

Public Correspondence

**Public correspondence received
as of August 17, 2010**

MINOGGIE KENNELS**Doug Shade**

RECEIVED

JUL 28 2010

WILDLIFE DIVISION

19322 NW Sauvie Island Rd.
Portland, OR 97231

Phone 503-621-3597

*Public Correspondence
Topic Sauvie Island
WA Mgmt Plan*

July 25, 2010

Attn: The Oregon Department of Fish and Wildlife,

The paper I am looking at reads "What do you think about Wildlife Area Management". It is concerning the new management plan about to be adopted for Sauvie Island Wildlife Area. You want comments, you are about to get them.

First off I want to look at one issue in specific. It is called Strategy 4 and it reads: "As part of the individual dog training permit, develop limitations to the number of dogs (3) allowed per individual permitted trainer, per vehicle, to curtail commercial use of the wildlife area and to reduce conflicts between dog trainers."

As you may have deduced I am one of your so called "commercial" users. I am not sure how someone decided that training dogs on the wildlife area falls under the rule that "No person, commercial vendor or company shall dispense or sell material, goods or items on the area, except by permit." I have a kennel here on Sauvie Island. I pay taxes, I buy hunting and fishing licenses and I buy parking permits to use the Game Management Area. I don't charge people to specifically train their dogs on the Wildlife area, I don't sell any goods, I don't even charge for my advice when I am there. I am using public property purchased with money from taxes on arms and ammunitions of which I am a purchaser of both.

Dog training has been unfairly singled out for years by the wildlife management area. To my knowledge it is the only user group that is required to have a permit to use the S.I.W.M.A. Fisherman, beach goers, bird watchers, bicyclists, hikers, hunters etc. are not required to have a special permit. They are only required to have a parking permit which we also must have and a valid hunting or fishing license which we also must have if we are shooting birds. Why single out one group?

If we are going to call people with more than 3 dogs, or for that matter insert any number you want, commercial users, then let's apply the same rule to some of the other user groups. What about the photographer who takes a picture in the Wildlife area and sells it? What about the guy who rents out his kayaks for users to paddle through the lakes of the Wildlife area? How about the guide who takes people out to bird watch? Shouldn't we lump all of these users plus others I haven't mentioned into "commercial" users? Is this about money? Would the state like to charge people with more than 3 dogs an additional fee so they can have a special permit to use the wildlife area? If it comes to that, if you want me to pay an additional fee to use land that some of my money's helped purchase, that some of my money's are used to maintain the land and pay salaries for than so be it.

The other part of Strategy 4 that needs to be openly addressed is "to reduce conflicts between dog trainers". I do not know what conflicts they are talking about although I can't say they don't exist. If there are problems between trainers or with dog clubs wouldn't it be best to call them in and discuss these issues. Through the years I have tried to make it known to the different game commissioner's that if there is a problem with any of the retriever clubs or with me for that matter, let me know so I can try to find a solution. I have not been told of any problems for the past several years so I may have wrongly assumed there were none.

I looked through the list of some of the former owners were of land that was purchased to create the S.I.W.M.A. Many of these previous owners had the foresight to request that the state allow dog training on the property. Little did they know that eventually that privilege was going to be challenged and ultimately probably taken away. One former owner, Ed Minoggie, started training dogs on this island in the early 50's. He helped form the Oregon Retriever Trial Club, one of the clubs that use the island for their licensed dog events. In no way shape or form would Ed have ever wanted the right to train dogs taken away from anyone, including and specifically his fellow professionals.

