

El Paso County Planning and Community Development Department for a Special Use Permit for the additional principal use of a Recreation Camp (file #AL269)

Prepared by Stephen J. Spaulding, Consulting Forester, July 31, 2026

County Fire Warden

Under **C.R.S. § 30-10-512**, the sheriff of every county, in addition to other duties, **acts as the fire warden** of the county. This role includes coordinating fire suppression efforts for **prairie, forest, or wildland fires** occurring in the **unincorporated area of the county** outside the boundaries of a fire protection district, or when those fires **exceed the capabilities** of the district to control or extinguish

C.R.S. § 29-22.5-103 outlines the **fire department chief's** responsibilities:

- Managing wildland fires within the jurisdictional boundaries of the fire department that the department can control or extinguish.
- Using mutual aid agreements with neighboring departments for fires crossing or threatening to cross jurisdictional boundaries.
- Transferring wildfire suppression duties to the county sheriff with the sheriff's concurrence.
- Not seeking reimbursement from the county for expenses from their own apparatus, equipment, and personnel for wildfires on private property, except under specific provisions

Fire Protection Commitment

The property is not located within a fire protection district. As El Paso County has no fulltime fire response, it relies on the County Wildland Preparedness Plan (CWPP) for mutual aid assistance. This includes, but is limited to, the USDA-Forest Service, local Fire Protection Districts, and Volunteer Fire Departments.

Notably, there are several private residences located long Old Stage Road. It seems that none of these residences have any committed fire protection in place. As they lie within El Paso, it would appear they would need to rely on the CWPP for response and protection.

Not required for
residential uses on
individual unplatted
property

The subject property is located at the end of private property ownership as it borders land managed by the USDA-Forest Service. The location does not reasonably allow for annexation into any municipality or fire protection district.

Water Supply NFPA 1142

NFPA 1142 – Standard for Water Supplies for Suburban & Rural Firefighting identifies a method of determining the minimum water supply necessary for structural fire-fighting purposes in areas where it has been determined that there is no or inadequate water for firefighting.

The goal of the standard is to provide” sufficient water under typical firefighting conditions for the size and complexity of the building or structure being protected.” The standard assumes there is at least one structure in question, if not a few buildings that more resembles a subdivision. Hence, several sections in the standard are not applicable.

The largest structure currently found on the property is a garage measuring 30.3 feet by 40.3 feet and is approximately 25.5 feet in height. The garage is constructed with a non-flammable metal roof and siding.

What is the use of the garage?

My understanding is that this is for structural protection, based on the construction and use of the building, not related to subdivision

Are any of the existing or proposed structures sprinklered?



Photo 1. View of Garage structure from the lower end of the driveway. The west and south exterior walls can be reached well within the 150-foot requirement (6.3.4 B. General, 3 Access to Structures. ii.).

A second minor structure is in the parking area on the west side of Old Stage Road (see Photo 3). This structure is located near the cistern. It has a corrugated steel roof covering and wood siding. It is 6.75 feet wide and 14.75 feet long. It appears the current use is for miscellaneous storage.



Photo 3. Side of the storage shed. The blue arrow indicates the location of the water cistern.

A third and minor structure as well is located uphill and south of the garage (see Photo 4). It is a 10x12 foot Tough Shed. At present it has no stated use but is assumed to be for future storage.

show on site plan

show on site plan



Photo 4. A view of the Tough Shed. Note the positioning on and around the non-flammable soil surface.

Nonroad Access – Old Stage Road passes through the center of the property. Old Stage Road is a gravel surface road once it leaves the boundary of incorporated Colorado Springs. The road is seasonally maintained by the El Paso County Road Department. Due to the nature of road surface and limited maintenance, the road is susceptible to damage from storms, tree fall and rockslides which may retard passage.

The road may also become congested from recreational use, especially during the summer. These uses include bicyclists, off-road vehicle enthusiasts and sightseers.

I want to point out how proposed parking in the ROW is not allowed, and could also be a fire hazard for emergency access. So, this will need to be addressed on Site Plan, letter of intent, and waiver request.

6.3.4 WUI Areas

2) Road Grades – There are no roads to be constructed within the application site.

3) Access to Structures – The current driveway to the garage can reach to within hundred fifty (150) feet of an exterior wall and closer (see Photo 2). Both minor structures can be reached readily as well.

show on site plan for structures >200 sq ft

You need to discuss the proposed structures, their use, and applicability of the Fire Protection Code

6) Separation Between Structures – there are no other structures located within 50 feet of the garage and the garage is not located within twenty-five feet from the property line.

