Public Correspondence

Public Correspondence that has been received as of August 17, 2010
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# Wolf Correspondence Log

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Christina A Schmidt

From: ODFW Comments
Sent: Tuesday, May 11, 2010 4:19 PM
To: Russ Morgan; Michelle Tate; Craig Ely
Subject: FW: Wolves.

From: Christian Watts [mailto: cwatts@farmersagent.com]
Sent: Tuesday, May 11, 2010 9:24 AM
To: ODFW.Comments@state.or.us
Subject: Wolves.

I, as a 42 year citizen of Oregon, want to express my concerns regarding the wolves here in Oregon. We do NOT want them. We DO want more game to hunt, deer, elk, turkeys, etc. We are having a hard enough time trying to keep stable herds of mule deer as it is and we can see from Idaho and Montana what will happen to the elk herds if we let this go unchecked.

If you all wish to run a pack of wolves in the Willamette Valley around Salem then I am all for it but PLEASE lets NOT let them ruin our hunting heritage in the North and East of Oregon ....Not to mention thye loss suffered by those ranchers out there.

Watts, FARMERS Insurance and Financial Services
10580 SW McDonald St  Ste 101
Tigard, Or   97224
PH# 503601 0351   Fax# 503 619 0800   Cell# 503 998 6846
End the State endangered species protection on wolves and allow people to shoot them to protect pets and livestock and other humans.

--

word <robrites@gmail.com>
Please de-list wolves from the state endangered species act. Allow the shooting of wolves that endanger humans, pets and livestock. Thank You.
Robin Townsend   Imnaha, Oregon
--
word <robrites@gmail.com>
From: Matt Puntney [mailto:razorsedge023@yahoo.com]
Sent: Monday, May 24, 2010 11:20 PM
To: ODFW.Comments@state.or.us
Subject: Canis Lupis

ODF&W,

I have just perused the outline for your plan regarding the grey wolves seeking new homes in Oregon. I think this is a well designed, well thought out management plan. However, I hope that you do your best to keep the wolves on the Oregon T&E species. The grey wolf is a keystone species, and so much in their ecosystem depends on them. The Yellowstone wolf project shows just that. I’m not suggesting a full on reintroduction by any means, and am certainly in favor of any rancher eliminating any wolf that is killing/molesting any form of livestock. I understand this is a sensitive issue, and am happy to continue to follow your updates online. Good work so far.

Matt Puntney,

Redmond, OR
After reading your wolf plan and noting spring of 2010 as a time to review I would like share my opinions with you. I don’t know what groups you talk with. I am an average citizen living in Wallowa County.

There are many reasons people choose to live here. For me and my husband it is the open land that keeps us here. We spend our non-working time getting out in the forest and beautiful areas surrounding us. My husband works in the woods and has learned to deal with cougar threat often. These are dangerous beasts we are forced to expose ourselves to if we find the outdoors more engaging than going to a mall. Luckily, we are allowed to kill a cat if he threatens us or our pets during an encounter. The wolves are an entirely different manner. It seems to me you are not being very realistic about the threat to Eastern Oregon. We have made many sacrifices to live in this isolated county. Because of our love of the outdoors we don’t mind. Now, there is a new concern. This plan doesn’t even make sense to me. Why do we need wolves here? Already the cougar have done great damage to the deer and elk herds. Once we saw herds every time we ventured out. The herds over the last thirty years have gotten smaller and smaller. Now introduce another predator. Who is watching out for the other wildlife?

We haven’t yet discussed domestic animals, pets and people. Already there are signs the wolf has lost some of his fear. How long before they are bold enough to challenge humans. Realistically you have to know it won’t take long. One litter of pups that has never seen a litter mate die of a gun shot wound, never felt the pain of a non lethal bullet wound, and they don’t know to be afraid.

Right now they are feasting on our stock. They are breeding well and populating this county. When will it be enough? Personally I think it is grossly irresponsible to reintroduce them. Well, they are here. We can’t protect ourselves from them. Your decisions have jeopardized my pursuit of happiness. I must limit in my wanderings for the safety of myself and my dog. Is this what you intended? If not, now is the time to change the rules. Look at your plan and be realistic. Let’s not dream. Let us make good strong logical decisions in which we find human beings to be our first priority. Wolves are dangerous predators. We don’t need them here. There is a basis for all the irrational fear people have. Fairytales were developed to teach our children lessons so they would be safe in the world. Now we dumb down our “Grimm’s Brothers” so we won’t scare the children and introduce wolves into their world and tell them they are doggies.

Let’s regain some common sense, shall we?

Sincerely,

Denise Rautenstrauch
202 Litch Street
Enterprise, Or 97828
June 15, 2010

Oregon Department of Fish & Wildlife
3406 Cherry Ave. NE
Salem, OR 97303

Subject: Oregon Wolf Conservation and Management Plan

It is our understanding that the Oregon Fish and Wildlife Commission is requesting public comment regarding the Oregon Wolf Conservation and Management Plan. We appreciate the opportunity to provide our comments.

We purchased a home in the Inmaha/Joseph area in 1991 and were able to retire and move to the home permanently in 2002. We are grateful to live in such and beautiful and friendly place. Many of our neighbors are ranchers/stock growers who deserve and receive our utmost respect for the incredibly difficult work they do so well, their respect for the land and all of its inhabitants, and their love of family and community. We feel privileged to call them friends.

The attached comments related to the Oregon Wolf Conservation and Management Plan stem from concerns for our own personal safety, the safety of our neighbors, and concerns for the extreme additional difficulties placed on stock growers because of the increased presence of wolves in our area.

Sincerely,

Clay and Carole Davis
In the following, the and or are italicized and the parts that we would like to see changed are highlighted. Below the italicized part is what we would like the rules to say and our justification for it.

**The Rules 635-110-0010 Harassment and Take of Wolves during Phase I (Conservation)**

(2) Non-injurious harassment.

(a) Subject to the conditions specified in paragraph (c), the following persons may use non-injurious harassment against wolves without a permit:

(A) landowners (or their agents) on their own land; or
(B) grazing permittees legally using public land under valid livestock grazing allotments.

(b) Non-injurious harassment means scaring off a wolf (or wolves) without doing bodily harm, and includes (but is not limited to) firing shots in the air, making loud noises or otherwise confronting the wolf (or wolves).

(3) Non-lethal injurious harassment.

(a) Subject to the conditions specified in paragraph (c), in addition to state or state authorized agents, the following persons may use non-lethal injurious harassment against wolves by permit:

We would like all of the "non-injurious" methods and definition put in the glossary of the Plan. The reason why is because the landowners were already practicing non-injurious and non-lethal injurious methods according to the plan. Some had even gone the extra mile to bury or move their bone piles so not to attract the wolves. When a depredation occurred, ODFW would not take any action beyond saying that they were moving to non-lethal actions because landowners were just doing “preventative” measures and the landowners needed to be doing non-injurious actions. When asked what actions were considered “non-injurious” many of the actions mentioned were the same as what the landowners had been doing. Since preventative is not in the Plan or the Rules and there is some confusion as to what non-injurious entails, we would like to see it clarified better and some of the other methods, such as moving bone piles, included so it counts toward doing non-injurious actions.

In an area where wolves are located and ODFW has notified producers of the risk and producers are practicing non-lethal and non-lethal injurious measures on a regular basis, if one depredation occurs, a caught-in-the-act permit, including chasing and harassing, should immediately be issued to the producer to eliminate the problem wolf or wolves. If this cannot be done by revisions to the wolf management plan and administrative rules without going through a legislative process, then ODFW should move toward lethal take of the wolf and authorize Wildlife Services to remove the wolf or wolves. If two depredations occur, then Wildlife Service should immediately be called.

**Rule 635-110-0010 Harassment and Take of Wolves during Phase I (Conservation)…..**

(4) Relocation. ODFW will authorize relocation by state personnel when a wolf (or wolves) becomes inadvertently involved in a situation, or is present in an area, that could result in conflict with humans or harm to the wolf. The relocation will be designed to prevent conflict with humans or reduce the possibility of harm to the wolf. The wolf (or wolves) would be relocated to the nearest wilderness area at the direction of ODFW.
The Plan

Translocation's primary intent is to help meet conservation objectives in both halves of the state. It may be used only in areas where dispersing wolves is determined to be essential to achieve conservation objectives. Translocation may be used only following a public process, involving public meetings, public testimony and approval by the Commission. Relocation differs from translocation in that relocation does not require a public process and is not used to facilitate dispersal. (pg 24-25)

We would like to see the relocation and translocation taken out. In Wallowa County, relocating them to the nearest wilderness area, or other areas, does not move them out of human's way. In Wallowa and Baker counties, the wolves have been found to be in the wilderness area frequently, but they have been coming back to the private lands. So moving them to the nearest wilderness area does not work. Wolves also have their territorial areas and will most likely return to where they were. This comment also applies to the same wording under Phase II (Management) and Phase III.

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**Rule 635-110-0010 Harassment and Take of Wolves during Phase I (Conservation).......
(5) Lethal take of wolves in the act of attacking livestock.

(a) Subject to the conditions specified in paragraph (c) and with a permit from ODFW, the following persons may use lethal force against wolves in the act of attacking livestock:

(A) landowners (or their agents) on their own land; or

(B) grazing permittees using public land.

(b) A wolf is "in the act of attacking livestock" if it is biting, wounding or killing livestock.

We would like to add chasing and harassing along with attacking livestock. We would like this added in areas of the Plan and the Rules where it states "in the act of attacking livestock."

Note: The definition of “livestock” in the Rules and the Plan includes rittes, psittacine, horses, jackasses, cattle, llamas, alpacas, sheep, goats, swine, domesticated fowl, any fur-bearing animal bred and maintained (commercially or otherwise) within pens, cages and hutchies, bison and working dogs (herding and guarding).

The definition of livestock does not include domestic dogs that are not working dogs, so a landowner, hiker, recreationist with a domestic dog would not be allowed to take lethal measures to protect his/her dog if attacked by a wolf.

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**Rule 635-110-0010 Harassment and Take of Wolves during Phase I (Conservation).......
(c) Lethal force is allowed by permit from ODFW only if:

(A) ODFW confirms that wolves previously have wounded or killed livestock in the area and efforts to resolve the problem have been deemed ineffective;

(B) The wolf is seen in the act of attacking, not testing or scavenging;

(C) There is fresh evidence of the attack (e.g., visible wounds, tracks demonstrating a chase occurred);

(D) The wolf carcass is not removed or disturbed;

(E) the use of lethal force is reported to ODFW or Wildlife Services within 24 hours;

(F) No unreasonable circumstances exist that attract wolf/livestock conflict; and

(G) either ODFW or Wildlife Services confirms that the wound was caused by a wolf (or wolves).

Note: the Oregon Wolf Conservation and Management Plan calls for allowing lethal take of wolves in this situation without a permit on private land. However, the Plan recognizes that because current
statute requires a permit, implementing this portion of the Plan depends upon amendment of the statute by the legislature.

It would be good to be able to lethally take a wolf at this point without a permit. The permit itself is constrictive in that it goes to the landowner, not the owner of the livestock, and the landowner is liable for himself and whoever is listed as an agent. In many instances the livestock producer is renting the ground the livestock are on. The landowner may not want a permit if they are an absentee landowner, or doesn’t know the livestock producer renting well enough to be liable for them. The owner of the livestock should hold the permit and liability since he/she is the one that would incur the loss in a wolf depredation. The written authorization from ODFW is a better way to go though, because there could be too many mis-interpretations in just a verbal authorization. However, the verbiage on the permit needs to be revised.

We would like to see protection of private property, family and pets near our homes, including the area within 500 feet radius. Home occupant should be allowed to kill wolves without a permit within this area.

Rule 635-110-0010 Harassment and Take of Wolves during Phase I (Conservation)....
(6) Lethal take to deal with chronic depredation.
(a) ODFW may authorize its personnel, authorized agents, or Wildlife Services, to use lethal force on wolves anywhere at a property owner or permittee’s request if:
(A) ODFW confirms that the property or an adjacent property has had either:
(i) two confirmed depredations by wolves on livestock; or
(ii) one confirmed depredation followed by up to three attempted depredations (testing or stalking);

Need to eliminate the word adjacent. Wolves can travel up to twenty to thirty miles in a day which, more often than not, puts them on several different properties. A landowner may have two depredations, but if there is another ownership between the two sites of incident, then it does not count toward the control of the wolves. In Wallowa County there were three confirmed wolf depredations, but they were not on adjacent land and so it did not count toward the legal taking of a wolf by the designated entity. It took more calves to be killed before there were two on adjacent land.

The Plan
In defense of human life, the federal ESA provides that a person is not liable for take of a listed species if the person takes the animal based on a good faith belief that the person is acting to protect someone from bodily harm. The Oregon ESA does not address defense of human life. However, Oregon’s criminal code, ORS 161.200, provides a defense that may justify an otherwise illegal take if the act was necessary to avoid imminent, grave injury to a person (pg 66)

This statement just goes to point out how little support the plan gives to humans. This is a shock to most people when they find out that it isn’t overtly stated that you can protect yourself from a wolf. We would like it better defined on who would be in authority if a person shoots a wolf in what they feel is self defense or to protect another human being. Although it is stated in the plan that attacks on humans are rare, the process needs to be outlined in case it happens. We don’t want happening to us what happened to the man in Idaho that shot the wolf because it was running towards his wife and he felt her life was in danger. He was guilty until he proven innocent, costing him great amount of money and his family
structure. If he had kept quiet, he would not have had the hardship that he had. We don't want people to go through what this Idaho man did. This is why the process and the authorities need to be outlined.

The following is the ORS in the criminal code that may protect us.

ORS 161.200 Choice of evils
(1) Unless inconsistent with other provisions of chapter 743, Oregon Laws 1971, defining justifiable use of physical force, or with some other provision of law, conduct which would otherwise constitute an offense is justifiable and not criminal when:
   (a) That conduct is necessary as an emergency measure to avoid an imminent public or private injury; and
   (b) The threatened injury is of such gravity that, according to ordinary standards of intelligence and morality, the desirability and urgency of avoiding the injury clearly outweigh the desirability of avoiding the injury sought to be prevented by the statute defining the offense in issue.
(2) The necessity and justifiability of conduct under subsection (1) of this section shall not rest upon considerations pertaining only to the morality and advisability of the statute, either in its general application or with respect to its application to a particular class of cases arising thereunder. [1971 c.743 §20]

Other
The following are items we would like inserted in the Plan and the Rules:

All wolves captured or killed must be tested for Diseases (hydatid, neosporosis)
Some of these diseases can be caught by other animals and it would be good to know if there may be a disease problem.

Delisting rules—Change the definition of where four breeding pairs must exist (it currently just counts them on the Eastside of the state) treats the state as a whole for purposes of delisting. The range of these wolves is so much larger than anyone anticipated and with all of the sightings that are on the west side, if these become verified they need to be counted towards the delisting.

If minimum numbers are used to fulfill the requirements for delisting (a “conserved” number) an accompanying maximum number should be adopted beyond which wolves will not be able to grow. We don’t want to get caught in a population explosion of wolves like Idaho did before a measure of control was authorized.
Christina A Schmidt

From: ODFW Comments
Sent: Friday, May 28, 2010 10:28 AM
To: Michelle Tate; Craig Ely
Subject: FW: Wolf Input

Wolf plan comment

From: Barnett, Greg [mailto:BarnettG@Warn.com]
Sent: Tuesday, May 25, 2010 11:50 AM
To: ODFW.Comments@state.or.us
Subject: Wolf Input

Please allow common citizens to protect themselves, pets, and property from wolves. They aren’t endangered; there is multiple hunting seasons in neighboring states and provinces. Also, please limit the population number of wolves; I still want to hunt and want my son to be able to hunt in eastern Oregon. At this time, the future looks bleak. Please protect our livelihoods from the invasive species.

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Christina A Schmidt

From: ODFW Commission
Sent: Wednesday, June 23, 2010 10:08 AM
To: Michelle Tate
Subject: FW: Wolf Plan

Comments on the Oregon Wolf Plan; for October Commission packet. Thanks. – Teri Kucera

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Jeff Jensen

From: Jeff Jensen [mailto:Jeff@jensenconsult.com]
Sent: Tuesday, June 22, 2010 3:59 PM
To: odfw.commission@state.or.us
Subject: Wolf Plan

Gentlemen,
I am a lifelong citizen of Oregon and my family and I have hunted together for my entire 52 years. During this time I have seen several changes in the rules for hunting in our state, most noticeably is the reduction in hunting opportunities available to us. One of the largest changes I have witnessed is the change from purchasing tags the day before seasons opened at the local hardware store to the current situation where we accumulate “points” to be able to hopefully draw tags in areas where our families have hunted for several generations. Due to the uncertainty of garnering a tag in Oregon, I started hunting in Idaho in 1993. I was fortunate enough to be able to fly into the Middle Fork area and healthy enough to be able to “get out” into the backcountry. This area was the area that the wolves were initially released and over the years I have witnessed the growth of the wolf population to the point it is now. I did purchase a wolf tag last year but did not see any wolves during hunting hours. I did see wolves circling our camp at 50-100 yards and heard them howling for hours during the night. I watched them with flashlights on three separate nights. Two years ago, prior to their removal from the endangered species list, I had five of them trot at me to within 15 yards while I was hunting. Though I did not feel “threatened” I can tell you they were not afraid of me, and yelling at them did not cause them to break stride or change direction in the least. The deer in the area did not feel the same. I have also witnessed a degradation of the hunting experience in my hunt area. I have compiled daily logs of the places and times that I have seen game over the years. When I compare the historical numbers and frequency that I spotted deer, elk and big horn sheep to more recent logs, it is obvious that the game numbers are declining. I also know that the number of hunters willing to spend the money to get in to this area of the backcountry and buy tags is declining (one good point). Other factors like winter kill, fires, etc does have an effect on populations, but one cannot overlook the presence of 15-20 member wolf packs and the amount of game one wolf will consume times the number of wolves to come up with a lot of pressure on the resource.
Don’t get me wrong, I am not a wolf hater and think that they have a limited role in a balanced ecosystem. My concern is that the wolf advocacy groups want wolf populations in Oregon over 2200 animals. (http://howlingforjustice.wordpress.com/2010/06/21/help-change-oregons-wolf-management-plan-please-comment-by-june-30/) Wolf management will be one of the most difficult challenges your agency has attempted if you are not adequately prepared for the complexities of working in this emotion laden subject. The wolf advocacy groups do work with hard data and resort to applying human traits to these animals. They give them cute names and show them frolicking with their young. They do not acknowledge that the scene of a wolf kill is a gruesome sight.
I know that there are published numbers of Idaho wolf populations just as there are Oregon wolf populations, but these are acknowledged that they are at best estimates. My opinion is that they are estimates on the conservative/low side.
I encourage your Commission to take a very serious look at the future of all wild game populations in Oregon and the effect that an Alpha predator (wolves) will have on those populations. Do not allow yourselves to get
caught up in the same situation that the Idaho Fish and Wildlife Department has where they have more wolves than they want and no viable method to control them. It is obvious from last year’s Idaho hunters harvest numbers that hunting will be of limited help. Having wolves in Oregon will create additional pressure on our already taxed wildlife herds and be in direct competition with hunters for those animals. This will further reduce the opportunity for me and my family to hunt together. This is unacceptable to me. The ODFW should be working towards increasing opportunities for our families to hunt together.

I am sure that this is not unrecognized by your agency, but wolves do NOT purchase tags or licenses and though you will be tasked with managing them, there will not be any offsetting income to cover those management costs. I recently saw one wolf advocacy group state that having wolves in the Yellowstone ecosystem brought in 33 million dollars/year. When pressed to defend that claim they quickly backed away from the claim and could not defend even 10% of the initial amount. Hunter groups on the other hand have documented proven financial results backing the positive impact that hunting has on the Oregon economy. In these economic times this especially important to the remote areas of Oregon that have been hit the hardest.

Please reconsider the impact even a small wolf population will have on our state because as they say “once this genie is out of the bottle, it will be very hard to put it back”.

Thank you for your time.

Jeffrey A Jensen
11375 NW Blackhawk DR
Portland, OR 97229

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Oregon Fish and Wildlife Commission
3406 Cherry Avenue N.E.
Salem, Oregon 97303

June 25, 2010

Dear Chair Rae and Members of the Commission,

The Oregon Hunters Association is submitting the following comments in relation to the Oregon Wolf Conservation and Strategy Plan. These comments are a compilation of observations of the OHA Board of Directors, OHA Chapter Presidents and members of OHA from all parts of the state. We are hopeful that members of the Commission will study these comments carefully and implement them when making the needed changes to the Plan.

If you have any questions about our document please contact Al Elkins, OHA lobbyist, at (503) 780-6824 or Fred Craig, OHA President, at (541) 218-7976.

Thank you for your careful consideration of our comments.

Sincerely,

Fred Craig
OHA President
Oregon Hunters Association

June 2010

Oregon Wolf Management Comments

Oregon Wolf Conservation and Management Plan and Oregon Administrative Rules

• Anywhere the term "property or an adjacent property" occurs change to "on or near land where damage is occurring". Adjacent property is too restrictive. A wolf can be on land very near where the damage is occurring and not be on adjacent property. This change will make the OAR consistent with the wolf plan.

• Caught in the act permit should be changed to be the same as a regular kill permit. A wolf can be caught in the act and the depredated animal or kill site degraded by other animals making it impossible to prove responsibility by the time ODFW can arrive.

• There should be a maximum number of landowner agents allowed on one kill permit. It is difficult to track a large number of agents.

• Who will make the call as to who verified wolf damage needs to be clarified. ODFW is responsible for wolf management in Oregon and therefore should be making the call. ODFW employees must have the skills and direction to make the correct call in a timely manner.

• The line dividing Oregon into East and West wolf management areas should be changed to coincide with the USF&W Service line.

• There should be no relocation of wolves. Wolves causing damage should be eliminated as they will likely continue to cause problems after moving.

• All domestic animals including pets should be protected from wolves.

• As stated in the plan liberalized options for lethal control by livestock producers must be provided.

• Wolves should be tested for disease at every opportunity, alive or dead. The potential for wolves to carry viruses such as rabies, distemper, parvovirus or parasites must not be ignored. Of particular concern is hydatid disease. If disease is detected in a wild wolf appropriate steps must be taken to protect humans, domestic animals and wildlife.
Oregon Wolf Conservation and Management Plan is failing in the following areas:

- Non-lethal methods are having no impact on livestock depredation.

- Wolf-livestock conflicts are not being resolved before they result in losses.

- Time spent by ODFW biologists must to be tracked and accounted for. ODFW wildlife biologists are spending an inordinate amount of time dealing with wolf issues. Each hour they spend on wolves is one hour taken away from important work related to big game and other wildlife species. Oregon Hunter's Association objects to the use of funds generated by hunter's license and tag fees for management of problem wolves at the expense of hunt able wildlife species. The Wolf Plan leads us to believe hunter fees will not be used for wolf management. There are no provisions in the plan for the use of hunter fee funds to implement the plan. Other resources, both funding and personnel, must be found to support wolf management.
Oregon Dept. of Fish and Wildlife  
Attn: Wildlife Division  
3406 Cherry Ave. NE  
Salem, OR 97303  

June 16, 2010

Re: Wolf Plan

To Whom It May Concern:

I have a few questions that I would like answered. What is the benefit of having the Canadian Grey wolf in NE Oregon? Why are wolves needed? In my opinion the wolf has been gone so long the ecosystem does not need them and it is unfair to the wolf to put it in with humans as wolves and humans do not co-habitat well. I suggest you exam the wolf dilemma in New Mexico and Arizona.

The Preamble of the 2005 Oregon Wolf Plan says on page 6 that the wolf plan is not a re-introduction plan... but a response to wolves that come on their own from the growing Idaho population. (Dec. 1, 2005)

On page 7 of the Oregon Wolf Plan states “wolves will not be captured outside of Oregon and released in the state.”

It is well believed throughout Baker, Union and Wallowa counties that the Canadian Grey wolf was transplanted in the area in the winter of 2005.

The Wolf Plan reads like something that is written from the Center for Biological Diversity, or the U.N. Agenda 21 ideological philosophy and land management ideas that emerged from the Convention on Biological diversity after the Earth Summit meeting at Rio De’ Janeiro and the Kyoto protocols were outlined. Congress did not approve the plan. President Clinton side stepped Congress and started the President’s Council on Sustainable Development. It seems at that point the push for re-wilding the west began.

In January 29, 2005 Bozeman Daily Chronicle, Kelly Wood wrote an article and stated that Michael Scott, a paid advocate of the Greater Yellowstone Coalition, wrote a column rife with error. Scott stated, “In the early 1990s, before the first Rocky Mountain gray wolf set foot in Yellowstone after a 60-year absence ...”

Kelly Wood writes “Those who are familiar with the “wolf re-introduction” plan know:

(1) The wolves dropped into Yellowstone Park were not Rocky Mountain wolves, known in the scientific community as Canis Lupus Irremotus, a smaller animal that hunted in pairs and was the
indigenous species in the Yellowstone Ecosystem. Rather, they were the Canadian Grey Wolf, (the Canis Lupus Occidentalis) a super sized predator hunting in super sized packs that evolved to chase caribou herds for hundreds of miles.  

(2) Federal implementation of wolf introduction has violated the Endangered Species act (ESA) on virtually every count. Dr. Richard Mitchell, PhD., one of the original authors of the ESA, traveled from Washington, D.C., on January 11, 2000, to testify in Billings [Montana] at the Predator Management Symposium. Dr. Mitchell stated to an audience of several hundred, including Sen. Conrad Burns, that it was a violation of the ESA to dump the Canadian Grey [wolf] on top of the Rocky Mountain wolf.  

(3) The Rocky Mountain wolf didn't need to be 're-introduced' -- because it was already there. Locals testified at the aforementioned event to having seen the native wolf in and around the park prior to the "soft" introduction of this "experimental-non essential" predator that was already migrating into Montana naturally from Canada. (The Truth About Those Canadian Wolves Re-Introduction by Kelly Wood 2005)

Fact: The wolves in Idaho have the tapeworm "Echinocococcus granulosus." The adult worms lay eggs that are passed in the feces of the wolf or other canine and is ingested by deer, elk, moose, caribou, domestic sheep and cattle. Then after ingestion the cycle of the parasite begins again.

Idaho’s Department of Fish and Game have been conducting disease surveillance and disease investigations since 1998. The Wildlife Health Laboratory conducted necropsis on 164 wolves between 2005 and 2009. In 2006 E. granulosus was found in the fecal matter and intestinal content. This tapeworm infestation will or already has been exposed to this area. Another parasite that wolves carry is Neospora caninum as well as Cutaneous anthrax which is a form of anthrax that enters your body through a cut or other sore on your skin. The symptoms resemble a itchy bump, like an insect bite that quickly develops into a painless sore with a black center with swelling in the sore and near the lymph glands.

How would you like to be out with your family camping, hiking, picking berries or mushroom hunting and have your pet roll in the wolf or dog feces only to become contaminated or you become contaminated, carries on your clothes or possibly breath it in your lungs and have this parasite attach itself to your organs. Now think about being a rancher and having your herd infected with these parasites.

We, as citizens of this great nation and state, need our federal and state agencies to use true science in the primary role for managing our wildlife.

In 1912 the Rocky Mountain Elk was transplanted in NE Oregon to restock the elk. It cost $1,100. People of Wallowa County raised and donated $300, the Elk Lodge of Oregon donated $232.25 and the remainder was jointly financed by the Oregon Game Commission and the Biological Survey (NW BigGame) It took several years to get hunting re-established in North East Oregon, I believe it was 1933. ODF&W has a point system for drawing tags in Wallowa County, are the elk and deer numbers so high that you have to introduce wolves back into the ecology? Yet hunters are limited to hunt the area having to use a point system to draw a tag.
Introduce the wolves back into the ecology and all of the elk and deer population will dwindle and disappear. With the recent large numbers of domestic livestock that have been killed in Wallowa County shows the Canadian Grey wolf has discovered how easy it is to kill domestic livestock.

The Canadian Grey wolf is not native to this area. The Oregon Department of Fish and Wildlife have introduced a dangerous and invasive species that is a threat to the rancher and communities that rely on revenue from farmers and ranchers as well as tourism revenue.

The counters (college students) were told not to count the lone wolfs when the studies were being conducted to manage the wolf migration as they wanted to re-introduce wolves to the state of Idaho. The science behind all of this in my opinion is junk science to promote the agenda of eco-extremist groups and the UN plan of Agenda 21, in order to drive the people out of the rural areas and into population corridors. This is collectivism!

It is our Constitutional Right to own property and to be able to make and earn a living from our property (pursuit of happiness). The National Forest in this area, were set up as Multiple Use National Forest to help the communities that surrounded these areas. Not to be a Biosphere Reserve for the UN and the Globalist Agenda.

In the publication by Wild Earth in their 1992 special issue titled, “The Wildlands Project Plotting A North American Wilderness Recovery Strategy”, they state “...it is a bold attempt to grope our way back to October 1492...” Their desire to want to recreate what it was like in 1492 is at best a great dream. I think at some point all of us have dreamed what it would be like, what it would look like, in the past. Yes, at best this is a great dream. Evidence produced from research conducted by David Jenkins from the University of Oregon’s Museum of Natural and Cultural History, where he collected samples from the Paisley Caves in central Oregon of people that inhabited the area 14,300 years ago. These samples were analyzed by an evolutionary biologist, Eske Willerslev, an expert in ancient DNA analysis proved that this area was utilized by people as far back as 14,300 years ago. This shows that humans are more native to this area than wolves.

It is also well known, that a contingency of various environmentalist extremist groups would like to re-wild the west “using the wolf to drive the cattlemen out of business.” (Mike Phillips conf. at MN) These groups consist of Hells Canyon Preservation Council, Oregon Wild, (formerly known as Oregon Natural Resource council) Defenders of Wildlife, Nature Conservancy, Wild Earth and the Wildlands Project, a group focused on plotting a North American Wilderness Recovery Act to “return North America to its pre-settled condition of wilderness in order to maintain viable populations of species”. If humans are allowed to live in the buffer zones of the wilderness areas, “humans must be forced to behave in ways that are not destructive to the non-human community if they are to be allowed in the buffer zones surrounding the wilderness areas.” (Reed F.Noss of the Wildlands Project from the Wildlands Wild Earth Special Issue 1992)
Over the last 30 years in Wallowa County has lost a myriad of jobs, from the loggers and saw mills (3 of them) as well as all the business that catered to them. Now the U.S. Forest has a memorandum of agreement or understanding that puts the contracts the Forest Service managed in the hands of a Non Government Agency, Wallowa Resources. Who is an affiliate of Sustainable Northwest. Also at work in Wallowa County is the Nature Conservancy and Wallowa Land Trust to tie up more private land and to help usher in the introduction of wolves to the area is the Hells Canyon Preservation Council. The impact the wolves will have on the ranchers and the income from tourism will be devastating to the economy of Wallowa County.

Our constitutional rights are being infringed upon. These groups would use the law and taxpayer funds to manipulate government agencies and the courts to take away our rights to private property as well as the use of our federal lands. I urge you to use solid scientific data to manage our wildlife and not emotional science. We all have dreams of the past and at times most of us would like to recapture what was once in this country but the past is the past.

With Sincerity

[Signature]

Barbara Thompson
Wallowa, OR
Benton City, WA
Oregon Dept. of Fish and Wildlife

June 30, 2010

Re: Wolf Plan

To Whom It May Concern:

I grew up in the Northwest corner of Montana approximately 20 miles from the “Big Creek” wolf pack near Glacier Park. This herd moved the short distance across the Canadian border in the early 90’s. These marauders spread like lung cancer through the scenic landscape I know and love. They traveled quickly and established themselves with ease. I frequented the mountains every fall and winter as a sporting enthusiast and wildlife videographer. I could not help but notice the rapid expansion of their terrain, and the destruction left in their wake. As you know, NW Montana has snow for about 6 months of the year, tracking their expansion was as simple as looking down, and finding the destruction was as simple as watching for flocks of ravens feeding on the carcasses of the once abundant deer and elk herds. I saw firsthand the destructive nature of these predators, as they decimated first the almost tame mule deer population, then the more elusive whitetail deer population. They have also significantly reduced the population of the majestic elk in many parts of the state. Wolves were protected from humans, so they reproduced a rate unsustainable by their newly acquired “native” prey. They developed a new taste for domesticated livestock. Their taste for livestock increased, and we now see the sheep and cattle herds getting hit.

I have a few questions that I would like answered. What is the benefit of having the Canadian Grey wolf in NE Oregon? Why are wolves needed? In my opinion the wolf has been gone so long the ecosystem does not need them and it is unfair to the wolf to put it in with humans as wolves and humans do not cohabitate well. I suggest you examine the wolf dilemma in Montana (Google Search: calves killed by wolves in flathead valley montana) where you will see that the new policy there is "implementing lethal control as quickly as possible". Do we really need to invite this disastrous cancer to Oregon? Can’t we learn from other states mistakes?

The Preamble of the 2005 Oregon Wolf Plan says on page 6 that the wolf plan is not a re-introduction plan... but a response to wolves that come on their own from the growing Idaho population. (Dec. 1, 2005)

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In January 29, 2005 Bozeman Daily Chronicle, Kelly Wood wrote an article and stated that Michael Scott, a paid advocate of the Greater Yellowstone Coalition, wrote a column rife with error. Scott stated, “In the early 1990s, before the first Rocky Mountain gray wolf set foot in Yellowstone after a 60-year absence ...”

Kelly Wood writes “Those who are familiar with the “wolf re-introduction” plan know:

1. **The wolves dropped into Yellowstone Park were not Rocky Mountain wolves**, known in the scientific community as Canis Lupus Irremotus, a smaller animal that hunted in pairs and was the indigenous species in the Yellowstone Ecosystem. Rather, **they were the Canadian Grey Wolf, a super sized predator hunting in super sized packs that evolved to chase caribou herds for hundreds of miles.**

2. **Federal implementation of wolf introduction has violated the Endangered Species act (ESA) on virtually every count.** Dr. Richard Mitchell, PhD., one of the original authors of the ESA, traveled from Washington, D.C., on January 11, 2000, to testify in Billings [Montana] at the Predator Management Symposium. Dr. Mitchell stated to an audience of several hundred, including Sen. Conrad Burns, that it was a violation of the ESA to dump the Canadian Grey[wolf] on top of the Rocky Mountain wolf.

3. **The Rocky Mountain wolf didn’t need to be ‘re-introduced’ -- because it was already there**. Locals testified at the aforementioned event to having seen the native wolf in and around the park prior to the "soft" introduction of this "experimental-non essential" predator that was already migrating into Montana naturally from Canada. (from The Truth About Those Canadian Wolves Re-Introduction by Kelly Wood 2005)

Fact: The wolves in Idaho have the tapeworm “Echinococccus granulosus.” The adult worms lay eggs that are passed in the feces of the wolf or other canine and is ingested by deer, elk, moose, caribou, domestic sheep and cattle. Then after ingestion the cycle of the parasite begins again.

Idaho’s Department of Fish and Game have been conducting disease surveillance and disease investigations since 1998. The Wildlife Health Laboratory conducted necropsis on 164 wolves between 2005 and 2009. In 2006 E. granulosus was found in the fecal matter and intestinal content. This tapeworm infestation will or already has been exposed to this area. Another parasite that wolves carry is Neospora caninum as well as Cutaneous anthrax which is a form of anthrax that enters your body through a cut or other sore on your skin. The symptoms resemble a itchy bump, like a insect bite that quickly develops into a painless sore with a black center with swelling in the sore and near the lymph glands.

How would you like to be out with your family camping, hiking, picking berries or mushroom hunting and have your pet roll in the wolf or dog feces only to become contaminated or you become contaminated, carries on your clothes or possibly breath it in your lungs and have this parasite attach itself to your organs. Now think about being a rancher and having your herd infected with these parasites.

We, as citizens of this great nation and state, need our federal and state agencies to use true science in the primary role for managing our wildlife.

In 1912 the Rocky Mountain Elk was transplanted in NE Oregon to restock the elk. It cost $1,100. People of Wallowa County raised and donated $300, the Elk Lodge of Oregon donated $232.25 and the remainder was jointly financed by the Oregon Game Commission and the Biological Survey (NW BigGame) It took several years to get hunting re-established in North East Oregon, I believe it was 1933. ODF&W has a point system for drawing tags in Wallowa County, are the elk and deer numbers so high that you have to introduce wolves back into the ecology? Yet hunters are limited to hunt the area having to use a point system to draw a tag.
Introduce the wolves back into the ecology and all of the elk and deer population will dwindle and disappear as they have in MT. Once the wolves see how easy it is to hunt livestock they will seek out the easiest mammal to hunt again.

The Canadian Grey wolf is not native to this area. The Oregon Department of Fish and Wildlife have introduced a dangerous and invasive species that is a threat to the rancher and communities that rely on revenue from farmers and ranchers as well as tourism revenue.

The counters (college students) were told not to count the lone wolves when the studies were being conducted to manage the wolf migration as they wanted to re-introduce wolves to the state of Idaho. The science behind all of this in my opinion is junk science to promote the agenda of eco-extremist groups and the UN plan of Agenda 21, in order to drive the people out of the rural areas and into population corridors. This is collectivism!

It is our Constitutional Right to own property and to be able to make and earn a living from our property (pursuit of happiness). The National Forest in this area, were set up as Multiple Use National Forest to help the communities that surrounded these areas. Not to be a Biosphere Reserve for the UN and the Globalist Agenda.

In the publication by Wild Earth in their 1992 special issue titled, “The Wildlands Project Plotting A North American Wilderness Recovery Strategy”, they state “...it is a bold attempt to grope our way back to October 1492...” Their desire to want to recreate what it was like in 1492 is at best a great dream. I think at some point all of us have dreamed what it would be like, what it would look like, in the past. Yes, at best this is a great dream. Evidence produced from research conducted by David Jenkins from the University of Oregon’s Museum of Natural and Cultural History, where he collected samples from the Paisley Caves in central Oregon of people that inhabited the area 14,300 years ago. These samples were analyzed by an evolutionary biologist, Eske Willerslev, an expert in ancient DNA analysis proved that this area was utilized by people as far back as 14,300 years ago. This shows that humans are more native to this area than wolves.

It is also well known, that a contingency of various environmentalist extremist groups would like to re-wild the west “using the wolf to drive the cattlemen out of business.” (Mike Phillips conf. at MN)

These groups consist of Hells Canyon Preservation Council, Oregon Wild, (formerly known as Oregon Natural Resource council) Defenders of Wildlife, Nature Conservancy, Wild Earth and the Wildlands Project, a group focused on plotting a North American Wilderness Recovery Act to “return North America to its pre-settled condition of wilderness in order to maintain viable populations of species”. If humans are allowed to live in the buffer zones of the wilderness areas, “humans must be forced to behave in ways that are not destructive to the non-human community if they are to be allowed in the buffer zones surrounding the wilderness areas.” (Reed F.Noss of the Wildlands Project from the Wildlands Wild Earth Special Issue 1992)

Over the last 30 years in Wallowa County has lost a myriad of jobs, from the loggers and saw mills (3 of them) as well as all the business that catered to them. Now the U.S. Forest has a memorandum of agreement or understanding that puts the contracts the Forest Service managed in the hands of a Non Government Agency, Wallowa Resources. Who is an affiliate of Sustainable Northwest. Also at work in Wallowa County is the Nature Conservancy and Wallowa Land Trust to tie up more private land and to help usher in the introduction of wolves to the area is the Hells Canyon Preservation Council. The impact the wolves will have on the ranchers and the income from tourism will be devastating to the economy of Wallowa County.

Our constitutional rights are being infringed on. These groups would use the law to manipulate the courts to take away rights of private property and the use of our federal lands. I urge you to use solid scientific data to manage our wildlife and not emotional science. We all have dreams of the past and at times most of us would like to recapture what was once in this country but the introduction of a non native destructive species is not the way to get there!
June 10, 2010

Oregon Governor, Ted Kulongoski
Director, Oregon Department of Fish & Wildlife
State of Oregon Legislative Senators and Representatives

This letter is notification of my disapproval of the current lack of management of the Wolf Program in Eastern Oregon, specifically Wallowa County.

As a resident of Wallowa County, not to mention a taxpayer and voter, I am appalled at the disregard of the seriousness of this situation.

It is questionable as to how this situation has exploded this year. There have been confirmed sightings of Wolves all over Eastern Oregon. Could it be that they are being released by individuals, organizations or tribes of people? That would explain the explosion of the Wolf population to the extent that it has been documented throughout Eastern Oregon.

Our ranchers, large and small operators, are suffering “Wolf kills” and with very little, if any, assistance from ODF&W.

The Wallowa Mountains and Valley is one of the most desirable recreation areas that this great State has to offer. This lack of Management will have an effect on our local tourism because who in their right mind will want to vacation with their children and pets in Wolf infested areas? I won’t even go into the devastation of our already dwindling elk and deer herds.

Our economy has already been crippled by the lack of timber harvest in this area; we cannot survive another attack on our remaining industries.

I am requesting written notification of the future actions regarding the Wolf Plan.

PLEASE ADD MY NAME TO THE LIST OF THOSE WHO OPPOSE THE INTRODUCTION OF WOLVES INTO OREGON.

Respectfully,

Margaret L. Kassahn
80981 Joseph Hwy
Joseph, OR 97846
Here are a few thoughts and the email and mailing addresses.

- We would like to see the relocation and translocation taken out of the wording of the ESA. In Wallowa County, relocating them to the nearest wilderness area, or other areas, does not move them out of human’s way. In Wallowa and Baker counties, the wolves have been found to be in the wilderness area frequently, but they have been coming back to the private lands and adjacent public lands. So moving them to the nearest wilderness area does not work. Wolves also have their territorial areas and will most likely return to where they were.

- The plan states that Wildlife Services will be the lead agency in livestock depredations. We believe this includes confirming livestock kills, W.S. has the expertise in this field and ODFW should make any changes in Rules that they wrote to recognize W.S. in this capacity. ODFW should be using their funds for management such as identifying, tracking and collaring wolves. You can e-mail comments to ODFW.Comments@state.or.us

Mail comments to Comments Wolf Plan Headquarters Office ODFW

3406 Cherry Ave. N.E.
Salem, Oregon

97303-4924

I feel the wolves need to be relocated for their safety and the safety of the people and livestock of Wallowa County.

Margaret Keasahn
June 26, 2010
65264 Steen Rd.
Joseph, OR 97846

To Whom It May Concern:

Understanding that this is the time for public comments concerning a change in the “wolf Plan”, we would like to offer the following.

Currently we have our herds on lands homesteaded by family two generations back. As this is written, the rendezvous area is a short distance from our animals, our interest in pro-human changes is up close and very personal.

When there were no wolves here, the current plan was working great. However, having the wolves here in eastern Oregon the last couple of years, the romantic idea of having wolves amongst us, has brought to those living here harsh realities. Wolves and cattle in this same area is a recipe for eventual confrontation and waiting disaster.

First, a single group, ranchers, alone is directly suffering financial loss. Not only do we suffer loss when our cattle are attacked and calves killed. (Please note that all the calf kills have occurred on private land.) Our herds are stressed, affecting the health and weight gains of both mother cows and calves. While our personal herd has had no calf kills thus far, we lost a cow to a perforated abomasal ulcer. Similar to stomach ulcers in humans, abomasal ulcers in cattle are directly related to stress. In addition, the ranchers are suffering financial loss in fuel and transportation cost in the constant surveillance needed on our herds. A third cost is the physical health and well-being of the cattle owners. We are hard working people, putting 70-80 hour work weeks on a regular basis. The wolves have placed another high stress on our lifestyle and added many hours to our already full days.

Secondly, the current law does not allow livestock owners to protect their animals from wolves. Current law is written so that we have no “right” to protect our livestock, even if we were to observe a pack of wolves attacking and killing our livestock, which could include cattle, sheep, goats, horses, llamas, as well as our stock dogs. This kind of law violates the basic constitutional right that we have as Americans to have the ability to protect our property and livelihood. It seems the government’s only role under the current law is to protect the wolves; allowing them to kill at their own whim. In our view, the current law is immoral and should be changed to allow livestock people to protect their livestock.

Third, all Oregonians are paying indirectly for the wolves. In a day where schools, police, firepersons and others essential services are hurting for funds, the wolf experiment is draining our state of much needed resources. Tracking the collared
wolves, keeping the landowners notified has required almost unlimited man hours. Add to that the expense of electronic equipment and airplanes tracking the wolves, and it is not an insignificant amount of money being spent on this failing program. Next, future hunting revenues needed by the state will drastically be reduced as elk and deer populations are affected. Then with fewer hunters coming, local small businesses will be hurt, again affecting the state coffers.

America's economy is in trouble today. Fewer private industry jobs are supporting a growing bureaucracy. Agriculture produces a much needed product-food. The introduction of wolves can mean the difference between staying in business and going out of business.

The wolves in Eastern Oregon are hurting all Oregonians either directly or indirectly. Please review and change the wolf plan so as to value people above wolves. The current plan does not.

Sincerely,

Mike Lathrop
Annette C. Lathrop

Mike Lathrop DVM
Annette C. Lathrop
Christina A Schmidt

From: Colleen R Munson  
Sent: Tuesday, June 01, 2010 4:46 PM  
To: Michelle Tate  
Subject: FW: Wolf permits 

M – what happened with this one?  

Thanks!

From: ODFW Commission  
Sent: Wednesday, May 26, 2010 1:09 PM  
To: Michelle Tate  
Subject: FW: Wolf permits 

M – Can you help this citizen?  

Thanks!

From: Kurt Swinburnson [mailto:kurt@kurtswinburnson.com]  
Sent: Wednesday, May 26, 2010 10:31 AM  
To: ODFW Commission  
Subject: Re: Wolf permits 

I have property near Elk Mountain, Wallowa County, on which several of us ranchers leave cows for summer pasture. I understand there is a procedure for securing permits for wolves that are killing livestock. We know they are occasionally in the area and have made some kills in that immediate area. Let me know how I can secure a permit for myself and the others having cows there.

Kurt D. Swinburnson  
Attorney at Law  
6474 Kahele Street  
Kapaa, Hawaii 96746  
Phone: 808 821-1922 Fax: 808 821-1924

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Every picture in this website has been verified for accuracy. There are no staged shots, kills of other animals or winter kill. ALL dead animals in this site are confirmed Wolf Kill.

Many pages are narrated. Don’t hear it? Click the Speaker on each page.

These slides show a side of the wolf the radicals don’t want you to see but ignoring the problem will not make it go away. Our mountain ungulate are systematically being eradicated.

Most people won’t be able to go through all these slides. There are 48 in total.

Not the little puppy dog you thought, right? If you were a foot tall and one of them came up and put their front paws on your shoulders, they would look down on you.

The facts in this site are clear. If you are Pro-Wolf you are Anti Every Other form of Mountain Ungulate to include even Dogs and Livestock.

If the narration stalls out, try back spacing to a previous slide and going forward again.

RECEIVED
JUL 09 2010
WILDLIFE DIVISION

http://www.saveelk.com/wolf_002.htm
They kill, eat a little and move on to the next kill.
Christina A Schmidt

From: Michelle Tate
Sent: Wednesday, July 14, 2010 10:52 AM
To: Christina A Schmidt
Subject: FW: COMMENTS ON WOLF PLAN

From: Helen Scott [mailto:hscott@uci.net]
Sent: Wednesday, July 14, 2010 10:40 AM
To: odfw.info@state.or.us
Cc: hscott@uci.net
Subject: COMMENTS ON WOLF PLAN

7/14/10

To: ODFW

From: Helen Scott
346 Bickford Dr.
Grants Pass, OR 97527

Please accept this email as my comments for the Oregon Wolf Conservation and Management Plan.

The Plan is to consider the economic and social interests of all Oregonians. As a fourth generation Oregonian living in SW Oregon, I have interests in both the economic and social sides of the plan.

I believe the only economic benefit from the Oregon wolves is to the preservationist non-profits, the attorneys who file their suits and the employees of the court systems. Since rising court costs are a liability to the taxpayer, this is a downside to any economic benefit.

The wolf population in Oregon should be managed. The delisted number of wolves required to survive should apply for all of Oregon. There should be an annual quota for Oregon, and until that quota, such as kill down to 6 pairs is met, there should be no restrictions for killing a wolf. Quotas are not new with the cougar as an example. There are enough wolves in Idaho and Montana to remove any danger of the wolf being extinct.

The state needs to protect the economic interests of its remaining businesses, especially in agriculture. My county, Josephine, as of yesterday, had an unemployment rate of 14.5%; the state is at 10.5%. In my county, the true percentage is much higher because many people, in construction, for instance, were never on the rolls to start with. I, and my fellow Oregonians, are better off with reduced food prices. Reduction in prices does not come with Oregon wild animals being allowed to kill livestock. There should be no time lapse between seeing a wolf attack and legally killing a wolf.

The state must recognize the consequences of a livestock kill in a herd. The remaining animals are stressed and become more difficult to manage over the term of their commercial life. When animals get stressed, they are much like humans: they do not thrive. These consequences add to the costs of the producer and impact my economic life, which, when combined with the economic life of others in the wolf, actually adds up.

It is simple. On the economic side, ranchers are hurt economically by wolves and I am hurt economically when Oregon meat becomes more expensive to produce or ranchers go out of business due to restrictive Oregon laws and regulations.

On the social side, as a person who enjoys going out in the woods and fields of Oregon, I am concerned with my safety. This is part of my health and welfare to not be stressed by my surroundings. I want no bureaucracy telling me I cannot kill a wolf if I perceive a danger. On the health side, I appreciate knowing where my meat comes from and purchase Oregon meat products. The consequences of wolf livestock kills increase meat producing costs. This is bad.

Hazards from wolves are expensive. Wolves are costly to Oregonians. Wolves are not tourist attractions. The State of Oregon and the residents of Oregon are experiencing severe reductions in income. The state must recognize this problem and reduce expensive requirements for its citizens.

Thank you for this opportunity to comment.
Christina A Schmidt

From: ODFW Commission
Sent: Tuesday, June 01, 2010 4:10 PM
To: Michelle Tate
Subject: FW: Hunter Orange, Wolf Issue

For the Commission packet. – Teri Kucera

From: charles ireland III [mailto:fishnwithcharles@yahoo.com]
Sent: Monday, May 31, 2010 8:27 PM
To: Ronald.E.Anglin@state.or.us; Curt.melcher@state.or.us; Roy.elicker@state.or.us; odfw.commission@state.or.us
Cc: fishnwithcharles@yahoo.com
Subject: Hunter Orange, Wolf Issue

I do believe that wearing hunter orange is a good idea, but don't believe wearing it should be manditory. I do believe it should be left up the the hunter as we are responsible for our own personal safety, I don't believe that is the job of ODFW.

As for the wolf issue, I feel that ODFW hasn't taken much of a positive stance on this, and yes I know this is a federal issue BUT I also know that ODFW is in support of re-introduction of wolves, that is a real shame. A hundred years of game management is on the verge of being flushed down the toilet, those who disagree don't have the facts or have a personal agenda, they need to take a real hard look at what has happened in Central Idaho, NW Wyoming, and SW Montana, all of this on top of a cougar problem doesn't give me much faith that ODFW has hunters/taxpayers and good management of wildlife in their best interest. I must tell you that more and more of my fellow friends and hunters are really fet up. Myself and many fellow hunters have recently started hunting others states because of the quality of hunts offered. Its sad that my life long home state of Oregon is the "back up state" for the fall hunting season. Im praying to God that I draw my NE oregon elk tag this year, I feel this will be the last opportunity for a quality elk hunt in that area. I know that in few years the elk population in that corner of the state will be in an irreversible downward spiral, that's heartbreaking. For you, the game managers of the state, you better be loosing sleep over this issue because ultimately this will lay in your lap for the public to judge.

Lifetime Oregon Resident and Taxpayer
Charles Ireland
To whom it may concern:

The idea that you can “manage” wolves is totally absurd. I am a native Oregonian from Medical Springs, Pondosa and Baker. My reasons for commenting is that now, as a resident of Idaho, I don’t want you to fall into the same trap as did the wolf “managers” in this state. I have hunted my entire life. I spend a lot of time in the woods either hunting or helping friends gather cows off the forest. The wolves in Idaho have decimated the elk in certain areas and have had a real negative impact on deer herds also. As you know, Idaho opened a wolf season. Big deal. The number of kills won’t have any positive impact at all. Killing wolves should be open to all ranchers, sheepmen and hunters three hundred sixty five days a year.

Thank you,
Jim Garrett,
Star, Idaho
Why are we protecting these predators? Why is it that none of you understands that history always repeats itself? Wolves were erased from Oregon for a reason. Now that we have more human population, you all think it is prime time for reintroduction of wolves? Look at the arguments used for reintroduction to Yellowstone. It has become completely evident that reintro to Yellowstone was nothing but a huge pipe dream, and I do mean someone had to be on the "pipe" not to see the potential problems that would arise. There is no room in this state for large predators, like these, that kill for sport, and we all know they do, so don't try to pound sand up our backsides anymore and tell us otherwise. This reintroduction plan does not one thing good for our deer and elk populations and you all know it. I am sorry, but this reintro plan has all the same stupidity written all over it that most "liberal" minds put into most ideas that they come up with. Go back to school and take history over again. It always repeats itself. Why not learn from it instead of doing the same things over and over again. Please stop the wolves!!! This is not a good thing and it will only get worse.
Dear ODFW,

I don't want wolves. I want you to take care of the deer, elk, sheep, pronghorn. We pay you to take care of our big game, you have not done that!!!!!! Now you want to introduce another preditor into the mix, just because its politically correct. The entire commission should be fired. NO Wolves

Calvin Clark
502 hillcrest rd
John Day,, OR 97845
I do not like the increasing numbers of wolves in the state of Oregon. This state has little territory to support such an animal and I do not see how the state can manage animals such as elk and deer who are consumed by an animal that does not afford similar management, as we have seen with the wolves in the Imnaha.

My husband and I have hunted the Imnaha and in the last few years the deer population has dropped dramatically and the elk population is beginning to drop. We may not have the biologist numbers, but we can see it in the use of the land.

Are we supporting a non-native species of animal in our state? Is it true that these grey wolves are native to Oregon? If not, this is an irresponsible use of our taxes and ODFW fees. Not appreciated by this resident.

Even if they were native to this land, is there a place for them now? Should their numbers not be managed just as deer, elk and cougar must be?

It sounds nice that wolves are making a comeback, but the reality of this is not necessarily the right thing to support for our state.

Thank you

Lori

Lori Black
Drain, OR

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Re: Wolf Plan

To Whom It May Concern:

I grew up in the Northwest corner of Montana approximately 20 miles from the “Big Creek” wolf pack near Glacier Park. This pack moved the short distance across the Canadian border in the early 90’s. These marauders spread like cancer through the lungs of an addict. They traveled quickly and established themselves with ease, decimating the once abundant deer and elk herds. At the time, Fish and Game welcomed the wolves along with all the more populated parts of the state as novel and glamorous. I frequented the mountains every fall and winter as a sporting enthusiast and wildlife videographer. I could not help but notice the rapid expansion of their terrain, and the destruction left in their wake. As you know, scenic NW Montana has snow for about 6 months of the year, tracking their expansion was as simple as looking down, and finding the destruction was as simple as watching for flocks of ravens feeding on the carcasses of the once abundant deer and elk herds. I saw firsthand the destructive nature of these predators, as they slaughtered first the almost tame mule deer population, then the more elusive whitetail deer population. They have also significantly reduced the population of the majestic elk in many parts of the state. Wolves were protected from humans, so they reproduced at a rate unsustainable by their newly acquired “native” prey. They developed a new taste for domesticated livestock. Their taste for livestock increased, and we now see the sheep
and cattle herds getting hit. Montana had to set aside funds to pay the ranchers for the all the
damage caused by this cancer "Canus Lupus".

