
I am submitting these comments to be reviewed at the US Coral Reef Task Force Meeting to be held in St. Thomas on October 24-28, 2006.

My concern surrounds the problem of partially treated waste water being discharged into the Atlantic Ocean by the Sewer Plant in Delray Beach Florida. Since 2005, the sewer plant has been operating without a permit as required by the Federal Clean Water Act. The Plant has not, and cannot, demonstrate that the discharge will cause no unreasonable degradation to the receiving environment. Indeed, to the contrary, FDEP is in possession of data which shows quite the opposite, that the discharge is destroying the reef from the pipe exactly upcurrent northward to Boynton almost in a neat line.

Action must be taken to require Delray Beach to build a sewage treatment facility that does not discharge waste water into the Atlantic Ocean. This can be done over a 5 year period and with limited cost if properly planned.

I appeal to US Coral Reef Task force, NOAA, USDEP, FDEP and other national, state and county agencies to give priority to requiring that Delray Beach immediately plan, fund and construct a sewer treatment facility that does not discharge partially treated waste water into the Atlantic Ocean.

Respectfully Submitted,
Jill M Bauersmith
Email jbauersmith@gmail.com

Dear Ms. Dieveney:

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Respectfully Submitted,

Chris Bolender

YOUEARNEDIT@GMAIL.COM

I am submitting these comments to be reviewed at the US Coral Reef Task Force Meeting to be held in St. Thomas on October 24-28, 2006.

I have just become aware of the problem of partially treated waste water being discharged into the Atlantic Ocean by the City of Delray Beach Florida. The Florida Department of Environmental Protection (FDEP) has determined that some 2,000 - 2,500 pounds of nitrogen are being discharged in this waste water effluent every day -- and, this has been going on for some years. The effluent is causing algae bloom over the Gulfstream Reef to the north of the discharge pipe and the algae bloom is damaging this ancient reef.

The permit, for Delray Beach to discharge this waste, expired in December 2003 and has not been renewed as a result of these problems.

Action must be taken to require Delray Beach to build a sewage treatment facility that does not discharge waste water into the Atlantic Ocean. Even if approval of such a facility were taken today, it would likely be 3-5 years before the facility were operational, in which time further damage will occur to the Gulfstream Reef.

I appeal to US Coral Reef Task force, NOAA, USDEP, FDEP and other national, state and county agencies to give priority to requiring that Delray Beach immediately plan, fund and construct a sewer treatment facility that does not discharge partially treated waste water into the Atlantic Ocean.

Respectfully submitted,

Charles Bonfield
President, SAFE (Safety As Floridians Expect)
220 Macfarlane Drive, Apt. 1203
Delray Beach, FL 33483
561 330 6329
ctbonfield@aol.com



Jennifer Coberly
jcoberly@zuckerman.com

October 2, 2006

Facsimile 301-713-4389
E-mail: beth.dieveney@noaa.gov

Beth Dieveney
U.S. Coral Reef Task Force Coordinator
Coral Reef Conservation Program
1305 East-West Highway
Silver Spring, MD 20910

Dear Ms. Dieveney:

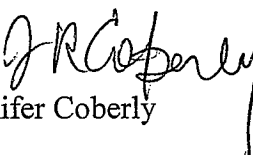
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Respectfully Submitted,


Jennifer Coberly

Please address the water quality issues that our oceans are facing. One in particular is the sewer treatment plant in Delray Beach, Florida.

Sincerely,
Michael Cohen
450 Ocean Dr.
Juno Beach, FL. 33408

Beth Diveney
U.S. Coral Reef Task Force Coordinator
Coral Reef Conservation Program
1305 East-West Highway
Silver Springs, Maryland 20910

October 11, 2006

Dear Ms. Dieveney:

I am submitting these comments to be reviewed at the US Coral Reef Task Force Meeting to be held in St. Thomas on October 24-28, 2006.

My concern surrounds the problem of partially treated waste water being discharged into the Atlantic Ocean by the Sewer Plant in Delray Beach Florida. Since 2005, the sewer plant has been operating without a permit as required by the Federal Clean Water Act. The Plant has not, and cannot, demonstrate that the discharge will cause no unreasonable degradation to the receiving environment. Indeed, to the contrary, FDEP is in possession of data which shows quite the opposite, that the discharge is destroying the reef from the pipe exactly upcurrent northward to Boynton almost in a neat line.

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I appeal to US Coral Reef Task force, NOAA, USDEP, FDEP and other national, state and county agencies to give priority to requiring that Delray Beach immediately plan, fund and construct a sewer treatment facility that does not discharge partially treated waste water into the Atlantic Ocean.

Respectfully Submitted,

Regina Coppers
11 Fayette Drive
Ocean Ridge, Florida 33435
Surfbanger182@aol.com
561-731-0007

1 October 2006

Beth Dierney

U.S. CRTF

1305 East-West Hwy.

Silver Spring, MD. 20910

Dear Ms. Dierney,

I am hoping you will pass on my concerns @ the U.S. Coral Reef Task force of Oct. 24-28 2006. I am distressed that partially treated waste water is being discharged into the ocean from the Sewer plant in Delray Beach, Florida. The plant is operating without a permit in violation of the Federal Clean Water Act. I urge that steps be put in place to require the city of Delray Beach to build or upgrade their facility which will eventually make discharge into the ocean unnecessary. Perhaps a wetlands along the lines of Green Cay could be considered as a continuation of the filtration process. Your efforts are greatly appreciated.

Respectfully,

Mark J. Fields

As a resident of Delray Beach, Florida I hope you will be able to address the issue of sewage dumped into the ocean just a mile offshore. The city's water treatment facility has been operating without a permit -this is unacceptable! Your assistance would be greatly appreciated.

Respectfully,

Mark J. Fields
mjgf2@bellsouth.net



Public Employees for Environmental Responsibility

P.O. Box 14463 • Tallahassee, FL 32317-4463
tel: 850-877-8097 • fax: 850-942-5264
website: <http://www.peer.org> • e-mail: flpeer@peer.org

COMMENTS OF FLORIDA PEER TO THE UNITED STATES CORAL REEF TASK FORCE

Florida PEER asks that the United States Coral Reef Task Force (Task Force) adopt all necessary measures to ensure the protection of coral reefs in waters over which the United States and the State of Florida have jurisdiction. These measures are, in our view, immediately necessary for a number of reasons, not the least of which is the continued “hands off” approach that the Florida, Department of Environmental Protection (FDEP) has adopted with respect to enforcing the Florida’s environmental laws. The FDEP is charged with administering the federal National Pollutant Discharge Elimination System Program. As a result of the FDEP’s enforcement philosophy federal issues, e.g. discharges of pollutants into surface waters of the United States, will also be all but ignored. Further, its attitude of fostering continued development, particularly in South Florida, all but insures that environmental stressors will increase into the foreseeable future.

Florida PEER has been documenting the FDEP’s failure to enforce Florida’s environmental laws for years. We issue annual reports on the subject and the Task Force can review the latest report at our website.

http://www.peer.org/news/news_id.php?row_id=664.¹ These reports document the FDEP’s lax attitude in particular to industrial waste and domestic waste dischargers across the state. In addition, however, a survey taken by the FDEP itself recently showed an employee base that feels threatened if it adopts scientific positions that are not in keeping with administration policies.

http://www.peer.org/news/news_id.php?row_id=655.

The result of such policies is that discharges such as the Boynton Beach outfall and a host of others that threaten the coral reefs off Florida’s coast are allowed to continue unabated. Moreover, permitting of such facilities is not likely to be curtailed, because, as was demonstrated by the Governor and the FDEP, there is simply no interest in the administration to heighten the protections given to the affected waters by designating them as Outstanding Florida Waters. PEER was a signatory to the 2003 petition that was presented to Florida’s Governor. There has been little more than a cursory acknowledgment of the problem since that time.

¹ We direct the Task Force’s attention to the press releases identified herein, as well as the links found in those press releases wherein pertinent data is set forth. We ask that all such links and data be incorporated with our comments herein.



In addition, the FDEP's lax enforcement policies mean that, for all intents and purposes, any redirection of water from Lake Okeechobee is unlikely to be effective. The reason we take this position is that unless and until the state and federal governments evidence a determination to curtail pollution going into the lake, any discharges from the lake will quickly be replenished by the same pollutants. We therefore ask the Task Force to pursue a policy that will ensure a reduction of pollutants upstream, as well as a policy that looks to the redirection of waters downstream.

