

Exhibit E
Oregon Wolf Conservation and Management Plan
Supplemental Public Correspondence

**Public correspondence received
as of September 27, 2010**

Public Comment Phone Calls Relating to Grey Wolves

Date Received	Name	City	Comments
9/14/10	Christopher Michaels	n/a	Wants the Commission to strengthen protection in the Wolf Management Plan.
9/14/10	Robin Bubay	n/a	Urging Marla to endorse protection of grey wolves.
9/15/10	Sylvia Medeiros	Ashland, OR	Work toward protecting grey wolves.
Comments received after September 14 and through September 27			
9/16/10	Carolyn Kohout	Hillsboro, OR	It is important to integrate all of wildlife. Pressures from Cattleman and Farm Bureau. There is a need to identify other ways to keep their animals alive. There is no other natural prey to eat; make natural prey available to them. Balance of nature, humans shouldn't interfere.
9/23/10	Victoria Finley	n/a	Would like to see continued strengthening of protection for grey wolves; "protect the grey wolves."
9/23/10	Steve	n/a	Would like to see the plan to be more natural; not a plan that opposes having wolves in Oregon. More cattle are killed by cars a year than my wolves. There is not a plan to regulate cars that kill cattle. No wolf Hunts.
9/27/10	Kevin Siren	n/a	Strengthen protection in the Wolf Management Plan.

Christopher P Schubothe

From: scottnsandrac@aol.com
Sent: Wednesday, September 22, 2010 10:47 PM
To: odfw.comments@state.or.us
Subject: Oregon Wolves

I am writing this in the hope that my voice will be heard on this topic. Wolves are an endangered species in many areas of the U.S. Because of blatant lies and mis-information being spread by anti-Wolf organizations this is now a concern again. I am imploring you to keep the Wolves safe. There are arguments on each side that are valid but what it comes down to is that ranchers need to watch their herds better or put up better fencing. The Wolves did not invade the Rancher's space, he invaded theirs and now wants them gone because they say the Wolves are killing their livestock. Published reports show that Wolves kill 1% of livestock and the rest die from disease, malnutrition, etc. Please support the Wolves in Oregon and don't let the anti-Americans sway you. It just isn't right to have a "Wolf hunting season", I could see it if they were a threat to humans but 99% of them are not where-as domesticated animals such as the Pit Bull has killed thousands of humans and is still being bred and sold in the U.S. The Wolves are all being ran out of their territory so Man can build more and more and take away more and more of our natural resources, this wasn't an issue until Man decided to take over territorial land and start ranching for the money. I can't wrap my mind around these disgusting inhumane practices in other States such as Alaska, Montana, Idaho, etc.

Thank you for your time.
Sandra Cannon



Oregon State Grange

August 23, 2010

TO: Oregon Fish & Wildlife Commission

FROM: Oregon State Grange (OSG)

SUBJECT: Oregon Wolf Conservation Plan

The Oregon State Grange (OSG) developed written policy in 2003 opposing the "introduction and migration" of wolves and wolf hybrids. The policy reads: "The Oregon State Grange is opposed to introduction and migration of wolves and wolf hybrids in Oregon." In 2009 they passed policy that states: "The Oregon State Grange firmly believes that ranchers should be allowed to kill a gray wolf that is killing or threatening to kill any livestock or pet and supports any legislation that would allow such."

This year the OSG passed policy stating: "That the Oregon State Grange actively participate to help the livestock industry get their recommendations passed by the Oregon Fish & Wildlife Commission and the Oregon Legislature in the effort to mitigate and eliminate livestock loss due to wolves in Oregon," and further resolved, "That the Oregon State Grange actively participate to help the hunters and wildlife advocates get their recommendations passed by the Oregon Fish & Wildlife Commission and the Oregon Legislature in the effort to mitigate and eliminate excessive elk and deer population reductions due to wolves in Oregon."

The OSG is on record with the F&W Commission and the Legislature, by participating with and advocating for the livestock industry in Oregon, and they continue to do so by supporting the recommendations presented to the F&W Commission by the Oregon Cattlemen's Association for amendments to the Oregon Wolf Conservation Plan.

It is the recommendation of OSG to vote for passage of the listed recommendations by the Oregon Cattlemen's Association in an effort to immediately reduce and eliminate wolf predation of livestock, elk and deer in Oregon. This action would provide an assurance to the livestock producers, big game hunters and wildlife enthusiasts that the Oregon F&W Commission is better prepared to manage future wolf conflicts and predation when the wolf is once again delisted in Oregon.

