

Comment from Congressional Sportsmen's Foundation

The is a Comment on the **Fish and Wildlife Service (FWS)** Proposed Rule: **Migratory Bird Permits: Management of Conflicts Associated with Double-Crested Cormorants (Phalacrocorax auritus) Throughout the United States**

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Comment

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Attachments (1)

[CSF Comments on Cormorant Proposed Rule](#)

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July 20, 2020

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U.S. Fish and Wildlife Service
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RE: **Docket No. FWS-HQ-MB-2019-0103**

Dear Mr. Ford:

On behalf of the Congressional Sportsmen's Foundation, I am writing to express our support for the proposed rule to establish a new permit for state and federally recognized tribal wildlife agencies for the management of double-crested cormorants (cormorants). Additionally, we support expanding this new permit to allow for the states to assist private landowners with cormorant depredation issues on private lakes and ponds when appropriate. Finally, we strongly support the re-establishment of an Aquaculture Depredation Order, listed as Alternative B in the Draft Environmental Impact Statement (EIS), to allow commercial aquaculture operations to effectively address cormorant predation issues in a timelier manner.

As noted in the 2003 Double-crested Cormorant Management in the United States EIS, as well as the 2020 Draft EIS: Management of Conflicts Associated with Double-Crested Cormorants, the expansion over the last several decades in both the population size and range of the cormorant is well documented. Even with prior general depredation orders and numerous site-specific lethal-take permits, the population continues to grow, and prior lethal-take management actions had no detrimental impacts on populations. The increase in cormorant abundance and distribution is likely an artifact of increasing forage availability through the extensive construction of reservoirs for hydropower, irrigation, and water supply across the country, as well as the expansion of aquaculture facilities to meet the growing demand for sustainable protein as the U.S. and world populations increase. To reduce depredation at commercial aquaculture facilities and on recreationally important fisheries, both public and private, targeted management options that include lethal take are necessary to mitigate the impacts of artificially inflated cormorant populations in the U.S.

We strongly support the targeted, science-based approach of managing cormorant populations according to the proposed Potential Take Level (PTL), which is guided by estimates of population abundance, to ensure cormorant harvest levels necessary to achieve management objectives do not exceed sustainable levels. This

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method of limiting the removal of individuals to a conservative threshold based on routinely updated population estimates has been effective for decades in managing other species, such as commercial fisheries in federal waters. The PTL will ensure accountability with cormorant management, both for the resources being impacted by their growing abundance, as well as the long-term health of the cormorant populations across the nation.

It is because of the use of the proposed PTL management approach that we believe there should be a new Aquaculture Depredation Order, along with expanded flexibility in the proposed state and tribal permits to assist private landowners with cormorant conflicts, in order to maximize the effectiveness of cormorant conflict management across states and regions as needs shift over time. By allocating a specific take allowance to individual states and tribes combined with reporting requirements to ensure cormorant removals remain within acceptable limits, cormorant management can address a broad range of challenges in a timely manner while ensuring the population of cormorants remains healthy and sustainable.

Furthermore, utilizing public hunters, at little to no cost and with the necessary sideboards, has proven to be a cost-efficient option for population control where wildlife-human conflicts occur with other species. As the data regarding estimates of cormorant population abundance and harvest efforts become more robust over time under the new PTL management approach, we encourage the future consideration of using hunters as a management tool to achieve state and regional management goals. Providing limited hunting opportunities on specific waterbodies during the fall and winter when depredation impacts on wild and publicly stocked fish are at their highest could prove much more effective and strategic in reducing cormorant impacts on local fisheries.

In closing, we support the proposed rule to establish a new permit for state and federally recognized tribal wildlife agencies for the management of cormorants. We also urge you to include increased flexibility for the states and tribes to assist with management of cormorants on private waters, as well as implementing a new Aquaculture Depredation Order, all of which can and should be managed under a region and state specific PTL.

Sincerely,



Chris Horton

Senior Director, Midwestern States/Fisheries Policy