CANADIAN ENVIRONMENTAL LAW ASSOCIATION
L'ASSOCIATION CANADIENNE DU DROIT DE L'ENVIRONNEMENT

July 2, 2002
Marc Fortin,
Director, Seaway and Domestic Shipping Policy
Transport Canada
Ottawa, Ontario K1A 0N5

Dear Mark Fortin,

The Canadian Environmental Law Association (Toronto) has worked for over 32 years to protect and restore the Great Lakes ecosystem. We are writing to oppose the provision of Canadian funds being provided to match US funds to the Army Corps of Engineers Great Lakes System Navigation Review.

In April 2002 the U.S. Army Corps of Engineers released a draft report that recommended funding a $20 million feasibility study to evaluate building an 11-metre deep navigation system across the Great Lakes-St. Lawrence waterway. Half of this cost is being solicited from Canada. For the following reasons, we believe that the Corps proposal will be very detrimental to habitat, species and economies dependent on a healthy Great Lakes and St. Lawrence River ecosystem and strongly urge you to withhold the essential Canadian matching funds for the Great Lakes Navigation System review.

- More, larger foreign ships entering the basin would increase the frequency and diversity of exotic species introduced into the Great Lakes and St. Lawrence River. The Lakes, River and dependent economies have already been devastated by exotic species introductions. We need to stop the influx of exotics now, not facilitate more introductions.
- To accommodate Panamax size ships (295x32x9.8metre), the connecting channels, St. Lawrence River and dozens of harbours will need to be deepened as much as 2.9 metres.
- In areas of soft bottom, the channels – including the St. Lawrence, Detroit, St. Clair and St. Mary's Rivers - will need to be widened to as much as 5.8 metres to stabilise the deeper ditch.
- For 295 metre ships to pass through the St. Lawrence River, according to two senior St. Lawrence River pilots, islands bordering the current ship channel will have to be blasted to accommodate the larger vessels.
- The Corps' own report states that dredging to allow a draft of 11 metres could generate hundreds of millions of cubic metres of material requiring placement. Disposing this massive amount of dredged material, especially because of contamination in those sediments, is almost unfathomable.

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- Impacts of dredging hundreds of millions of cubic metres of river bottom include destruction of valuable fish habitat and re-suspension of contaminated sediments into the water column.
- Impacts of operating larger ships include larger surge waves that will increase shoreline erosion, property damage and water turbidity, reduce sunlight penetration, and degrade wetlands.
- Deeper and wider channels will significantly modify the hydrological system by increasing flows through the connecting channels. This would result in lower levels of the Great Lakes upstream of river channels. (Lakes Michigan and Huron have already been lowered by as much as a 1/3 metre overall because of previous navigation projects.)
- If greater amounts of water flow through the system, downstream areas will be at greater risk of flooding wetlands and low-lying shorelines.
- To control this change in water flows, dams and compensating works would have to be installed to hold back the water. The artificial regulation of levels and flows impacts natural water temperature variations and dissolved oxygen concentrations-- two of the most important physical factors influencing all aspects of fish life stages.
- Navigation expansion on the Great Lakes has been considered before, and found to be economically unjustified and environmentally unacceptable. Another study to examine the feasibility of expanding commercial navigation access from Montreal to Duluth is a waste of money and human resources.

Building an 11-metre navigation system from Montreal to Duluth will cost billions of dollars at the expense of the environment and Lake-dependent economies. For these reasons, the Canadian Environmental Law Association strongly urges you to withhold Canadian matching funds for the Great Lakes Navigation System review.

Yours truly,
Canadian Environmental Law Association

Sarah Miller

Sarah Miller
Water Policy Researcher

The Honourable David Collenette, Minister of Transport,
The Honourable Herb Dhaliwal, Minister of Natural Resources,
The Honourable Sheila Copps, Heritage Minister,
The Honourable Robert Thibault, Minister of Fisheries and Oceans,
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