

Synthesis of Comments on Draft Plan North American Waterfowl Management Plan Revision



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North American Waterfowl Management Plan
Synthesis of Comments on the Draft Revised Plan, 2011
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Background

The North American Waterfowl Management Plan (NAWMP) Committee sought public comment on the Draft Revised Plan (Draft) from August 25, to September 26, 2011. Comments were submitted one of four ways:

- Email to info@nawmprevision.org
- A web form located at www.nawmprevision.org
- Comment document uploaded to www.nawmprevision.org
- Or mailed to the USFWS Division of Bird Habitat Conservation, 4401 North Fairfax Drive MS4075, Arlington, VA 22203, Attn: NAWMP Revision Comments.

Comments were received from 59 individuals and organizations.

- 48 emails from 39 individuals and organizations (one individual sent multiple separate emails)
- 10 comments were made via the web form or as a document uploaded to the web form.
 - One submission was submitted to the French language web form; a translation was provided by the Canadian Wildlife Service
- 5 comments were mailed to the Division of Bird Habitat Conservation; all but 1 were duplicates of comments submitted to info@nawmprevision.org, or as documents uploaded to the web site.

Regardless of submission method, many comments were formatted to respond to specific areas in which the Plan Committee was seeking input. These areas were communicated in an email to users of www.nawmprevision.org, and on the web site home page. The web form was also formatted to allow comment under each of the input areas.

- Name (optional)
- Organization (optional)
- Email (optional)

PLEASE COMMENT ON

- 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;

- 6. The concept of integrated waterfowl management and the greatest challenges/benefits likely associated with integration;
- 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;
- Uploading of any documents deemed appropriate by respondent.

Respondents were reminded that their personal identifying information and their comments may be made publicly available at any time.

Comment Collection and Analysis/Synthesis

The method used to collect comments was a non-probability, voluntary technique that invited stakeholders to comment in open-ended responses. Analysis of these textual data did not treat comments as “votes.” Comments were not “weighted” by organizational representation or respondent affiliation/position; nor did it matter if an idea was expressed by 25 people or a single person. Analytical emphasis was placed on the content or central message of a comment and its contribution to revealing to the Committee the depth and breadth—the scope—of stakeholders’ perceptions of the draft.¹

Each input area in the formatted web form represented a “theme,” and responses were “messages,” in which respondents requested that the Committee (Figure 1):

- Listen or hear,
- Know or comprehend,
- Empathize or feel, and/or
- Act or do.

¹ The methodology used here is an adaptation of “content analysis” (as summarized by Stemler)—a technique for categorizing textual or qualitative data, and systematically identifying themes and messages within comments. (Stemler, S. (2001). An overview of content analysis. Practical Assessment, Research and Evaluation, 7(17)).

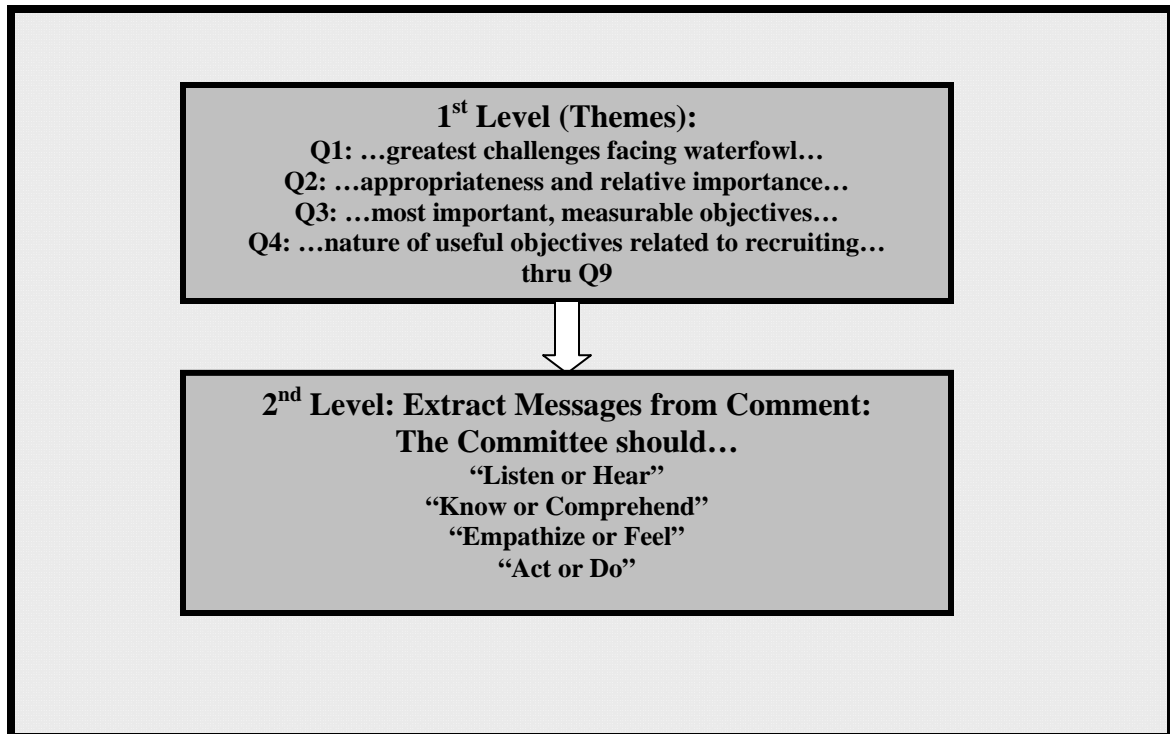


Figure 1. Framework for content analysis of stakeholders' comments on draft revised NAWMP.

The purpose of this synthesis was to extract and emphasize the messages embedded in a comment. In some instances, this process of reading comments and then extracting messages by restructuring and consolidating input resulted in notable reduction in the sheer volume of words (“data reduction”). However, some comments were quoted at length (and some, verbatim) with little reduction in verbiage. In other instances, separate comments that at first reading seemed nearly identical in meaning actually contained different messages based on subtle but important nuance, and these warranted distinct listings.

The majority of respondents (notably, state and provincial agencies, Flyways, Joint Ventures, NGOs) chose to submit their comments by letter or email. These comments generally were not structured in the input area framework outlined above. Most of these submissions are reported virtually verbatim under question 9 (“The sufficiency of proposed recommendations and action steps...”) because of the distinct character of each submission, and the importance that commenters attached to specific details and explanations/interpretations accompanying their messages. However, for improved clarity, these submissions were reorganized in outline format; thus, this process was essentially a “data organization” exercise rather than “data reduction.”

SPSS Text Analytics for Surveys was used to help content analysis. This software uses advanced linguistic theory and technologies based on natural language processing that extract and classify key concepts from open-ended responses. This software was particularly helpful in identifying themes and

messages in letters and emails that were not structured in the web form input area format, though as noted, little reduction in verbiage was possible (or appropriate) even employing text-analytic software.

Observations

As noted earlier, the comments are not “votes” and it would be inappropriate to summarize the comments in those terms. There is, however, an undercurrent that cuts across multiple perspectives, and that is the uncertainty surrounding change. Most, if not all, of the ideas and concerns raised by commenters relate to their understanding of the foundations of what waterfowl management has been, and what it will be in the future. The uncertainty around change is expressed in a number of different ways.

*Change is not made
without inconvenience,
even from worse to
better.*

Richard Hooker
16th Century Theologian

There is a tension among key constituent groups. Some see the need to move into a new future, even though that future is fraught with unknowns. Others maintain change is not needed, or not to the degree proposed in the draft plan. The tension was expressed in comments about the role of the Plan with respect to:

- the balance of management between hunted and non-hunted waterfowl
- the role of the Plan in hunter recruitment and retention
- level of emphasis on ecological goods and services – is this a waterfowl plan or a wetlands plan?

Many expressed concerns about factors outside the control of the waterfowl management community, such as the economy, climate change, and changing demographics.

While there is disagreement about the relative importance and priorities of the three fundamental goals, there is general agreement that the three goals are appropriate, and they are inextricably linked.

Many, if not all commenters identified the need for broader funding to support waterfowl and habitat conservation. However, concerns were expressed about the impacts of seeking broader support on traditional constituents. These concerns tended to be expressed in terms of:

- Inclusivity vs. segregation of hunters and other users
- Potential for conflict between traditional and new constituents, particularly in decision-making related to priorities

While many comments underscored the desire to add human dimensions, there was concern expressed about the appropriateness of the Plan and/or the waterfowl management community in addressing hunter recruitment and retention.

A number of comments related to the nature of the revision document itself as:

- too theoretical
- uninspiring, not motivating
- visionary
- too complex
- not detailed enough

Finally, there is an overwhelming sense of uncertainty of what implementation will look like. That uncertainty is prevalent in comments of those who support change as well as of those who prefer to maintain a status quo. In terms of the latter, comments tended to fall along the lines of “we don’t see a need for change, however if change is to occur, we want to see” Expression of uncertainty took several forms, including:

- concerns about building new bureaucracies
- concerns about losing sight of on the ground management in the process of focusing on change and integration – what happens to day to day management
- concerns that the institutions and arrangements on which the previous plan was based, are not “broken”
- concerns about what will be in the action plan
- concerns about sufficient resources – funding and staff – to undertake change and continue to address waterfowl and habitat needs

In the end, the overall message appears to be a reluctant endorsement of the direction “but we really want to know how you plan to do this and we want to see ourselves in the process.”

