

Date: 6/29/16
Submitted in PAW Committee
Council File No: 16-0585
Item No.: 2
Deputy: Adam R. Lid

June 26, 2016

To: Members of the Personnel and Animal Welfare Committee ("Committee")

From : Mark Steinberg, Los Feliz resident

Re: Council File #16-0585, "California Department of Fish and Game/Coyote Sightings" (Comments re: draft submission of Department of Animal Services)

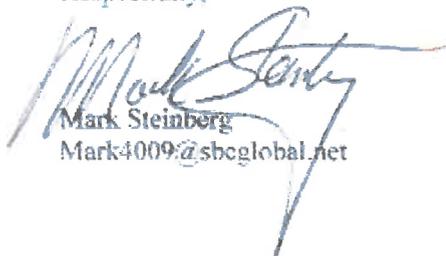
Honorable Committee Members:

I write to offer observations and suggestions directed to the document submitted by the General Manager of the Department of Animal Services ("Department") on June 24, which she characterizes, in part, as "a detailed plan on the Department's Coyote Management Program" ("Plan"). My comments will address the document's substantive deficiencies, its omission and misleading citation of expert opinion, and its failure to suggest or address elements that are essential to a document deserving of the descriptor, "Plan." I will also offer suggestions for provisions that I believe are essential to render any coyote management plan approved by this Committee a meaningful document.

To be clear, I do not support the indiscriminate killing or inhumane treatment of coyotes. I also wholeheartedly embrace the view that public education is an essential element of any coyote management plan. That said, I cannot accept the major premise of the Plan: that public education is the entire answer to the growing problem of aggressive coyotes in our City, a problem that one of the members of this Committee denominated more than a year ago as a "public safety" issue.

I would be pleased to respond to questions and to supply additional information should the Committee feel that would be helpful.

Respectfully,



Mark Steinberg
Mark4009@sbglobal.net

Introduction

The Plan the Department has submitted to the Committee represents nothing more nor less than a cut-and-paste of outdated material wedded to snippets of articles and opinion whose grain marches in a single, predictable direction. In essence, the Department is arguing that because nothing has really changed respecting the presence or behavior of the habituated coyote population in Los Angeles, no change is required in the Department's dated, untouched policies and practices.

In arguing for approval of the Plan, the Department performs gyrations worthy of a Cirque du Soleil performer. Among other things, it misstates and mischaracterizes facts; incorporates hoary data that is patently misleading; praises experts for statements in harmony with Department positions, while ignoring statements by the same experts that run counter to other Department positions; and offers not a hint of consultation with, or even review of articles written by, experts who hold opinions not in accord with the Department's version of the world.

What follows are facts and observations that detail these flaws, as well as suggestions for provisions that should be incorporated in any coyote management plan that ultimately emerges from this Committee.

I. The Plan Distorts or Simply Ignores Key Facts

A. Contrary to the Plan's Claim, the Level of Urban Coyote Activity, Particularly in Southern California, Has Increased Sharply

The Plan states at page 4: "CDFW and NPS acknowledge that there is no scientific data that proves or disproves that there is an increase in coyote activity in urban communities." Whatever the author may mean by "scientific data," there is unmistakable evidence that aggressive coyote behavior is on the rise across the nation and, in particular, in Southern California.

Perhaps the most profound evidence contravening the Department's statement is a report by the Los Angeles County Department of Public Health, set out below, which documents the number of coyote attacks on human beings that occurred within the County from the beginning of 2012 through mid-October of 2015.

<u>Date</u>	<u>Location</u>	<u>Incident</u>
2012 May	San Gabriel Valley	Person bitten while walking
2012 July	northern San Fernando Valley area	Person bitten while handling a coyote at a wildlife facility
2012 Aug	Cemetery in LA	Person bitten while sitting near grave. Did not have food.
2013 May	Santa Clarita	Person tried to scare away coyote in front yard, bitten on hand.