C. Wildland Hazard & Mitigation Plan

Note: A Wildland Hazard & Mitigation Plan was prepared and subsequently submitted to El Paso County Planning & Community Development Department on April 24, 2026.

The following comments are intended to provide added detail or context to the original plan.

Access, ingress, egress and evacuation - as expressed above, the property in question is bisected by Old Stage Road which is maintained by El Paso County. Other than seasonal disturbances or other unexpected events, the road is passable for most of the year.

Water Supply for Fire Protection –

There is no readily available water supply at present. Initial attack resources will carry their own supply. Assuming that the Broadmoor Fire Department is the initial respondent, fire apparatus consists of 1 – Type 2 Engines containing a total water capacity of 305 gallons.

There is also 1 – Type 6 Brush Trucks with a slide-in pump with a capacity of 75 gallons and a crew vehicle (Type 7) with a slide-in pump with a 10-gallon capacity.

There is a cistern of unknown capacity and flow rate. The concrete lid is 7x7 feet in size. The cistern would only need to be just over 8 feet in depth to contain a 3,000-gallon capacity. A visual inspection would suggest that the cistern could supply sufficient water to meet the code requirement. Colorado Spring Utilities has a lease that encompasses the location of the cistern. Discussions are being conducted to see if this is a feasible solution.

A third option would be to develop a pool of water on the property on the creek that flows along Old Stage Road. This unnamed creek is part of the Cheyenne Creek watershed. Approximately 1.4 square miles above the property drains directly into the creek.

A developed pool of water would need to be in proximity to the road itself. This would allow for refill capability by either a portable pump or dry hydrant. The landownership does have some level of water right, but this will require further and lengthy research to see if it is feasible.

Vegetation Management & Defensible Space –

The vegetation immediately surrounding the garage structure has been modified initially from construction of the building pad. Additional modification has occurred to allow for access around the structure and an outdoor living space (see Photo 5).

Broadmoor has stated they will not commit to fire protection. Please revise

If this is the proposed water supply for protection, please provide letter from Colorado Springs Utilities stating as much. Water Use Agreements. If a private water supply source is to be used, a legal agreement establishing access to and use of the water source is required.

You can't pull water from a creek in Colorado just because it flows through your property. Please provide court decreed water right for diversion if this is the proposed water supply for fire protection.



Photo 5. *The view from the east edge of the living space back towards the garage. The distance is approximately 75 feet. This would represent Zone 1 (5-30 feet) & 2 (30-100 feet) as it relates to Defensible Space*

Campfires

This all needs to be reflected on the site plan

The special use permit request is to allow for recreational camping on the property. This initially appears to be a hazardous use. However, based upon existing recreational camping on adjacent federal land, this may be a preferred choice.

Most camping uses eventually include having a fire. One of the incidental benefits of the requested use is the presence of staff on the property. These individuals check clients in, monitor activities during their stay and perform checkouts, which would include visiting the campsite to ensure any fires are extinguished.

Federal campsites, either formal or back country, do not have this level of supervision. Continued reduction in the Forest Service budget has resulted in reduced patrols within the

Are they living in the home? Are the visits to campsites daily? Please provide more details on employee oversight at the campsite

These are recommendations. What of the Report is being implemented?

Pike Peak Ranger District. This situation resulted in the Teller County Sheriff's Office voluntarily assuming this role on federal lands in their jurisdiction.

The campsites, there are sixteen noted on the site development plan, have a steel ring installed as a campfire pit (see Photo 6) . This step reduces the risk of a smoldering fire escaping. In addition, a fire extinguisher and pointed shovel are supplied at each occupied site.

As each campsite is used, the amount of fine fuels readily available to burn next to the fire pit are compacted into the soil. This result leaves a surface fuel that will not readily burn.

There are other fire safety recommendations that can be found in the Wildfire Hazard Report (March 2026).



Photo 6. An example of a steel ring used in a fire pit. Note the relative absence of fine fuels around the fire pit. Firewood is stacked over ten feet away.

Is this 10 ft distance based on any existing standard?

Structure Hardening & Defensible Space Requirements –

As discussed above, the garage structure is constructed with a metal roof and siding. There is no rain gutter installed that would provide a source of fine fuels that could allow a fire to enter under the steel roof. There is no additional structure hardening required at this time.

Zone 0 is 0 to 5 feet from the structure to be protected. It is the zone of the heaviest vegetation management, if not complete removal. The north side of the structure has had all vegetation removed for a length of 15 feet (see Photo 6).

