

WITNESS REGISTRATION

Oregon Fish and Wildlife Commission

Thursday, September 2, 2010 - Washington County Fair Complex

EXHIBIT H

PUBLIC HEARING ON: EXHIBIT H: Sauvie Island Wildlife Area Management Plan

NAME (Please Print)	MAILING ADDRESS (Please Print)	AFFILIATION (Please Print)	TELEPHONE (Please Print)
John Poer	21800 NE Abernathy Rd	Oregon Retriever Club JACOLT, WA 98675	360-686-3868
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Lynnie Duke	10375 NW 195th Ave	NWPPA,	503-789-2464
Kerry Porter	5510 SW Dover Loop, Portland OR 97225	Oregon Baiting Club.	(503) 947-0494
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NAME (Please Print)	MAILING ADDRESS (Please Print)	AFFILIATION (Please Print)	TELEPHONE (Please Print)
Jane Hartline	14745 NW Gillihan Rd	West Multnomah Conservation Dist.	503-621-3357
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Exhibit H. Sauvie Island Wildlife
Area Plan

Sept. 2, 2010

To: The ODF&W Commissioners
From: John Poer 21800 NE Abernathy Road, Yacolt WA, 98675 360-686-3868
Subject: Submittal for September 2, 2010 Game Commission Meeting on Sauvie Island
Wildlife Area Plan
September 1, 2010

Commissioners and ODF&W personnel who have worked on this plan I would like to make a few points, concerning history of the dog training and dog trial groups that have used this area since its inception.

- According to the January 25, 1950 minutes of the Oregon Retriever Trial Club, it had received permission to hold its first trial on what is now ODF&W's Sauvie Island Wildlife Area. The minutes state: The secretary reported that we had received permission from the Oregon State Game Commission to use the Oregon State Public Shooting Ground Reserve on Sauvie Island for trial purposes. We had been advised that Mr. Young, who is actively in charge of the reserve would attend the trial with one or more men and assist us in every way possible. The secretary was directed to handle the necessary correspondence to make these things a matter of written record.
- The reason the Oregon State Game Commission was so willing to have its manager and his assistants help at our trial was the need for increased use of the area to justify Pitman-Robinson funds. Since then we have held about 150 licensed and many more picnic trials on the West and East Side areas. We have been responsible for thousands of dogs who have been used to save downed birds in both water fowl and upland bird hunting. (Currently many of the Field Trial and Hunt Test Labradors and Golden Retrievers are being used to sniff out bombs in Afghanistan and Iraq). They are required to be able to do intermediate field trial work
- With this history of cooperation and working together our community was informed that there would be no changes in dog training and trials in the new plan. Without any input we were to find that not only were changes made but they would make it nearly impossible to hold trials on the areas.
- On page 7, last paragraph, of the Final Draft of the Plan, dated August 13, 2010, under Background, it states: On occasion public interests create tension with each other or the wildlife area's habitat management objectives. For example, creating new parking areas to handle ever increasing numbers of beach visitors would eliminate wildlife habitat. Another example raised by divergent user groups involves the protection of ground nesting birds in parts of SIWA where dog training and organized dog trials are permitted. (Our valuable resource, the hunting and retrieving dog, is lumped in with parking lots on the nude beaches). There is a concern that these activities may be negatively affecting ground nesting birds due to disturbance associated with allowing dogs access to areas where these nests may be present. The challenge for SIWA staff is to attempt to manage both numbers of visitors and potential controversy between user groups. In my forty years of running trials on the East or West Side I can never remember a bird watcher objecting to a trial. We have had many stop and watch. Without exception I can not remember one who was unfriendly or critical. They expect to see hunting related activities on the water fowl management areas.
- Who are these unidentified divergent users groups? After 60 years of trials and training, buying hunting and fishing licenses, shot guns and shells which contribute to the coffers of the SIWA. We are being dismissed because

- unnamed divergent groups without any proof want to restrict our area and let all other groups use it , during the restricted time.
- I was selected by ODF&W to represent the dog training, Hunt Test and Field trial community on a group that held between 15 and 20 meetings to put together the 1993 SIWA, Coordinated Resource Management Plan. The divergent groups that fought to restrict many different uses of the area at that time were the National Wildlife Federation, the Audobon Society and the Sauvie Island Conservancy. Those opposed to their radical ideas, were the Oregon Duck Hunters Association, the cattle grazers, many of the farmers on the island, the duck hunting clubs, the dog clubs, and the trap shooters. I would guess the same groups would line up again and thrash out another plan that included dog training and dog trials. Unfortunately we were not asked to be involved in the process. We were just told what divergent groups and Staff had decided.
 - The 1993 SIWA CRMP clearly delineates areas that we can use. This plan leaves it completely open to restrict us without our input .
 - The 1993 plan under administrative rule 635-08-146 (1), states:”and manage the land for the purpose of providing: wildlife management, wildlife oriented recreation and public hunting areas”. Because of dog training and trials inclusion in the plan it is very clear that they are considered wildlife oriented activities.
 - According to the Staff Summary Attachment 3, “Using the 1993 plan as a foundation, department staff developed a draft management plan for the Sauvie Island Wildlife Area which was presented to the Commission in June 2009”. It is hard to believe the 1993 plan criteria was used when dog training and trials were such an integral part of that plan.

We ask you not to restrict the already shrunken area that we are allowed to use. Hunting dogs are one of your greatest assets nor the professional trainers who use them. I am attaching a copy of a July 18, 2010 Oregonian article that tells of The Transport Security Administration requesting \$71 million from congress to set up 275 new explosive detection teams in airports. The article states thousands of lives have already been saved. Yes they are dogs and primarily hunting dogs. Also the Military is now buying trained field trial and hunt test Golden Retrievers and Labradors for Afghanistan and Iraq to detect bombs. They are required to do above basic Field Trial and Hunt test work and have saved many lives.

Thank you for your time and consideration.

