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April 21, 2024

Okanogan-Wenatchee National Forest

Responsible Official Scott Robinson, District Ranger c/o Patty Garvey-Darda, Project Lead

Cle Elum Ranger District 803 West 2nd Street

Cle Elum, WA 98922

Submitted to: <https://cara.fs2c.usda.gov/Public/CommentInput?Project=57415>

Subject: Gold Creek Valley Restoration Project, Draft EA Comments

District Ranger Robinson:

The Sierra Club has reviewed the Draft Gold Creek Valley Restoration Project Environmental Assessment and Finding of No Significant Impact (Draft EA). The Sierra Club has a long history of involvement in the lands in and around Snoqualmie Pass, working to protect and restore the land and waters of this remarkable ecosystem. We are interested and supportive of the efforts to improve the habitat for Bull Trout in the Gold Creek/Keechelus Lake ecosystem, and would like to share our thoughts and concerns regarding the proposed restoration work that is currently being designed.

In general, we support the intent of the restoration design presented in the Draft EA documents. Recovery of bull trout populations is of utmost importance in the Yakima River watershed, and improvement of the ecological conditions in the Gold Creek Valley would benefit this recovery effort for bull trout, and presumably also other fish species in Gold Creek. We appreciate the extensive review by and inclusion of consultation with multiple entities as listed. The Draft EA presents a multipronged approach to this recovery effort, much of which is practical and timely. However, there are also questions and concerns regarding aspects of the Draft EA analysis, design, and planned implementation which need to be clarified and resolved prior to project approval.

Duration of Closure:

Timeline: The Draft EA currently predicts that the construction impacts at Gold Creek Pond is expected to be year-round for 5-7 years, but could extend up to 10 years. The reasons for such an extended closure are unclear. Is there one element in particular that is driving this

extended time frame? It is clear that the construction season at this elevation is constrained by weather, particularly the need to work within the streambed when the creek is dry.

Additionally, the discussions of accessing appropriate fill material for Gold Creek Pond and Heli[rsquo]s Pond suggests that the timeline may be impacted by [ldquo]availability and proximity of fill material, and contractor productivity.[rdquo] (Gold Creek Valley Restoration Preliminary Design Report, p 16). It would seem reasonable, in order to decrease the impact of such a closure to the recreating public, that fill materials be identified and stockpiled prior to the closure of the Gold Creek area. The Access & Staging plans for Gold Creek Instream Restoration anticipate that the instream restoration and Gold Creek Pond fill work will occur simultaneously. Having additional fill materials on-hand and closely coordinating the work to occur in parallel rather than in series could have a beneficial impact on this extensive closure timeline.

Gold Creek Pond Restoration

Fill Material: We continue to be concerned about the source of fill material to be used in Gold Creek Pond and Heli[rsquo]s Pond. It is imperative that the extraction of this fill material not cause adverse environmental impacts at the source point. Also, the particular gradation required to adequately mimic the natural conditions of the site would likely not be met by random fill material from other construction excavations or quarry material. In order to reduce the timeline for the project, it is highly recommended that potential fill material be identified, acquired, blended and and stockpiled prior to the onset of the project.

Fill and Compaction: It is unclear how the fill will be placed and compacted without dewatering of the ponds. The Gold Creek Valley Restoration Preliminary Design Report (Design Report) states that [ldquo]Material used to fill the pond would ideally be of similar gradation and size to that which was removed when the pond was mined and compacted to achieve a similar hydraulic conductivity as the surrounding floodplain aquifer.[rdquo] (p16) Also, [ldquo]All fill will be placed in the pond without dewatering[rdquo] (p16). If the target gradation for the fill will be 25-35% fines, 25-35% sand, and 25-35% gravel/cobble, simply dumping this material into standing water will not result in a density similar to the surrounding floodplain. This material will remain loose and unconsolidated, and the settlement of the material will stratify as it drops through the water column with the heavy gravel in the bottom, and the fines and sands floating down on top. This lack of cohesion between the different particle sizes could allow for migration of the fines out of the fill area, leaving only larger diameter materials behind, with large interstitial spacing that would not have any ability to maintain groundwater storage. Additionally, it is not clear how the contractor would be able to compact the fill material that has been dumped into the ponds if they are not dewatered.

