

January 23, 2024

TWIN LANDFILL CORPORATION  
PO BOX 774362  
STEAMBOAT SPRINGS, CO 80477-4362

**Re: Twin Milner SUP and CD Amendment 2023 at 20650 COUNTY ROAD 205, ROUTT, CO 80487**

Dear Applicant,

Following are the comments regarding the Routt County's plan review for the above referenced project. We have noted several concerns and/or issues regarding the application. These items must be addressed through revised drawings and/or addendum in order for us to complete the project review for the above referenced project.

**Planning & Environmental Health Review** (Reviewed By: Alan Goldich and Scott Cowman)

1. There are several reports that Routt County does not have a record of. These include the annual compost report, the semi-annual groundwater monitoring reports for 2023, report of measures taken to control weeds, the semi-annual leachate management report for the second half of 2023, and the annual liquid waste transfer unit report for 2024. The County understands that the deadline to submit the leachate report is January 30, 2024 and the liquid waste transfer unit report is due February 28, 2024. Please submit all of the outstanding reports and be sure to submit the upcoming reports on time.
2. The submitted Appendices A or X did not have any tracked changes. Is this accurate?
3. In the past there have been issues with the amount of room necessary to effectively manage the compost operation. This was evident when compost that had not met testing requirements had been moved off site and material on the compost pad had been pushed over the containment berm as noted in the Compliance Advisory dated September 28, 2023. The revised Appendix H states that there will be a 50% increase in the amount of in process material on the pad (from 10,000 cubic yards to 15,000 cubic yards). With the space issues that have occurred in the past, how does the landfill justify being able to increase the amount stored on the pad by 50%?
4. Appendix S contains a summary of the drainage calculations. The EDOP mentions changes to some of those calculations. Do these changes warrant a revision to the calculations contained in Appendix S?

5. In section 4.3 (Soil Requirements and Availability) there is a statement that "Mr. Liman has granted permission for soil on this parcel to be used for site operations." This is not an approved use. Either this statement needs to be removed from the EDOP, or a statement needs to be added that soil on this parcel is only available after all required permits have been applied for and obtained.
6. Section 4.7.9 (Visual Impact Control) is woefully inadequate and not accurate. A full revision to this section that explains the visual impacts that the current and proposed operations have must be completed.
7. Staff does not have concerns with the visual impact that the lateral and vertical expansion will create as long as it is operated in a specific manner. The County will require that once the elevation of Mod 8 reaches a point that it is visible from Highway 40 and/or Milner that deposition of trash start at the northern end and proceed south. A condition of approval has previously been placed on the landfill that addresses this specific issue (although it has been removed because it was no longer warranted. This condition reads, "Landfill dumping area/working face and associated equipment shall be substantially screened from Highway 40. Screening berms will be constructed by placing a narrow, 10- to 12-foot high refuse lift at the north end of a given waste lift and perpendicular to the line of sight being screened. Interim cover will be placed on the berm as the berm is constructed so that the exposed refuse is minimal. The refuse lift will then be constructed behind the berm with the working face typically facing south away from visual corridors. Screening berms, interim slopes, and final slopes visible from Highway 40 shall be revegetated as soon as possible. If revegetation does not adequately mitigate visual impacts after six months, the Planning Director may require additional seeding and/or the use of temporary irrigation." Staff would like to discuss the specific wording of this condition so that agreeable language can be sent to the decision makers.
8. Please provide a timeline for when the different borrow areas will be developed to satisfy the soil needs for liner construction and ongoing operations. Please provide an estimate on the amount of soil and/or gravel that will need to be imported and a timeline for when that will occur. Also, there are conflicting references to the northern borrow area. Some references state that it is active and others say it is closed. Please clarify the status and use of the northern borrow area.
9. It appears that the east borrow area will be developed soon. Please provide plans for how that area will be mined, including plans to mitigate views and how the stormwater will be managed.

Staff would like to provide an additional comment as it relates to the review process. Staff has discussed with CDPHE the timing of their review. Depending on how their review goes, it could be months before they are able to provide the County with a recommendation as to whether the EDOP is in compliance with their regulations. However, Twin needs some certainty as it relates to the vertical and horizontal expansion. If the decision makers have concerns with the proposed expansion, staff would like Twin to be aware of it before CDPHE completes their review. Staff will be pushing this review through the process so that feedback from the decision makers can be provided, however staff will suggest that a decision on the application be tabled until CDPHE can complete their review and provide the County with a recommendation on compliance with their regulations.

Once you have uploaded answers to the questions above into the portal, please let me know that you have done so. If I can provide any further information to you, please feel free to contact me at (970) 879-2704 or by email at [agoldich@co.routt.co.us](mailto:agoldich@co.routt.co.us).

Sincerely,



Alan Goldich, Senior Planner  
Routt County Planning Department