

Appendix A. Summary of Primary Considerations Raised in Support of or Opposition to the Amendments to Section 300, T14, CCR.

Committer Name, Date, Format	Comment	Response	
Responses to Comments received during the Public Notice period March 28, 2017 – June 22, 2017			
1	<p>Petition Email circulated by the Center for Biological Diversity (CBD)</p> <p>6/18/17</p>	<p>There were 4225 emails with the same content as follows:</p> <p>Stop Sage Grouse Hunting in California</p> <p>A. I'm writing to urge you to end sage grouse hunting in California. Greater sage grouse populations in California have declined dramatically from historic levels due to loss and degradation of habitat. And this year's harsh winter conditions may reduce populations even further.</p> <p>B. While hunting is not the greatest threat faced by this bird, any deaths caused by hunting may further jeopardize the few small, isolated sage grouse populations still clinging to survival in California.</p> <p>C. That's why I'm urging the California Fish and Game Commission to end hunting of sage grouse and focus instead on providing additional protections for this iconic sagebrush species.</p> <p>(Note: Comments adding anything substantive to the petition are indicated as Comment D)</p>	<p>1A. Opposition to sage grouse hunting is noted. Sage grouse hunting has been managed in recent years with permit recommendations based on conservative estimates to reduce any likelihood of additive mortality. The Department is not recommending any permits for the current year in order to avoid any potential additive mortality among leks, given the decline in reported lek attendance in 2017.</p> <p>1B. The Department has recognized the vulnerability of small, peripheral populations by reducing the hunt zone area in South Mono to include only the most healthy and well-connected populations. The two hunt zones in Mono County only encompass the two main populations and do not include any of the outside populations about which the USFWS expressed concerns regarding long-term population persistence.</p> <p>1C. The Commission did not adopt a "no hunting" regulation, but did adopt a zero quota for the next season which means there will not be any sage grouse hunting for this coming season.</p> <p>(Note: Responses to any added substantive comment to the petition are indicated as Response D)</p>
2A	<p>CBD</p> <p>Lisa T. Belenky, Senior Attorney</p> <p>Letter via Email 4/13/17</p>	<p>A. The Initial Statement of Reasons for Regulatory Action ("ISOR") recommends adopting a range for permits in each zone and states: "For the 2017-2018 season, the Department will present the Commission a recommendation for permits based on the spring 2017 lek counts." (ISOR at 2.) Those lek counts are not yet available and therefore cannot inform the discussion at the April meeting. Moreover, the Department has not provided the Commission or the public with any information on the number of permits actually issued in 2016-2017 nor information on the number of birds killed and their demographics; this information is also needed to inform public comment and discussion.</p>	<p>2AA. The Department presented tag and harvest totals for the 2016 sage grouse hunt season at the Fish and Game Commission discussion hearing for Upland Game Bird Regulations in Van Nuys California, April 26, 2017. Harvest totals for 2012-2015 were presented during previous years Fish and Game Commission rulemaking meetings.</p>

Appendix A. Summary of Primary Considerations Raised in Support of or Opposition to the Amendments to Section 300, T14, CCR.

		<p>B. While the Center recognizes that the Department's 2017-2018 proposal reduces the high-end range for the number of permits that could be issued in each of the 4 zones from last year's proposal, we continue to object to these high-end range and urge the Commission to adopt zero permits in all zones.</p>	<p>2AB The Department uses a range of permits, e.g. [0-25], simply as a place holder while population surveys are being conducted so that current year data can be used to develop final permit recommendations to the Commission. The Department recognized during consideration of last year's (2016) quotas that the range was much higher than the number of permits that had been issued in recent years. Therefore, the Department responded that, in future years, it would develop a range based on more recent population trends. To that end, the ranges for 2017 (as set forth in the ISOR and proposed Regulatory Text) were reduced 50% or more. The recommendation for this year was set at zero (and adopted) in all zones.</p>
		<p>C. Although hunting has not been identified as the <i>primary</i> reason for the decline of the sage grouse in California, it remains a factor that undermines conservation of this species. As the Department itself admits: "Concerns about the potential effects of hunting to sage grouse through additive mortality have been expressed in the scientific literature, including studies from California." (ISOR at 1.) Because the remaining populations of the sage grouse in California are generally small and isolated, any additive mortality from hunting can put them at risk of further decline and extinction from stochastic events along with other threats such as increased development within sensitive habitat.</p>	<p>See Response 1B</p>
<p>2B</p>	<p>CBD Lisa T. Belenky, Senior Attorney Letter via Email 6/16/17</p>	<p>A. The cause of downward trends in the current year lek counts need to be further examined. Only additional surveys over a period of years will be able to assess whether access truly confounded the data for the North Mono zone or whether the spring 2017 lek counts accurately depict this part of the population and fit with the unfortunate declining trend.</p>	<p>2BA. The Department agrees that properly assessing the cause of downward trends in observed lek attendance during 2017 will require additional surveys in subsequent years and continued monitoring.</p>
		<p>B. The Center supports the precautionary principal and the Department's recommendation that the Commission eliminate the permit ranges and adopt a zero permit limit for all sage grouse populations in all zones in California for the 2017-2018 season.</p>	<p>See Response 1C</p>

Appendix A. Summary of Primary Considerations Raised in Support of or Opposition to the Amendments to Section 300, T14, CCR.

