

Summary of Comments and Responses on Section 353 (Methods Authorized for Taking Big Game) & Section 475 (Methods of Take for Nongame Birds and Nongame Mammals)

Description of Proposed Action by Public:

Opposed to the regulation change regarding lead ammunition due to incomplete and speculative science and because the cost of nonlead ammunition would price hunters out of the sport. Supports voluntary measures, such as burial of gut piles in condor range.

Proposal Source:

James Dahl, Irvine (Letter dated January October 9, 2007) - #1

Recommendation:

Reject

Analysis:

Assembly Bill 821 (Ridley-Tree Condor Preservation Act), requiring the use of nonlead ammunition within certain areas inhabited by the California condor, was passed by the State Legislature and signed into law by Governor Schwarzenegger in September, 2007. The Department rejects this recommendation because it conflicts with current state law.

Description of Proposed Action by Public:

Requests information regarding what impact the exemption of .22 caliber cartridges would have on the potential lead poisoning of California condors.

Proposal Source:

Philip Glaser, Laguna Niguel (Letter dated October 12, 2007) - #2

Recommendation:

None needed; comment is a request for information not a recommendation for regulation change.

Analysis:

Although the primary food sources of condors consist of various big-game species and domestic livestock, several instances have been recently documented of condors feeding on species such as ground squirrels. Since the vast majority of hunters that shoot nongame mammals do so with .22 or smaller calibers (with carcasses commonly left in the field), the potential for lead poisoning due to the exemption of these calibers would continue to exist.

Description of Proposed Action by Public:

Recommends the Commission adopt a standard for non-lead projectiles as containing less than 0.5% lead by weight and begin a process, to be completed over the next 12-18 months, to study the impacts of trace lead on condors and other wildlife.

Proposal Source:

Glenn Olson, Audubon California (Letter dated October 29, 2007) - #3

Recommendation:

Accept with modification

Analysis:

The Department recognizes that due to the inherent trace impurities (lead) present in the various metals used to produce projectiles it would be impossible, using current technologies and manufacturing processes, to achieve a standard of 100% lead free projectiles. Because of the amount of lead required to be consumed to result in lead poisoning in a bird of the condors size, ammunition manufacturer's and a leading avian toxicologist have recommended a standard of $\leq 1\%$ lead by weight to certify a projectile as being lead free. The Department believes the recommended standard of $< 0.5\%$ lead by weight is overly restrictive and may result in no suitable ammunition available for use by big-game hunters in the non-lead zone, and would not result in any significant reduction in lead poisoning due to the amount required for consumption to result in lead poisoning at the $\leq 1\%$ standard.

Description of Proposed Action by Public:

Requests an exemption on the requirement for nonlead projectiles in .22 and smaller calibers.

Proposal Source:

Jerry Sepulveda, location unknown (Email date October 30, 2007) - #4

Recommendation:

Reject.

Analysis:

This is the Department's recommendation.

Description of Proposed Action by Public:

Recommends a standard of $\leq 1\%$ lead by weight to certify a projectile as nonlead.

Proposal Source:

Michael Fry, PhD, American Bird Conservancy (Letter dated November 1, 2007) - #5

Recommendation:

Accept

Analysis:

The Department recognizes that due to the inherent trace impurities (lead) present in the various metals used to produce projectiles it would be impossible, using current technologies and manufacturing processes, to achieve a standard of 100% lead free projectiles. Because of this and because of the amount of lead required to be consumed to result in lead poisoning in a bird of the condors size, the Department supports the recommendation for a standard of $\leq 1\%$ lead by weight to certify a projectile as being lead free.

Description of Proposed Action by Public:

Recommends that current realistic price estimates be provided in the documentation associated with this proposed rule change.

Proposal Source:

Robert Hendricks, San Carlos (Email dated November 7, 2007) - #6

Recommendation:

Accept

Analysis:

Although every effort has been made to do so in the documentation to date, the passage of AB 821 into law has effectively made the cost of nonlead ammunition a moot point. The Department will continue to provide the most current and realistic price estimates when requested by the Commission to support any future modifications to these sections.

