



MICHIGAN UNITED *Since 1937* CONSERVATION CLUBS

Uniting Citizens to Conserve, Protect and Enhance Michigan's Natural Resources and Outdoor Heritage
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Public Comments Processing

Attn: Docket No. FWS-HQ-MB-2019-0103-1411

U.S. Fish & Wildlife Service Headquarters

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Falls Church, VA 22041-3803

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Michigan United Conservation Clubs is a 501(c)3, grassroots, conservation organization with more than 200 affiliate clubs and 40,000 members. Our positions on conservation-related topics are derived from our members, and they have established strong support for cormorant control efforts.

This letter conveys the support of Michigan United Conservation Clubs (MUCC), regarding new depredation permits for double-crested cormorants in the central and eastern United States (Docket No. FWS-HQ-MB-2019-0103-1411), which will restore necessary authority for lethal control (depredation) of cormorants.

Michigan United Conservation Clubs is the largest statewide conservation organization in the nation. Founded in 1937, our mission is to unite citizens to conserve, protect and enhance Michigan's natural resources and outdoor heritage. Our membership is a diverse collection of organizations with missions involving conservation of fisheries, wildlife and natural resources, as well as promotion of hunting, fishing and trapping activities. It is in the spirit of that charge that we convey our support for this rule to reinstate authority for effective lethal cormorant control in the Great Lakes region.

Cormorants are a federally regulated fish-eating bird. According to USFWS Environmental Impact Studies, from the early 1970s to 2000 cormorant numbers increased from near zero to 115,000 birds in Michigan waters alone. Surveys suggest that current populations might number between 731,880 and 752,516 in the central and eastern United States.¹ The majority of these cormorants reside at some point in Lake Michigan and Lake Huron. Their diets consist mostly of alewives and round gobies (forage fish) but also significant numbers of stocked trout and salmon fingerlings and highly valued smallmouth bass and yellow perch. Although fisheries of 24 states in the central and eastern United States are affected by cormorant depredations, Michigan hosts about 55% of the interior population's breeding pairs and can be considered "ground zero" for the negative effects of cormorants.

For a variety of reasons, mostly having to do with invasive species, Lakes Huron and Michigan have seen their prey fish populations plummet with drastic consequences to their incredibly important trout and salmon fisheries. In Lake Huron, yellow perch – once a mainstay of the Saginaw Bay fishery – are at record-low numbers. The once legendary Les Cheneaux perch fishery collapsed during the 1990s but was restored by an effective cormorant control program. Research has firmly established the linkage between cormorant predation on fish populations and the decline in their fisheries. The US Fish and

¹ <https://www.fws.gov/migratorybirds/pdf/management/double-crested-cormorants/CormorantEA.pdf>

Wildlife Service (USFWS) recognized this in 2003 and established a Public Resource Depredation Order (PRDO) that provided cormorant control options to the states and the US Department of Agriculture.

Over the last twenty years, MUCC and our membership has continuously supported the need for cormorant control efforts. In 2002, MUCC passed a resolution supporting cormorant control that allows taking of cormorants, eggs and nests in order to significantly reduce the population, and supported removal from list of birds protected by the Migratory Bird Treaty Act. In 2004, MUCC passed a resolution urging the President, Congress, the Secretary of the Interior and USFWS to take the necessary action to provide appropriate funding support for double-crested cormorant control efforts, and to provide appropriate leadership, coordination, control and assessment of those efforts. Implemented over the last 12 years, these measures have been highly successful in reducing cormorant abundance to acceptable numbers and have restored our fisheries.

On May 25, 2016, a U.S. District Court for the District of Columbia ruled that the USFWS had done an inadequate environmental review of ongoing cormorant control efforts, effectively stopping this program that is essential to both the health of Great Lakes fisheries and the aquaculture industry in 24 central and eastern states. Since that time, the USFWS has conducted an environmental assessment that concluded management action was necessary to maintain balance between Great Lakes fisheries and double-crested cormorant populations. Since then, it has become clear that further take must be permitted to achieve management goals – especially relating to populations of wild and public hatchery-stocked fish.

Michigan cannot afford to see more of its diminishing Great Lakes perch and forage fish supplies become prey of rising cormorant numbers, as Michigan's recreational fishing fuels a \$2.3 billion industry.² Furthermore, stocking of trout and salmon can become impractical when cormorant numbers at the stocking sites become excessive. Thus, previous USFWS decisions not to immediately revise the environmental assessment and re-establish depredation orders brings cormorant management to a standstill and threatens many important Great Lakes fish populations and recreational/commercial fisheries. Management of very important, free swimming fisheries in the Great Lakes has come to depend on cormorant control and we object to the abandonment of the Great Lakes states (Michigan in particular) by previous decisions on this topic. MUCC appreciates the addition of these considerations in this proposed rule.

MUCC strongly supports science-based, adaptive management, which in this case calls for a new depredation permit program for double-crested cormorants in the central and eastern United States (Docket No. FWS-HQ-MB-2019-0103-1411). MUCC looks forward to working with the USFWS, in collaboration with the public and the states, to ensure healthy fisheries resources in the Great Lakes.

Sincerely,



Amy Trotter, MUCC Executive Director

² <https://mucc.org/about-us/economic-impact-study-2019/>