



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

March 1, 2007

Lake Davis Pike Eradication Project
Attn: Ed Pert
CA Department of Fish and Game
1812 Ninth Street
Sacramento, CA 95814

Subject: Final Environmental Impact Statement (FEIS) Lake Davis Pike Eradication
Project (CEQ# 20070031)

Dear Mr. Pert:

The U.S. Environmental Protection Agency (EPA) has reviewed the above project pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act.

EPA provided detailed comments on the Draft Environmental Impact Statement (DEIS) on October 25, 2006, rating the document as EC-2, Environmental Concerns - Insufficient Information. We expressed concerns with potential impacts on the future operation of the City of Portola drinking water treatment plant, the possible presence of toxic blue-green algae, discharge permit requirements, neutralization options, funding for mitigation, and the overall long-term effectiveness of the eradication project.

We appreciate that the FEIS provided additional information regarding possible turbidity impacts to the water treatment plant, the presence of blue-green algae, discharge permit requirements, and funding and schedules for erosion repair mitigation measures. However, there are a few outstanding issues that are not included in the FEIS. In particular, the FEIS does not discuss the tradeoffs from the neutralization program. Given that neutralization would require significant mitigation measures, we continue to recommend further evaluation of the environmental and human health effects of neutralization and the availability of less potentially damaging options available to address National Pollutant Discharge Elimination System (NPDES) requirements.

Furthermore, it is not clear what lessons have been learned from the 1997 Pike Eradication Program. Although a report regarding this project has been incorporated, the lessons learned from this report were not summarized in the FEIS. In addition, we are also concerned that the FEIS and the Response to Comments does not include specifics regarding the planned measures to prevent reintroduction of northern pike in Lake Davis and other California waters. Although we recognize that the public has been involved in local project meetings, we continue

to recommend a complementary statewide education and enforcement program which will highlight the environmental, economic, and health consequences of the spread of pike in California waterways. One possibility is to work with fishermen and outdoor recreation organizations, bait shops, marina owners, fish wardens, local communities, public television, radio and other media sources to educate the public regarding the threat of pike reintroductions and spread.

We appreciate the opportunity to review this FEIS. Please send one copy of the Record of Decision (ROD) to this office at the same time it is officially filed with our Washington, D.C. office. If you have questions, please contact Summer Allen, the lead reviewer for this project, at (415) 972-3847 or at allen.summer@epa.gov.

Sincerely,

/S/ Connell Dunning for

Nova Blazej, Manager
Environmental Review Office

cc: Angela Dillingham, Plumas National Forest
Lahontan Region, Regional Water Quality Control Board
Todd Roberts, Public Works Department, City of Portola