



# Council of Great Lakes Fishery Agencies

REPRESENTING THE FISHERY AGENCIES OF THE GREAT LAKES BASIN

1854 TREATY AUTHORITY

CHIPPEWA-OTTAWA  
RESOURCE AUTHORITY

DEPT. OF FISHERIES  
AND OCEANS, CANADA

GREAT LAKES INDIAN  
FISH AND WILDLIFE  
COMMISSION

ILLINOIS DNR

INDIANA DNR

MICHIGAN DNR

MINNESOTA DNR

NATIONAL OCEANIC  
& ATMOSPHERIC  
ADMINISTRATION

NEW YORK DEC

OHIO DNR

ONTARIO MNR

PENNSYLVANIA F&BC

U.S. FISH & WILDLIFE  
SERVICE

U.S. GEOLOGICAL SURVEY

WISCONSIN DNR

May 10, 2019

Charles F. Sykes, Director  
Division of Wildlife and Freshwater Fisheries  
64 North Union St., Suite 567  
Montgomery, AL 36104

Dear Director Sykes:

The Council of Great Lakes Fishery Agencies, a group of executive administrators from fishery management and science agencies in the Great Lakes basin, request your assistance in addressing a non-native species threat to North American waterways and freshwater fisheries. Specifically, we urge you to prevent further introduction and stocking of diploid grass carp in your state. We acknowledge that grass carp are an effective agent for biological control of nuisance aquatic vegetation, but established breeding populations in unintended waters can damage valuable natural resources.

Diploid grass carp have been captured in the Great Lakes basin, despite state or provincial regulations that either stipulate the introduction of only triploid (sterile) grass carp or that strictly prohibit the entry or stocking of any grass carp. Over 80% of recent grass carp captures from Lake Erie are diploid. Evidence of reproduction in its tributaries has spurred international concern about potential impacts on vegetated habitats and associated fish production if they become established and spread throughout the Great Lakes. Currently, over \$1 million is being spent annually to evaluate and manage the grass carp threat in Lake Erie, and a formal 5-year adaptive response strategy for grass carp has been adopted by all fishery management agencies in that lake. Elsewhere in the Great Lakes basin, extensive and costly surveillance efforts for this invader are being undertaken. Our goal is to prevent further introductions of any diploid grass carp.

Efforts to exclude diploid grass carp from the Great Lakes basin or other waters are compromised by two factors: 1) the availability of diploid fish at lower costs (wholesale and retail) than triploid fish, and 2) movements of stocked diploid fish into unintended waters. Private fish farms, which raise both diploid and triploid grass carp ostensibly for shipment and stocking in states where grass carp can be used legally to control aquatic vegetation, are the primary source for the introduction of diploid and triploid grass carp in the Great Lakes. However, the higher retail cost of triploid fish creates a fiscal incentive for some consumers to buy and stock the less expensive diploid grass carp, even in areas where diploid grass carp are prohibited, e.g., the Great Lakes basin. Moreover, stocked grass carp readily move into waters that are (or become) hydrologically connected, regardless of jurisdictional boundaries. We propose that restricting the availability of diploid fish for stocking is much more feasible (logistically and economically) than attempting to remove or block free-swimming fish in connected waterways. Therefore, we urge all states that currently allow sale and stocking of diploid grass carp to eliminate the lawful availability of these fish.

Our request is consistent with a recommendation to the Mississippi Interstate Cooperative Resource Association (MICRA) that *"All states prohibit the production, sale, live shipment, stocking, import, and export of diploid grass carp except for permitted diploid brood stock at appropriately licensed production facilities"* from their contracted 2015 study *"The use of grass carp (Ctenopharyngodon idella) in the United States: production, triploid certification, shipping, regulation, and stocking recommendations for reducing spread throughout the United States"* (available at <http://www.micrarivers.org.php7-35.lan3-1.websitetestlink.com/wp-content/uploads/2018/04/final-micra-grass-carp-report-web.pdf>).

In closing, we contend that the Great Lakes and other valuable and treasured water bodies of North America can be protected from the damaging impacts of invasive grass carp without adversely affecting an aquaculture industry that is already marketing triploid fish. Accordingly, we ask that you support the efforts of the Great Lakes states to protect their aquatic and fishery resources from further expansion and invasion of grass carp by (a) designating "diploid grass carp" as a prohibited aquatic invasive species in your state, (b) replacing "grass carp" with "triploid grass carp" as an approved aquaculture species, and (c) permitting "certified triploid grass carp only" for stocking and live food fish sales.

Thank you for your time and consideration of this important issue.

