

The banner features a background image of ocean waves. The text 'WEST COAST GOVERNORS' AGREEMENT on OCEAN HEALTH' is written in a large, blue, sans-serif font. Below this, 'CALIFORNIA OREGON WASHINGTON' is written in a smaller, white, sans-serif font on a blue horizontal bar.

WEST COAST GOVERNORS' AGREEMENT on OCEAN HEALTH

CALIFORNIA OREGON WASHINGTON

April 29, 2011

National Ocean Council
722 Jackson Place, NW
Washington, DC 20503

RE: National Ocean Council; Development of Strategic Action Plans for the National Policy for the Stewardship of the Ocean, Our Coasts, and the Great Lakes

Dear National Ocean Council representatives:

Thank you for the opportunity for the Executive Committee of the West Coast Governors' Agreement on Ocean Health (WCGA) to respond to the January 24, 2011 request for comments regarding the nine priority objectives for the National Policy for the Stewardship of the Ocean, Our Coasts, and the Great Lakes. We have worked closely with the Coastal States Organization and endorse their comment letters. In addition, we would like to submit the following comments specific to the WCGA.

Introduction

On September 18, 2006, the WCGA was established by the Governors of California, Oregon and Washington as the regional ocean partnership (ROP) to protect and manage the shared ocean and coastal resources and the economies they support along the entire West Coast.

The WCGA seeks to achieve seven broad goals (priorities):

1. Clean coastal waters and beaches
2. Healthy ocean and coastal habitats
3. Effective ecosystem-based management
4. Reduced impacts of offshore development
5. Increased ocean awareness and literacy among the region's citizens
6. Expanded ocean and coastal scientific information, research, and monitoring
7. Sustainable economic development of coastal communities

In 2008, the WCGA Action Plan was released detailing specific and immediate actions that would be undertaken to help achieve these priorities. The WCGA Executive Committee established 10 Action Coordination Teams (ACTs) to coordinate coast-wide implementation of the Action Plan. In 2010, the WCGA received \$500,000 from the National Oceanic and Atmospheric Administration (NOAA) for a competitive grant to implement high priority actions in the 2008 Action Plan and activities in the ACT work plans. The WCGA recently released a Progress Report in April of 2011 outlining its accomplishments achieved to date.

The National Ocean Policy (NOP) identifies the WCGA as the regional ocean governance partnership for the West Coast and one of nine such entities recognized throughout the United States. The WCGA will help implement the goals and purpose of the NOP on the West Coast of the United States. We look forward to working closely with the National Ocean Council (NOC) and the Governance Coordinating Committee to help provide the link between national ocean policy and its application on the ground on the West Coast.

The WCGA would like to offer the following overarching comments that apply to all of the priority areas. These comments are followed with comments on eight of the nine priority areas in the NOP:

Inter-agency Cooperation and Collaboration

Sound management of ocean and coastal resources has been hampered by the fragmentation of jurisdiction and management responsibilities between various federal agencies, often with conflicting mission statements. We commend the Obama Administration for establishing the NOC and developing the NOP as a means to foster federal inter-agency cooperation. The development of these Strategic Action Plans is an invaluable opportunity to coordinate all levels of government and to encourage cooperation toward the common goals of ocean protection and sustainable use.

Complement Existing Efforts

All of the priority objectives in the NOP should build upon and complement existing on-the-ground efforts at the regional, state, and local level. For example, the WCGA is an agreement among the three governors, who operate in partnership with three federal agencies (Department of Commerce through NOAA, the Department of the Interior, and the US Environmental Protection Agency [EPA]). Also, existing authorities and programs, such as the Coastal Zone Management Act (CZMA), with programs in the coastal states, will be valuable partners for implementing the NOP. The work of the NOC and federal government should build on efforts, such as the WCGA, to avoid duplication of efforts, reduce waste of valuable resources and time, and minimize the chance of conflicts between federal and state objectives.

The NOP appears to acknowledge and embrace the differences among the regions and their independent concerns and objectives by allowing these regions to take a lead role in the preparation of on-the-ground actions and important implementation tools, such as coastal and marine spatial plans.

