

Data Submitted (UTC 11): 4/8/2020 7:00:00 AM

First name: Alex

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Organization: Yakima Basin Fish and Wildlife Recovery Board

Title: Executive Director

Comments: Please see the attached letter.

Dear Ranger Capp,

I write on behalf of the Yakima Basin Fish and Wildlife Recovery Board (the Board). The Board was created by 21 county and city governments and the Yakama Nation to promote the recovery of at-risk fish and wildlife species in the Yakima Basin. One of our primary goals is to support recovery of steelhead and bull trout, so that these species can be removed from the federal Endangered Species Act (ESA) threatened species list.

The remaining bull trout populations in the Upper Yakima are all at risk of extirpation, which threatens our ability to recovery this federally-listed species. In 2012, the Yakima Basin Fish & Wildlife Recovery Board brought local and regional partners together to complete the Yakima Bull Trout Action Plan (BTAP). This plan identifies what actions need to be done to recover bull trout in the Yakima Basin. The BTAP identifies the restoration of habitat and flow in Gold Creek as one of the highest priority actions for bull trout in the Yakima Basin. For this reason, we are glad to see the scoping notice recently released for the Gold Creek Valley Restoration Project and look forward to participating in the development of this project. We have reviewed the scoping materials, and would like to note that:

1. Groundwater monitoring and modelling clearly show that Gold Creek Pond lowers the groundwater table of Gold Creek for a considerable distance upstream. We commend the Forest Service and other project partners for their efforts to identify and implement a comprehensive project to restore natural groundwater elevations and associated flows in Gold Creek.
2. Many of the actions included in the proposed project occur on or directly impact non-USFS lands. Effort should be taken to engage these landowners in the planning of actions on their lands (e.g. proposed stream restoration actions and drainage system modifications) to ensure that the full suite of proposed projects can be fully implemented, across landownerships.
3. Given the current declines in the abundance of the Gold Creek bull trout population, individual beneficial project elements such as instream restoration and drainage reconfiguration need to be implemented as soon as possible, to ensure that bull trout remain in the creek at time that the entire proposed project can be completed, and its full benefits realized.
4. Recent data shows that bull trout originating from Gold Creek make use of other tributaries to Keechelus Lake.

Additional actions to remove artificial fish passage barriers and improve habitat conditions in tributaries to Keechelus Lake (e.g. Cold, Meadow, Resort and Rocky Run Creeks) should also be pursued, to provide additional habitat for sub-adult bull trout that have migrated out of Gold Creek.

Thank you for the chance to offer these comments, and for the effort that the Cle Elum Ranger District and its partners are putting into developing this much needed project.

Sincerely,

Adam Fyall Chair