



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL OCEAN SERVICE
Office of National Marine Sanctuaries
1305 East-West Highway
Silver Spring, Maryland 20910

Dr. Arati Prabhakar
Director, Office of Science and Technology Policy
1650 Pennsylvania Avenue NW
Washington, DC 20502

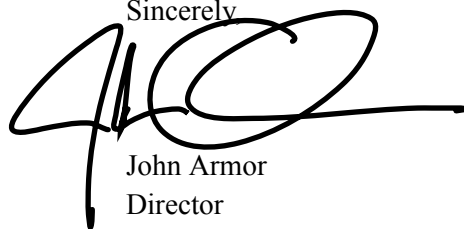
Dear Dr. Prabhakar:

Enclosed for your consideration, I am forwarding a letter from the Sanctuary System Business Advisory Council (council) with input on the National Strategy for a Sustainable Ocean Economy. Informed by public comment and council deliberation, the enclosed public comment expresses the council's thoughts and ideas on the development of the National Strategy.

NOAA's Office of National Marine Sanctuaries (ONMS) created this council in 2013 to provide advice and recommendations regarding the relationship of ONMS with the ocean business community. Under the current charter, the focus of the group is on marine-based sustainable recreation and tourism. The members of the council include representatives from travel and tourism, hospitality, recreation, recreational fishing, marketing, conservation, equitable access, corporate foundations, and other similar businesses, for a total of fifteen members. The opinions and findings of this comment do not necessarily reflect the position of the NOAA or any of its subcomponents.

If you have any questions please contact the Deputy Director of the Office of National Marine Sanctuaries at monique.baskin@noaa.gov.

Sincerely



John Armor
Director

Enclosure: BAC Sustainable Ocean Economy Letter approved on August 25, 2023 by the Sanctuary System Business Advisory Council, including associated voting record.



National Marine Sanctuary System Business Advisory Council

Voting Members

Betsy López-Wagner, Co-Chair
Communications & Marketing
Equitable Experiences

Richard Loomis, Co-Chair
Communications & Marketing

Taishya Adams
Equitable Access

Maite Arce
Equitable Access

Vipe Desai
Recreation

Marie Fukudome
Tourism

Greg Jacoski
Conservation

Greg Klassen
Communications & Marketing

Joost Ouendag
Tourism

Sherry L. Rupert
Natural & Cultural
Resource Management

Keith Shattenkirk
Conservation

Jessica Turner
Recreation

Stephanie Vatalaro
Recreational Fishing

August 25, 2023

Dr. Arati Prabhakar
Director, Office of Science and Technology Policy
1650 Pennsylvania Avenue NW
Washington, DC 20502

Re: National Strategy for a Sustainable Ocean Economy

Dear Dr. Prabhakar,

Our nation has a vital role to sustainably and equitably determine how it will foster an unwavering commitment to our ocean and the communities and ecosystems – above and below water – who depend on it.

A healthy ocean is a right we cannot deny to those who call this nation home, nor those who experience the consequences of our actions and inactions.

We, the Business Advisory Council, a national advisory body to the director of NOAA's Office of National Marine Sanctuaries, write to you in our Council's shared belief that the National Strategy for a Sustainable Ocean Economy must also include a systematic approach to ensuring ocean justice, as is being considered in the White House's *Ocean Justice Strategy*, while weaving in its *Ocean Climate Action Plan*, with pillars including but not limited to nature-based solutions such as climate adaptive marine protected areas (MPAs) with greater protections, and the conservation of at least 30 percent of U.S. lands and waters by 2030, as described in the March 2023 report by the Ocean Policy Committee.

We also recognize the need for equitable access and experiences to the ocean and coasts, and the necessity for a just transition to allow for a carbon-neutral future, with good paying jobs and job training, and more meaningful engagement with our communities with cultural connections and in the languages of their ancestral homelands. We emphasize the importance of a racially, ethnically, culturally and gender diverse workforce, inclusive of multigenerational individuals of all backgrounds, along with additional opportunities for those of marginalized backgrounds and identities, as well as neurodivergencies.

Given our coasts and ocean are essential climate solutions – and the ocean as our powerful buffer against the climate crisis – we must remain steadfast in accelerating *just* practices over extractive commercial industries which pose harm to human health and marine ecosystems. And we elevate the social and economic benefits of successfully managed marine protected areas for sustenance, livelihoods, destination tourism, and places to recreate and find joy.

Considering the importance of the U.S. economy, stock market, financial institutions, trade and development policies, we believe a multi-pronged national approach to address ocean and climate injustices and a sustainable ocean economy through regulatory and compulsory measures is well overdue.

