

PROJECT COYOTE

F O S T E R I N G C O E X I S T E N C E



To: California Fish & Game Commission

From: Camilla Fox, Project Coyote Executive Director & Dr. Robert Crabtree, Project Coyote Science Advisory Board

Re: Wildlife Killing Contests & unregulated take of predators

Date: April 2, 2014

California Fish & Game Commission Executive Director Sonke Mastrup asked that I clarify what Project Coyote is requesting with regard to wildlife killing contests and concerns that we have shared with the Commission specific to the take of predators. I'm attaching a letter that I submitted on March 4th regarding this issue and providing further clarification below.

RE: WILDLIFE KILLING CONTESTS

Regarding wildlife killing contests we are requesting that the Commission promulgate regulatory language that reflects the intent of Section 2003 of the California code and that ensures against the mass killing of wildlife as part of a contest, tournament or derby. This code was created in the early 1990s specifically to end the mass killing of wildlife and was written to cover **all** mammals as it was recognized that many species from big game to predators were killed for prizes and other inducements. That section reads:

"Except as specified in subdivisions (b), (c), and (d), it is unlawful to offer any prize or other inducement as a reward for the taking of any game birds, mammals, fish, reptiles, or amphibians in an individual contest, tournament, or derby." (full section below)

The intent is clear.

Sections b and c exempt frog-jumping and fish contests. We are not suggesting these be changed. Section (d) provides a gaping loophole. This section states: "This section does not apply to any person conducting an individual contest, tournament, or derby for the taking of game birds and mammals, if the total value of all prizes or other inducements is less than five hundred dollars (\$500) for the individual contest, tournament, or derby."

This loophole contravenes the intent of section 2003 which is to eliminate **any** prize or other inducement as a reward for the taking of wildlife. We urge you to use your broad

authority to regulate and restrict take by initiating a rulemaking process to make it unlawful to offer any prize or other inducement as a reward for the taking of any mammals and that ensures against the mass killing of wildlife as part of a contest, tournament or derby.

RE: UNLIMITED TAKE OF PREDATORS

As expressed in previous comments (attached) and in testimony we are also asking the Commission to regulate and restrict take of predators- both bag and possession limits as well as allowable methods of take. Currently many species of predators in California are unregulated and can be taken in unlimited numbers any time of the year including coyotes and foxes to name only two. Moreover, many of the take methods allowed essentially sanction animal cruelty as outlined in our letter of March 4th with accompanying attachments showing coyotes and other animals being ripped apart by dogs (please see attachment). State law and regulation currently allow this practice. You have the authority to restrict this blatant animal cruelty and we urge you to do so. There is no justification for such unlimited take and wanton waste of wildlife; because of this classification there is virtually no monitoring by the state of these predator species and the cruelty revealed on websites and list serves of “varmint hunting” groups would be considered unconscionably cruel and unacceptable by most Californians. There is also no sound scientific justification for this kind of mismanagement of wildlife. Setting scientifically defensible bag and possession limits and restricting methods that contravene ecologically sound management and ethical protocols of wildlife management is inline with the Commission’s aim of modernizing predator management in California.

We are asking that the Commission consider limiting take of predators (using the definition of predator as developed by the WRC predator policy working group with input from DFW staff) and restricting methods of take that clearly contravene ecologically sound management and ethical protocols of wildlife management.

Thank you.

2003.

(a) Except as specified in subdivisions (b), (c), and (d), it is unlawful to offer any prize or other inducement as a reward for the taking of any game birds, mammals, fish, reptiles, or amphibians in an individual contest, tournament, or derby.

(b) The department may issue a permit to any person authorizing that person to offer a prize or other inducement as a reward for the taking of any game fish, as defined by the commission by regulation, if it finds that there would be no detriment to the resource.

The permit is subject to regulations adopted by the commission. The application for the permit shall be accompanied by a fee in the amount determined by the department as necessary to cover the reasonable administrative costs incurred by the department in issuing the permit. However, the department may waive the permit fee if the contest, tournament, or derby is for persons under the age of 16 years, or who are physically or mentally challenged, the primary purpose of the contest, tournament, or derby is to introduce young anglers to, or educate them about fishing. All permits for which the fee is waived pursuant to this subdivision shall comply with all other requirements set forth in this section.

(c) This section does not apply to any person conducting what are generally known as frog-jumping contests or fish contests conducted in waters of the Pacific Ocean.

(d) This section does not apply to any person conducting an individual contest, tournament, or derby for the taking of game birds and mammals, if the total value of all prizes or other inducements is less than five hundred dollars (\$500) for the individual contest, tournament, or derby.