

Thank you for your comment, Matthew Thompson.

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GLMRIS

Comment ID: GLMRIS50462

First Name: Matthew

Middle Initial: V

Last Name: Thompson

Organization: Saint Regis Mohawk Tribe, Environment Division

Address: 412 State Route 37

Address 2:

Address 3:

City: Akwesasne

State: NY

Zip: 13655

Country: USA

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Attachment: GLMRIS_SRMT_Comment.pdf

Comment Submitted:

The Saint Regis Mohawk Tribe Submits the following Comment. Please Note the Attached Document is a Final Draft Pending Tribal Council Signature. The Final Comment letter with Signatures will be mailed ASAP.



Saint Regis Mohawk Tribe

Chief Monica M. Jacobs
Chief Mark H. Garrow
Chief Randy Hart
Sub-Chief Pamela D. Brown
Sub-Chief Stacy A. Skidders
Sub-Chief Shelley Jacobs

Ennisko:wa/March 28, 2011

GLMRIS Scoping
Chicago District, U.S. Army Corps of Engineers
111 N. Canal, Suite 600
Chicago, IL 60606
(312)846-5330

She:kon/ Greetings;

The Saint Regis Mohawk Tribe (SRMT) submits the following comments on the Great Lakes Mississippi River Interbasin Study (GLMRIS):

The Saint Regis Mohawk Tribe (SRMT) is the federally recognized governing body of the United States portion of the Mohawk Territory of Akwesasne. The territory is a river-based community that is located on the southern shore of the St. Lawrence River, at the convergence of four tributaries (Grasse, Raquette, St. Regis, and Salmon Rivers). The St. Lawrence River is the primary drainage conveyer of Lake Ontario and as such falls within the Great Lakes basin. Any threat from Aquatic Nuisance Species (ANS) to the Great Lakes would have a direct impact on the St. Lawrence River and thus impact the Mohawk Community.

The Akwesasne Mohawk Nation covers about 15 river miles on both the U.S and the Canadian side of the border. Traditional fishing practices will be impacted greatly with the introduction of ANS, due to the fact that they will compete with habitat and food sources of species such as Sturgeon and Walleye. In addition it will affect other economic and sporting activities. Outdoor enthusiasts that utilize the territory such as trappers, waterfowl hunters, bird watchers, and environmental photographers will also be impacted. It's a local income that needs to be factored in, and considered.

International shipping through the St. Lawrence Seaway has traditionally been the primary vector for the introduction of aquatic invasive species (*Holeck, 2004*). However other vectors that threaten the St. Lawrence and Lake Ontario are canals, trade in live animals and plants, and recreational boating. In addition there have been reports from Credit Valley Conservation (*TNC, 2009*) that illegal fish stocking into storm water management ponds represents an increasing vector of ANS.

Helping Build A Better Tomorrow

412 State Route 37
Akwesasne, New York 13655
Phone: 518-358-2272
Fax: 518-358-5205

Artificial Connections to Lake Ontario have been a vector for the introduction of ANS since the 19th century. For example the blue-black herring was introduced to Lake Ontario and its basin via the New York Oswego-Erie canal which connects Lake Ontario to the Hudson River. The introduction of species via this vector continues to be a concern.

It has become clear in recent news articles and events the greatest threat of ANS to the Great Lakes has become the Mississippi River basin. The most threatening of the species identified is Asian carp due to their rate of feeding and reproduction. It has been noted from the Great lakes Commission that the carp continue to migrate further north through the Illinois River and are dangerously close to entering Lake Michigan. Additional species of concern are snakehead fish which are currently an ANS in the Delaware River basin. Such species should be included in the study due to the hazards they present to the ecosystem, and their presence in United States watersheds.

