



CITY OF NEW BEDFORD

JONATHAN F. MITCHELL, MAYOR

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Ms. Betsy Nicholson
Federal Co-Lead, NE Regional Planning Body
Northeast Regional Coordinator
National Oceanic and Atmospheric Administration
National Marine Fisheries Service, Northeast Regional Office
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Mr. Bruce Carlisle
Director
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RE: Comments on Draft Northeast Regional Ocean Plan

Dear Regional Planning Body Co-leads:

Thank you for the opportunity to comment on the draft Northeast Ocean Plan. The work the Northeast Regional Planning Body (RPB) has done to date has involved significant outreach and we hope our comments will be used to strengthen the ocean plan and bring about a new era of stakeholder-driven cooperation for ocean users.

The Port of New Bedford is the key driver of the local economy. According to a recent economic assessment by Lancaster, PA based Martin Associates, the port supports 36,578 jobs (6200 direct) and creates \$9.8 billion in economic activity, fully 2% of the Gross Domestic Product (GDP) of Massachusetts.

New Bedford is world-renowned for its dominance of the commercial fishing industry in the United States. According to NOAA Fisheries, 140 million pounds of fish are offloaded in New Bedford, valued at \$329 million, making the harbor the nations #1 valued fishing port. Fully 33% of the value of fish landed in New England and 66% of the value of fish landed in Massachusetts are offloaded in New Bedford. An average of 300 commercial fishing vessels is docked within New Bedford Harbor on any given day, and hundreds more utilize the port's offloading services.

As the manager of all municipally-owned assets in New Bedford Harbor, the Harbor Development Commission (HDC) has a strong connection to the fishing industry. Ensuring the fishing industry and its related businesses remain viable, growing enterprises is the HDC's primary economic development goal. As Chairman of the HDC, I wish to convey on behalf of my fellow Commissioners our belief that the ocean planning process has the potential, if pursued responsibly, to benefit our fisheries and fishermen by providing policy makers and regulators with a clearinghouse of data from multiple sources and enabling more strategic decision-making and nuanced policy formation.

There are two hallmarks of a responsible approach to ocean planning: First, to be most effective, the ocean planning process must utilize data from multiple academic institutions, cooperative research, offshore wind developers and other ocean users. Second, the plan must encourage the multiple agencies involved in the management of fisheries to draw on this data and ensure its use in the scientific modeling that underpins fisheries management. Use of the data collected as part of the ocean planning process creates an important new opportunity for grounding management decisions on the best available science, and this is vitally important given the broad consensus in the fishing industry that presently the best science is too often not being given the consideration it deserves.

One of the strengths of the ocean planning Data Portal is that it utilizes a broad variety of data sources. We need to build on this and create as robust a collection of data sources as possible. Toward that end, there needs to be a mechanism for peer-reviewed research from intuitions, like that being generated by UMass Dartmouth's SMAST, to be incorporated into the Portal and thereby into policy and management decisions.

While the incorporation of new peer-reviewed data sources from a variety of research institutions is of great importance to the Port of New Bedford, there are two complementary efforts that also ought to be pursued: First, RPB agencies must commit to updating and maintaining data and information within the Portal as well as provide long-term funding for the Portal. Second, the RPB must also work to develop additional data for fisheries not reflected in the Data Portal, including recreational fishermen as well as the lobster and crab fisheries.

There has been a push recently to use the Antiquities Act to designate a marine monument in the Atlantic Ocean. We are concerned that the transparent, multi-year planning process developed by the RPB that led to the creation of this draft will be overshadowed, confused with, or overtaken by the parallel and opaque process of designating a monument in the waters off New England. The fact that the White House Council on Environmental Quality is reviewing and approving both the Regional Plan and the potential monument designation is of serious concern. The RPB needs to make clear how the approval processes are different and ensure that this planning process is not construed as a public process conducted in conjunction with a potential marine monument designation.

We also have deep concerns about the precedent of a unilateral process that can be used to manage access and uses of our oceans through the establishment of "Important Ecological Areas" (IEAs). The Port of New Bedford and local fishing interests have been active participants in the New England Fisheries Management Council and are directly impacted by the decisions made by the NEFMC and

NOAA Fisheries. The process is far from perfect, but there is opportunity for stakeholders and the public to review, comment and create dialogue on science, management decisions, and other decisions that directly impact the fishing industry. Our concern is that the RPB creates a potential parallel process of developing IEAs. This could open the management of our oceans to an unaccountable and potentially politically-influenced process. There is a reason the Council process typically proceeds at a slow deliberative pace: It is a transparent, science-oriented mechanism with the goal of insulating decision-making from the subjectivity that politics can introduce. An RPB process that entails IEAs is a recipe for poor outcomes.

While commercial fishing support, advocacy and development is an essential focus of the HDC, the HDC also represents other harbor interests, and keeps an eye toward emerging sectors with the potential to contribute to the economic vitality of the New Bedford waterfront. Offshore wind energy development is one such sector. We have therefore positioned ourselves for new developments in that industry. Of special note is the successful completion in 2015 of a state-financed \$100 million marine terminal designed specifically to support the construction, assembly, and deployment of offshore wind turbines from New Bedford harbor.

The overarching aim of the Port of New Bedford is to ensure that a growing and diversifying economic asset moves forward in a way that allows all its many components to thrive. We see value then in proactive efforts to plan for the use of our oceans in a way that not only mitigates potential conflict but creates pathways for all users to succeed.

Thank you for the opportunity to comment on the draft Northeast Ocean Plan. The Port of New Bedford looks forward to working with you and providing whatever information necessary to assist in the development of a thoughtful, responsible ocean planning effort.

Sincerely,



Jon Mitchell
Mayor, City of New Bedford
Chairman, Harbor Development Commission