

WOLF CONSERVATION & MANAGEMENT PLAN

PUBLIC CORRESPONDENCE

**Received:
January 2, 2019 to
May 23, 2019**

Roxann B Borisch

From: James Hepler <jim@azimuth-surveying.com>
Sent: Wednesday, January 2, 2019 3:09 PM
To: odfw.commission@state.or.us
Subject: Wolf plan, keep hunting and trapping

Dear Commissioners,

Please keep controlled hunting and trapping of wolves in the wolf plan. Once wolf numbers are met, we must be able to manage them with hunting and trapping. We want elk and deer numbers to be healthier and we don't want livestock and pets killed by wolves. Humans are a part of the ecosystem too; their needs, including hunting and eating wild game, must be considered. Controlling wolves is necessary to prevent a repeat of Idaho's elk disaster. If elk removal is needed for the health of the herd, let hunters have the opportunity. Keeping controlled hunting and trapping of wolves in the plan is the only reasonable way to maintain healthy deer and elk populations for hunters.

Sincerely,
James S. Hepler
403 Phelps Mountain Lane, SE
Silverton, OR 97381

Roxann B Borisch

From: Daniel Meyers <danielgmeyers@gmail.com>
Sent: Thursday, January 3, 2019 5:19 AM
To: odfw.commission@state.or.us
Subject: Wolf plan - public comment

Dear Commissioners:

I want to provide public comment as you evaluate the wolf plan for Oregon. Last October I hunted deer in the Mount Emily unit. Certainly this is one of the premier hunting areas of the state and I have hunted elk, deer and bear there previously. I was disappointed in how few deer there were. In 4-1/2 days of hunting I only saw 2 deer during hunting hours. I got out of the pickup and walked 35 miles in those days and hunted hard. I never talked to another hunter that got a buck. This was quite a contrast to previous hunting trips that I have made there. The consensus of the hunters I talked to was that predation was severely hurting the deer population. In support of this conclusion I did see four wolves one evening on the hunt. Although armed it was quite a chilling sight to see these creatures and I have a new respect for their size and speed.

I appeal to you to strictly limit the number of wolves through issuance of hunting tags so that Oregon doesn't suffer further big game losses.

Sincerely,

Dan Meyers
865 Territorial St.
Harrisburg, Oregon

Sent from my iPad

Roxann B Borisch

From: Sean Stevens <ss@oregonwild.org>
Sent: Friday, January 4, 2019 4:58 PM
To: nik.blosser@oregon.gov; MINER Jason * GOV; amira.streeter@oregon.gov
Cc: odfw.commission@state.or.us; Danielle Moser; Nick Cady; Quinn Read; Suzanne Stone; Amaroq Weiss
Subject: Wolf Plan Stakeholder Representative update from conservation organizations
Attachments: Conservation letter to Governor WPSR 010419.pdf

Nik, Jason, and Amira,

Thank you for your continued engagement in the future of wolf conservation and management in Oregon.

Please accept the attached letter to the Governor on behalf of Cascadia Wildlands, Center for Biological Diversity, Defenders of Wildlife, and Oregon Wild pertaining to the future of the Wolf Plan Stakeholder Representative Work Group.

We remain committed to finding solutions for Oregon's wolf plan that keep recovery on the right track while ensuring the needs of all stakeholders can be met.

Please feel free to reach out with any questions or concerns.

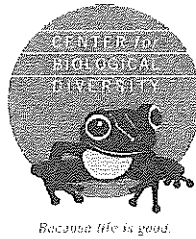
Thank you,
Sean

CC: Oregon Fish and Wildlife Commission

--
Sean Stevens
Executive Director
Oregon Wild | www.oregonwild.org
(503) 283.6343 ext 211 | ss@oregonwild.org

Protecting and restoring Oregon's wildlands, wildlife, and waters as an enduring legacy for future generations since 1974.





January 4, 2019

Governor Kate Brown
Office of the Governor
900 Court Street NE, Suite 254
Salem, OR 97301-4047

Re: Wolf Plan Stakeholder Process

CC: Nik Blosser, Jason Miner, Amira Streeter, Fish and Wildlife Commissioners

Dear Governor Brown,

On behalf of Cascadia Wildlands, Center for Biological Diversity, Defenders of Wildlife, and Oregon Wild we are writing to express our opposition to the direction of the Wolf Conservation and Management Plan stakeholder process and draft plan. The Oregon Department of Fish and Wildlife's current proposed resolutions to be reflected in the Plan update are not only weaker than previous drafts, but highlight the failure of this flawed stakeholder process to develop a plan that represents the values of Oregonians. After reviewing ODFW's latest draft, it is clear the agency's intention is to find ways to kill wolves faster, not prioritize conflict prevention through non-lethal measures. Barring a change in direction, our four organizations will be collectively and actively opposing the revised Plan as proposed by ODFW.

We believe that a sound stakeholder process – one that provides neutral oversight and guidance while encouraging meaningful discussion and collaborative brainstorming – would have provided an opportunity for a better outcome. Unfortunately, ODFW undermined this opportunity by rigidly controlling the process and leading us to a seemingly predetermined outcome while bouncing between participating as a stakeholder and controlling the facilitation process and direction. We made sincere recommendations to improve the Plan by increasing resources for proactive, effective methods to better protect livestock and the state's struggling wolf population. However, it has become abundantly clear that our good faith efforts to propose solutions and explore common ground in the stakeholder process have been for naught. Every amendment to the Plan we have suggested in this process has been rejected by ODFW. Therefore, we will be withdrawing from the facilitated stakeholder process.

The Wolf Plan review process began three years ago after ODFW prematurely removed state endangered species protections for wolves. From the outset, ODFW struggled to draft a plan that reflected the public's desire to appropriately balance the positive impacts of continued wolf recovery with mitigating the rare - but real - challenges to some livestock owners. The agency's increasingly controversial and unscientific draft proposals were opposed by all stakeholder groups. About a year ago, your office aided in the initiation of a new process so Oregonians would get the Plan they deserve - a plan based in science, one that is reflective of Oregon's conservation values, and one that prioritizes

using non-lethal measures as a way to reduce conflict. Ultimately, this approach would result in fewer dead livestock, fewer dead wolves, and less human conflict.

