

Thank you for your comment, Patty Birkholz.

The comment tracking number that has been assigned to your comment is GLMRIS50602.

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GLMRIS

Comment ID: GLMRIS50602

First Name: Patty

Middle Initial: L

Last Name: Birkholz

Organization: Office of the Great Lakes

Address: 525 West Allegan Street

Address 2:

Address 3:

City: Lansing

State: MI

Zip: 48933

Country: USA

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

Attachment: GLMRIS.pdf

Comment Submitted:

Comments attached.



STATE OF MICHIGAN
OFFICE OF THE GREAT LAKES
LANSING

RICK SNYDER
GOVERNOR

PATRICIA BIRKHOLZ
DIRECTOR

March 31, 2011

GLMRIS Scoping
111 North Canal, Suite 600
Chicago, Illinois 60606

To Whom It May Concern:

This letter is a response to the request for comments on the scope of the Great Lakes Mississippi River Interbasin Study (GLMRIS) being conducted by the U.S. Army Corps of Engineers (Corps), Federal Register Notice 75 FR 69983.

Michigan has been broadly engaged with actions protecting the Great Lakes from Asian carp for many years. We believe that the presence of Asian carp in the Great Lakes would have devastating environmental, economic, and social impacts on Michigan. Preventing that occurrence provides the driving force for our engagement. Governmental actions to date have been primarily focused on interim measures that only superficially address a very real ecological and economic emergency. The only permanent solution to movement of Asian carp and other invasive species between the Mississippi River Basin and the Great Lakes Basin is to physically separate the watersheds. In previous communications with the Corps, the White House Council on Environmental Quality, Congress, and others, Michigan has consistently called for that physical separation.

Michigan is likewise concerned with other aquatic invasive species and other introduction pathways that are generally covered under the GLMRIS study. Given the magnitude of the potential impact, however, we strongly believe that the Corp must effectively focus the majority of its efforts first on Asian carp and the pathways available via the Chicago area waterways system (CAWS). Actions taken to prevent the movement of Asian carp into Lake Michigan through the CAWS will also prevent other aquatic species from using the same pathway.

To that end, Michigan strongly maintains that the GLMRIS must be:

1. Focused on prevention. The Corps must retain the prevention standard for the study. Invasive species are so devastating to the environment and the economy that all necessary precautions must be taken to prevent their introduction and spread. Merely "reducing the risk" of invasive species transfer is not enough and it is not the objective that Congress established in the authorizing legislation.
2. Sequenced to be timely. The CAWS part of the GLMRIS must be the highest priority for the Corps, and as such must be completed no later than

December 2012, with implementation actions implemented immediately thereafter. The Corps must focus first and foremost on Focus Area I, the CAWS open pathways for invasive species to transfer between the two basins.

3. Integrated with other studies. The Corps must make full use of other independent and agency studies related to the scope of GLMRIS. Duplication of effort would waste valuable time and scarce resources. Much of what is proposed for the GLMRIS exists now or will soon exist. For example, the Great Lakes Aquatic Non-indigenous Species Information System of the National Oceanographic and Atmospheric Administration has listed both current and future potential invasive species in the Great Lakes. The GLMRIS can simply refer to those lists and need not duplicate the work. Similarly, the study being conducted on the CAWS by the Great Lakes Commission and the Great Lakes and St. Lawrence Cities Initiative should provide valuable insights into effective steps that can be taken in the near term to physically separate the Mississippi and Great Lakes basins. The Natural Resources Defense Council is also actively studying options for infrastructure changes in the CAWS to prevent the transfer of invasive species. The Corps should make every effort to use the results from all studies as a basis for action.
4. Ultimately focused on implementation. Michigan is aware that GLMRIS is just the study phase and that permanently protecting the Great Lakes will come only from implementation of recommendations. The underlying purpose of GLMRIS—to prevent the transfer of aquatic invasive species between the Mississippi River and Great Lakes basins—must serve as the conceptual foundation for all aspects of the effort. This is not a study for study's sake and implementation of efficacious components need not await completion of the full study. The Corps should look for every opportunity to implement components of the overall effort as quickly as possible, even while other components remain under study.

Michigan stands ready to assist the Corps with any aspect of the GLMRIS relevant to our state. We ask that you consult with Michigan on an ongoing basis as the study and related actions move forward.

Sincerely,



Patricia Birkholz, Director
Office of the Great Lakes
517-335-4056

cc: Governor Rick Snyder
Mr. Dan Wyant, Director, Michigan Department of Environmental Quality (MDEQ)
Mr. Rodney Stokes, Director, Michigan Department of Natural Resources (MDNR)