Thank you for your comment, Keith Creagh.

The comment tracking number that has been assigned to your comment is GLMRIS2AP50058.

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Great Lakes and Mississippi River Interbasin Study (GLMRIS)
Comment ID: GLMRIS2AP50058

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Attachment: GLMRI Letter.pdf

Comment Submitted:

Please see the attached GLMRI letter

STATE OF MICHIGAN
DEPARTMENT OF NATURAL RESOURCES
LANSING

RICK SNYDER
GOVERNOR

KEITH CREAGH
DIRECTOR

October 12, 2012

Mr. Jack Drolet
Great Lakes Mississippi River Interbasin Study Program Manager
Summary Report Comments
1776 Niagara Street
Buffalo, New York 14207-3199

Dear Mr. Drolet:

Thank you for the opportunity to comment on the Focus Area 2 Aquatic Pathways Assessment Summary Report. Our staff has been actively involved in reviewing several of the individual projects and by participating on the Executive Steering Committee for the Great Lakes Mississippi River Interbasin Study (GLMRIS). While comments were provided earlier during the development of several individual studies, this letter provides input on behalf of the Michigan Department of Natural Resources (MDNR) and the Michigan Department of Environmental Quality (MDEQ) for the State of Michigan.

While Michigan does not have an aquatic nuisance species (ANS) pathway connecting the Great Lakes and the Mississippi River Basin in its jurisdiction, we appreciate the opportunity to review and comment on the process, methodologies, and products produced by the aquatic pathways teams. Of particular, we note and appreciate the flexibility of the U.S. Army Corps of Engineers (ACOE) in allowing the teams to modify the ANS lists to accommodate local concerns regarding the transmission of viral hemorrhagic septicemia virus (VHSv). Our comments and questions follow:

- With respect to the pathway assessment process (Section 3.4), the use of the probability models to establish risk is an appropriate approach. The report lacks detail in determining who decided upon the relative risks for each category. Was there a formal structured judgment process or was a consensus model amongst the individual assessment teams used to make decisions?

- We agree with the conclusion in Section 4, "...the level of significance of the CAWS as a viable aquatic pathway as compared to the much lower significance at any of the 18 Focus Area 2 locations."

- The Eagle Marsh, Indiana pathway, appears to be especially troubling and the report characterizes the significant risk that this pathway poses. We encourage the ACOE to aggressively pursue follow-up actions in closing this pathway.

- For the Parker-Cobb Ditch, Indiana, the report mentions an open pathway several times a year, and on one hand, discounts the viability of transfer due to an underground culvert (with no distance mentioned) but then also recognizes the uncertainty associated with that habitat determination. Our experience is that poor water quality in ditches may be temporal in nature and may preclude permanent habitation of fish species, but the temporal aspect means that at times of the year, the water quality is perfectly adequate for fish passage from one waterbody to another. This is especially important because the only area rated "low probability" for Asian carp was for the transit pathway parameter, while three other

pathways were rated "high." We would encourage pursuit of separation of this pathway given this uncertainty.

- Little Killbuck Creek, Ohio, is presented as a "medium" risk rating. We are confused by the rationale of this rating when considering the following supporting paragraph:

  > Suitable habitat, and in some cases permanent habitat for a diversity of aquatic life, including the ANS of concern, is available at this location. Both the quality and the hydrology of the streams on either side of the interbasin divide allow for the potential support of ANS at the Little Killbuck Creek site and it is possible that multiple ANS could utilize this pathway transfer between the Mississippi River and Great Lakes Basins.

- We would encourage a second consideration of this site as a high probability location, or at least further justification for the "medium" ranking compared to other locations.

- The report encourages consideration of the aquatic pathway findings for inclusion in updates for Statewide Invasive Species Management Plans for each of the affected states. We find this to be a solid recommendation that provides assurances for these considerations from a regional Great Lakes perspective.

- The National Invasive Species Hotline (apparently at the University of Texas?) raises some concerns. A generic call center may not be the most effective system for reassuring the public. The hotline is presented under the "regulator or agency" category, but when queried, the call center operator does not give an agency affiliation for the hotline. Because it is listed first on the jurisdictional guide list, the federal agencies responsible for this may want to assure that the call center is actually providing the most informative services possible.

Again, thank you for the opportunity to comment on this report and for inviting our staff to serve on the Executive Steering Committee of GLMRIS. The program managers for Focus Area 2 were very accommodating and clearly dedicated to inclusion of our concerns.

If you require further information, please contact Ms. Sarah LeSage, MDEQ's Water Resources Division, at 517-241-7931 or lesages@michigan.gov; or Dr. Tammy Newcomb, MDNR's Fisheries Division, at 517-373-3960 or newcombt@michigan.gov.

Sincerely,

Keith Creagh
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517-373-2329

Dan Wyant
Director
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517-373-7917

cc: Mr. Jim Sygo, Deputy Director, MDEQ
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