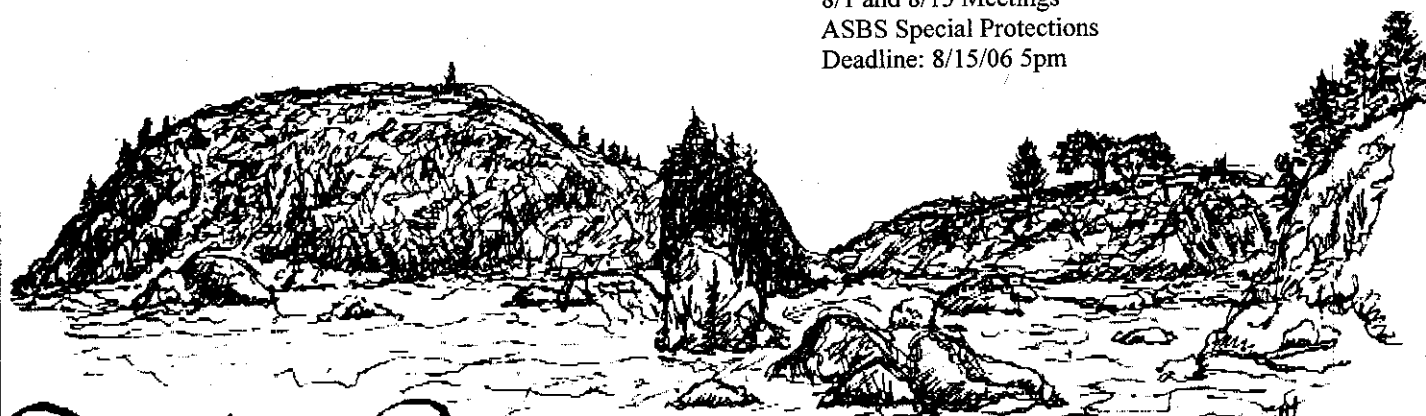


8/1 and 8/15 Meetings  
ASBS Special Protections  
Deadline: 8/15/06 5pm



# Trinidad Rancheria

August 2, 2006

Dominic Gregorio  
Division of Water Quality, Ocean Standards Unit  
State Water Resources Control Board  
P.O. Box 100  
Sacramento, CA 95812-01000



**Subject: Comments on Special Protections**

Trinidad Rancheria appreciated the opportunity to comment on the Special Protections to Address Storm Water and Nonpoint Source Discharges at your August 1 scoping meeting. Following are amplifications and additions to the comments we made at the meeting:

1. We would like the environmental document to explore the annual cost of various monitoring proposals, including estimated staff time, consultant time, equipment purchase/rental, and laboratory fees. What revenue streams or other sources are available to pay these costs?
2. We believe that it is not cost effective to set fixed monitoring requirements for any period of time, including the first five years. Adaptive monitoring that adjusts the monitoring requirements depending on the outcomes of previous monitoring will lessen the financial impact on cash-strapped entities such as ours. Additionally, adaptive monitoring will make more money available for solutions to the problems that do exist instead of continually monitoring for

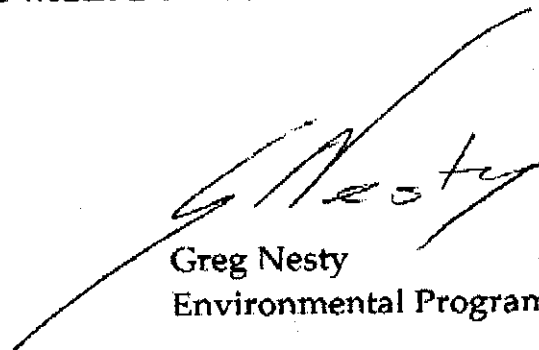
problems that previous monitoring has shown don't exist. A more comprehensive monitoring event could be scheduled every five or ten years or as triggered by events such as new construction or expansion.

- 3. Additional information beyond that in the "Working Draft—Staff Proposal" on the expected contents of Watershed Management Plans was presented during the scoping meeting. I asked that this information be e-mailed to me so I can make sure I have a complete copy. I will be able to respond to this issue when I receive this information.
- 4. We agree with the rationale presented at the scoping meeting that entities required by drainage law to convey flows should not be responsible to monitor for or eliminate pollutants generated primarily by upstream land uses over which the entities have no control.

Sincerely,



Garth Sundberg  
Tribal Chairperson



Greg Nesty  
Environmental Program Director

cc: North Coast Regional Water Quality Control Board  
5550 Skylane Blvd., Suite A  
Santa Rosa, CA 95403