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8/2/13

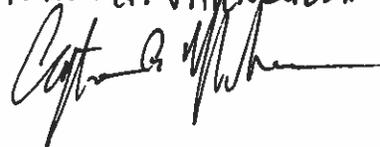
INTERNATIONAL JOINT COMMISSION
SECRETARY, U.S. SECTION
2000 L. STREET, NW, SUITE #615
WASHINGTON, DC 20040

to whom it may concern:

I LIVE IN OSWEGO, NY AND I AM
WRITING TO EXPRESS MY CONCERN FOR THE HEALTH
OF THE COASTAL ENVIRONMENT. SINCE THE WATER
LEVELS OF THE ST. LAWRENCE & LAKE ONTARIO HAVE
BEEN CONTROLLED BY THE I.J.C. AND NOT
ALLOWED TO FLUCTUATE NATURALLY THE WETLANDS &
MEADOW MARSH AS WELL AS WILDLIFE HAVE
DECLINED. I WOULD LIKE MY DAUGHTER
TO HAVE A PLACE TO ENJOY ALONG THE
OSWEGO LAKE SHORE WHEN SHE ~~GETS~~ GETS
OLDER AND THAT IS WHY I SUPPORT THE
EFFORTS OF CITIZENS CAMPAIGN'S PLAN
FOR 2014 WHICH PROVIDED THE OPPORTUNITY
TO RESTORE THE COASTAL ECOSYSTEMS AND IMPROVE
THE HEALTH OF BOTH LAKE ONTARIO & THE
ST. LAWRENCE RIVER.

- THANKS & BE WELL

CAYETANO G. VALENZUELA





Save The River

the Upper St. Lawrence RIVERKEEPER®

Protecting the St. Lawrence River through Advocacy, Education and Research

409 Riverside Drive Clayton, New York 13624

www.savetheriver.org • info@savetheriver.org • 315.686.2010

August 30, 2013

RECEIVED
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BY: *[Signature]*

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Dr. Charles Lawson

Secretary, U.S. Section

International Joint Commission

2000 L Street, NW, Suite #615

Washington, DC

Dear Secretary Lawson:

Save The River, the Upper St. Lawrence Riverkeeper, representing over 4,000 members and followers, submits this letter to express unambiguous support for the International Joint Commission's Plan 2014 for the regulation of Lake Ontario and the St. Lawrence River.

For 35 years Save The River has been the leading advocate for the restoration and protection of the upper St. Lawrence River. We are the only organization whose singular focus is the ecological integrity of the river through which almost 20% of the world's fresh water moves. As the Riverkeeper we strive to ensure that this River, a shared water body in every sense of the phrase, remains swimmable, fishable and drinkable.

Our members and supporters are a diverse group of year-round and seasonal residents, business owners and their employees, visitors, and distant well wishers, all of whom live, play and / or derive their livelihood from the River and share a common desire to protect it. They are all educated about the issues affecting it and are dedicated to the idea that the St. Lawrence is an unparalleled waterway the health and vitality of which is key to the economic health and vitality of the region.

Save The River has been consistent in its call for and support of a modern water levels plan. We have given this task our all as an organization and support Plan 2014 because it is so far superior to what we have had for the last 50 years. We know from peer reviewed scientific research and simple observation that every year the Commission and our federal governments delay a return to more natural levels and flows our River suffers more and greater damage. And when our River suffers so do the species and the people who depend on it.

For 35 years Save The River, the Upper St. Lawrence Riverkeeper has been the leading grassroots advocacy organization working to protect the St. Lawrence River by campaigning to stop aquatic invasive species, fighting winter navigation, and promoting an environmentally friendly water levels plan. Save The River also organizes the water quality restoration and monitoring programs that track River health and identify pollution problems.

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Lee Willbanks

Simply put 1958D has been a slow moving ecological catastrophe for the waterway it seeks to regulate. It has altered the natural ebb and flow of the Lake and River and has devastated significant portions of their coastal habitats. An estimated 64,000 acres of wetlands are now dense mats of cattails with the result that the life is being choked out of them. These impacts to the environment have slowly but radically reduced species diversity. Several marsh birds are now on New York's threatened and endangered species list and the numbers of key indicator species such as Northern Pike have declined by 70%, among many other species that rely on a healthy, diverse ecosystem for survival.

Under Plan 2014 the wet meadow, which has suffered a dramatic 50% reduction due to the unnatural constraints of 1958D, will rebound by at least 40% - improving water quality and enhancing coastal resiliency. Numerous key species, all profoundly negatively affected under 1958D, will see significant increases in their numbers, among them - Northern Pike by 40%, Black Tern by 19%, and Muskrat, a key indicator species, by 259%. A return of species diversity and an increase in spawning opportunities will lead to an increase in hunting, fishing, and birding opportunities as well.

Plan 2014 will achieve these benefits through a return to more natural flows and levels that are neither extreme nor frequent. Many years it will provide a longer recreational and commercial boating season by avoiding the rapid draw down of the Lake and River in the fall. During periods of low supplies and thus lower levels there will be restoration of natural barrier structures, a key component in coastal resiliency.

