

Exhibit A

**Wolf Conservation &
Management Plan**

**Additional
Public Correspondence received
May 4, 2017 to May 17, 2017**

May 4, 2017

Michelle Tate, Director's Office
Oregon Department of Fish and Wildlife
4034 Fairview Industrial Drive SE
Salem, OR 97302



Re: **Public Comment on Review of Wolf Management Plan**

Dear Ms. Tate:

My wife, Mary Ann, and I would like to officially submit these comments into the public record regarding the review of the Wolf Conservation and Management Plan. **We fully support the sustainable recovery of wolves, a keystone species, into the totality of our state where they find suitable habitat.**

For 25 years we have lived in, and enjoy a very rural area north and east of Estacada, just several miles from the Salmon-Huckleberry Wilderness. Bear, cougar, bobcat and coyote are frequent predators that utilize our property. We embrace the presence of these creatures, and they have never caused us any trouble on our 85 acres. The vast majority of our property is in timber management. Our local elk herd and many black-tailed deer frequent the area. While we enjoy viewing the elk and deer, as a result of severe browsing, both of these ungulate species have done quite a bit of damage to our reforestation efforts when their populations are high. We welcome natural predation control on the deer and elk populations by cougars (and perhaps to some extent by bears and coyotes) and, we hope in our lifetime, wolves will be added to this predator mix. This type of control will further strengthen these populations. The wolves will require the deer and elk to become more vigilant and mobile, thus further reducing browsing. This is how it has been for millennia, until European settlers began extirpating the wolves (and many cougars and other predators). Oregon has done a very good job in rebuilding and managing cougar populations, allowing them to thrive (according to the ODFW Cougar Management Plan, their populations were estimated to be about 6,200 in October of 2015), but yet keeping an eye on their populations, and we believe the same should be done for wolves.

Wolves have not yet sufficiently or significantly expanded their range out of northeastern Oregon. To our knowledge, the Rogue Pack remains the only known wolf pack outside of northeastern Oregon. We further understand that only 112 wolves were counted in Oregon in 2016 (constituting 11 packs), only two more wolves than in 2015. This does not, in our view, signify that a healthy and diverse population level has been reached that will allow for continued growth and expansion throughout the state. The killing of wolves should only be done when absolutely necessary, based upon a set of agreed-upon criteria that can be verified by competent, independent experts. **We do NOT support the killing of wolves by members of the public until such time as their populations statewide have reached a reasonable carrying capacity, similar to what is allowed for cougars.**

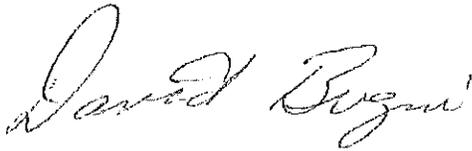
We have watched over the past several years as livestock losses, wolf poaching and other conflicts have increased as a result of the wolf reintroduction. This has led to mistrust and some litigation. The Wolf Plan should focus on enforceable, transparent and defensible standards that enhance recovery and prevent conflict. ODFW should put more emphasis on wolf public education programs and non-lethal conflict deterrence efforts, and less emphasis on the killing of wolves. We support, and would contribute towards, a compensation fund for those Oregonians who have lost livestock due to wolf predation, if such an effort is deemed to be practicable public policy.

We oppose any efforts to weaken the Wolf Conservation and Management Plan. Wolves are only starting to disperse to western Oregon. (We understand that wolves in eastern Oregon have entered Phase III in management levels, which is laudable, but this milestone should not initiate a reduction in needed conservation efforts.) In order to allow wolves to return to suitable habitat throughout our great state, we need, through smart public policy efforts, to institute strong and thorough protections.

We greatly respect, and have worked in partnership with the ODFW for many years on salmon and steelhead conservation and stream restoration efforts on our property, and we would hope that you will continue your agency's goals to protect and enhance all of Oregon's native fish and wildlife for present and future generations. We believe we are at a key moment in the history of this wolf species in Oregon and all efforts should be expended to ensure their continued and healthy survival.

Thank you for reading our comments and opinions on this critical issue, and we trust you will consider them in your public policy development process.

Sincerely,

A handwritten signature in cursive script that reads "David Bugni".

David Bugni

A handwritten signature in cursive script that reads "Mary Ann Bugni".

Mary Ann Bugni

30265 SE Kowall Rd.
Estacada, OR 97023
503-502-7213
dbugni@cascadeaccess.com

Roxann B Borisch

From: ODFW Commission
Subject: Protect our wolves!

Commissioners:

For your information. 619 people have sent the letter below. I will have a list of those who submitted this letter in your supplemental public correspondence packet on Friday, May 19.

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

From: Defenders of Wildlife [mailto:ecomunications@defenders.org] On Behalf Of Pat LeBaron

Sent: Friday, May 05, 2017 7:30 AM

To: Commission Chair Finley <odfw.commission@state.or.us>

Subject: Protect our wolves!

May 5, 2017

Commission Chair Finley

Dear Finley,

I am an Oregonian, and I am deeply concerned that the draft Wolf Plan does too little to protect our state's small population of wolves. This is very troubling in light of the 2016 annual wolf report, which showed a decline in packs and breeding pairs. I am adamantly opposed to any hunting of wolves by private citizens when there are so few wolves in Oregon. This proposal is yet another step backward since the Fish and Wildlife Commission voted to delist wolves from state protection. With only 112 confirmed wolves in the state, the Commission should be focused on protecting wolves and not prematurely decreasing protections.

I appreciate that the draft Wolf Plan includes some promising developments, including the formation of a citizen advisory group, which seems long overdue, and clarification about how the agency will respond to population declines. However, there are several proposals in the draft plan that could undermine wolf recovery in Oregon.

I am worried about the lowered standards for lethal removal, without any requirements for nonlethal deterrents. And I am very troubled by plans to allow private hunters to carry out ODFW-sanctioned killing of wolves in cases of chronic depredation or declines in elk and deer

populations. Also, the plan does not address the impact of increased wolf poaching, or include any plans for increased enforcement or penalties for illegally killing wolves.

As it's written today, the draft Wolf Plan does not adequately protect wolves or address the concerns of the majority of Oregonians who wish to see them recover. When the Commission voted to delist wolves last November, it did so with the assurance to the public that protections would remain in the wolf plan. I hope you will reject this plan as it is currently written and demand new provisions in the final plan that adhere to that promise.

Sincerely,

Ms. Pat LeBaron
2368 Amaryllis St
Medford, OR 97504-5502
(541) 951-7339
patkl@centurylink.net

Roxann B Borisch

From: Dana Furgerson <danafurgerson@gmail.com>
Sent: Thursday, May 04, 2017 2:23 PM
To: odfw.commission@state.or.us
Subject: Written Testimony on Draft Wolf Plan

Dana Furgerson
125 West 36th Ave.
Eugene, OR 97405
retired teacher

The thing that most attracted me to Oregon 40 years ago was the natural environment. Oregon has pristine mountain wilderness and a gorgeous coastline. Now we are lucky enough to once again have wolves. I hope they are here for my granddaughters to experience when they grow up.

We need to value and protect our wolf population. At roughly 112 wolves and eight confirmed breeding pairs, their future is not certain. Those numbers are too small to remove protections. In addition, wolves are predators and shouldn't be penalized for doing what comes naturally to wolves. Precautions should be taken to reduce conflict with ranchers, but not by killing wolves. Where and how cattle are allowed to graze needs to be scrutinized.

Certain parts of the draft plan concern me:

- 1) Members of the public should not be allowed to do wolf killing for the agency, no matter if they're licensed or deputized.
- 2) The relationship of wolves to the decline in ungulate populations needs to be clarified. The predation by wolves needs to be a significant factor in ungulate decline, and then all other means short of killing wolves needs to be considered before lethal methods are used. For example: where and if winter feeding stations for ungulates are used.
- 3) The use of non-lethal methods needs to be clarified and expanded. It needs to be the preferred method. Killing wolves should be the method of last resort.
- 4) The definition of chronic depredation needs to be three confirmed kills and one probable kill, and all efforts to reduce conflict need to be addressed. Again, a non-lethal strategy should be the preferred method even then.
- 5) Wildlife services should not be allowed to do investigations into suspected wolf depredations, and they should not be allowed to kill wolves.

Killing wolves disrupts pack behavior. Killing wolves throws the predator/prey relationship out of balance. Killing wolves could eliminate one or both members of a breeding pair. The wolf population in Oregon is precarious; they need our protection.

Roxann B Borisch

From: Defenders of Wildlife <ecommunications@defenders.org> on behalf of Connie Peterson <defenders@mail.defenders.org>
Sent: Friday, May 05, 2017 9:00 AM
To: Commission Chair Finley
Subject: Wolves are valuable to our ecosystem--protect them!

May 5, 2017

Commission Chair Finley

Dear Finley,

I am a native Oregonian and the granddaughter of a former rancher, and I am deeply concerned that the draft Wolf Plan does too little to protect our state's small population of wolves.

I join the majority of Oregonians who oppose hunting of wolves by private citizens when there are reportedly only 112 confirmed wolves in the State.

I understand that the draft Wolf Plan includes some hopeful developments, including the formation of a citizen advisory group, but I am uneasy about who might be on that Advisory Group, and what level of understanding of the benefits of wolves to the environment these folks would have, or what special interests will be served! I attended a "Science Pub" in Bend several months ago. This was a presentation made by a person that was not friendly to wolves but I learned in that meeting that there are over 1 million cattle in our state, and only a comparative handful of confirmed "deprivations!" I find the lowered standards for lethal removal, without any requirements for nonlethal deterrents extremely troubling!

I am sickened by plans to allow private hunters to carry out ODFW-sanctioned killing of wolves in cases of chronic depredation or declines in elk and deer populations. The draft plan does not address the impact of increased wolf poaching, or include any plans or funding for increased enforcement or penalties for illegally killing wolves.

As it's written today, the draft Wolf Plan does not adequately protect wolves or address the concerns of the majority of Oregonians who wish to see them recover. When the Commission voted to delist wolves last November, I was upset, but hoped the accompanying assurance to the public that protections would remain were accurate. The current plan does not give me confidence at all. Please reject this plan as it is currently written and insist that provisions in the final plan align with that promise.

Sincerely,

Ms. Connie Peterson
2203 NW Clearwater Dr
Bend, OR 97703-7339
(559) 284-4172
c.peterson8784@sbcglobal.net

Roxann B Borisch

From: Stephanie Christensen <steph.e.chris@gmail.com>
Sent: Friday, May 05, 2017 10:54 AM
To: odfw.commission@state.or.us
Subject: Fwd: Public comment on Wolf Management Plan Draft

----- Forwarded message -----

From: **Stephanie Christensen** <steph.e.chris@gmail.com>
Date: Fri, May 5, 2017 at 10:43 AM
Subject: Public comment on Wolf Management Plan Draft
To: Stephanie Christensen <steph.e.chris@gmail.com>

I am writing today in regards to the Wolf Management Plan Draft. As an Oregonian, I value very highly the conservation of our wildlife - and generally urge the Commission to maintain a focus of conservation and non-lethal deterrence efforts in the revised plan. Specifically, I would ask that the plan include the following points. Maintain a current defensible definition of chronic depredation as 4 qualifying incidents in 6 months that is reasonably and professionally attributed by ODFW staff to a known wolf or family of wolves.

Better definition and requirement of use of non-lethal deterrence efforts by livestock producers before consideration of killing wolves. The requirement should be that all non-lethal methods are exhausted before any killing of wildlife, and vague terms such as "good faith" should be eliminated.

