

Thank you for your comment, Kristy Meyer.

The comment tracking number that has been assigned to your comment is GLMRIS2AP50057.

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Great Lakes and Mississippi River Interbasin Study (GLMRIS)
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Attachment: GLMRIS Focus Area 2 Other Pathways Summary response ltr.pdf

Comment Submitted:

**Alliance for the Great Lakes* Clean Water Action – Minnesota* Freshwater Future* Great Lakes United*
National Wildlife Federation* Natural Resource Defense Council* Ohio Environmental Council* Prairie Rivers
Network**

October 12, 2012

Mr. Martin R. Wargo
U.S. Army Corps of Engineers
1776 Niagara Street
Buffalo, NY 14207

Re: Comments regarding the Focus Area 2 Aquatic Pathways Assessment Summary Report

Dear Mr. Wargo,

Please accept these comments submitted on behalf of the Alliance for the Great Lakes, Ohio Environmental Council, Natural Resources Defense Council, OTHERS..., 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 Focus Area 2 Aquatic Pathways Assessment Summary Report (Summary Report).

The undersigned organizations appreciate the opportunity to comment, and provide several recommendations below to improve the Summary Report. At the outset, we would like to reemphasize, in keeping with a letter sent to Assistant Secretary Darcy on October 3 of this year by several of the below-signed organizations, that the overarching goal for GLMRIS and addressing the transfer of Aquatic Nuisance Species (ANS) must be a permanent solution focused on prevention. This is the mandate set forth by Congress within the Water Resources Development Act (WRDA) 2007, which charges the Corps with studying options for "prevent[ing] the spread of aquatic nuisance species between the Great Lakes and Mississippi River basin through the Chicago Sanitary and Ship canal and other aquatic pathways."

The only permanent and sustainable prevention method for this problem is hydrologic separation of the Great Lakes and the Mississippi River basin. Very simply, if water does not flow between the two great watersheds, aquatic plants, animals and diseases will not be able to naturally migrate actively or passively between the two via aquatic pathways. If done right, hydrologic separation will leverage viable, well-planned investments to prevent transfer of ANS while bringing numerous other benefits to the region, such as improved water quality and reduction of flooding.

Uncertainty Arising from Limited Data

It appears that critical data necessary for a thorough evaluation of some ANS pathways was lacking during the Corps' drafting process for the Summary Report. This presents problems for the overall analysis, especially when attempting to prioritize action at other potential pathways for ANS transfer. The apparent gaps in data create problems with the base level equations used by the Corps, making the equations inaccurate. As a result, any composite analyses relying on those equations are similarly inaccurate. These data gaps and ensuing problems include:

- Very limited and often no data regarding the hydrology of these pathways. Without critical hydrological data to inform the risk qualifier, it is not possible to accurately characterize which sites are truly high, medium or low risk sites.
- Potential inaccuracies in the National Wetland Inventory mapping due to resolution and age of the data at some locations. This creates substantial uncertainty in some other pathway areas, especially since outside of the Chicago Area Waterway System, all other potential pathways are associated with known or perceived wetlands and other connecting hydrology.

Use of Existing Data

In addition to our concerns about how the Corps makes decisions in lieu of limited data, we also have concerns that the Corps is improperly weighing the data it has. The probability of ANS becoming established in the Great Lakes through an identified pathway in Focus Area 2 is not an exact science and we recognize the Corps faces challenges when trying to develop a methodology that helps quantify these pathways. However, we do not think it is appropriate for the Corps to award a higher level of risk if a species is able to establish itself in the pathway. This weighting method places significant emphasis on whether or not a species is currently established near or in the potential pathway. It fails to take into account that species naturally move and can do so rapidly. While a species may not be established near or at a pathway today, it does not mean that it will not be established in a year or two. Placing such inappropriate emphasis on one particular criterion-current existence of an aquatic nuisance species in a waterway-can create an artificially low score when all other indicators, particularly and most importantly whether or not a pathway exists, indicate a much higher risk.

The use of species-specific data should also not be a factor. Again, the emphasis of GLMRIS is on preventing the transfer of all species between basins, not just a few. Therefore, we recommend that more emphasis be placed on the type of connection that takes into account whether or not a consistent flow occurs between the pathways and the various characteristics of each pathway.

Cost-benefit analysis of the control technologies associated with these identified pathways should be applied only to those measures which meet the above standard of full prevention, in keeping with the WRDA 2007 mandate. The Corps should then take those costs and weigh them against all the benefits brought to the region, such as flood reduction, improved water quality, and prevention of additional funds needed for ANS reduction and control, to determine the true cost and benefits of each control technology.

Potential Solutions for Existing Pathways

We are pleased to see that nearly half of the pathways - seven out of 18 - include options that could prevent the spread of ANS. The majority, however, outline suggested activities merely to reduce the probability for introduction. While identifying these reduction options are positive steps, WRDA 2007 mandates that the focus be on prevention, rather than reduction of probable inter-basin transfer of ANS. Not only has prevention been mandated, but it has been supported by tens of thousands of Great Lakes residents. We understand that the Corps has to prioritize, but each pathway's recommendations must include options on how to permanently separate the two basins. The only way to fully stop ANS from transferring from either basin during periods of adequate flow is permanent separation of the two basins.

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,

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