



MARINE MAMMAL COMMISSION

27 July 2009

The Honorable Nancy Sutley
Chair, Council on Environmental Quality
722 Jackson Place NW
Washington DC 20503

Dear Ms. Sutley:

The Marine Mammal Protection Act was passed in 1972 to maintain the health and stability of marine ecosystems. The Act established the Marine Mammal Commission to oversee and advise federal officials regarding matters affecting the protection and conservation of marine mammals. In meeting its responsibilities, the Commission has become familiar with a range of threats to marine mammals and marine ecosystems. As the Administration develops a new ocean policy, the Commission asks that it consider the thoughts conveyed here.

We depend on the oceans for food, energy, raw materials, trade, health, recreation, and security. The challenge is to reap those benefits without substantially altering the essential character of marine ecosystems. Yet, in a 30 June 2009 letter to you, the Joint Ocean Commission Initiative emphasized—and the Marine Mammal Commission concurs—that the world’s oceans are in crisis. Climate change, the threat foremost in our minds, is causing ocean acidification, sea level rise, storms of increasing severity, loss of polar ice caps, and fundamental changes in ecosystem structure and function. But the introduction into the oceans of contaminants, disease, alien species, noise, and debris; overfishing; harmful algal blooms and dead zones; increasing vessel traffic; adverse effects of oil, gas, and mineral extraction; and ill-managed coastal development also pose serious risks to marine ecosystems.

To address all these factors, including their cumulative impact, our nation’s ocean policy must be comprehensive. To that end, we must understand the oceans’ elements, processes, and capacity to provide their many benefits on a sustainable basis. We also must understand the factors that drive our escalating needs: our values, demographic expansion, consumption-based economy, and growing demands for resources and space. And we must take a hard look at where our course will lead if we maintain our current heading.

Vision

Policies are intended to guide us into the future, and we hope that this policy will begin with a clear vision. Such a vision must extend both seaward and landward of our coasts. It must reflect the soul of our nation and not simply utilitarian economics or political expediency. It must call for restoration where damage has been done and caution where risks of future damage may be unacceptable. It must call for coordination among our federal, state, tribal, and local governments, and it must engage, educate, and inspire our public about the wonders and values of the sea. It must ensure that we sustain the oceans, just as they sustain us.

Principles

The Joint Ocean Commission Initiative set forth several principles for the ocean policy.

Sustainability. The Marine Mammal Commission agrees with this principle. We should take pride in passing to future generations a world as rich in wonder and opportunity as the one we inherited. But the term “sustainability” is mere rhetoric if we fail to monitor our success or failure. Therefore, the policy must call for the development, implementation, and tracking of a comprehensive set of indicators of the health of marine ecosystems.

Ecosystem-based management. The Commission agrees with this principle. We must expand our management strategy to encompass broad tenets of ecosystem management. But our strategy must not be to abandon what are perceived as lesser issues to adopt only a big picture view—we must understand ecosystems at multiple scales and levels. The adage that all meaningful events are local applies as much to ecology as it does to politics. So we must use a broad ecosystem perspective to complement rather than replace a detailed understanding of the oceans.

Ocean-land-atmosphere links. The Commission agrees that we must recognize the links among land, sea, and air, but the links don't end there. Trace almost any major threat to marine ecosystems to its root causes and the path will lead you to the earth's dominant species. If this policy is going to protect the oceans for future generations, then it must compel us to take a hard look at ourselves, our values, and our activities to understand and manage our ties to the land, sea, and air.

Multiple uses. We will continue to use the oceans for multiple purposes. However, our uses must be predicated not just on our needs and demands but also on the oceans' capacity to satisfy them on a sustainable basis. Fisheries managers have struggled to learn this lesson, and the list of overfished stocks is a sharp reminder that our patterns of use can easily exceed the ocean's natural limits. This new policy cannot achieve sustainability if it ignores the fact that the oceans, like the earth itself, are finite in capacity. Zoning for multiple uses is an excellent idea, but only if the zones actually impose necessary constraints.

International leadership. The world's oceans are largely within an international domain, and their management will require international cooperation. The United States should provide leadership, but leadership means more than a willingness to do the right thing only if the international community concurs. Such an approach will not successfully conserve the essential character of marine ecosystems. Leadership requires a willingness to step forward when you do not know if anyone will follow. The new ocean policy must summon our nation's courage to act alone when it is the right thing to do. If not, the oceans will be hostage to international consensus, which may be politically expedient but ecologically disastrous.

To achieve its vision, this ocean policy also must call for the necessary investment of time, energy, and resources. Considerable infrastructure and scientific capacity are needed to understand marine ecosystems at appropriate temporal and spatial scales. Building such infrastructure and capacity will require foresight, patience, and commitment of resources. Without such commitment, even carefully conceived management efforts will fall short.

Finally, the Commission must ask whether we can extract "ocean" issues from all our other socioeconomic activities. Can we create an effective ocean policy in isolation from the many human endeavors that contribute to ocean degradation? We think not. We are not arguing that less attention be given to the oceans but rather that we recognize our myriad, complex connections to the land, air, and sea. What we really need is a sustainable earth policy that integrates all these considerations into a more complete whole. Otherwise, we will merely pit ocean concerns against other socioeconomic demands, and conservation—even of the oceans—rarely fares well against such competition.

Please contact us if we can assist you or the task force in any way.

Sincerely,



Timothy J. Ragen, Ph.D.
Executive Director

Cc: Members, Interagency Oceans Policy Task Force