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Comments: This letter was manually added to the Reading Room by the Forest Service.

Gold Creek Pond modified alternative B

I support the following proposal for the USFS plan to enhance bull trout habitat in Gold Creek valley, so that bull trout populations will increase and flourish in the upper Yakima basin. This proposal primarily focuses on the plan for the Gold Creek pond, with a few general comments relating to Gold Creek. Additional comments on Gold Creek will be forthcoming as more information becomes available from the USFS and its partners.

To date (July 2020) the USFS has proposed three alternatives for the restoration of Gold Creek pond; referred to as alternatives A, B and C. These alternatives can be found on the USFS's website. I support a modified alternative B as discussed here and as shown on the attached graphic.

I support the USFS plan to enhance the Gold Creek pond area. This area presents a unique recreational experience adjacent to the Alpine Lakes Wilderness. Because of Gold Creek pond's close proximity to I- 90 it is an area that many travelers and visitors can enjoy. The alpine setting is a true treasure, framed by Rampart Ridge on the east side of the valley, Chickamin Peak at the head of the valley and Kendall Peak and other mountains on the westside. On clear days these mountains (and the sky) are reflected on the surface of Gold Creek pond. Currently there is a combined asphalt and elevated wooden trail around the pond that is ADA accessible. Way stations around the pond provide information to those who are walking around the pond, providing information related to the history of the pond and the animals that inhabit the area. Picnic facilities are present at the south end of the pond.

As mentioned, I support a modified alternative B plan. Key features of the modified plan compared to alternative B include leaving the pond's footprint essentially as it exists today (note below, that if it is shown that the pond lowers the groundwater and water in the stream, I propose raising the pond elevation to eliminate this effect). This proposed plan would not involve any fill material being placed in the pond, either to reduce the footprint or reduce the depth of the pond.

I concur with the plan to relocate the pond outlet to the westside of the pond. This relocated outlet flow would be directed into Gold Creek such that the outlet flow channel length would be minimal. Consideration should be given to raising the pond surface elevation if it can be determined that the pond is lowering the groundwater table in the immediate vicinity of the pond. This could be accomplished by a flow control structure at the outlet.

I propose enhancing the existing low-class wetland on the northeast side of the pond and constructing wetlands on the east side of the pond where the current pond outflow channel is, creating a continuous wetland on the east side of the pond.

Topsoil and soil amendment would be brought in and placed around the area bordering the pond. Native plants would figure prominently in this area.

I would like to see more picnic tables and freestanding grills installed in the southern part of the pond area and at other areas around the pond.

More interpretative signing needs to be installed around the pond including signing discussing bull trout enhancements in Gold Creek, the plan to introduce salmon in Keechelus Reservoir, information on the Alpine Lakes Wilderness recreational area including a map of the valley highlighting the lakes and hiking trails, history in the valley including mining and logging, etc. The asphalt trail around the pond should be widened while meeting ADA accessibility requirements. The wooden section of the trail should also be replaced and widened to the match the width of the asphalt trail.

Other features related to the modified plan B include relocating the Starwater storm drainage system so that it discharges into Gold Creek, assuming that the function of the storm drainage system is not degraded as a result of relocation. The parking capacity would remain as it is today. Finally, Heli's pond should remain in its current state.

This plan meets the purpose and needs of the project. The modified plan that I am proposing has the following benefits compared to the existing alternatives; conserving natural resources (up to 750,000 cubic yards of fill material) by not filling in the pond with material similar to what was excavated by WSDOT, this material is commonly referred to as gravel borrow. Also, by not filling in the pond between 30,000 to 50,000 dump truck trips (depending on whether the gravel borrow is delivered in dump trucks or by dump and pups) would be eliminated, saving up to 190,000 to 320,000 gallons of diesel fuel and eliminating the associated air pollution. Note, this assumes a 40-mile round trip, about 6.5 miles per gallon and 750,000 cubic yards of fill.

Other environmental benefits of this plan include a reduction in construction noise generated by hauling in gravel borrow fill material and by the equipment placing the fill material in the pond. Very little construction dust is generated on the Forest Service road and at the pond since haul trips are not occurring. Finally, water quality is not being degraded in the pond and in the stream since there is no infilling of the pond in the modified B plan. However, this is not the case for alternatives A, B and C.