As PEER indicated in our press release on October 4, 2006, Lake Okeechobee is seriously threatened. http://www.peer.org/news/news_id.php?row_id=759. Hoover Dike, as the press release indicates, is showing signs of rapid deterioration at a time when water levels are rising and the threat of being impacted by catastrophic hurricanes is increasing. Thus, the makings of a potential environmental disaster are present. *In addition, we are already seeing signs of increased algae blooms, shell fish contamination and fish and manatee kills in the area.* Yet, in spite of these problems the EAA continues to be designated as a non-flood zone area http://www.peer.org/news/news_id.php?row_id=765 and local governments such as Lee County in Southwest Florida are attempting to change property designations to allow for yet more development. http://www.peer.org/news/news_id.php?row_id=756.

In conclusion, we respectfully ask that the Task Force do everything in its power to heighten the protections afforded to the fragile coral reefs that grace Florida's off-shore waters. We maintain that this will necessarily require a redirection of both the state and federal agencies towards a policy of strict environmental enforcement and stringent permitting rules that will effectively reduce the amount of pollutants that are allowed to enter the surface waters in which these corals live.

Sincerely,

/s Jerry Phillips

Jerry Phillips
Director
Florida PEER

GLOBAL CORAL REEF ALLIANCE

A non-profit organization for protection and sustainable management of coral reefs

Global Coral Reef Alliance, 37 Pleasant Street, Cambridge, MA 02139, USA

Telephone: 617-864-4226

617-864-0433

E-mail: goreau@bestweb.net

Web site: <http://www.globalcoral.org>

October 13 2006

Beth Dieveny
US Coral Reef Task Force

PUBLIC COMMENTS TO THE US CORAL REEF TASK FORCE FROM THE GLOBAL CORAL REEF ALLIANCE

For years Cry of the Water, the Global Coral Reef Alliance, and a very widespread coalition of divers, fishermen, scientists, and environmentally concerned citizens have been begging the State of Florida to protect the best reefs left in Florida, in Broward County. This remarkable area has miles of reef with 30-40% live coral cover (compared to the Florida Keys reef tract's 6% and rapidly falling), the largest stand of endangered Staghorn coral known to remain in the Caribbean Region, and large numbers of ancient corals. Amazingly, these beautiful and unique reefs, the only ones in the continental US that can be swum to from the beach, have no legal protection whatsoever, are not even designated as reef habitat, and have no management plan for their protection!

This is a glaring and embarrassing failure of the USCRTF's mandate to protect all coral reefs in US waters. We have repeatedly formally requested the US Coral Reef Task Force to enforce the law under which they were constituted and require all their member agencies at Federal, State, and County level to stop approving projects that will degrade, damage, and destroy coral reefs. We have been stonewalled at every step, and Task Force members have told us privately that it is beyond their competence to even ask their own members to obey the law that set up the Task Force!

With millions of dollars of taxpayers money to dredging companies and their less than competent consultants, they will destroy marine resources that provide more than a billion dollars a year in economic benefits to the people of Broward County alone. Allowing this is a shameful fraud and coverup of the USCRTF's abdication of responsibility under the law.

We urge you to save the last and best before it is too late. Once deliberate official inaction and denial kills our reefs they will be gone forever. The window of

opportunity is rapidly closing, while EPA denies that sewage causes the algae blooms that kill corals, the Army Corps of Engineers denies that sediment kills corals, and NOAA denies that global warming kills corals.

The impacts of sedimentation on coral reefs have been known for over 150 years. The very first reef to be described by the first diving marine scientist (Ocho Rios in Jamaica by the late Prof. Thomas F. Goreau, where I learned to swim and dive as an infant) was destroyed by dredging before the very first description of reef zonation and ecology anywhere in the world could even be published. The impacts of high temperatures on coral reefs have been exhaustively documented since I developed the Coral Bleaching HotSpot method in 1990, which has been used to successfully predict the location, timing, and intensity of all major coral bleaching episodes worldwide before it can be seen in the field. The impacts of even small amounts of nutrients on coral reefs in causing bacterial and algal blooms that are killing South Florida reefs are clearly shown in my recent film, TOURISM, WATER QUALITY, AND CORAL REEF HEALTH, which can be viewed at <http://www.globalcoral.org>

In 2008 thousands of coral reef researchers from all over the world will come to Fort Lauderdale for the International Coral Reef Symposium. Either we will be able to show them that the United States is making serious efforts to protect its last remaining reefs, or we will sadly have to show them a dead reef, killed through irresponsible dredging, sewer releases to the ocean, and uncontrolled greenhouse gas emissions, which were approved and permitted by every Federal, State, and County Agency that should have had responsible oversight over our natural resources and led the fight to protect them from deliberate harm.

Future generations and the scientific community will bitterly blame those in power who allowed these unique natural treasures to be destroyed through willful neglect. If you do not act NOW it will be too late!

Sincerely yours,

Thomas J. Goreau, PhD
President
Global Coral Reef Alliance
37 Pleasant Street, Cambridge MA 02139
617-864-4226
goreau@bestweb.net
<http://www.globalcoral.org>

I encourage you to make sure that the Delray Beach, Florida, sewer discharge into the ocean is complying with all current environmental laws and is causing no damage to coral reefs.

Sincerely yours,

Charles Hunt
7121 Lake Island Drive
Lake Worth, FL 33467
561-967-4770
561-967-2902 fax
profit@smartsolutions.com

Beth Dieveney,
U.S. Coral Reef Task Force Coordinator
Coral Reef Conservation Program
1305 East-West Highway
Silver Spring, Maryland 20910

October 1, 2006

Dear Ms. Dieveney:

I am submitting these comments to be reviewed at the U.S. Coral Reef Task Force meeting to be held in St. Thomas on October 24-28, 2006.

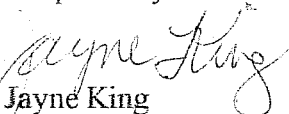
As I native Floridian, born in Miami Beach in 1951, I can remember my parents and neighbors telling me as a child that the ocean was like a toilet and when we flushed at home, it all washed out into the ocean. It gave me a sickening feeling to go swimming at the beach. I moved away from the area for many years and recently found out the shocking news that the ocean is STILL used as a toilet.!!

With all the development and massive population increase, it seems incredible that our water supply and coral reef is not protected more diligently. Wastewater treatment plants must be equipped to recycle the water to 100% reuse on golf courses, medians, lawns and other safe repositories and avoid the drilling into the Floridan Acquifer and dumping into the ocean. The technology is available and the funding source can be realistically structured within a five year plan. The responsible agencies must take action to implement the necessary facilities to eliminate all ocean outfalls, especially the South Central Regional Wastewater and Disposal Plant connected to the Delray Outfall, which has been operating without a valid permit since 2005.

It is obvious that dumping into the ocean is not an environmentally sustainable method of waste disposal. I appeal to the U.S. Coral Reef Task Force, NOAA, USDEP, FDEP and other national, state and county agencies to give priority to requiring that Delray Beach immediately plan, fund and construct a sewer treatment facility that does not discharge into the ocean or into the Floridan Acquifer by deep well injection.

As citizens, we entrust the protection of our environment to your agencies. You have a serious responsibility that effects millions of lives presently living along our coastal areas as well as the preservation of future generations. I urge you to fulfill your mission.

Respectfully Submitted,



Jayne King
3400 Place Valencay
Delray Beach, Florida 33445

jaynote@yahoo.com

(561) 637-8896

To the U. S. Coral Reef Task Force Meeting

It is so dismaying to me, a Florida resident, to know that our precious reefs are being destroyed daily and with official permission. First they are being smothered with millions of gallons of partially treated sewage which flows directly onto them. Second, they are being buried by permitted beach dredging and fill; during these processes they are crushed by pipes and machinery. Third, just as in the grounding of a freighter this last month, they are being crushed by ships. Fourthly, harmful algae blooms are created by polluted water from Lake Okeechobee and the Everglades Agricultural Area. Fifthly, port expansions, natural gas pipelines and inlet dredging also destroy them.

Even if the only concern were through tourism, rather than the more important one of protecting reefs that take 100's of years to grow, we must stop these damaging practices.

Thank you.

Judy Lamb, snorkeler, diver and concerned citizen
9419 NW 70 Place
Tamarac, FL, 33321
bokra2@mindspring.com

I am submitting these comments to be reviewed at the US Coral Reef Task Force Meeting to be held in St. Thomas on October 24-28, 2006.

I have a number of issues that I am concerned about.

First, I am concerned about partially treated waste water being discharged into the Atlantic Ocean by the Sewer Plant in Delray Beach Florida as well as other outfalls in Florida. Since 2005, the sewer plant has been operating without a permit as required by the Federal Clean Water Act. The Plant has not, and cannot, demonstrate that the discharge will cause no unreasonable degradation to the receiving environment. Indeed, to the contrary, FDEP is in possession of data which shows quite the opposite, that the discharge is destroying the reef from the pipe exactly upcurrent northward to Boynton almost in a neat line.

