



Confederated Tribes and Bands
of the Yakama Nation

Established by the
Treaty of June 9, 1855

April 3, 2020

Michelle Capp
District Ranger
USDA Forest Service
Cle Elum Ranger District
802 W. 2nd Street, Cle Elum, WA 98922

Dear Ms. Capp:

The Yakama Nation is pleased to provide comments in support of the Gold Creek Valley Restoration Project for its positive benefits to bull trout and improvements to overall ecosystem health/hydrologic function within the Gold Creek watershed. These same improvements have the potential to benefit other treaty-reserved fish and wildlife including salmon and steelhead, following future recovery efforts.

The Yakama Nation has a vested interest in restoring ecological function to the Gold Creek watershed for native bull trout. The Tribe has been working with a diverse group of partners and stakeholders to rescue bull trout that have become isolated in small pools within the dewatering section of Gold Creek during the summer months. Some fish are moved to areas with perennial streamflows, while a subset of these fish are transported to a hatchery setting. These fish are then reared in the hatchery until they are significantly larger and have a much higher likelihood of survival, at which time they are released back into their natal stream. The Yakama Nation is committed to helping this genetically distinct population of bull trout that is at severe risk of becoming extirpated due to its critically low numbers.

The Yakama Nation's future vision for the Gold Creek Valley would be to have connectivity for all fish and wildlife species and harvestable runs of treaty-reserved fish including sockeye, chinook, steelhead and bull trout. We hope to see fish and wildlife (deer, bear, elk, bobcats, wolves, wolverine, etc.) continue to use the crossing structures developed as part of the I-90 Snoqualmie Pass East project, allowing for gene flow and access to varied habitats. The Tribe would like to see the landscape restored to its historic condition as much as possible; this includes restoration of stream, riparian, wetland and floodplain processes. We hope to see passage improvements for native fish in lower Gold Creek and at Keechelus Dam. In addition, we would like to see significant improvements made to reconnect Gold Creek to its floodplain. This includes installing a larger span bridge to replace the current FSR 4832 bridge, reconnecting Gold Creek to its floodplain on the western side of the valley, and returning the Gold Creek Pond site back to historic riparian, wetland and forest complexes. It is critical that the hydrology and instream habitat in Gold Creek is restored to support bull trout and future fish recovery efforts.

We also hope to see recreation, both at the Gold Creek Pond site and within the Keechelus lakebed, minimized to the greatest extent possible to prevent destruction of habitat and the harassment of fish and wildlife.

Restoring hydrologic function to the Gold Creek Pond site is paramount to restoring instream habitat for ESA-listed bull trout in Gold Creek. Without restoring the hydrology in Gold Creek, instream improvements in lower Gold Creek are unlikely to provide their intended benefit. Gold Creek Pond is unnatural; it is a borrow pit that is compromising the ecological function of the Gold Creek Watershed at multiple scales. Monitoring data and groundwater elevations demonstrate that Gold Creek Pond is lowering the groundwater elevation of the valley, actively moving water away from the creek and intercepting water that would have otherwise discharged to the creek. Additionally, the unpermitted drain network associated with the local development moves water from the alluvial aquifer directly to the pond. Gold Creek Pond and the drainage network are causing direct and indirect mortality for bull trout, macroinvertebrates and other native fish species. Altered hydrology is also draining wetland habitat and inhibiting the establishment of riparian plant species.

The Yakama Nation is in support of a restoration project that provides the highest potential to keep water in Gold Creek and improve floodplain function. Climate models for the Pacific Northwest are predicting decreasing snowpack, more precipitation falling as rain, and decreased summer streamflows. Because of this, it is imperative that this project provide the greatest likelihood of keeping water in Gold Creek, for imperiled bull trout and future recovery of anadromous fish. A project such as the "Forest Wetland Concept" would do just this and would (most closely) restore habitat at the pond site back to their historic conditions, benefiting not only fish, but mammals, birds, amphibians and many species of invertebrates with a mosaic of wetland and forested habitats. Enhanced floodplain connectivity and wetland habitats would also improve water quality, promote the growth of riparian vegetation, and increase groundwater storage. In terms of ecological function, putting the pond most closely back to its historic condition is the best thing that we can do.

In addition to restoration of the pond site, it is clear that instream habitat conditions in lower Gold Creek are severely degraded, due to historic logging practices and the subsequent overwidening and destabilization of the channel. This has resulted in poor instream habitat conditions and a lack of riparian vegetation in lower Gold Creek, and has exacerbated the dewatering issue. Yakama Nation hopes that lower Gold Creek can be restored to stabilize the channel and maintain perennial flows, while also providing instream habitat complexity and native riparian vegetation. Large wood installation, side-channel development, levee removal and native plantings are all instrumental in achieving these goals.

The Yakama Nation hopes to see language in the NEPA documentation for the Gold Creek Valley Restoration project that 1) requires post-implementation monitoring of fish passage conditions in Gold Creek and that 2) allows for adaptive management to ensure fish passage over time as both habitat and climatic conditions evolve. After restoration of the pond and stream-channel are complete, it is important to remain vigilant and monitor this dynamic environment, especially with an evolving hydrograph in this changing climate.

The Yakama Nation would also like to see the footprint for recreational access in the Gold Creek Pond area minimized to the greatest extent possible. The unnatural Gold Creek Pond takes up roughly 90% of the floodplain in an important wildlife migration corridor. On top of that, recreationists in and around Gold Creek can be destructive to habitat and deter wildlife. Issues with poaching, construction of rock dams that block fish passage, and direct harassment of bull trout (especially during spawning) are regularly observed in other Yakima Basin tributaries where recreational access and bull trout streams intersect. With growing populations in the Yakima Basin and the ever-increasing presence from the greater Seattle area, the Tribe would like to see this project minimize the footprint and keep recreational access out of the floodplain and away from the creek as much as possible.

Gold Creek is a headwaters tributary to the Upper Yakima River. It needs to be viewed in this manner, and not simply as a tributary to Keechelus Reservoir. The Yakama Nation and our partners are investing significant amounts of funding and time in restoring bull trout, steelhead, spring chinook and sockeye salmon. We are looking towards future conditions and hope that Gold Creek can be restored for all of our treaty-reserved fish and wildlife. We hope that the Forest Service and its partners recognize the Gold Creek Valley Restoration as an integral piece to the larger restoration of the Yakima headwaters and even larger Yakima Basin. It is our duty to make systems like Gold Creek more resilient for all of our fish and wildlife species, to give them the best chance of survival in the face of a changing climate.

Sincerely,



Philip Rigdon
DNR Superintendent
Yakama Nation