

**From:** Chutter, Myke FLNR:EX <Myke.Chutter@gov.bc.ca>  
**Sent:** Thursday, August 25, 2011 1:06 PM  
**To:** 'info@nawmprevision.org'  
**Subject:** NAWMP revision comments

I've had a quick look at the draft and am quite impressed with it. Kudo's to all those who have brought it to this stage.

I like the Purpose statement and 3 Goals, however, feel that consideration might be given to changing the order of the 3 goals - as whether intended or not, they suggest a priority.

In my mind, sustaining habitat is the most import issue - without it there are no waterfowl and no hunting or other uses, and maintaining/restoring/creating waterfowl habitat has long been the major focus of NAWMP and the JVs. Hence I would humbly suggest putting the 2nd goal 1st and the 1st goal 2nd - which also happens to flow nicely from their wording.... habitat provides places to recreate; abundant waterfowl support hunting; and increase numbers of waterfowl hunters and wetland conservation (i.e, big picture down the most detailed).

Major challenges will continue to be conserving habitat, addressing declining hunter numbers, and climate change; however another major challenge that probably wasn't issue when the original NAWMP was created is finding ways to deal with overabundant birds (including not only high arctic naturally nesting species like Snow Geese, but also resident Canada geese. The latter requires great coordination between various levels of government, landowners and other stakeholders.

Michael J. Chutter, RPBio  
Provincial Bird Specialist  
Wildlife Management Branch, MoNRO  
PO Box 9338 Stn Prov Govt  
Victoria, BC, V8W 9M1  
Ph: (250) 387-9797  
Fax: (250) 356-9145

Christina Sloop, Ph.D.  
Science Coordinator  
San Francisco Bay Joint Venture  
735 B Center Blvd.  
Fairfax, CA 94930

USFWS Division of Bird Habitat Conservation  
4401 North Fairfax Drive MS4075  
Arlington, VA 22203

Attn: NAWMP Revision Comments

September 19, 2011

Dear NAWMP Plan Committee members,

Overall, I commend the NAWMP Plan Committee's bold vision for change and a more integrated process for waterfowl conservation and management in response to the many related social and environmental challenges ahead. I also support the Plan's urgency for a more collective and streamlined action plan in the face of change and the vision for a holistic approach in reaching the outlined fundamental goals. I applaud the realization that "resource allocation decisions for monitoring, regulatory rule-making, and habitat conservation should flow as part of a comprehensive, coordinated, and prioritized effort rather than from a competitive and opportunistic process." I further agree that utilizing multi-scale approaches, such as life cycle models, will help bring together the various conservation entities and their respective management and conservation foci via an integrated process and action framework.

I am surprised, however, that while embracing a bold agenda for change on one hand, the PC remains very traditional on the other. It is unquestionable that the hunting community has been central in the support of NAWMP and its successes thus far, yet going forward there are new constituents for support that should be considered more boldly in a multi-faceted approach, rather than one that seems single-minded. I very much embrace the idea of incorporating actions in this plan revision to solicit new interest in hunting, yet I disagree with the seeming emphasis on hunting compared to other (rising) human uses of the waterfowl and wetland resource. For example, shrinking numbers of hunters may be part of a natural social evolution that should be weighed directly with the increasing trends in other wetland uses such as bird watching, kayaking, and hiking. While "Nature Deficit Syndrome" is certainly real, young people that do get out to wetland areas may now be more interested in *seeing* and *photographing* the wildlife rather than *hunting* it, and so are also likely interested in *conserving* it! Therefore, I feel the PC has overemphasized the sole importance of hunting and needs to consider such a social paradigm shift in its current vision. This apparent overemphasis is mainly expressed in the purpose statement, and I thus recommend revising it accordingly.

I also feel that the purpose statement: "To sustain North America's waterfowl populations and their habitats at levels that satisfy human desires and perpetuate waterfowl hunting, accomplished through partnerships guided by sound science," does not truly reflect the bold holistic vision described in the plan revision itself. The statement provides too much emphasis on "human desires," a vague expression that leaves room for vast interpretation and so does not allow for clear and focused action. Wetland

systems and waterfowl populations should also be protected for their intrinsic biodiversity value and other ecosystem services they provide (i.e. flood protection, nutrient cycling, primary productivity, other forms of recreation besides hunting). As part of the more holistic vision of wetland habitat preservation presented in the plan revision itself, it should therefore also list other wetland services to humanity. I therefore greatly recommend rephrasing the purpose statement accordingly.

Further, “sound science” is equally vague and could be better described within the context of a clear adaptive management framework. No mention is made of Strategic Habitat Conservation (SHC), a concept that most Joint Ventures (JVs) utilize in implementing conservation delivery. As part of this, the Plan or at least the technical guidelines should further consider exploring the Conservation Measures Partnerships Open Standards planning strategy, a SHC method developed and embraced by many of the leading conservation organizations (i.e. World Wildlife Fund, The Nature Conservancy), and now being implemented worldwide.

Moreover, by working with Flyway Councils, JVs and other entities focused on waterfowl conservation and management in addition to an “all birds” approach, I would also recommend aligning future processes and action plans with other wetland bird conservation initiatives, as all ultimately depend on the same resource – functioning or “healthy” wetlands. Much could be gained in efficiency if all or most wetland-oriented initiatives would share ideas and approaches from the outset. The NAWMP revision is paving the way, and other initiatives should be invited to come along for the attainment of a shared goal of wetland and wetland bird conservation!

I very much appreciate the opportunity to submit my comments to you for consideration.

Sincerely,  
Christina Sloop, Ph.D.  
Science Coordinator, SFBJV

I am very impressed with the obvious thought and effort that has gone into the NAWMP revision. I believe you will find the solid foundation that you have built will be most valuable in leading to the next steps you propose. I would like to provide some thoughts that I hope will be considered.

The prominence of a goal to reduce the decline in hunter numbers may not be the most cost effective means to ensure waterfowl conservation. A fair amount of the human dimensions research indicates that the decline in hunter numbers is in line with a value shift in our nation (see the WAFWA sponsored work by Colorado State University, under Drs. Mike Manfredo and Tara Teel). Reversing a value shift is a nearly impossible task. It seems a transformation in the approach to waterfowl conservation is more likely to be successful (see work by Drs. Dan Decker and Cynthia Jacobson). Your focus on “other conservationists and citizens” is likely to be more effective as we’re seeing wildlife and bird watching numbers increase in line with the value shift.

Your list of primary recommendations is very comprehensive but there seems to be a fundamental recommendation missing. “Actively manage the linkages between waterfowl management and other bird and habitat management” is the missing complement to your internal linkages goal. In a time of decreasing federal funding for conservation, interest in landscape ecology and Landscape Conservation Cooperatives, high-profile all-bird initiatives like State of the Birds, and a shift away from taxa-specific science and conservation, it seems that only looking inward would cause the waterfowl conservation world to miss valuable opportunities to collaboratively advance their efforts—especially as you shift in your key constituents. It seems active engagement in the North American Bird Conservation Initiative and collaboration with organizations active in the other bird conservation initiatives is essential.

I applaud your forward-thinking in creating a Human Dimensions Working Group. I would encourage you to define this working group broadly and bring in those with both the science and practitioner backgrounds related to work with people (i.e., social scientists, educators, communicators, outreach specialists). I would also urge you to find folks who have expertise in working with each of your key audiences (i.e., hunters, other conservationists, and citizens). You may find such people most readily through the Communications and Education teams of the other bird conservation initiatives. I hope the activities of this group will include social science as well as communications planning as well as education, outreach, and communications activities. I hope I will hear about the opportunity to participate as I would be quite interested in doing so.

I also applaud that you are thinking beyond hunters to “other conservationists and citizens”. I would encourage you to agree upon what is really meant by these vague terms. Do you actually mean wildlife and bird watchers, citizen scientists engaged in bird and water quality projects, those who donate to other bird and habitat conservation organizations, those who manage wetlands for wildlife on their own lands??

Submitted by Ashley Dayer (aad86@cornell.edu)



## ATLANTIC FLYWAY COUNCIL

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Ontario	Québec	Nunavut	New Brunswick	Newfoundland & Labrador	Nova Scotia	Prince Edward Island
Maine	New Hampshire	Vermont	Massachusetts	Rhode Island	Connecticut	New York
Pennsylvania	New Jersey	Delaware	Maryland	Virginia	West Virginia	North Carolina
South Carolina	Georgia	Florida	Puerto Rico	Virgin Islands		

September 22, 2011

USFWS Division of Bird Habitat Conservation  
Attn: NAWMP Revision Comments  
4401 North Fairfax Drive MS4075  
Arlington, Virginia 22203

Dear NAWMP Revision Steering Committee:

The Atlantic Flyway Council (AFC) would like to commend the Plan Committee for their work on the North American Waterfowl Management Plan Revision (Revision). In general we support the ideas and directions contained within the Revision. We agree that habitat, waterfowl populations and humans are inseparably linked and that integrating the three is paramount to the future of our endeavour. Since the release of the Joint Task Group report, the AFC has repeatedly been on record in support of the integration of the waterfowl management enterprise. We support the ultimate formation of a Human Dimensions working group, but would urge that the objectives, bounds and working context of this group be defined well in advance of its formation.

We have several reservations about the current draft. One such reservation is the glaring lack of discussion or even mention of the ecology and biological needs of our shared waterfowl resource. This is in stark contrast to past updates and information needs to be included in the final version. The Revision does not in any way instill a sense of inspiration about the waterfowl management enterprise or the resource itself. We find this a bit troubling, particularly if one of the fundamental objectives of the Revision is to recruit new constituents. Further, the Revision seems to target the scientific community rather than the lay person to whom the Revision really wants to include as a partner. Despite the new vision for the Plan, the biology has and always will be at the core of our enterprise. It is the birds and habitats, not the institutions and processes, that concerns our new found constituency.

We also believe more emphasis in the Revision should be given to the past and current accomplishments of the Plan. These accomplishments have been significant and, as we collectively embrace the new challenges ahead and strive to include new partners, our previous successes should be noted.

We recognize that the path forward will be a difficult one, full of uncertainty and with many technical and policy decisions yet to be formulated. In that vein, we look forward to reviewing the forthcoming Action Plan for details on how the Committee envisions implementing the ideas put forth in the Revision. It is not clear, however, whether the Action Plan is to be made available for review in the near term, or if it is a document that will evolve as more consultation on this Revision is conducted.

In support of the Revision, we offer the following general comments for your consideration:

1. We agree with the purpose statement and fundamental goals of the Revision. We offer that from a technical and policy standpoint, the management community is better poised to immediately address the integration of the fundamental goals related to resilient waterfowl populations and sufficient habitat. As knowledge is gained on the human dimensions leg of the stool and objectives and metrics are agreed upon, formal integration of that goal should be pursued. We feel that it is critical however, that progress be made immediately on the formal integration of habitat and harvest objectives.
2. It is imperative that, as we move forward with integration, the process and product be as transparent and understandable as possible. Without clear transparency, given the very technical nature of the proposed path, buy in from the waterfowl management community will be difficult if not impossible for all but a few of our most technically savvy constituents.
3. The Revision clearly implores the waterfowl management community to embrace and engage a new constituency (e.g., non-hunters) to shoulder much of the political and financial burden that our traditional constituency has borne. At least in the United States, far reaching conservation support from non-traditional sources has proven to be an exceedingly difficult proposition. It would be useful for some specific ideas to be discussed within the broader Revision document to provide the management community with a jumping off point for discussion.
4. As we strive to broaden our constituency, it is critically important that we balance the desires of a different advocacy with the existing desires of our traditional base. The hunting tradition is the cornerstone of our enterprise, and hunters should always be at the forefront of our decision making.
5. We agree that the waterfowl management community is at the point where collectively we should be, and are, asking ourselves questions such as "are we doing the right things?" To that end, it may be somewhat premature to be wondering about governance if we are uncertain whether the process we are employing is indeed the correct one.
6. We feel that the greatest challenge facing waterfowl management is the continued erosion of the habitat base resulting from political indifference, habitat alternations and/or actual habitat losses. Shifting budgetary priorities and legislative agendas may result in drastic detrimental changes to the wetlands and associated uplands that our waterfowl resource relies upon.
7. We are in general agreement with the ten steps outlined in the Revision. Again, we eagerly await the proposed timelines and detail that are to be included in the Action Plan. We believe that the Federal agencies will have to commit the necessary resources to bring about the vision outlined in the Plan. Whether this merely entails a change in current priorities and tasks or whether this will require the formation of new institutions remains to be determined.
8. With regards to identifying meaningful measurable attributes we would direct the Plan Committee to the recent Structured Decision Making processes undertaken by various groups within the harvest management community (e.g., black duck and pintail) to inform

fundamental objective #1 (i.e., "Abundant and resilient waterfowl populations to support hunting and other uses without imperiling habitat"). The various NAWMP workshops also identified a number of potential measurable attributes associated with fundamental objective #2 (i.e., "Wetlands and related habitats sufficient to sustain waterfowl populations at desired levels, while providing places to recreate and ecological services that benefit society").

The following comments pertain specifically to Appendix B:

1. The population objective for Atlantic Population (AP) geese is incorrect. The AP Canada goose management plan population objective is a breeding pair index of 225,000 in the Ungava Region of northern Quebec, and 25,000 in the Boreal Forest.
2. The Atlantic Flyway Resident Population (AFRP) of Canada geese is not considered to be comprised of only Giants. In addition, the 2005 Final EIS referred to these geese as Resident Canada geese not Giants.
3. The new AFRP Canada goose population objective is now 700,000, based upon the 2011 AFRP Canada goose management plan adopted at the July AFC meeting.
4. Revisions to the composite estimation of the Eastern Waterfowl Survey Area have resulted in a change in the black duck goal to 830,000.
5. The recently revised Atlantic brant management plan has a population goal of 150,000.

The Atlantic Flyway Council thanks the NAWMP Revision Steering Committee for all of their work throughout the Revision process. A myriad of challenges and obstacles lie between us and the true integration of the waterfowl management enterprise. We look forward to the challenges ahead and offer our continued support throughout this process.

Sincerely,

A handwritten signature in black ink, appearing to read "Dan Forster", written in a cursive style.

Dan Forster, Chair  
Atlantic Flyway Council

cc: Paul Padding



ASSOCIATION of  
FISH & WILDLIFE  
AGENCIES

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The voice of fish and wildlife agencies

Hall of the States  
444 North Capitol Street, NW  
Suite 725 • Washington, D.C. 20001  
Phone: 202-624-7890  
Fax: 202-624-7891  
E-mail: [info@fishwildlife.org](mailto:info@fishwildlife.org)  
[www.fishwildlife.org](http://www.fishwildlife.org)

September 26, 2011

**VIA EMAIL:** [info@nawmprevision.org](mailto:info@nawmprevision.org)

**Attn: NAWMP Revision Comments**

Jerome Ford  
Assistant Director, Migratory Birds  
US Fish and Wildlife Service  
Division of Bird Habitat Conservation  
4401 North Fairfax Drive, MS4075  
Arlington, VA 22203

**RE: Support of Vision and Goals in the North American Waterfowl Management Plan Revision**

The Association of Fish and Wildlife Agencies (AFWA), at its just concluded Annual Meeting in Omaha, endorsed the new vision and goals set forth in the North American Waterfowl Management Plan (NAWMP) Revision. The NAWMP is one of the world's most successful conservation initiatives because of its science-based, partnership-driven, and continent-wide approach to conservation. Like other successful plans, the NAWMP continues to evolve to meet new challenges and capitalize on new opportunities.

The NAWMP Revision reaffirms the Plan's longstanding goals of abundant and resilient waterfowl populations and habitat sufficient to sustain those populations. In addition, the new goal to have growing numbers of waterfowl hunters, conservationists, and other citizens who enjoy and actively support waterfowl and wetland conservation complements the Association's and state agency's focus on the recruitment and retention of hunters and shooters, the development of shooting facilities and the protection and expansion of access for hunting. The Association members unanimously supported the motion to endorse the vision and the three goals of the NAWMP revision.

The Association has long recognized the importance of waterfowl breeding ground habitats and the necessity of managing waterfowl populations and their habitats on a continental basis. In 1991, the Association and its state agency members established an annual goal for states to contribute financially to the conservation of waterfowl breeding ground habitat in Canada. At its Annual Meeting in Omaha, the Association reaffirmed its goal for states to strive to maximize their support in the range of \$10 million per year as U.S. matching funds



for North American Waterfowl Management Plan projects in Canada. The Association also committed to make progress toward achieving the goal by encouraging each state to make an annual contribution based on the state's proportion of active adult waterfowl hunters and duck harvests. Furthermore, the Association will continue to develop a detailed Action Plan to identify ways and means of achieving the \$10 million goal, including but not limited to the following key areas:

- Increasing awareness of NAWMP/NAWCA and effective information sharing,
- Creating innovative funding sources,
- Supporting legislative changes (if needed for states to contribute),
- Increasing hunter awareness and support, and
- Building effective partnerships.

The Association believes that these types of activities will help to improve the understanding of the importance of the NAWMP and to build support from a broader constituency for funding waterfowl habitat projects. The new vision and goals proposed in the NAWMP Revision are fully supported by the Association of Fish and Wildlife Agencies.

Sincerely,



Jonathan Gassett, Ph.D.  
President, AFWA  
and Commissioner, Kentucky Department  
of Fish & Wildlife Resources



Arctic Goose Joint Venture [www.agjv.ca](http://www.agjv.ca)  
Plan conjoint des Oies de l'Arctique [www.pcoa.ca](http://www.pcoa.ca)  
Proyecto Conjunto para el Ganso del Artico [www.gansodelartico.com](http://www.gansodelartico.com)  
c/o #200, 4999-98 Avenue, Edmonton, AB T6B 2X3  
Telephone 780-951-8652 Email [agjv@ec.gc.ca](mailto:agjv@ec.gc.ca)

September 26, 2011

**To: NAWMP Revision Steering Committee**

**From: Arctic Goose Joint Venture Management Board and Technical Committee**

**Re: AGJV Comments on NAWMP Revision Draft**

The Arctic Goose Joint Venture appreciates the opportunity to comment on the draft revision document. Following are some general observations, followed by specific comments for your consideration.

**General observations:**

From our perspective a high level vision document for NAWMP should inspire and engage, not only the people involved in NAWMP, but broader constituents as well. All JVs and all areas of the continent should be able to see themselves in this vision.

The overall view from the AGJV is that there is little in this document that relates to Arctic geese, and little related to northern waterfowl species, northern habitats, and Mexico. It is heavily focused towards mid-continent ducks, with relatively little recognition of other waterfowl, and other areas. The fundamental premise of this revision – integrating harvest and habitat management – is not particularly relevant to Arctic nesting geese.

We support the importance of the third goal, however would like to see it capture broader audiences and provide balance between supporters who hunt and those who support waterfowl conservation even if they do not hunt. Geese are important continentally for both harvest and viewing. First Nations subsistence harvest and harvest related to over-abundant species are important aspects of the human dimension component.

The Arctic may be on the cusp of great change, in terms of climate, transportation, access and development. There is a lack of emphasis on the effects climate change/sea level may have on our ability to manage waterfowl habitats and populations. A forward looking document should acknowledge this to a greater extent.

There is a heavy emphasis on waterfowl hunting - in the vision, the goals, the proposed Human Dimensions Working Group, and the focus on integration. The purpose of integration should be strongly linked to the threats to waterfowl and habitat conservation. While there is certainly no argument from the AGJV that hunting and waterfowl hunters are very important, the emphasis on hunting in this document overshadows the many other threats to waterfowl conservation.

The Plan should address the economic importance of the waterfowl resource and the value added by preserving waterfowl habitat and waterfowl populations. While there is a traditional focus on dollars generated for local economies by hunting, the value of wildlife watching and the improvement to water quality and soil protection via waterfowl conservation efforts should be emphasized, particularly as we reach out to broader constituents.



This Revision draft provides little guidance to the AGJV and it is challenging to see our JV in this document. The Action Plan mentioned in the document will be very important in determining the future of the Plan and the roles of species joint ventures in future integration. We urge the Plan Committee to be even more inclusive in the consultations for the Action Plan.

**Specific comments:**

1. Consider removing "perpetuate waterfowl hunting" from the vision statement as this is included in "human desires".
2. Consider rewording Goal 1 to include "healthy" waterfowl populations, as "abundant" can be misconstrued. Also be more inclusive by rewording "to support many human uses including hunting...".
3. Goal 2: "wetlands and related habitats" does not reflect all important habitats for waterfowl continentally and should be broadened. Also, change "to recreate" to "for recreation".
4. Goal 3: While the goal itself is okay, the Revision's text becomes misdirected toward too large an emphasis on growing hunter numbers while paying less service to the other conservationists. Also of note is that "other conservationists" weren't part of the consultation.
5. Declining hunter numbers is a quantified issue in both the United States and Canada, why is the focus on page 2 and 7 only on the U.S.?
6. The principles for NAWMP (page 9-10) remain valuable, and the modifications are good, particularly the change to #10 as it speaks directly to AGJV business. "primary stakeholders" in #7 could use a definition.
7. Hunter numbers (p. 13 and 14). Is this mostly about duck hunters? The relationship between goose population abundance and hunter numbers may be fundamentally different than the one laid out here for ducks and duck hunters.
8. Appendix B; First paragraph. Concerned about the intent to match population objectives with user demands. With a declining hunter population, this will mean a continuous decline in the number of waterfowl needed to meet demand (populations are already way above that necessary, unless you are allowing for an increase in the individual's demand (e.g., if the current socially accepted level of individual harvest is to be increased as the number of hunters declines). It will be critical to develop measurable hunter objectives, not qualitative objectives such as satisfaction.
9. In Appendix B, the population objective for Atlantic Population (AP) Canada geese is incorrect. The current objective is 225,000 breeding pairs in the Ungava Region of northern Quebec and 25,000 pairs in the Boreal Forest (AP Canada Goose Management Plan, 2008).
10. Page 21, 4<sup>th</sup> paragraph: JVs for habitat and species conservation.
11. p. 25, *Actively manage the linkages within waterfowl management – The linkages among waterfowl populations, habitats and users/supporters are vital to the functioning of our enterprise.* – An example of this approach is the GSG Action Plan 2005-2010 in Québec and in AF GSG management Plan. The objective of the population was determined using variable like carrying capacity, level of crop damage, social tolerance, socio-economic impacts, etc. The objective was well accepted by stakeholders.
12. p.30, does not take into account the surveys done in the Arctic.

In closing, we thank the NAWMP Revision Team for taking on this vitally important undertaking and we look forward to future consultations.

Sincerely,



Mike Johnson  
United States Co-Chair  
AGJV Management Board



David Duncan  
Canada Co-Chair  
AGJV Management Board



September 26, 2011

1931 N. Meacham Rd.  
Suite 100  
Schaumburg, IL  
60173-4360  
  
phone 847.925.8070  
800.248.2862  
fax 847.925.1329  
  
[www.avma.org](http://www.avma.org)

U.S. Fish and Wildlife Service  
Division of Bird Habitat Conservation  
Attn: Draft NAWMP Revision  
4401 North Fairfax Drive  
MS4075  
Arlington, VA 22203

**RE: Docket Number [FWS-R9-MB-2011-N148], North American Waterfowl  
Management Plan**

Dear Sir or Madam:

I am writing on behalf of the American Veterinary Medical Association (AVMA), established in 1863 and the largest veterinary medical association in the world. As a not-for-profit association established to advance the science and art of veterinary medicine, the AVMA is the recognized national voice for the veterinary profession. The association's more than 81,000 members comprise approximately 83% of U.S. veterinarians, who are involved in a myriad of areas of veterinary medical practice including private, corporate, academic, industrial, governmental, military, and public health services.

In response to the solicitation for public comment by the U. S. Fish and Wildlife Service (FWS) on the draft North American Waterfowl Management Plan (NAWMP) Revision, the AVMA is both impressed with aspects of the forward thinking demonstrated by the project developers and disappointed with what seems to be the lack of focus on animal health. The AVMA recognizes the tremendous efforts involved in the extensive re-evaluation of the NAWMP and its resulting Revision. Reshaping the NAWMP into a more integrated program is commendable.

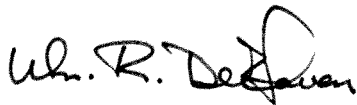
While maintaining healthy waterfowl populations was one of the primary goals discussed during the 2010-2011 NAWMP Consultation Process, this fundamental necessity did not carry over as a primary goal in the Revision. Instead the goals of the Revision were directed to ensure hunting and human enjoyment. As mentioned in the Revision, "healthy populations are a requisite for hunting seasons and other forms of waterfowl-related recreation." The AVMA urges the Agency to include among the Revision's goals a goal specifically addressing the paramount need for fostering healthy waterfowl populations. In addition to being vital for the successful management of these species as well as the hunting programs, including good health of the waterfowl populations as a primary goal of the Revision may attract positive attention from previously uninterested members of the general public, which in turn will benefit the program. Similarly, the AVMA strongly recommends addressing

waterfowl population health issues in the Revision's companion Action Plan, which is still in development.

Veterinarians should be counted among the NAWMP stakeholders. The health of people, animals, and our environment are inextricably interconnected. One Health is the collaborative effort of multiple disciplines-working locally, nationally, and globally – to attain optimal health for people, animals, and our environment. The veterinary profession has the animal health, population health, and public health expertise, all of which are vital to the Revision and the pending Action Plan.

The AVMA appreciates the opportunity to provide comment. For further clarification on the AVMA's comments, please contact Dr. Kristi Henderson at 800-248-2862 ext. 6651, or at [khenderson@avma.org](mailto:khenderson@avma.org).

Sincerely,

A handwritten signature in black ink, appearing to read "W. Ron DeHaven". The signature is fluid and cursive, with a large, stylized initial "W" and "R".

W. Ron DeHaven, DVM, MBA  
CEO and Executive Vice President  
American Veterinary Medical Association





September 26, 2011

To: NAWMP Revision Steering Committee

From: Black Duck Joint Venture Management Board and Technical Committee

**Subject: BDJV Review of the 2012 NAWMP Revision.**

Overall, the BDJV commends and supports the ideas and directions described within the Revision document and in support of the Revision, offer the following comments, on behalf of the Joint Venture for your consideration:

- 1) The introduction focuses on the results of the Prairie-pothole waterfowl survey area and does not recognize the overall contribution of the Eastern Waterfowl Survey to determining the status of waterfowl populations in the east. A more balanced approach in this section would illustrate important continental advances in our monitoring efforts in support of achieving Plan goals.
- 2) In the 2<sup>nd</sup> paragraph of the executive summary, it is mentioned that successive years of good moisture on the breeding grounds may have boosted duck populations. We would like to suggest in addition to the Prairie vision, that in the Northeast (and across the continent as well), beaver populations have doubled over the last 20 years and that it may have helped not only to compensate for habitat loss but also to increase duck populations. These temporary benefits could be lost in north-eastern breeding grounds where Ontario Far North Plan and Quebec Plan Nord may result in up to 50% of habitat loss in the next 25 years.
- 3) The purpose statement describes achieving goals through "partnerships guided by sound science" yet none of the three accompanying goal statements supports that purpose. NAWMP partner agencies as well as Habitat and Species JVs play a role in advancing the scientific underpinnings of the Plan. One of the key roles of species JVs is to support and help develop the scientific basis for species conservation and management. The Vision to secure the future of waterfowl, wetlands should plainly advocate the continued if not added investment in the pursuit of research and monitoring to inform all levels of decision-making.
- 4) NAWMP Joint Ventures include Species and Habitat JVs and we believe it is important to be clear about which JVs are being referenced in the text to avoid any confusion by readers. For example, on page 21, fourth paragraph, the sentence references "*JVs for habitat conservation*" which could be more clearly stated as *Habitat JVs for habitat conservation or JVs for habitat and species conservation*" depending on the original intent of the text.



- 5) On page 23 under "Immediate Interim Adjustments" it is not abundantly clear if Species JVs will be asked to participate on the Integration Technical Team (ITT) or whether only those JVs who have representation on the NSST or HMWG will be involved. Either way, based on the next steps described on pg. 26 and the charge to the ITT, i.e. 3) iii. *revise and integrate continental population and habitat objectives*" we'd suggest that all species JVs be given an opportunity to include technical representation on this ITT body.
- 6) Specific comments which apply to Appendix B:
- a) Figure 1. needs to present *and* describe the EWS
  - b) Table 1. Due to recent corrections to the Eastern Waterfowl Composite estimation process **the American Black Duck (ABDU) goal should be 830,000<sup>1</sup>**
    - <sup>1</sup>The American black duck population objective was developed from predictions of a model relating mid-winter Waterfowl Survey counts to population estimates derived from the Breeding Waterfowl Plot Survey area of eastern Canada (USFWS strata 51, 52, 63, 64, 65, 66, 67, 68, 70, and 71)
  - c) Table 1. The mean ABDU breeding population (2001-2010) is 633,472 and the trend for 1990-2010 is increasing.
  - d) Table 2. Continental breeding population (2001-2010) should be 922<sup>2</sup>. The continental trend (1998-2010) is decreasing.
    - <sup>2</sup>The Continental breeding population estimate is based on the Eastern Waterfowl Survey area and consists of USFWS survey strata 51, 52, 53, 54, 55, 56, 62, 63, 64, 65, 66, 67, 68, 69, 70, and 71.
  - e) Other survey area is 633<sup>3</sup>.
    - <sup>3</sup>The other survey area consists of USFWS strata 51, 52, 63, 64, 65, 66, 67, 68, 70, and 71.

It is abundantly clear that the challenges ahead of the Plan Community are many. To integrate the considerations of habitat, populations and human desires in our decision-making processes will require a sustained investment in the scientific underpinnings of the Plan. Furthermore and perhaps most challenging will be maintaining the levels of investment needed to support both conservation and management actions for waterfowl and habitat into the future.

On behalf of the BDJV, we would like to take this opportunity to thank the NAWMP Revision Writing team for all of their efforts throughout the Revision process and we look forward to the next draft of the Revision and the associated Action Plan.

Sincerely,

Sherry Morgan,  
U.S. Co-Chair, BDJV Management Board

Eleanor Zurbrigg,  
Canadian Co-Chair, BDJV Management Board



**From:** bk1492@aol.com  
**Sent:** Tuesday, August 30, 2011 10:05 AM  
**To:** info@nawmprevision.org; mike\_j.\_johnson@fws.gov; americanvoices@mail.house.gov; president@whitehouse.gov; info@taxpayer.net; media@cagw.org; letters@newsweek.com; today@nbc.com; speakerboehner@mail.house.gov; sf.nancy@mail.house.gov  
**Cc:** info@theteaparty.org; info@taxpayer.net; media@cagw.org; james\_slack@fws.gov  
**Subject:** public comment on federal register - why are ordinary taxpayers paying for hunters to murder birds - shut down this spending entirely Fwd: mgt means killing in usfws language - they deceive the public

this plan is inaccurately named. it should be called a murder document. this venal agency never uses the word killing or murder birds but that is exactly what the entire plan, funded by national general taxpayers who only watch birds, is funding. this needs complete shutdown of this power base that travels all over the country on taxpayer funds to make plans to murder our american birds. what a travesty and complete depravity this plan is.

this plan is no model. it is only a model plan for killing and murdering american birds. this murderous plan shows the depravity of usfws these days. also note that the public comes last in the notices of who should comment. these people don't care or want the public to notice the depravity of their actions. they only write to state agencies, who are also in the murderous business of shooting and murdering birds. what depravity. they only want the tax dollars of the general public, they don't want comment from them or definitely not from any animal protection groups. animal protection groups are completely blackballed by this depraved agency group.

i oppose this bird murdering plan entirely. this group calls it waterfowl "mgt. its complete name is waterfowl killing mgr. they conveniently leave out the truth and all honesty. this is nothing but a scam on the public. a gigantic expensive killing plan paid for by us taxpayers. this funding needs shut down from us taxpayers.

the greatest challenge for the american people is how to shut down this entire insane bird killing plan. american taxpayers do not need and should not spend one dollar on recruiting bird killers, as this plan calls for. Why? why should the general american public, who 99% do not hunt, need to fund and pay for recruiting the brutes who do?

waterfowl conservation needs to consist of bird protection, not murder of birds. this expensive group of corrupt bird murderers got together in 1940, seized power and taxpayer dollars over time and have become the most decadent anti environmental bureaucratic boondoggles in this nation. this bird murdering agency needs to have its entire budget brought to zero. they are a blot on america. THEY WANT TO RECRUIT MINISTERS TO THEIR BIRD KILLING??

GROW EM TO KILL EM IS THE OBJECTIVE OF THIS EXPENSIVE PLAN WHICH TAXPAYERS WERE FORCED TO PAY FOR AND THAT NEEDS TO STOP NOW. THIS PLAN IS DEGENERATE. I DO NOT SUPPORT THIS DEPRAVED PLAN IN ITS OBJECTIVE OF MURDERING BIRDS

THERE IS NO "SOUND" SCIENCE AT THIS GROUP. THERE IS BIASED, SKEWED ALLEGED SCIENCE OPERATING, WHICH ALWAYS PROMOTES MURDERING BIRDS BY GUN WACKO HUNTERS WITH THEIR BLOODLUST FOR KILLING. MOST AMERICANS ARE NOT LIKE THAT.

NAWMP SHOULD BE SHUT DOWN. IT SHOULD BE TAKEN OFF THE GOVT TAB. ITS BUDGET SHOULD BE ZERO. THESE ARE GUYS WHO USE AMERICAN TAX DOLLARS TO TRAIPSE AROUND THE COUNTRY TO FANCY HOTELS, GET THEIR MEALS PAID FOR AND TRAVEL PAID BY ORDINARY WORKING AMERICAN STIFFS. THESE LEACHES DON'T WANT TO LOSE THAT LIFESTYLE THAT THEY HAVE BEEN Coddled ON FOR SO MANY YEARS. BUT ITS TIME.

SHUT DOWN THE ENTIRE BIRD MURDERING BOONDOGGLE THAT HAS BUILT UP IN THIS COUNTRY. THEY LIKE EXISTING ON THE WORKING AMERICANS TAX DOLLARS. THAT NEEDS TO STOP.  
JEAN PUBLIC ADDRESS IF REQUIRED



***1. The greatest challenges facing waterfowl management in the next decade***

The greatest challenge, from a BC Joint Venture perspective, will be securing adequate funding to conserve habitat essential to sustaining waterfowl populations. A traditional source of funding from hunting license surcharges and conservation stamps is dwindling with the decline in hunter numbers in both Canada and the United States. Other sources of traditional conservation funding such as government grants, foundation grants and private donations have also declined with the downturn in the economy. Reductions in traditional funding impact several areas of waterfowl management, including:

- The ability of partners to acquire and conserve new waterfowl habitat, which is being lost at an alarming rate to development and climate change.
- The management and operation of existing waterfowl conservation projects; in BC the infrastructure of early NAWMP projects is now reaching end of lifespan and has to be replaced.
- The scientific research undertaken by JV partners that allows the strategic targeting of conservation activities. Loss of this essential science through funding shortfalls will make the JVs (and therefore NAWMP) far less effective in managing waterfowl habitat

It is necessary to develop new funding streams for waterfowl conservation. Options include tapping into other user groups such as bird watchers. The link between human health and healthy ecosystems also has the potential to mobilize new supporters. A third promising new funding opportunity is the emerging markets for ecosystem services. Wetland and/or grassland carbon credits may provide an opportunity in BC, following the recent emergence of large forest carbon transactions such as Darkwoods.

A second challenge is the on-going lack of policy and regulatory tools to conserve habitat in BC. There are no policies that prevent the loss of wetlands on all lands, and we lack a habitat inventory to implement the policies that do exist (such as the Federal No Net Loss of Wetlands policy). The BC Wetland Stewardship Partnership seeks to advance the policy framework.

***2. The appropriateness and relative importance of the three goals***

**Goal 1: Abundant and resilient waterfowl populations to support hunting and other uses without imperiling habitat**

No Comment.

**Goal 2: Wetlands and related habitats sufficient to sustain waterfowl populations at desired levels, while providing places to recreate and ecological services that benefit society**

Suggested re-wording: **Wetlands and related habitats are sufficient to sustain waterfowl populations at desired levels, while providing ecological services that benefit society, such as recreation opportunities, safe water supply, and flood control.**

**Goal 3: Growing numbers of waterfowl hunters, other conservationists, and citizens who enjoy and actively support waterfowl and wetlands conservation**

Suggested re-wording: **Growing numbers of waterfowl hunters, other conservationists, and citizens who enjoy and actively support the conservation of waterfowl and waterfowl habitat.**

All goals are appropriate, as each goal complements/supports each other.

Suggested re-wording is listed above, in blue.

In Goal 2, ecological services should come before recreation, as recreation is, actually, an ecological service. People concerned about healthy ecosystems represent potential new revenue for the conservation of waterfowl habitat. The link between human health and healthy wetlands/grasslands/forests has the potential to tap into an entirely new market that may not have considered these additional benefits of conservation. Markets for ecosystem services also represent a promising new source of revenue for conservation.

It is important to recognize all waterfowl habitat (vs. just wetlands) in Goal 3. Upland areas are as important for many waterfowl species as wetlands themselves, and provide additional spinoff benefits (see above).

### ***3. The most important, measurable objectives that would serve to accomplish the stated goals, and how to develop these***

Goal 1 Objectives:

1. Sustain populations of waterfowl at NAWMP targets

Goal 2 Objectives:

1. Ensure conservation activities are effectively funded
2. Habitat Joint Ventures continue to work with partners to secure waterfowl habitat for conservation
3. No net loss of waterfowl habitat, particularly wetlands

4. All levels of government are aware and actively supporting wetlands as important for human and environmental health.
5. Climate change impacts on waterfowl habitat is clearly understood and integrated into conservation planning
6. Identify and map continental, national, and regional habitat priorities for waterfowl, and use to inform future allocation of funding.

Goal 3 Objectives:

1. Outreach efforts by conservation partners are actively supported through government, joint ventures and other partners
2. Hunting organizations collaborate with conservation partners (where they are not already)
3. Develop programs that encourage non-consumptive waterfowl uses (i.e. bird-watching) to encourage conservation and bring in revenue
4. Access to areas with different types of uses is readily available across the continent (e.g. hunting, bird-watching, recreation)
5. Better inform the public about the conservation and ecological (including human health) values of NAWCA-funded projects.
6. Campaigns to encourage re-connection with the outdoors and appreciation for nature are regularly held by government and non-government partners

***4. The nature of useful objectives related to recruiting and retaining waterfowl hunters***

Not all BC JV partners are directly involved in this element. Indirect contributions of some partners include improving habitat which results in more birds, and securing new habitat, which can provide hunting opportunities. It is important for all JV partners to recognize that hunting is a contributor of funds for conservation, so it is beneficial to promote ethical and sustainable hunting. Access to lands for hunting near urban centers is important. Limited access for waterfowl hunters is an issue in some urban areas of BC, such as Greater Vancouver. Programs that facilitate hunting access to both public and private lands would be beneficial.

Objectives that relate hunting to healthy food sources is another way to encourage hunting, particularly with urban audiences.

Objectives that create mentorships for new hunters could go a long way to attracting those that are interested in hunting but have no idea where to begin. Urban hunting clubs where people can be paired with a trained, ethical hunting mentor should be encouraged.

***5. The means to engage a broader constituency (i.e. beyond hunters) in the cause of waterfowl conservation***

The Joint Ventures are a good support mechanism for partners who seek to engage a broader constituency. For JV partners whose members are not primarily hunters, an effective method to engage a broader constituency is to change the message focus from waterfowl hunting to the benefits of conserving wetland and upland habitat for human benefit. Everyone has ties to clean water, clean air and to a lesser extent recreation opportunities. Emphasizing the conservation of land/water for ecosystem services not only reaches a broader audience but achieves waterfowl conservation by way of habitat protection.

The corporate sector is another constituency with potential for expanded NAWMP partnership opportunities. For example, the implementation plans prepared by JV's could contain the combined knowledge of all the partners about bird species in the JV area, and thereby become the key bird resource for industries undertaking an environmental impact assessment and/or developing mitigation/compensation (offsets) measures. This would be much more effective and efficient for developers, rather than relying on possibly just one regulatory biologist for information and ideas. This could lead to expanded industrial contributions to JVs and on-the ground waterfowl conservation.

#### ***6. The concept of integrated waterfowl management and the greatest challenges/benefits likely associated with integration***

The CIJV and PCJV already integrate population management and habitat conservation on some level. These JVs have used habitat-species models in the past to look at waterfowl populations to determine what areas are priorities for partners to conserve, either because they support a significant number of waterfowl, or the conservation of the habitat is critical to sustaining populations of waterfowl and the habitat is at risk of being lost.

Each JV within Canada (and the US) operates differently, to varying degrees. Because each JV has unique challenges and different partners, it is difficult to create one "cookie-cutter" structure.

#### ***7. Strategies that would make waterfowl management more efficient, effective and responsive***

No comments.

#### ***8. The necessity of changing or adapting our current institutions in order to implement the new NAWMP and the nature of the changes that may be warranted***

The JVs should work more closely with the Flyway Councils to better align programs and projects.

The BC JVs have created a NAWMP Business Committee that involves those partners who specifically undertake NAWMP activities and are funded by NAWCA. This will allow the JVs to ensure its meeting its NAWMP objectives while keeping with its broader all-bird vision.

NAWCC could also be divisive in this sense – two sub-committees, with one that focuses solely on NAWMP and NAWCA and one that focuses on all-birds (NABCI).

***9. The sufficiency of proposed recommendations and action steps to move this plan forward***

The CIJV and PCJV support the recommendations and next steps to move this plan forward. The bulk of the comments coming from the JVs will likely come from the action plan. Overall this plan has succeeded in creating a broader vision and the process has successfully included a broader suite of opinions from a variety of NAWMP partners.

## **COMMENTAIRES DE L'UNION DES PRODUCTEURS AGRICOLES DU QUÉBEC À LA CONSULTATION SUR L'ÉBAUCHE DE LA RÉVISION DU PLAN NORD- AMÉRICAIN DE GESTION DE LA SAUVAGINE**

Comme participant à la Table de concertation sur la gestion de la Grande Oie des neiges du Service canadien de la faune (SCF), l'Union des producteurs agricoles du Québec (UPA) a été informée de la consultation en cours sur l'ébauche de la révision du Plan nord-américain de gestion de la sauvagine (PNAGS). L'UPA désire par la présente, faire dans un premier temps, une mise en contexte sur la situation au Québec quant à la Grande Oie des neiges, une espèce surabondante et dans l'Est canadien. Cette brève mise en contexte permettra de mieux situer la nature de nos commentaires sur le document de consultation précité.

### **Éléments contextuels pour le Québec**

En ce qui concerne la Grande Oie des neiges, le rapport sur la réglementation concernant les oiseaux migrateurs (numéro 29), produit par le Comité sur la sauvagine du Service canadien de la faune (SCF)<sup>1</sup>, nous apprend qu'il y a une dizaine d'années, des groupes de travail composés de scientifiques canadiens et américains ont réalisé une étude sur l'évaluation des répercussions environnementales de la croissance rapide des populations des Petites Oies des neiges du milieu du continent et des Grandes Oies des neiges. Le travail de ces biologistes révèle qu'une des principales causes à l'origine de l'augmentation des populations d'Oies des neiges étaient liées à l'utilisation accrue des milieux agricoles, ce qui a contribué à l'augmentation de leur taux de survie et de reproduction.

Les biologistes constatent que ces populations sont devenues si grandes qu'elles ont des répercussions sur les communautés végétales dont elles et d'autres espèces ont besoin dans les aires de rassemblement et de reproduction. À cet impact négatif sur leur habitat naturel, les biologistes soulignent l'augmentation des dégâts causés aux cultures comme étant également une conséquence importante de la croissance des populations d'Oies des neiges.

Devant cette situation, le SCF de la faune a instauré plusieurs mesures de gestion dans le but de freiner la croissance rapide de la population et d'en réduire la taille à un niveau conforme à la capacité de charge de l'habitat. L'une de ces mesures, l'instauration d'une saison de chasse printanière, depuis 1999 au Québec, vise à accroître le taux de mortalité de la Grande Oie des neiges. De plus, dans la mesure où il observe une augmentation du nombre de cette dernière qui migre au printemps dans les terres agricoles de l'est du Nouveau-Brunswick et de l'est de l'Ontario, le Service canadien de la faune examine la possibilité d'implanter de nouvelles mesures spéciales de conservation dans ces provinces, afin de favoriser les activités déjà en place au Québec

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<sup>1</sup> Comité sur la sauvagine du Service canadien de la faune. 2010. Propositions de modification du *Règlement sur les oiseaux migrateurs* du Canada, 2010. Rapp. SCF réglementation oiseaux migr. n° 29, Environnement Canada, Ottawa.

qui visent à freiner la croissance de la population de la Grande Oie des neiges et en réduire la taille.

Il importe de souligner que, depuis les années 1990, la Grande Oie des neiges semble privilégier les terres agricoles par rapport au littoral de l'estuaire du fleuve Saint-Laurent pour se nourrir. Ce changement de comportement a créé une problématique de déprédation des cultures importantes que subissent les producteurs agricoles. Ces derniers constatent également une présence en plus grand nombre de la Bernache du Canada dans plusieurs régions du Québec où elles n'étaient pas présentes auparavant.

L'UPA est consciente de l'efficacité et de l'importance de la chasse comme moyen de gestion des populations fauniques. Néanmoins, au Québec, malgré l'autorisation d'une chasse de conservation au printemps, il a été constaté que les chasseurs sont plus actifs les fins de semaine et insuffisants en semaine. Hors, il importe de savoir qu'un volier de quelques milliers d'oies peut causer des dommages importants aux cultures en quelques heures seulement si elles ne sont pas dérangées/effrayées lorsqu'elles se nourrissent dans les champs agricoles. Devant cette situation, les producteurs agricoles ont obtenu une aide financière des gouvernements fédéral et provincial afin d'organiser un service d'effarouchement des oies (geese disturbing) sur les terres agricoles. L'effarouchement des oies vient donc agir en complémentarité à l'activité de chasse pour réduire ces dommages.

De plus, dans la mesure où les dommages aux cultures étaient récurrents année après année, à la demande des producteurs agricoles, les gouvernements fédéral et provincial ont convenu de la nécessité de mettre en place un programme de compensation des dommages causés par les oies. Malgré l'instauration dudit programme, il importe de mentionner que ce dernier ne couvre qu'en partie les pertes réelles des agriculteurs.

En ce qui concerne la Grande Oie des neiges, l'objectif démographique adopté par le Plan nord-américain de gestion de la sauvagine, et conservé dans le présent document de consultation, s'élève à 500 000 oies, soit environ la moitié de l'effectif de 915 200 individus dénombrés en 2011.

Dans le rapport du SCF précité, les modèles montrent que, sans une récolte printanière, la population croîtrait de nouveau rapidement (Gauthier et Reed, 2007)<sup>2</sup>, en raison, d'une part, des changements climatiques qui favorisent de bonnes conditions de reproduction dans l'Arctique et, d'autre part, des meilleures conditions d'alimentation (champ de maïs et autres récoltes) dans les aires d'hivernage et de repos.

Le rapport du SCF nous apprend également que le prélèvement par la chasse au Canada semble avoir été maximisé. Ainsi, depuis 2009, il est permis de faire la récolte

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<sup>2</sup> Gauthier, G. et E. T. Reed. « Taux de croissance projeté de la population de la Grande Oie des neiges selon différents scénarios de récolte », dans E. T. Reed et A. M. Calvert (éd.), *Évaluation de l'effet des mesures spéciales de conservation sur la Grande Oie des neiges : un rapport du Groupe de travail sur la Grande Oie des neiges*, une publication spéciale du Plan conjoint des Oies de l'Arctique, Service canadien de la faune, Environnement Canada, Sainte-Foy, Québec, 2007.

d'un plus grand nombre de Grandes Oies des neiges dans l'est des États-Unis, en vertu d'une ordonnance de conservation spéciale.

## COMMENTAIRES SPÉCIFIQUES SUR LE DOCUMENT DE CONSULTATION

### Niveau de population

D'entrée de jeu, le résumé du document de la présente consultation énonce le nouvel objectif suivant :

*« ... soutenir les populations de sauvagine de l'Amérique du Nord et leurs habitats à des niveaux qui satisfont les désirs de l'humain et perpétuent la chasse à la sauvagine, par l'entremise de partenariats guidés par des principes de science éprouvés ... »*

**Pour l'UPA, le PNAGS révisé devra également considérer les espèces de sauvagines qui sont en surabondance, par exemple, la Grande Oie des neiges dans l'est du Canada et la Petite Oie des neiges dans l'Ouest canadien, en fonction des dommages qu'elles causent aux cultures et prendre des mesures accrues pour réduire la taille de leur population.**

En ce qui a trait aux trois buts qui ont été déterminés comme étant fondamentaux à la réussite du PNAGS révisé et qui se lisent comme suit :

*«... 1) Populations de sauvagine abondantes et résistantes pour appuyer la chasse, entre autres, sans mettre en péril l'habitat.*

*2) Suffisance des terres humides et des habitats associés pour soutenir les populations de sauvagine aux niveaux souhaités, tout en fournissant des zones récréatives, ainsi que des services écologiques dont la société peut bénéficier.*

*3) Augmentation du nombre de chasseurs de la sauvagine, d'autres conservationnistes et citoyens qui profitent de la conservation de la sauvagine et des terres humides et la soutiennent activement. ... »*

À la lecture du document de consultation, l'UPA comprend que les buts précités visent à s'assurer d'une population de sauvagine abondante tant pour maintenir l'intérêt des chasseurs que pour fournir des services écologiques dont la société peut bénéficier (par exemple, l'ornithologie). **Au sujet de la population de la Grande Oie des neiges, plus spécifiquement, l'UPA est d'avis qu'il serait pertinent de considérer la notion de « population socialement acceptable ». À cet effet, elle considère que l'atteinte de l'objectif de 500 000 Grandes Oies des neiges dans la révision du PNAGS est fortement souhaitable.**



## **Système de gestion intégrée et groupe de travail sur les dimensions humaines**

En lien avec l'objectif du Plan d'adopter un système de gestion intégré, en ce qui concerne les populations de sauvagine en surabondance comme la Grande Oie des neiges dans l'Est canadien, ou la Petite Oie des neiges dans l'Ouest canadien, ou encore la Bernache du Canada, bien que non surabondante, **l'UPA souhaite que le Plan révisé intègre les préoccupations du secteur agricole afin de tenir compte, par exemple, des dommages aux cultures et des pertes financières assumées par les agriculteurs. En effet, le Plan ne doit pas être révisé qu'en tenant compte du bénéfice recherché pour certaines catégories d'utilisateurs de la sauvagine au détriment d'autres secteurs de la population qui en subissent les impacts négatifs précités.** Contrairement à ce qui est mentionné dans l'encadré de l'introduction du document de consultation (p.8), les agriculteurs ne devraient pas être considérés comme des « fournisseurs d'habitats » mais plutôt comme subissant l'adoption des milieux agricoles par la sauvagine ou d'autres espèces fauniques opportunistes. Ces éléments de préoccupation pourraient par exemple être pris en considération par le groupe de travail sur les dimensions humaines qui sera formé dans le cadre de la révision du PNAGS.

Ceci constitue, pour le moment, l'essentiel des commentaires de l'Union des producteurs agricoles du Québec sur le document de consultation sur l'ébauche de la révision du Plan nord-américain de gestion de la sauvagine.

c. c. Service canadien de la faune, Environnement Canada

Union des producteurs agricoles  
26 septembre 2011

## **COMMENTS FROM THE UNION DES PRODUCTEURS AGRICOLES DU QUÉBEC REGARDING THE CONSULTATION ON THE DRAFT OF THE NORTH AMERICAN WATERFOWL MANAGEMENT PLAN REVISION**

As a participant in the Canadian Wildlife Service's table on the management of the Greater Snow Goose, the Union des producteurs agricoles du Québec (UPA) was informed of the consultation process that is underway on the draft of the North American Waterfowl Management Plan (NAWMP) Revision. The UPA hereby wishes to present the background of the situation in Quebec as regards the Greater Snow Goose, a species that is overabundant in eastern Canada, which will provide a context for our comments on the above-mentioned consultation document.

### **Quebec context**

As regards the Greater Snow Goose, the CWS Migratory Birds Regulatory Report Number 29<sup>1</sup> reveals that, about a decade ago, working groups made up of Canadian and American scientists conducted a study on the assessment of the environmental impacts of the rapid growth of mid-continent Lesser Snow Geese and Greater Snow Geese populations. These working groups concluded that one of the main reasons for the increase in snow geese populations was the species' greater use of farmland, resulting in increased survival and reproductive rates.

Biologists noted that snow geese populations have become so large that they are affecting the plant communities at staging areas and breeding grounds on which they and other species rely. Biologists have noted another significant consequence of the growth in snow geese populations: besides negatively affecting the geese's natural habitat, the larger numbers are also resulting in, greater crop damage.

To deal with the situation, the CWS implemented several management measures to check the rapid population growth and reduce population size to a level consistent with the carrying capacity of the habitat. One of the measures, a spring hunting season that has been held in Quebec since 1999, is designed to increase the mortality rate of the Greater Snow Goose. In addition, insofar as it has noted an increase in the number of Greater Snow Geese migrating in the spring to farmland in eastern New Brunswick and eastern Ontario, the CWS is looking into the possibility of implementing new special conservation measures in these provinces in order to reinforce the activities already in place in Quebec aimed at curbing the growth of snow geese populations and reducing their size.

It should be pointed out that, since the 1990s, Greater Snow Geese have appeared to prefer feeding in farmland instead of the St. Lawrence River estuary shoreline. This change in behaviour has created a situation where agricultural producers are confronting damage to their major crops. Farmers are also noting an increased presence of Canada Geese in several parts of Quebec where they were not previously found.

The UPA is aware of the efficiency and importance of hunting as a means of managing wildlife populations. Although conservation hunting has been authorized in the spring in Quebec, it was noted that hunters are more active on weekends and not active enough on weekdays. Note that a flock of several thousand geese can cause major damage to crops in just a few hours if the birds are not disturbed or scared off while feeding in the fields. To counter the situation, agricultural producers obtained financial assistance from the federal and provincial governments in order to set up a geese disturbing service on farmland, which supplements hunting as a

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<sup>1</sup> Canadian Wildlife Service Waterfowl Committee. 2010. Proposals to Amend the Canadian Migratory Birds Regulations, 2010. CWS Migratory Birds Regulatory Report Number 29, Environment Canada, Ottawa.

means to reduce damage to crops.

In addition, should damage to crops recur year after year, the federal and provincial governments, at the request of agricultural producers, agreed on the need to implement a compensation program for the damage caused by the geese. However, although the program was implemented, it only covers part of the farmers' actual losses.

In the case of Greater Snow Geese, the population objective adopted by the North American Waterfowl Management Plan, and maintained in the present consultation document, is 500 000 birds, or about one half of the 915 200 birds present in 2011.

In the previously mentioned WCS report, models show that, without a spring harvest, the population would quickly begin to grow rapidly once more (Gauthier and Reed, 2007)<sup>2</sup> as a result of climate changes that favour good breeding conditions in the Arctic as well as improved feeding conditions (corn and other crops) on wintering and staging grounds.

The WCS report also states that the harvest in Canada appears to have been maximized. Since 2009, hunters have been allowed to harvest additional Greater Snow Geese in the eastern United States under a special conservation order.

## **SPECIFIC COMMENTS ON THE CONSULTATION DOCUMENT**

### **Population level**

From the outset, the summary of the document of the present consultation states the following new objective:

"The purpose of the North American Waterfowl Management Plan is to sustain North America's waterfowl populations and their habitats at levels that satisfy human desires and perpetuate waterfowl hunting, accomplished through partnerships guided by sound science."

**The UPA considers that the revised NAWMP should also take into account overabundant species of waterfowl such as the Greater Snow Goose in eastern Canada and the Lesser Snow Goose in western Canada based on the damage they cause to crops, and implement greater measures to reduce population size.**

In the consultation document, the three goals that were determined as critical to the success of the revised NAWMP read as follows:

Goal 1: Abundant and resilient waterfowl populations to support hunting and other uses without imperiling habitat.

Goal 2: Wetlands and related habitats sufficient to sustain waterfowl populations at desired levels, while providing places to recreate and ecological services that benefit society.

