Exhibit D

Public Correspondence received as of September 22, 2016

Previous Public Correspondence Posted on Wolf Plan Review:

Wolf Plan Review #1
Public Correspondence from 3-18-16 to 6-30-16
http://www.dfw.state.or.us/agency/commission/minutes/16/10_oct/WOLVES-PUBLIC_CORRESPONDENCE-3-18-16_TO_6-30-16.pdf

2016 Oregon Wolf Plan Review (PowerPoint) 8-5-16
http://www.dfw.state.or.us/agency/commission/minutes/16/08_august/Powerpoint_Wolf_Directors%20Report-8-5-16.pdf

Revised Schedule for Wolf Conservation and Management Plan Review & Wolf Plan Review #2 Public Correspondence 7-1-16 to 8-4-16
http://www.dfw.state.or.us/agency/commission/minutes/16/08_august/Wolf_Review_Schedule_and_Public_Correspondence_7-1-16_to_8-4-16.pdf
I would like to make a public comment concerning the Wolf Management Plan. I support maintaining and increasing the wolf population in Oregon, but I also am sympathetic to ranchers who experience depredation of livestock. However, I do not believe the ODFW should permit sport hunting and trapping of wolves, and I would like to see penalties for poaching increased. I believe only those wolves that are responsible for chronic depredation should be killed, and I think the term “chronic depredation” needs to be clearly defined so ranchers and ODFW officials know exactly which wolves need to be eliminated. Considering the sensitivity of the wolf issue, I would like to see increased monitoring of wolves in central and western Oregon as well as continued monitoring in eastern Oregon.

Thank you for considering my opinions.

Thomas Berridge
14335 Camden Lane
Lake Oswego, OR 97035
Dear Chair Finley and Commissioners:

I’m writing to encourage you to support strengthened protections for wolves through the five-year review process currently underway for Oregon’s Wolf Conservation and Management Plan. Wolf recovery in Oregon has been a tremendous success thus far, and strengthen Oregon’s plan will ensure this success continues.

Specifically, I request that revisions to the wolf plan include a continued focus on non-lethal measures to prevent wolf-livestock conflict before problems begin in the later phases of the plan. Additionally in these later phases, the plan should clearly enumerate and restrict the situations in which lethal control can be used by the Department.

As a final point, I do not support wolf hunting now or at any point in the future. This type of management is inappropriate for wolves.

Thank you for considering my comments during the five-year review process.

Sincerely,

Margery Sudsataya
991 N. Randolph street
Philadelphia, PA 19123
Oregon's wolves are expanding into California. Quite a difference exists in how the two states' Fish and Wildlife Commissions are planning. California put its few wolves on the state's endangered species list. Oregon removed protections for its approximately 100 wolves.

Oregon is following the example of its redneck neighbor to the east, Idaho. Idaho wants to wipe out the wolves in its borders. Other backward, redneck, states such as Wyoming, Montana, and Alaska, have declared war on wolves. Oregon has begun to join them.

Only California has done the admirable thing, and protected its wolves. Oregon's Fish and Wildlife Commission bowed down to the political pressure exerted by the ranchers east of the Cascades.

Philip Ratcliff
Salem, OR
From: Dylan Kettlestrings <dylankettlestrings@icloud.com>
Sent: Tuesday, August 09, 2016 3:12 PM
To: ODFW.Commission@state.or.us
Subject: Wolf Management Plan Comments

To whom it may concern:

I am pleased to hear of the recolonization of wolves in the state of Oregon. As scientists have revealed in the past century and continue to elaborate on, wolves are a key part of the ecosystem and an established wolf population is beneficial to EVERYONE. Healthy and stable wolf packs are crucial to preserving biodiversity, something that is increasingly precious and fleeting in current times.

In my opinion, it is the duty of government agencies to serve the best interests of the public. Top predators such as wolves were once regarded with contempt but studies in places such as Yellowstone National Park have unearthed the invalidity of the myths that led to their eradication. The United States is a first world country with some of the best science at our disposal. Let’s take full advantage of that by allowing wolves to thrive, returning ecosystems to normal, and providing a secure future for subsequent generations.

I understand that wolves are not welcomed by everyone and that it falls upon the government to manage these conflicts. As a tax-paying citizen, I have just as much say in the use of public lands as anyone does and I demand that these areas remain in the public trust. I demand that they are not used by those who seek to profit off of a public asset. Livestock producers have no ownership of this land and if their animals are found on this land, they should be aware of the risk of predation.

Conversely, non-lethal deterrents shall be installed around the property boarder of the livestock producers in areas where wolves may be present and these deterrents should be installed so that they may function at an optimal level. If wolf depredation occurs despite the best efforts to keep them out, then I do acknowledge the need to take lethal action.

Poaching should also be heavily penalized. The affect that poaching and sport hunting has on wolf packs destabilizes wolf society and causes fragmentation which will increase the risk of depredation.

We must fully appreciate the complex nature of the wolf. They have no desire to harm us and we should pay them the same respect.

Every concerned government agency should, according to science and the founding ideals of this country, strongly advocate for the conservation of wildlife and protection of biodiversity so that we may all enjoy the highest quality of life and leave ample resources for the generations to follow.

Sincerely,

Dylan J. Kettlestrings.
Dear Chair Finley and Commissioners:

I'm writing to encourage you to support strengthened protections for wolves through the five-year review process currently underway for Oregon's Wolf Conservation and Management Plan. Wolf recovery in Oregon has been a tremendous success thus far, and strengthen Oregon's plan will ensure this success continues.

Specifically, I request that revisions to the wolf plan include a continued focus on non-lethal measures to prevent wolf-livestock conflict before problems begin in the later phases of the plan. Additionally in these later phases, the plan should clearly enumerate and restrict the situations in which lethal control can be used by the Department.

As a final point, I do not support wolf hunting now or at any point in the future. This type of management is inappropriate for wolves.

Thank you for considering my comments during the five-year review process.

Sincerely,

Tamara McCready
6278 Cynthia st
Simi Valley, CA 93063
Dear Chair Finley and Members of the Commission,

I am writing to state my requests regarding the care of the wolves. I want to hold the commission and the department to the promises that this plan will prioritize the conservation of wolves, not their eradication. We must retain the parts of the plan that have been proven to work well for all parties. And to ensure that there is no public hunting or trapping of wolves, of any kind, in Oregon. Ever. I want wolves to run free for future generations to see in wonder in the woods. If we kill off all wolves there will be other animals that depend on what the wolves do that will suffer; the ecosystem will be out of balance. All living creatures have a part to play to make the world work in nature; including humans. Sadly we are the only species that will kill another to the point of extinction and that has a ripple effect in the nature. We need to protect them and save them for future generations to see in the wild. We've slaughtered enough animals under many phony reasons so this time let's prove we have a brain and keep them on the planet; find large parks and relocate them; then leave them alone. With collars you will know where they are and can relocate them if needs be. Don't let people chase them in helicopters so that they run them of the sanctuary and them claim they are free targets. Wolves mate for life and if there isn't enough food for their pups; they don't breed; smarter than humans. This way the numbers don't grow into large packs as their lives are hard and most pups don't survive. Couple that with the years they don't mate due to lack of food an you don't have large numbers of wolves causing problems. Let's be respectful instead of being "human" and handle this with dignity; keep track of the numbers, have a hunt when it's really needed; and only if it's really needed. If you have to hung them have a drawing like you do for deer tags and only those people can hunt. Stop the illegal hunting all together and make the punishments harsh. These majestic animals need to be seen by future generations and I for one want them to know I tried to make that happen. Thank you for your time. Heather

