
PACIFIC FLYWAY COUNCIL

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December 7, 2016

Jerome Ford
Assistant Director, Migratory Birds
U.S. Fish and Wildlife Service
Main Interior Building
1849 C Street, NW
Washington, DC 20240

Dear Jerome,

The Pacific Flyway Council (Council) requests the U.S. Fish and Wildlife Service (Service) begin work to revise the existing National Environmental Policy Act (NEPA) documents for light goose management to allow for a conservation order for light geese within the Pacific Flyway. We understand there may be issues that require consultation or scoping before embarking on the revision and offer our immediate assistance. The NEPA revision should give consideration to all three light goose populations within the Pacific Flyway - Ross's geese, Western Arctic Population lesser snow geese, and Wrangel Island Population lesser snow geese; injury to habitat, agricultural interests, and other species on breeding, staging, or wintering areas; and the possibility of taking preemptive action to avoid injury.

Federal regulations currently allow for a conservation order within the Pacific Flyway; however, the mechanism for authorization is confined to only consider habitat degradation on spring breeding grounds of the Western Arctic Population of lesser snow geese. Specifically:

“The Director may authorize a conservation order for the reduction of light geese . . . within the Pacific Flyway . . . when the Director determines that light goose numbers in the western Arctic have exceeded the ability of their breeding habitat to support them.”

These regulations and the current 2007 Environmental Impact Statement for light goose management do not provide adequate consideration of several other important factors. These include: other burgeoning populations of light geese and injury to other species, agricultural interests, and habitats on wintering, staging, and breeding areas outside of the western Arctic. For example, the Wrangel Island Population of lesser snow geese has now increased to two times Council's objective, habitat damage has occurred on staging habitats, and there is little opportunity to exclude specific populations of light geese from possible harvest during a hunting season or conservation order in the Pacific Flyway. Consequently, Council requests a more detailed analysis of the light goose populations in the Pacific Flyway.

Western Arctic Population lesser snow geese are already well above the spring population objective of 200,000 birds (North American Waterfowl Management Plan 2012). Photographic surveys of the nesting colonies in the Northwest Territories indicate the number of nesting birds has grown from about 171,000 adults in 1976 to about 500,000 adults in recent years (Kerbes et al. 1999; Hines et al. 2010; Canadian Wildlife Service, unpubl. data). Furthermore, data from the North Slope of Alaska suggests this portion of the Western Arctic Population now numbers approximately 26,000 and is growing rapidly; 38% per year since 1986 (USFWS 2016). Population modeling efforts suggest the growth of this colony is, in part, a result of immigration from other breeding colonies, likely from further east (US Geological Survey, unpubl. data). Additionally, Wrangel Island Population lesser snow geese are above the spring population objective of 120,000 birds (page 1; PFC 2006). The 2016 breeding estimate is approximately 300,000 birds, and the population has increased 8% annually since 2007 (USFWS 2016). This increase may also be attributed to immigration – a sevenfold increase in the number of blue-phase geese has been observed in recent years (V. Baranyuk, pers. communication). Prior to 2015, blue geese were very rare on Wrangel Island and it was assumed this population was relatively isolated from other populations.

The continental population objective for Ross's geese has been 100,000 birds since the inception of the North American Waterfowl Management Plan in 1986. By the mid-2000s, Ross's geese had expanded their range eastward on both nesting and wintering areas (Alisauskas et al. 2006), and the continental population was estimated at 1.5–2.5 million adult birds (Alisauskas et al. 2009; 2011, 2012), despite efforts to stop the growth of the population through increased conservation order harvest by hunters in the midcontinent region.

Light geese wintering in the Pacific Flyway are indexed by surveys in California and the Skagit/Fraser area in Washington and British Columbia during winter. The last comprehensive winter surveys were conducted during December 2014 when 1,142,000 geese were indexed, mostly in California. Light goose indices in the Pacific Flyway have increased 5% per year during 2005–2014 ($P = 0.018$; USFWS 2016).

Light geese in the Pacific Flyway are showing a pattern of continued population growth similar to that previously observed in other light goose populations in North America. As a result, Council believes it is time to implement a conservation order, before these populations reach a level that cannot be controlled through increased harvest by hunters. Based on experience with greater snow geese in the Atlantic Flyway, where increased harvest is associated with population stabilization, it may still be possible to stabilize Pacific Flyway light goose populations if harvest is liberalized.

