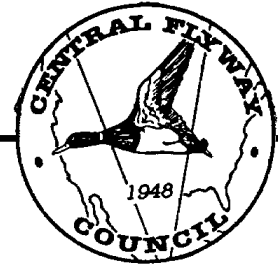


Central Flyway Council

Alberta Kansas Nebraska North Dakota Oklahoma South Dakota Wyoming
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March 23, 2011

Dr. James K. Ringelman, Chair
NAWMP Revision Steering Committee
Ducks Unlimited, Inc.
2525 River Road
Bismarck, ND 58503

Dear Dr. Ringelman:

The Central Flyway Council (Council) would first like to thank the North American Waterfowl Management Plan (NAWMP) Revision Steering Committee (Committee) for allowing us to provide comment and input into the NAWMP Revision process and recognize the challenging task in assimilating input and revising this important document. We also realize that we could have benefitted from this process by having earlier face-to-face discussions with the NAWMP Committee about the various components of the first round of input. Those discussions may have clarified some of our concerns.

Council mostly agrees with the proposed Purpose statement, but offers a couple of modifications. We recommended language regarding waterfowl hunting that substituted “other uses” for the term “desires”. We were not comfortable with the term “desires” and believe “other uses” provides more tangible terminology. Our proposed Purpose statement reads:

“The purpose of the Plan is to sustain North America’s waterfowl populations and their habitats at levels that perpetuate waterfowl hunting and other uses. Plan goals will be accomplished through partnerships guided by sound science”

Council, however, mostly disagrees with the proposed 4 fundamental objectives as proposed by the NAWMP Committee in this second iteration. First, we were somewhat surprised to see 4 fundamental objectives, primarily with the addition of the “viewing objective” (#2). Although we were not privy to all input received, we did not perceive this as an emerging fundamental objective in discussions with peers or input we did access. Indeed, the results presented to us did not even have this listed. While we – and perhaps others – had incorporated non-consumptive language within our “USE” fundamental objective in the initial round of input, we do not support or believe this should have been taken out and made as a separate fundamental objective. It appears that the decision to include a “viewing objective” as a fundamental objective was made somewhat outside of the structured decision making (SDM) process the Revision was structured around.

Council recognizes that there are a substantial number of individuals that view and enjoy waterfowl outside the hunting environment. But in the spirit of SDM, and asking ourselves “why?” in relation to an objective, the apparent answer seems to be “to somehow attract their financial and political support”, rather than the visceral “just because it’s important” one gets from a waterfowl hunting fundamental objective. We have witnessed firsthand the financial and political commitment made by waterfowl hunters to the waterfowl resource without a similar level by the “viewing community”.

We also are reluctant to adopt viewing as a separate fundamental objective because more boardwalks, observation blinds, or ponds in cities and towns that could be considered as obtaining a goal of more or increased viewing opportunities does little to meet population or landscape objectives. The lofty habitat goals set forth in the original NAWMP were largely based on habitat needs to support waterfowl populations desired by hunters. We question whether the “viewing community” needs a landscape that supports 8.8 million mallards. We believe that if habitat and population goals associated with a hunting fundamental objective are met, that a “viewing” fundamental objective will also be met.

Council believes there should be a “use” fundamental objective and that should include a non-consumptive component. We believe the “use” fundamental objectives of the NAWMP should be as that stated by the Council last March as:

USE Objective:

- Sustain or increase the current levels of waterfowl hunter participation under the North American Model of Wildlife Conservation, perpetuate the diverse traditions of waterfowl hunting and provide for non-consumptive uses.

In regards to the above fundamental objective, Council whole-heartedly agrees with a “waterfowl hunter” fundamental objective. However, we believe there is a considerable amount of ambiguity about the proposed fundamental objective (#1) as currently stated. While we applaud the NAWMP Committee for wanting to perpetuate waterfowl hunting, we again refer you to our proposed “Use” objective (see above) as the way of perpetuating it. The waterfowl hunter objective could be met under a “European” system that only allows the rich or privileged to hunt. We do not support that type of system. Again, we urge the NAWMP Committee to consider our proposed USE objective and state that conciseness should not take precedent over clarity.

Central to NAWMP are population and habitat as fundamental objectives. Similar to the Vision statement, we support those as fundamental objectives, but suggest changes in wording. We are not comfortable with the term “desires” and “in harmony”. We do not see these as concrete wording for fundamental objectives that should somewhat easily translate into measurable attributes. We are unsure on the appropriate matrices to measure “harmony”. In further review of those two objectives, we noted that they are not interconnected to each other or with the other objectives, other than parenthetically. We do not agree with that disconnect and again, believe that the stated Habitat and Population objectives (see below) Council proposed last March remain viable. Council’s suggested fundamental objectives are stated as:

HABITAT Objective:

- Maintain or increase the quantity and quality of habitats that are crucial to waterfowl recruitment and survival throughout their annual life cycle to achieve waterfowl population and use objectives.

POPULATION Objective:

- Maintain all waterfowl populations at NAWMP objective levels and for those species without stated objectives, maintain populations at levels necessary to provide for hunting, and non-consumptive uses.

We believe these objectives provide clear, inclusive and integrated objectives that can contain measurable attributes. Again, we emphasize that the need for succinctness should not trump clarity in stating the fundamental objectives of NAWMP.

Council hopes that the Revision leads to increased effort within the Joint Ventures to engage in waterfowl habitat conservation. The expansion of Joint Ventures in terms of both number and scope without commensurate increases in funding for habitat delivery has hindered all habitat conservation efforts by Joint Ventures. We believe action on waterfowl priority areas has been diluted over time due to the addition of other bird conservation activities. The Council strongly supports focusing on priority waterfowl areas. We also hope that this effort leads at least to increased effort within those Joint Ventures most valuable to waterfowl across North America.

Council believes careful and considerable consultation will be needed if this Revision leads to an integration of habitat and harvest objectives and requires a change in or initiation of alternative institutions and processes. There are a number of regulatory responsibilities and processes that would have to be developed and the potential changes may have to be included in the forthcoming Supplemental Environmental Impact Statement on migratory bird hunting.

Sincerely,



John Emmerich, Chair
Central Flyway Council

cc: Central Flyway Council
Central Flyway Technical Committees
Jim Dubovsky, Central Flyway Representative