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Organization:

Title:

Comments: Thank you for the opportunity to provide feedback on this ambitious project.

Comments are my own and do not reflect those of any group. However, for the past two years I have done significant self-education on Bull Trout, water rights, and water storage in the Upper Yakima Basin. I have attended numerous YRBWEP, OCR, and Bull Trout Working Group meetings. I am heavily involved in Save Lake Kachess, Friends of Lake Kachess, and Friends of Bumping Lake. This makes me skeptical of any work in the Yakima Basin which always leads back to a water grab.

The 800 Pound Gorilla. There is a massive dam and annual summer lowering of the water table in the Gold Creek Basin. Detriments from the Keechelus Dam should be included in future NEPA documents, otherwise it is just selective science.

Two main goals of this project are to improve Bull Trout numbers and reduce dewatering of Gold Creek. This proposal lacks any definitive guarantee that these actions will end the dewatering in portions of Gold Creek. There is no guarantee this will end dewatering of the creek. The endangered Bull Trout need water now, not from a long term "restoration" project that may be completed long after they are extirpated. I will provide scoping ideas later in my comments.

Restoration:

Restore entails returning to its natural conditions. Gravel deposits are sieves by nature. Restoring Gold Creek Pond would entail filling the original quarry with like materials that were originally extracted. Those materials would not aid in improving the hydrology and dewatering of Gold Creek. If restoration is the goal remove Keechelus Dam and restore the creek below RM 0 to its natural level where it enters Keechelus Lake at its historic natural level.

Limited resources:

Kachess River, Mineral Creek, and Box Canyon Creek in the Kachess watershed have far superior numbers of existing Bull Trout. Spending precious resources in Gold Creek Valley, specifically filling Gold Creek Pond, provide no guarantees. 14 million dollars in Box Canyon and Kachess River would yield superior results. I fully support channel improvements and large wood structures in the Gold Creek.

Lack of Alternatives-

The documents provide 3 variations of the same plan. Fill Gold Creek Pond.

Pump Back. Extract water from Keechelus to fill dewatered sections.

Water storage at higher level and timed releases. Serving both irrigation and Gold Creek needs.

Problems:

Lack of peer review.

Single source vendor.

Single source project manager.

Lack of Data.

No listing of desired CFS in the Creek.

No inclusion of River mile -0, i.e. Lake/Reservoir bed. Originally Gold Creek River mile.

No data provided to explore correlation to Keechelus pool levels.

Connected hydrology to the former natural Keechelus Lake / Keechelus Reservoir. I would expect you will find direct correlation to lake levels and dewatering. Surface and subsurface ground water are connected.

Science based:

Goals of the Yakima Integrated Plan leads to selective science.

Natural Systems Design is the only organization to explore alternatives, and they stand to gain the bigger the project is. Additionally, there has been no peer review of their work.

Scoping documents list active and potentially active Bull Trout habitat. These show no growth in potential in the Kachess watershed, which is outright false: 'No growth in Box Canyon Creek, Mineral Creek, or other forks of Kachess River.'

Thetis Creek recently had a Bull Trout observation.

Scott Kline and William Meyer presented the potential of Bull Trout above Peekabo Falls in Box Canyon Creek to the BTWG just last week.

FSR 4832:

This bridge should be reconfigured to meet the standards of the I-90 Gold Creek Underpass.

Ideas to explore from this scoping process:

Line Gold Creek Pond. This can be done for approximately \$1 million or \$1 per square foot. This eliminates the need to haul in 75,000 dump truck loads of fill and the carbon emissions that go with it. Water from the Pond can be pumped back up the hill and dewatered portions of the creek. This water can travel underground thus lower the water to the ambient ground temperature of 50-54 degrees. While not ideal for Bull Trout, as Trout Unlimited says, any habitat is better than no habitat. Stream flow augmentation is nothing new, KRD mentions their program in every single media inquiry it gets.

Line Gold Creek Pond and hand over operations to USBR or a pro-ratable water district. Water storage at higher level and timed releases. Serving both irrigation and Gold Creek needs.

The Yakima basin and Kittitas County is looking for any water Storage it can find. With no data in the scoping documents my best estimate is Gold Creek Pond has 450-735 Acre Feet of storage capacity.

Pump out of Keechelus Lake to dewatered sections. This could be a costly venture, but not \$14 million. The water returns to the reservoir thus no significant net loss.

Install Grout curtain along Gold Creek. This option is less expensive. If the restrictions of USFS lands restricts this solution, a land swap with Forterra or similar should be explored to provide the most expedient and cost-effective solutions to help Bull Trout now.

Explore other possibilities of uphill storage whether it be mini-dams, tanks, or underground storage to provide timed releases to dewatering sections as needed.

Use Heli's Pond for Timed releases of water.

Utilize underground water manifolds to cool water for release to Gold Creek.

Forest Service Ownership - Transfer of Title. If any better solutions are found to be reasonable but the -USFS is restricted from allowing, transfer of title should be considered in the best short-term interest of the endangered Bull Trout.

Closing:

Direct application of water to dewatered sections is the only guarantee. Anything else is just hope. Filling one body of water so you can drain another just makes no sense. I'm all for restoring things to the way they were.

Tear out all the dams and fill the pond. Deal.

I appreciate the hard work and passion of so many in this process: USFS, WDFW, MCFEG, YBFWRB, The Yakama Nation, Forterra, and many others. Many good people have done a lot of good work. It is a shame I need to be so skeptical of a plan that is born of YRBWEP and it's intended goal to aggressively find new water. Follow the money.

I hope these comments can be addressed in future NEPA documents and look forward to supporting a reasonable plan to improve habitat for Bull Trout and other species in a connected Gold Creek Valley.

And oh yeah, Save Lake Kachess!

John Reeves

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