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RE: Comment on Draft Northeast Ocean Plan

Dear Co-leads for the Northeast RPB:

As a former commercial fisherman, a charter boat owner, a participant in fishery management, and fishing community-organizer, I applaud the good work done and the quality of the draft Northeast Ocean Plan (Plan). Having followed this planning process from inception, it is remarkable to see what the RPB has accomplished in a relatively short timeframe with little precedent to follow. Overall, the Plan offers a solid foundation for marine planning yet to come, and critical guidance for agencies. The potential benefits of the Plan for fishing communities, to thrive in the face of economic and environmental change, cannot be overstated.

With adoption of the Plan it will be essential that participating agencies follow through on and expand upon their commitments, by reprioritizing budgets and dedicating personnel to build

upon what this Plan has initiated. What is more, it is imperative that Congress provide additional budgetary support for implementation of this Plan and iterations of Regional Ocean Planning to follow.

### **Specific Comments on the Plan Provisions on Fisheries**

Having previously served on the New England Fishery Management Council and other NOAA advisory bodies, I have a manager's familiarity with the quality, depth and complexity of data-sets supporting commercial and recreational fisheries of the Northeast Region. For the first time these data are being made accessible to the public through the Northeast Ocean Data Portal, in a comprehensible and easy-to-navigate presentation, with analyses. Several innovations are worth noting:

- Until this planning process, vessel monitoring system data (VMS) which is generated within NOAA enforcement branch, was only available to fishery managers through special request. The Regional Ocean Planning process has recognized the extraordinary value of VMS, creating the context for VMS information to be presented in a format which does not compromise its proprietary nature. These powerful data are now available to the fishing public and decision-makers in general.
- Until this planning process the spatial distribution of recreational fishing activities was poorly understood, having never been adequately characterized; the public, planners and agencies now have a comprehensive map recreational fisheries diversity and distribution on which to build.
- Fishery data suffers from wide variations in quality; this variation is rooted in regulatory complexity and variation in data collection requirements on various fleet segments; this variation in data quality is now well characterized for planners and agencies to take into account.
- Similarly, data gaps, such as spatial mapping of the lobster fishery, are recognized and become priorities in management.

Existing coastal and ocean uses and industries are growing in volume and intensity, along with emergence of new industries such as offshore aquaculture and renewable energy. The combined effect has the potential to compete with fisheries, both on the water and on the waterfront, and precipitate impacts which are not initially obvious. Because fisheries are so complex and poorly understood outside the agencies responsible for fishery management, NEPA consultation process has often proven inadequate to incorporate important fishery considerations in regulatory actions. The Interagency Coordination provisions detailed in Chapter 4 of the Plan, including regulatory agencies stated actions for implementation, combined with the now ready availability of fishery data, will elevate general understanding of impacts on fisheries from development and regulatory action, and how these impacts may be most effectively mitigated. These new "best practices" promise to better engage the fishing-public in solution-building, earlier and more often. The Northeast Ocean Plan will have the effect of illuminating the special character of fisheries and identify issues important to preserving their vitality; some examples:

- Fisheries are spatial in nature with areas of higher and lower productivity; the spatial character of fisheries is predictable to some degree but demonstrates a great deal of variation over time.
- Similarly, the social and economic structure of recreational and commercial fisheries is closely tied to fishermen's ability to adapt to natural variation in fish availability;

regulatory actions outside of fisheries which are static and place-based, have the power to disrupt fishing effort.

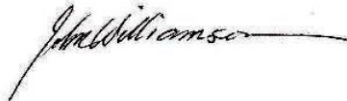
- Fisheries happen at multiple scales; cumulative impacts analysis under NEPA needs to consider local, regional and coast wide effects.
- Because of the characteristics of water as a suspension medium, planning in the ocean environment requires more adaptive strategies than planning in the terrestrial environment.
- That there is a strong link between healthy ocean wild-capture fisheries and policies for near-coastal and estuarine habitat management and development.

### **Recommendation for Future Planning**

The Northeast Ocean Plan is a terrific work-in-progress. The work is only just begun. To illustrate the potential for planning, and spark the interest of ocean users in furthering this planning effort under the next administration, the Plan should include a section which identifies policy questions as examples of what might follow from this initial effort. Public hearings have demonstrated that stakeholders are anticipating policy questions; rather than down-play the difficulty of addressing policy making, the Plan should acknowledge and describe a process to address policy issues which may arise, consistent with standards of transparency, fairness and balanced public engagement.

Thank you for the opportunity to provide these comments on the draft Northeast Ocean Plan. We look forward to approval of the Final Plan and implementation.

Best regards,

A handwritten signature in black ink, appearing to read "John Williamson", with a long horizontal flourish extending to the right.

John Williamson  
FV Sea Keeper Charters  
Sea Keeper Fishery Consulting