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Alaska Board of Game
PO Box 115526
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February 28, 2023

Re: BOG Southcentral Region Meeting

Oppose Proposal 163 which seeks to “Rescind the bag limit restrictions for sea duck hunting in Unit 15C.”

I oppose this proposal because it is based on an outdated understanding of sea duck populations in Kachemak Bay, and it is not a sustainable approach to local waterfowl management. To be sustainable harvest regulations need to be based on what wildlife populations are now, regardless of reasons for change, not how they use to be decades ago.

An example of misunderstanding is the statement in the proposal that says, “There is no documented biological problem indicating low population levels or substantial declines for eiders, harlequin ducks or long-tailed ducks (nor for buffleheads or goldeneyes that are the subject of current discussion by local supporters of restrictions).”

This statement clearly ignores many recent scientific studies that have warned of recent avian population declines in North America, including sea ducks. For example, national attention has been given to a massive study published in *Science* in 2019 entitled *Decline of North American Avifauna* by Rosenberg et al. The study concludes, “Cumulative loss of nearly three billion birds since 1970, across most North American biomes, signals a pervasive and ongoing avifaunal crisis.”

A more recent study building on that is *State of the Birds 2022* which has information specific to sea ducks. Below is information copied from that report.

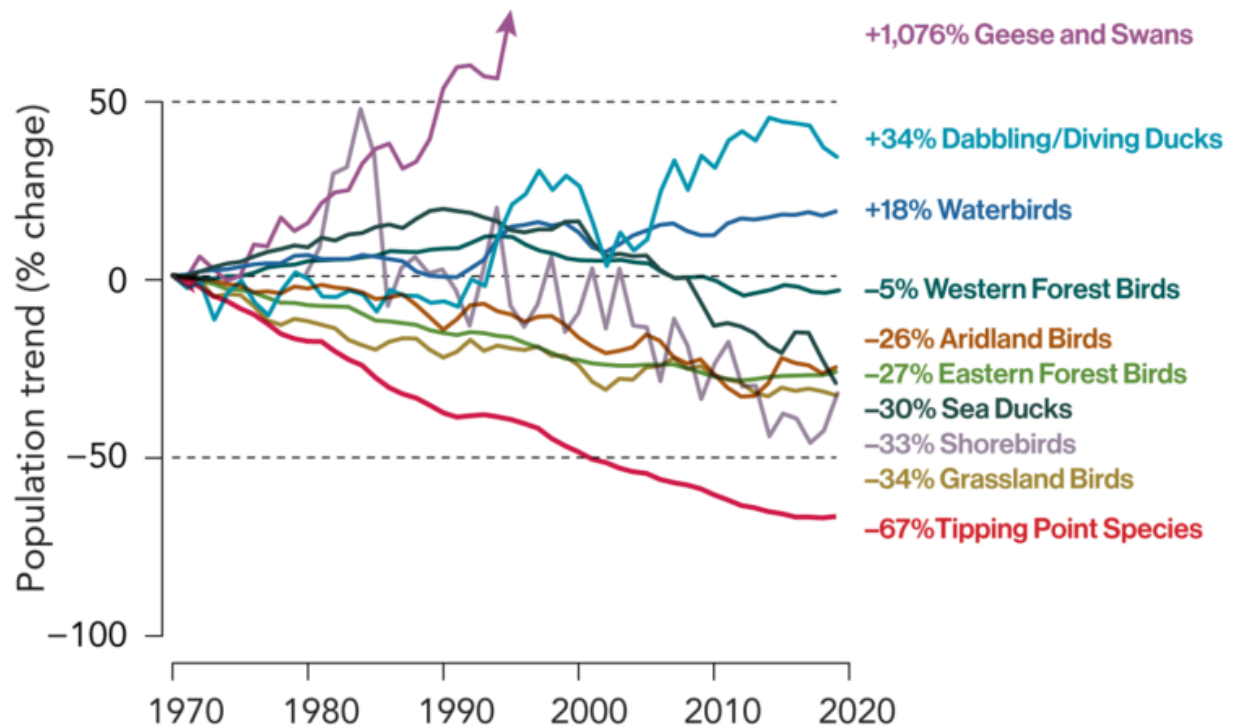
State of the Birds 2022
State of the Birds Report Reveals Widespread Losses of Birds in All Habitats—
Except for One

Published by 33 leading science and conservation organizations [including Ducks Unlimited] and agencies.

The United States and Canada have lost 3 billion breeding birds since 1970—a loss of 1 in 4 birds, according to research published in *Science* in 2019.

