

January 8, 2019

Andrew Leichty PMP  
Project Manager  
U.S. Army Corps of Engineers, Rock Island District  
ATTN: GLMRIS-Brandon Road EIS  
Clock Tower Building, P.O. Box 2004  
Rock Island, IL 61204-2004

Dear Mr. Leichty,

Thank you for the opportunity to submit these comments on behalf of the undersigned organizations regarding the U.S. Army Corps of Engineers' (ACOE) Final GLMRIS Brandon Road Report and Environmental Impact Statement (Report).

The undersigned organizations appreciate the opportunity to comment. While we support the Report, we have some additional comments, which are highlighted below.

### **Importance of the Great Lakes Ecosystem**

The Great Lakes are an invaluable natural resources that spans 94,000 square miles and contains over 5,000 tributaries. The Great Lakes contain one-fifth of the world's fresh surface water and are world renown for boating and fishing. The states of the eight Great Lakes have 4.3 million registered recreational boats. The recreational boating industry contributes \$19 billion to the nation's economy and accounts for more than 246,000 jobs in the area. Recreational fishing has been on the rise in the Great Lakes since 2006. Over 1.8 million anglers fish the Great Lakes and its tributaries, contributing \$13.3 billion to the economy.

Safeguarding these natural resources and recreational industries are vital to the Great Lake states and the nation's economy. The introduction of Asian carp to the Great Lakes could cause not only the collapse of this immense ecosystem but could also cause unforeseen national economic upheaval.

### **Support of the Report**

The undersigned organizations are supportive of the Report. The Report is the best near-term project plan to protect the natural resources of the Great Lakes ecosystem against Asian carp establishment.

### **Cost**

The estimated cost of the projects within the Report increase from approximately \$275 million to \$777.8 million. This increase includes \$317 million in contingency costs and approximately \$460 million in project costs. We agree that while this is a significant increase in cost, however the Great Lakes are worth the investment for their protection against the potential economic disaster due to an Asian carp invasion.

However, we are wary of the Department of the Interior (DOI) having to self-appropriate almost \$12 million for their portion of non-structural actions. The DOI will need support to have this new line of

funding appropriated specifically for non-structural actions within the Report. The DOI budget has been stressed and has reduced funding for its aquatic invasive species programs since 2014.

### **Implementation Timeline**

We encourage and recommend that the ACOE proceed with the expedited strategy to implement this project. The risk to the Great Lakes is too high to wait any longer.

### **ANS Technology and Non-Structural Actions**

The Report has taken into account emerging and future technologies throughout implementation. We were encouraged to see that the ACOE reviewed all plans and replaced the water jet measure with an air bubble curtain after realizing that the air bubble curtain was more effective. We are also supportive of removing the mooring cells as they are not shown to reduce the risk of aquatic invasive species establishment.

As the projects within the Report are implemented in the future, we request that the ACOE continues to review and use the best science and technology available.

We applaud the ACOE for including non-structural actions within the Report. While we are wary of their funding source, they are critical in changing the public's behavior and continuing to keep Asian carp populations are or below current levels and below the Brandon Road Lock and Dam. These continued actions will be beneficial to the decrease leading edge of Asian carp populations.

### **Conclusion**

We would like to thank the ACOE for accepting these comments on behalf of the organizations listed below supporting the Report. Stopping the spread of Asian carp and other invasive species from reaching the Great Lakes remains a critical and urgent matter. We hope that you continue to hit the timeline outlined in the Report and that this is included in the February 2019 Chief's Report. Without these projects being implemented swiftly, the future of the boating and fishing pastimes in the Great Lakes are in danger of being lost.

Sincerely,

Association of Marina Industries

Marine Retailers Association of the Americas

American Sportfishing Association

Michigan Boating Industries Association

Bass Anglers Sportsman Society (B.A.S.S.)

National Marine Manufacturers Association

BoatU.S.

National Professional Anglers Association

Congressional Sportsmens Foundation

Trout Unlimited

Great Lakes Fishery Commission

Wildlife Forever

Lake Erie Marine Trades Association