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Comments on Preliminary Strategic Plan for the California Coastal Ocean Observing System (CalCOOS)

On behalf of the Southern California Coastal Ocean Observing System (SCCOOS), we are submitting these comments in response to the California Ocean Protection Council's *Preliminary Strategic Plan for the California Ocean Observing System*. We thank you for the opportunity to submit these comments, and commend you and your staff for the quality of the report. We believe that the goals of CalCOOS—to connect the myriad of statewide entities and needs with marine science and observations—are necessary.

SCCOOS Background

This letter represents a consensus position of senior personnel from the 11 different organizations responsible for the development and operation of an integrated coastal observing system in Southern California. SCCOOS is one of the two federally recognized regional associations (RAs) within the state that is supported by federal, private, and state funding to gather, manage, and interpret data to aid decision making. To ensure statewide interoperability with the other system in development in Central and Northern California (CeNCOOS), these organizations drafted and signed an MOU in February 2004 to establish the *Federation of California Regional Observing Systems*. A copy of this MOU can be found at the following weblink: http://www.sccoos.org/docs/SCCOOSCenCOOS.pdf.

We would like the Council to note that SCCOOS is not only a Regional Association (RA), but is also a regional coastal ocean observing system (RCOOS); we receive federal funding from the NOAA's Coastal Ocean Technology System (COTs), and leverage SCCOOS systems for funding from the National Science Foundation, Office of Naval Research, and Army Corp of Engineers, among other agencies. While we would welcome CalCOOS support in assisting NOAA and other federal agencies in their relationships with California observing systems, we believe that each OOS must work directly with NOAA, for example, in the grant process. To increase the overhead to NOAA would be detrimental to all.

Naming and Branding of CalCOOS

We are concerned, however, with the choice of "CalCOOS" as the name of this new organization. Because both existing regional observing systems in California, SCCOOS and CeNCOOS, have achieved high levels of recognition at state and

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federal levels, as well as with end users, adding "CalCOOS" to the already existing named ocean observing systems may produce confusion with potential customers, as well as with federal planning efforts. The "OOS" acronym is a marker to the ocean observing community of an existing and/or planned infrastructure; "CalCOOS," as a name for an organization that will not include observing infrastructure may dilute the effectiveness of the "OOS" acronym for those already in existence. However, we feel that a name which implies a California-wide ocean observing entity would be positive, and would like to suggest that the Council consider alternate names that convey such a function without using the "OOS" acronym. In addition to the nearshore observatories that principally are designed to address state and local management issues, NOAA, academic partners, foundations, state fisheries agencies, and other organizations are developing an integrated Pacific Coast Ocean Observing System (PaCOOS) for the California Current large marine ecosystem that extends from Mexico to Canada.

A Role for a Statewide Coordinating Entity

We agree that CalCOOS could provide a mechanism for coordinating users, identifying and clarifying how they could benefit from ocean observations, and helping users to define priorities among the different observing strategies. CalCOOS could also serve as a primary (or perhaps sole) advisory body to observers like the RAs, and as a primary way to provide federal agencies with a report on the responsiveness of the RAs to user needs. CalCOOS could achieve economies of scale in coordinating users, ensure that overarching needs are given priority, and ease the political problems the RAs face in trying to devise a user-responsive governance system while working on the technical problems of implementing effective and efficient observing systems. How this is implemented will need to be closely coordinated with the existing outreach and product development efforts already underway by SCCOOS and CenCOOS to prevent confusion.

We feel that CalCOOS could be very helpful in linking users with observing system operators and in encouraging development of useful products, but would want to carefully explore any proposed oversight of this process. From our experience as an operational coastal ocean observing system, we have learned that science is needed to a) determine what observations are needed and b), to implement these observations, and c) to translate those observations into useful products. We have found this to be an iterative process, and that connecting with end-users and developing products must be included in our business plan, including budgeting at the state and federal levels, as well as when seeking other sources of funding. Separation of product development from observing system operations may lead to disconnect, inefficiencies, redundancy, and slow communication of technical developments, and we recommend instead a vertically integrated approach that uses the existing regional observing systems for operations, data management, and operational product development. A new statewide entity could identify observing system needs and markets within state agencies, communicate needs to the observing system developers, facilitate the flow of communication and encourage use of new decision making tools by state managers, and establish statewide priorities for ocean information. SCCOOS and CeNCOOS are already working with local, state, and federal consumers of the data that have missions within state waters. For more information on SCCOOS outreach, see the enclosed 2004-05 annual report to NOAA. A recent year-end review of the SCC sponsored Coastal Ocean Currents Monitoring Program (COCMP) also included a number of products under development for ocean data users.

We have found that there are problems with RA activities being shaped primarily by local users; there are too many users to directly influence the objectives and strategies of the RA observations through any manageable and effective governance structure, and there are many practical problems like search and rescue, oceanic fisheries, and the ecological impact of climate variability that require an overarching organizing structure which will not be achieved with a "sum of locales" approach.

CalCOOS Organization Structure

We recommend that the entity created be within a state agency and not a 501c(3) not-for-profit. We feel that creating another non-profit organization may weaken the impact of the new entity, both within the state and at the federal level. We feel that most efficient structure would be one that is internal to the State Coastal Conservancy Ocean Program, and that functions that cannot be met by internal staffing should be out-sourced to pre-existing organizations; *i.e.*, California does not need redundancy. If this new entity is to engage the appropriate state agencies and managers, we feel that a 501c(3) organization will not have the appropriate authority—especially with staff within mission agencies—to develop a meaningful dialog with future consumers of the data and products from the observing systems in California.

CalCOOS Funding Model

We also request clarification be provided regarding the new entity's role as a funding source; would it distribute state funds, or expect federal funds to flow through it to the RA's? As mentioned above, we are concerned that the latter case would complicate federal funding, and increase overall costs (due to additional overhead). We also ask that the COPC request a funding model for CalCOOS in order to clarify how its existence might impact SCCOOS and CeNCOOS in seeking funding from state, federal and private agencies.

Omission of the Coastal Data Information Project

We recommend that the final report include the Coastal Data Information Project (CDIP) in both the "what are observing systems" and "how are they useful" sections of the report. CDIP, like the California Cooperative Oceanic Fisheries Investigation (CalCOFI), is a collaborative effort between state, federal, and academic organizations. (http://cdip.ucsd.edu/)

Closing

We have noted a few minor technical errors in the science used in the CalCOOS document, and would be happy to review the final document for scientific accuracy.

We encourage and support the creation of this new entity, and appreciate the efforts of the COPC on behalf of California's coastal oceans.

Thank you for your consideration.

Sincerely,

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Attachment: NOAA Organization Report 2004-2005