

To: Jennifer Schuller, Acting District Ranger
From: Ellen Sassano, Pitkin County Long Range Planning Manager
Date: February 26, 2026
RE Twin Peaks Environmental Assessment

Jennifer,

The following comments have been prepared by Pitkin County Staff including Liza Mitchell, *Natural Resource Manager, Open Space and Trails*, Kurt Dahl, *Environmental Health Manager* and Brian Pettet, *Public Works Director*, in response to the Twin Peaks Environmental Assessment, on behalf of the Pitkin Board of County Commissioners.

Thank you for the opportunity to comment. In general, Pitkin County supports the project as it achieves region-wide objectives regarding forest health as a long-term benefit to wildlife populations and biodiversity and supports strategic fire management planning.

We request consideration of the following specific Twin Peaks Project design features and operations as they relate to impacts to wildlife, habitat & waterways; water and air quality and County roads.

Regarding Wildlife

- Require Raptor nesting surveys prior to project implementation.
- Do not remove trees (live or dead) with cavity nests.
- Refine PODs prescription to prioritize biodiversity protection and resilience alongside fuels reduction, (over commercial harvest goals) for treatment area 5 in particular, and any other areas near streams, meadows or aspen stands.
- Regarding PODs prescriptions around aspen tree removal: Leave some dead, declining aspen for bird habitat - perch and nesting habitat. Avoid complete removal of Aspen trees, even in declining stands.
- Year-round activities are allowed in the Implementation Methods section - We recommend adhering to other restrictions listed in the EA and avoiding activity during May-August 15 to reduce impact to Elk summer concentration activity.
- Extend wildlife protection hours - change from 10pm-4am to dusk to dawn, or at least 8pm - 5 am.
- Clarify that contract work can't start until 8/15 - Include in key materials/public communication.

Regarding Stream Quality

- Protections for a tributary to North Thompson Creek that parallels the road/POD unit for some time are unclear. At a minimum we recommend adding a defined buffer between the road and the Creek for leaving creekside vegetation intact.

- Add wet meadows and riparian areas to Hydrology design Features #5 in addition to wetlands OR create another design feature to address activity in wet meadows and riparian areas to ensure proper protection in these disproportionately important habitat types.
- Clarify how many total stream crossings are proposed and reduce the total number, if possible, to reduce stream/water quality impacts.
- Consider design features addressing erosion control measures on steeper or cleared slopes, especially in areas of heavy equipment operation - either with seeding or erosion control depending on slope and bare ground exposure.
- Include a design feature that maximizes the amount of vegetation left near all creeks, stream channels and wetlands as an important measure for soil stability, watershed health, mitigating project impacts, and moderating thermal change to waterways.
- Hydro #18 - Require reclamation of disturbed areas before snow fall in areas where activity has ceased for the winter (rather than waiting until all activity ends and granting another year).
- The Middle Fork of Thompson Creek has Colorado River Cutthroat Trout (and other aquatic life), and they are a sensitive species to environmental contamination. Strict adherence to water quality related Best Management Practices and limiting creek/wetland crossings is very important to reduce the risk of the logging activities causing damage. As the Middle Fork of the Thompson Creek sits between the two proposed hill sides for logging, adequate infrastructure must be in place to protect the creek/wetlands.

Regarding Burn Piles

- Include stipulations and a schedule for burning hand piles. None are listed
- Give adequate, prior notification to the local jurisdictions when burning the piles (i.e. Garfield and Pitkin Counties, Carbondale and Glenwood Springs, local fire agencies, etc.).
- Given the expected dry conditions this summer, consider alternatives to burning if any are available. If none, please ensure the environmental conditions are adequate to allow any smoke to be dispersed and not held down by an inversion layer.

Regarding Vegetation Treatment

- Maximize potential for tree regeneration by protecting seed trees. Clarify how enforcement/accountability exists in single tree selection method that asks for high vigor and seed trees to remain standing. Also leave a small pod around those high value trees so they aren't just isolated.
- Add landscape patchiness to vegetation treatment, increasing mosaic and edge habitat for combined forest health and fire management.

- Require any topsoil moved in creation of roads or staging areas be stored on site and used on site in rehabilitation efforts.
- Prescribe seeding to occur at times of year when least likely to fail (spring/fall)
- Require treatment of the entire area for noxious weeds pre- and post-project as the project includes such a high density of weed vectors/corridors (roads, temp roads, and creeks.) AND Require an inspection of incoming equipment.
- Require ALL temporary roads (current and new) to be rehabilitated, specifying the use of an approved native seed mix that includes grasses *and* forbs.

Regarding County Roads

- Grading and road maintenance, including dust control as needed, will be required during and after project completion
- Adequate signage should be provided by the USFS on all haul roads warning the public of the potential for large trucks on the road.
- We anticipate the Twin Peaks Project as a topic for discussion for the Pitkin County Public Works Staff and U.S.F.S. Staff during the annual road maintenance and Schedule A meeting this year.

Thanks again for the opportunity to weigh in on this project. Feel free to reach out if you have any follow-up questions!

Ellen