improvement and applauded the adoption of AHM for the 1995-96 season. They are concerned, however, that management strategies for North American duck populations would be implemented without species-specific population information. In particular, they are concerned about how and when the AHM process will be implemented for species other than mallards.

The California Waterfowl Association commended the Service for moving forward with AHM. They did express concern, however, for the potential of a season closure in California, the AHM terminology regarding regulations packages, and the use of only midcontinent mallards and prairie-habitat conditions in the AHM process.

Individuals from Mississippi, Oklahoma, Arkansas, and Tennessee expressed support for the AHM process and the Service's proposed regulatory packages. However, one individual from Arkansas stated that future AHM criteria should be adjusted to be more conservative. Another individual from New York expressed dissatisfaction and strong concern over the AHM regulatory packages citing the North American Waterfowl Management Plan goal of 100 million birds in the fall flight, the use of mid-continent population data, the appearance of moving too far too fast, and the increased crippling rate associated with higher bag limits. An individual from Illinois expressed concern that the proposed liberalizations in duck hunting regulations were not consistent with the goal of 100 million ducks in the fall flight.

Service Response: The Service appreciates the broad support expressed for the concept of AHM, which is designed to increase objectivity and efficiency in the setting of waterfowl hunting regulations. Often in the past, the regulations-setting process was characterized by a lack of agreement among managers on the best approach to regulating harvest. The Service believes that this lack of agreement was because: (1) harvest-management objectives were not always clearly stated or agreed upon; (2) a large number of regulatory options hindered assessment of their effects; and (3) there was disagreement among technical experts on the degree to which hunting affects duck populations. AHM improves upon the current approach using clearly defined harvest-management objectives, a limited set of regulatory options, and new data-assessment procedures to resolve disagreement about the effects of hunting.

The decision criteria for the 1995-96 hunting season were based on the status

of mid-continent mallards and their breeding habitat, the mallard population goal of the North American Waterfowl Management Plan (i.e., 8.1 million mallards in the surveyed area), and 4 potential regulatory options (i.e., closed, restrictive, moderate, and liberal). The harvest "prescriptions" call for liberal duck-hunting regulations if the mallard population is high (relative to the Plan goal), breeding-habitat conditions are exceptionally good, or both. Restrictive regulations or a closed season would be needed when population status and habitat conditions are relatively poor. Moderate regulations would be appropriate under intermediate population levels and pond numbers. This year's estimates of 8.3 million mallards and 3.9 million ponds in Prairie Canada allow for the liberal option, which contains season lengths and bag limits similar to those last used during 1980-84. After information is available from population surveys next spring, managers will evaluate what they have learned about the effects of hunting. That information will then influence the harvest prescriptions next year. This annual process of feedback is repeated year after year, ensuring that managers improve their understanding of the effects of regulations on waterfowl populations and make adjustments to harvest strategies accordingly.

The Service recognizes that 1995 represents a transition year with respect to implementation of AHM and that further refinement is needed. In particular, the set of potential regulatory options will be reviewed and necessary adjustments made based on the following criteria: (1) options should differ sufficiently so that differences in harvest levels and their impacts on duck populations can be detected with current monitoring programs; (2) the set of options should produce enough variation in harvest rates to permit identification of optimal harvest strategies; and (3) regulatory options should reflect the needs of law enforcement and the desires and abilities of hunters. The set of options can be reduced or expanded as the need arises, but it is important to use the same options long enough to identify patterns in harvest rates under each regulatory option.

With respect to the North American Waterfowl Management Plan (Plan), the Service appreciates support for linking the objectives of harvest management with the population goals of the Plan. The Service recognizes, however, that further consideration is needed regarding how much emphasis to place on hunting opportunity when

populations are below Plan goals and how to best incorporate goals for species other than mallards. There appears to be a misunderstanding about Plan goals. The 100 million fall flight includes areas in Canada and the USA that lie outside the annual survey area. If estimated duck abundance in unsurveyed areas is included, the continental fall flight of ducks this year should be well over 100 million.

The Service recognizes the limitations imposed by relying solely on the status of mid-continent mallards for setting basic season lengths and bag limits. It is important to note, however, that duck regulations always have been based primarily on the status of mid-continent mallards. This is because they are the most abundant duck in the harvest and because mallards are good indicators of how many other species are doing. For this year, the Service continues to make special provisions within the basic frameworks for some species (e.g., pintails, black ducks, canvasbacks, wood ducks). During the next year, the Service, in cooperation with the Flyway Councils and others, intends to develop a conceptual framework and timetable for expanding AHM to other populations of mallards and to other duck species.

The Service also recognizes that its prescription for closed seasons under some combinations of population and pond numbers is a source of concern. By law, however, the Service is mandated to consider closed seasons (in fact, seasons remain closed unless action is taken to open them). For the purpose of the 1995 regulations, only four options (closed, restrictive, moderate, and liberal) were considered in the assessment, with the recognition that closed or even restrictive seasons likely would not be needed this year. Even if resource conditions deteriorated dramatically, a closed season would not necessarily be needed; the Service would first determine if more restrictive regulations than those in the proposed restrictive option would be compatible with resource status.

Though substantial progress has been made in communicating AHM to the professional community, many conservation groups and the public-atlarge remain uninformed about the approach. Because AHM represents a significant change in the approach to setting regulations, it is important that this change be communicated to the public in a timely fashion. Outreach efforts now are ongoing through the Service Public Affairs Office, and State conservation agencies continue to play an important role in educating nongovernmental organizations and the