

Staff Summary for February 12-13, 2025

16B. Wildlife Resources Committee (WRC)**Today's Item**Information Action

Receive a summary and recommendations from the January 15, 2025 WRC meeting, potentially act on the recommendations, discuss referred topics, consider revisions to topics and timing, and consider scheduling action on the previously-referred topic of falconry regulation changes.

Summary of Previous/Future Actions

- Previous WRC meeting January 15, 2025; WRC
- **Today consider approving WRC recommendations February 12-13, 2025**
- Next WRC meeting May 15, 2025; WRC

Background

WRC works under Commission direction to set and accomplish its work plan (Exhibit 1).

Previous Committee Meeting

WRC met on January 15 in Sacramento, with webinar and phone options for public participation. WRC meeting minutes may be found on the [Commission's YouTube channel](#), with a link also available on the Commission's meeting page at fgc.ca.gov/Meetings. Discussion topics are briefly summarized in this document.

Inland Sport Fishing

- **Striped Bass Slot Limit:** The Department presented a proposed regulation change that would support WRC's previous recommendation for an 18-30 inch slot limit for striped bass, which meeting participants generally supported as a minor change to a previously-granted petition for regulation change (#2022-12) submitted by the Nor-Cal Guides and Sportsmen's Association. A water district submitted comments expressing continued concern that the proposed regulation may negatively impact native fish species due to increased predation, in particular salmonid species listed under the California Endangered Species Act and federal Endangered Species Act. The Department reiterated that, as previously addressed in WRC discussion and meeting materials, there is no evidence that the proposed regulation is likely to have an appreciable impact on salmonid populations. The Department also stressed the importance of habitat restoration and improved water management to salmonid recovery.
- **Inland Sport Fishing:** WRC supported the Department's proposed changes to inland sport fishing regulations and moving them forward to the full Commission. Commission staff noted that, due to capacity constraints, the rulemaking timing would need to be discussed at the February 12-13, 2025 Commission meeting.

Since the January WRC meeting, staff has conferred with the Department and both recommend that the Department-proposed rulemaking be postponed and combined

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with any changes identified this year for collective consideration in 2026. A timing change will help address workload capacity concerns for both organizations.

Big Game Hunting

- **Preference Points:** The Department expressed concerns with the amount of staff time required to process big game preference point returns due to wildfire. Hunters, however, expressed concern regarding a suggested regulation change to require that 100% of public lands within a hunting zone be closed in order for hunters to qualify for preference points to be returned. Hunters stated that each zone has unique terrain, different access points, and varying individual needs (e.g., hunter mobility). The co-chairs stressed the goal of reducing Department staff workload, noting that the Department's more liberal approach could delay hunting opportunities for others. Hunters also suggested that the Department's system for returning preference points post-season is already generous, and to consider implementing objective standards if further expansion is recommended.
- **Chronic Wasting Disease (CWD):** The Department presented the results of 2024 CWD testing, with 1,756 deer and elk tested in 2024 and no new detections; department staff indicated that targeted removal can be a potentially effective method for controlling CWD spread. Discussions centered around potential regulations to limit the movement of deer carcasses within CWD management zones (CMZs). A hunter proposed that the discussion should be exploratory only at this stage, expressing concern about the logistics of requiring hunters to submit deer heads for sampling. However, WRC stressed the urgency of the issue and favored a precautionary approach, noting the need for objective criteria when setting movement restrictions, and suggesting to initially focus on hunter harvest.

Falconry

The Department proposed five changes to falconry regulations, stemming from litigation and the need to comply with federal regulations. In brief, the proposed changes were:

1. Delete certification agreeing to unannounced inspections.
2. Delete restrictions on exhibiting birds.
3. Disallow out-of-state falconry examinations.
4. Require that birds be housed outside of residences (with limited exceptions).
5. Update forms to correspond with these changes.

Participants noted concerns regarding the current requirements allowing unannounced inspections, inequities resulting from requiring outdoor facilities, and overall costs of the regulatory proposals. Some expressed the belief that the proposed regulatory changes will not stop litigation. Several participants emphasized that falconers are invested in the safety of their birds, stating that some smaller birds do better indoors, and that the proposed changes requiring outdoor facilities may raise the risk of avian influenza. Participants proposed that inspections could be performed by a non-Department enforcement officer.

