

May 18, 2017

RoAnn M. Destito
Commissioner of General Services
Corning Tower
Empire State Plaza
Albany, New York 12242

Re: *Objections to Application for Installation of Floating Docks at
1938 W. Lake Road, Skaneateles, New York 13151*

Dear Commissioner Destito:

I have been authorized by the Town Board of the Town of Skaneateles (the "Town") to provide the following comments concerning the application (the "Application") of 1938 West Lake Road, LLC (the "Applicant") to the Office of General Services for a license to install floating docks on Skaneateles Lake (the "Lake") in connection with Skaneateles Marina located at 1938 W. Lake Road, Skaneateles, New York 13151 (the "Marina"). The Notice of Application was served upon the Town on April 28, 2017. The Town Board has now discussed the Application at two separate public meetings and has determined that that it opposes the Application in its current form. The Town Board does not oppose the concept of the Applicant receiving permission from OGS to install floating docks, however, the Board believes the scale of the current proposal would result in serious negative impacts for the adjacent municipal boat launch, neighboring property owners and the community as a whole.

The information provided to the Town about the intended Application indicates that the Marina wishes to install floating docks that would accommodate storage for approximately 130 boats on the water. Currently, there is space for approximately 40 boats to be stored on the water at the Marina secured by moorings attached to floats.

The Town Board has considered and discussed the factors listed at 9 NYCRR § 270-3.2 and received input from the public. It is our hope that the Commissioner will consider the Town's objections and the objections made by neighboring landowners. The installation of floating docks as proposed by the Applicant will negatively impact neighboring property owners, public recreation opportunities, navigation of the Lake and natural resources. Furthermore, the Application fails to address serious concerns related to increased traffic at the Marina and inadequate parking that would be exacerbated by the proposed expansion. The Town respectfully requests that the Commissioner reject the Application, or in the alternative, open a public notice and comment period pursuant to 9 NYCRR § 270-5.4(b) and a hearing pursuant to 9 NYCRR § 270-5.50.

I. Interference with Navigation

The proposed floating docks will interfere with navigation. Currently, boaters can travel through and among the floating moorings. However, the proposed floating docks would extend several hundred feet out into the Lake and change the status quo by creating an impassable barrier. The proposed floating docks would require boat operators to travel around the docks instead of traveling through the moorings, greatly impeding north/south navigation near the Marina.

II. Interference with Public Recreation and Neighboring Uses

If the Application is granted as proposed, installation of the floating docks would have substantial negative effects relating to fishing, the public's ability to use the Town boat launch, boat traffic, parking, safety and the neighboring property owner's quality of life.

A. Fishing

If the proposed floating docks are constructed, boat operators who engage in recreational fishing would no longer be able to fish in front the Marina's property because the floating docks would impede their ability to access this part of the Lake. The current mooring field does not impede fishing on the Lake.

B. The Town Right-of-Way and Boat Launch

By way of background, the property on which the Marina is located is bordered to the north by Lacy Road. Lacy Road is a town road that includes a 66 foot wide right-of-way and a municipal boat launch that may be used by residents free of charge. This is the only boat launch owned by the Town and represents an important means by which the public may access the Lake. The Town and the Applicant have abided by a long-standing agreement whereby the Applicant has been permitted to construct and maintain a limited number of improvements within the Lacy Road right-of-way to facilitate Marina operations, including a dock and even a building that encroaches onto Town owned land, in exchange for the Marina allowing the public to tie up to the existing dock and use a turn-around area in connection with launching boats onto the Lake. This arrangement has proven mutually beneficial and has resulted in high volumes of boaters and vehicles utilizing the Lacy Road boat launch during the summer months.

The Application does not accurately reflect the proposed location of the floating dock system in relation to the Town owned Lacy Road right-of-way located immediately to the north of the Marina property (see enclosed survey). The most recent iteration of the Applicant's plan also depicts use of the Town owned right-of-way for lined parking spaces and use of the Town owned parking lot on Lacy Road, east of Route 41A, as an "over-flow" lot. Obviously, the Town has not granted permission for its land to be used as Marina parking and has no plans to change that position because the full width of the right-of-way is needed in connection with the boat launch. In sum, without the use of

Town owned land as proposed by the Application, the proposed expansion of the Marina is absolutely unworkable in terms of parking and traffic.

C. Boat Traffic and Safety

The Applicant alleges that increasing the number of boats stored on the water from 40 to 130 will not increase the overall use of the Marina because it will reduce the number of boats stored on shore at the Marina. On its face, this argument seems reasonable, however, it relies on the Marina ceasing to store boats on shore. In reality, the Applicant has admitted in public meetings that the demand for the Marina vastly outpaces capacity and that they have a long waiting list. Thus, the far more likely scenario is that approximately 70 boats will be moved from shore storage to the floating dock system, but then, those storage spaces on land will not go unused and the net number of boats using the Marina will increase substantially.

