

From: **MidAtlanticRPB, BOEM** <boemmidatlanticrpb@boem.gov>
Date: Fri, Jan 19, 2018 at 2:44 PM
Subject: Re: Comments on the Mid-Atlantic Regional Planning Body January 24 Meeting Materials
To: "Chase, Ali" <achase@nrdc.org>
Cc: "McKay, Laura (DEQ)" <Laura.McKay@deq.virginia.gov>, "darlene.finch@noaa.gov" <darlene.finch@noaa.gov>, "KelseyLeonard@shinnecock.org" <KelseyLeonard@shinnecock.org>, "MidAtlanticRPB@boem.gov" <MidAtlanticRPB@boem.gov>

Thank you for the letter from several organizations regarding the materials for the January 24 MidA RPB meeting. We appreciate your recommendations.

We will share your letter with the members of the MidA RPB for consideration as we continue our work. We will also post your letter to the written public comments section on the MidA RPB webpage. Please continue to contact us with any additional comments you may have.

Please check the RPB website for updated information (<https://www.boem.gov/MidA-New/>) and plan to participate in the next in-person public MidA RPB meeting on Jan. 24 in Philadelphia, PA. For updates about the status of the January 24, 2018 meeting, please also see the MARCO website: <http://midatlanticocean.org/>.

On Thu, Jan 18, 2018 at 4:19 PM, Chase, Ali <achase@nrdc.org> wrote:

Attached please find a letter from several organizations regarding the materials for the January 24th Mid-Atlantic Regional Planning Body meeting. Please feel free to contact me with any questions at 212.727.4551.

Sincerely,

Ali Chase

ALISON CHASE
*Senior Policy Analyst, Oceans
Nature Program*

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Think before printing.

**American Littoral Society • National Aquarium • Natural Resources Defense Council •
Surfrider Foundation • Virginia Aquarium and Marine Science Center •
Wild Oceans • Wildlife Conservation Society**

January 18, 2017

Ms. Darlene Finch
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Submitted electronically via MidAtlanticRPB@boem.gov

Re: Comments on the Mid-Atlantic Regional Planning Body January 24th Meeting Materials

Dear Ms. Finch, Ms. Leonard, and Ms. McKay,

On behalf of our organizations and their millions of members and activists, thank you and the other Mid-Atlantic Regional Planning Body (MidA RPB or RPB) members for hosting the upcoming January 24th public meeting. We appreciate the time and effort your agencies spent to develop the *2017 Draft Semi-Annual Work Plan and Progress Report* (Progress Report) and look forward to discussing many of the completed and proposed milestones with you at the event.¹ We also greatly appreciate that the January 24th agenda clearly calls out the meeting's decision points and that the recommendation papers were posted in advance.² Based on these materials, below please find our recommendations to the RPB regarding *Mid-Atlantic Regional Ocean Action Plan* (Plan) Healthy Ocean Ecosystem Action 1 to "[i]dentify ecologically rich areas of the ocean in the Mid-Atlantic region and increase understanding of those areas to foster more informed decision making" and Action 5 to "[d]evelop, monitor, and assess indicators of the health of the Mid-Atlantic regional ocean ecosystem."³

¹ Progress Report dated December 2017 *available at* <https://www.boem.gov/Semi-Annual-Work-Plan-and-Progress-Report/>.

² Links to all meeting materials are *available at* <https://www.boem.gov/MidA-RPB-Public-Meeting-January-24-2018/>.

³ See, Plan at 40 and 44, *available at* <https://www.boem.gov/Ocean-Action-Plan/>.

I. Adopt the Ecologically Rich Areas Work Group’s recommendations and further clarify the RPB intends to achieve Healthy Ocean Ecosystem Action 1.

