



Colonel Aaron Reisinger, Commander
US Army Corps of Engineers, Chicago District
231 S. LaSalle St. Suite 1500
ATTN: GLMRIS – Brandon Road Comments
Chicago, IL 60604

Dear Colonel Reisinger,

The Great Lakes and St. Lawrence Cities Initiative thanks the U.S. Army Corps of Engineers for the opportunity to comment on the Brandon Road Draft Feasibility Study and Environmental Impact Assessment.

The risk of an invasion of Asian carp is a significant concern for the 131 cities of the Great Lakes and St. Lawrence Cities Initiative and their mayors, both in the United States and in Canada. All eyes are on the Chicago Area Waterways System to make sure actions are taken to protect the region's \$7 billion fishing industry, \$5.8 trillion economy, and rich biodiversity. There are few, if any, threats of equivalent magnitude to that of Asian carp for an ecosystem of the size and importance of the Great Lakes and St. Lawrence Basin.

As the Cities Initiative presents its comments and recommendations, we urge the Corps of Engineers and all agencies to implement the recommended measures promptly. Asian carp were found past the existing electric barrier and in the St. Lawrence River this past spring. Additional control measures for the highest risk pathway to the Great Lakes and St. Lawrence Basin are needed now.

Mayors and the Cities Initiative remain available as a key stakeholder in the region to help the Corps of Engineers implement solutions to keep not only Asian carp, but all aquatic nuisance species, from traveling from one basin to the other. We look forward to a continued relationship as control measures, outreach and other actions occur.

Most sincerely,

John Dickert, President and CEO
Great Lakes and St. Lawrence Cities Initiative



The Great Lakes and Mississippi River Interbasin Study—Brandon Road Draft Integrated Feasibility Study and Environmental Impact Statement—Will County, Illinois

Public Comments and Recommendations

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Comments and Recommendations

The Great Lakes and St. Lawrence Cities Initiative (Cities Initiative) is pleased to see the Brandon Road study released and recognizes that the delay was caused by circumstances outside of the Corps of Engineers' control. As a valued partner throughout the many years of work on Asian carp migration and other aquatic nuisance species (ANS), the Cities Initiative shares the Corps' concern for the Great Lakes and the St. Lawrence and for the flooding, navigation, and stormwater controls that are at the core of its mission in the Chicago area.

The Brandon Road study thoroughly explores the alternatives. The Cities Initiative particularly appreciates the cost estimates for each alternative, which help establish context and bring to reality the efforts needed to protect the Basin from Asian carp and other ANS. It also helps all stakeholders with varying knowledge of the issue understand that, although important, the investments needed are much less than the value of the economic activity lost if Asian carp establish a population in the Great Lakes and St. Lawrence Basin.

In order to further enhance the final version of the Brandon Road study, the Cities Initiative offers the following recommendations:

Recommendation 1: Confirm the Tentatively Selected Plan and Pursue Immediate Implementation

With the identification of the Brandon Road Lock and Dam area as the control point for ANS transfer from the Mississippi River Basin to the Great Lakes Basin and the thorough Feasibility Study and Environmental Assessment presented, the Cities Initiative recommends that implementation of the Tentatively Selected Plan (TSP) take place promptly. Asian carp have been found in the Great Lakes and St. Lawrence Basin recently. It is time to act now to ensure maximum risk reduction for the basin. The study states clearly that prevention is "the most efficient and effective method of combating the environmental, economic, and sociopolitical impacts of invasive species." There is still time to prevent the invasion, but not much. The Cities Initiative urges the Corps of Engineers to pursue all Congressional and technical actions to construct TSP at the Brandon Road Lock and Dam.

Recommendation 2: State clearly that the TSP is an Interim Measure

The Cities Initiative welcomes the TSP as a significant advancement in ANS control measures. However, it remains that full physical separation of the Mississippi River Basin and the Great Lakes Basin is the most effective way to reduce the risk of ANS transfers in both directions. A more concerted effort in the future is needed to address how the transportation needs could be satisfied if full physical separation were implemented. The Corps of Engineers should make it clear that the TSP for the Brandon Road Lock and Dam is an interim measure towards permanent protection for both basins from ANS transfers.



Recommendation 3: Clarify the TSP Protection against Transfer of ANS

The Brandon Road study states that the TSP was chosen because it “reduces the risk of Mississippi River Basin ANS establishment in the Great Lakes to the maximum extent possible [...]” (p. ES-15). However, full lock closure is the most effective way to stop ANS transfers. To ensure complete clarity, the study should state that among the alternatives that provide for continued navigation, the TSP reduces the risk of Mississippi Basin ANS establishment to the maximum extent possible.

Recommendation 4: Recognize the National Importance of the Treat of Asian Carp, Setting the Way for Full Federal Funding of the TSP

The Cities Initiative recognizes that the Corps of Engineers is prohibited to advocate for specific funding from the US Congress. However, by stating in the most clear manner that the threat of Asian carp is a national issue, it paves the way for stakeholders to advocate Congress to waive the local sponsor requirement for the TSP and authorize and allocate full federal funding for the TSP. Full federal funding was utilized for the existing electric barrier and would solve the issue of finding a local sponsor operating a facility otherwise wholly controlled by the Corps of Engineers.

Conclusion

The Great Lakes and St. Lawrence Cities Initiative thanks the U.S. Army Corps of Engineers for the opportunity to comment on the Brandon Road Draft Feasibility Study and Environmental Impact Assessment. Collaborative work with all stakeholders of the region is the most efficient way to ensure equitable protection of our priceless resource. The mayors of the Great Lakes and St. Lawrence Cities Initiative look forward to a continued relationship to protect our region from all invasive species. The time has come to finish work started many years ago and to protect future generations from the potentially disastrous impacts of Asian Carp. The time to act is now.

About the Cities Initiative

The Great Lakes and St. Lawrence Cities Initiative is a binational coalition of 131 cities in the United States, Ontario and Quebec representing over 17 million citizens. The mayors work with governments, First Nations and Tribes, and non-governmental organizations throughout the basin to protect, restore and enhance the world’s largest source of freshwater.