

SUMMARY OF SPECIFIC COMMENTS

INVASIVE SPECIES

- **Environmental Protection Agency:** The Environmental Protection Agency provided detailed comments on the Aquatic Invasive Species, Habitat/Species, Coastal Health, Areas of Concern/Sediments, Nonpoint Source, Toxic Pollutants, and Indicators and Information sections of the draft report.
- **U.S. Department of Transportation:** DoT is cooperating with other agencies to prevent and control the spread of aquatic invasives.
- **Ohio DNR:** Should include studies to separate Great Lakes and Mississippi River systems; should include study of linking Great Lakes with other basins; was expanded role for Great Lakes Fisheries Commission considered?
- **Ron Sundell:** Should consider shutting down the Seaway and not allowing ocean going vessels into the Great Lakes
- **Paul Fuhrmann:** Recommend invasive species management programs on state level.
- **The Nature Conservancy:** In its comments, The Nature Conservancy includes general observations as well as specific comments on this Section of the report.
- **Crop Life America:** Need more research; critical to balance measures to prevent introduction of new species with those for controlling those that already are present.
- **Council of Great Lakes Industries:** It is premature to advocate comprehensive federal AIS legislation; measures for preventing the introduction and controlling species must be evaluated to avoid unintended economic consequences.
- **Michigan Dune Alliance:** Submitted its 2005 Eastern Lake Michigan Coastal Conservation Plan which it feels is especially relevant to Habitat/Species, Sustainable Development, Indicators and Information, and Aquatic Invasive species teams.
- **Richard Gibson:** Stopping the Asian carp before it reaches Lake Michigan must be a high priority.
- **Frank L. Maess:** Monitor all vessels coming and going to the Great Lakes from foreign ports.
- **Mariam C. McGillivray:** A top priority with little cost is to stop the arrival of new invasive species into the Great Lakes.
- **Jerry Hamelink, Ph.D.:** The plan to hydrologically separate the Great Lakes and the Mississippi River systems does not require further study but simply needs to be done immediately; Asian carp would destroy the Great Lakes ecosystem; plan to physically separate the Great Lakes from the Mississippi River will create jobs.

- **Hugh Mitchell, Atlantic Chapter - Sierra Club:** Provisions seem complete; if current shipboard ballast treatments are proven inadequate, effective alternatives should be implemented well before 2011; consider a moratorium on all ballast water discharges into the Great Lakes until an effective method to control invasive species is developed.
- **Robert Kodanko, Waukesha County Divers Association:** All great Lakes should take steps similar to Michigan to control the dumping of ocean-going ballast water; action, funding, and enforcement must be pursued at the federal level.
- **Chuck Hersey, Southeast Michigan Council of Governments:** While plan refers to aquatic invasive species, do not underestimate the cumulative of other species such as the emerald ash borer.
- **Gildo Tori, Ducks Unlimited:** We hope that Congress will enact legislation to address aquatic invasive species soon.
- **Peggy B. Johnson:** Effective educational campaigns to reach potential agents for the spread of invasive species are critical.
- **David F. Zetner:** Message regarding invasive species should be clear and coordinated; U.S. Coast Guard is an asset that has been underutilized; pursue effective planning of aggressive enforcement with significant penalties.
- **Ton Matych, Adopt a Walleye Program:** Electric fence on the Missouri River is ineffective; pursue a plan to kill the bighead carp in the Missouri River by moving native species to a safe zone, purchasing rotenone through donations and fund raising, adding the poison to the Missouri River, and release the native fish.
- **Insam Goldman:** Major clean-up efforts are needed for the lakes, including focus on invasive species and tighter shipping regulation.
- **Don Meixner, Michigan United Conservation Clubs:** Threat of Asian carp should indicate that no short-cuts can be taken on this issue.
- **Kathleen Steele:** More research and development regarding invasive land species abatement is needed; in coordination with invasive species abatement, provide employment opportunities in the Great Lakes region.
- **Bruce Caruso, Vice President of Perch America:** Stock native species such as walleyes in Lake Michigan to help control the Goby and create a sport fishery.
- **E. John Trimberger, Michigan Division and Dwight Lydell Chapter, Izaak Walton League of America:** Do not wait until 2011 to take action to control ballast water; immediate action needed to control other potential sources of exotics; existing regulations are insufficient; better regulation and enforcement to control exotics in ballast water is needed; if Federal government cannot take immediate action, states should immediately impose interim regulations.

