



Lake Ontario Fisheries Coalition
c/o Jefferson County Job Development Corporation
Watertown, New York



July 18, 2006

Dennis L. Schornack, Chairman
International Joint Commission
U.S. Section
1250 23rd Street N.W., Suite 100
Washington, DC 20510

International Joint Commission

ACTION: BM
INFORMATION: LB, JC, FB, RT, QRS
FILE:

Dear Chairman Schornack:

At the July 7, 2006 meeting of the Lake Ontario Fisheries Coalition, the following resolution was made and carried.

Motion by Mr. James McGowan, Second by Mr. Paul Thiebeau to send another letter to the IJC in support of Plan B+. All in favor. Carried.

Plan B+ is supported for the following reasons:

The environment has been degraded by regulation. The degradation has not stopped; loss of habitat and diversity is continuing as a direct result of water level regulation. There has been a 50% reduction in meadow-marsh and emergent, floating vegetation since regulation was implemented (Final Report, pg. 17). This ongoing degradation is continuing and may be accelerating under the existing Plan 1958-DD.

One of the primary goals of the study is to develop a plan that will enhance environmental conditions. Plans B+ is by far the best plans for the environment. As presented in the study, Plans A and D may not provide overall environmental benefits over the existing plan, 1958-DD (which is recognized as a plan which seriously impacts the environment).

Seemingly minor impacts to one part of the environment can result in significant impacts to the environment as a whole and to the citizens of the region. The following paragraph taken from Page 17 of the Final Report does a good job of outlining the concern:

“Briefly, water level regulation has reduced the variety of plant species along the coast, which creates stresses on the animal populations that thrive on plant types that suffer under regulated water levels. In general, a more diverse environment will better resist impacts from environmental threats in the Great Lakes, such as toxins and invasive species (Tillman and Downing, 1987; Schindler, 1998). Lake Ontario coastal marshes provide breeding and feeding grounds for all coastal life, including several species-at-risk. Water level patterns have a direct physical influence on the breeding and nesting success of marsh birds and fish that inhabit the marshes. More varied water levels create more variety in marsh plants, which creates a more productive and robust coastal ecology and habitat. Water levels on the St. Lawrence River can strand fish or drown bird eggs. The societal value of the environment is expressed through laws protecting habitat (i.e., wetlands) and specific faunal species (special interest or endangered).”

Erosion happens and you are not going to stop it with any plan!!

The only thing achieved by staying with Plan 1958-DD is delaying the inevitable at the cost of the environment. Along highly erodible areas of the south shore the average annual erosion rates are slightly less per year with Plan 1958-DD than with Plan B⁺, a very small gain at a sizeable environmental price. (Final Report, pg. 76).

Some say that Plan B⁺ will result in significant additional flooding damage on Lake Ontario. It will not. Preliminary data show a \$0.2 million average annual additional flooding damage along Lake Ontario when compared to the \$571 million baseline value in parcels demonstrates relatively small impact. (Final Report, pg. 72)

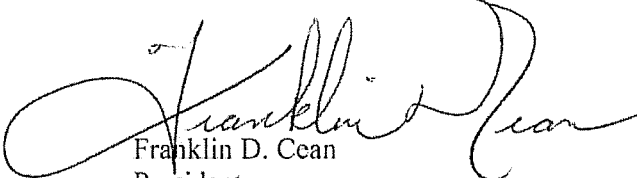
Some say that Plan B⁺ will result in catastrophic damage to shore protection structures. Preliminary data indicate that under Plan 1958-DD current shore protection losses would total about \$54 million annually. Under Plan B⁺ losses might increase by about 3%. This is a small price to pay for the sizable environmental benefits of Plan B⁺. (Final Report, pps. 63, 64).

The Lake Ontario Fisheries Coalition strongly supports the implementation of Plan B⁺. We oppose implementation of Plan A⁺ or D⁺ as they accomplish very little and have significant shortcomings.

We ask that you not fall back on 1958-DD. Of all the plans under consideration, that is the worst, the least effective and will continue to cause unacceptable environmental harm.

Very truly yours,

LAKE ONTARIO FISHERIES COALITION



Franklin D. Cean
President