

Committee Staff Summary for May 15, 2025 WRC

4. Take of Coyotes**Today's Item****Information** ☒**Action** ☐

Discussion and potential recommendations for changes to regulations regarding the take of coyotes.

Summary of Previous/Future Actions

- | | |
|---|--------------------------|
| • Discussions regarding take of all nongame mammals | 2023-2024; WRC |
| • Discussion and recommendation on take of nongame mammals regarding coyotes only | January 15, 2025; WRC |
| • Commission referred take of coyotes only back to WRC | February 12-13, 2025 |
| • Today's discussion | May 15, 2025; WRC |

Background

In February 2025, the Commission received a recommendation from the Wildlife Resources Committee (WRC) to remove coyotes from the broad take provisions of Section 472 of Title 14, California Code of Regulations, while maintaining coyote sport hunting opportunities. The proposal was developed after approximately two years of committee discussions about the take of nongame mammals, including coyotes, which was initiated based on years of public comment expressing concern with the unlimited take of coyotes and other nongame species. Ultimately, the WRC recommendation narrowly addressed only the unlimited take of coyotes while ensuring recreational hunting and effective management could continue, whether in an urban or rural setting.

At the February meeting, the Commission received many requests from stakeholders and the public to refer the topic back to WRC for more dialogue. The Commission (including the WRC co-chairs) agreed and placed the topic on today's agenda for further discussion.

WRC staff would like to clarify that *not under consideration* today is proposing new regulations related to coyote depredation permits or reclassifying coyotes as a game species. Depredation laws already exist and are managed by the Department. The authority to categorize mammal species (e.g., nongame mammals, big game species, exotic game mammals) rests with the California State Legislature, and any effort to change that status would need be taken to the legislature.

Today's goals are twofold. First, is to ensure greater understanding of the existing laws, regulations and policies governing coyote management, and the needs of the various communities, from cities to rural communities and individual homeowners to ranchers. Staff will present an introduction to the statutory, regulatory and policy landscape, and relevant issues (see exhibits 1 through 4). Then, from what is hopefully a common understanding of the law and policy context, the second goal is to engage in joint information-sharing to affirm the problem(s) to be addressed. It is after the first two goals are achieved that a constructive and pragmatic dialogue can begin to identify and discuss options to best meet a range of needs and objectives. Ultimately, WRC is seeking to engage stakeholders and the public in creative

Committee Staff Summary for May 15, 2025 WRC

problem-solving to improve coyote management and address a current inconsistency between Commission regulation and policy.

Significant Public Comments

1. The Modoc and Siskiyou county boards of supervisors and a Tehama County supervisor oppose removing coyotes from Section 472, state that their counties are rural with large areas of agriculture and ranching and, therefore, face different issues than more urban locales, that grazing can have significant benefits, and that coyotes are abundant. (Exhibit 5)
2. A coalition of the California Farm Bureau, thirty-two county Farm Bureaus, the Rural County Representatives of California, and the California Wool Growers Association oppose removing coyotes from Section 472, coyote bag limits, and a coyote hunting season. They express concerns that farmers and ranchers will not be able to maintain the ability to protect their livestock and crops. (Exhibit 6)
3. The California Cattlemen's Association and Siskiyou County Cattlemen's Association oppose removing coyotes from Section 472, recount the harms that coyotes can cause to California's ranching community, urge any regulatory changes to be narrowly focused, take issue with the use of the word "indiscriminate" for coyote take, state that the current regulations are consistent with the Commission's *Terrestrial Predator Policy*, and maintain that coyotes are abundant. (Exhibit 7)
4. Project Coyote supports removing coyotes from Section 472. They cite scientific studies showing that lethal control of coyotes is ineffective at controlling populations or reducing conflict, describe the crucial role that coyotes play in ecosystems, state that the current regulations conflict with the Commission's *Terrestrial Predator Policy*, urge the Commission to set bag and possession limits for coyotes, and cite survey results showing majority public support for limiting the killing of wild carnivores, including coyotes. They also detail suggestions for regulatory changes that could allow lethal and less-than-lethal methods of take while prohibiting unlimited take. (Exhibit 8)
5. Citizens for Los Angeles Wildlife (CLAW) explains that the best available science shows that indiscriminately killing coyotes is not only ineffective, but may lead to coyote population growth and increased human-wildlife conflict. They point out that coyotes are native to California and that other states have limitations on coyote take. (Exhibit 9)
6. Humane World for Animals supports removing coyotes from Section 472. They emphasize the inconsistency of current regulations with the Commission's *Terrestrial Predator Policy*, scientific findings that random killing of coyotes can increase coyote numbers and conflicts, the ecological importance of coyotes, and growing positive public attitudes towards coyotes and nonconsumptive wildlife users. (Exhibit 10)
7. Approximately 135 commenters support changes to coyote regulations. Reasons include that coyotes are important components of ecosystems, a desire for coexistence, lack of effectiveness of indiscriminate coyote killing, and public support for limiting predator take (three sample emails in Exhibit 11).

Committee Staff Summary for May 15, 2025 WRC

8. Approximately 200 commenters oppose changes to coyote take regulations. Reasons include protecting public safety, livestock depredation, and stable or increasing coyote populations (four sample emails in Exhibit 12).

Recommendation

Commission staff: Focus today's discussion on the two primary goals; determine if additional discussion should be scheduled for a future meeting.

Exhibits

1. [Staff presentation](#) (to be provided separately)
2. [Three Sections of California Fish and Game Code](#) Relevant to the Take of Nongame Mammals, extracted January 2, 2024
3. [Section 472 of Title 14 of the California Code of Regulations](#), Relevant to the Take of Nongame Mammals, extracted January 2, 2024
4. [Commission Policies Directly Related to the Take of Nongame Mammals](#), dated January 2, 2024
5. [Letters from Ned Coe, Chair, Modoc County Board of Supervisors; Nancy Ogren, Chair, Siskiyou County Board of Supervisors; and Supervisor Matthew C. Hansen, Tehama County District 4](#), received April 26, 2025 through April 30, 2025
6. [Letters from California Farm Bureau, thirty-two county Farm Bureaus, the Rural County Representatives of California, the California Wool Growers Association, Sean Curtis, President, Modoc County Farm Bureau; and Phillip Esnoz, President, California Wool Growers Association](#), received April 30, 2025 through May 1, 2025
7. [Letters from Kirk Wilbur, Vice President of Government Affairs, California Cattlemen's Association and Tim Nielsen, President, Siskiyou County Cattlemen's Association](#), received May 2, 2025
8. [Letters from Camilla Fox, Founder & Executive Director, and David Parsons, Science & Ethics Advisory Board Member, Project Coyote](#), received February 7, 2025 and April 28, 2025
9. [Letter from Tony Tucci, Chair, Citizens for Los Angeles Wildlife](#), received May 2, 2025
10. [Letter from Jenny Berg, California State Director, Humane World for Animals](#), received May 2, 2025
11. [Samples messages from Philip Steir, Sherry Simmons, and Keli Hendricks](#), received May 1, 2025 through May 2, 2025
12. [Sample messages from Katherine Kelly, Kevin Kramer, Bob Maloney, and Carrie Anne P.](#), received April 28, 2025 through May 1, 2025

Committee Direction/Recommendation (N/A)

Three Sections of California Fish and Game Code Relevant to the Take of Nongame Mammals

Extracted by California Fish and Game Commission staff on January 2, 2024

To help facilitate conversation, this document provides extracts from the California Fish and Game Code related to the take of nongame mammals for ease of reference. Footnotes are added for convenience and are not part of the official statutes, nor are they a complete recapitulation of the law.

Please refer to complete statutory text at <https://leginfo.legislature.ca.gov/faces/home.xhtml> for a more comprehensive understanding of the particular code section(s).

Section 4152. Taking of Nongame Mammals Found Injuring Crops or Property

- (a) Except as provided in Section 4005, nongame mammals and black-tailed jackrabbits, muskrats, subspecies of red fox that are not the native Sierra Nevada red fox (*Vulpes vulpes necator*), and red fox squirrels that are found to be injuring growing crops or other property may be taken at any time or in any manner in accordance with this code and regulations adopted pursuant to this code by the owner or tenant of the premises or employees and agents in immediate possession of written permission from the owner or tenant thereof. They may also be taken by officers or employees of the Department of Food and Agriculture or by federal, county, or city officers or employees when acting in their official capacities pursuant to the Food and Agricultural Code pertaining to pests, or pursuant to Article 6 (commencing with Section 6021) of Chapter 9 of Part 1 of Division 4 of the Food and Agricultural Code. Persons taking mammals in accordance with this section are exempt from Section 30071, except when providing trapping services for a fee. Raw furs, as defined in Section 4005, that are taken under this section, shall not be sold.
- (b) Traps used pursuant to this section shall be inspected and all animals in the traps shall be removed at least once daily. The inspection and removal shall be done by the person who sets the trap or the owner of the land where the trap is set or an agent of either.
- (c) This section does not apply to bobcats.

Section 4180. Taking of Fur-Bearing Mammals Injuring Property

- (a) Except as provided for in Section 4005, fur-bearing mammals that are injuring property may be taken at any time and in any manner in accordance with this code or regulations made pursuant to this code. Raw furs, as defined in Section 4005, that are taken under this section, shall not be sold.
- (b) Traps used pursuant to this section shall be inspected and all animals in the traps shall be removed at least once daily. The inspection and removal shall be done by the person who sets the trap or the owner of the land where the trap is set or an agent of either.

¹ Requires a license or entitlement for the taking of birds or mammals.

Section 4005. Persons Required to Procure Trapping Licenses; Qualifications

- (a) Except as otherwise provided in this section, every person who traps fur-bearing mammals or nongame mammals, designated by the commission, shall procure a trapping license. Raw fur of fur-bearing and nongame mammals may not be sold. For purposes of this article, “raw fur” means any fur, pelt, or skin that has not been tanned or cured, except that salt-cured or sun-cured pelts are raw furs.
- (b) The department shall develop standards that are necessary to ensure the competence and proficiency of applicants for a trapping license. A person shall not be issued a license until the person has passed a test of their knowledge and skill in this field.
- (c) Persons trapping mammals in accordance with Section 4152 or 4180 are not required to procure a trapping license except when providing trapping services for profit.
- (d) No raw furs taken by persons providing trapping services for profit may be sold.
- (e) The license requirement imposed by this section does not apply to any of the following:
 - (1) Officers or employees of federal, county, or city agencies or the department, when acting in their official capacities, or officers or employees of the Department of Food and Agriculture when acting pursuant to the Food and Agricultural Code pertaining to pests or pursuant to Article 6 (commencing with Section 6021) of Chapter 9 of Part 1 of Division 4 of the Food and Agricultural Code.
 - (2) Structural pest control operators licensed pursuant to Chapter 14 (commencing with Section 8500) of Division 3 of the Business and Professions Code, when trapping rats, mice, voles, moles, or gophers.
 - (3) Persons and businesses licensed or certified by the Department of Pesticide Regulation pursuant to Chapter 4 (commencing with Section 11701) and Chapter 8 (commencing with Section 12201) of Division 6 of, and Chapter 3.6, (commencing with Section 14151) of Division 7 of, the Food and Agricultural Code, when trapping rats, mice, voles, moles, or gophers.
- (f) Except for species that are listed pursuant to Chapter 1.5 (commencing with Section 2050)² of Division 3 or Chapter 8 (commencing with Section 4700)³, nothing in this code or regulations adopted pursuant thereto shall prevent or prohibit a person from trapping any of the following animals:
 - (1) Gophers.
 - (2) House mice.
 - (3) Moles.
 - (4) Rats.
 - (5) Voles.

² Refers to the California Endangered Species Act.

³ Refers to fully protected animals.

Section 472 of Title 14 of the California Code of Regulations, Relevant to the Take of Nongame Mammals

Extracted by California Fish and Game Commission staff on January 2, 2024

To help facilitate conversation, this document provides Section 472 of Title 14 of the California Code of Regulations; Title 14 is where regulations promulgated by the California Fish and Game Commission may be found. Footnotes are added for convenience and are not part of the regulation or referenced statutes, nor are they a complete recapitulation of the law.

Please refer to complete regulatory text (<https://govt.westlaw.com/calregs/>) or statutory text (<https://leginfo.ca.gov/faces/home.xhtml>) for a more comprehensive understanding of the particular section(s).

Section 472. General Provisions.

Except as otherwise provided in Sections 478¹, 485², and subsections (a) through (d) below, nongame birds and mammals may not be taken.

- (a) The following nongame birds and mammals may be taken at any time of the year and in any number except as prohibited in Chapter 6: English sparrow, starling, domestic pigeon (*Columba livia*) except as prohibited in Fish and Game Code section 3680³, coyote, weasels, skunks, opossum, moles and rodents (excluding tree and flying squirrels, and those listed as furbearers, endangered or threatened species).
- (b) Fallow, sambar, sika, and axis deer, of either sex, may be taken concurrently with the general deer season and on properties where an authorized deer, elk, or pronghorn antelope season is open. There is no bag or possession limit for deer taken pursuant to this subsection.
 - (1) It shall be unlawful to take any deer pursuant to this subsection without a valid hunting license in possession, but no tag, stamp, or additional endorsement of any kind is required.
 - (2) It shall be unlawful to detach or remove only the head, hide, or antlers of any deer taken pursuant to this subsection, or to leave through carelessness or neglect any portion of the flesh normally eaten by humans to go to waste.
- (c) Aoudad, mouflon, tahr, and feral goats may be taken all year.
- (d) American crows (*Corvus brachyrhynchos*)
 - (1) May be taken only under the provisions of Section 485 and by landowners or tenants, or by persons authorized in writing by such landowners or tenants, when American crows are committing or about to commit depredations upon ornamental or shade trees, agricultural crops, livestock, or wildlife, or when concentrated in such numbers and manner as to constitute a health hazard or other nuisance. Persons authorized by landowners or tenants to take American crows shall keep such written authorization in their possession

¹ Prohibitions on take of bobcats.

² Regulates the take of crows.

³ Refers to racing pigeons.

when taking, transporting or possessing American crows. American crows may be taken only on the lands where depredations are occurring or where they constitute a health hazard or nuisance. If required by Federal regulations, landowners or tenants shall obtain a Federal migratory bird depredation permit before taking any American crows or authorizing any other person to take them.

- (2) American crows may be taken under the provisions of this subsection only by firearm, bow and arrow, falconry or by toxicants by the Department of Food and Agriculture for the specific purpose of taking depredating crows. Toxicants can be used for taking crows only under the supervision of employees or officers of the Department of Food and Agriculture or federal or county pest control officers or employees acting in their official capacities and possessing a qualified applicator certificate issued pursuant to sections 14151-14155 of the Food and Agriculture Code. Such toxicants must be applied according to their label requirements developed pursuant to sections 6151-6301, Title 3, California Code of Regulations.

- (e) Pursuant to Fish and Game Code Section 2003⁴, it is unlawful to offer any prize or other inducement as a reward for the taking of nongame mammals in an individual contest, tournament, or derby.

⁴ Refers to the offering of prizes or other inducements for the taking of wildlife.

California Fish and Game Commission

Commission Policies Directly Related to the Take of Nongame Mammals

January 2, 2024

Depredation Control

It is the policy of the Fish and Game Commission that:

All wildlife species shall be maintained in harmony with available habitat whenever possible. In the event that some birds or mammals may cause injury or damage to private property, depredation control methods directed toward offending animals may be implemented. Should such depredation be upon wildlife species being intensively managed, the Department may institute appropriate depredation control methods directed towards the offending animals.

