

Participating Organizations

Alliance for a Living Ocean
American Littoral Society
Arthur Kill Coalition
Asbury Park Fishing Club
Bayberry Garden Club
Bayshore Regional Watershed Council
Bayshore Saltwater Flyrodders
Belford Seafood Co-op
Belmar Fishing Club
Beneath The Sea
Bergen Save the Watershed Action Network
Berkeley Shores Homeowners Civic Association
Cape May Environmental Commission
Central Jersey Anglers
Citizens Conservation Council of Ocean County
Clean Air Campaign, NY
Coalition Against Toxics
Coalition for Peace & Justice/Unplug Salem
Coast Alliance
Coastal Jersey Parrot Head Club
Communication Workers of America, Local 1034
Concerned Businesses of COA
Concerned Citizens of Bensonhurst
Concerned Citizens of COA
Concerned Citizens of Montauk
Concerned Students and Educators of COA
Eastern Monmouth Chamber of Commerce
Fisher's Island Conservancy
Fishermen's Conservation Association, NJ Chapter
Fishermen's Conservation Association, NY Chapter
Fishermen's Dock Cooperative, Pt. Pleasant
Friends of Island Beach State Park
Friends of Liberty State Park, NJ
Friends of the Boardwalk, NY
Garden Club of Englewood
Garden Club of Fair Haven
Garden Club of Long Beach Island
Garden Club of RFD Middletown
Garden Club of Morristown
Garden Club of Navesink
Garden Club of New Jersey
Garden Club of New Vernon
Garden Club of Oceanport
Garden Club of Princeton
Garden Club of Rumson
Garden Club of Short Hills
Garden Club of Shrewsbury
Garden Club of Spring Lake
Garden Club of Washington Valley
Great Egg Harbor Watershed Association
Green Party of Monmouth County
Green Party of New Jersey
Highlands Business Partnership
Holly Club of Sea Girt
Hudson River Fishermen's Association
Jersey Shore Captains Association
Jersey Shore Parrot Head Club
Jersey Shore Running Club
Junior League of Monmouth County
Keypoint Environmental Commission
Kiwanis Club of Manasquan
Kiwanis Club of Shadow Lake Village
Leonardo Party & Pleasure Boat Association
Leonardo Tax Payers Association
Main Street Wildwood
Mantoloking Environmental Commission
Marine Trades Association of NJ
Monmouth Conservation Foundation
Monmouth County Association of Realtors
Monmouth County Audubon Society
Monmouth County Friends of Clearwater
National Coalition for Marine Conservation
Natural Resources Protective Association, NY
NJ Beach Buggy Association
NJ Commercial Fishermen's Association
NJ Environmental Federation
NJ Environmental Lobby
NJ Main Ship Owners Group
NJ Marine Education Association
NJ PIRG Citizen Lobby
Nottingham Hunting & Fishing Club, NJ
NYC Sea Gypsies
NY State Marine Education Association
NY/NJ Baykeeper
Ocean Wreck Divers, NJ
PaddleOut.org
Piscataway Saltwater Sportsmen Club
Raritan Riverkeeper
Religious on Water
Riverside Drive Association
Rotary Club of Long Branch
Rotary District #7510—Interact
Saltwater Anglers of Bergen County
Sandy Hook Bay Anglers
Save Barnegat Bay
Save the Bay, NJ
SEAS Monmouth
Seaweeders Garden Club
Shark Research Institute
Shark River Cleanup Coalition
Shark River Surf Anglers
Shore Adventure Club
Sierra Club, NJ Shore Chapter
Sisters of Charity, Marie Stella
Sons of Ireland of Monmouth County
Soroptimist Club of Cape May County
South Jersey Dive Club
South Monmouth Board of Realtors
Staten Island Tuna Club
Strathmere Fishing & Environmental Club
Surfers' Environmental Alliance
Surfrider Foundation, Jersey Shore Chapter
TACK I, MA
Terra Nova Garden Club
Three Harbors Garden Club
Unitarian Universalist Congregation/Monm. Cnty.
United Boatmen of NY/NJ
Village Garden Club
Volunteer Friends of Boaters, NJ
WATERSPIRIT
Women's Club of Brack Township
Women's Club of Keypoint
Women's Club of Long Branch
Women's Club of Merchantville
Women's Club of Spring Lake
Women Gardeners of Ridgewood
Zen Society



