

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 Betsy:

I provided extended comments at the public session in Gloucester, MA on June 13, 2016. For the record, I would like to reiterate those themes.

I want to express great appreciation for the hard work of the RPB members and staff and for the release of a well-articulated and useful Draft Northeast Ocean Plan. I believe I attended all but one of the many RPB meetings and special workshops over the last four years and offered comments at each of these meetings. From this perspective, I see the Draft Plan as a significant and appropriate step forward for ocean management in New England.

First, I believe the Draft Plan appropriately establishes a healthy ocean and coastal ecosystems as the first and highest goal of the Plan. It establishes the principle of management for the public good and seeks to protect and sustainably advance both the natural and the human environment. In that context, the Plan describes an intertwined and interdependent ecosystem and seeks to further ecosystem-based management. And, the Plan promotes “an adaptive approach” to managing the ocean ecosystem.

Second, it is important to me and my colleagues in Gloucester, in particular, that the Draft Plan does not recommend radical decisionmaking frameworks that were considered at various points in the last few years. The first of these, “tradeoff analysis”, would have established a framework for “maximizing profits” (the objective of the current literature) in particular zones of the ocean and would have opened the door for a set of choices based on monetary factors alone. In the process, doors would have been opened wide for extensive extractive activities in the ocean that would not reflect the values and preferences of the American people for protection of the ocean, a healthy wild food supply, and strong coastal communities and traditions.

Further, while the Plan does describe ongoing work to increase knowledge of “Important Ecological Areas”, it does not in any way endorse a specific strategy of National Monument designations. These would preempt the years-long efforts of the National Marine Fisheries Service to protect appropriate areas, such as spawning habitats, etc. There is minimal evidence that setting aside particular “wilderness” areas in the ocean is an effective priority for a healthy ocean or for a sustainable management of an ecosystem that is in constant flux. The initial focus on offshore waters only has also been replaced by a better coastal watershed-ocean approach.

Third, the emphasis on the data portal and the goal of maximizing data collection and enhanced understanding of the ocean ecosystem are worthy priorities.

Fourth, robust stakeholder engagement in all subsequent implementation efforts should be assured, including any subsequent RPB meetings, EBM working group meetings, research workshops, and discussions around sand and gravel and aquaculture, in particular. I support the suggestions of the Conservation Law Foundation, NEOAN, and others in this regard. I believe that public, stakeholder engagement in the development of the Plan was a key element in its success and I urge strong public engagement going forward as well. I agree with NEOAN members that an additional public meeting in the fall, prior to the final submission of the Plan, would be advisable. And, the ad hoc federal-state meetings around sand and gravel and marine aquaculture should be opened to the public, as well. Too many of these meetings have been closed to the public.

Fifth, I recommend that the strong policy and values framework of the Plan (healthy ocean as the highest priority, ecosystem-based and adaptive management) be incorporated by relevant agencies as they develop guidelines for permitting of new activities, such as aquaculture. While it is important for agencies, as the Plan suggests, to incorporate the latest and best data available and to seek better coordination with other agencies, it is also essential that agencies make decisions that reflect the public good, as broadly defined in the Plan. And, agencies should seek to provide explicit incentives for project proposals that are restorative and innovative. For example, the Plan mentions the high potential for polytrophic aquaculture, that both provides food, but also improves water quality and habitat. Permit applicants should be encouraged to explore leading and pilot projects, in this regard. As I mentioned in my public comments in Gloucester, the

Massachusetts Ocean Plan asserts that regulatory decisions should reflect the overall vision, principles and objectives of the Plan. Perhaps this could be a model for the federal Plan, as well.

Sixth, while there is substantial overlap in the approach taken in the draft Plans for New England and for the Mid-Atlantic, there are several differences in the overall framing. While New England establishes three goals of a healthy ocean, effective decisionmaking, and compatibility among uses, the Mid-Atlantic Plan describes the two goals of healthy ocean ecosystem and sustainable ocean uses. New England's goals are a bit more bureaucratic and pragmatic, while the Mid-Atlantic's are more holistic. And, the Mid-Atlantic objectives for a healthy ocean ecosystem are noteworthy: discovering, understanding, protecting, and restoring the ocean ecosystem; accounting for ocean ecosystem changes and increased risk; and valuing traditional knowledge. At an early public hearing in Gloucester, residents pointed out that traditional knowledge is not just Native American, it is also fishing industry and coastal community knowledge.

Greater emphasis in the New England Draft Plan to both the objectives of ocean ecosystem restoration and use of traditional knowledge would be advisable and would reflect public comments made repeatedly. In particular, the workshop on Ecosystem-Based Management that was held in New Hampshire emphasized the importance of thinking holistically and "thinking like the ocean" (both Native American and biomimicry-based), including listening to ocean systems dynamics, restoration opportunities, and harvesting methods that heal the ocean, while also providing sustenance and materials of use to humans.

Finally, an editorial note is that it is important to present fair and balanced data in the summaries of the Plan. As I noted in the Gloucester meeting, a chart shows \$1.2 Billion in commercial fishing landings revenue in 2012, while also showing \$18.6 Billion in GDP created by tourism and recreation in 2013. This is an apples to orange comparison. In the Draft Plan, fishing activity is shown as generating \$13 Billion on page 84, while recreational activities contribute only \$10 Billion, on page 94. It is important that the public is provided with unbiased data. Gloucester residents have pointed this out repeatedly to ocean planners. Fishing revenue typically includes landings, while the recreational economy revenue includes even the cost of gasoline for driving to the beach!

Thank you for the opportunity to comment on the Draft Ocean Plan and I look forward to additional implementation activities, and in particular to opportunities for the public and stakeholders to partner with federal and state agencies going forward.

Sincerely,

A handwritten signature in black ink, reading "Valerie I. Nelson". The signature is written in a cursive style with a long horizontal flourish at the end.

Valerie I. Nelson, PhD  
Water Alliance  
Citizen of Gloucester, Massachusetts