

Thank you for your comment, Tammy Newcomb.

The comment tracking number that has been assigned to your comment is GLMRISBRS50017.

Comment Date: January 30, 2015 12:12:14PM

GLMRIS Brandon Road Scoping

Comment ID: GLMRISBRS50017

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Attachment: Michigan's comments Brandon Road NEPA Scoping.pdf

Comment Submitted:



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF NATURAL RESOURCES
LANSING



KEITH CREAGH
DIRECTOR

January 30, 2015

U.S. Army Corps of Engineers
Brandon Road Scoping
231 South LaSalle Street, Suite 1500
Chicago, Illinois 60604

Dear Brandon Road NEPA Scoping Team:

Thank you for the opportunity to provide comment for scoping of the activities to be considered at the Brandon Road Lock and Dam for the purposes of preventing upstream movement of aquatic invasive species (AIS)--particularly bighead, silver, and black carp--through the Chicago Area Waterway System towards the Great Lakes.

In consideration of significant issues associated with this scoping process, we submit the following as rationale for the federal interest in modifying Brandon Road Lock and Dam and the benefit to the public for this investment:

1. Significant Natural Resources such as Ecosystems and Threatened and Endangered Species

The Great Lakes possess 20 percent of the world's freshwater and unique attributes of that freshwater is found only in a large lake ecosystem. Invasive species to date have caused irreparable disruption to the ecosystem for which millions of dollars have been, and will continue to be, invested to address prevention, detection, eradication, and control. Several federally endangered mussels, fish of greatest conservation need like lake trout, lake sturgeon, and Coregonids would be further at risk if bighead, silver, and black carp reach the Great Lakes, tributaries to those lakes, and inland lakes. Food web disruption has been well documented for the current invasive species and there is no evidence to suggest that an additional three species with the life history characteristics that these fish possess would yield different outcomes.

2. Commercial and Recreational Fisheries

The Great Lakes host a vibrant commercial (state licensed and tribal sockside value of \$14.2 million annually) fishery that is managed through region wide coordination and through court-ordered Consent Decrees. Knowingly jeopardizing these commercial fisheries is unacceptable.

Recreational fisheries support billions of dollars to the economy through tourism throughout the region. Michigan has witnessed devastation to local economies with shifts in fisheries as a result of invasive species. Bighead, silver, and black carp pose further threats to these fisheries as the Great Lakes agencies have managed for recovery and towards a more native community.

3. Current Recreational Uses of the Lakes and Waterways

Michigan is ranked second in boating registrations for the country. Boating and associated recreational activities are widely enjoyed throughout the Great Lakes, its tributaries, and inland lakes. Silver carp in particular pose a significant threat to boating and recreational activities as a result of their jumping behavior. Jumping fish have caused bodily harm to people boating through the waterways and a 50 pound flying projectile could be lethal to small children. The threat of physical harm while boating is real and deters recreational pursuits on the waters inhabited by these fish. Economic consequences would result from declines in tourism and local economies as a result of a silver carp infestation.

4. Effects on Water Users

Noted above for fishing and boating.

5. Effects of potential AIS controls on current lake and waterway uses such as flood risk management, commercial and recreational navigation, recreation, water supply, hydropower and conveyance of effluent from wastewater treatment plants and other industries.

Invasive species risk reduction alternatives are available to mitigate the potential negative consequences of a one-way barrier at Brandon Road lock and dam.

Without controls, risk is increased for the movement of these fish through the Chicago Area Waterway System into the Great Lakes. Studies have shown that while the risk is reduced, the current electric barriers do not reduce as much risk as originally intended. This leaves the unacceptable potential for fish to pass through the barriers, especially with any type of barrier failure in this area of the watershed, so close to the Great Lakes.

The Michigan Departments of Natural Resources, Environmental Quality, and Agriculture and Rural Development reiterate the call for action that we requested in our response letter to the Great Lakes Mississippi River Interbasin Separation Study last year for immediate modification of Brandon Road Lock and Dam to address upstream movement issues of bighead, silver, and black carp.

We request that the Army Corps of Engineers (ACOE) further reduce the risk of bighead, silver, and black carp from entering the Great Lakes with a new design of an electric barrier within the lock, real time monitoring with cameras or other devices at the lock to detect fish movement past the electric barrier, an active flushing capacity for the lock to move any invasive species out of the lock, and modification of the dam (if needed) to prevent any fish from passing through the barrier. This should be completed in as cost-effective and timely manner as possible as time is of the essence in prevention of Asian carp movement.

Michigan fully recognizes that strategic prevention and control of AIS is a shared responsibility among federal, state, regional and public stakeholders. As such, we have: a) fully participated

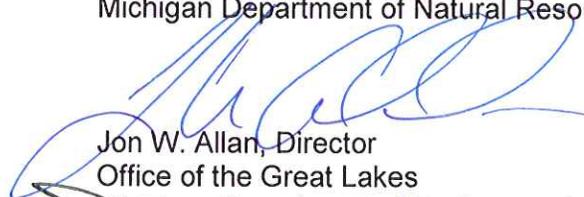
in the Asian carp forums that are directed towards actions outside of our jurisdiction, b) invested in multiple public education and outreach opportunities, c) helped design and implement the Great Lakes Region's Aquatic Invasive Species Mutual Aid Agreement, d) led two field response exercises in larger river and big lake systems, e) led two table-top response exercises, and f) participated in two others. We are supporting additional invasive species training for our staff and have had an online reporting mechanism and state plan for Asian carp for more than five years. This year, Michigan is investing \$5 million dollars towards invasive species prevention, detection and control efforts. We believe the sum of this work demonstrates our dedicated efforts towards the close coordination of a variety of local, state and federal agencies to implement actions commensurate with their resources and authorities toward achieving a comprehensive AIS solution.

We look forward to continuing to assist the ACOE in recognizing the importance of protecting the Great Lakes and implementing the best prevention strategies for the canal pathway. If you have any further questions regarding our input, please contact Dr. Tammy Newcomb, newcombt@michigan.gov or 517-284-5832.

Sincerely,



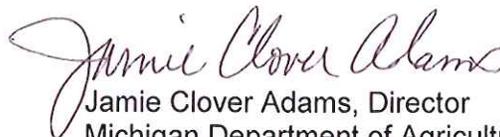
Keith Creagh, Director
Michigan Department of Natural Resources



Jon W. Allan, Director
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Michigan Department of Environmental Quality



Dan Wyant, Director
Michigan Department of Environmental Quality



Jamie Clover Adams, Director
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cc: Mr. John Walsh, Director of Strategy, Office of the Governor
Dr. Tammy Newcomb, DNR