Dear Mr. Humburg:

The Intermountain West Joint Venture (IWJV) appreciates the opportunity to comment on the North American Waterfowl Management Plan (NAWMP) Interim Integration Committee’s (IIC) Work Plan and straw-man objectives. We recognize the challenges the IIC faces in advancing this new approach to the waterfowl management enterprise but are soundly committed to doing our part to implement the 2012 NAWMP Revision and Action Plan at the JV scale. We have some thoughts on the Work Plan but will also use this opportunity to, first, update the IIC on the work that our JV has undertaken over the last year in this arena, as our experiences might be instructive to the IIC in fleshing out NAWMP objectives at different scales.

**IWJV Commitment to NAWMP Revision Implementation**

The IWJV Management Board is the most diverse of all JV Management Boards, with participation by state and federal agencies, non-governmental organizations, corporations, and private landowners. The Intermountain West contains some of the most important places in North America for waterfowl – e.g., Southern Oregon and Northeastern California (SONEC) and Great Salt Lake (GSL) – and we are heavily invested in science-based waterfowl conservation planning and habitat delivery in those areas. However, our collective JV engine is driven by a commitment to natural resources conservation that is far broader than waterfowl, or even wetlands, conservation. This is reflective of the priorities of our state fish and wildlife agencies and other partners, and the reality that even in key areas for waterfowl we have access to very little “dedicated” waterfowl funding (e.g., Migratory Bird Conservation Fund, state duck stamp revenue). Nevertheless, the Management Board holds NAWMP in high regard and has committed a substantial amount of time to exploring “integration” at the JV level. We also have one of the most advanced JV strategic communications and human dimensions efforts, with strong connections to science and habitat delivery objectives, which prepares us to engage in some of the new aspects of the NAWMP implementation in the future.

First, we dedicated the time of our JV Coordinator (JVC), Dave Smith, to serve with two other JVCs as part of a NAWMP JV Liaison Team designed to spur engagement by the JV community in the work of the IIC, including preparation of a JV engagement matrix that was recently submitted to the IIC. Next, we engaged the Management Board in thinking through NAWMP objectives and recommendations via
separate sessions at our Spring 2013 and Fall 2013 Management Board Meetings. We provided the Management Board with the IIC Work Plan and subsequently formed ad hoc working group comprised of two Management Board members and our JVC; they thoroughly analyzed the IIC Work Plan and straw-man objectives and prepared the comments submitted herein.

At our Spring 2013 Management Board Meeting in Salt Lake City, Dr. Mike Anderson and our JVC led a 2.5-hour session on 2012 NAWMP Action Plan implementation. We assessed opportunities for integrating objectives for waterfowl populations, waterfowl habitat, and people in three landscapes – SONEC, GSL, and the Snake River Plain of Eastern Idaho. The session illuminated the need for integration of habitat and people objectives at the JV scale, and demonstrated how those efforts might vary among landscapes within a JV, as described below.

- **Great Salt Lake**: The GSL sits on the doorstep of a major metropolitan area and presents an array of opportunities for increasing support for wetlands conservation, especially relative to key public policy issues (e.g., water quantity, water quality, and invasive species management) that are central to achievement of JV habitat objectives for the GSL. For example, the GSL results in atmospheric conditions that makes for some of the best snow in the world, a service with significant implications for the ski resort and outdoor recreation industries. Likewise, it offers some high quality waterfowl hunting and essentially limitless opportunities for expanded bird watching and youth environmental education. The session raised a couple intriguing questions: Can we develop people objectives aligned with our habitat objectives that will enable the JV partnership to be successful in sustaining water supplies, water quality, and wetland productivity at the GSL? If so, what would those people objectives look like? We are currently exploring some of the ideas that came out of this session. For example, which types of people would need to take action to contribute to our habitat objectives? In addition to action-oriented objectives with measurable outcomes, what knowledge, attitudes, or skills objectives would need to be achieved before we will see these groups of people take action? While it was abundantly clear that objectives useful for application at the GSL would not be devised at the continental level, we are cognizant of the need for coordination amongst the NAWMP community on people objectives. As such, we have been waiting – right or wrong – for guidance from the IIC, Objectives Committee, and/or Human Dimensions Working Group before investing time in establishing specific people objectives.

