Thank you for your comment, Marc Smith.

The comment tracking number that has been assigned to your comment is GLMRIS2AP50081.

Comment Date: January 14, 2013 11:29:06AM
Great Lakes and Mississippi River Interbasin Study (GLMRIS)
Comment ID: GLMRIS2AP50081

First Name: Marc
Middle Initial: E
Last Name: Smith
Organization: National Wildlife Federation
Address:
Address 2:
Address 3:
City:
State:
Zip: 48104
Country:
Privacy Preference: Don't withhold name or address from public record
Attachment: GLMRIS Comments - Eagle Marsh 1-2013.pdf

Comment Submitted:

January, 14 2013

Nathan Moulder
U.S. Army Corps of Engineers, Louisville District
ATTN: CELRL-PM-P Eagle Marsh Public Comments
P.O. Box 59
Louisville, KY 40201-0059

Re: Comments regarding the Aquatic Nuisance Species Controls Report – Wabash-Maumee Basin Connection at Fort Wayne, Indiana

Dear Mr. Moulder,

Please accept these comments submitted on behalf of the undersigned coalition of conservation organizations 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) Aquatic Nuisance Species Controls Report – Wabash-Maumee Basin Connection at Fort Wayne, Indiana (Report).

The undersigned organizations appreciate the opportunity to comment, and provide several recommendations below to improve the Report. At the outset, we would like to reemphasize that the overarching goal for the Great Lakes and Mississippi River Interbasin Study (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.

Our organizations have concerns with how the Corps characterizes GLMRIS as an "ecosystem restoration feasibility study." (page 34 of the Report). These types of studies, according to the Corps, are carried out by using four screening criteria – effectiveness, efficiency, acceptability, and completeness – to "conduct a trade-off analysis of the relative costs and benefits of each of

the alternative plans that will support a recommendation of a single plan that best contributes to National Ecosystem Restoration."

GLMRIS is not an ecosystem restoration project, but a Congressional charge to study ways to prevent transfer of ANS via aquatic pathways. The goal of prevention, unlike ecosystem restoration with its focus on incremental improvements in ecosystem resources, see the Corps' Planning Guidance Notebook at 2-1 to 2-2, sets a bright line of no transfer. Thus, the cost-benefit trade-off analysis that the Corps' describes is questionably appropriate for this study. In other words, the Corps is not engaged in merely a risk-reduction exercise, but must aim at a zero-transfer goal.

Specific to the pathway at Eagle Marsh, Indiana, our organizations recommend alternatives H and I. Both of these alternatives would provide a hydrological separation of the Great Lakes and Mississippi River basins and are economically feasible. We do recognize the issue of local impacts if an earthen berm were constructed through the Eagle Marsh. Therefore, a final alternative must address the issue of additional flooding and must develop a flood mitigation plan that is environmentally sound, economically feasible, and is acceptable to local stakeholders.

Invasive Species threat to the Great Lakes and Mississippi River

The Great Lakes contain 20 percent of all surface freshwater on the planet and comprise the world's largest freshwater ecosystem. Unfortunately, the lakes are under siege from over 180 non-indigenous species — nonnative fish, mollusks, crustaceans and plants that entered via artificial canals, ocean freighters, release from aquaria, or other intentional or unintentional releases. Asian carp are the latest threat and could be the worst invaders yet if the species establish breeding populations in the lakes.

The Mississippi River basin is already besieged by Asian carp and other invasive species. States in the basin have incurred great costs from the zebra mussel invasion in the past and are dealing with Asian carp infestations now, at a time when the round goby and quagga mussels are moving south through the Chicago connections with the Great Lakes.

Two species of Asian carp -- Bighead and Silver Carp -- are voracious filter feeders, fast-growing, and highly productive. They consume massive amounts of plankton, a food source that is crucial for a number of native species, and therefore have the potential to radically change the way ecosystems work. In parts of the Mississippi and Illinois Rivers, these invasive carp represent up to 95% of the biomass. With questions about the ability of other species in the Great Lakes to control their populations, they could never be fully removed from the ecosystem if they became established. Bighead carp can reach up to 100 pounds and consume between 5% and 15% of their body weight per day. Silver carp can reach 20 lbs, and their tendency to leap

out of the water when startled makes them a hazard to boaters. If Asian carp establish themselves in the sensitive tributaries and water bodies that serve as the breeding grounds for the Great Lakes fishery, the annual $7 billion dollar Great Lakes recreational and commercial fishery and the lakes $16 billion boating industry will be at severe risk.

