



October 7, 2016

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

**RE: Action Item 4, Funding for Proposed Proposition 84 Projects**

Dear Secretary Laird and members of the Ocean Protection Council:

I am writing on behalf of NRDC in strong support of the Ocean Protection Council's (OPC) proposed use of Proposition 84 funds for a suite of projects that will advance the State's mandate to safeguard California's marine environment. NRDC enthusiastically supports OPC's use of Prop 84 funds to promote the health of California's ocean and marine biodiversity. In particular, NRDC would like to highlight the proposed Ocean Acidification and Hypoxia (OAH), Marine Protected Area (MPA), and Marine Debris projects as being of special interest to the organization.

If left unchecked and unmanaged, ocean acidification will profoundly impact marine species and ecosystems and the humans that depend on them. The six proposed OAH projects are an essential next step to implement the West Coast Ocean Acidification and Hypoxia Science Panel's (Panel) recommendations and will begin to provide the science needed to inform California's emerging OAH policies. On the West Coast, the shellfish aquaculture industry is already experiencing the impacts of OAH. As noted in the Panel's Major Findings, between 2005 and 2009 in the Pacific Northwest, oyster production declined 22%.<sup>1</sup> California's commercial and recreational fishing industries are also at risk of OAH, impacts to which could have profound economic and social ramifications—the commercial and recreational fishing industries generate \$25.7 billion in sales annually and generate 158,000 jobs annually.<sup>2</sup>

In spite of the threats ocean acidification and hypoxia pose, the development of a comprehensive policy around ocean acidification has been thwarted by its close relationship with climate change. By sharing the same principal cause—rising CO<sub>2</sub> emissions—ocean acidification is often assumed to be fully addressed by climate change policies. In convening the Panel and executing its recommendations, OPC has established California as a leader in proactively addressing the threats of OAH through science to address immediate OAH research needs that can then guide management decisions. The recent signing of AB 2129 and SB 1363 into law sends a clear mandate to OPC to administer the Ocean Acidification and Hypoxia Reduction Program and further demonstrates California's leadership in preparing for and ameliorating the impacts of OAH.

---

<sup>1</sup> Chan, F., Boehm, A.B., Barth, J.A., Chornesky, E.A., Dickson, A.G., Feely, R.A., Hales, B., Hill, T.M., Hofmann, G., Ianson, D., Klinger, T., Largier, J., Newton, J., Pedersen, T.F., Somero, G.N., Sutula, M., Wakefield, W.W., Waldbusser, G.G., Weisberg, S.B., and Whiteman, E.A. The West Coast Ocean Acidification and Hypoxia Science Panel: Major Findings, Recommendations, and Actions. California Ocean Science Trust, Oakland, California, USA. April 2016.

<sup>2</sup> Id.

While we support funding for all six OAH projects, the following three are of special interest to NRDC:

- *4a: Advance integrated modelling of California's coastal ocean to inform ocean acidification and hypoxia policy.* Increasing the utility of OA models through a more site-specific focus will serve as an essential tool to improve our understanding of the variabilities of OAH and could eventually improve forecasting capabilities to protect the State's fisheries.
- *Project 4e: MPA effectiveness and ecological responses in the face of changing ocean conditions.* NRDC was heavily involved in the creation of the State's landmark MPA network and is committed to safeguarding the network's integrity and vitality. Learning the role that MPAs can play in building resilience to the impacts of changing ocean conditions could provide some of the foundational science needed to better understand the value of MPAs in California, nationally, and internationally. This knowledge could inform MPA design in the future. Separate but related to this work is understanding how OAH will affect the State's MPAs and then managing them accordingly.
- *4f: Inventory of Ocean Acidification and Hypoxia Hotspots.* In partnership with academics and NOAA scientists, NRDC has also advanced a methodology for assessing social vulnerability to OA. As OPC and OST undertake this initial inventory, NRDC urges the organizations to integrate social vulnerability into its statewide OAH inventory. Understanding which regions are particularly vulnerable to OAH impacts will enable the state to prioritize regional needs and provide target adaptation measures.

While California leads the nation in setting targets for renewable energy and emissions reductions, existing climate policies, as currently written, will not adequately address the threat ocean acidification poses to California's marine resources, which are key components of its social fabric and economy. Adaptation strategies for ocean acidification will be very different from those associated with the impacts of climate change. The proposed OAH projects and further implementation of the Panel's recommendations will provide the foundation for scientifically based policy that will enable California to adapt and prepare for the impacts of OAH. We urge you to support funding for the proposed OAH projects as a crucial next step to implement the Panel's recommendations.

We are also writing to express our strong support for using Prop 84 funds to support the two initiatives targeted at strengthening California's MPA network. NRDC has played a crucial role in the implementation of the Marine Life Protection Act (MLPA), and we remain deeply committed to the success of the MPA network going forward. We agree with OPC that outreach, education, and enforcement are fundamental to the ongoing success of California's MPA network and the protection of California's valuable marine resources. The MPA Collaboratives play a vital role in educating communities about California's MPAs, including outreach messaging, educational guidelines, and enforcement protocols. Strengthening the work of the Collaboratives through a Collaborative network small grants program (proposed project 4k) will be an important step in strengthening implementation of the MPA network. Similarly, funding a second round of MPA signage (proposed project 4l) would greatly enhance public awareness of the MPA network and is a key step in ensuring compliance with MPA requirements. Just as the public benefits from interpretive signs in the State's terrestrial parks, so will the public benefit from learning about their coastal and offshore resources.

Finally, tackling marine pollution is one of the most daunting challenges natural resource managers confront in conserving ocean health. NRDC congratulates OPC for their wide ranging and substantial investment in addressing marine debris in California. Updating the 2008 Ocean Litter Strategy Update, Dungeness Crab Fishing Gear Working Group, and Creating an Unpackaged Community in the Bay Area are solution-oriented projects that will address some of the most pressing marine pollution issues in California.

We thank OPC for its strategic approach to leveraging Prop 84 funds to secure the health of California's ocean environment and encourage OPC to act on staff recommendations. Funding the proposed projects with Prop 84 funds will help OPC address key ocean threats, and poise California to lead with cutting edge research and policies to protect its publicly-held marine resources.

We thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read "Elizabeth Murdock". The signature is fluid and cursive, with a long horizontal stroke at the end.

Elizabeth Murdock  
Director, Pacific Ocean Initiative  
Natural Resources Defense Council