



# GREAT LAKES AND MISSISSIPPI RIVER INTERBASIN STUDY

## GLMRIS REPORT PUBLIC COMMENT SUMMARY

MAY 2014



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## ACRONYMS

ANS	Aquatic Nuisance Species
CAWS	Chicago Area Waterway System
GLMRIS	Great Lakes and Mississippi River Interbasin Study
HQUSACE	Headquarters of United States Army Corps of Engineers
MAP-21	Moving Ahead for Progress in the 21st Century Act
NEPA	National Environmental Policy Act
PED	Preconstruction Engineering and Design
USACE	United States Army Corps of Engineers
WRDA	Water Resources Development Act

## **1 INTRODUCTION**

This Public Comment Summary for the GLMRIS Report presents an overview of the public comments received during the January 6 through March 31, 2014 public comment period for the Great Lakes and Mississippi River Interbasin Study (GLMRIS) Report. The GLMRIS Report, public comments received during the public comment period, public meeting materials, public meeting transcripts and other information pertaining to the Report's public outreach efforts can be found at <http://glmris.anl.gov/glmris-report/>.

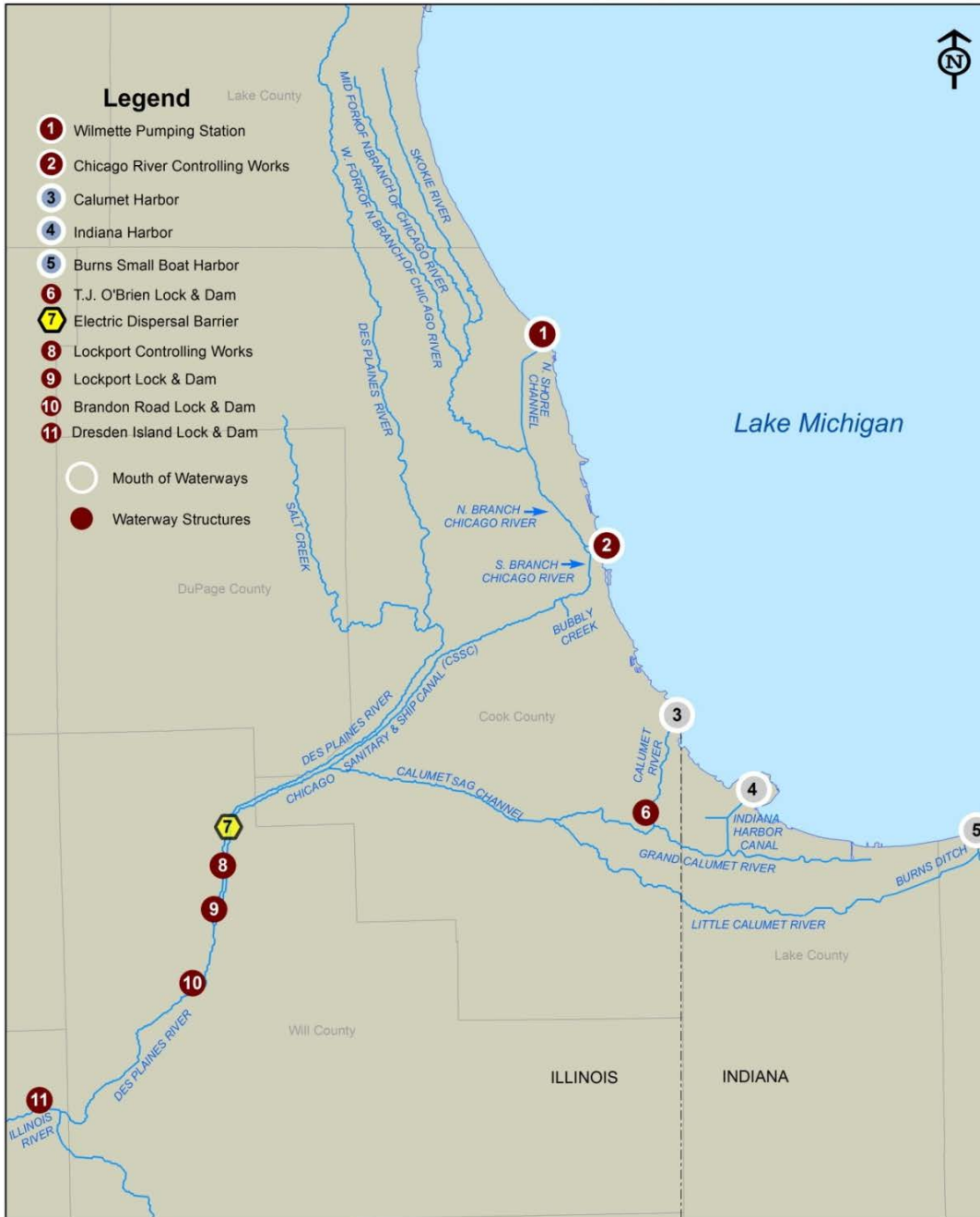
The GLMRIS Report presents a comprehensive range of options and technologies available to prevent the interbasin transfer of aquatic nuisance species (ANS) between the Great Lakes and Mississippi River through aquatic pathways. The United States Army Corps of Engineers (USACE) pursued a structured study process to identify ANS of Concern, and then formulated and analyzed a suite of options and technologies to prevent transfer between the two basins, specifically within the Chicago Area Waterway System (CAWS). This Public Comment Summary supplements the GLMRIS Report, and is intended to inform the public dialogue concerning possible future actions to prevent interbasin transfer of ANS.

### **1.1 STUDY AUTHORITY**

GLMRIS was authorized by Section 3061(d) of the Water Resources Development Act of 2007 (WRDA 2007), Public Law 110-114. Specifically, the statute authorizes the Secretary of the Army (Secretary), acting through the Chief of Engineers, to conduct a feasibility study of the range of options and technologies available to prevent aquatic nuisance species from spreading between the Great Lakes and the Mississippi River basins. This authority differs from a traditional USACE feasibility study authorization in that it directs the identification and assessment of a range of available options and technologies, rather than requiring the recommendation of a single plan.

In March 2009, Headquarters of USACE (HQUSACE) issued implementing guidance for Section 3061 of WRDA 2007. The implementation guidance directed the study to include an analysis of the impacts associated with the implementation of any alternative plans on existing uses and users of the CAWS and an assessment of the need to mitigate for any such impacts.

In July 2012, the GLMRIS authority was modified by Section 1538 of the Moving Ahead for Progress in the 21st Century Act (MAP-21), Public Law 112-141. MAP-21 directs the Secretary to expedite the completion of the report for the study, and, if the Secretary determines a project is justified, to proceed directly to Preconstruction Engineering and Design (PED). MAP-21 also directs the Secretary to focus the report on the CAWS (GLMRIS Focus Area 1), and to include an analysis of hydrologic separation as a means to prevent the spread of aquatic nuisance species between the Great Lakes and Mississippi River basins.



**Figure 1. GLMRIS Focus Area 1: Chicago Area Waterway System (CAWS)**

The GLMRIS Report does not include a National Environmental Policy Act (NEPA) analysis, because “planning and technical studies which do not contain recommendations for authorization or funding for construction, but may recommend further study” are categorically excluded from NEPA documentation requirements (See 33 C.F.R. § 230.9 (d)). Although not required by the study authority, the Secretary retains the discretion under the study authority to recommend a specific alternative. NEPA compliance documentation, along with other additional detailed

analyses and requirements, would need to be completed prior to USACE implementing a specific plan.

Per the MAP-21 authority, the GLMRIS Report focuses on the five direct connections between the Great Lakes and the Mississippi River basins, shown in Figure 1. USACE evaluated all potential aquatic pathways between the Great Lakes and Mississippi River basins, and then divided them into two focus areas. Focus Area 1 consists of the aquatic pathways within the CAWS, which are the only continuous aquatic connections between the basins. Focus Area 2 includes all of the other potential aquatic pathways between the basins. A summary of current activities in Focus Area 2 can be found in Appendix N of the GLMRIS Report and on the GLMRIS website.

## 1.2 THE GLMRIS REPORT

The GLMRIS Report presents eight alternative plans and evaluates the potential of these alternatives to prevent the transfer of ANS between the Great Lakes and Mississippi River basins. Impacts to uses and users of the CAWS were evaluated for each alternative, and methods to address these impacts were included in the alternatives. The GLMRIS Report does not recommend a specific plan. However, evaluation criteria are included in the report that could be used by decision makers to further evaluate and compare the alternative plans.

**Table 1. GLMRIS Alternative Plans**

1	No New Federal Action – Sustained Activities
2	Nonstructural Control Technologies
3	Mid-System Control Technologies without a Buffer Zone – Flow Bypass
4	Technology Alternative with a Buffer Zone
5	Lakefront Hydrologic Separation
6	Mid-System Hydrologic Separation
7	Hybrid – Mid-System Separation Cal-Sag Open
8	Hybrid – Mid-System Separation CSSC Open

On January 6, 2014, USACE posted a Notice of a Comment Period in the *Federal Register*. In the notice, USACE announced a series of public meetings regarding the GLMRIS Report and a comment period during which USACE sought public comments on the alternatives presented in the Report. On February 18, 2014, USACE posted a notice extending the public comment period to March 31, 2014. Copies of comments received during the public comment period and transcripts of the public meetings are available on the GLMRIS project Web site.

## 2 THE PUBLIC COMMENT PROCESS

### 2.1 PUBLIC OUTREACH

USACE public outreach for GLMRIS includes maintaining a project Web site that provides background information about aquatic nuisance species, ANS Controls, and the GLMRIS project. The Web site also provides interim products released in advance of the GLMRIS

Report, public comments submitted about the interim products, and news and events specific to GLMRIS and ANS control and awareness. The GLMRIS Web site also includes a page dedicated to the GLMRIS Report and its public outreach materials, and provides the opportunity to subscribe for email notices and quarterly newsletters regarding project-related information and newscasts. As this summary goes to print, GLMRIS has nearly 800 e-mail address subscriptions, more than 370 Facebook fans and more than 500 followers on Twitter.

The GLMRIS Report was submitted to committees of the U.S. Congress on January 6, 2014, including the Senate Committee on Environment and Public Works, the House Committee on Transportation and Infrastructure, and the Senate and House Committees on Appropriations. A briefing for members of Congress and their staff was held on January 6, 2014 by conference call, and a follow-up question and answer session was held in Washington, D.C. on January 8, 2014. Thirty-nine members and staff participated.

