

STANDARD OPERATING PROCEDURE CAPITAL AND FACILITIES MANAGEMENT SERVICES CALIFORNIA STATE UNIVERSITY, BAKERSFIELD

TITLE: Rodent Control Standard Operating Procedure
SCOPE: Rodent Control Efforts within the Campus
RESPONSIBILITY: Capital and Facilities Management Services
PURPOSE: To Outline the Proper Procedures for Performing Rodent Control Efforts

I. PURPOSE AND GOAL

Rodent control efforts are necessary within the California State University, Bakersfield (CSUB) campus to ensure the health and safety of faculty, students, employees, vendors, visitors, and the public.

The goal is to ensure there is no unauthorized “take” of species afforded protection pursuant to the federal Endangered Species Act (ESA) or the California ESA. This Standard Operating Procedure (SOP) provides special consideration for the need to avoid “take” of the San Joaquin kit fox (SJKF; *Vulpes macrotis mutica*; Appendix A, *Photos*: Photo 1), and other protected classes of wildlife. The SJKF is listed as endangered pursuant to the federal ESA and listed as threatened pursuant to Section 2081 of the California Fish and Game Code (California ESA). This SOP was developed with consideration to California Department of Fish and Wildlife trapping laws and regulations and California Code of Regulations Section 6695.¹

This SOP describes the target species for rodent control efforts within the CSUB campus, the responsibility for implementing the Rodent Control Program, the regulatory oversight agencies responsible for enforcing prohibition on unauthorized “take” or “harassment” of species afforded protection under the federal and California ESAs, the procedures for CSUB personnel and contractors engaged in the Rodent Control Program, and the chain of required communication in reporting any incident involving SJKF.

The Rodent Control Program is specifically designed to address four target species that represent a risk to people and property with the CSUB Campus:

- 1) California ground squirrels (*Otospermophilus beecheyi*; Appendix A: Photo 2)
- 2) Botta’s pocket gopher (*Thomomys bottae*; Appendix A: Photo 3)
- 3) Striped skunk (*Mephitis mephitis*; Appendix A: Photo 4)
- 4) Opossum (*Didelphis virginiana*; Appendix A: Photo 5)
- 5) Broad-footed mole (*Scapanus latimanus*; Appendix A: Photo 6)

II. RESPONSIBILITY

1. Capital and Facilities Management Services staff follow this Rodent Control SOP.
2. Capital and Facilities Managers ensure implementation of, and conformance with, Rodent Control SOP.
3. University Police Department ensures SJKF observations and incidents are communicated to regulatory partners and Capital and Facilities Management Services.

¹ California Department of Fish and Wildlife. 19 April 2022. Trapping Laws and Regulations. Available at: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=45902>

4. U.S. Fish and Wildlife Services (USFWS) enforces the federal ESA.
5. California Department of Fish and Wildlife (CDFW) enforces the California ESA.

III. PROCEDURES

a. SJKF Awareness Training

All CSUB staff and contractors conducting rodent control activities will annually undergo SJKF Identification and Awareness Training, prior to conducting such activities within the CSUB campus.

Training will be prepared by a Qualified Biologist.² An annual log of employees who have received training will be maintained by CSUB and be available for inspection by the USFWS and CDFW during normal working hours. Each employee who successfully completes the training will be provided with a Training Completion Card to carry when conducting rodent control activities.

b. No rodenticides will be used.

c. Capital and Facilities Management Services will provide all personnel engaged in rodent control activities with the most current available mapping of SJKF dens³ within one week of scheduled work.

d. Trapping will not occur within the following avoidance zones: 100 feet⁴ of potential SJKF dens, within 200 feet of active SJKF dens, or within 500 feet⁵ of active SJKF natal dens.

e. Live Trapping

i. Skunk and Opossum Trapping

- 1) All trapping will be conducted by contracted individuals holding a current CDFW Trapping License, or designated CSUB staff.
- 2) Prior to trapping, the proposed trapping area and the immediately adjacent 50-foot buffer area will be evaluated by the designated CSUB staff to oversee the trapping. The individual will evaluate the area to ensure it is not within the avoidance zones (100 feet from potential SJKF dens, 200 feet from active SJKF dens, 500 feet of active SJKF natal dens), based on the SJKF Den Map provided by Capital and Facilities Management Services. The individual will document their trapping activity on the Rodent Control Checklist (Attachment 1). Should trapping be required to occur within the defined avoidance zones of a known or

² A Qualified Biologist is any person who has completed at least four years of university training in wildlife biology or a related science and/or has demonstrated field experience in the identification and life history of the San Joaquin kit fox (USFWS 2011).

