

## Staff Summary for August 13-14, 2025

**14A. Wildlife Resources Committee (WRC)****Today's Item**Information ☐Action ☒

Discuss referred topics and consider revisions to topics and timing. Consider approving draft agenda topics for the next committee meeting to be held September 11, 2025.

**Summary of Previous/Future Actions**

- |   |                           |
|---|---------------------------|
| • Previous committee meeting                    | May 15, 2025; WRC         |
| • <b>Today consider approving agenda topics</b> | <b>August 13-14, 2025</b> |
| • Next committee meeting                        | September 11, 2025; WRC   |

**Background**

WRC works under Commission direction to set and accomplish its work plan.

**Committee Work Plan**

Topics that have been referred by the Commission to WRC are displayed within a work plan for scheduling and tracking. The updated work plan in Exhibit 1 includes proposed topics for September 2025, including one potential new topic summarized below.

*New Topics*

The Department proposes that the regulatory topic "*Rattlesnake Exhibition*" be referred to WRC for initial vetting and discussion in September and discussion with a potential recommendation in January 2026 (Exhibit 2). The Department plans to propose regulatory amendments to allow for commercial display and/or use of rattlesnakes in areas such as the film industry and snake aversion training for dogs. The topic has been added to the draft work plan in blue text to represent that it is new/proposed.

**Next Committee Meeting**

The next committee meeting is scheduled for September 11, 2025 in Sacramento, with a webinar option for the public. In addition to standing agenda items (Department updates and future agenda items), seven topics are proposed:

- *Annual Rulemakings*. Discussion and potential recommendations for (1) waterfowl hunting, (2) Central Valley sport fishing, and (3) Klamath River Basin sport fishing.
- *Periodic Rulemakings*. Discussion and potential recommendations for (1) upland (resident) game birds, (2) big game hunting, and (3) Department lands.
- *Rattlesnake Exhibition*. Initial vetting and discussion.

**Significant Public Comments**

A commenter states that it is a responsibility of the Commission to manage wildlife as a public trust resource, with an obligation to rely on the best available science rather than to serve special interests or ideologies. The individual disputes that coyotes are an important ecosystem component (including their role in regulating rodent populations and protecting songbird

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diversity), believes that compensatory mechanisms are not well-founded (including in relation to reproduction, social disruption and mortality), and states that coordinated, targeted and sustained management can be effective in suppressing localized coyote populations. He urges the Commission to shape policy based on science, comprehensive data, and evidence (Exhibit 2).

**Recommendation**

**Commission staff:** Approve the draft agenda topics for the May 15 WRC meeting, and approve the work plan as proposed in Exhibit 1, including any changes identified during today's meeting.

**Exhibits**

1. [Draft work plan, updated August 4, 2025](#)
2. [Email from Ona Alminas, Regulations Unit Manager, California Department of Fish and Wildlife, received August 5, 2025](#)
3. [Email and letter from Steven Childs, received May 15, 2025](#)

**Motion**

Moved by \_\_\_\_\_ and seconded by \_\_\_\_\_ that the Commission approves the topics for the September 11, 2025 Wildlife Resources Committee meeting, as discussed today, and approves the work plan as proposed.

**California Fish and Game Commission**  
**Wildlife Resources Committee (WRC) Work Plan**  
**Scheduled Topics and Timeline for Items Referred to WRC**  
*Updated August 5, 2025*

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

Topics	Category	May 2025	Sep 2025	Jan 2026
Periodic and Annual Regulations				
Upland (Resident) Game Bird Hunting	Regulatory	X	X/R	
Big Game Hunting (deer, elk, pronghorn antelope, black bear, Nelson bighorn sheep)	Regulatory	X	X/R	
Waterfowl Hunting	Annual Regulatory	X	X/R	
Central Valley Sport Fishing	Annual Regulatory	X	X/R	
Klamath River Basin Sport Fishing	Annual Regulatory	X	X/R	
Inland Sport Fishing (including striped bass)	Regulatory		X	<u>X/R</u>
Department Lands	Regulatory	X	X/R	
Regulations & Legislative Mandates				
Restricted Species	Regulatory			
Take of Coyotes	Referral for Review	X		
Bear Hunting	<u>Referral for Review Regulatory</u>	X	X/R	
<u>Rattlesnake Exhibition</u>	<u>Regulatory</u>		<u>X</u>	<u>X/R</u>

**KEY: X = Vetting/Discussion    X/R = Discussion/Potential Recommendation to Commission**

**From:** Wildlife Regulations  
**Sent:** Tuesday, August 5, 2025 12:56 PM  
**To:** Melissa Miller-Henson  
**Cc:** David Thesell, Dixie Van Allen, David Haug, Ari Cornman, Chad Dibble  
**Subject:** Proposed regulatory concepts for Committee consideration

Good afternoon Melissa,

The Department of Fish and Wildlife (Department) requests the following regulatory proposals for amendments to Title 14, California Code of Regulations (CCR) to be added to the agenda for the September 11, 2025 Wildlife Resources Committee meeting for discussion and vetting, and for consideration towards a potential action at the January 13, 2026 Wildlife Resources Committee meeting.

