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Date: October 2, 2006

Ms. Patty O'Toole
Program Implementation Leader
Northwest Power and Conservation Council
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Portland, OR 97204

2006010042

Dear Ms. O'Toole,

I have recently read a copy of the Independent Scientific Review Panel's (ISRP) review and findings on a project proposed for Bonneville Power Administration (BPA) funding starting in 2007. The project number is 200724600 - Restoration of bull trout passage at Albeni Falls Dam using a trap-and-haul approach in conjunction with investigations to assess effectiveness of rapid genetic analysis in assigning natal tributary. The project proposes to use electrofishing and a temporary trap and haul system for the capture of bull trout below Albeni Falls Dam. The project also proposes the genetic analysis for proper relocation of these entrained fish above the dam to their natal streams and the radiotagging of these bull trout to determine their movements.

The final recommendation of the ISRP is to fund the electrofishing portion of this project and conditionally fund the temporary trap and haul system if the electrofishing effort yields 40 + bull trout adults. However, *"the ISRP believes that at this time the idea of volitional migration following assisted dam passage is sufficient without the genetic assignment to natal streams coupled with radio-telemetry"*. The ISRP has recommended not funding the genetic analysis because it is unclear *"whether the genetic samples and assignment methods are sophisticated enough to assign the natal river with sufficient accuracy."* The ISRP has also recommended not funding genetic analysis and radiotagging with the observation *"That fish can be collected, genotyped, and tracked to a spawning location is an interesting observation, but not really a biological end-point."*

The rationale for the recommendation of the ISRP is understood. However, I would urge the ISRP to reconsider its recommendation, eliminate any funding condition and fund the complete proposal for the following reasons:

Trap and haul is necessary to determine what portion(s) of the tailrace the fish are utilizing, when they are utilizing it and during what flows. This is important data for the future location and design of upstream volitional fish passage at the dam which is required in the US Fish and Wildlife Service's 2000 Biological Opinion. This data collection should not be delayed or eliminated from the project proposal by making the funding for trap and haul conditional upon the collection of 40+ bull trout adults through electrofishing over one year. Any delay in this data collection will subsequently delay the provision of volitional upstream fish passage for bull

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trout at the dam. It will also prolong the continued entrainment and loss of spawning age adult bull trout from threatened subpopulations above the dam.

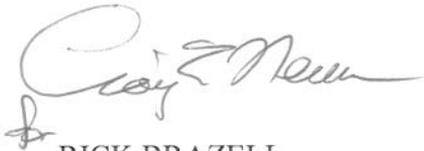
Previous studies by the Battelle Corporation and Eastern Washington University in 2003 and 2004 have found 13 adult bull trout below the dam. Genetic analysis, by Washington Department of Fish and Wildlife geneticists, of 9 of these fish indicate that a majority are most genetically similar to a very small subpopulation of migratory bull trout that use the lower Priest River tributaries for spawning and rearing. Genetic analysis is not just important to ensure proper relocation of adult bull trout. It is also important to determine how much of a threat entrainment poses to each subpopulation above the dam. This information is essential for the recovery of these subpopulations. In addition, all fish recently caught and genetically analyzed have been adults. One objective of this project is to determine if subadults are being entrained over or through the dam. If subadults are captured, it is important information to know where these fish are coming from as well as when they are captured.

Radiotagging fish may not be a "*biological endpoint*". However, it is important for the following reasons:

1. To determine where and when these fish are rearing and/or spawning above the dam. This information will validate or invalidate any genetic analysis linking a particular fish to a particular population.
2. It will allow biologists to further study fish and their specific habitat to determine any other risks or threats (non-native competition, barriers to fish passage, predation etc.). This is particularly important for subadult bull trout due to lack of information on this life stage.
3. Depending upon battery life, it will determine whether these fish become entrained again. It would determine when entrainment occurs, whether the fish are entrained through the turbines or over the spillway and, if the fish survives, allows recapture to determine any occurrence of injury.

If you have any questions concerning our involvement or position in matters pertaining to fish passage at Albeni Falls Dam, please contact Tom Shuhda, Forest Fish Biologist, at (509) 684-7211.

Sincerely,



RICK BRAZELL
Forest Supervisor