

California Waterfowl Association (CWA) would like to take this opportunity to provide input on the draft Comprehensive Conservation Plan (CCP) for the San Luis National Wildlife Refuge (NWR) Complex. Specifically, our comments focus on proposed management activities that would increase and enhance hunting opportunities.

CWA is a 20,000-member nonprofit organization dedicated to the conservation of California's waterfowl and wetland resources, and the protection and expansion of hunting.

First, it's worth mentioning that public hunting access and opportunity—particularly for waterfowl—is especially important for California hunters. Unlike other types of hunting, there are simply not enough quality public waterfowl hunting opportunities to always meet hunter demand. This leads to frustration for many hunters and results in reduced participation.

Drawing a waterfowl hunting reservation is extremely difficult at many California NWRs and State Wildlife Areas, particularly in the Central Valley and Southern California, with average draw odds now increasing to 27:1 and some odds for certain areas as high as 260:1. [2022-2023 Waterfowl Drawing Statistics \(ca.gov\)](https://www.waterfowl.org/california/waterfowl-drawing-statistics)

For those who are not drawn, they must undertake considerable, additional efforts for the chance to hunt on a given day. Sportsmen and women will oftentimes go through the rigors of preparing to hunt, traveling several hours to a public area at night in order to enter a lottery, waiting for a drawing, sleeping in the parking lot or returning to the refuge in the early morning before shoot time and, after all of that, ending up waiting hours in line throughout the morning or early afternoon before they can access the area.

Most NWRs and State Wildlife Areas in California typically offer only three waterfowl hunting days per week, some even fewer. Those who try to hunt without a reservation can find themselves among 200-300 other people waiting in line for an opportunity to hunt that may not come by the 3:00 pm cutoff time. Opening up more lands to waterfowl hunting would not only help to address hunter demand, but would help relieve hunter pressure on other NWRs and State Wildlife Areas.

In California, less than 1% of all the federal land is owned or managed by the U.S. Fish and Wildlife Service (Service), which is amongst the lowest percentage of the 50 states. Other federal lands, like those administered by the U.S. Forest Service and Bureau of Land Management, rarely offer any waterfowl hunting opportunities. In addition, because of the large population of the state (almost 40 million) and resulting high density of people in certain regions, many other public lands and waters are off-limits to waterfowl hunting.

NWRs and State Wildlife Areas are typically where new hunters are recruited into waterfowl hunting in California, in part because the costs of joining a private club are simply too high for most new hunters to invest in. For example, a seat in a rice blind in the Sacramento Valley costs, at minimum, about \$2,000. A membership at a managed marsh duck club will run into the tens of thousands of dollars or even more.

Since 2012, duck stamp sales in California have been generally declining. Last year, only about 62,000 state duck stamps were sold, which is the second lowest amount on record. [License Statistics \(ca.gov\)](#) From the hunter input and feedback we have received, including annual surveys conducted through CWA's website, it appears that lack of sufficient access to productive waterfowl lands is a primary reason why people are hunting less or quitting altogether.

The Service can help address these issues and support hunting recruitment, retention and reactivation (R3) by providing additional, high quality hunting opportunities, including at the San Luis NWR Complex.

Specifically, we ask that you consider the following hunting-related recommendations for the San Luis NWR Complex:

- Open at least a portion of the 1900-acre Snobird unit of the Merced NWR to waterfowl hunting (especially geese). It is our understanding that public access (walk-in) could be provided to this unit, and that there are adjacent areas suitable for parking. We also acknowledge that additional wetland restoration work is needed, and that budget issues may limit Service capacity to flood wetlands. However, given that significant waterfowl concentrations can already be found there at times and that there are no conflicts with other priority wildlife-dependent recreational uses, we believe the Snobird unit offers an excellent opportunity to provide new hunting access.
- Flood managed wetlands as early as possible both within the hunt area and sanctuaries, which would allow for increased hunter quotas and help to attract more waterfowl to the Grasslands early in the season. (Note that we acknowledge that annual water allocations and drought conditions may limit this ability, however.) While we recognize the logic behind delayed flooding and the desire to have sufficient food resources for waterfowl later in the season, please note that available food is not generally a limiting factor for waterfowl in the Central Valley. This was recently demonstrated by body condition surveys in January during the last several drought years which showed little impact on waterfowl body weights compared to other water years.
- To the extent possible, maintain an equitable balance of free roam, assigned ponds and blind areas within the NWRs of the San Luis NWR Complex, both in terms of quantity and quality of hunt opportunities. As you are aware, preferences on hunting sites vary amongst waterfowl hunters. Our own surveys suggest that public area hunters want an array of options. The Complex has done a good job of providing diverse opportunities for waterfowl hunting, including boat hunting opportunities, and we urge it to continue to do so as referenced in Hunt Program Strategy 4.2.1.
- Regarding Hunt Program Strategy 4.2.19 for the Blue Goose unit, we would urge that the Service first solicit hunter input and feedback on any proposal that would reduce

hunting hours, days or opportunity. Maintaining hunting quality is an important goal, but any loss of hunter opportunity should also be fully mitigated.

- Provide annual deer and elk hunting opportunities for the public in appropriate areas. Please note that manager(s) of several State Wildlife Areas in the Grasslands have determined that deer hunting could be safely and sustainably provided on those areas, and that regulatory changes currently pending before the California Fish and Game Commission would, in fact, allow for that additional hunting opportunity.

Thank you for the opportunity to provide comments on the draft CCP. Should you have any questions about our input or need more information, please feel free to contact me at the email address below or 916-612-0230.