

Thank you for your comment, Robert Smith.

The comment tracking number that has been assigned to your comment is GLMRISANS50014.

Comment Date: January 23, 2012 15:31:28PM

GLMRISANS

Comment ID: GLMRISANS50014

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Attachment: USACE invasives, 23 Jan 12.doc

Comment Submitted:

RE: Table 1. ANS of Concern---CAWS

Your ANS list contains species recognized as invasive and deleterious to Great Lakes ecology and economy, or both. It is suggested that you include three additional nuisance plant species that wreak havoc in the Great Lakes Basin. Two significantly alter shorelines: non-native *Phragmites australis* (Common reed) and *Typha angustifolia* (Narrow-leaf cattail). The third, *Myriophyllum spicatum* (Eurasian watermilfoil) rapidly develops as a macrophyte monoculture displacing native macrophytes and stressing fish populations. While we realize your primary immediate target is the bighead carp, millions of dollars are spent annually to manage the above three species.

Our Watershed Council position on Bighead Carp management was initially presented to you in Feb 2011 and is attached here for your convenience.

Please expedite your program and move on this issue!

Regards,

R.A. Smith

President

Les Cheneaux Watershed Council

...protecting, conserving and restoring our water-based resources.



23 January 2012

Les Cheneaux Islands Watershed Council recommendations to the U.S. Army Corps of Engineers regarding its preparation of an environmental impact statement for the Great Lakes and Mississippi River Interbasin Study.

The Les Cheneaux Watershed Council (LCWC) recommends an ecological separation of the Great Lakes and Mississippi watersheds as a preferred and permanent, long-term solution to protect the two watersheds from the transfer of all aquatic nuisance species between the basins. This position is in agreement with and in support of similar recommendations by the Great Lakes Council and Great Lakes United.

Hydraulic separation of the basins is critical. Whereas final reports of the three phase project proposal are scheduled December of 2011, we strongly urge that an implementation schedule is included, the first phase of which will be immediate construction of a temporary total blockage of the Chicago Sanitation and Shipping Canal (CSSC). This is the most probable waterway to permit passage of nuisance aquatic organisms and needs to be dealt with first.

It is not an environmental impact statement that is immediately needed. An action plan to prevent the interbasin transfer of aquatic nuisance species is crucial. Now.

Priorities for the US Army Corps of Engineers (USACE) in 2011 need to be:

- 1) Immediate hydraulic blockage of the Chicago Sanitary and Ship Canal.
- 2) Complete CSSC hydraulic blockage plan by June 2011.
- 3) Implement prevention plan by September, 2011.

Following initial blockage of the CSSC more permanent activities can be undertaken to develop the ecological separation plan which should be completed over a maximum of five years.

We realize that normal Chicago River traffic will be slowed, but not stopped, by physical total blockage of the river if proper planning is done. One approach is for upbound or downbound commercial vessels to offload their cargo to rail cars and to complete deliveries by rail or truck. Upbound or downbound recreational vessels can use a version of the boat transport used for the Trent-Severn hoist and trolley. During their time out of the water recreational vessels will have their hulls disinfected and cleaned before re-entering the waterway.

Finally, the entire Great Lakes Basin will benefit by elimination of all aquatic nuisance organisms from entering the system. Towards this end we recommend development of a Great Lakes shipping fleet. Such a fleet will carry all goods on the Great Lakes. They will offload/load cargo to/from foreign vessels only in brackish water at suitable locations in the St. Lawrence Seaway. No foreign vessels will be permitted to enter the Great Lakes

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waterways on a routine basis. Some exceptions may be granted on a one-time basis whereby stringent bilge disinfection procedures must be undertaken.

Officials from states of the Great Lakes and Mississippi River Basin have known of the potential and ecological and economic dangers of invasive aquatic species movement between the systems since the opening of the Welland Canal over fifty years ago. Given the latest Asian Carp threat, for the USACE to take less than the above stated immediate action is criminal.

We wish the USACE success with expedient development and execution of a realistic and timely plan to eliminate the scourge of invasive aquatic organism invasion of interior USA waters.

End.