

THE DAVIS COMPANIES

One Appleton Street
Boston, MA 02116
617-451-1300 Fax 617-451-3604

200 Connecticut Avenue, Suite 400
Norwalk, CT 06854
203-866-1220 Fax 203-866-1238

February 6, 2004

Dr. Susan F. Tierney, Chair
Ocean Management Task Force
Executive Office of Environmental Affairs
251 Causeway Street
Boston, MA 02114

Re: Comments to Ocean Management Task Force Recommendations

Dear Dr. Tierney:

I am writing on behalf of The Davis Companies to oppose the Draft Principles and Recommendations circulated by the Task Force. Affiliates of our Company own numerous projects in proximity to the coastal zone. The Task Force's direction appears to be blatantly anti-business and would have a serious detriment to all commercial activities within or affecting the coastal zone.

The Draft Report never demonstrates any serious problem with the status quo and contains no serious discussion of why the existing statutory provisions, if properly managed, would not fully serve the public interest. Given the importance of coastal industries to Massachusetts, any proposal to comprehensively rework the existing statutory structure (which has been carefully developed since the earliest days of the Commonwealth) would require a convincing showing of why the current system is inadequate.

We also seriously question any major expansion of bureaucracy at a time when the Commonwealth faces serious budget constraints. Noticeably absent from the draft is any estimation of the costs of the proposed programs. Further, even if the Task Force were successful in its attempts to assess new taxes upon coastal businesses, any additional revenues would be better allocated to more pressing concerns, particularly in light of proposals to cut funding to health and human service programs.

We also generally support the comments of the Associated Industries of Massachusetts and National Associates of Industrial and Office Properties filed with Task Force, where such entities advised that the proposed change to the existing Chapter 91 program is neither warranted nor wise.

Sincerely,



Jonathan G. Davis
Chief Executive Officer