Ski Tur Valley Maintenance Association (STVMA)

1 May 2024

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: STVMA comments on Gold Creek Valley Restoration Project, Draft EA

Dear Patty Garvey-Darda,

Ski Tur Valley Maintenance Association ("STVMA") is a recreational cabin community along Gold Creek, about two miles southeast of Snoqualmie Pass, where much of the in-stream Gold Creek Restoration project is located.[1] We have a long history of engagement with KCT, NSD, USFS, WDFW, and other agencies and groups that support the Gold Creek restoration project, and we look forward to strengthening these relationships even further as we collaborate on this project. The STVMA board of trustees appreciates the breadth, scope, and detailed planning of the restoration project as reflected in the Draft Environmental Assessment (hereafter "EA").

STVMA community members are environmentally minded and are committed to strong ecological values in the Gold Creek valley. For example, a number of our members join with other volunteers, including Yakama Nation tribal members, each dry season to help rescue stranded Gold Creek bull trout. We also acknowledge, and respect, that our property is on the Yakama Nation's ancestral fishing and hunting land in the upper reaches of the Yakima river.

We are first-hand observers of the impact that logging and other human activities have had in the area. During the 57 years of STVMA, the creek has unquestionably widened,

[1] STVMA owned property appears on Sheets 16, 17, and 18 of the draft 90% plan released on April 2, 2024.

and our community has lost significant land as a result. As such, the STVMA has a particularly strong interest in preserving its riverbank and lessening erosion and creek-migration threats to land and cabins.

From our review of the EA, our community recognizes that we share many of the same environmental priorities with this effort, and we are encouraged by the careful thought given to each of them. We also appreciate that the project leaders have a clear recognition that this project is not only environmentally important but will also have a significant and prolonged impact on all those who spend time in the area, including day visitors and recreational cabin owners like ourselves.

The EA specifically addresses and raises a number of issues important to our community. We respectfully make the following comments to the EA for your consideration and response. For simplification, we have divided the topics into two general areas, the first (Section A) being those topics that we support and where we want to highlight our agreement with what is presented in the EA, and the second (Section B) being those topics where we have concerns or want to emphasize specific aspects. Within each of these two areas, we also call out a general subject area for each topic to help further organize our response.

Section A: STVMA recognizes and supports these EA topics:

1. Mitigate Creek Vulnerabilities: STVMA supports stabilization of the creek bank and the riparian consequences that follow. We understand that creek and bank stability, while primarily to help bull trout, will also benefit a diversity of species and our community.[2] We believe the logjam design will help stabilize the creek.

2. Enhance Riparian Ecology and Wildlife: We applaud the establishment and enhancement of riparian areas throughout the project. Additional riparian areas help not just the bull trout, but other wildlife as well.

3. Re-Vegetation: We welcome the project's comprehensive replanting plan, and support its re-vegetation along the creek bed, in and among the ELJs, and up and down Gold Creek. Some community members have expressed an interest in

[2] In 2022, some STVMA members began the process of attempting to permit placement of some large wood in the stream ("the deflector project") to stop erosion and threats to cabins in the middle area of STVMA. The engineering required, permitting, and the possible costs, however, were well beyond the ability of the community to finance. That private project is on hold. Members of the community are hopeful that the instream project will be completed in the earlier stages of the many-year-long overall project.

participating in local land stewardship, and may be willing to help monitor or care for the plantings.

4. Design of Logjams: STVMA and its members have worked with KCT, NSD, the USFS, and other agencies in past years to understand the project, and have met many times with representatives starting near the beginning of the planning for the project. The project designs logjams in a way that mimics the function of natural logjams, and STVMA appreciates this approach; it also relies upon the engineering expertise that secures the installations in a safe and permanent manner. STVMA appreciates the high level of analysis and engineering that went into the EA.

5. Maintaining the Present Location of the Gate: STVMA strongly supports maintaining the current placement of the gate. Location of the STVMA gate has a long history. When it was on our property, its placement beyond the Forest Service road ownership attracted overuse of the road, resulted in crowded and awkward parking on private land and frequently stuck vehicles not able to turn around, cabin break-ins, and cabin owners blocked from getting to their property. Additionally, the current placement of the gate directs Gold Creek Pond traffic to publicly accessible areas, and it should not be removed.

6. Maintaining Snow on the Gold Creek Road in Winter: The STVMA community has supported keeping the Gold Creek Forest Service road unplowed during the winter beginning at the frontage road, and the establishment of the snow berm that blocks vehicles. Blockage prevents trucks and cars from tearing up the snowy road, which makes it difficult for snowshoeing, walking, skiing, and local snowmobile use. STVMA supports the status quo and requests that there be no snow plowing of the road beyond the frontage road (road 4832).

Section B: **STVMA expresses concerns and seeks better understanding regarding the following EA topics:**

7. Resident Access During Construction: STVMA appreciates and supports the project's emphasis on maintaining access for STVMA landowners to their cabins during the project construction periods. Yet, given the critical importance of this to our community we request a road/community access management plan that addresses: (a) how local residents will be identified and 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.

8. Managing the Gate: It is very important to the community that the gate remain locked whenever the road is drivable, usually from May through November, except to let individual vehicles in, or during periods of time when it is being actively monitored by flaggers or traffic control persons. Uninvited vehicles may otherwise be locked in, and project supplies and equipment would be at risk, as would cabins. Effective management of the keys is also essential, and the community and the project 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.