USACE invited the public to comment on the alternatives presented in the GLMRIS Report via the online comment form on the project Web site; standard mail; and in person at the public meetings, by either testifying or submitting written comments. The public comment period began on January 6, 2014 with the release of the GLMRIS Report and ended March 31, 2014. The original deadline for submitting comments was extended from March 3 to March 31, 2014 in response to requests from the public.

In January and February of 2014, USACE held 11 public meetings at key locations within the GLMRIS study area, shown in Figure 2. Meetings were initially scheduled in the following locations:

- Chicago, Illinois
- Milwaukee, Wisconsin
- Cleveland, Ohio
- Ann Arbor, Michigan
- Traverse City, Michigan
- Twin Cities, Minnesota
- St. Louis, Missouri

In response to high public interest, additional meetings were scheduled in the following locations:

- Erie, Pennsylvania
- New Orleans, Louisiana
- Northwest Indiana (Portage)
- Buffalo, New York



**Figure 2. GLMRIS Report public meetings**

Meeting dates and locations are summarized in Table 2.



**Table 2. GLMRIS Report public meeting locations**

<i>Location</i>	<i>Date</i>	<i>Venue</i>
Chicago, IL*	Jan 9, 2014	University of Chicago, Gleacher Center
Milwaukee, WI	Jan 13, 2014	Milwaukee Area Technical College
Cleveland, OH	Jan 16, 2014	Cleveland Public Library
Ann Arbor, MI*	Jan 21, 2014	University of Michigan League
Traverse City, MI	Jan 23, 2014	The Hagerty Conference Center, Northwestern Michigan College – Great Lakes Campus
Erie, PA	Jan 24, 2014	Erie County Library
Twin Cities, MN	Jan 27, 2014	Refuge Headquarters and Bloomington Education and Visitor Center
St. Louis, MO	Jan 30, 2014	National Great Lakes Rivers Museum, Alton, IL
New Orleans, LA*	Jan 31, 2014	USACE-MVN District Assembly Room A
Northwest Indiana	Feb 11, 2014	Northwest Indiana Planning Commission Auditorium, Portage, IN
Buffalo, NY	Feb 13, 2014	Buffalo Central Library Auditorium

\* Web access was available.

Prior to each public meeting, a press release was distributed to local media outlets. The press release provided a general notice, a description of the project, and a request for public comments. Each press release included dates, times, and locations of the public meetings (Attachment 1). Additionally, notices were placed in newspapers of general distribution in the area surrounding the meeting location (Attachment 2). Notices also included a description of the project, request for public comment, and the dates, times, and locations of the public meetings. Opportunities for public input on the GLMRIS Report were also publicized through notices posted in the *Federal Register*, subscription email notices, GLMRIS press releases, newspaper notices regarding GLMRIS, and GLMRIS mailings.

Print materials distributed at each of the meetings included: a meeting agenda; a Summary of the GLMRIS Report; and several pages of Frequently Asked Questions. The public was able to register to speak in advance of each meeting via the GLMRIS project web site. Participants also registered to speak and submitted written comments at the meetings. The public meetings began at 4:00 pm and generally ended between 6:00 and 7:00 pm. At each of the meetings, representatives from the White House Council on Environmental Quality (CEQ) offered opening remarks about the Asian Carp Control Strategy Framework and Monitoring and Response Plan being implemented by the Asian Carp Regional Coordinating Committee (ACRCC). USACE staffed each meeting with agency representatives who then gave a presentation summarizing the GLMRIS Report with a focus on the alternatives described in the report. The Honorable Jo-Ellen Darcy, Assistant Secretary to the Army (Civil Works) joined the panel of speakers at the Chicago and Ann Arbor meetings, and Brigadier General Margaret Burcham, Commander of the USACE Great Lakes and Ohio River Division, spoke at the Ann Arbor meeting.

After the presentation, the public was invited to provide comments and ask questions. USACE provided Web access for the Chicago, Ann Arbor and New Orleans public meetings. This feature allowed those unable to attend the meetings in person the option of participating via

conference line and webinar. Court reporters recorded the proceedings of each meeting. Transcripts, copies of the displays and handouts, the Chicago meeting webinar, and a video of the Ann Arbor, MI public meeting presentation are posted at <http://glmr.is.anl.gov/glmris-report/>. USACE also arranged interviews with reporters from television, radio and print media outlets in order to facilitate the widest possible dissemination of information gathered in the GLMRIS Report.

During the public comment period, the GLMRIS Team also held eight meetings with state agencies in Illinois, Indiana, Ohio, Pennsylvania, Michigan, Minnesota, New York and Wisconsin. A number of dedicated briefings were held for state and local organizations on request. The Great Lakes and St. Lawrence Cities Initiative and the Invasive Species Centre hosted an informational meeting in Toronto, Ontario on March 27 and the U.S. Embassy in Ottawa, Ontario, hosted a similar session about the GLMRIS Report the following day.

## 2.2 METRICS

### 2.2.1 Metrics for Public Comments

Statistics presented in this summary capture comments submitted by mail, e-mail, website submission, and spoken at public meetings. Several thousand signatories provided input through two letter-writing campaigns, which are discussed further in section 2.2.3. Comments submitted via third-party campaign websites are not included in the metrics shown below.

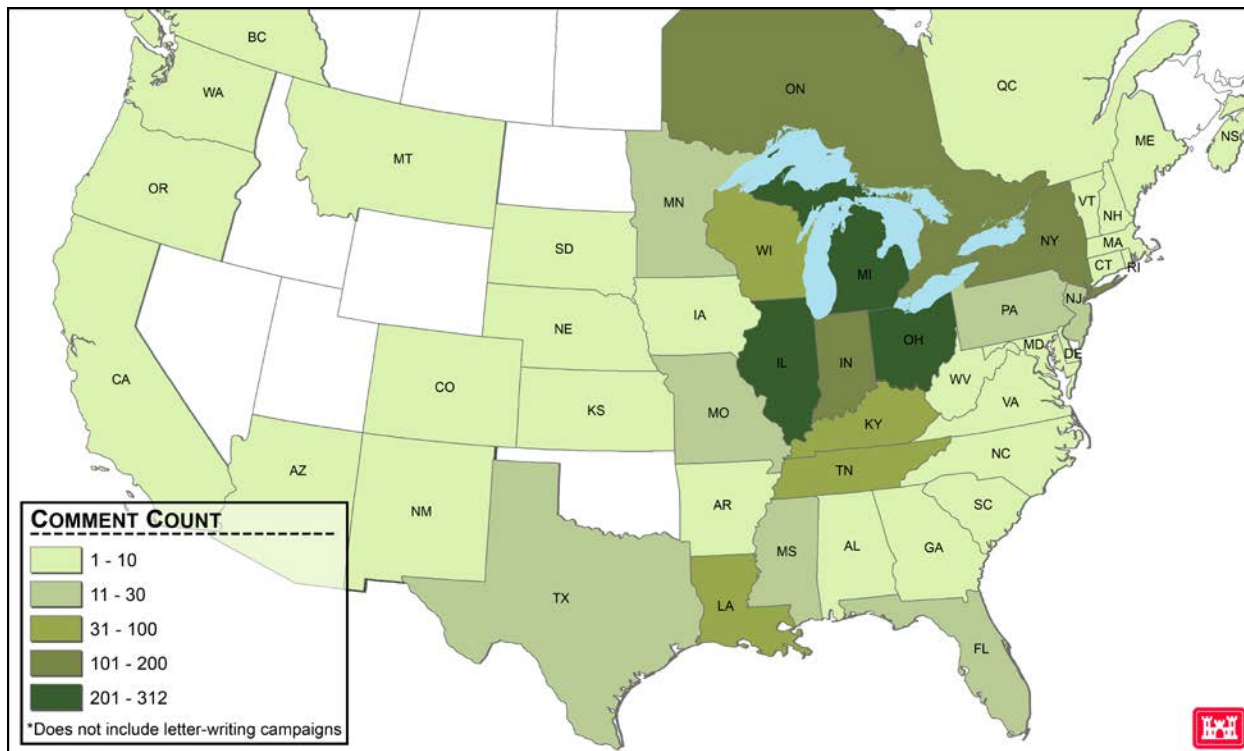
USACE received over 1600 comment submittals on the GLMRIS Report from over 1800 individuals, organizations, and state and local government agencies. Eighty-two percent of individual comments were submitted via the GLMRIS Web site; 12 percent at public meetings; and 6 percent by mail. Some people submitted more than one document or used more than one method to submit comments; some documents were signed by multiple people.

Comments were received from forty-three (43) U.S. states and the Canadian provinces of Ontario, Quebec and British Columbia. Over half of the comments originated from Michigan, Illinois, Ohio, and Indiana, as shown below in Table 3 and in Figure 3.

**Table 3. Geographic distribution of public comments\***

Michigan	17%
Illinois	17%
Ohio	14%
Indiana	10%
Ontario, Canada	9%
New York	7%
Louisiana	6%
Tennessee	4%
Other	16%

\*Does not include letter-writing campaigns



**Figure 3. Geographic distribution of public comments**

### 2.2.2 Public Meeting Metrics

More than 650 people attended the GLMRIS Report public meetings, from 13 U.S. states and the Canadian province of Ontario. Over 60% of participants listed the states of Michigan, Illinois, or Ohio as their home address, as shown in Table 4.

The GLMRIS public meetings were attended by people from Federal, state and local agencies, elected officials, news media, environmental groups, people affiliated with the navigation industry, and other interested parties. More than 100 people attended the Cleveland and Traverse City meetings and more than 90 people attended both the Chicago and Ann Arbor public meetings. Attendance at the other meetings ranged from 25 to 45 people.

About 185 individuals provided oral comments at one or more meetings. Eight people submitted a written comment at the public meetings, but not an oral comment. Nearly 35% of the speakers stated during their comment that they represented an organization. Table 5 lists the number of commenters for each meeting, both oral and written.

**Table 4. Geographic distribution of meeting participants**

Michigan	27%
Illinois	20%
Ohio	18%
Pennsylvania	6%
New York	5%
Wisconsin	4%
Louisiana	3%
Other	23%

**Table 5. Comments per meeting**

	Oral Comments	Written Comments Only
Chicago, IL	22	0
Milwaukee, WI	8	2
Cleveland, OH	24	1
Ann Arbor, MI	35	1
Traverse City, MI	28	2
Erie, PA	17	0
Twin Cities, MN	7	1
St. Louis, MO	13	0
New Orleans, LA	11	0
Northwest Indiana	14	1
Buffalo, NY	6	0

### 2.2.3 Campaigns

Campaigns include identical or very similar comment letters that were submitted to USACE by an organization as a single group. For the purpose of the statistics reported in this summary, the cover letter or form letter used by the organization was counted as a single response.

