



Massachusetts Aquaculture Association

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The Massachusetts Aquaculture Association Re: Massachusetts Ocean Management Plan.
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An Ocean Management Plan being implemented by the State of Massachusetts has been undergoing its first phase of action through the planning process. MAA feels that the aquaculture industry has been overlooked as a major stakeholder of the action plan when the Ocean Advisory Commission and the Ocean Science Advisory Council were formed without aquaculture representation on either.

In a conference call by MAA to Coastal Zone Management received by Prassede Vella, Ocean Management Analyst. Stephen Wright, Dale Leavitt, Sean Bowen and Bob Tourigny, MAA expressed the following responses.

When asked, how the planning process for the OMP (Ocean Management Plan) affects our constituency and industry: The plan already encompasses 50 or more existing shellfish aquaculture grants in Wellfleet and Eastham and more than 75 acres of proposed area in Nantucket and Vineyard Sounds. These farms already encompassed in the Management Area, represent more than \$1 Million in annual landed value of oysters and clams. The OMP is affecting aquaculture as an existing user group and industry in the planning area. The plan adds an additional review process to an already complex aquaculture permitting process that involves, Federal, State and Local government agencies. This increased layer of bureaucracy will increase the fees to establish and do business within the planning area. The plan may also limit the accessibility to potential growing areas, especially as new technologies and economically culture able species come to fruition in the industry to be raised offshore in the planning area.

The most critical and important issues the OMP addresses are: Flexibility for permitting and site selection of future projects and offshore endeavors. That the projects maintain economic benefits, allowance for multi-use and must consider aquaculture as sustainable industry. Aquaculture projects must be given equal footing in review and consideration in planning area as other user groups are.

Potential beneficial outcomes from OMP would include: Clarification and establishment of aquaculture's role in ocean management. Aquaculture gaining an equal footing as other users in management plan.

What are the questions and concerns about the planning process, how might they be addressed: Questions and concerns are the increased layer of bureaucracy, potential limiting accessibility, being subsumed by fisheries and the non-inclusion and failure to acknowledge aquaculture in the advisory process through the Ocean Advisory Commission and Ocean Science Advisory Council. These might be alleviated by inviting aquaculture to a seat at the table in the planning and review processes.

The Massachusetts Ocean Partnership (MOP) and the MA Coastal Zone Management Office (CZM) needs to recognize aquaculture as an existing user group and industry in the planning area for developing policy in the Ocean Management Plan and a potential future major industry within management area.

Additionally, fees associated with the review and permitting process of proposed projects in the OMP should be managed in a manner that would allocate a percent of the total fee to any user group organization currently an inhabitant industry in the Management Area.

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