Friends of Penobscot Bay

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Comments on the six priorities of the Draft Northeast Ocean Plan

Friends of Penobsot Bay is an incorporated citizens' association dedicated to protecting, conserving and remediating the habitats, water quality and other needs of the seafood species of Maine's biggest bay, and their ecological cohabitants. We applaud the adoption of the six priorities as a way of focusing planning, and look forward to the adoption of the NE Ocean Plan

The Six Priorities

1. Improve understanding of marine life and habitats.
2. Improve understanding of tribal cultural resources.
3. Improve understanding of human activities, coastal communities, socioeconomics, and interactions between uses.
4. Characterize the vulnerability of marine resources to specific stressors.
5. Characterize changing environmental conditions, particularly resulting from climate change, and characterize resulting impacts to existing resources and uses.
6. Advance ecosystem-based management (EBM) by building on the previous priorities and also including cumulative impacts and ecosystem services

Comments on the priorities

Priority 1. Improve understanding of marine life and habitats.
This is the most important, most fundamental priority. The New England Fishery Management Council has developed a plan that would go great strides toward increased understanding of both offshore coral habitats and of shallow water habitats needed by the Gulf's inshore juvenile cod and the young of many other fishes, which, too, live at least part of their lives in new england shallows.

We ask that these Important Ecological Areas, known as Habitat Areas of Particular Concern or HAPCs, be specifically noted in the NE Ocean Plan. They are nearly through federal review and shortly face enactment.

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While there are offshore HAPCs of great importantce, FOPB is particularly interested in the coming designation of the the entire New England coast, from low tide to the 20 meter depth contour, as a Juvenile Cod Habitat Area of Particular Concem for inshore Juvenile Atlantic Cod.

This designation recognizes the particular importance of rocky shallow water habitats and good water quality in the survival of coastal juvenile cod from age zero larvae to up to these fishes' 3rd year.

In order to conserve these habitats, they need to be mapped and ecologically inventoried. That way, local, state and federal environmental officials will have both knowledge of the existing habitat and water quality and from that, determine the probable impacts to consider
when applications for coastal development arise. Protect the water quality and habitat quality
needed not only by cod but also their co-habitants.

Priority 2. Understanding of tribal cultural resources.
A. Early native american coastal sites at risk of immersion. Even at his time, there are numerous significant native americans paleoarchaeology sites along our Gulf of Maine coast and the so-called Red Paint People their predecessors, who rarely settled away from tidal waters.

Many sites have already been drowned or are now facing site immersion as water levels rise. It is especially important to survey all ravines along the Maine shore that empty into the Gulf of Maine or a bay or tidal river. These “waste” lands are sometimes that last bit of land native americans were allowed to live in from the 18"‘ to the 20*" century. Coastal developers need to ascertain whether a ravine proposed for filling actually contains artifacts of such past long
term encampments

B. Reasserting Penobscot commercial fishing rights in Penobscot Bay.
Members of the Penobscot Nation have fished Penobscot Bay for thousands of years. If significant portions of the Penobcot Nation's **river** fishing grounds have been contaminated or otherwise made unfishable, then the tribe could be granted compensatory finfishing rights in Penobscot Bay.

Priority 3. Understanding human activities, coastal communities, socioeconomics, and interactions between uses.

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A. Ocean windpower. With the recent federal decision to fund the UMaine led Aqua Ventus project to build and operate utility scale large floating wind turbines two miles off Monhegan, we are going to begin exploiting the western Gulf of Maine airshed with what could become deepwater floating windparks.

It is important that the well-documented impacts of ocean windpower extraction be Offshore wind is an extractive industry. While the exploited product is energy rather than a physical material, there is still an alteration of habitat and in this case the energy budget of the surface waters within the project's wind shadow is reduced, with comcommittant reduction in water velocity there

We will have an opportunity to aid the tiny Monhegan community that must interact with academia, large energy companies and otyer interests involved in the AquaVentus project. They are responding to the challenge
 opportunity to learn about the impacts of the windshadow and upwelling created by floating wind turbines as they extract energy from the wind. For renewable it may be, but it is still an extractive industry and needs to be managed as one.

Priority 4. Characterize the vulnerability of marine resources to specific stressors
This will be critical to the success of the inshore juvenile Cod HAPC mentioned above. Focus: Legacy Wastes. What and where are the chemical and petroleum wastes now leaching into coastal waters that were spilled or dumped in the 19'" and 20"‘ centuries? How much coal tar lies buried near the sites of the dozens of long gone coal gasification plants? How much acid waste from 19"‘ and 20"‘ century chemical & fertilizer factories? Tanneries? Many have been remediated but most have not. Ocean planners need enlist academia and NGOs to locate these sad legacies of a more ecologically thoughtless time and factor them into planning.

Priority 5 Characterize changing environmental conditions, particularly resulting from climate change, and characterize resulting impacts to existing resources and use .
Inshore trawl surveys, beach seining and two video surveys are necessary to actually discover and map those changing conditions and identify what biota are exploiting the changes.

Priority 6 Advance ecosystem-based management (EBM) by building on the previous priorities and also including cumulative impacts and ecosystem services.

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A wildlife ecosystem sector that has received very little oversight and conservation is the world of the natural marine microbes that are the living fabric upon which our fish, shellfish. For example, unless there is a minimum density of soft protozoa available for larval cod many of those fishes never grow up to become commercial resources, let alone part of the food chain. Source WHOI.

The cumulative impact of failures among microbial species would become enormous in scope throughout the greater marine macro-ecosystem. We ignore that immense kingdom of life, the Prokaryotic Kingdom, at our own peril.

Thank you for this opportunity to present our concerns and ideas

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