- **St. Clair River Binational Public advisory Council:** Invasive species are not limited to exotics; ballast water control requires coordinated binational legislation and enforcement.
- **Charlotte J. Read:** Aquatic invasive species control seems an easier goal than the other seven, but removal or reduction will take a long time; move to stop invasive introduction as soon as possible.
- **James H. I. Weakley, Lake Carriers' Association:** We fully endorse prevention of new AIS introductions; we endorse the focus on ocean-going vessels; non-ocean-going vessels operating exclusively in the Great Lakes should review and apply "Best Performing Ballast Water Management Practices; goal of preventing new AIS introductions is important.
- **F. Ned Dimken, Ph.D and Michael J. Fischer, Esq., Great Lakes Boating Federation:** We are willing and ready to help develop and disseminate public awareness campaigns on invasive species among the recreational boating community.
- **Concerned Groups' Collective Comment on Great Lakes Regional Collaboration Draft Plan (Same letter as Tip of the Mitt Watershed Council):** Overall strategy is outstanding; we are concerned about possible delay in adopting recommendations; we support application of the precautionary principle; we strongly support interim steps; we support immediate adoption of comprehensive approaches in the National Aquatic Invasive Species Act and expedited action; we support state action; we support the recommendation for a reconnaissance study investigating permanent hydrological separation of Lake Michigan and Mississippi River basins; final restoration plan should support study of hydrological separation of other man-made connections between the Great Lakes and other watersheds.
- **Joel Brunsvold, Illinois Department of Natural Resources:** Proposed funding is unclear; further discussion needed in the development of priority area funding.
- **David D. Lonsdale:** GLRC should focus on passing legislation to eliminate red tape and secure funding for a strong campaign to address aquatic nuisance species; other vector routes beyond ballast water must be addressed.
- **Richard Hyde, City of Waukegan:** We strongly support quick passage of the National Aquatic Invasive Species act; reword Recommendation 2; emphasize local community participation in Recommendation 4; discharge of ballast water from ocean-going ships without a NPDES permit should be banned in the Great Lakes.
- **Gerald F. DePerry, Great Lakes Indian Fish and Wildlife Commission:** We support the Chippewa Ottawa Resource Authority staff's comments and recommendations; strategy should address terrestrial invasive species.
- **NOAA:** Page nine, first sentence of the third paragraph should more accurately state "more than 160 non-native, aquatic species are established in the Great Lakes, and an average of one new species has become established every eight months since at least 1959." so that the Executive Summary and actual text are consistent.

- **Waste, Pesticides and Toxics Division, EPA:** The need for a central place for the public, researchers, managers, and the public to report Aquatic Invasive Species listed on page 13 is feasible, the National Response Center for oil or chemical spills is a comparable example; a bureaucracy would be needed to respond to AIS reports; recommendations should perhaps include modification of the Clean Water Act so that creatures besides shellfish, fish, and wildlife are protected as parts of a balanced, indigenous population; all recommendations total an amount much lower than the five billion dollar estimate of the economic loss due to AIS.
- **John A. Andersen, Jr., The Nature Conservancy:** We support reauthorization of the National Invasive Species Act of 1990 and many of its provisions; ballast water and shipping should continue to be emphasized, but alternate pathways should be considered; we support the U.S. Fish and Wildlife Service's use of authority provided by the Lacey Act; add the Asian carp to the list of injurious wildlife.
- **Richard D. Swenson, Animal Husbandry and Clean Water Division, USDA/Natural Resources Conservation Service:** Second goal is actually two very different goals and should be separated; no justification given for the estimated costs of each recommendation; recommendations should identify responsibility parties for implementation; state recommendations as actions with action verbs; Recommendation 1's second bullet should indicate that the approved treatment should meet the most currently environmentally protective standard now; Recommendation 1's fifth bullet should include immediate implementation of effective alternatives to prohibit discharge of ballast water from ocean-going ships; Recommendations 2 and 3 should change "should" to "must" in the recommendation; last bullet in Recommendation 3 does not fit the recommendation to take immediate steps to prevent and spread AIS; eighth bullet of Recommendation 4 should make full use of the National Invasive Species Council's web portal; ninth bullet under Recommendation 4 should ensure that the revised National Invasive Species Management Plan include more focus upon dealing with invasive species problems in the Great Lakes.
- **Robert D. Hoffman, Ph.D., Ducks Unlimited:** We hope that Congress will enact legislation to address aquatic invasive species soon.
- **Great Lakes Sea Grant Network:** The network provided a series of general recommendations and a set of comments based on a series of workshops held during the 2003-2004 Great Lakes Restoration Workshop Series; in addition the network provided more specific comments on each of the 8 issue areas contained in the Draft report.
- **City of Chicago Department of the Environment:** We support the recommendations in this chapter, especially those calling for modifications to and passage of the pending NAISA legislation.
- **Michigan Division of Izaak Walton League:** While we support passage of NAISA we do not believe we should wait until the recommended date of 2011 before action is taken to control ballast water.

- **Ohio Environmental Council:** Plan should stress the need for immediate use of available authority and enforcement of existing laws to combat invasive species problem; terrestrial invasive species should be addressed in the plan (no pdf attached).
- **Izaak Walton League of America:** There needs to be better coordination among Agencies responsible for ballast water; suggest the Coast Guard immediately begin using existing technology involving using chlorine to treat ballast water.
- **B. Huberty:** Need to add remote sensing capabilities.
- **Grand Rapids Chapter of Michigan Salmon and Steelheaders:** Need to dramatically shorten length of time in developing plan (no pdf attached).
- **David Lonsdale:** Mr. Lonsdale included a comprehensive discussion that includes suggestions for addressing invasive species; increasing research, and improving the sustainable development section of the report.
- **Todd Pollesch, GLFC Sport Fishery Advisor:** I would like to see more resources directed toward the Invasive Species Act.
- **Sharon Duerkop:** Need to protect upstream waters from Lake contamination; this section of the report would benefit from more detail on the interim accomplishments and metrics on the accomplishments.
- **Ed Makauskas:** Recommendations are good but we need to see them implemented; the reauthorization of the NAIS is needed; ballast issue should be addressed immediately.
- **Glen Hemerick:** I believe you have seen the last of the zebra mussel and cladophora as well.
- **Great Lakes Indian Fish and Wildlife Commission:** The door must be closed immediately to new invasive species; the strategy should also address terrestrial invasive species.