

STATE OF MICHIGAN
DEPARTMENT OF ATTORNEY GENERAL



MIKE COX
ATTORNEY GENERAL

P.O. Box 30212
LANSING, MICHIGAN 48909

November 3, 2006

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

Dear Dr. Helms:

Re: RIN Number 1018-AT29

This letter is submitted in support of the U.S. Fish and Wildlife Service's proposed rule to designate silver carp and largescale silver carp as injurious species under the Lacey Act. Prohibiting the import, interstate transport, and acquisition of all forms of these non-native species of Asian carp is critical. If these species enter the Great Lakes, they will have a devastating impact on the Great Lakes ecosystem and the \$4.5 billion Great Lakes fishery.

As a Great Lakes Commissioner, I believe the Commission's Resolution of October 4, 2006, makes a convincing case for why these species are injurious to wildlife and wildlife resources, as well as to human beings. The resolution states that Asian carp are a grave threat to native fish and wildlife because of their rapid reproduction and growth, opportunistic feeding habits, and ability to degrade habitat through increased sediment suspension. In addition, silver carp are a threat to boaters because the large fish jump into the air when disturbed by motors. Boaters hit by silver carp have suffered broken bones and concussions.

Michigan law already prohibits the possession and release of certain Asian carp species, including the silver carp.¹ In addition, the Great Lakes States have been working with the U.S. Army Corps of Engineers to complete the Asian carp electric barrier in the Chicago Sanitary and Ship Canal. But these efforts would prove useless if silver carp and largescale silver carp enter the Great Lakes after being imported or transported over state lines.

¹ Part 413, Transgenic and Non-Native Organisms, of the Natural Resources and Environmental Protection Act, Mich. Comp. Laws §324.41301 *et seq.*

Dr. Roger Helms

Page 2

I encourage you to act quickly. If these species of Asian carp enter the Great Lakes and establish a population, it will be impossible to eradicate them. The ecological and economic stakes for Michigan — and the entire Great Lakes Region — are extremely high.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Mike Cox". The signature is fluid and cursive, with the first name "Mike" being more prominent than the last name "Cox".

Mike Cox
Attorney General