



April 8, 2021

The Honorable Deb Haaland
Secretary
U.S. Department of the Interior
1849 C Street, NW
Washington, DC 20240

Submitted electronically via niea@ios.doi.gov

RE: 30x30 Initiative

Dear Secretary Haaland:

The National Ocean Policy Coalition (“NOPC” or “Coalition”) is pleased to offer comments and recommendations on external outreach and implementation associated with the administration’s 30x30 conservation initiative directed by Section 216(a) of the President’s January 27, 2021 Executive Order on “Tackling the Climate Crisis at Home and Abroad.”¹

The Coalition is an organization of diverse interests representing sectors and entities that support the development and implementation of sound, balanced ocean policies that recognize and enhance the critical role that our oceans, coastal areas, Great Lakes, and marine and terrestrial ecosystems play in our nation’s economy, national security, culture, health, and well-being while conserving the natural resources and marine habitat of our ocean, coastal, and Great Lakes regions for current and future generations. Coalition members span the Blue Economy and include interests ranging from fishing and energy to waterborne transportation and beyond that depend on ocean access to provide the nation with economic and societal benefits.

As to outreach, NOPC recommends a multi-faceted national and regional-level approach that closely engages key groups including commercial and recreational interests. At the national level, given NOPC’s representation of sectors from across the Blue Economy and vast network of commercial and recreational marine stakeholders from across the country, the Coalition urges the administration to engage NOPC as a resource for direct input from commercial and recreational marine interests. Furthermore, NOPC offers itself and encourages the administration to utilize the Coalition as a national-level convenor for facilitating discussions with industry and disseminating information about the 30x30 initiative to key commercial and recreational stakeholders. Additionally, NOPC urges the administration to make use of existing entities such as the NOAA Science Advisory Board and U.S. National Committee for the UN Decade of Ocean Science to solicit input on 30x30.

¹ See January 27, 2021 Executive Order on Tackling the Climate Crisis at Home and Abroad,” *accessible at* <https://www.whitehouse.gov/briefing-room/presidential-actions/2021/01/27/executive-order-on-tackling-the-climate-crisis-at-home-and-abroad/>.



In order to effectively engage key stakeholders at the regional level, NOPC encourages the administration to leverage existing groups including regional ocean partnerships such as the Gulf of Mexico Alliance, regional fishery management councils, and sanctuary advisory councils.

Effective stakeholder engagement will be critical to ensuring a well-informed process grounded in sound science, including the development of criteria for U.S. waters and lands deemed “conserved” and the identification of areas that have already attained such status. With the significant conservation efforts and achievements by both the public and private sector in the United States over the years, it will be essential to fully account for such achievements in order to accurately define the current state of progress toward meeting the 30x30 goal.

In that regard, it will be vital to account for non-marine protected area regulatory actions that produce conservation benefits, such as bottom trawl gear prohibitions and other fisheries closures to protect coral reefs, sensitive habitats, and protected species in area-based conservation measures under Magnuson-Stevens authority, as well as other industry initiatives that provide environmental benefits. A science-based assessment to identify areas already meeting conservation status – including by leveraging the results of the ongoing U.S. interagency mapping, exploration, and characterization initiative and private sector innovation and technology -- will be key to effectively enhancing understanding of marine areas already being conserved and measuring future progress toward meeting conservation goals. Additionally, it will be important to account for the environmental justice aspect of the 30x30 goal, including by ensuring protection of community benefits received from the Blue Economy and the jobs and economic and societal benefits associated with it.

Going forward, providing for an open and transparent process will be key to securing an outcome that achieves the stated conservation goals without unnecessarily constraining opportunities associated with the Blue Economy. The process which led to the recent expansion of the Flower Garden Banks National Marine Sanctuary is a textbook model for how to successfully engage stakeholders in a manner that ultimately achieves consensus among multiple groups with varied interests. Thus, to the extent that the administration seeks to utilize regulatory tools to implement the 30x30 initiative, NOPC strongly urges the use of statutorily-authorized processes that provide for flexibility in management decisions, and specifically encourages the administration to use the National Marine Sanctuaries Act and Magnuson-Stevens Act rather than the Antiquities Act in any area-based marine conservation or protection given their strong transparency and procedural safeguards that help ensure robust opportunities for public input.

NOPC appreciates your consideration of the feedback herein and looks forward to opportunities for continued engagement on this initiative.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Belcher", is placed over a light gray rectangular background.

Jack Belcher
Managing Director