Conservation of wildlife, including wolves, should be a higher priority on public lands - and there should be no compensation for missing or killed livestock on public lands where livestock is not defensible and producers knowingly place livestock in areas of known wolf presence.

Improve conflict prevention by better coordination between agencies such as the USFS & BLM so that grazing permits are not allowed in areas of known wolf presence.

ODFW and wildlife specialists should continue to be responsible for the killing of a wolf involved in verified depredation of livestock, and they should be killed in the most humane way possible. I strongly oppose using private citizens to kill wolves in this situation - because it suggests a "trophy" of sorts and sends a poor and conflicting message of getting to kill a wolf as a "prize".

And finally, and I cannot say this strongly enough, there should NEVER be licenses issued for the sport hunting or trapping of wolves in ANY phase of management. Wolves are still in recovery in Oregon, their growth was stalled more recently, and poaching has increased.

In the future, I would also like to see the ODFW Commission use a neutral facilitator to manage multi-stakeholder discussions, especially those involving future Wolf Management Plans.

Thank you,
Stephanie Christensen

Roxann B Borisch

From: ODFW Info <odfw.info@state.or.us>
Sent: Friday, May 05, 2017 4:39 PM
To: odfw.commission@state.or.us
Subject: FW: Wolf Management Plan Revision

From: Joanie Beldin [mailto:joanibldn@gmail.com]
Sent: Friday, May 05, 2017 4:13 PM
To: odfw.info@state.or.us
Subject: Wolf Management Plan Revision

May 5, 2017

Dear Chair Finley and OFW Commissioners:

Thank you for this opportunity to share my thoughts and concerns regarding the proposed Wolf Conservation and Management Plan revision.

I would like to speak to the proposal to allow public hunters to hunt and kill wolves determined to be “chronic depredators” – essentially being “deputized” to do the work of the Agency.

According to a Feb. 14th 2017 Statesman Journal article, ODFW's Michelle Dennehy stated that this would not be considered sport hunting, but rather a "controlled take". In this same article, the Director of Oregon's Hunting Association stated “Why not utilize the situation in a manner that provides a “hunting opportunity”, while also serving a management need?” An opportunity to kill wolves. I don't believe that ODFW's wolf biologist saw the killing of OR4 and his family as an "opportunity". I believe he did it as a regrettable part of his job. I believe it was done with respect for the wolves and there were no bragging rights nor did the wolves become a trophy.

Our wolves are not a prize to be won. Placed in the hands of private individuals who see it as a “hunting opportunity,” the grave act of taking the life of a targeted wolf becomes an act of “sport.” If allowed to keep the wolf, it becomes a trophy hunt. . If this proposal is adopted, please never allow the wolf/wolves to kept to become trophies.

I believe we are kidding ourselves to think private hunters will do this job in the same way or with the same mindset as an agency official. This act must remain in the hands of ODFW. It should also never be placed in the hands of Wildlife Services

Providing public citizens the coordinates they will need to find the wolves is very concerning. To date the public has never been privy to this information. Our wolves' greatest protection is their secrecy from humans. They are notoriously hard to find. This information can easily spread to others – intentionally or unintentionally. This could include potential poachers. There would be no way to control this.

Trapping should be off the table as a potential method. It is not only cruel and inhumane, but it is indiscriminate - not a method for catching a targeted animal.

I find this proposal to be totally inappropriate, distasteful and disrespectful. I fear it will crack open the Pandora's box to wolf hunting - ultimately feeding those hunters itching for their license to kill a wolf. We need to rise above the example set in other states. We can do better for our valuable keystone population of wolves who are vital to our landscape. There is no place or need in Oregon for public wolf hunting, for any reason and under any name.

Thank you for your consideration.

Sincerely,
Joan Beldin
10223 N. Hudson St. Portland, Oregon 97203

Roxann B Borisch

From: Admin <schauerbj@comcast.net>
Sent: Saturday, May 06, 2017 10:42 AM
To: odfw.commission@state.or.us
Subject: Oregon Wolf Plan

Please do everything you can to protect Oregon's wolves.

Thank you.

Diane Schauer

Roxann B Borisch

From: nancy shinn <nancyshi123nn@gmail.com>
Sent: Sunday, May 07, 2017 8:26 AM
To: odfw.commission@state.or.us
Subject: wolf recovery plan

Dear Chair Finley and Commissioners:

My husband and I strongly encourage you to support strengthened protections for wolves through the five-year review process of the Oregon Wolf Plan.

Wolf recovery in Oregon has been a success thus far, and strengthening Oregon's plan will ensure this continues.

Specifically, we request that the Department remain in charge of depredation investigations. These critical investigations need to be unbiased and based upon clear evidence. Wildlife Services has shown in the past it is not capable of this job. In fact, they pay people to kill wolves.

Additionally, we also oppose killing wolves in response to conflicts with deer and elk. Wolves are wild animals, and ungulates are their natural prey. If we kill wolves due to conflict with ungulates, we are shortchanging recovery.

Please also maintain provisions that require non-lethal measures be used to deter wolf-livestock conflict prior to any lethal control being used. This provides clarity to the public and livestock community around what is required and what is most effective to deter conflict. These preventative measures are critical for wolves, and should not be weakened now.

And, most importantly we do not support a wolf-hunting season now or at any point in the future. This type of management is inappropriate for wolves, especially given the importance of maintaining pack structure. IF you ruin pack structure you cannot control the behavior or hunting habits and your measure of maintenance is ruined.

Thank you for considering our comments during the five-year review process.
Sincerely, George and Nancy Shinn, 1044 Pirates Court, Coos Bay, Oregon 97420

Roxann B Borisch

From: Defenders of Wildlife <ecommunications@defenders.org> on behalf of Julianne Ramaker <defenders@mail.defenders.org>
Sent: Sunday, May 07, 2017 11:41 AM
To: Commission Chair Finley
Subject: Our Wolf Families Need PROTECTION especially from private hunters!

May 7, 2017

Commission Chair Finley

Dear Finley,

I am an Oregonian, and I am deeply concerned that the draft Wolf Plan does too little to protect our state's small population of wolves. This is very troubling in light of the 2016 annual wolf report, which showed a decline in packs and breeding pairs. I am adamantly opposed to any hunting of wolves by private citizens when there are so few wolves in Oregon. This proposal is yet another step backward since the Fish and Wildlife Commission voted to delist wolves from state protection. With only 112 confirmed wolves in the state, the Commission should be focused on protecting wolves and not prematurely decreasing protections.

I appreciate that the draft Wolf Plan includes some promising developments, including the formation of a citizen advisory group, which seems long overdue, and clarification about how the agency will respond to population declines. However, there are several proposals in the draft plan that could undermine wolf recovery in Oregon.

I am worried about the lowered standards for lethal removal, without any requirements for nonlethal deterrents. And I am very troubled by plans to allow private hunters to carry out ODFW-sanctioned killing of wolves in cases of chronic depredation or declines in elk and deer populations. Also, the plan does not address the impact of increased wolf poaching, or include any plans for increased enforcement or penalties for illegally killing wolves.

As it's written today, the draft Wolf Plan does not adequately protect wolves or address the concerns of the majority of Oregonians who wish to see them recover. When the Commission voted to delist wolves last November, it did so with the assurance to the public that protections would remain in the wolf plan. I hope you will reject this plan as it is currently written and demand new provisions in the final plan that adhere to that promise.

Sincerely,

Roxann B Borisch

From: Cristy Murray <doglady8@gmail.com>
Sent: Sunday, May 07, 2017 11:46 AM
To: odfw.commission@state.or.us
Subject: Protect Oregon's wolves

I've recently become aware that Oregon is revising our wolf recovery plan. This is an issue of utmost importance to me and I want to express my concerns about some of the changes in the plan. Specifically, I don't believe it's a good idea to allow citizens to hunt wolves. I am certain this will lead to disaster for a population that has plateaued. Such an important predator needs to be protected, not vilified. Based on information from leading wolf scientists, I would like to submit the following:

I'm writing to advocate for specific priorities in the revision of Oregon's Wolf Conservation and Management Plan. Wolves often bear the brunt of special-interest politics -- but the state's wolves belong to all Oregonians, not just those who find it inconvenient to live with big wildlife. The department's 2016 annual wolf report shows a population increase of just two wolves since 2015 and a decrease in packs and breeding pairs. This concerns me greatly and highlights the need to increase protections under the wolf plan.

The science comparing lethal and nonlethal methods of conflict deterrence has also shown that nonlethal measures are more effective and less costly over the long haul than simply killing wolves and other native predators. Revisions to Oregon's wolf plan should acknowledge this science and shift the plan away from killing wolves.

I urge you to focus on the following five areas when making revisions:

1) The plan should maintain a wolf-conservation focus and should not make wolves a scapegoat for declines in elk or deer. The current plan says wolves can be killed if they are "the cause" for wild ungulate declines; the proposed revisions say wolves need only be "a significant factor." This greatly reduces protections for wolves. Also, the proposed plan allows wolves to be killed if they cause elk herds to decline at artificial elk-feeding stations. Those stations bait wolves in, and it's outrageous that the state would kill wolves for being drawn to a natural prey species.

2) The revised plan should preserve those parts from Phase I that have proved beneficial for all parties and include them in Phase II and III. This includes clarity, transparency, accountability and enforceable requirements for the department and livestock operators before killing wolves can be considered.

3) No hunting or trapping of wolves should be allowed in Oregon, except for live trapping by state or federal biologists to fasten collars. Most Oregonians don't want wolves killed, since

current science shows that killing wolves increases the risk for conflict, reduces social tolerance for wolves, and increases poaching. But especially, wolves shouldn't be hunted or trapped by members of the public -- it incentivizes conflict, is ripe for abuse, and is a "foot in the door" for general wolf hunting and trapping seasons.

4) The threshold for considering killing wolves for chronic livestock depredations should be higher on public lands than on private lands. The state holds wolves as a public trust and should not be killing our wolves on public lands to benefit a private, for-profit industry that uses these lands at a tremendous discount and is eligible for compensation for wolf-caused losses.

5) Finally, the plan should not count "probable" wolf-caused losses toward a wolf-kill order since there's no scientific evidence it will result in fewer conflicts; it shouldn't allow USDA's Wildlife Services to be involved in wolf-depredation investigations since this rogue agency routinely confirms depredations when the department did not find sufficient evidence; it shouldn't allow involvement of local elected officials in making depredation decisions because such consequential decisions should be divorced from local politics, pressure and personal relationships; and the plan should not create management zones and wolf population caps when it's well known that wolves are self-regulating.

Thank you for carefully considering my input.

Cristy Murray
17980 S Redland Rd
Oregon City, OR
97045

Roxann B Borisch

From: ODFW Commission
Subject: FW: Wolf Management Plan

From: Joanie Beldin [mailto:joanibldn@gmail.com]
Sent: Monday, May 08, 2017 11:58 AM
To: odfw.commission@state.or.us
Subject: Wolf Management Plan

May 8, 2017

Dear Chair Finley and ODFW Commissioners:

Thank you for this opportunity to share my thoughts and concerns regarding the proposed Wolf Conservation and Management Plan revision.

I am deeply concerned that the draft Wolf Plan does too little to protect our state's small population of wolves. I would like to share the following thoughts and concerns:

1. Our wolf population has stalled - When our wolves were delisted in November 2015, we were assured by the state biologists that science indicated that wolves would continue to grow more numerous under the protections of the Wolf Plan and would continue to receive the protection they would need in order for them to continue to recover.

