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February 12, 2010

Chair, Interagency Ocean Policy Task Force
White House Council on Environmental Quality
722 Jackson Place
Washington, DC 20503

**Re: Interagency Ocean Policy Task Force;
Interim Framework for Effective Coastal and Marine Spatial Planning**

Dear Sir or Madam:

I am writing on behalf of the American Veterinary Medical Association (AVMA), established in 1863 and the largest veterinary medical association in the world. As a not-for-profit association established to advance the science and art of veterinary medicine, AVMA is the recognized national voice for the veterinary profession. The association's more than 80,000 members comprise approximately 84% of U.S. veterinarians, all of whom are involved in myriad areas of veterinary medical practice including private, corporate, academic, industrial, governmental, military, and public health services.

The AVMA appreciates the opportunity to offer comments on the proposed **Interim Framework for Effective Coastal and Marine Spatial Planning**. Recognizing competing interests in the ocean, our coasts and the Great Lakes and offering a comprehensive, integrated approach to planning and managing uses and activities in our waters is an important step forward. We recognize that the Interagency Ocean Policy Task Force seeks to outline approaches to coastal and marine spatial planning that would be regional in scope and developed cooperatively among Federal, State, Tribal and local authorities, and with substantial stakeholder and public input.

We appreciate that the approach desired is to move the U.S. from a sector-by-sector and statute-by-statute approach to decision-making that will utilize sound science for decision-making in determining effective spatial planning. The AVMA believes it is important to utilize a sound-science approach, with strong input from scientific and technical experts, to determine a rational, justified and balanced utilization of all resources rather than resource allocation using a "precautionary approach" based on partial or biased information.

Under the 'One Health Initiative' the veterinary profession deals directly and indirectly with animal, human and environmental health. As the voice of the U.S. veterinary profession the AVMA constitutes a major stakeholder and should be intimately involved in all aspects of public policy and effective coastal and marine special planning. Veterinary expertise in health and welfare of all animals (including aquatic farmed, domesticated and wild species), as well as in public health and seafood safety, will be invaluable in ensuring an adequate and well-balanced Oceans Policy.

Most importantly, the AVMA believes that the veterinary profession should serve as scientific and technical experts on aquaculture and harvest fisheries management plans that

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involve animal and public health, and seafood safety, and should be consulted when policies and regulations are formulated and promulgated. Policies and regulations that evolve within Federal and State regulatory agencies that have overlapping responsibilities in these areas are of paramount importance to the AVMA, including: the Department of Interior, U.S Fish and Wildlife Service; the Department of Commerce, National Marine Fisheries Service; and the United States Department of Agriculture, Animal and Plant Health Inspection Service.

Most notably, as aquatic animal disease is now recognized as impacting harvest and farmed fisheries, we believe it is imperative that these agencies, the State and Tribal counterparts, the non-governmental organizations representing commercial harvest fisheries and aquaculture, and the veterinary profession work together to develop policies and programs that involve coastal and marine spatial planning. We believe this is key to developing a more integrated, comprehensive, ecosystem-based, flexible, and proactive approach to planning and managing uses and activities for coastal and marine spatial planning.

Thank you for the opportunity to provide initial input on this important matter and we look forward to developing initiatives under a national policy for the oceans, our coasts and the Great Lakes. Should you have additional questions please feel free to contact me or Dr. David Scarfe (dscarfe@avma.org; 847-285-6634).

Most sincerely,



W. Ron DeHaven DVM, MBA
Executive Vice President, CEO

WRD/ADS