

January 14, 2025

Brianna Denoncour, SWAP Coordinator
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625 Broadway, Albany, NY 12233
Comments submitted by email to nyswap2025@dec.ny.gov

Cc: Daniel Rosenblatt, Wildlife Diversity Section Head, daniel.rosenblatt@dec.ny.gov; Sue Booth-Binczik, Wildlife Biologist, Susan.Booth-Binczik@dec.ny.gov

Dear Ms. Denoncour:

Thank you for the continued opportunity to comment on the Department of Environmental Conservation's (DEC's) draft 2025 State Wildlife Action Plan (SWAP). The following comments supplement the suggested revisions of Species Status Assessments (SSAs) and extensive scientific information that our organizations submitted during the first SWAP comment period in June 2024.

We are greatly concerned about DEC's omission of SSAs for wolf, cougar, and lynx from the current comment period—a step that effectively deprives any newly engaged members of the public from learning from and commenting on these vital documents. Most concerning, the absence of draft SSAs indicates the possibility that DEC plans to exclude wolf, cougar, and lynx from listing as Species of Greatest Conservation Need (SGCN). Such a possibility is substantiated by DEC's statement on its State Wildlife Plan website that the current SGCN list “represents the species DEC is considering for inclusion in the SWAP.”

Exclusion of wolf, cougar, and lynx from the final SGCN list would be very unfortunate. As DEC is well aware, there is abundant scientific evidence of the importance of these top carnivores for biodiversity and ecosystem health—two of the critical goals that SWAPs can help advance. Much of the needed biological research to support recovery of wolves and cougars has already been done; additional studies would ascertain the prospects for lynx, a boreal cat, in a warming climate.

DEC has nothing to lose with an SGCN listing of wolf, cougar, and lynx, all of which are native species classified by New York State as either endangered or threatened. DEC would be keeping its options open, a necessary step should the agency wish to leverage federal funds for assessment and restoration efforts at any point in the next decade. We note that in the April 2024 draft SSAs, DEC stated that it is taking steps to determine the presence of wolves in New York and is open to cougar reintroduction in the future.

We look forward to continued communication with DEC about the 2025 SWAP in order to ensure that wolf, cougar, and lynx are on the final SGCN list and that the final SSAs reflect current science about the species and their contributions to ecological resilience.

Thank you for your time and attention.

Sincerely,

Adirondack Council: John Davis, Rewilding Advocate

Adirondack Wild, Friends of the Forest Preserve: David Gibson, Managing Partner

American Ecological Research Institute: Jay Tischendorf

Center for Biological Diversity: Tala DiBenedetto, Carnivore Conservation Staff Attorney

Cougar Rewilding Foundation: Christopher Spatz and Dave Furedy

Northeast Ecological Recovery Society: Joseph S. Butera, President & Co-founder

Northeast Wilderness Trust: Jon Leibowitz, President and CEO and Shelby Perry, Wildlands Ecology Director

Project Coyote: Renee Seacor, Carnivore Conservation Director

Protect the Adirondacks: Christopher Amato, Conservation Director and Counsel

Protect Our Wildlife (Vermont): Brenna Galdenzi, President & Co-founder

Rewilding Institute: Nadia Steinzor, Northeast Carnivore Advocate

Sierra Club Atlantic Chapter: Elizabeth Ahearn, Conservation Associate and Kate Bartholomew, Chapter Chair

Wildlands Network: Christine Laporte, Northern Appalachian-Acadian Director

Wolf CLAN Initiative: Dan Plumley, Director

Wolf Conservation Center: Joseph W. Hinton, PhD, Senior Research Scientist