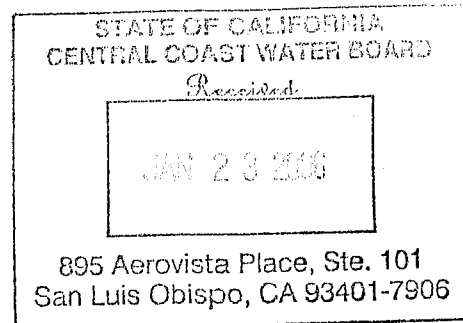


## The Otter Project

www.otterproject.org

January 17, 2006

Mr. Matt Thompson  
California Regional Water Quality Control Board,  
Central Coast Region  
895 Aerovista Place, Suite 101  
San Luis Obispo, CA 93401-7906



RE: Reissuance of Waste Discharge Requirements

Dear Mr. Thompson,

The Otter Project appreciates the opportunity to comment on the reissuance of waste discharge requirements to discharge to the Pacific Ocean for the City of Morro Bay and Cayucos Sanitary District. We applaud efforts put forth by the Regional Water Quality Control Board to upgrade the Morro Bay/Cayucos Wastewater Treatment Plant to include full secondary treatment standards, and we urge the Water Quality Control Board to adopt existing regulations which require full secondary treatment standards for Wastewater Treatment Plants as quickly as possible. Also, we encourage the Water Quality Control Board to include provisions to include the use of modern disinfection technologies.

Secondary treatment is critical for reducing the amount of pollutants that are currently entering the ocean. One cause of death in sea otters is disease from pollutants in the water<sup>i</sup>. Morro Bay is a 'hot spot' for sea otter mortality. Last year 78 of the 281 stranded otters were from Morro Bay. In 2003, 62 of the 262 stranded otters were from Morro Bay. There is little evidence to argue that the current substandard wastewater facilities explain the high sea otter mortality rate in Morro Bay, but we can argue that sea otters are dying of diseases from terrestrial bacteria and pathogens<sup>ii</sup> and that a cleaner, more fully treated discharge would carry fewer pathogens.

We are not suggesting that additional treatment would directly lead to fewer sea otter deaths; we are suggesting that secondary treatment plus disinfection will be more protective of wildlife and human health. Current operations of the Morro Bay and Cayucos Wastewater Treatment Plant are substandard and unnecessarily add more pollutants and diseases into the ocean. Upgrading the plant will help to reduce the amount of pollutants from wastewater and reduce the adverse impacts on the marine environment. A connection does exist between water quality and sea otter health.

Another study found sea otter feces contain bacteria and protozoa similar or identical to species found in humans and domestic animals. These include: *Campylobacter* sp., *Clostridium perfringens*, *Pleisomonas shigelloides*, *Salmonella* sp., *Vibrio* sp., *Cryptosporidium* and *Giardia*. Again, it is believed these bacteria and protozoa are found in the marine environment as a result of surface runoff and sewage effluent<sup>iii</sup>, suggesting a strong link between sewage and the bacteria found in sea otters.

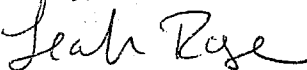
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A Nonprofit Organization

Our concerns with the plan include the lengthy timeline and the absence of modern disinfection technologies. Current facilities lag behind other wastewater treatment plants in California, and are in desperate need of upgrades. Nine and a half years is unreasonably long. Facilities servicing larger populations have upgraded to full secondary treatment standards in a shorter periods of time. The Otter Project maintains the proposed timeline is reckless in terms of protecting human health and Morro Bay's coastal marine environment, and we urge you to adopt a shorter, more efficient timeline.

The Otter Project also recommends the plan include provisions for the use of alternative disinfection methods to treat biological pathogens. These methods allow for more extensive treatment of the wastewater, and thereby greatly reduce the amount of pollutants entering the marine environment. These innovative methods, as outlined on the EPA website<sup>iv</sup>, have been successful in similar-size wastewater treatment plants in California. We encourage the EPA to be more proactive in promoting high water quality standards and healthy marine ecosystems in the Morro Bay and Cayucos district by adopting some of these methods.

Thank you for considering our comments on the wastewater discharge requirements for the Morro Bay/Cayucos Wastewater Treatment Plant. We hope to see an efficient upgrade process in the near future.

Sincerely,



Leah Rose  
Policy Manager  
The Otter Project

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<sup>i</sup> Estes, J.A., B.B. Hatfield, K. Ralls, J. Ames. 2003. Causes of mortality in California sea otters during periods of population growth and decline. *Marine Mammal Science* 19(1):198-216.

<sup>ii</sup> Lafferty, K., and L. R. Gerber. 2002. Good medicine for conservation biology: the intersection of epidemiology and conservation theory. *Conservation Biology* 16:1-12. 481.

<sup>iii</sup> Miller, Melissa. Christian, Nancy. Dodd, Erin. Murray, Mike. Jessup, David. Monitoring Threatened Southern Sea Otters for Exposure to Selected Fecal Pathogens.

<sup>iv</sup> <http://www.epa.gov/owm/mtb/mtbfact.htm>