

May 1, 2024

Okanogan-Wenatchee National Forest
Cle Elum Ranger District
Responsible Official Scott Robinson, District Ranger
c/o Patty Garvey-Darda, Project Lead
803 West 2nd Street
Cle Elum, WA 98922

Submitted to:

<https://cara.fs2c.usda.gov/Public/CommentInput?Project=57415>

Subject: Gold Creek Valley Restoration Project, Draft EA Comments

The following are the comments of the Wise Use Movement on the Draft Gold Creek Valley Restoration Project Environmental Assessment and Finding of No Significant Impact (Draft EA).

General Comments

We support the protection, preservation, restoration, and enhancement of bull trout in the Yakima River Basin. However, the dire straits of bull trout populations overall are due to the Bureau of Reclamation, which constructed irrigation dams resulting in loss of connectivity and bull trout habitat. In turn, the beneficiaries of this situation over the past hundred plus years have been Yakima River Basin irrigation districts. These irrigation districts have vastly over-appropriated available water supplies in the Yakima Basin in order to grow non-food crops such as wine grapes and hops, and also export hay and alfalfa to Asia at the expense of an historically abundant anadromous and native fisheries.

More specifically, Gold Creek Pond also acts as an impediment to bull trout recovery. Because Gold Creek Pond began as a gravel pit to source gravel for construction of I-90 during the 1970's through 1980's, the Federal Highway Administration also shares partial responsibility for adverse bull trout habitat impacts. Therefore, it is appropriate to request that both the Federal Highway Administration and Yakima Basin irrigators pay the cost for this proposed restoration project.

More specific comments are as follows:

- Page 3 states that vehicles drive in the Keechelus Lake bed and within Gold Creek. Page 8 states that "Four gates and guardrails would be installed along the Keechelus Boat Launch Road (Forest Service Road 9070-219) to restrict vehicles to the roadway and prevent damage to Gold Creek and the lake bed." It also states, "The USFS would issue a legal closure order to (1) prohibit vehicle travel on the lake bed, Gold Creek channel, and adjacent wetlands; (2) prohibit overnight camping along Forest Service Road 9070-219, in the boat launch parking area and at the Keechelus Lake shoreline and lake bed; and (3) seasonally close Forest Service Road 9070-219 at the Washington State Parks Lake Keechelus trailhead parking lot to motorized vehicles, when water levels are 2,480 feet in elevation or lower, until access control measures are in place at the boat launch parking area."

Is this sufficient to prohibit vehicle access to the lake bed and within Gold Creek? What sort of resources would the Cle Elum Ranger District use to enforce this proposed closure? Are there other access points along Keechelus Lake where access might take place, especially during lake drawdown?

- According to the Department of Ecology, a local Shoreline Master Program (SMP) “should include federal lands within shoreline jurisdiction. . . Ecology will assume the SMA applies on federal land unless a local government provides documentation of exclusive federal jurisdiction.” <https://apps.ecology.wa.gov/publications/parts/1106010part5.pdf>
The Kittitas County Shoreline Management Program (KCSMP) includes Keechelus Lake as well as Gold Creek from the creek’s outlet into Keechelus Lake upstream to the west parcel line of parcel 138135 and the west and south parcel lines of parcel 44337. Kittitas County’s parcel viewer identifies parcel 138135 as owned by the USFS, but does not return an owner for parcel 44337.

The KCSMP also states:

4. Federal lands include, but are not limited to, national forests, national parks, national wilderness areas, and lands owned by the Federal Bureau of Land Management (BLM). The following subsections shall guide the determination of SMP applicability on federal lands:

a. Federal development on federally owned land is not required to obtain a shoreline permit, unless otherwise required by law, but shall be consistent to the maximum extent practicable with this master program;

KCSMP Sec. 1.7.4, page 13, Sept. 14, 2021.

What activities, if any, would be proposed within the jurisdiction of the KCSMP? How would the proposed project be consistent to the maximum extent practicable with the master program?

Please provide a written response to these comments. Thank you.

/s/ David E. Ortman
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