WEST COAST GOVERNORS' AGREEMENT on OCEAN HEALTH
CALIFORNIA OREGON WASHINGTON

October 15, 2009

Interagency Ocean Policy Task Force
White House Council on Environmental Quality
722 Jackson Place, NW
Washington, DC 20503

Dear Interagency Ocean Policy Task Force:

The West Coast Governors' Agreement on Ocean Health (WCGA) commends the Interagency Ocean Policy Task Force (Task Force) for your efforts in creating an Interim Report outlining a National Ocean Policy. Your proposed policy, framework, and implementation strategy align well with the goals and visions of the WCGA. We applaud your recognition and support of regional governance as we believe that regional partnerships are the future direction for effectively and efficiently implementing marine policy. Engagement and financial support by the federal government will enable these regional efforts to be highly successful.

We thank the Task Force for including some key items that we requested in our initial comments (July 23, 2009). In particular, we appreciate the proposed Ocean Governance Framework which emphasizes greater participation by State, tribal, and local authorities, and regional governance structures. We fully support the establishment of an Advisory Committee that would include a WCGA representative to provide input on inter-jurisdictional issues to the National Ocean Council. In addition, we encourage federal agencies to coordinate and consult with individual states and tribes.

We applaud your proposed policy principles that call for management that is ecosystem-based, adaptive, guided by the precautionary approach, and aimed at minimizing cumulative impacts. Your implementation strategy framework includes a number of priorities that are highlighted in our previous letter to the Task Force and in the WCGA Action Plan. For instance, we thank you for including climate change as an area of special emphasis under your priority objectives, as preparing for climate change is also a priority for the WCGA. Additionally, like the Task Force, the WCGA believes in the value of marine spatial planning (MSP), particularly on a regional level. One way the WCGA envisions using MSP is to guide offshore renewable energy siting. We appreciate the Task Force recognizing it as an approach to balance competing uses, including emerging issues such as energy development. We understand that you are interested in identifying a framework for MSP, an issue we are currently examining closely, and we will provide you with our comments on this in a subsequent letter.

As indicated in our Action Plan, the WCGA also supports a number of issues that were noted in the Interim Report but were not included in our initial comments to the Task Force, including: 1) enhancing water quality in the ocean and along coastlines; 2) acknowledging the important role of long-term ocean observing systems in ocean management; and 3) adapting to ocean acidification and supporting greater research on its effects.

Finally, we would like to reiterate some of our comments that were not included in the Interim Report, which we hope you will reconsider:

1. **Recognize importance of and support reauthorization of a strengthened Coastal Zone Management Act.** While we appreciate your support for legislation that calls for joining the Law of the Sea Convention, we had hoped that you would also recognize the importance of the U.S. Coastal Zone Management Act by supporting the reauthorization of a strengthened statute as supported by the 35 member Coastal States Organization and other stakeholders throughout the nation. Existing state programs and authorities provide valuable, on-the-ground experience in addressing the challenges of managing our coasts. State programs provide a strong, existing mechanism for implementing the National Ocean Policy, but require a commitment by leadership to renew the law and adequately fund these efforts.

2. **Adequately and equitably fund all regional ocean partnerships.** In the proposed policy coordination framework section of your Interim Report, you included a brief paragraph on creating a budget for the implementation of a National Policy (page 20). We would like to emphasize that regional partnerships are an effective and efficient way to manage the nation's oceans and coasts, but in order to be successful in this endeavor, adequate funding for the regional organizations and their federal partners is critical. The WCGA strongly believes that in order to implement a National Ocean Policy, funds need to be equitably distributed among the six Regional Ocean Partnerships (ROPs) that now represent the Great Lakes and every coastal region of the contiguous United States. To date, the WCGA has established outstanding partnerships with federal agencies and has received financial support from them for specific activities, but we have not received direct appropriations of federal funds. Recently, the ROPs developed a proposal for *Regional Implementation of the National Ocean Policy*, which suggests a model for allocating funds to support regionally-focused efforts aimed at characterization and assessment, planning, implementation, and monitoring of coastal and marine environments.

Once again, we commend your efforts and successes in creating a draft National Ocean Policy, coordination framework, and implementation strategy. Thank you for considering our comments in producing the Final Report of the Interagency Ocean Policy Task Force. We hope that the National Ocean Policy will serve to both streamline current policy and move quickly and firmly toward on-the-ground implementation. We look forward to working with the Task Force in the future to improve ocean and coastal management.

Sincerely,

Brian Baird Assistant Secretary for Ocean and Coastal Policy, California	Jessica Hamilton Keys Natural Resources Policy Advisor, Office of Oregon Governor Kulongoski	Bob Nichols Executive Policy Advisor, Office of Washington Governor Gregoire