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COMPTROLLER



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ALBANY, NEW YORK 12236

STATE OF NEW YORK
OFFICE OF THE STATE COMPTROLLER

July 1, 2020

Mr. Erik Kulleseid
Commissioner
Office of Parks, Recreation and Historic Preservation
625 Broadway
Albany, NY 12238

Re: Compliance With Navigation Law
Report 2019-S-59

Dear Commissioner Kulleseid:

Pursuant to the State Comptroller's authority as set forth in Article V, Section 1 of the State Constitution and Article II, Section 8 of the State Finance Law, we conducted an audit of the Office of Parks, Recreation and Historic Preservation (Parks) to determine if Parks is adequately monitoring and enforcing requirements to ensure boaters' safety and quality of life on State waters. The audit covered the period from January 1, 2017 through October 31, 2019.

Background

With its vast network of waterways, including more than 70,000 miles of rivers and streams and 7,600 freshwater lakes, ponds, and reservoirs, New York State is rich with opportunities for water recreation. The New York State Navigation Law outlines rules for boating and recreational activities on most of the State's navigable waters, including safety and quality-of-life components. For example, the Navigation Law imposes restrictions on engine noise; establishes requirements for on-board safety equipment (e.g., personal flotation devices, fire extinguishers); prohibits anyone from operating a boat while under the influence of drugs or alcohol (boating while intoxicated, or BWI); and, pursuant to the 2019 enactment of Brianna's Law, requires all motorized boat operators to pass a State-approved boating safety course.

Enforcement of the Navigation Law is a collaborative effort among various entities, including Parks, Department of Environmental Conservation, Division of State Police (State Police), and local law enforcement (e.g., counties and municipalities), with Parks having primary oversight and enforcement responsibilities. Parks' goal is to provide the public with a safe and enjoyable boating environment by developing safe boating habits through education combined with enforcement of the Navigation Law. Safety and education components are administered by Parks' Marine Services Bureau (Bureau), while Park Police is the law enforcement arm. Effective December 3, 2019, command and control of Park Police was transferred to the State Police. However, Parks remains the lead agency in oversight of the Navigation Law.

The Bureau is responsible for overseeing boating safety education, including ensuring that: motorized boat operators have received boating safety training and are certified pursuant to Brianna's Law requirements; boating safety training materials meet National Association of

State Boating Law Administrators (NASBLA) standards; and boating safety courses comply with State regulations for a ratio of 30 students per teacher. Park Police's areas of responsibility include search and rescue, arrests, investigations, and emergency services.

All entities that enforce the Navigation Law on State waters and either receive State aid or have a marine equipment agreement or lease with the Bureau are required to submit Navigation Activity Reports (Activity Reports) to Parks annually as a condition of receiving State aid or using the leased equipment. Law enforcement entities that do not receive State aid or lease equipment from the Bureau are not required to submit Activity Reports. Parks compiles data from these Activity Reports, as well as data from other sources, such as boating accident reports from local law enforcement and Department of Motor Vehicles registration reports, as the basis for its annual New York State Boating Recreational Report (Boating Report) – a detailed analysis identifying law enforcement activity (e.g., BWIs, arrests), boating accidents, fatalities, and injuries by waterway for the year. In tandem with data from past years, Parks uses the information to better understand and prevent recreational boating accidents and inform the public about recreational boating activity in the State.

According to the most recent Boating Report, for 2018:

- More than 438,000 powerboats were registered in the State, nearly 6,000 fewer than in 2017.
- 203 boating accidents were reported, accounting for 19 fatalities, down from 22 in 2017.
- While the number of fatalities decreased from 2017 to 2018, the number of accidents and injuries increased.

Results of Audit

Parks has developed and implemented controls to adequately monitor and enforce requirements for safety and quality of life on State waters in accordance with the Navigation Law. However, Parks could take additional steps to coordinate efforts with local law enforcement entities and improve the reliability of the data it reports. These additional measures could help to maximize the efficiency of State marine law enforcement resources and improve Parks' ability to use reported data to assess boating safety risks and proactively mitigate them.

Coordination of Law Enforcement Activity

Park Police has established and implemented controls to consistently communicate with and monitor its officers throughout the State. However, communication with overlapping law enforcement entities could be improved to ensure law enforcement resources are utilized in the most effective and efficient manner.

