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First name: Laurel
Last name: Baum
Organization: Conservation Northwest
Title:
Comments: Please see attached document.

[Forest Service note: Body of letter added below.]

On behalf of Conservation Northwest, please accept these comments for the Gold Creek Valley Restoration Project. Conservation Northwest supports efforts on the Okanogan-Wenatchee National Forest that restore forest and watershed resiliency where lacking, and ecological processes that maintain quality fish and wildlife populations and habitat.

Conservation Northwest has a 30-year history of successfully leveraging funding and public support to protect, connect, and restore habitat and wildlife in the Pacific Northwest. Our success is owed in large part to our commitment to collaboratively work with land managers, scientists, user groups, industry and other stakeholders to develop and implement durable restoration plans and projects. For more than two decades, Conservation Northwest has successfully championed largescale restoration of this landscape and habitat connectivity of lands adjacent to I-90. CNW engaged in the Snoqualmie Pass Adaptive Management Area (97[rsquo]) work, which identified the Snoqualmie Pass area as a major wildlife corridor and critical linkage between the North and South Cascades that is uniquely situated for high elevation species and needed for large scale landscape permeability. We were then a key partner in the I-90 Land Exchange (98[rsquo]) which launched the Cascades Conservation Partnership and worked to change the land ownership configuration, to one that was more contiguous, providing quality habitat key to the long-term persistence of numerous wildlife species. As part of our I-90 Wildlife Corridor Campaign we have been a leader in the I-90 Bridges Coalition, engaged in volunteer planting projects through strong collaboration with the Forest Service, and wildlife monitoring in coordination with Washington State Department of Transportation and other pivotal partners. The completion of eleven wildlife crossing structures and more planned into the future has already improved permeability across stretches of the 15-mile [lsquo]I-90 Snoqualmie Pass East Project[rsquo]. This has already been a regional and national story of success, showcasing what can be accomplished for the resilience of wildlife populations and highlights the importance of Gold Creek Valley, specifically, as a critical high elevation linkage zone between the North and South Cascades in Washington State.

Conservation Northwest supports scientifically-rigorous restoration efforts that protect and restore key habitats and habitat features, and create conditions which allow habitat to be maintained over time through natural processes. As such, we support the need for action identified in the Gold Creek Valley Project to proactively restore the hydrologic function of the creek by addressing the impact the pond is having on hydrology in the valley, thus being able to reestablish the forested wetland ecosystem and species assemblages that more closely resemble what was present before the area was altered for use as a gravel pit for I-90. While we have participated for years in volunteer efforts, partnering with the Botanist of OWNF, these efforts to plant native species are still just a [lsquo]band aid[rsquo] and won[rsquo]t accomplish long term restoration without addressing the core issue of restoring the hydrologic functions that support diverse wetland species. These actions will enhance the creek valley and create high-quality aquatic habitat to support threatened bull trout and other fish species that are dependent on cold-water spawning grounds like that found in the headwaters to the Yakima river.

We see the Gold Creek Valley Restoration Project as valuable opportunity to move the current impaired conditions toward desired conditions, which will better support endangered fish populations while educating the public about the importance of functioning wetlands and habitat connectivity progress in the valley. At present, Gold Creek is not a properly functioning stream; its channel, floodplain, and water quality have been affected by

a legacy of human use and alteration, including gravel extraction for I-90 which created Gold Creek Pond and logging in the valley which created a broad, unanchored stream channel with little legacy wood. Correcting conditions would address the de- watering that currently prevents adult fish from accessing upstream spawning areas. This has affected both aquatic, riparian, and terrestrial habitats in the valley and the species dependent upon them and represent the historic loss of another forested wetland from the mosaic of habitats that makes up the Cascades. Decades of human impact have thrown this ecosystem out of balance, the restoration work in Gold Creek Valley is our chance to repair more than a century of human-caused impacts.

Overall all, we strongly support proactive aquatic restoration to: 1) restore the natural hydrologic function and biodiversity associated with a wetland ecosystem in the Gold Creek Pond area; 2) improves hydrologic functions that keeps water in the creek stabilizes the stream channel through additions of large woody materials, narrowing the channel, revegetating with diverse native plant communities, and enhancing stream complexity; 3) protect and enhance wildlife habitat through improved riparian corridors and increased biodiversity associated with wetland ecosystems and 4) find a balanced recreational approach that does not negatively impact fish and wildlife use of the nearby habitat, improved stream corridor, and wildlife crossing structures.

