

North American Marine Environment Protection Association®



2014 Lloyd's List Awards ENVIRONMENT AWARD WINNER

690 Mill Hill Terrace, Southport CT 06890

July 21, 2016

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
55 Great Republic Drive
Gloucester, MA 01930-2276

Mr. Grover Fugate
State Co-Lead, NE Regional Planning Body
Executive Director
Coastal Resources Management Council
Oliver H. Stedman Government Center
4808 Tower Hill Road
Wakefield, RI 02879

Chief Richard Getchell
Tribal Co-Lead, NE Regional Planning Body
All Nations Consulting
P.O. Box 326
Mapleton, ME 0475

RE: Draft Northeast Ocean Plan

Dear Regional Planning Body Co-leads:

The North Atlantic Marine Environmental Protection Association (NAMEPA) is a marine, industry-led non-profit tasked with saving our seas by educating the public and representing the concerns of sustainably-minded marine stakeholders. We work with and share interests with conservationists, aquariums and youth educators around the country, as well as with dredging companies, shipping companies, boating interest groups, the National Oceanic and Atmospheric Administration and the U.S. Coast Guard. In sharing our interests with these organizations, the goal of NAMEPA is to work with our partners and other stakeholders involved in the marine industry to spread awareness of and fight for the need to maintain the health of our oceans in the pursuit of our respective goals. As partner organizations in the marine industry, our mutual goal to "save our seas" demonstrates to clients,

competitors and contemporaries of our respective businesses that we are committed to taking proactive steps towards preserving the oceans we all depend on.

NAMEPA would like to thank the RPB for the opportunity to comment on the draft Northeast Ocean Plan. We believe ocean planning is the most efficient and cost-effective platform for balancing commerce and conservation. It provides stakeholders an opportunity to identify their use of the ocean common grounds, while seeing how other uses might impact their activity. By creating collaborators early in the process instead of the usual conflicts and uncertainty that are so detrimental to business and economic development, we see this plan as a positive move towards healthy use and protection of our invaluable marine resources. Through ocean planning, any potential conflicts can be identified and diffused. The recently-released draft Northeast Ocean Plan brings this tool to federal ocean waters for the first time, and represents an important step towards more sustainable development and conservation of the ocean. **We are pleased to express our support for the draft plan, and urge the RPB to finalize and begin implementing the plan as soon as possible.**

We would also like to offer several recommendations to strengthen the draft plan before it is finalized, and to ensure plan implementation is successful.

Recommendations for strengthening the draft plan:

- NAMEPA believes the marine life and habitat elements of the plan are key to ensuring we can maintain the health of the ocean while also supporting economic activity. In order to be able to take proactive steps towards conserving our ocean resources, the maritime industry needs to accurately understand the ocean resources that may be affected. The enormous quantity of ecological data in the data portal is an excellent tool, and provides a common starting place for discussion. We are also intrigued by the proposal to identify important ecological areas. We believe understanding which areas are particularly important for ocean ecology could help industry more proactively work to conserve those resources. However, the current draft of the plan lacks clarity on how that process will move forward. **We urge the RPB to more clearly define a transparent process for determining important ecological areas.** It should commit to an open, transparent, and scientifically-driven process that allows us to move forward together in support of the framework and identification of important ecological areas.
- One of the strengths of the Northeast Ocean Plan is its commitment to a series of best practices for decision-making. Only through early engagement of stakeholders, agencies and project proponents can we effectively identify and resolve conflicts early on. However, the ultimate effectiveness of these best practices depends on how they are implemented in practice. Industry partners are well positioned to see firsthand how the implementation of the ocean plan is working. However, there does not appear to be a feedback mechanism for stakeholders to provide input to the RPB on plan performance. **We recommend that the RPB consider incorporating a specific commitment or mechanism that allows stakeholders to request the RPB review implementation issues that may arise,** whether it is challenges with implementation of specific commitments in the plan or issues that arise that the RPB did not originally consider. This will provide an important feedback loop and support the RPB's adaptive management goals.

Recommendations to ensure successful plan implementation:

- The long-term stability Northeast Ocean Data Portal is of particular importance to the maritime community. It provides the common platform of data and information that allows us to make smarter, more sustainable decisions. The data it contains on maritime uses is particularly important to the industry, and we urge the RPB to ensure the commitments in the plan to update the data – particularly the U.S. Coast Guard’s commitment to updating the AIS data – are met during implementation. We also urge the RPB to continue to adapt the maritime industry data layers as new information becomes available. Having the most accurate and up-to-date data is critical to the plan’s success, so we are very concerned with ensuring the long-term stability and accuracy of the portal. **We strongly urge the RPB to identify sustainable funding sources and commit to long-term maintenance of the data portal** to ensure future success of the regional ocean plan.
- We applaud the RPB’s commitments to earlier and more effective stakeholder engagement, and urged continued robust outreach to the maritime community as the plan is implemented. Early engagement will help ocean managers better understand the complexities of the maritime industry and help the industry understand how they can contribute to stewarding the marine environment. The information contained in the plan on the trends and future of the maritime industry is extremely helpful, and we urge the RPB to revisit them when updates to the ocean plan occur. We also understand that RPB agencies need to be flexible in their specific approaches to stakeholder outreach and engagement. **We support the broad stakeholder engagement commitments in the plan; however, we urge RPB member agencies to take these stakeholder outreach commitments seriously and outline an action plan for how they will identify and engage stakeholders more effectively during the decision-making process.**
- NAMEPA is also engaged in the Mid-Atlantic Regional Ocean Plan and **our hope is that the Northeast RPB will work with the Mid-Atlantic to ensure harmonization of data and information.** A regional approach to planning is the appropriate scale for this work; however, our members operate at global scales so there must be some consistency between regions for our industry.

Thank you again for the opportunity to provide feedback on the draft Northeast Ocean Plan. The Northeast RPB should be proud of the work it has done, and we look forward to supporting you as the plan moves into the implementation phase. Please do not hesitate to contact us if you would like to discuss our recommendations further, or if we can be of any additional assistance.

Sincerely,



Carleen Lyden-Kluss

Co-Founder and Executive Director
NAMEPA