Leverage Resources and Capacity

The WCGA currently operates in the most efficient and effective manner possible by leveraging volunteer participation on its Executive Committee (three states and three federal agencies) and the 10 Action Coordination Teams comprised of volunteers from government agencies (federal, state, local, and tribal), academia, industry, and non-governmental organizations. These collaborations have created opportunities for more efficient and effective action, leveraged funding and resources, and broadened discussions to incorporate more regional perspectives in planning and coordination efforts.

Although we recognize the difficult federal budget situation, stable and long-term financial support and incentives will be necessary for the WCGA to assume additional responsibilities for NOP planning and implementation.

Communication and Stakeholder Involvement

The WCGA continues to engage the public in its efforts to further ocean policy with extensive public input and stakeholder coordination for its action plan. We have held several public forums addressing topics, such as alternative energy development and preparation of our grant proposal to NOAA, to support for marine spatial planning. Our materials are available on our website (www.westcoastoceans.gov), and we have an extensive internet mailing list for outreach.

The WCGA would like to provide the following comments on eight of the nine priorities (we chose not to comment on Objective 8: Changing Conditions in the Arctic):

Objective 1: Ecosystem-Based Management: Adopt ecosystem-based management as a foundational principle for the comprehensive management of the ocean, our coasts, and the Great Lakes.

- *Linking Community Efforts*: Link existing community and monitoring initiatives to avoid duplication and redundancy.
- *Federal Support*: Provide strong technical and financial support to existing regional and state management programs.
- *Existing Policies and Practices*: Incorporate EBM into existing policies, management plans, mapping, permitting, and planning.

The WCGA encourages community-based efforts and decision making that incorporate principles and best practices and consider broader ecosystem and socioeconomic factors. Ecosystem-based management (EBM) is an important tool for advancing academic theory into tangible, real-world outcomes. Clearly articulating the goals, priorities, and the benefits of EBM with improved monitoring and data assessment will allow existing efforts and partnerships to implement effective adaptive management that brings together key stakeholders and authorities to ensure consideration of the entire ecosystem.

The West Coast EBM Network is a partnership of six community-based initiatives focused on successfully implementing EBM along the coasts of Washington, Oregon and California. The WCGA will continue to support linking existing locally driven initiatives to create networks that can share lessons, combine and leverage resources, and empower community-level action and involvement without duplicating efforts and redundancy. Similarly, linking the national Integrated Ocean Observing Systems and other monitoring and data networks will allow for more science-based decision making and adaptive management as we receive new information.

The NOP should continue to endorse and build upon the work of the ROPs and state programs, such as the Coastal Zone Management (CZM) Programs, as a reflection of a long-term commitment to EBM as a priority for policy and management to protect our marine and coastal resources. The federal government needs to continue to provide strong technical and financial support to existing regional and state management programs, which can help implement EBM on the ground. To ensure coordination and broader ecosystem considerations, a formal body can be convened to continue incorporating a wider ecosystem approach into existing policies, management plans, habitat mapping, and project permitting and planning.

Objective 2: Coastal and Marine Spatial Planning: Implement comprehensive, integrated, ecosystem-based coastal and marine spatial planning and management in the United States

- *Build on Existing Efforts*: Avoid undermining existing efforts by utilizing the experience from the states and other organizations and programs, such as the WCGA and CZM Programs.
- *Results-Oriented Messaging with Coastal and Marine Spatial Planning (CMSP) as a Tool*: Identify national goals, such as ensuring clean beaches, improving water quality, maintaining productive and healthy fisheries, and promoting sustainable coastal communities, and then promote CMSP as a planning tool that will help us achieve them.
- *Information Management*: Create an accessible, user-friendly data portal that links existing data, monitoring networks, and mapping products to improve decision making.

The NOP should support regional, state, and local CMSP efforts and build upon existing programs, such as the WCGA and CZM Program. These partnerships and programs can directly contribute to on-the-ground implementation of CMSP. The federal government should avoid actions that could undermine existing efforts and create duplication and the sentiment that this is a top-down approach. The Regional Planning Body (RPB) is an opportunity for all parties to convene as equals to support existing national, regional, and state actions and goals.

