



SIERRA CLUB COMMENTS FOR THE U.S. CORAL REEF TASK FORCE

February 24, 2011 Meeting in Washington, D.C.

These comments are submitted on behalf of the Sierra Club by Dr. Judy Lang on behalf of the Sierra Club's Marine Action Team, Coral Reef Working Group. Our chair, Dave Raney, regrets that he will not be joining you in person.

We note from the agenda that this meeting will discuss the relationship of the Task Force to the National Ocean Policy (NOP) framework. The Sierra Club has submitted extensive comments on the NOP and on the related scaffolding for coastal and marine spatial planning (CMSP). We are presently reviewing and commenting on the Strategic Action Plans for implementing the NOP. Within this broader context, we offer the following comments:

- The regional approach taken for CMSP should work well for contiguous mainland states, but poses some challenges for island state and territories within the Caribbean and the Pacific Islands regional planning areas. Fortunately, there is a long history of communications and cooperation among island entities (including the "Island of Florida") within the All Islands Committee of the Task Force, and among the various Coastal Zone Management programs. We trust that implementation of the NOP will be aided by recognition of these well-established relationships. Although the island entities are separated by great distances, their coral reefs share many common threats such as land-based sources of pollution, overfishing, rising sea levels, increases in seawater temperature and, presumably, hurricane intensity, and ocean acidification. At the same time, ocean currents connect geographically separate reef populations, transporting living organisms (natives as well as alien invaders) – some of which are pathogens – along with pollutants and trash and all without regard for the NOP's regional boundaries. For better and worse, flowing seawater links the Flower Garden Bank reefs in the CMSP's Gulf of Mexico region to those of the CMSP's Caribbean and South Atlantic regions, as well as to international reefs located around the Caribbean, Bahamas, Gulf of Mexico and even in Bermuda. Connectivity such as this cannot be ignored as we strive to conserve what remains of our coral reef ecosystems and respect the socioeconomic needs of associated coastal human populations.
- Nevertheless, as we have stressed before in our comments to the Task Force, many of the most crucial decisions impacting coral reefs will be made at the local and state levels. In some cases, it appears that the most important previous decision was made when a local bulldozer operator cut an access road on a steep hill. The Local Action Strategies supported by the Task Force acknowledge the importance of local decisions and actions. While regional planning is important for coral reef resources, regional planning bodies must seek input from state and local governments, non-governmental agencies (NGOs), and the general public. Although states and territories are members of regional ocean councils, local governments are not. And while some regional planning bodies may include advisory committees to obtain additional inputs, there must also be provisions for local governments, NGOs, and the general public to submit comments directly on proposed regional plans.

- Marine spatial planning may lead to “ocean zoning” in some instances, especially those related to designation of relatively permanent sites for ocean-based facilities, or for conservation purposes such as marine protected areas. Whilst acknowledging the need for ocean zoning in certain circumstances, it is important to recognize that the ocean and coastal areas belong to the public, and governmental agencies must act as stewards – a duty the proposed NOP recognizes and embraces – for these public trust areas. We must guard against ocean zoning approaches based on “stakeholder” inputs that might result in a carving up of the ocean and coastal zone by powerful special interests. We must assure that any framework for ocean zoning recognizes that the most important stakeholders are the current and future generations of citizens to whom the natural resources at stake belong. This means making sure that citizens and public interest groups have opportunities for input into decision making beyond that sometime provided through memberships on advisory committees!
- The prospect of the federal waters becoming the path of least resistance for siting of alternative energy facilities, ocean aquaculture, and other uses of ocean areas must be avoided. A small-scale, but perhaps symbolic, example of this is occurring off the island of O’ahu in Hawai’i. There a shark-watching activity opposed by local residents takes place three miles offshore, where it is exempt from state and county regulations. The potential for a similar pattern exists with the siting of the other ocean uses mentioned above. Federal, state, and local regulations need to be well-integrated because otherwise the siting of ocean facilities may be driven more by individual agency permitting processes than by ecosystem-based marine spatial management.

At a time when so many coral reef organisms are succumbing to the effects of bleaching or disease, not to be overlooked is the need to support high-quality, basic research, accompanied by honest outreach education, on the causes and effects of disease, pollutants, disrupted food webs, and other stressors affecting reef communities.

As the Sierra Club and other environmental non-governmental agencies strive to grow a clean energy economy in the U.S., we remind our state, territorial, and federal partners that we all share responsibility for Earth’s currently changing climate. To the extent to which you can actively limit your agency’s contribution to the emissions of greenhouse gases that are devastating the natural beauty, diversity and productivity our blue planet and imperiling future generations, you will be helping to create positive “reference benchmarks” for the nation and the rest of the world!

We also note that the last item of the agenda will be a meeting of the Steering Committee to discuss Follow Up items. We are glad to see this change in agenda structure, and trust it will include discussions of follow up items related to issues raised in public comments.

Thank you for the opportunity to submit these comments.