

Thank you for your comment, Lisa Frede.

The comment tracking number that has been assigned to your comment is GLMRISANS50163.

Comment Date: February 17, 2012 09:02:39AM

GLMRISANS

Comment ID: GLMRISANS50163

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Attachment: CICI Comments on GLMRIS ANS Controls 02 08 12 FINAL.doc

Comment Submitted:



**Chemical Industry
Council of
Illinois**

February 17, 2012

Mr. David Wethington
Project Manager
Chicago District, U.S. Army Corps of Engineers
111 North Canal Street
Chicago, IL 60606

RE: GLMRIS: Inventory of Available Controls for Aquatic Nuisance Species of Concern in the Chicago Area Waterway System (CAWS) Comments

Dear Mr. Wethington,

The Chemical Industry Council of Illinois (“CICI”) is a statewide trade association representing the chemical industry in Illinois. CICI represents 221 member companies employing over 45,648 workers at an average annual wage of \$80,748 in 726 manufacturing facilities and 877 wholesale and distribution facilities in Illinois. CICI appreciates the opportunity to comment on the Great Lakes Mississippi River Interbasin Study (GLMRIS): Inventory of Available Controls for Aquatic Nuisance Species of Concern in the CAWS that the U.S. Army Corps of Engineers (USACE) released in December 2011. **CICI encourages the USACE to focus their efforts on actions that will protect both the environment and the economic viability of the region.**

CICI has been very involved in many of the Asian carp/electric barrier issues. CICI sits on the dispersal barrier safety committee; the Technical and Policy Advisory Group; sat on the Great Lakes Commission study stakeholders group and participated in numerous industry stakeholders’ conference calls. CICI has also submitted several comments to USACE and USEPA regarding economic impacts to the chemical industry; USACE Interim III and IIIA reports; Asian Carp Regional Coordinating Committee (ACRCC) draft management report draft 1; and now the GLMRIS report regarding the “Inventory of Available Controls for Aquatic Nuisance Species of Concern – CAWS”. CICI believes that the best results for suppression and prevention of further movement of the Asian carp into the Great Lakes basin will rely on a multi-tiered approach of technologies throughout the Mississippi basin access points.

CICI does not believe that a permanent barrier in the Chicago Area Waterway System (CAWS) will keep aquatic nuisance species out of the Great Lakes or Mississippi Basins. The CAWS was originally created for removal of wastewater away from Chicago and Lake Michigan but it also became a highly useful means to transport goods through the Midwest via barges. And in the past several years, the Chicago Metro area has come to rely on the CAWS as a way of quickly removing rainwater that causes major flooding to the area.

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CICI has 19 members that are directly in the CAWS study area and these facilities rely on the barge industry to accommodate their raw material and finished product needs. By relying on barges, the chemical industry lessens its carbon footprint and ensures that the raw materials and final products are transported in a safe and environmentally friendly way.

CICI appreciates the USACE's effort to identify available options and technologies, or controls, which may be implemented in the CAWS to prevent the transfer of ANS. CICI understands that this paper does not thoroughly evaluate each control's "constraints for application, regulatory requirements, technological feasibility or impacts due to application," nor does it rank their effectiveness. However, CICI would like to make the following recommendations to the GLMRIS Team as it begins to develop screening criteria and formulate and evaluate alternatives comprised of one or more of the available controls.

CICI believes that the number and diversity of ANS controls identified by the Tech Team affirms the achievability of selecting preferred alternatives that effectively prevent the transfer of ANS while protecting the economic viability to the CAWS. The majority of listed controls can be applied in the CAWS without significant disruptions to commercial vessel traffic and thus, to the chemical facilities.

Therefore, **CICI strongly urges the USACE to include negative impacts to navigation, as well as other uses of the CAWS such as recreation, water quality, and flood control, as screening criteria for use in its determination of which controls warrant further consideration.** This is entirely consistent with GLMRIS objectives to study the feasibility of the range of options and technologies available to prevent ANS transfer. Controls that impair or eliminate the movement of critical commodities along the CAWS, which generates billions of dollars for the U.S. economy annually, cannot and should not be considered feasible alternatives.

In particular, CICI believes any control that prevents ANS transfer by modifying the flow conditions of the CAWS is likely to substantially affect the safe and efficient operation of commerce in the waterway system. There are other available controls, such as lethal water temperature, which appear to be highly effective at targeting multiple organisms of concern in the CAWS and would not result in the long-term interruption of waterways transportation and recreation.

CICI agrees with the American Waterway Operators (AWO) in their recommendation that the USACE screen the available options and technologies based on their implementation costs, including research and development, permitting, construction, and operation and maintenance costs. Controls that would cost more money to implement than the USACE can reasonably expect to be available

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are not feasible. CICI encourages the USACE to continue to use “risk reduction” as a guiding principle for the study. It is the most logical and practical way to evaluate appropriate actions and most effectively allocate the scarce state and federal resources available.

CICI appreciates the complexity and challenges that are relative in the scope of the GLMRIS: Inventory of Available Controls for Aquatic Nuisance Species of Concern in the Chicago Area Waterway System (CAWS) report. CICI would like to offer its continued support and interest in the development and implementation of solutions that protect the environment and the economy.

CICI appreciates the hard work and dedication of the GLMRIS team in their fight to suppress the Asian carp. We recognize the challenging environment that this situation places the GLMRIS team in, and would like to reiterate our interest in helping the involved agencies develop and follow through on solutions that protect the environment and the economy. CICI and its members are willing participants in assisting in the fight and answer any questions that the GLMRIS team should have.

Respectfully submitted,

Lisa Frede
Director of Regulatory Affairs
Chemical Industry Council of Illinois

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