

Comment from New York State Fish and Wildlife Management Board

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**

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

Comment

See attached file(s)

Attachments (1)

FWMB Cormorant Ltr

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New York State FISH AND WILDLIFE MANAGEMENT BOARD

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July 20, 2020

The New York State Fish and Wildlife Management Advisory Board welcomes the USFWS DEIS on cormorant management. A permitting process for wildlife agencies to control cormorant populations is extremely necessary and long, long overdue.

While the USFWS states that the DEIS order allows for a liberal take of cormorants, we feel that the New York State Department of Environmental Conservation (NYSDEC) is better qualified to be the final arbiter of the necessary removal numbers. The professionals at DEC have a better understanding of the impacts that the cormorants are having on our resources and, they have a clearer picture of the necessary balancing of cormorant numbers against ecosystem damage.

While allowing lethal control is commendable, the pathway through the required permitting process should not be unnecessarily cumbersome. Redundant documentation could impede the process and yield poor results. There should be a fast, efficient timeline for determining the need for use of lethal controls.

We have seen cormorant numbers increase since the USFWS depredation order was lifted. Harassing cormorants generally moves the problem, it does not provide a real solution. In the long run, excess cormorant populations continue to be destructive and cause more extensive negative impacts.

We feel that NYSDEC should be allowed to determine the best removal methodology, even as to the use of toxic/non-toxic shot, bullets and pellets. Lighter caliber and velocity bullets have a limited tendency to fragment. NYSDEC is also diligent with carcass removal, so exposure to scavengers is limited.

If the oiling of eggs is employed, we feel DEC should be permitted to determine the best products to use. We feel that toxicity will not be an issue because there are a number of alternative products. We believe the process should not be unnecessarily limited.

Knowing that the depredation order worked well; we feel that the permitting process for removals should be built on that process so that the timeline for bringing the population back under control is as short as possible.

While the DEIS order allows for liberal removal of cormorants, we firmly believe that DEC professionals are in the better position to determine the removal rates, based on their on the ground observations and studies.

We urge USFWS to work closely with NYSDEC to create the best possible environment to bring New York's growing cormorant problem under control.

As you undoubtedly will hear repeatedly, the NYSFWMB is not asking to eliminate cormorants from the landscape, we are simply asking that a process is available that efficiently maintains the cormorant population in balance with our environmental and wildlife resources.

William R. Conners

Chairman

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