



February 23, 2009

George Stafford  
Executive Director, The New York Ocean and Great Lakes Ecosystem Conservation Council  
Division of Coastal Resources, New York Department of State  
99 Washington Ave., Suite 1010  
Albany, NY 12231-0001

Dear Mr. Stafford,

The New York Marine Sciences Consortium (NYMSC) congratulates the New York State Ocean and Great Lakes Ecosystem Conservation Council on completing the draft Ecosystem Based Management Plan for New York State. We thank you for your extensive effort. Overall, we endorse the recommendations in the report but we believe it needs to be strengthened substantially in several important respects.

Our primary suggestion is that the final council report more strongly stress that we must improve our knowledge of how ecosystems function. We applaud the Council for articulating that management must be guided by the “best available science,” but believe the report should better emphasize that our current understanding of ecosystem science is incomplete. Baseline data and continuing research are vital if New York State is to have the evaluation tools and models it needs to fully implement EBM.

Only by documenting how ecosystems change over time can we understand and predict the impacts of anthropogenic and climate change. Therefore we believe that the report should advocate for the establishment of a research and monitoring fund along with a strong commitment to maintain such a fund over the long term. It is important to emphasize that the investment in research and monitoring must be ongoing if we are to keep New York State at the forefront of implementing and sustaining EBM. We would like to see several potential funding mechanisms identified in the report.

We also believe the report should explicitly encourage continued support for EBM pilot projects and modeling studies that are already underway in ecosystems where extensive historical data exists, such as Great South Bay, Long Island Sound, and the Great Lakes.

We endorse the research agenda in the Scientific Advisory Group (SAG) report and we urge that its recommendations be implemented. Furthermore, we encourage the Council to establish a permanent version of the SAG. Over the long term, this will add credibility to the Council’s work and enhance efforts in New York State to further EBM research and to develop management techniques. The New York Marine Sciences Consortium would be happy to recommend individuals to nominate for service on this committee.

The Council’s report should strongly emphasize that the funds generated through fees for a marine fishing license should be devoted to marine issues and should go into a Marine Resources Account rather than into the state’s general fund. The NYMSC believes a major portion of this revenue should be set aside specifically for marine and estuarine research.

We believe the report should better articulate the need to establish strong partnerships with appropriate regional, state, and federal agencies. Such efforts can help leverage state funding opportunities for EBM initiatives and create cooperative networks that encourage complementary EBM efforts.

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Further, the plan should identify several bold and forward-looking endeavors that will be undertaken. For example, the plan should call for an aggressive, proactive approach to restoration of marine ecosystems. Regulatory reforms as proposed in the report are helpful but will not by themselves bring back our depleted fisheries, restore sea grass, or prevent harmful algal blooms. Let's show that the state is not resting on its laurels.

We thank you for providing the opportunity to comment on this important plan. We are pleased that NYMSC is identified as the organization responsible for holding the annual scientific conference and we offer our services as collaborators to help advance work on the research priorities in any way we can.

Sincerely yours,

Maureen Krause, Chairman of the NYMSC Board

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