The NOP should emphasize a results-oriented set of goals with CMSP as one of the key tools to achieve them. For example, the WCGA views CMSP as a planning tool that will help us achieve the goals of ensuring clean beaches, improving water quality, maintaining productive and healthy fisheries, and promoting sustainable coastal communities. This reframing will help in both political and public engagement. The WCGA supports engaging the public in the CMSP process at regional stakeholder workshops and other public forums.

Absent additional resources and funding, states cannot be expected to fully implement CMSP. In addition, decision making and CMSP should be based on the best available information. Providing immediate and sustained technical assistance for information management provides a strong incentive for state participation and lays the foundation for sound policy and management decisions. Availability of high quality, usable information will be critical to develop each region's CMS plans. The creation of an accessible, user-friendly data portal that links existing data, monitoring networks, and mapping products (i.e., fisheries management, protected areas and national marine sanctuaries, energy siting, state lands leases, etc.) will help the states, regions, and the nation to make more informed decisions for our environment. Use of standardized metrics and data protocols will help to reduce incompatibility between data from different sources and ease the incorporation of new data into this information network.

Objective 3: Inform Decisions and Improve Understanding: Increase knowledge to continually inform and improve management and policy decisions and the capacity to respond to change and challenges. Better educate the public through formal and informal programs about the ocean, our coasts, and the Great Lakes.

- *Integrated Data Networks*: Support the development of integrated data systems to inform decision-making.
- *Public Awareness Campaign*: Launch a national campaign to educate the public about ocean stewardship.

- K-12 Education: Sponsor and fund integration of ocean literacy principles into curriculum.

Access to the best available scientific data is crucial for sound decision making regarding our ocean and coastal resources. The three West Coast states have invested significantly in research and in tools (such as Coastal Atlases) that allow for the integration of spatially explicit data to aid in decision-making. Furthermore, having a citizenry knowledgeable about the importance of the ocean to our collective well-being is critical in gaining public support for efforts to protect and manage these important resources.

As mentioned under Priority Objective 2 for CMSP, the federal government should support state and regional efforts to develop integrated data networks to inform better decision-making by policy officials.

The federal government should launch a nation-wide public awareness campaign to educate the public about the importance of the ocean. The federal government should consider whether the Thank You Ocean campaign in California could be a model for a nation-wide campaign—we propose it is such a model.

Sponsoring and funding integration of National Science Standards and Ocean Literacy Principles, currently being developed by National Research Council and ACHIEVE, into our K-12 curriculum is both a short- and long-term investment in our nation’s future and the stewardship of our ocean and coastal resources.

Objective 4: Coordinate and Support: Better coordinate and support Federal, State, Tribal, local, and regional management of the ocean, our coasts, and the Great Lakes. Improve coordination and integration across the Federal Government and, as appropriate, engage with the international community.

- Build on Existing Partnerships: Coordinate among agencies to build on existing regional partnerships.
- Funding: Provide sufficient funding to advance coordination within individual states or regions.
- Federal Agency Commitment: Make specific and long-term program commitments to implement this new federal ocean policy to achieve the intended policy objectives.
- Involvement of Tribes: Assist states or regions in efforts to involve and coordinate with tribes on a government-to-government basis.

We are pleased that the NOP is focusing on the critical issues of coordination and support at all levels of government. We believe that the WCGA, as well as other partnership organizations, such as the Pacific Fisheries Management Council, the Pacific Coast Collaborative, and the British Columbia/Pacific States Oil Spill Task Force, provide excellent examples of such coordination and support. These efforts all work to coordinate the needs of three states (and, in some cases, British Columbia), federal agencies, and many stakeholders from local governments, academic institutions, industry, and the public. Each state has a federally approved CZM Program, ocean management organizations—such as California’s Ocean Protection Council, the Oregon’s Ocean Policy Advisory Council, Washington’s Puget Sound Partnership and State Ocean Caucus groups—and a variety of important academic, industry, and non-governmental resources from which to draw. Hopefully, we

can build on those existing partnerships as much as possible. Unfortunately, the call for advancing the National Ocean Policy comes at a time when there are significant federal and state budget limitations.