Reference: ODFW Commission Meeting, Sept 2, 2010, Sauvie Island Wildlife Management Plan

Summary of commits from David Elias at the public forum at the above subject meeting

- My comments have to do with the permitting and limitation of number of dogs per person for training on the Sauvie Island Wildlife Area. While this requirement has been removed from the plan presented at this meeting it is clear from the Department Response that the state is planning to develop a state wide plan that could impact dog training.
- It is important to not forget the critical role that trained hunting dogs play in Upland Game and Wildlife hunting. They are a hunter's most important conservation tool for retrieving shot game. They are a crucial resource for meeting the state hunting rules to make every effort to retrieve all shot game.
- Hunting Dogs require a significant amount of training time and grounds to train on to make them competent and effect retrievers. Not all hunters have the ability or time to train hunting dogs. Professional dog trainers provide the knowledge and skills to develop an effective hunting dog. Any survey will show that a large percentage of hunting dogs are trained by professional trainers.
- Any impacts to dog training, trainers, and training grounds will have a direct and negative impact to the dogs used by hunters. The states restrictions on dog training would be an irresponsible action to all bird hunters in this state.

Exhibit H - Sauvie Island
Sept. 2, 2010

Comments from Phil Sperr

Director Oregon Hunting Retriever Club

Sauvie Island Resident

Dear Commissioners,

My wife & I have been retriever trainers on Sauvie Island for almost twenty years and I have hunted ducks on the Island for that same period.

During that time I have brushed blinds for at least four years, repaired them for three years, my wife and I built seven or eight one year and I personally built the two handicapped blinds used on the Island.

Little did I know two years ago that when I asked Mark Nebeker for "better water" to train with in mid-summer on the West Side and his answer was "Don't ask for more-you might get less", he was already planning to eliminate retriever training. We never heard the "true plan" until August 10 when fifty retriever trainers met with him and his staff and boss. This was after the August 6 deadline for comments to "the plan".

You should understand that my wife and I as well as all of our Island training user friends are upset over the lack of input and timing of this "plan".

I also totally agree with the truthfulness and accuracy of Leslie Like's comments and suggested alternatives.

In view of this I implore you to delay approval of this plan until the promised retriever trainer user input has been incorporated into it.

Exhibit A - Sanvie Island
Sept. 2, 2010

Hi, my name is Bryan Hogan and in addition to the four bird dog clubs I'm a member of, I'm the President of the NWPDA and a director of the NWFTC. Many of us are here today as a result of the issues chronicled in Bill Monroe's August 15th column. In case any of you missed it I have a copy of it here for you!

I started using the SIWA shortly after I got my first hunting dog. It was actually on one of those trips 6 years ago that I found the Island property I still live on. The few 100's of acres out of the 11,000+ in the SIWA we are allowed to use are a great resource for those of us in the surrounding communities. For those of us with the passion to train our own hunting dogs or without the ability to use professional trainers this is an irreplaceable resource. The funds that paid for SIWA were actually for purposes specifically like this!

When many of us attended the 2009 public meetings for the proposed SIWA management plan Mr. Nebeker specifically told us that there would be no changes in the SIWA Dog Training Rules. Obviously this was not true or we would not be here today. That coupled with the misstatements of fact and erroneous data in Mr. Nebeker's plan, rightly or wrongly give the impression of trying to slip a biased position into the new plan without any chance for public input. Personally I'm inclined to believe it was for the former reason;

- A) On four separate occasions I've asked for a copy of the 1993 Dog Training Rules and to date I've never received them.
- B) Mr. Nebeker has submitted this plan to you today with many rule changes for dog training. We were told at our August meeting that the ODFW could unilaterally make these changes at any time via "Administrative Rules." It also came up that if the Statewide Rules are adopted in December the same is also true. (We'll be back in December with our comments on those!)
- C) Over the last 2 years Mr. Nebeker's office has attempted to do 2 Ad Hoc studies on ground nesting birds. Neither of these were publicized or brought up until he was directly questioned in August. Both studies failed because they flooded. An interesting sidebar is that when he was asked if there was any outside funding connected with these studies he admitted it was available but they had not "applied for it at this time." Additionally the OCS only recommends "minimizing disturbance during breeding season at known nesting areas." Mr. Nebeker stated

that there are no known nesting areas for the 4 species in the SIWA.
The OCS has a July 15 end date even if there were sites. Mr. Nebeker's
plan excludes us until August 1, why the discrepancy?

As a group, in the 21 days Mr. Nebeker has allowed us to prepare, we have
some specific language we are hoping to have considered in this new
Management Plan. Although you should have already received them we are
passing out copies today too.

Thank you for your time and your consideration of our comments.

Bryan Hogan

President, NWPDA

Director, NWFTC

Leslie Like
10375 NW 195th Ave
Hillsboro, Oregon 97124-8108
leslielike@yahoo.com

Good afternoon Ladies and Gentlemen:

Thank you for the opportunity to address you on the Sauvie Island Management Plan. My name is Leslie Like. I'm the Secretary of the Willamette Weimaraner Club and Secretary for the Northwest Pointing Dog Association. I reside in rural Washington County just 20 minutes from Sauvie Island and have worked in the Columbia, Multnomah, Washington County areas adjacent to Sauvie Island selling Real Estate for the past 30 years.

I grew up in a duck hunting family and spent many nights as a 9 year old in a sleeping bag in line with my father to get a choice unit for hunting. At 83, my Dad is still an avid duck hunter and user of the wildlife area. **I have been a part of the Sauvie Island Wildlife Area experience for more than 50 years.**

I did not think that I would mention that I had previously been a City Councilor with the City of Beaverton and that I sat on the City Planning Commission but I think that it is important that you know that I have a some experience dealing with long term plans, involvement with public input, public hearings and working with a professional Staff.

In my opinion our community of hunters and dog trainers has been treated very badly by ODF&W Staff. Others have mentioned the difficulties and hurdles we have encountered, the complete lack of communication and last minute notifications.

