

Thank you for your comment, Cheryl Kallio.

The comment tracking number that has been assigned to your comment is GLMRIS2AP50056.

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Great Lakes and Mississippi River Interbasin Study (GLMRIS)  
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Attachment: Pathways study Freshwater Future comments Oct 2012.pdf

Comment Submitted:

October 1, 2012

U.S. Army Corps of Engineers  
GLMRIS Focus Area 2, Summary Report Comments  
1776 Niagara Street  
Buffalo, NY 14207-3199

Dear GLMRIS Project Team,

Thank you for the opportunity to present comments on the *Focus Area 2: Aquatic Pathways Assessment Summary Report* (Report). We were pleased to see that for nearly half of the pathways, seven out of 18, options were identified that would indeed prevent the spread of aquatic nuisance species (ANS) such as Asian carp.

The Water Resources Development Act of 2007 authorized: “The Secretary (of the Army), in consultation with appropriate Federal, State, local and nongovernmental entities, shall conduct, at Federal expense, **a feasibility study of the range of options and technologies available to prevent the spread of aquatic nuisance** species between the Great Lakes and Mississippi River Basins through the Chicago Sanitary and Ship Canal and other pathways.” Additional guidance was given from the United State Army Corps of Engineers (Corps) headquarters to the Great Lakes and Ohio River Division Commanders to **prevent** the inter-basin transfer of ANS between the Great Lakes and Mississippi River through aquatic pathways. While these directives are clear, the bulk of recommendations and opportunities presented in the Report are focused on risk reduction activities such as monitoring or recreational user education. Some locations have no identified strategies to either reduce risk or prevent the spread of ANS.

The discovery of spawning Asian carp in the Wabash River shows the crisis is worsening and the threat is advancing on multiple fronts. This crisis requires aggressive and immediate action. If invasive, giant Asian carp establish in the Great Lakes, these fish with voracious appetites could wreak havoc on the entire ecosystem, home to 1/5 of the world’s surface fresh water. Bighead and silver carp can quickly take over habitat, out-eating and out-breeding native fish. This could devastate the region's \$7 billion fishing industry and permanently alter the way recreational boaters, anglers and tourists use and enjoy the lakes and their many tributaries.

There are no doubt benefits from risk reduction activities to stopping the spread of ANS. Additionally, we acknowledge that some locations appear to have a low risk for ANS introduction. However, because of the threat Asian carp and other ANS pose to our Great

Lakes, the full WRDA 2007 mandate of identifying prevention opportunities should be completed for all of the 18 pathways. While implementing prevention strategies, such as the creation of barriers, may not be necessary at the moment due to the low risk, having these tactics identified will best prepare us to act quickly and stop the spread of Asian carp and other ANS if the threat grows. Additionally, for these areas, risk reduction activities, such as monitoring, should include some sort of “trigger” or “threshold” at which the threat is no longer consider “low” and serves as a signal that taking action on the identified prevention strategies is recommended.

Not only was *prevention* mandated, it has been supported by tens of thousands of Great Lakes-region residents, who have been contacting their Members of Congress asking for support for the strongest possible protections for the Great Lakes – physically separating the Great Lakes and Mississippi River systems.

Thank you for considering these comments. Should you have any question, feel free to contact me at 231-571-5001 or [Cheryl@freshwaterfuture.org](mailto:Cheryl@freshwaterfuture.org).

Sincerely yours,

A handwritten signature in cursive script that reads "Cheryl Kallio".

Cheryl Kallio, Associate Director  
Freshwater Future