

WEST COAST GOVERNORS'
AGREEMENT on **OCEAN HEALTH**
CALIFORNIA OREGON WASHINGTON

July 1, 2011

The Honorable Nancy Sutley
Co-Chair, National Ocean Council
Chair, White House Council on Environmental Quality
Executive Office of the President
722 Jackson Place NW
Washington, DC 20503

The Honorable John Holdren
Co-Chair, National Ocean Council
Director, White House Office of Science and Technology Policy
Executive Office of the President
722 Jackson Place NW
Washington, DC 20503

RE: Comments on the National Ocean Council's Strategic Action Plan outlines

Dear Chairs Sutley and Holdren:

Thank you for the opportunity for the Executive Committee of the West Coast Governors' Agreement on Ocean Health (WCGA) to provide comments on the National Ocean Council's (NOC) nine strategic action plan (SAP) outlines for the National Ocean Policy (NOP) for the Stewardship of the Ocean, Our Coasts, and the Great Lakes. This interim step in the strategic planning process reinforces the efforts to date on the West Coast (2008 WCGA Action Plan) to articulate key regional priorities and objectives that can help advance the National Ocean Policy.

Our West Coast regional ocean partnership was established to protect and manage the shared ocean and coastal resources and the economies they support along the entire West Coast. Our priorities include clean coastal waters and beaches, healthy ocean and coastal habitats, effective ecosystem-based management, reduced impacts of offshore development, increased ocean awareness and literacy among the region's citizens, expanded ocean and coastal scientific information, research, and monitoring, and sustainable economic development of coastal communities. All of these West Coast priorities help advance and achieve NOP priorities.

The WCGA believes it will be critical to the success of NOP implementation to achieve significant actions in the short term to demonstrate the relevance and importance of a national ocean policy to our nation's economy, natural resources, and coastal communities that benefit from healthy coastal and marine environments. Early successes and achievements will help demonstrate the value of these efforts to the US Congress which will be critical to future efforts to fund and sustain them in the long term. Doing so is critical to achieving and implementing

some of the longer term objectives of the NOP, such as the creation of coastal and marine spatial plans in the regions.

The WCGA recognizes the challenges the federal government faces as it attempts to implement a new national ocean policy with limited resources. Our region is poised to leverage resources and collaborate with all entities to achieve NOP objectives with limited resources. However, we also believe it is important for the federal government to clearly articulate its role and commitment to advance each of the nine NOP priorities so that the regions can position themselves to be as efficient and effective as possible.

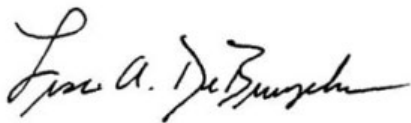
The WCGA would like to offer comments on eight of the SAP outlines. Please find our specific comments on each of these SAP outlines attached and submitted individually via the NOC web site.

Chairs Sutley and Holdren, the WCGA is ready to work with the federal government to finalize the NOP priorities and to implement them. Building upon existing and established state and regional partnerships, such as the WCGA, and ensuring funding to the states and ROPs, will allow the regions to advance their action plans to take the necessary steps toward NOP implementation.

The WCGA appreciates the opportunity to comment on this interim step in the strategic planning process and looks forward to future involvement and participation achieving NOP goals.

I appreciate the opportunity to submit these comments on behalf of the West Coast Governors' Agreement on Ocean Health.

Sincerely,

A handwritten signature in black ink, reading "Lisa A. DeBruyckere". The signature is fluid and cursive, with the first name "Lisa" and last name "DeBruyckere" clearly distinguishable.

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Comments on National Ocean Council draft Strategic Action Plan outlines released June 3, 2011

Objective 1: Ecosystem-Based Management

Ecosystem-based management (EBM) is one of seven key priorities in the 2008 WCGA Action Plan. Implementation of EBM depends upon the ability to share lessons, approaches, and tools; assess the health of coastal and marine ecosystems and establish strong standards and indicators; strengthen regional coordination; and protect species at the base of the food web.

We support the NOC's intention to use EBM as a comprehensive approach to managing coastal and ocean resources as it presents an opportunity to improve, refine, and streamline our national, regional, tribal, and statewide governance regarding the management of shared marine and ocean resources.

Action 1- EBM Leadership and Collaboration

WCGA recommendations:

- **Clearly identify opportunities and barriers to EBM implementation through regional workshops.**
- **Utilize multi-state and regional (in addition to local) partnerships to build on existing EBM networks and facilitate implementation.**

The first action within this objective, EBM Leadership and Collaboration, can be achieved by hosting a series of regional workshops that focus on identification of opportunities and barriers to implementation of an EBM approach to management of specific coastal and ocean resource problems (i.e., coastal urbanization, habitat loss and alteration, non-indigenous species, degraded coastal water quality, fishery stock declines, climate change, etc.). A key milestone that demonstrates achievement of this action is to compile a lessons learned report from existing EBM efforts; this report should be readily available to the public. Under the milestone calling for the compilation and dissemination of information depicting examples of EBM capacity and resources for EBM implementation at all levels, please include multi-state and regional (in addition to local) partnerships to facilitate implementation.