Coastal communities in the U.S. are home to over 128 million people, or almost 40 percent of our nation's population. According to NOAA's *U.S. Ocean and Great Lakes Economy report*, "Tourism and recreation was the top employer in the ocean economy with 2.3 million employees. This sector also contributed \$116 billion in gross domestic product, the highest of all the ocean and Great Lakes economy sectors." And the [New Blue Economy](#) findings from NOAA further express how our economy is interwoven

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with U.S. coasts. If our “coastal counties were an individual country, they would rank third in the world in GDP, surpassed only by the United States and China. The prosperity and security of this nation is therefore predicated on the understanding, health, and sustainable use of our ocean, coasts, and Great Lakes.”

We strongly encourage the Office of Science and Technology Policy to consider the following responses as we seek to inform on a.) a Sustainable Ocean Economy, b.) Ocean Coasts and Great Lakes Priorities, c.) an Informed and Responsive National Strategy, and d.) Additional Considerations as follows:

1. Sustainable Ocean Economy:

- Prioritize funding and programming to ensure equity in access and quality of experience for all communities; increase efforts regarding workforce development within ocean and coastal economies (partnership development with institutions, business, etc.); expand the National Marine Sanctuary System (prioritize approving those in the inventory currently and establish new sanctuaries, especially those from historically excluded communities); increased funding for the Office of National Marine Sanctuaries to manage the resource(s).
- Prioritize activities compatible with resource protection over extractive commercial industries with a ban on deep-sea mining and bottom trawling – as this risks potential irreversible damage to marine ecosystems and further accelerates climate change by way of exploitative practices.
- An all-government approach also requires addressing illegal, unreported and unregulated fishing (IUU) and the human rights atrocities associated with this activity – we must think and act globally as we consider a sustainable strategy which includes transparency, traceability, and our ability to best consider the supply chain, sourcing, labeling and such related matters.
- Defining National Marine Sanctuaries (Sanctuaries) as a primary driver of destination stewardship based tourism, serving as a catalyst for further tourism investments. By virtue of its ability to drive careful and community-oriented economic development, the source of that economic driver must be protected, in addition to the ecological importance of Sanctuaries and marine conservation.
- Creating public experiences that benefit the local economy and promote the responsible use of sanctuary resources (for example the [Blue Star operator program](#) at Florida Keys National Marine Sanctuary).
- Creating economic models for tourism in the sanctuaries and the communities bordering them requires an inventory of all invested communities: local residents and business, any scientists working in the sanctuary, suppliers of tourism infrastructure (operators, hospitality coach companies, equipment rental companies) and tourism product planners. All must be engaged in the development and delivery of an equitable and inclusive experience to ensure those community members and travelers are invested in the preservation and sustainable use of resources in the sanctuaries.
- As it related to infrastructure in the Strategy’s planning: Prioritize inclusive water access from boat lifts, launches, marinas, recreational fishing areas with a focus on bolstering and supporting coastal recreation economies including tourism, and the recruitment and retention of other industries and employees.

2. Ocean, Coasts, and Great Lakes Priorities

- The work done by NOAA’s Office of National Marine Sanctuaries to protect the natural and cultural resources of the sanctuaries and marine national monuments within its jurisdiction itself can be of great interest to visitors – whether sanctuary community members or travelers. Seeing scientists going about their business, these individuals can engage with research and possibly

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become community scientists – deepening their understanding and their care for the sanctuaries. The scientific rigor with which any research needs to be conducted doesn't preclude the public's participation, it heightens their enjoyment: meaning people from all ages and backgrounds can participate.

- Ensure the Tribes, Native Hawaiians and Indigenous communities are actively engaged in discussions and policies affecting the lands and waters of their ancestral homelands and waters. Amplify these connections in interpretation of these areas. Ensure that Native communities, especially youth and elders are included in activities within the sanctuaries. Advance Federal designations of lands and waters in the United States and its territories that can help protect the cultural, environmental, and economic resources within and around them.
- Advancing designations across the Great Lakes to safeguard cultural heritage, elevate Indigenous waterscapes in the Great Lakes and the ocean that are inclusive of narratives and traditional ecological knowledge as vital living history of the area(s) and its Peoples.
- Increase funding for communications activities, create regional partnerships with schools, tribal colleges, and universities, visitor bureaus in proximity to National Marine Sanctuaries and marine national monuments, and ultimately to support learning and economic opportunities and a destination stewardship network.
- Advance work with two present day National Marine Sanctuaries in the Great Lakes, Wisconsin and Michigan specifically, and allocate increased funding for NOAA to invest further in Wisconsin Shipwreck Coast National Marine Sanctuary via a potential permanent or pop-up visitor's center, and other funding for efforts such as public service announcements (PSAs), and other activity with Thunder Bay National Marine Sanctuary to create additional Great Lakes tourism opportunities.

