

The Oregon Hunters Association Comments:

OHA supports all the comments below made by RMEF pertaining to appropriateness of this proposal's connection to *draft wolf plan* fine-tuning. We do recognize that the efforts put into this proposal are done in the spirit of compromise and consensus. However, this effort has occupied a lot of stakeholder, staff, and facilitator crew time and energy and seem to bring about more complexities, and burdens, than solutions.

In addition, OHA has these (5) specific concerns on this proposal:

- 1) That sportsmen dollars would potentially be diverted to wolf management and away from long established priorities for big game management – which is primarily funded by Oregon's hunters, and has been for a century or more.
- 2) That wolves are given status well above all other wildlife – setting an unrealistic precedent for wildlife managers as we move into a time of a much larger, and state-wide, wolf population. Normalization of management for this species will be critical for acceptance by rural communities who are directly affected by their presence.
- 3) That private landowners and public land permittees are unduly burdened with property protection that impacts their livelihoods. Whether livestock are on private or public land they are still essential for the owner's livelihood. It is also important to note that livestock production is one of the top two industries in our state and that warrants extreme consideration when looking at operational impacts.
- 4) That there has not been discussion as to how many wolves are acceptable in a pre-determined area or zone within our state. If wolves have "special status" this should include a special effort to determine their carrying capacity with all the other economic and aesthetic interests in our state.
- 5) Controlled take will be essential for both supporting #4 (carrying capacity) and normalizing this species prior to the next plan revision. Sportsmen and agricultural producers have been very tolerant of wolf expansion across Oregon. The only way this tolerance will continue is with realistic, and respectful, numbers management of wolves.

Comments from Rocky Mountain Elk Foundation:

The advisory group was created to review and comment on the Draft Wolf Conservation and Management Plan. Let's get back to review of the staffs Draft Plan as written.

This Proposal is not contained in the Draft Plan, and this Proposal should not be considered further at this time because it is too ill defined and is contingent upon legislative actions to change state law and to provide funding. Legislative action is decidedly problematic.

The staff's 13 questions, shown below, must be answered before going forward to be certain that the proposal is a value added and not a detriment to the management of the wolf and all the other species of Oregon wildlife. The sponsors of the proposal and working with staff should provide the answers to the questions. A side by side comparison of the comparable tenants in the current plan, the Draft Plan and the Proposal must be made against a standard set of criteria to assure the Proposal provides superior cost-benefits before going forward.

Further, the Proposal appears to increase administrative complexity, require additional time, effort and expense in terms of staff and the livestock producers, creating additional hoops for both parties to jump through prior to any response to depredation. The proposal blurs the current clear line of responsibility for wolf management by ODFW by proposing the insertion of ODA.

I must point out that the original 2005 Wolf conservation and Management Plan was a compromise between competing interests, and that it has work remarkably well in restoring the wolf to the Oregon landscape. In drafting the original plan, it was by agreement limited in its prescription of requirements.

The forbearance of the livestock producers and the hunter-supported conservation organizations combined with thoughtful and professional Plan implementation by ODFW staff have been and will be key to management success.

The Wolf Plan must provide for ODFW being able to comply with ORS regarding wildlife management policy and response to depredation. The Proposal has issues in these areas that are not addressed. The Proposal should be tabled and considered in a future Wolf Plan revision.