Goal 3: Growing numbers of waterfowl hunters, other conservationists, and citizens who enjoy and actively support waterfowl and wetlands conservation.

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<sup>2</sup> Gauthier, G. and E. T. Reed. 2007. Projected growth rate of the Greater Snow Goose population under alternative harvest scenarios in Reed, E.T., and A. M. Calvert (eds.). Evaluation of the Special Conservation Measures for Greater Snow Geese: Report of the Greater Snow Goose Working Group. Arctic Goose Joint Venture Special Publication. Canadian Wildlife Service, Environment Canada, Sainte-Foy, Quebec.

From reading the consultation document, the UPA gathers that the above-mentioned goals are aimed at ensuring an abundant waterfowl population both to support the interests of hunters as well as provide ecological services (such as birdwatching) that benefit society. **More specifically with regard to the population of the Greater Snow Goose, the UPA considers that it would be relevant to take into account the concept of a “socially acceptable population.” To this end, it considers that attaining the objective of 500 000 Greater Snow Geese in the NAWMP revision would be highly desirable.**

#### **Integrated management system and Human Dimensions Working Group**

In relation to the Plan's objective of adopting an integrated management system with regard to overabundant waterfowl such as the Greater Snow Goose in eastern Canada or the Lesser Snow Goose in western Canada, or even the Canada Goose (which is not overabundant), **the UPA would like the revised Plan to include concerns from the agricultural sector in order to take into account, for instance, crop damage and the financial losses borne by agricultural producers. In fact, the Plan must not be revised solely on the basis of the target benefits for certain categories of waterfowl users to the detriment of other segments of the population subject to the aforementioned negative impacts.** Contrary to what is stated in the box in the consultation document introduction (page 7), farmers should not be seen as “providing a habitat” but rather as having to deal with farmland being adopted by waterfowl or other opportunistic wildlife species. These concerns could, for instance, be considered by the Human Dimensions Working Group that will be set up as part of the NAWMP revision.

This constitutes, for the time being, the bulk of the comments by the Union des producteurs agricoles du Québec on the consultation on the draft of the NAWMP revision.

c.c.: Canadian Wildlife Service, Environment Canada

Union des producteurs agricoles

September 26, 2011

TO: NAWMP Revision Steering Committee and Writing Team

Draft September 22, 2011

**SUBJECT: Draft NAWMP 2012 Revision – consolidated comments from the Canadian Wildlife Service**

On behalf of Environment Canada's Canadian Wildlife Service, thank you for the tremendous amount of thinking and labour that has gone into the preparation of this draft Revision of the North American Waterfowl Management Plan (NAWMP). The comments below represent a consolidated point of view from the waterfowl and habitat management community within the Canadian Wildlife Service. As such it represents important feedback from a constituency that manages waterfowl and habitat from across Canada.

We recognize the immense challenge involved to integrate the results of the comprehensive consultation process leading to this point, and to articulate a vision based on the input received from such a wide variety of partners each representing their individual mandates. The primary objective of the consultation workshops was to reach consensus on the highest level fundamental goals of NAWMP. To achieve this grand objective, and bring together the diverse ideas of many partners, those meetings necessarily were very focused. This focus meant that the workshops were not able to also address the complete content of the Revision.

As a result, the draft Revision text does a good job of setting out the revised high level fundamental goals for populations and habitat conservation and describing a vision for a future formalized management framework that will support better integrated management decisions. This is important, and achieving this would address a number of the most important recommendations from the 2007 NAWMP Assessment.

On the other hand, the Revision does not yet provide strategic guidance for continued conservation during the immediate future while the Action Plan is being implemented. The waterfowl conservation community still needs guidance and direction regarding priorities (species, areas) and an indication of whether these have changed in the interval since the last NAWMP. We present below some strategic points that should be included in the Revision in order to provide guidance for on-the-ground conservation actions and priorities in the short and medium term. We recognize that having had access to a draft Action Plan right now might have changed some of our comments.

***Additional Key Strategic Points:***

1. "Other" waterfowl species

Recognizing that our technical ability to create a formalized framework to support better integrated management decisions is a lofty goal, and that we are relatively closer to being able to achieve that goal for only a few species, we are concerned that this focused approach will take us

further away from addressing some other important issues with some sea ducks and geese, while the focus remains heavily invested in primarily prairie ducks.

These other species are important to Canadians, because of our responsibility to maintain high quality breeding habitats for the majority of the continental populations, and as well, Canadians take a relatively larger proportion of the continental harvests of these species. Yet, a quick scan of the population objective tables in the draft shows that there are many of these species for which our knowledge is still so poor that we are unable to establish a numeric population objective.

We would like the Revision to place more emphasis on science to understand factors driving waterfowl populations and relationships between waterfowl populations and habitats, especially for species where basic information on population status, trend and harvest remain unknown.

## 2. The human dimension

CWS remains uncomfortable with our collective approach to the human dimension goal. In the draft Revision, while the broader public interest is mentioned, the text is very heavily focused on increasing the number of waterfowl hunters. While recognizing this document needs to meet the needs of 3 countries, from a Canadian perspective, the hunting and hunter support issue is overstated in the Revision. This point of view is supported by the results of consultation workshops which showed that waterfowl hunting was a tertiary fundamental objective in Canada and did not have a clear majority of support. We are very comfortable and supportive of the first two fundamental objectives but reiterate that the third does not reflect accurately the Canadian situation or desire.

We would like the Writing Team to try to reduce this emphasis, using some saved space to better address important conservation issues of other species described in #1 above. We feel this would better reflect the workshop outcomes which demonstrated a great range of opinions on this relative to the other two fundamental goals. We recognize that because of the diversity of opinions this is very difficult for the Writing Team.

We do not want the document to give the impression that human dimensions have not previously been taken into consideration; to the contrary the majority of historical hunting regulation amendments in Canada have been to accommodate hunter preferences rather than to address a conservation concern. In the same vein the fact that most Canadian Habitat Joint Ventures have broadened their scope to deliver “all-bird” conservation demonstrates that NAWMP is already facilitating an objective related to a broader set of the human dimension objectives.

Further, we should not allow our discomfort with this objective to delay progress toward integration of the two objectives for which the formalized process is clearer at the present time (harvest and habitat). The human dimension goal could be further examined and clarified over the coming years aiming for formal incorporation in the next NAWMP update. In the meantime, at the practical level, the human dimension component will continue to be accommodated at the local scale.

### 3. Try to broaden the appeal

CWS is concerned that the text may appeal mainly to those whose daily lives are deeply embedded in the waterfowl management community. This is because the text heavily targets institutional and process change, with the implication (although not stated explicitly) that the focus remains on the few relatively data-rich species like the mid-continent mallard. As stated above, this concern could be addressed by augmenting the text about birds and conservation issues, such as species status and knowledge gaps among the birds that we are collectively trying to conserve.

Broader appeal might also be achieved by explicitly recognizing the work of the Habitat Joint Ventures and their evolution toward delivering conservation for all bird species. The relationship between the NAWMP and the broader bird/habitat conservation agenda should be given a bit more attention within the revised plan. Of course, the Habitat Joint Ventures will have their own views.

### 4. What have we learned in 25 years?

In addition to charting a course for future integration, the text could benefit from celebrating what the community has learned, particularly in the past decade. For example, a great deal of thinking about the components of an integrated approach has resulted from focused efforts on mallards, pintails, scaup and black ducks. Could some of this be highlighted? Perhaps some effort to describe gains in understanding sea ducks, key points from the NAWMP Assessment? The original NAWMP is regarded as being a highly successful conservation initiative, some analysis and expression of why that is the case could be showcased, and those elements carried through to this revision of this Plan. The 2007 Assessment should provide a lot of fodder for this aspect.

### 5. Representativeness

We need to be sure that the text includes statistics and values of all three signatory countries. The CWS representatives to the NAWMP Revision Steering Committee and Writing Team will provide additional comments specific to Canadian interests, but the outcomes of the consultation workshops held in Mexico need to be reflected as well. Further, we caution against the flavour of the present text which is decidedly mid-continent in focus, while there are species and habitats of conservation concern outside of the mid-continent region that are not adequately represented in the plan.

### 6. Greatest challenges

- a. Achieving effective conservation during a period of challenging economic conditions
- b. Influencing land use and land use policies given current trends in food production, biofuels, resource extraction and so on
- c. Adapting conservation programs to be effective under climate change

In addition to the comments summarized here, you should be receiving comments from the partnerships representing the Canadian Joint Ventures.

Again, let us thank you for the hard work of the Writing Team to-date. We look forward to working with you to revise this draft of the NAWMP Revision and develop the Action Plan.

Sincerely,

Basile van Havre, Canadian Co-Chair of the NAWMP  
Director, Population Conservation and Management  
Canadian Wildlife Service



**Name:** John Devney  
**Organization:** Delta Waterfowl  
**Email:** jdevney@deltawaterfowl.org

Please comment on:

**1. The greatest challenges facing waterfowl management in the next decade:**

The Plan Committee appropriately provided a detailed list of challenges/threats facing waterfowl populations, the habitats they rely on, as well as the significant decrease in waterfowl hunting participation in the U.S and Canada. We are in agreement with the consensus view on these threats and affirm the following:

- Waterfowl participation is facing unprecedented losses in both the U.S. and Canada (a decline of over 30% in the U.S. and over 70% decline in Canada from the 1970's) which represents a crisis in culture as well as the erosion of the primary constituency, resource provider and advocate for waterfowl, their habitat and ultimately for waterfowl hunting itself. In our review, we felt that the description of the Canadian decline was quite understated relative to the significance of the decline. We hope the Committee can provide further emphasis in subsequent drafts.
- Key habitats are at risk with increasing pressure from a myriad of sources.
  - Prairie Canada continues to suffer ongoing wetland losses and in many areas low recruitment rates.
  - The U.S. Prairies, while recently increasing in stature in terms of percentage of breeding population and improving vital rate performance, is seeing the loss of CRP acreage, native grasslands and wetlands are under increasing risk
  - Many wintering ground habitats face differing pressures such as the implication of water scarcity in California and changing farming practices in the Gulf Coast to name but a few.
- The fiscal climate likely will result in scarcer resources which may not only result in a decrease in direct Plan programming but also in the resources available for many of the voluntary, incentive based agricultural policy mechanisms that have had a profound affect on habitat and vital rate performance across both the U.S. breeding grounds (CRP) as well enhancing wintering ground carrying capacity (WRP).

**2. The appropriateness and relative importance of the three goals:**

We agree fully with the discussion that the three fundamental goals are appropriate and inextricably linked. As noted population size dictates recreational opportunities, the quantity and quality of habitat supports abundant populations, etc. We do though seek to provide commentary that we believe in terms of prioritizing human uses (as described in the draft revision) that waterfowl hunters, in terms of their historical contributions (both financially and politically) deserve greater weight than other user groups.

**3. The most important, measurable objectives that would serve to accomplish the stated goals, and how to develop these:**

We believe a baseline of measureable objectives can be developed and in fact are already present. Population objectives (whether the current use of static population objectives as the original Plan stated or a range of population values recognizing environmental effects) are a critical milestone for tracking progress for the whole of the conservation effort. Hunter participation is easily assessed with existing tools and habitat quantity and quality can be evaluated both in terms of total population size as well as regional assessments of net landscape change.

**4. The nature of useful objectives related to recruiting and retaining waterfowl hunters:**

We greatly appreciate the Plan Committee's explicit acknowledgement of the importance of hunters in the Plan's activities as well as the specific reference to U.S. and Canadian waterfowlers as the primary constituency of the Plan. As we have noted in previous commentaries, we believe that this has been a grave omission in recent revisions.

Recognizing that recent trend, data numerically demonstrates that waterfowl hunters in both countries are suffering declining populations and poorer recruitment and survival (using established population biology jargon). The decline of waterfowl hunting has to be at the forefront of future discussions. While developing actions to arrest declines and improve recruitment and retention may be difficult, we believe the acknowledgment of the declines and having them rise to the level of a primary goal will place the necessary emphasis on the issue as implementation plans spawning from this Revision are enacted.

**5. The means to engage a broader constituency (i.e., beyond hunters) in the cause of waterfowl conservation:**

Ultimately, we believe the greatest potential benefit for engaging new stakeholders is to engender broader support for landscape level voluntary, incentive based policy actions that can affect habitat at a large scale. This type of programming yields remarkable public

benefits (clean air and water, mitigating flooding, carbon storage, endangered species and diverse species habitats, etc.) in a cost effective manner. Yet our ability to demonstrate and connect the beneficiaries of these actions (the public at large) with these policy efforts has largely been elusive. In order to bolster the broad scale support (especially in these difficult financial times) will require a comprehensive communications and marketing campaign to clearly outline the benefits (outcomes) all derive.

Also, we should note that we remain dubious that the broader public is a constituency or significant funder for direct Plan programming but rather as potential political ally to move policy actions towards constructive policy outcomes.

**6. The concept of integrated waterfowl management and the greatest challenges/benefits likely associated with integration:**

As the Revision articulates, the linkages amongst the diversity of functions begs for integration. One such potential outcome of this new approach would be the acknowledgement that hunter access in many areas of the wintering grounds is a primary factor in achieving recruitment and retention goals. This integration could prioritize habitat investments on public lands to provide both habitat values as well as adding incremental high quality hunting opportunities.

**7. Strategies that would make waterfowl management more efficient, effective and responsive:**

We believe a clear delineation of the critical functions and how different parties (Federal agencies, State and Provincial agencies, and the broad spectrum of NGO's) can populate the varied functions. Obviously there will be a high degree of cross pollinating and all agencies and organizations must define their own ability to engage in what suits their mandate, but a clear expression of all the necessary functions envisioned in the new integrated operations could yield less duplication, more efficiency and broader consensus amongst all parties.

**8. The necessity of changing or adapting our current institutions in order to implement the new NAWMP and the nature of the changes that may be warranted:**

We heartily endorse the creation of new functional bodies to address some of the key elements of the Revision, perhaps most notably the Human Dimension Working Group and other groups to outline and implement a course of action related to waterfowl hunter recruitment and retention.

Yet, we think it is important to note that there is a broad complement of technical experts that span habitat conservation efforts, regulations, population assessment, research and evaluation, amongst others that, are contributing at a high level to the whole of the waterfowl conservation/harvest management effort. Also, many of our government partners (State, Provincial and Federal) have explicit mandates and legal authority and/or direct constituency responsibilities that necessitate an engagement in certain tasks. We believe as discussions evolve around changing institutions, there is broad consensus amongst all parties that these changes suit their areas of expertise and keep necessary functions whole.

#### **9. The sufficiency of proposed recommendations and action steps to move this plan forward:**

As articulated, this Revision is a broad level, strategic exercise which sets out to chart a new course towards a well integrated waterfowl management community, and in that sense, the Revision achieves its goals and highlights new thinking about how to proceed. Yet this strategic approach necessitates a significant tactical plan about how to execute the vision expressed by the Revision. Also, by incorporating new objectives (such as hunter recruitment and retention), the ability to develop priority actions and establish objectives will be a daunting yet important task. We believe that the tactical plan development generated from this Revision will likely be as intensive as the Revision itself and will require extensive consultation and perhaps drawing upon new disciplines and experts as well as garnering the support for execution amongst all elements of the waterfowl conservation community.

#### **Other Comments**

The following will provide additional commentary from Delta Waterfowl on issues not identified in the structured questions posed above:

- **Prioritization** (*Geographical and Programmatic*)-It is becoming ever clearer that due to the current fiscal environment that the Plan must prioritize efforts to ensure the greatest possible return on stated population objectives. While a well resourced NAWCA could support a broad range of NAWMP projects across a diversity of habitats, entering an era of austerity, we believe it is prudent to be explicit about the highest priority endeavors. Obviously for most North American duck species, the most significant factors influencing population growth occur on the breeding grounds and as such, key breeding ground habitats should be the highest priority for investment.

Furthermore, conservation actions that have a measurable enhanced vital rate performance (in either a preservation of existing rates or adding incremental

value) should receive priority over actions that can't clearly demonstrate this basic outcome.

- **Continental Assessment as a Building Block to Adaptive Management**-The Continental Assessment provided a comprehensive review as to the state of knowledge across the full spectrum of JV's, a review of progress towards stated goals and some broad suggestions of how to move forward with Plan programming. This exhaustive exercise should be the backbone of the next tactical iteration of the Revision with clear acknowledgement of successes and failures, opportunities for improvement, information needs and the refinement of tracking methodology of Plan activities.
- **Plan Investments with Dual Outcomes**-As noted in comments above, we appreciate a new integrated approach in terms of investments in Plan activities. Delta has been consistently on record as supporting Plan investments into public trust assets to provide not only habitat but yielding access in areas of high hunter density. While we acknowledge the opportunities to pursue these actions on the breeding grounds are modest as public access requirements may limit biological effectiveness and the necessary scale of influence, non breeding ground habitat investments should prioritize public use. Significant sums of Plan programming have been expended on private lands and duck clubs, often times when the biological benefits have been modest and the owners have the capability to provide the financial resources for the development of their own properties. In times of declining waterfowl hunting participation, the evidence of access being an important variable in hunter retention and the potential for a significant reduction in NAWCA funding, we urge a significant shift away from investments in private duck clubs and towards public lands where the benefits will be enjoyed by a larger number of waterfowlers, all the while continuing to benefit migrating and wintering ducks and geese.
- **Recruitment and Retention Strategies**-While we recognize the scope of the Revision didn't extend to specific tactics related to hunter recruitment and retention, we believe the Committee should attempt to highlight the scope of activities proposed even if those would serve only as catalysts or thought starters for future implementation plans. The issue of recruitment and retention has been the source of a significant amount of dialog amongst many in the waterfowl community for some time, but frankly there has been little in terms of execution. Also, we believe that it is imperative that both the Canadian Wildlife Service and U.S. Fish and Wildlife provide some insights as to how they can facilitate and or participate in these activities. While we acknowledge the continual scarcity of resources and the enlarging responsibilities of these agencies, we believe that it will be critical to the success of recruitment and retention strategies that stakeholders from both CWS and USFWS play a role in as well as endorse the new priority of recruitment and retention.

We sincerely appreciate the opportunity to provide this feedback as well as our previous written comments and the participation by a variety of Delta staff in the focus group sessions. We believe the current draft truly reflects the priorities in today's world. We are especially appreciative of the explicit acknowledgement of the decline in waterfowl hunting in both the U.S. and Canada and charting a course forward to address this vexing problem. We look forward to engaging further as key decision points emerge and during the implementation phase.

## **North American Waterfowl Management Plan 2012**

### **Responding to Change: A Vision for Integrated Waterfowl Management**

Thank you for the opportunity to comment. I have reviewed the draft and offer the following regarding some of the nine elements listed as being of particular interest to the Plan Committee:

The greatest challenges facing waterfowl management in the next decade are the competition between the needs of waterfowl and the needs of the existing, and ever increasing, human population for land and water; and stresses to the landscape from climate change.

In the renewed purpose statement, I'm not certain what is meant by "perpetuate waterfowl hunting"; and how is waterfowl hunting separate from human desires? For the purpose statement I suggest, The purpose of the North American Waterfowl Management Plan is to sustain North America's waterfowl populations ~~and their habitats~~ at levels that best satisfy human desires for all uses of the waterfowl resource ~~and perpetuate waterfowl hunting~~, accomplished through partnerships guided by sound science.

Sustaining North America's waterfowl populations at levels that are doable and best satisfy the collective expectations of all users of the waterfowl resource should be the ultimate goal of a system for integrated waterfowl management. This goal recognizes the need for having population objectives that have been established after considering the various population sizes needed to meet the desires of all users, and that the population objectives are sensible (i.e., they are at levels for which the habitat needed to sustain the birds can be achieved). In all likelihood, the waterfowl population size needed to satisfy those whose use (desire) the waterfowl resource for viewing will not exceed the population size needed to satisfy hunters.

I recognize that underscoring the linkages among waterfowl populations, waterfowl habitats, and users of the waterfowl resource is at the heart of the draft Revision; and I understand that the consultation process for development of this draft resulted in consensus on the purpose and fundamental goals of the NAWMP. However, I struggle to understand the difference between key parts of Goals 1 and 2. If you "...sustain waterfowl populations at desired levels...", don't you have "abundant and resilient waterfowl populations to support hunting and other uses..."? To me, the wetlands and related habitats that are the subject of Goal 2 are the key factors to achieving Goal 1, and therefore, are a means (i.e., strategy) to achieving Goal 1 rather than being a fundamental goal "just because it is important".

I believe Goal 3 is the least important of the three goals, and I am not certain of the appropriateness of this goal. The size of the waterfowl population at which waterfowl hunters will be satisfied needs to be considered, as do the population sizes at which the desires of "viewers" of the waterfowl resource will be met, when the waterfowl population objectives for

the Revision are established. The financial and advocacy support made by waterfowl hunters on behalf of the waterfowl resource has played a critical role in the long-term history and success of waterfowl management, and although the number of waterfowl hunters has decreased, the passion for the resource remains strong among current hunters. Certainly, some of those among the non-hunting community of waterfowl users already support waterfowl management (e.g., purchase a federal duck stamp), but probably not the majority of the waterfowl viewing community. I agree that the waterfowl management community needs to be composed of more than hunters in order to support the conservation of wetlands and other waterfowl habitats that will be necessary to achieve success of the NAWMP. However, I see Goal 3 in the same light as Goal 2, a strategy to achieving Goal 1. If nothing else, Goal 3 should not be limited to wetlands conservation, it should address the conservation of wetlands and other critical waterfowl habitats.

Regarding aspects of the draft Revision other than the nine elements of particular interest:

Although the Revision will be signed by representatives of the United States, Canada, and Mexico, there is only simple reference to “all three countries” in the Executive Summary and the Introduction of the draft Revision. I suggest this be changed.

Throughout the draft Revision there is mixed use of references to “wetlands”, “wetlands and related habitats”, “wetlands and associated habitats” and “wetlands and other critical waterfowl habitats”. Although there are probably some instances in the document where reference to only wetlands is appropriate, I suggest that use of “wetlands and other critical waterfowl habitats” should be the norm.

On page 9, listed under our visions is “Continued financial support from public and private sources.” It seems that this statement should expand on what the financial support is for.

When discussing the Flyway System, examples are given regarding the United States and Canada. Although Mexico may not participate in the Flyway System like the other two countries, shouldn't there be some acknowledgement of their involvement. The same goes for the discussion of the “duck stamp”, what can be said about Mexico? Also, on page 26, numbers 2 and 6 under Nest Steps make no mention of Mexico (e.g., SEMARNAT).

On page 12, there is reference to the 2006 National Duck Hunter Survey; but on page 16 it is noted that the National Duck Hunter Survey was conducted in late 2005. The National Duck Hunter Survey 2005 was published in 2006.

On page 14, the following statement is made: The two main tools in the tool box for waterfowl management, habitat management and harvest regulations, have been ineffective at reversing the



general decline in hunters. --- Hunter numbers have decreased in recent times. However to say that harvest regulations have been ineffective at reversing the hunter decline, gives the impression that the intent of establishing liberal hunting regulations is to increase hunter numbers.

On page 16, regarding the SEIS, it is not only on the hunting of waterfowl.

On page 20, shouldn't National Fish and Wildlife Refuge System be National Wildlife Refuge System?

On page 22, the first paragraph uses AHM Task Force, and the second paragraph uses AHM Working Group. On page 23, "Harvest Management Working Group" is used, and on page 24, Harvest Management Working Group (HMGW) is used. Are AHM Task Force, AHM Working Group, and Harvest Management Working Group three different entities?

September 23, 2011

Greg Esslinger

USFWS – R2 Division of Migratory Birds



P.O. Box 1160  
Stonewall, Manitoba, Canada R0C 2Z0

27 September 2011

North American Waterfowl Management Plan Committee  
USFWS Division of Bird Habitat Conservation  
4401 North Fairfax Drive  
MS4075, Arlington, VA 22203

Dear Plan Committee:

Thank you for the opportunity to comment on the North American Waterfowl Management Plan 2012. We applaud both the Plan Committee and writing team for undertaking this revision and for their substantial investment of time and effort. As we mark the 25<sup>th</sup> anniversary of NAWMP it is time to celebrate our successes but to also set our path forward. To aid in that effort Ducks Unlimited Canada provides the following compilation of comments and suggestions as you complete the final report.

**Overview:**

- The steps articulated in the document are by-and-large laudable, and we do believe that an integrated management system will result in increased managerial efficiencies. However, this document falls well short of being a management plan. The subtitle 'Responding to Change: a Vision for Integrated Waterfowl Management' is more accurate, though the changes to which the subtitle refers are, in some cases, weak. We worry that presenting this vision document as a new management plan will leave the waterfowl community vulnerable to criticisms of an inability to articulate measurable objectives and devise actions to accomplish the objectives. Perhaps once the Action Plan is released these concerns will be addressed. Structural and procedural coherency within NAWMP and the joint ventures, and improving management performance is the major objective that this document strives to address; a concept that is both sensible and necessary. The greatest challenge will be to affect integration while avoiding the development of overly complicated organizational structures along with systems and processes that feed "analysis paralysis" and over-planning. Addressing continued habitat loss, particularly in areas with higher development pressure, and pursuing continental restoration objectives could stand out more from a thematic standpoint.

- The document starts off by stating that duck numbers are at an all-time high, giving the impression that we have collectively achieved our population goals yet does not clearly articulate the ongoing habitat or population goals or challenges that NAWMP needs to address moving forward. This is a gap that should be bridged in the document.
- In calling this a “A Vision for Integrated Waterfowl Management”, we would have expected a bit more of a high-level summary, ...this document seems to alternate between high level and diving into the weeds with much concentration on ‘uncertainties’. Some of the ‘weedy’ and ‘uncertain’ parts could be trimmed and moved to the “Action Plan”.
- The three core goals speak to societal and demographic trends associated with declining hunter numbers, and thus suggest that NAWMP be used as a tool to reverse this trend. It is unclear if NAWMP is the appropriate vehicle through which declining participation in waterfowling can or should be tackled.
- At a time when waterfowl conservation is confronting unprecedented financial challenges and a growing disengagement by traditional partners and the public in general, we are concerned that this plan does not build a foundation or a sense of urgency for a renewed commitment to NAWMP. Building a strong value proposition of NAWMP into this document could help to address this deficiency.
- The language in the plan is a significant departure from past plans where sustaining waterfowl harvest and recognizing the support of hunters was identified, to one where a fundamental plan objective is to sustain, and grow, the number of hunters. From our perspective this is a significant change and one which not all Canadian partners may embrace. This could be addressed by raising the profile of non-hunting supporters, so they don’t appear as afterthoughts.

### **Specific Comments**

- Page 8: Purpose statement - it is not clear to us how sustaining waterfowl and their habitats will perpetuate waterfowl hunting. Those two goals may provide the opportunity for hunting, but do not necessarily result in the perpetuation of waterfowling. Likely can be fixed with a minor word tweak. The previous draft purpose statement (reviewed during one of workshops) “to sustain abundant waterfowl populations while preserving the traditions of wildfowling and achieving broad benefits to biodiversity, ecosystem processes and the people of North America” seemed more congruous with the original intent of the plan.
- Page 8: Goal 1 - the inclusion of “to support hunting” narrows the focus of NAWMP... so dramatically declaring the “main” audience has the potential to alienate some traditional NAWMP partners (when we are desperately trying to broaden our base of support). Further, this ties the fate of NAWMP to the fate of hunting, which, while important, will not resonate with the broader public (even if we are successful with Goal 3). For this plan to appeal to audiences in Canada more explicit content directed at the broader base of supporters is needed.
- Page 8: Goal 2: The inclusion of “provide places to recreate” seems out of place in this goal which is about habitat and its benefits. We can see the intent to broaden this

to include specific provision of public hunting lands but it would seem a better fit in Goal 3 which is about supporting and growing the users of the resource.

- Page 8: Goal 3 – We are unclear why growing the number of “hunters” should be a primary goal of the plan. Growing general support, including hunters, for waterfowl conservation seems to be a more inclusive approach. Although Goal 3 references the importance of reaching out to a broader audience; this is not well reflected in the balance of the document.
- Page 8: The revision will need to ascribe some level of prioritization to the three goals, and allocate sufficient resources to achieving them in a subsequent implementation plan.
- Page 8: We found it difficult to fully understand the intent of the plan without the accompanying “action plan”. Will the “action plan” be available for review – or will be released as a completed document?
- Page 9: Not sure what “seeking beneficial gains for the ecosystems” means.
- Page 9: The original principle (#2) in the 2004 plan that spoke to sustaining waterfowl populations at objective levels seems to have been dropped. This is concerning.
- Page 10: Principle 7 places emphasis on the importance of JV and Flyway councils, and pays little attention to other stakeholders. Federal and provincial governments in Canada play an important role in their respective Joint Ventures and their role in NAWMP should be acknowledged to ensure a healthy partnership in the future.
- Page 14: bottom paragraph: “In some parts of the continent, particularly in regions of Canada, recognition of these ecological goods and services drives public policies and provides funding in support of wetland conservation” ...this statement seems to be confusing EFFORTS with SUCCESSES and gives the impression that things are going pretty good in Canada and we can devote more effort elsewhere! Reality is actually the reverse, where progress on policy in Canada lacking.
- Page 15: Adapting to change, 1st bullet – It is not clear why/how waterfowl management agencies/organizations have less control over production systems, etc than we did in 1986. Demands for commodities might be higher as global human populations have grown, but I think we have more control than we did at the start of NAWMP (when we held few conservation agreements).
- Page 15: Adapting to change, 5th bullet – Energy activities have increased without question, but evidence of impacts on waterfowl populations is scarce.
- Page 17: top paragraph: Mention of continuing loss of prairie wetlands in Canada would have been an urgent policy issue to highlight.
- Page 17: third paragraph: Actually, we find ourselves again in the outermost loop having learned that lack of policy progress over the last 25 years is one of our biggest failures ...this plan seem to indicate that focusing on hunters and governance is where we need to go...seems a disconnect here.
- Page 18, second paragraph: so, the new chapter in management will focus on hunters, social and environmental change and habitat...in that order...really?
- Page 18: Not quite sure what the statement “contemporary waterfowl conservation could be more effectively addressed with greater forethought, planning and facilitation”, means.

- Page 18: In an ideal world resource allocation would occur under some coordinated approach – but realistically many of those dollars are not transferable and cannot be “re-allocated”.
- Page 19: Getting into the discussion about “linked models” leaves more questions than answers. As usual, the “devil is in the details”, and it remains unclear how this would work or if it is even workable. We believe it is unrealistic to assume that these types of models can be built across the continent and at variable scales – at least in a timeframe to provide guidance in the next 5 years.
- Page 20, second paragraph: What does this mean? This plan seems to assume that all ‘institutions’ will have little individual flexibility in addressing goals of the plan...and that human and financial resources can be freely moved around.
- Page 20, paragraph 4: a good example of ‘too much detail’ and pre-scripting how things will work.
- Page 21: first paragraph – all the language about state-this or state-that is quite U.S.-centric.
- Page 21: The statement that existing bureaucracies need to be assessed as to their ability to integrate the other two goals seems to assume that all partners must be engaged with the pursuit of all three goals. We do not agree with this premise and encourage you to clarify this point.
- Page 22: We agree with the observation that *ad hoc* groups have contributed to waterfowl management and that they have operated with little to no support. Addressing this is a worthy venture.
- Page 24: We agree that implementation of an integrated approach will only occur if the ideas are sufficiently compelling and this is where we believe this plan, as written, is lacking. We do not feel that a compelling case has been made neither to move this ahead nor to re-energize the NAWMP partnership. Additional discussion on the benefits of NAWMP and the specific advancements that can be made from an integrated approach should be clearly articulated.
- Page 24: The third action of confronting the changing social landscape is not well addressed in the plan – other than explicitly including waterfowl hunters – little to no action is included for other users.
- Page 25: “The need for an integrated management system is apparent”. A stronger case for this necessity needs to be made within the document.
- Page 25: The idea of creating a human dimensions working group is a good idea but there are some pitfalls that need to be recognized and avoided. In particular, there is a danger of spending a significant amount of time deliberating upon issues that have long been and continue to be exhaustively debated unless it can quickly come to grips with the underlying challenge, namely an endemic lack of public acceptance of the state of our landscape and why citizens should be concerned and the role of wetlands and waterfowl populations in that context. It could be expanded to include those from outside of the resource management community to make it more relevant to other stakeholders beyond waterfowl management.
- Page 26: We completely agree with the point of “motivating others to join the cause” – in our opinion if we fail to achieve this the future of NAWMP will be in jeopardy. Unfortunately, it is unclear how this “re-vision” will help accomplish this objective.

- Page 26: Next Steps – many of these steps are technical in nature and therefore fall in the realm of only a few. As a plan whose intent is to bring folks together to work towards a common cause, we think these next steps are too narrowly focused. Including next steps where partners can see themselves will help to build consensus around the plan and insure implementation.
- Appendix C: the authors indicate that subsequent to the ‘Round 2’ consultations the weightings for goals for waterfowl hunting and waterfowl viewing/enjoyment were combined. No reason for merging these goals is provided. Certainly, management actions to accomplish these goals separately might be quite different. This post-hoc combining of goals without providing justification is concerning. This should be better explained in the appendix.

### **Final Thoughts**

The process of holding workshops and engaging partners in a consultative process was a positive approach to this re-write. Trying to synthesize those comments into a succinct document was undoubtedly a difficult task. While we are supportive of the notion of seeking a more integrated approach to waterfowl management, we encourage the foundation of this plan to be broader than that, especially since we are facing unprecedented challenges that could alter waterfowl management as we know it. The greatest challenge to waterfowl conservation in the next decade will not be whether we have an integrated approach to waterfowl conservation, but rather if we have the needed public support for waterfowl management. Without this support we will continue to struggle to obtain the necessary resources to manage populations and habitat, face a continued disengagement of partners in JV's, and fail to advance key policy objectives.

We thank you for the opportunity to comment on this document, and hope that our comments are useful as you finalize the report.

Sincerely,



Karla Guyn, Ph.D.  
Director of Conservation Planning

cc: Jamie Fortune, Acting CEO  
Dr. Henry Murkin, National Director of Conservation



One Waterfowl Way  
Memphis, TN 38120-2351  
(901) 758-3825 fax (901) 758-3850  
[www.ducks.org](http://www.ducks.org)

**President**

John W. Newman  
Covington, Louisiana

**Chairman of the Board**

John R. Pope  
Jacksonville, Florida

**Chief Executive Officer**

H. Dale Hall  
Memphis, Tennessee

September 23, 2011

USFWS Division of Bird Habitat Conservation  
4401 North Fairfax Drive MS4075  
Arlington, VA 22203

Attn: NAWMP Revision Comments:

Ducks Unlimited appreciates the opportunity to comment on the draft revision (Revision) to the North American Waterfowl Management Plan (Plan) and applauds the considerable effort over the last two years to engage the waterfowl conservation community in the process. The Plan has served as a model of collaboration, innovation, and effective conservation at an unprecedented scale since its inception in 1986. The Revision builds on a century of progress in waterfowl conservation involvement by state, provincial, federal, and private interests that ranges from mandated to voluntary. None of our comments are intended to detract from the agencies, organizations, or individuals who that have brought the waterfowl community to this point.

The 2011 breeding habitat conditions and associated waterfowl population were extremely positive. In fact, waterfowl populations and hunting opportunity have been generally favorable for an extended period from the mid-1990s to present. This should not distract the waterfowl conservation community, however, from the long term threats that exist. Habitat loss, unfavorable population status of some species, and declining hunter numbers and overall waterfowler support reflect longer term concerns that are not resolved by a single year's favorable conditions.

We appreciate the extensive consultation process that went into development of the Revision and understand that there will not be universal agreement on the language used to convey the intent. As a general rule, more concise and specific language is preferred over nuance and efforts to satisfy every perception. We are in overall agreement with the purpose statement and supporting goals; however, an alternative and more concise statement of purpose with greater emphasis on the goals themselves would be preferred to the relatively vague reference to "... levels that satisfy human desires..."



We do not expect unanimity regarding goals for waterfowl management or the relative weight placed among goals; however, the inclusion of explicit focus on waterfowl supporters and waterfowl hunting is, in our view, essential and is a strong point of the Revision. This is undoubtedly one of the primary challenges facing the waterfowl management community. Advancing our conservation actions and supporting science from biology and ecology to include social sciences, communications, and marketing is critical to expanding the base of support for wetlands and waterfowl conservation.

The Revision should include greater attention to habitat and habitat priorities. A map of continental priorities and a review of why these landscapes are important to waterfowl and waterfowl supporters would add to the balance in the Revision across the three goals.

In our view, the nuances related to harvest regulations have greater impacts on hunter populations than on waterfowl populations, and it is appropriate to question the degree of emphasis on waterfowl harvest management into the future. Historically, waterfowl conservation has favored harvest management and increasingly fine focus on single-species bag limits and within-season closures. We support more consistent and simplified harvest management regulations (e.g., season lengths and bag limits) within broader ranges of population status over a period of years. Breeding population surveys for waterfowl, among the most extensive and reliable for wildlife, are more than sufficient to detect population declines to levels approaching those from which populations historically recovered. This does not imply less support or need for measuring harvest, hunter activity, and population response. Instead, these functions become more important.

Staff and budget resources are limited, and the cost of conservation continues to rise. Thus, greater integration across goals will be required to most effectively and efficiently apply budget and staff. Obviously, it will be necessary to acknowledge the tradeoffs in how we approach waterfowl management in the future compared to the past. For waterfowl management to advance to the next level, no less emphasis on waterfowl habitat conservation is warranted. However, emphasis on harvest management can, in our view be balanced more equitably with a focus on waterfowl hunters and other waterfowl conservationists. Adding the explicit focus on the human dimensions aspects of waterfowl conservation is timely and should, in fact make harvest management more effective and efficient. We encourage the community to embrace the need for this emphasis. Ducks Unlimited is uniquely positioned to play a role in advancing the traditions of waterfowl conservation support and venture into an even broader base of support, and we look forward to the opportunity to engage.



The waterfowl management community must be adaptable and positioned for change in a changing social, fiscal, and ecological landscape. This will necessitate a re-examination of the institutions in support of waterfowl management. The Plan Committee, Flyway System, Joint Ventures, NGOs such as Ducks Unlimited, and other institutions have been developed over time as the demands on waterfowl conservation and our understanding have changed. It is entirely appropriate that the waterfowl conservation community examines the efficiency of the systems of governance, technical support, and collaboration that have served it so well but may need to be modified to meet future demands. Along these lines, we urge much greater integration across population, habitat, and supporters at both the technical and policy levels.

The Revision has accomplished the goal of “re-visioning;” however, the effort to define more specific strategies should not be delayed, and we urge purposeful advancement of the action plan in support of the Revision. And, the leadership for this must come from the Plan Committee. The Revision makes a strong statement about the need for change and should be clear that the Plan Committee has the key role in this regard. Although great technical integration and progress is needed, leadership from policy-level decision makers is the key first step. Progress on implementing the Revision should not wait for the technical work to be completed. The Plan Committee should set the expectation for integration across harvest, habitat, and users and play the primary role in advancing the technical work leading to a coherent management system.

Overall, the Revision is complete and well written, yet would benefit from a thorough copy edit. Other more specific suggestions follow:

Pg 14 – There was considerable work on human dimensions prior to 2000, although it was largely state-specific. Rather than say that the management community did not undertake social science research, “only limited initial work into ...” would be more accurate.

Pg 17 (and elsewhere) - The word “geographically” should be inserted in front of the phrase “isolated wetlands” wherever it occurs. From an ecological perspective, very few wetlands are truly isolated.

Pg 18 - The section “A Vision for Integrated Waterfowl Management” begins with the linkage between hunters and others who advocate for funding. While this very is important, it has less to do with integrated management per se than support for the waterfowl management enterprise. This section should be refocused to more directly state the importance of integration; as written, the value of integration comes across somewhat ambiguously. Introducing this section with the first paragraph from page 19 would be more direct.

Pg 19 - There should be a strong and consistent emphasis on the need for change throughout the Revision. On page 19, the first sentence begins, "This revision advocates for..." should perhaps say, "demonstrates [or articulates] the need for." Again on pages 22-23 ... "The management community should attempt to resolve these issues..." should be more definitively stated. Stronger language throughout the revision focusing the need for change would help position the waterfowl management community for the challenges ahead.

Pg 23 (and elsewhere) - The language throughout the Revision should be forward looking and careful to avoid becoming dated shortly after release. For example, in a couple of paragraphs on page 23, the revision is dated by the reference to "following completion of the 2012 revision." Also, on page 24, "If the plan revision now embraces..." and later "it is probably premature..." should be more definitive and forward looking.

Pg 23, last paragraph seems to be somewhat in conflict with #9 on pg 27. Shouldn't the Plan Committee "lead a review of progress made toward attaining new Plan objectives"?

Pg 24, recommendations - The most notable near-term actions include the need to formalize the leadership and integration role for the Plan Committee, immediately formalize a human dimensions working group, and establish the technical working group with responsibility for integrating across the sciences of population, habitat, and people management. The Integration Technical Team (ITT) will be an essential support group to establish. The Revision should, however, avoid the tendency to craft this as a technical process when policy leadership (via Plan Committee) will be essential for waterfowl conservation to remain a priority.

Pg 26, Next Steps – Again, emphasis here is on the next technical steps. Greater emphasis on the need for strength in administrative/political leadership would serve to establish the expectation that change is needed and anticipated as part of the on-going evolution of waterfowl management.

In response to the specific input requested by the Plan Committee:

1. The greatest challenges facing waterfowl management in the next decade.
  - a. Maintaining the habitat base for waterfowl is paramount; however, equally important are engaging and retaining support for waterfowl conservation both from traditional as well as non-traditional constituencies. If our mission is not relevant to traditional supporters and new constituencies in the future, we will be unlikely



to gain the funding sorely needed to accomplish waterfowl and wetlands conservation.

2. The appropriateness and relative importance of the three goals.
  - a. We agree with the overall outcome of the average responses to the valuing exercise (Appendix C) which was similar in the intrinsic values as well as the value of each goal as a conduit to achieving others. While the goals are balanced in terms of weight, the responsibilities by various entities for delivering on the goals may be much different – it will be important for all involved in waterfowl and wetlands conservation to “see themselves” in each goal.
3. The most important, measurable objectives that would serve to accomplish the stated goals, and how to develop these.
  - a. Populations – using a range (or a long-term average) population level as a management objective is more desirable than a specific population level used to guide annual allowable harvest. Managing harvests within these broad ranges is preferred. Population objectives that are established should be relevant to the contemporary capacity and established objectives for wetlands and associated waterfowl habitats.
  - b. Habitat – Priorities also will be important for which waterfowl landscapes require greatest attention. The plan should identify priority landscapes – include a map in the Revision of these priorities. Additionally, emphasis on constantly improving our monitoring systems and using emerging technologies to do so (e.g., GIS, remote sensing, unmanned aircraft, etc.) would be appropriate.
  - c. Supporters – Traditional support has declined over the last 30-40 years in both the U.S. and Canada. A near-term objective of stabilizing hunter numbers and an ultimate objective of increasing numbers (e.g., in the U.S. to the 1997-2001 average of 1.35 million) should be established. It would also be appropriate to include an objective for retaining the support of waterfowl viewers (i.e., ~15 million) and others who enjoy waterfowl and wetlands.
4. The nature of useful objectives related to recruiting and retaining waterfowl hunters.
  - a. An increased emphasis on retention and reducing the rate of churn would be appropriate. Actions should be supported by social science research (e.g., motivations and barriers to participation), active adaptive management, and evaluated through long-term measures of engagement.
5. The means to engage a broader constituency (i.e., beyond hunters) in the cause of waterfowl conservation.

- a. This largely would involve a communications strategy that focuses on the value of waterfowl and wetlands conservation beyond hunting. The obvious starting point here is the 15 million people who travel at least a mile from home to view waterfowl – and even more specifically, the more than 5 million who travel out-of-state to do so.
6. The concept of integrated waterfowl management and the greatest challenges/benefits likely associated with integration.
  - a. Acceptance by the waterfowl management community of the need for change is the predominant near-term impediment to integration.
  - b. Technical complexity related to coherence is an obvious challenge that will require long-term emphasis.
  - c. Acknowledging that this will require leadership before the technical strength can be effectively applied is essential.
7. Strategies that would make waterfowl management more efficient, effective and responsive.
  - a. Greater balance in favor of habitat for waterfowl and waterfowlers is needed – habitat is the one feature of waterfowl conservation for which we have the greatest immediate and lasting impact.
  - b. Reduced specificity in harvest management while retaining the monitoring needed to track population status and trends. Consistent and simplified regulations should be considered as a potential path to greater hunter recruitment and retention.
8. The necessity of changing or adapting our current institutions in order to implement the new NAWMP and the nature of the changes that may be warranted.
  - a. In order of priority – although all are near-term needs:
    - i. A review of the composition and increased leadership role of the Plan Committee. It will be critical that the Plan Committee provides the leadership required to advance the integration of objectives and strategies for population, habitat, and waterfowl supporters. The Plan Committee should clearly establish the expectation that emphasis on human dimensions will be fully integrated into the traditional emphasis on harvest and habitat management. Leadership will be essential by this group as we advance different harvest management regimes, each with greater perceived risk than considered acceptable in the past.
    - ii. A formalized and supported Human Dimensions Working Group



- iii. Establishment of an Integration Technical Team that is representative of the expertise needed to advance all three fundamental goals.
- 9. The sufficiency of proposed recommendations and action steps to move this plan forward.
  - a. At this point, these are largely too general to be of great utility. They definitely point to the primary actions that need to be developed. We urge completion and implementation of the action plan as soon as possible.

In closing, Ducks Unlimited will continue to be a leader in waterfowl habitat conservation and serve as a primary source of support and supporters for waterfowl and wetlands. We are completely supportive of the direction of the Revision in seeking coherence and its other broad, forward-looking aspirations. We encourage the Plan Committee to assertively exert the strong and decisive leadership that will be needed to take us into the next generation of waterfowl conservation.

Sincerely,



H. Dale Hall  
Chief Executive Officer

September 26, 2011

To: NAWMP Revision Steering Committee  
From: Eastern Habitat Joint Venture Management Board

**Subject: EHJV Review of the Draft NAWMP Revision 2012**

The draft 2012 NAWMP Revision delivers exactly its stated intent: a visionary document that frames the future of waterfowl and wetland habitat conservation in North America. The draft Plan is thought-provoking and the authors have taken a good first step to chart a path forward for this important initiative.

The Eastern Habitat Joint Venture (EHJV) is supportive of the Revision and looks forward to continuing to work with the NAWMP Revision Team to review and determine a future course for waterfowl habitat conservation and waterfowl population management in eastern Canada. The goals as stated within the Revision document articulate the reality that underlies conservation efforts today and begins to move us beyond “ducks” and “hectares/acres” with the formal inclusion of “waterfowlers and conservationists”

The draft proposes significant refocusing of the NAWMP and of course, difficulties remain:

- How do we move toward Integrated Waterfowl Management, in which enhanced monitoring and assessment systems appear to be the solution to better understanding ecological change and taking more appropriate management actions, when budgets and programs are continually challenged to do more with less?
- Waterfowl Populations and Habitat – so intrinsically linked yet so institutionally divided; how is it thought that we will bridge this gap?
- Additionally, where do we find the capacity to incorporate the “human dimension” in a meaningful way beyond that which the Joint Ventures have been doing for years? The Joint Venture is interested to learn what is planned for the *Human Dimensions Working Group*.

Given these questions, that you too struggled with in the Revision document, the EHJV is looking forward to the opportunity to review and comment on the companion document, the NAWMP Action Plan. We hope that within the Action Plan we see more prescriptive, or more detailed, steps to implementing the Revised NAWMP on which the EHJV will be better able to provide meaningful comment.

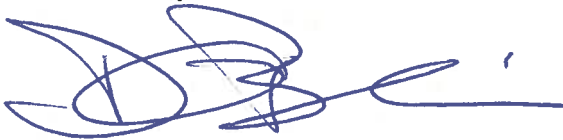
The EHJV partners would however like to share several specific comments with the Writing Team:

- We are concerned about the second paragraph of the Introduction of the draft (*"The 2011 breeding population index of ducks in the traditional survey area is among the largest ever recorded, and the size of the duck and goose harvest has rebounded to that of the 1970s – the baseline period for the Plan."*). While 2011 waterfowl populations are at record levels due largely to high spring and summer precipitation in much of Canada, continental objectives for habitat restoration remain well below targets in Eastern Canada, particularly in Ontario. A broad sweeping statement such as this, especially in the introductory section of the draft Plan, could have serious ramifications to the continued stability of waterfowl and wetland conservation programs. While successes have undoubtedly been achieved, much work remains. Funding partners may question whether their continued investment is necessary if goals have already been achieved. Could this statement impact our ability to use this document as part of a package to potential partners or funding agencies?
- It appears that limited attention was paid to the habitats and waterfowl populations of eastern Canada when the Plan was being drafted. The document as written illustrates considerable focus to the Central Plains of North America with only passing mention that waterfowl interests are found from coast-to-coast-to-coast across Canada. The EHJV has perhaps the most diverse landscape of any joint venture in North America and we wonder how our situation factors into some of the conclusions made in the draft Plan?
- The document does not make mention of sea ducks, arguably the suite of ducks for which the least is known, which do not necessarily fit into the model involving hunters and conservationists, and whose declining populations are likely to be greatly impacted by climate change.
- Little mention is made of the considerable successes we have had in the conservation of habitat using the suite of tools that NAWCA and other funding sources permit. There is a lack of acknowledgment of the accomplishments that EHJV (and all other joint ventures) partners have made. Canadian non-governmental organizations and Canadian governments have been critical to the success of the NAWMP over the last few decades. This information is crucial for building a case for continuing our work and in fact for potentially broadening the scope of work that is permissible under current funding programs given ecosystem and societal climate i.e. influencing land-use policies, etc.
- There is also very little mention of on-going threats to wetland habitat. This could ultimately lead some to believe that the habitat resource is well protected, resilient and healthy, and that conservation efforts could be focused elsewhere. Wetland loss and degradation continues to be a concern particularly in areas adjacent to the lower Great Lakes (continentally significant waterfowl staging areas). The EHJV strongly supports a continued focus on and investment in habitat conservation.

- Pursuit of multiple linked goals within an integrated system is a positive direction forward. A large part of this must include a better understanding and adaptation to shifts in social paradigms such as the decline in numbers of hunters. A decline in the number of waterfowl hunters across Canada and the United States has had a significant impact on public revenues generated for conservation activity, and on the overall public awareness of NAWMP and its objectives. What if hunter numbers continue to decline despite best efforts to recruit more hunters? The draft Plan identifies the need to reach out to new non-consumptive conservation partners and users to help bridge this decline; however, despite efforts to date, we have not been able to adequately fill this revenue or awareness gap. The current draft Plan will not, in and of itself, expand the waterfowl constituency and inspire the non-waterfowl community to join us. At the very least a greater emphasis on other benefits provided by waterfowl habitat to other birds and to society is warranted if we hope to engage new partners under the Plan.
- The EHJV is a bilingual Joint Venture so we would like to point out that the French language version of the document is very poorly written; this and any companion documents should receive considerable review prior to subsequent release.

On behalf of the EHJV, I would like to thank the NAWMP Revision team for their efforts throughout the process and for the opportunity to review the draft Revision document. As per the direction of the EHJV Management Board, given my role as Chair, I am forwarding these comments which represent the collective response of the EHJV Management Board.

Sincerely,



Doug Bliss, Chair, EHJV Management Board





**IDAHO DEPARTMENT OF FISH AND GAME**

600 S Walnut / P.O. Box 25  
Boise, Idaho 83707

C.L. "Butch" Otter / Governor  
Virgil Moore / Director

September 26, 2011

USFWS Division of Bird Habitat Conservation  
Attn: NAWMP Revision Comments  
4401 North Fairfax Drive MS4075  
Arlington, Virginia 22203

Dear Plan Committee:

Thank you for the opportunity to comment on the 2012 Revision of the North American Waterfowl Management Plan (NAWMP). The Idaho Department of Fish and Game (IDFG) has been actively engaged in the Revision process as a member of the Pacific Flyway Council and Study Committee, and as a participant in the NAWMP Revision workshops. The purpose and goals in the Revision reflect what was learned by the Plan Committee and it is apparent that great effort has been put forth to provide a meaningful path forward for waterfowl conservation. Furthermore, the Revision thoroughly presents the challenges that lie ahead for the waterfowl conservation community.

The IDFG agrees that the future of the waterfowl resource and the legacy of waterfowl hunting is far from secure. The fiscal realities mentioned in the Revision apply across the nation and the IDFG is in the midst of a process to find ways to engage a broader constituency. The NAWMP has achieved tremendous success and has served as a model for wildlife management planning efforts, but it is important to acknowledge the economic, social, and ecological challenges before all of us. To preserve wetland habitat that benefits waterfowl and other wetland dependent wildlife, it is necessary to leverage already limited funding and to seek out and engage new partners.

The IDFG wholeheartedly agrees that harvest management and habitat conservation need to be integrated. It is necessary to establish common population objectives for habitat and population managers. The Pacific Flyway is in the early stages of developing a more consistent and comprehensive dialogue with the habitat management community, particularly the Joint Ventures.

The IDFG understands the decline in waterfowl hunter numbers has continued independent of hunting regulations. We have noticed similar trends in big and small game hunters and are currently exploring opportunities to recruit and retain hunters, as well as broaden our constituency. This trend is occurring nationwide and is likely due to sociological changes such as greater demands on time and the lack of access to places to hunt. The Revision recommends

*Keeping Idaho's Wildlife Heritage*

developing social models to support multi-scale decision making for waterfowl hunters and other users and then use these models in an integrated framework to manage waterfowl habitat and populations. Furthermore, the Revision recommends that a Human Dimensions Working Group and an Integration Technical Team be established to accomplish this task. We believe it is necessary to engage all stakeholders in order to build upon the successes achieved by the NAWMP, and find it difficult to understand how highly technical modeling will add clarity to this process. Moreover, we actively engage the public in wildlife management and the season-setting process, and will continue to work with the Pacific Flyway to help ensure harvest packages and regulations are structured to help support hunter retention and recruitment needs.

We are concerned that the Revision may be too complicated to engage some of the traditional NAWMP stakeholders (i.e. waterfowl hunters, other conservationists, and citizens whose passion is waterfowl and wetlands; p. 7). The concepts of integration and coherence, the emphasis on models, and the focus on management challenges may confuse rather than provide a vision for constituents. Past revisions of the NAWMP have provided that clear vision for everyone interested in waterfowl management and habitat conservation. The revised NAWMP plan should engage and encourage collaboration among State and Federal agencies, Joint Ventures, Non-Governmental Organizations and policy makers. Furthermore, it should provide a clear message of what integrated waterfowl management means to current and potential stakeholders.

The IDFG also believes the Revision should emphasize the accomplishments achieved through the NAWMP to date. It is important to acknowledge these accomplishments as we face the changing landscape of waterfowl management and wetland conservation.

We appreciate all of the work the Plan Committee has done during this revision process. Many challenges lie ahead to achieve true integration of the waterfowl conservation community. The IDFG will provide our continued support as the process moves forward.

Sincerely,

A handwritten signature in blue ink, appearing to read "Virgil Moore for".

Virgil Moore  
Director

VM:JK:clc

## IN Division of Wildlife

1. It is not clear whether we are being asked for the greatest challenges to waterfowl, or the greatest challenges to waterfowl management. It seems implied that the Plan Committee feels that the greatest challenge to waterfowl management in the next decade is the lack of integration of harvest, habitat, and human dimensions aspects of waterfowl management. If that is indeed the implication, we reject it. We may not have a perfect system, but it has been adequate and is likely to continue to be adequate even if integration is not achieved. Without knowing the form that integration will take, it is impossible for us to comment on whether we believe it will be a change for the positive or the negative. The greatest challenge facing waterfowl is clearly habitat loss and degradation (from CRP withdrawal, industrial destruction in the Arctic, etc.). Stress on federal budgets puts funding for conservation programs (such as that in the Farm Bill) at risk. Declining hunter numbers decrease funds available through license and duck stamp sales, as well as degrading interest in and support for our work among the public. The greatest challenges facing waterfowl management are likely fiscal concerns. State and federal budgets do not seem to be recovering, putting a strain on the work we are able to do on the ground (surveys, habitat acquisition) and our ability to coordinate with our partners (travel restrictions in state agencies, for instance). Much of the work we do does not relate well to teleconferencing or other technological means of discussion. Attendance at Mississippi Flyway Council meetings has declined in recent years, restricting exchanges within of the waterfowl management community.