I have a few questions that I would like answered. What is the benefit of having the Canadian Grey wolf in NE Oregon? Why are wolves needed? I suggest you examine the wolf dilemma in Montana (Google Search: calves killed by wolves in flathead valley montana) where you will see that the new policy there is "implementing lethal control as quickly as possible". Their new policy suggests that this experiment may have lost it's glamour. Do we really need to invite this disastrous cancer to Oregon? Can't we learn from other states mistakes? Don't light the cigarette you're teasing. I fear that if you do, twenty years from now Oregonians will be in the same situation Montanans are now, wishing we could radiate the whole mess of them.

In your decision making process, please be intellectually honest with yourself. Don't let the national glamour blind you. Is the Canadian Wolf going to contribute anything good to Oregon? Or will they merely cause headaches and liabilities for decades? Keep in mind that if a citizen had a pet this destructive to public and private property, the owner would be arrested.

Sincerely,

Cullen Wagner
Corrected comments

My family lives and ranches in Wallowa County we raise hay, wheat, cattle and sheep. The invasion of the Grey wolf will take a serious toll on what natural resource based economy that we have left. As a producer I think it is ridiculous that I don't have the legal right to protect my property until after we suffer a confirmed loss. We have had confirmed losses all around us. The Wolf Plan needs, at a bare minimum, to be changed so that when a wolf is on private property or threatening private property they could be treated as the predator that they are. I would have that right with any other predator. I would have that right if a trespasser was in my home. The United States was founded on the promise of owning and being able to protect private property. Our ancestors couldn't peacefully co-exist with the wolf what makes us think we can.

Sincerely: Dan Butterfield
I am a private property owner. My wife and I pay taxes to the state of Oregon on income earned from the raising and sale of hay and cattle.
The introduction, not re-introduction, of Canadian Gray wolves on private property is illegal and should be stopped. The following are points I’d like to be made part of this “Wolf Plan” process:

1. Canadian Gray wolves are not indigenous to Oregon. This does not qualify them for Endangered Species Act protection. This alone should negate any further discussion, but I will continue:
   2. The Canadian Gray wolf is not an endangered species.

3. Since the Canadian Gray wolf is not indigenous to Oregon, why does the boundary for their protection stop at Oregon State Highway #95?

4. Has an Environmental Impact Statement been filed? If so, I would like a copy of it.
   Along this line of thought, why are their laws requiring:
   A. imported logs to be fumigated?
   B. fruit inspection points to cross into the state of California?
   C. cattle and horses required to have health certificates to cross state lines?
   D. Wallowa County has an active anti-noxious weed program?
   E. boat inspections at Wallowa Lake for non-indigenous water species?
   F. requirements for certified weed-free hay for pack trips by the U.S.F.S.
   I could go on, but the point is these laws/rules are in place to protect industries from the potential harm caused by the introduction of an invasive species. The Canadian Gray wolf is not only invasive it is highly dangerous and causes great losses to producers through the destruction of their cattle. We have experienced this firsthand.

5. No Canadian Gray wolf should be allowed off Federal ground. Spotted Owl reserves are placed on government ground, either state or federal not on private wherever possible. Private property owners should be allowed to eliminate any Canadian Gray wolf that invades their property.

6. Laws forbidding citizens to protect themselves, their loved ones, and their personal property from the threat of Canadian Gray wolves is totally unconstitutional. I don’t need to be an attorney to read and understand the constitution regarding that. Citizens have the right to protect themselves and their property from harm. The ODFW rules are not legal. It is legal to shoot a dog who is strayed or harassing livestock. It should be the same for Canadian Gray wolves.

7. The State of Oregon needs to prioritize. We’re always hearing how there is not enough tax money to fund education, roads, and police, yet we have enough for this illegal “experiment”?!?

8. Oregon can’t afford it’s current budget and probably never will be able to without drastic cuts. The “Wolf Plan” is all cost with absolutely no benefit whatsoever. The destruction the Canadian Gray wolf causes through very real loss of income borne by the livestock producers of this state becomes a loss to the state revenue also. You can’t tax zero.
9. When Mr. Russ Morgan of the ODFW was asked by my wife, “What is the good side to the illegal placing of wolves?”  His reply was, “I couldn’t say.”

To those people who fantasize about hearing a “hear a wolf howl” I would like to ask them to include the very real image of a pack of Canadian Gray wolves eating their prey alive to “keep it real”.

Dick Tienhaara
producer, tax payer, citizen of the United States of America
6-30-10
Christopher P Schubothe

From: Doug Hopper [doug@valleywisp.net]
Sent: Wednesday, June 30, 2010 9:31 AM
To: ODFW.Comments@state.or.us
Subject: Wolf Plan

Please consider the following comments for improving the Oregon Wolf Plan.

Make it much easier to kill wolves by not limiting kill permits to "caught in the act" and expanding the area where they can be used.

Initiate a more reasonable means of determining if a livestock kill was caused by a wolf. It appears the ODFW wolf coordinator is overly protective of wolves.

Recognize that Oregon does not have sufficient remote land to support wolves without major conflicts and loss of personal property.

The cost of managing wolves should come from the state general fund and not include funds from licenses and tags.

Doug Hopper
La Grande, OR
We believe that the number of wolves currently in Oregon is too large for the wilderness areas available to them..
The cougar population has decimated our big game animal herds and increased the number of hunters who are unwilling to front the money for licenses, tag applications and tag purchases. These sportsmen bring in untold tourist dollars to the local economy when game numbers are up.
As a result wolves are turning to livestock when game is unavailable. Ranchers should be able to protect their cattle herds against both cougar and wolves. These are not hobby farmers with animals in their back yards (though in certain instances, the predators aren't hesitant about attacking in back yards either) but people who depend on their cattle herds for their living.
We agree with the current plan to eliminate some of the wolf population and believe it may need to be extended to larger numbers.

Vernon Huuki
Evelyn M. Huuki  </HTML>
To Whom It May Concern:

We own businesses in Wallowa County and also raise cattle. We have great concern about what is going on with the wolves in Wallowa County and the Wolf Plan as it now reads.

The wolves that have been introduced to our area are not the same as the original wolf that was here. We object to the fact that they were introduced to our area at all. One of the reasons we live here is to be able to enjoy our beautiful area by hunting and riding. With this new threat out there, it is limiting our enjoyment of the area because of the safety factor of having our 4-H kids out on a trail ride and a possible wolf encounter and the horse reactions.

We would like to see changes in the Wolf Plan. Following is our recommendations.

Rules 635-10-0010
2 & 3 --Non-injurious methods do not work. If depredation occurs, a permit should be immediately issued to eliminate the problem wolves.

4--Relocations and translocations should be taken out.

5 a & b--Need to add chasing and harassing along with attacking livestock for lethal force to take a wolf.

5 c--We would like to see protection of private property, family and pets near our homes, including the area within 500 feet radius. Home occupant should be allowed to kill wolves without a permit within this area.

6--Need to eliminate the word adjacent.

Any human should have the right to use lethal force if acting to protect someone from bodily harm.

We would like to see these inserted into the plan:

All wolves captured or killed must be tested for Diseases.

Change the definition of where four breeding pairs must exist--needs to treat the state as a whole for purposes of delisting.

If minimum numbers are used to fulfill the requirements for delisting, an accompanying maximum number should be adopted beyond which wolves will not be able to grow.

At this point the Wolf Plan is managing the people not the wolves.

Thank you,
Greg & Velda Bales
My comment is regarding the Wolf Plan in Oregon. What a goings on in Wallowa County! Countless hours have been spent on this wolf plan and countless livestock have and will be maimed, traumatized, suffer and die while ODFW spends years documenting the results that other states already have to appease the politicians and conservationists. Talk about a state budget crisis. How many million dollars have you spent in Wallowa County and your biologists can't confirm a wolf kill. What about the cost and trauma the ranchers have gone through and the cattlemens representative and Wallowa County officials never signed on to the original 2005 plan. So who was the livestock producer who did, an ODFW employee?

If you want to "provide optimum and aesthetic benefits to the citizens of the state and enhance the production and public enjoyment of wildlife" why don't you move a pair of wolves to Forest Park in Portland? That would be the best starting place to "encourage the human tolerance for wolves", and as for "ensuring the distribution across the state", move a few to Salem and Eugene too, and don't catch them and move them to my back yard or adjoining farms like you do the cougars and bears every time someone sees one near a populated area. Those liberal conservationists who want the wolf encounter are the ones who voted to stop hunting cougar and bears in Oregon with dogs, and where do you think this wolf plan is going?

The ranchers never signed on to the plan so why do they have to be the guinea pigs and bare the brunt of the problem?

Speaking of pigs, if the spineless hogs at the trough had any concern other than ladder climbing to ensure a fat PERS check, they would take the bull by the horns and live trap all the wolves and truck them back to USFWS headquarters and release them there to see how they handle them on their own turf. 300 years ago their area was wolf habitat too, so if they want them they should have them.

Problem Solved....Budget Balanced.

Do wolves eat pork? Maybe you should train them to eat ferral hogs while you're training them to stay away from the cattle. If you would have put the wolves in the zoo for the conservationist to have their encounters like I suggested when you had the original plan meetings, you wouldn't have this problem. It doesn't appear you have made any effort to provide "optimum and esthetic benefits to ALL the citizens of the state". You hypocrits aren't sticking to your plan.
Christopher P Schubothe

From: Bob Jones [stagger739@gmail.com]
Sent: Thursday, June 24, 2010 9:00 PM
To: ODFW.comments@state.or.us
Cc: cdwarnok@eoni.com
Subject: Wolf comments

My name is June Jones and I'm a member of the Wallowa Co. Sheriff's Search & Rescue K-9 unit. I am speaking for myself and my concern about my search dog, Jesse. In all the articles I have read it appears evident that wolves will come after dogs if they get any opportunity to do so. Jesse is a certified Air Scent dog and right now is the only one in Eastern Oregon as far as I know. We have another dog ready to certify and has all the capabilities of being great. Our dogs, when air scenting are not on a lead and they will range as much as a quarter of a mile or more away from us when searching for human scent when someone is lost. As it stands now, if I get a call for a lost person, child, whatever in a known wolf habitat area, I will not take my dog to try and find and hopefully save a life. It would be sending him to the slaughter and he is too valuable and too important to me and this part of the state to take that risk. I think that is a tragedy, for the lost person and their family, and could very well lead to loss of life. I don't mean to be dramatic, but I think this is a fact that needs to be considered when decisions like bringing the wolves back are made.

Wolves do primarily feed on the young fawns and elk calves this time of year. That is why they are not at present eating our livestock calves. It is a picture that I cannot get out of mind of all these babies in the wilderness being killed, maimed, eaten half alive and left, and for what, because some city folks who probably have never been in the wilderness, never seen a wolf or never been confronted by the cruelties of their breed, think they should be here. The wolves have decimated the elk and deer herds in Montana, you don't see any young fawns with their mothers, you don't even see many deer or elk at all anymore. Where is the concern for preserving the life of the animals that are being killed? Aren't they important to the ecosystem and the sportsman who hunt them for meat to feed their families in these remote areas.

I don't mean to get on a soapbox, and I have no problem with the wolves coming back in manageable numbers, but ranchers and hunters and hikers who have a right to enjoy the wilderness, should also have the right to protect themselves, their livestock and their pets. When the article in the Observer last week said to "make yourself big, throw rocks, shout, etc" it was laughable! We don't have the right to protect our own life using lethal methods if necessary? I don't believe there are many humans that can fight off a wolf with their bare hands, I certainly know I can't.

I don't have the answers, but I believe the bottom line is we need the law on our side to protect ourselves and the ranchers to protect their livestock and their livelihood. Thank you for reading this and I hope some right decisions can be made so we can live in harmony with the wolves, in manageable numbers and the right to protect ourselves and our property. June Jones. WCSSAR-K-9Unit
To whom it may concern,
This letter is my input on the Oregon Wolf Plan. As your group moves through the revision process, please consider the following:

• Allow lethal removal of problem wolves sooner in the process. Issue ranchers “kill” permits sooner and at the first sign of wolf harassment on their private land and grazing leases. RAG boxes and hazing were proven to be ineffective nonlethal deterrents; we used both this past spring and still suffered losses, as did our neighbors. Fladry fencing is not a viable option for livestock businesses in eastern Oregon as the amount needed to begin to “fence” wolves out is so large, the cost of such a measure would be astronomical – the private property at our home place alone would require about 4 miles of such fence – using 2004 estimates, this would cost an additional $4,000-$5,000. To use this on our grazing leases would multiply that number by a hundred. Additionally, research hasn’t necessarily proven fadry to be an effective deterrent.

• Aggressively work to remove wolves at first sign of harassment/depredation.

• Provide a legitimate compensation program for livestock producers. Defenders of Wildlife should not be compensating ranchers for a program mandated by the state of Oregon. Furthermore, there is no current means for compensating ranchers for losses that do not result in the death of an animal. Presently, wolves can maim an animal in such a way that the animal survives, but represents a total economic loss to the producer with no means for recouping this loss.

• Use sound data to make decisions regarding this plan. Much information is coming out now that can assist in revising the plan. Consider recent data that indicates a much larger population in Idaho than originally thought. Pay attention to game counts in wolf areas. Consider alternative theories to habitat restoration in Yellowstone, such as the actual reduction in numbers of grazing animals rather than wolves keeping animals from spending too much time in riparian areas. Use data from Casey Anderson’s study showing more precise estimates of economic losses due to wolf depredation.

• Consider long-term affordability of the plan. Oregon budgeted $212,000 to implement the wolf plan. Craig Ely, ODFW, recently admitted that this was not enough money for the program. Add to this the fact that all state agencies are required to make 9% budget cuts for 2010-2011; reduce the figure to $192,920 for 2010-2011. Sharon Beck, Oregon rancher, recently reported that actual costs of implementing the plan run between $400,000 & $500,000. You cannot afford to implement the plan as written.

• If the plan is written to appease the political will of the people, consider asking the same people to provide for its full funding requirement.

• Consider the economic consequences of revenue losses to the cattle industry. The current economic picture is already bleak.

• Consider supporting legislation that prohibits
frivolous lawsuits against ranchers and management agencies. Keep science and economics in focus as you move through this process. It is all too easy to romanticize wolves and vilify livestock producers.

Karen Patton
Joseph Oregon
Wolf Plan Committee:

Having just read the Oregon Wolf Plan of 2005, I find it comprehensive and am impressed with the breadth and depth of the study/plan. The committee has several competing values to balance, as I find important in my own position of conservationist and livestock owner in Western Oregon.

I have just a few comments. I would like the implementation of the amendment of the damage statute to allow livestock owners without a permit to shoot a wolf caught in the act of killing livestock on their land or grazing allotments on public lands. It is neither realistic nor fair to livestock owners who patrol with a weapon to withhold their right to protect their livestock. I understand the agencies' fear of wanton slaughter of wolves, who require protection under the ESA, yet if the killed wolf is left where shot along with any other evidence and reported to the authorities, that provides some control over a taking of a protected species.

Compensation for livestock losses due to wolf predation would go a long way toward ameliorating some of the negativity and/or hostility that affected livestock owners might feel. No compensation could cover the complete impact of the presence of wolves in a grazing area, such as disturbing cattle off sections of the pasture or the reproductive future of a heifer calf, but it would produce more acceptance of the wolf as having a right to exist again in its historical range.

Anne Guerin
Langlois, OR
I am a stakeholder in the Wolf Plan process and would like to make my views known. My husband, two daughters and I live east of Joseph, Oregon in Wallowa County. We raise cattle, horses, sheep and hay. On May 29th we had the unpleasant experience of finding one of our heifer calves had been killed by a Canadian Grey Wolf. This was confirmed by our local ODFW, County Sheriff, and Federal Government Trapper. Our calf was taken down in an open field just 290 yards from our home. Even if we had been present at the time of the killing we would have been unable, under threat of lawsuits, fines and jail time, to protect our property (the calf) on our own personal private property. This is WRONG. Yes, we were issued a "caught in the act kill permit" after the fact. This is a worthless piece of appeasement handed out by the ODFW, who admits its worthlessness. No one from the ODFW had ever contacted us about the wolf activity in our area even though they had tracking maps of the Alpha male showing he had been spending a lot of time in our neighborhood and on our property prior to our loss. Warnings to area ranchers on wolf activity has not been done.

Canadian Grey Wolves do not belong in Oregon. Period. They cannot be "managed" by people who work in cahoots with the myriad groups who fund the introduction of Canadian Grey Wolves into their disneyland idea of nature. I would like to see the Environmental Impact Study data on such an introduction of a non-native, predatory species. This whole "experiment" is illegal and should be treated as any other illegal activity would be. SHUT IT DOWN.

We, as citizens of the United States, have every right to protect ourselves and our property from harm. It is very upsetting to me that we have been put in the position of having to protect ourselves from groups made up of people who's sole intent is to put farmers and ranchers out of business, using the Canadian Grey Wolf as their nail and the ODFW as their hammer. Remove the Canadian Grey Wolf from Oregon. Stop the mega-waste of time and money by government on a program that is illegal from the start. Listen, for once, to the people who have to live with the full impact of your decisions. Feel our frustration when our loss, which is emotional and very real in dollars and cents, is trivialized by a government employee who gets his tax-paid pay check no matter how many wolves are set loose on private property to prey on domestic livestock. This may not fit into the category of a "Wolf Plan" because my plan is simple:

1. Remove all Canadian Grey Wolves from Oregon.
2. Return any Canadian Grey Wolf that "migrates" into
Oregon.

3. Do not allow the release of Canadian Grey Wolves in Oregon by any entity.

This thinking may seem naive on my part, but consensus building and compromise have proven to be the favorite tool of those who want to shut our country down. They never give an inch and it's time we recognized that.

Kerry Tienhaara
Please use all the important data/ facts when considering the change to the wolf plan this year.

fact #1 This species was a non essential, experimental project that introduced a non native invasive species to our region.

fact #2 This wolf carries over 20 diseases and parasites contagious to humans. Over 60% of this species are carrier's of hydatid cyst disease, which is deadly to all native Oregon wildlife ungulates.

fact #3 There are documentations proving this introduction has been illegal. We here in Oregon do not want to play into the lies and illegal activities of USFWS.

fact #4 Idaho fish and game department will soon be required to "clean up" after these invasive predators "deposits" on private lands. Do you also consider that if allowed to continue to spread into Oregon, You too may have to do "poop" patrols to clean up after them? Can Your Department handle the clean up forced upon you by concerned residents with contaminated land?

Kevin Watson
Christopher P Schubothe

From: Double Arrow Vet Clinic [doublearrowvet@gmail.com]
Sent: Wednesday, June 30, 2010 6:08 PM
To: ODFW.comments@state.or.us
Subject: Oregon Wolf Conservation Plan

I would like to be counted as a person in favor of the oregon cattleman's request to the changes to the oregon wolf management plan submitted by Rod Childer. I would also like to ad that as a cattleman I feel that I should be able to protect my private property which according to our constution we can do that. If a wolf is attacking one of my calves, cows,horses,sheep or one of my dogs I should be able to protect that animal whether it be to scare away with non-lethal methods or to shoot and kill. The wolf is like any other predator like a bear or cougar that is attacking you should be able to kill to protect your property. I do not feel that any cattleman is going to go out of there way to kill any wolves unless one is killing there livestock or is close to there home property. I also do not want our elk and deer populations to be hurt with the wolves being in our area. I feel that is up to odfw to protect them as well.Odfw would also lose money from hunting fees if the elk and deer numbers fall, and the hunters may not want to hunt in a area that has wolves for there own protection. We have cattle in the salt creek area right now and if we would lose 5 - 10 calves we would this fall need to sell those cows because we would not be able to pay our bills, and we would show a loss on our taxes this next year. I really do not mind having the wolves in my area, like a coyote we should be able to kill any that are close or attacking our property. Thanks for reading my thoughts about the wolves. and please change the plan to agree with the Oregon Cattlemans ideas. Larissa Barnhart 65578 Rancho Road, Enterprise, Oregon 97828.
The time has come for the Oregon Department of Fish and Wildlife to step up to the plate and accept responsibility for damage inflicted on the ranching community of Oregon by wolves. They need to stop the lies and tell the public the truth.

I read in a newspaper article last week that there is only one breeding pair in Oregon per the ODFW. Really? Don’t continue to insult our intelligence and quit hiding behind the lies. That might work for those who have never set foot off the pavement in Western Oregon, but we know better over here on the East side. There have been wolf sightings in my area of North Central Oregon for over 10 years, yet the ODFW would have us believe that there are no wolves in the area and they first entered the state within the last 2-3 years. There has been the sighting of a pack of 3 with one wearing a radio collar near where we run cattle in Wheeler County, so the ODFW is very aware of where the wolves are, they are just refusing to admit it and deliberately misleading the public. Before the ODFW would admit that there were wolves even in Oregon, I heard one howl while I was out doing chores one early winter evening.

It is ludicrous that those in the livestock industry cannot protect their livestock even if a wolf is caught in the act of killing or harassing their livestock. The way society has evolved and lost touch with reality, it is going to take a wolf attacking a human, or one of those hikers who thinks the wolves are needed to they can hear them howl while they are on a hike will have their dog ripped to shreds in front of their eyes, and then maybe they will comprehend what the Oregon livestock community is dealing with.

Again ODFW, quit lying and step up to the plate.

Lynn Wilkins
PO Box 22
Condon, OR 97823
To whom it may concern:

Please accept these comments into the official record for the Oregon Wolf Plan. I am an outdoorsman, avid bowhunter, and goatpacker, born and raised in Oregon. I spend several weeks every year living in the Oregon back country.

My request to ODFW is to please change the Oregon Wolf Plan (OWP) such that aggressive wolves can be legally killed without a permit. As the OWP is written today, it is illegal for me to defend my string of packgoats or my bird hunting dog, even while under attack by wolves. This isn't reasonable or ethical. As livestock and pet owners, we have a moral obligation to protect our animals from harm. This isn't just a matter of dollars and lost property. My dog is an integral part of our family. My goats were bottle babies and are bonded to humans. To stand by and watch them get hamstrung and eaten alive by wolves is unthinkable. The life of an aggressive wolf is not more important than the life of my dog or goats. I should have the legal right to defend my pack string and pets from wolves just the same as if they were attacked by a cougar, coyote, or bear.

Do the right thing and close this gap in the Oregon Wolf Plan. Bring common sense back into the plan and make it legal for law abiding citizens to defend our pets and livestock when threatened and/or attacked. It's the right thing to do. Please make the change now.

--MATT

Matt Alford
39360 SW Laurelwood Rd
Gaston, OR 97119
mattalford@hotmail.com
503-780-2596
I would like to offer my input on the Oregon Wolf Plan:

My name is Matt and I am an avid outdoorsman. I own a farm in Clackamas County where I lived for over twenty years. I fish and hunt all over the state and have my whole life. Here is what I know:

- Oregon’s wolves are not protected by the Endangered Species Act. This is in the courts now, kind of flip-flopping.
- Oregon has adopted a plan to insure a minimum of four (4) breeding pair of wolves. This does not mean 8 wolves. Wolf packs are typically greater than ten (10). Many wolves are not monitored or tracked. I have heard reports of wolf sightings and howling all across Eastern Oregon into the Cascades.
- Oregon has hired a wolf coordinator to monitor wolves in Oregon. Based in LaGrande, he is to monitor packs in Hells Canyon, the Cascade’s, Ochoco’s, Steen’s, and, this seems like a BIG job.
- The Oregon Wolf Coordinator uses ODFW offices and bureaucracy. Office space, office equipment and vehicles are very costly.
- Un-told man hours by ranchers, police, sheriff and ODFW personal have been spent. (i.e. “representatives from the ODFW northeast regional office, including Bruce Eddy, Sheriff Steen and Coggins, examined the carcass for nearly two hours, confirming that a calf had been killed by a wolf.”) This example is just one of many and there are more to come.
- ODFW coordination of meetings (include meeting and rancher time). There have been many meetings regarding wolf re-introduction. This must have a price tag.
- Required paperwork for depredation and ranch reimbursement.
- Tracking systems. Finding animals and installing radio collars only to find they are unreliable. This must cost BIG again.
- The government had to recently hire hunters to kill several wolves (2009 and 2010). The hunt has been extended and will last months. This is time consuming and costly.
- Much More...
- Each of these items is going to become more and more expensive in the future.

What do we get from reintroducing wolves:

- Wolves are a native species in North America
- When wolves move into an area, deer and elk become more wary and are less likely to overgraze willows and trees along streams, helping to preserve fish habitat.
- ODFW uses non-lethal actions that are “preventative”. These methods are not working.
- Approximately 30 head of livestock have been confirmed killed by the wolves in the last 12 months. Most livestock kills are reported as “unconfirmed wolf kill” due to time of travel and availability of ODFW biologist’s.
- In 2009, authorized removal of two wolves in Baker County after five separate livestock depredation that killed a total of 27 sheep [all lambs], 1 goat, and 1 calf on 2 private ranches.
- Ranchers are also reporting changes in behavior by cattle consistent with harassment by wolves.
- Game populations will be effected (decreased) like in Idaho and Montana
- More...
Unknows:

- We are not sure whether we actually have wolves occupying the Cascades. There are many unknowns and all wolves cannot be monitored.
- Oregon’s budget for game management will need to increase.
- Oregon will have fewer game animals and thus fewer hunting tags will be awarded. This will have an impact on moneys paid to the state by hunters.
- Many, many more...

Summary: With all of these facts, wolves sound like a very bad idea. Very little good can be attributed to wolves. There are too many negatives and far too many unknowns to consider. Adding another expensive project, to the Oregon budget, that may require unlimited resources, is unwise, and is irresponsible. The Oregon budget is in bad shape already, and for this we do not need to worry about another project that is a useless expense.

Sincerely,

Matthew Jessen
Thank you for taking comments regarding the wolf issue in Eastern Oregon. Beginning in 2000 I worked four
summers in Yellowstone National Park. This was five years after the (re)introduction of Canadian grey wolves into
Yellowstone. My first two years I worked at Mammoth and I would often go out to Lamar Valley to watch the
wolves at their rendezvous site across the Lamar River. What a thrill to watch these magnificent animals.
HOWEVER even in those days I felt the jury was out regarding the wisdom of bringing these animals to the
western U.S. Now, as to the current problem. As the wolves of Yellowstone have become habituated to humans
because they have nothing to fear, so too are the wolves migrating into Eastern Oregon learning they have
nothing to fear, and cattle are certainly easier to kill than elk with their sharp hooves.
In my opinion, after ten years of being somewhat familiar with wolves and their living habits, the only way to
protect the very legitimate business of raising food for this country, which is after all what ranchers are trying to
do, is to allow them to shoot wolves “harassing their livestock, whether cattle, sheep, hogs or chickens. If allowed
free rein wolves can wreck depredation on our ranching communities. If ranchers can shoot, wolves being the
intelligent beings they are, will soon learn a better place for dinner will be in the wilderness. Also, it may negate
the need for "wolf hunts" as are being held in Idaho and Montana.
I consider myself an environmentalist but groups of uninformed, uninvolved city dwellers who think they know
what is best for the people raising their food are sorely mistaken. Saying "Livestock growers in north-east Oregon
are responsible for attracting wolves to the area" shows ignorance beyond belief. And, what the heck is "fladry
fencing" and how does that work on summer range?
*Harassing means just that and not "in the act of attacking".

Ruth Wineteer (not a rancher)
PO Box 486, Enterprise, OR 97828
541-426-4542
Dear Sirs,
My two cents worth on the subject is that the hunters of this state that help support the wildlife with their ever increasing tag and license fee’s. Have a hard enough time dealing with the decrease in available hunting tags and with declining deer, elk, and antelope herd number’s that we DO NOT NEED ANOTHER PREDATOR IN THIS STATE. The cougar and bear numbers have gone out of control since they banned the use of dogs. Adding the wolf is just going to compound the problem even further. Thanks, Terry Huuki
To whom it may concern,

I am sending this short e-mail to let you know what I think of the wolves in N.E. Oregon or more to the point Imnaha buck unit. I have hunted in the same area for over forty-five years and believe I have seen both the good and bad years in the Clear lake ridge area. I camp in the bottom of bear gulch and hunt both sides of this canyon and have been up and down most every draw in this area over the last forty-five years. This last year during deer season there were very few bucks around but we saw lots of both bear and cougar sign and heard of some wolves. During second season Elk we did manage to see a few Elk but I also saw three adult wolves at a great distance and moved to a different location and saw them again but they did not come to close. I heard the pups calling and I believe I could point out to you were the den is. The den which you are keeping secret from everyone. I believe that until you can change the way we hunt for bear and cougar there is know need to have wolves around. By the way this place where I think the den is is also where most of the Elk in this area have their calves, and winter (gee I wonder why). If the wolves are eating cattle it must be because they are running out of Deer and Elk as we see less and less every year.

Thank you,
Thomas L. Stumpf
503-754-4996
P.O. Box 165
Netars, Or. 97143

Thomas Stumpf
tomstu@earthlink.net
EarthLink Revolves Around You.
To Whom it may concern,

I am wondering why it is important that we need to pay so much money for our hunting tags, applications, licenses and it is to help the big game populations, yet less and less people get their tags every year. We know that the money for fish and wildlife is abusing the state funds for the hunters and using it to help the wolves. The wolves that got introduced to Oregon are not native to Oregon, they are native to Canada and that is a violation of your own rules of implementing non native species to different territories. It is a sneaky way to get a wild west again and lock everything up to the public for future generations. If anybody in our government had any common sense they would know that the land has to be managed properly and not influenced by lobbyists and politicians. The Forest Service and our Fish and Wildlife need to rely that we need to manage the public lands to promote longevity of future generations, and managed by common sense not theories and stupid ideas of environmentalists. The wolves are a virus that our government is using to get people out of our land so YOU IDEOLOGIST are using to promote your agendas of raping the people that live in the rural areas to protect the city.

The wolves are a threat to our children, wildlife, water, food and our livelihood. Wolves carry bacteria that nothing is immune to and not only the hunger of the wolves are going to decrease our achievements, but the diseases that they have will also. The wolves have already been killing farmers and ranchers livestock, yet they cant protect their lives and their families lives from them because the wolves are protected by the endangered species act (which I do not understand how they can be on that). It is not fair to the people of eastern Oregon and Oregon itself that Salem and Portland control the rest of the state and the people in the rest of the state does not matter. We will not put up with this anymore and use some common sense to make the correct choice. Remember, you work for US! Think of the rest of Oregon and not just the spoiled rotten Willamette Valley. I wonder what would people think if the wolves got introduced to Portland, because there never used to be people here, and see what the people would say then.

Thank you for reading my input and your welcome for sharing some common sense,

Tyler Long
June 18, 2010

Department of Fish and Wildlife
3604 Cherry Avenue, NE
Salem, OR 97303

Subject: Comments on the Oregon Wolf Conservation and Management Plan update.

To Whom It May Concern:

The Wallowa County Chamber of Commerce (Chamber) Board of Directors presents this letter to be included as a public record to the Oregon Wolf Plan update. Our Chamber was established in 1978 and represents a membership of 365 local businesses, organizations and citizens of Wallowa County. The mission of our organization is to support and promote our business community. This letter is submitted on behalf of our entire membership.

Many of our members are either involved as livestock producers, work in businesses that provide services to, or are dependent upon the livestock industry. The agricultural sector in Wallowa County represents one-third of our economic base. Local businesses and service providers are highly dependent on ranchers and other agricultural producers to sustain their business operations.

The Chamber recognizes existing deficiencies in the current Oregon Wolf Plan (Plan) and its implementation. The Chamber supports the efforts being made by the Oregon Cattlemen’s Association, the Wallowa County Stockgrower’s and others who are leading efforts to update the Plan this coming year. These efforts emphasize that the Plan, as written, must be updated. This effort also recognizes wolves will have a presence in Oregon and that the Plan will require a delicate balance between wolf conservation and expanded latitude in responding to wolf problems.

It is important to the Wallowa County business community that wolf conservation and management does not become a detriment to the economic viability of our county. Participation in outdoor activities such as hiking, camping, hunting, fishing, bird watching, and various other recreational activities enjoyed in Wallowa County must not be threatened by the mismanagement of wolves.

The Chamber further encourages changes that allow for an expedited response to livestock depredation and the ability to protect private property. This includes home, family, your livestock and pets. Additionally the Chamber encourages a more open and accurate dialogue between the State of Oregon and its citizens that are affected by the Oregon Wolf Plan.

Please contact Pat Wortman at our Chamber office for further comment.

Sincerely,

Doris Woempner,
Chamber President

It’s a Way of Living
July 6, 2010

Department of Fish and Wildlife
3604 Cherry Ave NE
Salem, OR 97303

To whom it may concern:

The Baker County Chamber of Commerce Board of Directors presents this letter to be included as a public record to the Oregon Wolf update. Our chamber represents a membership of 430 local businesses, organizations, and citizens of Baker County Oregon. Baker County Chamber of Commerce is dedicated to the promotion and support of North East Oregon Businesses through membership participation and leadership that fosters local economic growth and community involvement while embracing our heritage and providing for our future. This letter is being submitted on behalf of our entire membership.

Ranching, farming, and support businesses in Baker County represent almost half of our economic base in the county. Local businesses and service providers are highly dependent on ranchers and other agricultural producers to sustain their business operations.

The Chamber recognizes existing deficiencies in the current Oregon Wolf Plan and its implementation. The Chamber supports the efforts being made by the Oregon Cattlemen’s Association, and others who are leading efforts to update the Plan this coming year. These efforts emphasize that the Plan as written, must be updated. This effort also recognizes wolves will have a presence in Oregon and that the Plan will require a delicate balance between wolf conservation and expanded latitude in responding to wolf problems.

It is important to the Baker County Business community that wolf conservation and management does not become a detriment to the economic viability of our county. Participation in outdoor activities such as hiking, camping, hunting, fishing, bird watching, and various other recreational activities enjoyed in Baker County must not be threatened by the mismanagement of wolves.

The Chamber further encourages changes that allow for an expedited response to livestock depredation and the ability to protect private property. This includes home, family, your livestock and pets additionally the Chamber encourages a more open and accurate dialogue between the State of Oregon and its citizens that are affected by the Oregon Wolf Plan.

Please feel free to contact me for any further comment, on behalf of the Baker County Chamber of Commerce Board of Directors; Michael Howe-President, Scott Knox-Vice President, Jeremy Gilpin-Director, Richard Langrell-Director, Terry McQuisten-Treasurer.

Thank you,

Debi Bainter Executive Director

RECEIVED
JUL 15 2010

WILDLIFE DIVISION
Christina A Schmidt

From: ODFW Commission  
Sent: Monday, July 19, 2010 10:17 AM  
To: Craig Ely; Ronald Anglin; Curt Melcher  
Cc: Michelle Tate  
Subject: FW: wolves

Another Wolf email copied to legislators – Teri Kucera

From: Gayle Makin [mailto:sagerider@verizon.net]  
Sent: Monday, July 19, 2010 1:04 AM  
To: 'Michelle Dennehy'; odfw.commission@state.or.us  
Cc: SEN Kruse; ‘Senator Larry George’; REP Wingard; rep.davehunt@state.or.us; rep.brucenando@state.or.us; sen.petercourtney@state.or.us; sen.rickmetsger@state.or.us; sen.tedferrioli@state.or.us; ‘State Senator Suzanne Bonamici’  
Subject: RE: wolves

- Lewis and Clark noted that seven elk killed by expedition hunters were “…untouched by the wolves, of which indeed there are but a few in this country…”

**The Lewis and Clark Expedition**

Traveling mainly by river, Lewis and Clark began their journey up the Missouri in 1804, reached its navigable limits above Great Falls and then crossed the Rocky and Bitterroot Mountains to the Clearwater River, which led them to the Snake River and on to the Columbia, down which they passed to the Pacific Ocean in 1805.

I have had some time to review your alleged log of wolves in Oregon and I find most of your research very troubling. You site excerpts from Lewis & Clark. I have provided a brief summary of the path Lewis & Clark took. You do not cite where in their travels that the elk were untouched by wolves. However, Lewis and Clark obviously were never in Wallowa County, Oregon and in fact most likely encountered the wolves if any in Idaho. Further, you cite Ft. Walla Walla as a location of wolves in the history in Oregon. I believe that Walla Walla is North of the Oregon border. In your citation of the Oregon wolf plan, it refers to the Oregon Territories. If my history is still clear in the mind of an old man, I believe that the Oregon Territories included Washington and Idaho. You seem to be grasping at straws in order to shine me on and make me think that there were actually wolves in Oregon. Nice try though. I am sure you have my mailing address after the fifty some odd years that I have purchased hunting and fishing license in Oregon. Just in case you are unable to find it, it is: Gayle Makin 25563 SW Baker Rd., Sherwood, OR 97140. I am anxiously waiting for your citation of the actual proof that wolves and not coyote or some smaller dog like animal were in fact in OREGON, THE STATE THE ODFW IS RESPONSIBLE FOR. Please do not try to shine me on any further and provide some hard evidence to support your claims. You can mail me copies now that you have the address. I have provided Lars Larson with a copy of this text.

From: Michelle Dennehy [mailto:michelle.n.dennehy@state.or.us]  
Sent: Thursday, July 15, 2010 12:43 PM  
To: Michelle Dennehy; Gayle Makin  
Cc: REP Wingard  
Subject: RE: wolves

ODFW responses in red text.

I do not believe that the ‘GRAY WOLF’ ever existed in Oregon. I would request some reference material that identifies this species as the wolves that were if ever naturally in Oregon.

From our Wolf Management Plan, beginning on page 4. I am also aware of a diary reference from Henry Spalding in the mid 1830’s that talks about meeting with Old Chief Joseph (In Wallowa County) and how the Indians roasted a wolf for dinner.

7/21/2010
History of Wolves in Oregon

Early History

Evidence that wolves existed in Oregon can be documented through various means including archeological records, Native American accounts, journals and diaries of early explorers and pioneers, museum specimens, wolf bounty records, and various books and reports. The following written accounts offer some interesting observations:

• “...(wolves) are exceedingly numerous in Oregon and Washington Territories, from the Cascades to the Rocky Mountain Divide....”
  - George Suckley, expedition Naturalist, 1853-55.
• “...the wolves are very numerous in this country and exceedingly troublesome.”
  - Mr. Drayton, Wilkes Expedition, vicinity of Fort Walla Walla, 1841.
• Lewis and Clark noted that seven elk killed by expedition hunters were “…untouched by the wolves, of which indeed there are but a few in this country....”
  - Lewis and Clark, winter of 1805-06, Fort Clatsop area, near the mouth of the Columbia River.

Additional wolf location information was reported by biologist Vernon Bailey (1936):

• “…in 1834 Wyeth reported several (wolves) killed along the Deschutes River.”
• “…in 1835 Townsend secured the type of this subspecies near Fort Vancouver just north of the Columbia River.”
• “…in 1854 Suckley collected (wolf) specimens near The Dalles.”
• “…in 1897 Captain Applegate reported them (wolves) formerly common, but at that time extremely rare in the southern Cascade region.”
• “…Jewett reports one large male wolf taken...August 20, 1930, near Balm Mountain on the Umpqua National Forest.”
• “…another old male wolf taken (1930)…on the shore of Crescent Lake in Klamath County.”
• “…two other wolves were killed in Douglas County and one in Lane County during 1930, and one near McKenzie Bridge in Lane County in 1931.”

Excerpted from Young and Goldman (1944) and Young (1946).

December 1, 2005

Ironically, wolves played a pivotal role in the formation of the early Oregon territorial government. Young and Goldman (1944) wrote “…efforts to destroy the wolf in this country were instrumental in formation of the Oregon Territory. The “wolf meetings” of Oregon, officially the formal sessions of the Oregon Wolf Organization, drew pioneer leaders of the northwest together as did no other objective.” With wolves and wolf eradication as the drawing card, meeting organizers were successful in assembling significant numbers of settlers to discuss formation of a civil government in the region.

I do not believe the Gray Wolf is an endangered species as there are thousands of them in Canada and Alaska. The Oregon wolf management plan should be to eradicate this predator before they get a good foothold in Oregon.

The federal government (U.S. Fish and Wildlife Service) disagrees and reintroduced them into the Rocky Mtn states. A state plan to eradicate the wolf before they got a foothold would have been against the law.

You plan to kill two wolves from a pack of fourteen is preposterous. Further, you wolf kill permits issued to the local ranchers are a “feel good” joke. How many of the ranchers have rifles mounted with night vision scopes and how many are sleeping in the day and spending all night in the pasture with their cattle when you wolves are killing the cattle?

ODFW recognizes that the “caught in the act” permits provided to ranchers are not easy to use but they are one of the tools we have and we wanted them available to ranchers. ODFW also authorized Wildlife Services to use lethal control without needing to catch wolves “in the act” of attacking livestock.

I am hearing from friends in Wallowa County that the large elk herds in the Big Sheep and Little Sheep areas are virtually calfless this year. ODFW does not have counts for this year’s calves yet. Certainly wolves could kill elk calves but one pack should not have a huge impact on a 1500-member elk herd. Other people in the Little Sheep area have told ODFW that they see calves.
But ODFW is also concerned about the potential for wolves to impact big game and will manage wolves in keeping with our other wildlife goals, so big game populations and hunting opportunities are also sustained.

Furthermore, it is thought by many people (including people that have seen them in the back of pickups) that the wolves are being brought into the County and turned loose by native Americans.

ODFW has no evidence that this has occurred. Have the individuals who saw what they did reported it to ODFW or Oregon State Police with information about what they witnessed? We do have evidence of wolves naturally coming into Oregon, including B-300 the alpha female of the pack, and of B-300 breeding and producing pups.

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From: Gayle Makin [mailto:sagerider@verizon.net]
Sent: Wednesday, July 14, 2010 1:45 PM
To: 'Michelle Dennehy'
Cc: REP Wingard
Subject: RE: wolves

I do not believe that the ‘GRAY WOLF’ ever existed in Oregon. I would request some reference material that identifies this species as the wolves that were ever naturally in Oregon. I do not believe the Gray Wolf is an endangered species as there are thousands of them in Canada and Alaska. The Oregon wolf management plan should be to eradicate this predator before they get a good foothold in Oregon. You plan to kill two wolves from a pack of fourteen is preposterous. Further, you wolf kill permits issued to the local ranchers are a “feel good” joke. How many of the ranchers have rifles mounted with night vision scopes and how many are sleeping in the day and spending all night in the pasture with their cattle when you wolves are killing the cattle? I am hearing from friends in Wallowa County that the large elk herds in the Big Sheep and Little Sheep areas are virtually calfless this year. Congratulations on your efforts to eliminate the species that you are responsible for the management of. Furthermore, it is thought by many people (including people that have seen them in the back of pickups) that the wolves are being brought into the County and turned loose by native Americans. If this is true, it certainly distracts from your allegations that it is a natural migration. I will look forward to your citations of actual documents that refer to the GRAY WOLF’S prior existence in Oregon. From the internet research I have conducted, I do not believe that such reference material exists and that your Oregon Wolf Management plan is a farce. It is beyond me as to why the Oregon government make every effort to end the ability of its voters and residents to earn a living. By the way, I did not buy any hunting permits and applications this year. I simply do not want to compete with your preferred predator.

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From: Michelle Dennehy [mailto:michelle.n.dennehy@state.or.us]
Sent: Wednesday, July 14, 2010 1:24 PM
To: sagerider@verizon.net
Subject: wolves

Dear Ms. Makin:

This is in response to your email sent to ODFW Comments.

Evidence that wolves existed in Oregon before European-American settlement can be found in the journals and diaries of early explorers and pioneers, wolf bounty records, museum specimens, and other sources. For example, George Suckley, a naturalist, wrote during an expedition in Oregon from 1853-55 that “wolves are exceedingly numerous in Oregon and Washington Territories, from the Cascades to the Rocky Mountain Divide.”

As in other Western states where they existed, wolves were bounty-hunted (with most taken prior to the mid 1930s) and eventually removed from Oregon.

ODFW and the state of Oregon did not reintroduce wolves into the state, meaning no wolves were purposely captured and released here. The U.S. Fish and Wildlife Service (a federal agency) captured...
gray wolves and manually reintroduced them into Yellowstone National Park and Idaho. Now established in Idaho, wolves are naturally crossing over from Idaho into Oregon. Oregon has a Wolf Conservation and Management Plan to manage these wolves that come into the state. Why are we conserving wolves in Oregon today? Because it’s the law. Wolves were listed as endangered by the federal Endangered Species Act (ESA) in 1974. When the Oregon Legislature enacted the state’s own Endangered Species Act in 1987, it grandfathered in all species native to Oregon that were then listed under the federal ESA, including wolves. ODFW is required by law to conserve wolves.

That said, ODFW recognizes the impacts wolves may have on livestock and it’s a problem the department takes very seriously. The department is working closely with livestock producers to try to minimize losses to wolves. ODFW will kill “problem” wolves, or wolves that repeatedly kill livestock. We did so in Baker County last year and have tried to do so in Wallowa County this year.

Please visit the website below for the latest news on wolves, including the Imnaha situation. http://www.dfw.state.or.us/wolves/

Thank you,
Michelle Dennehy

Michelle Dennehy
Wildlife Programs Communications Coordinator
Oregon Department of Fish and Wildlife
3406 Cherry Avenue NE
Salem, OR 97303
http://www.dfw.state.or.us/
tel. 503 947 6022
cell 503 931 2748
e-mail: Michelle.N.Dennehy@state.or.us

From: Gayle Makin [mailto:sagerider@verizon.net]
Sent: Thursday, July 08, 2010 11:59 PM
To: COMENTS ODFW
Cc: Sen Kruse; Sen George L; Rep Wingard; Rep Nolan; Rep Roblan; Sen Courtney; Sen Metsger; Sen Devlin; Sen Ferrioli; Sen Bonamici
Subject: FW: Out of Office AutoReply: Public Comments from the Web

I was born and raised in Joseph, Oregon. I still live in Oregon, although I no longer live in that part of Oregon, I have a fond adoration for Wallowa County and the people that live there. My great grandfather was one of the first settlers in Wallowa County and ran bands of sheep on the Imnaha, right in the heart of the new Oregon wolf packs territory. I asked my ninety year old father the other day if he ever remembered any mention of wolves ever being in Oregon. He flatly said “no”. I have asked ODFW to justify their “REINTRODUCTION WOLF PLAN OF OREGON” and document for me that there were in fact wolves here before they brought these devastating animal to prey on the ranchers. They have ignored my request along with other messages. Perhaps one of the legislatures that receive this message can encourage the ODFW to come clean with the citizens of Oregon regarding their bullshit REINTRODUCTION wolf plan and admit that you cannot reintroduce something that never was.

From: Gayle Makin [mailto:sagerider@verizon.net]
Sent: Tuesday, June 01, 2010 1:23 PM
To: 'ODFW Comments'
Subject: RE: Out of Office AutoReply: Public Comments from the Web

7/21/2010
You call your bullshit wolf program a “reintroduction”. As near as I can determine, including information on the web that flat out states the same, wolves were never in Oregon. If this is the case, how can your bullshit program be a “REINTRODUCTION”. I would like evidence outside of the ODFW to study. It is obvious that you have chosen to lie about the current wolf kills stating that they were not when they have been certified kills. Why would anyone except a government employee want to reintroduce something that devastates the livelihood of good hard working Oregonians whose taxes pay your overbloated salary.

From: ODFW Comments [mailto:odfw.comments@state.or.us]
Sent: Tuesday, June 01, 2010 11:10 AM
To: Gayle Makin
Subject: Out of Office AutoReply: Public Comments from the Web
Thank you for your comments on this issue. Your message will be forwarded to the appropriate staff for review, filing and any necessary response.

-ODFW Information and Education Division
As livestock owners and residents of Wallowa Valley, we fully agree and support the recommended revisions submitted by the Oregon Cattlemen's Association Wolf Committee. We have personally suffered losses due to wolves on our private property in the Wallowa Valley even after repeated attempts to haze them away. The amount of extra time trying to guard and patrol against wolf depredation is quite substantial and costly to us. Chasing off problem wolves just to have them come back and kill your livestock at a later date, is an effort in futility. Hence, we agree with more stringent means in dealing with these wolves.

We have been unsatisfied with the communication and handling of our depredation case by ODFW wolf specialist. In an email dated June 24, 2010, we were told we would be contacted by Defenders of Wildlife regarding any compensation for our loss. We have yet to be contacted.

We have never seen an economic impact statement or environmental impact statement regarding the introduction of wolves from Canada into the United States. We personally do not believe that these are the same wolves that were once indigenous to our area. Some may argue that they are, but at any rate these wolves are much larger than the species that were here prior. They will kill much more prey, be it game animals or livestock than what a smaller wolf would kill. In short, these re-introduced wolves could be an environmental and economic disaster for the state of Oregon. We don't believe we should suffer either of these.

Tom and Lori Schaafsma
61581 Tucker Down Rd
Joseph, OR 97846

541-432-3310
From: TODD PFEIFFER [mailto:tpfeiffer@q.com]
Sent: Tuesday, July 27, 2010 9:49 PM
To: odfw.info@state.or.us
Subject: Wolves in Oregon

Dear ODF&W,

As a lifelong Oregon resident and avid hunter I have become deeply concerned about and extremely disappointed in your management of wolves in Oregon. You are wasting away a ridiculous amount of hunter generated money that was intended to better Oregon’s big game populations on protecting and promoting wolves that are dead set on destroying Oregon’s big game herds. Wolves were eliminated in the West years ago for good reason. They don’t belong here and we don’t want them. Quit wasting money and wildlife in Oregon and get rid of the wolves while you still can and while we still have what little elk and deer herds we do have.

I can remember when I was young and we could go out for a drive on any evening and see 400 to 500 deer in the fields. Today on that same drive you are lucky to see 30 deer. Deer numbers are obviously at a ridiculous low and you seemingly want to bring the numbers even lower. I have heard numerous times about maintaining deer numbers that can be supported by the land but the obvious fact is that you have absolutely no idea what that number is. There is no place in Oregon that the deer have eaten all of their feed because there simply isn’t any deer. Back in the days when I could go out and see 4-5 hundred in an evening they were not starving to death so obviously the land can sustain numbers that high or higher. You have spent tens of thousands of dollars on studies and have clearly learned nothing because you are not able to bring the deer numbers back to what they were.

It’s time you start using some common sense in your management practices. Get rid of the wolves, bring back predator hunting with hounds, temporarily reduce the tag numbers, end the doe and cow hunts, quit letting land owners sell their LOP tags and start bringing the herd numbers back up. I like the sound of giving youth hunters an easy opportunity but the result is that you are helping them destroy their own future hunting opportunities. There were no youth hunts when I was a youth and I still was able to bag a buck every year. That’s because there were some deer then. Back then no one really even talked about wolves, bears and cougars because wolves didn’t exist and bear and cougar populations were kept low. Bring the deer numbers back up and you won’t need youth hunts. Think of this, when the wolves eat all the deer and elk the hunters will quit applying for and purchasing tags. ODF&W’s budget will plummet and there won’t be any funding for you to continue operating. Anti-hunters and environmentalist groups spend all their money trying to stop hunting and don’t spend anything directly helping support wildlife. They won’t help support you either.

Seriously concerned,

Todd Pfeiffer
Klamath Falls, OR
So we are not going to introduce wolves into the State of Oregon, but any wolves that happen to wander into the state will mandate additional expenditures to monitor, legislate, and manage them (while we wrestle with statewide budget deficits). The least expensive management option is to simply shoot these invaders.

We are submitting a new biennium budget for 2011 - 2013. What has it cost Oregon so far to "manage" wolves in Oregon?, and what are we budgeting in the next biennium for this dozen or so squatters in Oregon? How much is it when broken down to cost per animal? Couldn't these dollars be spent much more wisely on existing game species instead of allowing this costly threat to game and livestock to exist-- a threat that antagonizes our efforts to protect livestock and game animals?

We don't need wolves in Oregon. Who are the intellectual idiots that are supporting the presence of wolves in the state? Surely we can't blame this on Obama too. Seriously, who are the agencies and organizations that have such a poor understanding of the history of this species that they are lobbying for their presence where it once was eliminated?

In addition to a few comments, this communication requests answers to a number of questions.... hopefully your reply yields some thoughtful insight.

Jerald R. Jackman
375 SE Knowledge St.
Prineville, OR 97754
7/14/10

To: ODFW

From: Helen Scott
346 Bickford Dr.
Grants Pass, OR 97527

Please accept this email as my comments for the Oregon Wolf Conservation and Management Plan.

The Plan is to consider the economic and social interests of all Oregonians. As a fourth generation Oregonian living in SW Oregon, I have interests in both the economic and social sides of the plan.

I believe the only economic benefit from the Oregon wolves is to the preservationist non-profits, the attorneys who file their suits and the employees of the court systems. Since rising court costs are a liability to the taxpayer, this is a downside to any economic benefit.

The wolf population in Oregon should be managed. The delisted number of wolves required to survive should apply for all of Oregon. There should be an annual quota for Oregon, and until that quota, such as kill down to 6 pairs is met, there should be no restrictions for killing a wolf. Quotas are not new with the cougar as an example. There are enough wolves in Idaho and Montana to remove any danger of the wolf being extinct.

The state needs to protect the economic interests of its remaining businesses, especially in agriculture. My county, Josephine, as of yesterday, had an unemployment rate of 14.5%; the state is at 10.5%. In my county, the true percentage is much higher because many people, in construction, for instance, were never on the rolls to start with. I, and my fellow Oregonians, are better off with reduced food prices. Reduction in prices does not come with Oregon wild animals being allowed to kill livestock. There should be no time lapse between seeing a wolf attack and legally killing a wolf.

The state must recognize the consequences of a livestock kill in a herd. The remaining animals are stressed and become more difficult to manage over the term of their commercial life. When animals get stressed, they are much like humans: they do not thrive. These consequences add to the costs of the producer and impact my economic life, which, when combined with the economic life of others in Oregon, actually adds up.

It is simple. On the economic side, ranchers are hurt economically by wolves and I am hurt economically when Oregon meat becomes more expensive to produce or ranchers go out of business due to restrictive Oregon laws and regulations.

On the social side, as a person who enjoys going out in the woods and fields of Oregon, I am concerned with my safety. This is part of my health and welfare to not be stressed by my surroundings. I want no bureaucracy telling me I cannot kill a wolf if I perceive a danger. On the health side, I appreciate knowing where my meat comes from and purchase Oregon meat products. The consequences of wolf livestock kills increase meat producing costs. This is bad.

Hazards from wolves are expensive. Wolves are costly to Oregonians. Wolves are not tourist attractions. The State of Oregon and the residents of Oregon are experiencing severe reductions in income. The state must recognize this problem and reduce expensive requirements for its citizens.

Thank you for this opportunity to comment.
Thank you for the opportunity to comment on the Wolf Management Plan.

An OHA member and a longtime Oregon hunter, I am opposed to the managed introduction of wolves in our state. The more that the Department is seen to facilitate the introduction of wolves, the less cooperation that we will get from landowners and livestock managers.

I urge the Department to give landowners and livestock managers the tools to protect their property and livelihood from wolves.

