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Organization: Boulder County Parks and Open Space
Title:
Comments: Boulder County comments on Forsythe II

Please find comments regarding the Forsythe II Project Proposed Action attached and a request for more time to provide additional comment.

Thank you.

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January 29, 2016

Ms. Sylvia Clark District Ranger
Boulder Ranger District 2140 Yarmouth Avenue
Boulder, CO 80301

RE: Forsythe II Project Proposed Action

Dear Ms. Clark:

Thank you for the opportunity to provide input on the Forsythe II Project Proposed Action. The intent of these comments is to address the components of the Proposed Action related to the potential emergency egress options from the Big Springs subdivision to Magnolia Road. Additional comment from Boulder County regarding the forest treatments is forthcoming under separate cover.

Boulder County supports the desire and need to identify and develop an emergency egress route or routes in the Big Springs subdivision area in support of life-safety goals in the event of a fire or other emergency. The Proposed Action identifies two potential egress alignments, Doe Trail and Wildewood, that utilize in whole or in part segments of existing trail on Forest lands and on Boulder County open space property. The county has also received a copy of the Application for Transportation and Utility Systems and Facilities on Federal Lands that was made by the Town of Nederland in the Fall of 2015. County staff from Parks and Open Space, Road

Maintenance, and the Office of Emergency Management attended a site visit in November of 2015 with staff from USFS, Town of Nederland, and the Nederland Fire Protection District to tour and discuss the two proposed routes.

Boulder County does not own any lands that would be affected by the Wildewood route. And, based on the 2015 site visit, no significant natural resource concerns were identified that would dissuade the county from supporting use of this corridor as an emergency egress route.

The Doe Trail proposal would, however, primarily affect county-owned open space lands. Nederland's application notes that 0.62 miles of the route are on open space and only 0.1 miles are on Forest lands. These open space lands, known as Reynolds Ranch, were acquired using the Open Space Sales Tax Fund. Lands acquired with Sales Tax Funds are bound by the voter-approved resolution for use exclusively for open space purposes. As such, the county through the Parks and Open Space Department strives to manage, maintain, preserve and enhance resources on such property for their open space values including wildlife habitat and migration corridors, wetlands and riparian areas, and rare plant areas, as well as for passive recreational uses such as non-motorized trails.

Facilities that are not considered an open space use by this definition would require a disposition of land process. This is especially so in the case of this proposal where the intensity of the development required to construct a safe and sustainable egress route in this location, while potentially feasible, would create impacts that degrade the sensitive open space resources known to be in the corridor further diminishing the open space values.

Among the notable resources present is a non-motorized trail that runs the length of the drainage. It is likely an old mining road/route; however, it has been managed as a trail since the acquisition in 1995. Significant natural resources are well-documented in the drainage as well. Resource inventories and evaluations of the property conducted in preparation for the Reynolds Ranch Management Plan in 1999 and updated in 2012 document their presence. These resources are also designated in the Environmental Resource Element of the Boulder County Comprehensive Plan (the Comp Plan). These designations are commonly used by the county in the evaluation of Land Use proposals that come before the Board of County Commissioners. In addition, much of the lower half of the drainage is designated as a Sensitive Natural Resource in the Reynolds Ranch Management Plan (1999). All these designations would be given serious consideration in the upcoming management plan update.

Particular resources and BCCP designations include:

- *The corridor is known to provide nesting and fledging habitat for sensitive species including Northern Goshawk and Long-eared Owls, both of which are designated as Species of Special Concern;

- *The area is well known as a Wildlife Migration Corridor for elk and designated as such on the Critical Wildlife Habitat map;

- *Stands of large diameter trees (Englemann spruce and Douglas-fir) are also known to be present with the oldest more than 140 years old; these stands are designated as a Significant Natural Community; and,

- *At the lower end of the drainage, while not yet inventoried as such, plant communities have riparian and/or wetland characteristics, particularly near the access point from Doe Trail, the road from which the egress would be accessed from the subdivision. Wetland and Riparian Areas are another Comprehensive Plan designation.

Given the concentration of sensitive natural resources in this drainage, and the fact that the property was acquired by the county to preserve these open space values and resources, we believe that the drainage is not a suitable location for the egress use. While we appreciate the Town's effort to propose a solution that seeks to

harmonize with open space environment, we believe that such a facility would have a substantially negative effect on the open space values present in the drainage. Just looking at driveways in the immediate area that traverse similarly steep side slopes, it is evident that a 12 foot wide drive requires a disturbance in excess of 30 feet in width, erosion and sedimentation on the side slopes is an on-going maintenance dilemma, and it is a challenge to establish and retain native vegetation on those side slopes. The addition of pull-offs along the drive would only increase the footprint of the disturbance and exacerbate impacts.

We believe that there are alternatives to the Doe Trail alignment that can continue to be pursued if the Wildewood alignment cannot be implemented and/or if the life safety needs are not otherwise satisfactorily addressed. We are committed to further collaboration toward meeting the life safety goals for the neighborhood. Alternatives could potentially consider lands on the open space property where far fewer impacts to sensitive resources would result and where trail use may also be suitable without increasing habitat fragmentation in the area.

Additionally, Boulder County is formulating comment related to specific forest treatment actions outlined in the Proposed Action in addition to related wildlife management concerns. We have heard from a number of concerned community members in the past few days about the proposal and would like some additional time to consider their input in our comments. We respectfully request additional time to provide this feedback and intend to provide it within the next 14 days.

We appreciate our on-going collaboration in an effort to best manage our local forest.

Sincerely,

Justin Atherton-Wood Resource Planner
Boulder County Parks & Open Space