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Via Email

August 7, 2026

James Hallworth
Senior Specialist, Forestry
Preferred by Nature
PO Box 1771
Chelsea, QC J9B 1A1
Canada

**RE: Eastwood Climate Smart Forestry Fund
Northway Forests, LLC
Cedar River Road, Town of Indian Lake, Hamilton County
Tax Parcel 64.-1-1.100
APA Project No.: 2025-0104**

Dear Mr. Hallworth:

Protect the Adirondacks ("PROTECT") respectfully submits this letter to report to you our concerns about clearcutting by Eastwood Climate Smart Forest Fund ("Eastwood"), to request an investigation into these events, and to request that Eastwood be required to cease any clearcutting activities on its properties in the Adirondack Park.

Eastwood/Northway Forests, LLC recently sought and obtained approval for timber harvesting activities—including 307 acres of clearcutting—on approximately 502 acres of land in the Town of Indian Lake, Hamilton County (the "Project"). The Project required a permit from the New York State Adirondack Park Agency ("APA") because, among other reasons, the Project meets the jurisdictional threshold for clearcutting set forth in 9 NYCRR § 573.7(b)¹. A copy of the APA permit is enclosed for your reference.

¹ APA's definition of clearcutting "means any cutting of trees over six inches in diameter at breast height over any 10-year cutting cycle where the average residual basal area of such trees after such cutting is less than 30 square feet per acre, measured within the area harvested." 9 NYCRR § 573.7(b).

The Project is Contrary to Representations Eastwood Made to SFI

The Project is directly at odds with representations made by Eastwood in response to Non-Conformance Reports (“NCR”s) issued by Sustainable Forestry Initiative (“SFI”) regarding its forest management practices. In 2022, Eastwood received an NCR for non-compliance with its SFI Objective 4: Conservation of Biological Diversity. In order to resolve this deficiency, Eastwood assured SFI auditors that its “harvest and renewal practices . . . leave[] significant residual stand structure on site . . .” SFI Forest Management Certification Reassessment Report (Aug. 22, 2024) (“SFI Report”) at 10-11; (emphasis added).² Based on this commitment, the NCR was formally closed.

However, Eastwood’s Project to clearcut hundreds of acres—notably, without the benefit of a comprehensive natural resources inventory—clearly contradicts its prior assurances. In fact, the application to APA for the Project permit states that “[t]he treatments . . . will require heavy cutting that will leave a residual stand with low stocking of stems >6 inches DBH in large areas, so an APA clearcutting permit will need to be approved for this prescription.” Eastwood describes a part of the prescription as a “clear cut removing/destroying as much . . . as possible”. This demonstrates that Eastwood did not intend to leave significant residual stand structure, as Eastwood previously represented to SFI.

The Project instead relies on heavy tree removal and will result in low post-harvest stocking, which is fundamentally inconsistent with the company’s commitment to maintain biodiversity through structural retention. Eastwood claims that the goal is to create conditions to regenerate a variety of northern hardwood species, but Eastwood also acknowledges that regenerating “hardwood stands has proven difficult in the central Adirondacks”. Despite this acknowledgement, Eastwood does not have a specific plan to conducting tree planting or seeding after the clearcutting operation is completed.

In addition, Eastwood received a separate NCR in 2022 for non-compliance with Objective 5: Management of Visual Quality and Recreational Benefits. To address this, Eastwood acknowledged that its lands in the Adirondacks are situated “in a region that is very heavily used by recreationists, residents, and tourists”, and that “[t]he Conservation Easement³ in place means lands are open to [the public for] hunting and other traditional recreational uses; hiking, snowmachine, biking on the many designated trail [sic].” SFI Report at 11. To resolve the NCR, Eastwood stated that “[a]ll units are partial cuts, ranging from individual tree selection to shelterwood to small patch cuts with retention.” Id. Yet the Project involves widespread clearcutting of hundreds of acres of land, without a full evaluation of potential visual or recreational impacts—again, in direct contradiction to the commitments made to SFI to preserve scenic quality and maintain recreational values on these publicly accessible lands.

² Available at https://sfidatabase.org/media/sfi/audits/Eastwood_Forests_LLC_SFI_FM_reassess_24.pdf.

³ The Conservation Easement is a large file but can be provided for your review.