Heather Larsen
20250 Marsh Rd.
Bend, OR 97703
US
Dear Chair Finley and Members of the Commission,

AS I UNDERSTAND IT THE PEOPLE WANT TO KILL THE WOLVES AGAIN BECAUSE OF SOME COWS KILLED WHEREVER. WASHINGTON I THINK. HERE IS THE DEAL.. PEOPLE COME IN, AND WE TAKE THEIR LAND, AND WE MESS WITH THEIR FEEDING GROUNDS, AND THEN WE GET MAD WHEN THEY KILL OUR LIVESTOCK; SO WE START KILLING THEM SIMPLY FOR TRYING TO SURVIVE. WHY ARE WE SAVING THESE WONDERFUL ANIMALS JUST TO KILL THEM? THEY FIGHT SO HARD TO LIVE. WE NEED THE WOLVES ON PLANET EARTH. GOD PUT THEM HERE AS HE DID ALL THE ANIMALS, AND THEY ALL HAVE A PURPOSE. IT IS MANKIND'S PURPOSE TO KEEP EARTH AND ALL THE LIFE ON IT ALIVE. YOU CAN NOT PROTECT THEM HALFWAY. YOU CAN NOT EXPECT THE WOLVES TO LEAVE THE COWS ALONE WHEN THEY HAVE NO GAME FROM MANKIND COMING IN CHASING THE GAME OFF WITH THEIR POPULATION AND BUILDINGS, AND NOISE, ETC. DO THE CATTLE PEOPLE HAVE INSURANCE ON THE CATTLE? MAYBE IF YOU FED THE WOLVES UNTIL THE GAME GETS THICK ENOUGH AGAIN FOR THEM TO EAT WHAT THEY WERE MADE TO EAT THERE WOULD NOT BE A PROBLEM. YOU PEOPLE ARE SUPPOSE TO KNOW NATURE AND YOU ACT LIKE THE WOLVES ARE JUST SUPPOSE TO MAGICKALLY TAKE CARE OF THEMSELVES WHEN ALL THE PEOPLE AROUND THEM ARE BLOCKING THEM FROM BEING WOLVES.

karen e.h. naylor
515 45TH PLACE N.E.
salem, OR 97301
US
It is insanity to spend money to reintroduce wolves, let them grow to a good population level, then to turn around and have them killed. A healthy wolf population is necessary for a healthy elk population and the proper balance if predator/prey. Thank you, Stacey R. Dean, MD

-----Original Message-----
From: ODFW Commission <odfw.commission@state.or.us>
To: Stacey Dean <cordeans@aol.com>
Sent: Mon, Aug 15, 2016 2:15 pm
Subject: Thank you for your comments

Thank you for your comments on this issue. Your message will be forwarded to the Oregon Fish and Wildlife Commissioners for review and any necessary response.
Dear OFW Commissioners,

I am writing to encourage you to enact stronger protection of wolves as Oregon develops an updated Wolf Conservation Plan.

I urge you to aim for provicing conditions that will allow for sustainable wolf recovery and not be satisfied with simply maintaining minimum population levels.

Specifically, I can identify 2 changes I believe are imperative to make in the plan:

1) Carry forward Phase I requirements for non-lethal efforts to Phases II and III.
2) Define "chronic depredation" as 4 qualifying incidences over 6 months in Phases II and III.

As a native of Illinois who has relocated to Oregon, I can tell you that wildlife such as wolves are one of the greatest treasures this corner of the country has to offer. The presence of such majestic creatures is not enjoyed everywhere. This makes it even more important that you take the responsibility of protecting them seriously. The ecological, economic, cultural and educational value these creatures can provide are invaluable.

Sincerely,
Zoe Grant
Dear Chair Finley:

In keeping with ODFW's mission "to protect and enhance Oregon's fish and wildlife and their habitats for use and enjoyment by present and future generations," I encourage the Commission to provide full protection to Oregon wolves. The current wolf population is far below the population that could be sustained in Oregon. Wolves pose essentially no threat to humans and only a small threat to livestock, which are far more likely to die prematurely from weather events and poor animal husbandry. Please allow sound, biological science to guide decisions at ODFW, not unwarranted fear or attitudes.

Sincerely,

Steven Soltesz
Dear Chair Finley and ODFW Commissioners;

I am writing to you to in regards to the Wolf Plan Revision. I urge you to strengthen – or at the very least not weaken – protection for the wolves.

Please put a priority on non-lethal methods to deal with any problems between the livestock industry & wolves. Training and encouraging livestock industry families to use methods that decrease the odds of wolves being attracted to their stock are very important. States, such as Oregon, that have focused on such methods have experienced a ratio-oriented decrease in livestock killings by wolves as the wolf population grows. I would hope this could be used as one of the foundations on which your decisions are made.

Wildlife is a scarce way of life that is becoming more and more rare in our dollar driven society. Please protect the wildlife that continues to exist ... and promote its health and recovery. Any Plan Revision that makes the killing of wolves easier based on a limited population (in the range of 100) is not true science.

I encourage you to let science be your driving force.

Sincerely,

John Herberg
541-221-2610
677 1/2 West 23rd Ave
Eugene, OR 97405
If you can answer one question for me. If the killings happened on what's considered public grazing land why are the wolves at fault

On Aug 20, 2016 6:36 PM, "ODFW Commission" <odfw.commission@state.or.us> wrote:

Thank you for your comments on this issue. Your message will be forwarded to the Oregon Fish and Wildlife Commissioners for review and any necessary response.
Chair Finley and OFW Commissioners

Aldo Leopoldo famously took up the cause of conservation after killing a wolf in the Gila Wilderness. He was a young man at the time but he had a wise and sensitive disposition, what you might call a 'soul'. He knew that wilderness, too, has a soul and he had just killed part of it.

I believe humans and wolves can co-exist. I urge you to provide for a sustainable wolf recovery so that an important part of our western heritage will continue to awe and inspire future generations of Americans.

Thank you for the work you do.
Sincerely, Randall Sinnott
Eugene, Or
Dear Chair Finley and members:

Thank you for providing a period for public comment. I know this is a divisive and contentious issue, and I'm aware that your job isn't an easy one!

Last fall, at the final delisting hearing in Salem, we were all told that delisting wouldn't matter, because wolves would still be protected under the state's wolf plan. At that time, I believe the Commission was asked to delay the delisting decision until after the plan had had its five-year review. That request made good sense; I believe it would have made it more difficult to undermine the plan.

Delisting went forward, as we know. We also have some pretty strong evidence, with the removal of the four Immaha Pack wolves in March, that the plan works. The order came within days of confirmed wolf kills. None of us were happy about that, but I think we all understood that there was no other choice; those particular wolves weren't going to stop their depredations.

But now I hear the livestock industry claiming that "they've done their part", so somehow we have to do ours, which apparently means gutting the plan?

I'm seeing proposals that alarm me, especially the proposal to allow hunting of wolves in Oregon. We've seen the wholesale killings in Idaho, and I don't believe that has any place in Oregon, where we only have a few over 100 wolves.