The Sierra Club provided a comment letter that people could submit via their Web site. Nearly 2,300 people from Illinois, Ohio and Wisconsin submitted a comment using the Sierra Club web form. The letter states that hydrological separation is the only permanent solution that addresses all aquatic invasive species. No GLMRIS alternatives were specifically mentioned. The letter from the Illinois chapter recommends phased implementation and that interim measures be pursued while a permanent separation is being constructed. The Wisconsin and Ohio letters stress the potential economic impacts of Asian carp establishment in the Great Lakes and criticize the existing electric barriers as “flawed and ineffective.”

Clean Wisconsin submitted a petition via the GLMRIS project Web site that was signed by more than 5,000 people. Their letter argued for the permanent, physical separation of the Great Lakes and Mississippi River basins and named GLMRIS Alternatives 5 and 6 as the preferred alternatives.

## 2.3 PUBLIC MEETING SUMMARIES

The following summaries are included to provide the reader with information about meeting attendees and speakers, and alternative preferences expressed by people from different locations throughout the Great Lakes and Mississippi River basins. Some of the speakers had questions about the GLMRIS project, but did not offer any comments. Forty-five percent of people who spoke at the meetings or provided written comments were in favor of some type of physical separation. Only 11 people mentioned a specific alternative; the others spoke in general terms about physical or hydrological separation. Nearly 15 percent wanted a solution that would allow for navigation to continue in the CAWS. Thirty-two percent talked about the importance of controlling ANS, but did not discuss alternatives.

Forty-two percent of the commenters were concerned about estimated time needed to implement the proposed alternatives, stressing that solutions must be implemented sooner. Twenty percent said the proposed ANS control measures were worth the expense.

**Chicago, IL, January 9** - Ninety people signed in at the Chicago meeting from Illinois (90%), Indiana, Wisconsin, and Missouri. A representative for U.S. Senator Dan Coats from Indiana attended the meeting. Forty-six participated in the meeting via webinar and conference call, from Illinois (48%), Michigan (13%), Washington D.C. (11%), Wisconsin, Indiana, Missouri, Kansas, Ohio and Mississippi.

Twenty-two people spoke at the Chicago meeting, including Indiana Attorney General Greg Zoeller, representatives from environmental organizations, people in the marine navigation industry, and members of the general public. Nine people spoke in favor of some type of physical separation; six wanted an alternative that would keep the CAWS open for navigation; and seven people discussed the importance of stopping ANS, without indicating a preference for an alternative.

**Milwaukee, WI, January 13** - Nearly 30 people attended the Milwaukee meeting, from Wisconsin (93%), Illinois and Kansas. Attendance included representatives for U.S. Senators Tammy Baldwin and Ron Johnson from Wisconsin. Eight people provided oral comments; two people submitted written comments only. Commenters included people affiliated with environmental organizations and members of the general public. Three people advocated some form of physical separation; two preferred options that kept the CAWS open for navigation. Other commenters offered several ideas for controlling ANS.

**Cleveland, OH, January 16** - One hundred and twenty people attended the Cleveland meeting from the states of Ohio (97%), New York and Michigan. Attendees included U.S. Representative Marcy Kaptur from Ohio; representatives for U.S. Senator Rob Portman and U.S. Senator Sherrod Brown both from Ohio; Ohio Attorney General Mike DeWine; and Kyle Paine, Mayor of Kelleys Island, Ohio.

Twenty-four people provided oral comments, including Ohio Attorney General Dewine; Representative Kaptur; a person affiliated with the Ohio Department of Natural Resources; people affiliated with environmental organizations; people affiliated with the marine

transportation industry; and members of the general public. One person provided only written comments.

Sixty percent were in favor of some type of physical separation; the remainder wanted steps taken to control ANS but did not provide information on their preferred option. One person discussed a non-structural solution that involved data gathering that could be done by the public and another discussed marine rail/lift systems.

**Ann Arbor, MI, January 21** - Nearly 90 people attended the Ann Arbor meeting from Michigan (76%) and Illinois (4%), including U.S. Senator Debbie Stabenow from Michigan and a representative for U.S. Senator Ron Portman, from Ohio. Eighteen attendees did not report their zip code (20%). Forty-one people participated via webinar and conference call, from Michigan (49%), Ohio, Illinois, Wisconsin, New York, Washington D.C., Indiana, Minnesota, Iowa, Tennessee, Mississippi, and Ontario.

Thirty-five people spoke at the meeting including Senator Stabenow; people affiliated with environmental organizations; people affiliated with the boating industry; and members of the general public. One person provided written comments but did not speak at the meeting.

Nearly 65 percent of commenters spoke in favor of an alternative that involved physical separation; one-third wanted ANS controlled but did not indicate a preferred alternative; one commenter seemed to think it might be too late to stop the Asian carp. No one specifically spoke in favor of keeping the CAWS open for navigation.

**Traverse City, MI, January 23** - Nearly 110 people attended the Traverse City meeting, all from Michigan. Attendees included U.S. Senator Carl Levin, U.S. Senator Debbie Stabenow, State Representative Wayne Schmidt and Michael Estes, Mayor of Traverse City. Representatives for U.S. Representative Dan Benishek and U.S. Senator Carl Levin also attended.

Twenty-eight people spoke at the meeting; two provided written comments only. Speakers included Senator Stabenow, Mayor Estes, Senator Levin, people affiliated with the boating and sports fishing industries, people affiliated with environmental groups, and members of the general public. Nearly 57 percent of the commenters expressed a preference for physical separation; about 36 percent wanted ANS stopped; 7 percent asked questions. No one specifically spoke in favor of an alternative that would keep navigation in the CAWS open.

**Erie, PA, January 24** - Nearly 40 people attended the Erie, Pennsylvania meeting, including a representative for U.S. Senator Bob Casey. All were from Pennsylvania.

Seventeen people spoke at the meeting including staff from the Pennsylvania Department of Environmental Protection, people affiliated with environmental organizations, and members of the general public. Many of the speakers did not have specific comments, but asked questions on a variety of project related topics. Nearly 18 percent of the commenters spoke in favor of some type of physical separation; nearly 53 percent spoke in general about the importance of

controlling ANS. No one spoke specifically in favor of maintaining commercial navigation on the CAWS.

**Twin Cities, MN, January 27** - Approximately 30 people attended the meeting from the states of Minnesota (86%), Mississippi, and Illinois.

Seven people spoke at the meeting and one person submitted written comments. Four commenters were affiliated with environmental organizations and one was associated with marine navigation. Six commenters were in favor of some type of physical separation. One commenter favored a solution that minimizes impacts to navigation and another did not discuss alternatives, but requested that the comment period be extended 60 days.

**St. Louis, MO, January 30** - Nearly 40 people attended the St. Louis meeting from Illinois (63%), Missouri (29%), Iowa, and Mississippi, including a representative from the Illinois Lieutenant Governor's Office.

Thirteen people spoke at the meeting, including people affiliated with environmental organizations or the marine navigation industry and members of the general public. Commenters who expressed an opinion on which option they favored were nearly evenly divided between those who favored some type of physical separation and those who wanted the CAWS to remain open to navigation. Other commenters discussed the commercial opportunities for harvesting carp.

**New Orleans, LA, January 31** - Nearly 30 people attended the New Orleans meeting from Louisiana (80%), Tennessee, Mississippi, Kansas, and Ontario, Canada. Attendees included a representative for U.S. Senator David Vitter and Toby Barrett, member of Parliament from Ontario, Canada. Two participated via webinar and conference call.

Eleven people spoke at the meeting, including a representative for Senator Vitter and the Canadian MP. All other speakers at the meeting were associated with marine navigation in some way. All participants spoke in favor of an alternative that would allow waterborne transportation within the CAWS to continue, with just one exception. The speaker from Ontario advocated physical separation.

**Northwest Indiana, February 11** - Forty-five people attended the meeting in Portage, Indiana, 30 from Indiana and 15 from Illinois. Attendees included representatives for U.S. Senators Joe Donnelly and Dan Coats from Indiana; staff for U.S. Representatives Marlin Stutzman and Pete Visclosky from Indiana; and Indiana Attorney General Greg Zoeller.

Fourteen people spoke at the meeting, including a representative for Representative Visclosky, Indiana Attorney General Greg Zoeller, people affiliated with environmental organizations, people associated with the marine transportation industry and members of the general public. One commenter provided only written comments. The commenters were evenly divided between those who wanted some type of physical separation, those who wanted the CAWS open for navigation, and those who supported efforts to stop ANS, but did not discuss a preferred option.

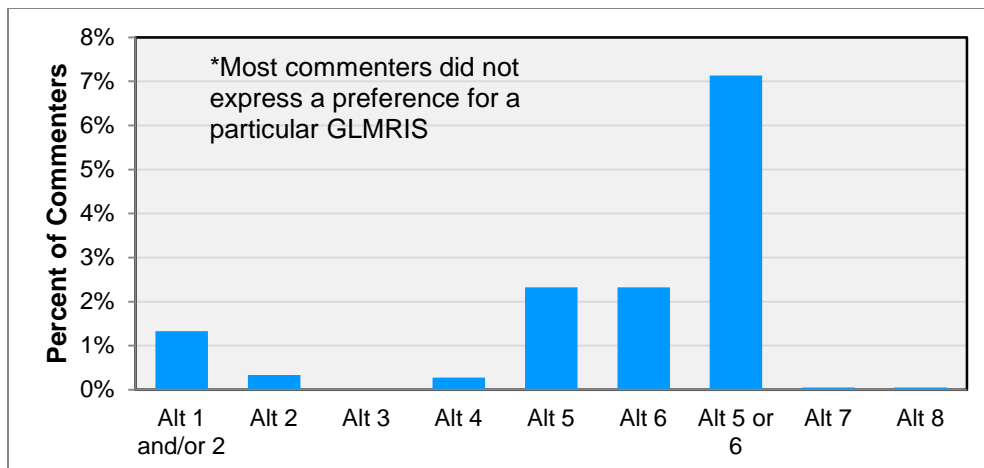
**Buffalo, NY, February 13** - Thirty-five people attended the Buffalo meeting, all from the State of New York, including representatives for U.S. Senator Kirsten Gillibrand, U.S. Representative Brian Higgins, and New York Attorney General Eric Schneiderman, as well as Paul Dyster, Mayor of Niagara Falls.

