

July 20th 2016

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Chief Richard Getchell
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RE: Comment on Draft Northeast Ocean Plan

Dear Regional Planning Body Co-leads:

As the owner/operator of a recreational charter fishing business in Point Judith Rhode Island, I clearly recognize the importance of understanding current ocean uses, as well as planning for future potential ocean uses. The State of Rhode Island, through the RI OSAMP, has set a standard for stakeholder engagement that clearly results in a better planning process and less conflict among stakeholders. As the President of the RI Party and Charter Boat Association, I represented this sector throughout our states planning process as well as engaging in the Northeast Ocean Planning process and fully support this endeavor. I applaud the work of the Northeast Regional Planning Body and look forward to working with them on future iterations of the ocean plan.

The Northeast Ocean Data Portal and associated data is, in my opinion, a valuable step forward in the way we manage the ocean. I see the portal as the key component to the ocean plan. Given the portal's importance to agencies when trying to understand where appropriate development should occur that doesn't interfere with the party and charter boat industry, this data must be maintained and advanced. I urge the RPB to devote the necessary funds to ensure future improvements and long-term utilization of the data portal.

Traditionally, the charter and party boat industry has lacked good data on where we use the ocean. I am happy to see the RPB begin to address this large data gap in our industry. My role in developing a successful RPB sponsored party and charter boat pilot spatial characterization project proved to me industry and agencies can collaborate to fill important data gaps; therefore, it is my belief that this type of model should be extended to more of the charter and party boat sector to further improve and refine

data on our industry. While identifying this as a science and research priority in Chapter Five is a first step, I urge the RPB to fund research to ensure this important data gap is filled. I look forward to working with the RPB during plan implementation to further advance the party and charter boat industry data.

Specifically, for the fishing community, the RPB must develop better data on pelagic fish and invertebrate species especially for those species found in the water column and not effectively captured with benthic trawl surveys. The RPB must also work to develop data on the party and charter boat sector, as I mentioned above, but also consider the recreational, lobster, and crab fisheries.

Through conversations with the fishing community, there seems to be a lack of clarity over the important ecological areas. (IEA's) I believe there are a variety of data sets and approaches used to identify and manage areas in the ocean important for ecology and habitat and spawning, including the New England Fisheries Science Center's essential fish habitat(EFH) research and the New England Fishery Management Council's management work within its Habitat Plan and amendments. The NEFMC Plan identifies and describes EFH for the 18 species managed by the Council, major threats to EFH from both fishing and non-fishing related activities, and proposed conservation and enhancement measures and designated Habitat Areas of Particular Concern for Atlantic salmon and Atlantic cod¹. Nearly completed amendment 2 to the plan builds on this work through an established and open public process. The confusion with the framework for identifying important ecological areas lies in how these data sets and approaches are similar or different from data and ongoing work that currently exists as part of the Council process. I urge the RPB to clearly articulate how these will add or differ to ongoing work. I can appreciate the value in this framework approach but would like a clearly defined, transparent, and scientifically developed process to continue that gives all stakeholders, including fishermen, a level of comfort that we can all move forward together in support of a new framework and identification for these important ecological areas.

Overall, I strongly ask the RPB to seek to improve interactions with recreational and commercial fishermen. I appreciate the actions identified and outlined that seek to improve coordination and outreach to fishermen and I urge the RPB to hold firm on these commitments. Fishermen rarely, if ever, have time to constantly monitor projects that could affect them offshore (particularly during the important early planning stages); however, having actions from RPB agencies, like BOEM, in place that creates early outreach and engagement before permits applications are finalized will be highly beneficial to both fishermen and project developers. This early engagement with fishermen will ensure reductions in conflicts and benefit all parties involved.

Lastly, as part of the commitment to ensure stakeholder engagement continues, there should be some mechanism that allows stakeholders to provide input on the ocean plan during implementation. This mechanism could take on many forms but should allow fishermen and other ocean users the ability to request the RPB to address certain management issues. This type of feedback could be part of the plan's monitoring and evaluation component and will allow for improvements to future plan iterations.

I congratulate the RPB on the progress it has made. I look forward to working with this body as they continue to improve charter and party boat engagement and data. Please feel free to contact me with additional questions.

¹ <http://www.nefmc.org/management-plans/habitat>

Sincerely,

Capt. Rick Bellavance, President
RI Party and Charter Boat Association

Owner/Operator Priority Fishing Charters
Point Judith, Rhode Island