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Robert Blohm, Chief  
Division of Migratory Bird Management  
U. S. Fish & Wildlife Service  
Arlington Square MS MBSP 4107  
4401 N. Fairfax Drive  
Arlington VA 22203 USA

Dear Mr. Blohm:

I am writing on behalf of the Wisconsin Conservation Congress. Formed by State Statute, we are an advisory body to the Natural Resources Board, which is the policy board of the Department of Natural Resources. Wisconsin state statute 15.348 indicates that the Conservation Congress shall be an independent organization of citizens of the state and shall serve in an advisory capacity to the Natural Resources Board on all matters under the jurisdiction of the Board. The purpose is to represent the citizens of Wisconsin by working with the Natural Resources Board and the Department of Natural Resources to effectively manage Wisconsin's abundant natural resources for present and future generations to enjoy.

The Wisconsin Conservation Congress consists of 5 delegates from each of the 72 counties in Wisconsin elected by the public to represent the citizens of Wisconsin in hunting, fishing and trapping matters as well as environmental issues. That's 360 delegates who, by law, serve as the voice of the public to the Wisconsin DNR and the Natural Resources Board.

The Wisconsin Conservation Congress Migratory Committee, comprised of 27 members from throughout the state that represent Wisconsin's 80,000 waterfowl hunters and waterfowl resources, accepted the 2008 federal duck season framework for the Mississippi Flyway. However, we have significant concern with three specific season framework decisions that have been mandated by the USFWS and would like to express these concerns to you as detailed in this letter.

The three areas of concern are: 1) the complete closure of the 2008 Canvasback season, 2) the reduction in harvest limits on Scaup; and 3) the change to allow the Pacific Flyway to use Alaskan bird counts in the calculation of their season framework and the removal of these bird counts from the mid-continent calculation.

Canvasbacks: We do not see any evidence that supports the closure of the harvest of Canvasbacks for the 2008 season. The reported decrease in the Canvasback breeding population for 2008 does not seem biologically possible unless there was a massive winter kill off that has not been reported. We believe the lower number of Canvasbacks counted this spring is most likely due to an over-flight of the traditional breeding areas due to dry conditions in the prairies. The Mississippi Flyway Council put forth a proposal to the USFWS that would allow for a 60 day season and a 1 bird per day limit if the Canvasback population fell between 400,000 and 800,000 birds. Below 400,000 birds would be a closed season and above 800,000 birds would allow for a 2 bird daily limit. This proposed framework can be supported based on the Redhead harvest data and population data which when overlaid with data on Canvasbacks appears to track each other very closely. We have had 60 day seasons and 2 birds per day limits on Redheads with no impact to the long-term population trends of this species. This proposal by the Mississippi Flyway Council would provide a more consistent and sound approach to the season framework for Canvasbacks. We ask that the USFWS reconsider their position of Canvasback season closure for 2008 and instead institute a 60 day season with a daily bag limit of 1 bird.

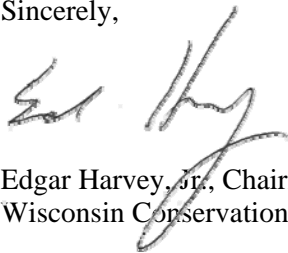
Scaups: We do not see any evidence that supports another reduction in the harvest of Scaup during the 2008 season. We understand that the USFWS agreed to a compromise with the Flyway councils that allows for 40 days with one bird in the bag and 20 days with 2 birds in the bag. However, given that Scaup are the 3<sup>rd</sup> most abundant bird in North America and the population decline has flattened we believe that a 60 day season with a 2 bird daily bag limit would be effective in protecting the resource. This switch in bag limits will likely cause confusion with some hunters. There is a 6-duck bag limit on Ring Necks (Ring Bills) which look similar to Scaup as does the female Red Head. Wisconsin also has a fair amount of big water hunters. A one duck bag on Scaup isn't worth the time and money spent to set up for the hunt. This most likely will affect duck stamp sales and the revenue that the USFWS and state wildlife agencies receive to run waterfowl and habitat programs next year. The 20 days of two Scaup will be different in Wisconsin because we have two different duck openers and a split of five days in the south zone and running eleven days later than the north zone which opens one week earlier than the south zone. We feel this will be a law enforcement problem. Again, we support and believe a 60 day season and a 2 bird daily bag limit would be effective in protecting the resource and offer the hunting community reasonable harvest expectations.

Pacific Flyway Counts: We are very concerned with the changes to the mid-continent Mallard count where the Alaskan breeding surveys have been removed and will be used by the Pacific Flyway to set their season framework. This has the potential to reduce or close Mallard harvests in the Central and Mississippi Flyways while at the same time we would still have liberal seasons in the Pacific Flyway. It is our understanding based on harvest data from bandings that a large portion of the Pacific Flyways Mallard harvest comes from the prairie pothole region. So, it does not appear that this is fair to hunters in the Central and Mississippi Flyways nor does it appear to be a sound solution to protecting the Mallard resource when it may need protection. We ask that the USFWS return to the historical method of mid-continent Mallard count to insure a fair harvest across all of the flyways and to provide adequate protection to the Mallard resource when it is needed.

The Wisconsin Conservation Congress and the Migratory Committee of the Congress are not opposed to season closures or limited bag limits when there is solid biological evidence and solid quantitative data that indicates the resource is in need of additional protection.

We know you will most likely be unable to change the 2008 season frameworks that have been set forth, but please consider our comments and changes when setting the 2009 season framework. We thank you for taking time to read and understand our concerns with the closure of the Canvasback season, reduce bag limits on Scaup and the Pacific Flyway/Mid-Continent Mallard count that has the potential to impact season frameworks in the future.

Sincerely,



Edgar Harvey, Jr., Chairman  
Wisconsin Conservation Congress



Richard Koerner, Chairman  
Migratory Waterfowl Committee  
Wisconsin Conservation Congress

CC: Kent Van Horn, DNR  
George Meyer, Wisconsin Wildlife Federation  
Dale Arenz, Wisconsin Waterfowl Association  
Tom Zwicker, Ducks Unlimited  
Natural Resources Board members  
WCC Migratory Committee