Six people spoke at the meeting, including the Mayor of Niagara Falls and four people associated with environmental groups. Five speakers were in favor of some form of physical separation. The other commenter did not have a preferred alternative, but wanted nonstructural control technologies to be implemented immediately. No one spoke specifically in favor of keeping the CAWS open for navigation.

### 3 GENERAL COMMENT THEMES

The statistics described in this section do not reflect the Sierra Club and Clean Wisconsin campaigns identified above. Responses to some of the more prevalent issues raised in this chapter are presented in the following chapter, Agency Response.

Over 98% of the commenters expressed support for the need to control ANS: 40% favored an alternative that involved some type of physical separation; 35% wanted an alternative that allowed navigation to continue within the CAWS; and 24% wanted the spread of Asian carp and other ANS stopped, but did not discuss the alternatives. Most of the commenters did not indicate a preference for a specific GLMRIS alternative, as shown in Figure 4. Of those that did, the physical separation alternatives (GLMRIS Alternatives 5 and/or 6) were mentioned most often, as shown in Figure 4. The remaining commenters asked questions but did not offer a specific comment; provided a comment that did not pertain to the GLMRIS report; or felt it was already too late to prevent ANS transfer.



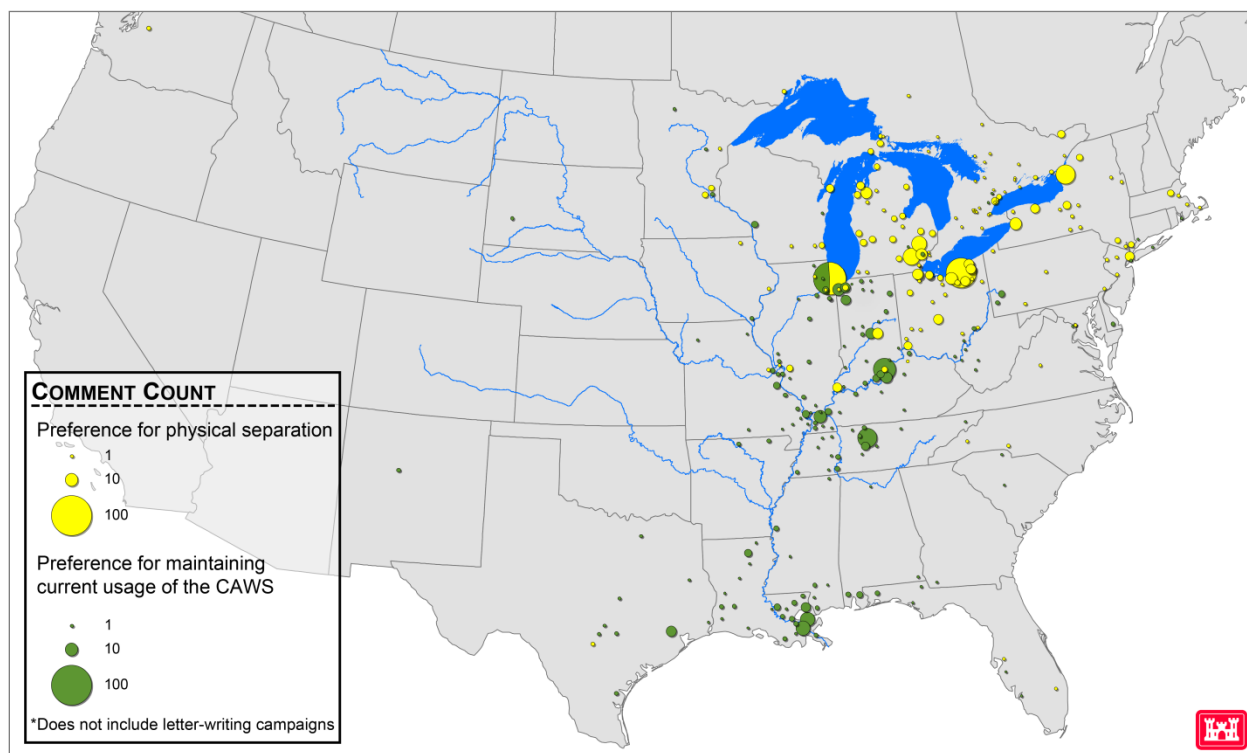
**Figure 4. Specific Interest in GLMRIS Alternatives**

People who favored physical separation talked about how important it was to protect the Great Lakes from Asian carp and other invasive species citing impacts to commercial and



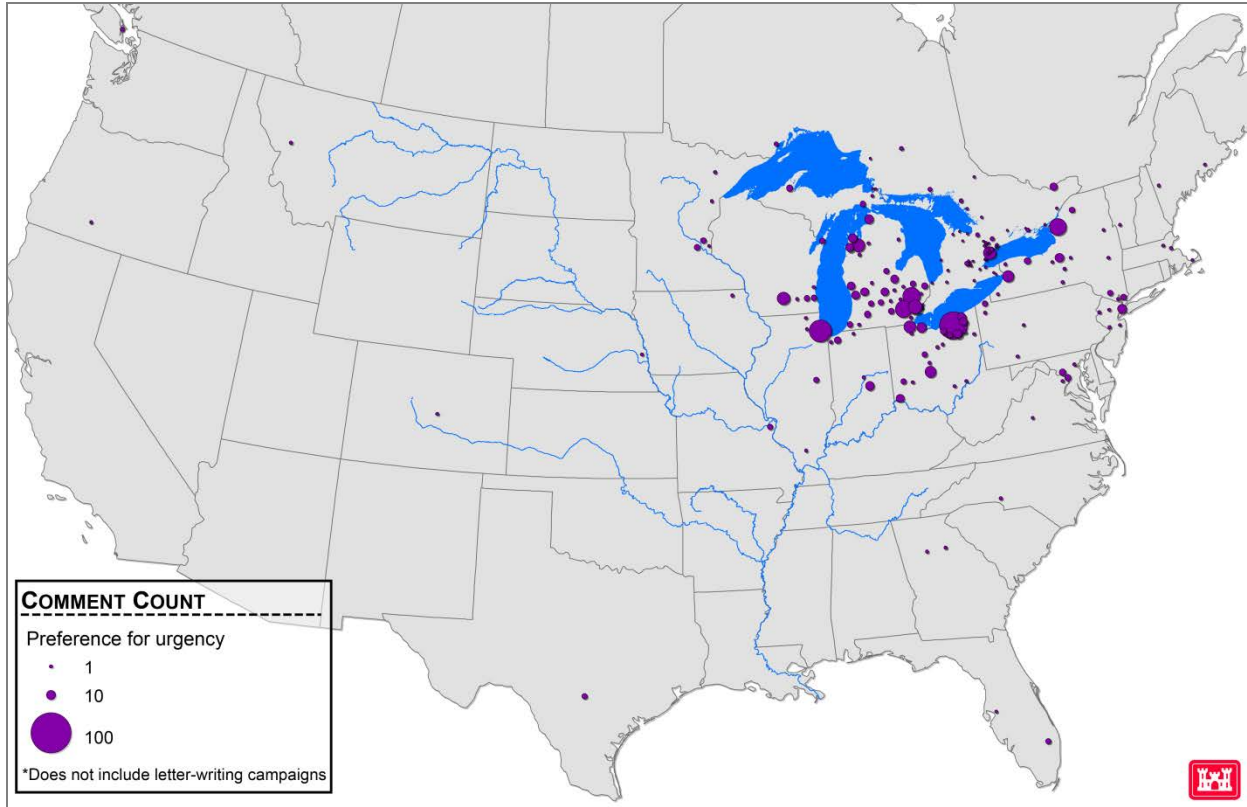
recreational fishing and boating industries; private recreation; and tourism. They also described how important the Great Lakes region was to their way of life and how important it was to preserve it for future generations. Several commenters spoke in favor of “ecological separation,” and appeared to use it interchangeably with physical separation or hydrologic separation. A few commenters utilized the term “ecological separation” in a way that encompassed ANS controls such as biocides and other technologies, in addition to physical barriers.

Commenters who favored solutions that minimize impacts to navigation pointed out that waterborne transportation was safe and fuel-efficient. They talked about its importance to the regional and national economies, the adverse safety and environmental impacts associated with switching cargo to rail or truck transportation, and the costs involved in mitigating these impacts. A few commenters wanted USACE to explore using marine rail/lift systems.



**Figure 5. Geographic Distribution of Comments Identifying Preference for Physical Separation vs. an Alternative that Minimizes Impacts to the CAWS**

Nearly 30 percent of commenters expressed a sense of urgency regarding the timeline, fearing ANS (and Asian carp in particular) would spread before the 25-year timeline was completed. Several commenters expressed support for implementation of interim or short-term measures while a longer-term project is being constructed. Nearly 10 percent felt the control measures were worth the cost, arguing that there is a cost involved with implementing and managing the current control measures and that the costs related to the impacts of ANS should they enter the Great Lakes would be greater than the cost of the alternatives proposed by USACE.



**Figure 6. Geographic Distribution of Comments Expressing a Sense of Urgency**

### 3.1 METHODOLOGY QUESTIONS

Some commenters questioned certain design assumptions made in the GLMRIS Report, including the 500-year (or 0.2 percent chance of exceedance) storm event used to design ANS control and mitigation measures. Several comments claimed that this level of design exceeds the standard typically used for waste water systems and flood protection projects. Some pointed out that flooding in Chicago is a current problem requiring attention, independent of ANS control efforts, and that the mitigation included in the GLMRIS alternatives would provide flood control benefits irrelevant to ANS control.

Some commenters recommended that Lake Michigan be the receiving water for wastewater treatment plants and combined sewer outfalls, and questioned the assumption that significant new pollutant loads to Lake Michigan would violate the Clean Water Act and its antidegradation provisions. For GLMRIS Alternatives 6, 7, and 8, which include physical barriers placed at Mid-System locations, some stated that wastewater treatment plant effluent should be discharged to Lake Michigan, rather than being routed to the river-side of the separation barriers as proposed in the GLMRIS Report. These commenters stated that the O'Brien and Calumet treatment facilities can and should be upgraded to meet Lake Michigan discharge standards. One commenter stated the opinion that the GLMRIS Report did not take into account phosphorus removal improvements currently being pursued by the Metropolitan Water Reclamation District (MWRD).

Some advocates of physical separation recommended that combined sewer overflows (CSOs) be discharged to Lake Michigan. Capturing and treating the "first flush" of combined sewage/stormwater during large storm events and discharging the remaining storm flows to Lake Michigan untreated was also suggested. Another commenter argued that preventing CSO discharge to Lake Michigan by adding storage and treatment provides water quality benefits independent of any harms caused by hydrologic separation, and inappropriately increases the costs of the hydrologic separation alternatives.

