



MISSISSIPPI FARM BUREAU® FEDERATION

The Voice of Agriculture®

Mike McCormick
President

March 3, 2020

U.S. Fish and Wildlife Services
Headquarters, MS: JAO/1N
5275 Leesburg Pike
Falls Church, VA 22041-3803

Re: FWS-HQ-MB-2019-0103

To whom it may concern,

On behalf of the Mississippi Farm Bureau Federation (MFBF), I appreciate this opportunity to provide stakeholder input on the Advanced Notice of Proposed Rulemaking (ANPR) “Migratory Bird Permits; Management of Double-Crested Cormorants (DCC) throughout the United States.” Our comments will primarily address issues in Mississippi, which is the largest commercial catfish producing state. Mississippi has approximately 205 operations with 36,300 acres in production with an estimated value of production of \$179 million¹. This is approximately 59 percent of total catfish production in the United States. Annual commercial catfish sales in the United States in 2016 were \$386 million, with an economic contribution of catfish production amounting to \$871.1 million. These figures do not include the contributions of catfish processing, wholesaling or retailing².

In our efforts to prepare these comments, we reviewed the transcript from a previous scoping meeting held in Jackson, Mississippi in May of 2000³. Twenty years later, the concerns then are very much the same concerns we have today. The ever-increasing number of cormorants predateding on catfish is a major concern of the catfish industry. Producers are spending thousands of dollars using non-lethal harassment methods to try to save their stock. According to recent studies by the Southern Region Aquaculture Center, catfish producers spent between \$159 and \$285/acre to harass DCC from their ponds. In Mississippi alone, this amounts to between \$5.7 and \$10.3 million. Cormorants have become increasingly non-respondent to non-lethal techniques and often act as live decoys for migrating cormorants.

MFBF is supportive of individual states receiving the authority to issue depredation permits to producer for lethal take. We were disheartened by the District Court for the District of Columbia’s decision to vacate the previous depredation orders and believed U.S. Fish and Wildlife Services

1 MSU Extension Service and Mississippi Agricultural Statistics Service “2019 Mississippi Agriculture, Forestry, and Natural Resources.”

2 Posades, B.C. “Commercial Catfish Production in the United States.” Mississippi MarketMaker Newsletter, Vol. 7, No. 12, June 20, 2017.

3 “Environmental Impact Statement on Double-Crested Cormorant Management” Public Scoping Meeting. U.S. Fish and Wildlife Services, May 22, 2000. Held at Primos Northgate, Jackson, MS.

(USFWS) performed sufficient analysis to satisfy the NEPA requirements prior to their issuance.

In response to this ANPR, we respectfully request the agency consider the following areas of interest:

Resident Populations – USFWS should look at the increase of DCC becoming year-around predators. These birds, while still migratory by definition, simply do not migrate. Our recommendation would be to allow the oiling of eggs for DCC found nesting in Mississippi. USFWS should allow the lethal taking of DCC depredating catfish ponds, without the need for a permit, during the periods of time when migratory birds are not expected to be present.

Roost Habitat – As you are aware, DCC feces is very acidic and tends to defoliate or kill nest trees and surrounding ground vegetation. USFWS should include the costs associated with the loss of ecologically important and/or sensitive plant species. Because DCC are attracted to areas near water, we are concerned about damage occurring to cypress swamps and bayous where DCC may be roosting.

Socioeconomic Impacts – USFWS should consider the impact of DCC depredation on the entire chain of catfish production. It affects much more than just the farmer and his labor. A single DCC can eat 2.5 lbs. of fish per day. These losses are simply unsustainable and a threat to the industry. In Mississippi, the catfish production occurs in rural areas with few job opportunities. The jobs associated with catfish production, feed mills, and the processing plants offer good paying jobs with benefits. In some areas, the catfish processing facility is the largest employer.

MFBF understands individual farm depredation permits alone are not sufficient to mitigate damage from DCC. We encourage USFWS and USDA APHIS to utilize all techniques at their disposal to manage DCC populations on public grounds and nesting sites. It is evident the increasing population of DCC is having a negative impact on the baitfish in oxbow lakes, state lakes, and locally or community owned ponds and lakes. These impacts should also be included in the analysis of the need for restoring the depredation orders for DCC.

We appreciate USFWS addressing the deficiencies identified by the District Court. While we disagree with the Court's decision, we support the efforts of the agency to conduct the environmental and ecological risk assessments necessary to sustain a legally defensible depredation program.

Sincerely,



Mike McCormick
President