

Staff Summary for October 13-16, 2026

6. Mammal Trapping Consistency with Statute**Today's Item****Information** ☒**Action** ☐

Discuss proposed amendments to regulations related to mammal trapping to align regulations with California Fish and Game Code, and to clarify existing mammal trapping provisions.

Summary of Previous/Future Actions

- | | |
|--|----------------------------|
| • Wildlife Resources Committee (WRC) vetting | January 13, 2026; WRC |
| • WRC vetting | May 14, 2026; WRC |
| • Notice hearing | August 12-13, 2026 |
| • Today's discussion hearing | October 13-16, 2026 |
| • Adoption hearing | December 15-16, 2026 |

Background

California State Assembly bills passed in the 2019–20 session added significant new restrictions on trapping and the fur trade. In response, the Department is proposing updates to mammal trapping regulations to align them with current Fish and Game Code requirements, revise license renewal procedures when annual reports are not submitted, and make minor adjustments to improve clarity and consistency.

Updates Since Previous Meeting

A notice of proposed changes in regulations was published in the California Regulatory Notice Register on September 11, 2026. There have been no changes proposed to the regulatory language since the notice was published.

Today's meeting provides an opportunity for public discussion of the proposed regulatory amendments. Further details on the proposed changes are available in the initial statement of reasons and the proposed regulatory language (exhibits 2 and 3).

Significant Public Comments

Wildlife Care of Southern California supports the proposed rules requiring incidentally trapped injured bobcats to be transferred to rehabilitators but emphasized that no legal process exists for capturing injured wildlife still mobile in the field. They explain that rehabilitators often encounter severely injured coyotes and bobcats needing humane trapping, yet current regulations prohibit them from performing these rescues. They cite "Wendy," the Studio City coyote case, as an example of suffering caused by this regulatory gap, and note that current law only permits transport of animals already lawfully trapped. The organization requests authorization for trained rehabilitators to use humane live-capture equipment when necessary for treatment and timely intervention. They ask the Commission and the Department to create a case-by-case authorization process or permit amendment to allow qualified rehabilitators to humanely trap injured mammals solely for rehabilitation. (Exhibit 6)

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Recommendation (N/A)

Exhibits

1. [Staff summary from August 12-13, 2026](#) (*for background purposes only*)
2. [Initial statement of reasons](#)
3. [Proposed regulatory language](#)
4. [Department transmittal memo for draft negative declaration](#), received September 16, 2026
5. [Draft negative declaration](#), dated July 2026
6. [Letters from Anna Reams, Director, Wildlife Care of Southern California](#), received September 13, 2026 and September 19, 2026

Motion (N/A)

Staff Summary for August 12-13, 2026
(*For background purposes only*)

17. Mammal Trapping Consistency with Statute

Today's Item

Information ☐

Action ☒

Consider authorizing publication of notice of intent to amend regulations related to trapping to align regulations with California Fish and Game Code, and to clarify and expand several existing trapping provisions.

Summary of Previous/Future Actions

- | | |
|--|---------------------------|
| • Wildlife Resources Committee (WRC) vetting | January 13, 2026; WRC |
| • WRC vetting | May 14, 2026; WRC |
| • Today's notice hearing | August 12-13, 2026 |
| • Discussion hearing | October 14-15, 2026 |
| • Adoption hearing | December 16-17, 2026 |

Background

Several California State Assembly bills in the 2019-20 session, which became law, significantly increased restrictions on trapping and fur trade. Assembly Bill (AB) 273 banned trapping of any furbearing or nongame mammal for recreation or fur commerce and prohibited selling raw fur, and eliminated state-issued fur dealer and fur agent licenses. AB 1254 made hunting, trapping, or otherwise taking bobcats unlawful except under narrowly defined circumstances and directed funding for a comprehensive bobcat management plan. AB 44 made it illegal to sell, trade, distribute or manufacture most fur products in California, while exempting certain used or exempted items, and imposed recordkeeping requirements for exempt transactions. These statutory provisions invalidated multiple existing trapping and depredation regulations.

As a result of these statutory changes, the Department has provided proposed amendments to mammal trapping regulations (exhibits 1 through 3) designed to provide consistency with current California Fish and Game Code provisions, update the license renewal process when annual reports are not submitted, and make minor conforming amendments to improve the clarity and consistency of the regulations.

Draft Proposed Regulations

The proposed amendments modernize and streamline all sections by removing obsolete trapping provisions, updating terminology, and aligning regulations with current law and depredation-only authority. Key changes by section include:

- Section 251.5: Eliminates obsolete mountain lion permit provisions and updates terminology to reflect current law and the ban on recreational trapping
- Section 465.5: Removes all outdated references to body-gripping traps and recreational and commercial trapping, aligning the section with current depredation-only trapping rules
- Section 467: Reorganizes the section by separating reporting requirements from penalties and removes outdated suspension procedures.
- Section 474: Clarifies written permission requirements for entering private property.

Staff Summary for August 12-13, 2026
(For background purposes only)

- Section 478: Clarifies that bobcats may only be taken under depredation permits and prohibits the sale or export of bobcats.
- Section 479: Updates possession, import, and documentation requirements for bobcat pelts and other fur products.
- Section 696: Repeals this section in its entirety because fur dealer and fur agent licenses are obsolete under current law.

Complete details are available in the draft initial statement of reasons and proposed regulatory language (exhibits 2 and 3).

Today, the Department will present an overview of the draft proposed amendments (Exhibit 5).

Significant Public Comments (N/A)

Recommendation

Commission staff: Authorize publication of intent to amend sections 251.5, 465.5, 467, 474, 478 and 479, and repeal Section 696 as recommended by the Department.

Committee: Schedule a rulemaking regarding mammal trapping based on the Department's recommendation.

Department: Authorize publication of notice of intent to amend sections 251.5, 465.5, 467, 474, 478 and 479, and repeal Section 696.

Exhibits

1. [Department memo transmitting the draft initial statement of reasons](#), received July 27, 2026
2. [Draft initial statement of reasons](#)
3. [Proposed regulatory language](#)
4. [Draft economic and fiscal impact statement \(STD.399\) and addendum](#)
5. [Department presentation](#)

Motion

Moved by _____ and seconded by _____ that the Commission authorizes publication of a notice of its intent to amend sections 251.5, 465.5, 467, 474, 478 and 479, and repeal Section 696 related to trapping consistency with statute as discussed today.

State of California
Fish and Game Commission

Initial Statement of Reasons for Regulatory Action

Amend Sections 251.5, 465.5, 467, 474, 478 and 479

Repeal Section 696

Title 14, California Code of Regulations

Re: Mammal Trapping Consistency with Statute

I. Date of Initial Statement of Reasons: July 3, 2026

II. Dates and Locations of Scheduled Hearings

(a) Notice Hearing

Date: August 12-13, 2026

Location: Sacramento

(b) Discussion Hearing

Date: October 13-16, 2026

Location: Sacramento

(c) Adoption Hearing

Date: December 16-17, 2026

Location: Sacramento

III. Description of Regulatory Action

(a) Statement of Specific Purpose of Regulatory Change and Factual Basis for Determining that Regulation Change is Reasonably Necessary

Unless otherwise specified, all section references in this document are to Title 14 of the California Code of Regulations (CCR).

The proposed regulations are necessary to maintain consistency with new statute in Fish and Game Code Section 4001 (Assembly Bill 273, 2019-20 legislative session) which made it unlawful to trap any furbearing mammal or nongame mammal for purposes of recreation or commerce in fur, and prohibits the sale of the raw fur of any fur-bearing mammal or nongame mammal otherwise lawfully taken. The bill eliminated the Licensed Fur Dealer and Licensed Fur Agent licenses that the California Department of Fish and Wildlife (Department) previously sold. Current regulations in sections 251.5, 465.5, 467, 474 and 696 are also out of date with respect to these requirements.

Fish and Game Code sections 4157 and 4158 (Assembly Bill 1254, 2019-20 legislative session) made it unlawful to hunt, trap, or otherwise take a bobcat, except under specified circumstances, including under a depredation permit. The bill's specified appropriation has been made by the Legislature to the Department to develop a bobcat management plan to inform and coordinate management decisions regarding bobcat populations. Current regulations in Section 478 are out of date with respect to current requirements for depredation of bobcats.

Fish and Game Code Section 2023 (Assembly Bill 44, 2019-20) became fully operative on January 1, 2023, and made it unlawful to sell, offer for sale, display for sale, trade, or otherwise distribute for monetary or nonmonetary consideration a fur product, as defined, in the state. The statute also made it unlawful to manufacture a fur product in the state for sale. The statute exempted used fur products, as defined, fur products used for specified purposes, and any activity expressly authorized by federal law. The statute requires a person that sells or trades any fur product exempt from this prohibition to maintain records of each sale or trade of an exempt fur product for at least one year, except as provided. Current regulations in 479 are out of date with respect to these requirements.

Proposed Regulations

The amendments to the trapping regulations described below are designed to provide consistency and conformity to current statutes, and to make minor conforming changes to increase the clarity and consistency of these regulations.

Section 251.5 Possession of Game Birds, Game Mammals, Exotic Game Mammals, Furbearers, Nongame Birds and Nongame Animals Mammals.

The title of this Section is amended for clarity and to reflect the content of the provisions.

Subsection (a) - no changes to regulatory language.

Subsection (b) is removed from Section 251.5. Subsection (b) references that a live mountain lion may be possessed only under the terms of a permit issued by the Department on or before June 6, 1990. This date is now more than 35 years in the past and there are no such permits for living mountain lions in existence in California. Because the mountain lion is a specially protected animal in California, no new permits of this type may be issued for this species. The regulatory language of this subsection does not otherwise have any effect on the statutory provisions 2150 or 3200 for other licenses or permits that the department issues. For these reasons, subsection (b) is no longer needed and should be removed for clarity, and consistency with current law and regulations.

Subsection (b), renumbered from (c), is amended, replacing ~~nongame animal~~ with nongame bird, or nongame mammal; (nongame animal is not a term that is defined in Statute or regulation) removes the references to a trapping license because Section 251.5 relates to the recreational take of the specified groups of animals and recreational trapping is no longer lawful in California per Fish and Game Code 4001. The phrase ~~and reduced to possession by the hunter, or trapper~~ is deleted since this reference is to the hunting license that is already in the sentence.

Section 465.5. Use of Traps.

Subsection (a) The description of “body gripping trap” is deleted as it repeats the definition. All other references to this description or ‘body gripping’ are deleted throughout the regulation as unlawful for purposes other than those described in subsection (g) including protection of property.

