

**From:** [REDACTED]

**Sent:** Monday, June 30, 2025 6:46 PM

**To:** [infoquality@fws.gov](mailto:infoquality@fws.gov) <[infoquality@fws.gov](mailto:infoquality@fws.gov)>; Information Quality, GS-GIO <[InfoQual@usgs.gov](mailto:InfoQual@usgs.gov)>

**Subject:** [EXTERNAL] Request for Correction under Information Quality Guidelines - Invasive Carp Messaging Omissions

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To Whom It May Concern,

I am submitting this request for correction under the [U.S. Fish and Wildlife Service / U.S. Geological Survey] Information Quality Guidelines.

This request pertains to agency communications and public-facing materials regarding invasive carp control. Specifically, I contend that both [USFWS/USGS] have disseminated incomplete and potentially misleading information by omitting the well-supported scientific connection between nutrient enrichment and invasive Asian Carp recruitment. This omission downplays a critical causal factor in population dynamics and prevents the public, policymakers, and partner agencies from pursuing effective prevention strategies.

Peer-reviewed research, including work funded by federal agencies, demonstrates that eutrophic backwaters provide ideal conditions for Asian Carp larval survival and recruitment. However, this relationship is not reflected in official agency guidance, public web content, or outreach materials. The result is a distorted understanding of the problem and misplaced emphasis on commercial harvest strategies that do not address the root cause.

This omission has direct public policy consequences, including the misallocation of funding and failure to meet nutrient reduction and ecosystem restoration objectives. I respectfully request that your agency formally acknowledge the nutrient-recruitment link in future communications and revise relevant materials accordingly.

Attached is a white paper and an oversight complaint submitted to the Department of the Interior Office of Inspector General [REDACTED] which provide additional background and references supporting this request.

Please confirm receipt and advise of any additional procedural steps.

Sincerely,

[REDACTED]

## **Oversight Documentation**

### **Nutrient Pollution, Asian Carp Recruitment, and Agency Omission**

**Submitted by:** [REDACTED]

**Date:** June 10<sup>th</sup> 2025

#### **Summary**

This complaint requests a formal investigation into systemic mismanagement by the U.S. Fish and Wildlife Service (USFWS) and U.S. Geological Survey (USGS), specifically their ongoing failure to incorporate established ecological science linking nutrient pollution to invasive carp recruitment into publicly funded programs. This failure has allowed mass recruitment events to continue unchecked in nutrient-rich backwaters, particularly in the Illinois River, while management efforts remain narrowly focused on adult removal and barriers.

The omission has undermined federal invasive species strategy and placed significant economic risk on downstream communities. In western Kentucky alone, Asian Carp threaten a tourism economy valued at over one billion dollars annually, supporting more than 12,000 jobs. The same scientific gaps also affect native fisheries, public trust, and the credibility of conservation programs funded through the Department of the Interior.

Despite repeated efforts to communicate these concerns through formal channels, agency responses have ranged from dismissive to silent, while peer-reviewed science and internal agency quotes confirm the central ecological connection in question. These omissions must be examined to ensure transparency, fiscal responsibility, and ecological accountability moving forward.

#### **Key Email Evidence (Selected Excerpts)**

1. [REDACTED] (USGS):  
"We have also been modeling carp and management actions and basically, the results show that without doing something to depress the early life stages, there is little human intervention will do (with our current management plans which are typically increasing take and sometimes an attempt at a barrier)."
2. [REDACTED] (USGS):  
"High nutrient levels (in part from farms and also due to discharges from Chicago) are important parts of the carp productivity in the Illinois River... the geomorphology and hydrograph... result in extremely high populations..."
3. [REDACTED] (USFWS):  
"I did not get a reply to my earlier email out to the group and just reached out again... There isn't currently that support for addressing algae in backwaters. I wouldn't be

surprised if it got support at some point down the road, but it doesn't seem that the time is now."

4. [REDACTED] (USFWS):

"There is no doubt that there are excess nutrients in the water in many locations and that invasive carp are thriving in many of these locations."

5. [REDACTED] (USGS):

"I've been pushing working on limiting access for recruitment habitats as a control method for more than a decade."

