



Oregon Department of Fish & Wildlife

PUBLIC CORRESPONDENCE

- **Wolf Plan Review #1**

Roxann B Borisch

Subject: FW: NOT Environmental Groups

From: Steve L [<mailto:steveor24@gmail.com>]

Sent: Saturday, March 19, 2016 11:22 AM

To: odfw.commission@state.or.us

Subject: NOT Environmental Groups

Dear ODFW Commission,

I just read a statement from

Michelle Dennehy about how so called environmental groups participate in wolf management.

Cascading Woodlands, Center for Biological Diversity, Defenders of Wildlife, Oregon Wild. These groups are Not environmentalist and are certainly not conservation groups by any stretch of the imagination.

When Michelle Dennehy mentions that these groups have engaged in wolf management then I assume ODFW believes that part of wolf management includes lawsuits against them, lying to the public and blocking the wolf plan every chance they get. Is that correct?

I appreciate that ODFW has stuck to the original wolf plan and have worked hard to stick to that plan with known science and facts but for ODFW to continue to acknowledge these so called environmental groups is an insult to every Hunter and Fisherman and conservationist in Oregon and beyond and a disgrace to wildlife management.

These groups actually care nothing for the wolf or any other wildlife or environment and to say otherwise is completely ignoring all of the corruption and lies coming from these groups.

I realize that ODFW has to acknowledge these groups and work with them but the only reason you mainly do this is because of threat of lawsuits. ODFW needs to acknowledge at least to themselves that these groups are obstructionist and there main purpose is to make money and prohibit Hunting, Fishing and public use and access.

As you may have come to realize is that these so called environmental groups will say they will collaborate with ODFW, Hunting/Fisherman, Ranchers but this is just a stall tactic because as you have learned even when they sign off on something they will go against it the first chance they get.

I implore the ODFW to stop listening to these groups and tell the public how they continually impede biologist and lie. To do this will not hurt ODFW and will help wildlife and the environment because as you know even if you do work with these groups they will sue you and impede you every chance they get. They are not good people or good groups.

Sincerely,
Steve Langdon

Roxann B Borisch

From: wendy obrien <wendylwatson1966@outlook.com>
Sent: Sunday, March 27, 2016 2:51 PM
To: odfw.comments@state.or.us
Subject: Thank You (Wolves)

Dear ODFW Commission & Governor Brown,

Like most Oregonians, I care deeply about wolves and other native wildlife. I support ODFW's mission to "protect and enhance Oregon's fish and wildlife and their habitats". I am writing to commend your recent decision not to kill wolves of the Mt. Emily Pack and your efforts to prevent conflict through non-lethal measures.

I am also writing to encourage you to maintain important protections for wolves and carry forward parts of the wolf plan that have recently led to a reduction in conflict, provided clarity and transparency, and support defensible decisions like this. The rules under which the state has been operating since a landmark settlement in 2013 have made Oregon a model for the rest of the country in balancing conservation with legitimate concerns.

Let's keep it that way!

Sincerely,

wendy obrien
6108 N Walnut
Spokane, WA 99205

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

March 30, 2016

Dear ODFW,

My name is Shane Spillane and I am writing you this letter to ask that you reconsider reintroducing wolves into Oregon. As the Department of Fish and Wildlife, I think that you would have the most influence on overturning this law and getting the wolves out of Oregon.

The first reason I have for asking you to consider making this change is that the wolves do not benefit as much as they have a negative effect. The wolves being back here worries farmers when they go out to check on their livestock or the hunters when they are out hunting. Adding another predator to the food chain in Oregon is just going to make the deer and elk populations decrease even more. The wolves hunt in packs so they could slowly take out most of a farmer's herd with no problems whatsoever.

The second reason is because the deer and elk populations especially aren't as high as they use to be. The wolves are not gonna help them go up. If the deer and elk populations go down too far, then it would make people and the state lose a lot of money because there are people who guide hunts and that is how they make all their money. It would cost the state money because the hunters would stop buying tags.

The final reason I'm asking you to make this change is because I don't think that we need another big predator in Oregon. It just makes animal populations go down and farmers losing livestock and it causes a big danger to hunters. When they are out in the woods they have to worry about running into wolves. Or if the hunters kill something that their hunting like a deer, they have to worry about the wolves coming in while they are gutting and packing out the deer. I think that if we didn't have such big laws to protect wolves that hunters wouldn't feel as threatened while hunting and other animals like deer and elks population would go up. So I think we should reexamine the laws about wolves in Oregon.

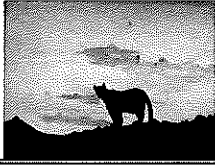
Thank you for considering my request.