Respectfully,

Gary Lewis
Bend, OR
To whom it may concern,

My name is Robert Butterfield and I'm a fifth generation farmer in Wallowa County. My wife Julie and I both graduated from the University of Idaho in 2006. After graduating we started our own business, and we currently sell hay in four western states, three states back east, and we also export hay to Japan.

I'm writing to you to express our concern with the effects the wolves are going to bring to our business as well as our community. Although the majority of our hay is sold outside the county, a large portion is sold to local cattle ranchers. I can honestly tell you that if the wolves put even one or two cattle ranchers out of business, the results will be devastating to local farmers. Without these ranchers I cannot make it farming. Our business currently supports several dozen business around the state, which creates several jobs. If the ranchers go out of business so do we, and if the farmers go it will directly impact the local grocery stores, schools, restaurants, farm co-ops, and dozens of other businesses that I could name. It will result in hundreds of government workers being laid off, because our tax dollars go to support any and all government workers. I often think that people fail to realize the trickle down effect, that farming and ranching dollars have in an economy.

My wife recently was hired as a school teacher, and we both realize as state tax dollars decrease, and if the effects wolves can have on a local economy begin to take shape, that her new job will quickly be eliminated. As farming and ranchers and all the businesses we support are added to the ever growing unemployment lines, our local schools will lose students left and right, adding another round of layoffs.

As new parents of a six month old little boy, I write to you because our communities whole way of life is being turned upside down. I want my son, and future children to have the chance to live in this beautiful place. Please, when deciding on what goes into the new Wolf Plan, please think not only of the effects we as humans have on the wolves, but the effects they have on us. The fate of tens of thousands of jobs, will forever be changed based upon your decisions. Please think of all the people, young and old, that your choices can and will affect.

I thank you for your time, and I hope the process of writing the new plan goes well for you. I'm sure its not an easy task trying to mold everyone's views into it.

Robert, Julie, and Kolton Butterfield
-----Original Message-----
From: Marceline Gearry [mailto:marcelineg@gmail.com]
Sent: Wednesday, March 31, 2010 7:46 PM
To: odfw.comments@state.or.us
Subject: Wolf plan review

I have been working for wolf recovery in Oregon for 11 years. I have attended hearings and have testified, and written letters. I have sat in small group seminar with a OCA representative, listen to the rhetoric, read their very persuasive written material until the last pages. The state plan must not be altered to placate the Farm Bureau and OCA. The people of Oregon want wolves to return to bring our ecosystem back in balance with large predators. Actually, the farm bureau has some interesting info from years back about predators to livestock, ie. DOGS! DO NOT ACCEDE TO THEIR STRATEGY! Sincerely, Marceline Gearry
After viewing the film, Lords of Nature, and hearing from a panel of scientists, I am writing to ask for a fully-funded Oregon wolf plan that allows for a meaningful and sustainable recovery of this important native predator. As the science and understanding of the role of wolves in our ecosystem evolves, we must also evolve as managers and protectors. Thank you for considering my comments.

Benton Elliott
1313 Lincoln Street, #605
Eugene, Oregon 97401
I urge you to continue the wolf recovery program. It has become very clear that wolves, as predators, play a vital role in maintaining a proper balance between elements of the environment: plants, prey animals (deer, elk, etc.), and every other constituent of land and water. Wildlife management techniques can reduce losses to ranchers from wolf depredation. Returning to the "olden days" of "the only good wolf is a dead wolf" would be extremely deleterious to the balance of Nature.

Charleynne Gates
Dear ODFW,

Please restore balance to the ecosystem as you review Oregon’s Wolf Conservation and Management Plan. Wolves should be part of that ecosystem as they used to be. We need a plan for sustainable recovery, meaning expanding numbers far beyond the few wolves we have now. They need strong protection.

Thank you.

Sincerely,

David Sexton
3820 SW KANAN DR
Portland, OR 97221
Dear ODFW,

As you review Oregon’s Wolf Conservation and Management Plan, I urge you to consider implementing stronger protections for Oregon’s wolves.

Oregon was supposed to be different.

In 2005, we developed a wolf plan that prioritized wolf recovery but also included major concessions to the livestock industry and other special interests who were less than thrilled about the return of the native predator. Many conservationists chose to defend the plan in the hope that should conflict occur, cooler heads and science-based management would prevail.

We were wrong.

A vocal, fearful, and misinformed minority of folks have promised to lobby Salem to pass legislation gutting Oregon's already weak wildlife protections.

I am sick of this destructive stance.

Wolves are now an endangered species in Oregon. The objective of the wolf plan ought to be sustainable recovery of this native predator using science-based wildlife management. Management should aim to protect Oregon’s native species and ecosystems, not appease narrow special interests. Wolf recovery numbers are far too low—4 breeding pairs is not enough to ensure a meaningful and sustainable recovery. What’s more, the plan is severely underfunded.

Finally, in implementing the plan, ODFW must emphasize the use of non-lethal tools to reduce and prevent conflicts including effective communication, education, and outreach. Lethal control should only be an option of last resort.

As the agency charged with managing Oregon’s wildlife for the benefit of all, I thank you for accepting my comments. Please redouble your efforts towards restoring balance to Oregon’s ecosystems by giving wolves the strong protections they need.

Very Sincerely,

D Cooke
1049 Hillview Dr
Ashland, OR 97520
In 2006 (before wolves had begun to re-establish themselves in Oregon), 65,000 cows died in the state before they made it to the slaughterhouse. Most died from disease. Over 8,000 died during birth and 1,600 died from weather. Defend the wolf plan!

Wolves and Cougars, like all native species have a right to survive in our state. After killing the last wolf in the 1940’s, they have begun to make a tenuous recovery. After the first few wolves were killed by poachers and hit by cars, we have a confirmed wolf population in the low double digits. Like the vast majority of Oregonians who value our state’s wildlife & wild places, I welcome that news. In 2005 Oregon wisely created a compromise wolf plan that is now undergoing a 5-year review. The plan was drafted so that if problems arose, wildlife managers could deal with them rationally. The decision made last year to kill two of our state’s wolves made it clear that wildlife managers have more than enough tools to deal with problems. Still, the plan remains underfunded and under attack by special interests who want to take the decision to kill this endangered species into their own hands. I urge you to make every effort to fully fund and strengthen the wolf management plan and oppose any effort to weaken it or put management decisions in the hands of private citizens. Wolves in Oregon are still a very endangered species and in need of protection from a vocal minority who would happily see them again exterminated. As someone who values our natural heritage, I am counting on...
ODFW to stand up for wolves and wildlife. It’s time to learn from the mistakes of the past – not repeat them.
Dear ODFW,

I am writing to urge you to stop the killing of wolves near Joseph. Most cattle who die fall to disease not to wolves. And dogs also kill cattle, but no one is advocating to kill dogs, which of course no one should. The problem is that cattle do not belong there, that area is habitat to wildlife including wolves. So there will always be this issue as long as cattle ranchers' interests trump the rights of wolves to live freely in their own habitat. There are few wolves left, but plenty of cattle. The wolves are the ones who are endangered. Please do not give in to the demands of cattle ranchers and kill these wolves. To aid their survival, I urge you to also increase the breeding pair limit from 3 to 12. That area is the wolves' home. And they have a right to continue living.

Sincerely,

Courtney Scott
2106 NE Flanders
Portland, OR 97232
Please do not turn Oregon into a backwards, redneck run state when it comes to wolves, as Montana, Idaho and Wyoming have become. Allowing the ranchers to kill off an entire pack would only open up the floodgates and allow them to exterminate the entire wolf population in the state. It isn't right, and everyone knows it isn't right. Please don't listen to biased media coverage and outright lies. The wolves don't deserve to be slaughtered.

Nikole Earnhart
Don't let Oregon ranchers force the extermination of the Imnaha Pack of wolves. Livestock depredation by wolves on cattle has been exaggerated for the sole purpose of getting rid of these wolves. I can't believe Oregon would do this when the wolf population is so low.
Dear Commissioners:

The constant and escalating hysteria against wolves in NE Oregon has put more than half of Oregon's wolves in danger of being exterminated.

This relentless and dishonest media campaign by the Oregon Cattlemens' Assoc. is aimed at exterminating the Imnaha pack near Joseph. This pack of 10 accounts for more than half of our known wolf population of 14. Ranchers are claiming many calves killed despite only ONE confirmed case of depredation from a population of 36,500 cattle county-wide.

Many NE Oregon ranchers have taken no proactive non-lethal measures to protect their livestock, such as the use of fladry, range riders, or burying their dead animals deep enough so as not to attract wolves. Equipment and help to pay for these measures and others are available from Defenders of Wildlife and the ODFW. Defenders compensates all confirmed losses at market prices.

The OCA was responsible in 2005 and 2007 for blocking passage of the legislation called for in the OR wolf plan that would have, among other things:

1. amended the Ag Damage statute to allow take of wolves by private citizens under certain circumstances
2. established a compensation/proactive non-lethal fund.

The OCA argued then that folks should be allowed to take wolves under extremely broad circumstances and that they would accept nothing less. They succeeded in killing passage of the very legislation that would have helped them.

Allowing the language OCA wants to introduce to the Wolf Plan would not only take management decisions out of the hands of biologists and wildlife managers, but it would make it next to impossible to enforce poaching laws.

In Idaho last year, where wolves are most numerous in the West, less than 1% of cattle losses were attributed to wolves. Livestock operators can adapt to the presence of wolves, as has been shown in the West and in northern Minnesota, where 3,000 wolves co-exist with cattle and sheep operations.

I earnestly urge the ODFW to:

* Keep wolf management in the hands of biologists and wildlife managers. Allowing individuals the license to kill wolves on their own initiative would lead to widespread and indiscriminate slaughter of our wolves, in many cases of wolves not involved in livestock predation.

* Establish a state fund to assist in providing non-lethal deterrents to wolf depredation including both the necessary hardware and subsidies for the employment of range-riders, and to compensate ranchers for confirmed wolf depredations.

* Raise the breeding pair limit from 3 to 12 to ensure the survival of a healthy wolf population in Oregon.

Thank you,

Mike K
Dear Commissioners:

The constant and escalating hysteria against wolves in NE Oregon has put more than half of Oregon’s wolves in danger of being exterminated.

This relentless and dishonest media campaign by the Oregon Cattlemens’ Assoc. is aimed at exterminating the Imnaha pack near Joseph. This pack of 10 accounts for more than half of our known wolf population of 14. Ranchers are claiming many calves killed despite only ONE confirmed case of depredation from a population of 36,500 cattle county-wide.

Many NE Oregon ranchers have taken no proactive non-lethal measures to protect their livestock, such as the use of fladry, range riders, or burying their dead animals deep enough so as not to attract wolves. Equipment and help to pay for these measures and others are available from Defenders of Wildlife and the ODFW. Defenders compensates all confirmed losses at market prices.

The OCA was responsible in 2005 and 2007 for blocking passage of the legislation called for in the OR wolf plan that would have, among other things:

1. amended the Ag Damage statute to allow take of wolves by private citizens under certain circumstances

2. established a compensation/proactive non-lethal fund.

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Thank you,

Wally Sykes
Joseph, OR
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* Raise the breeding pair limit from 4 to 12 to ensure the survival of a healthy wolf population in Oregon.

Thank you,

Izabela Matej
Dear Sir/Madam,

Please accept my comments on the 5-year review of Oregon’s wolf plan. This plan is a shining example of reason compared to the low bar set by states like Idaho and Wyoming, but it also has some very serious shortcomings.

Although I understand the concerns of the livestock industry (like the Oregon Cattlemen’s Association), they are clearly anti-wolf without thinking of the big picture environmentally and thus should NOT dominate wolf management. This plan gives wildlife managers more than enough “tools” to deal with “problem wolves”, but if it were up to the Cattlemen, they would not be shooting at wolves with plastic bullets (just as they were not up until 1946, when Oregon’s last wolf was killed). With recovering populations in the low double digits, now is not the time to be weakening Oregon’s wolf plan—which came out of a significant compromise from wolf advocates and others. This plan needs to be strengthened and fully funded.

Wolves are key to the health of their habitats—we are all connected in the web of life.

I thank you for your time and kind attention.

Sincerely,
Denise Lytle
73 Poplar St.
Fords, NJ 08863
Check out The Happy Harpy at Cafe Press & Etsy & pass it on!

http://www.cafepress.com/happyharpy

http://www.etsy.com/shop.php?user_id=7113778

Click to donate for free on the Care2 Network!

http://www.care2.com/click2donate/

Become an Ocean Defender today!
http://oceans.greenpeace.org/

Care2 make the world greener!

Care2 makes it easy for everyone to live a healthy, green lifestyle and impact the causes you care about most. Over 12 Million members! http://www.care2.com

Feed a child by searching the web! Learn how http://www.care2.com/toolbar
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* Raise the breeding pair limit from 3 to 12 to ensure the survival of a healthy wolf population in Oregon.

Sincerely
Ninette Jones
7637 n Interstate
Portland Or 97217
Dear ODFW,

As you review Oregon’s Wolf Conservation and Management Plan, I urge you to consider implementing stronger protections for Oregon's wolf population.

Wolves are part of Oregon's native infrastructure, much like myself. Every part of this infrastructure has a role to play.

Powerful special interests should not be able to make these decisions. Instead these decisions should be made using the best science available.

I submit that there are other ways to protect livestock than further decimation of our already very fragile wolf population.

Very Sincerely,

Roger Kofler
17177 SE Jennings Crest Ln.
Jennings Lodge, OR 97267
To Whom It May Concern,

I am writing to register my support of continued and expanded protection of wolf packs in Oregon. I urge those involved in the Plan review not to capitulate to unreasonable demands of the Cattlemen's Association and others to have free rein to exterminate wolves at their discretion. The management of wolf populations must remain in the hands of biologists and wildlife managers who recognize the vital role that these top predators have been proven to serve in the maintenance of healthy and diverse ecosystems. To this end, I would also urge your support in expanding the protection of these animals to include more breeding pairs, thus ensuring a robust and varied population.

The survival of these wolves must not be allowed to be determined by a narrow view of the short-term economic impacts on a small minority of ranchers - impacts which, upon critical examination, have been shown to be quite small. The restoration of healthy, wild ecosystems to our public lands serves the greater good of our country, and will be a far better legacy to our future generations than will the continued dominance and degradation of these resources by 19th Century policies and greed.

Thank You for your consideration,

Michael Elston
Oregon City, OR
Dear ODFW,

As you review Oregon’s Wolf Conservation and Management Plan, I urge you to consider implementing stronger protections for Oregon’s wolves.

Up until recently the middle of the last century wolves were an important part of the ecosystem here in Oregon, and their return will help to strengthen an environment that continues to be taxed by industry and agriculture.

The rural areas of Oregon belong to all Oregonians, and should not just be considered the domain of ranchers and other livestock farmers. These ranchers should be compensated for losses they sustained from the wolves, but they should certainly not be allowed to exterminate members of a population of less than 20 wolves. I object to this as an Oregon landowner, taxpayer, and citizen. This fledgling wolf population must be allowed to grow for the sake of our state’s ecosystem. The killing of wolves for the short term financial interests of ranchers should be illegal, and people that violate these laws should be punished.

Very Sincerely,

Edward Mainwaring
3723 SE 27th Ave
Portland, OR 97202
Dear ODFW,

While you are reviewing Oregon's Wolf Conservation Management Plan, I urge you to consider the following:

1) wolves are NATURAL predators
2) natural predators are vital to health and survival of ANY ecosystem
3) you are deciding the ultimate fate of an already endangered species
4) this 'conservation and management' plan should aim to protect this species, AND the ecosystems that it inhabits, NOT the special interests of a few, minority voices.
5) This plan is severely underfunded.
6) 4 breeding pairs is simply not enough to ensure the survival of this species. Natural selection requires biodiversity.
7) non-lethal tools, community education, and outreach are the only plausible ways to resolve this conflict.

PLEASE redouble your efforts and put everything you can into helping protect this species, and the beautiful ecosystems of Oregon for the benefit of all: people and animals alike.

Thank you for taking my comments.

Sincerely,
Arianna E. Vielbig

Arianna Vielbig
2205 Polk St
Eugene, OR 97405
ODFW: Seems to me that Oregon should bend over backwards to "manage" its wolf population without resorting to killing the critters!

Very Sincerely,

John Witte
4855 SE Tenino CT
Portland, OR 97206
MANAGEMENT OF PREDATORS—A NEED FOR CHANGES IN POLICIES (Draft) George Wuerthner
gwuerthner@gmail.com
ABSTRACT: Management of predators has largely been based on extirpation and/or a grudging
tolerance of low populations. While extirpation of predators is no longer the goal of
wildlife agencies, current state wildlife policies whose goals are often to maintain
populations above extinction levels, rather than maximize biological carrying capacity,
often ignores the ecological influence of predators in terms of ecosystem organization.
Furthermore, management for populations without considering of social organization of top
predators, can lead to greater conflicts with humans, particularly livestock owners and
hunters, two groups who are often hostile to predators in the first place.

Introduction
Predators have always been a controversial subject in wildlife management. Traditionally
predators were viewed as competition for hunters and a threat to the livelihood of
livestock owners. Informally, the motto “the only good predator was a dead predator”
historically represented the prevailing attitude of most European Americans. Changing
-cultural values now give greater consideration to the ecological value of wolves, and have
resulted in changes in public policies best represented by the attempt to recover wolves
-with their historic range in the United States. Yet negative attitudes towards predators
from hunters and ranchers still dominate management policies of state wildlife agencies.
Unfortunately, current predator management policies of state agencies tends to reinforce
negative attitudes and hostility to predators both in how agencies frame the issue of
predators, as well as by advocating indiscriminate control that ignores predator ecology
and disrupts social organization.

Historical Background
Historically European settlers in North America brought negative attitudes towards
predators with them when they colonized the continent. Predator extirpation was one of the
early activities of many colonial, territorial and state governments. For instance, in
1630, just ten years after the Mayflower landed, the Massachusetts Bay colonists enacted a
bounty on wolves. One of the first political actions of settlers in Oregon Territory
were so-called “wolf meetings.” The first such meeting, held in 1843, levied a $5
assessment on each settler to pay for bounties on predators. Similarly, some 80,730
wolves were killed in Montana and $342,764 in bounties was paid between 1883 and 1918.

Eventually the burden of paying for predator bounties was transferred to the Federal
Government. In 1907, in exchange for paying grazing fees to graze on federal lands, the US
Forest Service entered into agreements with ranchers to control wolves on national
forests. Authority for predator control was later transferred to the Bureau of Biological
Survey in 1914. Professional hunters were hired by the Bureau to track down and kill
predators with as many as 200 men in the employ of the government at the height of
 predator extermination efforts. As a consequence of government extirpation efforts,
combined with on-going unceasing slaughter by hunters, ranchers, and settlers, both
grizzly and wolves were nearly extirpated from the West by the 1940s. Other species like
mountain lion fared slightly better, in part because they were less vulnerable to
poisoning efforts, but were nevertheless reduced to half of their natural geographic
range.

Changes in attitudes towards predators came slowly. One of the first organizations to
question the pervasive notion that the only good predator is a dead one was the American
Society of Mammalogists who issued a report in 1928 asserting that predators had
scientific, economic and educational value. The mammalogists called for protection of
predators in national parks and other public lands. By the 1930s visionary biologists
like George Wright and Adoph Murie were calling for an end to predator control in the national parks. And ecological Aldo Leopold, who wrote the first textbook on game management, eventually came to see predators as an intrinsic part of nature. In 1949 he published his book A Sand County Almanac which included his powerful essay “Thinking like a Mountain” where he describes the changes in his ideas about the role of predators in nature.

In response to changing public attitudes towards predators, most states have given “game” animal status to larger predators. For instance, mountain lions were nearly extirpated from Oregon by the 1960s. In 1967 Oregon listed mountain lions as “game animals”, enacting hunting seasons and attempting to maintain viable populations of the animal. As a consequence, mountain lions populations rose from 214 in 1961 to 3,114 by 1994.

The ecological and philosophical value of predators was given greater legal status and protection when Congress enacted the Endangered Species Act (ESA) in 1973. The Act provided protection to species that were considered endangered or threatened and provides a mechanism for protection of habitat. Of the species given early protection under the ESA, both the grizzly and the gray wolf were listed as endangered in the lower 48 states, along with the Florida panther (mountain lion).

A transformation in public attitudes from utilitarian to more non-utilitarian values of wildlife are forcing wildlife agencies to change, often grudgingly, their management of wildlife, including predators with more emphasize on restoring intact ecosystems and less toward sustainable yield of meat. Yet hostile attitudes towards predators among many hunters, outfitters, and ranchers remain. For instance, Lynn Madsen, owner of Yellowstone Outfitters in Wyoming was quoted at an anti wolf rally in Jackson Hole, Wyoming as saying: “They (wolves) have put people, literally, out of business,” he said. “The only thing that keeps Wyoming in the running is the (elk) feedgrounds.” Similarly Ron Gillett, an Idaho outfitter was quoted in High Country News article suggesting wolves "are the most cruel, vicious animal in North America... the only predator that eats its prey alive because they like the taste of warm blood!" Enviros - the "wolf-thug terrorist groups"—are full of "crap" and "baloney" when they claim wolves have little impact. "When they turned wolves loose, they were having toasts that hunting in Idaho would soon be over!"

States Control Wildlife Management

Despite legal and philosophical changes, predators are still treated differently from other wildlife species. Unless a species is listed under the ESA, management of wildlife is under the jurisdiction of state wildlife agencies. Most state agencies are required to manage for viable populations of all wildlife species; however, there is no requirement to manage for ecological heath.

Many pro-hunting organizations, though more moderate in their rhetoric than some of the outfitters quoted above, demand that agencies manage predators the same as any other wildlife. For instance, M. David Allen, President of the Rocky Mountain Elk Foundation wrote in Bugle Magazine, the publication of the Rocky Mountain Elk Foundation, that “we should be actively managing them through regulated hunting and other prescribed methods.” In other newspaper editorials Allan has stated that “Every wildlife conservation agency, both state and federal, working at ground zero of wolf restoration—Idaho, Montana and Wyoming—has abundant data to demonstrate how undermanaged wolf populations can compromise local elk herds and local livestock production. There’s just no dispute, and emotion-over-science is not the way to professionally manage wildlife.” The implied message is that a decline in elk herds as a result of predation (or any other game species desired by hunters) is undesirable and unacceptable to hunters. To the more moderate pro hunting organizations the stance is that wolves are OK so long it doesn’t affect hunting success, in other words so long as wolves do not have a real ecological influence.

This strong pressure to reduce predation effects upon favored game species has a significant influence upon state wildlife agencies. Wildlife agencies have a direct conflict of interest when it comes to managing predators since all state wildlife agencies depend on license fees to fund their programs. Thus, while stated implicitly or not, the main goal of most wildlife management is to maximize species considered desirable to hunters like elk and deer, and often at the expense of other species, including predators.
Since predators can limit populations of large ungulates, state agencies generally tend to manage predators, particularly large predators like mountain lion (cougars), wolves, and bears far below their biological carrying capacity, and as a result limit their ecological influence upon ecosystems. The union of hunters with stockmen and state wildlife agencies as well as other government agencies like Wildlife Services (which kills predators) formed what one author termed a “diamond triangle” that dominates and exercises disproportionate control over predator management policies.

For instance, coyotes are treated as varmint by all wildlife agencies with no closed season or limits on the kill. Other predators like mountain lion, wolves, and grizzlies are often managed to maintain populations well below biological carrying capacity based upon perceptions of public acceptance, particularly among hunters and livestock owners.

In response to the perception that wildlife agencies were overly biased against predators, citizens in some states have taken management of some predators away from wildlife agencies. For instance, in 1990 California voters supported an initiative that banned sport hunting of mountain lion (cougar). Similar efforts to reduce the kill of mountain lions were passed in Oregon and Washington which ban the use of hounds to hunt the animals.

Oregon hunters and livestock owners attempted to reverse the public vote by a second referendum to reinstitute hound hunting of mountain lion. But Oregon citizens voted to maintain the ban. In response wildlife agencies responded to this citizen ban on hound hunting of mountain lions by significantly reducing the cost of mountain lion licenses (making them virtually free) and lengthening the hunting season in an effort to maximize the kill on mountain lions. For instance in 2009, 42,000 mountain lion licenses were sold in Oregon.

In 2006 the Oregon Fish and Game Commission also voted to allow federal agents to use dogs to track mountain lions. And in what mountain lion supporters view as an end run around the state hunting ban, the Commission also voted to permit private hound hunters to be appointed by the state to “assist” federal agents in the tracking and killing of mountain lions. Not just animals that may have attacked livestock, but any animals deemed “potentially” a stock killer. As a consequence, the number of mountain lion killed in Oregon has actually increased since the ban on hound hunting of mountain lion was implemented.

A similar citizen ban on use of dogs in mountain lion hunting passed in Washington in 1996. Just as in Oregon, the Washington Fish and Game agency responded by increasing the length of the mountain lion hunting season and bag limits and combined the mountain license with a general license to hunt elk and deer, increasing greatly the potential legal number of mountain lion hunters. These changes lead to increased mortality for mountain lions, thereby nullifying the ban’s original purposes.

State agencies say they are responding to concerns about public safety, arguing that large predator populations are a threat to humans. Agencies claim they are receiving more complaints from the public about conflicts between mountain lion and the public, and are merely responding to public safety concerns.

Agencies respond to hunter’s dismay over declines in huntable animals like elk, but frequently fail to counter negative viewpoints by noting the positive ecological effects resulting from predation on ungulates.

Critics of state wildlife agency predator management claim that Fish and Wildlife departments often feed public fears about predators through indirect and subtle propaganda campaigns that exaggerate the threat of predator attacks. They suggest agencies may be contributing to the rise in complaints by increasing outreach and making a greater efforts to seek and track complaints. In addition, critics argue that agencies emphasize any decline huntable species like elk or deer attributed to predators without a corresponding attempt to place such declines in historic perspective (often prey numbers are historic highs and may decline somewhat but well within the normal carrying capacity for a region). Agencies also do little to place a decline in ungulate number within an ecological perspective (i.e. enumerating the ecological and ecosystem services that predators provide).

Proponents of predator control suggest that without hunting, predators become habituated
to humans, and thus pose a greater safety threat to humans. However, a study of mountain
tion attacks on humans finds no compelling evidence that hunting and population control
reduces attacks on humans. Beiers notes that mountain lion are heavily hunted and
controlled on Vancouver Island, BC. In a paper on the topic, he says “Compared to other
North American cougar population, Vancouver's cougar population may be the least
habituated to humans and the most subject to aversive conditioning. Nonetheless Vancouver
Island has by far the highest concentration of cougar attacks on humans. This fact seems
difficult to reconcile with the habituation hypothesis.”

Ecological Role of Predators

Many state wildlife agencies because of their desire to maximize populations of ungulates
such as elk, moose, caribou and deer for hunters, do not emphasize the ecological benefits
of predators in shaping ecosystems. Predators are maintained at population levels so their
ecological role as top down predators and influence in tropic cascades are muted, and/or
non-existent.

Recent research on the ecological role of predators in exerting top-down influences upon
prey populations with long term consequences for vegetative communities demonstrates that
predator influence has significant ecological consequences for ecosystem health. Tropic
cascades where “top down” controls on herbivores by predators and prevent over
exploitation of vegetation has been postulated and confirmed in various places.

Terborgh et. al. describe the ecological consequences of loss of predators in forest
fragments created by hydroelectric development in Venezuela. There, predators of
vertebrates are absent, and densities of rodents, howler monkeys, iguanas, and leaf-cutter
ants are 10 to 100 times greater than on the nearby mainland, suggesting that predators
normally limit their populations. The densities of seedlings and saplings of canopy trees
were severely reduced on herbivore-affected islands, providing evidence of a trophic
cascade unleashed in the absence of top-down regulation.

The presence of predators creates what some biologists are calling ecology of fear in prey
species like elk. Animals have the ability to learn and can respond to differing levels of
predation risk and will respond to fear of predation with measurable responses including
changes in densities, vigilance observations, and foraging effects on plants.

Robert L. Beschta and William J. Ripple describe similar findings on the absence of wolves
in Olympic National Park and how elk browsing has influenced plant communities. In Olympic
National Park where wolves were extirpated in the early 1900s, Beschta and Ripple found
significantly decreased recruitment of bigleaf maple and cottonwood along riparian areas
which they attribute to heavy elk browsing in the absence of wolves.

A study of the influence of wolves upon elk by Hebblewhite and colleagues in Banff
National Park found that the absence of wolves in one part of the Bow River Valley
permitted elk numbers to increase an order of magnitude. Annual survival of adult female
elk was 62% in the high-wolf area vs. 89% in the low-wolf area. Annual recruitment of
calves was 15% in the high-wolf area vs. 27% without wolves. Wolf exclusion decreased
aspen recruitment, willow production, and increased willow and aspen browsing intensity.
Herbivory by elk negatively affected beaver lodge density. Loss of beaver, has several
negative effects. Beaver dams help control flooding and provide water storage that helps
to maintain stream flow in late summer benefiting fish and other aquatic life. Plus beaver
and their dams create wet meadows which are utilized by many wildlife species. For
instance, Hebblewhite and colleagues found that elk herbivory had an indirect negative
effect on riparian songbird diversity and abundance.

Ripple and Beschta found an increase in cottonwood recruitment in Yellowstone National
Park after restoration of wolves. And Ripple and Larson reported that aspen regeneration
in Yellowstone National Park essentially stopped by the 1920s once elk populations
expanded with protection afforded by the park and the concurrent extirpation of wolves
from the park.

Ripple and Beschta compiled information from five parks, including Yellowstone, Olympic,
Yosemite, Wind Cave and Zion and concluded the absence of large predators allowed
herbivores to alter plant community structure.

Another study just outside of Yellowstone in the Gallatin Range found similar results. In
the absence of large predators, elk herbivory significantly reduced aspen recruitment.

Beschta and Ripple also found that riparian vegetation and hydrological function was influenced by the elk browsing which they hypothesize is a consequence of wolf extirpation. In a study of the Gallatin River northwest of Yellowstone National Park they compared channel cross-sections on three reaches of the upper Gallatin River. Willow cover on floodplains averaged 85 per cent on the transect that was outside of the wintering range of elk, but only 26 per cent and 5 per cent for reaches dominated by wintering elk.

Beyer and colleagues studying willow in Yellowstone National Park found a two-fold growth in the plants after reintroduction of wolves that could not be explained by climate and/or other factors. The researchers believe that wolf presence changed habitat use by elk.

Another consequence of the loss of apex or top predators is meso predator release where the loss of a top predator allows smaller predators to increase in numbers and distribution. Meso predator release was coined by Michael Soule in a paper published in 1988.

This phenomena has been observed at numerous levels. Meso predator release, for instance, is blamed for increased predation on ground nesting birds in the eastern U.S. In this case, it is the control and reduction in coyotes which releases other predators like raccoons and skunks.

The presence of wolves was found to limit and redistribute coyotes. Coyote densities declined by 33% in Grand Teton National Park and 39% in Yellowstone National Park in wolf abundant sites after wolf restoration.

The changes in coyote population and distribution had indirect and direct effects. For instance, Kim Berger and colleagues found four times higher pronghorn fawn survival in areas dominated by wolves because wolf presence lead to a reduction in coyote predation on pronghorn fawns.

The presence of wolves may even affect rodent populations. Miller and colleagues studying vole populations near wolf dens and away from wolf dens found greater numbers of voles near dens. They were able to document that coyotes, a major predator on voles, avoided wolf activity centers like wolf dens, hence led to a reduction in predation on voles by coyotes. They were unable to document, but speculated that more abundant vole populations near wolf dens may lead to greater utilization by other vole predators from weasels to hawks.

Top predators such as wolves also create carrion that is utilized by scavengers, including bears, ravens, magpies, wolverine and coyotes, among others. Wilmers and colleagues studying carrion use by scavengers found that wolves increased the time period over which carrion is available and decreased. For example, grizzly bear coming out of hibernation have little vegetative food to eat. Finding wolf killed carrion can help bears through the late winter and early spring season of food scarcity and may be important for bear survival.

One study even suggests that top predators and their creation of carrion may ameliorate the effects of climate change. Wilmers and Getz looked at the long term climate data for Yellowstone National Park and found that winters are warmer and shorter. As a consequence, they hypothesize this would result in less winter kill and thus carrion. However, the recent restoration of wolves to the park which create carrion may provide scavengers with an on-going source of late winter food.

Another study on the interaction between climate and predators by Hebblewhite in Banff National Park in Alberta found that the North Pacific Oscillation (NPO) influenced winter elk survival, with harsher winter weather strongly reducing elk numbers. However, in areas where wolves were present, elk were even more vulnerable and had greater population declines. Hebblewhite concluded that the effects of NPO were weaker in the absence of wolf predation. This “predator effect” might serve to more quickly balance herbivore numbers to the available forage base and may be important to plant communities by providing vegetation with respite from heavy herbivory pressure.

PREDATOR INFLUENCES ON PREY BEHAVIOR
Many state wildlife agencies suggest that hunting can mimic the role of top predators. Recent research demonstrates that predators have different influences on prey species than hunters.

However, hunters tend to select different age and sex animals from predators. In a study of comparing the elk killed by hunters with elk taken by predators, researchers found that hunters selected a large proportion of female elk with the greatest reproductive values, whereas wolves killed a large proportion of elk calves and older females with low reproductive values. The mean age of adult females killed by hunters throughout the study period was 6.5 years, whereas the mean age of adult females killed by wolves was 13.9 years. They concluded that hunting exerted a greater total reproductive impact on the elk herd than wolf predation.

Another study of winter wolf predation on elk in Yellowstone by Smith et. al. found that 43% of the elk killed were calves, 28% were adult females (cows), 21% were adult males (bulls), and 9% were of unknown age/sex. Comparing prey selection to prey availability, wolf packs residing on the northern range (NR) of the GYE selected for elk calves, and against cows, but approximately proportional to availability for bulls. The selection for calves by wolves, in particular, is considerably different from the typical selection made by human hunters.

There is also evidence to suggest that human hunters are causing rapid evolutionary changes in wildlife species different from the influence exerted by native predators. A review of human caused changes in hunted species found average declines of almost 20% in size-related traits and shifts in life history traits of nearly 25%.

Another difference between human hunters and native predators is the seasonality of influence. While it’s well documented that elk will seek out safety refugia like private ranchers to avoid hunters during the hunting season, such shifts in habitat are short lived. By contrast, native predators like wolves can influence elk and other prey behavior throughout the year.

And unlike human hunters which may provide a seasonal input of carrion resulting from gut piles left by hunters and/or the subsequent death of wounded animals, predation by large predators like wolves has a different spatial and temporal influence on carrion abundance and thus availability to scavengers.

A study in Yellowstone National Park comparing habitat use by elk before and after wolf restoration demonstrated that in summer, elk avoided wolves when wolf activity was centered around dens and rendezvous sites by selecting higher elevations, less open habitat, more burned forest, and, in areas of high wolf density, steeper slopes than they had before wolf reintroduction.

A study of wolf and cougar predation influence and effects on elk in the Madison Range in Montana found that wolves preyed primarily on male elk in poor condition, the exact opposite of human hunters who tend to kill mature bulls in prime condition.

And the year round presence of large predators, even in the absence of direct predation, may even influence reproductive fitness, leading to reductions in prey populations.

Hunting of ungulates, the prime prey of top predators, may actually lead to greater conflicts with livestock productions. In some areas Fish and Wildlife agencies maintain ungulates like elk at their “political” rather than biological carrying capacity—in other words the perceived tolerance of large landowners, typically ranchers.

According to research on wolves in Europe, this may actually increase predation by wolves on livestock. In North America, the rural agricultural areas where wolves occur are often frequented by wild and domestic ungulates, both of which the wolves prey upon. Managing for high densities of wild ungulates could result in decreased livestock depredation by wolves.

In addition, human hunting pressure can force elk to seek refuge on private ranchlands that may be inaccessible and/or closed to public hunting. While human hunters may not be able to follow the elk on to these ranchlands, wolves can and do, thus setting up a
situation where predators may kill livestock.

PREDATOR SOCIAL INTERACTIONS IGNORED BY STATE AGENCIES

Most of what we know about predators is by studying animal groups under duress. Nearly all predators are trapped and hunted, thus much of what we assume about their behavior may be skewed or misinterpreted.

In a study of Washington mountain lions (cougars)

Robert Crabtree, studying coyotes in Yellowstone National Park, found that unexploited coyotes behaved much more like wolves, with a dominant pair doing the breeding, while sub dominant adults helped with raising pups. Territories were held for long periods of time, often decades.

Wolf biologist, Gordon Haber who studied wolves in Denali National Park for 40 years until his untimely death in an airplane crash, argues that social behavior and social organization that emphasizes group hunting and cooperate breeding requires a different response in management. According to Haber family groups are the preeminent functional units, not meta populations, and it is this behavior that predominates that most defines wolves as a species. Haber claims at least one family lineage in Denali National Park may have occupied the Toklat River drainage continuously since they were studied by Adoph Murie in the 1930s. As a consequence there is multi-generational learned behavior and “cultural” knowledge transmitted from wolf to wolf about prey location, hunting opportunities and other information important for survival.

Writing in Conservation Biology, Haber argues the widespread assertion that wolves can maintain a 25-50% mortality without biological consequences ignores the damage done to social interactions and long term degradation of predator social cohesion. Haber suggests that “true sustained- yield management requires more emphasis on qualitative biological features to determine the extent to which wolves and other species with evolutionary histories as predators, rather than as prey, should be harvested.”

There are studies of other animals that demonstrate that stable social structure contributes to long term viability and productivity of social members. Female elephants (Loxodonta africana), for instance, in well established family groups have lower levels of stress hormones and higher reproductive output than those in groups that have been socially disrupted by poaching.

A study comparing a heavily hunted mountain lion population and a lightly hunted one in Washington demonstrated that hunting did disrupt social relationship and demographics. Researchers found that heavy harvest resulted in higher immigration, reduced kitten survival, reduced female population growth, and a younger overall age structure. Light harvest corresponded with increased emigration, higher kitten survival, increased female population growth, and an older overall age structure. The researchers concluded that “contrary to accepted belief, our findings suggest that cougars in the Pacific Northwest are currently declining.”

Lambert and colleagues hypothesized that among other factors, “increased conflicts between cougars and humans in this area could be the result of the very young age structure of the population caused by heavy hunting.”

A study of wolves near Algonquin Park in Ontario demonstrated clearly the negative impacts of hunting on wolf social structure. Linda Rutledge and colleagues found that after a hunting ban outside the park was instituted, human-caused mortality decreased, but was largely offset by natural mortality, such that wolf density has remained relatively constant at approximately three wolves/100 km2. However, the number of wolf packs with unrelated adopted animals decreased from 80% to 6%, indicating a much more stable social organization.

Disruption of social organization has important consequences for wolf management. A number of studies have documented that increased prey demands are associated with the birth and growth of pups. If the “cultural knowledge” of where to hunt and/or ability of a pack to effectively hunt is destroyed by loss of key pack members, creating more unstable social
systems, the remaining pack member may be more prone to attack livestock and/or wander into new territories. Such social interactions are totally ignored by “population” oriented wildlife management which merely attempts to maintain population numbers rather than social cohesiveness.

Plus indiscriminate hunting (i.e. the opportunistic killing of predators by hunters) can disrupt social cohesion in predators, reduce the ability of an animal and/or pack to hold a territory, reduce its effectiveness in hunting (thereby making it more likely to attack livestock), and can also skew overall population towards a younger age cohort.

If livestock is available to wolves during this critical period, the likelihood of predator losses is significantly increased. Thus the seasonality of grazing determined predator opportunity and thus conflicts with livestock producers.

A review by Karlsson and Johansson of predation on livestock in Europe demonstrated that once a farm or ranch suffers a predation event, it is much more likely to experience additional predator losses. In their study, depredated farms were approximately a 55 times higher risk for a repeat predation event within 12 months compared to other farms in the same area. The researchers believe predators, attracted by carrion, are more likely to attack additional livestock, making clear that rapid removal of dead animals may be a potential way to reduce predator opportunity.

However, the mere presence of livestock within wolf territory does not automatically result in predation. Chavez and Gese in a study of wolves in agricultural areas of Minnesota found that radio collared wolves passed directly through a pasture containing cattle on 28% of the nights of tracking. And that 58% and 95% of the wolf locations were within 1 km and 5 km from a pasture, respectively. Space use of wolves in this study demonstrated that wolves visited livestock pastures during the 24-hour tracking sessions; they apparently were passing through these pastures with cattle and not preying on livestock.

Thus not all wolves are inclined to kill livestock, and it’s likely that animal husbandry practices (such as lambing and calving sheds, herders, guard dogs, night time corralling and barn use), as well as other methods may discourage predator opportunity. One study of wolf predation on domestic sheep in the French Alps found that confining or simply gathering sheep at night in the presence of 5 livestock-guarding dogs was predicted to prevent most kills (94% and 79%, respectively) that would have occurred in similar conditions but with free-ranging sheep.

The presence of domestic livestock can contribute to conflicts between predators and ranchers. Domestic livestock dietary overlap with native species like elk and deer is well document, especially on poor condition rangelands. Thus forage consumption by domestic animals can reduce the biological carrying capacity of the land for native prey species.

In addition, social displacement of key prey species by livestock can also influence predation rates. Many wildlife species including elk and deer are known to abandon pastures where livestock are presence. Thus if wolves den in an area in the spring where natural prey like elk are abundant, only to have the elk abandon the area once livestock are moved on to a grazing allotment as occurs on many public lands in the West, it may leave predators, especially those with dependent young little choice but to prey upon domestic livestock.

In effect, livestock producers over much of the West have been successful in externalizing one of their operational costs—predator losses—by extirpation and/or reduction in predators. Opportunities to reduce predator losses by changing grazing practices are not likely to be implemented as long as the public continues to subsidize livestock operations with predator control.

Hayes and Harestad found evidence that compared to unexploited populations, packs experiencing control and/or hunting had higher mortality rates as a direct consequence of reductions, pack sizes are smaller, home ranges were less stable and occupied at variable times, and more young are produced in the population.

Younger animals may breed earlier, and in exploited populations produce more young. Young growing pups consume more biomass (meat) than adults, creating a greater need to obtain
food. Typically in exploited populations, pack size is smaller, with only the breeding adults to raise pups, putting greater pressure on adults to obtain easily available meat. Plus young pups reduce the mobility of the pack, limiting the area where adults can seek prey. Thus indiscriminate hunting puts increased pressure on the few adults to obtain meat, often by attacking livestock.

The effects of lethal control and/or hunting on pack stability can lead to social disruptions and loss of territory. A study which pooled data on 148 breeding wolf packs showed that the loss of adult breeders (from any causes including natural mortality) often leads to the dissolution of the pack and loss of pack territory, and/or limited breeding in the following season. For instance, in 47 of 123 cases (38.2%), groups dissolved and abandoned their territories after breeder loss. Of dissolved groups, territorial wolves became reestablished in 25 cases (53.2%), and in an additional 10 cases (21.3%) neighboring wolves usurped vacant territories. Thus any increases in mortality caused by human hunting and/or lethal control may disrupt social interactions between packs, and lead to the loss of social/cultural knowledge that long time residency by family lineages may provide.

An on-going study in Washington confirms this trend. According to Dr. Robert Wielgus, killing large numbers of mountain lion (cougars) creates social chaos. Ironically as cougar population declined due to increased mortality from hunting, complains about exploding cougar populations and human conflicts increased. The incidence of cougar complaints, which averaged about 250 a year before Washington increased cougar hunting effort, more than doubled the following year before peaking at 936 in 2000, all the while cougar populations were declining as a consequence of hunter mortality.

Researchers attribute this increase in human conflicts to the social disruption created by hunting. According to Wielgus trophy hunters often target adult males, which act as a stabilizing force in cougar populations, loss of mature male cougars permits young males to occupy territory. "The adults police large territories and kill or drive out young males. With the grown-ups gone, the "young hooligans" run wild," Wielgus says. Evidence suggests cougars under two years of age, just learning to live on their own, account for the majority of run-ins with people and domestic animals. "You don't get to be an old cougar by doing stupid stuff like hanging out in backyards and eating cats," Wielgus says.

Carroll et al. warn that social carnivores such as the wolf, which often require larger territories than solitary species of similar size, may be more vulnerable to environmental stochasticity and landscape fragmentation than their vagility and fecundity would suggest.

This creates a vicious circle of self fulfilling feedback mechanisms, whereby livestock owners demand greater predator control, which state wildlife agencies are only too happy to provide since in general they want fewer predators preying on game animals which hunters want to shoot. Hunters are encouraged to kill more predators, disrupting social organization and skewing the population to younger animals, which in turn are more likely to kill livestock, leading to ever more demands for more "predator control."

Predator control may be creating other conflicts with livestock producers as well. Artificial feeding of elk that leads to winter congregations has been documented to increase the occurrence of brucellosis infection in wildlife. There is evident that wolf predation (as well as other predators) can reduce disease occurrence and thus transmission from wildlife to livestock. For instance, researchers in the Greater Yellowstone Ecosystem found that wolves helped to disperse elk and apparently kept brucellosis infection low under natural conditions. Under more crowded conditions in feedlots, brucellosis infection rates are much higher. Brucellosis is a major concern to ranchers since it can cause abortion of fetuses in livestock and bison that wander out of Yellowstone Park are routinely killed by the Montana Dept of Livestock to prevent brucellosis transmission from bison to cattle. Recent occurrence of brucellosis in cattle due to elk transmission is fueling fears that ranchers may soon demand elk control as well.

Livestock Losses to Predators Exaggerated

Perhaps one of the most perplexing aspects about predator management is the unrealistic and exaggerated importance of livestock losses attributed to predators. Notwithstanding the fact that any loss to predators can be significant to individual livestock producers, overall predators are not a threat to the livestock industry as a whole.

For instance, in 2005 only 5% of all cattle losses in the continental U.S. in 2005 were attributable to predators. In addition, only 0.11% of all cattle losses in 2005 were due to predation by wolves. Coyotes killed more than 22 times more cattle, domestic dogs
killed almost 5 times as many cattle, and vultures killed almost twice as many cattle as wolves did in 2005. Interestingly, theft was responsible for almost 5 times as many cattle losses as were lost by wolf predation.

Source: NASS

In 2009, wolves killed 365 sheep, cattle, horses and dogs. Domestic dogs killed

In 2009 confirmed cattle losses were 192. This was lower than in 2008 when 214 were killed. However, confirmed sheep losses were 721, almost double the 355 reported in 2008.

A total of 478 wolves were killed by either hunters or agency personnel. Montana removed 145 wolves by agency control and 72 by hunting. Idaho removed 93 by agency control and 134 by hunting. In Wyoming, 32 wolves were removed by agency control. In Oregon two wolves were removed by agency control.

These numbers could be expected to change as wolf numbers increase, but there are reasons to believe the presence of wolves may actually reduce livestock losses.

A Case Study: Management of Wolves

The management of gray wolves in the northern Rockies provides a case study in the problems associated with current management paradigms with regards to top predators. While there are differences in the behavior, prey selection and resource allocations between top predators, most share some common attributes with regards to how state agencies manage them or perhaps mismanage them. The current debate over wolf management demonstrates the conflicts that dominate wildlife agency policies.

The gray wolf was listed under the Endangered Species in 1974. Natural recolonization of the northern Rockies near Glacier National Park began in the 1980s. In order to speed recovery efforts, the U.S. Fish and Wildlife Service reintroduced wolves into two other recovery zones—Central Idaho and Greater Yellowstone Ecosystem. Wolves were trapped in Canada and released in these zones in 1995 and again in 1996. Wolves in these two areas were considered "experimental and non-essential" populations and thus had reduced protections under the ESA. This permitted the Fish and Wildlife Service to kill any wolves that were deemed harmful to the long term prospects of species recovery. Typically wolves were killed after depredation on livestock. In reality wolves both in the Glacier Park recovery area, as well as other recovery zones, were treated essentially the same, and were regularly killed by the Fish and Wildlife Service in response to documented predation upon livestock and/or pets.

From that start, the population has grown to more than 1600 wolves in the three state areas so that by 2009, the government proposed delisting of wolves in Montana and Idaho and handing management over to state wildlife agencies. The FWS retained management control over wolves in Wyoming because of conflicts over management policies with that state which proposed making wolves "predators" over most of the state with year round open season and no limits on hunting. Meanwhile environmental organizations sued to reverse delisting based on several fine points of the law, including the requirement by the Gray Wolf Recovery Plan that genetic exchange between all three recovery zones had to be documented before delisting could occur and that under delisting rules, wolf populations could dip as low as 300 animals. Despite significant long distance dispersal of wolves into adjacent states, as of 2010, no genetic exchange has been documented between wolves in the Greater Yellowstone Ecosystem and other recovery zones.

Meanwhile, in response to delisting by the federal government, both Idaho and Montana in an attempt to control wolves instituted hunting seasons. By March of 2010 hunters had
killed 159 wolves in Idaho and 72 in Montana. Additional wolves were killed by Wildlife
Services in response to livestock depredation. At the end of 2009 the northern Rockies
gray wolf population was estimated to include 525 wolves in Montana, 320 wolves in Wyoming
and at least 843 wolves in Idaho. Three packs are now verified in Oregon and Washington.

State wildlife agencies, and the Fish and Wildlife Service argue that hunting does not
endanger wolf recovery. In a narrow sense they are correct. It is unlikely that hunting,
alone, would reduce wolf populations to critical levels. However, indiscriminate hunting,
along with livestock depredation control deaths, and disease might jeopardize at least
local populations. Most wildlife agencies maintain the position that regional numbers or
meta populations are the only valid consideration in evaluating hunting, trapping and
control programs on wolves. Such concerns are the crudest measure one can employ in
wildlife management and ignores much of the latest research on evolutionary behavior, and
the ecological importance of predators in structuring ecosystem function.

More importantly, state agency management goals to maintain predators at populations lower
than biological carrying capacity does have other consequences. It is increasingly obvious
that top predators play an important role in ecosystem regulation. Plus indiscriminate
hunting and killing of predators can actually increase conflicts with humans—the opposite
of what wildlife agencies profess is their goal.

George Wuerthner
1990 Augusta
Eugene, OR 97403
Dear Commissioners:

The constant and escalating hysteria against wolves in NE Oregon has put more than half of Oregon's wolves in danger of being exterminated.

This relentless and dishonest media campaign by the Oregon Cattlemens' Assoc. is aimed at exterminating the Imnaha pack near Joseph. This pack of 10 accounts for more than half of our known wolf population of 14. Ranchers are claiming many calves killed despite only ONE confirmed case of depredation from a population of 36,500 cattle county-wide.

Many NE Oregon ranchers have taken no proactive non-lethal measures to protect their livestock, such as the use of fladry, range riders, or burying their dead animals deep enough so as not to attract wolves. Equipment and help to pay for these measures and others are available from Defenders of Wildlife and the ODFW. Defenders compensates all confirmed losses at market prices.

The OCA was responsible in 2005 and 2007 for blocking passage of the legislation called for in the OR wolf plan that would have, among other things:

1. amended the Ag Damage statute to allow take of wolves by private citizens under certain circumstances
2. established a compensation/proactive non-lethal fund.

The OCA argued then that folks should be allowed to take wolves under extremely broad circumstances and that they would accept nothing less. They succeeded in killing passage of the very legislation that would have helped them.

Allowing the language OCA wants to introduce to the Wolf Plan would not only take management decisions out of the hands of biologists and wildlife managers, but it would make it next to impossible to enforce poaching laws.

In Idaho last year, where wolves are most numerous in the West, less than 1% of cattle losses were attributed to wolves. Livestock operators can adapt to the presence of wolves, as has been shown in the West and in northern Minnesota, where 3,000 wolves co-exist with cattle and sheep operations.

I earnestly urge the ODFW to:

* Keep wolf management in the hands of biologists and wildlife managers. Allowing individuals the license to kill wolves on their own initiative would lead to widespread and indiscriminate slaughter of our wolves, in many cases of wolves not involved in livestock predation.

* Establish a state fund to assist in providing non-lethal deterrents to wolf depredation including both
the necessary hardware and subsidies for the employment of range-riders, and to compensate ranchers for confirmed wolf depredations.

* Raise the breeding pair limit from 3 to 12 to ensure the survival of a healthy wolf population in Oregon.

Thank you,

Chris Psota
Re: Proposed Changes to the Wolf Conservation and Management Plan

May 22, 2010

Dear Commissioners,

An escalating yet ultimately misplaced hysteria against wolves in northeast Oregon has now put more than half of Oregon's wolves in danger of extermination.

A misleading media campaign by the Oregon Cattlemen's Association (OCA) is aimed at exterminating the Imnaha pack near Joseph, OR. This pack of 10 accounts for more than half of Oregon's known wolf population of 14.

Ranchers claim that many calves have been killed, yet there has been only ONE (1) confirmed case of depredation out of a county-wide cattle population of 36,500.

In protecting their livestock, many northeast Oregon ranchers have not taken proactive, non-lethal measures, such as the use of fladry, range riders, or burying dead cattle deep enough so as not to attract wolves. Equipment and help to pay for these and other measures are available from Defenders of Wildlife and the ODFW. Defenders of Wildlife also compensates ranchers all their wolf-confirmed losses at market prices.

In addition, in 2005 and 2007 the OCA was responsible for blocking passage of the legislation called for in the Oregon Wolf Plan that would have, among other things:

1. Amended the Agricultural Damage statute to allow the takings of wolves by private citizens under certain circumstances
2. Established a compensation/proactive non-lethal fund.

The OCA then argued that virtually anyone should be allowed to take wolves and under extremely broad circumstances. It would accept nothing less, so it did not receive that.

In other words, the OCA actually succeeded in killing passage of the very legislation that would have helped them.

Allowing the language OCA currently wants to introduce into the Oregon Wolf
Conservation and Management Plan would not only take management decisions out of the hands of biologists and wildlife managers, but it also make it nearly impossible to enforce poaching laws.

Livestock operators can adapt to the presence of wolves, as has been shown in the West, including northern Minnesota, where 3,000 wolves co-exist with cattle and sheep operations. In Idaho last year, where wolves are most numerous in the West, less than 1% of cattle losses were attributed to wolves.

I strongly urge the ODFW to:

* **Keep wolf management in the hands of biologists and wildlife managers.** To allow individuals the license to kill wolves on their own initiative would lead to widespread and indiscriminate slaughter of our wolves, in many cases of wolves not involved in livestock predation.

* **Immediately establish a state fund to assist in providing non-lethal deterrents to wolf depredation,** including both necessary hardware and subsidies for the employment of range-riders, and to compensate ranchers for confirmed wolf depredations.

* **Raise the breeding pair limit from 3 to 12** to ensure the survival of a healthy wolf population in Oregon.

Thank you for your consideration.

William Hofford
Dear Commissioners:

The constant and escalating hysteria against wolves in NE Oregon has put more than half of Oregon's wolves in danger of being exterminated.

This relentless and dishonest media campaign by the Oregon Cattlemens' Assoc. is aimed at exterminating the Imnaha pack near Joseph. This pack of 10 accounts for more than half of our known wolf population of 14. Ranchers are claiming many calves killed despite only ONE confirmed case of depredation from a population of 36,500 cattle county-wide.

Many NE Oregon ranchers have taken no proactive non-lethal measures to protect their livestock, such as the use of fladry, range riders, or burying their dead animals deep enough so as not to attract wolves.