What is truly alarming is the near obliteration of dog training in one fell swoop, all proposed by ODF&W with no input from our community.

I hand delivered a set of amendments on Monday to ODF&W in Salem and hopefully Rep Witts office was successful in sending the same to you last night or this morning. Our community would like to have these amendments adopted into the Plan. I have copies here with me if they did not reach you successfully.

The ODF&W staff has indicated that anything not in the Plan will be changed at their discretion by administrative rule thereby eliminating any public input. This is of huge concern to our community as we are clearly a target for elimination.

Dog owners that train their dogs for hunting and retrieval of downed game, use the Westside Area for individual daily training and a maximum 25 days of events related to training. The Staff at ODF& W proposed eliminating most of our 50 years of traditional use of this area. Last month with a surprise announcement Staff cited nameless and undiscoverable studies related to our impact on the Western end of the Wildlife area to justify our removal. We ask that the areas that we use for training and the dates we use them remain the same as they have been for decades. We have been

excellent stewards of the land we use and we have minimal impact. Staff has provided no information that demonstrates anything differently

We would like to propose the following amendments to the SIWA Plan that I have provided and then work hand in hand with Mr Nebeker in detailing the addendum which governs the details of the dog training Plan.

Thank you for your consideration.

Leslie Like

Proposed Revisions to the Final Draft SIWA Management Plan
Dated September 2010

August 29, 2010

Comments from Leslie Like:
Secretary Northwest Pointing Dog Association
Secretary Willamette Weimaraner Club

Dear Commissioners,

June 30, 2009 a group of hunters and dog trainers representing several breeds and clubs attended the very first meeting at the Sauvie Island School to learn about the proposed changes to the PLAN and give input. Mark Nebeker told the assembled group that there would be no changes to the **Dog Training Rules** and they **were not open for discussion**. We went away disappointed but expecting things to stay exactly the same with regard to dog training.

July 26th, 2010, 13 months later Mark Nebeker e-mailed 12 people and told them there would be a restriction and eliminate dog training and events on the grounds we had been using for over 50 years.

August 11th, 2010 he agreed to meet with us as a group and go over the proposed changes he had been working on for months. Almost 50 people showed up and stood in the parking lot of the SIWA parking area until dark (See attachment A) voicing their distress over the offensive and underhanded way he attempted to move us from our traditional grounds to a 200 yard wide strip along a busy road and amongst fishermen and picnickers.

As hunters and dog trainers we are THE PEOPLE that provided funding for the formation of SIWA. We have been a hand in hand working group with the staff and SIWA from 1943 until this event. What happened? Why are we being treated like this?

Now a look at the PLAN shows that the staff has axed dog trainers, the historical users, founders and funders of the SIWA almost completely and replaced us with other users. Not only that, they did it in a sneaky and underhanded way.

Ron Anglin indicated that he would request an extension to the hearing on the 1993 PLAN so that we could have more than 21 days to properly prepare but **we were refused**. The letter sent by Mr Nebeker dated August 12th (attachment B) says there will be no changes to dog training areas or locations, **yet here is the PLAN with 25 alterations or notes on dog training.**

Having only 21 days to prepare a response to the expansion of a 30 page 1993 Plan to one that is over 100 pages is a burden that is extremely difficult. A quick read of the PLAN shows that Mr Nebeker has reduced the tradition of Dog Training on the Island to a nuisance and elevated 1000's of other users to those that will be "accommodated".

The following are changes to the Final Draft SIWA Management Plan we would like to have implemented. Documentation and rationale is brief due to the pressure of the deadlines imposed by Staff.

1.

Revise Primary Management Foci, page #4 to the following ... Providing recreation and stewardship opportunities for hunters, dog trainers, anglers, wildlife viewers and other wildlife-oriented recreational users.

Leaving dog training out of the list of users of the Island is the opening to delete our 50 year tradition of training and elevates other late coming users to a more important status above us.

2.

Revise Page 5 #4 to the following... Providing recreation and stewardship opportunities for hunters, dog trainers, wildlife viewers and other wildlife-oriented recreational users.

Same as #1, above

3.

Revise Page 7 3rd paragraph to the following.....**DELETE Another example raised by divergent groups involves the protection of ground nesting birds in parts of SIWA where dog training and organized dog trials are permitted. There is a concern that these activities may be negatively affecting ground nesting birds due to disturbance associated with allowing dogs access to areas where these nests may be present.**

This entire sentence is fictionalized. While others user groups may wish to have the traditional user groups (hunters and dog trainers) of the grounds banned or excluded so they may use them for themselves there is NO information to support the above sentence whatsoever.

4.

Revise Page 11 Objective 2.4 **Delete with emphasis on ground nesting songbirds**

The staff is ignoring OCS in emphasizing 4 songbirds which do not traditionally nest on Sauvie Island and are not indicated by OCS to be protected there.

5.

Revise Page 12 Goal 3.... Public hunting is one of the primary reasons for the purchase and creation of SIWA and waterfowl hunting and dog training will remain a high priority public use on SIWA.s

Dog training and trap shooting are integral parts of hunting. Conservation of game is of primary concern and that cannot be accomplished without a plan for the appropriate training of hunting dogs.

6.

Page 12 Objective 3.2 ... Delete in its entirety and replace with: Provide 15,000 user days for individual dog training and dog field trials annually. This provides a reasonable increase over the staffs' estimate of current users.

7.

Page 12 Objective 3.2 ... Delete Compatible with Objective 3.1 and habitat management objectives.

Deleting this portion makes dog training equitable with hunting, trapping and angling in Objective 3.1 and removes the temptation for Staff to use administrative rules to attempt to outright ban dog training as they attempted in July 2010.

8.

Page 23 2nd Paragraph, 3rd sentence.... Delete ...nesting habitat for songbirds

The pasture/grassland is managed for wintering geese. The grazing practicing currently in use and the annual flooding render the grounds minimally useful for ground nesting songbirds.

