



November 3, 2006

Kerri Duncan
Chief
Branch of Invasive Species
US Fish and Wildlife Service
4401 North Fairfax Drive, Suite 322
Arlington, VA 22203

RE: RIN number 1018-AT29

Dear Chief Duncan:

On behalf of the Great Lakes and St. Lawrence Cities Initiative (GLSLCI), a voluntary coalition of mayors dedicated to long-term restoration and protection of the Great Lakes, I am writing to express strong support for the U.S. Fish and Wildlife Service's (USFWS) proposed rule to add live silver carp and largescale silver carp to the list of injurious species under the Lacey Act.

Great Lakes mayors have recognized for several years that all species of Asian carp pose an unacceptable risk to the Great Lakes ecosystem and the \$4 billion Great Lakes fishing industry. As USFWS is well aware, Asian carp have already devastated parts of the Mississippi and Illinois Rivers, severely disrupting their native fish populations and adversely impacting their fishing industries.

Mayors have not been willing to stand by and risk this same consequence for the Great Lakes. For that reason, along with many other elected officials and interest groups, we have been calling since 2002 for the Asian carp to be listed under the Lacey Act. The need to list Asian carp under the Lacey Act is also included in the Great Lakes Regional Collaboration Strategy that was released in December 2005, pursuant to the President's Executive Order on Great Lakes that was issued in May 2004.

Great Lakes mayors have also been working on a variety of other efforts to stop the Asian carp from entering the Great Lakes, including the installation of electric dispersal barriers in the Chicago Sanitary and Ship Canal to help stop all species of Asian carp from entering the Great Lakes system and encouraging municipal governments throughout the Great Lakes region to impose local bans on live Asian carp.

Our ongoing efforts to stop the Asian carp from entering the Great Lakes stand to be undermined with each passing day that a federal ban on the importation and interstate trade of Asian carp is not in place. Accordingly, the proposal from USFWS to ban silver and largescale silver carp is strongly supported by Great Lakes mayors. We encourage FWS to promptly finalize this important rule.

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David Miller, Mayor of Toronto, Chair

Richard M. Daley, Mayor of Chicago, Founding Chair



At the same, however, we continue to be very concerned about the possibility of other species of Asian carp, namely bighead carp and black carp, entering the Great Lakes. These species of carp have caused the same damage to bodies of water that the silver and largescale silver carp have caused. We strongly encourage FWS to expeditiously add these species of carp to the list of injurious species under the Lacey Act.

Thank you for the opportunity to submit comments on the proposal. We look forward to continuing to work with the USFWS on continuing efforts to restore and protect the Great Lakes. If you have any questions, please feel free to contact me at (312) 201-4516.

Sincerely,

David A. Ullrich
Executive Director