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Mr. Dennis L. Schornack
Chairman, United States Section
International Joint Commission
1250 23rd Street NW, Suite 100
Washington, DC 20037

International Joint Commission

ACTION: RT

INFORMATION: LG, SC, FB, RT, CMRS

FILE:

Dear Chairman Schornack:

The Nature Conservancy appreciates the opportunity to participate in the International Joint Commission's five-year International Lake Ontario-St. Lawrence River Study. We recognize and applaud the efforts of the Commission and the Study directors to develop a clear understanding of the needs of the LOSL coastal zone ecosystem, and to build sophisticated tools for balancing these needs with the needs of the communities adjacent to the lake and river.

Sound water management is an essential step in preserving the biodiversity of freshwater ecosystems like the Great Lakes, and The Nature Conservancy recommends that the following five basic principles guide water management practices and policies:

- Restoring and maintaining natural flow regimes and natural variability to the greatest extent possible and in a manner compatible with human uses;
- Restoring and maintaining hydrologic regimes that protect the full range of species, communities, and ecosystems that naturally occur within a watershed;
- Using site-specific information about species, communities, and ecosystems that naturally occur in a watershed as a basis for decisions when hydrologic regimes are actively managed (e.g., controlling lake levels, operations of dams, etc.);
- Monitoring changes in ecological systems when active management of hydrologic regimes occurs and making adjustments to protect and improve ecological integrity;
- Including a margin of safety in water management programs.

We commend the Study Board for proposing an alternative regulation plan that embodies these principles. The scientific basis that underlies "Plan B+" closely conforms to these guidelines, and the key performance indicators developed by the Environmental Technical Working Group clearly demonstrate the benefits of an approach to water management that mimics the natural flow regime of the LOSL ecosystem. The plan accomplishes this while providing overall economic benefits above current conditions and by minimizing impacts on other user groups of the Lake.

It is important to note that worldwide scientific literature highlights the typical cascade of effects resulting from alterations of the hydrology of lakes and rivers – competitive dominance by robust emergent plants, reduced species diversity in riparian habitats, and exclusion of keystone species. The benefits of even partial restoration of natural rhythms and flows have been demonstrated in lake and large river systems worldwide. The scientific studies on which Plan B+ rests are entirely consistent with this global consensus.

Plan B+ constrains the levels of Lake Ontario within a range comparable to the range permitted by Plan 1958DD – the comparison of the simulated 20th century range for both plans demonstrates this

similarity. However, within a carefully controlled range of water levels, Plan B+ restores the natural 15-30 year cycles of Lake Ontario in a way that will clearly have lakewide benefits to the wetlands, coastal habitats, and species that have evolved over thousands of years in response to the hydrologic rhythms of Lake Ontario.

We recognize that partially restoring the natural cycles of Lake Ontario may increase the rate of coastal erosion, particularly along reaches of the Lake's southern shore. We support equitable approaches that will help those affected by increased erosion with the cost of maintaining existing shoreline protection structures in these areas. Many of these possible mitigation steps have been highlighted by the Study Board. We also encourage the Commission to include an adaptive management approach to implementing a new management plan so we can continue to learn and improve the management of these resources.

The process and work to develop an improved management plan for the Lake has the potential to be a global model for the management of bi-national resources. The plan that mimics Lake Ontario's natural hydrologic periodicity – while dampening the extremes that lead to economic damages – is so sound that this approach merits the fullest consideration by the IJC Commissioners. We therefore ask your support for Plan B+ as developed by the Study Board.

Thank you for the opportunity to participate in the LOSL Study, and for the opportunity to submit these comments. We will be glad to provide further information in support of our recommendations, and to assist the Commission in considering and implementing a plan that restores the natural processes of Lake Ontario and the St. Lawrence River. We urge the International Joint Commission to implement Plan B+ as the approach that balances ecological needs with economic concerns, and achieves net economic benefits for the people of the Lake Ontario watershed.

Sincerely,



John C. Cook
Regional Managing Director
Eastern U.S. Conservation Region

The Nature Conservancy is an international, nonprofit organization dedicated to the conservation of biological diversity. Our mission is to preserve the plants, animals and natural communities that represent the diversity of life on Earth by protecting the lands and waters they need to survive. Our on-the-ground conservation work is carried out in all 50 states and in 27 foreign countries and is supported by approximately one million individual members. We have helped conserve nearly 15 million acres of land in the United States and Canada and more than 102 million acres with local partner organizations globally. The Conservancy owns and manages approximately 1,400 preserves throughout the United States—including two preserves in the magnificent barrier beach and lagoon ecosystem along the eastern shore of Lake Ontario.