2. The three goals are all appropriate, and are listed in what we think is the appropriate order of importance. It is not clear that goal 1 (populations) is achievable without goal 2 (habitat). It is also not clear that advocacy and financial support necessarily follow from goal 3 (growing supporters), unless the definition of “actively support” includes membership in conservation organizations, buying duck stamps and/or hunting licenses, or similar requirements.

3. Population goals are the most important and the most easily measured. We understand that the desire for habitat and harvest to be linked through population goals is what spurred this Revision. However, it remains unclear to us what the interface between harvest and habitat will look like, in terms of the actual regulation of hunting. While these first two goals (populations and habitat) are closely linked, we do not believe we greatly affect duck populations through hunting regulations. Habitat on the breeding grounds, in particular, should be our focus. Presumably much of the early work (once the Revision is adopted) will focus on relating yield curves/habitat to shoulder points/harvest. This is one of the more important ideas we were hoping to see in this revision. We are concerned that this Plan may be going far beyond these basic needs in too complicated a manner. Determining how this work is to be accomplished will require tight coordination with the states through the Flyway system. Regarding the final goal, we need to formulate measurable objectives that define “growing” numbers of hunters and conservationists. As for what metrics to use (stamp sales for hunters, amount donated by other groups, etc.), these require much more consideration than we can give here. This is likely an important starting point for the Human Dimensions Working Group.

4. The nature of useful objectives related to recruitment and retention of waterfowlers is that specific objectives are not currently known—certainly current information on this subject is sparse. How do we measure hunters retained or recruited? How do we track them? We are aware of some ongoing work (in Illinois, for instance) on surveys that may begin to provide measurable metrics on recruitment and retention. Duck stamp sales can be a useful metric to some extent, but not necessarily one that is specific to recruitment or retention. Each state has idiosyncrasies in its licensing system that likely make it difficult to combine information across states—in some cases, it makes it virtually impossible to even estimate hunter numbers within a state. HIP registrations within a state can be useful but cannot be simply summed because of the requirement to register in all states in which one hunts. Adding a question to the HIP survey (other states in which one registered or is planning to register in a given year) may allow us to get at that more reliably. It may not be within our power to address the large-scale societal issues that are driving the decrease in hunting. The first question may be why people have quit hunting and

concentrate on how we can affect those factors. The crucial follow-up to this is why new waterfowlers start hunting. Having answers to this will help us understand how we can make access to the sport easier for all (not just youth). It is clear that we cannot affect recruitment and retention with higher populations of ducks and better habitat, so these aspects of why people start and quit hunting will help us address declines in hunting from both ends. We believe that the state is the appropriate level for recruitment and retention efforts. A national or international working group or committee would necessarily be so broad that, while it may be able to offer very useful help and guidance, it would likely be ineffective at recruitment and retention efforts in its own right. It is unclear whether this (a national or international group working directly on recruitment and retention) is the intent of the Plan—again, without more details, it is difficult to comment on this aspect. A national marketing campaign may be an example of how a national group could help support local efforts. Even if we could somehow measure recruitment and retention, would it ever be measured as something other than a negative number? We do not know whether a net gain of waterfowl hunters is realistic, but we agree that measurable objectives are important before we can begin addressing the problem.

5. We do not even engage hunters as well as we should and we have little experience with those outside our circle—we only engage people that come to us. It is a good question, but not one we have answered effectively. There may be expertise within natural resources agencies (or even within the larger frameworks of state/federal/provincial governments) that is not currently being tapped by waterfowl managers, in terms of outreach and public interactions, that could be helpful in these endeavors. We need to share our goals with these other agencies and individuals to show that many of our goals are not mutually exclusive. In addition, we need to determine exactly what it is we are asking of this “broader constituency,” whether that is fiscal support, political support, both, or something else. The real question seems to be how to get non-hunters to help “foot the bill” for waterfowl, so to speak. It is a difficult question for two reasons. One is that we do not know how to engage these people effectively, as already mentioned. The second, and probably as important, is a sense of distrust among hunters at involving non-hunters in these decision making processes. Hunters have thus far paid the vast majority of the way for waterfowl, and it is only fair, in our minds, to continue to put consumptive use at the forefront of waterfowl management. A growing non-hunting segment becoming involved in the user group could cause more conflict than solutions. Again, how this is carried out is critical, and harvest managers must be intimately involved in the planning of this process if it is to go forward and be successful.

6. The Revision fails to convince that integration will provide “benefits” and “efficiencies.” This is stated but not supported in any way, and no examples are given. We see integration as forming more bureaucracy that may impede the progress of each individual discipline and cannot see any gained efficiencies. Perhaps more confidence can be instilled with the forthcoming action plan, but the addition of more levels of oversight in the form of the proposed Integration Technical Team (ITT) seems counterproductive to the idea of streamlining waterfowl management.

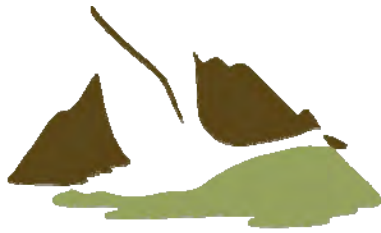
7. Current waterfowl managers may be able to (and need to) recruit other administrative units and/or staff from their agencies to take on integrated functions (e.g., joint habitat management, land procurement, etc.). As mentioned above, there may be expertise within natural resource agencies (or even outside these agencies but inside state/provincial/federal governments) that is currently untapped by waterfowl managers, but that could be helpful. We need clear population goals given certain habitat conditions. We need to determine habitat needs to achieve these goals while recognizing that weather has a major uncontrollable effect on both habitats and populations. We need to explicitly recognize that we have little control over population levels through harvest. These should be common goals between the harvest and habitat communities. We need human dimensions information, not modeling. We need to understand the motivations of hunters so we can understand how to affect them positively with the goal of retaining as many hunters as possible. We need information to help determine strategies to recruit new hunters. We need to work to ensure the security of current funding sources for habitat conservation and identify new ones. New funding sources could be supported by new and/or non-hunter groups.

8. We do not see gross inefficiencies in the current system and feel that the document does not do a good job of illustrating them. Assertions that there are efficiencies and benefits to be gained from integration are not supported with documentation or examples. The form that the integration mentioned so often in the document would take is not clear. It is difficult to approve or disapprove of such a broad vision without having more detail as to how that vision will be realized. At this time, we do not believe there is a need to change the institutions in place. We think that the ITT, as laid out in the plan, is a step in the wrong direction. We note that there is no representation given to the Flyways, other than such as may be in place on the NSST, HMWG, and HDWG. We believe that the states should have explicit input through Flyway representation if an ITT-like body is formed. Until more detail is provided, we cannot support the ITT concept. However, we believe that a task group, not appointed by the Plan Committee but with representation selected from and by the Flyways and other stakeholders, could begin work on integration of population and habitat goals. It is important to examine our population goals related to environmental conditions. The Joint Task Group Report acknowledges that "average environmental conditions" was based on a period of above average precipitation. Under average environmental conditions, the established population goals are unrealistic without major improvements in habitat over a vast area. These improvements are unlikely, given current funding levels, agricultural practices, and other uncontrollable societal changes.

9. It is difficult to determine whether the proposed recommendations are sufficient, because many of them are couched in such broad terms. For instance, we have difficulty grasping how "linkages" can be "actively managed." Much of what is recommended involves simply accepting the vision of this Revision ("adopt," "embrace"), despite the case not having been made that integration will be of benefit—what are the specific problems that our current paradigm experiences, and how will integration correct them? Regarding the recommendations under "Confronting the Changing Social Landscape", we support the formation of the Human Dimensions Working Group and the associated tasks. However, we feel the group should concentrate initially on hunter recruitment and retention, rather than on complex conceptual integration models. We agree with the desire to formulate common goals and objectives but prefer to work within our respective systems to achieve them. Reviewing how we do things is critical, but do we need to spend the considerable time necessary to determine methods to increase adaptive capacity between the 3 disciplines? This Revision seems to be moving from the fairly straightforward integration of population and habitat goals to something far more complicated and ill-defined. Without more detail, it is difficult to commit to support. In general, we believe that we can accomplish these goals through increased communication and dialogue between the groups, perhaps with a small task group to facilitate that dialogue. It appears (page 26) that the Planning Committee intends for the ITT to tackle much of the work that we expected to be in this Revision, or the forthcoming action plan. We reiterate here that, if the ITT or another similar body is to be created, the Flyways must have explicit input and representation. The iterations should be reviewed by stakeholders, such as the Flyway Councils, as work proceeds. Many of the specific tasks proposed to be assigned to the ITT ("Next Steps," #3) are very broad and open to interpretation. Many of them may be exceedingly complex. Tasks ii, iv, and vi specifically need more detail. As these steps are taken, regardless of the form the group takes, stakeholders must be involved.

Other. The Indiana DNR, Division of Fish and Wildlife thank the Revision Steering Committee for the opportunity to comment on the draft NAWMP Revision. We would also like to thank the Plan Committee for carrying out the difficult work of drafting the Revision. Clearly much of the input garnered from workshops and the Waterfowl Summit has been incorporated in terms of the desired integration of harvest, habitat, and hunters. We found it more difficult than we expected to compile comments on the Revision. We feel it is too vague to give us a good feel for the direction that is being proposed regarding the practical aspects of waterfowl management during the life of this Revision. We recognize that details will be contained in the forthcoming action plan, but it is difficult to comment on this overarching document without seeing these details. Further, the timeline for the action plan is unclear: We do not know whether it will be forthcoming in the near future for review, or a result of the additional work outlined in the Revision. We believe that

assertions regarding the current inefficiencies and other problems inherent in waterfowl management are not well supported. While many of us in the management community have participated in this process over the past few years, many others have not been able to be included in those previous discussions, and certainly most of the public has not. Documentation of the perceived problems in our current system and how integration addresses them should play a more prominent role in discussing exactly why the changes described are necessary. The lack of any mention of biology, ecology, and conservation of waterfowl in a plan that focuses on these topics is disconcerting. Indeed, the focus seems to be on generalities regarding the management paradigm rather than on the birds. The general public would find little in this revision to inspire participation in waterfowl conservation. While we recognize that this is not the primary purpose of this Revision, we feel that it is an important omission that should be corrected. We have responded to the Planning Committee's specific areas of focus for the comments below. We hope that they are useful and that they contribute to the success of this Revision of the NAWMP. Again, the Indiana Division of Fish and Wildlife would like to thank all involved for your hard work during the revision process. We hope that the feedback you receive allows for the creation of a strong final document to lead the way in waterfowl management and conservation for years to come.



**INTERMOUNTAIN WEST  
JOINT VENTURE**

*conserving habitats through partnerships*

September 26, 2011

To: NAWMP Revision Steering Committee

From: Intermountain West Joint Venture Management Board

Subject: 2012 NAWMP Revision

The Intermountain West Joint Venture (IWJV) appreciates the opportunity to comment on the North American Waterfowl Management Plan (NAWMP) 2012 Revision. The IWJV recognizes the significant challenges associated with developing a visionary new approach to waterfowl conservation in North America and applauds the Revision Steering Committee for its considerable effort in developing a sound roadmap for the future of the waterfowl management enterprise.

The IWJV supports the purpose statement and fundamental goals identified in the Revision. The Revision establishes, from the outset, a remarkably clear vision that is framed by three powerful fundamental goals. We applaud the committee for its painstaking work over the last two years to extract these fundamental goals from the waterfowl community – they are accurate, simple, and defensible. As such, we strongly endorse the over-arching vision of integrated waterfowl management. We agree that harvest management, habitat management, and human dimensions are inherently connected and that strengthening these linkages will enhance the effectiveness of waterfowl conservation over the long term. We acknowledge that this is a bold and visionary step forward that will take time to mature due to the institutional structures and cultures of the various segments of the Plan Community.

However, as one of the 21 Habitat Joint Ventures in North America that have collectively been at the core of Plan implementation for a quarter century, we also believe that the Plan Committee and Revision Steering Committee must not lose sight of what has made NAWMP one of the most successful wildlife conservation movements in history – specifically, that its success has stemmed from an ambitious, science-based, straight-forward, and *inspiring* waterfowl habitat conservation plan.

For 25 years, the Plan has been the “call to action” that motivated diverse and powerful alliances to come together and implement strategic, landscape-scale habitat conservation. It

has been the *habitat plan* for waterfowl and the guiding light for Joint Ventures. Armed with NAWMP population objectives and a strong dose of inspiration from the Plan, JVs have stepped down continental objectives to the ecoregional and local scales and built a foundation for science-based conservation delivery that is the envy of almost every national wildlife conservation initiative currently operating in North America. It is in this light that we find the most glaring weaknesses of the current Revision including a diminished attention to habitat conservation needs in a way that inspires the waterfowl community to action.

In support of strengthening the Revision, we offer the following suggestions:

1. **The Waterfowl Habitat Plan:** Foremost, the Revision must provide science-based direction for waterfowl habitat conservation. It must identify waterfowl population objectives, challenges, and contemporary approaches to address the emerging threats to North America's waterfowl habitat. The current draft lacks these elements almost entirely. The depiction of biological and ecological needs of waterfowl, within the continental context, is critical to the revision of JV Implementation Plans and the continued improvement of our habitat conservation performance. Population objectives, arguably the core underpinning of NAWMP for a quarter century, are included as an Appendix, as if an after-thought. We understand that the "three-legged stool" integration called for in the Revision may warrant updating the population objectives over the next few years, and that may be the reason for downplaying population objectives in the current draft, but if this Plan is to be released in 2012 it should include a robust section describing the current population objectives, whatever those population objectives are at the time. While this Revision will inherently be more than a waterfowl *habitat plan* – it also deals with harvest management and human dimensions – it is imperative that the Revision includes detailed and up-to-date guidance that motivates habitat conservation action. Eight years have passed since the 2004 Plan Update and it is very likely that it will take the next 2-7 years to work out the structure and processes of the integrated waterfowl management construct, as defined in the current draft. That means that we could encounter a gap of 10-15 years between true waterfowl habitat plans, hardly a good way to maintain interest and commitment for waterfowl habitat conservation. The IWJV suggests that this issue could be resolved by updating the 2004 Plan and including it as a companion document, as the Implementation Framework was for the Strategic Guidance in 2004, or by building key elements of past Plans into the Revision's Action Plan. The IWJV suggests the Revision highlight the successes of the NAWMP community and point out the most important large-scale conservation challenges the community is perceived to face over the next 3-5 years (e.g., rapid changes in agricultural production patterns, agricultural policy changes affecting Farm Bill conservation programs, energy development, climate change impacts).
2. **Inspiration:** The Revision, particularly through Goal #3, articulates the need for growing the support base for waterfowl habitat conservation by making connections between waterfowl habitat and ecological goods and services that benefit a broad segment of



society. We fully support and embrace the dual concept of Goal #3 (increase hunter numbers and also grow the support base), particularly as it relates to conserving waterfowl habitat through programs and funding sources that are politically supported by hunters but have objectives far broader than waterfowl habitat (e.g., the Wetlands Reserve Program, Conservation Reserve Program, Land and Water Conservation Fund). However, the current highly technical tone of the Revision is in direct conflict with making NAWMP relevant and compelling to the *other conservationists and citizens* that might *enjoy and actively support waterfowl and wetlands conservation* through these channels. The hallmark of the 1986 Plan and 2004 Strategic Guidance/Implementation Framework was that these plans *inspired* waterfowl habitat conservation and helped build powerful JV partnerships. If the Revision fails to inspire JV partnerships, and bring relevancy to waterfowl conservation, there is a good chance that JV partnerships will drift toward other birds, other habitats, and other issues – exactly the opposite outcome intended from a Plan that “re-visions” the waterfowl management enterprise. The IWJV suggests incorporating more information on the biological and ecological requirements of waterfowl within a continental perspective which will have more immediate utility to our partnerships.

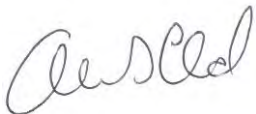
3. **Harvest and Habitat Management Integration:** The IWJV and other western JVs have improved linkages to the Pacific Flyway Council through development of a new Habitat Committee that recognizes the need to address the integration of the first two fundamental goals. As recognized by the Revision, JVs and Flyways have largely operated autonomously without a formal linkage between the institutions. Integration of these institutions will take time but we believe the Flyways and JVs are well poised to tackle the challenges of population management and habitat conservation as identified by the Joint Task Group. The IWJV believes that improving linkages between harvest management programs and habitat conservation initiatives will be critical to the success and relevancy of NAWMP in the future.
- **Implications of Integration to JVs:** While the IWJV agrees with the primary tenets of the Revision, we are challenged to fully understand the implications of this new paradigm for JVs. Certainly, JVs have the flexibility to adapt to changing political and ecological challenges. However, it is unclear what role JVs may be expected to play with a more centralized waterfowl management structure (i.e., ITT). We recognize that employing an integrated framework will be a dynamic process over the coming years and that it is very difficult to predict a final structure at this juncture. However, we suggest further consideration should be given to the potential implications of this integration for the current waterfowl management structure (i.e., JVs, Flyways).
- **Human Dimensions Funding:** The Revision implicitly calls for a greater investment in understanding of the satisfaction and motivations of our stakeholders, particularly hunters. This is an important endeavor that will provide improved insight for our waterfowl management programs. Development of a Human Dimension Working Group will likely be the most efficient means to address sociological questions surrounding waterfowl and wetland stakeholders. Integration of human dimension

components will need to be accomplished without jeopardizing resources for the other 2 legs of the stool. A redistribution of existing JV funds may not be warranted at a time when the JV community has struggled to find adequate funding to tackle many of the larger scale science needs regarding biological relationships between waterfowl populations and their habitats identified by the Joint Task Group and National Science Support Team. In an era of increased budgetary constraints and shifting priorities among federal agencies it is uncertain where additional revenues will be obtained for a new dimension in waterfowl planning and management. As the draft NAWMP Revision points to, the waterfowl community will need to be innovative to find additional funding resources to integrate the fundamental goals identified by the waterfowl community in the Revision.

- **Ecological Goods and Services:** We applaud the fact that the Revision illuminates the need to articulate the value of wetlands and other waterfowl habitats to society in terms of ecological goods and services. JVs have a proven track record of being creative and entrepreneurial in securing funds for core priorities. As such, JVs are the logical vehicle for addressing Goal #3 objectives related to building waterfowl habitat conservation into broader conservation initiatives and articulating the value of clean water and other ecological goods to society. Most JVs currently rely on programs and funding sources with natural resource conservation objectives broader than waterfowl to meet waterfowl habitat objectives (e.g., Farm Bill programs), so we would entertain playing a leadership role in this aspect of Goal #3. We strongly believe that this is the future of waterfowl habitat conservation (i.e., all the duck money in the world won't save ducks). We suggest re-wording certain components of the Revision (e.g., Principle #7, page 10) to articulate a potential JV role in this aspect of Goal #3.

We sincerely appreciate the opportunity to comment on the 2012 Plan Revision. We fundamentally believe that the NAWMP will continue to chart the course for science-driven, partnership-based wildlife habitat conservation. We are especially thankful to the Plan Committee for its strong engagement with JVs, and we look forward to aggressively supporting Plan implementation at multiple levels in the future.

Sincerely,



Alan Clark  
IWJV Management Board, Chair  
Utah Division of Wildlife Resources, Deputy Director

cc: Virgil Moore, IWJV Management Board, Vice Chair, Idaho DFG, Director  
Dave Smith, IWJV Coordinator  
Josh Vest, IWJV Science Coordinator



441 West Fifth Avenue, Suite 300  
Anchorage, AK 99501  
Tel: 907-276-7034  
Fax: 907-276-5069  
[www.audubonalaska.org](http://www.audubonalaska.org)

Re: Comments on the Draft North American Waterfowl Management Plan 2012

To whom it may concern:

Thank you for the invitation to review this draft plan. It is obvious that a great deal of thought and work has gone into this effort. The passion and commitment to waterfowl is evident on every page. I think the effort is excellent.

I am new to the waterfowl management plan, and do not hunt. But I enjoy waterfowl, support habitat conservation, and support hunting. I am perhaps typical of the growing segment of non-consumptive users the plan mentions.

The plan calls for bold action, but the problem requiring the bold action isn't quite clear to me. I understand habitat is being lost at a rapid rate, yet the numbers of breeding birds is very high. I understand hunters are declining, yet the harvest rates are very high. How is this? A few figures showing numbers of birds, amount of harvest, and acres of wetlands habitat in North America from 1950 to today would be very helpful.

I get the sense that one of the most serious concerns is the loss of hunters, and interest in hunting generally. I agree that is undesirable, but that trend reflects well-known societal changes. Is it realistic to expect waterfowl managers can change that? Certainly, work on retaining and recruiting new hunters, but success doesn't hinge on that. Play more to the demographic that is growing—the non-consumptive users. Plan to get them purchasing duck stamps, contributing to JVs, or accepting a tax on wildlife viewing equipment to help sustain the waterfowl we enjoy.

To that end, be sensitive in the plan about language. The plan, as written, seems aimed at hunters first, and mentions other users secondarily.

The document is process heavy. It includes much about need for integration, models, working multiple scales, engagement, study groups, task forces, metrics, and reports. Try to identify 5 specific problems facing waterfowl, followed by 5 specific actions (changes) this plan recommends to fix them. Put that in a table if possible.

This report will be hard to read for the average person. Consider drafting a supplement—a Readers Digest version-- that is no more than 3 pages. It should aim at a high-school reading level, and sit comfortably on the counter of the sporting goods store where it can be picked up and understood by our "customers".

Appendix B, Population status and abundance objectives, was very interesting to me.

As for your 9 specific questions, I repeat them followed by my comment, below.

1. The greatest challenges facing waterfowl management in the next decade.

Maintain habitat on the wintering grounds everywhere. Maintain habitat in the prairie-pothole region for breeding birds. Sustaining agency funding for monitoring and management

2. The appropriateness and relative importance of the three goals.

All 3 goals are good.

3. The most important, measurable objectives that would serve to accomplish the stated goals, and how to develop these.

High population abundance seems the best metric. Find out if the population is limited by habitat or harvest, and manage each accordingly.

4. The nature of useful objectives related to recruiting and retaining waterfowl hunters.

A worthy objective, but acknowledge we are fighting an uphill battle. Fifty years from now, waterfowl management will likely not be hunter driven.

5. The means to engage a broader constituency (i.e. beyond hunters) in the cause of waterfowl conservation.

This is an easy one. There is vast untapped potential here.

6. The concept of integrated waterfowl management and the greatest challenges/benefits likely associated with integration.

I confess the “lack of integration” problem was hard for me to understand.

7. Strategies that would make waterfowl management more efficient, effective and responsive.

Practice adaptive management. Broaden the constituency. Maintain agency funding (congressional lobbying). Do public outreach (social media, TV and Radio)

8. The necessity of changing or adapting our current institutions in order to implement the new NAWMP and the nature of the changes that may be warranted.

I don't think we need to “change institutions” necessarily. We have record waterfowl numbers, and record harvest. We are starting from a pretty good place on this revision.

9. The sufficiency of proposed recommendations and action steps to move this plan forward.

They are logical and sufficient. One might be more active in implementing changes, and learn through adaptive management. But this represents a good, forward-looking start.

In sum, you've done a good job with the draft plan. I hope these comments are helpful as you pull together the final document.

Sincerely,

Matthew Kirchhoff  
Director of Bird Conservation  
Audubon Alaska

# MISSISSIPPI FLYWAY COUNCIL

MISSISSIPPI FLYWAY COUNCIL



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22 September 2011

**TO: NAWMP Revision Steering Committee**

**FROM: Mississippi Flyway Council**

**RE: NAWMP Revision Comments**

The Mississippi Flyway Council thanks the Revision Steering Committee for the opportunity to comment on the draft NAWMP Revision. We would also like to thank the Plan Committee for carrying out the difficult work of drafting the Revision. Clearly much of the input garnered from workshops and the Waterfowl Summit has been incorporated in terms of the desired integration of harvest, habitat, and hunters.

We have many concerns regarding the draft as it is currently written. It was released during a period when much of our technical section is consumed with other duties, primarily the setting of waterfowl seasons. The short time frame available for comment (30 days) exacerbates this problem. It is difficult to coordinate commenting across the jurisdictions of the Mississippi Flyway without more time, particularly at this time of year. We fear that the comments we have been able to provide may be less useful than they might have been, given more time to coordinate internally.

We found it more difficult than we expected to compile comments on the Revision. We feel it is too vague to give us a good feel for the direction that is being proposed regarding the practical aspects of waterfowl management during the life of this Revision. We recognize that the details will be contained in the forthcoming action plan, but it is difficult to comment usefully on this overarching document without seeing these details. Further, the timeline for the action plan is unclear. We do not know whether it will be forthcoming in the near future for review, or a result of the additional work outlined in the Revision.

We believe that assertions regarding the current inefficiencies and other problems inherent in waterfowl management are not well supported. While many of us in the management community have participated in this process over the past few years, many others have not been able to be included in those previous discussions, and certainly most of the public has not. Documentation of the perceived problems in our current system and how integration addresses them should play a more prominent role in discussing exactly why the changes described are necessary.

The lack of any mention of biology, ecology, and conservation of waterfowl in a plan that focuses on these topics is disconcerting. Indeed, the focus seems to be on generalities regarding

the management paradigm rather than on the birds. The general public would find little in this revision by which to be inspired to participate in waterfowl conservation. While we recognize that this is not the primary purpose of this Revision, we feel that it is an important omission that should be corrected.

We have responded to the Planning Committee's specific areas of focus for the comments below. We hope that they are useful and that they contribute to the success of this Revision of the NAWMP.

**1. The greatest challenges facing waterfowl management in the next decade.**

It is not clear whether we are being asked for the greatest challenges to waterfowl, or the greatest challenges to waterfowl management. It seems implied that the Plan Committee feels that the greatest challenge to waterfowl management in the next decade is the lack of integration of harvest, habitat, and human dimensions aspects of waterfowl management. If that is indeed the implication, we reject it. We may not have a perfect system, but it has been adequate and is likely to continue to be adequate even if integration is not achieved. Without knowing the form that integration will take, it is impossible for us to comment on whether we believe it will be a change for the positive or the negative.

The greatest challenge facing *waterfowl* is clearly habitat loss and degradation (from CRP withdrawal, industrial destruction in the Arctic, etc.). Stress on federal budgets puts funding for conservation programs (such as that in the Farm Bill) at risk. Declining hunter numbers decrease funds available through license and duck stamp sales, as well as degrading interest in and support for our work among the public.

The greatest challenges facing *waterfowl management* are likely fiscal concerns. State and federal budgets do not seem to be recovering, putting a strain on the work we are able to do on the ground (surveys, habitat acquisition) and our ability to coordinate (travel restrictions in state agencies, for instance). Much of the work we do does not relate well to teleconferencing or other technological means of discussion. Attendance at Mississippi Flyway Council meetings has declined in recent years, restricting exchanges within of the waterfowl management community.

**2. The appropriateness and relative importance of the three goals.**

The three goals are all appropriate, and are listed in what we think is the appropriate order of importance. It is not clear that goal 1 (populations) is achievable without goal 2 (habitat). It is also not clear that advocacy and financial support necessarily follow from goal 3 (growing supporters), unless the definition of "actively support" includes membership in conservation organizations, buying duck stamps and/or hunting licenses, or similar requirements.

**3. The most important, measurable objectives that would serve to accomplish the stated goals, and how to develop these.**

Population goals are the most important and the most easily measured. We understand that the desire for habitat and harvest to be linked through population goals is what spurred this Revision. However, it remains unclear to us what the interface between harvest and habitat will look like, in terms of the actual regulation of hunting. While these first two goals (populations and habitat) are closely linked, we do not believe we greatly affect duck populations through hunting regulations. Habitat on the breeding grounds, in particular, should be our focus.

Presumably much of the early work (once the Revision is adopted) will focus on relating yield curves/habitat to shoulder points/harvest. This is one of the more important ideas we were hoping to see in this revision. We are concerned that this Plan may be going far beyond these basic needs in too complicated a manner. Determining how this work is to be accomplished will require tight coordination with the states through the Flyway system.

Regarding the final goal, we need to formulate measurable objectives that define “growing” numbers of hunters and conservationists. As for what metrics to use (stamp sales for hunters, amount donated by other groups, etc.), these require much more consideration than we can give here. This is likely an important starting point for the Human Dimensions Working Group.

**4. The nature of useful objectives related to recruiting and retaining waterfowl hunters.**

The nature of useful objectives related to recruitment and retention of waterfowlers is that specific objectives are not currently known—certainly current information on this subject is sparse. How do we measure hunters retained or recruited? How do we track them? We are aware of some ongoing work (in Illinois, for instance) on surveys that may begin to provide measurable metrics on recruitment and retention. Duck stamp sales can be a useful metric to some extent, but not necessarily one that is specific to recruitment or retention. Each state has idiosyncrasies in its licensing system that likely make it difficult to combine information across states—in some cases, it makes it virtually impossible to even estimate hunter numbers within a state. HIP registrations within a state can be useful but cannot be simply summed because of the requirement to register in all states in which one hunts. Adding a question to the HIP survey (other states in which one registered or is planning to register in a given year) may allow us to get at that more reliably.

It may not be within our power to address the large-scale societal issues that are driving the decrease in hunting. The first question may be why people have quit hunting and concentrate on how we can affect those factors. The crucial follow-up to this is why new waterfowlers start hunting. Having answers to this will help us understand how we can make access to the sport easier for all (not just youth). It is clear that we cannot affect



recruitment and retention with higher populations of ducks and better habitat, so these aspects of why people start and quit hunting will help us address declines in hunting from both ends.

We believe that the state/province is the appropriate level for recruitment and retention efforts. A national or international working group or committee would necessarily be so broad that, while it may be able to offer very useful help and guidance, it would likely be ineffective at recruitment and retention efforts in its own right. It is unclear whether this (a national or international group working directly on recruitment and retention) is the intent of the Plan—again, without more details, it is difficult to comment on this aspect. A national marketing campaign may be an example of how a national group could help support local efforts.

Even if we could somehow measure recruitment and retention, would it ever be measured as something other than a negative number? We do not know whether a net gain of waterfowl hunters is realistic, but we agree that measurable objectives are important before we can begin addressing the problem.

**5. The means to engage a broader constituency (i.e. beyond hunters) in the cause of waterfowl conservation.**

We do not even engage hunters as well as we should and we have little experience with those outside our circle—we only engage people that come to us. It is a good question, but not one we have answered effectively. There may be expertise within natural resources agencies (or even within the larger frameworks of state/federal/provincial governments) that is not currently being tapped by waterfowl managers, in terms of outreach and public interactions, that could be helpful in these endeavors. We need to share our goals with these other agencies and individuals to show that many of our goals are not mutually exclusive. In addition, we need to determine exactly what it is we are asking of this “broader constituency,” whether that is fiscal support, political support, both, or something else.

The real question seems to be how to get non-hunters to help “foot the bill” for waterfowl, so to speak. It is a difficult question for two reasons. One is that we do not know how to engage these people effectively, as already mentioned. The second, and probably as important, is a sense of distrust among hunters at involving non-hunters in these decision making processes. Hunters have thus far paid the majority of the way for waterfowl, and it is only fair, in our minds, to continue to put consumptive use at the forefront of waterfowl management. A growing non-hunting segment becoming involved in the user group could cause more conflict than solutions. Again, how this is carried out is critical, and harvest managers must be intimately involved in the planning of this process if it is to go forward and be successful.

**6. The concept of integrated waterfowl management and the greatest challenges/benefits likely associated with integration.**

The Revision fails to convince that integration will provide “benefits” and “efficiencies.” This is stated but not supported in any way, and no examples are given. We see integration as forming more bureaucracy that may impede the progress of each individual discipline and cannot see any gained efficiencies. Perhaps more confidence can be instilled with the forthcoming action plan, but the addition of more levels of oversight in the form of the proposed Integration Technical Team (ITT) seems counterproductive to the idea of streamlining waterfowl management.

**7. Strategies that would make waterfowl management more efficient, effective and responsive.**

Current waterfowl managers may be able to (and need to) recruit other administrative units and/or staff from their agencies to take on integrated functions (e.g., joint habitat management, land procurement, etc.). As mentioned above, there may be expertise within natural resource agencies (or even outside these agencies but inside state/provincial/federal governments) that is currently untapped by waterfowl managers, but that could be helpful.

We need clear population goals given certain habitat conditions. We need to determine habitat needs to achieve these goals while recognizing that weather has a major uncontrollable effect on both habitats and populations. We need to explicitly recognize that we have little control over population levels through harvest. These should be common goals between the harvest and habitat communities.

We need human dimensions information, not modeling. We need to understand the motivations of hunters so we can understand how to affect them positively with the goal of retaining as many hunters as possible. We need information to help determine strategies to recruit new hunters.

We need to work to ensure the security of current funding sources for habitat conservation and identify new ones. New funding sources could be supported by new and/or non-hunter groups.

**8. The necessity of changing or adapting our current institutions in order to implement the new NAWMP and the nature of the changes that may be warranted.**

We do not see gross inefficiencies in the current system and feel that the document does not do a good job of illustrating them. Assertions that there are efficiencies and benefits to be gained from integration are not supported with documentation or examples. The form that the integration mentioned so often in the document would take is not clear. It is difficult to approve or disapprove of such a broad vision without having more detail as to how that vision will be realized. At this time, we do not believe there is a need to change the institutions in place.

We think that the ITT, as laid out in the plan, is a step in the wrong direction. We note that there is no representation given to the Flyways, other than such as may be in place on the NSST, HMGW, and HDWG. We believe that the states should have explicit input through Flyway representation if an ITT-like body is formed. Until more detail is provided in the action plan, we cannot support the ITT concept. However, we believe that a task group, appointed jointly by the Plan Committee with representation selected from and by the Flyways and other stakeholders, could begin work on integration of population and habitat goals.

It is important to examine our population goals related to environmental conditions. The Joint Task Group Report acknowledges that “average environmental conditions” was based on a period of above average precipitation. Under average environmental conditions, the established population goals are unrealistic without major improvements in habitat over a vast area. These improvements are unlikely, given current funding levels, agricultural changes, and other uncontrollable societal changes.

**9. The sufficiency of proposed recommendations and action steps to move this plan forward.**

It is difficult to determine whether the proposed recommendations are sufficient, because many of them are couched in such broad terms. For instance, we have difficulty grasping how “linkages” can be “actively managed.”

Much of what is recommended involves simply accepting the vision of this Revision (“adopt,” “embrace”), despite the case not having been made that integration will be of benefit—what are the specific problems that our current paradigm experiences, and how will integration correct them?

Regarding the recommendations under “Confronting the Changing Social Landscape”, we support the formation of the Human Dimensions Working Group and the associated tasks. However, we feel the group should concentrate initially on hunter recruitment and retention, rather than on complex conceptual integration models.

We agree with the desire to formulate common goals and objectives but prefer to work within our respective systems to achieve them. Reviewing how we do things is critical, but do we need to spend the considerable time necessary to determine methods to increase adaptive capacity between the 3 disciplines? This Revision seems to be moving from the fairly straightforward integration of population and habitat goals to something far more complicated and less well-defined. Without more detail, it is difficult to commit to support. In general, we believe that we can accomplish these goals through increased communication and dialogue between the groups, perhaps with a small task group to facilitate that dialogue.

It appears (page 26) that the Planning Committee intends for the ITT to tackle much of the work that we expected to be in this Revision, or the forthcoming action plan. We

reiterate here that, if the ITT or another similar body is to be created, the Flyways must have explicit input and representation. The iterations should be reviewed by stakeholders, such as the Flyway Councils, as work proceeds. Many of the specific tasks proposed to be assigned to the ITT ("Next Steps, #3) are very broad and open to interpretation. Many of them may be exceedingly complex. Tasks ii, iv, and vi specifically need more detail. As these steps are taken, regardless of the form the group takes, stakeholders must be involved.

Again, the Mississippi Flyway would like to say thanks to all involved for your hard work during the revision process. We hope that the feedback you receive allows for the creation of a strong final document to lead the way in waterfowl management and conservation for years to come.

Sincerely,

A handwritten signature in black ink, appearing to read "John Buhnerkempe", with a stylized flourish at the end.

John Buhnerkempe, Chair  
Mississippi Flyway Council

cc: Jim Kelley

September 21, 2011

To: NAWMP Revision Steering Committee

From: Min T. Huang, Migratory Gamebird Program Leader, CT Dept. of Energy and Environmental Protection

Subject: Comments on NAWMP Revision

I would like to commend the Committee on the work they have conducted on the Revision. It is clearly a big task, though it pales in comparison to achieving the vision that the Revision outlines. In general, I support the 3 fundamental objectives of the Plan and also agree that integration of the waterfowl management community, in the long run, is needed. However, I do not believe that delving into the morass of human dimensions at this point in time, is a path that we should be going down. It will be difficult enough for us to integrate the objectives of the habitat and harvest communities, let alone try and add another cog about which we know very little. Hunter recruitment and retention is a state and local issue, and should remain as such. A waterfowl management plan will not result in more duck hunters. Changing the current social climate, improving local hunting access, and strong mentoring programs at the local level may result in increased hunter numbers. An improved economic climate will certainly allow more existing hunters to become new waterfowl hunters.

It is worthy of us to strive to include a broader constituency, certainly to have other users of the resource pay into its stewardship as the hunting community has and continues to do. I have many doubts, however, as to how NAWMP can achieve this (develop a new funding base). We have yet to figure out how to increase funding for non-game species in the U.S., do we think that we can rely upon these same user groups to help fund a suite of hunted species?

I was dismayed to see that the current draft of the Plan spends most of its time discussing process and institutions rather than focusing on the populations and habitats that constitute why we have a waterfowl management community and a constituency that we answer to. I fear that by focusing on process and institutions that the central message of NAWMP is lost, particularly to those new partners that the Revision strives to reach. Furthermore, the Revision, as written, seems to target the scientific community, not the lay person, whom it seems the Revision really wants to include as a partner. Despite the new vision for the Plan, the biology has and always will be at the core of our enterprise and it is the birds and habitats, not the institutions and processes that our new hoped for constituency is enamoured of. The greatest threat to waterfowl is the continued erosion of the habitat base from both the political front and continued changes on the ground. Shifting budgetary priorities and legislative agendas may result in drastic detrimental changes to the wetlands and associated uplands that our waterfowl resource relies upon. However, only cursory mention of habitats and habitat protection is given within the text of the Revision.

As we move forward with formal integration, the Federal agencies need to take the lead in allocating existing resources to achieve the technical and policy decisions that lie in front of us. Envisioned efficiencies will not be realized by creating more bureaucracies and entities. The

technical capacity currently exists within the various working groups (e.g. HMWG, NSST) and Plan partners (e.g. state agencies, NGO's) to develop integrated models, at least on the habitat and harvest management side of the equation. Given the resources to fully develop these ideas, instead of working on them in their 'spare' time, would result in meaningful, useful tools that could be then used in a broader application. The technical working groups need guidance and marching orders from the Federal agencies and the Flyway Councils to begin the arduous task that lies ahead. This will entail a clear and unambiguous change in priorities and tasks.

Thank you for the opportunity to comment on the Revision to date.

Sincerely,

Min T. Huang, Migratory Gamebird Program Leader  
CT Dept. of Energy and Environmental Protection  
391 RT 32  
N. Franklin CT 06254  
860-642-6528 (p)  
860-642-7964 (f)

Nancy Hillstrand  
Box 7  
Seldovia Alaska 99663  
[www.seaducks.org](http://www.seaducks.org)  
Greetings

Thank-you for taking the time to read my comments. Some comments, you may feel are controversial because managers have a hard time hearing what the public perceives as their truth. I write from my own experience from being treated rather poorly during deliberations in the State Management process by attempting to prevent localized depletions and growing birds back where they were drastically removed from fish charter outfitters over the past 30 years.

I live in the bush purposely to be able to observe birds and wildlife and have for 38 years so I have a unique front row perspective not available to those who live in the city and venture out occasionally. I purchase thousands of dollars in equipment, travel far and wide to observe waterfowl, Purchase medallion editions of Duck stamps and prints, Contribute thousands to Ducks Unlimited Canada and own many rifles shotguns and handguns. I am most definitely a contributor of the waterfowl resource yet I have no rights as a shareholder.

This “bird’s eye view” of boat shooting practices, jump shooting from points in my bay while birds are herded into the gunners, closing off of the narrow bay I live in with boats and decoys in front of my house, and the removal of over 100 Barrows Goldeneye surf Scoters and harlequin per day so now we count them in teens instead of hundreds, (and they have not grown back for 17 years now and counting) has had the tendency I admit, to taint my view of sea duck hunting.

This most certainly is not the traditional actions of the true waterfowler that I was brought up with. The lack of respect and regard for the birds and for me by the state waterfowl managers for my rights as a citizen to be allowed to study, observe and photograph these birds in front of my home has no doubt coloured my comments.

I do believe my comments are accurate and I am in hopes that since this is the North American Waterfowl Management Plan that my comments will be given some weight and possibly the problems I see can come to solution so all Americans who love waterfowl will have the fair and equitable opportunity to observe these beautiful birds without the sad ending of watching them get slaughtered in front of a hard earned home. From this revision, it appears that others have noticed these problems also.

The bright side of this is that it has spurred me into being an avid researcher of the current literature on all aspects of Mergini science and management. I get involved, and have spent thousands upon thousands of dollars in bringing this literature to our Board of Game in Alaska.

This body does and has gained some knowledge of waterfowl biology, regardless of the fierce opposition of the State waterfowl manager. If this body could have unbiased science delivered to them, citizens like myself and harvesters could live in harmony by meaningful management that first and foremost promoted the sustainability of the birds then allocated this resource fairly and equitably so bays would remain robust with them and depletions would be curtailed so all could enjoy them into the future.

There are problems before us in Alaska. The depletions and endangered status attests to these problems. Careful flexible management that utilizes our state system, is willing to look at new science, admits H.I.P. is faulty, considers management by Game Management Units like all our other wildlife is managed would be a start in more comprehensive management. The State can and has set the precedent for setting wildlife regulations separately for Subsistence, personal use, sport of trophy, and commercial hunting. Since responsibility rests with USFWS and these are federally protected birds, it is important that birds be managed for all species and populations as well as all Americans, then all waterfowl can have a fair shake not just geese and dabblers and not just the harvester running roughshod over the homeowner.

I believe harvesting waterfowl will always be available for those who hunt for food if we take care of them and protect them from those who are simply sighting in their shotguns and using them for skeet shooting. Managers need to be educating these gunners rather than joining them in unsustainable shooting. Again thank-you kindly for listening and I mean no offense, I simply want the sight and sounds of robust populations of sea ducks to once again grace my bay.

With Kind Regards,

Nancy Hillstrand

## **1. THE GREATEST CHALLENGES FACING WATERFOWL MANAGEMENT IN THE NEXT DECADE**

### **A. Human population growth**

- Disturbance and harvest by Motorized boat
- Disturbance and displacement by sprawl into remote habitats
- Habitats utilized to “grow” biofuel energy
- Offshore drilling in the Arctic and offshore for energy
- Oil and chemical spills

### **B. Habitat loss and degradation in high latitudes**

- High Latitude, Arctic and subarctic habitats need assessment and synthesis
- High latitude Joint Venture is needed to synthesize habitat, climate & weather oscillations zones of temp. water temp, precipitation, ice pack, ice melt etc. affecting these habitats



- Out of sight out of mind for high latitude habitats causes crisis management
- Exploitation a mounting concern in high latitude habitats
- Arctic oil exploration and drilling
- Oil spills in high latitudes in coastal marine habitats
- Permafrost melting
- High latitude tundra and taiga wetlands disappearing

#### **C. Disconnect between management and *current* biologically based research**

- New research is delayed in reaching management so there is a lag or denial
- Obsolete belief systems stand in the way of new thought patterns and waterfowl needs

#### **D. Preferred Species bias by managers**

- A disconnect from MBTA “each species and recognized population”
- declining migratory birds falling through the cracks if not favorite of harvester
- subjective regulations not biologically based for less favored species
- Crisis management as non preferred species falter one by one
- crucial habitats of less preferred species get overlooked
- conflict of interest if manager prefers to hunt certain species and does not want bags lowered
- Impairment and prejudice in regulatory decision
- Removes the fine tuning State management can have to promote sustainability if manager denies science

#### **E. Preferred Habitat bias by managers**

- *Non-traditional* habitats such as Arctic or marine, are neglected
- Disconnect from critical breeding grounds other than the PPR
- Dismissal of crucial marine wintering grounds

#### **F. Bias of “Traditional” management toward special interest**

- unequal contribution mechanism for all shareholders
- revenue generation potential lost due to bias toward preferred user
- unconstitutional preference toward one user
- fear of lobbying special interest single constituency

#### **G. Overall population management may not promote sustainability to all Tribes**

- Ignores localized depletions
- neglects resident species
- Removes the fine tuning State management can have to promote local sustainability.

## **Climate**

- Climatic oscillations
- permafrost melting and wetland disappearance in Arctic
- thermal pollution
- acidification

## **Biologically unique Tribes of “ducks” are not differentiated**

- Imprecision of using dabbling biology subjectively as if interchangeable for all Tribes
- Vocabulary of "ducks", geese and swans is obsolete.
- all “ducks” are lost in dabbling biology
- Generic vocabulary used by our top Waterfowl specialists causes biological inaccuracy
- “duck” does not educate waterfowl shareholders of the plight or biology of our different Tribes
- Manage each Tribe of “duck” for unique characteristics and habitats like geese and swans

## **Declining Tribe Mergini managed subjectively in Alaska**

- SDJV and the valuable available science produced, is disconnected from management
- unique habitats not discerned or delineated for sea ducks
- Very Liberal harvest of 18 sea ducks/ day 44/ possession sanctioned without science or species differentiation while in long term declining trend.
- Focus on Endangered Stellers and Spectacled Eiders has minimized remaining species
- Crisis management from one declining species to the next is the norm
- K-selected reproductive strategy not acknowledged by management
- Crucial Non breeding and wintering life-stage generally dismissed
- Inaccurate H.I.P. is primary parameter utilized so MBTA “due regard” for zones of temp, breeding habits, distribution, abundance, times and lines of flight are not considered
- precautionary principal disregarded in Alaska
- Mergini species not differentiated, management is guesswork at best.
- Mergini lumped in with dabblers so biology obscured
- Adaptive Harvest Management using r-selected dabblers,(mallard) is imprecisely, subjectively, and dangerously applied to K-selected diver Tribe Mergini.
- Dynamics of high latitude and marine 25 fathoms or less habitats not acknowledged
- NAWMP uses obscure inappropriate reference to waterbird habitats (Kushlan 2002)
- Map of accurate marine habitats 25 fathoms or less omitted from NAWMP documents

## **H.I.P. is faulty and subjective when used for Other Tribes than Anatini especially in Alaska**

- H.I.P. in Alaska is inaccurate yet used as gospel. (example zero Eiders tallied in Alaska.)
- H.I.P. does not differentiate species so State management cannot manage appropriately
- Preferred Species bias by managers lacks oversight and impairs regulatory decision results

## **2. THE APPROPRIATENESS AND RELATIVE IMPORTANCE OF THE 3 GOALS**

It is inappropriate for the 3 fundamental goals of NAWMP to single out special interests. The goals must be to support Waterfowl Conservation and garner support from all Americans.

### **GOAL NUMBER 1 SEGREGATES THE AMERICAN PEOPLE. IT STATES:**

*"Abundant and resilient waterfowl populations to support hunting and other uses without imperiling habitat."*

### **PLEASE REVISE GOAL NUMBER 1 TO SERVE ALL AMERICAN CITIZENS MORE EQUITABLY:**

*"Abundant and resilient waterfowl populations to support all traditional uses without imperiling habitat"*

*Or*

*"Abundant and resilient waterfowl populations to support the study, observance, feeding, photography, and harvesting without imperiling habitat."*

Please revise to clearly represent all constituents that "use" the waterfowl. To signify one lone use, ranks and categorizes special interest against other citizens. It creates sides and contention.

"Other uses" awkwardly places associated constituents in an inferior rank and does not serve the vision or intent of gathering new revenue for conservation.

- **EXECUTIVE ORDER # 13186** states: "Migratory birds are of great ecological and economic value to this country and to other countries. They contribute to biological diversity and bring tremendous enjoyment to MILLIONS OF AMERICANS WHO STUDY, WATCH, FEED, OR HUNT THESE BIRDS throughout the United States and other countries. The United States has recognized the critical importance of this shared resource by ratifying international, bilateral conventions for the conservation of migratory birds."
- **THE MISSION OF THE U.S. FISH AND WILDLIFE SERVICE:** working with others to conserve, protect and enhance fish, wildlife, plants and their habitats for the CONTINUING BENEFIT OF THE AMERICAN PEOPLE
- **TITLE 16 – CONSERVATION CHAPTER 64 - NORTH AMERICAN WETLANDS CONSERVATION SEC. 4401.** Findings and statement of purpose-STATUTE- (a) Findings The Congress finds and declares that – (1) the maintenance of healthy populations of *migratory birds* in North America is dependent on the protection, restoration, and management of wetland ecosystems and associated habitats in Canada, as well as in the United States and Mexico. (2) wetland ecosystems provide essential and significant habitat FOR RECREATIONAL, SCIENTIFIC, AND AESTHETIC VALUES;

Recognition of this diverse force of millions of Americans equitably and proudly has the potential of generating revenue for waterfowl conservation. These same diverse constituencies created the MBTA. Bird observers lobbied for the first Wildlife Refuge at Florida's Pelican

Island in 1903. Most other initiatives are a combined effort for conservation by all shareholders. Now is not the time to alienate any users and join all together.

**BIRDERS HAVE CONTRIBUTED BILLIONS INTO OUR ECONOMY**, without money spent from USFWS, to urge or grow supporters, The “economic value” (**MBTA, 1918**) this constituency contributes annually to the U.S economy is staggering.

- \$82 billion in total industry output,
- \$12 billion on trip expenditures,
- \$24 billion on equipment,
- 671,000 jobs
- \$28 Billion in Payroll and
- \$11 billion in local, state and federal tax revenue

(USFWS, **Birding in the United States: A Demographic and Economic Analysis, July 2009**) :

#### **VISITORS TO WILDLIFE REFUGES**

- 34.8 million people visited National Wildlife Refuges located in the continental U.S,
- 82% of all visitors to Wildlife Refuges are wildlife watchers
- 77% of this 82% are shareholders coming primarily to watch waterfowl.

(USFWS, **Federal Duck Stamp Office: Information, 2010**)

**WILDLIFE REFUGE WATERFOWL WATCHERS PURCHASE DUCK STAMPS** to gain entry into the refuges and wear them as a badge of honor

- These refuge visitors generated:
  - \$1.7 billion of sales in regional economies.
  - 27,000 people employed
  - \$542.8 million in payroll
  - \$185.3 million in local state and federal tax

(FWS **Refuge Annual Performance Plan, RAPP**)

(**Banking on Nature 2006: The economic benefits to local communities of NWR Visitation**)

Today, Waterfowl-observation study, painting, and photography remains an important tradition for millions of Americans as evidenced by the financial statistics above. This constituency needs acknowledgement equitably in this NAWMP.

The harvester holds a prominent place in the history of management. However, birdwatchers and photographers contributed 80 Billion more than waterfowl harvesters into our economy.

It is counterproductive, in the changing climate of the 21<sup>st</sup> century, to alienate and delay this obtainable enormous revenue generator when the goal is to raise money for desperately needed conservation. We must raise above the special interest and join together.

It is offensive to be large contributors for waterfowl, their habitats, and our economy with years of medallion editions of the Federal Conservation Duck stamp, countless hours spent with the congressional Delegation, and working on habitat issues to not be considered by who we are side by side with the harvester as one force for conservation.

## **GOAL NUMBER 2 STATES:**

*“Wetlands and related habitats sufficient to sustain waterfowl populations at desired levels, while providing places to recreate and ecological services that benefit society”*

This goal is great! This goal thankfully comprehensively recognizes benefits for all society equitably for all Americans as mission statements and Laws mandate.

Thank-you kindly for the recognition of us all in this goal.

Hopefully the definition of "related habitats" includes

- Marine near shore benthic habitats
- Boreal Forest- taiga
- High Latitude arctic and sub arctic

## **GOAL NUMBER 3 ONCE AGAIN DIVIDES AMERICANS BY STATING:**

*“Growing numbers of waterfowl hunters, other conservationists, and citizens who enjoy and actively support waterfowl and wetlands conservation”.*

## **GOAL NUMBER 3 CAN MORE EQUITABLY BE STATED:**

*“Growing numbers of all American conservationists who enjoy and actively support waterfowl and waterfowl habitat conservation:*

We are not mere "Other" conservationists. We are conservationists. Harvesters, birdwatchers, photographers, artists, farmers and researchers. All conservationists. It is rude and offensive to be ranked..."other". It signifies a condescending separation that is not appropriate when dealing with the American people. It smacks of “Those guys over there who don't amount to much.” All who are conservationists must be equitably recruited as a force that must stand up for waterfowl conservation.

To continue to segregate the American people delays revenue generation opportunities. It divides us. The job is to provide the opportunity for all to contribute to support sustainability of our waterfowl.

All conservationists require a prominent seat at the table so we can contribute clearly and be counted equitably out in the open. There has not been a revenue generation platform that shows the clear intent of all conservationists. Contributions from conservationists that do not harvest, have continuously been obscured under initiatives dedicated solely for harvesters. It is time for an in depth economic analysis that tallies all contributions

Welcome us all together. Don't be fearful to name and acknowledge all. The harvester must begin to realize that it is unconstitutional to continue to hold wildlife as a special privilege for a select few. We all have this privilege together as equal partners in the Waterfowl resource.

Thank-you for your time  
With Kind Regards,  
Nancy Hillstrand



**3. THE MOST IMPORTANT, MEASURABLE OBJECTIVES THAT WOULD SERVE TO ACCOMPLISH THE STATED GOALS, AND HOW TO DEVELOP THESE**

1. Focus on new revenue through creative marketing
2. Discontinue the alienation of the largest constituency of waterfowl
3. Join all Americans together as a force to support waterfowl,
4. Stop playing favoritism chasing old money to promote conservation
5. Ducks Unlimited can be for all Americans. New sponsors and advertisers are available if they are not alienated.

**4. THE NATURE OF USEFUL OBJECTIVES RELATED TO RECRUITING AND RETAINING WATERFOWL HUNTERS**

Hunting is a family tradition. It is not up to our government to take sides and promote one use against another. All Americans is the Mission of the USFWS so that must be the focus.

Time and taxpayer resources would be better spent to welcome all contributors especially those already willing stakeholders that hunt with a camera and their eyes. To continuing to solely solicit and beat the dead horse of dwindling harvesters will only delay the crucial need of revenue from us all.

Please don't miss this very critical opportunity of gathering revenue from the very real, already ready willing and able with money to contribute present constituency. Effort needs to be devoted:

- the 43 million birdwatchers
- the 70 million wildlife viewers
- Art contests
- Photography contests
- Outdoor youth programs
- Schools kindergarten and up
- Girl Scouts of America
- Boy Scouts of America

instead of begging the minority of 1 million people to continue harvesting. It seems counter intuitive and a waste of our tax dollars devoted to one lone constituency. Please give more credit where credit is due.

**FOCUS ON NEW REVENUE!**

**5. THE MEANS TO ENGAGE A BROADER CONSTITUENCY (I.E. BEYOND HUNTERS) IN THE CAUSE OF WATERFOWL CONSERVATION**

1. **FIRST, INCLUDE ALL AMERICANS EQUITABLY WITHOUT DIVISION, IN THIS NAWMP.**

Please, rise above this bias of the “traditional,” us against them, polarized atmosphere created by apparent special interest bias and alliance on behalf of one group. The Fundamental 3 Goals and Renewed Mission Statement sets up a negative polarity that delays engagement of a broader constituency. One side winner the rest loser is causing wildlife divisions to go broke. This obsolete favoritism will delay the joining together of the American people to contribute to the critical cause of all Migratory Birds and Habitat Conservation.