Action 2- EBM Science Framework

WCGA recommendations:

- **Include comprehensive seafloor mapping in the repository of data, support acquisition of this data where it is currently incomplete, and create derived mapping products such as geology and habitat maps.**

- **Collaborate with and support regional efforts to identify of indicators of ecosystem health, particularly those covering social and human dimensions.**

We support NOC's intent to establish a comprehensive repository of data and ask that seafloor mapping data be prioritized as a foundational piece of information. In cases where seafloor maps are incomplete, we encourage prioritization of state waters (0-3nm) as this is the geographic area most impacted by human use. Deriving a suite of mapping products will enhance the usability of this information for management purposes. Furthermore, we encourage the development of Federal-Non Federal commitments to acquire those datasets.

While the science framework is being developed, federal agencies should collaborate with and support regional efforts to identify of indicators of ecosystem health, particularly those covering social and human dimensions. Establishing ecosystem indicators is a need identified by the ocean action plans for the West Coast Governors' Agreement and Washington State. Furthermore, coordinating with states and regions on the development of the science framework for EBM will be important.

Action 4- Incorporate EBM Principles into Policy and Governance

We support the NOC's intent to incorporate EBM into environmental statutory and regulatory regime and project planning and review processes (e.g. National Environmental Policy Act, Endangered Species Act, Coastal Zone Management Act, Magnuson-Stevens Fishery Conservation and Management Act). As a first step, we ask that the NOC identify where EBM principles exist in current law to reduce redundancies and ensure consistency.

Evaluating the Effectiveness of EBM

WCGA recommendations:

- **Develop a metric to evaluate effectiveness of EBM approaches in coastal zone permit decisions.**

Although not an explicit action under this objective, we recommend that the NOC evaluate the effectiveness of EBM efforts. Specifically, we support developing a metric to indicate how specific state/federal coastal zone permit decisions have been improved by incorporation of an EBM approach.

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Objective 2: Coastal and Marine Spatial Planning (CMSP)

The WCGA supports comprehensive planning to protect and manage coastal and ocean resources, and believes CMSP can be a valuable tool to achieve regional and national ocean health priorities. The following objectives within this SAP could be strengthened with these recommendations:

Overview

WCGA recommendations:

- **More clearly articulate that CMSP is a tool that can help achieve NOC goals and consider implementing pilots to demonstrate success**
- **More clearly articulate federal guidelines for developing CMS plans**

Although the NOC states that CMSP is intended to promote societal goals, we recommend that the NOC more clearly articulate that CMSP is tool to achieve other NOC goals, whether it be clean water in which to swim or fish (SAP 7) or healthy ecosystems (SAP 6). We believe that by articulating CMSP in terms of the results achieved, political support for these efforts will increase. Furthermore, initiating pilot projects in a few regions will be a way to demonstrate success while focusing limited resources.

We appreciate the NOC's statements that implementation of CMSP will be flexible and will be driven by the regions. However, we need further articulation from the federal government on what actions will meet the federal guidelines for developing the CMS Plans, such as the criteria for establishing sub-regional plans.

Objective 1: Establish nine RPBs to undertake CMSP and develop by 2020 initial CMS plans for sustainable use and long-term protection of the ocean, coasts, and Great Lakes

WCGA recommendations:

- **Strategically review federal resources and provide additional guidance on and support for the development and operation of Regional Planning Bodies.**
- **Better define the minimum requirements for the sequence, pace and composition of Regional Planning Bodies and their early implementation activities.**
- **Allow for Regional Fishery Management Council (RFMC) representation on the RPBs**

Establishing and managing a Regional Planning Body and CMSP process will require adequate and sustained resources and federal agencies should provide more guidance on their strategy for supporting CMSP. The regional capacity assessments described under section IV should be

encouraged as an early next step perhaps even prior to officially forming the regional planning body.

The Pacific Fishery Management Council (PFMC) plays an important role in regional marine resource management along the West Coast. While we appreciate that the Interagency Ocean Policy Task Force Report states that the RPB will establish a formal mechanism for consultation with the RFMC, the three West Coast states agree that PFMC's participation in the West Coast RPB is very important. We urge the NOC to allow regions to decide whether participation of the RFMCs is appropriate for their region.

