



September 19, 2016

Re: HI Tor WMA Habitat Management Plan

Michael Palermo, Biologist 1 and Scott Smith, Biologist 1
Young Forest Initiative
NYS Department of Environmental Conservation Region 8
6274 E. Avon-Lima Road
Avon, NY 14414

Dear Sirs:

The Canandaigua Lake Watershed Association is a thousand member, non-profit organization whose purpose is to protect the water quality and overall environment of the Canandaigua Lake watershed for future generations by applying scientific research, advocating sound public policy, and offering educational programs to the community.

We have reviewed the Habitat Management Plan for the 6,832 acre Hi Tor Wildlife Management Area for 2016-2025 and attended the Public Information session in Naples on September 8, 2016. As a result of our review, we have the following comments on the plan.

We understand that the Young Forest Initiative is being applied to all State Forests and WMAs. As such, great care must be exercised to be certain that specific applications to specific lands do not lead to unintended, negative consequences. We would submit that the management of the 6,832 acres of Hi Tor, which is entirely in the Canandaigua Lake watershed, has major impacts on the watershed and lake. The forests and wetlands of Hi Tor directly impact water quality in tributary streams Clark Gully, the West River, Lower Naples Creek, Parish (Conklin) Gully, and Tannery Creek. Sedimentation poses a threat to sensitive cold water fish species, such as rainbow trout, which spawn in Naples Creek.

At present, most of the impacts are positive, but we are concerned about management changes, especially those which entail more logging. We are sorry not to see a specific water quality goal among the key habitat management goals (pg. 3). We share with you concerns about invasive species (pg.4) but we view limiting the amount of disturbance of the forest cover as a more practical means of combating invasive species than remedial pesticide applications (pp. 21 and 22).

The plan gives highest priority to the establishment of young forests as a means of providing additional habitat for several species such as ruffed grouse and woodcock but does a poor job of establishing a

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context for this action in the privately managed forests surrounding Hi Tor. We observe sufficient abandonment of farmland and logging of private forests in the area to provide habitat for these species. As far as we understand your plans for management of wetlands within Hi Tor (pp. 30-32), we are generally in agreement with them. Potential changes in the routing of runoff from the West River and Naples Creek through these wetlands owned by New York State, the Finger Lakes Land Trust and The Nature Conservancy could enhance their function to clean water. We are aware of similar proposals to enhance wetlands at the south ends of Owasco and Honeoye Lakes so as to improve water quality in those lakes. Fully a third of the drainage to Canandaigua Lake enters through Naples Creek/West River. Though we will need to see details of this proposal, we would generally be in favor.

Under Forest Management Objectives (pg. 11) we want to draw your attention to items 1-3. We are concerned about the means of establishing and maintaining the young forests category. Again, though young forest may currently be limited in Hi Tor, it is certainly present on adjacent private lands. On item 2, when you state that “mature forest is abundant on the WMA,” we are aware that there may be differences of opinion as to what constitutes a “mature forest.” We see on pg.12, the statement that “many forest stands at Hi Tor...have reached maturity and are declining in productivity,” and presume you are only crediting productivity of wood. Mature forests produce more than wood. On balance, CLWA favors the retention of more mature forests in Hi Tor WMA. Our reason for this is that timber prices will fluctuate, private property ownership will change, and typical forest management practices will change, but we see a future that will include a continuing need for high quality drinking water and increasing interest in outdoor recreation that may favor more mature forests. On item 3, we are in agreement with you about the need to retain as much oak/hickory forest as possible in Hi Tor, but it is our opinion that the principal obstacle to this goal is the high whitetail deer population of the area. Existing oak/hickory forests of Hi Tor developed at a time (90-110 years ago) when whitetailed deer were absent from the forest. Oak/hickory forests won't regenerate in Hi Tor unless deer populations are lowered or they are excluded from certain stands (pg. 22).

