



Ohio Environmental Council

Comments of the Ohio Environmental Council Regarding GLMRIS - Brandon Road Integrated Feasibility Study And Environmental Impact Statement

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Introduction

Aquatic nuisance species (ANS), like Asian carp, pose a dire threat to the ecological health and economies of Great Lakes and Mississippi River communities. Silver and bighead carp (Asian carp) are of particular concern for Lake Erie as they are voracious feeders, requiring large amounts of plankton, making Lake Erie ideal habitat. Lake Erie, the shallowest and warmest of all the Great Lakes, is the most biologically productive Great Lake. It produces more fish for human consumption than all of the other lakes combined.

Several scientists have noted that the timing of spawning for Asian carp is more related to turbidity increase in rivers than hydrology. This may be a defense mechanism because the eggs and larvae are defenseless to sight-feeding predators while in the drift. These carp also require a minimum of 100 km of undammed river length to reproduce. In Ohio, the Maumee, Black, Vermillion, Huron, and Portage rivers meet the required criteria for Asian carp reproduction. All of these conditions suggest that Asian carp would be able to grow, live, and reproduce in the Lake Erie watershed.

These fish are also dangerous. Asian carp can grow to more than 4 feet long and weigh up to 100 pounds, and they jump several feet out of the water when disturbed by a boat motor. In the Mississippi River, adults have sustained broken collar bones, noses, and teeth, as well as been knocked unconscious.

Asian carp also can dominate aquatic ecosystems by out-competing native fish for food and habitat, like perch, bass, and walleye. As they feed near the base of the food chain, they can cause an entire system to become depauperate. This is particularly concerning because Lake Erie is the walleye capital of the world and supports one of the biggest freshwater commercial fisheries in the world. In Ohio, about 35% of our perch quota is given to the commercial fishing industry. Each year more than \$300 million is spent in the Ohio Lake Erie basin - \$1 billion in the whole Lake Erie watershed - on fishing. If Asian carp invade the Great Lakes, they could also devastate this \$1 billion fishing industry and permanently alter how recreational boaters, anglers, wildlife watchers, and tourists use and enjoy Lake Erie and its many tributaries. As a result of tourism and travel from boaters, anglers, and wildlife watchers Ohio gains more

than \$14 billion in revenue annually and supports more than a quarter of a million jobs. The impact of the Asian carp would be irreversible to the people, wildlife, and economies that rely upon Lake Erie.

The U.S. Army Corps of Engineers (Corps) GLMRIS - Brandon Road plan outlined in the study can serve to strengthen prevention measures for Asian Carp from entering the Great Lakes. The Brandon Road project should be the beginning, not the end, of this process to prevent Asian Carp from entering the Great Lakes. We urge the Corps to finalize and advance the project as quickly as possible in order to reduce the risk of Asian carp entering and destroying the Great Lakes. Additionally, the Corp should plan for long-term hydrologic separation of the Great Lakes and Mississippi River basins. More detailed comments follow.

Cost

The proposed project cost increased from \$275 million in the draft plan to \$778 million in the proposed final plan. Most of the overall cost increase results from the Corps adding a 66 percent premium (\$317 million) to allow for any contingencies. Although this amount of contingency funding is well above a typical Corps project it is well worth preventing the economic devastation Asian Carp would cause to Great Lakes communities. We urge the Corps and other agencies to clearly explain the breakdown of cost estimates and the inclusion of a high level of contingency in private and public communications. Stakeholders and potential non-federal funding partners must be presented with realistic budget expectations. The Corps is currently budgeting projects with extremely cautious contingencies, so the actual construction cost could well be far less than the current budgeted amount.

The Corps should commit funding to PED in fiscal year 2019 and are disappointed that this did not occur. We ask that the Corps commit funding in fiscal years 2020, 2021 and 2022 to support the next phase of the project, Preconstruction Engineering and Design (PED). The Corps has the authority to move to the next phase of work and should fund it and act promptly on PED. The federal government should make sure that adequate funding for PED is included in the FY 2020 budget so that the Corps can get started in Fall of 2019 or sooner. We urge the Corps to leverage the broad support for these additional protections to make sure they receive the funding they need to move forward.

Electric Barrier

While electric barriers can provide a significant level of extra protection against the movement of Asian carp and other species, such barriers also have flaws that include: schools of small fish can traverse electric barriers; barges can entrain and pull fish distances of up to ten miles, including through the electric barriers; barges transiting the barriers create reverse flows, decreasing the voltage gradient of the barrier by up to 88% and allowing fish to cross the electric barrier concurrent with downstream-bound loaded tows. For these reasons, the Corps should both maximize the effectiveness of the barrier and continue investigating additional measures that can address the shortcomings in an electric barrier approach.

We applaud the Corp's intentions to adjust operating times of the electric barrier after initial testing and to shut the lock if the barrier malfunctions at any time. But because we believe that the effectiveness of the barriers will be severely inhibited by any powering down while vessels are traversing the locks, we urge the Corps to consider resolving the issue during the pre-construction engineering and design (PED) phase. The insulated walls and floor of the engineered channel would minimize stray current adequately

to address life safety concerns.

Two Way Transfer of Aquatic Nuisance Species (ANS)

Given the long time frame before completion of the project at Brandon Road, we respectfully request that the Corps not wait until then before focusing on two-way transfer, but instead move forward on two-way protections concurrently with implementing the Brandon Road project. The scoping of a two-way control point to address ANS moving between the basins should begin immediately, and must happen simultaneously with, and not divert resources or focus away from, the plans at BRLD. This includes ongoing monitoring and risk assessment in both the Great Lakes and Mississippi River basins.

Conclusion

In the Corps' previous report, the Tentatively Selected Plan (TSP), the timeline for implementation of measures at Brandon Road Lock and Dam anticipated a construction completion date of 2025. However, in public communications the Corps has repeatedly referred to 2028 as the earliest possible date of completion. This is moving in the wrong direction. We request a detailed explanation of the new timetable and reiterate the importance of expediting, not delaying, the completion of this project. The potential damage caused by transfer and establishment of Asian carp in the Great Lakes cannot be underestimated, especially in Lake Erie. The costs that will be incurred to mitigate the damage caused by Asian carp populating the Great Lakes far outweigh the costs associated with implementing additional protections at Brandon Road Lock and Dam.

We know from experience the devastating impacts of invasive species on the Great Lakes. Too rarely do we have the opportunity to prevent the damage of invasion before it begins, yet such an opportunity is now on our doorstep. There are no second chances. Future actions based on good science-based information are crucial to the health of the Great Lakes ecosystem and our economy.

Therefore, the Ohio Environmental Council urges the Corps to quickly put into place the necessary measures at Brandon Road Lock and Dam while seeking a plan for long-term hydrologic separation of the Great Lakes and Mississippi River basins.

Sincerely,

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