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Organization:

Title:

Comments: Meg Trebon

Methow Valley Ranger District

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Dear Meg,

We are a group of residents of the Upper Twisp River Valley who appreciate the opportunity to comment on the Midnight Project Environmental Assessment. Over the last 10 years, four major wildfires burned around us, making us keenly aware of the need to manage forests for climate change and forest resiliency. Our comments focus on impacts of the Project on recreational use and the quality of life in this area.

Recreational Impacts on Upper Twisp River Community

The population has increased in the Upper Twisp River Valley beginning with Covid. During that time, many part-timers became full-timers whether through retirement or the ability to work remotely, and new people have built houses and moved to the area. A high percentage of our current community take advantage of the recreation opportunities available here. At the same time, more people who live elsewhere have discovered these opportunities in part because trails in the North Cascades National Park became overly crowded during and after Covid, and in part because publicity about the area increased because of articles in the Seattle and Methow Valley newspapers.

Consequently, we disagree with the Forest Service's assessment that the Midnight Project "would have no substantial impact on recreation resources." Specifically, we believe snowplowing both roads on either side of the Twisp River significantly impacts recreational use in the Upper Twisp River Valley. The Recreational Specialist's Report focuses on the impact to snowmobilers but not on the many Nordic and backcountry skiers, fat-bike riders, and walkers who use those roads continually throughout the winter.

We are not opposed to snowplowing these roads but recommend that the USFS recognize how recreational uses other than snowmobiling will be impacted and plan accordingly-see table below.

from Table 4 Recreation Design Features for Midnight Restoration Project

Rec 8 During winter harvest, plowing will not occur on designated snowmobile routes on both sides of the Twisp River during the same winter season without consultation between the Recreation Specialist and the TSA. If plowing both sides is necessary, the TSA will give Recreation staff notice 60 days prior to timber sale offer dates and sale award, and at least 2-weeks notification prior to start of operations. The Recreation Specialist will notify winter recreationists and affected partners within 28 days so that alternative routes may be groomed and used. How will the USFS "notify winter recreationalists?"

We recommend that the USFS develop a plan for communicating with winter recreational users who are not snowmobilers.

Log-Hauling Traffic Impact on Residents

In the Draft Economics Specialist Report (pg. 4), the USFS does not address the negative "impact of logging

traffic on public safety and quality of life" in regards to its "dust, noise and traffic."

We understand that logging traffic cannot be avoided; however, managing and mitigating its impacts is essential to the quality of life of our community. With winter logging, we are being asked to live with logging traffic for potentially 52 weeks out of the year for three to five years. Given that, the USFS must develop a plan for mitigating the following impacts:

*Dust and other particles negatively affect human health, especially for those people with respiratory diseases

*Speeding log trucks threaten the lives of pets, pedestrians, bicyclists, and equestrians, and deer and other wildlife

*Noise from logging trucks disrupts sleep and daily activities. (Log hauling operations start at 2am.)

*Not knowing the logging project schedule and hours of operation is a safety issue. We do not know when it is safe to use roadways for recreation.

Recommendations:

*Enforcement: USFS should develop an enforcement plan for trucks that speed and engage in other unsafe driving. During previous logging activity, the USFS asked residents to report trucks driving unsafely, essentially making the public and not themselves responsible for our safety.

*Safety Plan: Develop a plan that ensures our safety during log hauling operations, including warning and truck speed-limit signage. (See table below for additional recommendations.)

*Communications Plan: Develop a plan that defines how the USFS will communicate with Upper Twisp River Valley residents about logging schedule, hours of operations, and other safety issues. (See example below re: communications)

*Noise and Dust: Develop a plan for mitigating their adverse impacts on human health and the quality of life.

*Additional recommendation:

from Table 4. Recreation Design Features for Midnight Restoration Project

Rec1Log haul is prohibited on weekends from Friday 5 p.m. until Monday 2 a.m. and on federal holidays unless approved by Recreation staff and the Timber Sale Administrator (TSA). When log haul occurs on the Thompson Ridge Road (FSR 4410), warning signage will be placed at locations specified by the Recreation staff to provide additional notice for users. The TSA will notify all haul drivers of potential for mixed use on this

Recommendation: Given the increased recreational use on Twisp River Road, we request that it receive the same treatment as Thompson Ridge Road in regard to warning signs and communication with users. Residents who live in the Upper Twisp River Valley can designate a specific communications liaison with the USFS.

Thanks, again, for the opportunity to comment on the Midnight Project!

Best,

Emily Warn

Elliott Waldron

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