United States Department of the Interior

FISH AND WILDLIFE SERVICE

Washington Fish and Wildlife Office

Central Washington Field Office
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Hydrologic Unit Code: 17-03-00-01-01 (Upper Yakima)

Rachel Lipsky, South Zone Environmental Coordinator
Mt.Baker-Snoqualmie National Forest
902 SE North Bend Way
North Bend, WA 98045

Dear Ms. Lipsky:

The U.S. Fish and Wildlife Service (Service) supports the Gold Creek Habitat Assessment Special Use Permit project (Project). The Project, if approved, would issue a special use permit to the Kittitas Conservation Trust (KCT) to allow KCT to perform a hydrological assessment, including experimental elevation of the water level, of Gold Creek Pond. This project will extend the previous assessment work to further assess causes of seasonal dewatering and habitat degradation in Gold Creek that currently limit use and access by the local population of bull trout (*Salvelinus confluentus*) and other fish species.

Bull trout were listed as "threatened" under the Endangered Species Act in 1998, and Gold Creek was designated as critical habitat for bull trout in 2010. Key functions of Gold Creek critical habitat include providing connectivity, passage, and other habitat features to support foraging, migration, spawning, and rearing of bull trout. The Service's 2002 Draft Bull Trout Recovery Plan and the Draft 2012 Yakima Basin Bull Trout Action Plan describe recovery actions for the Gold Creek local population of bull trout and other local populations in the Yakima Basin. One recovery action in these plans is to determine the causes of channel dewatering in Gold Creek.

The proposed hydraulic assessment is essential to understanding what effective restoration and recovery projects might look like in Gold Creek. Understanding the hydrology and fluvial processes of Gold Creek has been recognized as an important conservation need prior to the Service's Draft 2002 Bull Trout Recovery Plan. There has been much uncertainty, speculation, and debate about what factors might be responsible for currently degraded conditions. This uncertainty, combined with high risk associated with the declining status of the Gold Creek bull trout population, and the lack of key

habitat information, have resulted in reluctance to take actions that could inadvertently make matters worse. By increasing our understanding of underlying processes responsible for current conditions, this proposal will increase our confidence in proposed restoration solutions. The Service is specifically interested in understanding the linkages between the Pond and the stream flow in Gold Creek and how the seasonal flows can be improved to maintain habitat connectivity for spawning and rearing bull trout.

This Project proposes to authorize KCT, by Special Use Permit, to mimic the effect of raising the groundwater level in Gold Creek Pond to determine if raising the water level in in the Pond will create an overall increase in groundwater and surface water elevations up-gradient. Measuring the magnitude of the increases and determining if they are sufficient to restore surface flow within the dewatered reach of Gold Creek is the primary goal of the experiment.

KCT proposes to use hand tools to construct a dam at the outlet of the Pond and to monitor the water levels through an existing water surface elevation monitoring array. The Service feels that it is important to insure that the monitoring occurs through the summer and fall (June –November) to capture the most important changes in ground water that are important for bull trout spawning and rearing.

The Project also proposes to place a Denil fish ladder to allow for fish passage while the proposed dam is in place. Given that passage into the pond has previously been restricted, and the pond might be an unfavorable environment for juvenile bull trout due to the potential presence of non-native species or altered food webs, we suggest not constructing the Denil ladder. We understand that this may appear to be an unusual suggestion in the context of constructing temporary dams in fish bearing waters, but we anticipate that passage of bull trout into the Pond would result in more negative impacts than preventing passage at the proposed temporary dam. We'd be happy to discuss this suggestion in more detail with you and other partners on the Project.

This Project capitalizes on two existing partnerships of public and private entities promoting aquatic habitat restoration in the upper Yakima watershed. The first partnership was developed by the Washington State Department of Transportation around the I-90 Snoqualmie Pass East Project. This partnership has implemented major habitat preservation actions in the Gold Creek drainage and provided opportunities for improved floodplain function near the mouth of Gold Creek. The second partnership is associated with bull trout recovery planning in the Yakima Basin. This partnership has prioritized completion of the type of assessment described in the KCT proposal. Both of these partnerships have an impressive record of conservation success. The U.S. Forest Service, a key participant in both of these partnerships, is simultaneously completing plans for extensive restoration actions in the Upper Yakima basin and Gold Creek drainage. In addition, there is extensive planning occurring with the Yakima Basin Integrated Plan (YBIP) for water resources, which involves many of the same partners. By working with these partners, the KCT will ensure that the proposed assessment will provide the information needed to design effective restoration that meshes well with ongoing activities.

The Service has invested heavily in bull trout recovery in the Upper Yakima basin. We have provided funding to partners for purchasing land, provided for bull trout redd surveys, and funded KCT's assessment with recovery money from our Western Washington Fish & Wildlife Office and our Central Washington Field Office. Our Mid-Columbia Fisheries Resource Office, Yakima Sub-office and Washington Fish & Wildlife Office have also provided technical assistance on the hydraulic assessment. And many staff members have been engaged in the YBIP, which one objective is improvement of conditions for the isolated bull trout population that spawns in Gold Creek, which is among the most urgent endangered species issues that remain to be addressed in this area. We support this Project and look forward to implementing restoration measures that result from it.

Thank you for your assistance in the conservation of listed species. If you have any questions or comments regarding this letter, please contact Judy Neibauer at the Central Washington Field Office in Wenatchee at (509) 665-3508, extension 2003, or via e-mail at judy_neibauer@fws.gov.

Sincerely,

For

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