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April 20, 2010

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

RE: South Rampart Travel Management Plan

To Whom It May Concern:

Thank you for the opportunity to comment on the proposed South Rampart Travel Management Plan. Douglas County Government understands the purpose and need for the revision. We support the effort and agree with the direction the plan is taking. 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. We applaud your diligence and effort both in the volume of work undertaken and the inclusion of the public and various stakeholder groups from the very onset of the project.

Douglas County Government has only a few comments and one minor request for change to the preferred alternative. 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 portion of FS Road 327 is shown as closed and rehabilitated. In response to a question at the March 10, 2010 meeting, FS staff said that if the road was closed and rehabilitated, it is likely that the roadless area boundary would be modified to encompass the areas closed. Douglas County prefers that this road remain open and that the roadless area not be expanded. The following paragraphs describe our reasons for this request.

This area of the National Forest lies just west of several residential communities including Perry Park, Valley Park, Woodmore Mountain, and Sandstone Ranch. The adjacent terrain is very steep and the forest is very dense. This area of wildland-Urban Interface (WUI) has a significant associated fire risk. 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. It was only the availability of ARRA grant monies that allowed this project to be completed. A great deal

more thinning should be done, but a number of factors frequently stymie those efforts. Those factors include steep terrain, limited access, proximity to residential areas, and roadless area restrictions, which increase the duration, difficulty, and expense of getting such projects approved and implemented. Closure of road 327 and increasing the amount of roadless area in this vicinity will further detract from our mutual ability to perform more treatment.

In addition to treatment, Douglas County also believes that this road will be an important access point for fire crews in the event of a fire in the vicinity. It is the only road that accesses that portion of the forest; no other road comes close to the area adjacent to these residential communities. This road could serve as a staging area for fire crews or the construction of fire breaks; there is no other option.

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 Douglas County in this area. For a number of years now, Douglas County has been working with Randy Hickenbottom 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.

Douglas 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. We have 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/Parial 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.

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 discuss partnering opportunities to improve and maintain Road 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.

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 and the consideration you have given our comments and requests. 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