

Thank you for your comment, Denny Caneff.

The comment tracking number that has been assigned to your comment is GLMRIS50196.

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GLMRIS

Comment ID: GLMRIS50196

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Attachment: GLMRIS testimony.riveralliance.jan 11.pdf

Comment Submitted:



**RIVER ALLIANCE**  
*of Wisconsin*

January 25, 2011

**Comments from River Alliance of Wisconsin Regarding U.S. Army Corps of Engineers Great Lakes and Mississippi River Interbasin Study (GLMRIS)**

The River Alliance of Wisconsin is a nonprofit river conservation organization. We have over 3,000 individual, organizational and business members whose interest is the protection and restoration of Wisconsin's flowing waters. That interest includes stopping the introduction and invasion of exotic and damaging plants and animals to the state's rivers. In fact, River Alliance operates the most extensive riverine invasive species awareness project in Wisconsin.

Our interest in this Interbasin Study stems from the concern we have that Asian carp have just a small leap to make from the Illinois River to Lake Michigan via the Chicago sanitary and navigational canal system, and on up the Lake Michigan shore to many fine Wisconsin rivers.

We have visited the electronic fish barrier at Lockport, and while we were impressed with the state of the technology and its management, we were left with the distinct impression that it is not infallible, and that the arrival of Asian carp into the Great Lakes system could be a matter of not IF, but WHEN.

*We Save Rivers*

We are pleased the Corps of Engineers is undertaking this study. We have several suggestions for making it more useful for the general public, who in the end will be the ultimate beneficiaries of no Asian carp in the Great Lakes.

We understand the mandate of this study is to “prevent the transfer of aquatic nuisance species between the Great Lakes and the Mississippi River and, according to the Corps’ two-page brochure on the project, “is not solely focused on the Chicago Area Waterway System or the Asian Carp.

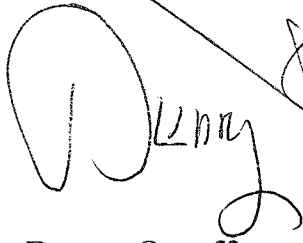
We believe this is a mistake. While there are no doubt other possible aquatic nuisances that could jump the divide. But considering all possible invasives in this study is as if the Corps is a fire department being asked to study why houses are burning down as a clear result of faulty wood stoves, then saying they will study the cause of all house fires.

It seems possible that the Corps could still examine other invasives and the possible means of their jumping from one basin to another, but emphasize – both in attention and in speed – the threat of Mississippi basin Asian carp to the Great Lakes. The locus of that threat is Chicago canal system – this should not be glossed over or denied.

Given the imminent and severe threat that Asian carp pose to the Great Lakes ecosystem, and the public attention and concern associated with it, priority for the study must be given to that front-and-center aquatic nuisance. We highly recommend that the USCOE “front-load” the five-year study with a sharp and intense focus on how the Asian carp can be kept out of Lake Michigan via the Chicago Area Waterway System. This is the most urgent challenge and the one that has the strongest public interest and concern. Given the uncertainties with congressional funding for this study, it is especially important to front-load the study in the way we suggest, and complete that element of the study by mid-2012. Other aspects of aquatic nuisances

passing between the Great Lakes and the Mississippi basin can still be studied, but given lower priority and finished by the projected 2015 completion date.

Finally, we recommend as part of the study an economic analysis of the cost of controlling, mitigating and eliminating the most serious nuisance plants and animals that have invaded the Great Lakes since early in the 20<sup>th</sup> century. The round goby, sea lamprey, zebra mussel and quagga mussel are the most serious that come to mind. Analyzing the economic damage these creatures have caused would give some perspective to the projected costs of keeping Asian carp out of the Great Lakes. It's often said that cutting off the connection between the Illinois River and Lake Michigan at Chicago would have had economic consequences for Chicago-area commerce. But showing the cost of even one pernicious invasive like the zebra mussel might give the public a sense of the pound of cure one invasive has cost us, versus how many ounces of prevention that cutting off the Lake Michigan-Illinois River connection might cost.

A handwritten signature in black ink, appearing to read "Denny Caneff", with a large, stylized initial "D" and a long, sweeping underline.

Denny Caneff

Executive Director