



June 10, 2008

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

Dear members of the IJC and other interested parties:

I would like to take this opportunity to thank the IJC for all of their hard work and dedication over the past 6 years of this intensive study. The outcome of this process will have a huge impact on protecting our most precious resource that provides essential wildlife habitat and drinking water for millions of residents. The Great Lakes drive our regional economy. A recent report by the Brookings Institute has shown that restoring the Great Lakes will show a 3 to 4 time return on our investment!*

The **Sierra Club – Atlantic Chapter** stands with those calling for the **Plan B+** regulation plan to be fully implemented in the forthcoming **Order of Approval**, planned for release by the end of this year, rather than implementing **Plan 2007** as an interim measure.

Plan 2007 does little to improve the current regulation plan which has significantly degraded the environment for 50 years. Plan 2007 is essentially 1958D with minor changes. We agree with the IJC that **Plan B+ is the “study’s best regulation plan for the environment.”**

Indeed! Plan B+ is a balanced plan that provides economic benefits while restoring a much greater degree of natural variability and ecological diversity. **The result will be healthier wetlands that provide better habitat and are more effective at filtering our drinking water and creating clean shorelines for recreation!**

Plan B+ should be implemented immediately rather than waiting for “future opportunities to move to a more environmentally beneficial plan... if (shoreline) mitigation measures are implemented” as described in the draft Order of Approval.

That time is now! We call on the State Department, the NYS Department of State, the U.S. Army Corps of Engineers, the DEC and State and Federal Officials to work together to develop a **comprehensive shoreline protection plan** (with a specified timeline) to **implement measures to protect the property of shoreline residents.**

We recommend that the **IJC delay the release of its Order of Approval** for up to one year to allow time for this shoreline protection plan to be developed and incorporated into a new regulation plan.

Finally, we call on all stakeholders to help identify financial resources to fund the proactive implementation of these shoreline protection measures. For Plan B+, the cost of shoreline protection is estimated at \$2 million per year. Plan B+ would also increase hydropower generation revenue by over \$6 million annually. A third of this windfall could pay for shoreline protection. In this scenario, all stakeholders would win!

Together, we can implement a lake level plan that works for all of us. **That plan is Plan B+ with an effective, comprehensive shoreline protection plan to protect shoreline residents.**

Sincerely,



Wayne D. Howard
Sierra Club – Atlantic Chapter
Chair, Great Lakes Committee

*The Vital Connection: Reclaiming Great Lakes Economic Leadership in the Bi-National U.S.-Canadian Region.

http://www.brookings.edu/reports/2008/0324_greatlakes_canada_austin.aspx