Safari Club International
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July 14, 2014

VIA E-Mail, FAX and U.S. Post
Mr. Michael Sutton, President,
Mr. Jack Baylis, Vice President.
Mr. Jim Kellogg
Mr. Richard B. Rogers
Ms. Jacque Hostler-Carmesin
Mr. Sonke Mastrup, Executive Director
California Fish and Game Commission
P.O. Box 944209
Sacramento, CA 94244-2090

Re: Request for Transparency, Structure and Fairness in the Operations of the California Wildlife Resources Committee

Dear Sirs and Madam:

On behalf of the California chapters of Safari Club International (SCI California), we are submitting this letter to request major changes in the manner in which the California Wildlife Resources Committee (WRC) conducts its business. In the past several months and continuing into the present, the WRC has operated without formal procedural constraints. As a result, the WRC and by implication the entire Fish and Game Commission (Commission) have created the appearance that they are bodies that make decisions without fairness and based on the agendas of certain interest groups who have special access to the WRC and the Commission. Without procedural rules that require that all interest groups be given equal access to the WRC's decision-making processes, all recommendations made by the WRC and all determinations that the Commission makes based on WRC recommendations violate the law and potentially harm the resources that the Commission is obligated to protect.

Safari Club International Chapters in California

There are thirteen California Chapters of Safari Club International, collectively representing over 5,000 members and 30,000 California affiliates who hunt and participate in sustainable wildlife conservation. SCI chapters and their members participate in numerous conservation projects throughout the state. SCI California Chapters attend WRC and Commission meetings and make every effort to play active roles in the state's decision-making concerning

wildlife conservation and management. The activities of the WRC have deprived SCI California Chapters and their members of fair and equal access to these important decisions.

The WRC and Commission Have Created the Impression That Only Certain Interest Groups Have Access to Their Decision-Making Processes

The July 28, 2014 meeting agenda for the WRC includes "Discussion of Options to Implement Non-lead Ammunition Requirements" and identifies a presentation on this topic by Audubon California, Defenders of California and the Humane Society of the United States. To SCI California's knowledge, no organization or individual representing the hunting community was offered the opportunity to make a presentation on this issue. Similarly, on the agenda for the January 15, 2014 meeting included a "Discussion and Update of Predator Management Subcommittee's Recommendations for Changes to Predator Management Policies/Regulations." The recommendations reviewed by the WRC for this discussion were submitted by only two entities, HSUS and Project Coyote. To SCI California's knowledge, no organization or individual representing the hunting community was asked to participate on the Predator Management Subcommittee or to engage in the development of the recommendations for changes to the Predator Management Policies/Regulations.

The WRC is patently offering access to only certain interest groups for development of its recommendations and presentations. If the WRC, and by implication the Commission, wants to avoid the appearance, taint and potential invalidity of its decisions due to inappropriate bias, it should take immediate action to create procedures and regulations that impose measures to prevent such bias.

The Commission Must Establish and Publish Procedural Rules for the WRC Before the WRC Makes Any Further Recommendations or Takes Any Further Actions

Currently, the WRC is operating without formally adopted or publicized procedures for its decision-making process. Nevertheless, the WRC has already held a meeting on January 15, 2014 and plans another meeting for July 28, 2014. Without such established procedures, all WRC recommendations are potentially invalid and will have a similar impact on the decisions that the Commission makes that are based upon these recommendations. In the absence of such procedures, the public, and in particular members of SCI California Chapters, cannot actively participate in the WRC meetings and recommendations in a meaningful and significant way.