Description of Proposed Action by Public:

Recommends a standard of $\leq 1\%$ lead by weight to certify a projectile as nonlead; recommends that option 3b in the Final Environmental Document regarding Methods of Take for Big Game, Nongame Birds, and Nongame Mammals regarding the geographic scope of the lead ban (all of South A zone and D7, D8, D9) with no exemption made for wildcat cartridges. Supports DFG recommendations.

Proposal Source:

Kelly Sorenson, Ventana Wildlife Society (Letter dated November 9, 2007) - #7

Kelly Sorenson, Ventana Wildlife Society (Testimony December 7, 2007)

Recommendation:

Accept with modification

Analysis:

The Department recognizes that due to the inherent trace impurities (lead) present in the various metals used to produce projectiles it would be impossible, using current technologies and manufacturing processes, to achieve a standard of 100% lead free projectiles. Because of this and because of the amount of lead required to be consumed to result in lead poisoning in a bird of the condors size, the Department supports the recommendation for a standard of $\leq 1\%$ lead by weight to certify a projectile as being lead free.

Current telemetry data and the predicted rate of expansion of condor range provided by condor researchers does not support increasing the area of the ban beyond that proposed in Option A (current condor range). The Department believes implementation of this recommendation will unnecessarily restrict hunter opportunity (due to current availability of and expected demand for nonlead projectiles resulting from an increase in the geographic scope of the nonlead area) while not providing any measurable benefit to the condor.

The Department agrees that an exemption for wildcat cartridges would not accomplish the legislative intent of reducing the amount of lead due to hunting activities potentially available for consumption by the California condor.

Description of Proposed Action by Public:

Recommends written exemptions for the use of birdshot and non-manufactured calibers (wildcat) be included in the regulation change. Concerned about enforcement of lead ban.

Proposal Source:

Dick Dasmann, Arroyo Grande Sportsmen's Club Inc. (Letter dated November 19, 2007) - #8, #11

Dick Dasmann, Arroyo Grande Sportsmen's Club Inc. (Testimony December 7, 2007)

Recommendation:

Reject

Analysis:

The Department rejects this recommendation because its implementation would not accomplish the legislative intent of reducing the amount of lead due to hunting activities potentially available for consumption by the California condor.

Description of Proposed Action by Public:

Opposed to the regulation change regarding lead ammunition for a variety of reasons including a lack of scientific evidence, potential reduction in hunter numbers and resulting fiscal consequences to the Department, and risk of potential litigation.

Proposal Source:

Paul Osuna, San Diego (Email dated November 25, 2007) - #9

Recommendation:

Reject

Analysis:

Assembly Bill 821 (Ridley-Tree Condor Preservation Act), requiring the use of nonlead ammunition within certain areas inhabited by the California condor, was passed by the State Legislature and signed into law by Governor Schwarzenegger in September, 2007. The Department rejects this recommendation because it conflicts with current state law.

Description of Proposed Action by Public:

Recommends .22 and smaller calibers be prohibited for use under Sections 353 & 475 as well as in depredation situations within the range of the California condor.

Proposal Source:

Edward Schulze, Novato (Letter dated November 23, 2007) - #10

Edward Schulze, Novato (Public testimony October 12, 2007)

Recommendation:

Reject

Analysis:

The Department recognizes that due to the inherent trace impurities (lead) present in the various metals used to produce projectiles it would be impossible, using current technologies and manufacturing processes, to achieve a standard of 100% lead free projectiles. Because of this and because of the amount of lead required to be consumed to result in lead poisoning in a bird of the condors size, the Department supports the recommendation for a standard of $\leq 1\%$ lead by weight to certify a projectile as being lead free.

The Department rejects the recommendation regarding depredation uses, as these sections (Sections 400-402, T14, CCR) are not included within the scope of the regulation change proposals currently before the Commission. Additionally, the Department's current depredation policy within current condor range is to require the use of nonlead ammunition for depredation issues. No prohibition regarding .22 or smaller calibers is required under Section 353 as this section currently requires the use of centerfire cartridges to take big game species.