Terrestrial Predator Policy

It is the policy of the Fish and Game Commission that:

- I. For the purposes of this policy, terrestrial predators are defined as all native wildlife species in the Order Carnivora, except those in the Family Otariidae (seals, sea lions), the Family Phocidae (true seals), and sea otters (*Enhydra lutris*).
- II. Pursuant to the objectives set forth in Section 1801 of Fish and Game Code, the Commission acknowledges that native terrestrial predators are an integral part of California's natural wildlife and possess intrinsic, biological, historical, and cultural value, which benefit society and ecosystems. The Commission shall promote the ecological, scientific, aesthetic, recreational, and educational value of native terrestrial predators in the context of ecosystem-based management, while minimizing adverse impacts on wildlife and reducing conflicts that result in adverse impacts to humans, including health and safety, private property, agriculture, and other public and private economic impacts.
- III. The Commission further recognizes that sustainable conservation and management strategies are necessary to encourage the coexistence of humans and wildlife. It is, therefore, the policy and practice of the Fish and Game Commission that:
 - A. Existing native terrestrial predator communities and their habitats are monitored, maintained, restored, and/or enhanced using the best available science. The department shall protect and conserve predator populations.
 - B. Native terrestrial predator management shall be consistent with the goals and objectives of existing management and conservation plans. Management strategies shall recognize the ecological interactions between predators and other wildlife species and consider all available management tools, best available science, affected habitat, species, and ecosystems and other factors. The department shall provide consumptive and non-consumptive recreational opportunities. The recreational take of native terrestrial predator species shall be managed in a way that ensures sustainable populations of predator and prey are maintained.

- C. Human-predator conflict resolution shall rely on management strategies that avoid and reduce conflict that results in adverse impacts to human health and safety, private property, agriculture, and public and private economic impacts. Efforts should be made to minimize habituation of predators especially where it is leading to conflict. Human safety shall be considered a priority. Management decisions regarding human-predator conflicts shall evaluate and consider various forms of lethal and nonlethal controls that are efficacious, humane, feasible and in compliance with all applicable state and federal laws and regulations. A diverse set of tools is necessary to avoid, reduce, and manage conflict. To ensure long-term conservation of predators and co-existence with humans and wildlife, all legal tools shall be considered when managing to address conflicts.

From: Tiffany Martinez <tiffanymartinez@co.modoc.ca.us>
Sent: Tuesday, April 29, 2025 1:51 PM
To: FGC <FGC@fgc.ca.gov>
Cc: Ned Coe <nedcoe@co.modoc.ca.us>
Subject: Wildlife Resources Committee - Agenda Item 4 Comment Letter

You don't often get email from tiffanymartinez@co.modoc.ca.us. [Learn why this is important](#)

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Please see the attached comment letter for agenda item 4 of the May 15, 2025, Wildlife Resources Committee.

Feel free to reach out with any questions or concerns.

Tiffany Martinez

*Clerk of the Board/Assistant County Administrative Officer
Modoc County
204 South Court Street
Alturas, CA 96101
Office: (530) 233-6201
tiffanymartinez@co.modoc.ca.us*

“Probably the most dangerous phrase that anyone could use in the world today is that dreadful one: "But we have always done it that way.”

Grace Hopper - Computer Scientist

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**Modoc County
Board of Supervisors**

Established in 1874



204 S. Court Street
Alturas, California 96101

Phone: (530) 233-6201

April 22, 2025

Wildlife Resources Committee
California Fish and Game Commission
P.O. Box 944209
Sacramento, CA 94244-2090

Via email to fgc@fgc.ca.gov

**RE: Potential Recommendations for Changes to Regulations Regarding the Take of
Coyotes (Agenda Item 4)**

Dear Committee Co-Chairs Commissioners Zavaleta and Anderson:

The Modoc County Board of Supervisors appreciates the California Fish and Wildlife Commission referring the proposed revisions to 14 C.C.R. Section 472 regarding potential recommendations for changes to regulations regarding the take of coyotes, back to the Wildlife Resources Committee. Additionally, the Board of Supervisors appreciates the improved transparency of the agenda item on the Wildlife Resources Committee agenda to allow the public the ability to comment on the proposed recommendation.

The Modoc County Board of Supervisors would like to submit this letter of opposition regarding item 4 on the May 15, 2025, Wildlife Resources Committee agenda, which would recommend that coyotes be made a game animal.

Modoc County and many other Northern California counties differ greatly from the more urban areas of California and should not be treated the same in a one-size-fits-all policy for any wildlife issue. In the staff report from the February 12-13, 2025, Wildlife Resources Committee meeting, it stated, "Participants asserted that indiscriminate take, disguised as depredation, has occurred in cities like Torrance and Anaheim." If this statement is the locus of the item being placed before the Committee and Commission, there is further evidence that this issue appears to be emotional rather than a scientifically motivated discussion.

There is no empirical evidence that the coyote population is threatened in any sense. Coyote predation in Modoc County appears to be steady and increasing, according to our livestock producers, a position endorsed by APHIS's Wildlife Services. Furthermore, the abundance of coyotes throughout California demonstrates the need for improved predator control and fewer regulations to allow for public safety and vital economic agricultural activity in rural areas of California. Additionally, presentations from the September 17, 2020, Wildlife Resources

Committee meeting demonstrate that coyotes in urban environments are becoming more volatile due to human intervention through feeding and treatment of sick coyotes. Urban interaction and rural interaction with coyotes are drastically different and should not be treated the same.

The County of Modoc is geographically the tenth largest in the state. It contains extensive Federal and State lands, which have significant wildlife resources. Further, the county comprises significant farm and ranching operations. The latest annual crop report shows that livestock production represents nearly sixty percent of our total agricultural production value, coming in at over \$190,000,000. While predation traditionally peaks during calving/lambing time in the spring, our producers need the ability to implement coyote control year-round. In addition, many progressive operations are calving and lambing during other times of the year, so a coyote “season” would be detrimental to their ability to protect their flocks and herds.

Predator control is a critical part of maintaining, enhancing, and protecting this segment of our local economy. The ability to manage coyote populations is vital to mitigating harm to livestock and the viability of the natural resource-based enterprises in the area. Any action by the Wildlife Resources Committee to impose stricter regulations on an overpopulated species, such as the coyote, poses significant harm to the county’s livestock producers and the safety of domestic animals of our residents within our rural communities.

Due to the immensity of our landscape, significant coyote predation takes place beyond the ability of our producers to catch predators “in the act”. Federal grazing allotments can be tens of thousands of acres in size. Coyote predation control must be both reactive and proactive. Any changes in these regulations would undoubtedly result in limiting our constituents’ ability to reduce predation on their herds, flocks, and working dogs when the opportunity arises.

Grazing is finally being realized by both the federal and state agencies as an important tool in reducing hazardous fuels. There are significant opportunities for grazing animals to play an increasing role in wildfire prevention. Goats and sheep are specifically adept at reducing fuels, particularly browse. Predation, primarily from coyotes, is a major obstacle to increasing the numbers and use of these browsing animals.

As elected officials, livestock producers, and pet owners, we are compelled to advocate for the members of our community who have chosen to call Modoc County home and have deep roots in their cultural western herding ancestry. In this remote corner of California, our producers are often already burdened with a higher cost of operating due to the remote nature of our county.

Imposing additional barriers for constituents to be able to protect the livestock they diligently work to protect, which is the basis of our county's economic activity, seems counterproductive to California Fish and Game Code Section § 1801. Policies and Objectives (g) **To alleviate economic losses or public health or safety problems caused by wildlife to the people of the state, either individually or collectively. Such resolution shall be in a manner designed to bring the problem within tolerable limits consistent with economic and public health considerations and the objectives stated in subdivisions (a), (b), and (c).**

The County cannot emphasize strongly enough the need to maintain the status of coyotes as a non-game animal. Any restrictions on take, whether through seasons, limits, or other means of “management”, will be detrimental to our citizens. We urge you to take our comments into consideration and look beyond the urban voices to hear the smaller, but not less important, rural voices of California.

Sincerely,

A handwritten signature in blue ink that reads "Ned Coe". The signature is fluid and cursive, with the first name "Ned" and last name "Coe" clearly distinguishable.

Ned Coe
Chair of the Board

CC: President Samantha Murray, California Fish and Game Commission

From: Sherry Lawson <slawson@co.siskiyou.ca.us>

Sent: Wednesday, April 30, 2025 1:29 PM

To: FGC <FGC@fgc.ca.gov>

Cc: Teporaca.Roadrunner@asm.ca.gov; Karen Lange <karen@syaslpartners.com>;
elawyer@counties.org; Tracy Rhine <TRhine@rcrcnet.org>; erik.brahms@sen.ca.gov;
timwn6@gmail.com; maureen@calcattlemen.org; kirk@calcattlemen.org;
walkercattleranch@gmail.com

Subject: Letter - CA Fish & Game Commission: Take of Coyotes

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Good Afternoon,

Attached is a copy of a letter from the Siskiyou County Board of Supervisors to the California Fish & Game Commission, regarding the take of coyotes, being discussed at the upcoming meeting on May 15.

Thank you,

Sherry Lawson
Deputy County Administrator
Chief Fiscal Officer
1312 Fairlane Rd
Yreka, CA 96097
530-842-8024



COUNTY OF SISKIYOU

Board of Supervisors

1312 Fairlane Rd, Suite 1
Yreka, California 96097
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FAX (530) 842-8013
Toll Free: 1-888-854-2000, ext. 8005

April 29, 2025

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

RE: Wildlife Resources Commission (WRC) Meeting May 15, 2025,
Agenda Item 4, Take of Coyotes

Dear President Zavaleta,

The Siskiyou County Board of Supervisors is writing to express its strong opposition to the proposed removal of coyotes from the list of nongame mammals, as outlined in California Code of Regulations, Title 14, Section 472. This change would have serious and far-reaching consequences for California's rural communities, livestock producers, and local governments tasked with protecting public health and safety.

Siskiyou County, a rural agricultural community in Northern California, is home to many livestock producers whose livelihoods depend on healthy and productive herds. While several predators pose threats to livestock, coyotes represent the leading cause of livestock depredation statewide. In addition to direct loss of life, predator presence causes chronic stress to animals, disrupts reproductive patterns, and results in long-term impacts on herd health. Livestock producers must retain the ability to manage coyote populations to protect their animals and their economic stability.

Coyotes are prolific predators with rapid reproductive cycles. Their presence in agricultural and semi-rural areas has a direct and measurable impact on livestock, particularly sheep, goats, poultry, and young calves. Current regulations provide property owners with the necessary flexibility to address these threats in a timely and responsible manner. Reclassifying coyotes and restricting take would severely limit landowners' ability to safeguard their livestock, investments, and way of life.

California's current classification of coyotes as nongame mammals under Section 472 strikes a critical balance between humane wildlife management and practical land stewardship. The proposed change would upset this balance, placing an undue burden on rural communities and

Jess Harris
District 1

Ed Valenzuela
District 2

Michael N. Kobseff
District 3

Nancy Ogren
District 4

Ray Haupt
District 5

jeopardizing both economic and ecological stability. We urge the Commission to reject any amendments that would restrict or eliminate the current authority to manage coyotes under Section 472.

Thank you for considering this input. We respectfully request that this letter be entered into the official record for the May 15, 2025 meeting of the Wildlife Resources Committee.

Sincerely,

Signed by:

852DA1B9F1C44B4
Nancy Ogren
Chair, Board of Supervisors

cc:

Rural County Representative of California (RCRC)
California State Association of Counties (CSAC)
Shaw Yoder Antwih Schmelzer & Lange
Assemblymember Heather Hadwick
Senator Megan Dahle
California Cattlemen's Association
Siskiyou County Cattlemen's Association
Siskiyou Couty Farm Bureau

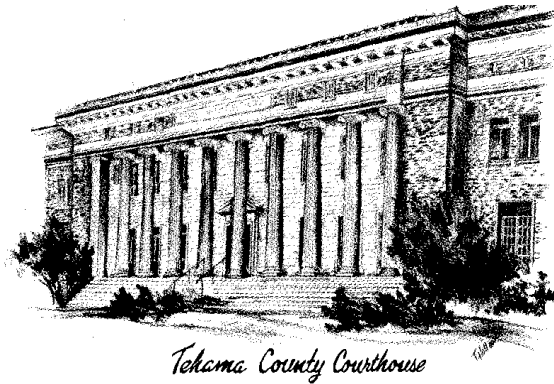
From: Matt Hansen <mhansen@tehama.gov>

Sent: Saturday, April 26, 2025 11:21 AM

To: FGC <FGC@fgc.ca.gov>

Subject: Letter of opposition to the reclassification of coyotes as game animals

Board of Supervisors
COUNTY OF TEHAMA



District 1 – Rob Burroughs
District 2 – Tom Walker
District 3 – Pati Nolen
District 4 – Matt Hansen
District 5 – Greg Jones

Dear California Wildlife Resources Committee,

I am writing you in strong opposition of reclassifying coyotes as game animals for the purpose of establishing a bag limit and hunting season. Coyotes are the most resilient, prolific and efficient predators in the State. Coyotes are a constant threat to livestock and domestic pets of rural residents and those that live in a wildlife/urban interface. We have seen where these animals become bolder and move into populated areas when they are not constantly pressured by humans to keep their distance. As an example, a member of my family lost a small family dog to a coyote when the coyote pursued the dog into the family residence and caught the dog as it was going through a dog door.

We have seen the disaster and explosion of the invasive wild hog population in the state after it too was made a game animal and hunting was limited. The restrictions on other the other predatory animals in the state have destroyed the states once thriving deer population and also threatens the livelihood of California ranchers. As a result, the state may be losing revenue from licensing and fines. This is not the solution. Protect game animals and domestic animals by appropriately managing predators. To my knowledge there are no shortage of coyotes in the state.

Respectfully,

Matthew C. Hansen
Tehama County Supervisor, District 4.



May 2, 2025

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

RE: Item 4; Change in Status of Coyotes; Potential Move from §472; Nongame Animals

President Zavaleta and Fish and Game Commissioners,

California Farm Bureau Federation ("Farm Bureau") is a non-governmental, non-profit, voluntary membership California corporation whose purpose is to protect and promote agricultural interests throughout the State of California and to find solutions to the problems of the farm, the farm home, and the rural community. Farm Bureau is California's largest farm organization, comprised of 54 county Farm Bureaus currently representing approximately 26,000 agricultural, associate, and collegiate members in 57 counties. Farm Bureau strives to protect and improve the ability of farmers and ranchers engaged in production agriculture to provide a reliable supply of food and fiber through responsible stewardship of California's resources.

The Rural County Representatives of California (RCRC) is a forty member county service organization that champions policies on behalf of California's rural counties. RCRC works hand-in-hand with its membership to advocate for rural issues at the state and federal levels. RCRC provides the rural county perspective on a myriad of issues throughout the legislative and regulatory processes, including land use, water and natural resources, housing, transportation, wildfire protection policies, and health and human services. Since its inception, RCRC has fostered policies and programs that reflect the unique rural heritage and the current conditions and needs of our member counties, while also promoting a greater understanding among policy makers about the unique challenges that face California's small population counties.

California Wool Growers Association (CWGA) is the voice of the California sheep industry, delivering lasting value to support and grow all segments of the California sheep industry through advocacy, education, and investment in markets and infrastructure. CWGA represents more than 500 sheep producers including farm-flock, large commercial operations, lamb feeders, seedstock producers, club/show lamb producers, producers of wool/fiber, goat producers, and industry stakeholders.

Following the January WRC meeting and the subsequent February and April Commission meetings, the undersigned organizations write with strong opposition to removing coyotes from C.C.R §472; nongame animals code section. Any change to code section will have the unintended consequence of removing tools from farmers and ranchers at a time they so desperately need every tool available to protect their crops and livestock during depredation, but also before depredation occurs.

There is no need to remove coyotes from §472. The decision is not based in any scientific reason or health of the species' population. In fact, there is no evidence that take of coyotes reduces their overall population significantly.¹ Removing coyotes from §472 would mean including them as a hunted species. This would further put undue burdens which would complicate their take.

¹ F. F. Knowlton, E. M. Gese, and M. M. Jaeger, Coyote Depredation Control: An Interface between Biology and Management, *Journal of Range Management* 52, no. 5 (1999); Robert Crabtree and Jennifer Sheldon, Coyotes and Canid Coexistence in Yellowstone, in *Carnivores in Ecosystems: The Yellowstone Experience*, ed. T. Clark et al. (New Haven [Conn.]: Yale University Press, 1999); J. M. Goodrich and S. W. Buskirk, Control of Abundant Native Vertebrates for Conservation of Endangered Species, *Conservation Biology* 9, no. 6 (1995).