Sincerely submitted,

Larry Rea, State Master
Oregon State Grange

America's Family Fraternity

From: Rob Klavins [mailto:rk@oregonwild.org]
Sent: Friday, September 24, 2010 12:28 PM
To: odfw.comments
Subject: Oregon Wild Comments on Wolf Conservation & Management Plan

Dear ODFW Commission Members,

Please accept the attached comments on behalf of Oregon Wild. Based on the assumption that we won't see any substantive weakening of the plan in the last few days of what has been a long process, these are likely to be our final organizational comments. They should be considered to augment, but not replace our previously submitted comments which can be found here:

September 2nd written comments:

http://www.oregonwild.org/fish_wildlife/bringing_wolves_back/9_2_2010_Oregon_Wild_Comments_on_Suggested_Changes_to_Oregon_Wolf_Conservation_-_Management_plan.pdf

Summary of June 24th written comments:

http://www.oregonwild.org/fish_wildlife/bringing_wolves_back/Summary_of_Oregon_Wilds_Comments_on_Wolf_Plan_Review.pdf

We appreciate the opportunity to have been involved in this process. The volume of comments submitted to the Commission demonstrates clearly that Oregonians care deeply about native wildlife generally and about wolves in particular. It is also clear from the substance of those comments that the vast majority of Oregonians value wolves and believe they should be allowed to make a meaningful recovery in the state. Since ODFW is charged with managing the states wildlife for the benefit of all Oregonians, we maintain that if anything, the Oregon Wolf Conservation & Management Plan should be strengthened to ensure a full, sustainable, and meaningful recovery for the native predator guided by the best available science.

As our comments point out, we believe the plan continues to fall short of that goal. However, we also appreciate that this process was meant to be a review and not a rewrite of the plan. Though we continue to honor the spirit of compromise the plan embodies, we do have concerns with some proposed changes as well as with others that were suggested and ignored. We hope you will consider those concerns and expect the agency will implement the plan in a manner that follows the letter of the law and more importantly also honors the spirit of the plan.

Oregon has a great opportunity to lead the way in showing that there is a place on the western landscape for both humans and meaningful populations of wolves. We hope the lessons learned over the past year will inform better future conservation and management decisions so when we embark on the next review of the plan, we'll be discussing a wolf population of more than 21 individuals and 2 breeding pairs. We also hope we'll be able to continue to do so as constructive partners working collaboratively with the agency and other reasonable stakeholders.

Very Sincerely,

Robert Klavins

Roadless Wildlands Advocate, Oregon Wild
503.283.6343 x210
rk@oregonwild.org
www.oregonwild.org

Grab your camera and hit the trails. The 6th annual Oregon Wild Outdoor Photo Contest is here. One stunning photo could win you great prizes. Find out more: <http://tiny.cc/OWPhoto>



**OREGON
WILD**

Formerly Oregon Natural Resources Council (ONRC)

www.oregonwild.org

September 23, 2010

To: Oregon Department of Fish and Wildlife Commission

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

Dear Commission Members,

Please accept the following comments concerning proposed changes to 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 waters as an enduring legacy to future generations. 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 protection of species whose populations are threatened or unnaturally low by protecting and restoring habitat and advocating for science-based management designed to recover populations to meaningful and sustainable levels.

Our comments today do not replace, but instead augment those dated June 24th and September 2nd. We hope those comments will be fully considered. However, after attending the September 2nd Commission meeting and reading additional materials disseminated to the public by ODFW, we wish to add these - likely final - additional comments.

Though five years have passed since Oregon's Wolf Conservation & Management Plan was created through an exhaustive public process, its provisions have only really been put to the test for about one year when wolves were not listed as a federally endangered species. Events that took place during that time demonstrated clearly that the plan gives the state more than enough tools to deal with "problem" wolves and address concerns of those who favor lethal control. In 2009, 2 wolves, which then represented nearly 20% of the state's known population, were killed in response to depredations. In 2010, wolves killed 6 calves and a less-specific, but similar kill authorization for 2 more wolves was given.

Though a vocal minority of powerful stakeholders would like to see changes to the wolf plan that make it easier to kill wolves, it is clear from the response to the events of the last year as well as by the volume and content of public comments that most Oregonians care deeply about wildlife generally and wolves specifically. They value wolves and believe they should be allowed to make a meaningful recovery in our state. Sadly the events of 2010 also made it abundantly clear that misinformation and fear still abounds in some parts of the population.

The Plan represents a compromise between stakeholders and codified major concessions from conservation interests and the majority of Oregonians who value wolves and native wildlife. We maintain that the plan represents a political and social compromise, but *not* a science-based recovery plan. We would be remiss not to again state that we believe the plan should be strengthened. However, we also believe it is important to honor the spirit of collaboration the plan embodies and will not again restate substantive changes we believe are warranted. In that spirit, we are appreciative that for the most part this has been a public review process and not a major revision of the plan. We continue to be concerned about some changes that have been proposed as well as others that have not been made.

