

Thank you for your comment, Dennis Riecke.

The comment tracking number that has been assigned to your comment is GLMRIS50575.

Comment Date: March 30, 2011 22:31:17PM

GLMRIS

Comment ID: GLMRIS50575

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

Attachment: Corps\_Great Lakes Miss River Basin separation study.doc

Comment Submitted:



**MISSISSIPPI  
DEPARTMENT OF WILDLIFE, FISHERIES AND PARKS**

**SAM POLLES, Ph.D  
Executive Director**

March 30, 2011

GLMRIS Scoping  
111 N. Canal, Suite 600  
Chicago, IL 60606

Dear US Army Corps of Engineers,

The Mississippi Department of Wildlife, Fisheries, and Parks is pleased to provide comments on the Great Lakes and Mississippi River Interbasin Study. We support and endorse this important study.

While we acknowledge that through research and operation of the electrical fish barriers in Chicago Sanitary and Ship Canal, the US Army Corps of Engineers has been at the forefront of efforts to prevent Asian carp from gaining access to the Great Lakes. However, there are substantial costs and risks of relying on these measures as an effective and permanent response to this situation.

We believe the authorized study will provide federal, state and local government agencies, officials and the general public with a comprehensive analysis of the costs, benefits, advantages, disadvantages and risks associated with a variety of proposed alternatives on how preventing the introduction of Asian carp into the Great Lakes via this waterway will impact various user groups, interests and our natural resources.

We recognize that the Chicago Sanitary and Ship Canal is an unnatural, man-made waterway intended to improve shipping while also providing floodwater and wastewater conveyance for the City of Chicago. The study should emphasize alternative ways all these functions could be accomplished if the hydraulic link between the Great Lakes and the Mississippi River Basin was severed and--- in that sense ----returned to the historic, natural condition.

We recognize that the natural resources of the Great Lakes and the sport and commercial utilization of them is a national treasure. We recognize that such resources are irreplaceable and could suffer irreparable harm should Asian carp gain entry into the Great Lakes. While it is unknown whether or not Asian carp will become invasive in the Great Lakes, we believe it is unwise to assume or hope they will not be invasive because examination of the historical distributional record of these fishes reveals they have not been deemed noninvasive in any geographic area outside of their native range. We believe this risk is too great to let our response rely on hope and assumptions rather than deliberate actions.

We are confident that should Asian carp gain entry into the Great Lakes, their eradication from these water bodies will be impossible. Experience reveals that they have not been eradicated from any major natural water body they have invaded. The study should emphasize that fact and recognize that a new situation ---one man cannot control---with perhaps tragic consequences will exist in perpetuity.

The study should include a discussion of the economic impacts of all proposed alternatives. The economic analysis should include the monetary value of ecosystem services the Great Lakes currently provide and how those values would be impacted by the introduction of Asian carp.

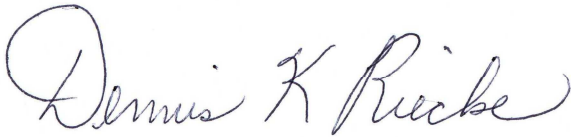
Water is at the heart of this issue. It is our understanding that the City of Chicago extracts drinking water from the Great Lakes and after sanitary treatment, discharges it into the Chicago Sanitary and Ship Canal. Since such discharges then flow into the Mississippi River Basin, the entire amount of water extracted is considered a consumptive use and therefore, the amount of water the City of Chicago extracts from the Great Lakes is limited by existing state regulations. If a physical dam was placed in the Chicago Sanitary and Ship Canal to separate the two water systems, Chicago's wastewater would either have to be pumped over this physical barrier or discharged back into the Great Lakes. The latter option can be considered a neglected, unutilized opportunity for economic growth.

It is our understanding that if the City of Chicago discharged its treated wastewater that it originally extracted from the Great Lakes back into the Great Lakes --- like other cities do --- it could be permitted to use either an unlimited amount or a significantly greater amount of water from the Great Lakes. If our understanding is correct, that benefit alone provides a very appealing justification for the City of Chicago and all its water users to support the aquatic ecological separation of the Great Lakes and the Mississippi River Basin. An economic analysis of providing for Chicago's future water needs and the capacities of other water resources to meet these water needs should be a part of this study.

The study should emphasize that this is a binational issue and consider impacts to both the United States and Canada. The study should seek and incorporate Canadian concerns and issues throughout the study document. As such, debate concerning what study recommendation(s) to implement should occur on a binational stage and not be confined merely satisfy local, vested interests or just the interests of the United States.

It is our hope that Asian carp will not swim their way into the Great Lakes prior to the projected completion date of 2015 for this study. We encourage you to release parts of your study as they become available and to devote all possible resources to endeavor to complete this study prior to that target date.

Sincerely

A handwritten signature in dark ink, reading "Dennis K Riecke". The signature is written in a cursive style with a large, looped initial "D".

Dennis Riecke  
Fisheries Coordinator

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