Personally, I'd like to see the wording of the plan strengthened and clarified, to avoid any ambiguities. I'd like to see the requirements for non-lethal controls strengthened, and more oversight, to guarantee that livestock producers are indeed complying with the rules before a kill order is issued.

Wolves are a vital and wonderful part of Oregon's wilderness, and I think most of us here want to see them protected.

Thank you for your time.

Ellen M. Marmon
Dear Chair Finley and OFW Commissioners:

We are writing to comment on the current Wolf Plan Revision.

We were greatly dismayed that wolves lost their protections last year in spite of scientific comments and significant public opposition to delisting. We hope we do not see the same scenario play out with the wolf plan revisions, and we ask you to consider our input carefully at this stage of the process.

We strongly support measures that prioritize the conservation of wolves in Oregon, using conflict prevention techniques, not lethal control measures and, therefore, support carrying forward Phase 1 requirements for non-lethal efforts to Phases II and III. No revisions to the Plan should weaken protections for wolves or make it easier to kill wolves.

Specifically, the revised Plan should preserve those parts that have proved beneficial for all parties. Primary among these: requirements for steps that must be taken before lethal removal of wolves for chronic livestock depredations. Provisions in Phase I give clarity, transparency, accountability and enforceability of the steps that must be taken by the department and ranchers before lethal removal of wolves for conflicts with livestock can be considered. This includes qualifying depredations of four events within six months, sanitation and conflict prevention measures put in place before conflicts occur, and public notification requirements. These measures work: despite a growing wolf population, conflicts with livestock have stayed level or decreased, and no wolves were killed. That’s an undeniable win-win. Since these Phase I provisions worked so well, don’t ignore or discard them. Instead, they should be added to Phase II and Phase III management of wolves.

Also, we are very concerned about the possibility of trophy hunting in Oregon, even on a small scale. Trophy hunting, because it takes the most powerful members of a pack, will very likely INCREASE depredation on livestock because of the disruption to the family structure of the wolf pack. Published science supports this view. Inexperienced and young wolves are more likely to take “easy” prey such as calves, rather than taking their “normal” prey, the weakest members of an ungulate herd, and thereby increasing the health of the herd. We are totally opposed to hunting or trapping of wolves by the general public under any circumstances.

Thank you for carefully considering and incorporating our comments.

Sincerely,

Ernie and Marietta O’Byrne
Northwest Garden Nursery
86813 Central Rd
Eugene OR 97402-9284
541-935-3915
www.nwgnursery.com
From: Michelle Mintmier <mmintmier@yahoo.com>
Sent: Friday, August 26, 2016 8:07 AM
To: odfw.commission@state.or.us
Subject: Wolf Plan

Dear Chair Finley and OFW Commissioners,

I care about the integrity of Oregon’s nationwide leadership on animal and wildlife issues. We should set ourselves apart from some other western states as a place where wolves and other top predators are considered with the highest priority.

This is what makes us such a great place to call home and a place for other Americans to visit and appreciate all the wild we have to offer in terms of tourism.

Please consider the following ideals as you proceed:
--focus on conflict prevention, not killing
--provide for sustainable recovery, not minimum population levels
--carry forward Phase 1 requirements for non-lethal efforts in Phases 2 and 3
--in Phases 2 and 3, define ‘chronic depredation’ as 4 qualifying incidences in 6 months.

Thank you in advance for you consideration, it is greatly appreciated
Michelle Mintmier
Beaverton, OR
Dear Chair Finley and ODFW Commissioners:

I am a high school student in Eugene, and I believe that we should have strong protections for Oregon’s wolves, and should focus on conservation and conflict prevention, for the following reasons.

One reason is that wolves enrich people’s experiences of being in the wild, whether or not they even see a wolf. People will have a positive outdoor experience by looking and listening for wolves while keeping in mind that wolves do not pose anything near a serious threat to humans. (One or two people have been killed by wolves in North America in more than 100 years). Other large mammals in Oregon, such as black bears, are very hard to find. I hike in Oregon a lot, but I have only seen one black bear in the state during my lifetime, and not while hiking. Hopefully the law will allow Oregon to have enough wolves that I might see one someday.

This brings me to a second reason for protecting wolves. People who share my hope of seeing a wolf will bring economic benefits to the state in terms of tourism and recreation because they will hike more in more parts of the state. They will be more likely to visit large areas in eastern Oregon and spend time and money in cities and communities that have struggled economically.

A third reason to protect wolves is that we can greatly limit their conflict with livestock. Non-lethal methods of protecting livestock are working because the number of livestock killed by wolves is not keeping up with wolf population growth. The state and ranchers can continue to work together to effectively protect livestock without killing wolves. Wolf predation on livestock that does occur has a small economic effect on the ranching industry, and the state has a compensation program for livestock losses.

A final reason is that wolves are a native species, which means that the ecosystem in Oregon can sustain them as it did before Oregon’s wolves were wiped out in the 1940s. Deer and elk populations are large enough not to be threatened by wolves, and wolves can indirectly repair landscapes long ago thrown out of balance by an overabundance of herbivores. This has been clearly demonstrated in Yellowstone National Park, where wolves have helped critical riparian vegetation to grow back. In addition, the fact that wolves are native to Oregon also means that it is good ethics to allow them to recover, because humans were responsible for wiping them out.

I look forward to the new management plan, and I hope you consider all the important reasons to maintain strong protections for wolves in Oregon. Thank you.

Sincerely,

Josh Sayre
To the Office of the Oregon Department of Fish and Wildlife:

I know how hard all of you work, and I know yours is a job that draws criticism no matter what decisions you make. So, before saying anything else, I want you to know that I appreciate how hard you work.

I am writing specifically because of the wholesale slaughter of the wolf pack in Imnaha. The behavior of the rancher there reads like a throwback to 125 years ago, before modern science gave us insight into how bio-communities work. I am sorry that the rancher who, apparently, did the shooting is not fully-educated, although I believe that part of the responsibility of any businessman, including ranchers, is to educate himself about current practices.

Please do what you can to ensure that this is the last time we ever hear of such activity again in our great state.

--

Hal Wing
World Religions. Forensics, and Philosophy
St. Mary's School
hwing@smschool.us
www.smschool.us
Give today to St. Mary's School

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On behalf of me and my family: We desperately want a strong Wolf Plan—more durable than past measures. We consider the killing of any our truly small number of resident wolves to be a measure of last resort as judged by wildlife biologists and ecologists, not the hunters, poachers, and cattle-to-cheap-hamburger industry. We are disgusted by the spectre of wolves gunned down by helicopter, leaving orphaned young to become nuisance animals who will suffer the same fate due to improper training and socialization.

Oregon was considered the model for wolf recovery success and everyone cheered for OR7’s journey and ultimate return to home with a mate. Let’s hold out for clarity, transparency, and enforceable standards in managing our wolf population: This is no time to cave to the forces of blood sport, the meat industry, and government opacity.

Sincerely,
Zucker family
1966 Orchard St.
Eugene, OR 97403
I strongly support state services and the need for an ODFW. That said, I am disappointed in the agency's position on wolves and on our Governor's position as well.

