

September 19, 2025

Brianna Denoncour, SWAP Coordinator  
Division of Fish and Wildlife, NY State Department of Environmental Conservation  
625 Broadway, Albany, NY 12233  
*Comments submitted by email to [nyswap2025@dec.ny.gov](mailto:nyswap2025@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), including the current version dated July 2025.

As you are aware, throughout the SWAP development process, our organizations have recommended that DEC include wolf, cougar, and lynx on the list of Species of Greatest Conservation Need (SGCN). Extensive comments have provided DEC with comprehensive scientific information regarding the importance of these species to the health, recovery, and stability of New York's natural systems. DEC notes in the current draft SWAP (p. 7) that more than 500 individuals submitted comments on prior versions that primarily focused on these three large carnivore species (as well as several bird species).

It should therefore come as no surprise that **we strongly disagree with DEC's decision to classify wolf, cougar, and lynx as "Non-SGCN."** This position is stubbornly outdated and lax. DEC simply relies on the same argument and language that it put forth a decade ago in the 2015 SWAP: that the three carnivores are "extirpated" and therefore cannot be a conservation priority (p. 11). In taking this position, DEC is trying to turn back the clock on science, knowledge, and current realities regarding the ecological role and potential return of native wild carnivores to New York State.

DEC's decision to classify wolf, cougar, and lynx as Non-SGCN means that the public, advocates, and policymakers are deprived of updated Species Status Assessments (SSAs). In January 2025, 15 conservation organizations sent a letter to you and other DEC staff expressing concern over the removal from the SWAP process of SSAs that were drafted by the agency's own scientists to reflect current science, knowledge, and realities. **We strongly recommend that the SSAs on these species that DEC drafted in April 2024 be made publicly available again.**

In addition, **DEC's decision is glaringly out of step with other states in the Northeast.** Most notably, Vermont, New Hampshire, and Maine have included wolf as SGCN in their draft 2025 SWAPs because of the likelihood that wolves are already present or will be in the near future. This puts New York at a disadvantage in leveraging federal funds to assess and protect wolves and other wide-ranging carnivores that easily cross state borders.

**We reiterate our strong recommendation that before DEC finalizes the 2025 SWAP, the agency classifies wolf, cougar, and lynx as SGCN.** DEC staff are aware of the abundant scientific

evidence of how these top carnivores ensure ecological resilience. Much of the needed biological research to support recovery of wolves and cougars has already been done and additional study would ascertain the prospects for lynx, a boreal cat, in New York going forward.

Thank you for your time and attention.

Sincerely,

Nadia Steinzor, Carnivore Conservation Director, Project Coyote

Tara Thornton, Director of Institutional Engagement, Endangered Species Coalition

Christopher Amato, Conservation Director and Counsel, Protect the Adirondacks

Renee Seacor, Northeast Rewilding Director, Mighty Earth

Elizabeth Ahearn, Conservation Biologist, Sierra Club Atlantic Chapter

John Davis, Rewilding Advocate, Adirondack Council

Jason Kahn, Board President, The Rewilding Institute

Brenna Galdenzi, President & Co-founder, Protect Our Wildlife

Sarah Gorsline, Vermont representative and Multimedia Associate, Project Coyote

David Furedy, President Cougar Rewilding Foundation