Sincerely

Shane Spillane

Shane Spillane
Twelfth grade
Law and justice
Henley High School
8245 highway 39
Klamath falls, OR 97601





Erin Hauge
1559 5th Street • Sacramento, CA 95814
916-764-7953 • Advocate4Wildlife@gmail.com

April 2, 2016

Chair and Commission Members
Oregon Fish and Wildlife Commission
4034 Fairview Industrial Drive SE
Salem, OR 97302
odfw.commission@state.or.us, cc: odfw.info@state.or.us, odfw.comments@state.or.us

Dear Chair and Commissioners,

I am writing to express my deep sadness, shock and disappointment at the recent actions of the Oregon Department of Fish and Wildlife that killed the Imnaha pack family, including the much-loved alpha patriarch, OR-4, his likely pregnant mate, OR-39 and their two yearling pups. OR-4 will never be forgotten. He beat the odds of human persecution for all of his 10 years and was finally killed by a few humans who decided when to extinguish his legendary and tenacious life force.

It has only been a few weeks since Governor Brown signed the delisting order for Oregon wolves and to move in this drastic and tragic direction of killing entire wolf packs so quickly is deeply disturbing and speaks to a Phase II of Oregon's state wolf plan that is not prepared or sufficient to manage wolves.

There are many questions about what led to this kill order. How is it that OR-4 - an ancient wolf by wild standards and one who is well known and loved and has given Oregon so much in terms of its wolf recovery legacy - can be so unceremoniously wiped from the face of the earth when determined to be a nuisance by a special interest group? And were all non-lethal deterrents being employed and documented prior to issuance of the kill order? One thing is certain: OR-4 and his pack family did not have to die and should be with us still today.

When wolves were being managed under Phase I provisions of Oregon's wolf management plan, it was extremely successful because the wolf population grew, livestock depredations decreased, and there was transparency and accountability. Everyone on all sides knew what to expect and what was required and this created understanding and trust.

But now that wolves are being managed under Phase II provisions, there are fewer requirements and they lack direction, meaning more wolves will die. And, as sound science tells us, as wolf packs are splintered there will be an increase, not a decrease, in conflicts.

As the wolf plan undergoes its five-year review, I would certainly expect the state to acknowledge that Oregon's plan was once touted as an exemplary model but that in order to keep that status the state must bring forward into Phase II and Phase III the requirements and definitions that applied in Phase I.

Let OR-4 and his pack family be the warning that it is easy to fall from an exemplary management model to one that simply kills wolves at the behest of special interests. Oregon must continue to put forward a non-lethal wolf management model with clear direction along with education about coexistence. It is too late for OR-4, but his legacy lives on and the world is now watching. What Oregon does to protect that legacy remains to be seen.

Thank you for your consideration.

Erin Hauge

Erin Hauge
Certified California Naturalist
Wildlife and Habitat Conservation Advocate

ODFW WildlifeInfo

Subject: FW: wolves

From: Nick Lorence [<mailto:nicklorence29@gmail.com>]

Sent: Saturday, April 23, 2016 7:59 PM

To: ODFW.WildlifeInfo@state.or.us

Subject: wolves

Hi, I have a question regarding the department of wildlife and the plan for wolves. It has come to my attention that there is a mating pair of wolves on sheep mountain in the pine creek unit. I would like to know if you plan to do something about this or is oregon going to follow the same downward spiral that Idaho and other states have fallen into. Do we really think that Oregon can afford to have another apex predator?

I would like to hear the logic behind having wolves and what has drove the decision to allow them to establish themselves?

Thank you, nick lorence

ODFW WildlifeInfo

From: Douglas Hinton <dougthelesser@outlook.com>
Sent: Monday, April 25, 2016 9:31 PM
To: ODFW.WildlifeInfo@state.or.us
Subject: Wolves & Rancher lobby

Ladies and gentlemen, surely there is a better way than killing wolves to protect a well funded, self serving industry that does not respect the concept of conservation, and manipulates you into making bad decisions. Public lands and resources(ie wolves) are not the same as private lands, protecting ones private property is different than an industry setting your protection policies. Please stand up to these people and hold them accountable. A well functioning ecosystem benefits every one. Just like the wedge pack up here in Washington, please consider the fact that the said ranchers put cattle right smack in the middle of a known wolf packs territory...what did we expect to happen? Ranchers like everyone else need to adjust to the realities of our times. Teddy Roosevelt bucked the power lobbies in his time (he was a republican by the way) and the existing parks and refuges we have today are invaluable and irreplaceable...Olympic National Park comes to mind...Please do the right thing and fix this mess, stand up to the ranchers and their bought politicians and base your decisions on science and not lobbyist's arm twisting, Your wolf plan needs to change. Thank you for the forum sincerely Douglas Hinton

