



Alameda Creek Alliance

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California Fish and Game Commission
P.O. Box 944209
Sacramento, CA 94244-2090

California Department of Fish and Game
Bay-Delta Region
7329 Silverado Trail
Napa, CA 94558

Senator Ellen Corbett
Fremont District Office
9155 Liberty St., #F610
Fremont, CA 94538

Re: Alameda County Tule Elk Hunt

The Alameda Creek Alliance is a non-profit community watershed group dedicated to the protection and restoration of the natural ecosystems of the Alameda Creek watershed. We have more than 1,800 members that live in or near the watershed. We have concerns about the new tule elk hunt zone in Alameda County and its potential cumulative impact on the declining tule elk population in our watershed. **For the reasons outlined below, we urge the Commission to withdraw the Alameda tule elk hunt zone until more information is known.**

In spring of this year, the Fish and Game Commission approved several new hunt zones for tule elk, which have rebounded from near-extinction in California but are still at relatively low numbers in Alameda County. Neither the Commission nor the Department of Fish and Game notified or engaged local conservation groups or the non-hunting public in Alameda County about the new hunt. Our organization had no idea the hunt zone was proposed nor that there had been a (cursory) environmental review until last month, when the first hunt season was underway.

It is important to clarify that the Alameda Creek Alliance is not an anti-hunting organization, nor do we have an anti-hunting agenda. We are however, opposed to trophy hunting, misguided predator control programs, and hunting of native species that have low population numbers. Our concern here is with maintaining a healthy population of tule elk in our watershed, wildlife management based on sound science, and transparency in agency decision-making.

It is unknown whether the local agencies with the most information about tule elk numbers and population dynamics in Alameda County were contacted – the San Francisco Public Utilities Commission, East Bay Regional Park District, and Alameda County. Information we have obtained from those agencies shows that the San Antonio, or Sunol, tule elk herd, the largest in Alameda County, is in decline and currently consists of less than 60 elk.

The Commission's environmental review for the new hunt zones had absolutely no information about elk population numbers for Alameda County, nor has the Department or the Commission

made any such information publicly available yet in response to our requests. The environmental review simply stated: "These areas currently support adequate numbers of elk to support a limited harvest. Establishing (new) tule elk hunts in these areas is desired to improve hunter opportunity and is consistent with the statewide management objectives for tule elk."

Does Alameda County support adequate numbers of elk to support a limited harvest? What criteria was this determination based on? Neither the Commission nor the Department have published any such criteria nor was it specified in the environmental review.

In the absence of information from the Department, we researched all publicly available information about tule elk in Alameda County. In 1978 tule elk were reintroduced to Grant Ranch County Park in Santa Clara County. By 1980 this herd had split and dispersed, with some elk moving to Mt. Hamilton, and others establishing themselves in the Alameda Creek watershed in an area around San Antonio Reservoir, the "Sunol herd."

According to the Alameda County Planning Department (1984) there were 21 elk in the Sunol herd by 1984. A subsequent report produced for the Planning Department in 1986 (Harvey & Stanley 1987) documented that there were 28 known elk in the Sunol herd. The population of the Sunol herd apparently peaked in the 1990s: the Planning Department estimated there were 70 elk in 1995 (Alameda County Planning Department 1995); and resource managers at local agencies reported seeing up to 90 elk at one time. The Planning Department noted in 1995 that poaching of elk from the Sunol herd was a problem. The number of elk in the Sunol herd has apparently declined since then. A population estimate from 2005 based on extensive aerial surveys was only 58 elk (SFPUC 2005). Although we could find no recent published survey information, resource managers at local agencies confirm that the current Sunol herd estimate is less than 60 elk. There are no other large elk herds in Alameda County – only smaller dispersed groups of elk.

These reports by Alameda County and the SFPUC are cited below and posted on our web site and we will be happy to provide copies to the Commission and the Department – we would appreciate receiving any additional information the Department or the Commission has regarding tule elk numbers in Alameda County.

The new Alameda hunt zone provides one elk tag per year for hunting on private lands south of I-580, west of I-5, east of I-680, and extends south to the Santa Clara, San Joaquin, and Stanislaus County lines. This hunt zone essentially targets the Sunol herd and elk in Corral Hollow. There is an additional new hunt zone in Santa Clara County that allows shooting of 1 elk annually from the Mt. Hamilton herd. The Alameda elk hunt season runs for 16 days beginning the second Saturday in October. The Alameda hunt allows for one bull tag, which means an elk with one or more antlers at least four inches long can be shot.

We have some questions about the potential impacts of the hunt. In practice, hunters will target the largest bull elk they can shoot, preferably a large "primary bull." Department of Fish and Game statistics indicate that collectively, all of California's tule elk hunts have a 62% success rate. The Sunol elk population has never been legally hunted, and will likely be easy targets for hunters. Thus there are good odds that a large bull or the largest bull elk will be shot from Alameda County each year. Since primary bulls are responsible for more than 80% of the breeding and the Alameda hunt occurs during the end of the elk mating season, which runs through mid-October, what will the impact be of shooting the largest elk and a primary breeder on the Sunol herd population dynamics? Does Alameda County in fact have adequate elk numbers to support regular "harvest" of primary bulls?

Elk in Alameda County face many threats, particularly habitat loss and impacts from being hemmed in by urban development. Without sound and clearly-defined management policies, cumulative impacts from hunting could cause permanent declines in the population. The

declining Sunol elk herd is a public resource for everyone to enjoy, not just hunters. The state hunting regulations will not be revisited until 2012. We urge the Commission to withdraw the new hunt zone, publish information on the elk population in Alameda County, and initiate a more transparent decision-making process on whether to reinstate the hunt.

Sincerely,

Jeff Miller
Executive Director

Reports Cited:

Alameda County Planning Department. 1995. Revised Tule Elk Mitigation Program. Staff Analysis memo, April 17, 1995. Supplement to Environmental Impact Report for Apperson Quarry, Surface Mining Permit 17.

Harvey & Stanley Associates, Inc. 1987. San Antonio Tule Elk Herd Monitoring Project Final Report. Prepared for Oliver DeSilva, Inc. Included as Attachment to the 1984 Environmental Impact Report for Apperson Quarry, Surface Mining Permit 17.

San Francisco Public Utilities Commission. 2005. San Antonio Tule Elk Herd Draft Progress Report. Wildlife Resource Associates. Prepared for: City and County of San Francisco Public Utilities Commission, Land and Resources Management Section, June 2005.