Parks' marine law enforcement patrol activity is directed and administered by a Regional Commanding Officer in 9 of Park Police's 11 zones (2 zones do not have marine law enforcement units). The nine zones work with Parks' central office to coordinate patrols, report enforcement activities, and manage various administrative functions. Additionally, Park Police uses a blotter system to track events such as complaints, accidents, and fatalities, and maintains a shared webpage that allows for the exchange of marine-related information across law enforcement entities.

However, Parks does not have a structured process for communicating and coordinating patrol activities between Park Police and other law enforcement entities, such as county sheriff's offices, with overlapping jurisdictions. While officials stated they are in contact with other law enforcement entities on patrol activities as needed, the process is generally ad hoc. Therefore, certain areas or waterways may be overpatrolled – unnecessarily expending valuable State resources – while other areas may be inadequately covered.

Our interviews with officials with marine law enforcement responsibilities from five counties (Hamilton, Rockland, Warren, Broome, and Schuyler) bear this out. Officials at each of these entities said they have a good working relationship with other marine law enforcement entities such as Park Police; however, they have sometimes experienced gaps in coverage or, alternatively, found multiple entities covering the same bodies of water at the same time. For example, officials at one county described a situation where two separate boating accidents involving fatalities occurred around the same time and, with the nearest other law enforcement entity hours away, it was difficult to efficiently respond to both events.

In response, Park Police officials stated they utilize their knowledge of overlapping entities and their resources when allocating Park Police resources to their zones, but could not provide procedural documentation to support their statement.

While Park Police does not have authority over other law enforcement entities, more structured communication and coordination among law enforcement entities could increase the efficiency and effectiveness of enforcement activities, allow better leveraging of resources by Parks and other enforcement entities, and ultimately make State waters safer. We also note that Park Police's shared webpage, while a valuable tool, currently does not report contact information for all participating law enforcement entities, which could inhibit law enforcement's responsiveness. Parks officials stated they will start including that information on the webpage.

Reliability of Boating Report Data

Given the purpose of Parks' Boating Report – to better understand why accidents happen and gain insights for preventing them – it is critical that the underlying data is accurate and complete. However, we found that Parks officials do not verify data submitted by local law enforcement on their Activity Reports, nor do they ensure that all entities consistently submit Activity Reports. As a result, the Boating Report is not complete and may not be entirely accurate – and the information may be less useful or misleading to the public regarding safety on State waters. While Parks also uses other sources of information, in addition to the Activity Reports, when compiling its annual Boating Report, inaccurate or incomplete information may distort Parks' ability to reliably assess accident data and develop preventive measures.

Parks does not require entities to support their Activity Report data and does not independently verify it for accuracy on a sample basis or otherwise. We visited three counties (Hamilton, Rockland, and Warren) that submitted an Activity Report to Parks in calendar years 2017 and 2018 to verify certain data reported, such as BWI incidents, total arrests, total vessel inspections, and searches and assists. However, we were unable to verify some or all of the reported numbers at each county because of the way they maintained documentation after reporting their data to Parks.

In addition, ten counties that operate marine patrols did not submit an Activity Report to Parks for inclusion in the 2017 and 2018 Boating Reports. Parks follows up with entities that are required to submit Activity Reports (because they receive State aid or lease equipment from

the Bureau). Parks does not follow up with other entities, even if they enforce Navigation Law on State waters. Not only might these missing Activity Reports skew the overall data in Parks' Boating Report, but entities may be missing out on funding that might otherwise be available to them.

In response, Parks officials stated they do not always know whether entities not submitting Activity Reports are performing marine law enforcement. Nevertheless, it is important that Parks be aware of localities that are performing marine law enforcement and that should be reporting, and follow up with them to ensure they submit reports.

Although Parks officials stated that they believe the impact of the potentially incomplete and inaccurate Activity Report information is nominal and would not impact their analysis of the overall data, they also indicated Parks will be making improvements to the process for collecting information from the Activity Reports.

Oversight of Boating Safety Education and Public Vessel Inspections

Parks has established adequate controls over the issuance of boating safety certificates as well as public vessel inspections. Prior to issuing certificates, Parks officials obtain and review tests from vendors who administer boating safety classes and ensure that materials used for the training meet NASBLA standards. Also, Parks maintains a database of public vessels to ensure it conducts annual inspections. We reviewed records for 20 boating safety courses held during calendar years 2017 and 2018. For all 20 courses, the ratio of teachers to students generally met State requirements and Bureau staff maintained all required documentation for each test. Further, Bureau staff have begun preparing for an increase in testing needs resulting from the enactment of Brianna's Law.

