

Submitted Electronically via eRulemaking Portal

This 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**

For related information, [Open Docket Folder](#)

Comment

Please find attached comments submitted by the Georgia Department of Natural Resources, Wildlife Resources Division on Docket FWS-HQ-MB-2019-0103 Management of Conflicts Associated with Double-Crested Cormorants.

Attachments (1)

[Docket FWS-HQ-MB-2019-0103_WRD Comments](#)

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July 10, 2020

Public Comments Processing
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RE: Docket No. FWS-HQ-MB-2019-0103

The Georgia Department of Natural Resources, Wildlife Resources Division (WRD) greatly appreciates the opportunity to review and comment on the U.S. Fish and Wildlife Service (USFWS) Proposed Rule for Management of Conflicts with Double-Crested Cormorants (DCCO; Docket FWS-HQ-MB-2020-0103, hereafter Proposed Rule) posted in the Federal Register on June 5, 2020. We support the Proposed Rule that establishes a special DCCO permit for States and Tribes and offer the following comments.

DCCO currently pose a considerable threat to fish production and intensively managed fish populations in Georgia. WRD manages 10 fish production hatcheries and 11 Public Fishing Areas (PFAs) throughout the state. DCCO frequently feed and roost on these areas during winter. DCCO consume substantial amounts of fish that are produced and stocked for conservation purposes. WRD has maintained records of DCCO sightings on its areas since 2017.

The impact DCCO can have on aquaculture production has been understood for some time. Eight of the 10 fish hatcheries operated by WRD utilize open pond culture to raise sportfish. Non-lethal control methods are impractical or ineffective at controlling DCCO impacts at these facilities. DCCO become habituated to persistent, affordable methods (e.g., noise making deterrents, lasers, harassment from shore by hatchery personnel) and the size of some hatcheries makes other methods difficult or too expensive to implement. The current level of take allowed by the USFWS at state-managed hatcheries under the permit system is inadequate. Allowing for an increased, but ecologically sustainable, level of lethal control under the Proposed Rule would be beneficial for Georgia's aquatic resources.

The 11 PFAs operated by WRD include more than 135 small impoundments and 2,140 surface acres of water. These areas are managed to create quality fishing opportunities for the anglers of Georgia. The economic investment on these areas includes stocking hatchery raised forage and sportfish, fertilization of water bodies, and management actions to enhance opportunities for anglers.

During the 2018-2019 wintering season, more than 16,500 DCCO sightings were reported during variable length observation periods across 200 noncontinuous days by staff on these PFAs. According to the 2003 USFWS Final Environmental Impact Statement on Double-crested Cormorants each bird can consume over 1 pound of fish each day. While the impact DCCO can have on free-swimming populations of fish is difficult to estimate, this record of

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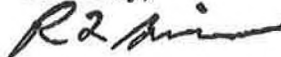
sightings of DCCO demonstrates a measure of exposure. Many of the fish in these waterbodies are produced on WRD fish hatcheries and represent a sizable economic investment. The 2003 USFWS Final Environmental Impact Statement on Double-crested Cormorants describes DCCO as opportunistic feeders with variable diets reflecting local fish populations. DCCO tend to congregate in areas with high concentrations of fish that are easily preyed upon such as PFAs and hatcheries. Our monitoring of DCCO supports this characterization of feeding behavior. Losing thousands of pounds of fish to DCCO predation is an expensive and unsustainable impact limiting our ability to provide the quality of fishery desired by our customers.

The Proposed Rule provides the ability to effectively and efficiently mitigate cormorant impacts to fisheries on state aquaculture facilities and managed fisheries. We offer the following considerations and recommendations with respect to the Proposed Rule:

- The Proposed Rule provides no indication concerning how cormorant depredation issues on private waters in states will be dealt with or regulated. Under the Proposed Rule, what will be the expectations for state agencies with regards to permitting, monitoring, and reporting requirements on waters managed by private landowners?
- We recommend the USFWS provide an outline of a cormorant population monitoring regime as a foundation for current consideration by stakeholders and as the basis for stakeholder meetings with the USFWS following the publication of the record of decision.
- We request the USFWS include an allowance for issuing a permit to reduce conflicts when cormorants detrimentally impact species defined as those of Greatest Conservation Need in approved State Wildlife Action Plans.
- We recommend the USFWS provide detailed criteria regarding the annual reporting requirements.

We encourage the Service to promptly issue a favorable record of decision that mitigates detrimental impacts to aquaculture and fishery resources occurring under the current rules. Again, thank you for the opportunity to comment on the Proposed Rule and provide input for thoughtful consideration on this important issue.

Sincerely,



Rusty Garrison

cc: Ted Will
John Bowers
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Alan Isler
Thom Litts