

Thank you for your comment, Brian Gingras.

The comment tracking number that has been assigned to your comment is GLMRIS50441.

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GLMRIS

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Attachment:

Comment Submitted:

We should be taking immediate steps to prevent the Asian Carp from getting in to the Great Lakes and causing the damage that the lamprey has caused. Congress mandated that GLMRIS should only consider “options and technologies available to prevent the spread” of invasive species through the waterways. Physical separation would achieve this. It is not clear at this time that any other alternative would achieve prevention.

The GLMRIS study is a prevention study and its results should be used first to prevent Asian carp from invading the Great Lakes. The study timeline and strategy must be structured so a solution is delivered prior to the establishment of breeding populations of Asian carp in the Chicago Waterway System.

The Corps should study and provide a solution for the Chicago Waterway System first regardless of the need to prioritize and act on other aquatic pathways.

Do not waste time and money repeating work that has already been done or is currently in process.

Risk Assessment: at least two comprehensive reports describing the likely impacts of Asian carp on the Great Lakes have already been written, one from the U.S. Fish and Wildlife Service and one from Fisheries and Oceans Canada. In addition, Fisheries and Oceans Canada recently commenced a bi-national effort to create an updated risk assessment for Asian carp. There is copious literature describing the potential movement of other invasive species via the Chicago Waterway System and the impacts of the movement of zebra mussels into the Mississippi River basin via the CWS are well-documented. There is absolutely no justification for the Corps to place higher priority on conducting its own risk assessment than on preventing the spread of Asian Carp through the CWS.

Wastewater and Transportation: The Great Lakes Commission and Great Lakes-St. Lawrence Cities Initiative (GLC/GLSLCI) are conducting a study on the water management and transportation alternatives available after a physical separation of the Great Lakes and Mississippi River. Other organizations, such as the Alliance for the Great Lakes and the Natural Resources Defense Council, have also described alternatives for achieving prevention through a physical separation. The Corps should incorporate the findings of these projects to hasten its own analysis.

Economic analysis: Likewise, the GLC/GLSLCI includes an economic impact analysis, will be conducted by an elite-tier private engineering and transportation team and should be completed by January 2012. The Corps should use this economic analysis for identifying the best way to achieve physical separation on the Chicago Waterway System rather than writing its own.

The Corps should create an opportunity for regular – preferably at least twice annually - discussion forums during which the public can interact with technical staff for detailed Q&A on project progress. This should be separate and in addition to the requirements of the NEPA process.