Equipment and help to pay for these measures and others are available from Defenders of Wildlife and the ODFW. Defenders compensates all confirmed losses at market prices.

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1. amended the Ag Damage statute to allow take of wolves by private citizens under certain circumstances

2. established a compensation/proactive non-lethal fund.

The OCA argued then that folks should be allowed to take wolves under extremely broad circumstances and that they would accept nothing less. They succeeded in killing passage of the very legislation that would have helped them.

Allowing the language OCA wants to introduce to the Wolf Plan would not only take management decisions out of the hands of biologists and wildlife managers, but it would make it next to impossible to enforce poaching laws.

In Idaho last year, where wolves are most numerous in the West, less than 1% of cattle losses were attributed to wolves. Livestock operators can adapt to the presence of wolves, as has been shown in the West and in northern Minnesota, where 3,000 wolves co-exist with cattle and sheep operations.

I earnestly urge the ODFW to:

* Keep wolf management in the hands of biologists and wildlife managers. Allowing individuals the license to kill wolves on their own initiative would lead to widespread and indiscriminate slaughter of our wolves, in many cases of wolves not involved in livestock predation.

* Establish a state fund to assist in providing non-lethal deterrents to wolf depredation including both the necessary hardware and subsidies for the employment of range-riders, and to compensate ranchers for confirmed wolf depredations.

* Raise the breeding pair limit from 3 to 12 to ensure the survival of a healthy wolf population in Oregon.

Thank you,

Dr. Tania Neubauer
Portland, OR
STOP THE AERIAL GUNNERS THAT ARE KILLING WOLVES VIA THE AIR!!!!!!!!!!!!!!!
THIS IS THE ONLY CONFIRMED REPRODUCING PACK IN OREGON!

Subject: Wolf Plan Needs Reform

Please bolster protection for wolves in Oregon through three primary measures:

Require the removal or destruction (i.e., rendering inedible) of the carcasses of non-wolf-killed livestock so that wolves are not attracted to areas with vulnerable stock.

Eliminate the authorization for killing wolves not caught in the act of attacking livestock.

Raise the bar for consideration of taking wolves off the Oregon endangered species list, from the unsupportable number of four breeding pairs to a number reflecting the needed distribution within and outside the state to ensure Oregon’s wolves’ connectivity to wolves elsewhere and the wolves’ genetic health.

The 2005 wolf plan is remiss in not requiring disposal of livestock carcasses. Far better to prevent conflict than to scapegoat wolves once they become habituated to domestic animals.

Allowing continued wolf “control” by federal hunters and trappers will forever prove a disincentive to truly seeking to prevent wolf/livestock conflict. It is also likely to prevent establishment of a viable wolf population in Oregon -- particularly as the state of Idaho
proceeds to reduce its wolf numbers.

Scientists recognize that hundreds, if not thousands, of breeding animals are necessary to ensure long-term genetic health. Four breeding pairs is setting the bar way too low to consider state delisting.

Noelle
The announcement about the Wolf Plan Evaluation is on our wolf Web site. We have passed your comments to the wolf plan reviewers. Thank you, ODFW Info

http://www.dfw.state.or.us/wolves/

**Wolf Plan Evaluation:** The Wolf Plan is due for its five-year review this year (2010). ODFW is working closely with stakeholders for their input and taking public comments on the plan’s effectiveness. To comment, please send an email to ODFW.Comments@state.or.us. Comments received by June 30, 2010 will be considered for the draft evaluation, which will include any recommended changes to the plan. The draft evaluation should be available for preliminary review by the public in August. ODFW will present the results of the evaluation and any recommendations to amend the plan to the Fish and Wildlife Commission at their Oct. 1 meeting in Bend.

I cannot believe that there are only fourteen (14) adult wolves alive in the entire state! I didn't even know there was a public comment period or what bill or ruling it pertains to exactly. Please record my comment on the importance of wolves as a species of beings we know little about and who deserve to live on Earth with us. I cannot support murdering wolves in any way, regardless of their predator status. That is their natural niche, and they have obviously been severely over-hunted. Your website didn't even have any clear announcement of your public comment period. Why not? How is the public supposed to know to get involved?

* * * * * * *

6/25/2010
June 24, 2010

To: Oregon Department of Fish and Wildlife
Re: Oregon Wild Comments on Oregon Wolf Conservation & Management Plan 5-year Review

Dear Commission Members,

Please accept the following comments from Oregon Wild concerning the 5-year review of the Oregon Wolf Conservation & Management Plan. Oregon Wild represents over 7,000 members and supporters who share our mission to protect and restore Oregon’s wildlands, wildlife, and water as an enduring legacy. Oregon Wild was founded in 1974 by a coalition of hunters and conservationists. Our goal is to ensure sustainable populations of all native wildlife. We emphasize the need for the protection of species whose populations are threatened or unnaturally low by protecting habitat and advocating for science-based management designed to recover populations to meaningful and sustainable numbers.

Wolves, like elk, salmon, eagles, and meadowlarks are native to Oregon. However, unlike most native species, wolves stir up strong emotions in both their admirers and detractors. It was fear of wolves and a frontier mentality that led to a government-sponsored program of extermination for wolves and other predators. That program finally succeeded in eliminating wolves from the state of Oregon – and most of the rest of the lower 48 United States - by 1946.

Over time, attitudes changed. Society no longer found it acceptable to purposely or passively eliminate native species. In 1973 wolves were listed as a federally endangered species. The goal of any endangered species listing is to recover populations and the habitat on which they depend over a significant portion of their range so that the species can continue living in perpetuity without the need for continued active human intervention. The best available science should guide management decisions toward that goal.

In 1998 after a half-century long absence, wolves returned to Oregon from Idaho where several populations of wolves (wolves that naturally dispersed from Northwest Montana, the reintroduced population from Yellowstone, and other unknown populations that may never have been extirpated) had interbred. That wolf was quickly, and perhaps illegally, returned to Idaho. Unfortunately, violent anti-wolf sentiment, misinformation, and fear of predators remain among some segments of the human population and the next wolves to return to Oregon fell to the bullets of poachers and were hit by cars.

In 2005, in response to public concern and after an exhaustive public process that involved representation from significant stakeholder groups, Oregon wisely finalized a wolf plan. The plan was a social and political compromise among the groups. It came of great compromise from all sides – especially from the conservation community. Despite, or perhaps because, of those compromises some have opposed implementation and finalization of the plan since its inception. Many of the same interests responsible for the extermination of wolves in the first place seem intent upon a repeat of history and have also fought to undermine and weaken the plan - and their credibility - with legislation and changes to relevant Oregon Administrative Rules.

Despite our concerns that the plan was incomplete, poorly funded, not entirely scientifically defensible, and had serious shortcomings, Oregon Wild and many other conservation groups honored the compromise. Despite our reservations, we have vehemently defended the plan, the process, ODFW, and ODFW personnel.
In 2008, Oregon confirmed its first wolf pups in over 60 years. Within days, Washington confirmed the same. The wolves that have begun to establish themselves in Washington have now been shown to be dispersers from coastal wolves in British Columbia. This has set the stage for the Pacific Northwest to be a particularly important region where intermixing and connectivity between different populations of wolves can occur. Though the wolf populations in Washington, British Columbia, Montana, and the wolves reintroduced into Yellowstone are all the same species and live in a contiguous range that once included Oregon, the connectivity between different populations is important to the meaningful long-term viability of the wolf population on the regional scale.

Most Oregonians welcomed the news of wolves breeding in Oregon. However, others continued to fight against the wolf plan and wolf recovery despite the fact that wolves had been in Oregon for over 10 years without any livestock depredations. Oregonians and the livestock industry had years to prepare for the return of wolf populations and the conflict that might follow. By not doing so, a critical opportunity was lost. Though some made appropriate changes, many resisted. Animal husbandry practices that had never been adapted to coexisting with native predators remained. In the spring of 2009, after being present for over a decade, the first confirmed predation of livestock by wolves occurred by a pair of young wolves in Northeastern Oregon. These young-inexperienced wolves were likely drawn to penned sheep by the presence of a 2-acre carcass pit, and unguarded prey. ODFW worked with the effected rancher to eliminate the attractants and first responded by attempting non-lethal methods to deter the wolves. Those efforts succeeded during the summer.

That same summer, western wolves (including the entire known population in Oregon) were stripped of their protections as a federally listed endangered species. The legality of that decision is being challenged in federal court. While interested parties await a decision in that case, management of wolves falls to individual states. As Montana and Idaho planned wolf hunts designed to test the feasibility of managing wolves by sport hunt with the stated goal of ultimately dramatically reducing numbers, Washington began developing what appears to be a much more protective wolf plan, and Oregon was being given its first test.

That test led to an unfortunate, but relatively non-controversial result. Non-lethal control measures worked on the pair of wolves during the summer. However, they returned to kill livestock in the fall. A kill order was issued, and Wildlife Services (formerly Animal Damage Control) killed both wolves.

Despite being saddened by the serious blow to wolf recovery, Oregon Wild and other conservationists continued to stand by the plan designed specifically to reduce conflict and inform a rational decision-making process when conflict occurred. Meanwhile, the Oregon Farm Bureau, Oregon Cattlemen’s Association, and others hostile to wolf recovery attempted to pass legislation giving private citizens the right to take management decisions for endangered wolves into their own hands. They proposed language allowing private citizens to “take” a wolf at any time without a permit if the wolf is chasing or harassing domestic animals, and make the unverifiable determinations themselves. This legislation would have made poaching laws virtually impossible to enforce.

Earlier this year, at the outset of the mandated 5-year review of the Oregon Wolf Conservation & Management Plan Oregon Wild again testified in defense of the plan, full funding, and enabling ODFW wildlife managers and biologists to do their jobs. We expressed our relief that the plan was to be reviewed and not rewritten. However, we expressed our concern that Oregon’s wolf population was small and their recovery precarious. Furthermore, we did not shy away from the fact that the plan was relatively untested, contained very real flaws, and that the potential existed for unnecessary and unhelpful histrionics.

A representative from The Oregon Cattlemen’s Association also testified and expressed their continued disdain for the wolves, the Oregon Wolf plan, ODFW, sound science, and the review process itself.
At that time ODFW had a confirmed wolf population of 14 wolves in two packs, and ODFW’s plan was relatively untested.

Since that time, we have seen the wolf plan implemented during a time of conflict – much of it whipped up by the usual suspects. We believe that the wolf plan and relevant OAR’s have been violated - certainly in spirit if not by the letter. ODFW has bent to the pressure brought by rabid anti-wolf interests who have demonstrated little credibility and no interest in meaningful collaboration or the conflict-free recovery of a species they themselves once pushed to the brink of extinction.

Our comments now must necessarily reflect our disappointment with the events of the last few months and address both the implementation of the plan as well as the language of the plan itself.

1) Funding
As with all non-game wildlife programs, the wolf program is woefully underfunded. This problem has been aggravated by a persistent national recession and particularly bad economic climate in Oregon. Funding for non-game wildlife generally and wolf programs specifically are not commensurate with the value of non-game species or their associated economic impact. Lack of funding for the program is an underlying cause of many of the plans weaknesses - both theoretical and as seen in implementation. If Oregon’s wolf population grows in number and expands in range while human passions continue to mount, these problems will only continue to worsen. ODFW must increase funding to the wolf plan by:
- Aggressively pursuing potential funding mechanisms including federal grants and appropriations, state appropriations, and initiative petitions,
- Prioritizing funding for wolves and species whose existence in the state is threatened over those that are abundant and non-controversial.
- Actively seeking creative sources of funding including but not limited to a wolf license plate, user fees from stakeholders with an emphasis on those who profit from and utilize public land and benefit from wildlife management such as the livestock industry, the renewal of a tax check-off, and other sources.

2) Appropriations
Budgeting should recognize and account for the likely increase in need that will come if wolf populations grow and conflict continues to increase. There is no line item cost identified for non-lethal control assistance to parties most likely to have conflict with wolves.

3) Relocation
Relocation language within the wolf plan is far too restrictive. The focus of conflict management should be non-lethal control. As a complicated endangered species with many human antagonists, relocation may provide a simpler, more appropriate, and more economical tool than many other management options.

With an understanding that relocation of wolves is not a cure-all and may be problematic under some circumstances, wildlife managers should have an exhaustive list of non-lethal options to turn to before lethal control that includes relocation. The liberalization of relocation language should not be written so as to obligate wildlife managers to utilize this particular option. However, the current language restricting relocation of wolves to the nearest Wilderness in some cases literally means moving them up a hill and is of little practical help. Especially while wolf populations are low, many of the problems identified with relocation are not problems at all. Though often disconnected by wide swaths of private land, grazing allotments, and other potential conflict areas, Oregon still has a significant pool of unoccupied high-quality wolf habitat.
4) Compensation Program

The loss of pets and livestock to wildlife is a risk taken by rural and urban folks alike. The number of domestic animals lost to predators is dwarfed by those lost to weather, disease, human thieves and any number of other causes. Some scientists have postulated that an increase in wolves may actually reduce the presence of mesopredators like coyotes which take a much greater toll on domestic animals than wolves. All of that of course is of little consolation to the individual affected by a wolf depredation or the viewer of a grizzly picture of a wolf killed lamb.

As a gesture of good faith and an acknowledgement that depredations on livestock would occur, conservationists supported an appropriate compensation program to reimburse livestock and pet owners who lose animals to wolves. Surprisingly, this effort was actively and effectively opposed by the Oregon Cattlemen’s Association and others.

We continue to believe that while science-based management with an end-goal of sustainable wolf recovery should guide management decisions, an appropriate compensation program could go a long way in further assuaging the socio-economic concerns of those most likely to be negatively effected by wolves.

It’s worth noting that a flawed compensation program could be more problematic than no program at all. Some compensation programs have in fact provided incentive for poor husbandry. By actively or passively enticing wolf depredations, some individuals reap unfair financial rewards and see it as an opportunity for “bad p.r.” for wolves.

We urge ODFW to include and advocate for a compensation program that would:
- only compensate domestic animal owners who have taken well-defined and comprehensive steps towards preventing depredations
- only compensate for depredations that occur on private lands and are clearly caused by wolves as determined by a wildlife professional trained in making such determinations and following a rigorous, standardized, well-documented, and public process
- be funded by a separate source and not raid or come at the expense of funds designated for non-lethal measures or already underfunded non-game wildlife or wolf programs
- distribute funds on an annual basis and divided amongst claimants instead of on a “first come first serve basis”
- in the case of livestock being raised for human consumption, pay fair market value for animals at the time of their depredation not based upon a theoretical fair market value for an adult animal in full health.

5) Animal husbandry program

There exists a steep learning curve for individuals in the livestock industry in coexisting with wolves. Prior to 1946, dealing with conflict was uncomplicated and meant simply killing wolves. This of course led to several generations in which there were no wolves to deal with. Unfortunately, some in the livestock industry are actively resistant to learning and applying non-lethal methods of dealing with preventing conflict. Even so, ODFW should create, fully fund, and support a program to educate the owners of domestic animals in wolf country on methods to proactively prevent and manage conflict. Additionally, we would support a program designed to assist landowners in implementing those techniques. This and other non-lethal methods of conflict prevention and control should be considered paramount or at least co-equal to confirming wolf kills and lethal control of wolves, and must also take place on public lands. So far this has not occurred, and the problem has been exacerbated during times of conflict.

In Chapter 3, Section C, the wolf plan requires livestock owners to make “a good faith effort to achieve a non-lethal solution”, but not exhaust all non-lethal techniques. This should be changed, or at a minimum a “good faith effort” should be clearly and appropriately defined and require similar efforts of adjacent livestock owners.
6) Conflict on public vs. private land
Though the wolf plan makes references to different philosophies for conserving and managing wolves on public vs. private lands, it is an important distinction that should be clarified in how those differences will play out in implementation. Wildlife conservation and management is not undertaken simply to appease a single economic interest, but for the benefit of all Oregonians. Similarly, public lands are meant to be managed for all citizens, not just those who profit from or live in the closest proximity to them.

With the unlikely exception of a wolf acting aggressively towards humans, the very notion of a “problem wolf” on public lands is a false one. Even after depredation events on public lands, conservation and non-lethal hazing should take an even greater importance than on private land, and conditions on adjacent private land should be taken into account. The differences currently outlined in the plan are insufficient, often unclear, and poorly explained in relevant sections of the plan.

7) Depredation confirmations
Interested stakeholders in wolf management would surely prefer that the individuals or agencies designated to investigate wolf depredations be the ones most likely to make conclusions that lead to their preferred management objectives. Unreasonable anti-wolf interests would like a positive determination 100% of the time, and unreasonable pro-wolf activists would prefer the opposite. We believe positive determinations should be defensible as such and based upon clear, measurable, documented evidence.

The events of 2010 have demonstrated a clear need for the standardization and clarification of training for investigators, the process of investigation, and publication of results.

Involvement in investigations should be limited to the livestock owner or effected member of the public (not advocacy or trade groups to which they belong), and trained investigators who have undergone rigorous and standardized training. Law enforcement’s role should be limited to enforcing the law, protecting evidence, and ensuring a safe area for investigators to do their job. As with training, the process for making determinations should be standardized, rigorous and clear. Similarly, the procedure for making the results of investigations publicly available (regardless of determination) should be standardized. The evidence and conclusions should be well documented and readily available to concerned members of the public. But again, to emphasize, the public should not be involved in making the determination itself.

The events of 2010 also demonstrated that when wolf hysteria hits, ODFW can expect to be inundated with requests for investigation of livestock losses. Confirmation of depredations should not come at the expense of other requirements of the plan such as education, non-lethal control, and pursuit of funding.

A final lesson of 2010 is that - at this time - ODFW remains the most credible agency for determining wolf depredations. Wildlife Services (formerly Animal Damage Control) has discredited itself by dispatching its wolf hunter to make determination. Mr. Riggs has demonstrated himself to be unfit for this responsibility. In addition to making flagrantly flawed determinations, the agency has also helped fan the flames of conflict by enlisting untrained anti-wolf activists to help make and publicize their determinations. These activists have effectively used their involvement to claim credibility, politicize the process, and effectively make public attacks aimed at undermining the perception and credibility of ODFW.

8) Recovery Numbers
Recovery numbers (the number of wolves after which the species can be considered for delisting) represent one of the greatest compromises from conservationists of the wolf plan and one of its greatest flaws. Furthermore the plan’s relisting triggers are shockingly problematic. Recovery numbers may be politically or socially defensible within certain segments of society. However, they are not scientifically defensible.
Washington State is currently working to finalize their wolf plan. They set significantly higher recovery numbers, but that plan was unanimously blasted by a blind panel of scientists as being far too low. If that plan is laughable, Oregon’s is a crying shame. We are nearing recovery numbers for wolves in Oregon. With a population of 14 confirmed wolves (at the time of this writing, at least one is missing and feared dead, and Wildlife Services has a kill authorization for two more), to claim Oregon is close to having achieved recovery is a contradiction to the word conservation in the full title of the Oregon Wolf Conservation and Management Plan.

Triggers for relisting are a major cause of concern. Under the current plan if wolves fall below recovery numbers due to poaching or legal lethal control, wolves may not be relisted. Since the single greatest threat to wolves is human-caused mortality, this must be addressed. If wolves fall below the population number that allowed their delisting in the first place or experience a precipitous decline, they should be immediately relisted as a state endangered species until they again achieve recovery numbers.

Wolves are a wide-ranging social species with intricate behaviors and systems that we are only beginning to understand. Meaningful and sustainable recovery can not be achieved with a small, dispersed population constantly under threat. By prematurely resorting to killing wolves, killing the wrong wolves, disrupting pack structures, or creating habitat sinks, wildlife managers put wolf recovery in numerical jeopardy and may in fact create more problems and conflict than they solve.

Minimum wolf numbers should be guided by the best available and most current science. If the numbers are different due to political or social reasons, the wolf plan should explain the reasoning. Ecosystems are able to achieve a dynamic equilibrium and while establishing a minimum number is prudent to ensuring recovery, the wolf plan was wise not to create cap numbers for wolves and that must not change in the foreseeable future.

9) Interagency roles, process, and communication
The roles, relationships, and communication between agencies and stakeholders have not been clearly defined. ODFW should address this problem in an appropriate manner that preserves the goals of the wolf plan and ensure appropriate science-based management.

10) Species Prioritization
All native wildlife should, at a minimum, be conserved to ensure sustainable populations not in need of perpetual human intervention. However, conservation efforts should be directed first and foremost towards those species – like wolves – that are endangered, under threat, at artificially low numbers, or controversial. Several parts of the plan – notably Chapter 4, Section C prioritizes species whose populations are not under threat or are even being held at artificially high numbers. Wolves and other predators can and will cause changes in behavior and population of other species. These impacts are just now beginning to be understood and current science indicates wolves and other predators play a beneficial role in maintaining healthy ecosystems. This is part of a natural process. Changes in populations of other species should not require lethal control of wolves unless 1) a decline occurs in a species that genuinely threatens its existence across a large range and 2) it can be proven that wolves are in fact a primary cause of said decline.

12) Review Process
While we are generally pleased with the process for the review of the wolf plan and grateful for public involvement, we believe the original stakeholder committee should be re-engaged in the process. Their insights into the process that created the plan, its implementation, proposed revisions, and other events are particularly valuable and should be taken into account. Doing so would not require a rewrite of the plan.
Though the majority of comments coming from the public may not have a mastery of the minutia of wolf management or provide clear suggestions for improvements to the plan, they demonstrate the clear and overwhelming desire for meaningful wolf recovery from the general public. Wolf management, like that of any other wildlife species effects and is not just for a subset of special interests most proximate to the population. Public comments should be considered in final decision and revisions.

14) General Suggestions

- Recognizing the plan is relatively weak, ODFW must stand up for science-based management of wolves (and other endangered species) that leads to a meaningful recovery. ODFW must actively defend against efforts to weaken the plan, legislation aimed at undercutting it, and schemes designed to reduce the agency’s role in achieving that goal.

- ODFW must unequivocally reaffirm its position that the ultimate goal of the wolf plan is conservation of the species and a sustainable recovery of the species. As long as wolves are listed, actions taken to reduce conflict must be unambiguously in-line with that goal and prioritize non-lethal management when conflict occurs.

- Resources are limited and inadequate. Funds must be found to address this problem. Even, and especially, when conflict occurs, non-lethal control, conflict prevention, education, and public outreach and other parts of the plan should be considered paramount or at least co-equal with lethal control and confirmation of wolf kills. These latter activities must not come at the expense of the former. This should be spelled-out in the wolf plan.

- Considering the very recent violent past of anti-wolf interests, the current passion of those forces, and the vulnerability of the current wolf population, ODFW should be very careful about what and with whom information is shared about the information given regarding the location of wolves. For specific suggestions of changes we would like to see enumerated, please see the letter that was submitted to ODFW by Oregon Wild & Hells Canyon Preservation Council on May 24th, 2010.

- Sound science must be vigorously defended against persistent and purposely promulgated wolf myths designed to stir up controversy. ODFW must enthusiastically rebut false claims including but not limited to those that claim wolves are a non-native species, spread new diseases, decimate game herds across the landscape, and exaggerate the threat to humans and the livestock industry. ODFW has credibility on the issue. Allowing such myths to go unchallenged or not put into context only continues to fuel the fire of passionate stakeholders and jeopardize wolf recovery.

- In recognizing legitimate science, the ability of individuals, organizations, and stakeholder groups to participate in the process determining wolf management should be in direct proportion to their credibility on the subject. Those that continue to be uncooperative, knowingly reference bogus science, or demonize wildlife should not be part of the discussion or meaningful collaboration.

- Though the wolf plan rhetorically recognizes the public value of wolves on the landscape, including their existence value, ODFW must clearly define that wolf conservation and management specifically, and wildlife management generally is for the public good, not for any particular stakeholder group. Conservationists, hunters, photographers, ranchers, wildlife lovers, disabled citizens, and extreme hikers are all equal stakeholders regardless of their zip code.

- Sections including Chapter 5, Section D – addressing the role of wolves and trophic cascades should be updated to incorporate the most recent best available science.

- Wolves have a complex social structure. Lethal take – whether through a sport hunt, agency action, or illegal action – has the potential to disrupt that structure and create the conditions for increased depredations and conflict. Through all phases of the plan, and even after de-listing, lethal take should be an option of last resort and precisely focus on individual wolves causing conflict.

- To remake the point, legitimate science aimed at achieving a goal of ecosystem health, integrity, sustainability and long-term meaningful recovery of endangered species should guide the review process and the implementation of the plan. Where the plan differs from that in theory or implementation due to political, social, or legal compromise, ODFW should acknowledge such.
15) Parts of the plan that should not be changed include:

- ODFW must continue to be the final decider of depredations.
- Any cost-benefit analysis must consider ecosystem services, existence values, and other benefits (realized and potential) of wolves, and not just the costs of management or marginal negative costs.
- ODFW must not ever arbitrarily cap wolf numbers or include wolf exclusion zones (or do so to address political or social pressure).
- Non-lethal and preventative measures as well as public education and communication must continue to be emphasized, exhausted, and documented (a good-faith effort should be defined as such) before lethal measures are taken. This must be adhered to in implementation.
- Harassment and lethal-take permitees should be educated and assisted in non-lethal preventative measures and their performance should be monitored to inform future issuance of permits.
- Lethal control measures must not take place when unreasonable circumstances – such as carcass piles and poor animal husbandry – exist that invite conflict.
- Lethal take by private citizens should only be permitted in cases of demonstrable self defense or for wolves caught in the act of attacking – not testing, scavenging, harassing, chasing, or other suspicious behavior or for proximity to structures. Changing this part of the plan would make poaching laws nearly impossible to enforce and allow private citizens to take management decisions into their own hands.
- Preventative and non-lethal measures may overlap, but are and should continue to be defined differently.
- The exclusion of any “no-wolf” zones should continue.
- While it may be appropriate to make some clearly defined and defensible adjustments, adjacency language must not be eliminated. The restrictive language was put in place intentionally and for very good reason. If adjustments are made, the language must still be restricted so as to ensure any control actions are in fact targeted towards the wolf or wolves responsible for the need for such action. Such a change should be done with the consultation of the original stakeholder committee and all current reasonable stakeholders and
- Recovery goals should not be reduced and must not be statewide. Suitable habitat in Western and Eastern Oregon are separated by significant swaths of marginal habitat. Combining the two could delay delisting in Eastern Oregon or do so prematurely in Western Oregon.

Thank you for considering these comments. We look forward to working constructively with you in reviewing the wolf plan and ensuring it is properly implemented.

Very Sincerely

Rob Klavins,
Advocate, Oregon Wild

Cc: Ron Anglin, ODFW
    Craig Ely, ODFW
    Russ Morgan, ODFW
    Michelle Dennehy, ODFW
    Mike Carrier, Governors office
    Representative Brian Clem
    Senator Jackie Dingfelder
June 24, 2010

**Summary of Oregon Wild’s Comments on the 5-year Review of the Oregon Wolf Conservation & Management Plan**

Oregon Wild represents over 7,000 members and supporters who share in our 35-year mission to protect and restore Oregon’s wildlands, wildlife, and waters as an enduring legacy for future generations. As part of that mission we seek to ensure sustainable populations of all native wildlife including wolves.

Wolves have experienced a violent history that continues into present times. Wolves were extirpated from the state in 1946 and over the last 12 years have begun to make tenuous steps towards recovery. Oregon currently has 14 confirmed wolves and they continue to conjure up strong emotions on both sides. As an endangered native species, management of wolves should focus on science-based management that will lead to a sustainable population.

Anticipating the return of wolves, in 2005 Oregon wisely called together stakeholders to produce a wolf plan to ensure recovery of the species and guide decisions before conflict occurred. The plan was better than those of neighboring states at the time, but represented a social and political compromise more than a science-based plan. Despite our reservations, Oregon Wild and other conservationists have continued to honor the compromise by defending the plan, the process, ODFW, and ODFW personnel. Last year the plan led to the death of two young Oregon wolves.

State wildlife management should be implemented for the benefit of all Oregonians, not just those most proximate to species being managed or reaping financial profit from that management. Some special interests hostile to wolf recovery, wildlife, and government authority have chosen not to be constructive and have actively worked to oppose, undermine, and sabotage, the plan, ODFW, and wolf recovery. As the plan has been implemented this year, ODFW has seemed to bend to these pressures and our comments necessarily reflect our disappointment with the events of the last few months and address both the implementation as well as the plan itself.

**Funding:** Non-game wildlife programs and the wolf program in particular are woefully underfunded. A bad economy, the potential for an expanding wolf population, and increasing controversy make this problem worse. ODFW must work aggressively and creatively to secure funding for implementation of all aspects of the wolf plan and begin to prioritize endangered species protection and recovery.

**Appropriations:** Budgeting should prioritize non-lethal control and conflict prevention.

**Relocation:** Wolf relocation is not a cure-all for wolf conflict and can be inappropriate for many situations. However, in some cases it may be a simpler, cost-effective, and more appropriate tool than other options and wildlife managers should have available to them an exhaustive list of non-lethal options to turn to before resorting to lethal control. Relocation should not be required, but be an available option. As it is, relocation language is so restrictive as to make it of little practical help.
**Compensation:** As a gesture of good faith and an acknowledgement that wolves have the potential to create limited but real economic hardship on a small number of stakeholders, Oregon Wild supported an appropriate compensation program. We have been frustrated that stubborn special interests with the most to gain from such a program have actively opposed its enactment. We continue to support an appropriate program. However, a flawed compensation program could be more problematic than no program at all by creating incentives for bad animal husbandry that lead to continued conflict and decreased resources. In our attached comments we outline some important components of such a plan.

**Animal husbandry:** Living near the big wild places of the west means living with wildlife. Exterminating native species is no longer an acceptable way of dealing with potential conflict. Coexisting with predators takes work and requires new techniques for those living near wolves. Programs to educate owners of domestic animals about ways to prevent conflict and deal with it without resorting to bullets need to be funded and implemented across the landscape and be considered a top-tier priority of the wolf conservation plan. Furthermore, efforts required by the agency and citizens are not clearly or appropriately defined.

**Public vs. private land:** Public lands are to be managed for the public good, not just for those citizens who profit from or live closest to them. With the unlikely exception of an animal behaving aggressively towards humans, the idea of a “problem animal” of any native species on public lands is a false one. Prevention, avoidance, conservation, and non-lethal hazing on public land should take on even greater importance than on private lands – even after a depredation. These differences are not clearly laid out in the plan.

**Depredation:** The process of investigating depredations has been a source of great conflict in 2010. Wildlife Services (formerly Animal Damage Control) has demonstrated itself to be at best a discredited and unhelpful partner, and at worst willfully negligent in determining depredations. At the moment, as the most credible and unbiased participant, ODFW must remain the final authority on the matter. The wolf plan must standardize and clarify the training of investigators, the process of investigations, and the documentation and publication of all results. Until that is done, unreasonable special interest will continue to use the process to undermine ODFW and sound, science-based wildlife management. Finally, confirmation of depredations must not come at the expense of conflict prevention.

**Recovery numbers:** In ensuring long term recovery for an endangered species facing vocal and violent opposition, ODFW was wise to set a minimum number of wolves and not a population cap. Still, recovery numbers represent one of the greatest compromises from conservationists. The numbers are far too low to be scientifically defensible and instead represent a social and political compromise. Additionally the process for relisting wolves is frighteningly and fundamentally flawed. Even if wolf numbers precipitously decline due to a return to rampant poaching or mismanagement, there is no mechanism requiring protections be reinstated.

**Interagency coordination:** Interagency coordination has been the cause of serious problems and needs to be addressed to ensure appropriate management.
Species prioritization: All native wildlife should, at a minimum, be conserved to ensure sustainable populations that do not need continual human interference. Conservation efforts and resources should be directed first and foremost towards those species – like wolves – that are endangered, under threat, at artificially low numbers, or controversial. In some cases the wolf management plan flips this priority on its head and instead prioritizes limited resources towards abundant non-controversial species whose populations may in fact be artificially inflated. Wolves are a complex, wide-ranging species that are a part of the Oregon landscape. Their presence will effect changes in other native species that may be more valued by some stakeholders. However, ecological integrity should take precedence and changes in population of other species should not require lethal control unless 1) a decline occurs in a species such that its existence is threatened across a large area and 2) it can be proven wolves are in fact a primary cause of said decline.

Process: We are generally pleased with the process for review of the wolf plan. The process should be a review that strengthens the wolf plan, and is not a major revision or rewrite. We encourage ODFW to re-engage the original stakeholder committee and fully consider public comments.

Generally:
- ODFW must stand up for science-based management of wolves and actively defend the plan and wolf recovery.
- ODFW must prioritize efforts aimed at prevention of conflict under all circumstances.
- ODFW must be more cautious in sharing information about the precise location of wolves with a public that contains individuals violently opposed to wolf recovery.
- The ability of organizations to participate in management decisions and collaboration should be directly proportional to their credibility on the subject. Those who continue to be uncooperative, knowingly reference bogus science, or demonize wildlife should not be a part of the process.
- The wolf plan must recognize the value of wolves and the equal standing of all reasonable stakeholders based upon their credibility, not upon their zip code, occupation, or recreational interests.
- Wolves have a complex social structure. In attempting to reduce depredations and conflict, lethal take can often be counterproductive. Through all phases of the plan and even after delisting, lethal take should be an option of last resort and precisely focuses on individual wolves causing conflict.
- ODFW must unflinchingly recognize, incorporate, and defend the best available science and vigorously defend it against persistent and purposefully promulgated myths. Not doing so only invites further conflict and jeopardizes wolf recovery.
**Parts of the plan that should not be changed include:**

- Wildlife Service has demonstrated a total lack of credibility bordering on willful negligence in investigating wolf depredations. At this time, ODFW must continue to be the final decider in determinations.
- Any cost-benefit analysis should be just that, and consider benefits of the species
- ODFW must not cap wolf numbers or include wolf exclusion zones
- Non-lethal & preventative measures including public education must be given top priority in implementation of the plan
- Lethal control measures must not take place when unreasonable circumstances exist that invite conflict
- Lethal take by private citizens should only be permitted in cases of demonstrable self-defense or for wolves caught in the act of attacking domestic animals – not testing, scavenging, harassing, chasing, or other suspicious behavior or due to proximity to structures. Management decisions should be left in the hands of wildlife managers and guided by sound science aimed at sustainable recovery.
- Recovery goals must not be reduced or consolidated to a statewide number.
- Adjacency language *must not* be eliminated. Clearly defined and defensible adjustments *may* be appropriate. However, the restrictive language was put in place intentionally and for very good reason. Any changes should include consultation with reasonable stakeholders and must ensure control actions are targeted towards the wolf or wolves responsible for the need for such action.

The elimination of wolves from Oregon is one of our greatest environmental tragedies, and their recovery has the potential to be one of our greatest success stories. Most Oregonians would welcome the sound of a howling wolf as they stoked a campfire during a rafting trip on the Rogue River. Furthermore, we are just now beginning to learn about the critical role wolves and other predators play in maintaining the healthy ecosystems that benefit all Oregonians.

Still, some radical anti-wildlife voices with no interest in meaningful wolf recovery continue to whip up misinformed hysteria that threatens wolf recovery. We hope ODFW will consider our comments, make appropriate changes to the wolf plan, continue to work with reasonable stakeholders, appropriately implement the plan, and work to ensure the recovery of this still very endangered species by following science-based management. Please review our attached comments for full details.

Very Sincerely,

Robert Klavins  
Roadless Wildlands, Advocate
Oregon Department of Fish and Wildlife  
3406 Cherry Avenue N.E.  
Salem, OR  97303-4924

Subject:  Wolf Plan Needs Reform

Dear Sir or Madam,

Please bolster protection for wolves in Oregon through three primary measures:

1. Require the removal or destruction (i.e., rendering inedible) of the carcasses of non-wolf-killed livestock so that wolves are not attracted to areas with vulnerable stock;
2. Eliminate the authorization for killing wolves not caught in the act of attacking livestock;
3. Raise the bar for consideration of taking wolves off the Oregon endangered species list, from the unsupportable number of four breeding pairs to a number reflecting the needed distribution within and outside the state to ensure Oregon's wolves' connectivity to wolves elsewhere and the wolves' genetic health.

The 2005 wolf plan is remiss in not requiring disposal of livestock carcasses. It is far better to prevent conflict than to scapegoat wolves once they become habituated to domestic animals.

Allowing continued wolf "control" by federal hunters and trappers will forever prove a disincentive to truly seeking to prevent wolf/livestock conflict. It is also likely to prevent establishment of a viable wolf population in Oregon—particularly as the state of Idaho proceeds to reduce its wolf numbers.

Scientists recognize that hundreds, if not thousands, of breeding animals are necessary to ensure long-term genetic health. Four breeding pairs is setting the bar way too low to consider state delisting.

Thank you for your consideration.

Respectfully,

Scott Heinze

RECEIVED
JUN 28 2010
WILDLIFE DIVISION
June 29, 2010

Oregon Department of Fish and Wildlife
3406 Cherry Avenue NE
Salem, Oregon  97303

Re: Comments on Oregon Wolf Conservation & Management Plan 5-year Review

Dear Commission Members:

I am writing to you as a citizen of Northeast Oregon and a lover of natural environments to share my opinion on the Oregon Wolf Management Plan.

Oregon has one confirmed breeding pair of wolves in the state, with other packs suspected but not yet confirmed. As I write, the location of the Alpha Male of the Imnaha Pack is unknown. While this hopefully is due to a malfunctioning tracking collar, he could well be victim of the “shoot, shovel, and shut-up” threats of members of the Oregon Cattlemen’s Association. Representatives of this organization in Oregon and similar groups in other areas of the west have been very vocal in their disregard for the law and their willingness to operate outside the law to fulfill their demands of wolf removal. The documented killing of wolves in the areas around Ukiah and Elgin illustrate this behavior.

Clearly the depredation of young livestock on private land in NE Oregon is problematic for affected ranchers. Unfortunately, however, some of those ranchers and their neighbors have dug in their heals and are expecting the state to turn on their demands. They and their neighbors have been unwilling to take necessary simple steps to safeguard their herds and flocks and are expecting to do business as usual. This is an unreasonable and unrealistic demand.

Following in no special order are points I ask you to consider as you read through the comments coming your way on wolf management:

- It is key for science, not hysteria and bigotry, to drive decisions made concerning wildlife issues.
- Emerging science has shown the vital role top predators play in the restoration and maintenance of healthy ecosystems. Where top predators are in residence, ungulate herds alter their grazing habits and no longer mow riparian areas to the nub, allowing vegetation along streambanks to
reestablish with the cascading effect of lowering water temperature for healthy fish populations to return, as well as songbirds, beaver, reptiles, amphibians, and other missing natural residents.

- It is known carcass piles attract wolves, yet many Wallowa County ranchers stubbornly refuse to adequately dispose of this attractant. Pressure must be put on ALL livestock producers to alter this behavior. No depredation compensation should be paid to any livestock producer who has even one dead animal rotting on their property, or on the property of adjacent landowners. While this may initially appear unfair to ranchers suffering depredation, it is the joint responsibility of all livestock producers to safeguard these herds and so peer pressure from their fellow ranchers must be put on those producers refusing to take these steps.

- The Oregon Wolf Plan must have clear, unambiguous steps to be followed in order for a take permit to be issued. These steps must be meticulously followed.

- Wildlife Services has a history of killing predators at the behest of the livestock industry. As such, Wildlife Services is clearly a poor choice for an agency to be charged with identifying wolf and other predation. Oregon Department of Fish and Wildlife has the staff, training and tools to maintain this responsibility. As such ODFW should be the agency responsible for predator management in the state of Oregon.

- Social scientists are just beginning to understand pack dynamics and the importance of maintaining those dynamics in wolf populations. Wolf packs are complex social units. Random taking of pack members upsets the family dynamics of the pack. When older wolves are killed, younger pack members with less developed hunting experience are more likely to seek out easier prey, such as livestock.

- The trigger number of wolves in Oregon in the current Wolf Plan is unrealistically low. The number of wolves in Oregon should not be the only yardstick to measure wolf recovery. Breeding pairs, opportunity for gene pool diversity and wildland connectivity are among other considerations needing to be measured.

- For years many livestock producers have been irresponsibly releasing their herds onto public lands with little oversight and in some admitted cases no records of their numbers. These same ranchers then claim losses due to predator depredation they cannot adequately document. Science has revealed the many challenges these producers face bringing a cow to market including death from preventable disease, weather, and domestic dogs. Calling every livestock death wolf predation is laughable.

- As a resident of rural Oregon and user of the backcountry, I am shocked and amazed at the number of unaccompanied livestock seen in wolf country. If these producers are so concerned about the viability of their herds, they should be taking steps to protect these animals.

- Livestock grazing has documented negative impacts on public lands on which these animals are released, including but not limited to the spread of noxious weeds, impacts on native grasses, damage to riparian health and the spread
of disease to native wildlife species in livestock allotments. It is unreasonable for livestock producers to expect to continue to devastate these wildlands running their herds on public lands. Perhaps it is time to rethink and regulate livestock access to public lands for the health of the resource, rather than subsidizing an unsustainable industry.

- Wolves are known for their predation on the old and weak in a herd. Their presence helps to strengthen the health of ungulate herds. Other species up and down the food chain benefit from the carcasses.
- Not only do healthy wolf populations have positive impacts on the geography in which they reside, they also are a huge draw to those citizens interested to hear the howl of the wild, and in very rare instances actually view a wolf and as such can be a financial resource to areas where wolves exist.

I call on you to be guided by science when determining any alterations to be made to the Oregon Wolf Plan and look forward to following this process to its completion.

Sincerely,

Juanette Cremin

cc: Senator David Nelson
900 Court St. NE, S-211
Salem, Oregon 97301
sen.davidnelson@state.or.us

Representative Greg Smith
900 Court St. NE, H-482
Salem, Oregon 97301
rep.gregsmith@state.or.us
June 30, 2010

Oregon Department of Fish and Wildlife
3406 Cherry Avenue NE
Salem, Oregon 97303

Attn: Wolf Plan Comments

Dear ODFW,

As you review Oregon’s Wolf Conservation and Management Plan, I urge you to consider implementing stronger protections for Oregon’s wolves.

I recently produced an award-winning film, Lords of Nature: Life in a Land of Great Predators www.lordsofnature.org, that reports on research out of OSU showing the ecological benefits of having top predators like wolves on the landscape. Dr. Bill Ripple’s and Dr. Bob Beschta’s research shows that where there is a healthy population of predators, the ecosystem is in much better shape: riparian trees such as cottonwood, willows and aspen flourish - and without these predators the ecosystems are less healthy. Populations of top predators also indicated much higher biodiversity - with the riparian forest flourishing, the animals that use that habitat- beavers, songbirds, butterflies, fish that benefit from the shade - flourish as well.

To help restore our public land ecosystems, rivers, and biodiversity, it’s important that Oregon restore the wolf population.

After being extirpated from the state, wolves are now an endangered species in Oregon. The objective of the wolf plan ought to be a sustainable recovery of this native predator. Meaningful recovery can only be achieved using science-based wildlife management. Management should aim to protect Oregon’s native species and ecosystems, not appease narrow special interests.

Wolf recovery numbers are far too low to ensure a meaningful and sustainable recovery. What’s more, the plan is severely underfunded.
In producing *Lords of Nature*, I interviewed two of the largest sheep ranchers in Idaho as well as cattle and sheep producers/farmers in Minnesota - where they live with the largest population of wolves in the lower 48 - 3,000 wolves. There are also 8500 farms with livestock in Minnesota wolf territory. We saw how people have learned, over time, to coexist with wolves by using nonlethal approaches to reducing wolf conflicts with livestock.

These livestock producers all told us, it takes time for the shift to happen - to learn to live with wolves, but it does happen - there's a learning curve, and we need to acknowledge in Oregon that we are at the beginning of that curve - and to succeed, we need leadership from the state and ODFW - to promote and teach proper behavior so that over time, we too, will learn how to live with wolves without the knee jerk reaction to kill them any time they are nearby or threaten our possessions or even kill some livestock.

As Mr. Raidaich, a cattle producer in NE Minnesota told me, "A farmer deals with nature every day he steps out of his house - we deal with the weather, we deal with the trees (encroaching on farmland) we deal with the wolves, they were here before us and we just learn to live with them."

So in implementing the plan, ODFW must emphasize the use of non-lethal tools to reduce and prevent conflicts including effective communication, education, and outreach. Lethal control should only be an option of last resort.

As the agency charged with managing Oregon’s wildlife for the benefit of all, I thank you for accepting my comments. Please redouble your efforts towards restoring balance to Oregon’s ecosystems by giving wolves the strong protections they need.

A *Lords of Nature* DVD is enclosed for your review.

Very Sincerely,

Karen Anspacher-Meyer
Executive Director
Christina A Schmidt

From: Heather Thomas  
Sent: Tuesday, July 06, 2010 9:37 AM  
To: Christina A Schmidt  
Subject: FW: Do NOT Permit Wolf Killing

From: Liz Dreith  
Sent: Tuesday, July 06, 2010 9:36 AM  
To: Michelle Tate; Heather Thomas; Russ Morgan  
Subject: FW: Do NOT Permit Wolf Killing

FYI.

From: stuart.phillips [mailto:stulips@hotmail.com]  
Sent: Friday, July 02, 2010 6:43 PM  
To: martin.nugent@state.or.us; odfw.info@state.or.us; liz.a.dreith@state.or.us; carol.d.turner@state.or.us  
Subject: Do NOT Permit Wolf Killing

I strongly support wolf recovery in Oregon. Do NOT kill or allow killing of any wolves in Oregon, ever, the livestock industry must take care of itself, not dump carcasses near animal, protect their livestock with common sense! Not attracting wolves or killing them, ever, this is unacceptable! Do NOT allow killing of any endangered wolves in Oregon, they are NOT a threat, ranchers must protect their livestock with common sense, bringing in their animals at night, fencing, dumping carcasses far away from living cows. Common sense tactics that save wolves.  stuart phillips, eugene, oregon

The New Busy think 9 to 5 is a cute idea. Combine multiple calendars with Hotmail. Get busy.
June 30, 2010

Oregon Department of Fish and Wildlife
Wildlife Division
3406 Cherry Avenue N.E.
Salem, OR 97303
Delivered via: ODFW.Comments@state.or.us

RE: Comments on Oregon’s Wolf Conservation and Management Plan

Dear Oregon Department of Fish and Wildlife:

Thank you for the opportunity to comment on the Oregon Wolf Conservation and Management Plan (December 2005; hereinafter “the Plan”). Please accept these remarks on behalf of Predator Defense as well as our members, most of whom are Oregon residents and all of whom have an interest in wolf recovery in Oregon.

Predator Defense understands that much hard work has gone into development and, more recently, implementation of the Plan, and we appreciate the challenges the state faces in balancing competing interests in those efforts. At the same time, we urge the Department to strengthen the Plan and submit the following suggestions.

1. **The Plan’s recovery and management goals should be based on science and restoring wolves’ ecological effectiveness.**

   The Plan calls for stripping wolves of state protections in each part of the state with establishment of four breeding pairs (and full management at seven breeding pairs). These numbers have no scientific basis. In fact, it’s common knowledge that these numbers resulted from a political compromise. The Department should engage independent biologists to help it determine how many wolves would be required for demographic and ecological recovery in Oregon. Wolves are apex predators and numerous studies have shown that they have significant impacts on the food web, with resulting benefits to ecosystems and ecosystem functioning (see Licht et al. 2010 for an exhaustive list of such studies).

   Wolves are native to the Oregon landscape. Before humans exterminated them, they regulated prey species and asserted influences upon vegetation and competing predator species. To truly restore wolves in Oregon, these influences should be present. Demographic considerations are always important, but for keystone species like wolves, ecological effectiveness should also be a recovery consideration (Estes et al. 2010; Bergstrom et al. 2009).
2. The Plan’s relocation provision should be modified.

According to the Plan, wolves involved in depredations can be relocated to nearest wilderness areas; however, much of these areas is not productive habitat for wolves or their prey. Language in the Plan should be changed to allow for relocations that may be appropriate to more distant locations. That said, relocations are not always appropriate and should not be considered the primary solution to conflicts. Predator Defense urges the Department to require livestock producers to take greater responsibility for protecting their stock.

3. The Plan’s language regarding livestock conflict investigations should be modified.

ODFW should clarify language in the plan pertaining to the process ranchers must follow in response to livestock conflicts. Currently, Plan language allows landowners to contact the Department or Wildlife Services. The Department should be the lead agency in charge of investigations, and conflict prevention and response – not USDA-Wildlife Services. Producers should be required to contact ODFW, and ODFW should then lead investigations. Anyone who is familiar with Wildlife Services and the rural West knows that Wildlife Services has an institutional bias towards encouraging producers to take a kill approach to carnivores, not coincidentally protecting the agency’s own self-interest. ODFW needs to ensure a balanced approach to handling wolf-livestock conflicts by asserting its leadership and preventing producers and/or Wildlife Services from taking over the process.

4. The Department should re-prioritize livestock conflict responses towards non-lethal solutions and strengthen response protocols.

Even though no depredations have occurred in weeks, the Department has extended authorization to kill two Imnaha wolves. In so doing, the Department has stated that “the action is limited to an area where previous losses have occurred and to private property with livestock activity.” Yet the area in which lethal control can now take place is well beyond that limit, having been expanded by the Department, seemingly to carry out its wish to appease livestock producers. Moreover, the wolves have since moved upslope into forested areas, eliminating the need (if not to appease vocal minorities) to pursue the wolves.

Electronic signals have not been picked up on the pack’s alpha male in weeks. If the alpha male is dead (as clearly suspected, even by agency personnel) and two other members of the pack are killed, Oregon’s only confirmed breeding pack could be at risk.

The Plan states that non-lethal techniques are the preferred solution when wolf-livestock conflicts are reported, regardless of the wolf population status. Yet, there are no binding requirements that livestock producers take any particular actions, including removal of livestock carcasses. It has been reported that wolves that have killed livestock were drawn in to livestock areas by carcasses.

Predator Defense believes the Department has ignored the Plan and violated OAR 635-110-0100 numerous times by:

- Failing to issue permits for injurious non-lethal harassment, as required by section 3;
• Allowing injurious non-lethal harassment and lethal response given that livestock carcasses have been present on lands near or where wolves have preyed upon livestock (sections 3 and 5); and
• Issuing permits for lethal response, when there has been no documentation or proof that efforts to resolve the problems have been deemed effective by the agency (section 5 and 6).

The best way to resolve and minimize livestock conflicts is through education and implementation of non-lethal methods, such as guard dogs, shepherding, fencing, fladry, and improved animal husbandry tactics such as removing/protecting animals in greatest jeopardy such as cows and ewes during parturition and young vulnerable animals, and disposing of carcasses, afterbirths or any other attractant to predators. We appreciate the plan’s emphasis on non-lethal control but suggest it be more clearly defined and be required before receiving financial compensation or permits to allow lethal take. Such provisions need to be more stringently enforced by the Department.

Rather than killing wolves, ODFW should:

• Add to conditions/requisites for issuance of non-lethal injurious permits, as follows:
  - Add a requirement for best husbandry practices, and exhaustion of non-lethal controls, including but not limited to fencing, fladry, electronic deterrents, shepherds, guard dogs.
  - OAR 635-110-0010(3)(d) mentions that issuance of future lethal control permits requires documentation of non-lethal methods but this is not sufficient and should be a requirement of non-injurious as well.

• Regarding the condition for lethal take in act of a livestock attack (rancher take permit) and non-injurious take permits that no unreasonable conditions exist to cause / attract conflict: This needs to be enforced more stringently, since carcasses have been seen on properties where take permits have been issued.

• A requirement for documentation of best husbandry and exhaustion of non lethal practices must include the broad area where wolf activity has been confirmed, not just immediate property of depredation BEFORE issuing non-injurious or rancher take permit.

• Permits should have a specific and limited time length as well as specific boundaries which are not be extended as the wolves move away.
  - Non-injurious permits now for entire grazing period need to be shortened, and boundary limitations should be added.
  - Rancher take permits need to have temporal or geographic limits.
  - Chronic depredation take permits (authorized agent take permits) have no mentioned time or space limits and have recently been extended by weekly increments and by boundary as well. There need to be more parameters put in place to restrict open-ended kill pursuits.

We submit that rancher take permits should not be issued until phase 2 has been reached, and lethal take permits should not be issued for public lands.
If the Department’s goal is to stop depredations, as so stated, it should re-double its efforts in prevention by requiring ranchers to bear more of the burden of raising livestock in or near areas where carnivores would reasonably be found. The Department has stated that “By killing the two wolves, wildlife managers hope to send a message to the pack to not kill livestock.” Experience in the Northern Rockies has shown that randomly killing members of wolf packs does nothing to “teach wolves” not to depredate. Further, studies show that indiscriminate killing of wolves from packs can disrupt pack structure. Wolves have evolved under complex family-based social structures, and maintaining pack structure is important for several reasons. Pack disintegration has been tied to a potential for increased livestock conflicts (Rutledge et al. 2010; Treves 2009; Wallach et al. 2009). Management policies should look beyond numbers to biological and ecological considerations.

5. The Department's temporary rule change is ill conceived and the language is too ambiguous.

Yesterday, on June 29, 2010, ODFW filed a temporary rule change that changes the OAR language guiding lethal responses to wolf-livestock depredation. The rule changes add “in the area” to language pertaining to geographic authority for lethal control. The temporary rule appears to loosen restrictions on the agency authority to focus lethal control in a certain area; for example, if the targeted wolves disperse away from the original depredation site (as the Imnaha pack has). The new rule also allows ODFW to target wolves that depredate “in the area” rather than on or next to one’s property, thus expanding the Department's authority to begin a lethal control process.

No doubt this temporary rule change was submitted to attempt to retroactively justify lethal control activities relating to Imnaha wolves and to provide cover for the Department when Wildlife Services and ranchers maintain pressure to kill depredating wolves, even when the wolves leave the area. The Department is essentially chasing the Imnaha wolves to hither and beyond, just to kill them, even though no depredations have occurred in weeks and the wolves have moved away.

This unfortunate response begs these important questions:

- Will the Department have the courage to let depredating wolves off the hook when spatiotemporal conditions for lethal control no longer exist?
- At what point does the Department simply need to tell Wildlife Services and the livestock producers to accept that sometimes wolves will kill livestock and that this will have to become part of raising livestock near wild areas, because – unless we’re doing it just for revenge purposes – it just doesn’t make sense to chase wolves for weeks or months and tens of miles?

Finally, the language in the rule change request is far too ambiguous; that is, what does “the area” mean? This wording is too ambiguous and allows far too much flexibility in expanding the geographic area for lethal control activities. This temporary rule change is an example of how the Department can lose its grip on wolf management on the slippery slope of responding to special interest pressures. Instead of this particular rule change, we would suggest the Department tighten the rules in the other direction – or simply clarify them – to support the notion that there
will be times when livestock is lost to wolves and that producers need to accept this fact and thus support a strong compensation program.

5. The Plan should provide for a progressive compensation fund that would eliminate producer hardship and the pressure by special interests to kill wolves.

Predator Defense supports implementation of a state compensation fund with funding for compensation at fair market value for livestock losses attributable (confirmed or probable) to wolves. Confirmed with the assistance of authorized agents, use of appropriate non-lethal methods should be documented before awarding compensation.

