



November 6, 2006

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

RE: RIN Number 1018-AT29

Dear Dr. Helms:

The Healing Our Waters® – Great Lakes (HOW) Coalition strongly supports the U.S. Fish and Wildlife Service proposal to list the silver carp (*Hypophthalmichthys molitrix*) and largescale silver carp (*Hypophthalmichthys harmandi*) as injurious species under the Lacey Act. Additionally, all species of injurious carp, including the bighead and black carp, should be listed because they all pose significant dangers to the Great Lakes.

The HOW Coalition is a group of over 90 national, regional, and local organizations working to restore and protect the Great Lakes. The Coalition represents millions of Americans that live in, work in, and love this national treasure.

Asian carp present a serious threat to the Great Lakes ecosystem and the many millions of people who rely on the Great Lakes for jobs, drinking water, and recreational opportunities. Because of their rapid reproduction and growth and opportunistic feeding habits, these fish out compete native fish and wildlife, including threatened and endangered species. Asian carp are also a public safety threat. They cause injuries to people due to their jumping habits around moving watercraft. Cuts from fins, black eyes, broken bones and concussions are not uncommon in the areas where these fish have been found.

Asian carp also threaten to undermine the region's economic resources. These species could devastate a \$4.5 billion commercial and recreational fishery and hurt the \$18 billion that is generated annually in the Great Lakes region by hunting, fishing, wildlife watching and related activity on our lakes and in our national parklands.

The undersigned members of the HOW Coalition strongly agree with the Great Lakes Regional Collaboration (GLRC) Strategy recommendation "...the Fish and Wildlife Service FWS should list black, bighead, and silver carps as injurious under the Lacey Act." The Collaboration, which was begun by President Bush, is a multi-stakeholder initiative that produced a blueprint to restore and protect the Great Lakes. We also agree with the Fish and Wildlife Service that this action is necessary to "protect the interests of human beings, and wildlife and wildlife resources, from the purposeful or accidental introduction and subsequent establishment of silver carp and largescale silver carp populations in ecosystems of the United States."

The HOW Coalition also supports other efforts to keep Asian carp out of the Great Lakes. We strongly support the construction, operation, and maintenance – at full federal expense – of the barrier system in the Chicago Sanitary and Ship Canal. We also support passing comprehensive aquatic invasive species legislation.

We look forward to working with the U.S. Fish and Wildlife Service and all federal and state agencies in our efforts to protect and restore the Great Lakes. Please do not hesitate to contact the Coalition's policy director, Chad Lord, at 202-454-3385 with any questions.

Sincerely,

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