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September 19, 2023

California Department of Fish & Wildlife  
P.O. Box 944209  
Sacramento, CA 94244-2090

California Department of Fish & Game Commission  
Attention: Melissa Miller-Hensen  
P.O. Box 944209  
Sacramento, CA 94244-2090

Wildlife Care of Southern California  
Attention: Anna Reams  
352 Genial Ct  
Simi Valley, CA 93065

Dear members of the Wildlife Resource Committee,

The Wildlife Resource Committee is currently in the process of modernizing wildlife rehabilitation regulations. I am hoping this letter will be part of the ongoing discussion regarding the modernization of wildlife rehabilitation within the state of California. Discussions are taking a step in the right direction to enhance the professionalism of wildlife rehabilitation but fall short of addressing any of the critical issues this letter identifies. The modernization of wildlife rehabilitation rules is long overdue.

Wildlife Care of Southern California (WCSC), a wildlife rehabilitation group located in Simi Valley, California serves as a compelling example of why we urgently need to address four essential reforms: clear and well-defined rules and guidelines, consistent enforcement of regulations, enhanced oversight of wildlife rehabilitation groups, and improved educational requirements.

### **Clear and well-defined rules and guidelines**

Rules play a crucial role in establishing expectations and promoting responsible and ethical behavior for both individuals and organizations. The rule of law is a fundamental principle that ensures equality, fairness, and accountability. However, when the government enforces rules inconsistently, it creates the perception that different standards are applied to different stakeholders, in this case, non-consumptive and consumptive users. This double standard

undermines the very foundation of the rule of law and erodes public trust in the agency's ability to act fairly and impartially.

- Wildlife Care of Southern California has been allowed to conduct experimental treatment of bobcats and coyotes while their scientific collection permit is currently pending approval. The Scientific Permit Application was submitted for approval in October 2021. SCP ID: S-212440008-21265-001.
- Wildlife Care of Southern California fails to follow the National Wildlife Rehabilitation Association Standards as required in their Memorandum of Understanding (MOU) by disregarding city, county, and state wildlife feeding ordinances.
- Anna Reams, Director of Wildlife Care of Southern California disregarded direct instructions by Rebecca Barboza, Environmental Scientist for CDFW, by treating coyotes in the field for mange without justification or department approval.
- Wildlife Care of Southern California failed to follow annual training requirements under Section 679 (f)(8) for some volunteer members.

**The Department should assess the impact on wildlife populations and establish clear rules and guidelines before allowing field treatment of wildlife for an endemic disease like mange.**

Treating coyotes (*Canis latrans*) for mange without careful consideration may have dire consequences for future generations of coyotes, as it can hinder the development of their immune response since a portion of the population, however small, do recover from acute mange naturally (Pence and Windberg 1994). Therefore, it is crucial for the Department to thoroughly evaluate the impact on wildlife populations before intervention occurs and establish well-defined regulations and guidelines before approving field treatment for an endemic disease like mange.

Mange can serve as a significant factor in population regulation and natural selection among wildlife populations. Wildlife agencies typically allow diseases to progress naturally, recognizing them as integral components of the ecological process, particularly when the population is not under severe threat. However, treating coyotes for mange could disrupt the natural selection process by preventing treated individuals from developing a robust immune response to the *Sarcoptes scabiei* mite. This interference can have far-reaching implications, especially when a particularly virulent strain of mange emerges within the population. This is especially problematic for urban coyotes considering reduced genetic diversity is more likely to occur within urban coyote populations living in highly fragmented habitats (Adducci et al. 2020) making them more vulnerable to stochastic events.

In addition, unnecessary treatment could potentially result in a rise in the local coyote population, as mange infestations reduce ovulation and pregnancy rates among coyotes (Pence and Windberg 1984). This imbalance can trigger increased competition for resources and

increase conflicts between humans and coyotes. If the decision to treat coyotes for mange is made, it should be accompanied by a clear and justified rationale to avoid potentially negative consequences.

