

From: **MidAtlanticRPB, BOEM** <boemmidatlanticrpb@boem.gov>
Date: Tue, Jul 15, 2014 at 12:49 PM
Subject: Re: National Ocean Policy Coalition comment letter on the Mid-Atlantic Regional Planning Body's stakeholder engagement strategy draft outline
To: Jack Belcher <JBelcher@hbwresources.com>
Cc: "MidAtlanticRPB@boem.gov" <MidAtlanticRPB@boem.gov>, Brent Greenfield <BGreenfield@hbwresources.com>

Thank you for submitting comments on the Draft Mid-Atlantic Regional Ocean Planning Stakeholder Engagement Outline. The MidA RPB will consider all comments received, and will post them on the website. The MidA RPB will develop its Stakeholder Engagement Strategy, and in the process anticipates making a draft available for public review and comment in the coming months. Please continue to check the website (<http://www.boem.gov/Mid-Atlantic-Regional-Planning-Body/>) for additional information.

On Tue, Jul 15, 2014 at 11:48 AM, Jack Belcher <JBelcher@hbwresources.com> wrote:
To whom it may concern:

Attached please find a National Ocean Policy Coalition comment letter on the Mid-Atlantic Regional Planning Body's stakeholder engagement strategy draft outline.

Please contact me at (713) 337-8818 or jbelcher@oceanpolicy.com if you have any questions.

Sincerely,
Jack

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July 15, 2014

Ms. Maureen Bornholdt
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Submitted Electronically via MidAtlanticRPB@boem.gov

Dear Ms. Bornholdt, Ms. Schultz, and Mr. Smith:

The National Ocean Policy Coalition (“Coalition”) is pleased to submit comments on the Mid-Atlantic Regional Ocean Planning Stakeholder Engagement Strategy Draft Outline (“draft outline”). The Coalition is an organization of diverse interests representing sectors and entities that support tens of millions of jobs, contribute trillions of dollars to the U.S. economy, and seek to ensure that actions under the National Ocean Policy are implemented in a manner that best benefits the National interest, including protection of the commercial and recreational value of the oceans, marine-related natural resources, and terrestrial lands of the United States.

Introduction

Mid-Atlantic RPB stakeholder engagement efforts must be sufficient to secure the buy-in, support, and consensus of the region’s commercial and recreational stakeholders. Given the significant regulatory, economic, and societal implications (please see the Coalition’s comment letter dated April 15, 2014 that describes the Federal implementation mandates) involved with the regional ocean planning process, RPB activities should be subject to stakeholder processes and standards at least as rigorous as those accorded to statutorily-authorized ocean use planning and regulatory processes. A clear, transparent, and inclusive process would decrease the likelihood of poorly-informed actions that unnecessarily constrain commercial or recreational activity or lead to unintended consequences for a range of interests in the Mid-Atlantic.

In seeking to outline a proposed process for moving forward with the development of a stakeholder engagement strategy in the Mid-Atlantic, the draft outline rightly acknowledges that “[t]here has not yet been a systematic, thorough assessment of stakeholders that the MidA RPB needs to engage with, the key issues to discuss, or a comprehensive approach to engaging them. ”The Coalition finds this troubling, as it and others have made repeated requests for the RPB to immediately work to establish a formal role for commercial and recreational user groups (including through direct RPB participation and, at minimum, through the establishment of a formal advisory committee under the Federal Advisory Committee Act as authorized under Section 8 of the National Ocean Policy Executive Order). While the Coalition has sought to be equal partners with the RPB, the RPB has regrettably decided to proceed by utilizing a Stakeholder Liaison Committee that would provide guidance and feedback to a third party, which in turn would report back to the RPB.

As the Coalition has previously noted, using a third party to serve as a conduit between a liaison committee and the RPB does not serve to meet the needs for inclusiveness of a diverse stakeholder group. Such an approach puts additional bureaucratic distance between the RPB and its stakeholders, which goes counter to directives for effective stakeholder involvement. For any engagement mechanisms that are employed, it is essential that they are carried out by the RPB in a transparent, clear, and efficient manner and that user groups and the public have direct information about and access to RPB activities, including through opportunities to participate as equal partners with RPBs in the development and review of proposed engagement methods.

