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*Submitted electronically*

Dear Northeast and Mid-Atlantic Regional Planning Body Co-Leads:

Thank you and the other Northeast and Mid-Atlantic Regional Planning Body (Northeast and Mid-Atlantic RPB) representatives for your leadership in drafting the nation's first regional ocean plans to help protect ecosystem health and promote sustainable use. We value your efforts over the past several years to draft plans that outline steps state and federal agencies, fisheries managers, and tribes are willing to take to improve our often uncoordinated ocean decision-making structures. These groundbreaking plans advance ecosystem-based management (EBM), an integrated approach endorsed by the nation's leading scientists which "considers the entire ecosystem [in order to] ... maintain [it] in a healthy, productive and resilient condition so that it can provide the services humans want and need."<sup>1</sup> We urge you to build beyond the information sharing and use coordination aspects inherent in such a holistic concept to fully embrace EBM's key requirement to "emphasiz[e] the protection of ecosystem structure, functioning, and key processes" in the final plans.<sup>2</sup>

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<sup>1</sup> McLeod, K.L., J. Lubchenco, S.R. Palumbi, and A.A. Rosenberg. 2005. *Scientific Consensus Statement on Marine Ecosystem-Based Management*, available at [http://www.compassonline.org/science/EBM\\_CMSP/EBMconsensus](http://www.compassonline.org/science/EBM_CMSP/EBMconsensus).

<sup>2</sup> *Ibid.*

As a result of your collaboration with the Northeast Regional Ocean Council and Mid-Atlantic Regional Council on the Ocean to develop marine life and use data portals, the draft plans and the future of the RPBs are rooted in a commitment to use best available science. There is significant value in the species-level models that have been created to assist the planning processes and in the synthetic data products that are being developed to identify areas of ecological richness and importance. These data and associated maps, such as those that portray distribution and abundance of ecologically and biologically grouped species and the multi-taxa core abundance areas where more than 50 percent of a region's fish, birds, marine mammals, and corals can be found over the course of a year, improve our shared understanding of the natural system's connections and functioning, and will help inform cumulative impacts analyses and establish a baseline by which we can evaluate changes brought about from a rapidly changing climate.

We urge you not to stop here, however, and to commit to identify and conserve all important ecological areas (IEAs, in the Northeast)/ ecologically rich areas and region-wide ecological features (ERAs, in the Mid-Atlantic), defined as "habitat areas and species, guilds, or communities critical to ecosystem function, recovery and resilience."<sup>3</sup> Ensuring that the work is completed to identify special ocean places would advance both plans' shared goal of a healthy ocean ecosystem and we request that you include short, definitive deadlines for completion of this synthesis work. Many of us have participated in expert forums, such as the Ecosystem-Based Management Work Group, to clarify what makes a place ecologically important, and also to identify where key decisions may be necessary to ensure the equitable maintenance of and access to ocean ecosystem services. We believe that there is sufficient information to identify a full suite of Northeast and Mid-Atlantic IEAs/ERAs using available data now.<sup>4</sup> We stress the importance of and strongly recommend identification of these areas and the inclusion of associated maps and other information on the portals by the close of 2016. The draft plans acknowledge the ongoing need to administer and update the portals with new information. Because EBM must be adaptive, the promise of better data in the future should not prevent the creation and use of tools like IEAs/ERAs in the present to guide decision-making at all levels of government and for stakeholders.

Additionally, each federal and state agency should commit to using the IEA/ERAs and the core abundance areas to inform and guide their decision-making processes. Agencies should identify management measures they can take, under their existing authorities, to protect these areas from uses that are incompatible with their primary function of ensuring broader ecosystem health. There is extensive documentation of various resource/ use conflicts within existing scientific literature that can serve to inform agencies as to what stressors could be mitigated in order to ensure a healthy ecosystem.

We appreciate your efforts to enable EBM through the measures recommended above and with proposals in the draft plans to develop ecosystem health monitoring and evaluation programs. We

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<sup>3</sup> The draft *Northeast Ocean Plan* at 53, available at: <http://neooceanplanning.org/wp-content/uploads/2016/05/Draft-Northeast-Ocean-Plan-Full.pdf>.

<sup>4</sup> Appendix 3 of the draft *Northeast Ocean Plan* identifies five components of ecological importance: areas of high productivity; areas of high biodiversity; areas of high species abundance; areas of vulnerable marine resources; and areas of rare marine resources. Currently, the Northeast RPB has only committed to "illustrating" one or two of the five components by the end of 2017, pending future data collection efforts and adequate funds. (See, for example, the *Northeast Ocean Plan* at 55).

encourage you to reach out to us and other scientists and subject matter experts to provide further feedback on issues requiring scientific advice and thank you for your efforts to help protect our ocean resources for this and future generations.

Sincerely,

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