

VENTANA WILDLIFE SOCIETY

Conserving Native Wildlife and their Habitats

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March 23, 2007

John Carlson, Jr., Executive Director
Fish and Game Commission
1416 Ninth Street
Box 944209
Sacramento, CA 94244-2090

Re: Draft Environmental Document Regarding Methods of Take for Big Game and Nongame Birds and Nongame Mammals



Dear Mr. Carlson, Jr.:

The Ventana Wildlife Society (VWS) is pleased to provide the following data in response to your published request for comments within a forty-five (45) day California Department of Fish and Game 'comment period,' which commenced on February 23, 2007 regarding:

Section 353 and 475 of Title 14 of the California Code of Regulations, pertaining to: Methods Authorized for Taking Big Game; and, Methods of Take for Non-Game Birds and Non-Game Mammals, with particular emphasis on the proposed mandatory use of Non-lead Ammunition in specific Hunting Zones frequented by California Condors within the State of California.

Following a focused review of your 60-page draft, VWS would like to outline and respond to two (2) specific subjects regarding said draft:

- 1) Our preference to accept Alternative #2 and 2) Our suggestion to re-define the hunt zones affected.

Subject 1

It is with a strong consensus and all due respect that VWS feels your proposed Alternative #1 does not go far enough to support the ultimate goal of achieving a non-lead hunting environment within specifically defined California Condor habitat, while on the other hand Alternative #3 is felt to be too extreme. As a consequence, **VWS supports Alternative #2**, with certain minor revisions to the boundaries of hunt zones affected (see subject 2):

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Subject 2

VWS recommends the following definition for the hunt zones affected because it excludes the Central Valley, an area where condors are not present. The benefit of re-defining the boundaries of the hunt zones in this way, is to minimize the number of hunters affected by the regulation.

Hunting Zone A South, D7, D8, D9, D10, D11 and D13, but excluding Santa Cruz, Alameda, Contra Costa, San Mateo and San Joaquin Counties, areas west of Highway 101 within Santa Clara county, and areas between Highway 5 and Highway 99 within Stanislaus, Merced, Madera, Fresno, Kings, Tulare and Kern Counties.



Taken together, these two recommended changes would enable the Department to regulate lead ammunition within the current and historic condor range while minimizing the number of hunters affected. The historic condor range within Hunt Zones D7 and D8 have been used by the current population on a limited basis (USFWS unpublished data) and it is highly likely that the birds will once again utilize the southern Sierra's again soon, which is why we urge you to support Alternative #2 and with the boundary revision described above.

We appreciate the opportunity to submit this information and recommendations within your forty-five (45) day comment period. Please note that VWS would be most interested in participating in further dialogue with the California DFG about these two specific subjects, or the remaining balance of your environmental document.

Respectfully,

Kelly Sorenson
Executive Director