As has been the case for more than a decade, we participated in good faith – even while sharing our concern about this problematic ODFW-controlled process. We have been at the table for every stakeholder meeting, testified in front of the Fish and Wildlife Commission at each opportunity, engaged with independent scientists, developed and shared memorandums that detailed our position and recommended revisions, and finally, made serious attempts to negotiate with the other stakeholders and ODFW throughout this facilitated process. Unfortunately, your Department of Fish and Wildlife has again illustrated that they are unwilling to develop a plan that honors your expressed vision and the wishes of the Oregon people. It is evident that ODFW will disregard science under political pressure. Killing wolves should be at most an action of last resort. Sadly, this proposed plan stands as yet another example of the agency putting commercial interests ahead of Oregonians who value native wildlife.

Therefore, we are requesting that you communicate with ODFW leadership to craft a plan that aligns with the best available science and Oregon's values. More specifically, we ask that you communicate to ODFW that the \$1.17 million dollars you have allocated in your 2019-2021 budget for Wolf Plan implementation may not be used for killing wolves. Instead, over the next five years - the expected length of the new Wolf Plan – ODFW must focus on prioritizing meaningful, transparent, enforceable, and effective non-lethal measures and only allow wolves to be killed in active defense of livestock. With those measures in place and to mitigate concerns from the livestock industry, we ask that you direct 50% of the \$1.17 million to reform and drastically increase funds for an existing program that compensates livestock operators to fund non-lethal conflict prevention work and mitigate any potential economic impacts caused by wolves.

Oregonians deserve a science-based plan that leads to less conflict and killing. It wasn't that long ago, Oregon set a standard for the rest of the nation. Under previous provisions, Oregon's wolf population grew while livestock loss, wolf killing, and other conflict dramatically decreased. With your leadership it is an achievable vision. We look to you to get the Plan back on track.

Thank you. We appreciate your consideration of our request.

Sincerely,

Nick Cady
Cascadia Wildlands

Amaroq Weiss
Center for Biological Diversity

Suzanne Stone
Defenders of Wildlife

Sean Stevens
Oregon Wild

Roxann B Borisch

From: Zachary Ray <zerarcht@gmail.com>
Sent: Sunday, January 6, 2019 7:58 PM
To: odfw.commission@state.or.us
Subject: Wolf plan, keep hunting and trapping

Dear Commissioners,

Please keep controlled hunting and trapping of wolves in the wolf plan. Once outlined wolf numbers are met, we must be able to manage them with hunting and trapping. We Oregonians want hoofed mammal populations to be healthier. We don't want livestock killed, and we want the Oregon economy to stay healthy. Keeping controlled hunting and trapping of wolves in the plan is the only reasonable way to do this.

Zachary Ray
Portland

Roxann B Borisch

From: gordonjr@bctonline.com
Sent: Sunday, January 6, 2019 7:55 PM
To: odfw.commission@state.or.us
Subject: Wolf Plan, keep hunting and trapping

Dear Commissioners,

Please keep controlled hunting and trapping of wolves in the wolf plan. Once outlined wolf numbers are met, we must be able to manage them with hunting and trapping. We Oregonians want ungulate numbers to be healthier, we don't want livestock killed, and we want the Oregon economy to stay healthy. Keeping controlled hunting and trapping of wolves in the plan is the only reasonable way to do this.

Sincerely,
Gordon Neumann
Beavercreek, OR 97004

Roxann B Borisch

From: Jeff Price <jprice.pdx@gmail.com>
Sent: Tuesday, January 8, 2019 7:16 AM
To: ODFW Commission
Subject: 2017 Wolf Conservation and Management Plan

January 8, 2019

Chairman & Commissioners
Oregon Department of Fish & Wildlife

Re: Wolf Conservation and Management Plan

Dear Commissioners,

No doubt the commission is aware that adoption of the Wolf Management Plan has been delayed in excess of 12 months at this point. It is time to act without further delay. The work group has been continually delaying in an effort to reach a better consensus – that appears to be nowhere near. Compromise for all is the best that can be achieved on this contentious effort and it appears all sides have given up something to achieve what is best for wolf management in Oregon. It now appears some of the invited participants have withdrawn from the group and displayed a disingenuous at best attitude; we all can assume a lawsuit will be forthcoming. Adopt the plan as it currently exists, without further changes past full group participation that one was in place – any changes will possibly provide further support for judicial review. A genuine effort and practical approach was made by the state that included a diverse group to get the plan where it is now – one that serves all of the residents of the state – use this and move forward.

The plan provides a functional, science based and workable plan that will be flexible into the future; a requirement that will meet the certainly unforeseen situations that will develop. The plan accommodates a full array of tools for ODFW – those who must manage the wildlife for the entire state of Oregon – to utilize in keeping with their direction and purpose. We cannot provide sound management based on emotions that will not serve the animals and citizens of this state.

Furthermore, it is imperative that control include removal of animals so that an appropriate balance of the land and animals is maintained. Controlled take, both hunting and culling should be included. Wolves should be identified as a game mammal with controlled hunting as an element to conservation and management. Hunting will also provide citizens an opportunity that will offset costs for conservation measures through license/tag fees with the direct benefit of population and depredation control; it will also offset gross expenditure of government hired culling operations. Paying professionals to do something citizens are willing to pay for the opportunity to do is not something we should support when the means and opportunity can exist.

Please envision an opportunity where people can buy a tag – similar to cougar tags – but without a number limit per person; a hunter could take one or many up to a point where a controlled number are met. Look to Idaho as example – multiple tags per person and use of infilled deer and elk tags for non-residents. If, similar to cougars, hunting proves inefficient as a general standard, the surplus tag numbers go to a

government culling effort. The culling operations would be available within the management plan but hopefully negligible so that budget costs are mitigated.

As a conservationist and outdoor enthusiast, I urge the commission to place emotion aside and understand the greater population and effects that exist. The work group should finalize the current plan and recommend that the commission adopt it fully including controlled take with consideration of all Oregonians throughout the state.

