

Regional Ecosystem Protection and Restoration: Public Comments Received 1/24/2011-4/29/2011

Table of Contents

Comments	2
Index: Attachments and Letters Received Pertaining to Regional Ecosystem Protection and Restoration.....	22
Coastal States Organization	23
Restore America’s Estuaries	27
National Council for Science and the Environment’s 11th National Conference on Science, Policy and the Environment: Our Changing Oceans.....	33
West Coast Governors’ Agreement On Ocean Health	35
Sierra Club	36
Conservation Law Foundation et al.....	38
Index: Attachments and Letters Received Pertaining to Regional Ecosystem Protection and Restoration and Other Strategic Action Plans	48
National Fish Habitat Action Plan.....	49
Clean Ocean Action	52
Coastal Treaty Tribes: Hoh, Makah, and Quileute Tribes and the Quinault Indian Nation	56
Northwest Atlantic Marine Alliance et al.....	60

Name

Captain Mike Willsey

Organization

Wild Water Guide Service, LLC

Which Priority Objective would you like to provide comment on?

Regional Ecosystem Protection and Restoration

What near-term, mid-term, and long-term actions would most effectively help the Nation achieve this policy objective?

Well let's see, if we supported the groups that have been already assigned these tasks and enforced the laws that are already written you wouldn't need to waste my money on another overpaid political blowhard waste of time. The number of aquatic nuisance species in the Great Lakes is directly due to ocean going vessels dumping their bilge water in fresh water river entrances into the USA. The Asian Carp is another commercially introduced specie that supposedly would not harm our fresh water ecosystem. Doing what's right will cost in the form reinventing how product and raw materials gets where they need to go. The Asian Carp will destroy the the largest freshwater watershed on the planet. In Michigan alone there are 1.4 million registered fisherman who spend 4 billion dollars on motels, bait, tackle, resturants, gas, boats, fees and all the other people who work in the sportfishing industry who's lives will be directly affected, including me. I have spent \$100k out of my retirement money that I have set aside for 30 years to pursue my dreams. NO government grants, NO stimules money, NO government backed banks, just raw go get it American hard work. Shut down the Chicago shipping canal, tell the businesses to get on the stick and find other technoligies to ship there goods and kick out the politians dragging this mess down to get a real job instead of wasting my tax dollars. Everyone knows President Obama's campaign got money from Chicago area businesses to keep the Chicago Canal open and business at staus quo. We all know that special interests who have supported the DNC have recieved much favortism from the current White House. It's to bad the same amount of money couldn't be funneled to the organizations already in existance, Sea Grant, USCG, US Fish and Wildlife Service, USDA, etc. Stop the nonsense and get the job done.

What are some of the major obstacles to achieving this objective; are there opportunities this objective can further, including transformative changes in how we address the stewardship of the oceans, coasts, and Great Lakes?

The government wanting federal control over the entire eco system of the country. There are 140+ envasive species in Lake Michigan because the rules already in place were not enforced and the penalties were to light. Reinventing through sematical changing of words and defenitions does not invent a funding solution to support existing laws. Shut down your study, give the money to Sea Grant, the Coast Guard, EPA, Army Corp of Engineers and the states and we'll get the job done without all the gobble d gook.

What milestones and performance measures would be most useful for measuring progress toward achieving this priority objective?

The groups needed to do the work already exist. Fund them and stop funding progressive socialism.

Name

Rhoda Lbre

Organization

Kaua'i Westside Watershed Council

Which Priority Objective would you like to provide comment on?

Regional Ecosystem Protection and Restoration

What near-term, mid-term, and long-term actions would most effectively help the Nation achieve this policy objective?

Objective is for government to adopt already existing regional cultural planning and management that have existed in the cultural region for over 150 years. The descendants of the ancient Hawai'i resources practitioners and gatherers are still in tact and it would be prudent and effective to follow and support their on-going and active efforts to protect the eco-system and food supplies---these cultural areas are subsistence to the native people that still live on the resources and region. State and federal MOU with cultural collaborations are in progress and operating. The community would appreciate technology and tools assistance in completing our marine spatials for endangered native habitat and species security, data gathering, monitoring and enforcement, and maintenance. Our food supply is important to the life of our coastal people as land farms and grocery stores are to the western way of life. KWWC already have eco-system based and community development management plan as well as climate change response, ocean management action plans, and the MEOCZMP (marine, estuary, ocn, coastal zones maangement plan) implemented in 2005---our resoures practics go back over 150 years of native stewardship that equated to "paradise" when the first westerners came to our home...since then it has been abused by foreigners to the point of genocide of our Hawai'i culture. Working with existing groups would be the most respectful and logical avenue to proceed to help stop the piracy and destruction of our food supply, historical sites, and integrity of our native habitat and eco-system.

What are some of the major obstacles to achieving this objective; are there opportunities this objective can further, including transformative changes in how we address the stewardship of the oceans, coasts, and Great Lakes?

Obstacles in achieving would be the private business ventures (pirates and illegal activities that infringe upon cultural practitioners and gatherers, and eco-system with their constant pollution and destruction) undermine cultural community and ignore BMPs with the help of a broken enforcement system (no real management system) that the state and county has encouraged for the past generations of government interferences. The stewardship of these sensitive food nurseries and supplies are cultural to which the coastal native people have practiced and the pirates and illegal activities persist due to corrupt officials with conflicting interests and private ventures hat have breached permit and license agreements, and no collaboration with regional native community. We need to redesignate areas to properly give jurisdiction, funding, and support to community stewardship so as to protect our historical food supplies, native habitat, coastal culture, unique eco-system, and historically significant sites.

What milestones and performance measures would be most useful for measuring progress toward achieving this priority objective?

Milestones would include the regional cultural evaluation reports that will be given every week and an annual meeting and conference to educate and measure the achievements of the membership and region comprehensively and effectively. It worked in the ancient days and it can work today once we remove the destructive entities that continue to invade our habitat and sell off things of which do not belong to them (foreigners and commercial pirates). We can only achieve our priority objective through cultural stewardship that already exists in the area.

Anything other than that would displacement of cultural people practices and gathering rights, further destruction of native habitat and species, and genocide for the people of Aloha.

Name

Michael Helmholtz

Organization

FMLA FLA Marine Life As.

Which Priority Objective would you like to provide comment on?

Regional Ecosystem Protection and Restoration

What near-term, mid-term, and long-term actions would most effectively help the Nation achieve this policy objective?

Stop any Oil rigs from being able to drill for Oil and keep Big oil from spilling any more oil in Florida's offshore waters.No amount of money is worth the danger to My and millions of others lifestyles here in Florida.I have had my living stopped for one oil rig in the offshore waters of a state that I do not even live in and I do not want it to get any closer to my area no matter the income of labor to drill these rigs in our waters it is not worth it.Give it up and keep them out of Florida.I do not see the need and now we have felt the impact first hand.Restoration needs to be done in the North Florida offshore water Coral reefs have been exposed to oil and nobody is doing any deep sea repair to them.I am ready to help your cause and will take this matter in my hands and help restore the deep sea coral ecosystem and protect and help in the restoration of this fragile Marine Ecosystem.Florida Marine life Diver #1363.Member of FMLA researcher of The consequences of a noisy Environment on animal welfare. DEPT of Fisheries and Aquatic Sciences University of Florida 352 597 7406.

What are some of the major obstacles to achieving this objective; are there opportunities this objective can further, including transformative changes in how we address the stewardship of the oceans, coasts, and Great Lakes?

Deep Sea Ecosystems are hard to research due to the depth of the water.You must use experts like myself who has been in the deep offshore waters making a living for many years.

What milestones and performance measures would be most useful for measuring progress toward achieving this priority objective?

Underwater before photos. which I have in the Florida Law enforcement Booklet from before the oil spill of last year. Now send out a Team to photo the animals again and compare the photos.

Name

Nina Hemphill

Organization

Trinity River Restoration Program

Which Priority Objective would you like to provide comment on?

Regional Ecosystem Protection and Restoration

What near-term, mid-term, and long-term actions would most effectively help the Nation achieve this policy objective?

The Regional Ecosystem Protection and Restoration Priority Objective (Objective 6) aligns very well with the objectives and ongoing work of the National Fish Habitat Action Plan (NFHAP). The objective is to 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. This priority objective aims to address interim and longer term goals and mechanisms to facilitate collaboration among stakeholders to implement projects, an exact parallel to NFHAP. NFHAP as a state-led partnership between state, federal, private, and NGO entities.

What are some of the major obstacles to achieving this objective; are there opportunities this objective can further, including transformative changes in how we address the stewardship of the oceans, coasts, and Great Lakes?

Regional, state, tribal and local differences in needs for fisheries lead to obstacles in coming up with an national 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.

What milestones and performance measures would be most useful for measuring progress toward achieving this priority objective?

Name

Deborah Lucas

Organization

NOAA NMFS

Which Priority Objective would you like to provide comment on?

Regional Ecosystem Protection and Restoration

What near-term, mid-term, and long-term actions would most effectively help the Nation achieve this policy objective?

First and foremost, our Nation needs to be informed of what the states'-led agencies intend to do to reach their goals of restoration of the Gulf and Gulf coasts to their former beauty and usefulness.

What are some of the major obstacles to achieving this objective; are there opportunities this objective can further, including transformative changes in how we address the stewardship of the oceans, coasts, and Great Lakes?

Some of the major obstacles of one is funding, two is critics of the policy and three is the knowledgeable manpower to do what needs to be done. The opportunities that would present this in a positive way, are the jobs that could be created, and we could show other Nations how we have retored the Gulf and the ocean to its former glory and what to do. We could lead by example and be future stewards of our oceans, coasts and the Great Lakes.

What milestones and performance measures would be most useful for measuring progress toward achieving this priority objective?

Milestones and performance measures that would be useful towards marking our progress to our objectives would be accountability and heightened awareness around us of what is happening.

Name

Anna Schroeder

Organization**Which Priority Objective would you like to provide comment on?**

Regional Ecosystem Protection and Restoration

What near-term, mid-term, and long-term actions would most effectively help the Nation achieve this policy objective?

Sea turtles are dying in the gulf in record numbers and need near term help more than ever on year after the BP gulf spill. Adopt the objectives of The Sea Turtle Restoration Project, including the creation of fishing and harmful activity free sea zones so turtles can have a much more successful breeding year.

What are some of the major obstacles to achieving this objective; are there opportunities this objective can further, including transformative changes in how we address the stewardship of the oceans, coasts, and Great Lakes?

What? Corporations own the government. Support fishers and local gulf economies while ceasing to exploit the oceans mercilessly for food and oil. The opportunity is to protect the glory of creation, to protect what is loved. Where does the money come from? How about BP?? They should be held responsible.

What milestones and performance measures would be most useful for measuring progress toward achieving this priority objective?

Turtle numbers.

Name

Robert Konigsfeld

Organization

Montana State University

Which Priority Objective would you like to provide comment on?

Regional Ecosystem Protection and Restoration

What near-term, mid-term, and long-term actions would most effectively help the Nation achieve this policy objective?

Some of the near-term actions should be to successfully plan and place more protected areas where we have seen and/or expect loss of population or biodiversity and create area-specific regulations in order to restore, protect, and benefit the marine-species in the regional ecosystem. The people who have financially relied on the area that negatively affected the area (commercial fisherman, companies polluting waste, poachers etc.) need to be disqualified from making decisions and the catch-and-release sport-fisherman needs to be considered as a valuable asset. These areas and the area's regulations need to be chosen based on effective and qualified science/research from scientists extremely familiar with the particular region's ecosystem. A mid-term action should be to strictly enforce regulations and boundaries of the areas. We all know how beneficial these protected areas could be but without severe and likely punishment of violating the area's regulation, we might not see protection and restoration in the area. A long-term action that would help the Nation achieve this policy objective is to keep the public informed on the benefits of protected areas and inform people (especially younger generations) of the role that the marine species as well as the ocean itself plays into our life. Sylvia Earle (oceanographer who has been called a living legend by congress as well as a Hero for the Planet) stated this in her TED prize acceptance speech, with knowing comes caring and with caring comes hope. We can have hope for the protection and restoration of regional ecosystems but knowledge must come first.

What are some of the major obstacles to achieving this objective; are there opportunities this objective can further, including transformative changes in how we address the stewardship of the oceans, coasts, and Great Lakes?

It is obvious that the financial cost is the major obstacle in this objective. Planning, enforcing, and informing all take large amounts of money. Although this objective would have a large financial responsibility it is important to understand the opportunities this objective can further. The United States needs to recognize the value of the sportsman as well. A typical new-age sportsman is extremely passionate towards his/her hobby and is in favor of the sustaining of their targeted species. Millions and millions of dollars are spent every year on sport fishing equipment, guides, and fees. Many sport fishermen (including myself) are all in favor of catch-and-release fishing. Money from this huge business and hobby can be used more effectively to benefit the economy and provide protected areas where only the sport fishermen can catch-and-release but the commercial fisherman cannot deplete. Most importantly we might be able to change this perception of the ocean as a food source and make the ocean a source of enjoyment, where people and species both benefit from these protected areas. With books and videos such as End of the Line and Addicted to Plastic as well as scientists like Sylvia Earle and Ted Palumbi, we can see a reoccurring message about how the ocean does in fact affect humans everywhere in the entire world. If the United States could show examples of how protected areas can be beneficial to the environment, the marine species surrounding, and the economy then we might see a change on a global level.

What milestones and performance measures would be most useful for measuring progress toward achieving this priority objective?

Sylvia Earle states that 12% of the world's land is now protected and only 0.8% of the world's ocean is protected. We can see here in America the benefits of areas such as Yellowstone National Park and Yosemite National Park. We would mainly want to measure progress by simply studying the overall biodiversity levels and marine species' populations in each regional ecosystem. Another simple way to measure progress is by the total amount of area protected from commercial fishing, polluting, and poaching in the oceans but available for enjoyment of people on a regional level. An important milestone would be to see a positive economical effect that a (sportsman-friendly) protected area has on the region's local businesses and people. The most important long-term milestone that United States should want to see is a global trend of establishing regional ecosystem protection and restoration areas.

Name

Alexander Rosenberg

Organization**Which Priority Objective would you like to provide comment on?**

Regional Ecosystem Protection and Restoration

What near-term, mid-term, and long-term actions would most effectively help the Nation achieve this policy objective?

well, as far as near term actions, i think we need to spread awareness about what exactly is happening to our coastlines. Many people don't realize that their actions/decisions may significantly affect regional ecosystems. For mid term actions i think we need to focus all of our resources and money on protecting the areas that haven't already been destroyed. Instead of trying to restore the Gulf and the Chesapeake Bay, even before the oil spill in the gulf last year there were huge algal blooms from fertilizer runoff. My best suggestion for long term actions is to create marine protected areas all around the United States. Protected areas that are actually patrolled and policed; it would not only create quite a few jobs, but it would preserve the natural ecosystems that we have left. The fisheries are going to take a hit, and fishermen wont be happy but without some sort of marine sanctuary on the coast of every state there wont be any fish to catch anyway.

What are some of the major obstacles to achieving this objective; are there opportunities this objective can further, including transformative changes in how we address the stewardship of the oceans, coasts, and Great Lakes?

One of the major obstacles facing our regional marine ecosystems is invasive species. Brought over from foreign countries, some of these species thrive and have significant impact on the local fish species. The whole way that we look at preserving the ocean needs to change, right now people are thinking, wow, there aren't nearly as many fish here as there were 10 years ago, right now at least there are still fish, in another 10 years, who knows. we need to look at it from the bigger picture; like how will the human race exist without the presence of marine life. we need to spread the word, spread knowledge about what is happening right now off of our very own coastlines. Humans everywhere need healthy oceans and there is no avoiding that.

What milestones and performance measures would be most useful for measuring progress toward achieving this priority objective?