9.

Page 29 first paragraph.... Revise to place a limit on the numbers that are allowed to attend any single event on SIWA.

10.

Page 40-41 Add.... Language to direct Staff at SIWA to use volunteers at their disposal for removing non-native or noxious weeds and installing improvements to benefit habitat and structures.

An interesting trend in the PLAN is the number of times the ODF&W refers to using volunteers for all kinds of activities yet the Hunting and Dog Training Community seem unable to engage them in using us as volunteers to remove noxious or non-native species of weeds, culvert repair, road/fence repair or monitoring public use, etc.

11.

Revise Page 43.... 3rd paragraph, last sentence this sentence is inaccurate, add..... For example, off road vehicle use is prohibited on SIWA. Horseback riding is limited to roads open to public vehicle traffic and grounds for permitted Field Events. Bicycles are limited to roads open to public vehicle traffic.

Adding the Field Events makes the information accurate.

12.

Revise Page 44 Graph... Dog Training and Field Trials Westside 1,000
Dog Training and Field Trials Eastside 9,000
Trap Shooting500

This graph is not an accurate depiction of use as is it wholly a guestimate per Staff. A more accurate picture of use would reflect the separate use of dog field trials on the Eastside and the Westside. The grounds impacted are subject to different concerns over habitat. Trap Shooting is highly exaggerated. The reason for our concern over any exaggeration by Staff is the distortion of the very small footprint we leave on the grounds and habitat.

13.

Revise Page 45, 6th paragraph, last sentence Delete ... The department is presently working on a Statewide dog training plan which, when approved, will be incorporated into wildlife area operations.

These plans are as yet unknown and may not be compatible with SIWA.

14.

Revise Page 46. 2nd sentence..... SIWA is experiencing this rising interest and the department is exploring ways to increase both opportunities and facilities to accommodate these users.

While there is no objection from our community to enhancing the birding experience on SIWA, the sheer numbers the Staff proposes accommodating raises concerns over pushing other users and the Wildlife to breaking points. We hope the Commission will consider this when accepting a PLAN that adds 1000's of daily users to an already pressured resource which was purchased, maintained and enhanced for Hunters and Waterfowl.

15.

Revise Page 57 Goal 2, 1st paragraph, last sentence..... **Deleteand managing to benefit grassland nesting birds in spring and summer.**

The OCS does not recognize Sauvie Island as a primary nesting site for grassland species

16.

Revise Page 58 Strategy 5 **Control invasive plant species on approximately 200 acres annually.**

Our community finds this number to be woefully inadequate. Improving habitat is one of the main focuses of this PLAN yet only a tiny number of acres are targeted. Staff should revise this to a meaningful number which will benefit the wildlife.

17.

Page 65..... Revise Objective 3.2 Rationale: Delete Provided the activities are compatible with State regulations **and wildlife area objectives.**

While Staff acknowledges in the very first sentence that we have been an established use since 1947 they are now inserting clauses in every single objective, goal and strategy to enable them to eliminate or restrict dog training. The PLAN is relentless in this goal. We were told at the August meeting that there would be NO changes made to the Dog Training Rules but the PLAN is replete with limitations, exclusive, clauses and language to give Staff complete control over eliminating Dog Training.

18.

Page 65 Revise Objective 3.2 Rationale:.... **Delete ...The department also recognizes that dog training/trials during the period of April through July may impact ground nesting birds. As part of the implementation of the OCS, the Department will be managing these pastures/grasslands, compatible with other management objectives and uses.**

This is not compatible with the representations mad by ODF&W Staff at our meeting in August. See response above.

19.

Page 62 Strategy 2..... **Agree....funding and interested partners become available.**

While we have been unable to engage Staff in working with us on improvements we hope the addition of this language will be an encouragement.

20. Page 62 Objectives 3.1.. Add... Provide approximately 170,000 hunting, dog training, trapping and angling use days annually.

Retain dog training as an established use.

21.

Page 63 2nd sentence Add The department intends to manage SIWA habitats and programs to accommodate current levels of hunting, dog training, angling and trapping (170,000use days annually)

Retain dog training as an established use. Since 1947.

22.

Strategy 12 Add.... Develop rebuild and continue relationships with hunting constituent's groups/organizations to assist with wildlife area management annually.

Staff is guilty of locking user groups out of any meaningful discussion and operating in the dark to the detriment of the user groups.

23.

Page 65 Delete..... Approximately 1,252 acres (which includes open water) located in the Westside Units is available for individual dog training. Field trials can occur on either the Westside or Eastside Units, and the department has provided approximately 1,466 acres total for this use.

Commissioners please note! Staff uses additional language to restrict dog training. None of these acres are identified. Currently dog training is allowed on the Westside and this is how it should remain. Staffs' proposal to crowd all users into a tiny slice of land along a busy road with fisherman and picnickers on land that is flooded and unusable during a large part of the season is the secret plan that Mark Nebeker devised and proposed in secret. We vigorously object to this change. This is the encroachment that would virtually eliminate all dog training. Acreage can and should remain as it has been since 1947.

24.

Page 65 Strategy 1 Delete.... Continue the individual dog training and field trial annual permit process *and adjust timing and location as conditions warrant (i.e. high water or administrative action).*

Commissioners please note! This is the open door that Staff has left for themselves to eliminate dog training. There are NO OTHER activities or user groups on the SIWA that are subject to these strategies/rules. Only dog training! This is the secret plan that was proposed by Nebeker that surprised our community and had 50 people at a meeting 21 days ago to object. Ron Anglin sent a letter to all of the users saying this would not happen yet here it is in the PLAN. Please see the attached letter from Ron Anglin. The letter gave a false sense of security to our community believing that the promise of no changes to the dog training rules was real.

25.