We reviewed inspection reports for 82 public vessels for calendar years 2018 and 2019 and found inspectors did not pass vessels with serious deficiencies and completed and maintained all inspection documentation for 81 of the 82 vessels (Parks could not locate one inspection report).

Recommendations

1. Develop a structured process for coordinating marine law enforcement activity across waterways with shared jurisdictions.
2. Develop processes to improve the accuracy and completeness of Activity Reports, which may include:
 - Requesting Activity Reports from localities that do not submit Activity Reports if historical information supports that they conduct marine law enforcement; and
 - Obtaining, on a sample basis, supporting documentation for information reported on the Activity Report.

Audit Scope, Objective, and Methodology

The objective of this audit was to determine if Parks is adequately monitoring and enforcing requirements to ensure boaters' safety and quality of life on State waters. The audit covered the period from January 1, 2017 through October 31, 2019.

To accomplish our audit objective, we became familiar with and evaluated the adequacy of Parks' internal controls as they related to our audit objective. We interviewed officials from Parks and reviewed applicable laws and regulations as well as other documents related to Parks' oversight of the Navigation Law. We reviewed the calendar year 2018 Boating Report as well as the Activity Reports for 2017 and 2018 submitted to Parks by enforcement entities. Additionally, we judgmentally selected a sample of 3 of 47 counties that submitted Activity Reports for calendar year 2018 based on geographic proximity to Albany and those that reported high levels of enforcement hours. During our visits to these three counties, we interviewed officials to learn about their role in Navigation Law enforcement and to understand reporting and communication as related to our objective. We also contacted two additional counties to determine why they had not submitted Activity Reports and to obtain an understanding of their resources and communication with Parks officials in regard to our objective.

We selected a random sample of 40 of 399 public vessel inspections completed during 2018 and a second random sample of 42 of 424 public vessel inspections completed in 2019, for a total of 82 of 823 public vessel inspections, to determine whether the inspectors documented compliance with all inspection criteria and did not pass any vessels with serious deficiencies. We also reviewed a judgmental sample of 20 of 994 boating safety courses offered in calendar years 2017 and 2018 to verify completion of student record forms, student count, and student-teacher ratios. We judgmentally selected these courses based on the number of attendees. We determined the data sets were sufficiently accurate for the purpose of pulling our sample, but could not determine whether the data sets were complete. However, we did not rely on data and only used hard copy documentation for review of public vessel inspections and boating safety certificates. Results of our samples cannot be projected to the population as a whole.

We conducted our performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

Reporting Requirements

We provided a draft copy of this report to Parks officials for their review and comment. We considered their comments in preparing this final report and they are attached in their entirety at the end, along with our Comptroller's Comments. Officials generally agreed with our first recommendation, but took exception to the other. We have clarified our position in the attached Comptroller's Comments.

Within 180 days after the final release of this report, as required by Section 170 of the Executive Law, the Commissioner of the Office of Parks, Recreation and Historic Preservation shall report to the Governor, the State Comptroller, and the leaders of the Legislature and fiscal committees, advising what steps were taken to implement the recommendations contained herein, and if the recommendations were not implemented, the reasons why.

Major contributors to this report were Heather Pratt, Andrea LaBarge, Richard Podagrosi, Zachary Barach, and Erin Maloney.

We wish to thank the management and staff of the Office of Parks, Recreation and Historic Preservation for the courtesies and cooperation extended to our auditors during this audit.

Yours truly,

Brian Reilly, CFE, CGFM
Audit Director

cc: Laura Mason, Parks, Acting Director of Internal Audit

Agency Comments



Parks, Recreation and Historic Preservation

ANDREW M. CUOMO
Governor

ERIK KULLESEID
Commissioner

June 12, 2020
Mr. Brian Reilly
Audit Director
Office of the State Comptroller
110 State Street
Albany, NY 12236-0001

Re: Audit Draft Report 2019-S-59

Dear Mr. Reilly,

The Office of Parks, Recreation and Historic Preservation (OPRHP) has reviewed the Office of the State Comptroller's (OSC) draft report 2019-S-59 (Report), titled "Compliance With Navigation Law," which was conducted to determine if ORPHP is adequately monitoring and enforcing requirements to ensure boaters' safety and quality of life on State waters.