2013 July	western San Fernando Valley area	Person bitten while handling a coyote at a wildlife facility
2013 July	Arcadia	Person bitten while trying to stop coyote that was attacking dog
2015 Jan	Glen Dale	Person bitten while trying to stop coyote that was attacking dog
2015 June	Elysian Park area	Person running on trail -suddenly approached by coyote and bitten on leg
2015 July	Elysian Park area	Person bitten while trying to stop coyote that was attacking dog
2015 July	Elysian Park area	Person suddenly attacked by coyote
2015 Aug	Palmdale	Person bitten while jogging - 2 coyotes appeared and bit
2015 Aug	Elysian Park area	Person bitten while with family - were approached by pack of coyotes
2015 Aug	Elysian Park area	Two people sitting to look at stars, both bitten by coyote that approached.
2015 Sept	Elysian Park area	Kids playing - coyote approached and bit one
2015 Sept	Elysian Park area	Kids playing - coyote approached and bit one (different date)
2015 Sept	Elysian Park area	Person getting into car - coyote approached and bit leg - came back and bit again after person pushed it away, then chased person who ran into building
2015 Sept	Elysian Park area	Kids playing - coyote approached and bit one- multiple bites (different date)
2015 Sept	Elysian Park area	Kids playing - coyote chased and bit one (different date)
2015 Oct	Elysian Park area	Person lying on ground and coyote came up and bit foot
2015 Oct	Elysian Park area	Person lying on ground and coyote came up and bit foot (different date)

While the chart reports 15 injury-producing coyote attacks during the first ten months of 2015, that is not the full picture. Los Angeles was only one of several Southern California locations that suffered such attacks during that period. In May of 2015, for example, a child was attacked and injured in Irvine. <http://abc7.com/pets/irvine-childs-coyote-attack-4th-in-last-two-months/839307/>. In July, there were four attacks within a ten day period on Irvine children. <http://www.examiner.com/article/coyotes-attack-four-kids-irvine-california-town-placed-on-high-alert> Further, in January of 2015, a coyote attacked a female jogger in San Diego. <http://www.10news.com/news/woman-bitten-by-coyote-while-jogging-in-kensington-01212015>

These numbers demonstrate that there was a minimum of twenty injury-producing coyote attacks on humans in Southern California during calendar 2015. *En 1 Nine of these occurred barely ten minutes from the Department's headquarters. How, in the face of these facts, the Department can claim with a

straight face that, to its knowledge, aggressive coyote activity has not increased, is beyond comprehension.

A somewhat less dramatic demonstration of the absurdity of the Department's claim is the very Wikipedia entry on coyotes from which the Department has selectively drawn information appearing at page 3 of the Plan. What has been carefully "left behind" is a passage in the same Wikipedia entry, stating that coyote attacks have been "[i]ncreasingly frequent, especially in California. In the 30 years leading up to March 2006, at least 160 attacks occurred in the United States, mostly in the Los Angeles County area. Data from USDA Wildlife Services, the California Department of Fish and Game, and other sources show that while 41 attacks occurred during the period of 1988–1997, 48 attacks were verified from 1998 through 2003. The majority of these incidents occurred in Southern California near the suburban-wildland interface." <https://en.wikipedia.org/wiki/Coyote>

In sum, the Department is not simply wrong in claiming there has been no increase in aggressive coyote activity in Southern California, it is so very wrong that its credibility must be questioned.

B. The Department's Position on the Effectiveness of Hazing and the Use of "Intensive" Hazing Tools Contravenes Expert Opinion

In an attachment to the Plan, the Department's General Manager advises the public that when confronted by a bold coyote, the repeated use of a "humane hazing technique" will eventually prompt the animal to depart "for good." Plan at p13. Though she does not specifically identify hazing techniques or tools that are "inhumane," based upon a 2015 email exchange, it is clear that she regards paintball guns as falling into that category. ("The force of the paintball could cause serious injury to the eye of a coyote, a nearby pet, or a child or an adult. That is not a risk we take lightly nor do we see a need or reason to use potentially dangerous technique." Barnette to Steinberg email of July 30, 2015.)

