



June 8, 2020

RE: Proposed Refuge Hunting Opportunities

To Whom It May Concern:

The California Waterfowl Association (CWA) would like to take this opportunity to provide comments on the U.S. Department of Interior's (Interior) proposed expansion of hunting and fishing opportunities on National Wildlife Refuges (NWRs) and related lands.

CWA is a 21,000-member nonprofit organization dedicated to the conservation of California's waterfowl and wetland resources, and the protection and expansion of hunting.

First, we strongly support and commend Interior for its continued efforts to expand hunting and fishing access and opportunity across the United States. Especially as it relates to waterfowl hunting, this action is necessary to accomplish federal and state hunting recruitment, retention and reactivation (R3) goals and objectives.

As you know, such R3 efforts, if successful, will ultimately lead to greater funding for wildlife habitat and other conservation work through increased sales in hunting licenses, stamps, tags and other validations as well as Pittman-Robertson excise tax revenues, all of which is vital to continuing the North American Model of Wildlife Conservation.

We are therefore pleased to see the proposed increase in hunting opportunities in the various states, and urge that those be approved as part of the final rule; however, please note that in California, no new waterfowl hunting opportunities are proposed at this time, and our comments here focus on the ongoing need to address that particular issue.

Public waterfowl hunting access is especially important in California. Unlike many other states, there are simply not enough quality public waterfowl hunting opportunities to always meet hunter demand. This leads to frustration for many hunters in our state and results in reduced hunter participation.

Drawing a waterfowl hunting reservation is extremely difficult at many California NWRs and State Wildlife Areas, particularly in the Sacramento Valley and Southern California, with some odds as high as 138:1.

For those who are not drawn, they must undertake considerable additional efforts for the chance to hunt. 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 refuge.

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 never come.

In California, less than 1% of all the federal land is owned or managed by the U.S. Fish and Wildlife 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 steadily declining. 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.

Some specific California NWRs where Interior should consider opening up new waterfowl hunting opportunities are as follows: San Joaquin River NWR (currently closed to all hunting), Snobird unit of the San Luis Complex (currently closed to all hunting), the federal Llano Seco unit of the Sacramento National Wildlife Refuge Complex (currently closed to all hunting) and the Skaggs Island Unit of the San Pablo Bay NWR (currently closed to all hunting). Opening a targeted portion of each of these lands to some waterfowl hunting would not only help to address hunter demand, but would help relieve hunter pressure on other NWRs and State Wildlife Areas.

We understand that budget issues may complicate opening some of these areas to hunting. That is why we furthermore strongly urge Interior to direct greater funding for refuge operation and maintenance as well as staff. Especially in California where wetlands, for example, must be intensely managed on an annual basis in order to maintain habitat values, it is critical that the U.S. Fish and Wildlife Service have sufficient funding to support its lands.

Managed wetlands in California also, of course, need reliable water supplies, and this is perhaps most evident at the Lower Klamath NWR (which is part of the Klamath Basin—the most important staging area in the entire Pacific Flyway.) As you are aware, because of severe water shortages beginning in 2001 due to competition for water from endangered fish species, lack of senior water rights, increased water pumping costs, long-term drought, etc., waterfowl numbers have continued to decline at that refuge, greatly reducing hunter opportunity. Addressing Lower Klamath NWR's water needs would help to reverse that downward trend and boost hunter use and numbers. CWA appreciates Interior and the U.S. Fish and Wildlife Service's ongoing efforts in this regard, and strongly urge you to continue that important work.

California arguably represents the most significant opportunity to enhance and expand waterfowl hunting on NWRs in a manner that will address overwhelming demand while also reversing declining trends in hunter participation. As Interior and the U.S. Fish and Wildlife Service continue to open NWRs to additional hunting opportunity, we respectfully urge you to specifically address waterfowl hunting access needs in our state as part of that important effort.

Thank you for the opportunity to provide our input.

Sincerely,



Mark Hennelly, Vice President of Legislative Affairs and Public Policy
California Waterfowl Association