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January 5, 2026

Environmental Protection Agency
Office of Water
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Submitted via comment portal:

www.regulations.gov/commenton/EPA-HQ-OW-2025-0322-0001

**RE: Docket ID No. EPA-HQ-OW-2025-0322
Waters of the United States (WOTUS)**

The Cayuga Lake Watershed Network (CLWN) submits this comment, urging the Environmental Protection Agency to retain the current definition of Waters of the United States and to refrain from further weakening federal clean water protections.

Scientific consensus is clear: headwater streams, wetlands, and ephemeral waterways play a critical role in protecting downstream water quality and water quantity. The loss or degradation of these waters directly harms drinking water supplies, increases nutrient and sediment pollution, and undermines the ecological integrity of downstream lakes and rivers. Changes that reduce protections for these waters ignore decades of hydrologic and ecological science.

If the proposed rule is fully implemented, an estimated 85% of wetlands in the United States would be at risk of destruction or degradation, and approximately 55% of the nation's drinking water would originate from sources left vulnerable by weakened protections. These waters are not isolated or expendable; they are fragile, interconnected, and irreplaceable components of our shared waters.

CLWN works across the 860-square-mile Cayuga Lake watershed in central New York. Cayuga Lake is the largest of the Finger Lakes and a vital drinking water source, recreational resource, and ecological asset for our region. The lake is fed by 37 major tributaries and hundreds of smaller streams, many of which originate in headwater areas, wetlands, and ephemeral channels throughout the uplands. These waters regulate flows, filter pollutants, and sustain baseflow during dry periods, which is essential to our lake's health.

Cayuga Lake is one of eleven Finger Lakes that collectively drain north to Lake Ontario, a binational drinking water source shared by communities in both the United States and Canada. Weakening protections for upstream waters in this region places downstream waters at risk far beyond individual property boundaries. Federal clean water protections remain essential for protecting interconnected and interstate waters and for ensuring consistent safeguards for downstream communities beyond state boundaries.

Communities throughout the Cayuga Lake watershed are deeply invested in protecting water quality through science-based planning, stewardship, and public engagement. Federal clean water protections are foundational to this work. Rolling back federal protections would create regulatory gaps and inconsistencies that weaken comprehensive watershed-scale protection efforts, even in states like New York that have adopted stronger wetlands safeguards.

For these reasons, CLWN strongly urges EPA to retain the current WOTUS definition and uphold robust protections for headwater streams, wetlands, and ephemeral waters. Doing so is essential to protecting public health, downstream communities, and the long-term integrity of our nation's waters.

Thank you for the opportunity to submit these comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Liz Kreitinger', with a stylized, cursive script.

Liz Kreitinger
Steward/Executive Director
Cayuga Lake Watershed Network