

**Ocean Protection Council Meeting
September 10 -11, 2008
Public Comment**

| Name | Affiliation | Subject of Communication |
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| Teri Shore | Turtle Island Restoration Network | California's Sea Turtles – the Pacific Leatherback and Loggerhead |
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TURTLE ISLAND RESTORATION NETWORK



SEA TURTLE RESTORATION PROJECT • GOTMERCURY.ORG •
SALMON PROTECTION AND WATERSHED NETWORK (SPAWN)
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August 28, 2008

Secretary for Resources Mike Chrisman and
Ocean Protection Council Members
Resources Agency
1416 Ninth Street, Suite 1311
Sacramento, CA 95814

RE: California's Sea Turtles – the Pacific Leatherback
and Loggerhead

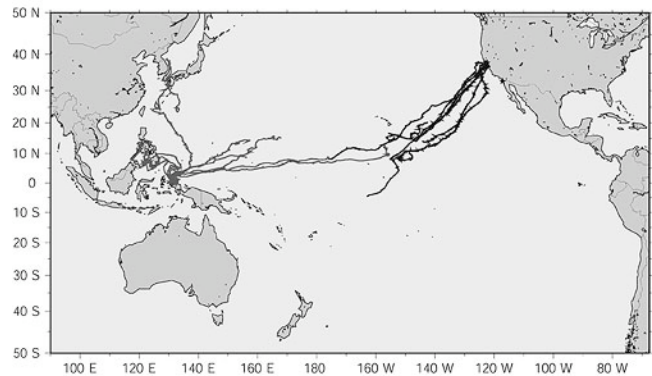
Action: Request Support from Ocean Protection Council
To Protect Sea Turtles in Coastal Waters from New
Longline Fishery



Leatherback on nesting beach. Doug Perrine photo

Dear Secretary Chrisman and members of the Ocean Protection Council,

The sea turtles are coming. In fact, they may already be here, searching for jellyfish in the California Current. Beginning in late summer and through the winter, California is home to two highly threatened species of sea turtle: the *Pacific Leatherback* and the *Pacific Loggerhead*. Our coast contains one of the most important feeding areas in the entire world for leatherbacks and is a critical migratory corridor for loggerheads.



Satellite-tracked leatherback movements from nesting beaches in Papua, Indonesia and from foraging areas off the California coast in 2003-2004 (Dutton et al., unpublished) GMT map by Denise Parker

Every year Pacific leatherbacks swim more than 6,000 miles across the ocean from their nesting grounds in Indonesia to our coastal waters. Today this ancient species finds safe harbor in the Pacific Leatherback Conservation Area that extends from Central California to Oregon. For more than 30 years, the state of California has maintained fishery policies that protect endangered sea turtles and other marine life by prohibiting large-scale industrial longline fishing within 200 miles of the coast.

However, this safe harbor is now being threatened by an unpopular federal fishery plan to open a deadly new longline swordfish fishery within 200 miles of our shores that has never been allowed by the state of California – and was rejected last year with broad opposition from scientists, conservation groups, fishers and the public.

The Ocean Protection Council can help maintain current protections for sea turtles and marine resources that would be harmed by this fishery with a policy statement that supports California's longstanding

commitment to safeguarding sea turtles and the oceans. Turtle Island Restoration Network urges you to consider the following and determine an appropriate course of action.

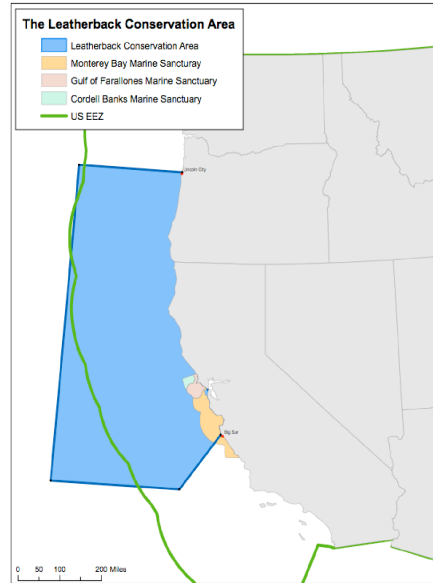
California's Sea Turtles – Endangered and Threatened

Pacific leatherback and loggerhead sea turtles are among the most imperiled of any sea turtle population in any ocean basin on Earth.

