

# APPENDIX: Public Comments on Draft Strategic Action Plan Outlines

The National Ocean Council (NOC) released nine strategic action plan outlines for public review to provide an initial view as to how Federal agencies might address the priority objectives as described in the National Ocean Policy (Policy). The outlines, by design, were draft products that served as an early and valuable point in the plan development process for focusing public and stakeholder input.

During the public comment period June 2-July 2 2011, the NOC received over 400 contributions to the NOC web page from over 200 individuals and groups. In addition, about 1000 individuals and groups participated in and provided comments at 12 regional listening sessions.<sup>1</sup> The NOC agencies evaluated more than 850 specific comments from stakeholders and the public, many representing multiple submissions of very similar comments. The NOC considered all of the comments and accepted many of these, incorporating them into the draft Implementation Plan.

This Appendix summarizes the most substantive and frequent public comments and how they are addressed in this draft Implementation Plan. Reflecting the diversity of stakeholder input, this Appendix consolidates the comments and NOC responses under four themes, which the NOC used to guide the development of this draft Implementation Plan. These are: (1) adopt ecosystem-based management; (2) obtain, use, and share the best science and data; (3) promote efficiency and collaboration; and (4) strengthen regional efforts.

## ADOPT ECOSYSTEM-BASED MANAGEMENT (EBM)

**The public comments on EBM indicated broad support for this approach to management. Some mentioned that EBM has been used with success previously.**

*The Executive Order specifies that EBM is critical to how we govern and manage our ocean, coasts, and Great Lakes, and charges the Plan to address how it will be defined and implemented. In the draft Implementation Plan, the EBM section (pp. 9-17) focuses on actions that will provide the collaboration and science frameworks, training and education, and best practices for implementing EBM. In addition, actions to support EBM or apply it to specific regional efforts are included throughout the draft Plan.*

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<sup>1</sup> Washington, DC; Barrow, AK; Anchorage, AK; Chicago, IL; Jacksonville, FL; Honolulu, HI; Exeter, NH; Galveston, TX; Ocean Shores, WA; San Francisco, CA; West Long Branch, NJ; Portland, OR

**Many comments pointed out the need for a clear and consistent definition for EBM that will be incorporated into management decisions, including project planning, policies, and programs.**

*The Final Recommendations of the Interagency Ocean Policy Task Force called upon the NOC to define EBM as it develops strategic action plans (now the draft Implementation Plan). The NOP started with MacLeod et al. (2005), which defined EBM as “an integrated approach to resource management that considers the entire ecosystem, including humans”, and noted that the goal of EBM is “to maintain an ecosystem in a healthy, productive, and resilient condition so that it can provide the services humans want and need”. The NOC built upon this definition, and its accompanying list of elements and characteristics, with modifications that reflect the views of multiple Federal agencies as they address implementation of EBM. The resulting definition is on pages 10-11 of the Plan.*

**Several comments suggested that potential actions to address the EBM priority objective should focus on the important beginning steps that will lead to EBM forming the foundation for management decisions regarding the ocean, our coasts, and Great Lakes. However, this must be based on good science and scientific information that is transparent to all participants and interested parties, and communicated to all levels of government and to all stakeholders and users.**

*Strategic use of EBM as an approach to implementing the NOP and science-based planning and decision-making is an incremental process. The Ecosystem-based Management section of the draft Plan describes actions establishing frameworks for the science to support EBM and for Federal collaboration. Other actions provide training and the conduct of EBM pilot projects. These are important initial steps toward implementing EBM nationally. Action 3 in the Inform Decisions and Improve Understanding section (pp. 21-22) supports EBM through robust science, information, and decision-support tools. Other actions throughout the draft Implementation Plan will apply these frameworks and tools to implement EBM regionally.*

**EBM should rely on science-based decision-support tools, including but not limited to CMSP, so that CMSP is not a goal, but a process to help inform and implement EBM.**

*The draft Plan clarifies that CMSP is an important EBM tool that provides transparent information about ocean use, relies upon significant public and stakeholder participation, and will inform management decisions affecting the ocean, coasts, and Great Lakes. It creates an inclusive, bottom-up, regionally-driven planning approach that gives Federal agencies, States, Tribes, and regions the ability to make informed decisions about how best to use ocean and coastal resources. The regional CMSP process will build upon and expand, as appropriate, successful regional efforts.*