In the case of the Stakeholder Liaison Committee, the group was established without opportunity for review and comment as to the proposed selection process and any membership criteria under consideration, and its inaugural meeting was unannounced and closed to the public. The Coalition finds this course of action to be inconsistent with sound practices for effective stakeholder involvement.

As stated in the Coalition’s public comments at the Mid-Atlantic Regional Planning Body’s May 2014 meeting in Baltimore, the establishment and full implementation of a stakeholder engagement strategy and sufficient, formal, and transparent engagement mechanisms should be in place, and informed by stakeholder input, before the further proposal, adoption, or completion of RPB decisions and milestones.

While some key Mid-Atlantic ocean planning products have already been adopted, proceeding in such a manner going forward is necessary in part to effectively meet the draft outline’s call for “enhanc[ing] stakeholder understanding, guidance, and validation of key products being developed for the Mid-Atlantic ocean planning process.” The Coalition continues to uphold its request for halting further RPB actions until appropriate and direct RPB-stakeholder mechanisms are in place.

Proposed Stakeholder Engagement Process

The draft outline proposes a stakeholder engagement process that includes the following steps: (1) identification of goals and objectives; (2) stakeholder identification and analysis; (3) determinations on the level of engagement for stakeholder groups; (4) identification of specific stakeholder engagement activities/strategies and key messages; (5) identification of entities/resources available for stakeholder engagement; (6) risk consideration; (7) development of an engagement plan covering the entities and

activities/strategies available for stakeholder engagement; (8) implementation of specific activities/strategies; and (9) plan evaluation and possible adjustments.

This sequence of events, as described, raises serious questions about the manner in which stakeholders will be regarded and represented either by or to the RPB. The Coalition finds it unclear who will be carrying out these time- and labor-intensive steps, what information they will consider, and what criteria they will use to sort and make decisions about stakeholders. For example, Step 1 on goals of engagement should have been set by EO and RPB foundational documents, not left up to the discretion of a SLC or other small group. Steps 2 and 3 are critical and highly consequential activities, and there should be no question that the RPB itself must be accountable for enabling high engagement levels of the broadest stakeholder population.

In short, the Coalition is concerned that stakeholders will be shortchanged if a small group of people, unknown and unaccountable, is able to exercise significant discretion and subjectivity about which stakeholders to engage, what their stake is, what is an appropriate form and “desirable” (see Step 4) level of engagement, and considering the “risks” (Step 6) associated with specific stakeholder activities. Collectively, these steps will likely serve only to create additional distance, uncertainty, and confusion about the RPB’s intent in dealing with stakeholders. In contrast, stakeholders must have confidence in the stakeholder process.

Moreover and not insignificantly, the time required to effectively implement the proposed 9-step stakeholder engagement process further underscores the importance of conditioning further RPB decision-making on completion of the strategy. Otherwise, significant RPB activities will continue to occur without the input and guidance that would result from a comprehensive and well-informed stakeholder engagement effort.

To ensure the well-informed and transparent identification and analysis of stakeholders, determination of engagement levels for various groups, and identification of specific engagement activities/strategies, the RPB should commit to release a draft version of the engagement plan called for in proposed Step 7 to provide an opportunity for public review and comment.

The need for public review of a draft engagement plan is underscored by the proposed use of the “Stakeholder Analysis Template,” which categorizes stakeholders according to their levels of stake/interest and resources, influence, and power in order to “suggest[] the level of engagement appropriate.” Like the above sequence of steps, this tool also invites a great deal of subjectivity, and it is unclear how it would be effectively used in practice.

If, however, the RPB still chooses to proceed with such a framework as to proposed use of the chart on “Spectrum of Stakeholder and Public Involvement and Influence in CMSP,” the RPB should specifically list commercial and recreational groups in the “Parties Involved” box for the “Explore/Inform,” “Consult,” “Decide,” and “Implement” phases. Mid-Atlantic RPB states generated over \$3.3 trillion in economic output in 2013, and significant economic contributors may not otherwise be represented by the parties listed in the draft outline.

Finally, the draft engagement plan should clearly note any instances where engagement efforts are either not proposed or are proposed in a more limited manner based on resource availability justifications. This is essential for acknowledging the inherent limits of a resource- and information-constrained planning effort.