Coyotes would be subject to a bag limit. Any sort of bag limit would be a detriment to a farmer or rancher on their property who is trying to prevent damage or depredation when they see an animal and not during or after. Personal property rights are paramount and infringing on those rights is a massive overstep.

Coyotes would be put under a hunting season. There is no season for coyotes or time when they feed. Farmers and ranchers need the ability, with discretion for personal preference, to take a coyote at any time. A hunting season is unacceptable. Because there would be a hunting season, a hunting license would be required. No farmer or rancher should be worried about being current on their hunting license in order to defend their property or crops.

Fish and Game has said they are unable to meet the core functions of the department currently and removing coyotes from section 472 and establishing a bag and season limit would only exacerbate the inability for the department to meet their current obligations.

Section 472 provides farmers and ranchers with the ability to protect their crops and livestock before there is a conflict. We know from reported data that coyotes are 14% of calls into the WIR system. If coyotes are removed from 472, the conflict is only going to increase. We cannot wait until there is a problem with a species when we know their numbers total over 250,000.

Coyotes also serve as natural rodent control and the benefits are many to the species living in harmony on the land. It should be up to the individual to decide what is best on their property.

Agriculture isn't the target of this change to remove coyotes from §472. Farmers and ranchers should be given tools to take coyotes prior to depredation or property loss. We wholly oppose any attempt to remove coyotes from the current code section and oppose any attempt to limit options to take coyotes that do not give farmers and ranchers the tools they need.

Thank you for the opportunity to provide our comments. We look forward to further involvement and discussion with the Fish and Game Commission. Please contact Steven Fenaroli to discuss further, sfenaroli@cfbf.com, (916) 561-5617.

Sincerely,

California Farm Bureau
Rural Counties Representatives of
California
California Woolgrowers Association
Alameda County Farm Bureau
Amador County Farm Bureau
Butte County Farm Bureau
Calaveras County Farm Bureau
Colusa County Farm Bureau
Del Norte County Farm Bureau
El Dorado County Farm Bureau
Fresno County Farm Bureau

Glenn County Farm Bureau
Humboldt County Farm Bureau
Inyo-Mono County Farm Bureau
Lake County Farm Bureau
Marin County Farm Bureau
Modoc County Farm Bureau
Monterey County Farm Bureau
Napa County Farm Bureau
Nevada County Farm Bureau
Placer County Farm Bureau
Plumas-Sierra County Farm Bureau
Sacramento County Farm Bureau

San Benito County Farm Bureau
Shasta County Farm Bureau
Siskiyou County Farm Bureau
Solano County Farm Bureau
Stanislaus County Farm Bureau
Tehama County Farm Bureau

Trinity County Farm Bureau
Tulare County Farm Bureau
Tuolumne County Farm Bureau
Yolo County Farm Bureau
Yuba-Sutter County Farm Bureau



MODOC COUNTY FARM BUREAU

108 EAST 1ST STREET • P.O. BOX 1692, ALTURAS, CA 96101

TELEPHONE (530) 233-FARM (-3276) • FAX (530) 233-4738 • modocfb@hdo.net

1 May, 2025

Wildlife Resources Committee
California Fish and Game Commission
P.O. Box 944209
Sacramento, CA 94244-2090

**RE: Potential Recommendations to the Commission Regarding Coyote Take
Regulations-Item 4 on the Committee's May 15 Agenda**

Dear Committee CO-Chairs Zavaleta and Anderson:

The Modoc County Farm Bureau (MCFB) submits the following comments regarding Agenda Item #4 on your May 15 agenda regarding potential recommendations to amend Section 472 related to coyote take regulations. We strongly oppose any changes to this section that would change the status of coyotes from a non-game status.

MCFB is a non-governmental, non-profit voluntary membership organization whose purpose is to protect and promote agricultural interests in Modoc County and to find solutions to the problems of the farm, the farm home and our rural communities through the responsible stewardship of natural resources. Our members are actively involved in stewardship of both private and public lands and their resources. A change in the coyote's status to that of a game animal will severely impact their ability to protect both their private property and the public resources that allow them to earn their livelihood and to recreate.

Our members work daily to protect their investment in their flocks and herds from predators. It is almost unconscionable that they are prevented from effectively dealing with predation from wolves, mountain lions and burgeoning black bear population (no hunt zone). Changing the status of coyotes to a game animal, with all the restrictions that would bring, would cause severe economic hardship for them and the local economy. Animal agriculture is the primary driver of Modoc County's agricultural economy.

It is clear that this is an emotional/political issue, not a science based one.. There is no evidence that coyote populations are anything but thriving and expanding into more and more suburban and urban areas. Our producer members tell us there has been no let up in the degree of predation on their flocks and herds. This position is supported by reports from the local USDA Wildlife Services staff. The real question is why this issue is even being considered!!

The logistics of handling coyotes as a game animal is beyond the capacity of the Department. The delays in obtaining depredation permits for crop and livestock damage is already slow.

Designating coyotes as a game animal with limits, tags, seasons, etc, will result in massive numbers of requests for depredation permits as producers rush to protect their investments in livestock during the non-hunting season.

Protecting flocks and herds against predation is a year round effort. It must be proactive as well as reactive. It's not often that coyotes are caught in the act of predation, usually just the results are discovered. Much of the time, herds are miles away on federal grazing allotments that can be as large as 100,000 acres. Consequently, coyote control must take place when the opportunity presents itself, not be limited to an arbitrarily designated season with limits on take.

A number of our members would like to take advantage of the federal and state resource agencies' recognition of the role sheep and goats can play in targeted hazardous fuel reduction. However, the number one reason they hesitate to increase the numbers of their browsing livestock is predation, primarily by coyotes. Designating coyotes a game animal would create an unnecessary, additional challenge to this opportunity.

MCFB appreciates this opportunity to comment. We strongly urge you to maintain the non-game status of coyotes. There is no demonstrated scientific reason to even consider such a change. It would cause unnecessary hardship on our members and our local communities and have a major economic impact at both the producer and community level.

Sincerely,

A handwritten signature in black ink that reads "Sean Curtis". The signature is written in a cursive, flowing style.

Sean Curtis

President



California Wool Growers Assn.

P.O. Box 68, Catheys Valley, CA 95306

www.californiawoolgrowers.org - 916-444-8122 - info@woolgrowers.org

Phillip Esnoz, President
Shafter

Cole Bakke, Vice President
Visalia

Mark Blakeman, Treasurer
Marysville

April 24, 2025

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

RE: Change in Status of Coyotes; Potential Move from §472; Nongame Animals

President Zavaleta and Commissioners,

The California Wool Growers Association is the oldest agricultural organization in California representing sheep farmers and ranchers across the state.

We oppose removing the coyotes from C.C.R. §472; nongame animals code section. Any change to the code section will remove tools from our members to protect their crops and livestock from depredation. We realize coyotes serve as natural rodent control, but individual farmers and ranchers should have the ability to take coyotes prior to depredation of their livestock or property loss. Under §472, coyotes would be put under a hunting season with a bag limit. Farmers and ranchers need to be able to take a coyote at any time using their discretion.

Thank you for the opportunity to provide our comments. Please feel free to contact me if you have any questions.

Sincerely,

Phillip Esnoz, President
California Wool Growers Association

CALIFORNIA CATTLEMEN'S ASSOCIATION

3841 N. FREEWAY BLVD., SUITE #130, SACRAMENTO, CALIFORNIA 95834

SERVING THE CATTLE
COMMUNITY SINCE 1917



PHONE: (916) 444-0845
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www.calcattlemen.org

Submitted via email to fgc@fgc.ca.gov

May 2, 2025

President Erika Zavaleta and Commissioner Darius Anderson
Co-Chairs, Wildlife Resources Committee
California Fish and Game Commission
P.O. Box 944209
Sacramento, CA 94244

Re: Discussion and potential recommendations for changes to regulations regarding the take of coyotes

President Zavaleta and Commissioner Anderson:

The California Cattlemen's Association 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. CCA appreciates the opportunity to provide feedback as the Wildlife Resource Committee considers recommending that coyotes be removed from the list of nongame mammals which "may be taken at any time of the year and in any number" under 14 C.C.R. § 472. CCA previously raised objections regarding action taken at the January 15 WRC meeting in which the Committee recommended "that the Commission approve a future rulemaking to amend Section 472 to remove coyotes, in concert with a future rulemaking to maintain hunting opportunities." We appreciate your thoughtful consideration of those objections at the February 12 meeting of the Commission, and we are grateful for your decision to re-refer the matter for further discussion and analysis at the Committee's March 15 hearing.

Coyotes significant impact cattle operations, stressing herds, disrupting calving patterns, and killing calves. To protect livestock, ranchers must not merely be reactive (taking coyotes which prey upon livestock), they must often be proactive in managing coyote populations to *prevent* harm to livestock. Unfortunately, removing coyotes from the list of nongame mammals which may be taken at any time and in any number would preclude preventative damage management, risking significant harm to California's livestock producers. For this reason and others addressed below, **CCA strongly opposes any effort to remove coyotes from the provisions of 14 C.C.R. § 472.**

Coyote predation significantly impacts California's ranching community

According to a 2017 report by the United States Department of Agriculture, coyotes were responsible for 34.9% of all cattle lost to predation in 2015, killing more cattle than any other predator species in the state.¹ Last year, an environmental analysis completed by USDA and the California Department of Food and Agriculture found that USDA-verified predation by coyotes

¹ U.S. DEP'T OF AGRIC., CATTLE AND CALVES DEATH LOSS IN THE UNITED STATES DUE TO PREDATOR AND NONPREDATOR CAUSES 55 tbl. D.1.c. (2017).

RICK ROBERTI
PRESIDENT
LOYALTON

BEV BIGGER
TREASURER
VENTURA

BILLY GATLIN
EXECUTIVE VICE PRESIDENT
TEMPLETON

JOHN AUSTEL
SECOND VICE PRESIDENT
BOULEVARD

STEVE LAMBERT
SECOND VICE PRESIDENT
OROVILLE

MIKE WILLIAMS
FIRST VICE PRESIDENT
ACTON

MIKE SULPIZIO
FEEDER COUNCIL CHAIR
BRAWLEY

ANTHONY STORNETTA
SECOND VICE PRESIDENT
ATASCADERO

JACK HOEKSTRA
FEEDER COUNCIL VICECHAIR
CALIPATRIA

cost California cattle producers nearly \$1.8 million between 2010 and 2019,² though the analysis noted that “only a fraction of the total predation attributable to coyotes...was reported to or verified by [USDA’s] Wildlife Services nationally.”³ Altogether, coyote predation of livestock and poultry over that period was confirmed to cause more than \$3.3 million in losses (again, a significant understatement of *actual* damages).⁴ Coyotes were also responsible for nearly \$200,000 in damages to crops and orchards,⁵ and an additional \$1 million in damage to other property (including pets).⁶

It is worth noting that, in addition to being vastly under-reported, these predation rates and economic damages exist amidst the background of current § 472, which permits the take of coyotes “at any time of the year and in any number.” Any diminution of that take authority will certainly exacerbate kills of livestock and economic harm to producers.

Any proposal advancing out of the WRC ought to be narrowly-tailored to address specific regulatory shortcomings identified by the Commission

Much of the conversation about “indiscriminate” take of coyotes has centered around the trapping and killing practices of municipalities such as Torrence and Anaheim.⁷ If the Commission wishes to rein in “indiscriminate” take of coyotes by municipalities (and, to be clear, CCA has no position on whether such take *is* indiscriminate or should be curtailed), then the Commission should narrowly-tailor regulatory amendments to address that perceived ill, *without* broadly precluding ‘discriminate’ take of coyotes at any time of the year and in any number. This could be done, for instance, via amendments to the trapping regulations at 14 C.C.R. §§ 465.5 and 475. Any broad amendment to § 472 is likely to adversely impact farmers, ranchers, property owners, and sportsmen who have not contributed to the problem identified by stakeholders and Commissioners.

Preventative damage management differs from depredation take and “indiscriminate take”

At the January 15 meeting of the Wildlife Resources Committee, Commissioner Zavaleta suggested that “the central issue is around indiscriminate take,”⁸ noting that “this initially got brought to the Wildlife Resources Committee and agendized as a concern about indiscriminate take of particular non-game mammals.”⁹ For purposes of discussion, Commissioners and staff appeared to endorse the Oxford Languages definition of “indiscriminate” that appears when one types the word into a search engine such as Google: “done at random or without careful judgement; not using or exercising discrimination.”¹⁰

² CAL. DEP’T OF FOOD AND AGRIC. & U.S. DEP’T OF AGRIC. ANIMAL & PLANT HEALTH INSPECTION SERV. WILDLIFE SERV. - CAL., FINAL Environmental Impact Report/Environmental Impact Statement for the California Wildlife Damage Management Project 1-15 tbl. 1-2 (2024) [hereinafter California Wildlife Damage Management Project].

³ *Id.* at 1-8.

⁴ *Id.* at 1-15 tbl. 1-2.

⁵ *Id.* at 1-16 tbl. 1-3.

⁶ *Id.* at 1-19 tbl. 1-4.

⁷ See, e.g., Video recording: *Wildlife Resources Committee Meeting - January 15, 2025 - Sacramento | Webinar/ Teleconference*, at 4:38:36 (Jan. 15, 2025), available at https://www.youtube.com/watch?v=_tz6KlOpF8M [hereinafter January 15, 2025 WRC Meeting] (statement of Rebecca Dmytryk that “One extreme is cities like Torrence and Anaheim, with contracts for year-round, indiscriminate broadcast of traps throughout their area”).

⁸ *Id.* at 5:57:57.

⁹ *Id.* at 4:35:40.

¹⁰ *Id.* at 4:36:26.

Ranchers do not “indiscriminately” take coyotes. Coyotes are often permitted to roam near rangelands in recognition of the ecosystem services they provide, such as natural rodent control. Ranchers may, however, take problem coyotes in response to depredation events pursuant to Fish & Game Code § 4152(a), for instance in circumstances where a coyote has injured or killed a calf. It should be noted, however, that ranchers routinely seek to proactively *prevent* conflict between livestock and coyotes through nonlethal management strategies including exclusionary fencing, guard animals, carcass removal, human presence on the landscape, and other mechanisms.¹¹

But ranchers may also engage in *preventative* damage management that is neither indiscriminate nor a response to a discrete depredation event. For instance, in areas where significant coyote depredations of livestock have occurred in the past, ranchers “may conduct lethal predator management by removing coyotes in [that] specific area before lambing or calving begins in an attempt to preemptively prevent continued depredation.”¹² In other words, take of coyotes within an area may be conducted to *avoid probable depredation*, rather than waiting to *react* to discrete depredation events.

Commission staff seemingly recognized the necessity of this practice during the January 15 hearing of the WRC, as reflected in a conversation between Bill Gaines, Executive Director Melissa Miller-Henson, and Wildlife Advisor Ari Cornman:

MMH: “This conversation probably started six, seven years ago, right, where we saw the pictures of stacks of coyotes sitting on the side of the road and in the back of some pickup trucks, it was really – people got upset by seeing that.... But they can still go out and get truckloads of coyotes.”

BG: “But they’re doing that during calving season when they’re trying to cull back the population so that their livestock, right –”

AC: “That’s depredation take.”

BG: “– it’s not like you do it year-round, they’re specifically doing it to try to protect their livestock.”

MMH: “...to protect their livestock.”¹³

Despite Mr. Cornman’s assertion, though, this is not necessarily “depredation take” authorized under Fish & Game Code § 4152 because take is not necessarily limited to animals which “are found to be injuring growing crops or other property.” Rather, ranchers in such circumstances are utilizing the broad take authorization of § 472(a) to take coyotes which *threaten* their livestock, *preventing* depredation rather than responding to it.