Ms. Barnette's positions on the reliability of hazing and the impropriety of using "intensive" hazing techniques, such as paintball guns, run counter to expert opinion and practice, including that of an expert whose work the Department cites approvingly the very Plan it has submitted.

Dr. Stan Gehrt founded and heads the Cook County Coyote Project, a study of urban coyote behavior that began in 2000 and is today the largest of its kind in the country, if not the world. Since the project began, Dr. Gehrt has had the opportunity to study and, when appropriate, to affect the behavior of hundreds of radio-collared coyotes as they roam the Chicago metropolitan area. These experiences, paired with his own research into hazing, have left him unpersuaded that it is a reliable technique for altering a coyote's aggressive behavior.

In a report written for a Colorado community that retained him to evaluate its coyote management plan, Dr. Gehrt stated: "[V]irtually no data exist from controlled studies of urban coyotes as to the effectiveness of hazing in preventing or reversing habituation. Important questions, such as which techniques are more effective, how often do they need to be applied to a coyote, how long is the effectiveness, and to what extent can hazing reverse habituation (or boldness/aggressiveness) remain unanswered. There is uncertainty among professionals as to the effectiveness of hazing on altering the behavior of urban wildlife." <http://www.broomfield.org/DocumentCenter/View/1282>; http://digitalcommons.usu.edu/cgi/viewcontent.cgi?article=2696&context=wild_facpub

Dr. Gehrt has also not hesitated to make appropriate (and successful) use of a paintball gun as a hazing tool. "Human-Coyote Incident Report." Chicago, IL (April 2014). <http://urbancoyoteresearch.com/sites/default/files/Bronzcvilc%20Hazing%20Final%20Public%20Report.pdf>. See "Why Wild Animals Are Moving Into Cities, and What to Do About It." *Popular Science* (12/19/12).

Ms. Barnett's assertion that the use of paintballs is inhumane and ineffective also runs counter to the views of one of the nation's best-known coyote advocates, Camilla Fox, a Founding Director of Project Coyote. When in 2008 Ms. Fox learned that the Huntington Library in San Marino, California, had undertaken lethal control of the coyote population on its grounds, she and an official of the Humane Society of the United States authored a letter to the Library, objecting to the practice and suggesting a number of "Alternative Humane Solutions" to lethal removal, including "[P]roviding trained security personnel with rubber bullets or paintball guns to use in a highly selective manner for only those coyotes which may be displaying increasing brazenness despite other non-lethal methods being employed." The letter added that Project Coyote would provide training in the use of such aversive conditioning techniques. projectcoyote.org/newsreleases/huntingtonletter.pdf

Either Ms. Barnette's sense of what is and is not humane is more finely tuned than that of the best-known champion of the coyote in the United States, or she has taken a position against the use of paintball guns and similar tools without carefully considering the matter. Given that a researcher acknowledged by the Department to be a renowned expert and a preeminent coyote advocate have endorsed the use of non-lethal tools such as rubber bullets and paintball guns to deal with brazen coyotes, I strongly urge that any coyote management plan approved by this Committee include provisions for the use of such devices by trained professionals.

C. The Department's Refusal to Remove a Coyote Prior To An Attack Is Inhumane to Humans and Coyotes Alike

The Department refuses to move proactively in dealing with coyotes that manifest behavior on the threshold of an attack on a human being. Rather, it has chosen to deal with such animals reactively, allowing them to attack a human, then calling in authorities to find and kill the offending animal so that DNA and rabies testing can be performed. <http://www.laanimalservices.com/general-information/dangerous-animals/> (See definition of "dangerous animal")

The problem with the Department's protocol is that it unnecessarily puts at risk both potential human victims and many innocent coyotes. If a coyote's behavior telegraphs that it is poised to attack a human, perhaps by appearing repeatedly at the same location to take or by repeatedly threatening pets, a decision to remove that single coyote might spare a human a painful and dangerous experience and might also obviate the need to deal lethally with coyotes that are not responsible for the attack. In contrast, waiting to employ lethal means until a human has suffered an attack means both that the Department, on behalf of the potential victim, has accepted the risk and associated pain of a coyote bite, and, as well, has accepted the likelihood that multiple coyotes will have to be euthanized in order to find and test the attacker for a DNA match and rabies test.

