PRWG
PRIEST RIVER WATERSHED GROUP

Washington Department of Fish and Wildlife
2315 North Discovery Place
Spokane Valley, WA 99216-1566

June 10, 2024

RE: Sullivan Lake bull trout introduction

To whom it may concern -

We are writing to provide preliminary comments and suggestions regarding the initiative to introduce bull trout into Sullivan Lake and Harvey Creek. Thank you for the opportunity. The Priest River Watershed Group (PRWG) supports efforts to restore bull trout populations in the Pend Oreille Basin. We look forward to submitting specific comments after a detailed plan is available, and also plan to provide comments responding to the draft Environmental Assessment, scheduled for later this year.

The PRWG is a local collaborative of diverse interests committed to protecting, maintaining, and improving the health and integrity of the Priest River watershed. Supporting local, native, cold-water fish populations is of critical importance to the PRWG. To learn more about the PRWG and view the steering committee membership, please visit www.priestriverwg.org.

The Sullivan Lake bull trout introduction initiative, presented by the Washington Department of Fish and Wildlife, the US Fish and Wildlife Service and the Kalispel Tribe of Indians, would introduce or reintroduce bull trout into Sullivan Lake and Harvey Creek. These comments are focused on the proposed actions that have potential to either adversely or positively impact fisheries in the lower Priest River Watershed, as well as suggestions we hope you will consider as the detailed plan is developed for the draft EA.

Re-establishing populations of bull trout and restoring connectivity throughout the Lower Clark Fork Geographic Region of the Columbia Headwaters Recovery Unit is essential to the health and sustainability of bull trout populations into the future. Harvey Creek and Sullivan Lake are excellent sites for a trial run of establishing a new population.

The Lower Priest River has over 15 notable tributaries entering over its 45-mile length, but over the last 40 years, bull trout spawning has been documented only in the East River, North Fork East River and Uleda Creek, a tributary to the East River. Redd counts in the East River watershed have averaged about 35, total, annually over the last decade, with a mildly declining trend over the last 22 years. Increasing summer water temperatures and decreasing flows in the Lower Priest River seem likely to negatively impact this local population. Further, the East River watershed includes sections that are designated as impaired under the Clean Water Act, where there are Total Maximum Daily Loads (TMDL) for temperature and sediment. Both Lower Priest River and East River watersheds are

impacted by sediment, in part from existing roads, logging and roadbuilding.

The Lower Priest River is experiencing very warm summer water temperatures, and some years the temperature rises above 27°C without any temperature gradient observed in the deep pools that would create fish refuge. Records from over a hundred years of data collected at the Priest River Experimental Forest show that there are currently 20 more frost-free days than in the early 1900s, and the March 1st Snow Water Equivalent (SWE) has decreased over 30% since 1937. In the last six years, high air temperature records have been broken in June, July, August and December. Peak runoff occurs, on average, 19 days earlier than it did fifty years ago. These environmental trends support our concern that warmer water temperatures and decreasing flows are likely occurring in the summer on the Priest River. As a result, it is evident this bull trout population has many challenges reaching the East River and successfully spawning. These challenges continue to persist and increase due to climatic changes and unnatural flow regimes on both the Pend Oreille and Priest Rivers.

The consensus of our group is that collecting bull trout or fertilized embryos from the East River, which is designated as bull trout critical habitat, could be detrimental to an already-stressed population. We suggest collection efforts exclude the East River watershed and be focused on the other proposed streams; the tributaries to the Lake Pend Oreille system which have more ideal conditions and stable redd counts.

The Priest River Watershed Group (PRWG) supports the proposal to introduce bull trout into Sullivan Lake and Harvey Creek as an important step towards the recovery of bull trout populations in the Lower Pend Oreille subunit. Please consider our concerns about removing bull trout of all life stages from the East River. We look forward to contributing detailed comments and suggestions as the plan develops and the draft Environmental Assessment is released.

Thanks you for your consideration,

Priest River Watershed Group steering committee

cc:

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