

Thank you for your comment, Olivia Dorothy.

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GLMRISANS

Comment ID: GLMRISANS50178

First Name: Olivia

Middle Initial: M

Last Name: Dorothy

Organization: Izaak Walton League of America

Address: 1115 17th St #3

Address 2:

Address 3:

City: Moline

State: IL

Zip: 61265

Country: USA

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

Attachment: Comments on GLMRIS Study FINAL.doc

Comment Submitted:



THE IZAAK WALTON LEAGUE OF AMERICA

Great Lakes and Mississippi River Interbasin Study Team:

The Izaak Walton League applauds the efforts of the Great Lakes and Mississippi River Interbasin Study (GLMRIS) Team to develop such an in depth review of barrier technologies that might be used on the Chicago Area Waterway System (CAWS). As the report mentions, the 29 species in the Great Lakes threaten the health of the Mississippi River, and just 10 threaten the Great Lakes. While Asian carp have received the most attention in the press recently, it is the Illinois and Mississippi Rivers that have in the past, and will in the future, suffer greater economic impacts from invasive species transferred through the CAWS.

The League, since its foundation, has been dedicated towards protecting wildlife and resources in the Upper Mississippi River Basin; most notably, the League led the establishment of the Upper Mississippi River Fish and Wildlife Refuge. We continue this work through efforts by our staff and members to engage the public and participate nationally on forums impacting our soil, land, air, wildlife, and water resources. The League supports actions to prevent aquatic nuisance species from migrating between the Great Lakes and Mississippi River because it will improve water quality and natural resources in both basins.

The League generally supports the study, “Inventory of Available Controls for Aquatic Nuisance Species of Concern: Chicago Area Waterway System,” drafted by the GLMRIS Team. However, we would like to suggest some changes to the final study and make some recommendations as the Team moves forward.

1. **Complete hydraulic separation is the most effective way to prevent current and future aquatic nuisance species (ANS) movement between basins.** The Great Lakes Commission (GLC) recently reported (www.glc.org/caws) that physical separation can be completed by 2029 and could cost \$3.26 – 9.54 billion. Species specific barriers are effective, but we must continue to implement new barriers as new species are introduced to each basin. A species specific strategy will create a continuous need for new construction and spending causing costs to escalate. The Corps should implement a barrier technology that will permanently prevent the transfer of all current and future ANS between the basins. The League supports the physical separation alternatives proposed by the GLC, and we encourage the Corps to consider the GLC plan.
2. **Include an implementation timeframe.** The study is the first step towards implementing ANS barrier technologies, but it does not give the public any information on the anticipated timeframe. The threat of ANS is immediate and ongoing and the electric dispersal barrier on the Sanitary and Ship Canal is not effective against all species. Many of the technologies discussed in the study are not ready to be implemented

and several ANS threaten to move between the basins. Providing an anticipated timeframe for barrier development and implementation will help public understanding as the Corps moves forward in the planning and selection process.

3. **Human assisted pathways should be included.** No barrier technology will be effective without a comprehensive public education component. People must learn how to identify ANS and prevent their transfer. Authorization and funding for a barrier must include dedicated funding for education and outreach. Education is undoubtedly the cheapest control strategy and should be included in all planning.
4. **Costs should be described as dollar estimates or ranges.** Each barrier technology fact sheet included a section on “cost considerations.” But no dollar values are provided. Controlling invasive species migration is essential to restore and protect the Mississippi River and Great Lakes and we cannot afford the project be sidetracked because of unanticipated costs. If the Corps can provide estimated costs the League, Congress and taxpayers can begin evaluating potential funding mechanisms.

The League believes that by including the above information in the Study will strengthen the report and help American citizens understand the options available to prevent ANS migration and dispersal. The League also supports hydraulic separation of the two basins to protect the Mississippi River and Great Lakes, two of America’s most iconic waters.

Thank you for considering these comments. If you have questions, please contact me.

Olivia Dorothy
Regional Conservation Coordinator
Upper Mississippi River Initiative
Izaak Walton League of America
odorothy@iwla.org
217-390-3658