Endangered: The Pacific leatherback—a 100 million year old species that outlived the dinosaurs—has declined by approximately 90% in the last 25 years.ⁱ All populations of leatherback sea turtles are listed as “endangered” under the U.S. Endangered Species Act (ESA). They are also classified as **critically endangered** by the World Conservation Union (IUCN) Red List of Threatened Speciesⁱⁱ, which defines critically endangered as a species “facing an extremely high risk of extinction in the wild in the immediate future.”ⁱⁱⁱ

In 2008, after decades of population declines at all major leatherback nesting beaches, scientists now estimate there are less than 5,000 adult female Pacific leatherbacks left in the Pacific Ocean.

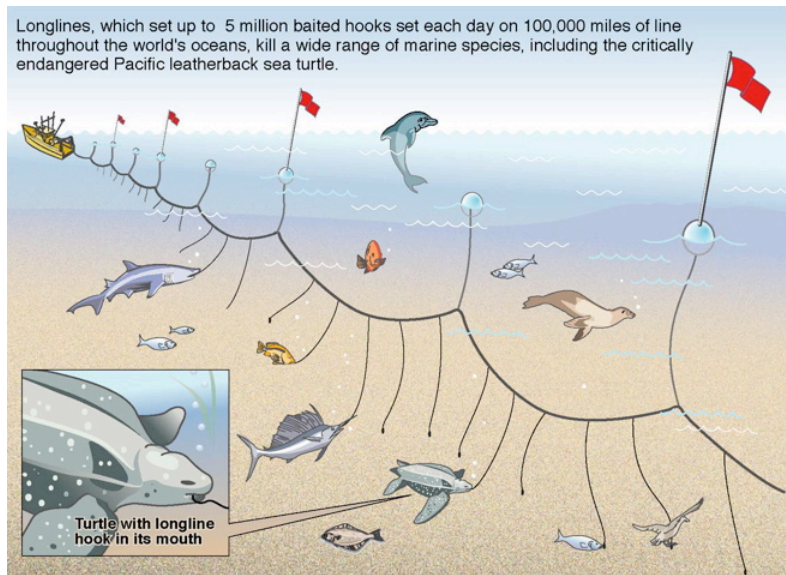
Threatened: Pacific loggerheads have declined by at least by 80% since the 1980s.^{iv} They are currently listed as “threatened”, but are currently being considered for up-listing to “endangered” under the Endangered Species Act – a decision due in coming months.



Sea Turtles and Fisheries

The immediate, primary threat to Pacific leatherbacks and loggerheads is drowning and injury from interactions with longline and gillnet fishing gear. Scientists estimate that as many as 50-60% of the remaining Pacific Leatherbacks are caught each year by longline fisherman.^v In 2000, pelagic longlines in the Pacific captured an estimated 20,000 leatherbacks resulting in the mortality of an estimated 1,000-3,200 leatherbacks.^{vi}

Swordfish longline fisheries are particularly threatening to these species. Data collected from fishing vessels has revealed that longlines set to catch swordfish snare leatherback turtles at a 3 times greater, loggerheads at 10 times greater, rate than tuna longlines.^{vii}



Catching even small numbers of Pacific leatherbacks and loggerheads has serious consequences for their future survival.

West Coast Protections Today

Gillnet fishing for swordfish is prohibited within the Leatherback Conservation Zone along our coast from August to December to protect sea turtles. As a result, this fishery has not killed any leatherbacks since this went into effect in 2001.

A commercial longline fishery for swordfish and tuna has never been allowed long-term in California within 200 miles of the coast due to the high bycatch levels of non-target fish, sea turtles, and other marine life. So the capture and mortality rate from longline fisheries has been consistently zero.

New Threats – Federal Fishery Managers Pushing To Open Deadly Longline Fishery

The National Marine Fisheries Service (NMFS) and its regional advisory council the Pacific Fisheries Management Council (PFMC) are moving forward with plans to create a new swordfish longline fishery off the California Coast that has the potential to impact marine resources of the state of California. NMFS is expected to publish a final rule approving the permit any day now.

