



**LAKE • GEORGE
WATERKEEPER®**

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January 20, 2009

Mr. Chris Hunsinger, Chairman
Town of Queensbury Planning Board
742 Bay Road
Queensbury, NY 12804

Re: General Timber – Bloody Pond Road (265-1-28)
Site Plan 50-2008

Dear Mr. Hunsinger:

The Lake George Waterkeeper has reviewed the above referenced site plan application and would like to offer the following comments for consideration by the Board:

1. There is concern about timber harvesting access on the steep slopes of French Mountain.

The logging roads to be used surrounding the steepest section of this property have not been identified. Although the NYS Forestry BMP's guidelines are included in the application (as recommended at the 12/16/08 Planning Board meeting), details have not been submitted on the logging roads. Significant damage can be produced by "logging" road construction on steep sites. Because the details are not yet submitted, the same questions previously asked still apply.

- Has a sketch plan been prepared to locate the roads/trails on these sections?
- Will roads and trails be restored after construction?

2. The Waterkeeper is concerned about the protection of the existing streams and wetlands.

Buffers, initially proposed at 20 ft on either side of the stream (per a Warren County Soil and Water Conservation District (WCSWCD) recommendation) have been increased to 35 ft. Although this mitigation is positive, a larger buffer with a minimum of 50 ft on either side would be more protective of the streams and minimize the impacts of timber harvesting on this property. The Lake George Park Commission's new proposed Stream Corridor Protection regulations require a 100 ft buffer on either side. This proposed distance has been based on scientific data. Again, this distance is beneficial for water quality within the watershed, but when steep slopes are added to the equation, additional distance should be applied. Some of the proposed timber harvesting property appears to have slopes in excess of 50%.



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3. A buffer should be required on the ridgelines that dip into the ‘canyon’ (where a stream flows below).


Although it was stated that no equipment would drive into the canyon area, the trees that are on those very steep hillsides and protecting ridges should remain untouched, as part of the stream’s buffer.

4. A coordinated review should occur between the Town of Lake George and Queensbury.

This would include a coordinated effort to continuously inspect the operation to ensure that logging roads are sufficiently monitored for erosion and stormwater impacts and that the proposed NYS BMP’s are followed appropriately.

Thank you for your thorough discussion of this timber harvest application. Although the Waterkeeper supports sustainable timber harvesting, a good portion of the property in the Town of Queensbury has extremely steep slopes, and attention to the long term affects of removing vegetation on these slopes requires care. The Lake George Waterkeeper looks forward to working with the Town of Queensbury Planning Board in defending the natural resources of Lake George and its watershed.

Sincerely,



Kathleen S Lindberg Bozony
Natural Resource Specialist / Lake George Waterkeeper

cc: Brian Grisi – Adirondack Park Agency
Michael White – Lake George Park Commission