

May 6, 2024

Cynthia Sandeno

Acting Forest Supervisor

Okanogan-Wenatchee National Forest

c/o Meg Trebon

Methow Valley Ranger District

24 West Chewuch Road

Winthrop, WA 98862

RE: COMMENTS TO MIDNIGHT RESTORATION PROJECT DRAFT ENVIRONMENTAL ASSESMENT (EA)

Dear Cynthia & Meg,

Twisp area community residents appreciate the opportunity to comment on the proposed Midnight Project draft Environmental Assessment (EA). The comments in this response are specific to the impacts of increased logging truck and related support vehicle traffic along roadways in our residential communities. Thank you for taking the time to consider these impacts to the quality of life of the residents living along the roadways utilized by the activities of the proposed Midnight Project, as well as the related costs that will be borne by the Okanogan County Public Works Department.

The Midnight Project EA outlined several benefits. But these benefits must always be weighed against negative impacts of the proposed activities. It is the duty of the Forest Service to mitigate these impacts to the best of their abilities. This is a project grand in scope at a size not seen in the Twisp Community in many years, if ever. The Forest Service is proposing a 20-year plan that will certainly change the quality of life in the areas impacted by the proposed activities.

This response is intended to 1) make the Forest Service aware of the increased traffic impacts specific to this project area and 2) propose several remediation efforts that will be necessary to mitigate the impacts to the quality of life along residential roadways.

As a review the draft EA proposes a 20-year project with significant commercial logging activity planned across a large area of National Forest in the Twisp area. The draft EA did not estimate the increase in logging truck and related support vehicle traffic that will be using our residential roadways.

Our first comment is these impacts are certainly large enough in scope to require a full Environmental Impact Statement (EIS) be prepared. This EIS must outline the following:

- 1) *anticipated increase in logging truck and related support vehicle traffic along residential roadways,*
- 2) *per residential roadway utilized - the planned number of years of operation, days of the week and hours of operation, number of daily hauls, and*
- 3) *impacts to the **safety of the public** using the roadways, and*
- 4) ***estimated costs** of the increased degradation on roadways of the increased traffic and*
- 5) *estimation of the increase in related **noise impacts**, and*
- 6) *effects of increased dust on the **health of residents** along roadways not currently paved. The negative health impacts of road dust are already well researched and documented as evidenced in the following meta-academic study example:*

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5968206/>

Once these impacts have been estimated in a full EIS it will then be necessary for the Forest Service to propose remediation efforts for public comment. We suggest the Forest Service immediately consider the following remediation efforts:

- 1) *engaging the Okanogan County Public Works Department to jointly anticipate increased impacts to residential roadways*
- 2) *engaging the Okanogan County Public Works Department for coordination and budgeting of remediation efforts*
- 3) *initiating proposals (per specific residential road) for limiting the number of total years of operation, setting limits on daily number of hauls and hours of operation, and imposing strict reduced speed limits on all vehicles on residential roadways related to the project, along with budgeting for enforcement.*
- 4) *banning the use of daily “per-haul” compensation contracts with trucking companies which only provide incentives for high-speed dangerous hauling, and*
- 5) *allocating funds for the paving of any high-use project access residential roadways (such as W. Buttermilk Creek Road from the junction of E. Buttermilk Road to the Twisp River Sno Park) to remediate the health impacts of increased dust on residents.*

Select residents living along roadways in our communities would appreciate in-depth consideration and future mitigation efforts of the Forest Service related to the vehicular traffic impacts of the proposed Midnight Project.

Sincerely,

Brian Roberts