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SENT VIA FAX AND ELECTRONIC MAIL

July 26, 2007

Song Her Clerk to the Board, Executive Office State Water Resources Control Board PO Box 100 Sacramento, CA 95812-0100 Fax: 916-341-5620 commentletters@waterboards.ca.gov



RE: Comment Letter California Ocean Plan Amendment

Dear State Water Resources Control Board Members,

Thank you for the opportunity to provide comments on the proposed California Ocean Plan Amendments. These comments are submitted on behalf of the Center for Biological Diversity ("Center"). The Center is a non-profit organization with over 35,000 members, the majority of whom reside in California. The Center is dedicated to protecting imperiled species and their habitats by combining scientific research, public organizing, and administrative and legal advocacy.

A. Introduction

The Center urges the State Water Resources Control Board ("Board") to amend the pH standard, thus creating a more stringent water quality standard. At present, the Ocean Plan's pH standard is too lax to address the devastating impacts of ocean acidification. Additionally, the Center recommends increased monitoring of seawater pH.

Seawater is becoming more acidic as the ocean absorbs carbon dioxide. Although the ocean naturally exchanges carbon dioxide with the atmosphere, anthropogenic carbon dioxide emissions have intensified and hastened the ocean's uptake of carbon dioxide. Already ocean pH has changed by 0.1 units on average due to human activities, and this is a significant change in acidity. The ocean's absorption of carbon dioxide can impair the ability of marine animals to build shells and skeletons among other adverse effects on marine life.

To protect California's ocean environment and beneficial uses, the Board needs to amend the water quality standard for pH, a conventional pollutant. A stricter standard to prevent widespread changes in acidity is vital for an array of marine species. The health of California's coasts and oceans is an important part of California's identity and economy. To protect ocean