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Securing a future for fishing communities

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July 19, 2016

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

RE: Draft Northeast Ocean Plan Comments

Dear Mrs. Nicholson;

This letter offers comments on the draft Northeast Ocean Plan (Federal Register Notice 2016-12196) on behalf of Penobscot East Resource Center (PERC) in Stonington, Maine. We appreciate the opportunity to offer comments on the draft plan.

PERC generally supports the efforts of the Northeast Regional Planning Body (RPB), particularly the aspects that drive toward making ocean data more accessible to the public, communities and others, as well as the efforts to improve process and cooperation among federal agencies operating in the Northeast ocean realm. However, we outline below some concerns and observations that we hope will be helpful as you improve the draft and work toward better outcomes for coastal communities across the region.

The importance of commercial fishing to the economy, culture, and future of coastal communities cannot be overstated.

Commercial fishing is represented in the draft alongside numerous other commercial and recreational sectors, but there is little doubt that for many coastal communities, especially for those that are further removed from population centers, fishing is at the core of these communities in ways that go beyond economy, biology, and social considerations. Commercial fishing has the longest history in the region and for many remote communities is currently one of the few dependable economic drivers. The persistence of commercial fishing opportunities must be given the highest level of concern in small, rural communities throughout the region. Simply put, in many small communities without commercial fishing there wouldn't be a community: implying from the beginning of the process that there will need to be tradeoffs with new industries is a non-starter and should not be up for consideration.

Not everything can be captured in a map.

We applaud the efforts of the RPB to capture and share all available data with the public in creative and effective ways. We agree that using this process to identify research needs is entirely appropriate. However, data for some of the region's most important fisheries, like lobster, is lacking. We feel that this could undermine the value of data and lead to misguided thinking among even those with the best of intentions when planning and using available data. Maps are also not especially good at capturing why certain data points, or missing data, are important. Anyone working on the water knows that seasonality, long term trends, and other complicating factors make understanding on-the-water activities much more difficult than referring to a simple map.

Local scale impacts and knowledge must be considered in decision making.

Although we understand the need for regional level planning and appreciate the RPB's acknowledgement that ecosystem based management (EBM) is critical moving forward, we must stress the importance of local knowledge as well as values in decision making and in effective EBM. Community fishermen who depend on local resources are not only the first to recognize and respond to changes in the marine environment around them, but have the greatest direct pressure for stewardship and conservation. Likewise, local community leaders and organizations are in tune with local activities and the values that drive decision making in support or opposition to activities on the water. Although we are certain the RPB knows this is the case, we are not convinced that the plan, as outlined, creates any formal process by which federal, state and commercial activities will need to address local concerns or involve local leaders in decision making and planning. Although there may be region wide objectives or considerations to ocean planning efforts, if the process does not ultimately accommodate local concerns and values the RPB's efforts around EBM will have been a failure and few of the benefits to such a process will be recognized.

Cooperation with state and local government as well as community entities is fundamental to successful outreach and understanding regional and local complexity.

This comment expands on our previous point and further emphasizes that the RPB should outline in its "best practices" or processes in the Plan, an emphasis on engaging state agencies, local government and community entities, including non-profits, trade groups, and others. Simply put, although planning may be needed at a regional scale, it is impossible for the data the RPB has made available or regional document to outline all the complexities that occur locally. Connecting with those on the ground in coastal communities can help the complexities of a given project or action to be better understood. For example, the RPB has done great work in making available data around certain fisheries, but in some ways this data can be misleading without caveats and perspectives of those who are fishing, work with fishing communities, or regulate at the finer scale. By alerting users and planners to other sources of information or formalizing a process to reach contacts who can do so, some missteps will surely be prevented. By indicating more clearly in the plan (and revising as needed) a process for connecting with these local experts and considering their knowledge the RPB will be taking an important step toward accomplishing their goals.

We hope that the RPB finds these comments helpful in finalizing a draft plan and formalizing a process for integrating local values and knowledge into the process. Thank you for the opportunity to comment.



Kyle Molton
Policy Director