Please accept and seriously consider the following additional comments to proposed changes to the wolf plan as of today's date and consider them as supplemental to our comments submitted in June and September.

New Issues of Concern:

1) Non-Lethal Injurious Harassment:

Both within and outside this review process, agricultural interests have lobbied to allow lethal take of wolves due to proximity to structures or unverifiable behaviors such as chasing, harassing, or threatening livestock. For all the reasons outlined in previous comments, we oppose such a major undermining of critical wolf protections. ODFW was wise to reject such calls. We are less concerned about ODFW loosening restrictions for harassment of wolves designed to prevent conflict. As we understand it, changes made to what behaviors can allow for non-lethal injurious harassment will have no effect on parameters for lethal take. We hope that clarification will be explicit.

2) Unbiased information:

We believe the best available science should guide management decisions towards meaningful and sustainable wolf recovery. We also believe that any economic analysis included as part of the plan should be unbiased. We are concerned that economic analysis has focused disproportionately on the negative impact of wolves and are extremely troubled that economic data has been solicited exclusively from industry interests who continue to provide false and biased information to support their positions.

3) County Official involvement:

We agreed with Commissioners and staff at the September meeting that training for county officials in securing a depredation investigation scene and preserving evidence made sense. However, we believe it would be a mistake to allow anyone other than trained ODFW staff to take steps to independently carry out an investigation to identify the cause of a depredation.

Continued Major Concerns:

1) “Adjacency” vs “In the Area”:

This is a substantive weakening of the wolf plan and a solution in search of a problem. We remain troubled that the change was originally made outside of this review process and unnecessarily undermined the public trust. More currently relevant, we remain concerned that though designed to increase clarity, the proposed solution has - in all its iterations - had the opposite effect. Further inspection has revealed it to be entirely unnecessary.

In our initial comments, we were sympathetic to the concerns of agricultural interests that “adjacent” properties could be read as too restrictive. We agreed that clearly defined and defensible adjustments made with full consultation and input from stakeholders could be appropriate. However, we also asserted the language was put in place intentionally and for good reason – to ensure lethal control is targeted at individual wolves that are habitually and verifiably depredating on livestock on private land.

The current definition of “in the area” now reads “where ODFW has determined the presence of the depredating wolves”. The definition is circular – “in the area” is used to define which wolves are depredating. If implemented, it would also have real and negative consequences for wolf conservation and management. The events of 2010 provide a good example. After six confirmed depredations, ODFW staff could say with certainty that some individual wolves were *not* responsible. However, they could not declare with certainty which wolves *were*. Under the most current definition, non-depredating wolves could have been killed many miles away. Especially with such a small population, killing the wrong wolves could have created many more problems for wolves, humans, livestock, and the agency.

Upon further legal analysis, we understand that “adjacent” *does not, as understandably feared by some stakeholders mean contingent properties. It means “situated near or close”.* We understand that in defining chronic depredations, it is difficult to achieve a balance between being overly restrictive or arbitrarily vague. “Adjacent” *does in fact find a happy median. Several months of tinkering with defining “in the area” have not yet produced a mutually satisfactory result. “Adjacent” does in fact achieve the plans goal and should therefore be reinstated.*

2) Education:

Wolves continue to be the focus of a campaign of fear and purposeful misinformation. As the compromise wolf plan attests, the public perception of wolves is critical in determining management decisions and their ultimate recovery. Though the vast majority of Oregonians value native wildlife, wolves remain a polarizing issue. When the public perceives two sides of a debate, even if one side is providing valid facts and the other is willfully misinforming the public, it can be difficult to make the distinction. It is therefore critical that ODFW play a role as a trustworthy, credible, and active source of information.

We are pleased that under this review, most parts of the wolf plan have seen increased funding. Educational objectives however, have been redacted, and the outreach budget has been halved. *Educational objectives should be made more ambitious and the outreach budget should be increased. At an absolute minimum, educational objectives and the outreach budget should be maintained.*

ODFW must also begin again updating the monthly wolf page that has been dormant for nearly a year. Without it, the public record on the history of wolves and wolf management in Oregon is incomplete and left to newspapers, blogs, and unchecked rhetoric.

3) Private property rights:

The ubiquitous change allowing the killing of endangered wolves on private property without notification or approval of landowners is inappropriate and perhaps legally problematic. Our September 2nd comments identify what we believe to be an appropriate middle ground between quickly addressing immediate concerns and appropriately addressing legitimate private property rights.