The Department's choice to adopt a reactive rather than a proactive policy in protecting the public from highly aggressive, bold coyotes may buy a "quiet life," but the easy answer is often not the right one. In this case, there is ample evidence that the Department has opted for the former.

As previously noted, in the wake of several coyote attacks on children in Broomfield, Colorado, the town retained Dr. Gehrt, as well as Dr. Seth Riley of the National Park Service/UCLA, to review the events, then to examine the town's coyote management plan and to recommend any necessary changes. After examining the circumstances of the attacks, Gehrt and Riley produced a 38 page report recommending, in part, that the city use multiple reports of human incidents or attacks on attended pets in a specific area or timeframe as a criterion for considering lethal control. In their words:

"It is sometimes difficult to ascertain the severity of an incident, and whether a coyote exhibited 'dangerous' behavior from a single report, because individuals may not always be consistent in interpreting coyote behavior. However, multiple independent reports from a specific area within a relatively short time frame would indicate potentially dangerous coyote behavior that would warrant lethal removal prior to a human attack. Of course, the number of incidents and length of time are arbitrary and allow flexibility for decisions on lethal removal, and there may be instances when it is clear lethal removal is warranted from a single incident."

<http://www.broomfield.org/DocumentCenter/View/1282>.

(In accord with the Gehrt/Riley view, above: Drs. Robert Timm and Rex Baker, "A Review of Successful Urban Coyote Management Programs Implemented to Prevent or Reduce Attacks on Humans and Pets in Southern California," Proceedings of the 12th Wildlife Damage Management Conference (2007); "Coyotes," Publication 74135, University of California Agriculture and Natural Resources Integrated Pest Management Program; Dr. Stewart Breck, research wildlife biologist for the US Department of Agriculture's National Wildlife Research Center.

[Beckhttps://www.youtube.com/watch?v=uO_NXs8Vtfc&list=PL2_jEtoY8jijpa6kGFbJNNp_27iidTeao&index=10](https://www.youtube.com/watch?v=uO_NXs8Vtfc&list=PL2_jEtoY8jijpa6kGFbJNNp_27iidTeao&index=10)

The question, then, is why, if renowned experts have recommended targeted lethal removal of a brazen coyote prior to an attack on a human, on what basis has the Department ruled out that alternative? The answer, I suggest, is that in assembling the Plan, the Department was determined to avoid any information or opinion that ran counter to its existing policies and practices, irrespective of the source of that information or opinion. From the outset of the effort, the Department's goal was to minimize the number of changes a Plan might require.

II. The Plan Lacks A Mechanism for Measuring Its Progress, aka, "You Can't Manage What You Don't Measure"

Even if the Department were correct in recommending that its present policies and practices are the best possible approach to dealing with the problem of aggressive habituated coyotes, the Plan offers no means of measuring its progress towards that goal. The absence of such a measurement tool is unacceptable.

According to experts who study coyotes in urban environments, it is essential that there be a system for measuring the success or failure of any policy or approach to dealing with the problem of hold urban coyotes. This point was brought home succinctly by Dr. Stewart Breck, a research wildlife biologist for the US Department of Agriculture's National Wildlife Research Center and the author of the remark quoted in the heading.

[Beckhttps://www.youtube.com/watch?v=uO_NXs8Vtfc&list=PL2_jEtoY8jijpa6kGFbJNNp_27iidTeao&index=10](https://www.youtube.com/watch?v=uO_NXs8Vtfc&list=PL2_jEtoY8jijpa6kGFbJNNp_27iidTeao&index=10)

Dr. Breck's observation is indisputable. Any Plan for dealing with what one member of this Committee, more than a year ago, called an issue of "public safety," must provide for regular measurement of its effects. In other words, it must include a mechanism for tracking how many bold coyotes are threatening humans and pets; how many are being seen; and how many are encamped in the City.