Proposed Goal

Proposed Goal: To provide Mid-Atlantic stakeholders with meaningful opportunities for engagement with the RPB and input throughout the regional ocean planning process in the Mid-Atlantic.

Consistent with the Coalition’s previous comments and in order to ensure effective and transparent stakeholder engagement that accounts for existing and foreseeable and potential future activities, the proposed goal should be revised to read as follows:

To widely and transparently communicate meaningful and formal opportunities for existing and potential future Mid-Atlantic stakeholders to engage with the RPB and provide input throughout the regional ocean planning process in the Mid-Atlantic as equal partners in the development of processes, products, and engagement mechanisms.

Proposed Objectives

Proposed Objective 1: To identify, assess, and engage key stakeholders in regional ocean planning in the Mid-Atlantic (See Table 1 for assessment approaches), including:

- Inform and seek input on how to engage stakeholders throughout the MidA RPB process; and
- Help MidA RPB members and stakeholders understand the opportunities and tools for engagement and avail themselves of these opportunities.

Obtaining input on how to engage stakeholders and raising stakeholder awareness about opportunities and tools for engagement are important objectives. However, as previously discussed, recent developments regarding Mid-Atlantic stakeholder engagement raise concerns as to the extent to which such objectives will be implemented in practice.

To address the importance of stakeholder input in guiding Mid-Atlantic regional ocean planning activities, proposed objective 1 should be revised to read as follows:

To identify, assess, and engage key stakeholders to inform and guide regional ocean planning in the Mid Atlantic including:

- *Inform, seek, and incorporate stakeholder input on engagement mechanisms to be used throughout the MidA RPB process; and*
- *Help MidA RPB members and stakeholders understand all available and potential opportunities and tools for engagement and avail themselves of these opportunities.*

In addition, as stated above, the proposed use of the “Stakeholder Analysis Template” -- which categorizes stakeholders according to subjective and unclear metrics or quantifications for identifying or measuring their levels of stake/interest and resources, influence, and power in order to inform levels of appropriate and desirable engagement – underscores the need for an opportunity to review and comment on a draft engagement plan to ensure a transparent process that allows stakeholders to understand how the RPB characterizes and prioritizes their input in the planning process.

Proposed Objective 2: To strengthen mutual and shared understanding about relevant problems and opportunities for the Mid-Atlantic Ocean, including:

- Inform and equip MidA RPB members with the messages and tools to effectively communicate with stakeholders;
- Inform stakeholders about ocean planning activities, timelines, and the MidA RPB's role;
- Ensure that MidA RPB members receive comments and provide effective feedback to stakeholders on the comments they submitted; and
- To the extent possible, incorporate stakeholders' comments into documents/actions.

To ensure that stakeholder engagement activities provide opportunities for true partnership-building and collaboration and to adequately account for the importance of stakeholder perspectives, proposed objective 2 should be revised to read as follows:

To strengthen mutual and shared understanding and effective two-way communications about relevant problems and opportunities for the Mid-Atlantic Ocean, including:

- *Inform and equip MidA RPB members with the messages and tools to effectively communicate with stakeholders;*
- *Inform stakeholders about ocean planning activities, timelines, and the MidA RPB's role;*
- *Ensure that MidA RPB members engage in active and ongoing dialogue with stakeholders, obtain formal stakeholder guidance and advice, and receive and provide effective feedback to stakeholder comments; and*
- *Ensure that RPB documents/actions reflect the consensus of the Mid-Atlantic stakeholder community.*

Proposed Objective 3: To build the knowledge, skills, and understanding of regional ocean planning.

Proposed Objective 4: To capitalize on previous related efforts (e.g. state ocean planning activities).