2. **CONTINUE SUSTAINED PRESSURE FOR TEAMING WITH WILDLIFE** would do more for Conservation because it would set up a fund that belonged to all Americans.
3. **THE MIGRATORY BIRD AND CONSERVATION STAMP (FEDERAL DUCK STAMP) MUST BE MARKETING TO ALL MORE EFFECTIVELY AND EFFICIENTLY.** Enhance marketing to educate the 48 million birders who are spending 82 Billion dollars into our economy. Raising awareness that this is for Wildlife Habitat purchased by all Americans will be a badge of honor. To continue to call it a hunting stamp again sets up polarity of one against the other.
4. **THIS IS THE 75<sup>TH</sup> YEAR OF THE NATIONAL WILDLIFE FEDERATION.** Ding darling created a cartoon that depicted ALL the shareholders when he created the duck stamp. Collaboration with NWF to bring their millions of members on line to purchase a commemorative Conservation and Habitat Stamp, magnet or pin would begin the opportunity to engage a broader constituency. When conservation is marketed to all stakeholders of migratory birds as a team effort, then, the American people will understand that we must ALL get behind this.
5. **AN IN DEPTH ECONOMIC IMPACT STATEMENT IS SORELY NEEDED THAT CAN TEASE OUT ALL CONTRIBUTORS OF REVENUE GENERATION FOR WATERFOWL AND THEIR HABITATS.**

Presently Americans who do not harvest waterfowl utilize revenue generation programs. The tally is geared to show harvester contribution. This Contributors are obscured is vague and data forfeits meaningful information due to agency marketing. Those who do not harvest though contribute are not counted accurately. For instance:

**PITTMAN-ROBERTSON ACT FUNDS** Many Americans purchase firearms but do not harvest wildlife or waterfowl. This contribution must be deciphered to reflect generated revenues

**MIGRATORY BIRD AND CONSERVATION STAMPS** are purchased by Americans that do not harvest waterfowl. This contribution must be deciphered to reflect generated revenues.

**MIGRATORY BIRD AND CONSERVATION PRINT AND MEDALLION EDITIONS**

Are purchased by Americans that do not harvest waterfowl. This contribution must be deciphered to reflect generated revenues.

**HABITAT FOR CONSERVATION EASEMENTS** are purchased by Americans but they do not harvest waterfowl. This contribution must be deciphered to reflect generated revenues.

**HABITAT FOR CONSERVATION ARE PURCHASED BY ORGANIZATIONS** but contributors do not harvest waterfowl. This contribution must be deciphered to reflect generated revenues.

**DUCKS UNLIMITED US AND CANADA** donations are purchased by Americans but they do not harvest waterfowl. This contribution must be deciphered to reflect generated revenues.

**CONGRESSIONAL DELEGATION LOBBYING FOR WATERFOWL AND FOR HABITAT THAT BENEFITS WATERFOWL** is performed by many Americans but they do not harvest waterfowl. This contribution must be deciphered to reflect generated revenues.

**\*PLEASE SEE DRAFT WILDLIFE EXPENDITURE CHART ATTACHED**

**RE: NAWMP**

**7. STRATEGIES THAT WOULD MAKE WATERFOWL MANAGEMENT MORE EFFICIENT, EFFECTIVE AND RESPONSIVE**

**DEVELOP A NECESSARY:**

**TRIBE SPECIFIC STRATEGY FOR LESS PERFERRED OR UNDERSTOOD WATERFOWL.**

Greetings,

Depressed populations and species that are less preferred or understood, fall through the cracks of the Flyway Council and the SRC management. All species and populations are equally afforded protection under the Migratory Bird Treaty Act (MBTA), Article II of the Convention, executive order 13186, NEPA, and other Laws to restore depleted populations.

- Estimated abundance of Tribe Mergini generally has remained below the long term averages.
- Available data suggests that sustained long term declines have occurred to majority of species.
- Mergini, are not afforded comprehensive defensive safeguards
- Mergini require strategic assistance to minimize risk to this suite of K-selected birds
- K-selected Mergini cannot benefit from r-selected Anatini Adaptive Harvest Management

The Service preferred Stock strategy, addresses unique management challenges for

*“stocks deemed not biologically capable of sustaining the same harvest levels as mallards, or whose migration and distribution do not conform to patterns followed by mallards.”*

At first glance, this Stock Specific Alternative might be the answer to provide needed protection for depressed stocks of Tribe Mergini because:

- Tribe Mergini are not “biologically capable of sustaining the same harvest levels as mallards”.
- migration and distribution of Tribe Mergini do not conform to patterns followed by mallards

**However,**

**STOCK SPECIFIC HARVEST STRATEGY IS INADEQUATE FOR TRIBE MERGINI.**

because:

1. **too many species of Tribe Mergini have sustained decline**
2. **Species are not differentiated** from broad brush genera in current management
3. Prioritizing one stock at a time creates an **adverse domino effect that shifts harvest pressure** to remaining vulnerable species left out of a Stock Specific Strategy.

4. **K- selected diver Tribe Mergini have no protection under any Alternatives**
5. **Management must not be left to whim, budgets or bias of managers.**
6. Stock strategy for Mergini creates a constant putting out of fires instead of a more **comprehensive approach that looks at the entire Tribe** as a unique assemblage to understand where the problems are coming from and why.
7. Piecemeal stock strategy would fail to encompass due regard for Tribe Mergini unique breeding habits, zones of temperature, distributions times and lines of migration etc required by the MBTA
8. **near shore wintering habitats** (omitted in this NAWMP) are shared by all species of Tribe Mergini. One oil spill or one chemical spill has the potential impacts to the entire Tribe not just one stock.
9. **Candidates cannot be subjectively separately “deemed”** without serious due regard for sensitive characteristics mandated like zones of temperature, breeding habits, distributions and solid harvest data. **Deem one species and others would also have to be considered.**
10. No species of Tribe Mergini has ever been admitted into the exclusive Stock Strategy guild.
11. The desired silver bullet of a known set of conditions is unattainable in a dynamic oscillating oceanic, sub arctic and arctic world. Budgets can never cover the oceanographic variables needed.
12. We must err on the side of caution for a Tribe when trends are showing long term declines, endangered status, and extinction.

#### **TRIBE VULNERABILITY:**

The Stock Specific Alternative does not consciously consider Tribe, but please note the pattern of **TRIBE Vulnerability** when current stock- specific or Plan candidates are categorized by taxonomic Tribe.

<b><u>Tribe Anthyini</u></b>	<b><u>Tribe Anserini:</u></b>	<b><u>Tribe Cygnini</u></b>	<b><u>Tribe Cairinini</u></b>
Lesser scaup,	Canada Goose (most),	Tundra Swan	wood duck
Greater Scaup	White fronted goose,	Whooper Swan (closed)	
Canvasback	Brant	Trumpeter Swan (Plan)	

#### **RECOMMENDATION:**

##### **TRIBE SPECIFIC STRATEGY - USED FOR TRIBE MERGINI**

1. the same basic concept as the **exclusive** Stock-Specific Harvest Strategies but **inclusive** to incorporate entire Tribe.
2. Larger picture of biological, behavioral, physiological ecological and reproductive, **vulnerabilities considered within Tribe can be incorporated from SDJV research**

3. Provides inclusive **umbrella of added protection over entire Tribe** vulnerability.
4. Can be utilized **when majority of species within a Tribe** are *deemed not biologically capable of sustaining the same harvest levels as mallards or do not conform* to patterns followed by mallards
5. Tribe strategy can **minimize the crisis management** approach to picking off species one by one as they decline.
6. Each Tribe's habitat, reproductive strategy, environmental variation, harvest **uncertainty will be clearly delineated more comprehensive for management scrutiny** not obscured wallowing in scores of multiple species or other Tribes biological characteristics.
7. Tribe delineated habitats would **“move toward establishing increased meaningful coordination (coherence) between harvest and habitat management for migratory birds.”**
8. Tribe coherence, habitat coherence, breeding habit and management coherence. The hodge podge of separate species would be unified into a structure that pertains to each Tribes unique characteristics, habitats and food.
9. site fidelity on the wintering, molting or breeding habitats and the repercussions systematic localized depletions can have on overall populations of Mergini.
10. Bias would be minimized toward certain Tribes to remove the possible subjective "deeming" of changing managers through time.
11. If single species within these Tribes showed estimated abundance above long term averages for many years in a row proving biologically capable of sustaining the same harvest levels as mallards they could then be released into the frameworks with jointly managed dabblers but not until.
12. **Species within Tribe Strategy would be managed according to biological capability possibly using an r-K continuum.**
13. Vulnerable species **would not be exposed to subjective management** based on single component of inaccurate harvest data or science.
14. Management **would prove “due regard” to each species and population provided protection under the Migratory Bird Treaty Act** before being released into jointly managed more resilient dabbling model.
15. When the majority of a Tribe is under stress further protection is warranted
16. Suites of birds needing oversight would be organized.

17. **meaningful regulations would reflect MBTA** due regard for zones of temperature, breeding habits, oceanic habitats, abundance, distribution. times and lines of migration etc.
18. The **Tribe approach is warranted for protection and recovery for Mergini.**

**STOCK SPECIFIC HARVEST STRATEGIES MAY BE ADEQUATE FOR TRIBES THAT ARE AT OR ABOVE LONG TERM AVERAGES.**

**STOCK SPECIFIC HARVEST STRATEGIES OR TRIBE PERSPECTIVE**

- Cygnini** - protected under plans oversight similar to a Tribe Specific Strategy
- Anserini** - Most protected under plans oversight similar to a Tribe Specific Strategy
- Dendrocygnini** - How is this tribe doing? Benefit from Tribe specific oversight???
- Cairini** wood duck protected under stock strategy, other species?
- Anatini** - STOCK SPECIFIC STRATEGY SUFFICIENT
- AHM based on this Tribes strategy
  - population and sustainability dynamics generally understood
  - most species estimated abundance well above/ similar to long term averages.
  - r-selected breeding habits more able to compensate.
  - Rainfall so far adequate...
  - black duck, pintail protected under Stock Strategy and Plans
- Anthyini** - MAY BENEFIT FROM PROTECTIVE TRIBE SPECIFIC STRATEGY
- Canvasback, scaup presently protected by stock specific harvest strategy
  - Redhead and ring-necked duck abundance above long term averages.
  - Recommend TRIBE STRATEGY if majority of Tribe shows decline
  - Tribe Specific Strategy can work in concert with Stock Strategy
  - Added Tribe layer sweeps other similar vulnerable species into consideration
- Mergini** - **DEVELOP TRIBE SPECIFIC STRATEGY mainline to SDJV research**
- Oxyurini** - **DEVELOP TRIBE SPECIFIC STRATEGY** Stable only in 13-19, 20, 75-77?
- Family Raillidae** - **DEVELOP FAMILY SPECIFIC STRATEGY** for Family Rallidae
- **Some Rails appear to be in decline**
  - **Expand Harvest Strategy for Families of all migratory birds**

Thank-you for protecting “each species and recognized population of Migratory Birds for the benefit of all Americans”

With Sincere Regards,  
Nancy Hillstrand

**From:** coal point <fish@alaska.net>  
**Sent:** Monday, September 26, 2011 5:09 AM  
**To:** info@nawmprevision.org  
**Subject:** An expanded vision of looking at Waterfowl habitat

This is waterfowl breeding habitat. It is time to revise our vision to recognize the importance of high latitudes in the NAWMP process. The high latitudes are in a time of great change and somehow we must expand and incorporate these habitats comprehensively into the NAWMP. We must synthesis what so many agencies are working on right now into a High Latitude Habitat Joint Venture.



arctic\_conservation\_area\_caff\_topographic\_map[1]

Thank-you  
Nancy Hickson  
Box 67  
Port Lions Alaska 99550



---

**From:** coal point <fish@alaska.net>  
**Sent:** Monday, September 26, 2011 5:01 AM  
**To:** info@nawmprevision.org  
**Subject:** Emailing: arctic-conservation-area-caff-topographic-map.jpg  
**Attachments:** arctic-conservation-area-caff-topographic-map.jpg

This is the area of a High latitude joint venture to recognize waterfowl breeding areas

Thank-you

Nancy Hillstrand

Sea ducks Unlimited

Box 7

Seldovia Alaska 99663

Seaducks.org





PACIFIC OCEAN

ALASKA  
(USA)

CANADA

ARCTIC OCEAN

GREENLAND  
(DENMARK)

Svalbard  
(Norway)

RUSSIAN  
FEDERATION

ICELAND

Faroe Islands  
(Denmark)

ATLANTIC OCEAN

NORWAY

FINLAND

SWEDEN

**From:** coal point <fish@alaska.net>  
**Sent:** Monday, September 26, 2011 5:02 AM  
**To:** info@nawmprevision.org  
**Subject:** NAWMP requires a High Latitude Joint Venture

Nancy Hillstrand  
11

9-20-

Sea ducks Unlimited  
P.O. Box 7  
Homer Alaska 99603  
[www.seaducks.org](http://www.seaducks.org)

Re: Responding to Change: The essential need to comprehensively distinguish and Integrate High Latitude Terrestrial and Marine Habitat into Waterfowl Management with a High Latitude Joint Venture.

Greetings,

Alaska and her diverse habitats have been limping along without adequate representation from a consolidated High Latitude Habitat Joint Venture.

- “High latitude areas have exhibited some of the most dramatic contemporary departures from long-term means in climatic parameters since the mid-20<sup>th</sup> century”. (ACIA, 2005; Barber et al., 2009; IPCC, 2007; Beever, E.A., Woodward, A., 2011).
- The Arctic conservation area map (CAFF) **SEE figure A**, gives a more accurate perspective to Mergini Habitat and the habitats needing a stronger representation.
- The melting permafrost and warming temperatures has spawned a “land rush” for developers in the Arctic. Remote habitats are being exploited and require synthesis of extensive research occurring in these areas as pertains to waterfowl.

Most species of Tribe Mergini, the sea ducks extensively utilize high latitude habitats from 55°N up, and coastal marine habitats 25 meters or less. The unambiguous delineation of these critical habitats continues to be obscured and omitted from the NAWMP and waterfowl management.

The burden has been placed on the Sea duck Joint Venture to valiantly produce the silver bullet of population objectives and species research. They are doing a tremendous job. However, with limited budgets man power and the moving target of highly unpredictable and potentially dramatic changes forecasted for high latitudes, this is a daunting task.

Moreover, the SDJV is a species, not habitat Joint Venture. The profound dynamics of the arctic and subarctic terrestrial and marine habitats needs dedicated representation that translates into the NAWMP to aid Tribe Mergini and work in concert with the SDJV and the Flyway Councils. The relationship between harvest and habitat is unattainable without unambiguous representation.

Alaska, the Arctic and sub arctic including coastal marine habitats, is an enormous fundamental conservation unit not adequately accounted for in NAWMP. This area however does have in place *“diverse stakeholders with a collaborative effort of public and private organizations...energized by local passion, and informed by resident expertise and committed to waterfowl conservation”*.

This available talent requires synthesis to portray high arctic habitats for waterfowl. The local passion required and available of high arctic collaborators can give consolidation and connection for reflection in the revised NAWMP. The gaping hole in our NAWMP understanding can be filled with a High Arctic Habitat Joint Venture.

Tribe Mergini have been the lost Tribe. They have been lost inaccurately with Tribe Anatini in the Pot Hole Prairie Region. Mergini must be aligned more prominently with Tribes, that share these exceptional high latitude habitats and reflect their unique requirements.

NAWMP will be unable to assist sustainability of “each species and recognized population” called for in the MBTA without a clear distinction and segregation created between Tribe Mergini and their remote habitats far removed from Anatini and the Pothole Prairie Region (PPR).

Management will remain obsolete and declines of Mergini will continue if Mergini species are not cleanly detached from the misleading biology, physiology, reproductive potential, behaviours and habitats of Tribe Anatini. Accurate up to date sound science must lead management out of the obsolete subjective data presently used for Mergini

Thank-you for your attention Nancy Hillstrand

Nancy Hillstrand  
Seaducks Unlimited Inc.  
P.O. Box 7  
Seldovia Alaska 99663  
[www.seaducks.org](http://www.seaducks.org)

9/22/11

Thank-you for the countless hours devoted to this outstanding evolving process. Please allow my constructive observations for this final comment period to voice my concerns.

My perception comes from harvest management interactions pertaining to Tribe Mergini since 1982:

- State of Alaska Board of Game Management, (primarily)
- the Pacific Flyway Council,
- Co-management Council, and
- Federal SRC.

In Alaska, I have witnessed effective management achieved for species of Anatini, Anserini, and Cygnini. This dangerous bias toward these preferred Tribes however, tends to create a management vacuum, for less understood, less “favored” or “bonus” Tribes.

Predisposed Tribe preference has failed most species of Tribe Mergini.

Conflict of interest and ineffective management has been the norm in Alaska for sea ducks for 30 years. Mergini long term declining trends of 50% to 70% have been supplemented and sanctioned by very liberal and subjective 1920 level bag limits of **18/day 44 in possession for 107 days in Alaska**. Are we waiting to reach the 90-95% like the two Eiders leading to threatened status?

Traditionally, the precautionary principle prescribed immediate conservative harvest bag limits to faltering geese, swans and dabblers in the face of uncertainty.

Not so for sea ducks. Long term depressed status continues with no relief from very liberal bag limits.

Continual delay in management action strategy, waiting for a precise silver bullet from the revenue strapped SDJV does not aid faltering species. It does not alert nor educate the public to the plight of cumulative effects to these birds.

In the face of grave uncertainty, these very liberal obsolete bag limits in Alaska continue to use Prairie mallard biology for marine and arctic “sea” ducks. This inappropriate science and habitat delineation, ignores the parameters of NEPA and MBTA due regard for:

- Species differentiation
- breeding habits i.e. K- selected life strategies,
- acknowledgement of marine habitats,
- acknowledgement of arctic habitats
- distributions
- restricted ranges
- low abundance
- high crippling rates,
- SDJV science and research

- zones of temperature,
- times and lines of migration,
- grossly inaccurate faulty H.I.P. data

Add to, this lack of “due regard”,

- the growth of easily accessible circuits of commercial fishing lodges,
- disturbance by faster effective 30 knot boats
- fleets of deep sea monetary motivated fishing charter businesses, and
- outfitters turned sea duck trophy collectors.

The results of this lack of regard, generates localized bay depletions on birds exhibiting site fidelity, and a skeet shooting mentality that fails to educate the public all without enforcement oversight or accurate harvest records. **This is in direct opposition to the vision of NAWMP**

It promotes crisis management species by species bay by bay.

### **RECOMMENDATION:**

- 1. Commercially motivated, guided “market” sea duck hunting must be regulated in Alaska.** It is waterfowl “for sale”. Bag limits are intended to be attained like a fishing quota. Liberal bags cause relentless disturbance on wintering sea ducks in frigid ice filled waters of Alaska. This does not serve energy budgets or sustainability.
- 2. Differentiate each species in all Federal harvest regs.** Eider, Goldeneye, Scoter fails “each species and recognized population of the MBTA. It is not sustainable and dangerous to less abundant species in restricted ranges.
- 3. Remove special sea duck bag limit in Alaska.** It is the only one in the Pacific Flyway. There is no oversight, no biological justification, no accurate harvest data. It is obsolete and supported by whim.
- 4. Allow 8 ducks per day only four of which can be sea ducks.**
- 5. H.I.P shows zero eiders killed in Alaska.** Please “Google” Eider hunting in Alaska on the Internet.
- 6. Overall population management is faulty.** It misses the crucial localized depletion of resident birds, wintering birds with sight fidelity and disregards due regard for “distribution”.
- 7. Alaska State Board of Game must address Localized Depletions.** Our very effective Game Management Unit system is underutilized to easily minimize localized depletion. Unbiased education of the Alaska Board of Game of Mergini science such as site fidelity, limited distributions, abundance and biology is seriously lacking.
- 8. Limited representation in the Alaska State management process** spawns one sided conflict of interest, service to special guides, inaccurate information and politics. Accurate biologically based information is almost impossible to relay to the creators of regulation: The Board of Game. The State role as MBTA overseer has been diminished
- 9. Separate subsistence for food... from sport trophy fun or profit skin hunting.** This can be accomplished by the state statutes and process
- 10. Understand remote commercial hunting lodges and money motivated guides create hotspots of localized depletion on birds with site fidelity.**
- 11. Remove the word “duck” from the vocabulary.** Use Tribe names or dabbler, bay, sea duck, whistling duck, etc. “Duck” is obsolete and grossly inaccurate.

**Kind Regards, Nancy Hillstrand**

Nancy Hillstrand  
Seaducks Unlimited Inc  
P.O. Box 7  
Seldovia, Alaska 99663  
[www.seaducks.org](http://www.seaducks.org)

**RE: NAWMP MAPPING REVISION**

Greetings,

The present NAWMP WCR Ecoregion level I map used for the WCR's cannot capture the habitats utilized by Mergins and other Waterfowl.

**In Alaska especially these maps need drastic refinement to a level III**

A more detailed WCR Map will say a thousand words and bring awareness of Alaska and the diverse high latitude ecoregions.

The revised NAWMP has the opportunity to educate the audience by introducing an Ecological Region level III maps. To continue to use the 2004 abridged WCR map depiction gives the false impression of simplicity in an environment of complex and dynamic significance to waterfowl presence.

Please accurately portray and continue to revise our higher latitude habitats and the critical areas of continental significance to North American Tribes in the the NAWMP 2004 Implementation Framework Maps:

**REVISE:**

1. Figure B-1 Waterfowl Conservation Regions of North America, Page 54,  
<http://www.nabci.net/International/English/bcrmap.html>,
2. Figure 1. Areas of Continental Significance to North American Ducks Geese and Swans, Page 6,  
and their corresponding relationship of accompanying Tables:
3. Table B-2 Combined Prioritization for Breeding and Nonbreeding Ducks (diving ducks and Sea ducks)
4. Table B-3 Combined Prioritization for Breeding and Nonbreeding Geese and Swans

**PLEASE USE:**

1. **EPA Alaska Ecoregions Map (Omernik et al)**  
**Level III updated Level III Map for All Three Countries of North American**  
[http://www.epa.gov/wed/pages/ecoregions/na\\_eco.htm#Level III](http://www.epa.gov/wed/pages/ecoregions/na_eco.htm#Level III)
2. **WESTERN REGION EPA ECOREGIONS OF ALASKA LEVEL III**  
[http://www.epa.gov/wed/pages/ecoregions/ak\\_eco.htm](http://www.epa.gov/wed/pages/ecoregions/ak_eco.htm)
3. **CEC NORTH AMERICAN ENVIRONMENTAL ATLAS. MAPPING NORTH AMERICAS SHARED ENVIRONMENT)**  
<http://www.cec.org/atlas/>
4. **USGS MARINE ECOREGIONS LAYER**  
[http://alaska.usgs.gov/science/biology/nppsd/marine\\_ecoregions.php](http://alaska.usgs.gov/science/biology/nppsd/marine_ecoregions.php)
5. **Shorezone Habitat Mapping**  
[www.noaa@shorezone.gov](http://www.noaa.gov/shorezone)

Thank-you for your consideration

Sincerely,  
Nancy Hillstrand



Nancy Hillstrand  
Sea ducks Unlimited Inc.  
P.O. Box 7  
Homer Alaska 99603  
[www.seaducks.org](http://www.seaducks.org)

August 28, 2011

Re: NAWMP must commit to recognizing marine habitats.

The NAWMP needs more precision in expanding portrayal of habitats. It needs to lead the charge for sustainability of declining birds, and see the patterns of decline within Tribes and their habitats.

**A standardized, refined, and up to date North American marine ecoregion mapping system is needed** if we want to “*commit to the foundations of waterfowl conservation*”.

This map must accurately represent reveal, and communicate critical waterfowl interactions and requirements of benthic nutritional regimes of our non breeding marine waterfowl. Coastal 25 meters or less benthic marine ecosystems used extensively by Mergini and other Tribes of waterfowl cannot be translated from Pelagic habitats. It is misleading and continues to contributing to the obscurity of near shore habitats.

**The reference using Kushlan 2002 Pelagic Conservation Regions is meaningless and overlooked.** This lack of detail delays understanding of our marine salt-waterfowl and obscures the significance of their dynamic restricted habitats and latitudinal zones of temperature mandated by the MBTA.

If we are to accomplish a “*fresh synthesis of the core elements*” for waterfowl, then non breeding Tribes of Anatidae, in particular the lost Tribe Mergini that live under the bridge between terrestrial and Pelagic habitats must have their wintering and non breeding life stage habitats incorporated in the NAWMP.

**A recognition of the importance of near shore benthic habitats clearly depicted in a visual mapped form is needed in the present revision.**

- Alan M. Springer and John F. Piatt of the USGS Alaska Science Center have a more comprehensive map that would be beneficial to NAWMP vision. Please see:
- **Marine Ecoregions of Alaska** as shown on p. 525 of Long Term Ecological Change North Gulf of Alaska [http://alaska.usgs.gov/science/biology/seabirds\\_foragefish/products/publications/Piatt\\_Springer\\_2007\\_Marine\\_Ecoregions\\_Alaska\\_Spies\\_Elsevier.pdf](http://alaska.usgs.gov/science/biology/seabirds_foragefish/products/publications/Piatt_Springer_2007_Marine_Ecoregions_Alaska_Spies_Elsevier.pdf)

In addition, NOAA has created a tremendously powerful tool that can achieve a needed depiction of benthic and estuarine habitats. It is a GIS system called Shore-zone habitat mapping. The coastline from Washington State up through British Columbia Southeast and South Central Alaska coastlines have been mapped. Thousands of hours of flight time and digital photography have been flown to reveal units of “bio-bands or zones that can be queried for 182 data sets pertaining to habitat. We can begin overlaying all surveys of known distribution. It is free to use.

The most recent update was now. September 2011. This tool is a basis used for oil spill contingency planning and oil persistence. Mergini are at grave risk from oil spills and NAWMP can aid in prevention and understanding of these habitats and their role for waterfowl interaction

Alaska ShoreZone Coastal Mapping and Imagery  
<http://alaskafisheries.noaa.gov/habitat/shorezone/szintro.htm>

The Washington State ShoreZone Inventory User’s Manual:  
[http://dnr.wa.gov/Publications/aqr\\_nrsh\\_szusermanual.pdf](http://dnr.wa.gov/Publications/aqr_nrsh_szusermanual.pdf)

How to use the NOAA’s shore zone mapping  
<http://www.coastalandoceans.com/shorezone.html>

**Thank-you for your time. Sincerely, Nancy Hillstrand**



# STATE OF IOWA

TERRY E. BRANSTAD, GOVERNOR  
KIM REYNOLDS, LT. GOVERNOR

DEPARTMENT OF NATURAL RESOURCES  
ROGER L. LANDE, DIRECTOR

**To:** NAWMP Revision Steering Committee

**From:** Guy Zenner, Waterfowl Research Biologist, Iowa Dept. of Natural Resources

**Date:** September 26, 2011

**Subject:** NAWMP Revision Comments and Suggestions

On behalf of the Iowa Department of Natural Resources, I would like to thank the Plan Revision Steering Committee for giving us this opportunity to comment on this draft of the revision of the North American Waterfowl Management Plan (NAWMP or Plan). We appreciate the time, effort, and thought that has gone into developing this draft, particularly the attention given to the input previously provided from the workshops and the Waterfowl Summit. However, we have some major concerns about this latest version of the Plan.

First, this draft of the Plan is not so much a "revised Plan" as it is a strategy to revise the Plan. The 1986 NAWMP contained goals for duck, goose, and swan populations, as well as goals for their use, and habitat goals to sustain these populations. We may question the validity of some of those goals at this point in time, but they nevertheless provided conservation agencies and non-government organizations (NGOs) with clear (and measurable) targets that they could all jointly strive to achieve. This helped motivate people from inside and outside the traditional waterfowl management community, particularly legislators and NGOs, to push for greater efforts and funding to conserve wetland habitats and waterfowl populations. In that respect, the Plan was a great success. In this revision of the Plan, the primary "goal" appears to be to "develop a new process" to manage waterfowl in North America. Developing a new process for waterfowl management is not going to "galvanize the community of conservationists on this continent to protect and enhance habitats essential to waterfowl." In our opinion, this revision of the Plan is not "a clear vision for the future of waterfowl management." Rather, it is a somewhat foggy vision for changing the process we use to manage waterfowl populations. We believe a more accurate title for this document would be "A Strategy for Revising the NAWMP." The third paragraph of the Introduction states that the "intent is to define the challenges...and identify the actions that must be pursued over the next 2-5 years." A fully revised Plan should have a much longer time frame, such as 25 years. This document should be considered an interim strategy for revising the NAWMP with the goal of developing the processes for integrating waterfowl population management, habitat management, and human dimensions in a new Plan that will be drafted in the near future, say 2017. Once the new processes are in place for integration, the Plan Committee can then revise the population and habitat goals and objectives that were outlined in the original 1986 Plan. Hopefully those revised goals and objectives will "galvanize the community of conservationists ...to protect and enhance habitats essential to waterfowl."

Second, in the Introduction it states that this Plan "was written primarily for the benefit of people who interact most closely with the waterfowl resource; waterfowl hunters, other conservationists and citizens whose passion is waterfowl and wetlands." And yet, this document is replete with waterfowl management jargon that even a recent Flyway representative would find difficult to

digest. We strongly urge the Plan Committee to avoid using the jargon that is commonly used by Flyway representatives or other waterfowl working groups and to use the more easily understood and straight-forward language that was used in the 1986 Plan. We recommend the next version of this document be reviewed by several persons that are familiar with conservation issues but are not intimately familiar with the jargon used in waterfowl management circles. This is critical if this document is really written for “waterfowl hunters or other conservationists and citizens whose passion is waterfowl and wetlands.” It is also important if we want this document to be understood by the next generation of conservationists who will be managing these resources in 15, 20, or 25 years. We need to more clearly and plainly say what we mean.

We agree with the goals, in general. It may be useful for people outside the traditional waterfowl management community, particularly non-hunters, to see a short rationale for each of these goals. The rationale should concisely tell the average citizen why conservation agencies and NGOs are striving to achieve each of these goals and how the citizens of North America will benefit from achieving these goals. It is unclear what - “without imperiling habitat” - means in Goal 1. This phrase could be interpreted to mean several things and it does not add much to the goal. We suggest revising Goal 3 as follows: “Increase the number of citizens who appreciate and actively support waterfowl and wetlands conservation and traditional uses.” Some of those citizens will be hunters, but that does not have to be explicitly stated in the goal. We all recognize that waterfowl hunting regulations only marginally influence hunter participation and that societal values and available free time have greater influences on participation. Thus, we may not be able to increase hunter numbers in light of these factors. We may have to be satisfied with just increasing the number of citizens that support wetland and waterfowl conservation, which hopefully will be adequate to sustain efforts to conserve wetland habitats and waterfowl populations in the future.

We like the review of the history of the 1986 Plan and its accomplishments, as written on pages 10-12. We think this is necessary and useful for younger readers to fully understand how and why the original Plan was developed. Again, however, we caution against using jargon. For example, the Joint Task Group is mentioned, but the JTG and its function is not defined. We believe the information at the bottom of page 20 and top of page 21 should also be moved into this section to describe the current state of waterfowl conservation in North America. This should help the reader better understand the sections that follow.

The section on “Waterfowl, Wetlands, and People” (pages 12-21) should be shortened substantially so the reader more quickly gets to the bullet points on page 19. The section on “Institutional Support and Leadership for Integrated Waterfowl Management” would be better placed in the appendices, which is where it was in the original 1986 Plan. However, if this document is no longer going to a revision of the “Plan” but rather a strategy for integration that will lead to a revised Plan, then it should stay in the body of the document. In either case, it should be shortened and some of the ambiguous language removed (e.g., “the waterfowl management community should consider arrangements that may facilitate a more integrated approach.”). The language used in this plan or strategy should be less indecisive. It should provide clear strong guidance that will lead to action. Thus, the above example should be revised to read “the waterfowl management community should develop a more integrated approach.” The later statement more clearly tells readers what the Plan Committee believes we need to do.

If the two sections we mentioned above were shortened, the reader would not have to plow through 15 pages to get to the actual recommendations in the document, which are the meat of the document. The “Next Steps” outlines processes for developing a more integrated approach

to waterfowl management in North America, it does not describe the strategies necessary for achieving Goals 1, 2, and 3 of the Plan. Consequently, this document is simply a "vision for integrated waterfowl management;" it is not a true revision of the Plan as stated in the conclusions. After the integration process has been developed, or at least initiated, the strategies for achieving the goals stated on page 8 can be drafted in the context of the new integrated process. At that point, we can then revise the Plan, including revising its numeric waterfowl population and wetland habitat objectives, and establish specific objectives and strategies for increasing citizen support for wetlands and waterfowl conservation. We believe a Plan with those clearly-stated targets and strategies will motivate conservation-minded citizens to carry on the work of wetland and waterfowl conservation for the next 25 years.

Finally, when the Plan is revised, the waterfowl population abundance objectives in Appendix B should be incorporated into the body of the Plan. After all, it is a waterfowl population management plan, not a waterfowl management process plan. We would also like to see specific habitat objectives for each of the joint ventures outlined in the revised Plan along with some prediction of how achieving those habitat objectives in the next 25 years will help to sustain waterfowl populations and recreational opportunities for waterfowl enthusiasts and contribute to ecological services for society at large.

Again, we thank the Plan Revision Steering Committee for their hard work on this important document and look forward to the next draft.

Sincerely,

A handwritten signature in dark ink, appearing to read "Guy Zenner". The signature is fluid and cursive, with the first name "Guy" and last name "Zenner" clearly distinguishable.

Guy Zenner  
Waterfowl Research Biologist  
Iowa Dept. of Natural Resources  
1203 N. Shore Drive  
Clear Lake, IA 50428  
phone: 641-357-3517  
e-mail: [guy.zenner@dnr.iowa.gov](mailto:guy.zenner@dnr.iowa.gov)

September 26, 2011

To: NAWMP Revision Steering Committee

From: Sea Duck Joint Venture Continental Technical Team (SDJV-CTT)

**Subject: Sea Duck JV Continental Technical Team Comments on the NAWMP 2012 Draft Document**

The SDJV-CTT would like to thank the Revision Steering Committee for their hard work and progressive thinking on the revised Plan. We recognize that incorporating the needs and opinions of numerous partners and stakeholders into one vision is a huge challenge.

The SDJV-CTT provides some comments for your consideration.

1. The SDJV-CTT supports the concept of an integrated waterfowl management system. However, an integrated system requires precise data, something we do not have yet for sea ducks. Reliable population indices, estimates of annual productivity, and harvest rates are lacking for some sea ducks. Ongoing resources to obtain this information are required and it likely will be many years before an integrated system is in place for sea ducks. The development of an integrated system should not be done at the expense of our ongoing efforts to address the significant science gaps for sea ducks.
2. The Executive Summary and the Introduction mention that the 2011 breeding population of ducks in the traditional survey area is among the largest ever (page 2 and 7). However, it should be noted that not all waterfowl populations are at adequate levels and some populations of sea ducks continue to decline.
3. The Plan mostly covers waterfowl populations of the "Traditional Survey Area" and how we have dealt with populations and landscapes in that area. However, the traditional survey area does not encompass the breeding areas for many species of sea ducks. The Plan should outline that for species that use other areas (such as sea ducks), our knowledge of populations is much less and the potential impacts of non-traditional uses, interests, and economics will likely create much different challenges in the years ahead.
4. In Appendix B, re: population objectives. The use of population trend should also be considered in the currency of population objectives.
5. The SDJV currently recognizes several populations of sea ducks at a finer scale than that noted in the plan (e.g., allopatric populations of Pacific and Atlantic Black Scoter). We recommend that for consistency, these distinct populations be recognized in the plan as well.
6. Throughout the Plan, it refers to the decline in waterfowl hunters and implies that part of waterfowl management should be to reverse this trend. An increase in waterfowl hunters would increase the amount of funding available for overall waterfowl conservation, and presumably this includes funding directed at sea duck

conservation. However, the Plan does not discuss whether reversing the trend in declining hunters also applies to hunters that harvest waterfowl species that are from low and/or declining populations (e.g., some sea ducks). There should be an acknowledgement in the Plan that for some declining populations, increasing the number of hunters may not be an appropriate management tool.

7. The Plan should emphasize engaging all conservationists and citizens who enjoy and use waterfowl, not just waterfowl hunters. More consideration is needed as to how non-hunting conservationists and citizens may be able to support waterfowl conservation. One of the biggest challenges for the future will be to ensure adequate funding to support existing waterfowl conservation as well as to implement the new 2012 Plan.
8. The Plan mostly focuses on the human dimension of waterfowl management, especially the issue of declining waterfowl hunters. In the case of sea ducks, there are many issues that are influencing population numbers and causing impacts to their habitat. These include urbanization and industrialization of traditional wintering areas, loss or degradation of breeding and wintering habitats, increases in predator populations, and bioaccumulation of chemical contaminants. The Plan needs to ensure that issues related to population and habitat, not just the human dimension, are given equal weight in the Plan to perpetuate the theme of “Strengthening the Biological Foundation” as highlighted in the 2004 NAWMP.
9. Climate change is only mentioned once in the document (page 15). Given that climate change may have long-term impacts on sea ducks and other waterfowl populations, further discussion of this issue is warranted, particularly for arctic regions that are expected to be disproportionately affected by climate change. Similarly, marine areas used by sea ducks and other waterfowl will undoubtedly be affected by climate change. Accordingly, greater acknowledgement should be given to the importance of habitat conservation in marine areas.
10. Although the importance of sound science is mentioned in the NAWMP purpose (page 8) and as a guiding principle (page 10, No. 9), the rest of the Plan does not emphasize sound science. In contrast, the 2004 Strategic Guidance of the NAWMP had a full section on the importance of sound science (V. Increasing Our Scientific Base, pages 16-17). In order for an integrated waterfowl management system to work effectively, sound science and knowledge is required. The 2012 Plan should have more emphasis on the importance of sound science and knowledge

The SDJV-CTT appreciates the opportunity for review and comment on the draft Plan.

Sincerely,

Dr. Sean Boyd, Co-chair (Canada), Sea Duck Joint Venture Continental Technical Team

Dr. Matthew C. Perry , Co-chair (U.S.), Sea Duck Joint Venture Continental Technical Team

September 26, 2011

To: NAWMP Revision Steering Committee

From: Chris Dwyer, Migratory Game Bird Biologist, USFWS Northeast Region,  
and Bill Thompson, Inventory and Monitoring Coordinator, USFWS  
Northeast Region

**Subject: Comments on the NAWMP 2012 Draft Document**

We would like to thank the Revision Steering Committee for their leadership and dedication toward developing a vision for integrated waterfowl management. We recognize there will be many important challenges facing the waterfowl management community during the next 25 years, and feel that we are at critical point in our need to expand our conservation efforts, reverse the decline in hunter numbers, and reach out to other members of society to increase support for waterfowl conservation.

We offer the following comments/suggestions on the topics for which you are primarily interested in obtaining feedback:

1. The greatest challenges facing waterfowl management in the next decade.

Funding, allocation of limited resources (time, staff, dollars) and our collective capacity to successfully integrate the goals to the degree in which they are able to inform decision-making and ensure success.

2. The appropriateness and relative importance of the three goals.

Each is important and necessary to ensure that the NAWMP remains one of the most successful conservation initiatives, becomes more relevant to society and builds upon the foundation for which it was established.

3. The most important, measurable objectives that would serve to accomplish the stated goals, and how to develop these.

- Abundant and resilient waterfowl populations to support hunting and other uses – Appendix B does an adequate job of addressing this, and it is encouraging to see the Plan Committee consider using alternatives to population size objectives such as vital rates, particularly for species not adequately surveyed outside of the Traditional Survey Area (i.e. sea ducks). For certain species, the use of vital rates developed through life cycle modeling using sound science and supported by cost-effective monitoring may help inform managers at local/regional scales on the appropriate action(s) to implement.
- Wetlands and related habitats sufficient to sustain waterfowl populations – Work currently being done by the habitat JV's to step down population objectives and establish habitat goals is reasonable, but must be measurable and linked back to continental objectives. For managed areas, a greater effort is needed to ensure that limited conservation dollars are being spent at the right locations and on the most effective management treatment to support population objectives. An approach being taken by the Integrated Waterbird Monitoring and Management Program in the Atlantic and Mississippi Flyways may serve as a model for



optimally managing conservation lands to support continental waterbird populations (<http://iwmmprogram.ning.com/>), and is worth taking a closer look at the model development and survey protocols that are being used.

- Growing numbers of waterfowl hunters, other conservationists and citizens who enjoy and actively support waterfowl and wetlands conservation - We currently have a reasonable measure of the number of waterfowl hunters in the U.S. and Canada, although additional measures may be important to consider as we seek to engage a wider segment of society for the purpose of supporting conservation:
  - A recent survey (Birding in the United States: A Demographic and Economic Analysis [http://library.fws.gov/Pubs/birding\\_natsurvey06.pdf](http://library.fws.gov/Pubs/birding_natsurvey06.pdf)) indicates that there were 48 million birdwatchers in the U.S. during 2006 that spent approximately \$12 billion on trip expenditures and \$24 billion on equipment expenditures. Based on the same report, 77% of these birdwatchers observed waterfowl, making them the most watched bird group in the U.S.
  - In contrast, the 1.3 million U.S. waterfowl hunters spent an estimated \$494 million on trip expenditures and \$406 million on equipment expenditures in 2006 (Economic Impact of Waterfowl Hunting in the U.S.: An Addendum to the 2006 National Survey of Fishing, Hunting and Wildlife-Associated Recreation [http://library.fws.gov/pubs/nat\\_survey2006\\_waterfowlhunting.pdf](http://library.fws.gov/pubs/nat_survey2006_waterfowlhunting.pdf)).
- What is noteworthy from the Birding in the United States report, is that very little, if any of the \$36 billion in birdwatching expenditures during 2006 was used to help fund conservation, which is an aspect of alternative funding that could be developed as a dedicated source of revenue similar to Pittman-Robertson/Dingell-Johnson funding. This should be given a much higher consideration than simply “whether alternative funding arrangements may be desirable” as indicated in the second bullet on Page 21. This must happen for the Plan revision to be successful in the years ahead.
- To put this in perspective, Page 11, 4<sup>th</sup> Paragraph indicates that Plan partners spent more than 4 billion dollars (USD) over the past 25 years in protecting and restoring wetlands and associated habitats.
- The timescale of incorporating these objectives will be different based on the sources of information (annual, vs. 5-year), and the decisions to be informed. Certainly, it will be difficult to assign each of the 3 goals equal weight, but the technical aspects of integration are yet to be developed. Partial integration, by default, may occur at much shorter time intervals and frequencies than full integration, if that’s even be possible.
- The economic reports do provide reasonable baselines at the state level in which to establish goals for increasing participation and measuring success. A starting point may be to focus on the habitat/harvest linkages, and model the HD aspects as a product of the two. HD measures could be waterfowl hunter numbers, number of birdwatchers who observe waterfowl, economic revenues generated, and funding to support wetland and waterfowl conservation in North America through a new dedicated funding source. Duck stamp revenues will not be adequate enough to support waterfowl conservation in the future, nor will license sales or taxes on sporting equipment/ammunition. It is time to think big and step up to the wider constituency plate to obtain the funding necessary to support this work. Otherwise, we risk thinning already declining budgets.

#### 4. The nature of useful objectives related to recruiting and retaining waterfowl hunters.

It is important to understand factors that contribute to the recruitment and retention of waterfowl hunters, what level they might be directly related to, or a result of waterfowl populations or habitats, whether the conservation community has any direct control or influence over factors that limit (or increase) recruitment or retention, and the timescale in which to measure changes/results.

5. The means to engage a broader constituency (i.e. beyond hunters) in the cause of waterfowl conservation.

It appears that a broader constituency is already engaged in the use/appreciation of waterfowl based on the document mentioned above (Birding in the U.S.: A Demographic and Economic Analysis) which indicates that 77% of the 48 million birdwatchers in the U.S. reported observing waterfowl in 2006, making them the most watched group of birds. Whether intentional or unintentional, this has certainly been a direct result of the success of NAWMP partners and initiatives over the last 25 years. While considerations are being made to engage a broader constituency, there should be clear objectives in doing so, and include the need to develop stronger economic support for waterfowl and wetland conservation through an additional funding mechanism. The User-Pays, User-Benefits approach of the North American Model of Wildlife Conservation should be incorporated into the “business” portion of the Plan revision.

6. The concept of integrated waterfowl management and the greatest challenges/benefits likely associated with integration.

There are certainly benefits of integrating and developing stronger linkages between habitats, waterfowl populations and users/supporters of conservation, although the community must be prepared to recognize how and where to spend our limited resources to do this effectively. It seems plausible to set objectives for each, and determine the relationships between them in order to develop models. The key will be to identify what decisions can and should be influenced by the various sources of information, and the reasons why.

7. Strategies that would make waterfowl management more efficient, effective and responsive.

Strong leadership, effective communication/listening skills, and adequate resources to ensure the waterfowl community has the capacity to develop, implement and monitor the outcome(s) of this new approach.

8. The necessity of changing or adapting our current institutions in order to implement the new NAWMP and the nature of the changes that may be warranted.

This bold Vision for the next (presumably?) 25 years will also require a bold business plan, one that can provide greater accountability for the funding resources needed to implement the Plan revision and measure returns on investment. Consider that sound science is a major component of this Plan, and we continue to lack important information and the resources needed to obtain it on species such as sea ducks.

9. The sufficiency of proposed recommendations and action steps to move this plan forward.

The last sentence regarding the need to “Confront the Changing Social Landscape” (pg 26) should be highlighted, and stated up front in the document. This sentence captures much of the concerns raised above about funding this new work.

Thank you for the opportunity to provide comments on the current draft, and we look forward to reviewing the next version.



GARY R. HERBERT  
Governor

GREGORY S. BELL  
Lieutenant Governor

# State of Utah

## DEPARTMENT OF NATURAL RESOURCES

MICHAEL R. STYLER  
*Executive Director*

### Division of Wildlife Resources

JAMES F. KARPOWITZ  
*Division Director*

September 26, 2011

USFWS Division of Bird Habitat Conservation  
4401 North Fairfax Drive MS4075  
Arlington, VA 22203

Attn: NAWMP Revision Comments

Dear NAWMP Representative,

The Utah Division of Wildlife Resources (UDWR) appreciates the opportunity to comment on the North American Waterfowl Management Plan (NAWMP) 2012 Revision. This revision takes a bold step to produce three goals to help focus future waterfowl management efforts. In addition, the plan vision attempts to integrate the goals into one unified approach by identifying the need for quantifiable objectives, development of interlinked models and monitoring systems while recognizing the cultural changes. We support this approach.

As you are aware, UDWR has a representative on the Pacific Flyway Council. In addition, our Assistant Director Alan Clark is the chair of the Intermountain West Joint Venture Management Board. Both of these groups are drafting comments on the NAWMP revision. Utah supports the comments generated by these committees realizing there is some uncertainty as to how and at what level the three goals will be integrated into decision making.

In general, UDWR recognizes the challenges to integrate population management, habitat management and human dimensions, as the three have operated for the most part independently at the National level. We agree that the future of waterfowl management in North America will require at some level integration of all three goals.

We applaud the plan revision and challenge set forth to develop a more fully integrated North American waterfowl management system.

Sincerely,

James F. Karpowitz  
Director



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# PACIFIC FLYWAY COUNCIL

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Alaska • Arizona • California • Colorado • Idaho • Montana  
Nevada • Oregon • Utah • Washington • Wyoming



P.O. Box 200701  
Helena, MT 59620-0701

September 26, 2011

USFWS Division of Bird Habitat Conservation  
Attn: NAWMP Revision Comments  
4401 North Fairfax Drive MS4075  
Arlington, VA 22203

## Plan Committee:

Thank you for the opportunity to comment on the North American Waterfowl Management Plan 2012 Revision (Plan Revision). The Pacific Flyway Council recognizes the considerable time and energy that has gone into developing this document. The Plan Revision does an excellent job laying out historical challenges faced by the waterfowl conservation community. Furthermore, the purpose and goals effectively reflect what has been stated and learned throughout the extensive structured decision process conducted by the Plan Committee. The amount of time and effort put into those workshops is deeply appreciated. Our comments are intended to provide a constructive approach to supporting these goals, while engaging, as much as possible, current waterfowl community infrastructures.

Integrating harvest management and habitat conservation using common population objectives is a necessary and achievable goal. We agree that there is an immediate need for establishing and using common population objectives among habitat and population managers. Because these objectives are fundamental to harvest management, such a process should directly involve flyway councils, rather than relying on representatives from a variety of working groups to establish them (*Page 23, Immediate Interim Adjustments*). Whereas these working groups generally have technical representation from the flyways, any final decisions or products from these groups need to be vetted through the Flyway Councils. The Plan Revision recommends developing an Integration Technical Team to identify appropriate metrics, establish population and habitat objectives, and integrate the objectives, among other tasks. We are not sure establishment of this additional level of organization is necessary to integrate human dimensions, population and habitat management.

The Joint Task Group laid out a conceptual model for integrating harvest and habitat objectives based on establishing reasonable population objectives and managing for a shoulder point on a yield curve. Although this approach has largely been embraced by the flyways, it was not explicitly mentioned in the Plan Revision. The document did however mention linked models and integration without specific reference to the current yield curve approach. This should be clarified to ensure that the current approach is recognized as one of the fundamental tools for integrating harvest and habitat objectives.

The Plan Revision implies there will be further integration of Human Dimensions (HD) data relative to harvest and habitat models. We agree with the assertion on page 14 that the decline in waterfowl hunter numbers has continued independent of hunting regulations. Many Pacific Flyway states have noted similar trends in big and small game hunters as well, and have begun using a variety of methods to recruit and retain hunters. It is important to use HD data in a manner that will help decision makers better understand the preferences and needs of hunters with regard to hunting regulations and accessibility to hunting. From a harvest standpoint, the Pacific Flyway Council anticipates periodic surveys to help ensure harvest packages and regulations are structured to help support hunter retention and recruitment needs. The Council does not expect HD to be part of an annual optimization effort that would inform selection of a harvest package.

On pages 3 and 19, the Plan Revision scales up referencing, “focus area, Joint Ventures, and continental scales.” We recommend including flyway scales as intermediate to Joint Venture and continental. In practice, the flyway scale is an effective scale for planning, determining habitat shortcomings, and allocating resources.

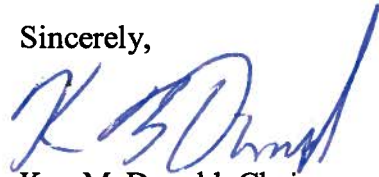
Under the heading, Next Steps, the Plan Revision identifies a number of places where the National Flyway Council (NFC) should be engaged. We recommend that the Flyway Councils be involved in addition to the NFC. The Plan Committee should hear perspectives from all flyway councils in addition to consensus recommendations from the NFC.

In the introduction section (page 7, For Whom is the plan written?) the boxed section states that the plan is written primarily “for the benefit of people who interact most closely with the waterfowl resource: waterfowl hunters, other conservationists and citizens whose passion is waterfowl and wetlands”. As written, it clearly addresses the needs of waterfowl managers and technical folks, but does not offer much to the rest of its stated audience. Past revisions of the North American Waterfowl Management Plan served as a clear vision for waterfowl habitat management that was accessible to everyone interested in waterfowl habitat conservation. The plan should enable habitat decisions made on the State and Federal level, guide Joint Ventures to priority areas for habitat restoration, assist Non-Governmental Organizations to focus their habitat improvement activities, and help to explain the need for active waterfowl habitat management activities to policy makers. As written, however, the vagaries of integration and coherence, the emphasis on models, and the focus on management challenges may confuse rather than enlighten some of the traditional constituents for this Plan Revision. It is important that the revision include the partners who have brought waterfowl management to the place we are today. The Revision should make every attempt to not only provide a vision for the future, but to also

recognize and celebrate past substantial accomplishments in the absence of a fully integrated approach to habitat and population management.

Thank you for considering our comments.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Ken McDonald', with a long, sweeping flourish extending upwards and to the right.

Ken McDonald, Chair  
Pacific Flyway Council





# MISSOURI DEPARTMENT OF CONSERVATION

## *Headquarters*

2901 West Truman Boulevard, P.O. Box 180, Jefferson City, Missouri 65102-0180

Telephone: (573) 751-4115 ▲ [www.MissouriConservation.org](http://www.MissouriConservation.org)

ROBERT L. ZIEHMER, Director

September 26, 2011

U.S. Fish and Wildlife Service – Division of Bird Habitat Conservation

Attn: Draft NAWMP Revision

4401 North Fairfax Dr. MS40756

Arlington, VA 22203

Dear NAWMP Revision Steering Committee:

The Missouri Department of Conservation (MDC) would like to thank the North American Waterfowl Management Plan Committee (PC) and the NAWMP Revision Steering Committee (RSC) for initiating a revision of the North American Waterfowl Management Plan. We especially appreciate the opportunities afforded us to provide input through workshops, flyway and joint venture meetings, and finally through the review of this draft document. This letter is the outcome of reviews by six MDC staff members, including our Wildlife Division Chief, our Resource Science Chief, a Wildlife Management Chief, a Wildlife Regional Supervisor, a Resource Science Supervisor, and Resource Scientist.

The three goals of waterfowl management in the NAWMP Revision represent a fundamental change from the original North American Waterfowl Management Plan. Our agency supports this new direction. We believe it is essential that management plans and actions address population, habitat, and public use considerations. We are hopeful that the NAWMP Revision will better position the waterfowl management community to assess tradeoffs between objectives at state/provincial, regional, and continental scales and lead to management actions that help us reach habitat and public use objectives along with waterfowl population objectives. We recognize this will require substantial changes in how we do business.

We continue to support the inclusion of human dimension considerations into waterfowl management. We supported the National Duck Hunter Survey, efforts by the Strategy Team to develop a “sustained and long-term conversation with duck hunters,” and the initial steps taken by the flyways to form a Human Dimensions Working Group (HDWG). The NAWMP Revision needs to make a stronger case for forming such a group. For example, on page 23, the reader is left with the impression that an HDWG is already in the process of being formed. This language is too complacent. While the Flyways have taken initial steps to form a HDWG, the NAWMP Revision should provide the directive to establish such a group.

The NAWMP Revision also takes an important step forward in acknowledging the importance of hunting and other public use values associated with waterfowl and waterfowl habitat. To this end, we agree that the NAWMP Revision should provide the framework to develop hunter recruitment and retention strategies, but equally important, provide a vision of how to engage viewers, conservationists, and the public. As currently written, the NAWMP Revision appears to place more emphasis on hunting and could potentially marginalize others who have a stake in waterfowl and wetland management.

COMMISSION

DON C. BEDELL  
Sikeston

JAMES T. BLAIR, IV  
St. Louis

DON R. JOHNSON  
Festus

BECKY L. PLATTNER  
Grand Pass



We look forward to working with partners to 1) establish a Human Dimensions Working Group, 2) develop hunting, viewing, and conservation participation objectives, 3) implement management actions to achieve hunter, viewer, and conservation participation objectives, and 4) design appropriate monitoring programs.

We also support the general structured decision making framework being proposed in the NAWMP Revision. As an agency, we are also attempting to use a structured decision making approach to more closely link models of understanding, objectives, decisions/actions, and monitoring in wetland/waterfowl management. Through this experience, we recognize the challenges of implementing this type of framework, but share in the belief that it leads to greater transparency, more targeted management actions, enhanced opportunities for learning, and improved management.

The NAWMP Revision places considerable emphasis on integration and coherence; however, it is less clear what is meant by an integrated or coherent management system, nor is it clear how these changes will lead to more efficient and effective management. Will this be explained in the Action Plan? Would it be possible to include some examples of how our current system is not integrated and coherent? How will increased integration make management more efficient and effective? As written, it is difficult to assess how a more integrated system will benefit waterfowl management.

The NAWMP Revision encourages the formation of an Integration Technical Team (ITT) to provide the technical expertise. We recognize that the NAWMP Revision is proposing this to be a temporary group, but we encourage the RSC to consider alternative methods of reorganizing or combining existing groups. If we simply add groups and do not consider restructuring, it could lead to an additional layer of bureaucracy and more inefficiency.

