NORTHEAST REGIONAL OCEAN COUNCIL

December 12, 2011

The Honorable Nancy H. Sutley
Chair, Council on Environmental Quality
Co-Chair, National Ocean Council
Executive Office of the President
National Ocean Council
Washington, D.C. 20503

The Honorable John P. Holdren
Director, Office of Science & Technology Policy
Co-chair, National Ocean Council
Executive Office of the President
National Ocean Council
Washington, D.C. 20503

Dear Chair Sutley and Director Holdren:

On behalf of the Northeast Regional Ocean Council (NROC), the purpose of this letter is to express our appreciation for the work being done by you and the National Ocean Council (NOC) staff to begin implementation of the National Ocean Policy and to offer some perspective from the vantage point of NROC for your consideration. The National Ocean Policy brings long-needed national attention and resources to support nine priority objectives that address the most pressing challenges facing our coasts and oceans. As NROC has been focused on regional issues since its inception in 2005, the National Ocean Policy complements and reinforces NROC's work and provides support for NROC to advance its goals. Regarding coastal and marine spatial planning, the National Ocean Policy has the potential to substantially advance regional and state initiatives that have already identified ocean planning and management as a priority, but which stand to benefit from federal support and synchronization while appropriately enabling regions to prioritize which issues will be addressed and lead the planning efforts. NROC looks forward to continued coordination with the NOC and the Northeast Regional Planning Body, when formed. While NROC is moving ahead with its work plan as described below, we recognize that NOC staff are concurrently working on several related guidance and procedural documents regarding National Ocean Policy implementation. In this letter, NROC offers comments for your consideration which are summarized along these four main points:

1. NROC efforts, which are underway, directly advance the National Ocean Policy, and our work will help demonstrate positive outcomes of the National Ocean Policy.
2. We ask for that the NOC swiftly address GCC comments on forthcoming guidance, with an emphasis on incorporating maximum flexibility and minimizing overly prescriptive procedures and protocols.
3. NROC encourages that the NOC coordinate with the regions to strengthen national-level messaging of benefits and successes associated with the National Ocean Policy.

4. We request that the NOC increase its direct engagement and consultation with the regions to identify opportunities for increased efficiency in federal decision-making and efficiency and provide the support necessary to realize regional goals and objectives.

NROC Efforts Directly Advance the National Ocean Policy

Coastal and marine waters support an array of resources and activities that are (and have been for hundreds of years) a vital part of the economy and character of New England, and we are increasingly looking to the ocean to meet new and emerging needs. In the Northeast, ocean-related management issues and the need for a more effective regional response have been recognized as a high priority for years, and in 2005 NROC was founded by the New England Governors in response to this need. As a regional forum for New England states and federal partners, NROC's purpose is to coordinate and collaborate on regional responses to coastal and ocean challenges and opportunities.

Prior to the release of the National Ocean Policy, NROC was building on ocean planning efforts in Massachusetts and Rhode Island to take a regional look at ocean resources. NROC work groups developed and implemented a series of issue-area focused action plans related to energy planning and ecosystem health, for example. Since the adoption of the National Ocean Policy, NROC has focused on several key foundational aspects of regional ocean management and planning. Work completed during this time includes a regional data portal, a publically-accessible web site resource for storing, analyzing, and downloading regional data on human uses and natural resources. NROC also hosted several workshops on ocean planning, and as informed by these public discussions in the region, issued a preliminary framework for regional ocean planning (including a general description of regional goals and objectives, as well as a general outline for a work plan to achieve those goals).

Now, as formal implementation of the National Ocean Policy continues (the National workshop, release of guidance, strategic action plans, etc.), NROC has secured support in the form of new funding and commitments from foundations, NOAA and other federal agencies, and other partners. NROC recognizes that further guidance is forthcoming from the NOC regarding specific elements of the National Ocean Policy, but we are committed to moving ahead with active implementation of a work plan to address our goals. Work over the next two years will emphasize public engagement, science/data acquisition, and development of data products to inform future planning and management. Two examples of ongoing engagement of key partners include NROC's dialogue with both the New England Fisheries Management Council and several of the federally recognized tribes in New England. NROC also anticipates working with its partners on its data development activities (related to spatial patterns of commercial fishing activity, for example).

This work represents the necessary initial tasks to address priority ocean management issues in New England, and in recognition of the need for this work NROC is firm in its commitment to our work plan. Completion of this work plan will result in key steps toward achieving the region's goals. NROC notes that the main aspects of its work plan—public involvement and the application of best available data and science—are also envisioned by the National Ocean Policy as fundamental components of regional ocean planning. Therefore, NROC believes that its work plan is supported by and compatible with the

National Ocean Policy. Our work will help demonstrate the positive outcomes the National Ocean Policy enables.

