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Organization:

Title:

Comments: April 30, 2024

RE: Comments to Gold Creek Draft NEPA Environmental Assessment

To: USFS Patty Garvey-Darda and Scott Robinson

We are landowners in a recreational cabin community in Gold Creek Valley and Sandy has also spent a large part of her career on watershed restoration and salmon recovery. It is our hope that this project will successfully result in the restoration of the creek and the recovery of this bull trout population. We appreciate the breadth, scope, and detailed planning of the restoration project as reflected in the Draft NEPA Environmental Assessment (hereafter "EA"). With that said this is a large and long project. We hope comments in this letter will help the project be successful for fish, environment, recreationalists, and landowners.

We are thankful for the high level of analysis and engineering that went into the creek restoration design and the use of ELJs, restoration planting and other activities to improve Bull Trout habitat. We support that the Creek restoration design references directing water away from STVMA community and ensuring there is no increased risk of flooding. Thank you for your work with the community over the past many years as this project has been developed.

We also appreciate the restoration of the wetland in the Gold Creek Pond area and the thoughtful approach to building trails in that area. The final design and a fully restored wetland will be a significant value to this ecosystem.

Given the size and long timeframe for this project it will be critical for the USFS and your contractors to have close cooperation/communication with landowners before, during, and after the project.

We respectfully make the following comments to the project NEPA EA for your consideration and response in hope that these comments support a successful project during and after construction.

Trees: Numerous documents reference removing trees but we could not find an estimate of how many you propose to cut during the whole project. Although we recognize this is a restoration project, we would like to understand how many trees are planned to be removed and where in the project site. We are specifically interested in more detail on tree removal on access road and around Heli's Pond. Can you provide your project estimate of the number of trees expected to be removed and a map showing what locations in the whole project site?

Noise: Although we read your conclusion of no noise impacts during the project, we couldn't find data and analysis in document that lists how many trucks and large equipment will be used and for how many trips. As a landowner and a neighbor that will be accessing the area regularly and that fronts Chikamin Road (which will be used for access to parts of the project) we would like to understand how many trucks and other equipment will be going back and forth over the 10-year period and during what phases of the project. Additionally, in conversations with the project proponents we heard that the project team plans to work 7 days a week from dawn to dusk for the whole construction season, every year. Please help us understand if that type of schedule would result in significant decrease in the project timeline (which would be welcome) or if you propose that schedule for the full 5-10 years. Can you share how the project proposes to minimize and mitigate noise impacts (over the 10 years) for both people and wildlife?

Fish: We have seen over many years that kokanee use the creek leaving Gold Pond. We think there is both

stocked and wild fish. We did not find reference to kokanee population in the EA document. The thesis paper titled "Early Life history and Stock Discrimination of Kokanee Salmon in an Alpine Lake Environment, Fall 2020, ScholarWorks@CWU" states that kokanee are an important food source for the bull trout in the Gold Creek system. Can you provide an explanation of why kokanee were not included in the project environmental assessment?

Lake Keechelus: The document provides strong modeling to show that Gold Creek Pond and Heli's Pond contribute to dewatering. We did not see references in the documents that discuss the effect of the lowering of Lake Keechelus on the dewatering. In addition, during the April 24 public meeting, the project representatives referenced that the "drawdown of Lake Keechelus coincides with the spawning season for bull trout." We want this project to be successful, help us understand how Lake Keechelus was addressed to help ensure the success of Bull Trout recovery.

Water Table: The EA page 27 - states that the water table will rise 7 feet north of Gold Creek Pond and up-valley. Can you explain if you are anticipating a water table rise around Heli Pond and adjacent private property, if so how much?

Heli Pond 30% design: The project plans to turn the outlet creek into a road to haul rock from the creek to the pond. Can you describe how much change will occur to the outlet creek and whether trees will be removed? In biological opinion page 57 it references only 102 shrubs will be planted for Heli Pond. That seems low given the disturbance to the surrounding area and the whole length of the outlet creek. We hope you can provide more restoration plantings to this important area.

Fill for ponds: Can you help us understand the total volume of fill planned for Gold Creek Pond. In the Heli Pond design it said Heli's pond would take 6600cy. We did not find the volume for Gold Creek Pond. The EA seems to indicate you will be using fill from the creek and Gold Creek Pond berm to fill the Pond, but during the public meeting the project team indicated the fill would actually come from outside the project area. We would like to understand how you are addressing the volume and source of fill and whether fill will be imported or exported off site.

Gates: The project anticipates the USFS will install a gate across the entrance to FS road 4832-142. Can we get clarity on how this gate will be managed? The EA references that the area would be closed but then also references people with a FS pass could "scan" and get in. Please clarify these issues.

The document states that "landowner access will remain unchanged" - We greatly appreciate that and would like to understand gate management of both any new gate and our existing STVMA gate during the project. Can you provide and work with the community on a road/community access management plan that addresses: (a) how local residents will be allowed access; (b) expectations regarding local road closures and any real-time notification system plans; and (c) expectations regarding managing heavy equipment and machinery-related congestion, etc.

We strongly support maintaining the current placement of the STVMA gate. The STVMA community has an agreement with the USFS to maintain this road and has done so keeping the road in excellent condition for years through volunteer hours and community effort. Please confirm there is no plan to remove the STVMA gate. We appreciate and support the project's emphasis on maintaining access for landowners to their cabins during the project construction periods. It is very important to the community that the gate remain locked whenever the road is drivable, except to let individual vehicles in, or during periods of time when it is being actively monitored by flaggers or traffic control persons. Effective management of the keys is also essential, and the community and the project team will need to carefully plan out meaningful protections. We would appreciate you providing us with a project's gate management plan, including key allocation, the planned use of flaggers or traffic control persons, etc.

