

Summary Form for Electronic Document Submittal

Form F

Lead agencies may include 15 hardcopies of this document when submitting electronic copies of Environmental Impact Reports, Negative Declarations, Mitigated Negative Declarations, or Notices of Preparation to the State Clearinghouse (SCH). The SCH also accepts other summaries, such as EIR Executive Summaries prepared pursuant to CEQA Guidelines Section 15123. Please include one copy of the Notice of Completion Form (NOC) with your submission and attach the summary to each electronic copy of the document.

SCH #: 2020099012

Project Title: California Wildlife Damage Management

Lead Agency: California Department of Food and Agriculture

Contact Name: Dr. Annette Jones

Email: annette.jones@cdfa.ca.gov Phone Number: 916-445-0444

Project Location: Statewide
City *County*

Project Description (Proposed actions, location, and/or consequences).

See attached

Identify the project's significant or potentially significant effects and briefly describe any proposed mitigation measures that would reduce or avoid that effect.

See attached

If applicable, describe any of the project's areas of controversy known to the Lead Agency, including issues raised by agencies and the public.

Predator control, Trophic cascade, and effects on biological diversity
Risks to threatened and endangered species (poison baits, lethal traps)
Impacts on Native American tribes, culture, and resource uses
Impacts related to hazards and hazardous materials (pesticides)
Risks and benefits to human and companion animal safety
Consider and evaluate the humaneness of lethal methods/activities on animals
Evaluate how techniques impact non-target species and nearby human populations, including sensitive receptors
Discuss mitigation measures to address potential contamination (water quality/public drinking water)

Provide a list of the responsible or trustee agencies for the project.

California Department of Fish and Wildlife
State Lands Commission
California State Parks
University of California

Executive Summary

Wildlife provides many benefits, including ecological, cultural, aesthetic, and economic. However, they also may be involved in conflicts with humans by preying upon livestock, damaging agricultural resources and property, and threatening human and companion animal health and safety. Wildlife damage management (WDM) in California is necessary to resolve these conflicts. This joint Environmental Impact Report/Environmental Impact Statement¹ (EIR/EIS) reviews the environmental impacts of the Proposed Project/Proposed Action and variety of alternatives for responding to requests for assistance with WDM including the cessation of current California Wildlife Services (WS-California) WDM activities. Requests for assistance may come from many sources including private groups or individuals; other federal, state, and local agencies; and Native American Tribes. The Proposed Project/Proposed Action and five alternatives considered in this EIR/EIS evaluate and compare varying degrees of WS-California, the California Department of Food and Agriculture (CDFA), and California County wildlife specialists' involvement in WDM.

Objectives

The CDFA and WS-California have each identified objectives for their respective programs. The programs are explained in more detail in Chapters 1 and 2.

The CDFA has identified the following objectives:

- Align with the historic (i.e., pre-2003) CDFA program objectives.
- Accomplish the following additional WDM Program objectives:
 - Inform the implementation of WDM activities conducted by state and local agencies throughout California.
 - Provide rapid response to high-risk wildlife damage scenarios in order to prevent harm to agricultural resources and property, human health and safety, and natural resources.
 - Support the development and implementation of measures to avoid, minimize, and mitigate unintended impacts to California's important natural resources from WDM materials and technologies.
 - Build upon existing resources, including WS-California's data reporting system, to develop a statewide information management, reporting, and data sharing system for wildlife damage incidents and management activities that will allow a robust evaluation of management activities to support an integrated and adaptive WDM approach.
 - Establish an administrative mechanism for California Counties (Counties) that wish to participate in a statewide WDM Program to facilitate their environmental compliance.

WS-California has identified the following objectives:

- Respond in a timely and appropriate way to all WDM requests for technical and/or operational assistance, whether from private or public sources.
- Implement an integrated WDM approach which incorporates biological, legal, economic, environmental, cumulative, and sociocultural factors.

¹ The EIS portion of this joint document will proceed under the 1978 National Environmental Policy Act (NEPA) regulations and existing Animal and Plant Health Inspection Service (APHIS) procedures since this document was initiated prior to the September 14, 2020 NEPA revisions.