Results

Fifty-nine commenters offered remarks; in several instances, individual commenters submitted multiple comments (Table 1).²

1 (Theme 1): Please comment on the ***greatest challenges facing waterfowl management in the next decade.***

Keywords: habitat, waterfowl populations, hunter numbers, fiscal resources, goal integration, human population, culture

Messages:

1. Habitat was the driving force that created NAWMP and should remain the primary emphasis of the revised plan—increasing habitat quantity, quality, and distribution on the landscape.

²Draft authors should read all comments as originally submitted (verbatim) for content and context. Commenter recommendations for specific edits are not included in this synthesis unless they carried substantive import.

Table 1. Organizational affiliation of respondents.	Frequency	Percent
Agriculture and Agri-Food Canada	1	1.7
American Veterinary Medical Association	1	1.7
Arctic Goose Joint Venture	1	1.7
Association of Fish and Wildlife Agencies	1	1.7
Atlantic Flyway Council	1	1.7
Audubon Alaska	1	1.7
Black Duck Joint Venture Management Board and Technical Committee	1	1.7
California Waterfowl Association	1	1.7
Canadian Intermountain and Pacific Coast Joint Venture	1	1.7
Canadian Wildlife Service	1	1.7
Central Flyway Council	1	1.7
Columbia Wetlands Stewardship Partners	1	1.7
Connecticut Department of Energy and Environmental Protection	1	1.7
Delta Waterfowl Foundation	1	1.7
Ducks Unlimited	2	3.4
Ducks Unlimited Canada	1	1.7
Eastern Habitat Joint Venture Management Board	1	1.7
Idaho Department of Fish and Game	1	1.7
Indiana Department of Natural Resources Division of Fish and Wildlife	1	1.7
Intermountain West Joint Venture Management Board	1	1.7
Iowa Department of Natural Resources	1	1.7
Lower Mississippi Valley Joint Venture	1	1.7
Mississippi Flyway Council	1	1.7
Missouri Department of Conservation	1	1.7
Nebraska Game and Parks Commission	1	1.7
New York Department of Environmental Conservation	1	1.7
None	3	5.1
Ohio Division of Wildlife	1	1.7
Ontario Ministry of Natural Resources	1	1.7
Pacific Flyway Council	1	1.7
Prairie Habitat Joint Venture	1	1.7
Prairie Pothole Joint Venture	1	1.7
San Francisco Bay Joint Venture	1	1.7
Saskatchewan Ministry of Environment	1	1.7
Sea Duck Joint Venture Continental Technical Team	1	1.7
Seaducks Unlimited	10	16.9
Sierra Club, Defenders of Wildlife, The Wilderness Society, Wildlands Network	1	1.7
U.S. Fish and Wildlife Service	5	8.5
Union des producteurs agricoles	1	1.7
Utah Division of Wildlife Resources	1	1.7
Wildlife Management Branch, British Columbia Natural Resource Operations	1	1.7
Wisconsin Department of Natural Resources	1	1.7
Wyoming Game and Fish Department	1	1.7
Total	59	100.0

2. Increasing commodity prices are driving conversion of grassland and pasture habitats into row crops; this, as well as government conservation incentives being funded at dramatically lower levels than 20 years ago when waterfowl populations began to increase, should be explicitly addressed in the NAWMP revision.
3. The decline in waterfowl hunter numbers is alarming because hunters have always been and will continue to be the best advocates for wetland and waterfowl conservation—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 does not limit participation, thus encouraging long-term hunter support for wetland and waterfowl conservation.
4. Instability in the world economy may be the greatest challenge in the next decade; when world markets are unstable, people focus on the immediacy of making a living and merely surviving; waterfowl become irrelevant.
5. Global warming, water scarcity—especially accelerated global warming—may redirect conservation attention to more endangered, high profile species and habitats, diminishing attention on waterfowl—not to mention real impacts on breeding and wintering grounds.
Waterfowl and wetland conservation must remain relevant to an increasingly diverse culture; this requires retaining traditional supporters, and appealing to non-traditional constituencies, including women and youth, by giving these new clienteles an experience in the marsh.
6. We think the Draft's description of the unprecedented decline in both U.S. and Canadian waterfowl hunting—over 30% decline in the U.S. and over 70% in Canada from the 1970s—does not place the necessary emphasis on the implications of this decline. This decline is no less than a crisis in culture, with waterfowl hunting in jeopardy as well as waterfowl management activities. This crisis and its implications for Canada are especially understated in the Draft.
7. It is not clear whether the comment form is asking us to articulate the greatest challenges to waterfowl, or the greatest challenges to waterfowl management; the implication appears that the Plan Committee thinks that the greatest challenge to waterfowl management in the next decade is the lack of integration of harvest, habitat, and human dimensions of waterfowl management. If so, we reject the idea that lack of integration is the greatest challenge; we may not have a perfect system, but it has been adequate and will continue to be so even if integration is not achieved (and indeed, integration may result in a change for the positive, or possibly for the negative). Habitat loss and degradation constitute the greatest challenge facing waterfowl, and manifest and synergize in a multitude of ways: nations in fiscal crisis, CRP withdrawal, dwindling federal budgets, state budgets in crisis, industrial development/destruction in the Arctic, dwindling hunter numbers, weak or nonexistent policy and regulatory tools to conserve habitat, and growing restrictions on the degree to which

- waterfowl managers can engage even the most basic of professional activities (research and monitoring, travel, collegial coordination).
8. The greatest challenge is securing adequate funding to conserve habitat essential to sustaining waterfowl populations; new funding streams might be generated by
 - a. tapping other user groups such as bird watchers,
 - b. mobilizing new supporters by promoting the link between human health and healthy ecosystems, and
 - c. promoting the promising emerging markets for ecosystem services (e.g., wetland/grassland carbon credits).
 9. Though habitat conservation and management in the face of fiscal crises remain the greatest challenges, the Draft emphasizes 2 important and thought-provoking facts:
 - d. high waterfowl populations and regulation changes are not driving waterfowl hunting interest and participation, and
 - e. habitat conservation is increasingly dependent on achieving a broader political and financial support base than hunters, to include other wildlife enthusiasts.
 10. Sheer human population growth is a great challenge, exacerbated by growing isolation of a burgeoning citizenry from the natural world.
 11. Great challenges are the preferred habitat and preferred species biases among managers, exemplified by traditional emphasis on harvestable populations of preferred ducks, and far less attention on and needed differentiation (including science) among less favored or non-hunted species.

2 (Theme 2): Please comment on the ***appropriateness and relative importance of the three goals.***

Keywords: Fundamental goals, goal balance, waterfowl constituents, habitat, human dimensions, waterfowl populations, priority

Messages:

1. The 3 goals are good, explicit, pertinent, accurate, succinct and inextricably related; no one goal can be achieved without the others—all are important to waterfowl management.
2. The 3 goals are appropriate; I believe the 3rd 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 must resonate with the general public to the point they actually care. There are many competing issues to care about, so it will be difficult to gain this support, but it’s imperative or the vision will not be realized.
3. While the goals are balanced in terms of weight, the responsibilities by various entities for delivering on the goals may be much different; it’s

- important for all involved in waterfowl and wetlands conservation to “see themselves” in each goal.
4. The 3 goals are appropriate and listed in the correct order of importance. It is not clear that Goal 1 (populations) is achievable without Goal 2 (habitat). Nor is it clear that advocacy and financial support necessarily flow 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.
 5. We agree fully that the 3 fundamental goals are appropriate and inextricably linked, but we suggest commentary be added prioritizing human uses on the theme that waterfowl hunters, in their historical financial and political contributions, deserve greater weight than other groups.
 6. It is inappropriate for any of the 3 fundamental goals of NAWMP to single-out special interests; the goals must be to support waterfowl conservation and garner support from all citizens.
 - a. To illustrate, Goal 1 immediately segregates citizens, stating “abundant and resilient waterfowl populations to support hunting and other uses without imperiling habitat.” Please revise Goal 1 to clearly and explicitly represent all constituents, such as, “Abundant and resilient waterfowl populations to support the study, observance, feeding, photographing, and harvesting of waterfowl.”
 - b. Goal 2 is great, comprehensively recognizing benefits for all.
 - c. Goal 3 again divides citizens based on harvest; better wording is, “Growing numbers of all conservationists who enjoy and actively support waterfowl and waterfowl habitat conservation.” In short, it is unproductive and unnecessarily divisive to identify waterfowl users as “hunters” and “other” users; we “others” take exception to this simplistic categorization. We understand the importance of stepping up, and welcome the opportunity to engage revenue generating opportunities; you understand that there has not been a revenue-generating mechanism that shows the clear intent of all conservationists—we need this mechanism so that our contributions aren’t continually obscured under initiatives dedicated solely for harvesters. All conservationists need a prominent seat at the table
 7. Goals:
 - a. Goal 1, no comment.
 - b. Goal 2 suggested rewording: “Wetlands and related habitats 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.”
 - c. Goal 3 suggested rewording: “Growing numbers of waterfowl hunters, and other conservationists and citizens who enjoy and actively support the conservation of waterfowl and waterfowl habitat.”