I moved to Sauvie Island in 1984. In that time the following has happened on and to the S.I.G.M.A. First, there were road closures. Reason being was that geese wouldn't feed close to any roads. Of course, geese traditionally did not use the west side where many of these road closures took place. Because of these closures we lost countless acres of grounds and waters to

train on. Fishermen were also impacted causing them to hike great distances to get to traditional fishing grounds that held water in the late summer. Next, parking areas were created to help lump everyone together rather than letting all users spread out and more easily access grounds or waters they were seeking. This was followed by 2 large chunks of area being set aside for a nesting study. These areas were never put back in to the general use area and I have never heard of any results of any studies that were made. The next closure that affected all user groups was a postponement of the opening of the S.I.W.M.A. each spring by 2 months originally and now up to 3 months has been established. The original reason was to minimize the impact on nesting bald eagles. These bald eagles didn't seem to be impacted by the slew of fisherman looking for the elusive spring Chinook in the Multnomah Channel along the banks of which they nested but apparently they were impacted by dog training and bird watching and fisherman inside the confines of the area. Lastly, way too many acres have been lost by all user groups due to the stranglehold that mainly blackberries, but also tansy and thistle have put on the S.I.W.M.A.

For several years, I personally along with several dog clubs have tried to work with the Game Commission to start spraying and removing the large tracts of blackberries that were taking over the S.I.W.M.A. At one point in time I was told that they had applied for a grant for pasture management and that the money would be used to spray the berries and tansy that had become so bad on the east side. When I asked about it again the following spring I was told they did not spray and had used the money somewhere else. The dog clubs have been volunteering manpower, money, spray and whatever else it takes to help out for the past 3 years. Several clubs have increased entry fees or have worked at making money in other ways so they would have the funds available when the time came to need them. Last year a small tract was sprayed by the dog clubs. This year we were told that our help or money was not needed at this time.

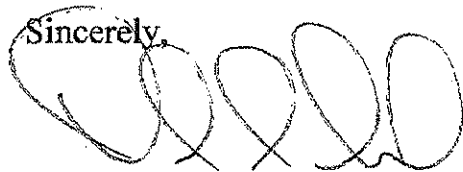
Spraying berries isn't the only positive that the dog clubs have tried to bring to the island. Several years ago the Oregon Retriever Trial Club offered to gravel a section of the east side dirt road. The dog clubs would obviously benefit in wet weather by being able to still get over the dike. What was missed was that all users would benefit because the road would be open to everyone who wanted to use it.

The clubs have also introduced countless number of kids to the wildlife area and what it has to offer. Many of these kids had never set foot on Sauvie Island nor did they have any idea what a well trained dog could do until they came out to help one of the many dog clubs that use the S.I.W.M.A.

You want me to tell you what I think about the S.I.W.M.A. If you want to come and throw out your garbage or leave your bait containers and drink containers when you fish it's the perfect place. Same goes for beach users, don't worry about packing out your garbage, they have people to come in and pick up after you. If you are looking for a good place to break in to vehicles while the occupants are nude sunbathing on the beach this is also the place you want to be. If you are looking for a place to traffic drugs come to Sauvie Island. If you just want to train your dogs, pack out your own trash and that of others you come across, don't come to Sauvie Island because you are not going to be welcome for long.

I don't know how many dogs I have trained in my 26 years. I do know many of them are hunted both on the public lands here on the island but also at several of the private duck clubs. When I hear stories about how great the dogs have done, the cripples they have found or the ducks the dogs have recovered that the owners would have never found I feel I have done my part to contribute to the "Conservation" movement by my dog training. Maybe the Game Commission should survey the hunters and ask them how they feel about limiting "commercial" users from the S.I.W.M.A.

Sincerely,

A handwritten signature in black ink, appearing to read 'Doug Shade', written in a cursive style.

Doug Shade
Owner/Minoggie Kennels

From: Libby Wentz [mailto:libbypw@hotmail.com]
Sent: Wednesday, July 28, 2010 10:37 AM
To: odfw.commission@state.or.us
Subject: SIWA Management Plan

07/28/10

Dear Commissioners,

Thank you for your time spent listening to my concerns regarding beagles and coonhounds and the Sauvie Island Wildlife Area Management Plan at your June 3rd meeting. I appreciate that rabbit hunting in the North Unit has been included, and hope provisions for running coonhounds will be included in the final draft.

I am aware of the importance of duck hunting and preserving their habitat in SIWA. It will not be difficult to incorporate coonhound activities in areas not used by waterfowl hunters and at times when they will not be hunting.