Regards,

Jeff Price
Portland, Oregon

Roxann B Borisch

From: Wally Sykes <captmayo@eoni.com>
Sent: Tuesday, January 8, 2019 12:01 PM
To: ODFW Commission; curt.melcher@state.or.us
Subject: Wolf Plan Review

FYI

Dear Governor Brown:

I am writing once again to urge you to support the wishes of the vast majority of Oregonians for strong protections for our nascent wolf population.

The implacable pressure by the ODFW to weaken existing protections in the Oregon Wolf Plan during the review process has caused the four conservation organizations participating in the stakeholders' meeting to withdraw from what had become a travesty, in which the ODFW repeatedly undermined the neutrality of the facilitated discussions by acting as both a stakeholder and the boss of the "neutral" facilitator. It became apparent on reading the latest draft of the revised Wolf Plan that the ODFW, rather than participating in an objective attempt to craft a Plan that guaranteed reasonable protection for wolves and also emphasized nonlethal deterrents and management practices to protect livestock, while not ruling out lethal control as a last option, was all along moving to a pre-determined outcome. ODFW did not adopt a single proposal by conservationists.

The ODFW has a mandated commitment to wildlife conservation that it has been sidelining for decades. This recent failure to work in good faith with conservationists on the Oregon Wolf Plan is symptomatic. For too long the ODFW Commission has been dominated by hunting and fishing interests to the detriment of conservation. I ask the Governor to act to bring the Commission into conformity with the values of Oregonians by appointing conservationists and wildlife and environmental scientists to the Commission whenever possible, and to direct the ODFW to adhere to conservation values.

Thank you,

Wally Sykes
Joseph, OR

Roxann B Borisch

From: kathleen kinkel <kkinkel00@gmail.com>
Sent: Wednesday, January 9, 2019 10:03 AM
To: odfw.commission@state.or.us
Subject: Wolf Management Plan

I am concerned that the pullout by wolf conservation groups yesterday will put the plan on hold will adversely affect the passage.

I am writing you to ask that you take action and pass the plan as it is regardless of their abrupt actions. This is a serious matter and that it has taken so long to get to a passage vote indicates action needs to be taken now and not delayed further.

Please take action on this matter and accept the plan as it is intended.

Thank you,

Kathleen Kinkel
4150 Beck Ave SE
Salem, 97317

Roxann B Borisch

From: Danika Bevirt <paper.tigre@gmail.com>
Sent: Wednesday, January 23, 2019 11:13 AM
To: odfw.commission@state.or.us
Subject: Wolf Conservation and Management Plan

Dear Oregon Fish and Wildlife Commission,

I am contacting you to let you know that I do not support this draft of the Wolf Conservation and Management Plan. I want the Plan to reflect the best current science available for true wolf recovery. I support non-lethal solutions for wolf/livestock conflict resolution. I want a Plan that reflects the values of all Oregonians, not just one industry's special interests.

Thank you,
Danika Esden-Tempski

Roxann B Borisch

From: Robert Lee <wheretorobert02@yahoo.com>
Sent: Thursday, January 24, 2019 6:01 AM
To: odfw.commission@state.or.us
Subject: Please help create something truly better

Dear ODFW,
I do not support your draft of the Wolf Conservation and Management Plan.
Please make the Plan reflect the best current science available for true wolf recovery.
We in my community support non-lethal solutions for wolf/livestock conflict resolution.
We want a Plan that reflects the values of all Oregonians, not just one industry's special interests.

Please understand!
Rob

Sent from Yahoo Mail for iPhone

Roxann B Borisch

From: Tim Bingham <timmylorraine@gmail.com>
Sent: Sunday, January 27, 2019 1:58 PM
To: odfw.commission@state.or.us
Subject: Revised Wolf Management Plan

Dear Oregon Fish & Wildlife Commissioners

Regarding the proposed, Revised Wolf, Management Plan, it is my hope that you and the Oregon Fish and Wildlife Commissioners will seek a plan that will view the treatment of wolves where location, location, location is paramount in how we the people will respond to "conflicts" between humans and wolves. The basic rule of the thumb would be that if conflicts occur within the designated wildlife area, wolves are not guilty of "murder" in the event a human dies as a result of the conflict. The designated wildlife area is the "Home" of these wolves and, thus, they should not be treated as "killers." They are trying to protect themselves and their families from invaders. Humans must understand that to enter a wildlife area they are at risk of being attacked by some wildlife species, including wolves, that could cause severe injuries including death and, therefore, humans must be "smart" and be responsible for protecting themselves while in the designated wildlife area even if it means having to kill the wildlife. Just like in human life, if we are attacked by another human and fear we are at risk of being killed we can undertake measures to fight back and even kill if necessary but not be found guilty of murder and not be put to death as a result. On the other hand, if a wolf or another wildlife species leaves the designated wildlife area and attacks/kills a human then, yes, they have overstepped their boundary and must be held accountable even death if necessary. Please, look at the bigger picture and ask yourself what good does it do to our designated wildlife areas and wildlife species to go kill them when they have been encroached upon by humans and were in fear of being killed.

Thank You for looking at the bigger picture and for caring for the true meaning of "designated wildlife area."

February 3, 2019

ODFW

FEB 07 2019

Director's Office

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

Subject: Wolf Management Plan and Other

Wolf Management Plan

1. The only thing you should do is **DO NOT KILL WOLVES** unless they attack and kill people. Your policy of killing wolves when they kill cattle has to stop!
2. **Ban hunting of all prey species in the areas where wolves are.** This would allow the wolves to have plenty of their natural prey to eat and then they wouldn't prey on cattle.
3. **Ban the ranchers from having their cattle where the wolves are to reduce conflict.** This is simple common sense.
4. Work with federal agencies to end the grazing permits on federal land and the same for state land if applicable.

Other

1. **Protect predators.** Ban all hunting and all trapping of all predators unless they kill a person.
2. **Ban all trapping of all animals.** Trapping is so cruel and absolutely disgusting. There is no reason for it in this day and age.
3. Decrease hunting permits on deer, elk etc. so these animals can rebound. The predators will have what they need to eat and people like me who enjoy seeing wildlife will be able to see them.
4. Manage habitat so animals have what they need to survive.