In addition to the proposed objectives to further increased stakeholder understanding of regional ocean planning and account for past efforts, the strategy should clearly state the following critical objective:

(Requested) Proposed Objective 5: *To ensure that commercial and recreational interests that have made and could make significant contributions to the Mid-Atlantic region's economic, employment, and societal health are provided with sufficient opportunities to engage the MidA RPB and help guide its actions.*

Proposed Outcomes

Short-term for all stakeholders:

- Improve shared understanding of issues, process, perspectives, etc.
- Identify and understand common concerns (i.e., those shared by multiple stakeholders)
- Identify information needs
- Build relationships and trust

Mid-term for key stakeholder groups:

- Obtain comments on draft planning products
- Solicit suggestions for approaches/solutions
- Address priority concerns, issues, and topics as identified by the MidA RPB and its stakeholders in a transparent and trusted way
- Discuss planning options
- Form a community of ocean planners and stakeholders

Long-term for some stakeholder groups:

- Consensus-based agreements among the RPB, informed by meaningful engagement and input from stakeholders

Individual uses and activities do not occur in a vacuum, as ocean planning decisions with regard to one use or a limited set of uses will invariably impact other existing and potential activities. Therefore, it is essential that commercial and recreational interests are adequately accounted for in short-term, mid-term, and long-term outcomes.

Dividing up stakeholders into “all,” “key,” and “some” increases the risk that important contributors to the region’s economy will be excluded from engagement opportunities and underscores the need for further clarification of this proposed structure, as well an opportunity for review and comment on a draft engagement plan that addresses the identification of stakeholders and engagement mechanisms proposed to be employed.

In addition, the proposed long-term outcome should be revised to read as follows:

Long-term for Mid-Atlantic stakeholders:

- Consensus-based agreements among the RPB, informed by meaningful engagement and input from all concerned stakeholders, that fully reflect the region’s economic, recreational, and societal interests

Conclusion

A comprehensive, transparent, and effective stakeholder engagement strategy that enables user groups to participate as equal partners in the RPB’s ocean planning effort is vital to ensuring an outcome that does not adversely impact the region’s economic, recreational, and societal interests.

Considering the expansive reach of RPB outcomes that could affect – and limit – the actions of any stakeholder linked to the ocean economy, the Coalition takes this process very seriously. If the Mid-Atlantic RPB intends to produce plans, as directed by EO and NOP foundational documents, that would determine all future Federal actions – including regulations, policies, and plans – in and on the oceans and affecting ocean resources and uses, then it is incumbent on this RPB to establish a clear, consistent, and robust stakeholder role comparable to that established by other statutorily-authorized public engagement processes. The RPB cannot achieve its goals by selecting only some uses and excluding others (considering the interdependencies in a systems-wide approach), and subjectively determining what stakeholder activities are appropriate and desirable.

Therefore, in addition to implementing formal mechanisms for user group engagement, including the establishment of a formal advisory committee under the Federal Advisory Committee Act, the Coalition respectfully requests that the RPB revise the draft outline as outlined above in order to reflect the importance of a well-informed, transparent, and collaborative engagement effort.

To ensure comprehensive, transparent, and effective engagement, the RPB should also commit to release the revised draft engagement plan for public review and comment and condition further decision-making on the establishment and implementation of the stakeholder engagement strategy and sufficient, formal, and transparent engagement mechanisms.

The Coalition appreciates the opportunity to inform the RPB's development of a stakeholder engagement strategy and looks forward to continued dialogue to help secure a successful outcome.

Sincerely,

A handwritten signature in black ink that reads "Brent D. Greenfield". The signature is written in a cursive, slightly slanted style.

Brent D. Greenfield
Executive Director
National Ocean Policy Coalition
Sincerely,

From: **MidAtlanticRPB, BOEM** <boemmidatlanticrpb@boem.gov>
Date: Wed, Jul 16, 2014 at 7:34 AM
Subject: Re: Mid-Atlantic RPB Stakeholder Engagement Strategy Comment Letter
To: Sarah Winter <Sarah@littoralsociety.org>
Cc: "MidAtlanticRPB@boem.gov" <MidAtlanticRPB@boem.gov>, "Alison chase (achase@nrdc.org)" <achase@nrdc.org>

Thank you for submitting comments on the Draft Mid-Atlantic Regional Ocean Planning Stakeholder Engagement Outline. The MidA RPB will consider all comments received, and will post them on the website. The MidA RPB will develop its Stakeholder Engagement Strategy, and in the process anticipates making a draft available for public review and comment in the coming months. Please continue to check the website (<http://www.boem.gov/Mid-Atlantic-Regional-Planning-Body/>) for additional information.

