



File Code: 1920

Date: November 20, 2009

Mr. Derek Sandison  
Central Regional Director  
Department of Ecology  
15 West Yakima Avenue, Suite 200  
Yakima, WA 98902-3452

Dear Mr. Sandison:

The Okanogan-Wenatchee National Forest encompasses much of the upper Naches River Drainage and the entire area of the existing pool and proposed enlargement of Bumping Lake as now being considered by the YRBWEP. The National Forest System encompasses numerous and varied resources managed under a multiple use conservation mandate. The Forest Service has stewardship responsibility for maintaining the integrity and productivity of these lands for both tangible and esthetic values. Clean, abundant water; wildlife and fish habitat; livestock forage; forest products and recreation opportunities are all part of our mission. With this in mind, we wish to formally express our perspective on the proposed modifications to the Bumping Dam.

We enthusiastically support the re-establishment of fish passage over Bumping Dam. As fish habitat managers and partners with the Washington State Department of Fish and Wildlife, providing improved access to suitable habitat above Bumping Dam would potentially benefit the restoration of historic anadromous fish populations that have long been absent in and above the lake.

Enlarging the dam and reservoir has several potentially adverse effects on National Forest resources and facilities. Raising the pool's elevation would flood considerable existing forest area, some of which is identified as suitable habitat and may impinge upon a portion of a Critical Habitat Unit (CHU-WA 15) for the federally protected Northern Spotted Owl. Removal or inundation of this habitat could also have an adverse effect on those species that depend upon similar conditions. Deer, elk and numerous other wildlife species, including uncommon invertebrates, inhabit this area during various stages of their life histories. Flooding of normal use areas and travel routes could have an adverse effect on them, especially those with limited mobility.

High quality spawning and rearing habitat of threatened bull trout would be irreparably lost by the inundation of lower Deep Creek. Under the 458 KAF alternative, up to 40 percent of the accessible habitat in Deep Creek would be severely degraded and become non-productive. The bull trout population using Deep Creek is the third largest bull trout population in the Yakima River Basin. Permanent loss of pristine spawning and rearing habitat in Deep Creek would cause significant setbacks in recovery goals for Columbia River bull trout.

The expansion area has a high potential for the presence of rare plants and plant communities. For example, the upper Bumping River drainage is one of the few places on the District that supports large western red cedar trees and related mesic forest communities uncommon to the east slopes of the Washington Cascades.

Historic and pre-historic cultural properties would be adversely affected. A number of features related



to the construction of the original dam, historic structures and pre-settlement sites and artifacts would be inundated by the expansion. The historic structures are privately owned cabins on National Forest System lands authorized by recreation residence permits. With a very few exceptions, most of them were constructed well over 50 years ago and are potentially eligible for listing on the National Register of Historic Places. In addition to their historical value, these cabins have considerable intrinsic value to their owners and families.

We are also concerned about other facilities and improvements that are either within the footprint of the proposed expansion or would have their access cut off by the expanded pool. The 15 cabins referenced above and the Bumping Lake Marina operating under Special Use Permits on the north shore, two Forest Service campgrounds and a picnic area and boat launch ramp and numerous undeveloped camping sites on the south shore would be inundated. Given the proximity of the William O. Douglas Wilderness boundary to the new reservoir level, it is highly unlikely that a comparable replacement location on Bumping Lake could be provided for these facilities. Important recreation opportunities would be lost.

The current location of Forest Service Road 1800 would be inundated from the new dam location upstream for several miles. This in turn interrupts current motor vehicle access to Forest Roads 1808 and 1809 and the popular trailheads that serve hikers and equestrians using the William O. Douglas Wilderness. Admittedly, these trailheads are maintained to a rustic standard, but a recent analysis addressing restoration of motorized access to these areas revealed very strong public support for the proposal to repair flood damaged roads. We are currently seeking funds to build two bridges to accomplish that. A significantly enlarged pool makes it highly unlikely that acceptable alternate routes to these destinations would be feasible

Reduced access also complicates our ability to provide fire protection in the affected area. Without the ability to readily employ mechanized equipment, fires would have the potential for larger growth and more severity when compared to the current access.

In fairness, the lands and resources above the proposed reservoir level could experience some benefits. Reduced access would likely also reduce the effects of human activity on the affected landscape. Biotic communities that prosper under low disturbance regimes would be expected to prosper. Likewise people who enjoy solitude would have an enhanced opportunity to experience fewer encounters and evidence of human activity upstream of the reservoir pool.

On balance, we believe the proposed increase in water storage capacity at Bumping Lake has more negative effects on the resource and uses of National Forest System lands than benefits.

Thank you for the opportunity to comment on these proposals. As the agency with stewardship responsibility for these public lands, we hold a keen interest in this process and request that we be appropriately involved as your deliberations proceed.

Sincerely,

*/s/ Randall D. Shepard*  
RANDALL D. SHEPARD  
District Ranger