- Comply with all applicable federal, state, and local laws; Wildlife Services policies and directives; cooperative agreements; MOUs; and other legal requirements, as feasible.
- Develop and improve lethal and non-lethal strategies to promote the most effective, target-specific, and humane remedies available given legal, environmental, and other constraints.
- Coordinate with the management goals and objectives of applicable WDM plans or guidance as determined by the jurisdictional state, tribal, or federal wildlife or land management agency.

Proposed Project/Proposed Action and Alternatives

WS-California currently uses an integrated approach to WDM involving access to the full range of legally available non-lethal and lethal WDM methods to optimize WDM. For this EIR/EIS five alternatives were developed. The alternatives are explained in more detail in Chapter 3.

Proposed Project/Proposed Action: CDFA WDM Program/Continuation of WS-California including Emergency/Rapid Response

Under the Proposed Project/Proposed Action, the CDFA would have a new role in statewide activities, formalizing a program that provides an adaptive and integrated approach, cooperator/requestor participation, technical assistance on lethal and non-lethal techniques, and/or lethal and non-lethal operational WDM assistance that is similar to WS-California's existing WDM activities. As part of the Proposed Project/Proposed Action, the CDFA would also be a centralized data repository for integrated WDM activities (coordination and documentation review), participate in education and outreach, enact a rapid response plan for emergency WDM incidents and/or infestations, and conduct analysis of independent County integrated WDM programs (note that WDM activities of more limited scope could be delegated to individual counties by the CDFA, responding to their specific needs).

Under the Proposed Project/Proposed Action, WS-California would continue to provide technical assistance on lethal and non-lethal WDM techniques and/or provide lethal and non-lethal operational WDM assistance. Similarly, the Proposed Project/Proposed Action would include WS-California T&E species protection and wildlife hazard management (WHM) at airports.

Alternative 1: No Project/Continuation of WS-California

Under Alternative 1, no new CDFA or county WDM would be established. This alternative would not include any CDFA or county-led emergency/rapid response activities. WS-California would continue to operate WDM. This would include T&E species protection and airport WHM. Components of this alternative include collaboration and identification, education and training, technical assistance, non-lethal and lethal operational WDM, and monitoring. WS-California could also loan equipment to cooperators/requestors for WDM activities.

Alternative 2: Non-Lethal Operational WDM, Except for Human/Companion Animal Health and Safety, Threatened and Endangered Species Protection, and Airport WHM

Under Alternative 2, the CDFA/Counties/WS-California would provide technical assistance on lethal and non-lethal techniques and/or provide non-lethal operational WDM assistance, but would not provide lethal WDM assistance, except for cases of human health and safety, companion animal health and safety, T&E species protection, and airport WHM. Components of Alternative 2 include collaboration and identification, education and training, technical assistance, non-lethal operational WDM, and monitoring. The CDFA/Counties/WS-California could also loan

equipment used for non-lethal techniques and/or other WDM activities. Alternative 2 could include CDFA/County/WS-California emergency/rapid response activities.

Alternative 3: Non-Lethal Operational WDM

Under Alternative 3, the CDFA/Counties/WS-California would provide technical assistance on lethal and non-lethal techniques and provide only non-lethal operational WDM assistance. No lethal operational WDM assistance would be provided. Components of Alternative 3 include collaboration and identification, education and training, technical assistance, non-lethal operational WDM, and monitoring. The CDFA/Counties/WS-California could also loan equipment used for non-lethal techniques and/or other WDM activities. Alternative 3 could include CDFA/County/WS-California emergency/rapid response activities, but no lethal methods.

Alternative 4: Financial Reimbursement Assistance

Alternative 4 is for CEQA consideration only. Under Alternative 4, participating counties could establish an assistance program or cost-sharing initiative that provides monetary compensation to affected cooperators/requestors (producers), with a focus on funding improved protection from damaging wildlife (e.g., upgrade of fencing, acquisition of guard animals). This alternative would not include operational assistance provided by the CDFA/WS-California. This alternative would not preclude the right of private entities to conduct lethal WDM on their own in accordance with state and federal laws.