If waterfowl season is mid-October through the latter part of January, coonhounds could run September 1 until waterfowl season opens, and then again after it closes until March 15. There would be no conflict with night hounds running in the North Area where beagles are allowed either. The area beyond the cattle guard at the end of Rentenaar Rd. is perfect for running hounds also.

Incompatibility with parking permit's hours has been used as a reason night use is out of the question. The parking permit hours were picked because those were the hours already being used by state parks. There was no thought to the impact it would have on coonhunters that had been using the North Unit without incidents. It was oversight which affected a group that historically does not actually do anything when rules and laws are made against them. The present manager of SIWA was not around when parking permits were introduced and is creating a revised history and set of reasons against correction simply to ensure his agenda and promise that coonhounds will never run on SIWA is fulfilled.

The parking permit dilemma can easily be remedied by allowing houndsmen to buy night use parking permits, at a cost and in addition to the regular parking permit. Any concerns about confusion between lawful night use permit holders and poachers (which I maintain is a hypothetical problem on SIWA) would be allayed by not allowing guns at night. The coon population does not seem large enough to support harvesting the animals, anyway.

Finally, in addition to helping to preserve a dwindling American sport, allowing houndsmen to run coonhounds at night would benefit SIWA by making it less desirable to less desirable people: those who illegally 'mud' off road in the dark of night, those who use drugs out there, and those who vandalize the area.

Please do not approve the 2010 Sauvie Island Wildlife Area Management Plan if provisions for coonhound hunters to use the area at night are not included.

Sincerely,

Libby Wentz
545 Collins Crest
Gladstone, OR 97027
503-722-1558

From: Tim & Karen Rieman [mailto:tkrieman@gmail.com]
Sent: Wednesday, July 07, 2010 12:12 PM
To: odfw.comments@state.or.us
Subject: Wildlife management plan, dog training

To whom it may concern,

I am writing in regards to the proposed plan for dog training in the Sauvie Island Wildlife Units. I do not understand the reasoning behind limiting training privileges to people with three dogs and under. I am an amateur trainer with three Labrador retrievers that I train and run in hunt tests. I have many friends that are both amateur and professional dog trainers that I train with who have anywhere from 1 to 14 dogs.

This land is state land that we all pay taxes to support not to mention the money we pay for parking permits, hunting licenses and the money our retriever clubs donate to the wildlife management area for weed spraying and upkeep. To take the right to use this land from people who are professional trainers or people with more than three dogs is just plain wrong.

These people are doing conservation a great service by training dogs to retrieve down game so it doesn't go to waste. I hunt on both the east and west side units and have witnessed people hunting without dogs, they lose birds on a regular basis. The right to train dogs on state managed lands should be encouraged not restricted.

The argument that there are conflicts between trainers is nonsense. I have trained dogs on the west side unit for 15 years and have never witnessed any friction between people about room for training. If one group is set up in an area, the later one coming in just goes farther down the road to a different area.

I also question the logic about not being able to train on the east side management units. The fisherman have free rain on this area, and year in and year out leave garbage and trash all over the place. I have never met a person training dogs that haven't taken out what they brought in including spent shell hulls from shotguns.

What if a professional trainer is benefiting from the use of this land? He pays taxes, is it really hurting anything. Don't we have enough government regulations and fees.

In a worst case scenario wouldn't it make more sense to charge for a permit than to eliminate it completely. I hope this doesn't go through, it would be a travesty.

Sincerely,
Tim Rieman

WHAT DO YOU THINK ABOUT WILDLIFE AREA MANAGEMENT?



The Oregon Department of Fish and Wildlife is seeking your comments regarding management of the Sauvie Island Wildlife Area. You can add your comments to the record by completing this form and turning it in tonight, faxing it to ODFW at 503-947-6009, or by sending an e-mail to ODFW.comments@state.or.us. All comments will be kept on file at ODFW headquarters in Salem.

This draft is a thoughtful improvement to the first draft. Consideration to the wildlife viewing public is evident in the indication that opportunities for viewing will be increased with an uplocation of scheduled days and a hint of expanded area.

