



**NEW YORK STATE
ORNITHOLOGICAL ASSOCIATION, INC.**

For the Birders and Birds of the Empire State since 1948

Division of Coastal Resources and Waterfront Revitalization
New York State Department of State
41 State Street
Albany, New York

October 1, 2007

I am writing on behalf of our organization in regard to Public Notice - F-2007-0739(DA), proposing to authorize the use of personal watercraft (PWC) at the Jamaica Bay Unit of Gateway National Recreation Area. The NY State Ornithological Assoc. is the umbrella group for bird clubs and related organizations in the state with 45 member organizations and 650 individual members.

We are opposed to use of personal watercraft within Jamaica Bay. This area has been designated a Significant Coastal Fish and Wildlife Habitat by the New York Department of State—this agency--and as a Critical Environmental Area by the New York State Department of Environmental Conservation. Jamaica Bay has also been designated as one of three special natural waterfront areas by New York City's Department of City Planning, and is an Audubon Important Bird Area. It is recognized as a crucial migration stop for numerous species of shorebirds and waterbirds, as well as breeding habitat for several species.

All of these values depend on the waters and wetlands of the bay, which should receive the highest level of protection. Personal watercraft are incompatible with wildlife: they can reach shallow areas; the noise is disturbing to birds; the machines produce significant air and water pollution; and their wakes damage marsh vegetation and can flood low-lying nests.

Restrictions on use of these watercraft are likely to be violated, and little enforcement is available. They are promoted as high-speed, go-anywhere vessels and are used as such. To expose the birds and critical environment of Jamaica Bay to personal watercraft is not in keeping with the recognition the Department of State and others have given this area. Jamaica Bay is already stressed and threatened from a number of sources—certainly another danger should not be added to this fragile ecosystem.

We urge that the NY State Department of State deny use of personal watercraft in Jamaica Bay.

Sincerely,

Andrew Mason, President