Sullivan Lake proposed Bull Trout introduction Summary of public comment 06/10/2025

Background:

Staff reviewed comments regarding the proposed introduction of Bull Trout into Sullivan Lake (Pend Oreille Co.) collected during the public comment period (April 1-June 15, 2024). Seventy-five comments were received. Of those, 19 were supportive of the proposal, 37 were opposed, 10 were neutral (did not express support or opposition), and 9 were not applicable (these consisted of spam received via email, subject matter did not apply, or the same comment received in multiple ways, e.g., via both email and comment portal, so was only counted once). After removing non-applicable comments, 29% supported the proposal, 56% were opposed, and 15% were neutral (Figure 1). Twenty-nine comments were confirmed from local (northern Pend Oreille Co.) constituents. Eighty-three percent of local comments opposed the proposal and accounted for 65% of the total opposition. Similarly, comments for which residency was not identified predominantly opposed the proposal (57%), while 33% were in support and 10% were neutral. Conversely, non-locals generally supported the proposal (59%) or were neutral (35%). A summary of comment sentiment (support, oppose, or neutral) by location of residence is provided in Figure 2.



Figure 1. Summary of public comment on proposed introduction of Bull Trout into Sullivan Lake.



Figure 2. Summary of public comments on proposed introduction of Bull Trout into Sullivan Lake sorted by location of respondents' residence (Local refers to northern Pend Orielle County, Non-Local refers to all other locations of residence, Unknown refers to responses that did not identify residency).

Comments in support of the proposal:

Staff evaluated the 19 comments in support of the proposal. Two (10%) were from local (northern Pend Oreille Co.) constituents, 10 (53%) were from non-locals, and 7 (37%) were from individuals with unknown residency. Reasons for support included:

- 1. Additional angling opportunity.
- 2. Production of Bull Trout broodstock for future conservation efforts.
- 3. Sullivan Lake habitat conducive for Bull Trout.
- 4. Bull Trout native to northeast Washington and Pend Oreille drainage.
- 5. Contributes to Bull Trout recovery.
- 6. Would improve Kokanee fishery.
- 7. Cultural importance.

Next, staff examined the 37 comments expressing opposition to the proposal for common themes to determine which issues were of greatest concern to the public. Analysis consisted of reviewing comments opposed to the proposal and composing a succinct summary of each. Staff recognize that this

process leaves room for subjectivity but believe that the merit of this approach outweighs its shortcomings. Comment summaries were then used to produce a word cloud of the top 20 words (minus removals of words such as "a", "an", "the", etc.). From the word cloud, specific categories of concern were apparent, and common themes were identified:

- 1. Fishing opportunity/Ecosystem impacts
- 2. Government involvement/overreach
- 3. Lake access restriction or closure
- 4. Negative impact to local community/economy
- 5. Endangered Species Act (ESA) concerns
- 6. Bull Trout non-native to Sullivan Lake (introduction vs. reintroduction)
- 7. Not fiscally responsible
- 8. Don't like Bull Trout
- 9. Removal of Sullivan Lake Dam/Fish passage requirement
- 10. Outcome uncertain
- 11. Water level management

Most opposing comments reflected multiple themes (Figure 3). Concerns regarding "Fishing opportunity/Ecosystem impacts" were cited most commonly (68%; 25 of 37), followed by those related to "Government involvement/over-reach" (38%; 14 of 37), and "Lake access restriction or closure" (32%; 12 of 37). Concerns regarding "Negative impact to local community/economy", "ESA concerns", "Bull Trout non-native to Sullivan Lake (introduction vs. reintroduction)", and "Not fiscally responsible" were each themes in 22% (8 of 37) of opposing comments, while the remaining themes occurred in 5-11% (2-4 of 37) of those comments. Staff drafted responses to opposing comments, addressing concerns and providing additional relevant information.





Comments in opposition to the proposal and project proponent responses to concerns:

1. Fishing opportunity/Ecosystem impacts

Many of the opposing comments (68%; 25 of 37) expressed concern regarding the potential for loss of angling opportunity if Bull Trout were introduced into Sullivan Lake (e.g., due to impacts of Bull Trout on other fish species within Sullivan Lake or increased fishery restrictions) and/or doubt that Bull Trout would produce a fishery or harvest opportunity.