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The co-chairs engaged with the Department regarding the federal regulations delegated to the states and about the number of incidences reporting animal mistreatment through unannounced inspections. The Department noted that unannounced inspections are required by federal falconry regulations. WRC expressed interest in learning if other states are implementing the federal standards and requested to resume the discussion via a WRC teleconference meeting some time before the April Commission meeting.

Take of Nongame Mammals

Continuing a conversation that began at the January 2023 WRC meeting, several participants requested to explore ways to provide non-game animals with the same level of protection as game species, with the belief that it would allow the Department to track removals and place greater responsibility on property owners to mitigate future wildlife conflicts. Participants asserted that indiscriminate take, disguised as depredation, has occurred in cities like Torrance and Anaheim. A conversation ensued regarding the potential need for consistent depredation regulations. While several participants acknowledged that coyote conflict is an issue, they suggested the potential to coexist through placing responsibility on property owners to take preventative measures, such as regulating removal of nongame species through permits. Several participants raised concerns about the ability to control coyotes and how to effectively track and manage coyote depredation.

WRC Co-Chair Zavaleta summarized public comments, identifying the central issue as indiscriminate take, while recognizing concerns about imposing additional restrictions and managing nuisance animals effectively. The co-chair suggested that the Commission focus a rulemaking effort solely on coyotes, in part to address the inconsistency of indiscriminate take with the Commission's Terrestrial Predator Policy. WRC also emphasized that any regulatory changes should not preclude recreational coyote hunting.

Committee Recommendations

There are five recommendations related to rulemakings for consideration today:

1. *Striped Bass Slot Limit*: Support a future rulemaking to set a striped bass slot limit of 18-30 inches, as recommended by the Department, and request that the Department continue monitoring striped bass populations and their impact on salmonids.
2. *Inland Sport Fishing*: Support a future rulemaking regarding inland sport fishing, as recommended by the Department, with timing to be discussed.
3. *Big Game Hunting – Preference Points*: Direct Commission staff to collaborate with the Department to construct and propose regulations for return of big game preference points due to wildfire, to increase efficiency and reduce Department workload, through a future rulemaking.
4. *Big Game Hunting – CWD*: Direct Commission staff to collaborate with the Department to recommend an appropriate spatial scale for a movement restriction for deer, and support adding regulatory language regarding the movement of deer carcasses in CMZs to the current big game rulemaking.

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5. *Falconry*: Approve scheduling an additional WRC meeting via teleconference sometime between the February and April Commission meetings, with the sole topic of falconry regulations.
6. *Take of Nongame Mammals*: Support a future rulemaking focused on coyotes, to remove coyotes from the broad take provisions of Section 472 while maintaining coyote sport hunting opportunities.

Committee Work Plan and Future Meetings

Topics that have been referred from the Commission to WRC are displayed in a work plan for scheduling and tracking. The updated WRC work plan (Exhibit 1) outlines topics and timelines for Commission-referred items, including MRC- and staff-proposed changes.

Since the January WRC meeting, the Department has indicated it would withdraw the proposed regulation change to require that birds be housed outside of residences (number 4, above) and, instead, focus on the other four proposals. Without the housing proposal, there may not be a need for further WRC dialogue on the other four proposals; instead, the Commission could decide during today's meeting to schedule a rulemaking related to falconry for notice at the April meeting. Swift action is warranted given the legal challenges facing the falconry program and the need to ensure compliance with federal regulations.

Significant Public Comments

1. The California Cattleman's Association (CCA) and HOWL for Wildlife request that the Commission not approve WRC recommendation (number 6) regarding take of nongame mammals or, alternatively, re-refer the topic to WRC for further discussion. The organizations cite uncertainty surrounding the definition of "indiscriminate take" versus depredation, and question whether regulatory changes are justified. CCA cites requirements of the Bagley-Keene Open Meeting Act and HOWL expresses concern about Commission workload (exhibits 2 and 3).
2. Nine commenters oppose regulation changes related to coyotes, citing attacks against people and pets, the lack of data for coyote populations, and the levels of human-wildlife conflict. Commenters also point out that coyotes can carry disease, state that they are becoming less wary of humans, and urge creating a coyote management plan. Samples are provided in exhibits 4 and 5.
3. Three commenters urge the Commission to strengthen protection for native carnivores, to curtail trapping allowances, and to shorten the time animals are allowed in traps. A sample is provided in Exhibit 5.

