

Thank you for your comment, John Stark.

The comment tracking number that has been assigned to your comment is GLMRIS2AP50082.

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Great Lakes and Mississippi River Interbasin Study (GLMRIS)
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Attachment: Eagle Marsh ANS comments.pdf

Comment Submitted:

January 14, 2103

U.S. Army Corps of Engineers, Louisville District
Attn: CERL-PM-P Eagle Marsh Comments
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Louisville, KY 40201-0059

The Nature Conservancy in Ohio appreciates the opportunity to comment on the GLMRIS Aquatic Nuisance Species (ANS) Control Report for the Wabash-Maumee Basin Connection in Fort Wayne, Indiana. The Nature Conservancy in Ohio is keenly interested in the connection at Eagle Marsh because of the probable and highly damaging ramifications of the spread of ANS from the Wabash sub-basin of the Mississippi River Basin into the Lake Erie Basin and likewise, the spread of the Great Lakes ANS into the Ohio River Basin and thus into the Mississippi River Basin as well. Should inter-basin transfer occur at Eagle Marsh, the aquatic resources of the entire state of Ohio are potentially at risk as all of our waters are in either the Ohio River or Lake Erie Basins.

Our comments reflect not only the information developed by the Corps of Engineers in the original risk assessment of various ANS organisms at Eagle Marsh developed in 2011 (Appendix A of the current report) but also more recent telemetry and sampling information from ongoing Purdue University monitoring in the Wabash River System. A presentation of Purdue's monitoring at the 2012 American Fisheries Meeting in St. Paul, Minnesota revealed that Asian carp are spawning near Huntington in the Wabash River. This sample site is only a few miles from confluence of the Little River that flow out of the Eagle Marsh area

The current ANS control report somewhat discounts the probability that Asian Carp could spawn in the Little River because only one telemetered fish in the Purdue study has been documented to have entered the Little River from the Wabash. However the Purdue researchers noted in their presentation that the telemetry receiver located in Little River had failed not long after the telemetry study began and would need to be replaced in 2013 in order to gather information about the use of Little River by Asian Carp. Additionally, the Purdue research has revealed that adult silver carp at least were capable of traveling hundreds of miles upstream in a month. The current report also notes that USFWS and USGS representatives have found that juvenile Asian Carp make sudden unexplained and aggressive migrations and on occasion Asian carp use habitat not thought generally to be suitable for these fish. The long and short of this new information is that juvenile Asian Carp might be able to approach the temporary barrier. If this occurs there is a strong likelihood that they would be able to pass through the temporary barrier's chain link fencing during flood conditions.

The current report also documents the relatively high probability that other ANS organisms such as parasitic copepods, and the disease VHS might transfer through Eagle Marsh from Lake Erie. Therefore, the Nature Conservancy in Ohio believes that the risk of transfer at Eagle Marsh is of even greater probability and more immediate nature than the current report states. As a result, any barrier or combinations of controls must be predicated on more regular access of known and future ANS to and

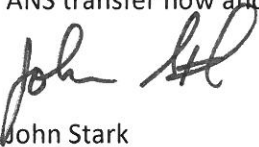
through the transit point than the original risk assessment would indicate and should result in reliable hydrologic disconnection of the Wabash and Maumee basins.

Structural Alternatives A, H, & I in the current report all provide complete effectiveness against ANS transfer protection up to a flood magnitude event of less than 1% probability. Within these designs based on the current assessment, H & I cost far less to construct and impact fewer property parcels than alternative A. Alternatives H is the least expensive (\$5.7 million) of the two alternatives to build, impacts fewer parcels and is less expensive to maintain than I, although alternative I would allow for a larger wetland complex that would render better water quality and groundwater recharge. Alternatives H & I also both received high acceptability ratings based largely on likely local stakeholder response.

Therefore the Nature Conservancy in Ohio strongly supports the implementation of either Alternative H or I. We also recognize that either alternative would create localized, currently impermissible flood level increases according to Indiana floodplain regulations. However given that the actual area in which the impermissible elevation rise is far less than the area influenced by the recommended alternatives and that vast human and associated economic impacts in the Mississippi and Great Lakes Basins in the US and Canada could be averted by effective ANS controls from this project, it is recommended that changes to the current Indiana floodplain regulations be sought that would allow either Alternative H or I to be implemented.

If construction of a permanent structural barrier cannot be accomplished before the temporary WRP authorization of the temporary barrier will expire in 2014, an extension should be sought. This barrier while not effective on many ANS organisms is at least effective in controlling adult movement of Asian Carp through the Eagle Marsh Area.

The current report did not focus strongly on nonstructural controls such as selective toxins, harvest, etc. However, given the potential with changing climate that floods sufficient to exceed the 1% probability event could occur more frequently than currently predicted, multiple layers of available non-structural controls and sites for implementation should be selected within 6 months by a stakeholder group and implemented on both sides of the basin divide within a year to reduce the possibility of ANS approaching and passing either the temporary barrier already in place or any permanent structural control that is ultimately selected and implemented. Such an approach would vastly lessen the risks of ANS transfer now and in the future.



John Stark
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