



SIERRA CLUB COMMENTS FOR THE U.S. CORAL REEF TASK FORCE – 3/1/07

Task Force Chairs, members, and fellow participants: My name is Judith Lang, Vice-Chair of the Sierra Club's Coral Reef Working Group.

When these comments were written, we were still awaiting word on the outcomes of some key issues raised in our public comments submitted at the October 24, 2006 meeting of the Task Force. These issues are:

- Concerns raised by the Sierra Club's Florida Chapter, Cry of the Water, Reef Relief and others regarding impacts to coral reefs from treated sewage discharges from ocean outfalls on the South East Florida coast from Miami-Dade County northward to Martin County. These concerns include potential human health impacts as well as occurrences of algal blooms in the vicinities of the outfalls. These blooms are of particular concern to divers using Gulf Stream Reef near the Delray-Boynton outfall.
- Concerns raised by CORALations and the Puerto Rico Chapter of the Sierra Club regarding sewage treatment issues affecting the coastal waters of Puerto Rico. In particular, we urged that the EPA consider the issues raised by CORALations in their public comments regarding the Consent Decree between EPA and the Puerto Rico Aqueduct and Sewage Authority (PRASA). The Decree was still in draft form when we submitted our comments.
- Concerns over numerous sewage treatment plants in South East Florida and Puerto Rico operating with expired NPDES permits. In follow up communications with Task Force staff, we have requested an explanation from EPA as to the rationale for this practice.
- Concerns over the impacts of global warming and ocean acidification, and a request that the Task Force amend Objective 5 of Goal 11 of the National Action Strategy by changing **“Address the impact of global change, coral bleaching, and reef health on reefs and people,”** to **“Address the impact of global change, coral bleaching, and reef health on reefs and people, and support efforts at the local, state, national, and global levels to reduce emissions of greenhouse gases.”**

We note the following:

- We appreciate Bob Ballard's remarks, made on behalf of the State of Florida at the October Task Force meeting, in which he responded to issues raised in public comments regarding South East Florida outfalls, and for his pledge to work toward establishing an aquatic reserve to encompass the coastal waters from Miami County to Palm Beach County.
- We have received no response from EPA, directly or through Task Force staff, regarding the Consent Decree with PRASA, nor have we been informed of the current status of the Decree. We have also received no response regarding our questioning of the practice of allowing sewage treatment plants to operate with expired NPDES permits.
- We are very grateful for the eloquent and forthright statement the Governor of American Samoa presented at the October Task Force meeting, calling for a series of actions by the Task Force to address global warming, and for his support of the proposed amendment to the National Action Strategy mentioned previously. We support the initiatives he has put forward, and look forward to learning during this Task Force meeting of any progress made on them.
- While we are aware that the Task Force will be exploring the use of sequestration as a strategy for dealing with CO₂ emissions, we believe that the root issue of controlling total emissions of CO₂ must be addressed at the national level. The Task Force should be leading such an effort, rather than lagging well behind industry, commerce, state and city governments, and NGOs. We note that major corporations, including Duke Energy, Alcoa, Dupont, G.E., and Lehman Brothers, are also calling for Congressional action to reduce CO₂ emissions.
- There are alternative paths away from fossil fuels and other sources of CO₂ emissions. The Sierra Club endorses the strategies put forth by the American Solar Energy Society in their recent report titled **“Tackling Climate Change in the U.S. -Potential Carbon Emissions Reductions from Energy Efficiency and Renewable Energy by 2030,”** available at: <http://www.ases.org/climatechange/toc.htm>.
- As we present our public comments once more, we appreciate the progress which has been made in posting public comments at the Task Force website for review by persons not attending the Task Force meetings. We assume that the solicitation of public comments by the Task Force is made in good faith, and suggest there is room for improvement in the process, currently absent, by which responses are provided to these comments. We stand ready to assist Task Force staff in such an effort.

Thank you for the opportunity to present our comments.

Note added on March 4, 2007.

With regard to the final item above, we thank Mr. Keeney for his statement during the recent DC meeting that responses will be provided for public comments that are submitted to the Task Force.