



Trout Unlimited
Washington Council of Trout Unlimited

January 16, 2024

Louis "Ted" Neff, Mt. Baker District Ranger
Mt. Baker Ranger District
810 State Route 20
Sedro-Woolley, WA 98284-1263

RE: Bagley Dam Decommissioning Project (61567)

Dear Mr. Neff,

Trout Unlimited (TU) appreciates this opportunity to comment on the Mt. Baker-Snoqualmie National Forest's scoping process for the Bagley Dam Decommissioning Project.

With over 300,000 members and supporters – including 4,000 members in the state of Washington, TU is North America's largest nonprofit organization dedicated to the protection, conservation, and restoration of cold-water fish and their watersheds. Our strength is derived from our grassroots members and volunteers working together with our staff toward the common goal of ensuring resilient fish populations for future generations. TU is dedicated to using the best available science to guide our efforts, and we have the benefit of applying the expertise of our staff fisheries scientists to support policy and science efforts requiring careful analysis.

After careful review of the proposed project and scoping letter (12-18-2023), we offer our support for the decommissioning of the Bagley Dam, which consists of demolishing Bagley Dam, installing a recreational trail bridge at the current dam site, re-routing a small section of the Bagley Lakes Loop trail, and stream channel reconstruction.

Since 1965, the dam has been in a partially breached condition. Because of this poor condition, more recently it was classified as a Significant Hazard by the Washington Department of Ecology because the creek passes under State Highway 542 downstream of the dam. In the event of a full dam failure, it may cause damage to the Highway 542 bridge crossing of Bagley Creek. Because of the poor condition of the dam and the potential damage that could occur to the Department of Transportation infrastructure during a dam failure, we support the removal of Bagley Dam.

This project is in the North Fork Nooksack River basin, about ten miles above a natural anadromous fish barrier, so we see no immediate impact to salmon or steelhead. Additionally, with the elevation of the lakes and creek, and the natural lake upstream of the Bagley Dam, it seems unlikely that there would be much of an impact on water quantity or quality.

Bagley Lake currently contains Eastern Brook Trout (EBT) and they are already documented throughout Bagley Creek and the NF Nooksack River. In this situation, dam removal will not introduce the possibility of introgression with native char in the long-term. However, in the near-term, dam removal would be expected to displace the EBT population in Bagley Lake, so there would likely be a short-term influx of EBT in downstream areas as the EBT disperse out of the lake area and thus potentially increasing the risk of introgression over the near-term. We do agree with the assessment that the contribution of EBTs to downstream habitat would be negligible given the small size of the population in Upper and Lower Bagley Lakes and undetectable at the scale of the North Fork Nooksack watershed. However, to be sure, should this project move forward, we recommend that population monitoring commence before, during, and after the project to consider the impacts of the EBT population on native trout and char.

We're also supportive of this recreational fishery continuing as it both provides anglers an opportunity to harvest fish and the removal of EBT from the ecosystem can help reduce the potential impacts on Bull trout and Dolly Varden populations downstream.

Given the popularity of this trail and the access it provides to Heather Meadows and Chain Lakes Trail, we're in support of the new alignment of the trailhead and the installation of a recreational trail bridge at the current dam site.

Again, we appreciate the opportunity to provide comments on Mt. Baker- Snoqualmie National Forest's proposed Bagley Dam Decommissioning Project.

Sincerely,

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