One disappointment is the specifically noted closure dates of Oct. 1st - May 1st or May 15th will not accommodate better access. Hopefully there will be some room for flexibility on this issue regarding certain areas like Oak Island that are so clearly loved by the non-hunting public and hopefully the warrenton rock trail will remain open to the public as well.

Barbara Scot
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I have participated in field events for dogs for more than a decade. I train my own dogs.

HOWEVER, I DO TRAIN WITH A NUMBER OF PROFESSIONAL DOG TRAINERS ON OCCASION, INCLUDING USING SIWA. THERE ARE NUMEROUS OTHER INDIVIDUALS WHO ALSO "DAY TRAIN" WITH A PRO TO INCREASE OWN ABILITIES AS HANDLERS. RESTRICT^{ING} PROFESSIONAL ACCESS TO SIWA ENDS UP RESTRICTING ALL OF US.

GIVEN THE LIMITED AMOUNT^{OF LAND} OF FISH & WILDLIFE ALLOWS FOR DOG TRAINING IN THE NORTHERN HALF OF OREGON - INCLUDING EAST OF THE CASCADES IT IS HARD NOT TO SEE THE PROPOSED CHANGES AS PART OF AN EFFORT TO STIFLE THE SPORT.

THEREFORE, I WRITE IN OPPOSITION TO THE PROPOSED CHANGE IN THE OAR LIMITING "COMMERCIAL DOG TRAINING" ON THE SIWA.

HANK WERNER
17168 SW PACIFIC HWY F262
TIGARD, OR 97224

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RE: OBJECTIVE 3.2

RE: "To virtual this activity, the department is considering limiting the number of dogs to three per individual permitted teacher, per vehicle.

This statement limits professional training which has gone on in the area for over 50 years.

I object to it for the following: (I am not a pro)

1. Dogs (most) trained by pros are best prepared to retrieve downed birds
(Consistent with DFW laws)

2. I have never been impacted by pros despite training every week for over 10 years

3. I see no need to change something that has happened (with good results) for many

years
4. Other licensed guides use the area & dog training pros would be unfairly impacted.

PHIL SPERR

17500 NW LUCY REEDER RA.

PORTLAND, OR 97231

beanflip@gol.com

971-404-9513



July 19, 2010

Mr. Mark Nebeker
Sauvie Island Wildlife Area
18330 NW Sauvie Island Rd
Portland, OR 97231-1312

Dear Mr. Nebeker,

Thank you for providing Portland Audubon with the opportunity to review the revised draft of the Sauvie Island Management Plan. We would note some specific areas of significant improvement over prior drafts. However many of the deficiencies identified in our previous comments (10-30-2009) remain unresolved. We are submitting both a redlined version of the current draft management plan as well as our prior comments (below) with bolded sections highlighted in yellow identifying the degree to which we feel issues have been addressed. We would request the opportunity to meet with you to discuss our remaining concerns.

Background

The Sauvie Island Wildlife Area is of critical importance to Portland Audubon's 11,000 members in the Portland Metropolitan Region. Portland Audubon has a longstanding relationship with the Sauvie Island Wildlife Area. In 2003 the Wildlife Area was designated as one of 103 internationally recognized Important Bird Areas (IBAs) in Oregon. Important Bird Areas are sites that have been identified as being of critical importance for avian breeding, wintering and migratory needs. Portland Audubon manages the IBA program in Oregon.

We view our collaborations with the Sauvie Island Wildlife Area as an important and productive part of our program and are eager to find new opportunities to work with ODFW to protect and restore the wildlife area and to utilize the wildlife area in an ecologically responsible manner to increase public enjoyment, understanding and stewardship of the important natural resource values that are found on the island.

