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NATIONAL OCEAN COUNCIL

Name: **Angela Licata**

Organization: NYC Environmental Protection

Path:

Comment: Attachment submitted via mail.



**Environmental
Protection**

Carter H. Strickland Jr.
Commissioner

Angela Licata
Deputy Commissioner
Of Sustainability
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Submitted electronically
February 22, 2012
<http://www.WhiteHouse.gov/oceans>
Copy to:
National Ocean Council
722 Jackson Place NW
Washington, DC 20503

Re: Comments on draft *National Ocean Policy Implementation Plan*

Dear Sir/Madam:

The draft National Ocean Policy Implementation Plan is a welcome effort to streamline the procedures and tools of various federal agencies as well as the programmatic requirements for State, regional and local government agencies. The New York City Department of Environmental Protection (DEP) sincerely commends this important effort. DEP appreciates that this Plan's outcomes, including streamlined compilation of data, data availability at one website, and increased emphasis on ecosystem valuation-based approach to coastal management, will be useful to local governments. In particular, the City believes that ecosystem-based management (EBM) is the best approach to quantifying the monetary and non-monetary benefits of water quality projects. Following are a number of questions or comments on this document, by which DEP requests additional guidance or clarification in the final Implementation Plan.

1. DEP suggests a minimization of the use of acronyms to enhance readability of the text. Acronyms that are used infrequently should be avoided.
2. Various federal entities are currently working on dozens of guidance documents or collaborative decision documents, anticipated to be issued in the next 1-10 years, which will benefit the existing ecosystem restoration programs undertaken by local, regional and state government agencies. DEP recommends that the production of these guidance documents be expedited to capture significant efficiency gains and cost savings. As an example, development of guidance for all federal agencies regarding implementation of EBM is slated for completion in 2013, and EBM is anticipated to be incorporated into federal agencies' planning and review processes by 2016. However, existing, ongoing coastal restoration projects can benefit from use of this unified EBM framework.
3. The Implementation Plan envisions the identification of three EBM pilot implementation areas. Can local governments volunteer as potential EBM pilot areas?

4. DEP supports the integration of observation systems and data maintained by various federal and other agencies, as well as universities and volunteer organizations. To facilitate this process, DEP recommends the development of a uniform protocol for data collection and compilation, along with consistent procedures for quality assurance.

5. On Page 58, precipitation data projections should be clearly identified under Action 3, similarly to the manner in which sea level rise projections are identified. Precipitation data projections are a major concern for the Northeast region, and particularly for local governments such as NYC; regional and local projections at 10-15 minute intervals will be beneficial as NYC's urban drainage systems are very vulnerable to increases in precipitation intensities. Models need to be enhanced to provide projections at this time-scale, and additional guidance should be provided on scientific sensitivity analyses to assess vulnerability.

DEP appreciates the opportunity to comment on the draft Plan as well as your consideration of our comments.

Sincerely,



for Angela Licata
Deputy Commissioner for
Sustainability

cc: A. McCamphill
M. Sherer

NATIONAL OCEAN COUNCIL

Name: **Kathleen Leyden**
Organization: SPO Maine State Planning Office
Path:
Comment: Attachment submitted via mail.

SPO



Maine State Planning Office

Executive Department

PAUL R. LEPAGE
Governor

PETER J. ROGERS
Acting Director

February 27, 2012

Nancy Sutley, Chair
Council on Environmental Quality
The White House
1600 Pennsylvania Avenue, NW
Washington, DC 20500

FILED ELECTRONICALLY

RE: National Ocean Council; Comments on the Draft National Ocean Policy Implementation Plan

Dear Ms. Sutley:

I am writing to provide the State of Maine's ("State") comments on the National Ocean Council's ("NOC") draft National Ocean Policy Implementation Plan ("Plan") which outlines proposed federal actions to address the nine priority objectives identified in the final recommendations of the Interagency Ocean Policy Task Force and incorporated by reference in Executive Order 13547.

Overall, the State commends the NOC on production of a document that is well-organized and well-presented and reflects consultation with coastal states and their citizens. The importance to the credibility and success of the NOC's work of continued federal commitment to such consultation cannot be overstated. As noted in various comments below, further refinements of the Plan are needed to recognize and adapt to the vitally important roles, responsibilities, and authorities of coastal states and to ensure that, as implemented, the Plan does build on and does not detract from current ocean and coastal resources management efforts.

General Comments and Policy Recommendations

The State expressed a number of concerns about this national planning initiative in its comments on the proposed Strategic Action Plan ("SAP") and full-content outlines for the SAPs that led to development of the proposed Plan. A number of these concerns centered on the lack of clarity regarding whether and how the New England Fisheries Management Council ("NEMFC") and comparable fisheries councils would be involved in the process. Recently, NOC staff confirmed that a representative from the NEMFC and its fellow councils will be eligible to serve as a member of its pertinent regional planning body. Accordingly, the State is optimistic that the regional coastal and marine spatial planning process that is a core element of

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the Plan may be conducted in a manner that acknowledges and ensures due consideration of fisheries councils' knowledge and expertise and helps inform discussion about the issues and concerns of the fishing industry.

The State continues to have the following general concerns about the Plan's overall approach, focus, and concepts, some of which were expressed in its comments on the draft full content outlines of the SAPs. The following comments and suggestions address these concerns:

- **Clarify how federal agencies intend to work with coastal states and others**

In general terms, the Plan acknowledges the importance of federal-state coordination. However, it is largely silent on how federal and state agencies will work together. Although the Plan's limited focus on federal agencies' actions is understandable given its basis in an executive order, more explanation of how federal agencies will work with their state counterparts is necessary. The Plan should be designed and executed to maximize opportunity to compliment, and not duplicate or conflict with, related state efforts. This coordination is particularly important concerning direct communication with coastal stakeholders with whom states are more likely to have well-established and on-going working relationships. This approach will also help make the most effective use of federal as well as state resources. The Governance Coordinating Committee would provide a useful forum for discussing and providing more detailed recommendations on this issue.

- **Designate a lead federal agency for each action**

The Plan helpfully lists the key federal agencies to be involved in implementation of each action. This clarification addresses in part the State's prior comment on the need for assurance of federal agency coordination throughout the Plan. The State suggests that the Plan also designate the lead federal agency for each action to help increase accountability and oversight for progress under the Plan, for coordination with coastal states and others, and for development of more refined work plans that further detail federal agencies' respective roles.

