

March 31, 2020

Patty Garvey-Darda Interdisciplinary Team Leader, Gold Creek Valley Restoration Project Cle Elum Ranger District, Okanogan-Wenatchee National Forest 803 West 2nd Street Cle Elum, WA 98922

Dear Ms. Garvey-Darda:

Mid-Columbia Fisheries Enhancement Group is a non-profit organization dedicated to protecting and restoring wild salmonid populations and their habitats through restoration, protection, education, and community involvement. We are intimately familiar with the issues and complexities associated with the restoration of lower Gold Creek Valley. There is strong emotional connection to Gold Creek Pond from recreationists and nearby residents, but the clear negative impacts to fish and wildlife stemming from the pond require action. A science-based approach to restoring Gold Creek is an important step for recovering threatened bull trout, building upon the I-90 connectivity project, and eventually returning salmon and steelhead to the headwaters of the Yakima River.

In the past decade we have witnessed the remaining upper Yakima River bull trout populations struggle for existence. With the recent extirpation of the Teanaway population, Gold Creek is one of 3 remaining bull trout populations in the Upper Yakima Basin, with each occurring at very low numbers. The legacy impacts of reservoir construction, habitat loss, overfishing, habitat degradation, and isolation have driven the Gold Creek population to critically low levels. In the face of these legacy impacts, the Gold Creek bull trout population has continued to persist. Increases in the extent and duration of annual dewatering in the lower reaches of Gold Creek due to anthropogenic activities threaten the future of this population.

Throughout their range bull trout make use of streams that experience periods of dewatering. This is a natural process that historically occurred in Gold Creek. However, the extent and duration of the dewatering in Gold Creek has increased due to habitat alteration from Keechelus dam, historic logging activities that destabilized the stream banks, climate change, draining of wetlands, and the excavation of Gold Creek Pond to supply gravel for the construction of I-90. Most of these issues cannot be addressed through restoration actions. We can't restore old growth forest overnight, climate change needs to be addressed on a much larger scale, and Keechelus dam isn't going anywhere. In contrast, restoration of lower Gold Creek and Gold Creek Pond can happen in a relatively short period of time to help reduce the extent and duration of dewatering events in lower Gold Creek valley. Such an action would provide adult bull trout a longer migration window and reduce mortalities for all age classes within the current dewatering reaches.

The restoration of Gold Creek pond isn't just about bull trout. The I-90 connectivity project has improved the movement of fish and wildlife under and over the highway. The Gold Creek valley is a vital component of this effort and Gold Creek pond is a large obstacle impeding the movement of organisms through the valley. Restoration of lower Gold Creek and the pond would help facilitate the movement of fish and wildlife through the valley. Additionally, it is our hope that someday fish passage will be constructed at Keechelus Reservoir. The restoration of Gold Creek will improve habitat for the future return of spring Chinook, steelhead, and sockeye to their historic spawning grounds.

In conclusion, the negative impacts to fish and wildlife stemming from Gold Creek pond and other historic activities require action. Mid-Columbia Fisheries Enhancement Group is supportive of a science-based approach to restoring Gold Creek. The selected restoration action should 1) reduce the extent and duration of dewatering, 2) improve instream habitat for fish and restore natural processes, 3) return native plants to the heavily disturbed areas, and 4) facilitate the movement of fish and wildlife through Gold Creek valley and under I-90. A well-developed restoration project will aid the recovery of Gold Creek's bull trout, build upon the success of the I-90 connectivity project, and eventually return salmon and steelhead to the headwaters of the Yakima River.

Sincerely,

Glenn Miller

Glenn Miller, President Mid-Columbia Fisheries Enhancement Group

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