**Some comments recommended that EBM should be included in non-Federal planning and regulatory frameworks for coastal development.**

*Action 3 in the Ecosystem-based Management section (pp. 15-16) will make training on EBM principles, best practices, and decision-support tools available to State, Tribal, and local government officials.*

**A range of comments was received concerning the use of the precautionary approach. Many comments supported its adoption while others were concerned it would restrict ongoing or future activities.**

*One of the Policy's guiding stewardship principles provides that decision-making will be guided by a precautionary approach as reflected in the Rio Declaration of 1992, which states in pertinent part, "[w]here there are threats of serious or irreversible damage, lack of full scientific certainty shall not be used as a reason for postponing cost-effective measures to prevent environmental degradation" The United States has long taken the position that precaution is a tool or approach rather than a "principle," given the lack of a single definition or agreed formulation and the differing implications of its various forms. However, it is clear that the precautionary approach does not mandate action or prohibit activities. Application of a precautionary approach as so defined is consistent with the EBM approach and essential for improved stewardship.*

**Some comments expressed concern that potential changes in legislation to incorporate EBM principles into policy and governance are premature without a shared understanding of its meaning and application. EBM efforts should consider broader science-based authorities and regulations of marine resources, in addition to broader consideration of information and interactions.**

*As described above, the Plan provides a definition of EBM for the purposes of implementing the NOP. Any recommendations to seek changes to existing statutory or regulatory authorities—as part of any priority objective – would only be made based upon the experiences of those agencies charged with implementing the Policy. No such changes are mandated by the Policy and it would be premature to suggest any such changes at this juncture. The draft Implementation Plan calls for the NOC Legal Working Group to further analyze these efforts in Action 3 in the Coordinate and Support section (pp. 38-39).*

## OBTAIN, USE, AND SHARE THE BEST SCIENCE AND DATA

**Many comments emphasized the great value of and need for the best data, science, analyses, information, and tools to guide managers and policymakers in evaluating trade-offs and decision support. The Implementation Plan should include actions that focus on better-informed decisions through improvements on the linkage between science and management actions.**

*The Policy places a great emphasis on increasing our scientific understanding. Under the Policy, a fundamental stewardship principle guiding U.S. management decisions and actions affecting the ocean, our coasts, and the Great Lakes is that such decisions will be informed by and consistent with the best available science. Accordingly, numerous actions, milestones, and national objectives set forth throughout the draft Implementation Plan have the specific intent to foster, strengthen, and improve the linkage between science and management actions. Further, the Inform Decisions and Improve Understanding section (pp. 18-25) of the draft Plan outlines actions to sustain and expand the science framework to provide knowledge for improved decision-making and an informed society and workforce.*

**One key to successful implementation of the Policy is to determine the critical science questions that can best inform decisions about emerging and future uses of the ocean, and to focus limited resources on understanding and addressing them.**

*Action 2 in the Inform Decisions and Improve Understanding section (pp. 20-21) focuses on providing the science to support emerging uses of the ocean and Great Lakes, which will increase opportunities for sustainable economic development and new jobs.*

**Many comments emphasized the great need for science-based data, information, and tools to implement the NOP. The foundation for better stewardship must include accurate and timely data and information about the environment and human activities. Active and continuous observations are necessary to obtain these.**

*Actions in the Observations, Mapping, and Infrastructure section (pp. 26-34) address the national need for maintaining and modernizing observing systems, and collecting and delivering data to better support decisions. The Changing Conditions in the Arctic section (pp. 75-84) includes actions to meet the specific observing and data requirements of the Arctic region. These are linked with actions from the Inform Decisions and Improve Understanding section (pp. 18-25) to ensure data and information meet high scientific standards and inform models, assessments, and decisions.*

**Data and information are a high priority for most stakeholder groups, as well as resource managers. Comments from a broad range of sectors expect actions in the Implementation Plan to make Federal data readily available, maintain existing observations and product sources, and provide new data that regions and stakeholders need. Socio-economic and traditional knowledge data and information should be made available and used in addition. Standards for including non-governmental and industry data need to be identified. A number of comments called for a national data and information management system.**

