

Public Comments Received 2/4/2012-2/13/2012

Douglas Tom.....	2
Attachment: Douglas Tom.....	3
Salmon Unlimited, Illinois.....	7
University of South Florida.....	8
Attachment: University of South Florida.....	9
Ed Rhodes	12
Jeff Dubinsky.....	13
Theodore Koboski.....	14
University of South Florida.....	15
Ruth Tighe	16
Theodore Koboski	17

NATIONAL OCEAN COUNCIL

Name: **Douglas Tom**

Organization:

Path: <http://edit.whitehouse.gov/sites/default/files/webform/national-ocean-council.pdf>

Comment:

February 6, 2012

Mr. Michael Weiss
Acting Director
National Ocean Council Office
The White House
Washington, D. C.

Aloha,

Thank you for the opportunity to review and comment on the draft national ocean policy implementation plan. I hope that the final product is a truly collaborative and meaningful plan that equitably takes into account the diverse insular values and needs of the Pacific island community.

I am a Pacific islander, born and bred in the islands and nurtured by a lifetime of learning from *kupuna* and embraced by the spirit of *e malama pono*. As such, my comments have an insular slant toward the surrounding ocean. In addition, my perspective has also been shaped by three and half decades of public service and experience in ocean and coastal planning and management in the islands. Although they might appear to focus on the ecosystem section of the plan, my comments should be construed to apply to the entire plan, inasmuch as everything in the islands is interwoven in a tapestry connecting the ocean, air, and land resources with people and institutions for their governance.

Perhaps to the greatest degree, islanders identify with the ocean. The ocean plays a large part in shaping the environmental, economic, social, and cultural fabrics of the islands and patterns for inhabitation, sustenance, work, play, and inspiration. The ocean is our heritage and its health, our legacy to future generations of islanders. It stands to reason that islanders, likely more than others, better understand and respect the importance of a healthy and productive ocean, and it should come as no surprise that we approach its conservation with a hope for the future.

In our history, as our island populations increased and pushed further inland, our *kupuna* continued to rely on the *mana* given by the creator that blessed us with our island homes, the rich forests of our green valleys, and the rich and diverse bounty of the life-sustaining waters and surrounding ocean. This is why we still view the land as an extension of the sea, and why the *ahupua'a* continues to shape our thinking of our islands as a single ecosystem.

Although the complexities of growth and development brought about changes to insular life, the importance of the ocean to islanders has never waned. In fact, many will argue that its importance is now more pronounced. The task of producing an ecosystem-based plan is complex and difficult, but it is without doubt a pressing challenge to our generation, deserving our nation's best effort.

The national ocean policy statement and formation of the National Ocean Council to produce "the Nation's first comprehensive ocean policy plan," excited many as an overdue national reassessment of the initiatives proposed by the Stratton Commission's *Our Nation and the sea: A plan for national action*. The present effort underscores the importance of healing and nurturing our vital ocean resources and demonstrates the commitment by this generation to protect our Nation's exclusive economic zone. Pacific islanders also view this effort as a means for voicing their concerns regarding insular perspectives, needs, and cultural values that may not have been fully explored in 1969; i.e., given the national attention they deserve that reflects their world view. *The Pacific Way* is part of the cultural fabric of the Pacific island peoples, a matter that is consistently discounted in the federal view when dealing with critical decisions from over 5,000 miles and several time zones to the East. This concept is real and begs the obvious for the inclusion of island worldviews in the national effort.

Having said this, in my view the draft plan represents a continental bias that falls short of addressing Pacific island interests. This raises the nagging question about the U.S. stance on matters germane to the Pacific Basin. For too long, islanders have waited for a clear national vision about the world's largest body of water, but have only been offered scant attention and rhetoric speaking to regional security and the national interest. What is the U.S. view? And, how does the present planning effort relate to it? Responses to these questions and the plan's implications for the future of island communities need to be clearly articulated. For the sake of integrity, they should not be deemed beyond the reach and authority of the Commission. The matter is important to any comprehensive national ocean planning effort.