Description of Proposed Action by Public:

Recommends not implementing the lead ban due to problems associated with primitive weapons; Recommends Department personnel evaluate all current and proposed State Park properties relative to a condor restoration project and report the findings to the Commission and Director of the Resources Agency.

Proposal Source:

Dennis Fox, Bakersfield (Letter dated November 29, 2007) - #12

Dennis Fox, Bakersfield (Testimony October 12, 2007)

Recommendation:

Reject

Analysis:

Assembly Bill 821 (Ridley-Tree Condor Preservation Act), requiring the use of nonlead ammunition within certain areas inhabited by the California condor, was passed by the State Legislature and signed into law by Governor Schwarzenegger in September, 2007. The Department rejects this recommendation because it conflicts with current state law. The Department also rejects the recommendation regarding the evaluation of all current and proposed State Park properties relative to the condor restoration project because it is beyond the purview of the current regulation change proposal.

Description of Proposed Action by Public:

Recommends, at minimum, the adoption of Option B (historic condor range) of the Final Environmental Document regarding sections 353 & 475 for both sections.

Proposal Source:

Johanna Dawes, Los Angeles (Letter dated November 27, 2007) - #13

Recommendation:

Reject

Analysis:

Current telemetry data and the predicted rate of expansion of condor range provided by condor researchers does not support increasing the area of the ban beyond that proposed in Option A (current condor range). The Department believes implementation of this recommendation will unnecessarily restrict hunter opportunity (due to current availability of and expected demand for nonlead projectiles resulting from an increase in the geographic scope of the nonlead area) while not providing any measurable benefit to the condor.

Description of Proposed Action by Public:

Letter provides an update of the authors efforts to determine a scientifically precise level of allowable lead in ammunition deemed non-toxic.

Proposal Source:

Michael Fry, PhD, American Bird Conservancy (Letter dated December 4, 2007) - #14

Recommendation:

No recommendation necessary

Analysis:

No analysis is necessary as the letter is to provide information only and contains no further recommendations beyond that provided in previous letter dated November 1, 2007.

Description of Proposed Action by Public:

Recommends the Commission take no other action than to implement AB821 before the Department has the opportunity to address scientific issues and that the Commission's definition of "nonlead ammunition" allow trace amounts of lead.

Proposal Source:

Dennis Anderson, Safari Club International (Letter dated November 30, 2007) - #15

Recommendation:

Accept with modification

Analysis:

The California State Legislature has granted wide regulatory authority to the Fish and Game Commission to protect, maintain, and enhance California's wildlife resources for the benefit of the entire population of the State. Despite the author's assertions to the contrary, it is obvious that the legislative intent of AB821 is to remove lead projectiles as a source of potential lead poisoning within the range of the California condor. It is the Commission responsibility to interpret that legislative intent based on evidence and data provided from a variety of sources, including the Department. Therefore, the Department rejects this recommendation because it ignores the legislative intent of AB 821, unnecessarily restricts the Commissions authority, and is not supported by data and analysis provided to date.

The Department recognizes that due to the inherent trace impurities (lead) present in the various metals used to produce projectiles it would be impossible, using current technologies and manufacturing processes, to achieve a standard of 100% lead free projectiles. Because of this and because of the amount of lead required to be consumed to result in lead poisoning in a bird of the condors size, the Department supports the recommendation for a standard of $\leq 1\%$ lead by weight to certify a projectile as being lead free.

Description of Proposed Action by Public:

Author provides background information regarding his qualifications to comment on this issue and provides several alternative causes of lead poisoning in condors other than lead projectiles.

Proposal Source:

Dexter Haight, Ramona (Letter dated October 10, 2007 and provided by Anthony Canales at October 12, 2007 meeting) - #16

Recommendation:

No recommendation necessary

Analysis:

No analysis necessary; letter provided for informational purposes only and does not make any recommendations relative to the regulatory change proposal under consideration.