Sent from Windows Mail

Roxann B Borisch

Subject: FW: Oregon Wild Comments on Wolf Plan Review
Attachments: Oregon_Wild_2016_Wolf_Plan_Review_Comment_1.pdf

From: Rob Klavins [<mailto:rk@oregonwild.org>]
Sent: Tuesday, May 03, 2016 3:31 PM
To: Russ Morgan <Russ.L.Morgan@state.or.us>
Cc: Roblyn Brown <roblyn.brown@state.or.us>; Brett Brownscombe 2016+ <brett.brownscombe@oregon.gov>; odfw.commission@state.or.us; Lena Spadacene <ls@oregonwild.org>
Subject: Oregon Wild Comments on Wolf Plan Review

Hello Russ,

Attached please find a document that attempts to boil down and put in ink some of our top level concerns for the upcoming review of the Oregon Wolf Conservation and Management Plan.

I can't provide enough disclaimers that despite overshooting my attempt at a "one-pager" it's still likely incomplete. I'm sure we've missed some entire points, and I know I've not provided full background on each one. Many of them will be ripe for further discussion.

It seems we are still very much at the beginning of this process and I anticipate additional discussions and documentation. Though now a bit dated, many of our 2010 comments remain relevant and if it would be helpful, I'd be happy to share the relevant ones with you again.

As I mentioned in the attached document, it would be very helpful to get a more concrete understanding of how ODFW expects the process to play out. The dates on the ODFW Commission website seem ambitious and we've gotten mixed messages as to whether they really mean anything or not.

Additionally, I can't help but reiterate our lingering concerns over recent actions by ODFW, other decision makers, and other stakeholders. We are doing our best to put aside our skepticism and are engaging in this process in good faith. We hope our collective interests in wolf recovery & conservation, conflict prevention, broader public understanding, and trust in the agency will be advanced for doing so.

As I think I mentioned earlier, I will be mostly out of pocket from May 6th to the 27th. If you need anything in a timely fashion from Oregon Wild during that time, please contact Lena Spadacene, Steve Pedery, or call my cell phone. If you anticipate needing to touch base before then, please feel free to reach out in the next couple days.

Best,
Rob

--
Robert Klavins
Northeast Oregon Field Coordinator
Oregon Wild | www.oregonwild.org
541.886.0212 | rk@oregonwild.org



**OREGON
WILD**

Formerly Oregon Natural Resources Council (ONRC)

www.oregonwild.org

May 3, 2016

Russ Morgan, Wolf Program Coordinator
Oregon Department of Fish & Wildlife
107 S. 20th Street
La Grande, OR 97850

Re: 2015 Wolf Conservation & Management Plan Review

Russ,

Despite serious lingering concerns, we are looking forward to working in good faith with ODFW and other stakeholders on the 5-year review of the Oregon Wolf Conservation and Management Plan. We hope we can collectively achieve shared goals of meaningful wolf recovery, reduced conflict, and restoration of public trust in the agency.

We appreciated your candid feedback that our vision for the Plan was not well-detailed at the most recent Commission hearing. We hope this document will begin to provide clarity. However, it is neither comprehensive nor detailed. As the process evolves, we expect there will be much more to discuss. We look forward to better understanding the interests of other stakeholders and the decision space of the department. We welcome as much clarity as you and the Commission can provide regarding timelines and details of the process. As you are keenly aware, wolves are of interest to many members of the broad public that ODFW serves and we hope everyone will have a chance to be heard.

Below please find an initial and incomplete list of items of concern in the coming Plan review. Given the complexities and history of the Plan, we'll continue to follow up to provide more background and address things we have missed.

Overarching Perspective:

We continue to support the framework of the Wolf Plan. However, it's notable there was not full agreement on the Plan in 2005 or after its 2010 revision. Since a 2013 settlement between the Oregon Cattlemen's Association, Oregon Wild, Cascadia Wildlands, ODFW, and the state, most stakeholders have agreed that the Plan worked under Phase 1. Post-settlement Phase 1 provisions provided certainty to all parties. Under those conditions, Oregon was the only state in America with a meaningful wolf population that did not kill wolves despite the authority to do so. The wolf population grew, by most measures conflict decreased, and Oregon was seen around the country as a model. Since the transition to Phase 2, that has not been the case.

When the Plan was written in 2005, wolves had not yet established themselves in Oregon, so ambiguity in Phase 2 and 3 was understandable. We've learned a lot since then. It makes sense to clarify ambiguity that led to conflict in pre-settlement Phase 1 and has already led to controversy in Phase 2. Taking those lessons into account, we support carrying forward parts of the Plan that worked and addressing those parts that fell short or fed conflict. To achieve the latter, we believe it makes sense to identify the intended goals of those provisions and make adjustments that may better or more efficiently achieve those goals rather than discard them entirely. We also hope the updated Plan will take into account new scientific understanding about wolves, wildlife conservation, conflict deterrence, and public values.

