

COUNTY OF MENDOCINO  
DEPARTMENT OF AGRICULTURE  
890 N. Bush Street Ukiah, CA 95482  
PHONE (707) 234-6830  
FAX (707) 463-0240  
agcomm@mendocinocounty.org  
[www.mendocinocounty.org/ag](http://www.mendocinocounty.org/ag)



**Jim Donnelly**  
Agricultural Commissioner  
Sealer of Weights and Measures

### **Staff Report**

**TO:** Mendocino County Board of Supervisors  
**FROM:** Jim Donnelly, Agricultural Commissioner  
**DATE:** December 17, 2019  
**SUBJECT:** Integrated Wildlife Damage Management Program

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### **Background**

The proposed project consists of approving the Integrated Wildlife Damage Management (IWDM) Program to protect agricultural and livestock communities, human health and safety, natural resources and property from wildlife damage. Prepared for the Board's consideration is a resolution establishing a County IWDM Program and designating the program as the cooperative services agreement (CSA) between the County and the Wildlife Services California Office of the Animal and Plant Health Inspection Service (APHIS) of the United States Department of Agriculture (USDA).

A separate staff report submitted with this agenda item includes a review and discussion of the environmental impact report (EIR) prepared for the IWDM Program. In addition to review and analysis of the environmental impact of the IWDM Program, the EIR also contains detailed background information regarding the IWDM Program and descriptions of the Program. Where relevant, this staff report will refer to relevant pages of the EIR for a more detailed discussion.

Detailed background information on the history of federal, state and local regulatory programs related to animals and predator control can be found in Section 3.2 of the Project Description of the EIR, beginning on page 3-1.

### **Project Objectives**

As part of the CEQA process, the County identified the following objectives for a proposed wildlife damage management program:

- 1) Provide an administrative mechanism for the private citizens and property owners in Mendocino County to continue to request assistance for wildlife damage management services.
- 2) Facilitate access to on-site educational services (e.g., informational materials, advice, and demonstrations) provided by wildlife specialists regarding wildlife damage management specific to conditions in Mendocino County.
- 3) Implement an integrated approach to wildlife damage management that allows qualified professionals to consider the range of options available for wildlife damage management that take into account the species responsible, magnitude of the problem, environmental conditions, legal restrictions such as listed species and permitting, and other considerations to formulate an appropriate strategy for the situation.
- 4) Have a process through which professionals who specialize in wildlife damage management can continue to provide technical assistance to resource owners about the variety of non-lethal methods that can be used to resolve problems (e.g., animal husbandry practices, guard animals, fencing, frightening) and where it is appropriate for resource owners to resolve the problem themselves.
- 5) Ensure preference is given to non-lethal methods of wildlife damage management when practical and effective.
- 6) Ensure that methods and techniques for lethal control to handle wildlife damage situations that may be difficult or dangerous for the public to use are implemented by professionals who are specially trained in such methods and who provide those services in a legal manner that is protective of human health and the environment.
- 7) Provide a transparent process for monitoring and documenting wildlife damage management activities to ensure accurate reporting of the types of wildlife damage and number of wildlife species removed by lethal methods, and to help assess the impacts of wildlife damage and associated wildlife damage management activities in the County.
- 8) Continue to provide wildlife damage management at similar funding levels and ensure County funds for wildlife damage management are used in a fiscally responsible manner.
- 9) Ensure that processes remain in place for the protection of public safety.

### **Project Description**

Wildlife damage management is the science of reducing damage or other problems associated with wildlife and is recognized as an integral part of wildlife management. Wildlife damage management is often misunderstood and many individuals consider management options as

only lethal. However, wildlife damage management is a specialized field within the wildlife management profession and decisions are not predicated solely on biological rationale.

The purpose of the IWDM Program is to resolve conflicts with selected species that have caused damage to resource owners in the County. The IWDM Program includes management methods designed to protect agricultural and livestock commodities, human health and safety, property, and natural resources. These areas are summarized below, but see the Project Description of the EIR for a more detailed discussion, starting on page 3-10.

1. Wildlife Damage Management to Protect Agricultural and Livestock Commodities

This aspect of the IWDM Program is intended to manage wildlife damage as may occur to agricultural and livestock commodities. Cattle and calves are most vulnerable to predation during calving, and less vulnerable at other times of the year. However, sheep and especially lambs can sustain high predation rates throughout the year. In addition, other agricultural commodities may sustain damage inflicted by wildlife, such as ground squirrel damage to fields, crops, pastures and vegetable and fruit crops.

2. Wildlife Damage Management to Protect Human Health and Safety

This aspect of the IWDM Program is intended to manage human health and safety concerns, such as attacks on humans by wildlife, disease threats from rabies and plague outbreaks where wildlife act as reservoirs, threats from parasite transmission from wildlife to humans, odor and noise nuisances from skunks and raccoons under houses, and airstrike hazards from animals crossing runways at airports or airbases.

3. Wildlife Damage Management for the Protection of Property

The IWDM Program responds to requests from landowners and residents to alleviate property damage from animals, including, but not limited to: damage to roofing, building wiring, attacks on pets, consumption or destruction of landscaping, turf or nursery plants, and damage to irrigation systems.

