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**Sent:** Friday, December 19, 2003 9:50 AM

**To:** Oceanmgtinitiative, (ENV)

**Cc:** Malcolm Brown; Andy Stern

**Subject:** Comments of HullCARES on Draft by Ocean Task Force

## Comments to the Task Force on Ocean Resource Management

The draft Principles and Preliminary Recommendations for managing the Commonwealth's ocean resources describes a great task. I hope that the goals described here are the basis for a deep and wide debate about modern society's impacts on the environment that sustains human life, and the natural world around us. The Task Force and the legislation proposed must be concerned with a sufficiently wide planning area, or scope of interests, impacting activities, and effects of those activities. This policy effort will fail if the scope does not include impacts from fossil-fired power plants, (primarily global warming), and make recommendations regarding offshore development of energy resources. The Task Force is looking for answers, and must recognize the question of energy and impacts on the ocean is not narrow.

If the rest of the resources and benefits of the Commonwealth's ocean are to be protected and managed for future use, the impacts from fossil-fired power plants on the ocean can not be ignored by the Task Force or the Ocean Resource Management Act. The deposition of mercury from burning coal contaminates the fish stock, which reduces the value and health of several important fish species. The more widespread effect of the cumulative greenhouse gas emissions warming the water causes much greater damage to the Commonwealth. Global warming effects the food chain from plankton to sea mammals. Sea level rise threatens productivity and habitat, both human and aquatic. Increased storm intensity and sea level rise damages all the human investments made on the coast. Will the Final Recommendations of this Task Force find any importance to protecting the ocean's resources from this harm?

The central link between reducing fossil-fired power plant emissions and the work of the Task Force is windpower in the offshore zone. Massachusetts has a pivotal role to play in offshore windpower development. It is essential that the Task Force make the link between fossil-fired power plants causing damage throughout the food chain and habitats of the ocean, and the replacement of fossil-fueled power plants through windpower plant development offshore.

The wind energy development potential that has recently come to the public's attention is not a passing fad or minor contribution to the Commonwealth. The productive use of the wind on and above the water's surface is a major factor in the economic development of Massachusetts through the initial ocean transport of settlers, the fishing under power of sail, the ship-building, and the trading by sail-powered ships. Use of wind energy in the waters around the Commonwealth is a long tradition. The Task Force references to historical resources should make the connection between this tradition of economic activity using the ocean's wind resource, and the future use of wind energy in windfarms.

The Ocean Management Task Force should include in its recommendations for the future management of the oceans an explicit provision for study of the electricity-production potential of the Commonwealth's offshore zones and comparison with the electricity production in Massachusetts from burning oil and coal. The Principles in the draft of Fostering Sustainable Uses, and Using Best Available Information will be meaningless if the Task Force does not call for better understanding of the energy production potential of the Commonwealth's ocean resources. The Task Force should also make explicit statements that the reduction of global warming gas emissions through ocean energy resource development is a benefit to protection of the coastline, the fish stocks, the habitats and the natural, productive life of the oceans.

The Task Force is explicitly charged with providing guidance for policy on ocean resource management. If the Draft did not mention global warming and greenhouse gas emissions because no link could be found with ocean resources, then that can be corrected. The supply of electric power is a topic well-known to the Chair of the Task Force. When the development of wind energy resources is reviewed, the link to fossil-fuel burning power plants can not be ignored. When the impacts of the fossil-fuel burning on the oceans resources is compared to the impacts of wind power development, the Task Force and the ocean management plans will have the proper scope. The area of study can not limit the discussion of windpower development to aesthetic concerns and ignore the impacts on the Commonwealth's ocean resources due to fossil-fuel burning power plants.

The draft Principles and Preliminary Recommendations need to be expanded to address the major threat of global warming to the ocean resources. Fortunately, the Commonwealth has a ready response to address a major source of harm to the ocean's resources in renewable energy developed offshore, especially wind power. In these comments, and in the scope of the Task Force work, a problem and a solution to that problem are presented. It is incumbent on the Task Force to include global warming as a threat, and windpower development offshore as a mitigation of that threat.

Respectfully submitted,

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