



MISSOURI DEPARTMENT OF CONSERVATION

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SARA PARKER PAULEY, Director

July 16, 2020

Public Comments Processing
Attn: FWS-HQ-MB-2019-0103
U.S. Fish and Wildlife Service Headquarters
MS: PRB (JAO/3W)
5275 Leesburg Pike
Falls Church, VA 22041-3803

To Whom It May Concern:

Thank you for the opportunity to comment on the U.S. Fish and Wildlife Service's (USFWS) draft Environmental Assessment and proposed rule concerning management of conflicts associated with double-crested cormorant (*Phalacrocorax auritus*) throughout the United States.

The Missouri Department of Conservation (MDC) supports Alternative A (preferred alternative) which would establish a new permit option under 50 CFR part 21 (special double-crested cormorant permit) that would be available to state and tribal wildlife agencies in the 48 contiguous United States to manage conflicts specifically associated with double-crested cormorants on state or tribal-managed lands. MDC owns or operates five cold-water and four warm-water fish hatcheries that produce more than 4.5 million fish per year. These hatcheries not only support our state's great fisheries resources but also contribute toward restoring many imperiled aquatic species, including lake and pallid sturgeon populations in the Missouri and Mississippi Rivers. Although we do not anticipate a high level of participation in use of the new special permit, we do view it as a management option that should be available to States and Tribes if nonlethal methods to control conflict with cormorants are unsuccessful.

We recognize the challenge and sensitivity inherent in seeking to balance cormorant populations that are sustainable and resilient to stressors and yet result in minimal conflicts with "wild and stocked fisheries, aquaculture facilities, human health and safety, property and threatened and endangered species." We support the USFWS's efforts to set forth rules that tackle this contentious issue by offering a reasonable approach toward resolving potential conflicts between cormorants and human interests while maintaining sustainable populations of cormorants such that outcomes are in the best interest of the public and our migratory bird resources.

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Missouri is one of 14 member states of the Mississippi Flyway Council (MFC) and although we are submitting our state-based comments on double-crested cormorants, we work collectively through the MFC and support the MFC position toward cormorant management. As such, we respectfully suggest that all rulemakings be aligned with the meetings, review, and comment processes of the four flyways. Each Flyway Council has a nongame migratory bird technical section that has dealt extensively with cormorant management issues and we strongly encourage the USFWS take full advantage of the biological and policy expertise available through the flyway system.

Once again, thank you for the opportunity to comment on the draft Environmental Assessment and proposed rule regarding the management of conflicts associated with cormorants. We appreciate the efforts to make this a transparent process open to public review and comment.

Sincerely,


SARA PARKER PAULEY
DIRECTOR