



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

February, 2010 Meeting in Washington, D.C.

These comments are submitted on behalf of the Sierra Club by Dave Raney and Dr. Judith Lang of the Sierra Club's Marine Action Team, Coral Reef Working Group. We regret that we will not be joining you in person for this meeting,

The United States Coral Reef Task Force (USCRTF) was established by a Presidential Executive Order in 1998 "to lead U.S. efforts to preserve and protect coral reef ecosystems." Mortality from global warming plus associated diseases are widely understood to be major drivers of the recent decline of coral reefs, which are considered by the USCRTF to be in "crisis" (<http://coralreef.gov/about/>). It is feared that increasing acidity of oceanic waters will further threaten the survival of calcareous reef organisms and increase erosion of reef frameworks (*e.g.*, Honolulu Declaration. 2008).

While the USCRTF focuses on the impacts of climate change on coral reef ecosystems, which are geographically limited, the efforts by the United States to reduce its emissions of greenhouse gases (GHG) must be nationwide in scope. Many states and local communities, including members of the USCRTF, have taken initiatives to reduce their GHG emissions, while a divided U.S. Congress has thus far failed to act. As discussed below, President Obama has also taken initiatives to reduce GHG emissions within the scope of his authority over federal agencies.

We have reviewed the report of the USCRTF Climate Change Working Group (CCWG), titled "Response to the Honolulu Declaration on Ocean Acidification and Reef Management," which was presented at the Task Force meeting in Puerto Rico, October 30, 2009. We compliment the CCWG for their comprehensive report, and for the initiatives by USCRTF members that the report identifies. Key among these are the Executive Orders issued by the Governors of Florida and American Samoa, legislative action by Hawai'i, and other actions underway by agencies in CNMI, Guam, and the U.S. Virgin Islands.

The CCWG report also identified actions to reduce GHG by federal agencies, including regulatory actions by the EPA under the Clean Air Act, and the Department of the Interior's Carbon Footprint Project, through which DOI will develop a unified program that includes setting a baseline and reduction goal for the Department's greenhouse gas emissions and energy use. The U.S. Fish and Wildlife Service is particularly commended for setting the ambitious goal of becoming carbon neutral in its activities by the year 2020. According to its "Strategic Plan for Dealing With Accelerating Climate Change," released for public comment September 21, 2009, the FWS pledges to achieve carbon neutrality with strategies that include reducing the carbon footprint of its operations and by programs for biological carbon sequestration.

These are commendable initiatives undertaken by federal agencies. We note, however, that under President Obama's Executive Order 13514, "Federal Leadership in Environmental, Energy, and

Economic Performance”, all federal agencies are now mandated to undertake programs to measure, and reduce their GHG emissions. Executive Order 13514 was issued on October 5, 2009, apparently too late to be incorporated in the CCWG’s report to the Task Force in Puerto Rico. We applaud this action by the President, and urge all agencies, state, territorial, and federal, to follow the example of the U.S. Fish and Wildlife Service and seek the holy grail of carbon neutrality.

Looking beyond the actions by governmental agencies, the reluctance of the U.S. Congress to act on climate change indicates that more effective efforts are required to build support among the public for strong climate change legislation. We assure you that, as part of its major Initiative to Limit Total Greenhouse Emissions, the Sierra Club is working hard to mobilize public support for “real action” on global warming.

In our public comments submitted to the Task Force for its meeting in Puerto Rico, we supported the petition by Palm Beach County Reef Rescue to extend the northern boundary, at Palm Beach, Florida for the critical habitat designation for staghorn coral. We are disappointed in the January 22, 2010 Federal Register announcement that the National Marine Fisheries Service has denied the petition because its heavy workload precluded appropriate agency review.

Thank you for the opportunity to submit these comments.