



N C R W Q C B

Sonoma County Water Coalition **MAR 16 2007**

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<input type="checkbox"/> AEO	<input type="checkbox"/> Timber	<input type="checkbox"/> Legal
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Regional Water Quality Control Board
North Coast Region
5550 Skylane Blvd.
Santa Rosa, CA 95403

March 16, 2007

Subject: Inclusion of the Laguna de Santa Rosa on the Clean Water Act Section 303 (d) List of Water Quality Limited Segments - for the invasive hydrophyte Ludwigia - for the next listing cycle.

Sonoma County Water Coalition includes more than 30 organizations representing over 25,000 concerned citizens.

Currently the Laguna de Santa Rosa is listed on the Clean Water Act Section 303 (d) List of Water Quality Limited Segments as impaired as a result of introduced pollutants: sediment/siltation, elevated temperature, biostimulants Nitrogen and Phosphorus, and lack of Dissolved Oxygen.

Surface water monitoring in the possession of the Regional Board indicates that the levels of biostimulants in the Laguna de Santa Rosa are high and are a significant factor contributing to the deteriorating conditions in the Laguna de Santa Rosa. Wastewater from the Laguna Subregional Treatment Facility, runoff from agricultural operations, and urban runoff have been identified as the sources of elevated nitrogen and phosphorus. The excess of biostimulatory substances (N and P), along with high levels of sediment, are creating the conditions for secondary water quality impairment by supporting the colonization of the Laguna de Santa Rosa by the invasive and nuisance plant species - Ludwigia.

There is significant information in the record, from past monitoring and evidence presented by the Laguna Foundation, to indicate that nuisance aquatic growth of Ludwigia is a serious problem in the Laguna de Santa Rosa - with public health implications for the surrounding neighborhoods. There is evidence that the colonization of the Laguna de Santa Rosa by Ludwigia has spread over the years and presents a mosquito control issue. Control of the Ludwigia by continuous application of herbicides is difficult, expensive, and not effective in the long run. Last year over 5,000 tons of Ludwigia were removed from the Laguna de Santa Rosa. Ludwigia control operations will cost close to \$2,000,000 in the next several years.

The Ludwigia control efforts are also compromising water quality standards in the Laguna. Pesticide application with biomass die-off, even with mass removal, leaves behind significant biomass. Eutrophic conditions related to decaying plant matter substantially lowers DO (a listed pollutant) and contributes to the nutrient cycle.

As indicated, the Regional Board has in the record (from previous listing cycles) significant evidence supporting the ongoing existence of the Ludwigia infestation and related nuisance effects where water quality objectives can not be met and beneficial uses can not be protected. In additions there is the ongoing public health risk presented by this invasive plant as a mosquito and disease vector.

Members: * Atascadero/Green Valley Creek Watershed Council * Coalition for Unincorporated Sonoma County * Community Clean Water Institute * Friends of Mark West Watershed * O.W.L. Foundation * Valley of the Moon Alliance * **Supporting Organizations:** Bellevue Township * Blucher Creek Watershed Council * Coalition for a Better Sonoma County * Coast Action Group * Coastal Forest Alliance * Community Alliance with Family Farmers (N.Coast Chapter) * Earth Elders of Sonoma County * Forest Unlimited * Forestville Citizens for Sensible Growth * Friends of the Eel River * Friends of the Gualala River * Graton Community Projects * Laguna Lovers * Madrone Audubon Society * Mark West Watershed Alliance * Occidental Arts and Ecology Center * Petaluma River Council * Russian River Advocates * Russian River Chamber of Commerce * Sonoma County Conservation Action * Sonoma Ecology Center * Town Hall Coalition * Western Sonoma County Rural Alliance *

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We believe there is sufficient information in the file (prior to February 28, 2007) in the form of monitoring data, data points, history, photos, etc., to support this listing under State Listing Policy - numeric and narrative criteria.

We believe that the effort associated with this listing is justified as it will facilitate progress in finding avenues of control (promoting programs limiting nutrients and sediment inputs) as pesticide control is not all that effective, has definite adverse water quality effects, and can not go on forever.

Sincerely,

A handwritten signature in black ink, appearing to read 'Stephen Fuller-Rowell', with a long horizontal flourish extending to the right.

Stephen Fuller-Rowell
Sonoma County Water Coalition