

Website Comments Received 6/10/2011-6/17/2011

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Ecosystem-Based Management

Name

Kathleen Menke

Organization

Which Priority Objective would you like to provide comment on?

Ecosystem-Based Management

Comment

I fully support ecosystem-based management of Alaska's coastal waters. I fully support water quality and sustainable practices on land. Thank you.

Attachment:

Name

Edward Thomas

Organization

Craig Community Association

Which Priority Objective would you like to provide comment on?

Ecosystem-Based Management

Comment

First Comment would be that within the document there is no reference to how Tribal Consultation would be handled from the beginning of the process to the implementation of the Strategic Plan? Second that within SE Waters of Alaska there were Sea Otters planted prior to the Marine Mammals Protection Act with no management strategies identified on this species on the State of Alaska or the Federal side. These species have escalated to number that are out of control. They have branched out into several colonies throughout SE Alaska consuming mass consumption of Clams, Abalone, Dungeness Crabs, king Crabs, Mussels, Kelp, Geoducks, etc. and in some areas killing off shell fish stocks. The Public, Communities, and Tribes that rely on these resources for survival are at high risk socially and economically from the SE Sea Otter consuming resources that use to be in abundant to have a sustainable lifestyle. We need the governments assistance in getting this problem resolved so both the Sea Otters and the Public can survive in these areas that are inundated with Sea Otters.

Attachment:

Name

David Dow

Organization

Grassroots Environmental Activist from Cape Cod

Which Priority Objective would you like to provide comment on?

Ecosystem-Based Management

Comment

I read through the draft Strategic Action Plan for Ecosystems-based Management and it was unclear to me what the operational definition is for EBM. Even within the National Oceanic & Atmospheric Administration which is a proponent of EBM, there appear to be multiple approaches to EBM in managing living marine, protected and natural trust resources; managing human activities, while protecting biotic and cultural resources within National Marine Sanctuaries/Estuarine Research Reserves; establishment of the rules guiding Marine Protected Areas and "no take marine reserves"; etc. It is hard for me to see progress being made being made between multiple state/federal agencies and their constituents until an operational definition is developed for adaptive, Ecosystems Based Management (a, EBM). Currently this term means different things to various governmental agencies and constituent groups. The general public probably doesn't have a clue on what a,EBM entails. The same situation applies to operationally defining what "adaptive management" really means. Here on Cape Cod the "adaptive management" approaches in our Comprehensive Wastewater Management Plans (CWMPs) for our state mandated nutrient load reduction requirements to improve coastal water quality differ by town. The towns are required to upgrade their level of wastewater treatment from septic systems to more advanced centralized treatment plants with sewers or decentralized alternatives (ecotoilets in homes, community cluster systems in small developments, shellfish aquaculture, inlet widening, permeable reactive barriers on the shoreline, etc.). The "adaptive management" regime envisioned under the Massachusetts Ocean Management Plan (MOMP) for state Ocean Act jurisdictional waters (0.3 to 3 miles off of the coast) is something entirely different than the approach envisioned in the town wastewater CWMPs. Many scientists and some planners are concerned about the "resilience" concept in the face of climate change effects on land and within the ocean (component of adaptation). The "Resilience Alliance" views the interaction between human stressors in the ocean and the natural ecological/socioeconomic system as a complex, dynamic system with nonlinear dynamics (hysteresis response- i. e. the loss of eelgrass to excess nutrient loading trajectory in time/space differs from the recovery pathway following nutrient reductions). This view differs dramatically from the normal steady state or equilibrium modelling approaches utilized by state/federal natural resources management and environmental agencies. Most of the traditional modelling approaches can't predict the "shifting baseline" phenomenon that we see emerging in the ocean from a combination of human activities. The devil is in the details when operationally defining EBM and adaptive management and its implications on balancing human uses in the ocean with environmental protection/conservation of cultural resources. I would like to see the operational definition of EBM and adaptive management be made a near term priority for this Strategic Action Plan (SAP). The fact that the Northeast Regional Ocean Council doesn't operate under FACA will inhibit the required dialog between the public, user groups, independent scientists and environmental NGOs with the state/federal natural resource/environmental agencies. The National Ocean Council may want to consider the "collaborative learning" model as way to promote this dialog. The approach was utilized by the Canadian Department of Fisheries & Oceans (DFO) in developing the Eastern Scotian Shelf Integrated Management Plan (ESSIM). An alternative public outreach approach would be to compare different aEBM scenarios for the federal jurisdictional waters (3-200 miles) that would explore the implications of different operational definitions on the use and environmental protection/cultural conservation in the ocean.

Attachment:

Name

Mark Hughes

Organization**Which Priority Objective would you like to provide comment on?**

Ecosystem-Based Management

Comment

The scope of the National Ocean Policy and the 9 strategies are too broad and too large to hope to be successful. Select much more narrow scope and size of objectives. All of this needs to have zero impact on net Federal expenses. In other words, if this work costs \$40 billion, then \$40 billion in expenses must be reduced somewhere else in the Federal government. An example would be that NOAA and the EPA both cut their actual expenses by \$20 billion in order to finance \$40 billion for the National Ocean Policy. Recreational needs must be on par with commercial, regulatory or any other interest.

Attachment:

Name

Mark Mendelsohn

Organization

Which Priority Objective would you like to provide comment on?

Ecosystem-Based Management

Comment

I truly hope that Sustainable Seafood Harvesting and Reducing Offshore Oil Drilling are TOP priorities within this or another Objective. Thank you!

Attachment:

Name

Terence Roberts

Organization**Which Priority Objective would you like to provide comment on?**

Ecosystem-Based Management

Comment

Gee. I wanted to comment on ALL of the above objectives, each one of them is just. another government grab and over reach on us all. In my opinion, everything you touch you botch or ruin. Stay out of the ocean. It's really doing fine without the government regulation. Hopefully, in 2012 this "too much government management problem" will be corrected. Sincerely, Terence Roberts

Attachment:

Coastal and Marine Spatial Planning

Name

Bradford Brown

Organization

Which Priority Objective would you like to provide comment on?

Coastal and Marine Spatial Planning

Comment

The development and now implementation of the National Ocean Policy is a signature achievement for this Administration and all who are involved need to be commended. When I read the Policy I was please to see on pages 51 and 52 commitment to the Large Marine Ecosystem Approach: "Therefore, for CMSP purposes, the United States would be subdivided into nine regional planning areas based on LMEs, with modifications as necessary to ensure inclusion of the entire U. S. EEZ and Continental Shelf and to allow for incorporation of existing state or regional ocean governance bodies. " This recognized the need for the areas to be science based and the many years of scientific efforts particularly at AAAS meetings to develop the LME approach. However I was disappointed in not seeing this language in the outline for the strategic plan for the section on Coastal and Marine Spatial Planning component and urge that it be included so that the underlying basis is science modified as necessary rather than allowing it to lapse back to political boundaries being primary.

Attachment:

Name

Monty Hawkins

Organization**Which Priority Objective would you like to provide comment on?**

Coastal and Marine Spatial Planning

Comment

Making the oceans properous AND protected will require fantastic assemblages of data. This is clearly NOC's job -- and a critical one. Monty Hawkins

Attachment:

Name

David Dow

Organization

Cape Cod Grassroots Environmental Activist

Which Priority Objective would you like to provide comment on?

