January 22, 2018

Mr. Ryan Fisher
Acting 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: Great Lakes and Mississippi River Interbasin Study

Dear Acting Assistant Secretary Fisher,

On behalf of our millions of members and supporters, the undersigned organizations ask you to support the Army Corps of Engineers, Chicago District's request for funding under its FY 2018 work plan to continue work on developing options for preventing two-way aquatic invasive species transfer through the Chicago Area Waterways System (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 as well, a critical component of Congress' goal of preventing the transfer of aquatic nuisance species moving in both directions.

Aquatic nuisance species (ANS) 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 River 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 Tentatively Selected Plan (TSP) is critical to improve protections against Asian carp entering the Great Lakes, and the GLMRIS – Brandon Road Study should be completed as quickly as possible so that these protections can be implemented with all haste. But 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. Also, the TSP leaves significant continuing risk of northbound Asian carp entering the Great Lakes. Nor will the TSP stop all classes of species moving from the Mississippi River toward the Great Lakes: the TSP achieves some level of risk reduction for swimming and floating species, but it will not stop hitchhiking or hull-fouling species. All of these issues should be further explored and addressed by making good on Congress' intent to prevent the movement of ANS in both directions.

We must stress that continued action on two-way prevention should happen simultaneously with, and not divert resources or focus away from, finalizing the GLMRIS-Brandon Road Study.

Please contact Molly M. Flanagan, Vice President of Policy at the Alliance for the Great Lakes at mflanagan@greatlakes.org or (312) 445-9741 if you have any questions.

Thank you for your consideration of our request.

Sincerely,

Alliance for the Great Lakes
Clean Wisconsin
Environmental Law and Policy Center
Freshwater Future
Healing our Waters – Great Lakes Coalition
Michigan Environmental Council
Michigan League of Conservation Voters Education Fund
Milwaukee Riverkeeper
National Wildlife Federation
Natural Resources Defense Council
Ohio Environmental Council
Prairie Rivers Network
Sierra Club, Illinois Chapter
Tip of the Mitt Watershed Council
Save the River – Upper St. Lawrence Riverkeeper

Cc: Colonel Aaron W. Reisinger, Chicago District Commander