



The Northeast Seafood Coalition

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FEB 23 2004
COASTAL ZONE MANAGEMENT
Exec. Office of Environmental Affairs

February 20, 2004

Susan Tierney
Chair, Massachusetts Ocean Management Task Force
Executive Office of Environmental Affairs
251 Causeway Street, Suite 800
Boston, MA 02114-2136

Dear Chairman Tierney:

I am writing on behalf of the Northeast Seafood Coalition (NSC) in response to the Draft Principles and Recommendations of the Massachusetts Ocean Management Task Force (OMTF). We wish to express our concerns relative to duplicative efforts between the OMTF and the Division of Marine Fisheries concerning the management commercial fishing activity in state waters.

Before detailing these concerns, we would like to applaud the OMTF in its effort to craft a comprehensive ocean plan that will properly manage offshore development and oversee the impacts of land-based projects on our marine resources. Gaps exist within Commonwealth policy and management over development that may negatively impact the Commonwealth's marine ecosystem and the fishing communities. We appreciate the OMTF's attempts to bridge these gaps.

However, as a representative of the commercial fishing and seafood industry our attention is drawn to Recommendation #9. This recommendation proposes that "environmental agencies have the statutory authority to designate and protect areas that have special, sensitive, and/or unique estuarine and marine habitat life." We have grave concerns with this recommendation. It lacks a clear definition of habitat; and thus, represents a potential disruption in the current jurisdiction over fisheries management. To alleviate these concerns, the OMTF needs to clearly define the marine habitats it is looking to protect. We contend that the OMTF needs to define a precise line between marine habitats that are closely linked to commercial fishing and those that are tied to offshore or land-based development.

Without such specification, there is a potential for commercial fishing activity to be regulated by an agency other than the Commonwealth's Division of Marine Fisheries (DMF).

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Such an action is unacceptable. DMF should have exclusive authority over the regulation of commercial fishing in state waters. Thus, any habitat decisions that would affect the regulation or management of fishing activity should reside under DMF. DMF has the jurisdiction and expertise to manage fishing activities and this authority should be preserved.

Rather than introducing an additional agency into the fold, the OMTF should concentrate on coordinating efforts between agencies in the current system. Furthermore, the OMTF recommendations must recognize that existing state and federal law mandate the protection of marine species and habitats. The only gap that exists is a clear and comprehensive process for permitting the extraction of non-renewable resources, and the placement of structures and the impacts they may have on the marine environment.

Greater funding is needed for existing authorities and the continuing development of sound management and protection practices consider the impact of mining activities and the placement of structures.

Both the Office of Coastal Zone Management and the Division of Marine Fisheries are severely undermanned and under funded agencies. Apparently, more money is needed not a new level of bureaucracy. We urge the Task force to concentrate on a strategy to adequately fund the CZM & DMF, and to enable them to do their jobs effectively.

Thank you for time and attention to this important matter.

Sincerely,



Jacqueline Odell
Executive Director