



**GREAT LAKES UNITED**

April 2, 1993

Commander  
U.S. Army Engineer District, Detroit  
ATTN: CENCE-PD-EA  
P.O. Box 1027  
Detroit, MI 48231

RE: Draft Environmental Impact Statement,  
Supplement III to the Final Environmental  
Impact Statement; Operations, Maintenance, and  
Minor Improvements of the Federal Facilities  
at Sault Ste. Marie, Michigan (July 1977);  
Opening Operation of the Lock Facilities on  
March 21.

Dear Commander:

Great Lakes United, an international coalition of nearly 200 conservation and kindred organizations within the Great Lakes-St. Lawrence River Basin, continues to oppose the early, fixed date opening of the Soo Locks, at Sault Ste. Marie. We especially oppose a fixed opening date before April 1 and before ice break up occurs in the St. Marys River, an event that frequently happens as late as the third week of April. The proposed opening date of March 21 is also well within the average time of maximum ice thickness on the St. Marys River. The potential dangers from such early operations are well documented by the U.S. Fish and Wildlife Service and the Michigan Department of Natural Resources and we support the conclusions that have been reached regarding the probable damage to wetlands, impacts on larval fish, disturbance of contaminated sediments in Areas of Concern, damage to shore structures and potential worst case disasters due to spillage from tankers.

It is a disturbing fact that the U.S. Army Corps of Engineers has routinely opened the Soo Locks to late winter traffic by March 21 to satisfy the unsubstantiated needs of commerce. This year the Mackinaw and several Bay class vessels moved into the St. Marys River as early as March 17 to conduct a full scale breakout in anticipation of upbound vessels that had left Lake Erie ports on the same day. The breakout occurred nearly three weeks before the deadline for public comments on the Draft EIS which included the March 21 fixed date opening of the Soo Locks as the preferred alternative.

*An international organization dedicated to conserving and protecting the Great Lakes and St. Lawrence River*  
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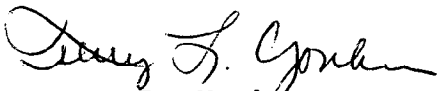
The public is not generally aware that the U.S. Coast Guard routinely maintains winter shipping channels in the St. Marys River below the Soo Locks throughout the period of maximum ice thickness. The channels are kept open year around so that deliveries of heating fuel and chemicals can be made to Sault Ste. Marie, Ontario. Tanker accidents are not unheard of in the Great Lakes. One vessel which transported petroleum products routinely during the winter was the Jupiter. That tanker recently exploded and burned during a summer off loading operation in Bay City, Michigan. Potential damage from such an accident would be multiplied several times were such a disaster to occur during the winter in the St. Marys River or elsewhere in the Great Lakes-St. Lawrence River Basin.

Great Lakes United has repeatedly opposed a fixed date extension of navigation season beyond freeze-up and before spring breakup on any of the shipping channels of the St. Lawrence Seaway. We continue to question the dubious economic benefits in light of the potential environmental costs. We question the routine opening of the Soo Locks in advance of April 1, based solely on the needs of commerce and shipping interests, without consideration of the environmental impacts of such openings.

Great Lakes United plans to review the justification for repeated requests by shipping interests for early opening of the Soo Locks and year round maintenance of shipping channels in the St. Marys River.

The twenty year debate over winter navigation must be brought swiftly and mercifully to a conclusion.

Sincerely,



Terry L. Yonker  
Executive Director

cc: Washington/Witzke, MUCC  
VanPutten/Schmidt, NWF  
Dempsey, CWA  
Kelley/Steinborn, MAG  
Harmes/Mehan, MDNR