



Illinois Department of Natural Resources

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Pat Quinn, Governor
Marc Miller, Director

March 31, 2011

Colonel Vincent V. Quarles
District Engineer
U.S. Army Corps of Engineers
Chicago District
111 N. Canal Street, Sixth Floor
Chicago, Illinois 60606

Dear Colonel Quarles:

On behalf of the Illinois Department of Natural Resources, I'd like to offer a few comments regarding the Great Lakes and Mississippi River Interbasin Study (GLMRIS) Project Management Plan.

First, I want to commend the Corps for its diligence in seeking public review and comment, beginning with the Chicago meeting on December 15, 2010 and continuing with all the meetings you've held throughout the Great Lakes and Mississippi River basins. I firmly believe that the quality of your study and the credibility of the Corps' work will be enhanced by this level of public review and participation. I encourage you to continue this active public participation program throughout the timeframe of this study.

The overall study purpose, as directed by Congress, is very broad and encompassing. Their direction is to prepare "a feasibility study of the range of options and technologies available to prevent the spread of aquatic nuisance species between the Great Lakes and Mississippi River Basins through the Chicago Sanitary and Ship Canal and other aquatic pathways". Based on this Congressional language, we concur with your recommended approach to separate the study into two Phases, with Interim I being the connections within the Chicagoland area (the CAWS), and Interim II the potential hydraulic connections outside the Chicagoland area but within the Great Lakes and Mississippi River/Ohio River basins.

This study has enormous significance to Illinois. The study area includes the entire state. Not only are we a Great Lakes state, we are a river state, with the Mississippi, Illinois, Ohio and Wabash Rivers shaping not only our boundaries but providing a waterway transportation system and natural resource opportunities second to none. No other state has as much at stake in this study as Illinois. While not an exhaustive list, some issues of great importance to Illinois are:

- Sport and commercial fishing on Illinois waters of Lake Michigan.
- Recreational boating, both on Lake Michigan and the CAWS.
- Waterborne navigation, commerce and tourism.
- Water quality of Lake Michigan and the CAWS.
- Public water supply for over 7 million Illinois residents.
- Stormwater management and flood control.
- Wastewater treatment plant effluent management.
- Origin and extent of existing ANS within the entire study area.

Based on our review of the Project Management Plan, we believe the Corps' study approach and identification of the major work tasks are sound. The complexity of the CAWS, and the potential impacts associated with a change in the operation of the CAWS require that the entire conduct of the study, from data collection to plan formulation and analysis, be thorough, rigorous, and utilize the best expertise possible. The IDNR stands ready to assist the Corps in this study effort, and I encourage your study team to contact the various Offices within IDNR that have expertise and experience with the CAWS.

I am well aware that the Corps is under great pressure to compress the study schedule down to an 18 month timeframe. While I also encourage the Corps to proceed with all due haste in performing this study, I recognize that the complexity of this study, the statutory requirements of the federal study process and the absolute need to conduct this study in a professional manner will require a significant investment of time and resources.

The Corps study timeframe has been limited to the completion of the Feasibility Study. I recommend that the Corps describe and develop a time schedule that outlines the remaining elements of the federal review and approval process that must be completed before a project can be authorized for construction.

Finally, I note that there are a number of activities and studies currently underway as part of the Asian Carp Regional Coordinating Committee's Control Strategy Framework that will provide valuable data and assistance to the GLMRIS study. The IDNR will continue to be actively engaged in the work of the RCC as we work towards preventing the spread of ANS across these two great water basins.

Thank you for the opportunity to comment.

Sincerely,



Marc Miller
Director