Ironically, livestock producers themselves have opposed establishment of such a fund. It's curious that producers would turn down compensation for livestock if the program was designed with their assistance and would accomplish their ultimate goals of receiving money for stock. One might reasonably question whether the issue is not in fact about compensation but rather power and control, and the desire to kill wolves. The Department should respond with leadership that establishes it is in charge and committed to restoring wolves on the Oregon landscape. With an adequate compensation program, wolves should not be killed in response to conflicts.

6. Wolves should not be managed to protect or enhance big game herds.

Predator Defense is opposed to wolves being managed or controlled for the benefit of big game or ungulate populations, and we request that provisions allowing such management be removed from the Plan. Wolves and elk (and other prey) have co-existed for thousands of years, with natural ebbs and flows to population demographics, distributions, and densities. Wolves make ungulate herds stronger by preying upon vulnerable or unhealthy animals (Licht et al. 2010), and numerous studies from the Northern Rockies have determined that the primary impact wolves have upon elk is to make them move around, seek cover, and be more vigilant, which also benefits the plant community (Halofsky and Ripple 2008).

George Wuerthner, ecologist, hunter, and former hunting guide, provides these remarks on the need for wolves to regulate game herds (Wuerthner 2010):

Pro hunting organizations are demanding that wolves be “managed” so they will have little effect upon elk numbers which hunters’ desire. If wolves are going to have an ecological influence upon prey species like elk, they will occasionally reduce elk and other prey numbers in some places at some time. Ungulate populations will often stabilize at lower numbers. Other times they will—over time—rise again. But far too many hunters are impatient. Some hunters will remember the “good old days” when they could blast elk without much effort.

The fear among many hunters is that the few well-documented declines in elk numbers reported here and there will become the norm everywhere unless wolves are actively controlled. There is good reason to believe this will not be the case. It’s important to point out that the vast majority of elk herds are holding their own in spite of the
presence of wolves. Indeed, many elk hunting units in Idaho, Montana and Wyoming have populations that are at and/or above agency objectives despite the presence of wolves and other predators.

Among the changes in Yellowstone attributed to wolf predation that many feel are positive—riparian areas are sprouting new growth. Stems of aspen have seen a reduction in elk browsing and subsequent higher proportion of aspen surviving to become mature boles. Beaver have responded to the increase in willows and aspen and are recolonizing areas where they have not been seen in decades. So as to emphasize the last point, this February I watched a beaver gathering willow at the confluence of the Lamar River and Soda Butte Creek in the park—a place where no beaver has been seen for decades. The presence of wolves has led to a reduction in coyotes. Since coyotes are the main predator on pronghorn fawns, the reduction in coyotes has led to more pronghorn. Wolves also produce carrion throughout the year that supports many scavenger species. Some ecologists have even suggested that extra carrion may help counter somewhat the effects of warmer winters due to climate change (in the past harsh winters killed many more elk and created a lot of carrion). These positive changes and more could only occur if wolves are left to “manage” their own numbers.

Unfortunately, most hunters are single minded about what is important and ecological integrity takes a backseat to “getting their elk.” Not only are elk numbers lower in some areas, but research has shown that elk appear to be more alert and wary, and are moving around more than in the past. All of these changes mean it is more difficult to get “your” elk in some parts of the West these days.

Some hunters spend lots of time studying wildlife. They are willing and able to walk all day, day after day for an opportunity to engage with elk and other prey. These hunters are willing to share the land with wolves and other predators. If you asked them, they would say that the presence of wolves enhances their entire outdoor experience whether they actually kill an elk or not. For many it is more exciting to cross a wolf track than a track of an elk. They put ecosystem integrity and the integrity of the wildlife first and foremost.

I do not want to diminish the contribution hunting and angling organizations have made to wildlife habitat acquisitions that benefit all wildlife species. Over the years hunters have contributed many millions towards acquisition of wildlife habitat. Yet such contributions do not give anyone greater “rights” to public wildlife. And the majority of the public wants wolves back on the land, and they want wolves to be wolves, not some emasculated version of their former self. The main value of wolves is their ecological footprint—how they influence ungulate populations. A few token wolves here and there will not be enough to sustain this ecological influence.
Conclusion

Predator Defense reiterates our appreciation for all the time and effort officials have put into developing and implementing the Plan. At the same time, we believe there are appropriate adjustments that need to be made (as outlined above), and that many of these adjustments would actually alleviate the pressure and difficult judgments the Department must make in the face of especially rancher and sportsmen criticisms and pressure. While we sympathize with the fact that predators have always been a controversial subject in wildlife management, we believe it is the Department’s responsibility to educate people (including those from where the strongest political pressures come) and give greater consideration to well-established principles of ecology.

It’s clear that negative attitudes towards predators from hunters and ranchers still dominate management policies of state wildlife agencies. Unfortunately, current predator management policies of most state agencies tends to reinforce negative attitudes and hostility to predators both in how agencies frame the issue of predators, as well as by advocating indiscriminate control that ignores predator ecology and disrupts social organization. We believe that for the Department to take a balanced approach to wolf management, it must resist the temptation to simply mollify certain political pressures. The Department is already perilously close to losing its independence and leadership on wolf management in Oregon.

We hope that you will consider our suggestions; we look forward to your response.

Thank you once again for the opportunity to comment.

Sincerely,

Sally Mackler,
Oregon Carnivore Representative
Predator Defense

References


July 5, 2010

Oregon Dept. of Fish & Wildlife
3406 Cherry Ave., NE
Salem, OR 97303

Dear ODFW,

Wolves existed in Oregon for millennia before humans set foot here. They were an integral part of the forest ecosystem. Once humans arrived in Oregon, their irrational fears, arrogance, and stupidity gradually led to the extinction of wolves in our state.

Now that wolves have a tenuous foothold in Oregon once more, their recovery here is threatened by the same kind of narrow-mindedness that led to the elimination of wolves back in the last century. Enough is enough. ODFW has a responsibility to make sure that this amazing creature can exist in Oregon again. They certainly shouldn’t be sacrificed to protect the narrow interests of a small segment of Oregonians whose principle concern is the promotion of a non-native grazing species.

We’d like to see the ODFW budget for wolf protection increased along with a strong emphasis on education, communication, and outreach. From years of experience coexisting with wolves, ranchers in Wyoming, Montana, and Idaho have made non-lethal adaptations to the presence of wolves in their vicinity. Oregon ranchers can too.

Canis lupus has as much right to live in this state as Homo sapiens do. They were here first. We urge ODFW to take the measures necessary to ensure wolf survival in Oregon and only resort to wolf killing as a last resort.

Sincerely,

Chip Kiger
BJ Novitski
June 29, 2010

Oregon Department of Fish and Wildlife
3406 Cherry Avenue NE
Salem, Oregon 97303
ODFW.Comments@state.or.us

Re: Comments on Oregon Wolf Conservation & Management Plan 5-year Review

Dear Commission Members:

I have observed arguments regarding the wolf management plan during its development and five years of implementation. My comments reflect my opinion that a healthy wolf population plays an essential role in maintaining a healthy ecosystem, thus contributing to the overall goal of a vibrant environment for fish and wildlife, and so directly supporting the seven co-equal goals of the Wildlife Policy.

1. Overall, I still regard the plan as a remarkable document for its thoroughness, balance, and thoughtfulness.

2. Although the Plan has been in place for five years, it is only in the last two years that the wolf population has provided the chance to see the Plan at work. It is too early to make significant changes to the Plan in response to perceived weaknesses in management techniques.

3. The remarkably small number of livestock killed by wolves this spring in Wallowa County suggest the impact of wolves on the ranching industry will be adequately mitigated by the current protections stipulated in the Plan, particularly if a compensation plan can be developed as you suggest. The options for managing wolf populations in the current plan are well-designed and flexible.

4. I support the first and third of the three legislative proposals recommended in the Plan. I believe the suggested amendment to ORS 498.012 is simplistic. It may be possible to modify the permitting process, making it easier for a livestock owner to obtain a permit. But simply omitting the need for a permit opens the door to severe abuse in a climate of strong anti-wolf sentiment.

5. While not an essential comment on the plan I would like to commend Russ Morgan for the very fine job he is doing in Wallowa County this spring, representing ODFW in a highly professional and competent manner under difficult circumstances.
While the Commission and the Plan have the force of the ESA as support, political pressure comes in many forms. I hope the Commission will remain steadfast in its support of a strong wolf conservation plan, and resist political pressure from the ranching industry. In other states the industry is learning that healthy wolf populations can coexist with livestock. I am confident our Oregon industry can make the adjustments to this twenty-first century reality.

Sincerely,

John Thurber
805 N Avenue
La Grande, OR 97850
From: dennisnelson987@yahoo.com [mailto:dennisnelson987@yahoo.com]
Sent: Thursday, July 08, 2010 5:58 PM
To: odfw.info@state.or.us; dennisnelson987@yahoo.com; bioactivist@biologicaldiversity.org; alrasmussen831@hotmail.com
Cc: dennisnelson987@yahoo.com
Subject: LET'S STOP THE GUNNING DOWN OF GRAY WOLVES: OREGON'S WOLF PLAN NEEDS REFORM NOW!

To: Mr. Roy Elicker, ODFW Director. Oregon Department of Fish and Wildlife (ODFW)--Home Office, 3406 Cherry Avenue N.E., Salem, Oregon 97303.

Mr. Elicker=PLEASE BOLSTER THE PROTECTION FOR GRAY WOLVES IN OREGON BY USING THREE PRIMARY MEASURES: [1] REQUIRE the removal or destruction (i.e., rendering inedible) of the carcasses of non-wolf-killed livestock so that the wolves are NOT attracted to areas with vulnerable "stock." [2] ELIMINATE the authorization for killing any wolves not caught in the act of attacking livestock. [3] "RAISE THE BAR" for the consideration of taking Gray Wolves off the "Oregon endangered species list"--from the unsupportable number of four breeding pairs, to a number reflecting the needed distribution within and outside the state to make sure that Oregon's wolves are "connected" to wolves elsewhere (and to ensure the genetic health of the wolves).

Continuing on, the 2005 Gray Wolf management plan is "remiss" in NOT requiring disposal of livestock carcasses. It is FAR BETTER to prevent conflict than to 'scapegoat' the wolves once they have become habituated to preying upon domestic animals. Allowing "wolf control" by federal hunters and trappers to continue will forever prove a DISINCENTIVE to truly seeking to prevent further "wolf/livestock conflicts." It is also likely to prevent the establishment of a viable Gray Wolf population in Oregon--especially as the state of Idaho continues to reduce the number of its wolves. Wildlife biologists recognize that hundreds, if not thousands, of breeding animals are needed to make sure that longer-term genetic health is maintained. In fact, four breeding pairs is "setting the bar way too low" to consider 'state delisting!"

Thanks for considering my views. (Two more added thoughts: This letter is being sent on MY BIRTHDAY--Thursday, July 8, 2010!!!!!!! This is a terrific way to help celebrate it!!!!! The "40th anniversary" of "EARTH DAY" was commemorated this year on Thursday, April 22, and around that time also marked MY OWN PERSONAL "40TH ANNIVERSARY" of being an effective environmental activist--including wildlife conservation issues!!!(

Dear Oregon Department of Fish and Wildlife,

I am appalled by the news I have heard from Oregon about its wolves. Extending the hunt for two of the Imnaha pack for two more months is nothing but an act of revenge. A case of depredation has not occurred since June 4th, yet you keep extending the kill order. By killing two wolves, you are not sending a message to the pack but sending a message to the people. This message says that you do not care about the welfare of wolves but that you will bend without resistance to the wimps of livestock owners. Before the first case of depredation occurred, elk were hazed out of the area and replaced by cattle. Carcasses of dead livestock are left out and not buried like they are supposed to be. The livestock owners are asking for this to happen by not taking every measure possible to protect their herds.

The Imnaha pack is an important part of Oregon’s chance to have wolves roam its countryside once again. With the alpha male missing in the middle of pup season, this is not the time to be hunting for two more wolves.

Please spare these two wolves by calling of this unnecessary hunt. Please stop Oregon’s war on wolves.

I CAN GIVE WITH PLEASURE MY LIFE FOR SAVE THESE WOLVES....TAKE IT !!! GOD BLESS ALL WOLVES ON THIS BAD AND STUPIDE WORLD!

Sincerely,
Agnes Delanis
Hi my name is Corinne Pieper. The reason why, I think it is important to have wolves back in Oregon, they help revive color, to plants, trees, waters. Wolves also help with Nature, like trees will start to grow, grass will grow, and more frogs appear, more fish in streams, ponds, The Mountains will regain color, and Nature will slowly begin to balance out evenly, and I also happen to love wolves due to their majestic ways about them, they help nature year round, and I know for a fact if you got lost in the woods, mountains they would help that lost person and bring them back to civilization, and that is a true fact by the way. Wolves, are misunderstood in their temperaments, they just want to be loved by us, and not harmed by the human race, I think it is a very good idea for the human race to stand by the wolves, and protect them at all times, and watch over them, and let them live in peace, and around us at all times. Please help protect the wolves, don't let the human race kill them.
corinne pieper
For your information; these email from citizen in state of Oklahoma. – Teri Kucera

I strongly urge you to go by OR plan/law! The above permits contradict above by: 1. Lack of evidence, 2. Untrained personnel to 'confirm' wolf alleged predations, & 3. Non-lethal methods of control was not done.

Ranchers have to 'change their behavior', not to attract & encourage wolves (like: keep livestock in at night, have appropriate dogs, don't leave after-birth & carcasses & such- out). Predators/wolves are vital to ecosystem balance. The 3 S's (shoot, shut-up & shovel) must not prevail. The false stories (the 'big bad wolve') & scare tactics are ignorant & manipulative. We have to learn to co-exist with our wild relatives, we are greater for it. They after all, are just trying to support their families, like we are.

Do your job- protect Our Public lands, waters, wildlife, health & ecosystems!

Your attention to this most urgent matter would be much appreciated by all present & future generations of all species.

Thank you

Lydia Garvey Public Health Nurse
429 s 24th Clinton OK 73601
Please bolster protection for wolves in Oregon through three primary measures:

1. Require the removal or destruction (i.e., rendering inedible) of the carcasses of non-wolf-killed livestock so that wolves are not attracted to areas with vulnerable stock.
2. Eliminate the authorization for killing wolves not caught in the act of attacking livestock.
3. Raise the bar for consideration of taking wolves off the Oregon endangered species list, from the unsupportable number of four breeding pairs to a number reflecting the needed distribution within and outside the state to ensure Oregon's wolves' connectivity to wolves elsewhere and the wolves' genetic health.

The 2005 wolf plan is remiss in not requiring disposal of livestock carcasses. Far better to prevent conflict than to scapegoat wolves once they become habituated to domestic animals.

Allowing continued wolf "control" by federal hunters and trappers will forever prove a disincentive to truly seeking to prevent wolf/livestock conflict. It is also likely to prevent establishment of a viable wolf population in Oregon -- particularly as the state of Idaho proceeds to reduce its wolf numbers.

Scientists recognize that hundreds, if not thousands, of breeding animals are necessary to ensure long-term genetic health. Four breeding pairs is setting the bar way too low to consider state delisting.

And why does everyone come down on the wolf anyway? The wolf is one of the better species of animals inhabiting this planet. They kill, when left alone by Man who encroaches on his territory, the sick, old and lame of a herd, actually making that herd stronger. The fact the Man has taken it upon himself to literally TAKE OVER the planet totally disregarding the RIGHTS of other species sharing that planet, is a poor excuse for annihilating the planet's most wonderful species! Everyone seems to be coming down on the wolf, and there's NO GOOD REASON behind it! Unless you include Man's greediness and hatred for things He does not understand.

The wolf even controls it's own population by the Alpha pair, the only breeding pair in a pack, not breeding if there are not enough prey animals in there territory to support themselves and any newborn cubs. Man could learn a thing or two from that! He keeps multiplying until he has now totally overrun a planet which was not mean to hold near the number of inhabitants it now has. And he just keeps breeding - available land and resources be damned!!

The killing of these beautiful, sentient, intelligent creatures is a shame and disgrace to your department and your state, as well as to others who are doing the same thing!! And not one of you has a really GOOD reason for murdering these animals. PLEASE give this deeper thought before carrying out irreversible damage to this wonderful species of animal!!

Thank you for your consideration.
The Imnaha Wolf Pack should not be hunted. This pack has the only breeding pair in the state and these wolves must be secured and protected. Why would carcasses be allowed to remain, as if bait for wolves? This only encourages wild animals to take advantage of dead livestock.

The wolves should remain on the Federal Endangered Species List. Wildlife biologists and scientists fought long and hard to establish viable wolf packs back to this country and we need to continue this effort at all costs.

Aleta Pahl
14 Miller Road
Apt 203
Rhinebeck, NY  12572

pahlpahla@aol.com
Christopher P Schubothe

From: alice pueschner [paljack@comcast.net]  
Sent: Tuesday, June 29, 2010 10:45 AM  
To: ODFW.Comments@state.or.us  
Subject: Killing of OR wolves

I am writing because the maintaining of a mere four pair of breeding wolves in Oregon before wolves are taken off the state protection makes no scientific sense whatsoever. It has been determined that wolves fill an important niche in the ecology, and they must be allowed to succeed at that.

Furthermore, ODFW should make plain the procedure ranchers must take to make complaints of livestock killing, and ODFW should be in charge of such investigations, conflict prevention, and response. It should not be the USDA - Wildlife Services.

Independent wildlife scientists should be consulted and far more scientific evidence considered in setting up a wolf management plan.

Please do consider my opinion,

Alice Pueschner
PLEASE do something about this. We pride ourselves on being the more intelligent species, but then we act irresponsibly and blame the animals for harming us by acting on their survival instincts. There is a problem in wolves and ranchers cohabitating, but the laws need to be made so that they place responsibility where it belongs. It is not the wolves responsibility to walk away from an easy meal. It is our responsibility to respect all creatures' needs to eat and to take appropriate steps to prevent wild animals from getting access to the things that are important to us, like cattle. If we who are so morally advanced cannot respect the wolf, why do we complain and punish it for not respecting us?

Please bolster protection for wolves in Oregon through three primary measures:

1. Require the removal or destruction (i.e., rendering inedible) of the carcasses of non-wolf-killed livestock so that wolves are not attracted to areas with vulnerable stock.
2. Eliminate the authorization for killing wolves not caught in the act of attacking livestock.
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Scientists recognize that hundreds, if not thousands, of breeding animals are necessary to ensure long-term genetic health. Four breeding pairs is setting the bar way too low to consider state delisting.

Thank you for your consideration.

Angela Galdabini
8747 Phinney Ave N #8
Seattle, WA 98103
US
I am a lover of wolves. They are a family pack. They do not abort their babies or put their old ones in old folks homes and desert them. What is this that I am hearing about you allowing the aerial shooting of the Imnaha Pack?

I hate to see the wolves wiped off the face of the earth. They were put here on earth for a purpose. They help keep the ecosystem in check. The old, sick and lame of the herds are killed to feed the pack. They do not kill just to kill. Unless it is another pack which trespassing on their turf.

They will fight to protect their pack. There has only been two incidents of man and wolves together. One was where the man put too much deer urine on his body and the wolves thought it was a deer. Second was where this photographer was shooting scenes. He heard his sled dogs being attacked by wolves. He went to them to protect them and the wolves saw it was a man and ran off.

I think wolves are beautiful animals. The farmers and ranchers have encroached on the wolves territory. The hunters blame the wolves for lost of wildlife. Baloney. This is just a cry to get the wolves killed. They would complain if there were no wolves around to keep the herds in check. I have done some research and there is no proof that the wolves are killing the livestock.

Please protect the wolves. If the wolves are gone the coyotes would take over. They are not afraid of humans as the wolves are. Do not let the Imnaha Pack be no more. Please protect them. If you have too please put them on a reserve or a place where they can be protected. If I could take them I would. But I do not have a place where I can take them.

El Paso County took the word of a vet in New York City that the wolf-hybrid and wolves could not use the rabies shot. That it would not work on them. I call the vet and he hung up on me, when I asked him if he ever did an experiment on the wolves and have them be given a rabies shot; then later have them be bitten by a rabid animal. He hung up on me. So I must have offended his integrity.

Please let me know what your plan is to protect these magnificent animals.

Barbara Bussell  8601 Dyer St. #107  El Paso, Tx. 79904-2302  915-4433609
bjbussell@live.com
As a sixth generation Oregonian and descendant of Jason Lee, I take wildlife preservation in Oregon Very Seriously! As a child we hunted deer in the Ochoco Mountains, and fished for trout in the McKenzie and Deschutes rivers. We camped everywhere in Oregon, and I have come to love every bit of it and believe it is our duty to preserve it for future generations.

I believe from everything that I have read on the subject that Four breeding pair of Wolves are not enough to maintain a viable population.

I have lived with Coyotes in my backyard for many years, and keep goats, horses, and pets. I have put my dog, and cats in the house in the night, and the goats in the barn to protect them. I believe it is my job to also protect the wildlife by encouraging the natural system in Oregon.

Please bolster protection for wolves in Oregon through three primary measures:

1. Require the removal or destruction (i.e., rendering inedible) of the carcasses of non-wolf-killed livestock so that wolves are not attracted to areas with vulnerable stock.
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Scientists recognize that hundreds, if not thousands, of breeding animals are necessary to ensure long-term genetic health. Four breeding pairs is setting the bar way too low to consider state delisting.

Thank you for your consideration.

Barbara (Hutchinson) Jansen
31618 Bryant Way
Albany, OR 97321
US
Dear sirs, I am a strange breed of person. I like wolves, but feel they have to be well managed. I hate both sides of this debate because neither side is willing to budge in there thinking.

Right now, I am very pleased with your management of the wolves in the Northwest corner of Oregon. I think issuing the kill permits was a good move on your part. I just hope that the ranchers will abide by the limitations of the permits and that the "pro wolf" contingent will not get in the way of what needs to be done.

I recently read the HCPC's letter to you, asking you to use non-lethal means to control the wolves. I'm sorry, but I found that somewhat ridiculous. I raise sheep in the Willamette Valley and I along with many others have been trying "non-lethal" tactics of protecting our sheep from coyotes for years. They work for a while, but before long, the coyotes figure it out. Wolves are smarter!

I really wish both sides could find some common ground and work together with you for the good of both the ranchers and the wolves.

Thank you for your hard work and dedication in this project. You are doing a very difficult job!!

Belinda
Please accept my comments about wolf management in Oregon. These large predators are important to a healthy ecosystem, and deserve our protection. We have not done our best for these iconic animals in the past. Let's pledge to do better by them now and in the years ahead. Thank you.

Benton Elliott
1313 Lincoln Street, #605
Eugene, Oregon 97401
Dear Sirs:

In 2003 ODFW wrote the mission statement for the newly-formed Wolf Advisory Committee. In part, it stated: "The goal of this management plan is to ensure the long-term survival and conservation of gray wolves as required by Oregon law..." I was one of the committee members, serving as a citizen-at-large.

We met monthly for over a year, hammering out compromises from all aspects to come up with a plan to comply with the mission statement and Oregon law. We arrived at that plan, overwhelmingly approved by the committee. The Oregon plan has since been held up as exemplary by other states with wolves, and it is now time for the 5-year review.

Not one thing has happened during this time that is not covered by the plan. Offending wolves are being removed from the population as directed by the plan where necessary. As it is, we have only about 14 wolves for certain in the state. To comply with the law and the mission of ODFW, the Wolf Management Plan must not be weakened in any way.

As I write this, the alpha male from the only known breeding pair is missing. Permits issued to ranchers dictated the collared alpha pair was to be left alone. Perhaps the collar has failed, but that is somewhat unlikely. There is the strong possibility the male has been killed by someone anti-wolf who disregards the law. Do we REALLY want to make it easier to kill wolves for these people, and "trust them" to follow whatever new guidelines that might come forth? The answer is obvious: no.

Living with predators is part of the ranching process in remote areas near wilderness. Coyotes killed 5700 sheep in 2004 statistics, cougars another 1200. And ODFW estimates over 5000 cougars are in Oregon. The panic that 14 wolves cause amongst some people is simply out of proportion and unreasonable.

For losses from other predators, the rancher is not reimbursed. For confirmed wolf kills, Defenders of Wildlife does reimburse. This compensation is fair and unique.

To weaken the plan now would be to undermine the the ODFW mission statement, Oregon law, and the hard work of the committee. I trust ODFW will realize this and leave the plan intact.

Sincerely,

Bill Gawlowski
18752 Choctaw Rd.
Bend, Oregon 97702
To Whom It May Concern,

I sent in an email concerning wolves, with the help of the Center for Biological diversity, but I would like to continue in my own words:

Our ecological communities suffer from the absence of the larger predators all over the country. In Oregon, with the wolves returning, we have an opportunity to support a return to healthy natural communities. I know a coexistence with human members of the community is key, but it seems to me the prompt removal of carcasses is a relatively easy way to help out in this area, both so that the wolves do not get into the habit of coming close to livestock operations for food and so that they do not get the blame when livestock have died from other causes.

I also think it's important to keep the wolves protected as endangered species and of course this means many breeding pairs, not just four. I can't imagine where that number came from, but it has no substantiation in population science.

Thanks for considering my thoughts and for looking beyond the traditional "livestock over wildlife" and "wolf as evil vermin" attitudes which have arisen so long ago and need to be completely revised. There are ranchers who will take compensation for losses attributable to wolves, but the real causes of death are hard to figure out when carcasses are not promptly removed.

Best regards,
Bonner McAllester
Monterey, Massachusetts
>
I understand the current plan and cautiously welcome wolves to Oregon but want to make sure that the line that defines when the conservation ends and the management starts doesn't change.

Sent from my iPhone
Dear ODFW,

I heartily agree with the following Oregon Wild sentiments. My wife and I have followed the Oregon Wolf Plan and are amazed that you would consider killing two of the 14 wolves in Oregon. Ranchers are being compensated for confirmed livestock losses. So what's the big problem that requires killing 1/7 of an Oregon endangered species?

-------------------

As you review Oregon’s Wolf Conservation and Management Plan, I urge you to consider implementing stronger protections for Oregon’s wolves.

After being extirpated from the state, wolves are now an endangered species in Oregon. The objective of the wolf plan ought to be a sustainable recovery of this native predator. Meaningful recovery can only be achieved using science-based wildlife management. Management should aim to protect Oregon’s native species and ecosystems, not appease narrow special interests.

Wolf recovery numbers are far too low—4 breeding pairs is not enough to ensure a meaningful and sustainable recovery. What's more, the plan is severely underfunded.

Finally, in implementing the plan, ODFW must emphasize the use of non-lethal tools to reduce and prevent conflicts including effective communication, education, and outreach. Lethal control should only be an option of last resort.

As the agency charged with managing Oregon’s wildlife for the benefit of all, I thank you for accepting my comments. Please redouble your efforts towards restoring balance to Oregon’s ecosystems by giving wolves the strong protections they need.

Very Sincerely,

Brian Hines

Brian Hines
10371 Lake Drive SE
Salem, OR 97306
Americans have somehow gotten the idea that our right to exist on Earth outweighs that of all other living creatures. I view plans to exterminate native wildlife (for instance, wolves) as wrong to the same degree as the government's earlier policies of decimation and sequestration of Native American peoples.

Human usurpation of native habitat has already endangered the very existence of (and caused the extinction of) hundreds of animal species. It is simply shameful that humans, with our overpowering advantages of intelligence, tools, and technology, are still resorting to primitively killing our less well equipped competitors.

I am deeply concerned about your agency's proposal to exterminate more of Oregon's wolves this year. Please do not rig the playing field even further against Oregon's wildlife.

I urge you to bolster protection for wolves in Oregon through three primary measures:

1. Require the removal or destruction (i.e., rendering inedible) of the carcasses of non-wolf-killed livestock so that wolves are not attracted to areas with vulnerable stock.

2. Eliminate the authorization for killing wolves not caught in the act of attacking livestock.

3. Raise the bar for consideration of taking wolves off the Oregon endangered species list, from the unsupportable number of four breeding pairs to a number reflecting the needed distribution within and outside the state to ensure Oregon's wolves' connectivity to wolves elsewhere and the wolves' genetic health.

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Allowing continued wolf "control" by federal hunters and trappers will forever prove a disincentive to truly seeking to prevent wolf/livestock conflict. It is also likely to prevent establishment of a viable wolf population in Oregon -- particularly as the state of Idaho proceeds to reduce its wolf numbers.

Scientists recognize that hundreds, if not thousands, of breeding animals are necessary to ensure long-term genetic health. Four breeding pairs is setting the bar way too low to consider state delisting.

Thank you for your consideration.

C. Cramer
132 Clark
Billings, MT 59101
US
Oregon Department of Fish and Wildlife       June 30, 2010

Via E-mail: ODFW.Comments@state.or.us

Re: Oregon Wolf Conservation and Management Plan revision process.

To Whom it May Concern,

The Center for Biological Diversity is a national non-profit conservation organization dedicated to protecting and restoring imperiled species and their ecosystems. The Center is supported by 7,000 members and on-line activists within Oregon, and 255,000 nationwide. Since our founding in 1989, we have played an active role in promoting the recovery of gray wolves in the United States. We appreciate the opportunity to comment on the Oregon Wolf Conservation and Management Plan and to recommend changes.

Introduction

The 2005 Oregon Wolf Conservation and Management Plan represents the good faith efforts of many Oregonians to express their values and interests, to listen respectfully to others’ points of view, and to develop a plan that seeks to balance disparate policy and management approaches. We honor the wolf plan and those who created it for the commendable acts of civic participation that went into its creation. Nevertheless, in significant respects the wolf plan is scientifically unsupportable and legally deficient. The plan as written will not suffice to prevent the re-extirpation of wolves from the State of Oregon – much less to ensure their biological recovery. For these reasons, we request fundamental changes in the plan.

The overarching flaw in the Oregon Wolf Conservation and Management Plan is that it permits livestock owners to demand the trapping and shooting (“take”) of wolves without providing safeguards to limit such take. The ensuing aerial gunning of wolves in eastern Oregon, including an ongoing effort to kill two wolves from the state’s only breeding pack, along with aggressive wolf reduction measures undertaken in Idaho, undercut the wolf plan’s blithe assumption that wolf numbers will steadily increase in the state. In a related flaw, the wolf plan would remove wolves from the state endangered list at an arbitrarily low number of wolves and without ensuring the population’s security.

Non-lethal Wolf Deterrence is Voluntary and Feckless

The Oregon Wolf Conservation and Management Plan suggests that state-endangered wolves will receive some tolerance when they prey on livestock through managers’ “first choice” use of “non-lethal techniques such as radio-activated guard devices, non-injurious harassment, fladry, husbandry, and others.” (p. 38) However, such measures are entirely voluntary:
Generally, non-lethal techniques should be the first choice when wolf/livestock conflicts are reported. . . Wolf managers and livestock producers are not required to exhaust all non-lethal techniques, but instead, a good faith effort to achieve a non-lethal solution is expected. . . [L]ivestock producers will be encouraged to employ management techniques to discourage wolf depredation, and agencies will advise and assist in implementing such techniques. (p. 39, italics added)

The wolf plan’s official encouragement to livestock owners to deter wolves from preying on livestock is not nearly as consequential as its extension of almost absolute authority to livestock owners – and their adjoining neighbors -- to order the killing of wolves, including those that have depredated just twice or depredated even once but reported to have “attempted” to depredate on other occasions:

State or federal agents are authorized to use lethal force on wolves on public or private land at a property owner’s or permittee request if the property or an adjacent property has had either two confirmed depredations by wolves on livestock or one confirmed depredation followed by up to three attempted depredations (testing or stalking). For such action to occur, the following criteria apply:
• The action must be conducted by authorized state or federal personnel only.
• Attempts to solve the situation through non-lethal means must be documented.
• No unreasonable conditions exist that are attracting wolf-livestock conflict. (p. 43)

In practice, Oregon Department of Fish and Wildlife has interpreted the last bullet point – unreasonable conditions attracting wolves – as to exclude the existence of livestock carcasses that drew wolves in to scavenge before they began depredating. The two wolves shot last fall for depredating, and the Imnaha Pack of which two wolves are currently hunted, were both drawn to the presence of livestock by carcasses of stock that they had not killed. Non-lethal means that do not include consistent burial or destruction (for example through the use of lime) of livestock carcasses before wolves scavenge on them and begin to depredate will seldom prove successful, rendering meaningless the requirement to attempt them.

For wolves to be targeted after just two or even a single depredation will preclude their establishment almost anywhere in Oregon. “Wolf managers working with livestock producers are encouraged to employ management techniques that have the highest likelihood of success to resolving the conflicts and that are reasonable for the individual situation” (p. 39). Once a conflict has developed – i.e. wolves have learned to hunt livestock – clearly the action most likely to end the conflict is to kill the wolves, since dead wolves will not prey on stock again and even the most deterred live wolf might still resume depredating. The wolf plan notes that in the northern Rocky Mountains “members of wolf packs encountering livestock on a regular basis are likely to depredate sporadically” (p. 36). In almost all of Oregon, wolves will encounter livestock on a regular basis, and unless management differs from that practiced in the northern Rockies – principally in the matter of livestock carcass disposal – Oregon wolves too will sporadically prey on stock.

Such sporadic depredations perpetrated by the Imnaha Pack, the last of which occurred on May 31, a full month ago, sufficed to authorize the shooting of two of that pack’s members.
These animals are currently being hunted despite the fact that the Imnaha Pack is the only reproducing pack known in Oregon. Despite or perhaps because of the repeated invocation of the romantic yet elliptical phrase “human tolerance” in the Oregon Wolf Conservation and Management Plan (see below), the essence of the wolf plan is \textit{wolf control}. And that is how the plan is interpreted and carried out in the field.

\textbf{State Wolf Recovery Goal is Scientifically Unsupported and Legally Deficient}

The Oregon Wolf Conservation and Management Plan’s criterion for delisting wolves, although obfuscated through recommendations (that have no backing in the Oregon Endangered Species Act and thus do not carry the force of law) for management after delisting, is shockingly at odds with modern scientific findings:

The conservation population objective for Oregon is defined as four breeding pairs of wolves present for three consecutive years in eastern Oregon. This population objective represents a sufficient number of wolves to ensure the natural reproductive potential of the wolf population is not in danger of failure. . . . This conservation population objective is based on the prediction that, if the protections of the Oregon ESA are withdrawn when four breeding pairs have been present for three consecutive years in eastern Oregon, a naturally self-sustaining population of wolves would continue to exist in Oregon. This will support the necessary findings on the delisting criteria, justifying a Commission decision to delist the species” (p. 27).

To justify removing wolves from the state endangered species list after establishment of just four breeding pairs, the wolf plan states, “Research published in 2003 suggested that the smallest viable wolf populations might be two to three adjacent packs with four wolves each, located 40-60 kilometers apart (Fuller et al. 2003)” (p. 28). Perusal of the cited article [Fuller, T.K., L. David Mech and Jean Fitts Cochrane. 2003. “Wolf Population Dynamics.” In: \textit{Wolves, Behavior, Ecology, and Conservation}. Eds. L. David Mech and Luigi Boitani. University of Chicago Press (pp. 161-191)] reveals that this statement reflects a misreading of this passage: “[A] single, isolated pack should have a lower chance of persisting than a group of several adjacent packs. . . . [I]f we were prescribing a formula for the smallest demographically viable wolf population, we might include two to three adjacent packs” (Mech & Boitain, p. 163). The two to three \textit{adjacent} packs, in this off-the-cuff sounding remark, would be in addition to a single pack – totaling three to four adjacent packs that might, conceivably, be viable. Nor do the authors suggest, as the wolf plan intimates, that this casual reference to a prescription for an imagined formula is based on “research;” it is proffered more as a gut-level guestimate.

In contrast, the best available current science indicates a numeric threshold for viability that is scales of magnitude greater than four packs. For example, in Traill, L. W., Corey J. A. Bradshaw, and Barry W. Brook, Minimum viable population size: a meta-analysis of 30 years of published estimates. Biological Conservation 139 (2007) 159-166, researchers found that based on all available literature, the 95\% confidence interval for minimum viable population size for mammals is 2,261 to 5,095. Since those numbers refer to an effective population – that is,
breeding animals -- the actual population range to achieve viability for wolves, most of which do not breed, may be several times higher.

The wolf plan concedes that “State law does not allow the presence of healthy populations of wolves in adjacent states to satisfy delisting criteria, regardless of their importance to wolves located within the state. The number of breeding pairs and their distribution within Oregon must be sufficient to stand alone in determining whether the delisting criteria are met” (p. 29). Thus, the four breeding wolf packs in eastern Oregon that are contemplated as the trigger for consideration of statewide delisting would have to be viable without reference to wolves in Idaho – a highly doubtful situation even as measures undertaken to reduce Idaho’s wolf numbers may indeed result in diminishment or cessation of wolf immigration from Idaho.

Despite the wolf plan’s proclamation that four breeding pairs would sustain the population, thus justifying a Commission decision to delist, the legal criteria for delisting will not be met at just four breeding pairs:

- The species is not now (and is not likely in the foreseeable future to be) in danger of extinction in any significant portion of its range in Oregon or in danger of becoming endangered; and
- The species’ natural reproductive potential is not in danger of failure due to limited population numbers, disease, predation, or other natural or human-related factors affecting its continued existence; and
- Most populations are not undergoing imminent or active deterioration of range or primary habitat; and
- Over-utilization of the species or its habitat for commercial, recreational, scientific, or educational purposes is not occurring or likely to occur; and
- Existing state or federal programs or regulations are adequate to protect the species and its habitat.

These determinations must be based upon verifiable scientific information” (p. 15)

Contrary to the first bullet point, delisting could occur without a single wolf inhabiting the entirety of western Oregon. The wolf plan’s delisting criteria thus effectively define western Oregon as not a significant portion of the wolf’s range in the state – an unsupportable finding.

The second bullet point is also absurd, since just four breeding pairs -- even if they were not at continued risk of government persecution, which they would be -- would not be genetically viable. Reintroduced Mexican gray wolves in the Southwest have experienced a major decline in reproductive potential due to inbreeding depression (see Fredrickson, R.J., P. Siminski, M. Woolf, and P.W. Hedrick. 2007. Genetic rescue and inbreeding depression in Mexican wolves. Proceedings of the Royal Society Bulletin 274:2365-2371); four wolf pairs in Oregon would also be likely to experience inbreeding depression and declining fertility.

Certifying the third bullet point would also prove difficult, since ongoing grazing of wolf habitat surely comprises active deterioration of the wolf’s range or primary habitat -- even disregarding that a single wolf population would indeed comprise “most” of the state’s wolf population(s).
The last bullet point, touting existing state or federal programs or regulations adequate to protect the species and its habitat, are contradicted by the uncircumscribed authority to “control” wolves within the wolf plan itself.

“Suitable Habitat” for Wolves is Chimerical and Subordinates Conservation to Livestock.

The Oregon Wolf Conservation and Management Plan’s first objective for wolf distribution, population management, and monitoring, together with its footnote, ensure the supremacy of wolf “control” over wolf recovery: “Permit establishment of a naturally reproducing wolf population in suitable habitat within Oregon, connected to a larger source population of wolves, which allows for expansion into other areas of the state” (wolf plan, p. 16). The footnote is as follows:

Suitable habitat (e.g., high, medium, low suitability) is defined by factors including availability of natural prey, level of human occupation, level of livestock activity, and density of open roads. As habitat generalists, wolves are able to survive in many places. Therefore, unsuitable habitat likely will be defined by human tolerance. Without specific data or experience with wolves on the Oregon landscape, defining the range of habitat suitability must be necessarily vague at this point in time. (p. 16)

The flip side to permitting establishment of wolves in “suitable habitat” within Oregon is that within unsuitable habitat wolves will not be permitted to persist. And unsuitable habitat turns out to be almost all of the State of Oregon. In fact, it is unclear if there is any landscape in Oregon sufficiently large to sustain a wolf population through both summer and winter, in which – setting aside the vexatious question of how to measure the effect of “human tolerance” on wolf survival – high levels of natural wolf prey and low levels of human occupation coincide with low numbers of livestock and a low road density. The wolf plan’s definition of suitable habitat, coupled with the broad authority it grants livestock owners to command the removal of depredating wolves, effectively defines large swaths of public and private lands as unsuitable and thereby precludes the conservation of wolves in Oregon.

Invoking “Tolerance” Serves to Cloak Brutally Unscientific Practices

Tolerance – as in “human tolerance” and “social tolerance” -- serves in the Oregon Wolf Conservation and Management Plan as an unquestioned lodestar, elevated at once to the status of formal objective but also serving as the rationale behind wolf control. The second objective listed in the wolf plan is to “Promote social tolerance for wolves by effectively and responsibly addressing conflict with competing human values through the use of management measures consistent with long-term wolf conservation in all phases of wolf management status under this plan” (p. 16). The wolf plan states that “The ability to persist will be determined largely by the degree of human tolerance for the species across the state’s vast rural landscapes” (p. 18) – an assumption which if true gives credence to the notion of killing some wolves (referred to in the oblique if not Stalinist-sounding phrase “management measures”) to ensure the persistence of others. (This assumption also underlies the issuance of take permits for a state endangered species under Oregon law, since such take is only allowed upon a finding that the take “is
consistent with conserving the species in Oregon“ – p. 40.) Yet, it turns out that “The locations of livestock on the landscape will influence both distribution and public acceptance of wolves” (p. 24). Thus, it appears, where there are livestock, public acceptance (i.e. social tolerance) will be lower, and wolves will seldom if not never be permitted to persist. Even the wolf plan’s reassurance that wolf distribution will expand robustly in the state, comes with caveats:

It is not the intent of this plan to physically zone the state. However, de-facto zones will exist because management responses will consider habitat suitability factors as defined in footnote 22 (page 16) [i.e. natural prey, human occupation, livestock, open roads, and human tolerance]. Management responses to situations of wolf/human conflict are expected to result in some areas that are not suitable for persistent wolf occupation and others where wolf occupation merits encouragement (e.g., den sites, abundant prey, low human activity). While wolves will not be distributed throughout all of their historic range in Oregon, wolf distribution will not be restricted by management actions to only the most secure habitats. Management must recognize that suitable habitat may well exist outside of these areas and provide opportunity for colonization. Allowing wolves access to habitat throughout the state is intended to provide for their long-term survival in the modern Oregon landscape if in so doing social tolerance is not reduced as a result of conflict. (p. 24)

That last phrase, premising wolves’ access to habitat on not reducing social tolerance as a result of conflict, reinforces that at its heart, the wolf plan prescribes or at least severely limits wolf residency in regions with livestock.

Wolf Control Trumps Tolerance

The premise that wolf control can increase human tolerance, and thus allow for wolf recovery is the orthodox position of the U.S. Fish and Wildlife Service, and has served as the basis of policy and management in each of its three gray wolf recovery programs. In the Great Lakes and the northern Rocky Mountains, authority to conduct wolf control proved consistent with increases in the numbers of wolves. In both regions, wolves had access to millions of acres with either no livestock or almost no stock. Wolves in these livestock-free areas consistently replenished wolves in areas of livestock occupancy where wolf control depleted numbers.

The third gray wolf recovery program run by the Fish and Wildlife Service, for the Mexican gray wolf in Arizona and New Mexico, relies on the same policy assumptions but – similarly to landscape management in Oregon – does not include millions of acres devoid of livestock. Mexican gray wolves were reintroduced to the 4.4-million acre Blue Range Wolf Recovery Area in 1998, with an initial goal of establishing at least 100 wolves by 2006, including a projected 18 breeding pairs. Those expectations have been dashed largely as a result of federal predator control. Eleven wolves have been shot by the government, 18 killed inadvertently as a result of capture, and 34 have been captured and not released back to the wild. At last count in January 2010, just 42 wolves including two breeding pairs existed in the wild.

The record with reintroduced Mexican gray wolves demonstrates that a small population of wolves can be effectively suppressed through federal predator control. If predator control is
the likely response to wolf depredations, then growing wolf numbers beyond a few breeding pairs requires either ensuring that wolves are not drawn to livestock, or millions of acres with essentially no livestock. The Oregon Wolf Conservation and Management Plan, through its lack of meaningful measures to deter wolves from depredat ing the livestock they must encounter regularly, and through its free-fire policy against wolves that depredate just once or twice, precludes wolf recovery in the state.

**Summary and Recommendations**

The revision of the Oregon Wolf Conservation and Management Plan should include three fundamental reforms, as follows:

1. Require the removal or destruction (i.e., rendering inedible) of the carcasses of non-wolf-killed livestock so that wolves are not attracted to areas with vulnerable stock. Such a provision would do more to prevent depredations than fladry and other cited measures.

2. Eliminate the authorization for killing wolves not caught in the act of attacking livestock. The provision allowing government personnel to kill wolves days, weeks or months after depredations is punitive and bears little practical relation to preventing future wolf depredations, since other wolves may take the place of those that are killed.

3. Raise the bar for consideration of taking wolves off the Oregon endangered species list, from the unsupportable number of four breeding pairs to a number reflecting the needed distribution within and outside the state to ensure Oregon's wolves' connectivity to wolves elsewhere and to ensure the wolves' genetic health. Citing an offhand written reference to an imagined “formula” that might allow four wolf packs to be viable, despite abundant genetic evidence to the contrary, is not defensible.

**Historical Correction**

The Oregon Wolf Conservation and Management Plan erroneously reports that “The last record of a wolf submitted for bounty in Oregon was in 1946 for an animal killed in the Umpqua National Forest in southwest Oregon” (p. 5). However, as reported in Robinson, M. J., *Predatory Bureaucracy: The Extermination of Wolves and the Transformation of the West* (University Press of Colorado, 2005), p. 286, and as evidenced in the copy (see below) of part of a page from the Oregon bounty ledger books from 1946 to 1947, the last wolf in the state was turned in for a bounty on February 7, 1947:
Thank you for your consideration.

Sincerely,

Michael J. Robinson
Conservation Advocate
Dear Fish and Wild Life:
Please let the wolves take care of themselves. Don’t let the farmers or ranchers kill them. There must be a way to keep them away from the livestock. Shooting them or culling them is not the way to do it like Idaho, Montana and Alaska. Here in Arizona, the Grey wolf is almost extinct. Please get together with the animal activist groups and figure out a more humane way.
Sincerely,
Cindy Wines
Animal Defender and Lover
www.Earthandanimalwellness.com
To Oregon Fish & Wildlife Commission:

My husband and I are writing to comment on the Oregon Wolf management plan and the Administrative Rules governing them. There are some defects in these two documents that we feel need to be changed in order for ranchers, like ourselves, to be able to live with the wolves and still maintain a viable livestock business and livelihood. We agree with the Oregon Cattleman’s Association (OCA) request for changes to the Oregon Wolf Conservation Plan as was submitted to you.

We feel we should have the right to defend our homesteads. Around our house we have chickens, dogs, cats, sheep and calves. These are all easy prey for a scavenger. If an animal is hungry, they will come close to houses looking for food. We have had to control coons, skunks and even cougars because they killed our animals close to our house. We suffered a loss, but it was minimal because we had the ability to eliminate the problem. That ability does not exist when it comes to a wolf and we feel we it should.

To be able to only shoot a wolf if we see it biting our livestock is ludicrous. We have a better chance to be hit by lightening. The wolves seem to attack at night. Will we be able to shoot them if we see it biting with the aid of a spotlight? Probably not. The OCA would like harassing and chasing added to this. With humans it is a warning that harm may come to a person if someone is harassing them. Animals are no different. As for chasing, I don’t think the wolf and the livestock are just playing a game.

Second, wildlife services should have the say if a depredation is a wolf kill or not. The person we have in Wallowa County has based his findings off of facts and he knows what to look for. The representative from ODFW does not seem to have a clue. I can’t believe someone thinks trauma (like a bruise) can happen after the heart stops beating. The ODFW representative is making excuses so it does not have to be a wolf depredation because his agency is trying to protect them so Oregon can have lots of wolves. This is a conflict of interest. The agency that has to manage and protect them should not make a depredation call. It becomes too emotional. A knowledgeable third party in this area is better.

We hope you will strongly consider the comments that OCA made. Changes need to be made so we can co-exist with the wolves. It would be better if we just did not have any wolves, but since we do, we need to have the tools to be able to minimize our losses. Please give us those tools.

Sincerely,
Dan & Cynthia Warnock
Christopher P Schubothe

From: David Mildrexler [david@hellscanyon.org]
Sent: Wednesday, June 30, 2010 12:39 PM
To: ODFW.Comments@state.or.us
Subject: Oregon Wolf Plan

Dear ODFW,

Please accept these comments on the Oregon Wolf Plan,
June 30th, 2010

Regarding the recent return of wolves to Oregon, first I recognize that this was their home for tens of thousands of years before we poisoned them, shot them, trapped them, and passed on generations of false myths regarding their behavior. Wolves and humans have a much longer history together than we do apart. We forget sometimes what a part of this ecosystem we are.

I lived in Montana for a decade before moving to northeast Oregon. It was thrilling seeing wolf tracks and scat around the mountains near Missoula, or finding a kill deep in roadless country. We have waited patiently for wolves to return to Oregon. We now need to commit to maintaining a sustainable and ecologically significant wolf population in Oregon. By ecologically significant, I mean a population that is substantial enough to fulfill its role as a keystone predator on the landscape scale.

Here is a letter I recently submitted to the La Grande Observer that was published:

The Oregon Wolf Plan (OWP) has provided the opportunity for communication about the return of wolves to Oregon in a respectful environment, while the wolves are being managed in a respectful way as well. I am very thankful for that space as some people have been clear that they only want to kill wolves. The OWP has guarded all of us from this emotional reaction that would have pre-empted any chance at a meaningful discussion. I think that for many people the concept of persecuting a just returned native wildlife species that lived here for tens of thousands of years is just plain wrong. Some folks take pride in being third and fourth generation Oregonians, like myself. How many generations of wolves lived here? I for one accept and desire that there be wild places and wildlife with the associated risks.

Personally, I am impressed by the small number of livestock that wolves have taken considering how prevalent livestock is on the landscape. While the media makes a big deal about any wolf depredation, it doesn’t change the fact that wolves far and away favor wild prey. When individual wolves cross the line too many times and all non-lethal measures have been exhausted, the OWP allows for their removal, such as the two 11-month old wolves near Keating.

The OWP helped us get ahead of the curve on the return of wolves. I don’t know of anyone who would disagree that it’s better to be prepared for upcoming change than unprepared. Now the Plan is up for its 5-year evaluation and review with a public comment period. A very vocal few will push for a return to the dark ages when we exterminated wolves from our State. This prejudice against wolves is of mythical proportions considering even “man’s best friend” kills far more livestock than wolves, but that’s just the “cost of doing business.” I don’t just want domestic dogs; I want the “real McCoy!” I strongly encourage anyone in favor of living with native wildlife to write comments in favor of wolves and their strong, continued protection under Oregon’s Wolf Plan.
I now ask that ODFW drafts clear steps for non-lethal actions into the Oregon Wolf Plan. There needs to be a clear outline of steps to take to deter wolves with non-lethal measures. I ask that non-lethal measures be undertaken in a cohesive way, working with all ranchers in wolf country to improve their ranching practices so that wolf/livestock interactions can be minimized.

For me personally, when I look at the Hells Canyon Wallowa Mountains ecosystem, I have a hard time not seeing wolves inhabiting them. The habitat is good and available, there are large swaths of remote and rugged backcountry, and we are well connected to even larger wildlands next door in Idaho. While some species like the wolf comes with more baggage than others, we are incredibly lucky to be connected to the largest intact ecosystem in the lower 48, the Northern Rockies, as we see benefits with the moose, lynx, wolverine and others. And these larger organisms are indicators of a landscape health that exists at many smaller scales too. Otherwise the larger organisms simply couldn’t exist here.

Please make sure that the Oregon Wolf Plan represents the vast majority of Oregonians whom are thrilled about the return of wolves. It is only a very small minority that have a financial reason to dislike wolves. At some point these people need to adapt to changes, just like every other profession has to. Field studies are documenting the positive effects of wolves and other keystone predators on biodiversity. This is a very powerful finding, and society has a major stake in biodiversity conservation. While some question the cost of restoring the wolf population, I ask the opposite question. What is the cost of not restoring this keystone predator to our ecosystem?

David Mildrexler,
1302 Cedar St.
La Grande, Oregon. 97850
From: David Schaefer [drd823@gmail.com]
Sent: Wednesday, June 30, 2010 3:52 PM
To: ODFW.comments@state.or.us; cdwarnok@eoni.com
Subject: Comments on OR Wolf Management Plan
Attachments: wolf plan.doc

June 29, 2010

To Oregon Fish & Wildlife Commission

I am writing to comment on the Oregon Wolf management plan and its current defects. I agree with the Oregon Cattlemans request for changes to the Oregon Wolf Conservation Plan as submitted by Rod Childers. In particular I want to address their proposal that Wildlife Services be the agency to confirm livestock kills. Our veterinary clinic has examined 4 of the suspected calf kills in our county.

ODFW has not agreed with Wildlife Services on the confirmation of 3 of the 4 kills. In one case, ODFW determined that a calf had been dead for 4 to 5 days and therefore the wolves were not the cause of death. The rancher said the animal could not have been dead for that amount of time as he had seen the animals a few days prior. Our necropsy examination revealed that the carcass was not markedly autolyzed and there was evidence of hemorrhage in the skull confirming that the animal was alive when it suffered the trauma. This was confirmed by histopathologic examination. There were also bite marks in the skin of a leg and bruising in the bone below the wounds. We confirmed the bone lesions were pre-mortem lesions via histopathology also. Wildlife Services called this a wolf kill due to the bite marks. Our issue is that ODFW did not recognize the lesions (which were more difficult to see when we examined the carcass 2 days later) and misdiagnosed the amount of time the animal was dead. Histopathology confirmed that the animal was dead for less than 2 days.

Another case that we examined was unable to be determined to be a wolf kill. We were presented the frozen carcass of the suspected calf case and it took 2 days to thaw the animal for examination. The freezing compromised the tissues to the point they were of no diagnostic value to the pathologists. We saw lesions in photographs that made us suspect they were areas of trauma but the carcass was dissected to the point we could not find the lesions to determine if they were due to trauma. Understand that wolves eat most of the evidence of their causing the death of an animal. One is usually looking for very small changes in the carcass to find evidence of wolf attack and the carcass must be handled properly to preserve the evidence.

The 2 other cases we examined were performed in the presence of both ODFW and Wildlife Services. One case was confirmed to be a wolf kill by both agencies. The other case was listed as a possible wolf kill by ODFW. The wolves had eaten so much of the critical areas of the calf that it could not be determined to be a wolf kill.

In the predation cases in our county ODFW and Wildlife Services have not agreed on the confirmation of wolf kills. We understand that the wolf eats much of the evidence. However, Wildlife Services appears to us to have made the correct determinations from a scientific basis. It seems to me that ODFW has a conflict of interest in being the agency that is responsible to ensure the growth of the wolf population yet also has the control to make the determination of wolf predation and therefore is the agency that determines if wolves are to be destroyed.

The issue of proper determination of wolf predation is critical to not only the management of the wolf population but the survival of the livestock industry in areas that have wolves. Ranchers will lose cattle to wolves and will never be reimbursed for them, because they will not be able to be confirmed as a wolf kill and because there is nothing in the Oregon Wolf plan to compensate ranchers for their losses. The plan should include not only losses due to predation from wolves but also to compensate ranchers for the loss due to decreased conception rates and increased feed costs from lower body weights of cows due to stress from wolves.
Finally, I believe it is important to note that the cattlemen are not requesting the removal of all wolves in Oregon. They are working to find a way to continue to make a living while they co-exist with wolves in the state. Their requests for changes to the regulations regarding the use of lethal force on wolves will not result in the elimination of all wolves but rather give ranchers a continuing to make a living raising cattle.