Since many habitat management decisions, public use decisions, and regulatory decisions are implemented at the state/provincial and local levels, it will be essential for the ITT to include state/provincial perspectives. At present, the NSST and HMWG have disproportionate representation from the U.S. Fish and Wildlife Service compared to state agencies. We encourage the RSC to seek input from the flyways and states on how to utilize the expertise and experience of state and provincial agencies in this process. At the federal level, it will also be important to consider how Canada and Mexico may be included on this ITT.

We offer some editorial comments. Individuals who reviewed the document commented that the NAWMP Revision did more selling than telling and was too dramatic. They noted that while resource professionals may view it as a sales job, it would likely still be too complex for the general public. They suggested giving more consideration to the intended audience and writing the document accordingly. In a similar fashion, they suggested that depicting all that is broken with the system at a time of record waterfowl numbers may come across as disingenuous and encouraged the RSC to acknowledge this fact to help establish credibility.

Some MDC reviewers also commented that the organization was difficult to follow. They did not feel the need for change was clearly linked to the proposed vision. They offered two cautions. First, they cautioned to either include multiple conservation organizations or no conservation organizations rather than mentioning only Ducks Unlimited. Second, they warned that touting the successes of the waterfowl management community may come across as arrogant and alienate potential partners. They cited the last sentence in the first full paragraph on page 17 as an example.

The sentence that begins on bottom of page 13 and ends on the top of page 14 states, “Alternative hypotheses for hunter decline included increased regulatory complexity and reduced public access to hunting areas.” We are concerned that some readers may take this sentence to imply that regulating access to public hunting areas is contributing to the decline in hunter numbers. In Missouri, we limit the number of hunters on some wetland areas to provide opportunity for quality hunts. We believe providing quality hunting opportunity is one of the reasons Missouri’s waterfowl hunter numbers are stable or even increasing. We suggest changing the sentence to read, “Alternative hypotheses for hunter decline included increased regulatory complexity and fewer places for people to hunt.” This alternative would still make the point of fewer places to hunt without indicting state programs that are intended to increase hunter participation.

MDC reviewers also encouraged additional editorial review. Specifically, they recommended using more consistent adjectives to describe the desired state for waterfowl populations. For example, on page 8, Goal 1 mentions “abundant and resilient” waterfowl populations, the paragraph following refers to “healthy” waterfowl populations, and on page 9, the third bullet of the vision cites “sufficient” waterfowl. They also recommended a more consistent use of terms to describe the original NAWMP, NAWMP updates, and the NAWMP Revision. At times, it is difficult to follow what is being referred to by “Plan,” “Revision,” “Original Plan,” and “1986 Plan.” For example, the seventh guiding principle on page 10 refers to “Plan” objectives. We suspect that in this case word “Plan” is actually referring to “Revision” objectives. Consistent language throughout would be helpful.

Without seeing the Action Plan, it was unclear if the last section of the NAWMP Revision would be more appropriate in that location. Furthermore, there are many references to specific actions that could be moved to the forthcoming Action Plan. The questions beginning on page 20 are confusing. Are these questions that the technical groups are already addressing, will they be addressed by the Action Plan, or are they rhetorical questions? They may detract from the vision the NAWMP Revision is meant to provide.

In conclusion, we support the revision of the North American Waterfowl Management Plan. Building the NAWMP Revision on the fundamental objectives expressed by stakeholders at workshops, flyway meetings, and joint venture meetings will provide a solid foundation to develop management actions that will lead to abundant and resilient duck populations, adequate habitat, and an engaged public. We look forward to the opportunity to also review the forthcoming Action Plan. We are hopeful the Action Plan will provide more details on how we can achieve the objectives laid out in the NAWMP Revision. More importantly, we look forward to continuing to work as a fully engaged partner in waterfowl management. We thank the Planning Committee and the Revision Steering Committee for initiating this effort.

Sincerely,

A handwritten signature in black ink, reading "Tom A. Draper". The signature is fluid and cursive, with a large loop at the end of the last name.

TOM A. DRAPER  
DEPUTY DIRECTOR





## Nebraska Game and Parks Commission

2200 N. 33rd St. • P.O. Box 30370 • Lincoln, NE 68503-0370 • Phone: 402-471-0641 • Fax: 402-471-5528

September 26, 2011

NAWMP Revision Steering Committee  
U.S. Fish and Wildlife Service  
Division of Bird Habitat Conservation  
4401 North Fairfax Dr.  
Arlington, VA 22203

Gentlemen:

The Nebraska Game and Parks Commission (Commission) would first like to thank the North American Waterfowl Management Plan (NAWMP) Revision Steering Committee (Committee) for allowing us to provide comments and input into the NAWMP Revision process and recognize the challenging task in assimilating input and revising this important document.

The Commission agrees with the proposed Vision statement. However, we would like to see the language regarding "human desires" be replaced with more tangible terminology. Perhaps a more succinct Vision statement is needed, and we suggest "*Conservation and management of waterfowl and wetlands for people*" as a starting point for a Vision statement. We believe this generally identifies the goals and linkages of the Plan. The proposed goals themselves can be used as a more specific statement that defines the purpose of the Plan.

The Commission also is satisfied with the 3 goals proposed in this draft of the Revision. We realize that defining these goals was not an easy task given the breadth of concerns, interest and opinions among the waterfowl management community. We believe the goals as stated come as close as possible to meeting these varied concerns, interest and opinions without jeopardizing or changing the over-arching nature of NAWMP. For example, incorporating ecological goods and services as a fundamental objective would have potentially turned NAWMP into more of a wetland plan than a waterfowl plan. While we recognize the overall value and importance of wetlands, incorporating ecological services into a larger waterfowl habitat goal captures those values of wetlands without changing the focus of the Plan.

Formally incorporating a human dimension or use goal into the Revision is critical to the future of NAWMP and eliminates the implicit and unspecified nature of the human component in past versions of the Plan. All stakeholders involved with NAWMP deal with people at some level and the original Plan had inferences regarding human elements of waterfowl conservation and management. Explicitly stating this as a goal will allow partners to consider this in future NAWMP programs and initiatives. Considering that we have and continue to support recruitment and retention of waterfowl hunters, having a national goal will greatly assist the Commission as

well as the greater waterfowl community in identifying and implementing strategies and methods to increase the numbers of this important segment of NAWMP constituencies. However, the Commission also believes general public support for wetland protection and conservation will greatly enhance and broaden our ability to sustain waterfowl populations. Indeed, in the near future, increased general public support for wetland conservation may be our best avenue to protect and conserve important waterfowl habitats.

In regards to both the proposed Vision statement and goal regarding waterfowl hunting we would like the Committee to be aware that perpetuating waterfowl hunting under the North American model of wildlife conservation is the mode in which the Commission supports. Perpetuation of hunting under a "European" style that only allows the rich or privileged to hunt is not a type of system we support. We believe clarification of this is needed within the document contained within the Principles of NAWMP (under Principle #5).

We are certain that the Committee is aware of the ambitious nature of the Revision, as well as the implications and recognition that integrating harvest, populations and human dimensions is a major shift in the current paradigms of waterfowl management. The Commission supports the concept of integrating the various segments of waterfowl habitat conservation and harvest management. However, we also realize that the implementation of integration is going to require a lot of discussion and work, particularly if this Revision leads to or requires a change in or initiation of alternative institutions and processes. Despite the numerous and onerous challenges of integration, we believe it necessary that waterfowl conservation and management come together and become more united, particularly in this current economic situation and budgetary constraints the conservation community will be facing in the near future. The Plan has been an instrument of change in the past and we believe that the waterfowl community needs to assess the current structures, processes and institutions and change, if necessary and feasible, to become more effective and efficient in conserving waterfowl habitat and populations.

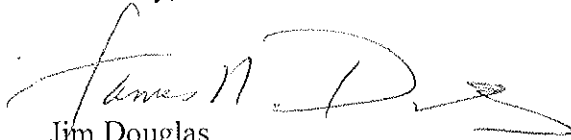
From that perspective, the recommendations provided in the draft Revision are relevant and crucial in terms of moving NAWMP into the future. The details that are to be provided in the Action Plan to move the Revision forward are of great interest to the Commission. We strongly advise the Committee to work with states and flyway councils on this Action Plan to inform and allow them to provide input in developing the details of the next steps in the Revision of NAWMP.

In the next decade, we believe the issues and demands on the waterfowl management community will be extremely complex and difficult to solve or offset. Ongoing and continued loss of waterfowl habitat appears to be the biggest and most ominous threat. Wetland drainage, conversion of prairie to crop fields, decline in the Conservation Reserve Program, energy development and exploration, climate change and other factors will perhaps subject waterfowl populations to unprecedented pressures, considering the current economic climate and agricultural commodity prices. We also expect within the next decade that the current wet cycle we have observed on the prairies will cease which will only exacerbate habitat losses. In light of habitat loss, the Commission sees the next decade as pivotal to the issue of waterfowl hunter recruitment and retention. We believe we must act as quickly as possible to engage individuals and muster support for waterfowl management and habitat activities now and into the

future. Additionally, increasing the public's support for wetland habitat conservation also will be critical in the next decade if we are to soften the blow of habitat loss we anticipate will occur. The creation and development of the Human Dimensions Working Group (HDWG) will be crucial in addressing these issues.

Thank you again for allowing us to provide input on this important document.

Sincerely,

A handwritten signature in black ink, appearing to read "James N. Douglas", with a large, stylized "D" at the end.

Jim Douglas  
Deputy Director

cc: Central Flyway Council  
Central Flyway Waterfowl Technical Committee

**From:** Bryan Swift <blswift@gw.dec.state.ny.us>  
**Sent:** Wednesday, September 07, 2011 10:13 AM  
**To:** info@nawmprevision.org  
**Cc:** Gordon Batcheller  
**Subject:** Comments on Draft NAWMP Revision Document

I'd like to offer a few general comments on the draft NAWMP Revision document.

In short, I find this to be a very disappointing revision of the NAWMP that will be largely uninteresting and uninspiring to anyone outside of the inner circle of waterfowl management. As I neared the end of the draft, I realized that it focuses almost entirely on process and institutions, with almost no discussion of the ecology and needs of our waterfowl resources. To bear this out, I did a simple word search, and found the word "marsh" appears only once in the document, with similar results for "swamp" (0), pothole (0), tidal (0), etc.

I understand that there are desires and needs related to integration of harvest, habitat and human dimensions, but the plan has lost any flavor that it had about duck populations and habitat. All that seems to have been pushed behind the scenes (in appendices, or not at all), so all that's left is 30 pages about vision, linkages, performance, capacity, etc. Compare this version to the 1986 original, or the 1994 or 2004 updates, and you'll see what I mean.

Ironically, the last recommendation in italics on page 4 is "Motivate others to join the cause". I'm afraid this version of the plan does little in that regard, and outside of a few agencies and organizations, will do little to motivate the grass roots supporters, or elected representatives, who hold many of the cards in waterfowl conservation.

Thank you for the opportunity, and I'm sorry I can't offer more constructive comments.

Bryan L. Swift  
Game Management Section  
NYSDEC Bureau of Wildlife  
625 Broadway  
Albany, NY 12233-4754  
(518) 402-8922  
[blswift@gw.dec.state.ny.us](mailto:blswift@gw.dec.state.ny.us)

## **OHIO DIVISION OF WILDLIFE COMMENTS ON NAWMP REVISION**

### **1. The greatest challenges facing waterfowl management in the next decade.**

The greatest challenge facing waterfowl management is still habitat, which was the driving force that created NAWMP and it should remain the primary emphasis of the revised plan. We acknowledge there are emerging factors that need to be addressed but increasing habitat quantity, quality and distribution on the landscape should be the primary focus of NAWMP. Concomitant with increasing commodity prices driving the conversion of grassland and pasture habitats into row crop production, government conservation incentives are being funded at dramatically lower levels than 20 years ago when waterfowl populations began to increase; this should be explicitly addressed in the revision of NAWMP.

Hunters have always been and will continue to be the best advocates for wetland and waterfowl conservation; thus, the decline in waterfowl hunter numbers is alarming. The conservation community needs to take a serious look at ways to increase the number of wetland acres available for public waterfowl hunting at the state level so that access for recreation does not limit participation and thus support for wetland and waterfowl conservation in the long-term.

### **2. The appropriateness and relative importance of the three goals.**

The three goals are good and inextricability related, no one goal can be achieved without the others. We agree they are all important to waterfowl management.

### **3. The most important, measurable objectives that would serve to accomplish the stated goals, and how to develop these.**

Population goals are very important and we already measure abundance (BPOPs) annually so it makes sense to include them here as we did in the original plan. However, at a minimum, we believe that acres of habitat within important nesting and wintering areas would also be easily quantifiable and some attempt to incorporate that metric into the measurable objectives within this revision of the plan is a necessity.

### **4. The nature of useful objectives related to recruiting and retaining waterfowl hunters.**

This is a hard metric to measure but it is no more unknown than how many green-wing teal are actually on the North American continent and we put good faith in those estimates. Waterfowl hunters are primarily declining for the same reasons that all other hunters are declining, access to hunting areas. We hear lots about "today there are so many things that a 15-year-old kid can do compared to 50 years ago." While that statement is true another statement that is also true is that 50 years ago there were probably a few marshes within 20 miles of that kid's house that held ducks every fall and if you went and asked the person that owned them to hunt they would probably let you. Today,



those marshes have been drained and more corrugated field tile is put in the ground every year to ensure that those fields that were once wetlands stay high and dry. If there is a wetland near the kid's house that holds ducks every fall, likely some avid waterfowler who lives 60 miles away has probably found and leased it so that they can have a place to hunt, because all of the habitat around where they live has also been converted into agriculture or strip malls.

While all three fundamental objectives are clearly linked, we believe continued emphasis within the plan on habitat conservation is paramount and likely driving all of the other issues of concern addressed in the NAWMP revision.

**5. The means to engage a broader constituency (i.e. beyond hunters) in the cause of waterfowl conservation.**

While we do acknowledge there are other users of the waterfowl resource that exist, past efforts to engage these groups, especially financially, have fallen short. Hunters as a group have proven to be willing to advocate the importance of waterfowl and habitat conservation in the political arena and contribute financially to the cause. This group, although engaged, could probably be utilized more efficiently and exploring ways to increase hunter involvement should be a priority.

A secondary focus on engaging the general public and others who appreciate wetlands and waterfowl through activities other than hunting is needed but likely will take longer and much more effort to reap benefits to waterfowl management and wetland conservation.

**6. The concept of integrated waterfowl management and the greatest challenges/benefits likely associated with integration.**

The objections we have to integrated waterfowl management as laid out in this revision of NAWMP is that we see little direct "on the ground" benefits to waterfowl as we read the goals of this plan. As a community, we integrate, talk, meet, and over-complicate the process to the point that waterfowl see no real gains (or more realistically stabilization at the current level) in populations or acres of quality habitats at the continental scale. We would like to see the linkage between the two (integration and habitat) more clearly defined so that the path forward and tangible benefits are evident to the broader waterfowl management community.

**7. Strategies that would make waterfowl management more efficient, effective and responsive.**

Harvest management has become overly complicated with changes in regulatory packages or bag limits that chase population fluctuations when often the primary drivers of those changes are not a result of harvest - more stability in regulations, efforts to increase opportunity, etc. would likely be beneficial for recruitment and retention strategies. More time and energy by the conservation

community could then be directed toward "on the ground" implementation of habitat programs.

**8. The necessity of changing or adapting our current institutions in order to implement the new NAWMP and the nature of the changes that may be warranted.**

No specific comments.

**9. The sufficiency of proposed recommendations and action steps to move this plan forward.**

The proposed recommendations in this plan will probably help the waterfowl management community become more integrated to some extent. We are not convinced, however, that integrating the waterfowl community is more important than continuing to identify threats to wetlands and waterfowl habitat, meeting specific habitat goals (quality, quantity & distribution) and, thus, ensuring our subsequent long-term ability to sustain waterfowl populations at desired levels for our entire constituency to enjoy.

**Ministry of Natural  
Resources**

Biodiversity Branch  
P.O. Box 7000, 300 Water Street  
5<sup>th</sup> Floor N  
Peterborough ON K9J 8M5

**Ministère des  
Richesses naturelles**

Direction de la biodiversité  
C.P. 7000, 300, rue Water  
5<sup>e</sup> étage Nord  
Peterborough (Ontario) K9J 8M5



September 26, 2011

NAWMP Revision Team

Re: NAWMP 2012

Thank you for the opportunity to comment on the 2012 North American Waterfowl Management Plan. It is evident that a great deal of effort has gone into developing the plan and the document is thought provoking.

The Plan suggests the need to consider a significant shift from the current model of North American waterfowl management, but it does not make clear what the new model may look like and as a result it is somewhat difficult to comment on the Plan at this time. We expect that the Action Plan will clarify the direction that is being proposed. The potential benefits of changes to the waterfowl management enterprise can only be considered improvements if the critical outcomes and successes of the current system continue to be achieved.

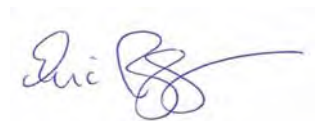
Given Ontario's size, diversity of habitats, waterfowl species, and geographic location within two flyways, the province plays an important role in North American waterfowl conservation. The federal government in Canada has the lead role in managing waterfowl populations, and Ontario has the lead for habitat conservation and management within the province. The NAWMP has been an important vehicle enabling the Ontario Ministry of Natural Resources (OMNR) to link wetland and waterfowl conservation activities in Ontario to continental objectives. Ontario representatives participate in all facets of NAWMP, including flyway councils and habitat/species joint ventures, and consider NAWMP to be an important foundation for several provincial programs.

Wetland conservation continues to be a priority area for action in Ontario and provincial funding to the Eastern Habitat Joint Venture's wetland conservation activities contributes to the achievement of habitat conservation objectives in the NAWMP. Considering the vital link between habitat and populations and threats to wetland habitat, the Plan should have greater recognition of and emphasis on the need for continued habitat conservation. Moreover wetland conservation contributes to a variety of important goals including, but not limited to biodiversity, water quality, and habitat for numerous flora and fauna. Ensuring broad public support for financial investment in

NAWMP partnerships will depend on our collective ability to communicate the multitude of benefits that waterfowl and their habitats mean to the public's quality of life.

OMNR remains committed to the biological and current philosophical foundations of NAWMP, and is interested in discussing paths forward for both the Plan and the committees that support its implementation. We look forward to the release of the Action Plan. Given the potential implications of a significant shift in the direction of waterfowl management I anticipate that it will take some time for NAWMP partners to fully digest and understand what is put forward in the Action Plan. Therefore I would expect partners to have adequate time to review and comment on the Action Plan portion. I will also continue to discuss the draft NAWMP and Action Plan with my colleagues across Canada and you can expect further comments in the next phase of this effort.

Sincerely,

A handwritten signature in blue ink, appearing to read "Eric Boysen", with a stylized flourish extending to the right.

Eric Boysen  
Director, Biodiversity Branch  
Ontario Ministry of Natural Resources

## **Comments related to key questions posed by the Revision team:**

### **The appropriateness and relative importance of the three goals**

- The expansion of the goals and purpose of NAWMP beyond simply restoring habitat for waterfowl and focusing on a broader array of ecological benefits of wetlands will reach a broader audience and acknowledges and addresses the interests of the Ontario public.
- Supporting recreational opportunities, valuing the ecological services that wetlands provide and engaging the entire conservation community in wetland conservation is critical to the continued success of the NAWMP.

### **The means to engage a broader constituency (i.e. beyond hunters) in the cause of waterfowl conservation**

- Engaging the broader public in conservation efforts that benefit waterfowl, will require the communication of benefits associated with complimentary ecological, economic and social benefits of wetlands.
- Although waterfowl hunting is important, to engage a broader constituency, NAWMP's marketing strategy must include recognition of all ecosystem benefits provided by wetlands.
- Enhance the integration of waterfowl conservation with other bird conservation activities through initiatives such as the North American Bird Conservation Initiative.

### **The concept of integrated waterfowl management and the greatest challenges/benefits likely associated with integration**

- To complement the benefit of articulating clear quantifiable objectives, identifying a process to enable continuous adjustment of these objectives will help ensure an adaptive approach.

### **The necessity of changing or adapting our current institutions in order to implement the new NAWMP and the nature of the changes that may be warranted**

- A review of the number of committees and working groups is always valuable.

### **The sufficiency of proposed recommendations and action steps to move this plan forward**

- Wetland conservation activities will continue to be an important part of Ontario's waterfowl management strategies. The Plan should acknowledge that implementation of conservation actions is still an important NAWMP activity.

**From:** MacGregor, Pat <Pat.MacGregor@AGR.GC.CA>  
**Sent:** Monday, September 26, 2011 11:44 AM  
**To:** info@nawmprevision.org  
**Subject:** RE: NAWMP Draft Document Comment Period Open through September 25

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hi Jim – hope all's well!

**RE: NAWMP Revision – here's a few comments for consideration...**

Generally speaking, everyone must be commended!  
NAWMP 2012 has been well written, with input from science and policy experts, and numerous consultations.

I think it is a good document, and I am very supportive of the efforts – however I think that **the 'hidden/given assumption' needs to be stated clearly – the landowners who provide waterfowl habitat need to be involved right from the start** – they need to be part of the discussion, and they need support in terms of knowledge, technical support for restoring habitat, and incentive funding to help with their own stewardship efforts.

We're all fully aware that historically, wetlands have been drained for agriculture... and it continues in some circumstances... but if we want to change the trend, restore wetlands for all the benefits they provide (good 'selling feature'), and increase habitat for waterfowl, then we have to work with the people!

**Farmers, ranchers, and other land owners** need to be referenced throughout the report, and involved at numerous and various stages. What we don't want is for farmers, ranchers, and other land owners to feel that 'gov'ts are planning for/dictating the use/management of their private land'. Their farm (or other use) is their land, their business, and their livelihood. If they are 'told what to do with it' we'll get the reverse reaction of 'gov't get off my land'.

Just a few other comments:

The vision & goals are good; an integrated system is a must, but we also need regular regional monitoring which feeds back into the system; monitoring is especially important given the ever-increasing extreme weather events, with resulting flooding/drought conditions.

There is a need to better educate and inform OGDs – many have not even heard of NAWMP! There are a lot of staff changes & retirements happening, without mentoring; there are budget cuts everywhere, but new policies and programs are always being developed – there is a strong need for continued messaging!

**There would be great value in re-activating a federal/national stakeholder wetlands forum – to inform, share information, and gain support for NAWMP.**

**Farmers, ranchers, and other land owners** who provide habitat for migratory waterfowl must be acknowledged all through this document – as well as the Agricultural sector who represents and supports the business of agriculture, sustainable use of resources, Environmental Farm Plans (EFPs), and Beneficial Management Practices (BMPs), etc. - a few suggestions are shown below in blue - below, however **I would recommend inserting landowner references throughout the entire document.** Let's remember too that many farmers and ranchers are also hunters...

Hope this helps...

Thanks for the opportunity to comment... Pat

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#### Executive Summary

The North American Waterfowl Management Plan (NAWMP1 or Plan) has a remarkable conservation legacy and remains one of the most successful conservation initiatives ever undertaken. The Plan has always endeavored to benefit and inspire action by agencies, waterfowl hunters, other conservationists and citizens with a passion for waterfowl and wetlands, while

recognizing that support from diverse segments of society is crucial to the Plan's success. This is a proud heritage to build upon.

But ours is a time of mixed signals for waterfowl management. The 2011 breeding population index of ducks in the traditional survey area is among the largest ever recorded, and the size of the duck and goose harvest has rebounded to that of the 1970s – the baseline period for the original Plan. However, the number of U.S. waterfowl hunters continues to decline. Threats to critical waterfowl habitat are mounting in all three countries, even as federal, state and provincial agencies slash their conservation investments to deal with new fiscal realities. Successive years of good moisture on the breeding grounds may have temporarily boosted duck populations and harvest, but there is danger in complacency. In the face of accelerating economic, social and ecological change, the future of the waterfowl resource, and the legacy of waterfowl hunting, is far from secure.

It is critical that we redouble our conservation efforts, reverse the decline in hunter numbers, and reach out to other members of society who benefit from, and could contribute to, wetland and waterfowl conservation. The Plan must continue to evolve and address these challenges, and we are well-positioned to do so. A hallmark of the NAWMP community has been our capacity to adapt and to continually improve our harvest, habitat and other management programs.

As part of the scoping for this Revision, the waterfowl management community was asked to review and re-establish fundamental goals for our enterprise – something that had not been done in 25 years.

A renewed purpose statement for the Plan evolved from those consultations:

To sustain North America's waterfowl populations and their habitats at levels that satisfy human desires and perpetuate waterfowl hunting, accomplished through partnerships guided by sound science.

**Further, three goals emerged as being fundamental to the Plan's success:**

Abundant and resilient waterfowl populations to support hunting and other uses without imperiling habitat.

**Wetlands and related habitats sufficient to sustain waterfowl populations at desired levels, while providing landowner benefits, ecological services that benefit society, and places to recreate.**

Growing numbers of waterfowl hunters, other conservationists, **landowners**, and citizens who enjoy and actively support waterfowl and wetlands conservation.

While each goal has intrinsic value, they also have utility in helping to achieve other goals. For example, healthy waterfowl populations are necessary for waterfowl hunting, viewing, and other

<sup>1</sup> See Appendix A for a list of acronyms used in this Plan.

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recreational activities. Wetlands are essential for sustaining populations as well as providing places for waterfowl-related recreation. Waterfowl hunters and other supporters provide funding and advocate for public policies that conserve wetlands and other waterfowl habitat. Thus, actions undertaken to accomplish one goal have consequences for achieving the other goals. They are inextricably linked.

Simultaneously pursuing multiple, linked goals requires a coherent, integrated system – something that does not exist in North American waterfowl management. Implementing such a system will be challenging, but doing so will make waterfowl management more effective, efficient and adaptable. This is the vision of the NAWMP.

An integrated system would feature:

Quantifiable objectives established in support of the goals, for which we can prescribe actions and predict outcomes;

A overarching framework, supported by linked models, which enables managers to understand and balance tradeoffs among the goals and objectives;

A system that links objectives and ensures coherence across focus area, Joint Venture, and continental scales;

An inter-related set of decision models that managers can use to efficiently allocate resources to achieve the objectives, recognizing that a single model will not be adequate to encompass all decisions;

Monitoring systems that track progress towards objectives and enable a comparison between observed versus predicted outcomes; and

Institutional and cultural change to facilitate an integrated system.

As was the case with the original NAWMP, this Revision proposes new actions and a new vision for waterfowl management, recognizing that implementation will occur only if the ideas herein are sufficiently compelling to move the management community to action. The following recommendations will illuminate the path to a new era in waterfowl conservation:

**(These actions and vision are good – but Agriculture must be ‘at the table’ - a great percentage of wetland habitats occur in the agr landscape... farmers/landowners must be involved in the ‘way forward’... the ‘Human Dimension’ needs to include not only support for the hunter sports, but also landowner support for wetlands conservation.)**

**Adopt common goals** – An extensive consultation process has led to the formulation of three goals for waterfowl management described in this Revision. Embracing these as common goals will help unify the waterfowl management enterprise.

**Adopt the vision of an integrated enterprise** – The need for an integrated management system is apparent. There are substantial benefits to working towards common objectives within a framework that will enable us to acknowledge and balance trade-offs among objectives and actions.

**Actively manage the linkages within waterfowl management** – The linkages among waterfowl populations, habitats and users/supporters are vital to the functioning of our enterprise. They must be actively managed with the same level of forethought and planning as we employ to achieve the goals themselves.

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**Embrace the imperative for change and adapt accordingly** – The manifold changes affecting waterfowl management are overwhelming our current approaches to conservation. We must continue to develop management frameworks that acknowledge these changes, and adapt accordingly to sustain waterfowl, their habitats and a responsive waterfowl management enterprise.

**Continue to improve our management performance** – Numerous advances have been made by posing – and answering – the basic question of, “are we doing things right”? More significant change has resulted from asking ourselves, “Are we doing the right things”? We are now at a juncture where we need to address even higher-order questions: do we have the proper decisionmaking tools, institutions and governance to accomplish our goals?

**Establish a process for institutional review and change** – Ideally, institutions evolve to enable management systems to function efficiently. However, sometimes institutional change must help lead the way towards a better approach of doing business. This Revision is intended to prompt the management community to actively consider appropriate institutional changes to enable an integrated system.

**Increase our institutional capacity to address the changing social landscape** – An essential first step will be to establish a Human Dimensions Working Group for waterfowl management. An HDWG will provide the necessary expertise to accomplish the third goal of this Plan – growing the number of waterfowl hunters, other conservationists, and citizens who enjoy and actively support waterfowl and wetlands conservation.

**(The ‘Human Dimension’ needs to include not only support for the hunter sports, but also landowner support for wetlands conservation.)**

**Motivate others to join the cause** – As we consider how we position waterfowl management for the future, we must also commit ourselves to enlarging our base of supporters. For decades, waterfowl hunters have provided the financial and political foundation for waterfowl conservation. It is time to motivate a broader segment of society to participate in this cause.

The inseparable linkages among waterfowl, habitat and people are reaffirmed in this Revision. Achieving our shared goals will require that we work together in a manner that is more



integrated, effective, efficient and adaptable than ever before. Creating an integrated system of waterfowl management will require that we re-examine our institutions and our traditional ways of doing business. To move us further towards coherence and integration, the NAWMP Plan Committee should continue to play a temporary facilitation role, assisted by a technical team, until such time as the federal wildlife agencies **(and other government departments/agriculture)** create a more permanent coordination structure.

Developing an integrated management system will be an evolutionary process, not a singular event. It may be technically challenging, however those challenges will be more than offset by greater efficiencies and effectiveness. Now is the time to commit to the task.

North American Waterfowl Management Plan 2012 (draft) 5

Introductory Material (to be added)

Signature page for ministers (with short context paragraph in 3 languages)

National Overviews provided by the federal wildlife agencies (Canada, United States and Mexico)

Preface (by Plan Committee)

Dedication (by Plan Committee)

Acknowledgements (by Plan Committee)

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## Introduction

### For Whom is this Plan Written?

This Plan was developed in consultation with the waterfowl management community, and is intended to be used by those who manage waterfowl harvest, deliver habitat conservation programs, and ensure that diverse groups of people can continue to use and enjoy the waterfowl resource. It was written primarily for the benefit of people who interact most closely with the waterfowl resource: **landowners**, waterfowl hunters, other conservationists and citizens whose passion is waterfowl and wetlands.

Other members of society are crucial to the success of this Plan. Societal support for the conservation of wetlands, grasslands and other landscape features may occur for reasons other than waterfowl conservation. Nonetheless, these features may contribute significantly to achieving Plan goals. Lastly, there are many affected parties who we reach through this Plan, or who can affect the outcome of this Plan through their independent actions. **Farmers, ranchers, and other landowners**, and government municipalities are obvious examples.

Without the habitat they provide, the goals of the NAWMP cannot be achieved.

Finally – and most importantly – this Plan is for the 37 species of ducks, geese and swans that traverse North America, providing countless hours of enjoyment and a connection with nature and the great

outdoors that enriches our lives.

---

**Pat MacGregor**

Policy Intelligence Gathering | Politique en cueillette de renseignements

Policy Development Division | Division de l'élaboration des politiques

Agri-Environment Services Branch | Direction générale des services agroenvironnementaux  
**Agriculture and Agri-Food Canada | Agriculture et Agroalimentaire Canada**

Tower 4, 4th floor, Room 119 | Tour 4, 4e étage, pièce 119  
1341 Baseline Road | 1341, rue Baseline  
Ottawa, Ontario K1A 0C5

[pat.macgregor@agr.gc.ca](mailto:pat.macgregor@agr.gc.ca)

Telephone | Téléphone 613-773-1218  
Facsimile | Télécopieur 613-773-1222

[Government of Canada | Gouvernement du Canada](#)

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-----Original Message-----

**From:** North American Waterfowl Management Plan Committee [mailto:[info@nawmprevision.ccsend.com](mailto:info@nawmprevision.ccsend.com)] **On Behalf Of**  
North American Waterfowl Management Plan Committee

**Sent:** August 25, 2011 9:45 AM

**To:** MacGregor, Pat

**Subject:** NAWMP Draft Document Comment Period Open through September 25

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## NAWMP Revision Comment Period Open August 25 through September 26

**Dear Pat,**

We are now seeking written comments on the draft revision of the North American Waterfowl Management Plan (NAWMP). Comments may be submitted in several ways:

- Use the [Web Form](#)



September 28, 2011

To: NAWMP Revision Steering Committee  
From: Prairie Habitat Joint Venture  
Subject: PHJV Comments on the NAWMP Revision Draft

Prairie Habitat Joint Venture partners appreciate all of the thought and hard work that has gone into the draft revision thus far. We are in general agreement with the overall approach of the Plan revision. We do offer the following comments for your consideration:

1. The front end of the document, and in particular the executive summary, need to be rewritten to place greater emphasis on the overall importance of waterfowl (to ecosystems and biodiversity), the threats and challenges facing waterfowl conservation, and provide a more accurate picture of the status of populations and habitats. As worded now, there really is no critical need identified to redouble efforts, increase hunters, and reach out to others. The current waterfowl situation has been quickly dismissed as having populations at all-time highs without recognition that this current situation is largely a temporary artifact of the current record high wetland numbers in the mid-continent region. Emphasis should be placed on the overall declining trend for populations, species of concern, over-abundant populations, etc. followed by the direct relationship of populations to the many threats (bullets on pages 15 and 16).
2. The Purpose and Goals should be reviewed and reworded to be more inclusive of the diverse needs of all Joint Ventures and jurisdictions. The phrase "satisfy human desires and perpetuate waterfowl hunting" sounds too self-serving. "Healthy" populations speaks to a broader purpose than just human use. Previous purpose statements (e.g., 2004 and 1994) are more general and that trend should continue to be more useful continentally. We suggest the first goal should speak to the health, abundance, and resilience of waterfowl populations without reference to people or habitats. The second goal should speak to the wide array of healthy habitats, including wetlands, uplands, coastal, etc. required to sustain healthy populations. The third should focus on the need for a strong societal base that understands and appreciates waterfowl and their habitats.
3. It is apparent that the new Plan wishes to entrench and address the legacy of waterfowl hunting. We fully agree that waterfowl hunting and hunters have been a critically important stakeholder and support base for the Plan and we agree that it is important to continue to encourage and strengthen this base. We recommend applauding the importance of hunting and hunters, and clearly stating all the reasons why they are important, as an inset or separate component (perhaps at the front end) and highlighted in the executive summary. This section can then be used as an *example* of how to address the greater challenges of the NAWMP over the next 25 years without limiting JVs and jurisdictions to focusing solely on hunting.





In some jurisdictions, there may be significant risks of entrenching the waterfowling goal so forcibly, particularly in Canada. As an example, one specific audience critically important to the PHJV is the private landowner. Too much emphasis on abundant populations for hunting can be viewed negatively by the private landowner, and have an adverse effect to conservation efforts, as one example - through the drainage of wetlands in attempts to decrease waterfowl damage. However, the common thread of private landowners and waterfowl hunters is their connection to the landscape. Reaching out to Prairie landowners through their needs and desires will be different than with hunters, but the end result of landscape conservation, will be the same.

Urban citizens are also becoming increasingly important and the polarization of views between the hunting fraternity and urban citizens may be growing. Embrace their engagement in conservation in rural and natural areas will also require different approaches to be effective.

4. We challenge that the bigger threat to not achieving our collective goals is the general lack of a broader base of support for our work rather than not having an integrated approach. Ken Salazar's quote on page 16 should be repeated in the Executive Summary. The shift to an even more intensive waterfowl and waterfowling focus might actually be perverse in nature as it may lead to the perception by outsiders that the NAWMP is elitist or singular issue in nature – which will not be very conducive to garnering that additional support needed.
5. We support the impetus to try to increase capacity to address the changing social landscape. However the mandate of the HDWG is very limited as it is largely focused on the hunting fraternity. We suggest broadening this group to a "Social Dimensions WG" that should attempt to address the many other social drivers and barriers to NAWMP success – especially in garnering public and political support for NAWMP resources. We hope that all jurisdictions and JVs have an opportunity to provide input and help guide this effort.
6. We support the notion of integrating population, habitat and human dimension objectives into waterfowl management. Looking at adaptive management strategies, assessing the management performance of the goals and linking the goals to institutional change as it relates to a changing social landscape, are all very future oriented and can only help to sustain the momentum of a continent wide conservation initiative that is already second to none. There were numerous statements about the inefficiencies being readily apparent. A brief discussion of those and the merits of the increased efficiencies would be helpful to better understand how we might benefit from this new model and then discuss if/how it will be worth the efforts and risks.
7. There is very little reference to science and biodiversity in this Plan. While we appreciate the emphasis of this Revision is on integrated waterfowl management, the science is so fundamentally important to our Plan that it should continue to read prominently in all NAWMP updates. Also, NAWMP's role in broader biodiversity achievements should be more prominently emphasized to engage a wider audience and garner the broader political and public support necessary to achieve our goals.



8. The primary purpose of NAWMP is still to sustain N.A. waterfowl populations, yet the Plan lacks details on any waterfowl group and their associated issues. Mid-continent duck population status is mentioned in passing and then the focus shifts to hunter numbers and decision-making processes (primarily for mid-continent ducks). The original plan contained a summary of waterfowl status, management, goals and recommendations in individual sections for ducks, geese and swans. It is a high level strategic document, but it should still provide some brief summary of status, plan successes, remaining issues/priorities for ducks, geese and swans. Current biological issues/priorities have been too quickly dismissed.
9. A brief analysis about the barriers or drivers to reduced hunter numbers so we can be strategic in reversing the trends would be helpful. Perhaps this will be addressed in the Action Plan.
10. Given that we are now 25 years into the Plan, are there failed assumptions in the previous Plan updates that should be addressed going forward?

On behalf of the PHJV Advisory Board and partners, we thank you for the opportunity to comment and we look forward to continuing our collaboration with all JVs and partners on NAWMP.

Yours sincerely,

David Ingstrup  
Chair, Prairie Habitat Joint Venture  
Advisory Board





## **Prairie Pothole JOINT VENTURE**

### **North American Waterfowl Management Plan 2012 Responding to Change: A Vision for Integrated Waterfowl Management Prairie Pothole Joint Venture Comments September 2011**

Dear North American Waterfowl Management Plan Revision Team:

Thank you for the opportunity to provide comments on the draft revision of the North American Waterfowl Management Plan 2012 on behalf of the Prairie Pothole Joint Venture (PPJV). The PPJV represents the primary waterfowl nesting region of the United States and the regions' importance to continental waterfowl populations can not be overstated. Consequently, the intent and direction of this revision is of significant interest to the PPJV.

We commend your efforts to address the daunting task of integrating waterfowl populations, habitat, and human dimensions into a cohesive framework. Thank you for your quality work and highlighting the uncertainties in waterfowl management. In an attempt to help inform this process we respectfully submit a number of general and specific comments below.

#### General Comments

- What is the singular "primary purpose" of the waterfowl management enterprise? Or put another way, what is the cornerstone that holds up this house? Past experience informs us when confronted with difficult decisions that require trade-offs, meaningful action becomes fleeting. When individual interests fail to accept one common element in a multifaceted effort, they can back into their respective corners. Having said this, is the primary purpose "to sustain waterfowl at some measure in perpetuity?" "to protect, conserve, or manage necessary habitat" or "to have happy and more hunters / birdwatchers?" Perhaps it's something else? The authors acknowledge that these "goals" are "inextricably linked" yet is there an "ultimate goal" that stands as the guiding light for all actions to follow?
- Perhaps it is the intent, but the document reads more like a conceptual paper than a plan....it would benefit from more action related details that inspire the reader. Along those lines, you may want to consider making it more reader friendly (i.e.

define some of the terms, use plain language, and include a bulleted list of actions before the narrative).

- How many ducks/geese are enough? How much habitat is needed for breeding, migratory, and wintering birds? We suspect these questions will be addressed in the action plan, but perhaps the Introduction can be expanded to inform the reader why we currently have strong waterfowl numbers, and why it matters if threats to critical waterfowl habitat are being expressed across the continent. How are we doing compared to past “updates” vision and goals? Our community is experiencing high turnover, so the Revision may provide an opportunity to educate newcomers and invigorate those who have served a number of years in waterfowl management.
- There appears to be an overwhelming focus on “marketing,” or “recruitment and retention” of hunters rather than a heavy focus on the intrinsic value of wetlands and waterfowl. Along those lines, there is concern that considerable funding is shifted away from habitat conservation toward human dimension efforts. However, we are not suggesting you should abandon the human dimensions effort, yet a number of states, ngo’s, and official bodies have efforts focused on hunter recruitment and retention. Consequently, we urge a level of caution on the amount of effort undertaken via the NAWMP, since it’s possible we could reach out to those current efforts to meet our needs.
- We appreciate the focus on the Adaptive Management philosophy since this will allow the enterprise to remain “agile” in the face of an uncertain future, budgets, and changing demographics.
- As this effort moves forward, we need to ensure that minimal additional bureaucracy is created beyond what currently exists.
- Much of the heavy lifting and decisions appear left to the NAWMP Plan Committee and the proposed Integration Technical Team. We find this unfortunate since the Revision – as is the case with other Plan updates – will be signed by the highest levels in the conservation field. Consequently, there is more commitment and weight behind the actions and decisions identified in the Revision document via their signatures than future documents developed by various committees and teams.

### Specific Comments

- Page 3: last paragraph at the bottom of the page.....“Actively manage the linkages within waterfowl management” - it is unclear how “manage” is defined in this context.
- Page 4: *Motivate others to join the cause* – expanded text under this heading might include acknowledgement of the multi-species benefits, benefits of properly functioning ecosystems, and any other appeals that will attract the attention of a broader audience to our conservation efforts. We need to sell a product that will attract the broader audience to help them understand that preserving a proportion of wetland and upland habitat isn’t solely a tool to reach a waterfowl population goal.

- Page 11: We recommend “such as Ducks Unlimited in 1937” be removed in an effort not to offend conservation partners.
- Page 11: In this time of intense focus on government spending and poor economic conditions, you may consider removing reference to \$4 billion and 15.7 million acres. Further, to add on this recommendation we point out there is no context to judge how much more is needed to reach “goals,” so the reader can’t assess “what’s next?”
- Page 11: Isn’t “Mid-Continent mallards” the current driver of the AHM process? The sentence suggests this isn’t necessarily the case. Even though an insignificant number of models are underway for other populations (or species), do we need to reexamine what is used to drive the harvest packages?
- Page 14: Most reference to habitats relates to wetlands, which is expected given their importance, however the document would benefit by a greater explicit mention of “associated waterfowl habitat” (i.e. uplands).
- Page 17: Again, recommend deleting “Ducks Unlimited” or expanding it to include a few other conservation organizations.
- Page 18: Last paragraph, third line down – strike “is” (.....waterfowl management is depends on.....)
- Page 19: There is concern the bullets are somewhat complex. In particular, essentially every bullet speaks to “models” and our over reliance on models is both concerning and can lead managers to ignore the document. For example, all look at AHM and ask the waterfowl community who really understands both the input and output. You will most likely hear in the affirmative from technical experts, but not from land managers and waterfowl hunters. We must be careful not to move into a completely theoretical approach.
- Page 19: The third bullet should include “Flyways,”.....”coherence across focus area, Flyways, Joint Venture, and continental scales.”
- Page 20: On the bottom of the page, it should read, “National Wildlife Refuge System” and not the “National Fish and Wildlife Refuge System.”
- Page 21: *Monitoring systems that track progress toward objectives and enable a comparison between observed versus predicted outcomes.* This is a key point to help refine our efforts.
- Page 23: May want to expand the membership of the “ITT” to include management types, JV Coordinators, or others who can serve as a sounding board or reality check on time, budgets, priorities.
- Page 24: In an attempt to provide a stronger statement, perhaps the heading can be changed from “Summary of Recommendations” to “Future Requirements”

Respectively submitted,



Casey Stemler  
PPJV Coordinator



**From:** Rick Warhurst <rwarhurst@ducks.org>  
**Sent:** Friday, September 23, 2011 11:34 AM  
**To:** info@nawmprevision.org  
**Subject:** NAWMP

Questions:

- The loss and degradation of habitat, both wetland and upland nesting cover, are the greatest threats to waterfowl populations.
- I think the three explicit goals are pertinent, accurate and succinct. They summarize what the NAWMP should accomplish over the next decade.
- Habitat acres, both wetland and upland, should be monitored and changes to the landscape determined, perhaps every third or fifth year. Accurate determination of the May Waterfowl BPOP and distribution should be maintained. This survey has served well since 1955 and should certainly be continued. It is the most important tool used to measure the status of waterfowl on the NA continent. Other surveys are important but the May survey is vital.  
Market Duck Stamps more broadly and expand stamp sales. It is time for the price of the Duck Stamp to be increased. Monitor waterfowl hunter numbers. Develop methods and procedures for increasing waterfowl hunter numbers. We will have to be more creative in accomplishing this.
- Again, some creative thinking and procedures will likely be required to recruit new waterfowl hunters and retain present hunters. Waterfowl populations need to be maintained in order to have much chance of recruiting new hunters. Waterfowl hunting has to be fun and not complex. Relatively easy access to hunting areas is a must for hunters.
- All users of wildlife populations, particularly bird populations, need to supply funding to support habitat programs. That may mean the purchase of federal Duck Stamps to visit all National Wildlife Refuges. State wildlife conservation programs should be improved to focus more non-consumptive user's participation in habitat programs (special use stamps, direct spending measures, etc.)
- The real key for having satisfactory waterfowl populations is having adequate habitat. Incorporating human dimensions and determining what can increase waterfowl hunter participation and determining how to get the general public excited about waterfowl and the necessary habitat is commendable and a worthy goal. But the bottom line is how can we maintain and increase waterfowl habitat irregardless of how that is accomplished. Understanding hunters is commendable but is only a means to attain the key goal and objective; habitat.
- Incorporating more time, energy, funds and focus on maintaining and managing habitat by agencies, state and federal, and NGOs. That is the principle strategy.
- There possibly could be much less time devoted to setting hunting regulations and more energy expended in habitat work by waterfowl managers. I do believe annual modifications of regulations might still be needed but there should be much more flexibility in establishing hunting seasons. The federal government needs to make some adjustments in attitudes and procedures.
- The proposed steps are correct. I strongly believe that the various waterfowl population objectives established in the original 1986 NAWMP should ne maintained. Those are goals that habitat managers should seek to attain through habitat protection, restoration, creation, enhancement and management. The population objectives were set for good reasons and I believe those reasons still exist. For habitat managers, the task will not be easy as increased habitat destructive pressures are being placed on the landscapes, particularly on the breeding grounds, but again these are goals that as wildlife biologists we should dedicate our daily work ethics and schedules to in attempt to attain the habitat to support the stated population objectives.

Rick Warhurst  
2114 North 7<sup>th</sup> Street

Bismarck, ND 58501

## Rex Johnson 2012 Draft NAWMP Revision Comments

1. The document is highly theoretical and will not be particularly easy to read. Complexity and length suggest to me that most people will not read the document. The executive summary needs a plain language rewrite. I'd try to shorten it significantly overall.
  2. Updates and Revisions are commonly a call to action with minimal narrative. This reads more like a white paper. I know an action plan is also being prepared. I'd merge the two or make this more action oriented. The feel of this document could be improved by keeping the summary at the end but having a bulleted list of actions before the narrative rather than a restatement of the actions scattered through the narrative at the end (starting on page 26).
  3. The first goal (page 2 and 8) doesn't make sense as written "Abundant and resilient waterfowl populations to support hunting and other uses without imperiling habitat". How will abundant waterfowl populations, hunting or related uses imperil habitat. Drop "without imperiling habitat".
  4. On page 2 - last 2 lines - just say that the goals are independent or that they are inter-related.
  5. Page 3 - An integrated system would feature: Way too much jargon here. Somewhere (probably multiple places, linked models, linked decisions, coherence among focus areas and an integrated system need to be defined in simple terms.
  6. Page 3 - This is not a new vision - it is a new approach that explicitly recognizes the inter-relatedness of decisions and actions.
  7. Page 4 - Plain language rewrite
  8. Page 4 - need a paragraph that succinctly describes the vision and what coherence and integration mean. Remember how much confusion there was about the term coherence a few years ago by professional waterfowl biologists?
  9. Page 7 - 2 years is no time at all 5-10 is a more realistic time frame.
- Page 13 - Yellow line doesn't show up. Need a different font on axis labels that isn't so blocky.
- Page 19 - 20 so complex they could actually drive jvs and others away from NAWMP and toward other bird initiatives. I suggest a technical appendix but make this much more simple. Scales should be specified as should responsible parties. This will also create a greater sense of a call to action.
- Page 24 - "Summary of Recommendations" should be changed to "Future Requirements" - it's a stronger statement.
- Page 26. Item 3 - These are all items in the NSST work plan. I get the feel someone is trying to pull a fast one and get rid of the NSST without saying so., I've been told the ITT will be a subgroup of the NSST but its net effect will still be the NSST will go away. If that's what the PC wants they should just say so. We got rid of the Continental Assessment Team, now the NSST. Since these problems are still pretty difficult and there's no dedicated staff, I'll wager the ITT lasts less than 5 years too.
- Page 38 - end of paragraph 1 - who were these professional waterfowl biologists, managers and administrators invited to consult? I certainly wasn't and I don't recall an effort to consult with the NSST as a group.

**From:** Saigeon, Lyle ENV <Lyle.Saigeon@gov.sk.ca>  
**Sent:** Friday, September 02, 2011 2:21 PM  
**To:** info@nawmprevision.org  
**Subject:** NAWMP Draft Revision Document

Good afternoon ;

On behalf of Saskatchewan I offer the following general comments;

Having participated in one of the sessions I can appreciate all of the thought and hard work that went into this document. It is a well written document and as it speaks to the overall direction of the plan at a high level we find no points of any significant concern. That said, a few observations. We applaud the notion of integrating population, habitat and human dimension objectives into waterfowl management. It is important to keep sight of the fact however that for Saskatchewan, and I suspect the majority of Canadian jurisdictions, the human dimension must consider a broad audience recognizing that hunters remain an important audience. One specific concern we have relative to human dimension is that it appears that nowhere in the plan does the concept include a notion of the tolerance capacity of private landowners. In Saskatchewan we see local instances where healthy waterfowl populations have actually created a negative threat to wetland conservation. Wetland drainage is considered by some to be an effective way of reducing risk of crop damage by waterfowl. Although this action has no significant effect on the perceived problem it illustrates the importance of landowner acceptance of conservation actions.

Saskatchewan's focus on wetland conservation within the context of broader ecosystem management recognizes that waterfowl are an important component. It will remain important to that integrating habitat and population objectives consider provinces' increased effort on having habitat objectives fit within the broader concept of landscape conservation and conservation of other species.

We may have additional more detailed comments before sept 6th. Thanks for the opportunity to comment.

*Lyle Saigeon  
Executive Director  
Fish and Wildlife Branch  
Saskatchewan Ministry of Environment  
office:(306) 787-2309  
cell: (306) 536-3901*

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**From:** NAWMP [NCR] [<mailto:NAWMP@ec.gc.ca>]  
**Sent:** Thursday, August 25, 2011 11:34 AM  
**To:** Smith,Barry D [PYR]; Van Havre,Basile [NCR]; Hammond,Blair [PYR]; Danielle St-Pierre; Ingstrup,David [Edm]; Bliss,Doug [Sackville]; Zurbrigg,Eleanor [NCR]; Roberts,Elizabeth [NCR]; George Finney ; Henry Murkin ; Ian Davidson; Jack Dubois; John Lounds ; McAloney,Keith [Sackville]; Cash,Kevin [NCR]; Len Ugarenko; Saigeon, Lyle ENV; Mike Sullivan; NAWMP [NCR]; Mclean,Robert [NCR]; Wright,Steven [PYR]; Poter,Virginia [NCR]; Collins,Brigitte [NCR]; Dupuis,Britt [NCR]; David Hintz; Dean Smith; Dixon,Deanna [Edm]; Roberts,Elizabeth [NCR]; Donaldson,Garry [NCR]; Kathryn Folkl ; Lee Roy; Linda Stephenson; Gilbride,Neill [NCR]; Paris,Bruno [NCR]; Pat Kehoe; Edwards,Patricia [Sackville]; Wren,Sarah [NCR]; Sargent,Tasha [PYR]; Tim Sopuck ; Turner,Tony [NCR]; Van Havre,Basile [NCR]; Ingstrup,David [Edm]; Bliss,Doug [Sackville]; Reed,Eric [NCR]; Ian Barnett; Michael G. Anderson; Randy Milton  
**Cc:** Agatha Negrych; Tipple, Amanda ENV; Rugamba,Augustin [NCR]; Bob Alexander; Brenda Theriault; Liang,Catherine [NCR]; Catherine Poussart; Scott,Christine [Edm]; Sanscartier,Diane [NCR]; Harlley,Ethel [NCR]; Milord,Farah [NCR]; Lavallee,Francine [NCR]; Ingrid Bolbecher; Jan Coulombe; Jill MacDonald; Lisa Ley; Wallace,Lori [PYR]; Wheaton,Lorraine [Sackville]; Marlene Breland; Stiles,Michelle [Sackville]; Michelle Turner; Adams,Mona [Edm]; LeBlanc,Odette [Sackville]; Gilliland,Scott [St. John's]; Bucknell,Shelagh [PYR]; Schmidt, Stefanie ENV; Sue Robertson; Victoria O'Toole ; Valence,Max [Montreal]  
**Subject:** NAWMP Draft Revision Document. Comment Period

Good Afternoon.

In case you are not already aware, comments are now being accepted on the North American Waterfowl Management Plan draft revision document. To acquire the draft revision document or for instruction on how to provide comments please refer to: <http://www.nawmprevision.org/>.

The comment period extend from August 25, 2011 to September 26, 2011.

Best regards.

**Neill Gilbride**

Wetlands Office  
Canadian Wildlife Service  
Environment Canada  
351 St-Joseph Blvd, 7th floor  
Gatineau (Québec) K1A 0H3  
[neill.gilbride@ec.gc.ca](mailto:neill.gilbride@ec.gc.ca)  
Telephone 819-934-6036  
Fax 819-934-6017  
Government of Canada  
Web Site [www.ec.gc.ca](http://www.ec.gc.ca)

**Neill Gilbride**

Bureau des terres humides  
Service canadien de la faune  
Environnement Canada  
351, boul. St-Joseph, 7e étage  
Gatineau (Québec) K1A 0H3  
[neill.gilbride@ec.gc.ca](mailto:neill.gilbride@ec.gc.ca)  
Téléphone 819-934-6036  
Télécopieur 819-934-6017  
Gouvernement du Canada  
Site Web [www.ec.gc.ca](http://www.ec.gc.ca)

**SIERRA CLUB \* DEFENDERS OF WILDLIFE \* THE WILDERNESS SOCIETY \* WILDLANDS NETWORK**

U.S. Fish and Wildlife Service  
Division of Bird Habitat Conservation  
4401 North Fairfax Drive  
MS 4075  
Arlington, VA 22203

**ATTN: NAWMP Revision Comments**

September 26, 2011

To Whom It May Concern:

Thank you for this opportunity to comment on the Draft North American Waterfowl Management Plan 2012 (NAWMP.) Our organizations represent over two million Americans interested in bird watching, waterfowl hunting and natural resources conservation. Our combined membership mirrors the broad swath of constituencies the plan seeks to engage in waterfowl management. Please accept these comments into the public record on this matter.

As one of the few continental scale conservation plans in North America we feel this update represents an excellent vehicle to help implement the already adopted U.S. Fish and Wildlife Service (FWS) *Climate Change Strategic Plan* and the *National Fish, Wildlife and Plants Adaptation Strategy*, currently in development. It will also support climate adaptation programs in partner nations along with those of nongovernmental organizations.

So that the NAWMP may effectively coordinate with these plans and programs while adding to the international knowledge base on needs, gaps and best practices in climate change adaptation, we feel the FWS should integrate the following elements into the final planning document.