Our organizations find the RPB’s efforts to identify a suite of Ecologically Rich Areas (ERAs)⁴ to be one of, if not *the*, most important contributions to achieving the first of the Plan’s two stated goals to “promote ocean ecosystem health, functionality, and integrity through conservation, protection, enhancement, and restoration.”⁵ Knowing which areas keep our ocean system functioning provides all of us – state and federal managers, businesses and other stakeholders – a guide to places that warrant particularly careful consideration in siting decisions to ensure continued health of the ecosystem and of the regional coastal communities and economies which depend on our ocean’s well-being.⁶ We are pleased to see the Ecologically Rich Areas Work Group’s (ERA Work Group) commitments⁷ to:

- Post ERA component categories, alongside the identified datasets necessary to best understand each component, on the Mid-Atlantic Ocean Data Portal (Portal);
- Develop user-friendly communication tools explaining each ERA component and addressing questions that may arise regarding the listed datasets;

⁴ ERAs are special ocean places which contribute significantly to overall ecosystem health by hosting a high diversity and/or abundance of wildlife or that are especially unique or sensitive. Different places may be special for different reasons – as noted in the RPB’s *Synthesis Options Paper*, “An ERA could contain one or more of five different components: productivity, abundance, biodiversity, rarity and vulnerability. Understanding where these areas are and how they change seasonally and over longer periods of time is expected to result in better-informed management decisions.” See, *Synthesis Options Paper at 1*, available at <https://www.boem.gov/ERA-Component-Synthesis-Options/>. Also, *Final Framework for the Identification of Ecologically Rich Areas*, available at <https://www.boem.gov/Final-Framework-for-Identifying-ERAs/>. These categories are based on extensive dialogue with this region and the Northeast’s science community, public comment on the *Draft Framework for Identification of Ecologically Rich Areas*, and a series of stakeholder workshops. Additional information on the Northeast Regional Planning Body’s Ecosystem-Based Management Work Group is available at <https://neoceanplanning.org/>.

⁵ Plan at 26, 38-9, available at <https://www.boem.gov/Ocean-Action-Plan/>. The Plan’s Healthy Ocean Ecosystem actions are intended to address: “*Objective 1 – Discovering, understanding, protecting, and restoring the ocean ecosystem* Enhance understanding of ecosystem functionality and the key roles of Mid-Atlantic ocean habitats and physical, geological, chemical, and biological ocean resources through improved scientific understanding and assessments of naturally occurring processes and changes and the effects of ocean uses. Foster collaboration and coordination for protection and restoration of ocean and coastal habitats that are important for improving ecosystem functioning and maintaining biodiversity. *Objective 2 – Accounting for ocean ecosystem changes and increased risks* Facilitate enhanced understanding of current and anticipated ocean ecosystem changes in the Mid-Atlantic. These include ocean-related risks and vulnerabilities associated with ocean warming (including sea level rise and coastal flooding/ inundation), ocean acidification (including effects on living marine resources), and changes in ocean wildlife migration and habitat use. *Objective 3 – Valuing Traditional Knowledge* Pursue greater understanding and acknowledgment of Traditional Knowledge, along with other cultural resources and values, and incorporate such knowledge and values in the ocean planning process.” See, Plan at 39.

⁶ Please see the November 29, 2017 comment letter from many of our groups which outlines detailed recommendations for the ERA effort’s next steps.

⁷ *Work Group Recommendations for Next Steps on Ecologically Rich Areas (ERA)*, posted December 14, 2017, available at <https://www.boem.gov/ERA-Work-Group-Recommendation-on-Next-Steps/>.

- Allow datasets under each ERA component to be classified and overlaid, which allows for simpler illustrations of areas with high values, while retaining the individual components as base layers for transparency and review;
- Develop tools like slider bars that present a range of quantifiable choices to aid visualization of synthesized data layers;⁸
- Advance further data synthesis products that will aid in conveying broad ecological patterns (e.g., a map of core abundance for avian, fish, and marine mammals); and,
- Provide opportunities for further scientist and stakeholder input throughout 2018.

We stress the need for the RPB to continue synthesis of ERA component datasets, bundling together map layers within components to better understand and communicate the presence of key ecological areas. Such synthesis products can inform agency decision-making on a wide variety of issues, from shipping to offshore wind siting, by showing further details as to the presence of marine wildlife and providing a shared basis for more educated and engaged stakeholder discussions regarding how development could proceed in a manner responsive to marine life and citizens who depend on its health for jobs, food, and recreation. Further synthesis is needed in order to identify a suite of ecologically rich areas and we appreciate the ERA Work Group’s dedicated efforts to ensure Healthy Ocean Ecosystem Action 1 is attained.

