CSAW
Campaign to Safeguard
America's Waters

Earth Island Institute


June 15, 2009

U.S. Environmental Protection Agency
EPA Docket Center (EPA/DC) Water Docket, MC 2822T
1200 Pennsylvania Avenue, NW
Washington, DC 20460
Email: OW-Docket@epa.gov

Re: Ocean Acidification and Marine pH Water Quality Criteria, Docket No. EPA-HQ-OW-2009-0224

Dear Administrator Jackson,

On behalf of the American Fisheries Society, Blue Ocean Institute, California Coastkeeper Alliance, Campaign to Safeguard America's Waters, Center for Biological Diversity, Clean Water Network, CORALations, Coral Reef Alliance, Environmental Defense Center, EPIC (Environmental Protection Information Center), Friends of the Earth, Greenpeace USA, Gulf Restoration Network, Humboldt Baykeeper, International Center for Technology Assessment, KAHEA: The Hawaiian-Environmental Alliance, Marine Conservation Biology Institute, Niijii Films (producers of A Sea Change: Imagine a World without Fish), Northcoast Environmental Center, Oceana, Pacific Environment, Palm Beach County Reef Rescue, People

for Puget Sound, Reef Relief, Sailors for the Sea, San Francisco Baykeeper, Santa Barbara Channelkeeper, Southeast Alaska Conservation Council, Turtle Island Restoration Network, Western Nebraska Resources Council, Wildcoast, and Xerces Society, we thank you for the opportunity to submit information on ocean acidification for the Environmental Protection Agency (EPA) to consider during its review of water quality criteria under the Clean Water Act. We support EPA's call for data and information and urge EPA to adopt stringent water quality criteria that adequately protect marine life from ocean acidification.

Ocean acidification is a serious threat to our ocean ecosystems. Carbon dioxide pollution, primarily from fossil fuel use, is changing seawater chemistry more rapidly than anything that oceans have experienced in millions of years. These corrosive waters impair the ability of plankton, corals, and shellfish to build their protective shells. It also compromises other biological functions of wildlife including fish. The consequences of ocean acidification will impact ocean ecosystems, coastal resources, and our economy.

The threat of ocean acidification should be at the top of priorities for ocean conservation. Carbon dioxide is fundamentally changing ocean chemistry with devastating impacts on wildlife. Unless carbon dioxide emissions are stabilized, scientists predict that rising ocean acidity could cause a collapse of the world's fisheries. The science that has developed concerning ocean acidification over the past decade indicates that this is a water quality problem needing serious attention and urgent action.

The Clean Water Act's goal is to "restore and maintain the chemical, physical, and biological integrity of the Nation's waters." Thus, the EPA and states have had decades of experience protecting our nation's waters from pollution under this law. EPA has the authority and the duty under the Clean Water Act to protect seawater quality from ocean acidification.

EPA should strengthen its water quality criteria to ensure the maintenance and protection of ocean life and habitat. EPA is also encouraged to publish guidance on ocean acidification to enable coastal states and water quality managers to monitor and develop approaches to ocean acidification.

We applaud EPA for taking action on this important issue and hope to see further steps to address the problem of ocean acidification.

Sincerely,

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