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Re: written comments on the rehabilitation proposals for Little Beaver Lake (SEPA No. 12055)

The Oroville Sportsmens Club (OSC) would like to thank the Washington Department of Fish and Wildlife (WDFW) for this opportunity to provide written comments on the proposed rehabilitation for Little Beaver Lake. The OSC is in agreement with the WDFW on the fact that Yellow Perch do not belong in Little Beaver Lake. However we have the following concerns with the proposed Rotenone treatment and lake management plan.

We are quite disappointed with the public scoping and it gave the appearance that the WDFW was trying to sneak this one through the process without adequate local public involvement. The public meeting for Little Beaver Lake was advertised in the Local paper July 19th for a public meeting July 24th in Twisp. This location is a good two hour drive for most of the interested members. Upon complaining to the landowner (USFS) about the meeting location an additional meeting was set up in Tonasket. With the short notice the only way to know about it was word of mouth which leads to confusion on the meeting topic. Also we were told that there would be a 30 day comment period starting Aug 1st. In watching the WDFW SEPA page we see that it was not posted until the end of July with comments ending the Aug 14th. It appears that the WDFW has already made up their mind on the project and outside commits are not important nor wanted.

From the public meeting we were left with the impression that Little Beaver Lake was not the primary Lake for rehab in Okanogan County for this year and the WDFW was behind the power curve to complete the process this year. Little beaver Lake is connected to Big Beaver Lake by a culvert. Mr. Jateff thought that there were some fish barriers at the culvert that were keeping the perch out of Big Beaver. He avoided the question on what kind of survey was completed on Big Beaver Lake other than one day with a rod and reel. He stated that he was hoping that the treatment of Little Beaver would take care of the problem without treating Big Beaver Lake. Hope is not a strategy that OSC can support in the use of Rotenone. OSC is concerned that WDFW is trying to put Little Beaver on the 5 to 7 year Rehab plan like other lakes in Okanogan County and we are concerned about the cumulative effects of continued treatments with Rotenone every 5 to 7 years on the same lake.

Little Beaver lake is a spring feed lake that flows into Toroda creek. We understand that there are fish barriers that are keeping the Perch from spreading downstream to Toroda creek. However we have two concerns on Beaver creek: 1.) With an above average water year the

stream may not go underground before reaching Toroda Creek this fall as it has in past drier years and affect a much larger area than planned. 2.) With an out flow and being spring feed we are concerned that the Perch will be driven down Beaver Creek and escape the treatment only to return to the lake in reduced numbers.

We are disappointed that in the rush to treat Little Beaver Lake angler opportunity will be lost by not enacting a special rule allowing anglers to keep all they can catch. This is a waste of a valuable resource.

Little Beaver lake has been known as a location to catch quality Eastern Brook Trout for over 50 years. We are quite disappointed that the department has chosen not to restock the lake with Eastern Brook. Tiger Trout have been used in other states to help slow the growth of Perch populations. Please consider planting at least some Tiger trout if you are still unwilling to stock Eastern Brook back into Little Beaver.

OSC is still concerned about the health effects of Rotenone and the WDFW ability to keep current on all the research. WDFW has not demonstrated that they are keeping up with current science. Examples such as handing out old copies of questions and answers on Rotenone that have been copied several times and are out dated as admitted by your Biologist. Also in our recent letter on Fish Lake Rehab the response given to our question was from the American Fisheries Society on Parkinson's disease and Rotenone. It did not respond to long term risk or study that was referenced [National Institute of Health Study \(February, 2011\)](#). We agree that in the case of Little Beaver Lake the risk of exposure is limited to WDFW personnel and the mitigations in place should protect the public. Over 200 research papers can be found dated after the 2002 SEPA date and the WDFW has not updated the educational material to support their desire to continue using Rotenone.

We support the recommendation made at the Public meeting to close Little Beaver Lake in the winter to encourage winter carryover and return the lake to the quality trout lake that it was before it was opened year long.

We also support the recommendation that the WDFW pursue increasing the penalty for illegal planting of fish.

In conclusion we encourage the WDFW to explore all options for the control and or removal of Perch in Little Beaver Lake. In our opinion the use of Rotenone is a serious undertaking and should be well planned out. Available or left over Dingell-Johnson/Wallop-Breaux (DJ/WB) funds should not be the reason to use Rotenone.

Thank you for your time and consideration,

/S/ Mike Daharsh

Mike Daharsh OSC President