



GREAT LAKES COALITION

Michigan/Lake Michigan Chapter for Shoreline Preservation

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November 1, 2019

International Joint Commission
1717 H Street, N.W., Suite 835
Washington, DC 20006

Dear Commissioners:

The Great Lakes Coalition for Shoreline Preservation (GLCSP) is an alliance of several thousand shoreline property owners and other interested parties who are concerned that high lake levels and the accompanying shoreline erosion threatens the very existence of our homes and properties. These near-record lake levels have also resulted in many closed Great Lakes' public beaches, flooded marinas, and extensive municipal infrastructure issues.

Our members were shocked and dismayed to see that the Corps of Engineers Monthly Bulletin of Lake Levels for April 2019 predicted that the level of Lake Michigan would be about half a foot higher this summer than it was a year ago. However, this summer levels rose to 582 feet, more than a foot higher than last summer. Indeed, the level has been above the "Emergency Preparedness Plan-Action Level of 580.0 feet," cited on page 67 of the IJC "Level Reference Study" issued March 31, 1993, for quite some time. In fact, summer levels have been about a foot (!) above the emergency level.

Lake Michigan water level is up 3" since September when it should be going down. Lake Superior is up .3 feet from a year ago; however, Lake Michigan-Huron is up 1.3 feet for the same period.

At our Annual Membership Meeting held on August 10, 2019 in Holland, Michigan, approximately 300 shoreline property owners were in attendance. They were extremely upset about high water levels and the erosion damage and loss of their property. One person had moved his home, at great personal expense; another said her deck is only 6 feet from the edge of a 50-foot bluff. There were many similar stories and photos.

THIS IS TRULY A CRISIS AND IT IS TIME FOR ACTION! As a first step we believe the inflow to Lake Superior from the Long Lac and Ogoki Rivers should be halted.

We would remind you that on page 74 of the March 31, 1993 "Levels Reference Study," during the last episode of high water, the report says:

"The Board further recommends that the following be implemented in the near future: '...The manipulation of the four major Great Lakes diversions: Long Lac, Ogoki, Lake Michigan at Chicago, and the Welland Canal, during crisis situations, when conditions permit.'" (It's been done before.)

“The Board further recommends that, prior to implementing the manipulations of diversions, the potential impacts within and outside the Great Lakes – St. Lawrence River system of changes to the Long Lac, Ogoki and Lake Michigan at Chicago diversions be determined.”

We respectfully submit that it is long past time to get going on these determinations. We do not understand the apparent reluctance of the Board to do so. If the Board expects its reports to be taken seriously, it cannot continue to duck its own recommendations. To do so leads to the perception that power generation is more important than the interests of other stakeholders. If this is really true, then let's say so and have a discussion about it.

We also contend that the inflow from Long Lac and Ogoki is NOT negligible. The inflow of 6,000 CFS is 8% of the Lake Superior outflow to Lake Michigan. An 8% reduction in Lake Superior outflow would be most welcome.

The GLCSP is aware of the Adaptive Management of lake levels as it has been described by the International Joint Commission. However, we believe it is now time for the Adaptive Management Committee to focus on measures to mitigate current high levels.

Specifically, does the Adaptive Management plan for high water levels on Lake Michigan include the implementation of the emergency measures that the IJC recommended in the December 1993 report, “Methods of Alleviating the Adverse Consequences of Fluctuating Water Levels in the Great Lakes-St. Lawrence River Basin?”

WE URGE THE IJC TO IMPLEMENT THESE MEASURES IMMEDIATELY. They are:

- Restore the Long Lac and Ogoki Rivers in Canada to their original flow channels to Hudson Bay instead of the present diversion of them into Lake Superior.
- Remove the in-fills that restrict flow through the Niagara River.
- Open the Black Rock Lock in Buffalo in order to increase Niagara River flow.
- Utilize the Welland Canal to supplement Niagara River flow.
- Consider increasing the Chicago Diversion.
- Install an ice boom at the head of the St. Clair River to reduce the risk of ice jams.

Additionally, we are concerned about the continuous above-average Lake Superior outflows into Lake Michigan-Huron for the last eighteen months. Has the International Lake Superior Board of Control deviated from the Lake Superior Regulation Plan? If so, why? Are ILSBOC meetings open to the public? Are the minutes available? Could we nominate a shoreline resident for the next opening on the Board?

Our Coalition Vice President, Roger J. Smithe, has submitted a letter to you dated August 12, 2019 asking these and additional questions about the current high water level conditions (copy enclosed). The Coalition and Mr. Smithe would certainly appreciate answers to the questions presented to help us to better understand these high water levels. We are respectfully requesting that the IJC promptly schedule a basin-wide workshop, to which all interested parties would be invited, including news media, to seriously discuss high lake levels and possible responses, with the idea of actually, and promptly, implementing appropriate action in an expeditious manner.

This could be done under the auspices of the Great Lakes – St. Lawrence River Adaptive Management Committee (GLAM) and, hopefully, it would show that, with respect to lake levels, Adaptive Management means more than just monitoring and record keeping.

We would also recommend that the IJC utilize the available predictive resources to keep water levels across the basin closer to the mean level by taking action sooner to minimize sooner the impacts of both extreme high and low levels. The recommendations made in this letter will provide you with the tools to do this.

What specific actions will the International Joint Commission take within the next few months to assure us that everything that can be done will be done, to lower existing levels and avoid higher record setting high levels next year?

Sincerely,

Ron Wilson
President
Great Lakes Coalition for Shoreline Preservation

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Honorable Gary Peters

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Office of the Great Lakes

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