October 29, 2019

Joanie Mahoney
Chair and Central Region Co-Lead
Reimagine the Canal Task Force
c/o SUNY College of Environmental Science and Forestry
1 Forestry Drive
Syracuse NY 13210

Dear Chairwoman Mahoney:

On behalf of the 1700+ members of the Oneida Lake Association (OLA) and many thousands of people whose livelihoods and quality of life depend on Oneida Lake, I write to thank you and your colleagues for inviting an OLA representative to the Sept. 24 Aquatic Invasive Species Focus Group for the Reimagine the Canal Task Force. At our last Board of Directors meeting, I tasked our Government Affairs Committee to review the Reimagine the Canal information and provide some input. The following reflects discussion points made by the committee on the topics of aquatic invasive species (AIS) management and water level management.

First, OLA has long been interested in measures to slow the spread of invasive species. Numerous alien species have affected our lake including zebra mussels, quagga mussels, round gobies, water chestnut, double crested cormorants, white perch, and spiny water fleas. It is too soon to know when and how these species will reach equilibrium in the lake ecosystem. But there is no doubt that some have negatively impacted Oneida Lake, especially its sport fishery, causing millions of dollars in negative economic impact and loss of recreation and tourism opportunities. The lake doesn't need more challenges, and OLA's offer to the Task Force and related agencies is that we are always willing to consult on AIS management strategies.

Second, we note with concern that the consultants' report does not mention the value added by the Canal's water level management infrastructure, policy, or practices. While this subject may have been beyond the scope of the AIS focus group, we are compelled to reiterate OLA's long-held position: It is necessary to maintain appropriate water levels in Oneida Lake for the good of the lake's ecology, property owners, and users. Current water level management practices have been beneficial for our lake and they must remain a high priority for the agencies that manage water levels, the fishery, and other aspects of the lake environment today and in the future.

Oneida Lake's inflows at Fish Creek, Oneida Creek, and Chittenango Creek are controlled only by nature, e.g. snowmelt and rain. By contrast, Oneida Lake's outflow is controlled by a combination of nature and humans, e.g. the shallow streambed of the Oneida River west of Brewerton and the New York State Canal Corporation infrastructure at Caughdenoy. From 1910-1952, outflow rates at Caughdenoy were controlled by a fixed dam. Since 1952, outflows have been controlled by moveable gates; a policy known as the "rule curve;" and responsive

procedures that balance the needs of the lake environment, wetlands, navigation, businesses, landowners, and other local considerations. In practice, lake levels have generally fluctuated linearly and predictably throughout the year within the rule curve range of 370.3' Barge Canal Datum (BCD) to 371.2' BCD depending on time of year.

OLA's position statement on water levels, adopted 25 years ago by unanimous vote of the Board of Directors, reads in part: "Water level management in Oneida Lake should consider the entire Oneida Lake ecosystem while maintaining lake levels between 368' BCD and 372.4' BCD. Any strategies developed to prevent Oneida Lake from exceeding flood stage must not involve lowering Oneida Lake to an elevation of less than 368' BCD."

Consequences of lowering the lake level below 368' BCD include:

- Fishing and pleasure boating opportunities are diminished because launches, docks, and marinas are made too shallow for boat access and midlake shoals become more hazardous.
- Spawning shoals used by walleye pike become exposed.
- A winter "dead zone" below the ice is created between elevation 368.5-370' BCD.
- Roots of aquatic vegetation freeze, killing invaluable plants and depriving fish of habitat.
- Invertebrates critical to the food web are frozen and killed.

The Caughdenoy gate infrastructure, the rule curve policy, and real-time management have been beneficial for Oneida Lake's users, property owners, and the lake ecosystem. In this hydrological system where nature can always pour more water into the lake than the river downstream can take out, these tools have proven to be reasonable, efficient, and environmentally responsible. In addition to the environmental benefits they have ensured a stable, reliable water supply for Oneida Lake navigation, including local navigation which is far more prevalent than traveling the whole canal.

Whatever the Task Force may recommend for the future of local locks, we ask that you and your colleagues promote preserving and investing in responsible water level management. Responsible management benefits everyone who uses Oneida Lake and directly benefits the lake ecosystem. We urge the Task Force to keep these considerations in focus.

OLA is happy to talk with any representative of the Task Force about these issues. If you have any questions, please e-mail me at bill.girvan@yahoo.com. Every OLA member and everyone who uses or benefits from Oneida Lake appreciates you considering our input.

Sincerely,

William A. Girvan

William Girvan
President
The Oneida Lake Association, Inc.