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Mr. Everett Wilson, Chief
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Re: Injurious Wildlife Species; Black Carp (*Mylopharyngodon piceus*); Availability of Draft Environmental Assessment and Draft Economic Analysis
August 30, 2005 *Federal Register*, Proposed rule, reopening of comment period

The Nature Conservancy offers these comments in response to the U.S. Fish and Wildlife Service's (FWS) reopening of the comment period and availability of supplemental information regarding the proposed rule to add all forms of live black carp to the list of injurious fish, mollusks, and crustaceans under the Lacey Act. The Nature Conservancy has been a long-standing supporter of the addition of all forms of live black carp, including triploid carp, and these comments supplement our earlier submitted comments on both the Advance Notice of Proposed Rulemaking dated August 1, 2000 and on the Proposed Rule, dated September 30, 2002. We strongly urge FWS to recognize all forms of live black carp as injurious and to add them to the list of injurious fish under the Lacey Act. We urge the Service to reject utilization of an alternative listing only diploid (fertile) forms. Finally, we urge FWS to acknowledge the overwhelming scientific and economic data demonstrating significant consequence if any form of live black carp is allowed to be utilized.

Black carp have the potential to be a devastating invasive species in rivers and lakes around the nation, particularly in the Great Lakes. Invasive species are one of the greatest threats to biodiversity around the world, and are the second-greatest threat to listed threatened and endangered species in the United States (Wilcove et al., *BioScience* 1998). Preventing invasive species is the best way to protect native biodiversity and also the most cost effective option. The U.S. Fish and Wildlife Service must be ready to act rapidly to stop an injurious species from establishing or spreading. Unfortunately to date, the listing process for the black carp has taken an unacceptably long time: more than a decade since the time first proposed. Meanwhile, accidental or purposeful introductions to the wild from fish farms and other impoundments have continued to occur. The Nature Conservancy's experience in Arkansas includes repeated release of Asian carp from the aquaculture facilities that are located on floodplains of rivers tributary to the Mississippi. (Richard Sparks, Director of Research, National Great Rivers Research and Education Center, Godfrey, IL, personal communication). The inevitability of these introductions was highlighted recently with the devastation wrought by Hurricane Katrina, a storm which destroyed many catfish farms and flooded acres of land in the Southeast.

We strongly urge FWS to reject the alternative allowing use of triploid fish. Risks posed by black carp are not alleviated if the use of triploid fish is still permitted. First, the standard method, Coulter Counter, used by aquaculture industries is imperfect and likely to result in introductions in the wild (USGS 2003). Additionally, we note that fish hatcheries that produce the triploid carp currently maintain fertile diploid carp for breeding. Second, the introduction of even triploid fish may result in reproduction in the wild: the Columbia Environmental Science Center has preliminary research documenting successful fertilization by a triploid male carp of a diploid female carp. Third, certification schemes to verify that fish at a particular facility or used in import are triploid are expensive and difficult to enforce, with implications on the efficacy of any certification method utilized. Finally, even sterile escaped individuals of the black carp species have the propensity to negatively affect vulnerable wild species, given the carp species' long life span and dietary habits.

Comments on Draft Environmental Assessment

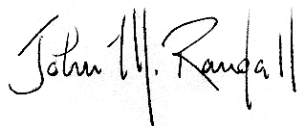
The serious environmental risks associated with black carp have been previously commented upon, and we believe the Draft Environmental Assessment portrays these risks accurately. However, we urge FWS to additionally incorporate recent peer reviewed science such as Nico et al's book "Black Carp: Biological Synopsis and Risk Assessment of an Introduced Fish" into its Draft Environmental Assessment.

Comments on Draft Economic Assessment

Generally speaking, the expected costs associated with the introduction of the black carp into the wild will grossly outweigh the costs to the aquaculture industry in utilizing other available alternatives to control trematodes. We are particularly concerned that use of triploid species, if allowed, would create substantial new burdens on states and taxpayers through the imposition of rigorous certification schemes and necessary increases in state and federal enforcement. Finally, we encourage FWS to include consideration of the wide range of fish diseases and parasites carried by black carp, and publish any data regarding likely economic consequences for both wildlife and humans.

In conclusion, The Nature Conservancy urges the Fish and Wildlife Service to add all forms of live black carp to the list of injurious wildlife under the Lacey Act as quickly as possible.

Sincerely,

A handwritten signature in black ink that reads "John M. Randall". The signature is written in a cursive, slightly slanted style.

John M. Randall, Ph.D.
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