



COUNCIL OF LAKE COMMITTEES

2100 Commonwealth Blvd. Ste. 100
Ann Arbor, MI 48105

Representing the
fishery
management
agencies of the
Great Lakes basin.

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September 19, 2002

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

Dear Mr. Wilson:

On behalf of the Council of Lake Committees (CLC), we strongly support the U.S. Fish and Wildlife Service's (Service) proposal to list the black carp (*Mylopharyngodon piceus*) as an injurious species of wildlife under the federal Lacey Act. This proposal, as published in the July 30, 2002 edition of the *Federal Register* (vol. 67, no. 146; RIN 1018-AG70), is based on a petition by the Mississippi Interstate Cooperative Resources Association (MICRA) and would help significantly in our collective effort to protect the Great Lakes from harmful invasive species. We also urge that additional action be initiated to list other Asian carp species widely used in aquaculture, namely the bighead (*Hypophthalmichthys nobilis*) and silver carp (*H. molitrix*), as injurious species.

The CLC concurs with the Service's assessment in the *Federal Register* that "the likelihood of release or escape of black carp is high . . ." while the " . . . ability and effectiveness of measures to prevent escape or establishment are low." We know from past experience that attempts to contain fish in aquaculture ponds or in other closed facilities are usually futile; escapement via the aquaculture industry, bait sales, and other mechanisms are all but inevitable. Indeed, three other species of Asian carp have already escaped their captivity and become established in the Mississippi basin. Without immediate action to list the black carp as injurious, there is little doubt that black carp will follow the same route as the other Asian carp species.

We are convinced that once the black carp escapes captivity, the species will find the Great Lakes to be a suitable environment in which to thrive. We have no doubt that like many other invasive species, the black carp will rapidly become established. We must therefore not allow the carp access to this environment.

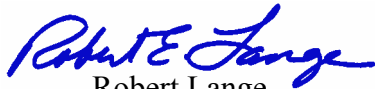
There is little doubt that should black carp be allowed access to the Great Lakes environment that their impact will be severe. Like many invasive species, black carp have the ability to play havoc on the ecosystem. Black carp are likely to compete with native species for food. The *Federal Register* lists several species of fish and wildlife that would likely be in direct competition with the black carp,

should the carp become established. Many of these species are found in the Great Lakes. The potential for black carp to be injurious to the Great Lakes is heightened by the fact that they are voracious eaters, growing to lengths of more than three feet and to weights of more than 150 pounds. The literature and the *Federal Register* list many other injurious qualities of the black carp such as destroying habitat, transferring parasites to other fish, and reducing biodiversity.

Finally, we believe that bighead and silver carp should also be listed as injurious species. We remain very concerned about the potential of these species to invade the Great Lakes and we have supported the construction of physical barriers to prevent their migration from the Mississippi basin. We believe listing other Asian carp species as injurious would significantly bolster our efforts to limit their spread.

Again, we strongly support the Service's proposal to list black carp as an injurious species. We urge adoption of your proposal in the *Federal Register* and then to go a step further and initiate action to list the other Asian carp species that threaten the Great Lakes ecosystem. We appreciate your efforts to protect the biological integrity of the Great Lakes.

Sincerely,



Robert Lange
Chair
Council of Lake Committees



David McLeish
Vice-chair
Council of Lake Committees

Cc: Mr. Steve Williams, Director, U.S. Fish and Wildlife Service
Judge Craig Manson, Assistant Secretary for Fish and Wildlife and Parks
Hon. Carl Levin, Co-Chair, Great Lakes Task Force
Hon. Mike DeWine, Co-Chair, Great Lakes Task Force
Hon. John Dingell, Co-Chair, Great Lakes Task Force
Hon. Vern Ehlers, Co-Chair, Great Lakes Task Force
Hon. Steve LaTourette, Co-Chair, Great Lakes Task Force
Hon. James Oberstar, Co-Chair, Great Lakes Task Force
Ms. Joy Mulinex, Director, Great Lakes Task Force
Mr. Rob Graham, Chair, Canadian Committee of Advisors
Mr. Mike Ryan, Chair, U.S. Committee of Advisors