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From: G. M. Woodwell [<mailto:gwoodwell@whrc.org>]  
Sent: Friday, December 19, 2003 5:55 PM  
To: Oceanmgtinitiative, (ENV)  
Cc: Allison White  
Subject: Draft Principles Massachusetts Ocean Management

Mr. Susan Tierney, Chair  
Ocean Management Task Force  
State House, Boston, Mass.  
oceanmgtinitiative@ state.ma.us

Dear Ms. Tierney,

I am a scientist concerned over 40 years with management of common-property resources. I am pleased to have read the draft principles for Massachusetts Ocean Management dated December 2003 and am struggling to meet your deadline. The schedule has allowed very little time for public review of a strangely incomplete document. The cramped schedule opens a question as to the intent and purpose of the principles that they must be advanced so precipitously.

We have the advantage of the recent Pew Commission Report which sets out quite comprehensive and reasonable objectives for management of the coastal zone. They are obvious objectives. They are not well-addressed in the draft principles.

The central issues in management of the coastal waters of the Commonwealth and all other coastal states are also well stated in the introductory paragraphs in the Water Pollution Control Act Amendments of 1972 and subsequently as the restoration and protection of "the physical, chemical, and biotic integrity of the nation's waters...".

Biotic integrity is the key, and it requires the attention of all in preserving not only fish and fisheries but also the microbial populations of plants and animals, and the higher plants of the coastal zone. The protection involves protection from chemical changes, pollution, in particular. The pollution derives from surface drainage and from being washed out of the atmosphere. There are many sources and types of pollution of course, not discussed here. I call attention to those associated with fossil fuel transport and use, a major problem. Mercury pollution from coal-fired power plants is an especially troublesome issue in that the mercury in organic form is accumulated in fish and birds and is a hazard to other organisms including people. These problems are not mentioned, although considerable effort goes to attempting to redefine jurisdictions.

In Recommendation Number 5 a fee structure is advanced, apparently designed to tax any commercial uses of the coastal waters such as the development of a wind farm or other offshore energy developments. You propose that fees be reserved for ocean-related purposes and not referred to the general fund. The fee structure can, of course, be used to discourage, or even make impossible, wholesome offshore developments of energy that would be pollution-free and enduring as opposed to our current fossil fuel sources.

Item Number 6 introduces esthetics as a major consideration. Introducing esthetics while ignoring major contributions to coastal pollution seems to me to be a distortion of the public interest. Could it be that this strange adventure is at the behest of limited special interests? I find that recommendation specialized, partial and extremely difficult to implement objectively. I recommend that you drop it.

Recommendations 7 & 8 call for increased opportunities for public participation. One would not argue against that, but one would observe that the opportunities for public participation in the development of these recommendations are being limited. Are you serious? Or, again, partial?

Recommendation Number 9 and subsequent recommendations deal with the accumulation of data and monitoring experience in the coastal zone. A scientist would not usually argue against such a purpose, but it can, of course, as all know well, be used to frustrate any action whatsoever. In view of the lack of attention to pollution of the coastal zone with fossil fuels, various toxic substances associated with industrial releases and with shipping, and the effects of increased industrialization in that region, these items and the emphasis on physical structures seem distorted.

One is impressed that this entire procedure is aimed at deflecting one development, the proposed wind farm for Horseshoe Shoal in Nantucket Sound. That development should be discussed on its merits, including its contribution to avoiding further development of fossil fuel resources and use that are already contaminating air and water and land on Cape Cod and throughout the coastal region of Massachusetts.

My suggestion is that if additional regulations for controlling use of the coastal zone are appropriate, as they may be, a much more comprehensive review be produced carefully referenced to existing regulations, both those of the Commonwealth and national regulations, and that the interests defined in recent reviews such as the Pew Commission and the forthcoming federal commission be incorporated.

I suggest that this ad hoc effort be set aside until a thoroughly responsible and appropriately staffed and financed effort can be mounted. Meanwhile, there is in place a comprehensive set of overlapping requirements for developments in the coastal zone that involve the preparation of an environmental impact statement. That procedure is underway and should be endorsed. I have not seen evidence that the procedure is inadequate. Quite the opposite. It has the advantage of thirty years of experience behind it.

Yours truly,

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