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Comment from Kalmiopsis Audubon Society

Posted by the **Fish and Wildlife Service** on Jul 20, 2020

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Comment

See attached file(s)

Attachments 1



KAS to USFWS re DCCO rule_7.19.2020



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Document ID

FWS-HQ-MB-2019-0103-2278



Tracking Number

kct-oisr-3j6p

Document Details

Submitter Info

Document Subtype

Comment(s)

Received Date

Jul 19, 2020

Page Count

1



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KALMIOPSIS AUDUBON SOCIETY

P.O. Box 1265 • Port Orford OR • 97465

To: U.S. Fish and Wildlife Service

Re: Opposition to proposed rule pertaining to Management of Conflicts Associated with Double-crested Cormorants

Date: July 18, 2020

Submitted via: <https://beta.regulations.gov/comment/FWS-HQ-MB-2019-0103-1411>

Greetings. We are writing on behalf of the Kalmiopsis Audubon Society. Our organization has more than 400 members on the Southern Oregon Coast who are deeply concerned about birds, fish, and wildlife. Our members enjoy watching and observing three species of native cormorants—Pelagic, Brandt's and Double Crested-- that live and breed in colonies in our region. We appreciate their sleek black plumage, their gregarious behavior, and their impressive prowess in diving for fish, which are their primary food. These birds are uniquely adapted to the environments where they live.

For this reason, we would like to express our strong opposition to the U.S. Fish and Wildlife Service's proposed rule which would allow the annual killing of up to 124,157 federally protected Double-crested Cormorants nationwide. This proposal would allow the killing of almost 9,000 cormorants in the Western United States, where populations are already at risk due to previous mismanagement by the Service (USFWS).

We also strongly oppose the U.S. Fish and Wildlife Service's related proposal to delegate responsibility for overseeing the killing of Double-crested Cormorants to States. At the state level, wildlife officials are under considerable pressure to ignore science, even their own research, and instead bow to private interests and political pressure on how to treat Double-crested Cormorants.

We are disappointed that the USFWS has repeatedly failed to meet its responsibility to protect this often-scapegoated species. Double-crested Cormorants have become one of the most

persecuted wild birds in the United States. This proposal continues that pattern. In 2016, Federal Courts found that the U.S. Fish and Wildlife Service had illegally allowed the killing of more than 180,000 cormorants east of the Rocky Mountains. During this same time period the U.S. Fish and Wildlife Service also permitted the killing of nearly 11,000 cormorants and the destruction of more than 28,000 nests in the Columbia River Estuary. This action resulted in the complete collapse of this colony, representing 40% of the entire Double-crested Cormorant population west of the Rocky Mountains! We urge the USFWS to take a more holistic and humane approach.

At the local level we know best, Oregon's Department of Fish and Wildlife (ODFW) found that cormorants on the Southern Oregon Coast likely accounted for the loss of no more than 2% of the overall salmon run, yet fishermen continually pressure ODFW to kill or at least haze cormorants along the estuaries. This in spite of the fact that the number of local breeding pairs of Double-crested Cormorants has decreased from an average of 416 pairs a year during the period from 1979-1992 to 241 breeding pairs during 2003-2018. There is considerable evidence that pollution, decreased quality of spawning areas, and warming temperatures of rivers—all due to human activity—contribute far more to the decrease in salmon reproductive success than cormorants eating habits. However, we've observed that it is much easier to blame Double-crested Cormorants for fishery problems, and therefore resort to poorly rationalized lethal control projects rather than address fundamental ecosystem issues that have been identified by experts, including wildlife scientists employed by Federal and State agencies. We've even heard local fishermen spread misinformation that DCCO are invasive species!

As we see it, the proposal to allow the killing over 123,000 Double-crested Cormorants annually violates the Migratory Bird Treaty Act, which mandates that the agency conserve, protect and enhance fish, wildlife and plants and their habitats for the continuing benefit of the American people protect native bird species. The Migratory Bird Treaty Act also mandates that the agency only allow killing if it can ensure the continued viability of the species, which this proposal neglects to do. This proposal also fails to take into account other critical issues such as:

- adequate consideration of alternative non-lethal controls
- risks to non-target species
- ethics of killing so many birds in potentially inhumane ways
- adequate monitoring to ensure that significant population declines do not occur
- risks of lead ammunition

Finally, delegating to states the authority to decide if killing Double-crested Cormorants should be allowed is an abdication of a core responsibility of the USFWS. Such a move would put management of cormorants in the hands of state agencies that lack both resources and expertise, are subject to pressure from local private interests, and in many cases have explicitly expressed a desire to see even more aggressive control of cormorants than has been allowed to date by USFWS.

For all these reasons, we think the proposal being put forth by the U.S. Fish and Wildlife Service is unjustified. We urge you to abandon this proposal and adopt the **No Action Alternative**.

Thank you for considering our comments.

Sincerely,

/s/Ann Vileisis, Kalmiopsis Audubon, President

/s/Deborah Buitron, PhD., Kalmiopsis Audubon, Rogue River cormorant issue chairperson