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11/8/05

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



RE: COMMENT ON REVISION TO FEDERAL CLEAN WATER ACT SECTION 303(d)

Dear Mr. Wilson;

We are writing to you in response to a proposal to de-list the Laguna de Santa Rosa for nitrogen and phosphorus contamination. We strongly urge you NOT to de-list the Laguna de Santa Rosa and to keep in place the current, very necessary, protections.

The Laguna de Santa Rosa, one of California's last remaining large wetland areas, has received extraordinarily abusive treatment over the last several decades and as a result suffers dangerous levels of both nitrogen and phosphorus nutrients. Perhaps the most striking evidence of this contamination is the now-famous infestation of Ludwigia, an invasive noxious weed that feeds on nitrates and phosphorous. The infestation has been profound. The carpet of this plant has been in some places five feet thick and constitutes a nearly solid mass that literally chokes the water. A recent, and contentious, 1.5 million dollar decision to eradicate Ludwigia with an herbicide reduced the plant in places but was unable to eradicate it. Permitting more nutrients to contaminate the Laguna de Santa Rosa, as de-listing would do, will only fuel the growth of yet more of this loathsome and dangerous plant.

Ludwigia not only chokes off water flow, it prevents waterfowl from using the water and it removes large quantities of oxygen from the water and starves fish. The most alarming problem is the threat to public health. Ludwigia provides an ideal breeding habitat for the specific type of mosquito infected with West Nile Virus. This virus is known to kill birds, horses and people. SWQCB should do everything possible to restrict flows of contaminants like nitrogen and phosphorous into the Laguna de Santa Rosa and one of the most effective ways to do this is to stay the course on CWA Section 303(d) decisions. The very worst thing SWQCB could do would be to de-list the Laguna de Santa Rosa.

Please add our organization to you mailing and notification lists regarding this issue. In future, please consider conducting additional hearings on this issue locally where Sonoma County residents, the population most directly threatened by this decision, may participate.

Thank you,

H.R. Downs  
President