INDEX-GALENA ROAD
MILEPOST 6.4 – MILEPOST 6.9

Snohomish County, Washington

Finding of No Significant Impact

April 2017

U.S. Department of Transportation
Federal Highway Administration
Index-Galena Road  
(Milepost 6.4 – Milepost 6.9)  
Snohomish County, Washington

Finding of No Significant Impact

By the

U.S. Department of Transportation
Federal Highway Administration

Pursuant to

42 U.S.C. 4332 (2)(c) and 23 U.S.C. 128 (a)

The Federal Highway Administration (FHWA) has determined, in accordance with 23 CFR 771.121 and 40 CFR 1500-1508, that the proposed project will have no significant impact on the environment and therefore preparation of an Environmental Impact Statement (EIS) is not required.

This Finding of No Significant Impact (FONSI) is based on the Environmental Assessment (EA) (incorporated by reference) and other documents and attachments, as itemized in this FONSI. These documents have been independently evaluated by FHWA and are determined to accurately discuss the project purpose, need, environmental issues, impacts of the proposed project, and appropriate mitigation measures. The EA, along with the comment response matrix included in this FONSI provide sufficient evidence and analysis for determining that an EIS is not required.

FHWA takes full responsibility for the accuracy, scope, and content of the EA, as modified by this FONSI and the referenced documents.

04/14/2017

Date of Approval

Daniel M. Mathis, Division Administrator
U.S. Department of Transportation,  
Federal Highway Administration
The Federal Highway Administration (FHWA) and the Washington State Department of Transportation (WSDOT) assure full compliance with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987 and related statutes by prohibiting discrimination based on race, color, national origin and sex in provision of benefits and services. For more information about Title VI, please call the WSDOT Title VI Coordinator at (360) 705-7098.
Description of Proposed Action

The Federal Highway Administration (FHWA), Washington State Department of Transportation (WSDOT), and Snohomish County Public Works, issued an Environmental Assessment (EA) on September 19, 2016. The project will construct a relocated roadway that will extend from an area in proximity to the lower washout at Index-Galena Road Milepost 6.4 to an area in proximity to the upper washout at Milepost 6.9. The roadway will be relocated landward from the North Fork Skykomish River outside of the floodplain and channel migration zone. The roadway is located in unincorporated Snohomish County, Washington upstream from the town of Index. The relocated roadway will re-establish roadway connectivity on Index-Galena Road for residences, emergency service providers, recreationists, and land managed by the U. S. Forest Service.

The improvements will include shifting the existing roadway alignment to the south away from the river to establish a relocated roadway upslope from the existing damaged roadway. At the beginning point of the relocation, the roadway will ascend the sideslopes at a 9 percent grade to raise the roadway out of the 100-year floodplain and channel migration zone. To accommodate the re-alignment, the project will require extensive soil excavation and would place fill in other areas. A new Index-Galena Road/Trout Creek Road intersection would be constructed to allow for future continued use of Trout Creek Road by the U.S. Forest Service to carry out its long-term land management plans in the Trout Creek sub-basin. The relocated roadway will cross sideslopes and parallel the existing roadway. Non-fish bearing streams will be crossed by the alignment. A new 180-foot bridge with a deep drilled-shaft foundation will be constructed at a stream crossing near Station 54+00, at the east end of the project.

The proposed roadway design is based on design standards contained in the 2001 AASHTO Guidelines for Geometric Design of Very Low-Volume Roadways (ADT < 400). The use of these design standards responds to comments made by the public during the NEPA scoping period to consider use of design standards that would help to reduce the footprint of the proposed roadway relocation repair.

The proposed design will include a pavement width of 22 feet with 10-foot travel lanes and 1-foot shoulders. Additional land area will be required to install guardrail where warranted. The roadway posted speed limit will be 35 MPH.

During the final design process, a Practical Design effort will be undertaken to determine if there are other design measures that can reduce project impacts and costs. Practical design measures could include alignment refinements and other design modifications.

The proposed project’s new alignment on U.S. Forest Service lands in the Mt. Baker-Snoqualmie National Forest will require a new right-of-way easement from the
U.S. Forest Service to Snohomish County through FHWA. The existing right-of-way easement would be combined with the new easement area and includes the damaged roadway that will be decommissioned and restored where feasible to natural riparian conditions. The restored areas and adjacent areas downslope from the roadway will be used for roadway stormwater runoff dispersion and will be permanently protected from future development.

Once the decommissioned roadway surface is removed, soil decompaction and placement of organic materials, including forest duff salvaged during clearing and grading, will prepare the site for restoration planting. This riparian mitigation will restore a forested riparian corridor adjacent to the North Fork Skykomish River. Where planting is not feasible, natural riparian conditions will be restored with the asphalt removal. Large woody debris will be placed to enhance in-stream habitat and will be placed within restoration areas to enhance wildlife habitat.

**EA Coordination and Comments**

An open house /public hearing was held on Wednesday October 12, 2016. The meeting date occurred on the 23rd day of the 42-day public comment period. The legal ad notice of the availability of the Environmental Assessment was published on September 18, 2016. The legal ad was followed by display ads published on the dates provided below. A postcard notice mailing was sent to the project’s mailing list that was developed at the project onset and modified with new recipients as project development progressed. This mailing list includes 1,032 recipients.

The Notice of Availability of the EA and Notice of EA Public Hearing was advertised in the following newspapers on the following dates:

- The Herald (Everett), September 18, 2016 (Legal Ad)
- Monroe Monitor, October 4, 2016 (Display Ad)
- The Herald (Everett) October 7,8,9, 2016 (Display Ad)

The hearing was held at Frank Wagner Elementary School at 115 Dickinson Road in Monroe, Washington. There was no formal presentation. The open house format provided for informal drop-in attendance by the public. Attendees were greeted by Snohomish County Communications staff at the sign-in table and were provided with handouts. The public was encouraged to view exhibits at informational stations staffed by Snohomish County Design and Environmental staff. A Court Reporter was available to accept oral comments for those who wanted to provide comments in a more formal manner. It was explained that these oral comments would be summarized in a hearing transcript. Comment forms were also provided for those who wished to provide written comments. Meeting attendees were encouraged to provide comments in the way that they preferred. Comments on the EA and the project in general were accepted until October 31, 2016, which was the end of the comment period.
Copies of the NEPA EA and Notice of Availability were mailed directly to agencies and other groups noted in Appendix D of the NEPA EA, including public libraries in Sultan, Monroe, and Skykomish. In addition to the notice formats described above, a copy of the NEPA EA and project discipline reports were posted to the project website. Additional notice of the EA’s availability and October 12, 2016 meeting was provided by posting onsite notices at two locations in the project area, one at the lower Milepost 6.4 washout and one at the upper Milepost 6.9 washout.

More than 50 people attended the scheduled informal two-hour and a half open house public hearing. A total of 44 people signed the sign-in sheets. A total of 11 people offered written public comments on the comment forms provided at the meeting. Thirteen persons elected to provide oral comments to the court reporter at the public meeting.

In addition to comments received at the public meeting, comments were received in the mail and through e-mail transmittal. At the conclusion of the comment period, 11 letters were received in the mail and 465 e-mails.

**Summary of Comment Forms**

Of the 11 comment forms submitted at the meeting, 8 were submitted by meeting attendees who either identified themselves as residents on Index-Galena Road or who reside or work in nearby Index. The remaining three respondents identified themselves as recreational users of the area. Copies of the comment forms are provided in Appendix 4 of this FONSI. While none of the comments in the comment forms directly addressed the content of the NEPA Environmental Assessment, there were concerns identified with regard to the proposed Index-Galena Road Milepost 6.4-6.9 project. These comments generally focused on:

- Having the project constructed in as timely a manner as possible to restore roadway access to residential properties and recreational areas.
- Restoring access to the area to promote recreation tourism for its economic benefit to surrounding areas.
- Frustration with the length of time it has taken to get to this stage of the project and eventual project completion
- Ongoing damage to Index-Galena Road that further threatens access to residential properties.

Responses to comments are included in the Responses to Public and Agency Comments Received September 19-October 31, 2016 matrix table provided in Appendix 4.
Summary of Comments to the Court Reporter

A transcript of the submitted oral comments was prepared by the Court Reporter and provided to Snohomish County. The oral comments were similar in nature to the comment forms that were submitted in that very few comments addressed the NEPA Environmental Assessment content. A copy of the transcript is provided in Appendix 3. The responses to transcript comments are included in this FONSI in the Responses to Public and Agency Comments Received September 19-October 31, 2016 Matrix provided in Appendix 4.

E-mail Comments

The largest number of comments were provided through e-mail transmittal, totaling 463 in support of and 2 opposed to the project. Due to the large volume of e-mails voicing support of the project, their general concurrence with the analysis provided in the NEPA EA, and similarity of comments based on a template used by recreation organizations for their members, a summary of the comments in favor of the project is provided below in lieu of individual responses in the comment response matrix. The e-mails that were received have been copied, for reference, to a disk provided at the back of this FONSI.

Summary of E-mails Voicing Support for the Project

The large number of e-mail comments voicing support for the project is the result of recreational advocacy organizations notifying their respective memberships of the NEPA EA being available for review and informing them that there was an opportunity to comment. The general framework of the comments included:

- Strong support for repairs to Index-Galena Road.
- Statements that Index-Galena Road is a vital transportation link to the upper North Fork Skykomish River area, and that the proposed repairs will restore access for hiking and other recreational activities along the North Fork Skykomish River.
- Identification of the current 42.5 mile detour up the Beckler River Road and over Jack’s Pass as an inconvenience to hikers interested in accessing popular trails like West Cady Ridge, Quartz Creek, North Fork Skykomish and many others, and is also risky for travelers.
- General agreement with the analysis in the Environmental Assessment that the project will have many positive benefits including restoration of roadway connectivity, relocation of the road out of the 100 year floodplain and channel migration zone, and a footprint that will minimize vegetation clearing and land disturbance.
- The project will also be beneficial for the river's scenic values, recreation, fish, and wildlife that collectively make the river suitable for Wild and Scenic River designation.
- Support for the Preliminary River Access Plan and Conceptual Design presented as Appendix G in the NEPA EA.
Summary of E-mails Not Voicing Support for the Project

The two e-mails that were sent voicing opposition to the project expressed the opinion that the road should not be replaced, since the commenters wanted more areas left for only non-motorized use.

Comment Letters

Eleven comment letters were received. The majority voiced general support with some letters commenting on particular aspects of the NEPA EA review. Some voiced opposition to the project. Copies of the comment letters and the responses are included in Appendix 4.

Determinations and Findings

National Environmental Policy Act (NEPA) Finding

The FHWA has evaluated the project's impacts in accordance with 40 CFR 1508.27 and determined they are not significant. The project is located in a forested area with rugged topography and steep slopes. Index-Galena Road provided access to private properties, campsites and trailheads in the Mt Baker Snoqualmie National Forest prior to being washed out by the North Fork Skykomish River. The project will re-establish connectivity for residents, emergency service providers, and recreational users of the surrounding US Forest Service land.

The project will shift the roadway alignment upslope from the river, removing it from the 100-year floodplain and channel migration zone. While the new construction will require earthwork and vegetation removal, as well as bridge construction, the environmental effects will be short-lived and mostly confined to the immediate project area. The end result will be a facility that will be more resilient to future flood events, and will reduce impacts on the river. The project will restore the riparian habitat along the river. It will also restore access to private properties and improve emergency response times. Overall, the adverse impacts of the project will be limited and will not cause lasting or severe harm to the surrounding environment, and will be outweighed by the long-term benefits the project will provide.

There is considerable public support for the project, and very limited opposition, as detailed in the summary of public comments received.

The project area does not include any park lands, historical resources, prime farmlands, wild and scenic rivers, or ecologically critical areas. Consultation with USFWS and NMFS under the Endangered Species Act has been completed and the project will implement the terms and conditions in the Biological Opinions, which will incorporate best management practices and conservation measures to minimize the potential adverse effects on threatened and endangered species. The project has
minimal wetland impacts and those impacts will be mitigated through purchase of mitigation bank credits. Consultation with the US Coast Guard determined that this river is not within their jurisdiction and the project will not require a Bridge Permit.

Analysis of the cumulative and indirect impacts of this project and other reasonably foreseeable actions in the project area did not identify any significant cumulative or indirect impacts. The surrounding area is owned and managed by the US Forest Service.

The record provides sufficient evidence and analysis for determining that an EIS is not required. The impacts analyzed and disclosed in the EA are largely site-specific, short duration, and low intensity in the context of the environment they will affect. Therefore, it is reasonable to conclude that they are not significant as defined by 40 CFR 1508.27.

Section 106 Compliance

Section 106 of the National Historic Preservation Act of 1966, as amended, requires the review of federally assisted projects for impacts to districts, sites, buildings, structures, and objects listed in, or eligible for inclusion in, the National Register of Historic Places.

Based on the cultural resources analysis, consultation with the Tribes and SHPO, FHWA finds that no historic properties will be affected and that the Section 106 coordination and consultation requirements for this project have been fulfilled.

Section 4(f)

Section 4(f) of the Department of Transportation Act of 1966, codified at 49 U.S.C. 303, declares a national policy that a special effort should be made to preserve the natural beauty of the countryside, public park and recreational lands, wildlife and waterfowl refuges, and historic sites. The Secretary of Transportation may not approve transportation projects that require the use of land from a significant publicly owned park, recreation, area, wildlife or waterfowl refuge, or any significant historic sites unless a determination is made that (i) there is no feasible and prudent alternative to the use of the land; and (ii) the action includes all possible planning to minimize harm to the property resulting from such use (23 CFR 771.135).

The project will not use any eligible 4(f) properties therefore further analysis is not required.

Endangered Species Act

The Endangered Species Act of 1973 (ESA), as amended, is intended to protect threatened and endangered species and the ecosystems on which they depend. The ESA requires a federal agency to ensure that any action it authorizes, funds, or carries out is not likely to jeopardize the continued existence of any listed species or
result in direct mortality or destruction or adverse modification of critical habitat of listed species.

A biological assessment (BA) was prepared as required under Section 7(c) of the Endangered Species Act. Based on the BA, FHWA has determined that the project activities, as proposed, *May Affect, and are Likely to Adversely Affect* the following species:

- Chinook salmon (*Oncorhynchus tshawytscha*)
- Steelhead trout (*Oncorhynchus mykiss*)
- Bull trout (*Salvelinus confluentus*)
- Northern Spotted Owl (*Strix occidentalis caurina*)
- Marbled Murrelet (*Brachyramphus marmoratus*)

Impacts to critical habitat for these species included the following:

**May Affect, Not Likely to Adversely Affect**
- Chinook salmon (*Oncorhynchus tshawytscha*)
- Steelhead trout (*Oncorhynchus mykiss*)
- Bull trout (*Salvelinus confluentus*)

**No effect**
- Northern Spotted Owl (*Strix occidentalis caurina*)
- Marbled Murrelet (*Brachyramphus marmoratus*)

FHWA has also determined that the project will *adversely affect* essential fish habitat (EFH) of fish species covered under the Magnuson-Stevens Fisheries Conservation Act.

FHWA has also determined that the project activities, as proposed, warrant an effect determination of **No Effect** on Grizzly Bear, Canada Lynx, Gray Wolf, Oregon Spotted frog, and Yellow-Billed Cuckoo.

FHWA consulted with NOAA Fisheries and USFWS. NOAA Fisheries issued a Biological Opinion December 15, 2016. USFWS issued a Biological Opinion February 14, 2017. Project mitigation measures such as Best Management Practices outlined in the BA, and adherence to terms and conditions identified in the Biological Opinions, will ensure that ESA requirements are met. Copies of the Biological Opinion documents are provided on the disk provided with this FONSI.

**Magnuson-Stevens Act Finding**

The Magnuson-Stevens Fisheries Conservation and Management Act (16 USC § 1801 et seq.) requires federal fisheries management regulations to identify and
conserve habitat that is essential to federally managed fish species. Essential fish habitat is defined as “those waters and substrate necessary to fish for spawning, breeding, feeding, or growth to maturity.”

Based on information in the BA and the analysis of effects presented in the ESA portion of this document, NMFS concluded in a BO dated December 15, 2016 that the proposed action will have temporary adverse effects to EFH during the construction period. The FHWA finds, and NOAA Fisheries concurs, that because the habitat requirements (i.e. EFH) for the MSA managed species in the project are similar to that of the ESA-listed species, and because the conservation measures that the FHWA/Snohomish County/ WSDOT included as part of the proposed action to address ESA concerns are also adequate to avoid, minimize, or otherwise offset potential adverse effects to designated EFS, conservation recommendations pursuant to MSA are not necessary.

**Environmental Justice Findings**

Executive Order 12898 provides that "each federal agency shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minorities and low-income populations." The Department of Transportation's Order to Address Environmental Justice in Minority Populations and Low-Income Populations similarly requires and FHWA to explicitly consider human health and environmental effects related to projects that may have a disproportionately high and adverse effect on minority and low-income populations. It also requires them to implement procedures to provide "meaningful opportunities for public involvement" by members of these populations during project planning and development (DOT Order No. 5680.1).

FHWA finds that the construction and operation of the Index-Galena Road Milepost 6.4-6.9 Project will not have disproportionately high and adverse effects on low-income or minority populations. The proposed project will likely have beneficial effects on these populations by re-establishing through-route access that reduces travel distance to residential and recreation areas.

**Floodplain Findings**

Pursuant to Executive Order 1198 (Floodplain Management), floodplains were assessed within the 100-year floodplains and floodways defined by the Federal Emergency Agency (FEMA) and locations with reported flooding problems or within local floodplains managed by Snohomish County.

The FHWA finds that no adverse impacts to any 100-year floodplains or floodways would occur as a result of the proposed project.
Appendices

The Environmental Assessment and the EA public Hearing Transcript are incorporated by reference into this FONSI. Copies of both of these documents are available upon request from Snohomish County Public Works-Environmental Services, Crilly Ritz, Senior Environmental Planner, 3000 Rockefeller Avenue Administration Building West MS 607, Everett, WA 98201 [telephone 425-388-3488, ext. 4586].

The following appendices are incorporated into this FONSI:

1) FONSI Distribution List
2) Commitment List
3) Hearing Transcript
4) Copies of Comments Received and Responses
5) Disk including copies of e-mail comments and copies of the Biological Opinion documents.
To foster good lines of communication, enhance interagency coordination, acknowledge that this FONSI is a public document, and involve the public and Tribes in implementing NEPA procedures, the FONSI is sent to the entities below.

**Federal**

U.S. Army Corps of Engineers
U.S. Department of Commerce, National Marine Fisheries Service
  NW Regional NEPA Coordinator
Federal Highway Administration
Washington Division - Area Engineer; Environmental Program Manager
U.S. Department of the Interior, U.S.
  Fish and Wildlife Service; Environmental Review-Western Washington Fish and Wildlife Office
U.S. Environmental Protection Agency,
  Region 10-EIS Review Coordinator; Environmental Review
U.S. Forest Service, Mt. Baker-Snoqualmie National Forest – Supervisor’s Office;
  Skykomish Ranger District

**Tribes**

Tulalip Tribes
Sauk-Suiattle Tribe
Snoqualmie Tribe
Stillaguamish Tribe

**State**

Department of Archaeology and Historic Preservation
  State Historic Preservation Officer
Department of Ecology - SEPA Unit
Department of Fish and Wildlife – Habitat Program
Department of Natural Resources – SEPA Center
Department of Transportation
  Northwest Region Local Programs; Headquarters-Local Programs
Office of the Attorney General – Transportation Division
Washington Parks and Recreation Commission- Northwest Region Office

**Snohomish County**

Executive’s Office
County Council

Planning and Development Services
Public Works –
  Transportation & Environmental Services
Surface Water Management
Road Maintenance
Sheriff’s Department

Regional
Northwest Indian Fisheries Commission
Puget Sound Clean Air Agency
Puget Sound Partnership
Puget Sound Regional Council
Snohomish County Economic Development Council

Public Service Organizations
Snohomish County PUD #1
Index Fire District # 28

Schools
Index School District

Local
City of Index
Mayor

Media - Notices
Herald

Community Groups
Pilchuck Audubon Washington Trails Association
Sierra Club The Mountaineers
Sky Valley Chamber of Commerce The Wilderness Society
American Whitewater Washington Wild

Libraries
Skykomish Library – King County Library System
Monroe Library, Sultan Library - Sno-Isle Library System
University Of Washington Suzzallo Library
Appendix 2 Commitment List

Below are project mitigation commitments. A Preliminary Commitment List was provided in Appendix E of the Environmental Assessment. The commitments identified below are adopted as part of FHWA’s final decision on the proposed action and are listed to “assist with agency planning and decisionmaking” and to “aid an agency’s compliance with NEPA when no environmental impact statement is necessary” [40 CFR 1501.3(b) and 1508.9(a)(2)].

1. **Wetlands**: Snohomish County would compensate for unavoidable wetland impacts by use of an approved offsite mitigation bank and minimize wetland impacts by constructing a bridge near Station 54+00. Project construction affecting wetlands would be consistent with Army Corps of Engineers Section 404 permit requirements.

2. **Endangered Species Act (ESA)**: Snohomish County will coordinate with WSDOT biologists to review Endangered Species Act listings prior to construction to evaluate the need for further consultation with the U.S. Fish and Wildlife Service and the National Marine Fisheries Service. Biologists will also reevaluate the project should new listings of species or critical habitat occur during project construction. The project would be constructed consistent with terms and conditions identified as part of the Section 7 ESA consultation. These would include timing restrictions for certain project activities generating high noise levels such as clearing, grading, and blasting. In order to minimize impacts from noise to marbled murrelets flying along the river corridor, work would begin 2 hours after sunrise and stop 2 hours before sunset between April 1 and September 23.

Per the NMFS Biological Opinion FHWA shall:

1. Minimize incidental take resulting from worksite isolation and fish handling during construction activities.

2. Minimize incidental take resulting from elevated levels of turbidity resulting from construction activities.

3. Ensure completion of a monitoring and reporting program to confirm that this Opinion is meeting its objective of limiting the extent of take and minimizing take from permitted activities, per (50 CFR 402.14(i)(1)(iv) and (I)(3)).

The FHWA must fully comply with the following terms and conditions that implement the Reasonable and Prudent Measures (RPM) described above.
To implement RPM Number 1 (worksite isolation), the FHWA shall ensure that:

1. Intakes for all pumps used for the project have fish screens installed, operated, and maintained according to NMFS’ fish screen criteria (NMFS 2008) or equivalent.

2. Any fish trapped in the in-water work area before dewatering will be herded out or removed and released to suitable habitat as near to the capture site as possible in compliance with the WSDOT Fish Exclusion Protocols and Standards (2012).

3. ESA-listed fish are handled with extreme care, keeping fish in water to the maximum extent possible during seining and transfer.

4. If electrofishing equipment is used to capture fish, it shall comply with WSDOT Fish Exclusion Protocols and Standards (2012).

5. Electrofishing will not be used if water temperatures exceed 64 degrees F (18 degrees C), or are expected to rise above 64 degrees F, unless no other method of capture is available.
   
   i. Water quality conditions are adequate in buckets or tanks used to transport fish by providing circulation of clean, cold water, using aerators to provide dissolved oxygen, and minimizing holding times.
   
   ii. The NMFS, or its designated representative, are allowed to accompany the capture team during the capture and release activity, and to inspect the team’s capture and release records and facilities.

To implement RPM Number 2 (minimizing turbidity), the FHWA shall ensure that:

1. Erosion control activities, including minimization measures and BMPs, are monitored and corrective action will be taken if necessary to ensure protection of riparian areas and eliminate the potential for BMPs failing along the river.

2. An on-site representative will monitor water quality conditions during in-water work to monitor for exceedances beyond 300 feet, which would necessitate stopping activities until the plume dissipates.

To implement RPM Number 3 (monitoring), the FHWA shall ensure that all monitoring items will include, at a minimum, the following:

1. Project identification
2. Project name: Index to Galena Road Relocation and NMFS Tracking Number WCR-2015-3383.

3. FHWA contact person.

4. Construction details

5. Starting and ending dates of completed in-water construction.


7. A description of any elements of the project that were constructed differently than proposed.

8. Water quality monitoring reports.

9. Submit monitoring report to NOAA Fisheries, Attention Sean Callahan, 7600 Sand Point Way NE, Seattle, WA 98115.

Per the USFWS Biological Opinion FHWA shall:

1. Minimize and monitor incidental take caused by handling related to fish capture and removal operations.

2. Minimize and monitor incidental take caused by elevated turbidity and sedimentation during construction.

3. Monitor and report construction activities, including implementation of the seasonal work timing restrictions, removal of mature forest, and the frequency and duration of blasting operations.

The following terms and conditions are required for the implementation of RPM 1:

1. The FHWA, WSDOT, and County shall ensure that fish capture and removal operations are conducted by a qualified biologist, and that all staff participating in the operation have the necessary knowledge, skills, and abilities to ensure safe handling of fish. Fish capture and removal operations shall take all appropriate steps to minimize the amount and duration of handling. The operations shall maintain captured fish in water to the maximum extent possible during seining/netting, handling, and transfer for release, to prevent and minimize stress.

