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July 17, 2020

Public Comments Processing
Attn: FWS-HQ-MB-2019-0103
U.S. Fish and Wildlife Service Headquarters
MS: JAO/1N
5275 Leesburg Pike
Falls Church, VA 22041-3803

Re: Migratory Bird Permits: Management of Double-crested Cormorants
(*Phalacrocorax auritus*) throughout the United States

To Whom It May Concern:

The Fisheries Division of the Oklahoma Department of Wildlife Conservation (ODWC) is pleased to see USFWS is moving forward in the rulemaking process for the depredation of double-crested cormorants. This is an important step for ODWC's state hatchery system, where this species has the potential to cause significant losses to fish production. These hatcheries have had cormorant issues for many years. The use of nonlethal means has not proven to be an effective method of control since losing the ability to acquire depredation permits.

The most recent example of losses comes from the Holdenville State Fish Hatchery. In one season there were two ponds of seven inch catfish. One pond was harvested before the fall cormorant migration and exhibited a greater than 90% return. The second pond was harvested two weeks later when the fish reached required harvest size. The fall cormorant migration had begun a week prior and the birds were undeterred from the pond. After harvesting the pond there was a 50% return, which equates to approximately 20,000 catfish lost to cormorant predation. This is an example of one pond of one species of fish in one season. Extrapolation to our entire hatchery system over the course of many seasons translates to hundreds of thousands of dollars in lost resources.

We have reviewed both the Draft EIS and the Draft Rule. ODWC supports both the proposed level of authorized take and the identified preferred alternative. We appreciate the opportunity to review these documents and to submit comments. If you have any questions, or if I can be of any assistance, please contact me at either (580)762-2248 or ashley.nealis@odwc.ok.gov.

Sincerely,

Ashley Nealis
North Central Region Fisheries Supervisor
Oklahoma Department of Wildlife Conservation
417 S. Silverdale Lane
Ponca City, OK 74604