Recommendation

Commission staff: Approve the WRC recommendations and approve the updated work plan as reflected in Exhibit 1, including any changes identified during today's meeting. In lieu of an additional WRC meeting, support a rulemaking regarding falconry, without the recommendation regarding outside bird housing, to be scheduled for notice at the April meeting. Support combining the recommended inland sport fish regulation changes with a future inland sport fishing rulemaking.

Committee: Approve the WRC recommendations and approve the updated work plan.

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Exhibits

1. [WRC work plan, updated February 4, 2025](#)
2. [Letter from Kirk Wilbur, Vice President of Government Affairs, California Cattlemen's Association, received January 30, 2025](#)
3. [Letter from Mike Costello and Charles Whitwam, HOWL for Wildlife, received January 30, 2025](#)
4. [Email from Steven Childs, received January 15, 2025](#)
5. [Email from Anna Veach, received January 15, 2025](#)
6. [Email from Lisa Lange, received January 14, 2025](#)

Motion

Moved by _____ and seconded by _____ that the Commission approves the WRC recommendations from the January 15, 2025 meeting, and approves the updated work plan as discussed today, except for falconry for which the Commission supports scheduling a rulemaking regarding falconry without any changes regarding outside bird housing, to be scheduled for notice at the April 2025 meeting. The Commission supports combining recommended inland sport fishing regulatory changes with a future inland sport fishing rulemaking.

California Fish and Game Commission
Wildlife Resources Committee (WRC) Work Plan
Scheduled Topics and Timeline for Items Referred to WRC
Updated February 4, 2025

Note: Proposed changes to topics/timing are shown in blue underscore or strike-out font

Topics	Category	Sep 2024	Jan 2025	May 2025
Periodic and Annual Regulations				
Upland (Resident) Game Birds	Regulatory	X/R		X
Big Game Hunting	Regulatory	X/R	X/R	X
Waterfowl Hunting	Annual Regulatory	X/R		X
Central Valley Sport Fishing	Annual Regulatory	X/R		X
Klamath River Basin Sport Fishing	Annual Regulatory	X/R		X
Inland Sport Fishing (including striped bass)	Regulatory	X/R	X/R	
Department Lands	Regulatory			X
Regulations & Legislative Mandates				
Falconry	Referral for Review		X	X
Restricted Species	Regulatory			
Take of Nongame Mammals	Referral for Review	X	X/R	

KEY: X Discussion scheduled X/R Recommendation potentially developed and moved to FGC

CALIFORNIA CATTLEMEN'S ASSOCIATION

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Submitted via email to fgc@fgc.ca.gov

January 30, 2025

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

RE: Committee and Department Reports: Wildlife Resources Committee (Agenda Item 17(B))

President Murray and Commissioners:

By motion of the sole member present, the Commission's Wildlife Resources Committee on January 15 voted to "recommend[] that the Commission approve a future rulemaking to amend Section 472 to remove coyotes, in concert with a future rulemaking to maintain hunting opportunities."¹ The California Cattlemen's Association (CCA) understands that, at its February 12 meeting, the Commission will "potentially act on the recommendations" and "discuss referred topics" from the Wildlife Resources Committee and "consider revisions to topics and timing" of matters referred to the Commission by the Committee.² For the reasons discussed below, **CCA respectfully requests that the Commission re-refer the matter of coyote take regulations to the Wildlife Resources Committee for further discussion and analysis.**

CCA is a statewide trade organization representing more than 1,700 cattle producers who pride themselves on the stewardship of California's land, water, and wildlife resources. Coyotes have significant impacts upon cattle operations, stressing herds, disrupting calving patterns, and killing calves. To protect livestock, ranchers must not merely be reactive (taking coyotes which depredate livestock), they must often be proactive in managing coyote populations to *prevent* harm to livestock. The Wildlife Resources Committee's motion of January 15 risks significant harm to California's livestock producers, but unfortunately insufficient notice precluded livestock producers' perspectives from being adequately represented before the Committee.