Action must be taken to require Delray Beach to build a sewage treatment facility that does not discharge waste water into the Atlantic Ocean. This can be done over a 5 year period and with limited cost if properly planned.

I appeal to US Coral Reef Task force, NOAA, USDEP, FDEP and other national, state and county agencies to give priority to requiring that Delray Beach immediately plan, fund and construct a sewer treatment facility that does not discharge partially treated waste water into the Atlantic Ocean.

Second, I am unhappy about the numerous beach re-nourishment projects which are causing turbid water conditions around our inshore reefs. These projects damage or destroy sea turtles and their nests as well as fish species. Dredges often operate near reefs and suck up fish and turtles killing them. These projects are given to much latitude to damage reefs and are unnecessary.

Third, I believe that nutrient waste from farms, golf courses and lawns are damaging reefs through algae blooms. We need more rigorous standards to prevent this runoff from damaging reefs.

Fourth, as a country we need to work to combat global warming which is damaging reefs throughout the world.

Please write me back to let me know that you have my comments.

Respectfully Submitted,

Drew Martin
500 Lake Ave. #102
Lake Worth, Fl. 33460
DMandCH@aol.com
561-533-6814

Please submit these comments to be reviewed at the US Coral Reef Task Force Meeting to be held in St. Thomas on October 24-28, 2006.

I am deeply concerned about the partially treated sewage that is being pumped out a discharge pipe into the ocean off Delray Beach in Palm Beach County Florida. The Sewage plant has been operating since December of 2005 without a permit which in directly violates the Clean Water Act. The plant has been unable to ensure that the discharge into the ocean will not, and has not cause degradation of the corals, and other substrate, which countless amounts of marine life depend on. Florida Department of Environmental Protection as well as recreational divers have data that support evidence to suggest that the surrounding discharge environment is being adversely affected by the partially treated sewage being dumped at 400 million gallons a month. The areas mostly affected are to the north of the pipe in which is the predominant current flow due to the Gulf Stream.

Immediate action must be taken to require the City of Delray to construct a sewage treatment facility that eliminates the practice of offshore discharge. This can be accomplished over about a 5 year period with limited costs if properly planned. With the highest levels of treatment this water can be made potable, but with less treatment, it can also be made safe enough to use for a variety of non potable applications. Possible applications include: Agricultural irrigation (crops, commercial nurseries), landscape irrigation (golf courses, parks), water for industrial use (cooling or process water), groundwater recharge and environmental uses (stream augmentation, marsh enhancement). also washing cars.

I appeal to US Coral Reef Task force, NOAA, USDEP, FDEP and other national, state and county agencies to give priority to requiring that Delray Beach immediately plan, fund and construct a sewer treatment facility that does not discharge partially treated waste water into the Atlantic Ocean.

Respectfully Submitted,

Robert Matriscino
PO Box 33687
Palm Beach Gardens, FL 33420
rmsurf@bellsouth.net
561.315.4912

Dr. Raymond F. McAllister
4850 NE 28th Ave.
Lighthouse Point,
Florida 33064
Prof. Emeritus
Ocean Engineering
Florida Atlantic University
(954) 426-0808
dinodivr@bellsouth.net

Beth,

As a member of the MICCI group of SEFCRI/SEAFast, supposedly trying to determine how we can save what is left of our reefs, I am thoroughly disenchanted by the way things are proceeding. As far as I can see, the Department of Environmental Protection (FDEP) of Florida and most of the local branches of Environmental Protection are being held hostage by big business, money and votes. There is an enormous amount of posturing and many meetings during which "stakeholders" express themselves, but very little of use to the reefs has been done in the last 2 or 3 years.

I have been trying for the entire life of SEFCRI to get a declaration of concern that the gas pipelines proposed for SE Florida comprise a significant threat to the reefs. As a result of the activities of several environmental groups, Cry of the Water, Save our Shorelines, myself and some others, we finally got the gas pipeline companies to pull the pipelines thru a gap in the reef (Tractebel/Calypto) and subsequently to try and get a permit for a tunnel from Port Everglades under our shallow water reefs (including the Third Reef), coming out of the bottom at about 120 feet of seawater. When, at the first meeting of SEFCRI, I asked them to express our concern to FDEP by a document in the name of SEFCRI, the moderator thanked me for my input, then said basically "getting back to our agenda" and the talk started. We have been talking ever since. The pipeline companies have been obstructed by non SEFCRI NGOs and by Bahamian environmental agencies, especially "Re Earth". El Paso has given up, while Tractebel and AES continue to plan on gas pipelines across Bahamian coral reefs and with modifications, under our reefs. Almost no consideration has been given to the possibility of a deep water Lophelia reef in 500 to 2000 feet of water.

One company has applied for a permit for a multiple leg offloading mooring which will spread over probably a half mile circle in about 1000 feet of water off Fort Lauderdale. The danger to a Lophelia reef is apparent. They are contemplating this because the Cat Cay development and Re Earth have kept the Bahama Government's feet to the fire.

Both Broward County and the FDEP seem to be afraid to move on matters that are politically unpopular (which means almost all coral reef protection matters.) The Delray Beach sewer outfall has been implicated in an algal bloom which is devastating coral and sponge reefs to its north. In spite of not having a permit to discharge treated sewage containing large amounts of algae feeding nutrients, they have repeatedly NOT gotten around to the studies that they have been asked to do to prove that the sewage is not damaging the reef. No action has been taken and the city has shown no plans for either the study or for a nutrient reduction program for its sewage. This is nothing new. While I ran a program for the FWPCA in the mid 60s, they repeatedly told us their sewage was treated. We finally sent the Delray lab a sample taken from

their outfall boil which included floating feces and a condom. They protested that we had offended the lab workers.

It will be easy for you to check this all out, but NOT by asking FDEP or Broward's DPEP. Ask university and other NGO scientists and activists who have the expertise but are routinely ignored.

When the FDEP was giving permits to the NASCA (North American Submarine Cable Association) to lay submarine cables directly on the live reef, I spent a great deal of time and some dollars proving that the cables damaged coral, soft coral, sponges and other megafauna. I pointed out that there were more than 30 gaps in the Third Reef thru which the cables could be laid without damaging the Third Reef. After a couple of years a Florida Rule was promulgated that suggested using the reef gaps but permitted laying the cable directly on the live reef if the companies wanted to go thru the full permitting process.

There is talk of dredging the Port Everglades Inlet, which will destroy a significant amount of coral. Furthermore there have been repeated ship groundings on our reefs, some of which thru the grounding and pulling the ships off the reefs, have damaged significant parts of an acre of coral each. I have repeatedly tried to get SEFCRI/SEAFast to publish a set of guidelines for coral recementation, using techniques I developed in 1988 when a cable between a dredge and tug did major damage to over 3 acres of Third Reef as the negatively buoyant cable (steel) dragged along the reef.

These guidelines have been repeatedly postponed for over a year and groundings continue. By the time we hold off for lawyers to decide who is to blame, some coral damage in the past has been delayed so long that corals and soft corals have died. This is somewhat better now but not because of FDEP or the SEAFast group but because the activists have made so much noise about the lack of response.

I have been known to call FDEP, FDED (dead) or the Florida Department of Environmental Degradation. because they are so slow replying to problems. When I appeared on a local TV show a member of FDEP was on the telephone with me, defending his organization. When I asked why they did not respond to damage to the reefs he said they did not have money to hire a marine geologist or coastal engineer. He then said they had assembled a team of experts and went with the team's decisions. The team was the company doing the damage and their hired "environmental" consultants. Basically they put the fox in the henhouse.

I am sure I could go on for another hour. If you want more, you have both my email and telephone.

Thank you for putting this on record.
Dr. Ray McAllister
Prof. Emeritus
Ocean Engineering
(954) 426-0808
dinodivr@bellsouth.net

Subject: Delray Spill out
From: Georgia Miclean <georgia_miclean@yahoo.com>
Date: Sat, 14 Oct 2006 13:07:59 -0700 (PDT)
To: Beth.Dieveney@noaa.gov

Dear Ms. Dieveney,

My name is Georgia Miclean and I am submitting this for your review at the US Coral Reef Task Force Meeting to be held in St. Thomas on October 24 - 28, 2006.

