



# SIERRA CLUB

FOUNDED 1892

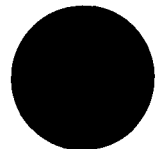
## SONOMA GROUP

404 Mendocino Avenue, Suite A  
P.O. Box 466, Santa Rosa CA 95402-0466  
(707) 544-7651 Fax: (707) 544-9861

RI  
JBM  
2nd  
review

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

November 15, 2005



578

Dear Mr. Wilson:

The Sierra Club Sonoma Group would like to respond to the NOTICE OF PUBLIC WORKSHOPS and request 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. (3)

First, we are concerned with the lack of public process in Sonoma County. 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 [Regional Water Quality Control Board] 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 are concerned that the only meeting regarding this subject is taking place in Sacramento. It is our opinion that elimination of Regional Board hearings in Santa Rosa has in effect deprived many Sonoma County residents of the opportunity to give first hand accounts of Laguna problems. In addition, we would like as many people as possible in Sonoma County to received the Public Notice of the Sacramento hearings on this issue scheduled for December. We believe it is important that all RWQCB meetings regarding the Laguna de Santa Rosa be publicized in Sonoma County clearly, concisely, and in a timely manner. (2)

Secondly, in regards to the delisting of the Laguna de Santa Rosa, we are concerned with the present state of the Laguna. There is an infestation of exotic plants such as Ludwigia which are multiplying at such a rate a chemical eradication program has been implemented estimated to cost \$1.5 million. This expense concerns us on many levels. (1)

There is evidence that these plants are degrading fish and other native species' natural habitat. To compound the problem, Ludwigia has been reported to be a breeding ground mosquitoes which leads to the fear of West Nile virus. We believe it is the high levels of nutrients that are partly responsible for causing Ludwigia to spread, and the current eradication program is limited to only the two worst sections of the infestation. If the nutrients continue to be discharged, the situation could get much worse. These are some of the reasons we ask you do not delist the Laguna for nutrients.

Thank you for your attention to our concern for notification of Sonoma County residents of all RWQCB meetings regarding the Laguna de Santa Rosa, and our opposition to the delisting of the Laguna de Santa Rosa for nitrogen and phosphorus.

Sincerely,

Anne Hudgins  
Sierra Club Sonoma Group Chair

Marsha Taylor  
Sierra Club Sonoma Group  
Conservation Committee Chair