



STATE OF MICHIGAN  
DEPARTMENT OF NATURAL RESOURCES  
LANSING



GRETCHEN WHITMER  
GOVERNOR

DANIEL EICHINGER  
DIRECTOR

February 22, 2018

U.S. Army Corps of Engineers  
Rock Island District  
ATTN: GLMRIS – Brandon Road EIS  
Clock Tower Building  
P.O. Box 2004  
Rock Island, Illinois 61204-2004

Dear Sir and/or Madam:

SUBJECT: Federal Register 2018-27739; COE-2018-0001-0020

Thank you for the opportunity to review the *Final Great Lakes and Mississippi River Interbasin Study - Brandon Road Integrated Feasibility Study and Environmental Impact Statement - Will County, Illinois (GLMRIS-BR)*. This letter is in response to the U.S. Army Corps of Engineers' (USACE) request for comments. We appreciate the USACE investing the time, effort and resources into seeking a solution to prevent invasive carp from entering the Great Lakes through the canal pathway.

The state of Michigan and the surrounding region have much at stake in preventing bighead, silver, and black carp (invasive carp) from entering the Great Lakes. Michigan has over 3,000 miles of Great Lakes coastline, over 11,000 inland lakes and 36,000 miles of rivers and streams. Collectively, these natural resources provide world-class opportunities for boaters, kayakers, canoeists, naturalists, birders, photographers, residents and visitors. In addition, these resources represent abundant potential habitat for invasive carp. At risk is a \$7 billion fishing industry, a \$16 billion boating industry, and a \$20 billion tourism industry in Michigan alone (Tourism Economics 2014). If invasive carp were to enter the Great Lakes basin, the consequences would be irreversible and costly. The GLRMIS BR-Final Report provides an excellent overview of the ecological, economic, social, and cultural resources at stake.

Action is urgently needed at Brandon Road to keep invasive carp from entering the Great Lakes. A number of facts and empirical evidence underscore the urgency of this need: the finding of bighead and silver carp above the electric barrier system; the finding of juvenile carp progressively further upstream (as noted in GLMRIS-BR); the finding of bighead and silver carp regularly near Brandon Road Lock and Dam (BRLD) in the Rock Run Rookery and fish approaching BRLD as evidenced through telemetry (USFWS Fish and Wildlife Coordination Act Report); and the noted vulnerabilities that have led to fish movement through the electric barrier system.

Furthermore, the biological, economic, and social effects from the rapid movement and colonization of invasive carp throughout the Mississippi, Ohio, and Missouri rivers underscore the potential for a similar invasion if bighead and silver carp were to enter the Great Lakes Basin.

The Michigan Department of Natural Resources (MDNR) has reviewed the GLMRIS-BR final report. We recognize that the report is definitive in its findings that closure of the lock would provide the least expensive, most effective, and most sustainable solution for preventing bighead, silver carp and *a. lacustre* from entering and colonizing in the Great Lakes Basin. However, we support moving forward expeditiously with the Recommended Plan at BRLD.

The recommended plan provides critical redundancy in technologies and presents a critical step toward better protecting the Great Lakes from invasive species, particularly invasive carp, at the highest risk location identified for their entry (Cudmore et al. 2012). However, there are many uncertainties surrounding the operation of the electric barrier, the efficacy of the acoustic barrier, and the switch to the bubble barrier. Research and development for these technologies should proceed quickly during the Project Engineering and Design Phase (PED), in addition to considering other approaches such as a cavitation barrier or the potential for a door or porous gate that could allow water to pass but exclude fish from entering the structured channel.

The dramatic cost increase between the draft TSP and Recommended Plan are very concerning in terms of the viability of bringing the project to completion. As a matter of forward progress, Michigan would request that a solution-oriented workgroup be formed with the nonfederal sponsor and representatives from the other Great Lakes jurisdictions that would bear the consequences, both ecological and economic, of failure of preventing bighead and silver carp from entering the Great. There are several aspects of the current design for which we have questions and would like to help seek solutions to reduce overall costs. For example, why does the structured channel need to be designed to the 500-year flood specification if the channel is designed to easily be cleared of fish? Why does the structured channel need to be so long? Could cost savings be achieved by a reconsideration of these design features? These suggestions in no way imply a need to restart the planning process but are intended to refine the design and seek strategic efficiencies so as to position the plan for the swiftest authorization and appropriation as possible.

We support the nonstructural control actions as noted in the Recommended Plan but recommend a governance structure similar to sea lamprey control that would engage stakeholders for both the Illinois River and the Great Lakes Basin in determining the pathways forward to reducing risk through pathways, reducing upstream movement of bighead and silver carp, and perhaps eliminating Asian carp from specific pools. This could further increase the sustainability of the project and potentially reduce costs. Additionally, non-structural controls should include addressing aspects of barge operation that could further reduce risk of movement of invasive species, such as an innovative "void filler" between barges that would reduce the risk of movement of small fish throughout the waterway, appropriate speeds approaching the electric barriers to reduce fish entrainment through them, or other types of actions that could further reduce the transfer risk by barge operation.

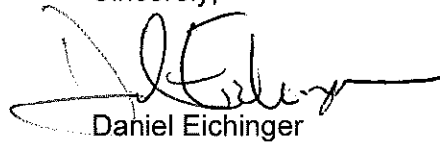
As a matter of cost savings and urgency, Michigan requests that the Recommended Plan be advanced as quickly as possible and would advocate for the expedited schedule for the cost savings and quicker implementation.

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As the GLMRIS-BR report notes, there is little opportunity to address other control points upstream of BRLD that would provide this level of protection to the Great Lakes. Furthermore, we view the work at BRLD as one step towards addressing the long-term goal of two-way protection for both the Great Lakes and the Mississippi River Basin.

If you need further information or assistance, please contact Dr. Tammy Newcomb at 517-284-5832 or [newcombt@michigan.gov](mailto:newcombt@michigan.gov). We look forward to our continuing partnership to protect the Great Lakes from invasive carp.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Eichinger', with a long horizontal flourish extending to the right.

Daniel Eichinger  
Director  
517-284-6367

cc: Ms. Kara Cook, Office of the Governor  
Mr. Josh Neyhart, Office of the Governor  
Dr. Tammy Newcomb, DNR