



United States Department of the Interior

FISH AND WILDLIFE SERVICE



*Upper Columbia Fish and Wildlife Office
11103 East Montgomery Drive
Spokane, Washington 99206*

October 5, 2006

2006010043

Mr. Mark Walker
Director of Public affairs
Northwest Power and Conservation Council
851 S.W. Sixth Avenue, Suite 1100
Portland, OR 97204

Subject: ISRP Comments and Recommendations on Bull Trout Passage at Albeni Falls Dam Project (#200724600) and Pend Oreille Nonnative Fish Suppression Project (200714900).

Dear Mr. Walker:

The U.S. Fish and Wildlife Service (Service) appreciates the opportunity to provide comments on the draft fish and wildlife project funding recommendations to the Bonneville Power Administration for fiscal years 2007 through 2009. The Service is providing the following comments and biological information related to two project proposals that were submitted to the Northwest Power and Conservation Council by the Kalispel Tribe of Indians. These include the Bull Trout Passage at Albeni Falls Dam Project (#200724600) and the Pend Oreille Nonnative Fish Suppression Project (#200714900).

In brief, the ISRP determined to fund both of these projects in part, and provided reasoning for those aspects of the project that were "Fundable" and "Not Fundable". First, the ISRP determined that genetic rapid assessment and radio-telemetry work on bull trout passed above Albeni Falls Dam was not necessary; and second, the ISRP determined that the proposed action (strobe lights and trap netting) intended to benefit bull trout by suppressing lake trout in Upper Priest Lake are 20 years to late to benefit bull trout. We offer the following for your consideration:

Bull Trout Passage at Albeni Falls Dam Project

The ISRP stated the genetic assessment is unnecessary to establish the effectiveness of the pilot project, and may not be able to generate much usable information. Further, the ISRP did not give any specific arguments against conducting radio-telemetry work, other than to point out that the subsequent data would be "interesting, but not a biological end-point". The ISRP then suggested that the ultimate success of the pilot project could be established by redd surveys and juvenile trapping in the mainstem, and stated that where the bull trout specifically spawned isn't that important.

Long term, permanent passage at the dam is likely to require significant resources for a number of years. Because of the resources required, the Corps of Engineers is conducting an extensive feasibility study. In addition, bull trout currently entrained over the dam are most likely killed by the

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lethal water temperatures in the Pend Oreille River below Albeni Falls Dam during the summer months. This constitutes the potential for a yearly lethal take of bull trout. Should any fish below the dam find thermal refugia and survive, they are lost permanently from the breeding populations above the dam.

With the two above situations in mind, it is very important that experimental passage of bull trout over Albeni Falls Dam be as definitively linked to whatever improvements in bull trout numbers in tributaries above the dam as possible. The ISRP seems to understand the importance of establishing the benefits of experimental passage (by suggesting redd counts and juvenile monitoring), while disagreeing over how well we need to establish the existence of these benefits.

The ISRP points out that it is not clear whether genetic samples and assignment methods are sophisticated enough to assign the natal river with sufficient accuracy. The Service agrees that this technique is not perfect and cannot assign, with 100 percent certainty, the natal stream of an individual fish. However, it is our understanding through our work with the Idaho Department of Fish and Game that this assignment method has worked well for them on the Clark Fork River system, and that they have seen relatively little straying by fish that were assigned to an area above or below a certain dam. Furthermore, the Service, in coordination with the Washington Department of Fish and Wildlife, University of Montana, and the University of British Columbia, recently standardized the bull trout genetic markers used by their labs in order to provide reproducible analyses across the range of bull trout to assist in species recovery and management. This was accomplished by screening the microsatellite loci currently developed for bull trout to identify a core set of loci that all labs would use in the future.

Radio tracking of specific fish trapped below the dam to specific spawning areas above the dam would definitively demonstrate a direct biological benefit to the Pend Oreille River bull trout population, and would demonstrate that lethal take of bull trout is being minimized (or avoided). Simply noting an increase in redd numbers or downstream migrants could potentially be argued to be the result of other efforts, including improved conditions in Lake Pend Oreille (more kokanee, lake trout eradication), habitat improvement efforts in spawning areas (removal of barriers), more thorough monitoring efforts, or other factors. Direct documentation of individual fish being passed above the dam and migrating to spawning areas would be an irrefutable demonstration of the benefits of fish passage. This would give greater impetus and a greater sense of urgency to efforts to provide permanent, long-term passage at Albeni Falls Dam. Additionally, radio-tagging of individual fish will aid in future trapping efforts below the dam, by more effectively targeting habitats used by these fish, assuming they are entrained to below the dam.

Pend Oreille Nonnative Fish Suppression Project

The ISRP questioned whether bull trout in the lake are already beyond recovery and provided information on the status of bull trout in Upper Priest Lake. The Service position is that we are continuing with bull trout recovery efforts in Upper Priest Lake, and we do not agree that this population of bull trout is beyond recovery. Furthermore, the Service feels that the information provided by the ISRP to come to their conclusion is incomplete. The ISRP stated:

The 1999 population estimate was 116 adults, with no juveniles being caught. In 2002, the fifth year of gillnetting to remove lake trout, the "situation appeared to worsen for bull trout" when 836 lake trout were netted and the ratio of lake trout to bull trout in the nets was 93:1. In the absence of more recent evidence to the contrary from the project sponsors, coupled with reviewers' experience with the dynamics of lake trout predation, the ISRP must take the

position that, while the activities proposed are in good faith and lake trout assuredly pose a serious problem, the actions are being proposed 20 years too late to benefit bull trout.

