

Thank you for your comment, Robert Stegmier.

The comment tracking number that has been assigned to your comment is GLMRIS50426.

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GLMRIS

Comment ID: GLMRIS50426

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Privacy Preference: Don't withhold my personal information from the website and NEPA documents

Attachment:

Comment Submitted:

Mr. David Wethington

U.S. Army Corps of Engineers

111 North Canal Street, 6th Floor

Chicago, IL 60606

david.m.wethington@usace.army.mil

Re: Notice of Intent to Prepare a Draft Environmental Impact Statement (EIS), Initiate the Public Scoping Period and Host Public Scoping Meetings for the Great Lakes and Mississippi River Interbasin Study (GLMRIS)

Dear Mr. Wethington,

Please accept these comments submitted regarding the U.S. Army Corps of Engineers (USCOE), Chicago District's Notice of Intent to Prepare a Draft Environmental Impact Statement (EIS), Initiate the Public Scoping Period and Host Public Scoping Meetings for the Great Lakes and Mississippi River Interbasin Study (GLMRIS).

I am extremely concerned about an Asian carp invasion to the international waters of the Great Lakes and St. Lawrence River, as well as concerned about the two-way transfer of aquatic nuisance species between the Mississippi and Great Lakes basins. I am submitting specific recommendations to improve GLMRIS and ensure the ecologic and economic health of these great basins is protected from the damaging transfer of Aquatic Nuisance Species (ANS)

I understand that the GLMRIS study was authorized by the U.S. Congress to "prevent" rather than "reduce the risk" of ANS movement between the Great Lakes and Mississippi River basin. In other words, Congress requires the Corps to only be developing solutions that are 100% effective. Therefore it is beyond the Corps' statutory authorization for the GLMRIS study to look at any solutions that would not achieve prevention.

I believe as do many thousands of people living in the Great Lakes region, both US and Canadian, that the only permanent solution to the Asian carp and ANS is the hydrologic separation of the Great Lakes from the Mississippi River basin.

It seems to me that USCOE has inappropriately and unwisely broadened GLMRIS to study "risk reduction" which is not what Congress told them to do nor a credible strategy to prevent ANS movement between Chicago Area Waterway System (CAWS) or any of the other aquatic connections. I applaud all of the short-term, emergency activities that have already been authorized around the CAWS and in Eagle Marsh, Indiana and other places. I wholeheartedly support these emergency activities and future such actions as they are determined necessary. Such action must continue until complete separation is accomplished.

Producing results before and initiating separation before the current target of 2015 is certainly possible by focusing on hydrological separation. The USCOE must realize the urgency needed and realign their plans and action to a much earlier date, possibly as early as late 2012 or early 2013

Prioritize Solutions for the Chicago Area; The obvious and critical threat of Asian carp establishing in the Great Lakes is a reason for urgent action. The Corps should study and provide a solution for the CAWS as the first priority, and where needed, act on other aquatic pathways, based on the greatest likelihood of invasion. If necessary, the Corps should consider a phased approach to

separating the two watersheds, prioritizing measures to prevent Asian carp migration while still taking steps that will lead to permanent prevention of all movement of aquatic nuisance species in both directions.

Integrate Relevant Research into GLMRIS; In order to accelerate the time frame of the study and save resources, the Corps should not duplicate relevant work that has already been done or is currently being performed. The Corps should integrate the scientific results from the binational risk assessment of Asian carp being facilitated by the Great Lakes Fishery Commission, and the identification of hydrological separation options being developed by the Great Lakes Commission and the Great Lakes-St. Lawrence Cities Initiative into GLMRIS, after an independent critical review.

Provide for Public Review and Input

The Corps should create an opportunity for regular discussion forums during which the public can interact with technical staff and consultants for detailed questions and answers on the progress of GLMRIS.

Request Hearing in Canada

An Asian carp invasion to the Great Lakes is not just a threat to Americans; it presents a serious threat to the health and welfare of Canadians. A risk assessment study conducted by the Canadian Department of Fisheries and Oceans concluded that if Asian carp successfully colonize the Great Lakes there is a high probability they would spread across the Great Lakes basin and possibly even through the prairie provinces. The study stresses that such an invasion would have a significant impact on the food web and trophic structure of aquatic systems. Furthermore, the Ontario government has stated that if Asian carp enters the Great Lakes there will be serious adverse impacts on Ontario's recreational and commercial fisheries, which are valued at approximately CAD\$400 million per year. Environment Canada has made a similar assessment.

I strongly ask the USCOE to adhere to the Congressional authority to "prevent" the spread of aquatic nuisance species between the Great Lakes and Mississippi River basins and not "reduce the risk"; accelerate the timeline for completion of GLMRIS; prioritizing the CAWS portion of GLMRIS; provide for public comment as the study proceeds; and request a hearing in Canada.

Thank you for the opportunity to comment, and for seriously engaging in this study, which is critical to the health of the Great Lakes-St. Lawrence River and Mississippi River basins in both the United States and Canada.

Sincerely,

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