

CALIFORNIA CATTLEMEN'S ASSOCIATION

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April 12, 2018

Pete Figura and Kent Laudon
California Department of Fish and Wildlife
601 Locust Street
Redding, CA 96001

Gentlemen,

I am writing to express my deep concern, shared by ranchers throughout northern California, that the California Department of Fish and Wildlife has inadequately communicated with ranchers about wolves in the north state. While these concerns have lingered since OR-7 made its initial forays into the state, they are more pressing given recent developments, with the Lassen Pack perpetrating its second confirmed livestock depredation and with ranchers in the Scott Valley being blindsided by OR-44's appearance in trail camera photos.

I have two primary concerns regarding the Department's communication with ranchers: (1) the failure of the Department to meaningfully alert ranchers regarding the presence of dispersing or otherwise wide-ranging wolves, and (2) the failure of the Department to properly communicate its depredation investigation protocols to ranchers.

THE DEPARTMENT INSUFFICIENTLY ALERTS RANCHERS TO THE THREAT OF NEARBY WOLVES

Many ranchers in the Scott Valley were surprised last week when OR-44 appeared in trail camera images. OR-44 is a radio-collared wolf, and as such his whereabouts were well-known to the Department via information-sharing with the Oregon Department of Fish and Wildlife. In fact, according to the "Currently Known Wolves" page on the Department's gray wolf web page (not updated until April 5), OR-44 has been in California with the Department's knowledge since March 13. OR-44's whereabouts were apparently well-known to wolf advocates as well. It appears the only stakeholders unaware of OR-44's location were ranchers who may have unwittingly placed their livestock in harm's way.

I first became aware of OR-44's presence in California on April 3 after an evening lecture coincidentally focused on differing perspectives regarding gray wolves in California. After the lecture, one of my students approached me with an image of a wolf taken by a trail camera in Scott Valley early that morning. I had no knowledge of wolf activity in that area and was taken by surprise when one of my invited speakers, a wolf advocate, said "that must be OR-44 if it's around Etna."

That wolf advocates are aware of the presence of wolves while ranchers remain in the dark is extremely troubling, to say the least.

While ranchers are frustrated by the lack of wolf management conducted by the Department, we appreciate that your efforts are constrained by gray wolves' status as an endangered species

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under both the state and federal Endangered Species Acts. That said, no provision of law precludes the Department from meaningfully communicating with stakeholders, and ranchers have been repeatedly frustrated by the Department's inability or unwillingness to be transparent regarding potential threats of wolf/livestock conflicts.

I understand that the Department has concerns about disclosing specific location data for wolves (though I believe the premise for that concern—a fear that ranchers will harm or kill wolves—is unfounded). That said, **the Department must provide producers some meaningful notice that wolves are in the general area** so that ranchers can better protect their livestock *and* wolves.

Prior to capturing an image of OR-44 on a trail camera, many ranchers in the Scott Valley were unaware that there was a wolf in the area. The ranchers that captured the image reported that they had recently turned freshly-branded and castrated cattle into the field where the trail camera was located, so it was likely that the smell of blood lingered in the air and it is possible that there were other wolf-attractants present. The producer stated that he would not have placed cattle in that field had he known of wolf presence. Without the knowledge that wolves are nearby, ranchers have little impetus to alter their routine ranch practices; however, if ranchers are on notice that wolves may be nearby, they can take necessary precautions to prevent wolf/livestock conflicts.

Notice need not be in the form of pin-point location data. However, it is unthinkable that the Department would not alert the California Cattlemen's Association, the Siskiyou County Cattlemen's Association, or select media of OR-44's presence in Siskiyou County generally, or even Scott Valley specifically. Such notice would not be so specific as to imperil the dispersing wolf but would be specific enough to provide area ranchers reasonable notice that they should be vigilant in managing their herds.

