



Mendocino County Farm Bureau

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Affiliated with the California Farm Bureau Federation and the American Farm Bureau Federation

March 22, 2021

Via Email: bos@mendocinocounty.org

Mendocino County Board of Supervisors
501 Low Gap Road, Room 1010
Ukiah, CA 95482

RE: 6a) Discussion and Possible Action Including Direction to Staff to Author (1) a Resolution to Terminate Cooperative Services Agreement (CSA) with USDA Wildlife Services; and 2) a Resolution to Vest Administrative Responsibility for Implementation of the Mendocino County Non-Lethal Wildlife Damage Management Program with the Mendocino County Animal Care Services

Dear Chair Gjerde and Supervisors,

The Mendocino County Farm Bureau (MCFB) is a non-governmental, non-profit, voluntary membership, advocacy group whose purpose is to protect and promote agricultural interests throughout the county and to find solutions to the problems facing agricultural businesses and the rural community. MCFB would like to submit comments to oppose the direction to 1) terminate the cooperative services agreement (CSA) with the USDA Wildlife Services to implement the integrated wildlife damage management (IWDM) program for Mendocino County and 2) to Vest Administrative Responsibility for Implementation of the Mendocino County Non-Lethal Wildlife Damage Management Program with the Mendocino County Animal Care Services.

General Comments

The agenda background and supporting documentation for this agenda item is vague and generalized. The conceptual program for a wildlife exclusionary service administered through a combined animal care/control department does not provide enough detail to understand the intent and scope of this proposal.

In addition, it is apparent that there was a lack of effort to reach out to the existing IWDM program administrators to provide information related to the status of the program since being reinstated less than six months ago. In multiple presentations to the Board, Wildlife Services staff offered to provide data, answer questions, etc. It is frustrating to see this item come before the Board without any supporting documentation to defend the agenda item description that includes the direction to terminate the current cooperative services agreement with Wildlife Services.

MCFB would also like to ask why only one Supervisor's name is listed as the sponsor for this item since there was an Ad Hoc committee made up of both Supervisor Haschak and Supervisor Gjerde formed to research a supplementary wildlife exclusionary program. As presented, this item does not appear to be coming from the Ad Hoc committee.

Limited Services

As proposed, the animal care/control model is focused on a limited scope of service. The following are unknowns:

- It is unknown how many staff within this model would be dedicated to wildlife interaction issues.
- It is unclear as to what species of wildlife would be handled by county staff.

- It seems that the focus of this proposal is solely on exclusionary service for an urban environment. There is no discussion on how the animal control/care model would provide assistance for residents dealing with issues such as livestock predation, public health concerns or property damage (i.e., wild pigs).
- If animal care/control are performing exclusionary services, is there additional licensing (contractor) required to perform structural work on private residences or properties?
- There is not a solid timeline when this new model would be implemented or what a gap in service would look like
- Will the Sheriff's office be responsible for coordinating wildlife related calls or will wildlife concerns/complaints be handled by animal care/control?
- It is not clear on how the animal control/care staff assigned to this program will cooperate with other agencies such as CA Department of Fish and Wildlife, U.S. Fish and Wildlife Service and USDA Wildlife Services to resolve wildlife issues that are outside their scope of work or capabilities.

The scope of the current IWDM administered by USDA Wildlife Services provides wildlife assistance to a larger number of county residents through service to both urban, rural and agricultural interests. The USDA Wildlife Services program includes both technical assistance and direct control assistance that may use non-lethal methods, lethal methods or combinations of the two methods. The IWDM program, as certified in the county's EIR, allows for a suite of practices to be implemented as deemed necessary, for a broader number of wildlife species.

A county administered wildlife exclusionary service would be supplemental to the current USDA Wildlife Services IWDM program. It is not going to be an equitable replacement for the current program that is in place.

Program Costs

The proposed animal care/control model, as presented, does not elaborate on the overall anticipated costs for establishing and maintaining a county run wildlife exclusionary program.