In order for the plan to be the Nation's first truly comprehensive one for the ocean, it must be the product of collaboration with local partners and fully reflect the ecosystem perspective. Otherwise, it becomes simply rhetoric and more of the patronizing litaney that has historically defined the relationship between the federal government and its Pacific island partners. It has to offer more than a "one shoe fits all" view and needs to be a product from meaningful collaboration. Absent this, the product and process, from the island point of view, become an exercise in imposed irrelevancy. For illustration, I argued for years against the relevancy and use of federal policies, rules, and prescriptions based on the continental sand cell theory in insular areas. It took more than twenty years before the national scientific community openly admitted the irrelevancy. In addition, I also participated in the long fight to defeat the congressional proposal espoused by the U.S. Department of Interior to extend the Coastal Barrier Resources System Act to Hawaii. That law proposed to require the protection and preservation of mangroves. In Hawaii, mangroves are not native and

deemed harmful to beaches, which are clearly more important resources upon which the economy is predicated. For these and other reasons, islands need to be consulted to assure the relevancy of continentally derived recommendations for action.

In concept and practice, sole reliance on federal actions is an incomplete thought that essentially compromises the plan's integrity. Moreover, the plan's omission of the fundamental and inalienable roles and responsibilities entrusted to the states, commonwealths, and territories in caring for the resources and uses of the submerged lands and ocean waters within the extended 12-mile domestic zone, or territorial sea, is distortion of reality and disrespectful. Given its narrowness in focusing on federal actions, except for national security and priority interests consistent with constitutional provisions, the plan's validity can only be tested in the high seas beyond the 12 mile ocean boundary. Therefore, at best, the plan can only be remotely relevant to the expressed public issues and concerns, and it also effectively reduces the ecosystem concept to an afterthought.

The national vision statement is not instructive in guiding specific federal planning, priority setting, and implementation activities. It begs the question regarding how it influences or guides the development and selection of appropriate implementation activities, and the mechanics of how and whether they should be acted upon. Bridging the gap between theory and practice is possible. We ought to support planning goals that promote the collaboration of federal, state, and local partners and the island community if the federal government is to "target its resources to more effectively deliver results for Americans," Inasmuch as the ecosystem concept is about system interrelationships, a nationally proclaimed ecosystem-based ocean plan without contextual collaboration with state and local governments and communities is a contradiction to the activity's stated principles. Unchanged, the outcome will be a product fraught with serious legal and moral issues.

The implication that the federal government is the primary steward of ocean resources is insulting to the island community and paints a gross distortion of the historical values of islanders as *konoiki* of their ocean *kuleana*. It is shocking and unacceptable for the federal government to use the stewardship concept as a political tool for a limited agenda. It is a serious contradiction to the public service doctrine, when the only voice it hears is its own or that of the non-islander. Unless the national ocean policy and planning effort is a true partnership among all levels of government and the community, serious questions will always remain about its recognition of its partners in the American flag Pacific Islands.

Irrespective of its references to culture, the draft plan lacks substance with respect to the "so what" question. Hence, questions persist about how local cultural values and needs will be determined, what they mean, how they will be incorporated into policy or used in interpreting policy, what kinds of implementation actions will be pursued, and how they will be carried out. The importance of understanding and

respecting cultures should not be understated nor overlooked and that a working knowledge of culture can only be obtained through true collaboration with those whose lives are culturally defined. The alternative of relying on existing literature and “comfortable” academic perspectives would be an injustice to local peoples and their cultures. Personally, I have witnessed unsettling episodes where popular and inappropriate rhetoric about insular life have been used by newcomers and self-serving interests to inaccurately characterize the island view.

Cultural values are primary determinants for how societies see and deal with change and the challenges of the future. In multi-ethnic societies, people learn to acknowledge and respect the different values and customs and are more apt to collaborate toward mutually beneficial goals and develop mutually agreed upon frameworks for identifying, understanding, assessing, and solving problems and issues. This is most pronounced in insular environments, and it exists at the core of the Pacific Way.

Should the plan be neglectful of the voices raised by the Pacific island community in its development of the policies and mechanisms for implementation, little of any substance can be accomplished. Clearly, this aspect requires more thought, and effective provisions to assure implementation must be developed and incorporated into the plan to provide the needed framework for determining what can be realistically expected and accomplished in sustaining the ocean’s health and values.

In closing, I reiterate that like other islanders I wholeheartedly support a comprehensive national ocean policy plan that effectively responds to the intent and purpose of the national ocean policy statement. However, the draft is contextually and procedurally inconsistent with the ecosystem perspective and falls short of responding to the national policy statement. Extensive substantive and collaborative improvements are necessary which are based on the ideal of helping the National Ocean Council produce an effective national plan that acknowledges and also respects and responds to insular values, needs, and cultures. I hope that my comments will be received and seriously considered with that in mind. As with other Pacific islanders, I look forward in anticipation that the final plan will be something that we all can be proud of and advance the nation’s goals in collaborative, place-based stewardship of our ocean ecosystem.

