

Marine Mammal Commission
4340 East-West Highway, Room 905
Bethesda, MD 20814

17 July 2009

Jerry Miller, Ph.D.
Joint Subcommittee on Ocean Science and Technology
CCSP/USGCRP Office
1717 Pennsylvania Avenue, NW, Suite 250
Washington, DC 20006

Dear Dr. Miller:

The Marine Mammal Commission has reviewed *Charting the Course for Ocean Science in the United States for the Next Decade—An Ocean Research Priorities Plan and Implementation Strategy* and the 22 June 2009 *Federal Register* notice (74 Fed. Reg. 29523) requesting comments on updating the plan. The plan is a significant achievement in ocean science. It is based on broad societal themes, describes research needed to manage the nation's marine ecosystems, recognizes the real and potential effects of human activities that pose risk to marine ecosystems, recognizes the value of basic science and discovery for building our knowledge and understanding of the oceans, emphasizes a more holistic ecosystem-based approach to research and management, and provides a basis for integrating multiple research and management efforts at the federal, state, regional, and local levels. The Joint Subcommittee on Ocean Science and Technology should be commended for preparing this plan.

That being said, the value of the plan depends largely on whether it (1) is consistent with our vision of ocean science and management, (2) anticipates data and information needed to address issues before they reach a crisis stage, and (3) is embraced and implemented by the involved research organizations, including local, state, federal, and international agencies and organizations, tribes, academic institutions, industry and conservation organizations, and the public. The Administration soon will set forth its ocean vision based on the work of the Interagency Ocean Policy Task Force. If that vision requires significant change in ocean policy, then it may be necessary to revise the *Ocean Research Priorities Plan and Implementation Strategy* accordingly and provide further opportunity for public comment on the revised version.

In the interim, the Marine Mammal Commission would like to raise two points regarding the current plan, the first pertaining to the plan's substance and the second to its implementation. With regard to substance, the Commission believes that the effects and implications of climate change are not given sufficient attention in the current plan. Climate change may represent the single largest human effect on our earth-ocean-atmosphere system. Its consequences are already profound, and it is reasonable to expect that future changes will exceed our expectations, if not our imaginations. Ocean acidification is degrading marine ecosystems at an alarming rate, rising sea levels will dramatically alter coastal ecosystems, loss of sea ice will transform polar ecosystems, and all these and other effects will alter marine trophic webs and habitat, with associated declines and extinctions of species. Experience to date indicates that we are limited in our collective ability to predict the nature and rate of these changes and ill-prepared to address them. Theme 4 in the current plan only begins to touch on the threat of climate change to current marine ecosystems.

Jerry Miller, Ph.D.
17 July 2009
Page 2

The second point pertains to implementation. Although the current plan includes a section on implementation, it is not clear to the Commission that agencies and organizations have truly embraced this new guidance and incorporated it into their budget and planning processes. Perhaps it is too early to tell how the guidance in the plan will be realized through agency action. Nonetheless, this is where the Commission believes the real challenge lies. If the wisdom in this plan is not adopted and incorporated into the work of the agencies, then the effort and thought that went into its original development and that will go into its revision will be for naught—it will have been an exercise in process without substantive benefit to the oceans and associated human endeavors.

Please contact me if you have questions regarding these comments or if the Marine Mammal Commission can do anything to facilitate the further development and use of this plan.

Sincerely,



Timothy J. Ragen, Ph.D.
Executive Director