The State has not made its case for the continuing harassment and killing of the wolves. I get that rancher's property is involved, but the potential loss of livestock should be taken as an anticipated cost of doing business. We do not ask the state to protect the brewery industry because a beer truck driver may have an accident, and we do not underwrite grocery stores when items on the shelves hit their due dates. Our capitalist system anticipates a free market with a fair amount of risk involved; why should ranchers be exempted from this?

I would also argue that the product produced by ranchers in the quantities they produce is not healthy for people and for our environment. Mass cattle and sheep raising causes a great deal of pollution and our emphasis on eating meat continues to cause human health problems. We're subsidizing an industry which hurts us,

The meat industry is increasingly driven by multinationals. We are no longer talking about family farms competing in local markets. Why are we subsidizing multinationals? And why are the wolves paying for human error?

Full disclosure: I eat meat and am strongly pro-farmer. I also love the west.

Killing wolves cannot be done humanely. We are interfering in nature in order to protect multinationals, animals suffer as a result and we are lessened as human beings and as stewards of the earth as we do th's.

I get that political expediency is involved. We can't get guns out of the hands of crazies, we defend multinationals as they extort our region, we allow lead in the water until it is too late, we allow places like Tillamook to be transformed by the dairy industry and coastal waters are not always safe now—all because certain industries and politically-positioned groups and individuals have more power than ordinary people like me. My hope is that the ordinary people who love our west and want to live in balance with our environment here can influence ODFW and our Governor to do the right thing—leave the wolves alone and focus on protecting and rehabing our environment.

Thanks!

Bob Rossi
PO Box 2766
Salem, OR.
97308
rjrossi55@gmail.com
September 7, 2016

Oregon Department of Fish and Wildlife Commission
4034 Fairview Industrial Drive
Salem, Oregon 97302

Chair Finley,
Director Melcher
Members of the Oregon Department of Fish and Wildlife Commission:

Subject: Oregon Wolf Conservation and Management Plan five year review.

Wallowa County offers this input to The Oregon Wolf Conservation and Management Plan five year review:

Wallowa County is the where the largest portion of the wolf population lives. Wallowa County’s residents have been living with the wolves since at least 2009. Wallowa County is where the largest amount of depredations has occurred. It is one of only two counties that have experienced enough concentrated loss for ODFW to move to lethal take of wolves.

The impact of wolves to the community in general and the impact to the livestock producers in particular has been a very serious problem now for over six years. These impacts to the community include having to be watchful of domestic pets when out in the open and bow hunters having to carry a pistol or just quit hunting because wolves instead of elk come to their calls. The impacts to livestock producers include loss of livestock; injuries to livestock, aborted calves, stress caused weight loss and sickness in animals and the inability to use dogs when gathering

Wallowa County’s following requested changes pertain only to Phase II and III of the Oregon Wolf Conservation and Management Plan.

A third party should investigate livestock injury or death thought to be caused by wolves:
The process of confirming a depredation has been frustrating and
confusing from the beginning. Where Oregon Department of fish and wildlife manages the wolves; a third party should be investigating the depredations and making the call on whether it is a wolf kill or injury. The use of a qualified person already in the area should be the process. The USDA Wildlife Services has agents in most of the counties experiencing wolf depredations. They, Wildlife Services, should be the identified entity to investigate and make depredation calls. During the writing of the plan, and the last review, ODFW indicated that Wildlife Services would be the acting agent for these investigations and possible removal of wolves. If a Wildlife Services agent is not available the County Sherriff or the Oregon State Police should be the backup entities to make these calls. In the proposed ODFW budget there is a recommendation for four new staff strictly identified for wolf management on the East side of Oregon. If the above mentioned agencies were utilized for investigations and removal, the need for additional ODFW staff would be reduced.

Wallowa County believes that the rules for moving to lethal take should be changed:
The lethal take allowance should be for two probable depredation events to equal one confirmed depredation event. Two confirmed depredation events should require ODFW to move to lethal control. Also if a pattern of confirmed harassment is occurring, these events should also be considered as probable or confirmed events, counting toward lethal control. These events include chasing of livestock causing calving difficulty, abortions, running cattle through fences, etc.

Appeals:
The appeal process is currently the most autocratic process we have ever seen. Appeals of decisions made by the field staff and approved by the ODFW District staff should not have an appeal back to the District staff. This must be changed to offer a real appeal and to show the public that ODFW is serious about having an appropriate process that is transparent and allows for some level of confidence in receiving a quality decision. We request that an independent review of a depredation determination, that is appealed, go to a third party board consisting of a representative of the local sheriff, representative of the local District Attorney and a member of the Oregon State Police.

Collaring:
In Phase III Wallowa County requests that all packs that are likely to have conflict with livestock continue to be collared regardless of how many packs this becomes. At a minimum 50% of all packs in the state
should be collared. The importance of collaring includes monitoring populations; also as you look at non-lethal actions, they are mostly ineffective without collared wolves.

ODFW should share wolf location information with affected producers to help provide for better management around the presence of wolves. For non-lethal effectiveness the actual information as to the location would be far more useful than polygons.

Establish Wolf Management Areas and Population Objectives:
Wallowa County supports creating wolf management areas or zones with set population objectives within each zone. This will allow areas that have been dealing with the presence of wolves to control the high level of wolves without waiting for the rest of the state to have the same population. Producers in Wallowa County have worked diligently to follow the Oregon Wolf Management Plan with the understanding that as the population of wolves in Oregon increases they would be able to have some regulatory relief from the harassment and losses they have lived with for the past six years.

Controlled Hunts:
As Phase III begins and wolves exceed population objectives in a management unit, we recommend the use of controlled hunts. These hunts can be localized to meet needs of an area of depredation, harassment of livestock or wildlife, wolves in proximity of dwellings, farm and ranch operations or communities. This allows hunting in specific pack areas with a priority toward livestock depredation or areas with documented declines in game populations.

Wolf management in general needs to be accomplished locally without onerous and time-consuming oversite from regional or state level offices. Wolf management decisions, including lethal take, should be left to the local offices. This would increase the timeliness and effectiveness of these actions and would reduce the burden and cost of wolf management for ODFW, especially the district offices.

We encourage the Commission to accept Wallowa County’s recommendations when revising the Wolf Conservation and Management Plan. We have observed the wolf behaviors and their impacts and the frustrations producers have with the lack of sound and consistent management tools.
Sincerely,

Susan Roberts, Chair, WC Commission

Paul Castilleja, WC Commission

John Lawrence, WC Commission

Bruce Dunn, Chair of the WC NRAC

Rod Childers, Vice Chair of the WC NRAC

John Williams, OSU Extension
I request that my comments be included in the public record.

I want the Oregon Wolf Plan strengthened because:

. Wolves play an important role in a healthy ecosystem.

. The mission of the Oregon Department of Fish and Wildlife is: "... to protect and enhance Oregon's fish and wildlife and their habitats for use and enjoyment by present and future generations." The current plan, in my opinion, does not accomplish this mission.

