



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Bishop Henry Whipple Federal Building
1 Federal Drive
Fort Snelling, MN 55111-4056

IN REPLY REFER TO:
FWS/AES-CPA (ER 10-1040)

FEB 28 2011

Mr. David Wethington
GLMRIS/CAWS Project Manager
U.S. Army Corps of Engineers
Chicago District
111 North Canal Street
Suite 600
Chicago, Illinois 60606-7206

Dear Mr. Wethington:

This letter is in response to the November 16, 2010, *Federal Register* Notice of Intent (NOI) to prepare a Draft Environmental Impact Statement (DEIS) for a U.S. Army Corps of Engineers (Corps) Great Lakes and Mississippi Interbasin Study (GLMRIS). The U.S. Department of Interior (Department) has requested that interested bureaus review the NOI and submit any comments directly to the Chicago District of the Corps. The U.S. Fish and Wildlife Service (Service) offers the following comments and recommendations for your consideration.

General Comments

Identifying and evaluating the effects on the human environment of various control mechanisms to prevent the transfer of aquatic invasive species (AIS) between the Great Lakes and Mississippi River watersheds is extremely important and should continue to be a high priority for the Corps. Based on information obtained from the GLMRIS website, the Chicago Area Waterway System (CAWS) is considered the location with the highest risk for AIS transfer. As such, the Service suggests that the Corps make every effort possible to expedite the GLMRIS study and implement actions in the interim that will minimize the risk of interbasin exchange of AIS. While there is much emphasis on preventing AIS, specifically Asian Carp, from moving out of the Mississippi River Basin and into the Great Lakes Basin, the Service understands a major focus of this study will also address preventing AIS movements in the other direction, which is from the Great Lakes Basin into the Mississippi River Basin.

While the NOI did not provide sufficient details regarding potential alternatives for the Service to comment on, the information about the focus areas and process was beneficial. Accordingly, the Service's comments are very general at this time. The Service and Department will provide more detailed input as project planning progresses.

The NOI indicates the DEIS will address two areas: 1) the CAWS; and 2) other aquatic pathways between these basins. However, page/slide 18 used at public scoping meetings ([GLMRIS NEPA Scoping Meeting Presentation](#)) indicates the record of decision will be restricted to the CAWS. The Project Management Plan (PMP) on the other hand suggests a scope similar to the NOI. The Service requests that the Corps clarify the intent of this NOI.

The Service has a substantial interest in activities that have the potential to affect fish and wildlife resources in both basins, and we are very involved in efforts to prevent the spread of AIS. We recommend that the Corps carefully consider measures that will inhibit the spread of AIS, increase fish and wildlife habitat value, and attenuate increasing variability in the hydrographs of involved waterways. We recommend that those measures contribute to the habitat value of fish and wildlife to the maximum extent possible. Full analysis of such alternatives may be addressed through the Fish and Wildlife Coordination Act (FWCA) process, utilizing transfer funding. We, therefore, would like to meet with the Corps about our involvement under the FWCA so issues can be addressed early in the planning process.

Fish and Wildlife Resources

The Service has substantial and significant trust fish and wildlife resources in the detailed study area. These include National Wildlife Refuges, migratory birds, federally threatened and endangered species, interjurisdictional fishes and land interests involving Federal Aid for Fish and Wildlife Restoration. Many of these trust interests are co-managed or involve partnerships with the states. It is important that the DEIS identify the positive and negative impacts to these resources for all alternatives.

The Service recommends that the Chicago District include the following information in the DEIS. This information will assist reviewing agencies in assessing potential impacts and in evaluating the proposed project and alternatives. Therefore, as this study progresses and as alternatives and control mechanisms become identified, it is imperative that the appropriate field offices within Regions 3, 4, 5 and 6 (Fisheries and Ecological Services) become involved early in the process. The Service is willing to provide assistance and expertise to obtain this information.

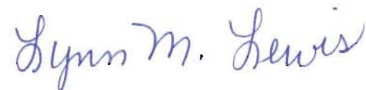
1. Identify fish and wildlife species and their habitats located in the detailed study area that could be affected by the project. This should include federally, threatened and endangered species, migratory birds, and interjurisdictional fish species. Determine the potential direct and indirect impacts on these resources and the measures that could be implemented to avoid and minimize impacts. Also, identify means of compensating for unavoidable impacts and consider including fish and wildlife enhancement measures as project features.
2. Assess the presence and distribution of wetlands and riparian areas in the detailed study area. Determine the potential direct and indirect impacts of project implementation on these areas.

3. Review fish passage opportunities associated with sites studied in this effort, both for habitat value and AIS challenges presented.

4. Disclose the specific locations of alternatives being considered in order to determine if property with a Service interest (fee title, easement or Wildlife and Sport Fish Restoration funds) will be affected.

The Service appreciates the opportunity to provide comments and is looking forward to working with the Corps to expedite the completion of this important effort while ensuring that potential project impacts to trust resources and other fish and wildlife resources are adequately addressed. For continued coordination and expedited technical assistance regarding fisheries or AIS related issues, please contact Mr. Nate Caswell (Nate_Caswell@fws.gov) at 618-997-6869. For endangered species or conservation planning related issues please contact Ms. Louise Clemency (Louise_Clemency@fws.gov) at 847-381-2253.

Sincerely,



Lynn M. Lewis
Assistant Regional Director

cc: DOI-Office of Environmental Policy & Compliance (L. Sutton)
USFWS-East Lansing Field Office
USFWS-Twin Cities Field Office
USFWS-Columbus Field Office
USFWS-Chicago Field Office
USFWS-Green Bay Field Office
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