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Board of Supervisors – Mendocino County
501 Low Gap Road, Room 1010
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Chair Dan Gjerde and Supervisors:

I am writing in regard to **Agenda Item 6a**, dealing with wildlife damage management in Mendocino County. I oppose the possible recommended action to terminate the Cooperative Services Agreement with USDA Wildlife Services and to establish a non-lethal wildlife damage management program with Mendocino County Animal Care Services.

My opposition is grounded in 36 years of professional experience in teaching and researching human-wildlife conflicts. To understand my viewpoint, I respectfully ask that you read the brief attachment to this letter, an article by Professor W. E. Howard of U.C. Davis entitled "How Animal Control Improves Animal Welfare."

Advantages of continuing the agreement with USDA Wildlife Services (WS) include the following:

- WS personnel are professionals in wildlife damage management whose training is updated on a continuing basis and is informed by recent and current research conducted by the USDA National Wildlife Research Center.
- The USDA WS program in California is supported by federal funds on a cost-share basis.
- WS personnel have access to tools and technologies not available to the general public.
- Since no one individual can specialize in all areas of wildlife damage management, field personnel can rely on support from a network of colleagues throughout the USDA WS organization.
- WS personnel can and do provide advisory recommendations to landowners, homeowners, and many types of clientele, and when called upon to do so can conduct operational control methods to solve human-wildlife conflicts in a timely manner.

The situations in which mammals, birds, and occasionally reptiles and amphibians, come into conflict with human endeavors in California are very diverse. Solving such conflicts often involves melding a variety of tools and methods into a tailored strategy appropriate for the situation (i.e., Integrated Pest Management, or "IPM"). For example, see the report of Bangs et al. (2006), describing a management strategy in which a wolf population was restored, the risk of livestock damage reduced, and public tolerance of wolves improved through an integrated program of proactive and reactive non-lethal and lethal control tools.

Most people, myself included, desire to solve such conflicts without killing animals or harming non-target species. The reality is that for some situations and animal species, lethal tools are necessary.

Disadvantages of a strictly non-lethal approach include the following:

- Non-lethal techniques such as exclusion may be impractical for problems such as coyote or feral dog predation on livestock, especially on large acreages or grazing lands. For further detail, see my previous letter to the Board with attachments (dated Dec. 16, 2019). WS is commonly called upon to provide lethal assistance where potentially viable non-lethal methods are in place but fail to prevent losses (see May 1996). Further, there are no effective or practical non-lethal methods to deal with some of our region's most damaging native rodents (e.g., pocket gophers, ground squirrels, or voles in or adjacent to vineyards, orchards, and agricultural crops).
- To stop wildlife damage in a timely manner may necessitate removal of the offending animal(s); hazing efforts to scare away the animal(s) are inconsistent in effectiveness, and live-trapping and

relocation of animals is not allowed by California Department of Fish & Wildlife policies, with few exceptions.

- Ridding a structure of pest animals (e.g., rats, mice) is a necessary first step before making building modifications to prevent re-entry, but animal removal usually requires use of kill traps, or live traps accompanied by humane euthanasia.

The limitations imposed on wildlife damage management by restricting methods solely to non-lethal tools (exclusion, chemical repellents, hazing, etc.), as noted above, will leave some clientele without timely and effective solutions for their problems. When unable to obtain assistance, it's human nature for some people to invent their own remedies. This is made easier by the public's ability to buy almost anything, including toxic rodent baits and other pesticides, via the Internet. This source of materials is almost entirely unregulated at the state and federal level. Some materials available originate from outside the U.S., are illegal for use in California or in the U.S., and some are unlabeled, mislabeled, or even counterfeit. Thus, in their desperation, people are driven to using, inventing, or repurposing techniques or materials that are hazards to themselves, domestic animals, or to non-target wildlife. It's likely that some unskilled landowners or homeowners will continue to use kill traps in a non-selective manner, and this will undoubtedly result in the killing of more non-target animals.

