



# United States Department of the Interior

U. S. GEOLOGICAL SURVEY

Reston, VA 20192

In Reply Refer To:  
Mail Stop 423  
ER 11/1165

**FEB 17 2012**

Mr. David Wethington, Project Manager  
USACE Chicago District  
111 N. Canal, Suite 600  
Chicago, Illinois 60606

Subject: Great Lakes and Mississippi River Interbasin Study (GLMRIS) for the Aquatic Nuisance Species of Concern-Chicago Area Waterway System

Dear Mr. Wethington:

As requested by the U.S. Department of the Interior, Office of Environmental Policy and Compliance, in their correspondence of December 21, 2011, the U.S. Geological Survey (USGS) has reviewed the subject environmental assessment (EA) and offers the following comments.

## COMMENTS

**Pg. 7, Table 1:** The species *Ctenopharyngodon idella* (grass carp) is not listed in Table 1. The grass carp is currently established in the Mississippi River, and individuals have been captured in Lake Erie, as have individual bighead carp. The threat of grass carp is comparable to the threat of bighead and silver carp. We recommend that grass carp be added as a potential invasive species.

**Appendix B4:** The statement "Not persistent and degrades rapidly under acidic conditions" seems irrelevant because both the Great Lakes (GL) and Mississippi River systems are not typically acidic. The pH of the GL is typically around 8 and the Mississippi River probably similar. Rivers frequently are more acidic than lakes but the Mississippi River is generally not considered acidic. We suggest the statement be removed from the Final EA.

**Appendix B-6:** Sodium hydroxide has no Targeted Organism of concern-CAWS. We suggest that the Final EA indicate which organisms might be eliminated by sodium hydroxide, or the status of understanding about the organisms that could be controlled.

**Appendix B-7:** In the Introduced Predatory Insect Species, no column is checked. We suggest the Final EA identify a Targeted Organism of concern-CAWS.

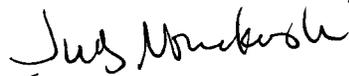
**Appendix B-12:** The effectiveness of Antimycin varies considerably with the degree of degradation in the commercial formulation. Research has shown that Antimycin is more toxic than rotenone to bighead and silver carp; however, the differences during field applications may

not be as pronounced. We suggest the Final EA include text describing the degradation and effectiveness issues.

**Appendix B-12:** The document does not include Niclosamide as a potential molluscicide. It is registered for use in control of snails in catfish ponds, and could be registered for other molluscicidal uses if desired. Its geographic use is not limited to the GL basin: it has been used in Hawaii and elsewhere in the U.S. for snail control. We suggest that Niclosamide be included in the Final EA.

Thank you for the opportunity to review and comment on the DEIS. If you have any questions concerning our comments, please contact Gary LeCain, USGS Coordinator for Environmental Document Reviews, at (303) 236-1475 or at [gdleca@usgs.gov](mailto:gdleca@usgs.gov)

Sincerely,



 James F. Devine  
Senior Advisor for Science Applications

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