



May 20, 2013

Dear Chair Dingfelder and Members of the Senate Environment and Natural Resources Committee,

I am writing to you on behalf of the Audubon Society of Portland and our 13,000 members in the Portland Metropolitan Area to urge your "no" vote on House Joint Memorial #2 urging the Secretary of the Interior to allow "enhanced management" of cormorants to protect salmon from natural predation. "Enhanced management" in this case is a euphemism for killing large numbers of cormorants (up to 10% of the Oregon population) along the Oregon Coast. Double-crested Cormorants are a federally protected species under the Migratory Bird Treaty Act of 1918.

Audubon is deeply concerned by declines in native salmon populations and has worked to protect and restore native salmon runs. However, we do not believe that this effort is well served by expanding efforts to manipulate and lethally control an expanding web of species that have coexisted with salmon for millennia, a list that now includes, Caspian terns, gulls, sea lions and double-crested cormorants, with discussion of adding additional species on the horizon. We believe efforts would be better focused on expanding efforts to address the core reasons for salmon declines including dam operation, habitat degradation and deteriorating ocean conditions. We recognize that there can be limited circumstances where the strategic, targeted control of one species may be necessary to reduce pressure on another highly imperiled species. However, that is a far cry from what is being contemplated in the Joint Memorial, which would involve population scale manipulation of double-crested cormorants over a large geographic area.

The Joint Memorial is particularly untimely because during 2012 and 2013, ODFW was provided with scientific taking permits by the US Fish and Wildlife Service in order to investigate and document the impact of cormorants on local fish populations at sites along the Oregon Coast. USFWS wisely rejected broader depredation permits because ODFW lacked data regarding the local impacts that were occurring. We believe that this was the right course of action---Cormorant impacts are highly location specific, so without local data, there is no basis for issuing broad depredation permits. USFWS should be applauded, not pressured, for requiring a rigorous scientific basis for broad scale control activities. To do otherwise in our opinion would place USFW in violation of the Migratory Bird Treaty Act. If ODFW wants to control cormorants, it should make the case for why such action is necessary and why it believes such actions will be effective. Such documentation has not yet been produced.

We are particularly concerned in the case of cormorants that that uncoordinated, large-scale lethal control by ODFW could have population level impacts that could result in drastic reductions of west coast populations of double-crested cormorants. The US Army Corps of Engineers is currently developing an EIS addressing salmon predation of double-crested cormorants at the mouth of the Columbia---a nesting population that is, in and of itself, estimated to be the difference between a increasing or decreasing double-crested cormorant population on the West Coast. Potentially adding additional control activities along the rest of the Oregon coast, coupled with already existing efforts to haze cormorants away from nesting areas in both Oregon and Washington and a complete lack of identified sites at which cormorants would be welcomed and allowed to nest in peace, it a recipe for unintended consequences and is inconsistent with sound management of wildlife populations. Large-scale killing of native wildlife should be rigorously justified and evaluated--that has not happened in this case.

Finally, we would note that much of the concern being expressed about salmon predation pertains to hatchery rather than native fish stocks. Killing protected native birds to protect hatchery stock is in our opinion a dubious undertaking and should be evaluated entirely separately from concerns about impacts on wild salmon.

In conclusion, we urge the committee to reject House Joint Memorial #2. It only serves to politicize a debate that should be resolved on its scientific merits. As a matter of maintaining scientific integrity of the process, ensuring wise use of taxpayer dollars, and protecting Oregon's native wildlife populations, including salmon and birds that eat salmon, we believe that politicizing this debate can only serve to undermine the credibility of the process and the efficacy of future management actions.

Thank you for your consideration of our concerns.

Respectfully,

A handwritten signature in black ink that reads "Bob Sallinger". The signature is written in a cursive, slightly slanted style.

Bob Sallinger
Conservation Director
Audubon Society of Portland