In the summer of 2016, ODFW was predicting a wolf population of 150. These predictions were based on a continued steady population increase. Nobody predicted the population stalling that occurred when the Dec. 2016 count was revealed. Only 1 ½ years after the delisting, our wolf population increased by only two wolves and breeding pairs decreased by over 25%. Clearly, things did not go as expected. Yet the proposed Draft Plan is moving forward as if the population is following the past trajectory.

When Phase 3 was designed, it was assumed that a wolf population of 7 breeding pair would be large and stable enough to withstand a lessening of their protections. This is an assumption that was formulated in 2005, before there were wolves in our state. At that time it was a theory and it was a political compromise. We now know the reality of the situation. There are only about 103 wolves in eastern Oregon being managed under Phase 3. This is not a stable population that can withstand a lessening of protections.

Our wolves were prematurely delisted and they are not thriving as promised. I ask that we not prematurely decrease their protections just because Phase 3 says we can. Rather, we need to be flexible and to take pause and focus on giving them the protections they need in order to recover.

2. The proposed definition for “chronic depredation” - The definition of “chronic”, according to the English Oxford Dictionary, describes behavior which “persists for a long time or is constantly recurring”.

In 2016 in eastern Oregon, the Shamrock pack had three confirmed depredations - one in May, one in June and one in November. This pack continued to prey on their preferred natural prey the vast majority of the time. They did not habituate to livestock. Their depredation behavior was not chronic – it was not persistent nor did it constantly recur. Yet, under the proposed definition of chronic depredation, some or all of the wolves in a pack that depredates as this one did could be killed.

While this definition could meet the low tolerance level of the ranching community and the desire to make it easier to kill wolves, it is not a definition that is fair to the wolves. It does not describe chronic behavior on the part of the wolves. In my opinion, three depredations in a year's time is more descriptive of "occasional" depredating behavior.

A wild wolf's average life expectancy is five to seven years. Disease, weather, poaching, starvation, their prey, rival packs and "controlled take" are all fatal to them. It is possible that some of our wolves will succumb to parvovirus titers. I fear that our wolf population will not be able to withstand the increased kills that will come from the low tolerance represented by the proposed chronic depredation definition.

I suggest that we go forward with a more cautious approach. These wolves may be in Phase 3, but their population is far from recovered. I suggest increasing the level of tolerance. I suggest that the Phase 1 definition of chronic depredation be extended to Phase 3. This comes closer to defining chronic behavior and would help meet ODFW's goal of wolf conservation.

"Probable depredation", defined as "lacking sufficient evidence to clearly confirm predation by a particular species" should *never* count towards lethal take. Presumed guilty without proof is not acceptable.

3. Requirement for non-lethal measures - Conflict prevention needs to be at the core of this Plan. The Plan states that there will be a continued emphasis in Phase 3 on the use of non-lethal deterrents. This sounds good, but it is empty rhetoric without any well defined requirements and expectations.

It's important that the Draft Plan replaces ambiguity with clearly laid out requirements and expectations regarding non-lethal measures that must be taken before lethal take can be considered. Those expectations should require that all feasible non-lethal measures be exhausted before lethal take can be considered.

As you are aware, when it comes to wildlife management, one size does not fit all. Each species is unique and requires a plan that matches their specific behavior traits. Because of the wolves' highly advanced social relationships, lethal take can backfire and therefore is not necessarily the best answer to depredation. It disrupts the family structure and often leaves unskilled juveniles without their adult mentors. These wolves are more prone to depredating behaviors. Non-lethal measures when strategically used can have great success in preventing livestock depredation.

As it is written today, the draft Wolf Plan does not adequately protect wolves or address the concerns of the majority of Oregonians who wish to see them recover. When the Commission voted to delist wolves last November, it did so with the assurance to the public that protections would remain in the wolf plan. I hope you will reject this plan as it is currently written and demand new provisions in the final plan that adhere to that promise.

Thank you for your consideration.

Sincerely,

Joan Beldin
10223 N. Hudson St. Portland, Oregon 97203

Roxann B Borisch

From: reffourn georgette <reffourngeorgette@outlook.COM>
Sent: Monday, May 08, 2017 12:01 PM
To: odfw.commission@state.or.us

Chair Finley & Commissioners,

I was troubled to see that Oregon's wolf recovery seems to have stalled out in 2016. Along with recent decreases in protections and the expiration of important enforceable provisions in the state's wolf plan, conflict increased - as science indicated it likely would.

As you consider long-awaited revisions to the Oregon Wolf Plan, please ensure the plan prioritizes conservation, education, and conflict prevention. Killing wolves does not resolve conflict and should truly be an option of last resort.

The revised Wolf Plan should learn from the past by carrying forward parts of the plan that worked in previous phases and fixing those that did not. To succeed, the plan must contain clear, defensible, and enforceable requirements. For instance, the definition of chronic depredation and enforceable requirements for non-lethal measures and transparency should be no less than they were prior to 2015 when the wolf population grew and conflict decreased.

It's also important to remember that as Commissioners, you serve all Oregonians. The majority of Oregonians value native wildlife for their intrinsic value and strongly oppose wolf hunting by any name. Existing provisions in the plan that allow wolf hunting and trapping should be removed.

Oregon's wolf recovery remains tenuous. Wolves play an important role on the landscape and have many positive benefits. Oregon can - and should - do better than neighboring states that have shown killing wolves only increases conflict.

Please consider the voices of all Oregonians.

Thank you.

Ms. reffourn georgette
rue des serruiers bat B
nice, OR 06300

Roxann B Borisch

From: Susan Doverspike <doverspike@hotchkisscompany.com>
Sent: Tuesday, May 09, 2017 6:04 AM
To: Chair Michael Finley
Subject: Comments on Oregon Wolf Plan Revision

Dear Chair Finley,

I am an Oregon livestock producer, and I am writing to comment on the recently released draft of the Oregon Wolf Conservation and Management Plan.

I am concerned about ODFW's decision to increase the depredation threshold in Phase II and Phase III from two confirmed depredations to three confirmed depredations before lethal take is considered. I care deeply about my livestock, I do not want to have to wait for more of my livestock to be killed by wolves before the Department is authorized to consider lethal take. I believe that the Department has the expertise and experience to know when lethal take is appropriate in a given area, and I would like to see the Plan move back to the original threshold to give the Department discretion to decide when to move to lethal take. While I appreciate being able to count probable depredations toward a decision to move to lethal take, the number of probables in the draft plan is much too high. I would like to see two probable depredations equal one confirmed, which would enable the Department to move to lethal take after one confirmed and two probable depredations. This would give the Department the ability to decide when to move to lethal control, and avoid making producers wait for more of their livestock to be killed when there is a known problem wolf in the area.

I would also like to see greater local control in confirming depredations. The plan revisions allow depredation determinations to be made by either ODFW or USDA Wildlife Services in Phase III. I think ODFW should allow their local field biologist, local law enforcement, or USDA Wildlife Services to make depredation determinations in their local area. I am aware that sometimes it has taken ODFW several days to make a depredation decision in some instances, and that the ultimate decision is often made outside the local field office. As wolf populations continue to expand and increase, this process is far too time consuming and resource intensive. Depredation determinations need to be made locally.

I would also really like to see the plan discuss and plan for setting population objectives for wolves. For most other species, the Department has a sense of the habitat carry capacity and uses that information to set population objectives. I worry that without setting population objectives for wolves, we will not be able to tell when wolves have reached their natural carrying capacity and are turning to livestock as a primary source of food. We need to ensure that wolves in Oregon are managed to the natural carrying capacity, and do not exceed the

capacity in a way that will increase the burden on livestock producers. To that end, ODFW should modify the Plan to create wolf management areas or zones with set population objectives within each zone.

Additionally, I am very invested in making sure that ODFW does not move away from collaring wolves as a primary method to track wolves across all phases. In much of Oregon, the vast majority of wolf habitat will be on private land which is also used for livestock and crop production. Livestock producers need to know when wolves are in their area so that they can try to manage to avoid conflict. Additionally, we need an increased focus on collaring to help ensure that the Department is getting accurate information on wolf location and dispersal for their counts. I would like to see ODFW collar at least 50% of the wolf packs, with a priority around packs that are likely to have conflict with livestock. I think ODFW should consider partnering with local governments, industry groups, and others to help ensure that we have funding for this important task.

Finally, for producers west of Highway 395, I think that ODFW should work with USFWS to help ensure that federally listed wolves in Oregon are treated similarly to federally delisted wolves. This should include support for federal delisting and working with USFWS to develop necessary plans and permits to ensure equal management across the state until delisting occurs.

Thank you for the opportunity to comment on the draft Wolf Conservation and Management Plan revisions. Oregon livestock producers have been integral in helping ensure wolf populations around the state are continuing to grow. However, I am concerned about increased impacts on my operation as populations continue to grow. I hope you'll consider my feedback as you look toward Plan revisions.

Sincerely,

Susan Doverspike
30552 Hotchkiss Ln
Burns, OR 97720
doverspike@hotchkisscompany.com

Roxann B Borisch

From: Defenders of Wildlife <ecommunications@defenders.org> on behalf of Christine LeBlanc <defenders@mail.defenders.org>
Sent: Tuesday, May 09, 2017 8:16 PM
To: Commission Chair Finley
Subject: Maintain Protection on Wolves

May 9, 2017

Commission Chair Finley

Dear Finley,

Please strengthen the wolf protection plan. There is no need to resort to lethal killing of wolves with such a small population of just over 100 animals in the State of Oregon. Private hunters should not be allowed to kill wolves. Unfortunately, there are too many people who prefer to kill any wolf they see. We should strive to be a civilized society and use nonlethal means if an issue arises with a wolf or wolves in a specific area.

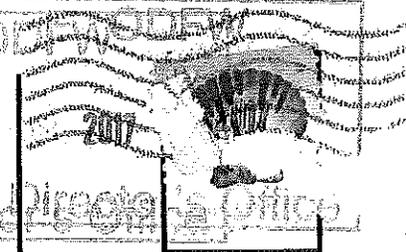
Sincerely,

Mrs. Christine LeBlanc
1110 SW 160th Ave
Unit 103
Beaverton, OR 97006-5120
(503) 816-5859
leblancnatashabr@yahoo.com

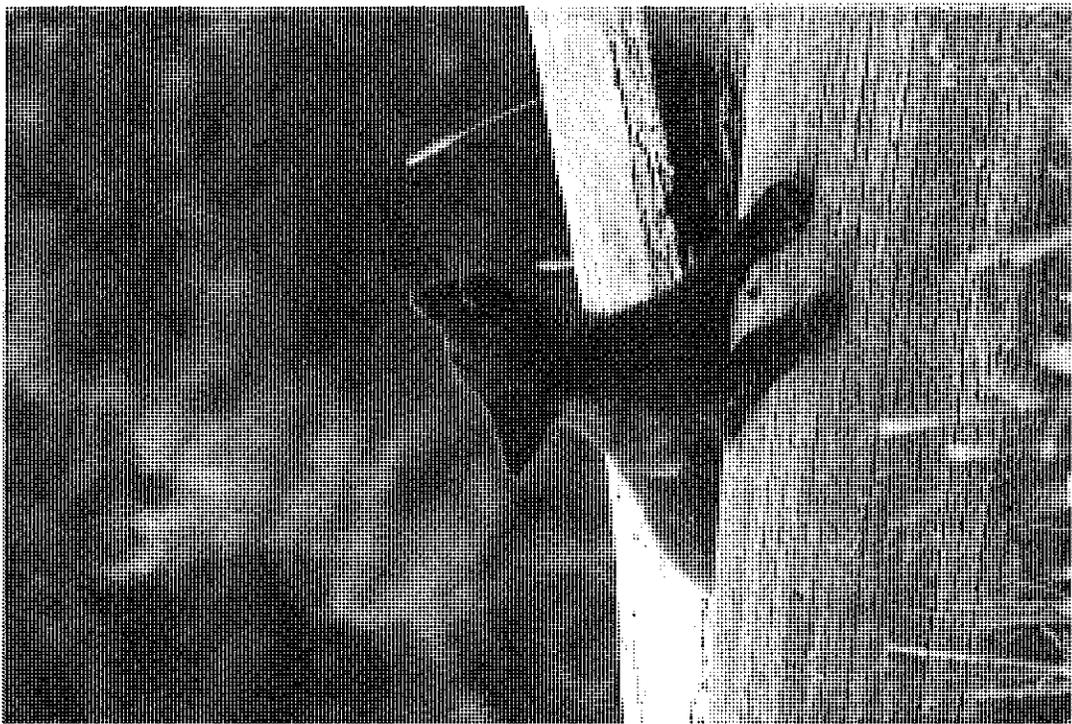
5/9/17
RE: OREGON WOLF POPULATION
MANAGEMENT PLAN
TO WHOM IT CONCERNS:

I AM IN FAVOR OF A
MAXIMUM WOLF POPULATION
THROUGHOUT THE STATE, AS
WELL AS MAXIMUM COMPENSATION
FOR LOSSES TO LIVESTOCK OWNERS
BASED ON WOLF KILLS.