3) Private vs. Public land:

Our original comments address this issue much more thoroughly. It is understandable that this is an issue ODFW says it does not want to address. However, changes such as those on page 58 adding public lands to the areas in which endangered wolves may be killed by private citizens does in fact address the issue and does so in a way that is entirely inappropriate and runs counter to the public's desire.

5) "Unreasonable" vs. "Identified" Circumstances:

Per our comments dated September 2nd, 2010, we are generally supportive of changing the language from "unreasonable" to "identified" and agree that kill permits should not be granted to those who refuse to remedy them. However, while recognizing that it would be impossible to create in advance an exhaustive list of circumstances that could be identified further clarification is most definitely needed. As currently defined, identified circumstances could in fact allow negligence or oversight to justify the killing of endangered wolves. *If this change is to be made, ODFW needs to provide further clarity on what type of circumstances will be identified, what constitutes reasonable investigations by staff, what will trigger ODFW to advise the landowner to remedy, what will be the process for documentation and public notification? Without such clarifications, the agency may be inviting further uncertainty, conflict, and litigation.*

Positive Changes, Clarifications, and Rejections:

- Clarification of roles in determining depredations was desired by all. We applaud ODFW for asserting its primacy. Wildlife Services is at best a discredited and unhelpful partner, and at worst has demonstrated itself to be willfully negligent in determining depredations. Wildlife Services is a predator control agency with uncomfortably close ties to biased interests. *ODFW should stand by this decision and go a step further by standardizing and enumerating the training and protocols required for investigating, documenting, and determining causes of depredations in all phases of its own plan.*
- The agency was wise to reject continued requests for wolf-free zones, further reducing or combining recovery goals, capping population numbers, or allowing lethal take for unverifiable behavior such as chasing or harassing.
- We applaud staff for finding an appropriate middle ground in clarifying relocation language. Previous language made the tool essentially useless. New language allows the agency to have one more tool to turn to before authorizing the lethal take of wolves. Especially in early phases of the plan this is wise and would only be objectionable to those with a desire to simply kill more wolves.

Specific Notes:

Considering the level of specificity of suggested changes in the plan, we were surprised to see the following suggestions ignored and hope they will not again be overlooked:

- As the plan correctly states, wolves are not a threat to humans. The addition of the statement that healthy wild wolves have been implicated (investigators were not unanimous in the determinations) in only 2 human deaths since 2005 on the entire continent is a true and welcome addition to the plan. However, it is equally true, based on McNay 2002 and others that healthy wild wolves have been implicated in only 2 human deaths since *before 1900* on the entire continent. Choosing to start the clock at the first very rare incident instead of the full breadth of knowledge is arbitrary and does not sit well with those seeking full disclosure of factual information. *We hope the sentence will be changed.*
- The last wolf bounty was paid in 1947, not 1946 as the plan states. Also, dead wolves were found in Baker County in 1974 and 1978. *This information should be updated in the plan.*
- The beginning of the wolf plan has been entirely redacted. Though it does not provide clear instruction to wildlife managers, it does not make any directives any less clear. It is however, the most accessible and readable part of the document for the majority of the public. The redacted section appropriately and understandably frames the goal of the plan and explains the process by which it came about. *At a minimum we hope this section will be retained as an addendum.*

General Points:

- Funding – if the goals of the Wolf Conservation & Management Plan are met, the wolf population will grow and demands on the agency may as well. Especially in light of their relative contribution to Oregon's economy and culture, non-game wildlife programs are already woefully underfunded. Oregon Wild supports increased funding for these programs and stands ready to aid the agency in advocating for its own programs.
- Compensation – As an act of good faith, conservationists actively supported a compensation program for those individuals who could see limited economic loss if wolves returned to Oregon. Though that effort was undermined by the very interests it sought to appease, Oregon Wild will not stand in the way of an appropriate compensation program that does not incentivize bad behavior or unfairly burden taxpayers – the majority of whom support wolf recovery, see a positive benefit to the return of the native predator, and may not wish to subsidize profit-making activities on public lands.
- Species prioritization – Our previous comments address this more thoroughly. We believe conservation and management efforts should be focused first and foremost on those native species – like wolves – that are endangered, under threat, at artificially low numbers, or controversial. The wolf plan is flawed in that in many cases it flips this prioritization on its head. Changes in population in other species should not require lethal control of wolves or other native species unless 1) a decline occurs in a species such that its existence is threatened across a large area and 2) it can be proven that wolves are in fact a primary cause of said decline.
- Science-based management – Ecological science and specifically the study of unpersecuted predators is a relatively young field. The best available science should guide and inform management decisions or at least be acknowledged. The plan should be updated to include it. Many prominent studies continue to be conspicuously absent from the Wolf Conservation & Management Plan including those that demonstrate the positive impact of wolves and refuting much of the misinformation put forward by anti-wolf interest. We again offer that we would be pleased to provide the agency with some of these studies.
- Non-Lethal vs. Lethal – Non lethal *prevention* of conflict should take precedence at all times and phases of the wolf plan. We have seen that conflict can be magnified by those trying to manufacture a crisis. During such times, it can be easy for staff to focus strictly on crisis management. Doing so only undermines the long-term goals of the plan. Even during those times, the public expects educational, non-lethal, and monitoring efforts to be at least co-equally implemented with other parts of the plan.
- Value of Wolves, standing of stakeholders – ODFW's analysis of the impacts of wolves focuses heavily on the negative potential impacts. We hope the agency will spend equal energy and demonstrate equal passion for analyzing and recognizing the positive value of wolves. Similarly, the agency must recognize the equal standing of all stakeholders in wolf conservation and management – not just those who directly profit from that management or live in the closest proximity to the animals being managed.