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September 30, 2009

**Interagency Ocean Policy Task Force
c/o Ms. Nancy Sutley, Chairwoman
White House Council on Environmental Quality
722 Jackson Place
Washington, DC 20503**

Re: Marine Spatial Planning and Emerging Issues for the Oceans, Our Coasts, and the Great Lakes

Dear Chairwoman Sutley and members of the Interagency Ocean Policy Task Force:

Clean Ocean Action (COA) is a regional, broad-based coalition of 125 conservation, environmental, fishing, boating, diving, student, surfing, women's, business, service, and community groups with a mission to improve the degraded water quality of the marine waters of the New Jersey/New York coast. To be clear, these comments are focused on efforts that will eliminate or reduce ocean pollution sources.

For over 25 years, COA has been actively engaged in ocean management to ensure a vibrant, diverse, economically robust ecosystem. From successfully closing eight ocean dumpsites, to forestalling offshore drilling and stopping strip-mining vast ocean regions, citizens have worked hard to ensure a clean ocean economy.

Most recently, we have been actively engaged in the national Outer Continental Shelf (herein the "OCS") energy development discussions and have provided extensive comments on several energy projects proposed off the New Jersey coastline, including three commercial-scale wind facilities, three liquefied natural gas facilities and oil/gas exploration and development. COA was also instrumental in developing the federal Clean Ocean Zone legislation, set to be introduced in the U.S. Congress by our New Jersey legislators, which includes important marine spatial planning principles. We previously submitted our recommendations to the Interagency National Ocean Policy Taskforce (herein the "INOP") for ensuring an effective and protective national policy based on best-available, scientifically-valid information, including important actions that are required to support this policy, which includes ecosystem-based management, precautionary principle, adaptive management, cumulative impacts and public participation. Please accept these additional comments and recommendations specifically focused on marine spatial planning and the emerging issue of offshore renewable energy development.

In his June 12, 2009 Memorandum on National Policy for the Oceans, Our Coasts, and the Great Lakes (herein the "Ocean Policy Memo"), President Obama made

clear his expectations of a definitive national policy whose core value is to “*ensure(s) the protection, maintenance, and restoration of the health of ocean, coastal, and Great Lakes ecosystems and resources.*”¹ He also called for the development of framework for coastal and marine spatial planning (herein “MSP”) based on “*a comprehensive, integrated, ecosystem-based approach that addresses conservation, economic activity, user conflict, and sustainable use of ocean, coastal, and Great Lakes resources*”². COA shares President Obama’s vision to ensure the continued protection of the ocean today and for future generations and we look forward to contributing to his efforts to initiate comprehensive, science-based coastal and marine spatial planning. Any marine spatial planning efforts must also include significant, meaningful opportunity for public input and involvement and be guided by principles that promote and maintain a healthy, productive, sustainable, and resilient condition of our marine ecosystems.

It is crucial that we enact as strong an ocean policy as possible, without compromise, at this time. History tells us that compromises will follow as industry increases pressure and harmful administrations take control of councils and interpret policies. Policies with good intentions but without limiting the discretion and loopholes for harm can be used by future officials to undermine progress. The best way to prevent a bad administration from using something good to undermine environmental protection is to establish a framework that leaves no doors open and does not moderate on important issues.

Moreover, the ocean is one large fluid, interconnected system and this unique condition makes it a much more challenging ecosystem to manage than land, as a spill, dead-zone, or physical constraint can have wide ranging effects.

Need for MSP

With the increase of ocean sprawl for industrial uses the need for marine spatial planning is essential. However, MSP must be considered within the context of achieving and sustaining the Presidents vision. The current debate regarding reopening moratorium areas to offshore drilling is inconsistent with the goals and mission described in President Obama’s Ocean Policy Memo. Proactively, plans must look forward to ensure that our clean renewable energy future is done in as green (and blue) a manner as possible.

Indeed, many regions have legacies which have resulted in strong public opinion based on historical ocean abuses. For example, this region went from the Ocean Dumping Capitol of the World and a national joke due to poor water quality to a premier shore tourism destination—accounting for two thirds of a \$36 billion industry.

