



CALIFORNIA FARM BUREAU FEDERATION

GOVERNMENTAL AFFAIRS DIVISION

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December 29, 2014

Mr. Michael Sutton, President
California Fish and Game Commission
1416 9th Street, Room 1320
Sacramento, CA 95814

RE: Wildlife Resources Committee Agenda Item 3: Update and Discussion of Possible Changes to Predator Management Policies/Regulations, Structural Integrity Issues (Sections 460, 465.5, and 472, Title 14, CCR)

Dear Mr. Sutton:

The California Farm Bureau Federation (Farm Bureau) is writing to provide input into the ongoing discussions surrounding predator management in California. Farm Bureau represents more than 57,000 members as it 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. California's farmers and ranchers see significant annual losses to predators and other wildlife and utilize a wide range of tools to limit this damage. Farm Bureau members often rely on wildlife damage control experts to assist in controlling problem wildlife. It is important that farmers and ranchers continue to have a wide range of tools available to protect their livestock and crops from damage and it is with this in mind that Farm Bureau submits these comments on the continued discussion of California's predator management policies.

Farm Bureau previously submitted comments¹ on the myriad changes the Humane Society of the United States and Project Coyote recommended to the statutes, regulations, and policies governing predator management in California. These comments will be focused on the regulatory changes classified as addressing the structural integrity of current predator management regulations as well as recent discussions by the Fish and Game Commission (Commission) on possible changes to coyote management.

California Code of Regulations Title 14

Title 14 §472

Farm Bureau does not believe there is a need to amend Section 472 of Title 14. In regards to the taking of English sparrows and starlings, the Legislature clearly provided authority to landowners or lessees or their agents to take these species at any time². Both bird species are non-native and cause damage, both to agricultural crops and to native wildlife, and control of both species should not be limited.

¹ Dated July 7, 2014

² Fish and Game Code Section 3801

The Legislature provided the same authority to allow nongame mammals that are injuring growing crops or other property to be taken *at any time or in any manner*³. According to data provided to Wildlife Services by individual cooperators, between 2002 and 2012, coyotes in California have caused nearly \$13.2 million in damages to human health, property, and at risk wildlife. The bulk of these damages were losses to California's farmers and ranchers through lost livestock, damage to irrigation systems and lost and damaged crops. These figures only account for the losses identified by landowners getting assistance from Wildlife Services and do not account for all coyote caused losses within the state.

Coyotes cause the greatest numbers of predator losses to California's livestock producers. In 2010, 57 percent of cattle and 75 percent of calves lost to predators were attributed to coyotes⁴. These figures equated to losses valued at \$2.8 million. In 2009, California sheep producers lost sheep and lambs valued at \$1.3 million to predators⁵. USDA does not gather data on the specific predator losses for sheep and lambs in California, but anecdotal evidence suggest the national data is representative of California sheep and lamb losses, which show coyotes to be the number one predator of sheep and lambs.

Coyotes have been expanding their habitat throughout California and are found in environments throughout the state. Their expansion has led, in part, to a reduction in the number of sheep produced in California. It is important that the Commission recognize the significant impact coyotes have on livestock producers and not reduce the tools available to protect livestock from coyotes and other predators by restricting take in Section 472.

Title 14 §465.5

Farm Bureau supports the idea of clarifying that Section 465.5 applies to neck snares. The current language prohibits the use of foot snares in the ranges of the San Joaquin Kit Fox and Sierra Nevada Red Fox. This prohibition makes the use of firearms the only tool available to protect livestock from predators in these areas. Firearms are not always an appropriate tool for predator control and clarifying that only neck snares are prohibited would allow the use of foot snares, which are designed to prevent trapping of non-target species, and would help better protect livestock in San Joaquin Kit Fox and Sierra Nevada Red Fox ranges.

Title 14 §460

Farm Bureau supports the clarification of Section 460 that take of the species listed in the regulation⁶ is prohibited for fur and allowed incidentally and for depredation. Farm Bureau is supportive of these changes as river otters and foxes do cause damage to farms and ranches. Farm Bureau would also recommend clarifying which red fox is referred to in the regulation, as red foxes are not native to California and consideration should be given as to whether to treat them differently than the native Sierra Nevada Red Fox.

³ Fish and Game Code Section 4152

⁴ USDA NASS Cattle Death Loss, May 2011

⁵ USDA NASS Sheep and Goat Death Loss, May 2010

⁶ Fisher, marten, river otter, desert kit fox and red fox

Coyotes

As discussed earlier, coyotes cause significant damage to farms and ranches in California. At the Commission's request, the Department of Fish and Wildlife (Department) began the process of reviewing the status of coyotes in California, modeling population and habitat suitability, and ultimately making recommendations regarding the regulations that govern coyote management in the state. While the Department has already begun this process, it has significant work ahead to complete the tasks. There is a significant amount of knowledge surrounding coyotes and their presence in California and Farm Bureau would urge against making regulatory changes to coyote management prior to the Department's review of coyote status. Coyotes are prevalent throughout the state and regulatory changes are likely to create significant impacts to California's farmers and ranchers who must live with them on a daily basis. It is important that the Commission take the opportunity to hear from affected Californians before changing coyote management. Farm Bureau will continue to participate in the discussions surrounding coyote management and will continue to gather information from our members about the impacts coyotes have on their farms and ranches to share with the Commission, and would ask that this information be considered as the Commission contemplates any management changes.

Farm Bureau appreciates the opportunity to comment on the many ideas being discussed by the Commission's Wildlife Resources Committee regarding predator management. The issues being discussed are extremely complex and require significant consideration to ensure there are no unintended consequences. Should you have any questions or need further information, feel free to contact me by phone (916/446-4647) or email (ncremers@cbbf.com).

Sincerely,



Noelle G. Cremers
Director, Natural Resources and Commodities

CC: Members, Fish and Game Commission
Mr. Sonke Mastrup, Executive Director, Fish and Game Commission
Mr. Chuck Bonham, Director, Department of Fish and Wildlife
Mr. Dan Yparraguirre, Deputy Director, Department of Fish and Wildlife