Here is what was presented:

- With the added Wildlife Exclusion duties & responsibilities the salary for the Animal Control Officers & Supervisor will have be reviewed by Human Resources to see if a salary increase is warranted. This salary increase will also need to account for any changes to county pension contributions or related benefits.
- Animal Care Services would request an additional 4th Animal Control Officer be added due to the increased workload from Wildlife Exclusion calls for service and the large geographic size (3,878 square miles) of Mendocino County. Costs include salary, benefits, pension, etc.
- Cost of law enforcement training program would need to be built into program funding. There are no mention of any additional liability insurance needs to cover animal care/control staff carrying fire arms.
- The Ukiah Animal Shelter would require additional office space and infrastructure to house the animal control and wildlife exclusion programs.
- Additional vehicle purchase and maintenance costs for additional staffing
- Costs of MOU with Sonoma Wildlife for training and support
- Costs of upgrading cages and structures at animal care facility to house wildlife.
- A yet to be defined fee structure will be implemented for exclusionary services.

The Board needs to ask for a full financial analysis of what the above list of bullet points is anticipated to cost the county. It also needs to be mentioned that there has been a high turn over rate in staff within Animal Control. The investment in training needs to be considered as does the salary levels that are intended to be offered for the new position and/or positions that are given the wildlife management responsibilities. Using base salary estimates is most likely not an accurate reflection of cost.

The fee structure for the services provided for this proposal also need an honest conversation. Attachment A is the current fee structure from the Sonoma Wildlife, AWES: A Wildlife Exclusion Service, program. If comparable services are imagined, and comparable rates established, does the Board envision the typical urban resident in Mendocino County paying upwards of \$500 to assist with a skunk or racoon removal?

As a reminder, the cost share agreement with the USDA Wildlife Services allows for approximately 1/3 of the cost of the program to be covered by USDA and approximately 2/3 of the cost covered by the county. In addition, the County Agricultural Commissioner in the past has been able to utilize unclaimed gas tax reimbursement funds to assist in offsetting expenses to various programs including the IWDM program. MCFB defers to the Agricultural Commissioner for additional detail, but it is understood that for fiscal year 2021-22, unclaimed gas tax dollars could provide between \$75,882 and \$98,569 in coverage toward the counties 2/3 of the cost share agreement. This funding is not available for a service that is not administered through the Ag Department.

Prior to the litigation related to the county IWDM program, Mendocino County was applying a fee schedule through the Department of Agriculture for services provided by USDA Wildlife Services for IWDM implementation. These fees were reasonable for individual service calls or longer-term agreements (by month or annually) for larger ranches. The county Agricultural Department has a current fee structure in place that was reinstated when the most recent cooperative services agreement was implemented.

Board members have lamented on the costs of administering a cooperative services agreement with USDA Wildlife Services. So, a true cost comparison to this proposal is warranted.

Comparison to Other Counties

As a reminder, in Sonoma County, Sonoma County Wildlife Rescue is not the ONLY program that provides services related to wildlife interaction. The County of Sonoma also has 1.5-1.75 county employed staff, through the department of agriculture, that administer an IWDM with both non-lethal and lethal practices. Following threat of litigation (by the same entities that threatened and then sued Mendocino County), Sonoma County transitioned from a USDA Wildlife Services cooperative services agreement to a county employee-based program. The county staff focus on predator/livestock related responses and no urban or public health responses. The expenses are close to \$200,000 (per 2019 numbers) to cover the cost of salary and benefits. Additional equipment, training and liability insurance costs are not included in this figure.

Sonoma County Wildlife tends to focus on the urban need of exclusionary work and wildlife rehabilitation. It is a supplemental program to contend with the urban wildlife interaction issues seen in Sonoma County.

Since the Marin County livestock protection program is often cited as an alternative for a USDA APHIS WS administered IWDM program, MCFB felt it was worth reiterating the following information.

- On P.3-3 of the draft EIR, the project location and description states that, *“Mendocino County is generally located along the California’s west coast and contains 2,246,000 acres, or 3,510 square miles, and is the 15th largest county in California in terms of land area. About one-fifth of the land in Mendocino County is in public ownership, controlled by a variety of federal, state and local government agencies. The rest of the land in the County (almost 80%) is in private ownership; about three-fourths of all privately held land is committed to long-term agricultural or timber uses.”*

By contrast, Marin County has a land area of only 520 square miles¹ and is the 4th smallest county in California. This is roughly 15% of the land area of Mendocino County.

¹ <https://www.census.gov/quickfacts/marincountycalifornia>

- The Marin program focuses on livestock protection and negates the other components of an IWDM program such as public health, property damage or urban wildlife issues.

