



April 7th, 2026

Honorable Jen Lundsford  
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Honorable Rachel May  
Senator  
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cc: Assembly Encon committee chair: GlickD@nyassembly.gov  
Sen May LD: kmwillia@nysenate.gov

Dear Assembly member Lundsford and Senator May:

The New York Forest Owners Association has concerns with A. 10483/S. 4408 which would authorize agreements, such as leases or easements, related to renewable energy development on State Reforestation Areas. We understand that an amended bill, S.4408A has been introduced into the Senate and a, same as, revised bill into the Assembly, that clarifies that the proposed actions relate just to transmission lines and accompanying corridors. However, these amended bills still raise some concerns with the legislative purposes of the Environmental Conservation Law (ECL) Articles 9-0501 through 9-0507 and may conflict with recommendations adopted in the Scoping Plan by the Climate Action Council as established by the 2019 Climate Leadership & Community Protection Act (CLCPA).

The New York Forest Owners Association (NYFOA) represents private family forest owners who hold 14 million acres of forests and woodlands across New York State. While we are primarily concerned with actions that affect private sustainable forest management, we actively advocate for the sustainable use and management of all forests and woodlands in our State.

The woods, forests, and open spaces across New York State cover almost 65 percent of the land in the State (19 million acres). Over 200,000 private owners hold 75 percent of New York's forests. An additional 500,000 private owners have very small patches of woods ranging in size from 1 to 10 acres. The remaining publicly held lands include approximately one million acres of State Forests (many of which were originally called State Reforestation Areas) and 4 million acres of Forest Preserve in the Adirondacks and Catskills. All New York's forests and woodlands contribute greatly to the economy and healthy environment that all New Yorkers enjoy, and provide essential needs: wood products, food supplies, wildlife habitat, watershed retention values, recreation opportunities, carbon sequestration, and others. New York's forests produce \$10 billion of wood products annually, provide safe water supply for 16 million people,

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support an outdoor recreation economy of \$3.8 billion, contain essential wildlife habitat, biodiversity and vital oxygen-producing and carbon sink areas to ameliorate climate change. Timber harvesting and the wood products industry support employment of over 40,000 New York citizens - especially in our rural areas where job opportunities are scarce. Sustainably managed forests and woodlands sequester greenhouse gases, helping to combat global warming. Our forests are the “lungs of our State.”

The State Reforestation areas are located across the State outside the Adirondack and Catskill Parks. They were acquired under various legislation (starting with the Hewitt Amendment Act of 1931, Land and Water Conservation Act after World War II, etc.) and were always to be for forest-related uses. Most have active management programs for sustainable timber harvests, development of recreation trails for all types of users, wildlife habitat improvement, and watershed protection. Many State Forests receive heavy public use.

We understand the need for electric transmission lines and that sometimes they must cross forest and woodland areas for efficient conveyance of power. However, the conversion of vital forest land to nonforest transmission-line corridors should be minimal. The CLCPA Scoping Plan recommends that there should be “No Net Loss of Forests” when forests (public or private) are threatened with conversion to other land uses (e.g., residential, commercial, and industrial development, solar or wind generation, and transmission rights of way). The following principles should apply:

- To the extent possible, avoid impacting forests,
- for impacts on forests that cannot be avoided, minimize the loss of forests, and
- for impacts on forests that cannot be avoided or minimized, mitigate the loss of impacted forests.

To mitigate the loss of forest land to transmission-line corridors, the bill should require that additional forest land be acquired in an environmentally and financially appropriate process. Such acquisition to be negotiated on a case-by-case basis depending on local conditions and alternative ways to secure offsets. As an example, consider a 50-foot right-of-way. Extended to a mile, roughly 6 acres of forest are removed. Note that 50 feet is a conservative estimate and depends in part on the voltage being carried. Doubling the width to 100 feet results in 12 acres per mile of right-of-way.

NYFOA recommends not enacting these bills (A.10483A/S.4408A) as currently written. We, and other organizations, stand ready to assist your staff in crafting a bill that will keep State Reforestation Areas in healthy and productive forest-related use, and have no net loss of vital forest land, while still enabling necessary transmission lines. Please contact us for further assistance.

Edward Neuhauser  
President NYFOA

Hugh Canham, Chair  
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