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NYSDEC Bureau of Wildlife  
Swan Management Plan  
625 Broadway  
Albany, NY 12233-4754

We write to express our opposition to the revised March 2015 “Management Plan for Mute Swans in New York,” currently being considered by the Department of Environmental Conservation (DEC) regarding the mute swan population.

Last year, the DEC’s original Management Plan was met with significant opposition statewide. After review of the original plan, it appeared that any threat from New York’s mute swan populations was largely speculative; the swan populations in our entire State are very small, totaling only 2,200 in three regional populations on Long Island, the Hudson Valley and Lake Ontario. The Long Island and Hudson Valley populations are currently either steady or in decline, and the Lake Ontario population numbers less than 200.

In response to the original Management Plan, and out of concern about the seemingly speculative nature of the proposal and an overreliance on lethal management measures, the Legislature passed a bill that would have required the DEC to fully document the scientific basis for the management plan. In addition, the legislation would have required increased public involvement, including at least two hearings in areas with swan populations, a comment period of not less than 45 days and the inclusion within the plan of a response to all substantive public comment.

The revised Management Plan appears to disregard the Legislature’s key requests—that of full documentation of the scientific basis for management decisions, future mute swan population projections and environmental damage (both current and projected) and less reliance on lethal management measures.

The DEC has failed to provide compelling scientific information as to why such an aggressive management strategy is being pursued. While the mute swan is an introduced species, the specific threats cited in the revised Management Plan are not supported with scientific evidence. For example, the report makes a number of distinctions between mute swans and other waterfowl but fails to provide the scientific basis for those distinctions. “As natural foods become scarce, mute swans will readily accept handouts whereas other waterfowl are not so adaptable. (p.3)” In another case, the evidence cited includes “many video clips on the internet (p.3).” Since the distinctions between mute swans and other waterfowl serve as the primary basis of the management strategy, they should be buttressed by scientific information.

In cases where information is provided it is often outdated or overstated. For example, the statement “Swan feces contain especially high levels of fecal coliform bacteria, so the presence of large flocks at certain times could impair the use of waters for drinking, swimming or shell fishing” is justified by a single study conducted almost forty years ago that included only 44 birds (some of which were Canada geese). In addition, the purpose of the study was to determine whether waterfowl contributed more fecal coliform than fecal streptococci.

We agree with the hunters who expressed concern about the expansion of waterfowl hunting to include mute swans, as indicated in management point 3.3 of the Revised Plan, and believe that such an expansion is unacceptable. It is also troubling that the Revised Plan fails to reference statutory constraints and instead appears to suggest that such hunting would be governed only by regulation indicating “Hunting would not occur where local ordinances prohibit the discharge of firearms for public safety such as New York City or urban parks where mute swans are kept pursuant to a DEC permit or license.”

The revised Management Plan also constructs a complex, confusing and likely unworkable system of partnering with local municipalities to “possess” and control swans in parks.

In some areas of the state, particularly downstate, the annual courtship of mute swans, their nesting and cygnet-rearing are eagerly-awaited events. In spring, photographs of mute swans and their young cover the front pages of local newspapers. Unlike most other animal species, the activities of mute swans are open for all to see. In fact, observation of this very visible species is a rare portal into the world of nature for many New York families, especially children whose connection with the natural world is critical to the future stewardship of our natural environment.

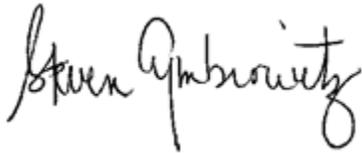
The Management Plan’s goals are to reduce the swan population to 800. However, the true logical extension of this revised plan meets the same end as the original plan, eventual eradication of the mute swan with a transitional phase where the public will witness the swans’ transformation into much reduced animal, maimed to be flightless and sitting on nest eggs that never hatch.

In closing, without full documentation of the scientific basis of the actual damage to the environment or other species caused by mute swans, any management plan will be ineffective and the threat from their population will remain unsubstantiated. The revised Management Plan should be put on hold until such time that meaningful documentation of the scientific basis for the proposed actions is presented and the overreliance on lethal measures removed.

Very truly yours,



Steve Englebright, Chairman  
Assembly Environmental Conservation Committee



Steven Cymbrowitz  
Member of Assembly