. Viable wolf populations would add economic value to the state. According to an article by Jeff Delkin in the Oregon Business magazine on August 31, 2016:

  "The long-term health of most businesses relies on a well-preserved environment. For example, outdoor recreation provides approximately $646 billion in annual revenues for the United States and employs 6.1 million people directly. That's a powerful argument for conserving wildlife habitat and protecting all species, endangered or not. Wildlife viewing in particular generates the following: $33 billion in consumer spending on gear and trip-related costs, $2 billion in business (serving wildlife watchers), and $6 billion in economic ripple effects annually. Protecting the gray wolf has clear positive economic benefits. The gray wolf's reintroduction to Yellowstone National Park in 1995 boosted revenues in local communities by $10 million annually. Furthermore, a study by University of Montana economists revealed that more than 150,000 people visited Yellowstone specifically because of wolves, people who account for an estimated $35 million in revenue for the Greater Yellowstone area."

Why isn't Oregon "cashing in" on this economic success?

. The Oregon Wolf Plan was very successful in starting to restore a viable wolf population between 2012 and 2015. Delisting the wolf in part of its historic range in Oregon has led to increased wolf human conflict and wolf killing.
We need to continue to emphasize conservation and conflict prevention. Killing wolves is unacceptable and it should be an option of last resort. Ranchers must show they are following a prescribed plan of action to prevent conflicts. Public lands should be off limits to wolf killing. Ranchers are given the privilege of grazing their cattle on public lands. Citizens have the right to expect that wildlife have priority over cattle.

The plan needs to continue the provisions for transparency, clarity and enforceability. These important aspects of Oregon’s Wolf Plan have expired.

Sincerely,

Delores Porch

2677 NW Ginseng Pl

Corvallis OR 97330
It is my hope that your agency will have a good solid plan to conserve and protect wolf populations, instead of killing them to near extinction and then trying to bring them back over and over again. Phase 1 non-lethal means first, before phases 2 and 3. In phases 2 and 3 make clear depredation examples of at least 4 incidences in 6 months. Not everyone wants wolves dead. They are a part of wildlife and a part of the eco-system. We want them protected. Many farmers and ranchers have made progress in using non-lethal means first. Please continue these efforts of protecting our wildlife first. Thank you,

Shannah Praus
Roxann B Borisch

From: Benton Elliott <benton.elliott@gmail.com>
Sent: Friday, September 09, 2016 9:39 AM
To: odfw.commission@state.or.us
Subject: Wolf Plan Comment

Study Debunks Theory That Killing Predators Reduces Livestock Losses

SILVER CITY, N.M.—Killing predators such as wolves, mountain lions and bears in order to protect livestock may have intuitive appeal, but a rigorous review of multiple studies that was published today shows little or no scientific support that it actually reduces livestock losses. In fact, in some cases it even leads to increases in livestock loss. These conclusions directly counter the reasoning behind the common practice of killing predators in response to livestock depredations — as carried out by the secretive federal program, Wildlife Services, and many state game agencies.

"This study shows that not only is Wildlife Services' annual killing of tens of thousands of wolves, coyotes, bears, bobcats, cougars and other animals unconscionable — it's also ineffective," said Michael Robinson of the Center for Biological Diversity. "Our government should ground the aerial snipers, pull the poisons and remove the steel leghold traps in response to these findings."

The unexpected finding that carnivore killings can increase depredations is likely based on disruption of the predators' social dynamics — namely, by removing dominant animals that maintain large territories, these killings release sub-adult animals that are less-skilled hunters and thus more likely to target domestic animals.

The new review, "Predator Control Should Not Be a Shot in the Dark" — published in one of the world's top scientific journals, Frontiers of Ecology and the Environment — evaluated the methods in 24 previous studies of responses to predation on livestock and catalogued them according to their adherence to the scientific method.

The review found few studies that met accepted standards for scientific evidence. Half of the evaluated studies — conducted in North America and Europe — did not follow an experimental design that included control (non-manipulated) herds of livestock and other standard scientific safeguards to exclude the effects of bias in sampling, treatment, measurement or reporting. However, the review found 12 studies that were conducted according to the scientific method. Most of the tests of lethal methods showed no effect or unexpected increases in livestock deaths. Non-lethal methods were found to be safer and more effective.

Two of the studies that used sound methods found that non-lethal measures, specifically guard dogs and fladry (ribbons attached to fences to scare predators away from lambing pastures), were effective at deterring livestock depredations.

The study was conducted by Adrian Treves of the University of Wisconsin, Miha Kropel of the University of Ljubljana in Slovenia, and Jeanine McManus of the University of Witwatersrand in South Africa.

The Center for Biological Diversity is a national, nonprofit conservation organization with more than 1.1 million members and online activists dedicated to the protection of endangered species and wild places.
Roxann B Borisch

From:  Charlotte Behm <behmc@lanecc.edu>
Sent:  Friday, September 09, 2016 12:46 PM
To:    odfw.commission@state.or.us
Subject:  Wolf management

Dear Chair Finley and OFW Commissioners:

I am very interested in providing for a sustainable wolf recovery, not the population level kept at a minimum. Please be reasonable about the wolves and focus on conservation and conflict prevention in ALL phases of your plan. If cattlemen are so concerned about their cattle, please also ask about coyotes, and how to improve their own animal husbandry practices instead of crying wolf at every incidence.

Charlotte Behm
731 Poltava St
Springfield Oregon 97477
Dear Commissioners,

I support the return of wolves to Oregon and their continued recovery. I oppose wolf hunting.

From 2012 to 2015 under a legal settlement, Oregon focused on transparent, defensible, and enforceable standards to prevent conflict and ensure wolf recovery. During that time the wolf population increased and conflict decreased.

Since 2015, poaching, livestock losses, litigation, wolf killing, and other conflicts have increased.

Some interests see killing wolves as the solution to problems and are calling for a weak wolf plan that makes killing wolves easier. Oregon should learn from its own past and from other states. Killing wolves does not resolve conflict. Killing wolves should truly be an option of last resort.

I urge you to honor your mission and strengthen Oregon’s Wolf Conservation and Management Plan. Carry forward the parts of the Wolf Plan that worked to reduce conflict and recover wolves. Especially focus on transparency, clear defensible definitions, and enforceable standards to prevent conflict. Fix those parts of the plan that fell short.

I also urge you to reject the hunting of wolves.

Thank you for considering my comments. Let’s double down on success, move past recent conflict, and keep recovery on track!

Sincerely,

Denise Lytle
11 Wisteria Dr.
Apt. 3F
Fords, NJ 08863
Dear Commissioners,

***Oregon's wolf population currently remains a token, vulnerable to the retaliation of ranchers and others with an allergy to cohabitation upon the land which the Wolves had inhabited since time immemorial. ODFW has given more than enough time and forbearance to ranching interests, and must commence the work of restoring a true population.

The Gray Wolves have a right to exist in the lands they have inhabited for eons before human memory. The ranchers who enjoy the extraordinary privilege of running their livestock over Oregon's landscape are recent visitors. These precious and iconic fellow mammal enjoy a prior and superior right to their ancestral home. The ranchers are obligated to conform their habits and demands to the survival imperatives of the wolves, and have no right to invoke government firepower and harassment of these wolves, nor government sanction for wolf "hunting," for their parochial financial interests.***

I support the return of wolves to Oregon and their continued recovery. I oppose wolf hunting.

From 2012 to 2015 under a legal settlement, Oregon focused on transparent, defensible, and enforceable standards to prevent conflict and ensure wolf recovery. During that time the wolf population increased and conflict decreased.

Since 2015, poaching, livestock losses, litigation, wolf killing, and other conflicts have increased.

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I also urge you to reject the hunting of wolves.

