



Robinson Rancheria Environmental Center

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4/3/07 BdMtg Item 4
Clear Lake
Deadline: 3/19/07 noon

Song Her, Clerk of the Board
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100



Dear Ms. Her,

This letter is in response to the proposed amendment to the Water Quality Control Plan for the Central Valley Region Basin to establish a Total Maximum Daily Load (TMDL) for Nutrients in Clear Lake.

The concerns of Robinson Rancheria Water Resource Department include the following:

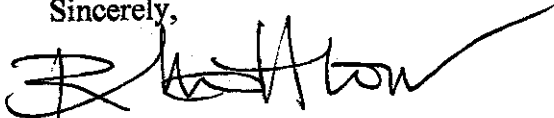
1. The research and studies that have been conducted to establish the TMDL may not have included the historical and current uses of all the water resources of the Clear Lake area by Native Americans. Tribal uses of these water resources and consumption of fish and aquatic plants, which is significantly higher than other Americans, include cultural practices and daily subsistence practices. The TMDL for nutrients may not be low enough to enable Native Americans to continue these necessary practices.
2. The development and implementation of a plan to collect the information needed to determine what factors are important in controlling nuisance blooms and to recommend what control strategy should be implemented should include local

stakeholders, including Native American Tribes, as well as the 'responsible parties'.

3. Loading estimates should include both water quality monitoring data and computer modeling. There is a need for increased water quality monitoring and parameters monitored to accurately estimate nutrient loading. Also, data collection may need to be conducted independently of the 'responsible parties' to confirm the accuracy of data collection.

If you have any questions regarding these comments, please contact me.

Sincerely,



Ronda Mottlow
Water Resource Manager

