

Co-Chairs Dembrow and Pham and Committee Members:

I am a co-founder of and advisor to the Benton County Agriculture and Wildlife Protection Program ([AWPP](#)). This county program provides grant funds to farmers for the purchase of wildlife deterrents such as livestock guardian animals, electrified fencing, scare devices, and protective housing. I am writing in support of cuts in the Governor's Recommended Budget to "predator control" funding for the Department of Fish and Wildlife.

I watched the recording of the March 21 SB 5509 Informational Hearing and I am concerned that there may be a misunderstanding among ODFW staff that Wildlife Services field operations staff (trappers) routinely "do" non-lethal predator control.

My conversations with AWPP grant recipients, other farmers throughout the state, and a review of over 15 years of USDA Wildlife Services activity reports for Benton County obtained through the U.S. Government Freedom of Information Act (FOIA) reveals that Wildlife Services does not purchase and install any non-lethal wildlife deterrents in Benton County. The wildlife take (kill) summaries show that all "direct control" provided by Wildlife Services in Benton County has involved the use of lethal methods including neck snares, steel-jawed leghold and body-gripping traps, calling-and-shooting, and poisons.

A 2009 Wildlife Services [directive](#) (below) explains that the non-lethal "field activities" of a Wildlife Services trapper are "limited to technical assistance recommendations" and that non-lethal methods are to be "applied by the resource owner" (i.e. the farmer).

In other words, Wildlife Services does a lot of "talking" about non-lethal deterrents but does not actually "do" proactive non-lethal livestock protection in Benton County.

Respectfully,

Randy Comeleo  
Co-Founder and Program Advisor  
Benton County Agriculture and Wildlife Protection Program  
<https://www.co.benton.or.us/awpp>

# WS Directive

2.101 07/20/09

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## SELECTING WILDLIFE DAMAGE MANAGEMENT METHODS

### 1. PURPOSE

To provide guidelines used for basic decision-making, selection of management methods and techniques, and program direction.

### 2. REPLACEMENT HIGHLIGHTS

This directive replaces WS Directive 2.101 dated 10/29/03.

### 3. BACKGROUND

Wildlife damage management (WDM) is practiced as a field of specialization within the wildlife management profession. WS personnel may provide services via technical assistance, direct-control assistance, or both. Technical assistance and direct-control assistance encompass the use of nonlethal and lethal management methods. In some situations such as livestock protection, the number of nonlethal methods available to the professional wildlife damage specialist for use in direct-control assistance is currently limited. Most of these nonlethal methods focus on management of the affected resource and not on control of the offending animal. In these instances, WS involvement in using nonlethal methods may be limited to technical assistance recommendations which are more appropriately applied by the resource owner. These methods may include the use of livestock guarding animals, the electronic guard or other noise making device, predator-proof fencing, fladry, shed lambing, herding, and night penning. In other situations such as the protection of aquaculture, seed crops, and airport safety, control methods may include bird dispersal techniques and repellents, cattail management for blackbird control, or grass management at airports. To continue providing Federal leadership in managing problems caused by wildlife, WS supports and promotes scientific research to develop and improve WDM methods and to provide science-based information for WDM.

WS activities are developed, conducted, and/or supervised by professionals who are knowledgeable in the biological, ecological, economic, and social principles that govern wildlife management decisions. Periodic field inspections, program audits, report monitoring, and customer feedback help to ensure program compliance with applicable laws, regulations, and policies.

#### 4. POLICY

When responding to requests for assistance, WS may provide technical assistance, direct control assistance, and/or research assistance. Technical and direct control assistance, as defined below, may involve the use of either lethal or nonlethal methods, or a combination of the two. Preference is given to nonlethal methods when practical and effective.

a. Technical Assistance. Technical assistance is defined as advice, recommendations, information, equipment, literature, instructions, and materials provided to others for use in managing wildlife damage problems and understanding wildlife damage management principles and techniques.

b. Direct Control Assistance. Direct control assistance is defined as field activities conducted or supervised by WS personnel.

1. Direct control assistance may be implemented when it has been determined that a problem cannot reasonably be resolved by technical assistance or that the professional skills of WS employees are required for effective problem resolution. Direct control assistance is often initiated when the wildlife damage involves several ownerships, sensitive species, application of WS restricted-use pesticides, or complex management problems requiring the direct supervision of a professional wildlife manager or biologist.

2. Direct control operations will be conducted upon request only with the written authorization of the landowner, cooperators, other authorized officials, or in accordance with another appropriate instrument such as a memorandum of understanding.

Wildlife damage management strategies can be either preventive (applied before damage begins) or corrective (applied when damage is in progress). The decision process used to formulate WS program responses to requests for assistance is shown in WS Directive 2.201, WS Decision Model.

#### 5. SELECTION OF MANAGEMENT METHODS

The WS program applies an integrated WDM approach to reduce or prevent wildlife damage. In selecting damage management techniques for specific wildlife damage situations, consideration must be given to the species responsible and the frequency, extent, and magnitude of damage. In addition to damage confirmation and assessment, consideration must be given to the status of target and potential nontarget species, local environmental conditions, relative costs of applying management techniques, environmental impacts, and social and legal concerns. These factors must be evaluated in formulating management strategies and may include the application of one or more techniques.

6. REFERENCE

ADC Final Environmental Impact Statement, Chapter 1.C.2 - Wildlife Damage Management, pp 3-7 (October 1997).

ADC Final Environmental Impact Statement, Appendix J, Methods of Control, pp 1-14 (October 1997).

WS Directive 2.105, The WS Integrated Wildlife Damage Management Program (03/01/04).

WS Directive 2.201, WS Decision Model (07/20/09).

Deputy Administrator, Acting