

Alliance for the Great Lakes * American Rivers * Church Women United in New York State * Citizens Campaign for the Environment * Clean Water Action and Clean Water Fund of Minnesota * Clean Wisconsin * Freshwater Future * Gathering Waters: Wisconsin's Alliance for Land Trusts * Illinois Council of Trout Unlimited * Indiana Wildlife Federation * Izaak Walton League of America – Bush Lake Chapter * Izaak Walton League of America – National Great Lakes Committee * Izaak Walton League of America – Headwaters Chapter * League of Women Voters Lake Michigan Region * Michigan Wildlife Conservancy * Midwest Environmental Advocates * Milwaukee Riverkeeper * Minnesota Center for Environmental Advocacy * Minnesota Division Izaak Walton League of America * Minnesota Environmental Partnership * Minnesota Lakes and Rivers Advocates * National Parks Conservation Association * National Wildlife Federation * Natural Resources Defense Council * Nature Abounds * Ohio Environmental Council * Onondaga Audubon * Prairie Rivers Network * Religious Coalition for the Great Lakes * Save the Dunes * Save the River - Riverkeeper of the Upper St. Lawrence River * Sierra Club, Illinois Chapter * Sisters of St. Joseph of Rochester Justice & Peace/Global Environment Committees * Superior Rivers Watershed Association * Tennessee Clean * Water Network * Tip of the Mitt Watershed Council * The Watershed Center Grand * Traverse Bay * Western Reserve Land Conservancy * Wisconsin Wildlife Federation

December 6, 2017

US Army Corps of Engineers, Chicago District
231 S. LaSalle St. Suite 1500
ATTN: Draft GLMRIS –BR Report
Chicago, IL 60604

Re: Comments regarding the Great Lakes and Mississippi River Interbasin Study – Brandon Road Draft Integrated Feasibility Study and Environmental Impact Statement – Will County, IL

Dear U.S. Army Corps of Engineers,

On behalf of the hundreds of thousands of Great Lakes and Mississippi River advocates that the undersigned organizations represent, we support the U.S. Army Corps of Engineers (Corps) Brandon Road Tentatively Selected Plan (TSP). We urge the Corps to finalize and advance the TSP as quickly as possible in order to reduce the risk of Asian carp entering and destroying the Great Lakes.

Aquatic nuisance species (ANS), like Asian carp, pose a dire threat to the ecological health and economies of Great Lakes and Mississippi River communities. Immediate action must be taken to prevent the further spread of ANS before they become established in our national freshwater treasures.

Asian carp are of particular concern, as they have already wreaked havoc on the Mississippi River and Illinois Rivers, outcompeting native fish for food and habitat. Great Lakes communities and industries would suffer irreparable harm if Asian carp establish in the Great Lakes and its many tributaries.

Asian carp in the Great Lakes would jeopardize:

- a \$7 billion/year fishing industry;
- a \$16 billion/year recreational boating industry;

- waterfowl production areas that support a hunting economy of \$2.6 billion/year; and
- hunting, fishing, and wildlife observation that generates approximately \$18 billion/year.

The situation is urgent and we cannot afford to delay any longer. Recent findings indicate that the Asian carp threat has only heightened, despite current management efforts. In 2015, the leading edge of the young Asian carp population moved 66 miles closer to Lake Michigan, a significant leap toward the lakes. In June 2017, a live Silver carp was found beyond the current electric barriers, just 10 miles from Lake Michigan.

Currently, the primary means of defense are three electric barriers in the Chicago Area Waterways System operated by the Corps. We cannot continue to rely solely on the electric barriers as a long-term solution, as multiple studies show that small fish and eggs can traverse the barriers, and barges can pull fish through the barriers.

The Corps' plan for Brandon Road represents a much-needed strengthening of our defenses against Asian carp. The plan should be pursued with the utmost urgency and efficiency.

Ultimately, however, more will need to be done to protect both the Great Lakes and Mississippi River basins. The TSP leaves an unacceptably high risk of Asian carp establishing in the Great Lakes. And it is not the most effective measure considered in the Brandon Road Study. Lock closure is shown to be the most effective at preventing Asian carp and other ANS from entering the lakes. The Great Lakes are a unique natural treasure and the economic base for millions of Americans. We cannot afford to gamble with them.

Additionally, control structures located at Brandon Road do not and can never protect against the many ANS poised to move from the Great Lakes into the Mississippi River. In the original Great Lakes and Mississippi River Interbasin Study authorization, Congress tasked the Corps with developing solutions to "prevent the spread of aquatic nuisance species between the Great Lakes and Mississippi River Basins." The Corps must ultimately meet the explicit intent of this language - preventing the transfer of ANS moving in both directions. Completion of the Brandon Road TSP should be the beginning, not the end, of this process.

We strongly encourage the Corps to prioritize and include in the Presidents FY19 budget appropriate resources to begin studying options to address this glaring need for action. Examining options to implement two-way protection should for the Great Lakes and Mississippi River basins should happen simultaneously and should not divert resources or focus away from finalizing the Brandon Road TSP. Additionally, we request that the federal government assume the full responsibility of the construction and operations and management costs of any ANS control points, including Brandon Road, in perpetuity.

The threat to the Great Lakes is urgent and time is of the essence. As such, we urge the Corps to finalize and construct the TSP as quickly as possible.

Sincerely,

Alliance for the Great Lakes
American Rivers
Church Women United in New York State
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Citizens Campaign for the Environment

Clean Water Action and Clean Water Fund of Minnesota
Clean Wisconsin
Freshwater Future
Gathering Waters: Wisconsin's Alliance for Land Trusts
Illinois Council of Trout Unlimited
Indiana Wildlife Federation
Izaak Walton League of America – Bush Lake Chapter
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Izaak Walton League of America – Headwaters Chapter
League of Women Voters Lake Michigan Region
Michigan Wildlife Conservancy
Midwest Environmental Advocates
Milwaukee Riverkeeper
Minnesota Center for Environmental Advocacy
Minnesota Division Izaak Walton League of America
Minnesota Environmental Partnership
Minnesota Lakes and Rivers Advocates
National Parks Conservation Association
National Wildlife Federation
Natural Resources Defense Council
Nature Abounds
Ohio Environmental Council
Onondaga Audubon
Prairie Rivers Network
Religious Coalition for the Great Lakes
Save the Dunes
Save the River - Riverkeeper of the Upper St. Lawrence River
Sierra Club, Illinois Chapter
Sisters of St. Joseph of Rochester Justice & Peace/Global Environment Committees
Superior Rivers Watershed Association
Tennessee Clean Water Network
Tip of the Mitt Watershed Council
The Watershed Center Grand Traverse Bay
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