Removing coyotes from § 472 will threaten ranchers’ ability to safeguard their livestock through preventative damage management. Imposing a bag limit is likely to hinder ranchers’ ability to

¹¹ California Wildlife Damage Management Project, *supra* note 2, at 1-12.

¹² *Id.* at 3-16.

¹³ January 15, 2025 WRC Meeting, *supra* note 7, at 5:09:21.

effectively protect their calving pastures in areas where coyote populations exceed the bag limit, and requiring ranchers to fall back on the depredation take provisions of § 4152 would require them to first suffer depredation by a target coyote, harming the health and welfare of livestock and the economic viability of ranchers.

Take of coyotes “at any time of the year and in any number” is not inconsistent with the Commission’s Terrestrial Predator Policy

Commissioner Zavaleta has repeatedly pointed to the Commission’s Terrestrial Predator Policy as necessitating the removal of coyotes from § 472.¹⁴ However, upon close examination, the Terrestrial Predator Policy can easily be squared with the broad take allowance for coyotes under § 472.

Take of coyotes “at any time of the year and in any number” is not inconsistent with the Commission’s Terrestrial Predator Policy because such take does not threaten coyote *populations*. The Terrestrial Predator Policy does not dictate that the Commission protect *individual animals*, but rather promotes the maintenance of “Existing native terrestrial *communities*” and calls upon the Commission to “protect and conserve predator *populations*.”¹⁵ There has been no suggestion that coyote *populations* are threatened by the broad take provisions of § 472. Indeed, USDA and CDFA estimate that there are at least 225,000 coyotes statewide (other estimates put that figure anywhere between 250,000 and 750,000)¹⁶ and suggest that a healthy population could be sustained even at a 50% mortality threshold.¹⁷

Indeed, § 472 can be read as explicitly consistent with the Commission’s Terrestrial Predator Policy. The policy addresses the need for “management strategies that *avoid* and *reduce* conflict that results in adverse impacts to...private property, agriculture, and public and private economic impacts.”¹⁸ As discussed above, preventative damage management authorized by § 472 enables ranchers to avoid predation upon cows and calves during calving season. Without the broad take authorization of § 472, ranchers will not be empowered to *avoid* adverse impacts to their livestock and livelihoods as envisioned in the Terrestrial Predator Policy.

Finally, the Terrestrial Predator Policy appears to explicitly validate methods of predator take approved under existing statute and regulation. The Policy recognizes the need for management decisions to be “in compliance with applicable state and federal laws and regulations” and suggests that “*all* legal tools *shall* be considered when managing to address conflict.”¹⁹ Under § 472 and authorizing statutes, take of coyotes in any number and at any time is a legal tool in compliance with applicable laws and regulations, and its availability as a management option ought to be preserved.

¹⁴ See, e.g., *id.* at 6:01:45 (“We have a terrestrial predator policy that speaks specifically to our responsibility to protect native predators...and there’s a conflict between 472 and our predator policy”).

¹⁵ Terrestrial Predator Policy III(A), CAL. FISH & GAME COMM’N, WILDLIFE POLICIES (*emphasis added*), <https://fgc.ca.gov/About/Policies/Wildlife>.

¹⁶ U.S. FOREST SERV., MENDOCINO NAT’L FOREST, *Animals and Plants*, <https://www.fs.usda.gov/r05/mendocino/animals-plants> (“The California Department of Fish and Game estimates a population range of 250,000 to 750,000 individuals”).

¹⁷ California Wildlife Damage Management Project, *supra* note 2, at 4.2.2-19.

¹⁸ Terrestrial Predator Policy, *supra* note 15, at III(C) (*emphasis added*).

¹⁹ *Id.* (*emphasis added*).

The Commission ought not prioritize this matter amid severe staffing and capacity challenges

The Commission's Executive Director has noted that "The Commission continues to face staffing and capacity challenges resulting from multiple sources," including "vacancies, budget, and excess leave balances."²⁰ Additionally, at the January 15 meeting of the WRC, Commission and Department staff repeatedly noted that there would be administrative burdens and enforcement challenges resulting from removal of coyotes from § 472 and the regulation of non-depredation take via subsequent hunting regulations. Given that there has been no suggestion that coyote populations are in peril and considering the abundance of other fish and wildlife matters already on the Commission's docket, the Commission ought not divert limited resources to revising § 472.

Removing coyotes from § 472 would exacerbate already-substantial predator pressures on ranchers

Predation of livestock has become an increasingly pressing concern for ranchers in recent years. Gray wolves are fully protected under both the state and federal endangered species acts, and as their population and range have climbed steadily over the past decade, so too has the frequency of livestock depredations by wolves – with no ability for ranchers or the Department to manage problem animals. The Department has in recent years made it increasingly challenging for ranchers to obtain lethal depredation permits for mountain lions and bears found to kill or maim cattle. As a result, ranchers are suffering increased livestock losses and economic harm, with many feeling helpless to prevent the loss of the animals in their care to predators. Any regulation that limits ranchers' ability to engage in preventative damage management of coyotes will further exacerbate these depredation losses and further erode any good will between regulators and the regulated community.

Conclusion

Ranchers' ability to take coyotes at any time and in any number is crucial to ensuring their ability to safeguard their livestock and avoid economic injury. As discussed above, none of the justifications thus far advanced for limiting take of coyotes warrants depriving ranchers of existing management tools. Consequently, we urge the Committee to **reject the proposed removal of coyotes from 14 C.C.R. § 472.**

Sincerely,



Kirk Wilbur
Vice President of Government Affairs

²⁰ Commission Executive Director Report, Commission Meeting Document 7A, February 12-13, 2025 meeting of the California Fish & Game Commission, <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=228276&inline>.

From: Tim Nielsen [REDACTED]

Sent: Friday, May 2, 2025 3:04 PM

To: FGC <FGC@fgc.ca.gov>

Subject: Comment Letter for May 15 Wildlife Resources Committee Meeting

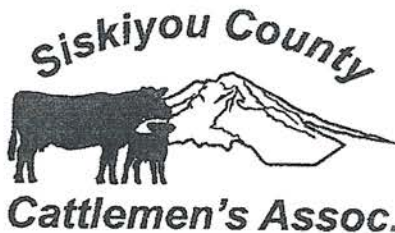
You don't often get email from [REDACTED]. [Learn why this is important](#)

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Attached to this email is a letter on the behalf of Siskiyou County Cattlemen's Association regarding the consideration of regulations for coyotes in the upcoming May 15th Wildlife Resources Committee meeting. I'd greatly appreciate that this letter is provided to the members of the committee.

Thank you,

Tim Nielsen



"FROM OUR RANCHES TO YOUR PLATE, TOP CATTLE FROM THE TOP OF THE STATE"

**1655 S. MAIN STREET
YREKA, CA 96097**

April 28th, 2025

President Erika Zavaleta
California Fish and Game Commission
P.O. Box 944209
Sacramento, CA 94244

RE: Committee and Department Reports: Wildlife Resources Committee (Agenda Item 4)

President Zavaleta and Wildlife Resources Committee members:

I am writing this letter on behalf of the Siskiyou County Cattlemen's Association (SCCA) to express our strong concern regarding the Wildlife Resources Committee's (WRC) discussion to potentially create regulations regarding the take of coyotes. We understand that since the beginning of 2025, the WRC has expressed interest in restricting the take of coyotes and the SCCA strongly opposes any such restrictions.

Rural agricultural communities across the state will be negatively affected if the committee moves forward with increased regulations for taking coyotes. Coyotes, if left unmanaged, pose a grave threat to livestock operations, causing increased stress to livestock, disrupting their reproductive patterns, weight loss, and the direct deprivation of animals. Cattle ranchers are compelled to manage coyote populations to safeguard from the above-described issues. The WRC's consideration of imposing regulation on the take of coyotes will absolutely disrupt the current ecological balance between coyotes and their interactions with livestock in a very negative way.

Currently, coyote populations are very healthy, with nowhere in the state reporting a decline in coyote numbers that would warrant them to be listed as either threatened or endangered by the California Fish and Game Commission. While coyotes play a key role in maintaining populations of small mammal/rodents, it is absolutely critical that coyote populations are also managed so they aren't left unchecked. Personally, as a fifth-generation California cattle rancher, I know the benefit that coyotes have in keeping my ranch robust and healthy. Coyotes do a great job in managing the populations of ground squirrels, gophers, and yellow-bellied marmots on my ranch. I never bother a coyote on my ranch that is actively hunting these small rodents.

However, I also understand that if left unmanaged, coyotes can wreak havoc on my livestock and wildlife on my ranch. I have lost several cows and numerous calves to coyote deprivations and have seen the negative consequences in herd behavior, reproductive production, and livestock health in my cattle from increased stress due to coyote interactions. More times than I can count, I've come across cows that while calving, have had to actively fight off coyotes. In such cases the mother is forced to stand and constantly circle over her newborn calf to fight the coyote(s) while not being able to nurture her offspring. Frequently, the cow tramples and accidentally kills her own offspring in the act of protecting it from the intrusive coyotes. In instances when the calf is not trampled, the newborn calf is not able to nurse its mother or even be properly cleaned of afterbirth by its mother. Under current allowances of take, it has been a simple process of eliminating the problem coyote(s) and allow the mother to care for her calf. What does WRC propose should occur in the forementioned situation if it were to restrict the take of coyotes?

I've also unfortunately had to experience coyote deprivations of cows that are actively calving. In the late stages of parturition, the cow usually must lay down to finish birthing her calf. Occasionally, at this stage the cow is unable to stand until she has finished with the birth of her offspring. It is not uncommon for coyotes to take advantage of this immobility and begin feeding on the cow while she is still alive. This leads to a very gruesome and painful death of the cow and calf. Actively taking coyotes that are interacting with livestock before and during calving is the only management tool to avoid this horrific situation.

It is the hope of the SCCA that the WRC does not recommend take regulations for coyotes. I personally hope that the WRC thinks about some of the brief interactions of coyotes and livestock that I've listed in this letter and consider the consequences that will occur if regulation is created on taking coyotes.

Sincerely,

A handwritten signature in black ink, appearing to read "Tim Nielsen". The signature is fluid and cursive, with a long horizontal stroke at the end.

Tim Nielsen
President of Siskiyou County Cattlemen's Association



February 7, 2025

California Fish and Game Commission
715 P Street, 16th floor
P.O. Box 944209
Sacramento, CA 95814
via: fgc@fgc.ca.gov

Re: Take of Nongame Mammals - Removing Coyotes from Section 472 Nongame Species

Dear President Samantha Murray and Fish and Game Commission members,

On behalf of Project Coyote's California members and supporters, we express our strong support for the Wildlife Resources Committee's (WRC) recommendation to initiate rulemaking to remove coyotes from the list of nongame animals in Section 472 of the California Code of Regulations. This critical regulatory change would prohibit the unlimited indiscriminate killing of coyotes while allowing for the promulgation of a regulated hunting season and targeted lethal control measures in cases of property damage.

In short, this recommended regulatory action addresses ongoing scientific and ethical concerns, with the current regulatory framework allowing for the indiscriminate killing of coyotes. Decades of scientific research demonstrate that indiscriminate lethal control of coyotes does not reduce their populations or mitigate human-wildlife conflict. Instead, it can be counterproductive, disrupting social structures, increasing breeding, and exacerbating conflicts. We urge the California Fish and Game Commission (Commission) to move forward with the WRC's recommended rulemaking in light of key scientific and ethical arguments detailed below.

Scientific/Ecological Arguments

Ineffectiveness of Indiscriminate Lethal Control

Firstly, best available scientific evidence shows that lethal control of coyotes is ineffective at controlling populations or reducing conflict. Indiscriminate killing of coyotes stimulates increases in their populations by disrupting their social structure, which encourages more breeding and migration (Knowlton et al. 1999; Blejwas et al. 2002). Unexploited coyote populations naturally limit their population density by establishing and defending non-overlapping territories and behaviorally suppressing breeding among subordinate members of their extended family group. This prevents overpopulation in any given area and ensures sustainable prey resources for the group.

Efforts to reduce coyote populations through unregulated and unlimited killing have largely been unsuccessful because coyotes exhibit strong compensatory population responses to lethal control.



While lethal control may result in short-term reductions in the number of coyotes in a specific area, the vacuum is soon filled by coyotes emigrating from surrounding areas (Gese 2005; Kilgo et al. 2017). Disruption of family groups allows more subordinate females to breed. The temporary increase in prey availability results in increased pup survival (Gese 2005) and overall can result in an increase in regional coyote populations following lethal control actions (Crabtree & Sheldon 1999; Moll 2024; Margenau 2023).

Long-term studies confirm that removing stable coyote populations can actually increase conflicts by opening territories to younger juvenile dispersers who may be more prone to pursue atypical food resources, resulting in increased conflicts. Research from Cook County, Illinois, found that removing non-problem coyotes created openings for more human-tolerant individuals, increasing interactions and conflicts (Fox 2006; Gehrt, 2004).

Coyotes' Crucial Role in Ecosystems

Furthermore, coyotes play a crucial role in ecosystems, regulating rodent populations, enhancing songbird diversity, and contributing to ecological health and ecosystem regulation (Crooks & Soulé 1999; Fedriani et al. 2001; Gehrt et al. 2013; Gese 2005; Kays et al. 2015; Henke and Bryant 1999). Killing coyotes disrupts their intrinsic population regulation mechanisms (Wallach et al. 2015) and triggers ecological degradation, impacting the health, integrity, and diversity of ecosystems (Estes et al. 2011; Roemer et al 2009; Prugh et al. 2009; Terborgh et al. 1999).

Hence, through their highly adaptable nature, coyotes impact a community's food web and play an important role in their ecological systems, both rural and urban. In areas where coyotes are serving the role of apex predator, their removal can precipitate an ecological chain reaction that leads to profound degradation of the health, integrity, and diversity of the ecosystem (Soulé et al. 2003; Crooks & Soulé 1999; Gehrt et al. 2013; Kays et al. 2015; Henke and Bryant 1999). Arbitrarily and indiscriminately removing coyotes from the environment may set off a cascade of negative environmental consequences. Given these critical ecological contributions, indiscriminate killing contradicts science-based wildlife stewardship.

Ethical Concerns

In addition to the empirical arguments in the previous section, there are also important ethical considerations that argue in favor of the proposed action. The [Commission's Terrestrial Predator Policy](#), notes the intrinsic and cultural value of native terrestrial predators and directs CDFW policies that:

“promote the ecological, scientific, aesthetic, recreational, and educational value of native terrestrial predators in the context of ecosystem-based management, while minimizing adverse impacts on wildlife and reducing conflicts that result in adverse impacts to humans, including



health and safety, private property, agriculture, and other public and private economic impacts” (California Fish and Game Commission, Adopted April 19, 2018.).

In contrast, the current classification of coyotes as nongame animals—allowing their year-round, indiscriminate killing—directly contradicts this directive. A proper ecosystem-based management approach requires maintaining ecological functions and predator-prey relationships, yet unlimited lethal removal disrupts these processes by destabilizing coyote populations, leading to increased conflicts and ecological imbalance. The proposed regulatory action is essential to ensuring ecosystem-based management and reducing human-wildlife conflict in a way that aligns with the stated values of the Commission’s Terrestrial Predator Policy.

Further, the current regulatory framework allows for coyotes to be killed 365 days a year in an unlimited number; this includes unethical practices such as killing coyote parents during pup rearing season (April-August). During the pup-rearing period, coyote parents, deeply bonded with their mate and pups, prioritize protecting and providing for their offspring. This parental commitment constrains their movements and behaviors, challenging claims of 'fair chase' ethics in hunting. Hunting coyote parents during this period results in orphaned dependent young, depriving pups of vital sustenance, social bonds, and nurturing crucial for their development and flourishing. **We strongly urge the Commission to not only set bag and possession limits for coyotes- but also to restrict the take season to limit the number of orphaned young during the pup-rearing season.**

Moreover, as a state wildlife agency entrusted with managing wildlife in the public trust, the Commission has an ethical obligation to ensure its policies align with both scientific best practices and public values. The public trust doctrine affirms that wildlife is a shared asset, and policies allowing unlimited, unregulated killing of a key predator fail to uphold this principle. Restricting indiscriminate killing would bring California’s wildlife management approach into alignment with its own policy framework, scientific evidence, and ethical stewardship of natural resources.