Band return data suggest adult Western Arctic Population lesser snow geese have an annual survival rate of 85%, and Ross's geese have exceeded an annual survival rate of 90% in recent years (Canadian Wildlife Service, unpubl. data). Furthermore, harvest rates of these light geese are only 2–3% (Canadian Wildlife Service, unpubl. data); these rates are very low and are similar to estimates of other light goose populations. Additionally, band recoveries from the last 30 years suggest the winter distribution of Western Arctic Population lesser snow geese have shifted eastward and the population is increasingly mixing with Midcontinent Population light geese. In the 2000s, 81% of band

recoveries occurred in the Pacific Flyway, while the remainder were recovered in the Central and Mississippi flyways (Wood et al. 2011). Interestingly, these rates have been attained during a time period when both Ross's geese, and those Western Arctic Population lesser snow geese that winter in the Western Central Flyway, have been exposed to conservation order seasons.

Council believes light goose harvest in the Pacific Flyway is currently maximized under current framework limitations, and would like flexibility to apply additional hunting pressure on light goose populations. States have been contacted by numerous landowners and hunters about creating harvest opportunity when the birds are most prevalent on the landscape, which generally falls after March 10 in regions used as migration stopovers (e.g., eastern Oregon and southern Idaho).

Some localized habitat damage has been documented on Banks Island from the foraging activities of Western Arctic Population lesser snow geese; negative impacts to habitat and other species are predicted to expand if this population continues to expand (Hines et al. 2010). Council believes it would be a mistake to wait until "light goose numbers in the western Arctic have exceeded the ability of their breeding habitat to support them," before implementing a conservation order. At that point, it will likely be too late to halt population growth, and other species (e.g., Pacific black brant, pectoral sandpipers), could be negatively impacted by increasing numbers of light geese in the western Arctic.

Agricultural crop damage is another undesirable consequence of growing light goose populations. Increasing crop damage has been reported to the US Department of Agriculture-Wildlife Services in California, Idaho, and Oregon. Since 2010, there have been 15 different work tasks in five counties across southern Idaho. Crop damage has been confirmed on grain and alfalfa crops. In southeast Oregon, landowner complaints of damage to alfalfa, hay, pasture, and grain crops by spring migrant lesser snow, Ross's and white-fronted geese are common in the Klamath, Harney, and Snake River basins. Currently in the Klamath, 20+ landowners have been issued Migratory Bird Depredation Permits from the Service's Region 1 Permit Office, allowing them to kill depredating light and white-fronted geese after hunting seasons close on March 10. However, per terms of these permits, the geese may not be utilized for human consumption. Council believes a conservation order could lessen the need for these permits and allow hunters to help landowners experiencing damage by disturbing geese from areas where they are causing damage.

Council understands the Russian Federation has concerns about potentially reducing the size of Russian-breeding Wrangel Island snow geese, and understands they are interested in growing this population further. However, the Pacific Flyway has long held an objective of 120,000 geese for this population. Provided the most recent estimate is 300,000 geese and growing at a rapid rate, this population can likely sustain additional harvest pressure.

Council is doubtful continued growth of the Wrangel Island Population to 600,000 birds will in fact result in the stated goal of the Russian Federation to reestablish a wintering population in Japan. Council believes other options should be explored that might assist in reaching the stated objective versus additional protections within the Pacific Flyway. Based on what we currently know, an increasing Wrangel Island Population will only result in more snow geese wintering in the Pacific Flyway. We strongly encourage the Service to advocate for the Pacific Flyway position on

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maintaining the existing population versus allowing the population to double. However, Council is sensitive to negotiations with the Russian Federation and is willing to consider conservation order limitations in areas known to be occupied primarily by Wrangel Island Population lesser snow geese while maintaining harvest of other light geese.

The Pacific Flyway Council firmly believes growing light goose populations are a significant management concern, and would like to address this issue proactively, rather than reactively. The metric used to trigger a conservation order should become population based and tied to the Pacific Flyway management goal. Council is committed to assisting partners with ongoing efforts to obtain accurate information on population size, population trajectory, and harvest estimates for light geese in the Pacific Flyway. We ask that you accept our request to begin the NEPA process necessary to develop a conservation order that will cover all light geese within the Pacific Flyway. To accomplish this, we request you designate appropriate staff to work with representatives from the Pacific Flyway Council to develop a systematic pathway forward that leads to a conservation order for light geese in the Pacific Flyway with consideration of our expressed concerns. We appreciate the difficulties in managing these populations to achieve all our objectives and look forward to our continued cooperation in working together to address this very important issue.

Sincerely,

A handwritten signature in dark ink that reads "Jeff Gould". The signature is written in a cursive style with a large, prominent "J" and "G".

Jeff Gould, Chair
Pacific Flyway Council

JG:JK:clc
cc: Pacific Flyway Council Members
Brad Bortner
Todd Sanders
Josh Dooley

References:

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