**A Stated Goal of Resiliency of Wetlands and Related Habitats**

Improving the resiliency of wetlands and related habitats to climate change and other stresses is essential for meeting the draft plan's stated goal of providing "[A]bundant and *resilient* waterfowl populations to support hunting and other uses . . ." (emphasis added.) Improved resiliency of habitats utilized by waterfowl for feeding, nesting and other life cycle activities should be a stated goal of the final plan. We suggest editing to the second goal identified in the draft to read as follows

- Wetlands and related habitats sufficient **and resilient** enough to sustain waterfowl populations at desired levels, while providing places to recreate and ecological services that benefit society.

### **Formation of a Climate Adaptation Workgroup**

The plan should identify a need to develop a Climate Adaptation Workgroup to inform Goals One and Two of the Plan.

### **Recognition of Climate Change Adaptation In the Principles of the North American Waterfowl Management Plan**

North American waterfowl populations and the quality of the habitat they depend on are, and will continue to be, influenced by global climate change driven, in part, by human activities outside of North America. Recognizing these externalities and the need to help resources adapt to resulting habitat conditions should be a principle of the NAWMP. We suggest the following language

- Managing waterfowl and the habitat they rely on to enable them to adapt to the impacts of global climate change is essential to fulfilling the goals of this plan and waterfowl conservation in general.

### **Promotion and Integration of Climate Change Vulnerability Assessments**

We ask that the plan should explicitly identify the need for, and promote the completion of climate change vulnerability assessments at both the flyway and joint venture levels.

Conducting assessments within the context of a changing climate and analyzing vulnerabilities to the same is an increasingly accepted practice in natural resource conservation (e.g., Johnson, et. al.) As pointed out in *Scanning the Conservation Horizon: A Guide to Climate Vulnerability Assessment* (Glick et al. 2011), a document the FWS is party to, conducting assessments within the context of multiple, likely climate scenarios will serve to make plans more relevant, help in setting management and planning priorities, assist in informing and crafting adaptive management programs and adaptation management practices and enable more efficient allocation of scarce resources. They can also aid in the development of recommendations for improving the effectiveness and efficiency of waterfowl and habitat management activities. Ultimately they will help to answer the question of whether or not we are doing the right things in the right places.

We recognize that conducting these kinds of assessments requires a significant amount of work but also recognize that the workload can decrease with the support of partners in Landscape Conservation Cooperatives and the USGS Regional Climate Change Science Centers. By promoting the use of these assessments in the plan and integrating them into waterfowl management, they will play a crucial role in identifying important information needs and driving research in their direction.

### **Strengthened Commitment to Adaptive Management**

North American waterfowl management is a model for adaptive management of natural resources. Building on this past success, future management should build climate change into the adaptive management processes already in place, and ensure that adaptive management is built into all aspects of waterfowl and waterfowl habitat management. For example, as climate patterns shift, current prairie pothole conservation projects may lose their importance or effectiveness and new geographic areas may become more important for waterfowl production. The NAWMP must design systems that can detect these changes and adapt to them.

Thank you again for this opportunity to comment on the draft planning document. We look forward to working with the U.S. Fish and Wildlife Service to achieve its finalization and implementation.

Respectfully Submitted,

Catherine E. Semcer  
Senior Washington, DC Representative  
Sierra Club

Noah Mattson  
Vice President for Climate Change and Natural Resources Adaptation  
Defenders of Wildlife

David Moulton  
Director, Climate Policy and Conservation Funding  
The Wilderness Society

Kenyon Fields  
Strategy Director  
Wildlands Network



## REFERENCES

Glick, P., B.A. Stein, and N.A. Edelson, editors. 2011. *Scanning the Conservation Horizon: A Guide to Climate Change Vulnerability Assessment*. National Wildlife Federation, Washington, D.C.

Johnson, W.C., Millet, B.V., Gilmanov, T., Voldseth, R.A., Guntenspergen, G.R., and D.E., Nagule. 2005. Vulnerability of Northern Prairie Wetlands to Climate Change. *BioScience* 55(10): 863-871.

**From:** Terry\_Rich@fws.gov  
**Sent:** Monday, September 26, 2011 2:10 PM  
**To:** info@nawmprevision.org  
**Subject:** Comments on Update  
**Attachments:** NAWMP Revision 2011 - comments by TD Rich.doc

Attached are my personal comments on the NAWMP update. If I had been aware of this sooner, I would have obtained a comprehensive review by Partners in Flight.

Thanks,

~~~~~  
Terrell D. Rich  
Partners in Flight National Coordinator  
U.S. Fish and Wildlife Service  
1387 S. Vinnell Way  
Boise, ID 83709 USA  
208-378-5347  
208-378-5262 fax  
[terry\\_rich@fws.gov](mailto:terry_rich@fws.gov)

~~~~~  
Next National PIF Committee Meetings  
11-15 March 2012 - Atlanta, Georgia

~~~~~  
[www.PartnersInFlight.org](http://www.PartnersInFlight.org)  
[www.SavingOurSharedBirds.org](http://www.SavingOurSharedBirds.org)  
[www.stateofthebirds.org/](http://www.stateofthebirds.org/)

~~~~~  
The curious are always in some danger. If you are curious,  
you might never come home. - Jeannette Winterston

*(See attached file: NAWMP Revision 2011 - comments by TD Rich.doc)*

Comments on NAWMP Revision  
26 September 2011  
Terry Rich

Page

2,8 Given the tens of millions of birders in the US alone, it's puzzling that Goal 3 does not speak clearly to them. "...other conservationists, and citizens..." doesn't do it. In fact, "citizens" is too general to be useful.

14 "Citizens-at-large" is a very odd term. Try "birders."

14 Perhaps this should be called the Waterfowl Hunter Restoration Plan. The focus on hunters may be hurting the larger cause of wetland conservation. We need to figure out how to get the non-consumptive segment of society to contribute much more.

14 I would add a clear objective here to put dollar values on "ecological services" through new research. We all need these values to be quantified. They are essential when debating with others who have only economics on their minds. You make the point at the top of p. 26. Might want to move that earlier in the document.

23 The Human Dimensions Working Group should have very strong participation by the birding community, e.g., National Audubon Society, American Bird conservancy, Cornell Lab of Ornithology, American Birding Association, and Partners in Flight.

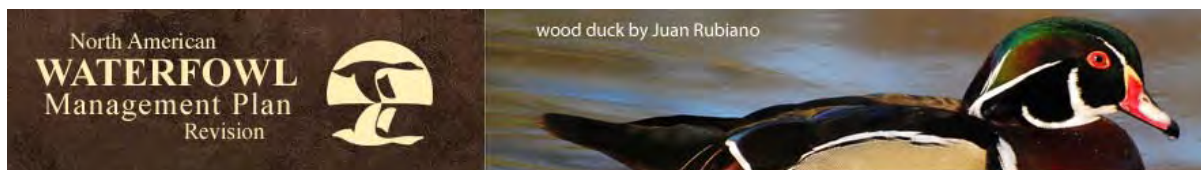
24 The PC should add at least one member from the birding community. See previous.

General Comments –

The new Tri-Initiative Science Team will be a good place to discuss research and monitoring issues that go beyond waterfowl to include other wetland-associated bird species. The NAWMP revision should acknowledge the value and potential of this team.

It's curious that there is no mention of the North American Bird Conservation Initiative, which should be a key body to help with several of the problems you have identified. NAWMP has been the leader and helped the rest of us since 1986. Now, perhaps the rest of us can pay a little back.

Similarly, when you look at the list of acronyms on p.28, one sees a fairly narrow list. There are many other partners out there who can give more to waterfowl and wetland conservation.

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## Submission #26

Ginny Wallace

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Form: [Comment on the North American Waterfowl Management Plan Revision Document August 25 through September 26](#)

Submitted by Anonymous

Tuesday, August 30, 2011

209.115.177.26

**Name (optional):**

**Organization (optional):**

**Email (optional):**

### 1. The greatest challenges facing waterfowl management in the next decade:

I think instability in the world economy may be the greatest challenge over the next decade. When the world markets are unstable, the majority of people concentrate on their immediate world which in most cases does not involve waterfowl. Garnering support for waterfowl management will be very difficult if the current market trends continue. The second challenge may be global warming, especially if the expected effects of it speed up. Waterfowl management may be surpassed by support measures concentrated on more endangered, higher profile species or habitats.

### 2. The appropriateness and relative importance of the three goals:

The three goals are appropriate for the revised vision of the plan. I believe that the third goal as listed (Growing numbers of waterfowl hunters, other conservationists, and citizens who enjoy and actively support waterfowl and wetlands conservation.) is the most important. Waterfowl hunters cannot sustain waterfowl management. Waterfowl and wetland conservation has to hit the radar with the general public to the point that they actually care. There are so many competing issues to care about that it may be very difficult to gain this support, but it is imperative or the vision will not be realized.

### 3. The most important, measurable objectives that would serve to accomplish the stated goals, and how to develop these:

Goal 1: Abundant and resilient waterfowl populations to support hunting and other uses without imperiling habitat.

Objectives - stable waterfowl populations - Continue Waterfowl Breeding Population and Habitat Survey annually or if not possible at least bi-annually and ensure that populations as a whole and individual species counts are evaluated.

Goal 2: Wetlands and related habitats sufficient to sustain waterfowl populations at desired levels, while providing places to recreate and ecological services that benefit society.

Objective. No net loss policy in place and enforced continent wide - implement this through the proposed integrated waterfowl management system.

Goal 3: Growing numbers of waterfowl hunters, other conservationists, and citizens who enjoy and actively support waterfowl and wetlands conservation.

Objective. A measurable increase in waterfowl hunter numbers within 5 years (% growth would have to be determined) - accomplish through hunter recruitment focusing on human dimension aspect - make being a hunter socially acceptable; create a hunting community that doesn't all wear plaid or camo; reduce the rabid hunter image and promote waterfowl hunting as an integral component of organic, local food.

Increase citizen donation towards wetland focused Ecological Goods and Services programs (% increase would have to be determined) - through promotion of EGS programs linking urbanites with rural duck producing wetlands.

### 4. The nature of useful objectives related to recruiting and retaining waterfowl hunters:

See above - change the hunting image. Quit thinking all hunters are "like me". Examine what a non-typical hunter needs to see him/herself as a hunter. What is the psychological driver that would make the new hunter form an identity for themselves as a hunter. Once they form that identity, help them to make the decision to hunt by making hunting easy, accessible and non-intimidating (mentor doesn't show up all decked out in camo with a truckload of decoys, determined to limit out).

**5. The means to engage a broader constituency (i.e., beyond hunters) in the cause of waterfowl conservation:**

Co-ordinate, integrate and then promote EGS programs to the general public and industry. Use industry involvement in EGS programs in media as publicity for industry and as a way of getting the message of waterfowl conservation out to the general public.

**6. The concept of integrated waterfowl management and the greatest challenges/benefits likely associated with integration:**

This is a great concept. The benefits are endless and the imagination and creativity that should come from all of the various organizations with an integrated system should produce fantastic results. I think one of the greatest challenges will be having everyone park their own and organization egos at the door and approach the development of the integrated waterfowl management in a truly collaborative way. Time is of the essence. Spend very little time designing the ultimate integrated system and spend much more time on the goals - identify the roadblocks and use everyone's knowledge and skills to reach the goals.

**7. Strategies that would make waterfowl management more efficient, effective and responsive:**

Collaborative integrated management. Data sharing. Directly involving landowners/producers in management programs - don't try and tell producers what to do, let them tell you what they can do and what will work for their business. Accept that fact.

**8. The necessity of changing or adapting our current institutions in order to implement the new NAWMP and the nature of the changes that may be warranted:**

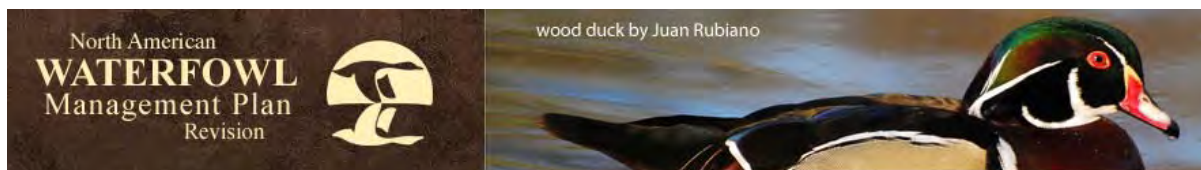
See above landowner/producer comment and hunter image comments. The world has changed and while there is room for the avid waterfowl hunter, we must make room for and encourage the casual hunter, the curious hunter, the 30-something first time hunter.

**9. The sufficiency of proposed recommendations and action steps to move this plan forward:**

The proposed recommendations and action steps should move this plan forward. Just don't get caught up in details especially around developing an integrating waterfowl management system. Use imagination when developing sound science.

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## Submission #27

Ginny Wallace

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Wednesday, September 7, 2011  
204.244.154.133**Name (optional):**

Bob Jamieson- Exec. Director CWSP

**Organization (optional):**

Columbia Wetlands Stewardship Partners

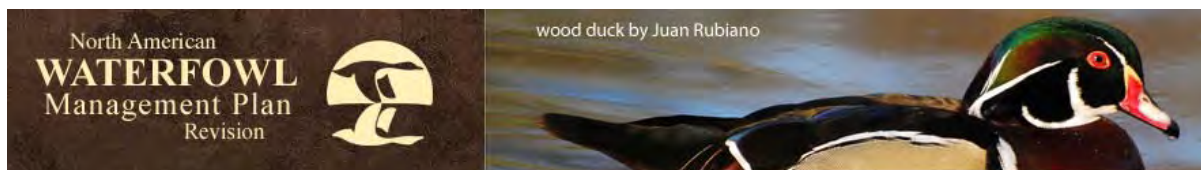
**Email (optional):**

bjamieson@cintek.com

1. The greatest challenges facing waterfowl management in the next decade:
2. The appropriateness and relative importance of the three goals:
3. The most important, measurable objectives that would serve to accomplish the stated goals, and how to develop these:
4. The nature of useful objectives related to recruiting and retaining waterfowl hunters:
5. The means to engage a broader constituency (i.e., beyond hunters) in the cause of waterfowl conservation:  
Our group has engaged the entire community in our valley in wetland conservation (the Upper Columbia River valley in eastern BC). We have representatives from all the town councils, regional districts, NGOs, agencies and industrial users, working together to manage a very large wetland complex (180 km long) and RAMSAR site. I can send more info if you are interested. Our website is simple but it includes a list of the members. [www.columbiawetlands.org](http://www.columbiawetlands.org)
6. The concept of integrated waterfowl management and the greatest challenges/benefits likely associated with integration:  
Our group may be a good model for other areas. Our biggest problem is that because we are outside the typical models for doing conservation, we have major problems in finding funding for running the organization.
7. Strategies that would make waterfowl management more efficient, effective and responsive:
8. The necessity of changing or adapting our current institutions in order to implement the new NAWMP and the nature of the changes that may be warranted:  
Most of the Columbia Wetlands is provincial crown land. Your document essentially ignores the provincial role in habitat management and wetland management.  
  
One of our strategies is to manage the Columbia Wetlands as a system, irrespective of ownership, be it federal, provincial or private/
9. The sufficiency of proposed recommendations and action steps to move this plan forward:  
It would be most useful for us if there was some mechanism with the agreement to provide support for wide-based groups, like ours that are stewarding wetland systems.

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## Submission #28

Ginny Wallace

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Thursday, September 15, 2011  
71.183.96.46**Name (optional):**

Caroline Brady

**Organization (optional):**

California Waterfowl Association

**Email (optional):**

Carolinembrady@gmail.com

**1. The greatest challenges facing waterfowl management in the next decade:**

I think one of the greatest challenges facing waterfowl management in the next decade will be the human dimension aspect of the plan. Many of us in the waterfowl community are well versed in collecting, analyzing and reporting on waterfowl data, but when it comes to reaching out to new possible waterfowl and wetland supporters things get a little tricky. I believe that women need to be involved in order to increase overall hunter participation, simply because if a child is being raised in a single parent home (likely by the mother) then they are more likely to miss out on hunting opportunities or even igniting the interest of it all. Beautiful things happen early in the morning in a marsh that every kid should experience at least once! If we can get women (and thereby today's youth) involved I strongly feel the upcoming generation will at the least be a little more exposed to waterfowl, wetlands and the outdoors.

**2. The appropriateness and relative importance of the three goals:**

I think the three goals are very appropriate, are well integrated and supportive of each other. In order to accomplish the goals, all three need to be met - they build on each other nicely.

**3. The most important, measurable objectives that would serve to accomplish the stated goals, and how to develop these:****4. The nature of useful objectives related to recruiting and retaining waterfowl hunters:**

We need to confront the changing social landscape, and a HDWG will be crucial in accomplishing this goal, but the revision doesn't go into much more detail other than that a HDWG is needed and that assessments need to be made as how regulations affect participation.

**5. The means to engage a broader constituency (i.e., beyond hunters) in the cause of waterfowl conservation:**

Same as #4

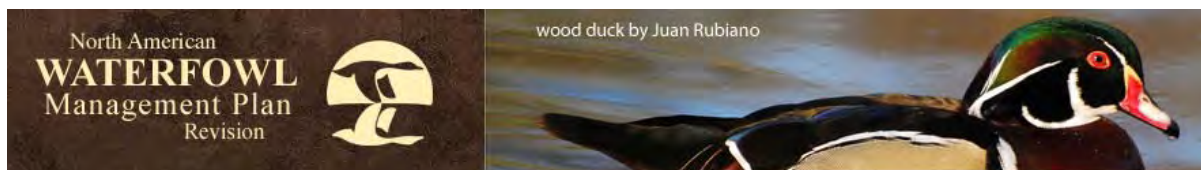
**6. The concept of integrated waterfowl management and the greatest challenges/benefits likely associated with integration:**

Communication will be crucial for this. If everyone starts out on the same page - and reassess what their management goals are then we can work together to achieve those goals. I agree with the plan that an integrated plan will work if we are all working towards a common goal.

**7. Strategies that would make waterfowl management more efficient, effective and responsive:****8. The necessity of changing or adapting our current institutions in order to implement the new NAWMP and the nature of the changes that may be warranted:****9. The sufficiency of proposed recommendations and action steps to move this plan forward:**

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## Submission #34

Ginny Wallace

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[Submission information](#)Form: [Comment on the North American Waterfowl Management Plan Revision Document August 25 through September 26](#)Submitted by Anonymous  
Tuesday, September 27, 2011  
12.151.208.146**Name (optional):**

Keith McKnight

**Organization (optional):**

Lower Mississippi Valley Joint Venture / USFWS

**Email (optional):**

steven\_mcknight@fws.gov

**1. The greatest challenges facing waterfowl management in the next decade:**

Ever-increasing pressure on water quantity, and conversion of wetland & grassland habitats important to waterfowl

**2. The appropriateness and relative importance of the three goals:**

The three goals are all relevant. As pointed out by the Draft Plan, they are interdependent. However, the appropriate balance of resources expended on behalf of harvest regulation, habitat conservation, and human dimensions - particularly in the near and medium term - will not constitute an even split. Habitat conservation remains the single greatest priority of waterfowl management. I would suggest that the balance of coverage of these aspects in the Draft Plan be adjusted to communicate the imperative of population, hence habitat, conservation as waterfowl conservationists press on in the near term. As a simple example, Appendix B is not referenced in the body of the Draft Plan! The path to integration will be complex, and deserves careful coverage in the Draft Plan, but population and habitat objectives must not be discarded (or downgraded) in the process.

**3. The most important, measurable objectives that would serve to accomplish the stated goals, and how to develop these:****4. The nature of useful objectives related to recruiting and retaining waterfowl hunters:****5. The means to engage a broader constituency (i.e., beyond hunters) in the cause of waterfowl conservation:****6. The concept of integrated waterfowl management and the greatest challenges/benefits likely associated with integration:**

The concept of integrated waterfowl management is sound and logical. The great benefit of this approach is in forcing waterfowl conservationists to directly consider and quantify the interdependencies among population management, habitat conservation, and constituent attitudes/behavior. The two greatest challenges are (1) disrupting long-held structures & ways of doing things, and (2) amassing a critical volume of human dimensions information in such a way that it can be linked effectively with (and inform) the other two disciplines.

**7. Strategies that would make waterfowl management more efficient, effective and responsive:****8. The necessity of changing or adapting our current institutions in order to implement the new NAWMP and the nature of the changes that may be warranted:****9. The sufficiency of proposed recommendations and action steps to move this plan forward:**

One of the challenges in evaluating the Draft Plan is in not being able to also evaluate the Action Plan...which presumably has/will have more concrete action steps/options outlined.

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## WYOMING GAME AND FISH DEPARTMENT

5400 Bishop Blvd. Cheyenne, WY 82006

Phone: (307) 777-4600 Fax: (307) 777-4699

Web site: <http://gf.state.wy.us>

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CHARLES PRICE

September 21, 2011

WER 12405

U. S. Fish and Wildlife Service

Division of Bird Habitat Conservation

Draft North American Waterfowl Management Plan Revision

Mr. Mike J. Johnson, Chief

U.S. Fish and Wildlife Service

Division of Bird Habitat Conservation

Attn: Draft NAWMP Revision

4401 N. Fairfax Drive MS4075

Arlington, VA 22203

Dear Mr. Johnson:

The staff of the Wyoming Game and Fish Department appreciates the opportunity to review and comment on the draft of the North American Waterfowl Management Plan (NAWMP) Revision. We are in general agreement with the draft comments being prepared and submitted by the Pacific and Central Flyways other than where our comments differ or address issues not covered by the flyway comments. We also reviewed the Atlantic Flyway Council's draft comments and generally concur.

The Department supports the plan's three fundamental goals which are: [paraphrased] abundant and resilient waterfowl populations; habitats sufficient to sustain desired waterfowl populations; and a broader constituency to support waterfowl conservation.

The draft NAWMP revision is written in a highly conceptual frame that advocates a significant paradigm shift to an integrated system of waterfowl management linking waterfowl populations, habitat, and human dimensions. The plan also advocates development of "an inter-related set of decision models that managers can use to efficiently allocate resources to achieve the objectives..." Implementation details deferred to a "companion action plan," which is yet to be developed. In contrast to prior NAWMP documents, the current draft plan is effectively a plan to develop a plan (more like an essay). Consequently, we are unable to review the technical competency of this plan or its likelihood of accomplishing stated goals. We suggest the "Vision for Integrated Management" document be substantially condensed (it contains a great deal of redundancy) and used as an introduction to the "companion plan," which should become the next NAWMP revision.

In today's reality of dwindling resources and changing cultural and socio-political values, the ideal of allocating resources strategically ("strategic conservation") is drawing increased attention from many sectors. As well, the research community increasingly promotes modeling as a solution to remove subjectivity from decision making and even as surrogate documentation to support management recommendations. However we are compelled to interject some cautionary points. Models are an abstraction of reality based on simplifying assumptions and available data. Resource allocation models in particular serve to institutionalize and implement specific sets of human values based on community consensus. Therefore, models cannot be viewed as completely unbiased. Ironically, one of the most dangerous limitations of models is that important considerations outside the scope of the model or assumptions that may not hold true in every case are unable to be addressed through cognitive input, often even in an "adaptive framework." Furthermore, it is unclear how the proposed decision process will effectively link or integrate habitat, population, and social models that of necessity operate on highly dissimilar currencies. If it is possible to construct meaningful and useful models, these need to be developed beforehand and reviewed by the professional community prior to their endorsement as a management approach in the NAWMP or a "companion action plan."

The environmental factors that limit waterfowl populations continue to be vigorously debated among researchers and managers. The prevailing wisdom is that waterfowl populations (ducks in particular) are primarily limited by availability of wetlands and suitable nesting cover within their breeding ranges. However, winter habitat and food availability, migration staging areas, pre-nesting habitat, predation, sub-lethal environmental contamination, disease, harvest, and other factors are also cited as possible limiting factors. Our knowledge of the interrelationships among these factors is largely hypothetical and even conjectural. (How can models effectively accommodate this multifaceted array of incongruent theories? What is reality?). Moreover, waterfowl in general are adaptable, mobile, and readily pioneer into new habitats or adjust their distribution in response to habitats that are in a continual state of environmental flux. There are many case studies to illustrate this adaptability. For example, a large and diverse assemblage of breeding waterfowl and other wetland dependent birds have pioneered into an isolated complex of wetlands built in the arid Red Desert of south central Wyoming some considerable distance from other bird concentrations. This site is now classified as an Audubon Important Bird Area with over 110 avian species, mostly wetland and riparian obligates, have been documented. [<http://iba.audubon.org/iba/profileReport.do?siteId=2608>].

If the new decision system is constrained by focusing major wetland projects in "areas of continental significance" and if project selections are based on rigid modeling criteria, we will lose many viable opportunities and we will not necessarily be doing "strategic conservation." Several additional considerations that need to be factored into the selection process for the types and locations of projects are:

- Public access and recreation potential



- This consideration is made in light of the plan's expanded scope to address human dimensions, recruitment and retention, and the need to broaden support for wetlands conservation. For example locating some projects close to urbanized settings and including access, educational and interpretive facilities will be an effective strategy to increase public support for wetlands conservation. It will also be critical to incorporate access agreements for traditional recreational uses (hunting) at many projects, or at least include a scoring advantage for projects that include public access. This factor alone will determine the optimum locations for many projects.

Project opportunities

- Physical opportunity (landscape, infrastructure, hydrology, etc.)
- Local/regional partner interest and support
- Match funding availability
- Long term stewardship arrangements
- Land values / real estate costs (i.e., getting the most for the dollar spent)

Project quality

- Project size and design, quality of the habitat protected
- Adjacent habitat considerations
- Current threats and future risk of impairment
- Anticipated use by wildlife

The Department supports (in concept) the emphasis on development of an integrated system. An integrated system could make waterfowl management more effective in fulfilling the purpose of the plan. Some of the greatest challenges might be institutional change. For example, although we are not certain of its form, additional changes in the Flyway system may be required. Such changes may involve increased emphasis on habitat or strategies to encourage support for habitat work. Another challenge will be incorporating climatic variation into any carrying capacity/population status equation. A major benefit of integration would be focus placed on the other 2 legs of the 3-legged stool. However, we are not sure the method being proposed to achieve this integrated management system is the most appropriate or effective. As an alternative, we suggest developing an enhanced continental habitat plan and regional step-down plans as discussed below (see recommendations in comment 3).

Our specific comments follow:

- 1) We are deeply concerned that some important wetland areas of Wyoming are excluded from the NAWMP "Areas of Continental Significance" map that has been proposed (see attached draft map). Since the inception of NAWCA, Wyoming has been at a major disadvantage in competing with other states to secure large NAWCA grants because the four continental bird initiatives fail to recognize the important habitat areas of our state. As a result, the maximum potential score for projects in Wyoming is heavily penalized. This oversight is due in large part to a simple lack of data and information. The proposed NAWMP map shows extreme

Mr. Mike J. Johnson  
September 21, 2011  
Page 4 - WER 12405

Northwest Wyoming within a continentally significant area (Area 21) that corresponds to the range of the Tri-state flock of the Rocky Mountain Population of Trumpeter Swans, which appears to be the principal basis for the area's inclusion. The Wyoming portion of Area 21 is predominantly national park and designated wilderness where wetlands already receive a high degree of protection and there is limited project potential. From a waterfowl perspective, several other locations in Wyoming are far more important.

In particular, the continental map abruptly cuts off the "Sandhills and Platte River" area (Area 5) at the Wyoming/Nebraska state line. This is the only instance in which a political boundary (straight line) is used to delineate an arbitrary boundary of an important waterfowl area. The habitat on the Wyoming side is at least as important as that on the immediate Nebraska side. Goshen Hole in southern Goshen CO is a high priority wetlands complex identified in the Wyoming Wetlands Conservation Strategy

[\[http://gf.state.wy.us/habitat/WetlandConservation/Wyoming%20Wetlands%20Conservation%20Strategy%20September%207,%202010.pdf\]](http://gf.state.wy.us/habitat/WetlandConservation/Wyoming%20Wetlands%20Conservation%20Strategy%20September%207,%202010.pdf)

and the Wyoming State Wildlife Action Plan

[\[http://gf.state.wy.us/downloads/pdf/swap/2010\\_SWAP\\_Complete.pdf\]](http://gf.state.wy.us/downloads/pdf/swap/2010_SWAP_Complete.pdf) (see attached map).

Goshen Hole is a very important spring and fall staging area for ducks and geese and supports one of the State's highest duck breeding pair densities. Nearly the entire Hi-line Population of Canada geese migrates through this portion of Wyoming each spring and fall, and over 100,000 lesser snow geese stage there in the spring. Moreover, the Goshen Complex is connected to, and a continuation of the Sandhills/North Platte area and we see no legitimate rationale why Area 5 should not extend across the Wyoming state line to include it. A copy of the Goshen Regional Wetlands Conservation Plan is attached for your consideration.

The Laramie Plains Wetlands Complex, which includes several satellite refuges of the Arapaho National Wildlife Refuge, is an exceptionally important spring staging area for several thousand redheads, canvasbacks, scaup and other duck and shorebird species (contact Ann Timberman, Refuge Manager). Significant redhead nesting occurs there and a portion of the complex supports our highest duck breeding pair density. The Bear River Complex in SW Wyoming is also an important migration, staging and production area connected to the Bear River corridor through WY, ID and Utah, all of which needs to be recognized on the NAWMP continental map. Cokeville Meadows NWR is in the acquisition stage in the WY portion of the Bear River (contact Carl Millegan, Refuge Manager). The Bear River corridor is migration habitat used by significant portions of the continental populations of American avocet, black-necked stilt, marbled godwit, white-faced ibis, tundra swan, and several other species. Cokeville Meadows is also an important redhead nesting area in Wyoming.

The trumpeter swan range expansion area in the Upper Green River Wetlands Complex is not recognized. Not only does the Upper Green support a self-sustaining population of breeding



swans, it is also a significant waterfowl production area and migration corridor through arid regions of Wyoming. Finally, the Wind River Basin in Central Wyoming should be considered. This area provides essential migration habitat, and is used as a pre-nesting staging area for ring-necked ducks and scaup that nest in boreal forest lakes after the snow recedes from higher elevations and at more northerly latitudes (contact Mark Hogan USFWS/PFW, Lander).

A map depicting these important wetlands complexes is attached to this comment letter.

- 2) On pages 13-14 the plan states: "In 1986, it was generally assumed that the loss of habitat was largely responsible for the decline in waterfowl populations, and that associated conservative hunting regulations and reduced bird abundance triggered the reduction in waterfowl hunters ... Alternative hypotheses for hunter decline included increased regulatory complexity and reduced public access to hunting areas. Unfortunately, the management community did not undertake social science research to inform these hypotheses, despite a growing concern over declining duck stamp sales and loss of revenue used to fund waterfowl habitat conservation."

The last sentence is inaccurate. We recommend the authors consult the following study and use its results:

Responsive Management/NSSF [National Shooting Sports Foundation]. 2008. The Future of Hunting and the Shooting Sports; research-based recruitment and retention strategies. Produced for the U.S. Fish and Wildlife Service under Grant Agreement CT-M-6-0. Harrisonburg, VA. 261pp.  
[\[http://www.dnr.state.il.us/NRAB/children/Future\\_hunting.pdf\]](http://www.dnr.state.il.us/NRAB/children/Future_hunting.pdf).

While the above study is not specific to waterfowl hunting, its results are broadly applicable and comprise the best available information.

The top reasons active hunters cited as causes of dissatisfaction were (Page 56):

- 1) Not enough places to hunt (26%)
- 2) Not enough access (23%)
- 3) Work obligations (21%)
- 4) Amount of free time (17%)
- 5) Pollution or litter (15%)
- 6) Poor behavior of other hunters (14%)

The top reasons cited by hunters for the decline in hunting were (Page 53):

- 1) Poor health / age (42%)
- 2) No time: family or work obligations (32%)

- 3) Lack of access, nowhere to hunt (16%)
- 4) Not enough game (6%)
- 5) Did not want to go (4%)
- 6) Complicated regulations (3%)

The plan notes that in spite of current high waterfowl populations and good wetland conditions, the number of U.S. waterfowl hunters continues to decline (pages 2, 3). The plan then advocates that healthy waterfowl populations and wetlands are needed to sustain hunters and other supporters, which suggests habitat conservation will be the plan's focus to address hunter and supporter recruitment. However, rebuilding a culture that values wetlands and that supports wetland conservation will be inexorably tied to the ability of people to access and enjoy the resource. Access to hunting lands where there is a good chance of harvesting game is also critical to recruitment/retention efforts and comprises one of the potential constraints wildlife agencies are able to effectively influence. Accordingly, it is critical that public access become an essential component of future NAWCA-funded wetlands projects. Simply producing or sustaining more waterfowl through wetlands conservation is not going to reverse the decline in hunter participation. We strongly recommend the NAWMP direct that NAWCA project scoring include additional points for providing public access through an access easement or agreement, and for projects on public or state-owned lands where access is allowed. This recommendation is consistent with goal two: "Wetlands and related habitats sufficient to sustain waterfowl populations at desired levels, while providing places to recreate and ecological services that benefit society." However, the focus needs to shift from merely providing places where a privileged few may hunt, to providing physical access to places where the general populace can recreate.

Complexity of regulations was not perceived as an important constraint among active and inactive hunters, and non-hunters (Responsive Management/NSSF 2008). However, regulation complexity can be intimidating to new or inexperienced hunters or and to nonresidents attempting to hunt for the first time in another state. Therefore, efforts should also be made to avoid needlessly complex regulations.

- 3) On pages 20-27, the plan presents a synopsis of the authors' perceptions about shortcomings of the existing system and a highly conceptualized and abstract vision for an integrated system of waterfowl management. Some of the authors' statements are misleading. For example, on Page 22 the use of *ad hoc* task forces and working groups is cited as a shortcoming of the "traditional management silos." In reality, appointment of task forces is a common and effective tool used by larger governance bodies to address priority and specialized issues. The task forces and working groups identified have been effective at addressing priority issues and have provided several useful products to the flyways and USFWS.

Each flyway has developed management plans with objectives for the populations and stocks under its management. In several cases, these plans are jointly authored and maintained by two

or more flyways. The NAWMP provides continental objectives for waterfowl. All of these plans are available for consultation and reference by the entities involved with habitat work. The Joint Ventures each focus on the habitat resources within their administrative boundaries and the North American Wetlands Conservation Council has the responsibility to select from the best and most viable projects at the national level. Most state wildlife agencies are acutely aware of declining hunter participation and have begun a variety of programs to enhance hunter retention and recruitment. As noted in the Atlantic Flyway's comments, non-hunting wildlife enthusiasts have not historically been significant economic contributors. However, there is a benefit in broadening the political base of support to help maintain and expand important federal conservation programs.

After reviewing this draft NAWMP, it is our opinion what is being proposed (yet another level of organizational bureaucracy and multiple complex modeling procedures) is unnecessary, unlikely to succeed, and will be vastly more cumbersome than what is in place now. Specific areas of improvement are needed however a complete system overhaul is unwarranted and undesirable. In reality, maintaining management bodies with independent expertise in population, harvest, habitat, and human dimensions has advantages because these bodies can focus on their specific areas of specialization rather than become mired in multi-level administrative processes. That said wetlands conservation would benefit from a system promoting more effective coordination and information exchange among the specialized management disciplines. Our principal recommendations follow:

- i) Waterfowl population and harvest management programs are well developed and well-coordinated at the national level. **What is needed is an enhanced "NAWHMP" (North American Waterfowl Habitat Management Plan) to consolidate the various habitat efforts and link them to population objectives.** This plan should rely on the most advanced geospatial technologies and habitat research available. In proposing conservation priorities, we suggest the plan recognize the adaptability and capability of many waterfowl species to exploit new or alternative habitats in locations not traditionally recognized as primary habitat areas. The habitat plan should also address the need for enhanced access and recreation opportunities.
- ii) Broadening the support base by addressing hunter recruitment/retention and encouraging other publics to become involved in supporting conservation will require:
  - o Additional public access, especially near urban areas
  - o Mentors or "community conservation clubs"
  - o Outdoor skills development programs
  - o Assistance with equipment needs
  - o A substantial and expensive information and education campaign

The NAWMP can potentially address the access variable in this equation by recommending that public access be provided on many future NAWCA-funded projects and that some projects should be located near urban centers for this purpose.



- iii) The plan should address limitations imposed by the nonfederal match requirement. (Refer to issues identified in the IWJV State Conservation Partnership meeting summary, attached). Currently, competitive projects require a 3:1 nonfederal match. Many very good projects are not able to compete for NAWCA funding in rural portions of the country that are "match-challenged." This was one of the primary obstacles identified by the chairs of the IWJV Western State Conservation Partnerships. We suggest the match criteria be changed to allow use of certain federal sources such as WRP and WHIP as match in NAWCA grant applications. We recognize this may require additional legislative action. However the NAWMP should recognize the need for, and recommend more liberal rules governing match requirements at the state level.
  - iv) The plan should also address capacity issues identified as a major obstacle by the chairs of the IWJV Western State Conservation Partnerships. (Refer to issues identified in the IWJV State Conservation Partnership meeting summary, attached). This can be accomplished by allowing use of NAWCA grants to fund Wetland Project Coordinator positions whose principal responsibilities will be to identify, plan, and implement wetlands conservation projects, and coordinate with other agencies and NGOs involved in wetlands work. This may also require additional legislative action. However the NAWMP should recognize the need for additional technical services to increase capacity at the state level.
- 4) We suggest NAWMP monitoring protocol emphasize the need to obtain information to evaluate program effectiveness in addition to the need for additional or expanded broad-scale population surveys for some species. While we understand the critical need for reliable population estimates (e.g., sea ducks), expanded population surveys alone will not improve our understanding of responses to implementation of habitat programs in most Joint Ventures.
- 5) The solicitation for comments on the draft NAWMP specifically requested input on nine plan elements. These along with our responses are enumerated below:
- 1. The greatest challenges facing waterfowl management in the next decade:
    - o Need for regulatory and incentive-based protection of isolated wetlands.
    - o Adequate funding for wetlands conservation
    - o Need for sustained/increased enrollment in CRP, WRP, and other Farm Bill Conservation Programs.
    - o Waterfowl hunter recruitment and retention.
    - o Engagement of nontraditional conservation supporters.
    - o Increased capacity (technical services) to implement wetlands conservation at the state level and through Farm Bill programs.
  - 2. The appropriateness and relative importance of the three goals:
    - o The three goals are entirely appropriate, the process for achieving them needs to be rethought as outlined in our comments above.

- The primary emphasis should be placed on population and habitat goals as these are within the NAWMP sphere of influence. The NAWMP has the capability to influence recruitment/retention as a secondary goal through providing additional access.
3. The most important, measurable objectives that would serve to accomplish the stated goals, and how to develop these:
- Waterfowl hunting participation (develop objectives for this).
  - Other wetland-dependent recreation (e.g. bird watching) participation (develop objectives for this).
  - Public support for wetlands conservation (develop objectives for this, e.g., % support through surveys).
  - Waterfowl population status relative to continental goals (this is a long-standing objective and should continue).

Note: We believe efforts to measure waterfowl population response to habitat projects will be exceedingly complex and inconclusive because we have an incomplete understanding of the factors that limit waterfowl populations, even at the species level, and innumerable confounding variables (not the least of which is climate) will complicate such an analysis. Accordingly we suggest these types of analyses be done at the local project level and possibly at a regional scale, but not a national or continental scale.

4. The nature of useful objectives related to recruiting and retaining waterfowl hunters:
- Clearly such objectives would be useful and appropriate to track the success of recruitment/retention strategies.
  - Objectives would likely be based on total duck stamp sales, amount of hunting access made available.
  - Additional human dimensions surveys may be useful in helping to improve our understanding of factors affecting waterfowl hunter participation, which tends to be a somewhat more specialized type of hunting, and to understand whether retention/recruitment efforts are succeeding. However, the Responsive Management/NSSF (2008) report is the best available information at this time.
5. The means to engage a broader constituency (i.e. beyond hunters) in the cause of waterfowl conservation:
- As noted in our comments, many of the strategies required to effectively engage a broader cross section of the public are well outside the scope of the NAWMP (refer to Responsive Management/NSSF 2008). The single measure that is within the capability of NAWMP is to enhance public access for wetland-dependent recreation.
6. The concept of integrated waterfowl management and the greatest challenges/benefits likely associated with integration:
- Additional coordination is needed, especially between the population and habitat management communities. This can be accomplished in part by developing an

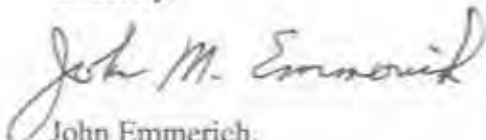
enhanced continental habitat management plan and regional "step-down" plans with active involvement from both sectors. Attempts to develop multiple "interrelated models" will be neither an effective nor efficient means to accomplish this. Refer to our comments on this topic.

7. Strategies that would make waterfowl management more efficient, effective and responsive:
  - o The existing flyway system has been, and continues to be the most effective and efficient means for population management and should remain intact. While there needs to be increased coordination with the habitat management discipline (potentially accomplished through national and regional habitat management plans), attempting to develop a complex bureaucratic system that is "everything to everybody" will ultimately fail to deliver the intended results (see our comments on this topic).
8. The necessity of changing or adapting our current institutions in order to implement the new NAWMP and the nature of the changes that may be warranted:
  - o Refer to No. 7 immediately above.
9. The sufficiency of proposed recommendations and action steps to move this plan forward:
  - o The recommendations and actions on pages 24-27 are highly conceptual in nature. As stated in our comments, the draft NAWMP does not contain sufficient detail for us to conduct a meaningful review of its technical competency. Such a review must be reserved until the "companion action plan" is produced, which should in reality become the next NAWMP.

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We thank the Plan Committee (PC) for the hard work they have put in into the revision and plan oversight in general. The Revision reemphasizes and increases the role of the PC. We have heard from a previous member of the PC that staff and a budget are lacking. We believe the PC should receive more financial and administrative support.

Sincerely,



John Emmerich,  
Deputy Director

JE/mf/gb

Attachment

cc: Robert Trost, USFWS Pacific Flyway Representative  
James Dubovsky, USFWS Central Flyway Representative  
Dave Smith, Coordinator, Intermountain West Joint Venture  
Ken Sambor, Coordinator, Northern Great Plains Joint Venture+  
Larry Roberts, WGFD Migratory Game Bird Biologist  
Joe Bohné, WGFD Staff Biologist  
Steve Tessmann, WGFD Staff Biologist



Figure XX. Shaded regions have highest relative importance to individual species or total continental waterfowl populations during the breeding, migration, and/or wintering periods. Additional areas important to waterfowl are not identified but significant at smaller scales.





Priority wetlands complexes of Wyoming. Source: Copeland et al. (2010); WY Joint Ventures Steering Committee (2010).

- Goshen Hole is part of the North Platte/Sandhills Area and needs to be included as such. It is an important migration and production area for several species of ducks and geese. Haukos et al. (2006) documented the Goshen Complex is an important spring stopover area used by pintails that winter along the Rio Grande River, New Mexico.
- The Laramie Plains is a critically important spring migration area and pre-nesting habitat for thousands of redheads, canvasbacks and scaup.
- The Bear River corridor of WY, Id, and Utah is a critical migration corridor for several waterfowl and shorebird species. The Wyoming portion is an important production area for redheads and several other species.
- The Upper Green River is an important migration corridor and trumpeter swan breeding habitat
- The Wind River Basin is an important migration corridor and pre-nesting staging area.

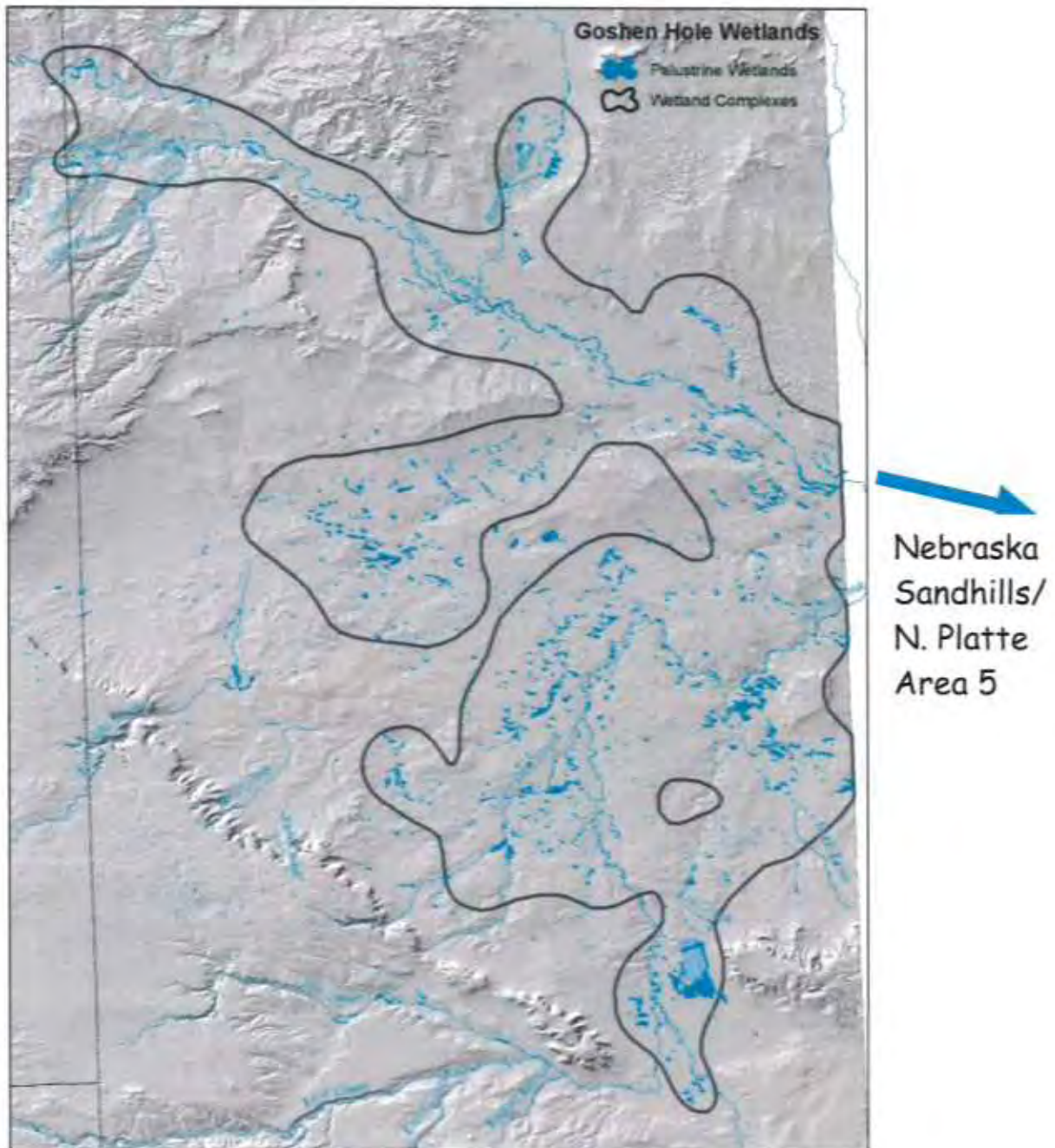
Copeland, H.E., S.A. Tessmann, E.H. Girvetz, L.D. Roberts, C. Enquist, A. Orabona, S. Patla, and J. Kiesecker. 2010. A geospatial assessment on the distribution, condition, and vulnerability of Wyoming's wetlands. *Ecological Indicators* 10(4):869-879.

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Wyoming Joint Ventures Steering Committee. 2010. Wyoming Wetlands Conservation Strategy. WY Game and Fish Department, Cheyenne. 108pp.  
<http://gf.state.wy.us/habitat/WetlandConservation/Wyoming%20Wetlands%20Conservation%20Strategy%20September%207,%202010.pdf>





Goshen Wetland Complex (Copeland et al. 2010).

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**Intermountain West Joint Venture  
State Conservation Partnership (SCP) Meeting  
Meeting Summary**

**January 18-20, 2011**

Radisson Suites Tucson Airport, 7051 South Tucson Blvd., Tucson AZ 85756, (520) 225-0800

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**Participant List:**

Arizona-John O'Dell, Edwin Juarez, Arizona Game & Fish	Dave Smith, IWJV Coordinator
California-John Ranlett, Ducks Unlimited	Ali Duvall, IWJV Assistant Coordinator
Colorado-David Klute, Colorado Division of Wildlife	Randy Gray, IWJV Farm Bill Coordinator
Idaho-Don Kemner, Idaho Department of Fish & Game	Josh Vest, IWJV Science Coordinator
Montana-Catherine Wightman, Montana Fish, Wildlife & Parks/Montana Bird Conservation Partnership	Patrick Donnelly, IWJV Geospatial Modeler
Nevada-Robin Wilson, Nevada Audubon Society	Ashley Dayer-Facilitator/Communications
Oregon-Bruce Taylor, Oregon Habitat Joint Venture	
Utah-Jason Vernon, Utah Division of Wildlife Resources	
Utah-Craig Garner, Ducks Unlimited	

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Washington-Terry  
Landowner/IWJV

Mansfield,

Private

### SWAP Implementation Coordinator

Wyoming-Steve Tessmann, Wyoming Game & Fish

**Wednesday, January 19, 2011**

#### **Welcome, Introductions & Review of Meeting Goals and Materials-Ashley Dayer**

The Intermountain West Joint Venture (IWJV) Management Board and staff view State Conservation Partnerships (formerly State Steering Committees) as essential to delivering strategic habitat conservation to support sustainable populations of birds in the Intermountain West. These work groups have in the past existed to develop state-wide bird conservation plans, review and rank habitat project and capacity grants funded by the IWJV, and help to promote IWJV habitat objectives. The purpose of this meeting is to strengthen the relationship between the IWJV Management Board, Staff, State Conservation Partnerships and broader partner network. Meeting goals include:

- 1) Discuss the role and niche of Joint Ventures with respect to state bird conservation planning and habitat conservation efforts.
- 2) Understand bird conservation needs and opportunities that exist within each state utilizing the results of the IWJV Needs and Opportunities Survey and partner exchange.
- 3) Explore emerging opportunities to implement strategic habitat conservation with the explicit link between biological planning, implementation and evaluation.
- 4) Share information and lessons learned related to science, habitat delivery, capacity-building, strategic communications and/or policy achievements.
- 5) Clarify the role, function and membership of the State Conservation Partnerships (SCPs).
- 6) Coordinate targeted activities for 2011--with a focus on enhanced communication.

Meeting preparation included review or consideration of the following:



- 1) Review the Strategic Habitat Conservation (SHC) technical handbook at <http://www.fws.gov/science/doc/SHCTechnicalHandbook.pdf>. Consider the following questions: Where do we each spend the majority of our time in the SHC framework? How about our individual agencies/organizations?
- 2) What opportunities exist for State Conservation Partnerships to further SHC?
- 3) What challenges exist for you as an SCP Chair?
- 4) How has the SCP functioned in the past? How could it function in the future to further bird conservation in the state?
- 5) Who would currently identify themselves as a member of the SCP? Who wouldn't? Who should be invited to serve on the SCP in the future? (Please bring a list of current SCP members.)
- 6) Review the DRAFT IWJV 2011-2015 Strategic Communications Plan.

#### **Setting the Stage from the IWJV Perspective-Dave Smith/Ali Duvall-Powerpoint Presentation**

- The Role & Niche of Joint Ventures in Conservation-Looking Ahead
- IWJV Goals, Partnership Network and the Question of Scale
- What SCPs Mean to the IWJV

The IWJV Management Board discussed the important role of SCPs (formerly State Steering Committees, or SSCs) at their Spring Meeting. The Management Board drafted a statement for SCP Chairs to consider, discuss and edit at this meeting: *The State Conservation Partnerships will serve as the primary conservation delivery drivers by facilitating local level habitat projects that contribute to achievement of high priority regional and continental bird objectives.*

#### **Report on the Needs & Opportunities Survey-Ali Duvall-Powerpoint Presentation**

SCP Chairs agreed that this was an important first step in surveying the needs and opportunities that exist within the partnership network. It was agreed however that it would be useful to stratify results by state to ensure responses are statistically reliable and not skewed by response rates. The question was raised about who should be included on the SCP within each state (and discussed in detail later in the meeting.)

#### **Nominal Group Exercise-Ashley Dayer & Group**

Ashley Dayer led the group through an exercise to answer the question: What opportunities exist for SCPs to serve as conservation delivery drivers? The group was then asked to rank the list from 1 to 5 in importance, with 1 being the highest score. The Top 21 Priorities can be viewed on page 4 of this summary.

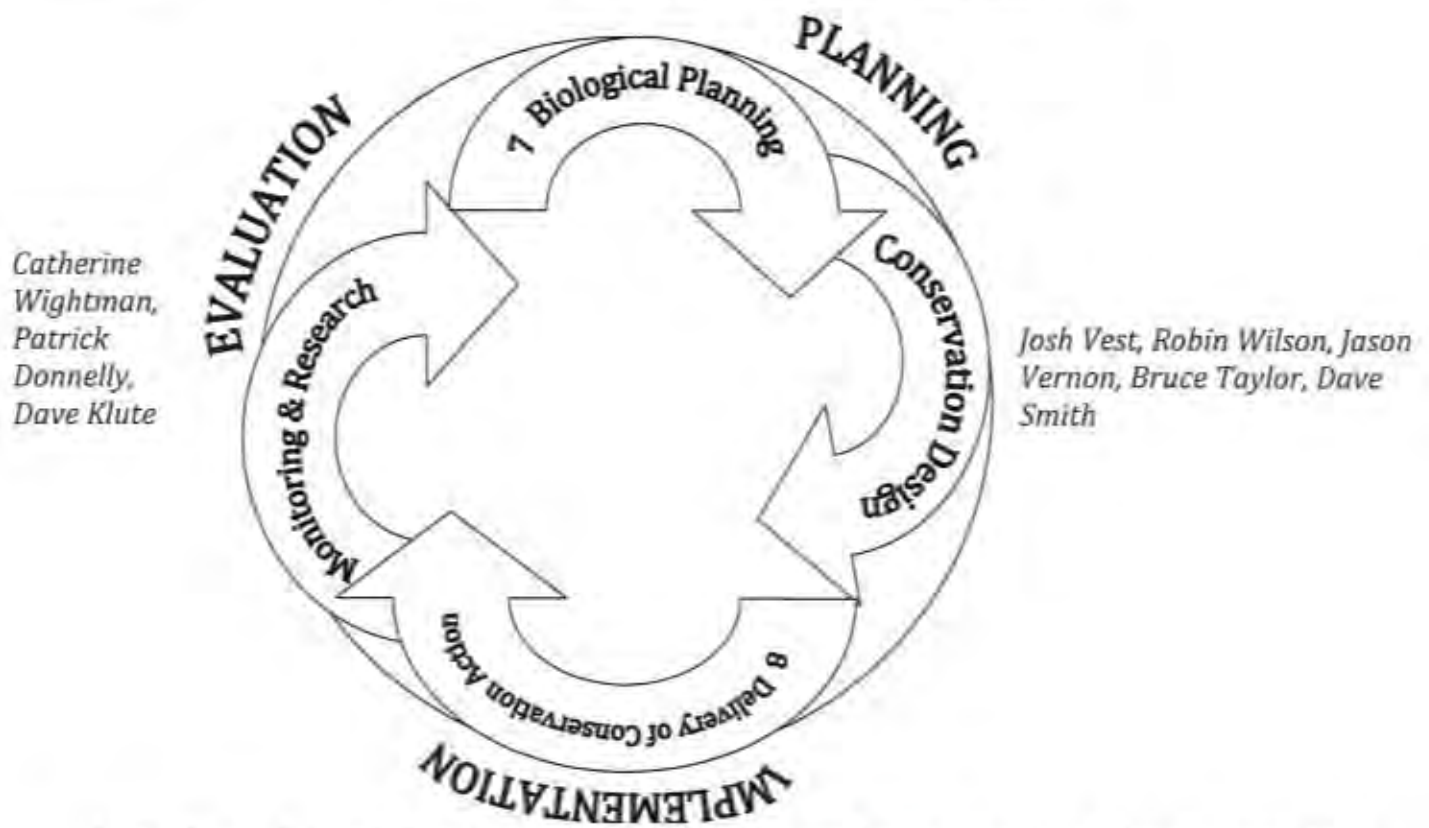
**Strategic Habitat Conservation (SHC): Part I-Josh Vest-Powerpoint Presentation**

- The Framework: Bridging the Gap between Science and Habitat Delivery

**Group Discussion: Where do we each spend the majority of our time in the SHC framework?  
How about our individual agencies/organizations?**

**Figure 1. Individual responses to where each individual spends the majority of their time within the SHC framework.**

*Josh Vest, Edwin Juarez, Steve Tessmann, Craig Garner, Catherine Wightman, Ducks Unlimited  
Biological Planning – John Ranlett, Robin Wilson,  
Patrick Donnelly, Terry Mansfield*



*Randy Gray, Ali Duvall, Don Kemner, Jason Vernon, Bruce Taylor, Dave Smith, Craig Garner, Steve Tessmann, Terry Mansfield, Ashley, Edwin Juarez, Ducks Unlimited Program Delivery – John*

**Strategic Habitat Conservation (SHC)-Part II-Powerpoint Presentations**

- Montana Bird Conservation Partnership Presentation-Catherine Wightman

- Wyoming Wetlands Conservation Strategy Presentation-Steve Tessmann

#### **Group Discussion: Where do we see SHC working well? Where are the bottlenecks?**

The group agreed that SHC is working with respect to sage-grouse with all the right components of the framework coming together. It was also mentioned that JV science is being used in certain places to support NAWCA funding, e.g. SONEC region. It was also noted that many agencies and organizations have invested significantly in the biological planning and conservation delivery components of the framework.