The 4,534 acres of forests in Hi Tor have been mapped and described in considerable detail. However, missing in this document is any consideration of slopes. This lack of information on slopes concerns us greatly, since we have been focused in recent years on protection of the steep slopes of the watershed. The Towns of Middlesex and South Bristol have enacted laws regulating, and restricting, the development of steep slopes (over 15%). The *2014 Comprehensive Update of the Canandaigua Lake Watershed Management Plan* as reviewed and approved by the NYS Department of State recommends “improved regulatory protection for steep slopes... and wetlands...to protect steep slopes and water courses” (pg. 60). We strongly feel that timber harvest plans should contain information about slopes and recognition that harvests on steep slopes will require greater attention to erosion-control features.

On pg. 15, two harvests in 2015 were described. We favor the thinning (with or without harvest) of plantations of softwoods to allow regeneration of hardwoods. But we have viewed the 66 acre cut and found the sheer amount of mud, rutting, and trampled vegetation to be of concern. Bulldozers and heavy equipment operating in the forest remove more than trees; the protective duff is also impacted. We expect heavy soil losses from this cut over a period of years until vegetative growth is re-established. Studies we have seen of current timber harvest practices in experimental forests of the Northeast bears out this conclusion. The *2014 Comprehensive Update of the Canandaigua Lake Watershed Plan* contains a Forestry section (pg. 111) that details measures to “minimize soil erosion from timber harvest operations” and “encourage active partnerships between municipalities and forestry professionals.”

We cannot agree with you on Objective One (pg. 18) that “maintaining at least 10% young forest will be accomplished through the application of even-aged management throughout WMA forested stands in perpetuity.”

We share your concern about the impact of Hemlock woolly adelgid on the hemlocks of Clark, Parish (Conklin), Tannery and other gullies. The absence of this “foundation” specie will lead to habitat change in the gullies, warmer creek water, increased sedimentation, and the possible further loss of valuable species such as Brook Trout (in Tannery). We hope that biocontrols for HWA will become available and used in the near future.

We have reviewed your rationale for management of shrubland (pg.23), grassland (pg. 25), and agricultural land (pg. 28) within Hi Tor. Because of our concern with water quality, we urge you to consider all alternatives to herbicide treatments and to choose select application strategies that will minimize the use of herbicides (pp. 22-28).

We are sure that you understand the dynamic and complex interaction of Canandaigua Lake levels and the function of wetlands in the Naples Creek and West River sections of Hi Tor (pg. 31). The City of Canandaigua’s role in regulating lake levels was established by an act of the State Legislature in 1887 and has been re-visited each time a municipal withdrawal has been permitted. Target lake levels (Guide Curve) were established in the mid-1970s after historic flooding from Hurricane Agnes. The Guide Curve acknowledges both the natural fluctuations of climate and the multiple, and sometimes conflicting, uses of the lake. Our understanding is that the 1.6 foot fluctuation in the Guide Curve between summer and winter levels alleviates normal spring flooding and represents less than half of the normal seasonal fluctuation present in the unregulated Finger Lakes.

We share your concern about the presence of invasive species in Hi Tor’s wetlands. Your management plan, however, seems to overlook the biocontrols available and under development for some species of concern, such as purple loosestrife, Eurasian milfoil and water chestnut, that are already established in the wetlands. We highly favor the use of biocontrols and mechanical treatments over the application of pesticides in the wetlands.

To summarize, we welcome your plans to add to the Hi Tor Wildlife Management Area, such as the recent acquisition of Parish Gully land. We have assisted the Finger Lakes Land Trust in such acquisitions. We support your plans to increase the biodiversity of the Hi Tor WMA. We ask that greater attention be given in both this plan and in the UMP to the protection of water quality. Immediately downstream of Hi Tor WMA, over \$1 billion of lake real estate and 60,000 municipal water drinkers rely on high quality water. We look to you for the exemplary land management, so influential with private landowners, which will protect our environment.

Sincerely,



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