

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



Dear Ms. Her,

The Big Valley Band of Pomo Indians would like to express our appreciation for the opportunity to comment on the proposed amendment to the Water Quality Control Plan for the Sacramento River and San Joaquin River Basins for the Control of Nutrients in Clear Lake.

Big Valley's cultural links to Clear Lake have been well defined by both history and current lifestyle. We support continued and strong increases in regulations to control nutrients in the Lake.

The Tribe believes that any phosphorous loading is harmful to the lake. Sedimentation brings contaminants into the lake and keeps the Lake from thriving. Therefore, we would like to see a load of zero. Eighty seven thousand one hundred kilograms of phosphorous loading might be a reduction of 40%, but it is still a significant amount of phosphorous.

We would also like to comment on the development and implementation of the plan. The amendment designates that the responsible parties work with the Regional Water Board staff, however, any stakeholders should also be given the same right. Stakeholders are an important part of developing a TMDL and Big Valley Rancheria as well as the other Clear Lake Tribes have been active in the stakeholder group. Tribes have historical and current use patterns that have not been adequately considered and incorporated into the Basin Plan and particularly TMDL development. Prohibiting full Tribal participation and decision making would potentially allow conditions that impair Tribal use of the lake as well as exist in violation of Tribal water quality standards.

The Tribe also believes that water quality monitoring must be included in any assessment of the lake.

Please contact me if you have any further questions.

Sincerely,

Sarah Ryan
Environmental Director