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Executive Director

June 27, 2013

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Betsy Nicholson
Federal Co-Lead for Northeast Regional Ocean Planning
NOAA Ocean Service
Northeast Regional Office
55 Great Republic Drive
Gloucester, MA 01930-2276

RE: Northeast Regional Planning Body Draft Regional Ocean Planning Goals

Dear Ms. Nicholson:

The Association to Preserve Cape Cod (APCC) submits this letter as part of the public comment for the Northeast Regional Planning Body's Draft Regional Ocean Planning Goals.

Founded in 1968, APCC is the Cape's leading nonprofit environmental advocacy and education organization, working for the adoption of laws, policies and programs that protect and enhance Cape Cod's natural resources and quality of life. APCC is a member-based organization supported by over 5,000 members across the entire Cape Cod region.

A primary focus of APCC's mission is to help ensure the protection of the region's coastal and ocean resources. A significant percentage of this effort includes working with local, regional, state and federal partners to restore the Cape's coastal resources and ecosystems, which are a keystone in the Cape's coastal economy. APCC believes strongly that coastal resources have a direct and critical relationship to ocean ecosystem health, and are also closely linked to the economic viability of the commercial fishing industry and the coastal-ocean economy.

In its current draft form, the Regional Ocean Planning Goals fall short in acknowledging the inseparable connection between ocean resources and key coastal resources such as estuaries, coastal salt marshes and migratory fish runs and spawning habitat. This unrealistic partition fails to take into account the effects of coastal activities on the ocean, and will only lead to an incomplete and ineffective ocean plan.

For example, properly functioning salt marshes are an integral piece of the nearshore coastal zone, but are also essential for the health of ocean resources. Seventy-five percent of the fish species that are important to our region's commercial fisheries rely

on salt marshes as habitat for spawning, protective nursery or a source of food. Salt marshes also remove a significant portion of nutrients and other pollutants, which would otherwise enter the ocean, thereby protecting ocean resources from the effects of these pollutants.

Another example of the inextricable linkage between coastal and ocean resources are diadromous fish such as river herring and American eels. At different stages in their life cycles, these fish rely upon both coastal and ocean ecosystems for their survival. Improving their habitat in the coastal zone (e.g., restoring fish runs and spawning habitat for river herring and other diadromous fish species) helps to sustain and increase populations of these species in the ocean. Herring are a critical food source for many commercially important marine finfish and also play a key role in the coastal food web. Restoration activities in the coastal zone help to ensure that declining herring populations will recover, and in turn will help sustain ocean-based populations of commercial fish species.

A third example of how coastal activities impact ocean ecosystems is poor water quality caused by land-based pollutants, such as stormwater runoff and nutrient loading from septic systems. These pollutants negatively impact coastal ecosystems as well as the ocean resources that the Northeast Regional Planning Body has identified as important, including environmental, economic, cultural and recreational resources.

Because of the integral connection between coastal resources and ocean resources, APCC recommends that coastal resources—and efforts to protect, restore and improve them—be incorporated into a truly comprehensive set of Regional Ocean Planning Goals. Acknowledging the relationship between coastal and ocean resources in the set of goals will help guide creation and implementation of a more effective plan for our ocean resources.

APCC thanks the Northeast Regional Planning Body for this opportunity to comment.

Sincerely,



Ed DeWitt
Executive Director