Page *71 3rd paragraph Commissioners please note! An additional source of funding for SIWA habitat related projects and equipment comes from the state GAME BIRD STAMP revenues.*

The dog training community wrote and introduced the Upland Bird Stamp Bill to the State legislature. In 2009, 72,098 stamps were sold at \$8.50 each totaling \$612,833.00 for the ODFW. Since its introduction in 1990, the sale of this stamp has generated in excess of 10 million dollars.

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August 29, 2010

Oregon Department of Fish and Wildlife Commission

Good afternoon Commissioners:

I want to thank you for allowing me to come before you with comments regarding the proposed Sauvie Island Wildlife Area Management Plan. My name is Larry Porter and I'm Vice President Field Activities and Board Member of the Oregon Brittany Club, with over 60 members throughout our great State. I am here on their behalf. My family and I have lived in Portland for over 30 years and I am an avid upland game bird hunter, together with my three sons and grandsons. I have been an active volunteer for ODFW at Sauvie Island, organizing noxious weed spraying with other members of the hunting dog community, and obtaining approval and helping to install a man-gate at the Westside Unit. I also persuaded my sons, who specialize in creek restoration, to use their brush hog machine to mow noxious weeds at the Westside Unit. Lastly I have volunteered to obtain the permits to replace a culvert at the Blue Slough at the Westside Unit that was placed there some 40 years or so ago by the Oregon Brittany Club and subsequently destroyed by the livestock that are allowed to cross the Slough.

I am here, along with other concerned members of the hunting dog community, to ask for your support in amending the Management Plan to allow us to do the following:

1. Objective 2.4. The Management Plan outlines various methods for ODFW staff to control invasive plants, with marginal success at the Westside Unit. Language needs to be added to the Management plan, pages 40-41, directing ODFW staff to use volunteers at their disposal for removing non-native or noxious weeds, to allow volunteers to utilize the ODFW herbicide spraying license, and further, for installing improvements that will benefit habitat and structures. Regarding weed control ODFW has an herbicide license and has mechanized equipment for spraying, but lacks the personnel and time to effectively spray the non-native or noxious weeds. Without an herbicide license, volunteers cannot use mechanical sprayers and must rely on hand sprayers, which are cumbersome and less effective when compared to machine sprayers. We ask that you allow volunteers to use the ODFW herbicide license, which would result in the ability of volunteers to use their own mechanized equipment. This would dramatically increase the area that would be sprayed on an annual basis and would lead to aggressive control, prevention of establishment and limiting expansion of invasive plant species. Removal of Himalayan blackberries, tansy ragwort, Canadian thistle and

other noxious plants will allow native plant material to return to those areas and increase habitat for native wildlife.

Provide language in the Management Plan to include options for the hunting dog community to assist ODFW, such as payment in kind for more herbicide spraying by ODFW on the grounds used by the hunting dog community. Payment in kind services could include fence repair, repair of roads and removal of downed trees on roads. Alternatively, the hunting dog community could pay for additional spraying and mowing of noxious weeds.

With respect to habitat improvements, include language under Objective 2.4 to expedite the replacement of the culvert at the Blue Slough. After volunteering in November of 2007 to obtain any required permits, I have been met with cancelled meetings and unreturned e-mails and telephone calls from the various regulatory agencies that may be involved in the permitting. Recently, Mr. Nebeker has arranged an on-site meeting with representatives of ODFW and DSL. I am encouraged but remain skeptical about when the permitting process will be completed, so would like some language in the Management Plan to ensure that the culvert replacement happens. Why is this important? The Blue Slough is contaminated by the crushed culvert and the banks continue to be eroded by the livestock. Tidal flow of the Slough is also restricted by remains of the culvert. Replacement of the culvert will once again provide a crossing for the livestock and it will also provide a connection between the east side and the west side of the Slough for use by the hunting dog community. Both sides of the Slough have been used for dog training for decades. Please refer to the attached map and photo. Additionally, if the culvert work meets the scheduling requirements of my sons, they may provide labor and equipment, at no cost to ODFW, to replace the culvert.

2. Lastly, I ask for certainty in the Management Plan to ensure that the hunting dog community will be allowed continuous use of those Wildlife Areas where we have historically trained our dogs. That certainty is provided in the proposed revisions to the Management Plan prepared by Leslie Like.

Thank you for allowing me to testify.

ATTACHMENTS

*Site Plan of the Blue Slough and the culvert at the Westside Unit

*Photo of the collapsed culvert

Live Search Maps

Scappoose, Oregon, United States



WESTSIDE UNIT



Presented by
Mrs. Lynn Calkins

Exhibit A
Sept. 2, 2010

Wilsonville Veterinary Clinic, LLC

9275 Barber St
Wilsonville, Or 97070
503-682-3737

Raymond L. Calkins, DVM
Kristen Hardinge, DVM Jennifer Anderson, DVM Kristin Beckley, DVM

August 26, 2010

Oregon Dept of Fish and Wildlife Commission Members:

My name is Ray Calkins and I have raised, trained and hunted my own German Wirehaired Pointers in Oregon for 34 years. In 1985, Mike Rice and I organized the Upland Bird Dog Association which represented the pointing and flushing breed clubs in Oregon. This group worked with Allen Kelly of the Oregon Wildlife Heritage Foundation and Ken Durbin of ODFW to raise funds for projects to improve the upland bird hunting in Oregon. Our annual Heritage Classic field trial raised over \$25,000 over a twelve year period for habitat restoration, the red leg partridge and Seschwan pheasant projects and a cooperative project with the Nature Conservancy to re-introduce sharptail grouse to Oregon. Our organization wrote and introduced the Upland Bird Stamp Bill to the State legislature. In 2009, 72,098 stamps were sold at \$8.50 each totalling \$612,833.00 for the ODFW. Since it's introduction in 1990, the sale of this stamp has generated in excess of 10 million dollars. I have represented the pointing breeds on previous Sauvie Island planning committees.

