

I am a landowner in Ski Tur Valley in Gold Creek Valley. I am also the president of the homeowners' association, the Ski Tur Valley Maintenance Association (STVMA), but I am submitting my comments as an individual, one who first purchased property in the valley in 1982.

I have comments on two aspects of the Gold Creek restoration proposals:

1. Modifying the Heli's Pond site
2. Addressing the problem of the disconnect of Gold Creek from the Keecheles Reservoir

1. Heli's Pond

I am particularly concerned with the proposal to modify Heli's Pond, which lies to the north of Ski Tur Valley. Areas of Ski Tur Valley lie within a 100-year flood plain. The valley has been periodically inundated with floodwaters over the years. Following a significant flood in Ski Tur Valley in 1996, a berm was constructed to the south and west of Heli's Pond with an outlet channel from the Pond directing water back to Gold Creek. Since the creation of this flood prevention system in 1996, there has been no flooding in Ski Tur Valley.

When the Draft Environmental Impact Statement for the Kachess Pumping Station and the Keecheles to Kachess Conveyance (K to K) was released in 2015 it included four restoration projects for Gold Creek Valley as part of a Bull Trout Enhancement package. One of those projects was filling Heli's Pond and the outlet channel. The publication of the DEIS was the first time the STVMA community learned of any of the proposals and immediately took the following actions:

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| 3/9/15 | STVMA becomes aware of restoration proposals for Gold Creek Valley including filling of Heli's Pond and its outlet published in Draft Environmental Impact Statement for a BuRec irrigation project (K to K) | |
| 3/10/15 | STVMA letter to BuRec signed by 22 STVMA members | Objection to proposal to fill Heli's Pond in DEIS. |
| 3/15/15 | STVMA letter to Natural Systems Designs (NSD) | Request a review of data and recommendations in concept memo. |
| 3/31/15 | Technical Working Group meeting in Cle Elum | Kittitas Conservation Trust (KCT) acknowledges insufficient data to fill Heli's Pond. |
| 4/8/15 | STVMA letter to KCT | Request revision regarding filling Heli's Pond. |
| 4/28 /15 | NSD revises concept memo (a) | NSD/KCT moves Heli's Pond to lowest priority. |
| 6/15 /15 | STVMA sends letter to Bureau of Reclamation during comment period. (b) | Request that modification of Heli's Pond be removed from the FEIS. |

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| 6/19/15 | STVMA letter to KCT requesting removal of Heli's Pond from FEIS (c) | |
| 6/22/15 | Response from Mitch Long of KCT that project has been removed from conceptual designs and should be removed from FEIS (c) | "This was removed from our conceptual designs included in our draft recommended actions for Gold Creek. It should be removed in the FEIS." Mitch Long |
| 3/6/2019 | Reconfiguration of Heli's Pond and levee included in FEIS | |
| 3/13/20 | Modifying the Heli's Pond site included in USFS scoping | |

Heli's Pond has provided clear benefits to the Ski Tur Valley community, whose members have repeatedly expressed their concerns that there is insufficient data to support modification to the Pond to benefit bull trout. NSD has acknowledged this lack of data. KCT has assured STVMA that it has been removed from consideration. Nevertheless, it appeared in the appendix to the K to K FEIS and now in this scoping document.

Please provide the data to support this proposal. It would be most unfortunate to lose the flood protection Heli's Pond and the berm have provided for Ski Tur Valley since 1996, particularly if there are no benefits for Gold Creek or bull trout.

Sources:

(a) 4/28/15 FINAL Gold Creek Concept Memo prepared for KCT by NSD

"This location in Gold Creek is where the maximum extent of dewatering was observed during monitoring in 2013 and 2014 (NSD 2013b, 2014a). A more detailed local monitoring study should be conducted in Gold Creek and Heli's Pond to better understand the exchange of groundwater and surface water between these features. This more detailed monitoring would serve to focus restoration needs and strategies at Heli's Pond. Due to these uncertainties, restoration of Heli's Pond is considered lowest priority of all the restoration actions proposed, and any proposed actions will need the full support of Forterra and the SkiTur community prior to implementation. Any proposed actions will require maintaining the flood benefits from the flood diversion structure (berm) constructed in 1996 to the SkiTur community downstream."

