

**State of California  
The Natural Resources Agency  
DEPARTMENT OF FISH AND GAME**

**Responses to Public Comments for Changes  
in the 2010-2012 Elk Hunting Regulations**

- E1 Description of Proposed Action by Public: Against raising the number of tags for the Marble Mountain elk hunt. Believes it is not justified unless the unit is broken up into smaller-sub-units.

Proposal Source: Tom Higgs. (e-mail dated February 9, 2010).

Recommendation: Reject

Analysis: The Department routinely proposes tag ranges higher than what it anticipates will be issued. The overall tag numbers will be increased by 10 (antlerless) than previously issued. Final tag numbers authorized are 35 general method bull tags, 10 general method antlerless tags, 2 apprentice either-sex tags and 5 late season combination archery/muzzleloader either-sex tags.

The Department believes retaining a relatively large undivided zone compared to splitting it into smaller hunt units increases public opportunity by providing a larger geographic area in which successful applicants can hunt. Elk in this region are not uniformly distributed within the zone and can be highly mobile. In some portions of the hunt area, elk may be inaccessible to hunters because they have moved onto private lands where hunting is not allowed or have moved outside the zone boundary. Allowing tag holders the flexibility to hunt within a large zone increases their opportunity to successfully locate elk.

- E2 Description of Proposed Action by Public: Believes the Department is going to issue 100 tags for the Marble Mountain zone and is not in favor of tag increases as it will increase pressure. Indicates that there is no science or studies that show the herds can sustain that type of harvest.

Proposal Source: Janis K. Higgs. (e-mail dated February 11, 2010).

Recommendation: Reject

Analysis: The Department did not recommend 100 tags. The maximum of the tag ranges combined is 114 tags. Typically the Department recommends the mean of the tag ranges. Tag numbers proposed and authorized are 35 general method bull tags, 10 general method antlerless tags, 2 apprentice either-sex tags and 5 late season combination archery/muzzleloader either-sex tags.

Anticipated harvest is believed to be similar to past harvest numbers and success rates. Since 1998 average age of harvested males has stayed between a low of 3.5 and a high of 6.78. There is no indication of over harvest at the current proposed harvest level.

E3 Description of Proposed Action by Public: Wants to add archery only hunt in the west Tinemaha zone. Proposes it occur concurrent with the Owens Valley Multi-zone Archery Only Hunt with bull and cow tags available.

Proposal Source: Bill Kuehn representing California Bowmen Hunters and State Archery Association. (e-mail dated February 17, 2010).

Recommendation: Reject

Analysis: As part of the overall regulation changes the Department has proposed numerous changes in the Owens Valley including zone splitting. Within these changes the Department believes that tag allocation between the various methods remain in the same proportion (archery only, muzzleloader only, apprentice).

The Department must consider all stakeholders in issuing tags. Archery is a legal method of take under the general tags for the West Tinemaha zone. Previously one bull archery tag was issued which was valid in both Tinemaha and West Tinemaha. The Department is issuing tags independently for Tinemaha and West Tinemaha. The Department is trying to maintain the previous proportion of tag types

(archery, muzzleloader, apprentice, and general) to the extent possible. The Department is issuing an archery bull tag in the Tinemaha zone.

- E4 Description of Proposed Action by Public: Would like archery to be a method of take on the Bureau of Reclamation property for the East Park Reservoir hunt.

Proposal Source: Albert Overholtzer. (e-mail dated February 20, 2010).

Recommendation: Reject

Analysis: The Bureau of Reclamation dictates what type of weapons is valid on their property, not the Department.

- E5 Description of Proposed Action by Public: Indicates it is irresponsible for the Department to lift the regulations on elk hunting

Proposal Source: Brian Cornell. (letter dated February 22, 2010).

Recommendation: Reject

Analysis: The Department is not lifting the regulations regarding elk hunting. Sustainable regulations and harvest quotas have been proposed and analyzed.

- E6 Description of Proposed Action by Public: Is against hunting of any wildlife

Proposal Source: Penny Scribner (letter dated March 8, 2010).

Recommendation: Reject

Analysis: The Department believes regulated hunting of wildlife is appropriate.

