



AMERICAN  
GREAT LAKES PORTS  
ASSOCIATION

March 31, 2014

The Honorable Jo-Ellen Darcy  
Assistant Secretary of the Army for Civil Works  
U.S. Army Corps of Engineers  
108 Army Pentagon  
Washington, DC 20310-0108

Dear Secretary Darcy:

The American Great Lakes Ports Association (AGLPA) is an organization representing the interests of commercial ports and port users on the United States side of the Great Lakes. AGLPA works to advocate public policies with the goal of fostering maritime commerce and related employment in the Great Lakes region.

On January 6, 2014, the U.S. Army Corps of Engineers (USACE) released the Great Lakes and Mississippi River Interbasin Study (GLMRIS). We welcome this opportunity to comment on the study results.

First authorized in the Water Resources Development Act of 2007, GLMRIS seeks to identify ways to prevent the migration of non-native aquatic species between the Great Lakes and Mississippi River basins. In the context of this study, there has been a strong public focus on the threat posed to the Great Lakes by several variety of Asian Carp, which are currently present in the Mississippi River basin.

We share concern for the potential impacts a self-sustaining population of Asian Carp may present to the Great Lakes ecosystem and fishery. For that reason, we appreciate the Corps' ongoing efforts to coordinate with other federal and state agencies in a comprehensive management strategy for the Asian Carp.

Although GLMRIS evaluates eighteen possible pathways through which Asian Carp and other species could transfer between the Mississippi and Great Lakes, primary focus was

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given to the Chicago Area Waterway System (CAWS), the only permanent connection between the two basins.

The CAWS is of critical importance to southern Lake Michigan ports. These include the ports of Milwaukee, Chicago, Indiana Harbor, Gary, and Burns Harbor – all of which either ship or receive cargo via the CAWS. The waterway handles approximately 15 million tons of cargo annually, including coal and coke, petroleum products, aggregates, grains, chemicals, and steel products. The economic importance of these cargoes is significant. A 2010 study by Martin Associates for the Ports of Indiana concludes that commerce through the CAWS supports 17,000 Indiana jobs and \$1.9 billion in economic activity. A study commissioned by the Illinois Chamber of Commerce that same year concludes that closure of the waterway would result in a net economic loss to the Chicago area of \$4.7 billion over 20 years.

The GLMRIS report details eight scenarios to prevent the movement of aquatic invasive species through the CAWS. Two of these options propose continued or enhanced management practices such as monitoring, fishing, netting, and use of chemical controls. The Corps estimates that such management practices could begin to be deployed immediately and cost up to \$68 million. Six additional options propose structural controls requiring the construction of complex barriers, locks, flood control, filtration and water treatment infrastructure. The Corps estimates that these scenarios will take between 10-25 years to implement at a cost of \$7.8 - \$18.3 billion. Of the eight options, two would physically separate the waterways.

**We'd like to clearly state that we oppose physical separation of the CAWS.**

As a matter of public policy, we oppose the closure of navigation infrastructure as a method of controlling aquatic nuisance species (ANS). The implications of doing so will threaten maritime transportation throughout the United States. For example, in the past, some organizations have called for closure of the St. Lawrence Seaway to prevent the introduction of ANS. We have opposed those efforts. Similarly, some in Minnesota have sought the closure of the Upper St. Anthony Falls Lock in Minneapolis for the same reason. As various species migrate through U.S. waterways federal policy should not respond to this challenge by amputating portions of the navigation system.

Based on the GLMRIS study results, it is apparent that physical separation of the CAWS would result in a cessation of maritime commerce and a shift of freight to already congested regional highway and rail systems. Waterborne transportation is the safest and most efficient means of moving goods with the least impact on the environment. A single barge can transport the same cargo as 80 trucks. Shifting freight from barge to highway will have negative consequences on public safety and air quality.

The study describes proposals put forward by some groups to construct a physical barrier featuring a barge lift, or freight transfer station to maintain the flow of maritime commerce.

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GLMRIS discusses these concepts and notes that they are viewed as unfeasible. We wish to highlight that the GLMRIS study proposes no transportation mitigation plan, but rather, accepts modal shift as the consequence physical separation.

**While we oppose physical separation of the CAWS, we believe federal and state officials must enhance current efforts to manage Asian Carp populations near the CAWS and prevent their migration into Lake Michigan.**

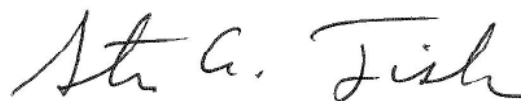
Fortunately, the study results point to a path forward. Given the pressing need to address Asian Carp migration, the long timeline required to implement structural solutions and the unrealistic cost of those solutions, the USACE should rededicate itself to existing structural solutions (electronic barriers) and continued partnering efforts focused upon enhanced management practices (monitoring, netting, chemical controls, etc.). These approaches can be implemented quickly and at a realistic cost.

The good news is that control efforts to date have been effective. Federal and state agencies have deployed a suite of Asian Carp control methods along the CAWS, including the construction of electronic barriers. According to the Congressional Research Service (CRS), the federal government is spending more than \$50 million each year on various aspects of its Asian Carp Control Strategy Framework, and has spent \$228 million since the strategy was launched in 2010. These efforts have been worthwhile. The carp population (which is actively monitored) has remained 50 miles south of the electronic barriers and has not moved.

We understand that the USACE is now awaiting Congressional direction regarding next steps in this process. We look forward to working with the Corps, Congress and other stakeholders to help support those near-term actions that will enhance protection of the Great Lakes, while maintaining maritime commerce.

Thank you for considering our views.

Sincerely,

A handwritten signature in black ink that reads "Steve A. Fisher". The signature is written in a cursive, flowing style.

Steven A. Fisher  
Executive Director