1. Inland Sport Fishing 2026
  - a. This proposal includes various updates throughout inland sport fishing regulations, including regulatory language clean-up, changes to increase opportunities, gear related changes, updates for protection of certain species at certain times of year, biological sampling requirements, and updates for the steelhead report card.
2. Rattlesnake Exhibition
  - a. This proposal aims to provide a framework to permit the possession and propagation of California native rattlesnakes for commercial exhibition.

If you have any questions or need additional information, please contact me at [Regulations@wildlife.ca.gov](mailto:Regulations@wildlife.ca.gov) or 916-xxx-xxxx.

Thank you,  
Ona Alminas



Ona Alminas, M.S. (she/her)  
Regulations Unit Manager  
715 P Street, 17<sup>th</sup> Floor  
Sacramento, CA 95814

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**From:** Steven Childs [REDACTED]  
**Sent:** Thursday, May 15, 2025 10:17 AM  
**To:** FGC <[FGC@fgc.ca.gov](mailto:FGC@fgc.ca.gov)>  
**Subject:** WRC Item 4 COYOTES

I wanted to have my letter included for the commissioners to read.

Thank you.

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Steven Childs

[REDACTED]  
[REDACTED]

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

To Commissioners:  
Erika Zavaleta, President.  
Samantha Murray, Vice President.  
Jacque Hostler-Carmesin, Member.  
Eric Sklar, Member.  
Darius Anderson, Member.

## **The Role of the Commission in Science-Based Wildlife Management**

The responsibility of this Commission is to manage wildlife as a resource held in the public trust—not to serve special interests or ideologies. That responsibility includes a legal and ethical obligation to rely on the best available science, not selectively curated studies or emotionally charged narratives. Wildlife management must be holistic and grounded in ecological principles, with the goal of maintaining ecosystem processes and ensuring long-term sustainability for all species—not just the ones that attract the most public sympathy or media attention.

Unfortunately, the line between conservation and advocacy has become increasingly blurred. A clear example is Earth Island Institute. On one hand, the organization provides meaningful support for fisheries restoration, contributing resources and labor that improve conservation outcomes. On the other hand, it serves as the fiscal sponsor of Project Coyote—an ideologically driven group that routinely promotes selective science and campaigns rooted in emotion rather than balanced ecological understanding. This dual role is problematic, as it can make it difficult for the public—and even decision-makers—to distinguish between legitimate conservation efforts and activism. The credibility of science-based management is at risk when advocacy masquerades as objectivity.

This Commission has a duty to rise above advocacy pressure and apply science impartially. Yet history suggests room for improvement. Former Commissioner Sutton, for example, announced his intent to ban predator hunting contests during a Project Coyote gala—before the public had any opportunity to weigh in. More recently, Wildlife Advisor Ari Cornman invited Project Coyote science advisor Adrian Treves to present on urban coyotes, failing to disclose his personal relationship with him to the public. And Executive Director Melissa Miller-Hansen has publicly injected her personal opinions into Commission discussions, a role that should remain neutral and administrative. These actions, whether intentional or not, compromise the public's trust in the fairness and objectivity of both the Commission and the Wildlife Resources Committee.

If the Commission is to maintain its credibility, it must recommit to the principles of transparency, scientific integrity, and public trust. Decisions must reflect the totality of ecological data, not advocacy talking points. Only then can the public be assured that wildlife policy is being shaped by evidence—not ideology.

## **Rebuttal to Claims About Coyotes and Their Ecological Role**

Animal advocates often portray coyotes as keystone species that are essential for healthy ecosystems, but these claims merit closer scrutiny. Below is a critical response to several common arguments put forth in defense of coyotes, focusing on ecological data, scientific critique, and the broader context of wildlife management.

### **"Coyotes are essential to the ecosystems in which they live."**

If coyotes were indeed essential to ecosystem function, one must ask how these same ecosystems functioned before coyotes expanded into them. Historically, coyotes were limited to the Great Plains and southwestern deserts of North America. Since European settlement, they have significantly expanded their range into the eastern U.S., Canada, Alaska, and as far south as Panama and even Colombia. These ecosystems, which evolved in the absence of coyotes, were stable and functioning prior to their arrival. The claim of ecological necessity becomes difficult to support when many ecosystems thrived without their presence.