Based on our review of the Report, it appears that OSC is misinformed about OPRHP jurisdiction, and the roles and responsibilities of OPRHP's Marine Services Bureau and the New York State Park Police (NYSPP). As such, OPRHP provides the following additional background to assist in clarifying any misunderstandings and correcting inaccuracies in the Report.

Background on Roles and Responsibilities

Pursuant to Navigation Law § 30, the Commissioner of OPRHP has administrative jurisdiction over navigation on the navigable waters of the State and enforces the provisions of the Navigation Law. Through this authority, the Commissioner, on behalf of the State, may enter into an agreement with the United States Department of Homeland Security/United States Coast Guard to receive financial assistance to carry out a State Recreational Boating Safety Program (the Grant). As a component of the State Recreational Boating Safety Program, to receive the Grant the State agrees to "provide sufficient patrols and other activity to ensure adequate enforcement of the State's boating safety laws." The State meets this obligation by providing funding, equipment loans, and other support such as Marine Law Enforcement (MLE) training, to both State and local Law Enforcement Agencies (LEAs). These LEAs use these resources to patrol state waters to enforce provisions of the Navigation Law that pertain to recreational boating.

OPRHP, through its Marine Services Bureau, administers the federal and State funding to provide sufficient law enforcement coverage under both the federal Grant requirements and its requirements under Navigation Law § 30. The fact that provisions of the Navigation Law fall under the jurisdiction of OPRHP does not mean the NYSPP is the lead LEA for statewide enforcement of the Navigation Law nor does it authorize the NYSPP to command other LEAs to provide enforcement in their jurisdictions.

In addition to providing equipment to LEAs to undertake enforcement activities consistent with the Grant, OPRHP through its Marine Services Bureau, also provides State aid to eligible LEAs to enforce the Navigation Law pursuant to Navigation Law § 79-b. Section 79-b sets forth the eligibility requirements for LEAs to receive state funding for marine law enforcement. Section 79-b gives the Commissioner the authority to determine reasonable

and necessary expenditures that are eligible for reimbursement through the State Aid program. Like Navigation Law § 30, however, § 79-b does not give the Commissioner the authority to mandate, oversee or coordinate LEA marine law enforcement efforts as the Report concludes.

Absent explicit statutory authority to directly oversee law enforcement agencies, coordination between the NYSPP and another LEA is done on a voluntary, and not compulsory, basis. In this regard, the NYSPP role in marine law enforcement is no different than its role in other joint policing efforts. It coordinates with other LEAs when needed or when involved in official joint patrol efforts, including BWI/DWI statewide crack downs or texting and driving campaigns.

[Comment](#)

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We direct your attention to the following statements in the Report regarding the roles and responsibility of NYSPP and the Marine Service Bureau that warrant correction:

- New York State Park Police
 - OSC noted in the Report that, “Safety and education components are administered by Parks Marine Services Bureau, while Park Police is the law enforcement arm.”
 - The NYSPP is a law enforcement agency with statewide jurisdiction and constitutes the Division for Law Enforcement within OPRHP. The Marine Services Bureau works very closely with NYSPP and they, along with many other agencies, provide marine law enforcement throughout the State.
- Marine Services
 - The Marine Services Bureau oversees a State Recreational Boating Safety Program with a boating safety education program that includes as one component the provisions of Brianna’s Law; the Program is not “pursuant to Brianna’s Law requirements” as noted by the Report.
 - The Report notes that “All entities that enforce the Navigation Law on State waters are required to submit Navigation Activity Reports to Parks annually in order to receive funding for that year.” This statement is incorrect. The Marine Services Bureau requires any LEA receiving State aid to submit an Activity Report as a condition of receiving funding. Also, any LEA that has a “Marine Revocable Equipment Agreement/Lease” with the Marine Services Bureau is required to submit an annual Activity Report. However, aside from using the leased equipment, many of those LEAs are not eligible for and do not receive any funding from the Marine Services Bureau. Moreover, there are LEAs that enforce the Navigation Law on a sporadic basis but, for whatever reason, choose not to participate in any programs (i.e., Broome County). Those LEAs are not required to submit an Activity Report.
 - The data from the Activity Reports represents only a very small percentage of the overall data published in the Recreational Boating Report, and as the Report notes the Marine Services Bureau relies on other data for the Recreational Boating Report as noted below.