I. Re-referral will enable improved notice and public participation

Ahead of the Wildlife Resources Committee's January 15 meeting, CCA was provided no *actual* notice that the Committee was considering whether to curtail the take of coyotes under 14 C.C.R. § 472 – that is, no outreach was made to CCA by Commission or Department staff well-aware of

¹ Video recording: *Wildlife Resources Committee Meeting - January 15, 2025 - Sacramento | Webinar/ Teleconference*, at 6:36:31 (Jan. 15, 2025) (motion of Wildlife Resources Committee Co-Chair Erika Zavaleta), available at https://www.youtube.com/watch?v=_tz6KIOpF8M [hereinafter January 15, 2025 WRC Meeting].

² CAL. FISH & GAME COMM'N, MEETING AGENDA: FEBRUARY 12-13, 2025, <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=227909>.

RICK ROBERTI
PRESIDENT
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FEEDER COUNCIL CHAIR
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ANTHONY STORNETTA
SECOND VICE PRESIDENT
ATASCADERO

JACK HOEKSTRA
FEEDER COUNCIL VICECHAIR
CALIPATRIA

the impacts coyotes have upon animal agriculture. More importantly, CCA had no *constructive* notice that the Committee was considering whether to recommend regulatory limits on the take of coyotes. While CCA routinely monitors agendas of the Commission and its committees, notice provided in the January 15 agenda was insufficient to notify stakeholders, including CCA, that limits on the take of coyotes were under consideration.

a. The Wildlife Resources Committee’s notice was insufficient to “give the average person enough information to decide whether to attend or participate in the meeting”

Commission committees operate in accordance with the Bagley-Keene Open Meeting Act,³ which requires state bodies to provide “notice of a meeting that...shall include a specific agenda for the meeting.”⁴ The Office of the Attorney General has interpreted this requirement to mean that an agenda should be characterized by “precise formulation or accurate restriction” and be “free from such ambiguity as results from careless lack of precision or from omission of pertinent matter.”⁵ The California Department of Justice has summarized this requirement by stating that “it must give the average person enough information to decide whether to attend or participate in the meeting.”⁶ While interested stakeholders could perhaps have referred to prior Wildlife Resources Committee hearings or contacted Commission staff to ascertain the nature of the agenda item, the requirements of the Bagley-Keene Open Meeting Act were “intended to nullify the need for such type of guesswork or further inquiry on the part of the interested public.”⁷

The January 15 agenda of the Wildlife Resources Committee provided, in relevant part, that the Committee would undertake “Discussion and potential recommendations for change to the take of nongame mammals regulations.”⁸ From this description it was unclear whether “recommendations for change” would be substantive or not; which regulatory codes might be considered (14 C.C.R. §§ 472-479 all deal with “take of nongame mammals”); which of the numerous classes or species of non-game mammals designated under California law⁹ might be implicated; or which direction the Committee might recommend the Commission take (*e.g.*, study, broaden, or curtail take).

³ CAL. GOV’T CODE § 11121(b); CAL. FISH & GAME COMM’N, *About the California Fish and Game Commission*, <https://fgc.ca.gov/About> (last visited Jan. 27, 2025).

⁴ CAL. GOV’T CODE § 11125(b).

⁵ 67 Ops.Cal.Atty.Gen. 84 (1984) (citing *Specific*, WEBSTER’S THIRD NEW INTERNATIONAL DICTIONARY, UNABRIDGED (1961)).

⁶ CAL. DEP’T OF JUST., BAGLEY-KEENE OPEN MEETING ACT GUIDE 13 (2024).

⁷ 67 Ops.Cal.Atty.Gen. 84 (1984).

⁸ CAL. FISH & GAME COMM’N WILDLIFE RES. COMM., MEETING AGENDA: JANUARY 15, 2025; 9:00 A.M., <http://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=227462>.

⁹ The California Fish and Game Code defines “non-game mammals” broadly as “A mammal occurring naturally in California that is not a game mammal, exotic game mammal, fully protected mammal, or fur-bearing mammal” (CAL. FISH & GAME CODE § 4150(a)), even including some house cats (*Id.* at § 4151). California regulations implementing the state’s nongame mammal statutes specifically mention numerous classes and species of animals, including weasels, skunks, opossums, moles, rodents, fallow deer, sambar deer, sika deer, axis deer, aoudad goats, mouflon goats, tahr goats, feral goats, nutria, and bobcats (14 C.C.R. §§ 472-479).