**Off-site mange treatment by feeding wildlife medicine-laced food in the field is a violation of Title 14 § 251.1 (Harassment of Animals).**

A story was printed in the Thousand Oaks Acorn (Bertholdo 2019), where WCSC openly discussed treating a coyote for acute mange outside of its care facilities by feeding the coyote medicine-laced food. Chief David Bess of the CDFW Law Enforcement Branch and former wildlife branch Chief Stafford Lehr determined this type of activity was illegal, a violation of 251.1 (Harassment of animals).

Later, through public records act requests it was determined between 2017 and 2022, the group treated over 240 coyotes in the field for mange by feeding them medicine-laced food. Many of the coyotes were treated after the group was told their activity was illegal. (Tab 1)

In an email from Stafford Lehr dated April 13, 2021, he made it clear: "I would like the WHL to verify that they informed the rehabber(s) in question that this is a prohibited action. They cannot be putting medicated food out in an uncontrolled situation. We made this very clear last year. Please respond to this group verifying that it has been confirmed that they are directed to cease this activity if in fact they are doing this."

Later, in an email from Victoria Monroe dated June 25, 2021, she stated "Field treatment for the purposes of wildlife rehabilitation is not explicitly prohibited in California." This is concerning as it appears to be a very liberal interpretation of the CDFW/WCSC MOU. Section 679 of Title 14 makes it clear what activities are authorized. The opening paragraph in the MOU clearly states: "Unless otherwise stipulated in this MOU," indicating WCSC is limited by what is articulated within the MOU and Title 14, neither of which provides an exemption for feeding wildlife outside of their rehabilitation facilities. (MOU pg. 1). The treatment of wildlife for acute mange outside of rehabilitation facilities is not an authorized activity.

Department emails revealed Anna Reams of Wildlife Care of Southern California was required to provide justification for the treatment of acute mange in coyotes with Environmental Scientist Rebecca Barboza to obtain approval prior to providing treatment. Department emails indicated Anna Reams failed to provide justification and obtain authorization for several coyotes treated in the field. In an email dated April 14, 2021, Rebecca Barboza said "Ms. Reams was instructed to contact me whenever she feels it necessary to treat mange in the field and that we would evaluate this on a case-by-case basis. She sent a list of animals that she had already planned on field treating. She did not properly justify each case and instead went ahead and treated in the field without our authorization."

**From:** Barboza, Rebecca@Wildlife  
**Sent:** Wednesday, April 14, 2021 10:02 AM  
**To:** Konde, Lora@Wildlife; Monroe, Victoria@Wildlife; Thompson, Christine@Wildlife  
**Cc:** Clifford, Deana@Wildlife; Rudd, Jaime@Wildlife  
**Subject:** RE: Rehabbers treating coyotes in the field  
**Attachments:** Re: Re.; Untitled; RE: #2 on the previous list Treated; RE: [EXTERNAL] Re: Coyotes in the field; RE: Re.; RE: Re:

Attached is a series of emails that hopefully describes what happened after the phone call. Ms. Reams was instructed to contact me whenever she feels it necessary to treat mange in the field and that we would evaluate this on a case by case basis. She sent a list of animals that she had already planned on field treating. She did not properly justify each case and instead went ahead and treated them in the field without our authorization.

If I can find anything else that is relevant I will send it along.

Title 14 and the Memorandum of Understanding (MOU) is the basis for which activities wildlife rehabilitation groups are authorized to do while rehabilitating wildlife. The MOU is clear "pursuant to Section 679 Title 14 California Code of Regulations (CCR); the Third Edition 2000 National Wildlife Rehabilitation Association/International Wildlife Rehabilitation Council Minimum Standards for Wildlife Rehabilitation; and the conditions listed below." By signing the MOU, the "permittee is agreeing to comply to all of the conditions in this MOU and with the provisions of section 679, Title 14 of the California Code of Regulations." The copy of the MOU held by WCSC specifically states AUTHORIZATION(S) and the SPECIFIED CONDITIONS they are to adhere to. (MOU pg. 6).

