



**Summary of Public Comments
on the U.S. Commission on Ocean Policy's Preliminary Report
July 22, 2004**

The Commission received approximately 800 comments from the public on its preliminary report. Comments were received from private citizens (including school children), non-governmental organizations, trade associations, governmental and quasi-governmental organizations (e.g., regional fishery management councils), academicians, scientists, and lawyers. The vast majority thanked the Commission for its hard work, praised the report as comprehensive and balanced, and voiced their support for implementation of the recommendations. Due to the number of commenters and their varying interests, the positions taken on many issues ranged widely. This document identifies and summarizes some of the key issues raised and positions taken in the public comments, but is not a comprehensive evaluation of these comments.

- Similar to views expressed by the governors, many commenters emphasized consistent themes: the oceans, coasts and Great Lakes make significant economic contributions to the nation; the health of our coasts and oceans is threatened; there is an immediate need for greater attention and resources to address the activities causing these problems; and transition toward ecosystem-based management is the appropriate approach.
- The comments on the Commission's governance recommendations were generally favorable, with many agreeing that the National Ocean Council is needed to increase the visibility of ocean and coastal issues within the Executive Office of the President and to facilitate the coordination and integration of federal programs and activities. However, others were concerned that these recommendations could result in unnecessary bureaucracy and imply a top-down approach to governance.
- There were a number of comments in support of strengthening NOAA and establishing legislation codifying the mission of the agency. Some advocated legislation establishing a comprehensive national ocean policy to guide the activities of ocean and coastal programs government-wide and the establishment of an independent ocean agency.
- There was general interest in and support for the establishment of regional ocean councils built around the concept of eco-regions. However, there was a difference of opinion about whether their establishment should be mandatory or voluntary and how the activities of existing regional entities, such as the Regional Fishery Management Councils, would fit into this new process.
- There was an acknowledgement of the need for a comprehensive offshore management regime. However, there was not a consensus on how such a regime should be structured, the scope of its management and regulatory authorities, or the role of the various participants in the process. One group of commenters highlighted the need for a management regime for submerged cultural resources located in federal waters.
- While there was general support for the proposed Ocean Policy Trust Fund and increased funding for ocean and coastal activities, many commented that the Fund should not create

incentives for additional offshore development. A few were opposed to the Fund, or capitalization of the Fund from offshore oil and gas revenue.

- There was strong support for moving toward ecosystem-based management and numerous requests to pursue the more rigorous standards associated with the ecosystem-based management principle. While many felt that the Commission's recommendations struck the proper balance in considering environmental, economic and scientific factors, some clearly desired that greater weight be given to environmental factors when evaluating activities that impact marine ecosystems.
- There were numerous statements in support of stronger regulatory and enforcement regimes for the management of water quality and nonpoint source pollution, with others stating that such an approach imposes unfunded mandates and disincentives.
- The largest number of comments dealt with the chapters on living marine resources; Sustainable Fisheries (Chapter 19) and Marine Mammals and Endangered Marine Species (Chapter 20).
 - There was general support for the reform of the fisheries management system, but no overall agreement on the scope or scale of needed changes. Some suggested substantially reducing the management authority granted to the Councils, while others indicated the process was working relatively well and required only minor changes.
 - There was support for expanded, regionally-based cooperative fisheries research programs and requests for greater consideration of the economic impact of the recommendations on fishermen, their families, and their communities.
 - The use of Dedicated Access Privileges (IFQs) as a valid management tool, with appropriate regional flexibility, had general support, as well as some strong opponents.
 - Many suggested increased conservation practices such as curtailing bottom-trawling and reducing levels of bycatch.
 - Many noted the need for greater attention to issues impacting the status of sea turtles and seabirds.
 - A number questioned the proposed refinement of the definition of harassment for marine mammals.
 - Finally, a number of readers highlighted the need for a regime to manage and protect deepwater corals.
- A number of groups stated that stronger language identifying the benefits of and support for Marine Protected Areas (MPAs) was appropriate. Others stated that the establishment of MPAs should be within the purview of the Regional Fishery Management Councils, while some expressed a need for greater consideration of alternative conservation measures to MPAs.
- There was near universal approval for the Commission's call for increased funding of science and research, increased funding for infrastructure and data collection and dissemination, support for the IOOS, and increases in informal and formal education.

In addition to the issues summarized above, there were numerous additional comments on a suite of issues, including cruise ships, climate change, atmospheric deposition, invasive species, bottom-trawling, bycatch, wind energy, coastal development, international ocean policy, seafood safety, and others.

Public comments on the Preliminary Report will be made available on the Commission's website after submission of the final report to Congress and the President.