

**Public Comments  
on the U.S. Commission on Ocean Policy's Preliminary Report**

*Topic Area: Corals*

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**Comments Submitted by:**

- Kristine Herrington, Ventura, California
- Robert E. Schroeder, Honolulu, Hawaii
- DeeVon Quirolo, Reef Relief
- Jerry and Gary Findlay, San Clemente, California

## Comment Submitted by Kristine Herrington, University of California

June 1, 2004

First, I want to thank and congratulate all members of the U.S. Commission on Ocean Policy for their work in producing the preliminary report. I believe the U.S. is in desperate need of a new ocean policy, and I hope this report is a successful driver in establishing that policy. I would like to address my comments specifically on recommendations for coral reefs and coral reef resources.

The preliminary report successfully highlights the benefits of coral reefs, their various biological, ecological, economical, aesthetic, cultural and intrinsic values, and identifies the essential ecosystem functions they provide. The report also identifies threats to coral reefs and coral reef resources that are leading to the decline of corals worldwide.

However, the preliminary report recommendations specifically addressing coral reefs pertain primarily to identifying information gaps and providing for funding of research and monitoring, but fail to specifically identify management methods to protect and conserve corals and coral reef resources.

The Pew Oceans Commission report spends a significant portion of their report identifying how zoning could be used to address several marine resource management issues. Additionally, zoning in the Great Barrier Reef Marine Park has proven successful for protecting corals and managing for multiple uses since the Park's establishment in 1975. Day (2002) reviewed the use of zoning in the Great Barrier Reef Marine Park, and found zoning was most successful for separating conflicting uses. In the paper, Day discusses what aspects of zoning were not as successful, and how changes or improvements could be made if zoning was to be incorporated into marine resource management regimes elsewhere in the world. Specifically, Day identifies public involvement and managing at various regional scales (both of which have been recommended in the Commission report) as beneficial to the zoning process.

Therefore, in the U.S.:

·Zoning around coral reefs could create a buffer to protect the reefs from damaging uses, while allowing other undisruptive uses to still occur. ·Zoning would allow for multiple uses to occur on and around coral reefs, but would spatially separate the uses, to aide in protection and management of coral reef resources. ·Zoning could first be implemented within the National Marine Sanctuaries where NOAA already has dedicated staff working on resource management issues specific to that region. ·Eventually, zoning could occur for the entire offshore waters of the U.S., but could be more detailed and protective within the Sanctuaries, and other parts of the water/coastline already designated with special status (such as national seashores, national parks, marine reserves, etc.). ·Zoning definitions could be determined at the regional level, incorporating the local public as much as possible.

Zoning should be considered as a valuable tool in a new ocean policy for the United States. Zoning has proven useful to protect coral reefs while managing for multiple uses, and could be applied to protect other sensitive marine ecosystems as well. Prior

to submitting the final report to Congress, I recommend the U.S. Commission on Ocean Policy review the zoning practices of the Great Barrier Reef Marine Park Authority and explicitly recommend using zoning as a marine management strategy for the new U.S. ocean policy.

Thank you,

Kristine Herrington  
Ventura, California

## **Comment Submitted by Robert E. Schroeder, Honolulu, Hawaii**

May 20, 2004

\* Overall, the report is well written, particularly in its emphasis on the ecosystem-based approach to management that necessarily requires an increased national effort in scientific research to define the nature and extent of our valuable marine ecosystems and component living resources.

\* Chapter 21 (Preserving Coral Reefs and Other Coral Communities) should be separated into two chapters, so as not to confound tropical reef-building corals with ecologically different deep- or cold-water corals. If the intent is to truly follow the ecosystem approach, the latter should be retained for a chapter on deep-water ecosystems. Deep-water corals are less threatened, so artificially elevating them to the level of tropical coral reefs, considered by many to be at crisis-level for conservation attention, only detracts from the urgent research priorities and mitigation effort. In addition, in the Western Pacific Region, a Fishery Management Plan (FMP) has been in existence for deep-water (precious) corals for nearly two-decades, while the FMP for coral reef ecosystems has only recently been developed.

\* The statement at the top of p-263: "Worldwide, no pristine, undamaged warm-water coral reefs remain" is a bit extreme (and inaccurate), as is the statement that follows: "Only the coral reefs in the Northwest(ern) Hawaiian Islands (NWHI) are in near pristine condition..." Other coral reef ecosystems exist in the US Pacific that are undamaged and are in equal or more "pristine" and healthy condition than those of the NWHI (e.g., Howland, Baker and Jarvis Island, Kingman Reef, etc. [pers. obs.]).

Thank you for providing us the opportunity to comment.

Robert E. Schroeder, Ph.D.  
JIMAR/PIFSC Coral Reef Ecosystem Division  
NOAA Fisheries & Ecosystems  
Kewalo Research Facility  
Honolulu, Hawaii

## **Comment Submitted by DeeVon Quirolo, Reef Relief**

May 13, 2004

Honorable Jeb Bush  
Governor of the State of Florida  
The Capitol  
Tallahassee, Florida 32309

Re: Florida's Recommendations to the U.S. Commission on Ocean Policy

Dear Governor Bush:

Reef Relief is a grassroots membership organization with thousands of members throughout Florida and thousands more who live all over the United States and visit Florida who support our efforts to protect Florida's endangered coral reefs. We appreciate the opportunity to submit our comments to you regarding the state's review of the U.S. Commission on Ocean Policy report.