Lack of Public Support for Indiscriminate Killing

Lastly, the existing regulatory framework allowing indiscriminate coyote killing lacks broad public support, as evidenced by recent public opinion polling. In 2024, Project Coyote, in collaboration with the Animal-Human Policy Center at Colorado State University, conducted a national public survey that found overwhelming public support for restricting unlimited carnivore killing (Niemic et al. 2024):

- 81.7% of respondents supported state laws limiting hunting season length for wild carnivores.
- 81.8% supported laws capping the number of carnivores an individual hunter can kill per year.

These findings underscore that the vast majority of the public—including Californians—oppose policies allowing unlimited, indiscriminate killing of wild carnivores, including coyotes. The proposed regulatory



changes would help to bring California's wildlife policies into better alignment with public values, ethical principles, and best management practices.

Conclusion

Allowing the indiscriminate killing of coyotes not only explicitly dismisses relevant scientific concerns but also promotes views that run contrary to Commission policies, ethical coexistence, holistic scientific understanding, and the values of a majority of Californians. We strongly encourage the Commission to proceed with this rulemaking to align California's wildlife policies and regulations with the best available science, ensuring a more ethical and effective approach to coyote management.

Respectfully submitted,

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David Parsons
Science & Ethics Advisory Board Member
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Literature Cited:

Blejwas, K. M., B. N. Sacks, M. M. Jaeger, and D. R. McCullough. 2002. The effectiveness of selective removal of breeding coyotes in reducing sheep predation. *Journal of Wildlife Management* 66:451-62.

California Fish and Game Commission. (n.d.). Wildlife policies: Terrestrial predator policy. Retrieved February 4, 2025, from <https://fgc.ca.gov/About/Policies/Wildlife>

Crabtree, RL, and JW Sheldon. 1999. The Ecological Role of Coyotes on Yellowstone's Northern Range. *Yellowstone Science* 7(2):15-23.

Crooks, K.R., and M.E. Soulé. 1999. Mesopredator release and avifaunal extinctions in a fragmented system. *Nature*. 400: 563-566.

Estes, J. A., Terborgh, J., Brashares, J. S., Power, M. E., Berger, J., Bond, W. J., ... & Wardle, D. A. (2011). Trophic downgrading of planet Earth. *science*, 333(6040), 301-306.

Fedriani, J.M., T.K. Fuller, and R.M. Sauvajot. 2001. Does availability of anthropogenic food enhances densities of omnivorous mammals? An example with coyotes in southern California. *Ecography*. 24: 325-331.

Fox, C.H. 2006. Coyotes and humans: Can we coexist? *Proc. 22 Vertebr. Pest Conf.* (Timm, R.M., and J.M. O'Brien, eds.). University of California, Davis. pp. 287-293. Fox, C.H., and C.M. Papouchis. 2005. Coyotes in our Midst: Coexisting with an Adaptable and Resilient Carnivore. Animal Protection Institute, Sacramento, CA. 64 pp.

Gese, Eric M. 2005. Demographic and Spatial Responses of Coyotes to Changes in Food and Exploitation. *Proceedings of the Wildlife Damage Management Conference* 11: 271–85.
http://digitalcommons.unl.edu/icwdm_wdmconfproc%0Ahttp://digitalcommons.unl.edu/icwdm_wdmconfproc/131

Gehrt, S.D. 2004. Chicago coyotes part II. *Wildlife Control Technology*. 11(4): 20-21, 38-39, 42.
Henke, S. E., and F. C. Bryant. 1999. Effect of coyote removal on the faunal community in western Texas. *Journal of Wild- life Management* 63:1066–1081.

Goodrich, J. M., & Buskirk, S. W. (1995). Control of abundant native vertebrates for conservation of endangered species. *Conservation Biology*, 9(6), 1357-1364.

Kays, Roland, Robert Costello, Tavis Forrester, Megan C Baker, Arielle W Parsons, L Kalies, George Hess, Joshua J Millspaugh, and William Mcshea. 2015. "Cats Are Rare Where Coyotes Roam." *Journal of Mammalogy* 96 (5): 981–87. <https://doi.org/10.1093/jmammal/gyv100>

Knowlton, F. F., Gese, E. M., & Jaeger, M. M. (1999). Coyote depredation control: an interface between biology and management.

Kilgo, John C., Christopher E. Shaw, Mark Vukovich, Michael J. Conroy, and Charles Ruth. 2017. "Reproductive Characteristics of a Coyote Population before and during Exploitation." *Journal of Wildlife Management* 81 (8): 1386–93. <https://doi.org/10.1002/jwmg.21329>.

Margenau, L. L., Russell, R. E., Hanrahan, A. T., Roberts, N. M., Price Tack, J. L., & Storm, D. J. (2023). Survival and cause-specific mortality of coyotes in Wisconsin. *Journal of Mammalogy*, 104(4), 833-845.

Moll, R. J., Green, A. M., Allen, M. L., & Kays, R. (2024). People or predators? Comparing habitat-dependent effects of hunting and large carnivores on the abundance of North America's top mesocarnivore. *Ecography*, e07390.

Niemiec, R., Mertens, A., Crooks, K., Kogan, L., Seacor, R., & Santiago-Ávila, F. J. (2024). United



PROTECTING WILD CARNIVORES
FOSTERING THRIVING ECOSYSTEMS

States Resident Survey on Animal Protection Issues and Policy Solutions: National Public Survey Report. Colorado State University, University of California Berkeley, Project Coyote, Washington Wildlife First.

Prugh, L. R., Stoner, C. J., Epps, C. W., Bean, W. T., Ripple, W. J., Laliberte, A. S., & Brashares, J. S. (2009). The rise of the mesopredator. *Bioscience*, 59(9), 779–791.

Roemer, G. W., Gompper, M. E., & Valkenburgh, B. Van. (2009). The ecological role of the mammalian mesocarnivore. *BioScience*, 59(2), 165–173.

Soulé, M. E., Estes, J. A., Berger, J., & Martinez del Rio, C. (2003). Ecological effectiveness: Conservation goals for interactive species. *Conservation Biology*, 17(5), 1238-1250.

Terborgh, J., Estes, J. A., Paquet, P., Ralls, K., Boyd-Herger, D., Miller, B. J., & Noss, R. F. (1999). The role of top carnivores in regulating terrestrial ecosystems. *Endangered Species Update*, 18(5), 2001.

Henke, S.E. and Bryant, F.C. (1999) Effects of Coyote Removal on the Faunal Community in Western Texas. *Journal of Wildlife Management*, 63, 1066-1081.
<http://dx.doi.org/10.2307/3802826>



PROTECTING WILD CARNIVORES
FOSTERING THRIVING ECOSYSTEMS

April 28, 2025

Wildlife Resources Committee
California Fish and Game Commission
715 P Street, 16th floor, P.O. Box 944209
Sacramento, CA 95814
Letter submitted by email to fgc@fgc.ca.gov

Re: “Take of coyotes” ~ Discussion and potential recommendations for changes to regulations regarding the take of coyotes

Dear Wildlife Resource Committee members:

On behalf of Project Coyote’s California members and supporters, thank you for the opportunity to engage in the Wildlife Resources Committee’s (WRC) meetings on the regulatory status of non-game animals, including coyotes. As in the past, Project Coyote expresses strong support for WRC’s potential proposal to initiate rulemaking so that coyotes are no longer treated as “non-game” animals with no protections. We believe that promulgating new regulations is essential to more scientifically and ethically manage this native carnivore species across California.

Since 2023, WRC’s discussions on this topic have emphasized the need for a consistent regulatory response to wildlife depredation, prevention of human-wildlife conflicts, and improved monitoring of coyote populations. No longer treating coyotes as a “non-game” animal would fulfill these goals because it would end unlimited killing of coyotes in California, establish a regulated hunting season, and propel rule changes to better define when and under what circumstances coyotes may be taken.

For decades, the federal government and most states have deployed widespread, indiscriminate killing in an effort to reduce coyote populations and remove animals deemed to be problematic. Yet, because of the biology and ecology of coyotes, lethal control measures have proven ineffective at controlling populations or reducing conflict—in turn necessitating an evolved, science-based approach to managing the species.

We urge the WRC to move forward with its recommendation to the Fish and Game Commission (Commission), which would position California as a leader in ending an ineffective, outdated, and un-scientific approach to coyote management. As discussed below, there are strong scientific and ethical arguments for doing so, as well as existing regulatory mechanisms to guide this change.

The Commission would have broad public support for rulemaking to establish new regulations for coyote management. In 2024, Project Coyote, in collaboration with the Animal-Human Policy Center at Colorado State University, conducted a national public survey that found overwhelming public support for restricting unlimited carnivore killing, including nearly 82% of respondents

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supporting state laws to limit hunting season length for wild carnivores and cap the number of carnivores an individual hunter can kill per year.¹

Indiscriminate hunting, trapping, and lethal control are inhumane and ineffective

Many studies have demonstrated that the indiscriminate killing of coyotes is an ineffective approach to reducing populations and avoiding human-wildlife conflicts. Coyotes are highly intelligent and social animals that, when left unexploited, naturally limit their population density by establishing and defending non-overlapping territories and behaviorally suppressing breeding among subordinate members of their extended family group.

Coyotes often respond to disruptions in their social structure with compensatory measures such as increased breeding and in-migration of coyotes from other areas.² This is why lethal control often results in an increase in regional coyote populations.³ In addition, the loss of stable coyote populations can increase conflicts by opening territories to less experienced, juvenile dispersers that are more prone to pursue atypical food resources (such as garbage and small pets). Research from Cook County, Illinois, found that removing non-problem coyotes created openings for more human-tolerant individuals, increasing interactions and conflicts.⁴

Commission policy necessitates a change in the management of coyotes

One of the key points raised during WRC's discussions on promulgating new regulations for coyote management is the need for consistency between how the state manages the species and the Terrestrial Predator Policy that the Commission adopted in 2018.⁵ We note that Project Coyote participated in the development of that policy. We appealed to former Commission President Michael Sutton that a review of the state's predator-related statutes, regulations, and policies was needed since they had not been reviewed for decades and did not reflect the best currently

¹ Niemiec, R., Mertens, A., Crooks, K., Kogan, L., Seacor, R., & Santiago-Ávila, F. J. (2024). *United States Resident Survey on Animal Protection Issues and Policy Solutions: National Public Survey Report*. Colorado State University, University of California Berkeley, Project Coyote, Washington Wildlife First.

² Knowlton, F. F., Gese, E. M., & Jaeger, M. M., 1999, "Coyote depredation control: an interface between biology and management," *Journal of Range Management*, 52:398-412; Kilgo, J.C., C.E. Shaw, M. Vukovich, M.J. Conroy, and C. Ruth, 2017, "Reproductive Characteristics of a Coyote Population before and during Exploitation," *Journal of Wildlife Management*, 81 (8): 1386-93; Blejwas, K. M., B. N. Sacks, M. M. Jaeger, and D. R. McCullough, 2002, "The effectiveness of selective removal of breeding coyotes in reducing sheep predation," *Journal of Wildlife Management*, 66:451-62; Gese, Eric M, 2005, "Demographic and Spatial Responses of Coyotes to Changes in Food and Exploitation," *Proceedings of the Wildlife Damage Management Conference*, 11: 271-85.

³ Crabtree, R.L, and J.W. Sheldon, 1999, "The Ecological Role of Coyotes on Yellowstone's Northern Range," *Yellowstone Science*, 7(2):15-23; Margenau, L. L., R.E. Russell, A.T. Hanrahan, N.M. Roberts, J.L. Price Tack, and D.J. Storm, 2023, "Survival and cause-specific mortality of coyotes in Wisconsin. *Journal of Mammalogy*, 104(4), 833-845; Moll, R. J., A.M. Green, M.L. Allen, and R. Kays, 2024, "People or predators? Comparing habitat-dependent effects of hunting and large carnivores on the abundance of North America's top mesocarnivore," *Ecography*, e07390.

⁴ Fox, C.H., 2006, "Coyotes and humans: Can we coexist?" *Proceedings of the 22nd Vertebrate Pest Conference*, University of California, Davis. pp. 287-293; Fox, C.H., and C.M. Papouchis, 2005, "Coyotes in our Midst: Coexisting with an Adaptable and Resilient Carnivore," *Animal Protection Institute*; Gehrt, S.D., 2004, "Chicago coyotes part II," *Wildlife Control Technology*, 11(4): 20-21, 38-39, 42.

⁵ California Fish and Game Commission, "Wildlife Policies," <https://fgc.ca.gov/About/Policies/Wildlife> (accessed 4/1/25).

available science. The Commission appointed Dr. Rick Hopkins, a member of Project Coyote's Science and Ethics Advisory Board, to serve on the newly established WRC Terrestrial Predator Policy Working group.

The Terrestrial Predator Policy emphasizes the need for management of predators to be based on an "ecosystem-based management" approach. Yet the current classification of coyotes as a non-game animal does the opposite because it facilitates the indiscriminate killing of coyotes regardless of the resulting ecological impact. Coyotes play a crucial role in ecosystems by regulating rodent populations, enhancing songbird diversity, and contributing to ecological health and ecosystem regulation.⁶ In areas where coyotes serve the role of apex predator, their removal can precipitate an ecological chain reaction that leads to profound degradation of the health, integrity, and diversity of the ecosystem.⁷

Further, the current management of coyotes allows for their year-round, indiscriminate killing in direct contradiction of the Terrestrial Predator Policy, in particular:

- Protect and conserve predator populations.
- Adopt practices to ensure that predators are monitored, maintained, restored, and/or enhanced using the best available science.
- Rely on management strategies that avoid and reduce conflict and encourage the coexistence of humans and wildlife.

A regulated hunting season would improve coyote management

Currently, California wildlife managers have limited data on the state's coyote population. As noted in the staff summary of the January 15, 2024 WRC meeting, "there is little to no recent data on population trends for nongame mammals," which currently includes coyotes.

Promulgating new regulations to limit the currently indiscriminate take of coyotes would support the Department in better understanding the population, distribution, and health of California's coyote population by requiring hunters and trappers to tag and report their total take, which is

⁶ Crooks, K.R. and M.E. Soulé, 1999, "Mesopredator release and avifaunal extinctions in a fragmented system," *Nature*, 400: 563-566; Fedriani, J.M., T.K. Fuller, and R.M. Sauvajot, 2001, "Does availability of anthropogenic food enhances densities of omnivorous mammals? An example with coyotes in southern California," *Ecography*, 24: 325-331; Gehrt, S.D., 2004, "Chicago coyotes part II," *Wildlife Control Technology*, 11(4): 20-21, 38-39, 42; Gese, Eric M., 2005, "Demographic and Spatial Responses of Coyotes to Changes in Food and Exploitation," *Proceedings of the Wildlife Damage Management Conference*, 11: 271-85; Kays, R., R. Costello, T. Forrester, et al., 2015, "Cats Are Rare Where Coyotes Roam," *Journal of Mammalogy*, 96 (5): 981-87; Henke, S. E., and F. C. Bryant, 1999, "Effect of coyote removal on the faunal community in western Texas," *Journal of Wildlife Management*, 63:1066-1081.

