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RE: Comments on the Draft Northeast Regional Ocean Plan

Dear Regional Planning Body Co-leads:

As a commercial lobsterman, I spend my days on the waters between Point Judith and Block Island, and I am seeing firsthand the growing activity shaping up on our coasts and oceans. I am more than a little nervous about all of these new industries and how they will affect the diverse and dynamic commercial fishing and seafood industry that Rhode Island is so well known for. We harvest, process, and distribute many different species and contribute millions of dollars to Rhode Island's economy, not to mention thousands of jobs. According to NMFS, in 2012, commercial fishermen in New England landed 664 million pounds of finfish and shellfish, earning \$1.2 billion in landings revenue. Landings revenue was dominated by American lobster at \$424 million.

As new and emerging industries threaten our historic fishing grounds, we realize that we need to look to the future and prepare ourselves to plan for and mitigate these upcoming challenges. As fishermen, we know we don't own the ocean, but we most certainly want to be involved in any decisions that might adversely affect where we fish.

In Rhode Island, the Ocean Special Area Management Plan (SAMP) recognized that the development of offshore renewable energy may affect fishermen through the loss of access to fishing grounds, potential decrease in fish caught during construction and operation of an offshore renewable energy project, loss of gear, and possible vessel collisions with new structures. In response to that concern, the Fishermen's Advisory Board (FAB) was developed and represented by local fishermen like myself. Our job is to provide advice to Rhode Island's Coastal Resource Management Council on the siting and construction of other uses in Rhode Island's marine waters.

Using the Fisheries Advisory Board (FAB), the state considered key fishing grounds in the creation of a wind area off of Block Island. Thanks to a collaborative planning effort, and transparent stakeholder engagement, some of Cox's Ledge was removed from consideration for development. It was a relief to know that our nation's first offshore wind farm would be sited in an area with minimal impact to

important fishing grounds. Above all, I would like to see this type of collaboration continue, and expand beyond Rhode Island to benefit all ocean waters across New England.

I am excited to see the progress the Northeast Regional Planning Body (RPB) has made to date on the regional ocean plan. I think this plan is a nice complement to the work done in Rhode Island with the Ocean SAMP and offers a nice extension into federal waters. I would like to offer my comments on three aspects of the draft Northeast Ocean Plan:

1. Long-term commitments to continue updating commercial fisheries data and information
2. Prioritizing lobster and gillnet data to fill identified data gaps
3. Strong RPB commitments to continue stakeholder engagement with fishermen

The narrative component of Chapter Three that describes information and data on commercial fisheries is a vital component of the regional ocean plan and must be updated accordingly as new information is available. Decision makers often do not understand the regional and dynamic nature of fisheries and the challenges fishermen face on the water. I applaud the RPB for their description of the complexities regarding fisheries and how newly proposed activities can affect fisheries. I urge the RPB to continue this dialogue with the fishing industry and revise narrative descriptions accordingly. Specifically, the lobster information must be updated as better regional data is gathered through research. Additionally, a lobster characterization study was recently conducted by Battista *et al.*, 2016.¹ This study outlines important contextual information about the fishery including concerns of lobstermen. This research can serve as a starting place for constructive dialogue surrounding the lobster and gillnet fishery and should be a reference cited either within the plan itself, its appendices, or the data portal. For the ocean plan to be successful in the future, an open dialogue with fishermen must continue and RPB agencies must commit to updating information relevant to fishermen with clear, defined processes and timelines for plan revisions.

The Northeast Ocean Data Portal is an essential component of the regional ocean plan and data contained within the portal will be a key reference point and screening tool for potential areas of conflict. Because of the value of the data within the portal, RPB agencies must prioritize filling data gaps on the lobster and gillnet fishery. As noted within the plan, spatial data related to the lobster fishery across the region is relatively limited at a useful scale. While highlighting that this data gap exists in the science and research priorities is a first step, working to fill this data gap is essential to future iterations of the plan. I encourage the RPB to prioritize filling this data gap and to work with interested lobster fishermen to define research agendas and prioritize data gathering areas.

In order to ensure the long-term reliability of the narrative and spatial data I have called out as so important above, I also strongly urge the RPB to identify a stable and durable funding source for that data. We in the fishing industry want to be able to work with you to implement the plan's commitments to collaborative decision-making and early engagement. Our ability to help you turn those promises into reality in turn depends in on everyone's ability to rely on the data and data portal around which the plan is built.

Finally, stakeholder engagement is a valuable component of the regional ocean plan. From my experience in Rhode Island with the SAMP and working with Deepwater Wind and fishermen, this early coordination and engagement is crucial to the success of any proposed project and the only rational way

¹ Battista, N., Uchenna, R.C., Belknap, S. and Lapointe, G. 2016. *Lobster and Ocean Planning. A Spatial Characterization of the Lobster Fishery for the New England Regional Planning Body.* Island Institute.

to avoid ocean user conflicts. I urge the RPB to hold firm on the commitment to engage potentially affected stakeholders early in permitting processes, especially with respect to the fishing community. As I noted above, the data portal and narrative descriptions in the plan provide an important base of understanding for the agencies, and a practical way to flag that fishermen are present in an area and could be affected. But once a potential conflict is flagged, active and early stakeholder engagement is the key to actually understanding and addressing potential problems effectively. The RPB should work to explain in more detail how member agencies will conduct outreach to us or, as was done in Rhode Island, work with us to figure out solutions to proposed projects. As fishermen, we need clarity on how we will be engaged in the future. As part of the implementation of the plan, I would be happy to work with RPB representatives to identify the right approaches and processes for engaging the fishing community in both the ocean plan itself and in individual agencies' decision-making processes, as we were able to do through the FAB in Rhode Island.

I congratulate the work to date on the Northeast Ocean Plan. I look forward to your continued engagement with lobstermen. Thank you for the opportunity to provide comments.

Sincerely,

William McElroy
Chairman
Fishermen's Advisory Board to CRMC