

Thank you for your comment, Brian Smith.

The comment tracking number that has been assigned to your comment is GLMRIS50581.

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GLMRIS

Comment ID: GLMRIS50581

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Attachment:

Comment Submitted:

CCE is an 80,000 member, non-profit, non-partisan organization that works to empower communities and advocate solutions to protect public health and the environment in New York and Connecticut. CCE thanks the Army Corps of Engineers ("Corps") for the opportunity to provide comments on the Great Lakes and Mississippi River Interbasin Study.

Invasive species threaten the Earth's biodiversity, second only to habitat loss. Aquatic Invasive Species, or Aquatic Nuisance Species (ANS), have already had a tremendous adverse impact to the health and economy of our Great Lakes, with approximately 187 already established within the lakes. Top scientists recognize that our Lakes are on the tipping point of ecological collapse, and further damage, especially from Asian carp, would be devastating and irreparable. The importance of taking action to prevent the invasion of Asian carp into our Great Lakes cannot be overstated. In particular:

- Asian carp are voracious filter feeders that could destroy the \$7 billion fishery in the Great Lakes, and threaten the \$16 billion tourism industry in the Great Lakes.
- Asian carp send boaters to the hospital. They have already sent many Illinois boaters to the hospital because they weigh as much as 100 pounds and leap into the air at the sound of a passing boat motor.

In general, CCE believes that the current study plan to deal with this threat proposed by the Corps is inadequate, and will fail to protect our Great Lakes from the certain devastation that would be caused from breeding populations of Asian Carp reaching our Great Lakes. Furthermore, the proposed plan does not adhere to the intent of Congress's directive in the 2007 Water Resources Development Act (WRDA), which mandates that the Corps perform a study specifically focused on preventing ANS from spreading between the basins.

Timeline is too slow

An ounce of prevention is worth a pound of cure. This statement is especially relevant to battling the invasion of ANS. Once a new species establishes itself, it is almost impossible to remove and incredibly difficult to contain. In addition, investments needed for prevention are modest compared to the immense damage and control costs. It is estimated that damage and control costs for ANS in the Great Lakes totals approximately \$5 billion annually. Asian carp reaching the lakes would only bolster these tremendous costs.

Due to their large size, ravenous appetites, and rapid rate of reproduction; breeding populations of Asian carp would be particularly expensive to control; and difficult, if not impossible, to eradicate once they have reached our Great Lakes. This is evident from their proliferation in the Illinois River, where Asian carp make up 90% of fish found in the River, where none existed a couple decades ago.

The only chance we have to stop Asian carp from devastating our Great Lakes ecosystem is to implement a prevention strategy as soon as possible. The Asian carp are on the doorstep, and waiting five years to complete a study, and then take action, would be too late and is therefore unacceptable. CCE strongly recommends that the timeline for completion of the Corps study be complete in 18 months or sooner.

Need a permanent solution

We will not be able to separate the Great Lakes from the Mississippi in a day; therefore, every solution must be on the table to prevent Asian carp from invading the lakes in the short term, including chemical treatments, lock closures, and more. However,

while we must do everything in our power to prevent carp from reaching the lakes in the near term, strictly using band aids will not work as a long term solution. We need a permanent solution that will solve the problem. Restoring the original hydrologic separation of the Great Lakes and Mississippi River basins is the most effective permanent method of achieving this goal. Therefore, the Corps' study must focus on "how" to separate the basins, not "if" we should separate the basins.

The Corps should not be doing another risk assessment. The proposed study flies in the face of the clear Congressional intent to conduct a study "to prevent the spread of aquatic nuisance species between the Great Lakes and Mississippi River Basins." The Congressional mandate DOES NOT ask for a study to "reduce the risk" of ANS spreading between the basins. Multiple entities have done risk assessments for Asian carp, including the U.S. Fish and Wildlife Service and Fisheries and Oceans Canada. Let's not reinvent the wheel. Let's not waste time. CCE strongly recommends that the scope of the study focus on prevention, and remove references to reducing the risk of Asian carp invasion in to the Great Lakes.

Thank you for your consideration.