Year by year it has become increasingly difficult to train pointing dogs in western Oregon. In 1976, the entire West Side of Sauvie Island was designated for dog training by ODFW. A 4x8 foot sign stood next to Steelman Lake as proof. The sign has been removed, the area reduced to less than 1/4 of that area, fenced and locked and now a permit is required.

The new Sauvie Island Management Plan is an attempt to eliminate dog training and the organized events to evaluate our dog's skills as class bird dogs and hunting companions. There was no input to this plan from the user group!!! I was told in 2003 that I would be included in any discussion involving training regulations by the ODFW.

The present pointing dog training area is a safe place to train. The fencing has insured the safety of dogs being worked and the area is adequate for pointing dogs. The new proposal pushes all dogs (pointing, retrieving and flushing) and their evaluation testing into an area and time frame that is totally inadequate. The risk of human and dog injury from vehicles on the adjacent road is unacceptable.

Trained dogs greatly reduce the loss of downed birds and should be valued by ODFW. But instead of encouraging owners to train their dogs you have chosen to hinder their efforts. Those of us that utilize the island are predominantly hobby trainers and must drive an hour or more to reach the current training area. Most of us have no other options.

At one time we worked hand in hand with ODFW. Your recent change in attitude has turned allies into adversaries. We have no place else to go if this plan is enacted. We are effectively kicked off the island.

Sincerely



Raymond L. Calkins, DVM

September 2, 2010

Re: Comments submitted to the Oregon Fish and Wildlife Commission regarding the Final Draft Sauvie Island Wildlife Area Management Plan, September 2010.

Chair Rae, Members of the Commission:

My name is Mary Hanson. I am a recent retiree from ODFW. I also happen to own two German Wirehaired Pointers and have held dog training permits for Sauvie Island for at least a decade. I participate in field trials and hunt tests held at Sauvie Island as well as other venues in the Pacific Northwest. I also hunt upland birds with my dogs. In fact, the first time I hunted pheasants on the Sauvie Island Wildlife Area (SIWA), I didn't fire a shot, but at the end of the day I had my limit of two pheasant thanks to the efforts of my Wirehair who brought me two crippled birds.

I belong to three pointing dog clubs and am secretary of the Oregon German Wirehaired Pointer Club. My comments are my own, although I support many of the comments from dog owners/trainers you will hear today. I share their concern that the current draft plan could be construed so as to eliminate dog training and dog trials on the management area. This is based on changes to the draft plan and a recent proposal from SIWA staff to limit dog training and dog trials. For example, on page 10 of the June 2009 draft plan Objective 3.2 states, "Maintain the existing level of 300 individual dog training permits and 50 days of permitted field dog trials, annually, and assure that these activities do not conflict with current and future habitat management objectives". In the final draft (page 65) this objective now reads, "Provide opportunities for individual dog training and dog field trials which will not conflict with wildlife habitat management objectives or Objective 3.1". Objectives 3.1 and 3.3 were unchanged from the original draft and both identify numerical targets. What was wrong with the original language for Objective 3.2? In the final draft the numbers are included parenthetically in the rationale that follows Objective 3.2, but the current wording does not inspire much confidence that dog training and dog trials have a place at SIWA. And, the objectives become rule, not the rationale. I would like to see the original language for Objective 3.2 restored in the final plan.

I would also like to address what I see as a serious failure to adequately engage the stakeholders associated with the current planning effort for the

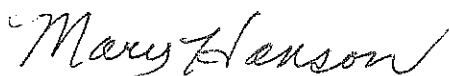
SIWA. During the 1993 planning process a “working group of members of the dog training community and department staff” was used to develop the dog training plans (ODFW 2010, pg. 65). Why wasn’t this process used in the current planning effort? Certainly the Sauvie Island plan would have warranted a working group, given the many and diverse stakeholders.

The use of a working group serves as a forum to identify key issues of contention and to provide an opportunity to have an informed discussion and debate at the beginning of the process. I know of what I speak based on my experience as a basin planner for Fish Division when I was based in southeast Oregon. I coordinated and successfully saw to completion and approval by the Commission two fish management basin plans, the Malheur River Basin Fish Management Plan and the Alvord Basins Fish Management Plan. Both efforts had contentious issues revolving around ESA listed species and, in my opinion both plans were successfully passed into rule with virtually no opposition due in large measure to the participation of stakeholders on the working groups. I feel that much of the resentment and suspicion that many in the dog training community feel at this time with the current process could have been avoided had their input been sought early on. It certainly would have provided an opportunity to inform them of the Oregon Conservation Strategy and how its objectives might influence the final plan.

There is a sentence in the section on Plan Implementation (pp 71 – 72) that says, “The Department will continue to rely on these and other partners in the future to help implement this plan and provide input for future updates”. (Dog Clubs are identified on page 72 in the list of partners.) If the Department truly believes this then I think staff needs to do a better job of public outreach to the user groups.

This concludes my comments and I thank you for the opportunity to present them.

Sincerely,



Mary Hanson
24633 S. Ridge Road
Beavercreek, OR 97004

Revised 2010 Sauvie Island Management Plan

September 2, 2010

Hello my name is Wayne Yamashita. I am the Vice President of the German Shorthaired Pointer Club of Oregon (GSPCO) and my comments are representing the membership.

I would like to thank you for giving me the opportunity to speak with you. I would also like to thank the State of Oregon and the Oregon Department of Fish and Wildlife for allowing me to enjoy the use of the Sauvie Island Wildlife Management Area. For the past 15 years I have had the opportunity to hunt, compete, and train my dogs on Sauvie Island. I have enjoyed being able to take many 8 week old puppies to Sauvie Island and train them into outstanding hunting dogs. I have had success in competitions by training my hunting companions at Sauvie Island. My dogs have attained their American Kennel Club Field Champion, Amateur Field Champion and Master Hunter titles. I share this story with thousands of other hunting dog enthusiasts and many of them have gone on to greater achievements, like winning the National Championship or qualifying at the National Invitational.