#### **SHC Bottlenecks Identified (continued from above...)**

- Evaluation component needed post-project/lack of funding for evaluation (@ statewide and habitat project scale)
- Communications across the wheel
- Heavy on planning/data analysis component (funding needed)
- Document of success of prior actions through making monitoring strategic
- Burnout on planning
- Time factor (funding coming before data/research complete) needs to be strategic/prioritized to inform assumption-driven process
- 2 camps – PIF/implementation-JVs
- Prioritization of tasks/timeline/partner engagement after species prioritized – where's the momentum?
- Need to focus on 80-20 collaboration to implement SHC-shared vision (follow models that are working)
- Need to go after State \$ w/ Migratory Bird funding
- Travel limitations don't allow for coordination/collaboration

#### **From Conservation Planning and Design to On-the-Ground Results-Part I-Powerpoint Presentations**

- Utah Partnership for Conservation Development Presentation-Jason Vernon
- Farm Bill/Sage Grouse Initiative (SGI) Presentation-Randy Gray

#### **From Conservation Planning and Design to On-the-Ground Results-Part II-Powerpoint Presentations**

- Oregon Habitat Joint Venture: Lessons Learned-Bruce Taylor
- Farm Bill/Wetlands Reserve Program (WRP/WREP)-Randy Gray



The group provided feedback on wetland protection and restoration in the IWJV:

- Technical services in WY NRCS → other agencies in state aid in technical services
- ↑ allocation for technical services in NRCS (issue beyond NRCS [→ OMB] in states & chicken/egg of technical service funding comes based on spent
- Technical assistance (especially engineering; as of 3 years ago, possibly not now) in ID = bottleneck
- Example of partner biologist added to aid in promoting WRP (% NRCS, % partner)
- Terry - example of partners focus on wetlands + sage brush
  - ⇒ marketing + outreach to landowners
  - ⇒ strategically marketing + outreach in priority areas (fund w/ state migratory bird stamp)
- WA bottlenecks = EA (NEPA compliance)
- Water rights issue & permitting (timing as issue)
- Could they allocate funds to a land trust to aid in monitoring of L-T easements?
- Realty specialist capacity possibly from land trusts

**Group Discussion: Review SCP opportunities, what might be missing and explore areas to focus time and resources in the next few years**

#### **The Top 21 Opportunities**

- Identify and pool resources-technical, money and people
- Increase awareness of appropriate funding sources
- Promote partnerships for shared capacity
- Filter broad-scale initiatives to local levels
- Promote and support Farm Bill activities
- Act as implementation arm for statewide PIF and wildlife action plan
- Focus or identify work in or on strategic habitats
- Foster and nurture professional networking
- Facilitate state/local partnerships for habitat work
- Coordinate match and leverage opportunities across state
- Connect partners with project opportunities
- Ability to work across jurisdictional boundaries
- Collaborate with partners on grants
- Provide focus wetland conservation project delivery
- Serve to inform science capacity development
- Set priorities for focal areas
- Coordinate or integrate with other conservation initiatives
- Illustrate and share successes (incl. tech transfer)
- Lead statewide multi-agency conservation planning

- Provide capacity to build and invest in partnerships

## **Thursday, January 20, 2011**

### **Group Discussion: Reflect on Day 1 and SCP Chairs identify leadership challenges**

- Relevance of JV to various partners (especially when their own missions, etc.)
- Multiple JVs w/in state boundaries
- Burnout → what haven't they already done?
- Efficiency in partner activities + limited travel resources (push out info electronically but how to do business?)
- Perceived duplicity of conservation initiatives/efforts (e.g., SGI, PIF, etc.) → also justify your own time on so many → should it be teased out of all brought together? (especially w/ sage grouse) → habitat focus?
- Bridging gap between planning/biology community & implementation community
- Partners feel connection to IWJV (don't think of SCP Chair as the IWJV; valuable to have connection w/ IWJV staff)
- Outreach into conservation districts & statewide associations (as opportunity)
- Motivating people between meetings
- Part-time chair (on catch as catch can basis) as small part of job
- "Capture" – keep people interested beyond 1 meeting on capacity grants
- Engaging partners who aren't in it for \$ (more than those interested in NAWCA, etc.)

### **The IWJV 2011-2015 Strategic Communications Plan-Ashley Dayer-Powerpoint Presentation**

#### **Group Discussion: SCP Role and Function**

What is the role of the SCPs with respect to the IWJV Management Board, staff and broader partner network?

The group reviewed the role of SCPs described by the Management Board- *The State Conservation Partnerships will serve as the primary conservation delivery drivers by facilitating local level habitat projects that contribute to achievement of high priority regional and continental bird objectives.* The SCP Chairs added the following: Bring partners together to facilitate...

- i. Strategic habitat delivery emphasis w/ more or less science emphasis depending on each state's needs
- ii. Emphasize , support SHC approach

- iii. Link to (or bring together w/) other bird initiatives → add value

It was agreed that there would be an organizational template for SCPs to follow, but that each state would be distinct based on history, membership, geography and conservation issues.

ACTION: The following volunteered to help word-smith the SCP role-Terry, Dave Klute, Jason Vernon and Ali Duvall.

Ashley pointed to the immediate organizational goals that were identified in the Strategic Communications Plan for the IWJV and wrapped each of the Top 21 Opportunities for SCPs into one of these goals (see Timeline for Implementation of Communications Plan):

Goal 1-Broaden and strengthen public-private partnerships for bird conservation in the Intermountain West.

- Identify and pool resources-technical, money and people
- Promote partnerships for shared capacity
- Foster and nurture professional networking
- Facilitate state/local partnerships for habitat work
- Connect partners with project opportunities
- Coordinate or integrate with other conservation initiatives
- Illustrate and share successes (incl. tech transfer)
- Lead statewide multi-agency conservation planning
- Provide capacity to build and invest in partnerships

Goal 3-Provide funding, foster leverage opportunities, and enhance partner access to federal, state and private funding programs essential to bird habitat conservation in the Intermountain West.

- Increase awareness of appropriate funding sources
- Promote and support Farm Bill activities
- Coordinate match and leverage opportunities across state
- Collaborate with partners on grants

Goal 5, 6, 7-Bring partners together to conserve intact landscapes of high value to priority species through conservation easements and, where appropriate, fee title acquisition, and restore and enhance priority habitats to support sustainable populations of birds on private and public lands.

- Filter broad-scale initiatives to local levels



- Act as implementation arm for statewide PIF and wildlife action plan
- Focus or identify work in or on strategic habitats
- Ability to work across jurisdictional boundaries
- Lead statewide multi-agency conservation planning
- Provide focus wetland conservation project delivery
- Serve to inform science capacity development
- Set priorities for focal areas
- Coordinate or integrate with other conservation initiatives

How do SCPs function? What's worked well and what hasn't?

- Consider executive committee w/ science, delivery + communications representatives
- Goal 1 → build partnership, 3 → funding support, leverage, etc., 5, 6, 7 → work towards conservation delivery
- **Coordinate project partners** (connection on opportunities & forum for networking)  
Note: in some states, may deliver to
- **Take advantages of opportunities to bring together initiatives + add value** (especially in making conservation happen on ground)
- Ali → SCP Chairs (face of IWJV in State) → Members
- Opportunity to have direct Board communications in states where someone on Board?
- Monthly teleconferences → SCP Chairs (amended to bi-monthly at end of meeting)
- Face-to-face 1 time per year → SCP Chairs
- Add IWJV staff (Ali) to State email lists → SCP Chairs
- Summary of JV activities in States → Ali makes sure staff + Board aware
- Frequent updates from staff/Ali that SCP Chairs can send to members (some directly to members like e-newsletter)
- Management Board updates (+ Management Board packet) & moving Management Board meeting to States
- Using/passing on communication tools
- Occasionally face-to-face visits or partner
- E-newsletter + web → state content (on schedule? → be transparent)

**Group Discussion: SCP Member Composition-Who participates, who doesn't and who should?**

- Delivery partners
  - ⇒ Land conservation
  - ⇒ Restoration
  - ⇒ Policy

- ⇒ Communication
- Science
- Types – in state agency + beyond – of birds + private lands – divisions of state + Feds
- Add (start w/ list from Ashley's presentation):
  - ⇒ Tribes
  - ⇒ Other interested individuals (retirees, bird conservation go-getters)
  - ⇒ Conservation/irrigation districts
  - ⇒ Other state agencies w/ connection to habitat
  - ⇒ Groups affiliated w/ landowners → ranching
  - ⇒ DOD + other habitat staff in fed agencies
  - ⇒ Farm Services Bureau
  - ⇒ Local government (county, city)
  - ⇒ Watershed councils/sub-conservancies/groups
  - ⇒ Weed management
  - ⇒ Academic researchers
  - ⇒ Regional (habitat) initiatives
  - ⇒ Industry – oil, gas, energy
  - ⇒ University extension

#### Member Roles

- People who will be active
- Chair + possibly co-chair (potentially w/ other major state bird initiative)
- In some cases, Chair + Coordinator
- Consider an Executive Committee → some people who vote + share work

#### **2011 Activities & Opportunities for Enhanced Communication**

- Meeting follow-up: word-smith role, function, membership & activities for group review and approval
- Enhanced communication between staff and SCPs
  - 1) bi-monthly SCP calls (training/support/handout to improve coordinator skills/be prepared to share what's working well)
  - 2) Ali email to group when priority issues arise
  - 3) cc Ali on summary notes/meeting activities, etc.
  - 4) face to face attendance at meetings across IWJV
  - 5) quick flag on workshops/trainings
- Enhanced communication between Management Board and SCPs
  - 1) board meeting packets and minutes out
  - 2) field trips with SCPs at Board meetings

- 3) SCP summary by Ali at Board meetings
- 4) request to Board members to meet before meetings for update and vice-versa
- 5) directory of SCP members to Board
- Website – SCP review of site overall, SCP page design/template, develop content for pages, place to park documents
- E-newsletter – feature 2.5 SCPs per newsletter
- IWJV partner database
- WRP/making program more effective in IWJV – make focus of next call.
- Capacity grants
- Annual face-to-face meeting

#### **Meeting Wrap-Up: Review of Discussion, Action Items and Meeting Evaluation-Ashley Dayer**

The meeting was summarized in terms of follow-up activities. Dave and Ali thanked Mike, John and Edwin for hosting the meeting and all participants for taking the time out of their busy schedules to attend.

##### **1. Negative**

- Slide clicker malfunction
- Lunch snafu
- More time on leadership challenges (go deeper)
- Some discussions should go over the allotted time with flexibility to go off schedule

##### **2. Positive**

- There was a meeting!
- Mix of discussion & presentations
- Facilitation allows the group to get through full agenda
- 2 day maximum (w/ field trip as part)
- Full staff attendance so all interact w/ SCP Chairs
- Travel funding + letter of support to ensure able to travel out of state
- Meetings at facility you're staying at
- Opportunity to learn from other State SCP Chairs + get ideas
- Reinforce JV on right track (FB, SWAP, etc.) + connection between them
- More value in person → build relationships



Participants concluded the meeting with a field trip to the Whitewater Draw Wildlife Area which provided for the opportunity to view thousands of Sandhill Cranes and other migratory birds.

**From:** Van Horn, Kent - DNR <Kent.VanHorn@Wisconsin.gov>  
**Sent:** Monday, September 26, 2011 9:42 PM  
**To:** info@nawmprevision.org  
**Subject:** NAWMP Revision Comments - Wisconsin

NAWMP Revision Steering Committee,

I am writing on behalf of the state of Wisconsin to provide comment on the draft revision of the North American Waterfowl Management Plan. We recognize the significance of the current NAWMP document and subsequent revisions. The habitat conservation across the continent that has been achieved under the guidance of NAWMP has benefited waterfowl, as well as innumerable wildlife and environmental resources. We agree and recognize that while our goal of habitat conservation for waterfowl remains unchanged the methods we use to achieve our goals must continue to adapt to the changing land and social landscape. Thirty years ago we were faced with declining habitat conditions, waterfowl populations and hunter numbers. We set our sights on a past era of the 1970's with which to measure our work to improve the conditions of the 1980's. Since then we have worked hard to protect and manage wetland and grassland habitats, most waterfowl populations have improved to abundant levels while hunter numbers have continued a slow decline in most areas of the United States and Canada. The social, physical and biological landscape has changed. The North American human population is more urban, electronic focused and less connected to natural resources. We have some waterfowl populations that have shown declines (wigeon, scaup) likely resulting from factors the waterfowl management community has little ability to change (climate change) while other populations (white geese and temperate breeding Canada geese) have grown to very high nuisance levels in many areas. The government policies and funding sources that have been the foundation of our work are now shifting sands. However, the inherent truths that healthy wetlands and other natural habitats are vital to human and animal life, and that the common value of a migratory waterfowl resource connects people across cultures and borders have not changed. We remain committed to the conservation of both waterfowl populations and the habitats upon which they depend.

Staff from the Wisconsin Department of Natural Resources have been involved in the planning and implementation of NAWMP at the continental, regional and state level since its inception. During this recent revision process, Kent Van Horn, state waterfowl biologist, was able to participate in the round 1 and 2 workshops, Tom Hauge, Wildlife Bureau Director and long time leader in the Mississippi Flyway and National Flyway Councils, participated in the planning and round 1 workshop for the NAWMP revision and Bill Vander Zouwen Wildlife Ecology Section Chief and chair of the Upper Mississippi River and Great Lakes Region Joint Venture Management Board participated in the round 2 workshops. We thank the plan committee for their efforts and the opportunities to participate in the process.

As we have followed and participated in the planning process beginning with the 2008 waterfowl summit in Minneapolis we realize that the waterfowl management community represents a diversity of experiences and viewpoints. This was particularly evident in the variation of input among workshops. However, it appears that the plan recognizes this diversity and has attempted to cast a vision for us all to continue to work together and stay focused on the goals of habitat and waterfowl conservation while recognizing these are inherently linked to the status of the population of people interested in waterfowl conservation.

As requested we offer comments on the following topics:

#### **1. The greatest challenges facing waterfowl management in the next decade**

The efforts and intent of this NAWMP revision presents 2 important facts. The fact that high waterfowl populations and regulation changes are not driving waterfowl hunting interest/participation and second that the elements of habitat conservation, participation of waterfowl hunters and other wildlife enthusiasts, and waterfowl populations are all interdependent. The evolution toward greater integration and understanding among these elements needs to take the next step into the future. The challenges must be faced through the strength of this integration and adapting our management systems.

The greatest challenges will continue to include the conservation and management of habitat in the face of changing policies (farm bill) and decreases in traditional funding sources. The waterfowl management community needs to adapt



to these changes while continuing to influence the direction of government policies and potential funding sources. We need to look at connections between related initiatives that influence landscape change and human interest in waterfowl and wetlands. The waterfowl management community has experience and resources to offer other initiatives in agriculture, conservation and outdoor recreation that can result in mutual benefits.

An increasing challenge to waterfowl management and all forms of natural area/wildlife conservation is the increasing dissociation the North American human population has with the natural world. This is not only represented by a decline in waterfowl hunter numbers but a general disconnect between people and the natural world. The waterfowl management community will need to look for partnerships among those who see the need and value of increasing the connection between people and the natural world.

## **2. The appropriateness and relative importance of the three goals**

We believe that the three goals stated in the NAWMP revision are appropriate. As noted in the document they will require more specific measurable objectives which we understand will come with a later document. For many in the waterfowl management community, including some of our staff, it is difficult to comment on the current document without seeing the specific measurable objectives that will be applied to each goal and the integration framework that will bring better coherence. It will be important for there to be a thoughtful adaptation of the work currently being planned and implemented to step down NAWMP and Joint Venture goals to the local level into the support work for the habitat goals of the future. Despite these concerns, we are very encouraged that the deficiencies in monitoring and considering hunter/human dimensions aspects in continental waterfowl management have been identified in the plan and that improving our work in this area is identified as a major goal of the plan. We consider this statement critically important; “more explicitly incorporate human objectives into our decision-making process”. With that said, it should be recognized that at the state level many agencies have been working to incorporate human dimensions data and metrics into the decision making process for several years. As a result, we have examples and experience within the waterfowl management community that can be used in the next step (Integration Technical Team) in the proposed NAWMP process.

With regard to the relative importance of the goals, it appears that the summary of the “Valuing Objectives” exercise produced “nearly equal intrinsic values” among healthy populations, conserving landscapes and the human enjoyment of waterfowl (hunting and viewing). We believe that this is a good representation of the composite attitudes within the waterfowl management community. We support an approach where these “3 legs of the stool” are given equal importance and support, recognizing that this will require a shift in our management systems without abandoning many elements that have been successful in protecting habitat and improving waterfowl populations.

## **3. The most important, measurable objectives that would serve to accomplish the stated goals, and how to develop these**

Waterfowl population objectives will need to remain an important element of NAWMP, however, we are supportive of species population goals other than those based on population levels of the 1970's. Addressing the question of “How many ducks is enough (or How many geese is too many)?” by species or species group in relation to human expectations and habitat carrying capacity is critical to establishing new waterfowl population goals. When most duck populations are well beyond a “species of concern” level is it really necessary, for example, to spend so much regulatory energy reducing the scaup bag limit or season length because we no longer have 7 million scaup? Why is 4 million scaup not enough? The sooner we move away from a romantic memory of the 1970's as the waterfowl hunting utopia and look toward a very different 21<sup>st</sup> century the better our management will become.

The area of human dimensions is clearly the new challenge for setting measurable objectives. However, there are several states that have repeated waterfowl hunter surveys over multiple years to measure “What does a waterfowl hunter want and how are we doing?”. In Wisconsin, our waterfowl hunter surveys have revealed important facts that could significantly change waterfowl management focus if similar results are obtained at a flyway or continental level. For example, we asked hunters to rate the attributes (out of a list of 20) that contribute most to a satisfying waterfowl hunting experience 3 times over a 6 year period. Five of the top 6 answers were consistently social or hunting experience attributes. Seeing ducks and geese was the only attribute that related to population goals and this ranked 4<sup>th</sup> or 5<sup>th</sup> out of the top 6. Attributes such as not having conflicts with other hunters or not being crowded were important as well as being with friends and passing on the waterfowl hunting tradition. If we can shift our management focus to measure the attributes that more strongly impact a waterfowl hunter's experience then maybe we can slow or stop the decline in waterfowl hunter numbers. For example, we could establish a base satisfaction level among waterfowl hunters related to avoiding crowding while hunting and then work together to fund new public land acquisition or access where hunter density is limited. We could then continue to measure changes in hunter satisfaction in relation to crowding and we may find

improving the hunting experience is more important to maintaining hunter participation than growing more ducks in Canada.

**4. The nature of useful objectives related to recruiting and retaining waterfowl hunters**

See our example in relation to Question 3. Human dimension research and monitoring should help us address the question posed in the plan “Are we doing the right things?” It seems apparent that we are not doing the right things if we have been unsuccessful in the goal of stopping the decline in waterfowl hunter numbers. The folks who would make up the Human Dimensions Working Group would be the appropriate group to propose such objectives.

**5. The means to engage a broader constituency (i.e. beyond hunters) in the cause of waterfowl conservation**

There are many existing efforts to re-engage the human population with the natural world. We need to look for common ground with existing initiatives and be willing to work together outside of our normal network of colleagues.

**6. The concept of integrated waterfowl management and the greatest challenges/benefits likely associated with integration**

Please see our introductory comments above.

**7. Strategies that would make waterfowl management more efficient, effective and responsive**

We believe that as we improve the integration of human dimension evaluation and objectives into the waterfowl management work, we will learn much about whether we are “doing the right things”. When we establish measurable objectives related to the human dimensions of people interested in waterfowl conservation they will point to priority work. As we learn we will need to be willing to let go of practices that are outdated and respond to new opportunities.

**8. The necessity of changing or adapting our current institutions in order to implement the new NAWMP and the nature of the changes that may be warranted**

We acknowledge that institutional changes will be necessary but are hesitant to predict what changes will be needed without working first on objectives and potential integration frameworks.

**9. The sufficiency of proposed recommendations and action steps to move this plan forward**

The recommendations and actions steps contain far less detail and specifics than we expected and we believe reaction from much of the waterfowl management community will reflect a similar sentiment. While we are supportive of the conceptual direction articulated in the plan, we are concerned that the direction promoted by this document will be stalled by a lack of support by the waterfowl management community because of the conceptual level of the plan. It may be helpful if the next steps included a timeline for creation of the ITT, measurable objectives etc. or more detailed examples of potential elements of the action plan.

We again thank you for the opportunity to participate in this revision of the North American Waterfowl Management Plan.

 **Kent Van Horn**


Migratory Game Bird Ecologist

Bureau of Wildlife

Wisconsin Department of Natural Resources

(📞) **phone:** (608) 266-8841

(✉️) **e-mail:** kent.vanhorn@wisconsin.gov



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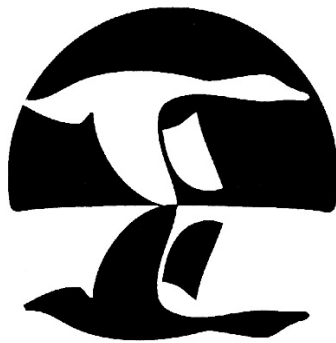
**From:** Jorge\_Coppen@fws.gov  
**Sent:** Tuesday, September 06, 2011 10:41 AM  
**To:** info@nawmprevision.org  
**Subject:** Just a few typos on pages 18, 20 and 21  
**Attachments:** NAWMP 2012 JC comments.pdf

Just a few minor typos - see pages 18, 20 and 21.

# North American Waterfowl Management Plan 2012

## Responding to Change: A Vision for Integrated Waterfowl Management

*Draft*



*North American Waterfowl  
Management Plan*

*Plan nord-américain de  
gestion de la sauvagine*

*Plan de Manejo de Aves  
Acuáticas de Norteamérica*

## Executive Summary

The North American Waterfowl Management Plan (NAWMP<sup>1</sup> or Plan) has a remarkable conservation legacy and remains one of the most successful conservation initiatives ever undertaken. The Plan has always endeavored to benefit and inspire action by agencies, waterfowl hunters, other conservationists and citizens with a passion for waterfowl and wetlands, while recognizing that support from diverse segments of society is crucial to the Plan's success. This is a proud heritage to build upon.

But ours is a time of mixed signals for waterfowl management. The 2011 breeding population index of ducks in the traditional survey area is among the largest ever recorded, and the size of the duck and goose harvest has rebounded to that of the 1970s – the baseline period for the original Plan. However, the number of U.S. waterfowl hunters continues to decline. Threats to critical waterfowl habitat are mounting in all three countries, even as federal, state and provincial agencies slash their conservation investments to deal with new fiscal realities. Successive years of good moisture on the breeding grounds may have temporarily boosted duck populations and harvest, but there is danger in complacency. In the face of accelerating economic, social and ecological change, the future of the waterfowl resource, and the legacy of waterfowl hunting, is far from secure.

It is critical that we redouble our conservation efforts, reverse the decline in hunter numbers, and reach out to other members of society who benefit from, and could contribute to, wetland and waterfowl conservation. The Plan must continue to evolve and address these challenges, and we are well-positioned to do so. A hallmark of the NAWMP community has been our capacity to adapt and to continually improve our harvest, habitat and other management programs.

As part of the scoping for this Revision, the waterfowl management community was asked to review and re-establish fundamental goals for our enterprise – something that had not been done in 25 years. A renewed purpose statement for the Plan evolved from those consultations: **to sustain North America's waterfowl populations and their habitats at levels that satisfy human desires and perpetuate waterfowl hunting, accomplished through partnerships guided by sound science.** Further, three goals emerged as being fundamental to the Plan's success:

- **Abundant and resilient waterfowl populations to support hunting and other uses without imperiling habitat.**
- **Wetlands and related habitats sufficient to sustain waterfowl populations at desired levels, while providing places to recreate and ecological services that benefit society.**
- **Growing numbers of waterfowl hunters, other conservationists, and citizens who enjoy and actively support waterfowl and wetlands conservation.**

While each goal has intrinsic value, they also have utility in helping to achieve other goals. For example, healthy waterfowl populations are necessary for waterfowl hunting, viewing, and other

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<sup>1</sup> See Appendix A for a list of acronyms used in this Plan.

recreational activities. Wetlands are essential for sustaining populations as well as providing places for waterfowl-related recreation. Waterfowl hunters and other supporters provide funding and advocate for public policies that conserve wetlands and other waterfowl habitat. Thus, actions undertaken to accomplish one goal have consequences for achieving the other goals. They are inextricably linked.

Simultaneously pursuing multiple, linked goals requires a coherent, integrated system – something that does not exist in North American waterfowl management. Implementing such a system will be challenging, but doing so will make waterfowl management more effective, efficient and adaptable. This is the vision of the NAWMP.

An integrated system would feature:

- Quantifiable objectives established in support of the goals, for which we can prescribe actions and predict outcomes;
- A overarching framework, supported by linked models, which enables managers to understand and balance tradeoffs among the goals and objectives;
- A system that links objectives and ensures coherence across focus area, Joint Venture, and continental scales;
- An inter-related set of decision models that managers can use to efficiently allocate resources to achieve the objectives, recognizing that a single model will not be adequate to encompass all decisions;
- Monitoring systems that track progress towards objectives and enable a comparison between observed versus predicted outcomes; and
- Institutional and cultural change to facilitate an integrated system.

As was the case with the original NAWMP, this Revision proposes new actions and a new vision for waterfowl management, recognizing that implementation will occur only if the ideas herein are sufficiently compelling to move the management community to action. The following recommendations will illuminate the path to a new era in waterfowl conservation:

*Adopt common goals* – An extensive consultation process has led to the formulation of three goals for waterfowl management described in this Revision. Embracing these as common goals will help unify the waterfowl management enterprise.

*Adopt the vision of an integrated enterprise* – The need for an integrated management system is apparent. There are substantial benefits to working towards common objectives within a framework that will enable us to acknowledge and balance trade-offs among objectives and actions.

*Actively manage the linkages within waterfowl management* – The linkages among waterfowl populations, habitats and users/supporters are vital to the functioning of our enterprise. They must be actively managed with the same level of forethought and planning as we employ to achieve the goals themselves.

*Embrace the imperative for change and adapt accordingly* – The manifold changes affecting waterfowl management are overwhelming our current approaches to conservation. We must continue to develop management frameworks that acknowledge these changes, and adapt accordingly to sustain waterfowl, their habitats and a responsive waterfowl management enterprise.

*Continue to improve our management performance* – Numerous advances have been made by posing – and answering – the basic question of, “are we doing things right”? More significant change has resulted from asking ourselves, “Are we doing the right things”? We are now at a juncture where we need to address even higher-order questions: do we have the proper decision-making tools, institutions and governance to accomplish our goals?

*Establish a process for institutional review and change* – Ideally, institutions evolve to enable management systems to function efficiently. However, sometimes institutional change must help lead the way towards a better approach of doing business. This Revision is intended to prompt the management community to actively consider appropriate institutional changes to enable an integrated system.

*Increase our institutional capacity to address the changing social landscape* – An essential first step will be to establish a Human Dimensions Working Group for waterfowl management. An HDWG will provide the necessary expertise to accomplish the third goal of this Plan – growing the number of waterfowl hunters, other conservationists, and citizens who enjoy and actively support waterfowl and wetlands conservation.

*Motivate others to join the cause* – As we consider how we position waterfowl management for the future, we must also commit ourselves to enlarging our base of supporters. For decades, waterfowl hunters have provided the financial and political foundation for waterfowl conservation. It is time to motivate a broader segment of society to participate in this cause.

The inseparable linkages among waterfowl, habitat and people are reaffirmed in this Revision. Achieving our shared goals will require that we work together in a manner that is more integrated, effective, efficient and adaptable than ever before. Creating an integrated system of waterfowl management will require that we re-examine our institutions and our traditional ways of doing business. To move us further towards coherence and integration, the NAWMP Plan Committee should continue to play a temporary facilitation role, assisted by a technical team, until such time as the federal wildlife agencies create a more permanent coordination structure.

Developing an integrated management system will be an evolutionary process, not a singular event. It may be technically challenging, however those challenges will be more than offset by greater efficiencies and effectiveness. Now is the time to commit to the task.



**Introductory Material (to be added)**

Signature page for ministers (with short context paragraph in 3 languages)

National Overviews provided by the federal wildlife agencies (Canada, United States and Mexico)

Preface (by Plan Committee)

Dedication (by Plan Committee)

Acknowledgements (by Plan Committee)

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## Introduction

For over 25 years the North American Waterfowl Management Plan (NAWMP or Plan) has galvanized the community of conservationists on this continent to protect and enhance habitats essential to waterfowl. The Plan ranks among the largest and most successful conservation initiatives ever undertaken.

So why change the NAWMP? On the surface things seem to be “working” now. The 2011 breeding population index of ducks in the traditional survey area is among the largest ever recorded, and the size of the duck and goose harvest has rebounded to that of the 1970s – the baseline period for the Plan. However, the number of U.S. waterfowl hunters continues to decline. Threats to critical waterfowl habitat are mounting in all three countries, even as federal, state and provincial agencies slash their conservation investments to deal with new fiscal realities. There is a clear sense that the future of the waterfowl resource, and the legacy of waterfowl hunting, are far from secure.

We must get better at what we do because the economic, social and ecological challenges we face create great uncertainty, and we must plan and adapt accordingly. Moreover, fiscal realities demand that we become more efficient and effective in our management endeavors. Accordingly, this document is not so much a detailed “plan” as it is a vision for the future of waterfowl management. Our intent here is to define the challenges clearly and begin to identify the actions that must be pursued over the next 2-5 years to meet this challenge. In the end, this Revision of the Plan is truly that – an effort to “re-vision” our fundamental goals and objectives, our programs and the linkages among them, and the institutional structures and support that will sustain waterfowl, hunting, wetlands and associated public values for decades to come.

### For Whom is this Plan Written?

This Plan was developed in consultation with the waterfowl management community, and is intended to be used by those who manage waterfowl harvest, deliver habitat conservation programs, and ensure that diverse groups of people can continue to use and enjoy the waterfowl resource. It was written primarily for the benefit of people who interact most closely with the waterfowl resource: waterfowl hunters, other conservationists and citizens whose passion is waterfowl and wetlands.

Other members of society are crucial to the success of this Plan. Societal support for the conservation of wetlands, grasslands and other landscape features may occur for reasons other than waterfowl conservation. Nonetheless, these features may contribute significantly to achieving Plan goals. Lastly, there are many affected parties who we reach through this Plan, or who can affect the outcome of this Plan through their independent actions. Farmers, ranchers and government municipalities are obvious examples. Without the habitat they provide, the goals of the NAWMP cannot be achieved.

Finally – and most importantly – this Plan is for the 37 species of ducks, geese and swans that traverse North America, providing countless hours of enjoyment and a connection with nature and the great outdoors that enriches our lives.

In undertaking this renewal of NAWMP, the Plan Committee (PC) believes it is imperative, given the manifold challenges at play, that stakeholders in waterfowl management review and re-

establish their fundamental conservation goals – something that has not been done in a quarter-century. To achieve broad consensus, the consultation process leading up to this Revision engaged a cross-section of the professional waterfowl management community, including a broad sampling of federal, state and provincial agencies, non-governmental organizations and other partners. Thirteen consultation workshops, along with other input, produced a rich source of ideas that formed the foundation of this Revision<sup>2</sup>.

Despite the broad range of workshop participants with widely divergent interests and professional responsibilities, strong consensus emerged on a renewed purpose for the North American Waterfowl Management Plan with three fundamental goals:

**“The purpose of the North American Waterfowl Management Plan is to sustain North America’s waterfowl populations and their habitats at levels that satisfy human desires and perpetuate waterfowl hunting, accomplished through partnerships guided by sound science.”**

**Goal 1: Abundant and resilient waterfowl populations to support hunting and other uses without imperiling habitat.**

**Goal 2: Wetlands and related habitats sufficient to sustain waterfowl populations at desired levels, while providing places to recreate and ecological services that benefit society.**

**Goal 3: Growing numbers of waterfowl hunters, other conservationists, and citizens who enjoy and actively support waterfowl and wetlands conservation.**

While each goal has intrinsic value, they are also strongly inter-related<sup>3</sup>. Healthy populations are a requisite for hunting seasons and other forms of waterfowl-related recreation. Without wetlands and other critical waterfowl habitats, healthy populations cannot exist. In the absence of funding and advocacy provided by waterfowl hunters and others who support conservation,

#### **A Companion NAWMP “Action Plan”**

This NAWMP Revision is intended to be a visionary document that re-establishes the goals of waterfowl management, underscores the linkages among those goals, and highlights challenges and the imperative for changing our way of doing business. However, by design, it is not intended to provide details about precisely how – and by whom – an integrated system would be developed and the final form of such a system. To address that need and provide added momentum for progress, a companion “NAWMP Action Plan” is being prepared in consultation with technical experts in the management community. The “Action Plan” will be available to the management community prior to adoption of this Revision, and will serve as a technical roadmap to aid in the development of an integrated management system.

<sup>2</sup> A detailed description of the NAWMP workshops can be found in the report “Stakeholder Consultation Process Results: North American Waterfowl Management Plan Revision”, by D.J. Case and Associates, April 2011. <http://www.nawmprevision.org/>

<sup>3</sup> See Appendix C, which describes the goal valuation exercise conducted during NAWMP consultations and the linkages among the goals.

habitat programs would be greatly diminished. Thus, actions undertaken on behalf of one goal will inevitably affect the attainment of other goals.

Simultaneously pursuing multiple, linked goals requires an integrated management system that currently does not exist within the waterfowl management enterprise. Instead, Flyway Councils focus on population and harvest objectives. NAWMP Joint Ventures (JVs) and most non-governmental organizations (NGOs) primarily engage in habitat conservation. There are no formal institutions in place to address such issues as hunter recruitment and retention, or for that matter other users of the waterfowl resource.

This NAWMP Revision (Revision) offers guidance on the simultaneous pursuit of these three goals. Challenges abound. The path is only partially defined, but it is a path we must travel to secure the future of waterfowl, wetlands, hunting and other human use.

Our vision of the future is expansive. It includes:

- Hunters, conservationists, and other citizens, all seeking beneficial gains for the ecosystems and wildlife they value.
- People connected to the outdoors and committed to conserving natural areas and abundant waterfowl populations.
- Sufficient waterfowl and habitat to support hunting and other human uses.
- Broad public support for habitat conservation on public and private lands.
- Continued financial support from public and private sources.
- An environment that sustains nature's functions (water quality, flood control, other services), people and wildlife.

In this Revision, the inseparable linkages among waterfowl, habitat and people are reaffirmed. Achieving our shared goals will require that we work together in a manner that is more integrated, effective, efficient and adaptable than ever before.

### **Principles of the North American Waterfowl Management Plan**

The following principles, several carried forward since the inception of NAWMP in 1986, should guide all actions undertaken in support of the Plan:

1. Waterfowl are among North America's most widely recognized and highly valued natural resources.
2. Protection of shared waterfowl populations and their habitats requires long-term planning and facilitation of management activities in Canada, Mexico, the United States, and other countries important to migratory waterfowl occurring in North America.
3. Waterfowl management is a complex enterprise involving governments, people, waterfowl

populations, wetlands and other habitats. These elements are highly inter-dependant and should be managed in a coherent, integrated manner<sup>4</sup>.

4. Resident and endemic species also are important components of each nation's waterfowl resource and deserve conservation emphasis from within the jurisdictions where they occur.
5. Managed harvests of the renewable waterfowl resource are desirable and consistent with its conservation.
6. Maintenance of abundant waterfowl populations is dependent on protection, restoration and management of habitat and the support of people who use and value these resources<sup>5</sup>.
7. Primary vehicles for accomplishing Plan objectives will include partnerships within and among three key waterfowl management arenas: habitat conservation (e.g., JVs), population management (e.g., Flyway Councils), and resource users (hunters and other primary stakeholders)<sup>6</sup>.
8. Long-term protection, restoration, and management of waterfowl habitats requires that Plan partners collaborate with conservation and community efforts in the development of conservation, economic, and social policies and programs that sustain the ecological health of landscapes.
9. Sound science and knowledge is the foundation for planning, implementing and evaluating NAWMP programs.
10. Programs that manage waterfowl populations, habitats and recreational users should embrace and employ adaptive management. Plan progress requires an unwavering commitment to support essential monitoring and assessment activities<sup>7</sup>.

### **A Century of Progress, A Future of Change and Adaptation**

Waterfowl management in North America has a rich history of cooperative conservation advances. Concern over dwindling bird populations during the first part of the 20<sup>th</sup> century prompted international attention, visionary international treaties and national legislation for the conservation of this shared resource. The challenges of managing migratory waterfowl spurred the development of large-scale programs to monitor populations and take management actions such as regulating the harvest. Migratory pathways transcending national boundaries, and the need for coordination, led to the formation of the Flyway System. This provided an institutional framework for working together on scientific and public policy issues. Similarly, in Canada,

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<sup>4</sup> New for 2012.

<sup>5</sup> Newly expanded to include people.

<sup>6</sup> Newly expanded to include more than JVs.

<sup>7</sup> Newly expanded to include more than biology and conservation programs.

harvest regulations have been in effect since the 1920s and management mechanisms appropriate to Canada have developed, particularly in the later half of the 20<sup>th</sup> century. Despite differences in national governance systems, Canada has actively worked with the Flyway system, particularly for gathering and sharing technical information.

Widespread drought and declining waterfowl populations during the 1930s led to the creation of the U.S. Migratory Bird Hunting and Conservation Stamp (“Duck Stamp”) and investments in habitat conservation. Similar concerns led to the founding of several private conservation organizations, such as Ducks Unlimited in 1937, and the first inter-nationally funded habitat projects in Canada. The “duck stamp” in Canada was introduced in 1985 as the “Canadian Wildlife Habitat Conservation Stamp”, which is administered by the non-profit organization Wildlife Habitat Canada.

Again in the 1980s, drought and declining duck populations prompted a bold response from the waterfowl management community with the establishment of the NAWMP. International agreement over shared objectives and a vision for public-private partnerships evolved into JVs. These are continuing legacies of the Plan that transformed the face of wildlife conservation in North America. Passage of the North American Wetlands Conservation Act (NAWCA) by the U.S. Congress in 1989 created a vital funding source and a mechanism for leveraging public and private matching funds for wetland conservation in Canada, Mexico and the United States. The most significant advances in habitat conservation under the NAWMP can be traced to the NAWCA and the financial support it provided.

Since 1986, Plan partners have invested more than four billion dollars (USD) in the protection and restoration of 15.7 million acres (63,000 square kilometers) of wetlands and associated habitats, and have helped shape land-use, agricultural, and other public policies critical to sustaining continental waterfowl populations. Plan partners have also advanced the science of waterfowl conservation, applying new concepts, data and tools to better focus resources and enhance benefits for waterfowl.

In parallel fashion, decades of scientific and administrative efforts to ensure the sustainability of waterfowl harvest culminated in the mid-1990s with the implementation of Adaptive Harvest Management (AHM) in the United States, providing a more objective-driven, science-based, transparent process for harvest management. First focused on mid-continent mallards, this approach is being extended to other species, and the principles underlying AHM continue to shape advancements in both the science and institutional processes of harvest management.

Throughout the evolution of waterfowl management, the interdependencies of habitat and harvest management have been widely recognized. From a decision-making perspective, however, harvest and habitat management have been intentionally segregated. This separation widened in the 1990s out of a desire on one hand to focus on the new habitat conservation partnerships formed under the Plan and, on the other hand, on the science and administration of AHM.



While this separation of management programs served a purpose, it also created difficulties. A disconcerting symptom of separation is that until now waterfowl managers have lacked a comprehensive set of shared objectives. Shared objectives are a necessary first step in ensuring that management programs are aligned and working in a complementary fashion, and that management resources are being allocated efficiently across programs.

Realization of the inefficiencies associated with segregation of harvest and habitat management has emerged over the past decade, resulting in a call for greater coherence and integration of waterfowl harvest and habitat management. This led to a more rigorous effort to explicitly interpret Plan population goals and make recommendations on the appropriate relationship of population and habitat objectives to harvest management objectives. The report from the Joint Task Group<sup>8</sup> recommended a technical framework for specifying and evaluating the implications of common objectives for waterfowl management. Concurrently, the first comprehensive assessment of the NAWMP<sup>9</sup> (Assessment) offered parallel recommendations. About the same time, the 2006 National Duck Hunter Survey, commissioned by the National Flyway Council (NFC) and Wildlife Management Institute, provided new insights about stakeholder values and preferences. However, many questions remain about how to integrate this information when making management decisions.

Finally, at a meeting of some 200 North American waterfowl management leaders in August 2008, practitioners from both harvest and habitat management explored the implications of more fully integrated objectives, modeling frameworks, and monitoring programs for waterfowl management. They recognized that no institution existed to oversee integrated decision-making, and that the waterfowl management community needed to find a way to better coordinate its work. Accordingly, workshop participants agreed that this Revision would be a useful mechanism for advancing a vision for integrated waterfowl management.

### **Waterfowl, Wetlands and People: Valuing the Connections**

The original Plan conceived the idea of JVs, a novel, partnership-based local approach to conservation. It also offered some explicit (and numerous implicit) objectives related to human use of waterfowl, particularly for hunting. This partner-based approach to conservation that evolved from the 1986 NAWMP has been widely emulated and universally acclaimed. JVs have flourished in number, geographic extent, and taxonomic breadth. Nearly all waterfowl populations are more abundant now – some considerably more abundant – than they were at the launch of the NAWMP. However, there continues to be growing concern over the loss of waterfowl hunters and habitat.

When the original NAWMP was adopted in 1986, mid-continent duck populations had been in

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<sup>8</sup> Anderson, M.G. et al. 2007. Report from the Joint Task Group for clarifying North American Waterfowl Management Plan population objectives and their use in harvest management. Unpublished report. 57pp.

<sup>9</sup> Paulin, D. et al. 2007. North American Waterfowl Management Plan continental progress assessment. Final Report. Unpublished report. 98pp.

general decline for 14 years and hunter numbers (as indexed by migratory bird hunting stamp sales) were following suit (Fig. 1). These circumstances created the specter of a downward spiral in which habitat, waterfowl populations and hunters would continue to decline, and created a clear sense of urgency. While many argued that the task was too daunting and the threats beyond our control, the architects of the NAWMP triggered a new era in waterfowl management by expanding the scope of habitat management from public lands to landscapes, encouraging new institutional arrangements embodied in the JVs, strengthening international alliances, fostering new partnerships, and ultimately developing new legislation and funding mechanisms (e.g., NAWCA) to support waterfowl habitat conservation.

In 1986, it was generally assumed that the loss of habitat was largely responsible for the decline in waterfowl populations, and that associated conservative hunting regulations and reduced bird abundance triggered the reduction in waterfowl hunters. Accordingly, many believed that restoring habitat would reverse the trends in both populations and hunter numbers. Alternative hypotheses for hunter decline included increased regulatory complexity and reduced public

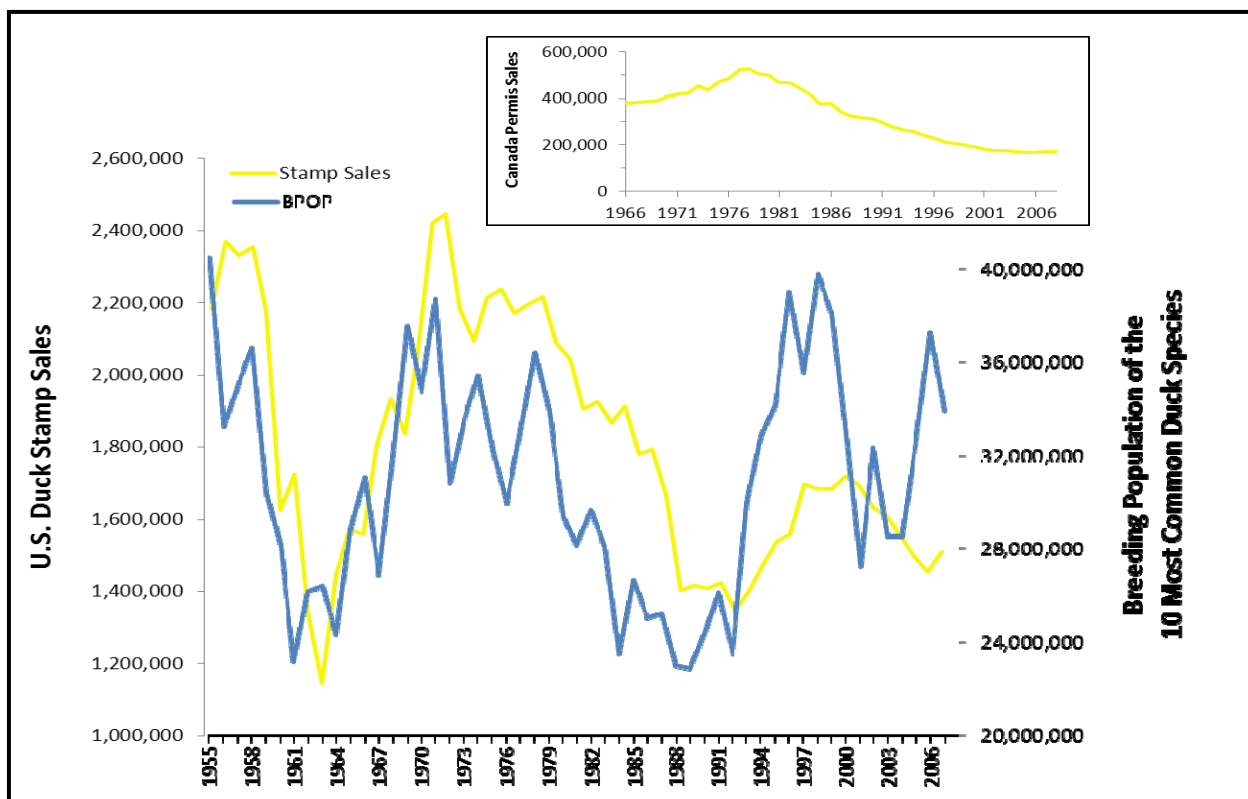


Figure 1. U.S. duck stamp sales and breeding population size of the 10 principal duck species from 1955-2008. Inset reflects Canada Migratory Game Bird Hunting Permit sales from 1966-2008. Stamp sales (an index of duck hunter numbers) were closely correlated with duck population size until the mid-1990s, after which stamp sales did not rebound commensurate with populations. The loss of Canadian waterfowl hunters is even greater than in the U.S., with permit sales declining from over 500,000 in 1979 to fewer than 180,000 in 2008. Sources: U.S. Fish and Wildlife Service and Canadian Wildlife Service.

access to hunting areas. Unfortunately, the management community did not undertake social science research to inform these hypotheses, despite a growing concern over declining duck stamp sales and loss of revenue used to fund waterfowl habitat conservation.

While the management community has long recognized the interdependencies between harvest and habitat management, we continue to have a poor understanding of the linkages between harvest and habitat management decisions and outcomes such as participation rates and satisfaction levels of hunters and other citizens who enjoy waterfowl and wetlands. Most managers continue to assume that functional relationships exist between stakeholder satisfaction and easily measured aspects of the managed system, such as waterfowl population size or liberal harvest regulations.

It is now apparent that the old paradigm – abundant waterfowl and liberal regulations will result in more hunters – no longer holds. The two main tools in the tool box for waterfowl management, habitat management and harvest regulations, have been ineffective at reversing the general decline in hunters. In fact, the ominous trend in hunter numbers continues despite abundant waterfowl populations and over a decade of unprecedented hunting opportunity. U.S. waterfowl hunters have decreased 27% since the decade of the 1970s, and continue to decline (Fig. 1). Canadian waterfowl hunter numbers decreased 55% during the same period, and now have appeared to stabilize. The loss of hunters, and the growing disconnect between people and the outdoors, demands new efforts focused on consumers of the waterfowl resource.

In contrast to the decreasing numbers of hunters, other parts of society who recognize the value of waterfowl and wetlands, including governments and citizens-at-large, are gaining in numbers and importance to the Plan. For example, some 15 million people in the U.S. travel a mile or more to view waterfowl<sup>10</sup>, and their numbers are growing.

**The two main tools in the tool box for waterfowl management, habitat management and harvest regulations, have been ineffective at reversing the decline in hunter numbers.**

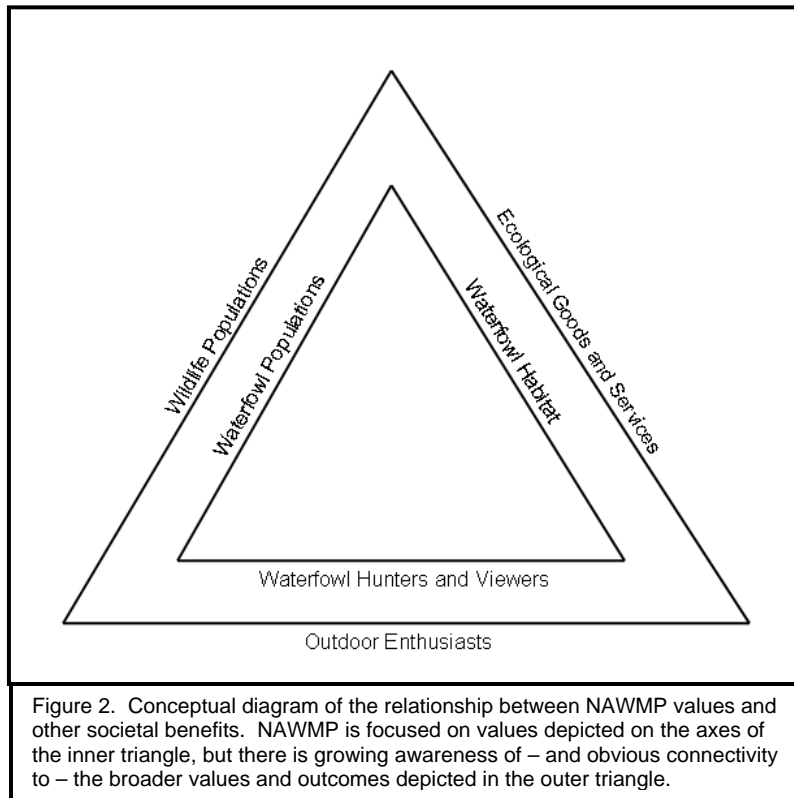
A holistic approach, first to understanding and then promoting hunter and viewer recruitment and retention rates, should be embraced. We need to better understand and address social factors that affect participation along with the possible roles that habitat management and the size of waterfowl populations may play in affecting these rates.

In addition, practices that conserve wetlands and associated waterfowl habitats are being more widely recognized for enhancing water quality and quantity, promoting biodiversity, sequestering carbon, and providing numerous other environmental benefits. These “ecological services” are of substantial, and increasing, value to society. In some parts of the continent, particularly in regions of Canada, recognition of these ecological services drives public policies and provides funding in support of wetland conservation. In this context, contemporary waterfowl management is enlarging the group of constituents who contribute to – and benefit

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<sup>10</sup> Carver, E. 2009. Birding in the United States: A demographic and economic analysis. U.S. Fish and Wildlife Service Report 2006-4.

from – our work (Fig. 2). This offers the potential for expanded support of our conservation programs, albeit for reasons mostly other than sustaining waterfowl populations. NAWMP clearly offers a broad value proposition to society.



### **Adapting to Change and Improving Management Performance**

We pursue our waterfowl and wetland conservation work in a world of rapid and multi-faceted change – economic, social, and ecological change, among others. Constant change challenges the foundation of any business model, and waterfowl management is no exception. Although waterfowl conservation has evolved in the past century, much of our business is being pursued under more-or-less the same model that evolved with the advent of

the NAWMP and NAWCA more than a quarter-century ago. Since that time we have experienced:

- Less local control over production systems, land use and the economy that affects both our conservation business and the economics and policies of land use. Global forces of supply and demand for food, fiber, and biofuels fundamentally affect the availability of land for conservation.
- Ecological change, including the very large human impact on ecosystems vital to waterfowl throughout their annual cycle. For some species of concern like scaup, black ducks and northern pintails, there is evidence that habitat carrying capacity has been substantially reduced.
- Climate change, which is particularly vexing because its effects are inherently long-term and large-scale, yet unpredictable. For ducks, hydrological changes in prairie wetlands may have profound implications, as might changes in prairie agriculture, water-level changes in the Great Lakes, sea-level rise in coastal marshes, and changes in the ecology of permafrost ponds in the north.
- Social and demographic change, including the continuing urbanization of North Americans, which is creating generations of citizens that are increasingly disconnected from the outdoors and our rich wildlife resources. Competition for the attention of young people is particularly

acute; the newest generation of North American's is more estranged from nature than ever before.

- Increased energy consumption, which has led to new policies that drive increases in domestic production. Oil, gas and coal developments are having profound, direct impacts on boreal, arctic, coastal and even prairie ecosystems, and other landscape impacts are mounting as society seeks alternatives via wind energy developments, hydroelectric projects, and biofuel production.
- A succession of financial crises, creating massive debt that is resulting in substantial cutbacks in government programs and reduced philanthropic donations to causes like waterfowl conservation. Investing is becoming more parochial, challenging our ability to address needs of a migratory resource where the most strategic investments may lie in sparsely populated regions of the continent.

**"The biggest single threat to conservation in America is the growing disconnect of our people with the outdoors."**

Ken Salazar,  
U.S. Secretary of the Interior,

Clearly, waterfowl and wetland conservation is operating today in a world that is vastly different than when we first embraced the goals, strategies and financial partnerships of the Plan.

Waterfowl hunters have been the most ardent supporters of waterfowl conservation, but the time has come to motivate a broader section of society to join in the conservation cause. As we do this, we must also examine all parts of our enterprise, assess if what we are doing today is as effective and cost-efficient as possible, and re-position ourselves for the future.

*Improving Management Performance* -- A hallmark of North American waterfowl management has been the continual improvement of our management programs. Our ongoing quest for a better way of doing business has motivated the management community to invest in original research, or synthesize existing data, to inform waterfowl management. For example, the NAWMP Assessment reviewed JV conservation programs and offered numerous, specific recommendations for improving the effectiveness and efficiency of Plan activities. In the harvest management community, the U.S. Supplemental Environmental Impact Statement (SEIS) on hunting of waterfowl – out for public review at the time of this writing – is undertaking a thorough re-examination of harvest management in the U.S. The National Duck Hunter Survey, conducted in late 2005, was the first to ask duck hunters in every state their perceptions on duck hunting and waterfowl management. The results of these efforts shed valuable light on the question of whether we are “doing things right” in waterfowl management.

In addition to considering the effectiveness of existing management programs, we have frequently re-balanced our programmatic investments by asking, “are we doing the rights things and in the right places?” Such re-balancing may be catalyzed by significant new information, the invention of new planning tools, or external forces that place new pressures on populations or habitats. For example, when new research revealed low duck nest survival in fragmented prairie landscapes with little upland cover, managers shifted resources to securing larger tracts of grasslands through conservation easements. Coincidental with this biological finding was the advent of geographic information system (GIS) computer software that greatly enhanced our

spatial targeting of conservation programs, leading to expanded work in some geographic areas and reduced emphasis in others. Finally, policy changes for the better (e.g., advent of the U.S. Conservation Reserve Program) or for the worse (e.g., loss of protection for isolated wetlands under the U.S. Clean Water Act) have prompted us to re-align staffing and financial resources to capitalize on opportunities or respond to new threats.

