

U. S. Section Secretary
International Joint Commission
1250 23rd Street NW, Suite 100
Washington, DC 20440 fax 202 467-0746

September 5, 2006

Dear Sir,

Save the River and other environmental organizations have organized an extensive campaign to support Plan B+ as put forth in the Final Report of the International Lake Ontario – St. Lawrence River Study Board. The reasoning behind this position is based on some **seriously flawed assumptions**.

Environmental Position of Save the River:

Save the River assistant director, Kathleen Nadder Lago, has stated that there is one overall main goal that we should aim for in water level management: To restore Lake Ontario and St. Lawrence River water levels as closely as possible to the way they were before they became managed a half-century ago.

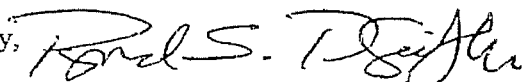
Main Assumption of that Position: This quest for restoration of past eco-conditions has led Save the River to advocate more variability in lake levels, as there once was.

Fault of the Main Assumption: No Evidence Greater Water Level Variability is Better

There is no good evidence that greater variability of water levels will in fact improve the Lake Ontario and St. Lawrence ecosystem:

- 1. Stated Improvements of Plan B+ are Small:** The data of the Final Report shows that the ecological improvements following greater water level variability are almost imperceptible. Increases in muskrat population and the Least Bittern are the leading examples of likely improvement. Yet muskrat populations are not too low, and increases in them are not proven to benefit the ecosystem at large. And the Least Bittern, although a threatened species, is not projected to become extinct in the area due to continued or increased water level stability. To cite minor projected changes in the population of two species as the central reason to favor one plan over another is not to account for the larger overall interests at stake.
- 2. No Proof Greater Variability is Ecologically Better Overall:** There are no clear studies showing that the Lake Ontario and St. Lawrence ecosystem would be healthier *overall* if there is greater variability of lake levels.
- 3. The Past Cannot be Recaptured:** The current ecosystem is greatly altered from what it was a century ago. There are dozens of invasive species currently in the process of making the ecosystem even different from what it is now. So any changes we make now will not restore that ecosystem to anything like what it was then.

Therefore, there is **no good environmental reason to think that Plan B+ is significantly better in any meaningful overall sense than Plan A+**, the leading contender for implementation. I would appreciate your sharing this reasoning with the International Joint Commission.

Sincerely, 
Raymond S. Pfeiffer, Ph.D., Professor of Philosophy

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