



Tri-Lakes Land Use Committee / El Paso County, Colorado  
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Raimere Fitzpatrick, Project Planner  
El Paso County Planning Dept.  
2880 International Circle Suite 110  
Colorado Springs, Colorado 80910-3127

Re: Forest Lakes Phase II, PUD Amendment

April 16, 2018

Dear Raimere,

Thank you for this referral. The Tri-Lakes Land Use Committee reviewed the above revised PUD Amendment request. As you know, the site lies within the Twin-Valley Sub-Area. The site adjoins platted subdivisions to the north and south and National Forest to the west. Those subdivisions are zoned RR-5 and platted in 5 acre lots.

In part, the Twin-Valley Land Use Scenario in the 2000 Update has this to say: .....  
*"This sub area should remain primarily rural residential with lot sizes averaging five acres exclusive of roads and tracts not devoted to open space areas. Large lot clustering options; utilizing minimum 2-1/2 acre lots should be considered only if there is strict adherence to this overall density approach and if adequate mechanisms for implementation are available" .....*  
*"Regardless of its location, all development within Twin Valley should be designed in a manner that is especially sensitive to preserving the natural visual character of the area."*

The applicant notes in their Letter of Intent that they believe an increase of approximately 100 lots within the buildable area of Phase II complies with the intent of the Tri Lakes Plan because the Forest Lakes development is colored on the Concept Plan to indicate "Medium Density". As noted above, in the Land Use Scenario discussion portion of the plan, that is not the case. Recalling the context within which the Plan was discussed and completed in the late 1990's, the Medium Density shown in Forest Lakes was simply a recognition that it already had approval for 466 lots on 822 acres, i.e. notably more dense than the surrounding subdivisions, and notably less dense than what is currently approved.

Other than providing the owner and developer with additional revenues, it is difficult to justify adding 100 lots of the size found and normally appropriate in city centers to this area. True, 100 additional homes would be available for purchase but is this the best place for them? Perhaps not. Benefits to the residents of the County appear minimal at best and benefits to the immediate community of Twin Valley even less so. Infrastructure maintenance will cost residents more than taxes provide, burdening all. The existing internal trails and open space are a benefit to the immediate residents but of less value to the community as a whole and are not materially bettered by this proposal. Access to the National Forest already exists in the form of Mt. Herman Road.

Over the last decade we have experienced a steady deepening of drought conditions in our area. This is not a new or unusual phenomena, rather it's one that is cyclical and has been happening for millennia. This has many implications but the most obvious is wildfire occurring anywhere in the Wildland Urban Interface - which all of Forest Lakes lies within. We have seen what happened in the Hayman Fire, The Waldo Canyon Fire and the Black Forest Fire. To think it will not happen in Forest Lakes is simply wishful thinking.

The applicant's Wildland Fire & Hazard Mitigation Plan identifies these dangers and discusses the circumstances that might occur if wildfire were to start, for instance, at the west end of Bristlecone Lake. Where would it spread? Westerly, Southerly and Northerly, all uphill. Rates of spread are given presuming no wind other than the normal daily upslope that occurs with daytime solar heating. What is not discussed is the fact that a fire beginning there with a wind behind it could quickly trap all the residents in Phase II because the only road out would be within the fire. Of course, fire might be wind driven in any direction and can cause spot fires in advance for up to a mile.

The Mitigation Plan proposes that customary techniques should be implemented. The primary one identified is called Defensible Space or the removal of vegetation within the first 30 feet of a home. Then thinning of vegetation in the next 30 feet and so on. Unfortunately, this density increase places another house on each side within that first 30 feet. And another. And another. Unless homes are all of highly fire resistive construction and vegetation virtually eliminated, this only reconstructs conditions just like or worse than those in Mountain Shadows where the Waldo Canyon fire was so devastating.

Additionally there is concern about the roadway network in the area. It is simply insufficient for this level of development. Lindbergh Road, running north from Mesa Top Drive is gravel, designed for 200 vehicle trips per day (the amount generated by 20 houses) and well above that now. The only other egress, and the primary one from the area, is West Baptist Road. West Baptist Road now has a bridge over Monument Creek and the railroad. Unfortunately it is only one lane each way. Of additional concern is the fact that 90 or so 5 to 700 acre properties along Hay Creek Road enter West Baptist just before the bridge. And then the combined traffic crossing the bridge empties out into a one lane round-about intersecting Old Denver Highway with a radius permitting speeds of perhaps 15 MPH. Of course, Old Denver Road also enters the roundabout 90 degrees north of West Baptist.

While the traffic analysis suggests these connections can operate satisfactorily under normal conditions in the immediate future, it does not address the circumstances that would occur if area residents had to leave in an emergency - say if a wildfire sparked in the area. Many of the Hay Creek residents have livestock. The idea of all this traffic attempting to merge and cross the bridge and then negotiate the round-about while emergency equipment comes at them is disconcerting. Not everyone reacts calmly during emergencies and these bottlenecks are not helpful.

The "mini-incline" that has been proposed is just that- a thought on paper without any indication of its being part of the development, who would maintain and insure it, etc.

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Regarding water resources, we would urge in the strongest terms that no development, this included, be allowed to proceed without an engineer's report on the source and 100 year maintenance of the water, with professional liability or performance bond for the engineer and developer and their respective assigns attached to the property.

In summary, despite the developer's comment, the Tri Lakes Comprehensive Plan does not support increasing the number of dwelling units. Clustering is recognized as a potential tool but nowhere are lot sizes this small identified as compatible. The map term "Medium Density" simply recognized the approved density in 2000, it does not provide justification for any increase. In addition, there seems little benefit available to residents of the County for such an increase. And who will pay for the already required improvements to Lindbergh Road? Who will pay to widen the existing bridge? And who will replace the round-about or create a pair of emergency lanes through the middle of it? What advantage arises from the increase of 1000 vehicle trips per day that 100 homes bring? Wildfire concerns are real and could be at least partially mitigated by providing a new fully equipped on site fire house. But one is not proposed. An elementary school is, but not a fire house. Finally, additional dwelling units in the middle of this large existing RR-5 area does nothing to enhance their life experience.

Respectfully Submitted,



JOHN F BENDER, PE  
TRI LAKES LAND USE COMMITTEE