We provide the following data to give a more complete assessment of the success of the lake trout removal efforts: In 2003, a total of 255 hours of gill netting was accomplished resulting in 571 lake trout being removed from Upper Priest Lake. During the June effort, the lake trout to bull trout ratio was 89:1, while the ratio for the August was 28:1; total for the year was 571 lake trout/14 bull trout or 41:1; the catch per unit effort was 0.98 lake trout per hour per 100m² of net. For 2002 (four efforts totaling 372 hours), 807 lake trout and 9 bull trout were caught for a 90:1 ratio; the catch per unit effort was 1.02 lake trout per hour per 100m² of net. For 2001 (three efforts totaling 121 hours), 471 lake trout and 7 bull trout were caught for a 67:1 ratio; the catch per unit effort was 1.8 lake trout per hour per 100m² of net.

While the ratio of lake trout to bull trout ratio is one means of looking at relative abundance, the Service does not feel that this accurately depicts the true ratio of these two species in Upper Priest Lake. While some habitat overlap occurs in the lake, bull trout and lake trout generally utilize different areas in the lake. Netting was avoided in areas utilized by bull trout, and areas known to support lake trout are heavily netted, resulting in a bias toward a higher lake trout ratio (Ned Horner, IDFG, pers. comm. 2006). We did not summarize recent years data, as lake trout netting techniques have changed and would not be comparable. However, it should be noted, that a general observation over the last few years during lake trout removal activities, is that more young or subadult bull trout have been captured than in the early years of these efforts (Horner, pers. comm. 2006). The Service feels that this is a positive sign and can lend support for the success of these efforts.

This year, the Service provided additional funding to the Idaho Department of Fish and Game to continue intensive lake trout removal efforts which included deepwater trap netting. Data on these efforts is not yet available, but techniques continue to be refined as activities occur to increase the success of the current lake trout removal efforts. The Service will continue to support these efforts in subsequent years and will move forward with additional activities and programs throughout the subbasin aimed at recovering bull trout. We acknowledge that the Upper Priest Lake population is precariously low, but also point out that the numbers have remained relatively stable, cycling up and down for over a decade, with an average of 35 redds per year since bull trout were listed 1998. Also, in our geographic management area, we are aware of bull trout populations in the St. Joe River, lower Priest River, and Little North Fork Clearwater River subbasins that have experienced similar dramatic declines and are as well at risk of extirpation. However, restoration and recovery activities continue in these area and bull trout redd counts this year have increased by two to three fold in index streams combined as compared to redd counts just five or six years ago. We remain optimistic that with the reduction of lake trout in the Upper Priest Lake subbasin, a similar increase in bull trout redds would occur, as the habitat is suitable.

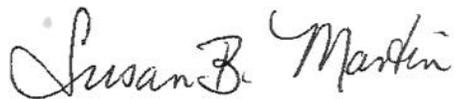
The ISRP also stated that "in the original proposal there was not convincing evidence put forth that either the deepwater trap netting in Upper Priest Lake, or the employment of a strobe light in the Thorofare to deter lake trout reinvasion of Upper Priest Lake, had a reasonable chance for success (and for the effort to benefit bull trout, both those activities would need to be successful)." While the Service has less information as to the potential success of strobe lighting in the Thorofare, we feel that the pilot study conducted by the Idaho Department of Fish and Game about 4 years ago, showed great promise. In short, studies have found that lake trout were captured in gillnets in the Thorofare in the spring and fall, but not in July or August when temperatures exceeded 15 degrees Celsius. Greater than 90 percent of the lake trout captured over two years were caught at night. From September 23 to October 3, 2002, Idaho Department of Fish and Game conducted an experiment to determine if strobe lights would prevent lake trout movement through the Thorofare into Upper

Priest Lake. The results indicated that strobe lights repelled a minimum estimate of 75-80 percent of the lake trout that approached the strobe lights. This is considered a minimum estimate and the results may have been even better if fresh, unstressed fish were used for the experiment.

In summary, the Service believes it is important to fund all portions of these two projects so that potential take of bull trout in the Pend Oreille and Priest Lake systems is minimized, and that bull trout in these areas contribute to the recovery of the species throughout their range. This funding is necessary to show that fish passed above Albeni Falls Dam do indeed migrate to spawning areas and contribute to recovery. This information will help support the need for long-term, permanent volitional fish passage at Albeni Falls Dam, and most importantly, the need for it to be in place as quickly as possible.

For these reasons, the Service strongly supports funding the full Restoration of Bull Trout Passage at Albeni Falls Dam project (#200724600), including the rapid genetic analysis and radio telemetry portions; and the Pend Oreille Nonnative Fish Suppression Project (#200714900), including deepwater trap netting and Therofare strobe lights. If you have any questions, you can contact Scott Deeds or Jason Flory of my staff at (509) 891-6839.

Sincerely,



Supervisor

C: Kalispel Tribe (Maroney)
USFS (Shuda)
USACOE (Lewis)