



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Northern Region
601 Locust Street
Redding, CA 96001
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



Governor's Office of Planning & Research

November 15, 2019

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STATE CLEARINGHOUSE

Paul Hellman, Director
Shasta County Department of Resource Management
1855 Placer Street, Suite 103
Redding, CA 96001

Subject: Review of the Notice of Preparation for the Cooperative Service Agreement and Annual Work/Financial Plan Between Shasta County and U.S. Department of Agriculture Animal and Plant Health Inspection Service – Wildlife Services Draft Environmental Impact Report, State Clearinghouse Number 2019100323, Shasta County

Dear Mr. Hellman:

The California Department of Fish and Wildlife (Department) has reviewed Notice of Preparation of the Draft Environmental Impact Report (DEIR) for the above-referenced project (Project). As a trustee for the State's fish and wildlife resources, the Department has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants and their habitat. As a responsible agency, the Department administers the California Endangered Species Act and other provisions of the Fish and Game Code that conserve the State's fish and wildlife public trust resources. The Department offers the following comments and recommendations on this Project in our role as a trustee and responsible agency pursuant to the California Environmental Quality Act (CEQA), California Public Resources Code section 21000 et seq.

The Department's Region 1 Wildlife Management Program considers Shasta County and the Animal and Plant Health Inspection Service – Wildlife Services (APHIS-WS), through their Cooperative Service Agreement, to be valuable partners. The Department works closely with APHIS-WS wildlife specialists in Shasta County to investigate reports of human-wildlife conflict and to assist people with wildlife-related property damage. Additionally, APHIS-WS specialists are also able to occasionally help the Department respond to reports of injured wildlife and diseased wildlife. The Department appreciates this opportunity to comment relative to impacts to wildlife species.

Project Description and Location

"The proposed project is the establishment and implementation of a five-year Cooperative Service Agreement (CSA), including annual work plans (work and financial plans) required by the five-year CSA, between Shasta County and U.S. Department of Agriculture (USDA) Animal and Plant Health Inspection Service – Wildlife Services (APHIS-WS) for wildlife damage management assistance in the County. Project activities would be

implemented in the unincorporated area of the County. The overall goal of the proposed project is to ensure that wildlife damage management in Shasta County for purposes of protecting agricultural resources (including livestock and bees), public health and safety, and property is performed in a biologically sound, environmentally safe, and accountable manner and in accordance with applicable federal and state laws and regulations."

Comments and Recommendations

The Department offers the following comments and recommendations on this Project in our role as a Trustee and Responsible Agency.

On page 8 of the Initial Study, dated April 2019, it states APHIS-WS uses lethal methods but only "*as a last resort when other methods of control have not been successful.*" It is the Department's understanding that lethal methods are sometimes employed without first employing non-lethal methods. The Department recommends this section be clarified in the DEIR.

Page 9 indicates immediate take of wild pigs "*by the permit holder*" is allowed when the animal is harming or threatening to harm property. Fish and Game Code section 4181.1 authorizes take without a permit in such situations. The person taking the wild pig shall report the taking no later than the next working day to the Department and shall make the carcass available to the Department. The Department recommends removing "*permit holder*" from this sentence.

On page 14, it states, "*Appropriate notification signs must be posted within the direct line of sight of mountain lion foot-snare device sets.*" The Department was not aware such snares are used for mountain lions in Shasta County. If they are used, please discuss how frequently they are deployed in the subsequent DEIR.

Table B-2A (also referred to as Table B-1), Shasta County Threatened and Endangered Species, does not show gray wolf (*Canis lupus*), federally and State listed as endangered. Although Shasta County does not have resident gray wolves, several collared wolves have spent time in the county, and the Department has also seen evidence of uncollared wolves in county. The Department anticipates that gray wolves will likely continue to use Shasta County. Page 17 indicates APHIS-WS cannot implement activities that would purposefully or incidentally result in take of a protected species without authorization from applicable resource agencies. Because gray wolves could potentially be trapped in a snare or trap set for targeted species, the DEIR should address those potential impacts.

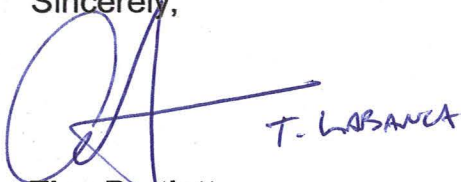
Attachment A, page A-20 states, "*Trapping regulations for California are specified in Section 465.5 of the California Fish and Game Code, and County-funded APHIS-WS activities in the County must adhere to those regulations.*" Section 465.5 is in Title 14

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CCR section 465.51. The Department recommends all statutes, regulations, sections, etc. be verified prior to the DEIR going public.

If you have any questions, please contact Pete Figura, Wildlife Management Supervisor at (530) 225-3224, or by e-mail at Pete.Figura@wildlife.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to be 'T. LABANCA' or similar, written over a large, stylized initial 'A'.

FOR **Tina Bartlett**
Regional Manager

ec: Paul Hellman, Director
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¹ Barclays Official California Code of Regulations Title 14. Natural Resources Division 1. Fish and Game Commission-Department of Fish and Game Subdivision 2. Game, Furbearers, Nongame, and Depredators □ Chapter 5. Furbearing Mammals (Refs & Annos), § 465.5. Use of Traps.