SINCERELY,
RICHARD JENSEN
PO BOX 1017
TALENT, OR 97150
rik.jensen@gmail.com
K's Wild



DEPT of FISH &
WILDLIFE
OR WOLF MGT
4034 FAIRVIEW, IN.
SALEM, OR DR SE
97302
PHONE: OR Dept Fish and Wildlife



Roxann B Borisch

From: Marknofziger <Marknofziger@yahoo.com>
Sent: Tuesday, May 09, 2017 9:03 PM
To: odfw.commission@state.or.us
Subject: Wolf plan

Please manage wolfs and give our elk and deer herds relief we are really starting to notice the devastation they can cause

Sent from the Samsung Galaxy Rugby Pro, an AT&T LTE smartphone

Roxann B Borisch

From: Laura Cleland <lcleland@oregoncounties.org>
Sent: Wednesday, May 10, 2017 3:20 PM
To: odfw.commission@state.or.us
Cc: Gil Riddell
Subject: Comments on the Oregon Wolf Conservation and Management Plan Draft
Attachments: plcWolfConservPlanprinciples5-17.docx.pdf

Please see the attached letter from the Association of Oregon Counties.

Thank you,

Laura

--

Laura Cleland
Communications & Operations Director
Association of Oregon Counties
503-585-8351 office
503-887-7698 cell

May 10, 2017

State Fish & Wildlife Commission
State Department of Fish & Wildlife

Via: *odfw.commission@state.or.us*

Subject: Comments on the Oregon Wolf Conservation and Management Plan (Draft, April 2017).

Dear State Fish & Wildlife Commission and Department:

The Association of Oregon Counties represents all 36 county governments, with wide diversities of opinion on public policy matters. Our members collectively have jurisdiction over the entire state, along with close relationships to the people and events that come with being local governments.

AOC respectfully offers as our initial set of comments on the April 17, 2017, Draft Oregon Wolf Conservation and Management Plan the following principles to guide the Commission and Department in its revision by rulemaking of the Plan. More specific comments will be provided during the comment periods required by rulemaking.

PRINCIPLES FOR REVISION OF THE OREGON WOLF CONSERVATION AND MANAGEMENT PLAN

- Local Control
 1. Quicker calls about depredations made in the field due to more agents qualified by the Department of Fish & Wildlife, including ODFW staff, staff of USDA Wildlife Services, Oregon State Police troopers, and the county sheriff and deputies.
 2. Make decisions locally for non-lethal and lethal actions by qualified agents to facilitate timely and swift determinations about depredations.
 3. Open a website of information on location and travel of wolves based on collar transmissions, and give access to livestock owners, range riders, and qualified agents. This will strengthen relationships among ODFW and the people they serve.

- Management Units
 1. Establish management units so that an over-population of wolves does not occur in any one area.
 2. Establish numbers of wolves as a management objective, for each unit, with

consideration given for wildlife populations and wolf-livestock conflicts.

- Collaring
 1. Collaring is the main tool for nearly all non-lethal activities related to wolf-livestock conflicts. It provides the best knowledge of wolf locations and time, helping to prevent depredations.
 2. Collaring will remain important to track populations and disbursement of wolves into western Oregon, where counting populations will be a challenge.
 3. Collaring enhances communication among livestock producers and ODFW, which is critical for social tolerance within the livestock community.

Thank you for this opportunity to comment.

Sincerely,

A handwritten signature in black ink that reads "Bill Hall". The signature is written in a cursive, slightly slanted style.

Bill Hall
President, Association of Oregon Counties
Commissioner, Lincoln County

Roxann B Borisch

From: s m <cocopucks@gmail.com>
Sent: Wednesday, May 10, 2017 5:00 PM
To: odfw.commission@state.or.us
Subject: Oregon Wolf Plan

To Whom It May Concern,

Wolves and other animals should not be treated as disposable beings. Please look at other apex predator management efforts in the USA and around the world that allow the successful sharing of the world. Please explain the reasoning for allowing the hunt of any creature for fun and not for food. Wolves are on the brink of extinction and every action to allow people to hunt for pleasure brings them that much closer. If you don't personally care for other animals please understand that you are being short sighted by killing them as it seems as money and industry backers are the impetus for not protecting humans, other animals and the environment. The original people of this land and dare I say any land have all been able to live successfully with other animals. I have to wonder why some groups never seem to be able to follow the same path.

Concerned Citizen

--
reduce, reuse, recycle

Roxann B Borisch

From: Lee Rockwell <leerockwell0@gmail.com>
Sent: Thursday, May 11, 2017 3:08 PM
To: ODFW Commission
Subject: Re: Thank you for your comments

On Fri, Nov 6, 2015 at 11:06 AM 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.

I

I wish I could donate to more Earth friendly (with wolves my prary concern) used the live in Sisyoun Northern CA ... I believe I am member of Oregon Wild & am all too familiar with the state of Oregons' disparities! Just sent \$ to Earthjustice (because Earth needs a lawyer) now more that ever!

I am connected with the Center For Biological Diversity which I is Also next on my list ... (I'm paid up KPFR for worldwide 'true news") live & archived listener sponsored and free! I call my inbox the "save the everything" box... and that's just what we need NOW! Thanx for all your hard work!!! Sincerely & with love always

🌿🐾😊🏠🎵🌿📧👍🏠🌿❤📧 Lee Rockwell

Roxann B Borisch

From: Christine Haynie <christineh1@charter.net>
Sent: Thursday, May 11, 2017 4:34 PM
To: ODFW.Commission@state.or.us
Subject: Comment on Wolf Conservation and Management Plan Review

I am a citizen of Medford, Oregon and I attended the meeting in Klamath Falls on April 21 regarding the above. I submit my written testimony ahead of the meeting scheduled for May 19, per your instructions.

To Members of the Commission:

There are several areas of concern in the proposed changes to the current wolf plan. I urge the commission to refrain from adopting any new rules that would increase the number of wolves killed. One can hardly postulate that wolves have moved from Phase 1 to Phase 2 or 3 at any level. With only 112 wolves in the state and only 8 breeding pairs, we are a long way from having a successful reentry into Oregon of this important species.

- Wild Life Services should not be investigating. They have a horrible record of over confirmed depredations and have shown they are more interested in killing animals than ensuring they are adequately protected according to guidelines
- Public permits to hunt wolves should never be allowed, period. We cannot revert to the barbaric practices of the past in serving these animals up to satiate the killing appetites of unenlightened human beings.
- It is ludicrous to hold wolves accountable for ungulate killing. They have to eat. They will go where the food is. Better they play their important role in promoting healthy ecosystems by keeping ungulate populations healthy and at sustainable numbers. Killing wolves so hunters can have more to themselves is just another barbaric notion that a serious conservation program cannot afford to embrace.
- The guideline non lethal methods "reasonable for the situation" needs to be identified clearly. There needs to be much more focus on non-lethal.

In sum, I urge the Commission to continue on its path of focusing on conserving and increasing the number of wolves in Oregon. I know the cattlemen and hunting lobby is strong with lots of friends in the government. They cannot be allowed to dictate draconian measures that would gut the intent of the people of Oregon who want wolves to be a thriving part of our natural world.

Thank you for your consideration

Christine Haynie
940 Washburn LN
Medford, OR 97501
541.773.1680
christineh1@charter.net

Roxann B Borisch

From: fatiesnoop@gmail.com
Sent: Thursday, May 11, 2017 5:37 PM
To: odfw.commission@state.or.us
Subject: Oregon Wolf Plan

Please let the wolves live out their lives in peace and freedom. They are a part of the family of life as are all living beings and they have every right to be here. Without their balance the harmony that nature is will be destroyed and so will we.

Cindy Kreiman

Roxann B Borisch

From: Jennifer Spring <spring.jenni@gmail.com>
Sent: Friday, May 12, 2017 12:11 PM
To: odfw.commission@state.or.us
Subject: No wolf hunting or "wildlife services" involvement in investigations.

Dear Chair Finley and Commissioners:

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

Specifically, I request that the Department remain in charge of depredation investigations. These critical investigations need to be unbiased and based upon clear evidence. Wildlife Services has shown in the past it is not capable of this job.

Additionally, I also oppose killing wolves in response to conflicts with deer and elk. Wolves are wild animals, and ungulates are their natural prey. If we kill wolves due to conflict with ungulates, we are shortchanging recovery.

I also encourage the Commission to maintain provisions that require non-lethal measures be used to deter wolf-livestock conflict prior to any lethal control being used. This provides clarity to the public and livestock community around what is required and what is most effective to deter conflict. These preventative measures are critical for wolves, and should not be weakened now.

As a final point, I do not support a wolf-hunting season now or at any point in the future. This type of management is inappropriate for wolves, especially given the importance of maintaining pack structure.

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

Sincerely,

Jennifer Spring
1989 Linwood St NW
Salem, OR 97304

Roxann B Borisch

From: Lynne <lkogut@mydfn.net>
Sent: Saturday, May 13, 2017 9:43 AM
To: odfw.commission@state.or.us
Subject: Protect the wolves of Oregon May 19, 2017 meeting of commissioners

Dear Commissioners,

My name is Lynne Ann Kogut and I live in Roseburg, Oregon. I am asking you to protect the wild and the wilderness of Oregon and that includes the predators called wolves. They are essential to the balance of life in the wild. Science has proven this and the data is clear. Wolves are necessary and they need a viable community to keep the gene pool clean.

When we mess with the family units and the diversity within the gene pool, more problems than solutions occur.

When allowed to thrive, wolves create a greater balance and diversity in the whole ecosystem and that has been proven as well.

Please make your decisions based on science. The data does not lie. Please protect our wild brothers and sisters, the wolves. They deserve our protection. There are non-lethal ways to work around any handicap experienced by ranchers and farmers. All businesses do have losses and there are viable alternatives to killing. Guard dogs are just one of the solutions. Lets be intelligent around protecting wildlife and all life.

Thank you.

