



April 13, 2023

U.S. Army Corps of Engineers-Omaha District
CENWO-PMA-C
ATTN: Clayton Ridenour
Watercraft Inspection EA
1616 Capitol Avenue
Omaha, NE 68102-4901

Dear Mr. Ridenour,

The Izaak Walton League of America appreciates this opportunity to comment on the Programmatic Environmental Assessment (EA) to establish, and operate, watercraft inspection stations in the Upper Missouri River Basin (UMRB). This EA will examine the economic and environmental impacts to determine if the Federal government should participate in ongoing state-managed programs to prevent the spread of aquatic invasive species (AIS).

The League has over 42,000 members in more than 200 chapters across the country. Many of our members live within the basin and enjoy spending time on, and along, the Missouri River.

The Missouri, the nation's longest, and many say, most historic river, provides drinking water for over 12 million Americans. It's the backbone of the booming recreation industry offering year-round, world-class opportunities. The Federal government has substantial investments in water supplies, hydropower, recreation, and environmental infrastructure on the river.

Background

Currently, the UMRB has a low infestation of invasive zebra or quagga mussels as compared to other areas of the country. However, the UMRB is at an extremely high risk of AIS due to people's high rate of mobility, and water temperatures that provide a long reproductive season. People quickly travel from state to state. Watercraft are used in one state, then are rapidly transported to other areas of the country, or the UMRB, a day or two later.

Impacts

Invasive mussels can temporarily improve water clarity as they filter plankton from the water. However, this alters the food chain and reduces reproduction of native fish and shellfish. AIS change aquatic plant communities, including how deep plants grow. Zebra mussels contribute to toxic blue-green algae blooms that impact water quality and impact people, pets, and livestock.

Millions of people enjoy spending time in the UMRB. AIS infestation would have negative ramifications that would affect the local, regional, and national economies. Hundreds of millions of dollars has been invested in the UMRB in recreational facilities, hydropower, and

water projects. The League agrees a wider audience must be reached on the impacts of AIS, and what people must do to stop their spread.

Inspection and Decontamination Stations

More watercraft inspection stations are needed to search for invasive mussels, and other invasive species. If found, the vessel must be decontaminated to stop the spread. The proposed Federal action allows participation in a cost-shared effort to establish new or enhanced watercraft inspection stations. The stations are currently maintained and operated by non-Federal sponsors in Montana, Wyoming, North Dakota, South Dakota, and Nebraska.

The goal is reducing the spread of AIS at USACE reservoirs and other waters in the UMRB. Inspection and decontamination stations would be placed at locations with the highest likelihood of preventing the spread of AIS. The Secretary would determine those sites, in consultation with the Governors and the other entities described in the proposal.

The effort would be funded on a 50/50 cost share with state, Tribal, and other entities. The increased inspection stations would not negatively impact recreation. Due to the rapid spread of AIS people are accustomed to AIS inspection and education efforts, and they know the importance of preventing the spread of AIS.

To be successful the inspection stations must be located at appropriate sites and operated and maintained throughout the season. The purpose of this proposed action is to help the five states establish and operate inspection stations, enhance monitoring for adult and veliger zebra and quagga mussels, and develop a rapid response plan to prevent the spread of AIS within the UMRB. Inspection stations provide a great opportunity to increase the public awareness of AIS.

Measures

The League endorses the use of the measures outlined in this proposal developed with state AIS coordinators. We especially support increasing the number of watercraft inspection stations in the UMRB and increasing the time of operation for those stations to reduce the spread of AIS. We support adding canine detection capabilities to the watercraft inspection program. There were no significant technical or engineering challenges in any of the measures in the proposal.

Alternative 2

The League supports the adoption of Alternative 2, the recommended alternative. This is composed of the measures listed in Section 3.5. Alternative 2 has USACE partnering with the states and using Federal funding to expand and support existing programs. We agree this will result in greater effectiveness of the programs and will help prevent the spread of AIS. When needed, we also support revisions or adaptations to the inspection protocols to improve the efficiency of the effort. The cost of Alternative 2 is a fraction of the costs of an AIS infestation.