Measurement of facts tangential or irrelevant to the actual, on-the-ground impact of the Plan should be put to one side. Thus, while it may be useful or interesting to know the number of "watch" training sessions that have been held, or the number of citizens who are involved in such a program, these factors provide no illumination on the critical question of whether the Plan is making a difference in the number and kinds of encounters we are having with these bold, aggressive animals.

Given the above, I strongly urge that any coyote management plan ultimately approved by the Committee include a clear articulation of the goal of the Plan, as well as a comprehensive, systematic, and continuous process for tracking progress towards that goal. The information gathered should include the number, location and times of coyote sightings; the number of attacks on pets; the kind and effectiveness of any hazing employed; and, of course, the number and details of any attacks on humans.

Anticipating the Department's response to this suggestion, I'd note that even if the data cannot be captured with absolute precision, it will provide a better pool of information than is now apparently available in easily manipulated form, for studying and reacting to what is actually happening in our backyards and streets. Failing to include such a regime in the Plan would be tantamount to an affirmative decision by the Committee to "fly blind" on this critical public safety matter.

III. The Plan must include a detailed process for coordinating actions and record-keeping across all relevant agencies and departments

The authors of the Plan imply that there is a well-oiled, highly coordinated collection and exchange of information amongst all officials charged with responsibility for any aspect of a coyote-related incident. However, while the Plan sets out details as to what occurs within the Department when an aggressive coyote report is received, when it comes to the mechanism for coordinating with outside entities, the description becomes vague, saying little more than the Department "works closely" with other involved agencies to share information.

I have had at least one personal experience that leads me to question whether "working closely" has a fixed meaning, or any meaning, within the Department.

In September of 2015, I learned there had been one or more coyote attacks on humans in the Elysian Park area of the City. In an effort to learn more about these attacks, I sent an email to Animal Services Officer Hoang Dinh, asking for details. The following communications ensued:

{Begin email exchange}

On Thu, Sep 24, 2015 at 5:40 PM, Mark R Steinberg <mark4009@sbcglobal.net> wrote:

*Hello again.. Officer Dinh,
A message I sent to you earlier has bounced back, and I wanted to make sure it reached you.
I've been told there have been one or more recent coyote attacks on humans, one a child, in the Elysian Park area. Would you kindly let me know if these reports are accurate and, if so, provide the details, including the Department's response?
Thanks very much*

Mark S.

Hoang Dinh <hoang.dinh@lacity.org> 09/28/15 at 10:44 AM

To Mark R Steinberg

Good morning. At the moment we are looking into it and the North Central Shelter is on high alert as well as the Park Rangers there. I will let you know more when I get better details. Thanks again.

*On Mon, Sep 28, 2015 at 10:46 AM, Mark R Steinberg <mark4009@sbcglobal.net> wrote:
Thanks. Is this one or multiple attacks?*

Hoang Dinh <hoang.dinh@lacity.org>

To Mark R Steinberg 09/28/15 at 10:51 AM

I am calling around to confirm as we email.

*Sent: Wednesday, September 30, 2015 1:49 PM
Subject: Re Elysian Park attacks (from Mark Steinberg)*

Officer Dinh:

I've just received from one of my neighbors the link, below, to a KTLA news story concerning the Elysian Park attacks, about which I inquired a week ago. When you have a moment, I'd appreciate your comments on the accuracy of the news report, as well as a description of the Department's involvement in, and response to, the attacks. I'd also like to know whether, in light of these and other recent attacks in the Los Angeles and Orange county areas, your Department is reevaluating its approach to dealing with the growing threat posed by habituated, aggressive coyotes.

Thanks for your help.