³ SJKF den mapping will be updated as needed, based on information provided to Capital and Facilities Management Services by ESRP, CSUB Departments, and CSUB Environmental Consultant.

⁴ 100 feet was established based on the USFWS 2011 Standardized Recommendations for Protection of the San Joaquin Kit Fox Prior To or During Ground disturbance.

⁵ Although the campus is not covered under the CDFW Metropolitan Bakersfield Urban Development Incidental Take Permit, 500 feet was established based on the mitigation measures stated for San Joaquin kit fox natal dens under the permit.

historic SJKF den, a Qualified Biologist will monitor the den for three (3) nights to ensure the den is vacant and reduce potential for capture.⁶

- 3) The individual assigned to oversee the skunk and opossum trapping shall have a copy of the current SJKF Known Den Map available within walking distance of the work being conducted at all times during the skunk and opossum trapping.
- 4) A Tomahawk Live Trap Model 108 (or similar; Appendix A: Photo 7), will be utilized. The dimensions for each trap will not exceed a maximum of 32"L × 12"H × 10"W. Each trap will have contact information for the individual overseeing the trapping.
- 5) Traps will be baited with dry cat food (or other bait as recommended by the licensed trapper or regulatory partners). Traps will be checked at a minimum of once a day. Should a trap be occupied by a target species, the trap will be switched out and the target species will be removed from the site. Should SJKF be captured, they will immediately be released at the location they were captured. Any contracted trapper or designated CSUB staff conducting trapping must notify the University Police Department immediately of SJKF capture, as stated in Section IV of this procedure. Further, licensed trappers are required to notify the CDFW of the SJKF capture.
- 6) Frequency of the trapping will be as needed to ensure the health and safety of the public and keep day-to-day campus activities unaffected.

ii. California Ground Squirrel Trapping

- 1) Prior to trapping, the proposed trapping area and the immediately adjacent 50-foot buffer area will be evaluated by the designated CSUB staff to oversee the trapping. The individual will evaluate the area to ensure it is not within the avoidance zones (100 feet from potential SJKF dens, 200 feet from active SJKF dens, 500 feet of active SJKF natal dens), based on the SJKF Den Map provided by Capital and Facilities Management Services. The individual will document their trapping activities on the Rodent Control Checklist (Attachment 1). Should trapping be required to occur within the defined avoidance zones of a known or historic den, a Qualified Biologist will monitor the SJKF den for three (3) nights to ensure the den is vacant and reduce potential for capture.⁷
- 2) A Tomahawk Live Trap Model 103 (or similar; Appendix A: Photo 8), will be utilized. The dimensions for each trap will not exceed 18"L × 6"H × 6"W. Each trap will have contact information for the individual overseeing the trapping.
- 3) Traps will be baited with shell peanuts, chicken scratch, or other non-meat-based product. Due to the abundance of California ground squirrels, traps will be checked at a minimum of twice a day.
- 4) Should a trap be occupied by a target species, the trap will be switched out and the target species will be removed from the site. Any non-target

⁶ Trapping requirements within 100 feet of a known or historic den was established based on the USFWS 2011 Standardized Recommendations for Protection of the San Joaquin Kit Fox Prior To or During Ground Disturbance (USFWS 2011).

⁷ Trapping requirements within 100 feet of a known or historic den was established based on the USFWS 2011 Standardized Recommendations for Protection of the San Joaquin Kit Fox Prior To or During Ground Disturbance (USFWS 2011).

species will be released on site. Should SJKF be captured, they will immediately be released at the location they were captured. Any contracted trapper or designated CSUB staff conducting trapping must notify the University Police Department immediately of SJKF capture, as stated in Section IV of this procedure. Further, licensed trappers are required to notify the CDFW of the SJKF capture.

