



**COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA GAME COMMISSION
BUREAU OF WILDLIFE MANAGEMENT
GAME BIRD SECTION**

911 Big Spring Road, Shippensburg, PA 17257 Fax & Tel: 717-776-7337

December 21, 2006

Mr. Seth Mott
Chief, Branch of Science and Planning
Division of Bird Habitat Conservation
U.S. Fish and Wildlife Service
4401 N. Fairfax Drive, Stop 4075
Arlington, VA 22203

Dear Mr. Mott:

Thank you for the opportunity to participate in the requested peer review of the North American Waterfowl Management Plan Continental Progress Assessment draft report. The writers of the report are to be commended for a professional, well-organized document that evaluates the first 20 years of conservation efforts under the Plan and makes recommendations for future improvements to obtain Plan goals and objectives.

The review process described in the report, which obtained information from interviews and questions directed to the Joint Ventures and Flyway Councils, was an appropriate and an effective method for identifying the strengths and weakness of the plan as well as measuring success and effectiveness. I found the report to be based upon sound science with supporting documentation of methods and inferences drawn from waterfowl population and habitat data. The major findings and recommendations presented are scientifically valid and based upon the best information that is currently available, although the report recognizes the need for a stronger biological foundation in many areas. I found the recommendations to be consistent with the information presented in the report. The following are my specific comments on the assessment.

- 1) Page 16, line 556 – The use of these biological models need to reflect actual conditions including environmental variation and need to account for changes in habitat availability over time.
- 2) Page 22, line 787 – Statement valid for PPR nesting ducks, but NAWMP encompasses other species outside of PPR, some with declining population trends.
- 3) Page 22, line 791 – Threats to non-breeding habitats have not diminished since inception of NAWMP, even with aggressive habitat protection and restoration efforts. This sentence does not take into account those species (e.g. Black duck, sea ducks) that breed or winter outside of the Prairie Pothole Region (PPR).
- 4) Page 19, line 627 – Higher duck densities may not be supported on wintering coastal habitats threatened by development or disturbance, particularly in areas with high human populations that may limit survival during key wintering periods. Is data available to support this statement in the report?

- 5) Page 24, Line 856 – Should be noted that geographic prioritization is already built into the NAWCA process that gives added weight to projects in PPR.
- 6) Page 46, 3rd paragraph – The statement that intensive programs are less effective in non-wintering habitats like the CVJV or LMVJV is accurate, but in coastal habitats intensive programs are the most effective to provide permanent protection to wintering and foraging habitats under severe threats from development and degradation.
- 7) Page 60, # 7 – There is some evidence the coastal wintering habitat may be limiting for some species (e.g. black ducks, sea ducks) and that carrying capacity of coastal habitats has declined. This somewhat contradicts #9 that states other species outside of PPR deserve attention.
- 8) Page 75, Appendix E. - NAWMP Greater Snow Goose population objective in the 1994 NAWMP Update was 500,000. I believe this is still the current population objective and is stated such in the ACJV Waterfowl Implementation plan. Many goose population objectives have shifted from wintering ground-based estimates to breeding grounds. This should be the focus for all populations since estimates based upon wintering surveys do not account for environmental variation that can significantly affect goose distribution, particularly at regional scales. Goose populations may be more limited by wintering habitat, thus importance of conservation efforts in non-breeding habitats.

Again thank you for the opportunity to comment on the draft continental assessment. If you have any questions or need further clarification, please feel free to contact me at 717-776-7337 or email johdunn@state.pa.us.

Sincerely,

A handwritten signature in black ink that reads "John P. Dunn". The signature is written in a cursive, flowing style with a large initial "J".

John P. Dunn

Ec: David Cobb, Chair AFC
Bill Crenshaw, Chair AFCTS

TO: Seth Mott
Division of Bird Habitat Conservation
U.S. Fish and Wildlife Service
Department of the Interior
4401 N. Fairfax Drive, Suite 110
Arlington, VA 22203

FROM: Mark Vrtiska, Ph.D., Waterfowl Program Manager, Nebraska Game and Parks
Commission

RE: Review of NAWMP Assessment Report.