My real concern surrounds the sewer plant operating out of Delray Beach, Florida. Since 2005, not only has this sewer plant been operating without a permit as required by the Federal Clean Water Act; but, it has been discharging partially treated waste water into the Atlantic Ocean. This is an outrage! Whenever I have made a personal trip to that particular beach, I have had to leave because of the smell. I would not even tip toe in the water there. I was disgusted. This plant has not, and cannot, demonstrate that the discharge will cause no reasonable degradation to its immediate environment. Let alone its neighboring beaches. It is a shame to think of how much money goes into the tourism in that area, and just to know that the water there is unsafe. It is really sick. In fact, FDEP, has proof of this data, and it is also evidence of the discharge destroying the reef from the pipe exactly upcurrent northward to Boynton almost in a "straight line."

We must be able to do something about this. We must be able to make some legal adjustments for the sake of humanity and for safety of our natural reef. It is not smart for our people to be dumping waste water into our beautiful Atlantic Ocean. If we work together, we can implement a plan over a five year period that would cost a lot less. Especially, since we would be helping to create a healthier environment.

It is my duty to appeal to anyone who can make a difference, such as: US Coral Reef Task Force, NOAA, USDEP, FDEP, and other national, state, and county agencies to give this the attention it deserves. We must act immediately to save what we have left of Delray Beach, once we construct and fund a sewer treatment facility, we can rest assured of our families and friends to swim in our waters.

Sincerely,

Georgia Miclean
13397 William Meyer Court
Palm Beach Gardens, FL 33410
(561) 691-0179

10-5-06
mdwfla@adelphia.net

Dear Ms. Dieveney:

Please add these comments to be reviewed at the U.S. Coral Reef Task Force Meeting in St. Thomas on October 24-28, 2006.

I am extremely concerned about the problem of partially treated wastewater being discharged into the Atlantic Ocean by the city of Delray Beach, Florida. Since 2005, the wastewater plant has been operating without a permit as required by the Federal Clean Water Act.

This plant has not, and cannot, demonstrate that the discharge won't cause harmful degradation to the receiving environment.

In fact, the FDEP is in possession of data that shows the exact opposite: the effluent is destroying the reef from the pipe exactly upcurrent going North to Boynton practically in a straight line.

It is imperative that the city of Delray be required to build a sewage treatment facility that doesn't discharge wastewater into the ocean. It can be accomplished over a 5 year period and, if properly planned, within reasonable cost.

I am appealing the Task Force, NOAA, USDEP, FDEP & other national, state, & county agencies to make it their highest priority that Delray Beach immediately plan, fund, & construct a treatment facility that won't be a source of ocean pollution.

Respectfully submitted,

Michael Nutini (Michael

3561 Pine Needle Dr., D-2

Nutini)

Greep. 104185 FL 33463-2120

Dear Colleagues:

I write as a citizen and ecologist to urge all relevant agencies to require Del Ray Beach Florida from discharging partially treated sewage into the Atlantic Ocean. The evidence that it is adversely affecting reefs down-current is strong but even if the evidence were just circumstantial we should err on the side of precaution since we know that excess nutrients can allow algae to take over coral reefs.

Sincerely yours,

Dr. Thomas L. Poulson
Emeritus Professor of Ecology and Evolution, U. Illinois-Chicago
318 Marlberry Circle, Jupiter, FL 33458-2850
561-630-3643
tomandliz@bellsouth.net

October 13, 2006

Beth Dieveney
U.S. Coral Reef Task Force Coordinator
Coral Reef Conservation Program
1305 East-West Highway
Silver Spring, Maryland 20910

via fax to 301-713-4389, email to beth.dieveney@noaa.gov and by U.S. Mail

Re: Public Comments for U.S. Coral Reef Task Force Meeting October 25, 2006 in St. Thomas, U.S. Virgin Islands

Dear Ms. Dieveney:

The following comments are presented to the U.S. Coral Reef Task Force on behalf of the thousands of members of Reef Relief, a non profit grassroots membership organization dedicated to "Preserve and Protect Living Coral Reef Ecosystems through local, regional and international efforts." Reef Relief has been a watchdog for coral reefs for the past 20 years and hopes that you will consider and act on the following recommendations for saving endangered coral reefs in Florida and around the world:

1. Keep Offshore Oil Drilling away from Florida's Coast. Consider the attached Resolution to Protect the Coral Reefs of the Florida Keys and Florida's Coast from the Threat of Offshore Oil & Gas Development. For the past 25 years, fragile coral reefs and beaches in Florida have been protected from such development and are currently under Presidential and Congressional moratoria. But dangerous new legislation in the U.S. Congress proposes to open up Lease Sale 181 and coastal areas to offshore oil and gas development.

This area of the Eastern Gulf of Mexico is subject to the Gulf Loop Current, which oceanographers tell us would carry routine and very toxic drilling muds, along with any accidental oil spills, right into the nursery and breeding grounds for conch, spiny lobster and shrimp in the Lower Florida Keys. The current--and any pollutants it carries--would join the mighty Gulfstream around the southern tip of Florida and flow north over the reef tract where our endangered coral reefs are struggling to survive. Please add your name to the list of concerned citizens, elected officials, chambers of commerce, tourism and lodging associations, and newspaper editorials recommending against this ill-advised course of action.

2. Prevent the Everglades Restoration Plan from destroying Florida's coral reefs. Recommend that an enforceable nitrogen standard be established and implemented into the Comprehensive Everglades Restoration Plan designed to save the Everglades. Reducing

nitrogen is the only way to save the downstream coral reefs of the Florida Keys. Current plans to address only phosphorus are incomplete. Just as for sewage treatment, nitrogen and phosphorus must be removed from the agricultural and stormwater runoff that reaches Florida Bay and North America's only living coral barrier reef.

The nutrient loading running into the Bay and onto the reefs from the Everglades is the largest regional source of pollution to the coral reefs of the Florida Keys. It dwarfs the nutrient inputs from inadequate wastewater treatment, yet citizens of the Keys are paying big dollars to upgrade their sewage treatment to advanced, nutrient-stripped levels to protect our surrounding coral reefs. The actions of our federal/state partnership to save the Everglades should not come at the expense of the downstream coral reefs. Please issue a recommendation to clean up the runoff before it reaches our endangered coral reefs.

3. Reduce the pollution that degrades Florida's coral reefs and coastal waters. Last year, there were 677 closing and health advisory days posted for beaches in the Florida Keys, compared to 398 in 2004 and 346 in 2003, according to the annual NRDC beach report entitled *Testing the Waters*. In Florida, for the first time this year, red tides occurred at Keys coral reefs and there were more fish kills and discolored waters attributed to red tides in the first three months of 2005 than during the same time period in four of the previous five years. The blooms are worsening and are linked to wastewater discharges and other nutrient sources linked to nearshore sources of man-made pollution, rather than offshore, as previously thought.

Please do your part to encourage Florida's state and federal leaders to halt efforts to weaken water quality standards. In particular we should upgrade and enforce water quality standards for treatment of wastewater and stormwater to advanced nutrient removal for any area near coral reefs. Any wastewater injected underground into wells should be treated to this same high standard. Corals cannot tolerate nutrients from such pollution and the harmful algal blooms and toxic red tides they sponsor threaten Florida's coral reefs.

These first three recommendations are included in the recently-released *Florida's Coastal and Ocean Future: A Blueprint for Economic and Environmental Leadership*, authored by eight leading marine conservation organizations, including Reef Relief. It is available online at reefrelief.org. We fully endorse all of the recommendations of this paper and urge you to review and endorse it.

4. Establish an effective Habitat Conservation Plan for Elkhorn and Staghorn corals as part of the designation process for their listing on the U.S. Endangered Species List.

Acropora palmata and *A. cervicornis* corals were added to the Endangered Species Act's list of threatened species on May 9, 2006. The National Marine Fisheries Service is currently developing a habitat conservation plan to save these corals.

We ask you to recommend that the following actions be included in the habitat conservation plan for *A. plamata* and *A. cervicornis* corals in the Florida Keys; Broward County and Palm Beach County, Florida; U.S. Virgin Islands and Puerto Rico:

Reduce global warming; reduce sea temperature change: Encourage renewable energy use:

- * Promote solar energy especially throughout Florida
- * Prevent coal burning energy plants from being built in Florida
- * Encourage use of ethanol instead of gasoline; provide incentives for a distribution system
- * Encourage energy conservation; car pooling, smaller energy efficient vehicles, bikes, walking, etc.
- * Encourage use of energy efficient boat engines, use of fueling hydrocarbon pillows that reduce accidental spills

Prevent agricultural runoff from reaching coral reefs in the Florida Keys and other coral reefs, especially from Florida Bay and the Everglades.

- * Treat the runoff to remove harmful pesticides and nutrients prior to releasing it into canals that run into Florida Bay
- * Consider purchasing the areas that are most directly linked with pollutant discharges, e.g. sugar growing areas, and turn them back into natural filtering marshes/wetlands.
- * Eliminate tax subsidies for sugar production
- * Don't permit any new development in South Florida and other areas near coral reefs that does not contain and treat its stormwater runoff.

