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FISH AND GAME
COMMISSION

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May 6, 2014

Mr. Charlton Bonham, Director
California Department of Fish and Game
1416 Ninth Street
Sacramento, CA 95814

Mr. Sonke Mastrup, Executive Director
California Fish and Game Commission
1416 Ninth Street
Sacramento, CA 95814

Dear Messrs.' Bonham and Mastrup,

RE: Greater Sage-Grouse preliminary regulations for 2014-15

On behalf of Audubon California and our more than 150,000 members and supporters in California, I write to comment on the Department of Fish and Wildlife's preliminary hunting regulations for 2014-15, specifically with regard to harvest of the Greater Sage-Grouse (*Centrocercus urophasianus*). We base our review on the Department's preliminary recommendations as presented to the Fish and Game Commission at its April 16, 2014 meeting in Ventura.

We note that preliminary harvest recommendations establish a range from 0-50 birds in the Lassen area and 0-100 birds in the Mono population. We respectfully ask for the continued hunting closure of the East Lassen and Central Lassen zones for the Greater Sage-Grouse and for zero harvest in the North and South Mono population for the following reasons:

East and Central Lassen

From Department reports and trained observers in the area it appears that Sage-Grouse populations in the Lassen area suffered significant losses due to the Rush Fire of August 2012. Given the slow rate of habitat restoration in Great Basin sagebrush habitats it appears likely this segment of the Sage-Grouse distribution will experience reduced numbers for years to come. We commend the Department for closing hunting in both East and Central Lassen last year and we urge a continuation of this policy for this year as well hunting in this zone should not be permitted.

As the Department and the Commission are aware, on March 4, 2010 the U.S. Fish and Wildlife Service (FWS) issued two 12-month findings pertinent to California on petitions to list the Greater Sage-Grouse as threatened or endangered under the Endangered Species Act of 1973, as amended (Act). They found that listing the species range wide is warranted, but precluded by higher priority listing actions. This is a clear warning that the species requires careful stewardship and protection to safeguard its survival both in California and throughout its range. In our view any consumptive use of this species in California must be evaluated against a rigorous standard that ensures no harm is done to the recovery of the species. In light of the catastrophic fire in the Lassen region, hunting of the species does not meet such a rigorous standard.

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North and South Mono Basin

We urge the Department to close hunting in this area that is home to the so-called bi-state population of Greater Sage-Grouse, a distinct population segment (DPS) of the species. As the Department and Commission are also aware the FWS proposed on October 28, 2013 to list the bi-state population as threatened under the Act. FWS found that the bi-state population is experiencing adverse impact from all five of the factors that routinely guide the species listing process of the Act:

- (A) The present or threatened destruction, modification, or curtailment of its habitat or range;
- (B) Overutilization for commercial, recreational, scientific, or educational purposes;
- (C) Disease or predation;
- (D) The inadequacy of existing regulatory mechanisms; or
- (E) Other natural or manmade factors affecting its continued existence.

Given the ongoing evaluation of the bi-state population for possible listing we again believe that any consumptive use of this species in California must be evaluated against a rigorous standard that ensures no harm is done to the recovery of the species. In our view establishing a harvest limit other than zero does not meet that standard. We further note that this population is not hunting in the state of Nevada, which shares management responsibility for the bi-state population in that state.

We look forward to working with the Department and the Commission on Sage-Grouse conservation. Thank you for your consideration of our views.

Sincerely,



Michael Lynes
Director of Public Policy