Objective 2: By 2015, applicable non-confidential and other non-classified Federal data identified for inclusion will be incorporated into the National Information Management System and Data Portal.

WCGA recommendations:

- **Identify essential types of data (e.g. seafloor mapping) that will help regions assess their own data gaps or needs.**
- **Support regional geospatial data acquisition plans to fill essential data gaps.**
- **Formulate an agreement between federal agencies and regions on the data management methods, standards, and metadata to ensure the best coordination possible between the National Information Management System (NIMS) and regional information systems.**
- **Ensure NIMS datasets include fishery management data from each of the regional fishery management councils.**
- **Support regional data portal development by incorporating federal datasets into these systems in the near-term and improve communication with regions.**

The creation of a National Information Management System (NIMS) with nested regional information management systems is an important element in the CMSP SAP. We hope that by providing guidance to the regions about essential data types (e.g., seafloor habitat maps, human use maps) and data standards, this will help regions identify data gaps, prioritize data acquisition, ensure consistency between regions in the types of data considered during the planning process, and facilitate the interoperability of regional and national information systems. Furthermore, we hope that regional data portal development will be advanced simultaneously with NIMS as we need federal agencies to engage in regional efforts.

Objective 3: Preserve and enhance opportunities for sustainable and beneficial ocean use through the promotion of regulatory efficiency, consistency, and transparency as well as improved coordination across Federal agencies.

WCGA recommendations:

- **Incorporate CMSP goals and objectives into federal programs through a “unifying” federal statute.**

Incorporating CMSP goals and objectives into the statutory authorities of participating federal agencies through a unifying “act” (such as the Coastal Zone Management Act or Outer Continental Shelf Lands Act) will provide a formal structure for CMSP implementation and ensure federal consistency with state CMS plans.

IV. Regional Implementation, Actions and Milestones, and Work Products

WCGA recommendations:

- **Provide a mechanism for inclusion of local governments in stakeholder and public engagement and participation.**
- **Develop indicators of environmental and socio-economic conditions so that geospatial data can be interpreted by decision-makers, managers and the public.**
- **Support technical training for federal, state, tribal, and local governments to interpret spatial data.**
- **Describe the monitoring and evaluation processes for CMSP.**

We thank the NOC for acknowledging the importance of stakeholder and public engagement and participation under section IV. Although many stakeholder groups are mentioned, we recommend more clearly articulating the importance of local government participation.

Under “Consultation with Scientists and Technical and Other Experts”, we recommend that the NOC work with these group to develop indicators that describe environmental and socio-economic conditions. These indicators help provide context to the geospatial data about the status and trends of environmental and socio-economic conditions that will help decision-makers, managers, and the public interpret often complex data.

Under “Implementation of CMS Plans” we recommend that the NOC support technical training for federal, state, tribal, and local governments to increase their knowledge of the tools available and increase the technical proficiency in managing and analyzing spatial data.

We recommend that a description of monitoring and evaluation processes be added as a bullet under section IV. These processes should consider questions such as whether CMSP has resulted

in increased efficacy in planning/regulating, decreased user conflicts, and greater consideration of cumulative impacts on the environment.

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Objective 3: Inform decisions and improve understanding

We agree that expanding research, improving understanding, and increasing awareness of coastal resources is critical to the National Ocean Policy. Priorities 5 and 6 in the 2008 WCGA Action Plan, “Ocean Awareness and Literacy Among Citizens” and “Expand Ocean and Coastal Scientific Information” align with this NOP objective. We would like to specifically comment on and identify gaps in Actions 2, 3, 5 and 7.

Action 2 – Science to support emerging sustainable uses

WCGA Recommendations:

- **In the near term, evaluate current federal investments in scientific research on emerging sustainable uses such as renewable energy and seek to improve coordination and reduce duplication.**

Already federal agencies are providing significant funding to explore scientific questions around sustainable uses such as renewable energy. However, these investments need better coordination to prioritize funding toward important questions, reduce redundancy between projects, and improve access to results for managers, stakeholders, and the public.

Action 3 - Provide science support for managers and policy makers

WCGA Recommendations:

- **Distribute both existing and new scientific information to managers and improving communication about our oceans among scientists, managers, stakeholders, and the public**

This is not just about training or decision-support tools, managers often simply don’t have access to scientific information. In addition, economic, social, and cultural scientific information is often sparse and is in need of particular emphasis. We agree that conducting a needs assessment for decision makers at all levels will be necessary to effectively provide science support to managers and policy makers. We advocate that a series of white papers and briefing statements on key priority ocean issues be developed and disseminated to decision makers and legislative staff at the state and federal levels. Topics of the white papers and briefing statements should be based on gaps identified through the needs assessment.