#### **The following problems have been found within the WCSC Scientific Collection Permit:**

Wildlife Care of Southern California has been allowed to conduct uncontrolled experimental treatment of Bobcats and Coyotes on a permit currently listed as pending. The Scientific Permit Application was submitted for approval in October 2021. (SCP ID: S-212440008-21265-001).

- **The off-label use of Bravecto (Fluralaner) for treating mange in coyotes.**

When a medication is used off label, it means it is being utilized in a manner not specifically approved by regulatory agencies. This often means that there is limited or no scientific evidence regarding its off-label use. Treating wildlife with medications off label raises concerns related to safety, efficacy, adverse effects, treatment outcomes, legal implications, and the overall well-being of the animals. It is generally recommended to follow approved and established protocols to ensure the best possible care and outcomes for animal health. (Tab 2, pg. 15)

- **The absence of follow-up care disregards potential secondary infections and recognized side effects of Bravecto (Fluralaner) that may arise after treatment.**

The activities outlined in the WCSC Scientific Collection Permit (Tab 2) failed to recognize any need for aftercare. This is seriously problematic due to the high potential for secondary bacterial and fungal skin infections associated with acute mange in coyotes such as *Staphylococcus pseudintermedius* (DeCandia et al. 2019). Additionally, the lack of post-treatment care means that any side effects related to Bravecto (Fluralaner) cannot be addressed. Although rare, adverse

side effects listed by the Food & Drug Administration for the oral administration of Fluralaner in dogs include vomiting, lethargy, seizures, and death (FDA 2018).

**Failing to follow the National Wildlife Rehabilitation Association Standards as required in the CDFW/WCSC MOU by not following city, county, and state wildlife feeding ordinances.**

WCSC is required to follow the National Wildlife Rehabilitation Association Standards listed within its MOU. WCSC violated its MOU by not following the "Code of Ethics" within NWRA Standards. Found within WCSC End of Year reports, the group indicated the number of coyotes and which cities they were "treated in the field." The field treatment of coyotes as indicated by WCSC involves placing "Oral Bravecto in a piece of meat, carrion, or rat" (Tab 2, pg. 15) a violation of local ordinances in Duarte, Glendora, Los Angeles, Monterrey Park, and Los Angeles County, California (codes attached).

Within WCSC's MOU they are required to follow the "Third Edition 2000 National Wildlife Rehabilitation Association/International Wildlife Rehabilitation Council Minimum Standards for Wildlife Rehabilitation. (NWRA Standards). Within the guide there is a "Code of Ethics" (Tab 3, pg. 7, item 3) stating the following: "A wildlife rehabilitator must abide by local, state, provincial and federal laws concerning wildlife, wildlife rehabilitation, and associated activities." Ignoring local feeding ordinances and failing to get permission from local cities is a violation of NWRA Standards and their MOU.

Wildlife Care of Southern California was sent two letters by the City of Glendora and one letter by the city of Duarte where they were advised their activities violated local municipal code. The city of Glendora sent one letter on February 16, 2023. Wildlife Care of Southern California continued their prohibited activities resulting in another letter from the city of Glendora on June 7, 2023, advising the group their activities were in violation of Glendora municipal code. (Tab 4).

Allowing wildlife rehabilitation groups to ignore the same rules cities are asked to enforce through the "Keep Me Wild" program undermines the message of responsible wildlife management conveyed by CDFW. It is essential for CDFW to ensure consistent messaging and enforce rules intended to safeguard ecological balance and protect both wildlife and communities.

**Wildlife Care of Southern California failed to provide annual training for wildlife volunteer Jonsie Ross while Ross actively treated wildlife for WCSC, a violation of Title 14 Section 679(f)(8).**

Section 679(f)(8) "All wildlife rehabilitation facility personnel, professional and volunteer, shall satisfactorily complete one department-approved wildlife rehabilitation training session each year. Training may include sessions in wildlife identification, wildlife capture and restraint,

wildlife laws and regulations, veterinary medical, and other subjects approved by the department. The training shall be a minimum of two hours."

