



# GREAT LAKES LAW ENFORCEMENT COMMITTEE



September 24, 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. Williams:



We are writing on behalf of the Great Lakes Law Enforcement Committee to **strongly support** the U.S. Fish and Wildlife Service's proposal to list the black carp (*Mylopharyngodon piceus*) as an injurious species of wildlife under the federal Lacey Act. This proposal was published in the July 30, 2002 edition of the *Federal Register* (vol. 67, no. 146; RIN 1018-AG70), in response to a petition by the Mississippi Interstate Cooperative Resources Association. The Law Enforcement Committee is composed of the representatives of the eight Great Lakes states, the province of Ontario, tribal groups, and the United States and Canadian federal governments. The committee functions to protect, enhance, and promote the safe and wise use of the natural resources in the Great Lakes.



The Law Enforcement Committee is extremely concerned about the proposed introduction of black carp, given the potential drastically negative impact that black carp would ultimately have on the Great lakes ecosystem. The proposed introduction of black carp into the United States poses a totally unacceptable threat to the ecological integrity of the Great Lakes as well as to native fauna elsewhere in the nation.



Further, the Law Enforcement Committee strongly requests that two additional Asian carp species, the bighead carp (*Hypophthalmichthys nobilis*) and silver carp (*H. molitrix*) also be listed as injurious species of wildlife.



As you are well aware, three species of Asian carp have already escaped from aquaculture facilities, have become established and very abundant in the Mississippi basin, and are poised to enter the Great Lakes. It is a certainty that if the grass carp, bighead carp and silver carp successfully invade the Great Lakes, they will become established and abundant throughout the Great Lakes, and will significantly disrupt and transform the ecology of the Great Lakes, particularly in the nearshore waters. To prevent this invasion, millions of dollars are being spent to construct electrical barriers to effectively block the waterway connection between the Mississippi River and Lake Michigan. To prevent introductions into the Great Lakes via the baitfish and live food industry the Law Enforcement Committee is working with the Council of Lake Committees to develop and enforce state legislation to prohibit or restrict the culture,



...2

possession, transport, and sale of Asian carp. 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.

To protect the Great Lakes, the Law Enforcement Committee is now focused on the promulgation of rules and regulations to eliminate or minimize the potential impact of the Asian carp species that have already escaped from aquaculture. To allow the introduction of yet another species of Asian carp into the United States is an unconscionable act with potential for environmental disaster.

In summary, Mr. Wilson, the Great Lakes Law Enforcement Committee requests that the black carp be listed as an injurious species of wildlife under the federal Lacey Act. Further, the committee requests that the bighead carp and the silver carp be similarly listed.

Thank you very much for considering our request.

Sincerely,



for Kevin Barber OMNR  
Chair  
Law Enforcement Committee



Robert Nestor PAFBC  
Vice-chair  
Law Enforcement Committee

Cc: Mr. Steve Williams, Director, U.S. Fish and Wildlife Service  
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  
Mr. Robert Lange, Chair, Council of Lake Committees  
Mr. David McLeish, Vice-Chair, Council of Lake Committees  
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