



19 Edgcombe Ave.,  
Toronto, Ont., M5N 2X1  
Tuesday April 4, 2001

Mr. Wayne Schloop,  
United States Army Corps of Engineers,  
P.O. Box 1027,  
Project Management Office, 7th Floor,  
Detroit, Michigan,  
48231-1027

Dear Mr. Wayne Schloop,

Re: USACE Great Lakes Navigation System Review

Our organization wishes to comment on the next stage of this Review prior to its release. It is our understanding that the next stage in this Review is to decide what environmental impacts have to be considered if the Seaway channels are to be altered to allow larger vessels to transit the system.

The Georgian Bay Association was formed in 1916 with a mandate "to work with our water based communities and other stakeholders to ensure the careful stewardship of the greater Georgian Bay environment...." We represent 23 local associations along the eastern and northern shores of Georgian Bay. The area is mostly accessible only by water and includes the 30,000 Islands – a rocky Precambrian shield granite shoreline with shallow waters among the islands. Water levels are extremely important to our approximately 4,400 families. The recent low water levels have had a huge impact on the ecosystem at our mainly water-access only properties.

When the Seaway was opened in 1959, environmental impacts were not considered. There was a permanent withdrawal from the middle lakes including Georgian Bay that resulted in a decline of water levels of about 15 inches. This happened in spite of a significant diversion into Lake Superior. With no controls at Lake 's outflow, its levels have historically continued to decline overall significantly as compared to the other Great Lakes. In addition, by placing controls in the St. Mary's River and thereby narrowing the extreme levels, the effect downstream has been to accentuate the high and low levels for Lake Michigan and Lake Huron/Georgian Bay. To our knowledge no impact studies have been carried out to assess that impact and before any consideration can be given to any further changes in the Seaway channels, clearly this impact has to be assessed and compensated for. **We are requesting that compensating structures be put in place at the outflow of**

**Lake Huron to allow for that permanent withdrawal of 15 inches to be regained in water levels.**

The impacts of low water levels for eastern and northern Georgian Bay are probably more significant than in any other part of the Great Lakes. The area includes a very unique ecosystem that is described in a video included with this letter. This video was produced by the GBA Foundation, a charity launched in 1995 to undertake environmental research and education programs. As Dr. Schiefer's video indicates, this ecosystem results in a greater biodiversity of aquatic species than is found anywhere else in the Great Lakes. To protect the area, the GBA Foundation is applying to UNESCO to have it declared a World Biosphere.

The impacts of low water levels have resulted in extensive dredging and blasting mainly in marina basins. (See attached air photos showing fine clay and silt dispersing over wide areas for months and prohibiting use of the water for recreational use or for drinking. The fine silt or clay can pick up heavy metals like lead or manganese and make the water unsafe for human consumption even if boiled. Since no pre-dredging sediment analysis was carried out, the presence of contaminants was undetermined but suspected.)

In addition, the GBA Foundation has begun research on the impacts of low water levels on our wetlands. Low water levels have heavily impacted the few scattered wetlands along the rocky shorelines. (See attached photos.) When a wetland dries up for 3 or 4 years, it takes 10 to 15 years to recover. We have many significant wetlands that have now converted to grassy meadows. At Sandy Island, a large wild rice wetland is now an exposed sand beach. The aquatic life forced out of these wetlands cannot find similar habitat on the steep granite shorelines. Ontario Ministry of Natural Resources Lake Huron Fish Management Unit is expecting low spawning years during these low levels for fish species like northern pike, black crappie and small mouth bass. This in turn impacts bird species like herons and the endangered but slowly returning osprey.

Climate change will have a dramatic effect on the Great Lakes levels and especially in Georgian Bay, where there has been very little ice coverage in the last decade. Historically Georgian Bay usually froze over entirely, thereby preventing the evaporation which now occurs during the entire winter season. Environment Canada is predicting a decline of water levels in Lake Michigan and Lake Huron/Georgian Bay of 100 centimeters over the next 20 to 40 years.

Any activity that would result in a further withdrawal would be devastating to the eastern and northern shores of Georgian Bay. Now is the time to consider and compensate for the withdrawals taken when the Seaway was opened. Until that is completed, no further action can be considered.

**We respectfully request that withdrawals, levels and flows and compensation be part of the environmental studies in the next phase of the Great Lakes Navigation System Review.**

Finally, we are in strong agreement with Great Lakes United's suggestion of a "break bulk" port in the upper reaches of the St. Lawrence River so cargo can be transferred to a Great Lakes shipping fleet that can be scaled to the ecosystem. Georgian Bay has been impacted by invasive species such as Zebra Mussels, with the result that our members now have filters on intake pipes. The invasive round gobi and Ruffle fish species are already furthering the declining native sport fishery of walleye and bass. Last summer, during our benthic macroinvertebrate water quality assessment program, we found the exotic spiny amphipod, *Echinogammarus ischnus*, the first record of it in Georgian Bay. The planned exchange of ballast waters will never completely solve the problem of the introduction of exotic and invasive species. The Review must look at the employment of alternatives that provide benefits to the diverse ecosystems found in the Great Lakes.

We would be pleased to present in person, if that would be helpful, our concerns to you as either a full visual presentation or a tour among the islands and wetlands. Colonel Mark Roncoli of your office and Lt. C. Richard Polo visited our area in June 2001 as part of a Lake Superior Control Board meeting arranged by GBA Foundation, and so they should be aware of these concerns. Marie Strum of your office received our comments at an Upper Lakes Plan of Study Public Meeting and is also aware of these concerns. If we can be helpful to you in understanding our concerns please let us know.

Thank you for your interest in preserving the ecological integrity of the entire Great Lakes system. Please keep us informed of the next stages.

Sincerely,

Mary Muter, GBA VP, Chair GBA Environment Com., advisor GBA Foundation

CC Herb Gray IJC

I will do a separate letter to David Collenette, David Anderson and Bill Graham objecting to Canadian government interests being represented by St. Lawrence Seaway Development Corp