



## MEMORANDUM OF OPPOSITION

### **S4408 / A10483**

Renewable energy development rights on state reforestation lands

POSITION	STATUS	ASK
<b>Oppose as written</b>	Passed Senate; in Assembly Environmental Conservation	<b>Vote NO unless substantially amended</b>
State reforestation lands were set aside to grow forests, protect habitat and watersheds, and provide public access for hunting, fishing, trapping, and other outdoor recreation. S4408/A10483 opens the door to for renewable energy infrastructure on those lands without clear, enforceable limits on access loss, habitat fragmentation, or long-term land conversion.		

#### **Why oppose S4408 / A10483 as written**

- **It puts wildlife habitat and public access at risk.** Roads, corridors, clearing, fencing, and long-term occupancy will fragment habitat, disrupt wildlife movement, and reduce the public-land experience even where access is not formally closed.
- **It sets the wrong precedent.** State reforestation lands were acquired and intended for wildlife and habitat conservation as well as outdoor recreation to allow all New Yorkers to enjoy the great outdoors, not as a standing inventory for industrial siting.
- **It is too broad.** The bill authorizes leases or easements for renewable energy siting, connectivity, and related electric infrastructure on state reforestation lands, but does not create clear statutory limits on where, how much, or what kind of development may occur.

#### **If the Legislature continues this discussion, at minimum any future bill should:**

- Prohibit any net loss of public access for hunting, fishing, trapping, and general outdoor recreation
- Prohibit permanent habitat fragmentation inconsistent with the land's acquired purpose
- Require parcel-specific review, public transparency, and clear findings before any agreement is approved
- Prioritize already disturbed and degraded areas, not reforestation lands intended for wildlife and habitat conservation