Consistent with current Washington State fishing regulations and Federal ESA regulations, Bull Trout can be caught by anglers but must be released (with few exceptions for specific waterbodies). Therefore, introduction of Bull Trout would not result in additional fishing restrictions and regulations for Sullivan Lake. However, if the proposed introduction were to successfully establish a self-sustaining population, it might also allow for future harvest opportunities, which would then require changes to the current ESA 4(d) rule for Bull Trout to be implemented. Changes to the 4(d) rule could be specific to Sullivan Lake, or part of a larger range-wide revision of the rule being considered to allow for more targeted Bull Trout fisheries where appropriate. A modest expansion of the seasonal angling closure of Harvey Creek (i.e. move closure date from Oct. 31 to Labor Day) to

protect spawning Bull Trout would be likely, which would be regulated by WDFW and clearly defined in the fishing regulations.

Some comments expressed doubts about whether a targeted Bull Trout fishery is achievable, which the proponents acknowledge and understand. A harvest fishery is not guaranteed, but it is a primary objective of this project. Regardless, catch-and-release fishing for Bull Trout would be allowed in Sullivan Lake, and because adult Bull Trout can reach lengths in excess of 30 inches and weights over 15 lbs, potential would exist for a trophy catch-and-release fishery.

A fairly high proportion (30%; 11 of 37) of comments expressed concern about the potential for negative impacts of Bull Trout on the Kokanee population in Sullivan Lake via predation. Kokanee are not native to Sullivan Lake, but they have been present since at least 1913 (Washington State Chief Game Warden Annual Report 1916) and currently comprise the primary fishery. Growth of Kokanee in Sullivan Lake is slow due to low productivity of the lake and density dependence. Generally, Kokanee growth is lower when abundance is high and vice-versa (faster growth and increased length-at-age at lower abundance). Kokanee in Sullivan Lake typically reach maximum lengths of 9-10 inches as adult spawners (WDFW unpublished data), offering an adequate, but somewhat lower quality fishery than the WDFW Region 1 standard (adult spawner lengths ≥ 11 inches).

If Bull Trout were introduced into Sullivan Lake, adults would undoubtedly utilize Kokanee as a prey base, and predation would decrease Kokanee density. Because Kokanee are density-dependent, a reduction in abundance would likely result in a modest increase in growth rate and corresponding length-at-age, resulting in larger Kokanee available to anglers. Larger Kokanee recruit more readily to the creel than similar-aged smaller fish (Rieman and Maiolie 1995) and are generally more attractive to most anglers.

Kokanee inhabiting Sullivan Lake are of Whatcom-stock origin (a stock of Kokanee native to Lake Whatcom, WA, which has been stocked throughout much of the western U.S. and is still used to supply fish for lowland lake stocking throughout the state), periodic restocking of Kokanee could be employed as a management tool to ensure adequate abundance to maintain the fishery. Monitoring of the Kokanee population (mean length-at-age and/or relative abundance) would provide managers necessary information to inform if and how often Kokanee should be stocked. Determination of the number and size of Kokanee at stocking would be informed by strategies employed at other stocked lowland lakes within WDFW Region 1 and literature review.

Eleven percent (11%; 4 of 37) of opposing comments reflected concern about ecosystem impacts resulting from Bull Trout introduction into Sullivan Lake. Specifically, worries about the impact of introducing an apex predator known to consume fish prey and the potential to disrupt the existing fish community were conveyed. Species of concern to commenters (aside from Kokanee which are discussed above) included native Westslope Cutthroat Trout and Pygmy Whitefish, as well as non-native Burbot. While Bull Trout feed primarily on other fish as adults, they also co-occur sustainably throughout much of their range with fish species found in Sullivan Lake. Brown Trout, which filled a similar niche, were historically stocked into Sullivan Lake. They feed primarily on fish as adults and can achieve a large body size (current state record caught in Sullivan Lake in 1965). Although Brown Trout were present in Sullivan Lake for decades, there was no discernible effect on other fish species.

2. Government involvement/overreach

Concern about government involvement and/or over-each was a common theme shared by 38% (14 of 37) of all opposing comments and 26% (9 of 34) of those from local residents. A number of negative experiences are inferred from these comments, including past land use and access closures by the Federal Government (interpreted to mean U.S. Forest Service; USFS) to protect habitat and/or ESA-listed or sensitive species, as well as a feeling amongst some in northern Pend Oreille County that they are forced to bear the burden of the regulations that are part and parcel to listed or sensitive wildlife species simply because they occur in the area in which they live. And, because this has been a consistent theme for many years and with various species ranging from Grizzly Bear to Caribou, they are not interested in adding (or increasing the abundance of) another ESA-listed species to the area. In addition, aside from restricted access, protections for some ESA-listed species have led to declines (either real or perceived) in beneficial use opportunities such as hunting due to predation. Wolf management is cited as a specific example.