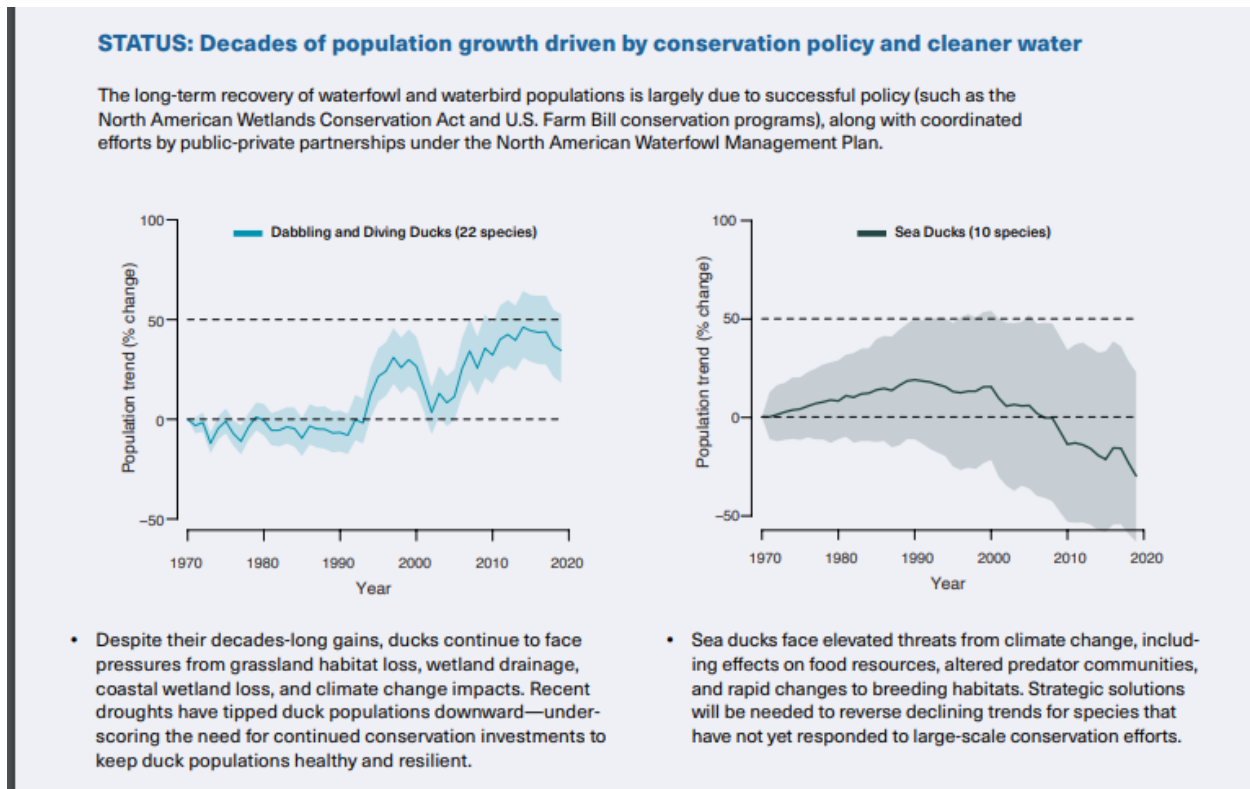
In 50 years, birds have increased overall in wetlands, a singular exception that shows the way forward for saving birds and benefiting people.

Trends for breeding bird species by group or by habitat during 1970–2019, except for the shorebirds trend, which begins in 1980.



Note that there has been a 30% drop in sea duck populations since 1970. Most of that has occurred since 2000.

As illustrated below, sea duck populations have been in decline since the late 1990's, for a variety of reasons. While hunting may be a contributing factor in some cases, other factors also need to be considered. On the other hand, dabbling and diving ducks have seen steady increases starting in the 1990's. The report gives hunters, through their conservation efforts such as protecting wetlands, some of the credit for recovery of dabbling and diving ducks.



