



Todd H. Waldron
Ruffed Grouse Society & American Woodcock Society
Northeast Forest Conservation Director

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Ian Crisman and Barbara Lucas
Bureau of Forest Resource Management
DEC Central Office
625 Broadway 5th Floor
Albany, NY 12233

Re: Strategic Plan for State Forest Management – Public Comments on 10 Year Draft Update

To: Ian Crisman and Barbara Lucas,

Thank you for offering us the opportunity to comment on NY DEC's draft updates to the Strategic Plan for State Forest Management. Established in 1961, the Ruffed Grouse Society (RGS) is North America's foremost conservation organization dedicated to creating healthy forests, abundant wildlife and promoting a conservation ethic. Together with the American Woodcock Society (established in 2014), RGS & AWS work with landowners and government agencies to develop critical wildlife habitat utilizing scientific management practices.

Overall, RGS & AWS applauds DEC's Bureau of Forest Resource Management's efforts to consider landscape level, ecosystem planning approaches that promote balanced forest conditions and a spectrum of forest age classes and conditions. We support a forest conservation framework such as this that simultaneously enhances forest resiliency, habitat diversity, outdoor recreation, circular economy, sustainable forest products and all the numerous co-benefits NY's state forests provide.

Our comments follow below:

Page 55: Existing Conditions: The Ecological Landscape Assessment section states: *"Analysis of the landscape using satellite-generated land cover from the 2016 National Land Cover Database (NLCD) cross walked to early successional habitat cover types including young forest, upland and wetland shrublands, and scrubby outcrops presently occupy between 1% and 6% of each ecoregion. Statewide, estimate is slightly over 2%. On State Forests the figure is 1-2% cover of these young forest, upland and wetland shrub, and outcrop habitats Ferree and Anderson, 2013)". "The most recent US Forest Service statistics are online at: <http://fiatools.fs.fed.us/fido/standardrpt.html>. This survey covered the period from 2003 to 2008, sampled all forest lands in New York State (including the Forest Preserve), and defined the forest by age classes instead of size classes. Under this metric, early successional habitat is best represented by forests ranging from zero to 19 years. Forests in this age range now represent 7% of the total forested acreage in New York State".*

RGS Comments - Note that the USFS FIA dataset from 2018 (Standard Reports Generator version 1.8.0.00 December 10, 2018) https://apps.fs.usda.gov/fia/datamart/datamart_excel.html for forests ranging from zero to 19 years reports that forests in this age range represent 3.3% of total forested acreage in New York State, a

53% decline over the past decade from the 7% reported in the 2003-2008 dataset.

Page 264-265: Forest Management states *“The acreage harvested during that same period varied widely, the highest area was 8,805 acres harvested in FY 2016-2017, and the lowest area was 5,471 acres harvested in FY 2010-2011. The average number of acres harvested per year was 6,842. This average is approximately 2-3% of the total forested acreage on public and private lands that receives some form of harvest each year.”*

RGS Comments – In terms of landscape level conditions and their impact on biodiversity and habitat, an average number of acres harvested per year of 6,842 acres over the 807,000-acre state forest system implies 0.8% annual forest treatments by acreage. If this trend continues over the long-term, we have concerns that the current estimated 1-2% early successional habitat cover will continue to decline as a percentage of total forest age class conditions, and that this will have detrimental impacts on biodiversity. This includes dozens of wildlife species listed in the State Wildlife Action Plan as Species of Greatest Conservation Need - Ruffed grouse, American woodcock, Golden-winged warblers and many more forest obligate species. Additionally, we think it would be helpful to report the number of acres harvested per year in relation to the allowable or planned acreage harvests across the system, rather than as a percentage of total forested acreage that receives some form of harvest each year which doesn't tie it to growth, or any forest sustainability benchmarks.

Page 265: Forest Management mentions *“The number of acres harvested in a given year is affected most by staffing levels and the occurrence of events that necessitate taking staff time away from the timber sale program. Current (as of early 2021), regional staffing levels show 44 Forester 1's, 3 Forestry Tech 3's, 14 Forestry Tech 1's (year-round seasonal staff), and 3 Contract Staffers. In addition, Central Office staff consist of 1 Forester 3, 1 Forester 2, 1 Environmental Program Specialist, and 1 Contract Staffer. The previously mentioned bump between FY 2015-2016 and FY 2017-2018 is a most likely a response to the short-lived Timber Sale Initiative program, which saw a temporary increase in forestry staff across the state”.*

RGS Comments – RGS & AWS supports increased staffing level capacity that would help the timber sale program meet DEC's annual and long-term management plan objectives, whether that is through additional FTE's or by adding Contract Staffers. As a key national and New York state conservation partner, we are willing to discuss options for financial and organizational support to DEC to help make this happen.

Page 268: Forest Management notes *“Comparing harvest rates to the net growth rate of the forest provides a valuable yardstick to measure sustainability. However, it must be recognized that sustainable management relies more on promotion of biodiversity, high-quality habitat, and forest resiliency than a simplistic approach of cutting below the net growth rate. Therefore, on a year-over-year or unit-level basis, removals may need to temporarily exceed the growth rate to create the desired future conditions or to respond to natural disasters and invasive outbreaks.”*

RGS Comments – We support DEC's approach here which considers the importance of biodiversity, high quality habitat and forest resiliency to the broader framework of sustainability, net growth, and allowable harvest levels. According to the DEC's website, New York's current State Wildlife Action Plan addresses no less than **537** "Species of Greatest Conservation Need (SGCN)" and the habitats they depend on for survival. Diminishing forest age class diversity and a decline in early successional habitat conditions are cited as key challenges to these species in need. Also, New York's 2015 Forest Action Plan Goal #2 (Keep New York Forests Healthy) specifically notes numerous



strategies that are related to biodiversity, habitat, and forest resiliency – including “foster diversity of native plants and animals in forests” and “boost forest regeneration and healthy forest structure” (NY DEC SFAP, p 4, 2015).

Finally, according to the Outdoor Industry Association, New York’s outdoor recreation economy generates 241,085 jobs, \$21 billion in total outdoor recreation value added, \$15.9 billion in wages and salaries, and 1.2% of GDP. Wildlife viewing, habitat, hunting, and angling are all important contributors. The National Woodland Owner Survey reports that 92% of New York landowners rate wildlife as highly important, important, and moderately important. New Yorkers care very deeply about wildlife and wildlife habitat and working toward balanced state and private land forest conditions across landscapes and ecoregions can help stabilize SCGN populations and recovery while simultaneously enhancing all the co-benefits that resilient forests provide to New Yorkers – recreation, open space, clean water, carbon storage and sequestration, sustainable forest goods and nature-based climate solutions.

Thank you for your efforts to ensure New York’s 807,000 acres of state forest lands remain resilient, healthy, and balanced for generations to come. RGS & AWS values our partnership with DEC and are actively looking for ways to support your efforts toward these outcomes.

Respectfully submitted,

Todd H. Waldron

Todd Waldron

Northeast Forest Conservation Director

Ruffed Grouse Society/American Woodcock Society

Email: toddw@ruffedgrousesociety.org

For more information visit the RGS & AWS website at RuffedGrouseSociety.org. Follow us on Facebook and Instagram @RuffedGrouseSociety.