Even extraneous reference to the meeting binder – which, again, is not contemplated under Bagley-Keene’s notice requirements – would not have provided “the average person enough information to decide whether to attend or participate in the meeting,” as the proposed Committee recommendation was ambiguously listed as “The Wildlife Resources Committee recommends that the Commission approve a future rulemaking to amend Section 472 to: _____.”

Nothing in the Wildlife Resources Committee’s January 15 agenda or meeting binder suggested that the Committee was considering a recommendation that the Commission curtail ranchers’ ability to manage coyote populations to prevent depredations. Review of the January 15 meeting video suggests that CCA was not the only entity puzzled by the ambiguous agenda items, with one attendee asking “Which problem are we solving? I have no idea why this is on the agenda”¹⁰ and a Committee Co-Chair openly wondering “how did [the agenda item] even get generated?”¹¹

Further review of the Committee hearing makes clear the broad matter of “take of nongame mammals” was not the intended focus of the hearing, but rather that the discussion was intended to more narrowly target take of coyotes, in particular. While other non-game mammals were incidentally referenced during the Committee’s two-hour discussion, the vast majority of the discussion was centered on coyotes specifically. Indeed, statements by Department and Commission personnel revealed the Committee’s singular focus on take of *coyotes*, with Department staff noting that “This started with...a presentation...in this forum...over a year ago on coyotes. Coyotes and trapping, period,”¹² and a Committee Co-Chair responding “You’re right, it started with coyotes.”¹³

Given the ambiguity in the agenda’s notice and the fact that the agenda lacked “accurate restriction” reflecting the intended focus on take of coyotes, CCA respectfully requests that the issue be re-referred to the Wildlife Resources Committee with instructions to provide clearer notice ahead of a future hearing of this matter in that Committee.

b. Re-referral is consistent with the purposes of the Bagley-Keene Act and the Commission’s policies

Even if the Commission does not believe that the notice provided in the January 15 agenda of the Wildlife Resources Committee was insufficient, there can be no doubt that re-referring the matter (with clearer notice) for consideration at the Committee’s May 15 hearing would better effectuate the intentions of the Bagley-Keene Open Meeting Act and of the Commission’s own stated policy.

An agenda item plainly stating that the Committee is considering ‘recommending rulemaking limiting the take of coyotes under 14 CCR § 472’ would doubtless give impacted stakeholders “enough information to decide whether to attend or participate in the meeting” in accordance with the Department of Justice’s interpretation of the requirements of Bagley-Keene.

¹⁰ January 15, 2025 WRC Meeting, *supra* note 1, at 4:35:20.

¹¹ *Id.* at 4:37:09 (questioning from Wildlife Resources Committee Co-Chair Commissioner Darius Anderson).

¹² *Id.* at 4:54:21 (statement by CDFW’s Wildlife and Fisheries Division Deputy Director Chad Dibble).

¹³ *Id.* at 4:55:07 (statement of Wildlife Resources Committee Co-Chair, Commission Vice President Erika Zavaleta).

Moreover, re-referral to the Wildlife Resources Committee would effectuate the Commission’s stated goal of its committees to “allow presentations and discussions on regulatory proposals that allow greater time and detail than what is possible at full Commission meetings.”¹⁴ As one participant at the January 15 meeting of the Wildlife Resources Committee noted, “this kind of snuck in under the radar...if people really knew what was being discussed in this room,” participation would have increased “ten-fold.”¹⁵ Rather than inviting those previously-unaware stakeholders to air their concerns with the proposal for the first time during busy meetings of the full Commission – during which strict time limits will almost certainly be necessary – the Commission ought to instead re-refer the matter to the Wildlife Resources Committee to ensure a more thorough discussion that engages all relevant stakeholders. Such re-referral will ensure that concerns are fully voiced and heard ahead of a future hearing by the full Commission and may result in more nuanced referral to the full Commission at a later time.

II. Re-referral will enable adequate participation of Committee Co-Chairs and improve the Committee’s deliberative process

At the time the motion was made to “recommend[] that the Commission approve a future rulemaking to amend Section 472 to remove coyotes,” only one Committee member – Commissioner Zavaleta – was present and voting. While this is permissible under regulations governing the Commission,¹⁶ it hinders the Committee’s purpose of fostering “discussions on regulatory proposals that allow greater...detail than what is possible at full Commission meetings.”

