



September 8, 2004

Dominic Gregorio  
Environmental Scientist  
Division of Water Quality  
State Water Resources Control Board

College of Letters,  
Arts and Sciences

Wrigley Institute for  
Environmental Studies

Anthony F. Michaels  
Director

Dear Mr. Gregorio,

I write in support of the proposed mitigated negative declaration and the proposed exception to the California Ocean Plan for Scripps Institute of Oceanography (SIO). I am Director of the University of Southern California's Wrigley Institute for Environmental Studies, President of the Western Association of Marine Laboratories and founding president of the Council of Environmental Deans and Directors, a collection of 120 university environment programs. I believe that, appropriately controlled, discharges of sea water by marine labs are generally benign to the coastal habitats and that the long-term value of these facilities to a wide range of public interests and public goods warrants carefully-defined exemptions from the blanket discharge provisions for Areas of Special Biological Significance as defined in the California Ocean Plan.

Many of the Areas of Special Biological Significance are located near existing marine laboratories, in large part because these scientific centers have focused research on the areas near their facilities. In fact, scientists from marine labs are often the strongest proponents of protected areas and are usually the people who have collected the scientific data that justified the current ASBS network. In nearly every case, the marine lab preceded the ASBS designation and the later laws that defined the limits on discharges into these areas. Thus, the mere co-location of a marine lab seawater discharge and ASBS should not be, in itself, a major problem. The real issue is whether that discharge has a significant negative impact on the local ecosystem and whether whatever impact may exist exceeds the public good that the institutions themselves create.

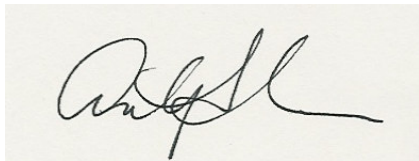
Marine labs are a critical infrastructure for understanding the coastal and open oceans. These facilities range from small universities to isolated field stations. Most share a few common features, a developed laboratory in close proximity to a special ocean ecosystem, a running seawater system to enable scientist to hold plants and animals in a healthy state for science and education and a community of scientists with interests in some organism or ecosystem that occurs in that area. These centers become the focal point of a great deal of local science as well as formal and informal public education. They create the knowledge that allows us to make sensible decisions about such issues as marine pollution and marine protected areas at the same time as they inform the

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public so that we can all make better decisions. This is a critical role, one that would be compromised by closure of the seawater systems. I want to be quite clear, SIO and many other coastal marine labs would reduce or lose their ability to conduct many important kinds of science if their seawater systems are shutdown. It would be the cruelest form of irony for these scientists to work so hard to help us understand and protect our coastal oceans, only to find that the un-intended consequence of that work is to close the very facilities that allowed such decisions to be made in the first place.

The proposed mitigated negative declaration for SIO clearly defines a set of steps to minimize the impact of SIO on the coastal ocean and to monitor its impact. These steps apply to both the ocean discharge and the stormwater runoff in these areas. The ASBS were set up with these discharges already in place and these mitigation steps should ensure that little to no negative impacts occur as a result of their activities. The co-location of marine labs and ASBS is a good thing for both. Just like a visitor center in a national park requires that a small area be developed to increase the value of the natural area to society, so this co-location provides a net benefit to the combination compared to each in isolation. I encourage the State Water Resources Control Board to accept this proposed plan, both in itself and as a template for the other marine labs in California.

Sincerely,

A handwritten signature in black ink, appearing to read 'Anthony Michaels', written on a light-colored rectangular background.

Anthony Michaels