Outside of the Chicago Waterway System, the pathway at Eagle Marsh, Indiana (a 716-acre wetland restoration site) poses the highest risk of carp introduction to the Great Lakes via a connection during flooding between the Wabash River in Indiana (which is already carp-infested from the Ohio River) and the headwaters of the Maumee River in Ohio (which connects to Lake Erie and is presumed to be free of reproducing Asian-carp at this time, though several individual fish have been caught over the past 15 years). We applaud the actions of the Indiana Department of Natural Resources in constructing a temporary barrier between the Wabash and Maumee Rivers. However, we realize that this is only a temporary barrier and a permanent solution is critically needed.

Local Impacts

Alternatives A, H, and I will prevent the transfer of aquatic nuisance species between both the Great Lakes and the Mississippi River basins. Our organizations strongly support Alternatives H and I because either of these alternatives will enhance and strengthen an existing structure already present in the area of concern, thus reducing the ecological impacts to Eagle Marsh. Alternatives H and I would remove the decaying and unsustainable berm that is covered with invasive plant species and replace it with a stronger and more effective barrier that would withstand flooding events. Moreover, this new barrier berm would allow for native plants to be established, which also will benefit wildlife and reduce erosion.

While Alternative A would prevent the transfer of aquatic nuisance species, we are concerned that this alternative would have negative impacts to Eagle Marsh. Specifically, Alternative A would:

- Require building a new wall structure directly through the heart of Eagle Marsh that would create a barrier for the migration of mammals, reptiles and amphibians, some of which are listed as endangered or species of special concern in Indiana;

- Cause negative impacts to the thriving restored prairie habitat in which monarchs have been reported by the hundreds, roosting in the neighboring trees during the fall migration;

- Negatively impact areas in close proximity (meters) to where Blanding's turtles have been recorded;

- Negatively impact sensitive vernal pools that are critical breeding sites for salamanders, frogs, and toads; and

- Remove the use of Trail 8 at Eagle Marsh, the most used trail for Little River Wetlands Project's (LRWP) free nature education programs. LRWP served 6000+ attendees during 2012.

Furthermore, we are concerned about the risk of increased flooding with each alternative. Our organizations support alternative H and I in connection with an environmentally sound and local stakeholder-supported flood mitigation plan.

Conclusion

In summary, our organizations: a) strongly encourage the Corps to adhere to the Congressional authority to "prevent" the spread of aquatic nuisance species between the Great Lakes and Mississippi River basins and not simply "reduce the risk"; b) have concerns regarding how the Corps is defining GLMRIS as an 'ecosystem restoration project' vs. the Corps Congressional authorization to prevent transfer of ANS via aquatic pathways; c) recommend alternatives H and I for purposes of invasive species prevention and control; and d) support a final alternative built on either alternative H or I that includes an environmentally sound and local stakeholder-supported flood mitigation plan.

Thank you for the opportunity to comment, and for seriously engaging in this study, which is critical to the health of the Great Lakes and Mississippi River basins. If you have any questions please do not hesitate to contact Marc Smith with National Wildlife Federation at 734-887-7116 or msmith@nwf.org.

Sincerely,

Marc Smith
Senior Policy Manager
National Wildlife Federation

Barbara Simpson
Executive Director
Indiana Wildlife Federation

Kristy Meyer
Director, Ag, Health & Clean Water Programs
Ohio Environmental Council

Jared Teutsch
Water Policy Advocate
Alliance for the Great Lakes

Jeff Forester
Executive Director
Minnesota Lakes & Rivers Advocates

Glynnis Collins
Executive Director
Prairie Rivers Network

James Clift
Policy Director
Michigan Environmental Council

George Meyer
Executive Director
Wisconsin Wildlife Federation

Gary Botzek
Executive Director
Minnesota Conservation Federation

Cheryl Nenn
Riverkeeper
Milwaukee Riverkeeper

Scott Popplewell
President
Central Ohio Anglers and Hunters Club

Dave Zieverink
Ohio Division President
Izaak Walton League of America

Sandy Bihn
Executive Director
Lake Erie Waterkeeper

Rebecca A. Humphries
Director
Ducks Unlimited Great Lakes/Atlantic Region

Jennifer Nalbone
Director, Navigation and Invasive Species
Great Lakes United

Jim Sweeney
President, Porter County Indiana Chapter
Izaak Walton League of America

Elaine Marsh
Conservation Director
Friends of the Crooked River

Captain Rick Unger
President
Lake Erie Charter Boat Captains

Nicole Barker
Executive Director
Save the Dunes

Matt Misicka
Chair, Ohio Advisory Committee
Bull Moose Sportsmen's Alliance

Jill Crafton
Chair, Great Lakes Committee
Izaak Walton League of America

Larry Dolphin
Minnesota Division President
Izaak Walton League of America

Barry Chouinard
FM Walleyes Unlimited, Inc.