DATE: November 15, 2006

Overall, I thought the North American Waterfowl Management Plan (NAWMP, Plan) Assessment report was comprehensive, insightful, and well written. Recommendations within the report appeared to me to agree with findings and conclusions revealed by the Assessment Steering Committee. I believe the report will greatly assist the Plan Committee and the Plan Community in improving operations, habitat delivery, and ensuring the future of waterfowl populations. I especially liked the recognition and emphasis on public policy and its impact on waterfowl and wetland conservation. Indeed, this assessment was probably overdue, given 20 years have passed since the initiation of NAWMP. As the report states, I also agree such assessments should be conducted on a more regular basis.

Given that this was the first attempt at an assessment of NAWMP and there was limited funding and time to conduct such a relatively large undertaking, I am cognizant that not all facets could be explored or possibly to their fullest extent desired. Nonetheless, here are some considerations for the next assessment(s).

One possible criticism of this assessment may be that the Division of Bird Habitat Conservation (DBHC) led the assessment and a former Joint Venture (JV) employee served as the coordinator, and thus, the assessment was not completely unbiased. While I do not believe that this was the case, future assessments may want to incorporate some sort of independent assessment group or mechanism that would remove such criticism. Additionally, an outside perspective also may provide insights or thoughts about how business is conducted with NAWMP activities.

The assessment, while thorough, may not have been thorough enough. Obviously all JVs were provided questions and interviewed, but exactly who on the JVs (i.e., management boards and technical committees, or just management boards?). Also, who within the Flyway Councils and other Plan partners (no examples were given) were provided questions or interviewed? I think the assessment would have been more thorough and may be more open and honest if all levels of the JVs and Flyways and other Plan partners were allowed to provide input. Perhaps that was the case, but it was not clear in the assessment report how far or deep into the various input groups questions were provided. View and opinions of various questions could depend on if an

individual or group is at the technical level or management board level. Relatedly, were other groups (e.g., Ducks Unlimited) or agencies (e.g., Natural Resource Conservation Service) that are or may be involved in NAWMP activities consulted, or what about past management board or technical committee members? Some insights may have been gained talking with these individuals or groups.

There was some explanation on why the National Science Support Team (NSST) was probably not as effective as it could be, but there was no related explanation for the apparent lack of communication and leadership exhibited by the Plan Committee. Perhaps the same problem exists with the Plan Committee in that these individuals also have other jobs, and cannot devote their full attention to Plan activities? Without identification of the problem, solutions are difficult to find. Additionally, there was no mention of the staff available to NAWMP activities within the DBHC. Does DBHC have enough staff and resources to accomplish NAWMP goals and objectives? I think this was an important oversight in the report. Finally, I wholly agree with the recommendations regarding revitalizing and staff the NSST. It appears to me that for a number of recommendations by the report to bear fruit, the NSST need to be revitalized and staffed.

The list of recommendations is impressive and provides an excellent framework to improve Plan activities. However, it seemed from the report that there needs to be a priority list of sorts that recognizes that some recommendations need to be fulfilled before others can be accomplished. The assessment appears to dump a lot on the plate of the NSST, so getting the NSST staffed may rise in how recommendations prioritized to move things along at a more efficient pace.

While I agree and support the emphasis of JVs using adaptive management as a way of doing business, this is not the sole way for JVs to test assumptions and it seemed a bit over-emphasized. Adaptive management may be a very costly endeavor for most JVs, and technology for testing some assumptions on an annual or semi-annual basis is just not there. If JVs can accomplish this task, then yes, they need to, but if structure, resources, and technology are not there, JVs may need to look at more traditional methods of evaluation to look at their programs.

While I liked Appendix F (Characteristics of Effective JVs) and thought it would be helpful to all JVs, it might have been equally useful to – without identifying the JV – list or discuss ideas and methods that have not worked out. There obviously some things that have not worked and possibly some lessons learned that also should be shared among JVs so similar mistakes are not made in the future.

There was not a thorough appraisal in terms of manpower, time or resources of JVs delivering all-bird conservation on impacts on reaching NAWMP goals and objectives. I also think this is critical because there needs to be a gauge to understand the magnitude of manpower, time and resources needed to fulfill goals and objectives of NAWMP as well as all other bird conservation plans. Just as there needs to be a better system of habitat tracking, there needs to be one for allocation of resources.