The south side of the garage structure has had complete vegetation removal from 11 to 12 feet (see Photo 7). Further mitigation is occurring on the slope above the defensible space.



Photo 6. View along the south side of the garage structure. The distance to the tree line ranges from 15 – 16 feet.

Live green trees should not be removed in this location unless necessary for forest health or the risk of falling. The intent is to retain as much screening as possible to keep a level of privacy from traffic on the road.



Photo 7. This represents the view from the northeast corner of the garage forward to the northwest corner. Additional trees uphill from the structure are being removed to prevent flames from touching the structure.



Photo 8. The View from the back entry of the garage. Note that firewood is not stored in proximity to the structure. This is in accordance with Firewise recommendations.

Ignition Potential & Historical Wildfire Behavior Patterns

There is always the potential for ignition for wildfire. It should be noted there are many inputs that must come together to create a condition for fire to spread and grow. The Colorado Wildfire Risk Assessment Portal prepared a summary report that indicated there is a high annual probability of any location burning due to wildfire.

Interestingly, the Burn Probability rating of high appears somewhat misleading. The assessment provides a listing of actual ignitions by year. Focusing on the vicinity to the site, there are very few reported ignitions. The period covered by the assessment is 1992 through 2020. This low number of ignitions could be attributed to a lack of reporting or a public response to wildfire awareness. However, based upon the amount of traffic passing through, it would seem reasonable to see many ignitions over this time frame.

You should really make the full argument here, pulling details from these reports if needed

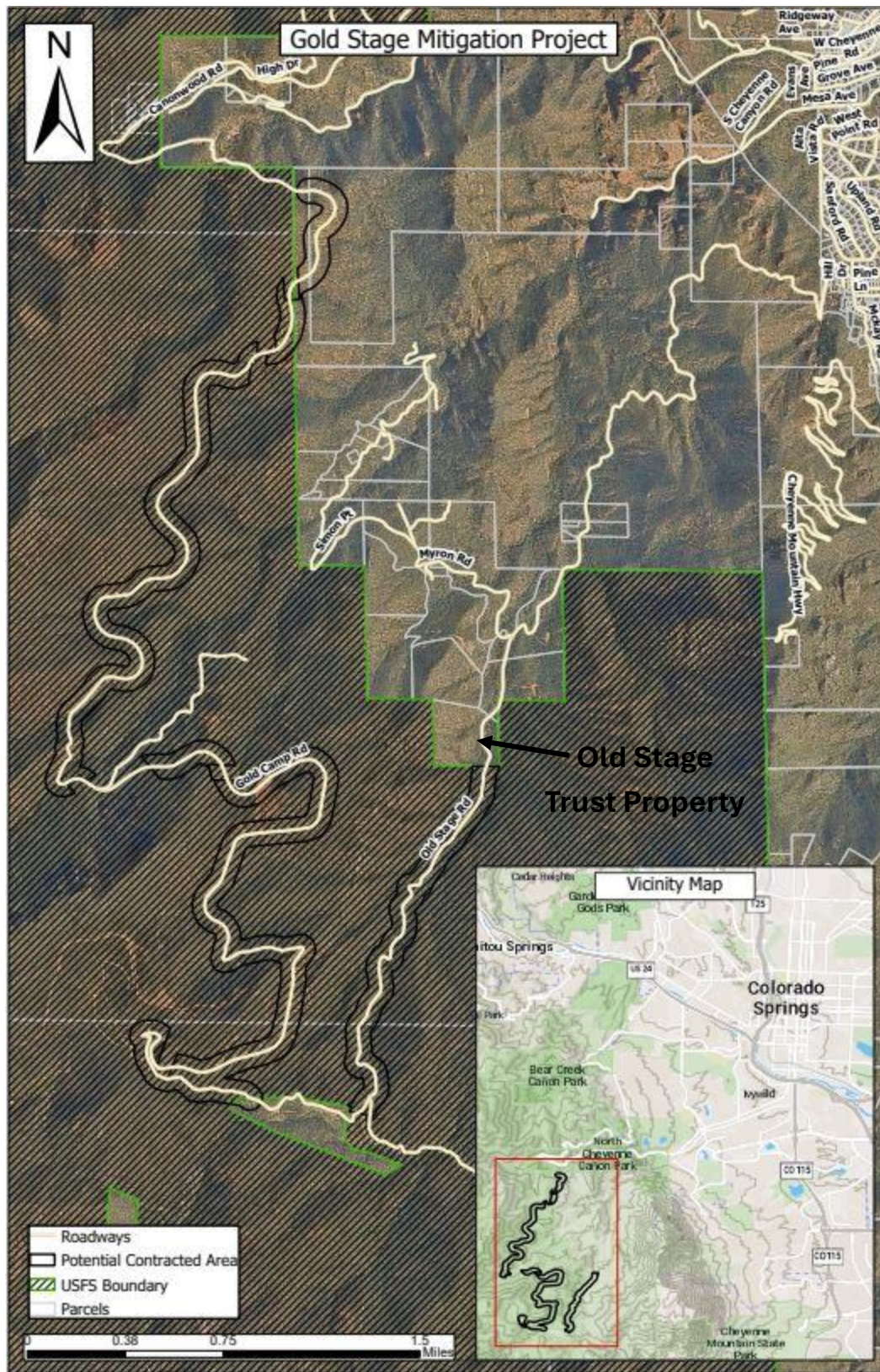
More information on both issues was addressed in the Wildfire Hazard & Mitigation Report (March 2026) that was submitted for the special use application. The summary should be available as well.