David Schaefer DVM, MS

-- drdave@gocougs.wsu.edu
Please support an effort to improve the protection of the wolf population by considering the following:

a. Increase the requirements for taking wolves off of the endangered species list

b. Require the removal of animal carcasses of non-wolf killed livestock

c. Remove the authorization for the killing of wolves not in the act of attacking livestock

When considered together and further, implemented together, these steps represent a thoughtful and humane approach for now and the future.

Thank you,

Dennis Clemmens
Resident State of Oregon
Wolves were extirpated in 1946. Humans are doing it again and employees of the Oregon Department of Fish and Wildlife are enthusiastic partners in the tragedy.

It appears that there are no wildlife biologists employed by the Oregon Department of Fish and Wildlife. If there were there would be no wolf slaughter.

All healthy ungulate populations require a major predator. High school science classes teach this.

Please make your decisions based on best science. Do not let the bumper stickers posted by ignorant people determine how you spend tax dollars.

Dick Artley, retired Forest Service wildlife biologist.

Thank you.

Dick Artley
415 NE 2nd
Grangeville, ID 83530
US
hello odfw it is my understanding that the 5 year public review for the wolf plan is currently happening. i would like to voice my support for a fully funded wolf plan- after learning about the wolf human experiences in minnesota i see no reason for oregon to have anything less than a meaningful and sustainable recovery. based on the info coming out of yellowstone about the role of top predators i feel we can not afford not to have this important member of our ecosystem. thank you dwayne hedstrom 4914 n. albina portland oregon 97217
Christina A Schmidt

From: ODFW Commission
Sent: Wednesday, June 02, 2010 10:10 AM
To: Michelle Tate
Subject: FW: wolves

For Commission. – Teri Kucera

Michael Labrecque

From: michael labrecque [mailto:mlab59@yahoo.com]
Sent: Monday, May 31, 2010 9:19 PM
To: ODFW Commission; ODFW Commission
Subject: wolves

dthis is wrong to shoot those wolves what about wolf haven in washington
shoot them because they are survivors? wrong !!!!
Christopher P Schubothe

From: Elizabeth Enslin [liz@elizabethenslin.com]
Sent: Wednesday, June 30, 2010 7:04 AM
To: ODFW.Comments@state.or.us
Subject: Wolf Plan comments

Dear ODFW:

As a part-time resident of northeastern Oregon, I'm writing to comment on the Wolf Plan currently up for review.

I am an aspiring farmer in Wallowa County and I sympathize with ranchers who are trying to make a living. I know what it's like to face one more challenge on top of so many others. Many people living in urban areas don't understand how hard it is to produce food, what risks and losses are involved. Farmers and ranchers understandably lose patience with the naivete and ignorance of urban, I-5 corridor folk, so they're vulnerable to rumor-mongering from political groups and local media.

That's why we need a strong Wolf Plan based on science and not subject to the whims or hysteria of political interest groups on either side. And we need education and economic incentives both for ranchers and the general public.

The Wolf Plan must be based on the most current research in wildlife biology, particularly studies that show the ideal population size for ensuring continuity and stability. This should be the backbone of the plan and should be non-negotiable. It must stand strong against political interests that will try to chip away at it until the science is no longer recognizable.

Current practices of killing random individuals before packs have a chance to establish may actually increase predation. It's also a hideous nod to the wild west attitude that caters to extremists but has no basis in science. Political pressure from powerful lobbying groups should not have the power to undermine science as the foundation of the Plan. This would be a gross misuse of taxpayer dollars and confidence.

Given the vulnerable political and biological status of wolves, there must be clear steps for various non-lethal actions before any decision to kill wolves can be made. And these steps must be made across a wide geographical area where wolves are present. Burying carcasses on one ranch where a calf has been taken, but not on the ranch next door, is not enough. All carcass piles in the area must be buried. This should be clearly laid out (based on current scientific understandings of wolf behavior) and non-negotiable. And then ODFW must follow the Plan rather than bowing to local pressure for retribution killings.
I expect the government I pay taxes to to play a strong role in protecting ecosystems and common resources on behalf of all citizens and the generations to come. And I expect the Wolf Plan to hold us all, including ranchers, accountable for the challenges involved in returning wolves to their place in our ecosystems. Powerful political organizations that lobby on behalf of the cattle industry will cry foul on any attempt to “limit freedom” or “allow government interference.” Tough. Many property owners must undergo scrutiny and take responsibility for their stewardship of common resources and ecosystems. This is as it should be. It is part of our duty as citizens, and cattle ranchers, like everyone else, should not be exempt from it. I gladly embrace this responsibility though it leads to some restrictions on my freedom and entails time and money. For example, although I really want some milk goats on my farm, I choose not to have them because I don't want to pass diseases onto bighorn sheep. And my partner and I spend many hours doing our best to eliminate invasive weeds so they don't spread. Likewise, we fence off our springs and ponds so that cattle can't get into them.

The Wolf Plan should include provisions for education. Ranchers are right: many urban folk tend to romanticize wolves, demonize ranchers and underestimate the challenges of living on the front line of wolf recovery. Wolf advocates are also right: some ranchers demonize wolves and environmentalists and try to make wolf recovery an urban-rural wedge issue. Without addressing the ignorance on both sides, wolf recovery will be an ongoing battle out of all proportion to the number of actual wolves in Oregon.

Ranchers should be educated, of course, in non-lethal methods. They should also be educated in economic opportunities that come with co-existence (e.g., predator friendly certification, wolf tourism, improved ecosystem health). The best way to counteract local hysteria and slanted media coverage around wolves is to showcase ranchers who are putting non-lethal methods to good use and ranchers who are committed to co-existence.

Finally, I'd like to point out that ranchers are not the only ones with an economic interest in wolf recovery. As a landower in Wallowa County, I see benefits to having wolves return to the ecosystem. It could save me $10,000 to 20,000 on buck and pole fencing around each aspen stand on my land. Studies in Yellowstone show that the presence of wolf packs reduces elk and deer grazing in aspen stands. In much of Eastern Oregon (including Zumwalt Prairie, which now has the largest known pack of wolves), aspen restoration is a high priority but requires lots of money and lots of work.

Wolf tourism and agro-tourism are growing in popularity. In small communities in Eastern Oregon, these can go hand in hand to draw visitors to economically-depressed rural areas. People are willing to spend a lot of money to see wild wolves, to meet farmers and ranchers who are trying to co-exist with them, and to learn about the
challenges and benefits. Wolf tourism and agro-tourism could provide learning opportunities and cultural exchanges that help overcome the rural-urban divide and also give real economic benefits to rural communities. Unfortunately, the anti-wolf hysteria dominating the conversations and media in Eastern Oregon right now may drive some visitors away. This may have a substantial, but largely invisible, economic impact on those of us who are quietly trying to do something a bit different.

Thank you for taking the time to read this. I hope these comments attached to my name will remain confidential among those revising The Wolf Plan. If not, then please contact me before making my name public. My position is not, as you can imagine, a popular one out here.

Sincerely,

Elizabeth Enslin
Part-time resident
North End of Wallowa County
(local address available upon request)
Please protect the wolves in Oregon! Allow them time to renew a healthy population. What beautiful animals!

Thank you for your consideration.

Ellen Holtman
316 Sunset Road
Salem, VA 24153
US
I'm really upset to hear that a progressive state like Oregon seems so eager to gun down its few wolves and I do mean few. How can your Wolf Conservation and Management Plan talk about co-existing with wolves on the one hand, and then on the other calls for taking them off the Endangered Species List - are you kidding?? There are only 4 breeding pairs in the state, so how on earth can you justify taking them off the Endangered Species List. It's so sad that we seem to be repeating the same old, cruel history that we did in the 1930's. After almost every last wolf was killed in the lower 48 states, caring people worked really hard over the years to educate the public on how wonderful and intelligent wolves are and the importance of their presence in the ecosystem. Now, all that has gone by the wayside and we're back to the big, bad, wolf and people are hating them all over again. It really makes me sick. I really hope that the state of Oregon comes to its senses, and comes up with a management plan that puts killing them as the last resort and puts educating ranchers and the general public about how wolves serve a vital function in the ecosystem at the top of the list. Wolves are intelligent, family oriented beings and humans can live with them, if they only put a little compassion and effort into it.

Please bolster protection for wolves in Oregon through three primary measures:

1. Require the removal or destruction (i.e., rendering inedible) of the carcasses of non-wolf-killed livestock so that wolves are not attracted to areas with vulnerable stock. 
2. Eliminate the authorization for killing wolves not caught in the act of attacking livestock.
3. Raise the bar for consideration of taking wolves off the Oregon endangered species list, from the unsupportable number of four breeding pairs to a number reflecting the needed distribution within and outside the state to ensure Oregon's wolves' connectivity to wolves elsewhere and the wolves' genetic health.

The 2005 wolf plan is remiss in not requiring disposal of livestock carcasses. Far better to prevent conflict than to scapegoat wolves once they become habituated to domestic animals.

Allowing continued wolf "control" by federal hunters and trappers will forever prove a disincentive to truly seeking to prevent wolf/livestock conflict. It is also likely to prevent establishment of a viable wolf population in Oregon -- particularly as the state of Idaho proceeds to reduce its wolf numbers.

Scientists recognize that hundreds, if not thousands, of breeding animals are necessary to ensure long-term genetic health. Four breeding pairs is setting the bar way too low to consider state delisting.

Thank you for your consideration.

Gayle Janzen
11232 Dayton Ave N
Seattle, WA 98133
US
I am writing you today from a part of the United States that no longer has wolves, or any other top predator. We suffer with too many deer and too many lower echelon predators. The ecosystem is further damaged by a lack of diversity of plants, both in species and in age. The overpopulation of deer eat seedling trees and shrubs, wildflowers, even wading into wetlands to eat water plants.

I have often traveled to Oregon and admire your park systems and wilderness areas. I am, however, appalled with your wolf management plan. In the early centuries of our country we killed predators, largely out of ignorance, often with unfounded fear, this last particularly regarding wolves. Now, in 2010, along with the lessons of the past we have much more information, and should be making science-based decisions. Four breeding pairs in Oregon does not, scientifically, remove the wolf from the endangered species list!

Please come to sensible wolf management that allows these top predators to interact within Oregon ecosystems in a healthy and balanced way.

Thanks for your consideration of my comments.

Georgeanne Spates
11115 Main Bayview Road
Southold, NY 11971
USA
As an emeritus member of the American Institute of Biological Sciences (AIBS), I ask you to require removal or rendering inedible of carcasses of non-wolf-killed livestock, so wolves are not attracted to areas with vulnerable stock, & eliminate authorization for killing wolves not caught in the act of attacking livestock. The 2005 wolf plan is remiss in not requiring disposal of livestock carcasses. Far better to prevent conflict than to scapegoat wolves once they become habituated to domestic animals.

Allowing continued wolf "control" by federal hunters & trappers will forever prove a disincentive to seeking to prevent wolf/livestock conflict, preventing establishment of a viable wolf population in OR, particularly as the state of ID proceeds to reduce its wolf numbers. Wildlife biologists recognize that 100s, if not 1000s, of breeding animals are necessary to ensure long-term genetic health. 4 breeding pairs is ridiculously low to warrant state delisting.

Gerrit Crouse
38 4th Avenue
Nyack, NY 10960
US
Dear Sir/Madame,

As an Environmentalist, and as a Radio Talk Show Host, I am a big supporter of Environmental AND Wildlife CONSERVATION.

Stop the killing of wolves, and start to crack down on the indiscriminate, irresponsible cattle ranching that encroaches into our last remaining wild lands and taxpayer supported national parks.

Leave the Wolves alone, and bring eco-tourism into your state with the Wolves as the main attraction.

Let us start to live in tandem and harmony with nature.

In light of the horrendous oil tragedy, let us start to re-focus our energies onto conservation, preservation, and eco-friendly business practices.

Thank you.

Ginger Chapin
Conservation departments are supposed to work for hunters and fishermen and the public in general, not to provide subsidies to welfare ranchers. Wildlife populations do NOT suffer from predators, rather they become healthier. Wildlife populations DO suffer from the effects of welfare ranching on habitat. Do your job.

Harvey Reading
pb 551
Shoshoni, WY 82649
US
June 30, 2010

Dear ODFW,

Thank you for this opportunity to engage with the five-year review of the Oregon Wolf Plan. As you know, Hells Canyon Preservation Council (HCPC) was a member of the Wolf Advisory Committee convened to advise ODFW on the creation of a wolf management plan for Oregon, over 6 years ago. We have remained very involved with wolf issues in Oregon and throughout the west in the intervening period, and have watched with close interest as wolves started repopulating in Oregon, giving ODFW the opportunity to implement the landmark Oregon Wolf Plan.

Joining in these comments is the Oregon Natural Desert Association (ONDA), another organization with longstanding interests in Oregon wolf issues.

Much has changed in the five years since the adoption of the Wolf Plan—more than anyone predicted. We now have at least two packs of wolves in NE Oregon, and perhaps more elsewhere. In addition, wolf/livestock interactions have occurred much more frequently than we expected during this period. As a result, the precise language of the Wolf Plan and the associated administrative rules have been tested very thoroughly during this initial five-year period.

For context, let me remind you that HCPC has been a strong supporter of the Oregon Wolf Plan. While the Plan is certainly not what we would have written if we were drafting it alone, we do believe it is a balanced compromise between all the various interests involved in the wide-ranging issue of wolf recovery. But make no mistake, it is a fragile compromise. Our support of the Wolf Plan has no further room for movement. Should any key language be modified during this review process, it is a foreseeable consequence that support for the Wolf Plan from the conservation community will dissipate.

Thus, you will find that our suggestions do not address any core factors of the Wolf Plan, such as numbers of breeding pairs, the three-phase setup, or the general concepts of when lethal take can occur. Instead, we are suggesting specific language changes to address areas where the practical application of the Wolf Plan has shown that its language is not adequate to reach the intended result.

We note with some dismay that ODFW has jumped the gun and this week issued temporary rules that substantively change the Oregon Wolf Plan’s administrative rules. This action is disappointing at any level, but particularly so when done in a period during
which the Plan is open for public comments.

1. **Compensation**: We continue to support the concept of a compensation program, and understand that such a program would likely require legislative approval. We would encourage ODFW to examine the possibility of a compensation program that is not based on specific payments for depredations, but instead is a general subsidy paid to all livestock growers operating in wolf country. The subsidy approach would help compensate for the costs of non-lethal approaches and other expenses associated with operating in wolf country.

2. **Wildlife Services**: Based on what we have seen of the participation of Wildlife Services in Oregon wolf issues, we strongly recommend changes to clarify and reduce (or even eliminate) their role. On pages 32, 38, 45 & 47 of the Plan, there are specific references to Wildlife Services’ role. We recommend deleting the references to this agency, or at a minimum clarify that in all cases, ODFW is the lead agency.

3. **Translocation & Relocation**: We strongly recommend leaving these sections intact. If anything, they should be expanded to provide ODFW more authority in dealing with wolf conflict situations.

4. **Location Information**: On pages 46 and 74 of the Plan, there are allowances for providing landowners and livestock producers information on the location of wolves. We feel this language is much too vague, and should be limited to wolf locations near the landowner’s or producer’s property, while explicitly excluding denning and rendezvous sites.

5. **Economics**: The economics section should be updated to incorporate updated information on actual depredations experienced in other states with wolves overlapping with livestock productions. It should also be updated to include the important economic study showing that wolf-related tourism brings in $35 million to the Yellowstone area: Duffield et al., 2008. One piece of vital information missing from the economics section is the local economic impact of wolf management. ODFW has injected tens, if not hundreds, of thousands of dollars into the local and state economies through its wolf management program. It is important to include these easily quantifiable figures in the economic impacts section of the Plan.

6. **Backstop Language**: A fatal flaw of the Wolf Plan is that it contains no “backstop” language. On page 30 of the Plan there is set out a one-year monitoring effort that would take place if wolves decrease below the level at which delisting occurred. That one-year delay could be fatal to wolf populations, nor is there any proscribed action at the end of the monitoring period—a mere “status review” is the only step mandated if the population is below the delisting level. We find this process to be
too little, too late. We recommend backstop language that would automatically and immediately relist the wolves anytime their population decreases below the delisting level.

7. **Phase 1:**
   a. “In the area.” This phrase is used time and again in the Wolf Plan Administrative Rules. A good part of the recent dispute over the implementation of the Wolf Plan stems from vague language such as this. What does “in the area” mean? We recommend using more precise language, such as “an area not to exceed a radius of 3 miles from the current site of activity or depredation.”
   b. Under the non-lethal injurious OAR, there is the requirement that ODFW “consider the location of know den sites.” It is unclear what this means. Given that it would be entirely unreasonable to allow non-lethal injurious harassment around a den site, we recommend a clear prohibition on using non-lethal injurious harassment within a half-mile of a den site.
   c. The non-lethal non-injurious, caught-in-the-act and lethal take permits all require that “no unreasonable circumstances” existing prior to issuance of permits for these types of control. The Administrative Rules should be clarified to show how the absence of “unreasonable circumstances” must be verified prior to the issuance of the permits.
   d. The caught-in-the-act language would be more effective if it clarified how many woundings or attacks must occur before a permit can be issued.
   e. Before caught-in-the-act permits can be issued, ODFW must deem “efforts” to resolve the problem ineffective. The intent here is that non-lethal measures be tried first before resorting to lethal methods, so the rule should state exactly that—it should say “non-lethal efforts” rather than just “efforts.”
   f. We also find this entire “efforts to resolve the problem have been deemed ineffective” language to be problematic. It provides no guidance to ODFW or the public as to what measures must be attempted before resorting to lethal control. We feel it is incumbent upon ODFW and property owners/permittees to attempt both non-lethal non-injurious and non-lethal injurious efforts before and lethal authorization is given. The rules should state that both types of non-lethal measures must be attempted before lethal measures can be authorized. In addition, landowners should be required to document their non-lethal efforts, but the ineffectiveness call must be left to ODFW and made prior to the issuance of any lethal take authorization.
   g. Another concern with the caught-in-the-act language relates to OAR 635-110-0100(5)(a)(B), which allows “grazing permittees using public land” to use lethal force when authorized by ODFW. This should be clarified to limit any actions to the permit area of the permittee. As it stands, it is much too broad and could allow any public land permittee to shoot a wolf anywhere once given a permit. We suggest changing the language to “public land permittees on allotments for which they hold a permit.”
h. For lethal take permits, OAR 635-110-0010(6)(C) prevents their issuance when any "unreasonable conditions" exist to "cause" the wolf-livestock conflict. We note that there is discrepancy between this language and the original language of the Wolf Plan. The Wolf Plan, at p.43, applies the same criteria here as with the injurious non-lethal harassment and caught-in-the-act permits: that “No unreasonable conditions exist that are attracting wolf-livestock conflict.” Absent a compelling and substantiated justification for this departure from the Plan, the Rules should be amended to match the language of the Plan.

i. Finally, the lethal take permits have no geographic- or animal-specific scope to them. When all the prerequisites to issuing a lethal take permit have been met, there must be some limitations on that permit. For instance, if two wolves are chronically killing livestock, our goal should be to shoot those two wolves, not any two wolves. We suggest language that would limit the scope of a permit to the area in which the depredations are occurring, or, if specific animals can be identified, to those specific animals.

8. Phase II: In Phase II, landowners are “encouraged” to use non-lethal non-injurious methods first before resorting to non-lethal injurious methods. OAR 635-110-0020(3)(a). The use of the word “encouraged” lends no weight to the general goal of escalating control methods only after less invasive methods have failed. Moreover, the addition to the Rules of the word “encouraged” does not appear to have any foundation in the Plan itself. We request a change to this section to require a showing of failure of non-lethal non-injurious methods prior to using non-lethal injurious methods of control.

9. Phase III: In Phase III, an open hunt may be allowed to address ungulate populations below “management objectives.” See p. 45. Our concern is that ungulate management objectives may be unreasonably high for ungulate populations now sharing their habitat with wolves. There must be some relation of the management objectives to the carrying capacity of an ecosystem that now contains wolves.

10. The Temporary Rules: The Temporary Rules promulgated by ODFW on June 29, affecting subsection 6 of Rule 0010, are downright offensive when made during this public comment phase, with little or no justification, and with no notice or opportunity for public input. What makes the Oregon Wolf Plan a generally sound Plan is the public process at its foundation. Spontaneously redrafting the Rules to fit a particular set of circumstances is the antithesis of public decision-making. Public trust is required for the Wolf Plan to work, and the passing of these Temporary Rules have undermined that trust. Moreover, the new Rules rely on the vague “in the area” language that was already a red flag for us due to its overly broad nature. The goal of this review process should be to make the rules more clear, not less clear, yet these Temporary Rule changes make the rules much less clear and more vague.
They also weaken the Plan dramatically. ODFW has now expanded the scope of actions that are prerequisites to issuing lethal take permits from adjacent properties to properties in the same area, whatever that means. We are strongly opposed to both the way in which the Temporary Rules were promulgated, and the content of them!

11. Training & Standards: It was made abundantly clear over the last few months that there needs to be some quantifiable training of agents making depredations calls, along with a standardized format for conducting depredation investigations.

12. The Wolf Advisory Committee: We understand and support the desire of ODFW to keep this review to minor edits of the Wolf Plan. We note, however, that many suggestions made by other special interest groups are calling for wholesale changes to the Oregon Wolf Plan. In our view, any wholesale changes to the structure and content of the plan must not be made without reconvening the Wolf Advisory Committee and initiating a thorough public process. Specific issues that would trigger the need to reconvene the Wolf Advisory Committee include:

- Any change to the caught-in-the-act language or the requirements for a caught-in-the-act permit;
- Any change to the numbers of breeding pairs that trigger different phases of the Plan;
- Any change to the separate treatment of the east and west portions of the state;
- Establishment of any maximum numbers of wolves; and
- Establishment of “no wolf zones.”

Thank you for this opportunity to comment on the five-year review of the Oregon Wolf Plan. We look forward to participating closely with ODFW as the process moves forward.

Sincerely,

Greg Dyson,
Executive Director
Hells Canyon Preservation Council

and

Brent Fenty,
Executive Director
Oregon Natural Desert Association
Christopher P Schubothe

From: Illana bismuth [illana_fr@yahoo.fr]
Sent: Monday, July 05, 2010 4:59 AM
To: ODFW.Comments@state.or.us
Subject: Wolves management plan

Dear Sir,

As a wildlife specialist, I am registered in a list for Oregon wild and I 've just received a message from your non profit organization with "comments about Wolves in Oregon."

Actually I live in France, but we have the same troubles in the Alps where interactions between livestock and Wolves can breed people to kill them,

Some organizations and the Governement have developped a plan for cohabitation between ranchers and predators, which avoid some behaviour.

I would like to send you some explanations about that.

I am looking forward to your answer.

Sincerely yours

Illana BISMUTH.
Dear ODFW,

I am very concerned about the threat made by ODFW to our Oregon Wolves. It is unreasonable to shoot wolves because of cattle lost to them. The wolves should be protected. The ranchers can be reimbursed for their cattle loss expenses. There lives are worth more than money, and ranchers need to learn to live in harmony with nature.

I am a concerned Oregonian who supports the wild wolves in Oregon.

Please do not shoot the wolves for eating.

Sincerely,

jane frances bicquette
3291 NE Irving St
Portland, OR 97232
To Whom It May Concern:

I am writing to voice my support for maintaining a stable population of wolves in Oregon. I am confident that humans can both live and thrive in Oregon, just as they do in Minnesota.

I am also concerned with the recent kill order given and extended for two wolves (that is one-seventh of the population!) in clear violation to the OR Wolf Plan as it now stands. This order is a rash and unwise decision, especially in consideration of the unwillingness of parties involved to take any non-lethal actions.

Ranchers in Oregon, like those in Minnesota, are going to have to take more responsibility for their cattle and other livestock. It is possible to co-exist with wolves and that is what we should do. I encourage those concerned with this issue to look into non-lethal solutions that the people of Minnesota have come up with to not only support a population of approximately 3,000 wolves in their state, but also a thriving livestock business.

I urge you in drafting a new wolf plan to lay out unambiguous, non-lethal steps that must be taken before any lethal options are considered.

In addition, these non-lethal solutions must be taken across the landscape. Ranchers must work together to give these solutions a viable chance to succeed.

Finally, I would just like to note that top predators, like the wolf, are very important for a healthy ecosystem. Their absence negatively impacts everything from trees to birds to deer to fish to watersheds. Significant, scientific data now exists clearly showing the importance of wolves in an ecosystem and the devastation that occurs when they are absent.

I truly hope that Oregon will lead the West to a new day for wolves and humans, a new day that banishes all the myths, stereotypes, falsehoods and irrational hatreds of a creature that is, in reality, just doing what it can to survive. Let's not let prejudices control our decisions and let's not repeat the sad past. The wolf is at a crucial point in its survival. Rather than looking to drive it to extinction once again, we should be throwing it a life line. Domesticated he is our best friend; In the wild, he is (was?) our brother.

Thank you for your time and consideration.

Sincerely,

Jennifer Wolfsong

Beaverton, Oregon
Hello,

I don't believe it's fair or ethical to permit wolf kills on wolves which are simply preying on (slow)cattle in order to survive. Build a more secure cattle fence!

Jeremy Williams
Portland, OR
June 30, 2010

To Oregon Department of Fish and Wildlife,

Please accept these comments in regards to the five year review of the Oregon Wolf Conservation and Management Plan (“Oregon wolf plan”) on behalf of the Gifford Pinchot Task Force (Task Force). The Task Force is a non-profit organization with over 4,000 members who work to support the biological diversity and communities of the Northwest through conservation and restoration of forests, rivers, fish, and wildlife. The Task Force is excited that wolves are once again present in the state of Oregon and looks forward to the benefits that wolves will bring for the ecosystems and habitats of Oregon State in the years to come. We also recognize the challenging social dynamics that the return of wolves brings to our state and the need to promote education regarding predators. The Oregon wolf plan is an important tool for the conservation and management of wolves, and we hope that our comments will be reviewed and incorporated to ensure strong protections for a remerging native carnivore.

I. Wolves in the Pacific Northwest

Wolves are an important part of the Pacific Northwest ecosystem and have proven in other areas to be great companions to the restoration of our natural environment. We are supportive of the Oregon Department of Fish and Wildlife (ODFW) as they review the goals of the Oregon wolf plan after 5 years and look forward to the healthy management of wolves in Oregon. Two of the most important aspects of the plan that need prioritization are returning and managing a wolf populations to a self-sustaining level and developing a public understanding through education of the conservation and management needs of wolves.

Returning top predators to our ecosystem will invigorate the natural trophic cascades of the Pacific Northwest. Top predators, like wolves, are considered a keystone species among many biologists because these species control herbivore populations, which in turn affects many other aspects of the ecosystem from the growth of species on which herbivores browse to microclimate and soil changes. Protecting keystone species is considered a priority among conservation biologists worldwide because of the value they represent to the ecosystem (Primack 1998). At this early stage in the natural return of wolves to Oregon, conservation should be the number one priority of this plan.

The term trophic cascades originated in 1966 from experiments conducted by Robert T. Paine showing that predators have effects that permeate food webs from the top down (Ripple and Beschta 2005). In recent studies of various national parks Ripple and Beschta have been analyzing the loss of predator species and the effects this loss has on ecosystem health. In a 2005 study, Ripple and Beschta compiled historical data to compare timing of wolf kills and deer and elk explosions to evaluate temporal patterns and to consider predator and ungulate relations in the ecosystem (Ripple and Beschta 2005). They have found that with the return of wolves and top predators elsewhere elk herbivory has decreased which in turn has provided benefits to trophic levels below. For example, Ripple and Beschta
have described remerging streamside vegetation, which has created shaded pools sufficient for increased fish reproduction in addition to providing better habitat for beaver and streamside song birds. Ripple and Beschta concluded, “the removal of keystone predators effectively eliminated any wolf driven trophic cascades that had historically influenced elk numbers and foraging patterns, which, in turn, maintained a healthy distribution and structure of deciduous woody plant communities.” (Ripple and Beschta 2005).

The Task Force believes that wolves in the Pacific Northwest and Oregon specifically will benefit the ecosystem. Wolves help control deer and elk populations and grazing patterns, which provide streamside vegetation the chance to grow, shade streams, and produce increased fish habitat. In addition, wolves provide a natural means to control overpopulation of ungulate species which could in turn lead to healthier herds.

II. Wolf Conservation

Numbers and Distribution

Wolves continue to be listed as an Oregon endangered species despite the fact that they are no longer considered a federal endangered species in 2/3 of the state of Oregon. As an Oregon endangered species the state must conserve the wolf until it meets the requirements for delisting and the state “strive[s] to ensure that future relisting in unnecessary.” ORS 496.171. The Oregon Wolf Plan establishes 4 breeding pairs maintained for three years in Eastern Oregon as the qualification sufficient to delist wolves into the Phase II management if all other delisting criteria are met (Oregon Wolf Plan, page 19 and see page 15). Phase II has an objective of seven breeding pairs of wolves present in eastern Oregon for three consecutive years. Wolves in this phase will no longer be a listed species. These numbers are too low to create a wolf population that will not continually be threatened by extinction.

ODFW should focus on creating a self-sustaining population of wolves that are well connected to provide for adequate gene exchange. This would include ensuring that genetic exchange between subpopulations is high enough to promote long-term population stability. In a peer-review comment to Washington Department of Fish and Wildlife during Washington’s planning phase biologist Carlos Carroll stated that “[i]t is intuitive that larger populations are less at risk from extinction. This arises from several factors. Risk of extinction due to demographic stochasticity (for example, all offspring in a year are of one sex) decreases rapidly with increasing population size (Lande 1995). Risk from environmental stochasticity (for example, a series of years with little prey) decreases more slowly with population size (Lande 1995)” These observations also hold true in Oregon and ODFW should focus on conserving a large enough population of wolves in the state of Oregon that will not continually be at risk of extinction. ODFW’s current plan does not put a cap on the number of wolves to be managed for in Oregon, which is important to the recovery of this species in its native habitat, however the number breeding pairs before delisting is very low.

As stated briefly above, the recovery number arrived at during the Oregon wolf plan process is too low to adequately maintain a self sustaining wolf population in the state of Oregon. The Oregon recovery number is not scientifically defensible when reviewing current available population density science. Although we recognize that these breeding pair numbers are often arrived at for political and social means they are not in any way relevant to the adequate recovery of this species. Minimum numbers before delisting should be arrived at by using the best available and most current science in regards to population biology and wolf social dynamics.
ODFW should create a clear plan to maintaining connectivity between other source populations in Idaho, British Columbia, and Washington. Connectivity should be recognized as important component of this plan and there is little to no information presented in the plan on how ODFW intends to maintain connectivity or enhance connectivity to provide the necessary travel ways to sustain a population. ODFW needs to incorporate in this plan a means to ensure connectivity and safe passage for predator species before ODFW can or should rely on low population levels to sustain a healthy wolf population in Oregon. Until a suitable plan can be created that ensures connectivity between populations there is no justifiable evidence to have low breeding numbers.

In summary the plan’s delisting rule should be revised to be closer to the scientifically acceptable population levels by having a greater number of breeding pairs spread out over the state in several populations with connectivity between the larger populations in Idaho and British Columbia. Habitat restoration (road decommissioning, forest restoration) objectives should also be incorporated to fully provide for recovery needs of wolves in Oregon State.

Monitoring

We would like to see ODFW work more closely with other agencies and non-profits, to ensure that there is an adequate system in place to confirm or monitor wolf populations in the areas deemed most suitable for habitation. Additionally, ODFW needs to ensure adequate funding for this program. In the past 5 years the wolf plan has been woefully underfunded and lacks the means to adequate enforce any of the measures including monitoring and education. To adequately plan for and restore wolf populations, reliable information about their movements and habitat use is vital. Acquiring information on habitat use and travel is important to the overall connectivity goal. It is beneficial for ODFW to work with other agencies and non-profits to create a reliable documentation system and incorporate a well thought-out monitoring system in the plan itself.

Translocation

Translocation is a management tool currently included in the plan. We strongly believe that translocation should only be used as a last possible resort because of the complicated social and biological issues involved with its use.

First, wolves are social animals and require packs to survive. Translocating one wolf (or even several) to a region would not be a wise as it could actually decrease the number of wolves in Oregon by disrupting pack dynamics. In addition, because of the low target number of breeding pairs which the current plan aims to achieve, relocation could actually hamper recovery efforts because not enough wolves would remain in one place to maintain a stable and healthy population.

Second, relocating wolves to new areas rather than allowing them to recover naturally adds to the social unrest and intolerance that will already be present in many small communities. Allowing wolves to return on their own gives communities time to build support and understanding for the process and is easier for many to accept than the idea that the state is forcing an “unwanted” predator on them, which is likely how it would otherwise be portrayed.

Any translocation activity would of course call for an intensive education campaign within the affected communities before translocation occurs. We believe the presence of wolves could bring many ecological and economic benefits to local communities, and these types of positive effects as well as typical fears and concerns should be incorporated in such education efforts.
III. Wolf-Livestock Conflicts

As much of the debate over wolf-livestock conflicts is informed by Yellowstone’s wolf reintroduction, we would like to first note that depredation of livestock by Yellowstone wolves was found to not have a negative effect on the livestock industry on the whole. However, there was an uneven effect causing some livestock owners to be more adversely affected than others (White et al. 2005). Given this fact, we would like to ensure that livestock owners are given adequate incentives to protect their livestock from wolves in order to avoid lethal methods of managing wolves.

We support proactive measures and modified husbandry practices as an alternative to lethal wolf control. The use of range riders and herders as well as husbandry practices such as delaying turnout of cattle during calving should be strongly advocated by the plan to avoid depredation by wolves. Educating livestock owners and providing some monetary help for use of proactive measures should be included in the plan. Education tools and communication plans should be adequately funded to ensure the most effective measures are in place.

We do understand that even with preventative measures, wolf depredation can be costly to some livestock owners, thus, we support a compensation program that is fair. The Plan should emphasize that compensation will only be used when proper husbandry practices have been in place to prevent wolf-livestock conflict from occurring. The current language is too soft to guarantee efforts are made to prevent wolf-livestock conflict.

Although we support a fair compensation program for livestock handlers we are opposed to lethal take by livestock owners by shooting wolves in the act of attacking in the threatened and endangered phase of the state program because of the potential for abuse of the system. Although we recognize that this provision can provide livestock owners with a sense of protection, the provision is simply too easy to abuse and too difficult to monitor. The plan does not include any provision to ensure prosecution of an offender if a wolf is shot when not in the actual act of killing livestock nor does it stipulate the penalties for illegally shooting wolves. Any removal of wolves that necessitates killing should be done by professional biologists in the employ of Oregon State.

IV. Wolf Interactions with Ungulates and Non-prey Species

Although, as the management plan suggests, the effects of wolf introduction on ungulate prey, particularly elk, is unique to each ecological system, there is strong evidence that wolves will have a beneficial relationship with the ecosystem. As mentioned above, numerous studies have shown that wolves serve as a top down regulatory factor which may in turn have a restorative effect on vegetation and thus many other ecosystem interactions and processes. Wolves control elk through “the ecology of fear” or cause them to change their behavior in other ways. Either way, there is a clear effect on the lower trophic levels. Based on the latest research on wolves, the Task Force believes that population and behavior control of elk behavior by wolves would have significant ecological and economic benefits (to agricultural land and forest owners) in this area.

According to the Plan, ODFW will consider reducing wolf abundance in localized areas with at risk ungulate populations if research has determined that wolf predation is a key limiting factor for the ungulate population (Oregon wolf plan, page 58). We would like to see the Oregon wolf plan consider a more detailed analysis of when reduction of wolves would be appropriate. For example what would constitute a severely depressed elk population? These are important points to consider as there are
varying degrees of understanding among the public in regards to appropriate management objectives for ungulate species.

ODFW should consider holding public meetings to discuss relocating or lethal take of wolves prior to authorizing take to provide the public with an opportunity to comment on the issues presented when it is doing so to protect elk and deer populations.

V. Education and Research

We support the strong commitment that ODFW is making to education and outreach efforts. Their proactive approach to these efforts will help reach a broad array of the public and provide necessary information that is essential to the recovery of wolves in Oregon. The Task Force would like to see ODFW fund more positive education in rural areas and to see the education program fully funded.

The ODFW should include more focused education about wolves and the benefits they provide to our ecosystem as part of the plan. We strongly support ODFW’s intentions to make education a top priority, but education should not be solely focused on the management needs. The public should be given the opportunity to learn about the unique characteristics that top predators provide for our ecosystems in order to create more social acceptance of wolves. Increased tolerance would of course ease the challenges involved in ODFW’s management role. We would like ODFW to include on their website and as part of their intended education tools (pamphlets, letters, lectures) a clear and concise section educating the public about the emerging evidence of top predators’ benefits for ecosystem recovery.

We are also pleased to see that research is considered a vital part of this plan. Both small and large non-profit organizations can provide essential service by monitoring specific areas through an array of programs. The Task Force, for example, is currently beginning a research project in coordination with the Forest Service on the Gifford Pinchot National Forest using remote cameras to monitor for rare carnivores. We would hope that ODFW would consider partnerships with other non-profit organizations that can provide similar or related services in this important endeavor.

VI. Conclusion

The Task Force thanks you for the research, dedication, and time you have put into this very thorough plan. We hope that with a solid plan in place Oregon will soon see the benefits of having a top predator restored to its ecosystems. If you have any questions regarding the comments submitted above please do not hesitate to contact me at 503 221-2102 ext. 101 or Jessica@gptaskforce.org.

Thank you,

Jessica Walz
Conservation Director


Dear Sir or Madam:

We are writing today in support of a ban on wolf control by killing and trapping. Instead please develop a target for our Oregon wolf population that will achieve scientifically supportable wolf numbers and the distribution of viable packs.

When scientists agree that thousands of breeding animals are necessary to ensure long-term genetic health, allowing for only four breeding pairs is far too few a number to consider taking Oregon wolves off the state endangered species list.

Several optional and humane solutions include requiring the removal of non-wolf-killed livestock carcasses so that they don’t attract wolves to areas with vulnerable livestock. It is our understanding that the 2005 wolf plan does not require disposal of livestock carcasses. Please incorporate this simple solution into future plans. Wolves, as well as many other wildlife species, will eat dead livestock they come across and this practice only serves to habituate them to domestic animals rather than hunt in the wild.

Also please eliminate the authorization for killing wolves not caught in the act of attacking livestock. Continuing this inhumane and unnecessary wolf “control” by federal hunters and trappers only serves to provide a disincentive to seeking a real solution to wolf/livestock conflict. And it adds to the possibility of preventing the establishment of a viable wolf population in Oregon.

On another note, we support environmental diversity and wish to see less of our public lands serve the cattle industry. As is now scientifically proven the raising and slaughtering of livestock pollutes our air and water, the consumption of meat products causes obesity and disease, and meat production facilities are inhumane environments for both human workers and the animals they slaughter.

Respectfully,

Jim and Linda Figurski

Lake Oswego, Oregon
Hello ODFW,

I strongly urge you to work toward integrating wild wolves back into Oregon's ecosystem. The ecological imbalance caused by the absence of wolves interacting with ungulates and other fauna causes long-term damage to Oregon. Our wolf management plan must not allow Oregon wolves to be killed for the unjustifiable purpose of improving profits for ranchers. We should integrate wild wolves back into our ecosystem for the long-term benefit of all.

Regards,
Jon Lahr
Please leave wolves alone. They are no different from any other "predatory" animal, uncluding man. We do anything we want and can to survive, and we consider that "justifiable." Yet, when any other animal does the same thing, we call them "pests," and "vermin." How one sided and unfair and pathetic.

Wolves do no more harm than any other predator and have as much right to be here as we do. The number of livestock actually killed by wolves every year is almost non-extistant and is negligible. Our killing them is just knee-jerk reactionary nonsense. They are an important part of the wild environment and need to be there.

Your job is to protect and look after wildlife and the wild lands, not to judge them and kill them for just being what they are: wild animals. Your job is to work with cattle men and ranchers to work out a deal that is suitable for both them AND the wild animal(s) they have a complaint with. Your job, finally, is to represent the people of this country, most, of whom, WANT wolves to be there in the wild.

A breeding pair of wolves is extremetly important to the health of the wolf population. I urge you to stop the wolf hunting and start managing things in a more responsible and less violent amd destructive way.

Please bolster protection for wolves in Oregon through three primary measures:

1. Require the removal or destruction (i.e., rendering inedible) of the carcasses of non-wolf-killed livestock so that wolves are not attracted to areas with vulnerable stock.
2. Eliminate the authorization for killing wolves not caught in the act of attacking livestock.
3. Raise the bar for consideration of taking wolves off the Oregon endangered species list, from the unsupportable number of four breeding pairs to a number reflecting the needed distribution within and outside the state to ensure Oregon's wolves' connectivity to wolves elsewhere and the wolves' genetic health.

The 2005 wolf plan is remiss in not requiring disposal of livestock carcasses. Far better to prevent conflict than to scapegoat wolves once they become habituated to domestic animals.

Allowing continued wolf "control" by federal hunters and trappers will forever prove a disincentive to truly seeking to prevent wolf/livestock conflict. It is also likely to prevent establishment of a viable wolf population in Oregon -- particularly as the state of Idaho proceeds to reduce its wolf numbers.

Scientists recognize that hundreds, if not thousands, of breeding animals are necessary to ensure long-term genetic health. Four breeding pairs is setting the bar way too low to consider state delisting.

Thank you for your consideration.

Joseph Collins
101-41 124th St.
Queens, NY 11419
USA
Please bolster protection for wolves in Oregon through three primary measures:

1. Require the removal or destruction (i.e., rendering inedible) of the carcasses of non-wolf-killed livestock so that wolves are not attracted to areas with vulnerable stock.
2. Eliminate the authorization for killing wolves not caught in the act of attacking livestock.
3. Raise the bar for consideration of taking wolves off the Oregon endangered species list, from the unsupportable number of four breeding pairs to a number reflecting the needed distribution within and outside the state to ensure Oregon's wolves' connectivity to wolves elsewhere and the wolves' genetic health.

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Allowing continued wolf "control" by federal hunters and trappers will forever prove a disincentive to truly seeking to prevent wolf/livestock conflict. It is also likely to prevent establishment of a viable wolf population in Oregon -- particularly as the state of Idaho proceeds to reduce its wolf numbers.

Scientists recognize that hundreds, if not thousands, of breeding animals are necessary to ensure long-term genetic health. Four breeding pairs is setting the bar way too low to consider state delisting.

Oregon's Imnaha Pack of gray wolves deserve a chance to thrive in their habitat. If you take the measures discussed in this memo, you will ensure that these gray wolves will survive for many, many generations to come. And furthermore, there needs to be a reorganization of who is in control of harnessing in the number of wolves in Oregon....HOW CAN FEDERAL HUNTERS AND TRAPPERS BE AT THE CONTROLS WHEN THEY ARE THE ONES WHO HAVE AN INTEREST--BE IT RECREATIONAL OR MONETARY TO THIN THE "HERD" SO TO SPEAK OF THE VERY FRAGILE IMNAHA PACK OF GRAY WOLVES. THIS CONTROL GROUP IS NOT IN THE BEST INTEREST OF THE WOLVES. A TOTALLY INDEPENDENT GROUP, WITH INPUT FROM HUNTERS AND TRAPPERS, SHOULD BE ESTABLISHED TO MAKE SURE THAT WHAT HAPPENS TO THE WOLVES GOING FORWARD IS FAIR AND IN THE BEST INTEREST OF THE WOLVES IN OREGON AND IN THE LONG RUN THE BEST FOR THE STATE OF OREGON.

Thank you for your consideration.

Jude MacPherson
903 Ginger Court
Mount Laurel, NJ 08054
US
Dear ODFW,

I submitted the following comments on June 30th to your e-mail address, and received an "Out of Office" reply. Please make sure that my comments on the Oregon Wolf Management Plan have been forwarded to the appropriate committee for review.

Thank you,

Judy Hall Goodman

Oregon Dept. of Fish & Wildlife
3406 Cherry Ave. NE
Salem, OR 97303

June 30, 2010

Dear ODFW,

The residents of Wallowa County are beginning to understand and experience wolves for the first time. I have great empathy for the rancher in the 21st century who does not want change, and who view the wolf and the government agencies that manage it a threat to their livelihood and way of existence. How can the modern day rancher co-exist with a top predator like the wolf, a predator that was once exterminated by their ancestors?

I moved to Joseph, OR about 9 months ago from Central Idaho (Stanley). I had lived on a ranch (the H-Hook Ranch) about 20 miles south of Stanley, Idaho for approximately 15 years (1991-2006). From 1995, when wolves were first re-introduced into the Frank Church River of No Return Wilderness until I moved to Sun Valley in 2006, 4 different wolf packs denned within 2 miles of my home on the H-Hook Ranch (a consolidation of Fourth of July Creek Ranch, the Champion Creek Ranch, and the Laverty Ranch). The wolf packs were The Whitehawk Pack, The Stanley Basin Pack, The White Clouds Pack, and the Galena Pack.

This was a working cattle ranch, however the ‘home ranch’ where the cows spent the winters and calved was in Payette, Idaho. So we are talking about summer range in the Sawtooths. Idaho does not have the understory as does northeastern Oregon, and I could see literally for miles from my kitchen & living room windows 2 different mountain ranges that bordered both sides of the Salmon River. This made the routine of tracking radio-collared wolves fairly easy. An Omni-antennae mounted on top of the house allowed a 360 degree scan and line of sight of up to 5 miles in any direction. I would monitor radio-collared wolves frequently (several times a day) using the Omni-antennae, and then I used a directional antennae to determine a more precise direction. The Omni-antennae was loaned to me by the Defenders of Wildlife, and the receiver and handheld antennae were loaned to me by the Nez Perce Tribe.

By trade, I have a Masters of Science degree in Biology, and I have about 25 years experience working in Anadromous Fisheries research in Idaho and in Washington for state and federal
agencies. As a caretaker of a cattle ranch (and as a biologist), I was forced to view both sides of the wolf issue (for wolves or against wolves). As a result, I developed an unbiased attitude towards the wolf. Simply put, the wolves weren’t going away. They had found good habitat to den and rendezvous, and so we had to find a way to live with wolves. The ranch could not have done what they did however without the support of the US Fish & Wildlife Service (Carter Niemeyer), Wildlife Services (Rick Williamson & Jeff Ashmead), the Nez Perce Tribe (Curt Mack, Isaac Babcock & Jim Holyan), and Defenders of Wildlife (Suzanne Stone). All of the agencies provided the ranch with guidance in dealing with bad wolves, how to minimize wolf-livestock encounters, how to deal with depredations, and also provided the ranch with the tools necessary such as RAG boxes, Fladry, radio tracking receivers and antennas, cracker shells, bean bags and rubber bullets, and cell phone numbers to reach someone even on the weekends. We operated under the 10-j Ruling: we could “take” wolves in the act of “killing” livestock (livestock defined as horses, cattle, and sheep). This did not include chickens, llamas, domestic dogs, etc.. I felt the most important tool was the radio tracking equipment. The radio tracking allowed me to keep tabs on the collared wolves, and I could tell when they were closer to the cattle, even at night I recall effectively hazing wolves in the dark using the directional antenna and cracker shells aimed in their direction. Quite often, the wolves were too close and hazing only caused them to run towards the house rather than away when the cracker shell exploded over their heads, and other times the grass was too dry in late summer to use cracker shells so we had to resort to lead pellets as a noise maker. I used to keep a journal/notebook of signals & frequencies, and observations. These became helpful over the years when ‘figuring out’ a pattern to the packs behavior. Usually the wolves would leave the area in December and January to follow elk herds to winter range, and return sometime around mid-February when the female wolves were in estrous. I would often see tiny droplets of blood and wolf tracks on my ski trail. I would also see more lone male wolves traveling through that time of year searching for a mate, or a young wolf that has dispersed from it’s pack and was relocating. After mating the wolves would still roam following elk, antelope and deer that were slowly starting to move up to the valley where they would calve. The wolves seemed to be pretty mobile until the female was ready to den and then the wolves would return to the forest close to the ranch to den. This always occurred on or around April 9th. The alpha pair would stay pretty close to the den once the puppies were born, and I would only see the male out hunting. After the pups were mobile around mid-June, the female would move them to another location usually further from the ranch. The yearling wolves being kicked out of the pack were the trouble makers.

The wolves didn’t really cause much of a problem for us. I only lost one chicken over 10 years to a yearling wolf – the wolf came back the next day walking within 20’ of my front porch where I stood with my daughter. I hazed the wolf and it never came back. My dog had a few close encounters with wolves, but there was never any contact – the wolves were either interested in something else, or my dog was close enough to me that I could contain her. The ranch suffered maybe one depredation a year, but the cowboys changed a few of their strategies to minimize wolf-livestock conflicts. For instance:

They delayed bringing the new calves up from the home ranch in Payette by a couple of weeks, giving the calves a chance to grow a little bit bigger
If the wolves were denned on one part of the allotment, they started grazing the cows at the other end
In some cases they delayed turning cows out onto the forest service allotment until the wolf pups were larger and able to travel... sometimes the disturbance of the cows and people would then cause the wolves to move
Trapping and radio-collaring older wolves in the pack would sometimes cause the whole pack to move. It was enough of a disturbance to make them leave the area, and move further away from
The cowboys would move the cows more often, rotating them to the various forest service sections. The cowboys would check the cows more frequently, especially if the radio-tracking detected the presence of wolves.

Depredations on our ranch usually occurred in September (probably because during the summer sheep were easier prey grazing through the valley (ie., Faulkner). Mid-September would be the time Defenders would come and hang the fladry on the ranch, and Wildlife Services would set up the RAG boxes in what came to be known as “the killing field” where most of our depredations occurred (but RAG boxes are only effective on collared wolves that set them off). If the Alpha male was removed (lethally) as was the case with the White Cloud pack, the entire pack dispersed from the area and they were not seen for months.

I have a short summary that Carter Niemeyer (USFWS) wrote up on the effectiveness of RAG boxes on the ranch.

From my experience, I felt that the H-Hook Ranch was somewhat ‘progressive’ in that the owners, cowboys & caretakers took a more ‘pro-active’ approach to minimizing wolf-livestock encounters. The first thing we did was haze them... making them afraid of people and afraid of being near the buildings. The cowboys made more of a presence on the grazing allotments, riding or 4-wheeling through the cows more often too.

We did have problems with the Boulder White Cloud Coalition (Lynn Stone), and Western Watersheds (Jon Marvel). These environmental groups scrutinized the ranch because we were allowing Wildlife Services to trap wolves on the ranch. The trapping came under the 10-J ruling that a few individual wolves had been involved in killing sheep. Efforts to catch and collar the suspects were interfered by ‘someone’ – traps were tripped, and the White Cloud Coalition even set up a roadblock at one point so the trappers could not check their traps. This group was also responsible for trespassing on the ranch and also aerial surveillance with video crews to get a shot of a wolf in a trap. I truly felt ‘invaded’ by these people. I am sure that they felt they were acting as guardians of the wolves, but in my opinion, their interference only delayed the work of the Wildlife Service Agents from getting collars on the wolves, and inevitably the wolves had more time to continue killing sheep. The 10J ruling stated that every attempt would be made by the agencies to trap, collar or relocate problem wolves following the first and second incidences. After the third incidence, they would get a lethal sentence. The other option under the 10J ruling that the rancher (and caretaker as an agent of the private landowner) had in Idaho was to kill a wolf if it was caught in the act of killing livestock (cattle or horses, not dogs or chickens), and if it was on private land (not federal or state lands). You had better be prepared to prove that the wolf was in fact in the act of killing if you were to shoot one. Oregon ranchers do not have this option. I would like to see this changed in the current wolf management plan, however I believe that the agency (ODFW) and USFWS should make a concerted effort to radio collar wolves. In my opinion, relocation does not work. The wolves either return, or they do not survive the relocation. I feel that ranchers, landowners and agents of the land need to adhere to using non-lethal methods to haze wolves for the first and second offenses if the agencies are able to collar the wolves, and if the agent/landowner is authorized kill permits IF and ONLY IF the wolf is “IN THE ACT” of killing calf. If a third offense occurs, then I believe that the agencies should issue a 45-day lethal take permit that can be used by both the agent/landowner and the agencies to remove the problem wolves.

Also during this time, ranchers on Morgan Creek (downriver near Challis, ID) were dealing with even more issues – 30% cutback in grazing time allotted on sections of Morgan Creek because of endangered salmon, and Elk Calving and sage grouse breeding grounds, as well as a resident wolf
pack. I attended a few meetings that were organized & facilitated by Idaho Roundtables. Everyone who had anything to do with the Morgan Creek allotment was there (Ranchers, USFWS, NMFS, BLM, NRCS, IDFG, NOAA, Tribes (Shoshone-Bannack), USFS and Wildlife Services). The facilitator for Idaho Roundtables was Linda Hestag. Having a facilitator was key to the progress and success of this group. Also key were the agency folks willing to take the extra step to be creative, and search for solutions to help these ranchers fight for their families and the way of life that they had grown accustomed to living in rural Idaho. Chance Gowen and Russ Camper from the USFS, and Steve Cote (NRCS) developed a huge wall map of the Morgan Creek allotment and developed a biological plan on the allotment. Everyone put on their thinking caps in the room and started to identify the critical areas – the 30% stream utilization (where can the cows get water as they are moved to summer range), endangered salmon, timing of sage grouse activity on the lec, elk calving and wolves denning. It took the input of everyone in the room, and everyone agreeing on some common ground of what they wanted and how to get it. In the end, I believe that they were successful, had made friends in the process, and just about everyone involved went on the round up. This article by Peter Donovan best describes what happened on Morgan Creek: http://www.managingwholes.com/challis.htm.

When the State of Idaho took over wolf management, the agency no longer had money for radio-collaring wolves or monitoring. The radio-tracking equipment went away, and I felt like so did our ‘tools’ for being able to minimize conflicts between livestock and wolves. I left the ranch in 2006, which was about the time this change was taking place so I do not know how the ranch has managed since. Idaho’s solution was to create a hunting season on wolves, which may not be such a bad idea. A hunting season may actually reduce the number of dispersing Idaho wolves into Oregon. The wolf may begin to fear humans as a result, which will keep them deeper in the wilderness hopefully. That’s the general idea anyway, but this is the first time that human’s in the modern west have tried to co-exist with a large predator, which makes the future of the rancher somewhat shaky.

I see frustration, fear, anger and hopelessness on the faces of the ranchers here in Wallowa County. It shouldn’t have to be that way. I’d like to think there is an answer, but the rancher also has to be willing to give it a try, and be open to change because change is happening whether they like it or not.

Thank you,

Judy Hall Goodman

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Judy Hall Goodman
60515 Liberty Rd
Joseph, OR 97846
home: (541) 432-0384
halljudy57@gmail.com

7/13/2010
Please protect this potential natural resource in Oregon through three primary measures:

1. The wolf plan needs to require farmers to dispose of livestock carcasses. Don't attract them to domesticated animals!
2. Eliminate the authorization for killing wolves not caught in the act of attacking livestock.
3. Scientists recognize that hundreds, if not thousands, of breeding animals are necessary to ensure long-term genetic health. Four breeding pairs is setting the bar way too low to consider state delisting.