2. The FHWA, WSDOT, and County shall ensure that water quality conditions are adequate in the buckets or tanks used to hold and transport captured fish. The operations shall use aerators to provide for the circulation of clean, cold, well-oxygenated water, and/or shall stage fish capture, temporary holding, and release, to minimize the risks associated with prolonged holding.
3. The FHWA, WSDOT, and County shall only employ electrofishing if all other means of fish capture and removal have been determined impracticable, and only after a qualified biologist determines that adult and subadult fish have been effectively removed. Electrofishing methods shall use the minimum voltage, pulse width, and rate settings necessary to immobilize fish. Water conductivity shall be measured in the field before electrofishing to determine appropriate settings. Electrofishing equipment and methods shall comply with the electrofishing guidelines outlined by the NMFS (NMFS 1997).

4. The FHWA, WSDOT, and County shall provide notice to the Service’s consulting biologist (Ryan McReynolds, 360-753-6047) a minimum of ten days prior to fish capture and removal operations. Upon request, the FHWA and WSDOT shall permit the Service or its designated representative to observe fish capture and removal operations.

5. The FHWA, WSDOT, and County shall document and report all bull trout or other salmonids encountered during fish capture and removal operations. The FHWA and WSDOT shall submit a monitoring report to the Service’s consulting biologist (Ryan McReynolds, 360-753-6047) at the Washington Fish and Wildlife Office in Lacey, Washington, by December 15 following each in-water construction season.

The following terms and conditions are required for the implementation of RPM 2:

1. The FHWA, WSDOT, and County shall monitor turbidity levels in the North Fork Skykomish River during sediment-generating activities. Monitoring shall be conducted at a distance of 300 ft from sediment-generating activities.

2. Monitoring shall be conducted at 30-minute intervals from the start of sediment generating activities. If turbidities measured over the course of three consecutive 30-minute sample intervals do not exceed 5 NTUs over background, then monitoring of sediment-generating activities will be conducted for the remainder of the workday at a frequency of once every 6 hours, or if there is a visually appreciable increase in turbidity.

3. If, at any time, monitoring conducted 300 ft from sediment-generating activities indicates turbidity in excess of 5 NTUs over background, monitoring shall be conducted at 30-minute intervals until turbidity falls below 5 NTUs over background.

4. If turbidity levels measured at 300 ft from the sediment-generating activities exceed 50 NTUs above background at any time, 20 NTUs above background for more than 1 hour continuously, 10 NTUs above background for up to 7 hours, cumulatively, over a 12-hour workday, or 5 NTUs above background for more than 7 hours, cumulatively, over a 12-
hour workday, then the amount of take authorized by the Incidental Take Statement will have been exceeded. Sediment-generating activities shall cease, and the FHWA shall contact the Federal Activities Branch at the Washington Fish and Wildlife Office in Lacey, Washington (360-753-9440) within 24 hours.

5. Monitoring shall be conducted to establish background turbidity levels away from the influence of sediment-generating activities. Background turbidity shall be monitored at least twice daily during sediment-generating activities. In the event of a visually appreciable change in background turbidity, an additional sample shall be taken.

6. If, in cooperation with other permit authorities, the FHWA or WSDOT develop a functionally equivalent monitoring strategy, they may submit this plan to the Service for review and approval in lieu of the above monitoring requirements. The strategy must be submitted to the Service a minimum of 60 days prior to construction. In order to be approved for use in lieu of the above requirements, the plan must meet each of the same objectives.

7. The FHWA, WSDOT, and County shall submit a monitoring report to the Washington Fish and Wildlife Office in Lacey, Washington (Attn: Ryan McReynolds, Federal Activities Branch), by December 15 following each construction season. The report shall include, at a minimum, the following: (a) dates, times, and locations of construction activities, (b) monitoring results, sample times, locations, and measured turbidities (in NTUs), (c) summary of construction activities and measured turbidities associated with those activities, and (d) summary of corrective actions taken to reduce turbidity.

The following terms and conditions are required for the implementation of RPM 3:

1. When developing final plans for construction, the FHWA, WSDOT, and County shall include enforceable contract specifications to ensure full and successful implementation of the agreed-upon conservation measures.

2. The FHWA, WSDOT, and County shall prepare a schedule in advance of each year’s construction activities. The schedule shall outline and communicate seasonal and day/night work timing restrictions, with reference to specific work and staging locations. The FHWA and WSDOT shall provide the schedule to the selected Contractor(s) and work cooperatively to refine and adaptively manage implementation of the schedule, including contingencies.

3. The FHWA, WSDOT, and County shall conduct a field review of work and staging locations in advance of each year’s construction activities. The FHWA and WSDOT shall assess the limits of construction, and identify
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and confirm that work and staging will not result in impacts to mature stands or trees providing suitable habitat for the marbled murrelet; i.e., trees or stands exhibiting high canopy closure, with a multi-storied canopy providing good vertical and horizontal cover, and lateral limbs providing a 4 inch diameter (minimum) nest platform (located 33 or more ft off the forest floor).

4. If a field review of the limits of construction identifies trees providing suitable marbled murrelet nest platforms, the FHWA, WSDOT, and County shall notify the Service at their earliest convenience. The FHWA, WSDOT, and County shall coordinate with the Service to positively confirm the absence of nesting marbled murrelets and/or postpone clearing until after the marbled murrelet nesting season.

5. The FHWA, WSDOT, and County shall monitor and report the frequency and duration of blasting operations.

6. The FHWA, WSDOT, and County shall prepare, and provide to the Service no later than December 15, a summary of each year’s construction activities. The summary shall describe implementation of the seasonal and day/night work timing restrictions, and any schedule/construction contingencies and adaptive management. The summary shall describe the frequency and duration of blasting operations.

7. All materials for submittal to the Service shall be sent to the Washington Fish and Wildlife Office in Lacey, Washington (Attn: Ryan McReynolds, Federal Activities Branch).

3. **Stormwater Treatment**: Snohomish County would provide natural dispersion as the method to provide stormwater treatment for roadway stormwater runoff. Stormwater treatment will be designed according to the most recent Highway Runoff Manual.

4. **Erosion Control**: Snohomish County will develop a Stormwater Pollution and Prevention Plan (SWPPP) including temporary erosion and sediment control measures in compliance with the project’s Construction Stormwater General Permit and Snohomish County Land Disturbing Activity requirements. The SWPPP will be included in the construction contract documents.

5. **Geology and Soils**: Snohomish County will construct retaining walls, reinforced soil slopes and other features as required to stabilize roadside soils where required and to minimize side slope intrusion onto adjacent land areas. Unsuitable soils would be removed from the project area and disposed of at a facility permitted to receive the materials.

6. **Land Use**: Snohomish County and the U.S Forest Service will determine fair market value for timber to be cleared for roadway construction within a new
roadway right-of-way easement. The U.S. Forest Service (USFS) will be compensated for loss of timber located within the roadway easement. No private property is proposed for acquisition. The project proposes no acquisition of private property.

7. **Land Use**: The project as proposed would be consistent with Riparian Reserves standards and guidelines that apply to the Index-Galena Road project. The project team has coordinated with USFS, the Washington State Department of Transportation, the Federal Highway Administration and other agencies to ensure that road design and operation and maintenance will promote attainment of Aquatic Conservation Strategy objectives. The project proposes to use the AASHTO Low Volume Roadway Design Standards to minimize the project footprint. The project completed a channel migration zone analysis as part of the project’s early feasibility analysis. Roadway design efforts have been closely integrated and coordinated with extensive geotechnical analysis to determine the best location for the relocated roadway. The project’s design criteria, project elements, and standards have been closely coordinated with USFS oversight to ensure consistency with the MBSNF Plan. Snohomish County would continue to coordinate with the USFS to ensure that long term road operation, maintenance and management are consistent with USFS standards and guidelines as established in roadway right-of-way easement requirements.

8. **Land Use**: The project would be constructed subject to permit conditions associated with Snohomish County development review. Applicable development regulations and regulatory review include **SCC 30.44 Shoreline Permits; SCC 30.67 Shoreline Management Program; SCC 30.62 Wetlands and Fish & Wildlife Habitat Conservation Areas; SCC 30.62B Geologically Hazardous Areas; SCC 30.65 Special Flood Areas**. Final mitigation requirements will be identified during these regulatory review processes and integrated into the construction plans and specifications as required.

9. **Visual Quality**: Snohomish County will minimize clearing to the extent practicable and implement design measures to address visual quality impacts.

10. **Visual Quality**: To implement these aesthetic considerations into the final project’s hard features, the project would construct retaining walls and other support structures with low-sheen and non-reflective surface materials to reduce potential for glare. Where determined appropriate, walls would have color (pigmented sealer with color pigment) and/or texture applied to the surface to blend with the surrounding environment. The finish would be matte and roughened, and the use of smooth trowelled surfaces and glossy paint avoided. Due to the project’s proximity to the North Fork Skykomish River, these design features would also be incorporated into the project to be consistent with USFS standards for development located in proximity to a recommended Wild and Scenic River. The use of form liners that mimic natural stone surfaces would also be considered. Guardrails would be installed that mimic a weathered steel (rust
colored) appearance. The project would also incorporate aesthetic treatment (materials, pattern, texture, concrete stain color) on any retaining walls, and the bridge proposed at Station 54+00, and other hard feature constructed elements.

11. **Recreation:** Existing river access for river recreationists near Milepost 6.9 will be retained. The project will coordinate with the USFS- Mt. Baker Snoqualmie National Forest on the final design.

12. **Plants:** Native forest duff soils from the project would be salvaged and re-used in areas identified for riparian restoration where the existing damaged roadway would be removed and would also be placed in areas temporarily disturbed by site clearing and grading. Reused duff soils would provide organic materials that promote plant survivability and would also provide a potential seed bank for native plant re-establishment once onsite final grades have been established. Road construction ground disturbance could potentially promote the spread of invasive non-native species. Application of any herbicides to treat invasive plants will be performed or directly supervised by a State or Federally licensed applicator consistent with the MBSNF Plan, and applicable amendments that include the 2005 *Invasive Plants Standards and Guidelines (S&Gs) the Pacific Northwest Region Record of Decision for Preventing and Managing Invasive Plants* and subsequent amendments.

13. **Air Quality:** Mitigation measures would be used to reduce potential impacts from vehicle exhaust and fugitive dust during construction of the project. Measures include BMPs suggested by the Puget Sound Clean Air Agency and the Associated General Contractors of Washington (*AGC Guide to Handling Fugitive Dust From Construction Projects*). These would include using only equipment and trucks that are maintained in optimal operational condition; developing a dust control plan during project planning to identify sources and activities that would be likely to generate fugitive dust and the means to control such emissions; removing particulate matter deposited on Index-Galena Road to reduce mud and dust; sweeping and washing streets continuously to reduce emissions; spraying exposed soil with water to reduce emissions of particulate matter and deposition of particulate matter; include dust controls on paved and unpaved roads and in site preparation, grading and loading areas. Additional measures would include covering all trucks transporting materials, wetting materials in trucks, or providing adequate freeboard (space from the top of the material to the top of the truck bed), to reduce particulate matter emissions and deposition during transport. The project would use quarry spalls (rock entrances), vehicle scrapes, or wheel washers to remove particulate matter that would otherwise be carried off-site by vehicles to decrease deposition of particulate matter on area roadways. The project would locate construction staging zones where diesel emissions will not be noticeable to the public.

14. **Cultural Resources:** The project in coordination with WSDOT and the U.S. Forest Service would develop an Inadvertent/Unanticipated Discovery Plan
Finding Of No Significant Impact
Index-Galena Road Milepost 6.4-6.9

15. Streams: Portions of the project’s proposed mitigation include restoring existing pavement areas to riparian forested conditions. This includes removing asphalt and other roadway features such as culverts, concrete barriers, guardrail, etc. Removing some of these features requires extensive in-water work and/or water crossings to gain access. The exact construction process will not be fully known until the project bidding process is completed and a contractor selected. However, the contract will include provisions to ensure that the water quality of the river is not adversely affected during the removal of these roadway features. These provisions would include the containment of potential pollutants, seasonal and fish-window timing conditions, restrictions of what activity would occur at high water levels, and, if necessary, fish isolation practices. Potential staging areas would be identified prior to the start of construction, and would be limited to those areas deemed to provide the most access with the least impact. Grading would be limited to the dry season (typically April to October) to avoid and minimize erosion that could cause excessive sedimentation. Erosion control best management practices (BMPs) would be used to prevent sediment from washing away from graded bare areas to streams. Limits of disturbance would be clearly marked by orange barrier fencing or other types of fencing to avoid unnecessary disturbance and minimize soil disturbance in proximity to streams.

16. Fish: Several conservation measures have been developed to avoid and minimize impacts and would include removing the road from the river; the project would not inhibit passage of any adult or juvenile salmonid species during or after construction; clearing limits would be identified by barrier fencing to prevent additional impacts to environmentally sensitive areas in proximity to streams and wetlands. In-water work would be conducted during the prescribed work window conditioned in the issued HPA. This is anticipated to be during the “Times When Spawning or Incubating Salmonids are Least Likely to Be Within Washington Fresh Waters” which is August 1-August 31. If fish exclusion is necessary during construction, all reasonable and prudent measures would be taken to ensure fish are excluded in compliance with the WSDOT Fish Exclusion Protocols and Standards (2012). All equipment entering the water would use vegetable oil or other biodegradable hydraulic fluid substitute. Large Woody Debris (LWD) would be installed to provide in-stream habitat for listed fish and buried rock toe protection would be faced with LWD to “soften” the interaction of the rock protection with the river if the river migrates into the embankment. Bridge piers and abutments would be built landward of the OHWM to avoid impacts to the stream.

17. Wildlife: The riparian area along the North Fork Skykomish River would be restored by removing the existing damaged road out of the river and adjacent buffer areas and planting the area with native trees and shrubs in as large of an
area as feasible. Forest duff salvaged during project construction would be placed back into cleared areas proposed for planting and areas temporarily impacted by construction. The project includes salvaging logs, trees, boulders, and stumps and placing them in the riparian zone adjacent to the river and in temporarily impacted areas, where appropriate. Habitat structures such as standing tree snags, boulder piles, and rock and brush piles would be placed in areas temporarily impacted by road construction and on sections of the existing damaged road once it is removed. In order to minimize impacts from noise to marbled murrelets flying along the river corridor, work would begin 2 hours after sunrise and stop 2 hours before sunset between April 1 and September 23.

18. **Environmental Justice**: Translators would be made available for both written and oral communication if the need arises as part of the public involvement process. Snohomish County will adhere to and implement provisions of its Title VI Plan, updated March 2015, in all of its project-related public involvement outreach.

19. **Hazardous Materials**: The project would use standard construction BMPs to avoid and minimize effects associated with hazardous materials and comply with all applicable environmental procedures, rules, and regulations. These BMPs would include implementing a Spill Control and Containment Plan to minimize spills, and ensure that all harmful materials are properly stored and contained.

20. **Wildlife/Construction Site Maintenance**: The project would remove waste which attracts Steller’s jay and Western Scrub-Jay, American Crow and Common Raven. These predators are known to feed upon Marbled Murrelet and Northern Spotted Owl eggs and fledglings. These provisions would be added to the project’s contract specifications.

23. **Groundwater**: Temporary measures would be used, and permanent measures as necessary, for subsurface drainage where groundwater could contribute to the potential instability of onsite soils.
Appendix 3  Public Hearing Transcript

EA/Environmental Hearing

The EA Environmental Hearing for the Index-Galena Road Milepost 6.4-6.9 project, was held on October 12, 2016. The site was the Frank Wagner Elementary Scholl, 115 Dickinson Road, Monroe, Washington. The Hearing began at 5:30 PM. Thirteen persons attending the meeting provided hearing comments to the Court Reporter. A copy of the hearing transcript is provided in this appendix. Responses to these and other comments are provided in Appendix 4.
SNOHOMISH COUNTY PUBLIC WORKS

PUBLIC HEARING COMMENTS

REGARDING THE INDEX-GALENA ROAD PROJECT

5:30PM - 8:00PM
October 12, 2016
Frank Wagner Elementary
Monroe, Washington

Reported by Kristen M. Uhlig
Certified Court Reporter, CCR, CSR
Washington CCR #1934
PUBLIC HEARING STATEMENTS

Yong Kim Statement

YONG KIM: My name is Yong Kim, Y-O-N-G, first name. Last name is K-I-M. I'm a store owner in Index, which is the only store that deals with the public all year around. Since the Milepost 6.3 through 6.9, I understand has been flooded, so many people has to make extra miles to make their destiny like Lake Blanca, and they are complain. And they keep coming back too next year to see whether the road has been fixed or not, and they find out it didn't fix, and so many people even cursing. (Sic).

That has been 12 years ago. Yeah. So I can see that a lot of public, including myself, our anxiety has really gone up, thinking that the weather -- that the road is going to start repairing.

And so I'm just trying to tell you that that road needs to be fixed sooner or later. The sooner the better. But that I understand that they schedule out. Their intent to start repairing in 2018 and it's going to take about approximately three years to be done. So as far as we know that they begin to start repairing the road, our anxiety level is going to a little go down. That make sense?
Since the area designated as the wilderness, Wild Sky Wilderness, the people who live in the Puget Sound try to take advantage to reach the area. But since the main entrance, which is the Index-Galena Road, has been flooded since 2006, they have to make extra 30 to 40 miles to get -- to reach their destiny and it's agony. It includes a lot of agony to everybody as far as I deal with the public. I mean, everybody got agony. Make sense? Frustrated.

And it since the -- since I deal with the public, run the small business in that area, I -- oh, I don't think that is necessary for this, so yeah. That's about it.

Bruce Albert Statement

BRUCE ALBERT: My name is Bruce Albert. I've been a resident of Index, Washington for the past 40 years and the mayor for the past 12.

I'm here tonight to say that both I and my community are in full support of the repair of the Index-Galena Road and its design. We have been, we think, very patient. It's been a very long time and we look very much forward to it being completed.
Kem Hunter Statement

KEM HUNTER: My name is Kem Hunter. I'm a Council member of Index and former mayor and a long time resident of 40 years in Index. And when I was mayor in 2006 when the flood washed away the river -- actually, I had just finished my term as mayor, but I was mayor until shortly before that.

We had fought really hard for the Wild Sky Wilderness area and was so disappointed when the road washed out because that was going to be the gateway to the Wild Sky Wilderness area. That was going to be the way that Index could revitalize its economy and tourism and also provide a great recreation for our community and probably a million visitors there, so it was very disappointing.

We are really excited the road is going to open again. It will be great for our economy. It will be great for all outdoor recreation enthusiasts, local, and those who come from afar, because this road is unique in that it goes through a low elevation wilderness area. So it will be a four season access, unlike most of our wilderness area when it's snowed in, that is not. So the sooner the better for opening the Index-Galena Road.
Mary Ritzman Statement

MARY RITZMAN: My name is Mary Ritzman and I have a home at 700 Avenue A, Index, Washington 98256. So my interests are in the repair of the Index-Galena Road between Milepost 6.4 and 6.9.

I have a deep concern that immediate attention needs to be given to the repair of this road. The exhibits that I have seen this evening are encouraging, but we have been promised repairs in the past. I encourage you to keep the timeline that you have presented in this open house this evening.

The Sky Valley relies on outdoor recreation to fuel our economic engine and the Index-Galena Road access to campsites and outdoor activities is very important to businesses ranging from outfitters to general stores.

As a final comment, the negative impact of the extended closure on my friends and neighbors in the area and the homeowners and business owners has been rather extreme. And I encourage the continued work on this project. Thank you.
Jim and Sharon Goff Statement

SHARON GOFF: We own property at SkyKo 3.

JIM GOFF: Please check the three washouts at Garland, San Juan and Bear Creek. Something needs to be done now or most likely we will not be able to get to our cabin for years to come. Age is against us too.

SHARON GOFF: Yes.

JIM GOFF: We need access to our cabin. Because of our age, we're unable to hike in.

SHARON GOFF: And hike out.

JIM GOFF: And hike -- or hike out.

SHARON GOFF: Yeah. Okay. There. We can just get it done. It would be nice.

JIM GOFF: Yes. Just some way we can get to our cabin.

SHARON GOFF: We've had it for 25 years, so we don't want to lose it now.

JIM GOFF: Yeah. I mean, age is against us and we're going to be losing out time eventually, but if we had road access, then we can ease it a little longer.

SHARON GOFF: Thanksgiving and Christmas. Even in the snow, we can get there with a new road.

JIM GOFF: Yes. Thank you.

SHARON GOFF: Okay.
Leigh Christianson Statement

LEIGH CHRISTIANSON: My name is Leigh Christianson. I am a Fire Commissioner for Snohomish County Fire Protection District 28 located in Index, Washington. It is our department that provides coverage for the area in question for the property owners there, so I am extremely interested in getting this project completed.

Right now, our volunteers respond to that area in one of two ways. One way is to go east on Highway 2 to Skykomish and go over Beckler, B-E-C-K-L-E-R, Beckler River Road over Jack's Pass and then down to the Index-Galena Road, which is highly used by recreation enthusiasts.

Any type of a call there would take our volunteers away from the district and their ability to respond to other calls for up to three hours. The alternate way to get to this washed out area is through a very tangled trail of which we have had to purchase special equipment valued at over $20,000 in order to access this area.

Another reason that I would like this to move forward is as a 30 year resident of the Index area, this whole recreation area has been unavailable to us. What we used to be able to take a quick drive up to, let's say, Jack's Pass or Trout Creek or Howard Creek Bridge, we can't do that any more. And our children have lost that experience of being in the woods so
1 close to home.
2 I know money is always a problem, there's never enough,
3 but after so many years, this project needs to take priority.
4
5 Lynne Kelly Statement
6
7 LYNNE KELLY: My name is Lynne Kelly and I live about
8 a quarter of a mile below Sunset Falls on the South Fork and
9 have lived there full-time for the past 32 years, and so the
10 area is very familiar to me and well known.
11 I have very much missed the access to that particular
12 stretch north of the project area because it has year around
13 access and it is accessible to many disabled people. So no
14 matter who comes to visit me, no matter what time of year,
15 there's always a stunning place to take them even if they're
16 low energy or not really super pumped up for a big hike.
17 Troublesome Creek and San Juan are just spectacular and I miss
18 it so much.
19
20 William Lider Statement
21
22 WILLIAM LIDER: First off, this project diverts County
23 staff and resources from more pressing work even with a -- even
with an uncertain 2018 start date pending future acquisition of funds. No. 2, the road will likely wash out again in the same or different locations.

Snohomish County Public Works cannot use the highway runoff manual. It must use the 2016 storm water manual per its NPDES permit. To use ER funds, emergency relief funds, the project must be under construction within two years after the end of the fiscal year when the disaster occurred. It is now 10 years after that and construction is still not scheduled for at least two years to start, if then. This project is no longer an emergency and emergency relief money cannot be used.

The agencies have not provided a rationale for time extensions for the ER money. Sno Co has not made the project a priority over its other nonemergency projects, which is a requirement of the law. Much of the work is considered a betterment, such things as retaining walls and bridges must be justified by a benefit cost economic analysis, if ER funds were to be used for those betterments.

There is no water quality treatment provided per Snohomish County Code or the County's 2016 drainage manual. Use of media filter drains are feasible and can be installed, but have not been shown on the drawings.

Sno Co still proposes to use dispersion offsite for water quality treatment. This is considered double-dipping.

Water quality treatment -- water quality treatment trade for
dispersion areas is not workable or allowed. The County cannot claim an area for dispersion that is currently receiving runoff from the highway. And if dispersion is used, it must be used on slopes no greater than 15 percent, extending for 100 feet of undisturbed native vegetation, which does not exist in the project area.

The County must provide flow control per the County's NPDES permit and no flow control has been shown on the design. Twenty-five foot high retaining walls have been added, but have not been adequately discussed in the EA from the aesthetics. And the site impacts, visual impacts, of these walls have not been addressed.

The walls will be fast in place concrete with a major concrete right next to a sensitive river with threatened fish species. The North Fork of the Skykomish is a wild and scenic river and, again, these visual impacts have not been addressed. The retaining walls will have grilled tie back rock anchors into the walls -- into the rock and there is a risk of blow outs from by confined aquifer and causing a major washout on the road and harming the river and the threatened species.

The rock ends will likely require drilling mud to hold the hole open and the use of drilling mud in that area will create a huge muddy mess right next to the river.

I have asked for information on the funding breakdown and I have not received that yet. I was also misquoted on the
FLAP, F-L-A-P, application as supporting the project when I did not. They took my quote out of context and used that to justify their report, which is devious at best.

I have asked to know who is processing the FLAP application so I can speak to them directly about this misrepresentation of the County using my name and their application as a supporter of the project.

I questioned why the asphalt from the original road that washed out has not been removed yet when it is totally independent of this project. That will do it.

I am a frequent user of the Mount Baker Snoqualime National Forest and I am a taxpayer and a concerned citizen.

Mark Hendrickson Statement

MARK HENDRICKSON: My name is Mark Hendrickson. I have property in SkyKo 4 -- 3. I'm on the river. I have concerns about Garland Hot Springs washout, the San Juan campground washout and Bear Creek. I am really worried about Bear Creek because it's going to take the road out completely and then I won't have access to my property.

It's really bad. And this weather that's coming up this weekend, I'm afraid that the Garland Hot Springs wall of rock will come down. And so then again, we'll be blocked out. But
it's getting to the time of year where we're not going to go up
anymore because of the danger of the snow.