The proposal consists of an “exempted fishing permit” (EFP) for a swordfish fishery within California’s Exclusive Economic Zone (EEZ). This proposal was opposed by the California Department of Fish and Game and the California Coastal Commission in 2007 and was widely opposed by sea turtle biologists, environmental groups, recreational fishing groups and the public.

The federal agency wants to open the door to a new commercial fishery by granting a permit to a single vessel owned by a member of the Pacific Fishery Management Council’s Highly Migratory Species Advisory Subpanel. The effort would then increase in size and scope.

Facts about the new fishery permits

Turtle Island Restoration Network and our coalition of ocean advocacy partners believe that you may share our concerns with proposals are summarized below:

- The State of California has never permitted commercial pelagic longline swordfish fishing in its EEZ and continues to oppose the development of these longline fisheries.
- Recently, the state legislature adopted California Assembly Joint Resolution 62, urging the delay or denial of new West Coast longline fishery permits – which was co-authored by OPC Council Member Assemblyman Pedro Nava and supported and moved by OPC Council Member Senator Darrell Steinberg;
- The EFP faces broad public opposition. The California Legislature, the California Department of Fish and Game, the California Coastal Commission, prominent sea turtle biologists, recreational fishing organizations, a coalition of environmental organizations, and the tens of thousands of citizens oppose the EFP.



Leatherback sea turtle to be cut from hook on longline at fishing vessel. NOAA photo.

- The current proposal would allow pelagic longline fishing into the EEZ along the California and Oregon coast, an area that provides vital habitat for this endangered species on the brink of extinction. Science shows that the cumulative impact of catching even small numbers of Pacific leatherbacks and North Pacific loggerheads can have serious negative consequences for these species' survival.
- The PFMC, NMFS, and California Coastal Commission have all concluded the EFP would NOT provide statistically significant data and would not help fishery managers make science-based future management decisions.
- The EFP would not meet its stated purpose. The National Marine Fisheries Service, the Pacific Fishery Management Council's Scientific and Statistical Advisory Committee, and the California Coastal Commission all agree that the EFP would not generate sufficient statistical data to compare longline and drift gill-net fisheries off the U.S. West coast.
- The EFP would allow longlining inside the Pacific Leatherback Conservation Area (PLCA). This time-area closure to fishing was deemed necessary to maintain the population of Pacific leatherbacks off the U.S. West Coast and protect the species from being caught as by-catch.
- The EFP would also threaten many other vulnerable marine species. Whales, dolphins, sea lions, other marine mammals, and seabirds would also be injured or killed as the result of the EFP.
- Approval of swordfish fisheries would jeopardize vulnerable sea turtle species before pending completion of Endangered Species Act (ESA) petitions to designate waters along the US West Coast as Critical Habitat for Pacific leatherbacks, and to reclassify North Pacific Loggerheads as endangered. Sound science—not a desire to promote fishing—should drive fishing policy on the West Coast.
- Swordfish—the target species of both these fisheries—is known to have high mercury levels hazardous to woman and children when eaten. Promoting fishing of this fish is contrary to good public health policy.

Despite the above-mentioned opposition from the California Legislature, California state agencies and overwhelming opposition from the public, scientific, recreational fishing, and environmental community, the Pacific Fisheries Management Council and National Marine Fisheries Service continue to move forward with plans to open harmful a new federal fishery along our Coast.

We are asking your support in the form of a policy statement such as a resolution or letter urging the National Marine Fisheries Service to deny the approval of the new “experimental” longline swordfish fishery. We look forward to working with you on this important marine resource issue.

Sincerely,



Teri Shore
Program Director

¹ Rebecca L. Lewison, Sloan A. Freeman & Larry B. Crowder, Quantifying the effects of fisheries on threatened species: the impact of pelagic longlines on logger head and leatherback sea turtles, 7 Ecology Letters 226 (2004).

ⁱⁱ IUCN, IUCN Red List of Threatened Species, *Dermochelys coriacea* <http://www.iucnredlist.org/search/details.php/6494/summ> (August 12, 2008)

ⁱⁱⁱ IUCN, IUCN Red List of Threatened Species, The Categories http://www.iucnredlist.org/info/categories_criteria1994#categories (August 12, 2008)

^{iv} Id.