Coastal and Marine Spatial Planning

Comment

Here on Cape Cod there are three federal planning processes occurring in the adjacent ocean. The Bureau of Ocean Energy Management, Regulation and Enforcement (BOEMRE) State Task Force (state/federal agencies) is developing a 1300 square mile zone for developing large scale wind farms. The New England Fishery Management Council (NEFMC) is developing a new Omnibus Habitat Amendment for its 27 managed species which will recommend a number of large Habitat Areas of Particular Concern (HAPCs) in state/federal jurisdictional waters adjacent to Cape Cod. The NEFMC and NOAA Fisheries (NMFS) already have large fisheries management/closure areas off of our coast in the Nantucket Light Ship area and on Georges Bank. NMFS has designated critical habitat regions for the endangered North Atlantic Right Whale (NARW) in Cape Cod Bay and the Great South Channel. Nantucket Sound will contain community wind turbines (Cape Cod Commission Ocean District of Critical Concern); the state/federally permitted Cape Wind project; and Barnstable and Falmouth would like to have ocean outfalls for their upgraded, advanced wastewater treatment plants. The waters surrounding Cape Cod are used for navigation into Boston Harbor; recreation; commercial and recreational fishing; aquaculture; and contain many historical ship wrecks. My worry is that there is limited public and local government input to these federal planning efforts (most of which are not organized under FACA requirements to ensure independent scientific advice and proactive public input). The BOEMRE Large Scale Wind Farm region had to be down sized from 3000 to 1300 sq. mi. following complaints from the fishing industry. I am not anxious to see a repeat of this divisive process when the NEFMC releases its new Habitat Amendment with extensive HAPC regions or when the Northeast Regional Ocean Council (NROC) implements its Coastal and Marine Spatial Planning Strategic Action Plan. We need better integration between the federal/state/Cape Cod Commission planners combined with proactive input from the public/user constituencies. As a grassroots environmental activist I would like to see some Marine Protected Areas (including "no take marine reserves") implemented in our adjacent federal jurisdictional waters. One "no take marine reserve" should be created in the area where the Stellwagen Bank National Marine Sanctuary overlaps with the adjacent NEFMC groundfish closure area. This region could be used as a control area to examine changes in the SBNMS biological resources that are being impacted from fishing, climate change, invasive species, MWRA (Massachusetts Water Resources Authority) ocean outfall and nonpoint toxic pollution from the atmosphere. Without a control area, the present monitoring program within the SBNMS is unable to detect the "shifting baseline" in our environment that is probably due to the combined effects of climate change and fishing. The "no take marine reserve" and the rest of the "groundfish closure area" could separate out these effects on the biological resources in the water column and on the bottom. The SBNMS Science Advisory Panel has a plan to support this endeavor. I will let other constituents/NGOs comment on how to balance use with environmental protection/conservation of historical artifacts in our coastal waters. This is obviously a major challenge, since all of the federal/state agencies have their own constituent groups which pose challenge to coming up with an integrated ocean zoning program for the ocean areas off of Cape Cod. I am sure that other parts of the country face similar challenges. Climate disruption has already impacted our natural ecosystems on land/in the water and socioeconomic underpinning (difficulty in buying homeowners insurance in the private market and minimum of 5% wind deductibles).

Attachment:

Name

Lenore Alpert

Organization

Florida Ocean Alliance

Which Priority Objective would you like to provide comment on?

Coastal and Marine Spatial Planning

Comment

On behalf of the Florida Ocean Alliance, attached is the recent report and flyer on Marine Spatial Planning in Florida.

Attachment:

Name

Mark Hughes

Organization**Which Priority Objective would you like to provide comment on?**

Coastal and Marine Spatial Planning

Comment

The scope of the National Ocean Policy and the 9 strategies are too broad and too large to hope to be successful. Select much more narrow scope and size of objectives. All of this needs to have zero impact on net Federal expenses. In other words, if this work costs \$40 billion, then \$40 billion in expenses must be reduced somewhere else in the Federal government. An example would be that NOAA and the EPA both cut their actual expenses by \$20 billion in order to finance \$40 billion for the National Ocean Policy.

Attachment:

Name

Harrigan Logan

Organization

Which Priority Objective would you like to provide comment on?

Coastal and Marine Spatial Planning

Comment

Thank you, Mr. President. Everything you do to preserve our precious Earth is deeply appreciated by not only the generations living now, but to come. Please don't drill for oil in the Arctic but embrace clean green energy instead. I believe in my heart, that is what you truly want to do, in your heart for your children's sakes. Keep up the great work! I'm votin' for ya next year.

Attachment:

Name

Harrigan Logan

Organization

Which Priority Objective would you like to provide comment on?

Coastal and Marine Spatial Planning

Comment

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Attachment:

Name

Tom Herlihy

Organization

Which Priority Objective would you like to provide comment on?

Coastal and Marine Spatial Planning

Comment

As a graduate of Cal Poly San Luis Obispo, Ca, and as a resident of the County which is on the "coast", I was interested to read what this council was about. All I can say is "WTF"? All I understood was, "blah, blah, blah, let conservationist make the decisions, blah, blah, create a council for the council of councils, blah, blah, overpay writers, blah, blah, shut down more coastlines. Thank you for being an idiot.

Attachment:

Name

Elaine Vogel

Organization**Which Priority Objective would you like to provide comment on?**

Coastal and Marine Spatial Planning

Comment

I feel the California coast needs to be opened up to oil drilling. Not go crazy and drill like crazy, but come to terms with the environmentalists and do some drilling. We are basically shut down from drilling, and there has to be some resources out there to help our current oil situation.

Attachment:

Name

Jeff Houston

Organization

Taxed Voting People of America

Which Priority Objective would you like to provide comment on?

Coastal and Marine Spatial Planning

Comment

From reading most of this collection of words (lots of them really not saying much in the end), I gather this administration intends to not realistically going to go for any off shore national resources. It looks like drilling for oil isn't an important factor for helping to keep our failing economy alive. All the economic wealth this report touts doesn't seem to understand that fuel gets people to the coastal areas. I have lived right on the coast of California for all of my life. I love the ocean. I understand balance. But unless you can provide a more economic fuel to drive our economy, you had better start signing up fish and whales to vote in the next election. The people aren't going to go for this for much longer. A guy that watches ice melt in a study is not producing a product. His study is not a taxable product. In fact it costs our economy money! This whole project as written, looks like another H-U-G-E Government plan designed to spend money, prevent any economic growth, further flawed economic and political beliefs in the cloak of environmentalism. Like the battery driven "Green" cars, the initial thrust of this program looks like a good idea, but when you play out the timeline, there are poor results. What are we going to do with all of the used batteries from these cars, mix them into our soiled green? Lots of time has been spent on this with this ocean panel, let's make sure ideas are balanced and from both sides meeting in the middle - reality.

Attachment:

Inform Decisions and Improve Understanding

Name

Bradford Brown

Organization

Which Priority Objective would you like to provide comment on?

Inform Decisions and Improve Understanding

Comment

I am very pleased to see the detailed devoted to STEM issues, particularly addressing under-represented populations. All too often a general statement is made with no further substance. I would suggest making specific reference to utilizing institutions addressing these populations such as Historically Black Colleges and Universities, Hispanic Serving Universities and Tribal Colleges. I also commend the extensive references to constituency involvement. I would suggest however including reference to those urban coastal population components which often have limited connection to the marine environment on their doorstep but are important voting constituencies which help determine policies having significant impact on the adjacent marine areas.

Attachment:

Name

Phil Cochrane

Organization

Which Priority Objective would you like to provide comment on?

Inform Decisions and Improve Understanding

Comment

I do not support this initiative as it seems to have a pre-determined outcome - how do we find a way to shut down activity along America's coast line. As an Alaskan, we know that we have more coastline here than any where else in the US combined. What may work in California, Florida or the Carolinas may have significantly different impacts in Alaska. I urge caution on this entire endeavor.

Attachment:

Name

Stuart Theis

Organization

United States Great Lakes Shipping Association

Which Priority Objective would you like to provide comment on?

