

Office of the County Executive

Monroe County, New York

Maggie Brooks
County Executive

James P. Smith
Deputy County Executive

March 17, 2006

Dennis L. Schornack
Chairman
International Joint Commission
U.S. Section
1250 23rd Street, N.W., Suite 100
Washington, D.C. 20440

Re: Lake Ontario-St. Lawrence Study Board Recommendations

Dear Chairman Schornack:

The County of Monroe expresses its concern regarding the Lake Ontario-St. Lawrence River Study Board's recommendations on water level and flow management for Lake Ontario and the St. Lawrence River.

In July 2005, I requested the Study Board create a new candidate plan that would retain Plan 1958D with deviations and the essential protections provided for the south shore communities by the criteria contained in the existing Orders of Approval. Although operation under Plan 1958D has resulted in some extreme water levels, the Plan's criteria establish an important four-foot target range of operation intended to provide protection and relief to riparians in the event of excess supply. Unless regulated by equivalent criteria, the proposed candidate plans will allow for significantly higher levels as the norm, rather than as the exception. As a consequence, all of the candidate plans, as the Study predicts, will bring a higher probability of damage from flooding and erosion to riparian interests and public infrastructure.

In Monroe County, there are approximately 37 miles of shoreline property with an estimated land value of \$230 million. The Town of Greece, which is most susceptible to the devastating effects of high lake level, has nearly nine miles of shoreline with an estimated land value of \$78 million. Any loss in shoreline land value translates into the subsequent loss in vital property tax revenue to the County and shoreline Towns. Despite repeated public comment on this issue, the economic impact of property value reduction was not included in the Study's economic evaluation.

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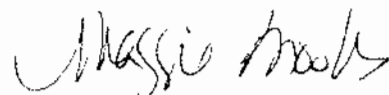
Public infrastructure threatened by the high lake levels includes the County Pure Waters' 36-in. diameter Lake Shore sewer interceptor, Edgemere Drive, the Port of Rochester, and nearly eight miles of parkland including Ontario Beach Park and Zellweger Beach Open Space. In 1998, over 5,000 sandbags were required to protect the Monroe County Water Authority's Edgemere Pumping Station and the Brockport Water Treatment Plant. Together these facilities provide drinking water to over 600,000 residents in five counties; namely, Genesee, Monroe, Ontario, Orleans, and Wayne Counties. Potential damage to this infrastructure was also ignored in the Study.

Throughout the course of the five-year Study, we operated under the assumption that municipal infrastructure and riparian interests would be better protected, not further threatened, by a new plan. As a minimum, we expected that shoreline interests would be protected as they are under the existing Orders of Approval. Despite assurances made by the Study Board, the three recommended plans were not modified to avoid or minimize the damages to south shore communities.

For over 40 years, the four-foot target range specified in the Orders of Approval has been the basis for our community's development of shoreline public infrastructure, navigation channels, and tax base. By not retaining these criteria, the Study's recommendations would remove the basic protections afforded by the U.S. and Canadian governments to our shoreline property owners and public infrastructure.

Therefore, I urge the IJC not to adopt any of the three candidate plans recommended by the Study Board without inclusion of the criteria established by the existing Orders of Approval or equivalent protection for south shore communities.

Sincerely,



Maggie Brooks

Monroe County Executive

cc: Hon. Joseph E. Robach, 56th Senatorial District
Hon. William D. Reilich, 134th Assembly District
Hon. Douglas B. Dobson, 7th Legislative District
Hon. John T. Auberger, Greece Town Supervisor
Hon. David M. Barry, Greece Town Board
James Smith, Deputy County Executive
Mike Garland, Deputy Director of Environmental Services
Muffy Meisenzahl, Administrator, Office of Emergency Preparedness
Ed Marianetti, Executive Director, MCWA