We must re-iterate that ODFW's mission is to "protect and enhance Oregon's fish and wildlife and their habitats for use and enjoyment by present and future generations". Wildlife belongs equally to all Oregonians, and ODFW serves all Oregonians.

We support:

- To best honor the original framework of the Wolf Plan – where words and concepts are referenced in multiple phases of the Plan – carry forward Phase I definitions and clarity of concepts to other phases. Given that the Commission has already extended settlement provisions for lethal intervention sought by the livestock industry into future phases, it makes sense to do so to other Plan provisions as well. Specifically, that includes things like:
 - A defensible definition of “chronic depredation” of 4 qualifying incidents in 6 months reasonably attributed to a known wolf or wolves.
 - Reasonable limits on kill orders – time limits, satisfied by killing wolves, etc.
 - Requirements for implementation and documentation of basic minimal non-lethal conflict deterrence efforts prior to consideration of killing wolves.
 - Transparency requirements from the agency to the public and between livestock operators and the agency.
- Affirmation of conservation goals, the importance of education and research, and the need to proactively prevent rather than simply respond to conflict.
- Maintaining ODFW authority on investigations of depredations through transparent, enumerated procedures and training protocols in all phases of the Plan.
- Giving conservation higher priority on public lands without devaluing conflict deterrence on private lands.
- Full funding.
- Efforts to reduce poaching and enforce/reform existing poaching laws.
- Better understanding and a focus on conflict prevention efforts and law enforcement activities by:
 - Mapping areas of wolf presence, livestock presence, poaching, and depredation.
 - Enabling and encouraging coordination between agencies (e.g. USFS & BLM) and livestock operations to reduce conflict by doing things such as ensuring livestock are less likely to be present in areas of high potential conflict, attractants are not improperly placed, and pasture rotations take into account timely information.
 - Continuing to seek, embrace, and promote new and proven non-lethal conflict deterrence measures.
- Consideration of reform to other programs that may exacerbate conflict (feeding stations, compensation, killing competitions, etc.).
- Consulting independent non-agency scientists to review/update cited scientific literature and the Plan itself.
- Adjusting management objectives that trigger Phase 2 and 3 to better comport with scientifically defensible definitions of recovery.
- A review of the costs and benefits of ODFW’s program of sharing location data with members of the public. This program must not expand to provide more timely or specific location data.
- Utilizing a neutral facilitator to manage multi-stakeholder discussions.

From other stakeholders, we heard:

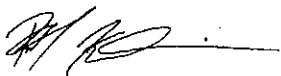
- Support for *de facto* wolf hunting
 - We oppose wolf hunting in Oregon.
- Support for population caps
 - The Wolf Plan already has management objectives and scientifically indefensible low minimum “conservation population objectives”. If such objectives are adjusted, they should be science-based, subject to independent scientific review, and allow for natural processes to play out in time and space. The agency must not create population maximums and should clearly re-affirm that objectives are not intended to be population caps above which wolves will automatically be killed. This was the source of a great deal of discussion in 2005. Allowing any sort of population cap would be a radical departure from the 2005 plan, 2010 revision, and 2013 settlement.
- Support for management zones
 - Depending on what they mean, “management zones” could provide helpful tools. They could also undermine the Plan’s goals of wolf recovery and minimal conflict. Any management zones must take into account the best available science. They must not be wolf-exclusion zones, subject to political whims, devolve management of public trust resources to the local level, or otherwise be arbitrary.
- Support for baiting wolves and other wildlife
 - Where baiting programs cause conflict, removal of attractants should be prioritized over killing native wildlife.
- Support for killing wolves to address ungulate decline
 - Killing rare wildlife to keep more common species common should not be considered. Killing rare wildlife to benefit other rare wildlife should only be considered when it can be clearly and unequivocally demonstrated that the wildlife to be killed is the primary driver of an unnatural decline, that other measures could not ameliorate the situation, and that doing so will solve the problem without requiring more killing. Any such decisions should be subject to public comments and independent scientific review. The ungulate decline provisions of Phase 3 should be clarified, scientifically defensible, and honor ODFW’s broad mission, or be eliminated.
- A proposal to count “probable” depredations as 0.5 “confirmed” depredations.
 - This proposal is absurd. Oregon’s devolving compensation program is flawed, lacks oversight, and already produces perverse incentives. If creative accounting of depredations is to be considered for compensation or lethal intervention, it must not simply be a process of lowering the bar. Negatives should be considered for depredations where attractants are present or proximate, where sufficient non-lethal conflict prevention measures are not demonstrated, and for investigations that result in classifications of “other” and drain agency resources.
- Support for collaring more wolves
 - We acknowledge collaring wildlife will continue to be a tool employed by ODFW. The practice has decidedly positive and negative implications. It is dangerous (for wolves and people) and it is expensive. We oppose arbitrary or burdensome collaring requirements. To the extent collaring is employed, it should be in the service of wolf conservation, research, increasing social acceptance, and conflict *prevention*.
- Request for third-party review of ODFW depredation investigations
 - ODFW subjected its procedures to independent analysis that resulted in a generally positive review. Investigations conducted by outside agencies, elected officials, and local veterinarians have been the source of unnecessary conflict. Any third-party review of ODFW decisions should be at the cost of those requesting the review. If any such reviews are given weight in management decisions or the distribution of taxpayer dollars, they must be carried out by truly impartial and qualified actors.

