



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.*

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February 23, 2022

John P Petrilla
Environmental Branch Chief, Acting
Border Patrol & Air and Marine PMO
U.S. Customs and Border Protection

Sent via email: BPAMNEPA@cbp.dhs.gov

Dear Mr Petrilla,

Save The River Upper St. Lawrence Riverkeeper® strongly objects to Customs and Border Protection's application to build the US Customs and Border Protection Facility in the Blind Bay area at Fisher's Landing, Town of Orleans, NY.

Blind Bay has open and protected wetland areas. It has served as a long-term aquatic habitat research site monitored by the Thousand Islands Biological Station (TIBS). **Blind Bay has been one of the most prolific muskellunge spawning areas in the region and has been monitored since 1990.** St. Lawrence River muskellunge have experienced a significant and recent decline due to losses associated with viral hemorrhagic septicemia (VHS). Maintenance of high quality spawning and nursery habitat is critical to ensuring population recovery and sustainability. Other important fish species at the site are small and largemouth bass, northern pike, yellow perch, black crappie, bluegill, pumpkinseed, and bullhead; **53 fish species have been recorded at this location.** In 2021, seining conducted by TIBS captured young-of-year muskellunge, northern pike, large and smallmouth bass as well as NYS endangered pugnose shiner. Other NYS Species of Concern and Species of Conservation Need in the Blind Bay record include: American eel; blackchin, blacknose, and bridled shiner; Eastern musk turtle; and map turtle.

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- **The eastern interior of Blind Bay has been largely unaffected by development and serves as a highly productive area for fish and wildlife.** Critical habitats in shallow bays support fisheries, are considered biological hotspots, and support numerous ecological services including shoreline protection, flood reduction, biodiversity, and recreational opportunities including hunting, fishing, birdwatching, and nature education.
- Blind Bay is highly biodiverse. **Blind Bay is a muskellunge spawning and nursery site being used in a recovery effort to restore populations impacted by habitat loss, invasive species, and disease.** Habitat loss and alteration of these sites risks negative impact on biological productivity.
- Diverse aquatic vegetation found in Blind Bay is known to serve as critical fish habitat. **Loss and alteration of aquatic habitat leads to reduced fish production and can impact recruitment of sportfish to local populations ultimately impacting fisheries.** Healthy fish populations and fisheries are important to the regional economy.
- **Dockage areas proposed will require extensive dredging to be functional.** This will damage critical habitat and disturb native sediments. Structures such as docks are known to attract invasive species; zebra and quagga mussels settle on hard surfaces, tubenose and round goby populations may increase. It is known that round goby harbor VHS.
- **Riparian vegetation known to protect shorelines in storm events and serve as critical habitat for birds will be cleared.** Sensitive birds that use this area will receive frequent disturbance. Bald Eagle, Green Heron, Great Blue Heron, Osprey, Belted Kingfisher, and waterfowl species are known to roost and feed in this area. There may be numerous other species impacted including secretive marsh birds.
- This proposed site is adjacent to a Thousand Islands Land Trust preserve that provides refuge to many important native species which will be disturbed by the excessive lighting and activity caused by the operation of the new facility.
- Most of the 18.9-acre site will receive development and habitat conversion to hard impacted surfaces. **This will increase surface runoff to the river and non-point source pollutants.** Numerous harmful compounds are associated with the density and types of activities proposed. Scale of impact relative to the area is disproportionately high.

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For all the reasons listed above, Save The River objects to the Blind Bay proposal, and urges the relocation of this project to a less environmentally sensitive site.

Save The River's mission is to restore, preserve and protect the Upper St. Lawrence River now and for generations to come through advocacy, education, research, and stewardship. I am available for questions on Save The River's position at executivedirector@savetheriver.org or 315-686-2010.

Sincerely,



John Peach
Executive Director
Upper St. Lawrence Riverkeeper

CC:

Representative Stefanik
Representative Jacobs (incumbent)
Senator Schumer
Senator Gillibrand
Senator Ritchie
Assemblyman Walczyk
Councilman Phil Reed
Lloyd Withers, Thousand Islands Park
Jake Tibbles, Thousand Islands Land Trust