



August 31, 2006

Canadian Section Secretary
International Joint Commission
234 Laurier Avenue West, 22nd Floor
Ottawa, ON K1P 6K6

Dear Commission Members,

Thank you for the opportunity to submit our observations and recommendations concerning the report of the International Lake Ontario – St. Lawrence River Study Board.

We submit that Plan 1958D holds many attributes that have proven to be very practical and valuable over the years, including the practice of allowing the Control Board to deviate from the Plan given special circumstances.

Should continuation of Plan 1958D prove to be untenable in the future, we recommend the adoption of Plan D⁺ as it represents the most viable alternative. However, we remain concerned about the roles and responsibilities of a new Board and its mandate to authorize deviations from the Plan. Deviations from the Plan may prove to be vital in light of unpredictable conditions, and the need to act in the best interest of all stakeholders as a whole.

It is also our position that the full implementation of any new plan should be delayed to allow time to run Plan 1958D in parallel with a simulation of Plan D⁺, in order to monitor and assess the impact and effectiveness of the new Plan, and to ascertain whether the model assumptions were realistic.

Marine transportation remains the most energy efficient mode of transportation, and generates the lowest quantity of greenhouse gas emissions per ton / mile, directly contributing to our quality of life. It is important to ensure, therefore, that the new Plan does not adversely affect safe, reliable and efficient marine transportation systems.

Please do not hesitate to call upon us or our members to further discuss the importance of this initiative to marine transportation in Canada.

Sincerely yours,

Donald Morrison
President

<p>IJC / CMI OTTAWA ACTION: <i>J. Mc Aubley</i> INFO: <i>me / mu / mh / F. Boudreau</i> SEP 01 2006 FILE / DOSSIER 3-1-A-9 (68)</p>
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