

Congress of the United States
Washington, DC 20515

April 29, 2011

Chairwoman Nancy Sutley
National Ocean Council
Council on Environmental Quality
722 Jackson Place, NW.
Washington, DC 20503

Director John Holdren
National Ocean Council
Office of Science and Technology Policy
725 17th Street NW
Washington, DC 20502

Dear Chairwoman Sutley and Director Holdren,

We are writing to comment on the development of Strategic Action Plans for the nine priority objectives identified in the National Policy for the Stewardship of the Ocean, our Coasts, and the Great Lakes, established under Executive Order 13547.

The United States has exclusive environmental and economic jurisdiction over approximately 4.5 million square miles of ocean, which supports 2.3 million jobs and generates more than \$138 billion annually. It has also been projected that nearly 75 percent of the U.S. population will live in coastal counties by 2025. Given the heavy burden that we continue to place on our oceans and coasts, we commend the National Ocean Council for addressing some of the most pressing challenges to ensure healthy oceans for present and future generations.

We offer comments on the nine priority objectives, the development of strategic action plans for said objectives, and examples of opportunities, obstacles, and ways to gauge progress, as follows:

Ecosystem-Based Management

This management approach affords the opportunity to preserve and restore ecosystems to ensure that the necessary services they provide will be available now and well into the future. Ecosystem-based management should work to reveal the benefits, including recreational and aesthetic uses, as well as the hidden costs of current and future uses to ensure comprehensive management of our oceans. We cannot afford to overexploit our ocean and coastal resources and to lose ecosystem services that incur costs to society. These services, such as carbon storage or shoreline protection from wetlands, meet critical needs for humans and should be incorporated into management decisions. For example, in Washington and California, the Puget Sound Partnership and Morro Bay Ecosystem-Based Management Program, respectively, assessed tradeoffs between stakeholders and management strategies by linking ecosystem and human health through an ecosystem services based framework. In Massachusetts, the Ocean Act is structured around ecosystem services balancing the compatibility of current ocean uses and

future needs. We encourage you to learn from these programs as you develop this Strategic Action Plan.

Coastal and Marine Spatial Planning

Effective and transparent communication regarding the use of our ocean and coastal areas is vital to coordinating and initiating coastal and marine spatial planning activities without jeopardizing existing or future marine activities. Federal, State, Territorial, Tribal, regional, and local entities must communicate efficiently with each other and the public as our reliance on ocean resources increases, and the National Ocean Policy must serve to coordinate these efforts. The Strategic Action Plan should provide specific guidance for the Regional Planning Bodies on public and stakeholder participation, including defined expectations, establishment of public advisory committees, and ongoing evaluations of the effectiveness of public and stakeholder engagement.

The Massachusetts Ocean Act, for example, established an Ocean Advisory Commission, consisting of State legislators, agency representatives, and stakeholders, and a Science Advisory Council, coordinating six agency work groups, to acquire and analyze existing data and information regarding habitat; fisheries; transportation, navigation, and infrastructure; sediment; recreation and cultural services; and renewable energy. Using this information, the State of Massachusetts was able to request a refinement of the area considered for offshore wind energy development to take into account certain areas identified as important to the fishing industry. These planning efforts were able to reduce conflict and provide certainty for the development of new off-shore energy technologies and for Massachusetts' iconic and vibrant fishing industry. Furthermore, the ability to coordinate and streamline the permitting process for such projects leads to substantial ecological, social, and economic benefits. Only through an open and transparent process will we be able to effectively address these and other pressing ocean issues, like climate change, ocean acidification, and water quality. Additionally, as the National Ocean Policy implementation process continues, it is imperative that the National Ocean Council and the involved agencies highlight examples of successful coastal and marine spatial planning efforts. There is an abundance of misinformation regarding the intention and purpose of coastal and marine spatial planning, and education is key to accomplishing the end goals.

Inform Decisions and Improve Understanding

Adaptive management requires increasing knowledge to continually improve management decisions to ensure the common goals of healthy and productive oceans alongside vibrant coastal communities. The National Estuarine Research Reserve System, including Padilla Bay, Elkhorn Slough, Narragansett Bay, and Waquoit Bay, provide excellent examples of integrating research and education to help communities develop strategies to address coastal resource issues. Specifically, the Narragansett Bay National Estuarine Research Reserve collaborates with partners to conduct coastal and estuarine research and monitoring throughout the Narragansett Bay and makes this data and related education programs and activities available to Rhode Island schools, colleges, and universities to increase public awareness and understanding of the importance of this estuary.