Allowing continued wolf "control" by federal hunters and trappers will forever prove a disincentive to truly seeking to prevent wolf/livestock conflict. It is also likely to prevent establishment of a viable wolf population in Oregon -- particularly as the state of Idaho proceeds to reduce its wolf numbers.

Thanks for listening.

Karah Stokes
Kentucky
Dear Oregon Department of Fish and Wildlife,

My name is Katie Hick and I live in Newberg, Oregon. I am currently studying Zoology at OSU with the hopes of becoming a wolf biologist. With the Wolf Management Plan in its 5-year review, I think it is time to strengthen the plan. Here are some changes I would love to see in regards to the plan.

- Raise the number of breeding pairs for delisting to at least 16 statewide or more. Four breeding pairs in eastern Oregon and four in western Oregon is not enough to maintain a health population. Disease of abuse of power could spell disaster for such a small number of animals.
- Give more options when relocating a “problem” wolf or wolf pack. Wildlife officials should be able to relocate wolves across state to national and state parks or to areas will less livestock or areas will less hostile views. Relocation should not occur in denning season to prevent wolf pup fatalities.
- Raise the number of cases of depredation to at least 10 before it is considered “chronic depredation.”
- Lethal control of “problem” wolves or wolf packs should only be considered if a livestock owner has done every method possible to protect his/her livestock. These methods could include, but are not limited to, proper fencing, fladery, radio collar activated sounds, guardian animals, lambing and calving sheds, frequent patrols of pastures, placing livestock in barns at night, and tracking packs to avoid placing cattle in areas where wolves are known to be.
- Delay Phase 3 of the plan until the number of individual wolves reaches about 500 statewide.
- Allow harassment with attempt to cause injury, but not death, when a wolf is attacking a pet. Pets should include animals such as dogs, cats, rabbits, horses, and other animals that are kept without the intent of slaughtering.
- Biologists and ecologists should have priority when it comes to decisions concerning the health of the Oregon wolf population, not livestock owners and stockholders.

I believe that these changes or changes similar to these will strengthen Oregon’s Wolf Management Plan and provide more options when dealing with “problem” wolves. I will support a plan that allows wolves reach a healthy and stable population.

Thank you for your time,

Katie Hick
Christina A Schmidt

From: Michelle Dennehy
Sent: Tuesday, June 01, 2010 12:56 PM
To: Michelle Tate; Craig Ely
Subject: wolf plan comments

Re: relocation

6/17/2010

From: Josh Laughlin [mailto:jlaughlin@cascwild.org]
Sent: Tuesday, June 01, 2010 12:10 PM
To: Michelle Dennehy
Subject: Re: relocation

Thanks for sending this, Michelle. My unsolicited feedback: If we are genuinely interested in exhausting non lethal measures prior to authorizing killing of wolves due to livestock depredations, I would suggest ODFW consider relocation "problem" wolves to a suitable wilderness area. Perhaps that can be worked into the five year review. Please forward this recommendation to Russ and others working on the five year review.

Josh

At 11:55 AM -0700 6/1/10, Michelle Dennehy wrote:

Some mention of relocation in the plan and Oregon Administrative Rules. We don't relocate wolves that are killing livestock.

http://www.dfw.state.or.us/OARs/110.pdf

(4) Relocation. ODFW will authorize relocation by state personnel when a wolf (or wolves) becomes inadvertently involved in a situation, or is present in an area, that could result in conflict with humans or harm to the wolf. The relocation will be designed to prevent conflict with humans or reduce the possibility of harm to the wolf. The wolf (or wolves) would be relocated to the nearest wilderness area at the direction of ODFW.

Wolves may be relocated to resolve an immediate localized problem from an area of human activity (e.g., wolf inadvertently caught in a trap) to the nearest wilderness area. Relocation will be done by ODFW or Wildlife Services personnel.

Relocation will occur when a wolf or wolves become inadvertently involved in a situation or are present in an area that could result in conflict with humans or harm to the wolf. Examples could include a wolf caught in a trap set for another animal or a wolf found living within or near communities and causing human safety concerns or killing pets.. For such action to
occur, three criteria must be met:

* The action must be conducted by state personnel only.
* Wolves will be relocated to the nearest wilderness area at the direction of ODFW.
* The action must be taken to prevent conflict with humans or reduce the possibility of harm to the wolf.

____________________________________
Michelle Dennehy
Wildlife Programs Communications Coordinator
Oregon Department of Fish and Wildlife
3406 Cherry Avenue NE
Salem, OR 97303
http://www.dfw.state.or.us/
tel. 503 947 6022
cell 503 931 2748
e-mail: Michelle.N.Dennehy@state.or.us

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Josh Laughlin
Campaign Director
Cascadia Wildlands - we like it wild.
www.CascWild.org - PO Box 10455 Eugene, OR 97440 - 541.434.1463

We educate, agitate, and inspire a movement to protect and restore Cascadia's wild ecosystems. We envision vast old-growth forests, rivers full of salmon, wolves howling in the backcountry, and vibrant communities sustained by the unique landscapes of the Cascadia Bioregion. Join us at:
https://org2.democracyinaction.org/o/5868/t/6327/shop/custom.jsp?donate_page_KEY=1053

6/17/2010
Please don't take wolves off the Oregon endangered species list until there are enough Oregon and nearby wolves to maintain genetically healthy populations. Many more breeding animals are necessary to ensure long-term genetic health. Four breeding pairs is tantamount to gutting the concept of state listing.

Please focus on NON-LETHAL management of Oregon's wolves. Not only do away with all authorizations for killing of wolves which are not caught in the act of attacking livestock, better yet, participate in with wildlife organizations that will reimburse ranchers for stock verified to have been killed by wolves.

Certainly do not give any authorization for killing a wolf unless all carcasses of non-wolf-killed livestock are routinely and quickly disposed of so that wolves are not attracted. Other wise you are simply playing into the hands of uncaring people who should not be "calling the shots" on the management of Oregon's wildlife.

Thank you for your consideration.

Kunda Wicce
6607 Willamette Dr.
Austin, TX 78723
US
Second try at sending my comments below.

Begin forwarded message:

From: Laurel Hines <laulehines@gmail.com>
Date: June 28, 2010 6:11:10 PM PDT
To: ODFW.Comment@state.or.us
Subject: re wolf management plan

To Whom It May Concern,

I was very dismayed to hear the hear the only Oregon wolf pack alpha male wolf may already be dead. I am extremely concerned that Oregon's wolf management plan is very inadequate to allow wolves to make a come back in Oregon. Not long ago I heard experts present information about how top predators help the whole ecosystem, down to the butterfly and beyond. We need a return of wolves, not only for the ecosystem, but for future generations. At the current time, I believe the wolves returning to Oregon need more protection from unnecessary killing by ranchers who are not doing as much as possible to avoid predation by wolves, and due to their hatred of wolves, use any excuse they can to legally or illegally shoot wolves.

ODFW should go back to the drawing board and make a more scientific recovery plan, using new factual information about how predators help the ecosystem and regulate prey numbers, and account for the necessity of wolves for a healthy ecosystem.

Ranchers should be required to certify their use of non-lethal solutions to protecting livestock, and prove they are taking all precautions to avoid predation by wolves before allowed to use any lethal methods or receiving compensation for wolf killed livestock.

ODFW should take the lead in livestock wolf conflict issues with ranchers, and not USDA. I have had contact with USDA and have found them to be all too eager to kill and poison predators without fulfilling their duties to inform people on avoiding predation or using non-lethal methods to avoid problems. Wolves are Oregon wildlife that deserve management and protection to exist for all Oregonians.

Relocation language needs to be changed and clarified in the wolf plan. Wolf packs should not be separated, and wolves need adequate places to survive.

Wolves, as Oregon wildlife, should be managed for us all, not just hunters and ranchers, but all those of us who want a healthy ecosystem and to have Oregon once again have at least some of its native species, even the large predators.
Laurel Hines
Dear ODFW,

We agree with the suggestions of the Predator Defense founder Brooks Fahy:

1. ODFW should go back to the drawing board to come up with a scientifically supportable recovery level that includes reestablishing wolves' ecological effectiveness at regulating prey, vegetation, and mid-sized predator populations. We urge you to allow wolves to fulfill their natural role in our ecosystems.

2. Requiring only four breeding pairs of wolves in order to remove protections and seven breeding pairs as a management objective is unconscionable and not based on science. ODFW should engage independent biologists to assist the agency in crafting a scientifically robust recovery and management plan.

3. Rather than killing wolves, ODFW should require livestock producers to certify their use of various proven non-lethal solutions, including carcass removal. Producers should take responsibility for their livestock on both public and private lands.

4. The best way to resolve and minimize livestock conflicts is through education and implementation of non-lethal methods, such as guard dogs, shepherding, fencing, fladry, and improved animal husbandry tactics such as removing/protecting animals in greatest jeopardy such as cows and ewes during parturition and young vulnerable animals, and disposing of carcasses, afterbirths or any other attractant to predators. I/We appreciate the plan's emphasis on non-lethal control but suggest it be more clearly defined and be required before receiving financial compensation or permits to allow lethal take.

5. ODFW should clarify language in the plan pertaining to the process ranchers must follow in response to livestock conflicts. ODFW should be the lead agency in charge of investigations, and conflict prevention and response - not USDA-Wildlife Services. Producers should be required to contact ODFW.

6. Relocation language is a problem. Wolves involved in depredations can be relocated to nearest wilderness areas; however, much of these areas are rock and ice, or barren. Language should be changed to allow for further relocations.

7. We support a state compensation trust fund seeded with startup funding for compensation at fair market value for livestock losses confirmed to wolf depredation. Use of, with the assistance of agents, appropriate non-lethal methods should be documented before awarding compensation. With an adequate compensation program, wolves should not be killed in response to conflicts.

8. We oppose having wolves be managed or controlled for the benefit of big game or ungulate populations. Wolves and elk (and other prey) co-existed for
thousands of years, with natural ebbs and flows to population numbers, distributions, and densities. Wolves make ungulate herds stronger by preying upon vulnerable or unhealthy animals.

Thank you for taking our comments.

Leslie Burpo and Frances Uyehara
P.O. Box 5468
Eugene, OR 97405
I have been alerted to the fact that the Imnaha wolf pack (only breeding pack) is being killed needlessly. As far as I am concerned these endangered animals have more of a right to live than we do and need to put a stop to the senseless killing and we have no right deciding who lives or dies.

Lori

Solem
Christopher P Schubothe

From: Lydia Garvey [wolfhowlmama@yahoo.com]
Sent: Monday, June 21, 2010 10:26 PM
To: ODFW.Comments@state.or.us
Subject: Oregon Wolf Plan

I strongly urge you to Ensure a sustainable population of wolves by: Clear non-lethal steps to avoid killing. Make these apply equally to all & Change rancher behavior (to co-exist with wolves & not attract them) by education. Wolves are vital to ecosystem balance.

Stop the war on our wildlife!
Your attention to this most urgent matter would be much appreciated by all present & future generation of all species.

Thank you
Lydia Garvey Public Health Nurse
429 S2 4th Clinton OK 73601
Hi,

Please increase the number of breeding pairs required before downlisting to threatened to 11 breeding pairs. Any less is not in accordance with the Endangered Species Act for recovery from the brink of extinction.

Also, wolves who kill cattle are in the wrong place. They need to be moved to where there are no cattle. Coyotes and people's dogs kill most calves, but you don't issue kill permits for them, do you?

As long as ranchers are being reimbursed for losses, there is room for options like relocating them beyond walking distance of the ranch that is bating wolves by leaving calves sprinkled all over the hills. Careless ranchers must be fined unless they try to cooperate.

Please increase funding for wolf recovery efforts, too. Ranchers must be taught how to protect their livestock. Just killing every predator that comes along doesn't work. They come along when ranchers are careless and negligent.

Please do not kill any wolves on federal or state land. Cattle who graze in wildernesses do so at their own risk, dumped there by their owner who may not even live in Eastern Oregon.

Thank you,
Marcia Denison
Please bolster protection for wolves in Oregon through three primary measures:

Dear Sirs,

I am very disappointed to hear how Oregon is handling the wolves that are now living within its borders. The so-called Management Plan appears to be no more than a justification for killing them.

Wolves are highly dependent on their pack, which is actually a family of wolves. To kill some of the pack is to destroy the family unit and risk the survival of the remaining members. To maintain only 4 breeding pairs is to doom the population because it is way too low a number to be viable, as scientific recommendations confirm. And to kill wolves for eating carcasses is akin to condemning them to death for trying to live. It is a terrible idea to leave dead livestock around because it will attract wolves. Anybody leaving carcasses out is effectively setting up the wolves for assassination, and those people are the ones who should be punished, not the wolves.

Wolves in your state are something to be very excited and proud of, and they need to be protected from citizens who are not thinking clearly about anything except their own profits and losses. Certainly people need to be educated about the ways and the roles of the wolves, and in addition, please also consider enacting the following:

1. Require the removal or destruction (i.e., rendering inedible) of the carcasses of non-wolf-killed livestock so that wolves are not attracted to areas with vulnerable stock.

2. Eliminate the authorization for killing wolves not caught in the act of attacking livestock.

3. Raise the bar for consideration of taking wolves off the Oregon endangered species list, from the unsupportable number of four breeding pairs to a number reflecting the needed distribution within and outside the state to ensure Oregon's wolves' connectivity to wolves elsewhere and the wolves' genetic health.

The 2005 wolf plan is remiss in not requiring disposal of livestock carcasses. Far better to prevent conflict than to scapegoat wolves once they become habituated to domestic animals.

Allowing continued wolf "control" by federal hunters and trappers will forever prove a disincentive to truly seeking to prevent wolf/livestock conflict. It is also likely to prevent establishment of a viable wolf population in Oregon -- particularly as the state of Idaho proceeds to reduce its wolf numbers.

Scientists recognize that hundreds, if not thousands, of breeding animals are necessary to ensure long-term genetic health. Four breeding pairs is setting the bar way too low to consider state delisting.

Thank you for your consideration.

Marsha Penner
4532 Jutland Place
San Diego, CA 92117
US
Christopher P Schubothe

From: M J Hildreth [mjhildreth@pacinfo.com]
Sent: Saturday, June 26, 2010 5:31 PM
To: ODFW.Comments@state.or.us
Subject: Killing Wolves in Eastern Oregon

Dear ODFW:

As a tree farmer (timber) who also has raised goats for the past 20 years, I am very familiar with predators. Each episode of predation has inspired me to improve my shelter and fencing arrangements. I also employ the services of my wonderful Newfoundland mix guard dog, Buddy, and my guard llama, "llama bean". Together, we have saved the lives of livestock and predators alike. I have NEVER opted to kill a predator.

As human beings who rule over every other creature on the planet, we have a moral obligation to resolve conflicts with wildlife by humane methods. We continue to take an ever-increasing amount of the natural habitat of predators for personal and financial gain. This fact further obligates us to treat predators in a responsible and humane manner. Too often, the ODF and W relies on killing as an easy solution.

Livestock producers should consider nonlethal methods of predator control, such as secure (top and bottom) electric fencing, as a reasonable business expense. The killing must stop.

Sincerely, Mary Jane Hildreth, P.O. Box 841, Sweet Home, OR 97386. Best phone number to reach me: 541-484-0919, or leave message 541-517-8715
Dear ODFW: Please SAVE the WOLVES of Eastern Oregon. They have a right to be there. You are violating the Oregon Wolf Plan. Ranchers must show some responsibility and use NON-lethal methods to control predation. STOP KILLING WOLVES! Sincerely, Mary Louise Hildreth, 2565 Lincoln, Eugene, OR 97405
Wolf "control" by federal hunters and trappers will forever prove a disincentive to truly seeking to prevent wolf/livestock conflict.

It is also likely to prevent establishment of a viable wolf population in Oregon -- particularly as the state of Idaho proceeds to reduce its wolf numbers.

Thank you for your consideration.

Michele Shimizu
32 Grove Street
Boston, MA 02114
US
Christopher P Schubothe

From: Michael Miller [miller.m.d.flg@worldnet.att.net]
Sent: Wednesday, June 23, 2010 9:06 PM
To: ODFW.Comments@state.or.us
Subject: Wolf management comment

We are part time residents of Oregon, working on moving there full time. It is a great thing to have Gray Wolves living in Oregon. As the son of a cattle rancher, I am aware of depredation issues. However, I believe that public land ranching carries a great level of personal responsibility for the ranchers. The loss of some cattle units annually to predation, whether wolves, lions, bears or even coyotes, is an acceptable and appropriate normal "cost of doing business" on public lands. DO NOT cave into pressure from the ranchers or even the hunters to kill more wolves! Naturally occurring predators belong on this land much more than cattle or sheep!

Mike Miller
miller.m.d.flg@att.net
Hello,

My name is Mishelle Williams, I am 26 years old and I have lived in Joseph, Oregon my whole life not counting the 4 I attended University of Idaho in Moscow.

As tax paying citizens, my husband and I have some real concerns about the wolves that are taking over Wallowa County and the surrounding area. We are not ranchers, I am a teacher and he is an electrician. We are concerned because we do enjoy activities in the forest, where these wolves started out. Now they have moved into the valley. As a person who likes to walk, and be outside it is a little scary that these wolves have been killing animals/livestock just a few miles from my house. We all know how wolves can travel miles in a day, it would only take them maybe an hour to be near my property. Like I said we are not ranchers or farmers, but we are surrounded on all sides by people who are. I am not a gun toting person, however, I do believe in the right to bear arms. I just don't know how I would ever protect myself and my young son if I had to.

Wallowa Valley has been functioning fine without the wolves for the last umptine years, the food chain is not relying on them, so what is the push to keep them? People should not have to live in fear of these animals and alter their everyday lives to remain safe and feel secure on their own property.

The last thing the I am concerned about is the amount of tax payer money (that I have paid into) being spent on this issue. It is flat out ridiculous to continue removing these wolves using non lethal measures when they find their way back to the same places. I understand that kill orders have been issued, good luck with that. As far as I am concerned that is a joke too.

Please do something about this issue, the last thing our family should have to worry about is being attacked by a wolf when we are out trying to have a picnic, picking mushrooms and huckleberries, hiking, or PLAYING IN OUR YARD!

Thank you,
Mishelle and Jared Williams
Joseph, Oregon
To Whom it May Concern:

After careful research and study of wolves and their presence in Oregon for my graduate program, I am writing in support of continuation of the Wolf Management Plan. My research included speaking with an ODFW representative as well as Jim Beers, who is promoted by the Oregon Cattleman's Association as a wolf expert. As well, I followed reportage on the events in Wallowa County this spring. In the course of my research, it became quite clear to me that wolves are an important part of the ecosystem and should be allowed to remain in Oregon. That said, I feel the concerns of ranchers are valid, though the number of livestock lost to date is minimal. Taking the Imnaha pack as a case in point, it is evident that they have responded to measures taken to stave them off, and have moved on. Overall, I find the current management plan to be sufficient and effectual. I do not agree with the amendments proposed by Oregon Cattleman's, especially the provision that would allow ranchers with caught in the act permits to shoot an wolf on the rancher's property.

Thank you for consideration of my comments.

Sincerely,
Neva Knott
Portland, Oregon
While planning for wolf management in Oregon, you might wish to include considering the question, “What good are wolves?”

As early as 1944, Adolph Murie realized that wolves selected weaker Dall sheep, “which may be of great importance to the sheep as a species.” In 1951, his brother, Olaus Murie, thought predators may have an important influence during severe winters in reducing elk herds too large for their winter range. In 1967, Douglas Pimlott pointed out that wolves control their own densities. Those observations remain cogent today.

Restoration of wolves to Yellowstone National Park has added exponentially to our knowledge of how natural ecosystems work. It has also reminded us that predation is one of the dominant forces in all of nature, present in ecosystems worldwide over millions of years.

Predation of wolves is important to the integrity of the Yellowstone ecosystem, but we should realize that, before their return to Yellowstone’s northern range, 17 mountain lions there killed 611 elk per year, sixty grizzly bears killed 750 elk calves annually, and 400 coyotes killed between 1100 and 1400 elk per year (Crabtree and Sheldon).

Climate and human harvest account for most of the recent decline of the northern Yellowstone elk herd, coupled with the effects of five predators: grizzly bears, black bears, cougars, and coyotes. These are parts of a system unique in North America by its completeness (White and Garrott).

Berger et al (2001) demonstrated “a cascade of ecological events that were triggered by the local extinction of grizzly bears...and wolves from the southern (GYE).” In about 75 years, moose in GRTE erupted to 5 times the population outside, changed willow structure and density, and eliminated neotropical birds; Gray Catbirds and MacGillivray’s Warblers.

Incidentally, wolves haven’t eliminated moose from Yellowstone. But burning of tens of thousands of acres of moose habitat in 1988 (mature forests with their subalpine fir), hit the moose population hard, and it won’t recover until the forests mature again (Tyers).

Wolves change species abundance, community composition, and physical structure of the vegetation, preventing overuse of woody plants like willow, reducing severity of browsing on willows that provide nesting for songbirds. In Banff, songbird diversity and abundance were double in areas of high wolf densities, compared to that of areas with fewer wolves (Hebblewhite and Smith). Fewer browsers lead to more willows, providing habitat for beaver, a keystone species, which in turn create aquatic habitat for other plants and animals.

By reducing coyotes, which were consuming 85% of the production of mice in Lamar Valley, restored wolves diverted more food to raptors, foxes, and weasels. By concentrating on killing vulnerable calf elk and very old female elk, wolves reduce competition for forage by post-breeding females, and enhance the nutrition of breeding-age females. Wolves promote biological diversity, affecting 20 vertebrate species, and feeding many scavengers (ravens, magpies, pine martens, wolverines, bald eagles, gray jays, golden eagles, three weasel species, mink, lynx, cougar, grizzly bear, chickadees, Clark’s nutcracker, masked shrew and great grey owl). In Yellowstone, grizzly bears prevailed at 85% of encounters over carcasses, and they usurp nearly every kill made by wolves in Pelican Valley from March to October. Some 445 species of beetle scavengers benefit from the largess of wolf-killed prey. In Banff and Yellowstone, no other predator feeds as many other species as do wolves. Wolf-killed elk carcasses enhance local levels of soil nutrients; 20-500% greater nitrogen, phosphorous and potassium (Hebblewhite & Smith).
An average of four ravens were counted on carcasses in Lamar Valley pre-wolf. Post-wolf, that increased to 28 average, with as many as 135 seen on one carcass. Eagles seen on carcasses increased from an average of 1 per four carcasses to 4 per carcass (Stahler et al, 2002).

By lowering elk numbers, wolves may contribute to higher bison numbers; by decreasing coyotes, higher pronghorn numbers. Wolves may ameliorate ungulate-caused landscape simplification (White & Garrott).

Wolves may cause elk to shift habitat, using less aspen, and favoring songbirds that nest in the aspen (Fortin et al).

Hunting by humans does not benefit scavengers the way wolf kills do. Carrion from wolf kills is more dispersed spatially and temporally than that from hunter kills, resulting in three times the species diversity on wolf kills versus hunter kills. Wolves subsidize many scavengers by only partly consuming their prey; they increase the time over which carrion is available, and change the variability in scavenge from a late winter pulse (winterkill) to all winter. They decrease the variability in year-to-year and month to-month carrion availability (Wilmers et al).

Wolves buffer the effects of climate change (Wilmers & Getz 2005). In mild winters, fewer ungulates die of winterkill, causing loss of carrion for scavengers. Wolves mitigate late-winter reduction in carrion by killing ungulates all year.

Mid-sized predators can be destructive in the absence of large keystone predators. In the absence of wolves, pronghorn have been threatened with elimination by coyotes. Wolves have reduced coyotes, and promoted survival of pronghorn fawns. Pronghorn does actually choose the vicinity of wolf dens to give birth, because coyotes avoid those areas (Byers & Smith).

Chronic wasting disease could wipe out our elk and deer. It is plausible that wolves, which continually test elk and deer, looking for vulnerable animals, could remove sick animals and reduce the spread of the disease. Hunters can’t do that.

Wolves also scavenge carrion, such as aborted bison or elk calves. By eating them, they may reduce the spread of Brucellosis to other bison or elk. Wolves also cause elk to congregate in smaller groups, potentially slowing the spread of diseases that thrive among dense populations of ungulates.

Restoration of wolves has cost about $30 million, but has produced a $35.5 million annual net benefit to greater Yellowstone area counties, based on increased visitation by wolf watchers (Duffield et al.). Some 325,000 park visitors saw wolves in 2005, and in Lamar Valley alone, 174,252 visitors observed wolves from 2000 to 2009, and wolves were seen daily in summers for nine of those ten years.

Wolves cause us to examine our values and attitudes. Paul Errington wrote, “Of all the native biological constituents of a northern wilderness scene, I should say that the wolves present the greatest test of human wisdom and good intentions.”

Aldo Leopold, father of game management in America, said, "Harmony with land is like harmony with a friend; you cannot cherish his right hand and chop off his left. That is to say, you cannot love game and hate predators; ... The land is one organism." (From an unpublished 1938 essay, "Conservation," on p. 145-6 of Round River.)

Leopold also pointed out that the first rule of intelligent tinkering with natural ecosystems was to keep all the pieces. Eliminating predators is counter to that advice.

Wolves remind us to consider what is ethically and esthetically right in dealing with natural systems. As Leopold wrote in his essay, “The Land Ethic,” “A land ethic ...does affirm (animals’) right to continued existence...in a natural state.” He concluded, “A thing is right when it tends to preserve the integrity, stability, and beauty of the biotic community. It is wrong when it tends otherwise.”

(I was the resources interpreter at Yellowstone National Park who was principally responsible for educating the public about wolves and their recovery from 1985 to 1997,)
when I retired. I led field courses on wolf ecology and restoration from 1997 to 2005 for the Yellowstone Association Institute. I am a member of the board of the Wolf Recovery Foundation, and a volunteer for the International Wolf Center.)

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Norman Bishop
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June 24, 2010

To: Oregon Department of Fish and Wildlife
Re: Oregon Wild Comments on Oregon Wolf Conservation & Management Plan 5-year Review

Dear Commission Members,

Please accept the following comments from Oregon Wild concerning the 5-year review of the Oregon Wolf Conservation & Management Plan. Oregon Wild represents over 7,000 members and supporters who share our mission to protect and restore Oregon’s wildlands, wildlife, and water as an enduring legacy. Oregon Wild was founded in 1974 by a coalition of hunters and conservationists. Our goal is to ensure sustainable populations of all native wildlife. We emphasize the need for the protection of species whose populations are threatened or unnaturally low by protecting habitat and advocating for science-based management designed to recover populations to meaningful and sustainable numbers.

Wolves, like elk, salmon, eagles, and meadowlarks are native to Oregon. However, unlike most native species, wolves stir up strong emotions in both their admirers and detractors. It was fear of wolves and a frontier mentality that led to a government-sponsored program of extermination for wolves and other predators. That program finally succeeded in eliminating wolves from the state of Oregon – and most of the rest of the lower 48 United States - by 1946.

Over time, attitudes changed. Society no longer found it acceptable to purposely or passively eliminate native species. In 1973 wolves were listed as a federally endangered species. The goal of any endangered species listing is to recover populations and the habitat on which they depend over a significant portion of their range so that the species can continue living in perpetuity without the need for continued active human intervention. The best available science should guide management decisions toward that goal.

In 1998 after a half-century long absence, wolves returned to Oregon from Idaho where several populations of wolves (wolves that naturally dispersed from Northwest Montana, the reintroduced population from Yellowstone, and other unknown populations that may never have been extirpated) had interbred. That wolf was quickly, and perhaps illegally, returned to Idaho. Unfortunately, violent anti-wolf sentiment, misinformation, and fear of predators remain among some segments of the human population and the next wolves to return to Oregon fell to the bullets of poachers and were hit by cars.

In 2005, in response to public concern and after an exhaustive public process that involved representation from significant stakeholder groups, Oregon wisely finalized a wolf plan. The plan was a social and political compromise among the groups. It came of great compromise from all sides – especially from the conservation community. Despite, or perhaps because, of those compromises some have opposed implementation and finalization of the plan since its inception. Many of the same interests responsible for the extermination of wolves in the first place seem intent upon a repeat of history and have also fought to undermine and weaken the plan - and their credibility - with legislation and changes to relevant Oregon Administrative Rules.

Despite our concerns that the plan was incomplete, poorly funded, not entirely scientifically defensible, and had serious shortcomings, Oregon Wild and many other conservation groups honored the compromise. Despite our reservations, we have vehemently defended the plan, the process, ODFW, and ODFW personnel.
In 2008, Oregon confirmed its first wolf pups in over 60 years. Within days, Washington confirmed the same. The wolves that have begun to establish themselves in Washington have now been shown to be dispersers from coastal wolves in British Columbia. This has set the stage for the Pacific Northwest to be a particularly important region where intermixing and connectivity between different populations of wolves can occur. Though the wolf populations in Washington, British Columbia, Montana, and the wolves reintroduced into Yellowstone are all the same species and live in a contiguous range that once included Oregon, the connectivity between different populations is important to the meaningful long-term viability of the wolf population on the regional scale.

Most Oregonians welcomed the news of wolves breeding in Oregon. However, others continued to fight against the wolf plan and wolf recovery despite the fact that wolves had been in Oregon for over 10 years without any livestock depredations. Oregonians and the livestock industry had years to prepare for the return of wolf populations and the conflict that might follow. By not doing so, a critical opportunity was lost. Though some made appropriate changes, many resisted. Animal husbandry practices that had never been adapted to coexisting with native predators remained. In the spring of 2009, after being present for over a decade, the first confirmed predation of livestock by wolves occurred by a pair of young wolves in Northeastern Oregon. These young-inexperienced wolves were likely drawn to penned sheep by the presence of a 2-acre carcass pit, and unguarded prey. ODFW worked with the effected rancher to eliminate the attractants and first responded by attempting non-lethal methods to deter the wolves. Those efforts succeeded during the summer.

That same summer, western wolves (including the entire known population in Oregon) were stripped of their protections as a federally listed endangered species. The legality of that decision is being challenged in federal court. While interested parties await a decision in that case, management of wolves falls to individual states. As Montana and Idaho planned wolf hunts designed to test the feasibility of managing wolves by sport hunt with the stated goal of ultimately dramatically reducing numbers, Washington began developing what appears to be a much more protective wolf plan, and Oregon was being given its first test.

That test led to an unfortunate, but relatively non-controversial result. Non-lethal control measures worked on the pair of wolves during the summer. However, they returned to kill livestock in the fall. A kill order was issued, and Wildlife Services (formerly Animal Damage Control) killed both wolves.

Despite being saddened by the serious blow to wolf recovery, Oregon Wild and other conservationists continued to stand by the plan designed specifically to reduce conflict and inform a rational decision-making process when conflict occurred. Meanwhile, the Oregon Farm Bureau, Oregon Cattlemen’s Association, and others hostile to wolf recovery attempted to pass legislation giving private citizens the right to take management decisions for endangered wolves into their own hands. They proposed language allowing private citizens to “take” a wolf at any time without a permit if the wolf is chasing or harassing domestic animals, and make the unverifiable determinations themselves. This legislation would have made poaching laws virtually impossible to enforce.

Earlier this year, at the outset of the mandated 5-year review of the Oregon Wolf Conservation & Management Plan Oregon Wild again testified in defense of the plan, full funding, and enabling ODFW wildlife managers and biologists to do their jobs. We expressed our relief that the plan was to be reviewed and not rewritten. However, we expressed our concern that Oregon’s wolf population was small and their recovery precarious. Furthermore, we did not shy away from the fact that the plan was relatively untested, contained very real flaws, and that the potential existed for unnecessary and unhelpful histrionics.

A representative from The Oregon Cattlemen’s Association also testified and expressed their continued disdain for the wolves, the Oregon Wolf plan, ODFW, sound science, and the review process itself.
At that time ODFW had a confirmed wolf population of 14 wolves in two packs, and ODFW’s plan was relatively untested.

Since that time, we have seen the wolf plan implemented during a time of conflict – much of it whipped up by the usual suspects. We believe that the wolf plan and relevant OAR’s have been violated - certainly in spirit if not by the letter. ODFW has bent to the pressure brought by rabid anti-wolf interests who have demonstrated little credibility and no interest in meaningful collaboration or the conflict-free recovery of a species they themselves once pushed to the brink of extinction.

Our comments now must necessarily reflect our disappointment with the events of the last few months and address both the implementation of the plan as well as the language of the plan itself.

1) **Funding**
As with all non-game wildlife programs, the wolf program is woefully underfunded. This problem has been aggravated by a persistent national recession and particularly bad economic climate in Oregon. Funding for non-game wildlife generally and wolf programs specifically are not commensurate with the value of non-game species or their associated economic impact. Lack of funding for the program is an underlying cause of many of the plans weaknesses - both theoretical and as seen in implementation. If Oregon’s wolf population grows in number and expands in range while human passions continue to mount, these problems will only continue to worsen. ODFW must increase funding to the wolf plan by:

- Aggressively pursuing potential funding mechanisms including federal grants and appropriations, state appropriations, and initiative petitions,
- Prioritizing funding for wolves and species whose existence in the state is threatened over those that are abundant and non-controversial.
- Actively seeking creative sources of funding including but not limited to a wolf license plate, user fees from stakeholders with an emphasis on those who profit from and utilize public land and benefit from wildlife management such as the livestock industry, the renewal of a tax check-off, and other sources.

2) **Appropriations**
Budgeting should recognize and account for the likely increase in need that will come if wolf populations grow and conflict continues to increase. There is no line item cost identified for non-lethal control assistance to parties most likely to have conflict with wolves.

3) **Relocation**
Relocation language within the wolf plan is far too restrictive. The focus of conflict management should be non-lethal control. As a complicated endangered species with many human antagonists, relocation may provide a simpler, more appropriate, and more economical tool than many other management options.

With an understanding that relocation of wolves is not a cure-all and may be problematic under some circumstances, wildlife managers should have an exhaustive list of non-lethal options to turn to before lethal control that includes relocation. The liberalization of relocation language should not be written so as to obligate wildlife managers to utilize this particular option. However, the current language restricting relocation of wolves to the nearest Wilderness in some cases literally means moving them up a hill and is of little practical help. Especially while wolf populations are low, many of the problems identified with relocation are not problems at all. Though often disconnected by wide swaths of private land, grazing allotments, and other potential conflict areas, Oregon still has a significant pool of unoccupied high-quality wolf habitat.
4) Compensation Program
The loss of pets and livestock to wildlife is a risk taken by rural and urban folks alike. The number of domestic animals lost to predators is dwarfed by those lost to weather, disease, human thieves and any number of other causes. Some scientists have postulated that an increase in wolves may actually reduce the presence of mesopredators like coyotes which take a much greater toll on domestic animals than wolves. All of that of course is of little consolation to the individual affected by a wolf depredation or the viewer of a grizzly picture of a wolf killed lamb.

As a gesture of good faith and an acknowledgement that depredations on livestock would occur, conservationists supported an appropriate compensation program to reimburse livestock and pet owners who lose animals to wolves. Surprisingly, this effort was actively and effectively opposed by the Oregon Cattlemen’s Association and others.

We continue to believe that while science-based management with an end-goal of sustainable wolf recovery should guide management decisions, an appropriate compensation program could go a long way in further assuaging the socio-economic concerns of those most likely to be negatively effected by wolves.

It’s worth noting that a flawed compensation program could be more problematic than no program at all. Some compensation programs have in fact provided incentive for poor husbandry. By actively or passively enticing wolf depredations, some individuals reap unfair financial rewards and see it as an opportunity for “bad p.r.” for wolves.

We urge ODFW to include and advocate for a compensation program that would:
- only compensate domestic animal owners who have taken well-defined and comprehensive steps towards preventing depredations
- only compensate for depredations that occur on private lands and are clearly caused by wolves as determined by a wildlife professional trained in making such determinations and following a rigorous, standardized, well-documented, and public process
- be funded by a separate source and not raid or come at the expense of funds designated for non-lethal measures or already underfunded non-game wildlife or wolf programs
- distribute funds on an annual basis and divided amongst claimants instead of on a “first come first serve basis”
- in the case of livestock being raised for human consumption, pay fair market value for animals at the time of their depredation not based upon a theoretical fair market value for an adult animal in full health.

5) Animal husbandry program
There exists a steep learning curve for individuals in the livestock industry in coexisting with wolves. Prior to 1946, dealing with conflict was uncomplicated and meant simply killing wolves. This of course led to several generations in which there were no wolves to deal with. Unfortunately, some in the livestock industry are actively resistant to learning and applying non-lethal methods of dealing with preventing conflict. Even so, ODFW should create, fully fund, and support a program to educate the owners of domestic animals in wolf country on methods to proactively prevent and manage conflict. Additionally, we would support a program designed to assist landowners in implementing those techniques. This and other non-lethal methods of conflict prevention and control should be considered paramount or at least co-equal to confirming wolf kills and lethal control of wolves, and must also take place on public lands. So far this has not occurred, and the problem has been exacerbated during times of conflict.

In Chapter 3, Section C, the wolf plan requires livestock owners to make “a good faith effort to achieve a non-lethal solution”, but not exhaust all non-lethal techniques. This should be changed, or at a minimum a “good faith effort” should be clearly and appropriately defined and require similar efforts of adjacent livestock owners.
6) Conflict on public vs. private land

Though the wolf plan makes references to different philosophies for conserving and managing wolves on public vs. private lands, it is an important distinction that should be clarified in how those differences will play out in implementation. Wildlife conservation and management is not undertaken simply to appease a single economic interest, but for the benefit of all Oregonians. Similarly, public lands are meant to be managed for all citizens, not just those who profit from or live in the closest proximity to them.

With the unlikely exception of a wolf acting aggressively towards humans, the very notion of a “problem wolf” on public lands is a false one. Even after depredation events on public lands, conservation and non-lethal hazing should take an even greater importance than on private land, and conditions on adjacent private land should be taken into account. The differences currently outlined in the plan are insufficient, often unclear, and poorly explained in relevant sections of the plan.

7) Depredation confirmations

Interested stakeholders in wolf management would surely prefer that the individuals or agencies designated to investigate wolf depredations be the ones most likely to make conclusions that lead to their preferred management objectives. Unreasonable anti-wolf interests would like a positive determination 100% of the time, and unreasonable pro-wolf activists would prefer the opposite. We believe positive determinations should be defensible as such and based upon clear, measurable, documented evidence.

The events of 2010 have demonstrated a clear need for the standardization and clarification of training for investigators, the process of investigation, and publication of results.

Involvement in investigations should be limited to the livestock owner or effected member of the public (not advocacy or trade groups to which they belong), and trained investigators who have undergone rigorous and standardized training. Law enforcement’s role should be limited to enforcing the law, protecting evidence, and ensuring a safe area for investigators to do their job. As with training, the process for making determinations should be standardized, rigorous and clear. Similarly, the procedure for making the results of investigations publicly available (regardless of determination) should be standardized. The evidence and conclusions should be well documented and readily available to concerned members of the public. But again, to emphasize, the public should not be involved in making the determination itself.

The events of 2010 also demonstrated that when wolf hysteria hits, ODFW can expect to be inundated with requests for investigation of livestock losses. Confirmation of depredations should not come at the expense of other requirements of the plan such as education, non-lethal control, and pursuit of funding.

A final lesson of 2010 is that - at this time - ODFW remains the most credible agency for determining wolf depredations. Wildlife Services (formerly Animal Damage Control) has discredited itself by dispatching its wolf hunter to make determination. Mr. Riggs has demonstrated himself to be unfit for this responsibility. In addition to making flagrantly flawed determinations, the agency has also helped fan the flames of conflict by enlisting untrained anti-wolf activists to help make and publicize their determinations. These activists have effectively used their involvement to claim credibility, politicize the process, and effectively make public attacks aimed at undermining the perception and credibility of ODFW.

8) Recovery Numbers

Recovery numbers (the number of wolves after which the species can be considered for delisting) represent one of the greatest compromises from conservationists of the wolf plan and one of its greatest flaws. Furthermore the plan’s relisting triggers are shockingly problematic. Recovery numbers may be politically or socially defensible within certain segments of society. However, they are not scientifically defensible.
Washington State is currently working to finalize their wolf plan. They set significantly higher recovery numbers, but that plan was unanimously blasted by a blind panel of scientists as being far too low. If that plan is laughable, Oregon’s is a crying shame. We are nearing recovery numbers for wolves in Oregon. With a population of 14 confirmed wolves (at the time of this writing, at least one is missing and feared dead, and Wildlife Services has a kill authorization for two more), to claim Oregon is close to having achieved recovery is a contradiction to the word conservation in the full title of the Oregon Wolf Conservation and Management Plan.

Triggers for relisting are a major cause of concern. Under the current plan if wolves fall below recovery numbers due to poaching or legal lethal control, wolves may not be relisted. Since the single greatest threat to wolves is human-caused mortality, this must be addressed. If wolves fall below the population number that allowed their delisting in the first place or experience a precipitous decline, they should be immediately relisted as a state endangered species until they again achieve recovery numbers.

Wolves are a wide-ranging social species with intricate behaviors and systems that we are only beginning to understand. Meaningful and sustainable recovery can not be achieved with a small, dispersed population constantly under threat. By prematurely resorting to killing wolves, killing the wrong wolves, disrupting pack structures, or creating habitat sinks, wildlife managers put wolf recovery in numerical jeopardy and may in fact create more problems and conflict than they solve.

Minimum wolf numbers should be guided by the best available and most current science. If the numbers are different due to political or social reasons, the wolf plan should explain the reasoning. Ecosystems are able to achieve a dynamic equilibrium and while establishing a minimum number is prudent to ensuring recovery, the wolf plan was wise not to create cap numbers for wolves and that must not change in the foreseeable future.

9) Interagency roles, process, and communication
The roles, relationships, and communication between agencies and stakeholders have not been clearly defined. ODFW should address this problem in an appropriate manner that preserves the goals of the wolf plan and ensure appropriate science-based management.

10) Species Prioritization
All native wildlife should, at a minimum, be conserved to ensure sustainable populations not in need of perpetual human intervention. However, conservation efforts should be directed first and foremost towards those species – like wolves – that are endangered, under threat, at artificially low numbers, or controversial. Several parts of the plan – notably Chapter 4, Section C prioritizes species whose populations are not under threat or are even being held at artificially high numbers. Wolves and other predators can and will cause changes in behavior and population of other species. These impacts are just now beginning to be understood and current science indicates wolves and other predators play a beneficial role in maintaining healthy ecosystems. This is part of a natural process. Changes in populations of other species should not require lethal control of wolves unless 1) a decline occurs in a species that genuinely threatens its existence across a large range and 2) it can be proven that wolves are in fact a primary cause of said decline.

12) Review Process
While we are generally pleased with the process for the review of the wolf plan and grateful for public involvement, we believe the original stakeholder committee should be re-engaged in the process. Their insights into the process that created the plan, its implementation, proposed revisions, and other events are particularly valuable and should be taken into account. Doing so would not require a rewrite of the plan.
Though the majority of comments coming from the public may not have a mastery of the minutiae of wolf management or provide clear suggestions for improvements to the plan, they demonstrate the clear and overwhelming desire for meaningful wolf recovery from the general public. Wolf management, like that of any other wildlife species effects and is not just for a subset of special interests most proximate to the population. Public comments should be considered in final decision and revisions.

14) General Suggestions

- Recognizing the plan is relatively weak, ODFW must stand up for science-based management of wolves (and other endangered species) that leads to a meaningful recovery. ODFW must actively defend against efforts to weaken the plan, legislation aimed at undercutting it, and schemes designed to reduce the agency’s role in achieving that goal.
- ODFW must unequivocally reaffirm its position that the ultimate goal of the wolf plan is conservation of the species and a sustainable recovery of the species. As long as wolves are listed, actions taken to reduce conflict must be unambiguously in-line with that goal and prioritize non-lethal management when conflict occurs.
- Resources are limited and inadequate. Funds must be found to address this problem. Even, and especially, when conflict occurs, non-lethal control, conflict prevention, education, and public outreach and other parts of the plan should be considered paramount or at least co-equal with lethal control and confirmation of wolf kills. These latter activities must not come at the expense of the former. This should be spelled-out in the wolf plan.
- Considering the very recent violent past of anti-wolf interests, the current passion of those forces, and the vulnerability of the current wolf population, ODFW should be very careful about what and with whom information is shared about the information given regarding the location of wolves. For specific suggestions of changes we would like to see enumerated, please see the letter that was submitted to ODFW by Oregon Wild & Hells Canyon Preservation Council on May 24th, 2010.
- Sound science must be vigorously defended against persistent and purposely promulgated wolf myths designed to stir up controversy. ODFW must enthusiastically rebut false claims including but not limited to those that claim wolves are a non-native species, spread new diseases, decimate game herds across the landscape, and exaggerate the threat to humans and the livestock industry. ODFW has credibility on the issue. Allowing such myths to go unchallenged or not put into context only continues to fuel the fire of passionate stakeholders and jeopardize wolf recovery.
- In recognizing legitimate science, the ability of individuals, organizations, and stakeholder groups to participate in the process determining wolf management should be in direct proportion to their credibility on the subject. Those that continue to be uncooperative, knowingly reference bogus science, or demonize wildlife should not be part of the discussion or meaningful collaboration.
- Though the wolf plan rhetorically recognizes the public value of wolves on the landscape, including their existence value, ODFW must clearly define that wolf conservation and management specifically, and wildlife management generally is for the public good, not for any particular stakeholder group. Conservationists, hunters, photographers, ranchers, wildlife lovers, disabled citizens, and extreme hikers are all equal stakeholders regardless of their zip code.
- Sections including Chapter 5, Section D – addressing the role of wolves and trophic cascades should be updated to incorporate the most recent best available science.
- Wolves have a complex social structure. Lethal take – whether through a sport hunt, agency action, or illegal action – has the potential to disrupt that structure and create the conditions for increased depredations and conflict. Through all phases of the plan, and even after de-listing, lethal take should be an option of last resort and precisely focus on individual wolves causing conflict.
- To remake the point, legitimate science aimed at achieving a goal of ecosystem health, integrity, sustainability and long-term meaningful recovery of endangered species should guide the review process and the implementation of the plan. Where the plan differs from that in theory or implementation due to political, social, or legal compromise, ODFW should acknowledge such.
15) Parts of the plan that should not be changed include:

- ODFW must continue to be the final decider of depredations
- Any cost-benefit analysis must consider ecosystem services, existence values, and other benefits (realized and potential) of wolves, and not just the costs of management or marginal negative costs.
- ODFW must not ever arbitrarily cap wolf numbers or include wolf exclusion zones (or do so to address political or social pressure).
- Non-lethal and preventative measures as well as public education and communication must continue to be emphasized, exhausted, and documented (a good-faith effort should be defined as such) before lethal measures are taken. This must be adhered to in implementation.
- Harassment and lethal-take permitees should be educated and assisted in non-lethal preventative measures and their performance should be monitored to inform future issuance of permits.
- Lethal control measures must not take place when unreasonable circumstances – such as carcass piles and poor animal husbandry – exist that invite conflict.
- Lethal take by private citizens should only be permitted in cases of demonstrable self defense or for wolves caught in the act of attacking – not testing, scavenging, harassing, chasing, or other suspicious behavior or for proximity to structures. Changing this part of the plan would make poaching laws nearly impossible to enforce and allow private citizens to take management decisions into their own hands.
- Preventative and non-lethal measures may overlap, but are and should continue to be defined differently
- The exclusion of any “no-wolf” zones should continue
- While it *may* be appropriate to make some clearly defined and defensible adjustments, adjacency language *must not be eliminated*. The restrictive language was put in place intentionally and for very good reason. If adjustments are made, the language must still be restricted so as to ensure any control actions are in fact targeted towards the wolf or wolves responsible for the need for such action. Such a change should be done with the consultation of the original stakeholder committee and all current reasonable stakeholders and
- Recovery goals should not be reduced and must not be statewide. Suitable habitat in Western and Eastern Oregon are separated by significant swaths of marginal habitat. Combining the two could delay delisting in Eastern Oregon or do so prematurely in Western Oregon.

Thank you for considering these comments. We look forward to working constructively with you in reviewing the wolf plan and ensuring it is properly implemented.

Very Sincerely

Rob Klavins,
Advocate, Oregon Wild

Cc: Ron Anglin, ODFW
Craig Ely, ODFW
Russ Morgan, ODFW
Michelle Dennehy, ODFW
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Gentlemen or Ladies:

The Mazamas is a 3,000 member hiking and mountain climbing Portland based organization founded in 1894.

We are aware that Oregon's Wolf Conservation and Management Plan is up for review. Several years ago, we took a position against delisting of the Northern Rocky Mountain Gray Wolf population. In spite of concerns voiced from many conservation groups, this delisting occurred, and the state management plans in Montana and Idaho were then implemented. The result was a trophy hunt.

The historic range of the Northern Gray Wolf once included a region of core interest to the Mazamas, the Oregon and Washington Cascades. After being extirpated from the state, wolves have begun to return on their own, but are now an endangered species in Oregon. We now have two breeding pairs in the state, and upon reaching a threshold of only four pairs - something that could easily occur within a short time, considering the mobility of the Idaho populations - there could be a delisting as the state plan is currently written. This does not represent a viable wolf population. The objective of the wolf plan ought to be a sustainable recovery of this native predator. Meaningful recovery can only be achieved using science-based wildlife management. Management should aim to protect Oregon's native species and ecosystems, not to appease narrow special interests. We therefore urge you to consider implementing stronger protections for Oregon's wolves.

The plan is furthermore severely underfunded, and it ought to emphasize the use of non-lethal tools to reduce and prevent conflicts, including effective communication, education, and outreach. Lethal control should only be an option of last resort.

As the agency charged with managing Oregon's wildlife for the benefit of all, we thank you for accepting our comments. The presence of a healthy, viable population of wolves in an ecosystem is one of the strongest indications of a balanced ecosystem. Please give wolves the strong protections they need.

Very Sincerely,
Pam Gilmer
June 30, 2010

Oregon Department of Fish and Wildlife
Wildlife Division
3406 Cherry Avenue N.E.
Salem, OR 97303
Delivered via: ODFW.Comments@state.or.us

RE: Comments on Oregon’s Wolf Conservation and Management Plan

Dear Oregon Department of Fish and Wildlife:

Thank you for the opportunity to comment on the Oregon Wolf Conservation and Management Plan (December 2005; hereinafter “the Plan”). Please accept these remarks on behalf of Predator Defense as well as our members, most of whom are Oregon residents and all of whom have an interest in wolf recovery in Oregon.

Predator Defense understands that much hard work has gone into development and, more recently, implementation of the Plan, and we appreciate the challenges the state faces in balancing competing interests in those efforts. At the same time, we urge the Department to strengthen the Plan and submit the following suggestions.

1. The Plan’s recovery and management goals should be based on science and restoring wolves’ ecological effectiveness.

The Plan calls for stripping wolves of state protections in each part of the state with establishment of four breeding pairs (and full management at seven breeding pairs). These numbers have no scientific basis. In fact, it’s common knowledge that these numbers resulted from a political compromise. The Department should engage independent biologists to help it determine how many wolves would be required for demographic and ecological recovery in Oregon. Wolves are apex predators and numerous studies have shown that they have significant impacts on the food web, with resulting benefits to ecosystems and ecosystem functioning (see Licht et al. 2010 for an exhaustive list of such studies).

Wolves are native to the Oregon landscape. Before humans exterminated them, they regulated prey species and asserted influences upon vegetation and competing predator species. To truly restore wolves in Oregon, these influences should be present. Demographic considerations are always important, but for keystone species like wolves, ecological effectiveness should also be a recovery consideration (Estes et al. 2010; Bergstrom et al. 2009).
2. The Plan’s relocation provision should be modified.

According to the Plan, wolves involved in depredations can be relocated to nearest wilderness areas; however, much of these areas is not productive habitat for wolves or their prey. Language in the Plan should be changed to allow for relocations that may be appropriate to more distant locations. That said, relocations are not always appropriate and should not be considered the primary solution to conflicts. Predator Defense urges the Department to require livestock producers to take greater responsibility for protecting their stock.

3. The Plan’s language regarding livestock conflict investigations should be modified.

ODFW should clarify language in the plan pertaining to the process ranchers must follow in response to livestock conflicts. Currently, Plan language allows landowners to contact the Department or Wildlife Services. The Department should be the lead agency in charge of investigations, and conflict prevention and response – not USDA-Wildlife Services. Producers should be required to contact ODFW, and ODFW should then lead investigations. Anyone who is familiar with Wildlife Services and the rural West knows that Wildlife Services has an institutional bias towards encouraging producers to take a kill approach to carnivores, not coincidentally protecting the agency’s own self-interest. ODFW needs to ensure a balanced approach to handling wolf-livestock conflicts by asserting its leadership and preventing producers and/or Wildlife Services from taking over the process.

4. The Department should re-prioritize livestock conflict responses towards non-lethal solutions and strengthen response protocols.

Even though no depredations have occurred in weeks, the Department has extended authorization to kill two Imnaha wolves. In so doing, the Department has stated that “the action is limited to an area where previous losses have occurred and to private property with livestock activity.” Yet the area in which lethal control can now take place is well beyond that limit, having been expanded by the Department, seemingly to carry out its wish to appease livestock producers. Moreover, the wolves have since moved upslope into forested areas, eliminating the need (if not to appease vocal minorities) to pursue the wolves.

Electronic signals have not been picked up on the pack’s alpha male in weeks. If the alpha male is dead (as clearly suspected, even by agency personnel) and two other members of the pack are killed, Oregon’s only confirmed breeding pack could be at risk.

The Plan states that non-lethal techniques are the preferred solution when wolf-livestock conflicts are reported, regardless of the wolf population status. Yet, there are no binding requirements that livestock producers take any particular actions, including removal of livestock carcasses. It has been reported that wolves that have killed livestock were drawn in to livestock areas by carcasses.

Predator Defense believes the Department has ignored the Plan and violated OAR 635-110-0100 numerous times by:
   • Failing to issue permits for injurious non-lethal harassment, as required by section 3;
• Allowing injurious non-lethal harassment and lethal response given that livestock carcasses have been present on lands near or where wolves have preyed upon livestock (sections 3 and 5); and
• Issuing permits for lethal response, when there has been no documentation or proof that efforts to resolve the problems have been deemed effective by the agency (section 5 and 6).

The best way to resolve and minimize livestock conflicts is through education and implementation of non-lethal methods, such as guard dogs, shepherding, fencing, fladry, and improved animal husbandry tactics such as removing/protecting animals in greatest jeopardy such as cows and ewes during parturition and young vulnerable animals, and disposing of carcasses, afterbirths or any other attractant to predators. We appreciate the plan’s emphasis on non-lethal control but suggest it be more clearly defined and be required before receiving financial compensation or permits to allow lethal take. Such provisions need to be more stringently enforced by the Department.

Rather than killing wolves, ODFW should:

• Add to conditions/requisites for issuance of non-lethal injurious permits, as follows:
  - Add a requirement for best husbandry practices, and exhaustion of non-lethal controls, including but not limited to fencing, fladry, electronic deterrents, shepherds, guard dogs.
  - OAR 635-110-0010(3)(d) mentions that issuance of future lethal control permits requires documentation of non-lethal methods but this is not sufficient and should be a requirement of non-injurious as well.

• Regarding the condition for lethal take in act of a livestock attack (rancher take permit) and non-injurious take permits that no unreasonable conditions exist to cause / attract conflict: This needs to be enforced more stringently, since carcasses have been seen on properties where take permits have been issued.

