Thank you for your comment, Jared Teutsch.

The comment tracking number that has been assigned to your comment is GLMRISANS50175.

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Comment ID: GLMRISANS50175

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Comment Submitted:

Alliance for the Great Lakes*Environment Illinois*Freshwater Future*Friends of the Chicago River*National Wildlife Federation*Natural Resources Defense Council*Ohio Environmental Council*Prairie Rivers Network*Sierra Club – Illinois Chapter

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 (ANS) Control Paper: "Inventory of Available Controls for Aquatic Nuisance Species of Concern - CAWS" through the Great Lakes and Mississippi River Interbasin Study (GLMRIS**)

Dear Mr. Wethington,

Please accept these comments submitted on behalf of the Alliance for the Great Lakes, Prairie Rivers Network, Sierra Club – Illinois Chapter, Environment Illinois, Friends of the Chicago River, National Wildlife Federation, Natural Resources Defense Council, Freshwater Future, and Ohio Environmental Council, as well as our hundreds of thousands of members across the Great Lakes and Mississippi River basins and nationwide, regarding the U.S. Army Corps of Engineers (Corps), Great Lakes and Mississippi River Interbasin Study (GLMRIS) development of the Aquatic Nuisance Species (ANS) Control Paper.

The undersigned organizations appreciate the opportunity to comment. While we have several recommendations to improve the GLMRIS ANS Control Paper, which are highlighted below, we would like to first express that the overarching goal for GLMRIS and addressing the transfer of ANS must be a permanent solution to this ongoing crisis.

The only permanent and sustainable prevention method to this problem is hydrologic separation of the Great Lakes and the Mississippi River basin (outlined as one of the preventive methods in the GLMRIS ANS Control Paper). Very simply, if water does not flow between the two great watersheds, aquatic plants, animals and diseases will not be able to migrate actively or passively between the two. If done right, hydrologic separation will leverage viable, well-planned investments to establish new, globally-competitive transportation infrastructure as well as upgraded treatment of wastewater and storm water.

The result can be a revitalized Chicago Area Waterway System (CAWS) that not only closes the highway for invasive species, but also enhances Chicago‘s transportation system, creates local and regional jobs, reduces business costs across the region, and improves water quality, tourism, and recreation.

The ANS report credibly and persuasively displays the shortcomings of many hypothetical control technologies. The effectiveness of hydrologic separation stands in stark relief against these makeshift, piecemeal control measures. None of the other options examined in the ANS Control Paper appear calculated to achieve complete prevention of invasive species transfers through aquatic pathways in the Chicago Area Waterway System. Given that, we urge the Corps to focus its attention on those solutions which fully prevent against the two-way transfer of all ANS organism types and species. This is consistent with the mandate provided by Congress in the 2007 authorization for GLMRIS.

Focus On Prevention

It is beyond the scope of the Army Corps' statutory authorization for the GLMRIS study to look at any solutions that would not achieve "prevention," and it is not clear at this time that any alternative other than hydrological separation would do so. The GLMRIS ANS Control Paper lists several solutions that would be more appropriate for long-term management of established aquatic invasive species – not prevention. These include:

- Any form of mechanical harvesting, fishing, netting, or other removal techniques are designed for aquatic habitats that have a viable population base of the target nuisance species. This is not a form of prevention but rather a way to manage already-established ANS populations and attempt to limit their spread.

- All forms of biocides and toxins that would significantly harm the waters as well as the plants, animals and possibly people that depend on them. These are clearly not viable for prevention measures, and we urge the Corps not to waste undue time or expense investigating these options.

In addition, the ANS Control Paper lists certain types of solutions that can only be used for specific taxonomic categories or species. For example, pheromones are listed as a potential preventive solution as an attractant or repellent for various fish species. This seems better suited for early detection and eradication methods for specific species like Asian carp – not broad ANS prevention. We urge the Corps to disregard any species specific solutions and instead focus on broad preventive measures.

Interim Prevention Measures

A few solutions listed in the ANS Control Paper do have a potential for short-term or interim prevention. These include:

- Accelerated water velocity has the potential to be a useful interim measure for one-way separation by preventing upstream ANS movement. However, the length and speed of

flow may limit the overall viability of such an option on the Chicago Area Waterway System (CAWS).

- Pressurized hot water/steam treatment or a hot water thermal barrier could be useful if used in conjunction with locks. The water filling a lock would be heated to levels necessary to kill all potential ANS. This may be difficult given the amount of water necessary in the lock chamber.
- A vertical drop barrier to prevent the upstream movement of ANS. This would not be two-way prevention and would still allow ANS movement downstream.

Cost-benefit analysis of the control technologies should be applied only to those measures which meet the above standard of full prevention. And, since the qualitative benefits of those measures are the same for all options—prevention of ANS transfer—the Corps should focus its analysis on the comparative costs of those options which are fully effective.

Again, we thank you for your work in GLMRIS and for the opportunity to engage with you at this critical moment in the fight against Aquatic Nuisance Species.

Sincerely,

Jared Teutsch
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