In consideration of uncertainty and risks associated with Bull Trout introduction, this proposal has been carefully and rigorously developed over the past decade. Proponents contracted independent researchers to investigate the feasibility of reestablishing Bull Trout to the Pend Oreille River Basin (Dunham et al. 2014), which informed a decision analysis involving varied stakeholders to identify optimal locations and strategies to maximize adult abundance within 10 years (Benjamin et al. 2019), and a risk assessment for Bull Trout introduction to Sullivan Lake/ Harvey Creek (Hardiman et al. 2022). Benjamin et al. (2019) identified Sullivan Lake as the optimal location within the Lower Pend Oreille River Basin to attempt an introduction based on high-quality habitat (cold, clean, and connected waters), abundant forage and a compatible fish community.

The risk assessment was conducted to more fully understand the potential impacts and outcomes of Bull Trout introduction into Sullivan Lake (Hardiman et al. 2022). This assessment evaluated a variety of potential risks, including the potential for harm to donor source populations of Bull Trout, as well as likelihood of introduction of fish pathogens and impacts to other fish species in Sullivan Lake. All of the potential risks were considered low. However, a consistent monitoring program was recommended to allow for real-time evaluation of Bull Trout introduction. To address uncertainties and the potential for unintended consequences, the project proponents agree that a monitoring program is a key part of the implementation plan and that the details of adaptive management must be clearly conveyed to the public.

We recognize that the local community lacks trust in government agencies and understand the perception that introduction of an additional listed species could have negative impacts to locals. The role of government is multi-faceted, but at its core, it is intended to protect and maintain quality of life for its citizens. Specific to management of natural resources, government (State, Federal, Tribal) is charged with ensuring sustainable use, protection, and conservation (wise use). Conservation of native species can take many forms (e.g., habitat protection, prohibition or limitation of harvest, etc.). In some cases, beneficial use may be incompatible with conservation actions. However, in this case, proposed introduction of Bull Trout into Sullivan Lake is intended to expand the abundance and range of an ESA-listed species to aid in long-term recovery and delisting, while also providing for beneficial use (catch-and-release fishery with a longer-term goal of a harvest

fishery); a true win-win situation for the local community and the species. The WDFW, U.S. Fish and Wildlife Service (USFWS), and the Kalispel Tribe are committed to tailoring the proposed introduction of Bull Trout into Sullivan Lake to ensure that beneficial use is a key component and additional burdensome regulations are avoided.

3. Lake access restriction or closure

Thirty-two percent (32%; 12 of 37) of opposing comments expressed concern that introduction of Bull Trout into Sullivan Lake could result in lake access restrictions or closure to public access altogether. In short, introducing Bull Trout into Sullivan Lake would not result in lake access restrictions or closure to recreational activity. Boating and other water-related activities would be unaffected. The project proponents are unaware of any lakes closed to public access due to the presence of Bull Trout. Local perception of this risk may be driven by limitations to certain types of access (e.g., motorized vehicle access) which have been enacted by the USFS in the past to protect sensitive habitat (e.g., winter range) or wildlife species (e.g., Grizzly Bear). However, these access restrictions, typically implemented by gating or berming of roads to prevent vehicle access, are not transferable to lakes.

