

Dear Members of the Ocean Management Task Force:

I am submitting these comments on your preliminary ocean management recommendations on behalf of The Humane Society of the United States (HSUS), the nation's largest animal protection organization, to supplement the oral comments I submitted on December 11, 2003 at the Yarmouth Council on Aging.

The HSUS commends the task force on what are largely excellent recommendations, and we encourage you to stay committed to the principles biodiversity and ecosystem management as you refine these recommendations.

It is with acknowledgement of the report's finding that state waters are currently managed through a "somewhat ad-hoc collection of single-sector oriented laws, regulations, and policies" that we seek the assurance of the task force that it will not weaken its recommendations due to pressure from groups or individuals who stand to benefit from the current "ad hoc" management of state waters. The public good would best be served by an organized, consistent ocean management plan that is informed by scientific data and that demonstrates a commitment to the conservation of marine wildlife and ocean habitats.

We strongly support the concept of an Ocean Resource Management Act, as well as the task force's recommendations for inventories of biological resources and uses of ocean waters, increased public access to data about the state's ocean waters, and increased public involvement in management decision-making.

Specifically, our preference would be that the lead role for the development of a state ocean management plan be assigned to a new Inter-Secretariat Council (option 2 on page 5).

Additionally, under "Policy Issues," on page 6, the preliminary recommendations request comment on mitigation strategies and methods and techniques for analyzing cumulative impacts. Mitigation strategies should prevent irreparable damage to wildlife populations due to human uses of state ocean waters. These could include, but are not limited to, the preservation or restoration of species-specific habitat and the protection of such habitat from disruptive human uses. Mitigation, however, should never take the place of proper planning. The analysis of cumulative impacts should involve coordination with other coastal states and any federal agencies overseeing use of federal waters.

We support recommendation 2, which seeks to streamline the state planning and regulatory review processes, because we believe the systems in place would benefit from more transparency; however, we insist that standards of environmental protection be fully maintained.

Recommendation 11 calls for the increased dissemination of data collected on the Commonwealth's resources. This should include not only state-funded research projects and those collected with state-issued scientific permits, but additionally, the state should coordinate with federal and private research entities, where possible, to include their research findings in the state index.

Thank you for the opportunity to submit these comments.

Sincerely,

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