

Rhode Island Natural History Survey Comments on SAC Review of RIEMC Report.
Provided by Dr. David W. Gregg, Executive Director

RINHS agrees with the general premise of the SAC's review, that fully coordinated, integrated, effective statewide monitoring is a long term goal that could be a decade away and we also agree with the proposition that methodical and practical steps need to be taken at every opportunity.

RINHS agrees with the SAC in saying that, for understandable, practical reasons and because of the short time table, the first year's enumeration of monitoring needs by EMC has tended to be "producer driven," whereas the needs of consumers of monitoring data need to be more systematically reviewed. This might be an opportunity to talk to a broader range of data consumers, including municipal officials, land trusts, etc. Each data need can be tied tightly to a management action best by the consumer of that data.

RINHS agrees with SAC that extensive processing or research publication of, or elaboration upon data should be no excuse for delaying interim public access to it in its raw form. This should be especially true of data collected in real time and data collected by public agencies or with public funds.

With regard to biological indices, RINHS agrees with SAC that more work needs to be done to understand the results of biological monitoring as they bear on water quality. However, while SAC took apparently variable results in cited biomonitoring studies as a reason to dismiss or de-emphasize the importance of biological monitoring, it did so without reference to any particular management use of the biological data. We envision at least some management needs, such as regional planning, for which a four point scale, the "least common denominator" of biological monitoring, might be satisfactory. Also, while biology may be a "lagging indicator," for the public the biology is often the most important expression of environmental condition, and for that reason alone it deserves priority consideration in any comprehensive monitoring plan, despite the difficulty of doing it.

RINHS agrees with SAC that land use monitoring needs much more attention. We would emphasize the need for this monitoring to be Bay watershed-wide, that is to include substantial areas of Massachusetts. Our supplemental monitoring proposal could be a basis for further discussion since it remains unclear to us, even after several additional meetings on the subject whether there is a realistic alternative currently under consideration.

RINHS remains concerned about the lack of comprehensive strategy for engaging with Massachusetts on a variety of questions including land use, but also nutrient inputs. Much discussion focuses on the Blackstone with only brief or dismissive mentions of the Taunton River and Mount Hope Bay, which drain an area of Mass. at least as large as the Blackstone.

RINHS continues to refine its state-wide invasives initiative using feedback from many sources, including SAC. We believe that planning by prioritizing high-risk species, as suggested by SAC, is a good idea, but that presumes there's some planning to start with, which there is not. We believe the need for statewide invasives monitoring and response planning should remain at the very highest priority level for funding. This type of planning can be done, will be cost effective, and is time sensitive.

RINHS agrees that better funding for the EMC process is critical if it is to achieve its goals. This includes funding for data management. RINHS already has substantial biological data handling capability, and given financial support would be able efficiently to provide capability to any agency or organization needing it.