As noted by Commissioner Zavaleta, the discussion of curtailing coyote take under Section 472 originally “arose before [Commissioner Anderson] joined the Committee,”¹⁷ and thus the January 15 hearing was Commissioner Anderson’s first opportunity to substantively engage with the issue. Unfortunately, Commissioner Anderson had to leave the January 15 meeting around 3:30 p.m., approximately two hours before the meeting concluded and in the midst of the ongoing discussion regarding take of coyotes under Section 472.

Commissioner Anderson’s absence deprived him of the ability to participate in the Committee’s deliberative process and deprived his Co-Chair of his insights and perspectives as the motion was crafted and voted upon. Importantly, Commissioner Anderson had expressed skepticism about curtailing non-depredation take of coyotes prior to exiting the meeting and had specifically spoken to ranchers’ concerns about the need to proactively manage coyote populations to prevent livestock depredations – a vital contribution given that organizations representing livestock producers lacked actual or constructive notice that the Committee was vetting a proposal to limit such coyote management.

¹⁴ CAL. FISH & GAME COMM’N, *About the California Fish and Game Commission*, <https://fgc.ca.gov/About> (last visited Jan. 27, 2025).

¹⁵ January 15, 2025 WRC Meeting, *supra* note 1, at 5:11:18 (comments by Bill Gaines).

¹⁶ 14 C.C.R. § 665(a)(1)(B) (“Committee meetings require a quorum of at least one appointed member be present to conduct a meeting.”); *Id.* at § 665(a)(5)(A) (“A motion shall pass or fail only upon a majority vote of the membership present and voting.”).

¹⁷ January 15, 2025 WRC Meeting, *supra* note 1, at 4:36:52.

To promote the Commission's purpose of fostering fulsome discussion and deliberation of regulatory matters at the Committee level, CCA respectfully requests that this matter be re-referred to the Wildlife Resources Subcommittee to ensure full and equal participation by both of the Committee's co-chairs.

Conclusion

The California Cattlemen's Association appreciates the opportunity to address the Commission on this matter. While we will continue to advocate for ranchers' ability to protect their herds from coyotes in whichever venue the Commission deems appropriate, it is our sincere hope that the Commission will allow for continued discussion of this topic before the Wildlife Resources Committee so that ranchers' perspectives and concerns can be fully aired prior to the full Commission consideration (and so that such perspective might inform the deliberations of, and any referral made by, the Committee).

Sincerely,

A handwritten signature in black ink, appearing to read "Kirk Wilbur", with a long horizontal flourish extending to the right.

Kirk Wilbur
Vice President of Government Affairs

Submitted via email to fgc@fgc.ca.gov

January 30, 2025

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

RE: Committee and Department Reports: Wildlife Resources Committee (Agenda Item 17(B))

President Murray and Commissioners:

I am writing to request that the issue of Section 472 regulations change be either tabled permanently or sent back to the Wildlife Resource Committee for future discussion.

As a frequent participant in both Commission and WRC meetings, I am aware that “nongame” animal issues have been on the agenda for more than a year. However, also as a frequent participant in Commission meetings and those hosted by the Department with Commission Staff presenting, the specificity of what came to light in the January WRC was not shared in the prior 15 months. The complaint that initiated this discussion focused on *indiscriminate take* of nongame species with specific attention to trapping and killing animals authorized by Section 4152. Trapping hundreds or thousands of nongame animals which are then disposed of *might meet the definition of indiscriminate take*. Without public notice to indicate that a Commissioner or that the Commission Staff had specific intent to modify Section 472, the public did not have any indication that the discussion would quickly lead to a discussion affecting the legal and purposeful hunting of coyotes.

Hunting, with purpose and intention, is not an indiscriminate take. The regulations under Section 472 allow the hunting of species which are abundant. Given the restrictions on method of take, legal harvest under Section 472 is not indiscriminate. Furthermore, as noted in the meeting documents themselves, modification of Section 472 is expected to have little impact on nongame animal hunting or harvest.