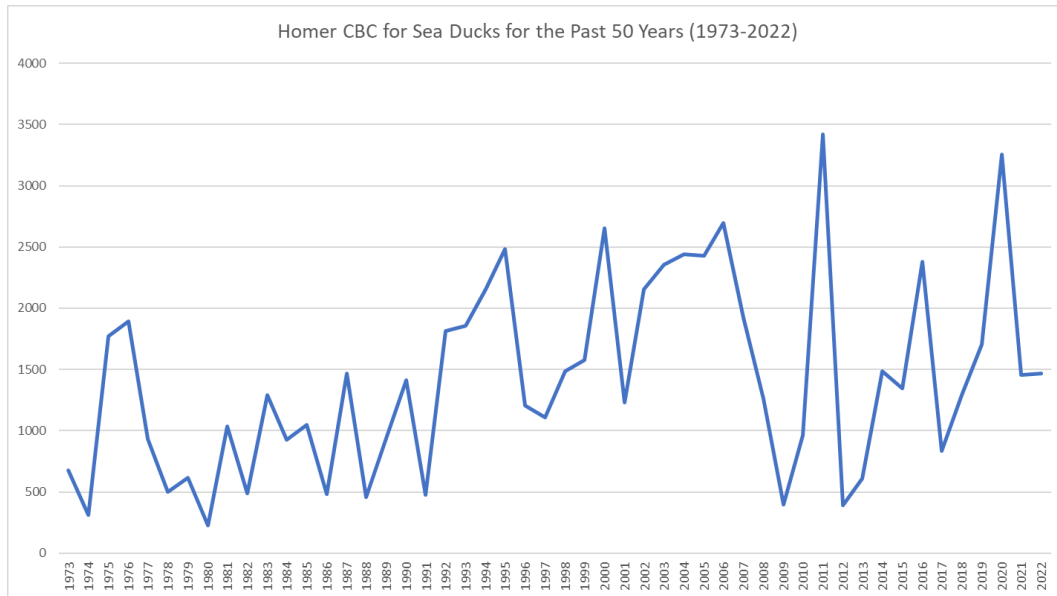
The sea duck species included in the chart above includes the following.

Common Name	Survey	aou	1970 - 2019 Change (%/yr)			3 Generation Change (%/yr)			Tipping Pt	Group
			Trend	2.5% Ci	97.5%CI	Trend	2.5% Ci	97.5%CI		
Barrow's Goldeneye	CBC	1520	1.378791	0.668384	2.146883	2.198171	0.115315	4.144726		Sea Ducks
Black Scoter	CBC	1630	-2.46548	-4.34899	-0.52183	-1.99666	-6.64932	3.421374	x	Sea Ducks
Bufflehead	CBC	1530	0.553625	-0.70017	1.817735	1.958054	1.054071	2.912006		Sea Ducks
Common Eider	CBC	1590	-6.3177	-19.287	8.326944	-0.2218	-34.699	51.19761		Sea Ducks
Common Goldeneye	CBC	1510	-0.3054	-1.15867	0.433434	0.352486	-1.38344	2.130719		Sea Ducks
Harlequin Duck	CBC	1550	0.555404	-0.7514	1.885391	0.709002	-3.28695	4.249297		Sea Ducks
King Eider	CBC	1620	-8.27663	-10.0931	-6.34576	-10.2039	-14.5972	-5.88514	x	Sea Ducks
Long-tailed Duck	CBC	1540	-3.63733	-5.47278	-1.74929	-3.71028	-7.32608	0.216084		Sea Ducks
Surf Scoter	CBC	1660	0.187609	-0.22364	0.598399	0.553777	-0.68216	1.756389		Sea Ducks
White-winged Scoter	CBC	1650	-1.25488	-2.83111	0.319645	-0.63442	-5.00216	3.889426		Sea Ducks

Of the ten species listed in the table, six have negative population trends from 1970-2019. All ten species occur in Kachemak Bay, although King Eider are considered rare.

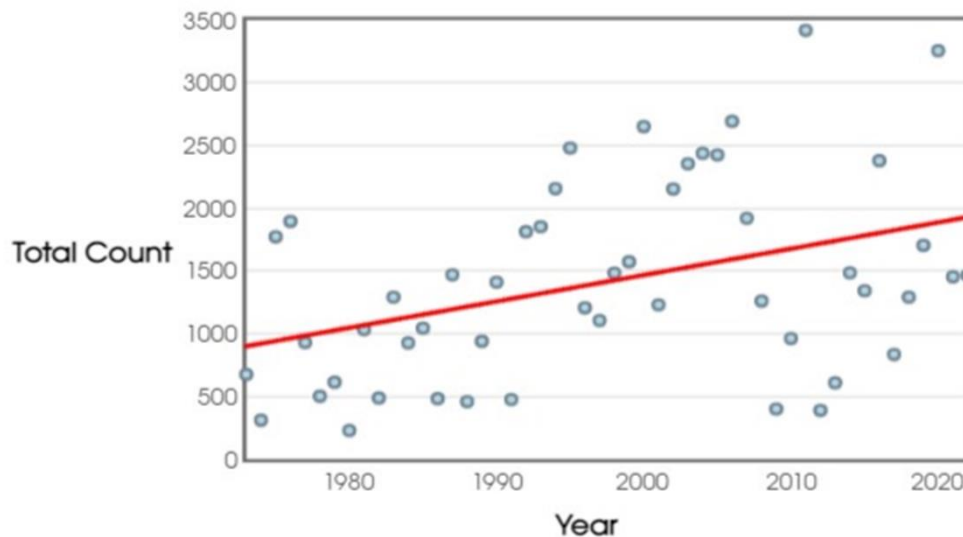
While it should be clear that sea duck populations are in decline in North America, that doesn't necessarily apply to Kachemak Bay. Some verification is needed. But finding datasets in Alaska that go back fifty years or more is rare. However, the Homer Christmas Bird Count (CBC) was started in 1960 and has been done every year since 1973- fifty consecutive years. And as one might expect, waterbirds (including sea ducks) have been prominent species on Homer CBC lists. It should also be noted that several other coastal cities in Alaska have overwintering sea ducks and annual CBC's. Cumulatively, this database could provide a broader statewide perspective of sea duck populations and should be part of ADF&G's analysis.

