



*Bringing back the birds*

## **Migratory Bird Treaty Act Draft Environmental Impact Statement**

**Click here to submit your comment by midnight on July 20:**

<https://www.regulations.gov/document?D=FWS-HQ-MB-2018-0090-8411>

In general, the Draft Environmental Impact Statement (DEIS) does a poor job of analyzing the benefits of the proposed changes, and it did not include an alternative considering incidental take permitting as requested by conservation groups.

According to the DEIS, the preferred alternative (Alternative A) would:

1. Have negative effects on migratory birds, and result in increased bird mortality. Given the three billion bird decline of birds, this policy is a big step in the wrong direction.
2. Decrease implementation of best management practices and industry standards. Some may continue implementation because they are industry best practices, or are compelled by other federal, state, local regulations, or due to public concern.
3. Negatively affect other biological resources and ecosystem services due to increased bird mortality.
4. Increase rate and severity of cumulative anthropogenic effects on birds.
5. Decrease revenue for businesses directly dependent on birds such as hunting, bird watching, guides, and ecotourism.
6. Increased costs for businesses dependent on ecosystem services provided by birds such as seed dispersal and pollination.

Alternative B would restore MBTA protections by rescinding the m-opinion. This would have:

1. Positive effects on migratory birds, reduced mortality, and greater application of best management practices and enforcement.
2. Increase in ecosystem service, and other wildlife, and economic benefits.
3. Likely increase in fines and other adjudications that would be used to benefit migratory birds as a result of enforcement. Habitat protection and restoration from use of fines would likely benefit vegetation and wildlife.
4. Decrease cumulative anthropogenic effects on birds if best practices are broadly implemented.