



GREAT LAKES UNITED

March 22, 1990

Colonel John Glass
U.S. Army Corps of Engineers
Detroit District
Box 1027
Detroit, MI 48231-1027

Dear Colonel Glass:

This letter is in response to your correspondence of March 6, 1990 asking for comments and suggestions on the proposed annual navigation plan for the Soo Locks.

To begin, I would like to emphasize that we appreciate very much the opportunity to provide input to you before the finalization of a plan for the operation of the locks. Consultation with interested parties prior to decisions being made is an important ingredient in effective environmental management.

As you know, Great Lakes United has, since its inception, been opposed to winter navigation on the Great Lakes and the St. Lawrence River. The reasons for this opposition have been detailed in a variety of position papers and reports. In short, the principle reasons for this opposition are two-fold. First, we are greatly concerned about the impact of ice scouring and other environmental damage caused by the movement of ships through ice. The potential for this damage is particularly acute in narrow channels such as along the St. Marys, St. Clair-Detroit and St. Lawrence Rivers.

The second major concern with respect to shipping throughout the ice months is the increased potential for navigation accidents, and the potential increase in severity of the consequence of an accident because ice conditions would prevent clean-up.

An international organization dedicated to conserving and protecting the Great Lakes and St. Lawrence River"

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Your proposed plan suggests the establishment of a maximum 10 month shipping season through the Soo Locks. We concur wholeheartedly with the following assumptions behind your draft proposal, That:

- Year-round navigation through the Soo Locks is not desired, needed or economically justified.
- Steel, coal and grain in the Great Lakes region are essential parts of the national economy.
- Fish and wildlife habitat of the Great Lakes connecting channels is critical to the environmental/recreational well-being of the region.

You note as well that:

- Weather and ice criteria for opening and closing cause an unpredictable season, which may vary by up to a month.

Your conclusion based on these assumptions is that fixed dates for closing and opening the Locks would "minimize risks to the environment as well as benefit the shipping industry."

While we agree with your assessment that fixed dates will provide industry with an improved ability to plan the movement of goods, fixed dates will not minimize environmental damage unless they are set so as to ensure the shipping season will not be open during the months when ice exists. We appreciate the need for industry to have fixed dates for opening and closing but ice conditions vary from year to year. Dates for opening and closing should err on the side of environmental protection and be set on dates when the likelihood of problems with ice conditions are eliminated to the greatest extent possible.

Your plan appears to set the opening and closing dates at the maximum potential of industry needs and not at the maximum needed to ensure safe and environmentally sound shipping on the lakes. Your final environmental impact statement states clearly "that adverse environmental conditions would occur in the St. Marys River area" as a result of an extended season. Great Lakes United does not accept the need to create this damage and potential environmental harm. We believe that a continuation of the existing navigation season (closed between January 8 (+/- 1 week) -- opening April 1 (+/- 1 week) would still provide industry with the dates it needs to plan effectively but would minimize environmental damage and the potential for environmental damage. As you note, the ice conditions vary year to year. We are concerned that the proposal you have made would allow for opening of the shipping season during a period when the potential exists for ice entrapment of ships in the open water or harbor areas.

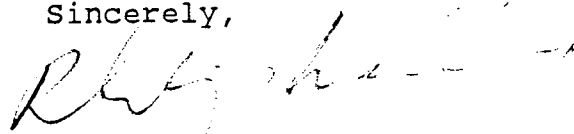
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Maintaining the January 8 (+/- 1 week) closing dates would significantly reduce the likelihood that the shipping season would be open during ice conditions. Similarly, opening the season on April 1 (+/- 1 week) ensures that the ice conditions are of minimal concern.

We believe strongly that the shipping season should be restricted to the greatest extent possible during the ice months. Rather than set lenient opening conditions that industry has not fully demonstrated it needs we suggest setting more restrictive opening and closing dates and establishing clear guidelines for national emergencies for longer openings. These guidelines are necessary to ensure that the season is not extended simply because of poor planning on the part of industry.

In summary, we once again thank you for the opportunity to review the draft. It is our belief that closing and opening dates can be maintained at the more restrictive dates to ensure a high level of protection of the environment without impeding the needs of industry unnecessarily. Clear basis for the national emergency extensions beyond these restricted dates are necessary.

Sincerely,



Philip Weller
Executive Director