

RE: Clean Water Plan for Cayuga Lake

Dear Commissioner Seggos,

The Community Science Institute (CSI), in coordination with the Cayuga Lake Watershed Network (the 'Network'), the Cayuga Lake Watershed Intermunicipal Organization (CWIO), and other watershed partners, request that the New York State Department of Environmental Conservation (DEC) and U.S. Environmental Protection Agency (EPA) Region 2 engage with the Cayuga Lake community on the status of a Clean Water Plan for Cayuga Lake.

In July 2021, Cayuga Lake stakeholders submitted comments on the draft Total Maximum Daily Load (TMDL) for Total Phosphorus in Cayuga Lake. [CSI's comments](#) focused on phosphorus loading estimates. In the intervening time (almost two years), there have been no formal updates on the status of this document, which could be serving as guidance for watershed management priorities and decision making.

It is critically important that the DEC and EPA finalize a Clean Water Plan for Cayuga Lake:

- **With each year that passes, Cayuga Lake faces new and compounding water quality challenges due to invasive species, aquatic weed overgrowth, climate change, increasing nutrient pollution from stormwater runoff, and harmful algal blooms (HABs).** These trends threaten ecosystem health, human health, and regional economic vitality. In 2017, our lake faced the most extensive toxic HABs season recorded to date, resulting in closures of six beaches for a total of 62 beach days. In 2022, over 70 HABs were recorded between July and October, 36 with microcystin levels exceeding the NYSDEC criteria for a highly toxic bloom ($\geq 20 \mu\text{g/L}$). Also in 2022, six large localized or widespread blooms exceeded $2000 \mu\text{g/L}$ (Community Science Institute). The New York State Department of Health (NYSDOH) has set safe limits for public drinking water supplies at $0.3 \mu\text{g/L}$ and for public swimming beaches at $4.0 \mu\text{g/L}$.
- **Finalization of the TMDL increases the likelihood of securing grant funds for projects developed in the Cayuga Lake watershed.** A TMDL is a recognized Clean Water Plan, which adds priority points to grant applications. Neighboring lakes with newly approved Nine Element plans, which also convey priority points, are already able to use the advantage in securing funding.
- **Finalization of the TMDL increases our ability to implement the DEC's Cayuga Lake HABs**