



Date: December 21, 2020

Pike & San Isabel National Forests Motorized Travel Management (MVUM) Analysis

Submitted via web link: <https://cara.ecosystem-management.org/Public//ReadingRoom?Project=48214>

**RE: Comments and recommendations per the Pike & San Isabel National Forest Motorized Travel Management (MVUM) Analysis – Final EIS 11-6-2020**

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To Whom It May Concern:

With the acknowledgement that the Final EIS for the South Rampart Travel Management Plan is being finalized per the preferred alternative, a final decision will provide the direction by the United States Forest Service (USFS), through this public engagement process, to best determine the management direction to best maintain the management needs of the road/trail systems and lands of the Pike and San Isabel National Forests while meeting the mission of the USFS public's interest in water resources protection, recreation, habitat and economic sustainability of these lands. Colorado Springs Utilities (Utilities) respectfully submits the following information, comments, and recommendations to support this major undertaking.

Please note our analysis process was to review each alternative to identify the suitability of road/trail access that would provide access for water system operations and maintenance needs across the Pike and San Isabel National Forest. Each of those alternatives were listed in each specific comment as well as alternatives that were not feasible with noted roads to be decommissioned or restricted access. In general, our overall support is for Alternative C with some noted recommendations that should be addressed involving modification(s) to existing Utilities Special Use Permits (SUP)

The City of Colorado Springs, with a population of approximately 480,000, receives and delivers nearly 99% of its water supply through three major river basins: South Platte River, Colorado River, and the Arkansas River. Utilities water supply and storage system(s) utilizes several transmission lines, reservoirs, and other infrastructure located within the Pike, San Isabel, and White River National Forests. With respect to the South Rampart Travel Management Plan project area, Utilities owns, and through multiple special use permits, operates a system of water transmission pipelines, tunnels, and reservoirs for the delivery and storage of source water supplies.

Understanding of the need to comply with the Travel Management Rule and to balance access, motorized and non-motorized use with public safety and for the protection of natural resources, Utilities seeks to participate in this process for a balanced management plan while also keeping with our mandates to protect the water resources and assets as owned by the City of Colorado Springs. Per review of the South Rampart Management Plan proposal, Colorado Springs Utilities water supply operations, and with consideration to the public input from the project scoping meetings, Colorado Springs Utilities has prepared the following comments.

1. Utilities can support Alternative A and C. Alternative A is preferred given it has no seasonal closure constrain access to USFS Road 322 that allows for access the Mount Princeton Communication



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Tower, which is critical to the operation of Colorado Springs Utilities and the City of Aurora's trans-mountain water supply. Under Alternative C, the seasonal closures will necessitate modification to the identified section marked for decommissioning to provide year-round administrative access to the tower by all vehicles, including snowcat treaded vehicles or snowmobiles, Utilities supports Alternative C as our preference, but will necessitate these conditions knowing we'll have minimal impact during the seasonal closure. While it would be infrequent visits during the seasonal closure, emergent access for site repairs needs to be established with the USFS for the Homestake Water Project that serves nearly million Coloradoan's living in Colorado Springs and Aurora.

2. Utilities can support Alternatives A and C, as each alternative retains access to the Dick's Peak Communication Tower located at the end of USFS Road 261.A. However, Utilities' preference is Alternative C, as it provides the best option to retain the road as accessible to all vehicles with the least restricted manner of having seasonal closures impede access. If Alternatives A or C for access to USFS Road 261.A is not approved under the final EIS, Utilities will still need to negotiate reasonable access to the communication tower located at the top of Dick's Peak full access to 261.A. Prohibiting access to this communication tower is vital to the operation of Utilities' and the City of Aurora's water supply on a daily basis per the use of multiple SCADA systems.
3. Upon Utilities' review of the lower section of USFS Road 228, there is still a coded designation for decommissioning approximately the first mile of USFS Road 228 off USFS Road 226. Upon review of the draft EIS comment filed October of 2019, about this same mislabeling, we are uncertain of the actual legal definition of decommission roads on USFS property, as this does not correlate to the USFS response of our 2019 comments; whereby the USFS stated that USFS Road 228 will be converted to Administrative Use Only under Alternative C. If this is the case, we would like the verification as such, Utilities' could support Alternative C as our preferred alternative. It is imperative this correction be validated as USFS Road 228 is vital to our day-to-day Homestake Water Collection System for any communication tower system failures that could impact Utilities and Aurora Water's Homestake water collection system and transmission operations, along with several other entities for emergency communications associated with the Badger Mountain Repeater Site.
4. Utilities' can support Alternatives A, C, or D given each of these alternatives does not have a direct impact on Utilities' operations or access from Gold Camp Road up USFS Road 376 to Utilities South Slope Watershed access gate. However, Utilities' preference is Alternative C given the condition to least disrupt water operations, but curious to the noted change in "maintenance level" given Utilities is currently involved in maintenance of USFS Road 376.
5. While USFS Road 376 is not a contested road, Utilities does see advantages in reducing road maintenance costs, improving motorized vehicle safety, and reducing illicit activities occurring along USFS Road 376 by converting this road to Administrative Use Only with ongoing maintenance commitments by Utilities. Recognizing the use and value of USFS Roads 376.A and 379, these roads could remain accessible under Alternatives A, C, or D to provide for intended recreational outcomes from the PSI MVUM process.
6. Utilities can support Alternative A or C but has a strong preference to support Alternative C for maintaining USFS Road 379 accessibility to all vehicles and the conversion of 379.A to an Administrative Use Only for water system operation respective to Special Use Permit PPK100913 from the Stratton



