

NORTHEAST REGIONAL OCEAN PLANNING:
PUBLIC COMMENTS ON
DRAFT OCEAN PLANNING GOALS
(ONLINE, MAIL, EMAIL)

MAY—JULY, 2013

September 6, 2013

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American Sportfishing Association

Association to Preserve Cape Cod

Atlantic Offshore Lobstermen's Association

Connecticut SeaGrant

Conservation Law Foundation

Dr. Damon E. Cummings

Fisheries Survival Fund

City of Gloucester

City of Gloucester

Dawn Hellier—May 29

Dawn Hellier—June 5

Dawn Hellier—July 8

The Island Institute

Islesboro Island Trust

Professor Heather Leslie, Karen Cortes, and Megan Palmer, Brown University

Maine Coast Fishermen's Association

National Ocean Policy Coalition

Natural Resources Defense Council

The Nature Conservancy

Valerie I. Nelson

New England Fisheries Management Council

New England Ocean Action Network

Northwest Atlantic Marine Alliance

Ann Pembroke

M. Sunny Robinson

Ken Ross

The Sierra Club (letter)

The Sierra Club (presentation)

Southwest Conservation District

Surfrider Foundation

Jim Tarantino

Thanks But No Tank

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SECTION 1

ONLINE COMMENT FORM RESPONSES

The following tables present the responses received through an online comment form (see Appendix) which asked a series of questions about each draft ocean planning goal. Each of the three tables corresponds to one of the draft goals.

Comments on Draft Goal 1: Effective Decision Making

First Name	Last Name	Affiliation	Goal 1 General Comments		
			Like	Would Change	Other Comments
Tyler	Archer	Surfrider Foundation	the use of maps and extensive data collection as the basis for effective decision making. Its important to properly determine where uses occur now and where they are likely to occur in the future, especially on a regional scale.	what type of data is being mapped. SeaPlan has already done an amazing job working on the maps displayed at the RPB meetings. One missing piece is a review of public access to the waterfront. Overall, while ocean planning may be primarily focused on larger scale operations such as fishing, transport and energy, it is also important to remember how plans could affect the everyday lives of the general public using the ocean for recreational purposes.	
Marcia	Hart	citizen			First and foremost, the public has not effectively been engaged in this process. A small few of the public have any clue this process or the Mass Ocean Planning exists. Locally arranged info sessions that are properly advertized are necessary with stories in the local newspapers and on public access cable ahead of your arrival for feedback. As it is set up, you end up constantly talking to stakeholders of ENGO's and

First Name	Last Name	Affiliation	Goal 1 General Comments		
			Like	Would Change	Other Comments
					<p>those who will be bidding for the future leases on ocean resources or their mouthpieces or large interest groups. These groups may represent many people but it is not the general public.</p> <p>As interest groups have been solicited or chosen to participate, I have noticed that fishermen and their organizations have been poorly represented locally and I imagine regionally. Gloucester's Fishermen are not involved, our marine railways are not involved, our processors are not involved. Yet recreational boating has had two major studies done in the last few years. Commercial fishing needs to be valued using the template of the recreational boating survey where every possible adjunct and side dollar is calculated in the value of the industry. When fishing is valued it is simply done on pounds of fish. Use the recreational model and the value will rise enormously. What if recreational boaters could only report the price of the fish caught as the model used for their worth? Their</p>

First Name	Last Name	Affiliation	Goal 1 General Comments		
			Like	Would Change	Other Comments
					value would plummet, that is why it wasn't done that way. There should be a level playing field for evaluating industry values, not each editorializing on how fabulous they each are, incorporating every conceivable additional dollar they might somehow think they contribute. The means to value small commercial fishing boat businesses needs to be developed, which includes the multiplier effect to a community like Gloucester of boats buying fuel, food, rope, being repaired, paying monitors, paying bookkeepers, paying lawyers etc, and coming in with a catch where the money goes directly into local banks and is spent locally on mortgages, cars, family expenses,etc. A true understanding of this is what would respect and preserve our heritage and our values and would serve to better fulfill the policy:" Foster a public understanding of the value of the ocean, our coasts and the Great Lakes to build a foundation for improved stewardship." Also included should be our

First Name	Last Name	Affiliation	Goal 1 General Comments		
			Like	Would Change	Other Comments
					maritime heritage and it's long term economic contribution. Shouldn't the value of fresh, wild, fish and its protein value find a place in this national discussion. Traditional sources of protein are excessively land intensive. Fish is a perfect protein source if we steward the ecosystem as the Plan intends to do. Fish should ultimately become sustainable. I certainly believe this is true for the part of the ocean off Gloucester, if something else with toxic or habitat degrading capacity isn't put there instead. The question is who is going to catch them or "grow" them. My answer is that small floating local businesses that give back to the community should be who ends up having this economic opportunity. . The 400 year history of this community should matter according to the over arching policies and principles these plan stand on.

First Name	Last Name	Affiliation	Goal 1 General Comments		
			Like	Would Change	Other Comments
Mike	Leonard	American Sportfishing Association	<p>Improving interagency coordination in decision-making is likely where the regional planning body holds the most potential value and therefore it is appropriate for this to be a primary goal of the regional planning body. A recent example where improved interagency coordination through the National Ocean Policy yielded benefits for all interested parties was the recently revised policy of the Bureau of Safety and Environmental Enforcement for evaluating proposals to convert obsolete, offshore oil and natural gas production platforms into artificial reefs, which hold tremendous value as productive fishing grounds. Working through the National Ocean Council, the numerous federal and state agencies and stakeholder groups met to discuss and identify policy changes that would allow the states the greatest flexibility in their artificial reef planning while balancing environmental considerations with the various other uses for the structures and reefing areas. This win-win for all parties involved was made possible by the opportunity provided through the National Ocean Council to bring these previously non-communicating groups together. By serving as a conduit to bring together agencies and stakeholder for the purpose of increasing interagency coordination in terms of management and regulatory programs and data sharing, the RPB could hold great value in addressing complex multi-jurisdictional regional issues.</p>	<p>The RPB must identify early on which specific regulatory processes are appropriate to address and facilitate within the RPB. Additionally the RPB must set in place guidelines and structure to ensure that it will in fact improve government efficiency in these identified areas rather than simply add another layer of bureaucracy that complicates and slows down public policy.</p> <p>A specific recommendation is to add the phrase “where appropriate” at the end of the action: “Increase interagency coordination across management and regulatory programs.” Certainly the RPB does not intend to become involved in each and every management and regulatory program within the region as in many cases interagency coordination is unnecessary and/or inappropriate.</p>	

First Name	Last Name	Affiliation	Goal 1 General Comments		
			Like	Would Change	Other Comments
Carissa	Lord	Rhode Island Chapter of Surfrider Foundation	"Increased transparency and better public understanding." This will be key throughout the process in order for this planning effort to be adopted by stakeholders.	What is "Effective Decision Making"? If a decision is made, is it effective? I like Coordinated or Collaborated Decision Making.	Get the public involved, educated, engaged, early in the process. Meanwhile, pull together your existing data across all agencies to see where your starting point is.
John	Cosgrove	volunteer w/Save The Bay, local scuba instructor	This is the responsible this to do. I am also currently working with Woods Hole Oceanographic on a project to provide so of the discussed science data (OOI).	N/A	
Heather	McElroy	Barnstable County, Cape Cod Commission	I like the focus on intergovernmental coordination, especially for this first round of NROC's goal-setting. NROC's jurisdictional area is different than other entities, but there is lots of overlap with work already completed at the state and county levels. Ensuring that NROC's policy work integrates well with existing efforts is extremely important. Later, this goal may fall away, once relationships are established.	Not to wordsmith too much, but "reflect" ever changing social, enviro, etc. doesn't say a lot to me. Perhaps "incorporate changing social, enviro, and tech conditions into decision processes."	a, c, and e are also very important objectives. However, (a) seems somewhat obvious/necessary, (c) is very important, but hopefully you'll be doing your best on this front anyway, and (e) is of great interest, but perhaps less immediately relevant to this goal.
Sarah	Smith	Environmental Defense Fund	I especially like outcome 6, incorporating science into decision making on an adaptive basis	Under Potential Outcome 1, I think this can result in improved decision-making overall, with better outcomes, not just more expedient processes	
Stephen	Miller	Islesboro Islands Trust	"Engagement and collaboration"	What does "improved decision-making time" actually mean? There are occasions when insufficient time has been given to research and review of relevant environmental, social and cultural facts and considerations during an agency's decision-making process. There have been times when insufficient agency staffing	

First Name	Last Name	Affiliation	Goal 1 General Comments		
			Like	Would Change	Other Comments
				<p>resulted in delays. Therefore, improving effective decision-making may be a more appropriate goal.</p> <p>This goal and its potential outcomes fail to indicate how any decision-making process can better incorporate regional priorities, public engagement and collaboration, all of which are important goals.</p> <p>A potential outcome of Goal One is to reduce appeals and conflicts. How might this be accomplished and at what cost? Reduction in appeals and conflicts suggests to us better engagement and collaboration, which may take more time in the decision-making process than anticipated.</p>	
Clinton	Townsend		Improved interagency coordination and informing and engaging the public		<p>This work needs to be perceived by the general public as in the public interest, and should be readily translatable into action at the local and regional levels by town managers, planning boards, public works agencies, private contractors and other 'boots on the ground' entities engaged in the day-to day work that has a direct impact on the environment.</p>
Eva	Korpi			No ocean mining	

First Name	Last Name	Affiliation	Goal 1 General Comments		
			Like	Would Change	Other Comments
Ann	Molloy				Fishermen should be the priority.
Renee	Walker		No ocean mining!		
Susan	Waller	independent artist, advocate for fishermen	Coordination and transparency are critical factors		Coordination and transparency are critical factors.
William	Waller	school teacher, independent scientist	Coordination and transparency are critical factors		Coordination and transparency are critical factors.
EDNA	BEAUDOIN	concerned citizen of Cape Ann			NO OCEAN MINING
	anonymous				no ocean mining
Doreen	Wonson	None			No ocean mining of our fishing grounds!
Suzanne	Gilbert	Citizen	create and maintain effective communication between independent commercial fisheries, marine business, marine research groups, government agencies, scientific community and the residents of communities with marine based economies in creating any planning that would impact the ocean and marine environments.	The current discord between the government and local marine economies which are being destroyed by NOAA's unfair administration of the Magsun-Stevens Act.	
	anonymous		NO OCEAN MINING!!		
Heather	Buonopane	None		No mining please !!	
Dawne	Flanders				No Ocean mining of our fishing grounds, this is our livelihood
Stephen	Flanders				No Ocean mining of our fishing grounds, this is our livelihood
Katherine	Flanders				No Ocean mining of our fishing grounds, this is our livelihood
Ellen	Byrne		NO OCEAN MINING!!!		

First Name	Last Name	Affiliation	Goal 1 General Comments		
			Like	Would Change	Other Comments
Walt	Kolenda	Gloucester resident	No ocean mining!	No ocean mining!	
Judy	Atkinson			NO OCEAN MINING!!!!!!!!!!!!!!	
Ann	Banks	citizen of Gloucester, MA		any incursion on traditional fishing grounds needs to be avoided.	
justin	demetri	port community alliance			No mineral extraction from our fishing grounds. No fossil fuel exploration or drilling: natural gas, oil, methane hydrate etc...
Peter Parsons	Peter	Gloucester Native, Former Commercial Fisherman, conservation Activist, L.I.C.S.W.	Keeping the public INFORMED, and listening to local ISSUES	e. Include information about municipal DEVELOPMENT ISSUES/"data" impacting "Ocean Planning", ex: DPA, wetlands, and Working Waterfront ISSUES	Coastal municipalities need to be engaged in PROACTIVE PLANNING, re: Climate Change and Flooding.
Susan	Stevens			No mineral extractions from our fishing grounds and surrounding waters!	
Laurel	Tarantino	Concerned citizen			No mineral mining on our fishing grounds and surrounding waters. No ocean mining or fracking in any of the North Atlantic or other Oceans for that matter. Man has screwed up enough things on Earth in the name of greed, it's time to stop.
James	Tarantino	Port Community Alliance			Goal One should be Healthy Ocean and Coastal Ecosystems. Ridiculous to list "Effective Decision Making" as Goal one and has the stink of manipulative Beauraucracy. Stop Global

First Name	Last Name	Affiliation	Goal 1 General Comments		
			Like	Would Change	Other Comments
					Corporations from ruling the Oceans by imposing a permanent moratorium on Ocean mineral extraction, to protect, restore and maintain healthy ocean and coastal ecosystems. Good Luck!
Carmen	Lee	Socially engaged citizen interested in marine conservation, Gloucester resident, retired academic researcher	d. "coordinate and leverage science..." - the most comprehensive and well-rounded of all the Actions - addressing regional PRIORITIES is very important (because it is essential to focus on priorities rather than on "nice-to-haves" and it forces one to IDENTIFY what these priorities are - helps to establish objective criteria	"Inform and engage the public for better decision-making"- please consider refining and defining this Action - As a concerned citizen, taxpayer, and major donor to marine conservation projects, I am a firm believer in transparency and accountability of all parties involved in a project, campaign, or piece of legislation. - But I think informing and educating everyone (stakeholders, general public, etc.) is different from making efforts to *engage the public in decision-making*. Such efforts -- while certainly laudable and make great sound-bites -- may or may not be of real help to the ocean planning process. - For example, in the case of public meetings, is the *primary* goal to inform people of the work being done and planned, or to provide a venue for the public to	

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			Like	Would Change	Other Comments
				<p>say whatever they have to say so that they can "get things off their chest", or gather opinions of attendees for serious consideration? If the main objective is to record views of attendees for careful analysis later, how are/should these public comments be used and weighed in the decision-making process (bearing in mind that quite a few of these feedbacks are neither constructive nor well-informed, more as exercises in venting steam and spouting pet peeves rather than articulation of thoughtful opinions)?</p> <p>- IMHO "the public" (and their views) come in vastly different shapes and sizes; there is no one entity stamped "the public". My concerns are: i) saying that you want to reach out to "the public" is so vague as to be meaningless; ii) these public engagement efforts may produce lopsided and distorted pictures (in the sense that only voices of "squeaky wheels" are heard).</p> <p>- It would be much more helpful to identify/ break down/ spell out what is meant by "public" (e.g. readers of local media/newspaper is a segment of "the public", and to</p>	

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			Like	Would Change	Other Comments
				inform/reach them requires one type of action that is different from actions to educate school kids who are "members of the public" as well). Also to answer questions such as: "What is the real purpose of these public engagement efforts?" "How specifically does each kind of public engagement action benefit and advance decision-making?"	
Alexander	Moffat	shoreside land holder	integration of best available knowledge		Decisions need to be able to be made - if the science calls for it - even if they are extremely unpopular.
Jeffrey	Davis	Surfrider Foundation - Maine Chapter	The RPB's commitment to interagency cooperation and focus on informing and engaging the public to better inform decision-making is a sound goal that can be achieved by improving the methods by which the public is engaged in the process and allowed to comment. Increasing opportunities for public engagement by providing ample meetings in each state and multiple platforms for the public to offer comment - through video streaming, internet-based participation, social networking media, and in-person meetings - will greatly improve this process.		

Comments on Draft Goal 2: Healthy Ocean and Coastal Ecosystems

First Name	Last Name	Affiliation	Goal 2 General Comments		
			Like	Would Change	Other Comments
Tyler	Archer	Surfrider Foundation	the focus on critical marine and coastal habitats, and really working in the connection of "watersheds" and coastal life, especially in terms of pollution.		
Robin Hadlock	Seeley	Shoals Marine Laboratory, Cornell University	Respect the intrinsic value of the ocean, its biodiversity, and act as its steward/caretaker.	I would add this as an action: "Identify activities that have multiple negative impacts on habitat, species of conservation concern, and biodiversity, such as wild seaweed harvesting/removal, and work to find alternative activities to replace them, such as seaweed farming."	Develop strategies for improving ecosystem management rather than "one species at a time" management. For example, the State of Maine is starting to develop fishery management plans, but says they don't have the resources to do ecosystem-based fishery management. So, in 2013, the state is writing individual species management plans. This is an outdated, non-ecological way to manage fisheries in the 21st century. Encourage the formation of ecosystem-based fishery management plans. Habitat-destroying activities (dragging the bottom, harvesting of wild seaweed beds) must be discouraged, and alternative activities encouraged.
Mike	Leonard	American Sportfishing Association	By collecting and developing maps that identify important species and habitats, the RPB can provide agencies with important information to better inform decision-making.	The RPB must define what specifically is meant by the term "planning framework." Given that the RPB holds no regulatory authority, it is unclear what form a "planning framework" would take and what its implications would be from a management and regulatory standpoint.	

First Name	Last Name	Affiliation	Goal 2 General Comments		
			Like	Would Change	Other Comments
				<p>Within the goal statement, we suggest replacing the word “protect” with “conserve.” For many, these two words are used interchangeably but functionally they represent substantially divergent views of resource management. “Protect” signifies a desire to prohibit human interaction with a resource, whereas “conserve” indicates a desire to manage for wise and sustainable use of the resource for the benefit and enjoyment of the public. We urge the RPB to be cognizant of these fundamentally different approaches toward resource management and consider the historic missions of federal and state resource agencies, which are in line with the principle of “conservation” rather than “protection.”</p> <p>We recommend removing the phrase “and act as its steward/caretaker” from the goal description. This is a highly subjective phrase that implies that the Regional Planning Body holds or assumes management authority over the ocean and its resources, which it does not.</p> <p>While there is certainly value in the RPB serving as a conduit to collect and disseminate regional maps of ocean resources and human uses, we urge the RPB to use caution in exploring actions to “(i)identify</p>	

First Name	Last Name	Affiliation	Goal 2 General Comments		
			Like	Would Change	Other Comments
				<p>opportunities within existing regulations and authorities for restoration and protection.” Numerous federal and state laws are in place to facilitate the conservation and restoration of species and habitats. It is unclear how the RPB can serve to improve upon, rather than interfere with, these existing processes. Prior to the establishment of this and similar goals and actions, the RPB should deliberate and decide upon which specific policies and processes are in need of improved interagency coordination. If inadequacies in existing restoration efforts are identified, then it may be appropriate for the RPB to identify as one of its goals to serve in some capacity to improve those efforts. However, absent this type of initial analysis and identification, we fear that the RPB may be creating a solution in search of problems.</p> <p>We also recommend removing the action to: “Prioritize science and research needs to fill key gaps in knowledge.” The RPB has no scientific or research collection capabilities, and it would be inappropriate for it to develop directives on how federal and state agencies within the region manage and apportion their own science and research programs.</p>	

First Name	Last Name	Affiliation	Goal 2 General Comments		
			Like	Would Change	Other Comments
				Finally, given the National Ocean Policy's emphasis on spatial resource protection, a significant concern within the recreational fishing and boating community is that the National Ocean Policy and the Regional Planning Bodies will serve as a means to close areas of the ocean to the recreating public including recreational fishermen. We wish to remind the RPB that page 23 of the National Ocean Policy Implementation Plan notes that, "commercial and recreational fishing will continue to be managed exclusively by the relevant State and Federal fisheries managers and Regional Fishery Management Councils or Commissions." The RPB must be forthright that it does not seek to explore regulatory changes that may result in the unnecessary prohibition of public access to public resources.	
Carissa	Lord	Rhode Island Chapter of Surfrider Foundation	I like accounting for changing environmental conditions.	I would hope that the actions of this goal do not hinder the progress of other goals aimed at identifying future uses.	Start by gathering existing information then engaging stakeholders later to help identify and refine areas.
John	Cosgrove	volunteer w/Save The Bay, local scuba instructor	Again, the is the responsible thing to do. In my teaching scuba diving, I stress concepts of stewardship and being a caretaker, not a "abuser". Look at Project AWARE and other PADI programs for examples.		

First Name	Last Name	Affiliation	Goal 2 General Comments		
			Like	Would Change	Other Comments
Heather	McElroy	Barnstable County, Cape Cod Commission	I like the language of this goal and the focus on being a steward of the ocean.	I would make it a bit stronger by moving "intrinsic" up to the first sentence, indicating the importance of establishing a planning framework to protect both natural and human values in the ocean; the latter depending on the health of the former.	<p>In (c), Does "sustenance" mean for human consumption? This could be clarified; in the end, eating fish in the northeast is not a necessity. This item may be more of an economic priority, and if so, state it as such.</p> <p>Do the priorities need to state "within existing regs and authorities?" I understand that this is part of your mandate, but perhaps that could be stated generally rather than within each priority statement, where it is a little distracting. So, could (d) state "Identify opportunities for habitat restoration adn protection"?</p> <p>(b) and (f) are both very important. Clearly there are areas where more and less information is available, and info for a given resource won't be consistent across the plannign area. Identifying critical habitat or use areas consistently across the planning area would be a great achievement, and way to help prioritize (f).</p> <p>Time and money should be spent on (e) only to the extent they will result in reasonably accurate projections.</p>
Sarah	Smith	Environmental Defense Fund	Recognition of climate change/changing environmental conditions	Note that areas of regional importance and maps will need to be reviewed periodically to reflect changing environmental conditions	

First Name	Last Name	Affiliation	Goal 2 General Comments		
			Like	Would Change	Other Comments
Stephen	Miller	Islesboro Islands Trust	"protect, restore, and maintain healthy ocean and coastal ecosystems that provide social, cultural, spiritual, and economic benefits. Respect the intrinsic value of the ocean, its biodiversity, and act as its steward/caretaker, recognizing humans as part of the ecosystem."	Public input into definitions and characterizations of "important, significant, or valuable area" is essential, including "citizen science" such as water quality monitoring data. It is not enough to "identify opportunities within existing regulations and authorities for restoration and protection." It strikes us as clear that existing opportunities and regulations have failed to adequately protect and/or restore critical marine species and habitat. New protective regulations and opportunities are necessary now, more than ever.	
Clinton	Townsend		Outcomes 1 and 5, Actions 2 and 5		Again, I want to emphasize the need for engaging the public (after all, they are the taxpayers) in understanding both the needs and the actions required to address those needs. The connection between the uplands and the ocean by way of rivers and streams needs to become a part of every one's mental landscape. Not just water quality, but 'connectedness' needs to be considered. River eco-systems are broken by dams, and that needs to be addressed.

First Name	Last Name	Affiliation	Goal 2 General Comments		
			Like	Would Change	Other Comments
Ann	Molloy			Healthy oceans don't like drilling of any kind. Leave it alone for the Fishermen.	Please don't listen to the corrupt, bought out scientist from CLF, Nature's Conservatory, Pew, EDF, etc... Follow the money trail to the bought out scientists.
Susan	Waller	independent artist, advocate for fishermen			Ocean mining will definitely jeopardize the ocean ecosystems and its many human benefits. Do not consider this disruptive extractive industry.
William	Waller	school teacher, independent scientist			Ocean mining will likely jeopardize the ocean ecosystems and its many human benefits. Do not consider this disruptive extractive industry.
EDNA	BEAUDOIN	concerned citizen of Cape Ann			NO OCEAN MINING
	anonymous			make draft goal two draft goal one	no ocean mining
Doreen	Wonson	None			No ocean mining of our fishing grounds!
Suzanne	Gilbert	Citizen			on option "C" above - please define whose sustenance is being discussed.
Dawne	Flanders				No Ocean mining of our fishing grounds, this is our livelihood
Stephen	Flanders				No Ocean mining of our fishing grounds, this is our livelihood
Katherine	Flanders				No Ocean mining of our fishing grounds, this is our livelihood
Walt	Kolenda	Gloucester resident	No ocean mining!	No ocean mining!	No ocean mining!
justin	demetri	port community alliance			No mineral extraction from our fishing grounds. No fossil fuel exploration or drilling: natural gas, oil, methane hydrate etc...
Peter Parsons	Peter	Gloucester Native, Former Commercial	Consider restoring the Fish Hatchery on Ten Pound Island,		ABOVE, also harvesting BIOFUELS. NEPTUNES HARVEST may provide a

First Name	Last Name	Affiliation	Goal 2 General Comments		
			Like	Would Change	Other Comments
		Fisherman, conservation Activist, L.I.C.S.W.	Gloucester, and other efforts promoting species sustainability.		"Model" for Sustainable Industrial Businesses within Coastal Communities. Survey previously viable sites, ex: Lanes Cove, Lanesville, (GLO) as viable "Working Waterfronts" and "ECONOMIC DRIVERS"
Carmen	Lee	Socially engaged citizen interested in marine conservation, Gloucester resident, retired academic researcher	f. Prioritize science and research needs... - this means /calls for identifying what are these key gaps (which is critical since making plans and decisions when key gaps still remain is seriously troubling, unwise, and highly inefficient) - scientific information and research results play an indispensable role in setting objective criteria		
Alexander	Moffat	shoreside land holder	protect, restore, and maintain healthy ocean and coastal ecosystems ... Account for changing environmental conditions and new information as it becomes available. Respect the... biodiversity, and act as its steward/caretaker.		
Jeffrey	Davis	Surfrider Foundation - Maine Chapter	Ecosystem protection should remain a key goal, with considerations made for spiritual identity as well as the health of the marine ecosystem including habitats,		Protection of non-consumptive recreational areas is a vital consideration in ocean planning. Millions of people come to New England's beaches for enjoyment. Activities such as surfing, kayaking,

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			Like	Would Change	Other Comments
			biodiversity, and ecological function. These priorities will help safeguard the ocean from the damaging effects of misuse, overuse and pollution.		wildlife viewing, windsurfing, and soaking in the sun create memories that greatly enrich the lives of many. These activities are part of an active and healthy lifestyle and generate billions of dollars in economic benefits for coastal communities and region as a whole. -->Public process A transparent process that includes ongoing opportunities for the public to share viewpoints is key, and I appreciate and value the opportunity to comment on the RPB's draft goals and action items. Continued attention to improving communication methods and providing multiple avenues toward commenting, including in-person and electronic methods, along with adequate time to comment and a comprehensive and clear website with background materials, will continue to enhance this process. To that end, I strongly encourage the RPB to consider the following recommendations: * Develop an electronic public comment portal on the NE RPB website that enables the public to provide comments to the RPB at anytime during the planning process.

First Name	Last Name	Affiliation	Goal 2 General Comments		
			Like	Would Change	Other Comments
					<ul style="list-style-type: none"> * Provide ample notice of all RPB-related meetings including RPB and committee or advisory panel meetings and make all relevant meeting documents available well in advance of meetings. * Clearly define how written comments can be submitted and how they will be reviewed, and give written comments equal weight to public comments made during meetings. Written comments should also be made available to the public.

Comments on Draft Goal 3: Compatibility Among Past, Current, and Future Ocean Uses

First Name	Last Name	Affiliation	Goal 3 General Comments		
			Like	Would Change	Other Comments
Tyler	Archer	Surfrider Foundation	as before, I like the recognition the connection between inland resource use and ocean impacts. This is very important to understand and incorporate.	I think there needs to be a strong focus on climate change and relative sea level rise, and the potential problems they can cause for coastal cities, towns and businesses.	
Mike	Leonard	American Sportfishing Association	The RPB can serve an important role in providing data and maps and facilitating interagency dialogue to can improve the coordination of marine activities and ensure smarter planning of current and future activities. For example, a study of the Massachusetts Ocean Plan found that smarter ocean planning via taking into consideration key fisheries habitat when identifying wind turbine placement would yield \$10 billion more for the energy sector and keep fisheries losses to less than \$1 million compared to status quo. The RPB should work to facilitate such discussions ad hoc and where appropriate, rather than attempt to develop a regional plan as to where human activities can and cannot take place.	As stated in response to draft Goal Two, the RPB must define what is meant by the vague term "planning framework." We must note that the RPB that holds no regulatory authority and as such, it would be inappropriate for the RPB to develop any framework that is intended to regulate where human activities can and cannot take place. In addition, it should be clarified that the work of the RPB is to help develop and provide information for agencies to consider in their activities and that no new decision-making activities will take place within the RPB. It is unclear why the RPB would attempt to "(a)ssess current and foreseeable trends in commercial fishing in New England, relying on information available through fisheries management efforts," and ignore similar trends in recreational fishing. We suggest adding the term "recreational and" before the term	Assess current and foreseeable trends in recreational fishing in New England, relying on information available through fisheries management efforts Recreational fishing is enjoyed by approximately 40 million Americans each year with a \$115 billion impact on the nation's economy supporting 828,000 jobs. However, because recreational fishing expenditures are more diffuse and its impact on fisheries resources are considerably less when compared to commercial fishing (recreational fishing is responsible to only 2 percent of all fish harvest; commercial fishing is responsible for the other 98 percent), its importance is too often overlooked. Included in these comments is ASA's publication "Sportfishing in America," which, in addition to providing economic and demographic recreational fishing statistics state-by-state, also provides a description of the important role that anglers and boaters play in funding aquatic resource conservation through fishing license sales and excise taxes.

First Name	Last Name	Affiliation	Goal 3 General Comments		
			Like	Would Change	Other Comments
				"commercial" in this potential action. While we may assume that the exclusion of recreational fishing was simply oversight, it reinforces a longstanding concern within the recreational fishing community that the economic, social and cultural values of recreational fishing are too often overlooked among decision-makers.	In fact, anglers, hunters and recreational boaters provide the backbone of conservation funding in the U.S. through the unique "user-pay, public-benefit" Wildlife and Sport Fish Restoration Programs. Also attached to this submission (last page of attached pdf) is a document that describes the significant contributions that anglers, boaters and hunters make towards ensuring the sustainability and future enjoyment of our nation's natural resources. We respectfully urge the RPB members to review these materials which will help to gain a greater understanding of the importance of recreational fishing as much more than a simple weekend pastime.
Carissa	Lord	Rhode Island Chapter of Surfrider Foundation	"Facilitate increased understanding and coordination among stakeholders."	Assess and map where possible areas suitable for offshore renewable energy uses.	Collect your current use data before moving forward.
John	Cosgrove	volunteer w/SaveTheBay, local scuba instructor	The goal appears laudable, but the future uses phrase allows groups like Hess and their LNG interests to use the large sums of money available to create a situation of "negative public interest", and try to railroad their will on the local population without regard to public interest, environmental impact or other users of the waterways. Though Hess finally gave in, this particular battle seemed to fly in		After section c) items ii, iv and vi are addressed, consideration could given to iii, but stop there. Dumping is not good for the environment. Find other means of disposal and that includes dredge spoils. Narragansett Bay suffers every time they dredge, with silt being suspended in the water column for miles.

First Name	Last Name	Affiliation	Goal 3 General Comments		
			Like	Would Change	Other Comments
			<p>the face of local laws, public opinion, and even federal regulations (USCG rules of the road).</p> <p>The intent here is probably good, but this is too open to corporate interpretation. Limits on the scope of this goal should be set.</p>		
Heather	McElroy	Barnstable County, Cape Cod Commission	I like the overall sentiment of this goal, especially "minimizing user conflict and impacts to environmental and cultural resources."	I keep tripping over the last sentence, facilitate understanding btw user groups; this seems more of an outcome or a process piece than what to me seems to be the important part of the goal - creating a planning framework to promote compatible uses.	<p>speaking for the county, finding offshore sources of compatible sediment, with minimal impact to the environment, is a priority. Same for siting renewable energy facilities, far enough offshore that the visibility and user conflict issues are less.</p> <p>Really the only element listed here that seems to be less of a priority (mostly because it is relatively well understood on the Cape) is item vi.</p>
Sarah	Smith	Environmental Defense Fund		<p>It seems like the two outcomes related to infrastructure needs are redundant and should be combined into one outcome.</p>	
Stephen	Miller	Islesboro Islands Trust	"Recognize local priorities..." and "assessment of regional coastal and ocean economy."	<p>Considerations of regional infrastructure needs must be tied to clear public interests and incorporated into decisions to benefit the people and the region's ecological foundation. When identifying shoreside infrastructure needs, the prioritization process should also consider any shoreside infrastructure's problems and excesses and opportunities to</p>	<p>Reconstruct or maintain historical marine uses where appropriate</p> <p>Protect, maintain and enhance current sustainable uses</p> <p>Prevent future uses that would degrade or threaten appropriate past and current uses</p>

First Name	Last Name	Affiliation	Goal 3 General Comments		
			Like	Would Change	Other Comments
				diminish or remove those negative contributions to a region's economic and environmental balance and well-being.	Remove current uses that are unsustainable or which degrade the environment
Clinton	Townsend		Outcomes 2 and 5, Actions 1 and 2(f)		Public engagement and support!!!
Ann	Molloy			Once areas are disturbed, fishing will suffer. Leave them alone for our Fishermen. Food is the most important thing. Don't mess with it please.	Rely on Fishermen, not scientist who are on the take. Do not allow mining or energy exploration on our rich fishing grounds.
Susan	Waller	independent artist, advocate for fishermen	The recognition that our past ocean uses inform our future uses.	Recognize that some past uses have been detrimental to the ocean's overall health and productivity (e.g. bottom dragging, factory ships, wasting bycatch, overzealous enforcement), where we should be trying to mend the damage. I am against any form of aquaculture, because it invariably destroys the natural habitat.	Concentrate on fostering sustainable and renewable resources. Ocean mining goes against this key focus. Developing renewable sources of energy that do not contribute carbon or thermal pollution (wind energy, tide energy, wave energy) are vital to our future well-being. Reevaluate aquaculture farming with a critical eye towards the health of the ocean ecosystems.
William	Waller	school teacher, independent scientist	The recognition that our past ocean uses inform our future uses.	Recognize that some past uses have been detrimental to the ocean's overall health and productivity (e.g. bottom dragging, factory ships), where we now are trying to mend the damage.	Concentrate on fostering sustainable and renewable resources. Ocean mining goes against this key focus. Developing renewable sources of energy that do not contribute carbon or thermal pollution (wind energy, tide energy, wave energy) are vital to our future well-being. The tension between harvesting wild seafood and aquaculture will only increase. This tension needs to be deliberated openly with all stakeholders weighing in.

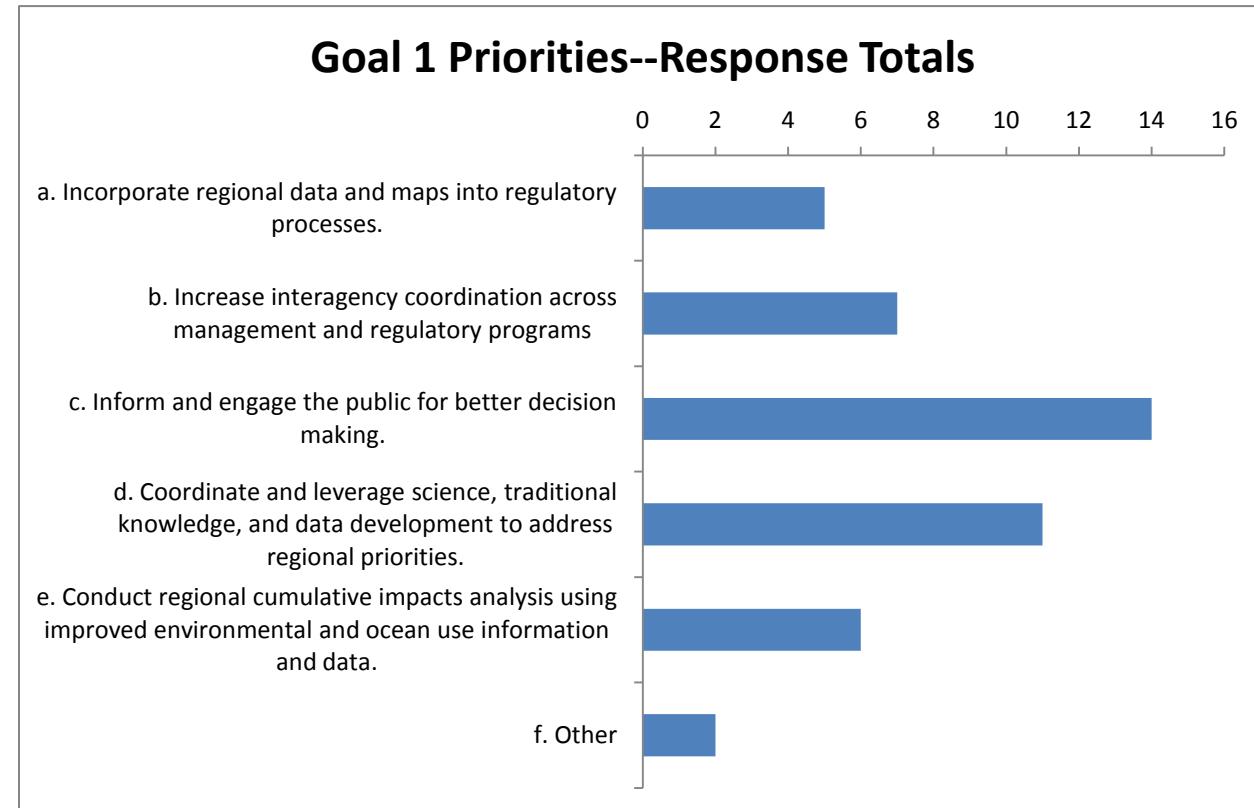
First Name	Last Name	Affiliation	Goal 3 General Comments		
			Like	Would Change	Other Comments
EDNA	BEAUDOIN	concerned citizen of Cape Ann			NO OCEAN MINING!!!!
	anonymous				NO OCEAN MINING
	anonymous				no ocean mining
Mark	Ring	Gloucester Fisheries Commission			I hope that in all discussions about future uses of our resources every northeast fishery will have an opportunity to be at the table in any discussions about future decisions regarding these traditional fishing grounds
Doreen	Wonson	None			No ocean mining of our fishing grounds!
Damon	Cummings	none			Your mapping of fishing grounds is pathetically sparse. Do not rely on fisheries management. Ask fishermen and fishing organizations. You identify what birds are where beautifully but not what fish are where. Please see the file I uploaded.
Carmine	Gorga				No ocean mining!
Suzanne	Gilbert	Citizen	No Ocean Mining		NO OCEAN MINING EVER!
Dawne	Flanders				No Ocean mining of our fishing grounds, this is our livelihood
Stephen	Flanders				No Ocean mining of our fishing grounds, this is our livelihood
Katherine	Flanders				No Ocean mining of our fishing grounds, this is our livelihood
Walt	Kolenda	Gloucester resident			No ocean mining!
justin	demetri	port community alliance			No mineral extraction from our fishing grounds. No fossil fuel exploration or drilling: natural gas, oil, methane hydrate etc...