    I would really like to see those things fixed. And I
know it's going to be difficult for you people, but it would
make me happy.

    The other thing is the maintenance of the Forest Road
65. I just spent $2,000 to have a new front end put onto my
truck. And, you know, some places, you can do the 30 mile an
hour speed limit. In other places, you're going to be lucky if
you can get up to 20 miles because of the washboard and the
chuck holes and the bad bad maintenance of the road.

    There really needs to be -- this really needs to be
addressed. I had more to say.

    I would really -- I would really like to have the
washout fixed. Our carbon print has tripled because of the
added mileage going up and over Jack's Pass. My trip went from
46 miles to now over 75 and so you can see there's a rather
large carbon print.

    MICK MEISSNER: That's okay. Don't stop talking.

    MARK HENDRICKSON: I think that about does it. Well,
actually, no. It doesn't.

    There's 10 agencies involved in this thing.

    MICK MEISSNER: I have all of them written for you.

    MARK HENDRICKSON: Oh yeah. All of the agencies, you
know. I have never seen so much wasted time and paper and
salaries and more carbon print from the people driving up there and looking around. It's 10 agencies and they can't even get a road put in. Everybody is frustrated with these 10 agencies.

MICK MEISSNER: Can you type both of us?
MARK HENDRICKSON: All right. I've said my piece. I am done.

Mick Meissner Statement

MICK MEISSNER: That's what I am going to say too. The Army Corps Engineers, the National Oceanographic and Atmospheric Administration, the Washington Department of Natural Resources, Washington State Department of Ecology, Fish and Wildlife, Transportation, Snohomish County, Federal Highway Administration, the USFS Forest Service and Fish and Wildlife Services, that's 10 agencies. So 10 agencies can't build a mile of road in 10 years. That's what we know as cabin owners. It's 10 years and 10 agencies cannot produce a mile of road.

It's so frustrating that we're all ready to scream. All of these meetings add up to, we're still not going to get a road. And then if it washes out higher up over Jack's Pass, even the stuff that we're talking about here tonight can't be done until they fix that road.

All of this time we have spent double the amount of time
driving over Jack's Pass. The very mantra of some of these agencies, the love of the forest, you would think that they would care that we're doubling our carbon footprint driving up and over the pass.

Some of us see our properties 52 times in a year and some of us 30 times if it snows. Some of us hike in just because we love it so much. Some of us have spent over $100,000 to be there in cabins and land.

We still can't get there after 10 years and 10 agencies. They bring all of their best heads together in a room and still produce no road.

It's irritating. It's frustrating. It's maddening, and it seems like it's just a big fat joke on us that there's really never going to be a road.

I would actually be shocked if they put one in. At this point, 10 agencies can't get their naval gazing acts together and produce a road. That's basically what I've got to say.

Mary C. Clark-Waltz Statement

MARY CLARK-WALTZ: I've been a property owner near Index for over 40 years. I've seen many changes on this road in the 40 years and nothing has been this big a project, but there have been significant projects that have taken far less
time.

This is -- my concern is that there is limited access to getting up to our place because of the winter snow conditions and various trees falling over the road and whatever. And when we are there, there's a significant risk because there's only one way out.

We don't have a main road to go out anymore and haven't for 10 years. And so if something should happen while we're there, we are stuck with no communication, no fire, no rescue, no nothing. And the fact that this road has taken so long impacts our -- my -- it impacts my comfort level of even going through that.

I think that the plan --

BRIAN CLACK: Did you look at the plan?

MARY CLACK-WALTZ: I did look at the plan and it seems like an awful lot of departments that have to come to the same conclusion, but I agree with their moving forward.

BRIAN CLACK: And you agree with the fundamentals of the --

MARY CLACK-WALTZ: And I'm glad we have the funding. I'm very happy to hear that we have the funding. And that what is holding it up is just this environmental studies and cooperation to make sure that they're going through the right criteria to get it approved.
Brian Clack Statement

BRIAN CLACK: I just want to say that we've been waiting way too long for this road to be fixed. And I have looked at the environmental study report and I agree with it. Let's get this road built. That's it.

(Comments Concluded)
CERTIFICATE

STATE OF WASHINGTON )
COUNTY OF ISLAND ) ss.

I, Kristen M. Uhlig, Certified Court Reporter and for the State of Washington, Residing at Clinton, Washington, in said County and State do hereby certify:

That the foregoing is a full, true and correct transcript of the hearing taken in the above-entitled cause;

IN WITNESS THEREOF, I have hereunto set my hand and affixed my official seal this ___ day of____________, 2016.

Kristen M. Uhlig, #1934
Certified Court Reporter,
Residing in Clinton, Washington.
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Appendix 4   Copies of Comments Received

Summary

In addition to the oral comments provided to the Court Reporter provided in Appendix 5, a total of 22 written comments were received during the Index-Galena Road Milepost 6.4-6.9 NEPA Environmental Assessment comment period. In addition, 465 e-mails were received.

Comments were submitted in three ways:

- Eleven filled-out comment forms provided at the Environmental Hearing public meeting held on October 12, 2016
- 465 comments sent via e-mail
- 11 letters sent via U.S. Mail

The written comments and responses to comments are provided in the comment response matrix provided in this appendix. Due to the high volume of e-mail comments, they are contained on the disk provided with this FONSI. A reference system numbering the comments and responses to the comments is provided in the matrix and is shown below:

E - e-mail comment
CFM - comment form handed in at 10-12-16 meeting
L – Letter
CFE - comment form submitted via e-mail
October 26, 2016

Crilly Ritz, Senior Environmental Planner
Snohomish County Public Works
3000 Rockefeller Avenue M/S 607
Everett, WA 98201
crilly.ritz@snoco.org

Subject: Index-Galena Road MP 6.4-6.9
Environmental Assessment Comments

Introduction:

It is now 10-years since the 2006 storm washed out the Index-Galena Road at Mile Post 6.4 to 6.9. Snohomish County Public Works has spent approximately $4,900,000 on preliminary engineering and it is no closer to commencing construction than it was in 2012. Indeed, Snohomish County is unsure if it will even be able to commence construction in 2018, pending acquisition of additional funding. There is a significant possibility that the Index-Galena Road will suffer significant damage in upcoming winter storms.

The Index-Galena Road is not even on a right-of-way deeded to the County, yet the County is still moving forward to reconstruct this washout prone, unsustainable road that it lacks funding to provide even the barest annual maintenance. Diverting Public Works staff to work on a non-essential project such as Index-Galena Road with an at best traffic level of 227 ADT, diverts County resources that would be better spent on more critical projects in the populated portions of the County. And the County lacks staffing in its Sherriff’s Department to patrol the road.

This project clearly is no longer an “emergency” that qualifies it to receive Federal Highway Administration (FHWA) Emergency Relief (ER) funding, ten years after the disaster. The County has not made the repair of the Index-Galena Road a priority over its other non-emergency work projects which also disqualify it from receiving ER funding. Nor has the County provided satisfactory justification for a 12-year project delay to warrant its retention in the ER program. Projects for which permanent repairs have not advanced to construction by the end of the second FY following the year in which the disaster occurred cannot be authorized. The County is required to provide justification for the dozen-year plus delay in construction and must request annual time extensions; these extensions must be submitted to the FHWA Division Administrator for annual approval. Time extensions may be granted only in one-year increments and only with sufficient justification. Unjustified delays are cause for mandatory disqualification of a project from the ER program.

The County now seeks Federal Lands Access Program (FLAP) funding from FHWA to augment the requested ER funding; yet it has misrepresented my comments and others as supporting

Page 1 of 8
this project, when clearly that is not the case. This blatant misrepresentation should disqualify the County's application for FLAP funding.

And finally the Environmental Assessment (EA) is flawed and must be revised before any Finding of No Significant Impact (FONSI) or other threshold determination may be issued.

Many of the comments that I have made on this project and attached to this comment letter have not been addressed by either the County of FHWA and must therefore be repeated once again in these comments.

In short I do not support or recommend that this project go forward. My specific comments for this recommendation are as follows:

Environmental Assessment Comments

1. Use of the WSDOT HRM not allowed: The EA states on page 54, that:

   "Stormwater runoff will be managed in accordance with the Washington State Department of Transportation's Highway Runoff Manual (HRM). The primary users of the HRM include "Counties, municipalities, and other jurisdictions that design transportation projects supported by federal or state funding" that have been identified, funded and are constructed for public use and necessity and public safety, within the public right of way."

   Snohomish County and the Public Works Department must comply with the requirements of its 2016 Drainage Manual and not the WSDOT HRM. The County’s NPDES permit stipulates that a Phase 1 municipality may only adopt one stormwater manual.

   In a May 13, 2013 letter to Councilman Gossett, by Bruce Duvall, Director, Engineering Services, (See Attachment 1) states:

   "Engineering Services is in the process of preparing a modification of Snohomish County Code 30.63A.110 to use the WSDOT manual."

   This was never done and there currently is no modification to SCC30.63A.110 that allows the County to substitute the HRM in its entirety for its 2016 Drainage Manual. While SCC30.63A.830 allows project specific modifications, it does not permit carte blanch replacement of the County’s drainage manual with another stormwater manual.

   The County’s failure to use its 2016 Drainage Manual could result in up to a $10,000 per day fine from the Department of Ecology. In a June 6, 2013 letter to Steve Thompsen, Director SNOCO Public works, Rachel McCrea, Municipal Stormwater Specialist (See Attachment 2) warned Public Works that failure to follow the provisions

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1 Reference S5.C.5.b.ii, Western Washington Phase I Municipal Stormwater Permit, Effective September 1, 2012
in the documents upon which Ecology's determination was made to approve its stormwater manual will constitute a violation of its Phase I NPDES Permit, including issuing orders and/or civil penalties of up to $10,000 per day per violation.

If Snohomish County is unable or unwilling to use its 2016 Drainage Manual, then it should not repair the road and return maintenance responsibility to the US Forest Service.

Comment 1: The County must use its 2016 Drainage Manual as the primary design document authority or it may not proceed with project construction.

2. The Index-Galena Road No Longer Qualifies for ER funding: Procedures relating to the ER program for roads are stipulated in Title 23, United States Code, Section 125, a special program from the Highway Trust Fund established by Congress for the repair or reconstruction of Federal-aid highways and roads on Federal lands which have suffered serious damage. The ER Manual states in part:

"Unless there is satisfactory justification for project delay to warrant its retention, projects for permanent repairs that have not advanced to construction obligation by the end of the second FY following the year in which the disaster occurred cannot be authorized. Justification for such delay and request for time extension must be submitted to the FHWA Division Administrator for approval. Time extensions are granted in one-year increments. Such delays may be caused by the need for extensive environmental evaluation, litigation, or complex right-of-way acquisition."

In 2012, the County indicated that the Index-Galena Road would be re-opened by 2015, now it hedges that the road will not re-open until 2018, if even then. This 12-year plus delay has not been caused due to extensive environmental evaluation, litigation, or complex right-of-way acquisition; rather this delay has been caused because the County has been unable to secure outside funding for a non-essential, unsustainable, and washout prone road; and because the County is unwilling to fund this project using money out of the County Public Works' budget.

The County had not provided requested documentation that it has submitted the required annual time extensions for every year since FHWA approval, required to maintain its status for ER funding, or the justification that a time extension is indeed warranted.

The County has not made the Index-Galena Road a priority over its other non-emergency projects which again disqualify it from using ER funds.

The project is currently contingent on Federal Lands Access Program (FLAP) funding to help make up the deficit between the $15,000,000 ER funding request and the estimated $26,700,000 construction cost. There is currently no guarantee that the FHWA will even fund this project or that Congress will appropriate additional FLAP funds.

2 Reference ER Manual Page 64, Chapter VI, Section I
Comment 2: Under federal statute Title 23, United States Code, Section 125, this project no longer qualifies for ER funding. To proceed forward with ER funding will invite litigation.

3. Misrepresentation of Project Support on FLAP Application to Obtain Funding under a False Pretext: In the 2016 Washington Federal Lands Access Program Application, signed by Terry Ryan on February 17, 2016, page 6 of 12 (See Attachment 3), states,

"William M. Lider, PE, CESCL has been vocal at meetings and in letters regarding certain aspects of this project. It is our understanding that he does not oppose re-opening the Index-Galena Road."

This was an intentional misrepresentation of my comments with the intent to show support where it currently does not exist and unlawfully obtain federal funding under a false pretext. My quote was taken out of context to intentionally misrepresent my position. Per my Scoping Comment letter date February 11, 2012, last paragraph, Page 3 of 4 (See Attachment 4) The entire statement should read,

"While I do not oppose re-opening the Index-Galena Road, I am opposed to the current road design configuration and currently proposed inadequate environmental mitigation. If the project cannot be constructed without significant adverse impact or if it must rely on ER funding, then the project should be terminated and this section of the road decommissioned." EMPAHSIS ADDED

Because of the continuing inadequate environmental mitigation and the blatant misuse of ER funds on a project that the County clearly does not consider an emergency, I most strongly oppose this project.

Comment 3: Retract the FLAP application and revise to correctly intimate William Lider and others opposition to this project.

4. The EA fails to adequately address required stormwater quality treatment. The EA is ambiguous and conflicts with the Surface Water Discipline Report. Natural dispersion requires 100-feet (measured horizontally), undisturbed native vegetation at a slope no greater than 15%. Any area used for stormwater dispersion must also be deeded or have a drainage easement stipulating that this area will be preserved for stormwater treatment in perpetuity. Unfortunately, almost none of the side slopes in the Mile Post 6.4-6.9 project area meets these conditions. Furthermore, treatment trades outside of each Threshold Discharge Area (TDA) are not permitted and do not meet the requirements for natural dispersion to treat polluted stormwater runoff when they are already treating polluted road runoff from non-project areas.

The EA goes on to state on page 54:

"The Highway Runoff Manual presents a method to assist in determining when site-specific factors could make constructing stormwater management facilities within or adjacent to the highway right of way infeasible. This method is called the Engineering and Economic Feasibility (EEF) Evaluation."

There are several problems with the foregoing statement.
dated February 26, 2013; the 2013 drawings showed a laid back slope into the mountain side. Apparently the 25-foot tall walls were added as a design afterthought due to the instability of the up-slope excavation. Impacts from these walls are significant.

First, the design calls for between 45 and 90 drilled tie back anchors, 6-inches in diameter drilled 20-feet or more into the mountain. Drilling tie-backs requires caustic drilling mud to hold the holes open as well as massive amounts of water to lubricate drilling heads. Each tie-back hole will then be filled by pumping in concrete grout to displace the drilling mud and anchor the tie back that will flow back out spilling onto the narrow roadway.

The CIP retaining walls also require the installation of 45 drilled steel H-Piles (soldier piles), drilled approximately 20-feet deep and 4-feet in diameter. After setting the soldier piles, the drilled holes will be filled with concrete.

All of this drilling, mud pumping, and removal of drill cuttings must be accomplished on a roadway no wider than 20 feet. In addition, there are 16 culvert/stream crossings on the project in addition to one bridge. Each one of these crossings is a conduit to convey drilling mud, sediment, and other pollutants directly into North Fork Skykomish River with its population of threatened Chinook salmon. Simply installing silt fences is wholly inadequate. Typically, contractors will side cast excavated materials and allow this toxic sediment to runoff into the adjacent waterway. This was the case on the Mountain Loop Highway in 2006 at Mile Post 33.6 in a similar construction situation (See Attachment 5).

Because of massive amounts of excavation, drilling mud, and CIP concrete work in the immediate vicinity of a river, all construction work on the roadway that involves, excavation, drilling, or CIP concrete work should only be allowed during "open fish windows" when no threatened species are present in the river. Otherwise exactly the same situation will occur here as at the Mountain Loop Highway in 2006.

In addition to all of the foregoing, there is a very real possibility that one of the drilled tie back anchors could puncture a confined aquifer; that is an aquifer where the groundwater is under pressure. This could result in a "blowout" releasing thousands of gallons of water, mud, and debris directly into the river. With 16 culvert/stream crossings in the one-half mile of roadway, it is evident that the upslope area of the MP 6.4 to 6.5 is highly saturated with a good potential for a confined, pressurized aquifer.

Such was the case on the WSDOT Issaquah Highlands Road at the Interstate 90 interchange in 2002. Massive amounts of mud were generated as the result of tie-backs puncturing a confined aquifer. This required construction of a large sediment ponds and a chitosan filtration plant to treat the muddy water before release back into the Issaquah River. The blow-out risk is huge at Mile Post 6.4-6.9 and should be avoided by re-designing the retaining walls to be free standing, cantilever walls, with no tie-backs.

Lastly the aesthetics of the three retaining walls were never addressed in the EA. The three proposed massive, 25-foot high CIP retaining walls with snap tie holes will be ugly. They will despoil the beauty of the Wild and Scenic North Fork Skykomish River. There is no mitigation proposed for this unsightly visual impact.
First, as previously stated in comment 1 above and as confirmed by Ecology, Snohomish County cannot use the HRM carte blanche for this project. The Snohomish County 2016 Drainage Manual does not permit not providing water quality using the Engineering and Economic Feasibility (EEF) Evaluation.

Second, no Engineering and Economic Feasibility (EEF) Evaluation was provided in the EA, so even if the HRM were allowed (which it isn’t), the EA is still incomplete because an EEF evaluation was never performed.

Third, in my comment letter dated April 16, 2013, that is included as a part of Attachment 1, I provided an analysis and design sketch showing that a Media Filter Drain could be provided that would provide enhanced water quality treatment required for this project. This was never discussed in the EA.

Media filter drains are an Ecology approved standard stormwater treatment that would be feasible to install for a fraction of the overall $26,700,000 estimated project cost. Bruce Duvall tried to argue in his May 13, 2013 response letter (See Attachment 1) that because only 227 ADT vehicles will use the road at this remote site, they do not need to comply with the water quality requirements of the drainage manual. This is simply incorrect. Snohomish County Planning and Development Services simply would not permit a private developer to use this argument to avoid providing water quality. Furthermore, as the lead civil design engineer for Parsons Brinkerhoff in 2008, I designed a similar Media Filter Drain on the Mountain Loop Highway at the Marton Creek Bridge replacement project as a part of a County Public Works project. Water quality treatment must be provided, especially with federally, listed threatened Chinook salmon immediately adjacent to the road.

Comment 4A: Stormwater Dispersion, if used, must be within the pre-developed threshold discharge areas, and on undisturbed native vegetation for a distance of 100-feet on slopes no steeper than 15%. Double-dipping (or treatment credit theft) of off-site dispersion areas currently treating stormwater is not permitted under the County’s NPDES permit and 2016 Drainage Manual.

Comment 4B: Require the roadway design to include a Media Filter Drain in the road prism shoulder to provide enhanced water quality treatment.

5. **Flow Control is required**: Just as water quality treatment is required under the County’s 2016 Drainage Manual, so is stormwater runoff flow control. This comment was also discussed in my comment letter dated April 16, 2013, included as a part of Attachment 1, that provided one design using Western Washington Hydraulic Model (WWHM) methods and included a design sketch showing a 42-inch diameter pipe for stormwater detention could be provided. Again the cost of providing this required stormwater flow control will be only a fraction of the overall $26,700,000 project cost.

Comment 5: Provide flow control as required under the County’s 2016 Drainage Manual.

6. **Impacts from three 25-foot high, cast-in-place concrete retaining walls have not been evaluated**. The EA failed to address or adequately discuss impacts of the three proposed 25-foot high cast-in-place (CIP) concrete retaining walls. The upslope retaining walls were never contemplated or discussed in the 60% submittal drawings
Comment 6A: Only allow drilling, concrete work, and excavation work during open fish windows on the North Fork Skykomish River to mitigate impact from unavoidable discharges of excavated materials and drilling mud.

Comment 6B: Redesign all retaining walls to be free standing, cantilever walls, with no tie-backs drilled into the mountain.

Comment 6C: Provide a detailed evaluation of the visual impacts from a CIP concrete retaining wall in the Wild and Scenic River corridor and propose suitable mitigation for public review and comment.

7. **EA Does Not Address Wildlife Corridor Benefits from not Re-opening the Road:**

Currently the Index-Galena road creates a wildlife barrier or deterrent for migration of wildlife such as Mountain Goats between the Wild Sky Wilderness to the south and the Henry M. Jackson Wilderness to the north. By permanently closing the road between occupied private properties east and west of the MP 6.4—6.9 repair, a more viable wildlife corridor is created to the benefit of all species.

**Comment 7:** As a part of the no action alternative, evaluate the benefits of creating an unimpeded wildlife corridor in the vicinity of the MP 6.4-6.9 repair.

8. **Asphalt Removal from Old Road Washout:** It is simply a travesty that Snohomish County has allowed petroleum laden asphalt concrete to remain in the river for over a decade, from the 2006 roadway washout. As the asphalt slowly degrades and weathers in the river, it degrades the water quality by releasing petroleum products. I am amazed that Ecology has allowed this situation to continue for 10-years.

Removal of the asphalt should not be tied to whether the Index-Galena Road is ever re-opened. All asphalt in the river should have been removed from the water by the County the summer after the disaster occurred.

**Comment 8:** Regardless of EA, FLAP, or any other external funding source, Snohomish County as the responsible party for the maintenance of the Index-Galena Road must be required to remove all in-water asphalt at the next low water condition.

**Conclusion:**

Snohomish County proposes to spend nearly $27,000,000 to repair one-half mile of roadway where the projected ADT traffic load is 227 vehicles per day. Currently Snohomish County as spent nearly $5,000,000 on preliminary engineering alone. Snohomish County is unwilling to spend its Public Works budget on this faux “emergency” project and has stated that even a 2018 construction start date will not occur, if full federal funding is not obtained.

County staff time and resources have been diverted from more pressing projects in the populated areas of the County, to this remote, un-sustainable, non-essential, low traffic road that will likely washout elsewhere before the MP 6.4-6.9 repair can even be completed. Access to the private properties in the old Galena town site is still available via Jack’s Pass. The
County is not obligated to provide a paved, all-season road to these properties that one can drive a Winnebago 45-mph on.

The argument that these property owners must have emergency vehicle access is also fallacious. If one chooses to live deep in the National Forest, then they must also assume that they will not receive a 5-minute emergency response as a similar resident in the populated areas of the County. Rather than spending excessive tax payer dollars on repairing a wash-out prone road, the County and the US Forest Service should offer to buy out properties from willing sellers. Those unwilling to sell would be required to accept a lesser access road in exchange for the solitude of living at the edge of two large wilderness areas.

The County, FHWA, and the USFS should cut their losses, terminate the project, and permanently decommission this section of the Index-Galena Road. Failing this, legal action may be required to halt the misuse of Emergency Relief funds as outlined in Attachment 6.

Thank you for your consideration of these comments.

Respectfully submitted,
LIDER ENGINEERING, PLLC

William M. Lider, PE, CESCL
Principal Engineer

Attachments: Attachment 1: 13May2013_Response to Mr. Lider
Attachment 2: Index Galena Ecology Letter to SNOCO June 6, 2013
Attachment 3: SNOCO FLAP Application—Lider comments
Attachment 4: Lider EA Scoping Comments February 11, 2012
Attachment 5: WDFW Jeff Kemp Letter April 23, 2007
Attachment 6: WELC Letter to SNOCO June 26, 2012

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October 31, 2016

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3000 Rockefeller Avenue M/S 607
Everett, WA 98201
crilly.ritz@snoco.org

Subject: Index-Galena Road MP 6.4-6.9
Environmental Assessment Comments
Appended October 31, 2016

I would like to append my comments submitted on October 26, 2016 with the attached photo and excerpt from the Index-Galena Road 60% design drawings showing the proposed tie back wall design.

The Attachment 1 photo shows a typical drilled tie-back operation for a retaining wall for a road construction project. The wall shown in the photo is approximately the same height and length for the three retaining walls proposed to be constructed as a part of this project. Note the high pH drilling mud and concrete grout throughout the work area from the tie back installation. At the point shown construction, the timber lagging and tie backs have been installed, but the final concrete forms must be constructed before the wet concrete is placed for the final wall construction.

Attachment 2 shows the 60% construction design drawings for the three 25-foot high retaining walls. Because there is no possibility of constructing a sediment pond or Chitosan filtration system in the narrow, 27-foot wide roadway, it can be anticipated that all the drilling mud, pumped out concrete grout, and excess concrete will wash directly into the South Fork Skykomish River. With 10 culvert crossings in a half mile stretch of road, it will be impossible to route the muddy water to a treatment facility. These impacts were never addressed in the EA.

Again aesthetic impacts from the three, 25-foot high retaining wall construction in a wild and scenic river corridor were not addressed in the EA.

Please issue a supplemental EA to address these impacts.

Thank you for your consideration of these additional comments.
Respectfully submitted,
LIDER ENGINEERING, PLLC

October 31, 2016

William M. Lider, PE, CESCL
Principal Engineer

Attachments: Attachment 1: Photo, Typical Tie Back Operation
Attachment 2: Index Galena Road 60% Drawings, Sheets WT01-WT07

cc: Dave Somers, Snohomish County Executive Dave.Somers@snoco.org
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Greg Stegman, Ecology GSTE461@ECY.WA.GOV
Attachment 1: Typical Tie Back Operation not drilling mud throughout the worksite.