The only performance measures i can think of for measuring progress would be the percentage of US marine protected areas. if that percentage begins to go up due to increased awareness, and motivation to set up sanctuaries we may be able to achieve our objective, which is to ultimately preserve what precious resources we have left, and to protect those that have been damaged from being further abused. the biggest milestone we face is the commercial fisheries; they are not going to go quietly. right now the only fishery in the world that is explicitly regulated is in Alaska, and i have to say, they do a good job. if we could enforce the kinds of regulations that they do in Alaska across most of the US then the call for marine protected areas wouldn't be as strong as it is now. right now about 36 percent of US marine waters are protected, i think that's simply unacceptable. it should be on the higher side of 50 percent. I hope that in this generation things will change, our civilization simply cant sustain itself without marine life. I would hate to see my kids swimming in an ocean with hardly any life.

Name

Adam Pohl

Organization**Which Priority Objective would you like to provide comment on?**

Regional Ecosystem Protection and Restoration

What near-term, mid-term, and long-term actions would most effectively help the Nation achieve this policy objective?

In the case of regional ecosystem protection and restoration, there are several broad goals that must be accomplished if progress is to be made in maintaining healthy ocean environments. An immediate consolidation of the coordinating bodies based on region is essential to all time goals in this project, and as the recommendations have stated, those particular agencies would be conglomerations of the specific needs and interests of those states and territories. In the short term, it is vital that new national sanctions be placed upon overfishing in all sectors of the country, given the interconnectedness of ocean systems moves impacts to all areas based on the actions of one. Despite efforts and successes in regulating fishing, many concerns still exist regarding both intentional and bycatch biomass that is removed and killed in the ocean each year. The education of those who are involved in commercial fishing is also important in regulating these practices. In the wake of the oil spill in the Gulf of Mexico, it should be a central goal of the area and the country to focus on repairing what damage it can as a precedent for potential future issues such as this. Additionally, the amount of wear on barrier islands and wetlands that occurs on the gulf coast as a result of development and water use must be reversed immediately, and efforts begun to keep what barrier islands still exist, and work to restore those that have been damaged. It is in the interest of the coastline and the ocean ecosystem as a whole that all shorelines are kept as buffer zones and natural habitats between human development and ocean. A substantial tax on all fish and fish imports seems to be a potentially effective means of providing incentive for future digression on the part of consumers as to the value of the fish they eat in relation to ecosystems. The need to curtail dumping of sewage and industrial chemicals into the oceans is immediate. From the point of both industry and the general public, the health of these ecosystems is vital to the wellbeing of the nation, and mandatory treatment and containment restrictions must be mandated immediately if the damage is to be minimized. Adding upon these suggestions, some of the midterm goals that must be maintained involve making sure that those threatened populations and ecosystems that would be protected and rehabilitated must have regained a flourishing status before any sort of human intervention or harvest would be allowed, and in that allotment, only in the most sustainable increments and practices. Furthermore, as the Interagency Ocean Policy Task Force name implies, the dialogue between all concerned parties (including interested citizens) would need to be maintained as a method for fostering participation and policy consensus. A move towards allowing only small scale fishing operations within the united states and placing a limit on net size and hole size has already been shown to be effective in lessening exploitation of delicate fisheries, and this has additionally benefited all because it makes all fishing industries more viable and competitive for quality products. In the very long term, a quota for protected areas would need to be implemented that gave strict limits on what could be done inland and on coasts and oceans in relation to fishing, petrochemical drilling, and other industrial actions. In both short and medium term, standards for reasonable safety to humans and wildlife in ocean environments would be worked towards, with the eventual goal being the preservation of a majority of coastline in the United States. A substantial recovery of fisheries would need to be seen for any resumption of commercial fishing, with heavy regulation on boat size and net size.

What are some of the major obstacles to achieving this objective; are there opportunities this objective can further, including transformative changes in how we address the stewardship of the oceans, coasts, and Great Lakes?

Some of the major obstacles of these regulations are that the fishing and oil industries have a disproportionately large claim on the policy decisions that affect the protection of regional ecosystems within U.S. control.

Additionally, garnering public engagement outside those with a vested interest in directly connected industries appears to be difficult, given that the many of those who participated in the public forums on the subject saw the recommendations as too focused on stewardship, and not enough on distinguishing between types of use in appropriately specific language. It appears that some public faith is based solely on full scientific understanding of the implications of ocean use, and that it is more difficult for action to be taken if an area is not fully planned out. Establishing permanent dialogue venues between citizens and administrators would make a better connection and sense of personal influence for those who wish to have a say in what goes on within these environments. It is vital to the entire cause that education be central in the curriculum of regional preservation and rehabilitation of ocean systems and the great lakes, and the establishment of more comprehensive programs in both public and private sectors to provide a clear picture of what is at stake is important to fostering a sense of personal advocacy and stewardship for those who may not have that opportunity otherwise. It is well acknowledged that each sector of coastline is vastly different in needs and characteristic, so regional programs could be tailored to specific ecosystems and issues that are present in that area.

What milestones and performance measures would be most useful for measuring progress toward achieving this priority objective?

The objectives by which some success in the matter could be concluded include a large manner of restoration and preservation initiatives. The complete eradication of a problem invasive species by ecologically sound means would be a good example of an empirical success for the overall objective. The successful completion of the Gulf Oil Spill cleanup or the great lakes restoration initiative could be counted as successes within this criteria as well. The reversal of habitat loss in threatened coastal areas would be a large marker within this broader goal as well. An integrated program establishing more open water marine protected areas and a sustainable cap on fishing within U.S. control would show that collaboration was working between agencies and private interests. Finally, an easy indication of progress within this policy would be an observed rebound of depleted fish populations to original or near-original levels as they were before the commercial fishing industry began.

Name

James David

Organization

St. Lucie County

Which Priority Objective would you like to provide comment on?

Regional Ecosystem Protection and Restoration

What near-term, mid-term, and long-term actions would most effectively help the Nation achieve this policy objective?

First, control Non-point Source discharge in order to protect water quality in coastal water bodies serving as nurseries for marine ecosystems; allocate funds for feasibility initiatives studying the re-use of non-point source runoff, since only with recovery and re-use is there sufficient funding available to maintain recovery facilities (i.e. they can pay for themselves once constructed). Second, strongly support continued collection of FWS surcharges on marine activities that are used to purchase and restore coastal wetlands. Third, encourage NSF to participate in regional and national wetland and nearshore restoration and management studies in order to obtain funding for and better science results in these areas of study.

What are some of the major obstacles to achieving this objective; are there opportunities this objective can further, including transformative changes in how we address the stewardship of the oceans, coasts, and Great Lakes?

Currently we are losing the battle to protect and manage our resources because we are no longer effectively teaching or communicating in the market place. This has to change if we are going to go beyond "We can't, but let's say we did".

What milestones and performance measures would be most useful for measuring progress toward achieving this priority objective?

Locally we are losing small wetlands because of lack of protection for them, and although we have opportunities to develop protective infrastructures that provide multiple purposes and are therefore sustainable, there is no leadership locally or regionally on these issues. Your first non-point source water diversion and re-use self-funding facility would be a nice instructive first objective for non-point source reduction. Retention of FWS funding for wetland restoration in Florida would be a second. NSF participation in wetland and nearshore hardbottom restoration would be very helpful, and inclusion of NSF might raise the educational awareness of these areas.

Name

Michael De Luca

Organization

National estuarine Research Reserve Association

Which Priority Objective would you like to provide comment on?

Regional Ecosystem Protection and Restoration

What near-term, mid-term, and long-term actions would most effectively help the Nation achieve this policy objective?

1. Near-term actions

The National Estuarine Research Reserve System is producing Land Use/Land Change maps at each Reserve site. As these reserve sites are situated in coastal habitats, changes in the landscape would have a direct effect on the near shore environment. These maps will be revisited at set intervals to evaluate the percent change in habitat cover.

Conduct targeted restoration projects that would enhance the functioning and preservation of coastal resources, such as wetlands.

2. Mid-term actions

Mid term to long term : The National Estuarine Research Reserve System is working for all reserve sites to function as sentinel sites. These sentinel sites evaluate emergent wetlands vegetation, submerged aquatic vegetation, sediment deposition or erosion of the marsh surface, water quality and water level. These efforts provide long term consistent monitoring through a network of reserves nationwide. This allows one to understand changes on a national level where appropriate comparison can be made.

Land acquisition should be an important consideration of forming the NOP. Preservation of critical area is paramount as we continue to develop and strain our coastal habitats. The ability to purchase and set aside land for conservation and preservation should continue to the fullest extent possible. Supporting programs such as the National Estuarine Research Reserve System's Construction and Acquisition program and the Coastal and Estuarine Land Conservation Program (CELCP) would ensure we have the ability to take advantage of opportunities that arise.

These plans should be developed by considering the priorities and land acquisition plans of other local and regional organizations; so that you purchase land strategically.

Develop maps of priority lands for acquisition within the coastal zone. These will be developed by coordinating with NGOs, state-federal organizations at the local and regional level. These maps should consider sea level rise, along with other prioritization criteria.

Long-term actions

Restoration opportunities abound in our coastal systems as these areas have been populated and exploited for a many years. Restoration must make sense and in difficult economic times provide the most bang for the buck. Projects should target key / sensitive areas where we achieve the greatest restored area on a habitat wide scale. In some cases it might make more sense to put funds towards preservation instead of funds going towards active restoration.

We should give emphasis to projects that restore the natural hydrological regime. Many wetlands suffer stagnation or nutrient and sediment deprivation because of altered hydrological systems. Improvements could include increasing culverts, elevating roads on pilings and removing water control structures where the benefit outweighs the harm.

Some examples of mid and long terms restoration we should consider

- ØØ Dam removal to restore natural water flow and fish migration; where practical
- ØØ Reduction in impervious surfaces especially in new development
- ØØ Consider sea level rise / coastal flooding for zoning and planning

Emphasize the importance of better planning to minimize continued development in the coastal zone, which will eventually help with the protection of coastal ecosystems. Wetlands will benefit from the reduction of nutrient and metal contamination, minimization of hydrological alterations, and the availability of near upland for wetland migration; all of these being impacted by uncontrolled development.

- ØØ Strengthen critical area regulations in those states that have them develop plans for those states that do not
- ØØ Use of living shoreline over hardened structures
- ØØ Reduction in nutrients loads coming off the land

The nutrient load coming from land based sources is a major contributor to eutrophication and hypoxia in the coastal environment. Regulatory efforts could provide some relief to this issue

- ØØ Invest in alternate energy sources

Investment in alternative energy technology would have an enormous impact on the near shore environment. If we can reduce our dependency on fossil fuels we can expect to see less nitrogen deposition in waters from atmospheric sources, reduction of green house gas emissions and reductions in toxic compounds and elements that find their way into our ocean environment. This has far reaching for the health of ecosystems and human health as well.

- ØØ Test restoration techniques and BMPs and evaluate their success so that money and time is only invested on the things that work.

In the near, mid, and long-term actions is also important to note that monitoring and research needs to continue so that restoration and protection plans are developed and implemented based on best available science.

What are some of the major obstacles to achieving this objective; are there opportunities this objective can further, including transformative changes in how we address the stewardship of the oceans, coasts, and Great Lakes?

Change is difficult especially when it affects people's lifestyle and pocketbook. Finding opportunities that politicians and the public can get behind would be one challenge. Disinformation from entities that have diametrically opposed views and getting people to move outside their comfort zone would be another challenge. You need people to believe that change is necessary and they must speak up before you can expect to get funding for such programs.

Other obstacles could include

- ØØ lack of money
- ØØ lack of personnel to do the work

- Øð difficulty of coordinating with all interested parties in a particular issue (which is also time consuming)
- Øð barriers due to political and economic interests; which go from the local to the regional to the national level
- Øð existing policies and regulations or the lack of these that limit implementation

Transformative opportunities

Use restoration as an education and stewardship tool. Involving the public and communities in restoration projects and/or monitoring efforts.

What milestones and performance measures would be most useful for measuring progress toward achieving this priority objective?

Any improvement in coastal water quality within the suite of variables that are commonly tested for would be a great performance measure. Using reductions in those things that cause our water quality to decline is only half the story and doesn't inform our final goal. While we need to reduce nutrient loading and pollution to our coastal waters these efforts need to be illustrated in improved water quality not just a graph that shows a reduction in factor X.

Seeing a reduction in health advisories concerning how much seafood one should consume from a particular water body would be a great performance measure.

A performance measure could be a certain amount of acres of land protected for different habitat types; as well as number of acres of resources restored we are already doing this within the NERRS.

Name

Glen Bupp

Organization

Which Priority Objective would you like to provide comment on?

Regional Ecosystem Protection and Restoration

What near-term, mid-term, and long-term actions would most effectively help the Nation achieve this policy objective?

What are some of the major obstacles to achieving this objective; are there opportunities this objective can further, including transformative changes in how we address the stewardship of the oceans, coasts, and Great Lakes?

What milestones and performance measures would be most useful for measuring progress toward achieving this priority objective?

-The first milestone will be an increasing trend in public land ownership which is set aside for ecosystem protection. This trend will start with the first acquisition of land for this purpose. The steeper the trend line for all 50 states, the greater the

Name

George Kuper

Organization

Council of Great Lakes Industries

Which Priority Objective would you like to provide comment on?

Regional Ecosystem Protection and Restoration

What near-term, mid-term, and long-term actions would most effectively help the Nation achieve this policy objective?

In the near-term, the National Ocean Council should limit its activities to bringing together the respective agencies already engaged in spatial planning, natural resource protection and management, and ecosystem restoration. The Council's primary mission should be to seek enhanced coordination -- including the sharing of Federal resources and assets -- between these agencies. Within the immediate mid-term, the combined Federal coalition should establish solid links with State resource management and protection agencies as well as regional/local stakeholders. The roll of the Council must be defined as supporting partnerships among local ecosystem protection and restoration agencies that are currently tasked with carrying out protection and restoration activities. Long-term support of these Regionally focused and Regionally directed planning, protection and restoration vehicles must be maintained in the long-term.

What are some of the major obstacles to achieving this objective; are there opportunities this objective can further, including transformative changes in how we address the stewardship of the oceans, coasts, and Great Lakes?

The National Ocean Council has the opportunity to serve a leadership role in the long needed task of breaking down silos between the many Federal agencies and programs that currently seek to individually pursue stewardship roles for oceans, coasts and Great Lakes.

What milestones and performance measures would be most useful for measuring progress toward achieving this priority objective?

Evaluation of specific coastal spatial planning needs, with respect to the Regional activities and functions already in place, is necessary before going forward with new Federally-directed planning exercises.

Attachment:

Attachment included in another document: "**Comments on All 9 Strategic Action Plans:** Council of Great Lakes Industries." Found on page 34 of Comments on All 9 Strategic Action Plans.

Name

Peter Saundry

Organization

National Council for Science and the Environment

Which Priority Objective would you like to provide comment on?

Regional Ecosystem Protection and Restoration

What near-term, mid-term, and long-term actions would most effectively help the Nation achieve this policy objective?

To help 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, the Federal Government and its agencies should:

- A. Develop new strategies to connect federal programs to local communities need for scientific and practical knowledge to apply to planning and management of shoreline changes including natural, social and economic shifts.
- B. Emphasize the importance of regional approaches (such as Port Authorities in the U.S.A) to climate change adaptation solutions both within and outside the U.S.
- C. Set a goal of at least 10 percent of U.S. waters being designated as no take zones.
- D. Strengthen ocean resiliency through Marine Protected Areas (MPAs)
- E. Explore the creation of a legal mechanism for the designation, management, and enforcement of high seas Marine Protected Areas (MPAs) and MPA networks.