Mark Steinberg

<http://ktla.com/2015/09/29/visitors-to-elysian-park-warned-after-3-year-old-girl-was-bitten-in-the-neck/>

On Fri, Oct 9, 2015 at 2:05 PM, Mark R Steinberg <mark4009@sbcglobal.net> wrote:

Officer Dinh:

When you have a moment, would you kindly provide answers to the questions that I put to you in my September 30 email [above]?

Thanks very much.

Mark S.

On Oct 11, 2015, at 11:10 AM, Hoang Dinh <hoang.dinh@lacity.org> wrote:

Good morning, thank you for contacting me. I was going to reply to you last week with the same link attached. Obviously you already have it. Everything in the news report is what I know as of now too. I believe the Department of Rec and Parks along with CA Fish & Wildlife, handled it exigently. As for us, we documented the information and tried to reach out to the family for further, but do not want to press allowing the family their time, until they are ready to respond.

As far as reevaluating our approach, we have not stopped. Personally I have had weekly discussions with my supervisor on some of the research I come across. At the moment, the "Wildlife Watch" Program seems to be helping other communities and is spreading fairly fast (especially in Irvine, where a child was bitten). I believe even San Diego has contacted CA Fish & Wildlife regarding this program. I am also set to attend a meeting made up of many agencies across Southern CA.

Thanks again for contacting me and I have continued to patrol your area too (still haven't seen a coyote there, even at 3 am while looking for the reported feeder).

From: Mark Steinberg <mark4009@sbcglobal.net>
Date: October 11, 2015 at 12:34:28 PM PDT
To: Hoang Dinh <hoang.dinh@lacity.org>

Subject: **Re: Re Elysian Park attacks (from Mark Steinberg)**

Thanks for your note. As more facts about the attack come to light, I hope you'll pass them on.

In connection with the response to the attack, did your Department also take reactive or remedial action, such as using or sending officers into the field with "intensive hazing" tools, such as paintball guns? Also, I take it that by "exigent" actions, you mean removal of coyotes in the area. Have any coyotes been sighted in the area since those removals?

As to the status of our neighborhood problem, give me a call when you have the time.

Thanks again for your reply.

Mark S.

From: Brenda Barnette <brenda.barnette@lacity.org>
To: Mark Steinberg <mark4009@sbcglobal.net>; Hoang Dinh <hoang.dinh@lacity.org>
Sent: Sunday, October 11, 2015 6:08 PM
Subject: **RE: Re Elysian Park attacks (from Mark Steinberg)**

*Hello Mark,
State Fish and Wildlife trumps the City Department and they took charge of this incident.
Brenda*

On Sun, Oct 11, 2015 at 9:19 PM, Mark R Steinberg <mark4009@sbcglobal.net> wrote:

Brenda,

Thanks for replying to my note to Officer Dinh. I've a few follow-up questions:

—How long after the attack on the child was Fish and Wildlife informed of the event? Prior to Fish and Wildlife assuming responsibility, did Animal Services take any action to deal with coyotes in the vicinity of the attack, such as mobilizing the SMART team and/or authorizing the use of "intensive hazing" or lethal devices?

—Did your Department issue any statement or public warning about the attacks? Were you precluded from doing so prior to the involvement of Fish and Wildlife?

There's no need for an immediate turnaround on these questions. Brenda, I know you have a few more pressing business to attend to.

Mark

From: Brenda Barnette <brenda.barnette@lacity.org>
To: Mark R Steinberg <mark4009@sbcglobal.net>
Sent: Tuesday, October 13, 2015 6:19 PM
Subject: **Re: Re Elysian Park attacks (from Mark Steinberg)**

Hello Mark,

Our officers were called in and did patrol the area. I'm sure that the Park Rangers also patrolled the area since they monitor the parks regularly. The Rangers work for Rec & Park Department. Fish and Wildlife was called in right away. The two

city departments and representatives from the Mayor's office met with Fish and Wildlife to discuss and Fish & Wildlife took the lead to handle this situation.

You will need to contact each of the agencies mentioned to find out their involvement. This is all of the information that I have.