We must reiterate that this is not a comprehensive list. As we review the Wolf Plan itself, past communications, and hear more from the agency and other stakeholders, we expect the conversation will evolve. We are pleased that Oregon's recovering wolf population has increased. Though we won't fully recount them here, we would be remiss not to reflect public concern over recent actions by ODFW, the Commission, Governor Brown, the legislature, and some stakeholders that jeopardize wolf recovery, tenuous relationships, and public trust.

Oregon Wild has been pleased to support and defend the Oregon Wolf Conservation and Management Plan since 2005. However that support should not be taken for granted.

It is our sincere hope that when this process culminates in a proposal to the Commission, we will be able to encourage Commissioners to vote "aye" on a Plan that honors ODFW's mission to "protect and enhance Oregon's fish and wildlife and their habitats for use and enjoyment by present and future generations".

Thank you,



Rob Klavins
Northeast Oregon Field Coordinator
Oregon Wild, Enterprise

Cc: Fish and Wildlife Commission
Governor Brown
Roblyn Brown

www.oregonwild.org

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Roxann B Borisch

Subject: FW: Please Continue Gray Wolf Protections

-----Original Message-----

From: Marla de Vries [mailto:m.de.vries@live.nl]
Sent: Tuesday, May 03, 2016 1:20 PM
To: odfw.commission@state.or.us
Subject: Please Continue Gray Wolf Protections

To: Director Melcher, Chair Finley, and ODFW Commissioners,

This last week, media headlines across Oregon featured the first wolf pack in California since 1924! That success is likely a direct result of the increasing number of wolves migrating from Oregon's northeastern corner to the southern Cascade Range. California Fish and Wildlife Director Bonham is quoted stating, "This news is exciting for California."

The Oregon Department of Fish and Wildlife should allow itself to take credit for this development, with Oregon leading the region with the strongest and most successful wolf management plan in place.

Though this is exciting news, it's important to recognize that many regions in Oregon are still without a recovered wolf population. The Commission is currently considering whether to remove gray wolves from Oregon's endangered species list, and scheduled to review and amend the current wolf management plan. As you consider revisions to the management plan, I urge the Commission to not backtrack on the progress Oregon has made by making it easier to kill wolves.

With the state of California and many parts of Oregon reliant on wolf recovery, the Commission should commit to stronger protections. The continued promotion of non-lethal tools to prevent greater conflict has been a key element to the management plan's success. It has been working, but Oregon's wolf population is not yet recovered. The Commission should not back away from its commitment to this conservation success story, but rather, use this opportunity to reinforce the aspects of the current plan that have been proven effective.

Marla de Vries
Lijsterbesstraat 10
Eibergen, the Netherlands, ot 00000

Roxann B Borisch

From: Michelle Tate
Sent: Monday, May 16, 2016 11:21 AM
To: Roxann B Borisch
Subject: FW: Center for Biological Diversity comments on five-year Wolf Plan review
Attachments: Ltr from CBD to ODFW - May 2016.pdf

From: Amaroq Weiss [mailto:aweiss@biologicaldiversity.org]
Sent: Tuesday, May 10, 2016 1:38 AM
To: 'Russ Morgan' <russ.l.morgan@state.or.us>
Cc: roblyn.brown@state.or.us; 'BROWNSCOMBE Brett * GOV' <Brett.BROWNSCOMBE@oregon.gov>; odfw.commission@state.or.us
Subject: Center for Biological Diversity comments on five-year Wolf Plan review

Hello Russ:

With the five-year Wolf Plan review now underway, I wished to send you some of our primary concerns and hopes on key issues. I testified regarding a number of these at the March commission meeting, but have elaborated further here and touched on a few additional points. Our comments are attached.

As always, please don't hesitate to get in touch with me if you'd like to discuss anything addressed in our letter.