Our current activities on the Sauvie Island include:

1. Leading dozens of natural history trips and class to the island each year;
2. Partnering with ODFW, Metro and HawkWatch International to present Raptor Road Trip each February, an event which draws between 400-800 people to the island to learn about its wintering raptor populations;

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3. Public releases of rehabilitated birds of prey, events which have drawn as many as 800 people;
4. Wildlife research including point counts at Oak Island (in support of ODFW plans to restore habitat) and at Wapato Wetlands and raptor surveys;
5. Restoration Projects including helping support shorebird habitat restoration at Racetrack Lake and Coon Point and a kestrel nest box installation and monitoring program;
6. Rehabilitation of wildlife including using the refuge for flight training and hacking of injured and orphaned native birds.

We appreciate the opportunity to comment on the draft management plan. We strongly support the ecosystem-based management philosophy on which the new plan is based and are pleased to see that the Oregon Conservation Strategy (OCS) is explicitly referenced as a guiding document. We fully endorse the plans stated prioritization that public uses must be compatible with the protection, enhancement and management of wetland and upland habitats to benefit fish and wildlife species and all of our ensuing comments should be read in that light. However, there are several places that we believe the document could be improved.:

Specific Comments on the June 2010 SI Management Plan with Updates:

1. **Public Process:** We were originally informed that ODFW would develop a public stakeholder group to help develop the Management Plan. We were quite surprised when the plan rolled out in draft form without such a process having been initiated. Our understanding is that ODFW was concerned about a repeat of the acrimony associated with development of management plans in the past. We believe that this concern would have been best addressed through professional facilitation of the plan development process rather than forgoing the stakeholder process altogether. We believe that the Management Plan would have benefited from the type of dialogue that is generated in a stakeholder process, but which does not typically occur in the three minute sound bites presented at public hearings. We also believe that a stakeholder process would have allowed ODFW the opportunity to solicit outside input and expertise in areas of particular interest or deficiency. Finally we believe that a stakeholder process not only helps to build ODFW's relationship with the community but also helps build relationships between diverse stakeholders. The decision to abandon the stakeholder process was in our opinion ill advised and inappropriate for a public agency.

Update: The public process remains challenging. To the best we can tell, Audubon only received notification and a copy of the revised plan when we requested it from ODFW and after it had already had a first hearing by the ODFW Commission. We

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would have expected ODFW to actively reach out to Audubon when the revised draft became available. We regret if notification was missed on our end.

2. **Public Access for birders and other wildlife watchers:** It is absolutely critical that ODFW reach out to non-traditional constituencies and provide more equitable access to the island for the birding and wildlife watching communities. In the past, Audubon has been a strong and vocal supporter of ODFW management decisions that have reduced access to benefit natural resource protection and restoration efforts. We continue to support prioritization of these objectives even where access is reduced. However, where opportunities do remain, ODFW needs to do a better job of considering the birding and wildlife watching communities. The Draft Plan as written is insufficient to rectify this existing deficiency.
 - a. The document in several places refers to "hunting, fishing and other wildlife oriented recreational and educational opportunities" (see pages 3 and 38). This type of language perpetuates the perception that birding and wildlife watching are relegated to secondary considerations. It is important that ODFW identify these activities by name: We would recommend "Hunting, fishing, birding, wildlife watching and environmental education opportunities."
 - b. The plan should describe specific strategies for increasing opportunities for birders and wildlife watchers including increased winter opportunities. Strategies could include the following:
 - i. Winter closure days when birders and wildlife watchers will be allowed into restricted areas rather than hunters;
 - ii. Special winter birding permits (fee based) that will allow conditional access to specific restricted areas (could be coupled with provisions to prevent conflicts with hunting activities);
 - iii. Permits to allow groups such as Audubon to lead trips to winter closure areas at specific times;
 - iv. Increased monitoring programs that would allow trained volunteers to enter restricted areas to support research priorities.
 - c. There is an error on page 37. The text describes an average of 8500 hunter visits per year but Table 5 describes 15,000 hunter days.
 - d. Raptor Road Trip, IBA and Working Group as well as formal field trips offered by Audubon and other organizations should be added to the list of activities on pages 39 and strategies on page 57;
 - e. The educational/ interpretive section on page 40 should provide greater detail regarding existing activities;