Lynne Ann Kogut

Roxann B Borisch

From: Vera Stewart <verastewart1@yahoo.com>
Sent: Saturday, May 13, 2017 10:40 AM
To: odfw.commission@state.or.us
Subject: Oregon Wolf Plan

Please don't kill the wolves? My sixth grade teacher read to our class the book, "White Fang" I have loved wolves ever since that time.

There can be a way to balance the livestock and wolves.

Thank you,
Vera Stewart

Sent from Yahoo Mail on Android

Roxann B Borisch

From: Cindy and Carl Darnell <grokingthefullness@gmail.com>
Sent: Sunday, May 14, 2017 9:07 AM
To: odfw.commission@state.or.us
Subject: Wolf Management Plan Review

I am a citizen of Medford, Oregon and I am submitting my written testimony ahead of the meeting scheduled for May 19, per your instructions.

To Members of the Commission:

I am concerned about proposed changes to the current wolf plan. I urge the commission to refrain from adopting any new rules that would increase the number of wolves killed. There are only 112 wolves in the state and only 8 breeding pairs, so the successful reentry into Oregon of this important species is far from accomplished. There is no evidence that wolves have successfully moved out of Phase I of their recovery.

- Wild Life Services has a horrible record of over confirmed depredations and have shown they are more interested in killing animals than ensuring they are adequately protected according to guidelines
- Public permits to hunt wolves should never be allowed. Period. We cannot revert to the barbaric practices of the past to satisfy hunting lust.
- It is ludicrous to hold wolves accountable for ungulate killing. They have to eat. They will go where the food is. Better they play their important role in promoting healthy ecosystems by keeping ungulate populations healthy and at sustainable numbers. Killing wolves so hunters can have more to themselves is just another barbaric notion that a serious conservation program cannot afford to embrace.
- The guideline non lethal methods "reasonable for the situation" needs to be identified clearly. There needs to be much more focus on non-lethal methods.

In sum, I urge the Commission to continue on its path of focusing on conserving and increasing the number of wolves in Oregon. I know the cattlemen and hunting lobby is strong with lots of friends in the government. They cannot be allowed to dictate draconian measures that would gut the intent of the people of Oregon who want wolves to be a thriving part of our natural world. My mother was a strong advocate for wolves during her lifetime and I have inherited a deep interest in seeing that the progress that has been made so far in wolf recovery continues. There are effective means protect livestock, and as far as I know, cattle and sheep are not endangered or threatened. Please continue to ensure that wolves are allowed to continue their recovery in Oregon.

Thank you.

Carl Darnell
309 Havana Avenue
Medford, OR 97504

Roxann B Borisch

From: Jabrila <jabrila@wintergreenfarm.com>
Sent: Sunday, May 14, 2017 11:49 AM
To: Commission Odfw
Subject: Public Comment on Review of Wolf Management Plan

Good Day,

My name is Jabrila Via and I would like to officially submit this comment into the public record regarding the review of the Wolf Conservation and Management Plan.

I have been farming and raising cattle for nearly 40 years in Oregon. I support the recovery of wolves because they are a part of the environment, they belong here. We need to bring the ecosystem back to the state where all parts are alive and flourishing, living together in a balanced healthy system.

Killing wolves does not resolve conflict. I oppose any efforts to weaken the Wolf Conservation and Management Plan. There needs to be more emphasis put on education and systems for non-lethal deterrence and less on making it easier for wolf killing.

The return of the wolves into Oregon and their increasing numbers is a positive step and should not create a roll back of protection. The return of wolves is a good direction toward the healing of our ecosystem. The time is now to foster this healing as much damage has been done to the environment. We need to consider what condition we will be leaving the earth for our children and their children's children.

I urge you to honor your mission to protect and enhance Oregon's fish and wildlife for the present and future generations. Thank you for your time I hope you will consider my thoughts and recommendations.

Jabrila Via
89846 Poodle Creek Rd.
Noti, Ore. 97461

Sent from my iPad.

Roxann B Borisch

From: ODFW Info <odfw.info@state.or.us>
Sent: Monday, May 15, 2017 2:53 PM
To: odfw.commission@state.or.us
Subject: FW: Wolf Program

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

From: Seacliff [mailto:seacliff4@gmail.com]
Sent: Monday, May 15, 2017 2:26 PM
To: odfw.info@state.or.us
Subject: Wolf Program

I am opposed to opening a season on Oregon's wolves.
As a retired wildlife biologist I feel the population is way to small.
Please enter my comments into the official record.

Barrett Edgar
PO Box 210
Wedderburn OR 97491

Sent from my iPhone

To Whom It May Concern:

May 2017

RE: Wolf recovery in Oregon

Thank you for taking the time to read my letter and consider my point of view. Due to my work schedule, I'm unable to attend the meeting in person, but I believe it's important that I contribute to this issue.

I've followed the wolf recovery efforts with interest for many years. I'm disappointed with how often humans "take out" a species, and then realize the damage they've done. Balance is the key to success for so many things, and the wolf issue has polarized so many.

As the human population grows, maintaining wild spaces and a balance in nature becomes especially important. Having wolves as a part of the wilderness landscape is key to success and achieving a healthy natural balance. Emotions and special interests on either side of the wolf issue are not the balance needed to make a scientific, biological, economical and sound decisions related to this issue. Input should be considered equally, with a large added dose of common sense. A wilderness of only wolves wouldn't work, and conversely, experience and research has shown us that the balance of nature requires wolves.

Additionally, regarding balance, the wolf plan in Oregon allows Wildlife Services to conduct investigations regarding livestock and possible wolf depredation. While this agency is surrounded by controversy, it also seems to be generally agreed upon that they are quite lenient about killing animals. At the very least, balance a depredation investigation team with members of both sides of the special interest wolf issue. Clear cut definitions, and provable standards must be implemented. Full transparency regarding these investigations will help build trust and credibility for all interested in these issues.

With that being said, it's assumed there will be a continued and viable presence of healthy wolves in the Oregon landscape. However, my understanding of wolf pack dynamics is that if a member of the pack is removed, the entire pack suffers. If a leader or breeding member of the pack is removed, the survivability of the entire pack becomes questionable. If the pack is defined as something as small as 4 members; and there are currently only 8 breeding pairs in Oregon, it is reasonable to assume that Oregon's population is still quite fragile. Wolves being removed from the endangered species list adds an additional challenge. Combined with wolves being poached/hunted/trapped, natural disease or injury, lethal removal/controlled take, and pup mortality rates -- this is not a strong case for the stability of wolf recovery in Oregon as it stands now. Hopefully ODFW will continue to seek a balanced approach to deal with this issue. Recognizing the value of wilderness and a balance in nature, and taking all measures possible to achieve and maintain that balance, is paramount to the good stewardship or our resources in Oregon.

It would be great if we do not repeat the mistakes of the past. We are on a path toward recovery and achieving a more balanced Oregon wilderness. Thank you for your efforts, and please do not make a decision that impedes that path.

Sincerely,

Kim

"Extinction is the more irreversible and tragic of all environmental calamities."

- Michael Soule' – American Conservation Biologist

April 2017 Oregon Wolf Conservation and Management Plan Draft comments

Self introduction: Through several positions at Yellowstone National Park, I was involved in drafting two editions of *Wolves for Yellowstone?* (1990 and 1992), and the 1994 wolf reintroduction EIS. I was the park's principal public educator on wolves and their recovery from 1985 to 1997, when I retired. Then I taught field courses on wolves for the Yellowstone Association Institute through 2005. I am a board member of the Wolf Recovery Foundation, an advisory board member of *Living With Wolves*, and a member of the Montana Fish, Wildlife and Parks Region 3 Citizens' Advisory Committee. I am a member of numerous conservation NGOs, but I do not claim to speak for any of them.

A general comment: I am pleased to see that ODFW has drafted a quite thorough plan for conserving and managing wolves. Since ODFW is now conducting a mandatory 5-year review and update of the plan, I am submitting the following comments to provide information I believe essential for inclusion and consideration as part of the plan's updates, to improve the plan's currency on key scientific conclusions and on-the-ground facts.

I note that the references cited nearly all postdate wolf reintroduction in Yellowstone and central Idaho. It is appropriate for Oregon to take advantage of the huge increase in knowledge about wolves and their effects that has resulted from two decades of wolf presence in the three-state area of Idaho, Montana, and Wyoming.

In the 400 or so talks I gave on wolf recovery in Yellowstone, the main objective I emphasized was to restore ecosystem integrity - wholeness. I believe science-based species conservation and management cannot be achieved by focusing on a species in a vacuum but, instead, is best achieved by encompassing also the habitat on which the species depends and other species of animal and plant life with which it interacts in that habitat. You may detect that bias in the remarks that follow.

Plan, P. 4. I hope the initial conservation objective of 4 breeding pairs for 3 consecutive years is well understood by concerned parties as a first step, not as a cap, and that the 7 breeding pairs referred to on P. 15 also is not a cap threshold. Perhaps it is worth highlighting that idea on P. 4. I suggest this because federal managers have been hammered repeatedly by critics, saying that they "raised the bar" for recovery. In fact, better information about minimum viable populations, and genetic considerations unavailable pre-recovery prompted biologists to push for higher numeric goals. Bergstrom et al. (2009) argued that ecosystem recovery should be a recovery criterion for wolves in the northern Rockies.

Bergstrom et al (2009) cited Leonard et al (2005), who determined by DNA analysis that the pre-settlement wolf population of the western conterminous U.S. and Mexico was around 380,000, and noting, "and that it is likely to be an underestimate, (and) it is compatible with the estimate of Seton (1929) of about two million wolves in North America."

P. 11. Re: Population Objectives - Again, I hope you will stress that this number is a minimum, not a goal or cap. In pursuit of adaptive management, I hope that OFWD does not box itself in to arbitrary numbers, but instead will state a goal of allowing wolves to reach densities in low-

conflict wild areas that would allow them to become ecologically functional as strongly interacting species. The goal of wolf management might better be to establish ecologically effective populations of wolves (Lee et al. 2012) wherever the absence of conflicts with livestock make that feasible.

Here is a cogent comment on this topic, from Soule et al (2005).

“Obsolescence of environmental laws and regulations is unavoidable, and policies dealing with endangered species and ecosystem conservation often lag decades behind the relevant science. For example, endangered species laws and regulations and other conservation statutes typically fail to consider the interactions of strongly interacting species, probably because the importance of such interactions was not well understood when the laws were drafted. By failing to consider current knowledge, therefore, natural resource scientists and managers may be harming the species and systems they are charged with protecting. Most ecologists agree that the conservation of biodiversity is facilitated by maintaining population densities and distributions of strongly interactive species above estimable thresholds for ecological effectiveness. Assuming that conservation biologists and natural resource managers are “physicians to nature,” we therefore propose they are obligated to adhere to a doctrine of “best conservation practices based on the best science,” applying a more rigorous standard for the management of relatively interactive species than may be mandated by older statutes and effected by current practice and convention.”

Treves et al offer a treasure trove of forward-looking thought in *Predators and the public trust* (2015). Among their six conclusions: “Traditional wildlife conservation in the U.S.A. and western Europe, and particularly predator conservation, has been dominated by a constitutive process that favored hunting and other forms of lethal management. Those traditions often led to abdication of governmental trust duties and eradication of predators over vast areas, contrary to public trust principles. However recolonization by several species of predators since the 1970s suggests that stronger public trust doctrines can prevent renewed cycles of eradication.”