Inform Decisions and Improve Understanding

Comment

Ladies and Gentlemen: I regret I will be unable to attend the June 13, 2011 listening Session in Chicago, but these comments are respectfully submitted to be part of the record and to be considered by the National Ocean Council, United States Coast Guard and EPA. My name is Stuart Theis. I am Executive Director of the United States Great Lakes Shipping Association ("USGLSA"). USGLSA consists of vessel agents located in the principal cities all around the Great Lakes serving primarily foreign flag vessels calling at Great Lakes Ports. While we do not represent the vessel operators directly, matters affecting them regarding issues in the Great Lakes/St. Lawrence Seaway System are of vital interest to our members. While I chose Point 3 of the proposed Strategic Action Plan to address, Point 4 may also be part of these comments. Our specific comments are 1) To urge BALANCE between sometimes competing environmental and commercial interests in the policy determinations which will emerge from this process. The tone, emphasis and content of much of the work so far which has been observed appears to lack that balance. If that apparent bias is represented in the final determinations, it will only serve to weaken the prospects for an effective broad strategy. We respectfully urge that there be more focus on pursuing policy which harmonizes the interests of all players in a clear and material way. 2) Need to identify Great Lakes issues in a more visible and material manner. Obviously, the Great Lakes are not as vast a subject as the oceans of the world which may affect our Country. However, this "North Coast" of the US which we share with Canada, the world's largest freshwater resource, serving millions of Americans who live and work there. We again most respectfully suggest that this subject needs to be more fully addressed in the work. Put simply, while the words, "and the Great Lakes" appears in most of the descriptive material covering this current enterprise, the content of what is actually written appears to be marginal. Whether that is because of a perceived relative unimportance compared to other geographic locations addressed or perhaps a lack of knowledge of the national importance of a Great Lakes commercial and recreational resource, it is not known. USGLSA had the opportunity to participate in the early phases of this enterprise through the preliminary work done by the Ocean Policy Task Force which has resulted in the 9 Strategic objectives. By letter dated October 29, 2009, we submitted comments and recommendations. By way of providing some ideas and subjects to consider which would help provide more balance to the current work product and to highlight Great Lakes in particular, please consider the following issues of concern to USGLSA (obviously the commercial side) which were more detailed in the October 29 letter: 1) NEED FOR UNIFORM ENVIRONMENTAL STANDARDS ON THE LAKES - Currently vessel operators are faced with a crazy quilt of Federal and State regulatory requirements particularly as to ballast water but also as to air emissions and other environmental conditions. The vessel industry recognizes and supports environmental regulatory action in these areas. It is just that it has become so complicated and burdensome as to cause shippers to consider other transportation modes. RECOMMENDATION - Strategy should be considered to include promotion of uniform regulatory conditions on the Lakes. 2) INCREASE DREDGING OF LAKES, RIVERS AND HARBORS - Currently the U. S. Army Corps of Engineers has suffered severe cuts in its dredging budget, resulting in the lowest allocation of funds for Lakes dredging which can ever be recalled. This condition exists despite literally billions of dollars sitting in what is known as the Harbor Maintenance Trust Fund controlled by Congress which is funded by harbors around the nation including the Lakes. Failure to dredge means ships cannot carry full cargoes which in turn can result in navigational risks and in higher costs to customers. RECOMMENDATION. Include in Strategy the importance of dredging harbors and rivers to proper depth to assure a vital maritime commerce in the Lakes and elsewhere. 3)

ENCOURAGE AND DEVELOP GREATER USE OF THE LAKES AND OTHER NATIONAL WATERWAYS THROUGH SHORT SEA SHIPPING AND RELATED CONCEPTS USING MARINE TRANSPORTATION. It is currently the well and widely expressed U. S. transportation policy to promote programs to find alternatives to surface transportation, especially trucks in the U. S. ,resultng in reduced air pollution, road congestion, safety issues and oil consumption. Maritime operations provide that alternative. There are already a few examples of the use of short sea shipping alternative to trucks or rail such as the water traffic now established between New York and Boston. In Europe and around the world, the use of water resources as a transportation mode is vastly greater than in North America. RECOMMENDATION,,,In order to support our coasts and harbors as well as provide the environmental benefits it adds, the Strategy should consider short sea shipping as an element. USGLSA and I thnak you for the oportunity to address these matters. We stand ready to discuss these or other related maritime issues. Respectfully submitted, Stuart H, Theis Executive Diretor United States Great Lakes Shipping Association

Attachment:

Name

Benjamin Martin

Organization

USCG

Which Priority Objective would you like to provide comment on?

Inform Decisions and Improve Understanding

Comment

It seems to me that there are several agencies, co-ops, private enterprises involved in the gathering and dissemination of information useful to development of Best Work Practices (BWP). If these BWP were put into organized and systematically updated databases and made available to those who provided to them it would support, potentially, shared interest in the overall processes that affect individual interests. Tax breaks to those companies or private enterprises who sustain a constant flow of workable knowledge that leads to additional BWP may also be an avenue to reach out and gain better and more accurate data.

Attachment:

Name

Mark Hughes

Organization**Which Priority Objective would you like to provide comment on?**

Inform Decisions and Improve Understanding

Comment

The scope of the National Ocean Policy and the 9 strategies are too broad and too large to hope to be successful. Select much more narrow scope and size of objectives. All of this needs to have zero impact on net Federal expenses. In other words, if this work costs \$40 billion, then \$40 billion in expenses must be reduced somewhere else in the Federal government. An example would be that NOAA and the EPA both cut their actual expenses by \$20 billion in order to finance \$40 billion for the National Ocean Policy. Recreational needs must be on par with commercial,regulatory or any other interest.

Attachment:

Name

Jason Luna

Organization

N/A

Which Priority Objective would you like to provide comment on?

Inform Decisions and Improve Understanding

Comment

I think that the Objective of informing the public should be integral to each Objective, and not be placed into its separate category. The informed decisions that people are supposed to make will have broad impact on at least a large majority of the other Objectives.

Attachment:

Coordinate and Support

Name

Bradford Brown

Organization**Which Priority Objective would you like to provide comment on?**

Coordinate and Support

Comment

The development and now implementation of the National Ocean Policy is a signature achievement for this Administration and all who are involved need to be commended. In the Coordinate and Support section under F. Action 6 "Identify appropriate opportunities for engaging the international community about the National Ocean Policy", the international effort on Large Marine Ecosystems can play a critical role. Of immediate concern would be the Gulf of Mexico and the Caribbean. In the former, which we share with Mexico and Cuba the GEF supported Gulf of Mexico Large Marine Ecosystem Project which includes the US provides a mechanism to address the entire Gulf of Mexico. In the latter the GEF funded Caribbean Large Marine Ecosystem Project provides a vehicle for addressing that region with the US Virgin Islands and Puerto Rico an intimate part and with its influence on South Florida and the Gulf of Mexico significant, in a holistic manner. All of the Large Marine Ecosystem Projects have a governance component. On the wider international scale two projects in Africa, the Benguela and Guinea Current LMEs have advanced to the stage where they have established interim Commissions which are setting up bodies with similarities to those being established under the USNOP. Likewise the Yellow Sea LME with China and Korea is establishing such a body and there, a funding mechanism to receive donor funds directly is in the process of being established. Thus the goals of the NOP and the LME international efforts are both similar and complementary and I urge that developing this linkage be mentioned in this section.

Attachment:

Name

Peter Becker

Organization

Pacific Aquaculture Caucus Inc.

Which Priority Objective would you like to provide comment on?

Coordinate and Support

Comment

In April 2010 the European Union started the coexist project (www.coexistproject.eu) with over \$5 Million (USD) in funding to meet the following needs: "Europe's coastal zones are of great socio-economic value, they are however also under pressure to balance competing activities and face potential conflict for space allocation. Stakeholder groups are diverse and represent diverse sectors, particularly fisheries, aquaculture, tourism, wind farm operation, and nature conservation in marine protected areas. Above all this is the requirement to preserve a valuable natural resource and meet environmental protection rules and regulations. This is the challenge the COEXIST project faces. " It is not amazing that they face the exact same challenges we do. It is amazing that we, a year later, are starting down the same path with no one mentioning their approach. COEXIST is not just a good idea, it is an anthem we need to be promoting in a country where ENGO's spent \$10's of millions of USD fighting the inevitable advance of aquaculture. Marine and terrestrial aquaculture will be necessary to feed the, now estimated, 10 billion people expected in less than previously estimated time. When even the livestock industry asks how we are going to feed 10 billion people (Feed Management Magazine www.feedmanagement-digital.com) and World Wildlife's Bryan Weech starts talking about a 50% increase in improvement in both grain and livestock output it beggars belief? No one is speaking about how to fill the 200,000 MT shortfall in protein production necessary to sustainably feed the 9 Billion (from previous) estimates let alone 10 billion. Aquaculture with FCR's of 2-3 for fish will have to be employed as FCR's of 16-20 for Beef and even 9-10 for swine simply will not produce enough protein with the feeds available. Further, growing things in the ocean lowers the water requirement to make the protein to far less than that for terrestrial agriculture of live stock for the same amount of feed stock. When marine algae are grown for feed stock carbohydrates the requirement can be reduced even further. It is ridiculous to engage re-discovering the wheel yet again when we can join with a successful program and make the international effort work to meet the goal. The COEXIST PROJECT offers a platform that will be over a year in action when we spend the first dollar on ours. we need to learn from their experience and join in their effort. not waste time and money in starting from scratch on our own.

