



12 December 2023

RE: Public Comment on Proposed Expansion of San Pablo Bay National Wildlife Refuge

Backcountry Hunters & Anglers (BHA) welcomes the opportunity to comment on this draft legislation to expand the San Pablo Bay National Wildlife Refuge. BHA is a 501c3 non-profit organization dedicated to ensuring North America's outdoor heritage of hunting and fishing in a natural setting, through education and work on behalf of wild public lands, waters, and wildlife. BHA represents 350,000 members and supporters distributed throughout North America, including a robust contingent located in the Bay Area who cherish the Baylands, saltmarshes and waters that surround the San Pablo Bay,

We applaud the proposal by Reps. Garamendi, Huffman and Thompson to conserve the open space and wildlife habitat identified in this draft legislation and we offer additional perspectives and considerations to guide the legislative drafting process. BHA strongly supports the proposed conservation of wildlife habitat for not only fish and game species, but also the endemic, threatened, or endangered species that share the same habitats as the waterfowl, deer, quail and other quarry our members pursue. This enthusiasm is balanced with the need for access to provide opportunities to hunt and fish public lands and waters where fish and wildlife populations can sustain regulated take in order to procure nutritious and ethically sourced food for hunters, anglers and their families.

BHA recognizes the habitat value of the following parcels proposed for addition to the San Pablo Bay National Wildlife Refuge and support their inclusion into this draft legislation. The Bell Marin Keys Unit V, North Antenna Field, and Hamilton Army Airfield are all adjacent to the CDFW San Pablo Bay Wildlife Area which currently permits hunting. We are encouraged by the proposal which states that the “proposed expansion would direct the U.S. Fish and Wildlife Service to enter cooperative agreements with state agencies like California’s Department of Fish and Wildlife to manage the federal National Wildlife Refuge and nearby state conservation lands at landscape scale within the San Pablo Bay watershed.”

Hunting inside and adjacent to the San Pablo Bay has a long and rich history that predates the pervasive sprawl of development from urban centers of the Bay Area. In addition to conserving habitat from encroaching development, we want to emphasize the importance of maintaining access to hunt and fish these public lands and waters in a region that has lost significant access and opportunity over time. We encourage cooperation between the USFWS and state agencies and emphasize the importance of providing adequate funding to the National Wildlife Refuge System to support the habitat work and hunt programs within our nation’s cherished refuges.

We would like to specifically address the navigable waters of the San Pablo Bay along the Western shoreline of Mare Island, identified in the draft map as “Mare Island’s Exception Parcel 7.” As a navigable body of water, this shoreline is currently cherished by boat-in waterfowlers, and we highlight its importance to the hunting community when being considered for inclusion into the National Wildlife Refuge System. We recommend revising the map to exclude these

navigable waters of the Bay or adding safeguards to ensure that hunting access is not lost while advancing the laudable conservation goals of the proposed refuge expansion.

In summary, we thank you for the opportunity to comment on this draft legislation behalf of hunters and anglers. Our members and supporters care deeply about the conservation and stewardship of our public lands and waters and have a historied interest in preserving access and opportunity for our outdoor traditions.

Sincerely,

Devin O'Dea

Western Policy & Conservation Manager
Backcountry Hunters & Anglers

