



April 9, 2021

Mr. Peter Silva, President  
California Fish and Game Commission  
P.O. Box 944209, Sacramento, CA 94244-2090

**RE: 2021-22 Waterfowl Seasons and Bag Limits – Support DFW Recommendation**

Dear President Sliva:

The California Waterfowl Association urges you to support the Department of Fish and Wildlife's regulatory recommendations for the 2021-22 waterfowl season, which includes a liberal season length and 7 bird bag limit for mallards, as well as a January 31<sup>st</sup> closing date for all ducks in the Balance of State, Southern San Joaquin and Southern California Zones.

We have come to this decision after much recent debate and deliberation over the conservation of our local mallard population. The breeding mallard population remains well below its long-term average, while harvest numbers on mallards are also down since the late 1990s according to the U.S. Fish and Wildlife Service. In 2020, many thousands of local mallards that molt on the Klamath Refuges died due to an avian botulism outbreak that was exacerbated by drought and reduced water deliveries. This year, we are facing a second year of drought which will undoubtedly result in poor nesting and brood water conditions.

The quantity and quality of breeding habitat is by far the strongest driver in the health of our mallard populations, and that's where the primary focus should remain. We agree that all waterfowl conservation decisions must be science-based, like those through the Flyway-based process. Given the negative, long-term breeding population trend, expansive agricultural land-use changes away from wildlife friendly commodities, and the ongoing drought, we believe additional analysis needs to be undertaken as to the causes of the apparent decline in breeding mallards and hunter success in California. Specifically, there should be a review of other biological metrics that are not explicitly captured under the Western Mallard Model that is used to provide a framework for seasons and bag limits.

The last comprehensive, multi-regional breeding mallard study in California took place in 1985. Reassessing breeding habitat, population dynamics, and a better path forward nearly 40 years later seems like a reasonable and appropriate step.

We hope to work with the Department of Fish and Wildlife, U.S. Fish and Wildlife Service, others within the waterfowl science community and hunters to examine those factors to determine how best to address them.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in blue ink that reads "Mark Hennelly". The signature is written in a cursive, flowing style.

Mark Hennelly, Vice President of Legislative Affairs  
California Waterfowl Association

cc: Members, California Fish and Game Commission  
Mr. Stafford Lehr, Deputy Director, California Department of Fish and Wildlife