8. All 3 goals are appropriate and require more specific measurable objectives which we understand will come in a later document. 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. We consider this statement critically important: “more explicitly incorporate human objectives into our decision-making process.” Overall, 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.
9. The 3 goals are relevant and interdependent; however, the appropriate balance of resources expended on harvest regulation, habitat conservation, and human dimensions (particularly in the near- and medium-term) will not be an even split. Habitat conservation remains the single greatest priority of waterfowl management. The balance of coverage of these aspects in the Draft should be adjusted to communicate the imperative of population conservation—hence, habitat conservation—as waterfowl conservationists press-on in the near term.
10. Kudos to all who’ve brought the Draft to this stage. I like the Purpose statement and 3 Goals. However, give consideration to changing the order of the 3 goals. Whether intended or not, they currently suggest a priority. In my mind, sustaining habitat is the most important issue; without it there are no waterfowl and no hunting or other uses, and maintaining, restoring, and creating waterfowl habitat have long been the major focuses of NAWMP and the JVs. I 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 to 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 an 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.

3 (Theme 3): Please comment on the ***most important, measurable objectives that would serve to accomplish the stated goals, and how to develop these.***

Keywords: Draft objectives, goal integration, no net loss, priority landscapes, hunter satisfaction, wider waterfowl constituency

Messages:

1. Population goals are very important and we already measure abundance annually (BPOPs), so it makes sense to include them here as in the original NAWMP. 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 Draft is a necessity.
2. Goal 1: how will abundant waterfowl populations, hunting or related uses imperil habitat? Drop “without imperiling habitat.”
3. Goals:
 - a. Goal 1 (objectives): stable waterfowl population; continue Waterfowl Breeding Population and Habitat Survey annually or at least bi-annually to ensure that populations as a whole and individual species are evaluate.
 - b. Goal 2 (objectives): no net loss policy in place and enforced continent-wide; implement this through the proposed integrated waterfowl management system.
 - c. Goal 3 (objectives): a measurable increase in waterfowl hunter numbers in 5 years (evidenced by % growth); accomplish this through hunter recruitment and promoting that being a hunter is socially acceptable—work toward a hunter community that doesn’t wear all plaid or camo—reduce the rabid hunter image and promote waterfowl hunting as an integral component of organic, local food. Increase the general citizenry’s contribution towards wetland conservation through Ecological Goods and Services programs linking urbanites with rural duck-producing wetlands.
4. Wetland and upland habitat acres should be monitored, and changes to the landscape determined, perhaps every 3rd or 5th year. Accurate determination of the May Waterfowl BPOP and distribution should be maintained. Market and broaden Duck Stamp sales (and increase the Duck Stamp cost). And we need to be more creative in increasing waterfowl hunters.
5. Goals:
 - a. Goal 1 (objectives): Using a range (or long-term average) for population level (as a management objective) is more desirable than a specific population level to guide annual allowable harvest. Population objectives that are established should be relevant to contemporary capacity and established objectives for wetlands and associated waterfowl habitats.
 - b. Goal 2 (objectives): The Draft should include a map of priority landscapes, and emphasize the importance of constantly improving our habitat monitoring systems through emerging technologies (GIS, unmanned aircraft).

- c. Goal 3 (objectives): Include a proximate objective of stabilizing hunter numbers, and ultimate objective of increasing numbers; also appropriate to include an objective for enlisting and energizing the support and tapping the financial resources of waterfowl viewers and others who enjoy waterfowl and wetlands.
- 6. Goals 1 and 2 (objectives): Population goals are the most important and mostly easily measured. We understand that the desire for habitat and harvest to be linked through population goals is what spurred this Revised Draft; it is unclear to us what the interface between harvest and habitat will look like, in actual regulation of hunting. While these 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 should be our focus. Presumably, once the Draft is adopted, much of the early work will focus on relating yield curves/habitat to shoulder points/harvest, an emphasis we hope to see in this Draft. We're concerned that the Draft may be going far beyond these basic needs in too complicated a manner. Moreover, determining how this basic work is to be accomplished will require tight coordination with the states through the Flyway system.
 - a. Goal 3 (objectives): We'll need to define measurable objectives or metrics that evidence "growing" number of hunters and conservationists (e.g., stamps sales for hunters, financial resources from other non-traditional groups), but these require more consideration, perhaps from the Human Dimensions Working Group.
- 7. Goals:
 - a. Goal1 (objectives): Sustain populations of waterfowl at NAWMP targets.
 - b. Goal 2 (objectives):
 - i. Ensure conservation activities are adequately funded;
 - ii. Joint Ventures continue to work with partners to secure waterfowl habitat for conservation;
 - iii. No net loss of waterfowl habitat, particularly wetlands;
 - iv. Climate change impacts on waterfowl habitat are clearly understood and integrated into conservation planning;
 - v. Identify and map continental, national, and regional habitat priorities for waterfowl, and use these
 - c. Goal 3 (objectives):
 - i. Better inform the public about the conservation and ecological values (including human health) of NAWCA-funded projects;
 - ii. Engage campaigns NGOs and government to reconnect our citizenries with the outdoors.

8. Goal 3 (objectives): Promote all citizens as the desirable and largest force capable of supporting waterfowl management; to do otherwise is to rely on “old” money (only hunters) to do the “new” job the Draft represents. Ducks Unlimited can be for all citizens and their interests in waterfowl.
9. Goals:
 - a. Goal 1 (objectives): Waterfowl population objectives remain an important element of the Draft; however, we are supportive of species population goals other than those based on population levels of the 1970s. When most duck populations are well beyond a “species of concern” level, is it really necessary spending, for example, so much regulatory energy reducing the scaup bag limit or season length because we no longer have 7 million scaup? (And why is 4 million scaup not enough?) The sooner we move away from the memory of the 1970s defining a waterfowl management utopia and look toward the new 21st century, the better our management will become.
 - b. Goal 3 (objectives): We can slow or perhaps stop the decline in waterfowl hunter numbers if we shift our management focus to measure attributes that contribute to a satisfying waterfowl hunting experience. We asked waterfowl hunters to rate 20 attributes that may contribute to a satisfying hunting experience, and 5 of the top 6 were consistently social of hunting experience attributes, with seeing ducks/geese the only population-related experience in the top 6.
10. Goal 3 (objectives): A recent report based on the 2006 National Survey of Wildlife-Associated Recreation estimated there were 48 million bird-watchers in the U.S. in 2006 who spent \$36 billion on their birding interests; importantly, 77% of these bird-watchers observed waterfowl, making waterfowl the most watched bird group in the nation. Yet very little of the financial clout represented by these wildlife users was captured in any manner to help with traditional management programs. It’s time to think big and engage the wider wildlife constituency to obtain funding necessary for comprehensive waterfowl management.

4 (Theme 4): Please comment on the *nature of useful objectives related to recruiting and retaining waterfowl hunters.*

Keywords: Social change, hunter motivations, new waterfowl constituents

Messages:

1. Simply, loss of habitat and associated loss of access to hunting areas is devastating to waterfowl hunting; today’s human population (in social and economic characteristics—and sheer numbers) and today’s landscape are not the culture and landscape of 50 years ago in which so many of today’s aging hunters grew up learning the techniques, traditions, and skills of waterfowling in the local marsh after school. The change from yesterday

- to today is nothing less than dramatic; and so too the loss of waterfowl hunters is and will continue to be dramatic without dramatic response.
2. Access to hunting opportunities near urban centers is important; programs that enable hunting access to both public and private lands would be beneficial.
 3. We must stop thinking that all hunters are “like me”—based on a sample of 1. Examine what a non-typical hunter needs to see him/herself as a hunter—what is the psychological driver that would make someone identify themselves as a waterfowl hunter. Encourage them to hunt—welcome them to hunting—by making waterfowl hunting accessible, fun, and non-intimidating (mentor should *not* show up all decked out in camo with a truckload of decoys, determined to limit-out); and we need to know if *new* or *prospective* hunters are deterred by regulations or duck identification—data suggest that waterfowl hunters in the know apparently are not, but what about those not in the know?
 4. Understand the changing social landscape; the Human Dimensions Working Group will help, though the Draft doesn’t provide much detail beyond this mention.
 5. Understand hunter churn—hunters choosing to hunt one year but not the next, or next...then reengaging. In fact, give attention to establishing a array of metrics consistent across states and provinces that will help us understand hunter recruitment and retention.
 6. We greatly appreciate the Draft’s explicit acknowledgement of the importance of hunters in NAWMP’s activities, as well as specific reference to U.S. and Canadian waterfowlers as the primary constituency of NAWMP. We believe this a grave omission in recent revisions. While developing actions to arrest declines and improve recruitment and retention may be difficult, we believe the acknowledgement of the declines and having them rise to the level of a primary goal places necessary emphasis on this issue as implementation plans from the Draft are enacted.
 7. Reality is that it may not be within our power to address the large-scale societal issues that are driving the decrease in hunting. It seems clear that we cannot affect recruitment and retention with higher populations of ducks and better habitat. We believe that the state/province is the appropriate level for recruitment/retention efforts. The first question may be why hunters chose not to hunt and concentrate on how we can affect those factors, if at all. Then, explore why new waterfowlers start hunting; what motivated them, and what obstacles, worries, concerns, lack of know-how, costs, or reservations did they overcome?
 8. It is important for all Joint Venture partners to recognize that hunting contributes funds for conservation, so it is beneficial to promote ethical and sustainable hunting.
 9. *Focus on new revenue.* Hunting is a family tradition; it is not up to government to promote (“recruit”) one use over another. Waterfowl for all citizens must be the focus. Time and taxpayer resources would be better

