



# Save The River®

Upper St. Lawrence RIVERKEEPER®

*Protecting the St. Lawrence River through advocacy, Education and Research since 1978  
...now and for generations to come*

**PRESIDENT**

Jeff Garnsey  
**VICE-PRESIDENT**  
Lauran Throop  
**SECRETARY**  
Rick Gregware  
**TREASURER**  
Jack Butts  
**PAST PRESIDENT**  
Bill Grater

**BOARD OF DIRECTORS**

Jessica Jock  
Cicely Johnston  
Diane H. Leonard  
Robin Lucas  
Heather McNally  
Ann Ward

***DIRECTORS EMERITI***

Bud Ames  
William Danforth  
Teddy McNally  
J. Richard Munro  
Tricia Tague

**UPPER ST. LAWRENCE  
RIVERKEEPER &  
EXECUTIVE DIRECTOR**

John Peach

409 Riverside Drive  
Clayton, New York 13624  
(315) 686-2010  
email: [info@savetheriver.org](mailto:info@savetheriver.org)  
[www.savetheriver.org](http://www.savetheriver.org)

July 1, 2019

Thousand Islands Sun  
P.O. Box 277  
Alexandria Bay, NY 13607

Dear Editor,

Save The River's Executive Director, John Peach, issued the following statement regarding Plan 2014 to the International Joint Commissioners on Friday, June 28 during their visit to the St. Lawrence River. A roundtable discussion was held after the commissioners toured the River by boat to view steps taken by business owners to combat the high water, as well as the historically significant muskie and northern pike breeding area of Grindstone Island's Flynn's Bay.

**History of Support for Plan 2014**

Over the course of many years, Save The River helped lead the effort to address the shortcomings and damage created by the previous water level management plan. We were joined by our partners at The Nature Conservancy, Audubon New York, Ducks Unlimited, Citizens Campaign for the Environment, Ducks Unlimited Canada, World Wildlife Foundation Canada, and American Rivers.

As many of you know, this team's efforts in support of Plan 2014 were further bolstered by: over 36,000 written expressions of citizen support, letters from 59 environmental, conservation and sportsmen organizations, letters from 39 businesses and community leaders including the Business Council of New York, and 21 municipal and county resolutions

**Description of Current Situation**

Across much of the United States we are now experiencing significant flooding brought on by extraordinarily high precipitation that impacts all portions of our watershed, especially the lakeshore where homes and properties were constructed within the flood zone. In light of this disruption, several points are important to remember:

First, the Lake Ontario and the upper St. Lawrence River coastline would have seen similar water level increases under the previous management plan, 1958D. We know this because of the monitoring data collected by the IJC and its partners.

*Save The River envisions a healthy Upper St. Lawrence River that provides safe drinking water, is home to a thriving range of indigenous species, and supports sustainable economic activity.*



# Save The River<sup>®</sup>

Upper St. Lawrence RIVERKEEPER<sup>®</sup>

*Protecting the St. Lawrence River through advocacy, Education and Research since 1978  
...now and for generations to come*

Enhanced monitoring is a key element of Plan 2014 and the basis for any Plan adjustments that may be called for.

Second, Plan 2014 is actually a more robust plan and allows for deviations during episodic changes we see today. For example, throughout the late summer and fall of 2018, flows were almost certainly higher than they would have been under the previous plan. The rules and provisions of Plan 2014 enabled setting and maintaining recent record or near record outflows.

Third, restrictions on releases under both plans seek to balance the interests of the watershed's ecology, Ontario lakeshore, upper St. Lawrence River, and the lower river shore. This includes areas like Montreal that are prone to flooding, too.

And finally, to reemphasize a most important point, the differences between Plan 2014 and the previous plan are not the cause of recent historic high-water levels.

## **Key Facts Supporting Plan 2014**

As the IJC contemplates reacting to the significant short-term rise in water levels we must not lose sight of one clear fact: ***The science continues to support Plan 2014 and the long-term benefits it provides.*** This includes:

### **The Wet Meadow**

The wet meadow is a major component of coastal wetlands, and its status tells us a great deal about the condition of the wetland ecosystem as a whole. The old water management plan reduced wet meadow acreage by 50%. Plan 2014 is projected to increase wet meadow acreage by 40% from those seen under 1958D.