This plan addresses issues brought up by the USFS; wetlands are created and existing wetlands are enhanced providing habitat adjacent to the pond for amphibians and other animals.

Native vegetation is planted around the pond providing habitat and shading adjacent to the pond.

Relocating the outlet of the pond from the eastside of the pond to westside allows cooler water from the pond to mix with the stream by reducing the length of channel flow before pond water merges with Gold Creek waters. A flow control structure could be incorporated at the outflow that would provide intake from the deeper parts of the pond which would be cooler than surface water and the structure would control the amount of water leaving the pond, minimizing concern that the pond is drawing down the adjacent ground water table and water levels in the stream (note: I do not believe that this is occurring but by controlling the pond outflow this should lay to rest concerns that others may have).

This modified plan B is more cost effective compared to the current A, B and C alternatives so that project funds can be spent on bull trout habitat in Gold Creek and other streams in the watershed. This plan is estimated to cost under \$4 million, compared to previous estimates of \$14 million or more.

The outdoor experience for visitors to Gold Creek pond will be enhanced. For some users to the pond this may be the first exposure to the wilderness, leading to a more in-depth appreciation and future exposure to other wilderness activities.

Based on the majority of comments, people wanted to keep Gold Creek pond, which is the case with this proposal.

Gold Creek pond and Heli's pond can be used to supply fire suppression water in the event of a forest fire.

Just like the proposed alternatives; A, B, C, this plan allows cross corridor movement of wildlife.

I have the following general comments on plans to enhance bull trout habitat in Gold Creek; climate change needs to be addressed (not so much for the Gold Creek pond enhancements that we are proposing here in this document) but for the stream enhancements. There are several reasons for addressing climate change; first to ensure that taxpayer funding for the stream enhancements will provide a future benefit as a result of climate change, and secondly to minimize chances that this project will be challenged in the courts if climate change is not addressed in the environmental assessment. While the direction from the current administration in Washington D. C. may be to not include climate change in environmental documents, it should be evaluated "informally" by looking at several different stream flow scenarios in Gold Creek for the reasons listed above.

Changes to the stream in the vicinity of Ski Tur Valley and the Starwater community needs to ensure that the changes do not lead to flooding or property being eroded due to narrowing the stream channel. These impacts are most likely to occur during the high stream flows in the spring.

The bull trout habitat needs to focus on Gold Creek (as opposed to Gold Creek pond) . This is where the resources need to be directed. To accomplish enhancing the habitat in Gold Creek for bull trout and possibly for salmon if they are introduced into the Keechelus Reservoir, the project needs to identify the existing deficiencies in the stream (I believe that the modified alternative B has addressed any possible deficiencies associated with Gold Creek pond) by ranking the deficiencies and quantifying solutions to correct each of these deficiencies. The solutions need to be thoroughly vetted to give a high degree of confidence that constructed enhancements will function as envisioned. After a stream plan is developed, a multi-day value engineering session should be held to evaluate the stream plan. Subject matter experts would be on this team and they would be comprised of individuals who have not been directly involved in this project. Holding value engineering studies is common on projects that are complicated and have high costs associated with them which is the case on this project. There are several benefits to this approach; first, the public would feel more confident in the project, second, either cost savings or value-added benefits could be introduced into the project by having a fresh set of eyes evaluating the proposal. If the value engineering team recommends changes to the plan and the changes are incorporated into the project, these changes can be included in the environmental document without having to supplement the document, helping to ensure that the project remains on schedule.

Finally, one outcome could be that there is not a feasible solution to increasing bull trout populations in Gold Creek. If that is the case, it shouldn't be judged as a "failure" on anyone's part, rather a cold reality that the habitat can't support bull trout. Money should not be spent on this project unless there is a high degree of confidence that a solution exists for improving bull trout populations in Gold Creek. This is why I am stressing quantifiable solutions. I respectfully request that this document and graphic is included in the project scoping record.

Bruce Nebbitt

Nonpublic information

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[Forest Service note: Due to formatting constraints, the referenced image could not be converted to text. The commenter provides narrative description in the text above. Image is available for review in the original document.]

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