Thank you for considering my comments. Let's double down on success, move past recent conflict, and keep recovery on track!

Sincerely,

Jim Steitz
564 Esslinger Drive
Gatlinburg, OR 97520
From: Peter Smith [mailto:mrrails@yahoo.ca]
Sent: Monday, September 12, 2016 8:22 PM
To: odfw.commission@state.or.us
Cc: dan_ashe@fws.gov
Subject: REWILDING FOR URBAN WILDLIFE/NEED TO REFRAIN FROM DEGRADING ECO SYSTEMS/CLIMATE CHARGE/VIDEO ON HOW WOLVES CHANGE RIVERS

ODFW COMMISSIONERS

There is a dire need to refrain from interfering in "eco systems" and you will find this a good video commentary to the effect that could even be a Public Service Message!!

Re: Rewilding Urban Wild Life
Re: TARGET WOLVES/ENVIRONMENTAL DEGRADATION
Re: RAW VS CUT LOGGING
Re: ANIMAL PROOFING RANCHES SO THEY PURSUE WILD LIFE NOT FARMERS COWS

You would think they had the mind of a six year old and is's not conservation or agriculture it's environmental degradation that's eroding our eco systems!

How Wolves Change Rivers

| linkis.com | If you likes How Wolves Change Rivers, check out How Whales Change Climate: www.youtube.com/watch?v=M18HxXyc3CM For more from George Monbiot, visit www.monbiot.com/ and for more on "rewilding" visi... |

Today's headline Profanity Peak wolf pack in state's gun sights after rancher turns out cattle on den

cc: Tom Vilsack
CC: Dan Ashe c/o FWS
cc: Catherine Mckenna
c: Justine Trudeau
c: Hope for Wild Life
c: John Holden
c: Dan Ash c/o FWS
c: Michael Audain c/o Grizzly Bear Foundation
c: Dan Ash c/o FWS

Mr. Peter Smith Chief Executive Officer
CAVE MAN ENVIRONMENTAL CONSULTING
Bringing rational decision making back to Government
E Mail: mrrails@yahoo.ca
cave.man391@gmail.com
From: Mendi Menefee <losimation@hotmail.com>
Sent: Tuesday, September 13, 2016 10:55 AM
To: odfw.commission@state.or.us
Subject: Pro-Wolf Plan

Dear Commissioners,
We in Oregon have the chance to not make the same mistake in wildlife management that our neighboring states have made and are making. We can make a strong new wolf plan that uses science, education, and respect for our state's amazing wildlife, including wolves, to guide us, instead of allowing fear, ignorance, and greed to convince us to kill first and think later.

I am not just a lonely, rancher-hating Oregonian. The vast majority of people in this state are pleased that native wildlife, including predators, can flourish in our Oregon wild lands. We want to support our iconic wolves. We are disgusted and angry when our wildlife is slaughtered for business purposes, or for the convenience of a few. We want a strong new wolf management plan that does not resort to killing unless absolutely necessary, and as a last resort. We want a plan that helps educate people who may be on wolf territory, and supports them with non-lethal deterrence methods.

Thanks you.

Mendi Menefee
6824 N Maryland Ave
Portland, OR 97217
Commissioners,

I support the return of wolves to Oregon and their continued recovery and oppose wolf hunts.

From 2012 to 2015 under a legal settlement, Oregon focused on transparent, defensible, and enforceable standards to prevent conflict and ensure wolf recovery. During that time the wolf population increased and conflict decreased.

Since 2015, poaching, livestock losses, litigation, wolf killing, and other conflicts have increased.

Some interests see killing wolves as the solution to problems and are calling for a weak wolf plan that makes killing wolves easier. Oregon should learn from its past and from other states. Killing wolves does not resolve conflict. Killing wolves must only be an option of last resort.

Honor your mission and strengthen Oregon’s Wolf Conservation and Management Plan. Carry forward the parts of the Wolf Plan that worked to reduce conflict and recover wolves. Focus on transparency, clear defensible definitions, and enforceable standards to prevent conflict. Fix those parts of the plan that fell short.

I also urge you to reject the hunting of wolves and keep recovery on track.

Sincerely,

Jennifer Nitz
802 Front
Missoula, MT 59802
Dear Chair Finley and Commissioners:

Though not an Oregon native, I have lived in this great state for 33 years. What drew me in the beginning and continues to sustain me is the richness of the state’s biodiversity – diversity of habitat and wildlife. That’s not to say that we humans haven’t left our mark, much of it destructive.

The return of wolves to Oregon is a tremendous success story so far and the state can serve as a model for others, if we do this well. Livestock grazing, particularly on public lands, is not the highest and best use of habitat. I feel strongly, though off topic here, that predator control should NEVER be undertaken on public land and it should be heavily restricted everywhere.

Thus, I encourage you to enact strengthened protections for wolves during this review process. I understand that some wolf-livestock conflict will arise, and that livestock losses can be a financial burden for ranchers. However, ranchers get a lot of handouts in other ways – and wolves should have the right to continued existence and growing population, in order to return a balance to nature. An ecosystem is badly weakened in the absence of apex predators.

Specifically, I request that the wolf plan maintain a strengthened focus on non-lethal measures to prevent wolf-livestock conflict and that the plan clearly enumerate and restrict the situations in which lethal control can be used by the Department. And that wolf hunting NOT be, now or in the future, a part of any management plan or for sport hunting. Let us show the world that Oregon can demonstrate enlightened self-interest and that we value our wildlife and wild places above personal interest.

Thank you for considering my comments during the five-year review process.

Sincerely,

Louise Shimmel
ODFW,

Top end predators are an integral component, key component, of a healthy ecosystem.

Please do not fold to cattle interests on the East Side or to short sighted hunters that demand more deer and elk to shoot.

Please remember the majority of Oregonians that support having healthy wolf populations in our mountains.

ODFW has done a good job in past years with wolves. And I am okay with sport hunting, by limited tags only, of wolves once they become strongly established in various districts.

But ranchers that graze public lands should not be allowed to force death on wolves just so their cows can utilized our lands 100%. Wolves and other predators must be allowed habitat to survive.

Do not revise the Wolf Management Plan under pressure from ranchers [the minority of Oregonians.] Please stick with the intelligent, well discussed, well written plan from back in 2012-15.

Indeed open range grazing means cows get killed by vehicles to, I expect, a greater degree than by wolves. I expect many are left dead or injured by whomever hit them. Ban the truck/car? Nope. Ban, kill off the wolves. Ncpe.

Wolves are needed and most Oregonians want them in our state.

Thanks.

Dave Potter
3930 Rio Vista Way
Klamath Falls, OR 97603
Dear Commissioners,

I support the return of wolves to Oregon and their continued recovery. I oppose wolf hunting.

I urge you to honor your mission and strengthen Oregon's Wolf Conservation and Management Plan. Carry forward the parts of the Wolf Plan that worked to reduce conflict and recover wolves. Especially focus on transparency, clear defensible definitions, and enforceable standards to prevent conflict. Fix those parts of the plan that fell short.

I also urge you to reject the hunting of wolves.

Thank you for considering my comments.

Sincerely,

james thompson
2743 nw thurman street
suite 7
portland, OR 97210
Attached is Wallowa County Stockgrowers' recommendations for the Five Year Wolf Plan review.