What are some of the major obstacles to achieving this objective; are there opportunities this objective can further, including transformative changes in how we address the stewardship of the oceans, coasts, and Great Lakes?**What milestones and performance measures would be most useful for measuring progress toward achieving this priority objective?**

Attachment: Attachment included in index: “National Council for Science and the Environment’s 11th National Conference on Science, Policy and the Environment: Our Changing Oceans.” Found on page 33 of document.

Name

Kat Haber

Organization

WILD Foundation

Which Priority Objective would you like to provide comment on?

Regional Ecosystem Protection and Restoration

What near-term, mid-term, and long-term actions would most effectively help the Nation achieve this policy objective?

No dilling in the Beaufort and Chuchki Seas for oil.

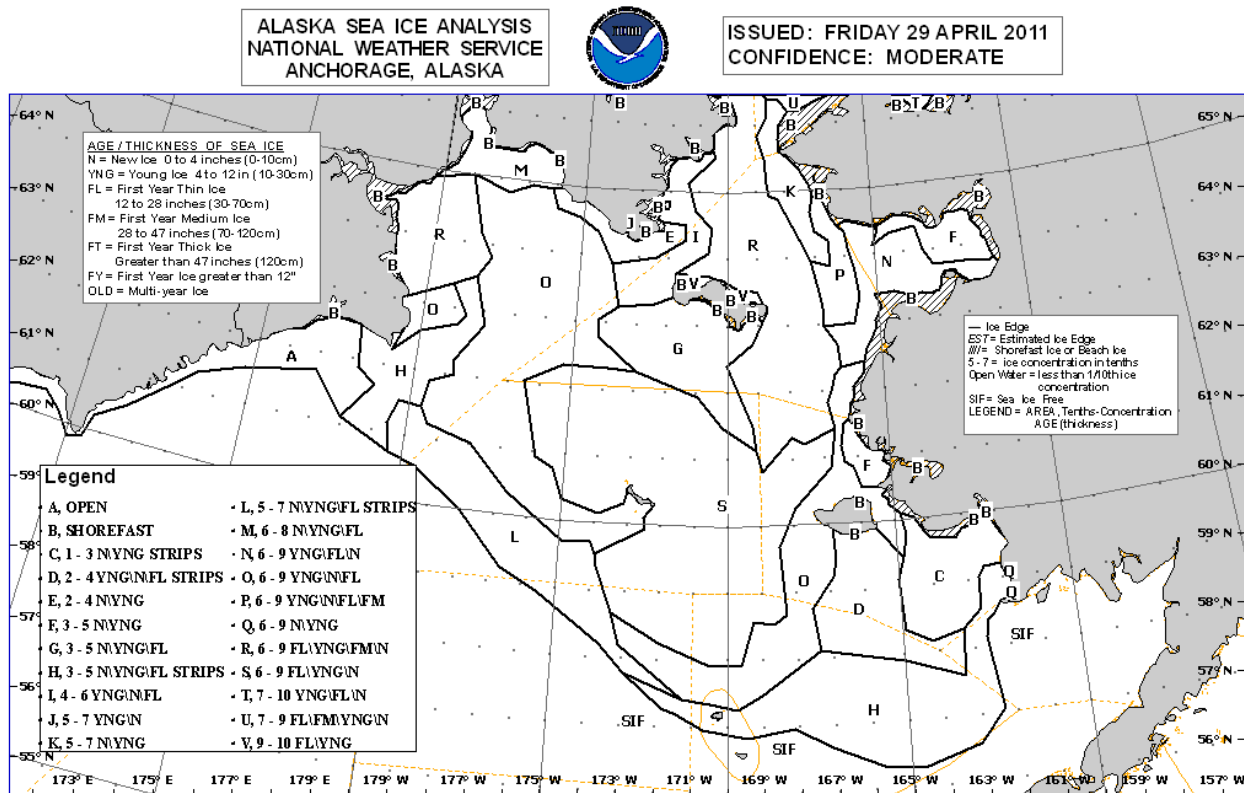
What are some of the major obstacles to achieving this objective; are there opportunities this objective can further, including transformative changes in how we address the stewardship of the oceans, coasts, and Great Lakes?

GREED.

What milestones and performance measures would be most useful for measuring progress toward achieving this priority objective?

No rigs, laws, sand bridges, tax incentives-ever.

Attachment:



Index:
Attachments to Comments
And Letters Received
Pertaining to Regional Ecosystem Protection
and Restoration



Coastal States Organization
444 N Capitol St NW, Suite 322
Washington, DC 20001
202-508-3860
www.coastalstates.org

April 28, 2011

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: CSO Recommendations on *Objective 6: Regional Ecosystem Protection and Restoration*

Dear Chairs Sutley and Holdren, National Ocean Council Members:

On behalf of the Coastal States Organization (CSO), we offer the following recommendations to the National Ocean Council (NOC) for use in developing a Strategic Action Plan for *Objective 6: Regional Ecosystem Protection and Restoration*. Since 1970, CSO has represented the interests of the Governors of the nation's thirty-five coastal states and territories, including the Great Lakes states, on issues relating to the sound management and development of coastal and ocean resources. CSO applauds the *Final Recommendations of the Interagency Ocean Policy Task Force* and the Council's Strategic Action Plan efforts as they represent the evolution of the nation's management of ocean and coastal resources in a balanced approach. With respect to this objective, CSO's recommendations are focused on mechanisms to facilitate enhanced collaboration and the protection and restoration of essential coastal habitats.

CSO recommends that the NOC acknowledge the following recommendations and develop supporting actions as part of the Action Plan.

1. Build upon the Efforts of Regional Partnerships

CSO recommends that the Action Plan build upon existing successful efforts of the Regional Ocean Partnerships (ROPs) and related efforts in the Great Lakes, Pacific and Caribbean Islands, and Alaska recognizing they offer a substantive piece to implement a broader regional strategy. The ROPs are place-based partnerships that serve as forums to develop shared priorities and to take critical action on a broad diversity of ocean, coastal and Great Lakes needs. Established by the Governors, ROPs work in collaboration with federal agencies, tribes, local governments and stakeholders.

ROPs have shown significant leadership by producing meaningful and measurable results on-the-ground benefitting both the economy and the environment across a broad set of issues relevant to the National Ocean Policy. All of the ROPs either are creating or working under existing Action Plans that outline specific priorities and outcomes for each respective region and support a priority that supports integrated ecosystem protection and restoration. Several of the ROPs have already successfully aligned funding and effort across the federal and state agencies, as well as with several NGOs, to efficiently implement actions on such priorities. For example, in 2010, the Gulf of Mexico Alliance established habitat conservation priorities in the region through sea level rise mapping and leveraged multi-agency federal funding to develop a regional sediment management plan to decrease erosion and support restoration efforts along the coast.

The ROPs include the Northeast Regional Ocean Council, Mid-Atlantic Regional Council on the Ocean, Southeast Governors' Alliance, Gulf of Mexico Alliance, and West Coast Governors Agreement with related efforts through the Great Lakes Regional Collaboration.

The Action Plan should also consider the lessons learned by the existing National Estuary Programs, and those initiatives in specific bodies of water including the Chesapeake Bay, Puget Sound, San Francisco Bay, and the Great Lakes (Great Lakes Restoration Initiative as mentioned).

Related Obstacle: States, local communities, federal agencies and the public have dedicated significant time and resources to these successful efforts in the regions. It is critical that the Action Plan take steps to build upon these existing efforts, taking advantage of the expertise and momentum developed to date. In this tough fiscal climate, the Action Plan should look to avoid redundancy and to maximize efficiencies.

2. Support Land Acquisition through the Coastal and Estuarine Land Conservation Program (CELCP) and Related Programs

CSO recommends that the Action Plan support CELCP and related programs along the nation's coasts and develop national goals for coastal land acquisition. CELCP protects coastal and estuarine lands important for their ecological, conservation, recreational, historical, and aesthetic values, giving priority to ecologically-significant lands that can be managed for long-term protection. The program provides state and local governments with matching funds to permanently protect these important areas. CELCP uniquely allows the conservation of coastal land for various values and is not limited to a specific issue, species, or habitat. This type of program is invaluable to this nation as coastal development encroaches along our shorelines.

In addition to CELCP, the Coastal Zone Management Act (CZMA), a unique federal-state partnership program, provides federal funding that is matched by the states and often leveraged by other partners that can be utilized to acquire, preserve, and/or restore areas within a state. While not a strict acquisition or restoration program, it does provide opportunities to continue the advancement of coastal conservation. Support for the National Coastal Management Program will advance this objective.

Related Obstacle: While more funding is needed, it is difficult to secure increases for CELCP and other programs that facilitate coastal land acquisition and restoration in this fiscal climate. The Action Plan should look for opportunities to leverage resources, whether it is funding, personnel, etc., between related federal programs in order to maintain momentum and continue to build capacity at the federal, regional, state and local levels.

3. Coordinate Coastal Land Acquisition and Restoration Programs

CSO recommends that the Action Plan include steps to coordinate coastal land acquisition and restoration programs across the federal agencies. To facilitate and support this activity, CSO recommends developing a messaging campaign for the public and decision-makers comprised of these programs highlighting how they complement and build upon each other to bring about ecosystem protection and restoration. It is important that we grow the recognition and support of these programs to better protect and restore habitat in the long-term.

Related Obstacle: Unfortunately, federal land acquisition and restoration programs generally operate within their agency silos. It is important to breakdown these barriers, increase knowledge, and develop synergy across these related efforts to achieve true coordination and support for this objective.

4. Merge Green and Blue Infrastructure

CSO recommends that the Action Plan develop steps to work towards the integration of Green Infrastructure and Blue Infrastructure efforts around the nation. Green Infrastructure is commonly defined as an interconnected network of protected land and water that supports native species, maintains natural ecological processes, sustains air and water resources, and contributes to a community's health and quality of life. Blue Infrastructure often refers to priority coastal habitat, critical aquatic resources, and associated human uses in the tidal waters and near shore areas of coastal bays, as well as in the ocean. These two different types of infrastructure are often examined and managed in isolation from one another. Linking the nation's Blue Infrastructure with our Green Infrastructure efforts will highlight the near shore connections, where conservation and restoration activities can be targeted to maintain and improve coastal resources. It also allows for potential actions on the land or in the water to be viewed in a richer context, in how they may be positively reinforcing or at odds with each other.

Related Obstacle: Blue Infrastructure and Green Infrastructure are often independent on-the-ground efforts carried out by their respective federal and state agencies with jurisdiction over the relevant resources. To achieve more integrated ecosystem protection and restoration for the regions, impediments to coordination between the two communities of practice need to be addressed. Acquiring the data and information is also needed to identify and map the important green and blue resources.

5. Address Climate Change

CSO recommends that the Action Plan include steps to address climate change and its potential impacts on a successful protection and restoration strategy. Coastal and near shore habitats will be impacted in the short-term, and uniquely in each region and its

respective states by sea-level rise and lake level drops. It is important to link this Action Plan with elements from the Action Plan on Resiliency and Adaptation to Climate Change and Ocean Acidification.

Within this objective, there are opportunities for transformative change in the stewardship of our oceans, coasts, and Great Lakes. It will build strong, productive linkages between and amongst the states and the federal agencies, as well as other stakeholders. This is already evidenced by the relationships within the Regional Ocean Partnerships, where vertical levels of collaboration are enabling renewed attention to pressing issues and the leveraging of resources and expertise to integrate ecosystem protection and restoration. The Action Plan will also support and strengthen a broader approach to ecosystem-based management, moving beyond political boundaries. CSO recognizes that the milestones and performance measures will play an important role in providing credibility to the implementation of this objective. Depending on the steps contained within the Action Plan, CSO looks forward to discussing in more detail appropriate milestones and performance measures.

The states and territories strongly support the NOC in its work to implement the Regional Ecosystem Protection and Restoration objective. CSO appreciates the opportunity to comment and work with the National Ocean Council on this Action Plan.

Sincerely,



Braxton Davis
Chair
Coastal States Organization



Kristen M. Fletcher
Executive Director
Coastal States Organization

April 29, 2011

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: RAE Recommendations on *Objective 6: Regional Ecosystem Protection and Restoration*

Dear Chairs Sutley and Holdren, National Ocean Council Members:

On behalf of Restore America's Estuaries (RAE) and our eleven member organizations, we offer the following recommendations to the National Ocean Council (NOC) for use in developing a Strategic Action Plan for *Objective 6: Regional Ecosystem Protection and Restoration*. Since 1995, RAE has worked to preserve the nation's network of estuaries by protecting and restoring the lands and waters essential to the richness and diversity of coastal life. Through our eleven member organizations, we have successfully completed more than 900 coastal restoration projects nationwide, involved more than 265,000 volunteers, and restored more than 65,000 acres of coastal habitat.

RAE applauds the *Final Recommendations of the Interagency Ocean Policy Task Force* that recognizes the importance of ecosystem restoration in combating the degradation of the nation's coastal habitats. As the NOC works to develop its Strategic Action Plan for Objective 6, we urge the inclusion of the following action items that will help to overcome obstacles to achieving this objective.

Objective 6: Regional Ecosystem Protection and Restoration

Obstacle 1: Lack of dedicated and ample funding

The lack of funding for implementing protection and restoration projects is far and away the biggest obstacle to achieving this objective. As such, we recommend the following actions:

Short-term action

Execute a mechanism to allow pooling of funds across federal agencies for restoration projects

In this era of constrained budgets and competing priorities, agencies should be given the tools necessary to work together on projects that they otherwise would not have the resources to complete individually. Specifically, the NOC should identify and execute a mechanism that allows the pooling of funds across agencies in order to increase the pace and scale of restoration projects nationwide. This activity should be coordinated through the existing interagency Estuary Habitat Restoration Council.

Mid-term action

Create a long-term, sustainable private sector funding mechanism by supporting the development of greenhouse gas offsets methodologies and protocols for habitat restoration and protection

The NOC can help provide a new tool for funding coastal habitat protection and restoration projects – specifically climate change adaptation projects – by supporting the development of greenhouse gas offsets methodologies and protocols for habitat restoration and protection. Specifically, the Council should support full implementation of the “*Findings of the National Blue Ribbon Panel on the Development of a Greenhouse Gas Offset Protocol for Tidal Wetlands Restoration and Management: Action Plan to guide protocol development*”¹, published in August 2010 by Restore America’s Estuaries. This will allow new private investment in projects through the sale of carbon credits.

Coastal ecosystems sequester carbon from the atmosphere, and coastal wetlands, including tidal wetlands and mangroves, sequester carbon at rates 10-50 times greater than terrestrial forests. Worldwide, these same ecosystems are being lost at up to four times the rate of forests. In the United States, the opportunity for coastal restoration exceeds five to ten million acres.

Wetlands are also significant stores of existing carbon – centuries and millennia of carbon are stored in wetland soils. Degradation of these wetlands can cause a quick release of stored carbon, and thus protecting these carbon stores has strong potential as a climate mitigation strategy.

Coastal adaptation is also closely linked to restoration and protection – as sea levels rise, restoration and protection actions can provide a means for the migration of existing wetlands and the species that depend on them.

Greenhouse gas offsets protocols and methodologies will provide the linkage needed to bring tidal wetlands into the carbon markets and enable significant private sector funding for restoration and protection projects. The aforementioned Action Plan details the science and policy gaps that must be addressed in order to develop protocols and methodologies.

In the nearer term, demonstration projects in salt marsh and freshwater tidal managed wetlands would further development of the protocols and methodologies, advance the scientific understanding of the linkages between climate change and coastal restoration and protection, and demonstrate a new investment opportunity to the private sector. Demonstration projects are detailed in the aforementioned Action Plan.