I recently did an analysis of the Homer CBC data to see what trends might be apparent. To get to the bottom-line, the scatter chart below illustrates the total sea duck count for the Homer CBC for the past 50 years. See Appendix A for the text of the full report, Appendix B for spreadsheets, and Appendix C and D for graphs.



As you can see there is a lot of variation from year-to-year, but it appears as if there might be an upward trend for Homer. Illustrated below is a Simple Linear Regression which gives a better sense of the direction.

Homer CBC Sea Duck Count for 55 Years (1973-2022)

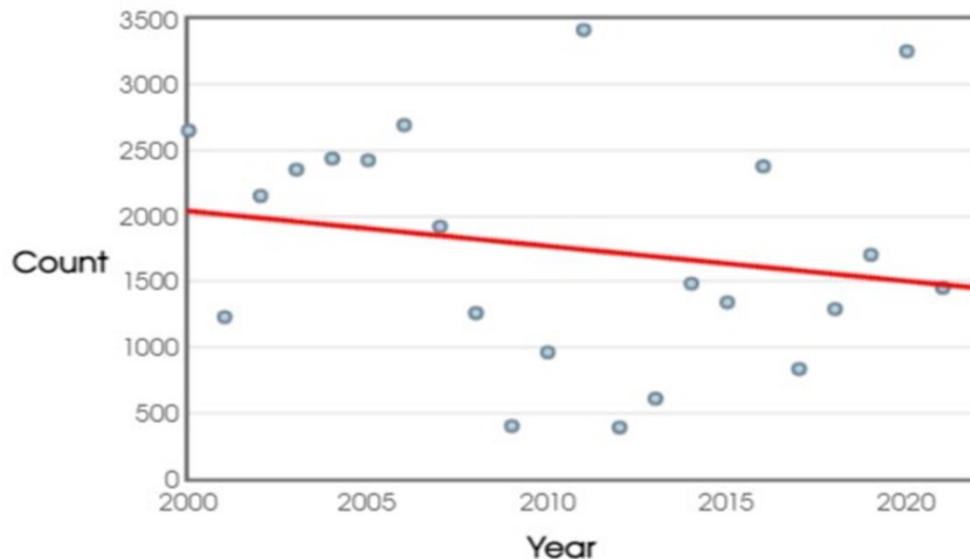


However, as shown in CBC details (<https://www.audubon.org/conservation/science/christmas-bird-count>), in Homer there has also been a steady trend in Homer towards more volunteers. The

number of volunteers went from 1,3, and 4 volunteers the first three years to 34, 35, and 30 volunteers the last three years. Is the upward trend based to some degree on more volunteer participation?

Since 2005 when there were 14 volunteers, the number of volunteers has been in the 20's and 30's, averaging 27.6 for the past 16 years on record. This timeframe happens to roughly coincide with the national decline in sea ducks. So, to minimize the variables in order to test how well sea duck national trends fit the Homer CBC data, it might be better to just compare the two from 2000 on.

Homer CBC Sea Duck Count 23 Years (2000-2022)



When that is done, the Homer CBC data closely matches national trends. Going from a count of about 2,000 in the year 2000 to about 1,500 in 2022 is about a 25% decline, slightly less than the national trend for the past 50 years. But if this decline is due in part to breeding habitat loss as stated earlier, I would expect Alaska to be a bit less since what is the national trend because it probably has had less loss of breeding habitat.

Appendix C and D provide a more detailed, species/taxa look at the Homer CBC, both in terms of the last 50 years and since 2000. Contrary to what Proposal 163 claims, the Homer CBC does show declines for several species of sea ducks. During the last 22 years there have been declines with scoters, Long-tailed Ducks, mergansers, Harlequin Duck, and eiders. While the area covered by the Homer CBC includes the Homer Spit, which is a small fraction of Kachemak Bay, there is no reason to expect any substantial difference in sea duck presence between the Homer Spit and other parts of Kachemak Bay.

