

## **A NEW THREAT TO THE GREAT LAKES BY THE ARMY CORPS OF ENGINEERS**

My name is Lee Botts, founder and board member emeritus of the Lake Michigan Federation. I am here today on my own behalf as an advocate for the Great Lakes for several decades, inside and outside government.

My purpose today is to call attention to a new threat to the Great Lakes in the efforts of the Army Corps of Engineers to advance unsustainable expansion of the Great Lakes navigation system. The proposal calls for deepening navigation channels, expanding locks and enlarging harbor capacity throughout the system from the St. Lawrence Seaway at Montreal to Duluth. It also seeks to revive the earlier failed concept of maintaining year round navigation by engineering means.

The stated purpose is to allow larger ocean going vessels to traverse the entire system. I believe the real purpose is to maintain Corps' traditional role as builder and operator of waterway transportation. This initiative occurs while efforts are growing inside and outside Congress to adapt the function of the Corps to meet 21<sup>st</sup> century needs rather than to continue the obsolete mission for which it was established in the 19<sup>th</sup> century.

As became increasingly usual for major Corps projects through the 20<sup>th</sup> century, this one is being pursued without real evidence of possible economic benefits and with disregard for confirmed environmental consequences. No evidence supports the assumption that large ships will use the system even with the changes. Yet the Corps wishes to proceed without the independent economic analysis recommended by the National Academy of Sciences and demanded in the legislation to reform the Corps now before Congress.

Meanwhile, the Corps itself is seeking to bypass policy that Congress has previously set for requiring local governments to contribute half the cost of the lengthy and convoluted studies that are the way the agency keeps itself in business. In this case, the Corps is seeking Congressional authorization to allow Canada to pay half the \$20 million dollar cost for its next feasibility study instead of seeking that amount from United States sources. Canada has not agreed to pay even if the Corps request is granted.

My conviction of the need for such independent analysis is based on experience with earlier Corps projects, the Chicago-South End of Lake Michigan project known as C-SELM and the earlier attempt to promote winter navigation. Both collapsed after expenditure of millions of dollars in the face of opposition that demonstrated their folly. Open and real analysis would have revealed the faults of both projects ahead of time.

The C-SELM project in the early 1970s proposed to collect all wastewater effluents in the Chicago metropolitan region between the Wisconsin and Michigan state lines to be pumped 50 miles, sprayed onto farm fields in five counties straddling the Indiana and Illinois state lines in the Kankakee River valley, then collected and returned to Lake Michigan and other waterways. As chairman of the Conservation Committee, I experienced first hand how the momentum of the Corps process required three years of organized opposition to be stopped.

In the early 1980s, I was chairman of the Great Lakes Basin Commission, a regional planning agency charged with coordinating state and federal policies for water

resources, when the previous winter navigation proposal was stopped. Concepts put forward to overcome winter included siting of nuclear power plants where thermal discharges could melt ice as well as more mundane new and bigger ice breakers. The project was ceased following independent economic analysis of the project by the Basin Commission for the Great Lakes states at the request of Michigan Governor William Milliken.

The economic justification for the project the Corps is now proposing is speculated—not demonstrated—to be something over a billion dollars a year and will expand and enhance environmental threats to the Great Lakes. The proposal disregards the immense ecological and costly economic damage that has followed introduction of invasive exotic species in ballast water discharged by ocean-going ships using the St. Lawrence Seaway.

One certainty is that deepening navigation channels will produce millions of tons of dredge spoils whose disposal has continued to be a major challenge for the Great Lakes region for the past 30 years. Further, widespread damage to coastal wetlands is likely owing to the shoreline effects of deepening narrow navigation channels. Already residents of the St. Lawrence region are concerned about the likelihood that the casualties will include islands in the river. Throughout the basin, there is concern about possible enhanced effects on levels of the lakes by increasing flows through the connecting channels.

My statement here concerns only the Great Lakes in matters with which I have first hand experience. The commission should include in its reading list *The Corps and the Shore*, by Oran Piley and Katharine Dixon of Duke University (Island Press, , Washington, D, 1996). This book aims to inform local communities on ocean shores how to protect themselves from destructive engineering projects of the Corps in the name of erosion prevention.

In the Great Lakes basin, our own past experiences with the projects I described and others are the reason that the United States environmental community throughout the Great Lakes basin has already organized to oppose the Great Lakes Navigation System project now rather than later, joined by their counterparts in Canada.

In summary, this commission should address the need for change in the mission and function of the Corps in its recommendations, changes demonstrated in the agency's past and present activities in the Great Lakes as well as elsewhere.

Lee Botts  
Gary, Indiana