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COMMENTS TO THE U.S. CORAL REEF TASK FORCE, FEBRUARY 13, 2009

We would like to thank the Task Force once again for the opportunity to provide public comment.

We recognize that much has to be done on a global level for the sustainability of coral reefs, such as reducing CO2 emissions. However much also has to be done on a local level to minimize cumulative impacts of poor water quality from sewage and industrial waste pumped off shore, storm water runoff, burial of our reefs and the affects from silt, sediment and turbidity from destructive beach and dune projects, dirty water from the Everglades being diverted to the east coast and lack of adequate water quality monitoring

We would like to submit the following comments and recommendations for the protection of the reefs of Broward County and Southeast Florida.

1) In light of the efforts of the State to streamline the permitting process and lessen protection for our reefs it is become apparent that we need the federal government to establish a management plan for the reefs of Southeast Florida that will afford our reefs the same protection as the reefs in the FKNMS. The reefs in Broward County generate even more to the local economy than the reefs in the Keys and support a multi-billion dollar fishing, diving and tourism industry. They protect the coast and work as nearshore buffers from wave energy. This is why it makes no sense to destroy the nearshore reefs in the name of beaches. We need sustainable beaches and fisheries and it is time we took a common sense approach to marine resource management in Southeast Florida.

We have been asking since the 8th USCRTF meeting in Puerto Rico in 2002 for a management plan for our reefs. Because of the State's unwillingness to move forward with a plan in a timely manner we ask that the federal government designate the reefs of Southeast Florida as a Marine Managed Area. As head of SEFCRI Chantal Collier's title is Coral Reef Manager although she has no authority to implement any of the recommendations made by SEFCRI. She was not allowed to participate in the recent Beach Management Working Group, yet the Working Group is clearly making recommendations for changes to state rules that will impact our reef.

2) We ask that the USCRTF support the expansion of NOAA's Rapid Response program that addresses events such as coral disease outbreaks, bleaching and harmful algae blooms. If we hope to get to the bottom of what is killing our reefs we must have a team of scientist properly funded to respond to these events as they place. They must have funding to train and deploy divers to collect samples and data, and analyzed the data that is collected in the field. The current policy of establishing a few monitoring sites that are visited once or twice a year is not adequate to document these disease outbreaks as they are happening.

When one of our elkhorn coral colonies became diseased we looked to Cheryl Woodley of NOAA for assistance identifying what was killing it. Cheryl worked with Esther Peters on the protocol for sampling. NOAA provided a dry shipper for samples and Esther who was still in South Florida for the Coral Reef Symposium came and dove with us to collect samples of the diseased elkhorn in Lauderdale-by-the-Sea and diseased staghorn in Ft. Lauderdale.

We believe that this is the kind of program that needs to be expanded to determine causes of declines in coral health, define Exposure-Response thresholds and provide technical information to managers and scientists on possible causes and remedies.

3) Florida has established a new Beach Management Working Group. We were told this group was formed because the state senators wanted better reporting on the status of beach projects in order to prioritize funding. We do not have a problem with recommendations on these matters. However after participating in some of the meeting of the Group, there seems to be an effort to dictate to the state agencies how they will conduct monitoring and reviews. For us the most alarming recommendations are the shortening of the review times, standardized mitigation, and issuing the state permit before the Biological Opinions have been finished by the federal agencies. What we find even more alarming is the fact that SEFCRI staff was not allowed to participate in this process. If SEFCRI staff had been allowed to participate, it would have given us a chance to implement some of the SEFCRI projects into the process. Many years and dollars have been spent on these projects and as Team Members we feel that if SEFCRI is not consulted on these issues it is a waste of time and money.

The Beach Management Working Group has recommended many rule changes geared to streamlining the permitting process instead of better protection of the resources. The recommended changes are too numerous to list in this public comment. It is for that reason that we ask that all Task Force agencies involved in the permitting process and SEFCRI staff review and comment on the recommendation of the Beach Working Group. These are Joint Coastal Permits and we ask the agencies to consider if these changes are contrary to the NEPA process and ESA. This is of particular concern because of the recent designation of our area as Critical Habitat for Threatened staghorn and elkhorn coral. Due to better monitoring we are learning how significant the impacts have been from past projects and these new recommendations could set us back 10 years.

Recommendations can be found at the DEP web site www.dep.state.fl.us/beaches

4) We believe that it is time for the Southeast Florida Coral Reef Initiative's Local Action Strategy to be updated from its original 2004 plan. In the 5 years we have participated in the LAS, many gaps have been identified. Stakeholder recommendations that destructive projects be avoided by using Best Management Practices for sustainable beaches were left out of our projects list. We are working off a document that does not meet the current needs of our local resources. SEFCRI projects that would work to identify past impacts and cumulative impacts by destructive projects have been slow to be implemented by the agencies.

We look forward to a response from Task Force agencies.

Thank you
Dan Clark