



## Department of Energy

Bonneville Power Administration  
P.O. Box 3621  
Portland, OR 97208-3621

ENVIRONMENT, FISH & WILDLIFE

March 11, 2024

In reply refer to: ECF-4

### **To: People interested in the Upper Malheur Brook Trout Removal Project**

Bonneville Power Administration (BPA) is proposing to fund the Burns Paiute Tribe to eradicate non-native brook trout (*Salvelinus fontinalis*) to protect Endangered Species Act (ESA)-listed bull trout (*Salvelinus confluentus*) in the headwaters of the Upper Malheur River watershed. This letter explains what is being proposed, outlines our anticipated environmental review process and schedule, and requests your comments.

**Proposal:** BPA is proposing to fund the Burns Paiute Tribe to use rotenone, a fish toxicant, to eradicate all brook trout from High Lake and upper Lake Creek above Lake Creek Falls. (See enclosed project map.) Brook trout are a non-native, introduced, trout species that can hybridize with bull trout due to their genetic similarities. Lake Creek Falls acts as a natural barrier to bull trout migration and the uppermost 1.5 miles of Lake Creek and High Lake contain only non-native brook trout. Brook trout have been able to reproduce without resource competition and create a constant seed-source that invades downstream bull trout ESA-designated critical habitat. Past efforts to control the brook trout population have included electrofishing, angling, and gillnetting, but these methods have proven ineffective.

Rotenone would be applied to High Lake using an inflatable boat outfitted with an electric trolling motor and gas-powered pump, and drip stations would be placed along 1.5 miles of Upper Lake Creek. Crews would also treat seeps and springs with backpack sprayers. All staff involved in the treatment would be required to have appropriate pesticide applicator licenses and follow proper handling and application guidelines. All rotenone treatments would be applied at concentrations below the maximum allowable concentration of any active ingredient. At the downstream end of the treatment area, potassium permanganate (KMnO<sub>4</sub>) would be used to neutralize any rotenone that may still be active.

Continuous water sampling during and after treatment would occur to determine when the rotenone has degraded to levels that are safe for fish, wildlife, and human health. At that point, salvaged fish would be returned downstream of the treatment area and trails would re-open to public use. Rotenone treatments would occur annually until monitoring (via sampling for DNA in water, or electrofishing) confirms brook trout have been removed. It is expected treatments would occur over the span of one to three years.

The Oregon Department of Fish and Wildlife would serve as lead in implementation of rotenone treatments, with additional staff support from the agencies that comprise the Malheur Bull Trout Technical Advisory Committee, which would include the Burns Paiute Tribe, U.S. Fish and Wildlife Service, U.S. Forest Service, and the U.S. Bureau of Reclamation. The proposed action would take place within the Strawberry Mountain Wilderness and because several uses prohibited by Section 4c of the Wilderness Act have been proposed, including the use of an electric trolling motor and gas-powered pump, a minimum requirements analysis using the Minimum Requirements Decision Guide (MRDG) has been completed by the U.S. Forest Service. The MRDG determines whether an action is necessary in wilderness, followed by a determination of the minimum activity which least impacts the wilderness resource and wilderness character. The U.S. Forest Service in its MRDG determination concluded the following proposed actions are approved: Chemical application to the lake via small gas-powered pump, use of an inflatable boat and electric trolling motor for up to two treatments, and approximately seven gravity drip rotenone stations spaced along the stream with one gravity drip detoxification station downstream of the treatment reach.

Prior to implementation, signs temporarily restricting public access (estimated up to two weeks) would be posted at road and trail access points. High Lake and trails proposed for closure would have signs posted in advance of the treatment. Signs would also be placed at all trailheads in the Strawberry Mountain Wilderness which would indicate segments of trails closed, closure timing, and description of the project. Native fish would be salvaged from the stream and relocated downstream or kept in holding tanks to be re-released post treatment.

**Environmental Review:** To understand the potential environmental impacts of this proposal, BPA will prepare a supplement analysis to the Columbia River Basin Tributary Habitat Restoration Programmatic Environmental Assessment that describes anticipated impacts to natural and human resources and includes mitigation measures that would help avoid or minimize impacts. We are asking for your comments to help determine the issues that should be addressed in the environmental review. During this process, BPA will work with Federal, state, and local agencies, Tribes, potentially affected landowners, and other interest groups. The proposed schedule for the environmental review process is as follows:

<b>Scoping comment period -</b>	March 11-April 11, 2024
<b>NEPA determination -</b>	Summer 2024
<b>If decision to build, implementation begins -</b>	Late Summer/Early Fall 2024

**How to Comment:** Please send your comments by **April 11, 2024** and reference the *Upper Malheur Brook Trout Removal Project*. All comments will be available on the project website at [www.bpa.gov/nepa/um-brook-trout](http://www.bpa.gov/nepa/um-brook-trout). There are several ways to comment:

<b>Mail:</b> Bonneville Power Administration Public Affairs – DKS-7 P.O. Box 14428 Portland, OR 97291-4428	<b>Toll-free:</b> 800-622-4519 <b>FAX:</b> 503-230-4019
<b>Online:</b> <a href="https://publiccomments.bpa.gov/OpenCommentListing.aspx">https://publiccomments.bpa.gov/OpenCommentListing.aspx</a>	

**For More Information:** If you have questions regarding the environmental review process, please contact me at 503-230-4039, or by e-mail at [ldarotin@pba.gov](mailto:ldarotin@pba.gov). You can also reach us toll free at 1-800-622-4519.

Thank you for your interest in our work.

Sincerely,

Lindsey Arotin  
Environmental Protection Specialist

Enclosures:  
Project Map  
Comment Form  
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