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MODOC COUNTY
FISH, GAME & RECREATION COMMISSION
202 W 4TH STREET
ALTURAS, CA 96101

April 15, 2014

To: Wildlife Resources Committee Predator Task Force

Re: Response to "Initial comments and proposed amendments to the California Fish and Game Code sections and Regulations regarding the State's responsibilities pertaining to predator management, conservation, and stewardship" submitted by Project Coyote on November 11, 2013

Dear Sirs:

On behalf of the residents of Modoc County, the Modoc County Fish, Game and Recreation Commission and Modoc County Board of Supervisors submits the following comments to address any proposed amendments to predator management as it pertains to coyotes.

Fish and Game Code 1801 provides that wildlife resources under the jurisdiction and influence of the State should be conserved for the benefit of all citizens of California, as well as to maintain their intrinsic and ecological value. To conserve is to "use or manage wisely, preserve, save." To preserve is to "keep alive or in existence; make lasting." Over the last two centuries the range of the coyote has quadrupled to cover most of the entire continent of North America. This is due directly to the influence of settlers hunting wolves in much of the United States. Due to their ability to enter estrus early and have larger litters to meet the carrying capacity of their environment, and their varied diet, the coyote moved into the niche vacated by the wolves. Coyotes have in fact "flourished in part by exploiting the changes that people have made to the environment, and their opportunism goes back thousand of years."¹ In the last few decades, the coyote has moved into suburban environments due to the ample food supply to be found there, including pets, pet food, and garbage. Many of the highest population densities on record are found in Southern California.² As it is the duty of the Department to keep the species alive or in existence, all we have to do is to continue what we have been doing. As one of the least protected species in the United States that has no hunting season or bag limit, the coyote doesn't need any protection because it is thriving.

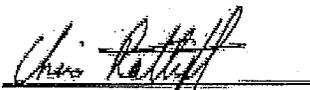
The Department's current predator policy states that in the event that a mammal may cause injury or damage to private property, depredation control methods directed towards the offending animals may be implemented. Opponents to coyote control measures say that indiscriminate killing does not target the single offending animal. While coyotes are often found living solitary lives or with a mate, in rural areas where food is abundant in the form of livestock, they are often found in groups of up to ten individuals. Also, parents hunt with adolescents to teach them.

Targeting a single offending individual coyote in rural California is next to impossible. Because livestock are easy prey, coyotes learn to kill them repeatedly and often kill more than they will consume.² According to data released by the National Agricultural Statistics Service of the USDA, in 2010, California's coyotes caused the majority of cattle and calf predator losses accounting for 57%. Over 2% of the entire lamb crops in the Pacific region States were killed by coyotes. Coyotes were responsible for 73.4% of all predator caused sheep and lamb deaths in the Pacific region according to the latest statistics.³ This adds up to millions of dollars in losses to California livestock producers. Damage and stress caused by coyotes adds additional monetary losses in the form of veterinarian bills, weight loss, lowered fertility, etc....

Generally, coyotes are seldom seen and avoid human contact. This may be in response to hunting and trapping by humans since we settled the west. Throughout much of the twentieth century coyotes were killed using toxicants, traps, shooting, and other methods.² Today live traps and shooting are the only legal lethal means of control. Without government predator control agents and individual hunters, livestock producers in Modoc County would sustain much greater losses putting their livelihoods at risk. While contests that encourage hunters to help control the coyote numbers may seem cruel to some, to the producers it is a welcome relief. Many rural economies are dependant upon it. We disagree with Project Coyote and their assessment that, "indiscriminate killing of predators is not only ineffective but is often counterproductive..." or that "indiscriminate takings... appear to have no justifiable basis in... economics." According to the Humane Society of the United States, "Despite bounties and large-scale efforts to kill coyotes over the last 100 years, coyotes have in fact expanded their range throughout the U.S. and Canada tremendously. One study even found that killing 75% of a coyote population every year for 50 years would still not exterminate the population."⁴ These numbers are necessary just to "control" a population. "As regulations on predator control tools and materials increased and society's attitudes toward predators changed, it has become increasingly difficult to control coyote numbers or slow their range expansion into new areas."² Another financial drain for Modoc County is coyote predation of pronghorn and mule deer fawns. Coyotes are the main predator of pronghorn fawns and their removal conducted over large areas increases fawn survival and the abundance of pronghorn.⁵ Coyote predation accounted for 79% of early fawn mortality of mule deer.⁶ Hunting tourism is a large part of our economy.

As citizens of Modoc County, we appreciate all aspects of the nature that surrounds us. We are not in favor of exterminating the coyote, only in controlling the population with the few methods available to us. There is little doubt that they outnumber the residents of our county, and we will continue to live with them. As the Humane Society of the United States said, "Coyotes are here to stay."

Respectfully,



Chris Ratliff, Chairman
Modoc County Fish, Game
& Recreation Commission



Jim Wills, Chairman
Modoc County Board of Supervisors