⁷ Soulé, M. E., J.A. Estes, J., Berger, and C. Martinez del Rio, 2003, "Ecological effectiveness: Conservation goals for interactive species," *Conservation Biology*, 17(5), 1238-1250; Crooks, K.R., and M.E. Soulé, 1999, "Mesopredator release and avifaunal extinctions in a fragmented system," *Nature*, 400: 563-566; Gehrt S.D., E.C. Wilson, J.L. Brown, and C. Anchor, 2013, "Population Ecology of Free-Roaming Cats and Interference Competition by Coyotes in Urban Parks," *PLOS ONE* 8(9): e75718; Kays, R., R. Costello, T. Forrester, et al., 2015, "Cats Are Rare Where Coyotes Roam," *Journal of Mammalogy*, 96 (5): 981-87; Henke, S. E., and F. C. Bryant, 1999, "Effect of coyote removal on the faunal community in western Texas," *Journal of Wildlife Management*, 63:1066-1081.

already a standard practice for several other game species.⁸ Replicating this process for coyotes would provide considerable data on the health, sex, age, and location of California's coyote population. At least three other states with established coyote hunting seasons require hunters to tag and report coyotes: Massachusetts within 48 hours of take; Delaware by the end of the following day; and New Jersey by late evening on the day of harvest.⁹ In New Hampshire, coyote trappers are required to submit a report of their harvest to wildlife officials by the end of the season.¹⁰

In addition, requiring tagging and checking of coyotes would enable the Department to determine whether coyote hunters or members of the public are mistakenly killing wolves (including juveniles or pups). The Department recognizes the risk of misidentification between coyotes, an unprotected species, and wolves, a federally and state protected one, since the two canids share morphological characteristics.¹¹ California has invested considerable public resources in monitoring and protecting its relatively new but increasing population of wolves. Notably, legislation introduced in New York (one of the states with a regulated coyote hunting season) would require the checking of coyotes with wildlife managers specifically because of the risk of coyote-wolf misidentification.¹²

Regulatory mechanisms exist to guide a rulemaking on coyote policy

California has regulatory mechanisms in place that could be used to guide rulemaking to remove coyotes from the non-game species list and enact regulations that are in line with existing regulations for other species.

Existing hunting and trapping rules

As noted above, open-ended, persistent lethal "control" measures are not an effective way to reduce coyote numbers or conflicts. Yet California currently allows hunting and "damage control" trapping of an unlimited number of animals all year round. Notably, at least 25 states have

⁸ California Department of Fish and Wildlife, "Hunting tag reporting," <https://wildlife.ca.gov/Licensing/Hunting/Tag-Reporting> (accessed 4/1/25).

⁹ State of Massachusetts, "Coyote hunting regulations," <https://www.mass.gov/info-details/coyote-hunting-regulations#bag-limits->; State of Delaware, eRegulations, "Furbearer trapping and hunting," <https://www.eregulations.com/delaware/hunting/furbearer-trapping-hunting>; State of New Jersey, "Small game regulations," <https://dep.nj.gov/wp-content/uploads/njfw/digest-hunting-2022-2023-segment-57-60.pdf> (accessed 4/1/25).

¹⁰ New Hampshire Fish and Game Department, "Trapper's report," <https://www.wildlife.nh.gov/sites/g/files/ehbemt746/files/documents/trapper-report.pdf> (accessed 4/8/25).

¹¹ California Department of Fish and Wildlife, "Distinguishing between coyotes, wolves, and dogs," <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=102479&inline> (accessed 4/1/25).

¹² New York Senate bill S5402 and Assembly bill A1229, <https://www.nysenate.gov/legislation/bills/2025/S5402>. The legislation would facilitate the reporting of killed coyotes and require the Department of Environmental Conservation to conduct DNA tests on any animals weighing over 50 pounds. Eastern coyotes are larger than their western cousins and often have a significant proportion of wolf genes.

promulgated regulations, which include closed seasons for coyote hunting or trapping (or both) that apply statewide or in specific areas.¹³

California's current policy on coyotes stands in contrast to the state's well-established rules for the hunting and trapping of numerous big and small game species.¹⁴ In these cases, the state has detailed requirements and restrictions on closed/open seasons, bag limits, reporting requirements, and allowable hunting and trapping methods. These rules also take into account the need for geographic variability with regard to places where take is restricted, take limits, and the timing and duration of seasons.

Presumably, such detailed considerations have been established based on concern for maintaining resident wildlife populations, minimizing the risk of destabilizing ecosystems, and harm to non-target animals. The Department clearly possesses the expertise and capacity to determine where, when, and how to permit hunting and trapping of a variety of wildlife species that have different habitats, biology, and ecological roles; the same expertise could be applied to the regulation of coyote hunting.

Current approaches to wildlife conflict

The Commission has well-developed policies to address the management of wildlife that cause damage to property or are involved in situations that pose a risk to human safety. Applying a similar approach to coyotes would reflect the Department's overall commitment to science-based conflict reduction.

Currently, the Department's Wildlife Watch program provides the public with extensive information on the proper identification and management of encounters, nuisance incidents, and property damage involving coyotes.¹⁵ Wildlife Watch "empowers local agencies and residents to address and resolve human-wildlife conflicts in their own community" by providing support and training. It encourages communities and local governments to utilize effective non-lethal conflict strategies specific to their needs and conditions, with emphasis placed on respect for wildlife and use of scientific facts.

Project Coyote has partnered directly with human-wildlife conflict specialists at the Department to provide proper guidance to local residents and officials on coyote coexistence—a role that we would be able to continue should the state's regulatory framework for coyotes change. However, the significant accomplishments of the Wildlife Watch program and the engagement of experts at the Department and partner organizations are being undermined by the current classification of coyotes as a non-game species. Because the classification allows for indiscriminate killing by individuals and municipalities, it directly contradicts the Department's own guidance and public engagement efforts on conflict mitigation.

¹³ Based on Project Coyote's review of state regulations, current as of March 2025. States with closed hunting and trapping seasons include AK, AR, AZ, DE, IN, MA, MI, NJ, NY, VA, VT; states with closed seasons for trapping include CT, IA, IL, KY, LA, ME, MD, MO, NC, NH, PA, WA, WI, WV.

¹⁴ California Code of Regulations, Title 14, Subdivision 2, Chapter 2 (Resident Small Game) and Chapter 3 (Big Game).

¹⁵ CA Department of Fish and Wildlife, "Human-Wildlife Conflicts: Coyotes," <https://wildlife.ca.gov/HWC/Coyotes#600234065-outdoor-safety-tips> (accessed 4/1/25).

The California Code of Regulations Title 14 §401 (Issuance of Permit to Take Animals Causing Damage) helps reduce the indiscriminate killing of animals by requiring residents experiencing damage to their land or property to seek a depredation permit before take occurs. It currently covers eight large and small game, nongame, and furbearer species.

WRC could follow this approach through new requirements that residents seeking to kill a coyote due to property damage would first need to demonstrate that they have made an effort to use non-lethal and less-lethal methods to prevent damage and have plans to avoid the same problems in the future.¹⁶ Notably, this action would not preclude the use of lethal methods to kill individual animals (including coyotes) that have attacked humans directly and are deemed to be a risk to public safety.¹⁷ Nor would it interfere with residents' ability to use hazing—a recognized and effective non-lethal method for discouraging coyotes from frequenting human-dominated areas.¹⁸

The Department defines hazing as “a process designed to scare animals away and instill in them a fear of humans” and provides associated steps for residents to follow.¹⁹ Similar strategies are recommended for black bears in California to discourage the species from frequenting backyards and other human-dominated spaces. When proper techniques are used that do not injure or kill animals, hazing is an effective way to deter conflicts before they worsen, or individual animals become fully habituated to human neighborhoods, farms, ranches, and food sources.

In closing, we thank the WRC and Commission for the time and thought invested in discussions on California's nongame species. We strongly support WRC's conclusion that changes are needed in how coyotes and human-coyote conflicts are managed and encourage the Commission to proceed with a rulemaking process. This process will align California's wildlife policies and regulations with the best available science and ultimately ensure a more ethical and effective approach to coyote management.

Respectfully submitted,



Camilla H. Fox
Founder & Executive Director



David Parsons
Science & Ethics Advisory Board Member

¹⁶ See requirements under Title 14 §401 (c)(G) and (H).

¹⁷ For example, as outlined in CA Department of Fish and Wildlife, “Public Safety Wildlife Guidelines 2072,” <https://mountainlion.org/wp-content/uploads/2021/01/CA-L-CDFG-Public-Safety-Wildlife-Guidelines-2072.pdf>, (accessed 4/18/25).

¹⁸ G. Lajeunesse, H.W. Harshaw, and C.C. St. Clair, “Urban coyotes were observed rarely and retreated consistently from assertive approaches by volunteers in neighborhoods,” *PLoS One*, 2025; L. White and A. Delaup, “A new technique in coyote conflict management: changing coyote behavior through hazing in Denver, Colorado,” *Proceedings of the Wildlife Damage Management Conference*, 2012; Bonnell, M. A., & Breck, S. W. 2017, “Using resident-based hazing programs to reduce human-coyote conflicts in urban environments,” *Human-Wildlife Interactions*, 11(2), 146–155; Breck, S. W., Poessel, S. A., & Bonnell, M. A., 2017, “Evaluating lethal and nonlethal management options for urban coyotes,” *Human-Wildlife Interactions*, 11(2), 133–145.

¹⁹ CA Department of Fish and Wildlife, Outdoors Q & A, “Urban Coyotes,” <https://wildlife.ca.gov/language/en%20US/COQA/tag/hazing> (accessed 4/1/25).



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May 2, 2025

Erika Zavaleta, Chair
Darius W. Anderson, Chair
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Fish and Game Commission
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Via: fgc@fgc.ca.gov

RE: Support for New Coyote Take Recommendations (May 15th Agenda Item 4)

Chairpersons Zavaleta, Anderson and members of the Wildlife Resources Committee:

Citizens for Los Angeles Wildlife (CLAW) is a non-profit environmental organization concerned with the wellbeing of wildlife and wildlife habitat for the City of Los Angeles and beyond. A citizenry of more than 5,000 individuals support our organization's multiple calls for practices and policy to benefit biodiversity in LA City, County, California and the globe. CLAW supports the WRC's recommendation to remove the non-game classification for coyotes.

As identified by California's Terrestrial Predator Policy, coyotes have an intrinsic value that benefits both the ecosystem and society. This policy explicitly states that species in the Order Carnivora, which includes coyotes, should be protected and conserved using "the best available science." Today's best available science clearly shows that indiscriminately killing coyotes is not only ineffective, but may lead to coyote population growth and increased human-wildlife conflict. As the social structure of coyote packs breaks up due to killed coyotes, subdominant coyotes have more opportunity to procreate. There are a number of non-lethal alternative methods that effectively reduce human-wildlife conflict, such as excluding or removing food sources, and supervising pets while outdoors. Removing a "nongame" designation for coyotes would have the additional benefit of restricting the killing of coyotes during breeding season, reducing the unethical take of animals who may be providing for young pups.

Currently, animals considered "nongame" in California include invasive species such as European starlings and house sparrows. These are non-native species that have been shown to outcompete native species. Coyotes, on the other hand, are native to California, and have a long history both ecologically and culturally on this land. As such, they should be conserved just like any other native species.

Eleven states already have closed hunting seasons for coyotes, which means we are seeing the rare condition where California is not a leader in science-based animal conservation. And indeed, current state policy is counter to public opinion, according to a 2024 national survey in which over 80% of respondents supported a limited cap on carnivore hunting.

This proposed change is a step in the right direction for California's wildlife policy. We thank you for your consideration in moving this policy forward and conserving our native canines.

Sincerely,

A handwritten signature in black ink, appearing to read "Tony T.", is centered within a light gray rectangular box.

Tony Tucci, Chair



Formerly called the Humane
Society of the United States and
Humane Society International

May 2, 2025

TO: The California Fish and Game Commission, Wildlife Resources Committee
RE: Coyote rule proposal
Position: Support

Members of the Wildlife Resources Committee:

On behalf of our California members and supporters, Humane World for Animals—formerly called the Humane Society of the United States—supports proposed rulemaking to remove coyotes from the broad take provisions of California Code of Regulations, Title 14, Division 1, Subdivision 2, Chapter 6, Section 472, and establishing regulations for their hunting and management.

Coyotes are native to California and vital to our state's ecosystems. Allowing the indiscriminate and unlimited killing of coyotes runs counter to sound science and to Californians' humane values. Rather than mass killing coyotes—which never works—we must instead focus on more humane and effective methods for minimizing rare conflicts with them. Additionally, establishing protections for coyotes would bring us in line with other states that have established coyote hunting seasons or regulations, and with Commission policies, which dictate that the Commission should protect and conserve coyotes according to the best available science and with the goal of coexistence in mind.

- **The current lack of protection for coyotes conflicts with California Fish & Game Commission's Terrestrial Predator Policy.**

Unlimited and indiscriminate killing of coyotes fails to comport with the Terrestrial Predator Policy, which is a policy that requires the Commission to recognize the ecological and intrinsic value of coyotes and other native terrestrial carnivores and to use the best available science to minimize conflicts with coyotes using humane and effective management strategies with the ultimate goal of long-term conservation and coexistence. Mass killing of coyotes is inhumane and counterproductive, according to sound wildlife biology.

The Terrestrial Predator Policy states that native terrestrial predators, including coyotes, "are an integral part of California's natural wildlife and possess intrinsic, biological, historical, and cultural value, which benefit society and ecosystems." According to the policy, the Commission must "promote the ecological, scientific, aesthetic, recreational, and educational value of native terrestrial predators in the context of ecosystem-based management, while minimizing adverse impacts on wildlife and reducing conflicts that result in adverse impacts to humans" and recognize that "sustainable conservation and management strategies are necessary to encourage the coexistence of humans and wildlife." The policy goes on to state that coyote populations be maintained "using the best available science" that recognizes "the ecological interactions between predators and other wildlife species and consider all available management tools, best available science, affected habitat, species, and ecosystems and other factors." Finally, the policy requires "management strategies that avoid and reduce conflict," "minimize habituation of predators" and consider "various forms of lethal and nonlethal controls that are efficacious" and "humane" to "ensure long-term conservation of predators and co-existence with humans and wildlife."

As detailed in these comments, indiscriminate killing of coyotes will not reduce their populations over the long term, prevent conflicts with livestock, or boost game species numbers. In fact, the best available science shows that random killing of coyotes can *increase* their numbers and *increase* conflicts with livestock. Furthermore, killing coyotes during pup-rearing season may orphan dependent pups, leaving them to die from predation, exposure, or starvation.

Establishing protections for coyotes will encourage the development of more effective and humane methods for managing coyotes and preventing conflicts. Prevention and mitigation—not lethal control—

are the best methods for minimizing conflicts with coyotes.¹ Eliminating access to easy food sources, such as bird seed and garbage, supervising dogs while outside, and keeping cats indoors reduces conflicts with pets and humans. Practicing good animal husbandry and using strategic nonlethal predator control methods to protect livestock (such as electric fences, guard animals, and removing dead livestock) are more effective than lethal control in addressing coyote-human conflicts.²

- **The unlimited killing of coyotes does not reduce their numbers, and could even increase them.**

Since 1850 when mass killings of coyotes began in the U.S., their range has tripled.³ The science is clear: The persecution of coyotes disrupts their social structure, which encourages more breeding and migration, and ultimately results in more coyotes.⁴ Moll et al. (2025) affirm this by stating, "Coyote abundance was higher where human hunting was permitted These findings expand results from local studies suggesting that directly hunting coyotes does not decrease their abundance and may actually increase it."⁵

In other words: *Coyote biologists find that increasing the killing of coyotes will accomplish nothing except to potentially increase the coyote population.*

- **The year-round killing of coyotes does not prevent livestock conflicts, and could even exacerbate them.**

Top carnivore biologists and wildlife agencies across the country have found that indiscriminate killing of coyotes can cause their numbers to grow and can escalate conflicts with livestock. The scientific evidence shows that random killing is counterproductive because it disrupts the sensitive coyote pack structure that allows them to self-regulate their populations and their hunting behavior.⁶ Moll et al. (2025) write: "Human hunting has had surprising effects on coyote abundance, as the local removal of animals seems to be quickly compensated for by increased immigration and breeding, resulting in neutral or even positive effects on local populations (Henke and Bryant 1999, Gulsby et al. 2015, Kays et al. 2017)."⁷ As

¹ Fox, C.H. and C.M. Papouchis. 2005. Coyotes in Our Midst: Coexisting with an Adaptable and Resilient Carnivore. Animal Protection Institute, Sacramento, California.

