



February 21, 2019

Mr. Andrew Leichthy PMP
Project Manager
U.S. Army Engineer District Rock Island
Clock Tower Building PO Box 2004
Rock Island, Illinois 61204-2004

Dear Mr. Leichthy:

Thank you for the opportunity to provide comments on the *Great Lakes Mississippi River Interbasin Study – Brandon Road Integrated Feasibility Study and Environmental Impact Statement* (Final GLMRIS-BR report). The Great Lakes and St. Lawrence Cities Initiative (Cities Initiative), a coalition of United States and Canadian Great Lakes and St. Lawrence River mayors, feels strongly about the need to take urgent action to ensure Asian carp and other aquatic invasive species (AIS) do not make their way into the Great Lakes and St. Lawrence River system. Our comments reflect this sense of urgency and the need to ensure interim measures at Brandon Road Lock and Dam (BRLD) are effective at halting the upstream movement of Asian carp.

Our comments on the Final GLMRIS-BR report and the project overall focus on five themes: 1. Support for efforts at BRLD as an **interim measure** to stop Asian carp; 2. Concern with timing of the Recommended Plan; 3. Concern with cost for the Recommended Plan; 4. Concern with the status of land acquisition in the Recommended Plan; and 5. Support for performance monitoring and adaptive management with the Recommended plan. We submit these comments under the assumption that the US Army Corps of Engineers (USACE) understands the significant threat an established population of Asian carp could pose to the Great Lakes and St. Lawrence River system and the high level of concern that mayors and other stakeholders have around such a threat.

BRLD as an interim measure:

The Cities Initiative has been steadfast on the position that measures at BRLD are an interim step in a broader effort to fully secure and protect the Great Lakes and St. Lawrence River system from Asian carp and other AIS. The organization supports interim measures at BRLD in order to provide additional protection for the system more immediately, as the region and other stakeholders work to develop a more permanent and effective solution. We maintain that full physical separation of the Mississippi River and Great Lakes basins is necessary but recognize that we are still in early stages of deliberating and exploring that solution. The next best thing at this point would be interim measures at BRLD to provide additional security from the threat of Asian carp.



Concern with timing of Recommended Plan:

The region has been aware of the threat of Asian carp for decades. Various species of Asian carp are nearing Lake Michigan and policy and action on this threat need to happen more urgently than they are currently. The mayors of the Cities Initiative urge that the Recommended Plan move forward expeditiously and all effort be made by the USACE, the State of Illinois, the US Congress and all others involved to act in an urgent manner on authorization, appropriation and implementation of the Recommended Plan. To the extent that 'out of the box' thinking and action need to occur to help move things forward to implement interim measures at BRLD, we support such consideration.

Concern with the cost of the Recommended Plan:

The Incremental approach to the Recommended Plan is more than three times the original cost of the Tentatively Selected Plan. We understand that much of this increase is contingency related. We encourage that the work for the Recommended Plan move ahead and USACE and project partners do their best to keep costs down. As well, we fully support and encourage any co-sponsorship agreement that can be reached between the states of Illinois, Michigan and Wisconsin. This work has a high price-tag but this cost is still less than the price of efforts to eradicate or manage an established Asian carp population in the Great Lakes and St. Lawrence River system.

Concern with land acquisition in Recommended Plan:

While we understand the breadth of work needed to complete the Recommended Plan at BRLD, we remain concerned about a critical missing foundational element of the plan: the testing, study, and acquisition of the parcel of land for the upland support facility. The condition of this land remains an uncertainty and one which could have significant consequences on the timeline and flow of work, especially as the USACE aims to coordinate the work with previously scheduled maintenance on the Illinois Waterway. The Cities Initiative urges immediate action by the State of Illinois to gain access to the land and conduct any necessary environmental studies so we understand the state of that parcel and how it might impact the timeline for work.

Performance Monitoring and Adaptive Management:

We are encouraged by the USACE's emphasis on adaptive management and performance monitoring with respect to the Recommended Plan and structural elements. As technologies and approaches to deterring AIS like Asian carp continue to develop and evolve, we recognize that elements of the Recommended Plan may need to be adjusted or revised. We maintain that any technology ultimately chosen for the engineered channel be the best available technology to deter Asian carp at various life stages, and be as effective as possible in reducing the risk of interbasin transfer of AIS between the Mississippi River and Great Lakes basins. The organization would go so far as to maintain that any alternative's risk reduction be compared to the risk reduction associated with full physical separation of the two basins, which is the most protective approach.



Conclusion:

The Mayors of the Cities Initiative reiterate their support for interim measures at BRLD and urge the expeditious implementation of the Recommended Plan. The region and the United States and Canada cannot afford to delay action to halt the upstream movement of Asian carp into the Great Lakes and St. Lawrence River system. While it carries a hefty price tag, which we anticipate will be reduced as studies and designs are finalized, we believe it is a worthwhile investment in protecting the economic and ecological value of the Great Lakes and St. Lawrence River system. We encourage partnership, collaboration and ingenuity in order to finally move ahead on interim measures to halt Asian carp at BRLD. If you have any additional questions, please don't hesitate to contact the organization's President and CEO, John Dickert at 312-201-4516 / john.dickert@glslcities.org.

Sincerely,

Deputy Mayor Michelle Morin-Doyle
Chair

Great Lakes and St. Lawrence Cities Initiative

Mayor Mike Vandersteen
Vice-Chair

Great Lakes and St. Lawrence Cities Initiative