

**ROSENBLUM  
ENVIRONMENTAL  
ENGINEERING**

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*Received 7/11/97*  
2002 303(d) List Update  
Reference #2  
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Mr. Ross R. Liscum, Chair  
North Coast Regional Water Quality Control Board  
5550 Skylane Blvd., suite A  
Santa Rosa, CA 95403

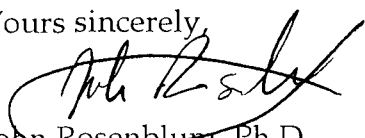
December 11, 1997

Dear Chairman Liscum:

I urge you to amend the proposed staff Resolution 97-132 Adopting the List of Waterbodies as Required in Section 303(d) of the Clean Water Act to improve its effectiveness in restoring water quality:

- 1) For the Laguna de Santa Rosa:
  - Add Dissolved Oxygen, temperature, and sediments to the pollutant list.
  - Add a directive to revise the existing TMDL, since most targets are not being met, especially for Total Nitrogen and Dissolved Oxygen.
- 2) For the Russian River:
  - Add temperature, nutrients, and Dissolved Oxygen to the pollutant list.
  - Add flow regime (too large in summer because of water supply operations; excessive flooding and erosion in winter because of floodplain alterations and dam operations).
- 3) Add Atascadero Creek and Green Valley Creek to the listing because of low Dissolved Oxygen, excessive nutrients, sedimentation/erosion, illegal discharges of industrial wastes, and elevated temperatures.
- 4) Add a directive to prepare monitoring plans for all waterbodies not included in the list because staff do not have data, but where they have recommended investigation. The frequent recommendation to "defer further action until Regional Board staff investigates..." can delay badly needed action for a very long time. A clear directive to perform the investigations in a timely manner will demonstrate the Board's desire to investigate waterbodies of concern to the public, and will allow staff to support this process as professionals.

Yours sincerely,

  
John Rosenblum, Ph.D.

5. DO NOT DELIST LAGUNA AND  
STEMPLE CREEK, BENEFICIAL  
USE KNOWN TO BE IMPAIRED.