Action 5 - Increase Ocean Literacy

WCGA Recommendations:

- **Establish a task force to create a national plan to improve ocean literacy**
- **Clearly integrate ocean literacy into Science Technology Engineering and Mathematics (STEM) education guidelines**
- **Increase and secure federal funding for ocean education and research. As part of this effort, evaluate past and current federal investments in ocean literacy. Resume and maintain funding for effective programs with on-the-ground results.**
- **Create and disseminate curricula and other resources to promote ocean literacy**
- **Employ social marketing to promote ocean and coastal stewardship**

We advocate for the formation of a task force comprised of representatives from the federal and state governments, universities, Centers for Ocean Sciences Education Excellence (COSEE), regional governance groups and K-12 educators and administrators to create a clear national plan to improve ocean literacy that will: determine areas of need for formal and informal ocean education, establish a baseline of public knowledge, and identify how the federal government can support state efforts. We should also promote ocean literacy via STEM education by identifying subject areas and instructional modalities that could be addressed using ocean education content. We also think that the NOC should create secure funding for and expand existing ocean education and outreach programs (e.g. NOAA's B-WET program funding should be secured and this program should be expanded to additional areas). Social marketing research should be employed to develop a framework for a nation-wide campaign to promote ocean and coastal stewardship (e.g. California's Thank You Ocean Campaign). We believe that addition of these specific recommendations will help achieve the goal of increasing ocean literacy and the listed outcomes.

Action 7 – Integrate social and natural scientific information**WCGA Recommendations:**

- **Identify some near-term, concrete activities to advance the integration of social sciences such as development of social and economic indicators in consultation with states, regions, and tribes.**

Employ a pilot project to advance the development of human and social indicators of ecosystem health, which is identified as a need for the West Coast region. We need better information on social, cultural, and economic values of ocean and coastal resources, including indicators of healthy coastal communities. Over the mid-term, the federal agencies should assess their capacity in this arena and should consult with local, state, tribal and regional efforts.

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Objective 4: Coordinate and Support

Action 1- Develop a regional communication framework under the National Oceanographic Partnership Program

WCGA recommendations:

- **Provide for a full-time federal position to coordinate federal agencies, ROG partnerships, tribal governments and other entities.**

We thank the NOC for recognizing the need for the various Regional Ocean Governance (ROG) partnerships to coordinate with one another and with the federal government. However, the development of a website, as suggested in this action, will have only limited utility to the WCGA. Staff time is the primary constraint in the ROGs working with each other and other groups. The WCGA has been very fortunate to have federal grant money to support a nearly full-time coordinator; however, these funds are limited to a 2-year period. Rather than create a website, we recommend that the NOC reallocate those resources to support a full-time federal position tasked with coordinating the ROGs, federal government, tribal governments, and other entities.

Action 5- Identify specific ways to prioritize and coordinate resources, reduce spending overlap, and leverage funding between and among Federal agencies, Tribes, and ROGs.

WCGA recommendations:

- **Coordinate across federal agencies and with OMB for *new* funding to implement the NOP.**

The adequate and sustained funding of the NOP, and CMSP in particular, has been one of the greatest concerns of the WCGA. We appreciate the recognition by the NOC that federal resources must be prioritized, overlaps in spending reduced, and that funding should be leveraged. We particularly appreciate the statement that the NOC will “produce a budget in coordination with the Office of Management and Budget (OMB) that identifies existing funding sources within the Federal budget that support the nine priority objectives.” However, the WCGA notes that in order to fulfill the mandate of the NOP, identification of existing funding sources is not enough. New funding must be allocated to federal agencies, states, and tribes, and additional funding is necessary to realize the use of CMSP as a tool to advance national ocean and coastal health priorities. We encourage the NOC to coordinate with OMB and Congress to find new sources of funding.

Involvement with Tribes

WCGA recommendations:

- **Help initiate coordination between states and regions with tribes and tribal communities**

Tribes and tribal communities are rightly called out in the NOP for their special and unique role in ocean and coastal management. Although the states have continued to improve engagement and communication with tribes and tribal communities on the West Coast, the federal government will need to assist states or regions in efforts to involve and coordinate with the tribes. It will be important for the federal government to initiate this coordination with tribal nations on a government-to-government basis.

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Objective 5: Resiliency and Adaptation to Climate Change and Ocean Acidification

Preparing for the effects of climate change is a key action in the 2008 WCGA Action Plan. Assessing West Coast shoreline changes and anticipated impacts to coastal areas and communities due to climate change over the next several decades, and developing actions to mitigate and adapt to the impacts of climate change and related coastal hazards are integral to ensuring the health and economic well-being of coastal communities. In 2010, the WCGA sponsored a West Coast sea level rise study by the National Research Council of the National Academies of Science, and the three governors and the premier of British Columbia signed an Action Plan for Ocean Conservation and Climate Change Adaptation of the Pacific Coast Collaborative.