6. [REDACTED] (USFWS):

"Will always do my best to be true to the science and do what's right. I hope that never changes."

**Scientific Foundation: Nutrient-Driven Recruitment** My own outreach to agency and state officials across 11 states confirms that confirmed Asian Carp nurseries are rare. In most cases, state agencies reported only incidental sightings of young-of-year fish, with very few locations confirmed as active larval growth zones. This suggests a manageable number of predictable nursery areas, presenting a unique opportunity for targeted and cost-effective intervention.

The ecological link between nutrient pollution and Asian Carp proliferation is based on the foundational principle of carrying capacity. High nutrient loads from agricultural runoff create algal blooms and elevated phytoplankton densities, particularly in backwater and floodplain habitats. These blooms coincide with larval drift periods, forming nursery environments that drastically increase larval survival and recruitment success. This feedback loop has not been integrated into federal strategies or messaging.

Mass recruitment events are repeatedly observed in nutrient-rich areas such as the Illinois River, while nutrient-poor systems show minimal recruitment despite having adequate flow and spawning conditions.

Multiple peer-reviewed studies and personal communications with agency biologists confirm the correlation, yet strategic actions remain narrowly focused on adult removal and barriers.

Numerous studies also support the basic ecological premise that nutrient enrichment from nitrogen and phosphorus runoff leads to increased algal productivity, particularly in freshwater systems. These blooms not only elevate carrying capacity for larval-stage filter feeders like Asian Carp but also shape the zooplankton community structure that supports their survival.

**Contact History Summary**

- ██████████ (USGS), multiple emails and call ignored
- ██████████ (USGS), multiple emails and call ignored
- ██████████ (USFWS), email ignored
- ██████████ (USGS), both phone and email communication
- ██████████ (USGS), both phone and email communication
- ██████████ (USFWS), both phone and email communication
- ██████████ (USFWS), email ignored

**Remedy Requested**

I respectfully request that the Department of the Interior Office of Inspector General initiate a formal investigation into whether USFWS and USGS have knowingly or negligently failed to incorporate nutrient-recruitment science into Asian Carp management.

If verified, I ask that agencies be directed to publicly acknowledge the nutrient link, revise strategies to include larval-stage recruitment prevention through algae control and habitat-based interventions, and initiate targeted research and pilot programs to evaluate the effectiveness of these strategies under real-world conditions, including the seasonal deployment of standalone ultrasonic units and, where appropriate, selective use of environmentally safe algicides in confirmed nursery backwaters. These approaches represent low-cost, low-regret options that could reduce larval survival without relying solely on large-scale harvest or barrier infrastructure.

Further, a public awareness initiative should be launched to educate stakeholders, including agricultural partners, about the role of nutrient runoff in facilitating invasive species recruitment. This matter involves the integrity of public funding, scientific transparency, and the long-term sustainability of native aquatic ecosystems.

**Contact:**

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Phone: ██████████

Email: ██████████

### **Additional Note on References**

The following sources support the ecological foundation, agency communications, and policy gaps referenced in this complaint. Each study reinforces either the nutrient- recruitment link, the role of nursery habitat, or the documented awareness of agency officials.

### **References**

- Barshinger, E. C., et al. (2024). Natal origins of invasive Silver Carp in the Lower Mississippi River. *Transactions of the American Fisheries Society*.
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- George, A. E., Chapman, D. C., & Deters, J. E. (2018). Behavioral ontogeny of larval Silver Carp (*Hypophthalmichthys molitrix*). *Journal of Fish Biology*, 92(6), 1897–1912.
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- Norman, J. D., & Whitley, G. W. (2015). Recruitment sources of Silver Carp in the Illinois River. *North American Journal of Fisheries Management*, 35(1), 1–10.
- Parkos, J. J., Chick, J. H., & McClelland, M. A. (2023). Density-dependent reproductive output in invasive Silver Carp. *Ecological Applications*.
- Sass, G. G., Cook, T. R., Irons, K. S., & McClelland, M. A. (2014). Long-term response of a river fish community to the invasion of Silver Carp. *Ecological Applications*, 24(2), 453–467.

