

**Statement by National Wildlife Federation  
Before the  
St. Lawrence County Environmental Council  
May 15, 2002**

The National Wildlife Federation (NWF) commends the St. Lawrence County Environmental Council for holding this public meeting regarding the proposed recommendations of the U.S. Army Corps of Engineers (Corps) to further evaluate the feasibility of deepening the navigation channel in the St. Lawrence River to as much as 35 feet. We respectfully ask that the St. Lawrence County EMC carefully consider the comments of NWF and the many other people here today and that you oppose the Corps' proposal to continue this study.

If ever there was proof that the Corps of Engineers needs reform, the draft Reconnaissance Report of the Great Lakes Navigation System review is it. First, the report declares that the Corps' "basic responsibility ...is to facilitate the movement of boats. ....by deepening, widening and straightening channels, by regulating water levels with dams, and by providing associated locks." Second, the report claims that "primary concerns among stakeholders were limitations on vessel drafts restrictive channels and port depths restrictive locks sizes..." So it comes as no surprise that the draft report concludes there is a "federal interest" for going forward with full feasibility study, estimated to cost \$20 million. This must be what the Inspector General in its investigation of the Upper Mississippi Project had in mind when last year it wrote:

**"The testimony and evidence presented strong indications that institutional bias might extend throughout the Corps. Advocacy, growth, the customer service model, and the Corps reliance on external funding combined to create an atmosphere where objectivity in its analyses was placed in jeopardy."**

NWF believes it is time for the Corps to broaden its definition of who its customers are and consider the interests of those that live, work, hunt, fish, boat, drink, and eat by, in and on the Great Lakes and St. Lawrence River.

The Great Lakes Basin is the largest reservoir of fresh water in the world. Nearly one-third of the population of the U.S. and Canada live within the basin. Tens of millions of people are dependent on clean and healthy lakes for drinking water, a viable livelihood and recreation. The Great Lakes are home to more than 237 species and subspecies of fish, as well as support at least 220 species of birds and 18 species of mammals.

Yet today, invasive species, out-of-basin diversions, global warming, and residue of polluted sediments from long gone industrial facilities threaten these American crown jewels. Digging a 35 feet trench from Montreal to Duluth will only aggravate these threats. We know that deeper channels will result in higher flows and thus, lower lake levels. Previous feasibility studies by the Corps' – studies that rejected the very same deepening of the system the Corps is now promoting – have documented that larger ships create greater disturbance to the aquatic environment. Dredging of channels destroy fish habitat and benthic communities. Extending the navigation season rips streamside vegetation damages docks, and increases risks of catastrophic oil spills. Increased traffic – especially from foreign ports - will increase the probability that more exotic species will invade the Great Lakes.

These issues were identified by NWF, and by more than 100 hundred individuals and groups during comments submitted on the scoping phase of this project, but were virtually ignored in the Draft Reconnaissance Report. Instead, the Corps chose to spend its money creating hypothetical scenarios to prove that an “unconstrained” system would benefit the nation.

The Corps is straining even its own damaged credibility in reaching the conclusions of this report. The Corps' piles unrealistic wishes on top of unjustifiable assumptions, as the basis of this study. The Corps would have us believe that if they deepen the Seaway,

build new locks, extend the navigation season, and get Canadian support, more shipping traffic would result. These wishes are completely unrealistic in light of the overwhelming environmental problems, political opposition and enormous costs that would have to be overcome to make these wishes come true.

The Corps argues that with a 35 foot waterway, the seaway would be able to accommodate 34% the world's fleet capacity, instead of only 13% with the existing locks. Essentially, the "Seaway" would be comparable with the Panama Canal.-The report predicts that with a larger waterway and some winter shipping, by 2060, bulk cargo could grow from 221 million tons to 356 million tons. Container traffic, which today amounts to only 5% of total tonnage through the system, could increase at a 2.9% percent annual growth.

The key words are unconstrained and could. Could means that Panamax size ships would be able to transit the Seaway, but the report provides no proof that they will. As for unconstrained, the Atlantic Ocean is unconstrained. A waterway that consists of hundreds of miles of river channels, three sets of locks, and requires that adverse environmental impacts be minimized will always pose constraints on the Great Lakes-St. Lawrence River. Unconstrained implies that Congress will provided unlimited funding to make Duluth, which is 2,300 miles from the Gulf of St. Lawrence, into a seaport. No matter how much shipping interests may want the Corps to try, the Great Lakes will never be "America's Fourth Coast."

The draft report ignores earlier findings that large scale dredging of the system was economically unjustified. Both the 1987 Connecting Channels and Harbors, and St. Lawrence Seaway Additional Locks reports reached these conclusions, even though they relied on projected increases in traffic that proved to be flat wrong. In fact, because Canada decided that the Welland Canal would not reach capacity until 2030, the Corps recommended no action on the St. Lawrence River. The reconnaissance report, however, does not explain why the earlier reports' findings are no longer relevant. Instead, the Corps argues that if we build a bigger system the traffic will come. Given the Corps

record of failed predictions, we cannot stake the future of the Great Lakes and St. Lawrence River on such “Field of Dreams” scenarios.

Last year, NWF recommended that the present study explore ways to enhance the ecology of the Great Lakes and St. Lawrence River and find ways to make navigation more compatible with other, equally legitimate values and uses of this ecosystem. We suggested that the Corps of Engineers could contribute in a positive and constructive way to restoring some of the ecological damage caused by pollution and the Great Lakes navigation system. The Corps expertise, experience and resources would be welcome assets in addressing the problem of Great Lakes remediation. Cleaning up contaminated sediments, aiding in the war against invasive species, removing concrete seawalls, hardened shoreline structures and impediments to flow, including dams, that have destroyed the habitat and hydrological functioning of the ecosystem are examples of where the Corps expertise and resources would be welcome.

Clearly, this draft report ignores our recommendations. Just as it would appear that the Corps has ignored another request by Congress to take a holistic approach to identifying the water resources needs for the Great Lakes Basin. In 1999, Congress authorized the John Glenn Basin Program to address the future of commercial navigation within the context of other water resources needs. However, the Corps decided to split the navigation study from this broader review. As a result, the Corps has produced a report that is narrowly focused on digging and building. It ignores the efforts by state and federal agencies and concerned citizens to develop a strategy to restore the Great Lakes.

It is time for the Corps to consider a future commercial navigation system on the Great Lakes- St. Lawrence Seaway that is ecologically sustainable. Such a feasibility study would reflect the costs to the nations and region’s economy from invasive species, from lower water levels, from polluted sediments, and damaged fish habitats. It is also time for the Corp to listen to the resource agencies that for 30 years have urged the Corps to support comprehensive biological studies. The Great Lakes belong to all the citizens of Canada and U.S., not just to the shipping interests that the Corps views as its customers.