Access Roads: The EA often refers to access roads. Can you clarify if you are mainly referring to the lower road that goes to the Gold Creek Pond parking lot or are you also referring to Chikamin Road through Starwater and STVMA? Please clarify which part of the access road is being used during which phases of the project.

The STVMA and USFS negotiated a 2006 Road Management Agreement whereby STVMA agreed to maintain the Forest Service road north of (beyond) the gate. The STVMA community has an agreement with the USFS to maintain this road and has done so keeping the road in excellent condition for years through volunteer hours and community effort. Please help us understand how much use, truck access, equipment access will be occurring on the USFS road north of the gate? Please describe the USFS plan to maintain the road and repair damage from heavy equipment, not just at the end of the project, but throughout every construction season.

Similarly, please confirm the project will cover the cost of repairing damage to the STVMA Chikamin Vista Road (and any other STVMA road the project utilizes). As a landowner that fronts Chikamin Vista Road, we would appreciate learning more details regarding the anticipated use of the road, the road repair strategy, including frequency, costs, and efforts to mitigate impacts to local residents.

In the EA in appendix B you discuss the issue of water crossing the access road and washouts. Appendix B page 12 and 13 state that you will be 1) replacing culverts with oversized road/stream crossing culvert; 2) design rock armored dips in the road; 3) armoring the roadside ditch with pit-run rock; and 4) may do some road widening. The EA was not clear on where along the access road this work would occur. Please provide a map with specific locations for each type of work and analysis of need and clarify when in the 5-10 year construction period this road work would occur. Please describe and provide a map on how and where you plan to widen road and whether this will remove trees along the access road? In the 90% design document (page 57) it references that you will be planting 901 trees and shrubs at end of project along the access road, indicating a fair amount of disturbance. Can you clarify what year in the project the road disturbance will be and when the restoration would occur?

We know there has been a lot of coordination with the community members. It would be beneficial for the project and construction to spend more time talking to landowners who have been there for 20-40 years about what we have seen with the water flow and the road. It is not clear the extent of the proposed dips in the road but they seem unnecessary and would impact car access in summer and winter ski access by channeling water and melting snow. Culverts are preferred over any rock armored dips. Please provide more justification of the need for this type of work.

The STVMA community has supported keeping the Gold Creek Pond Forest Service road unplowed during the winter beginning at the frontage road, the establishment of the snow berm that blocks vehicles in winter, and important signage. Please confirm there will be no snow plowing of the Gold Creek Pond access road beyond the frontage road (road 4832) for construction access or activities.

Public Access: The EA Page 32 bottom says 5-10 years of construction and year round. Private landowners utilize their property in the winter and would need to still have parking on the frontage road. While we see a few references to winter recreation remaining open, we do not see necessary details to fully understand what areas will remain open for winter recreation, what changes, if any, will be required, etc. Please provide a comprehensive plan of what will be done to manage winter recreation, including any changes to today's protocols (including access, parking, porta-potty placement, etc.). It would help if you can clarify how the project will manage both the summer and winter access.

Recreational Impacts: This project will close one of the most popular trailheads for up to 10 years. The EA states that "other areas in the geographic context with similar opportunities would remain open", indicating people can go somewhere else. Gold Creek is a major recreation area in both winter and summer which has grown

significantly since pandemic. It is one of the most heavily used sno-parks in the state, and summer use is often hundreds of vehicles on a given weekend day. We did not find data or information showing the EA analyzed the extent of use of this area and how you propose to accommodate this use elsewhere. As summer hikers and nordic skiers who use the groomed trail sno-park areas at the Pass, we know that all of the other summer and winter recreation areas in the vicinity are already fully utilized. How do you propose to direct and accommodate the recreational closures that would extend for 10 years? Please share your analysis of the recreation impacts including your analysis of how many people are currently using Gold Creek and where you anticipate they will go? How will you notify recreation users? Can you explain what if any improvements you will make to surrounding recreation sites to accommodate the increases there?

We hope you will invest more resources on mitigating the real recreational impacts. Please consider improving and increasing parking and facilities at the other Snoqualmie Pass recreation areas. Consider building a parking area at the start of FS road 4832 where the Kendall Peak lakes trail is. Building off-road parking there for winter and summer use will help alleviate the problem. Please analyze increasing parking at Hyak and how you could direct users to Crystal Springs that seems to have ample parking. Please describe your analysis, discussion and how are you coordinating with the State Park Winter Recreation Sno-Park program and other adjacent USFS offices to address these issues.

Funding: The EA suggests that funding is not secured and the USFS will start project without funding for all elements. We support the project but we are concerned about lack of funding. Specifically could the lack of funding result in starting the project but not being able to finish it and therefore leaving the disruption, staging, etc.. longer than 10 years until you get funding? We hope all the money can be secured at the beginning. If it can't what is the plan to wrap up the work and restore any disrupted sites.

Project Timeline: We appreciate that this is a large project, however the anticipation of up to 10 years of closure and active construction that disrupts access to and use of property seems overwhelming. Can you provide further details on why the extended length of this project and what are the factors that impact the timing of 5-7 to 10 years? What considerations and actions did you take to reduce the timing as much as possible? How does the environmental assessment of impact account for the 10 year period (which seems longer than temporary)? What is an alternative (and what would need to happen) for the project to be completed within the 5-year (or less) construction estimate?

Thank you for the opportunity to comment on the Gold Creek Restoration NEPA EA. The Gold Creek Valley is a special place that we want to thrive for generations to come. It is our hope that actions undertaken by this project will successfully result in the restoration of the creek and the recovery of this bull trout population. We also hope comments in this letter will help the project be successful for fish, environment, recreationalists, and landowners.