Alternative 5: No Action/Cessation of WS-California

Alternative 5 would not establish or formalize a CDFA WDM Program in California. Nor would any technical or operational assistance with WDM methods described under the Proposed Project/Project Action and Alternatives 1, 2, and 3 (and included as Appendix C) be conducted by WS-California. Furthermore, no provision of financial reimbursements as described in Alternative 4 would be provided. Under Alternative 5, potential WDM would be handled by other entities, including but not limited to tribes, the USFWS, the CDFW, Counties, private-resource owners and managers, private contractors, and/or other non-federal agencies.

Environmental Impacts/Effects

The California Environmental Quality Act (CEQA) requires that an EIR define a “threshold of significance” for each impact that may occur to the physical environment. A threshold of significance, or significance criterion, is an identifiable quantity, quality, or performance level of a particular environmental impact. In general, potential impacts are identified as either potentially significant (above threshold) or less than significant (below threshold). For the purposes of the EIR, significance criteria were drawn from the CEQA Guidelines, Appendix G, Environmental Checklist Form (California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000–15387 et seq.). Several thresholds of significance were also developed in addition to the Appendix G thresholds of significance in an effort to fully analyze the impacts of the Proposed Project/Proposed Action on the identified resource topic areas.

The EIS considers the potential direct, indirect, and cumulative effects of WDM activities on the human environment. As defined by National Environmental Policy Act (NEPA) implementing regulations, the “human environment shall be interpreted comprehensively to include the natural and physical environment and the relationship of people with that environment” (40 CFR 1508.14). Therefore, when a federal agency analyzes its potential impacts on the “human environment,” it is reasonable for that agency to compare not only the effects of

the proposed federal action, but also the potential effects that could or would occur from a non-federal entity conducting the action in the absence of the federal action.

The Proposed Project/Project Action and the five alternatives were compared as to the effects on seven issues. The issues were identified based on WS-California and the CDFA experience, agency and tribal outreach, and from public scoping. The issues are explained in more detail in Chapter 4. The issues included for comparative analysis are:

1. Agriculture and Forestry Resources (Section 4.2.1)
2. Biological Resources (Section 4.2.2)
3. Tribal Cultural Resources (Section 4.2.3)
4. Hazards and Hazardous Materials (Section 4.2.4)
5. Human and Companion Pet Health and Safety (Section 4.2.5)
6. Noise (Section 4.2.6)
7. Public Resources (Section 4.2.7)

Agricultural and Forestry Resources

The EIR/EIS identifies the following agricultural and forestry resources that could be affected by the Proposed Project/Proposed Action and Alternatives: croplands, rangelands, orchards, vineyards, nurseries, timberlands, and urban forests. Alternative 5 would have significant and unavoidable adverse impacts under CEQA and significant impacts under NEPA on the market value of agricultural and forestry resources sold in California, agricultural employment, and agricultural income/earnings due to increased wildlife damage. Other agricultural and forestry resources thresholds of significance would have less than significant impact under CEQA and not significant impacts under NEPA. The Proposed Project/Proposed Action would have beneficial impacts on the market value of agricultural and forestry resources sold in California, agricultural employment, and agricultural income/earnings due to decreased wildlife damage and no impacts under both CEQA and NEPA on other agricultural and forestry resources thresholds of significance. Alternatives 1, 2, 3, and 4 would have no impact or less than significant impacts under CEQA and no impact or not significant impacts under NEPA on agricultural and forestry resources thresholds of significance.

Biological Resources

The EIR/EIS identifies a number of native wildlife species that could potentially be impacted by the Proposed Project/Proposed Action. There are seven Appendix G thresholds for biological resources that cover the following topics: habitat modification and candidate, sensitive, and special status species; riparian habitats; protected wetlands; movements of migratory species; plans and ordinances protecting biological resources; habitat conservation plans; and effects to populations of non-special status species and potential ecosystem changes. The Proposed Project/Proposed Action, Alternative 1 and 2 would have significant and unavoidable adverse impacts under CEQA in 16 counties if the mountain lion is listed under the California Endangered Species Act (see Section 4.2.2.3.1) for the threshold related to special status species under CEQA. There are seven mitigation measure that are described in Section 4.2.2.3.2. Other biological resources thresholds of significance would have no impact to less than significant impacts with mitigation (see Section 4.2.2.3.2) under CEQA and no impact to not significant impacts under NEPA as these measures are already incorporated into WS-California's WDM.