II. Develop a plan to incorporate ERA component data on the Portal no later than April 2018.

We are concerned that the timeline presented for the above ERA work calls for a “Plan for Integrating ERA component data and accompanying data caveats, gaps, and limitations into [the] portal” by June, and that the next RPB meeting is proposed for May.⁹ As the RPB likely will need to express formal approval of the Work Group’s draft plan before proceeding, we urge that development of the integration plan be completed no later than the end of April to allow for its review and adoption at the RPB’s May meeting.

III. Adopt the Steering Committee’s recommended next steps to advance ocean health indicators.

Our organizations fully support RPB efforts to achieve the Plan’s Healthy Ocean Ecosystem Action 5. We support the Steering Committee’s recommendations to transition into a formal RPB Work Group that develops an ocean ecosystem monitoring and assessment web-based dashboard tool hosted on the Portal for use by the public, as well as the RPB. We approve of the Steering Committee’s assessment that the dashboard embrace simplicity, linking to more complex and/ or technical websites when needed, and that the tool present data in a neutral manner which visualizes and explains ecosystem

⁸ We strongly recommend that peer reviewed science be used to provide *recommended* statistical cutoffs.

⁹ Progress Report at 4-5, available at <https://www.boem.gov/Semi-Annual-Work-Plan-and-Progress-Report/>.

changes and trends. We similarly approve of the framework themes – Living Ocean, Ocean Conditions, and Human Footprint – and many of the sample indicators nested under these categories.¹⁰

IV. Select ocean health indicators which reflect changes in the health of the natural system.

We remain concerned about inclusion of an “ocean uses and socioeconomics” issue under the Human Footprint theme and look forward to participating in further discussions to explore this. Healthy Ocean Ecosystem Action 5 is designed to help achieve the Plan’s previously stated ecosystem health goal and its objectives. As such, we believe that the project should avoid adding data categories which do not tell us something about the health of the natural ecosystem. This does not mean anthropogenic pressures should not be reflected on the dashboard, rather that the screen for their inclusion as an issue or indicator reflects an impact on the health of the natural system. For example, identifying an indicator to track trends in underwater noise levels relates to marine mammal health, as underwater noise pollution results in increased challenges for ocean wildlife to mate, find food, and migrate. However, the topic of the ocean economy is linked more to supply/ demand curves than ocean health. While collection of socioeconomic measures would help aid understanding of ocean value, this work more closely aligns with the RPB’s second goal to: “Plan and provide for existing and emerging ocean uses in a sustainable manner that minimizes conflict, improves effectiveness and regulatory predictability, and supports economic growth.”¹¹ We recommend that the RPB consider running a parallel process which explores economic factors, and keeps the issues and subsequent indicators for Action 5 within the bounds of expressing meaningful information regarding the ocean’s natural health.¹²

V. Continue to update the Progress Report and develop a discussion draft of Performance Monitoring and Evaluation Plan Tracker options by June 2018.

We appreciate the Progress Report’s semi-annual updates and are pleased to see the December 2017 draft include efforts to advance the Plan’s best practices for enhanced coordination and science and research needs.¹³ Folding the best practices into Plan actions through the document is a change we hope will be retained with future report updates. Inclusion of a master timeline upfront in the document made it easier to see how the Plan’s various actions are moving ahead overall and we hope it will similarly be retained.

¹⁰ *Steering Committee Recommendation for Next Steps on Indicators*, posted December 14, 2017, available at <https://www.boem.gov/Indicator-Steering-Committee-Recommendation/>.

¹¹ *Plan at 45*, available at <https://www.boem.gov/Ocean-Action-Plan/>.

¹² Some questions have been raised over the course of this effort as to what defines a healthy ocean. Several of our groups previously provided a definition of ocean health for comments on the RPB’s Framework which would serve for this project. We suggested: “A healthy marine ecosystem is one that is able to support and maintain patterns, important processes, and productive, sustainable and resilient communities of organisms, having a species composition, diversity and functional organization resulting from the natural habitat of the region, such that it is capable of supporting a variety of activities and providing a complete range of ecological benefits. Scientific literature has established four ecological principles for maintaining or restoring healthy, resilient ecosystems: 1) native species diversity, 2) habitat diversity and heterogeneity, 3) populations of key species, and 4) connectivity. (See, for example, ‘Guiding ecological principles for marine spatial planning’ at <http://micheli.stanford.edu/pdf/18-Foleyetal2010MarPol.pdf>.)”

