



















November 30, 2018

Mr. Eric Sklar, President California Fish and Game Commission 1416 Ninth Street, Suite 1320 Sacramento, CA 95814

RE: Duck Season Framework Closing Date Modification Recommendation for 2019/20

Dear President Sklar:

It has come to our attention that the Service Regulations Committee recently approved a regulatory modification that allows states to keep their regular duck seasons open through January 31st, regardless of calendar year.

We strongly urge you to ultimately approve this modification for our Balance of State, Southern San Joaquin, and Southern California Zones, including for the 2019/20 season to allow for the hunting of ducks through Friday, January 31st 2020. It is our understanding that, because of timing issues, this modification was not included in the Initial Statement of Reasons for the 2019/20 season. And that in order for it to be an option for approval at your April 2019 meeting, the Preadoption Statement of Reasons must include this modification.

Our organizations, which collectively represent tens of thousands of duck hunters and landowners throughout California, support the January 31st closing date modification for the following reasons:

- In California, waterfowl hunting opportunity in most zones is generally better late in the season. For example, in the last few years during the last week of the season many California refuges and wildlife areas saw the number of waterfowl taken per hunter exceed 3-4 birds, which was considerably higher than the season-long average.
- It does not increase the total number of duck hunting days allowed within the Pacific Flyway, and should not adversely affect duck populations. However, it does allow the Balance of State, Southern San Joaquin, and Southern California Zones to use up to five (5) hunt days for ducks that have long been authorized in the Pacific Flyway but currently are not utilized.
- Surveys conducted by California Waterfowl have consistently shown that waterfowl hunters value the number of days in the field over other considerations. Specifically, our latest webbased hunter survey from March of 2018 asked "should 5 additional (duck hunting) days be incorporated into the season" in the Balance of State Zone. 65% (793) of respondents answered "yes" and 35% (431) answered "no".
- It would still allow the post-season youth hunt to occur up to two weeks later. Generally, California has held its post-season youth hunt one week after the close of the regular season on a Saturday and Sunday; thus, we would recommend that the 2020 youth hunt occur on February 8-9.
- It could incentivize private duck clubs, including those operated as managed wetlands and postharvest flooded agricultural fields (e.g. rice, corn), to maintain flooded habitat on their property for a longer duration of time.
- It would arguably help simplify regulations by creating a date certain ending to the regular duck season. While in many years this would require ending the season on a non-Sunday, please note that in California this already occurs in one of our zones (e.g. NE Zone); and, that it still allows duck season to open on a Saturday.

Thank you for your consideration.

Sincerely,

Mark Hennelly, California Waterfowl Association

Dermin Blate

Dennis Slater, Tulare Basin Wetlands Association

John & Den

John Devney, Delta Waterfowl

Leger S. Mammon

Roger Mammon, Lower Sherman Island Duck Hunters Association

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Ric Ortega, Grassland Water District

Made Fle

Maddy Folk, The Black Brant Group



Don Kirby, Cal-Ore Wetlands/Waterfowl Council

James M. Stice

James Stone, Northern California Guides and Sportsmen's Association

Paul Buttur



Todd Manley, Northern California Water Association

cc: Members, California Fish and Game Commission

Ms. Melanie Weaver, California Department of Fish and Wildlife