

****Algonquin Eco Watch**Alliance for the Great Lakes**Blue Mountain Watershed Trust Foundation**Brown County Conservation**Council of Canadians- Toronto Chapter**Flint River Watershed Coalition**Freshwater Future**Friends of Wetlands**Great Lakes United**Izaak Walton League of America-Dwight Lydell Chapter**Izaak Walton League of America-Great Lakes Committee**Izaak Walton League of America-Fenton Chapter**Izaak Walton League of America-Minnesota Division**Izaak Walton League of America-Ohio Division**Lake Huron Centre for Coastal Conservation**Ludington Area Charterboat Association**Michigan Charter Boat Association**Michigan Steelhead and Salmon Fishermen's Association**Michigan Wildlife Conservancy**Milwaukee Riverkeeper**National Wildlife Federation**Natural Resources Defense Council**Nature Abounds**Ohio Environmental Council**Old Lily Bay Road Community Association**Salmon Unlimited of Illinois**Save the Dunes**Save the River**Shaker Lakes Garden Club**Southtowns Walleye Association of Western New York**Trollers Unlimited**Trout Unlimited- Illinois Council**Vera Cruz Yacht Club**World Wildlife Federation-Canada****

Project Manager
GLNS – Supplemental Recon.
U.S. Army Corps of Engineers
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Detroit, MI 48226

August 31, 2011

Re: Comment to the U. S. Army Corps of Engineers' 2010 *Supplemental Reconnaissance Report - Great Lakes Navigation System Review*

Dear Project Manager and Project Team:

On behalf of the 34 groups signed below we are writing to provide comment to the U.S. Army Corps of Engineers' Supplemental Reconnaissance Report- Great Lakes Navigation System Review (referred as the 2010 Supplemental Report in this letter), released July 8, 2010.

The signatories to this letter represent a diverse community of interests ranging from environmental, conservation, fishing, boating, and public interest organizations from the eight Great Lakes states and the province of Ontario. We are bound by a common commitment to the health of the Great Lakes and St. Lawrence River. Many of the undersigned organizations have engaged in reviewing and commenting to the Great Lakes Navigation System Review during its decade long evolution, including in formal comment letters to the 2002 Draft Reconnaissance Report to the Great Lakes Navigation System Review, and the 2007 Final Report of the binational Great Lakes St. Lawrence Seaway Study.

First, we are very pleased that expansion is clearly no longer a recommendation of the 2010 Supplemental Report. The removal of recommendations by the U.S. Army Corps of Engineers to further study St. Lawrence Seaway- Great Lakes Navigation System (SLS-GLNS) expansion is a significant step forward in recognizing that physical system expansion is clearly inconsistent now, and in the foreseeable future, with sustainable use of the Great Lakes and St. Lawrence River. **We wholly support the removal of SLS-GLNS expansion options in the Supplement Report. Thank you.**

Please find below specific concerns with the 2010 Supplemental Report:

We remain concerned with the accuracy of Corps' economic forecasting. Prior reports (in 2002 and 2007) of the Great Lakes Navigation System Review and Great Lakes St. Lawrence Seaway Study have been critiqued for a tendency to overestimate benefits of commercial navigation and inflate traffic forecasts. While some progress has been made to perform a more realistic analysis based on the actual use and performance of the system, such as the removal from the 2010 Supplemental Report of the container forecasts previously included the 2002 Draft Reconnaissance Report to the Great Lakes Navigation System Review, questions about the accuracy of forecasting remain. For example, the Corps predict steady increases in all traffic including coal cargo on the system (2010 Supplemental Report, pages 52-54) However, projected increases in coal movement on the system runs contrary to a 2007 legally binding regulation by the government of Ontario to phase out coal-burning at its four remaining coal-fired power plants by December 31, 2014¹. In 2009 Ontario's coal-fired electricity output was at its lowest level in 45 years² and in 2010 four generating units at coal-burning power plants were shut down at the Nanticoke station and Lambton plant in pursuit of this goal.³ We question whether the Corps' coal cargo forecasts have included the projected elimination in coal consumption by the province of Ontario

Additional examples of incomplete considerations are evident in the "Externalities" section (2010 Supplemental Report, page 51) which only quantifies significant increases to the value of the SLS-GLNS due to avoided costs from roadway and train collisions, and avoided health care costs. Clearly this would be the place to quantify the 'negative externality' of ballast mediated invasive species, which is costing just the eight Great Lakes states alone \$200 million dollars a year in costs to raw water users, the commercial and recreation fisheries, and recreation.⁴ Environment Canada has stated that since 1988,

¹ Ontario Regulation 496/07, Ontario Regulation made under the Environmental Protection Act: Cessation of Coal Use – Atikokan, Lambton, Nanticoke and Thunder Bay Generating Stations.