The role of MSP for ecological protection is increasing. Although most scientists and managers agree that an ecosystem-based strategy is a more appropriate and sustainable approach to ocean and coastal management, putting ecosystem-based management (herein “EBM”) concepts into practice has proven much more difficult. MSP has emerged as an important tool for implementing an EBM approach, as it provides “*a mechanism for a strategic and integrated*

¹ President Barrack Obama to Heads of Executive Departments and Agencies, Memorandum regarding National Policy for the Oceans, Our Coasts, and the Great Lakes, June 12, 2009, The White House Office of the Press Secretary.

² Ibid.

*plan-based approach for marine management that makes it possible to look at the ‘bigger picture’ and to manage current and potential conflicting uses, the cumulative effects of human activities, and marine protection.*³” Comprehensive spatial planning of our oceans and coasts is necessary to achieve the EBM goals of restoring and maintaining marine and coastal ecosystems in a healthy, productive and resilient condition by ensuring proper siting of appropriate clean ocean-dependent uses in a way that reduces or eliminates user conflicts and accounts for protection of vital aquatic resources. In particular, areas that support vulnerable species populations, contain unique habitats, or have other important ecological attributes need to be identified and protected.

Existing Efforts that Support MSP

In developing a framework for MSP, other concurrent efforts will prove valuable in establishing a sound system for planning. The federal Clean Ocean Zone legislation, set to be introduced in the U.S. Congress by New Jersey legislators, is a regional approach to management of the New York/New Jersey Bight that includes important planning principles with the goal of reducing pollution, protecting marine ecosystems and supporting marine resource activities. COA strongly urges the swift passage of this important and protective Bill.

In addition, the formation of regional ocean councils like the Mid-Atlantic Regional Council on the Ocean, which includes NJ, NY, DE, MD, and VA, could provide the forum for coordinated state-level planning efforts. Such collaboration provides a key opportunity for New York and New Jersey to begin working with the federal government and the interested public to undertake marine spatial planning. However, as stated throughout these comments open, meaningful, transparent, participation and involvement with grassroots, local constituents is essential to successful policies and programs, as opposed to policies generated by a select, politically appointed panel of citizens.

MSP must be Spatially Explicit and Include Biophysical and Human Uses

The marine environment is heterogeneous and multi-dimensional, including time. The presence and distribution of many marine organisms is limited by the availability of the required resources and habitats needed to support and sustain them, while many human activities are also limited to where and when the target resource is present. This multitude of natural and anthropogenic ocean uses compete with each other for space and resources. In our current, sector-based management system, this inherent interconnectedness is not accounted for, resulting in insufficient and erroneous assessments of the impacts of proposed human uses. For example, a recent assessment of the British Columbian coastal region found that 83% of the continental shelf and slope is currently being used by humans resulting in 98% of these areas being affected by stressors from anthropogenic activities.⁴ Similar detrimental impacts of human uses to ocean and coastal resources have been well documented on both a global and national scale.^{5,6,7,8,9} Therefore, an

³ F. Douvère, (2008) The Role of Marine Spatial Planning in Implementing Ecosystem-based, Sea Use Management Marine Policy, 32(5): 762-771

⁴ N. Ban and J. Alder (2008) How wild is the ocean? Assessing the intensity of anthropogenic marine activities in British Columbia, Canada, Aquatic Conservation: Marine and Freshwater Ecosystems 18: 55–85

⁵ Millennium Ecosystem Assessment, (2005) ECOSYSTEMS AND HUMAN WELL-BEING: WETLANDS AND WATER Synthesis, World Resources Institute, Washington, DC.

⁶ B. Halpern, et. al., (2008) A Global Map of Human Impacts on Marine Ecosystems. Science 319: 948-952.

initial step in any MSP effort must be to determine the biophysical conditions and spatial/temporal patterns of all human uses of the oceans on a regional basis.¹⁰ This assessment must be inclusive. For example, the marine ecosystem is buffering the human use of fossil fuels resulting in sea level rise, acidification, climate change, eutrophication from nitrogen fallout, to name a few. These must be recognized and accounted for when determining additional burdens or inputs of pollution.

Biophysical conditions within a certain region can include habitat types, distinct assemblages and communities of organisms, locations that acts as sources and sinks for recruitment, migratory routes, biogeochemical cycles, geological formations and currents. One of the most important, and often the most challenging, aspects of MSP is identifying, and subsequently conserving (in space and time) those places that “*have greater importance than others for particular species, ecosystems or processes, and hence for humans*”¹¹.