- **Complement and don't detract from existing ocean and coastal resources management efforts**

The Plan states that one may not assume that any additional federal funding to carry it out will be provided. The State remains concerned that this effort may divert resources needed to fulfill objectives under existing ocean and coastal resources management, water quality, and related ocean and coastal-oriented programs, including those under the Coastal Zone Management Act and Clean Water Act, that have long-standing records of success in addressing issues and creating opportunities for beneficial use of the marine environment. The State urges the NOC to work to ensure that these programs, along with fisheries councils' resource planning-related work, help provide a firm foundation for the Plan and are not undermined by diverting funds from them to support this national planning effort. As noted below, the State sees the Plan's proposals for federal agencies to budget their related activities across agencies as particularly important to making optimal use of available resources.

- **Optimize use of existing information and analyses**

The draft Plan does not plainly direct federal agencies to optimize use of existing studies and analyses of pertinent ocean and coastal issues, problems, and opportunities. Such an approach could help make efficient use of available resources. To this end, it would be helpful to include under each action a threshold task focused on identification, assessment, and consideration of such information.

- **Ensure the pre-requisites for effective coastal and marine spatial planning are met**

In the Plan, coastal and marine spatial planning (CMSP) is a principal tool for meeting a number of the National Ocean Plan's goals; CMSP likewise has the potential to serve a number of the State's ocean policy-related goals. In keeping with prior comments and on the eve of kick-off the Northeast region's ocean planning effort, the State wishes to re-emphasize the importance of assurance that:

- Regional coastal marine spatial plans are not zoning maps but designed as dynamic, information-oriented tools to assist public and private decision-makers in using the best available science and information to assess and to address opportunities for beneficial uses of ocean and coastal resources;
- Fisheries managers and the interests of the fishing industry and other existing users and stakeholders of the marine environment, including the New England Fisheries Management Council and interstate management bodies such as the Atlantic States Marine Fisheries Commission, are appropriately represented at all planning and decision-making stages;
- Just as the Plan includes caveats that federal action to fulfill its ambitions depend on the availability of funding, the nature and extent of the State's participation in CMSP-related efforts will depend on availability of funding and related policy considerations and priorities;
- Maine's interests are considered on par with those of other more densely populated and more developed states in its Northeast planning region;
- Public and private resources available for regional planning are used strategically in the interests of the overall regional planning effort - and therefore, at the outset of the Northeast region's planning effort, data collection and assessment work needed in Maine's coastal waters and adjoining federal waters (which make up about half of the region's ocean area) need to be top regional priorities to ensure a baseline of information comparable to that in New England sister states that have state-prepared ocean plans; and

- The unique resources and environmental conditions of Maine’s coastal waters, and data gaps needed to consider them, are taken into consideration in developing policy options that may affect uses of or in its coastal waters - one size will not fit all.
- **Focus on specific, tangible natural resources-based outcomes**

In finalizing the Plan, the State continues to urge that the Plan be as specific as possible in articulating each objective's aims and desired outcomes in terms of progress in protecting or enhancing ocean and coastal resources, environmental conditions, and related opportunities for beneficial, natural resources-based human uses. The outcomes stated for the Plan's ecosystem-based management and CMSP objectives, for example, are predominantly process-oriented. The true measure of the Plan's success will be taken in terms of improved health and productivity of the ocean environment and expansion of opportunities for sustainable economic development. Better governmental efficiency and information resources, although necessary, are means to such ends.

- **Prioritize and encourage flexibility to address regionally significant issues**

The Plan would benefit from an additional hard look at and prioritization of its proposed actions in light of the reasonable expectations for federal funding to address them. For example, the Plan includes several long-standing environmental monitoring-related proposals that have languished due to lack of federal funding. Implementation of the draft Plan in its entirety would be a massive undertaking involving not only dozens of federal agencies, whose roles are indicated in the Plan, but also many state, local and tribal governments and private parties whose active involvement is integral to the Plan's success. In addition, as implemented the Plan should provide sufficient flexibility to ensure that CMSP and other efforts reflect regional priorities by focusing on the opportunities, issues, and concerns of primary importance in each region.

Comments on Specific Actions Proposed

The following comments highlight issues or concerns regarding actions and milestones identified under the Plan's objectives.

Ecosystem-Based Management (EBM)

The State supports ecosystem-based management in principle due to its emphasis on grounding public policy in the best available science and ever-improving data and information. The State offers the following comments and questions on how the Plan would put this concept into practice.

Action 1 - Framework for collaboration and a shared set of goals regarding EBM.

While the Plan expressly addresses only collaboration among federal agencies, the State is confident that there is widely-shared understanding that success in integrating EBM into natural resources management, planning, and decision-making requires that federal and state agencies and others work closely together. The Plan's proposed review of existing laws and

regulations for opportunities for and obstacles to EBM is of critical importance. To be successful, this review must be done in close consultation with Maine and other coastal states.

The State urges that the NOC give special and careful consideration to use of the Coastal Zone Management Act ("CZMA") and National Environmental Policy Act ("NEPA") as cornerstones of the policy framework for implementation of the Plan's EBM-related provisions. The CZMA is a well-established vehicle designed and long-used to encourage and in part require federal-state consultation regarding federal activities in coastal waters. Federally-approved state coastal programs also provide a well-established vehicle for coordinating, facilitating, and funding state implementation of EBM-related efforts. In the event that the NOC does not choose to use the CZMA to ensure necessary collaboration regarding EBM initiatives, the State urges that it ensure that the Plan explains how the means chosen relates to state and federal authorities and obligations under the CZMA.

Procedural in nature, NEPA provides a primary tool that all federal agencies must employ to ensure a hard look at potential effects of a proposed action on the human environment. Assurance that environmental analyses conducted under NEPA embrace EBM concepts could go a long way to ensuring that EBM is widely-integrated into the environmental review process.

The State acknowledges and appreciates the Plan's further clarification of its use of the term "ecosystem-based management." Notwithstanding this further clarification, as noted in prior comments, the State has concerns about amending decision-making criteria under key federal laws, such as the Magnuson-Stevens Fisheries Conservation and Management Act and the Endangered Species Act, pending development of a more mature and shared understanding of the meaning and application of EBM.

Action 2: Science framework to support EBM.

To be effective, implementation of EBM must be based on sound science. With respect to many of the NOP's objectives, the most appropriate role for federal agencies and best uses of federal funding center on data collection and analysis, on-going monitoring and assistance with indicator development, and development of assessment tools and technologies that can be used by state and local governments. For the most part, Maine and other individual states lack the resources or authority needed for this type work, particularly at a regional scale.