Brenda

[End email exchange]

Per the exchanges above, between September 24, 2015, the date of my initial inquiry about attacks in Elysian Park, and October 11, 17 days later, Officer Dinh was unable to supply the most basic information about the attacks. Indeed, on October 11, I supplied the information to him. On the same day I sent him several follow-up questions concerning the attacks reported in the news. From that point forward, Ms. Barnette, rather than Officer Dinh, communicated with me.

In my exchanges with Ms. Barnette between October 11 and 13, the date of her final communication concerning my Elysian Park questions, she represented that she had little or no knowledge of the relevant events. As she put it, "You will need to contact [the Recreation & Parks Department and California Department of Fish & Wildlife]" to find out their involvement. This is all of the information that I have."

Given that the Department of Public Health reports that at least 11 humans were bitten by coyotes in Elysian Park between June and the end of September of 2015 (See chart in Section I. A., above), Officer Dinh's and Ms. Barnette's apparent ignorance of this situation is shocking, to say the least.

The question I pose to the Committee is whether these officials of the Department should have had in hand full information about the unprecedented Elysian Park events? If the answer is "yes," and if the failure to have those facts at hand was due to the absence of a well-defined, timely system for sharing amongst all relevant entities information concerning aggressive coyote behavior, particularly behavior causing injury to humans, I submit that any Plan ultimately approved by this Committee should provide for the design, implementation and use of such a shared database. At a minimum, I suggest that the Recreation & Parks Department, the LAPD, the Department of Public Health, and the California Department of Fish and Wildlife be included contribute to the system's design.

I further suggest that, at a minimum, the shared database include all information gathered by participating agencies and departments for the following incident categories:

- a. Coyotes chasing or taking pets in daytime.
- b. Coyotes attacking and taking pets on leash or near owners, as well as chasing joggers, bicyclists and other adults;
- c. Coyotes seen in and around children's play areas, school grounds, and parks in midday; and
- d. Coyotes acting aggressively toward adults in midday.

These four categories of behavior have been identified by several experts as steps leading to the threshold of an attack on a human. (The categories appear in Table 1 of "How to Manage Pests," submitted as "Item 1." in my public comment of 6/2/16) Thus, a category "d." incident would trigger the highest response level short of an actual attack.

In addition to serving as a tool for quickly mustering appropriate resources, the shared database would enable the pinpointing of areas of greatest activity, enabling the involved parties to focus efforts on the most serious incipient problems.

Finally, a critical underpinning of this suggestion, as well as the proposal that the Plan include a measurement component, is the existence within the Department of a procedural and technical infrastructure necessary to perform the relevant tasks. Although the Department has given broad assurances that it systematically collects and analyzes reports of aggressive coyote behavior, in order to insure that the systems it employs are adequate to perform both its current responsibilities and any new ones that emerge from this review, I urge the Committee to include in any Plan it ultimately approves a provision directing the Department to retain an independent expert to evaluate and report to the Committee on the adequacy of: 1. the Department's current practices for collecting data on the type, frequency and location of aggressive coyote behavior occurring within the City and; 2. the suitability of its computer software and hardware to provide useful compilation and analysis of that data. *Fn 2

IV. The Plan must commit the Department to providing timely, accurate information to the public about the nature and extent of the threat posed by aggressive coyotes

The following "Q"& "A" (excerpted) appears at page 16 of the Plan. It also appears on the Department's website. <http://www.laanimalservices.com/about-animals/wildlife/> :

"Q: I am worried about my children; do predators such as bobcats, coyotes, foxes and mountain lions attack, injure or kill people?"

"A: Can it happen? Yes. What are the chances? Wild animal attacks on people are extremely rare. In regards to coyotes, there is an estimate from the Department of Fish and Game that 1 to 5 people per year, per state that are injured due to a coyote. In Southern California from 1978 to 2009 it is estimated from reports that there have been 92 coyote attacks on people with 59 of these coyote attacks resulting in injury..."

