
PACIFIC FLYWAY COUNCIL

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Dale Humburg, Chair of the IIC
Attn: NAWMP Draft Work Plan Comments
4401 North Fairfax Drive MS4075
Arlington, VA 22203

Plan Committee:

The Pacific Flyway Council (PFC) would like to thank the Interim Integration Committee (IIC) and Plan Committee (PC) for providing our group with an opportunity to review and comment on the Draft Work Plan of the IIC for the North American Waterfowl Management Plan (NAWMP).

The PFC agrees with the three major action concepts contained in the draft plan, i.e. the review of waterfowl population objectives within an adaptive management framework, the need to sustain or expand the level of waterfowl supporters and the recognition of the role of habitat protection towards NAWMP conservation goals. The PFC is already engaged in all three fronts and the work proposed by NAWMP will clearly benefit our activities and programs. We believe that greater integration of these three concepts is desirable and should proceed within existing management structures, rather than through creation of a new higher level organization.

At the general level, we believe the draft working plan lacks specifics on delivery mechanisms for the proposed actions. We feel these are necessary to identify and better scope the implications of what is being proposed. Our detailed comments are grouped according to the template used in the draft and outline more specific views or key considerations the PC should consider.

Objectives for Waterfowl Populations

The PFC feels that waterfowl population objectives should be clear and measureable. Harvest management and habitat conservation goals should be associated with a single-value population objective rather than a range as proposed. The range approach is fundamentally different than the discrete population goal approach currently used in most PFC management plans. The creation of NAWMP goals based on ranges can disconnect continental goals from our management plans. This will add an administrative and technical burden to a system that is already quite complicated, which is contrary to our stated collective desire to simplify the existing system. We also foresee major communication challenges to explain the use and relevance of ranges to our constituents (e.g. explaining the rationale for the lower threshold value for Northern Pintail).

The use of ranges might affect management and delivery programs and we would like more discussion on the habitat implications of using a range. For example, the current draft is unclear as to what will happen at the lower and upper bounds of the established ranges. Possibly, upper and lower ranges might trigger different habitat goals and habitat delivery programs. This might

reduce consensus on conservation objectives, e.g. by generating disagreement as to whether conservation and management efforts should target lower or upper bounds of the range. Some PFC Management Plans use ranges, primarily in the context of harvest strategies and management prescriptions but these ranges are still associated with discrete population goals. Ranges are useful for small populations but we do not see how the concept can be applied to continental populations and integration with habitat delivery and human dimension goals. Both technical and management advantages of the range approach are not spelled out and the argument to move to this approach is not compelling. Should the range approach be implemented, we foresee the need for substantial efforts to integrate the approaches at the technical level and to communicate the rationale of the change to our constituents. The range approach should not be implemented without additional human dimensions evaluation, such as proposed in the new stakeholder survey.

The draft is ambiguous and contradictory regarding habitat and its relationship to population goals. The draft states that “*recent population estimates are a result of favorable environmental conditions rather than secure and dependable habitat*” (page 3) while also stating that “*habitat extent and quality can be maintained*” (Assumption 2, page 4). The statements indicate that current robust populations are not related to habitat conservation efforts (i.e. disconnect between management efforts and population response) but that habitat programs are and will be effective at maintaining both habitat extent and quality to support these. The statements cast a doubt on the usefulness of habitat conservation to deliver population goals while over-stating our ability to manage habitat extent and quality. The PFC does not believe that either Joint Ventures or the flyway can “maintain” habitat extent and quality at the landscape level because of the dynamic nature of habitat conditions. We would like to see positive and realistic language on the role of habitat. Specifically, the draft should recognize and address the possibility that less favorable habitat conditions will be encountered and ongoing habitat losses argues for more secure habitat.

The draft recommends that population objectives be reviewed more often and include an adaptive decision framework (Assumption 4, page 4). The PFC does not understand how this adaptive framework would be compatible and integrated with the current harvest management framework. The regulation setting process is already arduous and the inclusion of a new set of NAWMP considerations will increase complexity. The PFC does not support any process that further complicates the current regulatory process.

The benefits of a frequent review of population goals are also unclear. Increasing the frequency of revision might be detrimental to habitat protection programs that work on a much longer time-frame. For example, JVs may have to continually review/update their habitat goals in response to changing population goals. The working plan does not provide sufficient information to determine how this approach will be beneficial to habitat conservation programs.

The PFC would like the draft to provide more information on how population objectives are set for recognized populations and management stocks. The development of the mid-continent and western mallard models has highlighted the need and usefulness for regional population and habitat goals. The draft does not address how the western mallard model fits with the population objectives proposed for the mid-continent region. The Pacific Flyway would like the work plan to recognize both the mid-continent and the western mallard stocks in order to establish a population objective for western mallards. For geese, we recommend that NAWMP reference existing Pacific Flyway management plans rather than develop a parallel process.

Objectives for Waterfowl Supporters

The PFC endorses the approach outlined in the draft on how to increase waterfowl supporters. While we recognize declines in waterfowl hunters and the need to increase non-hunting supporters, we believe that NAWMP and waterfowl managers should increase emphasis on wildlife and wetland supporters while continuing to focus on and emphasize hunters and their contributions. Human dimensions should be part of the feed-back loop and should continue to be used as a tool that informs and guides management without driving it.

Objectives for Waterfowl Habitat

The PFC has concerns with respect to the habitat conservation framework presented in the draft. Habitat is described as “*sufficient today although not secure and being lost at an unacceptable rate*” (page 6) and management efforts and tools are deemed adequate to insure that “*habitat extent and quality can be maintained (Assumption 2, page 4)*”. The PFC views natural wetland losses as very significant and ongoing (e.g. over 95% wetland losses have already taken place in California) and carrying capacity is to a large extent now dictated by cereal grains and agricultural practices that we have little control over. The PFC recommends that population and habitat objective assumptions be reviewed to capture more realistic scenarios of drought, wetland losses and changes in landscape use (e.g. crop types).

Overall, the PFC does not support any process that will promote further complexity to the regulatory, administrative or technical aspects of waterfowl and habitat management; unless there is solid and compelling evidence that effective population and/or habitat management programs will result. The PFC would like to see a draft work plan that does not increase the complexity of the current adaptive and administrative frameworks.

The PFC has a long history of partnership with NAWMP and we would like once again to express our appreciation for the conservation and leadership work provided by NAWMP, the IIC and the PC. The PFC supports and values NAWMP initiatives and looks forward to continued dialogue and interactions on plan implementation.

Sincerely,

A handwritten signature in cursive script that reads "Mike Fowlks".

Mike Fowlks, Chair
Pacific Flyway Council