^v Lewison et al. 2004.

^{vi} Lewison et al. 2004.

^{vii} SPREP. 2001. A review of turtle bycatch in the western and central Pacific Ocean tuna fisheries. A report prepared for the South Pacific Regional Environment Programme (SPREP) by the Oceanic Fisheries Programme, Secretariat of the Pacific Community (SPC). 26pp.



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September 8, 2008

The Honorable Mike Chrisman, Chair
California Ocean Protection Council
1416 9th Street, Suite 1311
Sacramento, California 95814

Dear Chairman Chrisman:

I write to respectfully recommend the Council's approval of the staff recommendation that sediment management be adopted as a 2008-2010 OPC Program Priority.

The California coast supports vibrant coastal communities, a thriving tourism and recreation industry, and major marine transportation ports. A 2005 National Ocean Economics Program study found that the 2000 ocean industry California Gross State Product (GSP) was \$43 billion, or 19% of the entire nation's coastal economy. The residents and tourists who use California's beaches are the mainstay of this coastal economy – California beaches alone have more tourist visits (567 million) than the combined visits to all 346 National Park Service properties including national seashores and monuments such as the Lincoln Memorial and Washington Monument – but these beaches are threatened by erosion and other sediment processes that are not yet understood.

California needs to know where her beaches are going, and when.

We do know that winter storm waves push beach sand far offshore into deep water, where it is largely lost from the coastal zone. Rivers bring sand from inland sources to the shoreline, but flood (and drought) control over past decades has severely reduced the input from these sources. Southern California beaches have virtually no remaining river replenishment.

More dams are proposed to deal with the impending shortage of potable water in California. Conversely, antiquated dams may be removed, releasing large amounts of impounded silt and sediment. Cliff erosion also provides sand to beaches, but ever-increasing reaches of shoreline cliffs (e.g. the coastal Amtrak route) are buttressed with seawalls and other structures. As a result, beach nourishments using offshore sands are becoming more common. But these nourishment projects are inherently expensive. They should be undertaken in view of beach processes data that suggest the proposed replenishment sites are both geographically and seasonally appropriate.

Effective shoreline management requires knowledge of the baseline condition of local beaches and their seasonal variations, as well as the possible response of beaches to storms, long-term changes in wave forces, and sea level change. Yet our understanding of past coastal sediment budgets is qualitative at best, and future beach sand budgets will be influenced by factors ranging from rainfall to regulation of

“opportunistic sand nourishments” with dredged material. In addition, global climate shifts over the next few decades will profoundly impact the coastal watershed and coastal oceans.

Accurate monitoring and modeling of beach topography and sand volume over extended periods is an essential component in understanding beach health, and in providing the knowledge needed for effective (and cost effective) public policy. The coastal watershed is an integrated hydrological system extending from mountains to the ocean, and observations will need to address beach sand level variability over time, coastal sediment flux from beach cliffs and inland terrain, spatial and temporal variability of the Sierra snow pack, erosion following large wildfires, and changes in wetland boundaries and vegetation.

Economic and environmental stakes are high and timing is critical. Beach processes remain the missing scientific link in truly integrating the rapidly changing dynamics of watershed, coast, and seafloor.

Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read "Tony Haymet". The signature is stylized with a large, sweeping initial "T" and a circular flourish at the end.

Tony Haymet
Director

A handwritten signature in blue ink, appearing to read "Haymet". The signature is highly stylized and cursive, with a large loop at the end.



Five-Year Program Priorities for the Ocean Protection Council

(Order does not designate priority)

1) *Promote Sustainable Fishery Management and Support California's Fishing Heritage*

- a) Support improved Marine Life Management Act (MLMA) implementation.
- b) Support development and implementation of innovative approaches and measures, including incentive-based programs and lower impact gear, to improve the sustainability of California fisheries, consistent with the general policies of the MLMA.
- c) Help conduct fishery pilot projects that explore alternative management models.
- d) Promote improved commercial and recreational fishery data collection and reporting.