3	Michael McClelland 4/23/17	A. I cannot think of a single good scientific, cultural, or ethical reason why we need to kill animals that are comparatively rare compared to their historical abundance.	See Response 1A
		B. There could be an exception for killing birds under threat if someone was frequently hungry, which was the traditional reason for hunting, and for a native American hunt using pre-Columbian weapons. Those licenses would be issued free instead of being sold off for state revenue.	3B: Comment outside the scope of the rulemaking proposals.
4	Sue Stone 4/22/17	A. Please don't allow ANY hunting of sage grouse. With the current environmental destructionists in WA opening up more federal lands to oil and gas, these birds may not survive!	See Response 1A.
5	Erik Gottlieb 4/21/17	A. Please enable legislation to stop the sale of permits for sage grouse hunting in California.	5A. The State Statutes classify sage grouse as upland game birds (FGC Section 3683) and as such are designated as a game species.
6	Lori Paul 4/21/17	See Comment 1A-1C	See Response 1A-1C
		D. Eliminate hunting of Greater Sage Grouse. Hunting of sage grouse is unwise at this time as individual birds contribute genetic potential to the recovery of the species. Individual birds may contribute to expansion of currently isolated populations.	6D. The Department agrees that individual birds contribute genetic potential to the recovery of the species and is actively engaged in a translocation project to move individuals and broods from Mono County to Parker Meadows, owned by the Los Angeles Department of Water and Power. Genetic data suggests this population is inbred and therefore outbreeding with additional grouse is expected to improve its viability. The Department is recommending no sage grouse hunt permits in the North Mono Zone for 2017, in part, due to the additional stress that these translocations place on the source population.
7	Stacy Martin (CBD Petition Email) 4/21/17	See Comment 1A-1C	See Response 1A-1C
		D. In light of ever-uncertain shifts to weather and environment - there is no longer a way of knowing how many to kill constitutes prudent culling. California is not immune to the effects of global warming - and protecting all indigenous species is key to maintaining healthy natural diversity.	See Response 1A.

Appendix A. Summary of Primary Considerations Raised in Support of or Opposition to the Amendments to Section 300, T14, CCR.

8	Diana M Marmorstein 4/24/17	A. Opposed to permitting the killing of any sage grouse. The sage grouse population has been adversely affected by hunters, ranchers, wildfires and drought. The wildfires and droughts that California experienced over the last several years are likely due to climate change, which is worsening. With the current federal government, there is little chance of the U.S. working to mitigate climate change, so we can expect that these birds will die terrible deaths in larger numbers due to wildfires and future droughts.	8A. Sage grouse are only hunted in the four zones with the healthiest and most well-connected populations. The two hunt zones in Mono County only encompass the two main populations and do not include any of the outside populations about which the USFWS expressed concerns regarding long-term population persistence. The two Lassen zones did decline in 2013-2014 following the Rush Fire and have recovered more than expected with population growth in both 2015 and 2016 prior to observed declines in 2017. Neither Lassen zone has been hunted since 2012. The Department integrates the body of science on the effects of sage grouse hunting by implementing one of the most conservative and controlled approaches in the species' range.
9	Phil Reioux 4/21/17	A. Preserve sage grouse hunting. Hunters fund habitat and conservation. Loss of hunting will negatively impact sage grouse. The people that do the most good and work for that species will feel disenfranchised and lose their drive for that species if you take away their right to hunt.	See Response 1C
10	Byron Fitzpatrick 4/21/17	A. Keep sage grouse hunting. Sage grouse are thriving in many places in California and this year's abundant water will likely produce a bountiful hatch.	See Response 1C
11	Daniel B. Epperson 4/21/17	A. Keep sage grouse hunting. Sage grouse are thriving in many places in California and this year's abundant water will likely produce a bountiful hatch.	See Response 1C
12	Melissa Bergemann 4/21/17	A. Stop sage grouse hunting. Any deaths will jeopardize the few sage grouse populations clinging to survival.	See Response 1A.
13	Arnold Martelli (CBD Petition Email) 4/21/17	See Comment 1A & 1C	See Response 1A & 1C
		B. The greater sage grouse population in California have declined catastrophically from its historic level due to irresponsible overkill in the hunting community.	See Response 1A
14	V. Calkins (CBD Petition Email) 4/23/17	See Comment 1A – 1C	See Response 1A – 1C
		D. Until the population of this species has rebounded to a stronger level, it should be protected.	See Response 1A.