Pond Hydrology: The Draft EA states that Gold Creek Pond would be partially filled and that [ldquo]the pond would no longer be hydrologically connected to Gold Creek[rdquo] (p6). Given the porous nature of this area, what is the basis for the determination that Gold Creek Pond can be hydrologically isolated from Gold Creek without some type of lining?

Tree Harvest: The Draft EA states that trees may be harvested from upland private property west of the creek to support proposed habitat improvements in the adjacent stream channel, and that trees would be removed between Gold Creek and Gold Creek Pond (p32). What are the ages and total number of trees that would be logged on USFS or private property due the proposed project, including trees deemed hazardous? Are there alternative sources of trees to provide habitat improvements?

Topsoil Amendments: It is recommended that organic materials be added to the Gold Creek Pond Restoration area after the ponds are filled. The Design Report suggests that a vegetation monitoring plan will be developed to inform adaptive management, including amending topsoils. This would imply that topsoil amendments are not part of the baseline design, but would only be included in the future if the gravel fill material does not adequately support revegetation efforts. The current condition of the Gold Creek Pond area makes it clear that just leaving exposed gravel fill material in the hopes that vegetation will take root and thrive is not likely to succeed. The landscape surrounding Gold Creek Pond has not been able to successfully support vegetation in the many decades since the ponds were created.

Proactively adding topsoil to areas within the Gold Creek Restoration area that are designed to be drier and not annually flooded would increase the likelihood of successful revegetation efforts.

Access Routes: The Design Drawings show the proposed access routes for both the instream channel restoration and the pond restoration. We request that the design drawings clearly indicate which of these routes are temporary and which are utilizations of existing roadways to differentiate their final condition. The design drawings stipulate that temporary routes will be revegetated while existing roadways will be regraded. Temporary routes should not only be revegetated, but also regraded to a more natural condition, ripped if compacted, and completely blocked at entrance points to prevent unauthorized access after construction is completed. Existing roadways that are used as construction access should not be widened beyond their current dimensions.

It is imperative that these new temporary roadways do not become public access points either during construction or after project completion. At any time that active construction is not underway, all temporary access points should be completely blocked and the closure monitored to ensure the public complies with the closure. And it is imperative that these temporary roadways are obliterated and screened/hidden after construction is completed to prevent their use by unauthorized means.

Wildlife Connectivity: The Draft EA states that one of the objectives of the project will be to provide [ldquo]contiguous habitat in a major wildlife migration corridor[rdquo] (p4). Doesn[rsquo]t Gold Creek already provide a mitigation corridor? How will the proposed project improve or hinder this connectivity?

Bull Trout Recovery: The Draft EA provides no bull trout population numbers. Page 15 states that population numbers for Gold Creek bull trout are extremely low and at risk of extirpation, but also states that the cumulative impact of disturbances over time have deteriorated the natural landscape to a point that it can no longer sustain viable populations of bull trout. What are the actual reported (or estimated) numbers currently using the Gold Creek Valley? What are the numbers of bull trout that would be expected if the project were completed as proposed?

Recreational Impacts

The Draft EA stipulates that the entire site will be closed to the public year-round for the duration of the project, ie 5-7 years, potentially up to 10 years.

Trail #1314 Access: The Draft EA does not address the closure of access to Trail #1314, which accesses the upper Gold Creek Valley. Current parking for this trail is at the Gold Creek Pond parking lot. Will there be any temporary parking available for hikers to allow for access to this trail, or will this trail be closed for the entire duration of the project?

Trail #1250 Should be Paved for ADA Accessibility: The Draft EA plan includes replacement of the existing ADA accessible trail after site restoration is completed. The plan indicates that the facilities will be replaced in-kind. The current trail, Trail #1250, is an asphalt paved trail that circumnavigates Gold Creek, and also accesses the picnic area on the shores of Gold Creek. The replacement trail has been designed to be the same length, and must also be designed as a PAVED trail. The Gold Creek Valley Recreation and Scenic Resources Report only states that [ldquo]The new, 1.0-mile replacement trail would continue to be ADA-compliant[rdquo] (p42), but that description does not imply a paved trail[mdash]only a trail with compliant grading. Gold Creek Pond is the only paved ADA trail in the I-90 Corridor that provides picnic facilities with views of the higher elevations of the Cascade Mountains and the Alpine Lakes Wilderness Area. Public users with limited mobility, in particular users in wheelchairs (both manual chairs and motorized chairs), cannot navigate a dirt trail that has roots, rocks, loose debris, or uneven terrain. Given the limited funding available for trail maintenance, it is not likely that a dirt trail will be maintained to a standard that would provide adequate access to these types of users. Only a paved trail would provide long-term, safe, usable access for all members of the public.

