

Dear Assemblyman Stirpe,

**The Oneida Lake Association with its 2400 members strongly opposes the NYS DEC's proposal to reclassify and regulate Oneida Lake as a wetland.**

As you know, DEC is proposing that on January 1, 2025, the current NYS Freshwater Wetlands Maps will no longer limit DEC regulatory jurisdiction to wetlands depicted on regulatory maps. Instead, maps will become informational, and any “wetlands” that meet the applicable definition and criteria will be regulated by DEC and subject to Article 24 permitting. DEC has made it clear that lakes or parts of lakes could fall under their definition of a wetland.

Of course, the Oneida Lake Association continues to support the regulation of wetlands. We understand and support the many benefits that wetlands provide to our precious natural resources. We recognize and support the need to protect aquatic vegetation, as well as the abundant wildlife that depend on wetlands for a safe and protective habitat.

Nevertheless, we are dismayed and alarmed at DEC's effort to classify lakes—especially the largest inland lake in the state—as a wetland. This egregious over-reach of authority would place hundreds of homes surrounding the lake under strict DEC regulation.

The DEC proposal intends to rely on a broad definition of a wetland that allows for classification based not only on the presence of typical wetlands characteristics, but on the presence of submerged aquatic vegetation of any kind in a contiguous area of 12.4 acres or more (which will be reduced to 7.4 in 2028). According to the DEC website almost any activity that might adversely impact a designated wetland would fall under their regulations.

Furthermore, these regulations call for a 100-foot buffer which means that any property that falls within this buffer would also be subject to regulation. This proposal would instantly place hundreds of lakeside homes under DEC's regulation! Although the DEC has tried to mollify our concerns by stating that “ordinary use” would be exempt, our OLA members cannot rely on that vague and unclear assurance.

As the largest lake in New York State, Oneida Lake provides an enormous economic engine that helps drive the future of Central New York. The lake, with over sixty miles of shoreline and several hundred houses in its vicinity, is home to many thousands of taxpayers. For the past two hundred years or so, the lake has provided numerous recreational pastimes including fishing, angling, boating, sailing, swimming, and much more. The Oneida Lake Association already has as its core mission the stewardship of this precious resource. We have successfully helped to protect this lake since 1945, nearly eighty years. Also, Oneida Lake already falls under the jurisdiction of Article 15, Title 5 of Environmental Conservation Law. This law specifically provides for the “preservation, protection and enhancement of the present and potential values of the water resources” through regulations that are “reasonably consistent with the state's social and economic development.”

The unfounded designation of Oneda Lake as a wetland could seriously impact our residents' ability to enjoy the many activities they engage in year-round. Property values could plummet if

sections of the lake fall under strict DEC regulations. This result would have a serious impact on the tax revenue of schools and municipalities.

**Therefore, the OLA and its 2400 members strongly urge you to oppose this DEC proposal. One specific action you could take is to support Senate Bill 9799 and Assembly Bill 10653. This common-sense bill simply states that navigable waters larger than 150 acres would be exempt from the DEC's classification as a wetland. Our 2400 members eagerly await news of your support of this bill.**

Please let us know your thoughts.

Sincerely,

Matt Snyder  
Oneida Lake Association President

Cc Miller  
Buttenschon  
Mannion  
Walczyk  
Griffo

(This link below is just for reference, not part of the letter)

NYS wetland reg info: <https://dec.ny.gov/nature/waterbodies/wetlands/freshwater-wetlands-program#:~:text=The%20public%20are%20invited%20to,NYCRR%20Part%20664%2C%20Freshwater%20Wetlands.&text=Written%20comments%20on%20this%20Advanced,of%20business%20February%2020%2C%202024>.