Proposal 163 disparages “anecdotal or biased claims” and it seems this is meant to apply to databases like the CBC. But CBC data is by no means anecdotal. It has been following essentially the same well tested protocol for the past 122 years. Observations are by established subsections of the counting circle and reviewed by skilled birders before being submitted and entered into the CBC database. This is an open access database that is used by many scientists and avid birders. Audubon, who maintains the database, says that “CBC data have been used in hundreds of analyses, peer-reviewed publications, and government reports over the decades.”

The bottom-line in this discussion is that despite the assertion by Proposal 163 that “The [previous] reductions in bag limits for eiders, harlequin ducks and long-tailed ducks were not based on best available scientific data,” there is solid evidence to the contrary. On national scale the prestigious journal *Science* says otherwise. And on a Kachemak Bay scale, the Homer CBC data for sea ducks seems to reasonably match national data for the past two decades. Also, it shows that there has been a decline with some sea duck species over the last two decades, which generally supports anecdotal observations by astute long-term residents who have been closely watching where they live for many decades and have voiced concern these declines.

To rescind previous sea duck restrictions, as advocated by Proposal 163, would most likely continue the population decline that sea ducks have experienced over the past two decades. That would be unacceptable to most of those who live in the Kachemak Bay area who want to see sea duck populations restored to what they use to be, or as close to that as possible, recognizing that climate change may also be a factor to contend with. This would be to the benefit of sea duck hunters and everyone else.

Sincerely,
George Matz
Fritz Creek, AK

Appendix A

**Kachemak Bay Waterfowl and
Fifty Years of Homer Christmas Bird Counts**

by
George Matz

The Christmas Bird Count (CBC), sponsored by the National Audubon Society, is “the longest-running citizen science survey in the world” according to Wikipedia.. The first CBC in 1900 was the inspiration of Frank Chapman who organized 27 volunteer birders to undertake CBCs at 25 sites ranging from cities in the northeastern United States to Toronto, Ontario, to California. The CBC now happens annually in over 20 countries in the western hemisphere. Last year, a pandemic recovery year, there were 2,646 counts with a total number of 76,880 observers comprised of 64,882 in the field and 11,998 at feeders. Birders saw 2,554 species, plus 483 identifiable forms and hybrids and 42,876,395 birds of all species tallied.

The protocol used at the first CBC is essentially the same as what we use now. Between December 14 and January 5, count volunteers follow specified routes through a designated 15-mile (24-km) diameter circle, counting every bird they see or hear over a 24-hour period. These reports are given to a compiler who reviews the data for accuracy and then submits the results to the National Audubon Society who compiles and archives all the results. The longevity of this effort and that a protocol has been consistently followed has created a valuable database for scientific study. Audubon says, “CBC data have been used in hundreds of analyses, peer-reviewed publications, and government reports over the decades.”

The first Homer CBC was in 1960 which used a 15-mile diameter circle with its center in Mud Bay. This circle is still being used. It includes the entire Homer Spit which is all within Homer city limits. However, large portions of this circle include Kachemak Bay waters which are rich in waterbirds, even during the winter because the bay is mostly ice-free (Mud Bay being a frequent exception). Early attempts to bird the waters within the circle by boat were often stymied by winter weather. But rather than have this uncertainty embedded in our count records, use of a boat was discontinued. Now observations of Kachemak Bay waterbirds are mostly done onshore from various spit locations.

Following the inaugural year, Homer CBC's were done in 1962, 1963, 1965, 1971, and then 1973 – 2022, all using the same count circle. Fifty years continuous of data - a rare occurrence for Alaska. Recent years has seen almost an order of magnitude increase in the number of volunteers, thus providing more thorough coverage of the circle area, and perhaps, more sightings than would have been logged if participation were at the level of earlier years. The Homer CBC is now cosponsored by Kachemak Bay Birders and the Alaska Maritime NWR. Dave Erikson, the coordinator/compiler has been involved with the Homer CBC since 1976. Many volunteers have participated for decades. Stability in the coordinator and volunteers helps reduce observer bias. Also, I think long-term support by many citizen science volunteers is more reliable than agency funding.

Given the current concern in the Kachemak Bay area regarding the population status of overwintering sea ducks (including diving ducks), this 50-year Homer CBC dataset can provide valuable insight into long-term population trends. It can also provide a comparison and supplemental data to other sea duck databases, such as the more rigorous ADF&G's Kachemak Bay Wintering Waterfowl Survey. This survey has two components; 1) a near-shore boat-based survey taking several days to cover all the Kachemak Bay shoreline, and 2) is an airplane survey following transects in deeper waters. ADF&G's survey was initiated in 1999, but due to funding limitations is not done every year. There have been only 10 surveys in the last 22 years and scheduling has not been consistent, often with variable gaps.