In the 2019 Marin County Crop Report² it is stated, “*Over the past year, 15 ranchers participated in the Livestock Protection cost-share program to help build and repair fences, purchase and support protection animals, and use scare devices to protect animals from predators. Protected animals include sheep, poultry, goats, cattle, buffalo, and alpaca. The total funds expended to support our ranching community from July 2019 to June 2020 was \$29,682.*”

In 2017³ (last full year of data), the APHIS WS-CA IWDM program assisted 380 individuals in Mendocino County with 207 consultations on 20 species of wildlife.

County Resident Driven vs. Non- Resident Driven

The entities that have been threatening the county with litigation, repeatedly, over the past 5+ years are not local. Look at the letters received for this item. Most are not local. There is an agenda that has not changed.

The county has successfully developed and defended the EIR for the IWDM program. As recent as February 9, 2021, the Mendocino County Superior Court concluded in Case No. SCUk CVG 20-73782 (Project Coyote and Mendocino Nonlethal Wildlife Alliance vs. Mendocino County), that, “*Based on the reasons set forth above, the petition for writ of mandate is denied. The court finds that the County proceeded in the manner required by law and that the EIR was supported by substantial evidence.*” Since the CEQA challenges have failed, this item proposal seems like a political end run toward the same goal.

As the Board of Supervisors reviews the comments for agenda item 6A, MCFB asks that consideration be prioritized for comments received by those who would be directly impacted by a decision related to the future implementation of the service agreement with USDA Wildlife Services and the related IWDM program in the county.

The proposed exclusionary wildlife program has not been fully thought through in terms of limitations, costs or level of service provided. MCFB does not feel that the Board direction to investigate the wildlife exclusion supplement, not replacement, to the existing cooperative service agreement with Wildlife Services and IWDM program has been adhered to. Therefore, we are in opposition to the recommended actions for this item to 1) Terminate the Cooperative Services Agreement (CSA) with USDA Wildlife Services; and 2) to Vest Administrative Responsibility for Implementation of the Mendocino County Non-Lethal Wildlife Damage Management Program with the Mendocino County Animal Care Services. If the county wants to have a broader conversation about the county IWDM program, MCFB welcomes the opportunity to discuss further.

Sincerely,



George Hollister
President, MCFB

² <https://www.marincounty.org/-/media/files/departments/ag/crop-reports/2019-marin-crop-livestock-report.pdf?la=en>

³ 01/01/2017-12/31/2017 TA/Outreach by species summary provided by APHIS WS-CA

Attachment A



PRICES

SERVICE	PRICE
Service Call	\$115-230 depending upon city - see below table (includes \$30 admin fee)
Each return trip (to remove doors, deal entry points, etc.)	\$57.50-\$100 Depending on service address
Basic Sub Floor Inspection	\$150 - Those requiring more than one hour will be charged an additional \$50 per hour
Basic Attic Inspection	\$150 - Those requiring more than one hour will be charged an additional \$50 per hour
1st Story Roofline Inspection	\$150 - Those requiring more than one hour will be charged an additional \$50 per hour
2nd Story Roofline Inspection	\$150 - Those requiring more than one hour will be charged an additional \$50 per hour
Dead Animal Removal	\$50-\$200 depending on the situation
Feces Removal	\$200 per hour
Live Animal Removal	\$70-\$200 per hour depending on situation
One Way Door Rental	\$75 including installation and materials
One Way Door Removal	\$50 - Labor to remove door and seal off entry points
Labor	\$100-\$200 per hour, per person, and depending upon situation
Predator Scent Scat	\$40 - quart sized bag \$100 - gallon sized bag
Predator Scent Straw	\$30 per bag
Materials	Depends upon situation
Other Services	Depends upon situation

Cost for First Inspection	City
\$115 0-.5 hour drive	Cotati, Petaluma, Santa Rosa, Rohnert Park, Sebastopol
\$140 .5 hour to 1 hour drive	Glen Ellen, Sonoma, Healdsburg, Windsor, Monte Rio, Boyes Hot Springs, Guerneville, Forestville, Bodega Bay, Oakmont
\$165 1- 1.5 hour drive	Calistoga, Camp Meeker, Saint Helena, Cloverdale, Geyserville, Yountville
\$230 1.5-2 hour drive	Elk, Philo, Lake County, Sea Ranch

A Wildlife Exclusion Service • 403 Mecham Rd, Petaluma 94952 • (707) 992-0276