The Illinois Chamber of Commerce represents small, medium, and large businesses from a variety of industries. Our position regarding the Brandon Road Lock & Dam proposed plan is a result of consultation with our members and a multitude of stakeholders. While we are thankful for the extension of the public comment period to review the proposed plan and the efforts the Army Corps has made to limit the construction period’s impact on waterways commerce, we remain concerned about the planned structural mitigation efforts.

The Illinois Chamber of Commerce is committed to working with federal, state, and non-governmental stakeholders to develop a plan that supports commerce along the Chicago Area Waterways (CAWS) and prevents the spread of Aquatic Invasive Species (AIS). However, the Army Corps of Engineers has not fully explored all available prevention mechanisms and has not adequately addressed concerns about the safety and efficacy of the proposed structural mitigation efforts.

Our members are concerned that the electric barrier represents too great a life and safety risk and that the other structural alternatives proposed would significantly impact transit time through already congested locks without offering any guarantee that Asian carp populations will be kept from entering the Great Lakes. The ballooning cost of the project—nearly doubling to $778 million—is a further cause for concern.

The Illinois Chamber asks that the Army Corps of Engineers:

* Immediately increase support to expand the commercial harvesting program by the Illinois Department of Natural Resources (IDNR), which has already proven effective.
* Without delaying existing and already authorized inland waterways projects, specifically the LaGrange and Peoria locks and dams on the Illinois River, and other projects such as those specified by the Navigation and Ecosystem Sustainability Program (NESP), consider the construction of a new 1200’ lock at Brandon Road instead of the engineered channel.

The costs of the structural alternatives within the proposed plan—as well as their proposed timelines and impact on commercial navigation—is of great concern to our members who rely on all components of our nation’s transportation system to attract and retain workforce and move their products. Impacts to any part of this system—roads, bridges, air freight, railroads, pipelines, or waterways—impacts every other mode. Furthermore, the proposed plan is clear that no proposed alternative has 100% prevention or is effective at every stage of life,

IDNR’s commercial harvesting program has proven successful: reducing the Asian Carp population by 68% and holding the population front 47 miles from Lake Michigan. These actions lower the Asian carp population by directing them to food sources away from the Great Lakes. Expanding support for IDNR’s efforts requires less reliance on burdensome and often delayed federal action, planning, and construction. Their ability to act sooner rather than later will continue to reduce the pressures of the Asian carp population from northern movement, directing them away from the lakes and confining them to the rivers.

Increasing support for the non-structural alternative also carries significantly less risk to the men and women who work in commercial navigation. While the TSP states that the electric barrier will not be in continuous operation, public statements by the Army Corps have strongly suggested future changes in procedure and constant operation of the electric barrier.

Constructing a second lock at Brandon Road is an unrecognized and unassessed option that could provide significant business support—provided that it does not divert any resources away from existing authorized projects on the Illinois River, the Inland Waterways Trust Fund, NESP, or other waterways assets. Previously authorized and identified improvements, including those at the LaGrange and Peoria locks must continue without delay or interruption. Delays to these projects resulting from Brandon Road would immediately negate any support and result in the consideration of additional actions.

The potential economic consequences of the proposed plan are not well understood because the Corps’ proposed plan does not include an economic analysis. Given the volume of goods shipped on the Illinois River, the economic consequences could be large. In November of 2017 the State of Illinois Department of Transportation released their draft freight plan prior to its submission to the U.S. Department of Transportation. This document provides the most up-to-date information regarding existing and future freight flows in, out, and within Illinois in 2014 while projecting freight movements in 2045.

As the third largest state in the nation for volume of freight, 1.23 billion tons of freight was moved in, out, and within Illinois with a combined value of $2.79 trillion in 2014. By 2045 projections show the amount of freight increasing to 1.72 billion tons, an increase of 40% while the value of this freight is projected to increase to $4.34 trillion, a 56% growth in total value.

Illinois waterborne traffic in 2014 was 107.8 million tons, roughly 9% of the total freight tonnage in the state. While 74% of this waterborne freight is outbound from the state of Illinois today, inbound waterborne shipments are expected to grow the fastest. Illinois is the transportation hub of North America with access to 6 Class I railroads, commercial navigation, and interstate highways. As a result, the lock closure windows identified by the TSP will wreak havoc on the broader transportation system.

Cook County, the largest Illinois county by population, is home to multiple rail yards and one of the most congested areas of the country. It will also see the largest growth of freight tonnage in the future. The shock of shifting freight tonnage from one mode to another will have a significant and detrimental impact on all modes of freight and the ability of people to move throughout the region and the state.

At a time when state and federal infrastructure is woefully underfunded, a mode shift of that magnitude will strain every mode of freight transportation. Congestion in the Chicago, IL, region alone annually costs road users more than $7 billion in lost productivity with an additional 60 hours a year stuck in traffic. There remains a significant lack of capacity on Illinois roads and railroads to handle quantity of freight that the waterways moves.

The Illinois Chamber of Commerce remains committed to working with the U.S. Army Corps of Engineers, the State of Illinois, and other government and the multitude of diverse non-government entities on this issue.

Sincerely,

Rebecca Mason

Director of Policy

Executive Director, Infrastructure Council