

From: [REDACTED]
To: [FGC](#)
Subject: SDCWF Inputs to Wildlife Resources Committee
Date: Thursday, February 27, 2014 10:43:28 AM
Attachments: [SDCWF Predator Comments.xls](#)

Dear F&GC Staff,

Attached please find input from the San Diego County Wildlife Federation on the deliberations of its Predator Policy Subcommittee. We have attempted to follow the format used by your staff to summarize comments from other organizations. We have also, at the suggestion of the Subcommittee chairman Mr. Malstrup, color-coded our comments to indicate which issues we consider serious (red), requiring further discussion (orange), or minor (green). I hope this is helpful.

Of course, there is much more we have to say about the proposed Code and Regulation changes, but placing them in a spreadsheet format is not possible. We look forward to discussing these issues in depth at the 7 May WRC meeting. In addition, if any meeting of the Predator Policy Subcommittee is scheduled before 7 May, we would appreciate a prompt notice of that meeting.

Please forward this to whoever is responsible for incorporating our suggestions in the existing spreadsheet. I would also appreciate a response from you that this has been delivered to the appropriate person, who that person is, and a direct e-mail address for that person.

Regards,
Robert Smith
President, San Diego County Wildlife Federation

EXISTING F&G CODE (Statutory)

**SDCWF
Recommendations**

**SDCWF
Questions & Comments**

2003 - Possession and Take General

Keep subsections (c) and (d) as is.

(1) The coyote population is out of control and many attacks on domestic and wild animals, and even humans, are being reported. Any legal effort to take more coyotes should be encouraged by F&GC until their population is in balance with nature.
(2) This change would not accomplish its goal and would have unintended consequences. The elimination of prizes will not deter group hunting. This change would prohibit other activities such as local "biggest buck" contests.

4000 - Trapping of Fur-Bearing Mammals

Concur with other comments

4002 - Trapping of Fur-Bearing Mammals

Concur with using phrase "legal trap"

(1) Use of dogs should be discussed
(2) F&GC should list legal poisons, not prohibited poisons, to prevent use of a new product which could be dangerous to other wildlife

4003 - Trapping of Fur-Bearing Mammals

Concur with removing subsection; it is implicit in previous subsection

4004 - Trapping of Fur-Bearing Mammals

Changing visits to "24 hour period" places an unreasonable burden on trappers who may have minor schedule variations between days

Agree that any code should be made consistent with existing law

4152 - Nongame Mammals	(1) See recommendation on section 4004 above	(1) Agree that names of species be clarified (2) Moving this section to 4181 might result in requiring a permit for the owner activities authorized by 4152; was this the intent of F&GC?
4153 - Nongame Mammals		Would the requirement for a "finding" result in long delays in responding to problems?
4154 - Nongame Mammals		
4181 - Depredators		Concur with clarifying all species to which this section applies
4181.1 - Depredators	Transfer of carcasses should not be limited to non-profits; if no non-profit wants it, this could result in the waste of game meat. Recommend deleting all language after "shall make use of the carcass"	
4185 - Depredators		This needs further discussion; would requirement for culvert traps impact the effectiveness of the bear control efforts?
4190 - Depredators		(1) The existing code provides a useful tracking/management tool for DFW without undue harm to the bears

EXISTING TITLE 14 REGULATIONS

**SDCWF
Recommendations**

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265 - Use of Dogs for Pursuit/Take of Mammals

This section relates only to mammals. Any change to extend this beyond mammals does not belong in this section. E.g., the proposed changes to Sec. (b) and (b)(1) would make it illegal to shoot birds when training upland game dogs.

365 - Bear

If the intent is to prohibit baiting, sections relating to those species should be changed, not Section 265 which relates only to bear

Baiting is a necessary part of trapping and for predator control by ranchers. If baiting is to be prohibited, it must be done species by species.

366 - Archery Bear Hunting

Sec. (d) should read "The use of dogs is prohibited for archery bear hunting".

401 - Permit to Take Animals Causing Damage

HSUS Recommendation implies animals must be caught in the act of causing damage. This may make sense for an initial permit but not for renewal of a permit where damage occurred during the permit period but the suspected animal was not caught in the act.

461 - Badger and Gray Fox

Use of hounds for pursuit of mammals in part of our hunting heritage. This activity should only be curtailed when there is scientific data that it threatens a sustainable population of the animals cited in Sections 461-464

462 - Muskrat and Mink

464 - Raccoon

DFW should explain why an earlier season was established for Imperial County, etc. If the reason no longer applies, concur with HSUS recommendation

472 - General Provisions

(1) DFW should monitor populations of all animals listed in Sections 461-464, 472 & 478. Take limits should only be changed when scientific analyses indicate that current take limits are jeopardizing a balanced, sustainable population of that species.
(2) the proposed changes in language ignore the indirect effects of overpopulation, such as moving into urban regions, attacking pets and people, etc. Controlling populations in rural areas relieves the pressure on animals to move into urban areas, attack livestock, and prey on game species.
(3) the so-called "mass indiscriminate killing" alluded to is an indication of how severe the overpopulation of coyotes has become.

475 - Methods of Take for Nongame Birds and Nongame Mammals

(1) electronic calls are effective and thus help control the population of the species listed.
(2) it is more humane to track down a trapped animal than let it die a slow death from starvation.

478 - Bobcat

no rationale is presented for curtailing bobcat hunting and trapping, other than it is deemed "not justified"

478.1 - Bobcat Hunting Tags

480 - Bobcat Depredation

this should be re-worded to define what "deprecating" means in this case. In any case, the regulations should be the same as for coyotes.