

11/6/02

Craig Johns. 1.405 ✓

|| 1.103.1

Concerned with the listings of Laguna de Santa Rosa for nutrients and dissolved oxygen. Nutrients in the Laguna refers to nitrogen and phosphorous, controlling nutrients in the growth of algae. It seems to us that there has not been a relationship made between the phosphorous that is in Laguna, algae growth and dissolved oxygen. The nitrogen phosphorous ratio in the summertime is very low, approaching one, indicating nitrogen limitation, not phosphorous and it's also not in the phosphorous limitation range. Disagree with the RWQCB's justification for listing phosphorous, there is already a USEPA criterion for phosphorous. If there is a 303(d) listing for phosphorous or nutrients as is currently proposed, then that implies that a TMDL and a reduction of phosphorous would not have an impact on the dissolved oxygen concentration which is the ultimate concern for Laguna de Santa Rosa.

Please refer to the response to comment 1.2.7.

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|| 1.2.7

The RWQCB is recommending adding dissolved oxygen and nutrients to the 303(d) list. No evidence exists that reducing phosphorus in the Laguna de Santa Rosa will result in increased dissolved oxygen concentrations and phosphorus should be removed from the list recommendations, and should also not be included on the Watch List.

The fact sheet was in error in referring to a USEPA "criterion" of 0.1 mg/L for total phosphorus. This total phosphorus concentration is in fact a "desired goal" for the prevention of plant nuisances in streams or other flowing waters not discharging directly to lakes or impoundments.

The fact sheet was modified to reflect this information.

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