Michigan Resource Stewards

7097 W Mount Hope Hwy

Mulliken, Michigan

April 9, 2019

Lt. Colonel Gregory B Turner

U.S. Corps of Engineers Detroit District

477 Michigan Ave, Suite 700

Detroit, MI

48226

Dear Lt. Colonel Turner:

The Michigan Resource Stewards (Stewards) is an organization founded by natural resource and environmental professionals who spent years working or volunteering in the public and private sectors managing and protecting our natural resources and environment. The organization was formed in 1997 and has earned a strong reputation as an organization that uses sound science and years of aggregate experience of its members (approximately 5,000 years of member experience in resource stewardship) to advocate for protection and sustainable use of natural resources.

The Corps of Engineers (COE) has been contracted by the Great Lakes Fisheries Commission (GLFC) to review and assist in the design of a Adjustable Hydraulic Structure (AHS) for placement in the Grand River in Grand Rapids, MI for the purpose of controlling upstream movement of sea lamprey. The proposed AHS would be located between Ann and Leonard Streets at a present projected cost for the structure of $45 million dollars

 It is the opinion of the Stewards biologists and administrators this structure most likely will not prevent upstream movement of lampreys and will result in significant major financial economic impact to the Great Lakes fisheries programs estimated by the GLFC to be worth $7 billion dollars. And, it is projected by the GLFC if the AHS fails it will cost between $1.4 and $1.7 million dollars annually to treat the stream system above the AHS if it fails. Failure of the structure will result in significant increased lamprey predation in the Great Lakes even with treatment.

The dam is owned by the City of Grand Rapids and was originally placed in the Grand to provide power for the city and the developing furniture industry in the mid-1800s. It is assumed due to its age it is in deteriorating condition but there is no engineering evidence to support this conjecture. The placement of the AHS would include the removal of the Sixth Street dam to restore the rapids in the river to encourage white water events and improve flood control. The Sixth Street dam in downtown Grand Rapids is presently the upstream limit of sea lampreys in the Grand River.

The COE reviewed available data on AHS they considered to have been placed in similar river situations in 2016. The report titled ***Grand River Sea Lamprey Barrier Initiative-A review of Proposed Design*** concluded the structure was unlikely to function in a stream as large as the Grand River and with its climatic and flow conditions. The report did not address stopping lampreys that can move through very small holes as small as one inch in diameter. Canadian scientists also recommended against this proposal in a report in May of 2017 titled ***A Review of the Operating History of Adjustable Crest Inflatable and Velocity Barriers to Control Sea Lampreys in Three Canadian Tributaries to the Great Lakes.***

While the Stewards do not believe the AHS will function as planned, we suggest that if the GLFC and City of Grand Rapids insist on moving forward with removal of the Sixth Street dam that the AHS be placed downstream of the existing dam and be in place for at least two years before the Sixth Street dam is removed. Doing so would allow for evaluation of the effectiveness of the AHS for controlling upstream movement of sea lampreys. If it does not function as planned, the Sixth Street dam should remain in place and any structural problems addressed. This suggestion would also allow for removal of the smaller dams and adjustments to existing flood control walls to proceed while the evaluation is being made.

We look forward to hearing from you in the near future on this proposal.

Sincerely,

Mindy Koch, President

Michigan Resource Stewards

Cc-Gretchen Whitmer, Governor

 Robert Lambe, Executive Secretary GLFC

 Rosalynn Bliss, Grand Rapids Mayor