² "Wind Power in Ontario Generates a New Record in 2009" (January 8, 2010)

<http://www.newswire.ca/en/releases/archive/January2010/08/c7170.html>

³ "Four more Ontario coal-fired generating units shut down" Toronto Star (October 1, 2010)

<http://www.thestar.com/news/ontario/article/869588--four-more-ontario-coal-fired-generating-units-shut-down>

⁴ D., Lodge and D. Finnoff, "Annual Losses to Great Lakes Region by Ship-borne Invasive Species at least \$200 Million" University of Notre Dame; University of Wyoming (July 16, 2008)

http://www.glu.org/en/system/files/lodge_factsheet.pdf

estimates of the cumulative impact of the ballast mediated zebra mussel invasion ranges from \$3 billion to \$7.5 billion for the Great Lakes.⁵

We stress the need for all future Great Lakes- St. Lawrence River navigation planning to happen within the context of changing water levels due to climate change. We applaud the recognition of the impact of climate change on the Great Lakes- St. Lawrence River in the 2010 Supplemental Report. However, this recognition is not followed by an analysis or discussion on how the industry could prepare for a potentially enormous reduction of individual vessel capacity due to reduced water levels. Clear adaptive responses to climate change are not reflected in the Corps' proposed recommendations to optimize future system operations and maintenance, the Corps' specific recommendations for individual port deepening, or the Corps' recommendation to binationally study the feasibility of developing the short seas shipping system. In addition, climate change and lower water levels forecasts are not being reflected in future traffic projections, incorporated into transportation cost savings analyses, or projected environmental impacts.

Facilitating commercial navigation operation in a changing hydrological environment is essential to both the industry and ecosystem long term sustainability. The Corps include adequate recognition of the high impacts of climate change, including predictions of permanently lower water levels throughout the SLS-GLNS (2010 Supplemental Report, pages 77-79), but these predictions are not translated into reductions in cost savings due to lightened loads, nor are traffic predictions reduced due to these climate change scenarios. The 2010 Supplemental Report instead poses an optimistic future of increased cargo despite drastically lower water levels without justification that such increases are actually possible in a different hydrological environment. When viewed together, there is substantial reason to question and further investigate the Corps' forecasting

Given the potential magnitude of impact climate change may have on commercial shipping on the Great Lakes and St. Lawrence River, the realistic assessment of climate change impacts and the development of adaptive management strategies must be made a priority in order to maintain vitality of the waterway system and the ecosystem. Such recommendations are glaringly absent from the 2010 Supplemental report.

Please find below specific comments in support of recommendations in the 2010 Supplemental Report:

We support investigating recommendations to address navigational restrictions for the Chicago Sanitary and Ship Canal in conjunction with current Corps' investigations on how to prohibit the movement of aquatic invasive species. The Corps recognizes that infrastructure limitations, such as low bridge air drafts and narrow channels, in the Chicago Sanitary and Ship Canal exist (2010 Supplemental Report, page 96) and

⁵ "An Invasive Alien Species Strategy for Canada" Environment Canada (September 2004)
<http://www.ec.gc.ca/Publications/default.asp?lang=En&xml=26E24C67-2299-4E7A-8014-9FB6B80695C5>

improvements to enhance waterborne trade between the Great Lakes and Mississippi River basin could be evaluated. We would support the examination of such potential improvements if they were specifically developed in conjunction with hydrological separation options for the Chicago Area Waterway System under the Corps' current Great Lakes Mississippi River Interbasin Study.

