

Nancy Sutley, Chair  
Council on Environmental Quality  
722 Jackson Place NW  
Washington, DC 20006

October 16, 2009

Dear Chairwoman Sutley,

On behalf of the Joint Ocean Commission Initiative, we strongly support the recommendations contained in the Interim Report of the Interagency Ocean Policy Task Force for the important step they represent toward reforming our nation's ocean policies. The leadership and vision provided by the Task Force come at a critical time as we struggle to fulfill our ocean stewardship responsibilities and ensure the sustainability of communities and businesses dependent upon our oceans, coasts, and Great Lakes and the resources and services they provide.

We support the proposed national priority objectives identified in the Interim Report, which capture many recommendations of the U.S. Commission on Ocean Policy, Pew Oceans Commission, and subsequently the Joint Ocean Commission Initiative. It is particularly important that the national ocean policy support an integrated, ecosystem-based approach to management of our ocean and coastal resources. This can only be achieved through improved interagency coordination, support for regional ocean governance efforts, enhanced stewardship of our ocean and coastal assets by federal agencies, and an invigorated marine science and research enterprise. This approach will facilitate better understanding of complex ecosystem processes, guide efforts to assess and minimize cumulative impacts, and focus limited resources on the most effective management strategies. It will also support the communities and economies that rely on healthy ecosystems and safe and sustainable use of ocean resources. In addition, we commend strong recognition in the report of the importance of our oceans to our national and homeland security.

As the Task Force finalizes its recommendations, the Joint Initiative offers the following proposed revisions to strengthen and refine your final recommendations.

### **Strengthening the Interagency Structure**

While the interagency coordination structure recommended in the Interim Report is an improvement over the current system, the Joint Initiative urges the Task Force to recommend that President Obama appoint a National Ocean Advisor within the Executive Office of the President who will provide a single point of strong leadership with the necessary authority to oversee and guide implementation of the national ocean policy. The importance of having a senior executive official who is dedicated solely to guiding implementation of the recommendations of the Task Force — with the support of a small staff — cannot be over-emphasized. The breadth of issues surrounding ocean and coastal policy demands the full attention and accountability of such a leader who can facilitate interagency and intergovernmental coordination and collaboration that are essential to the successful implementation of

the recommendations. This position would complement and support the recommendation to engage the Council on Environmental Quality and Office of Science and Technology Policy in a coordinated effort to implement a national ocean policy.

### **Acceding to the Law of the Sea Convention**

The Joint Initiative encourages the Task Force to further highlight its call for President Obama to aggressively support U.S. accession to the Law of the Sea Convention by urging the Senate to take action. Accession to the Convention is vital to our national security, economic, and environmental interests. A diverse community supports accession, including leaders from our military and national security communities, ocean industries, scientific organizations, and environmental interests. Securing U.S. membership to the Convention and participation on its decision making bodies is particularly urgent given increasing concerns about the impacts of climate change, particularly in the Arctic, a militarily, economically, and environmentally strategic region. We are confident that strong bipartisan support exists for the Convention. However, Senate leaders have clearly communicated that White House leadership is a prerequisite for triggering Committee action and securing necessary floor time for debate. The Joint Initiative urges the Task Force to emphasize the critical importance of this matter to the President in its recommendations. In this instance, there is no substitute for strong Presidential leadership. In addition, the situation further underscores the need for an Ocean Advisor with access to the President.

### **Ensuring Citizen Input**

The Joint Initiative emphasizes the importance of citizen input in the National Ocean Council process and applauds the Task Force for its recommendations to create a Governance Advisory Committee and for identifying a role for the legislatively-established Ocean Research and Resources Advisory Panel. We encourage the Task Force to ensure that adequate opportunities for input are provided to a diverse range of viewpoints as you finalize recommendations to the President. Further we urge continued opportunities for citizen input throughout the implementation process.

### **Strengthening Ocean Science**

While the Interim Report recognizes that marine science is a fundamental backbone for sound ocean and coastal management, the report would be strengthened by calling for an integrated ocean science strategy. Such a strategy should link research activities across federal agencies and incorporate basic and mission-oriented research, observations, monitoring, data management, and modeling, with particular attention to maintaining ecosystem services and human health and well being. An integrated strategy is essential to supporting the development of products, forecasts, and services to help guide policymaking. Language describing the Areas of Special Emphasis related to observations and infrastructure should be expanded to reflect the importance of this relationship, while noting that supporting the construction, deployment, and operation of a comprehensive operational ocean observing system must be a high priority.

The Joint Initiative also recommends strengthening support for regional ecosystem assessments. These assessments will provide a critical foundation for effective coastal and marine spatial planning, regional ocean governance, and allocation of management efforts and resources. They will also be critical for

enhancing the connection between science and management and ensuring that management is adaptive to changing conditions, a matter of increasing urgency as climate change rapidly modifies the world around us.

Finally, we strongly support the Task Force's prioritization of the Arctic. As a poorly understood but critical driver of climate processes, the Arctic is undergoing significant changes that will have enduring global impacts. In particular, increasing access to Arctic living and nonliving resources and summertime ship transit opportunities make this area increasingly vulnerable. Careful attention and additional resources should be dedicated to improving our understanding of the processes driving the unprecedented rate of change in the Arctic and the global ramifications of these impacts. This situation provides a unique opportunity to pursue coastal and marine spatial planning, scaling the effort from the near-coastal waters to the U.S. Exclusive Economic Zone, and finally to include policies to guide activities in international waters.