Attachment:

Name

Mark Hughes

Organization**Which Priority Objective would you like to provide comment on?**

Coordinate and Support

Comment

The scope of the National Ocean Policy and the 9 strategies are too broad and too large to hope to be successful. Select much more narrow scope and size of objectives. All of this needs to have zero impact on net Federal expenses. In other words, if this work costs \$40 billion, then \$40 billion in expenses must be reduced somewhere else in the Federal government. An example would be that NOAA and the EPA both cut their actual expenses by \$20 billion in order to finance \$40 billion for the National Ocean Policy. Recreational needs must be on par with commercial, regulatory or any other interest.

Attachment:

Resiliency and Adaptation to Climate Change and Ocean Acidification

Name

Mark Hughes

Organization

Which Priority Objective would you like to provide comment on?

Resiliency and Adaptation to Climate Change and Ocean Acidification

Comment

The scope of the National Ocean Policy and the 9 strategies are too broad and too large to hope to be successful. Select much more narrow scope and size of objectives. All of this needs to have zero impact on net Federal expenses. In other words, if this work costs \$40 billion, then \$40 billion in expenses must be reduced somewhere else in the Federal government. An example would be that NOAA and the EPA both cut their actual expenses by \$20 billion in order to finance \$40 billion for the National Ocean Policy. Recreational needs must be on par with commercial,regulatory or any other interest.

Attachment:

Name

Capt Larry Lawhorn

Organization

EcoDelMar.org

Which Priority Objective would you like to provide comment on?

Resiliency and Adaptation to Climate Change and Ocean Acidification

Comment

. The Oceans are absorbing One Million TONS of CO2 PER HOUR from the atmosphere . - Ocean Acidification combined with worldwide industrial toxic dumping into rivers is killing the only Living Oceans in the universe. Without Living Oceans, planet Earth will no longer have a Life supporting atmosphere. Consider this scenario, and you tell me if i am wrong. 1) we have no way to stop runaway Ocean Acidification. 2) we will probably continue burning fossil fuels worldwide for about 50 more years. 3) all the kings horses and all the kings scuba divers can not prevent the Oceans from becoming so acidic it will dissolve the coral reefs and impair all marine life, including the phytoplankton. 4) when that happens. we could loose up to 70% of Earth's oxygen supply. 5) with more CO2 in the atmosphere, even the trees, plants and crops will no longer function. 6) when the methane hydrates melt. and they already are. mega tons of flammable biomass will burn out of control worldwide. releasing additional greenhouse gas, increasing the positive feedback loop. 7) forests will become deserts. further reducing oxygen and increasing CO2. 8) Earth's currently Livable atmosphere will be lost for thousands of years. No blue, No green. see: <http://ecodelmar.org/sylvia/> ===== . we LIVE on such a beautiful planet. if we could just share the biosphere and stop destroying LIFE for profit . . and so many people are saying. well. humans had their turn on Earth. so now "mother nature" will just take back the planet. and "shake us humans off". like a bunch of fleas. . i don't understand how intelligent humans can have this "attitude". that we "got ours". and we had "our fun" . . and so many scientists that i talk to have this exact attitude. . they say "so what" . let "mother nature" take back the planet. to heck with the future generations. . i say . do you not realize that future generations are as much a part of "mother nature" as you and i are right now. . how can anyone be so egotistically arrogant as to say "so what if humans become extinct". i ask you now if you think LIFE is so worthless for "tomorrow's children". if you HONESTLY think LIFE is really that "worthless". would you bite off even the tip of your own tongue, right now. throw it in the air. and tell God how "worthless" it was for you. and how worthless future generations are to you. . :: "We do not inherit the Earth from our Ancestors, we borrow it from our Children. " . Grand Council Fire of American Indians -----
While this "green" eco-concept may seem obvious to many. when it comes to talking to people who have "religion". as i am facing this issue in my church. the "denial system" is so entrenched it is virtually impossible to have an objective conversation. i could go on and on about this, however, the point is this. most humans will only listen to, and "learn" from, a source their ego esteems. unfortunately for millions of Americans. that is the oil funded pseudo "NEWS" propoganda network. and every one of the viewers is a "voter". while the dominant corporations have more money. "we the people" do have more "votes". and this is exactly why the "corporations" are spreading their slick OIL propoganda to "green wash" as many "voters" as possible. personally, i think we are beyond the tipping point. yet my own human sense of "hope" will not throw in the towel. and perhaps the steps we take today to cut CO2 emissions. will benefit a big step taken by the next generation, that we can not see today. i have found some "green" resources that i can share with my church going friends who will listen. please see: http://ecodelmar.org/Green_Bible/ and <http://ecodelmar.org/sally/> and finally. while this topic may seem frustrating. and it is easy to simply say "the bible belt" is simply blinded by their own dogma. the question is, will we rationally choose to alienate that large population of voters. Help to Save the MBA Lemmings! ~~~~~
http://EcoDelMar.org/MBA_Lemmings ----- . :: " Currently the oxygen content of the Earth's atmosphere dips to 19% over impacted areas, and it is down to 12 to 17% over the

major cities. . . : " At these levels it is difficult for people to get sufficient oxygen to maintain bodily health: it takes a proper intake of oxygen to keep body cells and organs, and the entire immune system, functioning at full efficiency. : <http://www.guardian.co.uk/commentisfree/2008/aug/13/carbonemissions.climatechange> . . . : " Around 10,000 years ago, the planet's forest cover was at least twice what it is today, which means that forests are now emitting only half the amount of oxygen. . . : " Desertification and deforestation are rapidly accelerating this long-term loss of oxygen sources. . . : " The story at sea is much the same. NASA reports that in the north Pacific ocean oxygen-producing phytoplankton concentrations are 40% lower today. <http://ecodelmar.org/phytoplankton> -----
----- Capt Larry Lawhorn <http://EcoDelMar.org> ---

Attachment:

Regional Ecosystem Protection and Restoration

Name

Monty Hawkins

Organization

Which Priority Objective would you like to provide comment on?

Regional Ecosystem Protection and Restoration

Comment

A fisherman 31 years, I am heartened to see this on the NOC's to-do list. I feel certain, however, that a discovery component needs to be added: For over a decade I've been trying to get the attentions of regulators regarding the shallow water corals of the Mid-Atlantic. To truly restore many of our fisheries, there must first be habitat restoration. To protect and restore habitat you must know where it was & what it was composed of. YouTube search "Maryland Corals" for video evidence. Recreational catch estimates are destroying fisheries at a faster pace than foreign factory trawling did: Where MD's tiny fleet of private boats can be held with legally binding certainty to have out-caught the whole coast's tautog party boat effort--There is evidence that routine policy has displaced any sense of discovery, any desire for finding truth. Where habitat fidelity remains unused in fishery management, huge fluctuations in stocks will occur; Where habitat fidelity is factored into quota management and habitats are protected & expanded: Fish Will Flourish. Monty Hawkins

Attachment:

Name

Mark Hughjes

Organization**Which Priority Objective would you like to provide comment on?**

Regional Ecosystem Protection and Restoration

Comment

The scope of the National Ocean Policy and the 9 strategies are too broad and too large to hope to be successful. Select much more narrow scope and size of objectives. All of this needs to have zero impact on net Federal expenses. In other words, if this work costs \$40 billion, then \$40 billion in expenses must be reduced somewhere else in the Federal government. An example would be that NOAA and the EPA both cut their actual expenses by \$20 billion in order to finance \$40 billion for the National Ocean Policy. Recreational needs must be on par with commercial,regulatory or any other interest.