*Providing natural and socio-economic data and information to support management and business decisions is a high priority in implementing the Policy. A national integrated information management system is an essential component of the infrastructure that supports*

*the NOP. The NOC has established a prototype national information management system and portal (ocean.data.gov) as a mechanism to more easily discover and access Federal data and information for use in regional planning. Action 7 in the Observations, Monitoring, and Infrastructure section (pp. 33-34) will develop an integrated data collection, processing, and management system. Data and information will be provided through other actions in the draft Plan. Action 3 in the Coastal and Marine Spatial Planning section (pp. 90-91) provides that by 2015 all of the applicable non-confidential and other non-classified Federal data identified for inclusion will be incorporated into a national information management system and data portal (ocean.data.gov).*

**Several comments urged the development and application of new, efficient, low-cost technologies to assess environmental change across a broad range of spatial and temporal scales, and keep the nation in the forefront of ocean science and technology.**

*Modern observing systems are essential to ocean research and management. Cost-effective and advanced technology sensors and platforms are addressed in the Observations, Monitoring, and Infrastructure section. Actions 2 and 3 (pp. 27-29) focus on developing, testing, and deploying new observing and sampling technologies.*

**A number of comments highlighted the importance of improved seafloor mapping and bathymetry.**

*Coordinating ocean and coastal mapping efforts, improving access to mapping data, and upgrading mapping capabilities and products are the focus of Actions 5 and 6 in the Observations, Monitoring, and Infrastructure section (p. 31-33).*

## PROMOTE EFFICIENCY AND COLLABORATION

**Numerous comments from many sectors called for improved coordination among all levels of government, including with the international community. Federal support for these coordinating activities should be the focus of actions in this Implementation Plan. All levels of government must participate in coordinating and planning, from local to Federal. Tribal governments should be consulted during these coordination efforts.**

*Improved coordination and increased efficiency are key elements throughout the draft Implementation Plan. The focus of the Coordinate and Support section (pp. 35-42) is to coordinate our response to ocean and coastal issues across jurisdictional boundaries and at all levels of governance. The actions are designed to strengthen and leverage partnerships and develop new partnerships. Federal agencies will support regional partnerships through grants, tools, resources, and other services. Agencies will consult with Tribal representatives on relevant activities.*

**The Implementation Plan should clearly define which Federal agencies will be responsible for which actions – both as lead and supporting agencies – and how collaboration between the agencies will be addressed. Lead agencies should be given clear guidance by the NOC on how to incorporate the implementation actions.**

*The draft Plan clearly identifies the Federal agencies responsible for accomplishing each action and milestone. Most milestones include multiple agencies who will work collaboratively to increase efficiencies, leverage resources, and improve the ability to achieve successful outcomes.*

**Several comments recommended that the Plan encourage the use of existing regulations and statutory authorities, and coordinate with them. It should include the promotion of uniform regulations.**

*The Policy emphasizes better coordination of existing authorities and does not impose new regulations. The NOC Legal Working Group will identify gaps, inconsistencies, and duplications in statutory authorities, policies, and regulation, and the NOC will work to reduce barriers to implementing the Policy, per Action 3 of the Coordinate and Support section (pp. 38-39).*

**Much is already known about how to solve problems using existing authorities; what is needed is action. A number of comments expressed concern that the strategic action plan outlines did not identify enough near-term actions. The Implementation Plan must include more concrete and immediate actions with specific timelines for which Federal agencies can be held accountable. More specificity to actions should be provided.**

*The draft Implementation Plan recognizes the need to include specific actions, with well-defined milestones, to establish Federal agency accountability. The draft Plan includes a better balance of near-term actions, to foster timely implementation of the National Ocean Policy. Milestones have been expanded and refined, and the NOC is also determining how to establish performance measures to track progress on actions.*

**Adaptability and flexibility should be built into the implementation of the Policy. The Implementation Plan should be adaptive to regional context and regulatory frameworks.**