From the January WRC meeting documents: *“In addition to potential enforcement challenges, there is limited evidence that significant take of nongame mammals outside of depredation is occurring and there is little to no recent data on population trends for nongame mammals.”*

Not only was the communication of intended regulation change ambiguous at best, the concept of expending Commission, Department and stakeholder resources on this issue is of greatest concern. For most of the last 6-12 months every meeting has included a discussion about a need to rank, prioritize and schedule issues according to impact and necessity. The Commission Staff who commented on this topic during the WRC indicated an unusual bias, in spite of a lack of resources already constraining the amount of work they take on. In the next 6 to 24 months, the Dept and Commission have the following topics and subsequent regulatory changes to consider: Black Bear Management and Conservation, Deer

Submitted via email to fgc@fgc.ca.gov

Management and Conservation, Bobcat Management and Conservation, continuing updates to Elk Management and Conservation, Sierra Nevada Bighorn Sheep recovery, an escalating crisis in mountain lion abundance and behavior, and a 10-year old Wolf Management plan which is on the cusp of obsolescence as that population enters a phase of rapid growth. The stakeholder communities you serve would put most, if not all, of the aforementioned plans and updates ahead of changing Section 472 when "there is limited evidence that significant take of nongame mammals outside of depredation is occurring".

With regards to the desired consistency in how we treat wildlife and the regulations involving hunting, harvest, conservation and wildlife management: I too would like to see a more principled and consistent approach to definitions, laws, regulations and opportunity. Achieving consistency would require an overhaul of both statutes and regulations. The proposed change in Section 472, for the expressed purpose of creating consistency, does nothing to cure the tremendous disparity in how California's terrestrial predator species are managed.

Please dismiss the current recommendation from the Wildlife Resource Committee. The issue is complex, its practical value vs. resource demand is questionable, and robust discussion and feedback from all stakeholders should be considered in the Wildlife Resource Committee before going to the full Commission.

Sincerely,

Mike Costello & Charles Whitwam
HOWL for Wildlife



From: Steven Childs [REDACTED]
Sent: Wednesday, January 15, 2025 8:58 AM
To: FGC
Subject: WRC Item 5 Nongame Mammals OPPOSE CHANGES
Attachments: image.png

Wildlife Resources Committee January 15, 2025 Meeting

Item 5. Take of nongame mammals

Discussion and potential recommendations for change to the take of nongame mammals regulations.

Wildlife Resource Committee

With limited budgets and resources, wildlife management your agency must prioritize actions that have the most significant impact on conservation and public safety. Focusing on changes in the take of nongame mammals, such as coyotes, is not an appropriate use of these limited resources. Coyotes are a highly adaptable species with a stable population, and there is no current evidence indicating that their numbers are in decline or that reducing their take would benefit the ecosystem or human communities.

Reasons to Oppose Changes in Coyote Take Regulations:

Increasing Human-Wildlife Conflicts: CDFW records indicate a steady increase in human-wildlife conflicts since 2008. Over 99% of these conflicts occur in cities and at the urban-wildland interface. It has been well documented that urban management, once consistent throughout the state of California has shifted toward coexistence as advocated by several advocacy groups. Coincidentally or not, human wildlife conflict over this same time period has dramatically increased. This suggests that the lack of take contributes to increases in human wildlife conflict.

Unknown Levels of Current Take: The state does not have accurate data on the number of people hunting coyotes or the actual take levels. Without this information, it is difficult to justify any changes to take regulations.

Adaptability of Coyotes: Coyotes are omnivorous generalists that thrive in a wide range of environments. They can survive and reproduce in both urban and rural settings, making their population resilient to changes in management practices.

Lack of Evidence for Population Decline: There is no substantial evidence to suggest that coyote populations are declining or that increased protection is necessary. Current populations appear stable, and changes to take regulations are not warranted.

Encouragement of Bold Behavior: In urban areas, where coyote take is minimal, there has been an observed increase in bold behavior, leading to more frequent human-wildlife conflicts. Reducing take could exacerbate this issue, increasing the likelihood of conflicts.

No Statewide Management Plan: The state currently lacks a comprehensive urban and wild coyote management plan. Implementing changes without such a plan could lead to inconsistent management practices and ineffective conflict mitigation.

The state should not consider any changes to current coyote take regulations without first conducting a thorough assessment to understand the current levels of take, how take influences coyote behavior, and the necessity of a statewide urban and wild coyote management plan. This comprehensive approach would ensure that any regulatory changes are grounded in scientific evidence and practical management needs.

