



January 31, 2003

Massachusetts Ocean Management Task Force
251 Causeway Street, Suite 800
Boston, MA 02114-2136
Fax: 617-626-1240

Comments on Draft Principles and Recommendations

We are writing as members of Environmental Entrepreneurs (E2), a volunteer group of business and professional people who support good environmental policy based on its economic merits. We represent over 450 business leaders nationwide, who collectively have founded over 800 companies that have created at least 400,000 jobs. Our members from the investment community manage over \$20 billion of private equity capital, ready to be invested in new businesses. E2 is non-partisan and very diverse, but we all believe that good environmental policy is good for business.

We commend the state for creating the Ocean Management Task Force and taking a pro-active approach to managing this extremely important resource.

Oceans: a national treasure now and in the future

As a business community, we recognize the enormous impact of ocean resources and activity on our region's economy, culture, and history. Our oceans are a national treasure that must be responsibly managed for the benefit of all -- not only those with a direct economic interest in the resources. All Americans depend on the oceans and affect the oceans, regardless of where they live or how they earn their living. Thus, we strongly support the Task Force's guiding principles; especially number 1 that "ocean resources are held in trust by the government for the use and enjoyment of its citizens now and in the future."

We are pleased to see significant overlap between the recommendations of the Task Force and those of the Pew Oceans Commission. We strongly support the conclusions of the Pew Report that America's oceans are in crisis and that a comprehensive ocean policy must make healthy marine ecosystems the priority.

Coherent policy requires a strong management framework

On both the federal and state level, E2 strongly supports the concept of comprehensive legislation and a strong, dedicated governing body to address the current fragmented and chaotic ocean management policy and lack of coordination across geographies and government agencies. Thus we agree with Task Force recommendation number 1 that taking a broad-based, pro-active approach which incorporates the agreed upon principles is the best way to ensure protection of vital resources while also clarifying the process for allowable economic activity. We believe this should be the Task Force's number one priority. While this may be politically challenging, we believe that the best way to rationalize ocean management policy is through a single, comprehensive statute that mandates procedures and cooperation among competing agencies and interests. As part of that statute, we endorse the Task Force recommendation for planning areas to improve marine conservation, actively plan ocean use, and reduce conflicts. It is an unfortunate fact that we as a species are very shortsighted when it comes to considering the long-term impact of the activities we

SAN FRANCISCO

71 Stevenson Street, Suite 1825
San Francisco, CA 94105
Phone: (415) 777-0220
Fax: (415) 495-5996

NEW YORK & NEW ENGLAND

40 West 20th Street
New York, NY 10011
Phone: (212) 727-2700
Fax: (212) 727-1733

SANTA MONICA

1314 Second St.
Santa Monica, CA 90401
Phone: (310) 434-2300
Fax: (310) 434-2399

undertake. Therefore, we cannot emphasize enough our strong feeling that without new legislation to clearly mandate effective policy, we cannot reverse the trend of degradation of our oceans that is under way.

Preservation of biodiversity and ecosystem integrity

One of the primary reasons for a clearly articulated ocean management plan is to provide a framework to resolve the inevitable conflicts of interest in the use versus preservation of ocean resources. We believe that biodiversity and integrity of the environment should be the primary consideration in such conflicts. While Task Force principle number 2 endorses the value of biodiversity, the Task Force recommendations fail to address one of the most important causes of ocean environmental degradation: nonpoint source pollution. Contaminants such as mercury, fossil fuel run offs, industrial toxic wastes, and nutrient pollution have a critical effect on biodiversity. By integrating pollution control with growth management and land-use planning on a watershed basis, the state can reduce polluted runoff and protect both freshwater and coastal habitats.

In addition, the use of marine protected zones offers a proven approach to preserving environmentally sensitive lands and significant species, habitats and spawning grounds. Thus, we support Task Force recommendation number 4 to clarify and update the regulations implementing the Oceans Sanctuary Act and recommendation number 9 to ensure that environmental agencies have sufficient authority to designate such areas.

Comprehensive monitoring and research

We agree that data collection and monitoring of water quality, marine species and habitats should be increased and that management decisions should be based on the best available data. Hence, we strongly support Task Force recommendations 10 through 14. Nevertheless, because funding for such activity may be difficult to obtain and effects need to be measured over a long period of time, we believe that the underlying management principle should be one of precaution. We support taking a conservative view when full data is not available, since the cost of policies that destroy an ecosystem is extremely high.

We look forward to further discussion of these issues and future proposals from the task force.

Sincerely,



Harry Cockran
President and CEO, ChangeSafe, LLC
Co-Founder, E2 New England



Daniel Goldman
Managing Partner, New Energy Capital, LLC
Co-Founder, E2 New England



Berl Hartman
Senior Vice President, Blanc & Otus
Co-Founder, E2 New England



Christopher Kaneb
Catamount Management Corporation
Co-Founder, E2 New England



Myron Kassaraba
Business Development Consultant, MJK Partners
Co-Founder, E2 New England