On Tue, Jul 15, 2014 at 6:37 PM, Sarah Winter <Sarah@littoralsociety.org> wrote:
Please find attached a letter from several stakeholders regarding the Mid-Atlantic RPB's draft stakeholder engagement strategy. Thank you for providing this opportunity for us to provide our thoughts and recommendations on stakeholder engagement for his region. This strategy is an important first step and we look forward to our continued engagement around engaging stakeholders in this important work.

Best Regards,
Sarah Winter Whelan

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American Littoral Society • Anacostia Watershed Society • Citizens Campaign for the Environment • Maryland Academy of Sciences at The Maryland Science Center • Maryland Coastal Bays Program • Miami2Maine • National Aquarium • Natural Resources Defense Council Ocean Conservancy • Surfrider Foundation • Wildlife Conservation Society

July 15, 2014

Mid-Atlantic Regional Planning Body Co-Leads:

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Annapolis, Maryland 21401

Submitted electronically

Re: Mid-Atlantic Regional Ocean Planning Stakeholder Engagement Strategy Draft Outline

Dear Ms. Bornholdt, Ms. Schultz, and Ms. Leonard:

On behalf of our organizations listed above, we thank you and the other Mid-Atlantic Regional Planning Body (MidA RPB or RPB) representatives for your efforts to engage stakeholders and the public in your critical work to develop a Regional Ocean Action Plan (Plan) to help protect our Mid-Atlantic ocean and encourage its sustainable use. We strongly agree with the *Mid-Atlantic Regional Ocean Planning Framework* (Framework) that “Partnerships with stakeholders are critical to the success of this planning effort” and appreciate the work that has been invested in developing this *Mid-Atlantic Regional Ocean Planning Stakeholder Engagement Strategy Draft Outline* (Strategy) to help advance the Framework’s principle of engagement to “seek meaningful stakeholder and public input in the regional planning process using multi-faceted tools to encourage public participation and understand expressed needs.”¹

We value the RPB’s stated efforts to build on its recent outreach efforts and those of organizations like the Mid-Atlantic Regional Council on the Ocean (MARCO) to bring a greater cross-section of the public

¹ Framework at 2 and 6. Available at <http://www.boem.gov/Mid-Atlantic-Regional-Ocean-Planning-Framework/>. Strategy available at <http://www.boem.gov/Mid-Atlantic-Regional-Ocean-Planning-Stakeholder-Engagement-Strategy-Draft-Outline/>.

into Plan discussions so that the RPB can “achieve ... purposeful, two-way, continuous stakeholder engagement.”² We offer the below recommendations to you regarding this essential work.

I. The RPB should incorporate stakeholder engagement strategies and actions directly into the Workplan and finalize this document in 2014.

Our organizations support the proposed Strategy goal: “To provide Mid-Atlantic stakeholders with meaningful opportunities for engagement with the RPB and input throughout the regional ocean planning process in the Mid-Atlantic” and, to this end, encourage you to adopt an accelerated timeline to advance the Strategy.³ We recommend undertaking Steps 1-3 to identify stakeholders, their roles in this process and opportunities for involvement (*e.g.*, providing additional details on uses, review of a draft Plan) this summer and hosting a forum or webinar in early fall to report back on preliminary findings.⁴ The ideal goal would be to incorporate feedback from the public comment period and the forum/webinar into the RPB’s draft Workplan, which we hope to review a draft of in advance of the fall RPB public meeting, before it is finalized.

Conducting the stakeholder analysis piece now, in concert with drafting a full outreach strategy, would enable the RPB to fold stakeholder outreach deliverables directly into the Workplan and to spell out clearly “specific activities or strategies that could be used for stakeholder groups to achieve the desired level of engagement” (Step 4).⁵ Furthermore, this work on stakeholder identification would help the RPB reach out to more individuals before the fall meeting, which intends to address the important question of the Plan’s “nature and purpose ... what additional information and actions are needed to develop it.”⁶

We believe the RPB would benefit by organizing the stakeholder outreach largely by work products. Integrating outreach strategies in the Workplan and timeline, both through identifying specific outreach goals tied to existing deliverables (*e.g.*, science community feedback on the Regional Ocean Assessment and public hearings on a draft Plan), and by including a stakeholder outreach component itself (Step 7) as a primary deliverable, would keep the RPB accountable for prioritizing involvement at each major milestone.⁷ Establishing a parallel stakeholder engagement plan document would only unnecessarily replicate much of the Workplan and, given the RPB’s workload, may result in this piece taking a backseat to current efforts.