A portion of the Marina's proposed floating dock crosses over into the direct line of travel from the municipal boat launch, causing boats to have to go around the dock and any secured boats attached thereto. Increasing the number of boats stored at the Marina would undoubtedly magnify this problem and present a potential safety risk. It should also be noted that because of the shape of the shoreline at this location, the proposed floating dock would be directly off shore from several of the existing neighboring parcels that also have docks and swimming areas in close proximity to the proposed new construction.

The installation of so many floating docks would require those who utilize the launch to take even greater care upon entering the Lake because the path the boats would need to take would be significantly more limited. To avoid colliding with the boats that are proposed to be secured at the floating dock, and the additional boat traffic generally, boat operators would be forced to follow a course heading north from the launch. This would cause an increase in boat traffic on the water in front of the residential properties north of the Marina which would present a potential safety concern for property owners utilizing the shoreline for recreational purposes, such as swimming. The Town has an interest in promoting safety and well-being with regards to recreational use of the Lake and believes that this addition would both hinder recreation uses and pose a potential safety risk.

In the same vein, by increasing the size of the Marina so drastically there would be an increase in automobile and boat traffic at or near the launch and an increase in the number of cars parked at a Town operated and maintained parking lot. This would impede and frustrate the use of the launch for those who do not store their boats at the Marina.

D. Noise and Visual Impact

The proposed expansion of the Marina would have a significant negative impact on the neighboring properties in terms of noise and visual impacts. The addition of such a

substantial number of floating docks would have a negative visual impact for neighboring property owners. Many more landowners near the Marina would be able to see the docks and boats than currently see the moorings attached to floats. The proposed docks are also undeniably more visually intrusive compared to the floating moorings. Furthermore, the addition of floating docks to the Marina's waterfront is more likely to result in the collection of debris than the current use of moorings attached to floats because the debris would have nowhere else to go. This would further contribute to negative visual impacts.

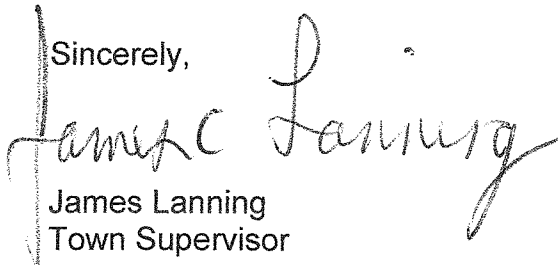
Neighbors have expressed concern over the potential for unwanted noise from the Marina created by increased traffic (boat and automobile), more boats idling at the docks and the sound of the boats continuously banging against the docks. Perhaps most concerning, the docks would be a gathering place for people to socialize and congregate. It is easy to imagine how many more people would be present at a 130 slip floating dock when compared to the current 40 floating moorings that require smaller craft to access the boats moored there. All of the neighboring properties are residences. This more commercial environment would be located next to people's homes.

III. Natural Resources

The installation of the proposed floating docks may also negatively impact water quality. The Lake serves as a source of drinking water for tens of thousands of people, including citizens of the City of Syracuse. As indicated above, the Marina is proposing to more than triple the number of boats that are currently stored on the water at the Marina. This would substantially increase the potential for spills and releases of chemicals and fluids into the Lake which would increase the concern for contamination of a drinking water source for thousands. The actual structure would also consist of many tons of steel being placed into the Lake. This issue requires additional study.

Based on the foregoing concerns related to the Application, we hope you will consider rejecting the Application or in the alternative, providing a public notice and comment period and a hearing. Thank you for your time and consideration and we look forward to hearing from you soon.

