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**Questions regarding the need and impacts of a Section 9 that must be answered:**

- What happens if the department fails to meet their obligations under the SFA mitigation plan?
- What happens when a producer operating in an SFA will not sign a mitigation plan?
- Can a plan be required if the producer has not agreed to it?
- Who is responsible for placing and maintaining enhanced nonlethal methods on public land?
- What are the requirements for how rancher logs for range riding or human presence will be kept and recorded?
- What are enhanced proactive non-lethal deterrents? How do enhanced proactives differ from additional non-lethals?

**Section 9. Special focus areas (SFAs) for recurrent conflict mitigation**

**Definition**

A Special Focus Area (SFA) can be created in all or a portion of a geographic pack area where livestock depredations have occurred in two of the last three years and incremental lethal removal of wolves had been authorized.

**Goal**

The shared goal for implementing a Special Focus Area (SFA) is to minimize livestock depredations in areas that have experienced recurrent and significant ~~or rapidly increasing~~ levels of conflict, and consequently to reduce the need for lethal removal of wolves. Historic depredation events could be used to recognize an SFA.

The Department's decision to establish an SFA is a recognition that repeated livestock loss and wolf removals are likely to cause significant hardship for producers and their animals, as well as their communities, wolf packs, the wolf advocate community, and WDFW staff.

**Creation of an SFA**

The Director may create an SFA when the defined conditions have been met.

**Review Required**

Once an SFA is established, department staff will conduct an assessment of its existing conflict mitigation ~~efforts plan~~ and the decisions staff and other involved parties made within the SFA for the past three years to determine the strengths, weaknesses, effectiveness and timeliness of those decisions. This assessment must include conversations with affected producers, associated landowners, range riders, representative of the county sheriff in SFAs in Ferry and Stevens counties, and land management agencies to further inform the potential causes for the recurrent or increase in livestock depredations in the SFA.

Conclusions from this assessment work will be recorded in a draft summary document that will then be reviewed by non-department wolf management experts. Comments provided by these non-department

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experts must be included in the final summary document. [This assessment document forms the basis for Special Focus Area mitigation plans.](#)

### SFA Conflict Mitigation Plan

Once an SFA is established, department staff, working in coordination with the affected livestock producers [and land managers](#), will develop a SFA conflict mitigation plan focused on adaptive alternatives that seek to reduce or eliminate additional loss of livestock and attempt to break the need for repeated lethal removal of wolves in these areas. In developing the plan, department staff will focus on non-lethal wolf deterrence methods and techniques designed to reduce wolf-livestock interactions. ~~Removal of livestock from an allotment in an SFA is not considered a non-lethal wolf deterrence method.~~

**Commented [PS2]:** We agree with this statement but don't think it needs to be in this section.

Staff must complete these plans, working with affected livestock producers, prior to beginning of the next grazing season. Changes can be made to the plan, including requiring additional types of non-lethal deterrents, during the grazing season only with the agreement of the affected producers and the department.

These plans may include descriptions for the use of:

- Methods that are currently known to have the highest potential for being effective and easily can be adapted through the grazing season as more is understood about effectiveness.
- Additional non-lethal deterrents and the underlying reasoning for why this new approach will provide additional benefit.
- Enhanced proactive non-lethal deterrents, if they are available, what those deterrents are, how they will be used and the underlying reason for why this new approach will provide additional benefit.

These plans must include a commitment by the department:

- To [make attempts to](#) place collars on at least two wolves on each pack that are known to be depredating on livestock in the SFA. At least one of these collars must be set to upload data every four to six hours and download every 24 hours.
- To provide collar data information every [six hours](#) to DCP-L users and to state and self-funded range riders when it is available in that frequency, and to [county sheriff's department](#) for use by their staff to inform producers of potential problem areas and depredation sites.
- And other entities to deploy nonlethal deterrents at least two weeks prior to livestock turnout with the assistance of livestock producers after turnout.

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**Commented [PS3]:** I understand the intent behind this language. However, even with the best of efforts, it can be difficult to successfully trap and collar wolves. I am uncomfortable mandating this outcome when circumstances are beyond the Dept's control.

**Commented [PS4]:** Not all collars they have available produce data this often. Are you suggesting that they invest in collars that can download at this rate?

**Commented [PS5]:** Don't they already get data when its available?

### Lethal Removal Decisions in an SFA

If [implementation of SFA mitigation plans](#) ~~these non-lethal deterrents~~ fail to [prevent depredations that reach thresholds established in Section 6](#), ~~mitigate conflict and depredations continue~~, lethal removal may be authorized as [described](#) ~~written~~ in sections 6 and 7 of the protocol.

This section does not alter the guidance for lethal removal provided in Section 6 ~~of the Protocol if at least one producer within the SFA is implementing a Conflict Mitigation Plan.~~

**Commented [PS6]:** Do you guys think we still need this statement given the edits in the paragraph above?

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