

Thank you for your comment, Robert Hirschfeld.

The comment tracking number that has been assigned to your comment is GLMRISANS50169.

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GLMRISANS

Comment ID: GLMRISANS50169

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Attachment: PRN comments ANS control.pdf

Comment Submitted:

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February 17, 2012

Mr. David Wethington  
U.S. Army Corps of Engineers  
111 North Canal Street, 6th Floor  
Chicago, IL 60606

**RE: Comments regarding the Aquatic Nuisance Species Control Paper: “Inventory of Available Controls for Aquatic Nuisance Species of Concern - CAWS”**

Dear Mr. Wethington,

Prairie Rivers Network offers the following comments to elaborate on suggestions submitted earlier during the NEPA scoping phase of GLMRIS by ourselves and by others. They are offered in the spirit of suggesting ways to accelerate the timetable for completing the GLMRIS study, and inspired by the desire to avoid wasting the large amounts of time and money apparently needed to complete the analyses started in the “ANS Control Paper.”

The economic benefits of separating the Great Lakes and Mississippi River basins are extremely difficult to estimate. For example, it is virtually impossible to quantify the extent of damage that would be caused by Asian Carp if they establish a reproducing population in the Great Lakes. In fact, such benefits are scientifically unknowable because it is impossible to predict how a species' behavior (e.g. feeding, reproduction) will change after entering a totally foreign environment. Since science cannot predict ANS behavior post-invasion, estimates of the economic benefits of preventing invasions must be based on assumptions that introduce massive uncertainties that can dwarf the science-based estimates of cost.

The uncertainties associated with project benefits are exacerbated further by the Principles and Guidelines issued in 1983 pursuant to the Water Resources Planning Act, which require the Corps to maximize the present worth of Net Economic Development Benefits, i.e. (B-C). When the uncertainty of benefits dwarfs that of costs, the smaller difference (B-C) will be reduced to a nearly meaningless number because the uncertainties will be so large.

Fortunately, in the context of the GLMRIS assessment of economic impacts, the benefits of preventing ANS transfer are identical – by definition – for all the options that meet the prevention mandate. Therefore to maximize (B-C) it is only necessary to minimize C; that is, to select the least-cost option for meeting the prevention mandate.

This suggestion is perfectly consistent with the Principles & Guidelines that govern planning and evaluation efforts conducted by the Corps of Engineers when planning flood control, drainage and water supply projects.

Chapter 1 of the guidance document states the objective: *The Federal objective of water and related land resources planning is to contribute to national economic development consistent with protecting the Nation's environment (USACE, Economic and environmental principles and guidelines for water and related land resources , implementation studies|| Chapter 1 Section IIa, 1983).*

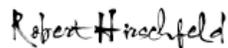
Chapter 2 of that document describes the procedure for quantifying the national economic development (NED) benefits of a project: *Net NED benefits of the plan are calculated in average annual equivalent terms. [by subtracting the present value of the cost stream from the benefit stream, and levelizing over the project life].*

The same approach is commonly employed when costs can be quantified more easily than benefits. For example, because the economic benefits of national security are difficult to quantify, Congress defines the desired level of security in non-economic, often qualitative terms, so DOD and DHS can compare the costs of alternative ways of achieving it. In the case of GLMRIS the goal has been defined by Congress (prevent ANS transfer via the CAWS) so it is now up to the Army Corps to determine the least-cost alternative means of meeting that mandate.

Sincerely,



Clark Bullard  
Board of Directors  
Prairie Rivers Network



Robert Hirschfeld  
Coalition Organizer  
Prairie Rivers Network