Subsection (b) - no changes to regulatory language.

Subsection (c) Prohibition on Trapping for the Purposes of Recreation or Commerce, is amended to remove the language concerning specific types of traps since trapping by any method for recreation or commercial fur use is unlawful.

Subsection (d) is amended to remove reference to “body gripping traps” since trapping by any means for recreation or commerce in fur is unlawful.

Subsection (e) no changes to regulatory language.

Subsection (f) Use of Non-Body Gripping Traps, the current subsection is deleted in its entirety. Trapping by any means for purposes of recreation and commerce in fur is unlawful.

Subsection (f) Trap Number Requirement (renumbered from (f)(1)). The department assigns a trap number upon receipt of the Depredating Trap Numbering form (no fee), available on the department’s website wildlife.ca.gov, to aid the public in acquiring a registered Trap Number. Once a Trap Number is registered it is permanently assigned to the person.

Subsection (g), the last sentence of this provision has been removed because trapping for purposes of recreation and commerce in fur and the exchange of raw fur is unlawful.

Subsection (g)(1) no changes to regulatory language .

Subsection (g)(2) Trap Visitation Requirement, Fish and Game Code Section 4152 specifies that it is “the owner or tenant of the premises” that gives written permission to a representative. The provision is updated to provide greater consistency in these regulations.

Subsection (g)(2)(A) specifies that a representative must have the authorization on their person to visit and check traps that have been set. This requirement allows law enforcement to determine upon contacting an individual, whether they are authorized to trap at that location through written permission or a contract for professional trapping service(s).

Subsection (g)(2)(B) clarifying that the representative, when unable, may authorize another person to perform the required checks.

Subsections (g)(3) through (h) no changes to regulatory language.

Section 467. Annual Statement of Licensee, Trapping Report.

The title of this Section is changed (and throughout the section) to conform with Fish and Game Code Section 4008, which designates this requirement as “Annual Statement of Licensee.” Trapping Report is the more common term and is used interchangeably.

The content of the first paragraph has been deleted but the applicable content is divided and amended into new subsections (a) and (b) to differentiate the required elements of a completed annual trapping report from the penalty for failing to submit a trapping report on time. The last sentence setting forth a method of notice of suspension, revocation, and renewal of license is deleted. The previous method placed a heavy burden on Commission

Staff and the affected Licensee's without a need to involve another agency in the reinstatement decision since the Legislature allows that furbearing mammals, nongame mammals and nongame birds that are not covered by the Migratory Bird Treaty Act, may be taken by a landowner or their designee when found to be injuring growing crops or other property. The department is able to determine when a report has been received from a Trapping Licensee that satisfies the Statutory requirement.

Subsection (a) Annual Statement of Licensee. The required Annual Statement of Licensee "shall" be submitted to the Department by all license holders by July 1 following their previous license year's take in. This conforms with the statutory requirement in Section 4008, Fish and Game Code, to allow the Department to monitor and understand the magnitude, distribution and outcomes, of the take of wildlife authorized under this license. This change was requested by members of the public during public comment at initial vetting for this rulemaking at the Fish and Game Commission's Wildlife Resources Committee on January 13th, 2026. A form "Annual Statement of Licensee," not incorporated by reference, is provided by the Department to download and print from the Department's license directory. The statement shall include:

Subsection (a)(1) the species of animals, the location, whether the animal was killed or released and date taken in conformance with the statutory requirement.

Subsection (a)(2) Those licensees who have not taken any of the listed fur-bearing or non-game mammals are required to submit a report of zero take in conformance with the statutory requirement.

Subsection (a)(3) Where permitted trapping activities occur it is possible that incidental take of game species or nongame birds or mammals (other than the 'target', e.g., rat) may occur. Licensees are to take actions such as the immediate release or transport to a rehabilitation facility to minimize this problem. If incidental take occurs, the Annual Statement of Licensee shall report that take. This information is necessary to provide a complete picture of the efforts of the licensee and the animals.

Subsection (a)(3)(A) When uninjured the animal shall be released. Keeping or injuring an unauthorized animal is unlawful. This is both humane and necessary to prevent any financial motive for take of the animal.

Subsection (a)(3)(B) When an animal that is orphaned or injured is in the possession of the licensee; it shall be brought to the nearest wildlife rehabilitator. This is both humane and necessary to prevent any financial motive for take of the animal.

Subsection (a)(3)(C), if an animal is killed as a result of an incidental take the animal shall be disposed of in accordance to all federal, state, and local jurisdiction requirements and no part shall be harvested or kept by the trapper. This is both humane and necessary to prevent any financial motive for take of the animal.

Subsection (a)(4) The provision specifies that in the event a State or Federal protected species is incidentally taken, it shall be reported to both the Department and U.S. Fish and Wildlife Service. This is necessary to make explicit the responsibility of the licensee for such protected species for this particular trapping license. This explicit reporting

obligation supports coordinated species protection efforts and ensures compliance with applicable State and Federal laws.

Subsection (b) Late or incomplete statements will result in license suspension until the report is received by the Department's License and Revenue Branch. This is necessary to underscore the importance of submitting an accurate report on time, as timely reporting is essential for effective oversight and resource management. Information is given for the licensee to determine the status of their report by going online. Providing online access for licensees to verify the status of their report ensures transparency and gives licensees a clear, accessible method to confirm compliance and avoid unnecessary suspension.

Subsection (c) Acknowledgement and Signature. The reporting licensee must sign the form accordingly with knowledge of the threat of prosecution, resulting in fines or jail if the Department finds information has been falsified by the applicant. This provision is necessary for the Department to ensure that an applicant provides accurate information as required per Fish and Game Code Section 4008. Language is added pursuant to compliance with California Civil Code subdivision b of Section 1633.5 for provision of electronic signature.

Section 474. Hours for Taking of Nongame Mammals.

The title of this section is amended adding the "of Nongame Mammals" for clarity because this section references only nongame mammals.

Subsection (a) The first unnumbered provision is numbered as subsection (a) for clarity. The relevant portion of the last sentence of the former (a) has been moved here to clarify that legal traps are allowed, but not for hunting.

Subsection (b), renumbered from subsection (a). There are no changes to the boundary description in (b). The last sentence has been deleted and the relevant portion moved to (a) for clarity.

As specified in (a) "legal take" refers to the regulations and statutes and there is no need for specific section references and are deleted (The Note regarding Authority and Reference has been updated to include relevant sections). Current language referring to the "regulation supersedes Fish and Game Code Section 3000" is deleted since the proposed language does not change or supersede the Fish and Game Code.

Subsection (c), renumbered from subsection (b), and added subsections (c)(1) and (2) for organizational clarity.

Subsection (c)(1) In the language "his agents", is replaced with "their tenant" in order to provide consistency with the language in 465.5.

Subsection (c)(2) In the language "his agents", is replaced with "their tenant" in order to provide consistency with the language in 465.5. The description of the written permission that is required to be in possession for a person taking nongame mammals on private property and is updated to state "to enter the property", instead of "trespass" clarifying the intent which the landowner or tenant has already granted permission to

access a property. The hours of entry are deleted since the provision is only applicable to the hours stated in (c).

Subsection (d), renumbered from subsection (c).

Section 478

In subsection (a), the first sentence is updated to add the words “hunt, trap”, preceding the word “pursue”, to make it clear that no hunting or trapping or pursuit of a bobcat may occur unless the specified conditions are met. The remainder of this subsection (a) is updated to add the language “or depredation permit as in subsection (b) below” and “issued pursuant to Section 401 of these regulations as in subsection (b) below.” These additions are necessary to include, because they represent the specific condition that must be satisfied before a bobcat may be lawfully trapped resulting from new law contained in AB1254 that amended Fish and Game Code Section 4181 to require a depredation permit for the trapping of bobcats.

Subsection (c) is amended to indicate that the only exception that allows for the trapping of a bobcat is under the authority of a depredation permit issued pursuant to Section 401. This subsection is further amended to state that a bobcat taken pursuant to a depredation permit shall be disposed of as required in the permit. This language is necessary to make clear that it is unlawful to sell or export any bobcat or part of any bobcat taken in the State of California.

This subsection is further amended to replace “holder of a trapping license” with “person” since the conditions of a depredation permit may provide a person with the authority to trap a bobcat, and a trapping license is not a required condition of a depredation permit issued by the department. People who do not possess a trapping license may still obtain a depredation permit for bobcat.

Finally, the stipulation is added to the end of subsection “that is not the depredating species identified in a depredation permit issued by the department” to indicate that if a bobcat is trapped when not the subject of a depredation permit, it shall be immediately released unharmed back to the wild. This addition is needed to maintain consistency with the provisions of Section 401 which allows the issuance of a depredation permit to take a bobcat that is damaging or destroying or immediately threatening to damage or destroy land or property.

Section 479

In subsection (a) in the first sentence, the addition of the words “lawfully” and “prior to January 1, 2020” makes clear, the time period from which a bobcat must have been taken for the bobcat’s pelt to have been lawfully harvested. The addition of the word “completed” further specifies for clarity, that a tag affixed to a bobcat pelt must also be completely filled out for the pelt to be lawfully possessed. Following the language in the second sentence that states “as set forth in Section 478.1,” the words “affixed to the pelt,” are added as this language is consistent with the guidance provided in section 478.1. This addition is necessary to reference the conditions which must be satisfied, before the Commission may

open a bobcat hunting season in any area, determined by the Commission to require a hunt

In subsection (b)(1) the referenced “shipping tag” is further described/identified as the “United States Fish and Wildlife Service Convention on International Trade in Endangered Species (CITES) export or shipping tag” for clarity. The word “and” is added following “Marked with the current export or shipping tag from the state of origin” to make clear that all of the conditions in (b)(1) through (b)(3) must collectively be satisfied in order a bobcat pelt to be lawfully received from out of state.

In subsection (b)(2), reference to the import declaration described in Fish and Game Code Section 2353, is replaced by reference to a Declaration of Importation of Dead Wildlife form DFW901 as provided in Section 712.5. Section 712.5 was added in 2022 and is more specific than Fish and Game Code Section 2353 regarding the declaration that is required to be submitted to the department. Section 712.5 incorporates by reference, the specific form DFW901 which is required to be completed for importation of dead wildlife.