First Name	Last Name	Affiliation	Goal 3 General Comments		
			Like	Would Change	Other Comments
Peter Parsons	Peter	Gloucester Native, Former Commercial Fisherman, conservation Activist, L.I.C.S.W.	B. SURVEY POTENTIAL "PALEO SITES" ALONG CAPE ANN'S COAST		Use the fishing fleet as research & monitors. CONSIDER PERMACULTURE AS A SUSTAINABLE "DEVELOPMENTAL MODEL"
Carmen	Lee	Socially engaged citizen interested in marine conservation, Gloucester resident, retired academic researcher	the recognition that there are different stakeholders and parties involved		<p>THOUGHT #1:</p> <ul style="list-style-type: none"> - Instead of focusing on "uses" (and by extension "users"), please consider incorporating the concept of underlying INTERESTS and goals of all parties involved with the ocean in one way or another (e.g. residents of a coastal town, seafood consumers); yes, they all "use" the ocean, but it is important to understand the purpose for that "use" and what really they are interested in obtaining at the end of the day. - Applying this concept and lens can avoid "positional bargaining" (i.e. just considering the stated *positions*/stance of parties), pitching user A against user B, one party feeling that they are losing to another party or they are forced to concede/sacrifice. - The reason is that one can then view the decision-making process as trying to satisfy INTERESTS (not positions adopted by different groups of people), and can move beyond looking at the ocean as though it is a single fixed pie to be divided up, and the only task is to figuring out how best to carve this

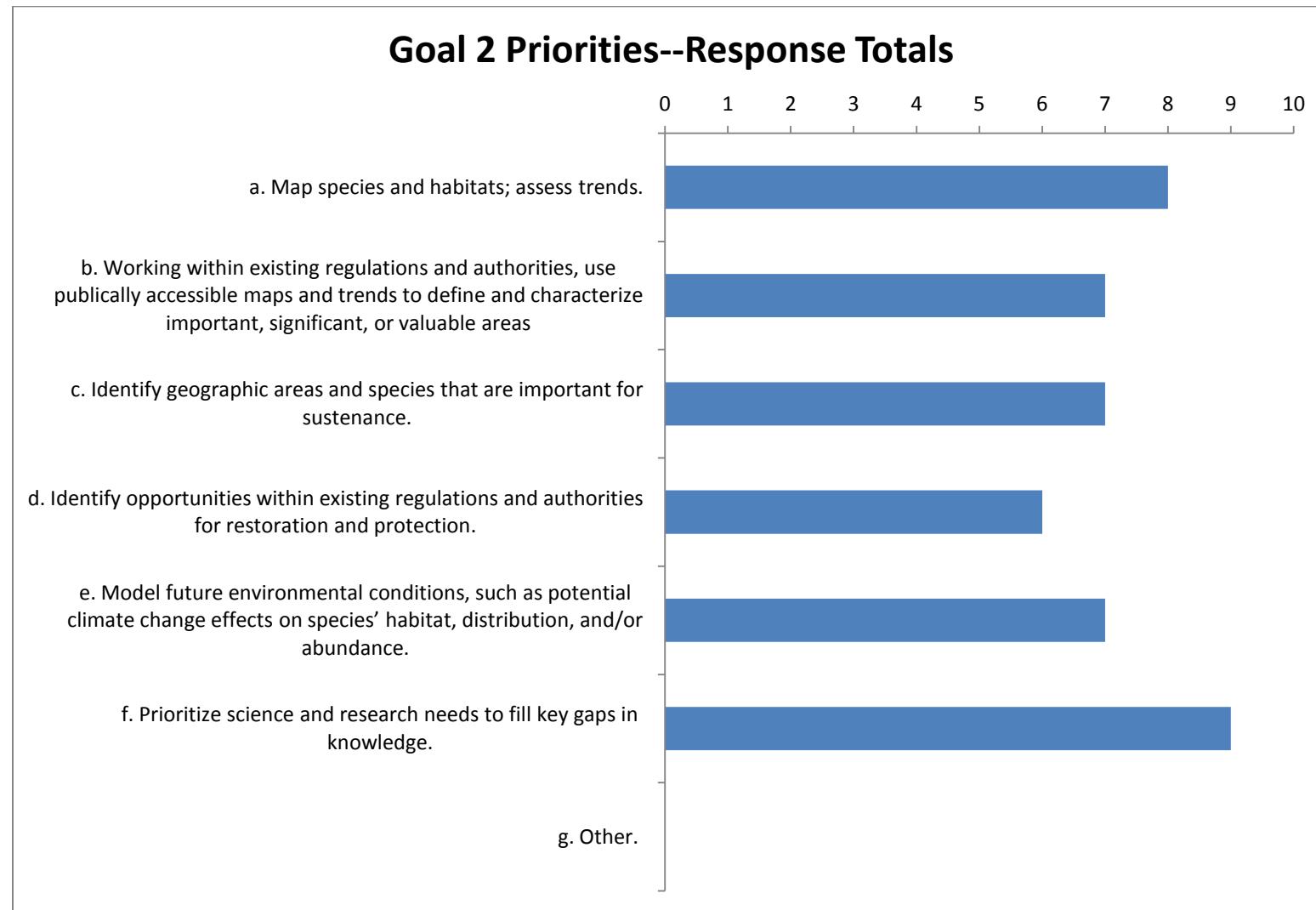
First Name	Last Name	Affiliation	Goal 3 General Comments		
			Like	Would Change	Other Comments
					<p>pie. Another analogy is two persons wanting the same orange: Instead of figuring out how to cut the orange (should A have a larger piece because she is really hungry, or should the orange be cut in two equal halves?) one looks beyond their stated position (i.e. "I want the orange") to the reason why they want the orange, why are they interested in the orange, and one discovers that A wants the orange to eat as a snack while B wants the peel for baking; so actually both interests can be satisfied without cutting the orange into slices.</p> <p>THOUGHT#2:</p> <ul style="list-style-type: none"> - establish right at the beginning of the decision-making process *ground rules and objective criteria* that all major stakeholders agree to follow and abide by <ul style="list-style-type: none"> - for example, a certain set/kind of scientific data - IMHO, agreeing on objective criteria is absolutely crucial and critical in getting the work done; without such agreement, the journey will be an uphill battle all the way and the final outcome may be less than satisfactory.
Alexander	Moffat	shoreside land holder	Develop a planning framework to encourage compatibility among... current and future uses of ocean and coastal waters		Future users of our oceans are an UNDER-REPRESENTED population in all negotiations regarding ocean use.

The graphs below show the priority actions chosen by people who completed the online comment form (see Appendix). Respondents could select more than one priority for a goal. A total of 22 people indicated their priorities for at least one of the goals.

Goal 1 Priorities



Goal 2 Priorities



Goal 3 Priorities

Goal 3 Priorities--Response Totals

0 2 4 6 8 10 12 14

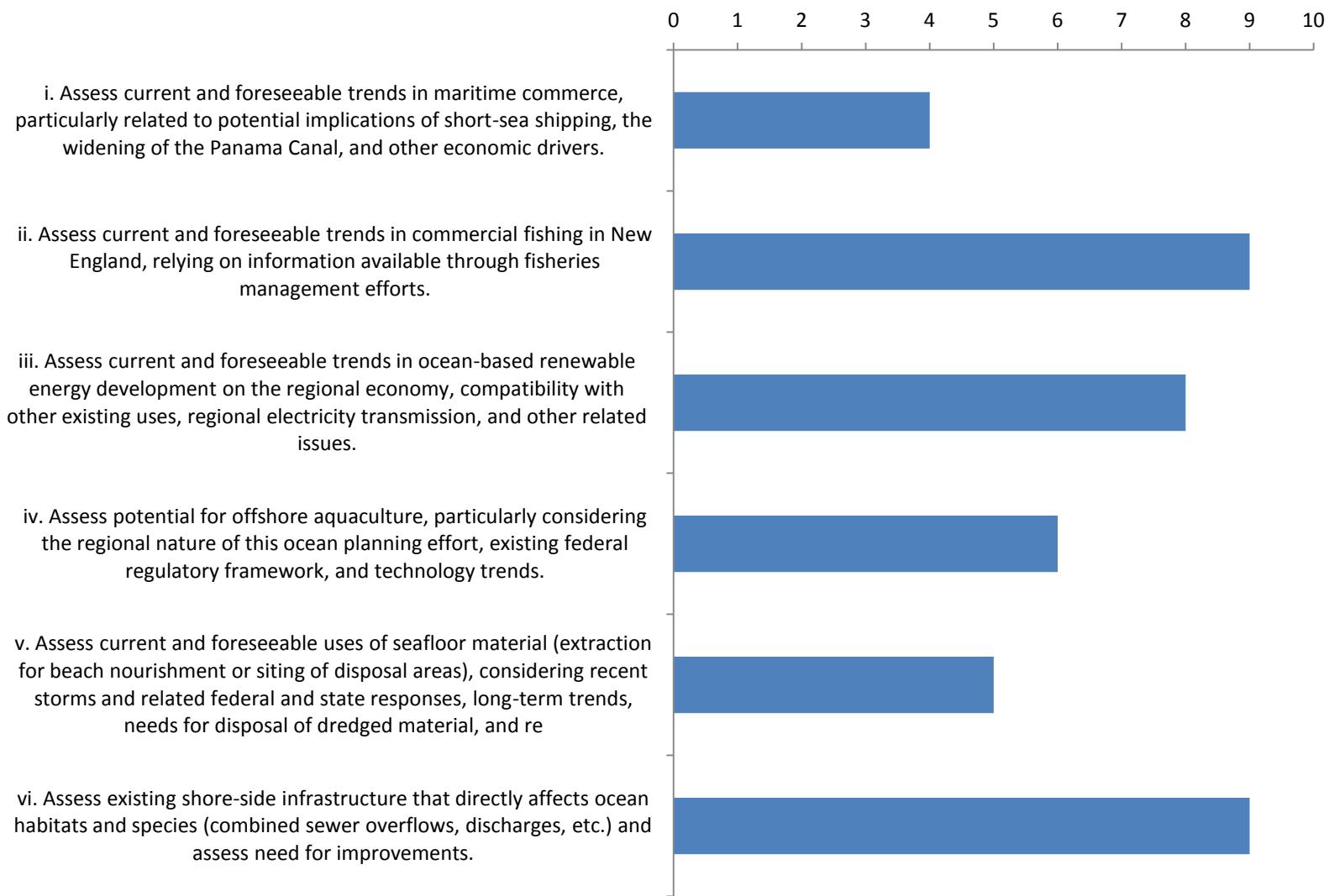
a. Identify and where possible map existing uses (fishing, boating and other recreation, shipping and commerce, etc.) and related infrastructure. Identify practical implications of new and changing activities on the regional economy and environmental and

b. Identify and map cultural and historic sites.

c. Enhance viability of and compatibility among new and existing ocean uses, specifically by considering the following, drawing upon existing sources of information where available and appropriate:

d. Other.

Goal 3, Part C Subquestion



SECTION 2

COMMENT LETTERS (ONLINE, MAIL, AND EMAIL)



American Sportfishing Association
Leading the Way for Sportfishing's Future

SPORTFISHING

in America



AN ECONOMIC FORCE FOR CONSERVATION



JANUARY 2013



WHAT IS THE AMERICAN SPORTFISHING ASSOCIATION?

The American Sportfishing Association (ASA) is the sportfishing industry's trade association committed to representing the interests of the entire sportfishing community.

We give the industry a unified voice, speaking out on behalf of sportfishing and boating industries, state and federal natural resource agencies, conservation organizations, angler advocacy groups and outdoor journalists when emerging laws and policies could significantly affect sportfishing business or sportfishing itself.

ASA invests in long-term ventures to ensure the industry will remain strong and prosperous, as well as safeguard and promote the enduring social, economic and conservation values of sportfishing in America.

ASA also gives America's 60 million anglers a voice in policy decisions that affect their ability to sustainably fish on our nation's waterways through KeepAmericaFishing™, our angler advocacy campaign.

ASA also represents the interests of America's nearly 60 million anglers who generated \$48 billion in retail sales with a \$115 billion impact on the nation's economy creating employment for more than 828,000 people in 2011.

This is Sportfishing in America

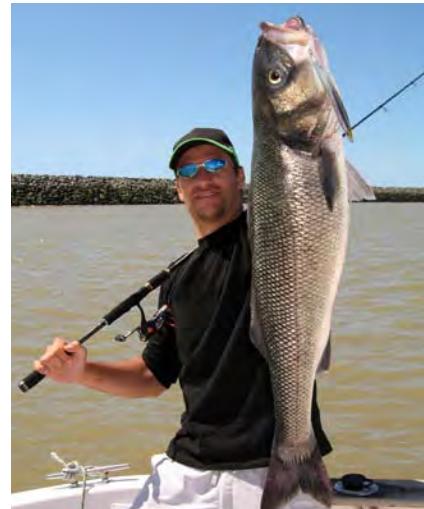
DRIVE PAST ANY LAKE, river or beach and odds are you will see people, even entire families, gathered along the shore or in boats fishing. Fishing is, after all, one of America's most enduring pastimes; something in which people of all ages can participate and an activity that millions of families and friends enjoy each year as a way to have fun together and spend time in the outdoors.

But fishing is more than just the thrill of the catch or a peaceful – and sometimes adventurous – escape. It's the foundation of an industry that supports more than 800,000 jobs involved in the manufacture, sale or provision of angling products and services, such as hotels, tackle retailers, boat builders, restaurants and more.

The U.S. Fish & Wildlife Service's (USFWS) *2011 National Survey of Fishing, Hunting and Wildlife-Associated Recreation* identifies fishing as one of the most popular outdoor recreational activities in the United States.

As many as 33 million people aged 16 or older participate in the activity, and spend \$48 billion annually on equipment, licenses, trips and other fishing-related items or events.

These funds help create and support more than 828,000 jobs in the United States at a time when many industries are still coping with a challenging economic climate. In some rural areas, the dollars brought in through recreational fishing help support entire communities.



*Anglers support more than
828,000 JOBS
in the U.S.*



Even more important are the vital conservation benefits fishing generates for our nation's waters and fish. Since the passage of the 1950 Federal Aid in Sport Fish Restoration Act, anglers have paid a federal excise tax on fishing tackle. In 1985 those taxes were expanded to include the federal excise tax on motorboat fuel in what is now known as the Sport Fish Restoration and Boating Trust Fund.

These tax revenues are distributed annually to state fish and wildlife agencies to help fund projects and programs that directly benefit fish, habitat and, ultimately, anglers and other recreational water enthusiasts.

In 2010 alone, the excise tax on sportfishing tackle amounted to \$390 million. Along with the \$657 million contributed by anglers through fishing license fees and \$403 million in private donations, anglers generated \$1.45 billion for fisheries conservation efforts.



SO HOW MANY ANGLERS ARE THERE?

Fishing is enjoyed by people of all ages. No one is ever too young or too old to enjoy a day on the water enjoying nature and catching fish. Based on the U.S. Fish and Wildlife Service's (USFWS) 2011 survey, there are 33 million anglers in the United States over the age of 16. Previous surveys by the USFWS indicated there was one youth angler (under 16 years of age) for every 2.5 adults over 16 years of age who fished.

If this ratio still holds, there are 13 million youths who fished in 2011, for a total of approximately 46 million anglers. Recent examinations of state fishing license records indicate many anglers will not buy a license every year.

Possibly one-third to one-half of people who consider themselves anglers may not be able to fish in a given year due to a variety of reasons.

Overall, ASA estimates approximately 60 million Americans may consider themselves to be anglers, regardless of buying a license in any one given year.

The Economic Benefits of Sportfishing

NEAR THE SANTEE-COOPER LAKES in South Carolina, Strawberry Reservoir in Utah, Lake Okeechobee in Florida, the White River in Arkansas and countless other lakes, rivers and seaside areas across the U.S., there are many communities that depend on the dollars from recreational anglers and related tourism for many of their citizen's livelihoods.

From direct product and service providers such as marinas, fishing guides and tackle shops to the businesses that help anglers enjoy their experience on the water such as restaurants, gas stations and hotels, the \$1,441 spent annually by the average American angler in 2011 supported jobs that generated \$35 billion in salaries and wages. Examine anglers' expenditures and you'll find that over half went to purchase food, lodging, transportation and other travel items. The money spent by companies and employees supporting anglers created an economic multiplier effect with a \$115 billion impact on the nation's economy in 2011.



Economic Contributions by Type of Fishing

	All Fishing	Freshwater	Saltwater	Great Lakes
Anglers	33,111,674	27,059,745	8,888,832	1,664,824
Expenditures/Retail Sales	\$47,697,532,293	\$30,601,946,954	\$13,416,585,025	\$2,971,195,133
Total Multiplier Effect (Economic Output)	\$114,531,945,219	\$73,323,352,261	\$32,279,006,619	\$7,227,424,732
Salaries and Wages	\$35,259,134,752	\$22,195,330,849	\$9,922,342,619	\$2,205,174,067
Jobs	828,133	518,270	243,226	49,298
Contribution to Gross Domestic Product (GDP)	\$61,721,729,003	\$39,202,948,762	\$17,446,689,683	\$3,797,932,801
Federal, State and Local Taxes	\$14,955,905,485	\$9,530,277,934	\$4,242,361,691	\$918,163,495

Top 10 States Ranked by Angler Expenditures

Rank	State	Total Expenditures	Number of Anglers
1.	Florida	\$4,953,493,028	3,091,952
2.	New York	\$2,696,583,564	1,882,280
3.	Michigan	\$2,465,535,795	1,744,206
4.	Minnesota	\$2,440,230,389	1,561,881
5.	California	\$2,393,961,476	1,673,633
6.	Texas	\$2,014,497,308	2,246,367
7.	Ohio	\$1,903,619,503	1,341,657
8.	North Carolina	\$1,655,538,064	1,524,578
9.	Wisconsin	\$1,459,883,024	1,246,775
10.	Virginia	\$1,407,011,422	832,641

Top 10 States: Non-Resident Fishing Destinations Ranked by Number of Visiting Anglers

Rank	State	Number of Non-Resident Anglers	Total Non-Resident Expenditures
1.	Florida	1,197,279	\$898,283,876
2.	Michigan	347,029	\$326,337,857
3.	Wisconsin	336,753	\$445,006,874
4.	North Carolina	328,810	\$260,296,738
5.	Alaska	327,418	\$361,768,322
6.	New York	297,070	\$282,573,249
7.	Oregon	264,424	\$241,771,577
8.	Minnesota	259,324	\$364,108,877
9.	New Jersey	256,950	\$106,323,764
10.	Missouri	244,290	\$205,686,074

*Angler numbers grew
11 PERCENT
since 2006*



U.S. FISHING FACTS

- There are approximately 60 million anglers in the U.S. of which 46 million are estimated to fish in a given year.
- Anglers generate \$48 billion in retail sales.
- Recreational fishing has a \$115 billion impact on the nation's economy.
- Recreational fishing generates \$15 billion in state and federal taxes.
- More than 828,000 jobs are supported through recreational fishing.
- One of every four anglers fishes in saltwater.
- Fishing tackle sales grew over 16 percent in the past five years.
- Since 2006, angler numbers grew 11 percent.



DID YOU KNOW

- Recreational fishing – both fresh and saltwater combined – ranks higher than bowling or playing basketball, softball or soccer, according to data from the National Sporting Goods Association.
- More Americans fish than play golf (21 million) and tennis (13 million) combined.
- If fishing were a company, the amount spent by anglers to support fishing-related retail sales would rank number 51 on the Fortune 500™ list.
- Fishing generated more revenue (\$48 billion) than Lockheed Martin (\$47 billion), Intel (\$44 billion), Chrysler (\$42 billion) or Google (\$38 billion).
- The economic activity generated by sportfishing is greater than the economies, measured in Gross State Product, of 17 states.
- At more than 46 million anglers in 2011, more than twice the number of people fished in 2011 than attended every NFL game combined.

Thank an Angler!

THANK AMERICA'S ANGLERS if you enjoy clean, healthy lakes, rivers and oceans teaming with a dynamic variety of fish and shorebird species, since it's their dollars that provide the bulk of the funding for our nation's fisheries conservation and environmental success.

In fact, you would be hard pressed to find any group of people in the country who contributes more: nearly \$1.5 billion annually. And angler numbers are growing – 11 percent overall in the five years since the last national survey. In fact, accounting for regional variations, some angling demographics actually increased by a larger percentage, including Great Lakes anglers, whose numbers grew by 17 percent and saltwater anglers, whose numbers increased by 15 percent.

This growing legion of anglers is the economic engine that helps keep fisheries conservation moving successfully forward through the purchase of fishing licenses, which go directly toward the operations of state fish and wildlife agencies, and through the federal excise tax on fishing tackle as part of the long-running Sport Fish Restoration and Boating Trust Fund.

License sales in 2010 amounted to \$657 million, while the excise taxes collected on the sale of fishing gear, boats and boat fuel added another \$390 million in support of conservation efforts carried out in each state. It's a model that virtually powers itself.

In addition, anglers donate over \$400 million more each year to various conservation and fishing organizations. Without fish and good habitat, there would be no anglers, and without

anglers – men, women and children – there would be few fish and little quality habitat.

The year 2012 marked the 75th anniversary of our nation's system of conservation funding – a model that is envied throughout the world – that directs excise taxes on fishing and hunting gear toward state-based conservation. The Sport Fish Restoration and Boating Trust Fund has resulted in robust fish and wildlife populations and quality habitat that is the legacy of the sportfishing industry and sportsmen and women alike.



Number of Anglers and Days of Fishing by State in 2011*

	Total Anglers [†]	Non-Resident Anglers	Total Fishing Days ^{††}	Total Non-Resident Fishing Days	Freshwater Anglers	Freshwater Fishing Days	Saltwater Anglers	Saltwater Fishing Days	Great Lakes Anglers	Great Lakes Fishing Days
Alaska	537,927	327,418	4,360,282	1,287,096	301,976	2,995,374	333,747	1,446,457	-	-
Alabama	682,625	209,661	10,878,339	973,788	597,773	9,745,750	133,676	1,490,312	-	-
Arkansas	554,861	96,667	15,661,592	606,738	554,861	15,661,592	-	-	-	-
Arizona	636,966	104,385	4,825,183	684,382	636,966	4,825,183	-	-	-	-
California	1,673,633	97,967	23,753,676	486,605	1,352,402	17,382,021	775,329	7,192,655	-	-
Colorado	767,365	174,817	8,433,019	942,862	767,365	8,433,019	-	-	-	-
Connecticut	341,995	65,349	4,704,820	309,996	243,285	3,518,120	164,864	1,291,469	-	-
Delaware	165,935	106,807	2,051,866	723,793	54,724	654,925	138,392	1,338,609	-	-
Florida	3,091,952	1,197,279	57,593,836	9,543,924	1,214,263	25,729,028	2,397,610	36,347,826	-	-
Georgia	828,869	64,872	8,728,549	272,829	762,738	8,106,020	139,294	727,593	-	-
Hawaii	156,720	53,103	1,881,789	176,750	10,113	84,643	155,126	1,793,516	-	-
Iowa	473,307	57,522	5,977,722	187,449	473,307	5,977,722	-	-	-	-
Idaho	446,718	208,418	5,506,803	3,341,667	446,718	5,506,803	-	-	-	-
Illinois	1,043,780	88,333	13,343,239	396,939	936,501	12,312,455	-	-	69,300	147,545
Indiana	800,749	80,583	20,774,883	536,779	716,309	19,324,014	-	-	26,691	113,863
Kansas	400,291	28,059	4,163,391	74,984	400,291	4,163,391	-	-	-	-
Kentucky	554,163	102,860	10,245,109	859,669	554,163	10,245,109	-	-	-	-
Louisiana	824,949	125,028	18,079,467	493,704	719,933	16,665,476	195,798	1,532,519	-	-
Massachusetts	531,707	154,583	8,367,439	778,903	294,264	4,499,001	323,077	4,048,841	-	-
Maryland	426,065	79,509	4,710,872	550,468	227,210	3,159,998	223,921	1,533,112	-	-
Maine	341,154	148,635	3,873,441	976,016	283,268	3,223,132	133,226	755,746	-	-
Michigan	1,744,206	347,029	28,177,222	2,163,703	1,360,860	20,961,114	-	-	649,639	10,987,320
Minnesota	1,561,881	259,324	21,702,319	1,743,039	1,413,210	20,768,202	-	-	45,578	206,745
Missouri	1,071,487	244,290	14,865,153	1,602,573	1,071,487	14,865,153	-	-	-	-
Mississippi	650,905	50,986	9,175,753	674,787	609,386	7,751,207	120,161	2,293,475	-	-
Montana	267,213	82,129	2,449,880	358,495	267,213	2,449,880	-	-	-	-
North Carolina	1,524,578	328,810	23,471,581	1,532,266	1,053,713	15,763,631	632,341	4,503,751	-	-
North Dakota**	-	-	-	-	-	-	-	-	-	-
Nebraska	206,967	30,209	2,594,636	102,110	206,967	2,594,636	-	-	-	-
New Hampshire	228,087	75,412	4,369,752	499,357	208,913	3,606,384	49,171	730,144	-	-
New Jersey	766,085	256,950	9,454,230	1,367,089	258,108	2,679,638	603,966	7,019,976	-	-
New Mexico	278,016	65,264	3,899,329	277,548	278,016	3,899,329	-	-	-	-
Nevada	146,541	32,139	1,400,222	104,879	146,541	1,400,222	-	-	-	-
New York	1,882,280	297,070	29,874,128	2,070,604	1,212,213	19,199,694	800,811	7,683,521	331,774	4,484,574
Ohio	1,341,657	84,998	16,873,802	609,419	1,160,578	14,039,907	-	-	343,626	2,160,773
Oklahoma	729,191	49,102	8,499,045	555,566	729,191	8,499,045	-	-	-	-
Oregon	637,746	264,424	5,658,437	1,262,784	516,149	5,201,489	176,521	607,738	-	-
Pennsylvania	1,101,173	210,020	10,136,323	1,772,198	874,082	8,906,314	-	-	119,742	387,356
Rhode Island	174,882	96,061	2,079,990	500,635	41,983	738,755	151,138	1,430,260	-	-
South Carolina	743,818	182,404	11,188,820	702,047	537,136	9,221,130	305,063	2,318,090	-	-
South Dakota	267,862	111,687	4,068,780	543,548	267,862	4,068,780	-	-	-	-
Tennessee	826,293	116,875	16,956,832	915,811	826,293	16,956,832	-	-	-	-
Texas	2,246,367	113,748	30,667,265	1,095,014	1,757,691	22,616,480	750,759	8,157,241	-	-
Utah	413,568	70,130	5,979,364	606,114	413,568	5,979,364	-	-	-	-
Virginia	832,641	184,089	10,520,649	1,153,474	551,316	7,903,627	428,584	2,771,687	-	-
Vermont	207,014	112,395	2,215,244	463,883	207,014	2,215,244	-	-	-	-
Washington	938,053	102,562	13,448,784	341,327	743,336	10,939,821	401,377	2,699,664	-	-
Wisconsin	1,246,775	336,753	21,283,610	6,707,662	1,106,738	19,950,280	-	-	178,268	1,246,411
West Virginia	305,122	83,501	4,521,064	249,664	305,122	4,521,064	-	-	-	-
Wyoming	302,758	193,076	5,340,231	3,331,254	302,758	5,340,231	-	-	-	-
United States	33,111,674	6,963,989	553,841,086	57,528,963	27,059,745	443,222,665	8,888,832	99,473,902	1,664,824	19,660,829

* These numbers only report the number of anglers 16 years and older. Detailed data were not available for anglers 6–15 years of age. ** North Dakota has expressed concerns regarding their estimated number of anglers. Please refer to license data for alternate estimates. † Includes resident and non-resident anglers. †† Includes resident and non-resident fishing days. Source: 2011 National Survey of Fishing, Hunting and Wildlife-Associated Recreation, U.S. Fish and Wildlife Service.

Economic Impact of Sportfishing by State, All Types of Fishing in 2011

	Retail Sales	Total Multiplier or Ripple Effect	Salaries and Wages	Jobs	Federal Tax Revenues	State and Local Tax Revenues
Alaska [†]	\$718,452,401	\$1,073,716,980	\$358,679,292	9,992	\$73,987,017	\$86,459,590
Alabama	\$736,194,840	\$1,103,378,857	\$320,214,191	10,489	\$70,240,159	\$61,184,997
Arkansas	\$517,364,731	\$740,783,174	\$232,560,542	7,801	\$51,806,775	\$50,109,458
Arizona	\$893,418,656	\$1,514,085,259	\$490,946,268	12,505	\$108,821,355	\$89,281,673
California	\$2,393,961,476	\$4,580,356,969	\$1,573,094,107	35,748	\$365,552,269	\$334,401,009
Colorado	\$857,405,955	\$1,350,633,849	\$430,026,121	10,338	\$102,804,411	\$83,185,649
Connecticut	\$446,137,179	\$762,966,357	\$273,332,655	6,625	\$68,287,470	\$53,723,252
Delaware	\$109,167,791	\$149,140,677	\$42,741,504	1,319	\$11,259,350	\$11,951,595
Florida	\$4,953,493,028	\$8,663,464,085	\$2,702,670,214	80,211	\$685,323,663	\$516,516,023
Georgia	\$1,306,650,305	\$2,104,417,872	\$622,480,242	15,644	\$147,791,801	\$109,281,377
Hawaii	\$239,713,712	\$331,199,373	\$106,579,841	3,007	\$21,788,329	\$22,394,047
Iowa	\$330,071,230	\$486,330,879	\$146,685,016	4,574	\$33,646,934	\$29,792,679
Idaho	\$548,392,876	\$756,524,527	\$229,664,505	7,252	\$54,084,065	\$49,541,983
Illinois	\$1,020,000,407	\$1,731,374,441	\$548,144,825	13,548	\$136,903,628	\$118,506,781
Indiana	\$693,739,202	\$1,056,572,919	\$325,000,798	10,293	\$78,919,648	\$76,365,973
Kansas	\$224,448,862	\$321,315,860	\$103,609,537	3,131	\$24,807,182	\$21,997,805
Kentucky	\$862,888,495	\$1,254,442,696	\$361,029,199	12,059	\$82,294,089	\$69,516,147
Louisiana	\$958,784,822	\$1,452,463,864	\$453,441,513	13,265	\$93,009,897	\$93,390,154
Massachusetts	\$475,486,261	\$829,874,861	\$303,259,366	7,213	\$72,009,674	\$55,746,533
Maryland	\$549,436,134	\$844,266,915	\$258,791,438	6,209	\$61,010,190	\$51,680,339
Maine	\$395,692,015	\$614,401,445	\$201,165,974	6,723	\$44,501,743	\$42,878,034
Michigan	\$2,465,535,795	\$4,270,036,038	\$1,447,918,090	37,989	\$335,597,718	\$287,082,977
Minnesota	\$2,440,230,389	\$4,199,672,948	\$1,311,490,021	35,462	\$319,557,705	\$264,335,621
Missouri	\$692,954,973	\$1,126,041,058	\$361,357,550	10,842	\$84,547,273	\$73,509,816
Mississippi	\$902,096,726	\$1,242,395,964	\$349,050,297	11,073	\$73,449,699	\$74,823,920
Montana	\$349,913,031	\$499,332,328	\$147,910,383	5,375	\$38,361,371	\$36,895,735
North Carolina	\$1,655,538,064	\$2,710,255,374	\$899,667,215	25,712	\$203,218,395	\$177,290,388
North Dakota ^{††}	\$74,100,683	\$105,958,178	\$34,859,486	1,210	\$7,626,233	\$9,436,565
Nebraska	\$217,640,644	\$335,635,429	\$106,275,569	3,230	\$23,561,091	\$21,225,298
New Hampshire	\$210,095,175	\$332,818,486	\$114,048,866	3,614	\$27,758,574	\$23,905,031
New Jersey	\$1,146,551,669	\$1,866,013,788	\$583,147,807	15,386	\$158,769,630	\$137,228,333
New Mexico	\$433,283,763	\$607,518,472	\$186,044,225	5,487	\$40,433,851	\$42,284,888
Nevada	\$189,689,911	\$279,450,004	\$92,700,327	2,268	\$21,025,417	\$16,507,952
New York	\$2,696,583,564	\$4,475,253,164	\$1,526,230,881	32,317	\$356,339,771	\$332,964,752
Ohio	\$1,903,619,503	\$2,925,344,790	\$789,311,723	26,354	\$208,530,370	\$203,191,366
Oklahoma	\$821,069,868	\$1,161,687,253	\$301,144,447	11,342	\$84,503,409	\$77,341,322
Oregon	\$680,636,132	\$1,172,481,577	\$382,802,979	11,043	\$91,781,493	\$72,381,359
Pennsylvania	\$502,996,175	\$853,281,964	\$303,917,251	9,587	\$72,812,786	\$59,880,258
Rhode Island	\$135,428,891	\$207,341,447	\$73,301,720	2,056	\$17,264,447	\$15,484,543
South Carolina	\$865,561,873	\$1,328,324,440	\$431,065,953	19,994	\$104,618,601	\$74,244,785
South Dakota	\$313,888,605	\$421,892,121	\$126,326,966	3,747	\$28,801,493	\$25,108,727
Tennessee	\$1,279,223,286	\$2,051,674,603	\$690,098,985	17,542	\$149,376,195	\$112,094,480
Texas	\$2,014,497,308	\$3,608,911,137	\$1,144,653,689	29,824	\$260,143,658	\$195,917,234
Utah	\$489,764,385	\$799,945,482	\$253,475,908	7,207	\$56,338,487	\$49,702,967
Virginia	\$1,407,011,422	\$2,138,776,268	\$642,302,699	18,672	\$164,573,465	\$139,406,127
Vermont	\$147,111,097	\$225,001,690	\$73,224,447	2,420	\$17,139,314	\$15,966,003
Washington	\$1,186,275,897	\$1,956,335,653	\$625,222,636	16,211	\$150,271,880	\$119,631,627
Wisconsin	\$1,459,883,024	\$2,267,459,700	\$667,112,559	21,542	\$166,477,700	\$148,668,219
West Virginia	\$448,099,697	\$626,474,347	\$199,013,407	7,208	\$45,426,838	\$45,289,085
Wyoming	\$476,766,960	\$664,347,694	\$238,166,287	9,008	\$54,828,250	\$28,364,285
United States^{†††}	\$47,697,532,293	\$114,531,945,219	\$35,259,134,752	828,133	\$8,224,085,681	\$6,731,819,804

[†] The Alaska Department of Fish and Game (ADFG) has expressed concern regarding the expenditure estimates from the USFWS National Survey. Readers may wish to defer to economic statistics produced by the ADFG. ^{††} North Dakota has expressed concerns regarding their estimated number of anglers. Please refer to license data for alternate estimates. [†] Includes resident and non-resident anglers. ^{†††} The sum of the states is about one percent less than the U.S. total. The difference comes from anglers unable to assign some expenditures to any specific state. For example, an online purchase that is then used in multiple states.