*The Policy recognizes as a guiding stewardship principle the need for adaptive management in a coordinated and collaborative approach to respond to environmental, social, economic, and security challenges. The draft Implementation Plan adopts this approach through numerous actions, and affords flexibility in achieving these actions and milestones as conditions change, knowledge is updated, or new issues or uses emerge.*

**More efficient permitting was requested in some comments. Planning needs to ensure that the Federal permitting processes are well coordinated, grounded in standards that provide for changing conditions, and assure protection of the natural and built environments.**

*Action 5 of the Coordinate and Support section (pp. 40-41) will seek efficient, coordinated Federal permitting processes. It will consider ways to save applicants and permitting agencies time and money, and encourage economic investment without compromising public safety, health, and the environment.*

**Numerous comments called for the NOC to pick some priority areas to initiate projects. These comments recommended the use of pilot projects to develop realistic approaches to implementing the Policy, keep initial costs down, and determine approaches to maximize benefits-to-cost.**

*Action 4 in the Ecosystem-based Management section (pp 16-17) will identify and implement pilot projects to demonstrate the practicality of the EBM approach. Pilot projects are proposed elsewhere throughout the draft Plan.*

**Some comments advised that international coordination is required for many ocean, coastal, and Great Lakes issues, noting that some mechanisms for coordination are already in place and should be used.**

*The draft Implementation Plan recognizes the need for international coordination to address many ocean, coastal, and Great Lakes issues, and allows for Federal agencies to work through existing mechanisms as appropriate to achieve the best results. Actions in the Inform Decisions and Improve Understanding; Observations, Mapping, and Infrastructure; Adaptation to Climate Change and Ocean Acidification; and Changing Conditions in the Arctic sections highlight international connections.*

**Some comments recommended that the NOC develop a closer linkage between the actions to address the priority objectives.**

*This draft Implementation Plan builds upon the actions as proposed in the outlines submitted for public comment in June 2011 and, based on comments received, now reflects a more cohesive approach to addressing the nine priority objectives identified by the Policy.*

## **STRENGTHEN REGIONAL EFFORTS**

**Many of the public comments focused on some aspect of regional coordination, planning, and implementation of the Policy. The Implementation Plan should support actions where Federal agencies work with States, Tribes, and regions. Actions should be**

**tailored to regional and local needs and priorities. Planning frameworks need to be national (providing for both horizontal integration across agencies, and vertical integration across levels of government), but adaptable to regional variations.**

*Throughout the draft Plan, the NOC places an emphasis on supporting regional activities and regionally-focused implementation, as appropriate, of the Policy. Five priority objectives include actions with a regional focus: Regional Ecosystem Protection and Restoration, Resiliency and Adaptation to Climate Change and Ocean Acidification, Water Quality and Sustainable Practices on Land, Changing Conditions in the Arctic, and Coastal and Marine Spatial Planning.*

*Many of the actions designed to address these priority objectives build upon the efforts of existing partnerships, priorities, and programs, and are adaptable to local, state, and regional needs. They also cut across the priority objectives to connect national frameworks for science, information management, or coordination, for example, to regional and local actions as varied as restoring coastal wetlands, reducing excess nutrients and sediment in local watersheds, developing climate adaptation strategies for vulnerable coastal communities, minimizing the impacts of harmful algal blooms, and observing and forecasting Arctic sea ice.*

**Actions need to explicitly include integration between Federal agencies and their partners. The Implementation Plan should encourage public/private partnerships and incentivize private-sector cooperation and investment. It should increase collaboration with outreach partners.**

*The draft Plan emphasizes the value of public-private partnerships in leveraging and incentivizing investments. Actions in the Coordinate and Support, Regional Ecosystem Protection and Restoration, and Water Quality and Sustainable Practices on Land sections promote opportunities for public-private partnerships and private investments.*

**Several comments recommended that the Implementation Plan should complement and build on regional activities and successes, existing programs, and pending actions, and not duplicate existing programs and processes. It should reinforce the implementation of existing regional or State management plans, rather than create new management systems. It should take full advantage of the existing resources, capabilities, and knowledge of the myriad organizations that play a role in the management of resources. The NOC should ensure that Federal agencies implement their activities to ensure increased and better coordination between and among these entities.**

