



Conservation Board

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3 April 2013

Mr. John Clancy
NYS Department of Environmental Conservation
1285 Fisher Avenue
Cortland, NY 13045-1090

Dear John,

I am very pleased to forward the accompanying document, containing comments on the NYSDEC Draft Twin Sheds Unit Management Plan (January 2013), representing the careful and thoughtful work of an *ad hoc* review committee of the Town of Dryden Conservation Board. The members of the *ad hoc* committee included Robert M. Beck (Chair), Bard V. Prentiss, and Dr. Milo E. Richmond, all of whom have been long-time residents of the Town of Dryden, very active members of the Dryden Conservation Board for a number of years, and actively involved in local and regional conservation efforts. A draft of these comments also was reviewed and discussed by the members of the Dryden Conservation Board in attendance at the Board's regularly scheduled monthly meeting on 26 March 2013. In addition to this e-mail correspondence, I also will be forwarding a paper copy via U.S. Mail later today.

We appreciate the opportunities you and other DEC employees have provided for public input and comments on the Draft Twin Sheds Unit Management Plan. I attended both of the information sessions at TC3, organized by you and your Staff for public comment and input. You did a fine job in introducing the plan initially and in sharing the results of the draft plan most recently.

From our Town Clerk, Bambi Avery, we learned recently that you will not be continuing in your current capacity with DEC. From my perspective, your departure will be a loss to the community. It has been a pleasure working with you over the years. Good luck in all your future endeavors.

Sincerely,

Charles R. Smith, Ph.D.
Chair, Town of Dryden Conservation Board

xc (via e-mail): Conservation Board Members
Bambi Avery, Town Clerk
Dan Kwasnowski, Director, Town of Dryden Planning Department
Mary Ann Sumner, Supervisor, Town of Dryden

Comments and Suggestions
From the Town of Dryden Conservation Board
For the NYSDEC Draft Twin Sheds Unit Management Plan of January 2013
Prepared by an *Ad Hoc* Review Committee:
Robert M. Beck (Chair), Bard V. Prentiss, and Dr. Milo E. Richmond

Following are comments and suggestions from the Town of Dryden Conservation Board for the **Draft Twin Sheds Unit Management Plan (January 2013)**, for possible improvement of an otherwise well conceived and well written forestland management plan. If there is some redundancy within these suggestions with the existing Twin Sheds Unit Plan, it should be considered as "ADDITIONAL EMPHASIS" to the several well-thought-out goals, objectives, and proposed actions already present in the document.

Overall Observations: We endorse listening carefully to the several users and private citizens who took the time to come to an open meeting and make their voices heard. We likewise endorse careful evaluation by the NYSDEC management professionals and authors who need to come down on the side of "custodian of perpetuation and health" of this remarkable and renewable common land resource.

Additional comments regarding the Twin Sheds Unit Management Plan:

- There clearly is a need for a forestry based management scheme that includes reasonable timber harvest rates in the face of insect and disease encroachment. A timber and fuel wood harvest will benefit both the economy and employment concerns in the upstate region. Likewise, the resulting open spaces, trails, uneven-aged stands, staging areas and roads will offer additional benefits to a large number of residents and wildlife that use the forests during all seasons.
- Wildlife concerns include management/control of a substantial deer herd that likely interferes with forest regeneration in many areas of the forest units. Consideration should be given to seeking special harvest regulations (liberalize!) for deer management. Longer seasons and a more liberal take, perhaps with obligatory doe harvest, as used recently in nearby management units, might be one answer.
- Overall efforts should be aimed towards reduction of deer and guard against invasion of feral hogs known to be nearby, and goats which potentially could show up and negatively impact the area. A liberalized and advertised deer harvest might be facilitated with camp areas that can be used during other seasons by non-hunters.
- Additional vernal pool creation in key areas for erosion control and amphibian habitat is desirable in several locations. If we build it they will come and use it. Kentucky has a wonderful program and brochure in this area of habitat manipulation. Existing research at Cornell's Arnot Forest provides positive demo sites.
- Maintain existing multiple use options as mentioned in the Unit Management Plan and continue harvest and management of the RENEWABLE resources. Include one or more

choice forested sites for absolute protection so that an older age stand (even post climax) can be observed by interested students and naturalists. Consider identifying one or more of the largest of the species of trees that can be observed by visitors. A kiosk with information could highlight this.

- Have a more comprehensive plan for major blowdown or ice damage that includes a thoughtful, wholistic approach to salvage, vs. leave alone, vs. reforestation through replanting. Recall that even a rotting log provides a microcosm of valuable habitat and cover for a variety of organisms, all of which are of value in the larger scheme of biodiversity.
- Clear cut larger areas for early succession species and increased diversity of wildlife. The diversity will include numerous prey species with a following increase in predators for both birds and mammals.
- Open further options to fuel wood harvest in select areas that are gentle slopes, but perhaps poor tree nursery sites. These could become frequently managed locations that would be used by early succession species.
- Consideration might be given to creation of uneven-aged plots in the pattern of a "demonstration site" near a well-traveled road. These could be labeled as to age, general composition and ecological status/value. Such plots could enhance visitor understanding of successional ecology while providing a habitat mosaic for a wider variety of species.
- MAPS, pp. 122-144 (pp. 123-127 are missing): All maps are easy to read with direct labels, clear legends, scale notation, suitable contrast, Northing symbol, and neatline. Both content and context are well displayed. Excellent maps overall.
- Map reference: Map credits (creator/developer) should be clarified. For example, does J.M.C. suggest derived from JIMAPCO, the commercially available mapping series? Or, does J.M.C. signify Clancy, John M. (2011) NYSDEC Div. of Lands and Forests, Cortland NY?
- Goal 4, Sound Stewardship: Action 4.6. 1 & 2. Substantial effort should be made to acquire thru purchase or easement as much of the land-locked parcels of private land as well as private property surrounded on three sides by State Forest Lands. The NY State Open Space Plan should guide these acquisitions as suggested on p. 76. A conservation easement allowing Trail #1 to continue across private land is imperative.
- The UMP Glossary of terms is useful and appears complete. However the sources cited (pp. 111-113) far exceed those referenced by LETTER as being used in glossary development. It is not a significant error however, to list additional sources if you consulted them.