Asian Carp are a significant threat to the Great Lakes because they are large, extremely prolific, and consume vast amounts of food. They can weigh up to 100 pounds, and can grow to a length of more than four feet. They are well-suited to the climate of the Great Lakes region, which is similar to their native Asian habitats. The carp have steadily made their way northward up the Mississippi, becoming the most abundant species in some areas of the River. Even though the Asian Carp found a different way into the ecosystem than most of the St. Lawrence River's invasive species, without preventative measures they too will be impacting this unique international waterway.

The St Lawrence River Seaway System utilizes 16 Great Lakes ports. This transportation system provides 1.2 billion dollars of cost savings to steel mills, utilities, and other industries located in proximity to the 16 ports (*Martin Associates 2001*.) This in hindsight has presented us with new unmanageable ecological disasters in the form of aquatic invasive species. The Great Lakes fishing commerce is approximately \$1.5 billion in angler expenditures. Invasive Species may be costing an estimated \$200 million in losses due to reduced commercial and sport fisheries, reduced wildlife watching and increased operation costs for industries using the Great Lakes water system (*Finnoff, 2008*). Changes to the "ecosystem service", due to aquatic invasive species have had a vast impact on commercial, recreational, and cultural practices on the St. Lawrence Seaway system.

It is widely recognized that once an ANS has entered a particular Great Lake the species will spread throughout the system. It is this notion that has driven fear and concern over ANS's entering Lake Michigan; because it is then believed it will affect the entire watershed including the St. Lawrence River.

In an effort to halt the flow of ANS from the Mississippi River basin into the Great Lakes artificial connections linking the two watersheds need to be identified and reviewed. If a linkage is identified to pose a threat to the Great Lakes it should be closed to stem the flow of ANS from

entering the Great Lakes Basin. Obvious connections such as the Chicago Waterway system have already been highlighted to be reviewed however many more unknown connections likely exist and pose a similar threat, and need to be identified and reviewed.

According to the Congressional authorization under Section 3061 of the Water Resources Development Act (WRDA) of 2007, it is our understanding the US Army Corp only has authorization to complete a feasibility study regarding the transfer of Aquatic Nuisance Species (ANS) controls. USACE will need additional congressional authorization and funding to design and implement any actual ANS control technology. While it is understood a methodical process is often best when conducting studies regarding water resources, in particular waters that have a huge economic role in the larger basin, sometimes a condensed time table of studies is needed when the threat to the world's largest freshwater system is glaringly obvious, is current, and extremely relevant.

This Project Management Plan (PMP) is to evaluate all ANS that may pass between the Mississippi Basin and the Great Lakes via man-made canal structures, and natural flow connections. The current plan identifies steps to take to identify problems, and develop solutions. The results of this study are proposed to be complete in 2015. Although the current feasibility study timetable may be appropriate for the majority of ANS that may not be an immediate threat, the current proposed time table for the spread, and invasion of Asian Carp is not acceptable. We suggest modifications and additional considerations below:

- 1.) The proposed study is too long in length. The Corps should acknowledge the urgency of the risks of invasion of Asian Carp to the Great Lakes and St. Lawrence River watershed, and condense timetable for the feasibility study, and completion of alternative results to be complete within 18 months (i.e. complete by end of 2012, rather than 2015). Congressional authorization was given in 2007, four years ago with over \$100 million already invested in Emergency Action Costs specific to Asian Carp. That is four years of time lost on studies that could have been conducted to conduct a proper feasibility study for development of actions and alternatives for hydraulic separation to prevent or reduce the risk of ANS between basins. The continued delay, and proposed length of development of alternatives for a solution is unacceptable.
- 2.) Although it is typically preferred that a feasibility study focus on all species of concern, in this case all ANS, the immediate threat to our water resources, in particular recreation and cultural resources, is from the Asian Carp. The Army Corp should develop a way to separate feasibility study objectives for Asian Carp vs. all other ANS. USACE should study and provide a solution for the Chicago Waterway System first regardless of the need to prioritize and act on other aquatic pathways.
- 3.) This "PMP" should include an option for evaluation of short-term hydrological separation with adaptive management, while concurrently evaluating the economic and environmental impacts to be developed into a larger feasibility plan and development of Alternatives. This immediate response action allows for an agency to make progress on