Attachment 2: Index Galena Road 60% Drawings, Sheets WT01-WT07
GENERAL NOTES:

1. All materials and workmanship shall be in accordance with the requirements of the Washington State Department of Transportation Standard Specifications for Road, Bridge and Municipal Construction – English, 2014 and Amendments.

2. This structure has been designed in accordance with the requirements of the American Fiber-Bridge Design Specifications – 6th Edition – 2012 and Amendments.

3. W-Section steel soldier piles shall conform to ASTM A914. HP-Section steel soldier piles shall conform to ASTM A36. Soldier piles shall be painted to the limits shown in the plans in accordance with standard specifications, Section B-16.361.

4. Plates for the soldier pile assembly stiffener shall conform to ASTM A36. Gr. 50 steel concrete strands shall conform to the requirements of ASTM A416-08.

5. All welds shall be done to minimize distortion. The welding sequences and procedures to be used shall be submitted to the County for approval prior to the start of welding.

6. Unless otherwise shown in the plans, the concrete cover measured from the face of the concrete to the face of reinforcing steel shall be 10". All dimensions are horizontal and vertical unless otherwise noted.

7. Existing ground line is approximate and shall be verified by the Contractor on the job site.

8. Permanent ground anchor load = 64% of factored design load.

9. Refer to civil plans for wall plan view.

10. Refer to Soldier Pile Elevation Table.

SOLDIER PILE WALL SP-1 ELEVATION

SOLDIER PILE ELEVATION TABLE

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60 PERCENT SUBMITTAL

INDEX—GALENA ROAD RE-ALIGNMENT TIE-BACK SOLDIER PILE ELEVATION SP-1
SOLDIER PILE WALL SP-3 ELEVATION

NOTE:
1. SEE "GENERAL NOTES" ON SHEET WD-1
NOTES:
1. PRESSURE EARTH PRESSURE SHOWN FOR WALLS SHALL BE APPLIED OVER 2.0 TIMES THE PILE DIAMETER OR THE PILE SPACING, WHICHEVER IS LESS.
2. APPLY ACTIVE PRESSURE OVER THE WIDTH OF THE SOLID PILES BELOW THE BOTTOM OF EXCAVATION.
3. WALL EARTH PRESSURE SHOWN FOR WALLS SHALL BE CONSIDERED WITHOUT RESISTANCE. EARTH PRESSURE SHOULD BE DETERMINED BY SATURATING THE WALL WITH THE EARTH PRESSURE AROUND THE BOTTOM OF THE PILE.
4. PRESSURE EARTH PRESSURE SHOWN FOR WALLS SHOULD BE REEVALUATED FOR BACK/BALANCE OR GREATER THAN 40 DEGREES.
5. THE RECOMMENDED ALLOWABLE LOAD TRANSFER RATE FOR TIE-BACKS IS 10000 lb. THIS VALUE INCLUDES A FACTOR OF SAFETY OF 3.

DESIGN CRITERIA
1. DEAD LOAD: WEIGHT OR MATERIALS OF CONSTRUCTION
2. LIVE LOADS: PER DIAGRAM
3. SOIL LOADS: PER DIAGRAM

LOADING
h: HEIGHT OF EXCAVATION (FEET)
D: EARTH PRESSURE (FEET)
H: DEPTH TO ANCHOR WORKPOINT
m: DISTANCE FROM BOTTOM OF EXCAVATION TO LONGEST TIEBACK (FEET)

RECOMMENDED EARTH PRESSURE FOR SINGLE TIE-BACK WALLS SP-1 & SP-2 (PRESSURES IN PDS)

RECOMMENDED EARTH PRESSURE FOR CANTILEVER WALL SP-3 (PRESSURES IN PDS)

RECOMMENDED EARTH PRESSURE FOR SINGLE TIE-BACK WALL SP-3 (PRESSURES IN PDS)
Excess Concrete Grout Pumped into Tie Backs will wash into the South Fork Skykomish River.
October 18, 2016

To whom it may concern,

I am a 40 year resident of the Town of Index and have been Mayor of that community for the past twelve years. I have also been a frequent and regular recreational user of the North Fork Skykomish valley since around 1961.

I have reviewed the NEPA Environmental Assessment and associated reports for the Index Galena road repair as posted on the Snohomish County website.

As both elected official and longtime resident I stand fully in support of the road repair/reconstruction as proposed, and I believe the overwhelming majority of citizens in my community would agree. Restoration of the Index Galena road is vital both to the local community and to the population as a whole to restore its functions as a transportation corridor for access to private and recreational lands in the valley, as well as to enable commerce and serve public safety needs. I believe the project as designed, and its effects, pose no additional, undue, or objectionable environmental concerns.

Please note also my oral comments presented at the October 12 open house/hearing held in Monroe.

I am pleased to see progress being made on this project, and I look forward to its completion.

Sincerely,

[Signature]

Bruce Albert
Mayor
October 27, 2016

Crilly Ritz, Senior Planner
Snohomish County Department of Public Works
3000 Rockefeller Avenue
Everett, WA 98201
Email: Crilly.ritz@snoco.org

Re: Draft Environmental Assessment for the Restoration of the Index-Galena Road

Dear Mr. Ritz,

The Sky Valley Chamber of Commerce and the Visitor Information Center would like to submit this letter of support to continue with the project to restore the Index-Galena Road as soon as possible.

The Sky Valley economy is primarily based on tourism and especially, outdoor recreation. We have formed a group called the Sky Valley Recreation Planning Group. It is open to anyone who would like to attend but it’s main purpose is to bring all of the public land managers together every other month to report on their activities and plans. The Sky Valley has an unusually high percentage of public lands and their management directly impacts the health and wellbeing of the entire area. Representatives include: US Forest Service, State Parks, Dept. of Natural Resources, Fish & Wildlife, County Parks, elected officials from Congresswoman Del Bene, Senator Pearson, all of the cities and towns in the Sky Valley. It also includes special interest groups like Sierra Club, Forterra, Trout Unlimited, Shooting Sports, and many more. It is a diverse group but the core belief and common ground is that we all care about the land and opportunities here in the Sky Valley.

When the Sky Valley Wilderness area was created the one promise that was made to the local area is that it would always have road access through it. When the road washed out in 2006 we were told that it would reopen in 2015. It was discussed at almost every S.V. Recreation group meeting but still 2015 came and went. We appreciate the work that has gone into this plan and believe that it will be the best investment to completely remove the road from being threatened by the river again to the location that has been identified in the plan.
We also appreciate the fact that the economy of the Sky Valley and the impacts of outdoor recreation are being recognized and understood. If we are to preserve the legacy of the Wild Sky Wilderness area we need to allow people to have a relationship with it.

Respectfully submitted,

[Signature]

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360-793-0983

Dr. Brian Copple, President
Sultan Chiropractic Center

Frank Linth, Vice President
Retired Real Estate Agent

Laura Koenig, Treasurer
City of Sultan Clerk Treasurer

Davi Martin, Secretary
City of Gold Bar Councilmember

Nancy Breuer, Board member
Coastal Community Bank

Janet Prichard, Board member
Republic Services

Henry Sladek, Board member
Cascadia Inn, Owner

Blair or Bill Corson, Board member
Outdoor Adventures, Index
Washington State Chapter
180 Nickerson Street, Suite 202
Seattle, WA  98109
October 31, 2016

Crilly R. Ritz, Senior Planner
Snohomish County Public Works
3000 Rockefeller Ave, M/S 607
Everett, WA  98201

RE: Environmental Assessment Index-Galena Road, dated September 2016

Dear Ms. Ritz:

On behalf of the Sierra Club’s 25,000 members in Washington State, we would like to provide comments on the subject EA.

Many of our members use the Skykomish Ranger District on the Mt. Baker-Snoqualmie National Forest, including the valley of the North Fork Skykomish River where the project is to take place. Our members enjoy the area’s pristine roadless areas, designated wilderness, wild rivers and streams, opportunities to fish, as well as the extensive trail system accessed from public roads. The proposed action has the potential to affect these interests of our members and the public.

We very much appreciate that the County has scaled back the scope of the project as originally conceived to just a half-mile of reconstruction as well as limited the upslope relocation. This design will create far fewer impacts than the original concept of rebuilding the road over a much longer distance into undeveloped forests.

We fully support restoring public access on the Index-Galena Road. We agree with the EA comment (page 4) that “Index-Galena Road is a direct and vital transportation link to the upper
North Fork Skykomish River area, both for National Forest administrative and public recreational access.” The repair of the Index-Galena Road will restore access to low elevation multi-season recreational opportunities along the popular Skykomish River. The Index-Galena provides drive-in access to popular family destinations such as Troublesome Creek and San Juan Campgrounds, popular launch sites for world-class whitewater boating opportunities, and the many incredible hiking trails in the Wild Sky and Henry M. Jackson Wilderness Areas.

We had asked that the County consider a number of items in our letter to your office dated February 27, 2012 to further enhance and restore the floodplain, hydrologic function, and wildlife and fish habitat along the North Fork Skykomish River, and to protect its wild and scenic character. This letter will further comment on many of those items.

1. We had asked that the County remove all abandoned sections of pavement, gravel, and riprap rock, and all structural items such as jersey barriers, guide rails, and culverts. Please attempt to remove pieces of pavement that have been washed downstream. The EA Paragraph 2.9 (page 16) satisfactorily responds to this request.

2. We had asked that areas of the existing road alignment be re-graded as needed to restore original contours and hydrological gradients. Some of the areas impacted by the old alignment might now be in the Wild Sky Wilderness (See Sections 35 and 36 T28N-R10E). The EA paragraph 2.9 does not directly address this question. We request that the EA be revised to provide direction for how to proceed if any of the road decommissioning ground disturbance takes place within the Wilderness boundary. In the area of this project, the boundary is set back from the existing road by 100 feet. We are attaching a copy of the final Wild Sky Wilderness boundary map and legal description (USFS map dated 29Nov10 and a copy of the legal description of the boundary for the Ragged Ridge portion of the Wilderness [page 9] as attached) for reference. Wilderness management regulations may allow the Forest Service to authorize mechanized equipment to restore wilderness character in very limited circumstances. However, we do not recommend any such action and should any re-contouring be needed, it is best done by manual labor.

3. We had requested that in disturbed areas, that soils be scarified and planted with native plants and trees of local provenance and to limit seeding of non-native plant species in order to ensure long term erosion control so as to limit impacts on wildlife and fish habitat. The EA paragraph 2.9 (page16), second paragraph, is somewhat unclear as to the full intent of re-vegetating with native species since it states “Once the decommissioned roadway is removed, soil decompaction and placement of organic materials, including forest duff salvaged during clearing and grading, would prepare the site for restoration where planting is feasible.” Please revise the EA direction to state that native plants will be utilized for site restoration to the greatest extent practicable.
4. We had noted that the new road construction will cause environmental impacts and had requested that in order to reduce these impacts any unneeded spur roads in the vicinity of the project should be identified and then decommissioned. We find that the EA does not address this important mitigation aspect. These closures will improve wildlife and fish habitat and reduce the likelihood of trash dumping, which has been a real problem in this area. We request that the EA be revised to address this concern.

5. We had requested that new road width be limited in width both in terms of travel lanes, shoulders, and related cleared areas so that the new segment as rebuilt would be similar to or narrower than the existing alignment. We had also requested a roadway design to accommodate a maximum speed limit of 35 mph. The EA paragraph 2.8 (pages 15-16) satisfactorily address these requests by specifying 22-foot travel lanes with one-foot shoulders and a 35 mph speed limit. It is important that the new road not be a “freeway in the woods” as has been constructed in other FHA projects on Washington National Forest lands (Icicle Creek and the Cle Elum River) such that the road will retain a quiet, low speed, and backcountry character. This requirement appears to be met per EA paragraph 2.8 (page 15). However, while the “cleared area” has been addressed (EA paragraph 2.8), all steps should be taken consistent with safety to minimize the extent the “cleared area” during construction as well as after the project is complete. Guard rails should only be used if safety is at issue.

6. The EA should be revised so as to be more explicit on dealing with the question of ensuring maximum protection of water quality and salmon habitat both during construction phase and in the later period of on-going use. This issue must be addressed by both the design and construction requirements. It is expected that Snohomish County will provide on site inspection during construction to ensure that all standards are met.

Thank you for considering our views on the project. We look forward to the next phase of the detailed design and subsequent review processes. Please keep the undersigned on the mailing list for this proposal.

Donald Parks
National Forests Committee Co-Chair
Sierra Club Washington State Chapter
Tel.: 425-883-0646
Email: dlparks398@gmail.com
Washington State Chapter
180 Nickerson Street, Suite 202
Seattle, WA 98109
October 31, 2016 Supplemental

Crilly R. Ritz, Senior Planner
Snohomish County Public Works
3000 Rockefeller Ave, M/S 607
Everett, WA 98201

RE: Environmental Assessment Index-Galena Road, dated September 2016

Dear Ms. Ritz:

The Sierra Club is submitting supplemental comments at this time on the subject project. These comments are in addition to and clarification of the comments we sent your office on October 20, 2016 in a letter dated October 31, 2016. Please retain those comments you already have received from us.

We wish to clarify our comment on unneeded road removal in the vicinity of the subject project in our item #4 in our letter dated October 31, 2016. Earlier we had written “We had noted that the new road construction will cause environmental impacts and had requested that in order to reduce these impacts any unneeded [emphasis added] spur roads in the vicinity of the project should be identified and then decommissioned.” We would like to clarify that position and state for the record that we support the Preliminary River Access Plan for Milepost 6.9 as described in Appendix G that includes provisions to retain a short segment of the old road to facilitate river access for recreation.

Additionally, we would like to point out the very substantial cost of this road re-construction project when compared to other pressing needs for dollars to ensure access to other locations in Snohomish County’s Cascade Mountain region. We note the Index-Galena’s one half-mile long
project is expending similar resources compared to the entire Middle Fork Snoqualmie road project in King County. We would also point out that this repair does not address other Index-Galena road segments that may also be exposed to flooding and washout in the future. In particular, there are a number of locations near and below the concrete bridge in Section 20 (T28N-R11E) that are exposed to storm damage in the future events. Consequently, the optional access route over Jack’s Pass might be a more optimum solution to this access challenge.

Thank you for the opportunity to comment on this project. Please keep us on your mailing list for future developments for this proposal.

Donald Parks
National Forests Committee Co-Chair
Sierra Club Washington State Chapter
Tel.: 425-883-0646
Email: dlparks398@gmail.com
Mr. Crilly Ritz  
Senior Planner  
Snohomish County Department of Public Works  
3000 Rockefeller Avenue  
Everett, WA 98201

Sent via electronic mail to Crilly.Ritz@snoho.org

Re: Environmental Assessment (EA) for repair from Milepost 6.4 to 6.9 of the Index-Galena Road

Dear Mr. Ritz:

On behalf of Pilchuck Audubon Society’s 1150 members in Snohomish County and Camano Island, I submit these comments for the EA - Index-Galena Road Project: Milepost 6.4 to 6.9.

Pilchuck Audubon Society (PAS) supports the intent to relocate the Index-Galena Road from Mileposts 6.4 to 6.9 in the North Fork Skykomish River Valley, to restore, enhance and protect water quality and endangered species habitat, as well as public road access.

We have reviewed this EA and offer the following comments:

1) We welcome the road standard design favoring a smaller route footprint designed for 40 miles-per-hour (MPH) with a recommended 35-MPH speed limit.

2) PAS is pleased that your proposal rebuilds outside of the 100-year floodplain and migration zone, and removes the remnants of the damaged roadway from the floodplain. The Mt. Baker-Snoqualmie National Forest Land Management Plan (MBSNF) recommends portions of the North Fork Skykomish River as suitable for future congressional designation under the National Wild and Scenic River Act of 1968.

3) As noted in your EA, roads have become important vectors by which invasive vegetation species and noxious weeds move into our national forests. Your proposed defensive measures in the staging and construction areas, and use of weed-free soil and rock imported to the site, strengthen the battle waged outside of the national forest as well as within.

4) Use of native plants for revegetation and restoration on land and wetlands in the project area, following the US Forest Service’s “best management practices” guidelines and requirements, is welcomed. Where temporary grass cover is needed, using native seed with documentation of little to no invasive materials is an important part of your mitigation. Ongoing surveys post-construction to monitor for and remove any invasive and non-native vegetation following seeding in the project site is a welcomed part of your proposed work.
5) Potential loss of Northern Spotted Owl and Marbled Murrelet habitat under some of the alternatives was a worrisome issue. It is noted in this EA there are no Marbled Murrelets or Northern Spotted Owls nesting or otherwise occupying the project area, and there are no old-growth timber stands in the project area. You note that it is possible Marbled Murrelets may use the river corridor to access its critical habitat in higher elevation old-growth stands.

Your identification of critical habitat areas for these birds with help of the US Forest Service, WA Department of Fish and Wildlife and US Fish and Wildlife Services is very informing. Pilchuck Audubon Society supports your proposal to "...minimize impacts from noise to marbled murrelets flying along the river corridor..... (Construction work) would begin 2 hours after sunrise and stop 2 hours before sunset between April 1 and September 23." This is consistent with state and federal wildlife agencies’ new recommendations. We appreciate your adoption of these newer recommendations than previous ones which extended only from April to July/August.

6) We ask that the contractors be required to “police” their staging and construction areas to remove waste which attracts Steller’s jay and Western Scrub-Jay, American Crow and Common Raven. These predators are known to feed upon Marbled Murrelet and Northern Spotted Owl eggs and fledglings.

7) Thank you for your consideration of and reference to the Mt. Baker-Snoqualmie National Forest’s Aquatic Conservation Strategy (ASC) in your consultation and mitigation sections. As you note in the EA, it is "...a primary component of the MBSNF Plan for protection of aquatic and riparian-dependent species.” Compliance with the mitigation recommendations is noted.

PAS appreciates the opportunity to comment on this beneficial project. It reopens a popular public scenic drive and recreation area in Snohomish County. It restores easier access to public and private lands, trailheads, and to two popular campgrounds (San Juan and Troublesome Creek) damaged by the November 2006 floods. Once the road is opened, more complete repairs can be made to the campgrounds which suffered flood damage. It also reopens access to river launch and take-out sites and improves instream safety for personal and commercial whitewater boaters. The North Fork Skykomish River is among the state’s more popular whitewater sports sites.

We join with other outdoor recreation and conservation groups in urging Snohomish County to complete this project. Thank you for the work.

Sincerely,

/s/

Allen Gibbs
Chair, Conservation Committee
Pilchuck Audubon Society
agibbspr@gmail.com
425-338-5466
October 31, 2016

Crilly Ritz
Senior Planner
Snohomish County Department of Public Works
3000 Rockefeller Avenue
Everett, WA 98201
Sent by electronic mail to crilly.ritz@snoco.org

RE: Draft Environmental Assessment (EA) for the Repair of Milepost 6.4 – 6.9 of the Index-Galena Road

Dear Mr. Ritz:

The undersigned conservation and recreation organizations submit this letter in support of the proposed Index-Galena Road repair at mile post 6.4-6.9. We support the proposed repairs which will serve the dual purpose of restoring recreational, landowner, administrative and emergency access to the Index-Galena Road while also protecting the North Fork Skykomish River and the durability of the road by moving the route out of the river migration zone.

Preserving the Legacy of the Wild Sky Wilderness

Many of our organizations were deeply involved in the development and passage of the Wild Sky Wilderness Act of 2008. Early on, proponents of that proposal along with Senator Patty Murray and Congressman Rick Larsen reached out to local stakeholders. It was clear that local residents and recreation users placed significant value on the access provided by the Index-Galena Road. After the road washed out in 2006, Sen. Murray and Rep. Larsen worked with the Forest Service, Snohomish County and others to adjust proposed wilderness boundaries along the road corridor to ensure that continued road maintenance would not be impacted by a designation, which occurred in 2008. We appreciate that the EA (Pg. 78-79) acknowledges the Wild Sky Wilderness and indicates that the proposed realignment of the road segment is outside the Wilderness boundary.

The boundaries of the Wild Sky Wilderness were also drawn to protect the tributaries of the North Fork Skykomish River, which has been identified as suitable for Wild and Scenic designation under the Wild and Scenic Rivers Act. We appreciate that the EA (Pg. 89-90) addresses the river’s suitability with respect to the Mt. Baker Snoqualmie National Forest Management Plan and the need to protect its free flowing character and outstandingly remarkable values.
Restoring and Enhancing Recreational Access

The repair of the Index-Galena Road will restore access to low elevation, multi-season recreational opportunities along the popular North Fork Skykomish River. We appreciate that the EA identifies the recreational access benefits associated with this project (EA Pg. 94-95). The Index-Galena road provides drive-in access to popular family destinations, popular launch sites for world-class whitewater boating opportunities, as well as incredible hiking, equestrian, cross country skiing, snowshoeing and climbing trails in the Wild Sky and Henry M. Jackson Wilderness Areas. These recreational destinations include:

- Blanca Lake Trail (#1052)
- Troublesome Creek Nature Trail (#1079)
- Quartz Creek Trail (#1050)
- North Fork Skykomish Trail (#1051)
- West Cady Ridge Trail (#1054)
- Curry Gap Trail
- Bald Eagle Trail (#650)
- Pass Creek (#1053)
- Troublesome Creek Campground
- San Juan Campground
- North Fork Skykomish Whitewater Run (Let’s Make a Deal Rapid, Rooster Tail Rapid, and El Niño Rapids)
- Silver Creek Whitewater Run

Additionally in 2013, a Wild Sky Trail study produced by the Forest Service has identified a number of additional trails as potential opportunities along the same road corridor including the Frog Mountain Trail and Mineral Butte Trail.

While these destinations may be reached by way of a long detour on the mostly unpaved Beckler Road (FS #65), the Index-Galena Road provides the logical route for visitors coming from the Puget Sound region and as noted in the EA is a safer alternative particularly during winter months when the Becker Road is inaccessible. Additionally, the road is paved all the way to Troublesome Creek.

The repair of the Index-Galena Road will bring with it economic benefits as well. Each year in Washington, outdoor recreation generates $21.6 billion in consumer spending and 200,000 direct jobs. The steady flow of visitors is critical to the economies of small towns in the Skykomish Valley like Index. Visitors stop to spend money on meals, buy groceries, purchase gear, sign up for paddling, horseback riding, backpacking or other recreational trips, and stay overnight at hotels and vacation rentals in towns that are the gateway to Wild Sky Country.

We feel that the rerouted section of road should be limited in width (i.e., travel lanes, shoulder, and clear zone) to be the same or narrower than the existing alignment in order to retain a quiet, low speed, and backcountry character. We support that the EA (Pg. 15-16) specification for a 22-foot paved surface with 10-foot travel lands and 1-foot shoulders designed for a 35 mph speed limit.

Balancing Recreational Access and a Sustainable Road System

Our organizations value access to our public lands, while working to protect them for future generations. We support repair and enhancement of important access roads like the Index-
Galena Road. At the same time, we also support decommissioning those Forest Service roads that do not provide planned recreational access, but carry high aquatic risk to our watersheds due to excessive maintenance costs. Many of the undersigned organizations are members of the Washington Watershed Restoration Initiative, which has worked to advocate for federal funding since 2008 to address these legacy roads through strategic repairs, stormproofing, and decommissioning to address water quality issues and restore fish passage.

Since federal funds will be sought for this project, we urge the County to carefully choose a final decision that is a cost-effective option to restoring recreational and administrative access to the Index-Galena Road. In the face of increasing storm events and climate change, we all share an interest in ensuring that the limited federal funds available for our road access to our national forests goes as far as possible.

We believe that the proposed action can be carried forth in a manner that benefits aquatic resources, enhances the wild and scenic values of the river, and restores access to outstanding recreational opportunities within the North Fork Skykomish corridor.

Thank you for the opportunity to provide comments on the Environmental Assessment.

Sincerely,

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October 31, 2016

Crilly Ritz, Senior Environmental Planner
Snohomish County Public Works
3000 Rockefeller Avenue, M/S 607
Everett, WA 98201

Subject: Index-Galena Road MP 6.4-6.9 Environmental Assessment

Mr. Ritz,

The Tulalip Tribes have reviewed the referenced Environmental Assessment and have the following comments. The Tulalip Tribes is the successor in interest to the Snohomish, Snoqualmie, Skykomish and associated dependent tribes who were parties to the Treaty of Point Elliott of January 22, 1855 (12 Stat. 927). Through this Treaty, the Tribes reserved and the US Government guaranteed, vital inherent rights of taking fish at usual and accustomed grounds and stations, as well as hunting and gathering on open and unclaimed lands. Indian treaty rights are property rights protected under the fifth amendment of the U.S. Constitution. *Menominee Tribe of Indians v. United States*, 391 U.S. 404, 88 S.Ct. 1705 (1968).

The Tulalip Tribes’ treaty-reserved fishing rights have been consistently confirmed by the Federal District Court, *U.S. v. Washington*, 459 F. Supp. 1020, 1038 (W.D. Wash. 1978); *U.S. v. Washington*, 626 F. Supp. 1405, 1527 (W.D. Wash. 1985), Aff’d, 841 F.2d 317 (9th Cir. 1988). The right to take fish includes the right to habitat protection to support continuation and enhancement of fish runs. *United States v. Washington*, (W.D. WA 2007) WL 2437166. The Tulalip Tribes also possess significant rights and obligations to co-manage fisheries and habitat protection with the federal government and the State of Washington. The Tribes are federally recognized with its community and tribal government located on the Tulalip Indian Reservation in Snohomish County, Washington.