Given constraints on federal agencies' budgets, collaborative planning and budgeting among and across federal agencies seems critical to ensuring strategic, well-coordinated use of limited federal funds available to support scientific research and data collection and analysis. A national scientific research agenda that stemmed from such an inter-agency process has great potential to help ensure well-targeted, efficient use of federal dollars and to help influence and leverage academic and industry investments in research to address key problems.

Action 3: EBM-related training and education

The State suggests that federal agencies work closely together to ensure their training-related programs and activities are well-coordinated and dove-tail with, build on, or utilize any

related state programs. The cross-agency budgeting called for by the Plan would be an important tool for ensuring efficient integration of federal agencies' efforts. To be effective, federal training must be adaptable to state and regional needs and priorities. In addition, these federal efforts should incorporate state and local expertise and knowledge to the extent possible.

The State also urges the NOC to shape EBM-related training in part to the relationship between EBM and analysis required under the National Environmental Policy Act (NEPA). See comment under Action 2, above.

Action 4: Pilot projects.

Conducting small pilot efforts in priority areas to demonstrate the feasibility of EBM in practice seems a sensible approach. Using well-designed monitoring plans, one or more EBM pilot project should explore adaptive management techniques that foster development and deployment of emerging ocean technologies, including those for offshore wind energy, in ways that help avoid and minimize impacts on existing uses and resources.

Through the work to date of the states in our region, the Northeast Regional Ocean Council ("NROC"), and the Gulf of Maine Council on the Marine Environment ("GOMC"), the Northeast is a prime location for an EBM pilot project. With adequate provision for necessary supplemental studies, data collection and analyses, such a pilot could also help address data gaps and advance the Northeast's regional ocean planning process as a whole.

Inform Decisions and Improve Understanding

Action 1: Advance fundamental scientific knowledge.

The State recognizes the need for and potential benefits of well-coordinated and prioritized federal investment to advance scientific understanding of our oceans (see comment under EBM section, Action 2, above). The State continues to have concerns, however, about potential diversion of funds away from fisheries research and other matters of importance to Maine and other coastal states. Close federal-state cooperation will be needed to ensure appropriate consideration of states' research-related interests, needs, and priorities.

Action 3: Provide data and information tools for science-based decision making.

The State strongly supports efforts to make the best available information readily available to public and private decision makers. The State urges close federal-state cooperation to avoid duplication of effort and ensure consistency with related state-specific efforts and to maximize the effectiveness of these efforts.

Observation, Mapping and Infrastructure

Action 7: Integrated ocean and coastal data collection, processing, and management system

The State suggests that this action be among the Plan's top priorities. Integration of the wide range of current and foreseeable ocean data collection efforts to produce a manageable and readily usable tool seems a key component of the overall Plan. With mapping capability, such a tool would greatly aid in accomplishing a number of the NOP's objectives, particularly those regarding coastal and marine spatial planning. Such an endeavor is necessarily multi-state nature and appropriately a federal responsibility.

Coordinate and Support

Action 1: Support for regional partnerships

Given the Plan's focus on coastal and marine spatial planning and its regional focus, this action is of particular importance. For efficiency's sake and to avoid replication or duplication of effort, the State recommends that, as implemented, the Plan build on and enhance promising, on-going regional efforts, including those of NROC. Moreover, in keeping with the role of NROC and comparable regional entities, the Plan should emphasize and enhance support for data collection and analysis needed to advance regional planning efforts.

Action 3: Barriers to achieving the National Ocean Plan's goals

Review of federal laws and their inter-relationships to identify inconsistencies, redundancies, and other inefficiencies as well as regulatory gaps that may frustrate achievement of the NOP's goals is a key part of the Plan. The NOC should ensure that the Plan also involves a careful analysis of how state and federal laws interact and may be better coordinated. Although as in previous, related documents, the Plan states that it will be implemented within existing authorities, the State continues to have concerns about extension of federal authority into areas of state authority and responsibility. Any analysis of the legal framework must include due consideration of and due deference to coastal states' autonomy, authority, and Public Trust-related responsibility to manage state-owned submerged lands and ocean resources in the public benefit. Further, any such analysis must involve all stakeholders before additional or changes to existing legal authorities are proposed.

Action 4: Cross-cutting budget analyses

This action is vital to the overall success of the Plan, and essential to help ensure the most efficient use of available resources. This action has potential to work synergistically with and help support many of the Plan's actions, including those that aim at a well-concerted national scientific research plan and harmonized data gathering and assessment efforts.

Action 5: Improve permitting efficiency

As noted elsewhere, State strongly supports the basic goal of this action and stresses that federal agencies must consult and work collaboratively with their state counterparts in exploring ways to achieve it. The milestones focus mainly on aquaculture. This focus should be expanded to address the leasing and permitting processes for renewable ocean energy and other beneficial uses where significant concerns regarding potential regulatory timelines and related complexities have been expressed.

Regional Ecosystem Protection and Restoration

As noted in prior comments on this topic, the State recommends that any regional protection and restoration efforts that may be undertaken in the Gulf of Maine build on the strong and cooperative working relationships and information and analyses developed through the GOMC and feature appropriate consultation with our region's partners in Canada. In addition, further clarification of the relationship between this objective and its related actions and the coastal and marine spatial planning objective and its related actions would be useful.

Action 2: Reduce loss and improve understanding of coastal wetlands

The State currently has strong programs for management and protection of coastal wetlands. Accordingly, the State recommends that the Plan's milestones reflect and build on the work of Maine and other jurisdictions, non-profits, and academic institutions in this area.

Action 6: Identify nationally significant marine areas in need of protection

The Northeast region is well-positioned to work with NOAA to help develop and showcase the gap analysis called for in this action's milestones. Consideration should be given to undertaking this work in relation to the pilot project proposal discussed under Action 5. In addition, sites off Maine that may be considered for additional protection, including those that remain on the National Marine Sanctuary Site Evaluation list, may be of considerable importance to Maine fishermen; any such consideration should be done in close consultation with Maine agencies and stakeholder groups.

Action 7: Improve the effectiveness of coastal and estuarine habitat restoration projects

The State recommends that, as part of the cross-agency budgeting called for by the Plan, federal agencies work together to coordinate coastal land acquisition and restoration programs. In undertaking this effort, federal agencies should reach out to coastal states and others to explore opportunities for complementary efforts.

Water Quality and Sustainable Practices on Land

Education of the general public on the effects and larger implications of individual choices and actions on water quality and reasonable steps to improve those choices and related behaviors is common theme that should be emphasized in actions under this objective.