- Specificity of depredation – Especially during the early phases of the plan, even if chronic depredations are occurring, it is critical that the agency identify the specific wolves responsible before authorizing any kill orders. Killing a significant portion of the population that is not depredating to “send a message to the pack” or to satisfy a social desire may cause *more* problems by disrupting pack dynamics and eliminating wolves who have already gotten “the message”. Such efforts may satisfy temporary local concerns but will ultimately not benefit wolves, humans, livestock, or the agency.
- Effects on other wildlife – Wolves will certainly have an effect on the numbers and behavior of other native wildlife. In some cases this may mean hunting and wildlife viewing will be more difficult. In others it may increase opportunity. Though it is likely to be of concern, a real or perceived decline in other species does not necessarily constitute a crisis or demonstrate that wolves or other native predators are the culprit. Recent studies by Idaho Fish & Game and others confirm as much. The economic analysis that a reduction in game will be met with a one-for-one reduction in hunter dollars is specious and likely to be offset by an increase in interest in activities by hunters and non-hunters alike who embrace carrying out their activities in a landscape with all its parts.
- Relisting – The triggers for relisting wolves are inadequate. If wolves fall below management objectives, the remedy of relisting should be clearly mandated and swift.

Our comments are based upon the expectation that the review process has been a fully public and transparent one and not a revision. Our support for the process and its result is contingent upon that assumption and we expect that no new substantive weakening of the plan will be made in the final days of what has been a long process.

Thank you for considering our comments. Where necessary we are happy to provide further clarification. The elimination of wolves from Oregon – a state that prides itself on its love for wildlife, wildlands, outdoor culture, and conservation ethic – is one of our greatest environmental tragedies. We look forward to working with the agency towards the goal of re-establishing a meaningful population of wolves in the state while avoiding unnecessary conflict and controversy. Over the next 5-years we hope we can work constructively with the agency and other stakeholders to help implement the Wolf Conservation & Management plan and other wildlife programs towards that goal and we again reiterate our willingness to collaborate with any other reasonable and willing stakeholders.

Very Sincerely,

Robert Klavins
Advocate, Oregon Wild

Cc: Ron Anglin, ODFW
Craig Ely, ODFW
Russ Morgan, ODFW
Michelle Dennehy, ODFW
Meg Kenagy, ODFW
Richard Hargrave, ODFW
Mike Carrier, Governor’s Office
Representative Brian Clem
Senator Jackie Dingfelder



September 1, 2010

Dear ODFW Commissioners,

As you consider your final recommendations to ODFW staff on the Oregon Wolf Plan five-year review, Hells Canyon Preservation hereby submits further comments on the five-year review. These comments are in addition to our earlier comments dated June 30, 2010, and are largely in response to ODFW's Staff Summary of Policy Issues Raised by Stakeholders, dated August 6, 2010, along with specific proposed edits to the Wolf Plan and the associated OARs.

Process

We understand the Oregon Cattlemen's Association has been persistently lobbying the ODFW Commissioners behind closed doors in order to obtain some fairly major alterations to the Oregon Wolf Plan. We want to compare and contrast that approach to the public and open approach taken by the conservation community and other stakeholders.

The Oregon Wolf Plan was drafted after a two-year open and public process in which all stakeholders had a voice. Now, one stakeholder group wants to alter that plan with private and closed-door negotiations. This is an unacceptable approach. If any major changes are to be made to the Oregon Wolf Plan, it is imperative that they are achieved through a similar process to that by which the Plan was originally drafted: a public and open process that involves ALL stakeholders.

Even if there is some agreement by ODFW Commissioners with the OCA's lobbying points, we strongly recommend that instead of implementing those suggestions in this 5-year review process, you reconvene the Wolf Advisory Committee and commit ODFW staff to working with that committee in what would likely be a 1-year or more process. The key to a strong Wolf Plan is that it has broad public support. Plan changes that implement just one stakeholder's edits without counter-balancing the concerns of stakeholders are bound for a rocky future.

