



GREAT LAKES UNITED

STATEMENT OF GREAT LAKES UNITED

On The

**N.Y. STATE DRAFT 25-YEAR PLAN
FOR THE GREAT LAKES**

JULY 23, 1991

The Great Lakes are a treasure of inestimatable value and the decision of New York state to formulate a plan to address the problems and opportunities for this region is applauded by Great Lakes United. As a binational coalition of over 180 member groups dedicated to the conservation and protection of the Great Lakes and St. Lawrence River ecosystem, Great Lakes United believes strongly in the need for a vision to guide state actions within the Great Lakes.

New York is a two state coast. Unfortunately the people of New York sometimes forget about, or place lower priority on, the freshwater coast. The 25 year plan can and does help reinforce the importance of this region and helps build a strengthened commitment to programs to preserve, protect and restore the area. The vision articulated in the plan and developed through these meetings are important building blocks to a comprehensive Great Lakes management agenda.

As the twenty-five year plan points out the problems of water quality, threats to habitat, and water quantity issues all need the attention of the Governor, legislators and the public.

The 25 year plan brings together these concerns into a comprehensive document that should provide a useful guide to action.

While we support and commend the Governor, the DEC, other state agencies, and the Great Lakes Basin Advisory Council for developing this plan, we must stress that the writing of the plan is only the first step - the plan and actions to support it must be implemented.

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Foremost among the needs identified in the plan are actions to eliminate and prevent further toxic chemical contamination of the Great Lakes-St. Lawrence River ecosystem.

Toxic chemicals are and will continue to be a significant threat to the health of the Great Lakes ecosystem unless the programs and policies of New York, the other Great Lakes states, the province of Ontario and the two national governments are modified to prevent toxic chemical pollution.

The philosophy adopted for the management of toxic chemicals in the Great Lakes since 1978 has been "zero discharge". New York, like other states, provinces, and the two federal governments, has not upheld this commitment. The twisted beaks of cormorants, deformities in turtles, and the need for fish advisories are evidence enough that our current dilution approach to toxic chemical pollution does not work. We are extremely concerned that the 25 year plan suggests "begin banning the discharge of persistent toxic substances" and to "make progress" on this issue. The sense of urgency necessary in responding to this problem is not conveyed in the Plan.

Banning of discharges of toxic substances, substitution of toxic chemicals by non-toxic ones, and an overall Toxics Use Reduction Strategy for the state, individual facilities and communities is needed immediately. The adoption of these policies cannot and should not be spread over 25 years. Action is needed now.

The actions we believe are needed are spelled out in detail in two documents which we have appended to this statement. They are; a report prepared by the Canadian Institute for Environmental Law and Policy and the National Wildlife Federation entitled Prescription for a Health Great Lakes; and the initial copy of the Bulletin of Pollution Prevention prepared by Great Lakes United. The front page articles in this newsletter, "The Meaning of Zero" and "Look Out, Here Comes Pollution Prevention" provide details on the programs which must be adopted immediately to achieve the goal of virtual elimination of toxic chemicals from the Great Lakes - St. Lawrence River ecosystem. To do less will result in failure and continued threats to the health of people, wildlife and the entire ecosystem.

Not only must toxic chemicals be prevented from entering the system but they must be cleaned up and remediated. Two important programs are necessary for this to be achieved. The first of these is the strong commitment to the development of Remedial Action Plans. We are concerned that insufficient resources have been directed to this important activity. The Eighteen Mile Creek RAP for example, has not even begun because of resource

constraints.

In addition, it is our belief that a statewide sediment management strategy is needed to address the problem of contaminated sediments. These sediments are a reservoir of contamination and a state program consistent with efforts being developed at the federal level are needed to address them. The attention given to this issue in the Plan seems limited given the importance of this issue.

We agree wholeheartedly with the emphasis placed in the Plan on the need for habitat protection and control of the introduction of exotic species. Shore habitat in New York, as elsewhere, is under intense development pressure and it is essential that development that does take place does not threaten the productive capability of the shore zone. Sensible policies that guide development away from sensitive shore features are absolutely imperative. The pace of coastal development makes it imperative that this issue is addressed immediately. The recommendations of the Governors Taskforce on Coastal Resources should provide the framework for these actions.

Recent efforts by a variety of organizations to weaken federal wetland laws and to prevent the adoption of improved state wetland regulations is cause for significant concern relative to wetland protection. We support the encouragements in the Plan for wetland protection but truly believe there must be a net gain in the quality and quantity of wetlands within New York and not just "no net loss". Strong wetland protection efforts at the state level, coordinated with federal programs, are essential if this important habitat is to be protected. The state can set a positive example for the rest of the country by ensuring effective wetland protection and restoration programs are put in place. We are very pleased that the plan recognizes as well the protection of dune habitat and the importance of access to the lakes. As the plan states, acquisition programs are essential to the protection of these features. A funding program to support these efforts cannot wait for the "long-term".

With respect to habitat protection, we would like to place a special emphasis on state efforts to protect Strawberry Island. While every state and federal agency expresses support for protecting the Island, nothing is being done. Without actions by the state this valuable habitat will be destroyed.

The views expressed in the Plan for preventing introduction of exotic species are welcome. Prevention is clearly the best approach to this problem.

With respect to water quantity issues, we appreciate the sentiments expressed in the Plan. The Great Lakes are a dynamic self regulating system and must be allowed to fluctuate. Great Lakes United does not support building of control structures to

continually manipulate water levels and is adamantly opposed to diversion of Great Lakes water. The suggestions in the Plan for protection from flood damage and water conservation are useful approaches that avoid environmentally destructive and economically disastrous control structures.

We must, as the Plan suggests, see the issues of environment and economy linked. We can and should build upon the incredible natural strengths of the Great Lakes region and protect those strengths for future generations.

In conclusion we must emphasize the importance of New York state leadership on issues related to the Great Lakes. By example, and in multijurisdictional forums such as the Council of Great Lakes Governors, and the EPA Great Lakes Initiative, New York can play a significant role in improving the entire Great Lakes system. The Great Lakes problems in New York cannot be solved without supportive actions taking place elsewhere.

The current discussions in Washington on the Clean Water Act, the Great Lakes Water Quality Initiative, and the IJC Water Levels Study, offer important opportunities for New York to affect decisions elsewhere that can have significant effect in realizing the vision articulated in the 25 year plan. We strongly encourage New York to play a significant role in these activities and to provide leadership around such issues as achieving zero discharge, preventing water diversion, and encouraging non-structural responses to water level fluctuations. The vision articulated in the twenty five year plan for a healthy Great Lakes ecosystem will only be realized if New York undertakes concrete actions that help achieve that vision. The opportunities exist to do so.