We respectfully ask for your consideration of our comments on the following topics.

Boats and Marine Facilities

An AIS infestation complicates marina and boat ramp facilities. Mussels will attach to a stored boat which can lead to engine damage and boat safety issues. If a waterbody is infested there is an extremely high likelihood that the stored vessels will also be infested. This will result in higher costs for the operator of the facility and the owner of the vessel. The League encourages

efforts through this proposal by the Corps and the states to work with these facilities to help prevent the spread of AIS.

Hydropower Generation

There are great concerns with AIS related to hydropower generation from the mainstem Missouri River dams. These costs have been estimated to be in the millions of dollars a year to clean and inspect power plants and retrofit the facilities for AIS. We urge collaboration with the power utilities to enlist their help in preventing the spread of AIS in the UMRB.

Hatcheries

The eight fish hatcheries in the UMRB annually provide sport fish that are stocked in waters across the region. This helps keep fisheries viable and productive for anglers. AIS could have a major impact on these facilities. Through this proposal the League encourages the Corps and the states to coordinate efforts with the hatcheries' staff that prevent the spread of AIS into the UMRB.

Climate Change

The impacts of climate change must be considered in this proposal. Future climate models indicate the UMRB will experience less snowfall, which will result in reduced river flows. The basin is expected to see an earlier snowmelt, and more rain than snow during the winter. Increasing temperatures could lead to an extended potential reproductive period for AIS. All these factors are additional reasons to prevent the spread of AIS.

Tribal Coordination and Consultation

In addition to working with the five states, the League also recommends the Corps exercise government-to-government consultation with the UMRB Tribes. Tribal governments must be consulted on all aspects of the project and the locations of potential watercraft inspection sites. Cultural, historic, or religious sites of significance must be identified and respected.

Public Education and Outreach

The League strongly endorses continued public outreach and education campaigns including Clean, Drain, and Dry, and Stop Aquatic Hitchhikers. We encourage more communication through trainings, presentations, social and traditional media, videos, public service announcements, increased signage at boat ramps and recreation areas, materials with fishing and boating licenses, and information at sport and boat shows, fairs, expos, and other events.

We also support increased efforts with boat manufactures encouraging improved designs for easier access to ballast water tanks, and live, and bait wells on all vessels and boats. This will enable complete drainage and thorough decontamination of those watercrafts.

Summary

The League agrees preventing the spread of AIS should be the UMRB's number one priority. This must include keeping contaminated watercraft from entering water bodies in the basin. When this EA is reviewed and approved, the USACE will execute the Watercraft Inspection Program Project Partnership Agreement (PPA) with the states or organizations representing states. This includes the Western Invasive Species Coordination Effort (WISCE) that plans to provide effective and efficient use of Federal cost-share funds to protect waters in the Western United States.

The length of this study is 50 years. The estimates of the average annual operations and maintenance cost savings by stopping an infestation for 25 years is over \$34 million. The estimated average annual costs of the inspection station program over 25 years is approximately \$6.5 million. This is a benefit-cost ratio of 5.26 to 1, not including the ecosystem benefits associated with preventing an AIS infestation. Federal participation is dependent on the states' funding of this program and future Congressional appropriations.

We understand this EA will evaluate potential environmental effects of establishing watercraft inspection stations throughout the UMRB. If those effects are insignificant, a Finding of No Significant Impact (FONSI) would be issued and the USACE would proceed with the program. If environmental effects are significant, an Environmental Impact Statement (EIS) would be prepared before a decision is made on whether to implement the program.

The Izaak Walton League of America appreciates this opportunity to comment on the Programmatic Environmental Assessment to establish, and operate, watercraft inspection stations in the Upper Missouri River Basin.

Again, we support the adoption of Alternative 2 and we ask to be kept informed on all future developments regarding this topic. Thank you for your time and consideration.

Sincerely,



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