Attachment:

Name

Dr. Bill Lemoine

Organization

drbilllemoineandassociates.com

Which Priority Objective would you like to provide comment on?

Regional Ecosystem Protection and Restoration

Comment

I haven't read everything, but notice no referral or plans regarding aquafer pollution by oil drillers. New techniques for extracting oil involve toxic chemicals seeping into regional drinking water sources. The Ogallala Aquifer is one such multi-state drinking water source. While it's not directly related to NOC's oceans, coasts or Great Lakes, water quality is certainly jeopardized at least from land-based drilling and by extension possibly lakes and oceans. Shouldn't this be addressed by NOC action plans as an important water/land quality topic???

Attachment:

Name

Steve Dubiel

Organization

EarthCorps

Which Priority Objective would you like to provide comment on?

Regional Ecosystem Protection and Restoration

Comment

I am pleased to see support for a Coastal Restoration Corps/Coastal Conservation Corps as part of the Regional Ecosystem Protection and Restoration priority. Developing a Coastal Restoration Corps provides the opportunity to build on the tradition of the Civilian Conservation Corps and AmeriCorps by creating the structure for a program that connects nonprofit conservation corps programs across the United States that have a particular focus on coastal restoration and community/volunteer engagement in coastal restoration efforts. The CRC provides a unique opportunity to address critical coastal restoration issues; raise awareness about these issues in a way that engages communities to take an active role in developing solutions; provide training and career pathways for young people; and create a program model that leverages funding from multiple federal agencies, local government, private funders, and volunteer labor.

Attachment:

Water Quality and Sustainable Practices on Land

Name

Hughes Mark

Organization

Which Priority Objective would you like to provide comment on?

Water Quality and Sustainable Practices on Land

Comment

The scope of the National Ocean Policy and the 9 strategies are too broad and too large to hope to be successful. Select much more narrow scope and size of objectives. All of this needs to have zero impact on net Federal expenses. In other words, if this work costs \$40 billion, then \$40 billion in expenses must be reduced somewhere else in the Federal government. An example would be that NOAA and the EPA both cut their actual expenses by \$20 billion in order to finance \$40 billion for the National Ocean Policy. Recreational needs must be on par with commercial,regulatory or any other interest.

Attachment:

Name

Denyse DuBrucq

Organization

CryoRain Inc.

Which Priority Objective would you like to provide comment on?

Water Quality and Sustainable Practices on Land

Comment

1. When can for profit companies participate in keeping our waters clean? The US EPA GLRI restricted grant applications to the non-profit and government groups. Thus our tool box was excluded. When I finally got a non-profit to work with, they preferred the fixed fire and crises control for power and sewage plants and that proposal was turned down. 2. CryoRain Inc. has many methods to prevent and reduce contamination of our waters - Great Lakes, Oceans, Gulfs, Bays, Rivers entering them, and aquifers emptying into them as well as the sea of air above them. Who, How, and When can we have these tested and approved for use to protect our waters? A partial list includes: Fire control - wildland fires, chemical plant fires, house fires, fire department conversions, oil and gas transport, extraction, pipelines, site safety; clean coal with coal mine fire control, coal mine safety with fixed fire and crises control, and gas stack scrubbers ending smoke release from coal burning facilities and power plants; power plant and sewage plant fixed fire control to prevent Fukushima type catastrophes, spillage, and fire damaging control software and computers; oil spill cleanup on water, sea and shore, end flow from wells out of control, chemical plant emission capture so nothing is released to atmosphere, chemical plant fixed fire control and crises control, toxin release arrest and capture of clouds of gas released, remediation of organic substances in the soil and stream beds, and clean fuel extraction from oil shale, land fill seams and Methane hydrate deposits with no use of water and all fuels, from heating oil to Natural Gas, is extracted, separated and treated on site, safer removal of explosive devices by getting the temperature of the explosive below its ingredient reaction temperatures. Let me remind you, there is not a sea or body of water where for fire control, crises control, clean up and stopping the flow of contaminants into the waters where Freezing is not possible or feasible. It is the most clean and quick way to handle most of the crises. We are losing \$millions in property, saving lives, damage to Federal property and killing our seas by not testing and applying the Liquid Nitrogen sourced Nitrogen gas technology provided by CryoRain Inc. We are ready, willing and able to work with any agency in doing this testing. Patent USP 7,631,506 allows the raining of Liquid Nitrogen as air drops, land releases for displacing Oxygen and for cooling things rapidly and underground releases for embedded fire control as coal mine fires, tire fires, landfill fires, and in tar sands areas, natural fuel burns. There are 15. 5 years left in these patent rights. How many jobs will using this discovery create? I plan on hiring 2,000 people for the various teams and training assignments.

Attachment:

Attachment included in index: Comment of Denyse DuBucq EdD, Thermist, Inventor, Managing General Partner, AirWars Defense Ip, CEO -- CryoRain Inc. (5 pages)

Name

Andrew Prince

Organization

Which Priority Objective would you like to provide comment on?

Water Quality and Sustainable Practices on Land

Comment

Let's stop with all the drilling for oil in every body of water that the United States has stake in. If other countries want to do it, then let them kill their own ecosystems. We have ours and we should preserve and treasure it for future generations. We also need to address overfishing. We need fish, we enjoy eating fish. It must be done in a responsible matter though. If you can't fish in a responsible sustainable matter then you need to get out of the business. Maybe the government can give subsidies to fish farmers instead of oil companies.

Attachment:

Changing Conditions in the Arctic

Name

Philip Ratchiff

Organization

Which Priority Objective would you like to provide comment on?

Changing Conditions in the Arctic

Comment

Drilling for oil around Alaska, such as in the Chukchi sea, should not happen. Period. A spill there, or an underwater blowout, such as in the Gulf of Mexico, would be far worse than in the Gulf of Mexico. If it happened in the winter, and the sea was icy, no response could occur until the ice melted. Unlike the Gulf, no response ships are located near the Arctic. --- As a Californian, I feel strongly that a permanent moratorium should be enacted, on drilling off of our coast. Every California Democratic politician feels the same way. Or, if drilling must occur, keep it to the existing wells off Southern California's coast. No new wells! No new wells have been drilled off California's coast in 40 years. --- Some states welcome oil drilling off of their coasts. Fine. California is not one of them. Let's have a moratorium on Pacific Coast drilling. Thank you.

Attachment:

Name

Judith Miller

Organization

Brendan Environmental

Which Priority Objective would you like to provide comment on?

Changing Conditions in the Arctic

Comment

Thank you for coming to Alaska to take comments. I spoke briefly at your Anchorage meeting, and would like to follow up by submitting the attached proposal for a public/private partnership towards oil spill response capability in the Arctic.

Attachment:

Attachment included in index: Comment of Judy Miller, Brendan Environmental, Anchorage, Alaska (7 pages)

Name

Mark Hughes

Organization**Which Priority Objective would you like to provide comment on?**

Changing Conditions in the Arctic

Comment

The scope of the National Ocean Policy and the 9 strategies are too broad and too large to hope to be successful. Select much more narrow scope and size of objectives. All of this needs to have zero impact on net Federal expenses. In other words, if this work costs \$40 billion, then \$40 billion in expenses must be reduced somewhere else in the Federal government. An example would be that NOAA and the EPA both cut their actual expenses by \$20 billion in order to finance \$40 billion for the National Ocean Policy. Recreational needs must be on par with commercial, regulatory or any other interest.

Attachment:

Ocean, Coastal, and Great Lakes Observations, Mapping, and Infrastructure

Name

Mark Hughes

Organization

Which Priority Objective would you like to provide comment on?