Economic Impact of Freshwater Fishing by State in 2011

	Retail Sales	Total Multiplier or Ripple Effect	Salaries and Wages	Jobs	Federal Tax Revenues	State and Local Tax Revenues
Alaska [†]	\$390,455,542	\$580,993,450	\$188,878,215	5,261	\$38,988,480	\$48,168,228
Alabama	\$514,154,996	\$776,012,671	\$231,866,667	7,845	\$51,356,071	\$47,232,865
Arkansas	\$507,855,831	\$725,249,570	\$222,334,267	7,549	\$49,830,096	\$49,462,412
Arizona	\$862,298,181	\$1,456,854,992	\$464,810,603	12,007	\$103,458,290	\$86,916,175
California	\$1,417,629,003	\$2,704,701,141	\$921,946,336	21,515	\$213,770,199	\$198,127,762
Colorado	\$836,049,866	\$1,314,006,542	\$408,940,231	9,942	\$98,445,119	\$81,477,253
Connecticut	\$168,308,427	\$285,969,244	\$101,365,735	2,437	\$25,817,247	\$22,305,922
Delaware	\$12,759,486	\$18,206,232	\$6,146,028	173	\$1,366,397	\$1,347,706
Florida	\$977,018,002	\$1,689,575,866	\$520,689,055	14,040	\$129,932,870	\$97,608,385
Georgia	\$993,650,535	\$1,607,081,758	\$487,200,968	12,536	\$116,498,117	\$87,783,143
Hawaii	\$22,549,618	\$26,394,773	\$7,654,418	202	\$1,555,053	\$1,511,733
Iowa	\$323,260,844	\$475,156,512	\$140,198,334	4,427	\$32,357,375	\$29,249,470
Idaho	\$515,737,238	\$705,277,170	\$198,543,657	6,556	\$47,820,014	\$47,230,834
Illinois	\$933,451,515	\$1,572,737,782	\$489,634,660	12,359	\$123,703,047	\$108,596,388
Indiana	\$663,443,749	\$1,008,810,558	\$305,769,530	9,805	\$74,639,593	\$73,766,433
Kansas	\$217,603,874	\$310,007,835	\$96,152,266	2,949	\$23,345,989	\$21,514,041
Kentucky	\$854,326,602	\$1,240,022,840	\$351,612,169	11,852	\$80,542,340	\$68,902,310
Louisiana	\$603,081,322	\$912,819,899	\$286,114,887	8,363	\$58,543,402	\$58,539,594
Massachusetts	\$146,228,713	\$248,215,828	\$86,510,958	2,127	\$21,027,310	\$17,769,876
Maryland	\$406,854,404	\$609,146,140	\$175,756,757	4,020	\$41,246,734	\$34,308,875
Maine	\$273,456,161	\$423,408,882	\$133,834,888	4,530	\$29,995,120	\$30,603,293
Michigan	\$1,141,036,276	\$1,940,341,027	\$619,087,513	17,156	\$151,007,274	\$139,166,532
Minnesota	\$2,320,146,413	\$3,979,217,295	\$1,221,563,596	33,209	\$298,670,300	\$250,000,060
Missouri	\$669,761,464	\$1,085,076,122	\$340,945,086	10,344	\$80,313,790	\$71,249,964
Mississippi	\$458,656,309	\$628,772,461	\$176,510,964	5,637	\$37,179,379	\$38,483,041
Montana	\$304,116,923	\$429,227,798	\$121,015,027	4,550	\$31,965,362	\$31,747,501
North Carolina	\$749,934,465	\$1,217,456,822	\$401,839,252	11,193	\$90,604,288	\$80,734,150
North Dakota ^{††}	\$72,738,103	\$103,821,939	\$33,397,440	1,172	\$7,332,526	\$9,298,340
Nebraska	\$210,607,924	\$323,918,163	\$100,219,885	3,076	\$22,334,717	\$20,600,233
New Hampshire	\$111,642,050	\$176,596,227	\$59,201,639	2,107	\$14,556,731	\$13,038,996
New Jersey	\$262,822,407	\$408,936,065	\$115,583,385	3,241	\$34,755,733	\$32,470,409
New Mexico	\$424,936,372	\$594,033,549	\$177,278,250	5,302	\$38,739,719	\$41,732,726
Nevada	\$182,050,470	\$266,826,141	\$85,889,466	2,152	\$19,585,371	\$15,930,980
New York	\$839,301,301	\$1,391,576,734	\$458,897,320	9,296	\$109,158,992	\$108,124,836
Ohio	\$1,391,620,187	\$2,119,747,271	\$557,269,663	18,811	\$149,620,126	\$148,527,683
Oklahoma	\$807,515,605	\$1,139,429,364	\$289,927,606	11,087	\$82,215,304	\$76,125,399
Oregon	\$500,852,664	\$869,271,534	\$275,042,949	8,324	\$66,820,783	\$53,955,770
Pennsylvania	\$416,652,083	\$699,865,663	\$242,733,277	8,037	\$58,514,838	\$49,157,022
Rhode Island	\$25,085,633	\$36,474,752	\$12,371,219	353	\$2,940,532	\$2,761,925
South Carolina	\$586,834,001	\$897,282,708	\$290,463,989	9,147	\$71,195,126	\$52,216,395
South Dakota	\$306,541,212	\$410,560,590	\$118,778,351	3,558	\$27,307,291	\$24,780,875
Tennessee	\$1,260,605,320	\$2,016,625,907	\$668,289,864	17,075	\$145,112,186	\$111,056,978
Texas	\$851,982,068	\$1,523,351,447	\$473,541,236	12,363	\$109,709,319	\$87,191,653
Utah	\$473,976,891	\$771,520,958	\$239,040,209	6,858	\$53,393,817	\$48,109,528
Virginia	\$864,064,448	\$1,295,588,707	\$385,885,573	11,496	\$101,313,898	\$86,658,382
Vermont	\$143,159,827	\$218,407,554	\$69,206,280	2,334	\$16,321,636	\$15,667,826
Washington	\$795,510,532	\$1,305,274,510	\$404,765,504	10,617	\$97,314,507	\$79,136,421
Wisconsin	\$1,302,884,529	\$2,005,402,272	\$565,658,587	18,696	\$143,422,987	\$132,312,905
West Virginia	\$442,571,467	\$617,811,663	\$193,105,034	7,063	\$44,293,906	\$44,918,702
Wyoming	\$458,137,962	\$637,595,532	\$219,406,253	8,623	\$50,788,226	\$27,681,561
United States^{†††}	\$30,601,946,954	\$73,323,352,261	\$22,195,330,849	518,270	\$5,203,555,134	\$4,326,722,800

[†] The Alaska Department of Fish and Game (ADFG) has expressed concern regarding the expenditure estimates from the USFWS National Survey. Readers may wish to defer to economic statistics produced by the ADFG. ^{††} North Dakota has expressed concerns regarding their estimated number of anglers. Please refer to license data for alternate estimates. [†] Includes resident and non-resident anglers. ^{†††} Small sample size (N = 10 to 30). Use results with caution.

Economic Impact of Saltwater Fishing by State in 2011

	Retail Sales	Total Multiplier or Ripple Effect	Salaries and Wages	Jobs	Federal Tax Revenues	State and Local Tax Revenues
Alaska [†]	\$311,177,096	\$466,252,320	\$152,337,216	4,433	\$31,697,538	\$37,115,124
Alabama	\$214,726,406	\$315,069,227	\$80,304,577	2,469	\$17,369,339	\$13,487,212
California	\$912,235,607	\$1,747,276,278	\$577,058,036	13,118	\$136,555,869	\$129,364,106
Connecticut	\$271,891,817	\$466,370,051	\$165,692,344	4,098	\$41,070,915	\$30,924,256
Delaware	\$94,590,653	\$127,988,831	\$34,608,759	1,108	\$9,515,007	\$10,475,916
Florida	\$3,929,115,544	\$6,882,928,390	\$2,128,186,840	65,212	\$544,013,771	\$416,193,512
Georgia	\$305,666,072	\$483,602,702	\$126,750,273	2,916	\$29,633,102	\$20,969,298
Hawaii	\$216,771,862	\$304,176,449	\$98,508,995	2,799	\$20,158,621	\$20,855,905
Louisiana	\$347,327,388	\$525,289,616	\$158,364,227	4,715	\$32,886,617	\$34,333,181
Massachusetts	\$318,845,787	\$562,140,196	\$204,708,079	4,883	\$48,461,966	\$36,975,236
Maryland	\$133,088,741	\$218,824,482	\$74,609,468	2,017	\$17,929,654	\$16,321,873
Maine	\$114,313,954	\$177,376,020	\$58,820,997	1,998	\$12,846,727	\$11,623,291
Mississippi	\$432,212,327	\$595,877,028	\$162,505,447	5,179	\$34,355,118	\$35,410,551
North Carolina	\$893,331,115	\$1,470,948,574	\$484,129,047	14,242	\$109,926,749	\$95,589,405
New Hampshire	\$94,020,755	\$148,441,418	\$49,740,602	1,404	\$12,128,037	\$10,585,712
New Jersey	\$877,537,326	\$1,445,381,080	\$460,135,873	12,031	\$122,387,262	\$104,220,972
New York	\$1,194,493,042	\$1,964,723,139	\$668,641,794	15,371	\$156,054,231	\$144,539,079
Oregon	\$159,652,843	\$266,684,168	\$85,095,404	2,281	\$20,211,625	\$16,519,806
Rhode Island	\$108,549,235	\$167,786,994	\$58,942,571	1,670	\$13,901,720	\$12,589,140
South Carolina	\$268,108,559	\$413,203,002	\$131,247,177	10,615	\$31,432,323	\$21,173,825
Texas	\$1,134,814,020	\$2,032,731,533	\$639,017,620	16,819	\$144,213,917	\$107,129,706
Virginia	\$531,253,307	\$823,163,178	\$244,056,471	6,944	\$60,725,533	\$51,846,802
Washington	\$359,774,539	\$594,762,381	\$185,140,688	4,966	\$45,412,088	\$38,873,569
United States^{††}	\$13,416,585,025	\$32,279,006,619	\$9,922,342,619	243,226	\$2,320,704,050	\$1,921,657,641

[†] The Alaska Department of Fish and Game (ADFG) has expressed concern regarding the expenditure estimates from the USFWS National Survey. Readers may wish to defer to economic statistics produced by the ADFG.

^{††} Small sample size (N = 10 to 30). Use results with caution.

^{†††} Includes impacts from purchases made in inland states for saltwater fishing.

Economic Impact of Great Lakes Fishing by State in 2011

	Retail Sales	Total Multiplier or Ripple Effect	Salaries and Wages	Jobs	Federal Tax Revenues	State and Local Tax Revenues
Illinois [†]	\$58,496,056	\$105,389,187	\$34,388,935	786	\$7,937,752	\$6,632,357
Indiana [†]	\$18,918,669	\$27,872,459	\$7,114,508	213	\$1,848,465	\$1,677,907
Michigan	\$1,272,352,928	\$2,231,549,094	\$774,938,502	19,805	\$173,310,482	\$142,872,247
Minnesota [†]	\$85,158,787	\$154,284,123	\$51,378,186	1,494	\$12,731,265	\$11,031,513
New York	\$612,789,066	\$1,029,998,139	\$340,811,049	6,787	\$79,185,366	\$74,954,828
Ohio	\$486,482,882	\$759,942,999	\$207,718,420	7,048	\$54,068,658	\$52,021,856
Pennsylvania [†]	\$55,208,013	\$95,433,266	\$31,861,877	891	\$7,925,634	\$7,315,635
Wisconsin	\$114,344,635	\$185,460,010	\$56,867,409	1,883	\$13,810,484	\$12,540,282
United States^{††}	\$2,971,195,133	\$7,227,424,732	\$2,205,174,067	49,298	\$509,320,381	\$408,843,114

[†] Small sample size (N = 10 to 30). Use results with caution.

^{††} Includes impacts from purchases made in inland states for Great Lakes fishing.

U.S. Angler Expenditures by Category in 2011

	All Anglers	Non-Residents
Travel Expenditures	\$21,789,464,736	\$5,046,171,594
Food	\$5,435,208,401	\$1,167,075,187
Lodging	\$2,276,110,085	\$948,887,420
Airfare	\$622,043,680	\$306,590,480
Public transportation	\$181,726,928	\$152,377,596
Private transportation	\$5,457,765,693	\$1,106,909,980
Boat fuel	\$2,209,006,533	\$232,069,910
Guides	\$1,102,375,347	\$628,563,276
Public land use fees	\$237,886,684	\$24,443,922
Private land use fees	\$243,705,059	\$39,845,900
Boat launching	\$159,626,613	\$12,984,120
Boat mooring	\$1,447,185,966	\$81,558,389
Equipment rental	\$245,547,365	\$78,882,616
Bait (live, cut, prepared)	\$1,497,444,900	\$155,960,368
Ice	\$509,494,150	\$91,775,505
Heating and cooking fuel	\$164,337,331	\$18,246,927
Fishing Equipment Expenditures	\$6,141,895,285	\$625,615,511
Rods, reels and components	\$2,366,773,897	\$308,271,684
Lines and leaders	\$593,397,572	\$63,736,755
Lures, flies and artificial bait	\$1,169,092,498	\$105,364,698
Hooks, sinkers and other terminal tackle	\$628,600,283	\$44,797,654
Tackle boxes	\$141,788,645	\$6,698,559
Creels, stringers and landing nets	\$131,514,992	\$8,067,437
Bait buckets and minnow traps	\$81,007,729	\$2,844,077
Depth finder, fish finders and other electronics	\$469,849,315	\$50,772,714
Ice fishing equipment	\$241,328,298	\$6,238,598
Other fishing equipment	\$318,542,055	\$28,823,336
Auxiliary Purchases for Fishing	\$1,014,370,726	\$97,843,446
Camping gear	\$483,399,663	\$25,446,307
Binoculars	\$107,278,051	\$21,511,474
Special fishing clothing and foul weather gear	\$423,693,011	\$50,885,665
Special Equipment Purchased for Fishing	\$13,683,810,379	\$1,077,927,233
Bass boats	\$1,037,787,838	\$2,549,720
Other motorized boats	\$2,453,520,343	\$348,601,670
Canoes and non-motorized boats	\$202,356,326	\$8,777,092
Boat motors, trailers and hitches	\$1,219,780,914	\$367,972,106
Pick-ups, campers and motor homes	\$7,070,365,952	\$342,572,041
Cabins	\$370,332,556	\$841,730
4x4 and off-road vehicles	\$1,141,003,365	\$1,569,724
Other special equipment	\$188,663,084	\$5,043,150
Other Miscellaneous Fishing Expenses	\$5,067,991,167	\$886,524,370
Taxidermy and processing	\$96,356,764	\$15,510,372
Books and magazines	\$156,328,178	\$14,440,416
Dues and contributions	\$403,431,618	\$35,088,538
Fishing licenses	\$630,986,633	\$168,739,291
Tags, permits and other special licenses	\$76,818,548	\$10,567,576
Land purchased for fishing	\$3,143,920,672	\$302,709,448
Land leased for fishing	\$298,322,266	\$122,813,926
Other miscellaneous fishing expenditures	\$261,826,488	\$216,654,803
TOTAL	\$47,697,532,293	\$7,734,082,154

The American Sportfishing Association (ASA) is the sportfishing industry's trade association committed to representing the interests of the entire sportfishing community. We give the industry a unified voice, speaking out on behalf of sportfishing and boating industries, state and federal natural resource agencies, conservation organizations, angler advocacy groups and outdoor journalists when emerging laws and policies could significantly affect sportfishing business or sportfishing itself. ASA invests in long-term ventures to ensure the industry will remain strong and prosperous, as well as safeguard and promote the enduring social, economic and conservation values of sportfishing in America. ASA also gives America's 60 million anglers a voice in policy decisions that affect their ability to sustainably fish on our nation's waterways through KeepAmericaFishing™, our angler advocacy campaign. ASA also represents the interests of America's nearly 60 million anglers who generated \$48 billion in retail sales with a \$115 billion impact on the nation's economy creating employment for more than 828,000 people in 2011.

This publication was funded by Multistate Conservation Grant VA F12AP00137, VA M-26-R awarded by the Wildlife and Sport Fish Restoration Programs of the U.S. Fish and Wildlife Service, jointly managed with the Association of Fish and Wildlife Agencies.



AMERICAN SPORTFISHING ASSOCIATION

1001 North Fairfax Street, Suite 501, Alexandria VA 22314. www.ASAfishing.org.

QUESTIONS AND INQUIRIES

Rob Southwick, Southwick Associates, rob@southwickassociates.com

RESEARCH, AUTHORSHIP AND EDITING

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PHOTO CREDITS

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REPORT CITATION

Southwick Associates. *Sportfishing in America: An Economic Force for Conservation*. Produced for the American Sportfishing Association (ASA) under a U.S. Fish and Wildlife Service (USFWS) Sport Fish Restoration grant (F12AP00137, VA M-26-R) awarded by the Association of Fish and Wildlife Agencies (AFWA), 2012.

Data sources for "U.S. Fishing Facts" and "Quick Fishing Facts:" U.S. Department of the Interior, U.S. Department of Commerce, *Fortune* magazine, National Sporting Goods Association, ESPN and Southwick Associates.

Methodology: Data were obtained from the U.S. Fish and Wildlife Service's 2011 *National Survey of Fishing, Hunting and Wildlife-Associated Recreation*. Impacts were developed using the IMPLAN from MIG, Inc. of Stillwater, Minn.

Special notes include:

- For some expenditures, the state where the purchase was made was not identified. These were assigned to the angler's state of residence.
- The estimates of anglers and angler days do not exactly match numbers reported by the USFWS. The sum of the state-level numbers are reported here, whereas the USFWS calculated a single number at the national level. Either method is appropriate.
- The expenditures reported here may be higher than those reported by the USFWS. This is due to expenditures made by an individual for both fishing and hunting. In such cases, the USFWS reports these separately and not part of their fishing-only estimates. In this report, such expenditures are pro-rated into hunting and fishing portions based on the individual's total days of hunting and fishing, and then assigned to each activity as appropriate. Using either approach, the USFWS's or the method used here, the results are accurate and acceptable.
- The results can be combined with the hunting impacts reported in the hunting economics publication from the National Shooting Sports Foundation to gain a comprehensive picture of the returns from all sportsmen and women.

To Share What Is Ours

The 75th Anniversary of the Wildlife and Sport Fish Restoration (WSFR) program is an opportune time for the hunting and angling conservation community to refocus, redefine, and reclaim the story of conservation that is ours. The WSFR program's contributions often go unnoticed by the general public in part due to a lack of understanding of the multitude of public benefits it reaps. In order to foster greater understanding for the benefits recreational hunting, angling, and shooting have for our society, we should strive to **define the WSFR program as the American System of Conservation Funding – a user pays-public benefits program.**

75 years ago, the conservation community, consisting largely of hunters, anglers, recreational shooters, and related industries, supported the use of funds from an excise tax on firearms and ammunition –along with the dedicated revenue from hunting and fishing licenses –to be used exclusively by state fish and wildlife agencies to professionally manage fish and wildlife populations and provide access for sportsmen and the larger public to enjoy the benefits of this management. This funding mechanism was eventually expanded to include the fishing and boating communities as well as the archery community. Accordingly, these groups produced the **American System of Conservation Funding**; a unique “**user pays-public benefits**” approach. This **user-pays** funding strategy has produced numerous **public benefits** including: abundant fish and wildlife populations, access to public lands and clean waters, improved fish and wildlife habitat, carbon sequestration, wetland protection and its associated water filtration and flood retention functions, improved soil and water conservation, shooting ranges, and boating access facilities that are available for the enjoyment of the entirety of the American public – hunters and non-hunters alike.

The definition of conservation is the key to highlighting the importance of hunters, anglers, boaters, and shooters to the American System of Conservation Funding. The popularization of the term conservation can be traced back to Gifford Pinchot of the U.S. Forest Service. Pinchot defined conservation as the “wise use of the Earth and its resources for the lasting good of men.” Without the inclusion of resource use and management, these recreational user groups are just that – users of the resources. This is not the case. We are more than occasional users of these natural resources. **We are committed to the stewardship of these resources. We are the original conservationists, in our spirit and in our deeds.**

With the 75th Anniversary of the WSFR program this year, we are presented with the opportunity to more accurately portray ourselves as providers of public benefits that far exceed our own personal benefit. State, federal, and tribal natural resource management agencies and the conservation community need to develop and implement messaging and marketing strategies to broadly expand understanding of the historic and current roles of this community in fish and wildlife conservation. A primary focus must be to enhance recognition that a subset of users – recreational hunters, anglers, boaters, and shooters - largely foot the bill for programs that help deliver abundant fish and wildlife, clean water, healthy landscapes, and access to these resources that are enjoyed by the public at large.

In a time of changing social and economic dynamics, we cannot afford to sell ourselves short and should consistently use language that enhances public understanding of the scope of our commitment and accomplishments. We need to dispel the misconception that hunters and anglers pay for programs that benefit only game fish and game wildlife populations. Words matter. Current terminology **describing our scheme of conservation funding as “user pays-user benefits” is both inaccurate and counter-productive**. In order to refocus, redefine, and reclaim our conservation legacy, we must change our own terminology by describing the **WSFR program as the American System of Conservation Funding, which is a “user pays-public benefits” entity**, in order to more accurately characterize our contributions and to promote comprehension of the importance of our sporting heritage to conservation efforts of both past and future generations.



Ed DeWitt
Executive Director

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June 27, 2013

Betsy Nicholson
Federal Co-Lead for Northeast Regional Ocean Planning
NOAA Ocean Service
Northeast Regional Office
55 Great Republic Drive
Gloucester, MA 01930-2276

RE: Northeast Regional Planning Body Draft Regional Ocean Planning Goals

Dear Ms. Nicholson:

The Association to Preserve Cape Cod (APCC) submits this letter as part of the public comment for the Northeast Regional Planning Body's Draft Regional Ocean Planning Goals.

Founded in 1968, APCC is the Cape's leading nonprofit environmental advocacy and education organization, working for the adoption of laws, policies and programs that protect and enhance Cape Cod's natural resources and quality of life. APCC is a member-based organization supported by over 5,000 members across the entire Cape Cod region.

A primary focus of APCC's mission is to help ensure the protection of the region's coastal and ocean resources. A significant percentage of this effort includes working with local, regional, state and federal partners to restore the Cape's coastal resources and ecosystems, which are a keystone in the Cape's coastal economy. APCC believes strongly that coastal resources have a direct and critical relationship to ocean ecosystem health, and are also closely linked to the economic viability of the commercial fishing industry and the coastal-ocean economy.

In its current draft form, the Regional Ocean Planning Goals fall short in acknowledging the inseparable connection between ocean resources and key coastal resources such as estuaries, coastal salt marshes and migratory fish runs and spawning habitat. This unrealistic partition fails to take into account the effects of coastal activities on the ocean, and will only lead to an incomplete and ineffective ocean plan.

For example, properly functioning salt marshes are an integral piece of the nearshore coastal zone, but are also essential for the health of ocean resources. Seventy-five percent of the fish species that are important to our region's commercial fisheries rely

on salt marshes as habitat for spawning, protective nursery or a source of food. Salt marshes also remove a significant portion of nutrients and other pollutants, which would otherwise enter the ocean, thereby protecting ocean resources from the effects of these pollutants.

Another example of the inextricable linkage between coastal and ocean resources are diadromous fish such as river herring and American eels. At different stages in their life cycles, these fish rely upon both coastal and ocean ecosystems for their survival. Improving their habitat in the coastal zone (e.g., restoring fish runs and spawning habitat for river herring and other diadromous fish species) helps to sustain and increase populations of these species in the ocean. Herring are a critical food source for many commercially important marine finfish and also play a key role in the coastal food web. Restoration activities in the coastal zone help to ensure that declining herring populations will recover, and in turn will help sustain ocean-based populations of commercial fish species.

A third example of how coastal activities impact ocean ecosystems is poor water quality caused by land-based pollutants, such as stormwater runoff and nutrient loading from septic systems. These pollutants negatively impact coastal ecosystems as well as the ocean resources that the Northeast Regional Planning Body has identified as important, including environmental, economic, cultural and recreational resources.

Because of the integral connection between coastal resources and ocean resources, APCC recommends that coastal resources—and efforts to protect, restore and improve them—be incorporated into a truly comprehensive set of Regional Ocean Planning Goals. Acknowledging the relationship between coastal and ocean resources in the set of goals will help guide creation and implementation of a more effective plan for our ocean resources.

APCC thanks the Northeast Regional Planning Body for this opportunity to comment.

Sincerely,



Ed DeWitt
Executive Director



ATLANTIC OFFSHORE LOBSTERMEN'S ASSOCIATION

54 Chafham Drive Bedford New Hampshire 03110
office 603.206.5468 fax 603.666.5601 offshorelobster.org

June 25, 2013

Ms. Betsy Nicholson
Federal co-lead for Northeast Regional Ocean Planning
NOAA Ocean Service
Northeast Regional Office
55 Great Republic Drive
Gloucester, MA 01920-2276

Dear Ms. Nicholson,

I'm writing on behalf of the Atlantic Offshore Lobstermen's Association (AOLA) regarding the Northeast Regional Planning Body's request for comments related to the document "Draft Goals for Northeast Regional Ocean Planning". Please see our comments below, relative to the three goals outlined in the draft goals document: 1) Effective Decision Making; 2) Healthy Ocean and Coastal Ecosystems; and 3) Compatibility among Past, Current, and Future Ocean Uses.

Effective Decision Making

Decisions relative to ocean zoning, access to ocean resources, and how various stakeholders interact with one another, need to be based on comprehensive regional plans that are transparent, engage all stakeholders, are based on the best available data, and provide assurances that fishing rights will not be lost.

As it stands, the projects that have been brought forth to date (i.e. sustainable energy, ocean observatories, etc.) suffer from a lack of data relative to the impacts on the ecosystem, fisheries resources, fishing industry, regional economies, and cultural heritage. While we support the intention of some of these efforts, we have serious concerns that these projects are being green lighted and fast tracked without fully addressing how the construction or operation of these installations will affect habitat; fish, invertebrate, and marine mammal behavior (migration patterns, mating and reproduction, etc.); oceanographic conditions; and fishing economics.

Before ocean zones are defined, and *certainly* before any structure is cited, baseline environmental data MUST be collected and there MUST be coordinated and comprehensive protocols in place to monitor the impacts of these projects. Companies bidding to construct these projects must work with fisheries managers, biologists, and the fishing industry to put the proper data, monitoring, notification, and liability programs in place.

Healthy Ocean and Coastal Ecosystems

We believe this goal, as outlined in the document is laudable, however we again worry that all of the necessary data is not available to identify areas of regional importance, especially in light of changing ocean conditions relative to climate change. Charts and maps developed as part of the regional planning process MUST clearly state all data deficiencies. We recommend that a key action of the Northeast Regional Ocean Planning Body be to identify research and data gathering needs. We support the Healthy Ocean and Coastal Ecosystems potential actions listed as numbers 5 and 6 in the draft goals document.

Compatibility among Past, Current, and Future Ocean Uses

Many factors are changing how the ocean is used, by whom, and where they operate. While we understand the desire for non-fishing interests to access the ocean and ocean resources, we have serious concerns about user conflicts and recommend that the planning body focus much attention on conflict avoidance. These concerns apply to both inter-sector conflicts (e.g. energy versus fishing) as well as conflicts among different fishing sectors, fisheries research efforts, and gear types as fleets move in response to management and shifting fishing populations, and are displaced by other ocean uses. Potential conflicts need to be considered up front, during the planning phases of industrial projects, research endeavors, and fisheries management decisions. Having a regional body that establishes protocols regarding stakeholder notification, coordination, communication and interaction is vital.

As additional uses for ocean resources are developed we MUST keep in mind that fishermen's livelihoods are at stake, as are the interests of the general public who depend on domestic seafood as a sustainable and healthy food resource, and the local economies built around working waterfronts. We need to ensure that we are weighing the relative value to society of potentially conflicting ocean interests. We recommend that the regional body be a key player in facilitating these determinations.

In conclusion, it is important to establish comprehensive, regional protocols defining data gathering, monitoring, notification, communication, and interaction requirements prior to approving any ocean leases or allowing for construction. We also feel it is imperative that agreements are in place to mitigate user conflict and that protections are in place to ensure that the fishing industry will not be displaced.

Thank you for the opportunity to comment.

Sincerely,



Heidi Henninger
Atlantic Offshore Lobstermen's Assn.

----- Forwarded message -----

From: **De Guise Sylvain** <deguise.sylvain@gmail.com>

Date: Thu, Jul 11, 2013 at 4:43 PM

Subject: RPG goals comments

To: katie.lund@noaa.gov

Cc: Frohling Nathan <nfrohling@tnc.org>, Bill Wise <William.Wise@stonybrook.edu>,

Christopher Clapp <cclapp@tnc.org>, Thompson Brian <Brian.Thompson@ct.gov>

Katie,

As director of Connecticut Sea Grant, I have been involved in, and followed closely, NROC and the Northeast RPB ocean planning efforts. I attended the CT public meeting and expressed comment specific to each of the RPB goals at the meeting, but would like to further comment on the effort as a whole.

As you know, the National Ocean Policy refers to sub-regional planning. I strongly believe that Long Island Sound, bordered by two different states (CT and NY) represents the poster child for such a sub-regional planning effort. In fact, as you know, informal efforts are ongoing to build a framework for sub-regional planning in Long Island Sound. The process in Long Island Sound strives to align with ongoing effort in the Northeast. However, such a bi-state effort (the first one in the nation, to the best of my knowledge) is further complicated by the fact that CT is part of the New England region, while NY is part of the Mid-Atlantic region.

It is my opinion that it would be most useful to:

1. Clarify the jurisdiction of the New England RPB and Mid-Atlantic RPB over Long Island Sound, maybe in the form of a formal MOU between the regions.
2. Provide direct support (logistical as well as financial) to assure the success of the the first formal bi-state ocean planning effort in the nation, to demonstrate a proof of concept and fulfill the intent of the national ocean policy.

Thanks for your work, I look forward to exciting developments in the coming months and years.

Yours,

Sylvain

Sylvain De Guise, DMV, PhD
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For a thriving New England

CLF Massachusetts

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www.clf.org

July 2, 2013

Submitted electronically via <http://northeastoceancouncil.org/comment-on-the-draft-ocean-planning-goals/>.

Re: Draft Goals for Northeast Regional Ocean Planning

Dear Northeast Regional Planning Body:

Conservation Law Foundation (CLF) is pleased to provide comments to the Northeast Regional Planning Body (RPB) regarding its Draft Goals for Regional Ocean Planning in New England. CLF strongly supports the development of a comprehensive, ecosystem-based regional ocean plan as an essential mechanism for ensuring that New Englanders, and the nation, can capitalize on all that our ocean has to offer by way of food production, transportation, clean renewable wind, wave and tidal energy, recreation and jobs. It is just as important to ensure that we protect the precious ocean ecosystem, including its wildlife and habitats, that is the source of all the goods and services upon which we depend. We also strongly support the development of a regional ocean plan as an essential mechanism for implementing the goals and priorities of the National Ocean Policy.¹

CLF commends the RPB for its early and extensive public outreach in this process and in particular for conducting a series of 10 public meetings across New England to facilitate public comment on the Draft Goals. CLF has attended each of these meetings and participated in the discussions. CLF also commends the RPB for its thoughtful and deliberate development of the three goals, the accompanying potential outcomes, actions and the framing principles. As a general matter, CLF believes that the RPB has hit the mark on the goals for the regional ocean plan and we largely agree with the selection and general substance of these three goals, the framing principles, and potential outcomes and actions. Importantly, this effort clearly reflects the intent of the National Ocean Policy and Final Recommendations from the Interagency Ocean Policy Task Force², laying the foundation for the creation of a framework that will support the development of a more integrated, comprehensive, ecosystem based, adaptive and proactive approach to ocean management.

As a supplement to our oral comments at the public meetings and to highlight several particular concerns, we provide the following brief comments regarding the first two of the three goals:

¹ Executive Order 13547, Stewardship of the Ocean, Our Coasts and the Great Lakes. Fed. Reg. 43023. Thursday, July 22, 2010.

² White House Council on Environmental Quality, Final Recommendations of the Interagency Ocean Policy Task Force (July 19, 2010), available at http://www.whitehouse.gov/files/documents/OPTF_FinalRecs.pdf.

Goal: Effective Decision Making

Improve management effectiveness, intergovernmental decision making, engagement, collaboration, and integration of best available knowledge. Reflect ever-changing social, environmental, and technological conditions.

A potential action listed under this goal is to *inform and engage the public for better decision making*. CLF recommends that this action item be of top priority and should continue with the establishment of a formal and comprehensive public engagement process. More detailed recommendations can be found in the letter re: public participation submitted to the executive committee of the RPB by the New England Ocean Action Network on Friday, June 13. CLF would like to reinforce two of the proposals in that letter:

- Appointing a standing *Regional Stakeholder Advisory Panel* which consists of diverse representation from the range of traditional, current and nascent ocean user groups in New England. We do not believe that utilizing existing state advisory panels is an appropriate or prudent way to encourage regional dialogue about a large, regional planning area. Reliance upon state by state advisory committees continues a siloed approach to ocean management that regional ocean planning should be designed to avoid. State committees can be engaged at the discretion of individual states, but we believe strongly that the RPB should create and engage its own regional advisory panel.
- Creating and utilizing a standing *Science Advisory Panel* consisting of scientists from academic and government institutions across New England, as well as individuals or representatives of certain entities who have particular expertise in experiential, local or traditional knowledge. Such a Science Advisory Panel will ensure that the regional ocean planning is built upon the best available scientific data and understanding of New England's ocean, as well as help to increase credibility among the public and various ocean user groups regarding the ocean planning process.

Goal: Healthy Ocean and Coastal Ecosystems

Develop a planning framework to protect, restore, and maintain healthy ocean and coastal ecosystems that provide social, cultural, spiritual, and economic benefits. Account for changing environmental conditions and new information as it becomes available. Respect the intrinsic value of the ocean, its biodiversity, and act as its steward/caretaker, recognizing humans as part of the ecosystem.

In an effort to combine several of the potential actions listed under this goal and recognizing the vital role of healthy ecosystems to healthy coastal economies, CLF strongly encourages the development of a methodology to identify and protect important ecological areas and ocean wildlife including:

- areas of high productivity and biological diversity;



- areas and key species that are critical to ecosystem function and resiliency;
- areas of spawning, breeding, and feeding;
- areas of rare or functionally vulnerable marine resources;
- migratory corridors.

In order to do this we suggest the urgent establishment of a panel of scientists that will develop a science-based methodology for identifying important ecological areas, so that it can be implemented in the 3 year timeline contemplated for regional ocean plan development. Much work has been done in this area in Massachusetts and Rhode Island during their respective planning processes and around the world. Identification and protection of important ecological areas must be a foundational element of the regional ocean plan. Developing an agreed upon methodology early in the process will be essential to the timely completion of the plan.

Thank you for your kind consideration of these recommendations. We look forward to working with you to advance a regional ocean plan for New England.

Sincerely,

A handwritten signature in blue ink that reads "Priscilla M. Brooks". The signature is fluid and cursive, with "Priscilla" on the first line and "M. Brooks" on the second line.

Priscilla M. Brooks, Ph.D.
VP and Director, Ocean Conservation

Comments on Draft Regional Ocean Planning Goals

Submitted by Dr Damon E. Cummings, Ph.D. Ocean Engineering, Gloucester, MA,

damonc2@aol.com

6/27/2013

I found your comment form far too restrictive for what I wish to say and therefore have written this memo.

In general your introductory language is just what I wanted to hear, but the follow up and details of the goals are just what I was afraid I would hear. The overall purpose of this effort is to manage the common pooled ocean resource for the benefit of our generation and future generations. That idea including the preservation of ecosystems and of human history and traditions is expressed clearly in your introductory language. However in practice your mapping emphasis and tendency to divide areas up for specific purposes leads inevitably to privatization of the common resource and encourages consolidation of "ownership" of specific areas of the commons in a few wealthy corporate hands. There is no effort stated to restrict corporations from dominating vast areas of the ocean that are presently used by many stakeholders. Someone at the meeting mentioned "enclosures". That is my worry as well. I would prefer that you state explicitly that your fundamental task is management of a common pooled resource for the benefit of the public. (See Elinor Ostrom, "Governing the Commons" for example). Your task is huge, but unfortunately you are taking the logical but fatal tack of narrowing it down to a zoning exercise and skipping over the vital issues of pollution and climate change and basic research and preservation of the commons. Please do not make decisions impacting hundreds of future years of ocean uses based on a few short term goals such as mineral extraction or aquaculture or wind farms. I do not see anything about restoring sea life along the coast, but lots about wind farms.

On the specific subject of fishing and sea life, there seems to be little recognition that commercially important fish species tend to occur in only a tiny fraction of the ocean. There is much written in the draft about locations for ocean mining and energy production, but little about the potential impact on fisheries and fish. It is the shallow banks with upwellings of cold oxygen rich deep water that support dense schools of fish and other marine species important for human consumption. It is those very shallow areas close to shore where energy and mining corporations like to place their facilities and structures. I would like to see far more emphasis on determination of where fisheries are important and if you are going to zone, give them space and a buffer zone around those grounds. Anything moored or built on a fishing bank is a hazard to navigation.

You have caught on to including indigenous tribes in your process. However not all the indigenous groups were here before the Pilgrims. People have been living in Gloucester and fishing out of this port for four hundred years. When we go to your meetings we see that NGOs and corporations are well represented. However there were no fishermen at your Gloucester meeting. They did not even know about it. Do they not count as a tribe? The public outreach you are doing is very restrictive and should be far better advertised and publicized.

KELLEY DRYE & WARREN LLP

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Betsy Nicholson
Federal Co-lead for Northeast Regional Ocean Planning
NOAA Ocean Service
Northeast Regional Office
55 Great Republic Drive
Gloucester, MA 01930-2276

July 26, 2013

BY EMAIL

Re: Comments on Draft Goals for Northeast Regional Ocean Planning

Dear Ms. Nicholson:

On behalf of the Fisheries Survival Fund (“FSF”), we offer the following comments to the Northeast Regional Planning Body’s (“RPB”) draft goals for Northeast Regional Ocean Planning (“Draft”). FSF represents the significant majority of full-time Atlantic scallop “Limited Access” permit holders, home ported from Massachusetts to North Carolina. We appreciate the opportunity to address the role of the RPB in ocean management and prioritization of the draft goals.

In April 2013, the RPB, including its state, federal, New England Fishery Management Council, and tribal members, held a meeting to discuss regional ocean planning goals. The Draft contains a list of goals, preliminary actions, and potential outcomes discussed at the meeting. The RPB is seeking comments on the Draft so that it can revise the draft goals, actions, and outcomes at its Fall 2013 meeting. Specifically, the RPB seeks comments on which aspect of each goal (and its accompanying actions and outcomes) do stakeholders like and why, which aspects should be changed, and what should the priority outcomes and actions be for each goal for the next two years.

The RPB need look no further than existing law in answering the questions it poses to the public. Current statutes and regulations govern the priority outcomes and actions for each goal.

July 26, 2013

Page Two

As stated succinctly in the Draft's 9th framing principle: "Importantly, regional ocean planning outcomes must be implemented through existing authorities and regulations. Neither the National Ocean Policy nor regional ocean planning create or change existing authorities." Draft, at p. 1 (the "9th Framing Principle").

Supporting the 9th Framing Principle is the reality that the RPB exists and operates entirely outside the confines of an entity having the authority to implement, amend, or create anything having the force or effect of law. Congress has not authorized the RPB to exist or to do anything. The RPB does not have delegated authority to act in any legislative capacity. It does not have rulemaking authority. It is essentially an extra-legal body. Its very design limits what it can and cannot do legally. Because of this, the RPB must focus – and focus the public – on its limited capabilities.

FSF could not agree more with the content of the 9th Framing Principle or a limited scope of work for the RPB that reflects the legal limitations inherent in how it was created. The RPB should not bury the 9th Framing Principle below all the others. Doing so leads the public to believe it is on par with the other framing principles when, in fact, the law trumps the National Ocean Policy and anything put forth by the RPB. We, therefore, recommend making the 9th Principle more visible by having it stand alone and expressly govern and inform all RPB actions. The scope of the RPB's work can only be to synthesize existing information and identify gaps in information that will lead ultimately to a coordinated approach to managing the oceans under existing authorities.

Importantly, the RPB must take care not to run afoul of statutes enacted by Congress, the authority of agencies, and lawfully passed regulations. The Draft fails to acknowledge that the law deprives the RPB of doing the very thing the RPB portends to do – dictate how our oceans are managed, either by setting goals and policies not envisioned by Congress or prioritizing congressional objectives outside of the legislative process. Existing statutes and regulations prescribe the goals, their prioritization, who must implement them, and the lawful outcomes of such implementation.

For example, certain commercial fisheries are managed by the National Marine Fisheries Service and regional Fisheries Management Councils pursuant to the Magnuson-Stevens Fishery Conservation and Management Act. The intersection of ocean wind development and commercial fishing is governed by the Outer Continental Shelf Lands Act ("OCSLA"). The OCSLA prescribes the agency in charge of authorizing renewable energy projects (*i.e.*, Bureau of Ocean Energy Management), dictates the prioritization of interests on the outer continental shelf (*i.e.*, right to navigation and fishing trump new renewable projects), and sets forth the process for leasing outer continental shelf lease blocks. The RPB cannot – and should attempt to – dictate how our fisheries are managed or how commercial fishing must coexist with renewable energy projects.