Federal agencies will need to make specific and long-term program and financial commitments to implement this new federal ocean policy to achieve the intended policy objectives through individual states and regions. Although the states have continued to improve engagement and communication with the 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 tribes. It will be important for the federal government to initiate this coordination with tribal nations on a government-to-government basis.

Objective 5: Resiliency and Adaptation to Climate Change and Ocean Acidification: Strengthen resiliency of coastal communities and marine and Great Lakes environments and their abilities to adapt to climate change impacts and ocean acidification.

- *Research and Information:* Support efforts by states to improve understanding of the potential impacts of climate change through efforts such as baseline studies and mapping. Support scientific research on potential impacts of ocean acidification on marine life and food webs as well as to economic, social, and cultural effects on coastal communities. Improve the communication of relevant scientific findings to resource managers, policymakers, and the public.
- *Adaptation and Mitigation Efforts:* Support efforts to create regionally or locally specific plans to mitigate impacts of climate change, including ocean acidification, on coastal communities.

Climate change will likely disproportionately affect coastal areas. The major impacts of climate change will include coastal sea level rise, salt water intrusion, increased ocean temperature, ocean acidification, changes in physical characteristics of marine systems, increased harmful algal blooms, spread of invasive species, habitat loss, species migrations, and changes in dynamics of marine ecosystems. The WCGA addresses climate change as one of two overarching objectives. Currently, we are sponsoring a scientific study by the National Research Council of potential sea level rise along the West Coast. The study would help coastal communities efficiently plan and prepare for the immediate and future effects of rising seas on their local infrastructure and economy. The three states are also conducting comprehensive offshore seafloor mapping in state waters to identify critical areas and to create a baseline for future monitoring.

The uncertainty of the impacts to the ecosystem and key species in response to climate change and the fact that these impacts will vary locally and regionally present major obstacles for decisions makers, resource managers and the public. To help coastal communities address and plan for impacts of climate change, we recommend funding similar efforts to conduct regional studies that provide locally relevant information to assess these impacts over the coming decades and to develop mitigation and adaptation actions for our coastal communities. These efforts should support interagency collaboration and include education, monitoring, and adaptive management.

Objective 6: Regional Ecosystem Protection and Restoration: Establish and implement an integrated ecosystem protection and restoration strategy that is science-based and aligns conservation and restoration goals at the Federal, State, tribal, local, and regional levels.

- *Habitat Conservation*: In coordination with government agencies, tribes, and all stakeholders, develop regional habitat conservation and restoration goals.
- *Hull Fouling*: Support creation of uniform policies across states for vessel biofouling management practices.
- *Oil Spill Prevention, Preparedness, and Response*: Work more collaboratively with states on oil spill response, research, and development, and increase investments in these activities.

The California Current, which flows from southern British Columbia to southern Baja, California, connects and sustains many unique ecosystems off the coasts of California, Oregon, and Washington. These ecosystems contain the kelp, zooplankton, and krill that are the foundation of the food web, and support commercial, recreational, tribal and subsistence harvests. However, West Coast ecosystems are threatened by climate change, habitat loss, water pollution, unsustainable fisheries and invasive species. Many of these impacts have degraded coastal habitats, and in some cases, particularly coastal wetlands, only a fraction these habitats remain today.

The federal government should support the development of regional habitat conservation and restoration goals (regional prioritization of habitat conservation has been initiated through the Joint Ventures along the West Coast). Introduction of invasive species through ballast water has been the focus of most research and policy, but biofouling (aka hull fouling) and trade of live organisms are also serious and largely unmanaged vectors. We recommend that the NOC develop policies and procedures that are uniform across states for ballast water, biofouling and trade of live organisms. Oil spills, as seen in last year's Deepwater Horizon oil spill, can threaten entire ecosystems and coastal communities. The federal government should continue to enhance collaboration with regional programs, e.g., the West Coast Joint Assessment Team, to improve oil spill response, research, and development. Because funding is limited, it is very important for the NOC to build and depend on regional partnerships, such as the WCGA and current programs, to avoid redundancy.

Objective 7: Water Quality and Sustainable Practices on Land: Enhance water quality in the ocean, along our coasts, and in the Great Lakes by promoting and implementing sustainable practices on land.

