



ORANGE COUNTY
COASTKEEPER®

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September 12, 2011

The Honorable John Laird, Secretary for Natural Resources
Chair, California Ocean Protection Council
California Natural Resources Agency
1416 Ninth Street, Suite 1311
Sacramento, CA 95814

VIA ELECTRONIC MAIL: opc.comments@oc.ca.gov

Re: Comments on Ocean Protection Council Draft Strategic Action Plan (August 1, 2011)

Dear Chair Laird and Ocean Protection Council Members:

Orange County Coastkeeper (Coastkeeper) is a grass roots environmental organization with the mission to preserve, protect and restore the watersheds and coastal environment of Orange County. We welcome the opportunity to submit these comments on Ocean Protection Council's 2012-17 Draft Strategic Action Plan (Plan). The Plan act to provide critical guidance to state agencies as they work to create and/or implement important environmental regulations impacting coastal and marine resources for generations.

Coastkeeper seeks to supplement the broader California Coastkeeper Alliance letter addressed to the Ocean Protection Council (OPC) by detailing some suggestions specific to Orange County and southern California in general. California's diverse coastal environment demand some regionalization towards specific ocean and coastal priorities and this letter attempts to provide guidance on how the OPC could positively impact southern California's delicate marine and coastal ecosystems.

We agree and are encouraged by the draft Strategic Action Plan's assertion that the OPC will "continue to take a leadership role and utilize the OPC's core competencies and unique function in state government" to the benefit of the coastal and marine environment. In addition to the aforementioned California Coastkeeper Alliance letter, Coastkeeper submits these limited recommendations to strengthen and clarify sections.

A. SUSTAINABLE FISHERIES AND MARINE ECOSYSTEM FOCAL AREA

The OPC is perhaps the best positioned state agency in California to strategically and comprehensively research and remedy the issues surrounding sustainable fisheries and the restoration of historic fisheries. It is the later of these two opportunities that is glaringly absent in Section B of the Plan.

Southern California has historically been home to a vibrant commercial and recreational fishing community generating a significant economic contribution to the local economy and essential locally-sourced and healthy proteins onto the plates of Californians statewide. Unfortunately, many southern California fisheries have been closed due to chronic overfishing combined with impaired natural conditions causing a deterioration in the sustainable numbers of an otherwise commercially valuable and vitally important local species.

For example, Coastkeeper is early in the process of a southern California Green Abalone Restoration Project at various sites between Palos Verdes to Dana Point. At one time, abalone was a ubiquitous site at restaurants and barbeques along the entire coast of southern California. Due to unsustainable fishing and naturally occurring illness,

an accurate calculation of the abalone population in southern California is unknown and the prospect for natural recovery is uncertain.

As the body charged with providing leadership and coordinating the activities of state agencies to improve the effectiveness of state efforts to protect ocean and coastal resources, including support for California's new Marine Protected Areas, the OPC should provide the leadership necessary to include the restoration of historic fisheries utilizing MPAs as an objective in the Plan. The restoration of historic fisheries, such as abalone fisheries, will begin the rebalancing of an anthropogenically modified ecosystem while providing a long term sustainable fishery. Bold leadership by expanding the goals of both MPAs and sustainable fisheries in this Plan could significantly improve an ecosystem, fishermen, and consumers for current and future generations.

B. MARINE DEBRIS

Coastkeeper has long been an advocate for a comprehensive marine debris program that seeks a robust education, prevention, reporting, and recovery effort in order to improve marine public safety and the natural ecosystem. In so doing, Coastkeeper strongly encourages the expansion of the marine debris steering committee and the OPC supporting the State Water Resources Control Board's adoption and imposition of a statewide trash policy. The problem of marine debris is caused by commercial and recreational fishing and Coastkeeper has faith that with proper incentives and regulations those commercial and recreational fishermen will be part of the solution.

C. INDUSTRIAL USES

California's policy on desalination and once-through cooling is the most significant coastal or marine issue for the next five years and will impact the direction of the state's environmental legacy for decades. The adoption of a comprehensive scientifically-based policy on the actual impacts of once-through cooling, a World War II era technological solution to a problem with existing cost effective twenty first century solutions, and the application of that antiquated technology to a nascent and yet-unproven large scale seawater desalination industry will be the most significant policy decision the OPC will make during the Brown administration.

Coastkeeper strongly supports the OPC's existing once-through cooling policy for the reasons detailed in our joint California Coastkeeper Alliance letter on the subject and encourage the OPC to adapt that policy generally towards harmful open-ocean intakes. The burden to modify the language proposed in earlier drafts of the Plan by the OPC must be on the proponents of the modification. In this case, the rationale for the modification is as unpersuasive today as it was when the staff rejected their position and first proposed the earlier draft language. If staff decides to edit the current language prohibiting open-ocean intakes in the Plan, then we reiterate our position that the metric be modified as follows: *Take immediate and appropriate action to formalize OPC's position regarding open-ocean intakes to be consistent with the law, and the goal of the OPC Resolution on Once Through Cooling, to protect marine ecosystems from the adverse impacts of entrainment and impingement.*

Thank you for your consideration of our comments. If you have any questions or concerns, please do not hesitate to contact us directly at (714) 850-1965.

Sincerely,



Garry Brown
Executive Director
Orange County Coastkeeper