UPDATE: The revised plan does a better job of describing existing opportunities for access for birders and wildlife watchers and does acknowledge a need to look for increased opportunities. We are pleased to see a commitment to developing additional viewing facilities; however we would like to see some targets and a greater degree of specificity associated with these strategies. We are disappointed

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that the revised plan fails to address the most important wildlife viewing deficiency which is associated with winter closures----the plan simply states that ODFW will "potentially allow limited access to closed areas (Page 67). We would request a firm commitment to expanding wildlife viewing opportunities in the closure areas along with a list of potential specific strategies for accomplishing this objective as per the list above. In general, the document maintains a "hunting centric" perspective that plagued the prior draft.

3. Management for Canada and Cackling Goose Habitat: We are deeply concerned that the Management Area is being converted into a Canada and Cackling (i.e., ssp. *minima* and *leucopareia*--AOU now considers the Cackling Geese and Canada Geese to be separate species) goose farm. We understand the pressures placed on the Management Area by Native American subsistence rights in Alaska as well as by depredation concerns of local farmers. However, Sauvie Island is critical for a wide variety of species, and biological diversity should not be sacrificed to support a monoculture of Canada geese. It is of great concern to see the amount of land being proposed to address this narrow concern. The overall effectiveness of such a strategy, including the incremental benefits of converting additional areas to goose forage, are poorly described. We question whether this strategy is sustainable given that refuge goose populations have increased from 6,000 in 1947 to more than 100,000 today (with migration peaks at sometimes reaching 300,000) and we are still nearly 70,000 geese below flyway targets. The heavy prioritization placed on managing Canada and Cackling geese is inconsistent the vision articulated in the plan: "...*Sound management measures to support a diverse array of fish, wildlife and plant species.*" We encourage ODFW to do the following:

- a. We strongly question whether management for wintering Canada and Cackling geese should be singled out as one of four primary management foci;
- b. Clearly distinguish in the Management Plan between grasslands that are managed for goose forage and grassland that are managed specifically for other species or for broader ecological biodiversity. On page 20 grasslands/ and pastures should be separated into their own sections;
- c. Continue to work with the farm community to develop hazing strategies and incentives to deal with Canada/Cackling Geese on private lands;
- d. Better evaluate the incremental value of conversion of refuge habitat for goose forage--how effective is this strategy for reducing depredation on private lands;
- e. Work with the Pacific Flyway Council to evaluate whether continued growth of goose populations is sustainable in terms of refuge management objectives in the Willamette Valley and beyond;
- f. Consider reducing the area allowed for hunting and dog training in order to provide reduce disturbance areas for geese, thus reducing the overall land-base necessary to set aside for goose habitat.

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UPDATE: We remain greatly concerned by the degree to which the current draft of the management plan prioritizes geese over other species and the continued failure to look at off-refuge solutions to address goose problems. We do not see that any of the recommendations made above were incorporated into the plan.

4. **Funding:** Audubon strongly supports the development of mechanism that would allow birders and other wildlife watchers to contribute more substantively to support the refuge. We would support both voluntary and mandatory funding mechanisms. At the statewide level we have supported a tax on birdseed to fund the ODFW Wildlife Conservation Strategy. We have also supported establishing and increasing fees for access to ODFW managed wildlife areas for non-consumptive users. We encourage the management area to look for refuge specific strategies to take better advantage of funding opportunities presented by the vast popularity of the refuge with the wildlife watching community. Strategies to consider include:
 - a. Non game stamps;
 - b. Wildlife Watching Access Fees;
 - c. Special Access Birding Permits (for example to access specific areas during winter closures);
 - d. Increasing collaborative grant writing to fund specific wildlife diversity projects;

This topic continues to only receive cursory coverage in the management plan.