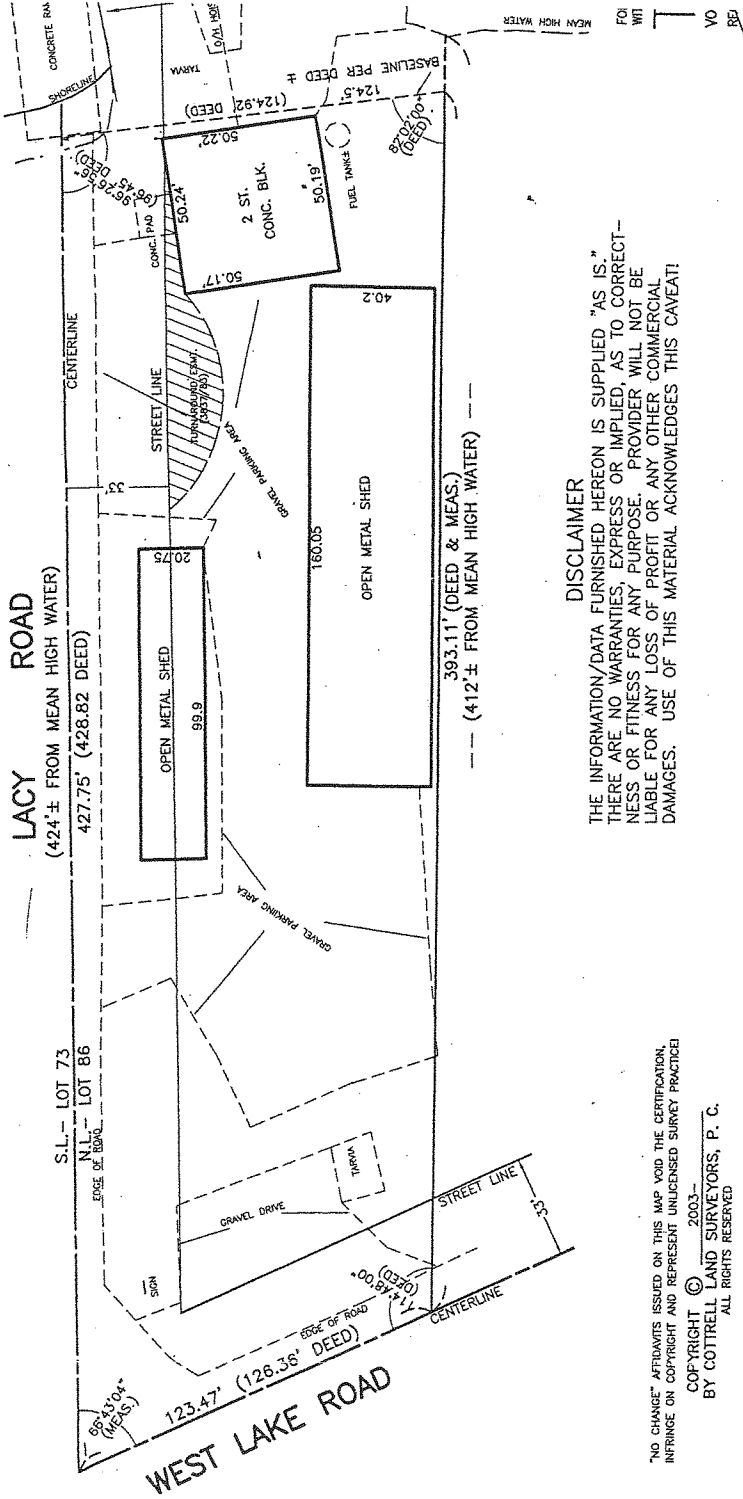
Sincerely,



James C. Lanning
Town Supervisor

SURVEYORS: REFERENCE TO, USE OF OR
 CONSENT FOR WATER, PURPOSES, VIOLATES ANY
 COPYRIGHT AND ABSOLVES ME OF ANY LIABILITY
 FOR OMISSIONS AND ERRORS AND OF ANY
 RESPONSIBILITY FOR RESULTANT DAMAGES.

AREA = 0.832± ACRES TO MEAN HIGH WATER
 (EXCLUDING ROADS)



DISCLAIMER

THE INFORMATION/DATA FURNISHED HEREON IS SUPPLIED "AS IS." THERE ARE NO WARRANTIES, EXPRESS OR IMPLIED, AS TO CORRECTNESS OR FITNESS FOR ANY PURPOSE. PROVIDER WILL NOT BE LIABLE FOR ANY LOSS OF PROFIT OR ANY OTHER COMMERCIAL DAMAGES. USE OF THIS MATERIAL ACKNOWLEDGES THIS CAVEAT!

"NO CHANGE" AFFIDAVITS ISSUED ON THIS MAP VOID THE CERTIFICATION, INFRINGE ON COPYRIGHT AND REPRESENT UNLICENSED SURVEY PRACTICE!

2003-
 BY COTTRELL LAND SURVEYORS, P. C.
 ALL RIGHTS RESERVED

COPIES WITHOUT EMBOSSED SEAL
 ARE UNAUTHORIZED AND
 HAVE BEEN ALTERED.

USERS: THIS MAP IS NOT USABLE NOR CERTIFICATIONS EXTENDABLE FOR UNREGISTERED PURPOSES OR FOR SUBSEQUENT TRANSACTIONS EXCEPT BY THE WRITTEN CONSENT OF OR BY SURVEY UPDATE BY THE UNDERSIGNED ONLY.

**PART OF LOT 86 - TOWN OF SKANEATELES
 ONONDAGA CO., N.Y.**

No. 1938 LACY ROAD

SCALE: 1" = 40'
 MAR. 5, 2003
 COTTRELL LAND SURVEYORS, P.C.
 MANLIUS, NY - (315) 682-8121

I.D: 56-01-10
 FILE: LACY RD., ALSO R.56-1-11(L73)
 B/P: 374/141