- 5) Frequency of the trapping will be as needed to ensure the health and safety of the public and keep day-to-day campus activities unaffected.

f. Carbon Monoxide Treatment

- i. Prior to treatment with Pressurized Exhaust Rodent Control (PERC) (Appendix A: Photo 9) and/or Gopher X machines, the proposed trapping area and the immediately adjacent 50-foot buffer area will be surveyed by a Qualified Biologist⁸ to ensure it is not within the avoidance zones (100 feet from potential SJKF dens, 200 feet from active SJKF dens, 500 feet of active SJKF natal dens).
- ii. The Qualified Biologist will identify any potential SJKF dens or known dens with lawn flags to include an exclusion zone around the den (if not already marked).
 - 1) Should treatment be required to occur within the defined avoidance zones of a known or historic den, a Qualified Biologist will monitor the den for three (3) nights to ensure the SJKF den is vacant.
 - 2) If no den activity is observed, the Qualified Biologist will excavate the dens with hand tools and then close the dens.
- iii. Treatment will be applied by an individual familiar with working with PERC and/or Gopher X machines. Target species will be limited to California ground squirrels and Botta's pocket gopher. Treatment will only occur in developed areas of the campus (e.g., sports fields, maintained lawns, etc.). All safety precautions listed per PERC/Gopher X machine manufacture will be followed.
 - 1) To ensure human safety, treatment will not occur within 100 feet of occupied buildings.
 - 2) Treatment areas will be limited to areas surveyed by a Qualified Biologist. Should non-target species be observed, the area will not be treated, and Section IV of this procedure must be followed.
 - 3) Each treatment will encompass a 50-foot radius.
 - 4) During treatment, the exhaust gas holes will be delivered into a burrow opening, and the burrow filled in. A smoke dye will be added to confirm treatment is contained to the target area. Should smoke be observed exiting from another burrow that was not included in the surveyed area, treatment to that burrow will cease. Equipment will be used as specified in the equipment manual.
 - 5) A record entry for the treatment area will be documented and retained for a minimum of two (2) years. The record will include date and device used, name of the operator, location where device was used, and length of time the device was operated for at each treatment location.
 - 6) Frequency of PERC treatment will be as needed to ensure the health and safety of the public and keep day-to-day campus activities unaffected.

⁸ A Qualified Biologist is any person who has completed at least four years of university training in wildlife biology or a related science and/or has demonstrated field experience in the identification and life history of the San Joaquin kit fox (USFWS 2011).

IV. CHAIN OF COMMUNICATION

Should SJKF be captured during trapping efforts, the following communication protocol should be implemented.

- I. Release the SJKF immediately.
- II. Notify the University Police Department (661 - 654 - 2111) immediately.
- III. A licensed trapper must notify CDFW as required per the Trapping Permit.
- IV. University Police Department will notify and coordinate with CFMS Senior Director to engage CSUB's Environmental Consultant.
- V. CFMS Senior Director will coordinate documentation of the incident and will file it in the designated BOX folder.

Should SJKF be observed during PERC treatment (carbon monoxide treatment), the following communication protocols should be implemented:

- I. PERC treatment will cease in the area until a Qualified Biologist can conduct an additional assessment to establish how the area is being used by SJKF.
- II. Notify the University Police Department (661 - 654 - 2111) immediately.
- III. University Police Department will notify and coordinate with CFMS' Senior Director to engage CSUB's Environmental Consultant and to ensure notification of regulatory partners.
- IV. CFMS Senior Director will coordinate documentation of the incident and will file it in the designated BOX folder.

REFERENCES

California Department of Fish and Wildlife. 2014. California Endangered Species Act Incidental Take Permit No. 2081-2013-058-04: Metropolitan Bakersfield Urban Development.

California Department of Fish and Wildlife. 19 April 2022. Trapping Laws and Regulations. Available at: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=45902>

U.S. Fish and Wildlife Service. 2011. Standardized Recommendations for Protection of the San Joaquin Kit Fox Prior To or during Ground disturbance.