

From: [Mary Small](#)
To: ["Briana Moseley"; "Clare O'Reilly"](#)
Cc: ["Amber Mace, Executive Director"; "Maira McEnespy"](#)
Subject: FW: Comments/Suggestions re OPC Strategic Action Plan, Ocean Acidification and Land-Sea Interaction Focal Areas
Date: Friday, September 09, 2011 2:31:45 PM
Attachments: [C.40.Inf.14 Marine Debris.pdf](#)
[imdccreport.pdf](#)

FYI

From: Meg Caldwell [mailto:megc@law.stanford.edu]
Sent: Friday, September 09, 2011 11:04 AM
To: Amber Mace; msmall@scc.ca.gov; vtermini@scc.ca.gov; Abe Doherty; Skyli McAfee
Cc: melissa foley; Ryan P. Kelly
Subject: Comments/Suggestions re OPC Strategic Action Plan, Ocean Acidification and Land-Sea Interaction Focal Areas

Amber, Mary, Abe, Valerie, and Skyli,
Thank you so much for a great discussion last week. As promised, here are our thoughts regarding addressing OA in the OPC Strategic Plan. I'll be out of the country for the next two weeks, but will be checking email occasionally. In my absence, please don't hesitate to contact Melissa Foley or Ryan Kelly from our "shop" to run any questions or ideas past them.
best, Meg

Issue 2: Ecosystem Impacts of Climate Change (pg.19)

The second paragraph of the introductory section should be amended to include local drivers. Something like, "...due to greenhouse gases released into the atmosphere. *In addition, there are numerous local drivers of ocean acidification--including fertilizer runoff and erosion--that can be managed at local, regional, and state scales.*" (text between the *s is my addition).

In the next paragraph, the last sentence could be amended to read, "The OPC will focus on actions to improve understanding of *the drivers of local acidification hotspots and* the potential impacts from ocean acidification, and to identify initial..."

Issue 7: Marine Debris (pg. 30)

The third sentence could include the economic impact of debris on ecosystem services and on tourism. See attached NOAA report at p25-26, and UN GEF Report at p.10-11. This would underscore both the seriousness of the problem and the economic logic for addressing it.

Second paragraph, third sentence: awkward wording ("made...accomplishments").

Objective 7.1 (p. 31): Rather than action item 7.1.1 be reconvening and expanding the Steering Committee, it would make sense to emphasize the impact of this Committee's actions. Again, given the overall thrust of the document (maximizing impact while minimizing budget), action item 7.1.1 could highlight the economic advantages of minimizing waste that results in marine debris.

Objective 7.2:

Action Item 7.2.1: incorporate references to known economic impacts, and highlight need for California-specific assessment.

Action Item 7.2.2: identify particular needs animating the "new studies on marine debris."

Objective 7.3: Perhaps mention some "key industries" to make the metrics of effectiveness more concrete -- cigarette butts? Plastic bags?

Issue 8: Sediment Management

The introductory paragraphs on p.32 should include references to the detrimental effects of increased runoff from impermeable surfaces and increased erosion, both of which can result from land-use changes.

Objective 8.1, Action 8.1.2: perhaps the Action Item should be worded "Encourage implementation of pilot projects that TEST [rather than demonstrate] the efficacy of alternative regulatory standards." (If the efficacy is already known, disregard.)

Objective 8.2: Perhaps this could include developing best practices along with the data/tools mentioned here.

I think it is worth considering adding an Objective 8.4: "Increase awareness of harmful land-sea interactions stemming from terrestrial land-use change, and encouraging enforcement to mitigate these impacts."

In particular, the CEQA guidelines prompt the applicant to assess whether a project would "Result in substantial soil erosion or the loss of topsoil?" (VI(b)) or "Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?" (IX(c)), or "Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?" (IX(e)).

Highlighting existing law/guidance in this way could give OPC another policy lever through which to protect the ocean from harmful land/sea interaction, without requiring an additional revenue source.

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Check out our new Decision Guide: Selecting Decision Support Tools for Marine Spatial Planning at http://www.centerforoceansolutions.org/sites/default/files/cos_msp_guide_6.pdf

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