It should be noted that is not necessary for all stakeholder identification work to occur upfront; new audiences will present themselves throughout the work. All outreach efforts should include a step tailored to evaluate the effectiveness of the specific action(s) (Step 9) (*e.g.*, through quantifying public turnout,

² Strategy at 1. Available at <http://www.boem.gov/Mid-Atlantic-Regional-Ocean-Planning-Stakeholder-Engagement-Strategy-Draft-Outline/>.

³ *Ibid.*, at 4.

⁴ *Ibid.*, at 4.

⁵ *Ibid.*, at 4.

⁶ *Process Recommendations for Mid-Atlantic RPB Consideration*, available at <http://www.boem.gov/MidA-RPB-May-20-21-2014-Meeting-Materials/>.

⁷ Strategy at 4. Available at <http://www.boem.gov/Mid-Atlantic-Regional-Ocean-Planning-Stakeholder-Engagement-Strategy-Draft-Outline/>.

addition of new interested parties to the work) and identify improvements that can be undertaken in future stages.⁸

It is important that regional planning “ensure frequent and *transparent* broad-based, inclusive engagement of partners, the public, and stakeholders,” and allow for “numerous opportunities for a broad range of input to gain a better understanding of the human uses and influences on the planning area, and expectations, interests, and requirements for the future.”⁹ Listing ocean planning activities, deadlines, and opportunities for engagement (*e.g.*, the listening sessions that were held on the Framework) will allow for a more transparent process where stakeholders understand where their feedback is most valuable and how their input will be used to advise the Plan. The Workplan should also expressly describe the relationship between MARCO’s Stakeholder Liaison Committee,¹⁰ which we view as an important tool to foster greater stakeholder awareness of and engagement in the RPB’s work, and the additional necessary outreach efforts the RPB will undertake, and list deliverables accordingly.

II. The RPB should reestablish its Stakeholder Workgroup.

We recommend that the RPB reestablish its Stakeholder Workgroup as a special team to help jumpstart the strategic efforts identified above and coordinate communications and outreach activities. We agree that each RPB member is responsible for stakeholder engagement¹¹ and appreciate the Strategy’s call for agencies to individually pursue strategies to get the word out to their constituents,¹² but suggest having a select team focused on assisting with stakeholder outreach would help ensure message consistency and achievement of deliverables. It would also offer the public contacts for ideas for increased distribution.

Further, we recommend that the RPB task this workgroup with reorganizing the RPB website presence. Our groups appreciate the prompt posting of materials, but as the work has grown the RPB’s website has become confusing to navigate. With public engagement only expected to grow, we recommend improved organization of the many useful materials hosted here and the incorporation of a calendar with upcoming deliverables and opportunities noted.¹³

III. Each RPB member should commit their agency to engaging their communication and media office in assisting in dissemination of RPB materials.

The RPB member entities have a wealth of resources at their disposal in their own communications and/or media offices that should be brought in to assist in engaging stakeholders. The reconstituted Stakeholder

⁸ Strategy at 4. Available at <http://www.boem.gov/Mid-Atlantic-Regional-Ocean-Planning-Stakeholder-Engagement-Strategy-Draft-Outline/>.

⁹ *Final Recommendations of the Interagency Ocean Policy Task Force* at 48 and 47, available at http://www.whitehouse.gov/files/documents/OPTF_FinalRecs.pdf. Emphasis added.

¹⁰ See, for example, information on the Stakeholder Liaison Committee at <http://midatlanticocean.org/march-2014-slc-meeting/>.

¹¹ See Strategy at 2, “The Stakeholder Workgroup was disbanded when each RPB member was assigned responsibility to engage with stakeholders.” Available at <http://www.boem.gov/Mid-Atlantic-Regional-Ocean-Planning-Stakeholder-Engagement-Strategy-Draft-Outline/>.

