

NATIONAL DEER ASSOCIATION

P.O. Box 162305 · Atlanta, Georgia 30321 · phone: 1-800-209-3337 · DEERASSOCIATION.com

4 March, 2021

Basil Seggos, Commissioner
New York State Department of Environmental Conservation
Young Forest Initiative
625 Broadway
Albany, NY 12233

RE: Strategic Plan for Forest Management on Wildlife Management Areas

Dear Commissioner Seggos,

On behalf of the National Deer Association (NDA), I am writing to provide our feedback on the NYSDEC Strategic Plan for Forest Management on Wildlife Management Areas (Plan). NDA is a national nonprofit wildlife conservation organization dedicated to ensuring the future of wild deer, wildlife habitat and hunting. We represent over 60,000 members nationwide and our membership includes hunters, landowners and natural resource professionals.

After reviewing the Plan, it is clear that the Plan is a well-thought-out document grounded by solid science, metrics and past and future outreach. The updated Plan provides a great synopsis of all the Young Forest Initiative has accomplished in its first five years (2015-2020) within New York and offers realistic insights as the program progresses. Although the goal of establishing 12,000 acres of young forest by 2025 has been extended to 2030, the foundation that was laid in first five years was substantial.

We appreciate the inclusion of deer as a target species for evaluating wildlife response to forest management, but we feel that expanded and more diverse survey and measurement techniques could provide more valuable information on the effects of forest management on deer response. We're hopeful that the large number of staff now dedicated to the program will allow for more robust looks at how the program impacts deer. The updated Plan proposes a plethora of new changes, and we support many of them, including keeping deer as a focal species in the program.

Other proposals that we support are the inclusion of uneven-aged management techniques, the bundling of forest management projects to facilitate timber sales, increased collaboration with partners and the potential to provide technical assistance to private landowners moving forward. We also appreciate the included strategy for training and professional development of dedicated staff. Finally, we support shifting focus from a percentage of young forest in individual Wildlife Management Areas (WMAs) to a percentage of young forest in WMAs within New York as a whole for the 12,000-acre goal. Shifting this focus will allow NYDEC to achieve more than 10% on some properties, which may be desirable. We do caution that this shift could, however, potentially hamper achieving the statewide goal in a well-distributed fashion.

There are some proposed changes that we oppose. Namely, a few milestones have been shifted or modified, and we fear that this may be a result to combat shortcomings realized in the first five years of the program. Specifically, the proposal redefines what a 'young forest' is. The previous plan defined a young forest as those stands in the 0-10 year age class, while the proposed Plan defines a young forest as stands that are 0-20 years. Based on Forest Inventory and Analysis (FIA) data, 0-20 years is the easiest way to define young forests, and doing so will include forests that were left out in the previous plan. Still, we

believe that this a great opportunity to improve outreach on young forests, including their definitions, and we believe that there is a better, or at least more specific, definition than simply 0-20 years. The new Plan also proposes to include shrubland and old fields into the definition of young forests, and we believe that inclusion of these landscapes will blur the lines of what constitutes a young forest and will make outreach efforts about their importance and how to manage them more difficult. We recommend defining 'young forest' based not only on vegetation age but also dependent on the composition of species present, if possible. For instance, a very young landscape (0-5 years) that's comprised of mostly annuals, grasses and limited woody species should not be included in the definition of 'young forest'.

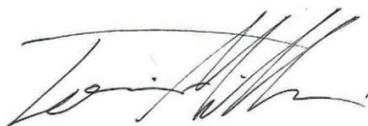
Finally, we believe that some additional changes could be made to further benefit New York's young forests and make implementation of the Plan more efficient and successful. We think the plan would benefit from including:

- The use of prescribed fire as an optional and recommended technique to reset succession, including outside of fire-dependent ecosystems such as pine barrens;
- A regional quota or goal of percent young forest based on needs (a risk-management approach) to make sure efforts are well-distributed across the state but also occur in places most in need of these habitat improvements;
- A percent canopy opening minimum (range) for Forest Management strategies of intermediate, mature and late successional forest components;
- A deeper discussion of deer harvest and its impacts, including collaboration with private landowner neighbors, timing of deer harvest and resulting cutting once the population has been reduced; and
- A more rigorous effort to assess forest regeneration response to deer over-browsing.

We also feel that NDA can play a helpful role in the Plan's strategy for training and professional development of dedicated staff through our Deer Steward program. For instance, we have provided customized in-person in-service trainings and/or promotional opportunities for enrollment in our existing online programming for nearly a dozen other state wildlife agencies. We also see the potential for a collaborative hire between NDA and NYDEC for technical assistance. We currently have several employees engaged in collaborative efforts with other state agencies, and this model has proven to be incredibly beneficial and effective.

Again, NDA applauds NYDEC on a thoughtful and comprehensive Strategic Plan for Forest Management on Wildlife Management Areas. The accomplishments achieved in the initiative's first five years (2015-2020) are substantial, and we are confident that the proposed Plan offers realistic goals and insights for future success. We look forward to helping the Young Forest Initiative in the years to come, and we are hopeful that some of our insights and recommendations are considered and implemented.

Respectfully,



Torin Miller
Director of Policy