4. Negative impact to local community/economy

Twenty-two percent (22%; 8 of 37) of opposing comments cited concern over potential negative impacts to the local community or economy if Bull Trout were introduced into Sullivan Lake. Most concerns revolved around impacts to the existing Sullivan Lake fishery from Bull Trout predation (primarily on Kokanee) and associated impacts to tourism. While Kokanee provide the primary fishery in Sullivan Lake (95% of overall harvest), the quality of the Kokanee fishery is low due to small average size (9.2 inches) and low catch rates (0.2 Kokanee/hour; Nine and Scholz 2005). Thus, it cannot be characterized as a destination Kokanee fishery. That is not to say that anglers do not fish for Kokanee in Sullivan Lake. It is apparent from public comment that this is a valued fishery locally. However, the current value of the fishery to tourism is likely limited. According to creel survey data, 46% of anglers fishing Sullivan Lake were from Spokane County and 38% were from Pend Oreille County (Nine and Scholz 2005). Anglers traveling from other locations accounted for just 16% of creel interviews. Nine and Scholz (2005) also estimated angler effort at 11,235 hours (8.7 hrs/acre) annually and the value of the fishery at \$91,500 (\$150,000 in 2024 dollars). Direct comparison of these data to other waters is difficult, given that Bull Trout fisheries currently exist in only a handful of locations. However, Lake Billy Chinook, Oregon, supported 90,000 angler hours (22.5 hrs/acre) in 2011 with a similar fish assemblage and a Bull Trout harvest fishery. After accounting for size differences between the two waters, angler effort on Lake Billy Chinoook was 2.5 greater, demonstrating the potential economic benefit of a Kokanee/Bull Trout fishery. Even a catch-andrelease fishery would represent a unique opportunity in eastern Washington. Forty-two percent (42%; 8 of 19) of comments in support of Bull Trout introduction into Sullivan Lake listed additional or improved angling opportunity as a reason. Expenditures by out-of-area anglers for items such as gas, fishing tackle, lodging, etc., could be a net benefit to the local economy.

Several comments indicated that the cost to fund Bull Trout introduction or associated measures would be high or that funds could be put to better use. While Bull Trout introduction and monitoring would have costs, funding to conduct that work would not be required or requested from the local community. WDFW, USFWS, and the Kalispel Tribe would allocate funding to support the work. During the public meeting on April 17, 2024 in Metaline Falls, the project proponents stated that the proposal to introduce Bull Trout into Sullivan Lake would not affect ratepayers, and there are no plans to remove Sullivan Lake Dam or require fish passage at that location (see #8 below).

5. Endangered Species Act (ESA) Concerns

Twenty-two percent (22%; 8 of 37) of opposing comments expressed concern over introduction of an ESA-listed species due to potential for burdensome regulations. There would be no additional regulations for private landowners.

6. Bull Trout non-native to Sullivan Lake

Twenty-two percent (22%; 8 of 37) of opposing comments questioned whether Bull Trout were native to Sullivan Lake. Some pointed to the use of the word "introduction" vs "reintroduction" in the proposal as proof. As stated in the public meeting on April 17, 2024 in Metaline Falls, whether Bull Trout were historically distributed in Sullivan Lake is somewhat uncertain. However, a newspaper article from the early 1900's describes Sullivan Lake as having "a great number of char, or bull trout, which can be taken on the spoon" (Spokesman Review, May 29, 1910), so there is evidence to support their presence there at the time. And, Bull Trout were historically found throughout much of the lower Pend Oreille River watershed.

Regardless of whether Bull Trout are native to Sullivan Lake, they are compatible with the existing fish community. Most of the fish species present are native to the lake, but even those which are not, such as Kokanee and Burbot, are commonly found in waters occupied by Bull Trout. Therefore, the likelihood of Bull Trout introduction resulting in adverse effects to the Sullivan Lake fish community is low. Bull Trout typically occur at low densities, and the project proponents can find no examples of overabundant populations. It is unlikely that Bull Trout introduction into Sullivan Lake would result in harm to the fish community or the ecology of the lake.

7. Not fiscally responsible

Twenty-two percent (22%; 8 of 37) of opposing comments questioned whether introduction of Bull Trout into Sullivan Lake would be fiscally responsible. Several of those comments indicated that the cost to fund Bull Trout introduction or associated measures (e.g., some were concerned about whether fish passage would be required at Sullivan Lake Dam; see #4 above) would be high or that funds could be put to better use. While Bull Trout introduction and monitoring would have costs, funding to conduct that work would not be required or requested from the local community. WDFW, USFWS, and the Kalispel Tribe would allocate funding to support the work.

8. Removal of Sullivan Lake Dam/Fish passage requirement

Eleven percent (11%; 4 of 37) of opposing comments questioned whether Bull Trout introduction into Sullivan Lake might lead to other actions such as removal of Sullivan Lake Dam or a requirement of fish passage at that facility. Comments expressed concern that fish passage or removal of Sullivan Lake Dam would come at the expense of taxpayers or ratepayers (see #4 above) and that such actions would not be fiscally responsible (see # 6 above). The Pend Oreille PUD owns and operates the dam under special use permit from the USFS, without provisions for modification or removal of the dam in the foreseeable future. Impounded water (14,000 acre-feet) is stored and released for downstream benefits annually, with the value protected in long-term, durable agreements. Bull Trout passage at Sullivan Lake Dam is not required for the proposed introduction, and in fact, its presence would be useful in management of Sullivan Lake Bull Trout as a discrete population.