The Climate Change Impacts of Clearcutting a Mature Forest Are Inconsistent with Eastwood’s Commitment to Promote Carbon Sequestration and Storage

When the Project site was acquired in 2024 by Eastwood it was touted “as the first property in the Climate Smart Forestry Fund” and a cornerstone of its strategy for advancing climate solutions.⁴ Eastwood consists of Sumitomo Forestry Company—a Japanese parent company of Eastwood—and nine other Japanese firms.⁵ Eastwood’s stated objectives are:

to increase forest sequestration of carbon dioxide, with a target of sequestering an additional 1 million tons of carbon dioxide a year. The increased sequestration will enable the production and trading of high-integrity carbon credits, which will contribute to the realization of a decarbonized society. The Fund will also enhance the value of forestland as natural capital by rehabilitating the role of forests in protecting biodiversity and water resources.⁶

Eastwood further claims its strategy “*will focus on producing high-integrity carbon credits through sustainable forest practices—practices that unlock the inherent functions of forests, including carbon sequestration and storage and in protecting biodiversity and water resources*”. (Emphasis added).⁷

These climate-focused goals are echoed in Eastwood’s public materials. On its website, Eastwood states that “*we manage forestland investments as nature-based solutions for long-term climate benefits which result in resilient forests*”. (Emphasis added).⁸ Upon acquiring the Project site in 2024, Eastwood proclaimed that the purchase “marks a significant step *toward Eastwood’s commitment to sustainable forest management and climate change mitigation*” and that it would “*continue to manage for resilient, long-term carbon sequestration and storage in the forest*.” Eastwood Forests Acquires Forest Land in New York (Feb. 2, 2024) (emphasis added).⁹

Despite these claims, the Project application to APA included no discussion whatsoever of the Project’s climate change impacts, including the loss of forest biomass from clearcutting that will reduce ongoing carbon sequestration; the release of stored carbon from soils and vegetation as a result of clearcutting; the inconsistency of widespread mature forest removal with long-term carbon storage goals; and the lack of any carbon accounting or climate modeling to assess the Project’s compatibility with the Fund’s carbon credit strategy.

In fact, the science is clear that clearcutting undermines carbon storage and sequestration by both reducing the amount of photosynthetic biomass capable of absorbing and storing carbon dioxide

⁴ Statement by Eastwood Forests LLC on acquisition of New York forest lands, available at <https://eastwoodforests.com>.

⁵ See Ten Japanese Companies Invest in Forestry Fund Sourced by Sumitomo Forestry Group (July 10, 2023), available at https://sfc.jp/english/news/pdf/20230710_01.pdf.

⁶ *Id.*

⁷ *Id.*

⁸ Available at <https://eastwoodforests.com/>.

⁹ Available at https://eastwoodforests.com/wp-content/uploads/2024/02/Eastwood-Forests-Northway-Press-Release_Feb-2024.pdf.

and by releasing significant volumes of stored carbon into the atmosphere.¹⁰ This result is completely incompatible with the claims by Eastwood and the Fund that their forest management practices will promote “long-term climate benefits” and enhance carbon sequestration.

Furthermore, the Project application failed to analyze or disclose the greenhouse gas (“GHG”) emissions associated with its timber harvesting activities. This omission is particularly striking given that Eastwood was issued an NCR in a recent SFI audit for failing to address GHG emissions in its operations. *See* SFI Report at 7 (noting that Eastwood has “no program to identify and address [GHG] emissions within their operational control”).

In sum, the proposed timber harvesting activities not only fail to align with the stated goals of the Fund and Eastwood to foster climate resilience and carbon storage, but also fail to comply with the legal obligations imposed by state climate policy. The APA must require the applicant to fully evaluate and disclose the Project’s climate impacts before taking further action on the permit.

Conclusion

In conclusion, the Project fails to uphold Eastwood’s obligations to SFI and it fails to meet Eastwood’s responsibilities to support, not undermine, New York’s climate and conservation goals. PROTECT respectfully urges Preferred by Nature to investigate our concerns about Eastwood’s Project. We request that Eastwood stop any clearcutting activities on properties in the Adirondack Park and that it be required to plant a variety of native trees the areas where it conducted clearcutting activities.

On behalf of the Board of Directors of PROTECT, please accept our gratitude for the opportunity to share our concerns about this Project.

Sincerely,

A handwritten signature in black ink that reads "Claudia K. Braymer". The script is cursive and fluid, with the first letters of each word being capitalized and prominent.

Claudia Braymer
Executive Director

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¹⁰ Lacroix, Emily M.; Petrenko, Chelsea L.; Friedland, Andrew J. Evidence for Losses From Strongly Bound SOM Pools After Clear Cutting in a Northern Hardwood Forest. *Soil Science*, April 2016