¹ Restore America’s Estuaries, 2010. Retrieved from <http://www.estuaries.org/climate-change.html>

Obstacle 2: Lack of coordination within a unified national restoration strategy

The lack of coordination within a unified national strategy is a substantial obstacle that will stifle efforts to achieve regional ecosystem protection and restoration. As such, we recommend the following actions:

Short-term actions

Utilize the existing Estuary Habitat Restoration Council

The interagency Estuary Habitat Restoration Council, established by the Estuary Restoration Act of 2000, should be utilized to help set the nation's goals for restoration and to harmonize agency activities and leverage agency assets. With the new National Ocean Policy providing an overarching framework for the Federal government, and a demonstrated backlog of 814 shovel-ready habitat restoration projects totaling more than \$3 billion², the interagency Council is needed now more than ever to strategically coordinate all Federal estuary restoration efforts.

Establish a goal-oriented national vision that accommodates regional needs and differences

The NOC should task the Estuary Habitat Restoration Council to develop a goal-oriented national vision for estuary habitat restoration that provides direction and purpose to federal restoration agencies. This vision must also accommodate regional needs and differences, and have buy-in from, and align with, the missions of the agencies to be truly effective. An example of such an approach is "*A National Strategy To Restore Coastal and Estuarine Habitat*³," developed in 2002 by RAE in partnership with key federal agencies, NGOs, and universities. In addition, we also recommend review of "*Principles of Estuarine Habitat Restoration*⁴," developed in 1999 by RAE and the Estuarine Research Federation to guide restoration activities in coastal estuaries.

Identify needs and prioritize actions

The NOC should task the Estuary Habitat Restoration Council to identify the nation's restoration needs that are currently unmet, and prioritize and act on those that will greatly enhance our ability to restore estuaries nationwide. As an example, answers to specific socio-economic questions (e.g. what is the return on investment of restoration) would allow for a better explanation of the benefits of estuary restoration, which in turn helps to justify the need to increase the pace and scale of estuary restoration.

² "Commerce Secretary Gary Locke Announces \$167 million in Recovery Act funding for 50 Coastal Restoration Projects." NOAA press release, June 30, 2009. Most recently available at http://www.noaanews.noaa.gov/stories2009/20090630_restoration.html

³ Restore America's Estuaries, 2002. Retrieved from <http://www.estuaries.org/a-national-strategy.html>

⁴ Restore America's Estuaries, 1999. Retrieved from <http://www.estuaries.org/principles-of-estuarine-habitat-restoration.html>

Develop new project success indicators

The NOC should task the Estuary Habitat Restoration Council to identify project success indicators that emphasize project quality and output rather than the existing and often-misleading acreage indicator. If feasible, these indicators should be adopted by all federal restoration agencies.

Adopt existing science-based monitoring protocols

The Estuary Restoration Act required NOAA to establish minimum monitoring requirements for restoration projects. The NOC should ensure that all agencies are using consistent requirements for project monitoring by adopting these existing monitoring protocols.

Update the existing interagency restoration database

The Estuary Restoration Act required NOAA to develop and maintain a database of information concerning estuary habitat restoration projects. While NOAA's resulting database, the National Estuaries Restoration Inventory (NERI), does meet the requirements under the law, it is outdated, not comprehensive, and not user friendly. We view the database as having the potential to be an incredibly important and useful clearinghouse for all agency restoration information, including partner, project, program, and funding information. It also would reduce duplicative and competing databases used by restoration agencies, saving taxpayer dollars and helping to streamline restoration activities.

The NOC should task NOAA, as the lead restoration database agency and current Chair of the Estuary Habitat Restoration Council, to evaluate interagency database needs and solutions, and update the existing NERI database accordingly to be used by all restoration agencies. Content should include all estuary restoration projects that have been submitted to all agencies in order to track existing project needs for future solicitations. The database should be enhanced with improved data entry ability and GIS mapping technology that shows how restoration projects impact areas on a landscape scale (e.g., NOAA's Restoration Atlas using Google Maps; EKO-System's web-based project tracking system). Further, all information should be made available to the general public.

Create mechanisms for improved communication between all stakeholders

The NOC should employ robust stakeholder processes that will ensure engagement across all sectors, including local interests. In particular, the NOC should make better use of the wealth of ecosystem protection and restoration knowledge and experience that exists within the NGO community. Creating partnerships with NGOs brings considerable new assets to the table and helps ensure coordinated approaches.

Obstacle 3: Lack of societal awareness

The lack of society's awareness of the importance of protecting and restoring ecosystems is a third obstacle that will pose difficulty to achieving this objective. Similar to our nation tackling litter prevention in the 1960's and recycling in the 1990's, there is a need to educate and change personal behavior toward ecosystem value. As such, we recommend the following action:

Mid-term action

Creation of a Coastal Restoration Corps

The NOC should help to create a social service corps dedicated to coastal and estuarine habitat restoration. We view this corps as having the potential to leverage existing restoration assets, increase our nation's capacity to undertake much-needed habitat restoration, and change societal behavior to bring about a more robust stewardship ethic.

Tremendous untapped potential exists within the current collection of groups undertaking restoration throughout the country via community-based efforts. The goal of a Coastal Restoration Corps (CRC) is to network these groups with a national brand and collectively harness their expertise and ability in order to grow the size and effectiveness within the coastal restoration movement. Having a nationwide network will result in better coordination and integration of restoration and conservation efforts. A summary document⁵ is available that provides additional information on designing and implementing a restoration corps concept.

Initially, the CRC would implement projects currently ready to go but unable to be executed due to lack of staffing or similar hurdles. As evidenced by NOAA's ARRA restoration proposal process, a substantial backlog of coastal restoration projects exists – more than 800 shovel-ready projects totaling more than \$3 billion – and the CRC would be a powerful tool to accomplish on-the-ground work in a coordinated manner.

Once firmly established, the CRC would help address ongoing threats to our nation's coasts and estuaries. As a result of both the importance of and stressors affecting our coasts and estuaries, the CRC would provide an ongoing service of not only implementing much-needed habitat restoration projects but also providing workforce experience and training for the next generations of restoration professionals. In doing so, our coasts will continue to be improved over the span of decades through habitat restoration projects as future generations mature with a stewardship ethic and the knowledge and experience to make a meaningful difference.

One of the key elements of the CRC is to incorporate proven and scientifically valid practices into community-based habitat restoration. To that end, the CRC – and the restoration community as a whole – needs to have the wherewithal to investigate and share lessons learned surrounding current and upcoming techniques. We encourage the NOC to foster an environment and ongoing dialogue about what works, what doesn't, and how we, as a community can best work to restore coastal and estuarine habitats.

Milestones and Performance Measures: The CRC will function not only to directly restore habitat but also engage communities and provide needed workforce experience.

⁵ Restore America's Estuaries, 2011. Retrieved from http://www.estuaries.org/images/stories/Coastal_Restoration_Corps_workshop_two-pager_final.pdf

As a result, a suite of metrics will be applicable to the CRC that directly relates to regional ecosystem protection and restoration. Metrics include, but are not limited to:

- Habitat restored – e.g. acres of marsh, tons of shell, miles of riparian corridor, numbers of seedling plantings
- Volunteers in the CRC
- Community volunteers engaged as part of CRC projects
- Match leveraged
- Career path(s) of former CRC volunteers
- Economic effects of projects – ideally, economic data would be collected prior to and after implementation of restoration projects such that the full economic effect of the project would be measured

Restore America's Estuaries appreciates the opportunity to comment and looks forward to working with the National Ocean Council on this Action Plan.

Sincerely,

Jeff Benoit
President and CEO
Restore America's Estuaries

Tim Dillingham
Executive Director (and RAE Chair)
American Littoral Society

Peter Clark
President (and RAE Vice Chair)
Tampa Bay Watch

Donald S. Strait
Executive Director (and RAE Secretary)
Save the Sound – Long Island Sound

Jonathan F. Stone
Executive Director (and RAE Treasurer)
Save The Bay – Narragansett Bay

Roy Hoagland
V.P. of Env. Protection & Restoration
Chesapeake Bay Foundation

Steven Peyronnin
Executive Director
Coalition to Restore Coastal Louisiana

Peter Shelley
Senior Counsel
Conservation Law Foundation

Robert Stokes
President
Galveston Bay Foundation

Todd Miller
Executive Director
North Carolina Coastal Federation

Kathy Fletcher
Executive Director
People For Puget Sound

David Lewis
Executive Director
Save The Bay – San Francisco

**Comments for the National Ocean Policy Strategic Action Plans
from the
National Council for Science and the Environment's
11th National Conference on Science, Policy and the Environment:
Our Changing Oceans**

For three days in January 2011, the National Council for Science and the Environment (NCSE) convened 1,250 leaders in ocean science, policy, management and education, conservation and business to explore issues affecting the world's changing oceans. Their objectives were to advance science based decision-making on oceans by:

1. sharing the most current state of the science;
2. linking science to policy and other decisions;
3. communicating key messages and reframing issues;
4. developing targeted and actionable recommendations; and,
5. catalyzing long-term collaborations

Meeting participants put forth a spectrum of ideas on specific challenges facing the world's oceans. Here we present those recommendations that are germane to the National Ocean Policy process, mapped onto the nine Priority Objectives from the Final Recommendations of the Interagency Ocean Policy Task Force. Recommendations that were not targeted for the National Ocean Policy Strategic Action Plans (e.g., recommendations directed at Congress or the private sector) are not included here.

Because there is considerable overlap among these priority areas, some recommendations are included in more than one area, but we also encourage those working on individual priorities to view recommendations in related areas (for example, ecosystem-based management is very much connected with marine and spatial planning).

Because of the nature of the conference, there is considerable diversity in the types of ideas put forth - research, policy, education and outreach; regional, national and international; single agency, multi-agency and public-private partnerships. There is also considerable diversity in the budgetary implications of the recommendations. We recognize that the current budgetary situation places considerable constraints on the NOC process; constraints that may limit that ability of the government to implement some excellent ideas contained in this document. We ask you to be a forward looking as possible in considering the recommendations included here and "do your best."

In addition to the nine priority areas, we encourage the National Ocean Council to develop sets of cross-cutting recommendations in the areas of education (including public education, and pre-professional STEM and workforce education as well as attention to diversity of those knowledgeable about the oceans) and science (inventory and monitoring, observations, and fundamental and applied research). We are concerned that without such cross-cuts, the need for a comprehensive and integrated approach to ocean and coastal education and research, is not likely to be addressed.

We also encourage cross-cutting looks at particular issues such as the importance of oceans for human health and well-being and energy – both traditional (oil and gas) and alternative (wind and waves).

These recommendations are presented in spirit of constructive suggestions from the conference participants. Not all of the conference participants endorse all of the recommendations, and no recommendation should be interpreted as official input from the organizations where conference participants work. For additional information about the conference please go to www.OurChangingOceans.org.

We hope that you find this input helpful. We would be pleased to meet with the members of the National Ocean Council and your various teams and to assist in other ways.

Best wishes and success with your important work.

Margaret Leinen
Conference Chair

Peter Saundry
Executive Director

Priority Area 6. Regional Ecosystem Protection and Restoration

To help 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, the Federal Government and its agencies should:

- A. Develop new strategies to connect federal programs to local communities' need for scientific and practical knowledge to apply to planning and management of shoreline changes including natural, social and economic shifts.
- B. Emphasize the importance of regional approaches (such as Port Authorities in the U.S.A) to climate change adaptation solutions both within and outside the U.S.
- C. Set a goal of at least 10 percent of U.S. waters being designated as "no take" zones.
- D. Strengthen ocean resiliency through Marine Protected Areas (MPAs)
- E. Explore the creation of a legal mechanism for the designation, management, and enforcement of high seas Marine Protected Areas (MPAs) and MPA networks.

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 important 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.

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.

1. What near-term, mid-term, and long-term actions would most effectively help the Nation achieve this policy objective?

Near-term actions should focus on defining the extents and characteristics of key regional ecosystems and defining related conservation and restoration goals at the various levels of governmental jurisdiction, while also building capacities for implementing EBM, CMSP, and adaptive management principles. High priority should be given to restoration goals, while recognizing that the focus should be on restoration of ecosystem functions as required. For example, restoring the health of a coral reef typically must be done by restoring the health of the ecosystem within which the coral reef exists, such as reducing sedimentation reaching the reef, reducing nutrient levels of waters surrounding the reef, and increasing populations of herbivorous fish species as needed to control growth of algae. Short-term, mid-term, and long-term actions should all focus on means for protecting and restoring ecosystems as they undergo stressors from projected impacts of climate change, including sea level rise and ocean acidification. Mid-term and long-term actions must include implementing changes in laws, rules, and regulations as needed to fully implement regional approaches to ecosystem protection and restoration within an EBM framework.

2. What are some of the major obstacles to achieving this objective; are there opportunities this objective can further, including transformative changes in how we address the stewardship of the oceans, coasts, and Great Lakes?

The National Ocean Policy strongly promotes regional ecosystem protection and restoration, which should prove transformative when properly implemented, especially when compared to the alternative of states and local governments attempting to manage ecosystems impacted by actions outside their political boundaries. Major obstacles to achieving regional ecosystem protection and restoration include political processes, such as lobbying by the farm lobby in opposition of controls on land based agricultural processes that result in dead zones and other impacts on coastal ecosystems downstream. In addition, many salt marsh restoration projects on the East Coast involve removing *Phragmites* and lowering the level of the marsh so that *Spartina alterniflora* will grow. This does not take sea level rise into consideration and is not likely to be successful in the long term.

3. What milestones and performance measures would be most useful for measuring progress toward achieving this priority objective?

An early milestone should include an assessment of each Regional Ocean Council's plans for identifying regional ecosystems requiring restoration and protection and setting goals for protecting and restoring those ecosystems. Performance measures should be related to results of monitoring key environmental parameters as needed to track actual results versus goals.

April 29, 2011

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: Regional Ecosystem Protection and Restoration Strategic Action Plan

Dear Chairs Sutley and Holdren and National Ocean Council Members:

On behalf of the undersigned organizations and their combined membership, we offer the following recommendations to the National Ocean Council (NOC) for use in developing the Strategic Action Plan (SAP) for Regional Ecosystem Protection and Restoration, one of the priority objectives of the National Ocean Policy. Several of the undersigned organizations and our colleague organizations have submitted comment letters pertaining to the strategic action plans for Ecosystem Based Management,¹ Coastal and Marine Spatial Planning,² Water Quality and Sustainable Practices on Land,³ and Resiliency and Adaptation to Climate Change and Ocean Acidification,⁴ which we incorporate by reference here. Through those comment letters, other recommendations and the comments contained here we seek to provide the National Ocean Council with a range of examples and recommendations to 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.

The National Policy for the Stewardship of our Ocean, Coasts, and Great Lakes (National Ocean Policy) established by Executive Order 13547 was a historic step forward for the protection, restoration and sustainable management of our marine and Great Lakes ecosystems. The National Ocean Policy's foundation of stewardship is integral to maintaining the Nation's public trust of our ocean, coasts, and Great Lakes. The Vision behind the National Ocean Policy projects a level of national stewardship that "ensures that the ocean, our coasts, and the Great Lakes are healthy and resilient, safe and productive, and understood and treasured so as to promote the well-being, prosperity, and security of present and future generations."⁵ This Vision has a strong anchor in the many existing state and federal statutes and programs that authorize ecosystem and natural resource conservation, protection and restoration. The Strategic Action Plan for Regional Ecosystem Protection and Restoration therefore holds the advantage and

¹ See letter from Sarah Chasis, Natural Resources Defense Council, et al., to Nancy Sutley and John Holdren, Co-Chairs of National Ocean Council. Jan. 24, 2011.

² See letter from Sarah Winter Whelen, Regional Marine Conservation Project, et al., to Nancy Sutley and John Holdren, Co-Chairs of National Ocean Council. April 7, 2011.

³ See letter from Steve Fleischli, Natural Resources Defense Council, et al., to Nancy Sutley and John Holdren, Co-Chairs of National Ocean Council. February 11, 2011.