In the first sentence of subsection (b)(2) the words “in the shipment” are stricken because the referenced form DFW 901 does not apply to dead birds, mammals, fish, reptiles, or amphibians imported into this state in a shipment handled by a common carrier under a bill of lading. This language “in the shipment” formerly referenced the USFWS CITES tagging requirement which is now separated under subsection (b)(1) for organizational clarity.

The last sentence of subsection (b)(2) which states “Demonstration of the declaration of entry, pelt ownership and proof of legal take and marking is required of anyone receiving bobcat pelts from out-of-state upon the request of the department.”, is replaced by new subsection (b)(3) which stipulates “The person in possession of the bobcat pelts or parts thereof shall have in their possession the documents required herein and shall present the documents upon the request of the department.”. This change provides clarity in identifying all importation requirements as numbered subsections of (b).

The new subsection (b)(3) also further indicates that the required documents for importing a bobcat must not only be available upon request of the Department but must also be in possession of the person importing the bobcat at the time of import. This change is necessary because possession of the required documents at the time of importation is a requirement of section 712.5 regarding the declaration of importation of dead fish and wildlife and the documentation incorporated by reference in that Section.

Subsection (c) is added to describe the documentary requirements of fur products including the requirement for the completion of the Declaration of Dead Wildlife form DFW 901 as described in subsection (b)(2), when importing or receiving from out of state, the pelt of any furbearing or nongame mammal.

Subsection (d) is added to describe the requirement that a record of sale or trade must be maintained by the seller, for a period of one year, when selling or trading a “used fur product” per Fish and Game Code Section 2023(a)(5), or an exempt fur product as described in Fish and Game Code Section 2023(c).

Subsections (d)(1) – (d)(5) list the minimum information to be included in a bill of sale for a used fur product. These are the minimum informational elements necessary for the Department’s Law Enforcement Division to be able to determine the authenticity and provenance of a “used fur product”.

Section 696

This section is repealed in its entirety. The Fur Dealer License and Fur Agent Licenses described within Section 696 were subject to Fish and Game Code Section 4001 (Assembly bill 273 from the 2019-20 legislative session), which made it unlawful to trap any fur-bearing mammal or nongame mammal for purposes of recreation or commerce in fur and prohibited the sale of the raw fur of any fur-bearing mammal or nongame mammal otherwise lawfully taken.

(b) Goals and Benefits of the Regulation

The goal of the proposed regulations is to maintain consistency with new Statute in Fish and Game Code. Three recent bills, AB273, AB1254 and AB44 from the 2019-2020 legislative session changed the legal framework for recreational fur trapping and the possession or exchange of raw fur and new and used fur products in California. Existing regulations regarding the use of traps are out of date with respect to these changes and require substantive updates to maintain consistency with new law. Additionally minor conforming changes are also included for clarity and consistency in conveying these regulations for the public.

(c) Authority and Reference Sections from Fish and Game Code for Regulation

Section 251.5

Authority cited: Sections 200, 203, 3800 and 4150, Fish and Game Code. Reference: Sections 2000, 2001, 3005.5, 3965, 4001, 4150, and 4650, Fish and Game Code.

Section 465.5

Authority cited: Sections 200, 203, 3005.5, 4001, 4005, and 4009.5, Fish and Game Code.

Reference: Sections 3003.1, 3005.5, 3950, 3965, 4000, 4001, 4004, 4005, 4150, 4152, 4180 and 4700, Fish and Game Code.

Section 467

Authority cited: Sections 200, 203, 1050, 4005, 4008, 4009.5 and 4150, Fish and Game Code.

Reference: Sections 4000, 4001, 4002, 4003, 4004, 4005, 4006, 4007, 4008, 4009, 4009.5, 4010, 4011, 4150, 4152, and 4180 Fish and Game Code.

Section 474

Authority cited: Sections 3000 and 4150, Fish and Game Code.

Reference: Sections 3000, 4001, 4152 and 4180 and 4150, Fish and Game Code.

Section 478

Authority cited: Sections 200, 265, 4150, 4155, 4157, 4158 and 4181. Fish and Game Code.

Reference: Sections 3960, 4150, 4155, 4157 and 4158, Fish and Game Code.

Section 479

Authority cited: Sections 2353, 4150, 4155, 4157 and 4158, Fish and Game Code.

Reference: Sections 2023, 2353, 3003.1, 4150, 4155, 4157 and 4158, Fish and Game Code.

(d) Specific Technology or Equipment Required by Regulatory Change. None.

(e) Identification of Reports or Documents Supporting Regulation Change. None.

(f) Public Discussions of Proposed Regulations Prior to Notice Publication

IV. Description of Reasonable Alternatives to Regulatory Action

(a) Alternatives to Regulation Change

No alternatives were identified by or brought to the attention of Commission staff that would have the same desired regulatory effect.

(b) No Change Alternative

The no change alternative would mean that existing regulations concerning recreational trapping remain inconsistent with respect to current law.

V. Mitigation Measures Required by Regulatory Action

The proposed regulatory action will have no negative impact on the environment; therefore, no mitigation measures are needed.

VI. Impact of Regulatory Action

The potential for significant statewide adverse economic impacts that might result from the proposed regulatory action has been assessed, and the following initial determinations relative to the required statutory categories have been made:

(a) Significant Statewide Adverse Economic Impact Directly Affecting Businesses, Including the Ability of California Businesses to Compete with Businesses in Other States.

The Commission does not anticipate significant statewide adverse economic impact directly affecting businesses, including the ability of California businesses to compete with businesses in other states because the proposed regulations are to conform to current law that is already observed and to make minor clarifying and conforming changes.

(b) Impact on the Creation or Elimination of Jobs Within the State, the Creation of New Businesses or the Elimination of Existing Businesses, or the Expansion of Businesses in California; Benefits of the Regulation to the Health and Welfare of California Residents, Worker Safety, and the State's Environment.

The Commission does not anticipate any impacts on the creation or elimination of jobs, the creation of new business, the elimination of existing businesses or the expansion of businesses in California because the proposed regulation is administrative in nature. The Commission anticipates general benefits to the health and welfare of California residents, and no impacts to worker safety, or to the state's environment.

(c) Cost Impacts on a Representative Private Person or Business

The agency is not aware of any cost impacts because the proposed regulations are to conform to current law that is already observed and to make minor clarifying and conforming changes

(d) Costs or Savings to State Agencies or Costs/Savings in Federal Funding to the State

(e) Nondiscretionary Costs/Savings to Local Agencies: None.

(f) Programs Mandated on Local Agencies or School Districts: None.

(g) Costs Imposed on Any Local Agency or School District that is Required to be Reimbursed Under Part 7 (commencing with Section 17500) of Division 4, Government Code: None.

(h) Effect on Housing Costs: None.

VII. Economic Impact Assessment

(a) Effects of the Regulation on the Creation or Elimination of Jobs Within the State

The Commission does not anticipate any impacts on the creation or elimination of jobs within the state, as the proposed regulations are to conform to current law that is already observed and to make minor clarifying and conforming changes.

(b) Effects of the Regulation on the Creation of New Businesses or the Elimination of Existing Businesses Within the State

The Commission does not anticipate any impacts on the creation or elimination of jobs, the creation of new business, the elimination of existing businesses or the expansion of businesses within the state. The proposed regulations are to conform to current law that is already observed and to make minor clarifying and conforming changes, which introduces no new adverse economic impacts to businesses that would change their operations.

(c) Effects of the Regulation on the Expansion of Businesses Currently Doing Business Within the State

The Commission does not anticipate any impacts on the expansion of businesses in California because this action will not affect the demand for goods and services.

(d) Benefits of the Regulation to the Health and Welfare of California Residents

The proposed regulation is intended to provide clarity and consistency with current law for the public.

(e) Benefits of the Regulation to Worker Safety:

The Commission does not anticipate any benefits to worker safety in California because this action will not affect working conditions.

(f) Benefits of the Regulation to the State's Environment:

The Commission does not anticipate any benefits to the State's environment from the proposed regulation as it is intended to provide clarity and consistency with current law for the public.

(g) Other Benefits of the Regulation

The proposed regulation is intended to provide clarity and consistency with current law for the public.

Informative Digest/Policy Statement Overview

The amendments to Section 251.5, 465.5, 467, 474, 478 and 479 and removal of section 696 of Title 14, California Code of Regulations are necessary to maintain consistency with new statute in Fish and Game Code Section 4001 (Assembly bill 273, 2019-20 legislative session) which made it unlawful to trap any furbearing mammal or nongame mammal for purposes of recreation or commerce in fur and prohibits the sale of the raw fur of any fur-bearing mammal or nongame mammal otherwise lawfully taken. The bill eliminated the Licensed Fur Dealer and Licensed Fur Agent licenses that the department previously sold. Current regulations in sections 251.5, 465.5, 467, 474 and 696 are also out of date with respect to these requirements.

The Department recommends changes to the following sections:

251.5 Possession of Game Birds, Game Mammals, Exotic Game Mammals, Furbearers, Nongame Birds and Nongame Mammals.

Revise Section title, remove reference to an outdated permit for the possession of a mountain lion, remove reference to the recreational trapping of mammals and update terms for consistency with statute.

465.5 Use of Traps.

Remove conditional reference to body gripping traps and update to state that no traps, body gripping or otherwise, are lawful for recreational use. Remove stipulation for trap type when stating the prohibition on purchase, barter or exchange of raw fur. Make minor clarifying changes to the language referencing a tenant or designee, who will accomplish depredation trapping. Reference to a new form "DFW 1389e" is added, to aid individuals in obtaining the referenced "trap number issued by and registered with the department" in new subsection (f).

467 Annual Statement of Licensee. Trapping Reports.

Update to state that trappers shall report their take of furbearing and nongame mammals rather than their take of fur. Specify that trapping reports shall specify whether "take" was lethal or nonlethal. Update the stated penalty for non-reporting for consistency with Fish and Game Code Section 4008.

474 Hours for Taking of Nongame Mammals.

Revise Section title clarifying that these provisions are relevant to the taking of 'nongame mammals' and clarifying that take on private property is only allowed for the owner, tenant, or a person in possession of written permission.

478 Bobcat.

Hunting of bobcat is unlawful unless under specific permits or depredation is occurring. Trapping of bobcat is unlawful except under depredation. It is unlawful to sell or export any pelt or part of bobcat taken under a depredation permit.

479 Bobcat Pelts and Fur Products.

It is unlawful to possess any pelt or part without a department mark or shipping tag not legally taken prior to 2020. If the bobcat or parts are imported from outside California, the pelt must have a CITES tag, or be accompanied by a Declaration of Importation with proof of lawful take.