Description of Proposed Action by Public:

Recommends not implementing the regulation change due to deficiencies in studies and data presented to support it and provides information regarding an alternative source of lead poisoning.

Proposal Source:

Anthony Canales, Granada Hills (Public testimony provided at 10/12/07 meeting) - #17

Recommendation:

Reject

Analysis:

Assembly Bill 821 (Ridley-Tree Condor Preservation Act), requiring the use of nonlead ammunition within certain areas inhabited by the California condor, was passed by the State Legislature and signed into law by Governor Schwarzenegger in September, 2007. The Department rejects this recommendation because it conflicts with current state law.

Description of Proposed Action by Public:

Supports implementation of AB 821 and provided evidence of the successful performance of nonlead projectiles for taking big game species.

Proposal Source:

Henry Coletto, California Deer Association (Public testimony provided at 10/12/07 meeting) - #18

Recommendation:

Accept

Analysis:

This is the Department's recommendation.

Description of Proposed Action by Public:

Recommends not approving a regulation change proposal regarding a lead ban for a variety of reasons but if it is enacted, requests inclusion of alternative methods for hunters to interrupt lead pathways besides the lead projectile ban. Recommends more education and outreach.

Proposal Source:

Walter Mansell, California Rifle & Pistol Association (Letter dated October 12, 2007) - #18
Walter Mansell, California Rifle & Pistol Association (Testimony October 12, 2007)

Recommendation:

Reject

Analysis:

Assembly Bill 821 (Ridley-Tree Condor Preservation Act), requiring the use of nonlead ammunition within certain areas inhabited by the California condor, was passed by the State Legislature and signed into law by Governor Schwarzenegger in September, 2007. The Department rejects this recommendation because it conflicts with current state law.

Description of Proposed Action by Public:

Recommends an exemption be granted for sidelock muzzleloading rifles; expressed concern about increased fire danger due to switch from lead to other metals; provided information provided regarding prices of lead v. nonlead ammunition

Proposal Source:

Dennis Fox, Bakersfield (Provided at October 12, 2007 meeting) - #20

Recommendation:

Reject

Analysis:

Assembly Bill 821 (Ridley-Tree Condor Preservation Act), requiring the use of nonlead ammunition within certain areas inhabited by the California condor, was passed by the State Legislature and signed into law by Governor Schwarzenegger in September, 2007. The Department rejects this recommendation regarding an exemption for sidelock muzzleloading rifles because it conflicts with current state law.

Description of Proposed Action by Public:

Recommends a maximum allowable lead content to be included in the Commission's standard for nonlead projectiles.

Proposal Source:

J.W. Morris, Jr., Oakland (Letter dated September 18, 2007) - #21

Recommendation:

Accept with modification

Analysis:

The Department recognizes that due to the inherent trace impurities (lead) present in the various metals used to produce projectiles it would be impossible, using current technologies and manufacturing processes, to achieve a standard of 100% lead free projectiles. Because of this and because of the amount of lead required to be consumed to result in lead poisoning in a bird of the condors size, the Department supports the recommendation for a standard of $\leq 1\%$ lead by weight to certify a projectile as being lead free.

Description of Proposed Action by Public:

Recommends the Commission establish 0.1% as the maximum allowable lead concentration in projectiles certified as nonlead. Discussed monitoring of condor by scientists.

Proposal Source:

Robert Risebrough, California Condor Recovery Team (Letter dated December 6, 2007) - #22
Robert Risebrough, California Condor Recovery Team (Testimony December 7, 2007)

Recommendation:

Accept with modification

Analysis:

The Department recognizes that due to the inherent trace impurities (lead) present in the various metals used to produce projectiles it would be impossible, using current technologies and manufacturing processes, to achieve a standard of 100% lead free projectiles. Because of this and because of the amount of lead required to be consumed to result in lead poisoning in a bird of the condors size, the Department supports the recommendation for a standard of $\leq 1\%$ lead by weight to certify a projectile as being lead free.

