



November 14, 2008

Ken DeBeaussaert
Office of the Great Lakes
Department of Environmental Quality
P.O. Box 30473
Lansing, MI 48909-7973

Donna Stine
Director of Policy
Michigan United Conservation Clubs
P.O. Box 330235
Lansing, MI 48909-7735

Dear Ken and Donna,

This is to submit our comments on the DRAFT of the Michigan Great Lakes Plan: Our Path to Protect and Restore Michigan's Natural Resources. Several of our members participated in the regional meeting in Harrison Township on October 16th. We would like to submit additional comments based on further research and discussions. We appreciate the State of Michigan's effort in putting this forward-thinking plan together, and hope that our input will make the Plan more effective.

The Metro West Steelheaders Club (MWS) is a member of the Michigan Steelhead & Salmon Fishermen's Association (MSSFA) and an MUCC affiliate club. We are a group of anglers that are committed to conservation efforts and understand how they go hand-in-hand with healthy aquatic habitat and fish populations.

MWS would like to provide its experiences and on-the-water knowledge to the *Aquatic Invasive Species* (AIS) section of the Michigan Great Lakes Plan. MWS has first-hand knowledge of sport fishing on the Great Lakes. We are on the water in 18 fishing outings every year on the Great Lakes and connecting waters. More than 500 anglers attend these outings annually, generating over \$100,000 in economic activity.

MWS views: The AIS Problem on the Great Lakes

MWS is deeply concerned about the negative impact that *Aquatic Invasive Species* (AIS) has on the fish populations that Great Lakes sport fishing is based on (steelhead, salmon, lake trout, walleye, and the forage base). The problem is not going away, or diminishing. It is estimated that a new invasive species enters the Great Lakes every six months. The impact of aquatic invasive species on the Great Lakes has been known for more than 40 years, beginning with the sea lamprey and the alewife.

Knowing all of this, MWS feels that the Michigan Great Lakes Plan (referred to hereon as *The Plan*) lacks the sense of urgency and commitment to decisive action to truly address the AIS problem.

MWS feels that *The Plan* fails to recognize just how devastating AIS is to the health of the Great Lakes. Although the goal stated on pg. 7 is strong ("Prevent all new introductions of AIS into Michigan... ..clearly identify and organize responsibilities and authorities..."), the actions and recommendations are inadequate to achieve this goal.

MWS urges you to strengthen the AIS actions and recommendations in the following ways:

1. Establish measurable, date-certain actions/targets for AIS, the same as *The Plan* calls for wetlands restoration (pg. 17) and mercury reduction (pg. 43).

2. *The Plan* must put more emphasis on prevention rather than rapid response, control and education. Experience clearly shows that funding and programs aimed at preventing the introduction of new species in the first place is greatly more cost-effective than controlling AIS species once they are established; and that eliminating an established AIS species is virtually impossible.
3. *The Plan* must call for greater accountability and joint actions with the other legal jurisdictions within the Great Lakes basin. Notably, these are the federal agencies (Coast Guard, EPA, Fish & Wildlife Services, NOAA), and the neighboring Great Lakes states and provinces. This must include enforcement/regulatory measures currently allowed under the law, up to and including litigation (reference the use of judicial means by Eastern states in addressing air pollution and acid rain deposition).
4. *The Plan* must call for greater partnerships in the recommended actions. This includes state/federal agencies not normally involved with natural resource issues (Agriculture, Economic Development, Attorney General) as well as NGO's. The Great Lakes are so large, the issues are so complex that only a comprehensive, far-reaching plan can work. The Plan must be bottom-up, as well as top-down.

Please consider more specific comments on four AIS issues, as spelled out in the attachment:

- Cormorants. *The Plan's* AIS section must include cormorant damage to Great Lakes fisheries.
- Zebra/Quagga mussels. *The Plan's* AIS section must include measurable, date-certain goals and actions to reduce the impact of zebra/quagga mussels.
- Ocean-going shipping. Ballast water regulation is inadequate to prevent the introduction of new AIS species into the Great Lakes basin.
- Asian carp. *The Plan's* AIS section must include greater urgency and emphasis on the damage posed by the AIS vector at the Chicago Sanitary and Shipping Canal.