² Adrian Treves et al., "Forecasting Environmental Hazards and the Application of Risk Maps to Predator Attacks on Livestock," *BioScience* 61, no. 6 (2011); Philip J. Baker et al., "Terrestrial Carnivores and Human Food Production: Impact and Management," *Mammal Review* 38, (2008); A. Treves and K. U. Karanth, "Human-Carnivore Conflict and Perspectives on Carnivore Management Worldwide," *Conservation Biology* 17, no. 6 (2003); J. A. Shivik, A. Treves, and P. Callahan, "Nonlethal Techniques for Managing Predation: Primary and Secondary Repellents," *Conservation Biology* 17, no. 6 (2003); N. J. Lance et al., "Biological, Technical, and Social Aspects of Applying Electrified Fladry for Livestock Protection from Wolves (*Canis Lupus*)," *Wildlife Research* 37, no. 8 (2010); Andrea Morehouse and Mark Boyce, "From Venison to Beef: Seasonal Changes in Wolf Diet Composition in a Livestock Grazing Environment," *Frontiers in Ecology and the Environment* 9, no. 8 (2011).

³ Robert Crabtree and Jennifer Sheldon, "Coyotes and Canid Coexistence in Yellowstone," in *Carnivores in Ecosystems: The Yellowstone Experience*, ed. T. Clark et al. (New Haven [Conn.]: Yale University Press, 1999)

⁴ F. F. Knowlton, E. M. Gese, and M. M. Jaeger, "Coyote Depredation Control: An Interface between Biology and Management," *Journal of Range Management* 52, no. 5 (1999); Robert Crabtree and Jennifer Sheldon, "Coyotes and Canid Coexistence in Yellowstone," in *Carnivores in Ecosystems: The Yellowstone Experience*, ed. T. Clark et al. (New Haven [Conn.]: Yale University Press, 1999); J. M. Goodrich and S. W. Buskirk, "Control of Abundant Native Vertebrates for Conservation of Endangered Species," *Conservation Biology* 9, no. 6 (1995).

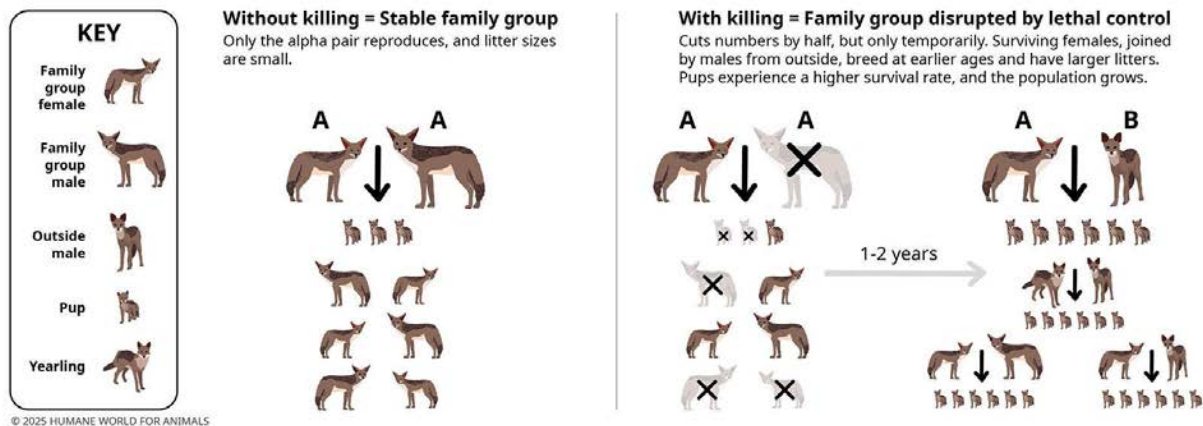
⁵ Remington J. Moll et al., "People or predators? Comparing habitat-dependent effects of hunting and large carnivores on the abundance of North America's top mesocarnivore," *Ecography* 2025, no. 1 (2025).

⁶ Randy Comeleo, "Using Coyotes to Protect Livestock. Wait. What?," Oregon State University: OSU Extension Service (June 2018), <https://extension.oregonstate.edu/animals-livestock/sheep-goats/using-coyotes-protect-livestock-wait-what>

⁷ Moll et al., "People or predators? Comparing habitat-dependent effects of hunting and large carnivores on the abundance of North America's top mesocarnivore."

lethal control causes coyote populations to expand, coyotes are forced to find larger and easier prey, like sheep, to feed bigger litters of pups.⁸ See: *Figure 1*

Figure 1



Further, most coyotes do not prey on livestock; USDA data show that *all carnivores combined* are responsible for less than 0.5% of sheep and cattle losses in the U.S.⁹

Coyotes are also beneficial to farmers and ranchers. They eat rodents and other animals that damage crops and scavenge animal carcasses. Stable coyote packs can even serve as guardian animals that deter other predating animals.¹⁰

- **The year-round killing of coyotes, predator control and bounties do not increase populations of game species.**

The best available science demonstrates that killing native carnivores to increase ungulate populations is unlikely to produce positive results because the key to ungulate survival is protecting breeding females and ensuring herds have access to adequate nutrition.¹¹ A 2019 study that evaluated deer hunting numbers in six eastern U.S. states found that coyotes are not limiting deer numbers and that coyote removal programs do little to increase deer in the region.¹²

⁸ *Id.*; see also, Draheim, Megan. M. "Why Killing Coyotes Doesn't Make Livestock Safer." *Scientific American*, May 31, 2017 at www.scientificamerican.com/article/why-killing-coyotes-doesn-t-make-livestock-safer/

⁹ "Cattle and Calves Death Loss in the United States Due to Predator and Nonpredator Causes, 2015." USDA-APHIS-VS-CEAH, www.aphis.usda.gov/animal_health/nahms/general/downloads/cattle_calves_deathloss_2015.pdf; "Sheep and Lamb Predator and Nonpredator Death Loss in the United States, 2015," USDA-APHIS-VS-CEAH-NAHMS, www.aphis.usda.gov/animal_health/nahms/sheep/downloads/sheepdeath/SheepDeathLoss2015.pdf

¹⁰ "Using Coyotes to Protect Livestock. Wait. What?" *supra* note 4.

¹¹ Bishop, C. J., G. C. White, D. J. Freddy, B. E. Watkins, and T. R. Stephenson. 2009. Effect of Enhanced Nutrition on Mule Deer Population Rate of Change. *Wildlife Monographs*:1-28; Hurley, M. A., J. W. Unsworth, P. Zager, M. Hebblewhite, E. O. Garton, D. M. Montgomery, J. R. Skalski, and C. L. Maycock. 2011. Demographic Response of Mule Deer to Experimental Reduction of Coyotes and Mountain Lions in Southeastern Idaho. *Wildlife Monographs*:1-33.; Forrester, T. D. and H. U. Wittmer. 2013. A review of the population dynamics of mule deer and black-tailed deer *Odocoileus hemionus* in North America. *Mammal Review* 43:292-308.; Monteith, K. L., V. C. Bleich, T. R. Stephenson, B. M. Pierce, M. M. Conner, J. G. Kie, and R. T. Bowyer. 2014. Life-history characteristics of mule deer: Effects of nutrition in a variable environment. *Wildlife Monographs* 186:1-62.

¹² Eugenia V. Bragina, Roland Kays, Allison Hody, Christopher E. Moorman, Christopher S. Deperno, L. Scott Mills (2019), Effects on white-tailed deer following eastern coyote colonization. *Jour. Wild. Mgmt.*, 83: 916-924. <https://doi.org/10.1002/jwmg.21651>

Similarly, in response to concerns by deer hunters about the perceived effect of coyotes on small game populations, the Pennsylvania Game Commission stated, “After decades of using predator control (such as paying bounties) with no effect, and the emergence of wildlife management as a science, the agency finally accepted the reality that predator control does not work,” and that “[predators] don’t compete with our hunters for game. The limiting factor is habitat—we must focus our efforts on habitat.”¹³

The National Wild Turkey Federation states, “Ultimately, the long-term solution to wild turkey populations is not dependent on predator control, but on man’s activities and good habitat management.”¹⁴ Ducks Unlimited adds, “Predator control cannot result in meaningful increases in duck numbers or birds in the bag and threatens to undermine the broad coalition of public support on which modern waterfowl conservation depends.”¹⁵ And the respected hunting organization the Izaak Walton League of America says in its position statement, “The League recognizes the intrinsic value of predatory species and their important ecological roles. ... There is no justification for widespread destruction of animals classified as predators ... The League opposes payment of bounties on predators or varmints.”¹⁶

The Mississippi Flyway Council, established in 1952 to coordinate the management of migratory game birds in that region, says, “The Mississippi Flyway Council (MFC) does not support the practice of predator removal as a viable management practice to improve waterfowl recruitment over the long-term or over large geographic areas. The MFC believes that the highest conservation priorities for improving waterfowl recruitment are the landscape-scale wetland and grassland habitat restoration strategies advocated by the North American Waterfowl Management Plan.”¹⁷

- **The indiscriminate and random killing of coyotes removes an ecologically important species from the landscape.**

Coyotes are an integral part of healthy ecosystems, providing a number of free, natural ecological services. By consuming their preferred prey of rodents and rabbits, they help to control disease transmission by curtailing the spread of tick-borne diseases like Lyme¹⁸ or chronic wasting disease.¹⁹ Coyotes also clean up carrion, remove sick animals from the gene pool, and protect crops and gardens. They balance their ecosystems and have trophic-cascade effects such as indirectly protecting ground-nesting birds from smaller carnivores and increasing the biological diversity of plant and wildlife communities.²⁰

¹³ Bob Frye. “Habitat, not predators, seen as key to wildlife populations.” *Trib Live*, July 25, 2016.

<https://archive.triblive.com/sports/outdoors/habitat-not-predators-seen-as-key-to-wildlife-populations/>.

¹⁴ James Earl Kennamer, Ph.D. “Wild Turkeys and Predators.” The National Wild Turkey Federation, August 25, 2021 at www.nwtf.org/content-hub/wild-turkeys-and-predators

¹⁵ Chuck Petrie: “Prairies Under Siege: Ducks, Habitat Conservation & Predators.” Ducks Unlimited Magazine, November/December 2003 at <https://duckscdn.blob.core.windows.net/imagescontainer/landing-pages/conservation/conservation-facts/ducks-and-predators-lowres.pdf>

¹⁶ The Izaak Walton League of America: “Conservation Policies 2022,” pg. 54 <https://www.iwla.org/docs/default-source/about-iwla/2022-policy-book-final.pdf>

¹⁷ Resolution by the Technical Section of the Mississippi Flyway Council, February 21, 2003.

¹⁸ Hofmeester TR, Jansen PA, Wijnen HJ, Coipan EC, Fonville M, Prins HHT, Sprong H, van Wieren SE. Cascading effects of predator activity on tick-borne disease risk. *Proc Biol Sci*. 2017 Jul 26;284(1859):20170453. doi: 10.1098/rspb.2017.0453. PMID: 28724731; PMCID: PMC5543215.

¹⁹ See e.g., Luis E. Escobar et al., “The ecology of chronic wasting disease in wildlife,” *Biological Reviews* 95, no. 2 (2020); Gabriel M. Barrile et al., “Chronic wasting disease alters the movement behavior and habitat use of mule deer during clinical stages of infection,” *Ecology and Evolution* 14, no. 5 (2024).

²⁰ S. E. Henke and F. C. Bryant, “Effects of Coyote Removal on the Faunal Community in Western Texas,” *Journal of Wildlife Management* 63, no. 4 (1999); K. R. Crooks and M. E. Soule, “Mesopredator Release and Avifaunal Extinctions in a Fragmented System,” *Nature* 400, no. 6744 (1999); E. T. Mezquida, S. J. Slater, and C. W. Benkman, “Sage-Grouse and Indirect Interactions: Potential Implications of Coyote Control on Sage-Grouse Populations,” *Condor* 108, no. 4 (2006); N. M. Waser et al., “Coyotes, Deer, and Wildflowers: Diverse Evidence Points to a Trophic Cascade,” *Naturwissenschaften* 101, no. 5 (2014); and Maine Woodland Owners

Additionally, the killing of coyotes during late spring greatly increases the chance of dependent pups being orphaned, leading to their slow death from starvation. Litters of pups born in the spring in California are still dependent on both parents until weaning and remain under the care and guidance of their parents as they learn to hunt and become independent.

- **Californians, and most Americans, do not support wildlife killing practices that they find to be inhumane or outdated, or that violate longstanding principles of fairness and respect for the hunted.**

The National Shooting Sports Foundation, in a national survey with Responsive Management, found that, while Americans are still supportive of hunting in general, approval varies considerably depending on the stated reason for that hunting. If it's utilitarian in nature, for meat, or to obtain organic or locally sourced food, public approval is very high. But the survey goes on to say, "...approval of hunting drops substantially when the reasons are for the sport, the challenge, or a trophy." There were similarly low approval numbers for motivations for trapping that included to make money, for fur clothing, and for recreation.²¹

Further, researchers find that the American public's attitudes toward historically misunderstood and persecuted species like coyotes have improved dramatically—in fact, positive attitudes toward coyotes grew by 47 percent between 1978 and 2014, with the majority of respondents expressing positive attitudes toward them.²²

Americans increasingly care about wildlife. A keystone study, the *America's Wildlife Values* project, has documented a substantial shift in public attitudes away from a *traditionalist* view of wildlife, a view of human mastery over wildlife and that wildlife should be managed for human benefit, and toward a *mutualist* view of wildlife, or the belief that humans and wildlife should coexist and that the welfare of animals is important.²³ That same study found that nearly three times as many Californians embrace a mutualist view of wildlife as those who have a traditionalist view.²⁴ The Association of Fish & Wildlife Agencies and the Wildlife Management Institute have noted these studies and underscored the need for state wildlife management agencies to appeal to a broader constituency to ensure that the agencies remain influential in the future.²⁵

- **California's wildlife is a public trust asset, and the viewpoints of all state residents should be respected.**

In its *2022 National Survey of Fishing, Hunting, and Wildlife-Associated Recreation*, the U.S. Fish and Wildlife Service reported that non-consumptive public land users outnumber and outspend hunters by a

Association, "3 Ways Coyotes Are Good For the Ecosystem" at <https://www.mainewoodlandowners.org/articles/3-ways-coyotes-are-good-for-the-ecosystem>.

²¹ Responsive Management and the National Shooting Sports Foundation (2019): "Americans' attitudes toward hunting, fishing, sport shooting, and trapping."

https://www.fishwildlife.org/application/files/7715/5733/7920/NSSF_2019_Attitudes_Survey_Report.pdf

²² Kelly A. George, Kristina M. Slagle, Robyn S. Wilson, Steven J. Moeller, Jeremy T. Bruskotter. "Changes in attitudes toward animals in the United States from 1978 to 2014," *Biological Conservation*, Volume 201, 2016. Pages 237-242, ISSN 0006-3207, <https://doi.org/10.1016/j.biocon.2016.07.013>.

²³ Manfredo, M.J., Sullivan, L., Don Carlos, A.A., Dietsch, A.M., Teel, T.L., Bright, A.D., & Bruskotter, J. (2018). *America's Wildlife Values: The Social Context of Wildlife Management in the U.S.* National report from the research project entitled "America's Wildlife Values." Fort Collins, CO: Colorado State University, Department of Human Dimensions of Natural Resources. <https://sites.warnercnr.colostate.edu/wildlifevalues/wp-content/uploads/sites/124/2019/01/AWV-National-Final-Report.pdf>

²⁴ Id.