It is unlawful for the pelt of any other furbearing mammal imported to California to be possessed without a Declaration of Importation form. Persons who sell or trade “used fur product” must maintain complete records of each item. The sale and trade of fur products for religious purposes to Native American Tribes is exempt.

696 Fur Dealer and Fur Agent Licenses. Repealed.

Benefits of the regulations:

The goal of the proposed regulations is to maintain consistency with new Statute in Fish and Game Code. Three recent bills, AB273, AB1254 and AB44 from the 2019-2020 legislative session changed the legal framework for recreational fur trapping and the possession or exchange of raw fur and new and used fur products in California. Existing regulations regarding the use of traps are out of date with respect to these changes and require substantive updates to maintain consistency with new law. Additionally minor conforming changes are also included for clarity and consistency in conveying these regulations for the public.

Evaluation of incompatibility with existing regulations:

The Commission has reviewed its regulations in Title 14, CCR, and conducted a search of other regulations on this topic and has concluded that the proposed amendments to Sections 251.5, 465.5, 467, 474, 478, 478.1, 479 and 550 and the repeal of 696 are neither inconsistent nor incompatible with existing State regulations. No other State agency has the authority to promulgate hunting regulations.

Proposed Regulatory Language

Section 251.5, Title 14, California Code of Regulations, is hereby amended as follows:

§ 251.5. Possession of Game Birds, Game Mammals, Exotic Game Mammals, Furbearers, Nongame Birds and Nongame Animals Mammals, Possession Of.

- (a) Migratory game birds may not be held beyond the period provided by the federal regulations and in accordance with the daily bag and possession limits prescribed by these regulations (see sections 257 and 502).
- ~~(b) Live mountain lions may be possessed only under terms of a permit issued by the Department pursuant to section 2150 of the Fish and Game Code or if the owner can demonstrate that the mountain lion was in his/ her possession on or before June 6, 1990, under a permit issued pursuant to section 3200 of said code.~~
- ~~(c)~~(b) Every game bird, game mammal, exotic game mammal, furbearer ~~or nongame animal, nongame bird, or nongame mammal,~~ taken under the authority of a hunting ~~or trapping~~ license ~~and reduced to possession by the hunter, or trapper~~ shall be immediately killed and become a part of the daily bag limit.

NOTE: Authority cited: Sections 200, 203, ~~265, 275, 3005.5,~~ 3800 and 4150, Fish and Game Code. Reference: Sections ~~110, 200, 201, 203, 203.1, 265, 275,~~ 2000, 2001, 3005.5, ~~3800, 3965,~~ 4001, 4150, and ~~4650 and 4800,~~ Fish and Game Code.

Proposed Regulatory Language

Section 465.5, Title 14, California Code of Regulations, is hereby amended as follows:

§ 465.5. Use of Traps.

- (a) Traps Defined. Traps are defined to include padded-jaw leg-hold, steel-jawed leg-hold, and conibear traps, snares, dead-falls, cage traps and other devices designed to confine, hold, grasp, grip, clamp or crush animals' bodies or body parts. ~~A body-gripping trap is one that grips the mammal's body or body part, including, but not limited to, steel-jawed leg-hold traps, padded-jaw leg-hold traps, conibear traps, and snares.~~
- (b) Affected Mammals Defined. For purposes of this section, furbearing mammals, game mammals, exotic game mammals, nongame mammals, and protected mammals are those mammals so defined by statute on July 1, 2024, in sections 3950, 3965, 4000, 4150 and 4700 of the Fish and Game Code.
- (c) Prohibition on Trapping for the Purposes of Recreation or Commerce in Fur. It is unlawful for any person to trap for the purposes of recreation or commerce in fur any furbearing mammal or nongame with any body-gripping trap. ~~A body-gripping trap is one that grips the mammal's body or body part, including, but not limited to, steel-jawed leg-hold traps, padded-jaw leg-hold traps, conibear traps, and snares. Cage and box traps, nets, suitcase-type live beaver traps, and common rat and mouse traps shall not be considered body-gripping traps and may be used to trap for the purposes of recreation or commerce in fur any furbearing or nongame mammal.~~
- (d) Prohibition on Exchange of Raw Fur. It is unlawful for any person to buy, sell, barter, or otherwise exchange for profit, or to offer to buy, sell, barter, or otherwise exchange for profit, the raw fur, as defined by Section 4005 of the Fish and Game Code, of any furbearing mammal or nongame mammal that was trapped in this State, ~~with a body-gripping trap as described in subsection (c) above.~~
- (e) Prohibition on Use of Steel-jawed Leg-hold Traps by Individuals. It is unlawful for any person to use or authorize the use of any steel-jawed leg-hold trap, padded or otherwise, to capture any game mammal, exotic game mammal, furbearing mammal, nongame mammal, protected mammal, or any dog or cat.
 - (1) Exception for Extraordinary Case to Protect Human Health or Safety. The prohibition in subsection (e) does not apply to federal, state, county, or municipal government employees or their duly authorized agents in the extraordinary case where the otherwise prohibited padded-jaw leg-hold trap is the only method available to protect human health or safety.
 - (A) Leg-hold Trap Requirements. Leg-hold traps used to implement subsection (e)(1) must be padded, commercially manufactured, and equipped as provided in subsections (A)1. through (A)5. below.
 - 1. Anchor Chains. Anchor chains must be attached to the center of the padded trap, rather than the side.

2. Chain Swivels. Anchor chains must have a double swivel mechanism attached as follows: One swivel is required where the chain attaches to the center of the trap. The second swivel may be located at any point along the chain, but it must be functional at all times.
3. Shock Absorbing Device. A shock absorbing device such as a spring must be in the anchor chain.
4. Tension Device. Padded leg-hold traps must be equipped with a commercially manufactured pan tension adjusting device.
5. Trap Pads. Trap pads must be replaced with new pads when worn and maintained in good condition.

~~(f) Use of Non-Body Gripping Traps for Purposes of Recreation or Commerce in Fur. Any person who utilizes non-body-gripping traps for the take of furbearing mammals and nongame mammals for purposes of recreation or commerce in fur must comply with the provisions of subsections (g)(1) through (3) below.~~

~~(1)~~(f) Trap Number Requirement. Any person or their designee who traps furbearing mammals or nongame mammals shall obtain a trap number issued by and registered with the department by completing the Depredation Trap Numbering form provided by the department available on the department's website at <https://wildlife.ca.gov/Licensing/Directory>. Information required by the form includes the current date, primary contact individual's first and last name, (if for a business, the name of the business); telephone number, residence or business address, or parcel number(s). All traps, before being put into use, shall bear only the current registered trap number or numbers of the person using, or in possession of those traps. This number shall be stamped clearly on the trap or on a metal tag attached to the chain of the trap or to any part of the trap.

(g) Use of Conibear Traps, Snares, Cage and Box Traps, Nets, Suitcase-type Live Beaver Traps and Common Rat and Mouse Traps for Purposes Unrelated to Recreation or Commerce in Fur. Conibear traps, snares, cage and box traps, nets, suitcase-type live beaver traps and common rat and mouse traps may be used by individuals to take authorized mammals for purposes unrelated to recreation or commerce in fur, including, but not limited to, the protection of property, in accordance with subsections (1) through (5) below. Except for common rat and mouse traps, all traps used pursuant to this subsection must be numbered as required by subsection (f) ~~(1)~~ above. ~~The prohibitions of subsections (c) and (d) above shall apply to any furbearing or nongame mammal taken by a conibear trap or snare pursuant to this subsection (g).~~

(1) Immediate Dispatch or Release. All furbearing and nongame mammals that are legal to trap must be immediately killed or released. Unless released, trapped animals shall be killed by shooting where local ordinances, landowners, and safety permit. This regulation does not prohibit employees of federal, state, or local government from using chemical euthanasia to dispatch trapped animals.

(2) Trap Visitation Requirement. All traps shall be visited at least once daily ~~by the owner of the traps or his/her designee~~ and animals removed by the owner or tenant of the premises, or by their authorized representative employees, agents or trapping service.

(A) ~~Such designee representative shall carry on his/her~~ their person written authorization, as owner's or tenant's representative to place and to check traps.

(B) ~~In the event that an unforeseen medical emergency prevents the owner or tenant, or their representative of the traps from visiting traps another person may, with written authorization from the trap's owner, check traps as required.~~

~~The designee and the person who issues the authorization to check traps shall comply with all provisions of Section 465.5. Each time traps are checked all trapped animals shall be removed.~~

. . . *[No changes to subsections (g)(3) through (h)]*

NOTE: Authority cited: Sections 200, 203, 219, 265, 3003.1, 3005.5, 4001, 4005, and 4009.5, Fish and Game Code.

Reference: Sections ~~410, 200, 203, 203.1, 265, 3003.1, 3005.5, 3950, 3965, 4000, 4001, 4004, 4005, 4009.5, 4150, 4152, 4180 and 4700~~, Fish and Game Code.

Proposed Regulatory Language

Section 467, Title 14, California Code of Regulations, is hereby amended as follows:

§ 467. Annual Statement of Licensee. Trapping Reports.

~~All holders of trapping licenses must submit to the department a sworn statement or report by July 1 of his/her annual take of fur for the preceding trapping season. Statement or report shall show the number of each kind of furbearing mammals and nongame mammals taken, number sold, county in which furs were taken and the names and addresses of the persons to whom furs were shipped or sold. If the annual report is not received by July 1 following the most recent trapping year, or if it is not completely filled out, the trapper's license will be suspended. The commission shall be notified of any suspension and, subsequently, may revoke or reinstate applicant's license renewal application after written notice is given to the applicant and after he has been afforded an opportunity to be heard.~~

(a) Annual Statement of Licensee. All holders of trapping licenses shall submit to the department a sworn annual statement by July 1 following their previous license year's take of fur bearing mammals and nongame mammals on an Annual Statement of Licensee form provided by the department, available on the department's website at <https://wildlife.ca.gov/Licensing/Directory>.

