

March 28, 2012

Ms. Nancy Sutley, Dr. John Holdren, and Members National Ocean Council c/o Council on Environmental Quality 722 Jackson Place, NW Washington, DC 20503

Dears Chair Sutley and Chair Holdren:

On behalf of the New England Ocean Action Network (NEOAN) we offer the following comments on the draft implementation plan for the National Ocean Policy. NEOAN is a multi-stakeholder network comprised of individuals and organizations from New England's educational and research institutions, fishing industry, environmental community, clean energy field and other ocean users, industries and stakeholders. NEOAN supports the development of a comprehensive ocean plan for New England as a means to sustainably grow our region's ocean economy while protecting the health of the ocean ecosystems upon which our quality of life, businesses and communities depend.

We thank the National Ocean Council for their work to develop the draft implementation plan for the National Ocean Policy. New England's coast and ocean are among our region's greatest economic, environmental and cultural assets. Stewarding the natural environment and improving the management of our coast and ocean through a regional ocean planning process (technically known as Coastal and Marine Spatial Planning) will help to grow our region's coastal and maritime economy, restore and protect ocean and coastal ecosystems, and recognize and acknowledge New England's unique maritime heritage. Therefore, we urge the Council to move with all deliberate haste to form a regional planning body (RPB) to undertake regional ocean planning in New England and that the regional planning body in New England be established and operating before the end of 2012.

As you move forward to implement the draft plan for comprehensive ocean planning through the development of a Handbook for Regional Coastal and Marine Spatial Planning (action 1) we further urge you to maintain a focus on developing a planning process that is open, transparent and rooted in both sound science and meaningful participation of the individuals and organizations whose livelihoods and quality of life are deeply connected to the ongoing health of the ocean. Specifically, we urge the development of formal mechanisms for robust stakeholder and public participation in the regional planning process. These mechanisms should include the establishment of an advisory body or bodies to the RPB to facilitate the involvement of stakeholder groups as well as public meetings, forums and comment periods that will allow the general public to understand and participate in the planning process. Taking specific actions to ensure an open planning process will ensure that diverse ocean users

and public stakeholders have a full opportunity for offering technical expertise, scientific data, and local knowledge into the decision-making process of the regional planning body and will result in both a better plan for our oceans and broader public support for that plan.

Specifically, NEOAN urges you to develop a planning process that:

- is developed through an open and transparent process that includes participation of New England's ocean and coastal users and coastal communities;
- uses the best available scientific, economic, and cultural data; legal information; and local knowledge;
- acknowledges and recognizes the economic and cultural importance of the commercial and recreational fishing industries, as well as other historical ocean users;
- supports the sustainable development of both our ocean resources and our local and regional economies;
- seeks to minimize the impacts of human-induced climate change and ocean acidification; maintains adequate federal funding for ocean planning efforts;
- fosters cooperation between federal, tribal, state and local agencies and governments;
- protects, restores and maintains clean coastal waters and healthy ocean and coastal ecosystems for the benefit of human communities and marine wildlife; and
- educates ocean users, the public, regional decision makers and stakeholders about the need and value of a comprehensive regional ocean plan and planning process.

Thank you for the opportunity to comment on the draft plan. We look forward to working with the National Ocean Council and the New England regional planning body to create a plan that will ensure the continued prosperity of New England's coastal economies and communities as well as the rich and diverse ocean ecosystems upon which they depend.

Sincerely,

Winston Vaughan
Community Outreach Associate, Conservation Law Foundation
Coordinator, NEOAN

Ben Martens Executive Director, Maine Fishermen's Association

John K. Bullard President, Sea Education Association

Nicholas Battista Marine Programs Director, Island Institute

Capt. Rick Bellavance
President, RI Party and Charter Boat Association

Richard Nelson

Captain F/V Pescadero, Lobsterman from Friendship, Maine

Sally McGee

Northeast Marine Program Director, The Nature Conservancy

Megan Amsler

Executive Director, Cape & Islands Self-Reliance Corp.

Sarah Schumann

Oceans Working Group Coordinator, Sierra Club Rhode Island Chapter

Jack Clarke

Director of Public Policy & Government Relations, Mass Audubon

Rob Moir, Ph.D.,

Executive Director, the Ocean River Institute

Eugenia Marks

Senior Director of Policy, Audubon Society of Rhode Island

Jonathan F. Stone

Executive Director, Save The Bay

Susan Little Olcott

Stakeholder Manager, Coastal and Marine Spatial Planning, Ocean Conservancy

Dan Pingaro

CEO, Sailors for the Sea