

Jon Andrew, Chief
Division of Migratory Bird Management
U.S. Fish and Wildlife Service
Department of Interior
ms 634 - ARLSQ
1849 C Street NW
Washington DC 20240

29 May 2002

RE: Draft Environmental Impact Statement on Resident Canada Geese

Dear Mr. Andrew,

The following constitutes the official comments of the Central Flyway Council about the Draft Environmental Impact Statement (DEIS) on Resident Canada Goose Management published in February 2002. Editorial comments have been separated from those of a more substantive nature contained in this letter.

We found the document comprehensive, well written and thorough. We are hopeful that the Final EIS will provide the mechanisms to effectively address the problems associated with resident Canada geese in the Central Flyway. Our comments are based on the Goal and associated Objectives and Strategies in our approved plan entitled *Large Canada Geese in the Central Flyway: Management of Depredation, Nuisance and Human Health and Safety Issues*. The Goal in that Plan is to: Manage resident Canada geese in the Central Flyway to achieve maximum benefits from these birds while minimizing conflicts between geese and humans. In addition, our comments are based on the Flyway's input provided during the Scoping sessions you held during the preparation of the DEIS.

We largely agree with your assessment of the seven alternatives presented and therefore agree with the selection of Alternative F as the preferred alternative. Further, we reject selection of the other alternatives. That said, we request several modifications regarding the details of Alternative F.

We believe reference to the Western Prairie Population (WPP) of Canada geese should not be included in the DEIS as resident geese. This population of birds nests exclusively in Canada and is not technically included in your appropriate definition of resident birds. In fact, you make note of this on P III-23. The primary references to the WPP that should be deleted occur on Page I-6 and in Table I-7 on Page I-25. Reference to the WPP elsewhere in Chapter III appear valid.

We believe it is necessary to define the term "population of Canada geese" beyond references to, for example, the Great Plains Population. Within many states, a number of flocks can be defined, mostly based on their distribution at different times of the year. Some of these flocks comprise little of the overall population of geese yet are the source of many of the problems attributed to Canada geese. It is likely that states will or have identified flocks that should be reduced using a "public wildlife acceptance capacity" philosophy (P III-73: DEIS). It is possible that a zero-tolerance approach might be taken for flocks near airports and other specific situations. Actions associated with these situations may need to be taken without regard to a state's or the Flyway's overall population objective.

We suggest that states be able to define flocks of Canada geese based on a wide variety of criteria such as distribution, harvest distribution, productivity, harvest and survival rates or the likelihood of a flock to cause damage or otherwise harm or

threaten a human environment. We suggest that this change be made in general throughout the document, not just as it relates to Alternative F.

Using this kind of definition would assist the Service in its assessment of the use of the Conservation Order (CO) since a "serious threat" can exist at a particular place even when the overall population is stabilized or reduced. Also regarding the CO, we suggest the deletion of the phrase "and/or regular-season changes" on Pages II-13 and IV-40. We suggest that regular season changes are adequately reviewed during the usual annual regulation process.

The Central Flyway acknowledged the importance and value of conducting breeding goose surveys in a standard manner under Objective 4 of its Management Plan. However, requiring a state to conduct a statewide survey (which is the implication in the DEIS) when management actions may only be applied in a portion of the state needs to be removed from the DEIS. In addition, we believe there is not a need for unbiased, highly precise population estimates. The DEIS should make clear that surveys that provide population indices that are comparable over time are adequate to determine "population status and provide for the long-term conservation of the resource."

Further, in many cases, flocks occur in metropolitan areas, parks and golf courses where hunting is not permitted and we believe that these flocks should be able to be managed without any survey requirement at all. We also suggest that a state be able to remove some maximum number of nests, eggs or birds annually outside of metropolitan areas without a survey requirement. This is more than reasonable for populations measured in the tens of thousands.

Without these or similar approaches to statewide survey requirement, survey precision and minimum flock size, we find the breeding population survey requirement in the DEIS unacceptable.

We suggest that the DEIS identifies too great of an effect from "aggressive hazing", particularly as it relates to agricultural crops. This can be addressed in several ways including adding the phrase "including aggressive hazing which has largely been proven ineffective" to the next to last sentence in paragraph (2) on page IV-7. There are similar instances in Chapter V that should be changed in this regard.

We do not believe the requirement to complete a non-lethal goose harassment plan before implementing population control actions is necessary and we found no justification for same in the DEIS. Harassment may or may not be an action used to modify goose behavior or alleviate damage and is currently allowed without a permit. Given that the DEIS identifies the importance of increasing adult mortality to effectively reduce population size, we see no reason for this requirement. We recommend this ineffective, costly and unnecessary requirement be deleted from the Final EIS for all alternatives in which it is now included.

We strongly suggest that the term "Animal Rights" be deleted from the DEIS. The implication of the use of these words in the context of the DEIS is inappropriate and not in accord with our view of the natural world. There may be animal welfare and/or humaneness issues and in fact the discussion on page III-75 is more in these latter terms. Should you find it necessary to discuss the effects of particular alternatives or actions on a specific group of people such as those who advocate animal rights, we suggest you also include effects on other groups of people such as hunters, non-

hunters, wildlife conservation organization members or professional wildlife manager organizations.

We appreciate the effort the Service has put into the DEIS and the opportunity to provide our comments. We support Alternative F but strongly believe the modifications suggested above are critical to states in the Central Flyway to be able to efficiently and effectively address potential problems with resident Canada geese.

Sincerely,

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Central Flyway Council

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cc (Letter only) Central Flyway Council
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Attachment: Editorial Comments