In conclusion, MWS appreciates the efforts of the State of Michigan and MUCC in developing the Michigan Great Lakes Plan. Thank you for the opportunity to provide our input. Please keep us informed on *The Plan's* progress, and let us know how we can help ensure its success.

Sincerely,

Jim Robertson
President, Metro West Steelheaders Club

cc: Lt. Governor John Cherry
Senator Carl Levin
Senator Debbie Stabenow
Congresswoman Candice Miller
Rebecca Humphries, MI Dept of Natural Resources
Steve Chester, Director, MI DEQ
Craig Czarnecki, U.S. Fish & Wildlife Service
MI Representative Marc Corriveau
Andy Van Pelt, MSSFA Exec. Director
Rick Balabon, Pres. MSSFA
Metro West Steelheader Members (Signatures attached)



Metro West Steelheaders
Jim Robertson, President
14922 Robinwood
Plymouth, MI 48170

Attachment

Michigan Great Lakes Plan: Our Path to Protect and Restore Michigan's Natural Resources

Comments by Metro West Steelheaders Club Attachment to Letter, October 2008

Cormorants

The Plan's AIS section must include cormorant damage to Great Lakes fisheries. That the cormorant is not a true 'invasive' species is a moot point. The significant damage caused to fish stocks by excessive cormorant populations is well documented, and has been known for years. Huge nesting colonies have overwhelmed many local habitats in the Great Lakes, notably the rare and unique offshore islands in Lake Michigan, Lake Huron, and Lake Erie.

Programs to control cormorant populations have only recently begun, and the efforts are inadequate and are being given insufficient resources.

The stalemate within the Michigan Interagency Cormorant Control Group must end. Despite overwhelming evidence of significant cormorant predation and the positive response of bird control measures on fish populations, DNR Wildlife and DNR Fisheries remain deadlocked. Tribal agencies and the sportfishing community are united in a call for urgent, aggressive bird reduction measures (for reference, www.flintsteelheaders.com/cormorant_control.htm).

The Plan must establish measurable, date-certain deadlines for reducing cormorant populations to normal levels consistent with habitat.

The Plan must call for a comprehensive cormorant population management plan that includes responsibilities and accountability for federal, state, and other Great Lakes state/provincial jurisdictions, through the Great Lakes ANS Coalition.

Zebra/Quagga mussels

The Plan's AIS section must include measurable, date-certain goals and actions to reduce the impact of zebra/quagga mussels. The impact of these invasive species is well documented and is costing the public and private sectors billions of dollars annually in maintenance.

Evidence suggests these invasive species have completely altered the Great Lakes ecosystem. The effects of this are long-term and still not fully known.

The Plan must call for a comprehensive zebra/quagga mussel population management plan that includes responsibilities and accountability for federal, state, and other Great Lakes state/provincial jurisdictions, through the Great Lakes ANS Coalition.

With a sense of urgency, *The Plan* must call for research to find a biological control for zebra/quagga mussels.

Ocean-going Shipping

Ballast water regulation is inadequate to prevent the introduction of new AIS species into the Great Lakes basin. Basin-wide legislation would be difficult to achieve, and enforcement difficult and expensive.

The only realistic method to achieve *The Plan's* stated goal (preventing new AIS species) is to close the Great Lakes to ocean-going shipping. Recent economic analysis has documented that use of rail and trucking is a more cost-effective method of meeting the shipping needs now being served by ocean-going freighters allowed to use the Great Lakes. Cost vs Benefit of ocean-going ships indicate that their presence on the Great Lakes is not worth the cost. This needs to be confirmed and agreed and then used in action plans.

The Plan should call for a date-certain goal and action plan to close the Welland Ship Canal, and work with intermodal transportation agencies to develop a feasible, cost-effective alternative for the needs of commerce.

Asian Carp

The Plan's AIS section must include greater urgency and emphasis on the damage posed by the AIS vector at the Chicago Sanitary and Shipping Canal. Although progress on the dispersal barrier system is significant, it is still not permanent.

The threat posed by introduction of the Asian carp into the Great Lakes basin is known, and it would be devastating.

The Plan must call for a date-certain goal and action plan to make the operation of the dispersal barrier complete and permanent.

The Plan must call for a date-certain goal and action plan to establish the hydrologic separation of the Great Lakes from the Mississippi basin.