### **Northern Pike**

Northern Pike is one of the top predators in coastal marshes. Their reduction affects the entire food chain and ecosystem. The old water management plan reduced Northern Pike populations by 70%. Plan 2014 is projected to increase Northern Pike populations by 39% from those seen under 1958D. Our partners at SUNY ESF report they have already seen significant increase in natural reproduction of Pike.

### **Black Terns**

Marsh-nesting birds like Black Terns depend on diverse marshes interspersed with open water for nesting. New Yorkers spend \$660 million each year on trips within the state for wildlife viewing. The old water management plan reduced Black Tern populations by 80%. Plan 2014 is projected to increase Tern populations by 16% from those seen under 1958D.

*Save The River envisions a healthy Upper St. Lawrence River that provides safe drinking water, is home to a thriving range of indigenous species, and supports sustainable economic activity.*



# Save The River<sup>®</sup>

Upper St. Lawrence RIVERKEEPER<sup>®</sup>

*Protecting the St. Lawrence River through advocacy, Education and Research since 1978  
...now and for generations to come*

Plan 2014 also includes significant economic benefits for New York State.

## **Recreation and Economy**

Plan 2014 extends the recreational boating season by several weeks into the fall. This is critical for our local economies.

In fact, healthier Lake and River wetlands support stronger populations of native fish and wildlife, improving the area's hunting, angling, and wildlife-viewing opportunities. The Nature Conservancy estimated economic benefits from Plan 2014, just from improved wildlife recreation, of \$4.0 million - \$9.1 million per year for the immediate river economy.

## **Hydropower**

Hydro-electricity production increases by a projected \$5.3 million a year under Plan 2014. This low-cost power supports jobs in New York State.

## **Shoreline Resiliency**

Compared to the cost of protecting properties from erosion and flooding under unregulated conditions, Plan 2014 is estimated to save property owners on the lake \$25.2 million dollars a year. This may be \$2.2 million less than savings under the previous plan, but the figure remains very significant.

## **Conclusion**

Save The River supports the River's environment through scientific research, education, and advocacy. The science resulting from a six-year, \$20 million study clearly supported Plan 2014. The Plan includes an adaptive management process but recognizes that the environmental benefits to the Lake and River may take up to 15 years to be achieved, a short time to turn around generations of environmental damage.

Any modifications to Plan 2014 should be made based on facts, not emotion. We ask that as Commissioners listen to residents' concerns about water levels, that they ask for facts that support the assumption that Plan 1958 would do a better job than Plan 2014 controlling the high water.

We ask that the Commissioners have their technical staff run a simulation of 2019's conditions using the criteria of Plan 1958D and make the results of the simulation available for public review.

*Save The River envisions a healthy Upper St. Lawrence River that provides safe drinking water, is home to a thriving range of indigenous species, and supports sustainable economic activity.*



# Save The River®

Upper St. Lawrence RIVERKEEPER®

*Protecting the St. Lawrence River through advocacy, Education and Research since 1978  
...now and for generations to come*

We also ask that the IJC Commissioners recognize the following resolution in support of Plan 2014:

*“Save The River will defend Plan 2014 - In 2016 Save The River achieved a decades-long goal when the U.S., Canada, and the International Joint Commission approved Plan 2014, a modern water levels plan, for Lake Ontario and the St. Lawrence River. In order for the Plan to achieve the many environmental and economic benefits its implementation will bring, Save The River must continue to vigorously defend it. Save The River will continue to participate in the adaptive management process set out in the Plan to ensure its projected benefits are achieved and unforeseen, but mitigable impacts, are addressed based on sound science and sound principles of sustainability.”*

Save The River asks that the International Joint Commission continue Plan 2014 and its adaptive management process as long as sound science and sound principles of sustainability determine Plan 2014 is the right water levels management plan for Lake Ontario and the St. Lawrence River.

We recognize that residents of Lake Ontario are suffering the ill effects of the extraordinary snowmelt and rainfall of 2019, just as they did in 2017. But please remember that we on the St. Lawrence River are suffering equally. Many of our businesses are underwater. Those businesses must face the added burden of lost sales in what is always a short season at best. Many of our residential properties are underwater. Homeowners are contemplating making the same repairs they made in 2017. The river is suffering. Tourism is down. Spending is down. Housing sales are depressed. And yet, the river community supports Plan 2014.

Sincerely,

Jeff Garnsey  
President, Save The River's Board of Directors

*Save The River envisions a healthy Upper St. Lawrence River that provides safe drinking water, is home to a thriving range of indigenous species, and supports sustainable economic activity.*