¹³ *Plan at 31-7 and 92-3*, available at <https://www.boem.gov/Ocean-Action-Plan/>.

We encourage the RPB to add an action step during this Progress Report’s timeframe that fleshes out “approaches for evaluating [Plan] performance or documenting effectiveness.”¹⁴ One option to consider would allow the Performance Monitoring and Evaluation Plan Tracker (Tracker) to serve as an easily accessible chart of Plan implementation, including for each Plan section and action measurable outcomes (e.g., development of updated agency guidance could serve as an indicator metric), compelling stories (which could be reported or linked to success stories from the Work Plan), and a link to Work Plan details, rather than a reiteration of the particular Work Group’s progress.¹⁵ As the RPB completes Plan actions, the Work Plan could be updated with a new link to a write up of the Work Group’s measurable achievements and learning as well as providing prior Work Plan details so as not to lose an understanding of the work details and how they evolved. Our organizations also recommend having the Tracker incorporate measures to evaluate public involvement and satisfaction.¹⁶

VI. Discuss development of an early stakeholder notification approach.

We continue to recommend the RPB host a discussion at an upcoming meeting regarding the beginnings of an early stakeholder notification approach which would help stakeholders be more engaged upfront in the vetting and design of various projects, when feedback is most valuable and when developers have more flexibility.¹⁷ We suggest forming a RPB working group with relevant stakeholders representing industry, non-consumptive recreation, and the conservation communities to develop a sample proposal. Such a proposal might include hosting a RPB discussion of when in agencies’ processes Portal data is factored in so that stakeholders are aware of how their industry’s data is being used to shape proposals.

The RPB could also prove to be a useful forum for open and transparent discussion of newly emerging uses like finfish aquaculture and for informational agency policy updates, particularly when stakeholder concerns between uses exist. We see value in having a specific online mechanism for stakeholders to formally request that the RPB consider hosting educational forums on a wide range of intersecting offshore uses to allow the public to better understand offshore development with all relevant federal, state, and tribal agency partners present.

¹⁴ Progress Report at 86, available at <https://www.boem.gov/Semi-Annual-Work-Plan-and-Progress-Report/>.

¹⁵ As stated in the Plan at 101, “... the RPB will develop a performance monitoring and evaluation plan (PME plan) to provide the RPB, stakeholders, and the public with the tools to determine whether and how effectively the planning actions implemented by the RPB are achieving the specific objectives they are intended to advance. Key components of this PME plan will be the Framework goals and objectives, interjurisdictional coordination actions presented in this Plan, and a series of indicators ... that will be used to measure the effectiveness of specific actions.” Additional details are at Appendix 6, available at <https://www.boem.gov/Mid-Atlantic-Regional-Ocean-Action-Plan/>.

¹⁶ This idea is supported in the Plan’s Appendix 6: “Indicators that measure and evaluate Plan progress by focusing on actions related to addressing institutional coordination, *stakeholder engagement and satisfaction*, and the achievement of implementation Plan milestones may provide managers, stakeholders, and the public with more useful information by which to assess progress.” Emphasis added. Plan at <https://www.boem.gov/Mid-Atlantic-Regional-Ocean-Action-Plan/>.

¹⁷ See, for example, the Plan at 35: “Project proponents should seek to identify, engage, and incorporate information from stakeholders before filing a permit application or otherwise formally initiating the environmental review and permitting process, to ensure that stakeholder information helps inform both the project application and subsequent public, stakeholder, and agency review.”

Thank you for the opportunity to provide our recommendations on the draft meeting materials. Many of us are attending the January 24th meeting and look forward to seeing you and hearing your deliberations. In the meantime, please feel free to reach out to any of us with questions on the items noted here. Again, we thank you for your efforts to improve the health of our oceans and the communities which depend on them.