- spent to welcome all contributors, especially those already willing and able stakeholders that hunt with cameras and their eyes. To continue to solely solicit from the dwindling number of harvesters will only delay efforts to garner revenue from the larger population. Please don't miss this critical opportunity to promote a new, broader constituency for wildlife.
10. Hunter recruitment/retention are worthy objectives; but acknowledge this is an uphill battle—50 years from now, waterfowl management will likely not be hunter driven.
 11. “Are we doing the right things?” It seems apparent that we are not doing the right things if we have been unsuccessful in stopping the decline in waterfowl hunter numbers. The Human Dimensions Working Group would be appropriate to propose such objectives.

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

Keywords: Broadened constituency, common ground, cooperation, all wildlife, clean air and water, landscape-level conservation

Messages:

1. While there are other users of the waterfowl resource, past efforts to engage these groups (especially financially) have fallen short. Hunters advocate the importance of waterfowl and habitat conservation in the political arena and contribute financially. Hunters, though engaged, could 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.
2. 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); so coalitions can be built when stakeholders see how their resources are being put to use.
3. Coordinate, integrate, and then promote Ecological Goods and Services (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 waterfowl conservation message to the general public.
4. 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.).

5. Engaging a broader constituency 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 (according to the National Survey of Wildlife-Associated Recreation).
6. The greatest potential benefit for engaging new stakeholders is to build broad-based support for landscape-level, voluntary, incentive-based policy and programs that affect habitat at a large scale. This type of cost-effective programming yields clean air and water, mitigates floods, stores carbon, promotes endangered species and diverse species habitats, among others. Yet our ability to demonstrate and connect the beneficiaries of these actions (the public at large) with these policy efforts has been elusive. To bolster broad scale support, especially in these difficult financial times, we need communications plans and marketing to clearly outline the benefits and outcomes that all stakeholders derive. That said, we remain skeptical that the broader public is a constituency or significant funder for direct NAWMP programming but rather as potential political ally to move policy actions towards constructive policy outcomes.
7. We don't 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. We need to determine exactly what it is we are asking of this "broader constituency," whether 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. It seems complicated. First is that we don't know how to engage these people effectively. Second is a sense of distrust among hunters at involving non-hunters in decision-making processes. Hunters have thus far paid the majority of the way for waterfowl, and it is only fair, the thinking goes, 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. But there may be expertise or experience within natural resources agencies in terms of outreach and public interactions. What are the experiences of those few agencies that already receive general revenues in addition to license receipts? They still have strong hunting programs, don't they? We need to share our waterfowl goals with other agencies and individuals to show that many of our goals are not mutually exclusive.
8. Broader constituency:
 - a. Include all Americans in this Draft, equitably, without division. Rise above the traditional "us against them" polarized atmosphere created by apparent special interest bias and alliance on behalf of one group; citizens with diverse wildlife interests can find much common ground.
 - b. Continue sustained pressure for Teaming with Wildlife (TWW); this would establish a fund for all wildlife that belonged to all citizens.

- c. Market the Migratory Bird and Conservation Stamp (federal duck stamp) more effectively and efficiently to the millions of birders who spend billions bird-watching. Raising awareness that this is for wildlife habitat purchased by all citizens will be a badge of honor. To continue to call it a hunting stamp again sets up polarity of one against the other.
 - d. This is the 75th year of the National Wildlife Federation (NWF). 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—something—might be the spark to engage a broader constituency—or at least heighten the conversation that began in earnest with TWW
 - e. We understand user-pay/user-benefit rationale, but there are many instances where aesthetic-oriented users are helping to pay, but their contributions are easily overlooked—a few examples:
 - i. Americans who purchase firearms but do not harvest wildlife or waterfowl (Pittman-Robertson excise fees);
 - ii. Migratory bird and conservation stamps purchased by Americans who do not harvest waterfowl;
 - iii. Migratory bird and conservation print and medallion editions purchased by Americans who do not harvest waterfowl.
 - iv. Conservation easements producing habitat are purchased by Americans who do not harvest waterfowl;
 - v. Habitat is purchased by conservation-NGOs composed of members who do not harvest waterfowl;
 - vi. Ducks Unlimited US and Canada have some members who do not harvest waterfowl;
 - vii. Lobbying for waterfowl and habitat conducted by groups and individuals who are more aesthetic-oriented than harvest-oriented.
9. Broader constituency:
- a. 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 relates to clean water, clean air, recreational opportunities; emphasizing the conservation of land and water for ecosystem services not only reaches a broader audience but achieves waterfowl conservation by way of habitat protection.
 - b. 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

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 one regulatory biologist for information and ideas. This could lead to expanded industrial contributions to JVs and on-the-ground waterfowl conservation.

10. Having participated in one of the sessions I can appreciate all of the thought and hard work that went into this document. It is well written and speaks to the overall direction of the plan at a high level; we find no points of any significant concern. 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 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.

6 (Theme 6): Please comment on the ***concept of integrated waterfowl management and the greatest challenges/benefits likely associated with integration.***

Keywords: Linkages, efficiencies, proof, bureaucracy, impediment

Messages:

1. The objections we have to integrated waterfowl management as laid-out in the Draft is that we see little direct “on the ground” benefits to waterfowl, as we read the Draft goals. As a community, we integrate, talk, meet, and over-complicate the process to the point that waterfowl see no real gains in populations or acres of quality habitats at the continental scale (or more realistically, mere stabilization at the current level). 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.

2. This (page 3) is not a new vision; it's a new approach that explicitly recognizes the interrelatedness of decisions and actions.
3. A great concept; benefits are endless—the imagination and creativity that should come from all of the various organizations with an integrated system should produce fantastic results. One of the greatest challenges will be having everyone park their own and their organization's egos at the door and approach the development of 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.
4. Our biggest problem is that, because we are outside the typical models for doing conservation, we have major problems finding funding.
5. Communication will be crucial for integration. If everyone starts out on the same page—and reassess their management goals—then we can work together to achieve those goals.
6. The key to waterfowl populations is adequate habitat. Incorporating human dimensions (understanding all constituents), determining what can increase waterfowl hunter participation, and determining how to get the general public excited about waterfowl are commendable and worthy goals. But the ultimate question is how we maintain and increase waterfowl habitat.
7. Acceptance of the need for change among the waterfowl management community is the near-term impediment to integration. Technical complexity related to coherence is an obvious challenge that will require long-term emphasis. Leadership will be required to affirm the technical strength integration offers.
8. As the Draft articulates, linkages among functions beg integration. One outcome of this new approach might be recognition that hunter access to wintering grounds is a recruitment and retention tool. Integration could help prioritize habitat investments on public lands, providing habitat values and adding incremental high quality hunting opportunities.
9. To complement articulation of clear quantifiable objectives, identify a process to enable continuous adjustment of these objectives, thus ensuring an adaptive approach.
10. The Draft fails to convince that integration will provide “benefits” and “efficiencies.” This is stated but not supported; no examples are given. Integration creates more bureaucracy that may impede progress of each individual discipline, and no efficiencies. More convincing may be the forthcoming action plan; but the addition of more oversight (Integration Technical Team) seems counterproductive to streamlining waterfowl management.
11. The “lack of integration” problem was hard for me to understand.
12. Our Joint Ventures (CI, PC) already integrate population management and habitat conservation on some level. These JVs have used habitat-species models to determine priority areas for partners to conserve, either

because the areas support significant numbers of waterfowl, or the habitat is critical to sustaining waterfowl populations and is at risk of being lost. Each JV within Canada (and the US) operates differently. Because each JV has unique challenges and different partners, it is difficult to create one “cookie-cutter” structure.