Regards,

Animal Lover

Roxann B Borisch

From: Dale Hill <hilldale1@gmail.com>
Sent: Tuesday, February 5, 2019 3:23 PM
To: odfw.commission@state.or.us
Subject: Proposed wolf protection guideline changes

Dear Commissioners,

I am writing to express my concern for, and opposition to proposed changes to the wolf protection guidelines. These changes appear make it easier to permit killing wolves when in conflict with ranching and agricultural activities. I am adamantly opposed to these suggested changes. It is my understanding that the guidelines as proposed will allow killing actions to be taken when as few as 2 conflicts occur with wolf predation on livestock in a 9 month period. Further, suggested changes also would reduce efforts to find alternatives methods of separation to minimize conflicts and thus killing of wolves. It is my feeling that the proposed changes go against the intent of the acceptance of wolves in the state, and the need to preserve wildlife in all ways. Wolves are an important part of the ecosystem. Their temporary absence due to past conflicts with humans, has been reversed with the reintroduction of wolves into the ecosystem where they originally were present. The role played by a such predator high in the food chain is a very important one, especially critical to balancing populations and maintaining health of herds of prey species such as deer and elk.

I strongly urge the Commission to deny the proposed changes to which I refer. Wolves deserve a place to live and thrive just as do any other species. Conflict with human activities is no justification for killing the wolves when they are simply doing what nature has evolved them to do. I thank you for your consideration of this request.

Thank you,

Dale Hill
5200 Woodworth Dr.
Mt. Hood Parkdale, Oregon 97041
hilldale1@gmail.com

Dale Hill
Mt. Hood Parkdale, Oregon

Roxann B Borisch

From: sheilachristensen@everyactioncustom.com on behalf of Sheila Christensen
<sheilachristensen@everyactioncustom.com>
Sent: Tuesday, February 5, 2019 2:49 PM
To: odfw.commission@state.or.us
Subject: COMMENT re Wolf Plan Revisions

Dear ODFW Commission,

It seems that every time ODFW has an opportunity to revise the Wolf Plan, provisions are weakened even further. For example, the draft plan that was in front of the Commission in November of 2017 set a threshold of 3 in 12 months as a standard for chronic depredation (something that did not have consensus from the various stakeholders). Now, the current revisions propose 2 in 9 months -- a clear and significant erosion of protections.

Wolves are apex predator and critical to a health ecosystem. Humans have encroached into the wolves' environment and your only plan is to slaughter the wolves versus holding ranchers/farmers ACCOUNTABLE for employing proven anti-predation methods. WHY? Are you bought off by the cattle industry? SEVENTY PERCENT of Oregonians do not want wolves slaughtered due to the greed and inaction of farmers/ranchers.

When Gov Kitzhaber was in office there was a great plan of reimbursing ranchers/farmers for any killing of animals. PUT THIS PLAN back into effect!

I am writing to express my strong opposition to the current revisions of the draft Wolf Conservation and Management Plan. While the word 'conservation' is in the title, it's clear that these latest revisions by the Oregon Department of Fish and Wildlife attempt to do everything but protect our recovering wolf population.

Similarly, ODFW insists on incorporating public hunting and trapping into the Wolf Plan even after public outcry about this plan and scientist input on the negative effects of hunting on social tolerance, and statewide polling which shows that a majority of Oregonians oppose it.

THE PUBLIC IS OUTRAGED.

Finally, the proposed revisions to the Wolf Plan water-down the most important tool in the toolbox: using non-lethal measures to reduce wolf-livestock conflict. Killing wolves should truly be an option of last resort. It's important to allow enough time for effective and meaningful non lethal measures to work, however this plan undermines those efforts by merely suggesting that livestock operators use non lethal techniques, not requiring it.

Oregonians deserve a better Wolf Plan, one that results in fewer dead livestock, fewer dead wolves, and less human conflict. Unfortunately, the proposal in front of you today falls far short.

Please request that ODFW staff go back to the drawing board to bring you a plan that is scientifically justified, supported by a majority of Oregonians, and makes Oregon a new model for wolf recovery in the 21st century.

Thank you.

Sincerely,

Ms. Sheila Christensen

15245 SW Obsidian St Beaverton, OR 97007-8949 sheilachristensen@comcast.net

Roxann B Borisch

From: farronke@everyactioncustom.com on behalf of Kevin Farron
<farronke@everyactioncustom.com>
Sent: Tuesday, February 5, 2019 2:50 PM
To: odfw.commission@state.or.us
Subject: Please manage wolves responsibly like all other big game.

Dear ODFW Commission,

I am writing to express my strong SUPPORT to the current revisions of the draft Wolf Conservation and Management Plan. Wolves have reached recovery and need to be managed like all other big game.

We should not cave into the 'that's my favorite animal game' and manage wildlife based on emotion. We need to manage these based on science, what the landscape, landowners, elk, deer, etc can sustain.

I'm glad wolves are here and I hope they're here to stay. But they still need to be managed, and I'd rather they're managed by hunters who PAY INTO THE SYSTEM rather than managed by professional trappers/hunters who are paid to accomplish the same goal. It's important to listen to your constituents in Eastern Oregon who actually have to live with these wolves rather than only listening to the population hub in Portland.

Thanks for your consideration.

-Kevin

Sincerely,
Mr. Kevin Farron
1844 S 11th St W Unit A Missoula, MT 59801-4834 farronke@gmail.com

Roxann B Borisch

From: evev43@everyactioncustom.com on behalf of Eve Vogel <evev43@everyactioncustom.com>
Sent: Tuesday, February 5, 2019 6:42 PM
To: odfw.commission@state.or.us
Subject: Wolf Plan Comment on Latest Revisions

Dear ODFW Commission,

I am writing to express my strong opposition to ODF&W's proposals to reduce protections for, and increase hunting and trapping of, Oregon's wolves under the Wolf Conservation and Management Plan.

1. The draft plan that was in front of the Commission in November of 2017 set a threshold of 3 in 12 months as a standard for chronic depredation. Even this level did not have adequate scientific backing or public support. Now, the current revisions propose 2 in 9 months. There is a significant erosion of protections.
2. ODFW insists on incorporating public hunting and trapping into the Wolf Plan, even after public outcry, scientist input on the negative effects of hunting on social tolerance, and statewide polling which shows that a majority of Oregonians oppose it.
3. The proposed revisions to the Wolf Plan weaken the most important tool in the toolbox: using non-lethal measures to reduce wolf-livestock conflict. Killing wolves should truly be an option of last resort. It's important to allow enough time for effective and meaningful non lethal measures to work, however this plan undermines those efforts by merely suggesting that livestock operators use non lethal techniques, not requiring it.

