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MICHAEL F. EASLEY
GOVERNOR

June 4, 2004

Admiral James D. Watkins USN (Ret.), Chairman
U.S. Commission on Ocean Policy
1120 20th Street, NW
Suite 200 North
Washington, DC 20036

Dear Admiral Watkins:

I am pleased to submit the following comments on behalf of the state of North Carolina in response to the *Preliminary Report of the U.S. Commission on Ocean Policy*. Our state has long been a leader in comprehensive coastal and fisheries policy. We are committed to protecting our coastal and ocean resources as an integral part of North Carolina's economy and culture. The preliminary report underscores the seriousness of the problems facing our oceans, and we are supportive of many of the recommendations calling for swift and focused efforts to address these problems. We applaud the commission's finding that major changes in U.S. ocean and coastal policies are needed and that reform needs to start now. It is within this context that North Carolina offers the following comments.

Reauthorization of CZMA

As a state that has participated in the federal Coastal Zone Management Act (CZMA) program since 1974, we are particularly interested in the reauthorization of the CZMA (Recommendation 9-1). North Carolina's coastal counties have seen unprecedented growth over the past 20 years. While we have increased the scope of our CZMA programs within the state, federal funding has remained stagnant for 10 years. After factoring in inflation, we have actually experienced a reduction in federal dollars for our program. This makes it increasingly difficult for our state to expand on the goals of the national program, implement new initiatives and effectively manage the coastal area as envisioned by the CZMA.

The CZMA should be reauthorized without delay and with adequate funding to achieve the goals of the Act. North Carolina strongly opposes any amendments to CZMA that weaken the federal consistency provisions or the federal-state partnership. We recognize that revisions to the CZMA may be necessary to provide a more efficient and predictable consistency process, but these revisions must not undermine the ability of states to manage and protect coastal resources. The reauthorization amendments should also maintain a focus on federal-state partnerships, while retaining the states' flexibility to implement programs in a manner that recognizes unique ecological, geographical and political circumstances.

North Carolina supports the development of measurable goals and improved program evaluations and agrees with the language calling for a more performance-based management approach (Recommendation 9-1). However, this recommendation should acknowledge the increased costs associated with performance-based management. Consequently, adequate funding and incentives for good performance should be closely linked with this recommendation.

Regional Efforts

North Carolina supports the establishment of a National Ocean Council and Regional Ocean Councils (Recommendations 4-1 and 4-10). A National Ocean Council could best serve as an administrative body ensuring integration of national ocean policies by federal agencies and the regional councils. The National Ocean Council should not serve as policy-making body nor as a body charged with setting priorities for the regional councils. Rather, these priorities should be set at the regional level in coordination with the states.

Coastal Water Pollution

North Carolina is strongly supportive of those recommendations addressing coastal water pollution. Polluted runoff, including stormwater, is the leading cause of North Carolina's water quality problems and is responsible for a significant portion of coastal water quality problems. Our state is focused on reducing runoff pollution through a comprehensive approach to stormwater management as outlined in Recommendation 14-12.

Recommendation 14-11 suggests that local governments require land use planning to consider the cumulative impacts of development on water quality. Our state's Coastal Area Management Act (CAMA) Land Use Planning Program currently requires local governments to make connections between land use and water quality problems. Additional funding would assist local governments with implementation of land use planning policies to address those connections and problems. This recommendation should include additional financial support for the land use planning component of the CZMA.

North Carolina supports watershed collaboration (Recommendation 14-13) as a way to address problems associated with nonpoint source pollution. For example, North Carolina has seen a significant positive impact from the collaboration made possible through the Albemarle-Pamlico National Estuary Program (APNEP). Stakeholders in this watershed work together to identify problems in the region, develop specific actions to address those problems, and create and implement a formal management plan to restore and protect the estuary. We strongly encourage the expansion of such collaborative efforts with sufficient federal funding. As the report indicates, the lack of federal funding and assistance has become a constraint on the effectiveness of the National Estuary Program.

Fisheries

North Carolina strongly supports the report's guiding principle of implementing an ecosystem-based approach to fisheries management, and those recommendations that further this

Admiral Watkins

Page 3

June 4, 2004

approach. North Carolina also supports the emphasis placed on Marine Protected Areas (MPA) as a tool for ecosystem-based management. MPAs have proven effective at maintaining biodiversity, protecting habitat and advancing sustainable fishery management. Specifically, we support the identification of the Regional Ocean Councils as the lead in designing and implementing MPAs in federal waters (Recommendation 6-4). MPAs should be located in areas where they can be enforced and monitored and the expected benefits of MPAs should be measurable before locations are selected.

North Carolina endorses the commission's support for federal initiatives that partner with states in a number of areas, such as improving data collection, identifying critical data needs and enforcement.

Stewardship and Conservation

North Carolina supports sufficient funding for the Coastal and Estuarine Land Conservation Program (CELCP) as called for in Recommendation 11-1. Our state is in the process of developing plans for its 20 coastal counties through One North Carolina Naturally and the development of a statewide conservation plan. Additionally, the North Carolina Coastal Habitat Protection Plans call for the conservation of lands and habitats critical to the maintenance of fisheries. Increased funding for CELCP will advance these efforts that are currently under way at the state level.

A dedicated fund is also needed to support research and conservation efforts for states to assess the environmental impacts of proposed or ongoing development of ocean resources, particularly oil and gas. Consequently, North Carolina supports Recommendation 24-1. We do suggest that coastal states should have more input and control in the federal Outer Continental Shelf leasing program. In addition, funds should be made available for regional studies on the effects of oil and gas exploration activities, including environmental and socioeconomic impact studies on coastal areas.

Science and Education

North Carolina strongly supports the commission's call for strengthened ocean science funding and enhanced ocean education. Lack of adequate federal funding is impeding efforts by researchers, educators and resource managers to understand the complex interrelationships of our coastal and marine resources and to develop better management strategies. Improved policy and information systems are valuable only if the public and elected leaders are able to understand and utilize them.

North Carolina has a long tradition of excellence in the marine sciences, with several of our universities leading the way in the development and management of state and local level programs. Graduate training is critical to preparing teachers and leaders to understand ocean issues and to providing manpower to support broader educational activities, but sustained graduate student support is increasingly difficult to maintain as available research funding

Admiral Watkins
Page 4
June 4, 2004

decreases. Recommendations 8-13 and 8-14 propose positive steps for addressing existing funding shortfalls.

North Carolina also supports the commission's efforts to tie educational activities to many of the existing and planned operational programs in an effort to integrate marine sciences into the main stream of K-12, undergraduate and graduate science studies. North Carolina strongly endorses the recommendations in the report focused on science education funding and program support and agrees with those recommendations calling on Congress to significantly expand its investment in research in this area.

In conclusion, we commend the commission's work. North Carolina appreciates the opportunity to provide comments on the report, and we look forward to working to implement many of the policy actions detailed in the report.

With best regards, I remain

Very truly yours,

A handwritten signature in black ink, appearing to read "Mike Easley". The signature is written in a cursive, flowing style.

Michael F. Easley

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