

Date: January 20, 2012

To: California Regional Water Quality Board, Central Valley Region

Re: Wildhurst Vineyards, Wastewater Treatment Facility Waste Discharge Requirements, Order No. R5-2012

In order to conserve paper, the Robinson Rancheria of Pomo Indians of California is submitting comment on the proposed "Waste Discharge Requirements for Wildhurst Vineyards Wastewater Treatment Facility, Lake County" in written form by email.

It is the Tribe's comment that the Waste Discharge Requirements, Order No. R5-2012, Land application System section, page 5, #18, first sentence should not include the option to dispose treated wastewater by flood irrigation in the proposed land application area. Due to the close proximity to Kelsey Creek, the application methods should be limited to spray or drip. Flood irrigation greatly increases the potential for wastewater application overflow to Kelsey Creek riparian habitats and the potential to influence the groundwater gradient. Kelsey Creek is one of the few remaining spawning streams of the Clear Lake Hitch. The Clear Lake Hitch is listed as a Species of Special Concern by the State of California and is a native fish traditionally gathered by the Tribal Members of Robinson Rancheria.

Thanks for consideration,

Mike Schaver
Environmental Director
Robinson Rancheria of Pomo Indians of California