Mahalo,



Douglas S.Y. Tom

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Honolulu, Hawaii 96813

e-mail: doug8899@yahoo.com

NATIONAL OCEAN COUNCIL

Name: **Phillip Banks**

Organization: Salmon Unlimited, Illinois

Path:

Comment: Please put public access for recreational fishing as a top priority when considering the plan.
Thank you

NATIONAL OCEAN COUNCIL

Name: **Frank Muller-Karger**

Organization: University of South Florida

Path: http://edit.whitehouse.gov/sites/default/files/webform/nop_comments_by_frank_muller-karger.doc

Comment:

NOP Comments by Frank Muller-Karger
University of South Florida
carib@marine.usf.edu / 727-776-3759

in general –

I found that the document is not really centered on developing the strong partnerships between government, academia and industry that this country needs to sustain success in science and science-based management. The document is primarily focused on federal agencies (those are the ones listed in each instance at the end of each section to lead action). We need to break out of this culture – in many cases academia can do much that agencies don't do. The historical model that agencies simply incorporate and internally duplicate what academics do, or what private industry can do, is not viable. All efforts should be focused on such partnerships.

The role of the states is also not clear in this NOP.

EBM section:

Action 3: building capacity should have a broader scope than training on EBM principles and best practices, or having outreach programs on EBM. There is a basic need to close the loop between government, academic researchers and educators, and industry. Two core elements here are education in STEM topics (at all levels G-16/continuing education), and establishing communications/education links between researchers and managers so each community understands the needs of the other.

General:

Connecting EBM and Inform Decisions and Improve Understanding
Inform Decisions and Improve Understanding / Action 3

Ocean Observing. I would like to recommend that the management, oversight, and science strategy implemented in the NSF OOI model be adopted to implement the IOOS model. The present IOOS management and science strategy is not functional and will continue to devolve into poor science.

The US Commission on Ocean Policy emphasized IOOS as one element of regional governance and developing regional assessments. However, the IOOS has not been implemented properly. A positive thing is that other regional compacts have developed focused on governance. However, a more robust mechanism needs to be implemented (and quickly) to support better regional science in the service of EBM. Some specific problems with IOOS. Of particular concern is that the governance and funding processes have become corrupted. Specifically:

- The regional associations (RA) have been constituted with the prime objective to perpetuate their own existence, rather than to provide a service to the region and the nation. Some of the RAs have this explicitly in their bylaws.

- The vast majority of the IOOS budgets has been consumed, and continues to be steered, toward support of the administrative staff for RA offices. This is a corruption of the concept of regional observing. If we have 8 RA's and each consumes close to \$1M per year in administration when overall budgets are stressed, the whole purpose of an 'ocean observing system' has been diluted.

- there is minimal data coordination and scaling of products to span various RA's. This is actively opposed by some if not all regional association members – this is driven by the desire for control of resources within each RA.

-Each RA has a board of directors that prescribes and selects what groups will receive funding. The board and the review process is skewed to support themselves or the same groups that have supported the RA process from the beginning.

-The process continues to be dominated by an academic group with interests that are not aligned with management objectives.

(I could go on – the point is IOOS does not work. My suggestion is that NOAA save the funds dedicated to the administration of the regional Associations and have open calls for proposals that are screened through a robust and credible peer-review system. This puts the money where it should be – in the science and in linking applications and science. NOAA should also ensure that products are scaled properly for the nation/region and are consistent across regions. There should be a very strong link between the NOAA, NSF, NASA, EPA, USGS – and NAVY- management of science and observations. The funds spent on "IOOS" should be managed through a peer-review process through an entity that understands national priorities, and how regional issues fit in this national priority.)

Inform Decisions and Improve Understanding / Action 5:

This very explicitly needs to include remote sensing (design and use of satellites for ocean observation, understanding calibration and validation, understanding ocean science, developing applications using in situ and remote sensing observations)

Action 5: we need student support across the board, including everyone (but not 'particularly focused' on under-represented groups). We need to get everyone working on this and educated.

