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Peter Bauer *Executive Director* TO: NYS Department of Environmental Conservation FROM: Peter Bauer, Protect the Adirondacks RE: Draft 2015 New York State Wildlife Action Plan Date: July 14, 2015

While we applaud the Department of Environmental Conservation (DEC) for completion of the new Wildlife Action Plan, we're disappointed that the plan contains nothing about possible reintroductions of big carnivores, such as wolves and cougars, to the Adirondack Park and New York. The draft New York State Wildlife Action Plan lists 366 wildlife species in New York and states that 167 are species of "High Priority."

Extirpated Species: Protect the Adirondacks urges the DEC to study the reintroduction of wolves and cougars as part of its new Wildlife Action Plan. These carnivores once roamed far and wide across the Adirondacks and New York and the DEC should study the feasibility of their reintroduction.

The eastern gray wolf and cougars flourished across New York for centuries but were eliminated by hunting and bounties in the 19th century. While individual wolves and cougars have been documented periodically in the Adirondack Park, usually lone males from the Great Lakes states and Canada, there has not been a resident population for nearly 150 years.

We cannot rely on natural recolonization for cougars from the west. Aggressive hunting seasons are starting to reduce the overall populations and it's unrealistic to think that enough males and females will reach the Adirondacks to establish a viable population. New York leaders should take a hard look at reintroduction of cougars to the Adirondack Park.

Wolves are also highly unlikely to recolonize a viable breeding population in the Adirondacks. Given the tremendous success at reintroducing wolves to Yellow-stone national park, New York leaders should take a hard look at reintroduction of wolves to the Adirondack Park.

The Adirondack Park has long lacked top carnivores. While coyotes have helped to fill this void they do not replace these long absent top carnivores. New York's Wildlife Action Plan should evaluate habitat viability for these carnivores and make a full assessment about their conservation status and trends within the state, the northeast region, and beyond.

Protect the Adirondacks PO Box 769, Lake George, NY 12845 518.685.3088 www.protectadks.org info@protectadks.org Like Us on facebook **Separate Management Section for the Adirondack Park:** The Adirondack Park should be considered a separate, discrete entity for wildlife purposes!

Wildlife Corridors: Wildlife corridors should be instituted and enhanced between the Adirondack Park and the following areas a) Green Mountains of Vermon;t b) Tug Hill; c) Alqonquin Park in Otario; d) Laurentian Park in Quebec. This will provide for important gene flow which will be particularly crucial as climate change advances.

Elk Restoration: In 1990 DEC rejected the proposal of rhe Rocky Mountain Elk Foundation to reintroduce elk to the Adirondacks and Catskills after studies by Cornell and SUNY-ESF concluded that the project was both ecologically and economically feasible. The rejection appeared to be based primarily on the basis that the restoration would encourage the spread of CWD. There have been no confirmed cases of CWD in New York State deer for 10 years now. Elk ranged originally along river corridors and at lower elevations in the Adirondack Park and there is now ample CWD free elk available for reintroduction from Kentucky and Pennsylvania.