P. 12. I would define a healthy population as one that is ecologically effective. While we are on the topic of population, perhaps it is fair to point out that, free of exploitation, wolves control their own numbers. Smith et al (2012), using 14 years of data from a long-term study of wolves in Yellowstone, noted, “At the population level, litter size and survival decreased with increasing wolf population size and canine distemper outbreaks.” In the 2011 annual report of the Yellowstone wolf project, we read: “Intraspecific mortality was again the leading cause (of wolf deaths).” Flatly put, when wolf populations rise, wolves kill each other.

Cariappa et al (2011) analyzed data collected at 32 sites across North America using linear and nonlinear regression and found that the evidence supported wolf population regulation by density-dependence as much as limitation by prey availability. The data suggested that wolf populations are self regulated rather than limited by prey biomass by at least a 3:1 margin. They wrote: “In establishing goals for sustainable wolf population levels, managers of wolf reintroductions and species recovery efforts should account for the possibility that some regulatory mechanism plays an important role in wolf population dynamics.”

More recently, Cassidy et al (2015) concluded: “With the recent findings that density-dependent intraspecific aggression regulates the survival of northern Yellowstone wolves (Cubaynes et al. 2014), our study demonstrates a socially mediated mechanism by which this vital rate is influenced in this population. Our findings also have management implications for social carnivores where human exploitation may alter group composition through the removal of specific individuals. Such anthropogenic influence could indirectly affect competitive abilities of groups, altering natural social dynamics with fitness and population-level consequences.”

Cubaynes et al (2014). cited by Cassidy et al, concluded: “Our results indicate that density-dependent intraspecific aggression is a major driver of adult wolf survival in northern Yellowstone, suggesting intrinsic density-dependent mechanisms have the potential to regulate wolf populations at high ungulate densities. When low prey availability or high removal rates maintain wolves at lower densities, limited inter-pack interactions may prevent density-dependent survival, consistent with our findings in the interior of the park.”

P. 13. It is good to clarify in the plan that any number mentioned “...in maintenance...” is not intended as a cap.

P. 15. It is good to reiterate, “...seven breeding pairs is not a sufficient population cap threshold.”

P. 23. Diseases and Wolf Health. (Also Appendix B., P. 107-on.) Opponents to wolf recovery in the northern Rockies used the fear of rabies and *Echinococcus granulosus* as red herrings in an effort to build opposition to recovery. My reading (and your citation on P. 114) of Mark R. Johnson, (1995), and my attendance at a Montana Legislature Environmental Quality Council meeting May 7, 2010, put those issues in perspective for me. The meeting was billed as Agency Oversight: FWP - Wolf Management. It was really an attempt to show that *E.q.* carried by wolves was an imminent hazard to Montanans. In brief, one consultant railed about the danger of *E.q.*, and four others recognized it as present, but not a major threat to health. I can send you my notes from the meeting if you wish.

My take, based on historical, anecdotal, and peer-reviewed sources, is that, in the case of rabies, wolves die quickly from rabies, are unlikely to spread it, and may even reduce the prevalence of rabies on the landscape by limiting the populations of mesopredators such as skunks and foxes. The anecdote: Carter Niemeyer, author of *Wolfer* (2010), was hired to trap skunks in northeastern Montana for a rabies study. He was able to pay his way through college by trapping foxes on the side. I think that the prevalence of both those animals and the presence of rabies was an indirect result of the elimination of wolves and coyotes there.

Here’s a more definitive look at the results of eliminating top carnivores: Prugh et al wrote in *BioScience* (2009) that, “Apex predators have experienced catastrophic declines throughout the world as a result of human persecution and habitat loss. These collapses in top predator [wolf] populations are commonly associated with dramatic increases in the abundance of smaller predators. [coyotes, foxes, skunks, raccoons] (T)his trophic interaction has been recorded across a range of communities and ecosystems. Mesopredator outbreaks often lead to declining prey populations, sometimes destabilizing communities and driving local extinctions....—

mesopredator outbreaks are causing high ecological, economic, and social costs around the world.”

It seems to me that, while we are considering diseases, we should also recognize the potential role of wolves in preventing or slowing the spread of diseases that afflict other wildlife, and cattle. Wildlife veterinarian Mark R. Johnson, cited above, wrote the protocols and supervised the handling of all wolves translocated from Canada to the U.S. in 1995-1996. He also wrote (1992) that wolves scavenge carrion, such as aborted bison or elk calves. By eating them, they may reduce the spread of Brucellosis to other bison or elk.

Chronic wasting disease is marching inexorably across the North American landscape. The State of Montana is just beginning to plan for its arrival. We should consider the services wolves provide that can avert epizootics of wildlife diseases. Bruce L. Smith, in his 2012 book, *Where Elk Roam*, warns us of the danger of concentrating elk on feed grounds, because of two serious diseases: brucellosis and chronic wasting disease (CWD). Noting that Wisconsin had spent \$27 million depopulating its whitetail deer to curb CWD (and no CWD had been detected where wolves live), he traced the inexorable march of CWD across Wyoming. “Recent modeling suggests wolf predation may suppress CWD emergence in deer.” Wolves and other large carnivores are essential to the health of the ecosystems on which our game animals and we depend. Wolves have been shown to be capable of reducing or eliminating the spread of brucellosis and chronic wasting disease (Hobbs 2006, Wild et al 2011), in part by reducing density and group sizes of elk and deer. Wild et al concluded, “We suggest that as CWD distribution and wolf range overlap in the future, wolf predation may suppress disease emergence or limit prevalence.” Cross et al (2010) wrote, “(T)he data suggest that enhanced elk-to-elk transmission in free-ranging populations may be occurring due to larger winter elk aggregations. Elk populations inside and outside of the GYE that traditionally did not maintain brucellosis may now be at risk due to recent population increases.” Wise et al (2011) also observed that Wisconsin had extended their hunting season one year to over 100 days, in an attempt to reduce white-tailed deer, to little effect.

Hunters can't contain CWD. But wolves can: they are on the hunt 365 days of the year, 24 hours of the day, with 100 times our sensory capacity, sifting and sorting for disabled or disadvantaged prey that is less likely to kick their teeth out.

P. 30. III. Wolf-Livestock Conflicts. I applaud the stated wildlife policy of managing wildlife at optimum levels.

In 1989, Yellowstone staff had only data from Alberta and northern Minnesota to use in estimating potential depredation in the northern Rocky Mountains. Today we have two decades of data from the tri-state area to cite in estimating losses in Oregon. A couple of years ago, I did a bit of back-of-the-envelope math, as follows: Wolf depredation in the northern Rocky Mountains (ID, MT, & WY)

From: <http://www.fws.gov/mountain-prairie/species/mammals/wolf/annualrpt14/index.html>
(Now, the Rocky Mountain Wolf Recovery 2015 Interagency Annual Report URL is:
www.fws.gov/mountain-prairie/es/wolf-2016.php.)

In 2014, the NRM (MT, ID, and WY) wolf population was >1,657 wolves in >282 packs (including >85 breeding pairs). MT estimated 554 wolves in 134 packs with 34 breeding pairs; ID 770 wolves in 104 packs with 26 breeding pairs; WY 333 wolves in 44 packs with 25 breeding pairs;

Total confirmed depredations by wolves in 2014 included 140 cattle, 172 sheep, 4 dogs, 1 horse, and 1 donkey. Private and state agencies paid \$274,885.90 in compensation for wolf-damage to livestock in 2014. Federal, State and Tribal agencies spent approximately \$3,146,006.00 of federal funding for wolf management and research.

There were about 6,000,000 cattle in the NRM in 2014. The 140 cattle taken by wolves made up 1 in 43,000, or 0.000023% of cattle in the states.

There were about 825,000 sheep in the NRM in 2014. The 172 sheep taken by wolves made up 1 in 4,800, or 0.000208% of sheep in the states.

Livestock figures are from <http://usda.mannlib.cornell.edu/usda/nass/SB1034/sb1034.pdf> and http://www.nass.usda.gov/Publications/Todays_Reports/reports/shep0116.pdf, as well as <http://www.sheep101.info/farm.html>

I suggest that it could be useful to do the math for readers of the plan, so they don't focus just on numbers, but realize that, percentage wise, the impact of wolves on the livestock industry is minuscule.

In her wide-ranging critique of northern Rocky Mountain wolf recovery, Keefover (2012, Pp. 22-23) compared the livestock losses reported to National Agriculture Statistics Service (NASS) and those recorded as confirmed by the US Fish and Wildlife Service. She noted, "While the FWS uses verified reports from agents, NASS relies on unverified reports from the livestock industry." In summary, she wrote: "NASS's unverified cattle losses to wolves equaled 4,439, or 0.07 percent of the cattle inventory of 6,040,000 in Idaho, Montana, and Wyoming. FWS's verified cattle losses to wolves amounted to 188 individuals, or 0.003 percent of the cattle inventory. NASS's unverified sheep losses to wolves equaled 1,800, or 0.22 percent of the total sheep inventory of 830,000 in Idaho, Montana, and Wyoming. FWS's verified sheep losses to wolves amounted to 245 animals, or 0.03 percent of the total sheep inventory."

P. 37. The web page on non-lethal methods for producers is a great idea.

Pp. 38 & 39. Good use of the literature re: lethal removal, and good analysis of compensation.

P. 48. Yes, it is important that USDA Wildlife Services complies with NEPA.

P. 50. The URL for assistance is a positive step in promoting cooperation.

P. 50. Wolf-Ungulate Interactions. Here I am reminded of Frank Egler's dictum: "Ecosystems are not only more complex than we think, but more complex than we can think." Intense

research efforts following the return of wolves to the northern Rocky Mountains have resulted in a greater understanding of the dynamics of wolves in ecosystems. For instance, in reading Mech et al's *Wolves on the Hunt*, (2015) which chronicles 383 accounts of wolves hunting numerous species of prey, we take a quantum leap forward in our knowledge of wolf hunting behavior. But, as Rolf Peterson observes in his stellar foreword, "There is much that biologists don't know about wolves, and maybe our ignorance even exceeds our knowledge (how would we know?)."

Mech, L. David, Douglas W. Smith, and Daniel R. Macnulty, *Wolves on the Hunt: The behavior of wolves hunting wild prey*. 2015. U. of Chicago Press.

P. 52. Elk, and Pp. 58-59. The plan lists a handful of WMUs in Oregon, and their elk and mule deer populations since wolf establishment. Really, as wolves were just recolonizing the state. This sparse seven-year sample during which the Oregon wolf population grew from several to dozens is a bit small. I wonder if adding, for the interest of hunters, the population numbers of elk and hunter success in Idaho, Montana, and Wyoming would be helpful, at 21 years post-reintroduction. Here are some figures.

Montana elk harvest data

In 2015, the elk population estimate for Montana was 157,156. The lower objective estimate was 74,673, and the higher objective estimate was 107,600, so statewide, elk were 68% over objective. In 2014, elk were at or over objective in 81% of hunting districts (Dickson, 2014). Also in 2014, elk were over objective in 70 districts (about 40%).

Montana Fish, Wildlife & Parks 10-year license sales comparison Total elk license sales, by year (From Finance Division, MT FWP)

1995 - 138,700 1996 - 137,620 1997 - 131,843 1998 - 129,552 1999 - 128,900 2000 - 130,776 2001 - 132,125 2002 - 135,579 2003 - 136,374 2004 - 149,603 2005 - 147,627 2006 - 148,872 2007 - 153,333 2008 - 155,926 2009 - 156,165 2010 - 163,944 2011 - 164,433 2012 - 164,321 2013 - 169,326 2014 - 170,804 2015 - 180,278

A summary of 2014 hunter success lists 107,663 hunters spending 945,227 days afield. Non-resident hunters made up 16,357 of that number, spending 126,926 days afield, and residents totaled 91,307, reporting spending 618,301 days afield. Total elk harvest was 25,735. Success rate for non-residents was 26.3%, and for residents, 13.6%; in sum, 15%. That compares to 2008, when success rate was 21.67% in sum.

