



Great Lakes-St. Lawrence
Legislative Caucus

February 22, 2019

Andrew Leichthy PMP
Project Manager
U.S. Army Corps of Engineers, Rock Island District
Clock Tower Building, P.O. Box 2004
Rock Island, IL 61204-2004

Dear Mr. Leichthy:

As the leaders of the Great Lakes-St. Lawrence Legislative Caucus (GLLC), we are writing to submit comments on the U.S. Army Corps of Engineers' (USACE) report entitled "The Great Lakes and Mississippi River Interbasin Study (GLMRIS)—Brandon Road Integrated Feasibility Study and Environmental Impact Statement (EIS)—Will County, Illinois" (Final GLMRIS-Brandon Road Report & EIS), published for comment in the *Federal Register* on November 26, 2018. The GLLC is a nonpartisan, binational organization of state and provincial legislators in the eight U.S. states and two Canadian provinces that share the Great Lakes and St. Lawrence River. This letter marks the fourth time we have corresponded with the USACE regarding GLMRIS.

One of our highest priorities as an organization is to protect the Great Lakes from the threat of aquatic nuisance species (ANS), particularly Asian carp. The environmental and economic impacts of ANS are well documented; the Great Lakes states and provinces have borne the economic and ecological damages caused by ANS such as zebra and quagga mussels. Because of our past experiences with ANS invasions, we feel a great sense of urgency to prevent the introduction of Asian carp into our lakes.

The USACE's Recommended Plan for using the Brandon Road Lock and Dam to stop Asian carp involves a combination of nonstructural activities, acoustic fish deterrent, air bubble curtain, engineered channel, electric barrier, flushing lock, and boat launches. This defense-in-depth approach appears to have the potential to prevent Asian carp from reaching Lake Michigan through the Chicago Area Waterway System. We are very pleased that the State of Illinois has expressed interest in being the non-federal sponsor for the project – a necessary step before the project can move forward.



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The increase in estimated cost, however, is alarming, having nearly tripled from \$275,400,000 in 2017 to \$777,836,000 just 15 months later. The estimated cost of the new incremental strategy is even higher at \$832,271,000. We urge the USACE to work with the State of Illinois and the other Great Lakes states and provinces to identify ways to reduce the total cost while still maintaining the effectiveness of the approach. As legislators, we represent our citizens, businesses, and industries, and we have the authority to appropriate funding. We therefore urge the USACE to involve legislators in discussions about the project cost and apportionment as the work advances.

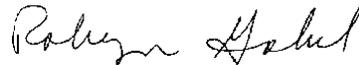
The extension of the implementation timeframe also is concerning. In 2017, the Tentatively Selected Plan estimated 2025 as the start of implementation, whereas the Recommended Plan offers 2027 as the new target under the expedited strategy. We urge the USACE to expedite the remaining milestones for GLMRIS-BR so that preconstruction engineering and design can begin at the earliest possible date, with construction to follow as soon as possible thereafter.

We thank you for your work on the Final GLMRIS-Brandon Road Report & EIS and for the opportunity to provide comments. If you have any questions about our comments, please contact Ms. Lisa Janairo, GLLC Director, at ljanairo@csg.org or 920.458.5910.

Sincerely,



Senator Ed Charbonneau, Indiana
Chair, Great Lakes-St. Lawrence Legislative
Caucus



Representative Robyn Gabel, Illinois
Vice Chair, Great Lakes-St. Lawrence
Legislative Caucus



Senator Laura Fine, Illinois



Senator Rick Niemeyer, Indiana



Senator Curt VanderWall, Michigan



Representative Jennifer Schultz, Minnesota



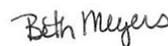
Assemblyman Peter Lawrence, New York



Representative Michael Sheehy, Ohio



Representative Curtis Sonney, Pennsylvania



Representative Beth Meyers, Wisconsin



Senator Ann Rest, Minnesota
GLLC Past Chair