

August 25, 1999

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Dear Ms. Short:

I am writing on behalf of the Mississippi Interstate Cooperative Resources Association (MICRA) to express our concerns regarding the recent spread of round gobies from Lake Michigan to the Cal-Sag and Sanitary and Ship Canals in the Chicago, IL area. MICRA is an organization of 28 state departments of conservation and natural resources in the Mississippi River Basin. The states organized MICRA in 1990 to improve the conservation, development, management and utilization of interjurisdictional fishery resources in the Mississippi River Basin through improved coordination and communication among the responsible management entities. One of MICRA's primary goals is to develop protocols, policies and regulations for disease control, introduction of exotics, maintenance of genetic integrity, and maintenance and enhancement of indigenous species.

The man-made Cal-Sag and Sanitary and Ship Canals, providing the only connection between Lake Michigan and the Mississippi River Basin, has become a significant point source for the spread of exotic

species from the Great Lakes to the Mississippi River Basin. Unless action is taken to control this problem, the round goby is expected to follow the path of the zebra mussel and spread to the waters of the entire Mississippi River Basin, significantly impacting many native species and important sport fisheries.

Where it is presently established in the Great Lakes, the increasingly aggressive round goby is (1) beginning to displace species such as perch, (2) monopolizing the food available to other forage fish, and (3) denying other species access to spawning grounds. In addition, the round goby is known to feed on the young or eggs of smallmouth bass, walleye and lake trout. Species such as smallmouth bass, perch, walleye, and lake trout are important Mississippi River Basin gamefish and support significant local and regional economies throughout the Basin. Action must be taken now to prevent the further spread of the round goby and other non-indigenous or exotic species to the Mississippi River Basin via the Cal-Sag and Sanitary and Ship Canals..

We understand that the Corps of Engineers is currently writing a scope of work to design and install an electric barrier to fish movement in the subject canals. This barrier is expected to be in place by the Spring of 2000. However, since significant downstream movement of gobies was detected in the canals earlier this year, this may be too late, and the Corps sees no way to significantly accelerate their construction schedule. Given these facts, the major concern is that the round gobies will spread past the electric barrier location before it is operational.

We also understand that the following stop-gap proposals are being considered by an interagency panel of scientists and resource managers:

- Canvas electric barrier - This would take 60 to 90 days to install and may not hold up under the barge traffic;
- Hydraulic barrier - This has not been field tested and would require significant effort including recessed piping in the walls and bottom of the canal to avoid barge damage;
- Oxygen reduction - This option could be used as a supplemental tool to prevent goby spread, but was not considered as a primary tool for the following reasons: (1) turning off the aeration station at the confluence may not kill the gobies and may push those at the confluence further downstream; (2) and Metropolitan Water Reclamation District of Greater Chicago (MWRDGC) is very sensitive to actions that may cause them to violate the water quality provisions of their existing permits from the state and the U.S. Environmental Protection Agency (USEPA); and
- Piscicide application - The following factors favor this approach: (1) gobies do not avoid two piscicides (i.e. antimycin or baylicide); (2) the pH of 7 for the canal water is good for the suggested piscicides; and (3) a bottom formulation could be used to keep the piscicide in the target area of the waterways.

The consensus of panel members was that piscicide application was the only possible solution that could be implemented in a timely manner with a likelihood of success. We support this decision with the following caveats:

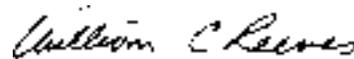
- Treat an area of the Illinois waterways from approximately 1/2 mile downstream of the confluence of the canals upstream in each canal to a point about 1/2 mile beyond the confluence (estimated cost \$60-80,000) as soon as possible (i.e. **before September 15**);
- After the treatment, temporarily stop aerating the water at the confluence of the canals until the proposed electric barrier is in place;
- Retreat as necessary until the electric barrier is installed;
- Continue monitoring to determine the goby distribution in the waterways; and
- Evaluate the feasibility of amending the MWRDGC permit to require that the aeration devices in the Cal-Sag and Sanitary and Ship Canals be periodically turned off for a time long enough for the waters to go anoxic and kill any species present. Although this would also kill any native species which entered

the canals, it would help to stop the spread of the invaders. We feel the multi-faceted approach of using both this technique and the electric barrier is needed because the electric barrier alone will likely not be 100% efficient. We further recommend that the USEPA conduct such a feasibility study as soon as possible and amend the MWRDGC permit, as appropriate. The importance of the native fish and the sport fisheries of the entire Mississippi River Basin far outweigh that which may be provided by these artificial canals.

The round goby, a native of the Black and Caspian seas, arrived in North America about nine years ago, likely in the ballast of foreign freighters. The global economy and global trade have thus become troubling pathways for exotic species to enter the Nation's interior waters and displace our native fish species, making this a federal issue. The burden of responding to this "biological pollution" should therefore not fall with the MICRA states and the sport fishers, but should be primarily federally funded or the responsibility of the groups benefitting from the presence of the Cal-Sag Sanitary and Ship Canals such as the maritime industry and the City of Chicago.

We trust that you will acknowledge our concerns regarding this matter, and take appropriate actions as soon as possible. Please keep us informed on matters related to this significant issue.

Sincerely,

A handwritten signature in black ink that reads "William C. Reeves". The signature is written in a cursive style with a large initial 'W'.

Bill Reeves
Chairman

cc: Association Members
Congressional Delegates