May 2, 2025

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

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

President Zavaleta and Fish and Game Commissioners,

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

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

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

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

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

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

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

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

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

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

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

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

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

Sincerely,

California Farm Bureau
Rural Counties Representatives of California
California Woolgrowers Association
Alameda County Farm Bureau
Amador County Farm Bureau
Butte County Farm Bureau
Calaveras County Farm Bureau
Colusa County Farm Bureau
Del Norte County Farm Bureau
El Dorado County Farm Bureau
Fresno County Farm Bureau
Glenn County Farm Bureau
Humboldt County Farm Bureau
Inyo-Mono County Farm Bureau
Lake County Farm Bureau
Marin County Farm Bureau
Modoc County Farm Bureau
Monterey County Farm Bureau
Napa County Farm Bureau
Nevada County Farm Bureau
Placer County Farm Bureau
Plumas-Sierra County Farm Bureau
Sacramento County Farm Bureau

San Benito County Farm Bureau
Shasta County Farm Bureau
Siskiyou County Farm Bureau
Solano County Farm Bureau
Stanislaus County Farm Bureau
Tehama County Farm Bureau
Trinity County Farm Bureau
Tulare County Farm Bureau
Tuolumne County Farm Bureau
Yolo County Farm Bureau
Yuba-Sutter County Farm Bureau