May 30, 2017

Brigadier General Mark Toy  
Commander  
Great Lakes and Ohio River Division  
U.S. Army Corps of Engineers  
550 Main Street, Rm 10-524  
Cincinnati, OH 45202-3222

Dear General Toy:

As the U.S. Chairman of the International Lake Ontario - St. Lawrence River Board (Board), we are writing to share our concerns about high water flows in the St. Lawrence River. As you know, the Board advises the International Joint Commission (IJC) on water flows between Lake Ontario and the St. Lawrence River. These water flows are controlled by the IJC through the Moses Saunders Dam in Cornwall, Ontario and Massena, New York.

Due to heavy precipitation in the region, Lake Ontario water levels are at historic highs. In an effort to provide flood relief, the Board has authorized the current discharge of water through the dam structure at a level of 10,200 cubic meters per second - the highest volume under which commercial navigation can still operate safely.

In coming days, we understand that the Board may consider more aggressive action and release higher volumes for days or weeks at a time. Under such conditions, the U.S. and Canadian Seaway agencies would be obligated to suspend commercial navigation - effectively closing the St. Lawrence Seaway and disrupting maritime commerce to Great Lakes ports in Minnesota, Wisconsin, Illinois, Indiana, Michigan, Ohio, Pennsylvania and New York.

It is important to understand that ships delivering goods to our ports are part of a supply chain feeding manufactured products and raw materials into industries throughout the Midwest. A disruption to that supply chain would have a considerable and negative ripple
effect. Similarly, U.S. agricultural products bound for export markets would have to find alternative routes, if available, and could lose market share to foreign suppliers with whom they compete.

While we are sympathetic to the flood conditions in upstate New York, there is no quick way to drain Lake Ontario and provide relief. Even at high discharge volumes, it will take many weeks for mitigation to have any noticeable impact. From an economic perspective, flood damage has already taken its toll. It makes no sense to add to that economic impact by crippling navigation and commerce.

As the U.S. Chair of the Board, we urge you to be our voice in these deliberations and argue against water flows in excess of current levels.

Thank you for considering our views.

Sincerely,

Steven A. Fisher
Executive Director
American Great Lakes Ports Association