

Song Her  
Clerk to the Board  
California State Water Resources Control Board  
PO Box 100  
Sacramento, CA 95812-0100



October 16, 2006

Dear Board,

Thank you for the opportunity to comment on the Proposed 2006 Federal Clean Water Act Section 303(d) List of Water Quality Segments. I would like to particularly comment on the Region of the **Laguna de Santa Rosa** under the Middle Russian River HA, Russian River HU Section of your proposal. Below are my specific comments:

Page 22: Russian River HU, Middle Russian River HA, Laguna de Santa Rosa

I generally concur with the Board's evaluation of the current situation for listing the Laguna de Santa Rosa in regard to the following criteria:

- Concur: 1) Low Dissolved Oxygen findings and Potential Sources
- 2) Mercury
  - 3) Nitrogen findings and Potential Sources
  - 4) Phosphorus findings and Potential Sources

As thorough and as appropriate as the above referenced evaluations are, there were omissions for this waterway region that have importance to both water quality considerations and wildlife, specifically with regard to endangered and threatened aquatic species, their food, and foraging habitat. My concerns and suggestions for improvements to the document are as follows:

Page 23: Pollutant/Stressor: Sedimentation/Siltation

Recommended Changes:

Add Under Potential Sources: **Herbicidal Alteration/Mortality of Riparian Vegetation**

Note:

The Laguna Foundation and CDF&G have sprayed the riparian corridor of the Laguna for 2 years, denuding the riparian landscape, significantly increasing siltation. While it was their belief that the efforts would reduce sediment trapping and Ludwigia, it has further exacerbated the siltation, and, perhaps through many escaped propagules, has spread and exacerbated the Ludwigia situation in the long term downstream.

Add Under Potential Sources: **Gross Mechanized Damage To Riparian Vegetation**

Note:

The Laguna Foundation and CDF&G have engaged heavy machinery that, slashed, cut and removed riparian vegetation along with the intended Ludwigia. This removal has been over 2 years and has cost \$2 million. It may continue if the NCRWQCB continues to overlook the serious implications of this procedure that increases siltation and impacts sensitive aquatic and avian species.

**Add Pollutant Stressor: Pharmaceuticals**

Note:

If the State Water Resources Control Board is serious about reducing stressor pollutants in a multi-stressor and pollutant waterway such as the Laguna de Santa Rosa for sensitive endangered and/or threatened species protected by Federal law then the Board can hardly overlook the increasing quantities and impacts of pharmaceuticals. The flow of pharmaceuticals from dairy waste (point source) and human waste (point source) from the Llano Sewage Plant will continue to effect the waterway and its inhabitants that rely on a healthy aquatic system and genetic pool to survive.

**Add Pollutant/Stressor: Cummulative Herbicide and Pesticide Organocompounds**

Note:

Many dairies (point source), grape growers (point source), farmers (point source) and residents (non-point) use many of these compounds adjacent to the Laguna Waterway. Even state agencies are using these chemicals on the waterway without regard to cumulative quantitative testing or qualitative studies on the effects upon sensitive aquatic, terrestrial or avian species of any taxa! I recommend that the Board take further bold necessary steps to test for, and regulate these toxic materials in our waterway.

I hope that this Board takes into serious consideration the changes I have suggested above. It is my hope that this Board continues to stay vigilant to its full regulatory charge by leading boldly in areas of water quality that consider the full cumulative impacts on biological trophic systems. It is in the interest of our most sensitive endemic species. It is in the interest of our own human health now, and for the future.

Thank you for your consideration.

Sincerely,

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cc: Representative Lynn Woolsey  
Congresswoman Barbara Boxer  
Sebastopol Mayor Sarah Gurney  
Supervisor Mike Reilly  
National Marine Fisheries  
US Fish and Wildlife Service  
US Army Corps of Engineers