

January 23, 2002

Mr. Jon Andrew  
Chief, Division of Migratory Bird Management  
U.S. Fish and Wildlife Service  
4401 North Fairfax Drive, Suite 634  
Arlington, Virginia 22203

Dear Mr. Andrew:

The following are comments of the Central Flyway Council (Council) regarding: *Draft Environmental Impact Statement: Light Goose Management, September 2001*, published by the U. S. Fish and Wildlife Service (Service). The Council strongly supports efforts to reduce Central/Mississippi Flyway (CMF) light goose populations. We do not support any of the alternatives as written because they appear to be mutually exclusive. However, we do support implementation of Alternative B with modifications through 2005 as referenced in the *Arctic Ecosystems in Peril* report (Batt 1997). Additionally, if progress is not being made towards reducing CMF populations and habitat recovery, the EIS needs to allow alternatives C and D to be implemented in an additive fashion to Alternative B. The decision to implement strategies beyond Alternative B should be based on specific decision criteria. If it is not possible to modify Alternative B, a new preferred alternative should be written. We request the following changes.

Alternative B modifications should allow sandhill crane hunting during the Conservation Order. However, crane hunters would be prohibited from possessing electronic calling devices, unplugged shotguns, shooting after sunset and using any other means and methods that may become legal to promote additional light goose harvest. We anticipate that this would be used only in Texas and would allow continuation of crane hunting opportunity while still meeting our obligation to reduce light geese.

Alternative B should also stipulate for habitat manipulations similar to those currently allowed under dove hunting regulations for the taking of light geese when all other migratory birds seasons, except falconry, are closed. We anticipate that this would only be used in areas where crane hunting is closed. Unnecessary restrictions on habitat manipulation during the conservation order not only limits the take of light geese, but has a significant detrimental impact on management of other migrating and wintering waterfowl in some states. We strongly disagree with the statement "*that further modifications of baiting regulations for the sole purpose of light goose management will create unnecessary confusion and burden on the hunting public*". Applying such regulations during the conservation order will be no more confusing than allowing unplugged shotguns, electronic calls and extended shooting hours. The suggestion by the Service that "*to make agricultural foods available to birds other than light geese, crops could be manipulated in limited areas and be closed to light goose hunting so that a baiting situation does not arise,*" indicates a lack of understanding of migratory waterfowl behavior to hunting pressure and food availability. To make desired foods available to waterfowl by some manipulation, and then close the area to light goose hunting, almost guarantees that light geese will be pressured into the closed area and quickly consume the food, experience limited harvest,

and improve their body condition and nutrient reserves. Other species of ducks and geese that are not being hunted, may be slower to react to the available food, and be deprived of that food source and the associated energy and nutritional benefits. Some states in migration and wintering areas have “providing for the nutritional needs of waterfowl” stated as part of their waterfowl management objectives.

Decision criteria for implementing Alternatives C and D will require a specific date for review, as well as the measures or criteria that will be used to implement direct control actions. Administrative and implementation actions must be planned now in order that the more aggressive steps can be initiated in a timely manner should actions beyond Alternative B be justified. The decision to implement more aggressive actions should be made in coordination with states, provinces, Flyway Councils, the Canadian Wildlife Service and others. The criteria used to initiate measures in Alternatives C and D should include habitat trends, light goose population trends, and the effects of overabundant light geese on other species of wildlife.

Language in the EIS should be clarified to provide for implementation of actions to resolve geographic or site specific problems with light goose populations. Potentially, CMF populations may be reduced to overall goals, yet specific populations may remain above desired levels in certain areas of their range.

The Council believes that the Service should not evade their responsibility to control over abundant light geese by simply allowing states to “apply” for permits. If direct control on wintering and migration areas in the U. S. are required and implemented, we expect the Service to be the primary agency responsible for control efforts, with assistance from state agencies. CMF control permits, unless submitted by Service field staff, would not be necessary. The Council fully expects that the planning and actual control activities, along with record keeping and monitoring efforts, would be handled and coordinated by Service personnel with assistance from state personnel.

We are concerned about implications in the EIS regarding impacts to other species. We believe the Service must be prepared to justify impacts on non-target species when direct control management actions are implemented. It is clear that overabundant light geese may result in the loss of significant numbers of migratory birds and other wildlife due to such things as disease or extensive habitat destruction in the arctic and/or subarctic. While we certainly do not encourage strategies that cause extensive collateral damage, in actual operation some losses may be unavoidable. For example, major cholera outbreaks caused by light geese could kill thousands of other migratory birds. Thus, it may be in the best long-term interests of all wildlife populations to allow management strategies to occur that could have potential negative impacts to some species but efficiently and quickly reduces light goose numbers. However, we do agree and support actions identified in the EIS concerning impacts to special status species. Finally, the Council believes the Service should begin steps to amend the migratory bird treaty to eliminate the obstacles that prevent the timely implementation of management practices necessary to ensure the healthy future of not only light geese, but all waterfowl species. Increasing numbers of some populations of Canada geese raises the possibility that special management actions also will be required to ensure their long-term future. Hopefully, we can learn from past experiences with light geese, and be better prepared to address these management

challenges in a timely and efficient manner.

Thank you for the opportunity to comment.