Regards,
Amaroq

Amaroq Weiss
West Coast Wolf Organizer
Center for Biological Diversity
707-779-9613
aweiss@biologicaldiversity.org
www.BiologicalDiversity.org

"Watching wolves, they have great messages, . . . if you're not always looking at them through the scope of a rifle."

- NPS wolf biologist Doug Smith, quoted in *The Spine of the Continent* by Mary Ellen Hannibal



May 10, 2016

Russ Morgan, Wolf Program Coordinator
Oregon Department of Fish and Wildlife
107 S. 20th Street
La Grande, OR 97850

Dear Russ,

With the Oregon Wolf Conservation and Management Plan five-year review underway, we are writing to underscore some of our most prominent hopes for and concerns regarding the Plan going forward. I testified at the Oregon Fish and Wildlife Commission's March 18th meeting regarding most of these points, but am writing to ensure they are on the record with you/ODFW as you undertake the initial draft revisions or updates you will ultimately put before the public for comment. I've elaborated a bit more here, however, than I did in my testimony, and I've also included some additional points.

We've seen the letter you received last week from Oregon Wild. We are in agreement with the points set forth on page two of that letter, of items supported. And we agree with the positions stated on page three, in response to testimony given by other stakeholders at the March 18th commission meeting. We additionally wish to highlight the following hopes and concerns:

Public support for wolves

The overwhelming population in Oregon supports wolves. All Oregon surveys and polls from 1999 to the present demonstrate this, as do the comment letters the commission receives during any process involving wolves. Without exception, 90-95 percent of comments received by the commission/ODFW support wolf recovery and request more protections for wolves.

ODFW's mission is to "protect and enhance Oregon's fish and wildlife and their habitats for use and enjoyment by present and future generations." This mission is to be fulfilled by ODFW for the benefit of all Oregonians – for both consumptive use and enjoyment by those who buy licenses, permits or tags for hunting, trapping or angling, and for nonconsumptive use and enjoyment by hikers, wildlife watchers, nature photographers, writers and artists, and those who seek solitude in nature and for whom seeing the tracks of a wolf or hearing a wolf howl brings a measure of redemption to the human spirit.

Because wildlife is a public trust, which the state must steward for all of the public – not just those who buy licenses or tags and not just those whose location or source of income may be

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impacted by wolf presence -- the overwhelming support for wolves and wolf recovery in Oregon has to be the fundamental driving thought behind the Wolf Plan and any Plan updates.

The following things need to be done to conserve wolves

Wolves must be allowed to expand in population size and across their former historical range. During the March 18th commission meeting, there was testimony by some stakeholders that the Wolf Plan should set population caps and create “management zones.” As to the latter term, since the Wolf Plan already provides for the designation of Areas of Known Wolf Activity (AKWA) and Areas of Depredating Wolves (ADW), both of which are surely management zones, we suspect that what is being requested is in fact zonal/range restrictions imposed on wolves.

As a member of the stakeholder wolf advisory group which assisted ODFW in preparing the state’s Wolf Plan that was ultimately adopted in 2005, I can state that these two concepts were thoroughly vetted in our discussions and both population caps and restrictions on where wolves would be allowed to inhabit within the state were rejected.

During this five-year Plan review, there must be no setting of a population cap or range restrictions. For any faction to suggest either is necessary is nonsensical. Science tells us wolf populations are chiefly regulated by two mechanisms – prey availability and territory availability (also referred to as “self-regulation”). Wolves rarely tolerate presence of unrelated wolves in their territory, and how much territory a wolf pack needs depends on prey availability. Nothing has changed scientifically in this regards since the adoption of the Wolf Plan in 2005. Further, given that wolves currently occupy little more than 12 percent of habitat which ODFW has identified as currently suitable, recovery of the species in the state is a long ways off; restricting the range and/or capping the population would serve as barriers to the full recovery of the species.

ODFW and the Commission must rely on science, not assumptions or threats, to adequately address the issue of human tolerance for wolves and to reduce and prevent poaching of wolves. At the federal and state level, agencies long have touted and adhered to the philosophy that in order to conserve wolves, wolves must be killed; that if wolves are not killed, social tolerance for wolves will decrease. This philosophy, however, has been brandished without a stitch of data collection or analysis in support, and it has been debunked. Last fall, during the delisting consideration, Dr. Adrian Treves was one of two-dozen scientists who submitted a comment letter to the commission. His Carnivore Coexistence research laboratory at the University of Wisconsin is the only one in the world to have measured changes in individual human’s tolerance for wolves over time and attitudes under changing policies on lethal management and delisting. In multiple published papers -- as he described in his comment letter - - conclusions from his team’s research are that the lifting of protections for wolves, government agency killing of wolves for conflicts, and state-sanctioned hunting and trapping seasons for wolves have resulted in a decline in tolerance for wolves, and that under these circumstances, poaching of wolves increases.