Although the recommendation falls within the range provided to the Commission, the Department does not support a <0.1 lead standard because it is overly restrictive and may result

in no suitable ammunition available for use by big-game hunters in the non-lead zone, and would not result in any significant reduction in lead poisoning as identified by a leading avian toxicologist.

Description of Proposed Action by Public:

Recommends not changing the methods of take sections because of apparent conflicts between law (AB 821) and the language of the regulatory change proposal under consideration to implement that law.

Proposal Source:

Anthony Canales, Granada Hills (Public testimony provided at 12/07/07 meeting) - #23
Anthony Canales, Granada Hills (Public testimony provided at 10/12/07 meeting)

Recommendation:

Reject

Analysis:

The California State Legislature has granted wide regulatory authority to the Fish and Game Commission to protect, maintain, and enhance California's wildlife resources for the benefit of the entire population of the State. Despite the supposed "inconsistencies" identified by the author, it is readily apparent that the legislative intent of AB 821 is to remove lead projectiles as a source of potential lead poisoning within the range of the California condor. The Department rejects this recommendation because it does not recognize the Commission's authority to enact regulations based on legislative intent, and would not accomplish the legislations obvious intent.

Description of Proposed Action by Public:

Recommends nonlead ammunition be required for depredation purposes within the condor range and that the .22 caliber exemption be modified to include language to allow for future reevaluation and possible inclusion when appropriate alternatives become available.

Proposal Source:

Eric Brunnemann, Pinnacles National Monument (Letter dated December 5, 2007) - #24

Recommendation:

Reject

Analysis:

The Department rejects the recommendation regarding depredation uses, as these sections (Sections 400-402, T14, CCR) are not included within the scope of the regulation change proposals currently before the Commission. Additionally, the Department's current depredation

policy within current condor range is to require the use of nonlead ammunition for depredation issues.

The Department rejects the recommendation regarding adding language to allow for future consideration of including .22 caliber ammunition within the lead ban when alternatives become available. The regulation can be modified at a future date (without the addition of any language to allow that at this time) when sufficient data is collected and proper analysis indicates the change is necessary to benefit the condor and would not be overly restrictive on hunter opportunity.

Description of Proposed Action by Public:

Recommends the Commission limit the lead ban area to Option A and identify funding opportunities to off-set additional costs that may be incurred by livestock owners.

Proposal Source:

Noelle Cremers, California Farm Bureau Federation (Letter dated December 7, 2007) - #25
Noelle Cremers, California Farm Bureau Federation (Testimony December 7, 2007)

Recommendation:

Accept with modification

Analysis:

Due to current telemetry information and the predicted rate of condor range expansion in the future, the Department's recommendation regarding the geographic area of the lead projectile prohibition is option A of the final environmental document.

The Department rejects the recommendation regarding funding opportunities, as the current law does not require them to be provided unless sufficient state funds currently exist to provide them. At this time, the Department's budget does not include any additional funds to provide a "rebate" program to offset increased costs associated with nonlead ammunition; since no such "opportunities" exist they can not be identified.

Description of Proposed Action by Public:

Recommends the Commission approve the regulation to require the use of nonlead ammunition for all hunting, immediately within the range of the California condor, and subsequently statewide as well.

Proposal Source:

James M. Birkelund, Natural Resources Defense Council (Letter dated December 7, 2007) - #26
James M. Birkelund, Natural Resources Defense Council (Testimony December 7, 2007)

Recommendation:

Accept with modification

Analysis:

Regulations regarding the hunting of upland game are not open for modification at this time. A statewide ban on lead projectiles was considered and discussed in the Final Environmental Document for Methods of Take for big game species as well as for nongame bird and mammal species, but was not the Department's recommendation because it would be overly restrictive and unnecessary to protect the California condor at this time. Monitoring of health and lead levels in raptors in the preferred alternative area (alternative 3) would provide information as to the appropriateness or need for statewide action in the future.

Description of Proposed Action by Public:

Provides chemical analysis of metals used to produce Nosler E-Tipd bullets.

Proposal Source:

Mike Lake, Nosler Inc. (Fax dated November 28, 2007) - #27

Recommendation:

No recommendation necessary

Analysis:

No analysis necessary; item was provided for informational purposes.