On behalf of the Council,



William P. Mattes  
Chair, Council of Great Lakes Fishery Agencies

Cc: Mr. Nick Nichols, Fish Chief  
Division of Wildlife and Freshwater Fisheries  
64 North Union St.; Suite 567  
Montgomery, AL 36104



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WISCONSIN DNR

May 10, 2019

Dr. Sam Polles, Executive Director  
Mississippi Dept. of Wildlife, Fisheries, and Parks  
1505 Eastover Drive  
Jackson, MS 39211-6373

Dear Director Polles:

The Council of Great Lakes Fishery Agencies, a group of executive administrators from fishery management and science agencies in the Great Lakes basin, request your assistance in addressing a non-native species threat to North American waterways and freshwater fisheries. Specifically, we urge you to prevent further introduction and stocking of diploid grass carp in your state. We acknowledge that grass carp are an effective agent for biological control of nuisance aquatic vegetation, but established breeding populations in unintended waters can damage valuable natural resources.

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Thank you for your time and consideration of this important issue.

On behalf of the Council,



William P. Mattes  
Chair, Council of Great Lakes Fishery Agencies

Cc: Mr. Larry Pugh, Fish Chief  
Mississippi Dept. of Wildlife, Fisheries, and Parks  
1505 Eastover Drive  
Jackson, MS 39211-6374



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May 10, 2019

Sara Parker Pauley, Director  
Missouri Department of Conservation  
2901 West Truman Blvd.  
PO Box 180  
Jefferson City, Missouri 65102

Dear Director Pauley:

The Council of Great Lakes Fishery Agencies, a group of executive administrators from fishery management and science agencies in the Great Lakes basin, request your assistance in addressing a non-native species threat to North American waterways and freshwater fisheries. Specifically, we urge you to prevent further introduction and stocking of diploid grass carp in your state. We acknowledge that grass carp are an effective agent for biological control of nuisance aquatic vegetation, but established breeding populations in unintended waters can damage valuable natural resources.

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Thank you for your time and consideration of this important issue.

On behalf of the Council,



William P. Mattes  
Chair, Council of Great Lakes Fishery Agencies

Cc: Mr. Brian Canaday, Fish Chief  
Missouri Department of Conservation  
2901 West Truman Blvd.  
PO Box 180  
Jefferson City, Missouri 65102



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WISCONSIN DNR

May 10, 2019

Dale L. Garner, Ph.D. | Division Administrator  
Conservation and Recreation Division  
Iowa Department of Natural Resources  
502 E. 9th St., Des Moines, IA 50319  
P 515-725-8494 | F 515-725-8201

Dear Director Garner:

The Council of Great Lakes Fishery Agencies, a group of executive administrators from fishery management and science agencies in the Great Lakes basin, request your assistance in addressing a non-native species threat to North American waterways and freshwater fisheries. Specifically, we urge you to prevent further introduction and stocking of diploid grass carp in your state. We acknowledge that grass carp are an effective agent for biological control of nuisance aquatic vegetation, but established breeding populations in unintended waters can damage valuable natural resources.

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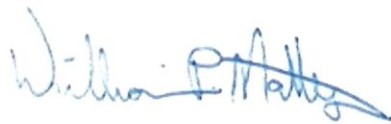
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Thank you for your time and consideration of this important issue.

On behalf of the Council,



William P. Mattes  
Chair, Council of Great Lakes Fishery Agencies

Cc: Mr. Joe Larscheid  
Iowa Department of Natural Resources  
502 E. 9th St.  
Des Moines, IA 50319





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WISCONSIN DNR

May 10, 2019

Mr. James N. Douglas, Director  
Nebraska Game and Parks Commission  
2200 North 33rd  
Lincoln, NE 68503

Dear Director Douglas:

The Council of Great Lakes Fishery Agencies, a group of executive administrators from fishery management and science agencies in the Great Lakes basin, request your assistance in addressing a non-native species threat to North American waterways and freshwater fisheries. Specifically, we urge you to prevent further introduction and stocking of diploid grass carp in your state. We acknowledge that grass carp are an effective agent for biological control of nuisance aquatic vegetation, but established breeding populations in unintended waters can damage valuable natural resources.

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Thank you for your time and consideration of this important issue.

On behalf of the Council,

A handwritten signature in blue ink, appearing to read "William P. Mattes". The signature is fluid and cursive, with a long horizontal stroke at the end.

William P. Mattes  
Chair, Council of Great Lakes Fishery Agencies

Cc: Mr. Dean Rosenthal, Fish Chief  
Nebraska Game and Parks Commission  
2200 North 33<sup>rd</sup>  
P.O. Box 30370  
Lincoln, NE 68503



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WISCONSIN DNR

May 10, 2019

Director Pat Fitts  
Arkansas Game and Fish Commission  
2 Natural Resources Drive  
Little Rock, AR, 72205

Dear Director Fitts:

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On behalf of the Council,



William P. Mattes  
Chair, Council of Great Lakes Fishery Agencies

Cc: Mr. Ben Batten, Fish Chief  
Arkansas Game and Fish Commission  
2 Natural Resources Drive  
Little Rock, AR, 72205