The proposed project would relocate a damaged roadway along the North Fork Skykomish River, moving most of it out of North Fork Skykomish floodplain, which the Tribes favor. This roadway revision removes floodplain impacts from the old road and in turn improves ecological floodplain processes. On the other hand, the relocation should not replace old impacts with new ones. Construction designs need to consider the resources present, appropriate approaches and existing conditions. The reviewed EA attempts to describe
potential impacts and the proposed approach to addressing impacts, unfortunately, the potential impacts and mitigation can only be understood with the project details and plans, details not contained in the EA. The following comments focus on the limited information provided in the Environmental Assessment and are restricted to aquatic resources.

Construction Erosion and Sedimentation
Comment 1. Snohomish County should use its 2016 Drainage Manual for stormwater designs on the project or show the proposed designs exceed the requirements set forth in the manual.

Comment 2. Stormwater treatment for the project relies on natural dispersion, however only 10% of the project area meets the physical requirements for natural dispersion. Where and how natural dispersion is used on the site is left into question in the EA.

Comment 3. Exposing new shallow ground water sources should be anticipated during construction. Best Management Practices to route and manage groundwater are strongly suggested (e.g. pumping or dewatering).

Construction in Floodplain
Comment 4. Approximately 7,100 square feet of disturbance will occur within the 100-year floodplain and will consist of a buried revetment. This is probably an improvement over the pre-existing condition, but can result in new impacts such as locking the river in that location. Have other actions upstream of the project site (e.g. log jams) been considered to shift the river away from that section of the road?

Fish Impacts
Comment 5. Machinery is recommended to be used to remove asphalt and other debris from existing channels that contain rearing salmon. Expecting fish to move out of the way as stated on Page 59 is inadequate. Fish removal should be required prior to disturbing water bodies containing fish.

Comment 6. Large woody debris is proposed to be installed in an area that will receive rock protection in the river. The effectiveness of the wood depends on the designs, details not included in the EA.

Comments 7. Depending on existing conditions in the adjacent channels, the addition of large woody debris should be added to the project designs.

Comment 8. The EA mentions mitigating for wetland impacts and buffer impacts, however it is unclear where and how that mitigation will be accomplished. Approximately 1 acre of riparian buffer will be created in the old roadway, but is that enough? The EA documents permanent wetland impacts at 950 square feet. I did not see in the EA how these impacts will be mitigated.
The Tulalip Tribes depend upon salmon and shellfish for economic and cultural sustainability. The proposed project if not planned, mitigated, designed and constructed properly, can result in continued losses of resources the Tribes depend upon. As salmon disappear, tribal cultures, communities and economies disappear. The Tulalip Tribes are in favor of removing most of the road out of the floodplain as proposed, but remain concerned with the construction designs and mitigation for project impacts and wish to be consulted on the project designs.

Sincerely,

Kurt Nelson, Environmental Division Manager
Tulalip Tribes Natural and Cultural Resources Department
October 31, 2016

Crilly Ritz, Senior Planner
Snohomish County Department of Public Works
3000 Rockefeller Avenue
Everett, WA 98201
Email: Crilly.ritz@snoco.org

Re: Draft Environmental Assessment for the Restoration of the Index-Galena Road

Dear Mr. Ritz,

The City of Sultan would like to submit this letter of support to continue with the project to restore the Index-Galena Road as soon as possible.

The Sky Valley economy is primarily based on tourism and especially, outdoor recreation. We have formed a group called the Sky Valley Recreation Planning Group. It is open to anyone who would like to attend but it’s main purpose is to bring all of the public land managers together every other month to report on their activities and plans. The Sky Valley has an unusually high percentage of public lands and their management directly impacts the health and wellbeing of the entire area. Representatives include: US Forest Service, State Parks, Dept. of Natural Resources, Fish & Wildlife, County Parks, elected officials from Congresswoman Del Bene, Senator Pearson, all of the cities and towns in the Sky Valley. It also includes special interest groups like Sierra Club, Forterra, Trout Unlimited, Shooting Sports, and many more. It is a diverse group but the core belief and common ground is that we all care about the land and opportunities here in the Sky Valley.

When the Sky Valley Wilderness area was created the one promise that was made to the local area is that it would always have road access through it. When the road washed out in 2006 we were told that it would reopen in 2015. It was discussed at almost every S.V. Recreation group meeting but still 2015 came and went. We appreciate the work that has gone into this plan and believe that it will be the best investment to completely remove the road from being threatened by the river again to the location that has been identified in the plan.
We also appreciate the fact that the economy of the Sky Valley and the impacts of outdoor recreation are being recognized and understood. If we are to preserve the legacy of the Wild Sky Wilderness area we need to allow people to have a relationship with it.

Respectfully submitted,

[Signature]

Kenneth G Walker
City Administrator
Via email to: crilly.ritz@snooco.org

Crilly Ritz, Senior Environmental Planner
Snohomish County Public Works
3000 Rockefeller Ave., MS 607
Everett WA 98201

RE: Index-Galena Road MP 6.4 - 6.9 – Environmental Assessment Comments

To Whom It May Concern:

These are comments of the Alpine Lakes Protection Society (ALPS) on the Index-Galena Road mile 6.4 to 6.9 replacement project. ALPS has been concerned with all facets of conservation in the North Fork Skykomish valley for many decades. ALPS was very active in getting the Wild Sky Wilderness designated, and we are greatly concerned with recreational use and all future developments and actions in the North Fork valley.

This project has gone on far longer and escalated in cost far beyond what seemed possible ten years ago when a storm moved the North Fork Skykomish river to an area once occupied by the North Fork road. ALPS strongly supports responsible recreational use of National Forest lands in general and such use in the North Fork Skykomish in particular, for utilization of both Wilderness and non-Wilderness opportunities. We understand and support the need for “access” to National Forest lands, especially those areas so close to the metropolitan areas of greater Seattle.

ALPS supports maintaining some sort of way to drive into the upper North Fork Skykomish valley, to the trailheads accessing Quartz Creek and Cady Ridge. However, we question whether this project, as presented, represents the optimum route to achieve that goal. The sheer cost of it, when there are so many other roads in Snohomish County in need of attention, makes us wonder if it is a best use of limited funds.

Even with the substantial costs of this project, there is certainly no guarantee that other vulnerable segments of the Index-Galena road will survive future weather events. Despite the breathtaking pricetag, we believe that corners are being cut. No kind of adequate provision is being made to deal with runoff from the new road. Retaining walls are proposed to be anchored by drilling into toeslope hillsides where there is a worrisome chance that a pressurized aquifer might be punctured, which could unleash mud and debris into the North Fork and heavily damage the reconstructed road segment. Apparently there are no plans to adequately investigate whether that might be the case.
ALPS believes that both Snohomish County and the Forest Service need to take a step back and look at the broader question: what is the least cost (financial and environmental), lowest exposure to future storm damage, and best way to provide recreational access to the upper North Fork valley?

As you know, there is another way into the upper North Fork, up the Beckler River and over Jack Pass. ALPS believes it would be far better to conduct a study of which route into the upper North Fork is optimum, and least exposed to storm damage over the long run. There are so many problematic and precarious stretches of the North Fork road that it is unwise to simply “fix” this one when there is such a high likelihood of failures in other places.

Snohomish County should to look at access to the entire area, as a whole. The road’s long term viability needs to be assessed along its entire length. This could best be done by some independent entity, not by county staff. The Index-Galena route’s viability needs to be weighed against the alternative Beckler route. The Beckler route is located a bit farther east where there may be at least some rain-shadowing effect from the greater extent of mountains to the west. It is just possible that it may be slightly less subject to full force of storms sweeping in from the west. Forests there are a bit drier and more open than those farther west where this project in question is located.

No kind of broader analysis like this has been done, to our knowledge. If an impartial analysis concludes that the Beckler offers a more viable route to the upper North Fork over the long-term, that is where resources should go. However, we can’t help but wonder if the impetus to expend substantial resources on this one segment of the North Fork road is driven by the handful of cabin owners at Galena so as to more easily access their properties. If so, it is a horrible misallocation of scarce public funds which might be far better spent to benefit more people. Property owners at Galena ought to have known when they purchased their lands that motorized access was not be guaranteed by the taxpayers to access their land located so deep into the mountains.

To sum up, ALPS believes it would be a mistake to simply focus on this one small piece of road when there are broader questions that need to be answered first. It would be a mistake to throw so much money at this one small stretch of road. Snohomish County and the Forest Service both need to step back, ask what the real goal here is, and how best can it be achieved.

Thank you for considering these comments.

Sincerely,

ALPINE LAKES PROTECTION SOCIETY

Karl Forsgaard, President

By default the Alpine Lakes are here... by design they will remain.
Oct 31, 2016

Crilly Ritz  
Senior Planner  
Snohomish County Dept. of Public Works  
3000 Rockefeller Ave.  
Everett WA 98201

Regarding the Draft EA for the Repair of the Index-Galena Road- Milepost 6.4-6.9

Mr. Ritz,

Back Country Horsemen of Washington would like to thank you for the opportunity to comment on the project plans for the relocation and repair of the Index-Galena road. The fact sheets for the project present a good overview of the project and of the proposed engineering improvements that are designed to permanently reopen this section of the road. As was pointed out in your fact sheet this project will restore essential travel for property owners, re-establish a route for emergency service providers, re-establish a route for forest service staff, and reopen an access route for recreational users to this part of the Mt. Baker-Snoqualmie NF. Moving the roadway out of the river flood area should permanently avoid another extended closure and will allow multi-season access to this beautiful and popular area. Our organization, Back Country Horsemen of Washington enthusiastically supports this effort.

Relocation of the road away from the river will enhance the scenic aspect of the river corridor and provide environmental protection to the waterway while ensuring that the road is less likely to fail. Our organization has identified one concern with the road design regarding travel lane width. The Quick Facts bullet point on page 1 of the Project Fact Sheet states that the new road will consist of two 10 foot travel lanes. Design documentation for Milepost 6.4-6.9 provides for 10 foot travel lanes, with 1 foot shoulder. This configuration will be narrower than the standard 11 foot travel lane width typical for rural collector roads as published in Table 1 on page 14 of the Index Galena Flood Repair MP 6.4-6.9 – Design Report. [Travel Lane Width 11 ft AASHTO

Back Country Horsemen of Washington (BCHW), is a 501 (c) (3) organization with 32 chapters across the state dedicated to: keeping trails open for all users; educating horse users in Leave-No-Trace practices; and providing volunteer service to resource agencies.
Narrowing this section of the road will be disadvantageous for travelers with truck trailer combinations such as those used by equestrians and by campers. It is our opinion that the entire road should be of consistent width as safety measure for trucks that haul stock trailers, camp trailers and for emergency and fire traffic. The road and bridge need to be able to safely accommodate the recreational user groups, property owners and the agency personnel that will access this area.

Back Country Horsemen of Washington is a 501(c3) organization dedicated to keeping trail access open to all. Our volunteers spend thousands of hours annually working on trails in Washington State, over 70,000 hours in 2015. We collaborate with several recreational groups to make sure that trails are open and usable. We advocate for the ability of all recreational users to get out into the forests and the wild country of Washington and to enjoy this beautiful country.

The reopening of the Index-Galena road is a valuable and much anticipated project for Back Country Horsemen of Washington. Thank you again for the opportunity to provide comments.

Sincerely,

s/ Kathy Young
President
Back Country Horsemen of Washington
president@bchw.org
Crilly Ritz
Snohomish County Public Works
3000 Rockefeller Ave., M/S 607
Everett, WA 98201
crilly.ritz@snoco.org

RE: Comments on Environmental Assessment for Index-Galena Road Repair, Mile Post 6.4-6.9

Dear Mr. Ritz:

Our organizations and businesses are writing to voice our strong support for repairs to the Index-Galena Road at milepost 6.4-6.9 in Index, Washington. We support the Purpose and Need in the Environmental Assessment that the Index-Galena Road is a vital transportation link to the upper North Fork Skykomish River area. The proposed repairs will restore access for whitewater boating and recreational activities on the North Fork Skykomish River by rebuilding a section of road that has been impassable for over a decade.

We strongly support restoration of vehicle access along the North Fork Skykomish River corridor in light of its regional importance for river-based recreation. The current 42.5 mile detour up the Beckler River Road and over Jack’s Pass is an inconvenience, is a safety risk for travelers, and is largely unavailable during the winter and spring whitewater boating season. The river is a State Scenic Waterway and has been recommended by the Forest Service for Wild and Scenic designation in part due to its significance as a recreational resource. With this status, there are important considerations with respect to construction projects that could impact river values, and we believe the project as proposed is designed to protect and enhance the river-dependent values unique to the North Fork Skykomish River.

Importance of the North Fork Skykomish for Whitewater Recreation

The high quality scenic values of the North Fork Skykomish River and the unique whitewater attributes of this run are highly desired by intermediate to advanced paddlers and distinguish this river as one of the region’s best whitewater runs. The season for the river begins with fall rains in October, continues through the winter, and in most years extends into early summer as long as snowmelt maintains elevated flows. In a survey of whitewater enthusiasts on Whitewater Paddling in the North Cascades,¹ American Whitewater found that the North Fork Skykomish was one of the most popular rivers in the North Cascades (41% of paddlers had done the run), it was rated as having outstanding recreational and aesthetic qualities of regional and national significance, and it was identified as one of the top five favorite runs out of 158 recognized whitewater runs in the North Cascades. In a study of River Recreation in Washington

¹ http://www.americanwhitewater.org/content/Document/view/documentid/554/
State, the National Park Service identified the North Fork Skykomish as having "Grade A" qualities for whitewater recreation. The reputation of the river extends beyond the boundaries of the state and the river is well known to paddlers from across the country and around the world—in fact, it is one of two rivers in the state featured in the book *World Whitewater*, a guidebook to the world's best whitewater.

The North Fork Skykomish was identified as a potential Wild and Scenic River in the Nationwide Rivers Inventory (NRI) published by the National Park Service in 1982. The Forest Service conducted a formal suitability review of the river for Wild and Scenic designation during the most recent forest planning process. As an outcome of that process, the river was recommended to Congress for designation as a National Wild and Scenic River for its scenic, recreation, fish, and wildlife values. The Forest Plan specifically notes that the North Fork Skykomish receives high recreation use, much of which "is oriented toward river activity" and that the river is one of Washington State's most "continuously challenging whitewater rafting and kayaking runs, with 11 miles of class III or IV river." The North Fork Skykomish River is currently part of the Washington State Scenic River System, the legislative purpose of which is to "protect and preserve the natural character of such rivers and fulfill other conservation purposes." Rivers in the system "shall be preserved in as natural a condition as practical." Finally, a planning effort is underway with Snohomish County Parks and the National Park Service Rivers and Trails Conservation Assistance Program to establish the Sky to Sound Water Trail. Restoring road access to the North Fork Skykomish River is critical to realizing the full potential of this water trail.

*General Project Comments*

We agree with the analysis in the Environmental Assessment that the project will have many positive benefits including restoration of roadway connectivity, relocation of the road out of the 100 year floodplain and channel migration zone, and a footprint that will minimize vegetation clearing and land disturbance. We agree that this project will enhance the free-flowing condition of the North Fork Skykomish River and enhance river values that include scenic, recreation, fish, and wildlife that collectively make the river suitable for Wild and Scenic River designation. The Forest Service Handbook provides management guidelines that must be used when carrying out projects and activities.

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4 [https://www.nps.gov/nrcc/programs/rtca/nri/states/wa2.html](https://www.nps.gov/nrcc/programs/rtca/nri/states/wa2.html)
7 Revised Code of Washington 79A.55.
8 Revised Code of Washington 79A.55.005
10 FSH 1909.12, 82.5
The preferred alternative that will reroute the road from milepost 6.4 to 6.9 is consistent with guidance for projects along a suitable Wild and Scenic river. Specifically, moving the road corridor out of the floodplain and channel migration zone will enhance the free-flowing character of the river. It will protect and enhance outstandingly remarkable values by enhancing the scenic experience from the river, restoring recreational access, protecting fishery values by removing a segment of road out of the floodplain, and protecting the river-dependent wildlife values by restoring floodplain habitat along the alignment of the old road. The project will have an impact on terrestrial resources but the opportunity to protect and enhance the river-dependent values is significant. This segment is along a section of the river identified for recreation classification and as stated in the Forest Service Handbook, “new roads and railroads are permitted to parallel the river if such construction fully protects river values (including river’s free-flowing character).”¹¹ We believe the project as proposed will meet this standard. The project will also be consistent with the State Scenic Waterway designation and by moving the road out of the channel migration zone it will “protect and preserve the natural character of [the] river;” by allowing the river to more freely migrate within the floodplain it will serve to preserve the river in “as natural a condition as practical.”¹²

*Specific Comments on Project Design*

We support the application of a design standard for a Very Low Volume Roadway with 22’ pavement width and a 35 mph design speed. This design fits the natural forest environment. While clear zones are not specified, we assume from Exhibits 43 and 44 illustrating Before/After Visual Simulation that clear zones will be minimal to protect the scenic character of the road corridor.

We support the Preliminary River Access Plan and Conceptual Design presented as Appendix G. This access point at milepost 6.9 was used as a take-out prior to the road washout. We request that the Final Environmental Assessment explicitly classifies this site for management as a day-use area so that it remains accessible for river access. The site is not appropriate for overnight use; public and private campgrounds are available for overnight use in close proximity to this site.

*Conclusion*

Thank you again for the opportunity to provide comments on this project. We fully support the preferred alternative in the Environmental Assessment. We look forward to enjoying restored access to this river that has historically provided one of the most highly valued whitewater recreation opportunities in the state. We believe the project can be completed in a manner that restores the access and the unique river-dependent recreational values, while enhancing the scenic, fish, and wildlife benefits of pulling a segment of road out of the channel migration zone. The added benefit of this project will

¹¹ FSH 1909.12, 82.51.4c
¹² RCW 79.72
be a reduction in long-term maintenance costs. If you have any questions regarding our
interests in the project please do not hesitate to contact us.

Sincerely,

Wendy McDermott
Director, Rivers of Puget Sound and Columbia Basin
American Rivers
Bellingham, WA
<wmcdermott@americanrivers.org>

Thomas O'Keefe, PhD
Pacific Northwest Stewardship Director
American Whitewater
Seattle, WA
<okeefe@americanwhitewater.org>

Blair Corson
Owner
Bush House Inn
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Jennie Goldberg, Director
League of Northwest Whitewater Racers
Seattle, WA
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William B. Corson
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Dave Mainier
President
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Seattle, WA
<o_boater@hotmail.com>

Danny Mongno
Marketing Manager
Werner Paddles
Sultan, WA
<Danny.Mongno@wernerpaddles.com>
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<td>The substitution of CDFs above the Highway Fund may not be practical.</td>
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<td>2</td>
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<td>The Washington State Department of Transportation Highway Manual states that the Washington Division of Transportation will deviate from the CDFs if the project is not approved by the FHWA.</td>
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<td>3</td>
<td>3.1</td>
<td>The FHWA has agreed that the project has not been as expedited as a typical ER project, but this project is more complex than many emergency repairs. The complexities include the location in a National Forest, the sensitivity of the surrounding environment, and the engineering challenges involved. The FHWA Washington Division has determined that sufficient progress has been made in the development of this project and therefore continues to support eligibility of the Emergency Relief funds.</td>
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The project is currently in the design phase and the tentative schedule is as follows: | Commitments made for your comments | Report date |
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Please note that the comments received and the agency comments have been reviewed and considered in the development of the project.
Throughout the process there has been enormous support for reconnecting this severed section of roadway. Stakeholders such as the US Forest Service, the public, commercial guide services and elected officials have all supported the reconstruction of this roadway.

The FLAP application has been reviewed and the project was approved for programming. The application will not be retracted. A copy of the FONSI, including your comments, will be provided to Western Federal Lands Highway Division.

The project meets the Highway Manual's requirements.

Stormwater dispersion will follow the guidelines put forth in the Highway Runoff Manual. Detailed design has not yet been completed for this project, but the project fits the intent of natural dispersion. Careful consideration of all variables such as slope, groundwater, groundcover, width of dispersion areas, and ability of the dispersion area to fully absorb runoff will be necessary during final drainage design.

Based on the Engineering and Economic Feasibility Analysis completed in September 2013, there are substantial physical site limitations that restrict BMP availability. Utilizing a deviation to slope requirements of the Dispersion area may be the most beneficial solution for environmental impacts and economic impacts without threatening water quality.

Regarding Double-dipping, perhaps this refers to the Equivalent Area Approach, an approved method of treating stormwater in difficult areas. Siting for the Equivalent Area Approach involves upgrading stormwater detention and treatment on a similar roadway area that currently does not have detention and treatment facilities. The Equivalent Area Approach is detailed in both the HRM and the Snohomish County Drainage Manual. The Equivalent Area Approach does not have to be located on the project site, but it must be located within the same receiving water, in this case the North Fork Skykomish River. In any case, the project does not propose this method for stormwater treatment.

The project’s proposed mitigation for adverse effects to listed fish and their habitat was discussed on pages 59-60 of the NEPA EA. It included the following:

- The project would implement several avoidance and minimization measures as part of the project’s design and construction. They would include the following Construction Best Management Practices:
  - At least one employee is designated as the erosion and spill control (ESC) lead. The ESC lead is responsible for installing and monitoring erosion control measures and maintaining spill contaminant and control equipment.
All BMPs will be removed after construction is complete and the site stabilized.

Conservation measures to avoid and minimize impacts would include:

- The project would remove the remaining portions of the damaged road from the river.
- Work would not inhibit passage of any adult or juvenile salmonid species during or after construction.
- In-water work would be conducted during the prescribed work window conditioned in the issued HPA. This is anticipated to be during the “Times When Spawning or Incubating Salmonids are Least Likely to Be Within Washington Fresh Waters” which is August 1-August 31.
- All reasonable and prudent measures would be taken to ensure fish are excluded in compliance with the WSDOT Fish Exclusion Protocols and Standards (2012).
- 8.3 acres of temporary disturbance would be restored with native plants and salvaged forest duff material.
- Bridge piers and abutments would be built landward of the ordinary high water mark (OHWM) to minimize impacts to the stream and wetland.

6B. "Redesign all retaining walls to be free standing, cantilever walls, with no tie-backs drilled into the mountain."

The final design for retaining walls is not completed yet. Final determination of the retaining wall structures will be made during the final design process, as discussed on page 43 of the NEPA EA: "Retaining walls may be constructed in areas based on geotechnical recommendations, including structural earth walls (SEWs). The linear extent of these features and location may change during final design based on further analysis of detailed survey, geotechnical, seismic, hydrologic, and hydraulic information and construction considerations."

6C. "Provide a detailed evaluation of the visual impacts from a CIP concrete retaining wall in the Wild and Scenic River corridor and propose suitable mitigation for public review comment."

The proposed mitigation for visual quality impacts, including structural finishes and aesthetic treatments for retaining walls is discussed in the NEPA EA on pages 135-136. The NEPA EA in pages 123-148 provides an extensive discussion of visual quality, including existing project area visual quality, project-related impacts, and identifies proposed mitigation for adverse effects. The project has coordinated extensively with the Mt. Baker Snoqualmie National Forest to ensure that the project design is consistent with its adopted Forest Plan visual quality objectives. To clarify, the North Fork Skykomish River is not a designated Wild and Scenic River. As discussed on pages 89-90 of the NEPA EA, it is a recommended Wild and Scenic River with a Recreation designation applicable to the project area. The Forest Plan goal is to protect from degradation the outstanding remarkable values and wild, scenic, and recreation characteristics of recommended rivers and their environments, pending a decision on inclusion into the National Wild and Scenic River System. This allocation is generally applied to National Forest lands within 0.25 mile either side of the main channel of each river that has been recommended for inclusion into the system.

7. "As a part of the no action alternative, evaluate the benefits of creating an unimpeded wildlife corridor in the vicinity of the MP 6.4-6.9 repair."

As indicated on page 65 of the NEPA EA, impacts to wildlife and wildlife habitat were assessed including preparation of a Wildlife Discipline Report. The wildlife corridors' benefits and impacts, and mountain goat use of the area are discussed in more detail in the Wildlife Discipline Report found in both the Technical Appendices of the NEPA EA and on the project's web page.
Restoring riparian areas closer to the river would restore wildlife habitat connectivity and the movement corridor between the higher elevations of the upper North Fork Skykomish and the lower drainage. It is expected that wildlife movement along the river corridor would be enhanced by removing the damaged road and planting the riparian corridor. The findings in the Wildlife Discipline Report show that opening up the Index-Galena Road would lessen the number of vehicles traveling over Jack's Pass, which is considered an important wildlife corridor by the USFS. The low number of vehicles expected on the Index-Galena Road and low speed limit would not create a barrier to most wildlife movement.

