

*Chicago Area Waterway  
System Advisory Committee*

Care of:  
NIRPC  
6100 Southport Road  
Portage, Indiana 46383  
(219) -763-6060

October 20, 2020

Mr. R.D. James

Assistant Secretary of the Army for Civil Works  
Office of the Assistant Secretary of the Army (Civil Works) 108 Army Pentagon  
Washington, DC 20310-0108

Re: Finalizing the Great Lakes and Mississippi River Interbasin Study

Dear Assistant Secretary James:

This letter is written on behalf of The Chicago Area Waterway System Aquatic Invasive Species Stakeholder Committee (Committee), whose members have met since 2014. The Committee includes representatives from 40 public and private stakeholders that benefit from and have responsibilities related to the Chicago Area Waterway System (CAWS), as well as regional stakeholder groups representing maritime, commercial, recreational, and environmental interests. The goal of the Committee is to contribute to efforts to develop and implement a viable and sustainable plan to prevent the two-way movement of AIS through the CAWS, while maintaining other beneficial functions of the system.

Specifically, we ask you to support the United States Army Corps of Engineers (USACE), Chicago District's request for funding under its FY 2021 work plan to develop options for a one-way down-bound control point(s) to help prevent the transfer of ANS from the Great Lakes into the Mississippi River Basin and other water bodies. This is a next important step to update and maintain the value invested into GLMRIS. This will continue the work of developing options for preventing two-way aquatic invasive species transfer through the CAWS, consistent with the original Great Lakes and Mississippi River Interbasin Study (GLMRIS) authorization. Under the GLMRIS authorization, Congress tasked the Corps with developing alternatives that would "prevent the spread of aquatic nuisance species between the Great Lakes and Mississippi River Basins." Since the original GLMRIS report in January 2014, the Corps has taken steps to address species bound for the Great Lakes, but has made little progress in addressing down-bound species headed for the Mississippi River Basin, a critical component of Congress' goal of preventing the transfer of aquatic nuisance species moving in both directions.

Aquatic nuisance species (ANS) continue to pose a serious threat to the ecological health of rivers and lakes, as well as the people and economies those waters support in both the Mississippi River Basin and the Great Lakes Basin. In 2011, the Corps released an ANS White Paper as a product of its ongoing GLMRIS study that identified 39 species as ANS of Concern for the CAWS. Ten were of concern for potential transfer to the Great Lakes Basin from the Mississippi River; the remaining 29 species were of concern for potential transfer from the Great Lakes to the Mississippi River Basin. The final list of 13 ANS target species contains 3 species posing a risk to the Great Lakes (scud, Silver Carp, Bighead Carp) and 10 species found in the Great Lakes posing a risk of significant damage to the Mississippi Basin. Work to prevent the transfer of ANS into the Mississippi River and Great Lakes Basins should continue under GLMRIS.

Implementing the Corps' Brandon Road Lock and Dam project is critical to improve protections against Asian carp entering the Great Lakes. The Corps finalized the Brandon Road Chief's Report in May 2019. The U.S. House Water Resources Development Act of 2020 and the U.S. Senate America's Water Infrastructure Act of 2020 both include language authorizing the Brandon Road

Chief's Report. Additionally, the House increased the Investigations line item in its FY21 Energy and Water Appropriations and included the follow report language referring to the Brandon Road project, "As the Corps prioritizes projects, it shall consider critical projects to prevent the spread of invasive species. The Corps is reminded that this project is eligible to compete for additional funding within the Investigations account." The Senate has not yet released its FY21 appropriations bills. The CAWS Stakeholder Committee encourages funds requested for this project in the Corps work plan be included into final appropriations.

While these advancements are positive, structural measures at Brandon Road Lock and Dam will not protect against the many ANS poised to move from the Great Lakes into the Mississippi River. Hence, the need to finalize the original direction Congress gave to the Corps under the authorization of GLMRIS.

We must stress that continued action on one-way down-bound prevention should happen simultaneously with, and not divert resources or focus away from, implementing the Brandon Road Lock and Dam project.

Please contact Kathy Luther at [kluther@nirpc.org](mailto:kluther@nirpc.org) or (219)254.2513 if you have any questions regarding the Chicago Area Waterways System Aquatic Invasive Species Stakeholder Group.

Thank you for your consideration of our request.

Sincerely,

Alliance for the Great Lakes

<https://greatlakes.org/campaigns/keeping-invasive-species-out/>

Chemical Industry Council of Illinois

<https://www.cicil.net/>

Friends of the Chicago River

<https://www.chicagoriver.org/>

Great Lakes and St. Lawrence Cities Initiative

<https://glslcities.org/about/>

Great Lakes Fishery Commission

<http://www.glfc.org/>

Jack Darin, Director, Sierra Club, Illinois Chapter

<https://www.sierraclub.org/illinois/our-work/water/aquatic-invasive-species>

Metropolitan Planning Council

<https://www.metroplanning.org/news/8709/Keep-Asian-carp-out-of-Lake-Michigan>

Mississippi Interstate Cooperative Resource Association

<http://www.micrarivers.org.php7-35.lan3-1.websitetestlink.com/>

National Wildlife Federation

[55https://www.nwf.org/Our-Work/Environmental-Threats/Invasive-Species/Asian-Carp](https://www.nwf.org/Our-Work/Environmental-Threats/Invasive-Species/Asian-Carp)

Northwest Indiana Forum

<https://www.nwiforum.org/>

Prairie Rivers Network

<https://prairierivers.org/?s=carp>

Save the Dunes

<https://savedunes.org/>

Shedd Aquarium

<https://www.sheddaquarium.org/>

Cc: Major General Robert F. Whittle, Jr., USACE, Great Lakes and Rivers Division Commander,  
Colonel Paul Culberson, USACE, Chicago District Commander and District Engineer