

November 4, 2004

Public Comments on Final Report
Interagency Ocean Policy Group
White House Council on Environmental Quality
722 Jackson Place, NW
Washington, DC 20503

Dear Members of the Interagency Ocean Policy Group:

On behalf of the member organizations of the Ocean Policy Project, we write today with comments regarding the *Final Report: An Ocean Blueprint for the 21st Century (Pre-Publication Copy)*, released by the U.S. Commission on Ocean Policy on September 20, 2004.

The Final Report describes the need for a National Ocean Policy Framework in order to reform our current governance approach. Two components are key to making the framework effective: 1) unifying the federal government under a national ocean policy, and 2) strengthening the federal government's structural mechanisms for coordination and implementation of the national policy. We recommend that the Administration take immediate action on the following steps to improve ocean governance.

1. Advance a coordinated, comprehensive national oceans vision by establishing and implementing an Executive Order that makes oceans conservation a national priority by:
 - a. Establishing a national oceans policy to protect, maintain, and restore the health of marine ecosystems.
 - b. Establishing a high-level mechanism for coordinating planning and decision-making regarding government-wide application of the new national oceans policy.
2. Provide the National Oceanic and Atmospheric Administration (NOAA) with a policy mandate that makes ocean conservation an agency priority. Among other actions, we suggest that the Administration propose a policy stating that *"agency actions that may significantly harm ocean waters or ocean resources will not be permitted unless and until it is demonstrated that the action, individually or in combination with other actions, will not significantly harm a marine ecosystem, nor impede its restoration."*

Ocean governance reforms are critical to improving ocean health. Our ocean governance system, with over 20 federal agencies administering over 140 federal oceans-related laws, is disjointed and has failed to account for the many competing interests. Multiple threats, such as polluted runoff, coastal development, and overfishing, continue to cause declines in ocean health and impact the ocean-derived economy. Threats to ocean health do not operate in isolation nor are they confined to jurisdictional boundaries in marine and coastal environments. We need a comprehensive and coordinated system of federal and state laws that will advance a shared national vision for improving ocean health.

As members of the Ocean Policy Project, we appreciate this opportunity to provide input regarding the Final Report and we look forward to working with you to address these critical governance reforms.

Sincerely,

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