*The draft Plan contemplates that Federal agencies will collaborate closely with existing Regional Ocean and Great Lakes Partnerships (ROPs) to apply the most successful approaches in those areas of greatest need. The nine regional planning bodies that will be established under the CMSP Framework provide for State and Tribal membership, and will*



*closely coordinate with existing ROPs. The CMSP Framework provides that the regional planning bodies will build upon the efforts of these existing partnerships. Essential steps of the CMSP require engagement with the public and stakeholders at key steps throughout the process, as well as consultation with scientific, technical, and other experts. The CMSP Handbook called for by Action 2 in the Coastal and Marine Spatial Planning section (pp. 89-90).*

**Several comments addressed the importance of partnerships between the NOC and States and Territories. Actions in the Implementation Plan should be developed and implemented in coordination with the States to ensure that Federal resources address States priorities. The development and implementation of Federal guidance, programs, and protocols should take into consideration existing State and Territorial priorities and protocols. ROPs can help identify the restoration projects of greatest concern in each region.**

*The Federal-State partnership is addressed directly or indirectly in actions for all priority objectives. Action 1 in the Coordinate and Support section (pp. 36-37) will support ROP priorities and facilitate access to information, training, and resources that meet ROP goals. State agency managers and decision-makers will benefit from the information, tools, strategies, and practices developed through actions in the Regional Ecosystem Protection and Restoration (pp. 43-53), and Water Quality and Sustainable Practices on Land (pp. 63-74) sections. The regional planning bodies established by Action 4 in the CMSP section (pp. 91-92) include States as members. In addition, CMSP National Objective 1 (pp. 87-88) notes the need to improve efficiency and coordination across Federal agencies and with States, Tribes, and others.*

**A number of comments emphasized the unique consultative relationship between the United States Government and the Tribal Governments, and the need for this to be reflected in the implementation of the Policy.**

*The draft Implementation Plan addresses the need to work with Tribes in a number of areas. For example, Action 6 in the Adaptation to Climate Change and Ocean Acidification section (pp. 61-62) calls for developing adaptation strategies in consultation with Tribes. Action 5 in the Water Quality and Sustainable Practices on Land section (pp. 70-71) addresses the need for enhancing contaminant monitoring and disease surveillance programs, ultimately producing a government-wide monitoring portfolio that links across States, Tribes, regions, and stakeholders. The regional planning bodies established in Action 4 in the CMSP section (pp. 91-92) include Tribes as members. In addition, CMSP National Objective 1 (pp. 87-88) notes the need to improve efficiency and coordination across Federal agencies and with States, Tribes, and others.*

**Some comments recommended scale-appropriate actions. Planning must initiate sub-regional development with full consideration of local impacts, empowering local coastal communities to care for and nurture the long-term well-being of the coast.**

*The draft Implementation Plan recognizes the importance of working at the local community level to provide resources, information, and projects for sound planning and decision-making. Actions in each of the priority objectives directly or indirectly address this need.*

**Several comments urged the NOC to work within the existing statutory framework, and to complement existing ocean and coastal resources management efforts.**

*As with the importance of engaging at the local level, the draft Implementation Plan recognizes the need to collaborate closely with existing ROPs to build upon existing programs, protocols, and successes, and to apply the most successful approaches in areas of greatest need, including interaction between the existing partnerships and the regional planning bodies that will be established under the CMSP Framework. Actions in each of the priority objectives directly or indirectly address this need.*

**Some comments recommended that the NOC incorporate the Policy and its guiding stewardship principles into agency procedures, rules, and guidance.**

*Federal agencies will implement the Policy consistent with existing legal authorities. Under Action 3 in the Coordinate and Support section (pp. 38-39), the NOC Legal Working Group will identify gaps, inconsistencies, and duplications in statutory authorities, policies, and regulation, and the NOC will work to reduce barriers to implementing the Policy.*

**Some comments endorsed the value of strict regional water quality and sustainable environmental waste management practices, and actions to promote them. A comprehensive approach is needed. Standards should be applied uniformly across similar industry activities.**

