the Flyway Councils asked the Service to review this policy. The Service's review was completed in July 1994 and sent to all Flyway Councils. The 1990 review indicated that (1) there was little evidence that the point system was more effective than the conventional bag limit at redirecting harvest, (2) major problems remained with determining appropriate species- and sex-specific point values, (3) species closures eliminated the bird-in-hand identification advantage of the point system, (4) reordering of point values in the field was an incentive under the point system and enforceability remained a major concern, and (5) most problems with the point system were in application and not concept.

In the 1994 review, the Service considered additional information that had been gathered since the 1990 review, and concluded that the point-system alternative to the conventional bag limit should be discontinued. Over the years, the Flyway Councils and States have had substantial opportunity to provide input into the review of scientific studies and analysis of this information. The completion of the 1990 and 1994 reviews and the decision to discontinue the point system have considered input from all entities.

Regarding the recommendations for shorter seasons and smaller bag limits, the Service has reviewed the current status of populations and evaluated the potential impacts of the proposed frameworks. The Service believes that the frameworks provided herein are consistent with the improved status of ducks and long-term population goals.

## D. Zones and Split Seasons

Written Comments: The Central Flyway Council and the Nebraska Game and Parks Commission recommended that the Service eliminate its policy that States may not zone and/or use a 3-way split season simultaneously within a special management unit and the remainder of the State when establishing duck hunting zones.

An individual from Virginia requested a continuous season with no splits, while the Humane Society urged the Service to discontinue all split and special seasons and recommended that any State establishing such seasons reduce the total number of hunting days by a minimum of 10 days.

Service Response: The Service will continue to utilize the guidelines that were established for the use of duck zone/split seasons published in the September 21, 1990, Federal Register (55 FR 38898). These guidelines contain specific limitations on special management units, including the High

Plains Mallard Management Unit in Nebraska. The original justification and objectives established for the High Plains Mallard Management Unit provided for additional days of hunting opportunity at the end of the regular duck season. In order to maintain the integrity of the management unit, current guidelines prohibit simultaneous zoning and/or 3-way split seasons within a management unit and the remainder of the State. Removal of this limitation would allow additional proliferation of zone/split configurations and compromise the original objectives of the management

In regard to the recommendation that split and special seasons be discontinued, the Service notes that States always have the option of selecting a continuous season with no splits. Furthermore, the Service is not aware of any information that split seasons are causing detrimental impacts to populations.

The Service also reminds the Central Flyway Council that the report on the High Plains Mallard Management Unit should be completed. The Service did not receive the report by the Central Flyway Council's target completion date of June 1995 and requests additional information as to its status, including an updated target completion date.

# G. Special Seasons/Species Management

## i. Canvasbacks

Written Comments: An individual from Wisconsin supported the proposed opening of the canvasback season.

Service Response: Results of the May Breeding Waterfowl and Habitat Survey this year indicate that habitat conditions and the size of the canvasback population are sufficient to open the season on canvasbacks. Therefore, the Service is offering a bag limit of 1 canvasback per day during the 1995-96 regular duck season.

#### ii. Redheads

Council Recommendations: The Mississippi Flyway Council recommended a bag limit of 2 redheads per day, an increase from the bag limit of 1 redhead per day proposed by the Service.

Public-Hearing Comments: Mr. Richard Elden stated that, based on the status of redheads this year, liberalization of the daily bag limit for this species was warranted and biologically supported, and requested that the Service reconsider its proposal and increase the number of redheads in the daily bag limit from 1 to 2 birds in the Mississippi Flyway.

Dr. Rollin Sparrowe questioned why the Service did not consider adding an additional redhead to the bag limit in the Mississippi and Central Flyways when populations seemed appropriate and urged the Service to reexamine this aspect before frameworks were finalized.

Written Comments: The Texas Parks and Wildlife Department, in letters dated June 6 and September 6, 1995, requested a bag limit of 2 redheads per day in the Central Flyway. They believe that a daily bag limit of 2 redheads per day should have been part of both the moderate and liberal packages for the 1995-96 hunting season based on the recent increases in the breeding population. Further, they state that the current population and harvest data substantiate the biological justification for a daily bag limit of 2 redheads in both the Central and Mississippi Flyways.

Service Response: The Service prefers that proposals for changes in species- or population-specific regulations be based on more long-term strategies rather than in response to short-term changes in population estimates. The Service believes that such strategies should include the following: (1) an assessment of how the population responds to harvest and environmental conditions, (2) criteria that prescribe when regulations should be changed (i.e., become more restrictive or more liberal), (3) the range of regulatory options that will be considered (e.g., ranges of season lengths and bag limits), and (4) considerations for determining the efficacy of the harvest strategy. The proposals to permit a bag limit of 2 redheads per day were received in late July, and were based primarily in response to the estimated size of the redhead population during spring 1995. Due to the timing of the requests, analyses of biological data sufficient to address the four criteria above could not be conducted. Further, additional harvest opportunities on redheads in all Flyways will result from increases in season lengths proposed for this year. The Service recommends that MBMO and the Flyways cooperatively develop protocols and strategies for addressing species- and population-specific limits within the context of the AHM Initiative, and believes the AHM Working Group is the appropriate forum for this endeavor.

### 4. Canada Geese

#### B. Regular Seasons

Council Recommendations: The Atlantic Flyway Council recommended that the regular season on the Atlantic