Sufficient baseline data must be available to identify the biophysical conditions of a particular region. To that end, in December 2008, the Department of Interior’s Minerals Management Service identified very significant scientific data gaps for the entire Atlantic coastline that need to be filled. In April 2009, Department of Interior released a new report on energy resources in the Atlantic Outer Continental Shelf (OCS) that reiterated the need for additional data and information on environmental impacts. COA further asserts that these data gaps must be addressed. Data that do exist often differ in format, focus and scale and are dispersed among many different federal and state government agencies, academic institutions and non-profit groups. There are several ongoing efforts to compile, integrate and analyze available data sets by region, including the Nature Conservancy’s Marine Ecoregional Assessments and NOAA’s Multipurpose Marine Cadastre. Federal and state governments need to support such efforts to utilize existing data and fill data gaps in baseline information, in order to provide the groundwork for informed MSP based on sound science. Due to the dynamic nature of ecosystems and the need to assess the effectiveness of management actions, ecosystem monitoring and assessment must be an ongoing and adaptive effort.

Importantly, such research efforts much be directed for the development of renewable energy sources and clean ocean uses (not fossil fuel energy) and must not pose a threat to marine life such as the right whale.

The availability of a geospatial database of integrated information on the biophysical conditions and human uses present within a given region will allow managers to identify important conservation targets and evaluate the compatibility of specific human uses with the EBM goal of

⁷ B. Worm, et. al., (2006) Impacts of Biodiversity Loss on Ocean Ecosystem Services, *Science* 314: 787-790.

⁸ S.J. Hawkins, et. al (1999) Restoration of temperate marine and coastal ecosystems: nudging nature, *Aquatic Conservation: Marine and Freshwater Ecosystems* 9: 23–46.

⁹ B. Halpern, et. al., (2009) Mapping cumulative human impacts to California Current marine ecosystems, *Conservation Letters*, 2(3): 138-148

¹⁰ B. Halpern, et. al., (2009) Mapping cumulative human impacts to California Current marine ecosystems, *Conservation Letters*, 2(3): 138-148

¹¹ L. Crowder & E. Norse (2008) Essential ecological insights for marine ecosystem-based management and marine spatial planning, *Marine Policy* 32 (2008) 772– 778

restoring and maintaining marine and coastal ecosystems in a healthy, productive and resilient condition. These databases will also inform decisions on the impacts and appropriateness of different ocean and coastal uses and determine the appropriate temporal and spatial extent and intensity of an acceptable human use, including the development of “build-out” scenarios that consider the cumulative impacts associated with achieving final “build-out” within individual areas and amongst all areas.

Role of MSP in Improving Cumulative Impact Assessment

Adopting an ecosystem-based approach to management of our marine waters will improve cumulative impact assessment by requiring permitting agencies to: 1) recognize and consider the dynamic interconnectedness within and between ecosystems, and 2) consequently evaluate the cumulative effects of different proposed activities on the diversity, abundance and interactions of marine organisms and habitats. MSP results in the physical mapping of human activities and marine resources and provides a tangible documentation of the overlap and potential interactions that occur between and amongst all users (human and non-human). This information can then be used to more accurately identify and reduce or eliminate potential cumulative impacts through proper siting or prohibition of incompatible activities.

In order to understand the short- and long-term implications of allowing multiple uses in a specific area, it is necessary to identify and compare impacts of different activities within a system. One such method, proposed by Halpern et al.¹² quantifies and ranks an activities threat to ecosystem health by examining five attributes: the spatial scale, taxonomic scale (species to entire community) and frequency of the activity, and the resistance and recovery time of the ecosystem to the activity. Threats that rank high in several or all of these five vulnerability measures emerge as dominant stressors to an ecosystem: while threats that rank high in few or none of the vulnerability measures are less important stressors. Understanding the landscape of dominant and weak stressors allows for a better “mapping” of the cumulative and interactive effects of different human activities. If dominant stressors are identified, spatial plans could prohibit the activities that lead to that stress throughout the management area, or only allow that stressor in areas where no other activities occur, while activities that do not interfere or undermine each other can be allowed to coexist. When the available science is insufficient to accurately assess the above attributes of a particular activity, a precautionary approach must be employed that puts the burden of proof on the activity to show potential harm is minimal or nonexistent. For additional details on the precautionary principle, please see Clean Ocean Action’s August 14, 2009 Comments on National Ocean Policy to the INOP taskforce. Halpern et. al.’s proposed method is but one example of how we might quantify cumulative impacts. Whatever method is ultimately adopted, the key to environmentally responsible marine spatial planning will be to clearly identify and analyze the cumulative impacts of proposed ocean uses between and among other uses and marine resources.