Description of Proposed Action by Public:

Recommends the species, geographical area, and methods of take outlined in AB821 stand as they are; recommends certification of Barnes solid copper and Nosler E-Tipped bullets; recommends the regulation make no distinction between factory ammunition and handloads.

Proposal Source:

Walter Mansell, California Rifle & Pistol Association (Letter dated December 5, 2007) - #28

Recommendation:

Accept with modification

Analysis:

The California State Legislature has granted wide regulatory authority to the Fish and Game Commission to protect, maintain, and enhance California's wildlife resources for the benefit of the entire population of the State. Despite the author's assertions to the contrary, it is obvious that the legislative intent of AB821 is to remove lead projectiles as a source of potential lead poisoning within the range of the California condor. It is the Commission responsibility to

interpret that legislative intent based on evidence and data provided from a variety of sources, including the Department. Therefore, the Department rejects this recommendation because it ignores the legislative intent of AB 821, unnecessarily restricts the Commissions authority, and is not supported by data and analysis provided to date.

The department has recommended a standard of from 0-10% lead by weight in order for a projectile to be certified nonlead; projectiles that meet the final criteria may be certified as nonlead. No distinction between factory ammunition or handloads is recommended.

Description of Proposed Action by Public:

Support for statewide lead ban and ban on lead for .22 caliber.

Proposal Source:

Eric Mills (Testimony at October 12, 2007 meeting)

Recommendation:

Reject

Analysis:

A statewide ban on lead projectiles was considered and discussed in the Final Environmental Document for Methods of Take for big game species as well as for nongame bird and mammal species, but was not the Department's recommendation because it would be overly restrictive and unnecessary to protect the California condor at this time. A ban on lead in the .22 caliber is overly restrictive for hunters as there is little or no evidence of condor feeding on legal-hunter killed game.

Description of Proposed Action by Public:

Support draft document as written

Proposal Source:

Gary Langham- Audobon (Testimony at October 12, 2007 meeting)

Recommendation:

Accept

Analysis:

No analysis necessary

Description of Proposed Action by Public:

Recommends lead ban in condor range

Proposal Source:

Henry Colleto-California Deer Assoc (Testimony at October 12, 2007 meeting)

Recommendation:

Accept

Analysis:

No analysis necessary

Description of Proposed Action by Public:

Ban lead statewide and by all methods

Proposal Source:

Virginia Handley- Animal Switchboard (Testimony at October 12, 2007 meeting)

Cindy Margolis- Oakland Zoo (Testimony at October 12, 2007 meeting)

Recommendation:

Accept

Analysis:

A statewide ban on lead projectiles was considered and discussed in the Final Environmental Document for Methods of Take for big game species as well as for nongame bird and mammal species, but was not the Department's recommendation because it would be overly restrictive and unnecessary to protect the California condor at this time.

Description of Proposed Action by Public:

Recommends lead ban in historic condor range; include .22 when non-lead is available.

Proposal Source:

Pamela Flick- Defenders of Wildlife (Testimony at October 12, 2007 meeting)

Pamela Flick- Defenders of Wildlife (Testimony at November 2, 2007 meeting)

Recommendation:

Reject

Analysis:

Reject area recommendation as overly restrictive at this time. The Department rejects the recommendation regarding future consideration of including .22 caliber ammunition within the lead ban when alternatives become available. The regulation can be modified at a future date (without the addition of any language to allow that at this time) when sufficient data is collected and proper analysis indicates the change is necessary to benefit the condor and would not be overly restrictive on hunter opportunity.

Description of Proposed Action by Public:

Let Nava Bill stand as the regulation, allow hand-loading of wildcat, certify bullets as non-lead

Proposal Source:

Walter Mansell, California Rifle & Pistol Association (Testimony November 2, 2007 meeting)

Recommendation:

Accept with modification

Analysis:

Lead bullets for wildcat would be inconsistent with statute.

