



National Federation of
Regional Associations for
Coastal and Ocean Observing

205 Oakledge Road
Harpwell, ME 04079

Board of Directors



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October 17, 2009

The Honorable Nancy Sutley, Chair
Interagency Ocean Policy Task Force
Council on Environmental Policy
Executive Office of the President
722 Jackson Place, NW
Washington DC 20503

Dear Chair Sutley:

Thank you for the opportunity to comment on the Interim Report of the Interagency Ocean Policy Task Force.

The National Federation of Regional Associations for Coastal Ocean Observing (NFRA) is a non-profit organization that represents the interests of the 11 Regional Associations (RAs) that have formed in support of the Integrated Ocean Observing System (IOOS). The 11 RAs work with the variety of users that depend on up-to-date information for their lives and livelihoods from the coastal and Great Lake states and the US territories. The RAs work collaboratively with federal agencies and regional organizations to enhance coastal observations, apply state-of-the-art data management techniques to ensure that diverse data sets are easily accessible, and to delivery information products to users. The goal of the IOOS and the RAs is to make sure that users have easy access to the most up-to-date, quality information available on our coastal and Great Lake ecosystems.

We applaud the Report's recognition of the need for reliable ocean data for management purposes. Area of Special Emphasis #5 calls for strengthening the nation's ocean observing infrastructure to provide sustained observations, modeling, product development and data management. In March 2009, President Obama signed the Integrated Coastal Ocean Observing System Act that established a framework for achieving the goals outlined in the Interim Report. We encourage the Task Force to build on the excellent foundation that has been established by the creation of IOOS and to work with NOAA and the Office of Management and Budget to provide the funds necessary to fully implement the program.

We are encouraged by the language in the Report related to the crafting of an Ocean Policy budget that involves more than one agency. The vitality of IOOS is strongly related to the level of agency participation; failure to establish a budget process that enables funded participation by all relevant agencies will greatly impede implementation. The challenge this task represents is difficult to overstate. We encourage the Task Force to carefully explore how the Annual Budget Guidance Memorandum process will be implemented to ensure that it is functional and effective.



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The IOOS is ideally suited to assist with marine spatial planning. Already, many of the RAs are working with the Regional Ocean Alliances to identify their needs for information and data to support their marine and coastal planning processes. IOOS brings critical elements to marine spatial planning:

- 1) information on how the ecosystem, below the water's surface, is changing by providing observations on water currents, water temperature and salinity regimes, water quality and biology;
- 2) a network of 11 regional systems that provide a neutral source of information on the unique and varied coastal and Great Lake ecosystems;
- 3) robust data management system that allows, for the first time, to integrated data sets across disciplines from both federal and non-federal sources to provide a comprehensive view of the ecosystem.

The report calls for the development of strategic action plans and states that the plans “would be adaptive to allow for modification and addition of new actions based on new information and changing conditions.” The sustained observations, delivered in near-real time on the environmental conditions of the coastal ocean and Great Lakes by the IOOS, will be an important source of information for adaptive management.

As you move forward with your deliberations, please note that observations are already being used. Emergency managers in the Delaware River basin used regional storm forecasts to decide to close upriver dams to prevent coastal flooding during Tropical Storm Ernesto; county health agencies in the Great Lakes use regional models for managing drinking water supplies; oyster growers in the Pacific North Coast Guard rely on real-time temperature data to protect stocks from extreme conditions; and overlays of wave height data and surface current data provide information for wave energy and navigation in California. The goal is to take the IOOS from a demonstration phase into an operational system that can routinely and reliably provide observations and information to decision makers.

Thank you for the opportunity to comment on the Interim Report. We look forward to working with you and the National Ocean Council as you move forward.

Sincerely,

Molly McCammon, Chair,
National Federation of Regional Associations for
Coastal and Ocean Observing