- *Marine Debris*: Form regional Marine Debris Alliances to better address marine debris issues.
- *Land-based Pollution*: Quantify contributions of land-based pollutants, identify priority habitats, and create better land use planning practices, such as low-impact development and green infrastructure, to mitigate land-based pollution.

Two of the most important issues affecting water quality of coastal oceans are marine debris and land-based pollution. In 2010, the WCGA announced the West Coast Marine Debris Alliance among California, Oregon, Washington, and British Columbia. This alliance has leveraged additional resources and funding through its international engagement with British Columbia. It also will help to establish baselines of marine debris for the West Coast, develop comprehensive strategies to reduce marine debris, as well as provide a process to evaluate success. The alliance intends to produce a detailed strategy for cooperatively addressing marine debris through mechanisms, such as extended

producer responsibility, product stewardship and life-cycle analysis, and waste reduction and recycling programs.

To alleviate pollution from land-based sources, it will be necessary to quantify runoff of pollutants, sediments, and nutrients; identify and protect priority habitat areas, and involve more strategic land use planning measures, such as green infrastructure (GI), low-impact development (LID), and stormwater management that can mitigate effects of polluted runoff on our ocean and coasts. Reduction of pollution into the marine environment should result in the reduction of harmful algal bloom events, dead zones, beach closures and poor water quality advisories, and fish kills.

Without sustained funding resources, coastal water quality programs do not have the resources and technical capacity to prevent the introduction, accelerate the removal, and minimize the impacts of marine debris or to effectively monitor and mitigate for costly polluted runoff events. The federal government should provide incentives that encourage GI and LID. Endorsing existing partnerships involved in water quality and sustainable land practices can provide a solid framework to improve federal cooperation and incorporate additional agencies without undermining current efforts. For example, under the CZM Program and Clean Water Act, NOAA and the US EPA can combine efforts on non-point source pollution.

Objective 9: Ocean, Coastal, and Great Lakes Observations, Mapping and Infrastructure: Strengthen and integrate Federal and non-Federal observing systems, sensors, data collection platforms, data management, and mapping capabilities into a national system and integrate that system into international observation efforts.

- *Regional Mapping:* Support and coordinate among regional ocean observation systems and mapping efforts.

West Coast leaders have long understood the value in sustained ocean observations and mapping efforts. Ocean observation systems exist from the California-Mexico border north into the waters off British Columbia. These systems assist with a variety of important economic and environmental issues, such as safe and efficient marine operations, assessing the effects and trends of climate change, and helping to provide important information for ecosystem-based management and planning. These systems are all part of the US Integrated Ocean Observation System and include the Northwest Association of Networked Ocean Observing Systems (NANOOS) for Oregon and Washington, Central and Northern California Ocean Observing System (CeNCOOS) off central California, Southern California Coastal Observing System (SCCOOS), and Alaska Ocean Observing System (AOOS). We also have a system of sea floor observation systems comprised of cabled seafloor observatories in British Columbia (e.g., Victoria Experimental Network Under the Sea – VENUS), North East Pacific Time-Series Undersea Networked Experiments (NEPTUNE) and the U.S. Ocean Observatory Initiative efforts in Washington, Oregon and California (e.g. Regional Scale Nodes [RSN]), and the Monterey Accelerated Research System (MARS). Finally, the WCGA is committed to mapping the seafloor for all coastal state waters. This mapping has been critical for fisheries management studies, coastal sediment research, tsunami vulnerability assessment, and location of offshore faults.

The WCGA remains committed to the partnerships among the federal government, states, academic institutions, industry and non-governmental entities that are essential to maintaining these systems.

We believe that the ongoing operation and maintenance of these mapping systems as well as advancing these systems needs to be a major NOP goal.

Conclusion

We believe the WCGA can be a valuable partner with the federal government to further shared National Ocean Policy priorities on the West Coast. We join the Coastal States Organization in urging the National Ocean Council, in their comments, to build upon existing and established state and regional partnerships, such as the WCGA, and ensure funding to the states and ROPs that 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 very important national initiative and looks forward to future involvement and participation achieving NOP goals.