Appendix A. Summary of Primary Considerations Raised in Support of or Opposition to the Amendments to Section 300, T14, CCR.

15	Lesley Hunt (CBD Petition Email) 4/21/17	See Comment 1A – 1C	See Response 1A – 1C
		D. After the species recovers, then perhaps you can consider allowing hunting. But the correct order is, increase the population before allowing any members to be killed by humans.	See Response 1C
16	Michael McLaughlin (CBD Petition Email) 4/21/17	See Comment 1A – 1C	See Response 1A – 1C
		D. End sage grouse hunting. Massively increasing human entry into these bushland areas by ORVs, increased fencing of public lands - in this case by BLM for financial-loss grazing - and just increased population and technological toys and such things as increased air travel in the rural airstrips near another lek. We CANNOT keep taking away the habitat allelic variation, and population of Sage Grouse. We must cut back our intrusion gunfire, and other environmental destruction increasing pressures on these and other species. When animal populations are below certain levels, their genetic variation suffers from any mortality exceeding the natural mortality of the aged, ill, injured, and those discovered unwary by native predators. Hunting therefore adds to the vulnerability of this species to extinction, through removing the well-adapted, and through preventing their more useful traits from being passed on.	See Response 6D
17	Carla Dimondstein (CBD Petition Email) 4/21/17	See Comment 1A – 1C	See Response 1A – 1C
		D. End sage grouse hunting in California. CF&W continues to promote the killing of species, who have no voice, eviscerating their populations. The CF&W has a retarded view of their dominion over the creatures who have no voice that we share this place with. It's small-minded and outrageous that F&W would allow this bird to be hunted when so many other factors stress their capacity to survive. The basis upon which the CF & W views its task is so discouraging. It should be promoting and providing habitat and protections for all animals.	17D. Fish and Game Code Section 1801(e) states that it is the policy of the state “to maintain diversified recreational uses of wildlife, including the sport of hunting, as proper uses of certain designated species of wildlife subject to regulations consistent with the maintenance of healthy, viable wildlife resources, the public safety, and a quality outdoor experience.” The Fish and Game Commission and the Department, endeavor to balance these diverse interests through the regulatory process.

Appendix A. Summary of Primary Considerations Raised in Support of or Opposition to the Amendments to Section 300, T14, CCR.

18	Gary Milano 4/21/17	A. There is absolutely no biologically sound reason to keep killing grouse with the gun so a few hunters can have the outdated experience. Hunting while a minor contributor to grouse mortality is outdated and just another adverse event for the populations to cope with.	See Response 1A.
		See Comment 1B	See Response 1B
19	Patrice Erickson (CBD Petition Email) 4/21/17	See Comment 1A – 1C	See Response 1A – 1C
		D. This fine bird was only recently taken off the endangered list. It needs many more years before the hunters are allowed to go at them again, let them rebound to some level that isn't precarious. Please give them a chance and at least a few more years of safety before they are yet again hunted to near extinction.	See Response 1A
20	Jacquelyn Griffith (CBD Petition Email) 4/21/17	See Comment 1A - 1C	See Response 1A - 1C
		D. End sage grouse hunting in California. Hunting these beautiful, fascinating, birds is disruptive to their lives and mating...it traumatizes and splits up little groups when guns fire and these birds do not need further disruption of their diminished population.	See Response 1C
21	Arnold Martelli (CBD Petition Email) 4/21/17	See Comment 1A - 1C	See Response 1A - 1C
		D. I hope the California Fish and Game Commission to end hunting of sage grouse and focus, instead, on providing additional protections to preserve this this iconic sagebrush species. It is your regulatory responsibility to the State of California.	See Response 17D

Appendix A. Summary of Primary Considerations Raised in Support of or Opposition to the Amendments to Section 300, T14, CCR.

