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The Waterbird Society is an international organization composed of professional biologists and students that specialize in the ecology and conservation of waterbirds. The Society's primary goals include fostering science-based waterbird conservation globally, and facilitating communication between professionals, policy makers and citizens regarding pertinent issues that affect waterbirds. I am submitting the attached letter on behalf of The Waterbird Society, as Chair of its Conservation Committee.

Attachments 1



Comments PRDEIS 2020\_TWBS\_Final



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**Proposed Rule, Migratory Bird Permits: Management of Conflicts Associated with Double-Crested Cormorants (*Phalacrocorax auritus*) Throughout the United States, and the supporting Draft Environmental Impact Statement, Management of Conflicts Associated with Double-Crested Cormorants.**

The Waterbird Society is an international organization composed of professional biologists and students that specialize in the ecology and conservation of waterbirds. The Society's primary goals include fostering science-based waterbird conservation globally, and facilitating communication between professionals, policy makers and citizens regarding pertinent issues that affect waterbirds. In this regard, the Society has an interest in management of the Double-crested Cormorant (*Phalacrocorax auritus*) that has the potential to significantly impact populations of this species.

Below, The Waterbird Society addresses concerns with the proposed action alternatives.

**Poorly defined goals for management with no clear problem statement**

The goal of the USFWS Proposed Rule is “to reduce the number of conflicts with cormorants by combining lethal and nonlethal methods.” However, no definition of what actually comprises a conflict or its root cause (e.g., perceived vs scientifically documented, significant impacts to resources) is provided. Therefore, it is not possible to formulate a degree of confidence in the outcomes of the proposed action alternatives to meet diverse stakeholder values, including the ecological value of cormorants and their importance as part of America’s natural heritage.

**Misunderstanding of the use of adaptive management to solve issue of uncertainty and insufficient data**

Adaptive management involves the testing of management hypotheses via experiments or modeling, and thus improves confidence in cause and effect. Alternative A appears to confuse adaptation with giving managers flexibility to tailor management to local conditions. Although monitoring is required by Alternative A, monitoring does not by itself make management adaptive. With no explicitly stated goals or hypotheses, we have no way to judge that any management under this alternative will be adaptive and thus lead to improved management of cormorants or cormorant-human conflict.

**Conclusions and Recommendations:**

As a scientific society with expertise in Waterbirds, we believe that complex conservation problems cannot be addressed successfully if the management process is not strongly based on a scientific process. This means starting off with clear goals and objectives and either a good understanding of cause and effect or an adaptive management plan to understand it better. The available science indicates DCCO impacts, if they do occur, are likely site- and time-specific. Therefore, we recommend that USFWS should maintain responsibility for management decisions, and make decisions regarding management on a case-by-case, location by location basis. The USFWS should rely on site-specific

scientific study to evaluate conflicts, alleged impacts and potential benefits of any management under consideration. If management is undertaken for DCCO, it should be focused around a clearly defined problem statement and include clear goals, measurable objectives, alternative hypotheses to be tested, and a strong monitoring program for both DCCO and resources being managed for.