Because there is relatively little research on ocean acidification versus climate change, we recommend the NOC consider separating ocean acidification from climate change issues, building off of existing national strategies to improve research on ocean acidification, and emphasizing that vulnerability assessments MUST be the first step before communities can take action. In addition, a key gap that exists is the need to develop feasible alternative scenarios for the future operations, maintenance, and relocation of built infrastructure (e.g., coastal roads, port facilities, dam operation) to mitigate the effects of climate change on ecosystems.

Overview

WCGA recommendations:

- **Develop actions to improve outreach and education on climate change and ocean acidification.**

Public outreach and education is critical to the successful completion of the actions listed in this SAP outline. This outreach should focus on planning for risks such as sea level rise, storm surges and increased wave heights/coastal flooding. The WCGA urges the NOC to develop communication resources and tools focused on coastal adaptation that resonate with stakeholders. In addition, sharing the results of collaborative climate research with the public is an important step in raising awareness of climate change and ocean acidification as emerging threats.

Action 1 – Improve understanding of the impacts of climate change and ocean acidification

WCGA recommendations:

- **Increase monitoring of ocean acidification, ocean pH, and climate impacts for species and habitat, including effects on fisheries and shellfish industries.**
- **Include estuaries and estuarine species in all federally initiated research on climate change.**
- **Develop opportunities, particularly for federal funding opportunities, that encourage collaboration among multi-sector key partners to advance research.**
- **Incorporate data from regional and local expertise into the data portal being established by the federal government.**

We appreciate the NOC's commitment to conduct strategic research on the response of key species to multiple stressors (e.g., pH) but want to emphasize the need for increased and sustained monitoring of these impacts, particularly their effect on fisheries and shellfish industries, essential fish habitat, hatcheries, and food webs. We recommend that estuaries and estuarine species be included in any federally initiated climate research, as estuaries may face different and equally significant impacts in ocean acidification that may differ from those seen in the open ocean. Collaboration among multi-sector partners (ie., regional, state, federal, tribal, private) will be particularly important in ensuring the most cost-effective and relevant research on climate change. Regarding the fifth bullet under "Why do this" for Action 2, we recommend the NOC acknowledge regional and local groups that are assembling climate change science.

Action 3 – Strengthen and integrate observations...

WCGA recommendations:

- **Include research on climate change impacts to shorelines in the proposed coordinated framework of "sentinel sites and systems."**

Identification of key baseline data is needed by both coastal planners and managers planning for sea level rise, coastal erosion, and severe storms. This integration of observations should include monitoring of shorelines where impacts of sea-level rise and climate change may occur.

Action 4 - Provide accessible, timely, and relevant climate change and ocean acidification information, tools, guidance, and services to support decision making at all scales

WCGA recommendations:

- **Work with state, local, and tribal governments to provide coastal planners in each region with one comprehensive resource to plan for climate change adaptation and sea level rise in the form of a ‘guidebook’.**
- **Catalogue emerging and state-of-the-art adaptation strategies, both engineering and ecosystem-based approaches.**
- **Integrate information on the potential impacts to infrastructure into the proposed clearinghouse/portal**
- **Develop forums for knowledge sharing to effectively implement climate change adaptation.**

We thank the NOC for committing to the development of an interagency plan for LiDAR mapping. This information is critical to assessing and adapting to sea-level rise. The WCGA is currently working on the development of a “guidebook” to help inform decision makers and planners on a regional level. The NOC should engage in this process and provide support and information that is relevant both regionally and nationally. As science quickly develops on climate change, the WCGA urges the NOC to make real-time research on adaptation strategies available and accessible through a clearinghouse or data portal. Regarding bullet 5 under milestones, the WCGA recommends integrating information on the potential impacts to infrastructure into the proposed interagency climate clearinghouse/portal. This would help support economic analysis of structural and non-structural response options. Regarding bullet 6 under milestones, the WCGA commends the NOC for acknowledging the need for a “community of practice,” and would recommend inclusion of experts from local, state, regional, tribal, and NGO communities.

Action 5 - Assess vulnerability of the built and natural environments and their interactions in a changing climate

WCGA recommendations:

- **Assess how other environmental stressors (e.g., hypoxia) may interact or exacerbate climate change impacts on the environment.**

The impacts of climate change may be magnified by other climate phenomenon such as hypoxia events. Regardless of the probability of occurrence, the WCGA recommends these synergistic effects of climate change be considered in vulnerability assessments and in the development of adaptation strategies.

