



March 3, 2020

U.S. House of Representatives
Washington, DC 20515

Dear Representative:

On behalf of the Healing Our Waters-Great Lakes Coalition, we urge you to support the following priorities in the Water Resources Development Act (WRDA) of 2020 that the House will consider later this year.

The Army Corps of Engineers plays a significant role in helping Illinois, Indiana, Michigan, Minnesota, New York, Ohio, Pennsylvania, and Wisconsin restore the Great Lakes. Through projects that have been authorized like the electric dispersal barrier in the Chicago Sanitary Ship Canal that helps prevent aquatic invasive species from entering the Great Lakes to other programs like the Great Lakes Fishery and Ecosystem Restoration Program, Army Corps investments are helping our region grow our economy and protect our environment.

However, even with the results we are seeing, there is still much work to be done to ensure the region's waterways are resilient to our changing climate. What's more, there remains a need for the Army Corps to address existing threats to the drinking water for over 30 million Americans in the Great Lakes region.

To help make more progress, we ask you to support the following priorities in any WRDA bill that the House considers this year:

Stop Invasive Asian Carp

The threat of invasive Asian carp continues to be very real and persistent in Great Lakes region. Invasive Asian carp were first detected in the Illinois River in the 1990s and have moved steadily closer to Lake Michigan.¹ Asian carp larvae have been detected less than 50 miles from the lake.² In June 2017, a live Silver Carp was found just nine miles from Lake Michigan.³ In November 2019, numerous eDNA samples from two types of invasive Asian carp were detected just 2½ miles from Lake Michigan in Chicago's Bubbly Creek.⁴ The establishment of Asian carp in the Great Lakes would devastate a \$7 billion fisheries industry and would undermine the outdoor recreation economy on which many of our communities depend.

¹Irons, Kevin S., Koel, Todd M., Ratcliff, Eric, "Asian Carp Invasion of the Upper Mississippi River System," *USGS Upper Midwest Environmental Sciences Center*, 2000.

https://www.umesc.usgs.gov/reports_publications/psrs/psr_2000_05.html

²"Update: Small Asian Carp Found in Marseilles Pool of Illinois River," *Asian Carp Regional Coordinating Committee*, October 30, 2015, <https://www.asiancarp.us/News/Map103015.html>

³"Silver Carp Found Nine Miles from Lake Michigan," *Asian Carp Regional Coordinating Committee*, June 29, 2017, <https://www.asiancarp.us/News/silvercarpcapture.html>

⁴Keith Matheny, "Asian Carp 'eDNA' found in Chicago creek near Lake Michigan. But what does it mean?" *Detroit Free Press*, November 25, 2019, <https://www.freep.com/story/news/local/michigan/2019/11/25/asian-carp-edna-found-chicago-bubbly-creek-near-lake-michigan/4230603002/>

The Army Corps is at the forefront of these efforts engaging federal and local partners on critical construction projects in defense of the spread of these invasive species. In May 2019, the Army Corps delivered its Chief's Report on the Brandon Road Lock and Dam project to Congress. The recommended plan includes technologies and both structural and non-structural measures to stop the movement of invasive Asian carp toward the Great Lakes. The lock at Brandon Road is a logical choke point to install Asian carp control measures to prevent the fish from moving closer to Lake Michigan.

Congress must take action to ensure the Brandon Road project stays on track. When considering the next Water Resources Development Act this year, we ask you to include the following provisions:

- Congressional authorization of the structural and nonstructural measures recommended by the U.S. Army Corps of Engineers in the Chief's Report for "The Great Lakes and Mississippi River Interbasin Study – Brandon Road – Will County, Illinois."
- A cost-share adjustment to full federal funding for project construction by the U.S. Army Corps of Engineers.
- Additional project authorization that allows the Corps to rapidly study and implement options and technologies at Brandon Road that improve the efficacy of the aquatic nuisance species (ANS) measures similar to the efficacy study authority associated with the electric barrier (Section 3061(b)(1)(D) of WRDA 2007) and implementation authority in Section 1039(c) of the WRRDA of 2014, P.L. 113-121, per sections ES.15 and 9.13.6 of "The Great Lakes and Mississippi River Interbasin Study -- Brandon Road Final Integrated Feasibility Study and Environmental Impact Statement – Will County, Illinois."

Create important incentives for natural infrastructure

Congress should build upon existing laws that require the Army Corps to increase the use of natural features and nature-based solutions in Army Corps projects. WRDA 2016 (Section 1184) and WRDA 2018 (Section 1149) both included important provisions requiring USACE to consider natural and nature-based features in place of more traditional grey infrastructure. These authorities unfortunately are not being adequately implemented. USACE often screens out natural alternatives early in its planning process before any benefits can be analyzed. Natural features and nature-based approaches can be more cost effective. Restoring or protecting sand dunes, wetlands, barrier islands and coastal forests in place of traditional human built projects like levies, jetties, groins and bulkheads are also more sustainable than traditional structural approaches, more resilient to a changing climate, provide multiple benefits to communities where they are applied, reduce operations and maintenance requirements and reduce post-disaster spending. We believe that Congress should create important incentives to increase the use of natural infrastructure through providing consistency in cost-sharing requirements. In the upcoming WRDA bill, Congress should clarify that natural infrastructure projects receive the same cost-share requirements as nonstructural projects.

Modernize the criteria to account for all costs and benefits associated with projects

Currently, the Army Corps benefit-cost ratio (BCR) analysis does not accurately account for all the costs and benefits of Army Corps projects. Actual project costs for traditional infrastructure projects are often significantly higher than the projected costs used to determine a project's BCR. The current BCR process used by the Army Corps also underestimates the benefits of natural infrastructure projects and does not consider the costs associated with lost ecosystem services from the construction of traditional infrastructure projects. Congress should modernize the criteria used to assess the costs and benefits, and direct outside technical review of Army Corps' BCRs to ensure accuracy.

Help rural and urban frontline communities reduce storm damage and prepare for flooding

Recent extreme weather events have shown that flooding and rain events are more intense and frequent. This is particularly concerning in the Great Lakes region where the lakes have been at their highest levels

ever recorded. Flooding and eroding shorelines are a problem across the basin with communities in Illinois, Indiana, Michigan, Minnesota, New York, Ohio, Pennsylvania, and Wisconsin facing an enormous challenge of dealing with high lake levels only seven years after trying to figure out how to deal with lake levels that were at record lows. Many Great Lakes communities – rural, communities of color, low-income – that are already most at risk from these changes are also the same communities where finding resources to deal with these challenges is an issue. To help communities that are disproportionately impacted, we urge Congress to give the Army Corps better tools (E.g., cost share waivers) to assist these communities and increased flexibility to consider other project benefits so every community can prepare for future flooding and heavy rain events.

Thank you for considering these priorities in the upcoming WRDA bill. If you have any questions, do not hesitate to contact Chad Lord the Healing Our Waters-Great Lakes Coalition policy director at clord@npca.org with questions.

Sincerely,

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