13. There are benefits of integrating and developing stronger linkages between habitats, waterfowl populations and users/supporters of conservation, although the waterfowl community must 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.
14. The concept of integrated waterfowl management is sound and logical. The benefit is in forcing waterfowl conservationists to explicitly consider and quantify the interdependencies among population management, habitat conservation, and constituent attitudes/behavior. Challenges are (1) disrupting long-held structures and accepted ways of doing business, 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 (Theme 7): Please comment on the ***strategies that would make waterfowl management more efficient, effective, and responsive.***

Keywords: Harvest, integrated management, human dimensions, habitat, population goals, constituency, adaptive management

Messages:

1. Strategies:
 - a. 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 and efforts to increase opportunity would likely be beneficial for recruitment and retention. More time and energy by the conservation community could then be directed to “on the ground” habitat programs.
2. Strategies:
 - a. Collaborative integrated management.
 - b. Data sharing.
 - c. Involve landowners/producers directly 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.
3. Key strategy is incorporating more time, energy, funds and focus on maintaining and managing habitat by state and federal agencies and NGOs.

4. Strategies:
 - a. Greater emphasis favoring habitat for waterfowl and waterfowlers is needed—habitat is the one feature of waterfowl conservation for which we have the greatest and immediate need.
 - b. Reduce specificity in harvest management while retaining monitoring needed to track population status and trends.
 - c. Consistent and simplified regulations should be considered as a potential path to greater hunter recruitment and retention.
5. Key strategy is to give all species and populations the attention, protection, and management afforded under the Migratory Bird Treaty Act, to the benefit of all citizens.
6. Clearly delineate the critical agency and NGO functions and responsibilities in implementing the Draft. There will be a high degree of common responsibility and all agencies and organizations must define their abilities to engage NAWMP according to their mandates. But a clear expression of all the necessary functions envisioned in the new integrated operations could yield less duplication, more efficiencies, and broader consensus among all parties.
7. Strategies:
 - a. Current waterfowl managers may need to enlist other administrative units and/or staff from their agencies to take on integrated functions (e.g., joint habitat management, land acquisition). Untapped expertise may exist within natural resource agencies, or even outside these agencies but inside state/provincial/federal governments.
 - b. 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.
 - c. 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.
 - d. 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.
 - e. 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. Strategies:
 - a. Practice adaptive management.
 - b. Broaden the constituency.
 - c. Maintain agency funding (congressional lobbying).
 - d. Do public outreach (social media, TV and radio).

9. Strategies:

- a. As we improve the integration of human dimension evaluations and objectives into waterfowl management, we'll learn much about whether we're "doing the right things". When we establish measurable objectives related to people interested in waterfowl conservation, citizens essentially will point the way to priority work.
- b. As we learn we will need to be willing to let go of practices that are outdated and respond to new opportunities.

10. Strategies:

- a. Strong leadership.
- b. Effective communication/listening skills.
- c. Adequate resources to ensure the waterfowl community has the capacity to develop.
- d. Implement and monitor the outcome(s) of this new approach.

8 (Theme 8): Please comment on 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***

Keywords: Leadership, committees, regulations, mandates, integration

Messages:

1. 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?
2. 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.....
3. Most of the Columbia Wetlands is provincial crown land. The Draft 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.
4. Institutions:
 - a. Less time might be devoted to setting hunting regulations and more energy expended in habitat work by waterfowl managers. Annual modifications of regulations might still be needed, but there should be much more flexibility in establishing hunting seasons.
 - b. The federal government needs to make some adjustments in attitudes and procedures.
5. Institutions (in order of priority, though all are near-term needs):
 - a. Review of the composition and increased leadership role of the Plan Committee.
 - b. The Plan Committee must provide the leadership to advance the integration of objectives and strategies for population, habitat, and waterfowl supporters.

- c. The Plan Committee should establish the clear expectation that human dimensions will be fully integrated into the traditional emphasis on harvest and habitat management.
 - d. Leadership will be essential by the Plan Committee as we advance different harvest management regimes, each with greater perceived risk than considered acceptable in the past.
 - e. Establish and support a Human Dimensions Working Group .
 - f. Establish and support the Integration Technical Team that is representative of the expertise needed to advance all three fundamental goals.
6. Institutions:
- a. We heartily endorse the creation of new functional bodies to address some of the key elements of the Draft, 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.
 - b. There is a broad complement of technical experts that span habitat conservation efforts, regulations, population assessment, research and evaluation, among others, that are contributing at a high level to the whole of the waterfowl conservation/harvest management effort.
 - c. 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, that broad consensus will be sought among all parties that these changes suit their areas of expertise while keeping necessary functions whole.
7. A review of the number of committees and working groups is always valuable.
8. Institutions:
- a. We do not see gross inefficiencies in the current system, and feel that the Draft does not do a good job of illustrating inefficiencies, if they exist. 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.
 - b. We think that the ITT, as described in the Draft, 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 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.
- c. 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 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).
 10. 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 Draft.
 11. 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.
 12. 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 Draft and measure returns on investment. Consider that sound science is a major component of this Draft, and we continue to lack important information and the resources needed to obtain it on species such as sea ducks.

9 (Theme 9): Please comment on the *sufficiency of proposed recommendations and action steps to move this plan forward.*

Keywords: Management community, change, committees, detail, action plan, flyways, state and provincial agencies, non-government organizations

Messages:

1. 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, and distribution) and, thus, ensuring our subsequent long-term

- ability to sustain waterfowl populations at desired levels for our entire constituency to enjoy.
2. The document is highly theoretical and is not easy to read; complexity and length suggest that most people will not read the document—shorten it significantly; the executive summary needs a plain language re-write.
 3. Page 3: example of too much jargon (linked models, linked decisions, coherence among focus areas)—simplify.
 4. Updates and revisions are commonly a call to action with minimal narrative; this reads more like a white paper. 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 actions scattered throughout the narrative at the end (starting p 26).
 5. Page 4 - Plain language rewrite.
 6. Sufficiency:
 - a. Page 7: 2 years is no time at all 5-10 years is a more realistic time frame.
 - b. Page 13 - Yellow line doesn't show up. Need a different font on axis labels that isn't so blocky.
 - c. 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.
 - d. Page 24 - "Summary of Recommendations" should be changed to "Future Requirements" - it's a stronger statement.
 - e. 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 Plan Committee 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.
 - f. 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.
 7. 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.
 8. 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.

9. Sufficiency:
 - a. The proposed steps are correct.
 - b. I strongly believe that the various waterfowl population objectives established in the original 1986 NAWMP should be maintained. Those are goals that habitat managers should seek to attain through habitat protection, restoration, creation, enhancement and management.
 - c. The population objectives were set for good reasons and I believe those reasons still exist. For habitat managers, the task will not be easy because 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 the attempt to attain the habitat to support the stated population objectives.
10. 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.
11. As articulated, this Draft 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 Draft 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 Draft. 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 Draft will likely be as intensive as the Draft 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.
12. Wetland conservation activities will continue to be an important part of Ontario's waterfowl management strategies. The Draft should acknowledge that implementation of conservation actions is still an important NAWMP activity.
13. Sufficiency:
 - a. 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 Draft ("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?
 - b. 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.

- c. 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?
 - d. This Draft 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.
 - e. 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 Draft, 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.
 - f. 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.
14. The CIJV and PCJV support the recommendations and next steps to move this Draft forward. The bulk of the comments coming from the JVs will likely come from the action plan. Overall this Draft has succeeded in creating a broader vision and the process has successfully included a broader suite of opinions from a variety of NAWMP partners.
15. 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.
16. 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 Draft 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.

17. One of the challenges in evaluating the Draft is in not being able to also evaluate the Action Plan....which presumably has/will have more concrete action steps/options outlined.
18. The last sentence regarding the need to "Confront the Changing Social Landscape" (pg 26) should be highlighted, and stated in the document's front.

From this point forward, unstructured comments are reported virtually verbatim, organized in outline format.

19. 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.
20. NAWMP should be shut down and its budget eliminated. The authors travel the country on American tax dollars provided by working people to plan and support their own lifestyles and murderous activity called hunting.
21. The Atlantic Flyway Council (AFC) would like to commend the Plan Committee for their work on the North American Waterfowl Management Plan Revision (Revision).
 - a. 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 endeavor. 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.
 - b. 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.
 - c. We have several reservations about the current draft.

- i. There is 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 this information needs to be included in the final version.
 - ii. 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.
 - iii. The Revision seems to target the scientific community rather than the lay person to whom the Revision really wants to include as a partner.
 - iv. 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.
 - v. 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.
- d. 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.
 - i. It is not clear 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.
- e. In support of the Revision, we offer the following general comments:
 - i. We agree with the purpose statement and fundamental goals of the Revision. 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.
 - ii. 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.

- iii. 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.
- iv. 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.
- v. 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.
- vi. 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.
- vii. 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.
- viii. 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”).

- ix. 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.
22. 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 respectively submit a number of general and specific comments below.
 - a. 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.

- b. Make the Draft more reader friendly (i.e. define some of the terms, use plain language, and include a bulleted list of actions before the narrative).
- c. 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.
- d. 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.
- e. 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.
- f. 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.
- g. 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.

h. Specific Comments

- i. 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.
- ii. 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.
- iii. Page 11: We recommend "such as Ducks Unlimited in 1937" be removed in an effort not to offend conservation partners.
- iv. 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?"
- v. 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?
- vi. 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).
- vii. Page 17: Again, recommend deleting "Ducks Unlimited" or expanding it to include a few other conservation organizations.
- viii. Page 18: Last paragraph, third line down – strike "is" (.....waterfowl management is depends on.....)
- ix. 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.