Actions 6 – Design, implement and evaluate adaptation strategies in order to reduce vulnerabilities and promote risk-wise decisions

WCGA recommendations:

- **Support interagency coordination on climate change research and management in order to improve efficiency, innovation and flexibility.**
- **Provide funding for increased capacity of local governments and for the most urgently needed capital infrastructure alterations and/or habitat restoration.**
- **Encourage fisheries management to consider and adapt to climate change impacts.**
- **Include local and state representation in the proposed regional frameworks for coordinated adaptation, implementation, and evaluation across geographic scales and organizations.**

We thank the NOC for recognizing the various strategies for adaptation, particularly strategies for managed retreat listed under the milestones. Many local jurisdictions lack the necessary expertise, infrastructure, and funds to prepare for climate change. We urge the NOC to provide funding for increased capacity of local governments to plan for climate change impacts and provide funding for the most urgently need capital infrastructure alterations and/or habitat restoration. We request that the NOC encourage fishery managers to identify and evaluate management options to adapt to climate change, such as seeding and harvesting shellfish at different times and locations based on water conditions. Regarding bullet 5 under milestones, the WCGA supports the proposed regional frameworks as long as local and state participation is allowed.

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Objective 6: Regional Ecosystem Protection and Restoration

We appreciate that the NOC's recognizes the importance of ecosystem protection and restoration, as it is a key priority in the 2008 WCGA Action Plan. We have a process recommendation to fall under the context and continuity section as well as specific comments for Actions 1, 2, and 6.

Context and Continuity

WCGA Recommendations:

- **Create common and standardized classifications for marine and coastal habitats.**

We appreciate and support the NOC's effort to address project prioritization, collaboration and coordination, science-based planning, impacts of invasive species, and protection, maintenance, and restoration of populations and essential habitats. However, we feel that this process will greatly benefit from gauging state-by-state progress towards a common and standardized classification scheme for marine and coastal habitat and further develop and refine region-wide metrics for the evaluation of marine, estuarine, and coastal habitat conditions (e.g. National Coastal Condition Report, National Eutrophication Report, National Wetlands Inventory, EMAP/CEMPA etc). Integration of these separate efforts with a unified numerical assessment of the ecological condition of coastal and marine habitats combined with standard classification for habitats will improve and streamline collaboration across states and regions.

Action 1 – Shared regional ecosystem protection and restoration priorities

WCGA Recommendations:

- **Support West Coast restoration efforts.**

Many West Coast restoration projects depend on significant federal funding to accomplish their goals including two particularly large restoration projects. In Washington, Puget Sound a major ecosystem protection and restoration effort in the country and deserves continued federal support and engagement. In California, the South Bay Salt Pond Restoration Project is the largest tidal wetland project on the West Coast, and will require federal funding for completion. This will contribute to meeting the national goals for restoration and protection in the near and mid-term.

Action 2 – Conservation Partnerships

WCGA Recommendations:

- **Examine ways to strengthen other partnerships that will identify and conserve non-wetland ocean and coastal habitats.**

While wetlands are important habitats, this action focuses too heavily on supporting and utilizing the Corporate Wetland Restoration Project. Other groups and partnerships may be better suited toward other types of habitat conservation necessary for our coasts and oceans.

Action 6 – Reduce the threat of aquatic invasive species

WCGA Recommendations:

- **Focus on preventing the introduction of aquatic invasive species**
- **Increase capacity of the Aquatic Nuisance Species Task Force (ANSTF) and encourage partnerships with state and local governments.**
- **Support control or eradication of priority aquatic nuisance species identified in each region.**

While we appreciate the focus on reducing the threat of aquatic invasive species, it is always more costly to control or eradicate a species than to prevent its introduction in the first place. We encourage the NOC to consider efforts to prevent the introduction of aquatic invasive species, such as by supporting ballast water treatment and addressing hull fouling and the trade of live organisms as largely unmanaged vectors.

We support the NOC's recommendation that the Aquatic Nuisance Species Task Force (ANSTF) fulfill a coordinating role amongst federal agencies in implementing fragmented policies for regulating invasive species. While we believe the ANSTF is probably the entity best positioned to take on this role, we are concerned that they do not currently have adequate capacity, particularly if the ANSTF relies upon their regional panels, largely composed of volunteers, to do this work. Our experience has shown that the Western Regional Panel of the ANSTF has focused largely on zebra and quagga mussels, and due to limited capacity, has not been able to address coastal and marine species. We furthermore suggest that the ANSTF reach out to state and local partners to a greater extent.

We recognize that the NOC has cited the Indo-Pacific lionfish in the Caribbean could serve as a model to increase our understanding of how to manage other invasive species throughout the nation. However, the milestones and outcomes of this action list only processes and control plans for lionfish. Equal weight and support need to be given to the priority aquatic nuisance species that are identified by federal and non-federal partners in each region.