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Reservoir Site up to Almagre Peak. The Stratton Reservoir Dam is a historic and valued cultural site and having this limited vehicle access would work towards greater preservation of the site. Additionally, Utilities recommends decommissioning USFS Road 379.C and included as part of Alternative C. USFS Road 379.C is being used in an illicit manner to gain illegal access to the South Slope Watershed by motorized vehicles. Given the slope and soil type of this road, it is being severely damaged by vehicles creating excessive erosion and gullying.

7. Utilities supports Alternative C, as this alternative maintains USFS Road 379 as an open road to all vehicles to access the Stratton Reservoir site. Utilities' is uncertain of the quality and accessibility of USFS Roads 370.C, 370.D, and 370.DA to provide feasible work truck access to USFS Road 379.A as well as USFS Road 379, which is the primary route Utilities uses to access the Stratton Reservoir site via 379.A.
8. Utilities cannot support Alternative B for decommissioning of USFS Road 370.G as this is our only access to the headworks of the Platte Rodgers Tunnel Inlet. Access is a must for routine operations and maintenance of the Rosemont Reservoir and water collection system. Utilities can support Alternatives A, C, D, and E, as they all do provide ongoing access to USFS Road 370.G for access to the tunnel headworks. However, Utilities strongly recommends, under our preference of Alternative C, that USFS Road 370.G be converted to Administrative Use Only under a modification of Special Use Permit PPK 128. Utilities is currently undertaking the road maintenance and is concerned with the illicit issues of camping and littering along the road as well as a restricted entry point to into Rosemont Reservoir Recreation area. Continued illicit and unsafe shooting practices, vandalism of reservoir/system infrastructure, and safety of Utilities personnel is of concern if 370.G is not converted to Administrative Use Only under the existing Special Use Permit PPK 128. Road maintenance responsibilities would be formalized under PPK 128 as necessary.
9. Utilities strongly supports Alternative C to convert USFS Road 372 from open to Highway Legal Vehicles to Special Use Permit access only. This change in use is heavily supported by Utilities for access to the outlet works of the Platte Rodgers Tunnel and Rosemont Reservoir Dam for operations and maintenance needs. Given the high volume of illicit camping, littering, vandalism, and illegal shooting which is threatening both public and Utilities personnel safety, it is paramount this road access be limited to Utilities, USFS, other land resource management agencies and private land owners requiring access from USFS Road 372.
10. Under Alternative E, road 408 would be considered eligible for decommissioning. Utilities is supportive of decommissioning road 408 above Montgomery Reservoir as it would further protect municipal watershed lands from resource and water quality degradation from heavy recreational use. Additionally, infrastructure associated to the operations of the reservoir would also be further protected from vandalism and other illicit activities common with vehicular access.
  - Decommissioning could be an appropriate alternative resulting from or in concert with further development of municipal supplies and storage at Montgomery Reservoir to minimize environmental and water quality impacts.
11. As a general statement, Utilities is well aware of the wildfire conditions on Pikes Peak and Rampart Range where critical water and electric resources and infrastructure are located. Through our collaborative partnership, Utilities wants the USFS to be mindful of critical roads for wildfire



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suppression response and forest management activities where roads are to be decommissioned and the timeline of decommissioning such roads to complete forest management work.

If you have any questions regarding the comments submitted or with regards to Colorado Springs Utilities' water system, please feel free to contact me.

Sincerely,

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