

December 8, 2017

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

Re: Comments regarding the Draft GLMRIS – Brandon Road Report

Dear Colonel Reisinger,

Please accept these comments submitted on behalf of the undersigned organizations as well as our hundreds of thousands of hunters, anglers, and outdoor recreation enthusiast members across the Great Lakes and Mississippi River basins and nationwide, regarding the U.S. Army Corps of Engineers' (Corps) Draft Great Lakes and Mississippi River Interbasin Study (GLMRIS) Brandon Road report.

The undersigned organizations appreciate the opportunity to comment. While we support the Corps Tentatively Selected Plan (TSP) we have several recommendations, which are highlighted below. We would like to first express that the overarching goal that Congress authorized the Corps to study is to reduce the risk of transfer of aquatic nuisance species (ANS) between the Great Lakes and Mississippi River Basins.

Threat

Indeed, the urgent need for action is only amplified by the live capture of a silver carp this June 2017 just 9 miles from Lake Michigan on the Lake-side of the electrical deterrents. Today, we are dealing with the worst crisis to face the Great Lakes since the colonization of the lakes by zebra and quagga mussels: the potential invasion of Asian carp. Once the invasive carp invade the lakes, there is no turning back; the damage will be done. We have no choice; we have to take action now to stop the Great Lakes' invasion by Asian carp. And we have to take action quickly, while there is still time to save the lakes, and the fish and wildlife that call them home.

The Great Lakes are a phenomenal natural resource, a network of five inland seas that span 94,000-square miles of surface area, contain 20 percent of all surface freshwater on the planet and comprise the world's largest freshwater ecosystem. The five lakes — Superior, Michigan, Huron, Erie and Ontario — provide drinking water for 35 million people. In addition, the Great Lakes support a \$7 billion fishery; a \$16 billion tourism 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. Combined, these represent a massive outdoor economy that is an integral part of North America's cultural and outdoor heritage.

Support of the Draft TSP

Our organizations are supportive of the TSP, as this plan is the best near-term option for getting additional defenses in place to prevent Asian carp from establishing a population in Lake Michigan and our Great Lakes until a long-term solution is found. While not perfect, we recognize that adding a combination of non-structural with structural controls in and leading up to the Brandon Road Lock and Dam is our best hope at reducing the threat that Asian carp will continue to swim towards Lake Michigan. These include an engineered channel fitted with an electric barrier, water jets, complex noise, and a flushing lock. We agree that this combination of technologies together, provide the greatest interim protection against Asian carp while still keeping navigation open.

While we support the TSP, our organizations encourage the Corps to consider the following recommendations moving forward:

Full Federal cost share

The Chicago Area Waterway System (CAWS) is currently operating like a superhighway in transferring invasive species between the Great Lakes and Mississippi River Basins. Zebra mussels have utilized the CAWS to spread throughout much of the nation, and have been found in western states including California. Therefore, the time to act is now as lessons learned from the national spread of other invasive species go unheeded. Unfortunately, the state of Illinois where the Brandon Road Lock and Dam resides, has declined to serve as the local cost share partner, complicating the final completion of the TSP. Combined with the national significance that the CAWS plays in transferring invasive species between the Great Lakes and the Mississippi River and the clear and present danger Asian carp present to our Great Lakes, we request that the federal government assume the full responsibility of the construction and operations and management costs moving forward in perpetuity.

Two-way Solution

While the TSP is aimed at reducing the risk of invasive species moving from the Mississippi River to the Great Lakes, the U.S. Congress authorized the Corps to *'prevent aquatic nuisance species movement between the Great Lakes and the Mississippi River Basins through aquatic connections.'* This means finding a two-way solution - in addition to keeping carp out of the Great Lakes - that also protects against the dozens of invasive species threatening the Mississippi River basin. In fact, the Corps' 2010 Project Management Plan for GLMRIS specifically references potential movement of species in both directions. Therefore, a permanent, effective, two-way, solution is still needed. We strongly encourage the Corps to prioritize and include in the Presidents FY 18 budget appropriate resources to begin studying options to address this glaring need for action. The scoping of a two-way control point in the CAWS should happen simultaneously, but not divert resources or focus away from finalizing the Brandon Road TSP.