- (1) The Annual Statement Of Licensee shall include: the number taken of each kind of furbearing mammals and nongame mammals; the county in which each animal was taken; and whether take was lethal or nonlethal.
- (2) Licensees who did not take any furbearing or nongame mammals shall submit to the department a sworn annual statement by indicating "zero" or "no take".
- (3) A licensee shall ensure, to the extent possible, that trapping activities do not result in incidental take of wildlife. Any incidental take shall be reported by the licensee to the department with the required information for the species taken.
 - (A) If an animal is not injured as a result of incidental take, it shall be immediately released.
 - (B) If an animal is orphaned or injured as a result of incidental take, the licensee may transport the injured animal to the nearest permitted wildlife rehabilitator as provided in Section 679.2. The Annual Statement of Licensee shall record the name of the rehabilitator and the date of transfer if such action was taken.
 - (C) If an animal is killed as a result of incidental take, the licensee shall dispose of the carcass pursuant to all federal, state, and local jurisdiction requirements.
- (4) Take of State or Federal Threatened or Endangered Species. Any incidental take of state or federally listed threatened, endangered, or candidate wildlife, or wildlife designated as fully protected in the State of California shall be reported by the licensee to the department with the required information for the species taken (if any), as set forth in subsection (a). The licensee shall also report any take to the nearest U.S. Fish and Wildlife Service (USFWS) Ecological Services Field Office within 7 calendar days of

the take and provide in writing his or her name, license number, date, species and sex (if known) of the animal taken, and exact location of the take as provided in 50 CFR 21.

(b) If the Annual Statement Of Licensee is not received by July 1 following the previous license year, or if the statement is incomplete, the trapper's license will be suspended, or the trapper's license application will be denied. The license or application will remain suspended or denied until the department receives the completed statement. Holders of trapping licenses may verify the reporting status of their current license by logging into Online License Sales and Services (available at <https://wildlife.ca.gov/Licensing/Online-Sales>) and selecting "License Reporting."

(c) Acknowledgement and Signature. In accordance with FGC Section 4008, "I certify under penalty of perjury that the information submitted in this Annual Statement of Licensee is complete and accurate to the best of my knowledge and belief that the wildlife described herein were legally taken and legally possessed. I understand that any false statement or omission may be subject to civil, criminal, and administrative penalties under the laws of the State of California." If an applicant signs the application electronically, the following language is included: "With accordance to California Civil Code §1633.5(b), I acknowledge that by providing my electronic signature for this form, I agree that my electronic signature is legal binding equivalent to a handwriting signature. I hereby confirm that my electronic signature represents my execution or authentication of this form, and my intent to be bound by it."

NOTE: Authority cited: Sections 200, 203, ~~265~~, 1050, 4005, 4008, 4009.5 and 4150, Fish and Game Code.

Reference: Sections ~~110, 200, 201, 203, 203.1, 260, 265, 270, 275, 4000, 4001, 4002, 4003, 4004, 4005, 4006, 4007, 4008, 4009, 4009.5, 4010, 4011 and 4012,~~4150, 4152, and 4180 Fish and Game Code.

Proposed Regulatory Language

Section 474, Title 14, California Code of Regulations, is hereby amended as follows:

§ 474. Hours for Taking of Nongame Mammals.

(a) Nongame mammals may be taken at any time except as provided in this section. This section does not pertain to the legal take of nongame mammals with traps.

~~(a)-(b)~~ Area Closed to Night Hunting. Nongame mammals may be taken only between one-half hour before sunrise and one-half hour after sunset in the following described area:

Beginning at a point where Little Panoche Road crosses Interstate 5 near Mendota; south on Interstate 5 to Highway 198; east on Highway 198 to Highway 99; south on Highway 99 to Interstate 5; south on Interstate 5 to the Los Padres National Forest boundary in Section 8, T 9 N, R 19 W, S.B.B.M near Fort Tejon Historical Monument; west along the National Forest boundary to Cerro Noroeste Road; northwest on Cerro Noroeste Road to Highway 33-166; north on Highway 33-166 to the Soda Lake Road; northwest on the Soda Lake Road and on the Simmler Soda Lake San Diego Creek Road to Highway 58 at Simmler; west on Highway 58 to the Cammotti Shandon Road; north on the Cammotti Shandon Road to the Shandon San Juan Road; north on the Shandon San Juan Road to Highway 41; northeast on Highway 41 to the Cholame Valley Road; northwest on Cholame Valley Road and Cholame Road to the Parkfield Coalinga Road in Parkfield; north on Parkfield Coalinga Road and Parkfield Grade to Highway 198; northwest on Highway 198 to the Fresno-Monterey county line; north along the Fresno-Monterey county and Fresno-San Benito county lines to the Little Panoche Road; north and east on the Little Panoche Road to the point of beginning at Interstate 5.

~~This section does not pertain to the legal take of nongame mammals with traps as provided for by Sections 461-480 of these regulations, and by Sections 4000, 4012, 4152 and 4180 of the Fish and Game Code. (This regulation supersedes Section 3000 of the Fish and Game Code.)~~

~~(b)-(c)~~ On privately-owned property, not included in ~~(a)-(b)~~ above, nongame mammals may be taken from one-half hour after sunset to one-half hour before sunrise only.:

(1) by the landowner or ~~his agents~~, their tenant; or

(2) by persons who have in their immediate possession written permission issued by the landowner or their tenant to enter the property for the purpose of taking nongame mammals. ~~that states the permittee can trespass from one-half hour after sunset to one-half hour before sunrise on property under the ownership or control of such landowners or tenants.~~

~~(c)-(d)~~ Fallow deer, axis deer, sambar deer, sika deer, aoudad, mouflon, tahr and feral goats may be taken only from one-half hour before sunrise to one-half hour after sunset.

NOTE: Authority cited: Sections 3000 and 4150, Fish and Game Code.

Reference: Sections 3000, 4001, 4152 and 4180 and 4150, Fish and Game Code.

Proposed Regulatory Language

Section 478, Title 14, California Code of Regulations, is hereby amended as follows:

§ 478. Bobcat.

- (a) It shall be unlawful to hunt, trap, pursue, take or possess any bobcat without first procuring a hunting license and bobcat hunting tags, or depredation permit issued pursuant to Section 401 of these regulations as in subsection (b) below. ~~This Section shall not apply to bobcats taken for purposes of property protection pursuant to Section 4152 of the Fish and Game Code and Section 401 of these regulations.~~
- (b) ~~Hunting: The pursuit, take, or possession of a bobcat under the authority of a hunting license and a bobcat hunting tag shall be in accordance with the provisions of Section 3960 of the Fish and Game Code, this Section, and sections 472, 473, 474, 475, 478.1 and 479 of these regulations. Bobcats may be taken statewide under the authority of a hunting license and bobcat hunting tags between October 15 through February 28. The bag and possession limit is five bobcats per season.~~
- (~~e~~)(b) Trapping: It shall be unlawful to trap any bobcat, or attempt to do so, or except as provided in Section 401 of these regulations. Bobcats taken pursuant to a depredation permit shall be disposed of as required in the permit. It shall be unlawful to sell or export any bobcat or part of any bobcat taken in the State of California. Any holder of a trapping license person who traps a bobcat that is not the target species identified in a depredation permit issued by the department shall immediately release any the bobcat to the wild that is healthy and unharmed. A bobcat trapped that is injured, diseased, or orphaned shall be transferred to a native wildlife rehabilitation permittee in accordance with Section 679.2 of these regulations.

NOTE: Authority cited: Sections 200, 265, 4150, ~~and 4155~~, 4157, 4158 and 4181. Fish and Game Code. Reference: Sections 3960, 4150, ~~and 4155~~, 4157 and 4158, Fish and Game Code.

Proposed Regulatory Language

Section 479, Title 14, California Code of Regulations, is hereby amended as follows:

§ 479. Bobcat Pelts and Fur Products.

- (a) Except for bobcats lawfully taken under a hunting license prior to January 1, 2020 and tagged with a completed bobcat hunting tag as set forth in Section 478.1 affixed to the pelt, or as provided in subsection 479(b), it shall be unlawful for any person to possess, whether for sale, export, or personal use, any bobcat pelt or part thereof taken in California without a department mark or shipping tag affixed to the pelt or part. Beginning November 20, 2015, the department shall not affix a department mark or shipping tag on any bobcat pelt.
- (b) It is unlawful for any person to import, receive from out-of-state, or receive for sale, any bobcat pelt, or parts thereof that is not:
- (1) Marked with the current United States Fish and Wildlife Service Convention on International Trade in Endangered Species export or shipping tag (50 CFR Part 23) from the state of origin; and
 - (2) Accompanied by ~~an import declaration in accordance with Section 2353 of the Fish and Game Code, and~~ a Declaration of Importation of Dead Wildlife form DFW 901, executed and submitted to the Department on paper or online, as provided in Section 712.5, specifying the number and kind of raw pelts ~~in the shipment~~, the state in which the bobcats were taken, the license number under which they were taken and attesting that they were legally taken. ~~Demonstration of the declaration of entry, pelt ownership and proof of legal take and marking is required of anyone receiving bobcat pelts from out-of-state upon the request of the department.~~
 - (3) The person in possession of the bobcat pelts or parts thereof shall have in their possession the documents required herein and shall present the documents upon the request of the department.
- (c) It is unlawful for any person to import, receive from out-of-state, or receive for sale, the pelt of any furbearing or nongame mammal that is not accompanied by the Declaration of Dead Wildlife form DFW 901 as described in (b)(2).
- (d) A person who sells or trades a “used fur product” or an exempt “fur product” shall maintain a record of sale or trade for each item for at least one year. The record of sale for a used fur product shall contain at minimum the following information:
- (1) The first and last name of the seller and first and last name of the buyer,
 - (2) The date, location and purchase price for the sale,
 - (3) A complete description each individual used fur product or exempt fur product including, brand and model name/number or identifying markings/labels applied, and
 - (4) The size, color, and species of furbearing or nongame animal(s) fur that comprising the fur product.

(5) In addition to the above information, a person who sells or trades an exempt “fur product” for religious purposes and/or traditional tribal, cultural, or spiritual purposes by a member of a federally recognized Native American tribe or a nonfederally recognized California Native American tribe listed on the California Tribal Consultation List maintained by the Native American Heritage Commission, shall indicate the tribal or religious affiliation allowing for the exemption to sell or trade a fur product.

NOTE: Authority cited: Sections 2353, 3003.1, 4150, ~~and 4155~~, 4157 and 4158, Fish and Game Code. Reference: Sections 2023, 2353, 3003.1, 4150, ~~and 4155~~, 4157 and 4158, Fish and Game Code.

