

July 7, 2008

Ms. Irene Brooks, U.S. Chair  
International Joint Commission  
2401 Pennsylvania Avenue, NW  
Fourth Floor  
Washington , DC 20440

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Dear Ms. Brooks:

I am writing you, at your invitation, to provide a comment on the IJC's Plan 2007 water regulation plan for the Great Lakes and the St. Lawrence River.

I recently attended your meeting at Alexandria Bay, New York and heard all of the comments in support of the B+ option. I thought the comments by Mr. Steve LaPan, representing New York State Department of Environmental Conservation, were very important because they present a big dilemma for you and the IJC Board.

The foundation of your proposed Plan 2007 is shaky, to say the least. In the guide you handed out at the meeting it states that Plan 2007 will outperform the current operating rules in almost every sector, including the environment (P.8). Yet, Mr. LaPan reported that NYSDEC biologists and other Great Lakes scientists have studied Plan 2007 carefully, but have reached an entirely different conclusion – Plan 2007 is worse than the current regulatory plan.

Ms. Brooks, I cannot see how you and other members of the IJC Board can adopt Plan 2007 before you resolve this disagreement. The IJC Board has the right to make a policy decision, but the Board does not have the right to pick and choose the facts. I suggest the IJC convene a workshop for both IJC and NYSDEC scientists in order to produce a set of model forecasts that they can all support.

As you are undoubtedly aware, there have been too many instances lately where U.S. government officials have altered facts and the science in order to support pre-ordained policy initiatives. I hope that is not the case here in the Great Lakes.

Sincerely,



Clifford P. Schneider

Cape Vincent, NY