

Thank you for your comment, George Jackson.

The comment tracking number that has been assigned to your comment is GLMRIS50250.

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GLMRIS

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Comment Submitted:

Regarding studying the best way to keep Asian Carp from migrating through the Chicago Waterways into Lake Michigan.

I would like to see the scope of the study include an analysis of all costs of severing the Chicago waterway as opposed to using passive systems such as electric barriers and weigh those costs against their effectiveness and the most likely threat of Asian Carp to the Great Lakes.

The costs I would like studied are:

First, how severing the Chicago Waterway would effect some 8,000 recreational boaters and fishermen who depend on the Waterways for access between Lake Michigan, the Chicago River, the Chicago canals, and the Illinois River and what would be the cost to build, maintain, and operate new infrastructures to maintain free passage for recreational boaters.

The plans I have seen to sever the Canals at Bubbly Creek and near the O'Brian Dam would still leave three major municipal day use access points for recreational boaters at the towns of Summit, Alsip, and Worth isolated from Lake Michigan. Those plans would also prevent passage between the Illinois River and the Chicago Harbors. The costs to businesses and facilities serving those boaters should also be considered.

Second, how would severing the canals affect business throughout the Midwest who depend on raw materials and products shipped through Chicago's Waterways. I am talking about not only the business that use the raw materials but also the business that used the products made from those raw materials. One example would be the steel mills that use raw materials shipped through the waterways and the automotive companies throughout the Midwest that use that steel. In other words, what the perpetual costs would be in lost competitiveness and jobs if that supply chain were interrupted or replaced by a less efficient supply chain.

Third, the costs of creating a new infrastructure to replace the waterway routs if they were severed. That would include land, environmental studies, permits, and new construction, as well as the perpetual environmental costs and costs of maintaining and operating all new infrastructures.

An honest evaluation of the effectiveness of severing the canals verses passive methods must also be studied. We already know that hydrological separation is not 100% effective as a means of stopping Asian Carp and other invasive species and may not be any more effective than passive barriers. That issue must be addressed as well. For instance, Asian Carp are found in Lakes not connected to Illinois' rivers and Zebra Mussels have made their way over the Rocky Mountains, proving hydrological separation is not the bullet proof solution its proponents claim it to be.

Finally, an honest scientific assessment must be made as to the true threat of Asian Carp to the Great Lakes. The notion that Asian Carp will destroy the Great Lakes fisheries is largely contested by scientific studies and marine biologists throughout the Great Lakes region. For instance a study commissioned by NOAA under the Sea Grant program and published in 2008 concluded Asian Carp could not survive in the open waters of the Great Lakes. There is also unanimous agreement among marine biologists that the Carp cannot reproduce in the Great Lakes.

In addition I've heard claims that the value of the Great Lakes fishery is anywhere from \$7 billion to \$16 billion dollars annually.

I've studied those numbers and discovered that they are highly inflated. The true economic value of the Great Lakes fishery is likely less than \$2 billion today. Similarly, I have heard claims that if Asian Carp get into the Great Lakes 800,000 jobs could be lost. Ridiculous - a recent Michigan Sea Grant study has shown that jobs depending on fishing in the Great Lakes is more like 1-2% of that number. This study needs to bring to light the true economic impact and put these overinflated numbers to rest.

The scope of this study must consider all the costs of different solutions, the true effectiveness of hydrological separation verses passive methods, and the probability of any significant threat to the Great Lakes and the true costs associated with that threat.

Only then can we take all these variables into consideration to recommend a "best" solution to prevent Asian Carp and other invasive species from migrating between the Great Lakes and Mississippi basins.