⁴ See letter from Sarah Chasis, Natural Resources Defense Council, et al., to Nancy Sutley and John Holdren, Co-Chairs of National Ocean Council. April 29, 2011.

⁵ Final Recommendations of the Interagency Ocean Policy Task Force, Part One. Page 10.

opportunity of being able to create immediate results in the health of ocean and coastal ecosystems. As a primary step the Regional Ecosystem Protection and Restoration SAP should propose and seek to implement immediate conservation actions where legal authority now exists within individual federal agencies and other established programs. The federal government should establish its leadership in the implementation of ecosystem protection and restoration measures and do everything feasible to empower states and municipalities to embrace and implement the National Ocean Policy. The following recommendations underscore the need to address regional ecosystem protection and restoration not just from a coastal and Great Lakes perspective, but also from an offshore ocean perspective since all manner of coastal, Great Lakes and ocean habitats and wildlife need significant restoration and protection. Overall, the Regional Ecosystem Protection and Restoration SAP should:

- identify short-term and long-term goals along with corresponding actions for identifying and protecting important ecological areas, restoring populations of marine wildlife and other living marine resources, and implementing immediate restoration activities that will improve and restore ecosystem function;
- identify current and future regional ocean, coastal, and Great Lakes programs and partnerships that will develop and implement regional strategic protection and restoration plans and specific actions to achieve them;
- articulate how the NOC should integrate use of existing regional plans and initiatives, including the Great Lakes Restoration Initiative.

I. Establishing Immediate Federal Leadership

In order to gain the full economic and environmental benefits that can come from the implementation of the National Ocean Policy, the NOC and every relevant federal agency must be engaged in implementation of the National Ocean Policy to the full extent of their statutory responsibility. This engagement needs to take place through the authorities of individual agencies and departments, through more common agency to agency coordination, through existing governmental, public and private partnership programs and through the coordination of newer multi-agency programs such as the Landscape Conservation Cooperative, the America's Great Outdoors program, the Great Lakes Restoration Initiative and the Smart from the Start Wind Energy Initiative.

Role of Federal Land Management Agencies

The leadership responsibility for a renewed approach to stewardship and healthy oceans is incumbent on the federal government. Nearly 30 percent of lands in the United States are managed and protected by the federal government.⁶ In many places throughout the country there are significant areas of federal lands under the jurisdiction of the Departments of the Interior, Agriculture, Energy or Defense which hold ecosystem components which are important for the health of our ocean and coasts. For example, Acadia National Park in Maine contains significant coastal land holdings on Isle au Haut and Mount Desert Island, as well as all or most of the land area of 14 other coastal islands. These islands serve as important habitats for migratory and year-

⁶ USDA report on Major Uses of Land in the United States, 2002.

round bird populations and hundreds of harbor and gray seals. Federal lands in all regions of the Nation establish land management plans for particular National Parks, National Forests, lands of the National Landscape Conservation System, lands administered by the Bureau of Land Management and the Departments of Energy and Defense. All public federal land areas, such as BLM lands, Fish and Wildlife Refuges, National Parks and National Forests, should seek to incorporate the principles of the National Ocean Policy as they develop and revise their federal land management plans. Lands managed by the Department of Energy, Department of Defense and others should also incorporate the principles of the National Ocean Policy where appropriate to their mission and allowed by statute. Positive examples of the Department of Defense conservation programs include the Partners in Flight⁷ bird conservation program and the removal of invasive plants as part of a project to restore wetlands at Naval Base Ventura County.⁸ Implementing the Vision of the National Ocean Policy and creating a culture that leads to a sustained commitment to stewardship relies on federal leadership from all departments.

Federal agencies should also have the responsibility to adopt and, where necessary, modify existing regulations to bring them into compliance with regional coastal and marine spatial (CMS) plans within an established timeframe unless governing statutes preclude such revision. All federal agencies with marine management responsibility should be required to participate in the development of regional CMS plans as part of each regional planning body. Once a regional CMS plan is completed and certified, all federal agencies serving on the NOC should be required to adhere to the CMS plan, not just the federal agencies that participated in the particular regional planning process.

Role of NEPA in Implementation of the National Ocean Policy

The role of NEPA can serve as a force that creates coordination and cooperation between the public, industry, stakeholders and state and federal agencies, yet NEPA has often been curtailed to the smallest degree possible in planning projects and left agency managers to “check the NEPA box.” We urge the National Ocean Council to request guidance from the Council on Environmental Quality regarding the proper role of NEPA in the implementation of the National Ocean Policy and the development and approval of coastal and marine spatial plans. The “essential elements” of coastal and marine spatial planning⁹ include some activities that could serve in a positive fashion to augment the role of NEPA and improve stakeholder and public engagement, help to ensure an open and transparent process and lead to better gathering and use of scientific, economic, cultural, technical, legal and human use data.

II. Priorities for Ocean Ecosystem Protection and Restoration

Identification and Protection of Important Ecological Areas

The Regional Ecosystem Protection and Restoration SAP states: “Along our coasts and Great Lakes, essential habitats continue to suffer significant losses and degradation due to coastal

⁷ See Department of Defense and Partners in Flight most recently available at <http://www.dodpif.org/>

⁸ “Naval base praised for wetlands protections.” Ventura County Star, March 30, 2011. Most recently available at <http://www.vcstar.com/news/2011/mar/30/naval-base-praised-for-wetlands-protections/>

⁹ See White House Council on Environmental Quality, Final Recommendations of the Interagency Ocean Policy Task Force (July 19, 2010), available at http://www.whitehouse.gov/files/documents/OPTF_FinalRecs.pdf . Page 41.

development, sea-level rise, and associated human activities.” This is certainly an accurate assessment and an appropriate call for action, but the priority objective fails to note the need for protection of *ocean* habitat. We believe this SAP should focus not only on coastal protection and restoration, but on ocean habitat protection and restoration as well. Ocean habitat in many regions of the country has suffered considerable impacts and ongoing degradation from human activities over time. We strongly urge the National Ocean Council to develop as part of the SAP a priority of identifying and protecting important ecological areas, specifically ocean habitat. The basic principles of conservation biology and the noted effectiveness of identifying important ecological features and habitats, reducing environmental impacts and stressors to those areas and providing long-term protection, will allow for the natural restoration of habitat structure, ecosystem function and the rebuilding and long-term protection of the full diversity of native species of ocean wildlife.¹⁰ The protection of important ecological areas is also discussed in the ENGO letter of January 24, 2011 regarding the Ecosystem Based Management SAP.¹¹

With respect to the identification of important ecological areas in our oceans, one of the immediate needs is the establishment of a consistent methodology for identifying important ecological areas in each CMS planning region. One option to explore would be for the NOC to establish a blue ribbon panel of government, state, academic, and other scientists to review the current literature on such methodologies and develop recommendations and a consistent protocol for each region to employ during their CMS plan development process. This process should also include protection of cultural sites and heritage areas that hold unique and sensitive ocean habitats that are valuable for recreational use, study and scientific research. This methodology should include identification of specific natural underwater geographic features such as canyons and seamounts, deep water and coral reefs, ledges, plains and mountains. The identification process should also analyze the possibility of establishing networks of important ecological areas on a scale that protects native species diversity, provides for a representation of varied habitat types, supports ecosystem functions and establishes connectivity to other protected areas.

National System of Marine Protected Areas

The United States has established in 2000 a national system of marine protected areas (MPAs) to advance the conservation and sustainable use of the nation's vital natural and cultural marine resources. The purpose of the national system is to support the effective stewardship, conservation, restoration, sustainable use, and public understanding and appreciation of the nation's significant natural and cultural marine heritage and sustainable production marine resources, with due consideration of the interests of and implications for all who use, benefit from, and care about our marine environment. This System is an integral part of the effort to

¹⁰ Scientific Consensus Statement on Marine Reserves and Marine Protected Areas. National Center for Ecological Analysis and Synthesis. <http://www.nceas.ucsb.edu/Consensus/consensus.pdf>. February 21, 2001. All 162 signatories are academic Ph.D scientists with expertise relevant to reserves.

¹¹ Our organizations were pleased to see stated in the *Final Recommendations* that “CMSP is intended to improve ecosystem health and services by planning human uses in concert with the conservation of important ecological areas, such as areas of high productivity and diversity; areas and key species that are critical to ecosystem function and resiliency; areas of spawning, breeding, and feeding; areas of rare or functionally vulnerable marine resources; and migratory corridors” (p. 44). One process for identifying and protecting IEAs can be found in Oceana’s August 23, 2010 *Important Ecological Areas in the Ocean: A Comprehensive Ecosystem Protection Approach to the Spatial Management of Marine Resources*.

synthesize marine protection activities across agencies and vital to implementation of the National Ocean Policy and should be incorporated into comprehensive regional ocean ecosystem protection actions as a component of broader regional efforts to identify and protect important ecological areas as outlined above.

Develop Integrated Databases

We also recommend the development of regional integrated databases to support the work of identifying important ecological areas and developing CMS plans – working with federal, state governments, academia and non-profit organizations. For example, in the Northeast there is a robust effort underway to develop an integrated marine database known as the Northeast Ocean Data Portal through a partnership among Applied Science Associates, the Gulf of Maine Research Institute, Massachusetts Ocean Partnership, the Northeastern Regional Association of Coastal Ocean Observing Systems, NOAA Coastal Services Center and The Nature Conservancy. This and similar regional database partnerships should be developed and supported in every region.

Identify needs and prioritize actions

The NOC should develop a process in each region to identify the needs for regional ocean protection and prioritize actions that will greatly enhance ocean health. This process would identify obstacles to improving and maintaining ocean ecosystem health by analyzing impacts to populations of native species, identifying various habitat types and stressors on those habitats, reducing impacts of pollutants and assessing needs and priorities for removal of marine debris, among others. This process could be conducted by established regional ocean partnerships or through a public and stakeholder process conducted by each regional planning body.

Ensuring ocean 'protection and restoration' aligns with best science

The protection and restoration of our aquatic environment and the living marine resources that constitute its character must be the foundation for the Nation's marine and coastal policy as well as the guide for its implementation. There are fundamental ecological principles, or attributes of marine ecosystems, that must be considered in order to maintain healthy ecosystems and important marine ecological areas. Consideration and implementation of these principles is essential for sustaining productive and resilient marine ecosystems and coastal communities now and for future generations. These fundamental attributes include:

- native species diversity,
- population abundance of key species,
- habitat diversity and heterogeneity, and
- connectivity between species and habitats.

Native Species Diversity - High native species diversity is fundamentally important for creating productive and resilient ecosystems. A diverse assemblage of species increases both the complexity of species interactions and the number of functions or jobs that are present in an ecosystem. As food web complexity and the number of functional groups increase, primary (e.g. kelp) and secondary (e.g. fish) productivity increase and the ability of the ecosystem to resist and recover from major stressors increases. Loss of species impairs the structure and function of an

ecosystem and removing too many species may result in an irreversible collapse of that ecosystem.

Population Abundance of Key Species – Key species, or groups of species, can have a disproportionate influence on ecosystem health. Seagrass, coral reefs and kelp beds, for example, are considered foundation species because they provide essential habitat and food resources for hundreds of species of marine plants and animals. Removal of these species alone can result in the collapse of the entire ecosystem. Other species populations are also important in other ways, such as the role of pollock, menhaden and other forage fish that serve as the basis of a larger food web.

Habitat Diversity and Heterogeneity - Habitat diversity and heterogeneity – the number of habitat types and how those habitats are arranged in space – are essential for healthy marine ecosystems. Diverse habitats promote species richness, complex predator-prey interactions, and generally improve environmental conditions, while habitat heterogeneity facilitates the successful movement of individuals between different habitats over their lifetime. Maintaining habitat diversity and heterogeneity also indirectly maintains species diversity, but must be maintained on a spatial scale that is relevant to the ecological processes that occur within those habitats. Protecting and maintaining various habitat types such as rocky outcroppings, muddy bottom, benthic cobble, sandy bottom and others is important but it is also vital to protect different areas of each type.

Connectivity - Marine ecosystems are connected to each other by the exchange of nutrients, larvae, and adults either by ocean currents or free-swimming individuals. The health and persistence of marine ecosystems relies on understanding how both adjacent and distant habitats interact with one another to sustain productive and resilient ecosystems. In order to maintain connectivity between various habitat types and species it is important to include migration corridors for marine mammals or pelagic fish species in protection schemes and to realize the role of currents and underwater geologic features, for example, in the dispersal of larvae and nutrients.

III. Priorities for Coastal Ecosystem Protection and Restoration

Utilize the existing Estuary Habitat Restoration Council

The interagency Estuary Habitat Restoration Council, established by the Estuary Restoration Act of 2000, should be utilized to help set the nation's goals for restoration and to harmonize agency activities and leverage agency assets. With the new National Ocean Policy providing an overarching framework for the Federal government, and a demonstrated backlog of 814 shovel-ready habitat restoration projects totaling more than \$3 billion¹², the interagency Council is needed now more than ever to strategically coordinate all Federal estuary restoration efforts.

¹² "Commerce Secretary Gary Locke Announces \$167 million in Recovery Act funding for 50 Coastal Restoration Projects. NOAA press release. June 30, 2009. Most recently available at http://www.noaanews.noaa.gov/stories2009/20090630_restoration.html

Identify needs and prioritize actions

The NOC should task the Estuary Habitat Restoration Council to identify the nation's coastal restoration needs that are currently unmet, and prioritize and act on those that will greatly enhance our ability to restore estuaries nationwide. As an example, answers to specific socio-economic questions (e.g. what is the return on investment of restoration) would allow for a better explanation of the benefits of estuary restoration, which in turn helps to justify the need to increase the pace and scale of estuary restoration. We also propose a similar approach to identifying obstacles to ocean ecosystem health and prioritizing actions to improve ocean ecosystem health in each region. This process could be conducted by established regional ocean partnerships or through a public and stakeholder process conducted by each regional planning body.

Establish a goal-oriented national vision that accommodates regional needs and differences

The NOC should task the Estuary Habitat Restoration Council to develop a goal-oriented national vision for estuary habitat restoration that provides direction and purpose to federal restoration agencies. This vision must also accommodate regional needs and differences, and have buy-in from, and align with, the missions of the agencies to be truly effective. An example of such an approach is “*A National Strategy To Restore Coastal and Estuarine Habitat*”¹³ developed in 2002 by RAE in partnership with key federal agencies, NGO's, and Universities.

Develop new project success indicators

The NOC should task the Estuary Habitat Restoration Council to identify project success indicators that emphasize project quality and output rather than the existing and often-misleading acreage indicator. If feasible, these indicators should be adopted by all federal restoration agencies.

Adopt existing science-based monitoring protocols

The Estuary Restoration Act required NOAA to establish minimum monitoring requirements for restoration projects. Since these guidelines already exist, the NOC should ensure that all agencies are using consistent requirements for project monitoring protocols by adopting these existing monitoring protocols.

Update the existing interagency restoration database

The Estuary Restoration Act required that NOAA develop and maintain a database of information concerning estuary habitat restoration projects. While NOAA's resulting database, the National Estuaries Restoration Inventory (NERI), does meet the requirements under the law, it is outdated, not comprehensive, and not user friendly. We view the database as having the potential to be an incredibly important and useful clearinghouse for all agency restoration information, including partner, project, program, and funding information. It also would reduce duplicative and competing databases used by restoration agencies, saving taxpayer dollars and helping to streamline restoration activities.

¹³ “*A National Strategy To Restore Coastal and Estuarine Habitat.*” Restore America's Estuaries. 2002. Most recently available at <http://www.estuaries.org/a-national-strategy.html>

The NOC should task NOAA to evaluate interagency database needs and solutions, and update the database accordingly. Content should include all estuary restoration projects that have been submitted to all agencies in order to track existing project needs for future solicitations. The database should be enhanced with improved data entry ability and GIS mapping technology that shows how restoration projects impact areas on a landscape scale (e.g., NOAA's Restoration Atlas using Google Maps; EKO-System's web-based project tracking system). Further, all information should be made available to the general public.