Oregonians deserve a better Wolf Plan, one that results in fewer dead livestock, fewer dead wolves, and less human conflict. Unfortunately, the proposal in front of you today falls far short.

Please request that ODFW staff go back to the drawing board to bring you a plan that is scientifically justified, supported by a majority of Oregonians, and makes Oregon a new model for wolf recovery in the 21st century.

Thank you.

Sincerely,
Dr. Eve Vogel

2641 NE 8th Ave Portland, OR 97212-3866 evev43@gmail.com

Roxann B Borisch

From: adgdgz@everyactioncustom.com on behalf of Doug Goldenberg
<adgdgz@everyactioncustom.com>
Sent: Tuesday, February 5, 2019 9:48 PM
To: odfw.commission@state.or.us
Subject: Wolf Plan Comment on Latest Revisions

Dear ODFW Commission,

A sustainable wolf population should be perhaps 2000 animals I'm guessing. The state of Oregon only has 124. We need to refrain from any killing of wolves for some time yet.

Sincerely,

Mr. Doug Goldenberg

4345 N Shasta Loop Eugene, OR 97405-5835 adgdgz@hotmail.com

Roxann B Borisch

From: janelle.d.snyder@everyactioncustom.com on behalf of Janelle D Snyder
<janelle.d.snyder@everyactioncustom.com>
Sent: Tuesday, February 5, 2019 11:26 PM
To: odfw.commission@state.or.us
Subject: Wolf Plan Comment on Latest Revisions

Dear ODFW Commission,

I strongly oppose current revisions of the draft Wolf Conservation and Management Plan. The current changes by the Oregon Department of Fish and Wildlife do not protect our recovering wolf population, and instead, continue to weaken the Wolf Plan. For instance, killing wolves should be a last resort and the Plan should use non-lethal measures to reduce wolf-livestock conflict.

Please request that ODFW staff go back to the drawing board to bring you a plan that is scientifically justified, supported by a majority of Oregonians, and makes Oregon a new model for wolf recovery in the 21st century.

Thank you.

Sincerely,

Janelle D. Snyder, J.D.
415) 623-4088

Sincerely,
Ms. Janelle D Snyder
4915 10th Ave Sacramento, CA 95820-2207 janelle.d.snyder@gmail.com

Roxann B Borisch

From: hollandjerr@everyactioncustom.com on behalf of Gina Longo
<hollandjerr@everyactioncustom.com>
Sent: Tuesday, February 5, 2019 8:45 PM
To: odfw.commission@state.or.us
Subject: Wolf Plan Comment on Latest Revisions

Dear ODFW Commission,

I am writing to express my absolute revulsion regarding the current revisions of the draft Wolf Conservation and Management Plan.

You have the unmitigated GALL to call this atrocity a "conservation" plan? Have you actually ever consulted a dictionary to find out what the word really means? You're proposing to murder wolves. Kill wolves. Destroy wolves.

At what point do any of those equal conservation? Try total destruction.

Call it what it is, you vile thugs: the Wolf Destruction and Mismanagement Plan.

Fixed it for you.

Now LEAVE THE WOLVES ALONE!

Sincerely,
Ms Gina Longo
3520 Kangaroo Dr # 2693 Durham, NC 27705-4595 hollandjerr@gmail.com

Roxann B Borisch

From: maczorro84@everyactioncustom.com on behalf of Elizabeth McNutt <maczorro84@everyactioncustom.com>
Sent: Tuesday, February 5, 2019 5:41 PM
To: odfw.commission@state.or.us
Subject: Wolf Plan Comment on Latest Revisions

Dear ODFW Commission,

Wolf Recovery means exactly that. It means you don't kill wolves simply to livestock unless absolutely necessary because of intense overpopulation of the species. I don't think we are at that stage just yet, particularly if the majority of Oregon residents don't see killing wolves by any method as justified? Hunting them or trapping them? Now, that's not what we need, more guns in the wilderness, or more traps for unsuspecting persons hiking or otherwise using the wilderness. Don't allow livestock owners to dictate ODFW policy.

I thought we were trying to give the wolves a break. At least be sure they've gotten that break before you start eliminating them because of pressure from livestock holders.

Thank you.

Sincerely,
Mrs. Elizabeth McNutt
453 SE Lilly Ave Corvallis, OR 97333-1874 maczorro84@yahoo.com

Roxann B Borisch

From: jcbrownco@everyactioncustom.com on behalf of Margaret Brown
<jcbrownco@everyactioncustom.com>
Sent: Tuesday, February 5, 2019 4:42 PM
To: odfw.commission@state.or.us
Subject: I ask to to please give the wolf more protections, not less. This animal is vital to our world and should never be killed for absolutely no reason.

Dear ODFW Commission,

I am writing to express my strong opposition to the current revisions of the draft Wolf Conservation and Management Plan. While the word 'conservation' is in the title, it's clear that these latest revisions by the Oregon Department of Fish and Wildlife attempt to do everything but protect our recovering wolf population.

It seems that every time ODFW has an opportunity to revise the Wolf Plan, provisions are weakened even further. For example, the draft plan that was in front of the Commission in November of 2017 set a threshold of 3 in 12 months as a standard for chronic depredation (something that did not have consensus from the various stakeholders). Now, the current revisions propose 2 in 9 months -- a clear and significant erosion of protections.

Similarly, ODFW insists on incorporating public hunting and trapping into the Wolf Plan, even after public outcry, scientist input on the negative effects of hunting on social tolerance, and statewide polling which shows that a majority of Oregonians oppose it.

Finally, the proposed revisions to the Wolf Plan water-down the most important tool in the toolbox: using non-lethal measures to reduce wolf-livestock conflict. Killing wolves should truly be an option of last resort. It's important to allow enough time for effective and meaningful non lethal measures to work, however this plan undermines those efforts by merely suggesting that livestock operators use non lethal techniques, not requiring it.