Proposed Regulatory Language

Section 696, Title 14, California Code of Regulations, is repealed:

~~§ 696. Fur Dealer and Fur Agent Licenses.~~

~~(a) Fur Dealer License. Every person engaging in, carrying on, or conducting, wholly or in part, the business of buying, selling, trading or dealing in raw furs of furbearing mammals or nongame mammals shall first procure a fur dealer license.~~

~~Each licensed fur dealer shall submit, not later than July 1, to the Department of Fish and Wildlife at 1416 Ninth Street, Sacramento, California 95814 (or by postal delivery to P.O. Box 944209, Sacramento, CA 94244-2090), an annual report on forms provided by the department.~~

~~(b) Fur Agent License. Any person employed by a licensed fur dealer to engage in the business of buying, selling, trading or dealing in raw furs only on behalf of the fur dealer, and not on his own behalf, shall first procure a fur agent license, providing that the fur dealer employing that person has submitted the annual report required in (a) above. Such licenses shall be valid for a term of one year from July 1, or if issued after the beginning of such term, for the remainder thereof.~~

~~(c) It shall be unlawful for any fur dealer or fur agent to purchase the raw fur of any furbearing mammal or nongame mammal from any person who does not hold a valid trapping license, fur dealer license, or fur agent license.~~

NOTE: Authority cited: Sections 4009.5, 4042 and 4150, Fish and Game Code. Reference: Sections 4009.5, 4030-4043 and 4150, Fish and Game Code.

MEMORANDUM

Date: September 16, 2026

To: Melissa Miller-Henson
Executive Director
California Fish and Game Commission

From: Meghan Hertel
Director

Subject: **Submission of Initial Study and Negative Declaration for Proposed Amendments to Sections 251.5, 465.5, 467, 474, 478, 479, and the Repeal Section 696 Title 14, California Code of Regulations, Mammal Trapping Consistency with Statute**

In compliance with the California Environmental Quality Act, the California Department of Fish and Wildlife (Department) has prepared the enclosed *Initial Study/Negative Declaration for Proposed Amendments to Sections 251.5, 465.5, 467, 474, 478, 479, and the Repeal Section 696 Title 14, California Code of Regulations, Mammal Trapping Consistency with Statute*. Based on the initial study, the Department has assessed that the proposed amendments will not have any significant or potentially significant effects on the environment. The Department recommends the California Fish and Game Commission adopt the proposed negative declaration with a conclusion of the same.

If you have any questions or need additional information, please contact Scott Gardner, Wildlife Branch Chief, at Scott.Gardner@wildlife.ca.gov. The Department point of contact for this regulation should identify Matt Meshriy, Upland and Small Game Biologist, who can be reached at Matt.Meshriy@wildlife.ca.gov.



Melissa Miller-Henson, Executive Director
California Fish and Game Commission
September 16, 2026
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cc: Chad Dibble, Deputy Director
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**State of California
Natural Resources Agency**

California Fish and Game Commission

**DRAFT Negative Declaration for
Proposed Regulatory Amendments for
Mammal Trapping Consistency with Statute**

**Amend Sections 251.5, 465.5, 467, 474, 478 and 479
Repeal Section 696
Title 14, California Code of Regulations**

Prepared by:

California Department of Fish and Wildlife, Wildlife Branch
on behalf of the California Fish and Game Commission

July 2026

This Report Has Been Prepared Pursuant to the
California Environmental Quality Act of 1970

State Clearinghouse #

Project Description and Background Information

Introduction

Unless otherwise specified, all section references in this document are to Title 14 of the California Code of Regulations (CCR).

The California Fish and Game Commission (Commission) proposes to amend sections 251.5, 465.5, 467, 474, 478, and 479, and repeal Section 696 of Title 14, CCR.

The proposed regulations are necessary to maintain consistency with recent statutory changes in Fish and Game Code Section 4001 (Assembly bill 273, 2019-20 legislative session) which made it unlawful to trap any furbearing mammal or nongame mammal for purposes of recreation or commerce in fur and prohibits the sale of the raw fur of any furbearing mammal or nongame mammal otherwise lawfully taken. The bill eliminated the Licensed Fur Dealer and Licensed Fur Agent licenses that the California Department of Fish and Wildlife (Department) previously sold. Current regulations in sections 251.5, 465.5, 467, 474 and 696 are out of date with respect to these requirements.

Fish and Game Code Sections 4157 and 4158 (Assembly bill 1254, 2019-20 legislative session) made it unlawful to hunt, trap, or otherwise take a bobcat, except under specified circumstances, including under a depredation permit. The bill's specified appropriation has been made by the Legislature to the Department to develop a bobcat management plan to inform and coordinate management decisions regarding bobcat populations. Current regulations in CCR Title 14, Section 478 are out of date with respect to current requirements for depredation of bobcats.

Fish and Game Code Section 2023 (Assembly bill 44, 2019-20) became fully operative on January 1, 2023, and made it unlawful to sell, offer for sale, display for sale, trade, or otherwise distribute for monetary or nonmonetary consideration a fur product, as defined, in the state. The statute also made it unlawful to manufacture a fur product in the state for sale. The statute exempted used fur products, as defined, fur products used for specified purposes, and any activity expressly authorized by federal law. The statute requires a person that sells or trades any fur product exempt from this prohibition to maintain records of each sale or trade of an exempt fur product for at least one year, except as provided. Current regulations in CCR Title 14, Section 479 are out of date with respect to these requirements.

Project Goals and Objectives

The amendments to the trapping regulations are designed to provide consistency and conformity to current statutes, and to make minor conforming changes to increase the clarity and consistency of these regulations and make other relatively minor improvements.

Project Location

California-Statewide

Schedule

The proposed regulatory amendments described below will go into effect on or around July 1, 2027.

Project Summary

Amend Title 14, Section 251.5, Possession of Game Birds, Game Mammals, Exotic Game Mammals, Furbearers, Nongame Birds and Nongame Mammals.

Revise Section title, remove reference to an outdated permit for the possession of a mountain lion, remove reference to the recreational trapping of mammals and update terms for consistency with statute.

Amend Title 14, Section 465.5, Use of Traps.

Remove conditional reference to body gripping traps and update to state that no traps, body gripping or otherwise, are lawful for recreational use. Remove stipulation for trap type when stating the prohibition on purchase, barter or exchange of raw fur. Make minor clarifying changes to the language referencing a tenant or designee, who will accomplish depredation trapping. Reference to a new form "DFW 1389e" is added, to aid individuals in obtaining the referenced "trap number issued by and registered with the department" in new subsection (f).

Amend Title 14, Section 467, Annual Statement of Licensee. Trapping Reports.

Update to state that trappers shall report their take of furbearing and nongame mammals rather than their take of fur. Specify that trapping reports shall specify whether "take" was lethal or nonlethal and document instances when injured or orphaned wildlife is transferred to a permitted wildlife rehabilitator. Update the stated discipline for non-reporting.

Amend Title 14, Section 474, Hours for Taking of Nongame Mammals.

Revise Section title to clarify that these provisions are relevant to the taking of 'nongame mammals' and that take on private property is only allowed for the owner, tenant, or a person in possession of written permission.

Amend Title 14, Section 478, Bobcat.

Revise Section to state that depredation of bobcat is unlawful unless under authority of a depredation permit (a bobcat in the act of injuring or killing livestock may be taken immediately provided the property owner or tenant applies for a permit from the department the next working day following the take). Revise to strike the indicated hunting season dates, as hunting of bobcat is lawful only under the conditions of a bobcat hunting tag. The California Fish and Game Commission does not currently authorize any hunting tag for bobcats pursuant to the requirement in FGC 4157(a).

Amend Title 14, section 479, Bobcat Pelts and Fur Products.

Revise section to state that it is unlawful to possess any pelt or part without a department mark or shipping tag not legally taken prior to 2020. Revise to state that if the bobcat or parts are imported from outside California, the pelt must have a Convention on International Trade in Endangered Species (CITES) tag or be accompanied by a Declaration of Importation with proof of lawful take.

Revise section to state that it is unlawful for the pelt of any other furbearing mammal imported to California to be possessed without a Declaration of Importation form. Revise to state that persons who sell or trade "used fur product" must maintain complete records of

each item. The sale and trade of fur products for religious purposes among Native American Tribes is exempt from the prohibition on sale or trade but is subject to the required bill of sale to be documented and maintained for a period of one year.

Repeal 696 Fur Dealer and Fur Agent Licenses.

Findings

The Commission's review of the project showed that the project will not have any significant or potentially significant effects on the environment, and therefore no alternatives or mitigation measures are proposed to avoid or reduce any significant effects on the environment. The project will not have a significant effect on aesthetics, agriculture and forestry resources, air quality, biological resources, cultural resources, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, public services, recreation, transportation, tribal cultural resources, utilities and service systems, and wildfire.

Basis of the Findings

Based on the Initial Study, implementing the project will not have any significant or potentially significant effects on the environment. Therefore, the Commission is filing this negative declaration pursuant to the California Environmental Quality Act, Public Resources Code Section 21080, subdivision (c).

This proposed negative declaration consists of the following:

- Introduction – Project Description and Background Information
- Initial Study Environmental Checklist Form
- Explanation of the Response to the Initial Study Environmental Checklist Form

Environmental Checklist Form

1. Project Title:
Proposed Amendments to Title 14, CCR: Mammal Trapping Consistency with Statute
2. Lead Agency Name and Address:
California Fish and Game Commission
715 P Street, 16th Floor, or
P.O. Box 944209
Sacramento, CA 94244-0002
3. Contact Person and Phone Number:
Melissa Miller-Henson, (916) 653-7229
4. Project Location: Statewide California
5. Project Sponsor's Name and Address:
California Department of Fish and Wildlife
Law Enforcement Division
P.O. Box 944209
Sacramento, CA 94244-0002
6. General Plan designation:
N/A (statewide)
7. Zoning:
N/A (statewide)
8. Description of Project:
The California Fish and Game Commission (Commission) proposes to amend Title 14 sections maintain consistency with recent statutory changes for recreational and commercial trapping. The amendments to the trapping regulations are designed to 1) provide consistency and conformity to current statutes as it is now unlawful to trap any furbearing mammal or nongame mammal for purposes of recreation or commerce in fur or sell the raw fur of any fur-bearing mammal or nongame mammal otherwise lawfully taken, and 2) make minor conforming changes to increase the clarity and consistency of these regulations.
9. Surrounding land uses and setting:
N/A
10. Other Public Agencies Whose Approval Is Required:
None.
11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.31?
On March 31, 2026, the Commission mailed a tribal notification to Native American tribes traditionally and culturally affiliated with the project area.

No tribes have requested consultation.

Environmental Factors Potentially Affected:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact” as indicated by the checklist on the following pages.

