



Great Lakes Commission des Grands Lacs

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*Ensuring environmental and
economic prosperity for the Great
Lakes-St. Lawrence region through
communications, policy research and
development, and advocacy.*

November 17, 2003

Everett Wilson, Chief
Division of Environmental Quality
U.S. Fish and Wildlife Service
4401 North Fairfax Drive, Suite 322
Arlington, VA 22203

ATTN: RIN 1018-AI87

Dear Mr. Wilson:

I am writing regarding the proposed rule to list the bighead carp (*Hypophthalmichthys nobilis*) as an injurious species of wildlife under the federal Lacey Act, as published in the September 18, 2003 issue of the Federal Register (Vol. 68, No. 180), RIN 1018-AT49.

The Great Lakes Commission was established in 1955 via U.S. federal and state law to "promote the orderly, integrated and comprehensive development, use and conservation of the water resources of the Great Lakes basin." The Commission addresses a range of issues involving environmental protection, resource management, transportation and sustainable development. Since 1991, the Commission has provided professional staff support to the Great Lakes Panel on Aquatic Nuisance Species, a regional entity that has been mandated under the Nonindigenous Aquatic Nuisance Prevention and Control Act. The Great Lakes Panel has significantly advanced aquatic nuisance species prevention and control through its contributions to legislation and policy, information and education, and research coordination.

In my capacity as President/COE of the Great Lakes Commission, I am pleased to convey the concern expressed by Great Lakes Panel membership regarding the threat of Asian carp to the integrity of the Great Lakes ecosystem and inhabiting native aquatic communities. Bighead carp, silver carp and grass carp are threatening our fisheries and aquatic resources. We support the strongest possible federal action taken to control the introduction and spread of aquatic invasive species. Rapid and decisive action should be taken immediately.

There is critical concern in the Great Lakes region for the threat that bighead carp pose to native mussels and fish communities. These invasive fish are efficient filter feeders and compete directly for food with larval fishes, native mussels and some native adult fish species. This competition could reduce the numbers of native fish and alter the entire Great Lakes food web, which is already under tremendous stress from other nonindigenous species that have invaded the region.



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In addition to listing the bighead carp, we also strongly support the addition of black, grass and silver carp to the list of injurious species under the Lacey Act. There is a need for regulatory action to eliminate interstate shipment of live Asian carp. Although some carp species have expanded their range across much of the Mississippi River Basin, they still do not occur in most North American watersheds and every effort should be made to limit their spread.

As a result of the current Asian carp expansion into the Chicago Sanitary and Ship Canal, extraordinary measures are now being taken at great public expense by Great Lakes interests in both the United States and Canada to close these waterway connections through the use of various fish control applications. Expanding the Lacey Act listing to include black, grass, bighead and silver carp would enhance that effort by preventing the interstate shipment of live fish in the Great Lakes watershed.

In conclusion, I encourage the U.S. Fish and Wildlife Service to take decisive and aggressive action to limit the spread of bighead carp, as well as black, grass and silver carp by listing the four carp species as injurious under the Lacey Act. With appropriate action we can all work to protect the beneficial uses of the Great Lakes fishery and prevent ecological and economic damage caused by aquatic invasive species to these aquatic resources in the future. It is imperative that we act quickly so that our control efforts have a chance of success.

Thank you for the opportunity to comment on this important high priority issue.

Sincerely,

Michael J. Donahue, Ph.D.
President/CEO