July 26, 2013
Page Three

Despite the strict limitations under which the RPB can work, there is plenty to be done. Better ocean management starts with actually using existing authorities and information the way Congress – and in the case of regulations, agencies – envisioned. The Department of the Interior (“DOI”) could greatly improve *Smart from the Start* if upfront conversations occurred between wind energy developers and existing users before areas for development are selected. But this sadly does not happen. Instead, state-centric intergovernmental task forces repeatedly overlook the most obvious of ocean users – commercial fishermen – and decide on where to locate a wind farm well before most affected fishermen are made aware that a project is being contemplated. In fact, fishermen often hear about proposed projects for the first time only upon reading the *Federal Register*, well after the die have been cast on the project’s location, setting up an adversarial situation where cooperation was possible.

For regional planning to succeed, agencies must start to actually communicate and coordinate in accordance with the law and their own policies. For instance, BOEM and states often fail to reach out to the National Marine Fisheries Service (“NMFS”). Both BOEM’s regulations and the *Memorandum of Understanding on Coordination and Collaboration Regarding Outer Continental Shelf Energy Development and Environmental Stewardship between the U.S. Department of the Interior and U.S. Department of Commerce* (May 19, 2011) require BOEM and NMFS to share fisheries, effort, and habitat information to avoid user conflicts. The required information exchange rarely occurs, and when it does, it is either insufficient or too late to be of use. As a result, ocean wind energy development often steams ahead without the advantage of data on the marine environment, benthic communities, or fishing effort, locations, seasons, and restrictions that are readily available from the New England Fishery Management Council, the Mid-Atlantic Fishery Management Council, NMFS, NOAA Fisheries Sustainable Fisheries, and fishermen themselves. If the requisite information exchange occurs, ocean wind developers could avoid lucrative fishing grounds that support important fishing operations; private parties would be saved from having to engage in duplicative processes; and actual, timely development of offshore wind farms could happen.

Better coordination, information sharing, and communication would benefit all entities having a stake in our ocean’s future. The RPB should focus on this objective by honing in on the “potential actions” it enumerates in its Draft instead of attempting to list and prioritize goals that already exist in the law. Doing so ensures that the RPB does not mislead the public or attempt to undo what Congress already has done.

KELLEY DRYE & WARREN LLP

July 26, 2013
Page Four

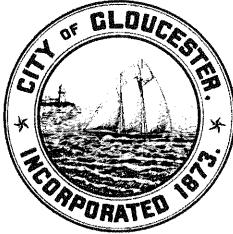
We appreciate this opportunity to comment on the RPB's Draft. We hope the RPB will take these recommendations into account in its revised goals, actions, and outcomes. As always, please do not hesitate to contact us if we can provide any further information or answer any questions about these comments.

Sincerely,



Andrew Minkiewicz
Michele G. Hallowell

City Hall
Three Pond Road
Gloucester, MA 01930



TEL 978-282-8017
FAX 978-281-9779
sgarcia@gloucester-ma.gov

CITY OF GLOUCESTER
HARBOR PLANNING

July 25, 2013

Bruce Carlisle
NROC State Co-Chair, 2012-2013
Director, Massachusetts Office of Coastal Zone Management
co-chairs@northeastoceancouncil.org

Bob LaBelle
NROC Federal Co-Chair, 2012-2013
Science Advisor, Bureau of Ocean Energy Management, DOI
co-chairs@northeastoceancouncil.org

John Weber
Ocean Planning Director
Northeast Regional Ocean Council
jweber@northeastoceancouncil.org

Dear Sirs:

It is with great interest and pleasure that the City of Gloucester sees the convening of the ocean planning for our northeast region. As a community we have a deep commitment to the productivity and health of our ocean.

We are especially grateful to contribute at this early stage in the planning process. Gloucester's harbor is one of the State's Designated Port Areas, and a working port experienced with ocean resource management, state and federal ocean permitting agencies and jurisdictions, and interest in diverse and developing ocean opportunities.

Working port communities were created around the ocean resource, and have a unique dependency and access to the resource. Regional ocean planning is a new conversation for us all.

In that spirit, we would like to start by contributing some fundamental beliefs from the working port into the framing principles:

1. The ocean's natural resources provide healthy food for the peoples of the world.
2. The ocean's natural resources may provide lessons as well as other organisms that benefit the human population in other ways.
3. Much of the ocean is unexplored and offers opportunities for scientific exploration,

The Port of Gloucester
Sustainability and Innovation at the Ocean's Edge

research, and discovery.

4. Coastal communities have historic patterns of access to the ocean based on their geography and development.
5. There is concern about changing ocean “health” and ecosystem conditions.
6. The northeast fishery is one of the most highly regulated fisheries in the world. There is recognition that ecosystem management rather than solely single species management may more effectively protect the biological resource while providing flexibility and access to the fishing sectors.

The draft plan sets out worthy goals. Our contribution to the conversation would be to more broadly frame one of them: healthy oceans and coastal ecosystems; and to aspire to stronger potential outcomes for another: effective decision making.

This community depends on a healthy ocean for its ocean-based economic livelihood, and for the patterns of our days, the movement of our seasons, and the unfolding history of our place. The health of the ocean is a top priority. It is important to describe this goal in an inclusive and progressive way, and the plan’s current description does not do this. We would bring in the movement toward ecosystem-based management into the description of what a healthy ocean and coastal eco-system means.

“Develop a planning framework for ecosystem-based management. Protect, restore and maintain healthy ocean and coastal ecosystems. Promote new and existing sustainable uses of ocean resources and the integration of public benefits across uses. Account for changing environmental conditions and new information as it becomes available.”

Broadening the definition of what a healthy ocean and coastal ecosystem means, allows us to aspire to the following Potential Outcomes:

1. Reliable, predictable fisheries exist within a sustainable healthy ecosystem. Regulators have greater capacity to integrate natural fluctuations of species’ abundance into reliable measurements of ocean health and diversity. People of the Northeast region have access to exceptionally healthy, local, wild-caught fish.
2. Biological health and diversity of the ocean improves.
3. Additional natural resources are identified and used in sustainable ways.
4. Greater diversity of uses exists without conflict.
5. Coastal communities provide portals to greater knowledge and wealth from the ocean while providing stewardship and leadership for global ocean health.

Potential actions might include:

1. Explore ways to integrate the data being collected daily from the ocean observing systems and by other means into permitting to allow real-time predictive ability and early adjustments.
2. Develop public understanding of interactions between the waters that are regulated, and those outside US jurisdiction.
3. Study potential economic returns from ocean uses. Identify developing maritime markets, remembering that fisheries management and associated regulations is a process that happens through the New England Fisheries Management Council.

Effective decision making is a priority goal for us. Good decision making would involve effective public notification and involvement, reduced barriers to action, shorter permitting timeframes, and greater satisfaction with permitting outcomes.

Permitting for new uses really requires a paradigm shift, where the agencies and the public are supported by coordinated activities. The agencies need the support from the other agencies in the room to have confidence that all effects are considered, and the public needs a central place to hear and voice information and concerns. The potential outcomes could include:

1. A coordinated permitting process – an “ecosystem” approach to permitting.
2. A central notification system for agency, stakeholder, and public involvement.
3. Mediated meetings on particular areas of concern to inform permitting authorities.
4. Complexities of timing and mitigation resolved by inter-agency and public mediation rather than by silo’d agency concerns.

Potential actions that might lead to the above outcomes might be to:

1. Develop coordinated permitting timeframes for various types of projects. Develop the data support for the coordinated agency actions.
2. Track permitting timeframes and costs for projects.
3. Provide mediation, mapping, and scientific and traditional knowledge support for complex issues.
4. Conduct studies to suggest ways to maximize public benefits by integrating objectives.

Thank you for the opportunity to comment and inform our new Northeast Regional Ocean Plan. Congratulations for undertaking what can be a daunting task, and for addressing matters of such importance.

Best regards,



Sarah Garcia, AICP
Harbor Planning Director

Cc: Mayor Carolyn Kirk
Tom Daniel, Community Development Director
City of Gloucester Fisheries Commission
City of Gloucester Maritime Partnership
City of Gloucester Harbor Plan Committee
City of Gloucester Waterways Board

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July 25, 2013

Betsy Nicholson
Federal co-lead for Northeast regional ocean planning
NOAA Ocean Service
Northeast Regional Office
55 Great Republic Drive
Gloucester, MA 01930-2276

Dear Ms. Nicholson:

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the room to have confidence that all effects are considered, and the public needs a central place to hear and voice information and concerns. The potential outcomes could include:

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Cc: Mayor Carolyn Kirk
Tom Daniel, Community Development Director
City of Gloucester Fisheries Commission
City of Gloucester Maritime Partnership
City of Gloucester Harbor Plan Committee
City of Gloucester Waterways Board

Dawn Hellier
oceansuis@gmail.com

May 29, 2013

Betsy Nicholson, NOAA and RPB Federal Co-Lead
Grover Fugate, Rhode Island Coastal Resources Management Council and RPB State Co-Lead
Chief Richard Getchell, Aroostook Band of Micmac Indians and RPB Tribal Co-Lead
Northeast Regional Planning Body Members, c/o katie.lund@noaa.gov

Dear Northeast Regional Planning Body Co-Leads and Members:

Please accept this correspondence as submission of written public comment to the Northeast Regional Planning Body (NE-RPB).

The public meetings that are scheduled throughout the New England region have the potential to serve as a springboard toward meaningful and diverse collaboration and discourse on ocean planning in the Northeast, yet there are some continuing significant issues and concerns about how the NE-RPB and its supporting partners are approaching public engagement, participation and the overall process that will greatly inhibit the initiative that the NE-RPB is championing. While each of these issues are related, for ease of reference I will address observations about each of them separately as follows:

I. Public Engagement

A. *Improve timeliness of disclosure of information.* In the case of the Portland public meeting, which was notably the first in the series of public meetings and therefore sets the expectations and tone for the remaining New England meetings, the draft regional ocean planning goals were not posted until May 20, 2013, three days prior to the meeting. The delay in posting the materials that were to be a primary topic of the meeting affects the ability of the public to make informed and studied input or even to make decisions about whether to attend or participate as there was insufficient time to review the materials by the time they were posted. In addition, the meeting agenda was not made available until the meeting itself leaving prospective attendees in the dark about the format of the meeting. One meeting attendee commented about not knowing what the meeting format was going to be which necessitated his on the spot modification of his comments to meet the actual meeting format.

The Portland and Narragansett meetings also proceeded without the public having had the benefit of reviewing written public comments from the April meeting as they have not yet been posted. Meeting attendees and interested members of the public have no idea what written comments were submitted. Those who submitted written public comments have been left wondering whether the comments were even distributed to NE-RPB members, if they have even been read and whether others submitted comments of a similar nature. The delayed disclosure of the video from the first part of the first day of the April meeting in which the draft regional ocean planning goals were discussed is also unfortunate although video from the other portions of the meeting was posted earlier.

Similar concerns about delays in information posting were raised in writing in connection with the April meeting prior to the April meeting even taking place. The failure to address these issues is very disconcerting particularly in light of the fact that they are not a new or isolated occurrence and considering that the process now has the services of a Communications Specialist and the Consensus Building Institute for these meetings. The public announcement of the hiring of the Communications Specialist and webpage statements about information being available in mid-May generated expectations about anticipated improvements in the timeliness and completeness of information postings which are not being met.

B. Clearly and timely indicate revisions or updates to meeting information. Information concerning the meetings continues to be disclosed in piecemeal increments without any alerts or indications as to when the website has been updated. This was also previously expressed as a concern in connection with the April meeting. Between the time the initial schedule of meetings in New England was announced and the time of the Portland and Narragansett meetings, any individual who was looking for information would have to check the website on a repeated basis to see if and when any new materials were posted and even then it was not readily apparent unless one read through the entire webpage. Given the time constraints that everyone is facing this is not an efficient way to disclose information and may have the tendency to discourage participation. Individuals who viewed the meeting information page shortly after having received the meeting announcement notice had no idea when or if any of the meeting information was revised or information added.

C. Re-Examine the Messaging. The NE-RPB needs to communicate about this process in a way that is understandable, relevant and underscores the personal importance of this initiative to the public. The messaging has to go beyond announcing the meeting dates, times and locations and that public input is being sought on regional ocean planning goals. There needs to be a more specific explanation of what this process means to the public. As one of the May meeting attendees in Portland put it "...the fishermen would be like why am I here?" and how does this process impact fishery management? The public needs contextual information on this initiative that makes it relatable, approachable, less abstract and sets it apart from typical bureaucratic initiatives. Articulating what this process means in relation to other regional, subregional, state and local ocean planning processes is highly recommended. The public has no idea which planning process is most important and where their participation matters the most. For example, what is the effect of this process on the RI Ocean SAMP, the MOMP or a subregional or local planning process? Despite a question along similar lines also having been raised at the Narragansett meeting, it remains unclear. The mission statement in the Charter does little to more specifically address this issue. In addition, the public needs to know that while this process is about planning to better manage multiple and diverse uses of the ocean, it should not be assumed that it will have any effect on development activities that are currently taking place during the planning process. It would be helpful to know however the extent to which the NE-RPB members expressed commitments to improved coordination and information sharing within any existing legal or policy frameworks can be effected in the interim period.

It also appears that the means chosen to advertise these meetings which I understand to have been generally through local newspapers in the events calendar section on the Sunday preceding the meeting, the webpage and to individuals or groups that have already been involved in the process whether because of a prior meeting or workshop will not serve to foster the diversity of

input that will best serve the process. There are a multitude of organizations that the NE-RPB can use to assist with getting the word out on these meetings. It would be of interest to know which organizations and media outlets were contacted and when, how they were selected and what information they were provided.

An opportunity to improve upon outreach was completely missed at the Portland and Narragansett meetings when attendees could have been surveyed at the time they arrived at the meeting about how, where and when they learned about the meetings or what sources do they generally receive this type of meeting information through. Had this been done, the NE-RPB would have had some preliminary information about how information was being received and how to improve on communication efforts and information distribution.

Examining which interests were represented at the Portland and Narragansett meetings from the sign-in sheet can also be revealing of how efforts to involve the public in this process are or are not working. In the case of the Portland meeting, it appeared that of the 20 to 25 members of the public present, the majority of them were being paid to be present. Despite the significant population size of that region, the general public was not present. The NE-RPB should take that experience as an indicator of the need for additional efforts to engage other segments of the public in this process beyond the interests that are already participating. It appeared to be the same situation in the case of the Narragansett meeting which, given its dual purpose of discussing both the RI Ocean SAMP revisions and the NE-RPB draft regional goals, should result in more heightened concern about the absence of general public attendees or any local officials.

II. Public Participation

Executive Order 13547 under which the National Ocean Council (NOC) was created, defines “coastal and marine spatial planning” to be, in practical terms, “...a public policy process for society to better determine how the ocean, our coasts and Great Lakes are sustainably used and protected...”¹. If the NE-RPB sincerely values public input and involvement, and wishes to make it the “inclusive, bottom-up” process envisioned by the Executive Order, it must demonstrate that in its actions, processes and communications. Repeated statements of being committed to those principles without corresponding actions and behavior will only serve to discourage participation and generate governmental distrust. Despite the regular recitation of public input being elemental to this process, it remains unclear what value is actually being placed on public participation in this initiative and how that will be reflected. This essential undertaking demands a maximum effort to make the public aware of this process and to create opportunities for actual public participation so that the value of the collective experience and knowledge can be realized in the planning process.

As these meetings go forward, it seems that many of the remarks made by one of the NE-RPB members on public engagement and participation at the November 2012 inaugural meeting have gone into an abyss. The NE-RPB meeting summary in reporting this member's summary of stakeholder feedback states in pertinent part, that stakeholders indicated²:

1 See Executive Order 13547 <http://www.whitehouse.gov/the-press-office/executive-order-stewardship-ocean-our-coasts-and-great-lakes>.

2 See p. 25 of the NE-RPB November 2012 Meeting Summary at <http://northeastoceancouncil.org/wp-content/uploads/2012/12/Summary-NE-RPB-Meeting-Nov-19-20-20121.pdf>,

“Stakeholders are concerned that this process seems very top-down”. “It is confusing for stakeholders to begin engagement with a discussion about regional goals”. “The messaging has been insufficient to date”. “The identification of benefits for each constituency will be very important”. “The NE-RPB needs to demonstrate why people should care about this” “Stakeholders want to know if this is going to benefit them or harm them” “People want to know who is going to make which decisions. They need clarity about the roles and decision making responsibilities of the NOC, the NE-RPB, etc.” “Stakeholders also need a clear time line and an understanding of how and when they can engage, what materials they should be reviewing, and assurance that their engagement is a good use of their time” “People want to understand how decisions about tradeoffs will be made in the planning process”

Addressing these information needs and process questions early on seems not only advisable but necessary to a process in which public participation is essential. For example, you may wish to consider the following:

A. Treat all Members of the Public Equally. The public comment guidelines posted for the May and June public meetings do not permit the mailing of written public comments during the comment period which would allow for public comment by those who do not use or have Internet access and who may not be able to attend the meeting. It is noted that hardcopy written comments may be submitted by those who attend a meeting but not by those who do not. There should be no differentiation in participation rules based upon format submission or meeting attendance. The current guidelines are unnecessarily excluding certain members of the public from participating in the process. It is noted that this concern was raised at the Portland meeting and although the Narragansett meeting facilitator continued to make reference to the public comment guidelines, Betsy Nicholson verbally indicated to meeting attendees that comments could be mailed in to her.

B. Do not Direct How Participation should Occur. In the case of both the Portland and Narragansett meetings, attendees were directed to make comments on the draft goals in response to two specific questions about the goals or if they wanted to submit written comment to use the Public Comment Form provided at the meeting. While having a standardized public comment format might make it easier to compile the public comments, it unnecessarily directs and limits how public participation should occur. It is noted that the form indicates that comments in general on other related topics of interest were welcome but that was not the sense given attendees by the meeting facilitator who made several statements about keeping the commentary specific to the two questions related to the draft goals.

C. Record the Public Meetings. While there appeared to be a Consensus Building Institute associate taking notes on the comments made at the meetings in Portland and Narragansett, it is of concern that as the meeting facilitator put it in Narragansett, that they were “only going to be capturing the gist of the comments made at the meeting”. A lot can be lost in this approach and certainly any one who did not attend the meeting will not have the benefit of knowing the full content and context of the public comments and discussion that took place. Recording the gist of the comments is also a subjective process and one that can put the transcriptioner in the position of making uninformed judgments about what is important to capture.

B. ***Create Feedback Loops.*** Steps must be taken to make this process not consist of a one way flow of input from a limited number of interests or individuals. The process does not adequately afford the public the opportunity to know the impact of or reaction to their input. This was a concern cited by a NE-RPB member at the inaugural meeting back in November of 2012³. The May meeting in Portland had some occasions of exchange between attendees and the meeting representative(s) which although they were fairly limited, were a positive development. Unfortunately, there were also several times in which a meeting representative would end the public exchange with a statement that the conversation could continue in some private or other forum leaving the other meeting attendees and meeting representatives without the benefit of knowing the sidebar communication.

III. Process

There are some fundamental questions about the process that is being deployed in this initiative that remain unanswered that include but are not limited to the following:..

A. ***What is the Specific Geographic Planning Area.*** It is not clear that the specific geographic planning area for the NE-RPB has been decided which would seem to be an important fundamental and primary element of the process. In fact, it is identified as an initial matter to be defined in the goal setting guidance and by the NOC. As indicated in a prior submission, whether or not inland areas are to be included would seem to be a critical first decision that precedes the goal setting process. This was an issue that was also raised by one of the Portland, Maine May meeting attendees yet even the Charter leaves it as an open question.⁴

B. ***What is the status of the Capacity Assessment Process for the NE-RPB.*** In addition, although previously identified in the listing of key next steps from the inaugural meeting, the April meeting agenda did not reflect the capacity assessment process for the NE-RPB and the status of the template that the Executive Secretariat was going to be develop as an agenda item. It would seem that how, when and by whom that assessment will be conducted is a critical initial element of commencing the process and one that would better inform the goal setting process.

In addition, educating the public about what aspects of the Environmental Assessment (EA) and Environmental Impact Statement (EIS) process in New England are not working to address some of the issues that are part of this initiative or why information sharing and coordination is not already taking place within existing frameworks that not only allow for it but require it would be helpful.

C. ***The Charter.*** The Charter has been identified as having been approved despite the fact that

3. See pp. 13-14, and 25 of the NE-RPB November 2012 Meeting Summary at <http://northeastoceancouncil.org/wp-content/uploads/2012/12/Summary-NE-RPB-Meeting-Nov-19-20-20121.pdf>, "Members focused on the need for a two way flow of communication with stakeholders and the need to engage them continuously at every step, including through the work of this NE RPB and the planning-related projects of the individual Member states, agencies, tribes, and the NE FMC. A need to set stakeholder expectations about how and when they would be able to engage, and how their input would be used, was noted." "They want to be kept informed with feedback loops"

4 See NE-RPB Charter , p. 1 at http://northeastoceancouncil.org/wp-content/uploads/2012/11/Charter-without-signatories_FINAL.pdf. "Additional inland waterways may be included as the RPB deems appropriate".

it does not appear that it has had official sign off by the authorized representatives of each NE-RPB member. This document which governs how the NE-RPB operates and defines its purpose has been very quickly put into place without questions such as local representation being fully resolved. Local representation is an issue that has been raised with some frequency and yet the document that addresses that very question and the overall purpose and function of the NE-RPB has not been included as an agenda item in the public meetings scheduled for May and June.

D. ***Define the NE-RPB in relation to other similar Planning Initiatives.*** It is still not clear what the difference and relationship between Northeast Regional Ocean Council (NROC) and the NE-RPB are making it difficult for the public to know where, when and before whom to participate and what effect or role that participation has or could have. It would be extremely helpful to have an articulation before the NE-RPB proceeds further with its public meetings that addresses what the differences are, including how the NROC work and its committees and work plans relate to the work of the NE-RPB, whether the NE-RPB endorses all of the work and activities of NROC, etc. It is not enough to simply indicate that NROC is in a support and resource role as without more it leaves open too many questions about what appear to be overlapping activities, authority and responsibilities.

E. ***What is the impact of this process on development activities and managing multiple and diverse uses of the ocean in the interim?*** The public needs to understand what the effect of each NE-RPB member's commitment to this process means in terms of its impact, if any, on pending ocean related development activities and licensing and permitting proceedings that are occurring within each member's jurisdiction.

F. ***The Role of Mapping in Ocean Planning.*** There has been considerable emphasis on the role of mapping in this initiative and it is being presented to the public as a "decision support tool" for ocean planning efforts. The significant and potentially premature emphasis on the mapping "products" during these public meetings is creating a perception that they are the primary catalyst to improved information sharing, better interagency coordination and balanced decision-making. While integrating publicly available science and information is essential and mapping is a useful planning tool in that regard, it seems that caution should be exercised on how the mapping products are being showcased. Certain data sets might have value that is only temporal or circumstantial in nature and/or have data quality or application limitations that are not immediately apparent to the user. The origin of particular data sets and any data quality or other limitations should be continuously and conspicuously posted. As one Portland attendee noted maps are great for what they are but you need to write limitations on what they are. The significance of what can be understood and what relationships can be ascertained by overlaying data sets which was also raised by another attendee with respect to cumulative impacts needs to be fully and completely articulated to the public. The public should not come away with the message that ocean planning is simply about the maps or that maps make it simple.

As a final note, some of the maps displayed at the Narragansett meeting contain information that details the location of potentially vulnerable physical critical infrastructure such as submarine cables that might present a concern for homeland security particularly as our marine physical infrastructure may have greater vulnerability than our terrestrial physical infrastructure. Has the U.S. Department of Homeland Security or any state homeland security agency vetted public disclosure of some of this type of mapping information?

Thank you for your consideration of this submission.

Respectfully Submitted,

Dawn Hellier

From: Dawn Hellier [mailto:oceansuis@gmail.com]

Sent: Wednesday, June 05, 2013 8:27 AM

To: Mendelson, Meredith

Cc: Leyden, Kathleen

Subject: Fwd:

Good Morning Meredith,

Thank you very much for taking the time to speak with me at the Monday, June 3, 2013 public meeting of the Northeast Regional Planning Body (NE-RPB) in Ellsworth, Maine.

As we discussed, I have concerns about the overall process with which the regional planning initiative is proceeding, including but not limited to how public engagement and participation are being approached. Many of these concerns are articulated in more detail in the comments that I have submitted which are attached for your review and consideration but the primary essence is as follows:

1) The Process. The NE-RPB has proceeded to approve a charter and draft regional ocean planning goals without having first determined key critical issues such as the geographic scope of the planning area (i.e. does it include estuaries) and conducting a capacity assessment. How can the NE-RPB determine its draft goals, including regional priorities, if it has not defined the problem and fully understood its operating parameters. This would necessarily also seem to require a very clear and specific articulation of how this process integrates, if at all, with existing similar state, regional subregional and local planning processes (e.g. NROC, Gulf of Maine Council on the Marine Environment) as well as agency strategic plans. In addition, since information sharing and coordination are a primary step towards improved decision making, it would seem that an assessment or understanding of the existing frameworks in which this should be occurring and why it is not occurring (e.g. environmental assessments, environmental impact statements, regulatory impact analyses, fiscal impact statements, etc.) and an examination of the limitations on those frameworks/systems which would necessarily include identification of any legal constraints on inclusion of certain data sets or information sharing would be a primary first step.

It also seems that there has been perhaps a very premature emphasis on mapping which I think takes away from public focus on some of these initial critical first steps. This is not to say that mapping does not have value, but it is not the primary catalyst to managing conflicting uses of the ocean and should not be presented as such. It also seems that at the very least, spatial, temporal and other limitations on the data sets need to be clearly understood upfront as well as the fact that simply overlaying data maps without any scientific understanding of how the data sets relate to each other or even what conclusions, if any, can be drawn from the overlays is dangerous. It is also not clear why the maps have become so highlighted when ultimately, it will be the existing laws, regulations and policies and resources that determine whether such information can even be considered which gets back to the need for the capacity assessment which has yet to take place. Identifying the mapping as a "decision support tool" without putting the context in which it can or will be used does not seem fair to the public understanding of this process. The value that human context can bring to mapping also seems largely absent.

2) Public Engagement. As you indicated at the Ellsworth meeting, the attendance at the public meetings of the NE-RPB to date has largely included paid representatives of environmental non-profits, industry and other organizations. Considering how many people and communities this process could impact, has been minimal. There is a general lack of diversity in attendees, virtually no local official representation and many people seem to know nothing about this initiative. Seafood consumers, the tourism and hospitality industry, recreational users, coastal

landowners etc. seem to be missing entirely. It is also surprising that more of the many academic institutions and research institutes with marine focused programs in Maine are not involved. Both the messaging and outreach seem to be targeting the same groups again and again. Each NE-RPB member has resources or contacts within their existing jurisdiction and authority that it would seem could be leveraged for improved communication and outreach. It is not enough to publish an announcement for these meetings in the events calendar of a major regional newspaper just a few days before these meetings. It is also not enough to simply say that these meetings are about draft regional ocean planning goals. This process needs to be communicated in ways that are understandable, relevant and personally important to a variety of people.

3) Public Participation. I continue to have serious concerns about how public participation is being directed in this initiative which I would be happy to discuss with you in more depth at your convenience. The fact that public comments at the May and June meetings are being made without the benefit of knowing what written comments were submitted at the April meeting, what public comments have been made at the recent meetings that have taken place in Portland, Narragansett and Ellsworth and that comments that are being made are being summarized (which can be a rather subjective process) is disconcerting. Since this is a regional initiative, it would seem to be advantageous to know what people in other parts of the region are concerned about before these meetings take place. Part of this process involves raising awareness and educating ourselves. That cannot take place if information is not timely disclosed or provided.

I would welcome the opportunity to speak with you further and greatly appreciate your time and interest in hearing from members of the public on this matter.

Regards,
Dawn Hellier

----- Forwarded message -----
From: **Dawn Hellier** <oceansuis@gmail.com>
Date: Tue, Jun 4, 2013 at 3:56 PM
Subject:
To: Dawn Hellier <oceansuis@gmail.com>

Dawn Hellier
oceansuis@gmail.com

July 8, 2013

Betsy Nicholson, NOAA and RPB Federal Co-Lead
Grover Fugate, Rhode Island Coastal Resources Management Council and RPB State Co-Lead
Chief Richard Getchell, Aroostook Band of Micmac Indians and RPB Tribal Co-Lead
Northeast Regional Planning Body Members

Dear Northeast Regional Planning Body Co-Leads and Members:

Please accept this correspondence as submission of written public comment to the Northeast Regional Planning Body (NE-RPB) supplementing my prior submissions and communications.

The draft regional ocean planning goals which are separately stated with their own respective potential outcomes and actions do not seem to be articulated in a way that demonstrates their relationship to an overarching principle or places them in any contextual framework, making it difficult to understand how they would work together in an overall comprehensive, integrated planning effort. Creating a single framework that illustrates how the goals (and potential actions and outcomes) integrate/relate to each other will not only provide necessary context for the planning process but can also serve as an educational tool. To date, the draft regional ocean planning goals have been treated as separate and distinct “bins” since the time of the April meeting through the May/June public meetings and as presented seem to suggest the development of three separate planning frameworks despite the fact that effective decision making should consider what is necessary for a healthy ocean and coastal ecosystem and how decisions and the decision making process should consider and recognize other uses.

The mission statement of the NE-RPB could be a potential vehicle to further an understanding of the ultimate aim of this initiative and provide a more comprehensive and specific understanding of the intent of and interconnection between these goals. The mission of the NE-RPB as set forth in the approved charter reads as follows:

“Mission

By committing to this process, RPB members agree to participate in regional ocean planning as a framework for improved coordination and decision making. This cooperative regional approach will build partnerships that encourage sharing of information and best practices, help foster mutually agreed upon goals and objectives, and make more effective use of scarce resources by focusing those resources on the highest regional priorities.”

The actions identified in the present mission statement such as improved coordination and decision making, information sharing, best practices and resource sharing are positive but are not given a contextual framework so that those actions and NE-RPB goals can be better understood. For example, it is unclear what and who defines the “improved coordination and decision making” that the NE-RPB is trying to achieve. So perhaps, as an initial step, re-defining the mission in way that more specifically identifies the core function of the NE-RPB (i.e. to develop a more integrated, comprehensive, ecosystem-based, flexible and proactive approach to planning and managing sustainable multiple uses across sectors and improving our stewardship of the ocean and coastal ecosystems). Including a definition of ecosystem-based management¹ and specifically defining the geographic scope might also serve to better inform the process and function of the NE-RPB. Redefining the mission is suggested also for the reason that it would provide a primary objective that would inform the draft regional ocean planning goals. The framing principles are difficult to use in this regard as they seem to represent a combination of considerations, facts and concepts.

¹http://northeastoceancouncil.org/wp-content/uploads/2012/11/Charter-without-signatories_FINAL.pdf. Last accessed 7/1/13.

2Definition: Ecosystem-Based Management (EBM) is an integrated approach to resource management that considers the entire ecosystem, including humans, and the elements that are integral to ecosystem functions. EBM is informed by science to conserve and protect our cultural and natural heritage by sustaining diverse, productive, resilient ecosystems and the services they provide, thereby promoting the long-term health, security, and well-being of our Nation.

http://www.whitehouse.gov/sites/default/files/microsites/ceq/sap_1_ebm_full_content_outline_06-02-11_clean.pdf. Last accessed 7/3/13.

It also seems that a more in depth review and understanding of the specific nature and scope of the problem from the regional perspective with input from many diverse sources would be a beneficial step in the goal setting process. The NE-RPB could possibly undertake this endeavor through some of the following actions:

- Identify with greater particularity the concerns/issues that are regionally specific;
- Identify those legislative and regulatory requirements and programs impacting the Northeast region that have an ocean or coastal related connection that do not use and are not adaptable to an ecosystem based management approach. Review how such programs are managed and explore what changes need to be made to transition to an ecosystem based management approach;
- Identify those legislative and regulatory requirements and programs impacting the Northeast region that have an ocean or coastal related connection that do employ an ecosystem based management approach. Review how such programs are managed and explore what is or is not working about the approach used;
- Identify those coastal/ocean activities in the Northeast region that are not regulated and determine how information about those activities and their effects on the ocean and coastal ecosystem can be regularly and continuously collected and considered in the context of decisions and/or policies regarding other ocean-related and coastal activities;
- Identify what mechanisms currently exist in the Northeast region for management of anticipated or future ocean uses, including any gaps or deficiencies;
- Identify what mechanisms currently exist for inter-regional communication and coordination about programs/projects on coastal or ocean related activities/uses and what works/doesn't work about such mechanisms (e.g. does NROC provide functionality for this type of communication and coordination and if so, how can such communication and coordination be enhanced). Examine perspectives on when, where, how, what inter-regional communications/coordination should occur.
- Identify what, how, and when data, expertise and resources within the general public, the academic community, governmental and nongovernmental and tribal entities can or should be accessed and leveraged to promote the mission of the NE-RPB.

It is hoped that consideration will be given to re-examining how this initiative is being approached and that enhancements will be made so that the value that diverse public engagement and participation can have in this process can be recognized in this critical early stage before any draft regional ocean planning goals and related potential actions are finalized.

Thank you for your consideration of this communication.

Respectfully Submitted,

Dawn Hellier

ec: Betsy Nicholson
 Grover Fugate
 Chief Richard Getchell
 Katie Lund, NE-RPB Executive Secretary

Betsy – I thought your presentation last night was really good. It was one of the better explanations of what is going that I have heard. After the meeting, others made similar comments to me as well.

One thought on how to improve the presentation is talk more about the things that the federal government can do that are not regulatory or wouldn't involve changing regulatory authority. It seems like people in the room think, well if it doesn't change regulations, whats the use? In my mind, being really clear about the other things government does outside permit and regulation would help the attendees relate to the process and not get as caught up in the regulatory issue.

Being clear that the government funds research, conducts science, provides technical assistance, builds things, is a user of ocean space it self and having a regional plan could help improve how these services are delivered. The RPB process is a good opportunity to help get the federal government agencies focused on the issues that are priorities for the region and start helping us address those issues in a non regulatory manner.

I would also hit the point about the government not coordinating or talking to each other much harder. If that is all that happens with the process, I think we will still see significant benefits for the region.

Anyway – thought you guys did a good job and presented the material well. I definitely enjoyed hearing the comments from the audience and hope that the other federal members of the RPB will be able to get some of the meetings so they can hear the comments as well.

Looking forward to seeing you in Rockland and Ellsworth. Hope you have a good weekend.

Best,

Nick

| **Nick Battista** | Marine Programs Director | Island Institute | 386 Main Street | P.O. Box 648 | Rockland, ME 04841 |
207.691.3554 cell | 207.594.9209 | www.islandinstitute.org | www.workingwaterfront.com



Friday, June 28, 2013

Betsy Nicholson
Federal co-lead for Northeast Regional Ocean Planning
NOAA Ocean Service
Northeast Regional office
55 Great Republic Drive
Gloucester, MA 01930-2276

RE: Islesboro Islands Trust Comments on Draft Ocean Planning Goals

Dear Ms. Nicholson:

Attached please find Islesboro Islands Trust's comments on the Northeast Regional Planning Body's draft goals and actions. Islesboro Islands Trust (IIT) is a nonprofit land trust with a strong and long-term commitment to protection of the natural environment in the Penobscot Bay region of the coast of Maine.

In addition to directly protecting nearly 1,000 acres and more than nine miles of shoreline in the Penobscot Bay island community of Islesboro, IIT successfully engaged in several regional matters of considerable import, including opposition to development of LNG and LPG facilities and participation in the creation of a conservation easement on about three-quarters of state-owned, nearby Sears Island.

Islesboro is uniquely situated at the mouth of the Penobscot River and at the head of the Bay. The Penobscot Bay and River, both largest in Maine, exert a tremendous influence on and are influenced by the Gulf of Maine. Recognition of this pivotal location informs our comments on the draft Northeast ocean planning goals. Further, IIT is anxious to be engaged in the planning process and will make every effort to provide constructive contributions to the Planning Body's work. Please let us know how, when and where we can effectively participate further in your execution of the President's 2010 executive order, *Stewardship of the Ocean, Our Coasts, And the Great Lakes*.

Sincerely:

Charles Verrill, President

Stephen Miller, Executive Director



Comment on the Draft Ocean Planning Goals

Please share your feedback on the Northeast Regional Planning Body's draft regional ocean planning goals. We will compile your input with the rest of the feedback received during the public comment period.

The public comment period is open from May 23 to June 28. You can provide input in one of three ways:

- On the form below, which includes the option of submitting comment letters.
- On paper at our public meetings.
- Verbally at the public meetings during the public comment portion of the agenda.

We are interested in your thoughts on the questions below, which are specifically tailored to the draft goals and example actions, but welcome your comments in general on other related topics of interest. A main purpose of the questions is to obtain your input on priorities to help identify opportunities for near-term progress through 2015.

- Name:
Stephen Miller
- Email:
iitsmill@gmail.com
- Affiliation:
Islesboro Islands Trust

Draft Goal One: Effective Decision Making

1. Which aspects of draft Goal One and example actions do you like or would you change and why?

- I like:
"Engagement and collaboration"
- I would change:
What does "improved decision-making time" actually mean? There are occasions when insufficient time has been given to research and review of relevant environmental, social and cultural facts and considerations during an agency's decision-making process. There have been times when insufficient agency staffing resulted in delays. Therefore, improving effective decision-making may be a more appropriate goal.

This goal and its potential outcomes fail to indicate how any decision-making process can better incorporate regional priorities, public engagement and collaboration, all of which are important goals.

A potential outcome of Goal One is to reduce appeals and conflicts. How might this be accomplished and at what cost? Reduction in appeals and conflicts suggests to us better engagement and collaboration, which may take more time in the decision-making process than anticipated.

2. Of the example actions under draft Goal One, please check those you think should be the priorities.

- a. Incorporate regional data and maps into regulatory processes.
- b. Increase interagency coordination across management and regulatory programs.
- c. *Inform and engage the public for better decision making.*
- d. *Coordinate and leverage science, traditional knowledge, and data development to address regional priorities.*
- e. Conduct regional cumulative impacts analysis using improved environmental and ocean use information and data.
- f. Other

3. Other thoughts on draft Goal One you would like to share? n/a

Draft Goal Two: Healthy Ocean and Coastal Ecosystems

1. Which aspects of draft Goal Two and example actions do you like or would you change and why?

- I like:
"protect, restore, and maintain healthy ocean and coastal ecosystems that provide social, cultural, spiritual, and economic benefits. Respect the intrinsic value of the ocean, its biodiversity, and act as its steward/caretaker, recognizing humans as part of the ecosystem."
- I would change:
Public input into definitions and characterizations of "important, significant, or valuable area" is essential, including "citizen science" such as water quality monitoring data.

