

Thank you for your comment, Bob Wakeman.

The comment tracking number that has been assigned to your comment is GLMRIS2AP50072.

Comment Date: December 27, 2012 17:23:33PM
Great Lakes and Mississippi River Interbasin Study (GLMRIS)
Comment ID: GLMRIS2AP50072

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Attachment: GLMRIS Comment Letter Final Draft.doc

Comment Submitted:



March 30, 2011

Colonel Vincent V. Quarles
Commander, Chicago District
U.S. Army Corps of Engineers
111 N. Canal, Suite 600
Chicago IL 60606

Dear Colonel Quarles:

On behalf of the Wisconsin Department of Natural Resources (WDNR) please accept these comments on the GLRMIS as part of the NEPA scoping process.

Eight known or potential connections between the Great Lakes and Mississippi River basin have been identified in Wisconsin through the GLMRIS. The most significant connection is located in Portage, Wisconsin where in 2010 a hydrologic connection was documented during a record setting runoff event. This known connection and the other 7 potential connections represents a significant threat not only to the ecological, social and economic value of Wisconsin's 15,000 lakes, 84,000 miles of river and streams and 5.4 million acres of wetlands, but to the Great Lakes as well. An estimated 235,000 anglers fish 3.7 million days every year for fish in Wisconsin's waters of Lake Michigan and Lake Superior generating an economic impact of \$419 million in 2008.

Separation of the Mississippi and Great Lakes basins is critical and should be planned to be effective for 100% of species. Preventing **some** AIS from crossing between basins is not an acceptable solution. A complete hydrologic separation between basins will prevent natural migration of AIS. Complete separation combined with WDNR's strong prevention, containment and control strategy will provide for maximum protection of Wisconsin's water resources from inter-basin transfer.

WDNR does share the concerns expressed by numerous others that the timeline to complete the GLMRIS should be significantly shortened. In addition, we should not wait for the GLMRIS to tell us the Chicago Area Waterway System is an open pathway which already has a documented history of invasive species passage (both upstream and downstream). Steps need to be taken immediately to close this connection. The Great Lake states need to target sources of all kinds, and this source is the most threatening to our ability to prevent, contain and control AIS.

Wisconsin's comprehensive strategy for prevention, containment and control of AIS relies on strong partnerships with federal, state, and county governments as well as with hundreds of local lake and river organizations and thousands of citizen volunteers committed to protecting water resources from the harmful impact of AIS. In 2010, over 180,000 people were educated about the steps to take to prevent the spread of AIS and nearly 88,000 boats were inspected to make sure aquatic hitchhikers weren't onboard. Over 90% of boaters contacted were aware of the laws prohibiting the transport of AIS on boats and trailers. We are also investing over \$4 million in state funds annually in early detection and response, prevention and control of AIS. While we are making great progress, we realize much more needs to be done.

WDNR and our AIS Partnership support the work being completed by the US ACOE and appreciated the opportunity to contribute to the assessment and evaluation of the inter-basin connections. The US ACOE can continue to rely on WDNR cooperation during this process. The final report entitled Great Lakes and Mississippi River Interbasin Study – Other Pathways Preliminary Risk Characterization (Nov, 9, 2010) states that “A more detailed risk assessment, conducted in collaboration with the Wisconsin DNR, the USFWS and the USGS is recommended at each of the locations deemed to pose a Medium ANS Transfer Risk in Wisconsin...”. WDNR agrees with this recommendation and looks forward to working with our federal partners in conducting further work on these locations.

Funding of the GLMRIS and the implementation of the recommendations should not jeopardize funding to the Great Lake states for other prevention, containment and control activities. WDNR has created an effective strategy in Wisconsin with the financial assistance from our federal partners. Great Lake Restoration Initiative (GLRI) funding has helped create a culture of containment within the Lake Michigan and Superior basins. In addition, a similar funding initiative is needed in the Mississippi River basin which is experiencing migration of AIS up and down its length. Wisconsin has significant exposure to the Mississippi River and is in need of financial support to strengthen its partnerships on the “west coast”.

WDNR appreciates the opportunity to provide comments on the GLMRIS and look forward to continuing to provide US ACOE with assistance throughout this process.

Sincerely,

Russ Rasmussen
Acting Water Division, Administrator

Cc: Mike Staggs, WT/4
Steve Galarneau, OGL
Jeff Bode, WT/4
Phil Moy, ANS Task Force – Great Lakes Panel, Chair
Greg Conover, ANS Task Force – Mississippi River Basin Panel, Chair