

County of Los Angeles

February 27, 2026

Dawyn R. Harrison  
County Counsel



Whitney Lyles  
President and Chief Executive Officer  
Catalina Island Conservancy  
P.O. Box 2739  
Avalon, California 90704

Charlton H. Bonham, Director  
California Department of Fish and Wildlife  
P.O. Box 944209  
Sacramento, California 94244

**Re: URGENT OPPOSITION – Resource Management Permit for  
Mule Deer Eradication**

The Office of the County Counsel represents the County of Los Angeles (County) in all legal matters. We are writing to voice our firm opposition to the approved Resource Management Permit (RMP) authorizing the total eradication of mule deer on Santa Catalina Island. We demand an immediate stay of this RMP based on the unnecessarily violent methodology, the disregard for critical wildfire safety, and the questionable judgment exercised by the Catalina Island Conservancy (Conservancy) in its management approach.

First, the proposed methods of utilizing aerial net capture, nocturnal ground shooting with drone support, and hunting dogs over a five-year period are inhumane and deeply distressing. The RMP clearly contemplates humane sterilization as an appropriate mechanism to control the mule deer population. However, it is unconscionable that the Conservancy has relegated non-lethal humane sterilization to a secondary consideration. Sterilization must be elevated to a primary management tool. Furthermore, while these deer were introduced to the island a century ago, they are indigenous to California and deserve a strategy that respects their status as sentient creatures. We strongly urge a pivot toward prioritizing humane sterilization, followed by expanded public hunting permits and physical relocation. Proceeding with a

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five-year mass slaughter without a definitive, peer-reviewed population survey is scientifically reckless and erodes all public trust.

Second, the community is left questioning the Conservancy's fundamental reasoning and judgment. The advocacy for aerial assaults involving high-powered rifles in 2024, coupled with the recent trauma of catastrophic wildfires in our region, calls your organizations' decision making and priorities into question. This singular quest to protect and enhance the island's native endemic island species and their habitat at any cost appears to be a moral failure that ignores the dignity of animals that have been part of the island's heritage for 100 years.

Third, this plan is a direct threat to human life. Los Angeles County Fire Chief Anthony C. Marrone has explicitly warned that the total removal of these grazers will cause an unmanaged surge in "fine fuels," directly increasing the wildfire danger to the City of Avalon and the island's critical infrastructure. By ignoring the County Fire Department's professional assessment, the Conservancy and California Department of Fish and Wildlife (CDFW) are prioritizing plant life over the safety of human residents. The current plan lacks community consensus and sacrifices public safety for a narrow ecological vision. The RMP's method of mule deer population control must begin with the capture, humane sterilization, and release of the mule deer as the primary methodology of accomplishing the RMP's goals. Should the Conservancy insist on proceeding with its ill-conceived plan for mule deer removal, we formally request that CDFW review the methodology and a revised plan that incorporates sterilization and fire-risk mitigation as core components.

Thank you for your anticipated cooperation with our request. Nothing herein shall serve as a waiver of any of the County's rights and remedies, each of which is expressly reserved.

Very truly yours,

DAWYN R. HARRISON  
County Counsel

By  for  
RORY LOALLEN  
Senior Deputy County Counsel  
Property Division

RA:av



# COUNTY OF LOS ANGELES FIRE DEPARTMENT



ANTHONY C. MARRONE  
FIRE CHIEF  
FORESTER & FIRE WARDEN

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January 7, 2026

TO: THE HONORABLE JANICE HAHN  
SUPERVISOR, FOURTH DISTRICT

FROM: ANTHONY C. MARRONE, FIRE CHIEF 

### MULE DEER MANAGEMENT ON CATALINA ISLAND

This memorandum outlines the key facts, operational considerations, and recommended course of action regarding mule deer management on Catalina Island, with a focus on ecosystem impacts, wildfire behavior, and fuels management.

#### Background

Mule deer are a non-native species on Catalina Island. Scientific research indicates that mule deer browsing can influence vegetation dynamics, particularly following disturbance events such as wildfire. Fire return intervals of less than seven years significantly increase the likelihood of vegetation type conversion from chaparral to grassland.

The most recent large wildfire on the island was the Island Fire in 2007. While grass fuels are considered more receptive to ignition and rapid spread, they generate a significantly lower Energy Release Component (ERC) than chaparral fuels and are generally more manageable during suppression operations.

#### Ecological Considerations

Catalina Island supports a unique ecosystem with native and endemic plant and animal species. In the island's natural condition, the island fox serves as the apex predator, preying on smaller native mammals. Removal of mule deer would reduce invasive plant seed dispersal and allow vegetation communities to trend toward native conditions. If mule deer are removed, the introduced bison would remain the only non-native large herbivore on the island.

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WHITTIER

However, mule deer browsing also impacts native vegetation. Highly palatable native species are preferentially consumed, potentially inhibiting regeneration and facilitating the spread of invasive plants. Without population control, deer numbers may increase, exacerbating vegetation type conversion following disturbance events.

### **Fire and Fuels Management Considerations**

From a wildfire risk perspective, complete removal of mule deer presents operational concerns. In the absence of herbivory, chaparral fuel loads would increase, resulting in higher tons per acre and elevated ERC values. Fuel age classes exceeding 25 years are extremely difficult to manage during wildfire incidents and significantly increase suppression complexity.

Increased fuel loading would elevate wildfire risk to developed areas, particularly in Avalon and other locations where heavy fuels are present within 200 feet of structures. Conversely, maintaining a reduced mule deer population can provide a measurable reduction in understory vegetation and seedling establishment, moderating fuel continuity and, under certain conditions, improving firefighting effectiveness depending on weather, fuels, and topography.

### **Conclusion**

Both ecological integrity and wildfire risk must be considered in mule deer management decisions. An actively managed population provides the most balanced approach, limiting long-term vegetation type conversion while helping moderate fuel loading in proximity to communities.

If mule deer are fully removed, additional long-term costs would be incurred to implement and maintain a comprehensive fuels management program, particularly adjacent to developed areas. Active population management represents a lower-cost alternative with measurable fire risk reduction benefits.

### **Recommendations**

Based on these considerations, it is recommended that land managers determine an appropriate ecological balance through an actively managed mule deer population. Population regulation should focus on minimizing type conversion and long-term habitat

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change, with particular emphasis on removing female does as the most effective population management strategy. If a decision is made to remove all mule deer from the island, a comprehensive fuels management program should be implemented, especially in areas adjacent to development and human occupancy.

If you have any questions, please contact me at (323) 881-6180.

ACM:es

c: Kyla Coates  
Chloe Cheney-Rice