

Thank you for your comment, Scot Duncan.

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GLMRIS

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Comment Submitted:

Just when I thought I could stop carping about the Asian carp, someone sent me a copy of Michael Scott's Cleveland Plain Dealer article from March 12 about a new Life Science Investigation for middle school students. Scott's article is at [http://blog.cleveland.com/metro/2011/03/bad\\_carp\\_good\\_algae\\_and\\_ugly\\_u.html](http://blog.cleveland.com/metro/2011/03/bad_carp_good_algae_and_ugly_u.html) and the LSI program can be found at <http://wviz.org/lsi>. The program contains eight video segments and a number of links that teachers can give to the students for additional research. It is an exceptionally thorough piece of work by the Great Lakes Science Center and WVIZ.

In light of the two recent Ontario convictions for attempted importation of Asian carp at the Bluewater and Ambassador bridges, it's clear that live Asian carp were transported through the Great Lakes watershed by truck. One of the convicted importers owns a fish farm in Peru, Indiana, which is within about 25 miles of the Lake Erie watershed.

The Army Corps has acknowledged that feral Asian Carp are in the Wabash watershed within 25 miles of the upper limits of the neighboring Maumee watershed. There is a valid concern for a transfer between the watersheds in the case of flooding. However, there had been no mention of fish farm operations in the area. The owner of the Indiana fish farm arrested at the Canadian border has told reporters that the fish were trucked from a southern United States fish farm. <http://blogs.wlfi.com/2011/03/08/illegal-in-carp-shipment-netted-in-canada/>.

The federal law governing the import of "injurious fish" into the United States is the Lacey Act. However, the Lacey Act does not regulate intrastate transfers unless the receiving state has regulations in place that criminalize live fish possession. The Lacey act has recently been updated to include the Big Head carp but is widely regarded as too little too late. While it prohibits importation, it does little to regulate interstate transport since few states have laws against live Asian carp possession.

In 2007, The Asian Carp Working Group, consisting of 66 government employees and other interested parties, generated a report identifying 22 "pathways" for introduction of the Asian carp into the Great Lakes. The Working Group roster indicates that Ohio was not represented. The Working Group's 223 page report identified a myriad of introduction opportunities and clarified that totally preventing introduction may be next to impossible. The report can be read at [http://www.asiancarp.org/documents/Carps\\_Management\\_Plan.pdf](http://www.asiancarp.org/documents/Carps_Management_Plan.pdf).

The latest Control Strategy Matrix (Jan 2011) includes 33 million dollars of requested funding and is online at: <http://asiancarp.org/wp-content/uploads/2011/01/2011-Matrix-Dec30.pdf>.

After reviewing the on-line information, I am convinced that, unless all of the Great Lakes states simply ban possession of live Asian Carp in the same manner that Ontario has, the Asian carp will eventually enter the Great Lakes. Ontario's position is clearly and unequivocally stated in their law. You simply cannot possess live Asian carp anywhere in the Province for any reason. We should promulgate similar laws in Ohio and in the other Great Lakes states.

Clearly, Ohio's Lake Erie estuaries, such as Sandusky Bay, Old Woman Creek, East Harbor, and the many Black Swamp marshes will become ground zero for the propagation of the Asian carp if they make it to Lake Erie waters.

In the 1880's, the Federal Government intentionally introduced imported German carp to Lake Erie to compensate for over-fishing of the native stocks. In a span of 130 years the German carp of 1880 became the "common carp" of today. The effects of

“common carp” on our ecosystem are discussed in Video 5 of the Public Television/Great Lakes Science Center middle school video series referenced in the first paragraph of this posting. <http://wviz.org/lsi/interior>

If possession of live Asian carp is not banned throughout the Great Lakes region, they seem destined to become the “common carp” of 2111. It is clear that no one knows for sure what damage these fish can cause. I don’t think we want to find out and I see no upside to letting them in without putting up a good fight.

I urge government action to address all of the potential introduction pathways and not just the Chicago River connections on which the Army Corps of Engineers has focused to date.