

Upper Saranac Foundation

It still is, and always will be, about Water Quality.



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RE: Draft Marina Regulations

The Upper Saranac Foundation (USF) appreciates the time and efforts that Town Board members have put into the preparation of the proposed Commercial Marina Regulations. The Town's goal of establishing regulations to ensure conservation and protection of the town's natural resources parallels the USF's mission to protect water quality. Over the years, the USF has had great success partnering with the town in our beautiful watershed.

We believe that the USF is a strong educated voice for the watershed and that our deep understanding of water quality and natural resources provide the Town with important information for the governance and protection of water quality.

While the USF supports active and viable marinas in the watershed, we also want to ensure that any marina in the watershed operates based on a comprehensive environmental plan granted by the Town. As always, the USF is driven by a desire to protect watershed water quality and to prevent any potential negative impacts.

The USF is particularly supportive of several aspects included in the draft Marina Regulations including:

- A Plan to thwart the spread of aquatic invasive species - consistent with the USF's *Upper Saranac Lake AIS Prevention and Preparedness Plan*.
- A Stormwater Prevention Plan to reduce runoff, erosion, and sediment infiltration.
- Prohibiting quick launch motorboat storage (dry vertical boat stacking storage and launching)
- A boat cleaning area that is designed, operated, and maintained in such a manner to prevent contamination of the waters.
- A plan for inspection and maintenance of petroleum storage facilities and all associated equipment, and appropriate measures relative to spill prevention and countermeasures.
- A maintenance program to keep all adjacent shoreline, and the waterway clean of debris.
- Lighting strategies to comply with International Dark-Sky Association guidance.

- Guidelines for Commercial Docks including floating docks made only of encapsulated flotation devices plus consideration of obstacles to navigation, recreation, and use of waters.

In addition to the positive aspects noted above, the USF would also like for the Town of Santa Clara to include some additional key elements which we believe would provide needed protections to the watershed. These include:

- Authorize a comprehensive analysis to assess the waterbodies' carrying capacity to withstand various watercraft uses and boater traffic. This should be done prior to permitting the expansion or allowing new marinas. Included should be considerations of impacts from boat size, noise, speeds, wakes, and wave action. With an understanding of carrying capacity, the Town should draft regulations for all future developments or expansion of marinas.
- Guidelines to regulate dock slips with an understanding of types (rental vs seasonal boat owner slips) to allow town residents dockage.
- Add to the Stormwater Prevention Plan limitations on impervious surfaces and addition of stormwater bio-retention or detention basins.
- Require that marinas submit a visual assessment site plan. Where impacts are identified, require the applicant to eliminate or mitigate adverse aesthetic effects.
- Provide the Planning Board with additional clear guidelines on the number and allowable square footage of docks on waterfront footage for marinas

Pressures on the watersheds limited resources call for pro-active steps to protect our future. It is the USF's desire that marina regulations can be devised and implemented so that they can allow individuals to enjoy activities in the watershed for years to come and, at the same time, protect the environment.

The USF believes that partnerships based on shared values and stewardship can protect water quality and environmental beauty of Upper Saranac Lake. We believe that the USF and the Town of Santa Clara have this type of partnership.

Thank you again for your hard work in preparing the proposed Commercial Marina Regulations.

Sincerely,



Tom Swayne
President, Upper Saranac Foundation