Regulatory requirements instill such awareness in the regulated community. There is a need for enhanced understanding among and consequent actions by members of the general public who collectively have a considerable influence on and make a considerable contribution to nutrient, sediment, toxic, pathogen loading to state and federal waters.

Overall, the milestones associated with this action appear quite ambitious under the proposed timelines, especially considering that a significant amount of collaboration with local, state, and regional partners would be needed.

Action 1: Reduce rural sources of pollutants

Atmospheric deposition to rural areas and reduction strategies need to be considered for protection of all rural receiving waters and downstream waters. Consideration should also be given to point sources as cumulative impacts to loadings, even if contributions are minor compared to non-point sources. Section 319 program targets should be identified nearly entirely by states and funding prioritized for local implementation of comprehensive strategies based on states' strategies. State resources may still be insufficient to address all nutrient reduction goals established by 2015. Generally, incentives to address non-point source pollutant loadings by private landowners, especially, need to be stronger to enable measurable improvements. Additional federal funding will be critical to implementation success.

Action 2: Reduce urban sources of pollutants

The State questions the feasibility of milestones under this action. Milestone 1 regarding air deposition of pollutants in the short term (2012) is an extremely ambitious and unrealistic goal since significant coordination among EPA, states, municipalities, the regulated community and the general public will be needed to achieve reductions. Milestone 4 will require significant state involvement and resources above and beyond those available or foreseeable.

Milestone 2 should also identify those significant municipal wastewater treatment plants that do not yet have nitrogen or phosphorus permit limits but are located in receiving waters or upstream of waters that have been identified as priorities for nutrient reductions.

Action 3: Minimize impacts of hypoxia

The Plan should specify how the 12 states for state-wide nutrient reduction strategies will be chosen. The State suggests that these states be well-distributed around the nation's coastline and Great Lakes to enable strategy development and implementation for states directly influenced by hypoxia problems but perhaps not directly influenced by the major hypoxic zones, i.e. Gulf of Mexico and Chesapeake Bay.

Action 4: Minimize impacts of harmful algal blooms

Harmful algal blooms (HAB) considered under this action should also include noxious blooms that, in the absence of neurotoxin production, can still have devastating effects on estuarine and coastal nearshore marine life. Milestone 1 should include use of inshore buoys in

addition to offshore buoys based on the location of known cyst beds. Generally, HAB-related actions should incorporate partnerships with states and academics to best inform placement of monitoring platforms, monitoring strategies, communication of bloom events to the public, and other decisions. Research scientists in the Northeast have extensive knowledge of HAB monitoring and related infrastructure needs and will be vital to the success of this action in our region.

Action 5: Address threat of toxics and land use practices

The State endorses a number of the aspects of this action, which may be further improved by ensuring close coordination with and use of existing, related efforts. Where existing programs are already in place for swimming beaches and shellfish harvesting areas, as in Maine and other states, a Health Early Warning System should be designed in consultation with state program managers to avoid needless duplication and improve its utility for all parties. The State strongly encourages inclusion of Milestone 2 involving outreach programs, especially for seafood processors. Milestone 3 can be addressed in part through EPA's National Coastal Condition Assessment program data, and also through states' efforts to monitor contaminants in indicator species. Although microbial source tracking has great potential for determining the origin of contaminants (especially fecal), a rapid field technique and consistent and less expensive lab techniques would facilitate states' abilities to conduct these needed investigations. The Plan's holistic "atmosphere-watershed-coastal ocean" approach is laudable. A concerted national and possibly international effort will be needed to curtail and remediate atmospheric contributions.

Action 6: Reduce impacts of marine debris and trash

Milestone 1 would be strengthened by publishing a flyer, written for the lay person, for distribution in bait shops, fishing and outdoor equipment stores, public docks, popular fishing holes, marine supply stores, and comparable locations. Milestone 5 should be modeled in part after successful state beach clean-up programs and other established community-based actions already in place. One potentially important addition to this action would be a school-based education program tailored to a younger audience.

Action 7: Identify, protect, and maintain high quality areas

The State strongly encourages inclusion of Milestone 3, which involves stakeholder involvement in monitoring programs and suggests that the Plan build on existing efforts. Some such programs already exist and are being led by passionate individuals who play a vital role in supplementing monitoring by state agencies. However, many such programs have little or no funding; volunteers could be utilized to a much greater extent if adequate funding were available. Federal assistance, funding as well as training in monitoring techniques, would be very helpful to state agencies in Maine and elsewhere that are strapped for resources.

Changing Conditions in the Arctic

The State has no specific comments on this objective at this time.

Coastal and Marine Spatial Planning

In addition to its comments above regarding overall prerequisites to be met to lay the groundwork for successful CMSP, the State offers the following comments on proposed actions regarding this objective:

Action 3: By 2015, incorporate all pertinent data into the National Information Management System and Data Portal

As emphasized throughout its comments, the State applauds the Plan's overall goal of the making the best available, scientifically sound information readily accessible to public and private sector decision makers. The National Information Management System and Data Portal has great potential to contribute to this goal. The Plan sets 2015 as the deadline for completion of federal datasets. However, the Northeast region, whose constituent states are national leaders in CMSP, needs access to this information well before 2015 in order to move forward with regional planning as intended. Accordingly, the Plan should make special provision for ensuring that the complete datasets for the Northeast region are made available to the Northeast region's planning body in an alternative and efficient way in 2012 or as soon as practicable.

Action 4: Establish regional planning bodies

In marked contrast to much of the rest of the Plan, this action, like Action 5, below, makes virtually no mention of role of the NOC or federal agencies and attempts to outline key steps in an action plan that RPBs would implement. This is problematic. The RPBs are voluntary organizations whose members represent not only federal agencies, but also states, federally-recognized Indian tribes, local governments, and fisheries management councils. It is not appropriate for the NOC via the Plan or otherwise to develop a scripted action plan for such a unique and diverse voluntary group. Properly focused, this section would address actions that federal agencies would take to support regional planning efforts. More specifically, this action should address tasks and related timelines, including but not limited to:

- Final guidance to assist RPBs;
- Letters to state governors inviting them to designate RPB members;
- Letters to tribes inviting them to designate RPB members;
- Information clarifying how RPB members to represent local government and fisheries management councils will be selected;
- Completion and final approval of the model charter by the NOC and related criteria and guidance for RPBs on how RPBs' charters will be reviewed; and
- Specific directives from federal agencies' headquarters to their regional offices, as well as headquarters personnel as appropriate, regarding support for RPBs

Action 5: Within three to five years of their establishment, nine RPBs (one per region) have a NOC-certified CMSP

As with Action 4, above, this action should focus on what federal agencies will do to support and advance the work of the RPBs and not purport to predetermine or dictate the nature of the outcome of that work. More specifically, this action should address tasks and related timelines, including but not limited to:

- Development of guidelines that explain how the NOC will review regional plans, the process and criteria for plan certification, and the implications of grant or denial of certification; and
- As further discussed below, better information on the benefits of CMSP and how, through federal agency activities proposed in the Plan, those benefits may be realized.