Land Adjacency

We are very concerned at the proposed change in the adjacency language, especially as it is based largely on a misinterpretation of the word "adjacent" and would instead merely require chronic depredation events to be "in the area." There has been a presumption that the word "adjacent" means properties whose boundaries touch, and that therefore ODFW

has been limited in declaring a chronic depredation situation when depredation events occur on nearby, but not touching, properties. In fact, “adjacent” can mean “situated near or close.” Expanding this language to “in the area” without any further qualifiers undermines the intent of the original Wolf Plan language, and alters it substantially.

In addition, “in the area” is such a vague term that attempting to implement it will just beg for dispute. We are under the impression that the goal of this revision process is to clarify the language of the Wolf Plan, not to muddy it. Changing the adjacency requirement to “in the area” language—especially without any qualifiers or explanation of what “in the area” means—is guaranteeing future implementation issues.

It is disconcerting that the OARs presented for yours and the public’s review incorporate the new “in the area” language without comment, as if the new language is automatically already part of the permanent OARs. We have already expressed our strong dismay at ODFW ‘emergency’ rulemaking on this language in previous letters. We feel it was unnecessary and particularly offensive given the controversy at that time regarding ODFW’s issuance of caught-in-the-act and take permits. We ask the Commission to revoke that temporary rule and leave the adjacency language as is, or if there is a need to clarify the adjacency language, at least be specific about the area involved.

Preventative/Non-Lethal Action

We have no objection to “preventative” measures taken by landowners counting towards issuance of caught-in-the-act permits. However, it would be a major expansion of the Plan to allow landowners who have undertaken *only* preventative measures to be issued caught-in-act permits. The intent of the Plan is to progressively escalate responses in reaction to wolf activity. That progression is: non-lethal non-injurious, non-lethal injurious, then lethal. We have no objection to adding “preventative” measures at the start of that progression, as long as preventative measures are not substituted for other measures.

The use of non-lethal injurious actions has largely been ignored in recent wolf responses. Yet these actions are perhaps the most effective in keeping wolves away from livestock and certain specific locations such as ranches. We would prefer a clarification of the Plan that required both non-lethal non-injurious *and* non-lethal injurious actions to be deemed ineffective before a caught-in-the-act permit can be issued, while also giving leeway to ODFW staff to make that determination.

Relocation and Translocation

It is important for the integrity of the Plan that both of these measures stay intact. We agree with staff recommendations that suggest relocation to “suitable habitat” be substituted for the “nearest wilderness.” The Keating wolves situation made it clear that the intent of the original Plan could not be met with the current “nearest wilderness” language. Yet to remove these components from the Plan entirely would alter it so dramatically as to require

a comprehensive review of why these measures were incorporated into the Plan and the role they serve in the overall management of wolves in Oregon—and such a review is likely beyond the scope of this process.

Population Criteria & Delisting Criteria

We cannot stress strongly enough that this is not the forum for altering such fundamental concepts of the Oregon Wolf Plan. The proposals on the table are at the very core of what was negotiated during the two-year public formulation of the Oregon Wolf Plan. Any alterations will effectively require starting the Wolf Plan from scratch, which at this stage is in no one's best interest.

We still remain concerned, however, at the lack of effective and timely process for re-listing wolves should they drop below the population levels set for delisting.

Changing Wolf Management Region Boundaries and Establishment of Wolf Zones

We recommend no changes to either of these. The Management Region boundaries may not coincide with the federal DPS boundary, but Oregon's boundary is much more defensible from a habitat and management perspective. The feds' cutting in half of the Blue Mountains makes no sense whatsoever, so please do not perpetuate their error by adopting it.

As for the establishment of Wolf Zones, this would so clearly be a major change to the Plan that it does not warrant any extensive discussion in the context of this five-year review process.

Who Confirms Depredations?

In our opinion, there is no question that ODFW must be the lead agency on all questions of depredation, not Wildlife Services. This is the **Oregon** Wolf Plan, not a federal wolf plan, and therefore we should keep all decision-making at the state agency level whenever possible. ODFW drafted the Wolf Plan and is by far the most familiar agency with the specifics of the Plan. Wildlife Services, on the other hand, has no particular expertise with managing endangered species, and instead exist solely to kill—not manage—wildlife. We find it ironic that many who argue to keep the federal government out of Wallowa County are now advocating for giving a federal agency an enhanced role in on-the-ground wolf issues in Wallowa County. The recent events in Wallowa County have shown that Wildlife Services is simply not equipped to play the lead role in determining depredations.