2) *Promote Ocean and Coastal Habitat and Ecosystem Protection*

- a) Support completion of Marine Protected Area (MPA) designations as part of the MLPA.
- b) Support implementation of MPAs, including monitoring and education, as part of the MLPA.
- c) Contribute to habitat restoration projects coast-wide not undertaken by other agencies, focusing on those that contribute most to improved ocean health.
- d) Support applied research directed at understanding ecosystem structure, function, and integrity.
- e) Assist with resources for mapping of California's coastal sea floor to the extent necessary for conservation of state ocean resources and prioritize those areas where mapping is critical to improved management.

3) *Harmonize California Ocean Policy and Governance to Ensure Streamlined and Effective Management of Activities that Impact Ocean Health*

- a) Identify and address policy gaps, conflicts, and overlaps between state entities that have coastal and ocean jurisdiction.
- b) Promote development of a framework or forum for implementing an area-based management (ABM) policy to better manage activities that impact our oceans and coast.
- c) Develop and apply practical approaches and tools to implement integrated conservation and management approaches statewide that support ocean ecosystem and watershed ecosystem protection, including at the land/sea interface.
- d) Support increased capacity and new management techniques for ocean wildlife and habitat enforcement.

4) *Promote an Effective Response to Climate Change*

- a) Promote actions that mitigate the effects of climate change on California's ocean and coastal resources and adaptation policies that address unavoidable climate change impacts to ocean and coastal systems, consistent with maintaining natural coast and ocean processes.

5) Influence Regional and National Ocean Policy by Making California a Leader in Pew Ocean Commission and U.S. Commission on Ocean Policy

Recommendation Implementation

- a) Make California a model for the implementation of Commission recommendations at the state and regional level.
- b) Communicate California successes and lessons learned to help improve regional and national ocean and coastal governance efforts.

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Natural Resources Defense Council

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Hoopa Valley Tribal Council

HOOPA VALLEY TRIBE

Regular Meetings on the First and Third Thursday of Each Month

P.O. Box 1348 • HOOPA, CALIFORNIA 95546 • Phone 625-4211 • Fax 625-4594



Clifford Lyle Marshall, Sr.
Chairman

Comments of the Hoopa Valley Tribe Regarding Updates to the California Water plan Presented March 11, 2008

For thousands of years the Hoopa Valley Tribe (Tribe) has resided on the Trinity River. The Trinity River is the focal point of our culture, religion and economy. In its natural course the river is a tributary of the Klamath River. With the Bureau of Reclamation's completion of the Trinity River Division (TRD) of the Central Valley Project (CVP) in 1963, the Trinity River also became an artificial tributary of the Sacramento/San Joaquin watershed and the only source of imported water to the Central Valley. The TRD enabled irrigation of substantial areas on the west side of the San Joaquin Valley.

Contrary to law that prohibited diversion of Trinity River water required for in-basin needs, the Bureau of Reclamation diverted up to 90 percent of the annual flow of the Trinity River into the Central Valley for use as far south as the west side of the San Joaquin Valley. For 45 years, that diversion has brought enormous wealth to water and power beneficiaries in the Central Valley, as well as having provided significant benefits to the State and National economies. The price of the transfer of wealth from the Trinity River to the San Joaquin Valley was severe reductions in Trinity River fish populations and economic and cultural devastation to the Hupa people and the north coast communities who rely on the Trinity River.

Decades of bipartisan effort by our Tribe and many others, supported by past and present members of Congress and successive Administrations, have produced critical legislation intended to restore the Trinity River. The centerpiece of the restoration effort is the Central Valley Project Improvement Act (CVPIA) (Public Law 102-575 Title XXXIV, October 30, 1992, 106 Stat. 4706). The CVPIA makes environmental restoration a CVP purpose and requires CVP water and power contractors to pay restoration costs.

In 2000, the Tribe and Secretary of the Interior signed the Trinity River Restoration Record of Decision (ROD). However, judicial and administrative attacks from water and power contractors delayed the start of restoration by four years. San Joaquin water contractors have filed administrative appeals to impede individual Trinity River fish habitat improvement projects as late as 2006. In addition, failure by the Department of the Interior to enforce restoration repayment provisions, fishery restoration remains a distant goal and restoration science and program management have suffered. The

depressed state of Klamath and Trinity fish populations is so serious that in July , 2006, the Secretary of Commerce's declared a Fishery Resources Disaster for California's north coast and southern Oregon fishery. A real twist of bureaucratic irony occurred when the National Marine Fishery Service recently informed the Tribe that our situation in 2006 does not qualify for federal economic assistance under their guidelines since the economy of our Trinity River fishery was destroyed in the late 1970s. Unlike the agricultural industry that typically receives federal subsidies, funding for water banks and the like, our tribal fishery has never received any type of federal economic assistance even though federal regulations completely close down our commercial fishing rights in 1978 due to depressed fish populations.