- **SONEC**: The SONEC region, one of the most important spring staging areas for waterfowl in North America, is located in a remote area with limited potential for increasing waterfowl hunting or viewing. The bulk of the spring migration habitat occurs on the hay meadows of working cattle ranches, and the flood-irrigation practices used for hay production line up perfectly with waterfowl needs during spring migration and, to large degree, during the subsequent breeding season. While we generally know what needs to be done from a habitat conservation standpoint (maintain flood-irrigation on private lands in key landscapes), we haven’t explicitly addressed some pressing questions in the social sciences arena. What do ranchers need to stay in the business of flood-irrigation? How could the value of flood-irrigation to waterfowl be effectively articulated to regulators and others that currently view the practice as an archaic, wasteful use of water? How can conservation programs be adapted to help ranchers support this irrigation practice, and, thereby, sustain the energetic carrying capacity of this vital spring staging area? What is the best means to articulate the value of Farm Bill programs in this area to NRCS leadership? The IWJV has already demonstrated leadership among JVs for strategic communications and is poised to take the next step of integrating actual
social science information into the human dimensions elements of our SONEC work – rather than the expert opinion it’s been based on to date. Connected to JV habitat objectives, this appears to be fertile ground for future JV work.

In summary, the IWJV has focused substantial energy, to date, on the classic waterfowl work of JVs – stepping down continental population objectives to the JV scale, developing habitat objectives, and building private-public partnerships to deliver habitat conservation. Yet, to be successful in meeting our objectives we will need to garner increased support from specific audiences who we need to foster conservation activities in key landscapes for waterfowl, spur landowner engagement in conservation programs (likely framed by ecological goods and services or other reasons beyond waterfowl), and secure enhanced funding from Farm Bill programs or non-traditional sources to achieve our established habitat objectives. Clearly, the IWJV will need to work at the intersection of habitat and human dimensions in these endeavors.

IWJV Comments: IIC Straw-man Objectives and Work Plan

The IWJV’s NAWMP Implementation Ad Hoc Working Group provides the following thoughts and suggestions to the IIC:

Straw-man Objectives for Waterfowl Populations

- We are unequivocally united in our belief that continental waterfowl population objectives are an essential tenet of NAWMP. We have stepped down the current population objectives to the JV scale, applied biological models to develop explicit habitat objectives, and witnessed the power of that approach in motivating waterfowl habitat conservation investments. Absent continental population objectives, our JV waterfowl habitat objectives would become a regionally-based, expert-opinion view of what is needed to conserve waterfowl populations. Inherently, those objectives would drift into the haze of yet another wish in a long list of nice things to do for wildlife – not very compelling.

- We can deal with adjustments in continental population objectives so long as those objectives are established in a manner which can stepped down to the JV scale and applied to biological models that result in defensible habitat objectives. Our waterfowl planning experience is currently limited to utilizing population objectives expressed in terms of abundance.

- The objective, Duck populations within the range estimated during 1997-2012, did not make a great deal of sense to us, as follows:
  - Why would NAWMP establish population objectives as a range when a primary (albeit not the only) purpose of that population objective is to develop habitat objectives sufficient to maintain waterfowl populations at desired levels under periods of favorable environmental conditions (e.g., wet years in the PPR)? This could result in non-breeding JVs arbitrarily picking a population objective in that range from which to base JV waterfowl conservation planning? Granted, JVs could use the bounds of those population objectives to also develop ranges of habitat objectives. Obviously, this creates some communications challenges and is not as simplistic as past planning models. The debate between ranges or fixed population objectives has more to do with the social components of conservation – i.e. it will be more challenging to “sell” a range than a static objective.
How is arbitrarily picking this time period any different than arbitrarily picking the time period of the 1970s?