We reluctantly support ODFW staff's recommendation that ODFW take the lead in Phases I and II, and Wildlife Services take the lead in Phase III. However, we would prefer that ODFW take the lead throughout the life of the Wolf Plan.

Caught-in-the-Act Language

Quite simply, this question is beyond the scope of this review process. To alter the caught-in-the-act permit process would fundamentally alter the Oregon Wolf Plan and all the negotiations behind it. The proposal to add "chasing or harassing" to the language is not supported by the Oregon Endangered Species Act, nor is it enforceable. This is yet another attempt to alter a publicly-created management plan with closed-door discussions.

Pets and Residences

What has been sought here is another gross expansion of the ability to shoot wolves. There is no evidence that wolves attacking pets or loitering near residences are problems that need addressing. They are issues based more on fear than reality. If they are addressed at all, it should be in some later full review of the Wolf Plan that involves all stakeholders.

Disease Testing

There is no evidence that wolves spreading disease is a problem that needs addressing. ODFW funds could be much better spent. Current testing of captured wolves is sufficient. We question whether the addition of the new Section D in the Wolf Plan, at pages 43-44 of the edited Wolf Plan, is necessary given that much of the disease concern over wolves is based on anti-wolf misinformation rather than fact.

Compensation

As we noted in our earlier comments, we continue to support the concept of a compensation program, and understand that such a program would likely require legislative approval.

Public vs Private Lands

The public vs private land distinction is one that we would encourage exploring in future discussions, but we agree with ODFW staff that it is a complicated discussion exceeding the scope of this review. However, if other wholesale changes are continued to be pursued by other stakeholders, we will push hard for tighter restrictions on public lands where there is already a legal mandate to manage for viable wildlife populations and activities such as livestock grazing are merely a privilege.

Adequacy of Non-lethal or Preventative Efforts

It appears that ODFW staff might have misconstrued our earlier comments on this issue. We are not requesting that all non-lethal efforts be *exhausted* prior to implementing lethal control measures. Instead, what we are requesting is some recognition that it is

inappropriate to move to lethal control when effective non-lethal measures have not been taken throughout the area wolves are frequenting. If one landowner has implemented preventative and non-lethal measures and their neighbor has not, it is inappropriate to grant either a lethal permit. While we recognize this approach places extensive pressure on an entire community to act together on implementing preventative and non-lethal measures, this is just the type of activity required to affect wolf behavior. As we all know, wolves have no regard for or knowledge of property boundaries. It serves no logical management purpose to allow the shooting of wolves prior to non-lethal measures being implemented across the entire area of wolf activity, especially in Phase I when wolves are still listed. We are also requesting the verification and documentation of non-lethal efforts *prior* to lethal permits being issued.

One partial remedy to this situation would be to clarify the new definition of "Identified Circumstance" in the OARs so that it is clear an "Identified Circumstance" may exist beyond the property boundaries of the livestock producer requesting the permit.

We appreciate the suggested change to the OARs that would require ongoing non-lethal actions during the pendency of the lethal permit under OAR 635-110-0010(5)(c)(H), but what might be more important is beefing up the requirement of non-lethal actions *before* a lethal permit is issued.

Economics

We are disappointed that the economics section of the Wolf Plan is still lacking reference to the important economic study showing that wolf-related tourism brings in \$35 million to the Yellowstone area: Duffield et al., 2008. Likewise, it still contains no reference to 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, for they far outweigh any negative economic impact experienced by the livestock industry in NE Oregon when taken as a whole (although obviously individual losses can be high).

Education

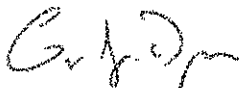
We are concerned that much of wolf education has been redacted from the proposed Wolf Plan. While there may not currently be staff and funding for educational efforts on the part of ODFW, education is still an extremely important part of wolf management. To cut it from ODFW's wolf program would be most unfortunate. It is, perhaps, an area where ODFW could leverage resource from NGOs and others to achieve at least a portion of the goals of the original Wolf Plan.

Collins 2008

We urge you to delete the reference to the Wildlife Service report, Collins 2008, on page 52 of the edited Wolf Plan (which, in fact, is a typo—we believe the report referred to is Collinge 2008). That report and its findings have been subjected to many questions as to whether it has been peer reviewed, the sources of data relied upon for the wide-sweeping and otherwise unsubstantiated conclusions, and the small sample size extrapolated into very broad conclusions. The statements and conclusions in the report are suspect, to say the least. To repeat those unfounded conclusions without a thorough literature review would be negligent.

Thank you again for this opportunity to comment on the five-year review of the Oregon Wolf Plan.

Sincerely,

A handwritten signature in black ink, appearing to read "Greg Dyson". The signature is cursive and somewhat stylized.