23	Ruth Van Sciver (CBD Petition Email) 4/21/17	See Comment 1A - 1C	See Response 1A - 1C
		D. I'm outraged! I've never even seen one of these beautiful creatures and you want to kill them all? Hunting is absurd!!! There are too many people on this planet to hunt. We will eventually wipe out everything!!! Have you read the 6th extinction?	See Response 1A.
24	Neal Maillet (CBD Petition Email) 4/21/17	See Comment 1A - 1C	See Response 1A - 1C
		D. This bird is in peril, and winter conditions may have added to the pressure in untold ways. So many factors are reducing bird populations, can't we remove the most obvious factor, i.e., killing them outright?	See Response 1A.
25	Monica Stigliano-Stormo (CBD Petition Email) 4/21/17	See Comment 1A - 1C	See Response 1A - 1C
		D. One threat we can control is hunting. The sage grouse faces an uncertain future. Please do not allow hunting - ANY hunting, of this magnificent bird. It is a symbol of the American west, and California should be a leader in protecting the sage grouse.	See Response 1A.
26	Lawrence Thompson (CBD Petition Email) 4/21/17	See Comment 1A - 1C	See Response 1A - 1C
		D. Why can't people just photograph them, not shoot them with a gun?	See Response 1A.
27	Genevieve DeGuzman (CBD Petition Email) 4/21/17	Comment 1A - 1C	See Response 1A - 1C
		D. These birds are part of the natural bounty of California. Please protect them so that we can retain the natural biodiversity of our wild areas.	See Response 1A.
28	Steve Lustgarden (CBD Petition Email) 4/21/17	Comment 1A-1C	See Response 1A - 1C
		D. These majestic birds are in steep decline and deserve the highest degree of protection.	See Response 1A.

Appendix A. Summary of Primary Considerations Raised in Support of or Opposition to the Amendments to Section 300, T14, CCR.

29	Catherine Vidal (CBD Petition Email) 4/21/17	Comment 1A-1C	See Response 1A - 1C
		D. We are losing environmental protection for a balance in nature, as well as, preservation.	See Response 1A.
30	Melissa Bergemann (CBD Petition Email) 4/21/17	See Comment 1A-1C	See Response 1A - 1C
		D. Any deaths will jeopardize the few sage grouse populations clinging to survival.	See Response 1A.
31	Mark Feldman (CBD Petition Email) 4/21/17	See Comment 1A-1C	See Response 1A - 1C
		D. Strongly ask you to immediately stop sage grouse hunting in ca	See Response 1A.
32	Al Sears (CBD Petition Email) 4/21/17	See Comment 1A - 1C	See Response 1A - 1C
		D. Forward thinking is required now to prevent the loss of yet another species in the future. If not, we will lament our lack of action when we still had the opportunity.	See Response 1A.
33-55	Commenters used the CBD petition but changed the subject line.	Comment 1A - 1C	See Response 1A - 1C

Appendix A. Summary of Primary Considerations Raised in Support of or Opposition to the Amendments to Section 300, T14, CCR.

Responses to Oral Comments received during the Comment Period.			
56	Kim Richards Oral 4/26/17	A. Interested to learn more about the status and progress of the Department's efforts to transplant sage-grouse and improve sage-grouse habitat.	33A. The Department gave an update on translocation efforts at the June 21, 2017 Fish and Game Commission meeting.
		B. Hope that there would not be an increase in the number of sage-grouse permits this year.	See Response 1C
57	J.P. Rose (CBD) Oral 4/26/17	A. Concerned that a discussion of regulations is pre-mature given that lek-count data is not yet available.	34A. The Department presented and discussed the current year results of lek-counts for sage-grouse and made a recommendation for 0 permits to be issued at the June 21, 2017 Fish and Game Commission meeting.
		B. Nothing in the ISOR shows that the Department considered the high range impact (125 permits) or the cumulative impact to either the Bi-State or statewide sage-grouse population.	See Response 2AB
		C. Concerned that while hunting is not a primary factor responsible for declines, it could be an additive mortality factor and the precautionary principal dictates that the Department should issue 0 permits for the 2017-18 season.	See Response 1A
58	Mark Hennelly California Waterfowl Association Oral 4/26/17	A. Sage grouse declines are a habitat issue, not a hunting issue. Revenues from permits support conservation for this species. Expressed hope that some permits would be issued.	See Response 1C
59	Bill Gaines National Wild Turkey Federation Oral 4/26/17	A. The Department has taken an ultra-conservative approach to sage-grouse management. Declines are a result of habitat not hunting. North Mono populations are at record levels.	See Response 1C

Appendix A. Summary of Primary Considerations Raised in Support of or Opposition to the Amendments to Section 300, T14, CCR.

60	Jeff Miller (CBD) Oral 6/21/17	See Comment 1A	See Response 1A
		B. Supports Department recommendation to issue 0 permits in all four hunt zones for 2017.	See Response 1C
		C. Expressed hope that the Department would collect at least a couple of years of (lek) data in the North Mono Hunt Zone to see if the population has declined as much as the other zones before resuming hunting and to see if a wet year helps revive populations.	See Response 2BA
		D. Interested to learn more about the numbers and demographics of birds shot in North Mono during the 2012-2016 hunt seasons.	See Response 2AA