Training documents provided to the California Department of Fish and Wildlife by Wildlife Care of Southern California; Jonsie Reynolds-Ross was not indicated to have participated in annual training for Wildlife Care of Southern California despite acting as one of their volunteers that has treated coyotes in the field for mange on behalf of the organization (Tab 5).

October 6, 2017

"The day Marquez went to lay out chicken for Franky, she got a text message from a woman named Jonsie Reynolds-Ross, a volunteer at Wildlife Care of SoCal, an organization that rescues and rehabilitates wild animals in California. As it turned out, the wildlife group had also been keeping an eye on Franky, and Reynolds-Ross was traveling to Whittier the next morning to try and catch him." (Alberts 2017)

September 5, 2019

"Wildlife Care volunteer Jonsie Ross traveled to Lynn Ranch and left the coyote food spiked with medicine to cure its mange." "Anna Marie Reams, Wildlife Care director, said the center started tracking what is believed to be the same coyote in May." (Bertholdo 2019)

### **The need for enhanced oversight of wildlife rehabilitation groups**

The department's staff have shown evidence of bias through the selective interpretation of regulations, thereby neglecting to hold Wildlife Care of Southern California accountable for their documented violations. When alerted to the fact that WCSC was continuing to provide food to wildlife to treat them for mange outside of their designated facilities, Victoria Monroe stated the activities were "not explicitly prohibited" and "did not technically violate any conditions of the MOU." Department correspondence via email revealed WCSC was obliged to "properly justify each instance of mange" to "obtain authorization." This authorization was to be obtained through communication with Environmental Scientist Rebecca Barboza. If this accurately represents the situation, WCSC's feeding activities occur without proper authorization either under the guidance of Department staff, CDFW/WCSC Memorandum of Understanding or in accordance with Title 14 regulations.

The Wildlife Rehabilitation section within CDFW has allowed WCSC to conduct uncontrolled experiments for the field treatment of bobcats and coyotes for mange with a Scientific Collection Permit listed as "pending" since 2021 (Tab 2). Equally concerning, CDFW has received annual reports clearly indicating WCSC has conducted field treatment, consisting of feeding coyotes medicine laced food. Over 240 coyotes for mange between 2017 and 2022 (Tab 1) despite

Deputy Director Lehr and Chief David Bess stating this was a violation of Title 14, California Code of Regulation § 251.1. Harassment of Animals."

Oversight of wildlife rehabilitation groups is critical to ensure the responsible and ethical treatment of wildlife and to maintain public trust in the California Department of Fish and Wildlife (CDFW). The current lack of clear rules and regulations, along with ineffective enforcement, poses significant challenges that must be addressed.

### **Receiving the Native Wildlife Rehabilitation Tax Fund Grants in 2021 and 2022 when WCSC likely did not qualify due to Title 14 and MOU violations.**

WCSC has been awarded the Native Wildlife Rehabilitation Tax Fund Grant in 2021 and in 2022, totaling \$18,000 (\$9,000 each year). The problem is, in order to be eligible for the program, potential awardees must "Be in compliance with all conditions of the Wildlife Rehabilitation Memorandum of Understanding, CDFW permits, and additional federal permits (as needed)." (Monroe 2020)

The allocation of \$18,000 in taxpayer funding to Wildlife Care of Southern California (WCSC) through the Native Wildlife Rehabilitation Voluntary Tax Contribution Fund Grant in 2021 and 2022 raises significant concerns about the optics of awarding funds to a group that failed to meet eligibility requirements. It is essential for CDFW to reassess their criteria and enforcement mechanisms to ensure that taxpayer funds are allocated to organizations that meet the required eligibility requirements.