I am also concerned that placing wildlife damage management and animal control under the same leadership within County government will create internal philosophical conflicts that will negatively impact the operation of the unit. This is because animal control agencies typically deal with domestic animals, leading the staff (as well as the public) to focus efforts toward the welfare of *individual animals*. Conversely, wildlife management focuses on the health and welfare of *wildlife populations* and ecosystems. This distinction is often not understood by the public; see the attached article by Howard (1990). Further, an animal control program for feral domestic animals and wildlife that does not have exceptions that include euthanasia may restrict the ability to respond to public health crises that involve diseases vectored from animals to people. For example, see Cummings et al. (2014), where failure to control feral cats and non-native opossums in Orange County is implicated in a substantial increase of human cases of murine typhus in humans.

It is my hope that decisions made regarding the future of our citizens' ability to obtain information and assistance with wildlife damage problems, which are increasing throughout California in recent decades, will rely on the best available science and proven management strategies.

Sincerely,



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References cited above

May, J. Alan. 1996. Results of a Non-Lethal Survey and Report Provided to the New Mexico Legislature. Proceedings of the Vertebrate Pest Conference 17:225-229. <https://escholarship.org/uc/item/2kh0580j>

Bangs, E., M. Jimenez, C. Niemeyer, et al. 2006. Non-Lethal and Lethal Tools to Manage Wolf-Livestock Conflict in the Northwestern United States. Proceedings of the Vertebrate Pest Conference 22:7-16. <https://escholarship.org/uc/item/4vq5p9hs>

Cummings, R. L. Krueger, K. Nguyen, et al. 2014. The Conflicting Roles of Vector Control and Animal Control Agencies in Mitigating the Rise of Human Cases of Flea-borne Typhus in Orange County, California. Proceedings of the Vertebrate Pest Conference 26:316-322. <https://escholarship.org/uc/item/5rp962mh>

HOW ANIMAL CONTROL IMPROVES ANIMAL WELFARE

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ABSTRACT: The balance of nature requires a balanced predator-prey relationship. In agriculture or urban areas the natural predator-prey balance is disrupted because the habitats have been altered and, for the protection of livestock (and for humans in case of grizzly bears, lions, and wolves), the large carnivores have usually been displaced. Consequently, in these altered environments to prevent crop depredations, to keep other vertebrate species in balance with their environment, and to protect some endangered species, people must manage the wildlife. This often means that for the welfare of animals people have to become predators to assist nature. Fortunately, from an animal welfare point of view, people are usually a more humane predator than nature because they operate under regulations designed to minimize suffering. While animals and their antics can be beautiful, the way predators capture and kill prey is often inhumane and brutal. Therefore, animal control operations, as currently undertaken with rodents, birds, and predators, frequently play both a beneficial and a humane role. Without such controls, there is often much more suffering through starvation, disease, etc. Also, much animal damage control is pest prevention, thus reducing the former need for toxic chemicals and lethal approaches.

Proc. 14th Vertebr. Pest Conf. (L.R. Davis and R.E. Marsh, Eds.)
Published at Univ. of Calif., Davis. 1990.

This paper is concerned with how animal control activities reduce conflicts and create a more harmonious relationship between people and animals. By definition, we can only have pests where people are involved. Vertebrates become pests when they compete in some way with people or otherwise become an annoyance. This occurs when man attempts to use a modified habitat still occupied by wildlife to provide himself with food, fiber, other resources, a desired lifestyle, or to avoid public health problems. For people and animals to coexist reasonably harmoniously requires an understanding of how nature can be balanced in human-modified environments, such as agricultural or metropolitan areas. The key issue is that we are dealing with modified environments, which is inevitable if people are present. Animal damage control (ADC) becomes an integral part of establishing new and tolerable balances.

