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October 4, 2006

Song Her, Clerk to the Board
State Water Resources Control Board
1101 I Street
Sacramento, CA, 95812-0100
commentletters@waterboards.ca.gov



SUBJECT: 2004 Clean Water Act Section 303(d) List
Laguna de Santa Rosa Phosphorus & Nitrogen

Dear State Water Resources Control Board,

On behalf of the following local organizations:

Coast Action Group, Pacific Coast Federation of Fishermen's Associations, California Trout, Friends of the River, Russian Riverkeeper, Russian River Watershed Protection Committee, Redwood Chapter Sierra Club, Community Clean Water Institute, Petaluma River Council, Friends of the Eel River, Blucher Creek Watershed Council, Sebastopol Water Information Group, O.W.L. Foundation, Northern California River Watch.

I want to thank the State Water Resources Control Board for its good work on the current 303(d) list.

All the above mentioned groups give wholehearted support for the continued listing of the Laguna de Santa Rosa as impaired for excess nitrogen, phosphorus, sediment, temperature and low dissolved oxygen (DO).

The scientific data on record demonstrates that the Laguna is a severely impaired waterbody. High nutrient levels adversely affect the Laguna's beneficial uses. All sampling data indicates that nutrient levels grossly exceed those that are acceptable for swimming (REC-1). The nutrient levels, with associated eutrophication and associated low DO, are sufficient to limit threatened and endangered fish migration, survival, and incubation (REC-2 and COLD).

The high nutrient levels in the Laguna fuel the growth rate of algae and invasive aquatic plants like *Ludwigia hexapetala* (*Ludwigia*). The huge *Ludwigia* infestation in the Laguna constitutes an expensive nuisance as well as a health hazard by providing breeding habitat for mosquito species that transmit West Nile Virus.

Continued listing of the Laguna segment of the Russian River for biostimulants is not only consistent with the Clean Water Act Section 303(d), but it provides an essential foundation for future viability of this critically important biological habitat.

Sincerely, Nancy Kay Webb, Esq.

INTERESTED PARTIES / SIGNATORIES TO LETTER

Alan Levine
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Pacific Coast Federation of Fishermen's Associations (PCFFA)
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Eugene, OR 97440-3370
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Thomas J. Weseloh, Northcoast Manager
California Trout
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McKinleyville, CA 95519
(707) 839-1056

Steven L. Evans, Conservation Director
Friends of the River
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(916) 442-3155 x221

Don McEnhill
Russian Riverkeeper
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Healdsburg, CA 95448
(707) 433-1958

Brenda S. Adelman, Chair
Russian River Watershed Protection Committee (RRWPC)
P.O. Box 501
Guerneville, CA 95446
(707) 869-0410

Margaret Pennington, Chair
Redwood Chapter Sierra Club

WEBB / Laguna 303(d) Comments

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Jeannette Baumgardner, Chair
Blucher Creek Watershed Council
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