### **Disseminating inaccurate and misleading content through their website**

On their website, Wildlife Care of Southern California states the following:

"Mange is a mite that most animals have but a good diet and healthy immune system can fight off, this condition is caused by a compromised immune system. Rodent poison has been positively determined by the NPS and DFW to cause death and debilitating mange in bobcats, and fox and we know it secondarily kills owls, hawks and smaller animals." - <https://wildlifecareofventura.org/coyotes-with-mange/>

Mange is not a mite, mange is the skin disease caused by various mites that infest the skin of an animal, in the case of coyotes, the *Sarcoptes scabiei var. canis* mite. There is no evidence "most animals have the mite that causes mange." In many studies, mange was found to be enzootic. "Enzootic" primarily describes the endemic nature of a disease within a particular animal population, rather than the individual prevalence of the disease within that population. It indicates that the disease is regularly present and circulating within the population, even if only a portion of the animals are affected at any given time.

Additionally, the National Park Service and Department of Fish and Wildlife have not come to a determination that rodent poison causes mange in bobcats. One long term study conducted indicated a possible "synergistic relationship" between exposure to anticoagulant rodenticides

and mange. However, the study made it clear "although we have demonstrated a strong association between anticoagulant exposure and notoedric mange, this is not the same as establishing cause and effect" noting that "not all anticoagulant exposed bobcats... contract mange." (Riley 2007)

Providing incorrect information to the public can lead to a distorted understanding of issues. This can result in misconceptions, false beliefs, and misplaced concerns. People may make decisions based on inaccurate information, which can lead to ineffective or harmful actions.

**There is a lack of clearly defined "department-approved" training, raising concerns about the quality and relevance of the training received by wildlife rehabilitation personnel.**

Section 679(f)(8): All wildlife rehabilitation facility personnel, professional and volunteer, shall satisfactorily complete one department-approved wildlife rehabilitation training session each year. Training may include sessions of wildlife identification, wildlife capture and restraint, wildlife laws and regulations, veterinary medical and other subjects approved by the department. The training shall be a minimum of two hours.

In the case of Wildlife Care of Southern California (WCSC), it was observed that in some years no training sessions were conducted at all while "applying for permits" and "watching documentaries" were listed as annual training in other years. This lack of consistency and the lack of clearly defined "department-approved" training raise concerns about the quality and relevance of the training received by wildlife rehabilitation personnel.

Elevating educational requirements in wildlife rehabilitation is crucial, given the involvement of these groups in public education on conservation related issues. Incorporating scientific literacy assessments into wildlife rehabilitator tests helps ensure a comprehensive understanding of biology, ecology, and the accurate interpretation of scientific literature.

**Feeding wildlife contradicts department policy and the "Keep Me Wild" program.**

The actions of Wildlife Care of Southern California and the concerns raised are at odds with the goals and principles of CDFW's Keep Me Wild program. This program aims to educate the public about the importance of preserving the natural behavior of coyotes and keeping them wild. WCSC's behavior contradicts these principles. Their experimental treatments and provision of medicine-laced food to coyotes in the field interfere with the natural fear and caution that coyotes should have towards humans. This behavior can contribute to conflicts between humans and wildlife, as habituated coyotes may pose risks to human safety and domestic animals.



## **Conclusion**

The modernization of wildlife rehabilitation regulations in California is long overdue. The ongoing discussions through the Wildlife Resource Committee are a step in the right direction, but they fail to address the critical issues identified in this letter. The California Department of Fish and Wildlife (CDFW) holds the responsibility of being stewards of the state's natural resources, this stewardship responsibility does not end when the baton has been passed on to wildlife rehabilitation groups.

The Wildlife Care of Southern California (WCSC) case illustrates the need for increased educational requirements, clearly written rules, and increased oversight of wildlife rehabilitation groups. Inconsistent enforcement of Title 14 rules and regulations and the Memorandum of Understanding (MOU) between CDFW and WCSC raises questions about fairness and accountability.