### **"Coyotes help regulate rodent populations."**

While coyotes do prey on rodents, they are far from the only species that do so. Raptors, foxes, weasels, bobcats, snakes, and even domestic cats play significant roles in rodent control. Coyotes may contribute to regulation, but they are not irreplaceable. In many systems, their impact is diffuse and not clearly distinguishable from other predator influences.

### **"Coyotes support songbird diversity (Crooks and Soulé, 1999)."**

This commonly cited study argues that coyotes suppress mesopredators (like raccoons and foxes), thereby indirectly protecting songbirds. However, the study has received significant criticism for relying on observational rather than experimental data, and it has not been robustly replicated. Furthermore, it emphasizes top-down control while largely ignoring bottom-up ecological drivers such as habitat quality, prey abundance, and resource distribution. This weakens the claim of a clear causal relationship between coyote presence and songbird diversity.

## **Compensatory Reproduction Theory**

The idea that coyote removal leads to increased breeding—because subordinate or previously non-breeding individuals step into newly vacated roles—is still a theory and not universally accepted. While some evidence supports the notion of increased litter size under persecution, this response is better understood as a *compensatory* mechanism, not a signal of unchecked growth. Reproductive activity is complex and tied more to food availability than to persecution alone.

Indeed, studies like (Feldhamer et al. 1981, Gese 2005) show that reproduction varies primarily with resource abundance. In years of high food availability, more females (including yearlings)

reproduce. In contrast, during lean years, breeding rates naturally drop. This suggests that environmental conditions, not persecution, are the stronger driver of reproduction.

### **Disruption of Packs and Social Structure**

Contrary to popular belief, coyote pack disruption does not necessarily lead to chaos or a surge in reproduction. Crabtree and Gese's study on foraging ecology showed that when coyotes were removed (e.g., via vehicle strikes), others simply took their place. (Crabtree and Gese 1996). This replacement behavior underscores the fluidity and adaptability of coyote social structure.

In fact, (Ward et al. 2018) demonstrated that coyotes frequently shift between resident and transient roles. About 27% of collared coyotes switched between the two states. This behavioral plasticity undermines the argument that social disruption from lethal control will automatically lead to a population boom.

### **Natural Mortality and Litter Size**

Coyote populations are not exempt from natural limiting factors such as disease, starvation, interspecific conflict, and territorial disputes. Litter size, like reproduction, is primarily influenced by food availability, not persecution. Therefore, any increase in reproduction following control is often balanced by higher mortality—meaning the net effect on population is minimal or temporary.

### **Control Strategies and Misconceptions**

It's important to distinguish between sporadic, uncoordinated removal and targeted, sustained management in problem areas. While haphazard control may result in temporary fluctuations or behavioral changes, coordinated efforts—especially in areas experiencing depredation or conflict—can be effective in suppressing localized populations without leading to explosive rebound.

### **Final Thoughts**

The notion that coyote populations spiral out of control in response to persecution lacks robust scientific backing. While control efforts can influence behavior and social dynamics, there is no credible evidence that such actions cause uncontrolled population growth. Key drivers of coyote abundance remain food availability, habitat, and social interactions—not human persecution alone. If this were true, ask why coyote population densities are much higher in urban environments where coyotes are not hunted.

Animal advocacy groups often rely on selective interpretations of science to support their positions. By elevating emotional arguments and cherry-picked studies over balanced ecological analysis, they risk distorting public understanding and undermining science-based wildlife management. Effective conservation and population control should be grounded in comprehensive data, not ideology.



Respectfully,

Steven Childs

## Literature Cited

- Crabtree, R. L., and E. M. Gese. 1996. Foraging ecology of coyotes (*Canis latrans*): the influence of extrinsic factors and a dominance hierarchy. *Canadian Journal of Zoology*, 74(5), 769-783.
- Crooks, K. R., and M. E. Soulé. 1999. Mesopredator release and avifaunal extinctions in a fragmented system. *Nature* 400:563–566.
- Feldhamer, G. A., B. C. Thompson, and J. A. Chapman, editors. 1981. *Wild mammals of North America: biology, management, and economics*. Johns Hopkins University Press, Baltimore, Maryland, USA.
- Gese, Eric. 2005. Demographic and Spatial Responses of Coyotes to Changes in Food and Exploitation. *Proceedings of the 11th Wildlife Damage Management Conference*.
- Ward, J.N., J.W. Hinton, K.L. Johannsen, M.L. Karlin, K.V. Miller, and M.J. Chamberlain. 2018. Home range size, vegetation density, and season influence prey use by coyotes (*Canis latrans*). *Journal of Wildlife Management* 82(8):1633–1644.