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RE: Comments on Draft Northeast Regional Ocean Plan

Dear Regional Planning Body Co-leads:

The Chamber of Shipping of America (CSA) is a membership based organization that acts as a subject matter expert on maritime issues and those domestic and international legislative, regulatory, and administrative issues that fall under our expertise. We represent a membership of United States based companies that own, operate, charter, or maintain a commercial interest in ocean-faring tank, container or dry bulk vessels operating in both domestic and international economies. With more than thirty organizations depending on our representation, we speak for a diversity of interests including freight, oil and gas transportation, marine spill response, marine vessel inspection, and technology development over a wide array of ocean faring industries.

Our goal is to work with legislators to find a sustainable combination of environmentally responsible policies and viable maritime operating practices for our members and the ocean transportation industry as a whole. This will ensure that the strong marine transportation economy will remain one of the Northeast's assets while also contributing to the improvement to the health of our shared ocean resource.



We applaud the work of the Northeast Regional Planning Body (RPB) on the development of the draft Northeast Ocean Plan. We have been highly engaged in the planning process and are happy with the RPB's engagement of the maritime community. Overall, we urge the RPB to continue to:

1. Advance the maritime data within the Northeast Ocean Data Portal;
2. Clarify the important ecological framework;
3. Commit to the objectives to improve agency coordination;
4. Continue robust outreach to the maritime community;
5. Consider a mechanism for stakeholder input on plan performance; and,
6. Ensure harmonization with the Mid-Atlantic on shipping data.

Narrative description of the future trends and needs of the maritime industry are helpful for agencies making decisions on how potential development projects could affect our industry. Specifically, the shipping industry operates at a large scale. The cumulative impacts over time to navigate around, for example offshore wind, can add up to hundreds of thousands of dollars in lost revenue over the course of a year simply in fuel costs. This in turn, has an effect on the economy and the price of goods. Understanding the complexities of our industry will help ocean managers make better, more informed decisions. We urge the RPB to revisit the future trends and needs of our industry when updates to the ocean plan occur. Specifically, holding sector specific engagement opportunities and generating products like the *NROC White Paper: Overview of the Maritime Commerce Sector in the Northeastern United States*¹ are a good start to elucidate needs and trends of the industry. Additionally, these products are simple and effective when a large, dispersed sector such as the maritime industry need to review for accuracy. **We urge the RPB to make commitments to update and review information with the shipping industry.** The Chamber is eager to engage our members as necessary.

The Northeast Ocean Data Portal is a crucial component of the ocean plan and must be updated with appropriate maritime data over time. Maps on navigation and commercial traffic are valuable for those making decisions and working to address these regional, cumulative impacts discussed above. However, this data must continue to be updated as new information is obtained. RPB agencies must commit to providing additional data through new analyses (*as outlined in Maritime Transportation Action Two*). We also agree with the U.S. Coast Guard (USCG) and maritime transportation sector recommendations to review Automatic Identification System (AIS) data for monthly and seasonal traffic variability. We have heard conflicting viewpoints on the future of AIS data; however, from a shipping perspective, it is imperative that AIS data be maintained. While we understand that data collection and management is costly, **AIS must be a priority.** Overall, advancements and updates to the data portal are key to the ocean planning process. **We strongly urge the RPB to identify and commit to the long-term maintenance of the data portal with ample funding to ensure future success of the regional ocean plan.**

¹ Kite-Powell, H. 2013. [NROC White Paper: Overview of the Maritime Commerce Sector in the Northeastern United States](#).



The Chamber sees the value and need to be inclusive of all data and information on our ocean including both ocean user and marine life data. The shipping industry strives to be good environmental stewards and we see the value in agencies and ocean users having access to marine life datasets. We urge the RPB, however, to clearly define a transparent process for important ecological areas. We understand the value in this framework approach but would like a clearly defined, transparent process to continue that gives all stakeholders a comfort level with which we can move forward together in support of the framework and identification of important ecological areas. There are numerous data sets and approaches in other contexts that seek to define areas important ecologically; we urge the RPB to clearly articulate how these will add or differ to ongoing work and, more importantly, **commit to an open, transparent, and scientifically-driven process.**

We were happy to see agency commitments to improve coordination, especially with respect to USCG, MARAD, and Army Corps of Engineers. We fully believe that better coordination among the agencies managing our waterways results in better decisions for the shipping industry; USCG, MARAD and USACE are important voices for the shipping industry in federal decision-making. Our hope is that USCG will continue to be a leader in regional ocean planning. We support the commitments from RPB agencies like the USCG to understand the navigation risk profile. A commitment from USCG to facilitate pre-application discussions with potentially affected stakeholders is also of the utmost importance. **We urge the RPB agencies to fully commit to these actions and for USCG to continue to take a leadership role.**

The commitment to continue engagement with potentially affected ocean users before a proposed project occurs offshore is of the utmost importance to the Chamber and our members. As we discussed above, cumulative impacts of proposed projects can be incredibly devastating to the shipping industry.

RPB agencies must clearly define and hold firm on their commitments for enhanced stakeholder engagement. From our perspective, the strength of the Northeast Regional Ocean Plan is the commitment to coordinate better among federal, state, tribal, the Northeast Fishery Management Council, and ocean users. We know that RPB agencies will need to be flexible in the nature of their individual outreach to stakeholders; however, we urge the RPB to take these commitments seriously and outline a plan of action for how agencies will identify stakeholders more effectively within the decision-making process.

The ocean plan performance and monitoring should include a mechanism that allows stakeholders to provide input on plan performance and petition the RPB to address a specific management issue. This approach could take on many forms, but allowing stakeholders to request the RPB to discuss improvements to the plan has the benefit of improving future iterations of the plan while also enhancing stakeholder engagement. This type of stakeholder input during plan implementation could greatly enhance the performance and monitoring evaluation of the ocean plan.

Lastly, the shipping industry operates at a global scale. We urge the Northeast RPB to work with the Mid-Atlantic to ensure harmonization of policies, data, and practices as it pertains to the shipping



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industry. We agree that a regional approach is the appropriate lens through which to plan, but simply ask for some consistency when shipping is being considered. A better understanding from decision makers on the scale at which our members operate will lead to more informed decisions that support our shipping economy.

Thank you for the opportunity to comment on the draft Northeast Ocean Plan. We congratulate the RPB on the progress made to date and hope our comments will be taken to make improvements to the benefit of our members.

Sincerely,

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