

May 1, 2024

Okanogan-Wenatchee National Forest
Cle Elum Ranger District
Responsible Official Scott Robinson, District Ranger
c/o Patty Garvey-Darda, Project Lead
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Submitted to:
<https://cara.fs2c.usda.gov/Public/CommentInput?Project=57415>

Subject: Gold Creek Valley Restoration Project, Draft EA Additional Comments

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

Page 15 of the Draft EA states:

Gold Creek bull trout are genetically distinct from other native bull trout populations remaining in the Yakima Basin, as this population was isolated by a constructed crib dam at the outlet of Lake Keechelus in 1905, and the much larger Keechelus Dam in 1917. Population numbers for Gold Creek bull trout are extremely low and at risk of extirpation. As a result, these fish are a priority for protection by federal, state, and local agencies and have been the focus of studies to determine beneficial actions. Bull trout are culturally significant to, and have long been a concern of, the Yakama Nation, who are leading efforts to restore populations and enhance habitat for bull trout and other salmonids.

Observers have consistently reported the first migrants in the stream about the second or third week of July (Craig 1997; Wissmar and Craig 1997; James 2002; Meyer 2002), with the majority entering between mid-July and mid-August (James 2002). Individuals move quickly upstream to holding pools in the same general segment of the creek (roughly between River Mile 3 – 5.7) where they will later spawn, beginning in early to mid-September (NSD 2013). Fall rains also stimulate adults to move up from Lake Kachess in the second mode of a bi-modal spawning run distribution.

Currently over a mile of Gold Creek dewatered annually, persisting for weeks to months, creating a barrier to spawning adult bull trout trying to migrate to the headwaters of Gold Creek and causing direct mortality. Annual dewatering of Gold Creek represents a significant impact to the population. A study in 1993 and 1994 estimated that 63 and 24 percent, respectively, of adult bull trout died from being stranded in the dewatered section of Gold Creek (Wissmar and Craig 1997), especially for individuals migrating in the second mode if fall rains do not maintain connectivity through the spawning season. Juvenile bull trout are also stranded as they move downstream after hatching.

Observations indicate there is some level of dewatering that occurs naturally; however, it is exacerbated in years of drought and by human-caused changes in the valley.

Dewatering starts near River Mile 1.5 and proceeds up and downstream from there, extending upstream of Heli's Pond to around River Mile 2.1, and downstream of Gold Creek Pond past River Mile 0.9. Dewatering typically initiates mid-August (NSD 2013),

however dewatering was first observed on July 24, 2013, and August 3, 2014, during two years of monitoring (NSD 2013, NSD 2014a). While it would be ideal for Gold Creek to maintain perennial flow, prolonging the onset of dewatering through August and creating conditions where it could rewet quickly would provide the access needed for more spawning fish to migrate through the reach and meet the Project goals.

While this narrative does mention the construction of a crib dam at the outlet of Lake Keechelus in 1905, and the much larger Keechelus Dam in 1917, there is no explanation or analysis of how the drawdown of Lake Keechelus during the year to supply water for irrigation districts in the Yakima River Basin has contributed to the decline of this isolated bull trout population.

How does the draining of Lake Keechelus each year impact the movement of bull trout into Gold Creek? Bull trout are listed as threatened under the Endangered Species Act. Therefore, shouldn't withdrawing less water from Lake Keechelus be part of restoring Gold Creek Valley to provide better bull trout migration through this reach?

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

/s/ David E. Ortman
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