In every state where wolves have returned there are – and will always be – a faction which issues threats that if the agency does not let them kill wolves, or that if the agency doesn't kill wolves, the people who comprise that faction will be spending every spare minute shooting, shoveling and shutting up. No doubt it is incredibly stressful to agency staff to have to deal with these threats, but the Wolf Plan must not be revised in any fashion which gives them credence. When people demand blood, such as killing, and are given the opportunity, the more blood they will want. That's human nature.

ODFW is mandated to use the best available science in conserving and managing wolves. We urge you to read the body of work being published by Treves and his colleagues, regarding social tolerance and wolves not only in North America but in other parts of the world, as well, and to consult with these scientists so as to gain the best understanding of what current science has to say on this topic. The Plan update should include a full discussion of the current science on social tolerance for wolves and any new policies proposed as part of the Plan update should be based on this current science.

We also urge you to discuss in the Plan update the need for ODFW to work with legislators to fix the damage that was done to House Bill 4046, when an amendment was added which eviscerated the increased poaching fines for wolves. You will recall that at the November 2015 commission hearing, the commission directed ODFW to get a bill introduced to increase the poaching fines for wolves. House Bill 4046 was introduced via bipartisan sponsorship to amend the then-current poaching fines law. In its first iteration, no increase in poaching fines for wolves was even included. Only after prodding by conservation groups did the bill get amended to include wolves and to increase the poaching fine for this species. However, this provision was then gutted by another amendment which makes the fine inapplicable if the animal poached was killed while the killer was engaged in an otherwise lawful activity. As we explain later on in this letter, this completely absolves anyone who shoots a wolf but claims he or she thought the animal they were shooting was a coyote. Since coyote-killing is legal year-round in Oregon and without bag limits or weapons restrictions, and since the "I thought it was a coyote" defense is frequently raised in wolf-killing cases, House Bill 4046, as passed and signed into law, will do nothing to decrease wolf poaching and may actually encourage poaching to take place.

Wolves must not be scapegoated for declines in wild ungulate populations. In every state where wolves are returning, it is claimed by a vocal and powerful minority that wolves are decimating wild ungulate populations. But wolves must not be scapegoated for this, especially not when science tells us that the chief drivers of wild ungulate populations are habitat conditions and severity of weather events. ODFW Wildlife division administrator Ron Anglin testified earlier this year that, in conducting this five-year Wolf Plan review, ODFW will be looking at the draft California wolf plan for the science it contains. I recently completed a two-year stint as a stakeholder representative in the California planning process and I can tell you that plan peer reviewer Dr. Cristina Eisenberg (an alumnus of Oregon State University, authority on trophic cascades, Aldo Leopold scholar, and member of the Boone and Crocket Club) strongly criticized the California draft plan's strategy of killing wolves for impacts on wild ungulates, and stated bluntly that wolves must not be scapegoated in this fashion.

State wildlife agencies in all three northern Rockies states have, since 2012, been proclaiming banner years for elk numbers and hunter harvest success rates. Montana and Wyoming have both reported elk numbers at or above objective in most or all units. In March, the Idaho Department of Fish and Game reported that 2015 represented the highest whitetail deer harvest since 1991, the highest elk harvest since 1996, and hunter participation that's been on an upward trend since 1973. That same month, a Capital Press article reported Idaho farmers and ranchers statewide are experiencing costly consumption of crops and haystacks at "near-crisis levels" by "increasingly large ungulate herds."

While it is accurate that in some limited areas, where habitat conditions for wild ungulates were already poor and declining, that wolf predation may be having an additive effect on localized ungulate populations, it is not accurate to say that wolves are the sole cause for ungulate declines there and, these localized scenarios are the exceptions, not the rule. ODFW and the Commission must not be held hostage to fantastical claims that wolves are driving elk and deer herds into the ground in the northern Rockies and that interest in deer and elk hunting has declined because of wolves. The Wolf Plan update should include information on elk herds in the northern Rockies being at or above management unit objectives and of the record high harvests of elk and whitetail deer. Within the last year, the Washington Department of Fish and Wildlife has also released study results showing no impact from wolves on wild ungulate populations and this information should be included as well. Inaccurate public perception regarding wolves can become a driver of state policy, management strategies and legislation. The updated Wolf Plan is an excellent forum for providing accurate, science-based information regarding wolf-wild ungulate interactions and effects.