Observations, Mapping, and Infrastructure

Action 2: Improve unmanned and satellite remote sensing systems

This section focuses on "existing" assets. The problem is that our nation is losing ground very fast in this area. Our satellite systems are old (designed 20 y ago), we have no launch capabilities for mid-size satellites (indeed a disaster!), and we have no vision or mechanism to implement an Earth-observing constellation of satellites. This is the ONLY way that we will have synoptic, local to global observations, 24/7. We CANNOT depend on foreign satellites – yet we have been delegating this technology to China, India, etc. We are blind in our vision to look at Earth from space. Our NOP needs to be very strong in its effort to get us eyes in space ASAP. We know the baseline set of measurements we need based on over 30 years of research. We now have less capability than we did during the latter part of the 1990's and early 2000's. We should have this basis for observations and build infrastructure to enhance observations, but be based on this as a foundation available for daily global observations.

Action 4: Provide local and regional observation systems to support a variety of ocean, coastal, and Great Lakes users

(See my comments above on IOOS: deconstruct the present IOOS and reconstruct along the OOI model. The OOI model needs to be improved as well, with regular 3-5 year recompletes. The program needs to be managed by NOAA, not by regional associations where the proverbial fox is managing the henhouse).

Coordinate and support:

In my view, the international dimensions of the NOP are not highlighted strongly enough. It appears in some bullets in collaboration here and there prior to this section. In addition to "Federal, State, Tribal, regional, and local ocean, coastal and Great Lakes programs" there should be explicit international links throughout the document. Even in this section it is buried in Action 6. Understanding the international social / economic dimensions of ocean dynamics and resource management is critical to our own national security. We should lead internationally.

Most bullets under Regional Ecosystem Protection and Restoration
And
Regional Ecosystem Protection and Restoration
And Arctic section
And CMSP section
Should include NASA and agencies with remote sensing capabilities

Name: **Ed Rhodes**

Organization:

Path:

Comment: I am taken by the hypocrisy of the broad statement at the top of the document that narrows America's "stewardship" to only "ocean stewardship". If our stewardship included being global stewards, not just ocean stewards, we would be dealing effectively with the human causes of climate change and not have to rely on the measures outlined in the section "Resiliency and Adaptation to Climate Change". If we go back to the top statement one of the most important things we should be doing to "ensure that the ocean, our coasts, and the Great Lakes are healthy and resilient, safe and productive" is address climate change and work to dramatically reduce greenhouse gas emissions.

I realize that there were bounds put on the scope of the ocean plan and that climate change in the U.S. is highly political, but I think it spineless not to indicate early in the discussion on the impacts of climate change that the most important thing we can do is address human activities that are causing it. Then you can get on with measuring, monitoring, mitigating and adapting. But if we had been responsible stewards of our environment earlier, this section would not have been necessary.

Name: **Jeffrey Dubinsky**

Organization:

Path:

Comment: Dear Chairs Sutley and Holdren and National Ocean Council Members:

The recently released Draft National Ocean Policy Implementation Plan is a giant step forward in advancing the National Ocean Policy and helping to create healthier oceans and coasts and stronger economies for our coastal communities. The Plan shows great strength in providing a cohesive framework for National Ocean Policy implementation and being an action-oriented plan that provides for government accountability. As you move to finalize this plan, please consider the following recommendations:

Protecting, maintaining and restoring the health of our oceans, coasts and Great Lakes must be of primary importance with an emphasis to achieve conservation milestones that can provide immediate ecological benefit such as the protection and restoration of coastal and marine habitat for priority species;

- Ensure the plan does not overlook needed new actions and does not only propose existing government plans and programs;

- Produce an implementation status report every two years that notes progress on reaching ecological indicators and the actions and milestones in the Plan; and

- Fully utilize existing legal authorities to implement the National Ocean Policy.

The National Ocean Council should also prioritize needed funding for regional ocean partnerships in those regions which are best prepared to begin regional planning bodies and convene stakeholder participation. Regional ocean partnerships can create the best value of scarce federal funding by bringing federal, state, tribal, scientific and non-governmental entities together to start to address ocean management challenges.

The National Ocean Policy is founded on sound science, an inclusive and transparent public and stakeholder engagement process, the protection of habitat and wildlife populations, and encourages government at all levels to work together. The Draft Implementation Plan reflects over two years worth of hard work, investment and commitment made by state governments, commercial and industrial ocean users, universities and scientists, 27 federal agencies and departments and tens of thousands of citizens across the country to move our oceans toward better ocean management. I urge the National Ocean Council to operationalize the National Ocean Policy as soon as possible through this Implementation Plan with the goal of creating the enduring environmental stewardship of our ocean, coastal and Great Lakes ecosystems.

