*The Sonoma County Ludwigia Task Force*

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*24 February 2005*

To: Catherine Kuhlman, Executive Officer
North Coast Regional Water Quality Control Board
5550 Skylane Boulevard, Suite A, Santa Rosa, CA 95403

From: The Sonoma County *Ludwigia* Task Force

Re: The development of a pollution control plan (TMDL) for the Laguna de Santa Rosa waterbody to support control of invasive aquatic plant species

CC: Members of the Sonoma County *Ludwigia* Task Force; Sonoma County Board of Supervisors; City Councils of Santa Rosa, Rohnert Park, Sebastopol and Cotati

Dear Ms. Kuhlman,

On behalf of the Sonoma County *Ludwigia* Task Force (Task Force), I would like to formally express our support for the expedited development of a Laguna de Santa Rosa pollution control plan by the North Coast Regional Water Quality Control Board (NCRWQCB). As a group, the Task Force is specifically involved in combating an invasion of the aquatic weed, *Ludwigia hexapetala* (*Ludwigia*), that infests more than 150 acres of wetlands and waterways in Sonoma County. The Laguna de Santa Rosa (Laguna) watershed, where the worst infestations occur, drains the Santa Rosa plain, with more than 200,000 urban and rural residents. This weed threatens public and environmental health in Sonoma County by providing protective habitat for mosquito vectors of West Nile Virus, and by degrading wetlands and clogging waterways. *Ludwigia's* cumulative effects are likely to have large negative impacts on Sonoma County's citizens and economy. We believe that water pollution, in the form of high nutrient and sediment levels, contributes to these problems.

The Laguna de Santa Rosa has been listed by the U.S. Environmental Protection Agency as impaired for excess nitrogen, phosphorus, sediment, and temperature, and for low dissolved oxygen. While such conditions directly degrade the beneficial uses of these waters, high nutrient and sediment inputs are also likely to enhance the growth rates of invasive aquatic plants, like *Ludwigia*. Preliminary experimental data suggests that reducing nutrient levels in the Laguna will increase our ability to manage *Ludwigia* infestations. For these reasons, the Task Force strongly recommends that the NCRWQCB move swiftly to develop a pollution control plan for the Laguna.

The Total Maximum Daily Load (TMDL) pollution control plan process leads to a "pollution budget", designed to restore the health of a polluted body of water. The Laguna de Santa Rosa is strongly in need of such an effort for both nutrient and sediment impairments. There is currently no systematic, quantitative assessment of water quality problems or

contributing sources of pollution in the Laguna. As such, there is no quantitative and equitable basis for determining the pollutant load reductions and control actions needed to restore and protect the beneficial uses of the Laguna, and its downstream contribution to the Russian River.

The Task Force recognizes that rigorous TMDL plans require time to develop and implement, when nutrient and sediment loads are substantially reduced. However, throughout its development process, *Ludwigia* will continue to be a serious management problem with negative impacts to public health, the local environment and economy. For these reasons, the Task Force strongly recommends that the NCRWQCB initiate its TMDL process as soon as possible.

Sincerely yours,

Anna L. W. Sears

Anna L. W. Sears, Ph.D.; Coordinator, Sonoma County *Ludwigia* Task Force
Research Director, Laguna de Santa Rosa Foundation
50 Old Courthouse Square, Santa Rosa CA 95404

At the consensus request of the Sonoma County *Ludwigia* Task Force, meeting February 11, 2005. Members in attendance:

Allan Buckmann; Wildlife Biologist, California Department of Fish and Game
Dick Butler; Team Leader, National Marine Fisheries Service
Denise Cadman; Natural Resource Specialist, City of Santa Rosa
Gene Cooley; Botanist, California Department of Fish and Game
Bill Cox; Fisheries Biologist, California Department of Fish and Game
Emily Dean; Permit Specialist, Sonoma County Water Agency
Brenda Grewell, Ph.D.; Plant Ecologist, USDA Agricultural Research Service
Erik Hawk; Vector Ecologist, Mosquito Vector Control District
Andrew Jensen; Environmental Scientist, RWQCB
Ron Keith; Entomologist, Mosquito Vector Control District
Piper Kimball; Vector Ecologist, Mosquito Vector Control District
Chris Kjeldsen, Ph.D.; Aquatic Botanist, Sonoma State University Emeritus Faculty
Chuck Krause; Operations Manager, Mosquito and Vector Control District
Dan Logan; Fisheries Biologist, National Marine Fisheries Service
Bruce MacArthur; Deputy Ag. Commissioner, Sonoma County Agricultural Commission
Jake MacKenzie, Ph.D.; City of Rohnert Park, Aquatic Botanist, retired EPA regulator
Jim Raisner; Agricultural Biologist, Sonoma County Agricultural Commission
Mike Reilly; Fifth District Supervisor, Sonoma County Board of Supervisors
Anna Sears; Research Director, Laguna de Santa Rosa Foundation
Joel Trumbo; Pesticide Use Coordinator, California Department of Fish and Game
Lily Verdone; Plant Ecologist, Biology Master's program, Sonoma State University
Jim Wanderscheid; Manager, Marin/Sonoma Mosquito and Vector Control District