



MARINE MAMMAL COMMISSION

16 July 2010

Ms. Tracy Rouleau
Office of Program Planning and Integration
National Oceanic and Atmospheric Administration
1315 East-West Highway, Room 15749
Silver Spring, MD 20910

Dear Ms. Rouleau:

The Marine Mammal Commission has reviewed the draft Arctic Vision and Strategy published by the National Oceanic and Atmospheric Administration (NOAA) in the 10 May 2010 *Federal Register* (75 Fed. Reg. 25843). The Commission appreciates the opportunity to comment on the draft document and offers the following suggestions.

Arctic environments are changing rapidly, and the need for a more effective research, management, and conservation approach is evident and urgent. The six goals in the draft Arctic Vision and Strategy are pertinent to Arctic ecosystems and biodiversity, and the Commission supports them.

That being said, the Commission must withhold its judgment regarding the utility of the Arctic Vision and Strategy until NOAA has taken the next steps to develop a corresponding Arctic action plan. At that time, the Commission will evaluate the plan with regard to three key issues.

First, will the action plan fully reflect the breadth of NOAA's research, management, and conservation responsibilities? The draft vision and strategy document gives the impression that NOAA views itself primarily as a science agency. However, NOAA also has important management responsibilities that are not well described in the current document but that are critical to the conservation of marine mammal species in the Arctic and the maintenance of healthy ecosystems and biodiversity, particularly in the transition period before the action plan is developed and implemented.

Second, will the action plan describe both scientific and management objectives in sufficient detail to judge whether they will be adequate in meeting the broad goals described in this document? The Commission believes that NOAA will have to expand greatly its resource assessment activities to fulfill its management and conservation responsibilities for Arctic ecosystems and biodiversity. In this regard, the Commission strongly supports the Distributed Biological Observatory mentioned in the vision and strategy document, but it also questions whether such an approach that uses only four sites will be sufficient for characterizing the many varied and important changes that are likely to occur throughout the Arctic.

Third, will the action plan reveal a new level of commitment to conservation in the Arctic, given the changes that are occurring and the increased human activity and resulting impact? The vision and strategy document seems, at best, ambivalent about such a commitment. For example, it indicates that assessments for marine mammals, fish, and shellfish will largely continue as is when it

Ms. Tracy Rouleau
16 July 2010
Page 2

is well known that current assessments are inadequate in many respects and that some of these species may be affected profoundly by Arctic climate change. Similarly, the document mentions a \$10 million initial budget when, in fact, such an amount could be used productively for study of Arctic marine mammals alone. Given the difficulty of working in the Arctic, conducting the research and management tasks necessary for conserving marine mammals and maintaining a functional Arctic marine ecosystem will require a much larger commitment, funding being one measure of such commitment.

The Commission considers this last point to be particularly important. The clarification of goals and the development of objectives to meet those goals will be for naught if NOAA is unable to obtain sufficient funding and related resources to carry out the research, management, and conservation tasks needed to meet them. To date, conservation efforts in the Arctic have not suffered for lack of goals but rather for inadequate implementation of existing responsibilities. In its action plan, NOAA will have to make a compelling case that its goals and objectives warrant funding and support from the Administration and Congress. The Marine Mammal Commission would be pleased to support NOAA in making the case that increased support is vital.

Please contact me whenever the Commission can provide such support or if you have questions about these comments.

Sincerely,



Timothy J. Ragen, Ph.D.
Executive Director