Greg Dyson,
Executive Director
Hells Canyon Preservation Council

September 27, 2010

To whom it concerns regarding the wolf plan:

Our family has been running cattle in the foothills of the Blue Mountains of Umatilla County for four generations. Currently we have 380 pair between Mill Creek on the north, the Walla Walla River on the south, with Forest Service land on the east.

We turn the cattle out in May and June and they graze until we gather them from October to December.

The land the cattle graze is all private land with grazing leases with different landowners.

Our concern is that we have no way to protect our cattle from wolf predators. Most of the cattle are not even seen between turning them out and gathering them again.

It would not take very many losses to put us out of the cattle business. The business with a small voice which feeds the many who ironically have a much louder voice than we.

We would like to discuss this problem with representatives of the Oregon Department of Fish and Wildlife and/or take them on a tour of the area.

Thank you for allowing us to have input in this matter.

Leland Hellberg
Hellberg Farms
940 Rainville Road
Touchet, WA 99360
509-525-7814

Christopher P Schuboth

From: Wally [captmayo@eoni.com]
Sent: Wednesday, September 01, 2010 8:57 AM
To: ODFW.Comments@state.or.us
Cc: odfw.commission@state.or.us
Subject: OWP - Hillsboro meeting

I beg the Commissioners to keep the following in mind as they ponder changes to the Oregon Wolf Plan.

- A group of private citizens, among whom I am one, is contributing significant funds toward the Range Rider Program in Wallowa County. This group, under the name North East Oregon Ecosystems, is cooperating with Defenders of Wildlife., Oregon Wild, Cascadas Wildlands, and Hells Canyon Preservation Council to insure the continuation of this valuable effort at minimizing wolf/livestock conflicts.
- The trust this cooperation is building between local livestock operators and conservationists is important and fragile. The OWP should take into account the sensitivity of conservationists to any lethal control actions that in their opinion might target wolves indiscriminately, without confirmed justification or in a way that could lead to an increase in wolf/livestock conflicts. Wolves live in an hierarchical society and removal of important pack members could encourage depredations rather than curb them. This is no news to the Commissioners of course, but I wish to emphasize how important this, and the use of non-lethal measures, is to the supporters of the Range Rider Program.
- Eco-tourism is a rapidly growing industry in Wallowa County and one of the reasons for this is the wide media coverage of our wolf population. Recently tourists groups have visited the area expressly to have the chance to learn about wolves, to see or hear wolves, or just to be in wolf country. In the past two months more than \$30,000 has been spent here by tourists, media teams and reporters, the ODFW, conservation groups, and in payments to local photographers for continuing photo coverage of wolf-related events. At least one B&B has seen a 120% increase in business over last year, and many of their guests are here partly or wholly out of interest in our wolves. At least two student groups are scheduled this month to visit the area and they are coming to learn about wolves. The Imnaha and Wenaha packs are bringing money to Wallowa County.
- One of the proposed changes to the OWP shifts the recipient of a kill permit from the landowner to the livestock operator. It is entirely possible that a landowner would not favor the killing of wolves on his land by a lessee. This change seems to me to violate some aspects of private property rights unless specific mention is made in lease agreements, and might invite litigation.

Thank you for considering my comments.

Wally Sykes

NE Oregon Ecosystems
Box 733
Joseph, OR 97846
541/432-1030

125 Copies of this letter where received.

Kip Patterson
1760 Kilkenny Dr
Lake Oswego, OR 97034-5967

CitizenLetter

An urgent message from a concerned citizen.

September 23, 2010

Commissioner Marla Rae
Oregon Dept of Fish & Wildlife
3406 Cherry Ave NE
Salem, OR 97303

Dear Commissioner Marla Rae,

I am writing to urge you to strengthen protections in the wolf-management plan and defend the few gray wolves now living in Oregon.

Gray wolves were once a regular and magical feature of our wild landscape. But they were hunted out of existence by the 1940s. After 60 years, they're slowly returning from their refuge in a corner of Idaho, and 17 wolves have established themselves in remote areas of our state.

Anti-wolf forces have been quick to pounce. The Oregon Cattlemen's Association and the Oregon Farm Bureau are both lobbying for wolf culls. Hunters advocate thinning wolf populations because wolves eat moose, elk and other large game that hunters like to kill.

Government agencies in other states have responded to similar lobbying with plans to bring down wolf populations by shooting them and, grotesquely, by gassing wolf pups in their dens.

Oregon must do better. Your department is reviewing our wolf-management plan now. I urge you to enhance protections in the plan and safeguard gray wolves from slaughter. Please tell me how you intend to address this issue.

Sincerely,

Kip Patterson

