



NEW YORK STATE ORNITHOLOGICAL ASSOCIATION, INC.

for the birds and birders of New York State since 1948

Joe Racette, NY State Department of Environmental Conservation
Albany, NY

July 15, 2015

Dear Mr. Racette:

I am writing on behalf our organization with comments on the draft 2015 State Wildlife Action Plan. NYSOA is the umbrella group for bird clubs and a number of Audubon chapters in NY State, representing 42 member organizations and over 600 individual members. One of our primary focuses is conservation and protection of the birds of the state, with particular concern for at-risk species.

We appreciate the effort DEC has put into updating the 2005 Comprehensive Wildlife Conservation Strategy. The high number of birds species found on the list of species of conservation need demonstrates that this group faces both short and long-term risks to populations in the state and beyond. These risks and populations are well-documented, through the efforts of agencies such as DEC, organizations such as ours and our member groups, as well as individuals.

We largely agree with the classification of bird species found in the plan. Certainly all those identified as high priority species of greatest conservation need belong there. Given the significant declines in populations of American Kestrel, Cerulean Warbler, Red-shouldered Hawk, and Common Loon, we believe these species should also receive high priority status.

In addition, the removal of Sharp-shinned Hawk from the SGCN list is premature, given its decades-long and continuing population decline.

Regarding threats identified in the plan, one significant omission is spent lead ammunition. This a well-documented cause of mortality in Bald and Golden Eagles and other scavenging species. The state's pathology database contains numerous records of death and injury to birds from ingesting lead, and these records are no doubt a small fraction of those occurrences. Both the threat of lead, as well as actions to reduce this danger, such as education of hunters and controls on lead ammunition should be included in the plan.

Although the plan does speak of utilizing DEC's policies and regulatory authority to benefit SGCNs, there is no specific mention of the agency's role in reviewing projects and activities that are identified as threats. These include energy projects, transportation projects, dams and water management, pollution, and solid waste, among others. DEC is frequently consulted or provides permits for these activities, but SGCNs rarely receive adequate attention from either the agency or developers. The plan should specify that avoiding threats to SGCNs during these

consultations and permits is a priority, and that in the case of high priority species, no activities that will have negative impacts will be permitted, and that recommendations against such activities should be the standard in these instances.

The section on implementation of conservation actions is the most lacking in this plan. It speaks only in generalizations of prioritization, cooperation, research, monitoring, etc., with no specifics for concrete actions to address the threats that are otherwise so clearly identified and justified in the plan. We realize that particular actions depend on planning, funding, and other factors, but this document is essentially truncated after making a strong case for action. It should at least include a call for a commitment by DEC and other responsible entities to act to implement the strategies necessary to protect and restore these species at high risk and importance in NY State.

We hope the final plan will reflect our recommendations and those of other organizations and individuals concerned with the well-being of all wildlife in the state.

Sincerely,

A handwritten signature in cursive script that reads "Andrew Mason".

Andrew Mason, Conservation Chair

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