Some commenters caution that physical separation would result in the introduction of wastewater, stormwater and contaminated sediments to Lake Michigan and recommend that necessary removal, remediation and capping be performed before redirecting the flow of segments of the CAWS. Several other commenters state that the sediment remediation proposed as mitigation for water quality impacts is irrelevant to physical separation and ANS control, and inappropriately increases the costs of the hydrologic separation alternatives.

The main methodological concern noted was that conservative assumptions led to oversized mitigation projects, exaggerated cost estimates and lengthy implementation schedules. Others raised concerns about the cost estimation methodology, which did not include calculation of a benefit-cost ratio. Some opined that the costs of GLMRIS Alternative 1: No New Federal Action were underestimated, as there are costs associated with continuing current ANS control efforts, and future costs to fisheries, tourism, and other resources if ANS transfer is not prevented. Some concerns were raised with the assessment procedure for determining risk of ANS interbasin transfer. One commenter opined that the "high, medium, low" risk rating system was too imprecise and others believe that more non-native species should have been considered.

### **3.2 TRANSPORTATION COMMENTS**

One commenter stated that the GLMRIS Report overstates the future commercial cargo traffic in the CAWS and therefore overestimates commercial cargo impacts due to mid-system hydrologic separations. Others believe that the report mistakenly assumes transportation impacts caused by mid-system separation cannot be mitigated and recommends that alternatives for moving goods between the two basins under conditions of hydrologic separation be provided.

### **3.3 CLIMATE CHANGE**

Commenters wanted USACE to consider the effects of climate change in their modeling and design analyses, particularly as it relates to increased rainfall, flood risks and recommended mitigation measures. Other commenters noted that increased flooding could increase the potential for Asian carp to enter Lake Michigan. One commenter mentioned that rising water temperatures could increase Asian carp spawning rates.

### **3.4 OTHER PATHWAYS**

Commenters alerted USACE to potential pathways for ANS transfer not specifically addressed in the GLMRIS report. Commenters expressed concerns that construction of a fish passageway for

lake sturgeon, paddlefish, and other native species at the Prairie du Sac dam on the Wisconsin River could pose a new risk for the spread of ANS. Commenters also raised concerns about overflows from Skokie Ditch and a tunnel project proposed by the City of Winnetka, IL to convey storm water—and possibly ANS—from the Mississippi River basin to Lake Michigan. Another commenter pointed out that removing dams could increase the risk of transferring ANS between the basins.

### **3.5 ISSUES WITH PROJECT SCOPE**

Several who commented on the GLMRIS Report were disappointed that the report presented a range of options but did not recommend or select an alternative. Others questioned whether USACE possesses the requisite expertise and experience to respond effectively to invasive species issues. While the GLMRIS study was focused on ANS transfer between the Mississippi River basin and the Great Lakes, some commenters observed that ANS have opportunity to enter the Great Lakes via other pathways, including the St. Lawrence and St. Clair rivers.

### **3.6 POTENTIAL IMPACTS OF ANS CONTROLS**

Commenters cautioned USACE about proceeding without thoroughly investigating potential impacts of their proposed actions. Commenters cited examples of adverse impacts resulting from other projects, such as the closure of the St. Anthony Lock in Minnesota and Dredging the St. Clair River in Michigan.

One organization asked that USACE be mindful of potential impacts to the Chicago River. Other commenters pointed out that using piscicides, pesticides, herbicides, and other organic and inorganic compounds to control the spread of aquatic nuisance species could have negative impacts to water quality, natural habitats, and untargeted species both directly and through bioaccumulation.

Commenters were concerned that GLMRIS-related project and mitigation measures could negatively affect on-going remediation and restoration efforts in Northwest Indiana. They pointed out that the Little Calumet River Basin Commission flood control project and the Grand Calumet River remediation project were not designed to accommodate flow reversal. USACE activities could result in erosion, flooding and/or recontamination of the clean cap material installed as part of the remedial action.

### **3.7 SUGGESTIONS FOR CONTROLLING ANS**

**Public Outreach** - Commenters recommended that USACE continue to educate the public about human-mediated transport of ANS and its prevention (e.g. transporting live carp, dumping bait buckets, failing to inspect and disinfect boats and boating equipment). It was suggested that anglers, boaters, and other recreational water users and organizations be specifically targeted. One commenter suggested that USACE use the members of environmental groups, boaters, and others to observe and report conditions in the Great Lakes and compile the crowd-sourced monitoring data in a web-based database.

**Legislation** - Commenters suggested regulations and legislation that could help control the spread of ANS. These may include: banning the sale, importation and transportation of live invasive species within the U.S. and between the U.S. and Canada; assessing penalties for operator navigation mistakes that damage or interfere with monitoring, cleansing, or other control structures in the locks; regulating boat washing; subsidizing carp harvesting; banning sea-going traffic in the St. Lawrence Seaway; and stricter controls for ballast water.

**Commercial Uses of Carp** - Commenters noted that carp could be harvested for human consumption and processed for animal consumption, fertilizer, and fish oil.

**Biological Controls** - Suggestions for biological control of ANS include: genetically altering the carp so that it cannot reproduce or otherwise interfering with the reproductive cycle; using viruses that only target carp or other invasive species; using biocides as part of the treatment process in the GLMRIS Locks; and introducing native fish and predators to help control the carp and other ANS.

**Other Non-Structural Controls** - Commenters suggested the following means for controlling and monitoring ANS: ultraviolet (UV) light technology; increasing the size and intensity of anoxic zones (for example, suspension of aeration facilities on the canal or bubbling nitrogen gas through the water); use of video monitoring, inspection, and treatment zone for barges; use of chemical biocides; creation of a Great Lakes shipping fleet to carry goods for all foreign vessels; a retrofit of all locks outside the CAWS to function as GLMRIS Locks.

**Modification of the Brandon Road Lock and Dam** - Several commenters wanted the GLMRIS Lock system described in GLMRIS Report to be designed, built, and tested at Brandon Locks as a demonstration project to determine its effectiveness at stopping the transfer of ANS. Commenters urged that this near-term project begin as soon as possible.

### **3.8 PUBLIC ENGAGEMENT PROCESS**

Several people thanked USACE for its work on the GLMRIS Report and for the public meetings held in various cities. Some asked that additional meetings be held; Indiana, New York, Louisiana and Canada were specifically requested. Several requested that the public comment period be extended to allow more time for reviewing the report and drafting comments. Others expressed that insufficient lead time had been provided in advance of the public meeting to review the report and remarked that the meetings could have been better advertised. Only one commenter stated that the meetings were unnecessary and that a webinar would have been sufficient. Several commenters advocated for consideration of impacts to Canada and for collaboration with Canadian organizations, while others advocated for greater outreach efforts to Native American communities. Commenters wanted to know if the public would be able to see all of the comments and how comments would be used in the decision making process. One commenter suggested that the alternatives be presented in such a way that makes the construction timeline easier to understand.

## 4 AGENCY RESPONSE

The GLMRIS Team extends its appreciation to all those who reviewed the GLMRIS Report and shared feedback at public meetings or in writing. The comments submitted reflect passion about preserving valuable natural resources and the vitality of our nation's waterways. Many comments included important observations, suggestions, questions, and criticisms. Project costs and implementation timeframes identified in the GLMRIS Report prompted questions about plan formulation methodology and engineering and policy assumptions. While it is not practicable to address every comment within the scope of this summary report, the following clarifications are offered in response to some of the commonly identified recurring issues.

### 4.1 METHODOLOGY QUESTIONS

The GLMRIS Report identifies eight alternative plans and evaluates the potential of these alternatives to prevent the transfer of aquatic nuisance species (ANS) between the Great Lakes and Mississippi River basins. Five of the eight alternatives identify a 25 year implementation timeline and up to \$18 billion in costs. The costs identified include construction of ANS control measures, construction of mitigation measures, real estate, and annual costs for operations, maintenance, and nonstructural ANS controls. In most cases the cost of the mitigation measures exceeds that of the ANS control measures.

Lake Michigan and the Chicago Area Waterway System (CAWS) currently serve many important uses, including navigation, water supply and conveyance, flood risk management, and recreation, among others. Installation of aquatic nuisance species controls in the waterway can be expected to cause adverse impacts to many of these uses. The GLMRIS study evaluated the effectiveness and the extent of the adverse impacts likely to be caused by each of the eight alternative plans. Based on the findings, additional projects were identified to lessen, or *mitigate* the adverse impacts. Mitigation measures were included to provide a thorough and comprehensive understanding of the total effort needed for an implementable solution.

Our analyses show that physical separation barriers are likely to cause the most severe adverse impacts, particularly to flooding, water quality, and navigation. Technology-based ANS controls were found to cause fewer impacts, and therefore require less mitigation compared to the hydrologic separation alternatives.

Hydrologic and hydraulic (H&H) modeling was conducted to determine how much flooding would result from building separation barriers in the middle of the waterways. The H&H modeling showed that constructing physical separation barriers at the lakefront, as proposed in Alternative Plan 5, imposes a significant risk of flooding to Chicagoland communities, even with the Tunnel and Reservoir Plan (TARP) reservoirs online and available. Separation barriers constructed at mid-system locations, as proposed in Alternative 6, would also result in increased flooding, but considerably less than for the lakefront locations. Flood risk mitigation consisting of tunnels and reservoirs is proposed to prevent damages to homes, businesses, and other structures, resulting from floods caused by the separation barriers. The size of the tunnels and reservoirs needed to contain the floodwaters are so large that their construction makes up the majority of the project cost and implementation timeline, in the case of Alternative Plan 5.

Tunnels and reservoirs were sized to store the volume of water that would typically be backflowed to Lake Michigan during a 500-year flood event. Some commented that separation barriers should only be built to withstand a 100-year storm. This would mean that any storm larger than the 100-year event would create a pathway over or around the separation barriers and allow for ANS transfer during these events. The GLMRIS study adopted a 500-year (or 0.2% chance of exceedance) level of protection to reduce the risk of ANS transfer, even during largest storm events, which are becoming increasingly frequent. Several storms exceeding the 100-year design event have visited Chicago within the last five years.

The GLMRIS Report did not propose tunnels and reservoirs to address existing flood issues. Flood risk mitigation infrastructure was proposed only to prevent flood damages that would be induced by the ANS control measures.