Regardless of EA, FLAP, or any other external funding source, Snohomish County as the responsible party for the maintenance of the Index-Galena Road must be required to remove all in-water asphalt at the next low water condition. Asphalt will be removed as part of the project as discussed in the NEPA EA on page 16 and not before: “The project would decommission the existing damaged roadway. Decommissioning would remove this area for use as a roadway and would include removing asphalt pavement, concrete, and other debris from the damaged existing roadway. Roadway debris would be removed from the river channel to the extent that it would be safe and practicable. This will require in-water work with heavy equipment as approved by agencies responsible for aquatic resource protection. Some of the pavement has already been eroded by river flows. The remaining material removed by the project would be disposed of offsite at a facility permitted to accept asphalt and concrete debris. Once the decommissioned roadway is removed, soil decompaction and placement of organic materials, including forest duff salvaged during clearing and grading, would prepare the site for restoration where planting is feasible. This riparian buffer mitigation would restore a forested riparian corridor adjacent to the North Fork Skykomish River. Where planting is not feasible, natural stream channel conditions would be restored with the asphalt removal. Large woody debris would potentially be placed near the upstream inlet to the side channel to enhance in-stream habitat and would be placed within restoration areas to enhance wildlife habitat.”

William Lider supplemented his original October 26, 2016 comment letter with additional comments provided in an October 31, 2016 letter—these are provided below:

I would like to append my comments submitted on October 26, 2016 with the attached photo and excerpt from the Index-Galena Road 60% design drawings showing the proposed tie back wall design. The Attachment 1 photo shows a typical drilled tie-back operation for a retaining wall for a road construction project. The wall shown in the photo is approximately the same height and length for the three retaining walls proposed to be constructed as a part of this project. Note the high pH drilling mud and concrete grout throughout the work area from the tie back installation. At the point shown construction, the timber lagging and tie backs have been installed, but the final concrete forms must be constructed before the wet concrete is placed for the final wall construction. Attachment 2 shows the 60% construction design drawings for the three 25-foot high retaining walls. Because there is no possibility of constructing a sediment pond or Chitosan filtration system in the narrow, 27-foot wide roadway, it can be anticipated that all the drilling mud, pumped out concrete grout, and excess concrete will be disposed of properly.

Water quality construction and roadway operation related impacts and measures to address them are addressed in multiple sections of the NEPA EA: In the Geology and Soils section, construction best management practices (BMPs) and permanent drainage design are discussed on page 43; in the Water Quality and Surface Water section on pages 53-56; and in the Fish, Wildlife and Vegetation section on pages 59-60. The NEPA EA text identifies that the project would develop a Stormwater Pollution Prevention Plan (SWPPP), and best management practices (BMPs) would be implemented to minimize the impacts of construction activities. A Certified Erosion and Sedimentation Control Lead (CESCL) would be onsite during construction to ensure that BMPs installed on the project site are appropriately maintaining acceptable levels of project discharge, in accordance with the rules and regulations set forth by the Department Of Ecology. See responses to comments provided above in 2-6.
With direct impacts to people to allow a relationship with
the land. It is essential to understand the impacts of the river.
We agree and appreciate the effort that the community has
made to address these impacts. We would like to address
the impacts of the river on the local community and the
motion for Robertson not to proceed with the project.

The Sky Valley Chamber of Commerce and the Visitor Information
Center would like to submit this letter of support to continue with the
project to restore the Index-Galena Road as soon as possible.
The Sky Valley economy is primarily based on tourism and especially,
outdoor recreation. We have formed a group called the Sky Valley
Recreation Planning Group. It is open to anyone who would like to
attend but its main purpose is to bring all of the public land managers
together every other month to report on their activities and plans. The
Sky Valley has an unusually high percentage of public lands and their
management directly impacts the health and wellbeing of the entire
area. Representatives include: US Forest Service, State Parks, Dept. of
Natural Resources, Fish & Wildlife, County Parks, elected officials from
Congresswoman Del. Bane, Senator Pearson, all of the cities and towns
in the Sky Valley. It also includes special interest groups like Sierra
Club, Forterra, Trout Unlimited, Shooting Sports, and many more. It is
a diverse group but the core belief and common ground is that we all
care about the land and opportunities here in the Sky Valley.

As you consider this project, we would like to acknowledge the
work that has been done to address these impacts. We appreciate the
efforts that have been made to mitigate the impacts of the river on the
local community. We also appreciate the fact that the economy of the Sky
Valley and the impacts of outdoor recreation are being recognized and
understood. If we are to preserve the legacy of the Wild Sky Wilderness area we need to allow people to have a relationship with
it.

Comments noted. Thank you for your comments.
We had asked that all abandoned sections of pavement, gravel, and riprap rock, and all structural items such as jersey barriers, guide rails, and culverts be removed from the project area. The EA paragraph 2.9 (page 16) satisfactorily responds to this request.

The project limits are located within the existing roadway alignment easements or points further landward. As discussed in the EA, the area within the existing road alignment will have pavement and subsurface materials removed and then be prepared for restoration planting.

We had noted that the new road construction will cause environmental impacts and had requested that any unneeded spur roads in the vicinity of the project should be identified and then decommissioned. We find that the EA does not address this important mitigation aspect. These closures will improve wildlife and fish habitat and reduce the likelihood of trash dumping, which has been a real problem in this area. We request that the EA be revised to address this concern.

The project team coordinated with the Skykomish Ranger District and conducted site visits to determine the feasibility of decommissioning roads in the greater project area. During these site visits, it was determined that some spur roads that branch off Road 63 (aka Index-Galena Road) such as U.S. Forest roads 310 and 312 could be removed from the road inventory. Natural site succession at these locations has revegetated these areas and the U.S. Forest Service determined that on-the-ground decommissioning and other restoration measures are not required. Other roadways in the project area are being reserved for future use, such as mine cleanup for the Trout Creek Road 6320, or future recreation access.
We had requested that new road width be limited in width both in terms of travel lanes, shoulders, and related cleared areas so that the new segment as rebuilt would be similar to or narrower than the existing alignment. We had also requested a roadway design to accommodate a maximum speed limit of 35 mph. The EA paragraph 2.8 (pages 15-16) satisfactorily address these requests by specifying 22-foot travel lanes with one-foot shoulders and a 35 mph speed limit. It is important that the new road not be a "freeway in the woods" as has been constructed in other FHA projects on Washington National Forest lands (Icicle Creek and the Cle Elum River) such that the road will retain a quiet, low speed, and backcountry character. This requirement appears to be met per EA paragraph 2.8 (page 15). However, while the "cleared area" has been addressed (EA paragraph 2.8), all steps should be taken consistent with safety to minimize the extent the "cleared area" during construction as well as after the project is complete. Guard rails should only be used if safety is at issue.

Guard rails are only provided where safety requirements require them to be located. Comment noted. Guard rails are proposed primarily on the riverward side of the roadway, though they will be provided if required elsewhere. As described in the visual quality section of the NEPA EA, the guard rails will have a rusty brown patina color in order to be consistent with U.S. Forest Service visual quality standards. The project has also committed to undergoing a practical design effort as part of final design to see if further project footprint reductions can be achieved.

"The EA should be revised so as to be more explicit on dealing with the question of ensuring maximum protection of water quality and salmon habitat both during construction phase and in the later period of on-going use. This issue must be addressed by both the design and construction requirements. It is expected that Snohomish County will provide on site inspection during construction to ensure that all standards are met." Water quality construction and roadway operation related impacts and measures to address them are addressed in multiple sections of the NEPA EA: In the Geology and Soils section, construction best management practices (BMPs) and permanent drainage design are discussed on page 43; in the Water Quality and Surface Water section on pages 53-56; and in the Fish, Wildlife and Vegetation section on pages 59-60. The NEPA EA text identifies that the project would develop a Stormwater Pollution Prevention Plan (SWPPP), and best management practices (BMPs) would be implemented to minimize the impacts of construction activities. A Certified Erosion and Sedimentation Control Lead (CESCL) would be onsite during construction to ensure that BMPs installed on the project site are appropriately maintaining acceptable levels of project discharge, in accordance with the rules and regulations set forth by the Department Of Ecology. Snohomish County, or other parties as designated, would be responsible for onsite inspection. Thank you for your comments.

The Sierra Club supplemented its original comment letter with comments provided in another October 31, 2016 letter – these are provided below.
provisions to retain a short segment of the old road to facilitate river access for recreation."

Additionally, we would like to point out the very substantial cost of this road reconstruction project when compared to other pressing needs for dollars to ensure access to other locations in Snohomish County's Cascade Mountain region. We note the Index-Galena's one and a half-mile long project is expending similar resources compared to the entire Middle Fork Snoqualmie road project in King County. We would also point out that this repair does not address other Index-Galena road segments that may also be exposed to flooding and washout in the future. In particular, there are a number of locations near and below the concrete bridge in Section 20 (T28N-R11E) that are exposed to storm damage in future events. Consequently, the optional access route over Jack's Pass might be a more optimum solution to this access challenge.

The project has taken cost considerations into account as part of project development both through its selection of design standards that have helped to reduce the project footprint and a commitment to implement Practical Design efforts as part of the final design process. The NEPA EA addresses this issue on Pages 15-16 where it states: "The proposed roadway design is based on design standards contained in the 2001 AASHTO Guidelines for Geometric Design of Very Low-Volume Roadways (ADT < 400). The use of these design standards responds to comments made by the public during the NEPA scoping period to consider use of design standards that would help to reduce the footprint of the proposed roadway relocation repair. These design standards enable the project to match the character of the existing roadway and fit in with the forested natural environment in the project area. For example, the use of low-volume roadway design standards enables the roadway width to be reduced by 26 percent from the 30-foot width standard identified previously in the design report."

"During the final design process, a Practical Design effort would be undertaken to determine if there are other design measures that can reduce project impacts and costs. Practical design is an approach to making project decisions that focuses on the need for the project and looks for cost-effective solutions. These measures could include alignment refinements and other design modifications."

Beckler River Road is not maintained and operated by Snohomish County. The Beckler River Road (aka Forest Road 65) is maintained and operated by the US Forest Service, and extensive portions of the roadway are located in King County, outside of Snohomish County jurisdiction.

Thank you for your comments.

1) "We welcome the road standard design favoring a smaller route footprint designed for 40 miles-per-hour (MPH) with a recommended 35-MPH speed limit." Comment noted.

2) "PAS is pleased that your proposal rebuilds outside of the 100-year floodplain and migration zone, and removes the remnants of the damaged roadway from the floodplain. The Mt. Baker-Snoqualmie National Forest Land Management Plan (MBSNF) recommends portions of the North Fork Skykomish River as suitable for future congressional designation under the National Wild and Scenic River Act of 1968." Comment noted. Discussion of the recommended Wild and Scenic River designation and its associated requirements are discussed in the Land Use section of the NEPA EA on pages 89-90 and 99-100.

3) "As noted in your EA, roads have become important vectors by which invasive vegetation species and noxious weeds move into our national forests. Your proposed defensive measures in the staging and construction areas, and use of weed-free soil and rock imported from pre-approved sources, will help mitigate this problem.

Comment noted.
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<td>5.1</td>
<td>Joint Comment 13 Conservation / Recreation Organizations</td>
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Many of our organizations were deeply involved in the development and implementation of the proposed project. We encourage clear and consistent communication throughout the final design and implementation phases to ensure the best results.

Thank you for your comments.

Comment noted.

Snohomish County has coordinated extensively with the U.S. Forest Service throughout project development. This U.S. Forest Service in its cooperating NEPA agency role provided extensive guidance and support. This has helped to ensure that the proposed project is consistent with the MBSNF Plan. The project will continue its coordination throughout the final design process and subsequent review processes.

Thank you for your comments.

Comment noted.

5.7 Potential loss of Northern Spotted Owl and Marbled Murrelet habitat under some of the alternatives was a worrisome issue. It is noted in this EA there are no Marbled Murrelets or Northern Spotted Owls nesting or otherwise occupying the project area, and there are no old-growth timber stands in the project area. You note that it is possible Marbled Murrelets may use the river corridor to access its critical habitat in higher elevation old-growth stands. Your identification of critical habitat areas for these birds with the help of the US Forest Service, WA Department of Fish and Wildlife, and US Fish and Wildlife Services is very informing. Pilchuck Audubon Society supports your proposal to “….minimize impacts from noise to marbled murrelets flying along the river corridor….. Construction work) would begin 2 hours after sunrise and stop 2 hours before sunset between April 1 and September 23.” This is consistent with state and federal wildlife agencies’ new recommendations. We appreciate your adoption of these newer recommendations than previous ones which extended only from April to July/August.

Comment noted.

5.6 Use of native plants for revegetation and restoration on land and wetlands in the project area, following the US Forest Service’s “best management practices” guidelines and requirements, is welcomed. Where temporary grass cover is needed, using native seed with documentation of little to no invasive materials is an important part of your mitigation. Ongoing surveys post-construction to monitor for and remove any invasive and non-native vegetation following seeding in the project site is a welcomed part of your proposed work.

Comment noted.

5.5 We ask that the contractors be required to “police” their staging and construction areas to remove waste which attracts Steller’s Jay and Western Scrub-Jay, American Crow and Common Raven. These predators are known to feed upon Marbled Murrelet and Northern Spotted Owl eggs and fledglings.

Snohomish County will develop a special provision to include in the contract documents that requires regular daily cleanup of waste from staging and construction areas. This has been added to the commitments list provided in this FONSI.

Comment noted.

5.4 Use of native plants for revegetation and restoration on land and wetlands in the project area, following the US Forest Service’s “best management practices” guidelines and requirements, is welcomed. Where temporary grass cover is needed, using native seed with documentation of little to no invasive materials is an important part of your mitigation. Ongoing surveys post-construction to monitor for and remove any invasive and non-native vegetation following seeding in the project site is a welcomed part of your proposed work.

Comment noted.

4.1 Joint Comment Letter from 13 Recreation/Conservation Organizations

Many of our organizations were deeply involved in the development and implementation of the proposed project. We encourage clear and consistent communication throughout the final design process and subsequent review processes.

Thank you for your comments.

Comment noted.

4.0 L Joint Comment Letter from 13 Recreation/Conservation Organizations

Many of our organizations were deeply involved in the development and implementation of the proposed project. We encourage clear and consistent communication throughout the final design process and subsequent review processes.

Thank you for your comments.

Comment noted.
The removal of the Index-Galena road will improve access to low-elevation, multi-season recreational opportunities along the popular North Fork Skykomish River. We appreciate that the EA identifies the recreational access benefits associated with this project (EA Pg. 94-95). The Index-Galena road provides drive-in access to popular family destinations, popular launch sites for world-class whitewater boating opportunities, as well as incredible hiking, equestrian, cross-country skiing, snowshoeing, and climbing trails in the Wild Sky and Henry M. Jackson Wilderness Areas.

Comment not noted.

Additionally in 2013, a Wild Sky Trail study produced by the Forest Service has identified a number of additional potential trails, including the Frog Mountain Trail and Mineral Butte Trail. While these destinations may be reached by way of a long detour on the mostly unpaved Beckler Road (FS #65), the Index-Galena Road provides the logical route for visitors coming from the Puget Sound region and as noted in the EA is a safer alternative particularly during

The removal of the Index-Galena road will improve access to low-elevation, multi-season recreational opportunities along the popular North Fork Skykomish River. We appreciate that the EA identifies the recreational access benefits associated with this project (EA Pg. 94-95). The Index-Galena road provides drive-in access to popular family destinations, popular launch sites for world-class whitewater boating opportunities, as well as incredible hiking, equestrian, cross-country skiing, snowshoeing, and climbing trails in the Wild Sky and Henry M. Jackson Wilderness Areas.

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Additionally in 2013, a Wild Sky Trail study produced by the Forest Service has identified a number of additional potential trails, including the Frog Mountain Trail and Mineral Butte Trail. While these destinations may be reached by way of a long detour on the mostly unpaved Beckler Road (FS #65), the Index-Galena Road provides the logical route for visitors coming from the Puget Sound region and as noted in the EA is a safer alternative particularly during
The repair of the Index-Galena Road will bring with it economic benefits as well. Each year in Washington, outdoor recreation generates $21.6 billion in consumer spending and 200,000 direct jobs. The steady flow of visitors is critical to the economies of small towns in the Skykomish Valley like Index. Visitors stop to spend money on meals, buy groceries, purchase gear, sign up for paddling, horseback riding, backpacking or other recreational trips, and stay overnight at hotels and vacation rentals in towns that are the gateway to Wild Sky Country.

<table>
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<tr>
<td>The proposed section of road would be the middle fork of the Tulalip Tribes.</td>
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<tr>
<td>The proposed project would relocate a damaged roadway along the North Fork Skykomish River, moving most of it out of the North Fork Skykomish floodplain, which the Tribes favor.</td>
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<tr>
<td>The project would be limited in width (i.e., travel lanes, shoulder, and clear zone) to be the same or narrower than the existing alignment in order to retain a quiet, low speed, and backcountry character. We support that the EA specification for a 22-foot paved surface with 10-foot travel lanes and 1-foot shoulders designed for a 35 mph speed limit.</td>
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Our organizations value access to our public lands, while working to protect them for future generations. We support repair and enhancement of important access roads like the Index-Galena Road. At the same time, we also support decommissioning those Forest Service roads that do not provide planned recreational access, but carry high aquatic risk to our watersheds due to excessive maintenance costs. Many of the undersigned organizations are members of the Washington Watershed Restoration Initiative, which has worked to advocate for federal funding since 2008 to address these legacy roads through strategic repairs, stormproofing, and decommissioning to address water quality issues and restore fish passage. Since federal funds will be sought for this project, we urge the County to carefully choose a final decision that is a cost-effective option to restoring recreational and administrative access to the Index-Galena Road. In the face of increasing storm events and climate change, we all share an interest in ensuring that the limited federal funds available for our road access to our national forests go as far as possible. We believe that the proposed action can be carried forth in a manner that benefits aquatic resources, enhances the wild and scenic values of the river, and restores access to outstanding recreational opportunities within the North Fork Skykomish corridor. Thank you for the opportunity to provide comments on the Environmental Assessment.
The environmental impact from road construction and maintenance must be minimized to protect and preserve the natural resources within the project area. The construction approach should avoid or reduce impacts on the aquatic, riparian, and upland ecosystems. The following comments focus on the limited information provided in the Environmental Assessment and are restricted to aquatic resources.

Comment 1. Snohomish County should use its 2016 Drainage Manual for stormwater designs on the project or show the proposed designs exceed the requirements set forth in the manual.

See response to Comment 2.1.

Comment 2. Stormwater treatment for the project relies on natural dispersion, however only 10% of the project area meets the physical requirements for natural dispersion. Where and how natural dispersion is used on the site is left into question in the EA.

See response to Comment 2.4.

Comment 3. Exposing new shallow groundwater sources should be anticipated during construction. Best management practices to route and manage groundwater are strongly suggested (e.g., pumping or dewatering).

Existing groundwater conditions are discussed briefly in the NEPA EA and in the Geology, Soils, and Groundwater Report found in the Technical Appendices. On page 45 the NEPA EA states: "Shallow, unconfined groundwater occurs within the alluvium and colluvium deposits that overlie the bedrock in the project area. Groundwater levels range from between about 5 and 15 feet below ground surface (bgs) in the alluvium, and between about 5 and 50 feet bgs in the colluvium. Groundwater also occurs within fractures in the underlying bedrock. Groundwater levels in the bedrock range between about 25 and 50 feet bgs in the project area. Groundwater level measurements in the project area indicate seasonal groundwater level fluctuations of about 10 to 15 feet in the alluvium, colluvium, and bedrock. It is estimated that the shape of the groundwater table generally follows the topography, and that groundwater flows from southeast to northwest in the project area as water drains toward the river and streams."

On Page 30 the Geology, Soils, and Groundwater Report states that: "Permanent subsurface drainage may be installed where groundwater contributes to the potential instability."

An additional mitigation commitment addressing your concerns with regard to impacts to groundwater exposed during construction has been added to the Preliminary Commitment which was contained in Appendix E of the NEPA EA. The final commitment list is contained in this FONSI. A Geotechnical Report will be prepared prior to project advertisement and included in the construction documents and will include geotechnical recommendations.

Comment 4. Approximately 7,100 square feet of disturbance will occur within the 100-year floodplain and will consist of a buried Large woody debris logjams were not considered as a method for roadway protection due to uncertainty as to its permanence and reliability. As discussed in the NEPA EA on Pages 56-57, the existing roadway would be removed and restored to more natural floodplain processes.

The recommended approach is to use erosion control measures and hydraulic flushing to maintain the existing stream channel and maintain the riparian zone. The proposed construction activities, including the use of heavy equipment, will be conducted within the old road alignment to avoid disturbance of existing riparian areas.
revetment. This is probably an improvement over the pre-existing condition, but can result in new impacts such as locking the river in that location. Have other actions upstream of the project site (e.g. logjams) been considered to shift the river away from that section of the road?

The buried rock revetment would provide toe protection in the event of future channel lateral migration in an area where the relocated roadway lies in proximity to but not within the channel migration zone. This activity would result in net removal of material from the floodplain and provide for more floodplain conveyance. The need for and extent of this revetment would be further evaluated during final design. Large woody debris logjams were not considered as a method for roadway protection due to uncertainty as to its permanence and reliability.

Fish Impacts

"Comment 5. Machinery is recommended to be used to remove asphalt and other debris from existing channels that contain rearing salmon. Expecting fish to move out of the way as stated on page 59 is inadequate. Fish removal should be required prior to disturbing water bodies containing fish."

Several BMPs and conservation measures are identified, including fish removal (exclusion) if needed, on Pages 59-60 of the NEPA EA to avoid and minimize impacts. Two of the conservation measures from Page 60 are included below:

- In-water work would be conducted during the prescribed work window conditioned in the issued HPA. This is anticipated to be during the "Times When Spawning or Incubating Salmonids are Least Likely to Be Within Washington Fresh Waters" which is August 1-August 31.
- All reasonable and prudent measures would be taken to ensure fish are excluded in compliance with the WSDOT Fish Exclusion Protocols and Standards (2012).

A more complete discussion of measures to avoid and minimize impacts to fish are included in the Biological Opinions prepared by the U.S. Fish and Wildlife Service and NOAA-National Marine Fisheries Service. (included on the disk provided in Appendix 5 in this FONSI).

"Comment 6. Large Woody Debris is proposed to be installed in an area that will receive rock protection in the river. The effectiveness of the wood depends on the designs, details not included in the EA."

The location of large woody debris and its proximity to rock revetment protection will be determined during final design. Its location within the side channel was proposed as a way to promote more natural stream processes in combination with the riparian restoration planting and establish more natural conditions in the former roadway alignment once roadway relocation is completed. More detailed designs will be developed as part of the final design and included in future regulatory permit submittals including the HPA and Army Corps of Engineers Section 404 permit.

"Comment 7. Depending on existing conditions in the adjacent channels, the addition of large woody debris should be added to the project designs."

Large Woody Debris is addressed in the NEPA EA, as noted on page 16 of the NEPA EA:

"Once the decommissioned roadway is removed, soil decompaction and placement of organic materials, including forest duff salvaged during clearing and grading, would prepare the site for restoration where planting is feasible. This riparian buffer mitigation would restore a forested riparian corridor adjacent to the North Fork Skykomish River. Where planting is not feasible, natural stream channel conditions would be restored with the asphalt removal. Large Woody Debris would potentially be placed near the upstream inlet to the side channel to enhance in-stream habitat and would be placed within restoration areas to enhance wildlife habitat."

And on Page 60:

"Large Woody Debris (LWD) would be installed to provide in-stream habitat for listed fish and buried rock to place with LWD to "soften" the interaction of the rock protection with the river if the river migrates into the embankment."

"Comment 8. The EA mentions mitigating for wetland impacts and buffer impacts. However it is unclear where and how that mitigation will be accomplished. Approximately 1 acre of riparian buffer will be created in the old roadway, but is that enough? The EA documents Permanent impacts to wetlands would be mitigated offsite at an approved mitigation bank. The NEPA addresses wetland mitigation on Page 77: "Compensatory wetland mitigation would be used for unavoidable fill impacts and would ensure that there are no-net loss of wetlands. The wetland mitigation would likely occur at an offsite location, at an approved wetland mitigation bank. An approved wetland mitigation bank has been...

7-6
The permanent impacts at 950 square feet. I did not see in the EA how these impacts will be mitigated.

Mitigation for buffer impacts would occur both onsite and offsite at the mitigation bank as required by regulatory review requirements. The proposed mitigation would comply with Washington Department of Ecology and United States Army Corps of Engineers guidelines, applicable U.S. Forest Service requirements, and Snohomish County Critical Areas Regulations.

It is expected that this mitigation bank would also be used for permanent riparian buffer impacts.

The Tulalip Tribes depend upon salmon and shellfish for economic and cultural sustainability. The proposed project if not planned, designed and constructed properly, can result in continued losses of resources the Tribes depend upon. As salmon disappear, tribal culture, communities and economies disappear. The Tulalip Tribes are in favor of removing most of the road out of the floodplain as proposed, but remain concerned with the construction designs and mitigation for project impacts and wish to be consulted on the project designs.

The project team will coordinate with the Tulalip Tribes to arrange for consultation opportunities during the final design process. It is anticipated that consultation would include an onsite meeting, distribution of plans and request for comments during the 60 percent and 90 percent design review stages, and other consultation measures as identified during the consultation process.

Thank you for your comments.