Upgrade sewage treatment to advanced nutrient removal levels for any areas adjacent to coral reefs, including the Florida Keys, Broward, Dade, Palm Beach coral reef areas.

- * Provide federal funding to help fund such projects. e.g. NOAA Water Quality Protection Plan, SFWMD, USACOE
- * Require tertiary nutrient-stripping wastewater treatment in all comprehensive land use plans for areas near coral reefs
- * Enforce the regulations already in place that prohibit the discharge of sewage into the ocean, e.g. Keys No Discharge Zone, FKNMS sanctuary regulations
- * Stop permitting deep injection of secondarily-treated waste in South Florida and other areas near coral reefs
- * Prohibit direct ocean discharge of sewage in all areas near coral reefs, especially South Florida
- * Expand the Keys No Discharge Zone to the federal sanctuary waters of the Florida Keys National Marine Sanctuary. This complies with their current regulations against discharging pollutants.

Enforce current state and federal environmental regulations and fisheries management regulations, e.g. FKNMS management plan regulating recreational and commercial activities, federal and state fisheries regulations, Clean Water Act, Florida State laws for Keys Area of State Critical Concern & protection of Outstanding Florida Waters, regulations for the Keys regarding shallow injection wells (effluent discharged into any shallow injection well in the Monroe County shall meet or exceed outstanding Florida Waters designation for receiving waters).

The U.S. Coral Reef Task Force has an opportunity to help reverse the decline of the world's coral reefs by calling on responsible parties to take meaningful action to save them. Our quality of life, our commercial fishing and tourism industries, and the many endangered species that depend upon coral reefs for habitat, are all at risk now. Your immediate attention to these recommendations are respectfully submitted for your consideration. We have no time to

waste.

Very truly yours,

DeeVon Quirolo

Executive Director

Attached: Resolution opposing Offshore Oil & Gas near Florida

**Resolution of the U.S. Coral Reef Task Force
Opposing Offshore Oil & Gas Exploration and Development
in areas affecting Florida's Coral Reefs**

Whereas, the Eastern Gulf of Mexico and areas south of Latitude 26 North have been under protection from offshore oil and gas exploration for the past twenty-five years through successive U.S. Congressional and Presidential moratoria; and

Whereas, legislation is pending in the U.S. Congress that would lift this protection and open up the Eastern Gulf of Mexico and areas offshore of the state of Florida to offshore oil and gas exploration and development; and

Whereas, the U.S. Minerals Management Service Five Year Plan for 2007---2012 would open up 21 lease sales in the Eastern Gulf of Mexico; and

Whereas, the Gulf Loop Current in the Gulf of Mexico would carry routine and harmful drilling muds and any accidental spills from these areas into the Lower Florida Keys where commercial shrimp and lobster breed, and then be carried by the Gulfstream up the oceanside of the Florida Keys, home to North America's only living coral barrier reef, the 3rd longest coral reef in the world and among the most endangered; and

Whereas, the economy of the Florida Keys is dependant upon tourism and commercial fishing and this marine ecosystem enhances our quality of life through boating, diving, fishing, and nature experiences and provides habitat for many endangered species such as sea turtles and conch as well as the recently listed elkhorn and staghorn corals; and

Whereas, a large reserve has been recently discovered in another area of the Gulf of Mexico that alleviates the pressure to open up fragile marine areas in the Eastern gulf to oil and gas exploration and development; and

Whereas, energy conservation and increased fuel efficiency standards for automobiles would result in a greater savings that all the oil and gas reserves in the Eastern Gulf; and

Whereas, adoption of alternative fuels such as ethanol and biodiesel would strengthen our country and support our economy and reduce our dependence on foreign oil; and

Whereas, the U.S. Coral Reef Task Force is mandated to act upon issues of concern to coral reefs and this qualifies as an urgent concern inasmuch as offshore oil would result in significant damage to the coral reef ecosystems of the Florida Keys, if allowed to occur;

Now therefore, the U.S. Coral Reef Task Force resolves as follows:

Consistent with our mandate, we support protection for Florida's coral reef ecosystem and express our concern by recommending against new offshore oil and gas exploration and development in the Eastern Gulf of Mexico, including additional efforts to expand exclusionary zones, extend Presidential and Congressional moratoria, and defeat legislation to open up areas near Florida's coral reefs to offshore oil.

Florida's coral reefs, mangroves, seagrasses, beaches, fisheries, endangered species, tourism and quality of life all depend upon clean ocean waters and healthy coral reefs. Please do your part to protect them from the impacts of drilling muds and spills, which can be carried by great

distances by the Gulf Loop Current onto Florida's coasts. Routine drilling muds release thousands of pounds of toxic chemicals into the environment and harm fish, corals and marine mammals. They place Florida at risk of a large or catastrophic spill.

We encourage you to:

*Oppose any new offshore oil and gas leasing, exploration, drilling activity and seismic inventories affecting Florida's coast.

* Permanently cancel the 90+ existing and active leases, some as close as 11 miles from our coast. Compensate the holders of those leases through rents due and royalty forgiveness for other current drilling activity.

* Support new Congressional moratoria against offshore oil drilling near Florida and other fragile coastal areas.

* Encourage extension of the Presidential Executive Order that bans leasing off America's east and west coasts and parts of Alaska from 2012 to 2020.

* Cancel any activity in Lease Sale 181 and establish a 150 mile buffer zone against drilling on Florida's east coast. The Martinez/Nelson bill, otherwise know as Senate Bill 2239 has the support of many. We encourage you to work for the strongest possible protections and larger exclusionary zones via this legislation. We oppose Interior's new 5 Year Plan for 2007—2012 that would offer 21 lease sales in the Eastern Gulf of Mexico and we oppose the Domenici bill, Senate Bill 2253.

* Encourage the adoption of renewal energy sources such as solar, ethanol and biodiesel, and further conservation of our energy use.

A copy of this resolution shall be sent to:

President George Bush, The Capitol, Washington, D.C.

Honorable Senator Bill Nelson, 716 Hart Senate Office Building, Washington, D.C. 20510

Honorable Senator Mel Martinez, 317 Hart Senate Office Building, Washington, D.C. 20510

Honorable Representative Ileana Ros-Lehtinen, 2160 Rayburn Building, Washington, D.C. 20515

Governor Jeb Bush, The Capitol, Tallahassee, Florida 32301

Renee Orr, 5 Year Program Manager, Minerals Management Service (MS-4010), Room 3120, 381 Elden Street, Herndon, Virginia 20170

Approved this _____ day of October, 2006.

By: _____

Dear Ms. Dieveney:

I am submitting these comments to be reviewed at the US Coral Reef Task Force Meeting to be held in St. Thomas on October 24-28, 2006.

My concern surrounds the problem of partially treated waste water being discharged into the Atlantic Ocean by the Sewer Plant in Delray Beach Florida. Since 2005, the sewer plant has been operating without a permit as required by the Federal Clean Water Act. The Plant has not, and cannot, demonstrate that the discharge will cause no unreasonable degradation to the receiving environment. Indeed, to the contrary, FDEP is in possession of data which shows quite the opposite, that the discharge is destroying the reef from the pipe exactly upcurrent northward to Boynton almost in a neat line.

Action must be taken to require Delray Beach to build a sewage treatment facility that does not discharge waste water into the Atlantic Ocean. This can be done over a 5 year period and with limited cost if properly planned.

I appeal to US Coral Reef Task force, NOAA, USDEP, FDEP and other national, state and county agencies to give priority to requiring that Delray Beach immediately plan, fund and construct a sewer treatment facility that does not discharge partially treated waste water into the Atlantic Ocean.

Respectfully Submitted,

Ann Rossman

wrann@bellsouth.net

321-952-3084

Dear Ms. Dieveney:

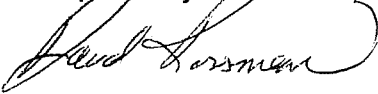
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Respectfully Submitted,



David Rossman

drossma2@fau.edu

561-315-0407

Dear Ms. Dieveney:

I am submitting these comments to be reviewed at the US Coral Reef Task Force Meeting to be held in St. Thomas on October 24-28, 2006.

My concern surrounds the problem of partially treated waste water being discharged into the Atlantic Ocean by the Sewer Plant in Delray Beach Florida. Since 2005, the sewer plant has been operating without a permit as required by the Federal Clean Water Act. The Plant has not, and cannot, demonstrate that the discharge will cause no unreasonable degradation to the receiving environment. Indeed, to the contrary, FDEP is in possession of data which shows quite the opposite, that the discharge is destroying the reef from the pipe exactly upcurrent northward to Boynton almost in a neat line.