Violations of local ordinances and disregard for instructions from Department staff indicate a blatant lack of respect for the rule of law and department personnel. Such actions undermine the integrity of the current system and reflect a complete disregard for established protocols.

By addressing these concerns and taking steps to enforce rules, clarify requirements, and improve oversight, the California Department of Fish and Wildlife can enhance the professionalism and integrity of wildlife rehabilitation within the state.

Thank you.

Steven Childs

A handwritten signature in black ink, appearing to read 'S Childs', with a long horizontal flourish extending to the right.

## Literature Cited

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## Email correspondence

**From:** Steven Childs <[steve@sdchilds.com](mailto:steve@sdchilds.com)>  
**Date:** April 13, 2021 at 10:34:01 AM PDT  
**To:** "Lehr, Stafford@Wildlife" <[Stafford.Lehr@wildlife.ca.gov](mailto:Stafford.Lehr@wildlife.ca.gov)>, "Struble, George@Wildlife" <[George.Struble@wildlife.ca.gov](mailto:George.Struble@wildlife.ca.gov)>  
**Subject:** Rehappers treating coyotes in the field

**WARNING:** This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Mr. Lehr, the reason I continued to ask about whether or not it was illegal for wildlife rehappers to feed coyotes to treat them for mange in the field (at the last Coyote Workshop) was that one group in particular was told by enforcement over a year ago that the activity was illegal and they continue to do it.

This group solicits the publics help so they can find the coyotes and feed them medicine laced food. I found this flyer a few minutes from my home in Sierra Madre. Scores of flyers were stapled to telephone poles.

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**From:** Lehr, Stafford@Wildlife <[Stafford.Lehr@wildlife.ca.gov](mailto:Stafford.Lehr@wildlife.ca.gov)>  
**Sent:** Tuesday, April 13, 2021 10:39 AM  
**To:** Monroe, Victoria@Wildlife <[Victoria.Monroe@Wildlife.ca.gov](mailto:Victoria.Monroe@Wildlife.ca.gov)>; Konde, Lora@Wildlife <[Lora.Konde@wildlife.ca.gov](mailto:Lora.Konde@wildlife.ca.gov)>; Gardner, Scott@Wildlife <[Scott.Gardner@wildlife.ca.gov](mailto:Scott.Gardner@wildlife.ca.gov)>  
**Cc:** Bess, David@Wildlife <[David.Bess@wildlife.ca.gov](mailto:David.Bess@wildlife.ca.gov)>; Arnold, Nathaniel@Wildlife <[Nathaniel.Arnold@wildlife.ca.gov](mailto:Nathaniel.Arnold@wildlife.ca.gov)>; Struble, George@Wildlife <[George.Struble@wildlife.ca.gov](mailto:George.Struble@wildlife.ca.gov)>  
**Subject:** Fwd: Rehabbers treating coyotes in the field

So trying to not make more work but Mr. Childs has raised this again. I would like the WHL to verify that they informed the rehabber(s) in question that this is a prohibited action. They cannot be putting medicated food out in an uncontrolled situation. We made this very clear last year. Please respond to this group verifying that it has been confirmed that they are directed to cease this activity if in fact they are doing this. Thank you.  
Stafford

Stafford Lehr  
Deputy Director  
Wildlife and Fisheries Division  
California Department of Fish and Wildlife

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**From:** Monroe, Victoria@Wildlife <[Victoria.Monroe@Wildlife.ca.gov](mailto:Victoria.Monroe@Wildlife.ca.gov)>  
**Sent:** Wednesday, April 14, 2021 9:28 AM  
**To:** Barboza, Rebecca@Wildlife <[Rebecca.Barboza@wildlife.ca.gov](mailto:Rebecca.Barboza@wildlife.ca.gov)>; Thompson, Christine@Wildlife <[Christine.Thompson@wildlife.ca.gov](mailto:Christine.Thompson@wildlife.ca.gov)>  
**Cc:** Clifford, Deana@Wildlife <[Deana.Clifford@wildlife.ca.gov](mailto:Deana.Clifford@wildlife.ca.gov)>; Rudd, Jaime@Wildlife <[Jaime.Rudd@wildlife.ca.gov](mailto:Jaime.Rudd@wildlife.ca.gov)>; Konde, Lora@Wildlife <[Lora.Konde@wildlife.ca.gov](mailto:Lora.Konde@wildlife.ca.gov)>  
**Subject:** RE: Rehabbers treating coyotes in the field