### **Acknowledging the Economic Benefits of our Oceans**

Reversing the decline in health of our ocean and coastal ecosystems is a key priority for the nation and the Joint Initiative has consistently advocated the need to enhance stewardship of these resources. It is equally important that the national ocean policy and implementation plan recognize and support significant economic benefits that our ocean and coastal resources generate for the nation as a whole and our coastal states and communities in particular. An ocean policy that facilitates the conservation and sustainable use of our natural resources is essential to balancing competing priorities of improving the long term health of the natural systems on which we depend for life and accommodating growing demand for ocean and coastal resources and space required by ocean-dependent industries. Coastal and marine spatial planning is a promising tool to help our nation strike the appropriate balance, and should be rooted in a national ocean policy that recognizes both the ocean's life-sustaining, natural benefits and economic assets that are so essential to ensuring a high quality of life for all Americans.

The Joint Initiative encourages the Task Force to explicitly recognize two important criteria for making informed management decisions that strike this balance, which would benefit from further attention in the report. The first is increased understanding of and accounting for the non-market values of healthy ecosystems and the natural capital and services they provide, as well as the market values, that are more easily quantified but have not been fully assessed. Economic accounting of market and non-market values is becoming increasingly important, particularly in light of the need to develop strategies to address climate change. The report should call for an ocean-focused socioeconomic research program, perhaps identifying it as a cross-cutting priority that will help inform decision making processes for each of the Areas of Special Emphasis.

The second important factor is ensuring comprehensive and accurate assessment of cumulative impacts of human activities on natural systems, including those impacts resulting in increased vulnerability of human populations, identification of critical natural thresholds or tipping points, and development of methods for accounting for these impacts and avoiding these thresholds in decision making. Therefore, the report should further emphasize the need to integrate assessments across the five Areas of Special

Emphasis, perhaps through inclusion of language to that effect in the section of the report entitled *How We Do Business*.

Finally, the call to implement a “precautionary approach” to decision making about the use and conservation of ocean resources is an important element of the Interim Report. As the Task Force considers how to implement this approach, the Joint Initiative urges you to consider the discussion of the precautionary approach included in *An Ocean Blueprint for the 21<sup>st</sup> Century*, the report of the U.S. Commission on Ocean Policy. Proper definition and implementation of this concept is critical for finding the appropriate balance among environmental and economic priorities, and the U.S. Commission on Ocean Policy’s language represents an effort to refine the definition provided in the Rio Declaration.

### **Implementation of the Task Force Recommendations**

In considering implementation of the Task Force recommendations, the final report should emphasize the fiscal and institutional requirements for success. The failure to adequately fund ocean and coastal management, science, and education has resulted in significant limitations in our capacity to understand, monitor, model, and predict how our oceans and coasts are responding to the cumulative impacts of human activities and in our ability to take maximum advantage of a broad range of sustainable economic opportunities. It has also hampered our capacity to implement management strategies that reduce the vulnerability of economically and ecologically important living marine resources, limited access to nonliving marine resources, and increased the vulnerability of coastal communities and businesses to impacts ranging from harmful algal blooms to hurricanes to sea level rise. An investment in ocean and coastal management, science, and education will provide abundant economic and social dividends. Therefore, it is vital that the Task Force recommendations be accompanied by a commitment to develop and support a comprehensive investment strategy, including establishment of an ocean investment fund in the U.S. Treasury. Multiple options exist to capitalize such a fund, including from revenues generated by existing and emerging offshore energy development opportunities and potential carbon-credit revenue streams. We urge the Task Force to give careful consideration to developing a strategy for providing essential, dedicated financial support for the recommendations encompassed in the report.

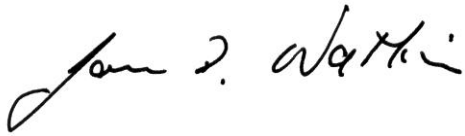
Institutionalizing the recommendations will be essential for success. Effective ocean governance will require a management regime that provides forums and mechanisms for bringing together governmental and nongovernmental entities with responsibility for implementing a new national ocean policy. For this reason, the Joint Initiative urges the Task Force to work toward establishment of the recommended structure through an Executive Order or other enduring administrative authority. Further, it would be advantageous to work with Congress to identify legislative actions that will reinforce and codify the intent behind these executive and administrative actions to ensure their long-term viability.

Our ocean and coastal resources are of critical importance to the American people, all of whom depend on a healthy natural environment and abundant marine and coastal resources for a high quality of life and vibrant national economy. The Task Force Interim Report is an important step toward improved

governance, effective management, and robust science that will be essential for sustaining these benefits into the future.

The Joint Initiative thanks you for the opportunity to provide input into this process, and stands ready to assist you as you continue with this important assignment.

Sincerely,



James D. Watkins  
Admiral, U.S. Navy (Retired)  
Co-Chair, Joint Ocean Commission Initiative



William Ruckelshaus  
Commissioner, Joint Ocean Commission  
Initiative