



# NEW YORK STATE ORNITHOLOGICAL ASSOCIATION, INC.

*for the birds and birders of New York State since 1948*

Jason C. Smith  
NYSDEC 4th Floor  
47-40 21st Street  
Long Island City, NY 11415

August 29, 2014

Dear Mr. Smith:

I am writing on behalf of our organization in regard to the pending Draft Black Skimmer Conservation Management Plan. The NY State Ornithological Assoc. is the umbrella organization for the bird clubs and several Audubon chapters in the state, representing 42 member organizations and over 600 individual members.

We support your agency's efforts to improve the status of this special concern species. The plan provides a comprehensive overview of Black Skimmer natural history and past, present and anticipated future populations and distribution in NY State. Likewise, the challenges to the species are identified, including the relatively recent threat of climate change and associated flooding storms and sea level rise. We are pleased that the impacts of off-road vehicles and other human activities, as well as introduced predators such as feral cats are recognized in the plan. These threats extend to other shore-nesting species as well.

The plan lays out an ambitious goal of ten skimmer colonies in the state over a five year period, with a corresponding average of 550 nesting pairs annually. These goals may be counter-productive together, however. As the plan notes, smaller colonies, which would likely make up most of the increased nesting sites, have less productivity than larger colonies. These smaller colonies also have a lower likelihood of success over the long term. Efforts put into establishing new colonies may be better focused on a smaller number of higher quality sites that can be maintained, monitored and managed using what will likely be limited resources.

We also believe the plan is lacking in evaluation and consideration of the food resources available to Black Skimmers in proximity to colonies. The plan does mention hypoxia and resulting die off of marine species, however other water quality issues and threats to prey species exist. Management actions ensuring productive feeding areas in bays and marshes should be included in the conservation strategy.

On balance, we consider the plan to be a serious and responsible approach to maintaining and hopefully improving the presence of Black Skimmer as a breeding species in New York State.

Sincerely,

Andrew Mason, Conservation Chair  
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