The attached Excel tables and charts illustrate the trend lines for sea ducks (including diving ducks) that were observed in the Homer Spit area during CBCs over the past 50 years. These tables and charts were derived from an Audubon Christmas Bird Count download for the Homer CBC circle. <https://www.audubon.org/conservation/science/christmas-bird-count>

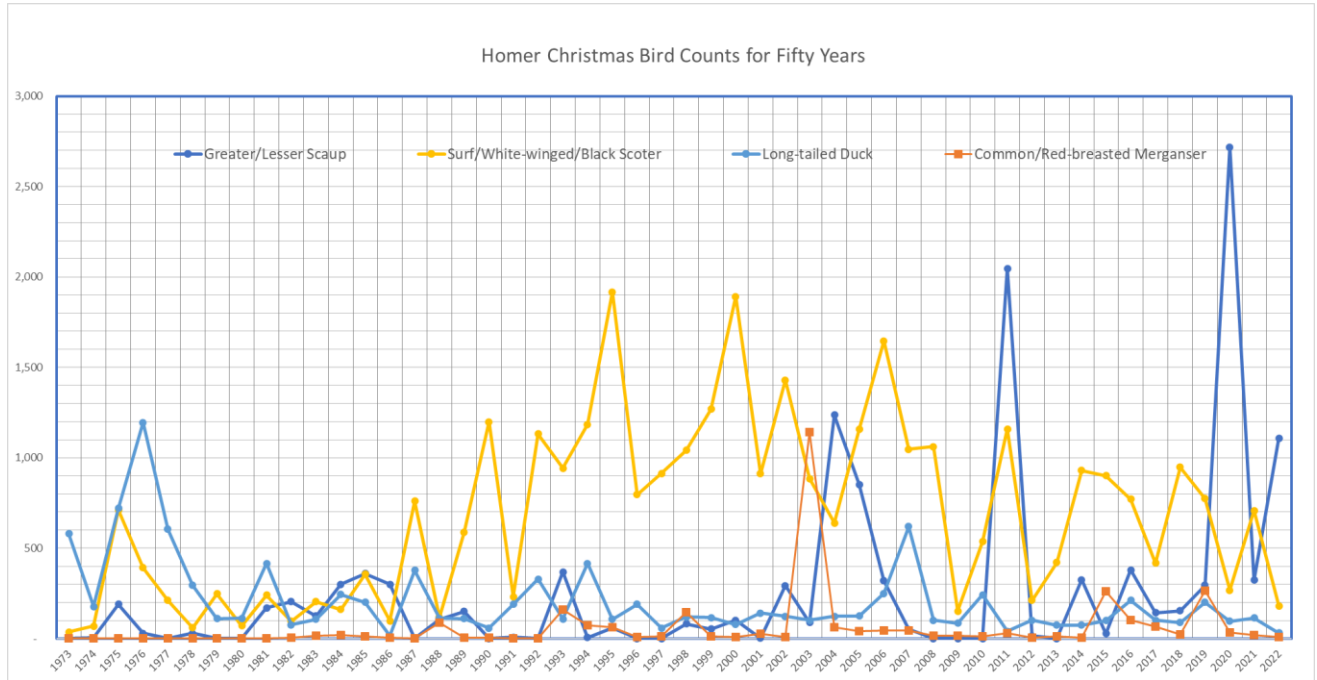
Sheet 1 for this file has two tables, one being all the waterfowl (geese, swans, and ducks) species included in the Audubon download. The second table has just those species that were observed in at least 50% of the CBC counts. This table doesn't have any geese or swans since these birds rarely occur in Kachemak Bay during midwinter. The ducks include dabblers, divers, and sea ducks. The only dabbler that meets the 50% criteria is the Mallard. But it was not included in further analysis since in winter it is mostly in the Mud Bay area unless that freezes over, in which case the ducks fly to the south side of the bay which is mostly outside the circle. The result is that in warm winters the Homer CBC sees lots of Mallards (one of the top species), but in cold winters there will be few if any. Although ADF&G waterfowl hunting regulations lump diving ducks (Bufflehead, Barrow's Goldeneye, and Common Goldeneye) in with dabblers using the term "general duck", they are considered sea ducks in this analysis.

To simplify matters, Sheet 2 uses the data from Sheet 1 to group these ducks into taxa. For instance, Scoters includes Black, Surf, and White-winged Scoters. This data was then used to generate scatter plots. The scatter plots do a good job of illustrating how variable things may be from year to year, but it is hard to discern whether the population for a taxon is increasing or decreasing. So, below each scatter plot are two charts for each taxon with a simple linear regression analysis. The first chart is for all 50 years and the second chart is from 2000-2022, which coincides with the years when ADF&G did their sea duck surveys. Having two charts illustrates in some cases that the 50-year population trend for a taxon may be increasing, but at a slower rate, or even decreasing, after 2000.

