

Tom Jankovsky, Chair

District 1

Perry Will, Chair Pro Tem

District 2

Mike Samson

District 3



February 24, 2026

Jennifer Schuller, Acting District Ranger
USDA Forest Service
c/o District Ranger
P.O. Box 309
Carbondale, CO 81623

Re: Twin Peaks Environmental Assessment – Garfield County Requested Transportation and Road-Protection Measures

Dear Acting District Ranger Schuller:

On behalf of Garfield County, we appreciate the opportunity to provide comments on the Twin Peaks Project Environmental Assessment (EA). Garfield County's primary interest is protecting county-maintained road infrastructure that may be used for project access and commercial hauling associated with forest thinning operations.

The EA indicates the proposed action would utilize National Forest System Roads, county roads, and temporary roads to access treatment areas, and it describes road reconstruction/reconditioning work that may be needed to facilitate commercial hauling. (Twin Peaks Draft EA at pp. 9-11.) The EA also summarizes anticipated project-related traffic and acknowledges potential delays and user conflicts during active operations. (Twin Peaks Draft EA at pp. 49-50.) In addition, the EA includes transportation-related design features addressing road maintenance agreements, wet-weather hauling shutdowns, prompt repair of road damage, and coordination with state, county, and local governments regarding closures, schedules, and safety information. (Twin Peaks Draft EA, Appendix A at pp. A-5 to A-7.)

For ease of reference, key transportation elements summarized in the EA include:

- Proposed access routes include NFSR 300.3 (Fourmile), NFSR 321.1 (Twin Peaks), and NFSR 800.1 (West Divide), totaling approximately 22.75 miles of National Forest System road use for access/hauling. (Twin Peaks Draft EA at p. 9, Table 2.)
- The EA identifies approximately 4.29 miles of proposed road reconstruction/reconditioning on NFSR 300.3 (Fourmile) to facilitate commercial hauling. (Twin Peaks Draft EA at pp. 9-10, Table 3.)
- The EA anticipates approximately 10.13 miles of temporary road use, including reuse of existing decommissioned road templates and new temporary road construction, with post-use closure and rehabilitation measures. (Twin Peaks Draft EA at pp. 10-11.)

- Forest Service traffic counts cited in the EA indicate average weekday traffic on NFSR 300.3 of 61 vehicles per day, with an estimated 2025 weekday ADT of 63 vehicles per day. (Twin Peaks Draft EA at p. 49.)
- **Over an assumed 5-year contract period (1,030 hauling days), the EA estimates approximately 1,197 loaded log-truck trips and 1,197 empty log-truck trips, plus approximately 3,590 support vehicle trips and 225 Forest Service administration trips.** (Twin Peaks Draft EA at Table 20, pp. 49-50.) The EA provides trip counts, but it does not specify truck weights/axle loads or peak-day hauling intensity; Garfield County requests that this information be provided to support meaningful road-impact planning and coordination.

Because the EA anticipates increased heavy-vehicle use and recognizes the potential for delays and conflicts during active operations, Garfield County requests that road-protection measures affecting county-maintained roads be clearly defined and enforceable. (Twin Peaks Draft EA at p. 50; Appendix A at pp. A-5 to A-7.)

To ensure impacts are managed responsibly and commitments are clear and enforceable, Garfield County respectfully requests that the Forest Service include the following conditions and mitigation measures in the decision record and implement them through enforceable contract provisions, as applicable:

1. **Identify and map the full haul route, including county road segments.** Provide a map and narrative identifying (a) the National Forest System Roads proposed for access/hauling and (b) the specific Garfield County road segments expected to be used to reach those routes, including alternates, turnarounds, and seasonal constraints. (Twin Peaks Draft EA at p. 9.)
2. **Mandatory pre-operations consultation with Garfield County Road & Bridge.** Require a coordination meeting with Garfield County Road & Bridge Department before haul operations begin (and prior to any major change in hauling schedules) to confirm haul timing and daily windows, traffic control and safety measures, emergency access considerations, and county permitting/bonding requirements that may apply. (Twin Peaks Draft EA, Appendix A at p. A-7.)
3. **Require County road use agreement.** For any county road segments used for commercial hauling, and especially County Road 117, require a county road use agreement (or equivalent written instrument acceptable to Garfield County) addressing maintenance responsibilities, repair standards and timelines, acceptance criteria, and an escalation/stop-work process for unresolved road-damage issues. (Twin Peaks Draft EA, Appendix A at p. A-5.) The County and White River National Forest have an existing Cooperative Forest Road Agreement (Schedule A FS Agreement 23-RO-11021500-011) that may be useful as a model for any necessary additional road County maintenance agreement to address road damage and repair issues resulting from the activities of the Twin Peaks Project.
4. **Pre- and post-haul road condition surveys for county roads (documentation and signoff).** As an additional implementation measure to document and verify compliance with the EA's commitment

to promptly repair any road damage caused by project activities, we request a requirement for baseline and post-haul road condition surveys (photos and written inventory) for county road segments used for hauling, jointly with Road & Bridge to identify and plan needed road repairs to equal or better condition with written County acceptance. (Twin Peaks Draft EA, Appendix A at p. A-6.)