Oregonians deserve a better Wolf Plan, one that results in fewer dead livestock, fewer dead wolves, and less human conflict. Unfortunately, the proposal in front of you today falls far short.

Please request that ODFW staff go back to the drawing board to bring you a plan that is scientifically justified, supported by a majority of Oregonians, and makes Oregon a new model for wolf recovery in the 21st century.

Thank you.

Sincerely,

Ms. Margaret Brown

10306 Forest Trails Dr Foristell, MO 63348-2535 jcbrownco@centurylink.net

Roxann B Borisch

From: rafepilling@everyactioncustom.com on behalf of Rafe Pilling
<rafepilling@everyactioncustom.com>
Sent: Tuesday, February 5, 2019 2:52 PM
To: odfw.commission@state.or.us
Subject: Wolf Plan Comment on Latest Revisions

Dear ODFW Commission,

I am writing to oppose the latest revisions of the Oregon Wolf Conservation and Management Plan. We are lucky enough to live in a state containing beautiful, wild, diverse ecosystems and it is our responsibility to support a healthy, natural population of all species throughout our state. In particular, I particularly oppose the amendment to allow a wolf to be killed after only two instances of conflict with livestock within a nine month period. With only 124 Oregon wolves, we must protect these creatures, not make them easier to kill.

Sincerely,

Mr. Rafe Pilling

1423 SE Rhone St Portland, OR 97202-3849 rafepilling@gmail.com

Roxann B Borisch

From: dns@everyactioncustom.com on behalf of David Stone <dns@everyactioncustom.com>
Sent: Tuesday, February 5, 2019 3:20 PM
To: odfw.commission@state.or.us
Subject: Wolf Plan is going the wrong way in the latest Revisions

Dear ODFW Commission,

Come on! You are supposed to be serious about protecting wolves. Every time you propose changes in the plan, you weaken protection for the wolves.

I am writing to express my strong opposition to the current revisions of the draft Wolf Conservation and Management Plan. While the word 'conservation' is in the title, it's clear that these latest revisions by the Oregon Department of Fish and Wildlife attempt to do everything but protect our recovering wolf population.

It seems that every time ODFW has an opportunity to revise the Wolf Plan, provisions are weakened even further. For example, the draft plan that was in front of the Commission in November of 2017 set a threshold of 3 in 12 months as a standard for chronic depredation (something that did not have consensus from the various stakeholders). Now, the current revisions propose 2 in 9 months -- a clear and significant erosion of protections.

Similarly, ODFW insists on incorporating public hunting and trapping into the Wolf Plan, even after public outcry, scientist input on the negative effects of hunting on social tolerance, and statewide polling which shows that a majority of Oregonians oppose it.

Finally, the proposed revisions to the Wolf Plan water-down the most important tool in the toolbox: using non-lethal measures to reduce wolf-livestock conflict. Killing wolves should truly be an option of last resort. It's important to allow enough time for effective and meaningful non lethal measures to work, however this plan undermines those efforts by merely suggesting that livestock operators use non lethal techniques, not requiring it.

Oregonians deserve a better Wolf Plan, one that results in fewer dead livestock, fewer dead wolves, and less human conflict. Unfortunately, the proposal in front of you today falls far short.

Please request that ODFW staff go back to the drawing board to bring you a plan that is scientifically justified, supported by a majority of Oregonians, and makes Oregon a new model for wolf recovery in the 21st century.

Thank you.

Sincerely,
Mr David Stone
1155 HIDEAWAY Ct Eugene, OR 97401
dns@efn.org

Roxann B Borisch

From: elfio@everyactioncustom.com on behalf of Elizabeth Flake
<elfio@everyactioncustom.com>
Sent: Tuesday, February 5, 2019 3:41 PM
To: odfw.commission@state.or.us
Subject: Wolf Plan Comments

Dear ODFW Commission,

The people and wildlife of Oregon deserve better. I am strongly opposed to the current revisions of the draft Wolf Conservation and Management Plan. While the word 'conservation' is in the title, it's clear that these latest revisions by the Oregon Department of Fish and Wildlife attempt to do everything but protect our recovering wolf population. Oregon has the opportunity to set an example for the nation in keeping with our values.

It seems that every time ODFW has an opportunity to revise the Wolf Plan, provisions are weakened even further. For example, the draft plan that was in front of the Commission in November of 2017 set a threshold of 3 in 12 months as a standard for chronic depredation (something that did not have consensus from the various stakeholders). Now, the current revisions propose 2 in 9 months -- a clear and significant erosion of protections.

Similarly, ODFW insists on incorporating public hunting and trapping into the Wolf Plan, even after public outcry, scientist input on the negative effects of hunting on social tolerance, and statewide polling which shows that a majority of Oregonians oppose it.

Finally, the proposed revisions to the Wolf Plan water-down the most important tool in the toolbox: using non-lethal measures to reduce wolf-livestock conflict. Killing wolves should truly be an option of last resort. It's important to allow enough time for effective and meaningful non lethal measures to work, however this plan undermines those efforts by merely suggesting that livestock operators use non lethal techniques, not requiring it.

Oregonians deserve a better Wolf Plan, one that results in fewer dead livestock, fewer dead wolves, and less human conflict. Unfortunately, the proposal in front of you today falls far short.

Please request that ODFW staff go back to the drawing board to bring you a plan that is scientifically justified, supported by a majority of Oregonians, and makes Oregon a new model for wolf recovery in the 21st century.

Thank you.

Sincerely,
Ms Elizabeth Flake
25 Eugene St Hood River, OR 97031-2215
elfio@yahoo.com

Roxann B Borisch

From: jccole86@everyactioncustom.com on behalf of John Cole <jccole86@everyactioncustom.com>
Sent: Tuesday, February 5, 2019 4:05 PM
To: odfw.commission@state.or.us
Subject: Wolf Plan Comment on Latest Revisions

Dear ODFW Commission,

I am writing to express my strong opposition to the current revisions of the draft Wolf Conservation and Management Plan. While the word 'conservation' is in the title, it's clear that these latest revisions by the Oregon Department of Fish and Wildlife attempt to do everything but protect our recovering wolf population. And the wolf population should be protected, as the wolf embodies the principles of the American spirit--strongly social, yet fiercely independent.