Finally, with the merging of harvest management and habitat conservation, there was mention of a group to be charged with examining both ends of this spectrum. However, are there other strategies that could be employed to further bridge this gap? For example, the meeting of the

Central Flyway JVs and the Central Flyway Waterfowl Technical Committee at the recent North American Duck Symposium brought together the two groups. Should this be continued in other flyways? Are there other avenues to reconcile the two groups?

Again, my thanks and compliments on an excellent report. I appreciate the opportunity to provide comments, and I hope they are useful. Please let me know if you need any additional clarification or information concerning comments I have provided.

NAWMP Continental Progress Assessment

Peer Review Summary

ISSUE	THEMES	REVIEWER CITED
PPR bias	<p>NAWMP encompasses other species outside of PPR, some with declining population trends.</p> <p>Some coastal wintering habitats may be limiting for some species (e.g. black ducks, sea ducks) and carrying capacity of coastal habitats has declined. This contradicts recommendation #9 that other species outside of PPR deserve attention.</p> <p>PPR focus would lead to less funding directed toward species breeding in other regions, several of which remain far below population objectives (e.g., black ducks, scaup, and sea ducks).</p>	<p>J.P. Dunn</p> <p>W. Harvey</p>
Recognition for Nonbreeding JVs	<p>Threats to non-breeding habitats have not diminished since inception of NAWMP, even with aggressive habitat protection and restoration efforts. Need to account for those species (e.g. Black duck, sea ducks) that breed or winter outside of the PPR.</p> <p>Higher duck densities may not be supported on wintering coastal habitats threatened by development or disturbance, particularly in areas with high human populations that may limit survival during key wintering periods.</p> <p>In coastal habitats, intensive programs are the most effective to provide permanent protection to wintering and foraging habitats under severe threats from development and degradation.</p> <p>Great potential for degradation and outright loss of wintering habitat in eastern North America, much of it located in coastal areas near dense human populations - significant risk of loss or degradation.</p>	<p>J.P. Dunn</p> <p>W. Harvey</p>
Prioritize Recommendations	<p>Need a priority list that recognizes that some recommendations need to be fulfilled before others can be accomplished.</p> <p>Some direction on prioritization and timelines are needed here.</p> <p>Given the enormous workload laid out for the NSST, should one of the highest-priorities be to accomplish recommendation #21?</p>	<p>M. Vrtiska</p> <p>J. Gammonley</p>

	<p>If the need for Plan influence on extensive programs and policy issues is a top priority, more specific recommendations are needed on who should move these actions forward, benchmarks for progress, and timelines to direct and track these achievements.</p>	
Appendix F	<p>It might have been useful to anonymously discuss ideas and methods that have not worked out and lessons learned.</p>	M. Vrtiska
Tracking Accomplishments	<p>I suggest the report include a brief section that provides an example of the minimum information needed to evaluate the effectiveness of the Plan at a continental scale. This section might contrast 2 species, one for which we have a relatively large amount of information (e.g., mallard), and one that is relatively poorly understood (e.g., scaup or a sea duck). For each species, the section should list the important questions that need to be answered about the species and its habitat (along with the necessary precision), how the information would be used to direct future conservation actions, and recommendations for approaches for obtaining this information (and their costs).</p>	J. Gammonley
Tracking Net Change	<p>Biological models that describe landscapes needed to meet waterfowl needs in terms of habitat type and amount need to reflect actual conditions including “environmental variation” and need to account for changes in habitat availability over time.</p>	J.P. Dunn
Funding M&E	<p>Need increased focus on measuring progress. This has been a weakness in the past. If new funding is not forthcoming, I would support use of a small percentage of NAWCA funds for this purpose.</p> <p>Adaptive management may be a very costly endeavor for most JVs, and technology for testing some assumptions on an annual or semi-annual basis is just not there. If structure, resources, and technology are not there, JVs may need to look at more traditional methods of evaluation.</p> <p>NABCI monitoring report strongly recommends management-based bird monitoring programs, consistent with the recommendations for monitoring and adaptive management in relation to NAWMP, but how specifically can these tie-ins be strengthened, particularly in relation to securing the needed funding for effective Plan monitoring? The NABCI report seems to favor monitoring at the BCR level – how do we resolve potential conflicts with JV and continental-scale monitoring needs related to</p>	<p>W. Harvey</p> <p>M. Vrtiska</p> <p>J. Gammonley</p>