5. **Provide truck configuration and loading assumptions (weights/axle loads) and peak-day expectations.** Disclose expected truck configurations and typical loaded weights/axle load ranges (or applicable legal limits), any oversize/overweight needs requiring county permits, and expected peak-day hauling volumes (not only averaged estimates). (Twin Peaks Draft EA at pp. 49-50.)
6. **Traffic control, public notice, and safety measures (MUTCD-consistent).** Require a project-specific traffic control and public safety plan for haul routes, including MUTCD-consistent signage and temporary traffic control devices where needed, and coordination with Garfield County regarding closures, road work schedules, hauling schedules, and other safety information. (Twin Peaks Draft EA at p. 50; Appendix A at p. A-7.)
7. **Clarify responsibilities and sequencing where road reconstruction/reconditioning is anticipated for county-owned and county-maintained roads.** Confirm the scope, sequencing, and standards for any road reconstruction/reconditioning activities anticipated to facilitate commercial hauling, and ensure road work is appropriately phased to minimize damage and safety conflicts during hauling. (Twin Peaks Draft EA at pp. 9-10.)
8. **Single accountable point of contact and rapid-response process for road issues.** Designate a USFS and contractor point of contact responsible for receiving road condition reports, coordinating immediate corrective actions, and working directly with Road & Bridge. (Twin Peaks Draft EA at p. 50.)

County Road 117 – Request for Cost-Share / Funding Assistance for Post-Project Road Repairs

Garfield County respectfully requests that the Forest Service consider **funding assistance or cost-share support** to help repair **County Road 117** following increased heavy-vehicle use associated with the Twin Peaks Project timber operations.

County Road 117 is an important access route supporting **forest management, timber operations, emergency services, recreation**, and local residents. Garfield County recognizes and supports the value of active forest management and responsible timber harvest activities; however, the County has experienced **measurable deterioration** to road surfaces and drainage features following prior timber-haul activity, and is concerned similar impacts could occur during Twin Peaks Project implementation.

Observed impacts from prior heavy-haul activity have included, but are not limited to:

- Surface rutting and base material displacement
- Degradation of drainage features, including ditches and culverts
- Increased erosion risk and sediment transport
- Reduced safety and accessibility for public and emergency use

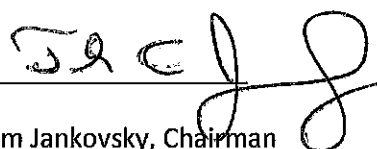
These concerns reflect the disproportionate effect that heavy trucks can have on pavement and road structures. For example, a federal GAO analysis notes that a typical five-axle tractor-trailer loaded to the 80,000-pound federal limit can have an impact on roadway pavements equivalent to thousands of passenger vehicles, and that pavement damage increases rapidly with axle weight. (U.S. General Accounting Office (GAO), *Truck Weight and Its Effect on Highways* (GAO-109954), July 23, 1979 accessed at <https://www.gao.gov/products/109954>)

Given the role County Road 117 plays in supporting Forest Service management activities and public access to federal lands, Garfield County requests that the Forest Service and the project operator meet with Garfield County Road & Bridge to (1) jointly assess road conditions and anticipated haul-route impacts, and (2) discuss potential funding mechanisms, cost-share participation, or cooperative agreement options that could help offset the cost of restoring County Road 117 to safe and sustainable operating conditions following project hauling.

Garfield County appreciates the Forest Service's consideration of these requested conditions and mitigation measures. Early and direct coordination with Garfield County Road & Bridge will help protect public infrastructure, reduce safety risks, and minimize disruption to the traveling public during Twin Peaks Project implementation.

Respectfully submitted,

**On behalf of the BOARD OF COUNTY COMMISSIONERS
Garfield County, Colorado**


Tom Jankovsky, Chairman
Board of County Commissioners

Cc Mike Samson, Board of County Commissioners
Perry Will, Board of County Commissioners
Fred A. Jarman, County Manager
Heather Beatty, County Attorney
Scott Marsh, County Road and Bridge Director