²⁵ The Association of Fish & Wildlife Agencies and the Wildlife Management Institute: *The Fish and Wildlife Agency Relevance Roadmap (v1.0); Enhanced Conservation Through Broader Engagement*. September 2019 at https://www.fishwildlife.org/application/files/2515/7547/9977/Fish_Wildlife_Relevancy_Roadmap_Final_12-04-19-lowres.pdf

wide margin nationwide. Wildlife watchers now outspend hunters by almost 6 to 1 (5.54 to 1) and outnumber hunters 10 to 1.²⁶

Non-consumptive public land users in California outnumber and outspend hunters and trappers by a wide margin. The National Park Service reports, "In 2023, 36.2 million park visitors spent an estimated \$3.2 billion in local gateway regions while visiting National Park Service lands in California. These expenditures supported a total of 39.7 thousand jobs, \$2.0 billion in labor income, \$3.2 billion in value added, and \$5.1 billion in economic output in the California economy."²⁷

And according to the U.S. Bureau of Economic Analysis in the Dept. of Commerce, outdoor recreation in California generated more than \$81 billion for the state's economy in 2023. Of that figure, hunting and trapping generated only 0.3%. Spending for other outdoor recreation in California was nearly 71 times that amount, and for travel and tourism, more than 110 times.²⁸ See: *Figure 2*

Figure 2

Outdoor recreation spending in California (2023) From: U.S. Bureau of Economic Analysis		
Sample activities	Spending (in thousands of dollars)	% of total
Hunting and trapping	257,711	0.3
RVing	1,994,793	2.4
Other outdoor recreation ²⁹	18,223,258	22
Travel and tourism	28,385,498	35
Total Outdoor Recreation	81,495,632	100.00

For all of the reasons stated above, we ask for this committee's support of the proposal to update and modernize coyote management in California. Coyotes have intrinsic value and provide our communities with vital ecosystem benefits. We must begin treating them with respect, using ethics and the best available science to promote their well-being and to prevent conflicts with them for the benefit of both humans and coyotes.

Respectfully submitted,

Jenny Berg
California state director
jberg@humaneworld.org

²⁶ U.S. Department of the Interior, U.S. Fish and Wildlife Service (Sep. 2023), *2022 National Survey of Fishing, Hunting, and Wildlife-Associated Recreation*.
<https://digitalmedia.fws.gov/digital/collection/document/id/2321/rec/1>

²⁷ National Park Service, "National Park Service Visitor Spending Effects Report,"
<https://www.nps.gov/subjects/socialscience/vse.htm> (2022).

²⁸ U.S. Bureau of Economic Analysis, "[SAOACTVA Outdoor recreation satellite account activities - value added](#) ¹" (accessed Wednesday, April 30, 2025).

²⁹ The BEA defines this as amusement/water parks, festivals, sporting events, concerts, field sports, golfing and tennis.

From: Philip Steir [REDACTED]

Sent: Friday, May 2, 2025 8:05 AM

To: FGC <FGC@fgc.ca.gov>

Subject: Re: WRC Agenda Item #4- "Take of coyotes" - Support for ending indiscriminate killing/nongame status of Coyotes in CA

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May 1, 2025

Wildlife Resources Committee

Submitted via email: fgc@fgc.ca.gov

Re: WRC Agenda Item #4- "Take of coyotes" - Support for ending indiscriminate killing/nongame status of Coyotes in CA

Dear WRC Committee,

My name is Philip Steir, and I'm a resident of San Francisco. I strongly support the WRC in moving forward to remove coyotes from the non-target species classification and afford them some protection through a rulemaking process.

As a resident of San Francisco, I frequently see coyotes. Our city has done a stellar job in public education and outreach, with signage all over the city explaining how to mitigate negative encounters. In addition, our city posts signs during the pupping season to warn people to walk their dogs on leashes, avoid denning areas, and refrain from feeding wildlife. Overall, our city peacefully coexists with our coyote neighbors, which is fitting for the city named after Saint Francis of Assisi, the patron saint of animals.

We did experience one unusual occurrence in 2024, where an individual coyote started chasing and attacking tiny dogs in Crissy Field near the Presidio in San Francisco. As was pointed out in multiple media outlets, this area requires that people walk their dogs on leashes. However, there are frequent violators of this leash law, as several animal control officers were quoted as saying in the media. In addition, people were feeding the coyotes, despite warning signs against this behavior.

Ultimately, the one coyote, which was documented as chasing and attacking small dogs, was lethally removed, and the problem behavior in the area immediately stopped.

I point this out because in previous WRC meetings, claims have been made that it is impossible to target a problem coyote, and this is not the case, as demonstrated by this situation where the offending animal was identified and selectively removed.

It's also important to note that this was a very rare occurrence;. At the same time, coyote-dog conflicts do occur in San Francisco, most often these conflicts are the result of off-leash dogs chasing coyotes and instigating the conflicts- and rarely does it result in a dog fatality- as publicly reported by the San Francisco Animal Care and Control to the media.

The city of San Francisco works closely with Project Coyote to offer presentations on living with coyotes in hotspot communities and workshops on effective hazing and conflict resolution with our wild neighbors. Most San Francisco residents appreciate that we share our neighborhoods with wild animals. Coexistence is the norm. And that has resulted from multiple agencies and organizations working together to ensure residents are well-informed and understand how to mitigate negative encounters.

I appreciate knowing that coyotes live in my neighborhood of Russian Hill and help keep the rodent population down. It's an absolute thrill to have the opportunity to occasionally glimpse a wild coyote in this urban space.

It is unconscionable to allow native species like coyotes to be killed indiscriminately 24/7. Moreover, this approach completely contradicts the commission's own adopted terrestrial mammal policy that recognizes the ecological and intrinsic value of this critically important wild carnivore.

I strongly support the WRC's proposal to remove coyotes from the non-game list of animals and afford them the protection other native species in California are afforded.

Thank you for the opportunity to comment on this important issue.

Philip Steir
San Francisco, California

[REDACTED]
[REDACTED]

From: Sherry Simmons [REDACTED]

Sent: Friday, May 2, 2025 1:45 PM

To: FGC <FGC@fgc.ca.gov>

Subject: Please support WRC recommendation to remove coyotes' non game classification

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Hello,

I strongly support wise and humane conservation of coyotes.

The Wildlife Resources Committee is right to recommend that new regulations be developed for coyote management and an end to their treatment as a “non-game” animal. WRC has made clear that California needs to end the indiscriminate killing of coyotes and find ways to reduce human-wildlife conflicts and better manage coyote populations. The continued treatment of coyotes under the “non-game” animal category contradicts California’s Terrestrial Predator Policy, which directs the Commission to protect and conserve carnivores and ensure that they are monitored and maintained using the best available science, while recognizing their “ecological” and “intrinsic” value as a native predator of California.

Science and decades of experience have shown that the indiscriminate killing of coyotes doesn’t work to reduce numbers and instead destabilizes packs and natural environments. Coyote management based on coexistence strategies and limited lethal control are far more effective.

California lags behind other states that have established closed seasons for coyote hunting and trapping. In a 2024 national public opinion survey, over 80% of nationwide respondents said they want limited hunting seasons for wild carnivores and a cap on the number of animals an individual can kill per year.

Proposed coyote hunting and trapping rules would support California’s wildlife management goals by replacing the current year-round open season with a more limited season. This would give coyotes a much-needed reprieve during critical breeding and pupping seasons, and require reporting of the animals killed. This change would not prevent lethal control measures in proven cases of property damage or risks to health and safety (just like with bears and other wildlife).

California has a strong basis for a rulemaking on coyotes and would not have to “reinvent the wheel.” There are many hunting and trapping regulations and wildlife management policies already in place to guide this process going forward.

I am proud to live in a state that uses science-based methods to humanely work with wildlife and specifically predators - instead of inaccurate, emotionally based, illogical approaches. Please base this decision on the science - indiscriminate, uncontrolled year-round killing of coyotes makes no sense and doesn't control any problems that arise of coyotes.

Thank you,
Sherry Simmons

[REDACTED]
[REDACTED]

From: Keli Hendricks [REDACTED]
Sent: Thursday, May 1, 2025 5:48 PM
To: FGC <FGC@fgc.ca.gov>
Subject: Re: take of coyotes

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

To Wildlife Resource Committee Members;

My name is Keli Hendricks and I am the Ranching With Wildlife Coordinator for Project Coyote. I also live on a cattle ranch where my husband has managed the cow/calf operation for the last 30 years. Over these years we have successfully raised thousands of calves alongside coyotes and other predators without the use of lethal controls.

We appreciate the coyotes for the free, eco friendly rodent and rabbit control they provide for our pastures and we know that killing coyotes disrupts their pack structure and leads to conflicts. We know that animals that are forced to live in war zones are more desperate and likely to behave in unpredictable ways. Stable coyote packs behave predictably and benefit our operation.

I am also VP of Little Trooper Ranch, a dog rescue that specializes in rescuing and rehoming small dogs. I am also a long time volunteer with Sonoma County Wildlife Rescue, and I serve on the Sonoma County Fish and Game Commission.

I do all this work on a volunteer basis because I am committed to helping people, and our pets and livestock, coexist safely with wildlife.

If I can raise pets and livestock safely around wildlife, I know anyone can, and I have devoted the last 15 years of my life to helping others do so as well.

The fact is that many, if not most, conflicts with wildlife are preventable with the use of proactive, non lethal tools, good livestock husbandry techniques, and simple behavioral changes by pets owners and the public.

Even if it were possible to get rid of every coyote, ranchers would still need to tend to their herds and owners would still need to supervise their small pets because our small pets and livestock still face disease, car strikes, attacks from other domestic animals and many other dangers. Killing coyotes doesn't eliminate the burden of being responsible stewards of our lands and animals.

Furthermore, ending the unlimited killing of coyotes doesn't preclude the taking of problem coyotes. In all my years living, working and ranching with coyotes, I have yet to run into a problem coyote myself. However, I know it can happen. But the reality is problem coyotes are extraordinarily rare and can almost always be traced back to humans feeding coyotes, or coyotes facing other negative interactions with humans.

Finally, I was on the Terrestrial Predator Policy Working Group and I attended many meetings in Sacramento over many, many months, and spent hours helping to draft that policy. Unlimited killing of coyotes is not recognizing them for their ecological and intrinsic value as set forth in our mission statement.

Thank you for your time,

Keli Hendricks

KELI HENDRICKS - PROJECT COYOTE
Ranching with Wildlife Coordinator

[REDACTED]

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From: Katherine Kelly <user@votervoice.net>
Sent: Wednesday, April 30, 2025 12:27 PM
To: FGC <FGC@fgc.ca.gov>
Subject: Oppose Any Changes to Coyote Hunting and Management Practices

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Dear Commissioners and Bonham,

As a proud conservationist and advocate for Safari Club International, I am writing in opposition to any change to Fish and Game Code Section 472 or any other section that would eliminate the ability to hunt or take coyotes year-round. The coyote population is abundant and increasing according to both private and public biologists. Establishing limited seasons and bag limits is therefore not justified by the science and is a diversion of the Department's resources when critical management plans remain unfinished.

Predator management is important to maintain healthy populations of wildlife. It is also critical to manage populations in urban areas where over population leads to public safety incidents involving domestic livestock, pets, and children.

SCI believes that sound science-based conservation involving hunting as the primary management tool, while maximizing opportunities for all huntable species, including predators such as coyotes, is necessary to the long-term health of wildlife. Hunters have long paid the way for conservation, both game and non-game wildlife, and maximizing opportunity for hunting is also key to long-term funding for all conservation. Hunting benefits wildlife conservation.

Thank you for the opportunity to comment on the proposed change to Fish and Game Code Section 472. Please reject any change and keep the Department's limited resources focused on critical issues where the science supports additional management efforts.

SCI is dedicated to protecting the freedom to hunt and is always First For Hunters.

Sincerely,

Katherine Kelly

[REDACTED]
[REDACTED]
[REDACTED]

From: Kevin Kramer [REDACTED]
Sent: Thursday, May 1, 2025 9:53 PM
To: FGC <FGC@fgc.ca.gov>
Subject: Coyote Take

You don't often get email from [REDACTED]. [Learn why this is important](#)

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Dear Committee Chair,

I am writing this email to formally express my opposition to any changes in regulations regarding the hunting of coyotes. My opposition is based on the following observations and facts:

- 1) Coyote populations are not currently threatened. The proposed changes are not driven by science.
- 2) Existing regulations seem to be adequate and have not led to a threatened coyote population.
- 3) Coyotes contribute to dwindling populations of deer and antelope, whose numbers have notably decreased over the past 20 years.
- 4) Coyotes also account for many livestock deaths each year. Unchecked these deaths will most likely increase. Just this last calving season we lost 3 calves to coyotes on our ranch. I can't imagine what would happen if we were not allowed to protect our livestock and if the coyote population was allowed to grow through further regulations.
- 5) The Department would not be able to effectively issue depredation permits to everyone that would undoubtedly be requesting these and it would cost more money to enforce this unfounded change to current regulations.

I urge you to make **no** changes to current regulations regarding coyote hunting. More regulations will lead to higher populations of coyotes, which will exacerbate the pressure on dwindling deer and antelope populations. Increases in livestock kills will likely result as

well and the regulations will be more costly to the taxpayers of this State. Thank you for your time and consideration on this matter.

Sincerely.

Kevin Kramer

[REDACTED]

[REDACTED]

From: [REDACTED]

Sent: Wednesday, April 30, 2025 10:12 PM

To: FGC <FGC@fgc.ca.gov>

Subject: Opposition To Coyote Kill Rules

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To Whom It May Concern:

Re: Letter in Opposition to Alteration of Coyote Kill Authorization

I have been a beef producer for 45 years. For the last 15 years my herd numbers have been reduced to below 100 cows closer to the national average of 20 cows but less than 50 cows. During that time I have rented two pastures in Glenn and Colusa counties. One is 20 miles from home and the other about 12 miles from home in the opposite direction. My small operation allows me to supplement my social security in retirement now but without the funds to hire full or part time cowboys to safeguard my cows. My wife and I try to see our cows and calves, when they have calves, every day to supervise them and meet their needs, but that is not always possible. The loss of a calf or two in a year to coyotes for a producer as small as I am, is devastating.

My opportunity to protect my animals is as I check on them, usually in the daytime, but often at night too. When I find a coyote or coyotes chasing or stalking a calf it is my only opportunity to kill them. If limitations on when or how many coyotes I can kill to protect my cows and calves took place, my risk of loss would be substantially increased.

Having known a pilot licensed to hunt them from aircraft, I have personally, in the past, been able to hunt, shoot and kill them from aircraft. Hunting them on the ground is quite difficult because they are wary. On the other hand, they are not too afraid of humans as they have come into my yard at home trying to get chickens and other birds I have there.

Because my dogs outnumber them the coyotes at home have been unsuccessful. To be successful you have to be there when they are which makes allowing a kill at any time and in any numbers critically important for me. Visiting with other small producers who are my neighbors and friends allows me to say other small producers experience the same difficulty in protecting their small herds that I have and the devastation that could result if current authority to kill coyotes changed or imposed limitations on killing them.

I respectfully request that you not change the current rules/laws that allow a kill any time in any number.

Thank you.

Bob Maloney [REDACTED]

From: Carrie Anne P [REDACTED]

Sent: Monday, April 28, 2025 04:53 PM

To: FGC <FGC@fgc.ca.gov>

Subject: Take of Coyotes Agenda

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Improved regulations need to be implemented in regard to coyotes and public safety. The coyote population is growing to where it's out of control. Coyotes are roaming residential areas, now even in the beach cities of SoCal. It's not at all uncommon to see coyotes roaming on our properties at night. They come right up to the door on occasions. They walk up the driveways and try to attack cats hiding under the cars. Coyote sightings are shared almost daily in our community and in surrounding cities with Ring camera apps showing the coyote population steadily increasing. My daughter was confronted by a coyote late at night when coming home from work. My teenager had howling coyotes run past her on the street when she was returning from a night course at college. A neighbor's cat was mangled by 3 coyotes. We also hear coyotes howling at night in the park nearby. Waiting until a child, adult, or elderly person is hurt is too late to implement change and to take appropriate action. Proactive measures are needed now before anyone potentially gets hurt.