3. An Informed and Responsive National Strategy

- We need baseline data to measure success and seek the prioritization of research to answer the question, "How equitable are our coastlines and ocean for access now?"
- We also need to continue to do work to appeal to more racially and ethnically diverse audiences. Right now, outdoor participation overall is growing in this kind of diversity, but as a whole, many racial, cultural and ethnic groups are still underrepresented ([Outdoor Foundation 2023 Participation Trends report](#)). If we want to create a robust, equitable, secure, sustainable ocean economy, we need to engage younger and more diverse audiences who will become the professionals who work to support our ocean and become the enthusiasts who will act as caretakers and become donors to marine conservation and the likes.

Further, in a 2022 Azul [U.S. Latinos and the Ocean Poll](#), conducted by Barreto Segura Partners (BSP):

- 86% of U.S. Latinos believe the government has a responsibility to preserve the ocean and public lands for the enjoyment of future generations
- 87% say that Congress should create new national parks, national monuments, national wildlife refuges and tribal protected areas to protect historic sites or areas for outdoor recreation
- Technology in monitoring systems continues to advance, providing more opportunity for information than ever before. Prioritize developing an assessment of ocean resources (fisheries, habitat, water quality, etc.) in regions of the ocean where people want to engage (coasts, sanctuaries, underwater structure, etc.) and how human interactions can affect the resource. The data will provide insight into who, where, when, and how people can sustainably interact with

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ocean resources.

- Policies should be set to allow for the maximum sustainable use in marine protected areas, or – better yet – establish highly and fully protected special places, where it is most beneficial for the communities and ecosystems that depend on them to ensure Sanctuaries are not sanctuaries in name only. Once the use allowance is established, effort should be made to promote the ocean resources and encourage people to participate. This could include developing content to show people the programs, resources and activities which are available, maintaining infrastructure that provides responsible and equitable access, and developing programs that grant access to historically excluded individuals.

4. Additional Considerations

To help achieve marine and coastal resilience, ecosystem health, sustainable economies, and inclusive and accurate narratives of coastal communities, we strongly suggest the National Strategy for a Sustainable Ocean Economy include specific funding for a Communications campaign and public engagement to make the public aware of the importance of a sustainable ocean economy, ocean justice strategy, and to further highlight the robust work of NOAA – in particular the role of National Marine Sanctuaries – as one of our best defenses to the consequences of the climate crisis.

Additionally, we recommend the use of the community-derived definition of ocean justice be utilized for the National Strategy for a Sustainable Ocean Economy. The definition, as reached by consensus by 18 organizations – inclusive of frontline and mainstream environmental groups – in affiliation with the [Ocean Justice Forum](#) is as follows, “Ocean Justice exists at the intersection of social inclusion, ocean stewardship, and justice. It harnesses a power shift advancing the voices, full participation and leadership of historically excluded Peoples and Black, Indigenous, people of color (BIPOC) communities in ocean decision-making, ensures meaningful and equitable engagement of all communities, and delivers equal access to healthy and prospering shorelines and the ocean for all.”

On behalf of the Business Advisory Council, we submit these comments for consideration and thank you for your review.

Our best,



Betsy López-Wagner, Co-Chair
Business Advisory Council



Richard Loomis, Co-Chair
Business Advisory Council

cc: John Armor, Director, NOAA Office of National Marine Sanctuaries
Monique Baskin, Deputy Director, NOAA Office of National Marine Sanctuaries

Enclosure: Advisory council voting record on the motion supporting this letter.

The Business Advisory Council is a national advisory body to the director of NOAA’s Office of National Marine Sanctuaries. The opinions and findings of this publication do not necessarily reflect the position of the Office of National Marine Sanctuaries and the National Oceanic and Atmospheric Administration. Learn more about our membership, [here](#).

National Marine Sanctuary System Business Advisory Council

ENCLOSURE: Voting Results: Sanctuary System Business Advisory Council letter for public comment on the development of a National Strategy for a Sustainable Ocean Economy on August 25, 2023.

Name	Business Advisory Council Seat	Vote on letter (yes, no, abstain)
Betsy López-Wagner	Communications and Marketing	Yes
Richard Loomis	Communications and Marketing	Yes
Greg Jacoski	Conservation	Abstain
Greg Klassen	Communications and Marketing	Yes
Jessica Turner	Recreation	<i>absent</i>
Joost Ouendag	Tourism	<i>absent</i>
Keith Shattenkirk	Conservation	Yes
Sherry Rupert	Natural & Cultural Resource Management	Yes
Maite Arce	Equitable Access	Yes
Stephanie West Vatalaro	Recreational Fishing	Abstain
Taishya Adams	Equitable Access	Yes
Marie Fukudome	Tourism	<i>absent</i>
Vipe Desai	Recreation	Yes
<p><i>The following NOAA Office of National Marine Sanctuary's Business Advisory Council resolution passed August 25, 2023 with 10 voting members present, of which 8 were in favor of comment letter approval and submission. The following individuals abstained from voting.</i></p>		