The locations of the separation barriers shown in GLMRIS Alternative 6 were selected to minimize flood impacts and therefore reduce the flood mitigation necessary. Under this Mid-System Separation alternative, treated wastewater and storm water will freely drain both to Lake Michigan and to the Illinois River System, and therefore require very little additional tunnel/reservoir storage to address flooding. This alternative provides benefits to flood risk management, however, continuous draining of Chicago wastewater and storm water to Lake Michigan would supply significant levels of contamination to Lake Michigan over time.

Water quality modeling was conducted to determine what would happen to water quality in Lake Michigan and the CAWS if separation barriers were installed. We found that the Mid-System Separation alternative would produce significant new contaminant loads to Lake Michigan. The water quality modeling accounted for all known improvements to wastewater treatment infrastructure either currently underway or that are planned for the future. The modeling capped phosphorus concentrations in treatment plant effluent at 1 mg/L to account for improvements in phosphorus removal systems at the Metropolitan Water Reclamation District (MWRD) O'Brien and Calumet Water Reclamation Plants (WRPs). Even after considering this planned reduction in effluent concentrations, the modeling showed that phosphorus loads to Lake Michigan could be increased by more than 400 metric tons annually (MTA). Annual nitrogen and chloride loads could also increase by more than 3,700 MTA and 140,000 MTA, respectively. Over-enrichment of nutrients, primarily phosphorus and nitrogen, is known to result in planktonic nuisance algal blooms, toxic algal blooms, nuisance benthic algae, and hypoxia, which degrades habitats and food chains and causes economic and social impacts on beaches, recreation, tourism, fisheries and drinking water. Increased loads of chloride, bacteria, and other contaminants in Lake Michigan are also likely to impact aquatic life, recreation and other beneficial uses.

Based on this analysis of water quality impacts to both the CAWS and Lake Michigan resulting from mid-system separation, the GLMRIS Report proposes extensive water quality mitigation to provide the Mid-System Separation alternative the greatest chance of environmental acceptability and regulatory compliance. Lake Michigan Basin effluent and water quality standards are, in general, much more stringent than standards for the CAWS, as described in 35 Ill. Adm. Code 302. Additionally, the Illinois Pollution Control Board Regulation for Antidegradation restricts actions that would result in the deterioration of water quality in high-quality waters such as Lake Michigan (35 Ill. Adm. Code §§ 302.105, 302.521, 303.443).

“Limit of Treatment Technology” nutrient removal processes are able to achieve effluent concentrations as low as 0.1 mg/L total phosphorus and 3.0 mg/L total nitrogen (Kang et al. 2008). However, even if the O’Brien and Calumet WRPs were upgraded to the limit of technology for nutrient removal, plant effluent would still likely be inconsistent with the Antidegradation standard if discharged to Lake Michigan, due to both short-term and cumulative impacts. In addition to the added nutrient load, dissolved constituents such as chloride and bioaccumulative compounds present in municipal wastewater, which are not removed by conventional physical and biological wastewater treatment processes, would also be inconsistent with the Antidegradation standard if discharged to the Lake Michigan Basin. While many other cities discharge wastewater to Lake Michigan, these cities are much smaller than the City of Chicago, and their discharges were in place before the Clean Water Act was established. The difficulty of upgrading wastewater treatment facilities to Lake Michigan effluent standards was identified in collaboration with state and federal regulatory agencies as well as the owner of the largest treatment facilities. Instead of treatment plant upgrades, tunnels are proposed to relocate the outfalls of two of the nation’s largest wastewater treatment plants back to the Mississippi River basin side of the separation barrier.

Similar issues are at stake with regard to combined sewer overflows (CSOs) and contaminated sediments on the CAWS. Physical barriers constructed at the mid-system locations would direct these pollutant sources toward Lake Michigan, instead of to the Illinois River system where they currently drain. These sources would contribute significant contaminant loads to a high-quality waterway protected by Anti-degradation regulations. Based on our coordination with state and local regulatory agencies, a mid-system separation project is not likely to be implementable without extensive mitigation for impacts to water quality. To this end, the GLMRIS Report proposed tunnels and reservoirs to capture the untreated, combined sewer overflows (CSOs) regularly discharged to the CAWS, and sediment remediation is proposed to prevent mobilization of contaminated sediments to Lake Michigan.

This extensive water quality mitigation makes up the majority of the project cost and implementation time for Alternative Plan 6. While efficiencies may be gained through further study, this is a reasonable estimate of the scope of work necessary to provide an implementable plan.

## **4.2 TRANSPORTATION COMMENTS**

The GLMRIS team evaluated the effects of project alternatives on navigation and regional economics. Physical separation was found to induce an estimated \$211M and \$251M in average annual losses to commercial cargo navigation for the Lakefront and Mid-System Hydrologic Separation alternatives, respectively. Two options were evaluated to mitigate these impacts: a multi-modal facility that would transfer commodities from barge to truck or rail, and transloading facilities that would lift vessels over a physical barrier. Through a survey of commercial waterway operators we found that most commercial shippers would not utilize a multi-modal facility due to additional re-handling costs. Respondents to our survey indicated that under conditions of hydrologic separation, they would either: (1) use another mode of transportation from origin to terminus, rather than re-handle commodities within the CAWS



(e.g., truck or rail), (2) relocate their business, or (3) go out of business. Transloading facilities would also increase the costs of material handling. The docks and shippers surveyed, representing more than 90% of docks and 93% of all tonnage in the CAWS, responded that they would not utilize a transloading facility. Therefore the GLMRIS Report proposes no mitigation for impacts to commercial navigation in these scenarios.

Some commenters stated that the GLMRIS Report mistakenly assumes transportation impacts caused by mid-system separation cannot be mitigated. However, detailed economic analyses of the CAWS show that many of the industries relying on the CAWS operate with little difference between marginal cost and marginal revenue. The additional cost of a transloading facility, a facility to move commodities over a barrier, would make the CAWS and many of the businesses that rely on it non-competitive. During the survey conducted by the University of Tennessee Center for Transportation Research (UTK-CTR), industry was asked if they would transfer around a temporary closure or permanent barrier by unloading from barge to truck or rail and then reloading to barge once past the point of disruption on the CAWS. Almost all docks and shippers (representing over 90% of the docks in the CAWS and 93% of all tonnage) responded they would not undertake this option.

Mitigation with a multimodal facility, a facility that moves bulk commodities from one transportation mode to another, requires further investigation. Potential constraints hindering the implementation of a multimodal facility include the large amounts of land that would be required to handle the variety of commodities moving on the CAWS and the current rail capacity and roadway congestion in the Chicago region. Another factor to consider is that a multimodal facility would force additional handling costs for some of movements.

Some commenters also stated that the GLMRIS Report overstates the future commercial cargo traffic in the CAWS and therefore overestimates commercial cargo impacts due to mid-system hydrologic separation. While historic growth rates are useful in placing the level of CAWS traffic within a context, it was deemed not appropriate for this study to base future Chicago Area Waterway System (CAWS) traffic upon a simple extrapolation of historic waterway trends. Instead, this analysis relied on a more encompassing approach of identifying over 2,200 movements which either originated, terminated or passed through the CAWS, defined as the river reach between Lockport Lock and Chicago River Lock or O'Brien Lock. For each movement, future tonnage was projected based on historical averages, news reports, industry projections, and interviews conducted by University of Tennessee Center for Transportation Research (UTK-CTR) with 90 shippers who accounted for greater than 96% of total tonnage on the CAWS. Forecasting for each CAWS movement allowed the analysis to identify more readily the movements affected by each Aquatic Nuisance Species (ANS) solution.

### **4.3 CLIMATE CHANGE**

Illinois State Water Survey (ISWS) Bulletin 70 rainfall data was used for the hydrologic analyses. Neither ISWS nor the National Oceanic and Atmospheric Association (NOAA) have published new precipitation data for Illinois that considers conditions of climate change. For more discussion please see page E-27 of the GLMRIS Report.

#### **4.4 OTHER PATHWAYS**

The authority that provided the scope and timeline for the GLMRIS Report required the study team to focus on the watersheds of the rivers and tributaries associated with the Chicago Area Waterway System (CAWS). The CAWS is operationally defined by the GLMRIS study team as Focus Area 1.

Focus Area 2 of GLMRIS evaluates potential surface-water connections between the Great Lakes and Mississippi River basins in the states of New York, Pennsylvania, Ohio, Indiana, Wisconsin, and Minnesota. Focus Area 2 encompasses all natural and anthropogenic aquatic surface water pathways and hydrologic connections that exist or may form intermittently between the basins outside of the CAWS. Due to the significant natural variability associated with the hydrology and biology the vast geographic area following the watershed boundary, the Other Aquatic Pathways (Focus Area 2) Team identified available experts from both within USACE as well as from outside sources. Local, state, and federal hydrologists and biologists were engaged to identify and assess conditions at each potential aquatic pathway along the basin divide.

Staff from several USACE Districts as well as from state departments of natural resources, the U.S. Geological Survey, U.S. Fish and Wildlife Service, and National Oceanic and Atmospheric Administration worked collaboratively to complete the Preliminary Risk Characterization in 2010. Following this report and its recommendations, a broader team of aquatic biologists, water resource scientists, and engineers was assembled to complete 18 detailed site investigations and provide input and guidance during the assessments. Further detail is provided in Appendix N of the GLMRIS Report, as well as within the specific pathway assessment reports that are available on the GLMRIS Website at <http://glmris.anl.gov>.

#### **5 CONCLUSION**

As aquatic nuisance species control is a shared responsibility among federal, state, and local agencies, as well as the public, the conversation that has been initiated during the GLMRIS Report comment period is a valuable tool for achieving momentum toward a collaborative path forward.

Over 5,000 interested stakeholders have contributed to this process in some way, either by helping to identify minor errors for correction, adding context to a diversity of viewpoints, or by providing important information to decision-makers regarding perspectives from a regional cross-section of interested parties.

Comments received underscore the complexities inherent in identifying a collaborative path forward toward the strategic control of ANS. While a clear consensus among all interested parties could not be identified, a variety of common themes emerged. A well-organized and passionate voice on behalf of the Great Lakes community communicated a strong and urgent will to continue to protect this natural resource from further damage by aquatic nuisance species. Residents of the states adjacent to the Great Lakes expressed a strong fear of potential harm by

Asian carp intrusion into rivers, streams, and lakes that have not yet been invaded. Stakeholders who have built careers and livelihoods out of plying the nation's waterways for commercial or recreational purposes communicated similarly ardent pleas to maintain the navigability of the Chicago Area waterways, citing the connectivity between watersheds as an unparalleled conduit for recreational opportunity and economic prosperity.