Development and Issuance of NOC Guidance Documents

Based on discussions with Governance Coordinating Committee representatives and NOC staff, NROC is confident that the issues we have raised regarding forthcoming National Ocean Policy guidance (e.g., composition and function of Regional Planning Bodies, model charter) will be addressed. Specifically, we trust that final guidance documents will be compatible with and flexible enough to meet New England's needs; that process elements associated with the National Ocean Policy and ocean planning will enhance and not burden NROC's efforts; and that implementation of the National Ocean Policy will improve and enhance existing programs (e.g. Coastal Zone Management Programs.)As has been suggested by other regions, NROC requests that the NOC work with each region to ensure that each RPB builds upon existing partnerships and future work plans, thus supporting regional goals and efforts already underway, as this particular aspect of the National Ocean Policy is implemented. In particular, we request that the NOC staff coordinate with state NROC members well in advance of correspondence regarding Regional Planning Body membership to the states' Governors, as we want to align our functions and encourage seamless collaboration between the NOC/RPB and NROC.

National and Regional Messaging on Ocean Planning

In addition to the engagement efforts described above, NROC has been developing messaging (both its substance and delivery) to actively engage constituents in New England to inform them of the initiative and promote their active participation. While substantive and methodological details will vary from region to region, messaging about ocean planning at the regional and national levels need to be compatible. For example, in New England we are aware that while we need to include some discussion about process with stakeholders, we believe that if the primary focus is on communicating tangible, substantive results of ocean planning that respond to regional needs, the message will have greater appeal with many interests in the region. We encourage the NOC staff to redouble its efforts to address the comments of the Governance Coordinating Committee and the National CMSP Workshop participants regarding outreach and messaging for the National Ocean Policy and ocean planning at a national level, building upon the regional efforts underway. Recent Congressional testimony has identified some potential partners for building support at a national level.

Engagement of Federal Partners – New England Model

State members of NROC have been impressed with the level of ongoing engagement of our federal agency partners in the region in support of ocean planning. Participating federal agencies are already working to advance NROC's ocean planning framework. We encourage the NOC to look to the New England Federal Partners as a model for strategic collaborative action planning for federal agencies at a regional level. This is an area where the NOC should serve a key role, to ensure that federal agencies are supporting regional efforts.

Since its inception, NROC has succeeded in helping to work beyond the agency "stove pipes" that can hamper effective coordination, and through the ocean planning and management work underway, NROC anticipates that we will have many other additional success stories to tell (e.g., further identifying

areas for decision-making efficiencies, review streamlining as envisioned by the National Ocean Policy). The coordination of federal agencies to identify and pursue opportunities for streamlining decision-making requires leadership at the national level by the National Ocean Council, and real examples of successes should be part of an overall messaging effort. In other words, the power of this initiative truly lies in the ability of regions to propose real change, and the NOC's political will to help make those changes a reality.

NOC and NROC Coordination Moving Forward

In summary, NROC praises the NOC for its strong leadership to date and looks forward to demonstrating real progress on the ground. As we move forward with our collective implementation of the National Ocean Policy, we ask that the NOC:

- Continue close communication with the Northeast as NROC actively pursues our two-year work plan;
- Swiftly address GCC comments on NOC guidance documents, with an emphasis on incorporating maximum flexibility and minimizing overly prescriptive procedures and protocols;
- Strengthen messaging at the national level with an emphasis on direct, tangible, and near-term benefits of regional ocean planning and management (e.g., greater stakeholder voice, improved data and information to support existing decision-making) to be tailored by regions for greatest effectiveness;
- Communicate with NROC in advance of the issuance of formal guidance and any RPB nomination letters; and
- Work with the regions to address opportunities for decision-making efficiencies and enhanced agency coordination

In conclusion, we appreciate your close attention to our concerns and for your openness in receiving input from the regions. We look forward to continuing our close working relationship with the NOC and staff. Again, thank you for your efforts to bolster regional approaches to priority coastal and ocean concerns.

Respectfully,

Bruce Carlisle
Northeast Regional Ocean Council State Co-Chair
Director, Massachusetts Office of Coastal Zone Management

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Northeast Regional Ocean Council Federal Co-Chair
Acting Deputy Director, DOI Bureau of Safety and Environmental Enforcement

Cc:
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