5. **More explicit recognition of the importance of nearby habitat areas in protecting the integrity of the Sauvie Island Management Area:** The Sauvie Island Management Area is part of a larger network of remnant natural areas that comprise what is left of the Lower Columbia River Floodplain. In many respects the system is failing, a fact exemplified by the federal listing of salmon and steelhead species and reports detailing dramatic declines in native bird populations. Significant management changes or landscape conversion at proximal natural areas has direct implications for the integrity of the Sauvie Island Management Area. For example potential loss of hundreds of acres of habitat at West Hayden Island to marine industrial development or increased public access at Government Island facilitated by expansion of public docking facilities could drive Canada Goose populations westward to Sauvie Island exacerbating an already difficult situation. It could also increase the importance of prioritizing certain species such as Streaked Horned Lark and western painted turtles as local alternatives for migratory stopover habitat, foraging and breeding are reduced. We recommend that the management plan devote a section to more fully describing the system of natural areas in which the Sauvie Island Management Area is embedded and strategies for developing a more holistic integrated approach to managing this system.

This topic has not been addressed in the revised management plan.

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6. **Intertwine Alliance:** In 2007, Portland Audubon, Trust for Public Land, Urban Greenspaces Institute and Metro began work on a new alliance devoted to building "The world's best system of parks, trails and natural areas." The geographic focus of the Alliance is the Portland-Vancouver Metropolitan Region with a specific priority placed on ensuring that the efforts of the Alliance directly complement and connect to biodiversity and active transportation (bike and pedestrian) efforts on the greater landscape. A second focus of the alliance is increasing funding to fund the parks, trails and natural areas system with notable success already occurring with passage of the 2006 Greenspace Bond Measure (\$237.4 million) and the 2008 THPRD Bond Measure (\$100 million). Too often Sauvie Island is viewed as outside and separate from the urban ecosystem when in fact Sauvie Island is directly impacted by natural resource decisions made by proximal jurisdictions and serves as a primary destination of choice for urban residents. We encourage the Sauvie Island Management Area to become actively involved in the Intertwine Alliance as a vehicle for integrating the objectives of the management area into funding, biodiversity, recreational and environmental education strategies at the regional level.

UPDATE: We appreciate ODFW's increased participation in the Intertwine effort.

7. **Species specific prioritization and strategies:** The plan should more clearly describe how it will help meet the objectives of the Oregon Conservation Strategy. This should include detailed descriptions of how the habitat objectives in the plan will benefit specific species of conservation concern and how these management strategies will contribute to overall regional objectives.
- a. 50 acres of native grasslands and 193 acres of oak woodlands and oak savannah is woefully insufficient given that more than 2,100 acres of habitat will be managed for Canada and Cackling Geese. The disparities are overwhelming and completely contrary to the Plan's stated objective of managing for diverse populations of native fish and wildlife.
 - i. We would in particular like to see conversion of some existing goose pasture to serve as habitat for grassland species including Western Meadowlark, Streaked Horned Lark, Savannah Sparrow and Short-eared Owl.
 - b. The plan notes that over 274 avian species (including 70 breeders), 37 mammals and 13 herps are found on the refuge. The plan should clearly delineate which non-game species are priorities, how the plan will benefit these species and how this will contribute to regional objectives. For species of conservation concern that are not assisted by the plan, there should be a clear explanation of why these species are not being targeted.
 - c. The Plan should include a shorebird strategy to ensure that existing and historic shorebird habitats are maintained and restored. Loss of shorebird habitat and viewing opportunities is a major concern for Audubon. The information provided on page 42 (consideration of shorebird habitat in yearly

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work plans) is a start in the right direction, but it does not go far enough--there should be a specific list of priority sites that will be managed for shorebirds.

- d. The Plan fails to state any management objectives for the shoreline beach habitat found on the island. The plan seems to simply accept that the beach will serve as habitat for nudists and other recreational users. The Plan should incorporate specific management objectives for wildlife that utilize beach habitats including shorebirds and gulls.
- e. The Biological Resources Section of the Plan fails to consider passerines, gulls, herons, egrets, grebes or raptors. These omissions should be corrected.
- f. The monitoring section describes existing monitoring program. It should also include a prioritized list of new monitoring programs that should be initiated on the refuge (should resources become available) to track specific species of conservation concern.
- g. The plan fails to mention invertebrate species such as butterflies, moths, dragonflies, mussels etc. These should be considered.