It is crucial that the Plan articulate, emphasize, and ensure the strong connection between the potential benefits of CMSP and work that federal agencies will undertake to address barriers to realizing those benefits. Developing plans for federal agency actions now (beginning in 2012 and continuing into 2013) is vital to assure state, tribal, local, and fisheries management council members serving on RPBs of the value of the potentially lengthy CMSP process beyond that of the plan alone. This assurance is also important to attract and retain the engagement of industry and other stakeholders throughout the process.

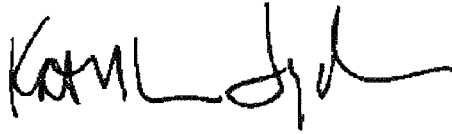
Improvements to the Plan are needed to forge the necessary connection between the CMSP process and desired practical outcomes. For example, the Plan (page 89) discusses efficiencies in regulatory processes that can result from CMS, but does not adequately specify federal agency activities to address the issue that the regional scale data useful for CMSP will not in many instances be sufficiently site-specific to be used for regulatory purposes. A well-concerted, regional-scale effort among federal agencies to collect new data to help inform regulatory decisions, such as bird, bat and marine mammal data to assist in ocean wind power planning and regulation, would be a related initiative that helps bring home the benefits of CMSP. An NOC-conducted policy analysis on how a NOC-certified CMSP or a state-level plan, such as those developed by Massachusetts, Rhode Island or Oregon, may be used to better inform and streamline the NEPA process or environmental review needed for decision on one or more federal and state lease or permit decisions would also help show the practical benefits of CMSP.

Using the approach for other objectives in the Plan, a lead federal agency and key cooperating agencies should be identified for each potential benefit listed in the sidebar on page 86. The lead federal agency should be responsible for development of a concrete plan for activities federal agencies will undertake in the CMSP process to assist in realization of these benefits. This plan should be developed and submitted to the NOC prior to or as soon as practicable following establishment of each RPB and periodic reports made to NOC on progress and any changes in federal agencies' supporting efforts.

* * *

Thank you for the opportunity to provide comments on the draft Plan. I look forward to working with you as work on the Plan unfolds.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kathleen Leyden', with a stylized, cursive script.

Kathleen Leyden
Director
Maine Coastal Program

cc:/

Senator Olympia Snowe

Senator Susan Collins

Representative Michael Michaud

Representative Chellie Pingree

Patricia Aho, Commissioner, Maine Department of Environmental Protection

William Beardsley, Commissioner, Maine Department of Conservation

Patrick Keliher, Commissioner, Maine Department of Marine Resources

Carlisle McLean, Office of Governor Paul LePage

Peter Rogers, Acting Director, Maine State Planning Office

Name:

Organization: Kitsap County Board of Commissioners

Path:

Comment: Attachment sent via mail.



KITSAP COUNTY BOARD OF COMMISSIONERS

Efficient, accessible and effective county services

February 22, 2012

Robert Gelder
DISTRICT 1

Charlotte Garrido
DISTRICT 2

Josh Brown
DISTRICT 3

MS. NANCY SUTLEY
DR. JOHN HOLDREN
NATIONAL OCEAN POLICY COUNCIL MEMBERS
NATIONAL OCEAN COUNCIL
722 JACKSON PLACE, NW
WASHINGTON DC 20503

Re: President's National Ocean Policy Action Plan

Dear Chairs Sutley, Holdren and National Ocean Council Members:

Kitsap County is situated in the Central Puget Sound region of Washington State and possesses over 270 miles of shoreline and associated nearshore habitat. The Kitsap County Board of Commissioners is writing to support the National Ocean Policy draft Implementation Plan. The vitality of our economy and of our citizens depends upon healthy shorelines and on clean and protected saltwater. We are constantly reminded that proper and careful management of our ocean and coastal resources areas is a key factor that supports our vibrant, healthy shoreline communities. Our fragile saltwater environments depend on clean oceanic waters and healthy intact coastal ecosystems. We believe that the implementing actions described in the Plan will improve accountability and better leverage scarce resources on all levels of government so that the sustainability of our ocean and coastal resources is ensured.

We believe that the plan should place more emphasis on habitat protection. In this County and throughout this state, salmon fisheries serve vital natural, cultural and recreational purposes. The recent findings on recovery of federally-listed salmon published by the US Department of Commerce point out that for the State of Washington and for the Puget Sound region in particular, habitat protection especially for our endangered salmon stocks is failing to meet goals. We believe more needs to be and can be done and that the President's National Ocean Policy can help address the shortfalls in salmon recovery.

With this important addition, President Obama's Implementation Plan will provide a better guide to all levels of government and the private sectors to protect, maintain

and restore our nation's oceans and coasts and help ensure resilient, vibrant coastal economies and environments for present and future generations.

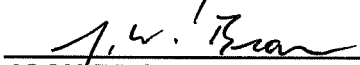
Once again, thank you for this opportunity to provide comment. We look forward to following the successful implementation of the President's National Ocean Policy.

BOARD OF COUNTY COMMISSIONERS

KITSAP COUNTY, WASHINGTON



ROBERT GELDER, Chair



JOSH BROWN, Commissioner



CHARLOTTE GARRIDO, Commissioner

cc: Department of Community Development
Department of Public Works
Department of Parks and Recreation
Hood Canal Coordinating Council
Suquamish Tribe
Port Gamble S'Klallam Tribe
Skokomish Tribe
Point-No-Point Treaty Council
Alliance for a Healthy South Sound LIO
Interested Parties List

Name: **Takiora Ingram**

Organization: U.S. All Islands Coral Reef Committee

Path: http://edit.whitehouse.gov/sites/default/files/webform/noc-_aic_comments_on_nop_implementation_plan_1.doc

Comment: I submit the attached comments on behalf of the U.S. All Islands Coral Reef Committee

U.S. All Islands Coral Reef Committee

Comments on the Draft National Ocean Policy Implementation Plan

February 24, 2012

General Comments

The U.S. All Islands Coral Reef Committee (AIC) welcomes the Draft National Ocean Policy Implementation Plan which describes more than 50 actions the Federal Government will take to improve the health of our oceans, coasts and Great Lakes. The AIC appreciates the opportunity to provide comments on the plan.