The ongoing environmental issues associated with conveyance of federal and state water supplies through the Bay Delta reached crisis proportions with recent judicial decisions restricting pumping to avoid harm to endangered species. The cost of resolving those issues bears directly on the funds available for ongoing Trinity restoration needs. Those issues also implicate Trinity River water supplies required by statute, federal contract and state permit to be made available for use from the Trinity River Division.

The Department of the Interior has a federal trust responsibility to implement the Trinity River restoration program while deliberations on addressing the problems in the Delta move forward. The Ninth Circuit Court of Appeals characterized the federal trust responsibility for the Trinity River in the following terms.

As a part of its harms-balancing analysis, the district court concluded that "the government is also in breach of its general and specific independent federal trust obligation to the Hoopa and Yurok Tribes." Order, 275 F. Supp. 2d at 1232. It also stated that the purpose of the CVPIA § 3406(b)(23) was to "fulfill[] the federal government's trust obligation to the Indian Tribes." *Id.* at 1234. These statements are significant in that they provide support for the court's order implementing portions of the Preferred Alternative as injunctive relief.

Westlands Water Dist. v. U.S. Dept. of Int., 376 F. 3d 853, 877. (9th Cir. 2004).

The trust responsibility bars the United States from putting itself in opposition to its fiduciary responsibility to the Hoopa Valley Tribe. Moreover, it requires the federal trustee not to act in conflict with its tribal beneficiary on an issue of fishery restoration that also affects thousands of non-Indians who are dependent on fishing. We are concerned that the Federal agencies, who have a responsibility to protect our tribal interests, have been silent on how they plan on protecting Trinity River funding and water supply as the plans for addressing problems in the Delta evolve.

We are committed to work with State and Federal agencies on solutions to California's water issues that honors the trust responsibility, secures needed restoration funding, and assures timely implementation of restoration.

On a related matter, the 110th Congress adopted Pay-As-You-Go (PAYGO) rules for new program authorizations. As the Administration and Congress consider solutions for the Delta crisis, they should not subordinate ongoing and prior responsibilities for Trinity River restoration. PAYGO should not be a constraint on Trinity River restoration because section 3406(b)(23) of the CVPIA requires CVP contractors to pay the full cost of the restoration program as part of the annual operation and maintenance charges for use of CVP water and power. The fact that the Department of the Interior has not included mandatory cost reimbursement provisions in water contracts does not excuse that obligation.

Recommendations:

- 1) Full and timely implementation of the Trinity River Record of Decision and reform ROD administration.
- 2) Funding for Trinity River restoration at the levels identified in the February 26, 2007 determination of costs by the Secretary of the Interior in consultation with the Hoopa Valley Tribe.
- 3) Full integration of the fish and wildlife restoration Central Valley Project purpose established in the CVPIA.
- 4) Implementation of CVPIA contract reform provisions, particularly those in section 3404 requiring contractors to pay for environmental restorations and in section 3406(b)(23), which make the costs of Trinity restoration reimbursable operation and maintenance costs.
- 5) Ensure transparent implementation of the CVPIA so that no stakeholders are excluded from deliberations affecting California Water Resources (a seat at the table for all interested parties).
- 6) Ensure that decision making respects the senior priority of Indian rights in natural resources and the federal responsibility for the resources that the United States holds in trust for the Hoopa Valley Tribe.
- 7) Fulfill obligations under the 1955 Trinity River Division authorization requiring annual availability of 50,000 acre feet of TRD water for uses in Humboldt County, as set forth in contracts and permits.

We appreciate the opportunity to present our views on the California Water Plan. If you have questions or are in need of further information please contact me at the above address.