To provide harmony and reasonable stability in modified environments, it is essential that people assist nature in maintaining new and acceptable balances. But, at the same time, we must recognize that all nature's animals, wild or domestic, have legitimacy and value and deserve humane treatment. In wildlife management the infliction of unnecessary pain and suffering should never be tolerated.

A zealous "animal protectionist" ethic is, under most instances, unsound biologically. Conservationists need a wildlife management ethic, not based on emotionalism, but on the laws of nature, which includes animal damage control. Since early man, animal damage control has been an integral part of life and is part of the true harmony between man and nature, just as has been the exploitation of animals and plants for food.

Animal damage control is applied ecology, and the approaches used are varied, often involving frightening, exclusion, and cultural methods as well as the use of repellents or various types of biological control. Lethal methods, e.g., shooting, kill-trapping, and toxic chemicals are also used for reducing pest populations, because sometimes they are the only economical and practical solutions, e.g., with many species of rodents and some livestock predators and birds.

In this country, wildlife is a resource belonging to the public. There is a need for better management approaches that consider today's environmental and social sensitivity. The

animal rights movement has contributed to the increased concern about animal welfare. Without a good scientific basis, it has had the positive value of making people more conscious of the welfare of animals. This group, whose activities are often illegal, life-threatening, and counter productive, is comparable to professional crusaders. They thrive on anti-intellectualism and being anti-establishment, and too often their activism is extreme. Animal rightists have been quite successful in their goal of making the wearing of fur seem vulgar and a symbol of someone who is uneducated, tasteless, and uncaring. They have done this by using emotionalism and ignoring biology. Many of the donations to animal rights groups are now "conscience" money.

People are part of nature and must therefore be accommodated as with all forms of life. To survive, they must utilize the environment, as all organisms must. Skins, furs, and all wildlife are a renewable natural resource. Fortunately, under proper management we cannot only assist nature in utilizing the environment, but can do it more humanely. But, unfortunately, man's appetite for resources and material things is devouring the earth's fauna, flora, and ground water, leaving polluted air, water, and soil in a plundered planet. The world cannot support an ever-increasing human population armed with such potent destructive technology and human desires for even more materialism. We must become better caretakers of wildlife and improve our stewardship of the environment, or face an inevitable future catastrophic collapse. We desperately need a sensible environmental ethic in the national conscience that is consistent with the laws of nature.

For the majority of species, nature's balancing process includes a high premature mortality rate. Nature's food web is based upon everything feeding on other species and often in turn being consumed. Meat eaters are essential to the natural system. Pain and suffering are an integral part of nature, brought about by evolution and the survival-of-the-fittest process. However, even though we are part of nature, we should make the lethal management methods and tools as humane as we can, yet still play the essential role of a predator when necessary. In the case of nonpest game species, the harvesting of the surplus animals that otherwise would damage the environment and the species' own welfare is consistent with conservation goals and is good ADC

practice. Unfortunately, in order to be more humane to an entire population of that species, it is often necessary to cause some animals to suffer.

Living in reverence of all life necessitates a clear understanding of nature's survival-of-the-fittest death ethic. Suffering is inescapable. The ADC goal is to keep suffering to a minimum. What is nature and the quality of life? All organisms are programmed to overproduce in order to survive and to oblige nature's food web. Nature's death ethic is what the balance of nature is all about. Sometimes our sense of moral responsibility and conscience guide us against nature's way. But to go against nature's system just to accommodate our own emotions often means we will not be demonstrating compassion for individuals or populations of a species. Interfering with nature's death ethic, like translocating a displaced mammal, may make our conscience feel better, but this warm feeling we experience inside may not be an expression of true compassion and, in the end, may cause more animal suffering than would otherwise have occurred.