The undersigned organizations are extremely concerned about an Asian carp invasion to the international waters of the Great Lakes and St. Lawrence River, as well as concerned about the two-way transfer of aquatic invaders between the Mississippi and Great Lakes basins. The GLMRIS study was authorized by the U.S. Congress in 2007 to prevent aquatic nuisance species movement between the Great Lakes and Mississippi River basin⁶. We believe the only permanent and sustainable solution to prevent an Asian carp invasion to the Great Lakes, and the threat of future movement of aquatic invasive species, is the hydrologic separation of the Great Lakes and the Mississippi River basin because if water does not flow between the two watersheds, water-based plants, animals and diseases will not be able to migrate actively or passively. As commercial users on the Chicago Sanitary and Ship Canal have an interest in how the Corps develops hydrological separation options, we recommend that such investigations are performed in conjunction with an evaluation on how to address navigational restrictions on the Chicago Sanitary and Ship Canal.

We support the recommended binational review of Great Lakes Navigation System activities to reduce environmental impacts. In recent years regional and federal leadership has focused and invested heavily in restoring the Great Lakes and St. Lawrence River natural resources. Significantly enhanced protection and restoration is needed because of the recognition that the region is on the brink of losing the vital ecosystem services that the Great Lakes and St. Lawrence River provides. The Great Lakes' abundant wildlife, vast fishery, and diverse ecosystems support thriving industries centered on the lakes' resources. In 2005, the combined industries of fishing, hunting, wildlife watching and boating were estimated to generate over \$50 billion of economic activity each year, as well as hundreds of thousands of jobs.⁷

The U.S. Great Lakes Restoration Initiative was created to provide significant financial resources "to target the most significant problems facing the Great Lakes, and track progress in addressing them. Through this initiative, the Obama Administration has proposed the largest investment in the Great Lakes in two decades."⁸ Consistent with the Great Lakes Restoration Initiative Action Plan recognition that, "not only must we stop current activities that are damaging the Great Lakes, but we must also invest in undoing past damage,"⁹ we strongly support both efforts to restore the Great Lakes and St.

⁶ Section 3061(d) of Water Resources Development Act of 2007. <http://glmris.anl.gov/>

⁷ Great Lakes Collaboration Strategy (December 2005).
http://www.gllrc.us/documents/strategy/GLRC_Strategy.pdf

⁸ Nancy Sutley, "Investing in the Health of the Great Lakes," CEQ Blog, (Sept. 29, 2010)
<http://www.whitehouse.gov/blog/2010/09/29/investing-health-great-lakes>.

⁹ Great Lakes Restoration Initiative, Action Plan FY2010-FY2014 (February 21, 2010)
http://greatlakesrestoration.us/action/wp-content/uploads/glri_actionplan.pdf

Lawrence River ecosystem, as well as identifying ways to alleviate current negative impacts from commercial navigation.

Specifically, we reiterate our 2009 recommendation for a comprehensive examination of potential improvements in the environmental performance of commercial navigation to benefit the people and economies of the Great Lakes- St. Lawrence River region, ensure its own viability, and become a true steward for this spectacular, yet fragile, natural wonder. These are: invasive species prevention; adapting to climate change and lower water levels; cleaning up air emissions; eliminating other discharges including dry cargo sweepings; and minimizing ice breaking¹⁰.

In conclusion, despite the 2010 Supplemental Report's shortcomings of dubious forecasts of cargo increases and the failure to integrate climate change predictions into recommendations for the future navigation system, it is clear that this latest iteration of the Great Lakes Navigation System Review takes a significant step forward by formally rejecting the notion of SLS-GLNS expansion. Further promising is the Corps' recommendation to initiate a binational review to address the decades of environmental damage caused by commercial navigation and protect the precious freshwater resources of the Great Lakes and St. Lawrence River.

The 2010 *Supplemental Reconnaissance Report - Great Lakes Navigation System Review* shows significant progress toward a better future of the Great Lakes and St. Lawrence River, and as articulated above, we thank the U.S. Army Corps of Engineers for formally removing expansion as a recommended option for future study, and encourage continued progress to ensure a sustainable future for the SLS-GLNS, the shipping industry, and the Great Lakes and St. Lawrence River ecosystem.

Please do not hesitate to contact Jennifer Nalbone of Great Lakes United, or Jennifer Caddick of Save the River, if you have any questions.

Sincerely,

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¹⁰ "A Better Seaway: Seven Principles to Guide Sustainable Shipping on the Great Lakes-St. Lawrence River" Great Lakes United (June 2009)
http://www.abetterseaway.com/sites/default/files/abetterseaway_final.pdf

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