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ENVIRONMENTAL CENTER
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VIA FACSIMILE

October 5, 2006

Ryan Lodge, P.E.
Water Resource Control Engineer
Central Coast Regional Water Quality Control Board
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401

Re: San Luis Obispo Regional Storm Water Management Program

Dear Mr. Lodge,

Thank you for the opportunity to review and provide comments on the San Luis Obispo Storm Water Management Program (SLORSWMP). This year the Environmental Center of San Luis Obispo County is celebrating its 35th anniversary of environmental protection through education, advocacy, and community building.

We would like to express our support for, and incorporate by reference, the comments of the San Luis Bay Chapter of Surfrider, the Santa Lucia Chapter of the Sierra Club and the Natural Resources Defense Council.

In accordance with procedures provided under the General Waste Discharge Requirements for Storm Water Discharges from Small Municipal Separate Storm Sewer Systems (General Permit) and by the State Water Resources Control Board electronic notification, the Environmental Center of San Luis Obispo County hereby requests that a public hearing be conducted by the Central Coast Regional Water Quality Control Board regarding the SLORSWMP.

The many impacts of urban storm water runoff are well documented. As is observed in the SLOWSWMP, "urban runoff is a leading cause of pollution throughout California." Storm water is discharged into many sensitive water bodies from San Luis Obispo County. For example, Baywood-Los Osos and Cambria discharge into Morro Bay and Cambria discharges into the Monterey Bay National Marine Sanctuary. The Morro Bay estuary supports the most important wetland system on the Central Coast. The estuary is comprised of 2,300 acres of a semi-enclosed body of water where fresh water flowing from the land mixes with the salt

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water from Estero Bay. The resulting mix of waters supports a unique ecosystem with a rich diversity of migratory birds and a variety of plants and animals including the threatened southern sea otter.

Sea otters help to support a healthy marine ecosystem, particularly kelp beds, by controlling the populations of herbivores that graze on the plant communities. A healthy kelp forest plays a crucial role in near-shore marine ecosystems by providing juvenile habitat for fish species and altering water flows. The population of sea otters on the California coast is seriously threatened. The primary cause of sea otter deaths is infectious disease, particularly encephalitis caused by *toxoplasma gondii*. This pathogen is spread through the *t. gondii* oocysts in the feces of infected members of the cat family and the consumption of infected animals. The sea otters in Morro Bay and Estero Bay are especially impacted by *t. gondii*. They are nine times more likely to be infected than otters in other parts of their range.¹ Because there is an established connection between urban runoff and *t. gondii* levels, it is necessary for the SLORSWMP to include strong and measurable means to protect this threatened species. Sea otters are important to our ecosystem and are also emblematic of the Central Coast and deserve adequate protection.

We have many other concerns about the proposed SLORWSMP, this letter highlights just some them. We do not believe that this plan should adopted as written. The plan lacks specificity and quantifiable targets.

Thank you for this opportunity to provide comments. Please contact us if you have any questions.

Sincerely,


Morgan Rafferty
Executive Director

¹Haydee Dabritz, Outdoor fecal deposition by free-roaming cats and attitudes of cat owners and nonowners toward stray pets, wildlife and water pollution, Scientific Reports:Original Study, JAVMA, Vol. 229, No 1, July 1, 2006.