

February 13, 2004

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Susan Tierney, Chairman  
Ocean Management Task Force  
Executive Office of Environmental Affairs  
251 Causeway Street  
Boston, MA 02114

RE: Public Comment on Ocean Management Task Force Recommendations

Dear Ms. Tierney,

The OMT Draft Principles appear to be an effort in redundancy. I don't feel anyone would question that the principles listed are of the utmost importance. However, they reiterate the known. Our frontline state agencies that deal with any type of marine resource management would be using all or a great sub-set of these principles listed within their executive order to serve the Commonwealth.

With the Governor's efforts and insistence on consolidation and reduction of government, I'm concerned and confused about a recommendation for more government. Why is there a need to create another layer of bureaucracy? The framework and hierarchy is already in place. If there were an actual or perceived problem with the current structure, it would make sense to me to address that problem instead of ignoring it and having decisions made at a higher level. Change is good and necessary. Some things may need changing in the system but part of the OMT's recommendations should also be efficiency, not added cost and bureaucracy.

With recommendations relating to fees, I read this to be a proposed increase on existing fees and the establishment of new fees to be directed to a 'dedicated' account. The Governor has already made it quite clear that he is not a proponent of dedicated funds as his budget overhaul indicated. With particular attention to the Inland Fish and Game dedicated fund, the Governor did not heed warnings that close to \$5 million in Federal reimbursements would be lost if that dedicated fund were to be diverted to the general fund. It wasn't until the Federal government formally notified Massachusetts officials they had 30 days to rectify the situation did the Governor take action. Given that past history with dedicated funds, I'm not convinced there is any assurance this fund wouldn't be subsequently diverted back to the general fund.

I feel the entire context of recommendation 9 is a complete disservice to those extremely dedicated staff and scientific professionals that work in the front line agencies dealing with our marine resources. From a state-waters standpoint, I've yet to uncover exactly what the OMT finds so objectionable regarding the current level of protection of marine species and habitats. Specifically, what issues are currently categorized as being detrimental to the long-range goals of current marine management objectives? If you can think of one that is under direct and sole authority of the Commonwealth, how does that issue compare to our everyday,

real-world issues such as highway safety, social services or education? We will never live in a perfect world. There is a cost associated with living in a society (Tragedy of the Commons).

Continuing with recommendation 9, I strongly feel that the suggestion of legislatively granting power to a government entity to randomly close off areas of our state jurisdictional waters is clearly an effort from special interest groups. Having been exposed to the myriad of the marine management process for close to 10 years, I recognize Recommendation #9 as being a product of special interest. There is no justification for arbitrarily creating marine reserves with public trust land for the benefit of private conservation organization goals. However, the use of seasonal area closures (based on biological need) have been a tremendous success to habitat and marine life protection management objectives both in state and federal waters.

Recommendation #10, #11 – What specific scientific information or research does the OMT feel is needs improvement or does not exist? We live in the age of electronic communication. The OMT web site is a perfect example. The data is out there for use and it doesn't take long to acquire using today's technology. Again, the OMT's recommendations should be for efficiency, not added cost and bureaucracy.

There is a statement in Recommendation #10 reading 'there is a general lack of understanding (as to type, distribution, abundance) of marine species and habitats that require special attention'.

That is a pretty remarkable statement for a panel of resource/environmental experts to be making. What is it specifically that the OMT feels the state should be researching that hasn't already been studied and documented in some form by any one of the following:

National Oceanic and Atmospheric Administration  
National Marine Fisheries Service  
Environmental Protection Agency  
Northeast Consortium  
National Marine Fisheries Service Cooperative Research Partners Initiative  
New England Fisheries Management Council  
New England Aquarium  
Northeast Fisheries Science Center  
Atlantic States Marine Fisheries Commission  
Atlantic Coastal Cooperative Statistical Program  
Marine Recreational Fisheries Statistical Survey  
Woods Hole Oceanographic Institute  
US Fish and Wildlife Service  
Center for Coastal Studies  
MA Div. of Marine Fisheries Management Information Systems and Fisheries Statistics Project  
MA Div. of Marine Fisheries Resource Assessment Project  
MA Div. of Marine Fisheries Conservation Engineering Program

Do we really need yet another group to perform marine scientific research? Shouldn't we be taking advantage of economies of scale and trying to create better cooperative research instead of another splintered entity?

In summary, the OMT should be recommending elements of efficiency along with the recommendations for an ocean resource management plan. The draft public comment document does little to take advantage of what already exists for data and professional expertise. In these times of fiscal uncertainty, we need to make more with less. Throwing more resource, bureaucracy and redundant scientific data into the ocean management process will likely not accomplish the long-range goals the Governor is seeking. In addition, the goals of private conservation organizations or special interest groups should not be part of any policy-making proposal.

Sincerely,

Charles T. Casella