

From: "Jim Curland" <jcurland@defenders.org>
To: <commentletters@waterboards.ca.gov>
Date: Fri, Sep 1, 2006 1:39 PM
Subject: Comments: California Ocean Plan/ASBS - Special Protections to Address Storm Water and Nonpoint Source Discharges

ASBS Special Protections
Deadline: 9/1/06 5pm

>>>> Tam Doduc, Chair
>>>> State Water Resources Control Board
>>>> 1001 I Street
>>>> Sacramento, CA 95814

>>>> Re: Comment Letter - ASBS Draft Special Protections Policy

>>>> Dear Chair Doduc and Members of the Board:

>>>> On behalf of Defenders of Wildlife (Defenders), a nationally recognized conservation group, representing nearly a half million members and supporters nationwide, and more than one quarter of that in California, with our headquarters in Washington, DC, offices in eleven other states, including three offices in California: an office in Sacramento, a marine program office in the Monterey Bay area, a desert office in the West Mojave area, and additional offices in Mexico and Canada, we are submitting the following comments on the California Ocean Plan/Areas of Special Biological Significance (ASBS) - Special Protections to Address Storm Water and Nonpoint Source Discharges.

>>>> Defenders works on a variety of terrestrial and marine species and habitat conservation issues. The primary focus of Defenders mission is to focus our programs on what scientists consider two of the most serious environmental threats to the planet: the accelerating rate of extinction of species and the associated loss of biological diversity, and habitat alteration and destruction. Our programs encourage protection of entire ecosystems and interconnected habitats while protecting predators that serve as indicator species for ecosystem health. This coincides with the primary goal for the designation of 34 ASBS in California, to protect water quality for our coastal ocean. The California, or southern sea otter (*Enhydra lutris nereis*) is known for its role as an indicator or sentinel species for marine ecosystem health. This has been well-documented in the literature and much discussed throughout the sea otter research and conservation community over the last decade and more. With 40-60% of sea otter mortality being attributed to many diseases, that have land-based origins, it is critical to pay attention to the southern sea otter as we approach issues concerning water quality (in this case, Special Protections to Address Storm Water and Nonpoint Source Discharges as they relate to ASBS. We have attached seven articles dealing with the issues of sea otter mortality, sea otters as sentinel species, and water quality. These have been supplied by researchers from the Marine Wildlife Veterinary Care & Research Center, California Department of Fish and Game and U.C. Davis.

>>>> Defenders is part of much more detailed letter, signed on by many groups and submitted by NRDC on August 30th. However, we wanted to add this letter to the record. At the August 15th State Water Board workshop we attended in Monterey, Dr. Gary Wolf had requested copies of scientific articles on



>>>> these topics when I commented about sea otters as sentinel species for
>>>> marine ecosystem health.
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>>>> We appreciate your hard work on finalizing the ASBS Special Protections
>>>> Policy and please feel free to contact us should you have any questions.
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>>>> Sincerely,
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>>>> Jim Curland, Marine Program Associate

CC: "Jim Curland" <jcurland@defenders.org>