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Objective 7: Water Quality and Sustainable Practices on Land

We thank the NOC for thoroughly covering the complexity of ensuring clean water quality through the many goals, milestones, and outcomes listed in this SAP. Coastal water quality programs that reduce polluted runoff, enhance monitoring and enforcement of water quality regulations, combat nonpoint source pollution, better predict harmful algal blooms and hypoxia, reduce marine debris, provide for adequate oil spill prevention, preparedness and response, and set stringent emission standards for oceangoing vessels are key objectives in the 2008 WCGA Action Plan.

Overview

WCGA recommendations:

- **Identify and publish grants, funding and subsidies to incentivize coastal communities, both rural and urban, to plan and implement green infrastructure (GI) and low impact development (LID)**
- **Re-asses nationwide water quality standards to align with the outcomes of GI and LID**

In addition to the recommendations specific to a particular Action further below, the WCGA would like to recommend that the USEPA, working closely with the states, (1) identify and publish grants, funding, subsidies and other incentives available to coastal communities for planning and implementation of green infrastructure (GI) and low impact development (LID) and (2) re-asses nationwide water quality standards (specifically objectives, criteria and metrics) related to the expected outcomes of GI and LID - e.g., reduced hydromodification impacts, increased biological health, etc.

Action 1-Reduce rural sources of excessive nutrients and sediments

WCGA recommendations:

- **Ensure accountability and reductions from rural sources of polluted runoff similar to industrial sources to reduce impacts**

For agricultural runoff sources measures of accountability and reductions for their impacts similar to industrial pollution sources should be considered and enforced using existing authorities.

Action 2-Reduce urban sources of excessive nutrients and sediments

WCGA recommendations:

- **Compile and communicate case studies and best management practices to demonstrate successful integration of land and aquatic planning**
- **Provide incentives and funding to local communities for implementation of GI and LID**
- **Streamline and refine permitting, regulation, and interagency coordination to improve navigation of the permitting process and ensure development is consistent with GI and LID**

The WCGA would like to ensure that areas in need of technical assistance have access to the information such as case studies and best management practices that demonstrate the successes of integrating land and aquatic planning. Similarly, incentives and funding should encourage communities to implement integrated planning for storm and wastewater treatment, mass transit systems, green infrastructure (GI), low impact development (LID), and protection or restoration of habitat. Additionally, we need to identify opportunities for streamlining permitting and refining complex regulatory pathways, aligning GI and LID requirements in permits to follow the prioritized principle of “avoidance, minimization, and mitigation”, and increasing interagency coordination and permitting processing.

Action 3 - Assess hypoxia status, trends, and impacts nationwide.

WCGA recommendations:

- **Ensure adequate monitoring and research for all hypoxic areas, including those not associated with nutrient enrichment from land.**

The West Coast (off of Oregon and Washington) has had repeated seasonal hypoxic events that may be related to climate changes. Unlike many areas, nutrient enrichment from land is not likely a factor, but resource managers and stakeholders still need improved information on the extent, causes and forecasting for hypoxic events for the West Coast. In particular, this requires more robust monitoring for this vicinity.

Action 4-Reduce trash and marine debris through pollution prevention and removal

WCGA recommendations:

- **Focus on marine debris pollution in the “near-term” rather than “long-term” timeframe**
- **Prioritize derelict gear removal efforts along with land-based marine debris**
- **Work with states, tribes, and stakeholders to create a marine debris strategy with target reductions over time and a long-term zero discharge goal based, in part, on local feedback from regional workshops that we recommend the federal government sponsor**

- **Establish regional alliances to implement the region’s marine debris strategy**

Marine debris prevention and removal should be “near-term” rather than “long-term” as a federal priority. This issue could be a successful national effort capitalizing on the current momentum and existing framework within regions. Action 4 addresses land-based debris and should also prioritize derelict gear removal efforts that impact key habitat areas and where there are known entanglement issues.

To strengthen partnerships in affected communities among local, state, and regional levels, the WCGA recommends hosting a series of regional workshops that bring together key players in prevention, reduction, and removal to assess existing issues and efforts. Such workshops can provide the foundation for establishing and supporting a marine debris strategy to provide a clear implementation plan that includes direct actions for measurable target reductions and a long-term goal of zero trash discharge, timelines, available and needed resources, ways to leverage resources for priority projects, and tools such as Extended Producer Responsibility (EPR), bans, fees, alternatives, and expanding waste and recycling collection at waterways, including sewage, gray water and bilge water from boats.

