



COLORADO

Parks and Wildlife

Department of Natural Resources

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Aspen-Sopris Ranger District
District Ranger Jennifer Schuller
50 Weant Blvd Unit A
P.O. Box 309
Carbondale, CO 81623

February 18, 2026

RE: 20260128 Twin Peaks Project (68876) Draft Environmental Assessment

Dear Jennifer Schuller,

Thank you for the opportunity to comment on the Draft Environmental Assessment for the Twin Peaks Project, located within Pitkin, Garfield, and Mesa Counties, Colorado. Colorado Parks and Wildlife (CPW) has a statutory responsibility to manage all wildlife species in Colorado. This responsibility is embodied in our mission to perpetuate Colorado's wildlife resources and provide sustainable outdoor recreation opportunities that educate and inspire future generations and future generations to serve as active stewards of Colorado's natural resources.

The USDA Forest Service is proposing a project to implement approximately 2,617 acres of vegetation management activities within the White River National Forest Aspen-Sopris Ranger District beginning in July 2026, but the provided material does not define an end date. The goal of the project is to improve forest resistance and resilience to potential future disturbances by maintaining or increasing age



Laura Clellan, Acting Director, Colorado Parks and Wildlife

Parks and Wildlife Commission: Richard Reading, Chair • James 'Jay' Tutchton, Vice-Chair • Eden Vardy, Secretary • Jessica Beaulieu • Frances Silva Blayney • John Emerick • Tai Jacober • Dallas May • Jack Murphy • Gabriel Otero • Christopher Sichko

class and structural diversity across the landscape, supporting fire management goals, and providing sustainable forest products. Additionally, Black Hills Energy plans to replace the aging infrastructure and current natural gas pipeline within the current right-of-way over the next two years (2026-2027). This draft EA includes commercial timber sales, stewardship contracting, and service contracts to complete the work; it will be a hybrid approach.

CPW generally supports projects like this that advance active forest management and enhance the resistance and resilience of our National Forest System, which provides valuable wildlife habitat. Thoughtful management activities are essential to reducing wildfire risk, improving forest health, and sustaining ecological and economic benefits for surrounding communities. We recognize the value of stewardship contracting as a preferred tool over traditional, single-purpose commercial timber sale contracts. Stewardship contracting enables the Forest Service to design projects around desired future resource conditions rather than focusing solely on outputs, such as timber volume, specified in a forest management plan. Coordinating with CPW provides greater flexibility to integrate restoration objectives, habitat improvement, watershed protection, and community resilience into project design and implementation. With those considerations in mind, CPW makes the following recommendations to accommodate wildlife needs:

- CPW requests that the project follow incremental development plans and reclaim any active locations before expanding into new areas, to reduce impacts on wildlife and recreational users.
- A 25 mph speed limit should be implemented on all access roads to minimize wildlife collisions and overall disturbance.
- The Black Hills Energy Pipeline Replacement portion of the project should ensure that any trenches left open overnight are fenced or covered to avoid wildlife entrapment.
- Provide plan design features that retain large amounts of coarse woody debris and variable-sized snags, thereby enhancing wildlife habitat in accordance with the best available science.

- Provide plan design features that ensure vegetation is retained, representative of the natural silvicultural condition of the forest type.
- Within six months of completing the fuels management or habitat improvement operations, administrative routes created for vegetation treatment should be regraded and closed through on-ground actions to physically obstruct public access and prevent bypassing of the closure points utilizing tree boles, root wads, boulders, etc.
- Apply a robust weed management plan that aligns with the weed management plans of Pitkin, Garfield, and Mesa Counties, respectively, and incorporates monitoring and long-term treatment.
- Refer to the Colorado Seed Tool¹ for a CPW-approved seed mix for reclamation.
- Forest resilience treatments should include scheduled periodic adaptive management assessments, a post-treatment landscape recovery plan that includes monitoring, maintenance, temporarily limiting livestock grazing to expedite revegetation, Colorado Seed Tool-approved wildlife-friendly seed mixes, revegetation thresholds, and best management practices to ensure the timely return of wildlife forage.
- Consult with CPW to consider hand-harvesting in riparian areas adjacent to Cutthroat Trout Crucial Habitat and Sportfish Management Waters to take advantage of opportunities to remove species that have encroached and caused habitat loss and degradation in these complex riparian, wet meadow, and wetland systems, thereby providing functional enhancements.
- Any roads, fire breaks, or administrative routes should avoid or cross perpendicularly wet meadows and riparian areas and include sediment control to prevent runoff from entering any aquatic habitat.
- To prevent the spread of aquatic nuisance species and diseases, all equipment, recreational vessels, and personal gear previously used in wet areas must be cleaned, disinfected, and thoroughly dried before and after being brought to the area. CPW recommends the following measures:

¹ Colorado Parks & Wildlife Colorado Seed Tool App.
<https://cpw.widencollective.com/assets/share/asset/z6owwh8sfa>

- o Remove all mud and debris, and spray/soak equipment with a 1:32 Spartan Profect 256 Super HDQ institutional cleaner and water solution. Keep equipment moist for at least 10 minutes.
- Or -
- o Remove all mud and debris, and spray/soak it with water above 140 degrees F for at least 10 minutes.

Thank you for the opportunity to be involved early and often throughout this planning process. CPW acknowledges the benefits that forest resilience and strategic fire management can have on a landscape and looks forward to working with the Aspen-Sopris Ranger District to apply this tool effectively while minimizing impacts on wildlife and recreationists. Every effort will be made to address potential impacts through site-specific consultations with CPW staff, as needed, to ensure we provide the highest level of protection for Colorado's wildlife species and habitats. Please contact Colton Distel, District Wildlife Manager, at 970-456-7003 or colton.distel@state.co.us with any questions or for consultations.

Sincerely,



Matt Yamashita
Area Wildlife Manager

Cc:

John Groves, Assistant Area Wildlife Manager

Julie Mao, Terrestrial Biologist

Kendall Bakich, Aquatic Biologist

John Barkowski, Montane/Forest Habitat Coordinator