

Thank you for your comment, Mark Biel.

The comment tracking number that has been assigned to your comment is GLMRISANS50164.

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GLMRISANS

Comment ID: GLMRISANS50164

First Name: Mark

Middle Initial:

Last Name: Biel

Organization: CICI

Address: 400 W. Monroe

Address 2: Suite 205

Address 3:

City: Springfield

State: IL

Zip: 62704

Country: USA

Privacy Preference: Don't withhold my personal information from the website and NEPA documents

Attachment: Mark Biel ANS Comments to GLMRIS.docx

Comment Submitted:



www.unlockourjobs.org

GLMRIS ANS Control Comments
111 N. Canal, Suite 600
Chicago, IL 60606

Submission by Mark Biel, Chairman of the UnLock Our Jobs Coalition

These comments are submitted in response to the public report - "Inventory of Available Controls for Aquatic Nuisance Species of Concern - Chicago Area Waterway System," an Interim Product of the Great Lakes and Mississippi River Interbasin Study (GLMRIS).

The management of aquatic nuisance species is a complex problem. There is no single, silver bullet solution that will address this issue. Cataloging the multitude of control options available to address invasive species threats is an important step in developing a comprehensive, multifaceted control plan.

I am concerned that this report minimized, or at least excluded, several key weaknesses with the most controversial potential control option being evaluated – namely hydrological separation. Specifically, I was disappointed that the report failed to highlight:

- Separation is not a solution for the most pressing invasive species threat – Asian carp. The timeline for achieving separation, if it's feasible at all, is several decades. This important consideration makes separation irrelevant for addressing many of the most pressing current invasive species threat, including Asian carp.
- The effectiveness for transfer prevention is highly questionable. As noted in the GLMRIS fact sheet, if a storm produces waters that exceed the designed separation barrier, water and Asian carp could spill overtop the barrier and/or flow around it. Additionally, human transport of fish and other invasive species could instantaneously render the decades and billions of dollars in capital costs futile.
- Hydrologic separation would only address the aquatic pathways in Chicago. A previous portion of the GLMRIS research identified *eighteen* potential pathways outside of Chicago by which Asian carp could reach the Great Lakes. Hydrologic separation would fail to address all possible areas by which the Asian carp could transfer between basins.
- Implementing separation requires substantial negative trade-offs. Undoing the CAWS system, one of the most advanced engineering projects in the region, would significantly alter 1) water quality in Southern Lake Michigan, 2) regional transportation and traffic, 3) drinking water sources and flood control systems for millions of regional residents, and 4) the availability of resources for other control efforts, given the high cost of this single proposed control element.

While I understand further study to quantify and evaluate these potential trade-offs is underway, it's critical these limitations be included, or at least recognized in interim reports. Government officials and stakeholders must be made aware of the known limitations of separation as decisions are made today about funding and supporting near term solutions for the Asian carp threat.

Un-Lock Our Jobs was founded to protect the uninterrupted operation of the "Avenue of the America's" – the essential waterway connection between the Great Lakes and the Mississippi River corridor. A project of the Chemical Industry Council of Illinois, Un-Lock Our Jobs is a coalition of agriculture, business, labor, river communities, and concerned citizens working towards a comprehensive solution to stop the spread of Asian Carp, while leaving the Chicago locks open to commerce.

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Recognition of the limitations of separation is a particularly poignant concern given a proposal recently released by the Great Lakes Commission (GLC) that I understand you are considering using during the GLMRIS review process. Those involved and supporting the GLC study set out with a clear consensus in mind that hydrologic separation is the *only* solution for invasive species control. While I believe the GLC's cost and timeline estimates to be understated – both make it clear that separation cannot be completed in a timely manner, and would require a massive diversion of financial resources that would likely make the more than 100 other comprehensive control strategies you've outlined impossible to fund.

We appreciate your recognition of these important facts concerning hydrologic separation, and appreciate your commitment to fully exploring the options as well as the effectiveness and implications for each one. The diligence and thoroughness of the GLMRIS team in addressing the problem of invasive species serves as a strong reminder to policymakers and stakeholders that if we embrace a comprehensive, strategic solution to invasive species, we can control them over the long term.

Please contact me if you have any questions. Thank you again for your continued efforts on this important issue.

Sincerely,

Mark Biel
Chairman, UnLock Our Jobs Coalition

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