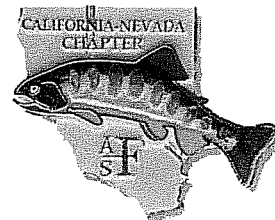




# AMERICAN FISHERIES SOCIETY

California-Nevada Chapter

<http://www.afs-calneva.org/Home.htm>



May 21, 2007

California Regional Water Quality Control Board  
Central Valley Region  
415 Knollcrest, Suite 100  
Redding, CA 96002  
Attn: Phil Woodward

Dear Regional Board,

**Adoption of Waste Discharge Requirements for the California Department of Fish and Game Lake Davis Pike Eradication Project, Plumas County**

The California-Nevada Chapter (Cal-Neva) of the American Fisheries Society (AFS) supports the California Department of Fish and Game's (DFG) proposal to chemically eradicate northern pike from Lake Davis. Cal-Neva requests that the Central Valley Regional Water Quality Control Board (CVRWQCB) adopt waste discharge conditions that will allow the Lake Davis Pike Eradication Project to proceed.

The Cal-Neva Chapter is the largest chapter of AFS with over 500 active members from the fishery science profession, including employees in Federal, State, and local governments, academia, and private consulting firms. The mission of AFS is to improve the conservation and sustainability of fishery resources and aquatic ecosystems by advancing fisheries and aquatic science and promoting the development of fisheries professionals.

We believe a well-planned chemical treatment utilizing a formulation of rotenone provides the best chance for eradicating the pike from Lake Davis. Rotenone is commonly used throughout the world by fishery scientists for the purpose of fisheries management. AFS has published a number of books addressing the safe and proper use of rotenone including *Rotenone use in Fisheries Management: Administrative and Technical Guidelines Manual* published in 2000. Additional AFS publications on this subject can be viewed at <http://store.afsbooks.org/x55032xm.html>. Only complete eradication of northern pike from Lake Davis would end the threat of the spread of non-native pike to waters downstream of Lake Davis that would jeopardize the multi-million dollar native fish restoration efforts in the Sacramento-San Joaquin Delta.

The ecological harm likely to occur from the downstream spread of northern pike would far exceed any possible harm from a well-planned chemical treatment of the reservoir.

Again, the Cal-Neva Chapter of AFS requests that the CVRWQCB adopt waste discharge conditions that will allow the Lake Davis Pike Eradication Project to proceed. If you have questions concerning this request, please contact me at (209) 366-2424 or at [Jeff\\_McLain@comcast.net](mailto:Jeff_McLain@comcast.net).

Respectfully,

A handwritten signature in black ink, appearing to read "Jeffrey McLain", written in a cursive style.

Jeffrey S. McLain, President  
California-Nevada Chapter  
1842 Alder Tree Way  
Lodi, CA 95242