In a July 8, 2014 e-mail from Executive Director Sonke Mastrup to Kathy Lynch, Mr. Mastrup admitted that the WRC has no formal procedures established for their meetings and referred to the WRC meeting scheduled for July 28, 2014 as a "workshop." Unfortunately, the labeling of the meeting as a "workshop" offers little to the public in terms of how to offer meaningful participation in the WRC's work. The "workshop" label does nothing to remedy the imbalances in the access gained by certain interest groups and does not appear to have any impact on the Commission's use of and reaction to the WRC's recommendations. Informality does not excuse bias or illegality. Consequently, SCI California Chapters strongly recommend that the WRC July 28, 2014 "workshop" be cancelled (as was the May

2014 WRC meeting) and that no future meetings be scheduled until fair and predictable procedures can be adopted. In addition, the public should be permitted to play a role in establishing such procedures, to make certain that the WRC's agenda and its subcommittees are fairly represented by all or at least a balanced share of the constituencies interested in the WRC's and Commission's responsibilities.

The Commission Must Clarify Its Relationship With the WRC As Well as The Extent of the WRC's Authority

SCI California Chapters are very concerned that the lines between the WRC and the Commission have been blurred. According to the information on the Commission's own website, the WRC cannot operate instead or on behalf of the Commission. "It is important to note that the committee chairs cannot take action independent of the full Commission. Instead, the chairs make recommendations to the full Commission at regularly scheduled meetings." Consequently, SCI California Chapters are concerned about statements made by Executive Director Mastrup and Commissioners Sutton and Baylis that have suggested that WRC meetings can operate as official Commission meetings. SCI California Chapters need better clarification about how the Commission and WRC will work together, and in particular whether a discussion on the WRC agenda will provide the only opportunity for the public to comment on matters that result in WRC recommendations to the Commission.

The WRC's Membership Should Not Be Increased With an "Alternate" WRC Member

SCI California Chapters are aware of recommendations that the Commission appoint a third "alternate" Commissioner to the WRC. If a third Commissioner was added to the WRC's Membership as an alternate, the WRC would run the risk of turning all of its meetings into unpublicized Commission meetings. Such attempt to bypass the statutory limitations and requirements for Commission meetings could taint the recommendations of the WRC meetings, as well as the decisions made by the Commission at such meetings, or based on the recommendations made at these meetings. SCI strongly recommends that the membership of the WRC remain at two Commissioners only and that the remaining Commissioners resist the temptation of attending WRC meetings in any capacity.

WRC Meeting Must Give the Public a Meaningful Opportunity to Participate

As indicated above, the actions of the WRC up until this date have given the appearance that only certain interest groups have access to the WRC agenda, to offer presentations at WRC meetings and to influence the WRC decision-making processes. These practices must be immediately reversed. At the outset, the WRC must publish notice of its plan to meet and must solicit proposed presentations for the meeting from the public generally, and not just from a limited group. Upon obtaining suggested presentations, the WRC should publish its proposed agenda and give the public adequate opportunity to prepare responses and to submit requests to be heard on agenda items. The WRC should require presentations to be submitted well in advance of the meeting and should share those presentation materials with the public to give the public the opportunity to prepare comments on those presentations.

The only way that the WRC can make meaningful recommendations to the Commission is to make certain that it solicits data from all perspectives. Unless the WRC immediately develops a process to give the public an opportunity to participate in its decision-making, the

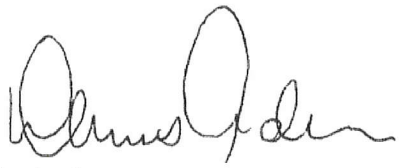
WRC's recommendations will be useless and will make the Commission's decisions vulnerable to challenge.

Participation in the July 28, 2014 WRC Meeting

In the absence of any established procedures for the upcoming WRC meeting, and future meetings, SCI California Chapters expressly reserve all rights to make comments/ presentations at these meetings and at the August 6, 2014 Commission meeting.

Thank you for the opportunity to present these concerns. Should you have any question concerning this letter or concerning the intent of the SCI California Chapters to participate in the July 28, 2014 WRC Meeting and/or the August 6, 2014 Commission meeting, please contact Anna M. Seidman, Director of Litigation, Safari Club International, 202-543-8733 or aseidman@safariclub.org.

Sincerely yours,



Dennis Anderson
Safari Club International, California Legislative Coordinator

cc: Governor Edmund G. Brown
Safari Club International California Chapters
Ms. Kathryn Lynch, Legislative Advocate

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