There are no other measures which can realistically be pursued to restore coastal wetlands to the extent that will be achieved under Plan 2014. There have been efforts throughout the basin to use mechanical means to clear cattail choked wetlands and return at least a portion of them to wet meadow. They have proven expensive and complicated, having to be undertaken in carefully monitored times and conditions. Without more natural levels and flows many will return in time to dense cattail monocultures. Mechanical restoration of even a small portion of the 64,000 acres of wetlands currently lost will be both expensive and time consuming and is not feasible in an era of constrained financial resources.

We can be fairly certain that some things will not change regardless of the water levels plan - 1958D or 2014. Nature will remain variable, and all indications are it will continue the recent trend to greater variability, with more intense storm events and more extreme swings in precipitation. Man made structures built in proximity to this large, complex and dynamic body of water will continue to be impacted by fluctuations and natural events as they have been under 1958D.

When 1958D was adopted the possibility of increasing variability in nature was not contemplated, and certainly not the frequency and intensity of events that have occurred recently. 1958D has no mechanism and does not offer the opportunity for adaptation and resilience that Plan 2014 does and which current and future conditions will require. The adaptive management component of Plan 2014 will do what 1958D never can, which, as the adaptive management plan states, is to "take advantage of future scientific and management advances to assure that the

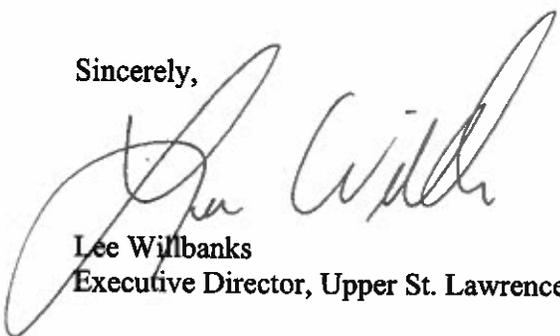
impacts of regulation are those which have been calculated and to adjust for possible long term changes in the amount of water entering the system.”

Finally, Save The River is committed to working with local communities and landowners to find solutions to the vulnerabilities of the shoreline and to find the funds to implement these solutions. We believe it is within our mission to assist communities with the planning, grant writing and implementation of appropriate green infrastructure to increase resiliency in a manner protective of the environment and economic investments. We will seek opportunities with willing partners to achieve these goals.

In the River region our economy is directly tied to our environment. Plan 2014 will improve both. It was formulated over the course of ten years with the input of more than 180 stakeholder representatives, experts, and scientists from government agencies, academia, NGO's and industry in New York, Ontario, and Quebec and has now been subject to an exhaustive public review and comment process. It is clear that a diverse coalition from every region of New York state and beyond strongly supports Plan 2014 as it will increase the overall health of coastal habitats, the species they serve and provide greater economic opportunities for the people who depend on them.

Those of us who live, work, play, visit and love the River believe it can be restored and believe the Commission and our federal governments must act to implement Plan 2014 now, because all of us - riparians, non-riparians, boaters, paddlers, hunters, anglers, birders and those who simply want to leave a healthy, vital and thriving River to the generations that follow – have a place on the water.

Sincerely,



Lee Willbanks

Executive Director, Upper St. Lawrence Riverkeeper

cc: Lana Pollack, Chair International Joint Commission of Canada and the United States
Joseph Comuzzi, Chair International Joint Commission of Canada and the United States
Barack Obama, President of the United States of America
Steven Harper, Prime Minister of Canada
John Kerry, Secretary of State
John Baird, Minister of Foreign Affairs
Leona Aglukkaq, Minister of Environment Canada
Andrew Cuomo, Governor of New York State
Kathleen Wynne, Premier of Ontario
Pauline Marois, Premier ministre du Quebec
Charles Schumer, Senator, U.S. Senate
Kirsten Gillibrand, Senator, U.S. Senate
Bob Runciman, Senator, Parliament of Canada
Chris Collins, Congressman, U.S. House of Representatives
Richard Hanna, Congressman, U.S. House of Representatives
Dan Maffei Congressman, U.S. House of Representatives
Bill Owens Congressman, U.S. House of Representatives
Louise Slaughter Congresswoman, U.S. House of Representatives
Gina McCarthy, Administrator of the Environmental Protection Agency
Nancy Sutley, Chair of the White House Council on Environmental Quality
Joe Martens, Commissioner Department of Environmental Conservation
David Oraziotti, Minister of Natural Resources
Martine Ouellet, Minister of Natural Resources



Name: Susan R. Williamson Date: 7-21-13

Organization: _____

E-mail: srwilliamson@att.net

Mailing address: 8660 Greig St
Sodus Point NY 14555

COMMENTS

Plan 2014 is simply a BAD PLAN!
The effects on personal property,
business, infra-structure would
be immeasurable!

Plan 2014 totally violates the
treaty between the US and
Canada of 1909.