¹² The Strategy gives as examples “NOAA agrees to host a meeting with commercial fishing interests, U.S. Coast Guard agrees to have a session at an upcoming navigation meeting, etc.” at 2. Available at <http://www.boem.gov/Mid-Atlantic-Regional-Ocean-Planning-Stakeholder-Engagement-Strategy-Draft-Outline/>.

¹³ It may be useful to follow the setup of websites like www.neoceanplanning.org and www.pacificislandsrpb.org.

Workgroup should include at least one (if not more) communication specialist within an RPB member entity who can advise the RPB on engagement strategies and help to coordinate outreach efforts.

In addition, every participating RPB entity has vast network of existing public contacts that should be brought into this work. Simply tapping into existing agency stakeholder listservs (beyond the MARCO and RPB databases) would allow for a much broader dissemination of the information and enable recipients to learn about this work and choose whether or not to engage further. For example, the Bureau of Ocean Energy Management regularly corresponds with stakeholders regarding offshore wind developments; it is likely that a substantial subset of this listserv would be interested in learning more about regional ocean planning activities regarding wind. As this regional planning work interacts with numerous uses, it could be raised in every agency's upcoming meetings, webinars, etc.

IV. To review and advise the MidA RPB's products, the RPB should develop a science engagement strategy.

We strongly recommend establishing a science advisory panel comprised of academics and subject-matter experts to provide feedback on the ongoing Regional Ocean Assessment and other work products.¹⁴ The *Final Recommendations of the Interagency Ocean Policy Task Force* notes as one of the essential elements for regional ocean planning:

Consult Scientists and Technical and Other Experts: The regional planning body would consult scientists, technical experts, and those with traditional knowledge of or expertise in coastal and marine sciences and other relevant disciplines throughout the process to ensure that [regional ocean planning] is based on sound science and the best available information. To this end, the regional planning body would establish regional scientific participation and consultation mechanisms to ensure that the regional planning body obtains relevant information.¹⁵

The Framework as well states a need to “Consult scientists, technical, and other experts in conducting regional ocean planning and developing ocean planning products.”¹⁶ This science advisory panel does not need to be established by the Federal Advisory Committee Act (FACA) process in order to offer the RPB benefits; even without producing consensus advice, opinions or recommendations, we believe that such a body would prove useful.

We recommend holding a webinar for the science community in the coming months and identifying components of the RPB's work where they might be able to assist. One possibility is presenting the Northeast Regional Planning Body's (Northeast RPB) *Draft summary of marine life data sources and approaches to define ecologically important areas and measure ocean health*, a document recently developed for this sister RPB's June 25 natural resources workshop and which could be used as a jumping off point to discussions of additional data sources available in the Mid-Atlantic that are not captured by the report.¹⁷

¹⁴ See, for example, the letters several of our organizations submitted to the MidA RPB on September 4, 2013, November 4, 2013, February 12, 2014, and July 23, 2014.

¹⁵ Final Recommendations at 56. Available at http://www.whitehouse.gov/files/documents/OPTF_FinalRecs.pdf.

¹⁶ Framework at 2. Available at <http://www.boem.gov/Mid-Atlantic-Regional-Ocean-Planning-Framework/>.

¹⁷ Available at http://neoceanplanning.org/wp-content/uploads/2014/06/Marine-Life-Assessment-Inventory_draft-for-workshop.pdf.

The Northeast RPB will similarly need to reach out to a technical team of academic and scientific experts; there will be a significant degree of overlap in terms of the two region's science advisors. It may be wise to explore the possibility of combining forces to engage science advisors in determining, at the very least, the preferred method of identifying important ecological areas within the Regional Ocean Assessment work.

Conclusion

The National Ocean Council's *Marine Planning Handbook* states "engagement and substantive participation of stakeholders and the public" is a "cornerstone of marine planning"; the work outlined in the Strategy begins to weave together existing and future efforts to present the necessary comprehensive stakeholder approach.¹⁸ We look forward to working with you to develop the Strategy to encourage robust involvement in development of a final Plan to guide the region's ocean protection and sustainable use.

Sincerely,

Ali Chase
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Matt Gove
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Surfrider Foundation

Sarah Winter Whelan
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¹⁸ *Marine Planning Handbook* at 5. Available at http://www.whitehouse.gov/sites/default/files/final_marine_planning_handbook.pdf.

Eric Schwaab
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