We encourage action that is proposing to correct the hydrology of Gold Creek Pond which is altered and negatively impacting endangered bull trout and the in stream flows of Gold Creek they depend upon. We stand behind actions which will reestablish the historic wetland conditions that will support an abundant biodiversity of both aquatic and terrestrial species in the valley. Gold Creek Pond does not currently function as high quality habitat, it acts as a siphon, pulling water away from the creek and into the unnaturally man-made deep pond which supports far less species than that of a forested wetland. We recognize that there is need to integrate several large-scale riparian, instream, wetland, and floodplain restoration projects across the Gold Creek Valley and support moving the process forward for the benefit of fish, wildlife, and overall improved ecosystem functions.

With regard to the proposed action related to aquatic habitat, we see removing fish passage barriers, increasing stream complexity and large wood structure, and reconnecting streams to floodplains as described as vitally important to restore overall ecological and hydrological functions. We are encouraged by the involvement of the Yakima Nation as a Cooperating Agency and support tribal fishing rights and returning the landscape to more historic functions that will support and abundance of fish and wildlife species in this valley. The proposed restoration actions to Gold Creek will improve critical spawning and rearing habitats for native fish. Future reintroduction efforts of ESA-listed salmonids will also benefit when passage is provided at Keechelus Dam through the Yakima Basin Integrated Plan. Historically, this used to be an abundant chinook fishery and once fish passage at Keechelus damn is restored this area will again be able to support salmonid species. Due to its location as the headwaters to the Yakima River, it is one of the area[rsquo]s most sustainable cold waters reaches for spawning.

Gold Creek is a critical area for connecting and linking wildlife populations on either side of I-90 and the restoration proposals will support an increased biodiversity of species. The restoration area represents one of the highest elevation sites with recent improved infrastructure to facilitate habitat permeability, everything else along the I-90 Snoqualmie Pass East Project Corridor sits at a lower elevation. This project aids in providing contiguous habitat in a major wildlife corridor in the Gold Creek Valley connecting the Alpine Lakes Wilderness area to the north of Interstate 90, with the Norse Peak and William O. Douglas Wilderness areas to the south. Wetlands also play a critical role in the overall health of watersheds and maintain important ecosystem productivity. The diverse community of vegetation found in wetlands protects water quality and provides habitat to wetland-dependent vertebrate and invertebrate species such as frogs, salamanders, and butterflies. The improvements we will see to the overall health of the ecosystem in this critical area is worth our support and energy.

We would like to see no net increase in recreation in this project area. Due to the critical nature of the surrounding habitat as a wildlife corridor, there is need to minimize recreational use in the area and re- direct

future increases in recreation to other areas that are not as critical a north-south linkage for wildlife. We recognize the need for people to have opportunities to connect and recreate in nature, and support the proposals of ADA accessible trails, viewing and walking areas and educational and outreach materials. With the project proposal should also come recognition on behalf of the Forest Service that WSDOT, USFWS, WDFW, CNW and others involved in the Habitat Connectivity Working Group are developing recommendations on the closest distance recreational access and parking should be to existing wildlife crossing structures. Setting limits on human access around the wildlife crossing structures will help to maximize wildlife usage and connectivity and limiting capacity at nearby parking lots & trails may also be necessary to achieve this goal. Currently, for people to access the snowshoe trail in the winter, cars are parked adjacent to the I-90 wildlife [rsquo]jumpout[rsquo] structure on the 4832 road and within 150m from the Gold Creek crossing structures. Based on a number of supporting articles it is recommended to limit human use around and near wildlife crossing structures. We support measures that propose to downsize parking, monitor human use and provide closure guidelines around the wildlife crossing structures. We also recommend the Forest Service do an analysis on the use of the area to assess levels of past and current use and keep it in that same range or lessen the human footprint. There has also been a precedent set of large groups using the area for weddings, not only are these a disturbance to wildlife & can cause resource degradation, but they impact other users. We recommend gathering areas be minimized to mitigate these issues in the future, special use permits be enforced, and alternative recreation sites get identified to concentrate the impact elsewhere.

We appreciate the ability to collaborate on this project with the Forest Service and diverse partners and to provide these comments in complement to that collaboration.

Sincerely,

Kathleen S. Gobush, PhD Conservation Program Manager

Laurel Baum Conservation Associate