Description of Proposed Action by Public:

Recommend non-lead be defined as <0.5 percent

Proposal Source:

Gary Langham- Audobon (Testimony at November 2, 2007 meeting)

Recommendation:

Accept with modification

Analysis:

Recommend <1.0 percent as the threshold for lead content.

Description of Proposed Action by Public:

Support Ab 821, and Department recommendations with some exceptions. Support rebate/coupon program. Other sources of lead from hunting depredation should be addressed.

Proposal Source:

Jeff Miller- Center for Biodiversity (Testimony at December 7, 2007 meeting)

Recommendation:

Accept with modification

Analysis:

Rebate/coupon program is unfunded. Other sources are either not under the Commission (depredation) or could be heard in the future (other species).

Description of Proposed Action by Public:

Support AB 821 area, supports funding for ranchers, supports .22 exemption

Proposal Source:

Susan LaGrande- Calif. Cattlemens Assoc (Testimony at December 7, 2007 meeting)

Recommendation:

Accept with modification.

Analysis:

No funding for coupon program. .22 exemption consistent as an option.

Description of Proposed Action by Public:

Discussion of non-lead ammunition and how difficult the process will be to certify levels.
Concern about enforcing law

Proposal Source:

Ed Worley- National Rifle Assoc. (Testimony at December 7, 2007 meeting)

Recommendation:

Comments noted.

Analysis:

No analysis needed.

Description of Proposed Action by Public:

Implement AB 821 area and species only, allow up to 1 percent lead in projectiles, exempt .22 caliber. Monitor results.

Proposal Source:

Bill Gaines- Calif. Outdoor Heritage (Testimony at November 2, 2007 meeting)

Bill Gaines- Calif. Outdoor Heritage (Testimony at December 7, 2007 meeting)

Recommendation:

Accept

Analysis:

Consistent with Department recommendations

Description of Proposed Action by Public:

Implement AB 821 as passed.

Proposal Source:

Walter Mansell, California Rifle & Pistol Association (Testimony December 7, 2007)

Recommendation:

Accept with modification

Analysis:

Consistent with Department recommendations at a minimum.

Description of Proposed Action by Public:

Support Department proposed changes and depredation restrictions and .22 caliber lead ban.

Proposal Source:

Eric Brunneman- Pinnacles NM (Testimony December 7, 2007)

Recommendation:

Accept with modification

Analysis:

Consistent with Department recommendations except .22 ban. Depredation not at the discretion of Commission.

Description of Proposed Action by Public:

Brief presentation on Pinnacles and wild pig as food source

Proposal Source:

Jim Petterson- Pinnacles NM (Testimony December 7, 2007)

Recommendation:

Information item

Analysis:

No analysis needed.

Description of Proposed Action by Public:

Support Department recommendations, except include all of South A zone

Proposal Source:

Pamela Flick- Defenders of Wildlife (Testimony December 7, 2007)

Recommendation:

Accept with modification

Analysis:

Consistent with Department recommendations, except south A zone inclusion as not needed.

Description of Proposed Action by Public:

Low lead in bullets similar to Barnes bullets. Range to be historic range

Proposal Source:

Jerry Stidham- Ventana W. S. (Testimony November 2, 2007)

Recommendation:

Accept with modification.

Analysis:

Consistent with Department recommendations except the geographic area.

Description of Proposed Action by Public:

Oppose expanding area beyond AB 821 area, suggest scientific review, question certification process.

Proposal Source:

Ed Worley- Natl. Rifle Assoc. (Testimony November 2, 2007)

Recommendation:

Accept with modification

Analysis:

Consistent with Department recommendations on geographic area; scientific analysis has been conducted. Certification process is to be developed.

Description of Proposed Action by Public:

Environmental Document did not study effect on hunting. Science is not totally known

Proposal Source:

Walter Mansell- Calif. Rifle and Pistol Assoc. (Testimony December 7, 2007)

Recommendation:

Reject

Analysis:

Project was eliminating lead from environment, study of effects on hunting/hunters activity not required per CEQA. Science is not complete, the Department agrees.