4. Wildlife Damage Management for the Protection of Natural Resources

The IWDM Program can include protecting sensitive species or other natural resources from damage. This could include burrowing into stream banks, which undermines the integrity of the banks causing erosion and sedimentation. This also includes damage to natural resources caused by non-native species, such as feral swine. Rooting by feral swine cause soil disturbance, which can damage wetlands, watersheds and native habitats.

The IWDM Program employs an integrated approach to wildlife damage management; hence the program title of "Integrated Wildlife Damage Management Program." According to Wildlife Services Directive 2.105:

The WS program applies the IWDM (commonly known as Integrated Pest Management) approach to reduce wildlife damage. As used and recommended by the WS program, IWDM encompasses the integration and application of all approved methods of prevention and management to reduce wildlife damage. The IWDM approach may incorporate cultural practices, habitat modification, animal behavior management, local population reduction, or a combination of these approaches. The selection of wildlife damage management methods and their application must consider the species causing the damage and the magnitude, geographic extent, duration, frequency, and likelihood of recurring damage. In addition, consideration is given to non-target species, environmental conditions and impacts, social and legal factors, and relative costs of management options.

Additional discussion of the IWDM Program can be found beginning on page 3-16 of the Draft EIR. This discussion includes a summary of the decision model of Wildlife Services, as well as a detailed breakdown of the technical assistance provided to users of the IWDM Program regarding management devices and techniques (see pages 3-21 through 3-27) as well as direct control assistance (see pages 3-27 through 3-36).

Generally, under the IWDM Program, Wildlife Services personnel would provide technical assistance to resource owners covering a variety of methods that could be used to resolve problems and where it is appropriate for the resource owners to resolve the problem themselves. Wildlife Services personnel would also assist resource owners through educational programs on damage identification, prevention, and reduction, and by providing information on management activities such as guard dogs or by temporarily loaning some tools such as cage traps. Direct control assistance would mostly be provided for situations that require the use of methods and techniques that are challenging or unsuitable for the public to implement, especially those that may involve lethal management measures. Resource owners that are provided operational assistance would also be encouraged to use additional management strategies and sound husbandry practices, when and where appropriate, that could potentially further reduce damage.

### **Alternatives to the IWDM Program**

As part of the CEQA process, alternatives to the Wildlife Services' IWDM Program were reviewed, including a "non-lethal" program, which was analyzed at an equal weight level as the IWDM Program in the EIR. The purpose of the alternatives analysis of the EIR, which is found in Chapter 5 of the Draft EIR, is to determine whether an alternative program would avoid or substantially reduce the proposed project's environmental impacts. However, the range of alternatives studied generally provides a spectrum of possible projects for the Board of Supervisors to consider, which can generally be broken down into three possible alternatives.

One alternative is having no project providing wildlife damage management services whatsoever. This alternative is not recommended, as it provides no certainty as to how wildlife damage management will be handled in Mendocino County. The Agricultural Commissioner does not believe that an ad hoc approach to wildlife damage management is appropriate or

prudent, and would result in greater harm to both wildlife and humans and property in Mendocino County. Without an entity available to provide assistance, persons experiencing wildlife damage may resort to means that are more harmful to humans and wildlife, and may result in the loss of non-target species.

Another set of alternatives involve the adoption of a program, either lethal or non-lethal in nature, which would be operated by the County Department of Agriculture itself. One of the reasons that Mendocino County has previously contracted with Wildlife Services for the IWDM Program is that it is comparatively more cost effective and easier to administer than a program operated solely by the County. Hiring, training, equipping and administering two professionals, plus potential support staff, is not currently budgeted for by the Department of Agriculture and would likely be greater than the contract cost of the Wildlife Services program. Based on communications with Wildlife Services this year, the estimated annual cost would be approximately \$170,000. Employee salary and benefits alone for a County-operated program would likely exceed this figure.

A last alternative involves the adoption of a non-lethal program where the County would contract with an outside governmental or non-governmental agency that would provide personnel who would give technical and operational assistance to land owners or resource managers, but direct control assistance related to lethal methods would not be provided. It is not currently known what entities exist that would be qualified to undertake this type of program within Mendocino County, nor is it known how expensive or cost effective this program might be. Given the relative unknowns regarding this alternative, the Agricultural Commissioner would request direction from the Board of Supervisors to further research a program that could be presented to the Board for consideration.

However, in reviewing the above alternatives, the Agricultural Commissioner recommends that the Board of Supervisors select the IWDM Program as the method of providing wildlife damage management in the County. The IWDM Program has operational protocols that include providing non-lethal technical and operational assistance. In the experience of the Agricultural Commissioner in working with Wildlife Services in other counties in California, the IWDM Program provides an effective approach to wildlife damage management, meets the project objectives of the County, and is cost-effective for the County.

If the Board of Supervisors adopts the resolution prepared for its consideration, the Agricultural Commissioner would bring agreements with Wildlife Services for the IWDM Program to the Board for its consideration in 2020.