Ocean, Coastal, and Great Lakes Observations, Mapping, and Infrastructure

Comment

The scope of the National Ocean Policy and the 9 strategies are too broad and too large to hope to be successful. Select much more narrow scope and size of objectives. All of this needs to have zero impact on net Federal expenses. In other words, if this work costs \$40 billion, then \$40 billion in expenses must be reduced somewhere else in the Federal government. An example would be that NOAA and the EPA both cut their actual expenses by \$20 billion in order to finance \$40 billion for the National Ocean Policy. Recreational needs must be on par with commercial, regulatory or any other interest.

Attachment:

Name

HienVien Phan

Organization

Retired Social Worker

Which Priority Objective would you like to provide comment on?

Ocean, Coastal, and Great Lakes Observations, Mapping, and Infrastructure

Comment

President Obama has an enlightened vision about the importance of Ocean, coastal and great lakes. We need a policy about Air space, Land and Sea way for our defense.

Attachment:

Index: Attachments to Comments

Water Quality and Sustainable Practices on Land

Comment of Denyse DuBucq EdD, Thermist, Inventor,
Managing General Partner, AirWars Defense Ip, CEO,
CryoRain Inc.

(5 pages)

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A New Technology Births a New Science - Thermistry

With seven years experience and now an issued patent, USP 7,631,506, on the discovery that Liquid Nitrogen, when rained through a perforated pan or trough produces pure, inert, cryogenically cold Nitrogen gas which opens a world of capabilities from ending fires and crises to extracting fuel and polluting compounds from the earth. It is; Green, mean and clean since Nitrogen is already 78% of the atmosphere, it not only is available everywhere and mixes back in with no mess, no damage, no change. A fire burning flooded with pure Nitrogen just isn't burning any more.

The new science, Thermistry, is the study of or related to using temperature difference to drive change or motion using an inert material - here Nitrogen, N₂, molecules – the fourth coldest liquid in the world - creating action without chemical reaction. Chemical reaction is prevented both by having reactive materials surrounded by inert Nitrogen gas which eliminates the reactive Oxygen and even Hydrogen from interacting, and, second, by taking the ambient temperature of the materials below their temperature window of reaction.

Thermical events include atmospheric weather and all its ramifications, hot air heating, and air conditioning. All these deal with the 78% Nitrogen air mass, and, until lightning occurs it avoids other sciences - even to include clouds and tornados, hurricane systems, and hail storms.

Thermical techniques start cryogenically using Liquid Nitrogen rained through a spaced-hole sieve descend in drops through warmer air causing the drops to evaporate into pure Nitrogen gas. Nitrogen's wrapped-tight molecule prefers to neighbor itself and in the evaporation process will force other air components out of the cloud of Nitrogen giving pure Nitrogen gas, an inert gas cloud at cryogenic temperature. On evaporating the Liquid Nitrogen drops in a calm environment, one can see the size of the pure gas cloud because its rim is clouded with condensed water vapor. A burning match placed in the clear air stops burning.

Factors included in Thermistry using Liquid Nitrogen sourced Nitrogen gas:

1. transferring temperature. It will cool things down rapidly, passing the cryogenic Nitrogen gas through pipes, it freeze things. It also will solidify spilled liquids for easy pick up and even gaseous toxins keeping them in the canister or aerosol they are in preventing their dissemination. Used in oil shale extraction, the cold will crack the kerogen that contains the fuel components. Working with unexploded ordnance, the freezing will prevent able power function and then at lower temperature, prevent the chemical reaction that causes the explosion. In controlling coal mine fires, it counters the inferno in the surface burns and rapidly reduces the

underground temperature that would re-ignite methane gas and coal burning. To cool the last Chinese coal mine fire, it took three years

2. enabling Oxygen-free transport of flammable materials as fuels and reactive mixtures. Extracting fuel with Nitrogen as the carrier of the fuel to the surface, one can reach the needed 375°C. temperature to carry all the heating oil and nothing will burn. It is offered to cool down the Fukushima Nuclear facility fuel rods to prevent meltdown. They report temperatures of 322°C in the reactors and spent fuel rod storage, but that is below our heating oil extraction temperature and way above water boiling so as to insure a dry environment which brings danger of Oxidizing the fuel rod chemicals.
3. ending fuel fires by bathing the burn in Nitrogen gas evaporated from Liquid Nitrogen relates to energy safety from coal mines and petroleum facilities to chemical plants and even particle fires as lint, dust in silos and shipboard with grain shipments, sugar production and the like.
4. freezing the containment of fuels as in oil shale and landfill seams where stored water freezes expanding its 10% microscopically fracturing the material containing the fuel components which allows release of contained fuels upon heating later in the process. In the fuel extraction, the locked in fuels in sedimentary situations is opened by the expanding water in the materials. With oil shale it let heating the rock after Liquid Nitrogen / cryogenic Nitrogen treating give off light, sweet fuels and water and then, as the heating continued, the gasoline, kerosene and heating oil. Without the Nitrogen treatment, it gave off sulfur compounds.
5. saturating the ground, the Nitrogen eliminates the Oxygen so high temperature extraction can be done without ignition of the fuel bringing even Methane safely to the surface and capturing it by condensation, and providing means to end subterranean coal mine, peat and other embedded fires. This again is for fuel extraction and coal mine fire control as well as other embedded fires that burn long now since, other than this new Nitrogen technology, there is no means to end them.
6. carrying particles and molecules emerging from fires and other releases sometimes around the world - pumice from St. Helen's volcano in Washington state dropped on my car in Boulder, Colorado to the depth of about 1/16th of an inch. Smoke from a wild land fire 125 miles away and 5,000 feet higher than my position closing I-76 because the smoke produced a blinding cloud of smoke. The 78% Nitrogen atmosphere does this.
7. penetrating the ground with Nitrogen gas in the pure state to control embedded fires stop the smoke and toxin releases by cooling the ground to below ignition temperature, and as mentioned in #5, suffocates the burn.

8. flooding the fire draft with Nitrogen, a gaseous fire suppressant, see NFPA Code 2001, ends the burning and counters infernos which pull the Nitrogen cloud into the fire going to whatever level of the structure or of forest the most active burn is happening. The fire brings the fire suppressant to itself ending the burn. In contrast, water and foams drop fall through the fire, and puddle on the ground. Extending this further, when a cloud of Nitrogen is drawn into a fire, it can be pulled into and be effective in ending a series of fires because it stays as a gas and has no chemical change. If it does mix in the fire it is flooded with Carbon dioxide which, as you know, is also a fire extinguishing agent.
9. using the cryogenic temperature of just evaporated Nitrogen in condensing tubes in a coal smoke environment freezes out the water on the walls of the tubes causing soot to drop out of the air. Further cooling can condense Carbon dioxide (CO₂), into dry ice, or like the Dutch practice, pass CO₂ through greenhouses to enhance plant growth. This gas stack scrubber method eliminates the smoke rather than disseminating it into the air off the top of a tall chimney and applies the smoke components to enhancing plant growth.
10. breathing pure Nitrogen or Argon, Neon or Helium air by man or beast causes fainting, because the level of CO₂ in the lungs ends with no Oxygen exchange. The diaphragm action stops and the brain sleeps inducing fainting. In this state, fires and their smoke do not damage or destroy the lungs of those caught in a fire and, if resuscitated within six minutes, they will survive without mental or physical damage. Also flooding a Methamphetamine Lab situation both controls the occupants and prevents explosions making it safer for first responders. First responders with extra SCUBA equipment must be in the fire area to quickly restrain suspects and resuscitate anyone caught in the fire and walk them out. The non-lethal weapon use also ends hostage situations and robbery attempt at banks or convenience stores or airliner hijackers.
11. realizing this Nitrogen gas is invisible to the eye, unidentifiable to the nose, not tasted by the tongue and silent to the ear – knowledge of its effects and actions to remedy a situation will protect the population in the environment of its use. Using this Nitrogen gas sourced from Liquid Nitrogen was suggested to the US military as a favored means to do urban warfare in Iraq in that both persons and property are protected and undamaged, yet the terrorists can be easily separated and interrogated. They say money is the issue and then choose the most expensive means – drone bombs which are costly as is recovery from the explosion to say nothing of unnecessarily lost lives.
12. fighting fires with Nitrogen leaves no water damage and no electrical arcing making this technology optimal for handling vehicle fires with the ever increasing number of electric and hybrid automobiles on the road mixing with the fossil fuel powered vehicles. It leaves homes which have had fires more quickly recoverable since only what burned away,

