

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

Attached please see the comment letter from the Mid-Columbia Public Utility Districts on the proposed rule for double-crested cormorants.

Attachments (1)

[Mid-C PUD comments on Proposed Rule for Management of Cormorants 7-20-2020](#)

View Attachment:



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July 20, 2020

Jerome Ford
U.S. Fish and Wildlife Service
Department of the Interior
Leesburg Pike, Falls Church, VA 22041-3803

Submitted via www.regulations.gov. Attn: FWS-HQ- MB-2019-0103

Re: Docket Numbers: FWS-HQ-MB-2019-0103, Proposed Rule, Migratory Bird Permits:
Management of Conflicts Associated with Double-Crested Cormorants throughout the United States

Dear Mr. Ford:

The Public Utility Districts of Chelan (Chelan PUD), Douglas (Douglas PUD), and Grant (Grant PUD), (hereafter referred to as the Mid-Columbia PUDs) each own and operate hydroelectric projects on the Mid-Columbia River on the behalf of the citizens of our respective counties. The Mid-Columbia PUDs appreciate this opportunity to comment on the Double Crested Cormorant Draft Environmental Impact Statement (DEIS). We support the preferred alternative (Alternative A) which allows other entities such as Washington state or recognized tribes to secure depredation permits for the take of double-crested cormorants. Equally important to the Mid-Columbia PUDs is to also ensure that current depredation permits for take of double-crested cormorant continue to be issued to the Department of Agriculture's Wildlife Services branch under 50 CFR § 21.41, as population levels allow. For the Mid-Columbia PUDs, maintaining the double crested cormorant depredation permits is necessary in the event the other entities do not request their own take permits through the preferred, or any other, alternative presented in the DEIS.

The Mid-Columbia PUDs, through diligent work, have made great strides over the last 30 years in restoring, enhancing and protecting salmon and steelhead runs in the middle and upper Columbia River basin. This has occurred through significant investments and operational adjustments to protect the fisheries resource. Our actions have also resulted in fulfilling the various regulatory and legal requirements that govern the operation of our respective hydroelectric projects. We take great pride in the substantial improvements benefiting the Columbia River's anadromous fishery resource.

Since 2013, the Mid-Columbia PUDs have participated in the Inland Avian Predation Work Group (IAPWG) established by the U.S. Army Corps of Engineers per the original and supplemental

Biological Opinions as summarized in the Inland Avian Predation Management Plan Environmental Assessment (USACE 2014). The focus of the IAPWG was to help guide management actions for Caspian tern predation on steelhead and salmon smolts in the inland portions of the Columbia River. Through participation in the IAPWG, we've learned that double-crested cormorant population numbers are on the rise, as is their predation rate on salmon and steelhead smolts.

In the DEIS, the U.S. Fish and Wildlife Service ("USFWS") acknowledges an increase in double-crested cormorant population, coupled with a range expansion. Depredation permits from the USFWS are essential to manage the effects of increased double-crested cormorant populations on migrating salmon and steelhead smolts. While the Mid-Columbia PUDs appreciate the challenge the USFWS has in balancing the protection of double-crested cormorants under the Migratory Bird Treaty Act, as hydropower project operators on the Columbia River with requirements for salmon and steelhead survival through our projects, we also see the need to manage cormorants to help meet established recovery goals for salmon and steelhead listed under the Endangered Species Act (ESA).

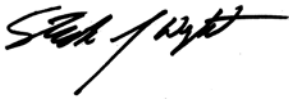
While cormorant numbers in the Mid-Columbia Region may not be high relative to the Columbia River Estuary counts, studies have shown that cormorants have the highest predation rates per capita among all piscivorous birds that inhabit the Mid-Columbia Region (Parish 2006). Chelan County PUD has recovered thousands of PIT tags from migrating smolts that were deposited on a series of islands in the Mid-Columbia where double-crested cormorants roost throughout the year. The number of tags recovered only represent a fraction of the smolts consumed by double-crested cormorants in this colony. Similarly, there are nesting colonies of double-crested cormorants at the mouth of the Okanogan River, adjacent to the Wells Hydroelectric Project managed by Douglas County PUD, and in the Potholes Reservoir, adjacent to the Wanapum and Priest Rapids Hydroelectric Projects managed by Grant County PUD. Each of these double crested cormorant colonies is a source of predation on migrating salmon and steelhead smolts, for approximately 145 miles along the Mid-Columbia PUDs' hydroelectric projects on the Columbia River.

In addition to predation issues for migration salmon and steelhead smolts, the increase in double-crested cormorant numbers in the Mid-Columbia region poses a risk to the Mid-Columbia PUDs electric delivery system. As double-crested cormorants continue to move inland and their numbers increase, they create roosting and nesting colonies. In the arid environment along the Mid-Columbia, distribution and transmission lines are used for perching, nesting, and roosting. The congregation of large water-birds like double-crested cormorants on transmission or distribution lines poses a significant risk to both the double-crested cormorants and the electric infrastructure. Depredation permits are necessary to keep double-crested cormorants from roosting and nesting on the electric infrastructure to reduce the risk to the Mid-Columbia PUDs electric infrastructure, maintain reliability of the system, and to manage double-crested cormorant impacts on smolts.

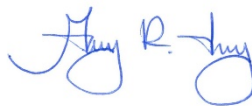
Conclusion

The Mid-Columbia PUDs appreciate the opportunity to comment on the DEIS and support USFWS' efforts to address increasing double-crested cormorant population number and predation rates, particularly on ESA listed salmon and steelhead smolts. Through the implementation of USFWS' preferred alternative (Alternative A) in the DEIS, Washington State and recognized Tribes could participate in a double-crested depredation program to manage cormorants at hatcheries located up and down the Columbia River and its tributaries. Through this alternative, a larger, more comprehensive double-crested depredation program can be administered by the USFWS while monitoring double-crested cormorant population levels. However, in case the State of Washington or recognized Tribes choose not to participate in any alternative approved in the DEIS, we maintain that double-crested cormorant depredation permits at 50 CFR § 21.41 should persist and remain available so the Mid-Columbia PUDs can manage double-crested cormorants to reduce smolt predation and protect our electrical infrastructure at a local level.

Sincerely,



Steve Wright
General Manager
Chelan County PUD



Gary Ivory
General Manager
Douglas County PUD



Kevin Nordt
General Manager
Grant County PUD