To monitor implementation of the strategy, regional alliances such as the proposed West Coast Marine Debris Alliance can be established with membership composed of state, federal, local, and tribal governments, NGOs, and industry representatives. The alliance should identify appropriate state contacts and authorities, exchange information and lessons learned to maximize cooperation and identify best use of resources for addressing marine debris issues.

Action 5-Assess health risks of coastal waters

WCGA recommendations:

- **Identify areas most vulnerable to health risks that may require assistance to cope with significant water quality threats**

Efficiently utilizing our finite resources to maximize protection of the public from health risks will require that we identify priority areas in need of assistance and provide the resources (financial and technical expertise) to these key areas so they can build their capacity and decrease their vulnerability to significant water quality threats.

Action 7-Identify and protect high quality coastal waters

WCGA recommendations:

- **Continue to improve federal coordination on prevention, preparedness, and response to coastal and offshore oil/chemical pollution from spills and industrial/shipping operations**
- **Use case studies, best management practices, and mapping products to educate stakeholders about the importance of sustainable land use practices and policies**

Looking back on the devastating impacts of the *Cosco Busan* spill in San Francisco Bay or the Deep Horizon oil spill in the Gulf of Mexico last spring, we commend the NOC for its goal of improving federal coordination on prevention, preparedness, and response to coastal and offshore oil/chemical pollution from spills and industrial/shipping operations and want to emphasize the importance of this outcome for protection of the high quality offshore and coastal waters of the West Coast.

Highly functioning areas can be used to educate and incentivize stakeholders to take more proactive steps in protecting coastal waters by sharing best practices and diverse strategies for watershed approaches to management, regulatory approaches to define sustainable development practices, and incentives for sustainable land use development using GIS and other products to map protection and restoration efforts, as well as land use policy changes and their impacts.

July 1, 2011

Comments on National Ocean Council draft Strategic Action Plan outlines released June 3, 2011

Objective 9: Ocean, Coastal, and Great Lakes observations, mapping, and infrastructure

Priority Area 6 in the 2008 WCGA Action Plan, Expand Ocean and Coastal Scientific Information, Research, and Monitoring, emphasizes the development of a regional research agenda, supporting long-term maintenance of ocean observing systems and monitoring assets on the West Coast, and completing a seafloor map of the bathymetry, benthic substrate, relief, geology, and habitats of all state tidelands and submerged lands out to three miles.

Action 4-Implement the Integrated Ocean Observation System (IOOS)

WCGA recommendations:

- **Adequately fund the operation and maintenance of Integrated Ocean Observation System (IOOS)**
- **Add milestones related to IOOS data dissemination and use by managers and stakeholders**

The West Coast is heavily invested in ocean observations, monitoring, and mapping efforts within state waters. We have established comprehensive ocean observation systems (NANOOS, CeNCOOS, and SCCOOS) for the entire coast as part of the US Integrated Ocean Observing System (IOOS) in partnership with federal agencies and academic institutions utilizing various technologies such as high-frequency radar. With adequate support, ocean observing systems can continue to deliver state and national benefits and further improve conversion and integration of data into information to support management. For example to support CMSP, the IOOS system could work with regional planning bodies and regional ocean partnerships to produce mapping products derived from ocean observation data for spill response, search and rescue, and water quality management.

Taking on new projects should not come at the expense of such an important initiative as our Integrated Ocean Observing System which underpins the other 8 objectives of the NOP and can be used to make our efforts more streamlined, cost-effective and efficient. As recognized in the plan, moving forward, federal funding will be crucial to continuously improve and maintain this system and infrastructure.

Action 5-Coordinate and leverage ocean and coastal mapping efforts

WCGA recommendations:

- **Engage in a joint federal and non-federal commitment for comprehensive seafloor and habitat mapping of state waters (short-term) and federal waters from shore to 12 nautical miles offshore (long-term).**

To better coordinate mapping efforts, the WCGA envisions plans for a joint federal-non federal commitment for comprehensive seafloor and habitat mapping of state waters from shore to 3 nautical miles (nm) (short-term) and federal waters from 3nm-12nm (mid-term) to achieve the longer term goal of mapping waters from shore to 12nm. And, eventually, we could map out to the upper limit of Exclusive Economic Zone. This joint commitment in this boundary zone between state and federal jurisdictions will improve communication and coordination across all levels of government.

Action 6-Develop an integrated observation data management system

WCGA recommendations:

- **Improve public access to data and information, transparency, and availability of useful data products.**

The WCGA agrees that the information gathered through all the observation and monitoring systems mentioned provides the foundation for our decisions and that understanding and communicating this vast amount of information is equally important. The proposed data system will provide valuable information to ultimately lead to the desired outcome of improved public access to data and information, transparency, and availability of usable, comprehensible seafloor and habitat mapping products.