UPDATE: The plan provides a greater level of specificity and detail regarding its connection to the OCS. However targets for oak habitat and grassland habitats have not changed and remain insufficient. Also the revised plan fails to see clear targets for shorebird habitat. Finally the plan again fails to address invertebrate species.

8. Other Issues:

- a. Page 39: The Plan should describe in greater detail what steps will be allowed to control for West Nile Virus. As written the plan suggests that ODFW is deferring to vector control agencies. We recommend that ODFW take a more active role in this process given the implications for native wildlife populations. **This issue was not addressed.**
- b. Strategy 1 on page 59 ("manage public use compatible with the biological needs...") is actually an objective. The Plan should provide specific strategies as to how this will be accomplished. **This issue was addressed.**

Thank you for your consideration of our comments. Please feel free to contact me if you need any further clarification or information. We look forward to continuing to work with the Management Area in the future.

Sincerely,



Bob Sallinger
Conservation Director
Audubon Society of Portland

Audubon Society of Portland
5151 NW Cornell Road
Portland, OR 97210
(503) 292-6855
www.audubonportland.org

Heather Thomas

From: Mark Nebeker
Sent: Monday, August 02, 2010 4:43 PM
To: Heather Thomas
Subject: FW: Wildlife management plan, dog training

Heather,

Not sure if you have this one or not

Thanks,

Mark

From: Brandon Reishus
Sent: Friday, July 16, 2010 1:09 PM
To: Mark Nebeker; Nancy Breuner
Cc: David Budeau; Bradley Bales
Subject: FW: Wildlife management plan, dog training

This needed to go to you 2

Brandon S. Reishus
Assistant Game Bird Biologist
Oregon Dept. of Fish and Wildlife
3406 Cherry Ave NE
Salem, OR 97303
Office (503) 947-6324
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From: ODFW Comments
Sent: Friday, July 16, 2010 12:46 PM
To: Brandon Reishus; Bradley Bales; David Budeau
Cc: Michelle Tate
Subject: FW: Wildlife management plan, dog training

From: Tim & Karen Rieman [mailto:tkrieman@gmail.com]
Sent: Wednesday, July 07, 2010 12:12 PM
To: odfw.comments@state.or.us
Subject: Wildlife management plan, dog training

To whom it may concern,

I am writing in regards to the proposed plan for dog training in the Sauvie Island Wildlife Units. I do not understand the reasoning behind limiting training privileges to people with three dogs and under. I am an amateur trainer with three Labrador retrievers that I train and run in hunt tests. I have many friends that are both amateur and professional dog trainers that I train with who have anywhere from 1 to 14 dogs.

8/2/2010

This land is state land that we all pay taxes to support not to mention the money we pay for parking permits, hunting licenses and the money our retriever clubs donate to the wildlife management area for weed spraying and upkeep. To take the right to use this land from people who are professional trainers or people with more than three dogs is just plain wrong.

These people are doing conservation a great service by training dogs to retrieve down game so it doesn't go to waste. I hunt on both the east and west side units and have witnessed people hunting without dogs, they lose birds on a regular basis. The right to train dogs on state managed lands should be encouraged not restricted.

The argument that there are conflicts between trainers is nonsense. I have trained dogs on the west side unit for 15 years and have never witnessed any friction between people about room for training. If one group is set up in an area, the later one coming in just goes farther down the road to a different area.

I also question the logic about not being able to train on the east side management units. The fishermen have free rain on this area, and year in and year out leave garbage and trash all over the place. I have never met a person training dogs that haven't taken out what they brought in including spent shell hulls from shotguns.

What if a professional trainer is benefiting from the use of this land? He pays taxes, is it really hurting anything. Don't we have enough government regulations and fees.

In a worst case scenario wouldn't it make more sense to charge for a permit than to eliminate it completely. I hope this doesn't go through, it would be a travesty.

Sincerely,

Tim Rieman