It is not enough to "identify opportunities within existing regulations and authorities for restoration and protection." It strikes us as clear that existing opportunities and regulations have failed to adequately protect and/or restore critical marine species and habitat. New protective regulations and opportunities are necessary now, more than ever.

2. Of the example actions under draft Goal Two, please check those you think should be the priorities.

- a. *Map species and habitats; assess trends.*
- b. Working within existing regulations and authorities, use publically accessible maps and trends to define and characterize important, significant, or valuable areas.
- c. *Identify geographic areas and species that are important for sustenance.*
- d. Identify opportunities within existing regulations and authorities for restoration and protection.
- e. *Model future environmental conditions, such as potential climate change effects on species' habitat, distribution, and/or abundance.*
- f. Prioritize science and research needs to fill key gaps in knowledge.
- g. Other

3. Other thoughts on draft Goal Two you would like to share? n/a

Draft Goal Three: Compatibility Among Past, Current, and Future Ocean Uses

1. Which aspects of draft Goal Three and example actions do you like or would you change and why?

- I like:
“Recognize local priorities...” and “assessment of regional coastal and ocean economy.”
- I would change:
Considerations of regional infrastructure needs must be tied to clear public interests and incorporated into decisions to benefit the people and the region’s ecological foundation. When identifying shoreside infrastructure needs, the prioritization process should also consider any shoreside infrastructure’s problems and excesses and opportunities to diminish or remove those negative contributions to a region’s economic and environmental balance and well-being.

2. Of the example actions under draft Goal Three, please check those you think should be the priorities. If you feel action c below is a priority, please identify priority items from the list below action c.

- a. *Identify and where possible map existing uses (fishing, boating and other recreation, shipping and commerce, etc.) and related infrastructure. Identify practical implications of new and changing activities on the regional economy and environmental and cultural resources (including potential paleocultural resources).*

- ✓ *b. Identify and map cultural and historic sites.*
- c. Enhance viability of and compatibility among new and existing ocean uses, specifically by considering the following, drawing upon existing sources of information where available and appropriate.
 - ✓ *i. Assess current and foreseeable trends in maritime commerce, particularly related to potential implications of short-sea shipping, the widening of the Panama Canal, and other economic drivers.*
 - ✓ *ii. Assess current and foreseeable trends in commercial fishing in New England, relying on information available through fisheries management efforts.*
 - ✓ *iii. Assess current and foreseeable trends in ocean-based renewable energy development on the regional economy, compatibility with other existing uses, regional electricity transmission, and other related issues.*
 - iv. Assess potential for offshore aquaculture, particularly considering the regional nature of this ocean planning effort, existing federal regulatory framework, and technology trends.*
 - v. Assess current and foreseeable uses of seafloor material (extraction for beach nourishment or siting of disposal areas), considering recent storms and related federal and state responses, long-term trends, needs for disposal of dredged material, and related issues.*
 - vi. Assess existing shore-side infrastructure that directly affects ocean habitats and species (combined sewer overflows, discharges, etc.) and assess need for improvements.*
- d. Other

3. Other thoughts on draft Goal Three you would like to share?

- ✓ Reconstruct or maintain historical marine uses where appropriate
- ✓ Protect, maintain and enhance current sustainable uses
- ✓ Prevent future uses that would degrade or threaten appropriate past and current uses
- ✓ Remove current uses that are unsustainable or which degrade the environment

<http://northeastoceancouncil.org/comment-on-the-draft-ocean-planning-goals/>



9 July 2013

Dear Colleagues:

Thank you for inviting comments on the Draft Regional Ocean Planning Goals for the Northeast Region. We have three comments, two of which transcend the specific goals.

First, we commend you for identifying the three goals and affirm that as citizens and as scholars of the science and practice of marine ecosystem-based management, these three goals create a proactive, comprehensive, and visionary framework for stewarding our region's coasts and oceans. We hope that they remain largely unchanged as the process proceeds. However, we are concerned that the outcomes and even more so, the proposed actions, may not enable fulfillment of these goals. The proposed actions listed under each of the goals are far too general. In many cases, it is not clear what institutional, social, or biophysical indicators would be developed in order to track progress towards the overall goals. **We suggest that the Regional Planning Body (RPB) develop and broadly share a clear theory of change in order to link the three goals with specific actions and anticipated outcomes and that this effort be done on multiple time scales. This is an area where we could be of assistance.** Research by ourselves and others has shown that in previous ecosystem-based planning and management efforts, institutional changes that contribute to healthy coasts and oceans occur on a much shorter time scale than meaningful changes in human welfare or ecosystem condition. It is important that the RPB acknowledge the diversity and temporal staging of actions and associated outcomes that are needed in order to advance the three goals, and more explicitly link specific actions, outcomes, and goals. **We urge that the final 'goals' document includes a clear vision for what the RPB aims to catalyze in terms of regional actions and in the water demonstration projects on two, five and ten year time frames.**

Second, we were surprised to see how many of the potential actions listed under each of the three goals are essentially science projects. While we believe that science can make critical contributions to meeting the three goals, our own scholarship and policy experiences suggest that science is most useful when it is in support of particular actions or outcomes. Specifically, **in the context of Healthy Ocean and Coastal Ecosystems goal, we strongly urge that the actions that involve mapping, identification of areas of regional importance, and prioritizing research needs be more clearly linked with the overall goal of creating a framework that will protect, restore, and maintain healthy coasts and oceans.** The outcomes listed under this goal may be necessary but certainly are not sufficient to meet this goal.



BROWN

ECOLOGY &
EVOLUTIONARY BIOLOGY

Finally, so much data and expertise already are available within our region; what is needed is synthesis and translation of that knowledge in order to guide planning, implementation of actions, and assessment of impacts and progress toward the three goals. To advance that synthesis and translation, **we urge the RPB to create a scientific advisory group that draws upon the full diversity of natural and social science researchers engaged in related work in the region.** Creation of a scientific advisory group is a specific, measurable potential action that could be listed under all three of the goals. In order to encourage the research community to frame scientific actions in support of the three planning goals, it would be very helpful to include stakeholder representatives as part of this group or create some other clear connection to the policy domain within which the RPB is operating.

We thank you for the opportunity to comment on this developing framework for stewarding our region's coasts and oceans and look forward to participating more in the coming months.

Sincerely,

Heather Leslie, PhD

Peggy and Henry D. Sharpe Assistant Professor of Environmental Studies and Biology
Center for Environmental Studies and Dept. of Ecology and Evolutionary Biology

Karen Cortes

Brown University Undergraduate Researcher
Class of 2014 (Anticipated ScB in Marine Biology)

Megan Palmer

Brown University Undergraduate Researcher
Class of 2014 (Anticipated ScB in Biology)



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Ms. Betsy Nicholson
Federal co-lead for Northeast regional ocean planning
NOAA Ocean Service
Northeast Regional Office
55 Great Republic Drive
Gloucester, MA 01930-2276

July 25, 2013

Re: Draft Goals for Northeast Regional Ocean Planning

Dear Northeast Regional Planning Body:

The Maine Coast Fishermen's Association (MCFA) is pleased to provide comments to the Northeast Regional Planning Body (RPB) regarding its Draft Goals for Regional Ocean Planning in New England. The MCFA is a fishermen-led non-profit organization that identifies and fosters ways to restore the fisheries of the Gulf of Maine and sustain Maine's iconic fishing communities for future generations. The MCFA provides support to the Maine Coast Community Sector. As stewards of the marine ecosystem, MCFA fishermen promote the ecological and financial sustainability of the fishery through balancing the needs of the current generation of fishermen with the long-term environmental restoration of the Gulf of Maine.

As such, MCFA strongly supports the inclusion of commercial fishermen, both current and those who have worked on the water, throughout the development of a comprehensive, ecosystem-based regional ocean plan. Fishermen working in the Gulf of Maine have some of the most relevant information and comprehensive understanding of how the fish resource utilizes the ocean. The Gulf of Maine ecosystem and marine resource is vital to our state and coastal community economies. We support creating a path forward for making informed, resourceful decisions about multiple uses in the ocean, but must emphasize the importance of examining uses of the ocean by fishermen both currently and historically. Uses that involve biological resources are dynamic, and we would caution against developing a process that draws permanent lines in the ocean and instead suggest maintaining some flexibility as these plans evolve.

In broad terms, we support the intent of the draft goals developed by the Northeast Regional Planning Body. We provide the following brief comments regarding the three goals:

Goal: Effective Decision Making

Improve management effectiveness, intergovernmental decision making, engagement, collaboration, and integration of best available knowledge. Reflect ever-changing social, environmental, and technological conditions.

Throughout the planning process, it will be very important to have iterative communication with fishermen and members of fishing industry. As specific options, alternatives, or decisions are developed, obtaining specific input regarding these actions will be essential to coming to workable solutions. Involving commercial fishermen at timely and relevant moments in the process will help ensure that a meaningful stakeholder engagement process is an essential component of Regional Ocean Planning in New England. Fishermen can provide some of the best available information regarding fishing efforts, distribution of fish stocks throughout the ecosystem, and have a historical record of where and when various fish stocks were caught. Involving fishermen throughout the planning process will strengthen this goal.

Another potential action listed under this goal is to *increase interagency coordination across management and regulatory programs*. MCFA believes that communities in New England would benefit from increased coordination to address regional issues thereby reducing the need for repetitive public participation where the same information is shared time and again.

Goal: Healthy Ocean and Coastal Ecosystems

Develop a planning framework to protect, restore, and maintain healthy ocean and coastal ecosystems that provide social, cultural, spiritual, and economic benefits.

Account for changing environmental conditions and new information as it becomes available. Respect the intrinsic value of the ocean, its biodiversity, and act as its steward/caretaker, recognizing humans as part of the ecosystem.

As stewards of the Gulf of Maine ecosystem, MCFA and the fishermen we work for support the intent of this goal. The health of the ecosystem and the marine resource is paramount to having healthy, economically viable fishing businesses and fishing communities along the coast of Maine. We support the intent of accounting for dynamic changes in the system that may result in spatial changes of ocean uses. Sectioning off parts of the ocean in perpetuity is quite concerning to fishermen as fish populations move within the ecosystem. We encourage the planning body to allow for flexibility if or when defining certain areas for uses as fishing efforts and the organisms of the ocean may shift spatially in the future.

Goal: Compatibility Among Past, Current and Future Ocean Uses

Develop a planning framework to encourage compatibility among past, current and future uses of ocean and coastal waters while minimizing user conflict and impacts to environmental and cultural resources. Recognize local priorities and the connection of ocean uses and the ecosystem to shoreside infrastructure and activities. Facilitate

increased understanding and coordination among stakeholders, recognizing the difficulty of resolving certain conflicts.

The specific consideration of commercial fishing uses in the past, present and future as part of the compatibility of uses assessment is appreciated. We support an integrated and proactive approach to recognizing compatibility or lack thereof among past, current, and future uses of the ocean, and appreciate the inclusion of an assessment of the infrastructure impacts on the marine resource.

Thank you for the opportunity to provide and your consideration of comments on the draft goals. We look forward to working with you throughout the process of developing a regional ocean plan for New England.

Sincerely,



Ben Martens, Executive Director
Maine Coast Fishermen's Association



June 28, 2013

Submitted Electronically

Betsy Nicholson
Federal Co-Lead for Northeast Regional Ocean Planning
NOAA Ocean Service
Northeast Regional Office
55 Great Republic Drive
Gloucester, Massachusetts 01930-2276

RE: Comments on the Draft Ocean Planning Goals

Dear Ms. Nicholson:

The National Ocean Policy Coalition (“Coalition”) is pleased to submit comments on the Northeast Regional Planning Body’s (“Northeast RPB”) draft regional ocean planning goals, potential actions, and outcomes. The Coalition is an organization of diverse interests representing sectors and entities that support tens of millions of jobs, contribute trillions of dollars to the U.S. economy, and seek to ensure that actions under the National Ocean Policy are implemented in a manner that best benefits the National interest, including protection of the commercial and recreational value of the oceans, marine-related natural resources, and terrestrial lands of the United States.

Introduction

Ocean and coastal policies play a critical role in our national, regional, and local economies, national security, culture, health, and well-being. The Coalition supports ocean and coastal policies that serve as mechanisms for job creation, infrastructure revitalization, and economic growth, conserve the natural resources and marine habitat of our ocean and coastal regions, and rely on full utilization of existing programs and well-established authorities that are already in place.

As currently written, the draft Northeast Regional Ocean Planning goal document includes items that could adversely impact existing and future commercial and recreational activities in the Northeast. The Coalition’s comments below address those of the most significance. With this in mind, the Coalition strongly encourages the Northeast RPB to consider the following in all activities it undertakes:

- As a newly-established, non-regulatory body, the Northeast RPB must conduct its affairs in a manner that reflects its non-regulatory function. Decision-making that falls under an existing statutory or regulatory authority of a federal, state, or local agency or planning body should not be preempted by the outcome of the work of this RPB. Such action would blur or dilute existing authorities and mandates. The Northeast RPB should strive to serve as a forum to improve the quality and accessibility of information, thus better informing and expediting effective decision-making under existing statutes and the regulatory regimes they established.

- The Coalition does not support the furtherance of any Northeast RPB efforts that extend beyond this non-regulatory scope—including the development of a new regional ocean plan or planning framework—as ocean planning denotes making decisions on resource values and use. However, to the extent that the RPB develops information to inform regulatory processes, the Northeast RPB must ensure that all its activities are well-informed by a multi-stakeholder process, thoughtfully developed to avoid biased outcomes, and grounded in sound science and quality data. The RPB must conduct its activities in a manner that is consistent with existing legal authorities, and establish clear protocols and standards so as to not be subject to arbitrary processes and decisions which would further complicate regulatory processes or inject regulatory uncertainty. Such outcomes would potentially restrict or preclude commercial and recreational use of ocean, coastal, and other “connected” areas without due process afforded in law.
- To be successful, the Northeast RPB must establish a formal role for commercial and recreational user groups to interact with and provide advice to the RPB (including but not limited to the creation of a formal advisory committee under the Federal Advisory Committee Act) before moving forward. The activities of the RPB should be held to the same stakeholder processes and standards as those accorded to normal ocean use planning processes under regulatory authorities. A clear, transparent, and inclusive process would significantly decrease the likelihood of poorly-informed actions that unnecessarily constrain commercial and recreational activity in the Northeast.

Timeline

Efforts to increase regulatory efficiencies and develop a greater understanding of ocean and coastal resources and existing and potential future uses can be of great benefit. However, the Coalition is concerned that the Northeast RPB is moving forward in a manner that lessens the likelihood for a thoughtful and well-informed outcome. According to the planning timeline that was recently approved, Northeast RPB products and outcomes are to be submitted to the National Ocean Council by 2015.¹ To that end, in seeking public comments on the draft goals, the Northeast RPB also asks for feedback on priority outcomes and actions over the next two years.

Rather than establishing pre-determined deadlines for the completion of unknown RPB activities, timelines should be developed based on the time that is needed to identify, consider, and implement goals and any related actions that are ultimately agreed upon following significant user group and public engagement efforts. Practical and achievable timelines cannot be ascertained before such engagement has taken place and such goals and related actions have been identified.

Newly-established non-regulatory entities such as the Northeast RPB must ensure that their activities are well-informed, thoughtfully developed, grounded in sound science and quality data, conducted in a manner that is consistent with existing legal authorities, and not used to arbitrarily and further complicate regulatory processes or inject regulatory uncertainty that would restrict or preclude commercial and recreational use of ocean, coastal, and other “connected” areas.

The Coalition’s comments below address those concerns of the most significance.

Draft Goal One: Effective Decision-Making

¹ See Northeast Regional Ocean Planning Timeline: 2012-2015, available at <http://www.northeastoceancouncil.org/comment-on-the-draft-ocean-planning-goals/>.

*"Improve management effectiveness, intergovernmental decision making, engagement, collaboration, and integration of best available knowledge. Reflect ever changing social, environmental, and technological conditions."*²

Effective decision-making is a laudable goal. Better coordination across governmental agencies, user group engagement, collaboration, and a science-based approach could yield positive benefits, particularly for sectors in the Northeast such as the fishing industry that are already facing federal regulations that are said to be flawed and adding to continued economic headwinds and uncertainty.³ However, Northeast RPB efforts intended to improve the effectiveness of ocean and coastal decision-making could foster regulatory inefficiencies rather than reduce them. Current federal law provides clear jurisdictional leads for leasing, permitting, and licensing of offshore activities. Environmental impact assessment and mitigation is also clearly provided for in the National Environmental Policy Act, the Marine Mammal Protection Act, and the Endangered Species Act. The Northeast RPB should serve as a forum to expedite decision-making under these statutes and the regulatory regimes they established and not dilute or blur existing authorities and mandates.

Similarly, the number of various governmental entities with vastly divergent jurisdictions and responsibilities that currently serve on the Northeast RPB underscores the need for this body to avoid the introduction of new regulatory hurdles, ambiguities, or uncertainties that would frustrate or delay government decision-making within or between Northeast RPB agencies and unnecessarily restrict existing and potential future commercial and recreational activities in the Northeast.⁴

*Draft Goal One Potential Action: "Incorporate regional data and maps into regulatory processes"*⁵

Data and maps that are collected, developed, and used properly can be of great utility to government, scientists, ocean and coastal user groups, and the public. However, the draft potential action to apply regional data and maps in the regulatory context raises concerns. While the Northeast RPB notes in its Charter that it "is not a regulatory body" and "has no independent legal authority to regulate or otherwise direct federal, state, or tribal entities,"⁶ the incorporation of regional data and maps into regulatory processes could result in impacts similar to the issuance of new regulations. The integration of regional data and maps into the regulatory process is aspirational at this point. If not conducted with great caution and sound scientific methodology, it could lead to unrelated data being combined in a manner that wrongly implies correlation and could promote unjustified precautionary principle protections.

Moreover, data and maps cannot be universally applied to any regulatory process regardless of context. Rather, data and maps must be custom-designed based on the particular need. Generated for one

² See Draft Goals for Northeast Regional Ocean Planning, Page 2, available at <http://northeastoceancouncil.org/wp-content/uploads/2012/11/Draft-Goals-for-Public-Review.pdf>.

³ See Office of the Attorney General of Massachusetts Press Release, "AG Coakley Sues NOAA To Block New Regulations That Threaten Fishing Industry," May 30, 2013, available at <http://www.mass.gov/ago/news-and-updates/press-releases/2013/2013-05-30-noaa-lawsuit.html>; and Gloucester Times, "Lawmakers Tie NOAA Funds To Catch Hikes," December 15, 2010, available at <http://www.glocestertimes.com/fishing/x1666505078/Lawmakers-tie-NOAA-funds-to-catch-hikes>.

⁴ In addition to state and tribal representatives representing Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island, and Vermont, Northeast RPB members include federal officials from agencies as varied as the Departments of Agriculture, Commerce, Defense, Energy, Homeland Security, Interior, and Transportation to the Environmental Protection Agency and Federal Energy Regulatory Commission. See Northeast Regional Planning Body Membership Roster, available at <http://northeastoceancouncil.org/wp-content/uploads/2013/04/Membership-Roster-NE-RPB1.pdf>.

⁵ See Draft Goals for Northeast Regional Ocean Planning, Page 2, available at <http://northeastoceancouncil.org/wp-content/uploads/2012/11/Draft-Goals-for-Public-Review.pdf>.

⁶ See Northeast Regional Planning Charter, Page 1, available at http://northeastoceancouncil.org/wp-content/uploads/2012/11/Charter-without-signatories_FINAL.pdf.

particular purpose, data and maps could be misused and misappropriated in other contexts as a basis for enacting new time and space restrictions for existing uses, and static data and maps could preclude new information on and investments in potential future uses that might otherwise be allowed to occur, causing economic and societal harm for the Northeast region.

Concerns about the impacts of the incorporation of regional data and maps into regulatory processes are compounded by the absence of clear guidance and protocols for the collection and use of such data and maps, as well as the draft goal's call for integrating "best available knowledge" as opposed to relying on sound science. Recent trends in "sue and settle" litigation in areas such as Endangered Species Act listings demonstrate that "best available knowledge" can be used as a proxy to block multiple uses of public lands without an adequate scientific basis.

There are many important and existing efforts in state and federal government agencies to improve data collection and database creation. Such efforts should continue. However, it should also be recognized that, absent express legislative authorization and appropriation, there will not be sufficient resources or methodologies to incorporate regional data and maps into regulatory processes by arbitrary deadlines. Furthermore, efforts to accelerate this activity in the current economy could siphon scarce resources and personnel away from existing governmental activities that are necessary to support existing and potential future ocean and coastal commercial and recreational activities in the Northeast.

Draft Goal One Potential Action: "Conduct regional cumulative impacts analysis utilizing improved environmental and ocean use information and data"

This potential action is also problematic. Among other things, it is unclear how such analysis would be conducted and funded, what it would be intended to measure, and how the analysis would be used and applied. In addition, it appears to closely correspond with the "Regional Assessment" required to be included in a Coastal and Marine Spatial Plan as set forth in the National Ocean Policy.⁸

Therefore, without further clarity on these points, the draft potential action is too vague to provide informed comment on. To the extent that the Northeast RPB nonetheless conducts such an analysis, it must be done in a way that is grounded in real-world data and accurately assesses mitigation measures and the impact of new technology on environmental footprints.

Draft Goal One Potential Action: "Inform and engage the public for better decision making"⁹

This potential action implies that existing mechanisms are insufficient to inform and engage the public on ocean and coastal management issues in the region. Federal laws such as the National Environmental Policy Act, Coastal Zone Management Act, and Administrative Procedure Act already require opportunities for public participation in decision-making pertaining to ocean and coastal activities. To the degree that public engagement on ocean and coastal management can be improved, long-established mechanisms and entities are the appropriate vehicles for doing so.

⁷ See Draft Goals for Northeast Regional Ocean Planning, Page 2, available at <http://northeastoceancouncil.org/wp-content/uploads/2012/11/Draft-Goals-for-Public-Review.pdf>.

⁸ See Page 59, Final Recommendations of the Interagency Ocean Policy Task Force, July 19, 2010 ("The regional assessment...would also include an analysis...of cumulative risks as well as forecasts and models of cumulative impacts.").

⁹ See Draft Goals for Northeast Regional Ocean Planning, Page 2, available at <http://northeastoceancouncil.org/wp-content/uploads/2012/11/Draft-Goals-for-Public-Review.pdf>.

Given that the Northeast RPB has been established and is contemplating actions, however, the Northeast RPB itself must conduct robust, transparent, and continuous public engagement activities to provide opportunities for citizens and those with interests in the Northeast to weigh in. This is an unfortunate circumstance, as utilizing a new entity to inform and engage the public and others could introduce additional confusion and contribute to regulatory fatigue.

Draft Goal One Potential Action: “Coordinate and leverage science, traditional knowledge, and data development to address regional priorities”¹⁰

The utility and success of an effort to use sound science, traditional knowledge, and quality data to address regional priorities depends in part on whether such an initiative truly addresses regional priorities. Regional priorities should be developed and furthered on a collaborative basis with the backing of those who live and work in the Northeast, including the commercial and recreational interests that support jobs and economic activity in the region.

Such an effort must also be informed by sound science and quality data that complies with strict integrity safeguards, protocols, and requirements, as well as socioeconomic data that accounts for the benefits associated with both existing and future potential commercial and recreational uses.

Finally, it is unclear how the Northeast RPB would “address” such regional priorities. The Northeast RPB Charter notes that its products “could include a formal regional ocean plan or a set of deliverables such as improved data, maps and spatial planning tools, or regulatory efficiencies.”¹¹ In addition to the comments above regarding data and maps, the Coalition urges the Northeast RPB to address regional or other priorities through actions that do not involve the development of a formal regional ocean plan.

In addition to potential impacts on human uses, the development of a regional ocean plan could generate significant questions and confusion about its alignment with existing and functioning regulatory structures--including but not limited to those under the Magnuson-Stevens Fishery Conservation and Management Act and National Environmental Policy Act--that already manage use of the coastal and marine environment. If plans would require new interagency actions, reviews, or consultations, it could also lead to real and consequential delays in agency actions for carrying out their responsibilities. In turn, economic activity (and related jobs and revenues) associated with commercial and recreational use of the region’s ocean and coasts could suffer.

Furthermore, as the National Ocean Council has previously noted, development of a coastal and marine spatial plan would require “significant initial investment of both human and financial resources.”¹² At the Northeast RPB’s April 2013 meeting, funding constraints were cited as an obstacle to creating a formal Stakeholder Advisory Committee. If funding and other circumstances are such that the RPB lacks the capacity to establish a formal Stakeholder Advisory Committee, then it seemingly lacks the ability and should not endeavor to undertake the development of a formal regional ocean plan.

The Northeast RPB should conduct its affairs in a manner that reflects its non-regulatory function. Doing so will allow existing agencies and processes through which ocean and coastal management

¹⁰ See Draft Goals for Northeast Regional Ocean Planning, Page 2, available at <http://northeastoceancouncil.org/wp-content/uploads/2012/11/Draft-Goals-for-Public-Review.pdf>.

¹¹ See Northeast Regional Planning Charter, Page 1, available at http://northeastoceancouncil.org/wp-content/uploads/2012/11/Charter-without-signatories_FINAL.pdf

¹² See Final Recommendations of the Interagency Ocean Policy Task Force, Page 43, released July 19, 2010, available at http://www.whitehouse.gov/files/documents/OPTF_FinalRecs.pdf.

responsibilities have been assigned by statute and regulation to address effective decision-making, reduce new potential barriers to permitting and project reviews, and ensure that new actions are not taken that could unnecessarily reduce or remove the benefits associated with commercial and recreational activities.

For example, a Northeast RPB priority action in furtherance of effective decision-making should be to address existing inefficiencies by identifying and cataloging flaws in the current system in terms of regulatory agencies and their ability to work with one another. Information on such inefficiencies would be obtained through robust public and user group engagement, including through public comment periods and close collaboration with existing and future potential ocean and coastal resource users, and shared with those agencies and officials who have the statutory responsibilities for managing ocean and coastal resources.

In addition, the Northeast RPB should create formal mechanisms for formal user group input in the process, including through the creation of a Stakeholder Advisory Committee.

The ultimate outcome should include streamlined permitting and project review, based on comprehensive analyses of agency barriers that currently prevent such streamlining, and not empower new entities with regulatory responsibilities.

Draft Goal Two: Healthy Ocean and Coastal Ecosystems

“Develop a planning framework to protect, restore, and maintain healthy ocean and coastal ecosystems that provide social, cultural, spiritual, and economic benefits. Account for changing environmental conditions and new information as it becomes available. Respect the intrinsic value of the ocean, its biodiversity, and act as its steward/caretaker, recognizing humans as part of the ecosystem.”¹³

Commercial and recreational interests have a direct stake in healthy ocean and coastal ecosystems and support sound, informed, and science-based policies that support them. Indeed, a number of federal laws are already in effect that directly and indirectly address the protection of ocean and coastal ecosystems.

Such laws include the Coastal Zone Management Act, Clean Water Act, Clean Air Act, National Environmental Policy Act, Magnuson-Stevens Fishery Conservation and Management Act, Oil Pollution Act, Endangered Species Act, Marine Mammal Protection Act, Outer Continental Shelf Lands Act, Coral Reef Conservation Act, National Marine Sanctuaries Act, Antiquities Act, and National Historic Preservation Act, among others.

Application of a new “planning framework” to “protect, restore, and maintain” the region’s ocean and coastal ecosystems by the Northeast RPB would be inconsistent with the entity’s acknowledged non-regulatory status and further cloud the regulatory landscape for the Northeast’s existing and future ocean and coastal user community. In addition, the contours of and need for the planning framework have not been defined, and since a new planning framework could consist of new processes, structures, and responsibilities among various agencies, without further clarification it is also unclear how it would be established consistent with existing authorities.

¹³ See Draft Goals for Northeast Regional Ocean Planning, Page 2, available at <http://northeastoceancouncil.org/wp-content/uploads/2012/11/Draft-Goals-for-Public-Review.pdf>.

Concerns about the regulatory impacts of instituting the “planning framework” are underscored by potential actions to “[i]dentify opportunities within existing regulations and authorities for restoration and protection” and “[w]orking within existing regulations and authorities, use publically-accessible maps and trends to define and characterize important, significant, or valuable areas.”¹⁴ In addition, the Northeast RPB notes that a potential outcome of this goal is the incorporation of maps of species, habitats, and areas of regional importance “in existing decision making processes.”¹⁵ Therefore, new regulatory impacts from instituting the planning framework seem likely to occur.

As another potential outcome, the Northeast RPB refers to “[g]reater recognition and understanding of the connection between riverine quality and healthy ocean and coastal ecosystems.”¹⁶ The Coalition encourages the Northeast RPB to leave management of inland resources to existing state and federal bodies and processes. To the extent that the Northeast RPB nevertheless seeks to address upland activities, it is imperative that those who live, work, and employ individuals in such areas be informed and engaged at the earliest possible moment regarding the Northeast RPB’s existence and intention to explore potential supposed links between their areas and ocean and coastal waters.

If the Northeast RPB moves ahead with the development of a planning framework, it must account for changing economic as well as environmental conditions if the region’s ocean and coastal ecosystems are to provide “social, cultural, spiritual, and economic benefits.”

In sum, it is unclear how a new planning framework would support healthy ocean and coastal ecosystems in a different and better way than existing mechanisms, how it would be developed in tandem with existing laws, regulations, and processes, and how it would not hinder existing and future commercial and recreational users of Northeast ocean and coastal areas. Therefore, the Coalition urges the Northeast RPB to allow existing entities, mechanisms, and processes to support healthy ocean and coastal ecosystems.

Draft Goal Three: Compatibility Among Past, Current and Future Ocean Uses

“Develop a planning framework to encourage compatibility among past, current and future uses of ocean and coastal waters while minimizing user conflict and impacts to environmental and cultural resources. Recognize local priorities and the connection of ocean uses and the ecosystem to shoreside infrastructure and activities. Facilitate increased understanding and coordination among stakeholders, recognizing the difficulty of resolving certain conflicts.”¹⁷

For the reasons stated above, the Coalition opposes development of a “planning framework” to address “compatibility among past, present, and future uses of ocean and coastal waters while minimizing user conflict and impacts to environmental and cultural resources.” A number of entities, mechanisms, and processes created by state and federal statutes to address ocean and coastal resource management are already in effect. Establishment of an additional “planning framework” must not become a mechanism that circumvents or obviates the deliberative statutory constructs that currently exist. Furthermore, a new planning framework could have adverse effects on existing and potential future ocean and coastal

¹⁴ See Draft Goals for Northeast Regional Ocean Planning, Page 3, available at <http://northeastoceancouncil.org/wp-content/uploads/2012/11/Draft-Goals-for-Public-Review.pdf>.

¹⁵ See Draft Goals for Northeast Regional Ocean Planning, Page 3, available at <http://northeastoceancouncil.org/wp-content/uploads/2012/11/Draft-Goals-for-Public-Review.pdf>.

¹⁶ See Draft Goals for Northeast Regional Ocean Planning, Page 3, available at <http://northeastoceancouncil.org/wp-content/uploads/2012/11/Draft-Goals-for-Public-Review.pdf>.

¹⁷ See Draft Goals for Northeast Regional Ocean Planning, Page 3, available at <http://northeastoceancouncil.org/wp-content/uploads/2012/11/Draft-Goals-for-Public-Review.pdf>.

commercial and recreational uses in the Northeast without providing added value for environmental or cultural resources.

As with Draft Goal Two, the potential for such a planning framework to result in adverse and perhaps unintended consequences for commercial and recreational ocean and coastal uses in the region is highlighted by several potential actions that are included in the draft goal document.

For example, the Northeast RPB states that potential actions to “[i]dentify and map existing uses...and related infrastructure,” “[i]dentify and map cultural and historic sites,” and “[e]nhance the viability of and compatibility among new and existing ocean uses” could help further outcomes including “minimiz[ing] conflicts and informing siting of new uses” and “information for preserving important cultural and historic sites and traditions.”¹⁸ It is unclear how such actions and outcomes would not result in new commercial and recreational access limitations or conditions.

As another potential outcome, the Northeast RPB refers to “[g]reater recognition and understanding of the connection between inland resource use and associated impacts on ocean resources.”¹⁹ To the degree that the Northeast RPB intends to address inland activities, those who live or operate in the region’s inland areas should be informed of such intentions and provided with adequate engagement opportunities.

To be sure, certain potential actions under this draft goal may yield positive results. For example, assessing trends in maritime commerce, commercial fishing, and ocean-based renewable energy, as well as assessing the potential for offshore aquaculture, current and foreseeable uses of seafloor material, and existing shore-side infrastructure and related improvement needs could be beneficial. Any such assessments should be expanded to include all ocean and coastal resources and potential future uses, and they should be properly scoped and defined to meet regional goals and priorities developed through broad stakeholder consensus.

If not used as a building-block to construct a new regulatory layer, these assessments could improve the region’s ocean and coastal economy and environment by helping to further potential outcomes such as a more complete and thorough “[a]ssessment of the regional coastal and ocean economy,” “[c]onsideration of regional infrastructure needs,” and “[i]dentification of priority needs for shoreside infrastructure upgrades.”²⁰

However, if the information is used in a way that has the ultimate effect of introducing new uncertainties for existing and potential future commercial and recreational interests in the Northeast by introducing new and unnecessary regulatory hurdles or obstacles to access, the outcome for the region could be far different.

As with Draft Goal Two, the Coalition urges the Northeast RPB to allow existing entities, mechanisms, and processes to govern the multiple ocean and coastal uses that exist rather than develop a new “planning framework.”

¹⁸ See Draft Goals for Northeast Regional Ocean Planning, Pages 3 and 4, available at <http://northeastoceancouncil.org/wp-content/uploads/2012/11/Draft-Goals-for-Public-Review.pdf>.

¹⁹ See Draft Goals for Northeast Regional Ocean Planning, Page 3, available at <http://northeastoceancouncil.org/wp-content/uploads/2012/11/Draft-Goals-for-Public-Review.pdf>.

²⁰ See Draft Goals for Northeast Regional Ocean Planning, Page 3, available at <http://northeastoceancouncil.org/wp-content/uploads/2012/11/Draft-Goals-for-Public-Review.pdf>.

In the event that the RPB pursues development of a planning framework, it is essential that the whole host of all existing and potential future commercial and recreational uses is fully accounted for, addressing the needs of, among others, the commercial fishing industry, needs for current and future maritime transportation routes, the concentration of and potential for recreational fishing and boating, the opportunity and need for offshore renewable energy, the possibility of the existence of offshore conventional energy and strategic mineral resources, the need for future energy infrastructure such as pipelines, transmission corridors, power plants, and refineries, and the needs of the aquaculture industry.

Furthermore, any Northeast RPB effort to develop and implement an ecosystem-based plan or planning framework will require adjustments to its anticipated schedule for completion. While the RPB activity timeline notes that by 2015 it will have achieved implementation with ecosystem-based management,²¹ this timeline must be altered if the RPB's actions are to be grounded in sound science and data.

At the present state of knowledge, practical experience with the design and implementation of monitoring programs that enable ecosystem-based management is limited, especially on the broad spatial and temporal scales that are required to support informed ocean and coastal planning decisions.

Therefore, significant thought and time must be invested in developing data collection, monitoring, and analysis methodologies that can deliver reliable and sound information. In addition, effective data gathering and monitoring require that the goals of any ecosystem-based management effort first be collectively defined through public processes. Until stakeholders understand what the planning framework or plan will look like and what associated efforts for ecosystem-based management are supposed to achieve, it will be difficult to determine how to efficiently and effectively approach and fund critical data collection and management efforts.

To that end, a concrete proposal specific to the Northeast must be developed which outlines the envisioned goals of ecosystem-based management and efforts associated with data collection, quality control, analysis, and interpretation. Furthermore, since "scientific" information could be used in attempts to influence public perception, the plan must also provide mechanisms to ensure the scientifically sound use of the obtained information.

At a minimum, the proposal should include the following:

- A statement outlining the goals and objectives envisioned for ecosystem-based management, as determined by the stakeholder community through public processes;
- Data collection and measurement programs outlining which parameters (variables) should be monitored, for what purpose, how, where, and how often;
- Protocols for data quality control to ensure measurements are technically defensible and bound by acceptable uncertainty limits before they are released for analysis, model input, and interpretation; and
- Protocols outlining the anticipated use of the information to ensure the application of scientifically proven analysis methods and the dissemination of peer-reviewed, statistically sound information

²¹ See Northeast Regional Ocean Planning Timeline: 2012-2015, available at <http://www.northeastoceancouncil.org/comment-on-the-draft-ocean-planning-goals/>.

An initial proposal that addresses these points should be finalized before a detailed assessment is made of the resources needed for its implementation, including, for example, sampling equipment, laboratories, and marine vessel requirements.

In addition, the Northeast RPB must ensure that all impacted stakeholders, including the Northeast commercial and recreational user community, buy in to the initiative and are involved and committed at every stage of the process: the identification of goals, the development and design of effective monitoring programs, the implementation of such programs on cross-sectoral scales, the continuous analysis of data outflow, and the alignment of adaptive management techniques with the observations.

In addition, defining and realizing realistic and achievable monitoring efforts, and identifying actual versus perceived problems, will require that qualified local scientists and scientific experts from industry stakeholders are brought in to work together with Northeast RPB representatives.

Therefore, a regional ocean planning framework, plan, or other actions dependent on ecosystem-based management must not be implemented before the pertinent data is appropriately collected, analyzed, and made publicly available. Such activities will take time, and their completion would be constrained by the imposition of arbitrary deadlines.

Lastly, any observing, mapping, and other data collection activities carried out must recognize limits in the ability of maps and forecasting/modeling tools to account for variations in conditions across geographic areas and reflect differences in operations among specific activities and users. Such activities should also have the ability to adapt to new information about ecosystems, alternative uses of ecosystem resources and services, and economic activities that drive quality of life in the region.

CONCLUSION

While the Coalition appreciates the opportunity to provide comments on the draft goals for Northeast regional ocean planning, additional information is needed to allow all those with interests in the region to provide the Northeast RPB with informed comments.