Oregonians, and Americans, deserve a better Wolf Plan, one that results in fewer dead livestock, fewer dead wolves, and less human conflict. Unfortunately, the proposal in front of you today falls far short.

Please request that ODFW staff go back to the drawing board to bring you a plan that is scientifically justified, supported by a majority of Oregonians, and makes Oregon a new model for wolf recovery in the 21st century.

Thank you.

Sincerely,
Mr. John Cole
68 Sterling Cir Apt 107 Wheaton, IL 60189-2123 jccole86@yahoo.com

Roxann B Borisch

From: mkwoodall@everyactioncustom.com on behalf of Marian Woodall
<mkwoodall@everyactioncustom.com>
Sent: Tuesday, February 5, 2019 4:12 PM
To: odfw.commission@state.or.us
Subject: Wolf Plan Comment on Latest Revisions

Dear ODFW Commission,

Leave the wolves alone, please.

Thank you.

Sincerely,
MS Marian Woodall
21753 Boones Borough Dr Bend, OR 97701-8820 mkwoodall@bendcable.com

Roxann B Borisch

From: jack.istok@everyactioncustom.com on behalf of Jonathan Istok
<jack.istok@everyactioncustom.com>
Sent: Tuesday, February 5, 2019 4:31 PM
To: odfw.commission@state.or.us
Subject: Wolf Plan Comment on Latest Revisions

Dear ODFW Commission,

I am writing to express my strong opposition to the current revisions of the draft Wolf Conservation and Management Plan.

if you review the numbers from the usda, for every one animal killed by a wolf, hundreds starve to death or are hit by cars on open range.

pay the rancher for any wolf killed animals..but stop killing wolves

Sincerely,

Dr Jonathan Istok

6425 NW Oak Creek Dr Corvallis, OR 97330-3015 jack.istok@oregonstate.edu

Roxann B Borisch

From: edm_austin@everyactioncustom.com on behalf of David Michalek
<edm_austin@everyactioncustom.com>
Sent: Tuesday, February 5, 2019 4:40 PM
To: odfw.commission@state.or.us
Subject: Wolf Plan Comment on Latest Revisions

Dear ODFW Commission,

To say I strongly oppose the current revisions of the draft Wolf Conservation and Management Plan is an understatement.

Under no circumstances should any such bill or change be considered.

Protect what little wildlife we have left.

Sincerely,
Mr. David Michalek
25 Eugene St Hood River, OR 97031-2215
edm_austin@yahoo.com

Roxann B Borisch

From: puttytwist@everyactioncustom.com on behalf of Suzanne Moulton
<puttytwist@everyactioncustom.com>
Sent: Tuesday, February 5, 2019 5:40 PM
To: odfw.commission@state.or.us
Subject: Do NOT allow Wolf Hunting in Oregon!

Dear ODFW Commission,

I am a wildlife artist and have dedicated the 1.5 years to helping people understand the value of the wolf in our modern world.

I oppose the current revisions of the draft Wolf Conservation and Management Plan.

Why do I strongly support Wolf Reintroduction? Wolves are key to keeping our forests healthy, and healthy forests are where our fresh water supplies come from. With the Climate Crisis we must prioritize protecting our forests and fresh water! Decimating our forests and the animals that maintain them is short sighted!

How do wolves help manage our forests? Wolves keep elk and deer populations on the move so that forest undergrowth is kept down helping to reduce intensity of forest fires. Keeping elk and deer populations on the move also benefits our beavers- an animal that plays an important role in creating our fresh water supply. Wolves also keep elk and deer healthy, alert and from sitting around and eating up hay stores meant for cattle.

How do you address the concerns of the cattle industry?

1- Don't allow clear cutting near cattle grazing lands. Clear cutting hurts grazing lands and disrupts/destroys elk and deer habit and scares off those animals from those lands for many years, thus forcing wolves to turn to cattle as a food source.

2- consider that wolves target sick and weak animals. Wolves can even detect cancer. Any given year, about 30,000 cattle die from disease or falls state wide as compared to maybe 15 cattle killed by wolves. Although any loss of cattle is hard for the small rancher, those losses are most likely of diseased animals. I for one would be glad to not eat beef that came from cattle with cancer!

3- Mandate and support non-lethal Wolf deterrent programs. There are some promising wolf defensive howl programs (using recorded and played back wolf sounds) being deployed in Europe that are showing more effectiveness and easier to deploy for ranchers. We should be developing this type of non-lethal deterrent program to manage and contain wolf territory and ranch land boundaries along side existing non-lethal deterrent practices (many of which are offered for free to ranchers by several conservation groups).

4- Wolf Education and co-existence. Communities need to feel safe in wolf country. Many people still think all wolves are rabid animals, these are outdated beliefs from the Dark Ages. Communities need to understand real wolf behavior in order be safe and not prejudice based on myths.

Issues with public hunting and trapping of wolves: how is the ODFW going to ensure hunters kill the correct wolves? Also wolf packs function like families- pups learn from adults what to hunt. If the alphas and adults (mom, dad, aunties and uncles) are killed off, the "teenagers" have no-one to guide them to hunt their natural prey.

ODFW insists on incorporating public hunting and trapping into the Wolf Plan, even after public outcry, scientist input on the negative effects of hunting, and statewide polling which shows that a majority of Oregonians oppose it.

Killing wolves should truly be an option of last resort. It's important to allow enough time for effective and meaningful non lethal measures to work, however this plan undermines those efforts by merely suggesting that livestock operators use non lethal techniques, not requiring it. Remeber there are about 1.5 million head of cattle in the state of Oregon vs. a little over 200 individual wolves.

Oregonians deserve a better Wolf Plan, one that results in fewer dead livestock, fewer dead wolves, and less human conflict. Unfortunately, the proposal in front of you today Will cause more harm on all these fronts.

Please request that ODFW staff go back to the drawing board to bring you a plan that is scientifically justified, supported by a majority of Oregonians, and makes Oregon a new model for wolf recovery in the 21st century. Our forests, fresh water resources and fighting the Climate Crisis all depend on it!

Thank you.