(b) 6/15/15 STVMA letter to Bureau of Reclamation during public comment period

During the reopened comment period for the K to K DEIS, STVMA sent a letter on June 15, 2015 expressing the community's concerns with each of the proposed projects to Candace McKinley, Environmental Program Manager for the Columbia-Cascades Area Office of the Bureau of Reclamation. The following is the section on Heli's Pond:

"Heli's Pond. The DEIS contains a recommendation to fill Heli's Pond and outlet. We have discussed this issue directly with Natural Systems Design, specifically the lack of data to support this conclusion. NSD has issued a new concept memo stating that Heli's Pond is the lowest priority of all the restoration actions proposed and that additional study and full landowner

support would be necessary before any such recommendation to fill the Pond could be made. Given the flood protection provided to our community by Heli's Pond and the surrounding berms and Natural Systems Design's revision of its own recommendations based on lack of data, we request that the recommendation to fill Heli's Pond and outlet be removed from the K-to-K final EIS."

(c) 6/22/15 STVMA letter to KCT requesting removal of the recommendation to fill Heli's Pond from the FEIS with KCT's response that it has been removed from their recommendations (KCT's response is in blue)

June 22, 2015

Dear Heli's Pond Working Group and STVMA,

Below is your letter dated June 19th to KCT with our responses to your questions and concerns in blue. It is my hope that this will be a continuation of our discussions to outline the next phase of restoration of the Gold Creek Valley and solidify our commitment to working with the STVMA in the proposed design phase of instream habitat restoration. It is our hope that we are moving closer to getting a signature for the "Landowner Acknowledgement Form". Many of the other specific details can be outline in a Landowner Agreement that will determine roles and responsibilities, communication plan, collaboration, and other important items you have detailed in your letter. This agreement would be the next step in our process after we have received a signed acknowledgement form. We are required to have the acknowledgement form signed prior to August 14th (sooner if possible) to be eligible for SRFB funding for this grant round. Without it there will not be a project sponsored by KCT for the preliminary design phase of this project for the 2015 grant round.

Thank you for the opportunity to address the STVMA concerns and questions. The STVMA is an essential partner in our efforts to restore habitat for Bull Trout in the Gold Creek Valley.

Sincerely,

Mitch Long

Project Manager

Kittitas Conservation Trust

June 19, 2015

Dear Mitch,

Members of STVMA met on June 13, 2015 to discuss the content of a public comment to the four bull trout enhancement proposals for Gold Creek Valley set forth in the DEIS for the K-to-K project. The members had a diversity of viewpoints and interests, but agreed on the following:

We requested:

that the previous recommendation to fill Heli's Pond and outlet be removed from the final EIS

This was removed from our conceptual designs included in our draft recommended actions for Gold Creek. It should be removed in the FEIS.

2. Disconnect from Keechelus Reservoir

According to the Table 4-44 of the 2019 FEIS, when Keechelus Reservoir level is drawn down below elevation 2,466, tributary access for bull trout is adversely impacted for between 129-133 days in 69-81 of 90 years modeled. It would seem that this disconnect is such a serious impediment to bull trout spawning that it would negate any efforts to re-water upstream reaches. Why was this not included in the restoration plans and what actions will be taken to reduce/eliminate this impediment to provide bull trout access to Gold Creek?

Table 4-44. Frequency and Duration of Keechelus Pool Level below Elevation 2,466, All Alternatives

| Unit | <i>Alternative 1 – No Action</i> | <i>Alternatives 2, 3, and 4</i> | Change ^a | <i>Alternatives 5A, 5B, and 5C</i> | Change ^a |
|---------------------|----------------------------------|---------------------------------|---------------------|------------------------------------|---------------------|
| Years | 80 | 81 | 1 | 69 | –11 |
| Mean duration, days | 129 | 131 | 2 | 134 | 5 |

Note: At elevation 2,466, bull trout access to tributary streams is impeded.

^a Change from *Alternative 1 – No Action*