	NAWMP, or do we need to?	
NAWCA	Geographic prioritization already built into the NAWCA process that gives added weight to projects in PPR.	J.P. Dunn
Peer Review	<p>DBHC led the assessment and a former JV employee served as coordinator – increased potential for bias. Consider independent assessment group future assessments.</p> <p>Assessment would have been more thorough if all levels of the JVs and Flyways and other Plan partners were allowed to provide input.</p> <p>Independent perspectives on what makes a good program and what questions should be asked and answered might be helpful. Future assessments should include a wider range of Plan partners.</p>	M. Vrtiska J. Gammonley
NAWMP Emerging Issues	There is a need to identify and prioritize specific, emerging issues facing North American waterfowl that the Plan can address; Most urgently needed for the boreal forests and the Arctic where energy development and mining activities are increasing around key breeding areas, and in Mexico.	J. Gammonley
NABCI	There was not a thorough appraisal in terms of manpower, time or resources needed for JVs to deliver all-bird conservation and its impact on reaching NAWMP goals and objectives. Need a better system for allocation of resources.	M. Vrtiska
Unifying Waterfowl Mgmt.	In terms of merging harvest management and habitat conservation, are there other strategies for bridging this gap (e.g., meeting of Central Flyway JVs and Central Flyway Waterfowl Technical Committee at the 4th NADS). Should this be conducted in other flyways? Other avenues to reconcile the two groups?	M. Vrtiska
NSST	<p>There was some explanation on why the NSST was probably not as effective as it could be, but there was no related explanation for the apparent lack of communication and leadership exhibited by the Plan Committee.</p> <p>NSST need to be revitalized and staffed. Assessment dumps a lot on the plate of the NSST, so getting the NSST staffed may rise in how recommendations are prioritized.</p>	M. Vrtiska



Robert L. Ehrlich, Jr., *Governor*

Michael S. Steele, *Lt. Governor*

C. Ronald Franks, *Secretary*

December 27, 2006

Mr. Seth Mott
Chief, Branch of Science and Planning
Division of Bird Habitat Conservation
U.S. Fish and Wildlife Service
4401 N. Fairfax Drive, Stop 4075
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Dear Mr. Mott:

I appreciate the opportunity to review the North American Waterfowl Management Plan Continental Progress Assessment as requested by the Atlantic Flyway Technical Section. In general I found the report to be thorough and well written. It was obvious that a great deal of work and thought went into this draft. Following are my comments on the plan's Primary Conclusions and Recommendations:

1. Page 57, recommendation A-1: I wholeheartedly agree with the increased focus on measuring progress. This has clearly been a weakness of the plan in the past. Ideally new funds can be found to pay for these assessments. However, if new funding is not forthcoming, I would support use of a small percentage of NAWCA funds for this purpose.
2. Page 60, recommendation C-7: I generally agree that reproductive success and thus breeding habitat is probably more critical than wintering concerns. However, I think this recommendation is too general and needs to be revised to include additional considerations. For example, many waterfowl species wintering in eastern North America breed in eastern Canada where habitats are generally more stable and less influenced by humans than those in the Mid-Continent region. Wintering energetics may well play a more significant role in these populations (e.g., black ducks). The recommendation does not consider the potential for degradation and outright loss of habitat. Wintering habitat in eastern North America, much of it located in coastal areas near dense human populations, is at significant risk of loss or degradation. If these areas are lost, no federal program or landowner incentives can bring them back. In addition, shifting focus and funding to the Prairie Pothole Region may make sense from the perspective of continental duck numbers. However, this shift would lead to less funding directed toward species breeding in other regions, several of which remain far below population objectives (e.g., black ducks, scaup, and sea ducks).

Other comments:

Page 72, Appendix E. I understand that this table is in review. However, I question why mute swans are included at all.

Sincerely,

William Harvey
Game Bird Section Leader
Maryland DNR

Cc: Bill Crenshaw, Chair, Atlantic Flyway Technical Section