Similarly, the National Estuary Program takes a collaborative, community-wide approach to protecting and restoring watershed and estuary resources. The Morro Bay National Estuary Program in California has partnered with landowners and conservation groups over a period of seven years to develop site-specific best management practices for their properties. Dedicated community members generate valuable long-term water quality data as part of the volunteer monitoring program and work with program staff and scientists at local universities and agencies to improve our understanding of the complex health of the estuary. The estuary program's education efforts range from field trips and presentations to the development of a free, public-friendly estuary center in Morro Bay. When developing this Strategic Action Plan, we encourage the council to support the development of ocean and environmental education and outreach programs, including citizen science-based research projects. Educating the public on these issues will encourage public participation in the policy decision-making process and will ultimately lead to better policy and more effective implementation.

Coordinate and Support

During these fiscally austere times, it is particularly critical that we reduce duplication and increase efficiency in governmental operations. It is imperative that this effort moves forward from the ground up relying on existing local, regional, Tribal, Territorial, and State programs and entities through a transparent process, which facilitates the direct involvement of stakeholders. Coordinating efforts in permitting processes, as an example, will provide greater clarity for permittees and will reduce time and costs for all stakeholders. The National Ocean Policy must help to coordinate these efforts without adding additional layers of management.

Regional Ecosystem Protection and Restoration

Regional ecosystem protection and restoration should be developed within a comprehensive process for defining, identifying, and evaluating areas of ecological importance. For example, through the Marine Life Protection Act, California is in the process of re-designing the state's system of Marine Protected Areas using information from regional stakeholders in the planning process. Three of the five designated regions have been completed with a process involving the public in a variety of ways including direct communication with regional stakeholder group members, attendance at workshops and public meetings, and providing input on public documents and proposals as they are developed.

Ocean, Coastal, and Great Lakes Observations, Mapping, and Infrastructure

The integration of Federal and non-Federal ocean observing systems, sensors, data collection platforms, data management, and mapping capabilities will provide authoritative, timely, and interoperable data, products, and services to address multiple needs, including for maritime safety, natural hazards mitigation, and environmental protection. This Strategic Action Plan should identify data gaps within these observing systems and additional resources to fill these gaps, expand observations, and outline a system where data is readily accessible to all stakeholders.

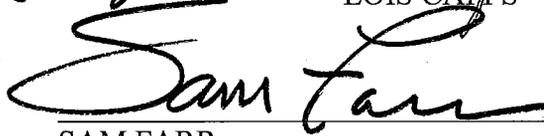
We appreciate the opportunity to comment on these Strategic Action Plans and to share examples from our States, which demonstrate existing and effective actions to help the Nation

achieve these policy objectives and ensure the balanced use of our oceans, coasts, and Great Lakes. We look forward to working with you as this process moves forward.

Sincerely,

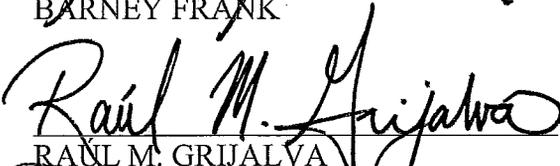

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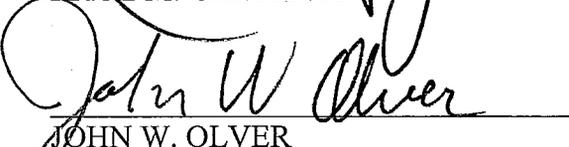

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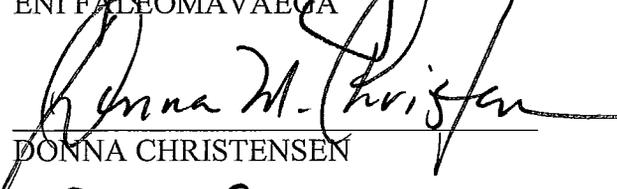

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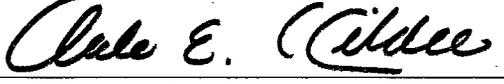

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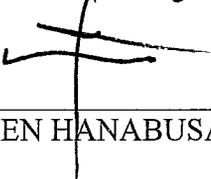

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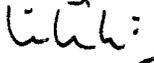

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