

Submitted to:
NYS DEC
Region 8
7291 Coon Road
Bath, NY 14810

Regarding the Hemlock-Canadice Unit Management Plan (UMP):

I enjoy Hemlock Lake water both at my Henrietta residence and at most of the businesses and venues I frequent throughout the City of Rochester and towns from Brighton to Victor. Being my ubiquitous source of water, that makes me at least 60% Hemlock Lake water by weight!

The citizens and leaders of Rochester have invested and worked diligently for over 100 years to protect this source of drinking water by **preserving the upland forest, preventing development, and strictly limiting usage** – to the point of requiring those launching a canoe to keep their bare feet out of the water. When the City of Rochester had an opportunity to transfer their lands to the state, this sale had broad citizen support, including my support, because we believed that the New York State would have even a better authority & resources to protect these drinking water reservoirs – reservoirs which provide drinking water to several towns in Ontario County and Livingston County, 38% of the drinking water in Monroe County, and almost of the City of Rochester. Hemlock & Canadice Lakes are the only two Finger Lakes undeveloped lakes, with the undeveloped banks and upland forests natural filtration capability resulting in some of the best drinking water in the world by keeping out docks, buildings, erosion from development, and runoff of chemicals or fertilizers.

The draft UMP is insufficient to continue to protect these lakes primarily as pristine drinking water reservoirs.

I urge the NYS DEC to **designate the Hemlock-Canadice lands as a “Unique Area” or “State Nature and Forest Preserve”** because the “State Forest” designation does not adequately protect the primary purpose of these lakes – invaluable sources of very high-quality fresh drinking water for a region of over 1 million people. The drinking water of New York City is largely protected on a watershed basis with most of that watershed being protected in the New York State Constitution as New York Forest Preserve. Why should our citizens in Monroe, Livingston and Ontario County, who have meticulously protected this drinking water source, deserve less protection?

I am concerned that the draft UMP and the “State Forest” designation are insufficient to protect our drinking water source for a number of reasons, including:

1. Over and over, the UMP (pages 15-17, 46-47 and 97-101) indicates the possibility of allowing **mining, drilling and even hydraulic fracturing** for oil, gas and other resources. Even if it is unlikely that mining and drilling would be approved, **those activities should be completely and explicitly banned** from these lands, as both the nutrient loading from the erosion of building the infrastructure and the risk of leaking and spilling hazardous chemicals, heavy metals and radiation, would harm the water quality irreparably. The Syracuse and New York City drinking water lakes, streams and aquifers will be protected by a ban on hydraulic fracturing. Our city and region deserves the same protection.
2. Over and over, the UMP (pages 16, 28, 40, 46, 48, 56 and 96) indicates the need for better access to support logging operations and other opportunities. The trees surrounding the lakes are providing a very economical filtration process. Logging revenue is not one of the purposes of those lands. **Logging should be explicitly stated to be done only to protect or improve the quality of the water**, not to

generate income, local industry, nor even to increase quantity of water quickly entering the lakes with reduced filtration time.

3. The NYS Division of Water (DOW) states that it uses a watershed management approach to guide decisions, because what happens in one part of a watershed affects the rest of the watershed. I call upon you to apply the wisdom of that policy and **apply a watershed management approach to protecting these waters**. The draft UMP focuses on the lands as a parcel of lands, and fails to address these lands as part of a watershed, effectively resulting in segmentation from the rest of the watershed which extends to Steuben County, and even from the treatment plant, town park and parking area on the outlet shores of the Hemlock Lake. As part of a watershed management approach, I call upon the NYS DEC and the NYS DOW to **explicitly ban hydraulic fracturing and similar activities from the entire Hemlock-Canadice Lake watershed as part of its watershed management**, even if it is beyond the scope of this UMP.
4. I see no reference to Environmental Justice (EJ), nor application of NYS DEC Policy 29 in this draft UMP document. It appears that **Environmental Justice Policy 29 needs to be explicitly applied to this plan** because these lakes supply the essential element of life, drinking water, to **nearly all of the areas identified as EJ areas in both Livingston and Monroe Counties** by NYS DEC EJ maps (<http://www.dec.ny.gov/public/899.html>). These are areas in which a significant percentage of the population are minority groups and/or below the federal poverty level. These are neighborhoods and regions with concentrations of vulnerable populations who probably will never have the luxury of hiking or fishing at beautiful Hemlock Lake, who don't have the luxury of the time or resources to drive out to Springwater to voice their opinions about protecting their drinking water, but who would be extremely harmed if the quality of their water declined or the price increased. Environmental Justice Policy needs be part of all decisions about this land. The current draft UMP, which will be used to make decisions, thoroughly addresses the needs for recreation, logging and mining – but does not mention the need its largest percentage of its water customers – poor and vulnerable populations. We have seen in Detroit, Michigan, a city on the shores of a Lake Erie, what happens when the consumer water prices jumped in the last 10 years – an estimated 70,000 poor & vulnerable customers could not pay their bills (including backlogged bills for water leaked from delivery pipes before it reached their homes), had their water shut off, and in some homes had their children taken away by social services due to the lack of running water in the home.

Let us do the right thing for current and future populations, and change the designation of these lands, ban activities which put at risk the water quality, address Environmental Justice Policy 29, and to continue to protect these lakes primarily as the pristine drinking water reservoirs that they are.

Respectfully submitted by:

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