We agree that the draft Implementation Plan reflects federal actions needed to address the nine priorities for the oceans, coasts and the Great Lakes to achieve the vision and charge of the National Ocean Policy. We are optimistic that the Plan will ensure the Federal Government targets limited resources more effectively to deliver demonstrable results for the nation, including predictability for users, more efficient and coordinated decision-making, and improved sharing of data and technology.

We agree with the four themes that guide the draft Implementation Plan: Adopt ecosystem-based management (EBM); Obtain, use and share the best science and data; Promote efficiency and collaboration; and Strengthen regional efforts. CMSP is an important tool for implementing EBM.

We endorse Plan's intention to ensure that the Federal Government targets limited resources more effectively to deliver demonstrable results for the American people, including predictability for users, more efficient and coordinated decision-making, and improved sharing of data and technology.

Since 1994, the AIC has represented the interests of the Governors of the nation's seven coral jurisdictions¹ (states, territories and commonwealths) on issues related to the sound management and development of coastal and ocean resources.

The states and territories are on the front lines of the work of balancing competing uses in the coastal zone, managing the development of traditional and renewable energy sources, and adapting to climate change impacts. The seven states and territories that are members of the AIC are in a unique partnership position to lead efforts to address the most pressing challenges facing our oceans and coasts.

Like the federal government, our member states and territories are sovereigns, landowners, regulators, and managers of marine and coastal resources. The jurisdiction of coastal states extends seaward to encompass significant ocean areas, resources, and uses, out to three miles in most cases and, in a few cases, beyond three miles.

Coastal states and territories have Public Trust responsibilities for the nation's coastal submerged lands and state ocean waters and for protecting fish and wildlife resources in these areas. These

¹ *American Samoa, Commonwealth of the Northern Mariana Islands (CNMI), Florida, Guam, Hawaii, Puerto Rico, U.S. Virgin Islands*

responsibilities are exercised on behalf of all citizens, including future generations. States regulate and manage these marine and coastal resources, often in partnership or consultation with federal agencies. In addition, coastal states and territories have specific authority delegated to them under the Coastal Zone Management Act to ensure that activities and permits of federal agencies that may affect their coastal zone are consistent with approved state policies. Also, member jurisdictions of the AIC have specific mandates under the Coral Reef Conservation Act and Presidential Executive Order 13089 (1998) to protect and conserve coral reefs in the United States. Thus, AIC recommends that the NOP Implementation Plan reflect these unique Constitutional responsibilities and the states and territories' major role in managing ocean and coastal resources.

Under the Public Trust Doctrine, coastal states and territories have trust responsibilities over these resources. Also, under the Coastal Zone Management Act, Coral Reef Conservation Act and Presidential Executive Order 13089, coastal states and territories have the responsibility to manage coastal and coral reef resources within the coastal zone and review activities outside of the coastal zone that might affect it.

RECOMMENDATIONS

Given these significant roles, the AIC strongly recommends that the federal government

- Work with states and territories as equal partners in managing ocean resources and implementing the National Ocean Policy.
- Provide additional resources, including funding and technical assistance, to the states and territories to implement the National Ocean Policy and CMSP.
- Support Reauthorization of the Coastal Zone Management Act and Coral Reef Conservation Act.
- Ensure that the Implementation Plan builds on existing state, regional, and federal partnerships, including the U.S. Coral Reef Task Force.
- Support state, territorial and local efforts to provide critical projections of climate change impacts on coasts and oceans at decision-relevant scales to reduce risks and impacts.
- Support states and territories to assess the vulnerability of coastal and ocean environments and communities to climate change and ocean acidification.
- Support states and territories in managing renewable energy development.
- Enhance ecosystem based management through improved tools including adaptive management and coastal marine spatial planning.
- Acknowledge Public Trust responsibilities of Federal Agencies.

Implementation Plan Actions

The following are comments on selected strategies in the Plan:

Improve permitting – we support the Federal agencies of working together with states and territories to more efficiently coordinate their permitting processes to eliminate unnecessary delays and burdens for applicants, and more effectively protect ocean health.

Provide scientific information to support emerging sustainable uses of resources including for fisheries, renewable energy, aquaculture and biotechnology - we fully support the NOC's initiatives to increase access to data and information to provide new and expanded opportunities for sustainable economic growth in traditional and emerging sectors, including renewable energy, aquaculture and biotechnology.

Locate, control and eradication of invasive species populations. We fully support Federal agencies working together with state and local partners to promote and coordinate actions to locate, monitor, control and where possible, eradicate invasive species populations.

Improve water quality by reducing the impacts of trash, marine debris and sources of excess nutrients, sediments, pollutants, and pathogens. Pollution to streams, rivers, estuaries and coasts is a significant cause of declining ocean and coastal ecosystem health. Corals are particularly vulnerable to pollutants and sedimentation. We look forward to working in partnership with federal agencies to implement conservation and best management practices to reduce rural and urban sources of pollution to improve local water quality and enhance ecosystem services.

Support vulnerable coastal communities in addressing impacts of climate change on infrastructure and economies. We agree with the NOP strategy to strengthen and integrate observations from the National's protected areas, research activities and observing systems into a coordinated network to provide decision-makers with information to reduce risks and increase resilience of ocean and coastal communities. Increased understanding of climate change and ocean acidification impacts will improve vulnerability assessments and effectiveness of adaptation actions to reduce risks and impacts.

Regional ecosystem protection and restoration – We fully support Action 4: to Strengthen interagency collaboration to protect and conserve coral reef ecosystems. Improving coral reef conservation by strengthening interagency coordination will promote a ridge-to-reef or watershed approach to address-land based sources of pollution, and facilitate a more consistent approach to evaluating, assessing and mitigating impacts to coral reef ecosystems. We agree with the initiatives to establish a mechanism for controlling invasive species to help improve water quality and ecosystem services; identifying significant marine areas for science-based protection that balances conservation and human uses; and increased monitoring and data collection to improve the effectiveness of habitat restoration.

CMSP – We look forward to receiving the Handbook for regional CMSP which will assist our regional planning bodies with guidance and information to support the regional planning process. We also look forward to receiving assistance to implement regional CMSP workshops in the Pacific Islands and Caribbean Regions. Our jurisdictions will also actively participate on the Regional Planning Bodies, when they are established.