Creation of a Coastal Restoration Corps

The National Ocean Council should help to create a social service corps¹⁴ dedicated to coastal and estuarine habitat restoration. We view this corps as having the potential to change societal behavior, thereby helping to harmonize and leverage restoration assets.

Tremendous untapped potential exists within the current collection of groups undertaking restoration throughout the country via community-based efforts. The goal of a Coastal Restoration Corps (CRC) is to network these groups with a national brand and collectively harness their expertise and ability in order to grow the size and effectiveness within the coastal restoration movement. Having a nationwide network will result in better coordination and integration of restoration and conservation efforts.

Initially, the CRC would implement projects currently ready to go but unable to be executed due to lack of staffing or similar hurdles. As evidenced by NOAA's ARRA restoration proposal process, a substantial backlog of coastal restoration projects exists and the CRC would be a powerful tool to accomplish on-the-ground work in a coordinated manner.

Once firmly established, the CRC would help address ongoing threats to our nation's coasts and estuaries. As a result of both the importance of and stressors affecting our coasts and estuaries, the CRC would provide an ongoing service of not only implementing much-needed habitat restoration projects but also provide workforce experience and training for the next generations of restoration professionals. In doing so, our coasts will continue to be improved over the span of decades through habitat restoration projects as future generations mature with a stewardship ethic and the knowledge and experience to make a meaningful difference.

One of the key elements of the CRC is to incorporate proven and scientifically valid practices into community based habitat restoration. To that end, the CRC – and the restoration community as a whole – needs to have the wherewithal to investigate and share lessons learned surrounding current and upcoming techniques. We encourage the NOC to foster an environment and ongoing dialogue about what works, what doesn't, and how we, as a community can best work to restore coastal and estuarine habitats.

¹⁴ For more information on the Coastal Restoration Corps see the background fact sheet available at http://www.estuaries.org/images/stories/Coastal_Restoration_Corps_workshop_two-pager_final.pdf

IV. Ecosystem Restoration and Protection Finance Mechanisms and Public Engagement

Execute a mechanism to allow pooling of funds across federal agencies for restoration projects
Federal agencies should be given the tools necessary to work together on ecosystem protection and restoration projects that they otherwise would not have the resources to complete individually. Specifically, the NOC should identify and execute a mechanism that allows the pooling of funds across agencies in order to increase the pace and scale of restoration projects nationwide.

Support the establishment of an ocean trust fund

Given the environmental and economic importance of marine and coastal ecosystems, we recommend the establishment of an ocean trust fund, similar to the proposed National Endowment for the Oceans Act or the Ocean Resources Conservation and Assistance Fund. An ocean trust fund would provide for continued investments in monitoring, researching, protecting, and restoring the vitality of ocean ecosystems. This investment would also facilitate our ability to adapt to the long-term impacts of climate change and enhance ecosystem resilience so that ecosystems can better recover when disasters happen, whether man-made or natural. An ocean trust fund would ensure that some of the revenue that comes from the extraction and use of ocean resources is invested back into understanding and conserving our ocean.

Create mechanisms for improved communication between all stakeholders

The NOC should employ robust stakeholder and public processes that will ensure engagement across all sectors of ocean users and stakeholder groups, including local interests. In particular, the NOC should develop a process to make better use of the wealth of ecosystem protection and restoration knowledge and experience that exists within the NGO community. Creating partnerships with NGOs brings considerable new assets to the issue and helps ensure coordinated approaches.

V. Performance Indicators:

The Strategic Action Plan for Regional Ecosystem Protection and Restoration should include provisions for the development of regional performance indicators that can be used to periodically assess not only the health of the nation's coastal, Great Lakes and ocean ecosystems, but also the natural resources and socio-economics benefits of regional ecosystem restoration and protection activities. There are a suite of indicator projects underway in every region of the country and these projects and programs should be tapped to develop a set of consistent metrics for each region.

Conclusion

The National Ocean Policy is founded on sound science, an open and transparent public and stakeholder engagement process, the protection and restoration of ecosystem health, habitat and wildlife populations, and encourages government at all levels to work together. We urge the NOC to develop the Regional Ecosystem Protection and Restoration SAP with the primary goal

of creating the enduring environmental stewardship of our ocean, coastal and Great Lakes ecosystems that is the foundation of healthy communities, increased economic opportunities and a secure nation.

Sincerely,

Sean Cosgrove
Ocean Campaign Director
Conservation Law Foundation
Boston, Massachusetts

Jeff Benoit
President and CEO
Restore America's Estuaries
Arlington, Virginia

William Chandler
Vice President for Government Affairs
Marine Conservation Institute
Washington, DC

Sarah Winter Whelan
Regional Marine Conservation Project
American Littoral Society
Portland, Oregon

Anna Zivian, PhD
Marine Spatial Planning Senior Manager
Ocean Conservancy
Washington DC

Bruce J. Stedman
Executive Director
Marine Fish Conservation Network
Washington, DC

Sarah Chasis
Director, Ocean Initiative
Natural Resources Defense Council
New York, New York

Index:
Attachments to Comments
And Letters Received
Pertaining to Regional Ecosystem Protection
and Restoration and Other Strategic Action
Plans



National Fish Habitat Action Plan

Hall of the States
444 North Capitol Street, NW, Suite 725
Washington, DC 20001
Tel: 202/ 624-7890 ♦ F: 202/ 624-7891

Web www.fishhabitat.org

April 29, 2011

Chairwoman Nancy Sutley
Council on Environmental Quality, Executive Office of the President
722 Jackson Place NW
Washington, DC 20506

Director John Holdren
Office of Science and Technology Policy, Executive Office of the President
725 17th Street NW
Washington, DC 20502

Re: Recommendations for the Strategic Action Plans

Dear Chairwoman Sutley and Director Holdren:

On behalf of the National Fish Habitat Board (board), I am writing to provide our thoughts on the nine strategic action plans that will be developed by the National Ocean Council. We appreciate the opportunity to provide this input and look forward to working with you and the National Ocean Council to ensure that conservation and restoration of fish habitat is a key priority.

As you know, an unprecedented coalition of anglers, conservation groups, scientists, state and federal agencies, and industry leaders forged the National Fish Habitat Action Plan (action plan) in 2006. The action plan is an investment strategy for making the most effective use of habitat conservation dollars in achieving real gains in aquatic habitat quality and quantity by protecting, restoring, and enhancing key fisheries habitats. To date, the board has approved 17 regional Fish Habitat Partnerships (FHPs), spanning all 50 states. The FHPs involve a diverse group of public and private sector groups with common interests in conserving and restoring fish habitat. The FHPs work within a national framework to develop strategic plans, identify priorities, and leverage resources for on-the-ground conservation action.

In addition, the board and several federal agencies have invested in the first-ever national assessment of fish habitats within the United States. Based on that assessment, we just published a national report on fish habitat, *Through a Fish's Eye: The Status of Fish Habitats in the United States 2010*, which illustrates the relative magnitude and geographic distribution of many factors that contribute to aquatic habitat degradation. The work we conducted with our partners at the National Oceanic and Atmospheric Administration on the extent and causes of coastal and estuarine degradation is a tremendous step forward in the nation's understanding of the risk of current habitat degradation around the coast.

A web-based data mapping tool that has been developed in correlation with the report (www.nbii.gov/far/nfhap), can provide you with additional information about the assessment work we have completed. The tool was developed by the U.S. Geological Survey's Biological Informatics Program under guidance of the board's science and data committee. This tool not only enables users to see multiple views depicting the condition of stream and coastal habitats across the country, but also means that users are only a mouse click away from more detailed information at finer scales, and from the ability to download data files and map services.

As you move forward in developing action plans to implement the National Ocean Policy, we ask that you consider the following comments on the priority areas.

Coordinate and Support

The National Fish Habitat Action Plan is an important state-federal-private partnership program that is achieving results on the ground. We want to ensure that the National Ocean Council works to improve ecosystem-based management and implement regional ecosystem protection and restoration programs through existing programs and partnerships like ours. We do not want to see the creation of new programs that will take limited resources away from successful initiatives. It is important that the National Ocean Council takes the time and effort to ensure the regional planning bodies understand the existing programs and tools both state and federal agencies can bring to the table.

In addition, we want to ensure that some of the best tools the federal government has for ocean and coastal protection are not overlooked in implementing the National Ocean Policy. Both the Wildlife Habitat Incentive Program (WHIP) and the Environmental Quality Incentives Program (EQIP), run by the Natural Resources Conservation Service (NRCS) are significant tools in the nation's ability to enhance fish habitats along the coast. Since these two programs are in an agency that is not often associated with coastal and ocean issues, we feel it is important to draw your attention to them. As you know, these programs are significant contributors to reducing the hypoxic zone in the Gulf of Mexico through the Upper Mississippi River Basin Initiative. They are also being used to support Chesapeake Bay, Great Lakes, and other coastal restoration initiatives. We strongly encourage the National Ocean Council to work with NRCS to ensure WHIP, EQIP, and other appropriate NRCS conservation programs are used to effectively enhance important coastal fish habitat. This is particularly important to ensure that the fresh water resources so important to coastal and estuarine water quality and quantity are effectively managed.

Inform Decisions and Improve Understanding

As noted above, the board has completed a condition analysis of all fish habitats in the United States and the data is available through a state-of-the-art geographic interface on the internet. We believe the work we have conducted can inform decisions and improve understanding through further development of geospatial and data synthesis tools. These tools will link watershed conservation actions with downstream effects on the condition of coastal and marine habitats. We encourage the National Ocean Council and the regional planning bodies to work with us to build upon the work that we have already created.

Regional Ecosystem Efforts

The FHPs are directly involved in providing regional ecosystem conservation and restoration efforts. Ten of the 17 FHPs have an ocean or coastal nexus. The FHPs have developed science-based, collaborative strategies for conserving and restoring aquatic habitats while aligning goals among diverse partners that include federal, state, tribal, and non-governmental entities. Through the FHPs— the “primary work

units” of the action plan – stakeholders collaborate to implement fish habitat conservation projects that address their mutual goals. We encourage the National Ocean Council and the regional planning bodies to work with the FHPs to ensure regional ecosystem projects are implemented in accordance with already-established priorities for fish habitat conservation and restoration.

Finally, we also encourage the National Ocean Council and the Administration to support the passage of the National Fish Habitat Conservation Act (NFHCA). NFHCA will codify the important work that this state-federal-private partnership has achieved over the past six years, and ensure that focused, on-the-ground, grassroots-driven efforts to conserve and restore fish habitat continue throughout the United States.

If I can provide any additional information, please let me know.

Sincerely,

A handwritten signature in cursive script that reads "Kelly R Hepler". The signature is written in black ink and is positioned to the left of the typed name.

Kelly Hepler
National Fish Habitat Board Chairman

Participating Organizations

Alliance for a Living Ocean
American Littoral Society
Arthur Kill Coalition
Asbury Park Fishing Club
Bayberry Garden Club
Bayshore Regional Watershed Council
Bayshore Saltwater Flyrodders
Bellarm Seafood Co-op
Belmar Fishing Club
Beneath The Sea
Bergen Save the Watershed Action Network
Berkeley Shores Homeowners Civic Association
Cape May Environmental Commission
Central Jersey Anglers
Citizens Conservation Council of Ocean County
Clean Air Campaign, NY
Coalition Against Toxics
Coalition for Peace & Justice/Unplug Salem
Coast Alliance
Coastal Jersey Parrot Head Club
Communication Workers of America, Local 1034
Concerned Businesses of COA
Concerned Citizens of Bensonhurst
Concerned Citizens of COA
Concerned Citizens of Montauk
Concerned Students and Educators of COA
Eastern Monmouth Chamber of Commerce
Fisherman's Island Conservancy
Fishermen's Conservation Association, NJ Chapter
Fishermen's Conservation Association, NY Chapter
Fishermen's Dock Cooperative, Pt. Pleasant
Friends of Island Beach State Park
Friends of Liberty State Park, NJ
Friends of the Boardwalk, NY
Garden Club of Englewood
Garden Club of Fair Haven
Garden Club of Long Beach Island
Garden Club of RFD Middletown
Garden Club of Morristown
Garden Club of Navesink
Garden Club of New Jersey
Garden Club of New Vernon
Garden Club of Oceanport
Garden Club of Princeton
Garden Club of Rumson
Garden Club of Short Hills
Garden Club of Shrewsbury
Garden Club of Spring Lake
Garden Club of Washington Valley
Great Egg Harbor Watershed Association
Green Party of Monmouth County
Green Party of New Jersey
Highlands Business Partnership
Holly Club of Sea Girt
Hudson River Fishermen's Association
Jersey Shore Captains Association
Jersey Shore Parrot Head Club
Jersey Shore Running Club
Junior League of Monmouth County
Keyport Environmental Commission
Kiwans Club of Manasquan
Kiwans Club of Shadow Lake Village
Leonardo Party & Pleasure Boat Association
Leonardo Tax Payers Association
Main Street Wildwood
Mantoloking Environmental Commission
Marine Trades Association of NJ
Monmouth Conservation Foundation
Monmouth County Association of Realtors
Monmouth County Audubon Society
Monmouth County Friends of Clearwater
National Coalition for Marine Conservation
Natural Resources Protective Association, NY
NJ Beach Buggy Association
NJ Commercial Fishermen's Association
NJ Environmental Federation
NJ Environmental Lobby
NJ Main Ship Owners Group
NJ Marine Education Association
NJ PIRG Citizen Lobby
Nottingham Hunting & Fishing Club, NJ
NYC Sea Gypsies
NY State Marine Education Association
NY/NJ Baykeeper
Ocean Wreck Divers, NJ
PaddleOut.org
Piscataway Saltwater Sportsmen Club
Raritan Riverkeeper
Religious on Water
Riverside Drive Association
Rotary Club of Long Branch
Rotary District #7510—Interact
Saltwater Anglers of Bergen County
Sandy Hook Bay Anglers
Save Barnegat Bay
Save the Bay, NJ
SEAS Monmouth
Seaweeders Garden Club
Shark Research Institute
Shark River Cleanup Coalition
Shark River Surf Anglers
Shore Adventure Club
Sierra Club, NJ Shore Chapter
Sisters of Charity, Maris Stella
Sons of Ireland of Monmouth County
Sorporntist Club of Cape May County
South Jersey Dive Club
South Monmouth Board of Realtors
Staten Island Tuna Club
Strathmere Fishing & Environmental Club
Surfers' Environmental Alliance
Surfrider Foundation, Jersey Shore Chapter
TACK, MA
Terra Nova Garden Club
Three Harbors Garden Club
Unitarian Universalist Congregation/Monm. Cnty.
United Boatmen of NY/NJ
Village Garden Club
Volunteer Friends of Boaters, NJ
WATERSPIRIT
Women's Club of Brick Township
Women's Club of Keyport
Women's Club of Long Branch
Women's Club of Merchantville
Women's Club of Spring Lake
Women Gardeners of Ridgewood
Zen Society



Ocean Advocacy
Since 1984

Clean Ocean Action

18 Hartshorne Drive, Suite 2
Highlands, NJ 07732

www.CleanOceanAction.org

Telephone: 732-872-0111
Fax: 732-872-8041
Info@CleanOceanAction.org

April 29, 2011

Chairwoman Nancy Sutley
Council on Environmental Quality
Executive Office of the President

Director John Holdren
Office of Science and Technology Policy
Executive Office of the President

Re: Comments on Strategic Action Plans for the Priority Objectives for the National Ocean Council

Dear Chairwoman Sutley and Director Holdren;

The National Ocean Council (NOC) announced its intent to prepare strategic action plans for nine priority objectives for National Ocean Policy goal implementation and solicited comments from the public on January 24, 2011. See 76 F.R. 4139. These public comments should, according to the announcement, inform the preparation of the strategic action plans. Clean Ocean Action has prepared the following comments in response to that request.

