



November 18, 2022

Colonel Jeremy J. Chapman  
Commander/ District Engineer  
USACE Mobile District

Dear Colonel Chapman:

The Alabama Rivers Alliance and American Rivers respectfully submit this introductory letter as stakeholders of the Alabama River Fish Passage Study process and on behalf of the undersigned organizations who have an interest in this project either as environmental focused organizations, scientists, recreational users of the river, or community stakeholders.

First, we would like to thank the Army Corps of Engineers (USACE) for taking on this important project. The ecological and cultural significance of reconnecting the Cahaba River to the Gulf of Mexico cannot be overstated.

### **Study Alternatives**

We understand that the USACE is in the process of narrowing the alternatives that will be studied as part of this project. As environmental and community-based stakeholders, we recognize that these dams have been in place for a long time and have significant economic and cultural value to those who live around them. That is why it is essential that all alternatives studied include, not only the ecological and economic costs and benefits, but the cultural and community cost and benefits as well.

According to a recent Southern Science news articles,<sup>1</sup> the alternative of dam removal appears to have already been arbitrarily dismissed from the alternatives to be studied, with no public input or reasonable rationale. As stakeholders, we highly encourage you to conduct a transparent public process and study the full breadth of alternatives which would not be complete without including dam removal as one of the studied alternatives. We want to ensure that the USACE is truly committed to the best outcome of restoring fish passage to this river

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<sup>1</sup> Cromwell, S. (2022, August 7). *River, interrupted*. Southern Science. Retrieved November 18, 2022, from <https://southern-science.com/2022/08/06/dam-disconnect/>

system in balance with other goals. It is particularly important that if the alternative of “no action” is on the table, which we know has not been successful in allowing fish passage, then dam removal should also be considered to provide that full balance since that is the only proven alternative to fully ensure fish passage.

### **Cost Analysis**

The stakeholders also strongly recommend that the cost of operations and maintenance (O&M) of the system as it currently exists along with O&M over time should be considered when studying the various alternatives. Both Miller’s Ferry and Claiborne lock and dams were built in the 1970s. Commercial navigation has been nonexistent on the river for more than a decade and before that it was declining for decades. The cost of operating these 50+ year old locks and dams falls squarely on the USACE and will continue to come from taxpayer dollars throughout the life of the dams under any alternative other than dam removal. These realities must be counted in the cost analysis to fully represent the true cost of the other alternatives balanced against dam removal. Including these costs over time will provide a more balanced and accurate representation of all of the alternatives.

As stated above, we also strongly recommend that all cost analysis include the cultural and community cost and benefits of the various alternatives. Ignoring these costs and benefits will result in an incomplete picture of the alternatives and could lead to resistance to implementation of whichever alternative is determined to be the best option.

### **Public Involvement**

The stakeholders would like to see a timeline for the remaining 2+ years of this project including where and how transparent public involvement will be included as part of the process. In our experience with federal projects, the public involvement part of the project is an essential piece and is more successful when the stakeholders, including local residents, businesses, environmental groups, community groups, etc. are part of the process as early as possible and ongoing throughout the process. This type of interaction will result in a better outcome for everyone involved and, hopefully, one that stakeholders have all had input in deriving. According to a recent Alabama Daily News article,<sup>2</sup> the navigation interest stakeholders have already been included in some of the meetings regarding study alternatives. It is unclear why some stakeholder interest has been included and others have not at this point. Alabama Rivers Alliance and American Rivers have organized a group of interested stakeholders that stand ready to assist in ensuring successful stakeholder involvement throughout this process. There are

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<sup>2</sup> Sell, M. (2022, October 12). *Army Corps studying dams, fish flow in Alabama River*. Alabama Daily News. Retrieved November 18, 2022, from <https://www.aldailynews.com/army-corps-studying-dams-fish-flow-in-alabama-river/>

likely additional stakeholders that also wish to be part of this process, therefore it is important to know when and how stakeholder input is being incorporated into the study.

Our organizations do not now have enough information to advocate for any particular alternative, and we do not advocate for any particular position here; however, failing to offer all obvious and reasonable alternatives threatens to invalidate the process of choosing any alternative.

We appreciate your consideration of these introductory comments and we look forward to hearing from you about how we can assist further in a fair and project-appropriate process that includes broad input and development of all reasonable alternatives.

Sincerely,

A handwritten signature in black ink, appearing to read 'Cindy Lowry', with a stylized, cursive script.

Cindy Lowry

Alabama Rivers Alliance

American Rivers

Alabama River Diversity Network

Cahaba Riverkeeper

Cahaba River Society

**Alabama Rivers Alliance**

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