Name: **Cyndi Karp**

Organization:

Path:

Comment: I have read the Draft National Ocean Policy Implementation Plan. The Plan is missing a very key element. A full fledged commitment to Stop Invasive Species. We must find new ways to control the introduction of Invasive Species from being introduced to the Marine and Fresh Waters. America needs to Lead the World in Invasive Species Prevention, Control and Eradication on the High Priority Invasive Species. Both Fauna and Flora species should be Listed and High, Medium and Low Priorities.

I am very concerned that the reduction of Breeding Stock already introduced is not taken more Seriously. There needs to be more action taken about the problem of invasive species control.

Name: **Craig Bowhay**

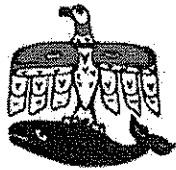
Organization: Northwest Indian Fisheries Commission

Path: http://edit.whitehouse.gov/sites/default/files/webform/draft_nop_imp_plan_comments.pdf

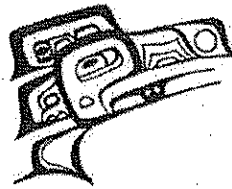
Comment:



Hoh Indian Tribe
2464 Lower Hoh Road
Forks WA 98331



Makah Tribe
P.O. Box 115
Neah Bay, WA 98357



Quileute Tribe
P.O. Box 279
LaPush, WA 98350



Quinault Indian Nation
P.O. Box 189
Taholah, WA 98587

February 27, 2012

Ms. Nancy Sutley
Chair, White House Council on Environmental Quality
722 Jackson Place, NW Washington, DC 20503

RE: Draft National Ocean Policy Implementation Plan

Dear Ms. Sutley,

The Coastal Treaty Tribes (Hoh, Makah, and Quileute Tribes and the Quinault Indian Nation) of western Washington offer the following joint comments on the Draft National Ocean Policy Implementation Plan.

Overall, we are supportive the Obama Administration's effort to develop a National Ocean Policy. We see the benefit of greater coordinated effort and a more holistic approach to the stewardship of our shared ocean resources. We are encouraged by the four basic themes of the Draft Implementation Plan: adoption of an ecosystem-based management approach; acquisition and utilization of best science and data; promotion of efficiency and collaboration; and strengthening of regional efforts.

However, we are deeply troubled by what is not found within the Draft Implementation Plan: acknowledgement of the federal government's treaty trust responsibilities and funding support to enable meaningful tribal participation in the development and implementation of the National Ocean Policy.

Central to the Draft Implementation Plan is the development of a comprehensive ecosystem-based management approach which will entail greater collaboration by all federal agencies. Action 1 of the Ecosystem-based Management Section outlines that the principles, goals and performance measures for this new approach will be developed and adopted within the coming

year (Page 13). While it is within the United States' prerogative to change its management goals and approach, there must be consultation with the affected tribes to ensure that this new approach is compatible with tribal goals and policies.

It concerns us that the National Ocean Council proposes to develop and adopt this ecosystem-based management approach independent of outside input. The Draft Implementation Plan identifies how this approach will be a foundational principle for the future management of the ocean, coasts, and Great Lakes (page 9). However, there is no process identified for soliciting input from any non-federal entities regarding the development of the actual framework, principles and set of goals (page 13-14). The Coastal Treaty Tribes possess treaties with the United States that reserved our hunting and fishing rights. We have co-ownership and share management responsibilities with the United States for the natural resources found within our Usual and Accustomed Areas (U&As) which extend well into federal waters. We expect to be substantively and meaningfully engaged in the development of this approach to ensure that our treaty reserved rights and trust resources are not hindered, diminished, or precluded by this action. The United States has the legal obligation and a profound trust responsibility to protect treaty rights and ensure that tribal access and use of the resources necessary to sustain their cultures, economies, and life ways are maintained in perpetuity. Therefore, we request that this section be amended to acknowledge the federal government's trust obligation and consultation requirements to the tribes.

This same recognition of the federal government's trust obligations and consultation requirements is required within the Coordinate and Support Section of the Draft Implementation Plan. Action 1 of this section speaks to supporting regional priorities and enhancing regional partnerships (page 36). The expressed intent is: *"In implementing this action, Federal agencies will enhance progress in the regions by supporting ROP priorities and by improving coordination among Federal offices in the regions."* The accompanying milestones outline how federal grants and non-monetary support will be focused on the existing Regional Ocean Partnerships (ROPs) and other partnerships (page 37).

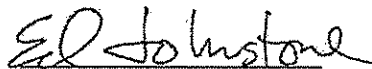
The problem with this approach is that the Coastal Treaty Tribes are not engage with the West Coast ROP, the West Coast Governor's Alliance on Ocean Health. The reason for this is that the Alliance does not have or intend to provide for tribal membership on their Executive Committee. The Alliance's priorities do not reflect tribal priorities nor have they formally sought official tribal input in the development of their priorities or action plans. If this is the sole regional interaction anticipated, then the tribes are being left out of the conversation and process. Therefore, we request that this section be amended to explicitly acknowledge that regional priorities and partnership support must be inclusive of tribes. Because not all existing ROPs provide for tribal membership, Action 1 must be modified to accommodate the establishment of regional tribal partnerships that function as the equivalents to state-led ROPs and afford the same financial support and funding opportunities.

Acknowledgement of the federal government's trust obligation and consultation responsibilities within this document is essential as this Draft Implementation Plan is to serve as

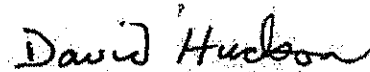
an open book for how and where federal agencies will focus their resources and attention (page 94). Many of the federal agencies now being involved in ocean management decisions may lack experience with dealing with tribal governments and treaty trust obligations. The Draft Implementation Plan should serve to inform all regional federal agencies personnel how this new framework approach is to be inclusive of tribes and the treaty trust obligation that the federal government has to tribes. Furthermore, it should acknowledge that the Coastal Treaty Tribes are co-managers of the ocean environment and retain ownership interest (jointly with the United States) in those areas and resources that they depend on. As such, it is necessary for the federal government not only to consult with potentially affected tribe(s) on policies or regulations being developed. Management and planning within treaty areas (U&As) must be developed jointly among Federal and tribal governments.

We appreciate the recognition that tribes need to be involved and provided a seat at the table for Coastal Marine Spatial Planning (pages 85-92). The National Ocean Council must establish guidelines to govern the Coastal Marine Spatial Planning process so as to ensure that each of the Coastal Treaty Tribes is respectfully engaged. However, this is only one element of the overall effort. The development and implementation of the National Ocean Policy extends well beyond this activity. Acknowledgement of equal tribal participation and management authority should occur throughout the document.