- E7 Description of Proposed Action by Public: In agreement over converting either-sex tags to bull and antlerless tags for the Marble

Mountain and Northeastern CA zones. They support the expansion of these zones only if the zones are split into smaller more manageable areas to better distribute hunters and refine harvest to specific areas.

Proposal Source: Rich Klug, Siskiyou County Fish and Game Commission (e-mail dated March 11, 2010)

Recommendation: agree

- E8 Description of Proposed Action by Public: They support the expansion of the Marble Mountain and Northeastern CA zones only if the zones are split into smaller more manageable areas to better distribute hunters and refine harvest to specific areas.

Proposal Source: Rich Klug, Siskiyou County Fish and Game Commission (e-mail dated March 11, 2010)

Recommendation: reject

Analysis: The Department believes retaining a relatively large undivided zone compared to splitting it into smaller hunt units increases public opportunity by providing a larger geographic area in which successful applicants can hunt. Elk in this region are not uniformly distributed within the zone and can be highly mobile. In some portions of the hunt area, elk may be inaccessible to hunters because they have moved onto private lands where hunting is not allowed or have moved outside the zone boundary. Allowing tag holders the flexibility to hunt within a large zone increases their opportunity to successfully locate elk.

Description of Proposed Action by Public: Want to see a definitive, biologically supportable relationship between elk populations and the number of tags issued. For example if the elk population is 100-200 animals there will be 5 tags issued and if the elk population estimate is 5,000-6,000 there will be 100 tags issued.

Proposal Source: Rich Klug, Siskiyou County Fish and Game Commission (e-mail dated March 11, 2010)

Recommendation: Reject

Analysis: Tag allocation is based on a number of factors besides overall population numbers, such as age structure, recruitment rates, survivability, habitat quality, hunter success, etc. All these factors are reviewed to determine tag quotas for each individual hunt.

- E9 Description of Proposed Action by Public: Oppose the unit boundary modifications for the Northeastern California elk hunt. Feel it decreases current landowners chances of acquiring a landowner elk tag.

Proposal Source: Steve Hensen, Roseburg Resources (e-mail dated March 15, 2010)

Recommendation: Reject

Analysis: Cooperative landowner elk tags are allocated based on general tag allocations for each zone (20% of general tags for each hunt are available to landowners). If more landowners apply for the cooperative elk tag and tag numbers stay the same it could decrease the chances of receiving a tag. The Department believes the expansion of the Northeastern California elk hunt is appropriate to include new area which currently supports elk.

- E10 Description of Proposed Action by Public: They want their elk herd removed from the Marble Mountain Roosevelt elk hunt. Indicates the Department has no data to continue to hunt their elk. Indicates that the Department, without any scientific data, is going to exponentially increase the boundary and tag allocation for this hunt. They strongly support establishing a separate Trinity County Roosevelt elk hunt with limited cow and bull tags for the 2010 season.

Proposal Source: Peter J. Finnie, Trinity County Fish and Game Advisory Committee (Letter received April 4, 2010)

Recommendation: Reject

Analysis: The Department believes harvest objectives will be met for elk within the zone, based on the historic harvest, number of tags, and elk distribution within the hunt area. Expanding the boundary of the Marble Mountain Elk Hunt south to highway 36, is intended to increase the area available to successful tag applicants. The number of elk taken by hunters within this area is expected to comprise a relatively small portion of the total harvest within the zone. Hunter pressure will likely continue to be greatest where elk densities are high, elk are relatively accessible, and where previous hunters are known to have been successful. Although this has likely reduced the abundance of older, large antlered bull elk in some localized areas, the Department does not believe this has adversely affected elk within the Marble Mountain Elk Hunt based on the continued high hunter success and age class of elk harvested.

Tag numbers authorized are 35 general method bull tags, 10 general method antlerless tags, 2 apprentice either-sex tags and 5 late season combination archery/muzzleloader either-sex tags.

E11 Description of Proposed Action by Public: Opposed to the addition of a late season elk hunts. Felt the Department should not be hunting them when they are in the rut.

Proposal Source: Virginia Handley (Public Testimony Fish and Game Commission meeting April 8, 2010).

Recommendation: Reject

Analysis: The proposed season dates for this hunt are outside of the "rut". Elk enter their breeding season in early fall, typically in September. The Department believes the hunt and timing are biologically appropriate.