



# MARINE MAMMAL COMMISSION

15 August 2017

Mr. William Douros, Regional Director  
West Coast Regional Office  
Office of National Marine Sanctuaries  
National Oceanic and Atmospheric Administration  
Silver Spring Metro Campus  
Building 4 (SSMC4), Eleventh Floor  
1305 East-West Highway  
Silver Spring, MD 20910

Re: Executive Order 13795 Review

Dear Mr. Douros:

The Marine Mammal Commission (the Commission) was created under the Marine Mammal Protection Act (MMPA) to further the conservation of marine mammals and the ecosystems on which they depend. An important part of the Commission's responsibilities is to review proposed actions by federal agencies and provide recommendations to further the purposes and policies of the MMPA, which include the protection and conservation of marine mammals and the minimization of the impacts of actions by federal agencies on marine mammals and their habitats. The Commission offers these comments in response to the Office of National Marine Sanctuaries' notice requesting public comment on the Review of National Marine Sanctuaries and Marine National Monuments Designated or Expanded since April 28, 2007 (82 Fed. Reg. 28827), particularly as these designations relate to the protection and conservation of marine mammals.

Sanctuaries and monuments provide tangible conservation benefits to a variety of marine life, including marine mammals. They protect vital habitat and prey resources for many marine mammal species. The designated areas include coastal habitats in California, which support abundant pinniped, cetacean, and sea otter populations, remote waters and islands in the Northwest Hawaiian Islands, which provide essential habitat for the endangered Hawaiian monk seal, and marine canyons and seamounts in the western North Atlantic, which serve as habitat for many species of dolphins, beaked and pilot whales, and endangered sperm, fin, and sei whales. Sanctuaries and monuments help address one of the most significant threats to certain marine mammal species by reducing the potential for entanglement in fishing gear. Protected areas also often lead to healthier fish stocks by providing breeding or nursery habitats, thereby supporting sustainable fisheries and generating greater net economic benefits for commercial and recreational fishermen.

At the same time, sanctuaries and monuments can enhance non-extractive marine activities, such as whale watching and other forms of tourism. Those activities generate significant income and employment for coastal communities. For example, whale watching in Washington State has been estimated to add a minimum of \$65-70 million to the economy each year, and, in that state, three

times as many people participate in wildlife watching than in fishing.<sup>1</sup> Further, one research survey found that just over a million households in the state of Washington place a high value (approximately \$140/household/year) on the recovery of depleted marine mammals in the area in and around the Olympic National Marine Sanctuary (Leeworthy et al. 2017). Another study, by the International Fund for Animal Welfare (O'Connor et al. 2009), found that nearly five million people participated in whale watching tours in the United States in 2008, with direct expenditures of over half a billion dollars, and indirect expenditures of nearly another half a billion dollars. Economic benefits of such non-extractive, direct and non-market activities should be included in quantitative analyses of the net benefits to the nation from marine sanctuaries and monuments.

The non-market benefits of conserving marine mammals stem not just from the non-consumptive uses noted above, but also from the value of the “ecosystem services” provided by those habitats and species. For example, marine mammals and seabirds have been shown to have a role in enhancing primary productivity of marine ecosystems by concentrating nitrogen near the surface through excretions, a process sometimes referred to as “the whale pump.” The enhancement of primary productivity in coastal waters is a type of ecosystem service, in this case resulting in more productive fisheries and, ultimately, increased revenues and employment in the fisheries sector.

The designation and management of sanctuaries and monuments reflect the value of living ocean resources to the citizens and economy of our country and any such review should take into account their full value to society. A complete valuation of all the costs and benefits (including tourism and non-market benefits) of managing these protected areas will lead to more informed decisions and greater benefit to all Americans.

The Commission believes that National Marine Sanctuaries and Marine National Monuments are important contributors to U.S. efforts under the MMPA to ensure that marine mammal populations are restored and maintained as functioning elements of healthy marine ecosystems for future generations. Sanctuaries and monuments also provide a buffer against the negative effects of certain human activities on marine mammal populations and their habitats.

The Marine Mammal Commission recommends that the Office of Marine Sanctuaries, as part of its review of National Marine Sanctuaries and Marine National Monument designations, take into account the full costs and benefits to the U.S. public of protecting these special areas, including the economic and social value associated with non-extractive activities that depend on the abundance and diversity of marine mammals and other species that inhabit these areas.

Sincerely,



Rebecca J. Lent, Ph.D.,  
Executive Director

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<sup>1</sup> See references at <https://srkwcsi.org/the-economic-value-of-southern-resident-killer-whales/>

## References

- Leeworthy, VR, D Schwarzmann, D Reyes Saade. 2017. Non-market Economic Value of Recreation Use on the Outer Coast of Washington and the Olympic Coast National Marine Sanctuary, An Attributes Approach: Volume 6, 2017. Marine Sanctuaries Conservation Series ONMS-17-10. U.S. Department of Commerce, National Oceanic and Atmospheric Administration, Office of National Marine Sanctuaries, Silver Spring, MD, 26pp.
- O'Connor, S, R Campbell, H Cortez, and T Knowles. 2009. Whale Watching Worldwide: Tourism numbers, expenditures and expanding economic benefits. A special report from the International Fund for Animal Welfare, Yarmouth MA, USA, prepared by Economists at Large.
- Roman, J and JJ McCarthy. 2010. The whale pump: marine mammals enhance primary productivity in a coastal basin. PLOS One: e13255, <https://doi.org/10.1371/journal.pone.0013255>.