



January 31, 2014

As posted on The Great Lakes and Mississippi River Interbasin Study website  
<http://glmrms.anl.gov/glmris-report/comments/>

### Response to **The Great Lakes and Mississippi River Interbasin Study (GLMRIS)**

CFUW Ontario Council is composed of 54 clubs within Ontario, comprised of members living in urban and rural areas across Ontario. We are non-partisan, nonsectarian, a voluntary, self-funded, non-governmental organization. Our members are active in public affairs, advocating on public education, justice, health and environmental issues as well as the status of women and human rights. Ontario Council is part of the Canadian Federation of University Women which is the largest affiliate of the International Federation of University Women.

This Study, recently released by the US Army Corps of Engineers, identified a total of 254 alien aquatic nuisance species (ANS) occurring in either the Great Lakes (GL) Basin, the Mississippi River (MR) basin, or in both basins. It identified a list of 35 ANS of Concern, which were identified as having a potential risk for both transferring from one basin to another, becoming invasive if they would disperse and would moderately to severely affect the invaded ecosystem. As the report noted, ANS can often have serious economic, political, and social impacts. They can degrade water quality, transport diseases, and often out-compete native species, upsetting natural ecosystems.

The Chicago Area Waterway System (CAWS) contains five aquatic pathways between the Great Lakes (GL) and Mississippi River (MR) basins. Thus the CAWS and other aquatic pathways along the MR and GL basin divide provide opportunity for ANS to transfer and to cause environmental, economic, and social/political impacts within the invaded basin. The Risk Assessment identified 13 species that had a High or Medium risk of establishment within either the Great Lakes (ANS coming from the Mississippi River Basins) or the Mississippi River Basins (ANS coming from the Great Lake Basin).

Perhaps the greatest current threat is that posed by the two species of fish (Bighead and Silver Carp) known as Asian Carp. Although the Scud-a shrimp-like crustacean that carries harmful parasites, is also considered a high risk invader. These three alien species are currently in the Chicago Waterway in the Mississippi Basin.

As the findings of this Study demonstrated, several nonstructural measures could potentially be applied to the ANS of concern. But, although they represent best management practices, and may reduce the speed or potential for ANS interbasin transfer at a given time, no nonstructural measures alone or in combination with other non-structural measures can be expected to reduce the probability of the establishment and/or interbasin transfer of ANS over the long term.

According to the research in this Study, there is only one type of remedy that can reasonably block the transfer of all ANS of Concern, and that is a "physical separation" – the restoration of the natural divide

between the Great Lakes and Mississippi River basins by means of physical barriers, as well as the creation of additional barriers elsewhere.

While this is a more expensive solution than some of the other alternatives listed, and gives rise to other challenges that must be dealt with, the expense of building physical barriers cannot compare with the expense of the potential overwhelming economic impact incurred if lesser alternative solutions are tried and fail.

The Ontario Council of the Canadian Federation of University Women would therefore urge Congress to recommend the implementation of the strongest permanent solutions presented in the report, that being either:

- Option 5: Lakefront hydrologic separation with physical barriers separating the basins at four locations along the lakefront of Lake Michigan, or
- Option 6: Mid-system hydrologic separation with physical barriers separating the basins at two mid-system locations.

And that in the meantime, all of the current and applicable nonstructural measures be continued in order to reduce the speed or potential for ANS interbasin transfer in the short term.

Sincerely  
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