Sheet 3 is the entire Homer CBC download from Audubon which includes all species observed.

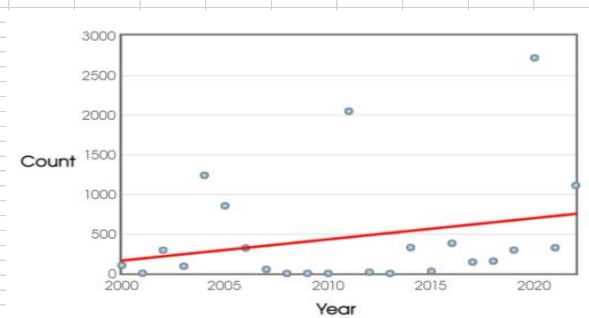
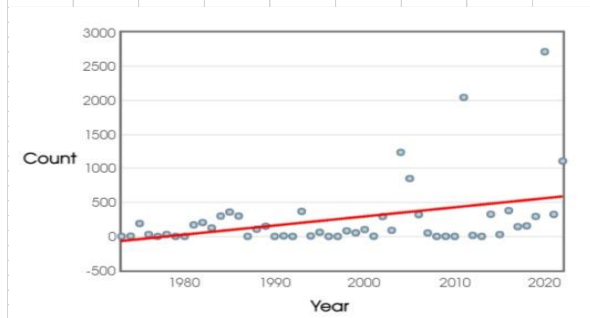
In summary, this analysis should provide a better basis for understanding population trends with sea ducks that overwinter on Kachemak Bay. It will also provide better justification for making any changes to the Alaska Waterfowl Hunting Regulations in order to sustain Kachemak Bay populations and opportunity to hunt and observe these beautiful birds.

Appendix C

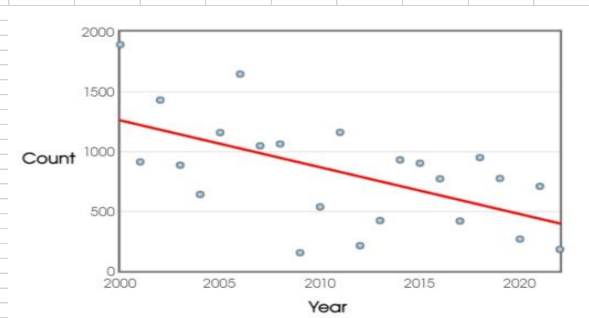
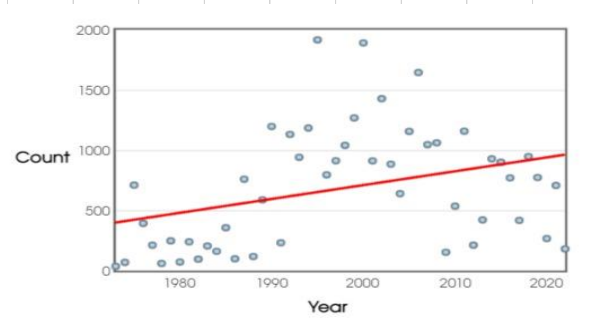


Simple Linear Regression Charts by Species/Taxa

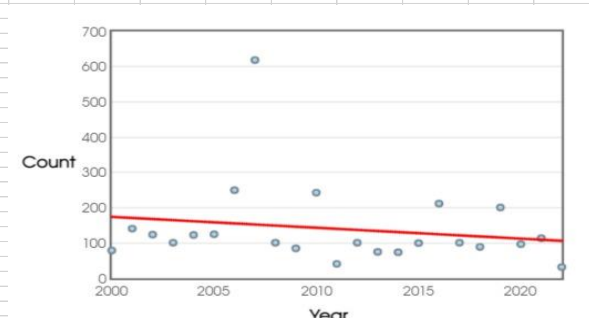
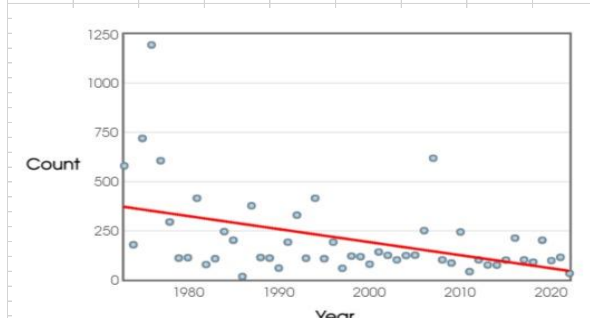
Scaup (Greater & Lesser) 50 Years 22 Years



Scoter (Surf, White-winged, & Black)

