



CATARAQUI REGION CONSERVATION AUTHORITY

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File: OPS 5-8

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

Via e-mail: comment@ottawa.ijc.org

Dear Secretary

RE: Cataraqui Region Conservation Authority Comments on the Lake Ontario/St. Lawrence River Water Levels – Proposed New Order and Plan

Staff of the Cataraqui Region Conservation Authority (CRCA) have reviewed the proposed new Order and Plan for regulation of water levels on Lake Ontario and the St. Lawrence River. We thank you for the opportunity to provide the following comments.

The CRCA mandate is the protection and conservation of natural resources within our jurisdiction which includes 250 km of shoreline and over 3,700 ha of coastal wetlands on both Lake Ontario and the St. Lawrence River. We are also major property owners of conservation lands, much of which is coastal. Through our work with watershed management, water quality and quantity protection and evaluation and protection from natural hazards (flooding/erosion/dynamic beaches), the CRCA works directly with many issues that are affected by water level regulation on these two waterbodies.

Staff would like to commend the IJC for the comprehensive analysis of the system that the IJC has conducted over the past years. Much high quality data on the lake and river have been generated through these studies.

CRCA staff have reviewed the Plan 2007 in the context of its impact to natural hazards, natural heritage, water quality and quantity, and CRCA properties. We recognize many of the constraints under which the IJC must make its recommendations. Chief among these that directed the IJC toward Plan 2007 is the concern about erosion on shoreline properties.

CRCA staff support the proposal to separate the Order and the Plan, thus allowing more adaptive management in the future. However, staff do not support the remainder of the aspects of Plan 2007 for the following reasons:

- Plan 2007 has no identification of the threshold at which water levels could be changed from Plan 2007 to Plan B+. To enact Plan 2007 without defined thresholds runs the risk of entrenching Plan 2007, a rigid and unnatural water level regime.
- Plan 2007 does not offer sufficient environmental benefits and continues to degrade the coastal wetlands critical to the health of the regional ecosystem.
- With good planning and mitigation strategy, shoreline erosion concerns can be addressed without limiting the opportunities for improved management of the lake.
- Plan B+ provides more natural water levels which provide significantly more environmental improvement than Plan 2007.

Member of



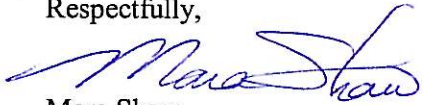
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We note that prior to 2008, discussions regarding erosion mitigation strategies were in progress between the IJC and the New York State Department of Environmental Conservation. These discussions should be reconvened to work toward a solution for shoreline properties. The health of one of North America's largest water bodies should not be diminished by a problem with a readily achievable solution.

Recommendation

Having considered the issues, we strongly encourage the IJC to adopt Plan B+ with a caveat that water managers retain the ability to deviate from the most erosive water levels until mitigation is sufficiently underway. (We note that this threshold must still be defined). Mitigation discussions have recently been convened with the Ontario Ministry of Natural Resources and the NYSDEC; we recommend that mitigation discussions be reconvened with appropriate Quebec agencies if they have not yet been. We believe that up-front discussions regarding the cost and implementation strategy for mitigation may result in successful resolution of the shoreline erosion issue. The CRCA offers any assistance we could provide with technical studies or mitigation plans.

Respectfully,

A handwritten signature in blue ink, appearing to read "Mara Shaw". The signature is fluid and cursive, with a large initial "M" and "S".

Mara Shaw
Watershed Management Coordinator