Sincerely,

Alison Chase
Senior Policy Analyst
Natural Resources Defense Council

Kris Hoellen
Senior VP/ Chief Conservation Officer
National Aquarium

Matt Gove
Mid-Atlantic Policy Manager
Surfrider Foundation

Pam Lyons Gromen
Executive Director
Wild Oceans

Merry Camhi, PhD
Director, New York Seascape
New York Aquarium
Wildlife Conservation Society

W. Mark Swingle
Director of Research and Conservation
Virginia Aquarium and Marine Science Center

Sarah Winter Whelan
Ocean Policy Program Director
American Littoral Society

From: **MidAtlanticRPB, BOEM** <boemmidatlanticrpb@boem.gov>
Date: Tue, Feb 13, 2018 at 2:39 PM
Subject: Re: ERA working group
To: Jeff Deem <deemjeff@erols.com>

Thank you for your message, and for participating in the MidA RPB public webinar today. We will share your message with Tony and Karen, and post it on the MidA RPB website. Please continue to share any additional input with the MidA RPB.

On Tue, Feb 13, 2018 at 12:29 PM, Jeff Deem <deemjeff@erols.com> wrote:

Tony:

Good afternoon.

Please let Karen know that if I can be of service on the group as a SLC member please let me know.

Thanks,

Jeff Deem

From: **MidAtlanticRPB, BOEM** <boemmidatlanticrpb@boem.gov>
Date: Thu, Mar 8, 2018 at 1:19 PM
Subject: Re: Comments on the Mid-Atlantic Regional Planning Body 2017 Draft Semi-Annual Work Plan and Progress Report, December 2017
To: Kenneth Warchal <kmwarchal@aol.com>
Cc: "MidAtlanticRPB@boem.gov" <MidAtlanticRPB@boem.gov>, Helen Henderson <helen@littoralsociety.org>, mtsport64@aol.com

Thank you for the letter from the Jersey Coast Anglers Association and for providing comments on the MidA RPB 2017 Draft Semi-Annual Work Plan and Progress Report. We appreciate your recommendations.

We will share your letter with the members of the MidA RPB for consideration as we continue our work. We will also post your letter to the written public comments section on the MidA RPB webpage. Please continue to contact us with any additional comments you may have.

Please note that we will soon post a recording of the Feb. 13 public webinar on the MidA RPB website. The website will also be updated with information about the next in-person MidA RPB public meeting, which we hope you will be able to attend (<https://www.boem.gov/MidA-New/>).

On Thu, Mar 8, 2018 at 12:14 PM, Kenneth Warchal <kmwarchal@aol.com> wrote:

From: **Kenneth Warchal** <kmwarchal@aol.com>
Date: Thu, Mar 8, 2018 at 12:14 PM
Subject: Comments on the Mid-Atlantic Regional Planning Body 2017 Draft Semi-Annual Work Plan and Progress Report, December 2017
To: MidAtlanticRPB@boem.gov
Cc: helen@littoralsociety.org, mtsport64@aol.com



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March 8, 2018

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Submitted electronically via MidAtlanticRPB@boem.gov

Re: Comments on the Mid-Atlantic Regional Planning Body 2017 Draft Semi-Annual Work Plan and Progress Report, December 2017

Dear Ms. Finch, Ms. Leonard, and Ms. McKay,

We were disappointed by the cancellation of the January 24, 2018 Mid-Atlantic Regional Planning Body meeting in Philadelphia and we were unable to participate in the February 13th webinar. However, on behalf of the Jersey Coast Anglers Association (JCAA) we ask that you please consider these comments on the Mid-Atlantic Regional Ocean Action Plan (The Plan) implementation and the Mid-Atlantic Regional Planning Body 2017 Draft Semi-Annual Work Plan and Progress Report (Work Plan) at this time.

Comments on the Mid-Atlantic Regional Ocean Action Plan

The JCAA thanks the Regional Planning Body for its work thus far on The Plan. We have expressed our general support for the Mid-Atlantic Regional Ocean Action Plan and hope to continue to be able to do so. We are especially interested in enhanced stakeholder coordination opportunities as outlined in The Plan on Page 35, Best Practices for Enhanced Coordination: 2.1.3 Enhance Coordination with Stakeholders. We are primarily interested in coordination and information sharing as it relates to 2.4.2 Ocean Energy and 2.4.6 Sand Management and the fishing community.