In addition, structural mechanisms that provide a formal means for commercial and recreational interests and local officials to adequately interact with and advise the Northeast RPB on its potential future activities should be in place before the Northeast RPB moves any further ahead.

Especially during these difficult economic times, it is essential that the output of the Northeast RPB reflects the needs and desires of those who live and employ citizens of this region, be developed in a thoughtful, transparent, and deliberate manner that is based on realities on the ground rather than artificial timelines, and not lead to the creation of new and unnecessary obstacles to access for existing and future commercial and recreational activities that provide economic and societal benefits for the region. The Coalition looks forward to working with the Northeast RPB to help ensure such an outcome.

Sincerely,



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July 26, 2013

Ms. Betsy Nicholson
Federal Co-Lead for the Northeast Regional Planning Body
National Oceanic and Atmospheric Administration Ocean Service
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Gloucester, MA 01930

Submitted electronically

Dear Ms. Nicholson,

On behalf of the Natural Resources Defense Council (NRDC) and our more than 1.3 million members and online activists, thank you and the other members of the Northeast Regional Planning Body (RPB) for the opportunity to comment on the draft goals for the Northeast's regional ocean planning.¹ One reason NRDC so strongly supports regional ocean planning is the opportunity it offers states and tribes, together with the public, to engage more directly and have a greater voice in ocean and coastal decisions. Our ocean is a public resource and its many users – from surfers to fishermen, from small business owners to conservationists – need to be part of developing a responsible road map to guide the ocean's future use. We congratulate the Northeast RPB on its willingness to develop these draft goals in close coordination with the public through hosting several public meetings and by offering the option of submitting comments online.

As was stated at the Connecticut public meeting, NRDC agrees with the ocean planning goals and the potential outcomes and actions circulated for comment and, in particular, supports the healthy ocean and coastal ecosystems goal to:

Develop a planning framework to protect, restore, and maintain healthy ocean and coastal ecosystems that provide social, cultural, spiritual, and economic benefits. Account for changing environmental conditions and new information as it becomes available. Respect the intrinsic value of the ocean,

¹ Available at <http://northeastoceancouncil.org/wp-content/uploads/2012/11/Draft-Goals-for-Public-Review.pdf>.

its biodiversity, and act as its steward/caretaker, recognizing humans as part of the ecosystem.

This goal should underlie all of the RPB's planning efforts, as only a healthy ocean can continue to provide the food, jobs and recreation we want and need. New England's ocean resources support more than 200,000 jobs, with the tourism and recreation sector representing more than 70 percent of these.² In 2011, nearly 1.3 million recreational anglers took 6.1 million fishing trips in New England.³ This employment and enjoyment rely on clean coastal waters and beaches and healthy and abundant fish and wildlife. New England's valuable ocean waters are already struggling with serious problems, like pollution, destruction of productive marine habitats, climate change and ocean acidification; it is critical that we do not overwhelm the natural system's ability to properly function and provide for us.

In order to achieve this goal of a healthy ocean and coasts, we encourage the RPB to add as a specific action conducting a regional assessment of the area's ecosystem, as is called for by the *Final Recommendations of the Interagency Ocean Policy Task Force*.⁴ A regional assessment should discuss the Northeast's important ocean features, such as the type and location of seafloor habitats, and describe ocean wildlife populations of native, threatened, and endangered species, including an assessment of the species' health. The RPB should work with the National Oceanic and Atmospheric Administration and other scientific partners and federal agencies to develop this regional ecological assessment. The assessment should also calculate the impacts that ocean use – from existing uses like shipping to anticipated uses like offshore renewables – bring to the system.

The RPB should also develop a science-based methodology to help identify and protect important ecological areas, advised by the regional assessment. This work to select and protect the most critical *ecological* areas should be called out explicitly, as it is not clear whether or not it is folded within the actions of "Working within existing regulations and authorities, use publically-accessible maps and trends to define and characterize important, significant, or valuable areas" and "Identify opportunities within existing regulations and authorities for restoration and protection." To the extent of their existing authorities, federal agencies and states and tribes should take steps to safeguard the areas and ecosystem processes important for spawning, breeding, feeding and migrating ocean fish and wildlife and ensure that the various impacts of ocean uses – alone and in concert – do not threaten the natural

² National Oceanic and Atmospheric Administration. ENOW Data 2010. Available at <http://www.csc.noaa.gov/ENOWDataWizard/index.jsp?RegionList=5&vYears=2010>. Please note that employment numbers and percentage of jobs due to tourism and recreation and living resources would be higher if the data accounted for the self-employed. Jobs numbers include part-time and seasonal employees.

³ National Marine Fisheries Service. 2012. *Fisheries Economics of the United States, 2011*. Available at <http://www.st.nmfs.noaa.gov/Assets/economics/documents/feus/2011/FEUS%202011-Revised.pdf>.

⁴ See, for example, page 59: "The regional assessment would include: relevant biological, chemical, ecological, physical, cultural, and historical characteristics of the planning area; ecologically important or sensitive species/habitats/ecosystems; and areas of human activities. The assessment would also include an analysis of ecological condition or health and of cumulative risks as well as forecasts and models of cumulative impacts. The regional assessment would explain the information obtained and analyses conducted during the planning process and how they were used to help determine management decisions and plan alternatives." Available at http://www.whitehouse.gov/files/documents/OPTF_FinalRecs.pdf.

system's health or the variety of uses (*e.g.*, surfing, boating, fishing, paddling, bird watching) that depend on these resources.

Ensuring public participation throughout the planning process will help secure a final ocean plan which reflects the region's values and is viable over the long term. In addition to continuing to provide meaningful opportunities for public comment, we strongly urge the RPB – perhaps as an action to advance the goal of effective decision making – to develop a regional stakeholder advisory panel made up of representatives from traditional, current, and emerging ocean uses in New England. This panel would provide regular input and advice to the RPB and would serve as a formal mechanism for the RPB to solicit feedback from stakeholders. We also urge you to establish a science advisory panel comprised of academics and subject matter experts working throughout the region to advise the RPB on technical matters and to provide advice at all stages of the planning process.

Thank you for your consideration of these recommendations and for all of your efforts to develop a blueprint to guide smart development of our ocean resources. We appreciate your dedication to this important work and look forward to continuing to comment at all stages of this process.

Sincerely,



Ali Chase
Policy Analyst
Natural Resources Defense Council

August 2, 2013

Mr. Richard Getchel, Tribal Co-lead
Mr. Grover Fugate, State Co-lead
Ms. Betsy Nicholson, Federal co-lead for Northeast Regional Ocean Planning
NOAA Ocean Service
Northeast Regional Office
55 Great Republic Drive
Gloucester, MA 01930-2276

Submitted via regular mail and email (Katie Lund, RPB Executive Secretary, katie.lund@noaa.gov)

Dear Mr. Getchel, Mr. Fugate and Ms. Nicholson:

On behalf of The Nature Conservancy (the Conservancy), please accept the following comments on the Northeast Regional Planning Body (RPB) draft regional ocean planning goals. The Conservancy supports the RPB in its efforts to establish clear goals for ocean planning in the Northeast and appreciates the opportunity to provide additional input.

The Conservancy's mission is to conserve the lands and waters on which all life depends. With the support of more than one million members, the Conservancy has protected over 120 million acres and 5,000 river miles around the world and currently has more than 150 marine conservation projects in 32 countries and in every coastal state in the U.S. The Conservancy has been working to conserve, protect, and restore coastal and marine habitats and species along the U.S. Atlantic Coast for over four decades. The Conservancy supports all three goals and related objectives developed by the RPB. Effective decision making, supporting healthy ocean and coastal ecosystems and compatibility among past, current and future ocean uses, all are important to promote conservation of coastal and ocean natural resources. The comments that follow reflect more specific recommendations for each of these goals.

Goal 1 - Effective decision making. The Conservancy encourages the RPB to consider appointing science and stakeholder advisory groups to inform your planning process. We also suggest adopting an open and inclusive public process as you proceed. This may include:

- Keeping meeting minutes and accessible public records.
- Providing access to work and decision documents well in advance of meetings.
- Providing generous notice of RPB, advisory body and other public meetings.
- Encouraging interaction between RPB members and members of the public offering comments.
- Using *ad hoc* working groups to inform discussion around certain issue areas.

As described in the RPB's document entitled "Draft Goals for Northeast Regional Ocean Planning", the Conservancy suggests that "conducting regional cumulative impacts analysis utilizing improved environmental and ocean use information and data" should be one of the RPB's priority actions. Over the last several years many partners in the Northeast region have created a solid foundation for better understanding of the combined effects of multiple human uses on natural resources. Building on this work will provide ocean planners and stakeholders with essential information and tools for eyes wide open decision making.

Goal 2 - Healthy ocean and coastal ecosystems. The Conservancy suggests that the RPB's draft goal of "achieving greater recognition and understanding of the connection between riverine water quality and healthy ocean and coastal ecosystems" should be a priority action. As you heard from many of our state chapter staff throughout the region during the public hearing process, the Conservancy has invested heavily along with state and federal partners, to restore ecological function in many places important to the RPB. We look forward to continuing this work and partnering with the RPB to become even more strategic in our restoration work so that our shared efforts for the benefit of natural systems can be even greater. Given the degraded state of many natural systems and marine species which are struggling to persist in the Northeast, the Conservancy strongly supports including restoration as a priority objective to achieve healthy ocean and coastal ecosystems. Shellfish and eelgrass enhancement projects led by the Conservancy in all of the Northeast states demonstrate how restoration can be a critical activity for building resilient coasts.

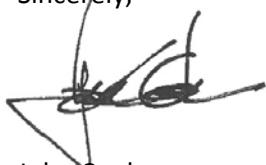
Goal 3 - Compatibility among past, current and future ocean uses. The Conservancy supports the RPB's draft goal of "developing a planning framework to maximize compatibility among past, current and future uses of ocean and coastal waters while minimizing user conflict and impacts to environmental and cultural resources" as a priority action. Better assessments and maps showing both compatibility between different human use types and between human uses and marine ecosystems will help planners and stakeholders to work together to craft plans that balance multiple interests. As you advance assessment and mapping of compatibility and cumulative impacts, we encourage you to incorporate information on climate change impacts and trends so the region can effectively develop adaptive responses. This will be essential to sustaining the region's ecosystem dependent human uses and cultural values into the future.

The Conservancy recognizes the value of integrating existing sub-regional and state-based ocean planning work by the RPB, as it has with Rhode Island and Massachusetts. We recommend that the RPB adopt a similar approach to emerging planning efforts for Long Island Sound as well as adjacent coastal waters off Connecticut and New York to provide for consistent and seamless integration throughout the Northeast region and with the Mid-Atlantic.

Lastly, the Conservancy strongly supports the RPB in developing a concise overarching *mission and vision*. This action will help the RPB achieve your ultimate goals, while explaining to the broader public the importance of ocean planning to everyone in the Northeast region.

Thank you again for the opportunity to comment on the RPB draft goals and for your important work to advance ocean planning in the Northeast.

Sincerely,



John Cook
Managing Director
Eastern US Division, North America Region

PO Box 7041
Gloucester, MA 01930
July 26, 2013

Betsy Nicholson, NOAA and RPB Federal Co-Lead

Dear Betsy,

I am writing to report briefly on the Public Forum on Ocean Planning held in Gloucester on July 24th. I am aware that a number of citizens have also submitted individual comments by the July 26th deadline. As I suggested at the RPB meeting in Narragansett and in my follow-up letter, the Port of Gloucester looks forward to ongoing conversations with the RPB, as we continue to educate ourselves and explore the ocean planning framework.

The following basic concerns have been made about the work of the RPB to date:

- The RPB has not been clear about likely outcomes of its work – to what ends are mapping exercises, greater agency coordination, and compatibility analysis being put? The goals sound admirable, but are vague and without practical content. Where is this all headed? What is the intended or likely future of the ocean, based on this ocean planning process?
- The basis for decisions about permits for new uses of the ocean have not been explained – will “tradeoff analysis” and ocean maps be tools just to introduce a wide range of potentially problematic new uses in the ocean, without precautionary and balanced consideration of impacts on the ocean ecosystem, traditional uses, and the well-being of coastal communities and the public?
- Will “maximization of profits” and “privatization” of the ocean be the inevitable result of this process? Simplistic applications of resource economics methodologies on land have supported industrial-scale extraction, corporate commodification, income inequality, species loss, and pollution. Is this the likely path forward for the ocean as well?
- Public participation has been inadequate. It is inaccurate to suggest that extensive ENGO and user group participation has represented genuine deliberative and democratic input in the process. What will be done going forward to organize a genuine public education and engagement process?

Affirmatively, the community of Gloucester has articulated these themes:

- Establish “Healthy Ocean and Coastal Ecosystems” as the overarching goal of the planning framework – nature must be protected if it is to provide social, cultural, spiritual and economic benefits to future generations. Establish strong standards and guidelines for traditional and new uses that will assure the protection of the ocean. Emphasize research to understand threats to

- ocean health, clean-up projects, adaptive management, and clean methods of resource harvesting.
- Assert the primacy of the provision of healthy food from the ocean biomass and protect and promote the traditional commercial fishing industry.
- Maintain and strengthen the working relationships of coastal communities with the ocean, including the ongoing development of innovative and sustainable approaches to resource management and use.
- Explore different models of managing and utilizing the natural resources of the ocean, in particular those that rest in nature's capacity to generate multiple renewable resources and benefits, including restoration of ocean health
- Explore related models of governance and ownership
- Organize a genuine public process that informs and engages citizens and communities whose voices have not yet been heard

Gloucester looks forward to continued conversations with the RPB. Thank you for your review of this brief update.

Sincerely,

Valerie I. Nelson



New England Fishery Management Council

50 WATER STREET | NEWBURYPORT, MASSACHUSETTS 01950 | PHONE 978 465 0492 | FAX 978 465 3116

C.M. "Rip" Cunningham, Jr., *Chairman* | Thomas A. Nies, *Executive Director*

July 16, 2013

Ms. Betsey Nicholson, Federal Co-Lead
Mr. Grover Fugate, State Co-Lead
Chief Richard Getchell, Tribal Co-Lead
Northeast Regional Planning Body
Northeast Regional Office
55 Great Republic Drive
Gloucester, MA 01930-2276

Dear Ms. Nicholson, Mr. Fugate, and Chief Getchell:

Mr. Douglas Grout, the New England Fishery Management Council representative to the Northeast Regional Planning Body (NERPB), indicated that on occasion the NERPB may need to contact fishing industry stakeholders for feedback. I am pleased to offer the use of the Council's Advisory Panels (APs) for that purpose, on an as-available basis. Please send requests to use the APs to both me and Doug.

The APs are generally organized according to fishery (sea scallops, groundfish, monkfish, etc.) and most members are from the fishing industry or environmental organizations. While we will not be able to schedule a meeting solely to address NERPB issues, we will make every effort to provide an opportunity for the NERPB to discuss issues with the APs during scheduled meetings. The APs meet periodically but are not on a fixed schedule; meetings are announced in advance on our web page. Comments received should be interpreted as coming from individual members and should not be considered a statement of Council policy.

We look forward to strengthening our commitment to the RPB with this relationship. Please contact me if you have questions.

Sincerely,

Thomas A. Nies
Executive Director

cc: Mr. Douglas Grout, New Hampshire Fish and Game
Mr. John Webber, Northeast Regional Ocean Council
All NEFMC Advisory Panel chairs and vice-chairs



July 26, 2013

Submitted electronically via <http://northeastoceancouncil.org/comment-on-the-draft-ocean-planning-goals/>.

Re: Draft Goals for Northeast Regional Ocean Planning

Dear Northeast Regional Planning Body:

The New England Ocean Action Network (NEOAN) is pleased to provide comments to the Northeast Regional Planning Body (RPB) regarding its Draft Goals for Regional Ocean Planning in New England. NEOAN is a diverse group of ocean users and stakeholders which was created in 2011 to ensure that all ocean users groups have the opportunity to be fully involved in the development of a regional ocean plan in New England. We are working to promote and support an open, transparent, stakeholder driven ocean planning process that is based in sound science and ensures coordination between state and federal entities. NEOAN strongly supports the development of a comprehensive, ecosystem-based regional ocean plan as an essential mechanism for ensuring that New Englanders have the information, knowledge, and tools they need to make informed decisions to keep our ocean and coasts healthy and our coastal economies thriving. We also strongly support the development of a regional ocean plan as an essential mechanism for implementing the goals and priorities of the National Ocean Policy.¹

NEOAN commends the RPB for its careful development of the three goals as well as the accompanying potential outcomes and actions. In principle, NEOAN agrees with the selection and content of these three goals and we believe that if the subsequent implementation is equally as thoughtful, they will lay the foundation for the creation of a framework that will support the development of a more integrated and sustainable approach to ocean management.

We provide the following brief comments regarding the three goals:

Goal: Effective Decision Making

Improve management effectiveness, intergovernmental decision making, engagement, collaboration, and integration of best available knowledge. Reflect ever-changing social, environmental, and technological conditions.

¹ Executive Order 13547, Stewardship of the Ocean, Our Coasts and the Great Lakes. Fed. Reg. 43023. Thursday, July 22, 2010.

Embedded in the language of this goal is to *reflect ever changing environmental conditions in the decision making process*. NEOAN recommends that the RPB develop specific actions to address the reality of changing ecosystems as a result of climate change, ocean acidification, and ocean warming in the Regional Ocean Planning process.

A potential action listed under this goal is to *inform and engage the public for better decision making*. NEOAN's top priority is to ensure that a meaningful stakeholder engagement process will be an essential component of Regional Ocean Planning in New England and thus recommends that this action item be of top priority. We refer the RPB to the detailed recommendations submitted to the executive committee of the RPB by NEOAN on Friday, June 13. We would like to reinforce one of the proposals in that letter:

- Appoint a *Regional Stakeholder Advisory Panel* which consists of diverse representation from the range of traditional, current and nascent ocean user groups in New England. We do not believe that utilizing existing state advisory panels is an appropriate way to encourage a crosscutting regional dialogue about a large, regional planning area. State by state advisory committees can be engaged at the discretion of individual states, but we believe strongly that the RPB should create and engage its own regional advisory panel.

NEOAN commends the RPB for its early and extensive public outreach in this process and in particular for conducting a series of 10 public meetings across New England to facilitate public comment on the Draft Goals. However, we encourage the RPB to continue to refine its outreach strategies with stakeholder groups to ensure a more comprehensive involvement from the public and diverse ocean user groups. As the RPB develops a stakeholder engagement plan, NEOAN recommends that the RPB also seek feedback on the efficacy and usefulness of the outreach strategies and tools.

Another potential action listed under this goal is to *increase interagency coordination across management and regulatory programs*. NEOAN believes that communities in New England would benefit from increased coordination to address regional issues by reducing the need for repetitive public participation where the same information is shared time and again.

Goal: Healthy Ocean and Coastal Ecosystems

Develop a planning framework to protect, restore, and maintain healthy ocean and coastal ecosystems that provide social, cultural, spiritual, and economic benefits. Account for changing environmental conditions and new information as it becomes available. Respect the intrinsic value of the ocean, its biodiversity, and act as its steward/caretaker, recognizing humans as part of the ecosystem.

Pursuant to Section 1 of Executive Order 13547², NEOAN recommends that the RPB make explicit in the actions and potential outcomes for this goal the principles of Ecosystem Based Management; a place-based approach to natural resource use that aims to restore and protect the health, function, and resilience of entire ecosystems for the benefit of all organisms, including humans. The principle of Ecosystem-Based Management is fully expressed in the *Final*

² Executive Order 13547, Stewardship of the Ocean, Our Coasts and the Great Lakes. Fed. Reg. 43023. Thursday, July 22, 2010.

*Recommendations of the Ocean Policy Task Force*³ and the RPB's use of that language as a guide is fully appropriate.

Goal: Compatibility Among Past, Current and Future Ocean Uses

Develop a planning framework to encourage compatibility among past, current and future uses of ocean and coastal waters while minimizing user conflict and impacts to environmental and cultural resources. Recognize local priorities and the connection of ocean uses and the ecosystem to shoreside infrastructure and activities. Facilitate increased understanding and coordination among stakeholders, recognizing the difficulty of resolving certain conflicts.

Successful completion of the activities and subsequent outcomes of the first listed goal, *effective decision making*, will facilitate a more integrated and proactive approach to ocean management including goal three; recognizing compatibility or lack thereof among past, current, and future uses of the ocean. NEOAN recommends that the RPB not only focus on compatibility of uses but also the cumulative impact of uses on ecosystems.

Thank you for your kind consideration of these recommendations. We encourage you to visit our website at <http://newenglandoceanaction.org/> to learn more about the New England Ocean Action Network and we look forward to working with you to advance a regional ocean plan for New England.

Sincerely,
NEOAN

³ United States. White House Council on Environmental Quality. *Final Recommendations of the Interagency Ocean Policy Task Force*. 2010. Web. <http://www.whitehouse.gov/files/documents/OPTF_FinalRecs.pdf>.

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Science Coordinator

Brett Tolley
Community Organizer

Cynthia Bush
Finance Coordinator & Program Associate



July 26, 2013

Northeast Regional Planning Body Northeast Regional Ocean Council

RE: Draft Goals for Northeast Regional Ocean Planning

Dear members:

The Northwest Atlantic Marine Alliance (NAMA), headquartered in Gloucester MA, submits the following comments in support of northeast fishermen and their families, coastal communities, consumers of wild New England seafood, and others concerned about the health and productivity of Northeast marine ecosystems., since this planning is NAMA's mission is to restore and enhance an enduring marine system supporting a healthy diversity and an abundance of marine life and human uses through a self-organizing and self-governing organization. We appreciate the opportunity to comment on the *Draft Goals for Northeast Regional Ocean Planning*.

1. Overview

We find that the draft includes many important considerations. We generally support the first two Goals and associated outcomes and actions, with the modifications and additions indicated in our ensuing comments.

There are certain overarching ideas that we feel are missing from the document and we hope the final draft will include and give more prominence to the following:

- The critical role of the ocean in our local and regional food systems has been largely ignored.
- There is no accommodation for decisions to prohibit activities that are known to be or likely to be harmful to marine

ecosystems, even though such prohibitions are a part of the legal and historical background of ocean planning in this country.

- There is no specific recognition that in cases of potentially conflicting uses, healthy ecosystems and living natural resources must take precedence over other uses, regardless of monetary value.
- The fundamental importance and difficulty of comprehensive resource monitoring and mapping—composition, accuracy, and regular updating—have been underplayed; and as a consequence....
- ...the draft neglects the importance of uncertainty and fails to prescribe precautionary decision-making and how to implement it.
- The distinction between and importance of both short-term and long-term effects and outcomes should be spelled out.
- **The third goal needs major rethinking and revision, and should focus on the compatibility of ocean planning and ocean uses with healthy coastal and ocean ecosystems and coastal communities** (and not on making all possible uses of the ocean compatible with each other).

2. Framing Principles

The framing principles are of course critical to development of a robust and effective marine spatial plan, and we appreciate that they are spelled out and constitute a significant part of this document. They will help future managers and decision makers in the implementation of the goals. We find the draft principles to be fairly comprehensive, but we feel there are a few important omissions. We therefore suggest that you consider possible additional principles and/or additional language in some of the existing principles to incorporate the following :

- The ocean and its resources should be managed as a critical part of our food system, providing a sustainable source of healthy wild seafood.
- Decision makers are obligated to ensure that future generations inherit healthy marine ecosystems.
- In addition to “the ocean and its resources [being] managed for the benefit of the public, now and in the future” (principle #1), it is important to further point out that, to achieve those benefits, management must also benefit living marine ecosystems so they remain capable of supporting living resources and providing services that benefit the public.
- Principle 4 recognizes that new uses of the ocean emerge and old uses change, but it is also essential to recognize that not all existing and proposed uses of the ocean are appropriate, so that some may need to be prohibited, just as the ocean disposal of chemical and radioactive wastes, sewage sludge, and garbage have already been banned.
- Concerns about the deteriorating health of marine ecosystems, as well as deficiencies and uncertainties in data and information, ought to dictate *precautionary* decision-making
- While government efficiency and transparency are certainly crucial (principle #7), it is equally important that the planning process be complete and fair, and not be

driven by one or a few powerful industries; lest, in the name of efficiency, the drivers and the goals become one and the same.

3. Goals, Outcomes and Actions

The organization of the document into separate goals, each with its own list of potential outcomes and actions, is somewhat confusing and needs an introductory paragraph explaining the different categories. For instance, are “potential outcomes” the short-term outcomes of proposed actions or elements of effectively pursuing the goals over the long term? Should they really be called “desired outcomes”? If so, shouldn’t there also be a list or directive to consider potential undesirable outcomes and how to avoid them? The instructions for comments on this document suggested that we focus on the first two years when considering both the outcomes and the actions. This makes some sense for the action list, since first steps are essential and adaptive approaches will redirect actions further down the road. But it makes no sense for outcomes. It is critical to envision as accurately as possible the outcomes of the goals and the actions designed to implement them. Visioning the outcomes will guide decisions about the most appropriate actions and will provide markers by which to judge progress and make adaptive adjustments when necessary.

Goal: Effective Decision Making

“Improve management effectiveness, intergovernmental decision-making, engagement, collaboration, and integration of best available knowledge. Reflect ever-changing social, environmental and technological conditions.”

We suggest adding “adaptive” to the title of the goal since adaptive management is key to effective management over the long term.

The statement of the goal is not as clear as it should be. While a goal to improve management effectiveness sounds good, it is important to indicate what constitutes effectiveness. In addition, the term, “intergovernmental” does not adequately describe the desired decision-making process. Finally, it should be recognized that the “best available knowledge” changes rapidly, so in addition to integration, there is a need for continuous updating and validation; and it is equally important to recognize missing information. A goal statement that is more action-oriented, would be helpful; something like the following:

Goal: Effective and Adaptive Decision-making

Improve management to secure biologically healthy marine ecosystems with sustainable ecosystem services. Improve communication, collaboration, engagement, and cooperative decision-making among all responsible governmental and tribal agencies and the public. Integrate, expand, validate, and update best available information, and identify missing information and uncertainties to support precautionary decision-making. Provide for adaptive mechanisms to keep management effective in the context of ever-changing social, environmental, biological, and technological conditions, and ever mindful of the rights of future generations to inherit healthy and productive ocean ecosystems.

This goal is key to making sure Ocean Planning is an evolving process that protects ocean ecosystems and their many services to the planet and people living on it now and in the future, and does *not* become a carving up of the ocean among its most powerful users.

POTENTIAL OUTCOMES [or DESIRED OUTCOMES]

Recommended new outcome: Precautionary and effective decision-making, made possible by better integration of all relevant sources of science-based information and traditional knowledge, and collaborative deliberation among informed parties.

Revision of #1: Improved decision-making time *and adaptive management* as a result of better coordination among agencies and increased availability and accuracy of information.

The wording of #3 makes the public ancillary to the role of decision-maker. In fact, the public, as owners of the commons should have a primary role in decision-making. While government agencies have responsibility to implement relevant laws, they are answerable to the public and should carry out public will in the context of those laws. We suggest the following modifications:

- Increased transparency and *improved public engagement with better understanding of decision-maker roles and responsibilities.*
 - *In order for transparency to improve, corporate privilege and confidential information are inappropriate for proposals to use public commons such as the ocean and its resources and for reporting to the public as a permitted use is underway.*

Similarly, we would suggest an addition to #4 as follows: Decisions made with full respect and accommodation for the customs and traditions of the indigenous peoples concerned, *and their participation in decision-making.*

#6 & 7 are extremely important as stated. To #7, we would add: over both short and long terms.

We suggest adding as a separate item that one of the outcomes would be well-designed monitoring programs to provide this information and enable adaptive decision-making.

POTENTIAL ACTIONS (or PROPOSED ACTIONS)

We suggest adding to #1 as follows: Incorporate regional data and maps into regulatory processes *and develop guidelines for ongoing incorporation of new information and adaptive mechanisms for responding to new information.*

Add to #2 as follows: Increase interagency coordination across management and regulatory programs *and identify conflicts and gaps that need to be corrected.*

Note that #3 is consistent with the need to bring the public into the entire process of decision-making.

#4 doesn't provide clear guidance. Perhaps it could be stated with more detail, such as: *With public participation, identify regional priorities for achieving "healthy ocean and coastal ecosystems" (first goal) and socio-economically vibrant communities* (or other wording coming from reworking the other goal, as suggested below). *Coordinate and leverage scientific information, traditional knowledge and programs for data development to address these priorities.*

The analysis of cumulative impacts prescribed in #5 is certainly essential for ocean planning (This action would also be useful for other purposes, such as various state and federal management of a variety of maritime activities and in revising federal laws.)

We would suggest adding some reference to implementing and adapting the framework developed under the other two goals (hopefully you mean it to be a single framework and not two separate frameworks).

Goal: Healthy Ocean and Coastal Ecosystems

"Develop a planning framework to protect, restore, and maintain healthy ocean and coastal ecosystems that provide social, cultural, spiritual, [*see below] and economic benefits. Account for changing environmental conditions and new information as it becomes available. Respect the intrinsic value of the ocean, [see below] and its biodiversity [;] and act as its steward/caretaker, recognizing humans as part of the ecosystems."**

Since developing a framework is the first step in achieving effective marine spatial planning and the goal for healthy ecosystems would drive management decisions, this goal should be listed first. It is critical to the sustainable use of the ocean and its living ecosystems over short and long terms. While fairly comprehensive as stated, the importance of these ecosystems to the human food system is neglected. This could be corrected by adding language where the asterisks are inserted in the statement of the goal above:

- * nutritional (or "sustenance" as referenced in outcomes and actions)
- ** its productivity

The goal could be further enhanced by adding to the end of the last sentence: "**...and the rights of future generations to a healthy, productive and bio-diverse ocean.**"

POTENTIAL OUTCOMES [or DESIRED OUTCOMES]

The outcomes of this goal should focus on the development and growth of the information base and, as prescribed by the goal, the development of a framework for protecting, restoring, managing, and maintaining healthy marine and coastal ecosystems. The framework is a key element of the goal and yet has not been mentioned in the draft outcomes and needs to be added.

Comments on list as drafted:

- Outcome #1 concerning areas of regional importance is unclear—what does “as appropriate” mean? How are the “areas of regional importance” mentioned in #1 different than those mentioned in #2? Shouldn’t all of those itemized characteristics and qualities be part of any maps and decision-making processes now and in the future as prescribed in #2? Shouldn’t areas of spiritual and cultural significance be included?
- The maps mentioned in outcome #2 need to first be developed, validated, and kept updated so they are available and suitable for being “incorporated into existing decision making processes”.
- Outcome #3 should be more concerned about developing (and continually updating) as complete as possible an understanding of changing environmental, biological, socio-economic, and technological conditions. Accounting for those in management is more appropriate under the next goal.
- Agree with Outcome #4 (priority listing of science and research needs and plan to address them). Suggestion: add “monitoring” to the needs.
- Agree with Outcome #5, and would add “drainage basin integrity” to riverine water quality, so that dams, irrigation withdrawals, and other water flow alterations are included.
- New outcome(s): A living framework that identifies areas, mechanisms, and decision trees for permitting (or denying) and locating various ocean uses; as well as guidance for the protection of sensitive areas, maintenance of healthy ecosystems, and restoration or regeneration of degraded areas.

POTENTIAL ACTIONS [or PROPOSED ACTIONS]

Generally, the action list is good. We suggest the following additions:

#1 should include a bit more: Map species, habitats, and areas of regional importance; and assess trends making sure to include the characteristics and parameters most critical to decision-making regarding potential uses. Incorporate all legitimate sources of such information. Provide for periodic review to make sure all the appropriate and best available information is being included in these maps.

To #3 (Identify geographic areas and species that are important for sustenance), We suggest adding the reason for doing this: ... in order to ensure their importance in the decision-making process about other potential uses.

In #4, it is important to add “regeneration” as evolving science is beginning to recognize that “restoration” to a former state is not always possible or desirable, as humans alter the environment and different species complexes may be better adapted to changed conditions. But healthy and diverse living ecosystems are the essential objective.

In #6, it will be necessary to first identify and prioritize uncertainties and gaps in knowledge and from that the research and monitoring priorities will emerge.

Uncertainties and gaps in knowledge will always exist, so it is critical to maintain that list as it changes and new information becomes available. The decision making process should always consider uncertainties and be precautionary in light of those.

Goal: Compatibility Among Past, Current and Future Ocean Uses.

We would not support a regional ocean plan that includes this goal as stated in the draft. It seems to be incompatible the other two goals. How can we possibly assume that all past, current and proposed future uses of the ocean are appropriate and compatible with a healthy planet? Our comments here apply only to the goal. Of course the Outcomes and Actions would have to be changed accordingly, so we have not commented on them.

If the general purpose of this goal is to address the needs of human communities depending on the ocean, then this does not do it. The goal statement for healthy ocean and coastal ecosystems actually covers that. But if more specifics are desirable, a second goal that is compatible with the first might be useful. But as it is stated, this goal seems to undermine the first goal by aiming to let everyone do everything they want to do in the ocean with the only constraint that they try to do it in a mutually compatible manner and with as little negative impact as possible. There is no recognition of people as part of the ecosystem and their role as such to be stewards/caretakers of marine ecosystems, as prescribed by the other goal.

Furthermore, this goal prescribes the development of a framework that appears to be different than the framework prescribed by the other goal. It should instead, prescribe building certain additional aspects into the framework already mentioned in the previous goal. If it does this appropriately it would add particular efforts to enhance and protect the social diversity and vibrancy and socio-economic stability of coastal communities dependent upon and integrated into ocean ecosystems. Concerns about shoreside infrastructure to support approved uses of the ocean should be couched in the context of a goal for healthy coastal communities.

This goal needs to be thoroughly overhauled. If this is where the public process has led, then it's difficult to imagine that Ocean Planning will truly support socially, economically and aesthetically vital coastal communities and robust and productive coastal ecosystems. It appears to be a compilation of everything that leads to controversy in coastal areas and simply says they must be made compatible. Instead, a serious assessment of the kinds of activities that are naturally compatible with healthy coastal and ocean ecosystems and also with sustainable coastal communities would identify appropriate directions for development of ocean activities and would also identify activities that have been proven or would like prove incompatible with a healthy ocean, planet, and human society. It might also identify activities that are essential but have the potential for negative impacts and provide guidelines for finding best alternatives to reduce or avoid those impacts.

This goal, with a focus on human endeavor, offers the chance for the Northeast Ocean Planning process to take a leading role in providing for ocean development that leaves us

with improved ocean ecosystems and abundant living marine resources for generations to come and with flourishing coastal communities. Instead, as stated, it is a goal that dismantles the Ocean Planning process and makes it just another way of grabbing resources.

Conclusion

The short message here is that the third goal and its supporting outcomes and actions need to be rewritten to be consistent with the framing principles and with the other goals. The other two goals are well framed; although we have suggested a few additions and modifications that we feel would improve the statements of these goals. We have also suggested additional outcomes and actions and additions to the wording of some others. For the first two goals, outcomes and actions that we have not mentioned, we generally support.

Although the goals are not numbered and do not seem to be prioritized, it might make more sense to list them in a logically progressive order that begins with the overarching outcomes and ends with the general mechanisms of getting to those outcomes.

Accordingly, the goals, once revised, could be reordered follows:

Goal 1: Healthy Ocean and Coastal Ecosystems

Goal 2: Compatibility with Healthy Coastal Communities and Ecosystems. (instead of draft goal emphasizing compatibility of all possible uses)

Goal 3: Effective Decision Making

Yours truly,

Niaz Dorry, Coordinating Director

Boyce Thorne Miller, Science Advisor

Shannon Eldredge, President Board of Directors

From: Ann Pembroke [mailto:apembroke@normandeau.com]
Sent: Wednesday, July 03, 2013 2:30 PM
To: John Weber
Subject: RE: Announcement: Public Comment Period Extended

John:

As I am not really sure where my comments would fit into NROC's stated goals, I decided simply to email you.

- As I stated at the meeting, I think it is important that NROC reach out to the various state agencies that have been involved in reviewing and permitting offshore projects to learn about their processes. For example, in Massachusetts (the state I have the most experience in), the Corps hosts monthly meetings among the regulators to discuss projects and larger issues. Developers can request an appointment to present and discuss specific project issues.
- BOEM has certainly convened regulatory and resource agencies to assist in identifying what areas are suitable (or not suitable) for offshore wind development. I'm sure BOEM staff can provide you with insight as to their experiences with that process.
- I suggest being very careful in how any type of "zoning" or exclusive/inclusive areas are defined. As I'm sure you're aware, Massachusetts defined virtually all of the coastal waters within state jurisdiction as ocean sanctuaries and specifically prohibited activities related to energy development from occurring within those areas. It seems that what they had in mind was to avoid any attempts to extract oil or gas, but definitions in the Ocean Sanctuaries Act were unclear. It became an issue when the HubLine natural gas pipeline was proposed. Ultimately the project was permitted and installed, but not without extended discussions as to what the law intended. I guess my point is that it is difficult to imagine what future needs and types of projects might be. It may be best to focus on defining what types of alterations to the environment might be considered (or prohibited) rather than what types of activities/projects would be allowed.
- Recognize that economic drivers and environmental issues will continue to change.
- I left some comments on some of the maps. One further thought - while it is very impressive to show all the data for a particular use on a single map, I think it is also important to see the perspective of a per day or per season use.

What you are attempting to do is, of course, not easy but is certainly admirable. And, of course, it will be impossible to please everyone! I wish you the best of luck!

Enjoy Independence Day knowing that we're lucky enough to have the freedom to help guide the federal process!

Ann

ANN E. PEMBROKE, Vice President
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July 24, 2012

Betsy Nicholson
Federal Co-lead for Northeast Regional Ocean Planning
NOAA Ocean Service
Northeast Regional Office
55 Great Republic Drive
Gloucester, MA 01930-2276

Dear Ms Nicholson and team,

After having attended the public meeting in Gloucester in May 2013, I now write to share my comments in relation to the draft regional ocean panning goals. Let me start by expressing my appreciation for the extension of the deadline for comments. This was extremely helpful to me and is most appreciated.