In responding to ranchers' frustrations in an April 8 email, Kent noted (by reference to OR-54's travels through northern California in January and February) that dispersing wolves can travel 18 or more miles in a day and that GPS data from radio collars only uploads every three hours, making it impossible to communicate with "everyone [the wolf] passes." If anything, the fact that wolves are so mobile and that GPS collar data is uploaded so infrequently demonstrates a need for *broader* dissemination of wolf location data, as there is a much wider geographic area at risk of wolf/livestock conflict. In the instance of a dispersing wolf, the Department's practice of notifying nearby ranchers—which may be appropriate when a pack establishes dens and rendezvous sites—is insufficient. **When a wolf disperses across vast terrain, the Department would be better-served to provide notice to the broader community.**

Indeed, providing notice of wolf presence to ranchers could be key to safeguarding wolves. Coyotes and dogs threaten livestock throughout northern California, and ranchers are within their rights to dispatch these animals when they threaten or attack their livestock. Wolves have been mistaken for coyotes and dogs in the past. Should ranchers have no basis for believing that wolves are in the area, wolves may be at risk as ranchers defend their livestock. However, if ranchers are on notice that an endangered wolf could be nearby, they will undoubtedly be more cautious in protecting their herds.

THE DEPARTMENT LACKS TRANSPARENCY IN CONDUCTING DEPREDAATION INVESTIGATIONS

In my conversations with ranchers throughout Lassen and Plumas counties, a near-universal concern that I have heard is that the bar is too high for the Department to classify a suspected livestock depredation by wolves as “confirmed.” It seems that the more fundamental issue, however, is that the protocols for investigating suspected depredations and the criteria for classifying a suspected depredation are shrouded in mystery.

The California Wolf Conservation Plan does not discuss the factors or criteria that will lead to a suspected depredation by wolves being “confirmed.” And while the “Gray Wolf Depredation Investigations and Concerns” section of the Department’s website provides the results of depredation investigations, nothing on that web page fully describes what an investigation entails or comprehensively details the factors to be considered in classifying a suspected depredation.

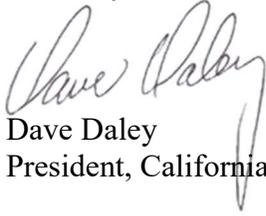
On January 24, you provided me with Wildlife Services Form 200 and the Wildlife Services classifications, which you then said the Department was using in conducting its depredation investigations. **Any documents currently being relied upon in conducting investigations and classifying suspected depredations should be publicly posted to the Department’s website** so that ranchers are on notice regarding the factors that will weigh in favor of confirmation. Moreover, **investigation protocols and classification criteria ought to be revised so that they are specific enough to be understood by a broader audience.** For instance, the current Wildlife Services description of a “confirmed” kill states that one factor that could indicate whether wolves are responsible for a kill is the “feeding pattern on the carcass,” but the document does not specify what sort of feeding pattern would be indicative of a wolf kill.

There is a sense in the ranching community that the Department is hesitant to confirm wolf kills; the lack of transparency regarding investigation protocols does not ease these concerns. In the recent confirmed depredation in Indian Valley, ranchers believe that if producers had not heard the calf in distress and seen three wolves “in the act,” there would not have not been enough evidence the next day to confirm the wolf kill. This was a small calf with three wolves. By morning, there could have been other scavengers, other disturbances, and perhaps very little of the calf left to make a determination. The Department should consider clarifying and indicating a willingness to confirm wolf predation. Had that recent depredation been called “probable” rather than “confirmed” by the investigation the next day, it would further undermined trust in the Department.

As with wolf presence, there is a clear benefit to the Department improving transparency and communication regarding investigations: if ranchers are better informed of the evidence the Department will consider in conducting its investigations, they will have a better sense of whether to involve the Department in an investigation and will be more informed of what evidence to preserve in instances when a Department investigation is warranted.

Ranchers appreciate the effort to diminish the concerns about wolves: educational outreach programs have been well attended by the ranching community. But it isn’t enough. If the Department truly desires to see the peaceful coexistence of wolves and livestock in California, it must improve its communication with the state’s ranchers.

Sincerely,

A handwritten signature in cursive script, appearing to read "Dave Daley". The signature is written in black ink and is positioned above the printed name and title.

Dave Daley
President, California Cattlemen's Association

CC: Hon. Doug LaMalfa, Congressman, 1st District of California
Hon. Brian Dahle, Minority Leader, California State Assembly
Charlton Bonham, Director, California Department of Fish and Wildlife
Stafford Lehr, Deputy Director, CDFW Wildlife and Fisheries Division
Wyatt Hanson, President, Lassen County Cattlemen's Association
Rick Roberti, President, Plumas-Sierra Cattlemen's Association
Greg Kuck, President, Siskiyou County Cattlemen's Association