

The Maine and New Hampshire Port Safety Forum applauds the efforts of the Northeast Regional Ocean Council on the development of this comprehensive document. Further, the Port Safety Forum appreciates the opportunity to comment on this innovative approach to ocean planning. The overall process and realm of the plan and accompanying portal is a positive move toward more collaborative ocean spatial decision making.

General Comments:

Rather than a detailed plan, it seems that it is more of a “frame-work” for responsible agencies to follow when building specific plans or strategies related to coastal or ocean development. The plan appears to be very broad and without any detailed planning specifics.

Portal:

The portal features are very helpful in ascertaining baseline data. It would be prudent to identify the sources of data captured in the portal.

To this end, it may also help some portal users to better understand whether the information is automated/electronically gathered (such as AIS) vs. human collected (such as fish landings).

Page 66 – Marine Transportation General Environmental/Social Comment:

The plan explains some of the logistics and economic components of the regional shipping picture in New England, however, there is no conversation on the inherent environmental benefits of moving cargo by sea. While it is fairly well known within the marine industry, external parties may not be aware that often marine transport is the most sustainable form of moving cargo. Broadly speaking, ships are typically over 6 times more fuel efficient per ton-mile than truck and over twice as efficient as rail. These fuel savings equate directly to lower air emissions per ton-mile. Moreover, other safety regulations including double hull and operational standards has made seaborne petroleum transport safer than it ever has been previously. Additionally, ballast water and air pollution regulations are removing even more of the environmental risk from the shipping sector. Beyond being the green choice, marine transportation is also a better social choice, as it reduces land based road and rail congestion which directly impacts road and infrastructure maintenance. According to a 2013 report of the Research and Traffic Group, the bulk capacity of one ship could eliminate over 960 trucks and 300 rail cars from over-used land based roads and rails. Shipping also lessens border crossing delays and reduces noise, vibration, and visual impacts associated with heavy truck and train traffic. The inherent environmental and social benefits of marine transportation would be appropriate to incorporate into the Ocean Plan to help readers best understand the whole picture of shipping.

Page 66 – Marine Transportation:

The introductory paragraph understates the economic impact of marine transportation. While more data is provided in the following paragraphs, the initial paragraph, suggests that the economic impact only provides jobs to those directly involved in the movement

of marine cargo (vessel operators, pilots, etc.). The economic impact of marine shipping extends to businesses and families far beyond the local transportation network. Economically speaking, marine transportation can lower transportation costs on a ton/mile basis and increase market access for businesses thereby broadening economic impact even further. Additionally, goods and energy are distributed through a complex network of transportation lines which begin and end (domestically) with the shipping component. Oil that is shipped from Venezuela may eventually be consumed in middle America, frozen fish landed on the East Coast could be consumed in California, etc. Ultimately, the end users of marine transportation may be families and industry that are located in land-locked states which suggests a far broader reach than local maritime employees. The language describing the \$5.4 Billion and 37,000 jobs as regional economic contribution should be better highlighted.

Page 67 and 73 – Marine Transportation (USCG Regulatory and Management Responsibilities):

One voluntary tool that could be leveraged was not mentioned under the Coast Guard heading on page 67, which is a Ports and Waterways Safety Assessment. The Coast Guard, when requested, may facilitate a Ports and Waterways Safety Assessment which ascertains the navigational safety of very specific waterways through a risk assessment. This may be another tool in the Coast Guard’s tool box which may be leveraged in the planning process.

The Coast Guard’s Navigation Center describes the risk assessment process as “*a disciplined approach to identify major waterway safety hazards, estimate risk levels, evaluate potential mitigation measures, and set the stage for implementation of selected measures to reduce risk. The process involves convening a select group of waterway users / stakeholders and conducting a two-day structured workshop to meet these objectives. A sponsor (e.g., Captain of the Port) is required to initiate and manage the workshop. However, the process must be a joint effort involving waterway users, stakeholders, and the agencies / entities responsible for implementing selected risk mitigation measures.*”

The risk assessment process represents a significant part of joint public-private sector planning for mitigating risk in waterways. The Coast Guard’s Office of Navigation Systems (CG-NAV-3), may be contacted for more information at 202-372-1526.

Page 70 - Marine Transportation Statistics:

The Portal’s Vessel Traffic data maps currently do not show specific vessel numbers regarding vessel port calls. The current “heat map” image is extremely useful and should be kept but deeper analysis that may be needed when considering local projects will benefit from knowing specific numbers of vessel transits (by vessel type). This may be appropriate to upgrade the Marine Transportation Actions (MT-2) to include enhancement of the Portal to include port specific numbers of transits. Further, it would be beneficial to better understand accurate cargo, ferry, and cruise ship volumes in Northeast ports to study trends and forecast changes in traffic volumes and shipping needs as they relate to eco-based planning. The U.S. Army Corps of Engineers

conducts a very broad analysis each year entitled Waterborne Commerce of the United States which may be a useful foundation.

Page 52 and Appendix 3 – Marine Habitat:

There is discussion of Important Ecological Areas both in Chapter 3 and later detailed in Appendix 3. It is unclear what thresholds are required to justify or label a resource as ecologically important or what agency or qualified entity would make the determination. Further, it is unclear what the determination may mean to other waterway users and stakeholders.