I have attached a graph showing CDFW Human Wildlife Conflict Data specifically for coyotes. It shows a steady increase in conflict over time. It seems the idea of focusing on hunter take rather than dealing with the public safety issues surrounding urban coyotes would not be the best use of resources.

Thank you.

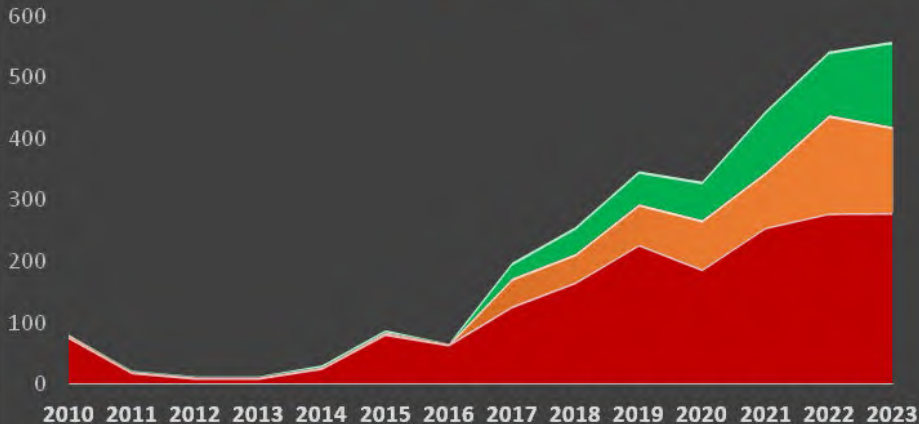
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Steven Childs



Number of Incidents by Behavior

■ Depredation ■ Nuisance ■ Sighting



OPPOSE Item 5, NO CHANGES FOR TAKE OF NON GAME MAMMALS (COYOTES)

From Anna Veach [REDACTED]
Date Wed 01/15/2025 10:35 AM
To FGC <FGC@fgc.ca.gov>

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There is no current evidence indicating that coyote numbers are in decline or that reducing their take would benefit the ecosystem or human communities.

Increasing Human-Wildlife Conflicts: CDFW records indicate a steady increase in human-wildlife conflicts since 2008. Over 98% of these conflicts occur in cities and at the urban wildlife interface. Coincidentally or not, human wildlife conflict over the same time period has dramatically increased. This suggests that the lack of take contributes to increases in human wildlife conflicts.

There is no substantial evidence to suggest that coyote populations are declining or that increased protection is necessary. Currently populations appear stable, and changes to take regulations are not warranted.

In urban areas, where coyote take is minimal, there has been an observed increase in bold behavior, leading to more frequent human-wildlife conflicts. Reducing the take would exacerbate this issue, increasing the likelihood of conflicts.

The state currently lacks a coyote management plan. Implementing changes without a plan would lead to inconsistent management practices and ineffective conflict mitigation.

Please do not consider changes to take regulations without a thorough assessment to understand the current levels of take, how take influences coyote behavior and the necessity of a statewide urban and wild coyote management plan. This comprehensive approach would ensure that any regulatory changes are grounded in scientific evidence and practical management needs.

Best
Anna Veach

Item 5, a proposed amendment to California Code of Regulations, Title 14, Section 472

From Lisa Lange [REDACTED]
Date Tue 01/14/2025 01:18 PM
To FGC <FGC@fgc.ca.gov>

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Dear Commissioners,

As a native Californian, I am urging you to strengthen protection for ALL native carnivores. The fact that coyotes, foxes, badgers, skunks and raccoons are without the protections rightly afforded other animals like gray squirrels and elk (to name a few) is random and goes against all you're trying to accomplish, and all we as Californians believe our wildlife deserves.

As you know, currently non-game animals can be killed in any way in any numbers by, for example, ranchers. This has led to horrific cruelty and the taking of wildlife we all hold in common for the interests of a few. The least we can do for these animals is increase accountability through requiring anyone who wants to kill an animal for "damage to property" will first have to prove the need to do so through a permitting process. It is truly the very least they should be made to do. Of course, this added protection will better allow you to keep track of populations of native animals, something you're unable to do now with the willy nilly approach to 'wildlife control.'

Thank you for making the necessary amendments.

Lisa Lange
Pasadena, CA

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