Thanks,
Scott Shear
Oregon Department of Fish and Wildlife Commission
4034 Fairview Industrial Drive
Salem, Oregon 97302

Subject: Oregon Wolf Conservation and Management Plan: Five Year Review

Chair Michael Finley,
Director Curt Melcher
Members of the Oregon Department of Fish and Wildlife Commission:

The Wallowa County Stockgrowers offers the following input and recommendations to The Oregon Wolf Conservation and Management Plan Five Year Review.

Wallowa County may be located in the northeast corner of Oregon but it resides at the center of the largest wolf population in the state. Ranchers and residents of this area have been living, working and recreating amongst wolves since 2009. Wallowa County is where the largest amount of depredations in the State have occurred and it is one of two counties that have experienced enough concentrated and documented livestock death and depredation for ODFW to move to lethal take of wolves.

The impact of wolves to the community and the impact to the livestock producers in particular has been a very serious problem now for over six years. These impacts to the community include having to be watchful of domestic pets and animals, as well as hikers, hunters and recreationalist having to employ constant elevated levels of awareness to ensure basic personal safety. The physical impacts to livestock producers include death loss of livestock, injuries to livestock, aborted calves, stress caused weight loss and sickness in
Oregon Department of Fish and Wildlife Commission
4034 Fairview Industrial Drive
Salem, Oregon 97302

Subject: Oregon Wolf Conservation and Management Plan: Five Year Review

Chair Finley,
Director Melcher
Members of the Oregon Department of Fish and Wildlife Commission:

The Wallowa County Stockgrowers offers the following input and recommendations to The Oregon Wolf Conservation and Management Plan Five Year Review.

Wallowa County may be located in the northeast corner of Oregon but it resides at the center of the largest wolf population in the state. Ranchers and residents of this area have been living, working and recreating amongst wolves since 2009. Wallowa County is where the largest amount of depredations in the State have occurred and it is one of two counties that have experienced enough concentrated and documented livestock death and depredation for ODFW to move to lethal take of wolves.

The impact of wolves to the community and the impact to the livestock producers in particular has been a very serious problem now for over six years. These impacts to the community include having to be watchful of domestic pets and animals, as well as hikers, hunters and recreationalist having to employ constant elevated levels of awareness to ensure basic personal safety. The physical impacts to livestock producers include death loss of livestock, injuries to livestock, aborted calves, stress caused weight loss and sickness in
animals and the inability to use dogs when gathering. Additionally, and in direct correlation to the physical impacts, there are emotional and financial impacts to livestock producers as well. Heightened awareness, implementation of deterrents and unending diligence take time and valuable resources. The stress incurred is immeasurable.

Wallowa County Stockgrowers is requesting the following changes which pertain only to Phase III of the Oregon Wolf Conservation and Management Plan.

I. Initial investigation:
Wallowa County Stockgrowers believe it to be a conflict of interest for the managing agency to make determinations at the livestock depredation investigation sites. Wildlife Services should be the identified entity to investigate and make depredation determination. The USDA Wildlife Services has agents in most of the counties experiencing wolf depredations. During the writing of the plan, and the last review, ODFW indicated that Wildlife Services would be the acting agent for these investigations and possible removal of wolves. If a Wildlife Services agent is not available the County Sheriff or the Oregon State Police should be the backup entities to make these determinations.

II. Appeals: The appeals process shall be initiated by the livestock producer:
Appeals of decisions made by the approved entity should be changed from the ODFW district field staff to an independent reviewer. We request that an independent review of each depredation determination go to a third party board consisting of a representative of the local sheriff, representative of the local District Attorney and a member of the Oregon State Police. The final decision shall be made by simple majority.

III. Rules for lethal take:
The lethal take allowance should be defined as two probable depredation events equal one confirmed depredation event. Two confirmed depredation events should require ODFW to move to lethal control. An attack constitutes an event. If the event involves the depredation of more than one animal, and an economic loss is realized and verified, this will constitute two confirmed depredation events. If a pattern of confirmed harassment has occurred, these events should also be considered as confirmed events, counting toward lethal control. These events include chasing, biting, causing dystocia, abortions and killing of livestock.

IV. Collaring:
We request that all packs likely to have conflict with livestock continue to be collared. At a minimum 50% of all packs in the state should be collared. The
importance of collaring includes monitoring populations, collection of scientific data, and enhancing the effectiveness of nonlethal actions. Nonlethal actions require collar information to verify effectiveness.

V. Establish Wolf Management Areas and Population Objectives:
Wallowa County Stockgrowers support the creation of wolf management areas or zones comprised of set population objectives within each zone. The purpose is to match wolf to prey population ratios, to address human health and safety concerns as well as livestock conflicts, and other issues. Management zones will allow areas that have been dealing with a high presence of wolves to control populations without waiting for the rest of the state to attain the same population. Producers in Wallowa County have worked diligently to follow the Oregon Wolf Management Plan with the understanding that as the population of wolves in Oregon increases they would be able to have some regulatory relief from the harassment and losses they have lived with for the past six years.

VI. Controlled Hunts:
Wallowa County Stockgrowers recommend the use of controlled hunts. These hunts can be localized to reduce depredation, harassment of livestock or wildlife, wolves in proximity of dwellings, farm and ranch operations or communities. Hunting would be allowed in specific pack areas with a priority toward livestock depredation, human health and safety and areas with documented declines in game populations.

Wolf management in general, needs to be accomplished locally without onerous and time-consuming oversight from regional or state level offices. Wolf management decisions, including lethal take, should be left to the local offices. This would increase the timeliness and effectiveness of these actions and would reduce the burden and cost of wolf management for ODFW, especially the district offices.

We encourage the Commission to accept Wallowa County Stockgrowers’ recommendations when revising the Wolf Conservation and Management Plan. We have observed wolf behaviors and experienced their impacts. Producers have done their very best as individuals and as a whole to avoid wolf confrontations. The lack of sound and consistent management tools further amplify the inherent management challenges and the impacts at stake.

Sincerely,

Jill McClaran, President
Members,

Cody Ross
Mark Flit Co.

Rick Mom
Lightly Bolt Co.

Lori Butterfield
Butterfield Farms Inc.

M. tortoise
Michael Winour

Tom M. Birkmaier
Birkmaier Ranch Inc.

William K. Mcadden
Mcadden Farms

Scott Shear
Triple Creek Ranch

Resource Management LLC
Sep 19, 2016

Commission Chair Finley

Dear Finley,

I am an Oregonian who believes that wolves are a vital part of America's wilderness and natural heritage and should be protected in Oregon. The Commission's review and update of the Oregon Wolf Conservation and Management Plan is an opportunity to reaffirm Oregon's commitment to endangered species conservation and to continue Oregon's leadership on wolf recovery. Please do not turn your back on Oregon's wolves or the citizens who care about them.

I request that the Commission maintain the protective and precautionary measures that made Oregon's wolf plan a model for wolf recovery nationwide. I am particularly concerned about efforts to introduce population caps and regulated take of wolves through hunting. The Commission should oppose such efforts and base any revisions to the plan on the best available, peer-reviewed science.

When the Commission voted to delist wolves last November, it did so with the assurance that protections would remain in the wolf plan. I hope you will stand by that promise. I believe that by maintaining protections for wolves and providing clarity for landowners, the Commission can continue wolf recovery and ensure broad public support of the agency and its conservation mission.

