

February 13, 2004

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

Re: Draft Principles and Preliminary Recommendations of the Ocean Management Task Force

Dear Dr. Tierney:

I am writing on behalf of the Greater Boston Chamber of Commerce to offer comments on the Draft Principles and the Preliminary Recommendations issued by the Ocean Management Task Force in December, 2003. The Chamber is a member of the City of Boston's Municipal Harbor Plan Advisory Committee and has participated in the development of municipal harbor plans for South Boston and East Boston. We are concerned about the possibility of adding additional regulatory constraints for landside waterfront development, particularly changes to the fee structure or other aspects of the Chapter 91 program.

The Chamber strongly believes that well-planned waterfront development contributes to the economic vitality of Greater Boston and provides benefits to residents and visitors alike. Such development attracts new businesses, creates construction and permanent jobs, increases local and state tax revenues, and harnesses private investment to provide valuable public waterfront facilities and amenities.

Waterfront development is already subject to an array of state statutes, regulations, and policies, including Chapter 91, MEPA, the Wetlands Protection Act, and Coastal Zone Management Program policies, all of which provide considerable protection for waterfront environmental resources. The extensive approval process that projects must undergo, however, increases the already high cost of waterfront development and often discourages developers from moving forward with plans. During a period of strong economic growth in Greater Boston, development has been minimal in the areas covered by the recently enacted South Boston and East Harbor plans.

We are concerned that changes to the Chapter 91 program or the fee structure for waterfront development would lengthen the permitting process for these projects, causing uncertainty in the development community and leading to fewer project proposals. In addition, we believe that such changes would increase the costs and risks of beneficial economic activity, and delay tax benefits, jobs and facilities of public accommodation for the public at large. Therefore, we encourage the Task Force to revise the Draft Principles to avoid any changes that would increase the costs and time required for waterfront development.

Sincerely,

Jim Klocke
Executive Vice President