- warped, melted, or was scorched needs replacing. It still smells so bring on the Fabreeze TM.
13. winter fire fighting using Nitrogen does not cause ice build up as using water does, damaging the structure and coating the ground with ice endangering those walking, working and driving in the area.
 14. measuring Nitrogen gas volume from one gallon of Liquid Nitrogen, one gets 230 gallons super cold (30.7 cubic feet) – the volume of a twin bed with mattress; at room temperature, 250 gallons (33.4 cubic feet); and at inferno temperatures, over 600 gallons (80+ cubic feet). A truckload of 3,000 gallons of Liquid Nitrogen floods 92,240 cubic feet with super cold and 100,260 cubic feet with room temperature Nitrogen. It is not consumed in the fire so can end burns over a large tract. When having heated in countering inferno temperatures, it will rise in the atmosphere flooding 240,000 cubic feet of treetop infernos. With a sheering 5 MPH wind, it becomes part of the atmospheric gases being normally 78% Nitrogen. Once polluted considerably, it mixes easily with the air.
 15. determining Nitrogen molecular reactivity with its diatomic structure, it shares three electrons putting its reactivity between Oxygen (O₂) and diamond structure of Carbon (C₄). It takes legumes – peas, peanuts, beans of all sorts - to split the Nitrogen atom pairs with their rhizome bacteria. These bacteria create nodules on the roots which when left in the field will fertilize the ground for several years of growing other crops.
 16. preventing flooding by freezing water and gravel in sandbagging and levees and freezing temporary patches in dams and dikes. This was offered to protect the just rebuilt New Orleans against Category #5 hurricane flooding and river flooding using sandbagging for towns threatened in general river flooding. The patches were offered to stop the flow of radioactive water from the Fukushima Nuclear Facility.
 17. reducing pollution, nuclear or toxic, by freezing out the water containing the irritant and transporting it to a place safe to dispose or degrade it. Here again was a solution to a Fukushima difficulty where radioactive water was gushing from a reactor flooded to cool it.

These seventeen factors alone can influence our decisions on fire and crises handling, wild land and coal mine fire control, remediation of organics from the soil and ground to prevent further contamination of aquifers, implement fuel extraction from fossil fuel deposits of all but solid carbon materials - diamond, slate, and anthracite coal, and freezing levee cores, sandbagging and breach repair to prevent flooding. Many problems cannot be handled by current technology except for this cryogenic means and others are poorly or expensively handled, either economically or environmentally as the dispersing detergent to counter the BP Oil Crisis in the Gulf. Using this technology, CryoRain offered to end the flow of crude from the wellstem which would have cut the polluting of the Gulf of Mexico by two months, but someone put as the first reason to reject a

proposal that “Freezing is not Feasible.” Our triple pack offer there was to end the flow from the well, freeze the crude on the surface of the water and freeze the crude on the shores and take collected crude to area refineries to convert to fuel. Chefs on television of late have been pouring Liquid Nitrogen into their mix for the best ice creams....no after taste in Nitrogen. Having Nitrogen in the kitchen can end a kitchen fire is a flash and not destroy the meal(s) in preparation.

Enjoy discovery of applications remembering I have a eight year advantage and an array of patents pending and proposals implementing those I found useful. If the administering scientists in our crises centers would have the courage of great chefs, this technology would have been in the field years ago. Let us work together to get this logical choice for countering fires and crises into use from fire departments to fixed systems like replacing water sprinkler systems to the non-damaging Liquid Nitrogen sourced Nitrogen gas which do not expand the damage beyond that caused by the fire and ending the fire more quickly even reduces the damage the fire might have caused if fought with water, foams or chemicals. Communities should convert their crises fighting to our most abundant gas and save money, property, and, most importantly, lives.

Sincerely,

Denyse DuBrucq EdD,
Thermist, Inventor,
Managing General Partner
AirWars Defense Ip
CEO - CryoRain Inc.

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Index: Attachments to Comments

Changing Conditions in the Arctic:

Comment of Judy Miller, Brendan Environmental,
Anchorage, Alaska

(7 pages)

**An Alternative Compliance
Concept for Oil Spill Protection in Alaska
and the Changing Arctic:
The Alaska Response Company**

June 2011

**Prepared by:
Judy Miller – Brendan Environmental**

**5555 Chilkoot Ct. #1
Anchorage, Alaska 99504**

EXECUTIVE SUMMARY

1.0 THE CONCEPT FOR AK Response Company (ARC)

As the Arctic melts, and vessel traffic increases, concern grows for protection of Alaska's waters and marine resources. The non-profit cooperative, Alaska Response Company (ARC), is proposed to address a serious oil spill prevention and response gap in Alaska. Both industry and the federal government are searching for critical spill protection services for marine traffic in the Aleutian Islands on the North Pacific Great Circle Route. New federal regulations will soon dramatically increase the number and type of vessels that must fulfill oil spill contingency (C-plan) requirements. The U.S. Coast Guard (USCG) awaits a comprehensive proposal brought forth under the federal Alternative Compliance rule. A response structure initiated for the Aleutians could be expanded to cover the Bering Sea and beyond.

ARC could offer oil spill prevention and response coverage for the thousands of vessels transiting through the Aleutians. These vessels could stay on-route by contracting with ARC for prevention and response services under a federally-approved Alternative Compliance C-plan. ARC would collect a fee for each covered vessel to support the cost of this service.

2.0 INTRODUCTION

Expanded OPA 90 oil spill response regulations are coming into effect for maritime operations in U.S. waters. These regulations will have a significant impact on vessel traffic through the Aleutian Islands. The Oil Pollution Act of 1990 (OPA 90) currently affects all tankers and will soon include large (over 400 gross tons) non-tank vessels (NTV) as well. Operators of NTVs travelling the North Pacific Great Circle Route must come into compliance with new C-Plan requirements.

The change in regulation will increase by thousands the number of vessels required to secure contracts with an Oil Spill Removal Organization (OSRO). There is currently very limited OSRO capability in the Aleutians. The USCG is mandated to approve oil spill C-plans with contracted OSROs before allowing most major vessel traffic to continue on this route. The lack of prevention and response capability in the area effectively means there is no way to meet the requirements, forcing vessels to either travel in non-compliance, or outside of the preferred route. Route deviation will increase operator costs and time.

The USCG is waiting for a provider to offer oil spill response and tug services in the Aleutians which they can endorse. The vacuum of services that currently exists creates a risk for Alaskans and Alaskan waters from those vessels which do not have any C-plan coverage. (Some fall under state requirements, and have limited coverage.) A proposal needs to be crafted.

The availability of Shell's Exploration and Production (SEPCO's) Oil Spill Response Vessel (OSRV) *Nanuq* during SEPCO's offseason presents one possible opportunity for coverage in the Aleutians. By offering services using an Alternative Compliance proposal, utilizing the OSRV *Nanuq* or other vessel, ARC will support the USCG to meet their enforcement mandate, develop a safer operating environment for thousands of vessels, and will add immensely to resource protection in the Aleutian Islands, and in overall Alaska response readiness. It may even be possible for the USCG to partner and use the vessel for their missions.

3.0 CURRENT SITUATION/PROBLEM STATEMENT

The Aleutian Islands sit on the North Pacific Great Circle Route between North America and Eastern Asia. Though very heavily trafficked, there is limited oil spill response capability available in the area. The USCG is mandated to enforce current tanker and soon, additional non-tank vessel, oil spill response readiness requirements.

Recent USCG interpretation has changed what historically had been considered “Innocent Passage” along this route for many vessels. Now, vessels traveling to or from a U.S. port must comply with OPA 90 while in US Waters (within 200 miles of shoreline). Another interpretation assumes vessels coming within 12 miles (the Territorial Sea) are compelled to comply. Regardless of which distance measure is utilized, vessels transiting Unimak Pass in the Aleutian Islands must pass closer than 12 miles to land, so must comply.

