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Betsy Nicholson, NE RPB Federal Co-lead
National Oceanic and Atmospheric Administration
National Marine Fisheries Service, Northeast Regional Office
55 Great Republic Drive
Gloucester, MA 01930-2276

July 25, 2016

Dear Ms. Nicholson and NE RPB,

Thank you for taking the lead and drafting the first-in-the-nation Regional Ocean Plan. New England's marine waters define our character and shape our lives. For over a quarter century, Friends of Casco Bay has monitored and advocated to restore and protect the health of Casco Bay. Our comments therefore focus mostly on portions relating to Casco Bay.

First, we support the Draft Plan and offer our comments to supplement it. We support the concept that the Plan is a fluid and adaptable document, meant to foster interagency cooperation, exchange of information and informed decision-making. The Data Portal and appendices provide relevant information, and as is so aptly noted in the Plan, provide an excellent starting place for environmental decision-making; applicants and decision-makers must supplement information obtained through the Data Portal with more localized information. **To maintain the usefulness of the Data Portal, adequate funds and dedicated staff must be identified to maintain and update the Data Portal, or it will quickly become obsolete.** We hope that this goal can be incorporated more clearly into the final plan.

Second, with respect to the Data Portal, **the Draft Plan correctly notes the need for better information regarding Maine's lobster fishery and also could incorporate more localized data regarding important shellfish beds in Maine.** Our review of this data layer revealed it to be incomplete. This information may be important for many federal purposes, including oil spill response.

Third, with respect to habitat, we agree with the identification of eelgrass beds as an important habitat and as a priority for restoration. **In Maine, we suggest also including rockweed (*Ascophyllum nodosum*), as this critical habitat for fish, birds and invertebrates has been subject to significant harvesting pressures and has shown ill effects from overharvesting in the northwest Atlantic.** Including critical rockweed beds in your Plan and Data Portal will augment the federal plan because rockweed serves as nursery habitat for many valuable marine species including lobster, cod, Pollock, and marine waterfowl. To illustrate the strain on Maine's rockweed resource, consider that seaweed landings in Maine are exceeded in volume only by herring and lobster landings.¹ For the past five years, between 15,000,000 and 19,405,000 pounds of seaweed has been harvested each year, with most of that

¹ <http://www.maine.gov/dmr/commercial-fishing/landings/documents/2015PoundsBySpecies.Pie.Graph.pdf>.

harvest being rockweed.² As a result, last month Maine's seaweed festival was cancelled, in part, out of concern for the sustainability of this rapidly growing industry.³

Fourth, with respect to aquaculture, this is a growing industry in Maine which is expanding to include intertidal shellfish aquaculture. **The team tasked with tracking and updating data should note this and include intertidal aquaculture leases or permits in its mapping.** This information can be obtained from Maine's Department of Marine Resources. Having complete, accurate, and up-to-date aquaculture information will help tremendously in rapid response situations, such as oil spills. The information also can be used to help identify regions for priority restoration efforts.

Fifth, with respect to priority restoration projects identified in the Data Portal, we request that you include the New Meadows River, in the northern region of Casco Bay. The New Meadows River has been listed as a 303(d) impaired water body for over a decade. Its current impairments include dissolved oxygen (DO), bacteria, and nutrients due to several roads built across the river restricting tidal flows and circulation, including one road in the early 1900s and one in the 1960s. At one point in the middle river, our test data showed a DO reading of zero. A New Meadows River Partnership formed about a decade ago successfully eliminated overboard discharges and other point source discharges to New Meadows. The remaining impairment is caused by the roadways and can be remediated by adequate funds to create more passage beneath the roadways to restore tidal flow. More information about the area can be obtained at: www.newmeadowspartnership.org/. The restoration of this area should receive priority status because of its intensified use for aquaculture, its important shellfish beds, its recreational opportunities, and the fact that much of the leg work preparing for the restoration has been done. Although the project is not "shovel-ready," it is ripe for a grant to complete the monitoring, engineering and public outreach efforts needed to make it shovel ready.

Sixth, with respect to science and research priorities, we believe the impacts of climate change, including species migration, rising ocean temperatures, rising sea levels, intensified storms, and ocean acidification should be the top priority.

Finally, the plan fails to mention reduction of stormwater pollution, mitigating combined sewer overflows (CSOs), and reducing nutrient pollution as "restoration areas." The plan should be expanded to include areas where wastewater treatment facilities, CSOs, and stormwater make major contributions to degrading marine water quality, so federal funds can be identified to help restore those areas. Although many of the impairments occur in state waters, they are regulated under the federal Clean Water Act (which the EPA enforces in some states in New England), and these impairments negatively impact habitat and species managed under other federal laws referenced in the plan. We therefore believe that identifying federal funds to reduce these sources of pollution must be a priority in any ocean plan.

² <http://www.maine.gov/dmr/commercial-fishing/landings/documents/11-15LandingsBySpecieswithBonus.Table.pdf>.

³ <http://www.pressherald.com/2016/06/26/rift-over-sustainability-leads-to-cancellation-of-maine-seaweed-festival/>.

Thank you for the opportunity to comment on the draft Northeast Regional Ocean Plan. We look forward to seeing the final version, and we commend you for your leadership in drafting the plan.

Sincerely,



Ivy Frignoca

Casco Baykeeper

Friends of Casco Bay