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Respectfully Submitted,

Walter Rossman

wrann@bellsouth.net

321-952-3084

Dear Ms. Dieveney,

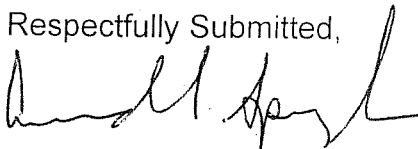
My name is Andy Spengler I am a Delray Beach, FL resident of more than 20 years. I am also an avid surfer, scuba diver, fisherman and a father of three young children. Not a week goes by that my family and I are not participating in an activity that revolves around the ocean. For this reason I have great concern with what is taking place off our shores. Please submit my comments/concerns for review at the US Coral Reef Task Force Meeting to be held in St. Thomas on October 24-28, 2006.

My concern surrounds the problem of partially treated wastewater being discharged into the Atlantic Ocean by the Sewer Plant in Delray Beach, Florida. Since 2005, the sewer plant has been operating without a permit as required by the Federal Clean Water Act. The Plant has not, and cannot, demonstrate that the discharge will cause no unreasonable degradation to the receiving environment. Indeed, to the contrary, FDEP is in possession of data which shows quite the opposite, that the discharge is destroying the reef from the pipe exactly upcurrent northward to Boynton almost in a neat line.

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Respectfully Submitted,



Andrew I. Spengler
927 Jasmine Drive
Delray Beach, FL 33483
(561) 276-1996
andy@spenglerconstruction.com

October 12, 2006

Beth Dieveney
U.S. Coral Reef Task Force Coordinator
Coral Reef Conservation Program
1305 East-West Highway
Silver Spring, MD 20910
beth.dieveney@noaa.gov

RE: PUBLIC COMMENT OPPORTUNITY
OCTOBER 25 & 27, 2006 MEETING

Dear Ms. Dieveney:

This letter addresses the concerns of the City of Fort Lauderdale as to the protection and preservation of the coral reefs near coastal waters of the City.

The City of Fort Lauderdale is concerned about the numerous groundings of commercial vessels on the coral reefs in the Atlantic Ocean adjacent to the City's beaches and waterways. The City of Fort Lauderdale desires to protect the environment in and about its waterways and beaches. The City's economy and quality of life are enriched by recreational boating, recreational diving and recreational fishing near its coastline. The citizens and visitors of the City have an interest in the coastal waterways and the preservation of the coral reefs.

The City of Fort Lauderdale is in Broward County, Florida. Broward County owns and runs Port Everglades, a commercial port. Port Everglades borders on the Atlantic Ocean and intracoastal waterway of Broward County. The federal government has enacted an anchorage ground for Port Everglades, pursuant to 33 USC 471, 33 CFR 109.05 and 33 CFR 110.186. The anchorage ground near Port Everglades consists of two anchorage areas, identified as A and B. The United States Coast Guard enforces the rules and regulations of these anchorage areas.

These two federally-mandated anchorage areas are located only about two miles off the shoreline of Fort Lauderdale and are dangerously close to the middle reef and outer reef of the coastline. (See attached, map of groundings). The National Coral Reef Institute has mapped the different groundings and anchor draggings over the last 12 years in this specific area (Exhibit 1). It is clear from Exhibit 1 that the precious coral reefs located near the coastline are being systematically destroyed by vessels waiting to enter Port Everglades.

There have been numerous newspaper articles written about the reefs in the Sun-Sentinel. The City is concerned that even though the Coast Guard is attempting to alleviate some of the problems with groundings and anchor draggings in recent months, there is an ongoing problem that requires a complete overhaul of the anchorage areas and movement of these areas to deeper water.

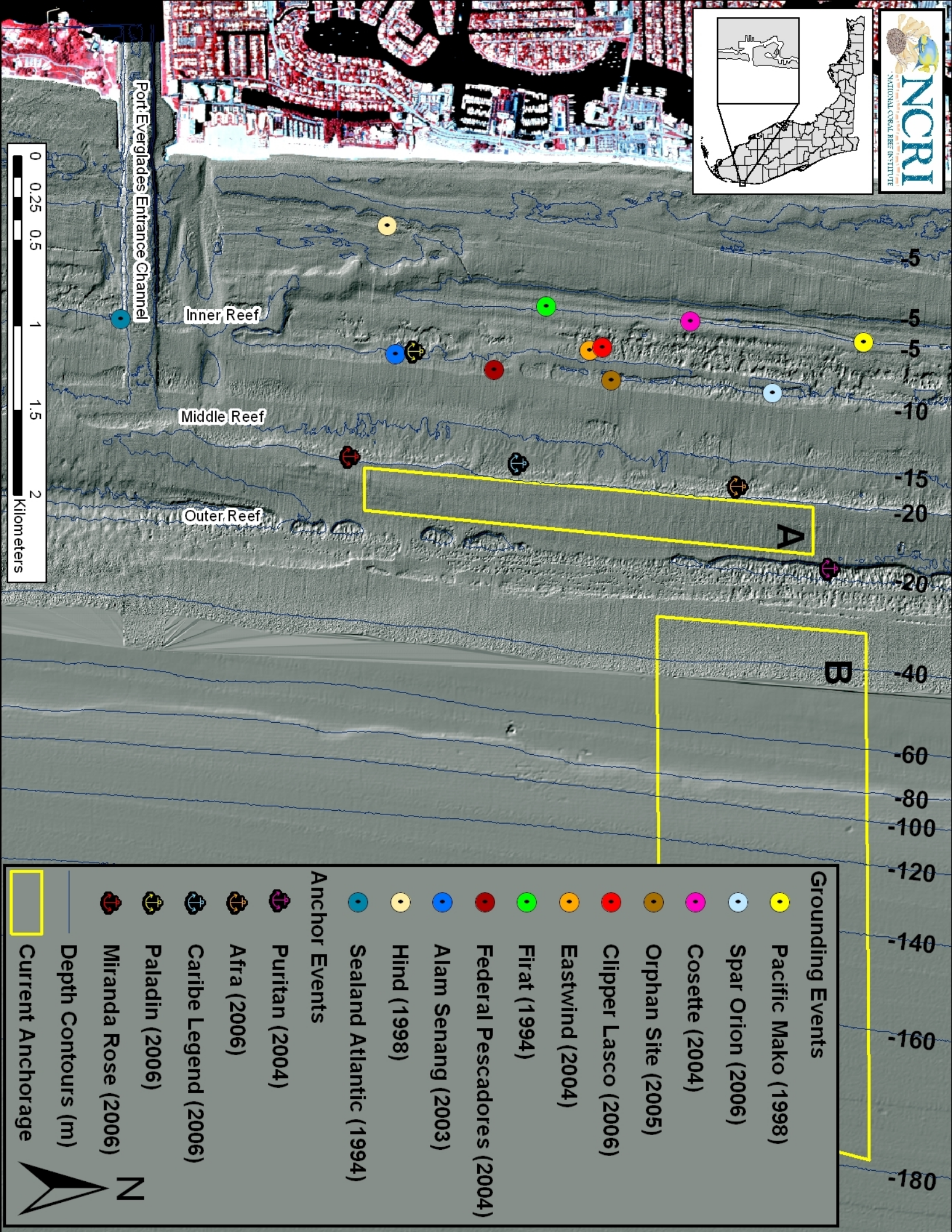
Anchorage area A is located in approximately 61 feet to 74 feet of water. Anchorage area B is

located in 100 feet to 200 feet of water. Anchorage area A is most commonly used by vessels coming into the Port. Anchorage area A is too close to the coral reefs located in shallow depths of the Atlantic Ocean. Additionally, there seems to be limited regulation of the movement of the vessels into and out of the Port to protect the sensitive coral reefs. Anchorage area B seems to be the better alternative of vessels to use to avoid damage to coral reefs, but it very close to the outer reef (See Exhibit 1). Also, area B is not being utilized by a majority of the vessels awaiting entrance into the Port, instead preferring to anchor at area A, in more shallow water.

We encourage the U.S. Coral Reef Task Force to protect and preserve our coral reefs and assist the United States Coast Guard in changing the location of the current anchorage grounds of Port Everglades, Florida (33 CFR 110.186) and strengthening the regulations of vessels entering these anchorage grounds and traveling into Port Everglades. Thank you for your anticipated assistance in this matter.