Lastly, there have been periods in the history of waterfowl management when we enacted significant changes by adopting new value systems, embracing new paradigms, and realigning our governance and institutions. The very beginnings of waterfowl management in North America witnessed a fundamental transformation – from regarding waterfowl as a market-based commodity to a public trust. Subsequently, landscape-scale conservation in the U.S. was transformed by the creation of the National Wildlife Refuge System. Collaborative harvest management was transformed through the Flyway System. Non-governmental conservation organizations like Ducks Unlimited were founded, bringing with them new expertise and private funding for conservation. Finally, the NAWMP and associated formation of the JVs transformed partnership-based, landscape-level conservation. More than anything else, the willingness of the waterfowl management community to consider and implement these fundamental changes is what sets it apart from many other endeavors in wildlife management.

We find ourselves once again at this outermost loop in the learning cycle, asking “do we have the governance right?”. To adapt and move forward, we must again reconsider our management frameworks and institutional structures as we integrate the elements of waterfowl management and more explicitly incorporate human objectives into our decision-making processes.

*Adaptive Management: “Learning While Doing”*— Traditionally, we have resolved key uncertainties using a hypothesis testing framework. This “directed research” has resulted in significant advances in our understanding of waterfowl ecology. That knowledge has, in turn, been translated into improved management techniques and enhanced targeting of conservation efforts. However, given the myriad changes described earlier – and the rate at which those changes are occurring – managers are increasingly forced to make decisions before directed research can provide new knowledge. These management choices are usually made in the face of considerable uncertainty. In such a situation, an “adaptive management” framework, wherein managers “learn by doing” in a structured way, is a preferred approach. Indeed, the merits of an adaptive management approach were the focus of the 2004 Update to the Plan.

Improving management performance through an iterative process of planning, implementation, and evaluation is the hallmark of adaptive management. In its simplest form, managers design conservation activities to impact waterfowl populations, but they also create opportunities for learning to ensure that future management decisions are well informed. This approach can be particularly powerful if management actions can be designed specifically to test two or more competing management hypotheses.

To manage adaptively and make effective conservation decisions, waterfowl managers and stakeholders must be able to articulate clear goals and quantifiable objectives; predict the

biological outcomes of management actions; design and implement monitoring procedures to measure those outcomes; and compare outcomes with the original predictions and objectives. Knowledge gained during one cycle is then used to adjust future planning and implementation in the next cycle.

In this setting of substantial uncertainty, this Revision seeks to establish a new chapter in North American waterfowl management to meet the new threats posed by the loss of hunters, the increasing pace of social and environmental change, and continued pressures faced by waterfowl populations and their habitats. It challenges the waterfowl management community to engage a larger constituency in the cause of wetland conservation; confront current assumptions about the linkages among waterfowl population management, habitat conservation, hunter participation and support for conservation; and to address these issues in a coordinated way.

### **A Vision for Integrated Waterfowl Management**

North American waterfowl management is an inter-related enterprise involving hunters and others who fund or advocate for public funding of conservation programs, resulting in waterfowl populations that can sustain an annual harvest while providing other societal benefits. Yet we do not have a management system with a comparable level of integration. This hinders our efficiency and effectiveness, and impedes our ability to adapt our programs in response to changes in ecological systems and society.

It is also increasingly evident that many challenges of contemporary waterfowl conservation could be more effectively addressed with greater forethought, planning and facilitation. We must – and can – do better at translating public values and interests into explicit, clear objectives that are shared across waterfowl management initiatives. For example, the ongoing loss of hunters – our core constituency – might be partially addressed by more formally incorporating explicit hunter recruitment and retention objectives into our management programs. Moreover, enhanced monitoring and assessment systems could help us better understand ecological changes and enhance our ability to predict the outcomes of our management actions. If we were to frame these interrelated decision problems more explicitly, tradeoffs and cross-scale linkages may become more evident. These are but a few examples of the gains that can be achieved if we adopt a more integrated and holistic way of doing business.

The extensive consultation conducted to inform this Revision, along with the Assessment and Joint Task Group reports, provide a renewed and clearer understanding that the future of waterfowl management is depends on achieving habitat, population, and user goals. Further, it has become apparent that resource allocation decisions for monitoring, regulatory rule-making, and habitat conservation should flow as part of a comprehensive, coordinated, and prioritized effort rather than from a competitive and opportunistic process. Systematic prioritization does not occur now because the components of waterfowl management are not viewed as an integrated whole, and decisions in one arena (e.g., harvest management) are often not linked to decisions in other endeavors (e.g., habitat conservation).



**Resource allocation decisions for monitoring, regulatory rule-making, and habitat conservation should flow as part of a comprehensive, coordinated, and prioritized effort rather than from a competitive and opportunistic process.**

This Revision advocates for the development of an integrated system of waterfowl conservation that features coherent and quantifiable objectives to guide habitat and population management. Focused on social as well as ecological

landscapes, this fully coherent management system would feature:

- **Quantifiable objectives established in support of the goals, for which we can prescribe actions and predict outcomes.** The new goals of NAWMP provide the context for developing explicit objectives that are measurable and provide unambiguous guidance to decision makers. Initially, managers must translate the qualitative goal statements developed during consultations into higher-order, quantitative, and measurable objectives for populations, habitats, and primary stakeholders.
- **An overarching framework, supported by linked models, which enables managers to understand and balance tradeoffs among the goals and objectives.** Tradeoffs are inevitable and must be recognized through formal processes to value and weight objectives. Hard choices will need to be made, often involving different institutions that are not accustomed to collaborative decision-making. Managers must develop a feasible suite of actions, carefully considering – and subsequently evaluating – how those actions affect the attainment of each of the objectives adopted by the management community.
- **A system that links objectives and ensures coherence across focus area, Joint Venture, and continental scales.** An enterprise as vast as the conservation and management of North America's landscapes, waterfowl populations, and user/supporters involves numerous decision problems at multiple temporal, geographic, and jurisdictional scales. Decisions cannot be guided by one overarching model.
- **An inter-related set of decision models that managers can use to efficiently allocate resources to achieve the objectives, recognizing that a single model will not be adequate to encompass all decisions.** Implementing an integrated management framework will require thoughtful development of models that predict outcomes of management actions. Some underlying models will be well-informed with empirical data. Other models may be more theoretical, but nonetheless empirically based. Several models may be exploratory in nature, developed in an adaptive management framework that evaluates alternative hypotheses as management decisions are implemented. Over time, these models should improve to the point that empirically-based models that most accurately predict expected outcomes emerge and become the operational standard.
- **Monitoring systems that track progress towards objectives and enable a comparison between observed versus predicted outcomes.** As models that predict most accurately are

identified, their influence in future decision-making should increase. Monitoring should be targeted and focused on the key parameters most useful for resolving decision problems, and on metrics that are most useful for detecting changes in ecological systems and societal trends that bear on waterfowl management.

- **Institutional and cultural changes to facilitate an integrated management system.** In general, the form of institutions and decision processes should evolve to allow the functions of the integrated system to work smoothly. Sometimes, however, it may be necessary for institutional change to precede the development of a new framework, in order to create the necessary environment for change.

A coherent framework would be invaluable in helping guide the allocation of human and financial resources in waterfowl management. Such decisions typically are made at multiple scales – local, regional, state and provincial, national and international – and developing the means to inform such decisions at all these levels will take time and both technical and administrative support.

What would be the costs to develop and implement such a system? Admittedly, the net costs are difficult to estimate without knowing the details of the integrated framework. Development of a Human Dimensions Working Group (to inform goal #3) will take incremental resources, since no such institution exists at present. In addition, technical staff resources will be needed to develop models in support of an integrated system of waterfowl management. However, once this work is completed, one would expect offsetting gains in efficiency resulting from enhanced targeting of our conservation actions and a streamlining of administrative decisions. Monitoring and assessment are important features of an integrated system. However, it is anticipated that such a system will not require a net increase in monitoring efforts but rather a possible redirection of existing monitoring commitments. As the framework for an integrated system develops and institutional changes are proposed, cost estimates should evolve and be evaluated.

### **Institutional Support and Leadership for Integrated Waterfowl Management**

Although technically demanding, the challenges of developing explicit integrated objectives and linked decision processes may be less daunting than eliminating institutional barriers to integration. Integration, or the simultaneous consideration of population, habitat, and user objectives, will often – but not always – be critical in management decisions. Identification of management decisions requiring integration across objectives, as well as the key decision makers who need to be involved, should inform deliberations over the most effective institutional structures and processes.

*Current State* – Waterfowl conservation includes entities focused on population management (NFC, Flyway Councils, Service Regulations Committee, and Harvest Management Working Group [HMPWG]), habitat management (NAWMP PC, JVs, North American Wetlands Conservation Councils [NAWCC], National Fish and Wildlife Refuge System, NAWMP Science



Support Team [NSST]) and some that do both (State and Provincial Wildlife Agencies). Each institution has very different rules of governance, procedures, and funding sources, reflecting among other things different roles for government agencies and the private sector in population versus land management. Flyways are centralized, with administrative decisions flowing in a hierarchical fashion from state-led technical committees, to state-led Councils, to the U.S. Fish and Wildlife Service (USFWS) and Canadian Wildlife Service (CWS). Hunters are the primary stakeholders, but only indirectly or implicitly involved, and funding is shared between state and federal agencies.

In contrast, habitat management is decentralized, with JVs operating relatively autonomously, answering to more diverse stakeholders and accessing varied sources of funding. Federal governments, states, provinces, and NGOs play various roles on JV Management Boards and Science Teams, depending on the JV. Coordination between nations on matters of population and habitat management are mostly *ad hoc* as issues of bilateral importance arise and are not, in most cases, a formal step in reaching consensus decisions.

Finally, institutional support for expanding work in human dimensions has just begun to take shape. We need to facilitate the development and application of social and economic sciences to waterfowl management, and achieve essential integration with the work of waterfowl population and habitat managers.

Each of our institutions was established primarily to achieve single objectives (i.e., Flyways for population management, JVs for habitat conservation). Given the multiple and interrelated objectives now identified by the waterfowl management community, the time is right to re-evaluate our ways of doing business. In particular, we must:

- Determine whether our existing institutions adequately represent the appropriate stakeholder groups.
- Consider whether alternative funding arrangements may be desirable.
- Evaluate whether agencies and NGOs are appropriately engaged in various decision-making processes.
- Reflect on whether our existing bureaucracies have the capacity to integrate elements of the other two goals into their management actions.

While evaluating the efficiency and effectiveness of existing institutions, the waterfowl management community should consider arrangements that may facilitate a more integrated approach. Inefficiencies are readily apparent. As waterfowl management has evolved, states and local land managers now find they must coordinate their habitat and harvest management with multiple bureaucracies. States include as many as five JVs within their boundaries, and some states and provinces belong to multiple administrative Flyways. And even though hunter demographics and harvest management have changed dramatically since the Flyway system originated in 1952, we continue to manage harvest with little change in these jurisdictions. The new USFWS Landscape Conservation Cooperatives have added yet another organizational layer to landscape and population management  

It is interesting to reflect that over the last decade, considerable conceptual progress in waterfowl management required the creation of various *ad hoc* integrated teams (e.g., AHM Task Force, HD Working Group, Joint Task Group, Northern Pintail Action Group, Scaup Action Team, 2008 Waterfowl Summit) that pulled together members from the NSST, JVs, Flyways, and other institutions. This happened because adequate progress was not being made strictly within our traditional management “silos”. But such teams are seldom adequately supported, and maintaining momentum when their reports have been written is difficult. It seems possible that alternative arrangements of our management processes and institutions may be more desirable, and may allow managers to devote more limited staff and financial resources to conservation programs than to meetings and burgeoning processes.

*Moving Forward* – The Joint Task Group (also see NAWMP Action Plan Table 1) clearly recognized that no existing technical body with expertise in both habitat science (e.g., the NSST) and harvest science (e.g., the AHM Working Group) existed to carry on the work started by the JTG. They further observed that no single management forum exists for integrating policy options across habitat and harvest dimensions and across national boundaries.

Two process challenges, both central to the quest for integration, illustrate the general point:

First, assuming that a technical decision framework is developed that allows us to trade off multiple objectives, how might we go about actually setting such multiple objectives for waterfowl management (i.e., by what *social process* could we proceed)? Here, the term “social process” is used to broaden the discussion beyond purely technical matters. Can we rely on existing institutions and processes to achieve coherent adaptive actions, or might we need some new overarching facilitation or coordination functions? If something more is needed, what form should that take?

Second, when a set of coherent objectives is established, again from a *process* point of view, how will we monitor progress toward achieving the expanded NAWMP objectives and adapt our actions in light of those results? Who will “own” the expanded set of objectives? If it is multiple institutions, how will they coordinate actions in pursuit of those objectives, and who will monitor performance measures?

The problem, which becomes immediately apparent, is that no existing entity possesses clear responsibility for the interrelated decision problems we are trying to define and address in this revision of the Plan.

There is no single institution to determine who will participate in the development of objectives, what stakeholders will be consulted, what

**The problem ... is that no existing entity possesses clear responsibility for the interrelated decision problems we are trying to define and address in this revision of the Plan.**

technical resources will be committed to the task, and – ultimately – who will make the relevant decisions, monitor progress, and adapt the system in the future as required. The management

community should attempt to resolve these issues with respect for the long-standing institutions and processes already in existence.

Based in part on the ideas that surfaced during the NAWMP consultations, this Revision offers the following as a basis for discussions by the waterfowl management community.

*Immediate Interim Adjustments* -- As an initial step to maintain momentum for achieving greater coherence and integration of waterfowl management, the PC will assume an interim facilitation role and work with other authorities to create an interim “Integration Technical Team” (ITT) that will be tasked with continuing the work outlined in this Revision and a companion Action Plan (under development). Critically, the ITT will represent and include participants from the Harvest Management Working Group, the NAWMP Science Support Team and the still-forming Human Dimensions Working Group. Whether this interim team – drawing members from all three of these technical support bodies – remains for the longer term or evolves into something else will need to be resolved as work on the Action Plan unfolds. Regardless, it will be essential for the waterfowl management community to have enhanced access to advice from the combined expertise of these technical groups.

We do not recommend delegating additional authority to the PC from the federal governments or elsewhere at this stage. Rather, we envision creating a focal point for reaching consensus around integrated goals and providing a forum for the review of monitoring and assessment data bearing on progress toward the Plan’s multiple goals and objectives. Warranted changes in program direction, emphasis, or monitoring/assessment would be identified as they emerge, and appropriate agencies urged to act in a unified manner.

We suggest that final decisions regarding structures and processes to facilitate integrated decision-making be deferred for a few years until the waterfowl management community has gained some experience in developing and implementing the framework and we can reflect on what we’ve learned. Learning how to conduct integrated management should be a high-priority, over-arching objective for the first few years following completion of the 2012 Revision.

*Longer-Term Solutions* – When we have succeeded in setting more explicit multiple objectives and designing the essential linked decision frameworks and monitoring systems advocated in this Revision, we recommend that the three federal governments then consider more comprehensive changes in processes and/or institutions to ensure future success of integrated waterfowl management.

The federal governments of Canada, the United States and Mexico have over-arching management authority over migratory birds and treaty responsibilities to ensure those populations are managed sustainably. The combined federal agencies should lead a review of progress made toward attaining new Plan objectives under all three goals and determine how effective the interim processes and institutions have been for achieving integrated waterfowl management. They should also review progress in understanding functional linkages and the dynamics of the interacting human, avian and habitat systems that we are attempting to manage,

and the waterfowl management community's effectiveness, efficiency and responsiveness to change.

One long-term solution might include a fundamental reinvention of the PC itself. The North American Waterfowl Management PC is an international body, created by the federal governments in 1986 to provide leadership and oversight for the activities undertaken in support of the Plan. The original and evolved role for the PC is to steward the Plan, with two main overarching responsibilities: (1) serve as keepers of the vision, mission, principles and objectives of the NAWMP; and (2) provide leadership for Plan success.

More than any other existing body, the PC owns the Plan's goals and objectives and should be stewarding these for the waterfowl management community. If the Plan Revision now embraces a new and broader set of goals and objectives, then arguably the PC should either evolve to accept the stewardship of those linked goals or transfer ownership of those goals to some new waterfowl management facilitation entity. It is probably premature to make such changes now, but rather address them when the waterfowl community has gained greater experience with working on a set of integrated goals and objectives.

Regardless of the precise form this new body might take, we believe that to serve an effective facilitation role for an expanded vision of integrated waterfowl management, connections with the following institutions will be essential:

- USFWS, CWS and SEMARNAT (Mexico)
- The Flyway Councils in the U.S.
- The North American Wetlands Conservation Councils (NAWCC) in the U.S. and Canada. .
- The NAWMP JVs
- Technical linkages to:
  - NAWMP Science Support Team (NSST)
  - Harvest Management Working Group (HMGW)
  - Human Dimensions Working Group (HDWG)

### **Summary of Recommendations**

As was the case with the original NAWMP, this Revision proposes new actions and a new vision for waterfowl management, recognizing that implementation will occur only if the ideas herein are sufficiently compelling to move the management community to action. The PC believes that actions must be taken to: 1) facilitate integration, 2) increase adaptive capacity, and 3) explicitly confront the changing social landscape. This "re-vision" illuminates a path forward for a more integrated, adaptable approach to waterfowl conservation that will meet the challenges posed by rapidly changing ecological and social landscapes.

### Facilitate Integration

*Adopt common goals* – An extensive consultation process has led to the formulation of three goals for waterfowl management described in this Revision. Embracing these as common goals will help unify the waterfowl management enterprise.

*Adopt the vision of an integrated enterprise* – The need for an integrated management system is apparent. There are substantial benefits to working towards common objectives within a framework that will enable us to acknowledge and balance trade-offs among objectives and actions.

*Actively manage the linkages within waterfowl management* – The linkages among waterfowl populations, habitats and users/supporters are vital to the functioning of our enterprise. They must be actively managed with the same level of forethought and planning as we employ to achieve the goals themselves.

### Increase Adaptive Capacity

*Embrace the imperative for change and adapt accordingly* – The manifold changes affecting waterfowl management are overwhelming our current approaches to conservation. We must continue to develop management frameworks that acknowledge these changes, and adapt accordingly to sustain waterfowl, their habitats and a responsive waterfowl management enterprise.

*Continue to improve our management performance* – Numerous advancements have been made by posing – and answering – the basic question of, “are we doing things right”? More significant change has resulted from asking ourselves, “are we doing the right things”? We are now at a juncture where we need to address even higher-order questions: do we have the proper decision-making tools, institutions and governance to accomplish our goals?

*Establish a process for institutional review and change* – Ideally, institutions evolve to enable management systems to function efficiently. However, sometimes institutional change must help lead the way towards a better approach of doing business. This Revision is intended to prompt the management community to actively consider appropriate institutional changes to enable an integrated system.

### Confront the Changing Social Landscape

*Increase our institutional capacity to address the changing social landscape* – An essential first step will be to establish a Human Dimensions Working Group for waterfowl management. An HDWG will provide the necessary expertise to accomplish the third goal of this Plan – growing the number of waterfowl hunters, other conservationists, and citizens who enjoy and actively support waterfowl and wetlands conservation. Linkages to the HMWG and NSST through the new Integration Technical Team will be essential.



*Motivate others to join the cause* – As we consider how we position waterfowl management for the future, we must also commit ourselves to enlarging our base of supporters. For decades, waterfowl hunters have provided the financial and political foundation for waterfowl conservation. It is time to motivate a broader segment of society to participate in this cause. Such engagement should not come at a cost to waterfowl hunting, but rather provide value-added benefits in the form of progressive public policies and enhanced funding for conservation.

### **Next Steps**

Listed below are ten steps necessary to achieve a fully integrated and efficient waterfowl management enterprise. Additional guidance, including proposed timelines, will be offered in the companion NAWMP Action Plan.

1. The PC will serve in an interim role to facilitate the development of measurable objectives under the population, habitat and user/supporter goals, and to ensure progress in the development of a linked decision framework necessary to attain these goals.
2. The PC, in consultation with the USFWS, CWS, NFC, and others, will establish an interim Integration Technical Team (ITT). The ITT will work under the direction of the PC and in close coordination with the USFWS, CWS, the NFC and other entities who will commit to supporting the work of the Team.
3. The ITT will be charged to: (i) recommend metrics used to specify population, habitat and user/supporter objectives; (ii) develop a structured framework to incorporate biological and social models related to user objectives; (iii) revise and integrate continental population and habitat objectives; (iv) provide a broadly agreed upon tool to evaluate tradeoffs among population, habitat, and user objectives when addressing resource allocation decisions at continental scales; (v) recommend how to apply this technical framework in the face of challenges for simultaneous management of multiple species and stocks; and (vi) identify scale-specific monitoring needs to implement the linked decision framework and associated models for population, habitat, and user/supporter management.
4. The pilot efforts to develop cross-scale, linked models to support integrated decision making for pintails, scaup, and black ducks should be completed and used to inform the development of revised continental objectives for those species. As these mature, the ITT and involved JVs should identify decision problems at regional or smaller scales and construct the spatially explicit models needed to inform decision-making at those scales. These models should also provide linkages to the models developed for decisions at larger scales, and for multiple species.
5. Social models to support multi-scale decision making for waterfowl hunters and other users should be developed and/or refined by the HDWG, working closely with the ITT.

6. Once an integrated framework is in place and linked biological and social models are operational, the PC will coordinate with the USFWS, CWS, NFC, JVs, and others to revise continental population, habitat, and user/supporter objectives.
7. Using existing administrative processes and structures, the USFWS, CWS, and NFC will incorporate the revised continental modeling framework, along with relevant models, into processes used to establish waterfowl harvest regulations in each nation.
8. When the nature of the integrated technical framework is better defined, the lead federal agencies (USFWS, CWS, SEMARNAT) will coordinate a comprehensive, inclusive, international review of the institutional structures and processes in place to support integrated waterfowl management; form recommendations for any necessary restructuring; and consult comprehensively with the waterfowl management community to build consensus and support for such changes.
9. The ITT and PC will assist this review by evaluating progress toward attaining Plan objectives under all three goals, reviewing the progress in developing linked decision processes, and evaluating support from diverse user groups.
10. The PC, or potentially a restructured oversight body for Integrated Waterfowl Management, will initiate the next update to the Plan. That update will review progress since 2012 and articulate a refined, comprehensive international plan for integrated management of waterfowl populations and harvest, waterfowl habitat, and user/support growth.

### **Conclusions**

This revised Plan and associated vision for integrated waterfowl management is a natural step in the evolution of waterfowl management. Our community has never been reluctant to consider and implement better ways of doing business, an attitude that has successfully conserved waterfowl populations and kept waterfowl management at the forefront of the conservation profession. The need for change again is apparent. The technical tools are available to develop new systems in a structured manner. The resulting gains in efficiency, accomplished in part by objectively balancing trade-offs, could not come at a better time.

This revised North American Waterfowl Management Plan has a renewed purpose and provides the impetus to develop an integrated management enterprise. A companion Action Plan, currently under development, will provide greater detail concerning the tasks that will be required and the entities that need to engage in the process. There will undoubtedly be technical challenges and numerous uncertainties, many of which can be informed (in time) if we further embrace an adaptive management approach to learning. Creating an integrated system of waterfowl management will be a process, not a singular event. Now is the time to commit to the task.

## Appendix A

### Acronyms Used in this Plan

#### Acronyms - North American Waterfowl Management Plan

AHM	Adaptive Harvest Management
AP	NAWMP Revision Action Plan
CRP	Conservation Reserve Program
CWS	Canadian Wildlife Service
EC	Environment Canada
FWC	Flyway Council
GIS	Geographic Information Systems
HD	Human Dimensions
HDWG	Human Dimensions Working Group
HMWG	Harvest Management Working Group (formerly AHMWG - Adaptive Harvest Management Working Group)
ITT	Integration Technical Team
JTG	Joint Task Group
JV	Joint Venture
NAWCA	North American Wetlands Conservation Act
NAWCC	North American Wetlands Conservation Council
NAWMP	North American Waterfowl Management Plan
NFC	National Flyway Council
NGO	Non-governmental Organization
NSST	NAWMP Science Support Team
PC	NAWMP Plan Committee
RSC	Revision Steering Committee
SEMARNAT	Secretaria de Medio Ambiente Y Recursos Naturales, Mexico
U.S. SEIS	U.S. Supplemental Environmental Impact Statement
USFWS	United States Fish and Wildlife Service
WMI	Wildlife Management Institute

## Appendix B

### North American Waterfowl Population Status and Interim Abundance Objectives

From the beginning the NAWMP has relied on waterfowl population objectives to guide conservation actions, particularly within the JVs. As part of developing an integrated management system, population objectives should be set in the context of simultaneously achieving multiple goals. For example, the community should consider the population size necessary to achieve the desired level of hunting recreation and other uses, along with the plausibility of providing populations of that magnitude given the habitat needed to sustain the birds. Informing new population objectives in this way will be a necessary, early step in the development of an integrated management system. However, until such analyses occur, the population objectives established in the 1986 NAWMP should continue to guide waterfowl management. Those interim objectives are provided here, along with current population estimates and recent (decadal) trends.

Population objectives serve three primary purposes in conservation planning: 1) they provide a biological target and plan foundation, 2) they function as a performance measure for assessing conservation accomplishments, and 3) they operate as a communication and marketing tool to demonstrate the need for conservation. The currency of population objectives may be any demographic parameter such as abundance, density, or a vital rate. In the past, limited biological information restricted expression of NAWMP objectives to population size. Ongoing and future work by the waterfowl conservation community may result in different expressions of waterfowl population objectives, particularly as waterfowl scientists move toward use of annual cycle models in objective setting.

Population abundance objectives for 10 common duck species in the Traditional Survey Area (TSA; Appendix figure 1) are provided in Table 1. These objectives are based on 1970s abundances, and the objective of a “traditional” distribution of waterfowl during various life-cycle periods was also retained. Objectives for four duck species occurring outside the TSA were included in earlier versions of the Plan and they are also provided here (Table 1). Continental population estimates for all duck species were developed using a variety of survey data (Table 2). Population status for North American geese (Table 3) and swans (Table 4) are also provided, and abundance objectives from earlier Plan versions retained.

Some habitat JVs have generated additional regional breeding population abundance objectives outside the TSA and the Sea Duck JV has developed interim abundance objectives for many populations/subpopulations of sea ducks. These potential additions and adjustments to duck abundance objectives were not included in the Plan Revision but will be part of the future population objectives assessment.

We include a “population trend” column to be consistent with earlier versions of the NAWMP and because members of the Plan community have expressed interest in knowing the general patterns of increase or decline in waterfowl populations over the past decade. However, we

strongly caution against inferring too much from these patterns, given the cyclic nature of waterfowl populations and the importance of considering population data in the full context of background environmental variation. In highly variable and unpredictable environments such as experienced by many North American waterfowl, trend data may be uninformative or even misleading. A task for the ITT over the next few years will be to provide a more thoughtful and careful analysis of waterfowl population dynamics to be used in setting and monitoring success in meeting population objectives.

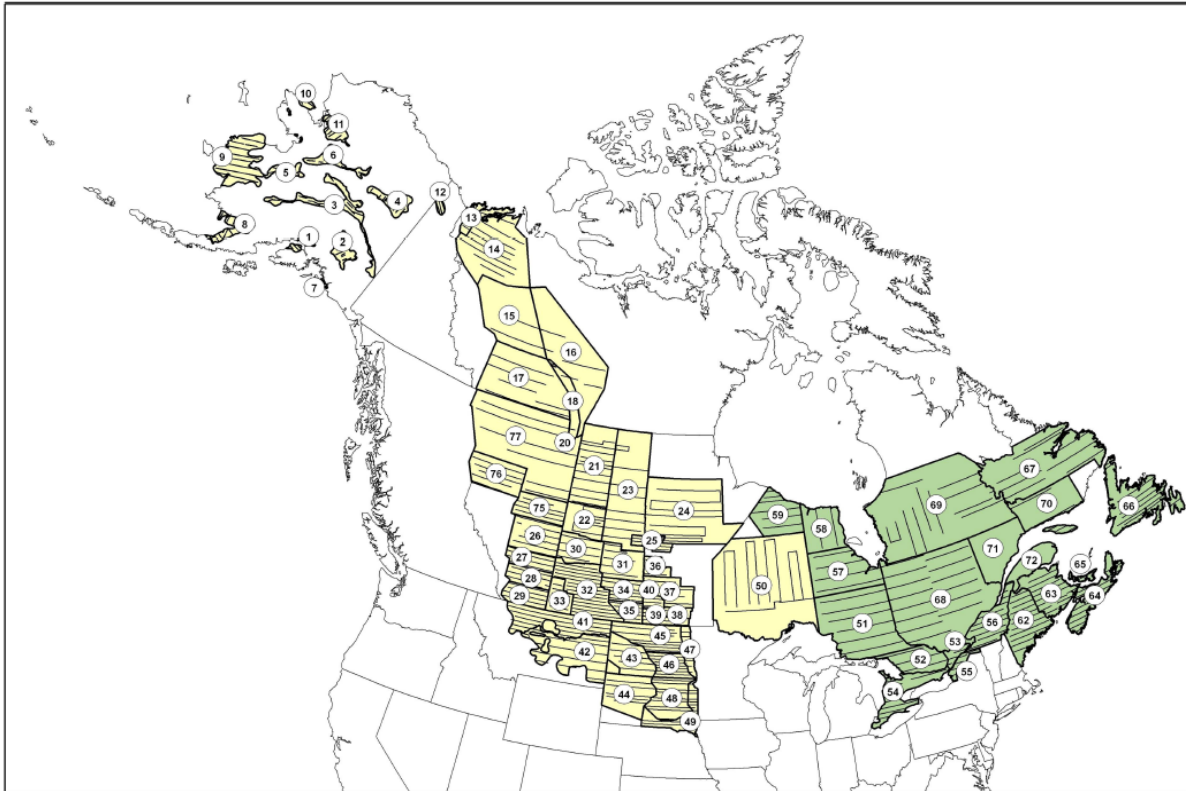


Figure 1: Strata and transects of the Waterfowl Breeding Population and Habitat Survey (yellow = traditional survey area, green = eastern survey area).

Table 1. Breeding population objectives and status of North American ducks (1,000s of ducks).

Breeding Geography and Species/Subspecies	Objective <sup>a</sup>	Population Status	
		Mean (2001-2010)	Trend (1970-2010)
TRADITIONAL SURVEY AREA			
Mallard	8,200	7,779	No trend
Northern pintail	5,600	2,846	Decreasing
Gadwall	1,500	2,717	Increasing
American wigeon	3,000	2,199	Decreasing
Green-winged teal	1,900	2,752	Increasing
Blue-winged and cinnamon teal	4,700	5,706	Increasing
Northern shoveler	2,000	3,613	Increasing
Redhead	640	793	Increasing
Canvasback	540	597	No trend
Lesser and greater scaup	6,300	3,640	Decreasing
OTHER SURVEY AREAS			
American black duck	640 <sup>b</sup>	494	No trend <sup>c</sup>
Mottled duck, Florida subspecies <sup>d</sup>	9.4 <sup>e</sup>	40 <sup>e</sup>	Increasing
Hawaiian duck <sup>d,f</sup>	5		
Laysan duck <sup>d,f</sup>	10.5		

<sup>a</sup> Duck objectives are based on the Waterfowl Breeding Population and Habitat Survey, Traditional Survey Area (WBPHS-TSA) strata 1-18, 20-50, 75-77 and represent average population estimates from 1970-1979 unless otherwise noted.

<sup>b</sup> The American black duck population objective was developed from predictions of a model relating mid-winter Waterfowl Survey counts to population estimates derived from the Breeding Waterfowl Plot Survey (BWPS) of Eastern Canada. The objective, and average population size, corresponds to that portion of the black duck breeding range sampled during the BWPS. For management purposes, the black duck objective has been partitioned for three portion of the breeding range: eastern, central, and western. In the future, combined estimates from spring fixed-wing and helicopter surveys may be used for population objective-setting.

<sup>c</sup> American black duck population trend based on eastern survey area results from 1990-2010.

<sup>d</sup> Not shared between two or more signatory nations. Management is the responsibility of that nation whose boundary coincides with the range of the species, population, or subspecies.

<sup>e</sup> The mottled duck Florida subspecies objective corresponds to that portion of the breeding range of this subspecies sampled by the Florida Mottled Duck Survey. The objective for the Florida subspecies of the mottled duck is based on average population estimates from 1985 to 1989. Mean population size is for the time period 2002-2009.

<sup>f</sup> Hawaiian and Laysan ducks are monitored by the Annual Hawaiian Waterbird Survey. Mean population estimates correspond to the years (TBD based on data availability).

Table 2. Breeding duck population estimates and trends in North America (1,000s of ducks).  
(Note: this table is under development)

Species/Subspecies/Population <sup>b</sup>	Population Status <sup>a</sup> (2001-2010 mean)			Trend (1970-2010)
	Continental	Traditional Survey Area <sup>c</sup>	Other Survey Areas <sup>d</sup>	
Mallard	11,700	7,779	2,496	
Mexican duck <sup>e</sup>		Not Applicable	Not Applicable	No trend
Northern pintail	3,640	2,846		Decreasing
American black duck	920	31	494	No trend
Mottled duck		Not Applicable	Not Applicable	
Florida subspecies <sup>e</sup>	40	Not Applicable	Not Applicable	
Western Gulf Coast subspecies		Not Applicable	Not Applicable	
Gadwall	3,580	2,717		Increasing
American wigeon	2,820	2,394	18	Decreasing
Green-winged teal	4,320	2,752	257	Increasing
Blue-winged and cinnamon teal	7,280	5,706		
Blue-winged teal		Not Differentiated		Increasing
Cinnamon teal		Not Differentiated		
Northern shoveler	4,140	3,613		Increasing
Hawaiian duck <sup>e</sup>		Not Applicable		
Laysan duck <sup>e</sup>		Not Applicable		
White-cheeked pintail <sup>e</sup>		Not Applicable		
Wood duck		Not Applicable		
Eastern population		Not Applicable		
Western population		Not Applicable		
Muscovy duck <sup>e</sup>		Not Applicable		
Whistling ducks		Not Applicable	Not Applicable	
Fulvous whistling duck		Not Applicable	Not Applicable	
Black-bellied whistling duck		Not Applicable	Not Applicable	
West Indian whistling duck <sup>e</sup>		Not Applicable	Not Applicable	
Redhead	1,210	820		Increasing
Canvasback	670	595		No trend
Scaup	4,790	3,698	49	Decreasing
Lesser scaup			49	Decreasing
Greater scaup			Not Applicable	Decreasing
Ring-necked duck	1,860	1,023	545	Increasing



Ruddy duck	1,120	574		Increasing
West Indian subspecies <sup>e</sup>		Not Applicable		
Continental subspecies				
Masked duck <sup>d</sup>		Not Applicable	Not Applicable	
Harlequin duck		Not Applicable		
Eastern population		Not Applicable	Not Applicable	
Western population		Not Applicable		
Long-tailed duck	870	147		
Eiders	1,820	14		Decreasing
King eider		Not Differentiated	Not Applicable	
Common eider		Not Differentiated	Not Applicable	
American subspecies		Not Differentiated	Not Applicable	
Northern subspecies <sup>e</sup>		Not Differentiated	Not Applicable	
Hudson Bay subspecies <sup>e</sup>		Not Differentiated	Not Applicable	
Pacific subspecies		Not Differentiated		
Steller's eider <sup>e</sup>		Not Differentiated		
Spectacled eider <sup>e</sup>		Not Differentiated		
Scoters	1,600	911	277	Decreasing
Black scoter		Not Differentiated	Not Applicable	
Surf scoter		Not Differentiated		
White-wing scoter		Not Differentiated		
Goldeneyes	1330	638	436	Increasing
Common goldeneye		Not Differentiated		
Barrow's goldeneye		Not Differentiated		
Eastern population		Not Differentiated	Not Differentiated	
Western population		Not Differentiated		
Bufflehead	1,480	1,004	26	Increasing
Mergansers	1,530	717	467	Increasing
Hooded merganser		Not Differentiated		
Red-breasted merganser		Not Differentiated		
Common merganser		Not Differentiated		

<sup>a</sup>Traditional Survey Area estimates were derived from the Waterfowl Breeding Population and Habitat Survey (WBPHS), strata 1-18, 20-50, 75-77. Other Surveyed Area estimates were derived from some combination of WBPHS strata (51-57, 62-69), the Breeding Waterfowl Plot Survey also conducted in eastern Canada, and concurrent state, provincial, or regional breeding waterfowl surveys in British Columbia, California, Colorado, Connecticut, Delaware, Florida, Louisiana, Maryland, Massachusetts, Michigan, Minnesota, Nebraska, Nevada, New Hampshire, New Jersey, New York, Oregon, Pennsylvania, Rhode Island, Utah, Vermont, Virginia, Washington, Wisconsin, and Wyoming. In cases where a survey was not completed every year, or when data were unavailable, mean estimates were computed using available estimates for that time period. Continental estimates include the surveyed area estimates as well as rough estimates of populations outside of surveyed areas based on harvest derivation studies, expert opinion, winter survey data, or special purpose research surveys. Continental estimates for species such as the muscovy, whistling ducks, masked duck, and many sea ducks are based on few data and are particularly speculative.

<sup>b</sup> Sub-populations are identified distinctly when there is significant evidence for allopatry. Races are also distinguished according to current taxonomic classification and refer to genetically distinct sub-species. The taxonomic delineation presented in this table is intended to aid in development of regional habitat conservation strategies and is not intended to supersede other international agreements regarding the appropriate organizational level for species management.

<sup>c</sup> "Not differentiated" indicates that the survey protocol does not enable discrimination to a particular taxonomic level. "Not applicable" indicates that the species, race, or sub-population is not recorded in the WBPHS Traditional Survey Area or in the surveys represented by the Other Surveyed Area category.

<sup>d</sup> Currently includes eastern survey region only

<sup>e</sup> Not shared among two or more signatory nations. Management is the responsibility of that nation whose boundary coincides with the range of the species, sub-population, or race.

Table 3. Status and objectives for North American goose populations.

		Population Status <sup>a</sup>	
		Mean (2001-2010)	Trend (1970-2010)
Species and Population	Objective <sup>b</sup>		
Canada and cackling goose			
Atlantic	175,000 <sup>c</sup>	166,200	Increasing
Atlantic Flyway giants	650,000	1,077,000	Decreasing
North Atlantic	Not yet established	56,900	Decreasing
Southern James Bay	100,000	76,300	No trend
Mississippi Valley	375,000	326,500	Decreasing
Mississippi Flyway giants	1,000,000	1,448,700	Increasing
Eastern Prairie	200,000	149,500	Increasing
Western Prairie and Great Plains	285,000 <sup>d</sup>	564,200	Increasing
Tall Grass Prairie	250,000 <sup>d</sup>	443,500	Increasing
Short Grass Prairie	150,000 <sup>d</sup>	201,200	No trend
Hi-Line	80,000 <sup>d</sup>	265,400	Increasing
Rocky Mountain	117,100	159,900	Increasing
Pacific	Not yet established	No estimate	No estimate
Lesser	Not yet established	No estimate	No estimate
Dusky	Avoid ESA <sup>e</sup> listing	10,900	Decreasing
Cackling	250,000 <sup>f</sup>	164,200	Increasing
Aleutian	40,000 <sup>d</sup>	102,900	Increasing
Vancouver	Not yet established	No estimate	No estimate
Taverner's	Not yet established	No estimate	No estimate
Snow goose <sup>g</sup>			
Greater	500,000	915,200	Increasing
Mid-continent lesser	1,000,000-1,500,000 <sup>d</sup>	2,535,800	Increasing
Western Central Flyway lesser	110,000 <sup>d</sup>	161,300	Increasing
Wrangel Island lesser	120,000	140,000	Increasing
Western Arctic lesser	200,000	608,000	Increasing
Ross' goose	100,000	>1,000,000	Increasing
White-fronted goose			
Mid-continent	600,000 <sup>f</sup>	696,300	Decreasing
Tule	10,000 <sup>d</sup>		
Pacific	300,000 <sup>f</sup>	496,700	Increasing
Brant			
Atlantic	124,000 <sup>d</sup>	149,400	Increasing
Pacific	150,000 <sup>d</sup>	124,600	No trend
Western High Arctic	12,000 <sup>d</sup>	8,400	Increasing

Eastern High Arctic <sup>h</sup>	Not yet established	29,000	Increasing
Emperor goose <sup>h</sup>	150,000	69,100	Decreasing
Hawaiian goose <sup>h</sup>	2,800		

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<sup>a</sup> Incomplete survey years were excluded from the computation of population mean. Where no estimates are available for 2001-2010, the most recent estimate is presented. Population trend based on available data between 1970-2010 for each species.

<sup>b</sup> Objective is total spring population unless otherwise indicated.

<sup>c</sup> Objective is breeding pair index. Objective partitioned to 150,000 pairs on the Ungava Peninsula and 25,000 pairs in boreal Québec

<sup>d</sup> Objective is total winter population.

<sup>e</sup> Endangered Species Act (ESA) (United States).

<sup>f</sup> Objective is total autumn population.

<sup>g</sup> Lesser snow goose population estimates include some Ross' geese

<sup>h</sup> Not shared among two or more signatory nations. Management is the responsibility of the nation which encompasses the range of the population, sub-population, or race.

Table 4. Status and objectives for North American swan populations.

Species and Populations	Objective	Population Status	
		Mean (2001-2010)	Trend (1970-2010) <sup>a</sup>
Tundra swan			
Eastern population	80,000	99,900	Increasing
Western population	60,000	91,600	Increasing
Trumpeter swan <sup>c</sup>			
Pacific Coast population	25,000	26,790	Increasing
Rocky Mountain population <sup>d</sup>	None	9,626	Increasing
Interior population	2,000	9,809	Increasing

<sup>a</sup> Population trend based on available data between 1970-2010 for each species.

<sup>b</sup> Population estimates are from annual winter surveys.

<sup>c</sup> Population estimates are from census and surveys conducted spring through fall across range, at 5-year intervals. Population mean is from 2010 survey, and trend is based on 2000, 2005, 2010 surveys.

<sup>d</sup> U.S. portion of breeding population was 676; objective for U.S. segment is 718. There is no population objective established for Canadian portion of breeding population.

## Appendix C

### The 2010-2011 NAWMP Consultation Process: The “Valuing Objectives” Exercise

The consultation process included two rounds of stakeholder workshops that were held in the United States and Canada and a related single event in Mexico. Participants included professional waterfowl managers, biologists, and administrators charged with waterfowl population management and habitat conservation. Federal, state, provincial and non-governmental organizations were well represented. Round 1 workshops were held in late 2009 and early 2010, and Round 2 workshops were held in late 2010 through February 2011.

During the first round of workshops, participants were asked to identify the goals (termed “fundamental objectives” in the workshops) of waterfowl management, and to develop hierarchies that identified step-down objectives necessary to achieve the goals. In most cases, the resulting diagrams depicted an inter-connected system wherein goals were identified for both their intrinsic value and their utility for achieving another goal. In discussions, many participants asserted that the goals of waterfowl management are inextricably linked and cannot be pursued in isolation.

To help quantify the intrinsic value of each goal and the extent and nature of the linkages, an exercise was conducted in Round 2 workshops wherein participants (N=91) were initially asked to allocate 100 points of “value” among four goals:

1. Perpetuate waterfowl hunting.
2. Sustain opportunities for the public to view and enjoy waterfowl and waterfowl landscapes.
3. Maintain healthy waterfowl populations in North America at levels sufficient to fulfill human desires and in harmony with the ecosystems on which waterfowl depend.
4. Conserve landscapes capable of sustaining waterfowl populations at levels sufficient to satisfy human desires in perpetuity.

Having done so, participants were then asked to allocate some portion of each goal’s value to pre-designated linkages among goals (keeping the sum constant at 100 points). In effect, stakeholders were asked to specify the extent to which they valued each goal in its own right (intrinsic value), plus the goal’s value relative to the degree it helped accomplish another goal (utility value). The results of this exercise are diagrammed below.

The figure depicts a linked system reflecting hierarchy diagrams and concepts gleaned from the consultation workshops; two initial goals, waterfowl hunting and waterfowl viewing/enjoyment, were subsequently combined into a single human use goal (#3 above) after this exercise, and the values for each of these and their linkages have therefore been summed in the figure here. Points in boxes represent the average values assigned to each goal and linkage by workshop participants. Sums of value points for each goal, both fundamental and those allocated to the utility flowing from one to another, are depicted in the summary box (e.g. Conserve Landscapes

$$= 13 + 15 (A) + 11 (C) = 39.$$

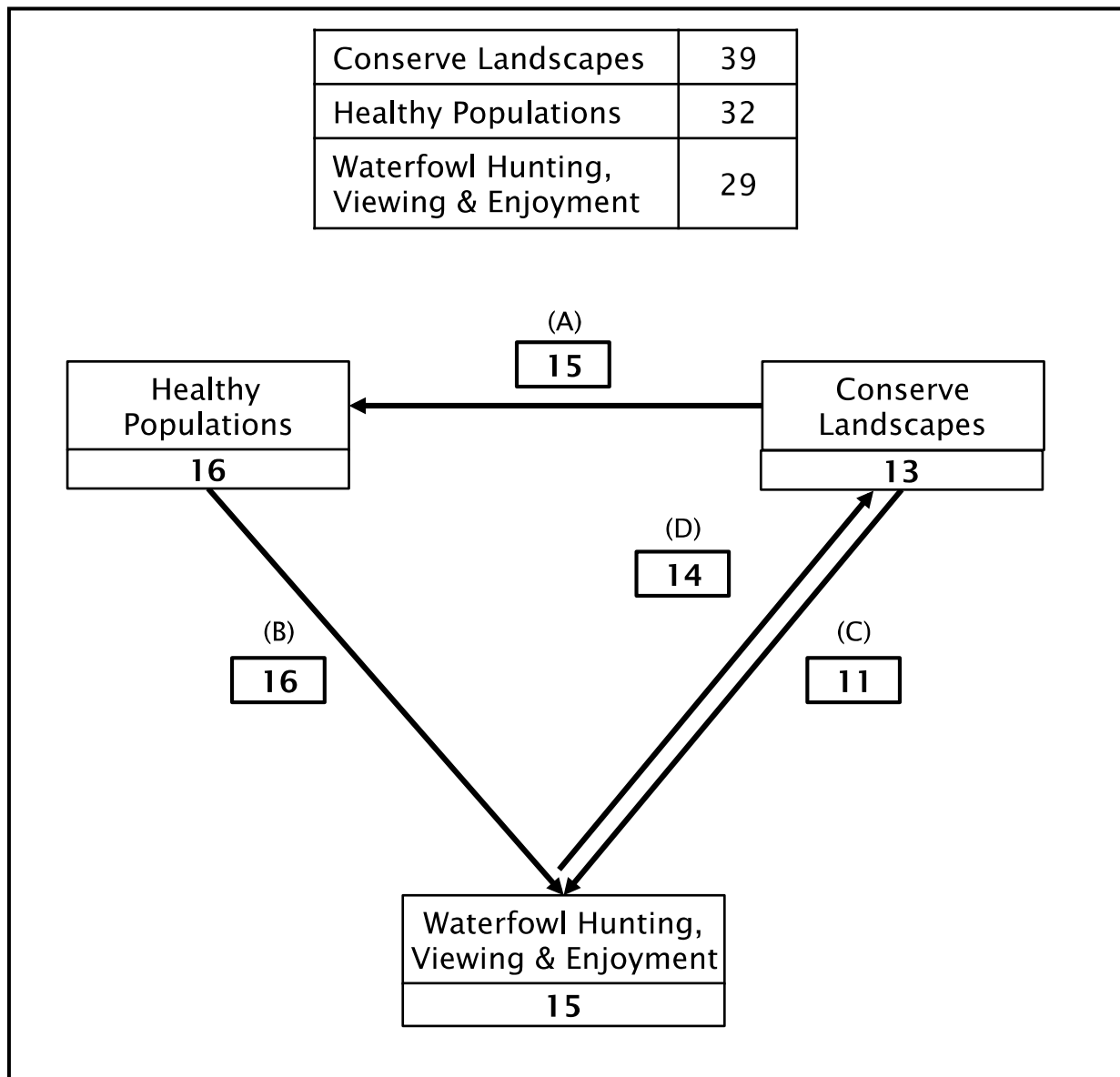
The utilities, reflected by arrows, convey the following relationships:

“A” represents the value that landscape conservation makes to healthy populations.

“B” reflects the value that healthy populations play in perpetuating waterfowl hunting, viewing and enjoyment.

“C” represents the value of conserving landscapes in helping to perpetuate waterfowl hunting, viewing and enjoyment.

“D” represents the role that waterfowl hunting, viewing and enjoyment play in helping conserve landscapes.





The results of this analysis were informative on several levels. Clearly, for many stakeholders, goals were not truly “fundamental” as characterized by independence of one another. Indeed, individual goals and the linkages between goals were weighted similarly when participant values were pooled. Similar intrinsic value was associated with “healthy populations” of waterfowl, with only slightly less value associated with “landscape conservation” and “waterfowl hunting and viewing”. Yet, the values associated with the linkages among goals were often almost as large as those associated with the fundamental goals themselves. Moreover, there is a marked directionality in these linkages.

For many stakeholders, conserving landscapes serves not only to provide places for people to hunt and enjoy the outdoors, but also is essential to sustain waterfowl populations at desired levels. Similarly, stakeholders view abundant and resilient waterfowl populations as a worthy fundamental goal, but also as a means to allow and sustain human use of the waterfowl resource. Closing the loop, waterfowl hunting and enjoyment is viewed as a desirable fundamental goal, but stakeholders equally recognize that this goal plays a key role in generating support and funding to conserve landscapes. While some stakeholders initially questioned the need for a more integrated framework for North American waterfowl management, this analysis was surprising for many participants in revealing their own beliefs about the strong linkages within the waterfowl management enterprise.

With nearly equal intrinsic values, it is important that the waterfowl management community devotes adequate resources to addressing each goal and their sub-components. Moreover, the clear implication of strong linkages *among* goals is that our waterfowl management enterprise is absolutely dependent on achieving all three goals. Put another way, a failure to achieve any goal will have serious ramifications for success of the entire waterfowl management enterprise.

# Central Flyway Council

Alberta Kansas Nebraska North Dakota Oklahoma South Dakota Wyoming  
Colorado Montana New Mexico Northwest Territories Saskatchewan Texas



[www.flyways.us/central](http://www.flyways.us/central)

September 23, 2011

NAWMP Revision Steering Committee  
U.S. Fish and Wildlife Service  
Division of Bird Habitat Conservation  
4401 North Fairfax Dr.  
Arlington, VA 22203

Gentlemen:

The Central Flyway Council (Council) would like to thank the North American Waterfowl Management Plan (NAWMP) Revision Steering Committee (Committee) for allowing us to provide comments and input into the NAWMP Revision process. We recognize the challenging task in assimilating input and revising this important document.

Similar to our past input, Council generally agrees with the proposed Vision statement. If retained, we would like to see the language regarding waterfowl hunting moved forward and substitute “other uses” for the term “desires”. We were not comfortable with the term “desires” and believe “other uses” provides more tangible terminology. We do find value in a more succinct Vision statement and encourage the Committee to find the appropriate language. If not, perhaps it would be best to disregard a Vision statement altogether, given more specific goals are laid out in this document.

Council was satisfied with the 3 goals proposed in this draft of the Revision. We realize that defining these goals was not an easy task given the breadth of concerns, interest and opinions among the waterfowl management community. We believe the goals as stated come as close as possible to meeting these varied concerns, interest and opinions without jeopardizing or changing the over-arching nature of NAWMP. For example, Council had initial concerns about incorporating ecological goods and services as a fundamental objective. While we recognize the overall value and importance of wetlands, we believe that this could potentially turn NAWMP into more of a wetland plan than a waterfowl plan. In goal #2, incorporating ecological services into a larger waterfowl habitat goal captures those values of wetlands without changing the focus of the Plan.

Council also was pleased to see the formal incorporation of a human dimension or use (i.e., #3) goal into the Revision. All of the stakeholders involved with NAWMP deal with people at some level. While the original Plan had inferences to the human elements regarding waterfowl conservation, we think explicitly stating this into a goal is critical to the future of NAWMP. We have been on record as supporting recruitment and retention of waterfowl hunters and will

continue to find strategies and methods to increase the numbers of this important segment of NAWMP constituencies. However, Council also believes general public support for wetland protection and conservation will greatly enhance and broaden our ability to sustain waterfowl populations. Indeed, in the near future, increased general public support for wetland conservation may be our best avenue to protect and conserve important waterfowl habitats.

While Council supports more formal incorporation of the human dimensions aspect into the Plan, we want to emphasize that formation of another “institution” (i.e., Human Dimensions Working Group) needs to be effective and efficient in addressing the relevant issues of waterfowl harvest management and habitat conservation. Given the limited resources we anticipate in the near future, it is incumbent on the waterfowl management community to ensure a focus and clear purpose of this group. Efforts must be made to link to on-going human dimensions and hunter recruitment activities in the broader conservation community, rather than duplicate efforts.

In regards to both the proposed Vision statement and goal regarding waterfowl hunting, we would like the Committee to be aware that perpetuating waterfowl hunting under the North American model of wildlife conservation is the mode in which Council supports. We could perpetuate hunting under a “European” style that only allows the rich or privileged to hunt and we do not support that type of system. We believe clarification of this is needed within the document contained within the Principles of NAWMP (under Principle #5).

Council generally supports the concept of integrating of waterfowl management and realizes this will require a lot of discussion and work, particularly if this Revision leads to an integration of habitat and harvest and requires altering institutions and processes. There are a number of regulatory responsibilities and processes that would have to be worked through and completed to comply with the forthcoming Supplemental Environmental Impact Statement on migratory bird hunting. Further, as the Committee is well aware, the waterfowl management enterprise is large and complex; this Revision poses possibly ambitious changes in the way business is conducted. We urge the Committee to reflect that such ambitious changes will likely come slowly as we consider, discuss and institute changes.

From that perspective, the recommendations provided in the draft Revision primarily point to a major shift in the current paradigms of waterfowl management. We believe these recommendations are relevant and crucial in terms of moving NAWMP into the future. The details in the forthcoming Action Plan (to move the Revision forward) are of great interest to the Council. We hope the Central and other flyways have the opportunity to provide input into the forthcoming Action Plan that will provide more details into the specifics of the next steps in the Revision of NAWMP.

We would like to note, in terms of integration, that we think the Central Flyway has been a leader in bringing our Joint Venture partners to the table. We have had dialogue with the Joint Ventures since 2006 concerning Joint Venture habitat initiatives and programs as well as general habitat issues. We look forward to continue to work with our Joint Ventures. We hope 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 focused habitat

conservation efforts. 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.

In the next decade, we believe the issues and demands on the waterfowl management community will be extremely complex and difficult to address. Ongoing and continued loss of waterfowl habitat appears to be the biggest and most ominous threat. Wetland drainage, conversion of prairie to crop fields, decline in the Conservation Reserve Program, energy development and exploration, climate change and other factors will perhaps subject waterfowl populations to unprecedented pressures, especially considering the current economic climate and agricultural commodity prices. We also expect that, within the next decade, the recent wet period observed on the prairies will cease, which will only exacerbate habitat losses.

In light of habitat loss, Council sees the next decade as pivotal to the issue of waterfowl hunter recruitment and retention. We believe we must act as quickly as possible to start engaging individuals to muster support for waterfowl management and habitat activities now, and into the future. Additionally, increasing the public support for wetland habitat conservation will be critical in the next decade if we are to soften the blow of habitat loss we anticipate. The creation and development of the Human Dimensions Working Group (HDWG) will be crucial in addressing these issues. We've had discussions concerning these issues and look toward being fully engaged with the HDWG in answering or addressing these issues.

Thank you again for allowing us to provide input on this important document.

Sincerely,

A handwritten signature in cursive script, appearing to read "John Emmerich".

John Emmerich, Chair  
Central Flyway Council

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