Access to Forest Road 124 (FR 124), also known as Sand Gulch Rd, is through our subdivision, which is in the central part of Section 13, T 49N, R 8E. [Note: NOPA Appendix B erroneously refers to this as “Kings Gulch Road.”] The portion of this road across BLM land from Sand Gulch Dr in our Subdivision is signed and mapped as BLM Route 5668B.

Pinon Ridge Estates is comprised of 22 lots. We currently have 14 homes with 25 full-time residents and 7 part-time residents. Several more homes are under construction.

We are surrounded on 3 sides by BLM land, with Forest Service land about ½ mile south of our neighborhood. Our residents frequently hike and bike on nearby trails as do many Chaffee County residents and visitors. Because of our homes, we are very concerned about the possibility of a major forest fire occurring in the area.

Our community has been working diligently over the past several years to address the threat of wildfire. The Decker Fire and the fires that raged across northern Colorado the past few years have emphasized the danger of wildfires to us. Our community is working to proactively address wildfires in our area – to address human health and safety as well as land and ecosystem health. We have actively supported the Methodist Front Project, participated in Chaffee Chips, become a Firewise Community, and expanded the defensible space around our homes. Last year, we also submitted comments in support of the Forest Service’s Methodist Mountain Vegetation Treatment Project #55245 (Vegetation Treatment Project), which is also near the end of FR. We support the Vegetation Treatment Project because thinning and removing conifers and pinon-juniper, especially in the western portion of that project area near the end of FR 124 would not only improve wildlife habitat and watershed health but help minimize the risk of wildfires near our homes.

### **Input to the Project**

Overall, the King Gulch POA fully supports the Project's proposal to increase management of vehicle-based dispersed camping (VBDC) on Forest lands. We are especially pleased to see the Forest Service recognizes the concern about the "*risk of wildfire from abandoned or escaped campfires associated with VBDC activities*" (Table 3, p. 9 of pdf).

In our pre-scoping comments, **we requested that the Forest Service designate all areas along Forest Road 124 as No Camping** for the following reasons:

- FR 124 ends near the Rainbow Trail in Sections 23 and 26, T 49 N, R 8 E. This area encompasses the upper end of Sand Gulch valley between the lower ridge lines of Poncha Mountain to the west and the western ridge line of Methodist Mountain to the east. The prevailing winds from the west/southwest funnel between these ridge lines and accelerate into the upper end of the valley, creating an increased wind load against the eastern slope of the valley. The elevation of the area in question also contributes to higher winds being more common because of the high temperature differences between the Salida valley floor and the cooler mountain air just above the area in question.

While mastication for fire mitigation was done on the BLM portions of the Sand Gulch valley floor north of the Forest lands along FR 124, the area on the Methodist Mountain flank where the wind loading is the highest remains densely populated with pinyon pine and juniper. A campfire, even when attended, could become a high-risk situation under the common moderate to high winds in the area. Our community is only a mile northeast of this area, directly downwind and in the path of any wind-driven fire.

- Dispersed camping in this area would directly conflict with one of the goals of the Vegetation Treatment Project in that same area – i.e., to improve deer and elk winter range. Also, allowing increased risk of wildfire from dispersed camping would jeopardize other Vegetation Treatment Project goals – to improve forest resiliency and watershed health, and minimize wildfire risk.
- Prohibiting dispersed camping along FR 124 would help protect nearby communities including our neighborhood, nearby recreational trails, and overall human health and safety. Those outcomes are consistent with the Forest Service's launch of "*Confronting the Wildfire Crisis: A Strategy for Protecting Communities and Improving Resilience in America's Forests*" (<https://www.fs.usda.gov/managing-land/wildfire-crisis>).
- Fortunately, only a limited amount of dispersed camping has occurred in this area in the past due to the very rough access road, limited hunting opportunities, and lack of water. Thus, designating No Camping in that area now would not deprive regular campers from returning to the area. However, the road was somewhat improved during the Decker Fire and visitation is increasing, so now would be a good time to prohibit future camping.
- This is a relatively short section of road in the Forest, about 1.5 miles long. It begins at an elevation of 7,700 feet and climbs to 8,900 feet with a continuous grade. There are no existing level spots along the road suitable for dispersed camping except for the end of the road near the

Rainbow Trail. Thus, a very small area on the Forest would be closed to dispersed camping.

- The BLM is planning to only allow camping in designated locations along its portion of the access road to FR 124. Having inconsistent camping regulations on the adjacent Forest lands would be confusing to the public.

While we are pleased to see that FR 124 is **not** highlighted in yellow on the map labeled Proposed Vehicle Based Designated Camping, we are very disappointed that dispersed camping would still be allowed in this area. Although the Proposed Action describes that adaptive management would apply to this part of Methodist Mountain (Appendix B), that is not enough to protect our homes from a wildfire caused by an escaped campfire. Under Fire Management in Table 3, the Management Trigger to more carefully manage dispersed camping in the area is: “An increasing trend in human-caused, camping related incidents in one geographic area in a two-year period.” All it takes is one escaped campfire in that area, which is upwind from our homes to destroy our neighborhood. Waiting to see an “increasing trend” in this particular location before taking action is entirely inadequate.

### **Summary**

We appreciate the opportunity to submit comments as part of your Project development process. Again, we respectfully reiterate our request to **designate all areas along Forest Road 124 as No Camping**.

Please feel free to contact us with any questions you may have.

Sincerely, King Gulch POA

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