Public Participation from Start to Finish

Even the most well-planned and efficient governance structure will fail if it does not include a clear requirement for meaningful public participation at all levels of government and at each

¹² Halpern BS, et al (2007) Evaluating and ranking global and regional threats to marine ecosystems. *Conservation Biology*, 21: 1301e15

stage of development. COA supports the development and implementation of Marine Spatial Planning, as long as it includes a requirement for robust and meaningful public input and participation. Getting the public to “buy in” to a policy developed from the top down is often not successful. Instead, the best public policies start from the grass-roots up. The interested public must “be in” on policy development early at the most local level, often and sustained, including regular and continuous communication and dialogue. MSP will require trade-offs and conflict resolution that can only be achieved through group consensus. Ultimately, determinations regarding appropriate ocean uses, allocation of space and resources, and protection of those resources will be based on societal choice. Public support for the preservation and protection of environmental resources is based on their understanding of environmental issues and their active role in developing management solutions. Therefore, the development and implementation of MSP must include an explicit requirement for robust and ongoing public participation in the form of workgroups and/or taskforces active at each level of governance (federal, regional state and local). Each step in the process, from data sharing to policy development, must include open transparent, meaningful opportunities for interested groups to interact and share ideas and knowledge to develop these policies and plans. For example, recent New England and Mid-Atlantic MSP Regional Workshops, a collaborative effort between The Nature Conservancy and NOAA, provided a forum for broad participation among the public and interested groups to share data and information to be used towards developing regional habitat assessments, an important step in the MSP process. The INOP Taskforce has also been convening expert roundtables at the federal level to assist in meeting the challenges spelled out in President Obama’s Ocean Policy Memo. COA urges the INOP Taskforce to continue to seek out a diversity of experts from throughout the country and include regional organizations such as Clean Ocean Action, which employs highly experienced and educated individuals, including two Ph.D’s and a J.D., as well as an Executive Director with over 25 years of experience influencing local, state and federal ocean policy. In addition, these expert panels do not complete the requirement for open transparent and meaningful public participation. In addition, the Task Force has been holding public hearings, one per coast, to seek public input. While a good start, with only 2-3 minutes allowed per speaker, this public participation is clearly not meaningful or robust.

The meaningful inclusion of the interested public at all stages of the process leads to stronger, more resilient plans by identifying conflicts, providing knowledge about issues/problems present at all scales (national, regional and local) and allowing for the development of common solutions that lead to public support and ownership of policies, programs and activities.

Emerging Issue of Renewable Energy

The planet’s peril due to the use/abuse of fossil fuels is driving a wave of new renewable energy technologies development especially into the sea. However, continuation of the status quo of wasteful and irresponsible fossil fuel energy consumption will prevent offshore renewable energy development from positively affecting global warming, climate change and sea-level rise. Therefore, any decision to open our oceans and coasts to renewable develop must be done as part of a larger, comprehensive national energy policy with the goal of dramatically reducing overall energy consumption through efficiency and conservation mandates and retiring traditional, carbon-emitting power generation.

Good governance is necessary to ensure that renewable energy projects are carefully planned, selected, implemented, and monitored. The process begins with comprehensive ecological baseline studies and is followed by marine spatial planning and risk analyses. Once appropriate areas for renewable energy development have been determined, standard data collection methods, ongoing monitoring regimes, and ecological performance standards need to be developed, implemented, and acted on in order to protect and maintain our valuable marine ecosystem. The number and scale of projects and their cumulative impacts must also be considered. Early and ongoing inclusion of the interested public at all stages of the process is a critical component of good governance. As described above, COA has already commented on the importance of ecological baseline data and marine spatial planning. Below please find our specific recommendations for responsible development of offshore renewable energy.

Pre- and Post-Construction Studies

NOAA and MMS must determine the scale, scope, and extent of data necessary to accurately predict risk to organisms and habitats. NOAA and MMS must also develop standard protocols for the collection of these data. These protocols would include required data collection efforts prior to and during construction, operation, and decommissioning. Better methods, criteria, and predictive models are needed to more accurately predict the potential for impacts to marine populations and communities from 1) various levels of renewable energy development, 2) various scales of individual commercial projects, and 3) the cumulative scale of multiple projects in a particular region. To ensure protocols, criteria and models are based on objective, scientifically valid information their development must include input and review from marine scientists and oceanographers from academia, government, industry and non-profit groups.

