

July 11, 2008

The Secretary, United States Section  
International Joint Commission  
2401 Pennsylvania Avenue, NW  
Fourth Floor  
Washington, DC 20440  
United States

**Re: Proposed New Order and Plan 2007 for Lake Ontario – St. Lawrence River**

Dear Secretary,

As current Chair of the Sodus Bay Watershed Intermunicipal Committee and I am thankful for the chance to share thoughts on the Proposed New Order of Approval and Regulation Plan. Our Committee was recently formed to combine the resources of three municipalities to help cooperatively share in the management of the largest enclosed embayment on the south shore of Lake Ontario, Great Sodus Bay. The first project that the Committee has undertaken is the Great Sodus Bay Harbor Management Plan. Project information can be found at the following website, [www.sodushmp.org](http://www.sodushmp.org).

The Harbor Management Plan is still in draft form, but one section, the “Inventory and Analysis of Existing Conditions” is complete and has been accepted by the committee. According to this analysis there are 40 commercial properties within the towns and the village that would be directly impacted by the proposed change in water level management. As a result, it is my recommendation that any decision to implement the proposed changes in water level management be postponed until further research can be conducted and analyzed in regard to the impact on adjacent commercial properties. This recommendation is partially based on conclusions that have been reached by the review of the Study by the **US National Research Council** and the **Royal Academy of Canada**. These analyses imply that there is insufficient and inadequate information to base such decisions.

If these independent studies are correct and if lake levels are permitted to range outside of the current targets, then it appears that Lake Ontario’s south shore could be faced with a heavy and unbalanced burden associated with implementing either Plan 2007 or Plan B+. Both Plans allow water levels to stray both higher and lower than currently targeted and would impact our local businesses.

I appreciate the amount of time and effort that has been placed into bringing the Lake Ontario – St. Lawrence River Study to its current draft. However, until the analysis of coastal processes is complete and sufficient, which will include specific economic damage figures and associated mitigation measures, I would urge the IJC to NOT adopt the Proposed New Order of Approval and Regulation Plan 2007.

Sincerely,

Bret DeRoo