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Re. Draft Unit Management Plan for Hemlock-Canadice State Forest

Mr. John Gibbs, NYS DEC Region 8 Forester  
7291 Coon Road  
Bath, NY 14810

Mr. Gibbs:

Thank you for the massive amount of work that went into creating the draft Unit Management Plan for the new Hemlock-Canadice State Forest. Though much is ably covered in the plan, I do have comments and serious concerns. Many of my concerns are the very same communicated to you (letter of November 8, 2010) when the UMP process for Hemlock-Canadice was beginning.

The draft plan lacks topographic data. Looking at the maps provided, one might almost think the forest is flat. There is one fleeting reference to slopes in the text on pg. 28, "Access is also limited by terrain." Actually, access is primarily limited by terrain.

The draft plan makes numerous references to the lack of access (pp. 16, 28, 40, 46, 48, 56 and 96) to forest land. I presume they mean motorized access since the areas they mention are completely accessible on foot. Providing topographic information would demonstrate that the most inaccessible areas are inaccessible because of steep slopes.

The Unit Management Plan should respect existing steep slopes by indicating their class, location, and the difficulties with meeting water quality standards while attempting to install infrastructure on steep slopes.

Different classes of steep slopes require different management practices. Though soil maps are provided with the plan, the slope classifications that accompany these soil designations in the Livingston and Ontario County Soil Surveys have been removed. Providing the basic categories of slope (0-8%, 8-15%, 15-25%, 25-40% and 40%+) would indicate which proposed stands could be harvested with the least danger to water quality.

Even within a "multiple use plan", some uses take precedence, for example public drinking water. This forest management plan is actually little more than a timber harvest plan. Pg. 40 of the draft plan invokes an 84 year old statute stating that the "production of forest products" is the principal purpose of State Forests. On page 61, the draft plan states that "The primary method used to influence the timber and vegetation on State land is the commercial sale of timber." Much has changed in 84 years. The draft plan admits that unique conditions exist in the Hemlock-Canadice State Forest, especially as a source of public drinking water, but ignores that unique condition in its management recommendations.

Public drinking is the highest and best use of the lakes' waters, and protection of the watershed, especially the H-C State Forest, will prove to be the cheapest and most effective method of securing high quality drinking water. The draft plan states, "Protecting water quality continues as

the most important function of this property,"(pg. 4) and yet the plan does far too little to protect water quality.

Seeking to provide motorized access to steeply sloping land (over 15%) for whatever purpose, including gas drilling, tower construction, and timber harvest, will inevitably compromise the water quality goals of this plan.

I ask again that the Hemlock-Canadice State Forest be designated as a State Historic and Nature Preserve in order to protect those values that make it truly unique among State lands.

Sincerely,

Stephen Lewandowski