*Many of the regional comments refer to specific strategic action plan outlines submitted for public comment in June 2011, which were drafted to address specific priority objectives. Some of these objectives are addressed with a combination of national actions to develop the processes and tools to meet them, and regional activities that will apply those processes and tools on the ground and in the water.*

*A number of programs exist at various levels to address water quality and pollution. The draft Implementation Plan includes actions to coordinate, through existing regulatory and non-regulatory measures, protection and restoration efforts on land and in coastal areas that will enhance water quality. Actions in the Water Quality and Sustainable Practices on Land section (pp. 63-74) will develop consistent water quality standards, identify priority areas,*

*and support and implement projects between Federal, State, and local partners to improve and maintain healthy coastal watersheds.*

**Several comments called for science-based uniform standards for wastewater that are consistently and fairly applied. These standards should be based on the best available data, raise the standards for everybody, and not disadvantage local coastal communities.**

*Action 2 in the Water Quality and Sustainable Practices on Land (pp. 66-67) will enhance water quality in the ocean, along our coasts, and in the Great Lakes by reducing municipal wastewater and other urban sources of water pollution. A collaborative approach at the national level, along with targeted State, Tribal, and regional efforts, will apply national standards to reduce pollutant loadings during the near-term. Pilot projects will promote information sharing about reduction levels, improve water quality at the source and downstream, and increase economic activity in or near urban water bodies.*

**Several comments identified that reducing nutrients and sediment from regional land-based sources should be an area of focus. Increased monitoring is needed. Comments indicate trash debris, particularly plastics, is a major concern.**

*Actions 1 and 2 (pp. 65-67) in the Water Quality and Sustainable Practices on Land section address the major urban and rural sources of excessive nutrients and sediments, as well as toxics and pathogens. These actions will enhance water quality in priority watersheds through a collaborative national approach combined with targeted state and regional efforts. Action 6 (pp. 71-73) will increase research and monitoring of marine debris, to reduce its impacts through cooperative pollution prevention, reduction, and removal efforts.*

**Several comments requested action to strengthen coordination of environmental science, technology, and management of oil production and transportation to avoid unacceptable impacts on water quality and on environmental, wildlife, and human health.**

*The Federal government has a number of ongoing programs and regulations to prevent, prepare for, and mitigate oil spills. These are highlighted in the box on page 64. Agencies also coordinate with industry and international efforts. The Policy will help accelerate these programs and efforts nationally, foster greater cooperation, and help identify priorities.*

**Several comments focused on protecting and restoring ecosystem components on a regional level. An ecosystem protection and restoration plan developed by multi-stakeholders should be the basis for activity by the NOC. It should not place a disproportional burden on the viability of resource-based businesses and local coastal communities.**

*Actions in the Regional Ecosystem Protection and Restoration section address areas where improved coordination between Federal agencies and with non-Federal partners will enhance the effectiveness of conservation programs that will increase the success of these programs at the regional and local levels. Action 1 (p. 46) will institute collaborative partnerships to develop tools to identify land protection and restoration priorities for the Chesapeake Bay watershed, and make these tools available for other regions.*

**Several comments emphasized the need to build upon regional ecosystem projects that are underway across the country. The Implementation Plan should focus on sharing lessons learned, such as identifying successful restoration practices. In addition to existing coastal and Great Lakes activities, the Implementation Plan should identify ecologically important ocean areas for preservation or restoration. Some comments identified the importance of coastal ecosystems, particularly marshes, for carbon sequestration.**

*The draft Plan reflects the NOC's acknowledgement that there are many existing regional restoration and protection projects that support stewardship of the ocean, coasts, and Great Lakes, and their value to inform Federal programs. Action 2 in the Regional Ecosystem Protection and Restoration section (pp. 47-48) will enable Federal agencies to learn from and complement coastal wetland protection and restoration efforts in areas such as the Gulf of Mexico. Action 6 (pp. 51-52) will identify nationally significant ecologically and culturally areas in need of protection. Action 3 (pp. 48-49) focuses on carbon sequestration services provided by coastal habitats.*