Sincerely,

Ms. Ashby Remley
1130 17th St NW
Washington, DC 20036-4604
aremley@defenders.org
Wolf Letter
September 19, 2016

The Oregon Cattlemen’s Association remains steadfast in the changes to the Oregon Wolf Plan, as were submitted the Commission in March.

I. Establish wolf management areas
   a. Management areas should consider areas where wolves can live without human/livestock conflict, available deer, and elk populations.

II. Investigations
   a. Two probable’s equal one confirmed.
   b. Established a third party appeals process.

III. Collaring
   a. In Phase III, fifty percent of all packs should have a GPS collar, with an emphasis on wolves to be in conflict with livestock

IV. Simplify management
   a. Simplify management decision making process to allow decisions to be made locally and swiftly.

V. Establish controlled hunts
   a. Within Phase III, to allow for controlled hunting, hunts can be localized as to address game population decline, livestock conflict, and health and human safety.

Sincerely,

Todd Nash

Wolf Committee Chair
Oregon Department of Fish and Wildlife Commission
4034 Fairview Industrial Drive SE
Salem, Oregon 97302
RE: Oregon’s Wolf Management Plan Revision
Sept. 20, 2016

Dear Chair Finley and Members of the ODFW Commission:

The Oregon Hunters Association (OHA) has been an active stakeholder during the wolf plan revision process. OHA feels the original plan was a successful working document. With wolf population growth, and expansion across the state, we feel that the current plan revision needs to clearly identify the transition from Phase II to Phase III – for most of the state, and develop language to support the intention of Phase III in Northeast Oregon – which is management of this species to be consistent with other economic and recreational interests of the state. OHA feels that the following points are very important for an effective revision of Oregon’s Wolf Management Plan.

- Phase II considers breeding pair thresholds but does not establish maximum numbers per district, region, or grouping of Wildlife Management Units within a given watershed. Many factors should be considered in this process, including ungulate population variables and areas of livestock depredation. Page 34 from the current Plan states, “As wolves become established in the state, wolf managers will be collecting data on wolf movements, pack home ranges, and other population parameters. This information coupled with data regarding wolf conflicts, could be used to set maximum population levels in the future,” and we are at that point in time in most of Northeast Oregon.
- The next plan will need to address hunting as a management tool since wolves are considered a special-status mammal within the game mammal category “once the wolf population objectives have been exceeded.” Under the heading of “Wolf Legal Status,” controlled take would be authorized as a response to chronic livestock depredation or wild ungulate populations experiencing either population or recruitment declines. Pertinent language, including guidelines and threshold triggers, need to be established for Phase III, and for moving through that phase over the next 5 years.
- Page 51 of the Plan states that upon reaching Phase III, “emphasis may be put on lethal control (of wolves) to ensure protection of livestock. In areas where chronic wolf problems are occurring, wolf
managers may seek assistance from private citizens through special permits for controlled take to resolve conflict.” The new plan needs to establish harvest criteria, and have action triggers based on both wolf population size and damage occurrence.

- Under the Plan section titled, “Strategies to Address Wolf-Ungulate Interactions” there is a need for language development for specific ungulate species, and the appropriate action taken. The current language states: “Active management (e.g. non-lethal or lethal removal) of wolves will be initiated in areas where ungulate species have been transplanted to supplement or expand their historic range, and if wolves are determined to be affecting the success of the transplant goal.” An example would be in the case of bighorn sheep, mountain goat, and potentially moose transplants.

- Similar language needs to be developed for common ungulate species valued by hunters, such as deer and elk, when they are seasonally concentrated. The original plan does address this by saying, “Active management of wolves may be initiated in important winter ranges or winter feeding sites that serve to draw ungulates away from agricultural lands. These sites may attract wolves and could cause them to abandon them in some circumstances.” More specific language is needed, including the recognition of critical sites, such as the Wenaha and Elkhorn Management Areas as examples.

OHA feels that it is important to maintain a balance between a rapidly expanding wolf population (36% growth annually) and the traditional, and highly cherished, resource uses of our great state – namely, big game hunting. Wolf population management will be essential for that balance moving towards the next revision in 2022 and beyond.

Sincerely,

Jim Akenson

Jim Akenson
Conservation Director
Oregon Hunters Association
September 23, 2016

To: Oregon Department of Fish and Wildlife

From: International Center for the Advancement of Pastoral Systems (ICAPS)

Ref/ Subject: Oregon Wolf Conservation and Management Plan Five Year Review

ICAPS, which is a non-profit organization located in Wallowa, Oregon, recommends implementing the following changes in Phase III of the Oregon Wolf Conservation and Management Plan:

I. Revise Initial Depredation Determinations.

Recommendation: USDA-Wildlife Services should be the lead entity investigating and making initial depredation determinations. In the absence of a Wildlife Services agent, the Oregon State Police should be the lead agency investigating and making the initial determination.

Rationale: This change will reduce the potential for conflicts of interest by the managing agency (i.e., Oregon Dept. of Fish and Wildlife). Also, USDA-Wildlife Services has agents in most counties experiencing wolf depredations.

II. Revise Appeals Procedure.

Recommendation: An independent review of a depredation determination should be made by a board consisting of representatives from the county offices of the sheriff, district attorney, and department of fish and wildlife. Their decision should reflect a simple majority vote of the board.

Rationale: The current appeals process is time consuming, non-transparent, and is not independent of the managing agency.
III. Revise Rules for Lethal Take:

Recommendation: Initiating a “lethal control” should be based on the following rules: i) an attack constitutes a depredation event; ii) two “probable” depredation events are equivalent to one “confirmed” depredation event; iii) two confirmed depredation events will require ODFW to move to lethal control; iv) if a depredation event involves more than one animal, the multi-animal event will be equivalent to two confirmed depredation events; v) a pattern of confirmed harassment (i.e., chasing, biting, and subsequent death) will be considered as a confirmed depredation event and count towards initiating lethal control.

Rationale: A wolf (or wolves) caught in the act of killing or harassing livestock can legally be killed by the livestock producer or an agent of the livestock producer (i.e., lethal control). The same legality should apply relative to initiating a “lethal control” by the managing agency.

IV. Collaring:

Recommendation: One or more wolves in all packs likely to have conflict with livestock should be collared. At a minimum, 50% of all packs in the state should be collared.

Rationale: Collaring facilitates wolf population monitoring, collection of scientific data, and verification of the effectiveness of nonlethal actions.

V. Establish Wolf Management Areas and Population Objectives:

Recommendation: Wolf management areas and population size objectives should be defined within counties and/or the state.

Rationale: Defined management areas will facilitate: i) establishing wolf population objectives, ii) determining appropriate predator-prey ratios, iii) resolving human health and safety concerns relative to wolves, iv) reducing wolf-livestock conflicts, and v) addressing issues that may develop in the future. This will allow control of wolves in areas exceeding population objectives independent of the total state population.
VI. Controlled Hunts:

Recommendation: Controlled hunts to reduce the wolf population in a management area exceeding the population objective should be initiated.

Rationale: Targeted controlled hunts will facilitate reducing livestock depredation, ensuring human health and safety, and preventing declines in wildlife prey populations below management objectives.

Sincerely,

Dr. Dennis P. Sheehy (Executive Director)