



Alameda Creek Alliance

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California Fish and Game Commission
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Comments on Mammal Hunting Regulations and Alameda Elk Hunt

These are comments of the Alameda Creek Alliance on the proposed changes to mammal hunting regulations and the tule elk hunt in Alameda County. 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 2,100 members that live in or near the watershed.

We continue to be frustrated by the lack of transparency regarding decisions about hunting tule elk, and the refusal of the Department of Fish and Wildlife and the Commission to provide meaningful information to the public regarding the population status and population trend of tule elk herds that are proposed for hunting.

We first raised these issues with the Commission in 2010 and the Department and the Commission have still have not provided this basic information. The Department did send us some raw elk survey data in response to a Public Records Act request, but this information was minimal and incomplete.

Nowhere in the November 2015 Draft Environmental Document, nor in the published Initial Statement of Reasons, nor anywhere on the Department or Commission web pages can there be found any meaningful information regarding the population status or the population trend of tule elk in the Alameda hunt zone. The Draft Environmental Document contains one sentence claiming there are "100-200 elk" within the Alameda hunt area boundary, but gives no details as to how this estimate was made, where the elk are, which are the major herds, and what the population trend is for tule elk in the hunt zone. The Department previously claimed that the hunt zone "supports adequate numbers of elk to support a limited harvest" but does not provide any basis for this conclusion.

The Draft Environmental Document provides a computer model which simulates herd performance, based on unexplained assumptions about elk mortality from other causes and calf production. What is not provided are any actual surveys of tule elk in Alameda County, nor is there any information on population trend.

The only publicly available information on the status of tule elk within Alameda County is regarding the Sunol/Apperson Ridge (San Antonio) herd, which declined to 58 elk in 2005 (SFPUC 2005). We are unable to locate any more recent population estimate for this herd. The Department provided us with raw survey data from 2009 documenting 20 tule elk on Mines Road/San Antonio Valley Road, but some of the survey area was in Santa Clara County, outside of the Alameda hunt zone. The Department also provided us with raw data from 2009 surveys of the Connolly Ranch (Alameda and San Joaquin counties), where the herd had

declined to 84 elk in 2009. It is unclear how much of this elk herd is within the Alameda hunt zone.

If the Department has more recent and complete survey data of tule elk within the Alameda hunt zone, it should provide that to the public before reauthorizing hunting in an area where the only two significant herds were known to be declining, and for which it has not provided any recent population information.

The Draft Environmental Document notes that the proposed project would authorize up to 4 hunt tags for bull elk and up to 10 hunt tags for antlerless elk in Alameda County. The document claims that such authorization would likely result in a maximum of 3 bulls and 2 antlerless elk being killed by hunters.

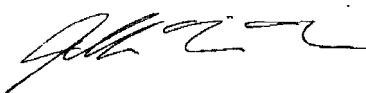
The Draft Environmental Document acknowledges the potential for significant effects from elk hunting, including impacts on the gene pool, impacts on social structure and cumulative impacts. Yet nowhere in the document are these impacts analyzed regarding elk in the Alameda hunt zone.

The Draft Environmental Document justifies the Alameda elk hunt because “removal of individuals will have little influence on the statewide elk population” and further claims that “the removal of individual animals from selected herds which are relatively large and healthy will not significantly reduce herd size on a long-term basis. Production and survival of young animals within each herd will replace the animals removed by hunting.”

How did the Department determine that the Alameda elk herd is “relatively large and healthy,” without any recent survey data or population trend? How did the Department reach the conclusion that authorizing hunting of up to 14 elk in the Alameda hunt zone “will not significantly reduce the herd size,” without any information on the existing herd size, other causes of mortality, or data on survivorship of young? Where is the Department’s evidence that “production and survival of young” in the Alameda herd is adequate to replace animals shot during hunts? The Draft Environmental Document concludes that the proposed hunt authorization “will not have a significant adverse impact on either local or statewide elk populations” but has provided no information to base that assertion on regarding the Alameda herd, other than wishful thinking.

Tule elk in Alameda County face many threats, including habitat loss, poaching, vehicle strikes, 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 Alameda tule elk population. We urge the Commission to provide up to date information on the elk population in Alameda County, and initiate a more transparent decision-making process on the justification for hunting tule elk in Alameda County.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jeff Miller', written in a cursive style.

Jeff Miller
Executive Director