**Several comments identified invasive species as an economic and environmental issue in many regions.**

*Action 5 in the Regional Ecosystem Protection and Restoration section (pp. 50-51) provides Federal activities to locate, control, and, where possible, eradicate invasive species in our nation's coastal and Great Lakes waters. This action is broader in scope than that proposed in the strategic action plan outline.*

**Several comments identified the rapidly changing conditions in the Arctic as warranting special focus on this region. Actions should improve forecasts of sea ice change to enable better planning for future human activities. Local coastal communities, which rely on the ocean, request research to improve understanding of the marine ecosystems and the changes that are occurring.**

*The draft Implementation Plan features a series of actions in the Changing Conditions in the Arctic section (pp. 75-84) that specifically address these comments. Actions strive to balance economic growth, community resilience, and environmental stewardship. Concern for the ability to respond to an unintentional release of oil is addressed through Action 1 on improving response management. Actions 2, 3, and 5 provide the observations and science to*

*improve understanding and support operations in the Arctic. Action 2 specifically addresses improving sea ice forecasts. These actions are linked with those in the Inform Decisions and Improve Understanding and Observations, Monitoring, and Infrastructure sections.*

**A number of comments asked for actions to address the full spectrum of activities necessary for resiliency and adaptation in the face of climate change and ocean acidification. These include forecasting impacts, integrating observations, delivering information, assessing vulnerability, developing and evaluating strategies, and implanting on the ground. It is important to define areas of high risk to climate change and to identify sentinel sites to monitor the effects of climate change. The Implementation Plan should recognize that resiliency and adaptation strategies will occur at the local level.**

*The draft Plan features a series of actions in the Resiliency and Adaptation to Climate Change and Ocean Acidification section (pp. 54-62) that specifically incorporate these comments. Actions 5 and 6 support the development and implementation of adaptation strategies that will allow vulnerable coastal communities to adapt and to increase the resilience of ecosystems, societies, and economies to climate change.*

#### OTHER AREAS OF COMMENT

**Several stakeholders recommended that the Implementation Plan should seek economic and environmental balance. This balance was not adequately emphasized in the strategic action plan outlines. The Policy must not create additional, unnecessary barriers to responsible development and use of natural resources. It should develop actions that allow managers to consider all consequences of a decision - economic, environmental, security, and social/cultural.**

*The Policy provides that Federal agencies will “ensure the protection, maintenance, and restoration of the health of ocean, coastal and Great Lakes ecosystems and resources, enhance the sustainability of ocean and coastal economies, preserve our maritime heritage, support sustainable uses and access, provide for adaptive management to enhance our understanding of and capacity to respond to climate change and ocean acidification, and coordinate with our national security and foreign policy interests”. Through a number of actions, the draft Plan clarifies that effective stewardship of our ocean, coastal, and Great Lakes ecosystems is directly tied to a strong national economy, affecting multiple sectors and thousands of jobs in many ocean, coastal, and Great Lakes communities.*

**Many comments recognized the current fiscal climate and expressed concerns about funding programs or diverting resources from existing critical programs and activities. Regions and States need resources targeted to their priority areas.**

*The Policy provides a framework for the improved application of predominantly existing budget authorities across the entire portfolio of Federal ocean and coastal activities. The Implementation Plan will help agencies to structure their ocean and coastal activities to better complement those of other agencies. Action 4 in the Coordinate and Support section (pp. 39-40) will develop a cross-cutting analysis of the Federal ocean and coastal budget to make more efficient and economical use of limited financial resources. While we cannot speak to the details of the FY 2013 Budget at this time, agencies have been instructed to prioritize the Policy in their budgets, such as [ocean.data.gov](http://ocean.data.gov).*

**Several comments raised the importance of ocean education and literacy, including integrating ocean literacy into science education guidelines, and targeting K-12 or early childhood-adult age groups. What tools will the NOC provide the next generation of leaders in terms of education about the oceans and Great Lakes? Educating the public about the pressing issues facing our oceans is vital. Recognize the value of informal education programs in raising awareness, improving the public's abilities to assess risk and trade-offs, and to make informed and responsible decisions based. The NOC should increase collaboration with its aquarium and zoo partners.**

*Actions 5 and 6 in the Inform Decisions and Improve Understanding section (pp. 23-25) focus on developing a skilled workforce and increasing ocean and coastal literacy, respectively.*

## OTHER COMMENTS

A small subset of the public comments received were outside the scope of the draft Implementation Plan or would require changes to the Executive Order or to existing legal authorities, and therefore, are not addressed in the draft Implementation Plan.