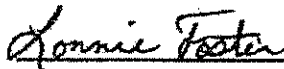
Sincerely,




Ed Johnstone
Quinalt Indian Nation



David Hudson
Hoh Indian Tribe



Lonnie Foster
Quilleute Indian Tribe



Micah McCarty
Makah Indian Tribe

CC: Charles Galbraith, White House Deputy Associate Director, Office of Intergovernmental Affairs
Dee Ann Alexander, DOC Senior Advisor on Native American Affairs, Office of Legislative & Intergovernmental Affairs
Del Laverdure, DOI Principal Deputy Assistant Secretary – Indian Affairs
John Field, Foreign Affairs Officer, U.S. Department of State

Name: **wilton nelson**

Organization:

Path:

Comment:

“While noting the administrative buildup, the plan incorporates inadequate congressional oversight,” commented Tom Ingram, Executive Director of DEMA.

I think DEMA should stay OUT of politics. We get enough without their political rhetoric.

Continue reading on Examiner.com Scuba Diving industry critical of Obama Administration's National Ocean Policy - National scuba diving | Examiner.com
<http://www.examiner.com/scuba-diving-in-national/scuba-diving-industry-critical-of-obama-administration-s-national-ocean-policy#ixzz1odiVvUSL>

Name: **Scott Sheckman**

Organization: Ocean Defenders Alliance

Path:

Comment: Hello Obama Administration

I'll keep it short - please do all you can to ensure our Oceans are as vibrant and healthy as how we found them before the 21st Century began. Like most of the natural world, wildlife of the seas do not generally benefit from human advancement, rather tend to suffer at our hand. Since they live in water and we live in air, the least we can do is respect their world and do our best to find a harmonious balance between smart marine "resource extraction", unpreventable pollution, and "live and let live".

Future generations of Americans & international Humans are already watching what we do today, and history is generally not kind to those who do not head common sense and fight the good fight.

I strongly believe the Obama Administration wants to do the Right Thing by the Oceans territories the world's greatest nation (USA) can effectively manage in the years, decades and centuries ahead with our partners and allies from around the only planet we have.

Sincerely,

Scott Sheckman
Founding Board Director
Ocean Defenders Alliance
www.oceandefenders.org

Name: **Brenda Foxy**

Organization:

Path:

Comment: I think I read and commented on another Ocean Policy draft when Bill Clinton was President. Regrettably, I don't have enough time to keep reading these tomes since I'm not getting paid to read them. After putting more years under my belt, I've concluded that it's almost a waste of time to comment because what really matters, is POLITICS and the human factor will always supercede the nonhuman factors. So, this almost seems like a paper exercise to give government workers something to do.

You can tally my comment as agreeing with what the National Association of Charterboat Operators has submitted.

Thank you.

Name: **Gregor Hodgson**

Organization: Reef Check Foundation

Path:

Comment: It is a major oversight that while a large part of this plan is devoted to applying high tech methods of gathering data, there is no mention of the role of citizen science. From the Florida Keys to Hawaii to the coast of California, citizen-scientists are monitoring population of marine organisms living on coral reefs and rocky reefs. Online databases such as Reef Check's NED system ned/reefcheck.org already make all of this data available to policy-makers and marine managers. The support provided by the federal government to this effort has been almost zero! Given the fiscal constraints now faced, isn't it time the US government begin to support the thousands of volunteers wanting to help better monitor and manage our oceans? It would be sensible to add some text under the Observations heading reviewing the current and future role of citizen science and organizations like Reef Check in the future of ocean education, monitoring and management. Given leverage provided by thousands of trained volunteers, it would be logical to put more funding into citizen science.

Name: **Anne Nelson**

Organization:

Path: http://edit.whitehouse.gov/sites/default/files/webform/noc_comments_031212.pdf

Comment:

March 12, 2012

Ms. Nancy Sutley, Dr. John Holdren, and Members National Ocean Council c/o Council on Environmental Quality
722 Jackson Place, NW
Washington, DC 20503

Re: Comments and Priorities on the Draft National Ocean Policy Implementation Plan

Dear Chairs Sutley and Holdren and National Ocean Council Members,

Thank you for providing opportunity to comment and for your consideration. First off, I would like to commend you on your leadership in this exciting process. It is heartening to see the process driven and underscored by an ecosystem-based management approach. Overall the plan and process outlined will steer us in a positive direction for comprehensive marine and coastal spatial planning.

ECOSYSTEM BASED MANAGEMENT

Comprehensive planning must account for not only economic services derived from the ocean but must fundamentally account for ecosystem services provided by the ocean upon which we are all dependent. The reduction in provision of those fundamental ecosystem services must be factored into the cost of extractive uses such as energy development and production.

INFORM DECISIONS AND IMPROVE UNDERSTANDING

Action 2: Provide scientific information to support emerging sustainable uses of resources including renewable energy, aquaculture, and biotechnology.

The rapidly developing marine renewable energy industry indeed necessitates a thorough understanding of the long-term benefits and impacts to marine systems and species, in addition to benefits for human energy use. Please consider adding an additional action item to fill known data gaps of marine mammal migratory corridors and critical habitat for use in siting marine renewable energy facilities. Potential impacts from noise, entanglement, disruption of migration and foraging areas are but a few deleterious impacts installations of these facilities may incur. We have an opportunity to develop this nascent industry proactively and develop in such a way to robustly consider marine mammals and the food chain they depend upon before any further facilities are sited in US waters. The timing is right to understand finally and definitively where and how endangered and protected species use our oceans in light of EBM and CMSP. One deliverable to add in the action items would be specific guidance relevant to marine mammals for planning for marine renewable energy.

Action 4: Integrate social and natural scientific information into decision-making.

Consider separating natural and social science information into separate action areas. A great more could and should be said here about integrating natural science into decision making as it is the backbone of ecosystem based management and the plan as a whole.

COORDINATE AND SUPPORT

Please consider adding migratory fish and marine mammals into the narrative on shared priorities of ROPs (p. 36.)

REGIONAL ECOSYSTEM AND PROTECTION AND RESTORATION

Action 6: Identify nationally significant marine and Great Lakes natural and cultural areas in need of protection.

This is a key action item in which to add a milestone regarding identifying regionally significant migratory corridors for marine mammals. Consider applying a gap analysis in Oregon, where strong interest in marine renewable energy and large data gaps on federally endangered marine mammal spatial use of Oregon waters could provide ample fodder for this exercise.

Thank you for consideration and extensive work to develop and carry out the National Ocean Policy Implementation Plan. This is indeed an exciting time!

Best regards,
Anne Nelson