Data collection efforts also need to include synthesis and analysis of all relevant existing data from both public and private sources. Furthermore, the United States can benefit from Europe's considerable experience with offshore wind development, including their significant, ongoing effort to develop standard data collection methods and ecological performance standards. There also needs to be a central clearinghouse for information and data that can be accessed by the public for each project. This public data library should include all existing data for baseline resources and risk analyses, along with a requirement that developers submit all site-specific data and information collected to support pre-construction, construction, operation, and decommissioning of renewable energy facilities.

Ecological Performance Standards

Each facility, whether pilot or commercial scale, should be required to achieve performance standards developed by NOAA that ensure the protection of marine organisms and habitats. These standards need to be specific, trackable, and quantifiable to allow for appropriate data collection efforts that can determine whether standards are being achieved.

Pilot and Demonstration Projects For Emerging Technologies

In addition to the above steps and studies, pilot and demonstration projects are an important step to advance new emerging technologies (e.g., wave, tidal, and current, as opposed to offshore wind). As of fall 2008, FERC issued 34 tidal and 9 wave permits in U.S. waters, with another 20 tidal, 4 wave, and 3 ocean-current applications pending. State governments and renewable developers need to work together with FERC to ensure pilot projects can be deployed at a

reasonable cost and timeframe with the goal of accurately assessing the technologies viability and environmental impacts of future commercial-scale deployment.

Environmental impacts of new technologies are largely unknown and different design scenarios often result in different levels of impact. Initial deployments must be limited in scale to ensure environmental protection and inform regulatory decision-making regarding best available technologies that will reduce or eliminate impacts. For example, there are currently at least four (4) different designs for wave energy generation, each with their own set of risks, generating capacities, and potential to adversely affect organisms, habitat, and wave propagation. These factors need to be assessed and compared with competing design options to ensure permits are only given to the best technology with the least environmental impact. Pilot projects are critical for demonstrating the viability of the new technology, identifying any limitations or problems with the technology, and evaluating potential predicted and unexpected environmental impacts.

Pilot projects should also still play a role in offshore wind development. New Jersey has proposed new rules that would allow up to 5 wind turbines in state waters, but would require site-specific ecological data to establish the abundance, distribution, and behavior of avian species, bats, and marine organisms prior to site approval. Although commercial scale wind farms exist offshore Europe, no offshore wind projects exist in the U.S. The Atlantic coast has significant oceanographic and meteorological differences compared to offshore Europe, such as the potential for hurricanes and a stronger and faster boundary current, the Gulf Stream. Much must still be learned about the technologies and environmental impacts, and pilots can play an important role for offshore wind.

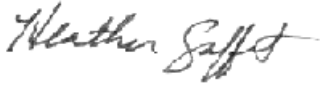
Unrealistic timelines and expectations also threaten to undermine meaningful, responsible development of offshore renewable energy by downplaying the reality of the multiple challenges that lie ahead. Above and beyond the determination of environmentally appropriate scale and siting, the offshore renewable energy industry faces many practical issues that come with developing and integrating a nascent energy supply. Some of these challenges include upgrading grid transmission capacity and nearshore electricity transfer stations, ensuring adequate availability of turbines, equipment and specialty transport ships, and identifying locations for onshore staging for construction, operation and maintenance close enough to offshore development sites. With thoughtful planning, we can overcome these challenges and maximize the environmental benefits from renewable energy in the ocean while minimizing harm to one of our most important environments.

In conclusion, Clean Ocean Action looks forward to continued participation in this ongoing process of developing an effective and protective National Policy for the Oceans, Our Coasts, and the Great Lakes that ensure the maintenance and restoration of these important ecosystems. We also request representation at the expert roundtable meetings being organized and utilized by the CEQ or INOP taskforce to achieve the goals set forth in the President's Ocean Policy Memo.

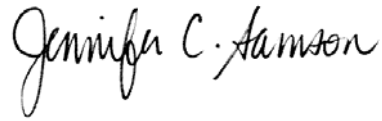
Sincerely,



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