Tankers must have a contracted Oil Spill Removal Organization (OSRO) and a Geographic Specific Appendix in an Oil Spill Contingency Plan (C-Plan) for this area. Lacking adequate spill response infrastructure, many tanker transits have completely avoided the Aleutians, choosing to deviate south. The north Pacific in winter can be a very dangerous transit outside of the protection offered by the Aleutian Islands. Recent proposed rulemaking will now require the same level of compliance for non-tank vessels, increasing the pool of affected vessels by thousands. Traffic into the Bering Sea also continues to grow. The increased numbers of vessels requiring coverage presents an opportunity on an economy of scale unavailable before.

Regulations with wider applicability are coming on line. There is increased urgency for a service provider organization to offer coverage for the Aleutians. A cohesive group does not exist to band together and offer a proposal. A disparate, unorganized, unrelated group of vessel owners and operators run the many non-tank vessels transiting the Aleutians. These vessel owners/operators need a provider to offer credible coverage with which they can contract. The USCG is hoping “industry” will come forth with a plan and have convened a working group to that end. So far, only the status quo of minimal coverage has been offered through this effort.

In the Aleutians, the primary threat of a spill comes from a vessel going adrift, usually due to loss of power or propulsion and breaking up on the rocks. The *Nanuq* offers both prevention capability to keep a vessel off the rocks and response capability with her equipment. A proposal involving the *Nanuq* will support the USCG’s mandate to enforce regulation while offering credible coverage for vessels who sign on for ARC coverage in the Aleutians.

The USCG itself is also sorely lacking in Arctic infrastructure and presence. In addition to needing an OSRO provider, the USCG themselves need to increase their Arctic mission capabilities. A win-win solution could be crafted with a partnership. Costs for maritime industry oil spill standby readiness could be shared while meeting USCG vessel needs.

4.0 OSRV NANUQ

The OSRV *Nanuq* (Figure 1) offers far more value than the oil spill cleanup component of her services alone. *Nanuq*, built, owned and operated by Edison Chouest Offshore on contract to Shell, has open water response capability with Trans Rec Skimmers and associated cleanup gear, but also offers substantial towing capability (see Figure 2) with 90 metric tons of bollard pull. By incorporating the *Nanuq* in an Alternative Compliance proposal, an ARC OSRO could offer large vessel towing services. The *Nanuq* can connect with a vessel-in-distress and keep it from breaking up on the rocks.



Figure 1
OSRV *Nanuq*

5.0

OSRV *NANUQ* Specifications

- Anchor Handler with towing capabilities, 250-ton winch
- Bollard Pull 90 metric tons
- Oil Spill Response ready with 12,000 bbl recovery capacity
- USCG Certificate of Inspection for 41 people
- Dynamic Positioning Class 2
- Can be globally dispatched with 13,000 nautical mile range
- EPA-compliant catalytic diesel particulate filters (CDPF) (offer 80 % reduction in Black Carbon emissions); utilizes ultra-low sulfur diesel (ULSD)
- Underway in less than 30 minutes from the dock
- Internet 256/256 with IP phone lines and data transfer
- Fire fighting equipped
- Equipped with a 15-ton and 5-ton deck crane
- Equipped with the latest oil spill response equipment

Figure 2 *Nanuq* Towing Capability includes large structures such as oil rigs



6.0 OSRV NANUQ AVAILABILITY

The *Nanuq* is available during the November through May timeframe according to the Shell Exploration and Production (SEPCO) Operations and Planning Manager – Alaska Venture. They have stated Shell would like to see this purpose-built, ice-hardened, arctic-class oil spill response vessel employed in Alaska during the off-season. As a result, ARC proposes to position the *Nanuq* in the Aleutians during this off-season window, which also coincides with the rough winter weather period in the North Pacific. Alaska is where the *Nanuq* can be best utilized and contracting the vessel for prevention and response in the Aleutians, could make economic sense.

7.0 ALTERNATIVE COMPLIANCE

Under OPA 90, full contingency plan compliance requires significant prepositioned oil spill response personnel and resources, (approximately every 200 miles) and a plan to cascade-in additional people and resources in tight timeframes when a spill occurs. Major oil companies banded together to form a non-profit co-op Outside, (in the Lower 48 states), the Marine Spill Response Corporation, for their tankers and facilities to meet OPA 90 requirements when the initial legislation was enacted. This didn't include Alaska. (See Appendix A for further discussion in full version of the proposal).

Providing full compliance along the Aleutians has always been impractical because of the vast distances, limited infrastructure, harsh climate, remoteness, winter weather, and other challenges. Vessels must comply, but the cost of full compliance to the letter-of-the-law under OPA 90 is prohibitive. "Alternative Planning Criteria" were called out in regulation for exactly this type of situation. An alternative compliance proposal would give the USCG an appropriate plan to approve. That plan can offer coverage protecting the environment as the regulations envisioned, but in a proposal expressly suited to the situation in the Aleutians. The ARC Alternative Planning proposal, based on utilization of the *Nanuq*, will heavily emphasize a protection and prevention strategy along with robust response capability.

8.0 ALEUTIAN ISLANDS VESSEL TRAFFIC ON THE NORTHERN GREAT CIRCLE ROUTE

A great circle is the shortest distance between two points on a sphere. The North Pacific Great Circle Route brings international vessel traffic transiting between the U.S. and the near east through Unimak Pass and again farther out west on the Aleutian Island chain.

Future Vessel Traffic Pressures

Vessel traffic volume is likely to continue growing in the Arctic. With the potential for further receding ice and the opening of the Northwest Passage, increased traffic in the Aleutians is inevitable as this passage offers dramatically shorter routes for certain transits. Vessel traffic passing through the Bering Straits generally must cross the Aleutians if bound to or originating from any point outside of Western Alaska.

In addition to being the shortest distance, the Great Circle Route through the Aleutians offers weather protection greater than the open northern Pacific Ocean for traffic on this North America to East Asia route. There is inherent risk in traveling through Unimak Pass, as proximity to shore puts vessels somewhat at danger, but apparently the advantages outweigh the risk.



9.0 TOTAL FLEET FUEL SAVINGS

There is a cost involved in deviating from the preferred Northern Great Circle Route. An Alternative Compliance C-Plan can offer fuel savings to vessel operators.

What is the value of saved fuel on this shortest route? A quick calculation concludes at least \$23 – \$44 million for containership and bulker transits on the Northern Great Circle Route appears to be on the table. Stated differently, millions of dollars in bunkers savings is available annually to support contracted oil spill prevention and response services. Availability of those services will allow vessels to meet compliance requirements, save on fuel, reduce CO2 emissions, and stay on the safer route. (Analysis including numbers of affected vessels and fuel volumes is available in the full version of this proposal.)

10.0 Conclusion

An Alternative Compliance solution in the Aleutian Islands will allow the Coast Guard to enforce regulations, and protect Alaskan waters. The ideal tool, the OSRV *Nanuq*, is available during Shell's off season. No potential provider has come forth with a proposal. Brendan Environmental brings a keen understanding of federal, state, and regional regulation and requirements and a commitment to coordinate closely with industry and the USCG to develop a plan in an expeditious manner.

At the same time an ARC OSRO proposal will be assisting the USCG with pending regulations and the shippers who are sailing the Great Circle Route; it will also assist Shell in utilizing the *Nanuq* in the off-season, in Alaskan waters, which is their desire. The USCG could share both the burden and benefits by partnering to support this capability. This proposal fulfills many existing needs, while also giving Alaska the opportunity to grow response capability and jobs.

11.0 RECOMMENDATION

Brendan Environmental would like to continue investigating the costs and design the administrative structure necessary to offer the proposed Alternative Planning solution. Previous conversations with the USCG indicate their support of pursuing this concept. Implementation funding through Phase B of the Aleutian Islands Risk Assessment is being sought for the project. Attempts to meet with the Northern Waters Task Force are underway. The approval and support of Alaska's state government and Congressional delegation is requested.