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**Sanctuary Advisory Council**  
**Monterey Bay National Marine Sanctuary**  
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RE: San Luis Unit of the Central Valley Project  
Public Comment on the Draft EIS

Dear Ms. Jacquemin,

At the August 5, 2005 meeting of the Monterey Bay National Marine Sanctuary Advisory Council, members learned of a plan proposed by the Bureau of Reclamation to discharge agricultural drainage from the San Luis Unit of the Central Valley Project into Estero Bay at a site 13 miles south the Sanctuary's southern boundary. The Sanctuary Advisory Council heard public comment from staff for a federal congressional representative and county supervisor and from the local estuary director and general public members, all of whom expressed deep concern for the ecological impacts of the ocean discharge. Sanctuary Advisory Council members also expressed concern for the potential ecological impacts based on their knowledge and expertise of ocean health and water quality issues.

The Sanctuary Advisory Council agreed to voice their strong and serious concern about the proposal to discharge these wastes into the ocean. Specifically, the Sanctuary Advisory Council wishes to convey the following concerns:

- The export of historically retained agricultural runoff from one water basin to another is inconsistent with the obligation of regional responsibility imposed on agriculture by the California State Water Quality Control Board. The adverse impact of accumulated selenium, known for its toxicity to wildlife, as well as other possible agricultural runoff, poses a threat to the marine environment.
- The population growth of the Southern Sea Otter, a threatened species under the Endangered Species Act, is sluggish and uncertain due in large measure to elevated mortality. Contaminants and disease contribute significantly to this mortality.

 Monterey Bay National Marine Sanctuary



- Nutrient loading is known to lead to locally enhanced primary productivity that can lead to hypoxic conditions in the vicinity of the effluent. Contaminants in this effluent can be bioaccumulated in the marine food chain and be transferred to migrating marine mammals, birds and fish impacting marine ecosystems far beyond the point of discharge.
- The central coast agricultural community has demonstrated their very strong commitment to maintaining and improving water quality in nearshore marine ecosystems in particular in the Monterey Bay National Marine Sanctuary. The proposed discharge could overwhelm and undo the very positive outcomes of this partnership.

In conclusion, the Sanctuary Advisory Council expresses its strong and serious concerns over the potential impacts this project will likely have over our Sanctuary and marine resources far beyond the point of discharge.

We request an extension of time to make further public comment on this project. Please keep us informed about deadlines for public participation with this proposed project. We strongly encourage the Bureau of Reclamation to fully evaluate the potential impacts from ocean discharge of this drainage, including but not limited to the serious concerns we have identified above. We also encourage you to explore alternatives to ocean discharge of the San Luis Unit of the Central Valley Project drainage.

Sincerely,



Deborah Streeter, Chair  
Monterey Bay National Marine  
Sanctuary Advisory Council