



Center for Coastal Conservation



National Marine
Manufacturers Association

July 25, 2016

Ms. 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.

Dear Ms. Nicholson:

Thank you for the opportunity to comment on the draft Northeast Regional Ocean Plan. As leading national organizations representing the recreational fishing and boating community, we commend the Northeast Regional Planning Body for undertaking this challenging task and producing a thorough report based on considerable state, federal and public involvement.

According to NOAA Fisheries, the 1.4 million saltwater recreational fishermen in New England have a \$2.2 billion economic impact and support over 23,000 jobs. Recreational fishing and boating are tremendously important to the New England economy and culture.

From the initial roll out of the National Ocean Policy, our community has expressed concerns with the potential impacts it might have on recreational fishing opportunities. Through existing state and federal laws, the U.S. has demonstrated itself to be a world leader in fisheries management. While challenges still persist in some fisheries, the positive trend of rebuilding fisheries and ending overfishing shows that the existing U.S. fisheries management system is fully capable of ensuring fisheries sustainability. We therefore have held concerns that the National Ocean Policy might infringe on fisheries management, either directly or indirectly, especially by promoting concepts that might close important areas to fishing through means other than the existing fisheries management system.

Thankfully, the Northeast Regional Planning Body has taken a pragmatic approach toward achieving the goals of the National Ocean Policy. The regional plan recognizes existing authorities and focuses on improving agency coordination and sharing data in ways that should

facilitate smarter planning, reduce user conflicts and conserve ocean resources. We support actions described in the plan to improve consideration of the recreational fishing community's interests in various agency actions, such as potential offshore energy development projects. However, we do wish to note that under Action CF-4, "*Identify potentially affected commercial fishing stakeholders,*" that recreational fishing stakeholders should be included as well.

One aspect of the plan that is concerning to us is "*Identifying Important Ecological Areas (IEAs).*" We fear that without establishing clear goals and purpose for IEAs, once areas are identified, federal agencies will be compelled to "do something" from a regulatory standpoint. Specifically, we are concerned that the identification of IEAs could ultimately lead to the creation of fishing closures in these areas, regardless of whether such a closure is warranted based on sound fisheries management. Unfortunately, there are numerous examples from across the country where closures to important marine areas have been proposed despite a lack of fisheries management basis. We fear that IEAs could help facilitate additional unjustified closures.

However, we recognize and appreciate the stepwise approach that the Northeast Regional Planning Body has taken to explore IEAs through the continued development of the IEA Framework. As compared with the draft Mid-Atlantic Regional Ocean Plan, which unfortunately commits to identifying specific "Ecologically Rich Areas" in the short term without any stated purpose, the Northeast Regional Ocean Plan lays out a more exploratory path. We look forward to working with the Northeast Regional Planning Body to ensure that the IEA concept is further developed thoughtfully, with clear objectives in mind, before specific areas are identified.

We again commend the Northeast Regional Planning Body for producing a regional plan that sets forward processes for improving coordination among agencies and stakeholders in a way that can improve management of coastal and ocean resources. We encourage you to continue down the collaborative and thoughtful approach you have taken so far as the plan moves forward.

Sincerely,

Mike Nussman, President and CEO
American Sportfishing Association

Jeff Angers, President
Center for Coastal Conservation

Patrick Murray, President
Coastal Conservation Association

Jeff Crane, President
Congressional Sportsmen's Foundation

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Thom Dammrich, President
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Ellen Peel, President
The Billfish Foundation