



National Federation of Regional Associations for Coastal and Ocean Observing

205 Oakledge Rd
Harpswell, ME 04079

March 28, 2012

Josie Quintrell
Executive Director

Ms. Nancy Sutley, Dr. John Holdren, and Members
National Ocean Council
c/o Council on Environmental Quality
722 Jackson Place, NW
Washington, DC 20503

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Re: Comments on Draft National Ocean Policy Implementation Plan

Dear Chairs Sutley, Holdren, and Members of the National Ocean Council:

I am pleased to submit the following comments on behalf of the Board of Directors of the National Federation of Regional Associations for Coastal and Ocean Observing (NFRA). NFRA is a non-profit organization formed by the 11 IOOS Regional Associations (RA) to provide a common voice for regional coastal observing.

We appreciate the opportunity to provide comments on the Draft National Ocean Policy Implementation Plan as addressing the key issues facing our oceans, coasts and Great Lakes will depend on collaboration among all levels of government, private industry, NGOs and stakeholders. We hope the following comments are helpful to your efforts.

I. Overall comments:

The National Ocean Policy (NOP) sets the overall a framework for addressing critical ocean, coastal and Great Lakes issues. Our hope was that the Implementation Plan (Plan) would contain more specific action steps for how existing programs could be leveraged and integrated across agencies and at all levels of government to address the NOP. While progress has been made in this direction, many of the actions and milestones are program-specific and do not link together existing efforts into a comprehensive plan.

All of the priority objectives mention the need for improved monitoring/observations, modeling, data management and the development of decision support tools at the regional level. This critical infrastructure should be identified in the Implementation plan as a fundamental need for implementing the National Ocean Policy.

Similarly, many sections stress the importance of a regional approach to these issues. The Plan should put forth a plan for how the federal government can effectively work with regional entities including existing and planned Regional Ocean Partnerships, the IOOS Regional Associations and the regional offices for federal agencies. These efforts are mentioned individually but not as part of an overall strategy.

Honorary

- Braxton Davis, *The Coastal States Organization*
- Nancy Colleton, *The Alliance for Earth Observations*
- Vice Admiral Paul Gaffney, II (retired), *Monmouth University*
- Mark Luther, *Alliance for Coastal Technologies*
- Scott Rayder, *Computer Sciences Corporation*
- Emily Woglom, *The Ocean Conservancy*





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Finally, the plan fails to mention the critical role that non-federal partners (universities, NGOs, states, tribes, IOOS Regional Associations (RAs), etc) can and should play in implementing the NOP. This is a missed opportunity. Almost all federal agencies benefit from these partnerships, through the results of research, expertise, leveraging of assets or the implementation of management programs. For example, the IOOS regions are a powerful tool for obtaining and disseminating ocean information through a stakeholder-driven process. A stakeholder driven process is actually required by the IOOS authorizing legislation, The Integrated Coastal and Ocean Observation System Act of 2009 (ICOOS Act), in Sec. 12304(c)(4)(A). The regions are also a model for promoting efficiency and collaboration between data users, data providers, and separate federally-funded programs. The Implementation Plan should clearly indicate the role such partnerships will play in the successful implementation of the NOP.

II. Specific Comments on the Observation, Mapping and Infrastructure Section.

Many of the implementation strategies mentioned for Action 4 of the “Observations, Mapping and Infrastructure” objective focus on the implementation of the ICOOS Act. These actions are already being addressed by the U.S. IOOS Program Office. The National Ocean Policy Implementation Plan should identify new actions that IOOS and its partners should take to implement the NOP.

Many of the milestones include inventories or assessments. While these are important program steps that document baselines, they should not be used as milestones. Milestones should refer to the outcomes of specific actions. As a user-driven system, the milestones should relate to the delivery of information to decision-makers.

We recommend the milestones be revised to include the following actions:

- 1) The development of a national subsurface observation plan that would provide operational observations in the water column to support climate monitoring, ecosystem-based monitoring/decisions and the Arctic. This plan should be developed by experts from both federal agencies and IOOS RAs as well as nationally-recognized experts. The plan would examine the need for fixed assets such as buoys and mooring as well as the use of automated underwater vehicles such as gliders.
- 2) The development of a strategic plan for how U.S. IOOS can best address the need for operational biological observations, in the context of what is currently being done or planned for by other federal agencies.
- 3) The development of a working group comprised of operational modelers from federal agencies and IOOS regional modelers to determine how the regional scale models supported by IOOS regions can be integrated into federal efforts and expanded to address the needs identified in this Plan for ecosystem models and climate models.





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III. Resiliency and Adaptation to Climate Change

The Plan calls for the creation of “Sentinel Sites” (p. 55) for monitoring climate change. Regional IOOS is one of the few programs that have operational subsurface monitoring capacity linked to the federal data management system. A ten-year dataset from the Gulf of Maine has demonstrated that the change in water temperatures and other properties varies throughout the water column (NERACOOS, 2012). Sea surface temperature is a valuable measurement but is not a substitute for water column measurements that reveal how physical changes are affecting ecosystem changes.

Page 58 calls for the development of regional-scale models and projections. All 11 IOOS RAs are supporting regional scale modeling, including the development of coupled models to link changes in physical, chemical and biological parameters. This milestone should build on these efforts, as well as those already underway in federal agencies.

Thank you for the opportunity to provide comments. We are happy to answer any questions you may have and look forward to working with the NOC on implement the nation’s first National Ocean Policy.

Sincerely,

Josie Quintrell,
Executive Director, NFRA