This project has gone on far longer and escalated in cost far beyond what seemed possible ten years ago when a storm moved the North Fork Skykomish river to an area once occupied by the North Fork road. ALPS strongly supports responsible recreational use of National Forest lands in general and such use in the North Fork Skykomish in particular, for utilization of both Wilderness and non-Wilderness opportunities. We understand and support the need for "access" to National Forest lands, especially those areas so close to the metropolitan areas of greater Seattle. ALPS supports maintaining some sort of way to drive into the upper North Fork Skykomish valley, to the trailheads accessing Quartz Creek and Cady Ridge. However, we question whether this project, as presented, represents the optimum route to achieve that goal. The sheer cost of it, when there are so many other roads in Snohomish County in need of attention, makes us wonder if it is a best use of limited funds.

The project has taken cost considerations into account as part of project development both through its selection of design standards that have helped to reduce the project footprint and a commitment to implement Practical Design efforts as part of the final design process. See Response to 4 above.

"Even with the substantial costs of this project, there is certainly no guarantee that other vulnerable segments of the Index-Galena road will survive future weather events. Despite the breathtaking pricetag, we believe that corners are being cut. No kind of adequate provision is being made to deal with runoff from the new road. Retaining walls are proposed to be anchored by drilling into toeslope hillsides where there is a worrisome chance that a pressurized aquifer might be punctured, which could unleash mud and debris into the North Fork and heavily damage the reconstructed road segment. Apparently there are no plans to adequately investigate whether that might be the case."

There are no confined pressurized aquifers in the project area. The project team has conducted extensive geotechnical investigations, including subsurface borings. Existing groundwater conditions are discussed briefly in the NEPA EA and in the Geology, Soils, and Groundwater Report found in the Technical Appendices. On page 45 the NEPA EA states: "Shallow, unconfined groundwater occurs within the alluvium and colluvium deposits that overlie the bedrock in the project area. Groundwater levels range from about 5 and 15 feet below ground surface (bgs) in the alluvium, and between about 5 and 50 feet bgs in the colluvium. Groundwater also occurs within fractures in the underlying bedrock. Groundwater levels in the bedrock range between about 25 and 50 feet bgs in the project area. Groundwater level measurements in the project area indicate"
seasonal groundwater level fluctuations of about 10 to 15 feet in the alluvium, colluvium, and bedrock. It is estimated that the shape of the groundwater table generally follows the topography, and that groundwater flows from southeast to northwest in the project area as water drains toward the river and streams. On Page 30 the Geology, Soils, and Groundwater Report states that:

"Permanent subsurface drainage may be installed where groundwater contributes to the potential instability."

Water quality construction related impacts and measures to address them are addressed in multiple sections of the NEPA EA: In the Geology and Soils section, construction best management practices (BMPs) and permanent drainage design are discussed on page 43; in the Water Quality and Surface Water section on pages 53-56; and in the Fish, Wildlife and Vegetation section on pages 59-60. The NEPA EA text identifies that the project would develop a Stormwater Pollution Prevention Plan (SWPPP), and best management practices (BMPs) would be implemented to minimize the impacts of construction activities. A Certified Erosion and Sedimentation Control Lead (CESCL) would be onsite during construction to ensure that BMPs installed on the project site are appropriately maintaining acceptable levels of project discharge, in accordance with the rules and regulations set forth by the Department Of Ecology. Snohomish County would be responsible for onsite inspection.

ALPS believes that both Snohomish County and the Forest Service need to take a step back and look at the broader question: what is the least cost (financial and environmental), lowest exposure to future storm damage, and best way to provide recreational access to the upper North Fork valley? As you know, there is another way into the upper North Fork, up the Beckler River and over Jack Pass. ALPS believes it would be far better to conduct a study of which route into the upper North Fork is optimum, and least exposed to storm damage over the long run. There are so many problematic and precarious stretches of the North Fork road that it is unwise to simply "fix" this one when there is such a high likelihood of failures in other places. Snohomish County should look at access to the entire area, as a whole. The road's long term viability needs to be assessed along its entire length. This could best be done by some independent entity, not by county staff. The Index-Galena route's viability needs to be weighed against the alternative Beckler route. The Beckler route is located a bit farther east where there may be at least some rain-shadowing effect from the greater extent of mountains to the west. It is just possible that it may be slightly less subject to full force of storms sweeping in from the west. Forests there are a bit drier and more open than those farther west where this project in question is located.

Beckler River Road is not maintained and operated by Snohomish County. The Beckler River Road (aka Forest Road 65) is maintained and operated by the US Forest Service, and extensive portions of the roadway are located in King County, outside of Snohomish County jurisdiction. Restoring roadway access on Index-Galena Road is consistent with the project purpose and need as discussed in the NEPA EA. The project purpose is provided on Page 1 of the NEPA EA: "The purpose of the Index-Galena Road Milepost 6.4-6.9 project is to restore essential travel. Essential travel includes re-establishing access for property owners with land holdings in the North Fork Skykomish River valley upstream from the town of Index, re-establishing vehicular access for emergency service providers to these properties, re-establishing public recreational access to the North Fork Skykomish River valley, and re-establishing administrative access for the U.S. Forest Service to manage their lands located in the Mt. Baker Snoqualmie National Forest."

The need for the project is discussed in Section 1.7 on Pages 4 and 7:

1.7 Why is the project needed?

The following factors have been identified that contribute to the need for road repair and relocating the damaged road out of the floodplain:

- Index-Galena Road is a direct and vital transportation link to the upper North Fork Skykomish River area, both for National Forest administrative and public recreational access. Forest recreationists and recreational property owners who live west of Index now must drive approximately 42.5 miles (10.5 miles on gravel road) to reach the Galena area at the Silver Creek/North Fork Skykomish confluence, via US 2 and the Beckler River Road (Forest Road 65) over Jack Pass and several miles of gravel road.
- The project is consistent with the purposes of the Index-Galena Road and is part of the larger Index-Galena Road Improvement Project, which is a key component of the National Forest's long-term management plan for the North Fork Skykomish River area.
- The project will improve public safety and reduce the risk of future flooding by relocating the road out of the floodplain, reducing the risk of future road failures, and improving access to the Upper North Fork Skykomish River valley.
- The project will improve the ability of emergency service providers to access properties along the North Fork Skykomish River in the event of an emergency, such as a flood or other natural disaster.
- The project will improve public recreational access to the North Fork Skykomish River valley, allowing for greater enjoyment of the natural beauty of the area and supporting local economy.
No kind of broader analysis like this has been done, to our knowledge. If an impartial analysis concludes that the Beckler offers a more viable route to the upper North Fork over the long-term, that is where resources should go. However, we can't help but wonder if the impetus to expend substantial resources on this one segment of the North Fork road is driven by the handful of cabin owners at Galena so as to more easily access their properties. If so, it is a horrible misallocation of scarce public funds which might be far better spent to benefit more people. Property owners at Galena ought to have known when they purchased their lands that motorized access was not be guaranteed by the taxpayers to access their land located so deep into the mountains.

To sum up, ALPS believes it would be a mistake to simply focus on this one small piece of road when there are broader questions that need to be answered first. It would be a mistake to throw so much money at this one small stretch of road. Snohomish County and the Forest Service both need to step back, ask what the real goal here is, and how best can it be achieved.

Thank you for considering these comments.

Pass. Aside from the inconvenience and additional fuel consumption and emissions, this extended detour presents a safety risk to the public due to the increased drive time exposure and potential hazards of traffic and road conditions.

- Forest Road 65 over Jack Pass is a single-lane gravel road with turnouts, and has steep mountain grades and switchbacks. Although the U.S. Forest Service appreciates that Snohomish County Public Works has partnered with the U.S. Forest Service to perform road maintenance to address additional wear and tear, this road is not designed to safely accommodate increased vehicular traffic that was displaced from Index-Galena Road. This access route provides additional challenges for transport of RVs and horse trailers to the upper North Fork Skykomish valley.

- The U.S. Forest Service’s Troublesome Creek and San Juan Creek campgrounds cannot be fully utilized by campers who drive motor homes or pull trailers, due to the inconvenience and hazard of driving the steep narrow grade over Jack Pass.

- The U.S. Forest Service’s timber sale planning and administration is hampered due to adverse conditions for hauling logs over Jack Pass from the North Fork Skykomish drainage. Recent planned timber harvest units and timber sales were dropped because of poor access. In addition, watershed restoration projects, and road maintenance or decommissioning contracts are more expensive to implement due to the detour.

- Since the washout, response times have increased for emergency services, such as vehicle accidents, search and rescues, and fire suppression, due to the long detour.

Reestablishing the connectivity of the Index-Galena Road is important for providing an alternate access route into the North Fork Skykomish and upper Beckler River watersheds in case a major flood event were to wash out the Beckler River Road.

Thank you for your comments.

The City of Sultan would like to submit this letter of support to continue with the project to restore the Index-Galena Road as soon as possible.

The Sky Valley economy is primarily based on tourism and especially, outdoor recreation. We have formed a group called the Sky Valley Recreation Planning Group. It is open to anyone who would like to attend but its main purpose is to bring all of the public land managers together every other month to report on their activities and plans. The Sky Valley has an unusually high percentage of public lands and their management directly impacts the health and wellbeing of the entire area. Representatives include: US Forest Service, State Parks, Dept. of Natural Resources, Fish and Wildlife, County Parks, elected officials from Congresswoman Del Bene, Senator Pearson, all of the cities and towns in the Sky Valley. It also includes special interest groups like...
We agree with the proposed environmental assessment that the project will have many positive benefits including restoration of roadway connectivity, relocation of the road out of the 100-year floodplain and channel migration zone, and a footprint that will minimize vegetation clearing and land disturbance. We agree that this project will enhance the free-flowing condition of the North Fork Skykomish River and enhance river values that include scenic, water-quality, wildlife habitat and hydrological functions.
recreation, fish, and wildlife that collectively make the river suitable for Wild and Scenic River designation. The Forest Service Handbook provides management guidelines that must be used when carrying out projects and activities.

The preferred alternative that will reroute the road from milepost 6.4 to 6.9 is consistent with guidance for projects along a suitable Wild and Scenic river. Specifically, moving the road corridor out of the floodplain and channel migration zone will enhance the freeflowing character of the river. It will protect and enhance outstandingly remarkable values by enhancing the scenic experience from the river, restoring recreational access, protecting fishery values by removing a segment of road out of the floodplain, and protecting the river-dependent wildlife values by restoring floodplain habitat along the alignment of the old road. The project will have an impact on terrestrial resources but the opportunity to protect and enhance the river-dependent values is significant. This segment is along a section of the river identified for recreation classification and as stated in the Forest Service Handbook, "new roads and railroads are permitted to parallel the river if such construction fully protects river values (including river’s freeflowing character)." We believe the project as proposed will meet this standard. The project will also be consistent with the State Scenic Waterway designation and by moving the road out of the channel migration zone it will "protect and preserve the natural character of [the] river;" by allowing the river to more freely migrate within the floodplain it will serve to preserve the river in "as natural a condition as practical." Comments noted.

We support the application of a design standard for a Very Low Volume Roadway with 22’ pavement width and a 35 mph design speed. This design fits the natural forest environment. While clear zones are not specified, we assume from Exhibits 43 and 44 illustrating Before/After Visual simulation that clear zones will be minimal to protect the scenic character of the road corridor. The road would be posted for 35 mph but based on a 40 mph design speed. A Practical Design effort would be undertaken during final design to determine if there are other design measures that can reduce project impacts and costs. These measures could include alignment refinements and other design changes that can reduce project impacts and costs.

We support the Preliminary River Access Plan and Conceptual Design presented as Appendix G. This access point at milepost 6.9 was used as a take-out prior to the road washout. We request that the Final Environmental Assessment explicitly classifies this site for management as a day-use area so that it remains accessible for river access. The site is not appropriate for overnight use; public and private campgrounds are available for overnight use in close proximity. The classification of the river access site is not part of the proposed project and will not be included in the FONSI. The U.S. Forest Service presently manages the area shown in the preliminary river access plan as a dispersed recreation area. It is recommended that you contact the Skykomish Ranger District with regard to this matter.

"Thank you again for the opportunity to provide comments on this project. We fully support the preferred alternative in the Environmental Assessment. We look forward to enjoying restored access to this river that has historically provided one of the most highly valued whitewater recreation opportunities in the state. Comments noted.

Thank you for your comments."
The project is essential to providing access to the Wild Sky Area. It is essential to providing access to the Wild Sky Area—homes, campsites, hiking—everything has been denied to visitors and residents alike. Outdoor recreation is the basis of our economy in the Sky Valley.

Comments noted. Thank you for your comments.
Comments noted. Thank you for your comments.

I think you are correct. The total width of the bridge in question is 25 feet. The road was washed out from Milepost 6.4 to Milepost 6.9. Many culverts were damaged with the washout but no bridges were washed out. Complex regulatory compliance requirements and a challenging environment for roadway design and construction have contributed to the longer than anticipated timeline. Thank you for your comments.

Comments noted. Thank you for your comments.

I do not understand why it is taking 12 years to repair this road. The I-5 bridge came down a few years ago and it was replaced in no time. I realize that it is more important than this project but 12 years is excessive. If there were a million board feet of timber to remove the road would be open. If PUD had opened their drilling operation the road would be open. Let’s stop fooling around and get this project finished for the public who own it. Thank you.

Comments noted. Thank you for your comments.

The road was washed out from Milepost 6.4 to Milepost 6.9. Many culverts were damaged with the washout but no bridges were washed out. Complex regulatory compliance requirements and a challenging environment for roadway design and construction have contributed to the longer than anticipated timeline. Thank you for your comments.

Comments noted. Thank you for your comments.

The North Fork of the Skykomish River is home to some of the greatest recreational whitewater boating in the state. I am here to represent the whitewater community in hopes that someday our access to the North Fork will be enabled through the completion of this project.

Comments noted. Thank you for your comments.

Fix the road ASAP – Snohomish County needs to do much better maintenance on Beckler River Road until Index-Galena Road is fixed.

Beckler River Road is not maintained and operated by Snohomish County. The Beckler River Road (aka Forest Road 65) is maintained and operated by the US Forest Service, and extensive portions of the roadway are located in King County, outside of Snohomish County jurisdiction.

Thank you for your comments.

Very much looking forward to the completion of this project. As a resident living on Index-Galena Rd. I know the impacts on the region will increase due to ease of access, but think the access is worth the cost.

Comments noted. Thank you for your comments.

Comments noted. Thank you for your comments.

I am a Corson and own the property along the washout 6.0-6.6. I would like to have HEPA for the protection of my properties (sic) banks along the river.

Comments noted. With regard to protection of your property, it is recommended that you talk with the Washington Department of Fish and Wildlife to determine regulatory requirements for protection of your property. The project would only be obtaining permits for the proposed project. Thank you for your comments.

Thank you for your comments.

We survived the recession and should be thriving again. We need this fixed! We were told this project would be done in 2015. Nothing. 14 years to complete this has been a long time to wait. Please do what can be done as quickly as possible. Thank you!

Comments noted. Thank you for your comments.

I would like to see this expedited – the bridge has been washed out for many years, but because we didn’t complain, it was pushed to the back burner even though it was promised to be repaired years ago – we are feeling ignored.

The road was washed out from Milepost 6.4 to Milepost 6.9. Many culverts were damaged with the washout but no bridges were washed out. Complex regulatory compliance requirements and a challenging environment for roadway design and construction have contributed to the longer than anticipated timeline. Thank you for your comments.
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<td>1</td>
<td>David Coesens</td>
<td>&quot;Cub Scout Leader. We use the area for scouting.&quot;</td>
<td>Comments noted. Thank you for your comments.</td>
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<tr>
<td>2</td>
<td>Kristin Kosiewicz</td>
<td>&quot;What is the expected start of the rebuild and expected finish date?&quot;</td>
<td>The estimated project schedule is discussed on Pages 17 and 18 of the NEPA EA and says: Construction could begin as early as 2018 if construction funds become available, and the right-of-way easement is approved, and all permits and approvals are obtained. It is estimated that construction would require a minimum of two construction seasons and could extend to three seasons depending on construction sequencing.</td>
</tr>
<tr>
<td>3</td>
<td>Unsigned</td>
<td>&quot;I miss having the Index-Galena Road open because it is a great bicycle route and a great camping area.&quot;</td>
<td>Comments noted. Thank you for your comments.</td>
</tr>
<tr>
<td>4</td>
<td>Edwin James</td>
<td>&quot;Another 4 years is ludicrous. When 4 years is over What will be the next excuse? In 2007 we were promised 5 to 10 years. This is causing our family undue hardship. Because of the 42.5 mile detour one way we cannot get firewood delivered. Since wood is our only source of heat. Being in our 70's we cannot cut our own wood. We deserve to have safe traveling on the &quot;detour&quot;. Also General maintenance like striping, trimming, cleaning of the culverts (we noticed it took two days for the county to find the culverts and mark them) and snow removal. Where has the money gone for the road maintenance? Where are the county records on this. I noticed a lot of the NEPA EA report is repeated.&quot;</td>
<td>Comments noted. Thank you for your comments.</td>
</tr>
<tr>
<td>5</td>
<td>Phil Kincaire</td>
<td>&quot;Thank you Crilly, for your continued efforts on this complex project. Thank you also for considering the interests of recreational users of the North Fork Skykomish River. As you know, County planners as far back as at least 1980 recognized the importance of river access to upriver communities. The section of river near Index-Galena Road milepost 6.9 is one of the few areas of relatively low bank easily accessible from this road on public land below Troublesome Creek. This site was mapped in the State's Scenic River Plan of 1990. The North Fork Skykomish was rated as one of the most popular boating river and whitewater resource in American Rivers' 2005 survey of river users. Please feel free to contact me or the County Forest Manager at 250-382-4850.&quot;</td>
<td>Comments noted. Thank you for your comments.</td>
</tr>
</tbody>
</table>
Members of different organizations such as the Washington Trails Association and American Whitewater, that were on the NEPA EA distribution list. These organizations have been involved since the NEPA Scoping stage of the environmental review process. There were 465 e-mails submitted and received during the comment period. Of this total, approximately 451 were characterized as having a similar coordinated response which used a template. The template was used to express support for the project and concurrence with findings of the NEPA EA. Due to the large volume of comments and their similar content, the general template is provided below to characterize the nature of the comments:

"I am writing to voice my strong support for repairs to the Index-Galena Road at milepost 6.4-6.9 in Index, Washington. The Index-Galena Road is a vital transportation link to the upper North Fork Skykomish River area. The proposed repairs will restore access for hiking and other recreational activities along the North Fork Skykomish River by rebuilding a section of road that has been impassable for over a decade."

"The current 42.5 mile detour up the Beckler River Road and over Jack’s Pass is an inconvenience to hikers interested in accessing popular trails like West Cady Ridge, Quartz Creek, North Fork Skykomish and many others. The detour is also a safety risk for travelers."

"I agree with the analysis in the Environmental Assessment that the project will have many positive benefits including restoration of roadway connectivity, relocation of the road out of the 100 year floodplain and channel migration zone, and a footprint that will minimize vegetation clearing and land disturbance."

"This project will also be a huge gain for the river’s scenic values, recreation, fish, and wildlife that collectively make the river suitable for Wild and Scenic River designation."

"I support the Preliminary River Access Plan and Conceptual Design presented as Appendix G."

"Thank you for the opportunity to provide comment on this important project."

Due to the large volume of e-mails received during the comment period, they have been copied to a disk provided with this FONSI. Comments noted. Thank you for your comments.
These organizations have been involved since the NEPA Scoping stage of the environmental review process. "On a personal note, as a WA hiker with 40 years of hiking experience in the Northwest, I'd like to note that the area served by this road is an absolute gem, of exceptional scenic value, and it provides the ability for outdoor adventurers to get a true wilderness experience close to home. Please do support the road repairs for this area." 

"In addition to the above, I also am a kayaker and the north fork of the Skykomish is one of the best runs in the state of Washington. Because of the washout, it has been many years since my friends and I have gotten to enjoy that run. I also know that many people including myself love the hike to Blanca Lake, and having to do the detour to Skykomish and the Beckler River Road greatly adds to the distance and difficulty of getting to the trailhead for that hike." 

"I am a Pacific Crest Trail section hiker, doing several hundred miles per summer. In Section K (Stevens to Rainy Passes), there are very few ways to exit the trail in case of emergency. West Cady Ridge is, theoretically, one of those bailout points. Being able to access this trail is critical for safety, in times of wildfire or weather emergencies. I strongly support the repair of the Index-Galena Road, to help keep my fellow hikers safe." "I first used the Index-Galena Road 34 years ago to hike to Lake Blanca during a car-camping trip at Troublesome Creek Campground. I have wistfully dreamed of repeating this adventure while I'm still able. Thank-you for taking the time and energy to make this happen." 

"Below is the template, but before that I just want to note that trail access is something that's important to me. Having more options for backcountry travel both open more opportunities and alleviates some of the pressure on more popular destinations." 

"For nearby residents, reopening this road would increase economic activity in the Town of Index as a gateway to this recreational area. It will also provide additional access and egress options for residents of Index and adjacent communities in the event of flooding, fire, landslides or washouts blocking other portions of the limited road network in the area." 

"I am a retired person who spends a lot of time hiking and volunteering in our National Forests. This year alone I have spent 40 days working to reduce invasive weed infestations in the Middle Fork Snoqualmie Valley. I have visited the Index-Galena and Beckler areas many times and was thrilled when the Wild Sky Wilderness area included parts of this spectacular terrain. It would be a shame to continue hindering access to many of the current and proposed trails in this area, as well as other recreational resources."
Many years of close observation has demonstrated to me that low elevation forests in western Washington have remarkable abilities to recover quickly from disturbance, whether natural or from human activities (including brutal logging practices and fires). The value that visitors reap from being able to visit this area will vastly outweigh the damage from the rare individuals that do not treat our public lands with respect. Reasonable access will help build a constituency that supports preserving lands like this for many generations in the future.

Regarding repairs to the Index-Galena Road at milepost 6.4-6.9 in Index, Washington. The Washington Trails Association is right to emphasize the value of increased access to hiking, fishing, recreation and so on. I'd add that the region, county, state, and local burgs all benefit from outdoors enthusiasts in immediate economic activity. In addition, the greatest draws to the region are our booming economy, and our world-class recreational opportunities, like those accessed by this roadwork.

As a Backcountry Wilderness Ranger Volunteer for the US Forest Service, I know that providing additional access to trails away from the I-90 corridor will help to ease the amount of traffic in that area.

As a member of Washington Trails Association, Seattle Mountaineers, and Mountain Rescue, I am writing to voice my strong support for repairs to the Index-Galena Road at milepost 6.4-6.9 in Index, Washington. I've driven the 42.5 mile detour to work rescue missions in the valley and believe it contributed to delayed response as well as a reduced response among rescuers. I've also wanted to hike other trails in the upper North Fork Skykomish River, but have been flummoxed by that long drive up the Beckler River Road over Jack's Pass. I believe it will also contribute to tourism in Index itself. Index has likely suffered from less traffic over the last decade.

As our population expands, it is even more important to provide more trails so the trails we have now don't get "loved to death." Outdoor recreation yields many benefits, including money spent in smaller towns and improved health and well being.

The current 42.5 mile detour up the Beckler River Road and over Jack's Pass is a safety risk, an inconvenience to hikers wishing to access popular trails like West Cady Ridge, Quartz Creek, North Fork Skykomish and many others, and contributes to increased auto emissions in the area. Also, when major hiking areas cannot be easily reached, the result is overuse of more readily accessible trails. This crowds trailhead parking lots, detracts from the wilderness experience, and increases the likelihood of trail erosion.
Perhaps we (sic) selfish, but creating better access and trails north of our Edmonds home is a win‐win to us. Traveling through Seattle is so difficult that any better access north of us is where we prefer to be.

"The Index‐Galena Road is not only a vital transportation link to the upper North Fork Skykomish River area, but it is a critical factor in the region's economic recovery."

"I have enjoyed many recreational opportunities on this trail in the past 30 years when the road was open, I can speak directly to the unique resources that will be accessible once the current 42.5 mile detour up the Beckler River Road and over Jack's Pass is not required."

"This would be a huge asset for seniors like my husband and I. We don't like to travel great distances."

"I would love to see the road permanently removed from use and put back to its natural state."

"I have hiked to this trail many times and have found it to be one of the most beautiful areas in the state."

"The money should be diverted to trail maintenance/expansion in the Wild Sky wilderness."
Alex A. Taub

"My parents own the last legal cabin on the Index-Galina road. I will not be able to appear at the hearing on Wednesday, but would like to offer my support for getting this project underway. My mother wants to be able to enjoy her cabin again without having to drive all the way around Beckler River Road over Jack's Pass. This is a very emotional and important thing for her. She just lost Dad, whose name was Jack and having to go over this pass is just a reminder of her loss."

Comments noted. Thank you for your comments.

Dace Campbell

"I'm a property owner of two recreational lots and a cabin in "Skyko 4" upstream from the proposed repair of the Index-Galena Road. I've received notice of the upcoming Open House and Public Hearing. Can you please advise of the purpose/agenda for that open house event? Is it primarily to solicit public review and comment for the NEPA Environmental Assessment? I ask, because unfortunately will not likely be able to attend in person, but I have read through the NEPA Environmental Assessment available online, and would like to comment here if that is acceptable."