It is not easy to develop strict guidelines that are consistent with stringent moral and ethical principles. With pets, domestic animals, and captive furbearers, is it better for them not to have been born and live a healthy safe life just because most may have to die prematurely, even though they will die more humanely than in nature? Domestic species are genetically programmed to depend upon humans for their existence. How can an animal miss a freedom it has never experienced? Most of the mammals people see every day would not have been born if they had not been wanted, and many game species would be extinct or nearly so if sportsmen's organizations had not saved them. Modifying habitats produces ecological misfits that can be saved only through management schemes. If nature's ways are so wonderful, are we wrong in not letting game populations, pets, and domestic animals experience life-threatening starvation, diseases, climatic extremes, intraspecific fighting, exposure to predators, and other stresses common to their wild counterparts?

A philosophy that emphasizes protection of all animals will often be contradictory to the necessities for quality of life of those animals. Compare the quality of life of underharvested animal populations, whether wild or domesticated, with those managed properly. "Bambi-ism" can be very cruel to animal populations. The recent surge of emotionalism about animal rights has misguided many dedicated and sincere people about the laws of nature. What is pain when it is the consequence of a volunteered act, e.g., boxers, football players, cock fighting, dog fighting, sexual combat, etc., of many species willing to invite conflict that is certain to be painful or even result in death? Animals in the wild do not have morphine, euthanasia, or humane slaughter as do laboratory and farm animals.

Coyotes and other predators of domestic animals must have their populations managed by hunters or others, for humane reasons, to protect domestic animals that no longer possess their ancestral abilities to escape such predation or to defend themselves. Most people agree that native predators should not be eliminated but be maintained to help balance the ecosystems, and preserve biological diversity. Therefore, it should be obvious that when we modify an environment

and remove the top carnivores such as grizzly bears, lions, and wolves, for human safety and the protection of livestock, people must then serve as a predator to help nature's system. It is interesting how most people condone the natural brutality of nature's predators cruelly feeding upon fairly helpless prey but object to ADC staff or hunters humanizing these events, even when the need for such predation is the consequence of our modifying the environment, thus increasing the unnatural exposure of the prey species.

Is it kind to let the protected wolves in Minnesota attain a density where some will kill cows, only then to be killed for carrying out their natural acts? We should be careful about permitting large carnivores and domestic animals coming into close proximity with each other when human predators can usually prevent such carnivore densities. Even if a rancher in Minnesota observes a wolf feeding on a partially born calf, he cannot shoot the endangered predator and must wait for a depredation permit or profession ADC personnel. Human predation operating under regulations can often be considerably more humane than this type of natural predation.

Once a species becomes a legal game animal, the populations of this species usually live healthier lives (until hunted or trapped) because of licensing regulations paid for by sportsmen. Where feasible, hunting is a good ADC option. Legal hunting and trapping do not cause extinctions; rather, more than any other source these activities have provided the funds to preserve habitats, hire wardens to protect animals, and pay for biologists to ensure that healthy populations are sustained. Wildlife are impacted far more by human activities than hunting or trapping. Shooting and much trapping are more humane than the harvesting of populations by cannibalism, starvation, or disease.

Once people modify an environment, they have a moral obligation to help nature regulate the balance of nature. Since we can respond to wildlife's needs in altered environments more effectively and rationally than can nature, we must be willing to serve as a predator when it is necessary. Modern animal damage control, even by lethal methods, nearly always treats the pest animals more humanely than nature does, but much more research is needed to make the control methods and materials even more humane. In modified environments the choice is ours: let a survival-of-the-fittest new balance evolve, or help nature by managing the species and the habitat, even if it means being a predator to replace those displaced. ADC does this. Few people recognize that virtually no agricultural crop, reforestation, or home landscaping could survive economically or aesthetically with free-ranging native mammals.

Where rodents, such as pocket gophers, ground squirrels, or meadow mice are a perennial agricultural or forestry problem and cannot be tolerated, permanent preventive control is the humane thing to do. As with commensal rodents, it is much kinder to locally eliminate these species where or when they cannot be tolerated and then monitor the species to ensure that no new population develops that will need a lot of control activity. ADC prefers the humane way of preventing problems from developing rather than being forced to eliminate large numbers of individual animals to resolve a conflict.