

To: Paul Zajicek[paul@thenaa.net]; Jamie Reaser[jamie_reaser@ios.doi.gov]; Hilary Smith[hilary_smith@ios.doi.gov]
From: Cameron, Scott
Sent: 2017-09-22T11:18:59-04:00
Importance: Normal
Subject: Re: Aquaculture Depredation Order and US Fish Farming
Received: 2017-09-22T11:19:36-04:00

Paul,
I get the impression that progress is being made on the EA. Stay tuned.

Thanks,
Scott
Scott J. Cameron
Principal Deputy Assistant Secretary for Policy, Management and Budget
Office of the Secretary of the Interior
Desk 202 208 4242
Cell 202 706 9031

On Wed, Sep 13, 2017 at 6:37 PM, Paul Zajicek <paul@thenaa.net> wrote:

Dear Mr. Cameron:

Thank you for the opportunity to meet this afternoon and discuss aquaculture issues. To follow is a brief summary on the lack of an Aquaculture Depredation Order.

An Aquaculture Depredation Order was created in 1998 under the authority granted by the Migratory Bird Treaty Act to the US Fish and Wildlife Service that allows the USDA Wildlife Services to work with fish farmers in 13 states to implement non-lethal and lethal techniques to deter double-crested cormorants from eating fish grown in ponds.

In October 2014 the Public Employees for Environmental Responsibility filed suit against the FWS that challenged the 2014 extension of two depredation orders that authorize fish farmers and states and tribes, respectively, to manage double-crested cormorants. The challenge was predicated, in part, on an inadequate Environmental Assessment.

In March 2016 the Court granted PEERs' motion for summary judgement and in May 2016 wrote a Memorandum of Opinion noting that Individual Permits could be granted to fish farmers and that the FWS had proposed to prepare an EA in seven months. In December 2016, FWS estimated they would complete a programmatic EA by March or April 2017. At the beginning of August, the FWS was working on a draft.

Given the time required for public comment and agency consideration, we believe that fish farmers will be at-risk and may not have permits or a depredation order for a second winter. As a result, farms will close, jobs will be lost both on and off the farm and high-quality US farmed raised food, bait, or ornamental fish will disappear from the market.

Attached is additional information.

We request that the FWS expedite the EA and Aquaculture Depredation Order, issue Individual Permits immediately or immediately empower the USDA to work with farmers to deter these birds.

Please excuse the informal nature and inevitable typographical errors.

Thank you,

Paul

Paul W. Zajicek

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