Please read my Op-ed in support of the ocean planning process which ran in the Asbury Park Press in New Jersey. It highlights the benefits seen by our community regarding our concerns about offshore sand mining (click [here](#) to view and also a copy is also provided with this correspondence for ease of reference).

Comments on the Mid-Atlantic Regional Planning Body 2017 Draft Semi-Annual Work Plan and Progress Report
2.4 Actions to Foster Sustainable Ocean Uses

- **Ocean Energy 2.4.2 – Action 6: Enhance BOEM engagement of fishing industries through improved data and specific interactions** (OAP Pages 55-56)

Work Plan: Ocean Energy, Action 6 page 41, June – Nov 2017 Progress on Best Practice 2.1.3 “Enhance Coordination with Stakeholders” only notes a public workshop and webinar on Atlantic Offshore Renewable Energy Development and Fisheries hosted by the NAS Fisheries Steering Committee, sponsored by BOEM in New Bedford, MA to inform and advance the research and monitoring needed to assess fisheries impacts from offshore wind. This provided little to no benefit for coordination with Mid-Atlantic recreational fishing stakeholders.

Comment: January – June 2018 Milestones and expected dates for steps and substeps to be taken offer little in the way of “*specific interactions*” referenced within the OAP 2.4.2, as noted above.

We are concerned and disappointed by what we feel has been limited stakeholder engagement and coordination opportunities through the ocean planning process as it relates to recent developments in areas designated for offshore wind in the Mid-Atlantic. We respectfully request a more robust and fully engaged stakeholder process with the recreational fishing community as outlined in the Ocean Action Plan, Ocean Energy Action 6 “Enhance BOEM engagement of fishing industries through improved data and *specific interactions*”, Steps to accomplish this action, A, B, and C (OAP Page 55-56) including but not limited to *open houses, environmental studies meetings, and forums*. The fishing community must be part of the planning for stakeholder engagement events. Dates, locations, development of agenda items, and the ability to share details in advance with fellow anglers are what will make these interactions most meaningful and productive. We recommend polling fisherman to determine best options.

- **Commercial and Recreational Fishing 2.4.3 – Action 2: Continue to actively engage stakeholders in fisheries science and management, and seek ways to make fishermen’s knowledge available for planning.** (OAP Page 58)

Work Plan: Commercial and Recreational Fisheries, Action 2 Page 47, June – November 2017 Progress on Best Practices 2.1.3 “Enhance Coordination with Stakeholders” only notes that “Meetings have occurred and are planned with recreational fisherman and commercial fisherman”.

Comment: The January – June 2018 Milestones and Expected dates for steps and sub-steps to be taken only provide “*Potential plans for a Mid-Atlantic region recreational fisheries management workshop*”; “*Continue outreach efforts*” (with no further explanation); and meeting planned *in the near future* in VA. We respectfully request that the RPB do better with information sharing, planning for engagement, and specificity of the Work Plan so our community can know what to expect for stakeholder engagement over the next 4 months and beyond.

- **Sand Management 2.4.6 –**

Action 1: Promote strategic stakeholder engagement and regional partnering initiatives (OAP Page 64 – 65)

Work Plan: Promote strategic stakeholder engagement and regional partnering initiatives, Action 1 Page 56, June – November 2017 Progress “Engage Stakeholders – BOEM met with fishermen about BOEM process in identifying sand resources and authorizing use of OCS sand as well as issues concerning dredging and potential impacts regarding sand resources off New Jersey in July 2017.”

Comment: The January – June 2018 Milestones and Expected dates for steps and sub-steps to be taken on this action is silent about future stakeholder engagement. Again, the ability for fishermen who have very packed schedules during the spring and summer can best be matched up when agencies give us as much notice as possible. Stating that the RPB has nothing planned on ensuring *strategic* engagement regarding sand when sand management continues to move ahead, especially in New Jersey, gives the appearance that the RPB is unconcerned about thinking ahead about stakeholder engagement.

