

Data Submitted (UTC 11): 5/2/2024 6:57:37 PM

First name: Laurel

Last name: Baum

Organization: Conservation Northwest

Title:

Comments: Responsible Official Scott Robinson, District Ranger May 2nd, 2024

c/o Patty Garvey-Darda, Project Lead

Cle Elum Ranger District

803 W 2nd Street

Cle Elum, WA 98922

Dear Scott Robinson,

For over 25 years, Conservation Northwest has partnered with natural resource agencies, stakeholders, and Tribes to identify, plan, fund, and implement landscape-scale watershed restoration investments to address the barrier effects of I-90 and connect and enhance habitat to provide migratory corridors for fish and wildlife in the Snoqualmie Pass area - an area identified as a Connectivity Emphasis Area in the Snoqualmie Pass Adaptive Management Area Plan and critically important for wildlife movement (USFS 1997).

From 2000-2004, The Cascades Conservation Partnership (TCCP) raised nearly \$16 million in private donations and \$68 million in public funds to protect nearly 45,000 acres of forest lands from logging and development and reduce habitat fragmentation. Recently, our partners secured the final \$12 million from Congress needed to complete decades of work to protect critical lands and waters along the I-90 corridor in the Central Cascades.

Through the I-90 Wildlife Bridges Coalition, we led efforts to reconnect Washington's north and south Cascades by protecting and restoring habitat and establishing safe wildlife crossings under and over I-90. We worked with the Washington Department of Transportation (WSDOT), elected officials and community allies to make a critical 15-mile stretch of freeway safer for both people and wildlife by building wildlife undercrossings and overcrossings. From a wildlife perspective, these are ecological movement corridors that help maintain genetic diversity, and connect food, water, shelter and space needed for long term survival, especially as species adapt through a rapidly changing climate.

Today we continue to monitor wildlife movement in the Snoqualmie Pass East Project area through our Community Wildlife Monitoring Program, restore fragmented and degraded habitat in adjacent watersheds through our Central Cascades Watershed Restoration Program, and advocate for land uses that are compatible with wildlife needs and movement. The vision is any number of species can move through these spaces and find all that they need in the environment to thrive.

The Gold Creek Valley Restoration Project is the next logical step in repairing past ecological harm done from a legacy of old growth logging and human alteration of the ecosystem. We support this projects proposal to address the long-term unraveling of the aquatic functions in the Gold Creek Valley and repair the aquatic processes and functions and riparian habitats for other wildlife species at this critic high elevation connectivity point in the Cascades. This area has had many investments in wildlife and habitat connectivity over the years - restoring the habitat functions and processes in this valley makes meaningful effort to repair and mitigate past management activities that negatively impacted the ecosystem.

This project is critical to improve both wildlife and fish habitat and looks to integrate human uses of the area in sustainable ways that minimize collective negative impacts on habitat. We provide the following comments specific to each of the proposed three implementation activities.

Instream and Floodplain Restoration

We support a phased approach that would sequentially restore and improve the creek channel and floodplain as

funding is made available.

Gold Creek Instream Channel Restoration

River 0.5 - 0.9 The hydrologic reconnection of Gold Creek pond, an old gravel barrow pit, would have substantial positive effects of both repairing the groundwater and reconnecting the Gold Creek channel to its floodplain. The man-made berm and depth of the artificial pool has led to a year-round outflow that pulls groundwater for the neighboring area, dewateres the creek upstream of the location and disconnects any migrating fish from the creek. We strongly support the restoration of existing conditions to a more ecologically functional vegetated wetland with a connected channel to Gold Creek. A more ecologically functioning wetland with aquatic vegetation would begin to repair the processes that take so long to recover and rebuild hydric soils that wetland obligate plants depend upon. We support robust native plantings and revegetation of site and condition specific species.

RM 0.9 - 2.0 Due to the unravelling and widening of the stream channel from historic removal of large wood anchors and heavy logging to the rivers edge we see the need to create a narrower channel and add back in the complexity of engineered log jams. If possible, incorporate intact root wads to add complexity to the stream, to mimic natural cover habitat for fish and help create climate resilient refugia for bull trout.

RM 2.0 - 3.0 Prior practices of old growth logging and removal of large and down wood in the river and floodplains need to be addressed. Large logs served the purpose of anchoring the stream channel and creating large deep holes and complexity throughout the stream channel for fish to use as refuge and cover. With these essential habitat components removed the creek bank and channel became wider and oversimplified. We support the necessary restoration components of Engineered Log Jams (ELJs) to add back in this missing complexity, help anchor the stream channels and add back in deep pools of cold water refugia throughout the summer.

Some outward-facing educational signs, possibly at the creek overcrossing on the frontage road would help to inform the public about the changes they would be seeing over the course of the project implementation.

Restore Groundwater Hydrology

We acknowledge that the Gold Creek Pond, what was once a gravel borrow pit, has lost many of the diverse habitat functions that it once had as a forested wetland mosaic. The proposed restoration will restart the clock by addressing the core issue of repairing the hydrologic processes. The proposed net gain of over 45 acres of wetlands within the project area will provide more diverse native wetland ecosystems and habitat for amphibians, waterfowl, and other wildlife. The wetland soils and processes can take many years, if not decades to properly recover from past human activities. As we've observed 50 plus years after the gravel pit was created the compacted gravel and nutrient devoid soils do not support native vegetation, the areas surrounding the pond are barren of many native plants that should exist in a naturally functioning wetland ecosystem. What exists now is are many invasive plants that thrive at impacted sites, the pond is devoid of wetland obligate species and biodiversity. We do ask for the proposal to include and address proven methods to help restart and successfully establish wetland obligate species without the nutrient rich layers of wetland soils that take many years to establish.

Monitor and Improve Passage Conditions in Gold Creek

Public vehicle accessing the Gold Creek Channel when the reservoir is drawn down has negatively impacted the sensitive aquatic habitat and critical bull trout populations which depend on this area. While many in the local community may respond to this component of the proposal that their access is being taken away, the need to drive into the reservoir and drive vehicles through the creek is not a privilege or a right of the public. Public access to the boat ramp looks to be still maintained, however some clarity around winter access may be needed. We know that maintaining access to the boat launch is important to the public, but driving illegally into the reservoir and damaging sensitive fish populations and stream habitats is not something that should continue. The public can still access these areas for recreation, with a little extra access to walk to these recreational

opportunities on foot.

Thank you for the opportunity to support this project that will improve habitat for fish and wildlife and restore a vibrant and vital wetland ecosystem in the iconic Snoqualmie Pass area of Washington State.

Laurel Baum
Central Cascades Conservation Associate
Conservation Northwest
1829 10th Ave W, Suite B
Seattle, WA 98119

Cc' Jen Syrowitz;