



March 13, 2020

The Honorable Henry I. Stern
 State Capitol, Room 5080
 Sacramento, CA 95814

RE: SB 1175: Iconic African Species Protection Act - OPPOSE

Dear Senator Stern:

The below signatory wildlife conservation organizations must strongly oppose your SB 1175, legislation which would enact the “Iconic African Species Protection Act” and criminalize the possession of certain African animals and their parts.

To begin, SB 1175 is unenforceable. This legislation proposes to impose a state civil penalty for activities expressly authorized by the federal Endangered Species Act (ESA) which allows import of listed species when the U.S. Fish and Wildlife Species determines that the activity “enhances the survival of the species.” Not only is what SB 1175 proposes in conflict with the federal ESA, it is also in conflict with the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) – an international agreement between governments with the goal of ensuring that international trade in specimens of wild animals and plants does not threaten their survival. Both the federal ESA and CITES wholly preempt state law. As you are aware, your SB 1487 – similar legislation introduced during the 2018 Session – was vetoed by Governor Brown for exactly that reason.

Conflict with federal ESA and CITES aside, outlawing the possession of these species and/or their parts in California would sharply reduce revenue generated by hunters which is vitally important to the conservation efforts of these species. Funding generated by lawful hunters substantially benefits the economies of local communities, with all the meat from lawfully harvested species also going to the subsistence of those in need. Also, of importance is the fact that the value placed on these animals as a species desired by legal hunters substantially increases the interest in, and ability of local communities to protect those species from the serious threat of local poachers. The very real significant impact SB 1175 would have upon the local communities and wildlife in Africa was confirmed by letters of strong opposition to your SB 1487 submitted in 2018 by the governments of South Africa, Namibia, Zimbabwe, Tanzania and others.

SB 1175 would also have an unacceptable and unbudgeted fiscal impact on California. When SB 1487 was being debated in 2018, DFW estimated the bill would require 12.0 PYs, \$3 million to implement in year one, and \$2.8 million annually thereafter to enforce the ban. SB 1175 would redirect these critical resources away from protecting California’s wildlife and important on-the-ground wildlife habitat and research programs throughout our state.

Finally, coined the “Iconic African Species Protection Act”, the selection of species called out in SB 1175 is not based on science or population health. Lawful hunting of these species is highly regulated by federal and international law, local jurisdictions and professional wildlife managers, with the level of take of each species carefully based on the best available science. In many cases, these species are overly abundant, with lawful hunting serving as an important tool for local wildlife managers to maintain populations in check with their habitats. Law-abiding hunters also serve as a valuable tool for the removal of nonproductive individuals and/or those causing damage to local agriculture or depredate on livestock.

The below listed wildlife conservation organizations are acutely aware of the critical and principal role science-based regulated hunting plays in the conservation of our wildlife and the habitats they depend upon. SB 1175 would do nothing to promote the health of the “iconic” species the bill claims to protect. Rather, if implemented, this legislation would have a substantial negative impact on the health of these species by sharply reducing the revenue streams desperately needed to preserve and enhance their habitats and to combat poaching. Because of all these above reasons, we must strongly oppose your SB 1175.

Sincerely,

Donn Walgamuth, President
California Deer Association

Kyle Weaver, President and CEO
Rocky Mountain Elk Foundation

Fred Harpster, President
Black Brant Group

Mark Hennelly, Vice President of Government Relations
California Waterfowl Association

Lori Jacobs, President
California Houndsmen for Conservation

Don Martin, President
California Chapter – Wild Sheep Foundation

Steve Miller, President
Tulare Basin Wetlands Association

Gary F. Brennan, President
San Diego County Wildlife Federation

Don Kirby, President
Cal-Ore Wetland and Waterfowl Council

Chriss Bowles, President
California Bowmen Hunters/State Archery Association

Rick Travis, Executive Director
California Rifle and Pistol Association

Cathie Nelson, President
San Francisco Bay Area Chapter - Safari Club International

Aoibheann Cline, Western States Coordinator
Congressional Sportsmen’s Foundation

cc: Members, Senate Natural Resources and Water Committee