• A requirement for documentation of best husbandry and exhaustion of non lethal practices must include the broad area where wolf activity has been confirmed, not just immediate property of depredation BEFORE issuing non-injurious or rancher take permit.

• Permits should have a specific and limited time length as well as specific boundaries which are not be extended as the wolves move away.
  - Non-injurious permits now for entire grazing period need to be shortened, and boundary limitations should be added.
  - Rancher take permits need to have temporal or geographic limits.
  - Chronic depredation take permits (authorized agent take permits) have no mentioned time or space limits and have recently been extended by weekly increments and by boundary as well. There need to be more parameters put in place to restrict open-ended kill pursuits.

We submit that rancher take permits should not be issued until phase 2 has been reached, and lethal take permits should not be issued for public lands.
If the Department’s goal is to stop depredations, as so stated, it should re-double its efforts in prevention by requiring ranchers to bear more of the burden of raising livestock in or near areas where carnivores would reasonably be found. The Department has stated that “By killing the two wolves, wildlife managers hope to send a message to the pack to not kill livestock.” Experience in the Northern Rockies has shown that randomly killing members of wolf packs does nothing to “teach wolves” not to depredate. Further, studies show that indiscriminate killing of wolves from packs can disrupt pack structure. Wolves have evolved under complex family-based social structures, and maintaining pack structure is important for several reasons. Pack disintegration has been tied to a potential for increased livestock conflicts (Rutledge et al. 2010; Treves 2009; Wallach et al. 2009). Management policies should look beyond numbers to biological and ecological considerations.

5. The Department’s temporary rule change is ill conceived and the language is too ambiguous.

Yesterday, on June 29, 2010, ODFW filed a temporary rule change that changes the OAR language guiding lethal responses to wolf-livestock depredation. The rule changes add “in the area” to language pertaining to geographic authority for lethal control. The temporary rule appears to loosen restrictions on the agency authority to focus lethal control in a certain area; for example, if the targeted wolves disperse away from the original depredation site (as the Imnaha pack has). The new rule also allows ODFW to target wolves that depredate “in the area” rather than on or next to one’s property, thus expanding the Department's authority to begin a lethal control process.

No doubt this temporary rule change was submitted to attempt to retroactively justify lethal control activities relating to Imnaha wolves and to provide cover for the Department when Wildlife Services and ranchers maintain pressure to kill depredating wolves, even when the wolves leave the area. The Department is essentially chasing the Imnaha wolves to hither and beyond, just to kill them, even though no depredations have occurred in weeks and the wolves have moved away.

This unfortunate response begs these important questions:

- Will the Department have the courage to let depredating wolves off the hook when spatiotemporal conditions for lethal control no longer exist?
- At what point does the Department simply need to tell Wildlife Services and the livestock producers to accept that sometimes wolves will kill livestock and that this will have to become part of raising livestock near wild areas, because – unless we’re doing it just for revenge purposes – it just doesn’t make sense to chase wolves for weeks or months and tens of miles?

Finally, the language in the rule change request is far too ambiguous; that is, what does “the area” mean? This wording is too ambiguous and allows far too much flexibility in expanding the geographic area for lethal control activities. This temporary rule change is an example of how the Department can lose its grip on wolf management on the slippery slope of responding to special interest pressures. Instead of this particular rule change, we would suggest the Department tighten the rules in the other direction – or simply clarify them – to support the notion that there
will be times when livestock is lost to wolves and that producers need to accept this fact and thus support a strong compensation program.

5. The Plan should provide for a progressive compensation fund that would eliminate producer hardship and the pressure by special interests to kill wolves.

Predator Defense supports implementation of a state compensation fund with funding for compensation at fair market value for livestock losses attributable (confirmed or probable) to wolves. Confirmed with the assistance of authorized agents, use of appropriate non-lethal methods should be documented before awarding compensation.

Ironically, livestock producers themselves have opposed establishment of such a fund. It’s curious that producers would turn down compensation for livestock if the program was designed with their assistance and would accomplish their ultimate goals of receiving money for stock. One might reasonably question whether the issue is not in fact about compensation but rather power and control, and the desire to kill wolves. The Department should respond with leadership that establishes it is in charge and committed to restoring wolves on the Oregon landscape. With an adequate compensation program, wolves should not be killed in response to conflicts.

6. Wolves should not be managed to protect or enhance big game herds.

Predator Defense is opposed to wolves being managed or controlled for the benefit of big game or ungulate populations, and we request that provisions allowing such management be removed from the Plan. Wolves and elk (and other prey) have co-existed for thousands of years, with natural ebbs and flows to population demographics, distributions, and densities. Wolves make ungulate herds stronger by preying upon vulnerable or unhealthy animals (Licht et al. 2010), and numerous studies from the Northern Rockies have determined that the primary impact wolves have upon elk is to make them move around, seek cover, and be more vigilant, which also benefits the plant community (Halofsky and Ripple 2008).

George Wuerthner, ecologist, hunter, and former hunting guide, provides these remarks on the need for wolves to regulate game herds (Wuerthner 2010):

Pro hunting organizations are demanding that wolves be “managed” so they will have little effect upon elk numbers which hunters’ desire. If wolves are going to have an ecological influence upon prey species like elk, they will occasionally reduce elk and other prey numbers in some places at some time. Ungulate populations will often stabilize at lower numbers. Other times they will--over time--rise again. But far too many hunters are impatient. Some hunters will remember the “good old days” when they could blast elk without much effort.

The fear among many hunters is that the few well-documented declines in elk numbers reported here and there will become the norm everywhere unless wolves are actively controlled. There is good reason to believe this will not be the case. It’s important to point out that the vast majority of elk herds are holding their own in spite of the
presence of wolves. Indeed, many elk hunting units in Idaho, Montana and Wyoming have populations that are at and/or above agency objectives despite the presence of wolves and other predators.

Among the changes in Yellowstone attributed to wolf predation that many feel are positive—riparian areas are sprouting new growth. Stems of aspen have seen a reduction in elk browsing and subsequent higher proportion of aspen surviving to become mature boles. Beaver have responded to the increase in willows and aspen and are recolonizing areas where they have not been seen in decades. So as to emphasize the last point, this February I watched a beaver gathering willow at the confluence of the Lamar River and Soda Butte Creek in the park—a place where no beaver has been seen for decades. The presence of wolves has led to a reduction in coyotes. Since coyotes are the main predator on pronghorn fawns, the reduction in coyotes has led to more pronghorn. Wolves also produce carrion throughout the year that supports many scavenger species. Some ecologists have even suggested that extra carrion may help counter somewhat the effects of warmer winters due to climate change (in the past harsh winters killed many more elk and created a lot of carrion). These positive changes and more could only occur if wolves are left to “manage” their own numbers.

Unfortunately, most hunters are single minded about what is important and ecological integrity takes a backseat to “getting their elk.” Not only are elk numbers lower in some areas, but research has shown that elk appear to be more alert and wary, and are moving around more than in the past. All of these changes mean it is more difficult to get “your” elk in some parts of the West these days.

Some hunters spend lots of time studying wildlife. They are willing and able to walk all day, day after day for an opportunity to engage with elk and other prey. These hunters are willing to share the land with wolves and other predators. If you asked them, they would say that the presence of wolves enhances their entire outdoor experience whether they actually kill an elk or not. For many it is more exciting to cross a wolf track than a track of an elk. They put ecosystem integrity and the integrity of the wildlife first and foremost.

I do not want to diminish the contribution hunting and angling organizations have made to wildlife habitat acquisitions that benefit all wildlife species. Over the years hunters have contributed many millions towards acquisition of wildlife habitat. Yet such contributions do not give anyone greater “rights” to public wildlife. And the majority of the public wants wolves back on the land, and they want wolves to be wolves, not some emasculated version of their former self. The main value of wolves is their ecological footprint—how they influence ungulate populations. A few token wolves here and there will not be enough to sustain this ecological influence.
Conclusion

Predator Defense reiterates our appreciation for all the time and effort officials have put into developing and implementing the Plan. At the same time, we believe there are appropriate adjustments that need to be made (as outlined above), and that many of these adjustments would actually alleviate the pressure and difficult judgments the Department must make in the face of especially rancher and sportsmen criticisms and pressure. While we sympathize with the fact that predators have always been a controversial subject in wildlife management, we believe it is the Department’s responsibility to educate people (including those from where the strongest political pressures come) and give greater consideration to well-established principles of ecology.

It’s clear that negative attitudes towards predators from hunters and ranchers still dominate management policies of state wildlife agencies. Unfortunately, current predator management policies of most state agencies tends to reinforce negative attitudes and hostility to predators both in how agencies frame the issue of predators, as well as by advocating indiscriminate control that ignores predator ecology and disrupts social organization. We believe that for the Department to take a balanced approach to wolf management, it must resist the temptation to simply mollify certain political pressures. The Department is already perilously close to losing its independence and leadership on wolf management in Oregon.

We hope that you will consider our suggestions; we look forward to your response.

Thank you once again for the opportunity to comment.

Sincerely,

Sally Mackler,
Oregon Carnivore Representative
Predator Defense

References


Christopher P Schubothe

From: Randall Beatty [Randifashion@hotmail.com]
Sent: Wednesday, June 23, 2010 3:25 PM
To: ODFW.Comments@state.or.us
Subject: Wolf Plan Needs Reform

Please bolster protection for wolves in Oregon through three primary measures:

1. Require the removal or destruction (i.e., rendering inedible) of the carcasses of non-wolf-killed livestock so that wolves are not attracted to areas with vulnerable stock.
2. Eliminate the authorization for killing wolves not caught in the act of attacking livestock.
3. Raise the bar for consideration of taking wolves off the Oregon endangered species list, from the unsupported number of four breeding pairs to a number reflecting the needed distribution within and outside the state to ensure Oregon's wolves' connectivity to wolves elsewhere and the wolves' genetic health.

The 2005 wolf plan is remiss in not requiring disposal of livestock carcasses. Far better to prevent conflict than to scapegoat wolves once they become habituated to domestic animals.

Allowing continued wolf "control" by federal hunters and trappers will forever prove a disincentive to truly seeking to prevent wolf/livestock conflict. It is also likely to prevent establishment of a viable wolf population in Oregon -- particularly as the state of Idaho proceeds to reduce its wolf numbers.

Scientists recognize that hundreds, if not thousands, of breeding animals are necessary to ensure long-term genetic health. Four breeding pairs is setting the bar way too low to consider state delisting.

Hello

They will find any excuse to have the hunt, instead of killing them have the number brought down by removing some of them into other areas where there are a lot less wolves, that seems to be the answer to everything when it comes to animals first option is to start a big hunt and that means from airplanes, any way they can kill them they will think of a way and then the so called hunters take pride that they can shoot them from a plane that way the wolf never knows where it is coming from or better yet maybe the all time favorite in the past ( poison or traps ) how cruel but then what do most humans care and I mean really care about most government agencies fail short of caring about animals just want to sell there tickets for the hunt or maybe better to call slaughter this happens in every state with all animals the wolf is the most hunted animal along with the big cat, well thanks to the government and the way they handle nature some day the only safe place for animals will be the zoos if it is not to late where was Fish & Wildlife to help the ( Carrier Pigeon ) where are they used to be millions now all they are is history thanks to man and wildlife management. Stop the killing be like humans that have a heart not look the other way just because hunter only care about the hunt.

All The Best
Randy

Thank you for your consideration.

Randall Beatty
1325 N.th8th St.
Manitowoc, WI 54220
US
Christopher P Schubothe

From: Randy and Pam Comeleo [rottyler@peak.org]  
Sent: Tuesday, June 29, 2010 6:35 PM  
To: ODFW.Comments@state.or.us  
Subject: Wolf Plan Comments

Please accept our comments below on The Oregon Wolf Conservation and Management Plan.

Thank-you.

Randy and Pam Comeleo  
1475 NW Skipanion Drive  
Corvallis, OR 97330

The target number of breeding pairs in Oregon should be much higher

The conservation population objective in the current version of The Wolf Plan of only four breeding pairs of wolves present for three consecutive years is set much too low. Peer-reviewed research and available habitat indicate that Oregon could probably support approximately 2000 wolves. Larsen and Ripple (2006) estimate that Oregon could support 1450 wolves but there are reasons to believe wolves could be even more successful in Oregon. Oregon has more public land than many other Western states which support very large wolf populations. Oregon’s public land is generally located away from population centers. Montana has the highest wolf population in the western states yet most of its public land is located near population centers. Much of Oregon’s public land is at low elevation along river corridors where prey is abundant whereas public land in other western states with larger wolf populations is mostly high elevation “rock and ice”. Oregon has one of the largest elk populations of the western states found in many areas not considered in the current Wolf Plan. The Oregon Coast Range supports large populations of elk and deer and could possibly support the highest wolf density in the state. Steens Mountain should also be capable of supporting a wolf pack while the entire southeastern Oregon desert probably could support several scattered, small packs. It is unlikely that elk numbers would be significantly impacted by wolf depredation because the lack of significant low-elevation snowpack in Oregon would give elk an advantage over wolves compared to other western states where significant low-elevation snowpack gives wolves an advantage yet elk populations remain healthy. In general, the presence of wolves does not appear to impact elk populations to a great degree — one can cite numerous newspaper headlines from Montana (highest wolf population in the west) indicating that elk are so numerous that Montana is having additional hunts to reduce habitat damage (over-browsing) by elk.

Managing social groups is not the same as managing populations

Predators cannot be managed the same way as grazers — it matters which individuals in a pack are killed. For example, if the state were to set a limit at 100 wolves, consider these two different scenarios:

<table>
<thead>
<tr>
<th>Age Structure</th>
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<tr>
<td>Packs</td>
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<td>-------</td>
</tr>
<tr>
<td>A.</td>
</tr>
<tr>
<td>B.</td>
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</tbody>
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7/13/2010
It would be much harder for the adults in age structure B to feed pups without other adults in packs. Packs must be separated on the landscape so age structure B will need to be spread out over a larger area increasing the potential for conflicts with livestock. Age structure A might be preferable to limit depredation of livestock. An upper limit on wolf numbers in Oregon should not be set. Predators are self-regulating (density dependent) because they depend upon grazer populations - they are not like grazers who eat plants and populations can grow without bounds unless regulated in some way.

**Hunting exacerbates conflicts with humans and livestock by disrupting social structure**

Peer-reviewed research from the WSU Large Carnivore Conservation Lab bears this out. Hunting of wolves is not necessary and should not be permitted in Oregon but if hunting must be allowed, the wolf population must be large and scattered widely before management (hunting) occurs.

**Other areas of concern**

Ranchers should not be permitted to shoot wolves on sight for just being near livestock. There are numerous examples of wolves coexisting in close proximity to livestock, even examples of them walking right by livestock.

The current version of The Wolf Plan specifies that problem wolves must be relocated to the NEAREST wilderness area. Problem wolves should be permitted to be relocated to ANY wilderness area in the state. Problem animals are usually already inhabiting the nearest wilderness area. Relocating may disrupt pack structure but this is better than executing a wolf. Note that this is not importing wolves from out-of-state, just moving them around within the state.
Christopher P Schubothe

From: Richard Weber [rweber37@comcast.net]
Sent: Wednesday, June 30, 2010 9:17 PM
To: odfw.comments@state.or.us; rep.michaeldembrow@state.or.us; senjackiedingfelder@state.or.us
Subject: ODFW Wolf Recovery Plan Comments

To The Oregon Department of Fish and Wildlife, Oregon State Representative Michael Dembrow, and Oregon State Senator Jackie Dingfelder,

I am supplying the following comments in regard to the Wolf Recovery Plan currently in review in the Oregon Department of Fish and Wildlife.

Wolves and other higher predators are a vital part of a healthy, natural ecosystem and desperately need to be allowed to return to our environment. In the recent past they have been systematically eliminated from our landscape and only recently have been allowed to return. I urge you to fully fund a wolf recovery plan that allows them to regain meaningful populations and once again assume their role in nature’s design. These creatures have lived alongside us for millions of years and have as natural a right to live free in the land that they were born in as we do ourselves. Certainly we can continue to live alongside in harmony with these noble creatures as we have for millennium. Please support a full wolf recovery plan that allows for sustainable populations and the ability of wolves to regain their natural role in the ecosystem.

Thank you,

Richard Weber
3820 NE Wistaria Drive
Portland, Oregon, 97212-2830
ODFW's Wolf Management Plan must provide better protection for wolves in Oregon. Wolves are an important and historical part of a balanced ecosystem in our state, and the state government has an obligation to support their recovery.

Wolves should remain on the Oregon endangered species list until the time when their populations are scientifically proven to be sustainable. The current plan's requirement of four breeding pairs is ridiculously low.

Non-lethal methods for discouraging wolves from preying on livestock must be employed prior to lethal methods, which should be a last resort. Livestock owners must be required to remove carcasses of livestock, so that wolves will not be attracted to areas where farmed animals live. A fund should be set up to compensate livestock owners if they can prove that one of their animals was killed by a wolf, so they will not have an incentive to kill wolves.

Thank you for your consideration.

--
Roxanna Lahr
Portland OR
I am commenting on the Oregon Wolf Plan 5-year review.

**Manage Oregon’s wolves for a sustainable population!** This is especially important when the wolf population is as small as it is. Decisions made should favor wolves over other concerns, at least until the wolf population grows.

**Draft clear steps for non-lethal actions into the Oregon Wolf Plan.** There must be detailed and unambiguous steps to follow before the decision to resort to killing wolves can be made.

**When non-lethal measures are undertaken, they must be done across the same geographic area the wolves are frequenting.** We can’t allow a situation where one rancher is issued a permit to shoot wolves when their neighbor hasn’t taken any measures to remove wolf attractants.

**Ranchers must take more responsibility for their cattle now that wolves have returned.** The business-as-usual practices many still use aren’t going to work any longer. **Rancher education is a must.**

**Protect our precious wildlife.**

Sallie Rose Sandler
Good afternoon,

We welcome the return of the wolves to Oregon. The return of the wolves was anticipated when we wrote the Oregon Wolf Plan. Their management program was outlined through negotiation and expectation wolves could re-establish with cooperation of the groups involved. We are concerned this is not happening as provided in the original outline.

Consistency in management practices providing fairness were guiding principles. Sustainability of the populations on either side of the state are important factors, and should be paramount in giving the NE Oregon wolves a chance to establish themselves while educating the people involved. Times have changed and doing things the same way is going to cause conflict. Having spent time involved in ranching issues, new ideas and methods must be introduced for all to live productively. Non-lethal methods must be the primary objective.

We have seen the environmental benefits of wolf introduction into Yellowstone. The positive impact to the ecosystem has been impressive. It is important to keep a sustainable population of wolves in Oregon using non-lethal methods.

Thank you,

Scott Fernandez M.Sc. Biology/ Microbiology

cc Senator Jackie Dingfelder
Subject: Wolf Plan Needs Reform

Please bolster protection for wolves in Oregon through three primary measures:

1. Raise the bar for consideration of taking wolves off the Oregon endangered species list, from the unsupportable number of four breeding pairs to a number reflecting the needed distribution within and outside the state to ensure Oregon's wolves' connectivity to wolves elsewhere and their genetic health. Scientists recognize that thousands of breeding animals are necessary to ensure long-term genetic health. Four breeding pairs is setting the bar far too low to consider state delisting.

2. Require the removal of carcasses of non-wolf-killed livestock so that wolves are not attracted to areas with vulnerable stock. The 2005 wolf plan is remiss in not requiring disposal of livestock carcasses. It is much better to prevent conflict than to scapegoat wolves once they become habituated to domestic animals.

3. Eliminate the authorization for killing wolves not caught in the act of attacking livestock. Allowing continued wolf "control" by federal hunters and trappers will continually provide a disincentive to seeking to truly prevent wolf/livestock conflict. It is also likely to prevent establishment of a viable wolf population in Oregon, particularly as the state of Idaho proceeds to kill off wolves there.

Thank you for your consideration.

Sincerely,

Scott Parker

Newport OR 97365
Dear Sir or Madam,

I have heard your state is currently planning to withdraw the endangered species listing for gray wolves in Oregon. I am saddened by this news. People all over the world are trying to right the wrongs from the past, be they environmental, ecological, or species related. It flies in the face of conservation to believe four breeding pairs of wolves could be considered “recovered” as your plan suggests. If this were not a predator, would you be so quick to delist an animal? If you had four breeding pairs of beavers in the entire state -- would you say it's enough? Would you consider the species safe? Please reconsider.

I realize there is danger to cattle from wolves. But there is danger to cattle from many other sources too, not least of all disease, weather and other predators. Four breeding pairs of wolves will hardly decimate vast amounts of livestock, and I find it difficult to believe they're the only ones going after cows. If it's anything like here, there is a far greater danger to cattle from dogs. I don't know if this may be a solution, but many farmers here run donkeys with their cattle. Donkeys (Jenny's in particular) absolutely hate dogs and they will go after them with a vengeance. If they can defend against Rottweilers, or a Mastiff going after a cow -- chances are a wolf would think twice after being on the receiving end. Isn't it worth a try?

I am not a resident of Oregon. I am not even a US Citizen. I come to the USA for holidays, and a big draw for me and my partner is the wildlife we can see nowhere else. I truly wish to visit every US State, and what I have seen of Oregon makes it rank high on my list of places to visit. Seeing your proposed wolf management plan, I think if you don't reconsider -- I certainly will. You aren't the only state I know of who intends to allow, or already allows, hunting and killing of wolves. Let me assure you, I refuse to set foot into Idaho, and as much as I would love to visit Montana, while this goes on, it is off my list too. Alaska? Yeah, I'd love to visit. But I won't. I give you three guesses why. If anyone asks me if Idaho is a good place for a holiday, I tell them to go to Wyoming instead. Don't make me say the same thing about Oregon, especially not when I was planning to visit either this year, or next year. (I will wait with planning until I see where this is going.)

I'm sure you're making every effort to find a better solution than open hunting, so when I heard you're open to comments, I thought I'll email, even if it's just one voice from far away. I think it's important you know how people far away feel, as well as your residents.

Please understand, I am not against wildlife management. I am not against the right of a rancher to protect livestock. I am vehemently against trophy hunting, which is what this encourages. If the wolf population is out of hand, surely your Fish and Game officers, rangers, etc would be far better suited to keep numbers in check, rather than opening a “free for all” to any trigger happy person who applies for a permit? Surely your employees have a better, and more humane, solution than letting just anyone take a potshot at a wild animal? How many of those wolves are wounded and get away, only to die from their injuries later? Who checks how many are really killed? How many other animals, mistaken for a wolf, are shot and killed? Is it really worth it?

You may save a few cattle and sheep, but at what cost to the other wildlife? After all, it won't be just the wolves who are affected by such a decision. It never is, when there are people and guns involved. I recently watched a BBC documentary about the Druid Pack at Yellowstone. When they were filming them,
there were 37 wolves in the pack. At the end, the voiceover mentioned that since filming, the pack had been decimated by mange and hunting in Idaho and that only one of them is left. ONE.

Keep the wolves on the endangered species list and control numbers internally, without allowing an open hunt. Please.
Your wolves are far more valuable alive, than they are dead.
I've been to Yellowstone National Park three times, just to get a glimpse of a wolf, or a bear, or an elk. All animals I'll never see in the wild here.
Now at least 36 of their wolves are gone, partly because of the hunting in Idaho.
Wouldn't it be better to relocate your wolves to places where they could be protected and integrated, rather than shot and killed? There has to be a better option.

I am not involved with any conservation group, or environmental anything. I'm just someone who likes to visit the wonderful places we have on this planet, and who'd like to see them, flora and fauna, no matter what species, preserved for the future.
Think about Oregon with only four breeding pairs of beavers in the entire state. (And I'd love to see the beavers, too.)
Or eight. Or ten.
I think you'd agree that's not enough. Not even close to enough.
Please change your mind about the wolves.

Thank you for reading.

Respectfully,

Silke Juppenlatz
United Kingdom
PLEASE DO NOT KILL THE IMNAHA WOLF PACK I BELIEVE THAT THEY ARE ESSENTIAL TO ENVIRONMENT AND THE INDIANS. PLEASE RESPECT THEIR HERITAGE. THANK YOU FROM ME AND THE INDIANS TRIBE.

STEVE STRUB
**ODFW:**

- Manage Oregon’s wolves for a sustainable population!

- Draft clear steps for non-lethal actions into the Oregon Wolf Plan.

- When non-lethal measures are undertaken, they must be done across the same geographic area the wolves are frequenting.

- Ranchers must take more responsibility for their cattle now that wolves have returned.

- **Rancher education is a must.**

Steve Zeluck

Portland, Oregon
The alpha male and female are among the Imnaha pack’s four collared wolves. They are the only breeding pair of wolves in the state, and are believed to currently have a litter of 8-week-old pups. The wolves, which have been making their way back to Oregon from neighboring states. There is no stipulation under the kill permits that allow the shooting of collared wolves that would prevent ranchers from killing the breeding pair.

Even if the alpha male is dead, ODFW still has the responsibility to try to prevent further depredation since there has already been six confirmed livestock losses to wolves. Wolves are currently not listed as endangered species federally, but are protected under Oregon’s Wolf Conservation and Management Plan. Help the wolves regain their federal endangered species status in Montana and Idaho, and in the eastern third of Oregon and Washington.

If the wolf is in fact dead, it highlights just how tenuous wolf recovery in Oregon and the need to take a more cautious approach than the one ODFW has been taking by authorizing killing of two wolves in the pack. Make ranchers take preventative care of their livestock with wild predators in mind, as they do in Minnesota consciously and functionally, don't kill wild animals! There is another answer! and that is making livestock ranchers care for their livestock by penning them in at night, obviously. Thankyou, I do not support murdering wildlife, make livestock ranchers care for their stock animals through preventative measures, ie penning them into safety at night, thankyou! It is a saner idea, and works with goats obviously, and would safely and sanely work with cows as well, it is their responsibility to protect their livestock with preventative measures such as penning them in at night or wolf proof fencing on PRIVATE LAND, not public land, the land and earth does not belong to ranchers alone and their corporation business, but belongs to all natives, leave wild animals alone, it is not their fault, ranchers can pen in their stock animals at night to safely keep them alive when wolves naturally hunt, this IS PREVENTATIVE!

stuart philips, eugene, oregon

The New Busy is not the too busy. Combine all your e-mail accounts with Hotmail. Get busy.
Christopher P Schubothe

From: tjpharlan@yahoo.com
Sent: Wednesday, June 30, 2010 10:34 AM
To: odfw.comments@state.or.us
Subject: Concerned about Oregon's wolf population

Dear ODFW,

I am an Oregon citizen and am concerned about fear and profit-motivated approaches to "wolf control." While their presence is objected to by some, I trust that preserving Oregon's rich and complicated ecosystems is your goal as an agency. It is my understanding that you are currently developing a plan regarding these important animals - the following points were not written by me, but I urge you to take them into consideration.

Sincerely,
T. Harlan
tjpharlan@yahoo.com

1. Raise the bar for consideration of taking wolves off the Oregon endangered species list, from the unsupportable number of four breeding pairs to a number reflecting the needed distribution within and outside the state to ensure Oregon's wolves' connectivity to wolves elsewhere and their genetic health. Scientists recognize that thousands of breeding animals are necessary to ensure long-term genetic health. Four breeding pairs is setting the bar far too low to consider state delisting.

2. Require the removal of carcasses of non-wolf-killed livestock so that wolves are not attracted to areas with vulnerable stock. The 2005 wolf plan is remiss in not requiring disposal of livestock carcasses. It is much better to prevent conflict than to scapegoat wolves once they become habituated to domestic animals.

3. Eliminate the authorization for killing wolves not caught in the act of attacking livestock. Allowing continued wolf "control" by federal hunters and trappers will continually provide a disincentive to seeking to truly prevent wolf/livestock conflict. It is also likely to prevent establishment of a viable wolf population in Oregon, particularly as the state of Idaho proceeds to kill off wolves there.

==============================================
Dear Oregon Department of Fish and Wildlife,

My name is Katie and I live in the small town of Newberg, OR. I am currently studying zoology at OSU and am hoping to become a wolf biologist. I recently heard the news that ODFW was going to allow two wolves to be killed because of depredation on livestock and that seven permits were given to ranchers which allowed them to kill wolves caught in the act of biting, attacking, or killing livestock. When I heard this I was APPALLED, not because ranchers were given the power to protect their livestock, but because two of Oregon's only 14 wolves are going to be killed and up to seven others can be killed.

With such a small population, there should be no lethal actions taken against wolves. Even losing just two can severely set back their recovery into Oregon. Depredation by wolves accounts for less than 0.01% of livestock deaths in Oregon and ranchers are reimbursed at full market price for every confirmed wolf kill. Ranchers should be required to use every means possible to protect their livestock before any action against the wolves is even considered. Ranchers can protect their livestock from wolves (and other predators)by using guard animals such as dogs, llamas, and donkeys, patrol their pastures frequently, use rangers to watch their livestock at night, place proper fencing around livestock, using calving and lambing pens, barning livestock at night, properly disposal of caracasses, and tracking wolf packs to prevent conflict before it happens.

Wolves have been known to restore the health of an ecosystem when they are reintroduced to an area. I believe they could do this with Oregon as well. Not only will they heal Oregon enviroments, but they can also bring millions of dollars to the state through tourism. In Yellowstone alone, gray wolves bring in 7-11 million dollars annually and attract thousands of tourists. I strongly believe that, if wolves are allowed to reach a stable and healthy population, they will be able to do the same (if not more) for Oregon. Being good for both the ecosystem and economy, Oregon wolves are worth more alive than dead.

Oregon's Wolf Management Program needs to be GREATLY strengthened so that no lethal actions can be taken against wolves (unless a human is attacked) until the population has reached the high hundreds. I once asked a ecologist how many wolves could live in Oregon at a healthy population and he told me 2200 wolves could live in Oregon. 2200. And we are having problems with 14. The Oregon Wolf Management Program needs to change, and change for the better of the wolves.

Thank you for taking the time to hear my side,
Katie Hick
July 16, 2010

Oregon Department of Fish and Wildlife Commission
3406 Cherry Avenue N.E.
Salem, OR 97303-4924
odfw.commission@state.or.us

Dear Commissioners,

We are writing to express serious concern about permanent adoption of a temporary rule promulgated by Oregon Department of Fish and Wildlife (ODFW) that modified rules governing take of gray wolves in Oregon governed under OAR 635-110-0010. The temporary rule modifies the conditions under which ODFW may issue permits to its personnel, agents or the federal agency Wildlife Services to use lethal force on wolves. Prior to the temporary rule, ODFW had to confirm two depredations on a property or adjacent property, or one depredation plus up to three attempted depredations. The temporary rule changed these conditions to two depredations in the area, or one depredation plus one attempted depredation. We have several concerns with these changes and urge you to not adopt the temporary rule on a permanent basis.

First, as a matter of process, there was no need to make these changes as a temporary rule bypassing public input, particularly when there is an open comment period on changes to the wolf management plan, which would allow changes to be made following consideration of public input. Under Oregon law, temporary rules are only to be used when the agency finds “that its failure to act promptly will result in serious prejudice to the public interest or the interests of the parties concerned.” ORS 183.335(5)(a). In this case, there was no risk of a serious prejudice to the public interest that justifies a temporary rule because ODFW already had a carefully considered plan to address depredations and there was no evidence that it was not working. In the temporary rule, ODFW states:

Failure to act promptly would result in serious prejudice to the public interest and delay in implementation of the Commission's plans and rules, because wildlife management situations (often related to threats to property or human safety, or the proper management of wildlife populations) can arise with little advance warning, requiring prompt action by the Department. Clarifying the legal basis for take now, rather than waiting for permanent rulemaking, would avoid that serious prejudice by ensuring that the Department can move swiftly to respond to wildlife management situations as they arise.

In making these claims, ODFW fails to provide any evidence to show that they were not able to act quickly under the existing rules, nor do we know of any such evidence. Indeed, in 2009 ODFW was able to respond to depredations and to issue permits that resulted in the killing of two wolves that were documented to have been involved in chronic depredations. This clearly indicates that the process was effective in addressing
known problem wolves and a temporary rule was not needed. ODFW’s response to depredations in 2010 has been entirely different.

The purpose of the Oregon Wolf Management Plan is to “ensure the conservation of gray wolves as required by Oregon law while protecting the social and economic interests of all Oregonians.” Recognizing that initially any wolves colonizing Oregon would comprise a small, fragile population, the Plan placed greater restrictions on the conditions under which wolves could be taken until certain population targets were met. With one known breeding pair and approximately 18 wolves, we are very much in this initial phase where caution is justified. ODFW’s actions this year, including promulgation of the temporary rule, have not been in line with the spirit or intent of the Plan, particularly given the fragile state of the state’s current wolf population.

ODFW determined that, between May 6 and June 4, 2010, wolves in the Imnaha pack were responsible for killing six calves in northeast Oregon. Radio telemetry and GPS data establish that none of the collared wolves were involved in these livestock depredations. On May 23, 2010, ODFW issued lethal take permits to five landowners, authorizing them to kill any wolf caught in the act of attacking livestock on their private property (or a legally occupied public land grazing allotment in the same basin where the wolves have been confirmed). On May 29 and June 1, ODFW issued these “caught in the act” permits to four more landowners in the Wallowa Valley. On May 30, 2010, ODFW authorized Wildlife Services to seek out and kill two un-collared wolves from the Imnaha pack. The permit authorized Wildlife Services to kill any two uncollared wolves found anywhere on private property within 3 miles of three separate confirmed livestock depredation locations. Wildlife Services was authorized to kill the wolves without confirming that they had been the wolves responsible for livestock losses. Wildlife Service was authorized to kill wolves regardless of whether the wolves were caught in the act of attacking livestock.

By June 5, Wildlife Services had not killed any of the Imnaha wolves, and ODFW expanded the geographic scope of the lethal take authorization to include an additional fifteen square miles of private land within the Wallowa Valley. With this expansion, the total geographic scope of Wildlife Services’ lethal take authorization is approximately 70 square miles. On June 9, ODFW extended Wildlife Services’ lethal take authorization through June 18. On June 18, ODFW again extended Wildlife Services’ lethal take authorization until June 25. ODFW has not confirmed any wolf related livestock conflicts since June 4, 2010, and has used recent radio collar telemetry data to confirm that the Imnaha pack has moved upslope from the Wallowa Valley onto forested public lands. Nevertheless, on June 25, ODFW again extended Wildlife Services’ lethal take authorization through August 31, 2010.

When ODFW authorized Wildlife Services to lethally remove wolves on May 30, June 5, June 9, June 17, and June 25, under the Plan it was required to have confirmed that a property or an adjacent property had either: (i) Two confirmed depredations by wolves on livestock; or (ii) One confirmed depredation followed by up to three attempted depredations (testing or stalking). The temporary rule changed these conditions to de-
facto allow the permits to be issued. Because the wolves had moved out of the area, were no longer involved in depredations and because ODFW was not able to identify the wolves implicated in the depredations, the permits should not have been expanded and extended in violation of the original Plan.

This rule change has been held out as being merely a clarification of the existing rule, yet it clearly goes beyond that and alters the substance of the wolf plan in a way that this group of conservation organizations cannot support. In particular, the change to “in the area” instead of on a property or adjacent property is vague in combination with lowering the standards for confirming a problem with chronic depredation will allow for the kind of indiscriminate and heavy handed killing of wolves exhibited by issuance of the permits this year.

Because there is no evidence to suggest that the changes proposed in the temporary rule are necessary, because there is an open comment period to allow careful consideration of changes to the Plan in light of public comment and because ODFW does not appear to be following the letter or spirit of the Oregon Wolf Management Plan, we urge you to not adopt any provisions of the temporary rule.

Sincerely,

David Noah Greenwald
Endangered Species Program
Center for Biological Diversity
PO Box 11374
Portland, OR 97211
ngreenwald@biologicaldiversity.org

Josh Laughlin
Campaign Director
Cascadia Wildlands
PO Box 10455
Eugene, OR 97440

Greg Dyson
Executive Director
Hells Canyon Preservation Council
PO Box 2768
La Grande, OR 97850
I saved this in the chain email folder as promised. We received 21,693 of these emails.

-----Original Message-----
From: Josie Chaney [mailto:phelix.josie@gmail.com]
Sent: Saturday, July 03, 2010 11:44 AM
To: ODFW.Comments@state.or.us
Subject: Wolf Plan Needs Reform

Please bolster protection for wolves in Oregon through three primary measures:

1. Require the removal or destruction (i.e., rendering inedible) of the carcasses of non-wolf-killed livestock so that wolves are not attracted to areas with vulnerable stock.
2. Eliminate the authorization for killing wolves not caught in the act of attacking livestock.
3. Raise the bar for consideration of taking wolves off the Oregon endangered species list, from the unsupportable number of four breeding pairs to a number reflecting the needed distribution within and outside the state to ensure Oregon's wolves' connectivity to wolves elsewhere and the wolves' genetic health.

The 2005 wolf plan is remiss in not requiring disposal of livestock carcasses. Far better to prevent conflict than to scapegoat wolves once they become habituated to domestic animals.

Allowing continued wolf "control" by federal hunters and trappers will forever prove a disincentive to truly seeking to prevent wolf/livestock conflict. It is also likely to prevent establishment of a viable wolf population in Oregon -- particularly as the state of Idaho proceeds to reduce its wolf numbers.

Scientists recognize that hundreds, if not thousands, of breeding animals are necessary to ensure long-term genetic health. Four breeding pairs is setting the bar way too low to consider state delisting.

Thank you for your consideration.

Josie Chaney
822 Queen Anne Ave N
Seattle, WA 98109
US
Dear Oregon Department of Fish and Wildlife,

As a supporter of wildlife and their natural habitat, I am concerned about Oregon’s new wolf puppies and the threats they are now facing.

Since the arrival of at least four new wolf pups in the Imnaha pack, it has become clearer that now is not the time to continue with the kill order placed on two of the pack members.

There has been no confirmed depredation caused by the Imnaha pack wolves in over a month and a half, yet the current kill order could once again become active. When the kill order was first issued, Oregon had only 14 confirmed wolves in the entire state. Now that the new pups have raised the population to approximately 18 individuals, it doesn’t change that fact that Oregon’s wolf population is still well below stable. With such a fragile population, even the unnecessary death of two wolves could spell disaster.

Not only could the death of two wolves hurt the entire wolf population, but it could also eliminate Oregon’s largest wolf pack which contains the only known reproducing female, B300, in the state. With the alpha male missing since May 31st, this may be the last litter the Imnaha pack ever has. If the alpha male was killed, the wolves targeted in the kill order could be the ones helping to raise the new pups. Killing even one of the pack’s adults could seriously decrease the pups’ chances for survival. These pups are the future of Oregon’s wolf population. It is extremely important that we do everything possible to help them thrive.

ODFW stated that the kill order would be used to “send a message to the pack”. It isn’t sending a message to the pack; it is sending a message to the people. By extending the order to August 31st, ODFW is telling the people that they will bend to the whims of livestock owners even if it means crippling an already fragile population of wolves.

Please help ensure the survival of these wolf pups by cancelling this unnecessary and dangerous kill order once and for all.

Sincerely,

Michael Heath
Wolf Preservation

I GoodSearch & GoodShop for Wolf Park
Dear odfw;

I just wanted to express my continued opposition to allowing wolves to be hunted and shot for no reason. The wolf is an amazing animal, as I'm sure you know. They mate for life & both mother & father interact with raising the pups. They are an awesome carnivore who, when left to its natural instincts, would much prefer to eat elk & deer, rather than cattle & sheep. They balance out the food chain by removing the weak & sickly, thus assuring a strong vital pack. These, as well as their being beautiful, magnificent animals, are why I believe that Oregon's wolf pack should be protected.

Sincerely,
Margaret E. Boss
710 NW 5th Dr
Canby, OR 97013
Dear Commissioners:

I am writing this as a resident of Wallowa County in NE Oregon, where we are privileged to have a small and constantly threatened pack of wolves. The first in Oregon. The constant and escalating hysteria against wolves in NE Oregon has put more than half of Oregon’s wolves in danger of being exterminated.

This relentless and dishonest media campaign by the Oregon Cattlemens’ Assoc. is aimed at exterminating the Imnaha pack near Joseph. This pack of 10 accounts for more than half of our known wolf population of 14. Ranchers are claiming many calves killed despite only ONE confirmed case of depredation from a population of 36,500 cattle county-wide. Many NE Oregon ranchers have taken no proactive non-lethal measures to protect their livestock, such as the use of fladry, range riders, or burying their dead animals deep enough so as not to attract wolves. Equipment and help to pay for these measures and others are available from Defenders of Wildlife and the ODFW. Defenders compensates all confirmed losses at market prices. The OCA was responsible in 2005 and 2007 for blocking passage of the legislation called for in the OR wolf plan that would have, among other things:

1. amended the Ag Damage statute to allow take of wolves by private citizens under certain circumstances
2. established a compensation/proactive non-lethal fund.

The OCA argued then that folks should be allowed to take wolves under extremely broad circumstances and that they would accept nothing less. They succeeded in killing passage of the very legislation that would have helped them.

Allowing the language OCA wants to introduce to the Wolf Plan would not only take management decisions out of the hands of biologists and wildlife managers, but it would make it next to impossible to enforce poaching laws.

In Idaho last year, where wolves are most numerous in the West, less than 1% of cattle losses were attributed to wolves. Livestock operators can adapt to the presence of wolves, as has been shown in the West and in northern Minnesota, where 3,000 wolves co-exist with cattle and sheep operations.

I earnestly urge the ODFW to:

- Keep wolf management in the hands of biologists and wildlife managers. Allowing individuals the license to kill wolves on their own initiative would lead to widespread and indiscriminate slaughter of our wolves, in many cases of wolves not involved in livestock predation.

- Establish a state fund to assist in providing non-lethal deterrents to wolf depredation including both the necessary hardware and subsidies for the employment of range-riders, and to compensate ranchers for confirmed wolf depredations.

- Raise the breeding pair limit from 4 to 12 to ensure the survival of a healthy wolf population in Oregon.

Thank you,
Sincerely,
Diana Hunter,
541-21-2758

Diana and James Hunter
Barking Mad Farm and Country B&B
65156 Powers Road
Enterprise, OR 97828
541.426.0360 : cell 541-215-2758
www.barkingmadfarm.com and on Facebook

"Never doubt that a small group of thoughtful, committed citizens can change the world. Indeed it is the only thing that ever has"  Margaret Mead

Hotmail is redefining busy with tools for the New Busy. Get more from your inbox. See how.
I am a lifelong Oregonian of 42 years and have spent many a night in Wallowa County of NE Oregon. Although I understand most facets of the private property/land owner's concerns I also strongly feel this issue is not solely about how wolves affect the private property/land owner. I for one welcome the wolf back into the Oregon ecosystem. Since I was young I wished for the day wolves and grizzly bears would inhabit Oregon, but never truly thought it would happen. Now that wolves are starting to return I believe there needs to be a delicate balance between human interests and how to best manage wolves. I have spent many weeks in Yellowstone National Park the past four years and have been lucky to get up close and personal with wolves and wolf packs in remote areas of the park. I have seen a wolf pack hunt, kill and feed on elk in close proximity (50 yards) as well as come face to face with wolves and grizzlies while hiking off the beaten path. The wolves that I have been in the presence of have never, even remotely, posed a threat to me. In fact the wolves and wolf packs I have encountered have been very shy and intimidated by me.

I would now like to propose some ideas to be addressed and hopefully included in the updated Oregon Wolf Plan.

1. A clear distinction needs to be made between wolf management on private property/lands and wolf management on public property/lands.
2. **Wolves that prey on livestock on public lands are protected**, regardless of a person having paid for grazing rights. If someone wants to **buy grazing rights on public land then they take the risks associated with it and there are no guarantees**. Public property/land is as much mine as any ones and if I chose to put my livestock on it then I would accept the risks.

3. **Private property/land owners** must have **permission from ODFW** before private property/land owners are allowed to **kill a wolf or wolves** on the owner's private property/land unless a wolf or wolves are caught in the act of chasing or attacking livestock, pets or people.

Chasing- To follow rapidly: **Pursue** : **Hunt** : to follow regularly or persistently with the intention of attracting or alluring.

Attacking- To set upon with violent force. To begin to affect harmfully.

4. **Private property/land owners** shall be **authorized by ODFW** to kill wolves that are killing livestock on their private property/land more rapidly based on the non-lethal measures the property/land owner has enacted to protect his/her livestock from wolves. For example: If a private property/land owner is using all the recommended non-lethal measures ODFW is recommending to avoid wolves killing livestock and a wolf or wolves kill livestock on that owner's private property/land then ODFW will authorize for that private property/land owner to kill a wolf or wolves on their private property/land more quickly than a private property/land owner who has not enacted all or any of the ODFW recommended non-lethal measures to avoid wolves killing livestock.

5. **ODFW will be solely responsible for the management of wolves in Oregon including confirmation of wolf kills on livestock and wildlife.** In addition, **ODFW will be solely responsible for wolf relocation and/or the killing of wolves involved in chronic depredation. No longer will Wildlife Services or US Fish and Wildlife be involved or have input on any aspect related to wolves in Oregon unless requested by ODFW.**

I believe the above changes/additions to the Oregon Wolf Plan will provide clearer guidelines for private property/land owners, the public and ODFW.

*Thank you for your time,*

Trent

6/17/2010
Dear Oregon Dept. of Fish and Wildlife,

I am an Oregon native, having grown up on a wheat ranch near Condon, and have lived in the mountains of Central Idaho for the past 29 years. I have been around the wolf issue since reintroduction in 1995 and 1996, and especially around wolves themselves in the last decade.

It's essential that Oregon wildlife managers and especially trained wolf biologists make the decisions about wolves, rather than handing it off to ranchers, local law enforcement (like county sheriffs), or Wildlife Services.

There are proven non-lethal, pro-active methods that can keep wolves and livestock apart. Wolves can be hazed away from livestock and learn to be afraid of people, human sounds and buildings. I worked for two seasons as a volunteer for IDFG, hazing wolves and for those two summers, we had no depredations.

But, when the cattle ranchers decided they no longer wanted wolves around because wolves caused more work, and meant that sick and injured cattle could not be left unattended (which is often the case), the ranchers started shooting the wolves or having Wildlife Services come in and trap and kill wolves. That's when things went to hell.

Now, people are angry with the ranchers and want their cattle off our public lands. The same with sheepmen, who refuse to take the necessary measures to keep their flocks safe from predators, esp wolves. We do have a few sheep outfits in Idaho who practice non-lethal methods at all time, and one (Lava Lake) advertises "predator family" lamb. They do a good business in selling their product.

Since delisting in 2009, Idaho wolves are being killed nearly every day. Wildlife Services shot over 100 just in 2009. This is NOT how to manage wolves. There is no longer any effort being made in Idaho or Montana to protect wolves, which is exactly why wolves need to be relisted under the ESA.

I would urge that Oregon show leadership and demonstrate that livestock producers can learn to live with wolves. Otherwise, Oregon will be in the same state of war that is going on here in Idaho and also Montana, between people who want wolves (the majority) and those who don't (main ranchers and big game outfitters).

Please do NOT allow in the Oregon plan, the language OCA now wants to introduce to the Wolf Plan that would not only take management decisions out of the hands of biologists and wildlife managers, but it would make it very difficult to enforce poaching laws.

I also note that the Oregon plan allows for four breeding pairs. This is a laughable low number, it's absurd. There is plenty of good habitat in Oregon for wolves including in the mountains between the coast and C Oregon. At the minimum, the Oregon plan for breeding pairs should be 24 or more.

Sincerely,
Hi ODFW,

I want Oregon to be what Idaho, Alaska and other slaughtering states are not: A welcoming haven for wolves.

Please work with pro-wolf entities to assure that ranchers can be reimbursed for wolves doing what wolves do naturally--hunt--and that wildness in our state is balanced by the inclusion of this natural but badly-maligned species.

Just because humans (top-of-the-heap predators) have overpopulated the planet doesn't mean that humans should be allowed to drive to extinction the wild and much less greedy predators that try to survive our nastiness.

A pro-wolf citizen of the US, that's me. Keep wolf presence out of the political arena, keep 'em alive, don't panic or cave in to those powerful interests who would SLAUGHTER the wolves. Humans aren't more important---at least, they shouldn't be.

L. Gray
Silverton, Oregon
Wolves are an important, vital predator that have a tremendous AND benefit other species of wildlife...Keystone species...Very important predator that needs to be in the forests like they used to be. They keep elk and deer populations healthy and it is scientifically proven that it helps the ecosystems they live in...Wolves don't eat all their food and they don't bury it, letting scavengers (especially birds...Crows, Ravens, Eagles ect..) eat what is available...Makes the deer and elk alert so they don't leave a place they can't have a panoramic view of the landscape...They basically don't overgraze the stream banks because of the ravines and that helps out the beavers, which helps out with the fish because the saplings grow and create shade...Better habitat for aquatic life..

We literally are at war with our own environment...And wolves would be very beneficial...Ignorant hunters will disagree and people will not like the idea, but wolves need to be ALL over their natural historic range..

I would love to see me wolves in oregon, washington, and everywhere they can survive really..

Alexander Holdaway
I support a fully funded wolf plan that allows for a meaningful and sustainable recovery of this important native predator. Please ALLOW for the thriving survival of native wolves and cougars in Oregon, they positively affect ALL native wildlife and plant species in Oregon. Leave them alone, they are part of nature and nature depends upon their flourishing to sustain all healthy populations, livestock industry should adjust to native species, not vice versa. This is the way it should be of course, forever, to keep native populations healthy, and whole, so all native life can thrive, not just ranchers. Thankyou. Stuart Phillips, Eugene, Oregon.
We just wanted to let you know how strongly we feel that Oregon should be a leader in protection of wolves.

Wolves are an awesome species when it captivity, even more so in the wild. They have proven their worth to the eco system in which they live as evidenced in the turnaround in Yellowstone since wolves were reintroduced there. We feel that wolves have a natural place in Oregon and were happy to see their natural reappearance.

Being raised as the caregiver for a flock of sheep, we understand the emotions that come to bare when ranchers lose animals to preditors. However, we also feel there are adequate preventive measures that have been developed to keep stock safe from wolves. Also, there should be adequate compensation to ranchers for proven wolf predation. However, we feel that the emotions connected by ranchers to wolves are way out of scale. It seems to us that stock is in just as much jeopardy from other preditors, such as cougars.

We strongly oppose regulations being instituted such are now in effect in Idaho and Alaska. Again, we feel wolves in Oregon are not currently a major preditation problem and strict enforcement of wolf protection should be in place.

Gloria and Alan Koch
Clackamas, OR
I strongly support a wolf recovery and a strong wolf program. Wolves need to be protected so that they can survive and go on living. I love wolves and this planet would be missing so very much if wolves were not on it. God created wolves and intended that they should be a part of the scheme of things and contribute to nature. If they were not here, nature would be thrown off balance and more problems would result that people would have to contend with. Wolf recovery and a strong wolf program that would protect wolves is of utmost importance to me and is a very necessary part of ensuring that wolves stay alive and live in the best of conditions. Please make a wolf recovery and strong wolf plan a reality so that wolves can have a real chance at living a long full life on this planet. Thank you very much.

Sincerely,

Toni Siegrist
17 Quincy Street
Cambridge, MA 02138
Dear ODFW,

I realize that the below is a form letter. I do agree with all parts. I am not an Oregonian. But my family and I love to travel. One of my favorite places to stop is Northern Minnesota due to the possibility of hearing a howling wolf. We own and operate a campground in the Northwoods and realize that the balance between our worlds, and that of the wolves is imperative for a natural sustainable ecosystem. I am concerned as to the survival of the wolves in Oregon. My brother has moved to Oregon and we had hoped to include that in as one of our destination points. If you don't have wolves, it will not. We do not have a greater right to exist than wolves. And our domesticated animals are not more important than non domesticated. It is about balance. Please think about the true consequences of your decisions.

As you review Oregon’s Wolf Conservation and Management Plan, I urge you to consider implementing stronger protections for Oregon’s wolves.

After being extirpated from the state, wolves are now an endangered species in Oregon. The objective of the wolf plan ought to be a sustainable recovery of this native predator. Meaningful recovery can only be achieved using science-based wildlife management. Management should aim to protect Oregon’s native species and ecosystems, not appease narrow special interests.

Wolf recovery numbers are far too low—4 breeding pairs is not enough to ensure a meaningful and sustainable recovery. What's more, the plan is severely underfunded.

Finally, in implementing the plan, ODFW must emphasize the use of non-lethal tools to reduce and prevent conflicts including effective communication, education, and outreach. Lethal control should only be an option of last resort.

As the agency charged with managing Oregon’s wildlife for the benefit of all, I thank you for accepting my comments. Please redouble your efforts towards restoring balance to Oregon’s ecosystems by giving wolves the strong protections they need.

Very Sincerely,

Melissa Markgraf
W8979 County Rd K
Elcho, WI 54428
July 19, 2010

Ron Anglin, Wildlife Division Administrator
Oregon Department of Fish & Wildlife
3406 Cherry Avenue
Salem, OR 97303

Dear Mr. Anglin:

On July 15th, I met with Craig Ely, Northeast Supervisor for the Oregon Department of Fish & Wildlife (ODFW), who is serving as the principal writer for the revision of the 2005 Oregon Wolf Plan (2005 OWP) to go over Wildlife Services' (WS) comments and information concerning the proposed revision. I want to thank Craig for the time he took to explain the revision process to me and to listen to WS’s comments and information I provided. As I told Craig, WS will continue to provide information to him during the OWP revision process that likely will address livestock predation in Oregon, WS’s current structure and capabilities, as well as literature that can add to the science and understanding of wolf conservation. I understand that, in addition to WS, ODFW has also met with at least 14 other entities to receive input and comments on the proposed revisions to the OWP, including stakeholder groups representing agriculture, wolf conservation advocacy groups, Tribal entities, and other state and federal agencies, and has also extended an open invitation to the public to provide written comments on the revised OWP. It is also my understanding that ODFW will provide WS with a draft document describing WS’s comments offered during our July 15th meeting for my review to ensure their accuracy prior to finalizing such comments for inclusion in the OWP revision file, which I appreciate. WS further appreciates being included in ODFW’s extensive outreach efforts.

In conjunction with submitting these comments on the proposed revision of the 2005 Oregon Wolf Plan (2005 OWP), WS wishes to advise you as an initial matter that, after further deliberation, it has been determined not to carry out any more kill authorizations issued by ODFW pursuant to the plan at least until WS has completed and considered additional environmental analysis under the National Environmental Policy Act (NEPA). More specifically, WS intends to analyze the effects of further potential implementation of authorizations issued under this plan, as it is revised if possible, in the context of an environmental assessment. It is our reading of the current version of the 2005 OWP that, during the conservation phase (Phase I) of the plan, ODFW is still able to continue to carry out on its own any kill authorizations that it issues in the event chronic depredation, and that private livestock producers may also conduct lethal control under “Caught-In-The Act” permits issued by ODFW.
Particularly in light of WS's determination described above, it would be helpful to WS in preparing its further analysis for ODFW to affirm or clarify its understanding in this regard and, more specifically, to identify any agencies or entities other than WS that ODFW may authorize and intend to use to carry out lethal control actions on wolves responsible for chronic depredation under the revised OWP.

Respectfully Submitted,

[Signature]

David E. Williams
State Director

CC: Craig Ely- ODFW, NE Regional Supervisor