The area does have a wildfire history. Most notably, the Stable Fire burned in January of 1950, over 75 years ago. It was the most destructive wildfire at that time with 9 fatalities and reaching over 28,000 acres in size. Even though there have been extreme fire weather conditions since then, the Old Stage Road area has not experienced a large fire event. This shows that an ignition must occur at the right time, under the right circumstances and in the right location all at the same time.

Other Factors

Since the first hazard report was prepared, a partnership agreement between the Colorado Springs Fire Department and the USDA-Forest Service was agreed upon. The goal is to treat 200 acres, initially, to reduce wildfire risk. The project extends along the Old Stage Road and Gold Camp Road corridor (see map below).

As the Old Stage Trust property is located adjacent to the treatment area, the work performed will positively affect the risk of fire spread. A map produced by the Colorado Springs Fire Department is included here.



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EDUCATION: Graduate - Michigan Technological University
Houghton, Michigan
May, 1976; B.S. Forestry, minor in Forest Ecology

CAREER HISTORY: Forestry & Landscaping Consultant (1995 –)

- Forest Management
- Insurance & Damage Appraisals
- Wildfire Hazard & Mitigation Studies
- Landscape Plan Review
- Reclamation & Restoration

Land Program Director, Palmer Land Trust, Colorado Springs, CO
(2007 – 2009), Responsible for working with private landowners in voluntarily placing conservation easements on their property.

Assistant District Forester, Colorado State Forest Service,
Woodland Park District (1978 to 1995)
Recipient of Program Excellence Award, Trees for Conservation
Program, 1990; Single Resource, Wildland Fire Suppression:
Division/Group Supervisor

President, Ute Pass Christmas Trees, Inc.
Wholesale & Retail Christmas tree business (1984-2006)
ADBA: Steve Spaulding, Forestry & Landscaping Consultant (1995)

PROFESSIONAL AFFILIATIONS/INVOLVEMENT

- * High Altitude Revegetation Committee
- * Technical Advisor to Governor's Mountain Scar Commission
- * Ex officio of Board of Trustees - Green Mtn. Falls, CO
- * GreenSprings Committee Person; Former Chairperson
- * Technical Advisor to the Colo. Mtn. Reclamation Foundation
- * Society of American Foresters
- * Former Board Trustee – Palmer Land Trust

Clientele

Over the years, forest consulting services have been provided to private landowners from all over the state of Colorado. Projects have varied from simple sick tree calls for residential homeowners, corporate clients with complex regulatory submissions and long-range planning documents for municipalities such as the City of Colorado Springs. The following list is a snapshot of clients.

Diamond Shamrock – Elbert County – Pipeline Mitigation Plan

NES, Inc. – Colorado Springs - multiple projects per county planning subdivision requirements, Pineries Open Space

YMCA of the Pikes Peak Region – Deckers, CO – Wildfire Damage Stabilization

Classic Companies – C. Springs - multiple projects per county planning subdivision requirements

City of Colorado Springs – P&R Department – Blodgett Peak Open Space Forest & Health Management Plan (2006), Austin Bluffs Open Space

The Broadmoor – Strawberry Hill Management Plan

Santa's Workshop – Cascade – Wildfire Mitigation Project

Petrogulf, Corp. – Denver – Damage Appraisal

Hitch Rack Ranch – Wildfire Hazard Report