Wildlife Resources Committee

September 12,2024

Re: Item 5 Take of nongame mammals

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While the Commission respects diverse views and opinions, due to the misrepresented manipulated information in Rebecca Dmytryk's presentation (Wildlife Resource Committee meeting September 9, 2023), I strongly urge the Commission to reject her challenge to Fish and Game Code sections 4152 and 4180.

To begin with, the premise of the challenge presented by Dmytryk and others rests on the idea codes 4152 and 4180 may require wildlife to be in the process of causing damage and/or injuring property in order to be legally trapped. Code sections 4152 and 4180 do not restrict trapping, these codes simply allow broader take (any time or in any manner) when nongame mammals are found to be injuring growing crops or damaging property. Injuring crops or damaging property is not a requirement of take, rather these circumstances allow for broader take.

**Factual issues within Rebecca Dymtryk's presentation that demand closer attention.**

None of the studies cited in exhibit 1 from the Wildlife Resource Committee meeting on September 19, 2023 presentation, on page "Effectiveness" directly speak to trapping as a means to reduce conflict with coyotes, let alone discusses its effectiveness. Especially concerning is every citation was misrepresented and the context manipulated to support the authors assertions in the presentation. Dymytryk used generalizations from introduction sections of studies rather than specific findings. None of the papers cited directly support the assertions made by Dmytryk.

"Coyote populations return to approximate pre-trapping levels in less than 1 year. (Kilgo et al, 2017)"

Kilgo et al, 2017 does not say this. Rather, Kilgo states coyote populations "appear" to recover quickly through compensatory reproduction and immigration and does not provide any specific time for population recovery.

"Coyotes demonstrate reproductive compensation and compensatory immigration. (Minnie et al 2016)"

Minnie et al did not make any direct observations regarding coyote reproduction and ecology. The study tested to see if hunted jackal populations display compensatory demographic and reproductive patterns by examining changes in hunted and non hunted area populations.

"Exploited populations exhibit increased pregnancy rates and litter size. (Kilgo et al., 2017)"

Kilgo et al, does not claim increased pregnancy rates or increased litter sizes. Kilgo actually says "we did not record large increases in litter sizes but saw coyotes at one of the three sites breed at younger ages."

Complete elimination is not practical nor is it necessary to resolve conflicts. (Schmidt & Timm, 2007).   
  
Schmidt and Timm articulate how coyote control is not coyote elimination then go on to state potential benefits of selective removal such as restoring fear of humans by coyotes. On selective removal of problem coyotes "it is often possible for professionals to remove them (coyotes) by use of firearms or traps. This is predator damage control, not “predator control”; no attempt is made to exterminate the entire population of coyotes. Complete elimination is not practical nor is it necessary to solve the problem. Many coyotes in a neighborhood may be invisible to residents, living on rodents and

lagomorphs and avoiding people during the day. It is the problem animals that require

targeting.":

**Ecological issues within Rebecca Dymtryk's presentation that demand closer attention.**

The Dmytryk presentation focused on coyote removal through trapping as being ineffective and the sole mechanism for increased reproduction and immigration failing to consider other modes of mortality either naturally through disease or anthropogenic through vehicle strikes (Margenau et al. 2023) and anticoagulant rodenticides (Riley et al 2003). Focusing specifically on mortality caused by trapping, while ignoring other causes, reflects a limited understanding of urban wildlife ecology and reveals an anti-trapping bias.

Wildlife management decisions often involve public and stakeholder input. If the public perceives that regulation changes are based on misrepresented information, it can erode public trust in wildlife management authorities and undermine the role of science in informing policy. This loss of trust can lead to resistance against future regulations, even when they are based on accurate and well-researched information.

Thank you for your consideration.

Sincerely,

Steven Childs

Literature Cited

Kierepka, E. M., J.C. Kilgo, and O.E. Rhodes Jr. 2017. Effect of compensatory immigration on the genetic structure of coyotes. The Journal of Wildlife Management. 8:1394-1407.

Kilgo, J., C.E. Shaw, M. Vukovich, M. J. Conroy and C. Ruth. 2017. Reproductive characteristics of a coyote population before and during exploitation. The Journal

of Wildlife Management. 8:1386-1393.

Margenau, L.S., R.E. Russell, A. T. Hanrahan, N. M. Roberts, J. L. Price-Tack, and D. J. Storm. 2023. Survival and cause-specific mortality of coyotes in Wisconsin. Journal of Mammalogy. 4:833–845.

Minnie, L. G. A. and G. Kerley. 2016. Compensatory life-history responses of a

mesopredator may undermine carnivore management efforts. Journal of Applied Ecology. 53:379-387.

Riley, S. P. D., Sauvajot, R. M., Fuller, T. K., York, E. C., Kamradt, D. A., Bromley, C., & Wayne, R. K. 2003. Effects of Urbanization and Habitat Fragmentation on Bobcats and Coyotes in Southern California. Conservation Biology. 2:566–576.

Schmidt, R. H. and Timm, R. M. 2007. Bad dogs: Why do coyotes and other canids become unruly? Wildlife Damage Management Conferences Proceedings.287-303.