

<b>IJC / CMI OTTAWA</b>
ACTION: <i>McDuley</i>
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Thousand Island Park, NY

September 6, 2006

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

Subject: International Study: Lake Ontario - St Lawrence River

Dear Commissioners,

I am writing to encourage your selection of Plan A+ and in opposition to Plan B+.

I am one of many 1000 island summer residents. My Canadian cottage is on a 10 acre parcel with over 1,000 feet of shoreline of which approximately 25% is a marsh/wetland (picture attached). I have strong interest in:

- the overall environment including my marsh lands
- my shore docking facilities, the only means of accessing my property
- boating... recreational boating but more important, use of motor boats to access my residence for all daily living activities.

I purchased my first motor boat in 1950, maintain my US Coast Guard 'Captains' License, and have extensive boating and shoreline dock building/management experience before the Seaway and since.

The study rightly concludes that Plan A+ is the best overall economic plan and specifically that Plan A+ is best for boating by reducing exposure to low water risks (Final Report page 63). Plan A+ is also the best for managing the shore docking facilities which are fundamental to any use of the island property and in avoiding the significant costs and inconvenience of installing catwalks over flooded docks in high water years and dock extensions required in low water years that characterized the years before the Seaway and that would result from Plan B+.

The environment topic, on the other hand, is too complex to provide such a simplified set of conclusions that address the depth and breadth of the topic. Over 400 performance indicators were established for assessing impact of water levels but due to complexity, a subset of less than 10% could be evaluated of which seven were evaluated for the 1000 islands area. Some initial complex mathematical spreadsheets had to be replaced with simplified algorithms. The field studies had a

duration of two or three years and there is uncertainty associated with extrapolating the environmental response to a 50- or 100- year period (Annex2, page 34). Also, uncertainty about outcomes is a constant aspect of the management of complex ecosystems and the mathematical relationships used to predict outcomes are only hypotheses based on a limited period of research (Annex2, page 34). Therefore, conclusions have to be evaluated with this level of uncertainty and they address only a small subset of the overall topic of our environment.

Of more concern, we are facing external environmental challenges of epic proportions which were not included in the evaluation framework. For example, non-native cormorants have devastated the fish environment to a far greater extent than any impact water levels could possibly have. And we must manage our water levels in response to climate change, not by ignoring it.

- "Lake Erie's water level could fall by as much as 32 inches by 2050, due to changes in global climate, according to the latest estimates by Environment Canada, driving sweeping changes through the region's environment and its economy." (The Buffalo News, Aug 29, 2006)
- "Great Lakes drain away: Light snowfalls, dry summer leave Lakes Michigan, Huron near historic low levels." (Chicago Tribune Sept 3, 2006)

In the 1000 Islands the difference between "ideal water level" and "minimum water level" for recreational boating is only 1.4 feet (Table B-2, Annex2). A climate driven water decline of 32 inches (2.7 feet) added to Plan B+ provisions for variations of over 5' would:

- drain my marsh permanently, not preserve or revitalize it (picture attached)
- eliminate the usability of most of my existing shore docking facilities
- expose a very unsightly rocky river bottom turned into shoreline in front of my cottage
- eliminate my two primary boating routes to Gananoque for my daily living requirements

Many cottagers who today cannot use their cottages by mid September due to low water would have major and permanent property usability problems and their property values would fall. Over the past 20 years there has been a major shift in the real estate tax base to island properties. As some islands become less usable, values will fall and the tax base will shift back to the mainland properties.

What is needed is a water levels plan that attempts to maintain our minimum water levels in the face of major external trends. When low water years appear, do we assume they are just part of normal periodic swings or do we assume it is a part of the long term forecasted trend to lower water levels that can devastate the environment as we know it? We can't gamble. If we want to save the river environment, we must hold back and conserve every bit of water in low water years, rather than letting it drain away with an unsound assumption that its just part of a

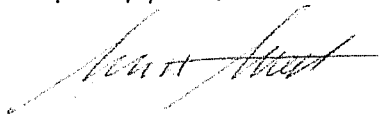
periodic "natural" swing in water levels. Plan A+ is the plan that attempts to manage/preserve our existing shorelines. And if the system is overwhelmed by climate change induced water level reductions, Plan A+ will not exacerbate the low water effect as Plan B+ would.

In summary

- For boaters, the study clearly defines A+ as the best plan
- For island property owners whose property is only accessible by water at its shoreline docking facilities, Plan A+ is clearly the best plan as it maintains the usability of fixed docking facilities and of the shore platforms/ramps to floating structures. The prime season periodic low water characteristics of Plan B+ would be costly in dollars and reduced usability.
- For marsh/wetlands owners with interests in the overall environment, the study gives less clear direction due the complexity of the topic, the subset of the topic that was evaluated, and the uncertainties documented in the study regarding the analytical hypotheses. But as we look to the future, we may question the degree of climate induced water level decline, but we can't hide from the universal outlook that there will be declining water levels and this entire concept was not included in the study. A plan to take us back to a water regime closer to 1950 is not responsive to maintaining our environment given the challenges leading up to 2050.

One last comment. The report states that recreational boaters of the 1000 Islands have preferred Plan B+, willing to forgo the advantages of Plan A+ in trade-off for the advantages of Plan B+ for the environment. People with those views do not represent the majority of island residents or recreational boaters. They've been successful in a major lobbying campaign to get many form letters blindly mailed to the IJC. Contrast those letters with the thoughtful ones written in support of Plan A+. Its important to know that the largest organization representing island property owners, recreational boaters, and businesses on both the Canadian and US side of the 1000 Islands is the Thousand Islands Association and they have come down strongly for Plan A+ and in opposition to Plan B+.

Very truly yours,



Robert H. Street