Action 5: Engage fishing communities in planning and environmental review of proposed activities (OAP Pages 67-68)

Work Plan: Engage fishing communities in planning and environmental review of proposed activities, Action 5 Page 65, June – November 2017 Progress “BOEM met with NJ fishermen, USACE Philadelphia and New York District representatives, NOAA, and NJDEP on July 26 in Toms River, NJ, to address fishermen’s concerns on offshore sand dredging”. This is reiterated for Progress on Best Practices 2.1.3

The January – June 2018 Milestones and Expected dates for steps and sub-steps to be taken on this action are extensive. We offer the following comments:

- A. “Communicate BOEM’s sand resource management strategy and prioritization of OCS sand resources to avoid use conflicts with fishing grounds.
- BOEM engaging fishing communities to avoid use conflicts in New Jersey; working with USACE and NJDEP to coordinate proposed OCS sand resource areas with fishing communities and develop a strategy; meeting with fishing community representatives in 2017; coordinating with MidA States to identify contacts within the fishing communities to ensure effective communication and outreach occurs for each project.
 - In early 2018, BOEM will begin to post requests for OCS sand on its website in order to give interested groups such as fishermen notification of pending potential projects.
 - BOEM anticipates a follow-up meeting with the fishing community in 2018.”

Comment: We reiterate our concern above and again request a more robust and clearly identified plan for stakeholder engagement. We appreciate the meeting held in July 2017 but found the meeting to be disorganized and the call-in participation option was confusing. The meeting focus was more of a regional history and, while this was helpful, it is not what the fishing community feels is most needed. We respectfully request improved stakeholder engagement by allowing our community to provide input on agenda topics and speakers when planning future 2018 follow up.

- B. BOEM will communicate its science strategy for fisheries studies in its annual studies planning process and solicit feedback from fishery stakeholders on priority research gaps.
- BOEM will solicit stakeholder feedback in late 2017 on ideas to address priority research gaps for its FY19-21 Studies Plan; continue to solicit feedback in development of short and long term strategy to address priority research gaps related to fisheries.

Comment: The recreational fishing community requests more detail on how we will be made aware of engagement opportunities and further information about how or if our feedback will be solicited for science strategies.

- C. BOEM will continue to inform and solicit feedback from NMFS and regional FMCs and work together to develop best management practices to avoid and/or minimize fishery impacts associated with dredging of offshore sand resources.
- BOEM’s ongoing project-specific EFH consultations; use best available science to inform development of appropriate BMPs for each project-specific scenario; coordinate with NMFS and FMCs in the SOW development for two new fisheries related studies applicable to the MidA in BOEM’s FY17-19 National Studies List.

Comment: The recreational fishing community requests more detail on how we will be made aware of developing best management practices and further information about how or if our feedback will be solicited.

- D. BOEM will use data and information from the Portal and Plan to support enhanced engagement with commercial and recreational fishermen in planning and environmental review of proposed activities.

- BOEM’s geodatabase continues to evolve and will inform the Portal; BOEM specific data coupled with other spatial data within the Portal used as a tool to visually communicate the spatial relationship of proposed BOEM activities with other fishery use conflicts.

Comment: The recreational fishing community requests more detail on how we will be made aware of the Portal’s data and engagement opportunities and further information about how or if our feedback will be solicited for use conflicts.

E. BOEM will identify potential conflicts or concerns through review of data used for scoping and environmental analyses, and work with fishermen to identify high use areas early on to avoid use conflicts.

- Ongoing

Comment: The recreational fishing community requests more detail about “ongoing” work plan efforts about how our feedback will be solicited to identify high use areas early on to avoid use conflicts.

Lastly, we wish to take this opportunity to thank BOEM for the recent Regional Sand Management webinar. The recreational fishing community understands and appreciates the value of ocean planning. The current Manasquan River Inlet to Barnegat Inlet project and other USACE projects are extremely important in the effort to protect against future loss of life and property caused by coastal storms. Our focus is to also protect marine life and marine habitat in specific areas designated as essential fish habitat and prime fishing areas. Our desire is to entirely avoid mining those areas. We are encouraged with the recently discovered availability of additional usable sand at Borrow Area D for the project. We’re hopeful this additional sand alleviates the need to mine Borrow area F, Manasquan Ridge, and other prime fishing areas for future replenishment needs. We’re also hopeful that the USACE is successful in their ongoing efforts to locate additional inshore sand sources from areas of lesser benthic importance.