I can't believe we are even
having this discussion again!
How can we sit back and
have you totally destroy our
home and community? I hope
you conscience will guide you

YOUMANS
252 GREENE POINT RD.
MANNVILLE, NY 13661

IJC / CMI OTTAWA
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August 21, 2013

Bernard Beckhoff
Public Affairs Advisor
International Joint Commission
234 Laurier Ave. West
22nd Floor
Ottawa, ON K1P 6K6
Canada

Re: Comments on IJC Water Level Control Plan 2014

Dear Mr. Beckhoff:

I am writing to voice my concerns, and make suggestions, regarding Plan 2014, as prepared by the International Joint Commission for the control of water levels on Lake Ontario. I am pleased that there were changes made to Plan Bv7; these changes move in the right direction of helping the environment, and minimizing potential flooding damage to dunes and properties along the eastern shore of Lake Ontario.

However I have two remaining concerns that should be addressed:

1. Plan 2014 still allows for higher high water levels than the current plan. This action would have severe economic impact to many areas on the eastern and southern shores of Lake Ontario. The property damage to homes and businesses would be immense, probably much greater than that forecast by the IJC. The damage will require new seawalls, building relocations, marina changes and flooding repairs.
2. Plan 2014 does not adequately evaluate the impact of storm surges for eastern Lake Ontario. A storm surge will bring as much as 17" of additional water height temporarily into eastern Lake Ontario. This additional storm water and associated severe wave action, combined with the higher high water levels will cause even further damage to residential and business property and natural dunes and marshes. The North Country of New York, already economically depressed, relies heavily on summer tourism; the damage under the new plan would reduce tourism by destroying the natural beauty that people come to enjoy.

I applaud the IJC for making the modifications to Plan Bv7 that result in Plan 2014. But I ask you to consider some additional changes that will address the concerns about property and dune damage in high water years with storm surges.

Change #1: Lower the high water triggers of Plan 2014 to reflect 5% (not 2%) exceedence frequency. This was done with the low water triggers (set at 95% exceedence level), so it should be possible to do

that with the high water triggers. This is particularly important in the high water months of May, June and July. So as an alternative you might consider keeping the triggers at 2% exceedence for all months except May, June & July and then setting the triggers at 5% exceedence for May, June & July.

Change #2: Give the Board the ability to anticipate a short term trigger. Certainly with the forecasting you have available, you should be able to predict that trigger will be hit. For example, if there is an inordinate amount of rainfall in May, and the May water level is just below a trigger, it would be prudent for the Board to act like the trigger had been hit in making its recommendation for June control. I realize this is difficult to write into the “rules”, but it is how a reasonable person would act. This change will help improve the reaction time to high water levels.

Change #3: Require the Board to act if the triggers are hit. My reading of the proposed rule is that the Board has the choice to act if the triggers are hit; they are not mandated to act. There is too much at risk to allow the Board to deliberate for a while; this change to mandate action will also help improve the reaction time to high water levels.

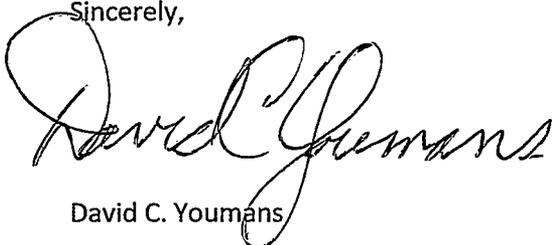
Change #4: Be sure the Adaptive Management Strategy is articulated well and funded and able to act quickly. It should quickly address the impact of (high water level plus storm surge) damage to property, and be given the ability to adapt quickly so multiple flooding events do not occur year after year. Waiting 5 years to get enough data to make an adaptation just isn’t prudent, especially if there is significant flooding and damage in the first or second year.

My family has been property owners on North (Sandy) Pond on the eastern shore of Lake Ontario for almost 70 years; I have witnessed the destruction of high water and storm surges. If the IJC was following Plan 2014 for 2011, my property would have been flooded three times, probably necessitating reconstruction of a seawall and increased shoreline protection. A large number of my immediate neighbors would be in the same situation, and some would lose their whole residence.

I also have partial interest in a beach property on eastern Lake Ontario. This area is well-known for its fine sand, beautiful dunes and natural habitat, including habitat for some endangered species. The sand dunes are a strong tourist and summer resident draw for the area. These dunes also act as a protective barrier to a large number of in-shore properties. Under Plan 2014, a single high water storm will quickly erode hundreds of feet of this fragile environment, potentially destroying the habitat, tourism and protective barrier; these dunes do not naturally rebuild for decades.

So, once again, I urge the IJC to further refine Plan 2014. Please do not let the high waters under this plan destroy a wonderful area of New York. If you would like to have more details of the potential damage of Plan 2014, please e-mail me at dcyoumans@hotmail.com.

Sincerely,

A handwritten signature in black ink that reads "David C. Youmans". The signature is written in a cursive, flowing style with a large initial 'D'.

David C. Youmans