The following things have occurred which seem designed to undermine wolf recovery in Oregon:

- The wolf delisting process was conducted prior to the required five-year review, thus not knowing what regulatory mechanisms would be in place going forward.
- This Commission failed to have an outside panel of expert scientist peer reviewers assess ODFW's status review and population viability analysis (PVA).
- The comments of two dozen scientists who found ODFW's report and PVA to be fundamentally flawed and illogical, and found that wolves had not scientifically met the delisting criteria was entirely ignored by the Commission – not one of the scientists was even contacted to discuss their criticisms.
- A bill was passed and signed into law, HB 4040, which ratified the commission's delisting decision, thus substituting the judgment of legislators and a governor for that of scientists and a court of law.
- A bill the commission requested, to increase poaching fines for wolves, HB 4046, did increase the fine but also added a section excusing anyone who kills any of the animals named in the statute if the killing was an unintentional taking incidental to an otherwise lawful activity. This means there now exists a law which provides an absolute defense to

anyone who shoots a wolf but claims they thought it was a coyote, rendering the increased fine meaningless and placing wolves at significantly higher risk of being killed. This statute codifies the federal McKittrick policy, which says, if they did it by accident, no harm no foul. This creates a social and legal environment for ranchers, hunters and anti-government adherents to go out and kill wolves. In this statute the State is saying, "Claim it was an accident and we'll turn our back." The legislature may as well have passed a bill that said open season hunting on wolves is now legal – because that's the effect of this new law.

In looking at all of this, one might ask, was there a concerted plan to undermine the recovery of wolves in Oregon?

Irrespective of why all these things were done which undercut wolf recovery, an update of the Wolf Plan can remedy this situation. An update of the Wolf Plan can contribute to meaningful wolf conservation and recovery if:

- The Commission and ODFW rely on the best available science;
- The Commission and ODFW commit to peer review of scientific reports prepared by ODFW which are being used by the Commission to make decisions about wolf management;
- The clarity of conservation measures and requirements that were agreed to in Phase I due to the 2011 lawsuit settlement are carried forward to Phase II and Phase III; and
- No current provisions of the Plan that are protective of wolves are altered to be less protective.

The past year of wolf-related actions, as described above, have been unsettling, to say the least. We hope the five-year Plan review process and any revisions that are ultimately adopted are based in science and honor the state's public trust obligations. We appreciate the opportunity we had to weigh in with the commission and to now weigh in with you. We look forward to gaining more clarity on what ODFW's focus will be and how we and the public can weigh in at such time as draft revisions are put forward by you and fellow ODFW staff.

Sincerely,



Amaroq Weiss, M.S., J.D.
West Coast Wolf Organizer
Center for Biological Diversity
707-779-9613 / aweiss@biologicaldiversity.org

cc: Oregon Fish and Wildlife Commission
Governor Kate Brown
Roblyn Brown

Roxann B Borisch

From: Wally Sykes <captmayo@eoni.com>
Sent: Monday, June 13, 2016 3:16 PM
To: Russ Morgan
Cc: ODFW Commission
Subject: WS Wolf Plan Review comment 2016013.pdf
Attachments: WS Wolf Plan Review comment 2016013.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Forwarded to Wildlife

Hi Russ -

Please find attached my initial comment on the Wolf Plan Review.

Best,

Wally Sykes

Walter H. Sykes
PO Box 733
Joseph, OR 97846

June 13, 2016

Russ Morgan, Wolf Program Coordinator
Oregon Department of Fish and Wildlife
107 S. 20th Street
La Grande, Oregon 97850

Dear Russ:

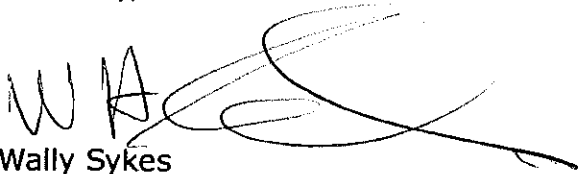
In regard to the Five Year Wolf Plan Review now underway, I'm writing to express my agreement with the three documents pertinent to the Review you have recently received from Oregon Wild (May 3, 2016), Center for Biological Diversity (May 10, 2016) and Cascadia Wildlands (June 2, 2016).

I especially wish to emphasize agreement with the concern expressed by all three organizations for creating and maintaining the clarity and predictability of conservation measures and requirements existing in Phase I as a result of the 2011 Settlement, and extending them into Phases II and III of the Wolf Plan.

The Department has exercised proper and commendable restraint in its management of wolf predation on livestock by the Mt. Emily pack and others, but it has been a matter of ODFW discretion rather than as a policy clearly and unambiguously set forth in the Wolf Plan. Existing ambiguities in Phases II and III should be erased.

Thank you for the opportunity to comment on the review of the Wolf Plan, and I look forward to contributing to further discussions.

Sincerely,


Wally Sykes