These figures are from <http://fwp.mt.gov/hunting/planahunt/harvestReports.html#elk> Data for 2004-2014 are available there. Deer (Combined) reports for 2001-2008 are on that site, as are those for moose, bighorn sheep, and mountain goats.

The figures are tabulated in tiny print, in 16 columns, and by hunting district, of which there are more than 700 in Montana. By scrolling to the bottom, you can get to summaries for N - non-resident, and R - resident, and totals for the state.

In his article, Weighing in on Wolves, in the Montana Fish, Wildlife and Parks March-April Montana Outdoors, Pp. 20-23, editor Tom Dickson noted that, "(elk) Numbers remain strong across most of the state's primary wolf range."

Idaho elk data

From: <http://fishandgame.idaho.gov/public/about/2015annualReport.pdf>

Annual total resident elk license sales, 2004 to 2015.

2004 - 80,683 2005 - 78,259 2006 - 81,584 2007 - 80,694 2008 - 82,417 2009 - 77,788 2010 - 75,298 2011 - 76,284 2012 - 70,592 2013 - 73,036 2014 - 76,576 2015 - 82,981

Annual total non-resident elk license sales, 2004 to 2015.

2004 - 14,038 2005 - 15,291 2006 - 14,581 2007 - 15,121 2008 - 14,789 2009 - 12,980 2010 - 10,385 2011 - 9,158 2012 - 8,623 2013 - 8,942 2014 - 9,431 2015 - 12,191

Figure on P. 28 (or 118): 2012 Elk Population Status by Elk Zone

"Currently, elk herds met or exceeded management objectives in 19 of 29 elk management zones, and provide hunting opportunities ranging from trophy bulls to extra cow hunting opportunities to meet objectives. In the remaining 10 zones, Fish and Game is working hard to improve elk survival...including cutting back on harvest of some hunts and implementing programs to reduce predation."

SEE <http://fishandgame.idaho.gov/>

Also see: <https://collaboration.idfg.idaho.gov/WildlifeTechnicalReports/Forms/AllItems.aspx>
Here you will find technical reports with data from 2000 to 2013. Figures cannot be copied and pasted, because of the pdf form.

Idaho Elk Tech Reports data:

Total Harvest: 2000 - 18,441 2001 - 18,042 2002 - 16,361 2003 - 18,442 2004 - 19,251 2005 - 20,619 2006 - 19,241 2007 - 18,901 2008 - 15,994 2009 - 15,788 2010 - 17,570 2011 - 15,139 2012 - 16,391

Elk Hunters: 2000 - No data, 2001 - 77662 2002 - 83712 2003 - 84,782 2004 - 85,686 2005 - 86829 2006 - 85,992 2007 - 98,266 2008 - 96,763 2009 - 78,841 2010 77,112 2011 - 74,699 2012 - 73,403

On P. 2, Statewide Elk Harvest is shown in a figure for 1935-2007.

The 2008 Statewide Population Survey counted 103,613 elk.

From the summary of the 2013 report: “Elk populations increased over the latter half of the 20th century; however, they have declined slightly statewide in the last 12 years. Human development has reduced available habitat on winter ranges and increased access into elk habitat, and wolves were reintroduced by the U.S. Fish and Wildlife Service in 1995 resulting in another large predator on the landscape. Although populations are increasing in much of the state where elk were not traditionally found, some historically popular elk herds have been in decline. The poor economy and impacts of wolves are the primary reasons cited by nonresidents for not returning to hunt Idaho the last couple of years.”

<https://collaboration.idfg.idaho.gov/WildlifeTechnicalReports/Big%20Game%20Harvest%20Statewide%202013.pdf>

From the 2013 Big Game Harvest report, Table 1, activity for 2012: Deer - Tags sold, 134,232; 121,169 hunters took 49,644 deer, for a success rate of 42%, and days hunted were 787,963. Elk - Tags sold, 80,557; 73,161 hunters took 16,418 elk, for a success rate of 22%, and days hunted were 490,796. Pronghorn - Tags sold, 2,686; 3,041 hunters took 1,536 pronghorn, for a 50% success rate, and days hunted were 11,779.

Table 2 depicts Big game harvest history, 1935-2012. Appendix A is a summary of 2012 big game harvest estimates.

Wyoming elk data 1996-2014

Plan readers who want to see the big picture on wolf recovery in the northern Rocky Mountains can find annual reports from all states in the region at Rocky Mountain Wolf Recovery 2015 Interagency Annual Report is www.fws.gov/mountain-prairie/es/wolf-2016.php. And If you have a question? Contact us at: WesternGrayWolf@fws.gov.

P. 68. E. Strategies to Address Wolf-Ungulate Interaction

In his masters thesis, The Impact of wolves on Elk Hunting in Montana, MSU graduate student Steven Hazen (2012) wrote, “Since wolves primarily prey on big game, Montana’s hunting industry will likely be impacted in various ways.*** Overall, wolves decrease hunter applications by 19.9% of the standard deviation in the southwest and 2.9% of the standard deviation in the west central region. This corresponds to 286 fewer applications in the southwest, but only 6 fewer in west central Montana... (U)sing the current data available wolves are not having a significant effect on elk harvest in Montana. On the other hand, they are shifting demand in the southwest region from areas in close proximity to the border of YNP to areas farther away.” (Montana sold 235,600 big game hunting licenses in 2012.)

I appreciate the plan’s implied restraint in using lethal methods with the intent of not impacting wolf population viability. Some wildlife biologists and ethicists question the values involved in killing predators to enhance human hunting opportunities. For example, wolf biologist Paul Paquet spoke at a plenary debate about hunting and trapping at the 2013 International Wolf Symposium, asking, “Why Does it Matter?” Here is one paragraph from his speech. “With notable exceptions such as parks, the management philosophy and policies of most government agencies are narrowly directed towards treating wolves as a “resource” to kill. Most government

agencies have adopted policies skewed towards preserving opportunities for recreational killing rather than conservation or preservation of ecological integrity. Ignoring biology and the intrinsic value of species, wildlife agencies have resolutely judged wolves as animals in need of management, adopting policies that treat them as a problem, rather than as respected members of the biological community.”

P. 58. While discussing moose, we might consider the benefits of wolf recovery on moose forage. Joel Berger et al (2001) demonstrated “a cascade of ecological events that were triggered by the local extinction of grizzly bears...and wolves from the southern greater Yellowstone ecosystem.” In about 75 years, moose in Grand Teton National Park erupted to five times the population outside, changed willow structure and density, and eliminated neotropical birds; Gray Catbirds and MacGillivray’s Warblers.

Yukon wolf biologist Bob Hayes’s statement on hunting and on wolf control:

Hayes is a bona fide wolf scientist. He studied them from 1982 to 2000. He approached wolf control as an experiment, asking, “Are we doing the right thing?” He wrote, “The interest in controlling wolves during the 1950s and 1960s was a result of a real belief they were solely responsible for the low game numbers through the Yukon.” Public attitudes about wolves were slowly shifting in North America in the 1970s... A new understanding about the ecology of wild wolves began to emerge in the late 1970s, especially in Alaska and Minnesota where the first radio telemetry studies were conducted. With new information, wolf biologists could design studies that measured the real effects of wolf predation on big game. “A new ethic began to emerge in wolf management - if an agency is planning to kill wolves to increase game then the program should be designed as an experiment with predicted outcomes. “Through it all, I came to better understand the critical role wolves play in shaping northern ecosystems.” He notes that, “The wolf is the fuel that fires the Yukon wilderness.”

Alaskans have killed wolves and bears for many decades. Without them, moose have increased to 100 moose per 100km². “But what is lost is the natural predator element that completes wilderness. It is wildlife farming. Is this what we want in the Yukon?” In 2009, the Porcupine Caribou Management Board asked Hayes if he would recommend broad scale wolf control, and he said no, leave the system alone and let it run its natural course. “I spent eighteen years studying the effects of lethal wolf control on prey populations. The science clearly shows killing wolves is biologically wrong.”

“As I began to better understand the wolf, I developed a clear answer to my question about the effectiveness and moral validity of lethal wolf control programs.” A decade after his retirement in 2000, Hayes wrote, “I can now say the benefits of broad scale killing of wolves are far from worth it - not to moose, caribou, Dall’s sheep or people. It should never happen again.”

A sense of complete wilderness is what the Yukon government is selling to tourists, and tourism is one of the most important industries in the Yukon economy. “The down side is predation keeps prey populations low and there are few, if any, animals available for human hunters to take in the long run.” Hayes discusses options for improving moose and caribou habitat, but notes that climate change will reduce caribou range. “The only way to achieve more moose or caribou

in the Yukon is to reduce the predation rate on calves and adults. To keep prey high, predators have to be permanently controlled, an approach that I wholeheartedly reject because it would mean we would be essentially farming, not managing Yukon wildlife.”

P. 65. Barnowe-Meyer et al (2009) added to our understanding of the importance of wolves relative to pronghorn.

“Across areas selected by migratory and nonmigratory pronghorn, we documented cause-specific mortality of adults and fawns and assessed relative risk of predation by various predators. Coyotes (*Canis latrans*) accounted for 56% of adult predation and up to 79% of fawn predation. ***Our results suggest that even when pronghorn are in the presence of multiple predator species, coyote predation on adults and fawns may predominate for populations inhabiting shrub-steppe habitat. ***While the direct effect of wolves on overall mortality was low, wolves may indirectly influence survival rates of adult females and fawns by altering the behavior and space use of sympatric predators, particularly coyotes.”

P. 65. Wolf Interaction With Other Carnivores. Somewhere in this or elsewhere, perhaps at P. 79, Research etc., I think it is important to briefly treat the multiple effects wolves have on numerous species, from plants to scavengers, including insects. Mark Hebblewhite and Doug Smith (2010) listed species they observed on 221 ungulate prey carcasses between 1995 and 2000 that were killed by wolves. In Banff National Park, they tallied 20 species: Most common were ravens (present at 96% of all kills), coyote (51%), black-billed magpie (19%), pine marten (14%), wolverine (8%), and bald eagles (8%); others, in descending order, were gray jay, golden eagle, long- and short-tailed weasel and least weasel, mink, lynx, cougar, grizzly bear, boreal and mountain chickadee, Clark’s nutcracker, masked shrew, and great grey owl. In Yellowstone, they noted twelve scavengers, of which five visit virtually every kill: coyotes, ravens, magpies, and golden and bald eagles. More species of beetles use carcasses than all vertebrates put together. Sikes (1994) found 23,365 beetles of 445 species in two field seasons at wolf killed carcasses. No predator feeds as many other creatures as wolves do.

Ordiz et al (2013) wrote, “Large terrestrial carnivores, e.g. wolves or bears, often play a key ecological role from their position at the apex of trophic systems. Changes to their populations reverberate through ecological communities; consequently their widespread decline in numbers and shrinking distribution due to human persecution has brought about a loss and reconfiguration of biological diversity in many systems. Although many large carnivore populations are now under conservation-minded management, political and economic constraints make compromises necessary. A common compromise is to permit limited harvests, with the premise of sustainability and the objective to increase tolerance and funding for carnivore recovery and conservation. Here we question whether a large carnivore that has to “look over its shoulder” for human hunters can still fully perform its ecological role at the apex of a trophic system. We use information about carnivore behavior, ecology, trophic interactions, and the effects of human exploitation to argue that exploitation of large carnivores, even if sustainable numerically, undermines the commonly expressed rationale for their conservation, namely the restoration and preservation of ecosystem functionality.”