# **White Paper: Strategic Implications of Asian Carp Management and Omission of Nutrient-Driven Recruitment**

**Author:** [REDACTED]

**Date:** June 28<sup>th</sup>, 2025

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## **Executive Summary**

This white paper explores the possibility that certain patterns of omission and management framing around Asian Carp recruitment may reflect deeper strategic motives, particularly involving commercial exploitation and nutrient pollution concealment. The ecological science connecting nutrient enrichment and Asian Carp larval recruitment is well established, yet federal and state agencies have not acted accordingly. The potential reasons for this include economic incentives, political risk aversion, and unacknowledged environmental dependencies.

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### **1. Commercial Fishing Incentivization of an Invasive Species**

Federal and state programs, particularly in Illinois, have promoted the harvest of Asian Carp as a commercial and economic opportunity. This has resulted in significant investments in:

- Processing facilities and branding efforts (e.g., "SilverFin & Copi").
- State subsidies and harvest incentives.
- Job creation narratives in economically challenged rural areas.

However, commercial nets are designed to allow juvenile carp to escape, ensuring fish reach market size. This results in a population structure that perpetuates itself:

- Juvenile carp are protected unintentionally by gear selectivity.
- Recruitment prevention is not prioritized.
- The invasive species is reframed as a renewable fishery resource.

This strategy encourages biomass maintenance rather than ecosystem restoration and obscures the necessity of nutrient-based prevention.

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### **2. Illinois' Quiet Benefit from Asian Carp: Buffering Harmful Algal Blooms (HABs)**

Illinois contributes among the highest nutrient loads to the Mississippi River Basin. Since the mid-1990s, nutrient loads from some watersheds have risen by more than 40% (USGS). Given this, Asian Carp may inadvertently serve as a biological buffer by consuming:

- Suspended phytoplankton and algal biomass.
- Nutrient-driven primary productivity that would otherwise feed HABs.

Potential benefits to Illinois of maintaining dense carp populations:

- Suppression of HAB outbreaks in visible recreational waters.
- Reduction in pressure from the EPA regarding nutrient compliance.
- Political cover from agricultural runoff scrutiny.

Without these filter feeders, Illinois' rivers might face intensified regulatory and public backlash. This creates a perverse incentive to keep Asian Carp populations viable.

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### **3. Risk Aversion and Narrative Control**

Acknowledging the nutrient-recruitment link and these dynamics would require:

- Rethinking agency messaging and strategy priorities.
- Addressing potential past negligence.
- Shifting funding from harvest to prevention.

It may also:

- Trigger Congressional scrutiny or legal review.
- Disrupt cross-state agency cooperation.
- Undermine the perceived effectiveness of existing programs.

By not addressing these issues, agencies avoid accountability and retain narrative control.

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### **4. Public Trust and Personal Reflection**

For a decade, I have advocated for ecologically sound solutions to the Asian Carp crisis, long before many agencies acknowledged the scale of the threat. In that time, I've experienced repeated stonewalling, delayed responses, and disregard for basic ecological

evidence that links nutrient pollution to larval recruitment. This has had a cumulative effect, not just on policy outcomes, but on public trust.

When agencies promote commercial harvest while ignoring root causes, when they omit nutrient links from public materials despite internal acknowledgment, and when citizens are forced to escalate simple truths to federal oversight bodies, it undermines faith in the institutions meant to protect our waters.

This paper was written not out of bitterness, but out of conviction. Science is not just data, it is a moral contract with the public to tell the full story. My hope is that by surfacing these deeper dynamics, we can re-center management strategies on ecological integrity and transparency, not economic expedience.

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## **Conclusion**

This white paper does not assert malicious intent but highlights how complex policy, economic interest, and ecological science intersect. It is essential to:

- Investigate agency strategy omissions.
- Consider the consequences of commercializing an invasive species.
- Recognize the political calculus surrounding nutrient pollution.

A shift in framing is urgently needed, from managing symptoms to confronting causes. Nutrient pollution, larval survival, and carrying capacity remain core ecological levers in invasive species control. Ignoring them only ensures the persistence of the problem under new, more politically convenient names.