Data Submitted (UTC 11): 4/30/2024 11:38:34 PM

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Organization: Washington Department of Fish and Wildlife

Title: fish and wildlife biologist Comments: Aquatics Report:

Page 29. Duration and severity of seasonal dewatering. Many real and important impacts of season dewatering of Gold Creek are presented here. In addition, seasonal dewatering also has potential to reduce the macrophyte and the benthic invertebrate community, leading to less food resources available for young Bull Trout and their prey. This annual loss of productivity would be mitigated with the design elements of the proposed action. Page 35. Environmental Consequences: Proposed Action. Gold Creek Bull Trout are on the verge of extirpation. The implementation of large-scale, ecosystem-based processes through instream channel restoration, Gold Creek pond restoration, and Heli's pond restoration are needed to restore the valley. These actions will address many of the limiting factors to Bull Trout viability. A "no action" alternative is unacceptable. Significant delays in restoration will reduce the chances of recovering Bull Trout in Gold Creek. WDFW supports the USFS coming to a NEPA decision to move the proposed restoration actions forward as designed to restore viable populations of Bull Trout in Gold Creek, as well as prepare for the potential introduction of anadromous fish.

Biological Report:

Page 26. 4.1 Plants AND Page 36. 6.1.1. Effect determinations on plants. The text notes that Yellow earth tongue is documented within the Project footprint but does not occur within the quality habitat where this species is usually documented. Instead, these plants are located on disturbed sites where non-native vegetation and anthropogenic disturbance is impacting the recovery of healthy native plant communities and it appears that these individual plants will not get any protection because they do "not occur on high quality habitat that is worthy of protection". WDFW encourages preservation of the existence of this species in the project area, either by natural reseeding if the species occurs in adjacent areas, preserved by excavation and transplanting to viable locations, or cultivated as seeds or seedlings brought from somewhere else and planted into the restored area. Page 37. WDFW appreciates the need to avoid accelerating invasive plant dispersal and growth with the disturbance activities of the project, and that an integrated weed management approach will be implemented. There are other measures that are listed that "could" be taken, such as "retreatment, during the activity periods, physically removing the seed bank layer of soil, and burying at a much deeper elevation as well as post restoration" but no language suggests that these measures will be taken. Please incorporate these BMP measures as much as possible to avoid establishment of invasive plant species.

Page 40. WDFW appreciates that the document notes that pre-implementation surveys will be performed to determine the presence of plant species so that impacts to them can be avoided.

Recreation and Scenic report:

The WDFW appreciates that the USFS plans to implement recreational elements associated with the project that are consistent with connectivity emphasis areas, aquatic conservation strategy objectives, riparian reserve standards and guidelines, and the NW forest plan. WDFW believes the replacement strategy without significant increase in recreational facilities (as outlined in Table 2 on page 39) best fits with the above-mentioned objectives and will allow the goals of the Gold Creek Valley Restoration Project to be realized.