9. Maintenance of the Road North of the Gate: In the mid-2000s, STVMA negotiated an agreement with the Forest Service to place the gate in its current location. In return, STVMA agreed to maintain the Forest Service road north of (beyond) the gate. See 2006 *Road Management Agreement.* STVMA requests the project take over maintenance responsibility of the Forest Service road during construction. Afterward, STVMA sees no reason why it cannot resume maintenance of the road once again. This may be reflected in a new temporary road maintenance agreement.

10. Maintenance of Roads Inside STVMA: Large or heavy trucks passing along Chikamin Peak Road through STVMA to the Heli's Pond area could degrade the road even to the point that small vehicles may not pass easily. STVMA asks that the project bear the cost of repairing damage to the STVMA Chikamin Peak Road (and any other STVMA road the project utilizes), so that travel inside STVMA in smaller vehicles will not be seriously impaired. The project should agree to be accountable for damage to any roads, infrastructure or landscape that it causes, and make necessary repairs. We would appreciate learning more details regarding the anticipated road repair strategy, including frequency, costs, and efforts to mitigate impacts to local residents.

11. Frequency of large and heavy trucks passing through STVMA: While we understand that fill material for Heli's Pond would be transported directly from the west side of the creek and thus not passing through STVMA property, it is not as clear to us how often heavy trucks will be passing through our community. We request clear details describing heavy truck traffic through STVMA, including specific related projects that will require it, frequency (number of trucks) of large, heavy truck passage, and all plans to mitigate related noise, dust, and road damage within our community.

12. Damage to Water Lines: Similarly, heavy usage of Chikamin Peak road and other roads may damage or break STVMA water lines that pass under the road. Advance

planning and cooperation may help minimize that risk. The project will need to agree to repair any resulting damage to STVMA waters lines or utilities. Please confirm and provide as many additional details related to your anticipated impact and any pro-active mitigation efforts that are being planned.

13. Time of Work, and Safety of Work: STVMA requests that the project negotiate with us reasonable work hours. Similarly, safety standards should be maintained for the safety of STVMA residents as well as project personnel. Please provide specific work plans, including hours and duration, days of week, etc., so that we can better anticipate (and discuss) how to mitigate and accommodate this impact.

14. Berm Near Heli's Pond: STVMA has a road south of Heli's Pond along a berm (the "Burn Pile road") which channels the Heli's Pond outlet, and defines the northern boundary of STVMA. This road is part of a piece of land that STVMA received in 2009. The road should appear on the 90% design maps, sheets 18 and 23. The plan appears to indicate both placement of fill and planting in or near the STVMA Burn Pile road. Please provide the community with a better understanding of what is being planned (including motivation for placing fill, etc.). Regardless, that road is STVMA property and provides access for the community to maintain the berm, which should be understood and respected by the project.

15. Maintaining Access for Landowners and Emergency Vehicles Between the Frontage road and the Current Gate: The EA shows a new temporary gate near the Gold Creek Pond parking lot, which implies possible public access to this point. As such, we are concerned that public parking along the road up to the gate would make access very challenging for construction vehicles, emergency vehicles, and landowner access. To avoid over congestion, it would be helpful if public parking was prohibited on the forest service road between the frontage road and the gates. Please provide us clear and detailed information on road (by section) area closures, restricted access points, and plans as to how such restrictions will be enforced.

16. Winter Recreational Access on Gold Creek Road: As noted above, STVMA has supported keeping the Gold Creek Forest Service road unplowed during the winter beginning at 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, plowing of frontage road, signage, parking, porta-potty placement, etc.)

17. Long term Maintenance of Project: For the success of any large project such as this, the project should have long-term maintenance built into the project. STVMA requests that you provide us with your current plans for post-project maintenance (extending for at least 10 years beyond completion) should there be any unexpected or detrimental changes.

18. Construction Easement, Communication, and Other Issues (project related): STVMA will work with the project on a right of way easement, defining route locations, and determining potential problems and solutions as they arise. The project and STVMA must establish clear communication channels with points of contact, and the project should provide periodic timelines and schedules for work so that STVMA is well informed. Contractors should name STVMA as an "additional insured" for work on STVMA land. There may be other practical construction issues of this nature that arise and will need to be agreed upon. Please provide comprehensive and related details regarding easements, routes (including number of vehicles and duration of use), and project communication plans during active project work.

19. Barbs (project related): We request that if any existing STVMA barbs in Gold Creek (near RM 1.4, on page 16 of 90% design) are removed, that they be replaced with equal or superior barbs or logjams. We request a description of how the replacement barbs or logjams will improve upon the existing barbs, which have worked well to stabilize the riverbank. Please also include any modeling results that indicate or support the need to remove and replace these barbs.

STVMA thanks the project for its consideration of these and other issues. We very much look forward to working with the USFS, Yakama Nation, KCT, NSD,WDFW, and others in the coming years.

Respectfully,

Brad Colman, President
Sue Landgren, Vice President
Dana Cogswell, Trustee, and Co-Chair, Gold Creek Stewardship Committee

Ski Tur Valley Maintenance Association (STVMA)