Sincerely,






Harry A. Stewart
City Attorney



Grounding Events

- Pacific Mako (1998)
- Spar Orion (2006)
- Cosette (2004)
- Orphan Site (2005)
- Clipper Lasco (2006)
- Eastwind (2004)
- Firat (1994)
- Federal Pescadores (2004)
- Alam Senang (2003)
- Hind (1998)
- Sealand Atlantic (1994)

Anchor Events

-  Puritan (2004)
-  Afra (2006)
-  Caribe Legend (2006)
-  Paladin (2006)
-  Miranda Rose (2006)

-  Depth Contours (m)
-  Current Anchorage



October 13, 2006

Beth Dieveney
U.S. Coral Reef Task Force Coordinator
Coral Reef Conservation Program
1305 East-West Highway
Silver Spring, MD 20910

Dear Ms. Dieveney:

As a Florida native for almost 50 years I have spent a great deal of time on our waters, at our beaches, and in our ocean. I have witnessed the decline in our water quality and the explosion of algae on our reefs. Dinoflagellates attack our fish and red tide attacks our lungs.

Urban and agricultural runoff are a big part of the problem and we need your best efforts to stop it. I know there are no easy answers and no overnight fixes but if you and your team act to take the strongest actions possible today that will be a big first step. A big step that you and your successors can build on. Educating politicians as to how truly dire the current ecological conditions are will help today and in the future.

Dumping semi-treated sewage into our coastal waters is inexcusable. Given all the science and knowledge we have today we know it must end. There is no reason other than economics that we allow municipalities to continue to dump their effluent into the waters where tourists swim and our children play. This is a factor of development and its solution should be a cost of further development. Please come up with an enforceable plan to phase out this third world practice.

Thank you for your hard work.

Sincerely,

Ned Stone
954 205 9595
2012 Coral Shores Drive
Ft. Lauderdale FL 33306-1240
ecodepot@aol.com

Dear Ms. Dieveney:

I am submitting these comments to be reviewed at the US Coral Reef Task Force Meeting to be held in St. Thomas on October 24-28, 2006.

I am outraged about the partially treated wastewater being discharged into the Atlantic Ocean by the Sewer Plant in Delray Beach Florida. It would be bad enough if the sewer plant was operating with a legal permit, but since 2005, the sewer plant has been operating without a permit as required by the Federal Clean Water Act. The Plant has not, and cannot, demonstrate that the discharge will cause no unreasonable degradation to the receiving environment. FDEP is in possession of data which shows quite the opposite, that the discharge is destroying the reef from the pipe exactly upcurrent northward to Boynton.

Action must be taken to require Delray Beach to build a sewage treatment facility that does not discharge wastewater into the Atlantic Ocean. This can be done over a five year period and with limited cost if properly planned.

I appeal to the US Coral Reef Task force, NOAA, USDEP, FDEP and other national, state and county agencies to give priority to requiring that Delray Beach immediately plan, fund and construct a sewer treatment facility that does not discharge partially treated waste water into the Atlantic Ocean.

Respectfully Submitted,



Ryan Stovka
508 Lincoln Court
Deerfield Beach, FL 33442
Email: rstovka@comcast.net

Elaine T. Textor
2890 Farragut Lane
West Palm Beach, FL 33409

U.S. Coral Reef Task Force Coordinator
Coral Reef Conservation Program
Attn: Ms. Beth Dieveney
1305 East-West Highway
Silver Spring, MD 20910

Via US Mail

Re: Delray Beach Sewer Plant

Dear Ms. Dieveney:

I am a Mom of a 3 year old and I just want to present the comments of people like me that even though we are not out at the ocean everyday we care immensely about what could happen to it. I want my daughter and her children to be able to enjoy the ocean and reefs too. Please take this comment to be reviewed at the US Coral Reef Task Force Meeting to be held in St. Thomas on October 24-28, 2006.

Partially treated waste has been a problem in the Atlantic Ocean around Florida, especially by the Sewer Plant in Delray Beach. I have seemed what the reefs used to look like and what they look like now. In compliance with the Federal Clean Water Act, I ask you to please do not allow this plant to continue to discharge sewer without a permit. The Plant has not, and cannot, demonstrate that the discharge will cause no unreasonable degradation to the receiving environment. Indeed, to the contrary, FDEP is in possession of data which shows quite the opposite, that the discharge is destroying the reef from the pipe exactly upcurrent northward to Boynton almost in a neat line.

Action must be taken to require Delray Beach to build a sewage treatment facility that does not discharge waste water into the Atlantic Ocean. This can be done over a 5 year period and with limited cost if properly planned.

I appeal to US Coral Reef Task force, NOAA, USDEP, FDEP and other national, state and county agencies to give priority to requiring that Delray Beach immediately plan, fund and construct a sewer treatment facility that does not discharge partially treated waste water into the Atlantic Ocean.

Sincerely,


Elaine T. Textor

Dear Beth Dieveney,

I would like to voice my concerns regarding the Delray Beach Sewer Plant. It has recently been brought to my attention that the plant has been operating without a permit since 2005 as required by the Federal Clean Water Act. This, in spite of overwhelming data correlating the discharge and subsequent nutrients which allow algae to overpopulate and smother some of Florida's last remaining reefs. It is my understanding that the U.S. Coral Reef Task Force will be meeting in St. Thomas in October, and it is my fervent hope that this issue will be addressed and solutions postulated.

Thank you in advance for your work and dedication to preserving our coral reefs.

Respectfully,


Rafael Toledo
2037 S. Seacrest Blvd Apt C
Boynton Beach, FL 33435
superkiko41@hotmail.com

I am submitting these comments to be reviewed at the US Coral Reef Task Force Meeting to be held in St. Thomas on October 24-28, 2006.

My concern surrounds the problem of partially treated waste water being discharged into the Atlantic Ocean by the Sewer Plant in Delray Beach Florida. Since 2005, the sewer plant has been operating without a permit as required by the Federal Clean Water Act. The Plant has not, and cannot, demonstrate that the discharge will cause no unreasonable degradation to the receiving environment. Indeed, to the contrary, FDEP is in possession of data which shows quite the opposite, that the discharge is destroying the reef from the pipe exactly upcurrent northward to Boynton almost in a neat line.

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Respectfully Submitted,

PCV Tonya Wagner
tonya_wgnr@yahoo.com
3129078863
23033 PCH # 216
Malibu, CA 90265

Jane West
15629 95th Ave N.
Jupiter, FL 33478

September 29, 2006

Re: Delray Beach Sewage on our reefs

Dear Ms. Dieveney:

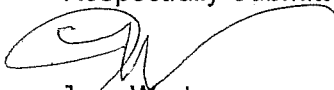
I have been snorkeling and diving Palm Beach County's beautiful coral reefs for years. I am **disgusted** by the partially treated sewage that is being spewed out of the Sewer Plant in Delray Beach. To that end, I am submitting these comments to be reviewed at the US Coral Reef Task Force Meeting to be held in St. Thomas on October 24-28, 2006.

My concern surrounds the problem of partially treated waste water being discharged into the Atlantic Ocean by the Sewer Plant in Delray Beach Florida. Since 2005, the sewer plant has been operating without a permit as required by the Federal Clean Water Act. The Plant has not, and cannot, demonstrate that the discharge will cause no unreasonable degradation to the receiving environment. Indeed, to the contrary, FDEP is in possession of data which shows quite the opposite, that the discharge is destroying the reef.

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Respectfully Submitted,



Jane West
(561)748-8478
jwest@collins-west.com



CORALATIONS

conserve • nurture • educate
conservar • cuidar • educar

www.coralations.org

P. O. Box 750

Isla de Culebra, PR 00775

1-877-77CORAL / 1-877-77(2-6725)

(o) 787-556-6234 (f) 530-618-4605

EMAIL: maryann@coralations.org

Oct 13, 2006

CORALations is an award winning, non-profit, Caribbean coral reef conservation organization based on the island of Culebra, Puerto Rico. CORALations founded in San Juan Puerto Rico in 1995. The organization works in partnership with local island communities to protect and restore their coral reefs. CORALations mission is: To Conserve, Nurture and Educate.

We request the Task Force to address three major concerns:

- **The impacts on coral reefs from global warming, and the need for the United States to take strong actions to reduce its emissions of greenhouse gases.**
- **The need to establish local island based immediate coral rescue response teams. These teams would be trained to assess damage to area corals and rescue and stabilize corals impacted by physical damage such as storms and ever increasing oil tanker and recreational boat groundings in this region. (see attachment 1)**
- **We ask the Task Force to revisit concerns presented in 1999 regarding the continued reliance on large primary waste water treatment systems with ocean discharge in Puerto Rico. Today the problem is worse, with increased flows and miserable track records of compliance to even primary removal standards. Despite poor compliance records, flows at the plants are increasing now providing a false infrastructure that supports unsustainable coastal development.**

REDUCING GREENHOUSE EMISSIONS – IF NOT US, WHO?