- | | | |
|--|---|---|
| ☐ Aesthetics | ☐ Agriculture and Forestry | ☐ Air Quality |
| ☐ Biological Resources | ☐ Cultural Resources | ☐ Energy |
| ☐ Geology/Soils | ☐ Greenhouse Gas Emissions | ☐ Hazards and Hazardous Materials |
| ☐ Hydrology/Water Quality | ☐ Land Use/Planning | ☐ Mineral Resources |
| ☐ Noise | ☐ Population/ Housing | ☐ Public Services |
| ☐ Recreation | ☐ Transportation | ☐ Tribal Cultural Resources |
| ☐ Utilities/Service Systems | ☐ Wildfire | ☐ Mandatory Findings of Significance |

This project will not have a “Potential Significant Impact” on any of the environmental factors listed above; therefore, no boxes are checked.

Determination:

On the basis of this initial evaluation:

- ☒ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Melissa Miller-Henson, Executive Director

Date

Responses to Initial Study Environmental Checklist

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation (LTM)	Less Than Significant Impact (LTS)	No Impact (NI)
I. Aesthetics. Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☐	NI
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	NI
c) In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☐	NI
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☐	NI
II. Agriculture and Forestry Resources. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and the forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation (LTSM)	Less Than Significant Impact (LTS)	No Impact (NI)
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	NI
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	NI
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	NI
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	NI
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	NI
III. Air Quality. Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	NI
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☐	NI
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☐	NI
d) Result in any other emissions (such as those leading to odors) affecting a substantial number of people?	☐	☐	☐	NI

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation (LTSM)	Less Than Significant Impact (LTS)	No Impact (NI)
IV. Biological Resources. Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	NI
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	NI
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	NI
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	NI
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	NI
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	NI
V. Cultural Resources. Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☐	☐	NI

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation (LTSM)	Less Than Significant Impact (LTS)	No Impact (NI)
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☐	☐	NI
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☐	NI
VI. Energy. Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operations?	☐	☐	☐	NI
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	NI
VII. Geology and Soils. Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				NI
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☐	NI
ii) Strong seismic ground shaking?	☐	☐	☐	NI
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☐	NI
iv) Landslides?	☐	☐	☐	NI
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☐	NI
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☐	NI

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation (LTSM)	Less Than Significant Impact (LTS)	No Impact (NI)
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☐	NI
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	NI
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☐	NI
VIII. Greenhouse Gas Emissions. Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☐	NI
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☐	NI
IX. Hazards and Hazardous Materials. Would the project:				
i) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☐	NI
ii) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☐	NI
iii) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	NI
iv) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	NI

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation (LTSM)	Less Than Significant Impact (LTS)	No Impact (NI)
v) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	NI
vi) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	NI
vii) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	NI
X. Hydrology and Water Quality. Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	☐	☐	☐	NI
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☐	NI
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	☐	☐	☐	NI
i) result in substantial erosion or siltation on- or off-site;	☐	☐	☐	NI
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	☐	☐	☐	NI
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of pollution runoff; or	☐	☐	☐	NI
iv) impede or redirect flood flows?	☐	☐	☐	NI

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation (LTSM)	Less Than Significant Impact (LTS)	No Impact (NI)
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	NI
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	NI
XI. Land Use and Planning. Would the project:				
a) Physically divide an established community?	☐	☐	☐	NI
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	NI
XII. Mineral Resources. Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	NI
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	NI
XIII. Noise. Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☐	NI
b) Generation of excessive ground borne vibration or ground borne noise levels?	☐	☐	☐	NI
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	NI

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation (LTSM)	Less Than Significant Impact (LTS)	No Impact (NI)
XIV. Population and Housing. Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	NI
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	NI
XV. Public Services. Would the project:				
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				NI
Fire protection?	☐	☐	☐	NI
Police protection?	☐	☐	☐	NI
Schools?	☐	☐	☐	NI
Parks?	☐	☐	☐	NI
Other public facilities?	☐	☐	☐	NI
XVI. Recreation.				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	NI
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	NI

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation (LTSM)	Less Than Significant Impact (LTS)	No Impact (NI)
XVII. Transportation. Would the project:				
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☐	NI
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☐	NI
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	NI
d) Result in inadequate emergency access?	☐	☐	☐	NI
XVIII. Tribal Cultural Resources.				
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:	☐	☐	☐	NI
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☐	☐	NI
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☐	☐	NI

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation (LTSM)	Less Than Significant Impact (LTS)	No Impact (NI)
XIX. Utilities and Service Systems. Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☐	NI
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☐	NI
c) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☐	NI
d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☐	NI
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	NI
XX. Wildfire. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	NI
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	NI

	Potentially Significant Impact (PSI)	Less Than Significant with Mitigation (LTSM)	Less Than Significant Impact (LTS)	No Impact (NI)
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment.	☐	☐	☐	NI
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	NI
XXI. Mandatory Findings of Significance.				
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☐	NI
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	☐	☐	☐	NI
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☐	NI

Explanation of Responses to Initial Study Environmental Checklist

I. Aesthetics

- a) The project will not have an adverse effect on a scenic vista. Such an impact will not occur because the project will not involve any construction, land alteration, or modification of any buildings or structures.
- b) The project will not damage scenic resources such as trees, rock outcroppings, and historic buildings. Such an impact will not occur because the project will not involve any construction, land alteration, or modification of any buildings or structures.
- c) The project will not substantially degrade, in nonurbanized areas, the existing visual character or quality of public views of the site and its surroundings. Such an impact will not occur because the project will not involve any construction, land alteration, or modification of any buildings or structures.
- d) The project will not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

II. Agriculture and Forestry Resources

- a) The project will not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program (FMMP) of the California Resources Agency, to non-agricultural use. Such an impact will not occur because the project will not involve any construction, land alteration, or land use changes.
- b) The project will not conflict with existing zoning for agricultural use or a Williamson Act contract. Such an impact will not occur because the project will not involve any construction, land alteration, or land use changes.
- c) The project will not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timber zoned Timberland Production. Such an impact will not occur because the project will not involve any construction, land alteration, or land use changes.
- d) There will be no loss of forest land, and the project will not result in the conversion of forest land to non-forest use. Such an impact will not occur because the project will not involve any construction, land alteration, or land use changes.
- e) The project will not involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use. While commercial and recreational trapping will no longer be permitted after the adoption of these regulations, the possible loss of farm animals due to depredation is offset by the owner and tenant's ability to continue to trap depredators.

III. Air Quality

- a) The project will not conflict with or obstruct implementation of the applicable air quality plan. Such an impact will not occur because the project will not involve any construction, land alteration, or land use changes.
- b) The project will not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard. Such an impact will not occur because the project involves no ongoing sources of air pollution.
- c) The project will not expose sensitive receptors to substantial pollutant concentrations. Such an impact will not occur because the project will not increase pollutant concentrations.
- d) The project will not create objectionable odors affecting a substantial number of people.

IV. Biological Resources

- a) The project will not have an adverse effect, either directly or through habitat modifications, on certain species identified as candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife, National Marine Fisheries Service (NMFS), or U.S. Fish and Wildlife Service (USFWS).
- b) The project will not have an adverse effect on any riparian habitat or other sensitive natural communities identified in local or regional plans, policies and regulations, or by the California Department of Fish and Wildlife or the USFWS. Such an impact will not occur because the project will not involve any construction, land alteration, or land use changes.
- c) The project will not have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means. Such an impact will not occur because the project will not involve any construction, land alteration, or land use changes.
- d) The project will not substantially interfere with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. Such an impact will not occur because the project will not involve any construction, land alteration, or land use changes.
- e) The implementation of the regulations will not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?
- f) The project will not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat

conservation plan. Such an impact will not occur because the project will not involve any construction, land alteration, or land use changes.

V. Cultural Resources

- a) The project will not cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5. The project does not involve ground disturbing work or work permanently modifying any existing structure or resource and thus has no potential to affect historical resources.
- b) The project will not cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5. The project does not involve ground disturbing work and thus has no potential to affect archaeological resources.
- c) The project will not disturb any human remains, including those interred outside of formal cemeteries. The project does not involve ground disturbing work and thus has no potential to affect human remains.

VI. Energy

- a) The project would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operations. Such an impact will not occur because the project will not use energy resources.
- b) The project will not affect nor obstruct any state or local plan for renewable energy or energy efficiency.

VII. Geology and Soils

- a.i) The project will not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area, or based on other substantial evidence of a known fault. Such an impact will not occur because the project will not create any structures for human habitation.
- a.ii) The project will not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking. Such an impact will not occur because the project will not create any structures for human habitation.
- a.iii) The project will not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction. Such an impact will not occur because the project will not create any structures for human habitation.

- a.iv) The project will not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. Such an impact will not occur because the project will not create any structures for human habitation.
- b) The project will not result in substantial soil erosion or the loss of topsoil. Such an impact will not occur because the project will not involve ground disturbing work.
- c) The project will not be located on a geologic unit or soil that is unstable, or that would become unstable and potentially result in on- or off-site landslides, lateral spreading, subsidence, liquefaction, or collapse. Such an impact will not occur because the project will not involve ground disturbing work.
- d) The project will not be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property. Such an impact will not occur because the project will not involve ground disturbing work.
- e) The project will not create any sources of wastewater requiring a septic system.
- f) The project will not indirectly destroy a unique paleontological resource or site or unique geologic feature.

VIII. Greenhouse Gas Emissions

- a) The project will not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment. The project will not involve construction, land alteration, or land use changes.
- b) The project will not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases. The project would result in the production of very low greenhouse gas emissions.

IX. Hazards and Hazardous Materials

- a) The project will not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. The project will not involve the transport, use, or disposal of hazardous materials.
- b) The project will not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. The project will not involve the transport, use, or disposal of hazardous materials.
- c) The project will not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. The project will not involve the transport, use, or emission of any hazardous materials.
- d) The project will not be located on any site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.

- e) The project will not be located within an airport land use plan area.
- f) The project will not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan. The project will not involve any construction, land alteration, or land use changes.
- g) The project will not expose people or structures to a significant risk of loss, injury, or death involving wildland fires. The project will not involve any construction, land alteration, or land use changes.