Similarly, some of the public comments addressed the Framework for Coastal and Marine Spatial Planning. Action #3 in the Coastal and Marine Spatial Planning section (pp. 90-91) requires the NOC to develop a separate CMSP Handbook. This Handbook will provide further guidance, recommendations, and information intended to support the regional planning process, identify potential ways [ocean.data.gov](http://ocean.data.gov) could enhance regional efforts, and provide more detailed information about visualization and analytical tools and their development to help compare proposed alternatives for future ocean uses. Engaging the public and stakeholders in the CMSP process is essential, and the Handbook will also provide relevant informational guidance, including how to comply with the Federal Advisory Committee Act (FACA). Such information will also assist regional planning bodies in determining how best to engage with certain groups of scientific, technical, and other experts or establish regional advisory councils, as appropriate.

While many of these comments will be addressed by the Handbook, the NOC has determined that the following comments warrant a response as they are tied to the development of the Handbook.

**The planning process must bring everyone to the table through robust public and stakeholder participation. It must provide for significant input opportunities for regional, State and local stakeholders. The process should be regionally flexible.**

*CMSP is inherently a regionally-focused effort. The regional planning body would ensure there is frequent and regular stakeholder engagement throughout all phases of the CMSP process, including development, adoption, implementation, evaluation, and adaptive management phases. To better ensure all concerns and ideas are considered, stakeholder engagement should be emphasized with those most impacted (or potentially impacted) by the planning process.*

*Considerations should also be given to ensuring inclusion of underserved communities. Regions would establish an inclusive and transparent process for stakeholder participation (or, if applicable, utilize an existing process) that ensures engagement with a representative balance of major social, cultural, economic, environmental, recreational, human health, and security interests. The draft Implementation Plan provides for the development of a CMSP Handbook, which will recognize the need for maximum flexibility among the regions, and will provide specific suggestions and recommendations to regional planning bodies to maximize these engagement and outreach efforts.*

**Planning bodies should work with existing regional bodies and structures. There should be a mechanism to get input from industries and economic user sectors.**

*Per the CMSP Framework, an essential step in the CMSP process is the requirement to engage stakeholders and the public at key steps throughout the process. This necessarily includes industries and economic user sections. Further, recognizing that many of these same stakeholders have scientific, technical, and other knowledge relevant to the development of CMS Plans, the CMSP process also requires regional planning bodies to consult with scientific, technical, and other experts. The draft Implementation Plan provides for the development of a CMSP Handbook, which will provide specific suggestions and recommendations to maximize these engagement and consultation efforts, including establishment of regional advisory committees as provided for in the Executive Order.*

**The Administration should clarify that it will not be the purpose of Regional Planning Bodies to override the duties of regional fishery management councils.**

*The Executive Order expressly provides that Federal agencies will implement NOC-certified CMS Plans consistent with existing statutory authority, including the Magnuson-Stevens Act. Regional planning bodies will be established to develop these plans. They do not have any legal*

*authority or mandate that would override the statutory or regulatory duties of any existing entity, including Regional Fishery Management Councils.*

**Several commenters advocated that a formal role for non-governmental stakeholders is needed.**

*The CMSP Framework provides that the regional planning bodies are inherently intergovernmental bodies. The Framework, however, recognizes that substantial and meaningful public and stakeholder engagement is essential to the success of CMSP. Accordingly, essential elements of the CMSP process require engagement with the public and stakeholders throughout the CMSP process, and consultation with scientific, technical, and other experts. Each region has substantial flexibility in meeting these requirements, with options ranging from formal structures such as establishment of a Federal advisory committee (identified as Regional Advisory Committees in the Executive Order) to informal engagement mechanisms. Action 3 in the Coastal and Marine Spatial Planning section (pp xx) calls for the development of a CMSP handbook, which will provide recommendations and guidance to regional planning bodies in meeting these requirements.*