Sivy (2015) studied the effects of wolves on Alaska's mesopredators, and wrote that, "Large carnivores may indirectly benefit small predators by suppressing competitively dominant mesopredators. ***I observed a near guild-wide response to wolf presence, whereby mesopredators were positively associated with wolves within each study area. The relative strength of top down versus bottom up effects in this study system further indicated that during a period characterized by low small mammal abundance, wolves were the strongest predictor of canid and wolverine occurrence. Coyote and red fox diet further revealed that carrion was a heavily used resource during this time of low prey abundance, yet red foxes may minimize competition with coyotes for carrion by increasing their use of voles."

Given that biodiversity enhances ecosystem stability, this is good news.

And how does all this affect birds? Joel Berger et al (2001) demonstrated "a cascade of ecological events that were triggered by the local extinction of grizzly bears...and wolves from the southern greater Yellowstone ecosystem." In about 75 years, moose in Grand Teton National Park erupted to five times the population outside, changed willow structure and density, and eliminated neotropical birds; Gray Catbirds and MacGillivray's Warblers.

In Yellowstone's Lamar Valley, the average number of ravens observed per carcass pre-wolf restoration was four. Stahler et al (2002) reported 135 on one wolf-killed carcass. Eagles averaged one per four carcasses pre-wolf. Stahler saw 12 eagles and 65 ravens on one wolf kill.

I see these interactions as important reasons to promote ecosystem stability through enhancement of biodiversity, which is endangered as the sixth extinction proceeds apace, as reported by Elizabeth Kolbert (2014).

P. 68-69. re: Strategy to Address Wolf-Ungulate Interactions. The objective of conserving both wolves and ungulates is laudable. But I see, "lethal removal may be initiated...if ODFW determines that wolves are a significant factor in not meeting established range or area objectives." I find it untenable to kill wolves as a means of boosting elk populations just to provide more of them for hunters to shoot. (By the way, I began hunting deer and other big game as a teenager, and quit only when I was no longer able to pack out what I killed.) I also note the plan allows for killing wolves that affect populations of elk at winter feeding sites; these feeding sites unnaturally congregate elk, exposing them to disease. It's ill-advised and ethically questionable to kill wolves that could be drawn to an artificially-created feeding site. It's scientifically questionable to allow killing of wolves in these circumstances, too, when wolf predation could be the very antidote needed in artificially-devised concentrations of elk to prevent the spread of disease among the elk.

P. 70. Wolf-Human Interactions. Citing Linnell et al and McNay is as good as one can do. In the plan's guidelines for appropriate behavior in wolf country, my reading of McNay suggests that maintaining close visual contact with small children, not letting them sleep outside tents, or even in a tent away from adults, and teaching them not to run, fall, roll, or scream in the presence of any predator could avoid triggering predatory behavior. And predator includes domestic dogs, which Langley (2005) reported killed 208 people in the U.S. from 1991-2001.

I consulted the visitor services office at Yellowstone to get a sense of the number of campers exposed to potential wolf incidents.

Camping data are at

<https://irma.nps.gov/Stats/Reports/Park/YELL>

<https://irma.nps.gov/Stats/SSRSReports/Park%20Specific%20Reports/Park%20YTD%20Version%201?Park=YELL>

Data are quite detailed, and reported month by month.

Extracting tent camper overnight stays, the park had 104,150 tent campers in 2015, 86,282 in 2014, 88,762 in 2013, 89,248 in 2012, 79,584 in 2011, 87,581 in 2010, 83,466 in 2009, 78,035 in 2008, 77,754 in 2007, 70,963 in 2006, 69,453 in 2005, 71,270 in 2004, 82,134 in 2003, 75,874 in 2002, 78,346 in 2001, 75,504 in 2000, 76,803 in 1999, 84,102 in 1998, 84,698 in 1997, 70,867 in 1996, and 88,893 in 1995.

1995-2015 total: 1,702,769 tent campers used Yellowstone developed campgrounds, averaging 81,084 per year.

Backcountry data can be found at

<http://www.nps.gov/yell/planyourvisit/backcountryhiking.htm>

From 1995-2015, a total of 878,140 person use nights in the backcountry were recorded, averaging 41,816 person use nights per year.

Among those 2,580,909 tent campers in developed campgrounds and in the backcountry, no camper was injured by a wolf. Meanwhile, the numbers of wolves and packs in the park at each of the 21 years' ends were as follows.

1995 - 21/3 1996 - 51/9 1997 - 61/7 1998 - 112/11 1999 - 118/11 2000 - 177/18 2001 - 132/9 2002 - 148/14 2003 - 174/13 2004 - 171/16 2005 - 118/13 2006 - 136/13 2007 - 171/11 2008 - 124/12 2009 - 96/14 2010 - 97/11 2011 - 98/10 2012 - 83/10 2013 - 96/10 2014 - 104/11

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I hope these overlong comments are helpful to the drafters of the ODFW wolf plan. I would be happy to clarify any of the issues I have raised.

Norman A. Bishop
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Bozeman, MT 59715
nabishop@q.com
(406) 582-0597

Roxann B Borisch

From: Mark Wheeler <mark@rootsrealty.com>
Sent: Tuesday, May 16, 2017 12:51 PM
To: ODFW Commission
Subject: Please save the Wolves!

Please save the Wolves! Thank you.

Mark Wheeler
628 SE 58th Avenue
Portland, OR 97215

Roxann B Borisch

From: shellyfort@comcast.net
Sent: Tuesday, May 16, 2017 1:06 PM
To: odfw.commission@state.or.us
Subject: comments for May 19th meeting in Portland

Dear Wildlife Officials,

I am unable to attend the public comment meeting on May 19th in Portland regarding wolves and I wanted to send you my comments.

My family and I moved to Oregon six years ago because we wanted to live in a place that has a lot of beautiful nature and wild, living creatures. We have appreciated the ability to be in nature and experience the beauty and interconnection of all living things. An integral part of this chain of living things are our wolves in Oregon.

Science has proved that we need wolves for the healthiest ecosystem available. We don't have a large population of wolves here or anywhere in the world anymore. There should be no hunting or trapping allowed, period. We must allow nature to take its course and let the wolves and other wild animals live in peace. There must be a place where the animals are safe from man.

Ranchers can take better precautions to protect their cattle and sheep. Alpacas and various types of farm guard dogs can be used, along with cowboys, to keep the wolves away.

Hunting and trapping is not the solution.

Thank you,

Shelly Fort
Eugene, Oregon 97405
541 603 8148

Roxann B Borisch

From: kris maenz <ladybirdmnz@yahoo.com>
Sent: Tuesday, May 16, 2017 1:23 PM
To: odfw.commission@state.or.us
Subject: phase 3 wolf management

Thank you Oregon Fish and Wildlife Commission,

As you consider revisions to the Oregon Wolf Plan, please make sure it continues to promote the preservation of wolves and the habitat they need to survive.

Provisions in the plan that allow wolf hunting and trapping should be removed.

Ranchers, hunters and other NGOs should never be allowed access to live wolf tracking data.

The definition of chronic depredation and enforceable requirements for non-lethal measures and transparency should be no less in the newest management level than they were prior to 2015.

It has been proven in Yellowstone that a vibrant and healthy wolf population is possible without human intervention and that the ecosystem as a whole is in much better ecological condition when upper level predators are allowed to thrive.

Wolves play an important role on the landscape and have many positive benefits. It is time to show that Oregon supports upper level predators and a healthy ecosystem.

Thank you.
Kristin Maenz
3915 E. 17th
Eugene, OR 97403

Roxann B Borisch

From: Tim Rozewski <rozewski@yahoo.com>
Sent: Tuesday, May 16, 2017 2:03 PM
To: odfw.commission@state.or.us
Subject: I support the Draft Wolf Plan, you should as well

As a lifelong hunter and outdoorsman here in Oregon I find it ridiculous that non-outdoorsmen could have any influential impact on the management of our big game animals. Your agency is tasked with the job and yet you have failed to do so for years. You have allowed politics influence science and your jobs. That has to end.

I support the DRAFT Wolf Plan that has been recently been shared with us from you and many organizations, such as OOC, OHA and RMEF, that represent outdoorsmen that are impacted the most by this and all predator plans. The lifeblood of the outdoor community, the icon of the wild west, and the primary resource that funds your agency are our big game animals. Our poor management of other predators in Oregon has absolutely ruined historic deer and elk populations and ranges. Deer are attempting to escape by coming into towns and the cougars, for example, are following. This can NOT happen with wolves. Wolves, as you know, are much more aggressive that cougar or even bear.

Support the draft plan. It is right for our big game herds, is sound science....and for once hold true on your word and past committee work that puts you in this place now. Sadly we have achieved wolf numbers needed to start managing them faster than we all feared.

Tim Rozewski 503.330.8589 rozewski@yahoo.com

Roxann B Borisch

From: Goat Hunter <goathunter.oregon@gmail.com>
Sent: Tuesday, May 16, 2017 2:15 PM
To: odfw.commission@state.or.us
Subject: Please Support the Draft Wolf Plan

Dear Commissioners,

I am writing to request your support for the draft wolf plan. I am an avid conservationist and hunter. I have donated hundreds of hours of volunteer time and thousands of dollars for wildlife conservation through my leadership roles in the Rocky Mountain Elk Foundation, Ducks Unlimited, the Oregon Foundation for Blacktail Deer, and the Oregon Hunters Association. As a conservationist, I welcome the return of wolves to Oregon. I also encourage you to continue down the path of science-based wolf management as the wolf population continues to increase. As each wolf population objective is met, please continue to advocate for hunting as one means of population control when needed. Wolves need to be considered and treated the same as any other predator in Oregon, where populations are balanced with other species and hunting is used as one of many management tools.

Thank you for all you do for our wildlife!

--MATT

Matt Alford
39360 SW Laurelwood Rd
Gaston, OR 97119
503-780-2596
goathunter.oregon@gmail.com

Roxann B Borisch

From: rshepard@localhost.domain.invalid on behalf of Rich Shepard <rshepard@twodogs.us>
Sent: Tuesday, May 16, 2017 2:28 PM
To: odfw.commission@state.or.us
Subject: Please support the draft wolf plan

I am a member of the Oregon Hunters Association (OHA) and encourage you to support ODFW's new wolf plan.

Predators are essential components of ecosystem biota, but cannot be the dominant component in any mix of predator and prey populations. This is an especially important relationship when not all prey species are non-domesticated ungulates and small mammals. Livestock and domesticated pets are desirable prey to wolves because they are easily caught. Wolf populations need to be scientifically controlled to retain the ecological balance between their populations and potential prey populations.

Wolves have successfully re-established in Oregon and ODFW has been proactive in planning for them through an effective management plan process supported by OHA. ODFW's proposed plan allows for continued growth and health of the wolf population, yet considers other very important concerns for Oregonians, such as hunting for deer, elk, and other big game, and the agricultural activities of Oregon.

Hunting is part of the management tool bag OHA wants the ODFW to be able to use when/if the need arises. When necessary, hunters can aid ODFW in controlled wolf take, lowering financial impact on ODFW's strained budget, most of which now comes from hunters and anglers. It's very important to recognize that rural Oregon bears the most impact from predators (cougar and wolf) with results that adversely affect local economies, family livelihoods and safety.

Regards,

Dr. Richard Shepard
Troutdale
503-667-4517