The Department's failure to bring up to date the statistics and conclusions recited above is difficult to understand. What is clear, however, is that that failure has the potential to work serious mischief. Not only might it give citizens a false impression of the trend in aggressive coyote activity, but it might also discourage them from urging their elected representatives to take action to deal with what, since 2009, has become a much more serious problem.

One can draw a rough sense of the magnitude of the distortion worked by the continued publication of the statistics contained in the "Q" and "A" by comparing the numbers it reports with those contained in the chart provided by the Los Angeles County of Public Health, set forth in Section I. A., above.

The "Q" and "A," as currently displayed to the public, reports that over a thirty year period ending in 2009, there were a total of 59 injury-causing coyote attacks in the seven counties comprising "Southern California," leading to the conclusion that only two persons were likely to be injured each year by coyotes attacks in the entire Southern California area. In reality, the odds of personal injury from a coyote attack are much higher. Indeed, given the Department of Public Health numbers for 2015, the risk of such an event in Los Angeles County alone is at least ten times higher than the number currently reported on the Department's website for the entirety of Southern California.

I will not dwell on why the Department has failed to provide timely information to the public on this critical issue. The more important question is what the Committee intends to do to insure that the public is

consistently and accurately apprised of coyote activity in the city. Revision of the Plan, I suggest, affords an opportunity to respond to that question.

Specifically, I urge that any Plan ultimately approved by the Committee include a mechanism for maintaining and publicly reporting current, accurate and detailed information concerning present and past coyote activity in this region. There are ample existing models for such a tool.

For example, Newport Beach Animal Control currently maintains a site on which citizens can report coyote activity, view a map displaying the most recent coyote sightings and attacks, and obtain information about public education efforts, such as "Wildlife Watch."

http://nbpd.org/community/animal_control/default.asp Similarly, on the Long Beach Animal Control Services site, <http://www.longbeach.gov/acs/>, residents can read the city's coyote management plan and access an interactive map that displays and characterizes by aggression level both recent and historical coyote activity in all areas of the city. <http://tsdgis.longbeach.gov/ACSActivity/coyote.html>

In addition to providing a tool for tracking and publicly reporting coyote activity, I urge that any Plan include a requirement that the Department, on a quarterly basis, review for accuracy, timeliness and balance, all printed and electronic information concerning coyote-related matters that it makes available to the public. *Fn 3

V. Conclusion

For the reasons noted above, I submit that the Plan presented to the Committee is a grossly insufficient response to Councilman Buscaino's Motion and must be substantially revised. Such a revision must include a reexamination of the Plan in light of the deficiencies noted above, as well as a meaningful survey and detailed evaluation of diverse expert opinion.

Footnotes

*Fn 1 The chart and referenced news reports establish only the minimum number of attacks that occurred during the period. They do not include, for example, coyote-inflicted injuries in which the victim, perhaps for personal reasons, chose to avoid seeking treatment from a public authority, or incidents that did not otherwise draw press attention. They also do not include incidents reported to Animal Services or other authorities in which coyotes have threatened individuals at close range or have attacked pets in their presence. See, e.g., <http://www.inquisitr.com/1756135/coyote-goes-after-mother-and-baby-before-killing-two-dogs-in-suburban-rampage/>

*Fn 2 In part to determine the adequacy of the Department's existing recordkeeping system, I have formally requested information concerning the numbers of coyote attacks and bites recorded since 2008. The Committee may wish to defer consideration of the Motion pending the Department's response to that request.

*Fn 3 In addition to the misstatements and errors already noted, the Plan states at page 3 that "Coyotes are not considered or regulated as 'Game animals' according to the California Department of Fish and Wildlife (CDFW)." While the statement is literally correct, the implication that the coyote has been accorded some special, higher level of protection than game animals is false. In fact, the opposite is the case. Pursuant to Chapter 6, Section 472 of the 2015-16 Mammal Hunting Regulations of the California Fish and Game Commission, for hunting purposes coyotes are accorded the level of protection applicable to weasels, skunks, opossum, moles and rodents.