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We also noted some inaccuracies in the “Results of the Audit” section of the Report.

- The “Coordination of Law Enforcement Activity” section of the Report refers to the “Park Police’s shared webpage.” OSC may have intended to refer to the Officer Resource Page which the Marine Services Bureau maintains as a resource for LEAs and not for the general public.
- As stated before, Activity Report data comprises a very small part of what the Recreational Boating Report is based upon. Although some of the information collected from the Activity Report is referenced in the Recreational Boating Report, most of the Recreational Boating Report is based on information from Boating Accident Reports, DMV registration reports and statistical information filtered from our education database. As a result, this misunderstanding of what the Activity Reports are used for may have led to OSC’s incorrect conclusion that the Recreational

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Boating Report is not complete or accurate. Based on this misunderstanding of the data compiled to form the basis of the Recreational Boating Report, OSC's statement that the information less useful or misleading to the public regarding safety on State waters should be re-evaluated. The Recreational Boating Report accurately reflects general trends and statistical data available to the Marine Services Bureau. It is a useful reference tool to LEAs and the general boating public.

Comment

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- OSC's Report claims "10 counties that operate marine patrols did not submit an Activity Report for inclusion in the 2017 and 2018 Boating Reports." The data in the Activity Reports is not collected for the Recreational Boating Report. The data is primarily collected and used for the Marine Services Bureau's annual performance report, submitted to the U.S. Coast Guard. It is also unclear if OSC intended to say 10 per year or 10 per the two-year audit period regarding the number of counties that did not submit Activity Reports. In any case, it is believed that OSC intended to reference 10 agencies, not necessarily 10 counties. As previously explained some agencies that have marine patrols are not required to submit any reports to the Marine Services Bureau. OSC claims that "Parks doesn't follow up with counties on their missing Activity Report." OPRHP disagrees and states for the record that the Marine Services Bureau does follow up on unsubmitted Activity Reports when those entities are required to submit such reports. If a LEA is not required to subject an Activity Report, the Bureau does not seek such report.
- OPRHP agrees with OSC that it is important for the Agency to be aware of localities performing marine law enforcement. However, if these localities are not using or receiving resources from the State, there is no requirement that these LEAs submit an Activity Report and the Marine Services Bureau has no authority to "ensure" that they submit reports. The Marine Services Bureau can only request that they submit reports.

Comment

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Response to Recommendations

1. Recommendation: Develop a structured process for coordinating marine law enforcement activity across waterways with shared jurisdiction.

Response: As noted in the Draft Audit, NYSPP does not have statutory authority to direct the allocation of other State or local law enforcement resources. Accordingly, OPRHP disagrees with the Draft Audit characterization of the NYSPP as the lead agency for statewide enforcement of the Navigation Law which can develop a structured process to coordinate law enforcement activities across waterways with shared jurisdiction. Acknowledging this lack of authority yet recommending the NYSPP take action to coordinate marine law enforcement activities unreasonably suggests that the NYSPP are falling short of a duty that they do not have. Similar to its many other law enforcement activities the NYSPP participates in marine law enforcement functions with LEA partners.

- The NYSPP assist the Marine Services Bureau to facilitate multiple statewide marine education programs such as Safe Boater Courses and Marine Law Enforcement (MLE) schools each year. Its mission is "to provide quality boating safety and marine law enforcement patrols in those areas of the State determined to be in need of coverage." These patrols are established "whenever possible, in coordination with existing local, county and state marine patrol." The NYSPP conduct regular assessments and change patrol areas based on traffic volume/complaints received while coordinating with local LEAs. This coordination, which is not always accomplished using a written agreement, is paramount in completing its mission.