Many stakeholders expressed agreement that ongoing activities toward the continued management and control of existing ANS populations is important, and that further success may be realized by adding incremental resources to these efforts. Some comments identified possible interim activities - including the enhanced implementation of nonstructural measures as well as possible near-term structural risk reduction measures - that could help reduce the probability of transfer for some of the ANS of concern. Others voiced a clear opinion that the most effective method to achieve risk reduction is to physically, permanently separate the watersheds through a structural solution.

## **5.1 USACE PATH FORWARD**

Input obtained from the public, agency partners, and other stakeholders during the comment period will be utilized to help inform future decisions regarding opportunities for further study relating to GLMRIS. However, until a clear consensus can be identified, USACE will await further direction from the Administration or Congress prior to conducting additional study efforts.

USACE will continue to work with federal, state, and local governmental and regulatory agencies as well as with non-governmental stakeholders to participate in collaborative discussions and provide input or technical assistance in advising solutions to control the spread of ANS, as authorities and funding allow. Continued engagement in the conversation on ANS by collaborative organizations will help shape future decisions regarding long-term control strategies. While the Corps has demonstrated expertise in leading the GLMRIS effort, there are many complexities inherent in modifying the array of important existing uses of the Chicago-area waterways, which include but are not limited to navigation, water conveyance and quality, and flood risk management. Implementation of a range of nonstructural or permanent measures would require commensurate resource allocations by those agencies whose responsibilities are germane to their authorities. As such, significant resource investments by other federal agencies and state and local stakeholders would likely be necessary to reach a joint decision on the issue of ANS transfer in the CAWS.

**ATTACHMENT 1**  
**PRESS RELEASE FOR GLMRIS REPORT PUBLIC MEETING**

**ATTACHMENT 2**  
**PUBLIC NOTICE FOR GLMRIS REPORT PUBLIC MEETING**

**ATTACHMENT 3**  
**ORGANIZATIONS PROVIDING COMMENTS**

**ATTACHMENT 4**  
**PUBLIC OFFICIALS PROVIDING COMMENTS**

**ATTACHMENT 1**  
**PRESS RELEASE FOR GLMRIS REPORT PUBLIC MEETING**





U.S. ARMY CORPS OF ENGINEERS

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# NEWS RELEASE

For Immediate Release: Jan. 27, 2014

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## **Corps, White House CEQ to host public meeting on aquatic nuisance species transfer between Mississippi River, Great Lakes**

**NEW ORLEANS** - The U.S. Army Corps of Engineers and the White House Council on Environmental Quality are hosting a public meeting in New Orleans and a webinar Jan. 31, 2014, from 4 - 7 p.m. to discuss the Great Lakes and Mississippi River Interbasin Study (GLMRIS) Report that was submitted to Congress Jan. 6, 2014, and to allow for public comment. The report presents a range of options and technologies- to include hydrologic separation- available to prevent the spread of aquatic nuisance species (ANS) between the Great Lakes and Mississippi River basins through aquatic connections.

### **Meeting info:**

U.S. Army Corps of Engineers  
District Assembly Room A  
7400 Leake Ave  
New Orleans, LA 70118

### **Webinar details:**

Go to <http://emsp.intellor.com/login/414432> up to 10 minutes prior to the start of the meeting.

Web Access ID: lkjdf980732kj4h

After you have connected your computer, audio connection instructions will be presented.

A presentation on the report will begin promptly at 4 p.m and will be followed by an oral comment period. To view the report and details on the public meeting and webinar or to register to speak, visit <http://glmr.is.anl.gov/glmris-report/>. Comments will be accepted for the administrative record until March 31, 2014.

-more-

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U.S. Army Corps of Engineers, Chicago District 231 S. LaSalle St., Ste. 1500 Chicago, IL. 60604

<http://www.lrc.usace.army.mil/> and <http://www.glmris.anl.gov>

GLMRIS: Find us on Facebook at <http://www.facebook.com/glmris> and on Twitter at <http://twitter.com/glmris>

Chicago District: Find us on Facebook at <http://www.facebook.com/usacechicago> on Flickr at

<http://www.flickr.com/photos/usacechicago> and YouTube at <http://www.youtube.com/chicagousace>

“This report is unique because it identifies a range of options, allows for the incorporation of future technologies, and presents courses of action that may be implemented now to reduce short-term risk,” said Corps Great Lakes and Ohio River Division Commander Brig. Gen. Margaret W. Burcham. “ANS prevention is a shared responsibility, and continued engagement will be an essential next step to try to identify and build consensus toward a collaborative path forward.”

The report identifies eight potential alternatives - from continuing current efforts to complete separation of the watersheds - and evaluates the potential of these alternatives to control the inter-basin spread of 13 aquatic nuisance fish, algae, virus, crustaceans and plants in all life stages with high or medium risk for transfer. There are 10 species of concern poised to transfer from the Great Lakes to the Mississippi River, such as ruffe.

The options concentrate on the Chicago Area Waterway System (CAWS). The CAWS is a complex, multi-use waterway and is the primary direct, continuous inter-basin connection between the Mississippi River Basin and Lake Michigan. The report provides a description of various evaluation criteria (like estimated cost, mitigation and timeline information) that can be used by stakeholders to compare plans. However, this report is not a decision document and does not rank, rate or make a recommendation.

###

**ATTACHMENT 2**  
**PUBLIC NOTICE FOR GLMRIS REPORT PUBLIC MEETING**



**U.S. Army Corps of Engineers, White House CEQ  
to host public meeting in Portage, IN on Feb. 11, 2014**

On Tuesday, Feb. 11, 2014, the U.S. Army Corps of Engineers (USACE) is hosting a public meeting to present information on the Great Lakes and Mississippi River Interbasin Study (GLMRIS) Report released Jan. 6, 2014. The meeting will be held at the Northwest Indiana Planning Commission Auditorium located at 6100 Southport Road, Portage, In. from 4-7 p.m.

The meeting will begin with a presentation on the report. The public is invited to attend and provide comments on and ask questions pertaining to the alternatives in the report. The GLMRIS Report presents a range of options and technologies that could be applied to prevent aquatic nuisance species (ANS), such as Asian carp, transfer between the Great Lakes and Mississippi River basins through aquatic connections. The report is available for public review on the GLMRIS website at <http://glmr-is.anl.gov>.

If you plan to make an oral comment, please register on the GLMRIS website.

For additional information, including other public meeting locations, or to submit an electronic comment, please visit <http://glmr-is.anl.gov>. The public comment period will end March 31, 2014.

**ATTACHMENT 3**  
**ORGANIZATIONS PROVIDING COMMENTS**

## **Organizations Providing Comments on the GLMRIS Report**

Adopt a Walleye West Michigan  
Alcona Conservation District  
Algonac water filtration plant  
Alliance for the Great Lakes  
Alliant Energy Corp./Wisconsin Power and Light Com  
American Commercial Lines  
American Fisheries Society Ontario Chapter  
American Great Lakes Ports Association  
American Heartland Fish Products  
American Rivers  
American Waterways Operators  
Andrie Inc  
Atlantium Technologies  
Attorney General of Indiana  
Attorney General of Michigan  
Attorney General of Ohio  
Bad River Youth Outdoors  
Bay of Islands Community Assoc., Ontario, Canada  
Bayfield Nares Islanders Association  
Benzie County  
Best Way Express, Inc  
Big River Coalition  
Blessey Marine Services, Inc.  
Bluestone Heights  
Bos Dairy, LLC  
Brennan Marine, Inc  
Calf Land, LLC  
Calumet River Fleeting Inc.  
Campbell Transportation Company, Inc.  
Canada Friends of the Green Bay Trail  
Canadian Federation of University Women  
Canal Barge Co.  
Canal Barge Company, Inc.  
Canal Barge Inc.  
Celtic Marine Corporation  
Chagrin River Yacht Club  
Chester inc.  
Chicago Public Schools  
Chicago South Shore & South Bend Railroad  
Chicago Water Taxi  
Chimney Corners Resort  
Chippewa Ottawa Resource Authority  
CICI

Citizens Campaign for the Environment  
Citizens Concerned for Michipicoten Bay  
Citizens Environment Alliance  
City Commissioner and Mayor Pro-tem – City of Traverse City, MI  
City Councillor- Sault Ste. Marie, On  
City of Niagara Falls  
Clean Water Action  
Clean Wisconsin  
Cleveland Metroparks  
Cognashene Cottagers' Association  
Come Sail Away Charters, LLC  
Committee on the Middle Fork Vermilion River  
Conexus Indiana  
Conexus North Central Regional Logistics Council  
Conexus of Indiana  
Conexus/NWIRLC  
ContainerPort Group Inc.  
CRCST & CTSC  
CROP Plus  
DeLoach Marine Services  
DePaul University  
Downriver Bass Association  
DTC  
Ducks Unlimited - Great Lakes/Atlantic Region  
Eastside Dairy, LLC  
Ecologos  
Edward Yandek LLC  
Eli Lilly and Company  
Environment Committee of Homer Glen  
Environmental Defence  
Federation of Ontario Cottagers'  
Fish 'N' Grin Charter Service  
Flint Steelheaders  
FLOW (For Love of Water)  
For Goodness Sake Productions  
Freshwater Future  
Friends of East Lake (Prince Edward County)  
Friends of Michigan Animals Rescue  
Friends of the Chicago River  
Friends of the Detroit River  
Friends of the Earth  
Full Circle Shipyard  
Gavilon  
GBA

Georgian Bay Association  
Georgian Bay Association  
Governor of Indiana  
Grand Haven Charter Boat Association  
Grand Rapids Steelheaders  
Grand Traverse Area Sport Fishing Association  
Great Lakes and St. Lawrence Cities Initiative  
Great Lakes Boating Federation  
Great Lakes Commission  
Great Lakes Legislative Caucus  
Great Lakes Sports Fishing Council  
Grey Association for Better Planning  
Gulf Intercoastal Canal Association  
Gulf Operations, American Commercial Lines  
Hanson Material Service  
Harbor View Yacht Club  
Hawthorne Scholastic Academy  
Healing Our Waters  
Herrema Dairy, LLC  
Hidden View Dairy, LLC  
Holcim  
Holy Spirit Missionary Sisters  
Hoosier Environmental Council  
Howard Hanna Real Estate  
HP Products Corp  
Hughes Bros., Inc.  
IBCO  
Illinois Chamber of Commerce  
Illinois Department of Natural Resources  
Illinois Farm Bureau  
Illinois International Port District  
Illinois Marine Towing, Inc.  
Indiana Department of Environmental Management  
Indiana Department of Natural Resources  
Indiana Economic Development Corporation  
Infrastructure Council of the Illinois Chamber of  
Ingram Barge Company  
Inland Marine  
Inland River Industry  
Inland Seas Association in Suttons Bay  
Inland Towing Industry  
Inland Waterway Navigation Industry  
Integrated Distribution Services, Inc  
Inter-Lake Yachting Association



