

June 18, 2024



California Fish and Game Commissioners
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VIA:

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Executive Director
California Fish and Game Commission
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Dear Commissioners:

Safari Club International and the ten chapters of the SCI California Coalition (collectively SCI) must object to the proposed approval of the Santa Catalina Island 5-year PLM Area License Renewal for 2024-2028. SCI requests that this item be removed from consent, and it be rejected by the Fish and Game Commission (FGC).

The Private Land Management (PLM) program was developed to benefit wildlife and specifically the "...fish and wildlife resources of those lands." The Catalina Island Conservancy (Conservancy) has no intent of promoting the conservation of wildlife as publicly proclaimed in announcing their efforts to eradicate the mule deer herd. The plans have been widely covered in the news media and opposed by humane societies, island residents, the City of Avalon, the Los Angeles County Board of Supervisors, and hunting and conservation groups.

To this end the Conservancy applied to the Department of Fish and Wildlife (CDFW) for a Scientific Collection Permit to authorize the eradication. This same permit was rejected twice previously by CDFW for a lack of supporting science. In both instances, the Conservancy was provided direction on specific studies to correct these errors to support the permit application. No scientific reports responsive to the previous direction by CDFW have been made publicly available, leading observers to believe that the Conservancy is relying on political pressure instead of science to support their current request.

We are also unable to locate the most recent Annual Report that is mandatory under the PLM program. If accurate, the Conservancy is out of compliance with the requirements of the PLM program that was approved in 2023.

The 2022 Annual Report from the Conservancy is available. In that report the Conservancy both claims "The Conservancy's ongoing land management activities are focused on achieving a

healthy, sustainable deer herd while ensuring the overall ecosystem health of the island.” Yet also stated in the same annual report that 2023 would be the last hunt allowed on the island. In the 2022 Annual Report, the Conservancy requested an increase to 500 deer tags yet noted that the average harvest has been 235 animals for 2010 – 2022. Now the Conservancy is requesting 1,000 tags for 2024 even though the 2023 Annual Report is not available.

Given the large increase in tags, the FGC might want to consider that Section 3401 (b) of the Fish and Game Code specifies:

The commission shall authorize hunting during the rut only in a wildlife habitat enhancement and management area when that hunting is consistent with the management plans prepared for that area or herd and does not result in an overall negative effect on the deer herd population in that area.

With the evidence of the Conservancy’s desire to eradicate the deer herd, the large increase in tags requested in 2023 and 2024 and lack of current data, Section 3401 (b) establishes an additional area where the Conservancy (and CDFW) have failed in supporting the ability of the FGC to approve the proposed PLM program.

The California Code of Regulations 14 CCR 601 specifies that “No hunter shall take more than two deer each year anywhere in California on either public or private lands.” Even if the law could be followed by adequately conserving the herd with the issuance of 1,000 tags, SCI is concerned that the Conservancy has presented no credible plan for how they would recruit or safely allow access to well over 500 hunters.

Given the myriads of issues currently outstanding, the lack of responsive scientific data, likely violations of state laws and regulations, the known intentions of the Conservancy to eradicate the mule deer herd, and potential safety issues the FGC should reject the PLM plan for Santa Catalina Island 2024 – 2028.

Further, SCI objects to the misuse of Private Land Management programs that are intended to conserve wildlife and wildlife habitat. The misuse of programs and permits contributes to distrust of all landowners and the government entities charged with regulating compliance. As less Americans have a connection to the land and a lack of understanding of the values of hunting to feed families, promote active recreation and conserve wildlife, all entities with an interest in preserving access must act responsibly and maintain the integrity and purpose of programs purported to accomplish those purposes.

Sincerely,



W. Laird Hamberlin
CEO
Safari Club International



Lisa C. McNamee
Legislative Coordinator
SCI CA Coalition