- The NYSPP also conduct larger joint marine law enforcement details where formal correspondence such as an Incident Action Plan is completed that outlines each agency's role during that specific enforcement campaign.
- One tool used by NYSPP and other LEAs is the Marine Law Enforcement Resource Page maintained by the Marine Services Bureau. This webpage link allows sharing of marine related reports and information. As a result of this audit, the Marine Services Bureau will implement and manage a Marine Law Enforcement contact list on this page. This will allow quick access to marine contacts throughout the State for all participating LEAs. NYSPP will establish a separate Marine LEA contact list compiled after the submission of each Zone's Marine Operational Plan. NYSPP Zones participating in Marine Law Enforcement are required to submit a Marine Operational Plan at the beginning of each summer season. This plan outlines their enforcement efforts for the season with scheduled events and patrols along with those coordinating LEAs. Each Zone will now be required to provide the most up to date contact information for their local marine law enforcement contacts.
- With regard to communication, the NYSPP is also connected through the mobile radio system which allows for communication with other LEAs by means of radio transmissions throughout the Zones. All NYSPP Marine patrols, when going in and out of service on a vessel, call in to their dispatch centers and advise that they will be on marine patrol and available should any marine related calls come in or emergencies arise.
- The New York State Park Police strive to build a mutually beneficial partnership with every participating LEA in the State. This is accomplished by maintaining an open communication line at the Zone level and Statewide. These working relationships have been fostered through interagency communication, mutual support, personal contacts and relationships built and passed down over the years. The NYSPP continue to support and communicate with their marine law enforcement partners, both in day to day patrols and marine operations, to ensure safe recreating and boating on all New York State waterways.

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2. Recommendation: Develop process to improve the accuracy and completeness of Activity Reports, which may include:
- Requesting Activity Reports from localities that do not submit Activity Reports if historical information supports that they conduct marine law enforcement; and
 - Obtaining, on a sample basis, supporting documentation for information reported on the Activity Report.

Response: The Marine Services Bureau will modify the Activity Report as follows:

- Include an instruction page with examples to better assist agencies in interpreting how to properly fill out the form. This would include when it is appropriate to use our recommended boarding report form.
- Separating out the Vehicle and Traffic (Registration) citations from the Navigation Law citations. This will provide a more reliable total number of actual Navigation Law citations by not including Registration violations. We will also make it clear that citations issued for violations of local laws are not to be included in the totals submitted.
- Add a line to record other Navigation Law citations; not just the primary ones already specified on the report. Part of this will be to modify the statement currently adjacent to

the totals blank which says that totals should reflect all tickets. Again, this will make the "totals" easier to tabulate and more accurate to interpret.

- Add a category that includes number of citations of local law related to speed on the water. Several municipalities are authorized to and have adopted local speed regulations pursuant to the Navigation Law.

Additionally, the Marine Services Bureau, upon learning of a marine law enforcement patrol that is active but has not submitted any Activity Reports to OPRHP, will request that they submit a report.

The Marine Services Bureau will randomly select 3 Activity Reports each year that will be reviewed with the submitting agency to verify the information submitted.

If you have any questions regarding our response, please contact Laura Mason, Acting Internal audit Director and liaison to external audit agencies. Mrs. Mason can be reached at (518) 474-0449 or via email at Laura.Mason@parks.ny.gov.

Sincerely,



Erik Kulleseid
Commissioner
Office of Parks, Recreation and Historic Preservation

State Comptroller's Comments

1. We acknowledge in the report that Park Police does not have authority over other law enforcement entities and nowhere in the report do we conclude that Parks has the authority to mandate or oversee other marine law enforcement entities. Rather, based on the weaknesses we identified in the report, we conclude that Parks could take additional steps to improve coordination with other law enforcement entities that have shared jurisdiction on State waters. These additional measures could help maximize the efficient use of State marine law enforcement resources.
2. We modified the final report based on the information in Parks' response.
3. We modified the final report to further clarify the requirements for submitting Activity Reports.
4. Our report states that the webpage allows for the exchange of marine-related information across law enforcement entities, not the general public.
5. We acknowledge in our report that Activity Reports are only one of multiple sources of information used to compile the annual Boating Report. However, we maintain that it is critical that Parks ensures the underlying Activity Report data used in the Boating Report is complete and accurate. Information that is not complete or not entirely accurate could mislead the public regarding the safety of State waters and may distort Parks' ability to reliably assess accident data and develop preventive measures.
6. Ten counties (not agencies) did not submit Activity Reports in both 2017 and 2018. We modified language in the final report to further clarify that Parks follows up only with entities that are required to submit Activity Reports, even though there are other entities enforcing the Navigation Law on State waters.
7. See Comment 1.