Clean Ocean Action (COA) is a regional, broad-based coalition of 125 conservation, environmental, fishing, boating, diving, student, surfing, women's, business, service, and community groups with a mission to improve the degraded water quality of the marine waters of the New Jersey/New York coast. For over 25 years, COA has been actively engaged in ocean management to ensure a vibrant, diverse, economically robust ecosystem. From successfully closing eight ocean dumpsites and thwarting offshore drilling and exploration to promoting clean beaches, citizens have worked hard to ensure a clean ocean economy. Clean Ocean Action has, in addition to this letter, signed onto two other comments for this notice, one general comment and one comment on strategy item five.

Framework

In the announcement requesting comments for the strategic action plan development phase of the National Ocean Policy Framework, the NOC requested that for each of nine priority areas, we (broadly) answer these questions:

- What near-term, mid-term, and long-term actions would most effectively help the Nation achieve this policy objective?
- What are some of the major obstacles to achieving this objective; are there opportunities this objective can further, including transformative changes in how we address the stewardship of the oceans, coasts, and Great Lakes?
- What milestones and performance measures would be most useful for measuring progress toward achieving this priority objective?

Data and Mapping

Priority areas:

(3) Inform Decisions and Improve Understanding

(9) Ocean, Coastal, and Great Lakes Observations, Mapping, and Infrastructure

One Action that needs to be taken immediately is an across-the-board expansion of data collection—we simply do not know enough about many parts and aspects of the ocean environment, and we don't know enough about the industries that are operating within this environment. This broad data collection initiative should be done in an environmentally-unobtrusive manner. Furthermore, ecosystem and socioeconomic data should not be used to inform only a select few researchers or institutions, but should be available to all agencies and institutions and should be publically accessible.

The NOC should undertake an assessment of the state of the science in each “area” of the ocean and attempt to coordinate research to systematically fill gaps in knowledge, eliminate redundant research projects, and encourage more ecosystem-wide studies. Part of this initiative should be to develop, again for each marine area, one clearinghouse of coastal and ocean knowledge where methodologies, research projects, and data can all be accessed by any interested individual. Regional monitoring programs that have long-term funding are needed – especially for areas such as the Mid-Atlantic Bight which currently lacks a comprehensive regional program.

Obstacles to sharing data and informing decisions are plentiful, but not unresolvable. First, data collected by one agency or institution (the EPA, for example), may be in a form that doesn't comport with the needs of local decision-makers or state agencies. Second, collection methods that one agency uses may not be, by regulation, guidance, or policy, “admitted” by other agencies. Third, priorities in data collection vary by program and geographic location. Fourth, different research methods and tools may be used by different researchers. Fifth, technological and methodological innovation can result in differences within the same type of data collected over time – in other words, trends and time series might not mean that situations are changing, just that we've learned how to better measure a variable.

These challenges, and more, can be addressed through data collection standardization. If all agencies at all levels of government are working from the same methods documents and datasheets, we will improve our collective understanding of the state of our marine ecosystems. However, the process of data standardization needs to integrate some flexibility in order to avoid stifling innovation in scientific research.

Another impediment to informing decisions and improving mapping, infrastructure, and ecosystem understanding is the disconnect between the lay-public and expert scientists. Politics and communication play an important role in the implementation of the National Ocean Policy; if the public cannot understand why they need to protect these ecosystems, regional ocean managers will face an uphill battle in trying to convince people otherwise.

Many aspects of the National Ocean Policy itself (including associated frameworks, regulations, and policies) are not written in an easily-understandable form for public education. The NOC should try to distill and re-frame its mission and the steps it will be taking into a message easily transmitted to the public. Regulations and policies developed as a result of this process should also be communicated in “plain” English.

Coordination and the Decision-Making Processes

Priority areas:

- (1) Ecosystem-Based Management (EBM)
- (2) Coastal and Marine Spatial Planning (CMSP)

Actions that immediately need to be taken include data collection and information dissemination. EBM and CMSP implementation will (and should) rely heavily on baseline studies, pilot programs, and cumulative impact analyses. No decisions should be made to approve new uses of the coastal and ocean zone (including Outer Continental Shelf energy production, exploration, or siting), or to affect existing uses, without these pre-planning studies and research projects. The NOC should also advocate for legislation and regulations to prohibit programs from allowing ecological harm to the ocean – all too often discretion is given, under the guise of flexibility, to damage resources.

Aside from data collection and research studies, the NOC should also take immediate steps to require that EBM principles and policies are implemented across the nation in land use, environmental, and energy decisions. Decisions are now being made, daily, which should take EBM and scientific knowledge into account but do not. From stormwater permits to development plans and mitigation banks, incorporating understanding of ecosystems is critical to prevent and minimize impacts from actions taken.

While a top-down approach to managing the ocean and coastal zone (which is much of what the NOC will be doing) is needed, so too is a bottom-up approach. Requiring regular, sustained inclusion of the interested public at all stages of the process leads to stronger, more resilient plans and policies by identifying conflicts, providing knowledge about issues/problems present at all scales (national, regional and local) and allowing for the development of common solutions that lead to public support and ownership of policies, programs and activities. Getting the public to “*buy in*” to a policy developed from the top down is often not successful. Instead, the best public policies start from the grass-roots up. The interested public must “*be in*” on policy development early at the most local level, often and sustained, including regular and continuous communication and dialogue. Ultimately, determinations regarding appropriate ocean uses, allocation of space and resources, and protection of those resources will be based on societal choice. Public support for the preservation and protection of environmental resources is based on their understanding of environmental issues and their active role in developing management solutions. Therefore, the development and implementation of a National Policy must continue to include an explicit requirement for robust and ongoing public participation.

Obstacles may arise in implementing EBM and CMSP where the NOC tries to make ocean maps and use-plans without a truly comprehensive understanding of the ecosystem, where local managers make decisions that do not comport with the needs of the ecosystem, where state-by-state goals and uses are not aligned, and where there is not public support for the “hard” decisions that will need to be made. To overcome these obstacles, science and communication are key – especially where there are social and economic pressures that conflict with ecosystem needs or where there are overlapping and contradictory governance systems.

Implementing a National Ocean Policy

Priority areas:

- (5) Resiliency and Adaptation to Climate Change and Ocean Acidification
- (6) Regional Ecosystem Protection and Restoration
- (7) Water Quality and Sustainable Practices on Land

Action that needs to be taken by the NOC include empowering localities to make politically challenging decisions on coastal watershed uses and plans and developing toolkits and funding sources to enable coastal managers to encourage that these tough decisions are environmentally protective. Adaptation, resiliency, and sustainable practices, for ocean and coastal ecosystem management, tend to require local efforts more than national efforts. One major problem that towns and counties run into when, for example, they try to preserve wetlands, limit development in flood zones, de-harden coastlines, track pollution and sewage sources, or fix and upgrade water and wastewater infrastructure, is a lack of financial and technical support. Citizens need to be informed that adaption will mean accepting the loss of land due to sea level in certain areas. Data standardization, public disclosure, and inter-agency collaboration and coordination can all be conditions to financial and technical NOC support for these local programs – doing so would tie local actions to the NOC’s national strategy and allow all stakeholders to play a part in protecting, restoring, and adapting coastal ecosystems.

Obstacles for each of these priority areas (resilient coasts, ecosystems, and water quality) arise because most of these require local and state-level agencies expand their permitting, enforcing, monitoring, and regulating departments and may also require regulatory changes. The NOC can (and should) develop model programs and guidance for local and regional regulators, but many of the changes needed under these program areas can only be accomplished by local action. Local action, in turn, requires a renewed nation-wide investment in environmental programs – something the NOC must make a priority.

Conclusions

In general, regarding the NOC strategy for implementing the National Ocean Policy, Clean Ocean Action opposes regional governance systems that lack a public connection, accountability, and meaningful involvement in decision-making. Most of the decisions that will be required by the NOC’s plans depend on public support, so the NOC needs to ensure there is public accountability and involvement in actual, implementation and regulatory decisions – not just for purposes like this comment solicitation (public comment on strategy development). Along this vein, citizens, states, and regions have already begun ocean policy changes – and the NOC should inventory, analyze, and work within the goals these planners and managers have set for their own ecosystems.

As the NOC moves to develop strategies for National Ocean Policy implementation, priority should be given to (1) building a robust system of data standardization and dissemination, and (2) funding regional clearinghouses of information and policy discussion. The NOC should refrain from making conclusions as to coast-wide “use” maps or CMSP systems until baseline studies and ecological performance indices can be developed. Finally, because most of the changes called for in the National Ocean Policy will rely on local support and local change, the NOC should work, at state and federal levels, to secure more funding and support for local environmental programs – from enforcement to planning and research.

Sincerely,



Cindy Zipf
Executive Director



Sean Dixon
Coastal Policy Attorney



Heather Saffert, Ph.D.
Staff Scientist



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

April 29, 2011

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

Re: Comments on the National Ocean Council's Nine Strategic Action Plans

National Ocean Council Representatives:

The Coastal Treaty Tribes (CTT's), Hoh, Makah, and Quileute Tribes and the Quinault Indian Nation, of the Olympic Coast submit for your consideration comments and recommendations regarding the development of the National Ocean Council's Nine Strategic Action Plans.

We have individually and collectively been consistent in our messages that ocean management in the Pacific Northwest must be inclusive of the four coastal treaty tribes. Our concerns extend to all Nine Priority Objectives as not only does our usual and accustomed fishing grounds in marine waters, but our reservations and communities border the open ocean as well. We have been stewards of our land and waters since time immemorial. Preserving our fish and wildlife resources, as well as access to them, is essential to our economic, cultural, and spiritual well being.

Our legal standing and management status regarding ocean resources and governance is unique. Each of our tribes' has treaty secured hunting and fishing rights with the United States. These treaties retained rights to protect our way of life and reserved rights of hunting, fishing and gathering and are inclusive of our rights to manage and utilize marine resources in perpetuity. We are co-owners with the United States of these marine resources, and our co-management authority is legally recognized to include both state and federal waters. The development of a National Ocean Policy and Strategic Actions Plans must acknowledge and accommodate tribal values and activities with our usual and accustomed areas.

We are encouraged that the inaugural meeting of the Governance Coordinating Committee included identification of the tribes along with the state and federal representatives as co-leads in the Regional Planning bodies. We strongly urge the National Ocean Council to ensure (through communication and funding venues) that tribal participation is a high priority in the development and implementation of the National Ocean Policy. We expect that the Regional Planning Body for the West Coast will be created in keeping with the expressed intent of Executive Order 13547. Furthermore, it is our expectation that our

tribal governments will each have designated seats at the table given our status as sovereigns with treaty resources and management authority in ocean waters.

Specific and dedicated funding will be needed for the CTT's to engage at all levels of the National Ocean Policy. As sovereigns, the CTT's will need to be fully engaged due to their role as managers of the marine resources in order for the Nine Priority Objectives to successfully move forward. Dedicated funding for the CTT's will be especially important within the areas of CMSP, mapping and infrastructure, and resiliency and adaptation to climate change and ocean acidification. Funding is needed for education as well, both to get tribal knowledge out to educators, managers, scientists, and policy experts and to bring education opportunities to tribal communities.

The CTT submit the following for your consideration as the NOC develops the Nine Strategic Action Plans):

Coordinate and Support:

- Proper consultation with tribes is vital to the success of implementing the Action Plan and the National Ocean Policy in the northwest as tribal Usual and Accustomed Areas (U & A's) occupy the marine waters north of Point Chehalis to the U.S. Canadian border. We strongly suggest that this action plan will benefit from establishing a formal policy and protocol for consultation and consideration of the tribes at the NOC level. A couple of examples are:
 1. Coordination and Consultation Policy Plan of Action developed by the Environmental Protection Agency <http://www.epa.gov/indian/consultation/index.htm> or:
 2. Work done by National Marine Fisheries Service, Alaska Region at <http://www.fakr.noaa.gov/tc/>
- All of the action plans need to have a common theme that is in support of the United States governments' responsibility to uphold the treaties established between the federal government and the Coastal Treaty Tribes.

Ecosystem-Based Management:

- As stewards of ocean resources for thousands of years, the mainstream shift of marine resource management from single species to ecosystem-based is not a new principle in the management strategies of the coastal tribes. However, in order for Ecosystem-based management to become a fully integrated part of the National Ocean Policy there will need to be the establishment of the following:
 1. Creation of secure financial resources;
 2. The development of standards for data acquisition and processing
 3. Protocols for data and report availability
- In addition, we encourage the NOC to work with the regional fishery management councils and appropriate management authorities to ensure coordination with their existing efforts.

Ocean, Coastal, and Great Lakes Observations, Mapping, and Infrastructure:

- This will need to include a strong research component that identifies gaps in data that hinder or limit resource management decisions. With shifts in climate already a reality, it is critical to include a long term monitoring element that will establish both baseline conditions of ocean ecosystems as well as documenting the changes over time. Finally there are numerous assessments and inventories that in the short term can assist in guiding management decisions. Some examples of short term programs are:

1. Complete a data GAP analysis to identify the data needed to bring coastal waters off of Washington to an equal level of available data in Oregon and California coasts.
2. Conduct habitat and coastal current mapping.
3. Develop and complete stock assessments that forward understanding of important stocks at a regional scales.

Coastal and Marine Spatial Planning:

- The Regional Planning Bodies for the West Coast Region must include seats for tribal representatives as the CTT will be directly affected by CMSP. In short, planning for implementation of NOP or CMSP cannot occur off the Olympic Peninsula without each of the 4 coastal sovereign tribes being part of the discussion and planning.
- Currently, it appears that the NOC views the West Coast Governors Agreement on Ocean Health (WCGAOH) as the potential entity for the regional ocean partnership for the west coast region. This is not acceptable because WCGAOH does not satisfy the terms of a ROP as described by the NOC and most importantly, because the tribes are not part of the WCGAOH.
- As with the west coast states the CTT will require dedicated funding for the duration of the planning effort for coastal and marine spatial planning. Expecting the tribes to access funding through a competitive grant process wrongly puts the needs of tribal ocean policy and management as sovereigns in competition with stakeholders who already have a voice through their state elected officials.

Resiliency and Adaptation to Climate Change and Ocean Acidification:

- Tribes and coastal communities are experiencing climate change now, not only are resources affected by climate change but also the characteristics of the regions culture as well. Tribes can offer a unique perspective to how the NOC addresses Climate Change within the National Ocean Policy for our region.
- The effects of ocean acidification on the exercise of treaty rights to harvest marine resources both commercially and for subsistence are largely unknown. Tribal communities rely on these resources for our cultural and economic wellbeing. The potential changes or impacts as a result ocean acidification is beyond comprehension.

Regional Ecosystem Protection and Restoration:

- The large size of each of the regions indentified by NOC must be taken into consideration. As we stated in earlier correspondence: the "West Coast Region" may be too large; we must remember that the "large California current ecosystem" is the result of multiple smaller systems that function with some independence.
- Dedicated financial support for understanding the chemical and biological relevance of these sub-systems would help ensure that conservation and restoration efforts are effectively distributed. Effective distribution must be based on sound science so that areas of low population and high need do not lose out to areas of high population.

Inform Decisions and Improve Understanding:


- While not always considered, local knowledge such as that preserved in Tribal cultures can provide information that is not available elsewhere, to inform management decisions

The CTT would like to reiterate their support for the National Ocean Council and its critical role in implementing the National Ocean Policy. Thank you for this opportunity to comment and we look forward to working with the Council as you draft the Strategic Action Plans.

