



Cayuga Lake Watershed Intermunicipal Organization

Intermunicipal cooperation to protect the watershed

November 22, 2022

Donald Zelazny
Great Lakes Programs Coordinator
NYSDEC – Great Lakes Program
700 Delaware Avenue
Buffalo, NY 14209
Via email: greatlakes@dec.ny.gov

RE: Comments on the Draft New York's Great Lakes Action Agenda 2030

Dear Mr. Zelazny,

The Cayuga Lake Watershed Intermunicipal Organization (CWIO) applauds the NYS Department of Environmental Conservation – Great Lakes Program for developing a watershed plan covering such a large geographic area. We recognize that there are many voices to consider, and we want to ensure the Finger Lakes are part of the conversation in the outreach and implementation of the Great Lakes Action Agenda.

The Cayuga Lake Watershed Intermunicipal Organization (CWIO) brings watershed municipalities together to work collectively and collaboratively on monitoring, protecting, and restoring the health of the watershed. CWIO works with municipally appointed representatives to identify water quality threats, recommend actions and strategies to address these threats, secure funding for recommended actions, support educational initiatives, and advocate for legislative changes at all government levels to protect and preserve the watershed.

To advance our shared goals, CWIO submits the following comments on the Great Lakes Action Agenda:

Connection to the Finger Lakes

Environmental Conservation Law Article 14 – New York Ocean and Great Lakes Ecosystem Conservation Act is the driving force behind the development of the GLAA but that only addresses Great Lakes coastal areas. We request emphasizing the importance of the Finger Lakes when considering the Great Lakes watershed.

The draft document mentions a Finger Lakes Action Agenda, and we are aware that document is not available for review at this time. We encourage the authors of the Finger Lakes Action Agenda to connect strategies, benefits, and metrics with the Great Lakes Action Agenda.

The Great Lakes Program includes Sub-Basin Work Groups and Partner Priority Areas (PPA) for Ecosystem-Based Management. The draft GLAA does not mention PPAs or identify how

additional PPAs will be established. We encourage outreach to intermunicipal organizations to identify a PPA watershed within the Finger Lakes.

Comment on implementation

Soil and Water Conservation Districts are listed as partners for 19 actions, and local governments are listed for 46 actions. What is the proposed outreach to these groups to make them aware of the action agenda and to ensure they take steps to achieve the actions? We recommend adding an introductory section on “how to use this document” addressed to each of the partner groups listed.

Comments on monitoring

CWIO members participate on the Cayuga Lake Monitoring Partnership that includes researchers and stakeholders from the watershed with a goal to improve our understanding of the health of Cayuga Lake, natural processes, potential issues, monitoring needs, and best management practices. We encourage NYSDEC – Great Lakes Program to engage with this group on identifying and implementing monitoring needs.

The GLAA uses the Peter Drucker quote, “You can’t manage what you don’t measure.” CWIO requests that funding agencies be allowed to cover monitoring costs before and after project implementation as an eligible costs within grant funded projects to be able to assess impacts.

Comments on specific strategies

Strategies 2.1.1 and 2.1.3 should include Environmental Non-Governmental Organizations. For examples the Community Science Institute does critical surface water quality monitoring to address threats such as harmful algal blooms in the Cayuga Lake watershed.

Strategy 2.1.4 The NYSDEC should be listed as a partner in the development, implementation, and evaluation of clean water plans as they lead TMDL and Nine Element Plan efforts.

Strategy 2.1.6 should list local governments as partners for implementing roadway and ditch best management practices.

Strategy 2.4.5 should include anyone who is interested in water quality monitoring not just riparian landowners and K-12 students, and should include existing volunteer monitoring networks.

Comments on benefits and metrics

Three of the four benefits and metrics in Strategy 2.1 refer specifically to the Great Lakes but should be expanded to the entire watershed (for example, the metric “Reduced closings of Great Lakes beaches”). In addition, watershed management plans and clean water plans (Nine Element Plans and Total Maximum Daily Loads) are being developed in many smaller watersheds within the Great Lakes basin. These plans and the implementation should be tracked as part of the benefits and metrics.

Short-term metrics should be considered. For example, beaches may be closed for a variety of reasons and are difficult to connect to strategy implementation. Consider a metric such as nutrient concentration reduction in a specific, monitored stream or waterbody.

The benefits and metrics should include measurements that reflect the cross-cutting priorities. Examples include: tracking the number of plans and projects that specifically address climate change issues or green infrastructure in the design (strategy 2.1); tracking programs that serve

underrepresented farmers (strategy 2.3); tracking educational programs offered to populations in Environmental Justice Areas (strategy 4.4).

Comment on 2030 Outcomes

The 2030 outcome for invasive species is “Declining trends in new infestations of aquatic and terrestrial invasive species in NYS.” This outcome should be expanded to include existing and growing populations, not just new infestations.

We appreciate the NYS Department of Environmental Conservation – Great Lakes Program’s consideration of our comments.

Sincerely,



Elizabeth G. Thomas

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