"My comments are as follows:

1. Thank you for moving forward with this project, and for providing this information for review. It is thorough and easy to understand.
2. I fully support this project.
3. Please EXPEDITE and ACCELERATE this project wherever possible. We homeowners affected by the road closure since 2006 were originally advised that the project was to be complete by 2015. Then it was delayed, and delayed again. We were most recently advised that construction would start in spring 2018, lasting two years and completing end of 2019. The project now describes an anticipated construction schedule of three construction seasons, meaning completion at end of summer or fall of 2020. That makes the original "9-year" project actually a 14-year project, DELAYED BY MORE THAN 50% over the original project schedule. And, while our homes and properties have fallen into disrepair in the last decade, barely maintained at great expense, it means that access will only be restored at least four years from now. All for repairing/replacing a half mile of an existing two-lane road!
4. 3) What, if anything, can we residents and property owners directly affected by this flood a decade ago to help the county expedite this project and bring it to completion sooner than 2020?"

Thank you for your time and attention.

Comments noted. Thank you for your comments.
For 16 years, 10 years past the flood damage, I have been a property owner on Index-Galena Road at Skyko 3. With my family of five, I am also a regular recreational user of the surrounding area. I am retired and approximately a half-time resident here, year-round, all-weather, and commute on foot over the four miles from the Index side of the destroyed road when necessary. I say “necessary” because without occupancy, our properties degrade and invite crime in a way that is not in the best interest of anyone here, including recreational users. The Index-Galena Road is a lifeline to this area. Restoring it is essential. It was here before the flood and should be rightfully restored. Over the long term, there can be no environmental consequence of repairing this road that has not been previously established over its decades of historical presence. Restoring it has more potential to benefit the local environment than to degrade it. Comments noted.

Access, safety and security:

This road offers the best and most reasonable access to the Wild Sky Wilderness. Alternate routes are problematic — not reliable, not well maintained and less likely to be used. Undertaken before the flood, Wild Sky was enacted for its protection and with the promise of public access. With difficult to non-existent vehicular access, there is currently very little recreational activity in the Wild Sky Wilderness. Support for the environment originates from public awareness of the environment. Public awareness of the environment results from public access to it. Those who conceived, advocated for and supported the enactment of Wild Sky have done so under circumstances that are no longer valid. It makes me wonder if Wild Sky would even exist today if it had not already had its full momentum at the time of this flood damage to its primary and expected means of access.

It is my understanding that restrictions apply to intervention with fires and other threats to the wilderness that are of natural cause. There are many isolated private properties surrounded by this wilderness. It may be uniquely threatened in that way by our non-existent access to emergency services. While there may be no cause for public concern about a fire on private property here, there should be some concern about how it can spread to the surrounding wilderness if it cannot be immediately contained. I have been involved in reporting and helping to contain three such incidents over the last 10 years that might have otherwise burned out of control into the surrounding wilderness. Reasonable access for occupancy can account for an early discovery that will prevent this, and for a much improved response time by fire crews and equipment. There were significant delays in all of these cases while we did what we could with pumps and buckets. In one case, fire dept. volunteers hiked in with all the firefighting gear they could carry, which was not very much. I once drove a medical emergency out of here to meet an incoming ambulance on the other side of town. Comments noted.

It is also noted that vehicular access for emergency services providers is included in the purpose statement for the project as identified on Page 1 of the NEPA EA, and was identified as one of the needs for the project on Page 7 of the NEPA EA:

Since the washout, response times have increased for emergency services, such as vehicle accidents, search and rescues, and fire suppression, due to the long detour.
The patient survived, but might not have except for having been found by recreational users who are scarce here under the present circumstances. I know of families who have refrained from bringing their young children here because of the safety implications. Others come with no apparent regard for the risk, and that may be where the real danger is.

Materials and suppliers: Using, maintaining and protecting private properties, as well as public resources, requires improved, year-round access for transporting materials and supplies. One example is the delivery of our heating fuel (propane). We have long been at risk for loss of this service. Without it, the usability, condition and value of our properties that depend on it will further degrade. Loss of this safe and conventional heat source would invite more consumption of local firewood, which can be detrimental to the environment due to wood harvesting and an increased risk of fire. We experienced the loss of our primary fuel vendor once after the flood because of travel time, cost and risk, and had to find another. Our current provider remains willing on the basis of the "imminent" restoration of reasonable transportation conditions.

Comments noted.

Is there another way in (or out)? Typically not— from October/November through May—more than half the year. At any given time during the smaller half, there is a high risk of loss of effective use due to fallen trees and other hazards. It is important not to reduce this concern to a temporary loss of access for recreational use. Families can become stranded here unknowingly with no possibility of an exit to emergency services, and usually with no means of communication. There is no cell service here until you drive (or hike) well beyond the areas most threatened by the possibility of a road blockage. What about maintaining the alternate route? Eventually, you'll have spent all the same money and that is not to provide 100% assurance of access. There will be times that it cannot be done at any reasonable cost, and within a reasonable period of time. Even paving that road would be of little help. The bumps in it are annoying, but they do not keep us in or out. We lose that route multiple times each year and for months on end. We lost the primary route once in a hundred year flood. It makes far more sense to fix it, even financially, than to "improve" the alternate route.

Comments noted.

Crime and law enforcement: The lawless are attracted to this. We see it all the time. Related is our poor situation for securing an emergency response. Knowing this, they will continue to victimize private properties and the environment. We've seen the effects, and so have we.

Comments noted.

Transportation constraints: When on the road, the "imminent restoration of reasonable cost and access" is made tosound more like an official promise, but the mountainous region's topography, road conditions and weather often make it impossible to maintain a year-round access. The occasional water "in the middle of the road" cannot be moved, even if it were desirable, as it is often due to natural elements that cannot be controlled. The loss of this service requires the alternate route to be made possible, even if it means the inconvenience of an extra mile. This is a crucial part of the region's economy, and the need for access is essential to the survival of the properties as well as the region.

Comments noted.

Real danger? I see no change in the immediate and potential dangers to the area, and that may be where the real danger is.

Comments noted.
have seen occupancy decline steadily over the years since the flood. That trend will continue, and more crime will follow. This is not beneficial to the environment or to the prospect of safe recreational use by families which are willing to cope with, or may sometimes even favor the difficult access. Open this environment so it can once again become popular with responsible occupants and recreational users, and the environment will win. The corridor of this valley that is served by the road, and even the river itself, are not within the protected wilderness. A hundred or more isolated dwellings here may be at risk for becoming detrimental to the quality of the adjacent wilderness. There are hundreds of "free" unimproved campsites, and plenty of trash gets left behind. There is little presence of game enforcement to deter unlawful harm to fish and wildlife meant to be protected by environmental law which has so delayed fixing this road.

Hwy 2 bypass: 

"If a catastrophic event causes a closure of Hwy 2 between Index and Skykomish, this 13‐mile section can be successfully bypassed on a 30 mile loop that is Index‐Galena Road (restored by this project), FS 65 and the Beckler Road. All but eight miles of this are paved. Similar routes are available over most (if not all) of Hwy 2 from Index to Monroe, making this one crucial to extend that option to within 15 miles of Stevens Pass. Beginning four miles beyond the pass, similar alternate routes resume to Leavenworth and beyond. It is significant that with all such routes intact, any of the many homes and services, or potentially stranded vehicles, along the final ascent to Stevens Pass can be reached by emergency services from within 15 miles (or less) of a point that can be driven to on alternate/emergency routes.

Summary

"I am in favor of an environmentally responsible process for restoring this road to its rightful, normal use. All relevant environmental concerns have been comprehensively addressed by the environmental assessment. This is not new development. The environment here is now in decline – resulting from reduced access, reduced awareness, reduced occupancy and recreational use, reduced presence of law enforcement, no reasonable access to emergency services, etc. If continued study reveals unavoidable environmental consequences of the project, any necessary exception should be granted so that construction can begin. Long term benefits to the environment resulting from restoring the road will significantly outweigh any environmental consequence of construction or the future presence of a functional road."

Comments noted. Thank you for your comments.

457  E  Mary C Clack‐Waltz

"I am also Co‐signing Bruce Kimball's letter below. Our family has owned property in Skyko 3 for over 40 years. We used the cabin Comments noted."
throughout the year for skiing, hiking and kayaking and simply relaxing. We have seen the road impacted before but the response was reasonable and timely. I agree with Bruce and hope this note is not too late to be considered. I also talked to the court reporter at the meeting.

I think the environmental impact studies are comprehensive and agree to proceed.”

Thank you for your comments.

458 E Henry Sladek, Owner/operator Cascadia Inn Skykomish

“I am writing to support the rebuild/replacement of the Index-Galena Road in East Snohomish County. I’m not sure what stage this study or project is in but I know it’s been quite some time for this project to get moving. Although I live and operate a lodging/hospitality business a bit further east, in Skykomish (King county), we get lots of questions and comments from folks travelling and recreating in the area about when access will be restored. We fully support whatever is needed to get the road replaced.

Please let us know if there’s something else we can do to support this effort.”

Comments noted. Thank you for your comments.

459 E Ann Hedreen

“I have been hiking the Cascades since I was a ten-year-old girl scout. I am now nearing sixty, and it breaks my heart to see that the Index-Galena road has not yet been repaired. The Index-Galena Road is a vital transportation link to the beautiful upper North Fork Skykomish River area. I am writing to voice my strong support for repairs to the Index-Galena Road at milepost 6.4-6.9 in Index, Washington. The proposed repairs will restore access for hiking and other recreational activities along the North Fork Skykomish River by rebuilding a section of road that has been impassable for over a decade. The current 42.5 mile detour up the Beckler River Road and over Jack’s Pass is an inconvenience to hikers interested in accessing popular trails like West Cady Ridge, Quartz Creek, North Fork Skykomish and many others. The detour is also a safety risk for travelers. I agree with the analysis in the Environmental Assessment that the project will have many positive benefits including restoration of roadway connectivity, relocation of the road out of the 100 year floodplain and channel migration zone, and a footprint that will minimize vegetation clearing and land disturbance. This project will also be a huge gain for the river’s scenic values, recreation, fish, and wildlife that collectively make the river suitable for Wild and Scenic River designation. I support the Preliminary River Access Plan and Conceptual Design presented as Appendix G.”

Comments noted. Thank you for your comments.
Thank you for providing your comments.

Comments noted.

Thank you for your support.

Comments noted.

Thank you for raising the issue of the continued Index–Galena road closure.

Comments noted.

Thank you for your comments.
The Index-Galena Road is the main access into the Wild Sky Wilderness area and has been washed out since the flood of 2006. This has cost the Sky Valley in many ways. Outdoor tourism depends on having access, camping opportunities have been lost, lost sales from guests who have gone to other areas, loss of access to personal property and much more. Help us restore this asset to the Sky Valley Outdoor Recreation inventory!

I am one of those people who quit going to the Index area at all. Please get this fixed.

Comments noted. Thank you for your comments.

Toni Reading

"The Index-Galena Road is our main access into the Wild Sky Wilderness area and has been washed out and thus the area inaccessible since 2006. This has cost the Sky Valley region in many ways, including outdoor recreation/tourism that depends on having access. Please fund the necessary construction needed to restore this asset to the Sky Valley Outdoor Recreation inventory!"

Comments noted. Thank you for your comments.

Ken Mahar

"I'm a homeowner in the area, and also a business owner. I'd love to see the Index Galena road reopened for access to recreational use, and as additional tourist draw to the area. Please do everything you can to make this possible."

Comments noted. Thank you for your comments.

Court Reporter Transcript Responses

A copy of the transcript prepared by the Court Reporter is provided as an attachment to the FONSI. Due to the volume of comments, only comments addressing the NEPA EA are addressed in the response matrix. Only one speaker addressed the NEPA EA. The speaker is identified and their comments addressed with responses.

<table>
<thead>
<tr>
<th>Comment</th>
<th>Speaker</th>
<th>Comment</th>
<th>Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>CRT‐1</td>
<td>William Lider</td>
<td>Page 9 – Lines 19‐22 of the Court Reporter transcript</td>
<td>There is no water quality treatment provided per Snohomish County Code or the County's 2016 drainage manual. Use of filter media drains are feasible and can be installed, but have not been shown on the drawings.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>The project’s proposed stormwater drainage is described on page 43, and pages 54‐55 of the NEPA EA. The project proposes stormwater dispersion. As noted in the NEPA EA on page 54, stormwater runoff will be managed in accordance with the Highways Runoff Manual. Below is the citation from the Snohomish County Code that enables use of the Highways Runoff Manual: SCC 30.63A.140 Washington State Department of Transportation Highways Runoff Manual. The Washington State Department of Transportation Highways Runoff Manual, as determined by the Washington State Department of Ecology to be equivalent to the 2014 Department of Ecology Stormwater Management Manual for Western Washington, may be used to meet the requirements of chapters 30.63A and 30.63B SCC for public road construction projects, subject to approval by the applicable director. You can also find applicable text regarding this in the Snohomish County Phase 1 Municipal Stormwater Permit, Appendix 10, Part 2, last modified August 19, 2016.</td>
</tr>
<tr>
<td>CRT‐2</td>
<td>William Lider</td>
<td>Page 9 – Lines 22‐25 and Page 10 – Lines 1‐8</td>
<td>SnoCo still proposes to use dispersion offsite for water quality treatment. This is considered double-dipping. Water quality treatment will not occur on the property and thus not shown on the drawings.</td>
</tr>
<tr>
<td></td>
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<td></td>
<td>The proposed stormwater runoff dispersion will not occur on site. Offsite dispersion was evaluated earlier in the design process but is no longer a part of the project. See pages 54‐55 of the NEPA EA for the discussion of stormwater runoff dispersion.</td>
</tr>
</tbody>
</table>
The water quality treatment trade for dispersion areas is not workable or allowed. The County cannot claim an area for dispersion that is currently receiving runoff from the highway. And if dispersion is used, it must be used on slopes no greater than 15 percent, extending for 100 feet of undisturbed native vegetation, which does not exist in the project area. The County must provide flow control per the County’s NPDES permit and no flow control has been shown on the design.

You can find applicable text regarding use of the Highway Runoff Manual in the Snohomish County Phase 1 Municipal Stormwater Permit, Appendix 10, Part 2, last modified August 19, 2016.

"Twenty-five foot high retaining walls have been added, but have not been adequately discussed in the EA from the aesthetics. And the site impacts, visual impacts, of these walls have not been addressed. The walls will be fast (sic) in place concrete with a major concrete right next to a sensitive river with threatened fish species. The North Fork of the Skykomish is a wild and scenic river and, again, these visual impacts have not been addressed."

The NEPA EA in pages 123-148 provides an extensive discussion of visual quality, including existing project area visual quality, project-related impacts, and identifies proposed mitigation for adverse effects. The project has coordinated extensively with the Mt. Baker Snoqualmie National Forest to ensure that the project design is consistent with its adopted Forest Plan visual quality objectives. To clarify, the North Fork Skykomish River is not a designated Wild and Scenic River as discussed on pages 89-90 of the NEPA EA. It is a recommended Wild and Scenic River with a Recreation designation applicable to the project area. The Forest Plan goal is to protect from degradation the outstanding remarkable values and wild, scenic, and recreation characteristics of recommended rivers and their environment, pending a decision on inclusion into the National Wild and Scenic River System. This allocation is generally applied to National Forest lands .25 mile either side of the main channel of each river that has been recommended for inclusion into the system. The proposed mitigation for visual quality impacts, including structural finishes and aesthetic treatments for retaining walls is discussed in the NEPA EA on pages 135-136.

"The retaining walls will have grilled tie back anchors into the walls – into the rock and there is a risk of blow outs from by confined aquifer and causing a major washout on the road and harming the river and the threatened species. The rock ends will likely require drilling mud to hold the hole open and the use of drilling mud in that area will create a huge muddy mess right next to the river."

Existing groundwater conditions are discussed briefly in the NEPA EA and in the Geology, Soils, and Groundwater Report found in the Technical Appendices. On page 45 the NEPA EA states: "Shallow, unconfined groundwater occurs within the alluvium and colluvium deposits that overlie the bedrock in the project area. Groundwater levels range from between about 5 and 15 feet below ground surface (bgs) in the alluvium, and between about 5 and 50 feet bgs in the colluvium. Groundwater also occurs within fractures in the underlying bedrock. Groundwater levels in the bedrock range between about 25 and 50 feet bgs in the project area. Groundwater level measurements in the project area indicate seasonal groundwater level fluctuations of about 10 to 15 feet in the alluvium, colluvium, and bedrock.

It is estimated that the shape of the groundwater table generally follows the topography, and that groundwater flows from southeast to northwest in the project area as water drains toward the river and streams." On Page 30 the Geology, Soils, and Groundwater Report states that: "Permanent subsurface drainage may be installed where groundwater contributes to the potential instability." An additional mitigation Commitment addressing your concerns with regard to impacts to groundwater exposed during construction has been added to the Preliminary Commitment which was contained in Appendix E of the NEPA EA. The final Commitment list is contained in this FONSI.
A Geotechnical Report will be prepared prior to project advertisement and included in the construction documents and will include geotechnical recommendations.

The EA identifies potential impacts to groundwater and states:

"Groundwater quality could be impacted by construction activities. Groundwater quality could be degraded by spills or inadvertent discharges of chemicals or other potential contaminants during construction. Exposing springs in the new cut slopes could lower groundwater in the immediate vicinity and alter existing subsurface drainage patterns."

As discussed on page 43 of the NEPA EA, adverse effects to geology and soils would be addressed by minimizing effects and would occur through appropriate project design that takes into consideration site conditions. During construction, Best Management Practices (BMPs) would be used to control erosion, control surface water runoff, and employ other construction and operations techniques. BMPs would also include construction staging, barrier berms, filter fabric fences, temporary sediment detention basins, and use of temporary erosion control measures to reduce erosion from areas with fills or excavations. Temporary erosion control measures would be installed prior to any site disturbance.

The final design for retaining walls is not completed yet, but as discussed on page 43 of the NEPA EA:

"Retaining walls may be constructed in areas based on geotechnical recommendations, including structural earth walls (SEWs). The linear extent of these features and location may change during final design based on further analysis of detailed survey, geotechnical, seismic, hydrologic, and hydraulic information and construction considerations."

The EA describes the proposed project’s removal of existing asphalt, concrete, and other debris as described on Page 16 of the NEPA EA. There is no existing funding to remove these materials independent of the project.

Thank you for your comments.
Thank you for joining us at this informational meeting and public hearing for the National Environmental Policy Act (NEPA) Environmental Assessment comment period. County staff is available to discuss the project with you. You may share your formal comments with the court reporter or on this comment card.

What is your interest in the project?

☐ I own property on Index-Galena Road
☐ I am a business owner near Index WA
☐ I live in the area, but not on Index Galena Road
☐ I am a recreational user of the area
☐ Other ____________________________

Please place your comments in the box near the front door, or mail it by October 31 to:
Crilly Ritz
Snohomish County Public Works
3000 Rockefeller Ave., M/S 607
Everett, WA 98201

You may also email comments to:
crilly.ritz@snoco.org

For more information and to be notified when updates have been made to the project webpage, visit:
www.snohomishcountywa.gov/624

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Comments or questions? Please check the areas that were discussed.
1. _______Garland
2. _______San Juan
3. _______Bear Creek

Something needs to be done. Mow - or 8 Most likely we will not be able to get to our cabin for years to come

Did you receive answers to all of your questions? Yes ____ No ____

If you would like a staff member to contact you, please include your name, phone number and/or email address below:

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What is your interest in the project?
- [ ] I own property on Index-Galena Road
- [ ] I am a business owner near Index WA
- [ ] I live in the area, but not on Index Galena Road
- [x] I am a recreational user of the area
- [ ] Other

Please place your comments in the box near the front door, or mail it by October 31 to:
Crilly Ritz
Snohomish County Public Works
3000 Rockefeller Ave., M/S 607
Everett, WA 98201

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Comments or questions? This long-delayed project is worthy of the most environmentally responsible treatment possible, and we hope that your new timeline can be followed and the road needed so desperately to allow access to the wild Sky wilderness can be finished on time. Our museum visitors ask repeatedly about the project and the town's businesses need the Index-Jack's Pass-Skykomish Loop in order to prosper.

I also look forward in the future to re-opening the trail from Mineral City to Monte Cristo - this will depend on the Index-Galena Road being open to access that hoped for trailhead.

Thank you for attending today's meeting.

P.S., please think about a wide shoulder for our many cyclists.

Louise Lindgren
(A 40 yr. resident of Index)
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Comments or questions? I very much appreciate your work on reopening the road after such a long delay following the 2006 flood. As the braided channel continually moves, it seems logical to anticipate future action and have procedures in place to minimize their impacts. We also are pleased to learn that there are no apparent tribal/cultural sites involved, and we are very much concerned with those.

Did you receive answers to all of your questions? Yes [ ] No [ ]

If you would like a staff member to contact you, please include your name, phone number and/or email address below:

Thank you for attending today’s meeting.
Public Hearing: Index Galena Road
October 12, 2016 | 5:30 p.m. – 8 p.m. | Frank Wagner Elementary

Thank you for joining us at this informational meeting and public hearing for the National Environmental Policy Act (NEPA) Environmental Assessment comment period. County staff is available to discuss the project with you. You may share your formal comments with the court reporter or on this comment card.

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☒ Other

Recreation Industry Supporter

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Comments or questions:

This project is essential to providing access to the Wild Sky Area homes, campsites, hiking, etc. Everything has been denied to visitors & residents alike. Outdoor recreation is the basis of our economy in the Sky Valley. We convinced the developers they should be thrifty again. We need this fixed! We were told this project would be done in 2015. Nothing. 14 yrs!

Did you receive answers to all of your questions? Yes ☐ No ☑

To complete this has been a long time to wait. Please do whatever can be done as quickly as possible.

Thank you.

Sky Valley Chamber
Dubbie Copper
PO 46
Sultan, WA 98294

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Comments or questions? I am a Corson and own the property along the wash out 6.0 - 6.6. I would like to have NEPA for the protection of my properties banks along the river. 425-737-9812

Did you receive answers to all of your questions? Yes ☐ No ☐

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Comments or questions? I would like to see this expedited - the bridge has been washed out for many years but because we didn’t complain, it was pushed to the back burner even though it was promised to be repaired years ago - we are feeling very ignored.

Did you receive answers to all of your questions?  Yes ___ No [x]

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Comments or questions? I do not understand why it is taking 12 years to repair this road. The bridge came down a few years ago and it was replaced in no time. I realize that it is more important than this project, but 12 years is excessive. If there was a million dollars for timber to replace the road would be open. If the Governor owned property there the road would be open. If Phil had opened the bridge, the road would be open. Let's stop fighting around and get this project finished for the public who own it.

Did you receive answers to all of your questions? Yes ☐ No ☒

If you would like a staff member to contact you, please include your name, phone number and/or email address below:

Thank you

Frank Ferraro
Public Hearing: Index Galena Road
October 12, 2016 | 5:30 p.m. – 8 p.m. | Frank Wagner Elementary

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Comments or questions?

The North Fork of the Skykomish River is home to some of the greatest recreational white water boating in the state. I'm here to represent the white water community in hope that someday our access to the North Fork will be enabled through the completion of this project.

Did you receive answers to all of your questions? Yes ___ No ___

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**Comments or questions?**  Fix the Road ASAP -  
Snohomish Co Road Maintenance need to do much better maintenance on Decker River Road until Index-Galena fixed.

Did you receive answers to all of your questions?  Yes ___  No ___

If you would like a staff member to contact you, please include your name, phone number and/or email address below:  Cathy Nelson  425-231-2148

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Comments or questions? **VERY MUCH LOOKING FORWARD TO THE COMPLETION OF THIS PROJECT, AS A RESIDENT LIVING ON INDEX-GALENA RD. I KNOW THE IMPACTS ON THE REGION WILL INCREASE DUE TO EASE OF ACCESS, BUT THINK THE ACCESS IS WORTH THE COST.**

Did you receive answers to all of your questions? Yes ____ No ____

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Comments or questions? We had this meeting years ago. Up to 10 years ago, you said! Well, it’s 15 years and it’s not repaired. It could have been repaired in 3 months. (Using existing road.) You worried about the fish habitat. Well, there’s no fish anymore anyway. Do we have to think people drive like 50 to get our road repaired?

Did you receive answers to all of your questions? Yes ☐ No ☐

If you would like a staff member to contact you, please include your name, phone number and/or email address below:

Thank you for attending today’s meeting
FHWA Washington Division  
Attn: Jeff Horton  
Area Engineer  
711 S. Capitol Way, Suite 501  
Olympia, WA 98501  

Dear Mr. Horton:  

This letter is in response to Snohomish County’s notification to replace a bridge across part of the North Fork Skykomish River. The proposed project location (47.868748N, 121.471550W) is considered to be Non-Navigable Waters of the United States as defined in 33 CFR 2.36, and therefore does not fall within the jurisdiction of the Coast Guard for bridge permitting purposes. A Coast Guard Bridge Permit will not be required for this project.  

This determination is based on the fact that the North Fork Skykomish River is a tributary of the Skykomish River which is a tributary of the Snohomish River. The Snohomish River is a navigable waterway. The Skykomish River and North Fork Skykomish River is used by local mariners only, and does not support substantial interstate or foreign commerce. These waterways are not susceptible to such use either in their natural condition or by reasonable improvement.  

If you have any questions about our jurisdiction determination, please call me at (206) 220-7282.  

Sincerely,  

[Danny McReynolds' signature]  
DANNY McREYNOLDS  
Bridge Management Specialist  
Thirteenth Coast Guard District  
By Direction