X. Hydrology and Water Quality

- a) The project will not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. The project will not involve any construction, land alteration, water use, or water discharge.
- b) The project will not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. The project will not involve any construction, land alteration, or groundwater use.
- c.i) The project will not substantially alter the existing drainage pattern of the site or area including through the alteration of the course of a stream or river or through the addition of impervious surfaces in a manner which would result in substantial erosion or siltation on- or off-site because the project will not involve any construction or land alteration.
- c.ii) The project will not substantially alter the existing drainage pattern of the site or area including through the alteration of the course of a stream or river or through the addition of impervious surfaces in a manner which would result in flooding on- or off-site because the project will not involve any construction or land alteration.
- c.iii) The project will not create or contribute runoff water that would exceed the capacity of existing or planned storm-water drainage systems, or provide substantial additional sources of polluted runoff because the project will not involve any construction or land alteration.
- c.iv) The project will not impede or redirect flood flows because the project will not involve any construction or land alteration.
- d) In flood hazard, tsunami, or seiche zones, the project would not risk release of pollutants due to project inundation because the project would not involve any construction or land alteration.
- e) The project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. The project will not involve any construction, land alteration, or groundwater use.

XI. Land Use and Planning

- a) The project will not physically divide an established community. The project will not involve any construction, land alteration, or land use changes.
- b) The project will not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. The project will not involve any construction, land alteration, or land use changes.

XII. Mineral Resources

- a) The project will not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state. Such an impact will not occur because the project will not involve any construction, land alteration, or land use changes.
- b) The project will not result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. Such an impact will not occur because the project will not involve any construction, land alteration, or land use changes.

XIII. Noise

- a) The project will not result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. The project will not involve construction or physical alteration of land, and its implementation will not generate noise levels in excess of agency standards.
- b) The project will not result in generation of excessive ground-borne vibration or ground-borne noise levels. The project will not involve construction or physical alteration of land.
- c) The project will not be located within the vicinity of a private airstrip, or an airport use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport.

XIV. Population and Housing

- a) The project will not induce substantial unplanned population growth in an area, either directly or indirectly. Such an impact will not occur because the project will not construct any new homes, businesses, roads, or other human infrastructure.
- b) The project will not displace any existing people or housing and will not necessitate the construction of replacement housing elsewhere.

XV. Public Service

- a) The project will not have any significant environmental impacts associated with new or physically altered governmental facilities. The project will not involve any construction, land alteration, or land use changes.

XVI. Recreation

- a) The project will not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or would be accelerated.
- b) The project does not require construction or expansion of recreational facilities.

XVII. Transportation

- a) The project will not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. The project involves no land use or transportation system modifications.
- b) The project will not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b), which pertains to vehicle miles traveled.
- c) The project will not increase hazards due to a geometric design feature or incompatible uses with equipment. There will be no land use or transportation system modifications.
- d) The project will not result in inadequate emergency access. The project involves no land use or transportation system modifications.

XVIII. Tribal Cultural Resources

- a.i) The project would not cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe. Furthermore,
- a.ii) The project will not cause a substantial adverse change in the significance of a tribal cultural resource that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k). The project does not involve ground disturbing work and thus has no potential to affect tribal cultural resources.
- a.iii) The project will not cause a substantial adverse change in the significance of a tribal cultural resource that is determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. The project does not involve ground disturbing work and thus has no potential to affect tribal cultural resources.

XIX. Utilities and Service Systems

- a) The project will not require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunication facilities. The project does not involve construction or land alteration.
- b) The project requires no new water supplies.
- c) The project will not produce wastewater.
- d) The project will not generate solid waste. Thus, the project will be in compliance with state and local standards for solid waste.
- e) The project will not create solid waste. Thus, the project will be in compliance with federal, state, and local management and reduction statutes and regulations related to solid waste.

XX. Wildfire

- a) The project will not impair an adopted emergency response plan or emergency evacuation plan.
- b) The project will not exacerbate wildfire risks due to slope, prevailing winds, and other factors.
- c) The project will not require the installation or maintenance of any infrastructure.
- d) The project will not expose people or structures to significant risks, including downslope or downstream flooding or landslides as a result of runoff, post-fire slope instability, or drainage changes.

XXI. Mandatory Findings of Significance

- a) The project does not have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory. The project is consistent with the Department's mission to manage California's diverse wildlife resources for their ecological value, and their use for the public's enjoyment.
- b) The project does not have adverse impacts that are individually limited, but cumulatively considerable. Cumulative adverse impacts will not occur because there are no potential adverse impacts due to project implementation in any impact analyses.
- c) The project does not have environmental effects that will cause substantial adverse effects on humans, either directly or indirectly. The project will not involve any construction, land alteration, or the creation of new infrastructure.



WILDLIFE CARE OF SOUTHERN CALIFORNIA

Rescue - Rehabilitate - Release

P.O Box 941476 Simi Valley Ca 93065

wildlifecareofsocal.org Wildlife Care of Southern California/Facebook

To the California Department of Fish and Wildlife
and the California Fish and Game Commission:

Subject: Request to Amend Wildlife Rehabilitation Permit or Issue Separate
Authorization

Wildlife Care of Southern California respectfully requests that its Wildlife Rehabilitation Permit be amended—or, alternatively, that a separate written authorization be issued—to allow trained individuals operating under the permit to use humane live-capture equipment for specifically identified coyotes and bobcats that are visibly injured or diseased, when capture is necessary to provide rehabilitation or veterinary care.

Section 679.3(a) provides that the Department may amend existing permits by adding conditions it determines to be necessary.

Section 679.3(a)(1), however, clarifies that a rehabilitation permit does not supersede other laws or eliminate the need for any other applicable permit, license, or authorization.

We ask CDFW to tell us whether it can issue a specie specific permit conditioner a separate written authorization for this purpose, and if so how we apply.

This authorization would be narrowly limited. It would not extend to:

- nuisance-wildlife removal;
- the relocation of healthy wildlife;
- depredation-related activities; or
- general wildlife capture or handling.

The need for a clearly defined authorization process was highlighted by the recent

“*Wendy Studio City Coyote case*”.

For approximately one year, this coyote lived with two pellets lodged in her head and severe progressive infection involving the left side of her and sinuses. The infection ultimately destroyed much one her jawbone on the affected side, leaving her unable to eat a normal diet causing chronic pain and suffering, she survived because of the compassionate community members providing her with soft food and water. The Studio City community was desperately reaching out for help to all agencies, Wildlife Care of Southern California was aware of her condition and had the experience, equipment and resources necessary to help, however we were legally restricted from trapping her.

Section 679.2(a)(4) permits the transport of an injured mammal that has been “lawfully trapped,” but it does not establish a process through which a permitted wildlife rehabilitator may lawfully capture that animal when capture is necessary to provide care.

This creates a regulatory gap: the regulations contemplate the transport of a lawfully captured injured animal without clearly explaining how a qualified rehabilitator may lawfully perform the initial capture. This gap is especially consequential for injured urban wild animals.

We therefore respectfully ask CDFW to clarify whether Section 679.3(a) may be used to add this authority as a condition of a rehabilitation permit. If the Department determines that a permit amendment is not the appropriate mechanism,

Wildlife Care of Southern California requests that CDFW establish a separate written authorization or species-specific protocol for this limited purpose.

Permitted wildlife rehabilitators who specialize in particular species often possess qualifications equal to—and in many cases exceeding—those required of commercial wildlife trappers. These qualifications may include decades of species-specific experience in animal behavior, humane capture and restraint, injury assessment, transport stabilization, and medical care. Such knowledge and skills are essential and required to obtaining and maintaining a wildlife rehabilitation permit issued by the Department.

Commercial wildlife trappers are generally authorized to charge for capturing wildlife, often in response to alleged nuisance or depredation concerns. By contrast, qualified wildlife

rehabilitators provide their services without compensation and work specifically to assist injured or diseased animals that require immediate intervention. Nevertheless, rehabilitators currently lack a clearly defined process for obtaining authorization to capture an injured animal when capture is necessary for treatment.

Establishing a formal protocol would help prevent delays in veterinary care, unnecessary suffering, inappropriate handling, and uncertainty regarding lawful capture. It would also ensure that any capture is conducted only by qualified personnel, using humane equipment and procedures, for a clearly documented rehabilitation purpose.

Respectfully
Anna Reams
Director, Wildlife Care of Southern California

From: Anna Reams [REDACTED]
Sent: Saturday, September 19, 2026 3:51 PM
To: FGC
Cc: Wildlife WHL Rehab
Subject: Public Comment-Mammal Trapping Consistency with Statute / Bobcats

Dear Commissioners, 9-17-2026

Public Comment- Mammal Trapping Consistency with Statute

On behalf of Wildlife Care of Southern California, I am writing regarding the proposed regulation changes titled "Mammal Trapping Consistency with Statute." We support the proposed amendment to Section 478 requiring an injured, diseased, or orphaned bobcat caught incidentally during an otherwise lawful trapping action to be transferred to a permitted rehabilitator.

However, the proposed Language exposes a continuing gap in California's regulations. It addresses what happens after an injured bobcat has been trapped "Incidentally"; it does not establish who may perform a rescue capture when an injured or diseased animal remains mobile in the field, and no lawful trapping action is underway.

Permitted wildlife rehabilitators regularly receive calls about injured, mobile Coyotes, Bobcats, foxes, and other mammals that animal control agencies cannot catch by hand or net. Although qualified rehabilitators may be able to possess, transport, treat, and rehabilitate these animals, they lack a clear process for obtaining timely authorization to use an appropriate humane trap to bring the animal into care.

The proposed Bobcat provision already recognizes that injured trapped wildlife should be transferred to a qualified rehabilitator. The regulation should also provide a lawful, practical means for that lifesaving intervention when trapping is necessary solely for rescue.

The gap is demonstrated by the case of Wendy, an injured coyote in Studio City, who traveled around with a severe facial injury and infection for 1 year. Which we have sent numerous letters to the commission on. The community reached out for a year trying to get a response from authorities.

This organization gets many calls on Bobcats with mange that have to be caught, or they will die. We have the resources; we just need a clear process to help them. It makes no sense that a depredation permit can be obtained by someone with no experience and the permitted facilities by the department can't get permission to trap a sick animal.

We respectfully request that the Commission use this rulemaking opportunity to establish a case-by-case authorization process that allows appropriately permitted and qualified wildlife rehabilitators to humanely trap an injured, diseased mammal for rehabilitation.

Anna Reams
Director,
Wildlife Care of Southern California

Anna Marie Reams
Director,
Wildlife Care of SoCal
www.wildlifecareofsoal.org
<https://wildlifecareofventura.org/donate/>
Wildlife Care of Southern California/Facebook
Formerly (Wildlife Care of Ventura County)
City of Simi Valley, State, Federal and USDA permits