

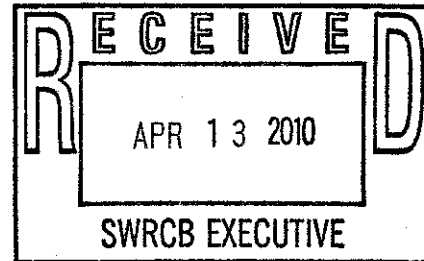


The Otter Project

www.otterproject.org

Charlies Hoppin, Chair
State Water Resources Control Board
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April 13, 2010

Concerning a statewide policy governing use of coastal and estuarine waters for once-through-cooling in power plants

Dear Mr. Hoppin,

I am writing to offer comments on the proposed changes to policies regarding the phase out of Once Through Cooling (OTC) technology in coastal power plants. Comments are made on behalf of The Otter Project, a nonprofit that exists to promote the rapid recovery of the California sea otter, and our 3000+ members.

The Otter Project has long been concerned with the impacts of OTC use in coastal power plants due to the substantial loss of marine species that takes place upon the withdrawal of an estimated 16 billion gallons of marine and estuarine water annually. Although physical impacts to otters due to OTC are negligible, the implications of OTC for ecosystem health, including richness and diversity of species at all levels of the food web, suggest that using this magnitude of water poses real threats to the integrity of coastal ecosystems. Our understanding of marine and coastal ecology is ever evolving, and what we are learning is that systems are intricately connected and networked in ways that we never imagined. Our coastal policies must be protective of these dynamic interactions.

The southern sea otter (*ehydra lutris nereis*) is an iconic local species in the California Central Coast. Native to the entire Pacific Rim, sea otters were driven to near extinction, only to recover from the brink to repopulate a portion of the California coast. Those regions lucky enough to have sea otters benefit from the otters' provision of ecosystem services—as well as a highly successful tourism appeal! Otters act as a keystone species, regulating ecosystem functioning by keeping kelp forests healthy and productive; they also are known as an indicator species, acting as a marine canary in the coal mine that alerts us to problems in the health of the near-shore.

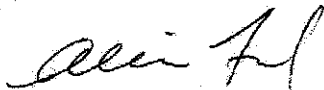
Although otters have recovered from their near-extinction, the population of California otters—a federally protected species under the Endangered Species Act and the Marine Mammal protection Act, has recently entered a decline. Even periods of recent growth have been sluggish, and far slower than expected by scientists observing otter populations elsewhere. The recent decline is cause for concern, and indicative of serious environmental concerns in the coastal ocean of the Central Coast. After years of research has failed to indicate a specific cause of the otter population's struggle, scientists, advocates and the public are concluding in frustration that otters are in trouble due to the wide-spread and complicated degradation of the coastal environment.

The Otter Project believes that the proliferation of OTC in coastal power plants is one of many factors in this degradation. OTC is known to be harmful to the marine environment, killing larvae, small fish, and anything else unlucky enough to get sucked up into the intake system. Given that the Clean Water Act mandated the phase out of this destructive technology nearly four decades ago, The Otter Project believes that the State Water Resources Control Board should act more decisively to achieve this goal. Recent changes in the proposed policy fail to move the State forward in accomplishing phase out of OTC.

The draft Statewide Water Quality Control Policy on the Use of Coastal and Estuarine Waters for Power Plant Cooling notes that the water board considered the cost of compliance to the regulations requiring the use of best technology available (BTA). I would like to point out that there are costs involved in failing to use BTA that fall on the public and the state. Many of these costs have not been formerly quantified, in spite of the fact that they are linked to direct economic costs and benefits in the California ocean economy—estimated at a value of \$43 billion¹. Substantial public resources go to protecting the coasts and oceans, such as the process to carry out the Marine Life Protection Act, and to restore the Delta—regulations preventing harm to these expensively managed resources are essential.

I urge the State Water Board to fully consider the ecological, economic and social costs of continuing to allow this antiquated technology to persist along our valued coasts, and adopt a OTC policy that is in line with the true value of our coasts and all their residents—otters and humans alike. Thank you for considering our comments.

Sincerely,



Allison Ford
Executive Director
The Otter Project

¹ California's Ocean Economy, National Ocean Economics Program, 2005