If NAWMP is an adaptive enterprise, as stated in the Revision, then why would we establish habitat objectives around species that are over current NAWMP goal levels and essentially give up on conserving habitat for species below current NAWMP goal levels? Alternatively, why wouldn’t we re-double our efforts to address the needs of species below current NAWMP objectives? Obviously, the IWJV is heavily invested in conservation planning for Pacific Flyway pintails; they are the most abundant species in our key non-breeding landscapes. The 1997-2012 objectives would greatly diminish our need to conserve habitat for pintails and other waterfowl at two of the most important places for waterfowl in North America – SONEC and the GSL. Again, this gets to the social components of conservation. We likely get more mileage out of telling the story of conservation need/action for species like pintail and scaup that are below NAWMP goals.

**Straw-man Objectives for Waterfowl Habitat**

- We agree with the objectives and assumptions laid out in this section. As described above, the IWJV Management Board wrestled with many of the key questions posed by the IIC, albeit before the Work Plan was even released, during our special session at the Spring 2013 Management Board Meeting. We have some ideas on how to move forward at the JV scale and stand ready to work with the IIC and other NAWMP teams to flesh out some of these issues.

- We have some concern about the premise as stated: Habitat – while sufficient today – is not secure and is being lost at an unacceptable rate. It may be sufficient at the continental level for most waterfowl species as evidenced by record continental BPOPs, but there are certainly instances where habitat is not sufficient to meet current NAWMP population objectives. Further, current trends in habitat conditions (e.g., related to the water supply crisis in the Central Valley) could dramatically alter how waterfowl use the Pacific Flyway, which could have continental impacts. We suggest exercising some caution in how that premise is communicated.

**Straw-man Objectives for Waterfowl Supporters**

- The draft objective entitled, Increasing (X %) federal duck stamp revenue (from 1997-2012 average – assuming that new programs encourage or require duck stamp purchases for non-consumptive uses). Increase and maintain funding for NAWCA, Conservation Title of the Farm Bill, LWCF, and other waterfowl conservation funding (X levels by the year X), seems a bit idealistic. These are logical end-game objectives (i.e. more funding for waterfowl habitat conservation) but we struggle to see how they would be addressed by the NAWMP community beyond the work of the government affairs staff members of DU, AFWA, etc. Further, how would progress toward these objectives be evaluated? We support the direction here and are as engaged as any JV in supporting strong federal conservation funding (e.g., using non-federal JV funds for private landowner fly-ins to DC), but it is a fuzzy world when it comes to objectives, actions, and measurable outcomes. Specifically on this draft objective, our team was opposed to the statement of increasing federal duck stamp revenue. Increasing duck stamp sales could be an objective of the NAWMP community but increasing the price of the stamp is simply a legislative strategy that certain JV partners will support and others may not. It isn’t the unifying stuff of a NAWMP objective. Note: Even doubling federal duck stamp revenue wouldn’t help
waterfowl habitat conservation in the Intermountain West, due to how funds are allocated, water supplies, and refuge acquisition boundaries.

- We understand why draft objectives were built around waterfowl hunters and viewers – these are logical segments of society that benefit directly from wetlands and waterfowl conservation. However, in our part of the world, actions to grow numbers of waterfowl hunters and viewers would need to be implemented within a much broader context, so we would necessarily integrate waterfowl hunting and viewing objectives into larger, well-established efforts to expand hunting, fishing, and other forms of wildlife-associated recreation. Our state fish and wildlife agencies are heavily invested in answering the following question: How are we going to support wildlife conservation in the 21st century? The one thing that is becoming clear is that it won’t be solely on the backs of traditional constituents. Clean water and open space are primary drivers of wetlands conservation in large portions the Intermountain West, more so than duck hunting and birdwatching. Thus, the opportunity exists for us to strategically establish people objectives around those issues. For the IIC’s consideration as a NAWMP objective and/or simply a regional twist on a continental objective, we offer the following Draft Objective:

  - Integrate waterfowl and wetlands into larger efforts to maintain/increase participation in all aspects of outdoor recreation that drive support for conservation (e.g., hunting, fishing, clean water, open space).

