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December 1, 2005

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

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Dear Mr. Wilson,

Since 2003, the Laguna Foundation has been leading local efforts to control invasive *Ludwigia* in the Laguna de Santa Rosa. This weed has spread very quickly through the Laguna's shallow waterways, creating broad concerns for public health, environmental integrity, and flood control. Dense growths of *Ludwigia* provide protective habitat for mosquito vectors of West Nile virus, filling in wetlands and displacing native vegetation. We are currently coordinating a massive, publicly-funded program to address the worst impacts of this infestation; however, reducing nutrient levels in the Laguna is critical for long-term *Ludwigia* control. For these reasons we request that the State Water Resources Control Board maintain the current 303(d) listing for nitrogen and phosphorus impairment in the Laguna de Santa Rosa, and expedite the Laguna's scheduled TMDL process.

The scale of the *Ludwigia* problem is immense, and has raised great public attention due to concerns over mosquito control and environmental impacts to this sensitive wildlife area, the largest tributary to the Russian River. In October 2004, the multi-agency *Ludwigia* Task Force developed a two-phase control plan (please see attached) combining an aggressive, short-term treatment program with a long-term program of research and restoration to make the Laguna more resistant to aquatic weeds. In July and August 2005, more than 100 acres of channel and floodplain were treated with herbicides, and 4500 tons of plant materials were harvested and removed from the system. In the past year, more than \$1.5 million dollars in local, state and federal funds have been allocated to *Ludwigia* control and research, and more than \$900,000 dollars have been expended in 2005 alone. Since 2003, the Santa Rosa Press Democrat, and the Sonoma West Times and News have published more than 75 newspaper articles, editorials and letters to the editor on *Ludwigia* issues (please find list of articles and several examples, attached). Given the magnitude of *Ludwigia*'s impacts, control costs, and public concerns, *Ludwigia* is arguably the worst environmental nuisance in Sonoma County.

Researchers at the USDA and at Sonoma State University are currently seeking to quantify the relationship between *Ludwigia* growth and environmental conditions. Biologists working on this system consider it unlikely that growth of the observed rate and magnitude would be possible without the biostimulatory effects of excessive nitrogen and phosphorus levels found in the

Laguna. Recognizing the critical importance of nutrient reduction for long-term *Ludwigia* control, in February 2005, the *Ludwigia* Task Force formally requested that the North Coast Regional Water Quality Control Board expedite a TMDL pollution control plan for nutrient and sediment impairments in the Laguna (please find attached). The TMDL process provides an unbiased assessment of pollution in the watershed; and leads to the development of science-based regulations, land management and policy recommendations to restore water quality.

There is a long history of contention and finger-pointing over water quality impairments in the Laguna, and wide recognition that excess nutrients pose a great challenge for Laguna restoration. Without an official, comprehensive, and even-handed water quality analysis such as a TMDL, it will be difficult to move beyond acrimony, to identify the most important sources of impairments, and find practical solutions. Maintaining the 303(d) listing of nitrogen and phosphorus will permit this essential data-gathering effort to proceed as scheduled. We believe that removing the listing will undermine long-term *Ludwigia* control efforts, and lead to further environmental degradation, health risks, and public expense. For all these reasons, we respectfully urge the State Water Resources Control Board to maintain the Laguna's current regulatory status, based on the narrative standard of the Basin Plan.

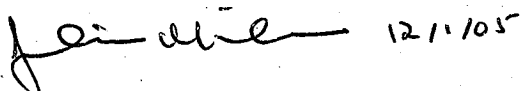
Yours truly,



Dan Schurman
Executive Director, Laguna Foundation



Anna Warwick Sears, Ph.D.
Research Director, Laguna Foundation



Julian Meisler
Ludwigia Control Project Manager, Laguna Foundation

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

Attached Documents:

1. *Ludwigia* Task Force letter of recommendation for *Ludwigia* control to the Sonoma County Board of Supervisors and the California Department of Fish and Game. October 28, 2004.
2. *Ludwigia* Task Force letter urging North Coast Regional Water Quality Control Board to expedite their nutrient TMDL, to aid in long-term *Ludwigia* control. The attached document is a copy of the letter as received by the Regional Board.
3. List of Press Coverage of invasive *Ludwigia* in the Laguna: 2003-2005.
4. Examples of Press Coverage:

Santa Rosa Press Democrat. Water Weed Spreads Through County. (9/17/04). The photo on this front page article was later chosen as one of the images of year for Sonoma County.

Santa Rosa Press Democrat. Herbicide first step to eradicate *Ludwigia*. (3/14/05).

Santa Rosa Press Democrat. Neighborhoods may be sprayed to kill mosquitoes. (5/13/05).

Sonoma West Times & News. Mosquito abatement hoped to slow West Nile virus. (7/29/04).