

Exhibit 2



Big Bear Municipal Water District

Lake Management

Board of Directors

Bob Ludecke – Division 1
Chuck Rounds – Division 2
Skip Suhay – Division 3
John Eminger – Division 4
Vince Smith – Division 5

October 20, 2006

By E-Mail

State Water Resources Control Board
1001 I Street
Sacramento, California 95814
Attn: Song Her, Clerk to the Board
commentletters@waterboards.ca.gov

Subject: 2006 Section 303(d) List of Water Quality Limited Segments for California; Region 8, Big Bear Lake, polychlorinated biphenyls

Dear Ms. Her:

I am General Manager of the Big Bear Municipal Water District, and have worked for the District for more than 20 years. The District is an independent special district of the State of California, and is responsible for the overall management of Big Bear Lake. I am writing in opposition to the proposed listing of Big Bear Lake for PCBs, and in support of the letter provided by Lawrence S. Bazel. I have personal knowledge of the facts provided below.

Any conceivable response to the listing will have a significant effect on the physical environment of Big Bear Lake. Because PCBs are found in sediments, a likely response would be to dredge the lake to remove the top layer of sediments. The District has previously considered dredging, and has identified severe negative consequences. Because there is no disposal site for sediments in the vicinity, the District has calculated that dredging would require hundreds of thousands of truck trips on a two-lane road to take the sediment to a site off the mountain.

Dredging would also disturb biota in the lake, because it removes and destroys aquatic life on the lake bottom. Dredging is an imperfect operation that results in the release of fines, which would redistribute sediments, including potentially contaminated sediments, thereby affecting fish, macroinvertebrates, and plants elsewhere in the lake.

Other possible responses include removing the PCB-containing carp from the lake

by applying rotenone, a potent fish toxin that would kill all fish in the lake, and then re-introducing fish into the lake. This action would kill all the fish in the lake.

Another possibility is draining the lake, taking bottom samples to identify the location of PCB contamination, and then conducting limited dredging to remove that contamination. This action would kill all the fish and other aquatic life in the lake.

Carp (the fish identified as having elevated levels of PCBs) are considered a nuisance fish unsuitable for human consumption. The district routinely engages in round-ups in which thousands of pounds of carp are removed from the lake and buried. Listing could result in a discontinuance of this procedure, thereby changing the prevalence of fish species and the biology of the lake.

The District now stocks sport fish in Big Bear Lake. If there is a significant reduction in fishing, the District will discontinue stocking and thereby transform the fish population and biology of the lake.

Listing is likely to result in mechanized operations at the lake, which produce elevated noise levels.

Big Bear Lake attracts 6 million visitors each year. Many visitors fish in the lake. If the State Board lists the lake as impaired because of PCB contamination of fish, a significant reduction in tourism can be expected.

A significant reduction in tourism will produce negative effects on the local economy and lead to urban decay and physical deterioration of the area.

A significant reduction in tourism will produce significant effects on the physical environment. Tourists will travel elsewhere in Southern California, thereby exacerbating the poor air quality of the region.

Diverting resources in response to the listing will harm the District's efforts to maintain and improve the water quality of the lake. For example, the District now actively removes invasive aquatic plants from the lake. The listing could interfere with that program, and thereby increase the spread of invasive aquatic plants in the lake.

Carp are neither a commercial nor sport fish in Big Bear Lake. Carp are a nuisance that are systematically killed in hopes of improving the environment for preferred fish.

Sincerely,



Sheila Hamilton