Thank you for the opportunity to submit these comments and for your consideration of our concerns.

Sincerely,

Ken Warchal
PFA Chair

WARCHAL: Time to get involved in ocean planning processes

Asbury Park Press Published 9:59 a.m. ET Aug. 21, 2017



(Photo: Joe Raedle, Getty Images)

CONNECTTWEET 30LINKEDINCOMMENTEMAILMORE

For many people, replacing sand on a beach hardly seems connected to catching fish in the water. Along New Jersey's shoreline our towns need to replenish sand to keep our public beaches for recreational enjoyment and ensure that we have strong dunes to protect our coastal communities. But as residents and tourists dig their toes into the soft Jersey shore sand, few realize that the Army Corps of Engineers handpicks sand from specific locations due to its unique quality. The agency often removes sand from ocean bottom lumps that provide marine habitat for ocean critters and prime fishing spots. When the Corps removes these lumps, the fishing spots go away.

Recently, I've been having many conversations with fellow Jersey Coast Anglers Association fishermen and fisherwomen because we share a concern about a particular location – Manasquan Ridge – where a lot of the beach sand will come from in the near future. The Ridge means a lot to those of us who catch summer and winter flounder, bluefish, and false albacore in those waters.

These concerns date back to 2012 when similar projects began happening in Harvey Cedar lumps. Without prior communication with the recreational fishing community, the Army Corps of Engineers removed a sizable amount of sand from this area. Not too soon after, charter and party boats that normally would be taking fishing passengers out were now sitting at the dock. After all, no one wants to pay for a day of fishing when there are no fish to catch.

These fishing areas have been our go-to spots for generations. But it's not just an issue for recreational anglers. With the economic impact the recreation fishing industry has on New Jersey's economy – including supporting restaurants, hotels, tackle shops and boat repairs – the impact of destroying fishing grounds has a ripple effect on all of us.

The good news is that with the introduction of the Mid-Atlantic Ocean Action Plan in late 2016, we now have a process to engage and inform all people who could be negatively impacted by a decision like this one. The Corps' lack of coordination and communication was the biggest problem with the previous sand mining projects. However, with the Manasquan Ridge project, the Army Corps, the Bureau of Ocean Energy Management (BOEM) and the Department of Environmental Protection have utilized the Mid-Atlantic Ocean Action Plan to take real steps toward better communication and greater engagement with our recreational fishing community.

With our input and by using various interactive maps available on the Mid-Atlantic Ocean Action Plan's data portal, the Corps has now recognized the importance of the area for fish. Recreational and commercial fishermen prefer that the Corps take no sand from this area. That's why we spoke to BOEM during a meeting this past week about ways to shift away from sand mining in Manasquan Ridge completely. By having BOEM invite us and listen to our request, we feel better informed ... and heard.

The difference between these two sand mining efforts is clear. But it's more than that. This engagement is critical to our long-term success. The Mid-Atlantic Ocean Action Plan is already helping us share information and coordinate more effectively to help us avoid negative consequences like those we saw in the past.

And this collaboration is also sparking more creative ideas. The fishing community has been recommending ways to maintain some bottom structure for ocean wildlife, such as removing sand in rows instead of clear-cutting the lump or creating artificial structures with clamshells or similar material.

I've seen firsthand how knowledge sharing and proactive ocean planning will greatly improve the execution of the Manasquan Ridge project. Sand mining is moving forward, but with greater input and coordination among all of us who rely on this piece of the New Jersey coastline, I'm more confident we won't unnecessarily sacrifice our fishing spots to replenish our beaches.

It's no question to me that we must continue encouraging our members of Congress to support ocean planning processes with resources and funding they need to move forward. New Jersey has a solution that works. Let's put the Mid-Atlantic Ocean Action Plan to good use.

Ken Warchal is vice president of the Jersey Coast Anglers Association, and co-founder of the Ocean Reef Foundation of New Jersey. He is also a trustee of the Manasquan River Marlin and Tuna Club.