- Likewise, building support for waterfowl conservation might be more far-reaching than is currently stated in the NAWMP recommendation: Build support for waterfowl conservation by reconnecting people with nature through waterfowl, and by highlighting the environmental benefits associated with waterfowl habitat conservation. This recommendation inherently focuses on a “general public” that could be inspired by connecting with nature and/or learning about the ecological services of wetlands. Yet, as JVs are becoming more adept at strategic communications, one of the first pages that playbook is to avoid targeting a general public in any communications work. It is imperative that we delve in to understanding specific audiences and strategically tailoring our communications. It seems important to avoid the “general public or citizenry” trap in the setting of NAWMP objectives.

- As the IWJV Management Board NAWMP integration session revealed, at least in certain landscapes, waterfowl habitat objectives may need to be explicitly framed within the context of private landowner needs. The NAWMP community tends to think in terms of what we need for birds, not what landowners need to provide the habitat needed by birds. In the PPR, SONEC, or other portions of the Intermountain West, waterfowl habitat objectives could essentially be expressed in terms of sustaining ranching and historic ranch management practices. Conservation delivery could be, and already is in some places, targeted at addressing the “vital rates” of ranching (e.g., agricultural economics, regulatory assurances, and infrastructure). In SONEC, we are launching a new initiative to help flood-irrigators repair and upgrade aging infrastructure (e.g., delivery ditches, headgates) to help them stay in the business of wild-flooding wet meadows in spring for subsequent annual hay production; these wet meadows play a key role in supporting 80% of the Pacific Flyway’s dabbling ducks during spring migration. Meanwhile, traditional habitat conservation programs such as the Wetlands Reserve Program have been available and under-utilized, indicative that what motivates a farmer in Louisiana may be far different than what motivates a rancher in Montana. Regionally-tailored conservation programs appear to be the way of the future in our region. However, we need to build a more
explicit understanding of the social issues that influence landowner participation to best devise and target such programs – in essence, establish people objectives for habitat conservation. Landowner engagement in conservation programs could be one of the most clear-cut examples of support for waterfowl habitat conservation. As such, we suggest that the IIC, Objectives Committee, and/or Public Engagement Team consider private landowner engagement in habitat conservation as a potentially important and measurable objective for waterfowl supporters.

**IIC Work Plan**

We support the direction outlined in the IIC Work Plan, as it identifies a logic course of action. However, we are concerned that time is slipping away. Absent unified objectives and the inspiration that can be generated by communicating a powerful North American waterfowl conservation plan, we are teetering on the edge of the NAWMP community losing the momentum that was generated from 2009-2012. This is not an indictment of any specific faction of our community or the work of the IIC; it is simply a reflection that we need to move forward with some objectives.

From our vantage point, we believe that a unified model of everything, as might have been suggested in all the “coherence” discussions, is not likely to materialize anytime soon. As such, it is incumbent upon the NAWMP community to come together on some “petri dish” approaches that can be implemented at different scales. The IWJV stands ready to apply our trademark innovation – after all, we apply waterfowl habitat conservation without much in the way of direct waterfowl funding – to the IIC and rest of the NAWMP community in any way that you all think would be helpful.

Foremost, we sincerely appreciate the dedication and resolve of the IIC to tackle this challenging set of issues. Our comments represent constructive criticism on a few issues but please take that in the appropriate context – we are simply offering some insight from our unique vantage point of a diverse JV partnership working across a large swath of western North America. It is safe to say that had the NAWMP not established the need for people objectives, we probably wouldn’t be looking at JV work through the lens we are today. Again, please call on us at any time to support the collective efforts of the NAWMP community.

Sincerely,

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