Sauvie Island is an incredible natural resource for the State of Oregon and all of the fish and wildlife that call it home are well worth conserving. The GSPCO would like to see all of the key species listed in the Oregon Conservation Strategy (OCS) for Sauvie Island (OCS WV-01) taken care of. The GSPCO would also like to see, as original stakeholder and still a current user of the Sauvie Island Wildlife Management Area some 63 years later, that the hunting dog community be taken care of as well. The hunting dog community has brought millions of dollars to the State of Oregon, volunteered thousands of hours improving the land, and have always takes care of the area that they use, particularly at Sauvie Island. The GSPCO would like to see the use of current areas remain the same in acreage and time of year as it has since the 1993 plan. Because of past lack of notification from ODFW of changes to the Management Plan, recent administrative rules that would have dramatically reduced the area for dog training, and our uncertainty regarding any future administrative rules that would negatively impact our continued use of the dog training areas, the GSPCO, would like to strike the words in section 3.2 "management decision" and be replaced with the wording in Attachment A.

The GSPCO would like to ensure that the hunting dog community be part of planning that secures suitable land that is similar in acreage and time of use that is currently being practiced on the Sauvie Island Wildlife Management Area.

The German Shorthaired Pointer Club of Oregon recommends a delay in the adoption of the Revised 2010 SIWA Management Plan until an amendment or revisions of the dog training rules are applied. We would also like to recommend development of a Statewide Dog Training Review Committee with ODFW to cultivate a better partnership and to ensure better communications in the future. Thank you for your time.

Wayne Yamashita
P.O. Box 772
Washougal, WA 98671
503-705-7217

Attachment A

Objective 3.2 Provide opportunities for individual dog training, dog field trials and hunt tests.

Rationale: Dog training has been an established use since the inception of SIWA in 1947. Two dog training plans (Individual Dog Training Plan and Dog Trial Plan) currently regulate activities on SIWA. As stated in both dog plans, it is the department's policy to permit "field trials and individual dog training on designated units of SIWA provided the activities are compatible with state regulations." Such activities require a department issued permit which stipulates when and where training or trials can occur. The department recognizes that individual dog training and field trials encourage practices and techniques that enhance the tradition and quality of hunting and reduce the incidence of un-retrieved game.

These dog training plans and the current amount of permitted uses were developed during the 1993 SIWA long range management planning process, by a working group of members representing the dog training community and department staff. There have been adjustments to the plans over time and further review will occur. The department intends to maintain the current maximum number of individual dog training permits (300) and number of days of dog field trials (50). Approximately 1,252 acres (which includes open water) located in the Westside Units is available for individual dog training. Field trials can occur on either the Westside or Eastside Units, and the department has provided approximately 1,466 acres in total for this use.

Strategy 1. Continue the individual dog training and field trial annual permit process with no changes to the current plan. Provide information about rules and post signs designating allowed training areas.

Strategy 2. Continue to convene and annual meeting of dog trial sponsors at SIWA to cooperatively schedule dog trial events.

Strategy 3. If there are conflicts with ODFW management decisions and the hunting dog community, all stake holders will decide how the conflict will be managed.

Chris Tewes
DoubleGun Ranch
39275 SE Wildcat Mountain Drive
Eagle Creek, OR 97022

August 24, 2010

Esteemed members of the Oregon Fish and Wildlife Commission, I appreciate the opportunity to come before you today and testify on the status of dog training on the Sauvie Island Wildlife Area, a historical use that goes back decades.

My name is Chris Tewes, and I train pointing breed dogs professionally for hunting, as well as hunt with my own German Shorthaired Pointers and English Pointers. I have 15 years experience with pointing dogs, and for most of those years I have spent a considerable amount of time on Sauvie Island training and running in pointing breed events.

In the latter part of July, 2010, the dog clubs that utilize Sauvie Island for events were informed by Wildlife Area staff that a majority of the area available to us for dog trials and training would henceforth be closed until August 1st, rather than being opened to use on April 15th, as has been the norm. Holders of individual dog training permits were not notified of this change to the SIWA dog training plan, nor were they invited to weigh in on the proposed change beforehand. This change effectively shut the pointing breed clubs and individual pointing breed dog trainers out of the approximately 150 to 175 acres that we use in the Crane Unit for training and events. While 1200 plus acres are set aside on the West Side for such purposes, only this small parcel comes close to suiting the needs of the pointing dog owners, trainers, and event clubs.

The reason cited by Wildlife Area staff for this change was to comply with Objective 2.4 of the Revised Draft of the Sauvie Island Wildlife Area Management Plan that is before you today. Objective 2.4 seeks to bring the SIWA Management Plan into line with the Oregon Conservation Strategy, specifically as it applies to protecting four ground-nesting species of birds during the nesting season – the Oregon vesper sparrow, the Grasshopper sparrow, the Streaked horned lark, and the Western meadowlark. While these species are key species in much of the Willamette Valley, OCS does not list them as such for WV-01, the area in the OCS that includes Sauvie Island.

During a meeting with Mark Nebeker of the Sauvie Island Wildlife Area on August 11th, 2010, Mr. Nebeker did state that, while Wildlife Area staff did know for sure that these species were migrating in and overwintering on the Wildlife Area, they had no direct knowledge of these species actually attempting to nest in the grasslands of Sauvie Island, as no survey study had been completed to date to indicate the presence of those species during the nesting season. This is a key point, as the OCS, under Conservation Actions for these species, all four species note “Minimize disturbance during breeding season *at known nesting areas*”.

Mr. Nebeker also stated that there were "studies" on the Internet demonstrating the impact of dog training on ground-nesting birds. During my Internet research prior to that meeting, I found studies concerning the Western meadowlark, none of which applied to Oregon. Studies found at the USGS concerning the Platte River Valley area in Nebraska indicated to me that, at least for the Western meadowlark, data and conclusions from one geographical region cannot automatically be assumed to hold true in another region. When pressed, Mr. Nebeker was only able to actually cite one study on the impact of dogs on ground-nesting birds. That study was conducted in Wales, and was done in woodlands, not in grasslands.