ANS Research and Technology Development

We request that the Corps continue to support and utilize the most updated research on technology control options to deter and reduce the risk of invasive species transferring between the Great Lakes and Mississippi River basins. Given the urgency and high risk of Asian carp and other ANS getting into Lake Michigan, research and development on non-structural and structural control technologies must continue. Additional federal investments moving forward will help inform the Corps as it progresses with the current TSP and in identifying a two-way solution either at Brandon Road Lock and Dam or at other locations throughout the CAWS.

Non-structural actions must continue

We applaud the current actions from the Illinois Department of Natural Resources (ILDNR), U.S. Fish and Wildlife Service (USFWS), U.S. Geological Service (USGS), and other state and federal agencies in utilizing and deploying aggressive harvest activities along the Des Plaines River and other areas in the CAWS in order to ‘fish down’ the population of Asian carp below the Brandon Road Lock and Dam. We strongly encourage the Corps to continue to partner and collaborate with these agencies in order to reduce the leading edge populations of Asian carp adjacent to the Brandon Road Lock and Dam.

Conclusion

In conclusion, our organizations thank the Corps for the opportunity to submit comments. Preventing Asian carp and other invasive species from transferring between the Great Lakes and Mississippi River is an urgent matter that demands immediate action. We thank the Corps for its efforts in studying ways to address this critical situation. We encourage you to consider our comments and move as fast and efficiently as possible to finalize this study. We need stronger controls in place now in order to prevent Asian carp and other invasive species from continuing to swim closer to - and eventually into - the Great Lakes. Without firm and swift action to stop the further movement of Asian carp and other invasive species, the future of hunting, fishing and our outdoor heritage in the Great Lakes and Mississippi River region is at risk.

Sincerely,

American Sportfishing Association
Anglers of the Au Sable
Antigo Chapter Trout Unlimited (WI)
Austin Chapter 10 of the Izaak Walton League of America
Backcountry Hunters and Anglers
Bass Anglers Sportsman Society (B.A.S.S.)
The Bass Federation of Michigan
Bush Lake Chapter Izaak Walton League of America
Cass County Chapter of the Minnesota Izaak Walton League of America

Columbiana County Federation of Conservation Clubs (OH)
Congressional Sportsmen's Foundation
Conservation Federation of Missouri
Ducks Unlimited
Fly Fishers International
Fishing League Worldwide
Great Lakes Council of Fly Fishers International
Hoosier Coho Club
Indiana Wildlife Federation
Iowa Wildlife Federation
Izaak Walton League of America
Lake Erie Charter Boat Association
Marine Retailers of the Americas
Michigan B.A.S.S. Nation
Michigan Chapter, Backcountry Hunters and Anglers
Michigan Steelhead and Salmon Fishermen's Association
Michigan Trout Unlimited
Michigan United Conservation Clubs
Minnesota Chapter, Backcountry Hunters and Anglers
Minnesota Conservation Federation
Minnesota Division Izaak Walton League of America
Minnesota Trout Unlimited
Montmorency County Conservation Club (MI)
National Professional Anglers Association
National Wildlife Federation
New York Trout Unlimited
Northwest Indiana Steelheaders
Northwest Sportfishing Industry Association
Ohio B.A.S.S. Nation
Ohio Conservation Federation
Ohio Council of Trout Unlimited
Owatana Chapter of Izaak Walton League of American (MN)
Pennsylvania Council of Trout Unlimited
Silvertip Productions (Ohio)
Trout Unlimited
W.J. McCabe (Duluth) Chapter of the Izaak Walton League of America
Wabasha Chapter, MN Division, Izaak Walton League of America
Wild Rivers Chapter, Trout Unlimited (WI)
Wisconsin Chapter, Backcountry Hunters and Anglers
Wisconsin Trout Unlimited
Wisconsin Wildlife Federation