



# Cayuga Lake Watershed Intermunicipal Organization

*Intermunicipal cooperation to protect the watershed*

***DRAFT***

May 3, 2022

Dear CLCPA Comment Reviewers,

The Cayuga Lake Watershed Intermunicipal Organization (CWIO) brings local governments in the Cayuga Lake watershed together to work collectively and collaboratively with partner agencies and organizations to monitor, protect, and restore water quality in the face of a changing world. The Cayuga Lake watershed includes all or parts of 50 municipalities, seven counties, and one indigenous nation.

The Climate Leadership and Community Protection Act (CLCPA or “Climate Act”) Draft Scoping Plan includes a number of important actions that affect the water quality of Cayuga Lake and would further efforts specified in the Cayuga Lake Restoration and Protection Plan<sup>1</sup> and the New York State Department of Environmental Conservation Harmful Algal Bloom Action Plan for Cayuga Lake<sup>2</sup>—both guiding documents of CWIO work.

General Comments:

- Climate change is affecting rainfall events and the amount of runoff, sedimentation, and nutrients entering Cayuga Lake and its tributaries. The goals of the Climate Act aim to reduce carbon emissions which are affecting rainfall events, therefore, **in general CWIO supports** the Climate Act Draft Scoping Plan.

Specific Comments:

## **Agriculture and Forestry**

- **Sustainable Forest Management sections.** Healthy forests help to absorb excess rainfall and slow down stormwater as it heads to Cayuga Lake and its tributaries. **CWIO supports the strategies in these sections:**

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<sup>1</sup> [http://www.cayugawatershed.org/documents/clwrpp\\_2017.pdf](http://www.cayugawatershed.org/documents/clwrpp_2017.pdf)

<sup>2</sup> [https://www.dec.ny.gov/docs/water\\_pdf/cayugahabplan.pdf](https://www.dec.ny.gov/docs/water_pdf/cayugahabplan.pdf)

AF1: Identify where Forest Management would Provide the Greatest Benefits

AF2: Prevent Forest Pests, Diseases, and Invasive Species and Restore Degraded Forests

AF3: Maintain and Improve Sustainable Forest Management Practices and Mitigation Strategies

AF4: Assist Landowners in Implementation of Sustainable Forest Management and Mitigation Strategies

AF5: Support Local Communities in Forest Protection and Management

AF7: Monitor Progress and Advance Forestry Science and Technology

AF8: Conduct Education and Outreach on Forest Management

Undeveloped forests help to absorb water and slow stormwater runoff.

- **Livestock Management:** Improper manure management contributes to the nutrient loading in the lake, which throws off the balance of the lake ecosystems. **CWIO supports** the strategies laid out in these sections:

AF9. Advance Alternative Manure Management

AF10. Advance Precision Feed, Forage, and Herd Management

- **Soil Health, Nutrient Management, and Agroforestry:** A healthy soil will soak up water more efficiently with less runoff. Focusing on soil health and nutrient management in general protects water quality. **CWIO supports** the strategies in these sections:

AF11. Advance Agricultural Nutrient Management

AF12. Adopt Soil Health Practice Systems

AF13. Increase Adoption of Agroforestry

AF14. Develop AEM Planning for Climate Mitigation and Adaptation

AF15. Monitor and Benchmark Agricultural GHG Emissions

AF16. Establish a Payment for Ecosystem Services (PES) Program

AF17. Bolster Local Agricultural Economies

## Chapter 19: Land Use

- **Protection, Restoration, and Monitoring of Natural and Working Lands.** Careful planning of how lands are used can heavily impact water quality. **CWIO supports** the strategies in sections:
  - LU1. Mitigate Carbon Emissions by Protection of Forest Lands
  - LU2. Afforestation and Reforestation
  - LU3. Avoid Agricultural and Forested Land Conversion
  - LU4. Protect and Restore Wetlands
  - LU5. Mapping, Research, Planning, and Assistance
- **Forests and Farmland in Municipal Land Use Policies.** Protecting farmlands and forests as part of municipal land use policies can heavily impact water quality. **CWIO supports** the strategies in sections:
  - LU6. Provide Guidance and Support for Afforestation and Reforestation to Local Communities
  - LU7. Increase Forest and Farmland Protection in Municipal Comprehensive Plans
- **Smart Growth.** Careful planning of how our communities grow can heavily impact water quality. **CWIO supports** the strategies in sections:
  - LU9. Regional and County Planning and Technical Assistance
  - LU10. Direct Planning, Zoning, and Pre-Development Assistance to Municipalities
  - LU11. Align State Funding Priorities

## Chapter 20: Local Governments

- Local governments will need assistance to implement many parts of the Climate Act therefore CWIO supports the goals of this section to assist in implementation of the Climate Act. Where appropriate, the State should adopt statewide measures and work with local governments to implement the policies. For example, LG2. Local Energy Policies notes that local governments are resource constrained and adopting policies such as energy conservation codes would be more effective at the State level.

## Chapter 21: Adaptation and Resilience

- Local governments are already facing threats to their residents through increased flooding and damage to roads and ditch systems due to high rainfall events exacerbated by climate change. Hazard mitigation and resiliency plans are important not only because of the threats to life and land, but also because of the detrimental effects of high stormwater events to the health of the lake and its tributaries. **CWIO supports** the strategies in this section that will reduce flooding threats to aquatic ecosystems, property and infrastructure, and preserve water quality throughout the watershed.

What's missing:

The New York State Department of Environmental Conservation Harmful Algal Bloom Action Plan for Cayuga Lake notes that climate change is one of the confounding factors that could increase the frequency or severity of cyanobacteria, or harmful algal blooms (HABs). These blooms can lead to the contamination of waters used for recreation and drinking water supply. Language should be included in the Draft Scoping Plan to address the impact of climate change on the prevalence and frequency of HABs, their danger to public health, and the impacts new policies will have on HAB mitigation.

Sincerely,