Before turning to the goals per se, let me say I remain critical and skeptical of the entire concept of ocean spatial planning. I well understand that the expressed intent to protect the ocean from undue and ill thought-out uses. I, however, remain very concerned that in the zealousness of attempting to create policy that *protects* the oceans, we are at risk of creating policy that will end up designating this area of the ocean, for this and that area, for that; and in doing so we will have ended access to the oceans as one of the world's most important *commons*, instead declaring different areas of the ocean for this and that corporate exploitation.

In creating a policy for ocean management we need to assure that this is not so and that access to the resources of the ocean remain open to all citizens who choose to partake of them in a responsible way and do not become the locked-in purview solely pro-profit corporations. We also need to assure a process that remains open to the understanding that, in 2013 we do not fully understand how the ocean and its products might be valuable to humankind in the future. Additionally we need to create a policy that expresses the clear understanding that the ocean is the major balancing factor in our planet's ecosystem and not just a collection of resources available for extraction.

While surely I have not read every document available in this process, I remain concerned that I do not see these philosophical underpinnings clearly delineated in what I have read or heard at meetings and this needs to be more clearly spelled out.

An example in an ocean area near Gloucester can clearly illustrate this concern. We have two LNG terminals, corporate endeavors, near Gloucester which were installed despite more than 500 pages of documentation and objection being filed. The areas around those terminals remain greatly restricted to commercial and pleasure boat traffic as well as to potential fishing, despite the fact that these terminals are at present little used because the gas industry has, for the present, found a more lucrative, and more destructive, I might add, source of gas availability in fracking. Yet the restrictions remain. Only long term corporate interests are served and not those of the larger population. This is an excellent example of ocean planning gone awry

Turning to the goals as currently stated, and as I noted at the Gloucester forum: The 1st goal ought to be that of "Healthy Ocean and Coastal Ecosystems." And this process ought to be assisted by

having clear criteria stated that will be the basis of this - the sustaining of a healthy ocean and coastal ecosystem. We all need to see and hear how you will determine what is healthy. What are those standards now in 2013? How can they be enhanced as we go forward into the future? Again the absence of a framework against which you or anyone will measure is sorely lacking in the current stated goals. This is a huge short-coming to my mind.

Yes, some of the stated potential outcomes hint at what some of these criteria could be. But they need to be stated. And they need to be less ambiguous. For example, potential outcome #3 in this section says “current understanding of changing conditions is accounted for in management responses.” What does that mean? Accounted for in what direction for the changing conditions? Against what criteria?

Current goal #3 addressing “Compatibility among Past, Current, and Future Ocean” uses again lacks any means of assessing the healthiness of those uses and the impact on uses of this most important commons – the ocean. Again the goal recommends “recognizing local priorities and the connection of ocean uses and the ecosystem to shoreside infrastructure” which is surely a valuable goal. But when there are conflicts in those local priorities what are the criteria against which decisions will be made as to what goes forward?

Without clear criteria of the benchmarks that constitute healthy uses of the ocean, how will these inevitable conflicts get resolved? At present they mostly get resolved in favor of the most powerful and the wealthiest and mostly in favor of large corporations rather than the groups of ordinary people collectively trying to access the commons. The ocean should only be seen as of economic value when we –collectively – can demonstrate that the economic benefit leaves the resource sustainable, the commons intact, and the ecosystem unharmed.

Also within goal three, item 3.b. of potential actions suggests we “assess current and foreseeable trends in commercial fishing in New England, relying on information available through fisheries management efforts.” This absolutely should not be the sole source of data used to establish fish/catch management as the current and enormous controversy surrounding stock assessments and catch limits in New England illustrates. The entire U.S. needs up-to-date and reliable, multi-faceted sources of data, which we do not currently have, making this statement more than a little ludicrous.

The first stated goal, in the current draft, is “effective decision making.” While this is an admirable goal it is a process goal that ought to facilitate the real first goal of a healthy ocean and coastal ecosystem. Form should follow function, not lead function. You can only have effective decision making if you know what the criteria are around which you are trying to make decisions. Working to “reflect ever changing social, environmental, and technological conditions” again only has meaning if the criteria are clear. For example, among current changing social conditions are those that say the goal is to extract everything we can from the land and the oceans. Clearly this is not a protective assumption. These general, open ended policy statements need to have some grounding in the realities of science and preservation of a healthy ecosystem.

I would suggest this section ought to also have a seventh potential outcome which ought to be listed as #1 – that being “act to assure that control of ocean resources is not in the hands of the few but remains truly available to the larger society.” This also necessitates the dropping of #2 “ reduce appeals and conflicts during permitting.” While appeals and conflicts can indeed slow valuable processes, appeals and conflicts that get resolved have to remain part of the process to assure wide participation in the process.

In conclusion, let me state my appreciation of being able to participate in this process and I trust my remarks will be taken into consideration. Please assure that there is an on-going notification system established for up-coming and future meetings and sharing of information and enter me into that notification system. To that end, my email address is provided above.

Sincerely,
M. Sunny Robinson

We need to move towards much more thoroughly regulated and ecosystem-oriented and research-based management of marine resources to replace current destructive practices driven by politics, vested short-term interests, and economic desperation. On the Maine coast, these practices include over-fishing, bottom dragging, and removal of key species, such as rockweed (*Ascophyllum nodosum*) without scientific justification. A viable management approach would need to greatly increase emphasis on research and public education.

To: Betsy Nicholson (NOAA & Federal RPB Co-Lead); Grover Fugate (RI Coastal Resources Management Council & State RPB Lead); and Chief Richard Getchell (Aroostook Band of Micmac Indians and RPB Tribal Co-lead)

From: Rev. Robert F. Murphy, Chair- Cape Cod & the Islands Group- Sierra Club

Subject: Written Comments for the June 19 NOP RPB Meeting in Barnstable Village, Ma.

The following comments are submitted on behalf of the 1100 members of the Cape Cod & the Islands Group- Sierra Club in regards to the New England National Ocean Policy Regional Planning Board Strategic Action Plan (NOP RPB SAP) which is to be developed by 2015. As a grassroots Sierra Club entity we will focus on local concerns and leave it up to the New England Chapters and Marine Action Team (MAT) to address wider concerns in state (0-3 miles off of the coast) and federal jurisdictional (3-200 miles) water. Our concerns reflect the link between watersheds on Cape Cod and the ocean waters off of our coast which have been impacted by decisions by state/federal agencies to protect wild places, wild things and decisions to permit or manage various human uses of the ocean (fisheries managed by state and federal governmental agencies; large scale wind farms proposed by the Bureau of Ocean Energy Management (BOEM); transportation corridors into the port of Boston and ferries to Marthas Vineyard/Nantucket; Cape Cod Commission section 208 watershed-based water quality plan that links human activities on land to impaired coastal embayments; critical habitats for North Atlantic right whales and potential Habitat Areas of Particular Concern (HAPC) for fish managed by the New England Fishery Management Council (NEFMC); and management of seabirds and migratory bird populations by the US Fish & Wildlife Services and key species protections/ocean use zones provided under the Massachusetts Ocean Management Plan (MOMP).

Since Cape Cod and the Islands have an economy based upon tourism; retirees and real estate and various scientific institutions in Woods Hole, Ma., our socioeconomic system and associated natural capital/ecosystem services are linked to the surrounding ocean and human activities in coastal watersheds. The perceived effects of ocean climate change has resulted in 40% of our homeowners not being able to purchase homeowners insurance in the private market and being forced into the state FAIR system (with most private and public policies having 5-10% wind deductible riders). Hurricane Bob (1992) and Blizzard Nemo (2013) have shown that Cape Cod is susceptible to extreme weather events which have lead to power losses and stretched our emergency services network which is a major concern as we enter hurricane season along the Atlantic seaboard. Pollution (nutrients and contaminants of emerging concerns or cecs) from septic systems have contaminated our drinking water with cecs and diminished water quality/lead to habitat losses (wetlands and eelgrass beds) in some of the 56 coastal embayments on Cape Cod (based on the Massachusetts Estuaries Project models/reports and Ma. DEP TMDLs for nutrients). These wastewater challenges will cost billions of dollars to resolve over the next 20-30 years which poses environmental justice (EJ) concerns for our residents with limited incomes (< \$30 K per year). We also face municipal solid waste challenges and transitioning to zero waste approaches over time (source reduction; reuse, recycling; Extended Producer Responsibility for ewaste; composting or anaerobic digestion to reduce the volume of organics in our waste stream; dealing with excess sludge from our new or expanded centralized Wastewater Treatment Plants (WWPPs); etc.).

Our chair, Rev. Robert F. Murphy, has developed a webinar on local responses to extreme weather events and the associated emergency services. He has received a national Sierra Club Special Services award for his grassroots EJ work. Deceased Sierra Club activist, Barbara Fegan, was recognized as an "environmental hero" for her work in helping establish the Stellwagen Bank National Marine Sanctuary in Massachusetts Bay (north of Cape Cod). Dr. David Dow has received Sierra Club recognition for his work on the Superfund/Safe Drinking Water Act cleanup at the Massachusetts Military Reservation (MMR)(environmental hero) and service on the Sierra Club's Ocean Renewable Energy Task Force (Special Service Award). The

Cape Cod Group Excom (executive committee) developed the Massachusetts Chapter's Sustainable Fisheries Policy in the mid-1990s which provided the basis for the national policy approved by the Club's Board of Directors in 2002. Our Group also helped draft the Sierra Club comments for the Massachusetts Ocean Management Plan (MOMP) which is one of the models for the NOP RPB process in New England. We will be involved in the outreach for the Sierra Club's fact sheet on cecs which will be released soon. Our activists support various national Sierra Club Activist Teams (EJ; Toxics, Marine Action Team; etc.) and campaigns (Ocean Wind Energy) and support some of the Massachusetts Chapter's Committees (Zero Waste; Energy; Marine & Coastal; etc.).

Thus we have a record of involvement at both the grassroots (Groups and Chapters) and national level within the Sierra Club. Our Group was only formed in 1990, so that these accomplishments reflect the dedication of a small group of activists over a relatively short time span. Many of our members volunteer with other ENGOs in our towns or County and support community of faith EJ endeavors. We helped organize the EJ conference in Falmouth in April 2012 and two water justice conferences in 2011. We co-sponsored a workshop on: "Beyond Cape Wind: Community Benefits" in Woods Hole, Ma. that involved ENGOs and federally recognized tribes. We feel that educational outreach is an important component of our environmental mission and are willing to support the NOP RPB outreach process at the grassroots level. The Sierra Club's Marine Action Team received an activist team grant to support the NOP process. MAT has submitted comments on the national NOP SAP and held training workshops regionally on the NOP RPB process (one was held in January 2013 at the Massa. Chapter Office in Boston). A number of New England Chapters (Connecticut, Maine, Massachusetts, and Rhode Island) have supported letters from NEOAN (New England Ocean Action Network) which supports the NOP RPB process in our region. The CC&I Group will let these entities that are higher in the Sierra Club volunteer leadership hierarchy speak for themselves on the New England Strategic Action Plan, but all of these comments have to be consistent with the MAT NOP SAP comments (Sierra Club policy of speaking with one voice).

Our specific comments will be listed by the national NOP SAP goals (MAT addressed all nine of these goals, but the CC&I Group will focus on five that reflect our grassroots concerns and local campaigns on which we work):

*** SAP #1: Ecosystems-based Management (EbM)**

The CC&I Group worked with Dave Raney (former head of MAT) to develop the following graphic on adaptive, ecosystem based management (AEbM) for the Massachusetts MOMP comments (which can be found on the Chapter website under the Marine & Coastal Committee). This graphic reflects concerns about climate change which is the Sierra Club's top national conservation endeavor. Many local/state/federal planning projects mention EbM as being part of this cooperative learning and management process, but don't describe this in an operational manner. This the Sierra Club version that combines science with management components that are interlinked via Advisory Committees and the public outreach processes to revise plans based on monitoring program findings in the impaired Ocean Act jurisdictional water (0.3 to 3 miles off of the coast). The NOP RPB needs to expand the proactive engagement with the public (including community of faith groups engaged in EJ issues) and other users in the NOP RPB SAP dialog (which has tended to be dominated by policy wonks; ENGOs; fishermen/women; renewable energy interests; etc.). The Public meetings are one way to do this, but they appear to have had limited media coverage which has reduced the number and diversity of participants in the SAP dialog at these public meetings.

We are sure that NROC (New England Regional Ocean Council) staff have reached out to the constituents with whom they traditionally work, but the NOP RPB process needs to move beyond the "usual suspects". We face a similar challenge here on Cape Cod in the numerous workshops and outreach programs that we have on our wastewater challenges which have meetings during the day in various centralized locales. One has to engage the public in meetings where folks live

(MOMP staff met fishermen/women in their home ports) or piggy back with existing outreach/adult education endeavors (the CC&I group has done joint programs with community of faith groups- especially the Unitarian Universalist Fellowship of Falmouth). Many of the venues where the NOP RPB meetings have been held are too expensive to stay at overnight and the public has to provide their own food (unlike many of the wastewater conferences on Cape Cod or the recent Cape Coastal Conference which focused on wastewater and climate change challenges that we face). David Dow had to drive over and back to the April 2013 NOP RRPB meeting in Narragansett, RI in order to represent the Sierra Club, since the CC&I Group can't finance over night accommodations at an expensive hotel complex. He utilized a brown bag lunch.

There needs to be some type of science translation process that relates the SAP goals (like EbM; CSMP; etc.) to something with which the public can relate. Here on Cape Cod such services are provided by the Consensus Building Institute (CBI); Cape Cod Commission (CCC) and Waquoit Bay National Estuarine Research Reserve (WBNERR) staff and workshops organized by the Water Alliance and its local supporters who favor decentralized wastewater solutions, plus summits developed by the Association to Preserve Cape Cod (APCC). The communities of faith were involved in organizing one of the 2011 Water justice conferences at the Barnstable Unitarian Universalist Church and the April 2012 EJ conference at the Falmouth Public Library (both events drew good crowds for Saturday events during the day). WBNERR organized a Cape Cod Coastal Conference for June 13-14 in Hyannis, Ma. which was well attended. Thus there are numerous events on Cape Cod that address our wastewater challenges/potential solutions and address EJ/water justice concerns that are overlooked in traditional forums on environmental issues. The NOP RPB and NROC should take advantage of some of these events to spread the word on the NOP RPB SAP and obtain proactive input from the public; small environmental entities that are volunteer based (like the CC&I Group) and various user groups that lack paid staff (fishermen/women). There is a need to achieve broader public support for this endeavor in order to provide more resources (people and \$) for public outreach and support of proactive advisory committees.

*** SAP # 2 Coastal and Marine Spatial Planning (CSMP)**

Even though the NOP RPB mandate is to integrate ocean planning from various state/federal agencies that engage in management and permitting endeavors, we have a very chaotic scheme in the ocean adjacent to Cape Cod for fisheries management (Closed Areas for mobile fishing gears and Potential HAPCs for Essential Fish Habitat); BOEM large scale wind farm development zones; SBNMS efforts to protect ocean biodiversity while allowing compatible human uses; NARW critical habitats under the Endangered Species Act; MOMP zones for development of community wind turbines in state ocean act jurisdictional waters and protection of species at risk habitats); anadromous fish breeding habitat protection in coastal rivers and ponds; etc. Many of these endeavors follow the BOEM large scale wind farm zone experience of an official announcement of the project's development with limited proactive, public engagement in the ocean planning process (which occurs in the state task force meetings which are not open to the media or public). It is unfortunate that BOEM appears to have learned nothing from the "Cape Wind" planning process which engendered opposition to ocean wind development on Cape Cod from some ENGOs and commercial fishing interests. BOEM has Advisory Committees on Fisheries and Habitat, but it is not possible to find out who the membership is and approach them about concerns from grassroots entities like the CC&I Group.

NROC conducts many constituent meetings that are by invitation only which have the appearance of decisions being made by the "usual suspects". Hopefully the NOP RPB process will learn from these past mistakes and develop a more proactive Advisory Committee and public engagement processes (webinars and social media offer a number of cost effective techniques to augment the traditional reliance on workshops/listserves). Many younger people rely entirely on social media to communicate with one another and often dominate at the New England EJ Forum meetings in Worcester, Ma. Cape Cod faces serious demographic challenges as our mean

population age increases, since young families find it hard to live here and bring in enough income to finance a mortgage to buy a home. EPA Region 1 supports the New England EJ conference and other federal/state agencies should have outreach programs for non-traditional constituents. Having public meetings where these non-traditional constituents have 3 minutes to express their concerns is not an effective outreach tool. The visit by the UN Independent expert on Water justice, Dr.Catarina du Albuquerque, offers one alternative where she held a round table dialog with less affluent residents that was separate from the formal public session dominated by comments from ENGOs and user groups. The April 2012 EJ meeting followed a more informal format where folks could share their experiences and its relevance to the topics under consideration.

CSMP needs to be related to the public's concerns about having waters that permit fishing; recreation and leisure activities; provide seafood that is safe to eat; etc. A good case study to follow is the Massachusetts Water Resources Authority's contingency plan for the ocean outfall in Massachusetts Bay which related the scientific warning and caution monitoring program targets to areas of public concern. The Canadian Department of Fisheries & Ocean's Eastern Scotian Shelf Integrated Management (ESSIM) Plan cooperative learning development model provides another relevant case study for ocean planning engagement with the public. Some of the wastewater workshops on Cape Cod have focused on community resilience;adaptation and ecosystems-based management which are all relevant to the ocean planning dialog if they engage the public in an accessible fashion. We have already mentioned that the BOEM and MOMP outreach processes offer some negative case studies of effective public engagement and outreach, since they limit proactive input in the planning processs and use terminology to which many people can't relate. The CCC section 208 watershed planning process has brought contractors onboard to help develop more effective outreach models, while WBNERR conducts effective public education workshops for policy makers and the general public that utilize staff science translation expertise. CBI has a pilot test site for cooperative action on climate change in Barnstable, Ma. (part of a collaboration with NEERS that includes Wells, Me; Cranston, RI and Dover, NH).

The NOP RPB needs to develop an ocean planning program that integrates existing state/federal agency zoning endeavors and makes this information available to the public in an accessible format that allows the wider public to engage in this dialog. Currently we appear to be data rich, but information poor, so that the NOP RPB SAP dialog has been dominated by ENGOs and well organized user groups. The NOP RPB should use the lessons learned from other ocean planning endeavors (both positive and negative) to organize an effective Public Advisory Committee and public engagement process in developing the New England SAP. Grassroots entities are overwhelmed by the multitude of separate local/state/federal ocean planing endeavors which are chaotic and too complex for meaningful engagement by the public which will be impacted in both socioeconomic terms and environmentally for the life style that attracts people to Cape Cod as a place to live and visit as tourists. We face threats from numerous human-based stressors in our coastal watersheds that have impacted the adjacent ocean that supports our life style in this special place.

*** SAP # 5 Resiliency and Adaptation to Climate Change and Ocean Acidification**

Cape Cod has faced a loss of critical groundfish stocks (cod, halibut, yellowtail flounder; etc.) and increases in some groundfish species (haddock; white hake; some skate species; etc.), whose catches are constrained by bycatch constraints in the sector management approach for groundfish that has been implemented by the New England Fishery Management Council (NEFMC). The Sierra Club's Sustainable Fisheries Policy doesn't address "catch share" management approaches, so that our focus will be on the bottom up and top down factors that control "natural mortality" (leaving it up to the Marine Action Team to comment on "fishing mortality"). It has become apparent that ocean climate change has altered the distribution/abundance of mobile marine species, while increased acidification is negatively impacting shell fish and plankton that have calcareous shells. In the water south of Cape Cod,

lobsters have moved into deeper water in the Summer as coastal waters increase in average temperature, while many forage fish like Atlantic herring move into the Gulf of Maine to the north of Cape Cod (being replaced by menhaden and butterfish from the Mid-Atlantic region). We face diminished populations of river herring returning to their coastal watershed breeding habitats from multiple stressors during the marine portion of their life cycle and land use changes in coastal watersheds.

Warmer Winters have changed the size distribution and abundance of phytoplankton and zooplankton which has caused shifts in the grazing food chain (Spring diatom bloom ----> forage fish & filter feeding benthic invertebrates ----> groundfish and pelagic fish species; whales and seabirds -----> Apex predators (coastal and pelagic shark species; seals; etc.) and increased the importance of the microbial food web (dissolved organic carbon and dead particulate organic carbon ----> bacteria ----> microzooplankton (consumed by small particle filter feeders like jellyfish) ----> forage fish and invertebrate predators (like squid and lobsters) which have increased ---->etc.) which dominates during the Summer. Increased abundance of Apex predators has increased predation on groundfish and pelagic forage fish which is a top down impact on the grazing food chain. Thus even though the total biomass of fish has remained fairly constant, the distribution and abundance has changed over time due to selective fisheries harvesting and changes in "natural mortality" driven by environmental factors (climate change and eutrophication). State and federal fishery management plans have to revise their "natural mortality estimates: and identify new targets for depleted fish stock rebuilding plans. MAT has had some electronic exchanges on this topic and can provide the Sierra Club thinking on this challenge from a coast-wide perspective.

In addition, the climatic shifts in distribution/abundance of benthic invertebrate prey and their groundfish predators has altered food chain relationships. Ocean acidification, nutrient (Nitrogen and Phosphorus) enrichment from coastal watershed land use activities (more people and greater development) and invasive species have complicated this situation. Thus there is an ongoing regime shift in the ocean food chain that support wild species and their habitats. The NEFMC has asked the Ecosystem Status Group at the Northeast Fisheries Science Center to develop an ecosystem framework for fisheries management that reflects these changes in "natural mortality" (both bottom up and top down forcing factors). The CC&I Group supports this endeavor and hopes that it leads to more effective management of living marine; protected and natural trust resources by state and governmental agencies. The ecosystems approach to fisheries management allows LMRs to be managed in a more holistic context, while protecting PRs and NTRs.

One Sierra Club mandate is to protect wild things and wild places in the ocean and promote biodiversity/enhance natural capital & ecosystem services in the marine environment. Thus our priorities differ from those of state/federal fisheries managers, who's primary clients are saltwater anglers and commercial fishermen/women.. MOMP excluded fishing from its ocean planning regime, but identified fishing as a preferred activity in the multiple use areas. The NOP RPB SAP has decided to include fishing as part of its ocean planning process and wants to develop compatible uses in the same ocean bottom lands and overlying water column. Ensuring compatible uses while promoting environmental conservation/preservation is a challenging mandate for the NOP RPB. This involves interactions between land use activities in coastal watersheds and water quality/EFH productive Capacity in coastal ocean waters.

These efforts to protect wild places, wild things are lead by MAT and the state Chapters in New England, so that the CC&I Group tries to support these efforts at the higher levels in the Sierra Club's volunteer leadership hierarchy. Many of the Sierra Club environmental campaigns are lead by volunteers which are supported by paid staff, so that NOP RPB SAP interactions will occur at the grassroots (Group and Chapters) and national level (Activist teams and Climate Change Partnership Campaign). Thus our Group will leave it up to these other entities to describe their concerns and associated recommendations for the 9 SAP goals (including #5). The major CC&I Group concern is that we are viewed as Cape No Cod and that ocean climate change has altered the marine ecosystem in the adjacent ocean which is undergoing regime shifts. These regime shifts support a need for AEbM and CSMP which we discussed previously. Thus the past may not be a good predictor of the future in regards to recovery pathways and new recovery states in an altered marine environment effected by climate change and ocean acidification. This requires dynamic rather than steady state modeling, monitoring and science approaches for both AEbM and CSMP. A similar argument can be made for storm surge modeling of coastal flooding associated with extreme weather events and the development of climate adaptation plans on Cape Cod (topic discussed at the recent Cape Coastal Conference). Hopefully the NOP RPB SAP will recognize these challenges and develop appropriate tools to deal with this situation.

* SAP # 6 Regional Ecosystem Protection and Restoration

Our major recommendation is that the Waquoit Bay watershed be designated a regional pilot test site for EbM. This would take advantage of the EPA lead Waquoit Bay Watershed Ecological Risk Assessment project (ERA) which identified nutrient loading (nitrogen in the marine portion and phosphorus in the freshwater kettle hole ponds) as the major human stressor in this Cape Cod Watershed (see attached poster). The towns of Falmouth, Mashpee and Sandwich have developed Comprehensive Wastewater Management Plans (CWMP) to address nitrogen loading in Waquoit Bay and its sub-estuaries. Since all three of the town CWMPs use different approaches to reduce nitrogen loading, this watershed is a good pilot test site for the Cape Cod Commission's section 208 watershed planning report and associated pilot tests. Mashpee is conducting an oyster aquaculture pilot test in Waquoit Bay, while the Falmouth Water Quality Management Committee is conducting pilot tests that range from Ecotoilets in homes to inlet widening modeling. WBNERR is the site of numerous scientific studies (including saltmarsh studies to reduce erosion that is likely to accompany sea level rise) that are converted into information useful to policy makers and for public outreach events/workshops. This science translation and educational outreach are keys to solving the challenge of being data rich, but information poor that constrains many state/federal/tribal planning and management endeavors.

One of the prime CC&I Group outreach endeavors is the WBNERR Watershed Block Party. This year we plan to focus on extreme weather events and emergency service challenges and the soon to be released Sierra Club cec fact sheet which David Dow helped develop. The CC&I Group is part of the Activist Team Grant for outreach on the cec fact sheet. We work with community of faith and EJ groups on dealing with some of the practical consequences of climate change on ordinary citizens. Rev. Robert Murphy and Odin Tidemand worked with the Falmouth Clergy Association to develop a webinar on extreme weather events and emergency responses (that was partly funded with EPA). Sierra Club policy prohibits the acceptance of state/federal government grants to support our conservation campaigns/environmental outreach endeavors. We previously mentioned some of our EJ and water justice outreach projects. WBNERR has a Friends Group that supports fund raising projects and provides volunteers to support the activities of their paid staff. WBNERR is state/federal partnership which is supported by various volunteers.

Thus WBNERR provides resources that could help support the Waquoit Bay watershed as a pilot test of various wastewater management technologies and the associated regional ecosystem protection and restoration goal of the NOP RPB SAP. Recovery of the eelgrass beds

in Waquoit Bay and its sub-estuaries would provide essential fish habitat for living marine resources (LMRs) like bay scallops, in addition to currently harvested soft and hard shell clams and oysters produced from aquaculture operations. Dr. Linda Deegan (Marine Biological Laboratory- Ecosystems Center) has done extensive studies on the fish/habitat relationships in Waquoit Bay, while Dr. Ivan Valiela's (MBL- EC) LTER (Long Term Ecological Research) team has studied nutrient loading (N and P) from human activities in the watershed and its effects on water quality/habitat loss. Researchers from the Woods Hole Oceanographic Institution have studied ocean acidification effects on shellfish larvae/spat and the underground estuary that links groundwater to the freshwater input into the bay. Boston University scientists have been exploring the nitrous oxide cycle in Waquoit Bay and its relationship to the sedimentary environment. The Woods Hole Research Center has mapped land use changes on Cape Cod as our population has grown and more development has ensued. Some of the federal marine laboratories in Woods Hole also conduct studies in Waquoit Bay and its watershed. The abundance of existing scientific information was one reason that EPA conducted the ERA in Waquoit Bay. The EPA Ecological Risk Assessment process has many analogies to the NOP RPB SAP EbM goal. WBNERR offers scientific research updates at various times between the Fall and Spring. WBNERR also conducts its own research projects with the Saltwater Observatory and Saltmarsh marketing of nitrogen and carbon ecosystem services project being good examples.

*** SAP # 7 Water Quality and Sustainable Practices on Land**

Our impaired coastal embayments have resulted from nitrogen loading from septic systems; lawn fertilizer application and regional airshed combustion sources, but the Ma. DEP Total Maximum Daily Loads (TMDLs) focus is on reducing nitrogen loading from local nonpoint sources (septic systems). The section 208 watershed planning project will expand the scope of water quality challenges that we face here on Cape. This reflects a trend that nonpoint sources now account for much of our nutrient loading (N and P) challenges nationwide and that toxic pollutants (cecs) also come from nonpoint sources. For the freshwater end of the Waquoit Bay watershed, septic systems and the former MMR sewage treatment plant are responsible for much of the excess phosphorus loading to Ashumet Pond. The Air Force Center for Energy and Environment (AFCEE) has conducted alum treatments to trap "P" in the bottom sediments and installed a permeable reactive barrier (PRB) along the shoreline to intercept some the Ashumet Valley Plume "P" source. Ed Eichner (UMass- Dartmouth- SMAST) discussed the freshwater "P" problem at the recent Cape Coastal Conference.

Dr. Ken Foreman (MBL- EC) has done experiments in Waquoit Bay with PRBs to intercept the "N" enriched groundwater, while the Falmouth WQMC has a PRB pilot project in Green Pond. The CCC section 208 watershed planning report will also include pilot tests of various wastewater technologies to reduce nutrient loading (N and P) on Upper Cape Cod. Cape Cod will spend billions of dollars over the next 20-30 years to mitigate our coastal embayment impaired water quality and lost habitats (eelgrass beds and saltmarshes) from excess nutrient loading from septic systems and fertilizers used on lawns/agricultural operations. Developing solutions for our wastewater mitigation challenges has involved the towns (CWMPs); Cape Cod Commission (RWMP and section 208 plan), state (Ma. DEP and EOEEA) and EPA Region 1 and interactions with residents who will have to fund these expensive infrastructure development projects (sewers and centralized WWTPs are key components of the proposed solutions). Even though Cape Cod has expensive real estate values, many residents have limited incomes which creates EJ concerns on how to allocate the costs in an equitable fashion and whether cheaper, more sustainable decentralized alternatives (pilot projects) should be part of the solution.

Part of the solution is to adopt more "sustainable land use practices" and develop organic waste reduction approaches (composting and/or anaerobic digestion) for the excess sludge generated

from new or upgraded WWTPs. Another part of the solution is to use the Ecotoilets and associated composters to reduce sludge production and the high costs associated with sewerage in more rural parts of Cape Cod. Fertilizer bylaws have been proposed to reduce this source of nutrient enrichment. Silent Spring Institute (SSI) studies have shown that septic systems are the major sources of cecs in our drinking water (and are likely to be adsorbed to our excess sludge/dissolved and be found in our treated sewage effluent which poses disposal challenges for discharges into ground or surface waters). Excess sludge disposal with adsorbed cecs provides opportunities for Zero Waste Approaches for municipal solid waste (Sierra Club's preferred option). The cec fact sheet will provide links to material that will help the public reduce exposure to cecs in their homes and drinking water/food, since these chemicals aren't regulated on Cape Cod by the state or federal governments .

Cape Cod has good wind energy resources which can support large scale wind farm zones in federal jurisdictional waters and community wind turbines on land/in the coastal ocean. Thus we could become carbon neutral in the future by utilizing abundant wind energy and pursuing ZW approaches for MSW. We also have solar panels on the roofs of various public and private buildings that can provide "green electricity". Thus we have the tools for becoming carbon neutral and reducing our ecological footprints if the right incentives are provided at the town, county and state level. Massachusetts has state climate adaptation and mitigation plans which need to be implemented at the grassroots towns and county) level on Cape Cod. Much of the recent focus has been on recovering from the 2008 economic meltdown and decreased home values on Cape Cod (and rising costs to homeowners on fixed incomes to be able to continue living here).

Our populations has grown older as young people move away and we gain more retirees. These demographic challenges constrain plans to transition to more sustainable life styles and help preserve wild places, wild things on land and in the adjacent ocean. The slowing of population growth and development pressure as we approach buildout provides us with a window to make the transition to sustainability and reduce our ecological footprints. Many coastal communities in New England face similar challenges to Cape Cod, so that we would like to see the NOP RPB SAP address these potential challenges and explore various scenarios to help transition to more sustainable life styles, while providing economic and social opportunities for young families. We appreciate it that the NOP RPB and NROC made it possible to share our concerns and suggest potential solutions by holding a meeting here on Cape Cod. Most of the time we have to travel to New Bedford or Boston to participate in public outreach meetings. These urban areas face different problems and potential solutions than Cape Cod which has more in common with coastal Maine and regions along Narragansett Bay in Rhode Island. This was readily apparent to the Ma. EOEEA (Executive Office of Energy and Environmental Affairs) when they attended the April 2012 EJ meeting at the Falmouth Public library.

Thanks for this opportunity to share our comments on the NOP RPB SAP. Hopefully this public dialog will support the development of a meaningful Strategic Action Plan by 2015. The NOP RPB mandate for developing compatible ocean uses while protecting ocean wildlife and their habitats/enhancing marine biodiversity is very challenging. I am sure that the Sierra Club will continue to support this endeavor at the national and grassroots level. Let the CC&I Group know where we can help out at the grassroots level.

Attachments:

* MOMP Plan Comments from Massa, Chapter- Adaptive Management Graphic:

Definitions and Flow-Chart Description - Marine Spatial Planning Process
Ecosystem Status Report: describes existing state of marine biota (distribution and abundance in time)

and space) and their associated habitats, plus the key environmental processes that support these components

Human Usage Report: describes the spatial distribution and socioeconomic outcomes associated with fishing, sediment dredging, aquaculture, proposed renewable energy projects, marine transportation lanes, recreational activities, etc.

Conceptual Model (options): risk analysis; vulnerability analysis; scenario techniques; complex adaptive approaches.

Modeling/Marine Spatial Databases: NEFSC Bottom Trawl and Food Habits ; Nature Conservancy
Marine Ecoregional Assessments (MERA); U.S. Geological Survey Seabed Sediment mapping;
Massachusetts. Ocean Management Plan human uses (fishing, recreation, marine transportation, beach renourishment), SSUs habitats/marine life (special, sensitive and unique) and EVI (Ecological Valuation Index); potential wind energy maps; etc.

Monitoring Program: Site specific (project proponent) and regional context (MMS; Massa.state agencies) for physical, chemical, geological and biological components specified in permits or government work plan.

Siting Criteria/Performance Measures/Indicators: changes in distribution/abundance of key fish, marine mammal, seabird/shorebird species; biomass spectra of marine food chain; benthic/epibenthic indicator species; sustainability indicators; socioeconomic direct/indirect/induced benefits (multiplier ratio); changes in human usage patterns; etc.

Science Advisory Committee: MOMP Ocean Science Advisory Committee Management Options:

- **Mitigation - measures taken to reduce the pace and magnitude of climate change (increased**

energy use efficiency; planting more forests; increased use of renewable energy sources to produce "green electricity)

- **Adaptation - Measures taken to reduce adverse impacts associated with climate disruption (shoreline retreat for human structures; rebuild beaches, dunes and salt marsh buffers; etc.)**
- *i.e. mitigation is designed to avoid unmanageable climate change, while adaptation addresses climate change effects that are unavoidable (See “Avoiding the unmanageable and managing the unavoidable” study by U.N. Scientific Expert Panel on Climate Change)*

Resilience: For socioecological systems refers to its ability to absorb a shock and maintain its basic capacity to function/maintain critical structural components (Boston Globe article on financial complexity and the inability to estimate systemic risk which lead to cascading effects/economic meltdown).

Community Advisory Committee: MOMP Ocean Advisory Council and MMS State Stakeholder Groups (federal, state, local and tribal representatives).

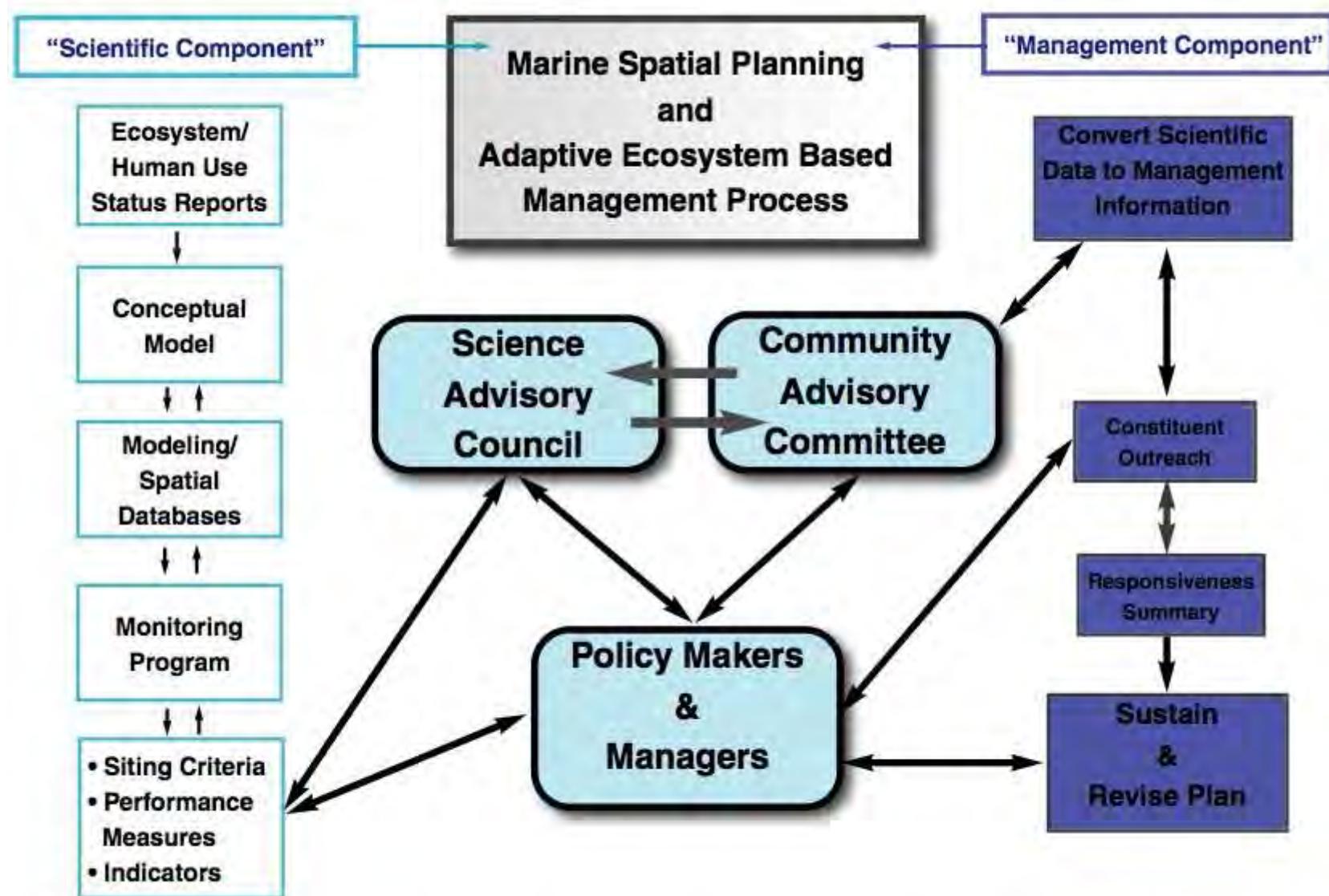
Constituent Outreach: those of us looking for community benefits and meaningful input on planning/implementation process for small scale community wind farms in state waters and large scale projects within the EEZ (reactive versus proactive involvement

* Waquoit Bay Watershed Ecological Risk Assessment Poster

Ecosystem Approach to Wastewater: Adaptive Management & Climate Change

David Dow

Sierra Club



Sierra Club / Comments on MOMP Draft Report / Marine Spatial Planning and Adaptive Ecosystem Based Management Process

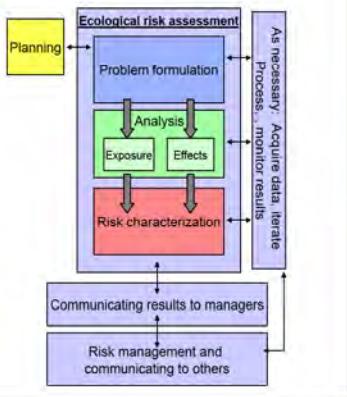
Waquoit Bay watershed ecological risk assessment project: Using science to support management

Dow, D. D., J. L. Bowen, V. Serveiss, and I. Valiela

1. INTRODUCTION



The watershed of Waquoit Bay has become rapidly urbanized. To assess and devise management actions to address these issues we used the ecological risk assessment process:



2. PLANNING

Management Goal

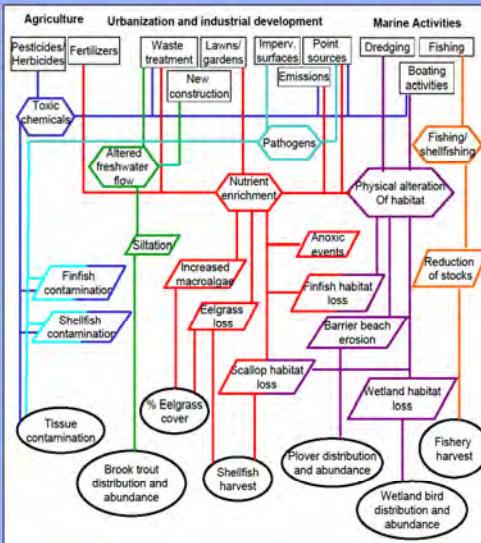
"Reestablish and maintain water quality and habitat conditions in Waquoit Bay and associated wetlands, freshwater rivers, and ponds to: (1) support diverse, self-sustaining commercial, recreational, and native fish and shellfish populations; and (2) reverse ongoing degradation of ecological resources in the watershed."