On a personal note, I visit Gold Creek Pond numerous times per summer with my brother, who is confined to a wheelchair after a lifetime of exploring the Alpine Lakes Wilderness Area from the I-90 corridor. There is no other place within the range of this project that allows him to wheel out under his own power and enjoy the scents, views, and silence that he remembers and cherishes from his life as an avid outdoorsman. I am sure he is not the only member of the public that relies on Gold Creek for such pleasures, accessible only because of a paved access trail.

Day Use Only Management: The draft EA documents indicate that the Gold Creek Pond area [ldquo]would continue to be managed as day use only.[rdquo] (Recreation and Scenic Resources Report, p6). We agree with this management plan, consistent with Forest Plan direction. However, the Forest Service must increase enforcement of this management designation, particularly in the winter. It is clear that unauthorized overnight usage occurs in the winter, as evidenced by the cutting and burning of small trees at the picnic area, as well as the volume of garbage that is left near the closed restrooms. It will be particularly important to enforce the closure of this area during the timeframe of the construction period, particularly in the winter months when the contractors will not be on site. Closed gates and signage will not be adequate to keep winter non-motorized users out of the area, either during construction or after the project is completed.

Entry Gate: The draft EA states that an entry gate would be placed on Forest Service Road 4832-142 near the intersection with FSR 4832 [ldquo]where visitors would scan a valid Northwest Forest Pass or pay day use

fees[rdquo] (p7). It is assumed that homeowners in the Valley would have privileged access. This same gate type would be installed as part of the Keechelus Lake Access Modifications (p8). We have not seen this type of access gate before, and wonder how it would work. Is it in use yet at other recreation sites on the National Forest? Will

there be power requirements for this gate? Internet connectivity? Is there adequate funding in the Forest Service budget to maintain, repair and/or replace the scanner/pay kiosk?

SnoPark Impacts: The widely known and popular Gold Creek Snowshoe Trail is a portion of the Washington State Sno-Park system, and is highly used in the winter for non-motorized day-use access. The Snowshoe Trail loops around Gold Creek Pond, a large reason why it's so popular. During the winter, FSR 4832 is often crowded with vehicles and people, as is FSR 4832-142 with people snowshoeing and walking. Groups and families with children are common recreationalists here, due to the closeness of Seattle and I-90. Many families don't even get as far as the parking lot or Pond, but just recreate on the road leading up to the Gold Creek Pond area.

With construction going on for multiple years, any closure of the Gold Creek Snowshoe Trail would be a huge loss for day-use winter recreationalists. Therefore, while safety and security of the site is of primary importance, day-use winter access should be considered and continued if at all possible. There may be some mitigation possible if construction remnants, debris, structures, rock or dirt piles and equipment are stored elsewhere than on the road and trail. This would necessitate that the area be 'put to bed' safely and securely each fall before the snow season, while also addressing the issues discussed under Day Use Only Management (see above).

Keechelus Access Modifications and Cross-Country Travel Closure

We are highly supportive of the Keechelus Access Modifications and the Cross-Country Travel Closure included in the Project. The entry gates, guardrails and closure orders will protect the Keechelus shoreline, lake bed, and the mouth of Gold Creek. These modifications and closures should be implemented at the earliest opportunity, with public education and enforcement implemented simultaneously.

Gold Creek Improvements: As part of the protections that these closures will provide to the mouth of Gold Creek, we would be interested in any opportunities to improve the streamside conditions along the thalweg of Gold Creek that is exposed as the Keechelus Reservoir is drawn down. Are there plantings of trees or shrubs that could be placed along the exposed river corridor that would be able to withstand the alternating inundation and dry conditions, and which over time would be able to provide shade, screening, and better habitat conditions? It would seem logical that such screening would protect the creek during the warm months, maintaining lower water temperatures.

We appreciate the opportunity to comment on this project. Please keep us on the mailing list and informed of future developments.

Sincerely,

Nete Olsen

National Forest Committee