- x. Page 19: The third bullet should include "Flyways," "coherence across focus area, Flyways, Joint Venture, and continental scales."
 - xi. Page 20: On the bottom of the page, it should read, "National Wildlife Refuge System" and not the "National Fish and Wildlife Refuge System."
 - xii. 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.
 - xiii. 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.
 - xiv. Page 24: In an attempt to provide a stronger statement, perhaps the heading can be changed from "Summary of Recommendations" to "Future Requirements."
23. 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.
- a. 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.
 - b. 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..."
 - c. 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.
 - d. 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.

- e. 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. 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.”

- f. Several additional considerations that need to be factored into the selection process for the types and locations of projects are:
 - i. 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.
 - ii. Project opportunities: Physical opportunity (landscape, infrastructure, hydrology, etc.).
 - iii. Local/regional partner interest and support.
 - iv. Match: funding availability.
 - v. Long term stewardship arrangements.
 - vi. Land values / real estate costs (i.e., getting the most for the dollar spent).
 - vii. Project quality.
 - viii. Project size and design, quality of the habitat protected.
 - ix. Adjacent habitat considerations.
 - x. Current threats and future risk of impairment.
 - xi. Anticipated use by wildlife.
- g. 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.
 - i. 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.
 - ii. 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.

h. Our specific comments follow:

- i. 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.

1. The proposed NAWMP map shows extreme 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.
2. Goshen Hole in southern Goshen CO is a high priority wetlands complex identified in the Wyoming Wetlands Conservation Strategy. 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.

3. 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.
 4. 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.
 5. 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.
 6. 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.
 7. 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.
- ii. 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. 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%)
- iii. The top reasons cited by hunters for the decline in hunting were (Page 53):
1. 1) Poor health / age (42%)
 2. 2) No time: family or work obligations (32%)
 3. 3) Lack of access, nowhere to hunt (16%)
 4. 4) Not enough game (6%)
 5. 5) Did not want to go (4%)
 6. 6) Complicated regulations (3%)
- iv. 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.
- v. 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.

- vi. 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.
- vii. 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.

- viii. 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:

1. 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.
2. The habitat plan should also address the need for enhanced access and recreation opportunities.
3. Broadening the support base by addressing hunter recruitment/retention and encouraging other publics to become involved in supporting conservation will require:
 - a. Additional public access, especially near urban areas.
 - b. Mentors or "community conservation clubs."

- c. Outdoor skills development programs.
 - d. Assistance with equipment needs.
 - e. A substantial and expensive information and education campaign.
4. 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.
5. 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.
6. 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.
7. 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.

- ix. 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:
 - a. Need for regulatory and incentive-based protection of isolated wetlands.
 - b. Adequate funding for wetlands conservation
 - c. Need for sustained/increased enrollment in CRP, WRP, and other Farm Bill Conservation Programs.
 - d. Waterfowl hunter recruitment and retention. Engagement of nontraditional conservation supporters.
 - e. 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:
 - a. 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:
 - a. Waterfowl hunting participation (develop objectives for this).
 - b. Other wetland-dependent recreation (e.g. bird watching) participation (develop objectives for this).
 - c. Public support for wetlands conservation (develop objectives for this, e.g., % support through surveys).
 - d. 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:
 - a. 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.
 - b. 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. 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.
5. The concept of integrated waterfowl management and the greatest challenges/benefits likely associated with integration:
 - a. 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.

6. Strategies that would make waterfowl management more efficient, effective and responsive:
 - a. 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).
 7. 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. Refer to No. 7 immediately above.
 8. The sufficiency of proposed recommendations and action steps to move this plan forward:
 - a. 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. 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.
24. 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.

- a. 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.
- b. 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.
- c. 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.
 - i. 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.

- ii. 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.
- iii. 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.
- iv. 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.
- v. 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.

- d. Other more specific suggestions follow:
 - i. 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.
 - ii. 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.
 - iii. 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.
 - iv. 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.

- v. 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.
 - vi. 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”?
 - vii. 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.
 - viii. 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.
 - e. 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.
25. 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.
- a. 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.
 - i. 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.

- ii. 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?
- b. 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.
 - i. The Revision seems to target the scientific community, not the lay person, whom it seems the Revision really wants to include as a partner.
 - ii. 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.
 - iii. 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.
 - iv. 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.

26. I offer the following comments regarding some of the nine elements listed as being of particular interest to the Plan Committee:

- a. The greatest challenges facing waterfowl management in the next decade are:
 - i. the competition between the needs of waterfowl and the needs of the existing, and ever increasing, human population for land and water; and
 - ii. stressors to the landscape from climate change.
- b. 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,
 - i. 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.
 1. 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.
- c. 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.

- i. 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".
 - ii. 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.
- d. Regarding aspects of the draft Revision other than the nine elements of particular interest:
- i. 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.
 - ii. 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.

- iii. 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.
 - iv. 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).
 - v. 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.
 - vi. 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.
 - 1. 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.
 - vii. On page 16, regarding the SEIS, it is not only on the hunting of waterfowl.
 - viii. On page 20, shouldn’t National Fish and Wildlife Refuge System be National Wildlife Refuge System?
 - ix. On page 22, the first paragraph uses AHM Task Force, and the second paragraph uses AHM Working Group.
 - x. 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?
27. 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.
- a. 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.

- i. RECOMMENDATION: 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. 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. 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. Allow 8 ducks per day only four of which can be sea ducks. H.I.P shows zero eiders killed in Alaska. Please “Google” Eider hunting in Alaska on the Internet.

- b. 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”. 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. 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 Separate subsistence for food... from sport trophy fun or profit skin hunting. This can be accomplished by the state statutes and process Understand remote commercial hunting lodges and money motivated guides create hotspots of localized depletion on birds with site fidelity. Remove the word “duck” from the vocabulary. Use Tribe names or dabbler, bay, sea duck, whistling duck, etc. “Duck” is obsolete and grossly inaccurate.

28. NAWMP must commit to recognizing marine habitats:

- a. 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.
- b. 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.

- c. 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.
- d. 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.
- e. 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.
- f. 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.

29. Change needed:

- a. There is essential need to comprehensively distinguish and integrate High Latitude Terrestrial and Marine Habitat into Waterfowl Management with a High Latitude Joint Venture.
 - i. Alaska’s 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-20th 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.

- ii. 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.
- iii. 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”.
 - 1. 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.
 - 2. The gaping hole in our NAWMP understanding can be filled with a High Arctic Habitat Joint Venture.
 - a. 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.
- iv. 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.

30. 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.
- a. I 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.
 - b. 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."
 - c. 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.
 - d. I am surprised, however, that while embracing a bold agenda for change on one hand, the Plan Committee remains very traditional on the other.
 - i. 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.
 - ii. 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.
 - iii. 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 Plan Committee has overemphasized the sole importance of hunting and needs to consider such a social paradigm shift in its current vision.
 - e. This apparent overemphasis is mainly expressed in the purpose statement, and I thus recommend revising it accordingly.
 - f. I 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.

- i. 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.
 - ii. 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).
 - iii. 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.
 - iv. “Sound science” is equally vague and could be better described within the context of a clear adaptive management framework.
- g. No mention is made of Strategic Habitat Conservation (SHC), a concept that most Joint Ventures (JVs) utilize in implementing conservation delivery.
- i. 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.
 - ii. 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.
 - iii. 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.
31. 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.

- a. This draft of the Plan is not so much a “revised Plan” as it is a strategy to revise the Plan.
 - i. 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.”
- b. 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.”
- c. The Introduction 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.

- d. We agree with the goals, in general.
 - i. 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.
 - ii. 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.
 - iii. 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.
- e. We like the review of the history of the 1986 Plan and its accomplishments, as written on pages 10-12.
 - i. We think this is necessary and useful for younger readers to fully understand how and why the original Plan was developed.

- ii. 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.
- f. 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.
- g. 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.”).
- h. 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.
- i. 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.
- j. 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.
- k. 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.

- l. 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.
 - m. 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.
- 32. 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.
 - a. 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'.
 - b. 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.
 - c. 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!
 - d. There would be great value in re-activating a federal/national stakeholder wetlands forum – to inform, share information, and gain support for NAWMP.
 - e. 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. Let's remember too that many farmers and ranchers are also hunters.

33. The following will provide additional commentary from Delta Waterfowl on issues not identified in the structured questions.

a. Prioritization (Geographical and Programmatic):

i. 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.

b. Continental Assessment as a Building Block to Adaptive Management:

i. 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.

c. Plan Investments with Dual Outcomes:

i. 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.

d. Recruitment and Retention Strategies:

- i. 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.

- e. 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.

34. 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.

- a. 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.

- b. 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.
- c. 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.
- d. 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.

35. 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.

a. 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.

i. 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.”

ii. 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.

iii. 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.

iv. 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.

36. 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.

a. We have many concerns regarding the draft as it is currently written.

- i. 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.
- ii. 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.
- iii. 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.
- iv. 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.
- v. 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.
- vi. 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.