The impacts of coral bleaching, related to global climate change, have been extensive, destructive, and well-documented – especially within the Caribbean region. Within just the past six months, we have witnessed a 70% mortality on large coral colonies, some ten feet tall, and ten feet wide, that have survived since the time of Columbus. Aronson and Precht conclude in an article published April 2006 in Coral Reefs that the implementation of regional management practices to address over-fishing can at best have only a limited impact on coral recovery unless policy makers confront the accelerating negative effects of the global-scale sources of coral mortality. To date there are over 200 articles published by the National Academy Press on the issue of global warming warning of the impacts now being experienced today in the Caribbean. Coral reefs suffer a wide range of impacts from this increase in sea surface temperatures. Corals are subject to physical damage caused by storms which

are predicted to gain in strength and frequency. Corals are also vulnerable to disease caused by bacteria and virus that proliferate in warmer waters. Inadequate waste water treatment and the discharge of industrial waste into our oceans is actually feeding organisms pathogenic to corals (and humans) Caribbean coral reefs are the shared resources of all the island nations of the region. The people of Caribbean islands both in and outside of U.S. territorial jurisdictions are impacted by this loss, as island peoples are inexorably connected to this critical resource.

Most, perhaps all, of the NGOs involved in coral reef issues are united in calling for the United States government to exercise global leadership by addressing the issue of global warming and the immediate need to reduce United States emissions of greenhouse gases. - Leadership which states, local governments, and private citizens have recently begun to exercise in the absence of a vigorous federal commitment. We add our voice to the many who call for this leadership, and urge the Task Force, as the entity responsible for federal actions to reduce emissions and thereby protect Caribbean coral reefs. We ask that you send a loud and clear message upward in the chain of command in support of our voices.

RESTORING CORAL REEFS

We need a commitment from government to allow timely emergency stabilization of coral reefs impacted by storm events and ship groundings such as the April 27, 2006 grounding of the Magara, off Puerto Rico. This was the largest tanker grounding on coral in the history of the U. S. In the case of the Magara, we believe the high rate of mortality of the coral fragments from this grounding event could have been avoided had NOAA relied on the immediate stabilization of these fragments offered by a local team of experts. According to the NOAA press release dated August 17, 2006, although the grounding occurred April 27, the “time-sensitive task of securing salvaged corals with underwater cement” did not begin until July 24. The emergency response team of locals, documented the impact to endangered acroporids, documented contamination of anti fouling paint, and advised local government on immediate stabilization procedures. We later learned that NOAA is now using some of the same members of the first response team we assembled to stabilize corals, albeit months after the grounding.

Of more concern seems to be the correlation between government response and liability. We see a *slow* response from Government both local and Federal to groundings for ships with litigable flags from countries that recognize their responsibility to restoration. We see *no* response from Government when the flagged vessel would not be liable such as in the case of the Russian tanker the Sperchious that grounded last November, also on coral reefs off Guayanilla Puerto Rico.

We would also like to see support for our local activities seeking to provide a stock of “farmed” *Acropora cervicornis* to be available for restoration of damaged existing reefs and for responding to emergency events.

It should be noted also that two 750 foot long oil tankers grounded on coral reefs off Guayanilla Puerto Rico this last year because they failed to hire a pilots and they were not using modern navigation tools.

A plane crash in the natural reserve area on Culebra and water quality concerns triggered federal and local agency oversight. The plane was leaking fuel and fluids and took a week to remove. Agencies relied on the responsible party for removal and a decision was made to move the leaking plane to a

beach located at the heart of the reserve. The agencies relied on the responsible party, who had no salvage experience and was observed drinking alcohol during the removal process.

Recreational boaters are taking their toll on the Culebra archipelagos as well. An average of 120 motor boats can be found tied together in shallow areas of the bioluminescent bay on Culebra over every holiday weekend. Recreational boat groundings on reefs are now common weekend events. Culebra sea grass is also impacted regularly by prop damage. This in an area where all sea grass is listed Resource Cat 1 Critical Habitat and considered irreparable if destroyed.

Given the overall percent decline in Caribbean reefs over the past 30 years, we know that those corals living today may be representative of more resistant organisms in the population. We ask the Task Force to provide support for training teams of locals with the knowledge and skills necessary to rapidly rescue corals impacted by physical damage. An immediate response team using low tech stabilizing techniques can rescue and stabilize corals impacted by physical damage, whether from storm, anchor, vessel grounding or grounding removal damage. Local immediate response teams can prevent coral mortality from physical impacts while creating restoration jobs for talented locals. The teams could be trained on how to establish meaningful partnerships within each coastal community to maximize human and financial resources associated with the stabilization, while fostering local stewardship and oversight for the areas restored.

The fast growing acroporids impacted by physical damage can grow into new colonies from fragments that are properly stabilized, is an enormous conservation opportunity in this region. We hope the Task Force can insure that the threatened listing is not used to restrict permits for such activities, when low tech stabilization techniques are already proven, simple and cost effective to implement. The permitting process should be geared at allowing emergency stabilizations of these species after storms and groundings.

COASTAL CLEAN WATER PUERTO RICO

Since presenting these issues in 1999, we understand that the discharge limits for many of the primary plants have been increased. A consent decree written by the Environmental Protection Agency and the Department of Justice against the Puerto Rico Aqueduct and Sewer Authority (PRASA) acknowledges serious problems with these primary plants. The press release issued by EPA June 22, 2006 claims that *“Once actions are taken under the civil consent decree and plea agreement, the quality of the environment in the Commonwealth of Puerto Rico will be improved.”* The decree reads quite differently, eliminating the monitoring of parameters that are typically required by the EPA, including Fluoride and Phenolic substances. The decree only requires monitoring of Biological Oxygen Demand (BOD) and Total Suspended Solids (TSS), without establishing limitations. In the absence of limitations, there is a risk of violation of Water Quality Standards.

Many of the parameters whose effluent values were lifted or removed were those parameters the primary plants were consistently out of compliance on.

While we concur with the EPA and DOJ findings of a repeated history of CWA violations by PRASA, but question the efficacy of imposing a \$9 million dollar fine on a cash-starved government agency. As we noted in our public comments on the Consent Decree, we believe it would be better to seek injunctive relief at some of the chronic violating PRASA facilities, such as Ponce RWWTP.

Increase in effluent limits for the Carolina (Loiza) plant lifted a sewer ban that now is supporting more development on this already stressed, ecologically sensitive coastline. Plans for a controversial hotel project proposed for construction on one of the coastal barrier islands will impact the sole storm evacuation route for very poor Afro-Antillean community. In this post-Katrina era, we should be discouraging, not encouraging development on such vulnerable coastal barrier islands, especially at what is predicted to be a threat to life in a poor community. In the case of the Carolina plant this egregiously non-compliant primary facility should not be serving as infrastructure for more development. This subsistence fishing community is already impacted by the outfall that consistently failed to meet primary removal compliance standards even at previous discharge limits.

Since first raising this concern with the Task Force in 1999, we have had to sue EPA to update Puerto Rico's coastal water quality standards. We are currently co-plaintiffs with the American Littoral Society and with the support of the Mid Atlantic Environmental Law Clinic sued PRASA for non-compliance of permit effluent limits at the Ponce plant. While litigating this case EPA issued the primary plant in Ponce, Puerto Rico, a Clean Water Act waiver.

We urge the Task Force to exercise its oversight responsibilities under Section 2 of Executive Order 13089, and require the EPA and Department of Justice to revisit the Consent Decree in particular by re-instating effluent limitations subject to monitoring and enforcement, so as to meet the requirement that the Consent Decree will not "degrade the conditions of such (coral reef) ecosystems." We also urge the Task Force to move agencies to cap discharge from these plants and then work toward re-tooling plants to meet advanced secondary removal standards consistent with the Clean Water Act.

In closing we quote from the Caribbean poet Derek Walcott's 1992 Nobel acceptance speech:

"A morning could come in which governments might ask what happened not merely to the forests and the bays but to a whole people."

Support documents are available upon request.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mary Ann Lucking', with a long, sweeping flourish extending to the right.

Mary Ann Lucking
Director

October 13, 2006



This photo was taken by NOAA and featured in an online news release about the Magara grounding in Puerto Rico. The photo shows Staghorn corals (*A. cervicornis*) that have been fragmented, died and are now being overgrown by algae.

An immediate response team using low tech stabilizing techniques can rescue and stabilize corals impacted by physical damage, whether from storm, anchor, vessel grounding or grounding removal damage.

Local immediate response teams can prevent the mass mortality seen in the photo above while creating restoration jobs for talented locals. The teams could be trained on how to establish meaningful partnerships within each coastal community to maximize human and financial resources associated with the stabilization, while fostering local stewardship and oversight for the areas restored.