MEMORANDUM

State of Alaska

Department of Fish and Game
Division of Sport Fish

TO: Glenn Haight, Executive Director
Board of Fisheries, Juneau

DATE: March 9, 2015

PHONE NO: (907) 267-2150

FROM: Thomas Brookover, Acting Director
Division of Sport Fish, Anchorage

SUBJECT: Request Consent to use Rotenone

Per Alaska Statute (AS 16.35.200), the Alaska Department of Fish and Game, Division of Sport Fish, requests Alaska Board of Fisheries consent to use rotenone to eradicate non-indigenous northern pike from Otter Lake on Joint Base Elmendorf-Richardson (JBER). Division personnel plan to apply rotenone to the lake in the fall of 2015. Under the above statute, northern pike are considered "predatory animals" that have eliminated all other fish species from the lake. This project is part of a larger Department of Defense (DOD) effort to restore anadromous fish passage to Otter Creek and Otter Lake on base. Eradication of northern pike from Otter Lake is essential to the effort to avoid northern pike dispersing from Otter Lake once fish passage is restored. To date, the Division has successfully used rotenone to remove invasive northern pike populations from two lakes in Anchorage, a series of ponds in Yakutat, and seven lakes on the Kenai Peninsula, five of which had stream connections.

Otter Lake is a relatively small lake compared with other waters ADF&G has treated. It is approximately 140 surface acres with a maximum depth of 26 feet. It also has a short outlet stream spanning approximately 1900 feet, above a perched and impassible beaver dam, that will be treated during this effort. Downstream of this beaver dam, sentinel fish in cages will be monitored to determine if neutralization is necessary. If so, the Department will be prepared to neutralize any rotenone that seeps outside of the treatment area through the beaver dam. There is no residential development near Otter Lake or Otter Creek, and the treatment area will be closed to the public until the rotenone degrades.

Treatment will be conducted by division biologists who have received formal training in proper rotenone application procedures from the National Conservation Training Center and are certified to apply aquatic pesticides in Alaska. Use of this chemical for fish removal is widespread in the lower 48, is not dangerous for non-gill breathing organisms at treatment concentrations, does not enter groundwater and does not persist in the aquatic environment. Rotenone kills fish by inhibiting a biochemical process that allows fish to utilize oxygen during cellular respiration.

As primarily a DOD project, JBER staff has taken the lead on completing the National Environmental Policy Act (NEPA) and state permitting processes for this effort. ADF&G, however, will take the technical lead on the application, monitoring, and evaluation of the rotenone treatment. As part of the NEPA process, an Environmental Assessment for this project was

completed in 2013 and put out for public review on March 31, 2013. The NEPA process is now complete, and a 'Finding of No Significant Impact' document was issued on July3, 2013. As part of the state permitting process for the Otter Lake rotenone treatment, an article announcing the project and public comment period ran in the Alaska Dispatch on December 18th and 19th 2014. The comment period was open for 30 days, but no public comments were received. The Alaska Department of Environmental Conservation approved JBER's application and issued a 'Pesticide Use Permit' for this project on January 29, 2015. This completed the permitting requirements for this rotenone application. BOF approval is the last permission needed for this project to move forward.

Please inform members of the board that the Division requests their consent to use rotenone in Otter Lake and Otter Creek. If approved, please ask the Chairman to provide notice of their consent.

Please contact Kristine Dunker (267-2889) or Tom Vania (267-2124) if you or board members have any questions or request additional information. Thank you.

Cc: Tom Vania