Tribal Cultural Resources

The EIR/EIS identifies the following tribal cultural resources that could be affected by the Proposed Project/Proposed Action and Alternatives: sites, features, places, cultural landscapes, sacred places, or objects that have cultural value to a Native American tribe. Based on the nature of the Proposed Project/Proposed Action and the proposed mitigation measures (see Section 4.2.3.4.2), the Proposed Project/Proposed Action and Alternatives 1-4 would have no impact or less than significant impacts with mitigation under CEQA and not significant impacts under NEPA to tribal cultural resources. Alternative 5 would also have less than significant impacts under CEQA and not significant impacts under NEPA. No mitigation measures were identified for Alternative 5.

Hazardous Materials

The EIR/EIS identifies the following methods and activities that are part of the existing WDM that include the use of hazardous materials or other potential hazards: pesticides, animal drugs, explosives, airports, and emergency response. This section also discusses risk assessments developed in support of WDM activities, WDM activities at contaminated sites, and the use of these materials around schools and sensitive receptors. There is one mitigation measure that is described in Section 4.2.4.4.2. Based on the nature of the Proposed Project/Proposed Action and the proposed mitigation measure (see Section 4.2.4.4.2), the Proposed Project/Proposed Action and Alternatives 1-5 would have no impact or less than significant impacts with mitigation under CEQA and not significant impacts under NEPA as these measures are already incorporated into WS-California's WDM.

Human and Companion Pet Health and Safety

There are no thresholds of significance for this topic in the CEQA Appendix G, therefore the impacts were analyzed under NEPA. The EIR/EIS identifies the use of various capture devices such as cage traps, snares, and foothold traps in the Proposed Project/Action. These devices could potentially harm humans and capture non-target species if used improperly. However, WS-California, the CDFA, and county wildlife specialists would use these devices in compliance with applicable laws and regulations to minimize risks. They would only provide operational assistance upon request and would use capture devices approved by the land or resource manager/owner. When placing capture devices on public lands, bilingual warning signs would be placed near trap sets to alert the public to potential hazards. On private lands, wildlife specialists would make reasonable efforts to obtain approval from adjacent landowners when setting capture devices under fence lines to avoid capturing domestic animals. The Proposed Project/Proposed Action, Alternatives 1-3 and 5 would have not significant impacts under NEPA. The Alternative 4 analysis is provided for informational purposes as financial reimbursement is not available to WS-California.

Noise

The EIR/EIS identifies the following noise methods that could cause impacts during WDM: indirect methods (electronic distress sounds, propane exploders, pyrotechnics, and chemical repellents), direct methods (trapping, rocket nets/cannon nets, aerial shooting, and ground-based shooting), vibration potential, and airport noise exposure in the Proposed Project/Proposed Action. The Proposed Project/Proposed Action would have less than significant impacts with mitigation under CEQA and not significant impacts under NEPA for indirect methods, direct methods, vibration potential, and airport noise exposure. There are 16 mitigation measures that are described in Section 4.2.6.4.4. Alternatives 1-3 would have less than significant impacts with mitigation for indirect and direct methods and less than significant impacts for vibration potential under CEQA and not significant impacts under NEPA. Alternative 4 would have less than significant impacts for indirect and direct methods, vibration potential, and no impacts for airport noise under CEQA. The Alternative 4 analysis is provided for informational purposes as financial reimbursement is not

available to WS-California. Alternative 5 would have less than significant impacts for indirect and indirect methods, vibration potential, and airport noise under CEQA and not significant impacts under NEPA.

Public Services

The EIR/EIS identifies the following public services that could be affected by the Proposed Project/Proposed Action: fire protection, police protection, schools, parks, and other public facilities. The Proposed Project/Proposed Action would have beneficial impacts on public services thresholds of significance due to reduced demand on emergency service providers to respond to calls for human and companion animal health and safety responses. Alternatives 1-5 would have no impact or less than significant impacts under CEQA and no impact or not significant impacts under NEPA to public services thresholds of significance.