

Sonoma County Water Coalition

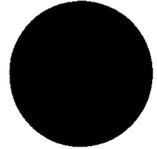
404 A Mendocino Avenue, Santa Rosa, CA 95404
707-575-5594

JAM
2nd
review

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Craig J. Wilson, Chief
Water Quality Assessment Unit
Division of Water Quality
State Water Resources Control Board
P. O. Box 100
Sacramento, CA 95812-0100

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November 22, 2005

Dear Mr. Wilson:

The Sonoma County Water Coalition includes 31 organizations representing over 27,000 concerned citizens.

We are responding to the NOTICE OF PUBLIC WORKSHOPS and request for public comment on the REVISION TO FEDERAL CLEAN WATER ACT SECTION 303(d) LIST OF WATER QUALITY LIMITED SEGMENTS FOR CALIFORNIA. We strongly oppose the delisting of the Laguna de Santa Rosa for nitrogen and phosphorus. Please place the Sonoma County Water Coalition on your notification list for interested parties, and inform your Board about our correspondence on this matter. We would also like to receive the notice for the December 6th meeting as soon as possible.

1

Our first concern is related to the lack of public process at the local level. We understand that the Water Control Policy for Developing California's Clean Water Act Section 303(d) List, Section 6.2, requires, "At a public hearing, the RWQCB shall consider and approve each proposed list change as documented in water body fact sheet. Advance notice and opportunity for public comment shall be provided." We note that you have scheduled a hearing on this matter in Sacramento only. Elimination of Regional Board hearings in Santa Rosa has in effect deprived many Sonoma County residents, including members of organization that belong to our Coalition, of the opportunity to give first hand accounts of the many Laguna problems.

2

We are deeply concerned about the infestation of the Laguna de Santa Rosa by exotic plants such as Ludwigia, which is multiplying at such a prodigious rate that a very controversial chemical eradication program was initiated recently at a cost of \$1.5 million. There is evidence that these plants provide habitat for mosquitoes, feared to be spreading West Nile virus, as well as degrading fish habitat. The eradication program is limited to only the two worst sections of the infestation, and if nutrients such as nitrogen and phosphorous continue to be discharged, the situation could get much worse.

Thank you for your consideration. Please do not delist the Laguna for these nutrients.

Sincerely,

 (Stephen Fuller-Rowell)
The Sonoma County Water Coalition