Contact: Daniel Jordan, Self Governance Coordinator 530 625-4211 ext 106



September 12, 2008

The Honorable Mike Chrisman
Secretary for Resources
State of California Resources Agency
1416 Ninth Street, Suite 1311
Sacramento, CA 95814

Re: NRDC Comments to the CA Ocean Protection Council at the September 10 & 11 Meeting of the Council.

Dear Secretary Chrisman & Ocean Protection Council Members,

On behalf of the Natural Resources Defense Council (NRDC), I am writing to submit the following comments regarding the Ocean Protection Council (OPC) Revised Funding Guidelines and new Program Priorities for 2008 through 2010.

As a general procedural matter, we encourage OPC to develop a practice of making available all documents for public comment at least a few days, but preferably one-two weeks, in advance of the date for public comment. The Council members' decision to table the vote on adopting the Funding Guidelines or Program Priorities document was appropriate, given that these documents were available to the public only a short time before OPC's meeting.

Comments on OPC Draft Revised Funding Guidelines

In general, we support the intention of these revised Funding Guidelines to provide more clarity and direction for applicants of OPC funds. However, aspects of this document appear to be at odds with that objective. Rather than provide more specific and tailored guidance that would ensure that projects are carefully tailored and directly responsive to OPC's Strategic Plan and Program Priorities, this version of the guidelines is more general than the previous. This increased generality is evidenced by the removal of the 8 specific target priorities, taken from OPC's Strategic Plan, that were listed in the previous version. Although the new Guidelines state that projects must be *consistent* with the strategic plan and the California Ocean Protection Act (COPA), we are concerned that the removal of these topical points will result in fewer activities that achieve the stated goals of the Strategic Plan and the more selective items in the Program Priorities. The topical points enumerated in the revised Funding Guidelines should mirror the items contained in the Program Priority document, as finalized.

Comments on Program Prioritization Document

NRDC has participated with other conservation groups in the submission of a set of suggested OPC priorities, in response to the draft OPC Program Priorities document. We thank the Council staff for considering our suggestions. For example, we appreciate the addition of the first item, “OPC Communications and Outreach”, to increase public availability of information about the effectiveness of projects and project expenditures. This is an important step to increase transparency and ensure that lessons learned are incorporated into future projects.

However, we encourage OPC to add to the final OPC Program Priorities document two points from the conservation groups’ suggestions: first, the development of practical approaches and tools to implement ecosystem based management “EBM” throughout the state; and second, the development of a framework for implementing an area-based management (ABM) policy to better manage activities that impact our oceans and coasts.¹ OPC’s Strategic Plan uses EBM as a performance measure for its governance enhancement activities, so inclusion of this concept in the program priorities is an important change to the current draft.²

NRDC strongly encourages OPC to complete all the governance-related goals and objectives contained in its Strategic plan. Particularly, we hope that OPC will provide the necessary funding and staff attention to complete the three studies that it has substantially begun or brought to draft form:

- The comprehensive study of all state agency budgets for ocean and coastal protection activities;
- The comprehensive study of all potential new funding sources for ocean and coastal protection; and
- An inventory of laws and gaps or overlapping jurisdictions affecting priority ocean and coastal issues.

For this third study, while the September, 2008 “Action Status” document for OPC states that it has been “Completed”, to our knowledge, this document is not complete or publically available. We believe that these documents and OPC’s other efforts to enhance the capacity and performance of ocean governance is the area where the Council has a unique and critically important role in meeting the goals of the California Ocean Protection Act and helping to make our state a model for improved ocean governance nationally and beyond.

Respectfully Submitted,



Leila Monroe
Oceans Policy Analyst

¹ We note the explanation of the staff’s decision not to include ABM; *see* Memorandum from Drew Bohan, Executive Policy Officer Revisions to the OPC Funding Guidelines and OPC Program Priorities, (September 10-11, 2008) at 4. We look forward to exploration of this approach to comprehensive, ecosystem base management of the range of uses of ocean resources, rather than as an issue-by-issue approach.

² “By 2011, ecosystem-based management approaches guide government policies and programs that affect ocean and coastal ecosystems.” The California Ocean Protection Council, A Vision for Our Ocean and Coast: Five-Year Strategic Plan, (2006) at 17.