

# GLMRIS

GREAT LAKES AND MISSISSIPPI RIVER INTERBASIN STUDY

## GLMRIS NEPA Scoping Document Submittal Form

Complete this form, and attach it to your document. Turn this form in with your document when you go to speak or at the welcome desk.

**SUBMITTING PERSONAL INFORMATION:** You must submit your first name, last name and zip code for your comment to be considered. Any other information is optional.

**WITHHOLDING OF PERSONAL INFORMATION:** Before including your address, phone number, e-mail address or other personal information with your comment, you should be aware that your entire submittal, including your personal information, will be posted on the GLMRIS Web site and included in the National Environmental Policy Act (NEPA) documents.

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Please note, all submissions from organizations or businesses, and from individuals identifying themselves as representatives or officials of organizations or businesses, will be available for public inspection in their entirety.

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First Name(required): Cheryl Last Name(required): Mendoza

Organization/Tribe (Official Representatives only): \_\_\_\_\_

Street Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code (required): 49450

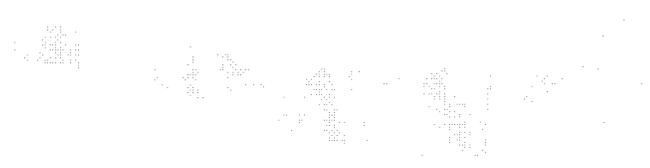
Public Scoping Meeting Location: \_\_\_\_\_

Date of Comment: \_\_\_\_\_

Comment Number: \_\_\_\_\_



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**GLMRIS Scoping Public Hearing Comments**  
**Cheryl Mendoza, Freshwater Future Associate Director**  
**Traverse City, Michigan**  
**January 27, 2011**

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Thank you for the opportunity to provide comments today. Freshwater Future is the only watershed-wide organization dedicated solely to supporting the needs of community-based groups and advocates working to protect and restore Great Lakes land and water resources. We have provided over \$1 million in grants, locally targeted resources, and one-on-one technical help that has supported over 700 on-the-ground projects to restore and protect Great Lakes waters. On an annual basis, Freshwater Future gives 40-50 small grants to community-based groups and maintains a network of 2,000 community groups and individuals working to protect our Lakes.

I am here today to emphasize the urgency of keeping the Asian carp and other invasive species from the Mississippi River system out of the Great Lakes and how GLMRIS must be narrowed and focused to be a meaningful tool on the path to safeguarding the Great Lakes.

As you know, testing has found genetic material from Asian carp above the electric dispersal barrier in the Chicago Sanitary and Shipping Canal. And the discovery of spawning Asian carp in the Wabash River shows the crisis is advancing on multiple fronts and requires aggressive and immediate action to deal with the crisis. If invasive giant Asian carp make it into Lake Michigan, these fish with voracious appetites could wreak havoc on the entire Great Lakes 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.

## Focus of GLMRIS

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.**”

On page 2, the GLMRIS Project Management Plan identifies the added objective of “reduction of the risk”. It is important to note Congress did not authorize “risk reduction.” It is also not a credible strategy to achieve prevention. Research here would divert resources from quickly determining how to achieve prevention and taking needed actions.

It has been discussed that you must study risk reduction in the case that prevention is not possible. I disagree. For example, when Congress passed and President Nixon signed into law the Endangered Species Act the intent was, and is to this day, for Federal entities to “conserve endangered and threatened species.” It was not to “try” to conserve. While we may not always be successful in preventing species from becoming extinct, it is what we strive for.

In the same way, while it is unknown if full prevention is possible, we must strive for it stop to invasive species from entering the Great Lakes from the Mississippi River system to protect our world-class resources and our Great Lakes way of life.

We realize the most effective solutions will likely also be the most costly and full protection of our Great Lakes from this threat will largely be a Congressional budgetary decision. However, I want to stress that that is a decision for Congress to make, not the ACE. By adding additional study objectives not authorized by Congress that step away from prevention – or in other words, studying how to slow down the eventual instead of stopping the threat – it appears the you are making the decision that prevention will not be possible before we have fully tried. Our best chance to protect the Great Lakes is for GLMRIS to focus in on what Congress authorized – prevention – and to let Congress decide if the option is feasible.

## Timeline and Resources

As you are listening to my comments today, the Asian carp are swimming near our Great Lakes.

We are very alarmed that the Chicago portion of the study is not expected to be completed until mid-2015, nearly five years from now. We ask you to acknowledge the urgency of finding a permanent solution, condense the timeline and produce final results for the Chicago portion of GLMRIS within 18 months.

Because this is such an urgent matter that threatens the ecosystem of the largest fresh surface water system on the planet, many others have been, and are, stepping up to help. We encourage you to investigate these resources and utilize them to the fullest to lessen your workload and shorten your timeframe to one that is more likely to protect our Great Lakes. Such resources would assist, if not fulfill, many of your research needs in the areas of risk assessment, wastewater and transportation, and economic analysis. They include:

- **Risk Assessment:** at least two comprehensive reports describing the likely impacts of Asian carp on the Great Lakes have already been written, one from the U.S. Fish and Wildlife Service and one from Fisheries and Oceans Canada: ([www.fws.gov/contaminants/OtherDocuments/ACBSRAFinalReport2005.pdf](http://www.fws.gov/contaminants/OtherDocuments/ACBSRAFinalReport2005.pdf), [www.dfo-mpo.gc.ca/csas/Csas/DocREC/2004/RES2004\\_103\\_E.pdf](http://www.dfo-mpo.gc.ca/csas/Csas/DocREC/2004/RES2004_103_E.pdf)). In addition, Fisheries and Oceans Canada recently commenced a bi-national effort to create an updated risk assessment for Asian carp. There is abundant literature describing the potential movement of other invasive species via the Chicago Waterway System (CWS) and the impacts of the movement of zebra mussels into the Mississippi River basin via the Chicago Waterway System are well-documented. There is absolutely no justification for the Corps to place higher priority on conducting its own risk assessment than on preventing the spread of Asian Carp through the CWS.
- **Wastewater and Transportation:** The Great Lakes Commission and Great Lakes-St. Lawrence Cities Initiative (GLC/GLSLCI) are conducting a study on the water management and transportation alternatives available after a physical separation of the Great Lakes and Mississippi River. Other organizations, such as the Alliance for the Great Lakes and the Natural Resources Defense Council, have also described alternatives for achieving prevention through a physical separation. The Corps should incorporate the findings of these projects to hasten its own analysis.
- **Economic analysis:** Likewise, the GLC/GLSLCI includes an economic impact analysis, will be conducted by an elite-tier private engineering and

transportation team and should be completed by January 2012. The Corps should engage themselves in and use this economic analysis for identifying the best way to achieve physical separation on the Chicago Waterway System rather than writing its own.

### **Public Support**

Not only do you have research available from the entities mentioned above, you have tremendous public support to quickly find a permanent solution and protect our Great Lakes. For example, in less than 90 days this past summer Freshwater Future in partnership with seven other organizations collected nearly 12,000 post cards from our memberships alone, calling on President Obama to “immediately and swiftly work toward separating the Great Lakes from the Mississippi River system.” From this effort, we also had folks like Capt. Dan Tebo who operates D'Ann Marie Charters in Grand Haven, Michigan develop his own post cards based off our language and mailed them to us to be delivered to the White House with ours. Other similar spontaneous engagement came from folks like Sister Joellen Sbrissa from the Congregation of St. Joseph, Carrie Paxton from Onekama Marine, and many more. People across the region want a permanent solution and recognize the urgency of stopping the Asian carp and other invasive species.

Thank you for your time today.