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October 31, 2006

Field Supervisor
Arizona Ecological Services Office
2321 West Royal Palm Road, Suite 103
Phoenix, Arizona 85021-4951
VIA FACSIMILE (602) 242-2513

Dear Field Supervisor:

The Sierra Club's Grand Canyon Chapter appreciates the opportunity to submit comments on the 5-year review of the California condor reintroduction program. The Sierra Club has more than 13,000 members in the state of Arizona and over 750,000 members nationwide. Many of our members enjoy hiking, backpacking, and educational opportunities in the condor reintroduction area and care deeply about the success of the reintroduction effort.

The Sierra Club has supported protection of the condor habitat including the Vermilion Cliffs National Monument and have advocated strongly for protective management of these public lands – management that retains the primitive nature of the lands. This management regime can only help the condor. We have also conducted a series of informational outings to the condor release area to inform our members and the public about the importance of protecting the lands and protecting this rare bird. The Peregrine Fund provided experts for these outings and discussed the biology of the condors and the major threats to their survival.

The Sierra Club is highly supportive of the California condor reintroduction program. This program is an important conservation effort to restore a unique, significant species, and represents a major success for the Endangered Species Act. We hope the program will continue to progress and that it will succeed in the California condor recovery goal: to establish two geographically separate, self-sustaining populations -- a primary population in California and the other outside of California, each with 150 birds and at least 15 breeding pairs. Ultimately, we hope to see strong sustainable populations of these magnificent birds throughout their former range.

Toward that end, we recommend the following:

- Increase public education aimed at raising awareness of the importance and wonder of the California condor, both as an essential part of the ecosystem and as part of our natural heritage, as well as teaching members of the public to avoid harmful behaviors, such as those related to hunting that can lead to lead exposure, feeding of the birds, leaving out garbage, and harassment or other inappropriate interactions.
- A focused and thorough effort at hunter education is especially necessary, given that lead poisoning appears to be the primary cause of death amongst free-ranging condors in Arizona. According to the Peregrine Fund, between 1999 and 2004 forty percent of the condor blood tests

indicated lead exposure and nine percent indicated exposure at levels where there would show effects. Hunters should be educated to use non-toxic ammunition, and/or to remove or adequately cover bullet killed carcasses. The education effort should include awareness of the dangers of lead to the human body and environment as well as to the condor.

- Continue to engage collaboratively with representatives of the firearms industry, sporting groups, and hunters to address the lead-poisoning problem.
- Continue to offer free non-toxic ammunition to hunters with permits in the recovery area.
- Continue and increase close monitoring, using both radio tracking and satellite-reporting GPS transmitters to expedite information gathering and enable rapid responses and intervention where negative events threaten setbacks.
- Improve the recovery and analysis of dead bird carcasses.
- Continue the lead testing and treatment program.
- Site new power lines and any other developments that pose a threat to condor recovery away from the recovery areas.
- Enforce meaningful consequences for human harassment or harm to condors and offer rewards for information leading to convictions for shooting, harming, or harassment of condors.
- Protect and maintain the primitive nature of condor habitat.
- Increase scientific efforts at filling in gaps in knowledge concerning condor behavior, needs, and mortality factors.
- Continued protection of the condor habitat and a management regime that maintains its primitive nature.

Again, we support the reintroduction and recovery effort strongly and celebrate the successes of the program thus far. We would appreciate it if you kept us informed about any developments or issues relative to this process and to the condors.

Thank you.

Sincerely,



Sandy Bahr
Conservation Outreach Director
Sierra Club – Grand Canyon Chapter