9. Don't like Bull Trout

Eight percent (8%; 3 of 37) of opposing comments noted dislike of Bull Trout. While the project proponents respect everyone's right to their own opinion, we hope that the information provided in the responses to opposing comments may alleviate some concerns about Bull Trout which contribute to this sentiment about the species.

10. Outcome uncertain

Five percent (5%; 2 of 37) of opposing comments expressed concern about the potential for uncertain outcome if Bull Trout were introduced into Sullivan Lake. While it's true that there are no guarantees regarding the outcome, this proposal has been given a lot of thought. Sullivan Lake is conducive to Bull Trout introduction in many ways, ranging from suitable habitat (cold, clean water), a compatible fish community, and historic presence within the Pend Oreille River basin. In fact, of all locations within the Lower Pend Oreille River basin, Sullivan Lake was deemed to have the highest likelihood of being able to establish a population of Bull Trout. This fish species has very specific habitat requirements. Thus, the range of Bull Trout is limited, occurring in just a handful of western states. In addition, Bull Trout populations typically occur at low density. The likelihood of Bull Trout causing ecological harm within Sullivan Lake or spreading to other areas within the Pend Oreille River drainage as a result of introduction into Sullivan Lake is low.

The project proponents are developing a robust monitoring and evaluation program for the proposed introduction, which will be included in the Implementation Plan, and based on literature review, existing information, and public involvement. Proponents intend to monitor and adaptively manage key metrics of the introduction and its impacts to the existing fish community.

Westslope Cutthroat Trout and Burbot populations would be monitored concurrently with Kokanee and the balance of the fish community via standard fish sampling. Baseline size distribution and relative abundance data for these 3 species are available from previous sampling efforts (e.g., Kokanee weir trapping and abundance estimates from hydroacoustics in the early 2000's, as well as standard fish community sampling from 2003 and 2018).

Pygmy Whitefish are cryptic, small-bodied fish which inhabit deep-water habitat and exhibit patchy distributions. Although difficult to sample with standard gear, a combination of methods is being proposed to monitor them, including deep-water small-mesh netting, environmental DNA (eDNA), use of a remotely operated vehicle (ROV- an unmanned underwater vehicle), and beach seining (to monitor shallow-water use during spawning movements and diurnal feeding migration patterns). Sampling methods and adaptations will be included in the Sullivan Lake Bull Trout Introduction Implementation Plan.

11. Water level management

Five percent (5%; 2 of 37) of opposing comments expressed concern that alterations to water level management in Sullivan Lake would occur as a result of Bull Trout introduction. The proposal for Bull Trout introduction does not include any change to water level management. Water level management for Sullivan Lake was negotiated following the Pend Oreille PUD's (PUD) surrender of its hydropower license and input from stakeholders, including the local community. A Memorandum of Agreement (MOA) was developed the between the State of Washington (Department of Ecology) and the PUD which dictates operation of Sullivan Lake Dam (Memorandum of Agreement Between the State of Washington and Public Utility District of Pend Oreille County for the Sullivan Lake and Sullivan Creek Water Supply Project 2010). The MOA has an indefinite term (no end date). Bull Trout introduction would not affect this agreement.

Next steps:

The project proponents want to thank those who provided comments on this proposal. The feedback was very helpful. It is clear that there are still a number of outstanding concerns regarding the proposal to introduce Bull Trout into Sullivan Lake, and we are committed to addressing those. Toward that end, we will not move forward on implementation of this proposal at this time. Instead, we will continue to work on developing a detailed plan that defines goals for the project, sideboards for its implementation, metrics to measure success and failure, and an adaptive framework with a specified timeframe and "off-ramps" if the project is deemed unsuccessful. This was a specific request by Pend Oreille County Commissioners at the beginning of the public meeting on April 17, 2024 in Metaline Falls. Once developed and distributed for public review, we plan to re-engage the community to determine whether concerns expressed during the public comment period were adequately addressed. Thank you for your participation in this process. It is much appreciated.

REFERENCES

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