

Comment from Pro Lake Management LLC

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

After careful review of the proposed rules for take of double crested cormorants I am displeased to see that the private waters have been ignored. Private waters make up a large volume of surface impoundments throughout the US and the management of these waterbodies by landowners has increased in popularity over the past decade. At this time pond and lake owners invest thousands of dollars per surface acre to purchase and manage game fish, forage, habitat, water quality, and aesthetics. This is done to increase recreational opportunity, maximize property value, and to provide a consumable resources.

As a private fisheries biologist and lake manager with one of the largest social media followings in the industry I talk to lake owners from around the country about issues with cormorants weekly. Please understand ignoring private waters will only promote the illegal take of cormorants by landowners. There are very few individuals who would not desire the ability to protect their financial investment legally.

I propose the need to make two amendments to the rules. First the permitted take of double crested cormorants by individual landowners should be added. This should be managed directly by state agencies with requirements for landowners to submit applications and provide take data. This will be the only way to collect accurate data regarding the take to double crested cormorants.

The second amendment to the rules should be the addition of a private industry biologist to future committees creating new regulations for cormorant take. There are several organizations to facilitate the selection of these individuals. This is not a single state issue and should involve scientist who work directly with landowners daily.

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