elimination, prevention, or risk reduction of a threat/harm to the environment and human health while feasibility studies for development of a long-term solution can be developed in a methodical analysis of alternatives. We are aware some Emergency Actions have already been implemented, such as improve and operate electric barriers, kill zones, and modify lock operations that have cost over \$100 million dollars to date. But if hydrologic separation is a potential long-term solution, it could be developed into a short-term action as well that may help curtail some of the immediate threats.

In addition identifying options to prevent the spread of ANS between the Great Lakes needs to be considered. The major connection between Lake Ontario and the other Great Lakes that is passable for species is the Welland Canal. Biological barriers placed in the Welland Canal would stem the flow of ANS into Lake Ontario and the St. Lawrence River. Additional secondary biological barriers should be considered for similar connecting waterways throughout the Great lakes as well. Similar steps such as cargo transfer stations, small watercraft lifts, and cleaning stations on connecting waterways throughout the Great Lakes would help as well without the interruption of Seaway travel.

The “Future without Project” condition (*PMP page 11*) needs to be addressed. The ecological risks and impacts of ANS from the Mississippi Basin are by no means currently known but recent history, and lessons learned have demonstrated that introduced species often thrive in the Great Lakes/St. Lawrence River ecosystem, competing with indigenous species. This has been observed with many species, including the recent invasion of the Round Gobi, an ANS that has overwhelmed the St. Lawrence River competing with such species as Ground Pike, Log Perch, Spot tail and Emerald shiners, thus affecting the food web to predatory fish and mammals.

Legal and Political Controls (*PMP page 12*) also need revision. Passage and enforcement of laws with fines are in place with the respect to ballast water but are not being enforced very well. This PMP should fully evaluate effective measures of enforcement of ANS management between Mississippi and Great Lakes Watershed Basins. Also education needs to be incorporated into this PMP. Fisherman and boat enthusiasts need to be educated that they are responsible for their own vessels and what is transported in or on them. Have public seminars on aquatic invasive species to show them what they are looking for and the best practices for avoiding transportation of Asian Carp or other species. An education component to the public as well as to the commercial navigation was not developed enough in this plan.

Economic evaluation of current conditions (*PMP page 23*) does not encompass all of the users appropriately. Water users are listed but focus is still on fisheries. When doing an economic evaluation there are also many other outdoor sporting practices that use the waterway that are contributing to the local and state economy, and will be affected/impacted by ANS, in particular, Asian Carp.

Communications (*PMP page28*) lists a variety of ways to address the public. This is where the St. Lawrence River network could fit in, representatives from, Area of Concern Advisory Committees, St. Lawrence River organizations, and sportsman organizations that are potentially impacted could express their concerns to an extended study being done vs. the “soon as possible action” that is needed.

The impacts from ANS on a watershed have been documented and studied. They alter food webs in fundamental ways, and greatly impact all native species (*Meyerson 2003*). Damage to the Great Lakes from current ANS is well documented and has been highlighted on Lakewide Management Plans and Remedial Action Plans under the Great Lakes Water Quality Agreement. If additional Aquatic Nuisance Species are not stopped from entering the Great Lakes through these potential pathways from the Mississippi River basin, native species may not be able to respond and recover.

If you have any questions, concerns, or comments, please feel free to contact the Environment Division of the SRMT at 518-358-5937. Niawen/Thank you.

Sken:nen/Peace,

Tribal Chief

Monica M. Jacobs

Mark H. Garrow

Randy Hart

Cc: Elizabeth Naticoke, Mohawk Council of Akwesasne
Dave Arquette , HETF Director
Stephen Litwhiler, NYSDEC
Barbara Belasco, USEPA Region 2

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