International Shipmaster Association, Lodge 3  
International Shipmasters Association  
International Shipmasters Association, Chicago Lodge  
Izaak Walton League of America  
J&J Concessions  
Jeffboat LLC / Div. of American Commercial Lines  
JF Brennan  
Kalamazoo River Cleanup Coalition  
Kathryn R. Wilkins Medicine Professional Corporation  
Key River Area Association  
Kindra Lake Towing  
Kingston Field Naturalists  
Lake Erie Improvement Assn.  
Lake Erie Shores & Islands West  
Lake Erie Sport Fisherman, Inc.  
Lake Erie Water Keepers  
Lake Erie Waterkeeper  
Lake Erie Watershed Protection Alliance  
Lake Huron Centre for Coastal Conservation  
Lake Michigan Citizens Advisory Committee  
Lake Michigan League of Women Voters  
Langham Logistics  
Law Offices of Stuart P. Krauskopf  
League of Women Voters  
League of Women Voters of Illinois  
League of Women Voters of Michigan  
League of Women Voters of Wisconsin  
LeBeouf Bros. Towing, LLC  
Leelanau Conservancy  
Les Cheneaux Watershed Council  
Limitless  
Little Travers Bay Bands of Odawa Indians  
Marbach, Brady & Weaver  
Marshall County Economic Development Corporation  
McCammon Trucking, Inc.  
McGregor Bay Assoc.  
McMaster University  
MD Logistics  
Medina County Park District  
Merchandise Warehouse Co., Inc.  
Metro West Steelheaders  
Metropolitan Water Reclamation District of Greater Chicago  
Michigan Audubon Society, Inc.  
Michigan Boating Industries Association

Michigan Charter Boat Association  
Michigan Conservancy  
Michigan Department of Agriculture and Rural Development  
Michigan Department of Environmental Quality  
Michigan Department of Natural Resources  
Michigan Dept of Attorney General  
Michigan DNR, DEQ, DARD, OGL  
Michigan Environmental Council  
Michigan Lakes and Streams  
Michigan League of Conservation Voters  
Michigan Sea Grant Extension Program  
Michigan Steelhead & Salmon Fishermen's Assn.  
Michigan United Conservation Clubs  
MICRA  
Middle River Marine  
Midwest Environmental Advocates, Inc.  
Milwaukee River Keeper  
Milwaukee Riverkeeper  
Minnesota Department of Natural Resources  
Minnesota Pollution Control Agency  
Mississippi Marine Corp  
Mississippi Marine Corporation  
Moline Club  
MSSFA  
Mulzer Crushed Stone  
National Boating Federation  
National Wildlife Federation  
Natural Resource Management Associates  
Natural Resources Defense Council  
Nature Abounds  
Nature Conservancy  
Nature Conservancy in Ohio  
Nature Conservancy, Indiana Chapter  
Northwest Indiana Forum  
Northwest Indiana Steelheaders; Great Lakes Fishery Commission  
Oakland University  
Oberlin College  
Ohio Chapter of the Sierra Club  
Ohio Department of Natural Resources  
Ohio Environmental Council  
Ohio Lakefront Group  
Ohio Sea Grant and Stone Lab, Ohio State University  
Ojibway Defence  
Ontario Federation of Anglers and Hunters (OFAH)

Ontario Rivers Alliance  
Ontario Shorewalk Association  
OPP  
Ottawa County Visitors Bureau  
Owen Sound Field Naturalists  
Ozinga Materials, Inc.  
PABIA  
Passenger Vessel Association  
Pennsylvania Department of Environmental Protection  
Pennsylvania Fish and Boat Commission  
Pennsylvania Sea Grant Program  
Peoria County, IL  
Perry County Port Authority  
peterfleming. inc  
Pickerel-Crooked Lakes Association  
Ports of Indiana  
Prairie Rivers Network  
President, Belstra Milling Co.  
President, Sans Souci Copperhead Association  
Professional Marine Services  
Pt. Au Baril Islanders  
Quinte Conservation  
Radius Indiana  
Ralbet Enterprises Inc.  
Red Gold  
Regional Sustainability and Community Coordinator Mountain Equipment  
Religious Coalition for the Great Lakes  
Rescue Lake Simcoe Coalition  
Restore Our Water International  
RestoreDoor EcoLogical Services  
River Alliance of Wisconsin  
Rocky River watershed  
S H Bell Company Warehousing Chicago IL  
Save the Dunes  
Save the Oak Ridges Moraine Coalition  
Save The River  
SCF Marine  
SH Bell Co.  
Shireman Construction  
Sierra Club  
Sierra Club, Binational Great Lakes Committee  
Sierra Club, Great Lakes Program  
Sierra Club, Illinois Chapter  
Sierra Club, John Muir Chapter

Sierra Club, Missouri Chapter  
Sierra Club, Ohio Chapter  
Skidmore Owings & Merrill  
South Channel Assoc. Georgian Bay  
SSS Consultants  
St. Joseph County Chamber of Commerce  
St. Louis River Alliance  
Steel Dynamics, Inc.  
Steel Warehouse  
Swampfoot  
Team Services, LLC  
Thousand Islands Land Trust  
Tip of the Mitt Watershed Council  
Toronto Green Community  
Town & Country Paving, Inc.  
Town and Country Resource Conservation and Development  
Town of Espanola  
TPG Marine Enterprises LLC  
Trout Unlimited  
Turn Services, LLC  
United States Steel Corporation  
University of Toledo  
Upper Mississippi River Basin Association  
Upper Mississippi Waterway Association  
Upper River Services  
Upper St. Lawrence Riverkeeper  
UPS  
Village of Kenilworth  
W.S.W Industrial Maintenance  
Wabash River Heritage Corridor  
Watershed Technologies Inc  
Wendella Boats  
Wendella Sightseeing Boats Inc.  
West Carling Association  
West Michigan Walleye Club  
Western Reserve Land Conservancy  
White Lake Area Chamber Of Commerce  
White Lake Association, Whitehall MI  
Wild Dog Tackle and Good Guyde Service  
Windy Ridge Dairy, LLC  
Wisconsin Department of Natural Resources  
Wisconsin Great Lakes Coalition (WGLC)  
Wisconsin Power and Light Company  
Woods Bay Community Association

Woods Bay Cottagers Association  
Wordcraft & Graphics Unlimited  
WorkOne Southwest  
[www.stonehenge-put-in-bay.com](http://www.stonehenge-put-in-bay.com)

**ATTACHMENT 4**  
**PUBLIC OFFICIALS PROVIDING COMMENTS**

## **Elected Officials Providing Comments on the GLMRIS Report**

### **Illinois**

Sheila Simon, State of Illinois Lt. Governor, IL  
Marc Ayers, Office of the Lt. Governor, IL  
Laura Fine, State House of Representatives, IL  
Robyn Gabel, State House of Representatives, IL  
Elaine Nekritz, State House of Representatives, IL  
Cheri Bustos, U.S. House of Representatives, IL  
Rodney Davis, U.S. House of Representatives, IL  
William Enyart, U.S. House of Representatives, IL  
Randy Hultgren, U.S. House of Representatives, IL  
Adam Kinzinger, U.S. House of Representatives, IL  
Dan Lipinski, U.S. House of Representatives, IL  
Peter Roskam, U.S. House of Representatives, IL  
Aaron Schock, U.S. House of Representatives, IL  
John Shimkus, U.S. House of Representatives, IL  
Mark Kirk, U.S. Senate, IL

### **Indiana**

Greg Zoeller, Attorney General of Indiana  
Earl Harris, State House of Representatives, IN  
David Niezgodski, State House of Representatives, IN  
Susan Brooks, U.S. House of Representatives, IN  
Larry Bucshon, U.S. House of Representatives, IN  
Andre Carson, U.S. House of Representatives, IN  
Elizabeth Johnson, U.S. House of Representatives, IN  
Luke Messer, U.S. House of Representatives, IN  
Todd Rokita, U.S. House of Representatives, IN  
Marlin Stutzman, U.S. House of Representatives, IN  
Representative Peter Visclosky, U.S. House of Representatives, IN  
Jackie Walorski, U.S. House of Representatives, IN  
Todd Young, U.S. House of Representatives, IN  
Dan Coats, U.S. Senate, IN

### **Louisiana**

David Doss, U.S. House of Representatives, LA

### **Michigan**

Bill Schuette, Attorney General of Michigan  
Jim Carruthers, City Commissioner and Mayor Pro-tem – City of Traverse City, MI  
Michael Estes, Mayor of Traverse City, MI  
Robert Reichel, Michigan Dept of Attorney General  
Terry Brown, State House of Representatives, MI  
Marcia Hovey-Wright, State House of Representatives, MI

Eileen Kowall, State House of Representatives, MI  
Al Pscholka, State House of Representatives, MI  
Sarah Roberts, State House of Representatives, MI  
Wayne Schmidt, State House of Representatives, MI  
Darwin Booher, State Senate, MI  
Bruce Caswell, State Senate, MI  
Geoff Hansen, State Senate, MI  
Hoon-Yung Hopgood, State Senate, MI  
Carl Levin, U.S. Senate, MI  
Debbie Stabenow, U.S. Senate, MI

### Minnesota

Christine Eaton, State Senate, MN  
Sandra Pappas, State Senate, MN  
Robert Reinert, State Senate, MN  
Ann Rest, State Senate, MN  
David Senjem, State Senate, MN  
Charles Wiger, State Senate, MN

### New York

Paul Dyster, Mayor of Niagara Falls, NY  
George Maziarz, State Senate, NY

### Ohio

Mike DeWine, Attorney General of Ohio  
Robert Hagan, State House of Representatives, OH  
Dan Ramos, State House of Representatives, OH  
Marcy Kaptur, U.S. House of Representatives, OH

### Pennsylvania

Greg Lucas, State House of Representatives, PA  
Curtis Sonney, State House of Representatives, PA

### Wisconsin

Eric Genrich, State House of Representatives, WI  
Cory Mason, State House of Representatives, WI  
Tod Ohnstad, State House of Representatives, WI  
Melissa Sargent, State House of Representatives, WI  
Penny Schaber, State House of Representatives, WI

### Canada

Frank Fata, City Councillor- Sault Ste. Marie, Canada  
Toby Barrett, Member of Parliament, Ontario, Canada  
Toby Barrett, Member of Parliament, Ontario, Canada