Hi Rebecca & Christine,

Thank you! See below. Summary of additional info that I provided yesterday. We are on standby, as further guidance is provided on how to address this matter.

- Last year, communication was coordinated with & handled through SED/Region.
- At that time, it was determined that field treatment of mange coyote did not *technically* violate any conditions of the wildlife rehabilitation MOU as currently written. It was flagged for potential revision prior to the next wildlife rehab/MOU renewal cycle.
- The information provided by Mr. Childs seems to indicate an escalation of field activities by this rehab group.
- If a violation is confirmed by LED, Ms. Ream's could lose her grant award as the terms of the agreement require full legal compliance. She would also be at risk of having her permit revoked.

Stay healthy & safe,

Vicky

*Vicky Monroe*  
Conflict Programs Coordinator  
Human Dimensions of Wildlife / Human-Wildlife Interactions / Gray Wolf / Mountain Lion

On Fri, Jun 25, 2021 at 3:59 PM Steven Childs <[steve@sdchilds.com](mailto:steve@sdchilds.com)> wrote:

Thank you for getting back to me Victoria. My original question was if you knew how Wildlife Care of Southern California was treating coyotes in the field for mange. By your response, I'm guessing you don't know.

It's frustrating getting inconsistent answers to these questions. Chief of Enforcement David Bess told me in person feeding coyotes in the field to treat them for mange was illegal and said he would have enforcement speak with Anna Reams at Wildlife Care of Southern California. Now you're telling me it is not explicitly prohibited. Considering the ongoing coyote workshops and the consistent messaging regarding feeding coyotes and how it often leads to conflict, I would really appreciate a clear answer on how Wildlife Care of SoCal is treating coyotes in the field for mange and whether or not that is being authorized by CDFW. I was told by one of the wildlife rehabbers associated with WCSC (Candy Rinard) that they have permission from CDFW to treat coyotes in the field for mange. (attached screenshot). Do they have permission to do this?

I have to point out that even though you're saying treating coyotes in the field for mange is not expressly prohibited, it is not specifically authorized either. Per Wildlife Care of SoCals MOU, they are required to adhere to Title 14 rules and regulations. There are no exemptions that I'm aware of in Title 14 for wildlife rehabilitators to feed coyotes outside of their rehabilitation facilities.

I'd really appreciate some clarification on these issues.

On Fri, Jun 25, 2021, 2:58 PM Monroe, Victoria@Wildlife <[Victoria.Monroe@wildlife.ca.gov](mailto:Victoria.Monroe@wildlife.ca.gov)> wrote:

Hi Steven,

Thank you for your outreach! Apologies for delayed reply, this email came through while I was out of office. CDFW does not encourage the field treatment of wildlife. Field treatment for purposes of wildlife rehabilitation it is not explicitly prohibited in California.

Deputy Director Lehr referred to potential violation of Title 14, California Code of Regulation [§ 251.1. Harassment of Animals](#), if an intentional act disrupts an animal's normal behavior patterns, which includes, but is not limited to, breeding, feeding or sheltering. Normal behavior patterns may differ by species and environment or habitat. If a potential violation is suspected, reporting parties should contact the CDFW [CalTIP](#) online or by phone (1-888-334-CalTIP).

Stay healthy & safe,

Vicky

*Vicky Monroe*

Conflict Programs Coordinator

Human Dimensions of Wildlife / Human-Wildlife Interactions / Gray Wolf / Mountain Lion