37. 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.
- a. 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.
 - b. 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.
38. 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.
- a. 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.
 - i. 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.
 - b. The proposed goals themselves can be used as a more specific statement that defines the purpose of the Plan.
 - c. 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.
 - d. 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.
 - i. 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.

- e. 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.
 - i. 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.
- f. 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.
- g. 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.
 - i. 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).
- h. 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.
 - i. 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.

1. 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.
 2. 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.
- i. 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.
 - j. 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.
 - i. 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.
 - ii. 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.
 - iii. 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.
 - iv. 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.

- v. 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.

39. 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.

- a. 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.
 - i. Like other successful plans, the NAWMP continues to evolve to meet new challenges and capitalize on new opportunities.
 - ii. The NAWMP Revision reaffirms the Plan's longstanding goals of abundant and resilient waterfowl populations and habitat sufficient to sustain those populations.
 - iii. 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.
- b. The Association members unanimously supported the motion to endorse the vision and the three goals of the NAWMP revision.
 - i. 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.
 - 1. 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.
 - 2. 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:

- a. Increasing awareness of NAWMP/NAWCA and effective information sharing,
 - b. Creating innovative funding sources,
 - c. Supporting legislative changes (if needed for states to contribute),
 - d. Increasing hunter awareness and support, and
 - e. Building effective partnerships.
 3. The Association believes that the foregoing 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.
40. 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.
- a. 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.
 - b. 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.

- c. 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.
- d. 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.
- e. 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.
- f. 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.
- g. 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.
- h. 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”.
 - i. 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.
- ii. 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.
 - iii. As written, 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.
 - i. 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.
41. 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.
- a. The NAWMP revision should acknowledge the value and potential of this team.
 - b. 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.
 - c. 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.
 - d. 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."
 - e. Page 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.
 - f. Page 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.

- g. Page 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.
 - h. Page 24: The PC should add at least one member from the birding community.
- 42. 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.
 - a. 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.
 - b. 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.
 - i. 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.
 - 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: Achieving effective conservation during a period of challenging economic conditions Influencing land use and land use policies given current trends in food production, biofuels, resource extraction and so on Adapting conservation programs to be effective under climate change.
43. 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.
- a. 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.
 - b. It supports 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.
 - i. 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.

- ii. 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."
- iii. 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. As pointed out in *Scanning the Conservation Horizon: A Guide to Climate Vulnerability Assessment*, 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.

- iv. 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.

44. 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.

- a. 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.
 - i. 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.
 - ii. 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. 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.
 - iii. 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.

- iv. In Appendix B, re: population objectives—the use of population trend should also be considered in the currency of population objectives. 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.
- b. 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).
 - i. 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.
- c. 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.
- d. 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.
 - i. 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:
 1. urbanization and industrialization of traditional wintering areas,
 2. loss or degradation of breeding and wintering habitats,
 3. increases in predator populations, and
 4. bioaccumulation of chemical contaminants.

- ii. The Plan needs to ensure that issues related to population and habitat, not just the human dimension, are given equal weight to perpetuate the theme of “Strengthening the Biological Foundation” as highlighted in the 2004 NAWMP.
 - e. Climate change is only mentioned once in the document (page 15).
 - i. 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.
 - ii. 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.
 - f. 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.
45. 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.
- a. The prominence of a goal to reduce the decline in hunter numbers may not be the most cost effective means to ensure waterfowl conservation.
 - i. 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.
 - ii. 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.
 - b. 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.

- i. 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.
 - c. 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).
 - d. 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. I hope the activities of this group will include social science as well as communications planning as well as education, outreach, and communications activities.
 - ii. I hope I will hear about the opportunity to participate as I would be quite interested in doing so.
 - iii. 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?
46. 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.
- a. The plan calls for bold action, but the problem requiring the bold action isn't quite clear to me.
 - i. I understand habitat is being lost at a rapid rate, yet the numbers of breeding birds is very high.

- ii. I understand hunters are declining, yet the harvest rates are very high.
 - iii. 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.
 - b. I get the sense that one of the most serious concerns is the loss of hunters, and interest in hunting generally.
 - i. 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.
 - 1. 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.
 - ii. To that end, be sensitive in the plan about language. The plan, as written, seems aimed at hunters first, and mentions other users secondarily.
 - c. The document is process heavy. It includes much about need for integration, models, working multiple scales, engagement, study groups, task forces, metrics, and reports.
 - i. 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.
 - ii. 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”.
 - d. Appendix B, Population status and abundance objectives, was very interesting to me.
47. 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.
- a. 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.
 - i. 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.
- ii. The social, physical and biological landscape has changed. The North American human population is more urban, electronic focused and less connected to natural resources.
 - iii. 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.
 - iv. The government policies and funding sources that have been the foundation of our work are now shifting sands.
- b. 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.
- i. We remain committed to the conservation of both waterfowl populations and the habitats upon which they depend.
 - 1. 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.
 - 2. We thank the plan committee for their efforts and the opportunities to participate in the process.
 - 3. 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 and 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.

48. 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.
- a. I am most definitely a contributor of the waterfowl resource yet I have no rights as a shareholder.
 - b. 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.
 - i. 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.
 - ii. 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.
 - c. From this revision, it appears that others have noticed these problems also.

- i. 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.
 - ii. 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.
 - iii. The State can and has set the precedent for setting wildlife regulations separately for Subsistence, personal use, sport of trophy, and commercial hunting.
 - 1. 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.
 - 2. 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.
 - 3. Managers need to be educating these gunners rather than joining them in unsustainable shooting.
49. 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.

- a. The three goals of waterfowl management in the NAWMP Revision represent a fundamental change from the original North American Waterfowl Management Plan.
 - i. 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.
 - ii. We recognize this will require substantial changes in how we do business.
 - iii. 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).
 - 1. The NAWMP Revision needs to make a stronger case for forming such a HDWG 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.
- b. 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.
 - i. 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.
 - ii. 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.
- c. We look forward to working with partners to:
 - i. establish a Human Dimensions Working Group,
 - ii. develop hunting, viewing, and conservation participation objectives,
 - iii. implement management actions to achieve hunter, viewer, and conservation participation objectives, and
 - iv. design appropriate monitoring programs.

- d. We also support the general structured decision making framework being proposed in the NAWMP Revision.
 - i. 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.
- e. 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.
 - i. Will this be explained in the Action Plan?
 - ii. Would it be possible to include some examples of how our current system is not integrated and coherent?
 - iii. How will increased integration make management more efficient and effective?
 - iv. As written, it is difficult to assess how a more integrated system will benefit waterfowl management.
- f. The NAWMP Revision encourages the formation of an Integration Technical Team (ITT) to provide the technical expertise.
 - i. 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.
 - 1. 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.
 - 2. At the federal level, it will also be important to consider how Canada and Mexico may be included on this ITT.

g. Editorial comments:

- i. Individuals who reviewed the document commented that the NAWMP Revision did more selling than telling and was too dramatic.
- ii. 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.
- iii. 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.
- iv. 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.
- v. They offered two cautions.
 1. First, they cautioned to either include multiple conservation organizations or no conservation organizations rather than mentioning only Ducks Unlimited.
 2. 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.
- vi. 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.
 1. 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.
- vii. Use 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. Be more consistent in describing 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.

- viii. 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.
 - ix. 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.
 - h. 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.
50. 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.
- a. The IWJV supports the purpose statement and fundamental goals identified in the Revision.
 - i. The Revision establishes, from the outset, a remarkably clear vision that is framed by three powerful fundamental goals.

1. 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.
- b. 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.
 - i. 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.
 - ii. 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.
- c. 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.
- d. In support of strengthening the Revision, we offer the following observations/suggestions:
 - i. 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.

- ii. 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.
- iii. 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.
- iv. 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.
- v. 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.
- vi. 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).
- vii. 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).

1. 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.
 2. 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.
 3. 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 “revisions” the waterfowl management enterprise.
 4. 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.
- viii. 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.
1. 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.
- ix. 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.
1. 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).
2. 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).
- x. 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.
1. Development of a Human Dimension Working Group will likely be the most efficient means to address sociological questions surrounding waterfowl and wetland stakeholders.
 - a. Integration of human dimension components will need to be accomplished without jeopardizing resources for the other 2 legs of the stool.
 - b. 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.
- xi. 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.
1. 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.

2. 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).
3. 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.

51. 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.

- a. 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.
 - i. 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.
 - ii. 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.
- b. We believe that assertions regarding the current inefficiencies and other problems inherent in waterfowl management are not well supported.

- i. 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.
 - c. The lack of any mention of biology, ecology, and conservation of waterfowl in a plan that focuses on these topics is disconcerting.
 - i. The focus seems to be on generalities regarding the management paradigm rather than on the birds.
 - ii. 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.
- 52. 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.
 - a. 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.”
 - i. 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?
 - ii. Waterfowl Populations and Habitat – so intrinsically linked yet so institutionally divided; how is it thought that we will bridge this gap?
 - iii. 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?
 - iv. The Joint Venture is interested to learn what is planned for the Human Dimensions Working Group.