The dog training community feels they are singled out on this issue. Our dogs know their purpose when they are hunting, and are not interested in non-game birds, and in the 15 years I've been on Sauvie Island, I have yet to see a dog disturb a nest. Yet there was no discussion of restricting cattle grazing, ground management activities such as mowing, or other permitted uses on this same ground during the same time frame, nor of the potentially greater impact of wild canids, rodents, raccoons, skunks, and feral cats on nesting birds.

In short, dog trainers and trial-holding clubs were summarily restricted from areas used historically for dog training and trials, without a chance for input to work toward a compromise that would benefit both the dog training people and the wildlife on Sauvie Island, and without any data to back up the claim that our use of the Wildlife Area was in any way detrimental to the species cited as the reason for the change. While Wildlife Area staff later rescinded the administrative decision to deny access from April 15th through August 1st to the grounds historically used by the pointing breed dogs, there is nothing under the current management plan that will prevent a similar impulsive restriction in the future. To give certainty to the pointing dog community that this will not happen again, I ask the Commission to amend the SIWA Management Plan to give those of us who train our dogs at Sauvie Island protection from similar restrictive administrative rules.

Thank you once again for the opportunity to have my comments entered into the record today.



West Multnomah
Soil & Water Conservation District

Exhibit #1 -
Dick Springer
Sept. 2, 2010



Exhibit H -
Sauvie Island



September 2, 2010

Oregon Department of Fish and Wildlife Commission
Oregon Department of Fish and Wildlife
34060 Cherry Ave NE
Salem, Oregon 97303

Dear Members of the Oregon Department of Fish and Wildlife Commission,

Thank you for the opportunity to comment on the Sauvie Island Wildlife Area Management Plan. We also appreciate the opportunities afforded to us by Mark Nebeker and staff at the SIWI to discuss the plan as it was being developed. 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 plan's 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.

There remain a few significant areas where we believe that the plan could still be improved and/ or where issues appear unresolved. However we appreciate the commitment expressed in the "Summary of Issues" document to continue to work with Audubon and other conservation groups to work through these issues over time. We have always found Mark and his crew to be collaborative, constructive and accessible. We outline those issue for your consideration as well in this letter.

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. There are approximately 2000 identified IBAs nationwide.

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

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Portland, OR 97210
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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 600-1500 people to the island to learn about its wintering raptor populations;
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, invasive species removal at Wapato Access Area 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.

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

1. **Public Process:** While we appreciate the accessibility of the SI Wildlife Area staff to discuss this plan, we do believe that the formal process could be improved. 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 or in individual meetings. 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.

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- 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 addressing the needs and interests the birding and wildlife watching communities and better balancing these activities with traditional activities such as fishing and hunting. We greatly appreciate the significant progress that has been made in developing language towards this end in successive drafts of the Management Plan. We would point specifically to Objective 3.3, Strategy 2, which states:

Develop additional viewing facilities and opportunities such as viewing areas, observation decks, photo blinds, developing an auto tour route and potentially allowing limited access to closed areas, all of which need to be compatible with fish and wildlife management objectives. These improvements would likely occur on the Oak Island and Eastside Units of the wildlife area, especially along Reeder and Rentenaar Road.

We look forward to working with SIWA staff to develop these opportunities and suggest that the SIWA staff convene a small stakeholder working group to assist in this process. Among the strategies that would specifically like to see considered are 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.
- 3. Management for Canada and Cackling Goose Habitat:** We are deeply concerned that the Management Area is being converted into a Canada and cackling 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

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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 with 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. Continue to work with the farm community to develop hazing strategies and incentives to deal with Canada/Cackling Geese on private lands;
 - c. Better evaluate the incremental value of conversion of refuge habitat for goose forage--how effective is this strategy for reducing depredation on private lands;
 - d. 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;
 - e. 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.
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;
5. **We urge you restore the three dog limit and the limitations on commercial dog training activity and to restore the more natural resource protective language pertaining to dog training in the June Draft (Objective 3.2):** We are disappointed that ODFW chose to remove the three dog limit in Objective 3.2, as well as the associated Strategy 4. We believe that these were sound provision of the prior draft and their removal is at odds with the commitment to prioritize natural resource protection. In addition, the language prioritizing nesting birds for dog impacts has been significantly watered down from the June 2010 draft.

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June 2010 Draft:

The department also recognizes that dog training/trials during the period of April through July may impact ground nesting birds. As part of the implementation of the OCS, the department will be managing pastures/grasslands specifically to benefit nesting songbirds.

September 2010 Draft:

The department also recognizes that dog training/trials during the period of April through July may impact ground nesting birds. As part of the implementation of the OCS, the department will be managing these pastures/grasslands, compatible with other management objectives and uses.

We believe that this unfortunately acquiescence sends exactly the wrong message to other user groups that have supported restrictions on their activities in order to support wildlife objectives. It also sends the wrong message to the dog owning general public which is required to leash their dogs on the refuge in order to protect wildlife. We request that you restore the requirements and language found in the June 2010 draft on this issue.

- 6. 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.
- 7. 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

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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. ODFW is already actively involved in the Intertwine Alliance via the Clackamas Office but we also encourage the Sauvie Island Management Area to become actively involved in the Intertwine Alliance and to view the Alliance as a potential vehicle for integrating the objectives of the management area into funding, biodiversity, recreational and environmental education strategies at the regional level.

- 8. Species and Habitat specific prioritization and strategies:** Significant improvement has been made in the final draft in providing a greater level of specificity and detail regarding its connection to the OCS. However, there are four areas that we would highlight as still needing additional work:
- a. Targets for oak habitat and grassland habitats in our opinion remain insufficient.
 - b. The final draft fails to see clear targets for shorebird habitat.
 - c. The final draft fails to address invertebrate species.
- 9. West Nile Virus:** 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.

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

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