



November 28, 2022

Regional Director Kelly Turturro
DEC Division of Lands and Forests – Region 3
21 South Putt Corners Rd.
New Paltz, NY 12561

Re: NY DEC East of Hudson Unit Management Plan - Public Comments

Dear Director Turturro and DEC Planning Team:

Thank you for offering us the opportunity to comment on DEC's Region 3 East of Hudson Unit Management Plan. 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. Our comments follow below.

Forest Resiliency & Habitat Diversity: Overall, RGS & AWS applauds DEC for your efforts to consider landscape level, ecosystem planning approaches that promote balanced forest conditions and a spectrum of forest age classes and conditions. We support DEC's approach which considers the importance of biodiversity, habitat diversity and forest resiliency within the broader framework of management objectives, recreational considerations, and ecosystem services. 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).

The EoH UMP *Summary of Ecoregion Assessments* states on pages 50-51:

“Fields/Shrub/Early successional: Current inventory shows approximately 4% in this cover type. Although the GAP analysis shows 2.2% (page 50), because of current habitat trends and work with groups looking to improve conditions for early successional species such as turkey, grouse, deer, New England cottontail and various bird species, this cover type will be actively managed for and improved upon. This can include well planned even aged forest management techniques, such as creating wide openings and wildlife clearings”.

The “Unit Vegetative Types and Stages” table on pages 20-21 indicates that there are “69 acres of natural forest hardwood in the 0-5” size class”. With 6,703 total acres designated in the UMP, this suggests that only 1.0% of the total UMP acreage is in the regenerating 0-5” forest age class. There is a much-needed habitat attribute associated with 0-5” forest stand conditions which complements old field and shrubland cover. Additionally, there are forest adaptation and resiliency benefits associated with diversifying age classes across the spectrum, from young forest conditions to older forest stands. We support DEC's efforts to diversify forest age classes and to work toward a landscape-level mosaic of forest habitat conditions that benefit Whitetail deer, New England cottontail, Golden-winged Warbler, Ruffed grouse, and several other bird & wildlife species.

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Our Northeast regional conservation staff has reviewed DEC's proposed schedule of even and uneven-aged silvicultural treatments across the various state forests within this UMP and we support these recommendations. If DEC experiences issues with insufficient staffing capacity, unfavorable market conditions or any other bottlenecks, we offer our support as a national and regional forest conservation partner to identify solutions and to increase the necessary capacity to achieve these outcomes.

Multi Use Trails, Access, and Recreation – California Hill State Forest: Page 73 of the EoH UMP states:

“California Hill State Forest is managed to accommodate multiple uses and no part of portion of the trail network can be designed to accommodate an exclusive use by a single user group. The Department assessed the unauthorized network and identified which trails could be brushed in to reduce the density of the trail network to disperse use across the property and make it more attractive to hikers and hunters. The unauthorized mountain biking network was evaluated, and suitable sections incorporated into a proposed nested large loop system that is approximately 7 miles long and will accommodate multiple user groups. Over the course of 2020 and 2021, remediation and marking of the trail network has been made possible through Volunteer Stewardship Agreement with the New York New Jersey Trail Conference”.

We stand with conservation partners like the New York Chapter of Backcountry Hunters and Anglers & others who have some remaining concerns about the trail network and would like to see DEC consider limiting general recreational access to this trail system during the big game firearm season. We are likewise available to work with the DEC Region 3 team and partners on this issue to accommodate the balance of multiple use recreation with hunting, habitat, and wildlife considerations. With its proximity to New York City and nearby Hudson Valley population centers, the East of Hudson Unit offers a critical and strategic opportunity for DEC's hunter recruitment programs. We're confident that by working together, we can help balance the multiple use amenities of this trail system and the overall safe and responsible enjoyment by all.

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 equitable access to the outdoors. Thank you for your efforts to ensure the public lands included in the East of Hudson Management Unit 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

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