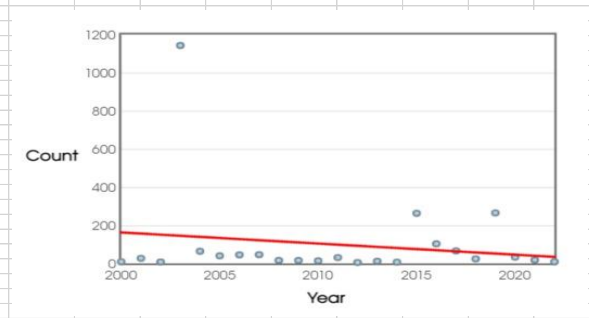
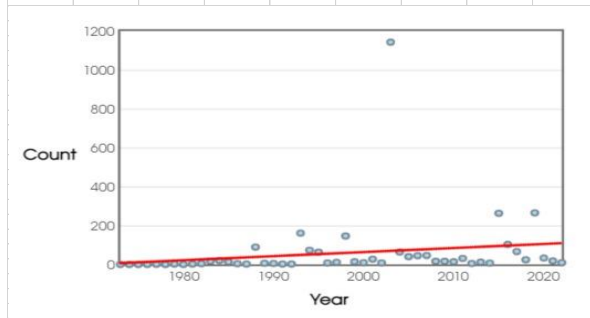


Long-tailed Duck

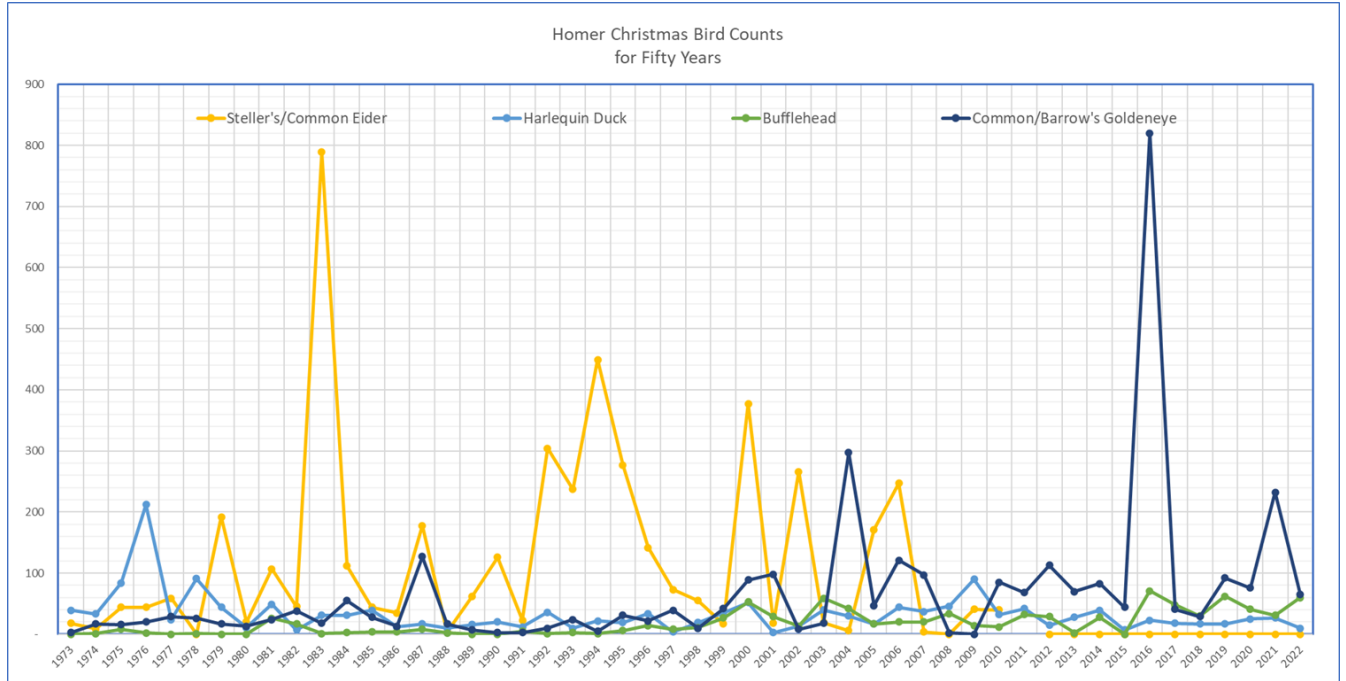


Note: The loss of the fish processing plant from fire in the Homer Harbor in 1998 has probably had an affect on the Long-tailed Duck population that overwinter in Kachemak Bay. The fish waste in th outfall near the entrance to the harbor attracted many ducks, including Long-tail Ducks.

Merganser (Common & Red-breasted)



Appendix D



Simple Linear Regression Charts by Species/Taxa

