



October 12, 2006

Dr. Roger Helms
Chief, Branch of Invasive Species
U.S. Fish and Wildlife Service
4401 North Fairfax Drive
Suite 322
Arlington, Virginia 22203

JIM DOYLE
CHAIR
Governor of Wisconsin

RE: RIN Number 1018-AT29

ROD BLAGOJEVICH
Governor of Illinois

Dear Dr. Helms:

MITCH DANIELS
Governor of Indiana

Thank you for the opportunity to submit comments regarding the U.S. Fish and Wildlife Service's (USFWS) proposed rule to add all forms of live silver carp and largescale silver carp to the list of injurious fish under the Lacey Act. The Asian carp represent one of the most imminent and most dangerous threats to the Great Lakes. Therefore, the Great Lakes Governors strongly support the proposed rule as well as further steps to ensure that the Lakes are protected from potentially harmful, non-native species.

JENNIFER M. GRANHOLM
Governor of Michigan

GEORGE E. PATAKI
Governor of New York

Silver carp, along with other species of Asian carp, pose a significant threat to the health of the Great Lakes. This threat is due to their ability to compete with native species for food, destroy fish habitat, transfer parasites and diseases, and reduce biodiversity. They also pose a significant threat to human health due to their propensity for jumping in the vicinity of nearby, moving motorized watercraft. As the USFWS has noted, numerous injuries have been reported, including black eyes, broken bones and concussions. Incidents of property damage have included broken radios, depth finders and fishing equipment. Additionally, the silver carp and largescale silver carp pose a significant threat to our region's economy. USFWS estimates that some \$18 billion is generated annually in the Great Lakes region by hunting, fishing, wildlife watching and related activity.

TIM PAWLENTY
Governor of Minnesota

ED RENDELL
Governor of Pennsylvania

BOB TAFT
Governor of Ohio

DAVID NAFTZGER
Executive Director

Clearly, protecting the Great Lakes from the Asian carp and other potentially injurious, non-native species requires a multi-faceted approach. Through the Council of Great Lakes Governors' Aquatic Invasive Species Task Force, the Great Lakes Governors are providing leadership to regional efforts. For example, the Governors have partnered with the U.S. Army Corps of Engineers to work towards the successful construction of a dispersal barrier in the Chicago Sanitary and Ship Canal to prevent the Asian carp's spread into the Great Lakes. The Great Lakes States have spent a total of \$2.275 million towards the construction of this project.

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Suite 1850
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We agree with the USFWS's assessment that silver carp and largescale silver carp are likely to spread beyond their current established range, are likely to

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compete with native species for food and habitat and are likely to have negative impacts on humans. We also agree with the assessment that these carp are difficult to eradicate and that it is difficult to recover ecosystems disturbed by the species. For the reasons listed above, the Great Lakes Governors strongly support listing silver carp and largescale silver carp as an injurious species under the Lacey Act.

Additionally, we ask that all species of injurious carp, including bighead and black carp, be listed in recognition of the significant dangers they pose to the Lakes.

We look forward to continuing to work with USFWS and other federal agencies in our ongoing efforts to protect and restore the Great Lakes. Please do not hesitate to contact us if there are questions. Our staff contact is David Naftzger, Executive Director of the Council of Great Lakes Governors at 312-407-0177.

Sincerely,

A handwritten signature in black ink that reads "Jim Doyle". The signature is written in a cursive, flowing style.

Jim Doyle
Governor of Wisconsin
Chair, Council of Great Lakes Governors

CC: H. Dale Hall, Director, U.S. Fish and Wildlife Service