



May 12, 2025

President Erika Zavaleta  
 Commissioner Darius Anderson  
 California Fish and Game Commission  
 Wildlife Resources Committee  
 P.O. Box 944209  
 Sacramento, CA 94244-2090

**RE: Opposition to Agenda Item 4 – Potential Recommendations for Changes to Regulations Regarding Take of Coyotes**

Dear President Zavaleta and Commissioner Anderson:

Under item 4 on the Wildlife Resources Committee (WRC) May 15, 2025, meeting agenda, the WRC will discuss potential recommendations for changes to regulations regarding the take of coyotes. The undersigned wildlife conservation organizations must strongly oppose this recommendation due to the following reasons:

**I. Lack of Credible Science**

There is no credible scientific evidence warranting the extension of game species-level protections to coyotes. Current coyote management practices are consistent with the best available science and follow well-established regulatory frameworks that aim to balance wildlife conservation with public interests.

Coyotes (*Canis latrans*) are not considered endangered or threatened. In fact, the International Union for Conservation of Nature (IUCN) classifies them as a species of “Least Concern.” In 2013, the California Department of Fish and Wildlife (Department) and other agencies estimated the statewide coyote population to be at around 250,000. Today, assessments by the same agencies suggest their populations may be as high as 750,000.

Coyotes are found in two distinct population groups – wild versus habituated. Wild coyotes are naturally afraid of humans and, according to the Department, respond to the various hazing methods. By comparison, habituated coyotes found in urban areas are desensitized from birth not to fear humans. They are taught by their parents how to navigate and hunt within an urban setting. In addition, they are fed, medicated, housed, and protected – often illegally – by individuals and organizations. This behavior has led to growing problems including significantly increased human-wildlife conflicts, livestock and pet losses, threats to food security, and the decline of other sensitive species.

Over a decade ago, the defining concern in the coyote debate was their potential threat to human safety. Since then, that concern has become a stark reality. Every week, new videos emerge showing coyotes walking city streets and entering suburban backyards – often in neighborhoods far removed from wilderness areas where coyotes have not been seen for generations. Today, attacks are happening at all times of day across the state – including children at the beach, hikers and joggers on trails, individuals on urban streets, and even those inside their own homes have been targeted.

Considering recent documented fatal encounters with predatory wildlife in California, it is distinctly clear that public safety must be treated as a core priority in wildlife management policy. Conservation must remain a vital goal, but it must not override the fundamental duty to protect human life and community well-being. Ensuring that effective, science-based management strategies are in place is essential to preventing future tragedies involving people, as well as their domestic pets, and livestock. Imposing unreasonable or unnecessary restrictions on coyote management would only heighten an already unacceptable public safety risk.

## **II. Additional Department Staff/Expense to Issue Depredation Permits**

Although Commission outreach on this topic states that “WRC is not proposing new regulations related to coyote depredation...,” they are, in fact, doing just that.

Under the existing 14 C.C.R. §472, coyotes can be taken at any time with a hunting license, to protect public safety, or under depredation – should they be threatening one’s pets, livestock or agricultural crops. Most will agree that coyotes are a threat to human safety and domestic animals. However, because current regulations allow for the take of coyotes – in any number, and at any time – with a hunting license, the Department currently does not issue depredation permits for their removal.

Should the Commission move forward with changes to regulations regarding the take of coyotes, the Department would have to commence issuing large numbers of depredation permits for the removal of problem coyotes. Without staff doing so currently, this change would require the addition of staff and come at considerable expense to the Department.

## **III. Significant Additional Workload on Commission and Department Staff**

Fish and Game Commission staff have already engaged with several stakeholders to seek input on which priorities should guide the Commission’s efforts, given that the current workload far exceeds the available staff capacity. Unlike most issues that come before the Commission, coyote management affects a broad cross-section of Californians, including city governments, farmers, ranchers, hunters, and animal-interest groups. The merits of arguments presented by those who support, and those who oppose, possible changes to regulations regarding take of coyotes aside – it is crucial WRC carefully consider the significant time, resources, and effort this highly controversial issue would demand from

the Commission and staff, prior to advancing any recommendation to the full Commission.

#### **IV. Lack of Urgency**

There is no impending natural resource calamity or even an isolated high-profile incident that has necessitated that the topic of possible changes to coyote take recommendations be brought forward for consideration. Nearly all matters brought before the Commission demand urgent action to protect vulnerable resources or are time-sensitive due to approaching harvest seasons. Introducing an unnecessary rulemaking process on such a contentious issue would only divert limited time and capacity from far more pressing priorities—those with immediate consequences for California’s natural resources and the public interest.

Finally, it must be noted that if this topic had been brought forward to the Commission via the traditional petition route, it surely would have been referred to the Department for their review and recommendation. After their review, had the Department recommended that the topic not go to rulemaking, the Commission would almost assuredly have denied the petition.

Based on comments made during the January WRC meeting, as well as additional remarks made since then, it appears the Department does not support any changes to the current regulations governing the take of coyotes. In keeping with established Commission procedures, we believe the Department should be formally asked to state its position on this matter—either prior to or during the WRC meeting—and that their response should carry significant weight in the Commission’s decision-making process.

For all the above reasons, we respectfully urge WRC to not make a recommendation to the full Commission to move forward with a rulemaking on possible changes to current coyote take regulations. The absence of credible scientific justification, the significant additional expense it would place upon the Department, the undue extra burden on already overextended Commission and Department staff, and the lack of any urgency surrounding this issue make it an ill-timed and misplaced use of limited resources. We encourage the WRC and the full Commission to reject this proposal and maintain its focus on matters of genuine conservation importance and public need.

Thank you for your consideration of our concerns and for your continued commitment to science-based wildlife policy.

Respectfully,

Ryan Bronson, Director of Government Affairs  
Rocky Mountain Elk Foundation

Don Martin, President  
California Chapter – Wild Sheep Foundation

Lori Jacobs, President  
California Houndsmen for Conservation

Marten Benatar, President  
California Hawking Club

Chris Hall, Chief Executive Officer  
California Deer Association

Charles Whitwam, Founder and President  
HOWL for Wildlife

Fred Harpster, President  
Black Brant Group

Lisa C. McNamee, Legislative Coordinator  
California Chapters – Safari Club International

Steve Miller, President  
Tulare Basin Wetlands Association

Gary F. Brennan, President  
San Diego County Wildlife Federation

Loyal Taylor, President  
Cal-Ore Wetland and Waterfowl Council

David Bess, California Legislative Chair  
Backcountry Hunters & Anglers

James Stone, President  
Nor-Cal Guides & Sportsmen's Association

Rick Travis, Legislative Director  
California Rifle & Pistol Association

Ken Akins, President  
Sacramento Safari Club

Mark Hennelly, V.P. of Government Relations  
California Waterfowl Association

Robert Williams, President  
San Diego County Varmint Callers

Glennon T. Gingo, President  
Mzuri Safari Club

Bob Keagy, President  
Golden Gate Chapter – Safari Club International

Clark Smith, President  
San Francisco Bay Area Chapter - Safari Club International

Chriss Bowles, President  
California Bowmen Hunters/State Archery Association

cc: Members, California Fish and Game Commission  
Ms. Melissa Miller-Henson, Executive Director, California Fish and Game Commission  
Mr. Chuck Bonham, Director, California Department of Fish and Wildlife