- Goal 1, pp.48-65, reads well and demonstrates significant concern for maintaining a healthy and diverse forest community in what was historically a huge forested ecosystem. Maintenance of the health and renewable features of these two units will be difficult in the face of invasive species, harmful insects, disease, multiple and somewhat competing uses, as well as harvesting and age management of the forest. We suggest that the KEY to success is both VIGILANCE and an ADAPTIVE MANAGEMENT strategy that will signal the need to alter plans as dictated by existing conditions, current science, and best management practices. The public should be enlisted and educated to help in this effort. And, the NYSDEC should embrace as much public input and support as possible in keeping these Twin Sheds Forests healthy and renewable.
- Because violent weather and exotic insect pests are a reality in this region, a more specific plan/strategy may be necessary to address adequately management needs following ice and/or blow-down events. A planned preemptive harvest ahead of insect or disease losses may be called for as an adaptive action. We did not find such issues as this addressed in the Unit Plan. (Action 3.1.2).
- Goal 2. Outdoor recreational opportunities. All objectives and actions identified in this section (pp.65-70) seem reasonable and seek to protect both the options for multiple use as well as protecting the forest and its perceived values.
- The objectives and proposed actions mimic many of the recommendations that our Conservation Board suggested in putting together a list of outdoor activities that we wish to promote through the Town of Dryden Recreation Program. We likely will continue to promote such activities as we work with others to develop our Town Open Space Plan.
- We particularly applaud multiple use trails, snowmobile trails, buffer zones along trails, an easement or purchase of private land to expand trail use, (Action 2.2.9), kiosk placement and handicapped access. A prime view shed location with access for all visitors/users would be a valuable addition.
- Agreements with timber and fuel wood buyers could provide the labor and equipment to accomplish much of this if it were written into sales contracts. The price of wood just may have to creep up to realize this possibility.
- Goal 3. Benefits, economics and aesthetics. (Action 3.2.1) Prohibit surface disturbance that may be associated with hydraulic fracturing. In fact, our Town of Dryden Conservation Board has supported the notion of disallowing this activity in the efforts to obtain natural gas. Such disturbance, including well pads, roads, pipelines and heavy vehicle traffic would run counter to nearly all other worthy goals of the Twin Sheds Unit Management Plan. This matter is currently under court appeal.
- Action 3.2.2: We, the Conservation Board, likewise advise against any major surface

mining efforts, with the exception of shale harvest, from any of the eight existing pits where the material would be used on and for the benefit of enhancing use and improvement of trails and parking areas.

- At this time we do not favor Action 3.2.3, which allows for oil and gas exploration and the associated well pads, risk to the water resources, and associated fish and wildlife populations. Likewise, we do not favor additional roads and pipelines and the disturbance to wildlife and plants implicit in their construction and use for these particular harvest operations. In addition, both roads and pipelines contribute to habitat fragmentation and are therefore in direct conflict with the underlying goals of the plan. The Twin Sheds are a public resource and a highly treasured common land possession. They already provide enormous renewable resources and are a cornerstone for other resources (air, water, soil, and aesthetics) in this region.
- Objective 3.1.1: Forest Management, Economics (p. 70). Action 3.1.1. Management and sale of timber and fuel wood appears well planned. We would suggest that careful oversight be given to these activities and that every effort be made to firm up arrangements for harvest practices that will also yield roads, trails, parking areas, and needed enhancement of public benefits as the resources are harvested. A log staging area can easily be situated for development into a suitable parking lot with a desirable view shed if the right deal can be made. These activities can logically be included in an adaptive management plan, which we think is a progressive approach to getting the work accomplished.
- We do endorse continuing harvest efforts, and recognize their value to the timber industry and overall economics. Likewise, harvest creates regeneration and brings an area of the canopy close to the ground where it is heavily utilized by a plethora of insects, amphibians, reptiles, birds, and mammals. Numerous species benefit from the uneven successional stages that are created. Lessons learned on the Connecticut Hill Wildlife Management Area over the past 50 years are valuable and applicable throughout this upstate region and can be helpful in making decisions.
- Finally, our Conservation Board and the residents of our area view the Twin Sheds as well as other terrestrial and aquatic habitats and geological features in the Town of Dryden as being important and valuable to our Town and the surrounding region. Moreover, we are receptive to any opportunities for partnering with the NYSDEC in the further protection and wise management of these shared resources.