The preliminary report correctly recognizes that America's coastal waters are in dramatic decline and that more must be done if we are to insure clean ocean waters, healthy beaches and coral reefs and abundant fisheries for generations to come. Indeed, action is needed immediately to restore the coral reefs of the Florida Keys, which are amongst the most endangered in the world. We respectfully ask that the State of Florida consider the following recommendations for your comments on the report:

**1. A universal commitment to advanced nutrient removal wastewater treatment for America's coastal areas that are home to coral reefs.** The report recommends advanced nutrient removal treatment for impaired waters. Many of Florida's coastal areas are at risk due to nutrient loading and coral reefs need clear, clean, nutrient-free waters to thrive. Advanced wastewater treatment removes harmful nitrates and phosphates that sponsor algal blooms, fish die-offs and coral loss. **This commitment must include additional funding from the state and federal level to upgrade current sewage treatment, especially in the Florida Keys.** You have shown a commitment to address this issue in the Florida Keys by allocating \$10 million toward advanced waste treatment this year and your past support helped make it possible for the City of Key West--along with Reef Relief's multi-year efforts--to upgrade treatment to this high standard. We agree with the report that non-point source pollution is an urgent issue. We recommend that waste injected into shallow and deep wells throughout South Florida be included, since the effluent migrates into coastal areas. Such injections also violate the Clean Water Act and endanger underground sources of drinking water.

**2. Establishment of no discharge zones for boater sewage are needed to help insure clean ocean waters, especially in areas of coral reefs.** Another Reef Relief initiative is to improve water quality through No Discharge Zones. The Florida Keys No Discharge Zone has been established and currently extends to all state waters but not the federal waters of the Florida Keys National Marine Sanctuary. You have demonstrated strong leadership by nominating first Key West and then all state waters in the Florida Keys for this designation. We recommend that all federal sanctuary waters of the Florida Keys be included in the No Discharge Zone for boater sewage. This will help insure that boat sewage discharges are not contributing to the reduction in

biodiversity and the increased occurrence of coral disease and loss of coral cover that is accelerating within the Florida Keys National Marine Sanctuary.

3. Cruise ships are a major and increasing economic engine for the State of Florida. Unfortunately, they are also a major new source of degradation to Florida's ocean waters due to the recent growth of the industry in such ports as Key West. **Reef Relief recommends that all cruise ships be required to install advanced nutrient-removal wastewater treatment onboard or in the alternative, be required to pump-out their sewage when entering Key West and other ports of call in Florida.** Facilities should be provided for these floating cities in Port Everglades and other ports of call throughout Florida, which discharge thousands of gallons of sewage into our ocean waters. At Reef Relief's request, the City of Key West is currently planning an effort to require that all cruise ships use vessel pump-out facilities for their black water as a condition of entering this port. Current legislation pending in Congress would restrict cruise ship discharges to international waters. We recommend that all cruise ship waste discharges, even those in international waters, be restricted to that which is treated to tertiary, nutrient-stripped levels for areas affecting Florida's sensitive marine environment. Our coastal areas are directly impacted by the Gulfstream and waters outside state or federal territorial limits where cruise ships routinely dump inadequately-treated sewage.

4. **No oil drilling or exploration should be allowed in sensitive Florida waters.** Florida's residents have said time and again that we are opposed to offshore oil, leading to current protections. Offshore oil development and exploration is a threat to all Florida waters, our fisheries and our coral reefs. These hard-fought current protections for Florida's coastal waters should be continued in the sensitive waters of the eastern Gulf and other areas that can affect our shorelines, beaches and coral reefs. Caution should be exercised to insure that federal funding established by oil and gas revenues do not become a rational or encouragement for new offshore oil development in sensitive marine environments.

5. **The CERP should specifically address the role of nitrogen and its removal in the many aspects of the restoration project to insure the delivery of clean water downstream.** The Comprehensive Everglades Restoration Plan is a multi-billion dollar federal/state effort to save the River of Grass. Yet the National Academy of Science's CROGEE commission has reported that the current plan lacks an assessment of the need to remove harmful nutrients such as nitrogen from the agricultural runoff that reaches phosphorus-rich Florida Bay and coral reefs of the Florida Keys. Reef Relief recommends that the downstream coral reefs of the Florida Keys be protected from harmful runoff by the removal of nitrogen, not just phosphorus, from any water reaching Florida Bay.

We appreciate and thank you for your past efforts to protect Florida's endangered coral reefs, and urge you to consider these comments to increase protection into the future. The science is clear—our oceans are in trouble. We have the means to reverse this decline. Let's turn the tide!

Very truly yours,

DeeVon Quirolo  
Executive Director  
Reef Relief  
Key West, Florida

## Comment Submitted by Jerry and Gary Findlay, San Clemente, CA

April 21, 2004

### CORAL DESTRUCTION

We love Hawaii, and have been visiting each year for over twenty years.

One of our favorite activities while we are here is snorkeling. Each time we go snorkeling, we see someone damage the coral in many ways. They touch it, stand on it, break it off, kick it, etc. Most of the time, this is done because the people are unaware of how delicate the coral is -- nor do they realize how long this beautiful treasure takes to grow and how it supports an entire eco system.

This could be partially solved by educating the loads of tourists flying to Hawaii. Every visitor must fill out the agricultural form before landing in Hawaii. Educational information could be (and should be!) included along with this form, as well as incorporating it in the video about Hawaii that is shown by many of the airlines.

We are extremely concerned that our grandchildren may not be able to enjoy Hawaii's lovely underwater world of coral and fish, because it simply will not be there. It is a precious gift. Please print this letter and start the effort to get help on the way to save this irreplaceable wonder!

Sent in the true spirit of Aloha...  
Jerry and Gary Findlay  
San Clemente, CA