

Comments on GLMRIS Study Plan
Thom Cmar, Natural Resources Defense Council
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- Good afternoon – my name is Thom Cmar and I am an attorney at the Natural Resources Defense Council in Chicago. Thank you for the opportunity to comment today on your critical efforts to prevent invasive species from moving between the Great Lakes and Mississippi River watersheds.
- It is NRDC's belief that we need to move beyond areas of conflict and come together as a region to develop a permanent solution to the problem not just of Asian carp getting into the Great Lakes, but to the longer-term issue of the Chicago waterway system functioning as a two-way highway for invasive species moving in both directions. We need to separate the two basins permanently, as quickly as possible. Separation is the only reliable solution that will achieve close to 100% prevention of invasive species transfers through the Chicago waterway system.
- In October, NRDC released a report entitled "Re-Envisioning the Chicago River," in which we worked with engineers at the Shaw Environmental firm to identify the hydrological and water quality issues that would need to be addressed to create a permanent separation in the Chicago waterway system.
- Our report found that separating the two basins doesn't require a magic bullet; it can be done with off-the-shelf technology, and done relatively quickly. The only thing we're missing is the political will.
- NRDC will be submitting the technical report on hydrological separation prepared by Shaw Environmental, as well as additional written comments, during the public comment period on the study plan.
- We are here today because Congress mandated the Army Corps in 2007 to study how to prevent these invasive species transfers, which cost the regional economy hundreds of millions of dollars every year, and have had a devastating impact on the ecology of the Great Lakes.
- We cannot afford to let another harmful species invade Lake Michigan. In September, the National Oceanic and Atmospheric Administration released new research showing that zebra and quagga mussels alone have caused unprecedented changes to Lake Michigan, reducing phytoplankton populations over 80% in the last 25 years. If bighead and silver Asian carp are allowed to establish a reproducing population in the Lake Michigan, it could further push Lake Michigan and the entire Great Lakes system to the brink of ecological disaster.
- It has been over a year since Asian carp DNA were first detected in the Chicago waterway system. It is remarkable that only now are you releasing a plan to do a study that was first directed in 2007, and you continue to say – as you have been saying for the last year – that you think it will take you over 5 years just to complete this initial study. We cannot afford to wait that long. At a minimum, the Chicago portion of the study needs to be expedited and completed as soon as possible. We need these answers on the order of 18 months, at least, not 5 years.
- As you will hear from other speakers today, we are deeply concerned about how you have framed the congressional mandate for the study in your study plan. You

say that you plan to look at the feasibility of measures “that could be applied to prevent or reduce the risk of ANS transfer between Great Lakes and Mississippi River basins” – even though the legislation directing you to do the study only says that the study should look at measures to “prevent the spread of aquatic nuisance species.”

- This “reduce risk” language – which seems to have been pulled out of thin air – potentially opens the door to the Army Corps studying all sorts of half-measures that won’t actually prevent the spread of invasive species. It would also likely take longer and be more expensive than the study that Congress authorized. We strongly urge you to correct this language and conform it to your congressional mandate *before* you proceed any further with the GLMRIS study.
- Thank you for the opportunity to comment today.