Name: **Theodore Koboski**

Organization:

Path:

Comment: This plan is a solid strong plan that touches on major cornerstones to successful ocean management. My only comment is STICK BY THIS PLAN. Lawmakers and lobbyists will try and dismantle the most integral parts of this plan in order to achieve their own selfish goals. This administration has come across as soft and intimidated. It is up to the federal agencies and President Obama to protect the priceless resources of America, especially those of our oceans. I beg of you, please make sure this plan is seen through to the end with minimal alterations.

Name: **Frank Muller-Karger**

Organization: University of South Florida

Path:

Comment: Please note that there are two sections that should be rescoped and re-titled. Specifically, the sections:

Resiliency and Adaptation to Climate Change and Ocean Acidification. The NOP strategy and implementation plan should recognize that ocean acidification is but one more expression of climate change, similar to sea level, temperature, weather patterns, etc. etc. - ocean acidification should NOT be highlighted any more than these other changing variables! This section title should therefore NOT single out ocean acidification as a larger problem than the other ones. This gives the wrong impression, creates a sense of misinformation, or if anything of misplaced attention while ignoring other issues. It seems to be an effort to create a bandwagon on a single process when we need to address the complement of many processes changing at the same time, including interactions between them.

Changing Conditions in the Arctic. The Arctic is only ONE region of the globe that is changing. There are very serious, rapid, and very significant changes occurring in the tropics over the past several decades - these are just as measurable as those in the Arctic. These have great impacts on habitats, productivity and diversity of the tropics. The same is true for mid-latitudes! These are NOT any less important than those in the Arctic. We need to recognize and emphasize studies, science, education, and address all areas - it is a mistake to simply focus on the Arctic. Tropical environment changes carry serious social and economic threats and implications. Please retitle this section and expand to recognize changes 'everywhere' and not simply and only in the Arctic. This is shortsighted, and again carries a sense of misinformation.

thank you
Frank

Name: **Ruth Tighe**
Organization: private citizen, retired
Path:
Comment: To: Members, National Ocean Council
from: Ruth L. Tighe
Re: National Ocean Policy Implementation Plan
Date: 2/06/2012

Dear Council Members,

Thank-you for the opportunity to comment on the newly released National Ocean Policy Implementation Plan. I speak as a concerned elder citizen, who has resided on a small island in the Pacific - Saipan, part of the Commonwealth of the Northern Mariana Islands - for 31 years. Being ever present, the ocean is not some abstract concept, but a very real and significant part of my surroundings, my paradigm, if you will. My comments reflect that perspective.

☐

It is disappointing, to say the least, that despite the teachings of renowned scholars such as Callum Roberts, author of "The Unnatural History of the Sea," who writes of the importance of the oceans to the health of the entire world, the authors of this paper have no such weltanschauung, or world view. The oceans, covering 71% of the earth, are a major factor, play a significant role, in every part of life on earth - not only life in the countries it borders, not only life within its deeps, but life throughout the mega-ecosystem that constitutes life on this planet.

Yet acknowledgment of this global reality is not to be found anywhere in the pages of this document. Instead, there is the chauvinistic view that the function of the oceans are, according to the National Ocean Policy vision statement, to "promote the well-being, prosperity, and security of present and future generations [of Americans]."

National objective #1 states, in part, " Efficient regulatory processes are essential to preserve and enhance sustainable use of the ocean, coasts, and Great Lakes [by the U.S]."

The paper's conclusion states, "...the oceans, coasts, and Great Lakes are a crucial resource for America and they are in trouble."

All of that may very well be true, but the oceans do not exist merely, or solely, to provide "sustainable uses" to the U.S. They are the major component of the world's eco-system. Their health and well-being are crucial to survival of the entire planet. For the oceans to continue to be viable, it is necessary that they be protected from abuse and misuse, and that their health, the richness of their resources, the purity of their waters be preserved - and indeed restored - to the maximum extent possible.

Yet none of this is reflected in this statement of the national ocean policy of one of the most powerful countries in the world.

I find this appalling.

Name: **Theodore Koboski**

Organization:

Path:

Comment: This plan is a solid strong plan that touches on major cornerstones to successful ocean management. My only comment is STICK BY THIS PLAN. Lawmakers and lobbyists will try and dismantle the most integral parts of this plan in order to achieve their own selfish goals. This administration has come across as soft and intimidated. It is up to the federal agencies and President Obama to protect the priceless resources of America, especially those of our oceans. I beg of you, please make sure this plan is seen through to the end with minimal alterations.