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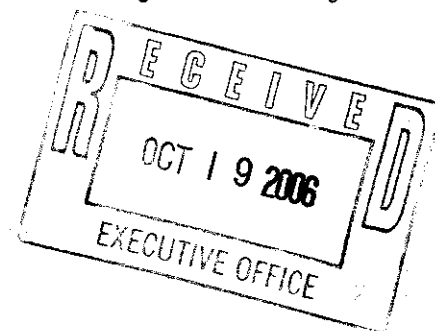
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October 16, 2006

California State Water Resources Control Board
1001 I Street
Sacramento, CA 95814



RE: Comment Letter—2006 Federal CWA Section 303(d) List
relating to list of water quality limited segments of the Laguna de Santa
Rosa, Mark West Creek, and Santa Rosa Creek in the North Coast Region

Dear Members of the California State Water Resources Control Board:

This letter constitutes comments by the Laguna de Santa Rosa Foundation, a California public-benefit not-for-profit corporation, on the proposed 2006 CWA section 303(d) list of water quality limited segments of the Laguna de Santa Rosa, Mark West Creek, and Santa Rosa Creek in Sonoma County. The Laguna Foundation was founded in 1989, with a mission to restore and enhance the Laguna de Santa Rosa watershed, including the Mark West Creek drainage. We seek to accomplish this mission through mutual cooperation and collaborative management – balancing ecological and human needs for a healthy environment and a healthy economy. The CWA section 303(d) list of water quality limited segments is an important instrument for overseeing and protecting these natural resources and the public trust.

The North Coast Regional Quality Control Board has referred to the Laguna de Santa Rosa as “the North Coast’s most impaired watercourse”, and with six proposed 303(d) listings, water quality is a serious concern in the Laguna. The Laguna Foundation has very strong concerns about the immediate and long-term effects of sediment, temperature and dissolved oxygen impairments and nutrient loading on the health of the aquatic system, which may directly imperil the survival of native fauna such as endangered anadromous fish species (e.g. steelhead trout and Coho salmon). Nutrient loading contributes to the nuisance growth of aquatic invasive plants such as water primrose (*Ludwigia* sp.), which is rapidly expanding in the Laguna watershed and is very difficult and expensive to control. Surplus nutrients also directly contribute to low dissolved oxygen by stimulating excess plant and algal growth leading to eutrophic low oxygen conditions, harming the aquatic fauna.

The Laguna wetlands have a number of extremely important ecological functions: supporting a diverse wildlife community, improving water quality, and serving as passive flood control mechanism. They are also important culturally and historically – fish and wildlife in these marshes provided food for the native community and early settlers, tules and sedges provided building and basket-making materials. The loss of native species due to increased water temperatures and sedimentation, impeding stages of the salmonid life cycle, and reduction in biodiversity due to rampant exotic invasive species severely threaten the ability to sustain the natural Laguna ecosystem functions.

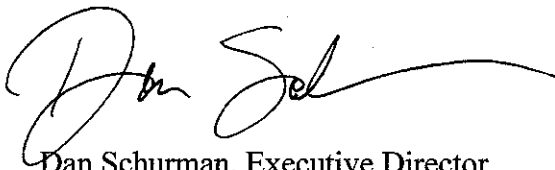
For these reasons, the Laguna Foundation supports the 2006 CWA section 303(d) listings for low dissolved oxygen, mercury, nitrogen, phosphorous, sedimentation/siltation and temperature for the Laguna de Santa Rosa, the sedimentation/siltation and temperature listings for both Mark West and Santa Rosa Creeks, and the pathogen listing for Santa Rosa creek. The Foundation also supports the proposed 2008 TMDL completion deadlines for dissolved oxygen and temperature for the Laguna de Santa Rosa, and the pathogen listing for Santa Rosa creek.

However, the Foundation highly encourages a greater urgency in the TMDL completion deadlines for all other impairments listed. Especially with regard to increased nutrient loading and sedimentation, the Laguna Foundation feels that a more rapid TMDL development is needed in order to address the negative ecosystem effects mentioned above. The longer we wait to assess and address these impairments, the greater the increase in the long-term negative impacts and related control and restoration costs.

The Foundation is currently working with the North Coast Regional Water Quality Control Board to develop the basis for a comprehensive assessment, modeling, and planning framework to facilitate basin-scale activities for flood protection, ecosystem health, water quality (including development of TMDLs), and water management for the Laguna de Santa Rosa, and has secured funding for this work. We believe that TMDLs for nutrients and sediment can and should be completed in a much shorter time frame, by 2012.

Thank you for consideration of these comments.

Sincerely,



Dan Schurman, Executive Director
Laguna de Santa Rosa Foundation



Christina Sloop, Research Director
Laguna de Santa Rosa Foundation