



Upper  
Mississippi River  
Basin Association

ILLINOIS, IOWA, MINNESOTA, MISSOURI, WISCONSIN

March 30, 2011

Colonel Vincent V. Quarles  
Commander, Chicago District  
U.S. Army Corps of Engineers  
111 North Canal Street  
Chicago, Illinois 60606

Dear Colonel Quarles:

On behalf of the Upper Mississippi River Basin Association (UMRBA), I am writing to offer comments from our five member states regarding the Great Lakes and Mississippi River Interbasin Study (GLMRIS) scoping effort. Please understand that these comments are supplemental to any comments that our states may submit individually.

Formed by the Governors of Illinois, Iowa, Minnesota, Missouri, and Wisconsin in 1981, UMRBA represents its member states' common water resource interests and works collaboratively with both state and federal agencies that have management responsibilities on the Upper Mississippi River System (UMRS). UMRBA's member states have a vital interest in protecting and enhancing the river system's tremendous regional and national benefits, including those related to commercial navigation, natural resources, water supply, and recreation. And, of course, three of our member states are also partially within the Great Lakes Basin. As such, we certainly understand the need to address the threats posed by aquatic nuisance species (ANS), which have already caused considerable economic and ecological damage in both basins. We look forward to working with the U.S. Army Corps of Engineers (USACE) and other study participants to ensure that GLMRIS fully considers both basins in identifying and evaluating alternatives to reduce the risk of interbasin ANS transfer.

As USACE completes its GLMRIS scoping effort, UMRBA's five member states offer the following specific comments for consideration:

1. *Address Multiple Pathways and Species* — While the overwhelming public focus is undoubtedly on Asian carp in the Chicago Area Waterway System (CAWS), GLMRIS must consider a wider range of pathways and species if it is to meet its Congressional mandate. In this regard, we are pleased that USACE has already completed a preliminary risk characterization for other potential aquatic pathways throughout the border area between the two basins. And we are also pleased to see explicit recognition of ANS other than carp within the initial study scope presented to the public.

415 Hamm Building  
408 St. Peter Street  
St. Paul, Minnesota 55102  
Phone: 651 224 2880  
Fax: 651 223 5815  
[www.umbra.org](http://www.umbra.org)

2. *Evaluate Impacts and Efficacy* — Some of the prevention options under discussion, particularly for the CAWS, could have profound implications for water resources management in both basins, including commercial navigation, water supply, water quality, flood control, and recreation. It is imperative for GLMRIS to identify and examine all significant impacts associated with the alternatives evaluated, including existing measures, and consider these impacts against the alternatives' likely efficacy in preventing interbasin ANS transfer. For at least some types of ANS, non-aquatic pathways also pose a meaningful risk for interbasin transfer, but are beyond the study's Congressional authorization. It will be important for USACE to address, at least conceptually, this residual risk when evaluating alternatives to prevent aquatic transfer.
3. *Invest in Viable Controls* — We understand that GLMRIS was authorized to evaluate options for preventing interbasin ANS transfer. However, we would be remiss if we did not emphasize the equally important task of developing physical, chemical, and biological controls for ANS that are effective, affordable, and safe. The Great Lakes and Mississippi River Basins are each already infested with a range of ANS, several of which have triggered significant economic and ecological consequences. And, by virtue of their vital connections to international shipping and a host of other pathways, both the Great Lakes and Mississippi River Basins will remain vulnerable to new ANS introductions regardless of any success we may have in preventing transfer between the two basins. Thus, the importance of improving control technologies cannot be overstated, and we call on the Administration and Congress to maintain and extend the federal government's role in supporting vital control research.
4. *Prevent Spread within Basins* — ANS management efforts should focus on preventing spread within, as well as between, basins. In the context of Asian carp, we need federal leadership to focus not only on preventing introduction to the Great Lakes Basin but also on preventing the Asian carps' spread to as-yet-untouched portions of the Mississippi River Basin. These areas should not be written off. Indeed, GLMRIS should evaluate the potential of such within basin measures to help prevent ANS transfer between the two basins.
5. *Engage the States* — We understand that USACE has taken initial steps to form a federal/state Executive Steering Committee to help guide implementation of GLMRIS. Thus far, state participation on the Steering Committee appears to have been limited to some of the Great Lakes Basin states. Given the significant and wide-ranging implications of the alternatives under evaluation for both basins, it is essential that all affected states be invited to participate on the Steering Committee. At minimum, this includes all Mississippi River corridor states as well as those states on the Great Lakes. We also invite and encourage USACE to provide briefings at UMRBA's quarterly meetings during the course of study implementation. We have been doing something similar with the Corps' Kansas City and Omaha Districts for the Missouri River Authorized Purposes Study (MRAPS) and have found it to be very effective for both the states and USACE.

6. *Engage Stakeholders* — It is also vital that USACE directly engage the full range of Mississippi Basin stakeholders in conducting GLMRIS. These stakeholders will offer valuable perspectives, expertise, and information for the study. The scoping meetings in Chicago, Minneapolis, St. Louis, Vicksburg, and New Orleans were an important first step. We encourage USACE to continue these efforts and to use the extensive network of existing forums and groups to reach stakeholders.
7. *Time is of the Essence* — Measures to prevent interbasin ANS transfer are needed urgently, particularly when it comes to Asian carp. And yet, as described above, some of the long-term options under consideration would likely have profound implications for both basins and thus require careful evaluation. Balancing these countervailing needs for timeliness and rigor is a difficult task. We encourage related efforts to address near-term prevention, such as the electric dispersal barriers, that are outside of GLMRIS's scope. We further encourage timely release of study products and any other findings that may further our common goal of preventing ANS transfer between the Great Lakes and Mississippi River Basins.

Fundamentally, successful ANS management efforts will require a mix of both prevention and control measures, implemented collaboratively. Toward this end, UMRBA and its five member states look forward to continuing to engage in GLMRIS. We would be pleased to provide any assistance that might prove useful. Please contact UMRBA Executive Director Barb Naramore (651-224-2880) with any questions concerning our comments.

Sincerely,



Michael D. Wells  
UMRBA Chair

cc: Major General John W. Peabody, Commander, Lakes and Rivers Division, USACE  
Major General Michael J. Walsh, Commander, Mississippi Valley Division, USACE  
Colonel Shawn P. McGinley, Commander, Rock Island District, USACE  
Colonel Thomas E. O'Hara, Commander, St. Louis District, USACE  
Colonel Michael J. Price, Commander, St. Paul District, USACE