



*American Fisheries Society*  
Wisconsin Chapter

February 18, 2010

Major General John W. Peabody  
Commander  
U.S. Army Corps of Engineers  
Great Lakes and Ohio River Division  
550 Main Street, Room 10032  
Cincinnati, Ohio 45202-3222

Dear MG John W. Peabody:

On behalf of the Wisconsin Chapter of the American Fisheries Society (AFS), we appreciate your efforts to control the Asian Carp and protect the Great Lakes ecosystem by preventing the establishment of these fish in the system. After reviewing the February 2010 draft of the Asian Carp Control Strategy Framework and participating in the Asian Carp Regional Coordinating Committee's public meeting held on February 12, 2010, we provide the following comments related to the proposed Asian carp control efforts.

As you are aware and have identified in the Asian Carp Control Strategy Framework:

- "Experience has shown that controlling populations of AIS, once established in the Great Lakes, is far more expensive and difficult than preventing their entry to the Great Lakes in the First Place." (Page 1)
- "Following introduction of Asian carp into the Great Lakes basin, controlling their spread throughout these areas would be nearly impossible." (Page 5)
- "A 2002 workshop convened by the Great Lakes Protection Fund as well as the 2003 Aquatic Invasive Species Summit convened by Chicago Mayor Richard Daley and the U.S. Fish and Wildlife Service determined that introduction of Asian carp into the Great Lakes ecosystem would threaten the sport and commercial fisheries, and could result in ecological and economic damages exceeding those caused by the sea lamprey and zebra mussel invasion." (Page 5)

The Wisconsin Chapter of AFS agrees that once AIS are established in the Great Lakes they are nearly impossible to control. Therefore, the only long-term viable option to preserve the ecology of the Great Lakes and Mississippi River systems (science based) is to sever the linkage between the Great Lakes and the Mississippi River basin to ensure that aquatic invasive species are not allowed to expand their populations into either of these Nationally significant waters.

Further the Wisconsin Chapter of AFS suggests that the separation of the Great Lakes system and the Mississippi River basin is likely to be the only long-term, fiscally affordable (economically sound) policy.

To this end we recommended that the long-term goal outlined in the draft Strategy report be revised to provide for full ecological separation of these waterways at this “Critical Control Point” (CSSC on page 4). Experience with other species has clearly shown the need to immediately pursue this goal concurrent with study of additional actions to control Asian carps.

We understand that the Chicago and Sanitary Ship Canal (CSSC) is intimately linked with the lives and livelihoods of the Chicago metropolitan area in terms of economics as well as public health and safety issues such as flooding, stormwater, and wastewater treatment. Therefore, we recommend that the following short-term goals be addressed in order to achieve the ultimate long-term goal of ecological separation of the CSSC from the Great Lakes:

- Develop and implement plans with the Metropolitan Water Reclamation District (MWRD) to expand the deep tunnel or reservoir capacity and other measures necessary to control flooding to allow for the permanent closure of the lock and sluice gates along the Chicago Area Waterway System (CAWS). These elements would include measures to prevent Asian carp from crossing over the locks and sluice gates, dams, and/or pumping stations during flooding events.
- Develop and implement plans with the Metropolitan Water Reclamation District (MWRD) to address necessary operating and construction changes to address stormwater and wastewater treatment plant improvements to allow for the permanent closure of the lock and sluice gates along the CAWS.
- Develop and implement plans to reroute shipping commerce to mitigate the economic impacts associated with the closure of the lock and sluice gates along the CAWS. These actions should be geared towards preservation of jobs and businesses and infrastructure to protect the local economy. In addition, these plans should include elements such as expanding fleeting areas for barges, regulations, tourism, transportation safety and security, among others as necessary.

Of the many proposed studies set forth in Chapter 2 of the Strategy report, the Wisconsin Chapter of AFS is especially disturbed by the suggestion that toxic kill zones be created by using plant effluent (section 2.2.12, page 29) to increase ammonia concentrations and decrease dissolved oxygen concentrations to lethal levels. This approach is non-selective and more toxic to desirable native species that lack the ability to use atmospheric oxygen than the Asian carp. Recall that Asian carps were brought into the U.S. in part to improve water quality in highly eutrophic waters. In addition, this approach could exacerbate the expanding “dead zone” in the Gulf of Mexico. Further, the reduction in level of effluent treatment has the potential to offset many of the environmental gains achieved at great cost since the 1970s. While proposals such as

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this demonstrate a non-traditional approach to managing invasive species they fail to address the primary risk associated with the movement of Asian carp into the CSSC namely to sever the link between the Mississippi River and Great Lakes.

The Corps of Engineers has been provided a tremendous opportunity to serve the interests of the navigation community, the civil engineering needs of Chicago and the environmental protection of the Great Lakes. The eDNA results, while difficult to interpret in terms of the potential for Asian carps to establish a self-sustaining population in the Great Lakes in the near term, certainly underscores the needs to move towards the long-term goal of ecological separation with all due diligence. Short-term actions such as lock closure and additional barriers buy time but fall far short of a permanent solution. We need the Corps to identify, design and implement a solution that addresses the needs of the navigation industry and the storm and waste water conveyance in the Chicago region as well as the environmental protection of the Great Lakes and Mississippi River drainage basins.

Therefore, the Wisconsin Chapter of AFS strongly recommends that the open aquatic link between the Mississippi River basin and Great Lakes ecosystem be eliminated. The Wisconsin Chapter of the AFS through its Environmental Issues Committee would be willing to comment further as this draft framework is developed.

Sincerely,



Dr. Thomas M. Slawski, Chair  
Environmental Issues Committee  
Wisconsin Chapter of the American Fisheries Society  
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cc: Rep. Judy Biggert, 13<sup>th</sup> District of Illinois  
Patrick Carey, City of Chicago  
Jo-Ellen Darcy, Assistant Secretary of the Army (Civil Works)  
Cameron Davis, US Environmental Protection Agency  
Chris Goddard, Great Lakes Fishery Commission  
Gary Gulezian, US Environmental Protection Agency  
Dick Lanyon, Metropolitan Water Reclamation District  
Adm. Peter Neffinger, US Coast Guard  
John Rogner, Illinois Department of Natural Resources  
Rep. Louise Slaughter, Co-chair of the Congressional Great Lakes Task Force  
Charlie Wooly, US Fish and Wildlife Service