- b. 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.
 - i. 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.
- c. The EHJV partners would however like to share several specific comments with the Writing Team:
 - i. 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.”).
 - 1. 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.
 - 2. 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?
 - ii. 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?
 - iii. 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.

- iv. 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.
- v. 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.
- vi. 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).
- vii. The EHJV strongly supports a continued focus on and investment in habitat conservation.
- viii. 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.
 - 1. 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.
- ix. 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.

53. 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 25th 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. 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.

- a. This document falls well short of being a management plan.
 - i. 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.
 - ii. 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.
- b. 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.
 - i. 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.
- c. Addressing continued habitat loss, particularly in areas with higher development pressure, and pursuing continental restoration objectives could stand out more from a thematic standpoint.
 - i. 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.
- d. 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'.
 - i. Some of the 'weedy' and 'uncertain' parts could be trimmed and moved to the "Action Plan".

- e. 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.
 - i. 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.
- f. 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.
 - i. 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.
- g. Specific Comments:
 - i. 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.
 - ii. 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.
 - iii. 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.
- iv. 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.
 - v. 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.
 - vi. 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.
 - vii. 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.
 - viii. 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.
 - ix. 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.
 - x. 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).

- xi. Page 15: Adapting to change, 5th bullet – Energy activities have increased without question, but evidence of impacts on waterfowl populations is scarce.
- xii. Page 17: top paragraph: Mention of continuing loss of prairie wetlands in Canada would have been an urgent policy issue to highlight.
- xiii. 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.
- xiv. Page 18, second paragraph: so, the new chapter in management will focus on hunters, social and environmental change and habitat...in that order...really?
- xv. Page 18: Not quite sure what the statement “contemporary waterfowl conservation could be more effectively addressed with greater forethought, planning and facilitation”, means.
- xvi. 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”.
- xvii. 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.
- xviii. 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.
- xix. Page 20, paragraph 4: a good example of ‘too much detail’ and pre-scripting how things will work.
- xx. Page 21: first paragraph – all the language about state-this or state-that is quite U.S.-centric.
- xxi. 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.
- xxii. 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.

- xxiii. 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.
- xxiv. 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.
- xxv. Page 25: “The need for an integrated management system is apparent”. A stronger case for this necessity needs to be made within the document.
- xxvi. 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.
- xxvii. 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.
- xxviii. 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.
- xxix. 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.

- h. Final Thoughts: The process of holding workshops and engaging partners in a consultative process was a positive approach to this re-write.
 - i. Trying to synthesize those comments into a succinct document was undoubtedly a difficult task.
 - ii. 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.
 - iii. 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.

54. The Arctic Goose Joint Venture appreciates the opportunity to comment on the draft revision document.

- a. 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.
 - i. 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.
 - ii. The fundamental premise of this revision – integrating harvest and habitat management – is not particularly relevant to Arctic nesting geese.
- b. 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.
 - i. Geese are important continentally for both harvest and viewing.
 - ii. First Nations subsistence harvest and harvest related to over-abundant species are important aspects of the human dimension component.
 - iii. 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.
- c. 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.
 - i. 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.
 - ii. 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.
 - d. 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.
 - e. Specific Comments:
 - i. Consider removing “perpetuate waterfowl hunting” from the vision statement as this is included in “human desires”. 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...”.
 - ii. 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”.
 - iii. 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.
 - iv. 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.?
 - v. 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.

- vi. 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.
- vii. 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.
- viii. 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).
- ix. Page 21, 4th paragraph: JVs for habitat and species conservation.
- x. Page 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.
- xi. Page 30, does not take into account the surveys done in the Arctic.

55. 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.

- a. 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.

- b. 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.
- c. 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.
 - i. 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.
- d. 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.
 - i. 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.
- e. The IDFG understands the decline in waterfowl hunter numbers has continued independent of hunting regulations.
 - i. 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.
 - ii. The Revision recommends 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.
 - iii. Furthermore, the Revision recommends that a Human Dimensions Working Group and an Integration Technical Team be established to accomplish this task.
- f. 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.
 - i. 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.

- g. 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).
 - i. 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.
 - ii. Past revisions of the NAWMP have provided that clear vision for everyone interested in waterfowl management and habitat conservation.
 - iii. The revised NAWMP plan should engage and encourage collaboration among State and Federal agencies, Joint Ventures, Non-Governmental Organizations and policy makers.
 - iv. The plan should provide a clear message of what integrated waterfowl management means to current and potential stakeholders.
 - h. The IDFG also believes the Revision should emphasize the accomplishments achieved through the NAWMP to date.
 - i. It is important to acknowledge these accomplishments as we face the changing landscape of waterfowl management and wetland conservation.
56. 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:
- a. 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.
 - b. In the 2nd 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.
 - i. 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.
 - c. The purpose statement describes achieving goals through “partnerships guided by sound science” yet none of the three accompanying goal statements supports that purpose.

- i. 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.
 - d. 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.
 - e. 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.
 - f. Specific comments which apply to Appendix B:
 - i. Figure 1. needs to present and describe the EWS
 - ii. Table 1. Due to recent corrections to the Eastern Waterfowl Composite estimation process the American Black Duck (ABDU) goal should be [commenters offer specific changes—see exact comment for details].
 - g. 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.
 - i. 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.
57. 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:
- a. 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.

- i. 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).
- b. The Purpose and Goals should be reviewed and reworded to be more inclusive of the diverse needs of all Joint Ventures and jurisdictions.
 - i. 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.
 - 1. We suggest the first goal should speak to the health, abundance, and resilience of waterfowl populations without reference to people or habitats.
 - 2. The second goal should speak to the wide array of healthy habitats, including wetlands, uplands, coastal, etc. required to sustain healthy populations.
 - 3. The third should focus on the need for a strong societal base that understands and appreciates waterfowl and their habitats.
- c. 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.
 - i. 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.
- ii. 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.
- d. 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.
 - e. 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.
 - i. 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.
 - ii. We hope that all jurisdictions and JVs have an opportunity to provide input and help guide this effort.
 - f. 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.
 - i. 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.
 - g. 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.

- i. 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.
 - h. 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).
 - i. 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.
 - i. 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.
 - j. 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?
58. 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.
- a. As regards the Greater Snow Goose, the CWS Migratory Birds Regulatory Report Number 29 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.
 - i. 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.
 - ii. 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.
- iii. 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.
- b. 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.
- i. 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.
 - ii. 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.
- c. 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.
- i. This change in behaviour has created a situation where agricultural producers are confronting damage to their major crops.
 - ii. Farmers are also noting an increased presence of Canada Geese in several parts of Quebec where they were not previously found.
- d. The UPA is aware of the efficiency and importance of hunting as a means of managing wildlife populations.
- i. 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.
 - 1. 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.
 - ii. 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 means to reduce damage to crops.
 - iii. 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.
- iv. However, although the program was implemented, it only covers part of the farmers' actual losses.
 - e. 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.
 - i. 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) 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.
 - ii. 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.
 - f. Specific Comments:
 - i. 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."
 - 1. 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.
 - ii. In the consultation document, the three goals that were determined as critical to the success of the revised NAWMP read as follows:
 - 1. Goal 1: Abundant and resilient waterfowl populations to support hunting and other uses without imperiling habitat.
 - 2. 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.

- 3. Goal 3: Growing numbers of waterfowl hunters, other conservationists, and citizens who enjoy and actively support waterfowl and wetlands conservation.
 - iii. 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.
 - 1. 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.
 - g. 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.
 - i. 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.
59. 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.
- a. Similar to our past input, Council generally agrees with the proposed Vision statement.
 - i. 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.
- ii. 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.
- b. Council was satisfied with the 3 goals proposed in this draft of the Revision.
- i. We realize that defining these goals was not an easy task given the breadth of concerns, interest and opinions among the waterfowl management community.
 - ii. 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.
 - iii. For example, Council had initial concerns about incorporating ecological goods and services as a fundamental objective.
 - 1. 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.
 - 2. In goal #2, incorporating ecological services into a larger waterfowl habitat goal captures those values of wetlands without changing the focus of the Plan.
 - iv. Council also was pleased to see the formal incorporation of a human dimension or use (i.e., #3) goal into the Revision.
 - 1. 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.
 - 2. 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.
 - 3. 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.
 - v. 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.

1. 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.
- c. 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.
 - i. 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).
 - d. 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.
 - i. 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.
 - ii. 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.
 - e. From that perspective, the recommendations provided in the draft Revision primarily point to a major shift in the current paradigms of waterfowl management.
 - i. 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.

- f. 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.
 - i. 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.
 - ii. 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.
- g. In the next decade, we believe the issues and demands on the waterfowl management community will be extremely complex and difficult to address.
 - i. Ongoing and continued loss of waterfowl habitat appears to be the biggest and most ominous threat.
 - ii. 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.
 - iii. We also expect that, within the next decade, the recent wet period observed on the prairies will cease, which will only exacerbate habitat losses.
- h. In light of habitat loss, Council sees the next decade as pivotal to the issue of waterfowl hunter recruitment and retention.
 - i. 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.
 - ii. 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.
 - iii. 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.