Sincerely,

Coastal Treaty Tribes of the Olympic Coast

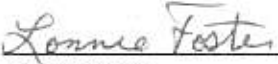
Hoh Indian Tribe


David Hudson

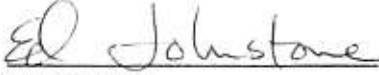
Makah Tribe


Micah McCarty

Quileute Tribe


Lonnie Foster

Quinault Indian Nation


Ed Johnstone

**COMMENTS SUBMITTED TO THE NATIONAL OCEAN COUNCIL
ON STRATEGIES FOR IMPLEMENTING THE PRIORITY OBJECTIVES
OF THE NATIONAL OCEAN POLICY
April 29, 2011**

Dear Council Members:

The undersigned include fishermen, representatives of coastal fishing communities, scientists, environmental organizations, farmers, farming community organizations, seafood distributors, and food sovereignty organizations. We appreciate the opportunity to make recommendations regarding some of the nine priority objectives of the National Ocean Policy in addressing some of the most pressing challenges facing the ocean, our coasts, the Great Lakes and the food we get from these waters.

Objectives 1 & 2 & 6

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

Coastal and Marine Spatial Planning (CMSP): Implement comprehensive, integrated, ecosystem-based coastal and marine spatial planning and management in the United States.

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.

Ecosystem Based Management and Coastal and Marine Spatial Planning are fundamentally linked and should not be considered separately from each other. Similarly, ecosystem protection and restoration are not separate decisions but fully integrated with EBM and CMSP. That different governmental bodies are responsible for their implementation should not prevent or impede the planning, restoration and management plans from being integrated.

RECOMMENDED ACTIONS

Near-term:

- EBM that includes humans as an integral part of ecosystems should be adopted in principal by all federal agencies whose activities affect marine, estuarine, and Great Lakes environments including management agencies and programs, e.g. among others: National Marine Fisheries Service (NMFS), NOAA Office of Ocean and Coastal Resources Management and the Coastal Zone Management program it administers through states, National Marine Sanctuary programs, Bureau of Ocean Energy Management, Regulations, and Enforcement (BOEMRE), Department of Agriculture, and Environmental Protection Agency, Army Corps of Engineers and Forest Service.
- Relative to CMSP, regional oversight structures and operational menus for more local implementation should be developed. The structure should incorporate governmental, tribal, community, and non-governmental

participants concerned with public welfare, including all those along the seafood production food chain from fishermen to processors to consumers, and those representing environmental, human health and sociological interests that function at a variety of scales.

- Guidelines and structures should be developed for establishing truly collaborative decision-making and adaptive management that gives weight to: restoring and maintaining diverse and resilient ecosystems; sustaining healthy living resources; and revitalizing coastal communities closely linked to those marine and Great Lakes resources and ecosystem services through such activities as fishing).
- The National Ocean Council should review existing legislation governing the management of marine and Great Lakes ecosystems and resources and alert Congress if changes are needed to accommodate full implementation of collaborative and adaptive EBM and CMSP at various ecosystem scales.
- The importance of living marine and aquatic resources to local, regional, and national food sovereignty should be recognized and given weight in the CMSP and EBM decision-making processes.
- The roles and responsibilities of the existing regional bodies important to implementing EBM, such as Fisheries Management Councils (which has management powers) and the International Joint Commission (US and Canada Great Lakes advisory body), should be integrated into NOP strategies.

Long-term:

- EBM, including Ecosystem Based Fisheries Management, should be fully implemented in management plans that are integrated on multiple scales consistent with ecosystem processes and integrate local participatory governance with regional oversight.
- EBM must be scientifically based and promote the long-term health and diversity of ecosystems, living resources, and ecosystem services. As a subset of this, Ecosystem Based Fisheries Management, must include fishermen as part of the ecosystem.
- EBM should be spatially based and coordinated with CMSP based on collaborative bottom-up decision-making and adaptive management that integrates ecological, sociological, and economic objectives.
- CMSP should begin with collaborative visioning processes with outcomes incorporating socio-economic elements on spatial scales that are well matched to the ecosystem, consistent with the goals of EBM. The outcomes of visioning should guide future decision-making and establish measuring posts for assessing progress.
- Food sovereignty should be incorporated into the vision guiding CMSP, so that in planning for activities in the marine and Great Lakes environment, fisheries and local and regional markets and food systems are supported and protected.
- Restoration of critical habitats and ecosystem diversity, including fisheries diversity, should be integral to CMSP.
- Monitoring should be keyed to vision milestones and spatial planning should

- be adaptive to the results of monitoring, to unexpected changes, and to the evaluation of progress toward the guiding vision.
- The incorporation of local knowledge into CMSP is critical and should be part of planning and woven into the monitoring programs. Collaboration among scientists, users, local communities, and managers is critical to doing this effectively.

IDENTIFYING CHALLENGES

Obstacles and Opportunities:

Adaptive management. None of this is easy and it requires repeated exchange of information and discussion of adaptive measures. Ecosystems are complex so management that truly addresses the ecosystem is also complex. That is why the adaptive aspect is so important and should be addressed more seriously in the National Ocean Policy. Many monitoring and research programs would have to be revamped and augmented to enable adaptive management. Data for different types of management (e.g. fisheries, water quality, aquaculture, energy exploitation) would have to be detailed and coordinated at multiple scales. Monitoring must at the same time be individualized to capture critical scales of ecosystem variables and be common enough to be used in combination with other monitoring programs. This difficult coordination of data collection could be aided by effective and well funded regional plans.

Existing models. Agencies such as National Marine Fisheries Service (NMFS), have been actively discussing and developing scientific protocols for ecosystem-based fisheries management and EBM in general. While the need to include fishermen in these EBFM management plans persist, there is still not a good model for how this can be most effectively done. Recommendations from fishing communities for area-based management are promising but have yet to be accepted by regional management. In other EBM efforts on land, some agencies have model collaborative processes that include community participation in planning and have had some notable successes on local scales. We believe these processes can be translated for the ocean and Great Lakes.

Relevant programs. Existing collaborative research programs take advantage of smaller vessels and their operators, both scientists and fishermen who are knowledgeable about marine ecosystems. These could be improved with more participation and compensation, better coordination, and better use of the information in management decisions and adaptive management. This smaller scale research has been undervalued in the past. Ironically it is generally far less expensive to acquire abundant information this way and it reveals important ecosystem patchiness. It also offers more rapid assessment of data to enable adaptive management in real time.

Multi-scale management. Long-term management decisions should meld fine scale with regional scale information; and management structures should reflect multiple scales of ecosystems. This presents challenges to simplified management that

averages over large areas and considers species separately from each other.

Transformations:

The issue of scale in fisheries. We strongly recommend a major transformation in scales of monitoring and management, particularly in fisheries management:

- *From* top-down, broad brush management that encourages fishermen to pursue fish over distances that require larger boats; *to* bottom-up, spatial and community-based management that encourages cooperation and stewardship among groups of fishermen
- *From* scale blind management of fishing operations; *to* scale sensitive management consistent with ecosystem processes and distributions. At a minimum this would divide management of inshore fleets from management of offshore, larger boat fleets, and would match fishing scales and diversity to scales and diversity in ecosystems.

The issue of scale in general. For all uses of marine and Great Lakes environments, it is important that scales of monitoring and management as well as scales of activities themselves match ecosystems and ecosystem processes.

Bottom-up decision making. We recommend transforming decision-making processes from strictly top down regulation and management in which stakeholder comments and advice are heard but rarely incorporated; to bottom-up collaborative processes in which agreement, consistent with regulatory requirements, is reached by all participants from individual stakeholders to government officials. By nature the bottom up processes tend to be more local and thus more diverse but better adapted to specific ecosystem traits. Polarized controversy is often avoided.

Application of the Public Trust Doctrine. All private industry operating in marine and Great Lakes waters, which are public, must be open to scrutiny by the public and allowed to operate only if and under conditions agreed through collaboration with the public.

We encourage the recognition and incorporation of fisheries diversity and food sovereignty objectives into CMSP. The provision of healthful and diverse local seafoods from healthy ecosystems is critical to the welfare of coastal communities and regions depending on them. We believe:

- Fisheries should maintain diversity in the fleet and in the ecosystem.
- Ecosystems should be protected from degradation by all causes so they may continue to support diverse fisheries.
- Fisheries should be executed by coastal communities and operated according to strict codes of stewardship.
- Seafood markets should prioritize local consumption of seafood and minimize exports.
- Fair and equitable distribution of fishing rights and fair compensation for fishermen should be objectives.

- The farming of seafood should be consistent with ecosystem objectives, maintenance of wild species and populations, diverse food production, aversion to non-native species, and prohibition of manufactured species (i.e. genetically engineered).

IMPORTANT PERFORMANCE MEASURES

It is essential that monitoring be directly relevant to the goals and objectives of management and policy decisions and tied to visioning processes.

- There must be a way of gauging management effectiveness and trade-offs between uses and ecosystem services so that adaptive management can be implemented. Outcomes of initial visioning will give end-points toward which progress can be measured by monitoring key indicators.
- Performance measures should be determined at the beginning when management decisions are first implemented.
- The US needs integrated, ecological-economic visualization, analysis, and forecasting in the coastal zone.

Objectives 5 & 7

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.

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.

Both these objectives address impacts on marine and Great Lakes ecosystems from land-based activities – impacts that can fundamentally alter ecosystems, including their diversity of species, their resiliency, and their ability to provide ecosystem services. Climate Change and Ocean Acidification are caused on global scales but they affect ecosystems on all scales. Land based source of water pollution are caused by direct emissions or runoff and have impacts in local marine and Great Lakes ecosystems or may be carried by air and water currents to create impacts in remote locations. We recommend:

- Any national level planning should include measures to minimize and prevent land-based sources of negative impacts on marine and Great Lakes ecosystems; and they should coordinate with local plans to do the same.
- Synergistic and cumulative impacts of these effects from land plus those of at-sea activities must be taken into account and monitored in conjunction with CMS Planning.
- Strong, swift and effective regulations and measures to continuously reduce US generated causes of climate change and ocean acidification are essential.
- Similarly, improved enforcement of water and air quality laws and standards is needed.
- The objectives of coastal and port community plans to mitigate land-based sources of impacts to marine and Great Lakes ecosystems should be supported by national actions and monetary and technical support.

Objectives 3 & 9

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.

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

Some monitoring and research needs have already been mentioned in conjunction with regional and smaller scale management. We support as well the development and improvement of national research and monitoring systems that would provide a basis for overlaying and integrating finer scale research and monitoring significant to local and regional decisions but comparable across large marine and Great Lakes ecosystems for the purpose of national coordination.

We encourage basic research on ecosystem functions, interactions among species, effects of changing marine and Great Lakes environments, the human role in ecosystems, important scales of ecological processes, and other areas where more knowledge would enhance the effectiveness of ecosystem based management. It would enable identification of key indicators for measuring progress in achieving goals.

We encourage the incorporation of sociological research that sheds light on and enables measurement of the social and economic impacts caused by management actions as well as such impacts caused by human-induced changes in ecosystems. The relatively new science of ecological-economic visualization, analysis, and forecasting in the coastal zone is not widely known or acknowledged. We encourage the recognition and funding of this important line of research.

Sharing information with the public is critical to successful collaborative management. The development of user-friendly templates should be a priority for regional ocean councils. It is critical that the public be informed at the initial stages of producing management plans (both EBM and CMSP), and that they receive information and data used throughout the adaptive management process.

Summary

We offer the following summary of key strategies we have recommended and explained above:

- Collaborative management at local scales;
- Adaptive management and monitoring;
- Visioning processes at various levels of management;

- Accounting for humans as part of the ecosystem;
- Monitoring to measure achievement of objectives;
- Scale-sensitive matching of activities with ecosystem processes in ocean, coastal, and Great Lakes environments;
- Multi-scale spatially based management;
- Protection of food sovereignty and marine-based food systems;
- Bottom up decision-making;
- Management for the public good and with public oversight;
- Protection of food sovereignty in context of CMSP;
- Pollution prevention;
- Ecological-economic visualization, analysis, and forecasting;
- Integration of local knowledge with sound science; and
- Sharing of knowledge and data effectively with public in a timely manner.

Yours truly,

Boyce Thorne Miller (contact boyce@namanet.org)
 Science and Policy Coordinator
 Northwest Atlantic Marine Alliance
 Gloucester, Massachusetts

Robin Alden
 Executive Director
 Penobscot East Resource Center
 Stonington, Maine

Gary G. Allen
 Executive Director
 Gary G Allen Center for Chesapeake Communities
 Annapolis, Maryland

Patrician Anderson
 President
 Granite State Fish
 Hampton, New Hampshire

Barbara S. Arter
 Executive Director
 Friends of Blue Hill Bay
 Blue Hill, Maine

Nikhil Aziz, Ph.D.
 Executive Director
 Grassroots International
 Boston, Massachusetts

Jim Bates
Former Congressman
Truth in Labeling Coalition
San Diego, California

Judy Braiman
President
Empire State Consumer Project, Inc.
Rochester, New York

Jennifer F. Brewer
Assistant Professor, Department of Geography
Assistant Scientist, Institute for Coastal Science and Policy
East Carolina University
Greenville, North Carolina

Lynda Brushett, PhD
Cooperative Development Specialist
Cooperative Development Institute
Portsmouth, New Hampshire

Ben Burkett
Mississippi Association of Co-operatives/Federation of Southern Co-operatives
Jackson, Mississippi

Kathleen Burns
Director
Sciencecorps
Lexington, Massachusetts

Jim Chambers
Founder/Owner
Prime Seafood, LLC
Kensington, Maryland

Marianne Cufone
Director, Fish Program
Food & Water Watch
Washington, DC

Kathleen A. Curtis, LPN
Policy Director
Clean New York
Albany, New York

Aaron Dority
Sector Manager
Northeast Coastal Communities Sector
Stonington, Maine

Don Eley
President Friends of Blue Hill Bay
Blue Hill, Maine

Noemi Giszpenc
Executive Director
Cooperative Development Services
Shelburne Falls, Massachusetts

William F. "Zeke" Grader
Executive Director
Pacific Coast Federation of Fishermen's Association
San Francisco, California

Jaydee Hanson
Senior Policy Analyst
Center for Food Safety
Washington, DC

John Hocevar
Ocean Campaign Director
Greenpeace
Washington, DC

Ted Hoskins
Blue Hill, Maine

James Houghton
Downeast Foodshed
Bar Harbor Maine

Anne Mosness
Fisher's Choice Wild Salmon
Bellingham, Washington

Heidi Nutters
San Francisco, California

Joann Lo
Food Chain Workers Alliance
Los Angeles, California

Kathy Ozer
National Family Farm Coalition
Washington, DC

Pietro Parravano
President
Institute for Fisheries Resources
Half Moon Bay, California

Alfredo Quarto
Executive Director
Mangrove Action Project
Port Angeles, Washington

Tristan Quinn-Thibodeau
Outreach and Partnerships Coordinator
Global Movements Program
WhyHunger
New York, New York

Sara Randall
School of Policy and International Affairs
School of Marine Science Graduate Assistant
University of Maine

Judith Robinson
Associate Director
Environmental Health Fund
Jamaica Plain/Boston, Massachusetts

Angela Sanfilippo
President
Gloucester Fishermen's Wives' Association
Gloucester, Massachusetts

Ted Schettler
Science Director
Science and Environmental Health Network
Ames, Iowa

Ellen Parry Tyler
2011 Candidate
Agriculture, Food & Environment
Friedman School of Nutrition Science and Policy
Tufts University

Boston, Massachusetts

Adriana Voss-Andreae, MD PhD
Portland, Oregon
Daniel Wallace
2012 Muskie School of Public Service
University of Southern Maine
Portland, Maine

Barbara Warren
Executive Director
Citizens' Environmental Coalition
Albany, New York

Diane Wilson
Calhoun County Resource Watch
Seadrift, Texas