

City of Boulder
Planning and Development Services
P.O. Box 791
Boulder, Colorado 80306-0791
Attention: Ms Elaine McLaughlin, Senior Planner

November 28, 2017
via e-mail

Regarding: Site and Use Review for 311 Mapleton
Wildland Fire Hazard: Need to protect applicant site under BVCP and Public Safety

Dear Elaine,

The City of Boulder has adopted the Boulder Valley Comprehensive Plan (BVCP) by resolution. Section 3.16 of the 2010 BVCP defines **Hazardous Areas** as follows: "Hazardous areas that present danger to life and property from flood, forest fire, steep slopes, erosion, unstable soil, subsidence or similar geological development constraints will be delineated, and development in such areas will be carefully controlled or prohibited."

The current application for development at the 311 Mapleton site is for a large congregate care facility. The 311 Mapleton site has frequent modern experience as a wildland fire hazard, and is situated on Boulder's designated "Wildland Urban Interface" in the North Central Zone of "The City of Boulder Structure Protection Plan 2012."

The 311 Mapleton property was subject to mandatory evacuation from wildfires in March of 2017 and twice during 2010. Please reference the Guest Opinion (copy attached) which I wrote for the Daily Camera on April 2, 2017.

We believe that the City must exercise its obligations to protect our public safety in the Site and Use Review process. BVCP Section 3.16 provides City discretion **to prohibit** the proposed congregate care development on this Hazardous Area (as defined by BVCP). The site is subject to frequent forest fire hazards and evacuations, compounded by the difficulty of fire protection due to steep slopes and lack of road access at the west and north sides of the property. Reference to these unique site hazards can be found in the Boulder 2012 Structure Protection Plan under the North Central Zone tab.

Boulder's Structure Protection Plan is based on international fire code. **For most cities in the U.S., a proposal for development of a congregate care nursing facility on a designated wildland fire interface would be strictly prohibited by code** - due to added public safety risk and the burden to protect by local governments. Elderly care nursing facilities require very special considerations for fire protection and evacuation, due to ambulatory and memory impairments of their residents. It would be unreasonable and irresponsible of Boulder Planning staff to inflict such a large added public safety and evacuation risk on our Boulder City and County emergency services resources and tax payers. The development proposal use review should be rejected on criteria of incompatible use.

Lessons learned from the tragic loss of elderly residents during the recent 2017 Santa Rosa wildfires should be applied to our local Boulder development policies.

Sincerely,
Roger Koenig, 909 Mapleton Avenue
Citizens for Sanitas, A Colorado Non-Profit
C.C. James Robertson, Planning Director

Guest opinion

Does a congregate care facility belong near wildfire territory?

By Roger Koenig

In September of 2010, a large wildfire threatened the city of Boulder from our western open space and mountain forest periphery — The Fourmile Canyon Fire. From lessons learned, Boulder Wildland Division created a detailed plan for the defense of our city in a 156-page “Structure Protection Plan 2012.” This firefighting plan designates the western periphery of Boulder as an “urban wildland interface” — requiring unique fire protection planning, response and evacuations as a line of defense.

The Boulder Structure Protection Plan served our west Boulder community well on March 19, 2017 — as a plan to successfully manage the Sunshine Canyon Fire. City, state, county and regional firefighting organizations contained the fire under moderately windy conditions. There was neither loss of life nor homes. Firefighting costs are estimated to exceed \$725,000. It could have been much worse. Fire trucks from Denver were in Boulder to defend our homes, along with Colorado National Guard and U.S. Army aircraft. Thank you all!

Our designated urban wildland interface serves as a line of fire defense between the densely-populated city residential and commercial buildings and our mountain open space — which is subject to frequent wildfires on steep terrain. Over a dozen mountain wildfires have occurred in our foothills immediately west of Boul-



Roger Koenig / Special to the Daily Camera
Area closure notice at 311 Mapleton Avenue on March 19, 2017, during Sunshine Canyon Fire

der in the past 30 years.

Wildland fires are a constant hazard to our city. However, our Boulder building codes make no mention of our urban wildland interface designation. City of Boulder building code requirements are out of date, and inconsistent with our fire Structure Protection Plan 2012. Update is needed. The urban wildland interface experiences frequent fire hazards, and should be treated as such in our codes.

Our joint city and county Boulder Valley Comprehensive Plan policies (3.16) require that development in such areas be carefully controlled or prohibited to protect buildings in “hazardous areas” from forest fire. Compliance with Boulder Comprehensive Plan policy has been adopted by the city of Boulder and is required in the development site review process. City officials should uniformly enforce this policy.

Our wildland urban interface in the north central zone now has a new developer proposal for a large commercial “congregate

care” retirement community (over 300 residents, patients, employees) — proposed to be developed at 311 Mapleton Avenue. This development proposal is currently in planning review and is to be resubmitted soon. It is on the urban wildland interface and is subject to mandatory fire evacuation. As stated in our Structure Protection Plan, fire defense and evacuation are restricted by the steep terrain, fuel sources and lack of site access to the mountainous west side of the property. Is this the best location for a large new retirement and elderly nursing care development?

The currently developed portion of the 311 Mapleton property was under mandatory evacuation during the Sunshine Canyon Fire (per the Structure Protection Plan). It was also evacuated twice in 2010, during the Fourmile Canyon and Dome fires. Yet there are no Boulder codes requiring a fire evacuation plan for the 300+ elderly residents/patients and care providers proposed to

occupy the 311 Mapleton development. Under current Boulder code, an evacuation plan would be required only after the facility is built, and would be approved (or not) by the fire marshal at that time.

Over four acres of the 15.7-acre 311 Mapleton property have been designated as “open space—other” in the Boulder Valley Comprehensive Plan, since 1977. The developer proposes to build new residential and commercial facilities on this open space.

This portion of the 311 Mapleton property should retain its open space—other designation to protect our city and Mount Sanitas trails, rather than add to our wildland fire hazard. A decision to continue, or remove, this 40-year-old open space designation is before the Boulder Open Space Board of Trustees. A designation change would require modification of the Boulder Valley Comprehensive Plan in a public process.

Do high-density “congregate care” facilities for elderly patients belong on an urban wildland fire interface? Do they belong on our protected open space?

Please write your opinion to the Boulder Planning Board and City Council and attend future public reviews of “The Academy on Mapleton Hill” development proposal. The decision to be made is an irrevocable legacy for our city and public safety.

Roger Koenig lives in Boulder and is a member of the local group Citizens for Sanitas.