Management objectives

- Prevent eutrophication
- Reduce hypoxia and anoxia
- Prevent contamination of water and sediments
- Restore and maintain native fish populations
- Reestablish viable eelgrass beds
- Protect shellfish resources
- Reduce nuisance algal growth
- Maintain diversity of biotic communities

3. PROBLEM FORMULATION

Conceptual models help formulate testable hypotheses about the interaction between stressors and endpoints. We selected eelgrass area and scallop harvest as assessment endpoints.

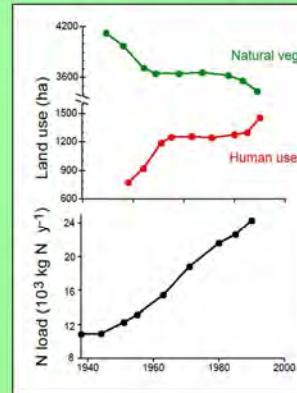


Assessment endpoints	Stressors				
	Chemical pollution	Altered freshwater flow	Nutrient enrichment	Alteration of habitat	Fishing pressure
Migratory fish	1	2	3	1	3
Stream species	1	2	2	1	3
Wetland habitat	1	3	2	2	1
Estuary trophic status	1	1	5	1	1
Eelgrass habitat	1	1	5	2	1
Benthic diversity	1	1	5	2	2
Estuarine nursery grounds	1	1	5	1	1
Totals	8	12	28	13	9

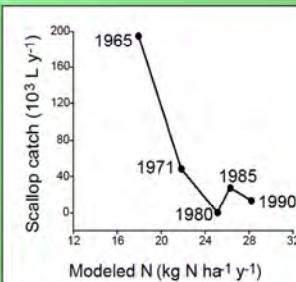
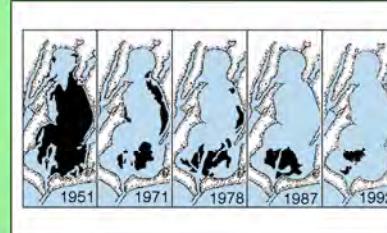
Values based on best judgement of scientists, and range from 1 = low impact to 5= high impact.

4. ANALYSIS

Exposure: Changes in land use leads to increases in N loads across decades

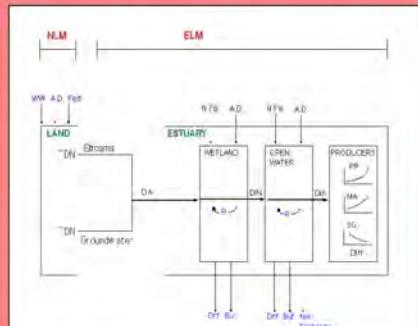


Effects: Increases in N loads result in decreases in the area of eelgrass beds, and in the amount of scallops harvested.



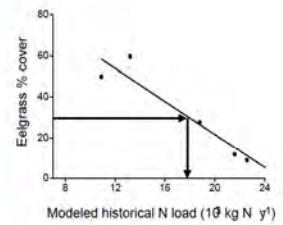
5. RISK CHARACTERIZATION

Use models (NLM and ELM) to develop links between nitrogen loading and ecological endpoints for example eelgrass area



Predict impact of N loads on eelgrass by:

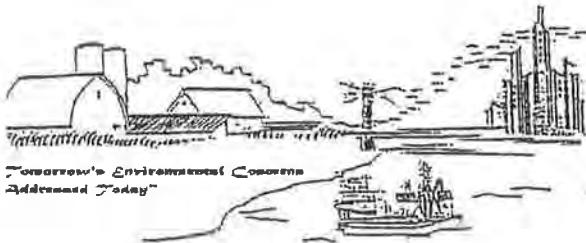
- Determine the desired % eelgrass cover
- Calculate N loads corresponding to selected eelgrass area.



- Use models to assess possible scenarios to reduce in N loads.

6. CONCLUSIONS

Ecological risk assessment provided a method to identify the relative impact of stressors, and synthesize information on measures of effect and assessment endpoints to produce a strategy for management and mitigation of effects of stressors.



Southwest Conservation District

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E-mail swcd43@sbcglobal.net Website www.conservect.org/southwest

*Building a Conservation Partnership Since 1946 with
Municipalities, Landowners and Cooperating Agencies: State and National
Servicing New Haven and Fairfield Counties*

June 24, 2013

Ms. Betsy Nicholson
Federal Co-Lead for Northeast Regional Ocean Planning
NOAA Ocean Service
Northeast Regional Office
55 Great Republic Drive
Gloucester, Massachusetts 01930-2276

Re: Comments on Draft Regional Ocean Planning Goals

Dear Betsy:

I attended the Public Meeting on Draft Regional Ocean Planning Goals in New Haven on Thursday, June 13, 2013, but had a conflicting commitment forcing me to leave before the end of the meeting. I was sorry to miss the closing discussions, and am submitting comments in this letter.

As a representative of the Southwest Conservation District, working with Long Island Sound municipalities along the western half of Connecticut's coast, I wasn't sure how towns and cities should or could be involved with ocean planning. The Regional Ocean Planning mandate appeared very broad and oriented to open ocean issues, but I'm making these comments on my assumption that coastal municipalities should be part of the planning goals.

While we know that coastal systems are linked and contribute or detract from the ecological health and economic productivity of the oceans, it would be helpful for the Northeast Regional Planning Body to reach out in a more focused manner to local governments and inform them how this plan has some effect in their jurisdiction.

In Connecticut, most land use and hence coastal policy originates from local municipal planning and development decisions as there is no county government. Consequently, municipal government is the critical link for many coastal decisions.

In response to growing concerns, a Shoreline Preservation Task Force was formed by Connecticut's Legislature, meeting during 2012. A report with recommendations from those meetings was issued on January 14, 2013 and reflects many of the concerns of coastal municipalities. It can be found at http://www.housedems.ct.gov/Shore/pubs/Task_Force_Report_Final.pdf

Ms. Betsy Nicholson
Page 2 of 2
June 24, 2013

Connecticut's coastline is changing and will continue to change, in some places dramatically. Recent large storms have made sea level rise and coastal inundation no longer theoretical discussions, but uncomfortable and expensive realities for coastal towns.

Coastal towns need access to more resources helping them understand options and envision positive change. Currently coastal inundation is viewed as income loss to towns due to emergency response, restoration to flooded infrastructure and property, and loss of property tax income. But coastal areas could be redeveloped better and safer, and provide alternative income streams. Ocean planning could go hand and hand with local community visions for the future.

The Southwest Conservation District is committed to working with our communities on a variety of issues, including the coast and nearby watersheds. Please keep coastal communities in the ocean planning loop, as these plans shouldn't evolve without input from these towns that have great effect on the near shore environments, but are also governed by changing conditions from their salt water neighbor.

Sincerely yours,



Martha M. Smith
Grants Coordinator
Southwest Conservation District

cc: Roman Mrozinski (SWCD)

July 26, 013

To The Northeast Regional Planning Body:

On behalf of Surfrider Foundation's 250,000 global supporters, including our five New England Chapters and thousands of members who visit New England's coast each year, thank you for the opportunity to weigh in on the Northeast Regional Planning Body's (RPB) draft goals.

Surfrider Foundation is an activist driven nonprofit environmental organization with over 87 global grassroots chapters that are dedicated to the protection and enjoyment of the world's oceans, waves and beaches through a powerful activist network. We are non consumptive ocean recreation enthusiasts, ranging from sea kayakers to divers to surfers to beach lovers and beyond, all working with a unified vision to protect and promote the health and vitality of oceans, waves and beaches.

Surfrider Foundation strongly supports the content and spirit of the RPB's draft goals, and in particular, the effective decision making goal. The current framework for decisions regarding ocean resources and use is fragmented, inefficient, cumbersome and based on incomplete information. The National Ocean Policy provides a common sense framework for sensible research and planning, to help organize the increasing demands on the ocean and coasts, with agency and public collaboration and effective decision making principles at the core. As such, Surfrider Foundation believes all the proposed actions associated with this goal are appropriate and necessary to achieve the goal. We prioritize action 3, which calls for public engagement.

Surfrider Foundation values the effort the RPB has exerted in creating a robust participatory process for public engagement in regional ocean planning thus far, and we feel strongly that effective decision making regarding the ocean, which is a public resource, must continually and dynamically evolve to afford and integrate the best means of public involvement possible. Continued requests for public input and feedback followed by transparent RPB consideration and response are key.

In addition, Surfrider Foundation fully supports the recommendations sent by the New England Ocean Action Network, of which we are an active participant, for the formation of a Regional Stakeholder Advisory Panel. From the NEOAN letter to the RPB, dated June 13, 2013, we encourage the RPB to:

Appoint a Regional Stakeholder Advisory Panel, which consists of diverse representation from the range of traditional, current and nascent ocean user groups in New England. We do not believe that utilizing existing state advisory panels is an appropriate way to encourage a crosscutting regional dialogue about a large, regional planning area. State by state advisory committees can be engaged at the discretion of individual states, but we believe strongly that the RPB should create and engage its own regional advisory panel.

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1. Surfrider Foundation, http://www.surfrider.org/images/uploads/publications/OR_rec_study.pdf.
 2. Data from the [National Oceanic and Atmospheric Administration, 2010](#).



Surfrider Foundation has been working to inform and engage non consumptive ocean recreation enthusiasts in the RPB process. With assistance from NROC, we hired an ocean recreation outreach intern in May, who helped build a database for our region's non consumptive ocean recreation enthusiasts and ocean recreation user reliant businesses. We are exploring various avenues for ocean planning outreach and are carefully tracking our methods and results. Preliminary outreach and engagement data will be available this fall, and we hope our findings will provide useful information for engaging our stakeholder group in regional ocean planning efforts.

The Surfrider Foundation also strongly supports the RPB's goal and proposed actions associated with a healthy ocean & coastal ecosystems. We would recommend enlisting public engagement to help clearly define *healthy ocean and coastal ecosystems*.

To this goal, we recommend adding an action that would create a regional assessment, serving to identify market and non market values of a healthy ocean and coastal ecosystem.

Surfrider Foundation conducted a study of Oregon's coastal recreation in 2010, which revealed that Oregonians enjoy significant market and non market benefits from non consumptive ocean recreation activities.¹ One difficulty identified through this study was in quantifying the value of coastal recreation; this difficulty stemmed from the fact that these activities generate both economic impact and economic value. Economic impact reflects the movement of money through the economy, which supports coastal communities and creates jobs. Value, on the other hand, includes the worth and benefit of an activity to the consumer, beyond actual costs. All recreation activities generate economic values that are uncalculated. Ocean recreation provides value for the participant beyond what is paid for, such as transportation, gear or lodging. Surfrider Foundation found that consumer surplus – that is, the value one *would* pay beyond the known costs to access a free resource, such as the ocean, waves or beaches – is important considering total value. For non consumptive ocean recreation, consumer surplus is the net value of an activity to the participant along with the net value brought to coastal businesses and communities. This value is difficult to quantify, as going to the beach, riding waves and enjoying the ocean, as a non consumptive entity, is generally free. For this reason, shoreline based recreation often gets undervalued in coastal management decisions. The ocean itself also adds vital non market value, as it plays a critical role in removing carbon from the atmosphere and providing oxygen. It regulates Earth's climate. We cannot easily assess a market value to this inherent worth of the ocean, but we must assign value, as the ocean is an integral part of our planet, with its own immense value beyond economic, spiritual and social benefits to humanity. These reasons are why we feel that the creation of a regional assessment, serving to identify market and non market values of a healthy ocean and coastal ecosystem, is needed.

One outcome we would like to see added to this goal is the avoidance of negative effects to the ocean & coastal ecosystem from existing uses and new development. Avoiding negative impacts on the ocean ecosystem needs to be a priority in order to effectively protect the ocean.

1. Surfrider Foundation, http://www.surfrider.org/images/uploads/publications/OR_rec_study.pdf.

2. Data from the [National Oceanic and Atmospheric Administration, 2010](#).



as well as all the life hat epends pon . Where voidance of negative impact is ot osible, a second tier outcome of minimizing negative impacts to the greatest extent possible must be in place. Compromising the health of the ocean is not in the best interest of the ocean or the public, and should therefore not be seen as an acceptable risk in ocean planning.

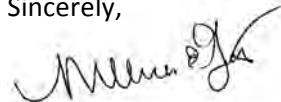
With regard to promoting compatibility among past, current, and future ocean uses, Surfrider Foundation supports this goal, including prioritized emphasis on minimizing user conflicts and impacts o nvironmental and cultural resources, recognizing local priorities, and increasing understanding and coordination among stakeholders. We would like o ee he protection of the environment and sustainable existing uses, such as non consumptive recreation, prioritized over any new uses, such as energy projects and private development.

In ddition, e would like to see this goal and supporting actions include a strong and explicit focus on assessing and protecting non consumptive recreational use. The majority of available data in the Northeast involving coastal recreation activities remains focused on motorized boating and recreational fishing, even though other non consumptive recreational interests contribute significantly to local economies,² while also contributing far less environmental impact than extractive uses.

Non consumptive ocean and coastal recreation encompass a broad spectrum of human uses and enjoyments, such as surfing, swimming, kayaking, diving, wildlife appreciation and hanging out on the beach. These activities are geographically and seasonally ubiquitous along New England's coast and are practiced by millions of residents and visitors annually. These uses provide major economic and social benefits to coastal communities and the region as a whole, and do not damage the ocean ecosystem. As such, Surfrider Foundation sees great opportunity for non consumptive ocean recreation activities to be assessed and protected through the Northeast regional ocean planning process, nd e rge he PB o explicitly clude hem this goal and associated actions.

Thank you again to each member of the RPB, and especially to those members of the RPB and of NROC who led the ten public meetings around New England this summer, informing about ocean planning, sharing these draft goals, and engaging in meaningful discussion with the public. Surfrider Foundation attended many of these meetings, which provided meaningful opportunity to engage in dialogue and consider the thoughts and concerns of other regional stakeholders, as we all dive into his regional ocean planning process together.

Sincerely,



Melissa Gates
Northeast Regional Coordinator
Surfrider Foundation

-
1. Surfrider Foundation, http://www.surfrider.org/images/uploads/publications/OR_rec_study.pdf.
 2. Data from the [National Oceanic and Atmospheric Administration, 2010](#).

SUBMITTED 06/27/13 12:25

DEAR MS. NICHOLSON,

PLEASE FIND ENCLOSED THE SIGNATURES OF JUST THE STAKEHOLDERS I COULD GET IN THE SHORT TIME ALLOWED, BUT I AM CERTAIN THEY REFLECT THE OPINION OF THE GENERAL POPULATION.

PLEASE KEEP ME INFORMED ON THE AFFECT OF OUR INPUT AS WELL AS THE PROGRESS OF THE OCEAN PLANNING PROCESS.

THANK YOU,

JIM TARANTINO
26 FORT SQUARE
GLOUCESTER, MA 01930
978-281-5822
TARANTINO_JAMES@YAHOO.COM

Petition:

To promote the importance of Healthy Ocean and Coastal Ecosystem to the Ocean planning group.
20 June 2013

We, the undersigned stakeholders, firmly believe "Healthy Ocean and Coastal Ecosystems" must be the first and foremost goal. The only way to ensure this goal is to implement a permanent moratorium on mineral extraction of any kind in, or around, our sacred fishing grounds. Responsible stewardship of our Ocean must protect against corporate rule."

First Name	Last Name	Address	Signature
JAMES	TARANTINO	26 FORT SQUARE	James Tarantino
Laurel	Tarantino	26 Fort Sq. Gloucester, MA	Laurel Tarantino
Margaret	Calkins	954 Washington St Gloucester	Margaret Calkins
Jane	COOK-MADIGA	23 R. Riverfront	Jane Cook-Madiga
Maria	Churchill	18 Juniper Rd.	Maria Churchill
TERRY	GREEN	3 WISE PLACE	Terry Green
Janelle	Dambroski	28 Gee Ave Gloucester	Janelle Dambroski
Ron	Ellis	13 Old Street	Ron Ellis
Tom		5 Old Bray	Tom
Joe	Palmisano	5 ST PETER'S LANE	Joe Palmisano
Robert	Modrags	23 R. Riverfront Rd Gloucester	Robert Modrags
Beverly	Jaschinski	28 Pleasant St	Beverly Jaschinski
Margot	Hanson	41 Wheeler St.	Margot Hanson
Dennis Golden	Dennis Golden	5-8 Main St. Rockport	Dennis Golden
Susan	Sanfilippo	11 Finch Lane	Susan Sanfilippo
Jesse	Browning	10 Trask St.	Jesse Browning
Libby	Browning	10 Trask St.	Libby Browning
JOE	SANFILIPPO	1 THORNHILL WAY	Joe Sanfilippo
Maren	Haymon	107 ATLANTIC PL	Maren Haymon
SUSAN	Morrison	8 Medlock	Susan Morrison
Susan	LaRosa	4 Harbour Hts. Gl.	Susan LaRosa
Herb	St. Iman	PO BOX #111 Gl. Ma.	Herb St. Iman
Rich	Leone	16 Leiby St	Rich Leone
Tom	Jarvis	10 Haskell St	Tom Jarvis
Robyn	McParr	30 Orchard St.	Robyn McParr
ELIA	di Angelo	809 WASHINGTON ST	Elia di Angelo
MIKE	Frontiera	819 Wash St	Mike Frontiera
LEONARD	LaRosa	4 HARBOUR HTS	Leonard LaRosa
Lillian	LaRosa	17 Cushing St	Lillian LaRosa
PETER	PARNITINO	1A Poplar Park	Peter Parnitino
Julie	Atkins	8 Lake Ave	Julie Atkins
Leeanne	Pallazola	7319 MOUNT HOLY CROSS	Leeanne Pallazola
Steve	McCrory	45 Main St #2	Steve McCrory
Geno	Mondello	140 EAST MAIN ST	Geno Mondello
EO	PARNELL	57 WARWICK ST.	EO Parnell
Frances	Mondello	140 Eastmain St	Frances M. Mondello

Petition to promote the importance of Healthy Ocean and Coastal Ecosystem to the Ocean planning group.
20 June 2013

First Name	Last Name	Address	Signature
STEVE	PANTHEES	638 Forest St. No. Andover	Steve Panthees
ED	COLLINS	9 Mandello Sq	Ed Collins
BROWNIE	CRAVENSTON	49 BENNETT ST	Brownie Craventon
ALEXANDER	CARNSTON	13 MERCET RD.	Alexander Carnston
SALVATORE	CAPOLLO	48 SUMMER ST	Salvatore Capollo
MARIO	SIMONE'S	6 Elm St	Mario Simone's
DAVID	POTTER	1 forest st.	David Potter
JENNIFER	WHITEHEAD	21 HAWTHORNE RD	Jennifer Whitehead
Charlotte	Chawnessian	32 Fort Sq.	Charlotte Chawnessian
Carrie	Scola	81 Glen Ave	Carrie Scola
Tom	SCOLA	66 Cleveland Place	Tom Scola
ROBYN PALMISANO	PALMISANO	5 ST PETER'S LN	Robyn Palmisano
STEWART	McGILVARY	143B PROSPECT ST.	Stewart McGilvary
Robert	MORIN JR	238 RMANST	Robert Morin Jr.
PAUL	NICASTRO	7 1/2 GLOUCESTER AVE	Paul Nicastro
PAUL	FAVARZIO	14 CHESTNUT ST	Paul Favarzio
JACK	Rodolosi	59 Main St	Jack Rodolosi
Michael	FRANCIS	24B Main St. Wethersfield	Michael Francis
VANDESS	ORLANDO	10 Octagon Way	Vandess Orlando
ANTHONY	CUSONNAH	6A Colvin St. Glou.	Anthony Cusonnah
EUGENE	DEAN	PO BOX 460 SEABROOK	Eugene Dean
DAVID	SOURCEA	85 CENTENNIAL AVE	David Sourcea
ANTHONY	PALARZOVA	594 Washington St	Anthony Palarzova
JAMES	HURST JR	15 STAKENNAUGH HTS	James Hurst Jr.
CHARLES	THIBODEAU	14 Bee St	Charles Thibodeau
Michael	NICASTRO	29 Main St. Apt.	Michael Nicastro
BOB MARINO	MARINO	26 Hartz	Bob Marino
JACK	Lombardo	24R High St. Napt	Jack Lombardo
Vincent	Orlando	2 Skytop Drive May	Vincent Orlando
GILBERT	MELLO	30 SHEPARD ST.	Gilbert Mello
Peter	Tarantino	408 Essex Ave	Peter Tarantino
John	FROST	5 Whittemore St.	John Frost
BELINIE	MALDONADO	4 SUMMER ST.	Belinie Maldonado
Richard	Balzarini	5 Pigeon Ln.	Richard Balzarini
Heidi	RINSON	29 Commercial	Heidi Rinson
RUSSELL	SHATTORD	95 MAPLEWOOD AVE	Russell Shattord
JENNIFER	MUINE	720 THE HEIGHTS CR	Jennifer Muine
Thomas	PARISI	19 Commercial St.	Thomas Parisi
Tony	DIAS	11 Commercial St.	Tony Dias

Petition to promote the importance of Healthy Ocean and Coastal Ecosystem to the Ocean planning group.
 20 June 2013

Petition:

To promote the importance of Healthy Ocean and Coastal Ecosystem to the Ocean planning group.
20 June 2013

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First Name	Last Name	Address	Signature
Janine	McGoverin	53 Fort Square	Janine McGoverin
Rona	Tyndall	914 Fort Sq Gloucester	Rona Tyndall
PETER	PARSONS	371 WASHINGTON ST.	PETER PARSONS
Vito	Demetri	1 Beach Ct	Vito Demetri
Sandra	Demetri	1 Beach Ct.	Sandra Demetri
Rosalie	DeLombardo	6 1/2 Sylvan St	Rosalie DeLombardo
DONNA	SMITH	28 EASTMORE AVE.	DONNA SMITH
Robertta	Peterson	2 Fort Sq	Robertta Peterson
Richard	Peterson	2 Fort Sq	Richard Peterson
Jacquelin	LAFIAM	38 Holly St	Jacquelin LAFIAM
John	LUCIDO	10 Fort Sq	John Lucido
HELENA	KENNEDY	28 MT PLEASANT AVE	Helena Kennedy
JOE	RANDAZZO	17 Commercial St	Joe Randazzo
Thomas	Brancaleone	67 Western Ave	Thomas Brancaleone
JERRY	Giallo JR.	101 Gloucester Avenue	Jerry Giallo Jr.
ROSAURIO	NOCD 217D	24 Burnham St	Rosauro Nocd
ALEXIS	NOVELLO	15 Burnham St	Alexis Novello
Joseph	Novello	24 Burnham St	Joseph Novello
Anthony	Saputo	13 Ferry St	Anthony Saputo
Thomas	Conrad	23 Sargent St	Thomas Conrad
Mike	Mitchell II	191 Essex Ave	Mike Mitchell II
S. Michael	Mitchell I	3 Waterside Ln.	S. Michael Mitchell
Jeff	Murise	720 Thayer Street	Jeff Murise
Mark	Daval	16 Eastern Ave	Mark Daval
Peter	Herrington	604 Post Rd., Greenland NH 03840	Peter Herrington
Erik	Dombrowski	28 Gee Ave Gloucester MA	Erik Dombrowski
Fran	Palaruso	191 Essex Ave Gloucester	Fran Palaruso
LORI	Keyes	8 Kitefield Rd Rockport	Lori Keyes
John	Gilligan	4 Hillside Rd	John Gilligan
Cynthia	Gilligan	4 Hillside Rd	Cynthia Gilligan
Michael	Calmo	8 Myball's Lane	Michael Calmo
Ruth	Thunier	14 Mt Pleasant Ave	Ruth Thunier
Edm	Novello	9 Seaview Rd	Edm Novello
STEVEN	Jackson	21 Pine St. Glou.	Steven Jackson
Richard	Randazzo	21 Cherry Glou.	Richard Randazzo
Kevin	Collins Sr.	Gloucester Ave	Kevin Collins Sr.

Petition to promote the importance of Healthy Ocean and Coastal Ecosystem to the Ocean planning group.
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First Name	Last Name	Address	Signature
FRANK	CATANIA	10 GILBERT RD.	Frank Catania
ANN Marie	SHIMANOSKI	80 Prospect St.	Ann Marie Shimanoski
BILL	DEVATTO	80 PROSPECT ST	Bill Devatto
ANNE	NIVASTRO	165 Wall St	Anne Nivastro
TACK	CARTER	300 CHESTNUT / No. Andover	Tack Carter
David	COX	42A Dennison St Gloucester	David B. Cox
Sherla	WILLIAMSON	10 Middle St	Sherla Williamson
JAY	SALAH	63 WESTERN AVE	Jay Salah
SAL	BENSON	26 Addison St	Sal Benson
JOE	GRILLO	26 Chestnut St	Joe Grillo
Anthony	AHCENS	125 Prospect St	Anthony Ahcens
Robert	PAFFERL	42 FORT Sq B1	Robert Pafferl
Brandon	MOLLOY	38 Fort Sq	Brandon Molloy
Rana	TYNDALL	44 Fort Sq.	Rana Tyndall
PHIL	PARISI	58 Wheeler St.	Phil Parisi
JENNIE	PARISI	16 Poplar St	Jennie Parisi
Joseph	PARISI	11 Poplar St	Joseph Parisi
John Mally	MOLLOY	38 Fort Sq	John Mally
Jeff	DUNLEAVY	32 Fort Sq	Jeff Dunleavy
FRANK	COTTER	1 Ryer Rd	Frank Cotter
SHIRLEY	EDMUNDSON	6 Beaufort Ave	" "
WM Edmundson		" "	
FIN	TENDERS	2 Fort Sq	Fin Tenders
MARY	PORTER	1662 Western Ave	Mary Porter
ANNETTE	TARANTINO	2 FORT SQUARE	Annette Tarantino
Ann	MOLLOY	238 Magnolia Ave Gloucester	Ann E. Molloy
DAVE	PLEIMAN	238 Magnolia Ave Gloucester	Dave Pleiman
JUDY	ROSE	341 Essex Av Gloucester MA	Judy Rose
Trevor	ADKINS	8 Lakrose Ave Gloucester	Trevor Adkins
Joe	INTERANTE	5 Rainbow Lane Gloucester	Joe Interante
John	MITCHELL	3 Walross Ave Gloucester	John Mitchell
Steve	LeBlanc Jr	1 Carlisle St Gloucester	Steve LeBlanc Jr
VIXA	COUVREUR	71 Magnolia Ave	Vixa Couvreur
Megan	GODDARD	54 Curtis St	Megan Goddard
Sam	ROSE	22 Calder St	Sam Rose
Sarah	WOKTIN	112 Bass Ave	Sarah Woktin
ANNE	ROSL	22 Calder St	Anne Rosl
Alessandra	RUSSO	90 Western Ave	Alessandra Russo
Karen	CONANT	13 Chapel St	Karen Conant

Petition to promote the importance of Healthy Ocean and Coastal Ecosystem to the Ocean planning group.
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Petition:

To promote the importance of Healthy Ocean and Coastal Ecosystem to the Ocean planning group.
20 June 2013

We, the undersigned stakeholders, firmly believe "**Healthy Ocean and Coastal Ecosystems**" must be the first and foremost goal. The only way to ensure this goal is to implement a permanent moratorium on mineral extraction of any kind in, or around, our sacred fishing grounds. Responsible stewardship of our Ocean must protect against corporate rule."

Petition to promote the importance of Healthy Ocean and Coastal Ecosystem to the Ocean planning group.
20 June 2013

On Tue, Jun 4, 2013 at 10:49 AM, Kim Tucker <k.ervintucker@gmail.com> wrote:

As Contacts for the NROC I am writing on behalf of my clients TBNT (Thanks But No Tank). TBNT is a group of individual residents and business owners in the Penobscot Bay Region of Maine, committed to protecting Pen-Bay of over-industrialization and to preserving our eco-tourism, lobstering, and real estate based economy. Our way of life in the communities in and around Penobscot Bay has been endangered by recent attempts to further industrialize the port of Searsport. It is now being endangered by an ill-conceived, poorly researched, and unnecessary proposed "improvement" dredging proposal by the Army Corps of Engineers and Maine Department of Transportation.

The sole beneficiaries of this proposed dredging project identified by the Corps are two foreign-based oil companies (Sprague Energy and Irving). The purpose of the project is to encourage more oil supertankers and other deeper draft vessels to use the port of Searsport at Mack Point. The justification for this project is to deepen the harbor channel and pier area at Mack Point from the current 35' depth to 40' in the channel and up to 43' at the piers so that Sprague and Irving can use fewer, larger tankers to service this port and save these private companies the cost of waiting for tides to offload vessels. There is virtually no public benefit identified for the expenditure of more than \$13 million state and federal taxpayer dollars fro this project — in fact this project will likely reduce jobs in the region and have no guaranteed costs benefit for consumers — only and increase in profits for Sprague and Irving.

The proposal envisions dredging almost a million cubic yard of contaminated dredge material from the upper estuary of Pen-Bay and dumping these dredge spoils off Islesboro, Belfast and potentially Vinalhaven, North Haven and Rockland into areas of the Bay that are prime lobstering ground with little such contamination and pollution now. where only 32,000 cy need to be dredged to maintain the existing channel more than 900,000 cy would need to be dredged from this "improvement" dredging. The area where the dredge material would be removed is known to contain many contaminates including mercury. None of the prior reports on the presence of such pollution was considered in the feasibility study (according the the Corps' own reports) and the core samples taken in 2007 and 2008 (the last testing done to support this 2013 FSEA draft) were grossly inadequate to identify potential contaminates (going down only 2' rather than the 8' to 11' required to determine the nature of the materials at issue and not taken from all proposed dredging areas).

It is my understanding that your group will be holding a meeting tonight in Rockland. I just learned of this meeting this morning and I am not in Maine today to attend. I have forwarded the information on the meeting to my clients in hopes someone from TBNT can attend. The email addresses for the TBNT Board of Directors (Anne Crimaudo, Steve Tanguay, Tom Gocze, Ted Kessler, and Tara Hollander), our coordinator (Ken Agabian) and my co-counsel for TBNT (Steve Hinchman) are all above and copied with this correspondence.

Below, I am attaching the letters we and other key representatives have sent to the Corps in opposition to the proposed dredging project in Penobscot Bay. These letters contain all of the background information on the proposal and the reasons for our opposition. We hope that you will include this information in your meeting minutes for the Rockland meeting and in your

consideration of matter requiring attention by your group. Penobscot Bay is in need of immediate attention to protect this precious and irreplaceable national treasure from being lost to short-sighted efforts to industrialize this area. We have many other means to obtain affordable energy products in this country and the State of Maine without destroying the beauty and integrity of Penobscot Bay's ecology and marine environment and without adversely impacting the significant industries in the area that rely on maintaining the pristine nature of the Bay for their success including: lobstering (40% of the Maine lobster harvest comes from Pen-Bay), real estate, and eco-tourism.

Please add my name and our group's members to your mailing lists for notices of future meetings in the region and we will make sure to attend those and please consider our submissions. If you wish to discuss our positions and concerns further, please contact me at [202-841-5439](#) (my cell number). After July 1 I will be at my home on Islesboro full-time — I am a year-round resident of Islesboro. The number there is: [207-734-2250](#).

TBNT Letter to Corps

IIT's letter to the Corps

Gov. Baldacci's Letter to the Corps

Sierra Club of Maine

Petition from Lobstering families in Vinalhaven and North

Northeast Regional Planning Body

Public Meetings on Draft Regional Ocean Planning Goals

Public Comment Form

Please share your feedback on the Northeast Regional Planning Body's draft regional ocean planning goals. We will compile your input with the rest of the feedback received during the public comment period.

The public comment period is open from May 23 to June 28. You can provide input in one of three ways:

- Online, through the NROC web form at <http://northeastoceancouncil.org/comment-on-the-draft-ocean-planning-goals/>. Please note that the web form gives you the option of submitting comment letters.
- On paper at our public meetings.
- Verbally at the public meetings during the public comment portion of the agenda.

If you would like to be certain that your comments are captured verbatim, we encourage you to submit them via the online web form.

You can either submit your written comment form at the meeting, or mail in after the meeting to:

Betsy Nicholson
Federal co-lead for Northeast regional ocean planning
NOAA Ocean Service
Northeast Regional Office
55 Great Republic Drive
Gloucester, MA 01930-2276

We are interested in your thoughts on the questions below, which are specifically tailored to the draft goals and example actions, but welcome your comments in general on other related topics of interest. A main purpose of the questions is to obtain your input on priorities to help identify opportunities for near-term progress through 2015.

Date:

Email:

Location:

Affiliation:

Full Name:

Draft Goal One: Effective Decision Making

1. Which aspects of draft Goal One and example actions do you like or would you change and why?

I like

I would change

2. Of the example actions under draft Goal One, please check those you think should be the priorities.

- a. Incorporate regional data and maps into regulatory processes.
- b. Increase interagency coordination across management and regulatory programs.
- c. Inform and engage the public for better decision making.
- d. Coordinate and leverage science, traditional knowledge, and data development to address regional priorities.
- e. Conduct regional cumulative impacts analysis using improved environmental and ocean use information and data.
- f. Other

Other thoughts on draft Goal One you would like to share?

Draft Goal Two: Healthy Ocean and Coastal Ecosystems

1. Which aspects of draft Goal One and example actions do you like or would you change and why?

I like

I would change

2. Of the example actions under draft Goal Two, please check those you think should be the priorities.

- a. Map species and habitats; assess trends.
- b. Working within existing regulations and authorities, use publically accessible maps and trends to define and characterize important, significant, or valuable areas.
- c. Identify geographic areas and species that are important for sustenance.
- d. Identify opportunities within existing regulations and authorities for restoration and protection.
- e. Model future environmental conditions, such as potential climate change effects on species' habitat, distribution, and/or abundance.
- f. Prioritize science and research needs to fill key gaps in knowledge.
- g. Other

3. Other thoughts on draft Goal Two you would like to share?

Draft Goal Three: Compatibility Among Past, Current and Future Ocean Uses

1. Which aspects of draft Goal Three and example actions do you like or would you change and why?

I like

I would change

2. Of the example actions under draft Goal Three, please check those you think should be the priorities. If you feel action c below is a priority, please identify priority items from the list below action c.

- a. Identify and where possible map existing uses (fishing, boating and other recreation, shipping and commerce, etc.) and related infrastructure. Identify practical implications of new and changing activities on the regional economy and environmental and cultural resources (including potential paleocultural resources).
- b. Identify and map cultural and historic sites.
- c. Enhance viability of and compatibility among new and existing ocean uses, specifically by considering the following, drawing upon existing sources of information where available and appropriate.
 - i. Assess current and foreseeable trends in maritime commerce, particularly related to potential implications of short-sea shipping, the widening of the Panama Canal, and other economic drivers.
 - ii. Assess current and foreseeable trends in commercial fishing in New England, relying on information available through fisheries management efforts.
 - iii. Assess current and foreseeable trends in ocean-based renewable energy development on the regional economy, compatibility with other existing uses, regional electricity transmission, and other related issues.
 - iv. Assess potential for offshore aquaculture, particularly considering the regional nature of this ocean planning effort, existing federal regulatory framework, and technology trends.
 - v. Assess current and foreseeable uses of seafloor material (extraction for beach nourishment or siting of disposal areas), considering recent storms and related federal

and state responses, long-term trends, needs for disposal of dredged material, and related issues.

___ vi. Assess existing shore-side infrastructure that directly affects ocean habitats and species (combined sewer overflows, discharges, etc.) and assess need for improvements.

___ d. Other

3. Other thoughts on draft Goal Three you would like to share?