Sincerely,

Ms. Suzanne Moulton

1325 W Powell Blvd Gresham, OR 97030-6836 puttytwist@yahoo.com

Roxann B Borisch

From: jimsteitz@everyactioncustom.com on behalf of Jim Steitz
<jimsteitz@everyactioncustom.com>
Sent: Tuesday, February 5, 2019 7:54 PM
To: odfw.commission@state.or.us
Subject: Draft Wolf Plan is Suppression and Eradication, not Conservation

Dear ODFW Commission,

***Contrary to the pretense of the draft plan, 124 animals is not sufficient to justify a general hunting or trapping, and does not reflect an ecologically appropriate presence of this vital top carnivore. Even worse, the plan again defers to the imaginary supremacy of ranchers to enjoy a landscape free of predators, even without initial steps at non-lethal deterrence, as manifested by the plan's relegation of the prerequisite to a 'suggestion.' No rancher will act on a 'suggestion' to solve a 'problem,' when state firepower is soon promised to solve the 'problem' instead.

The Gray Wolves have a right to exist in the lands they have inhabited for eons before human memory. At present, they occupy only a tiny fraction of their historic Oregon range, and landscapes are suffering an ecological deficit in the absence of this key top predator. Oregon must not bring upon ourselves the moral stain of excluding a majestic creature with eons of prior, senior rights to this landscape. The return of wolves should be welcomed and facilitated as the restoration of a long-lost ecological lynchpin at the top of the trophic pyramid, not a nuisance to be contained.

The Fish and Wildlife Commissions's slavish, unquestioning deference to the marginal convenience of self-absorbed ranchers, expressed through the death of Oregon's top carnivore, is unbecoming a morally and ecologically decent state. These people who enjoy the extraordinary privilege of running their livestock over the Oregon mountains and deserts are recent visitors. These precious and iconic fellow mammals enjoy a prior and superior right to their ancestral home. The ranchers are obligated to conform their habits and demands to the survival imperatives of the wolves, and have no right to invoke government firepower and harassment of these wolves for their parochial, petty financial interests.***

I am writing to express my strong opposition to the current revisions of the draft Wolf Conservation and Management Plan. While the word 'conservation' is in the title, it's clear that these latest revisions by the Oregon Department of Fish and Wildlife attempt to do everything but protect our recovering wolf population.

Roxann B Borisch

From: bbrister@everyactioncustom.com on behalf of Bob Brister
<bbrister@everyactioncustom.com>
Sent: Tuesday, February 5, 2019 8:40 PM
To: odfw.commission@state.or.us
Subject: Wolf Plan Comment

Dear ODFW Commission,

I strongly oppose the current revisions of the draft Wolf Conservation and Management Plan. The Wolf Plan should increase protection of our recovering wolf population, not weaken protections.

Recreational hunting and trapping of wolves is both unethical and counterproductive of the goal of reducing wolf/human conflict. Allowing the hunting of wolves sends the message that illegal killings are not such a bad thing.

Non-lethal measures to reduce wolf-livestock conflict are what is indicated, not sport hunting. Livestock operators should be required to use non lethal techniques to reduce deprivations.

Oregon should lead the way in producing a scientifically defensible and humane wolf policy.

Thank you for considering my comments.

Sincerely,

Mr. Bob Brister

220 S Elizabeth St Apt 12 Salt Lake City, UT 84102-2540 bbrister@q.com

Roxann B Borisch

From: mayfair44@everyactioncustom.com on behalf of James Fenner <mayfair44@everyactioncustom.com>
Sent: Tuesday, February 5, 2019 8:53 PM
To: odfw.commission@state.or.us
Subject: Comments on the Latest Revisions to the "Wolf Plan"

Dear ODFW Commission,

As a "native born" Oregonian, avid angler, and extensive user of Oregon's "Wild" places, I--once again!--strongly oppose the latest revisions to the draft Wolf Conservation and Management Plan. My previous objections did not seem to hold any value, as the latest revisions still contain the same objectionable sections. So, here we go again:

Although the draft document gives lip service to the idea of "conservation" by using the word "conservation" in the title, these latest revisions to the draft Wolf Conservation and Management Plan appear to do just about anything and everything not to protect Oregon's minimally recovering wolf population. To me, for one, it seems like every time the Oregon Department of Fish and Wildlife (ODFW) revises the draft Plan, it uses the revision process as an opportunity to weaken the already meagre protections even further. For example, the draft plan from November of 2017 set a threshold of three "depredation events" in twelve months as a standard for "chronic depredation," the current revisions propose lowering this standard to two events in nine months, an obvious erosion of protections.

Similarly, it appears to me that ODFW continues to try to incorporate public and private hunting and trapping into the Wolf Plan, even after (1) a significant public outcry occurred; (2) scientist input outlined the negative effects of hunting; and (3) statewide polling indicated that a significant majority of Oregonians oppose it.

Lastly, the latest revisions to the Plan reduces the most useful and important management tool, that of using non-lethal measures to reduce wolf-livestock conflict as the required first resort. Previously, lethal means--i.e. killing wolves--was allowed only after using non-lethal measures (plural!). And killing rightly and truly should be an option of last resort. However this plan undermines those efforts by merely "suggesting" that non-lethal methods be used first, but does not require them to be used before killing wolves.

All Oregonians deserve a better Wolf Plan than this latest draft! We need--and want--a Plan that yields both fewer dead livestock and fewer dead wolves, as well as ensuring less human conflict. In my opinion, the latest revised draft falls far short. You should reject it.

Please reject this draft and require--not just request--ODFW staff revise it to improve, rather than weaken, wolf conservation. Require them to present you with a plan that is (1) scientifically justified, (2) supported by a majority of Oregonians, and (3) one that will make Oregon a model for wolf recovery in the 21st century.

Thank you in advance.

James H Fenner, PhD, PE
Colonel, USAF (Ret)

Sincerely,
Prof James Fenner
5765 Windfield Loop Lake Oswego, OR 97035-2203 mayfair44@comcast.net

Roxann B Borisch

From: Lee and Eitan Zucker <lee@thelocomotive.com>
Sent: Wednesday, February 6, 2019 12:49 PM
To: odfw.commission@state.or.us
Subject: No, No, No to Endangering Oregon's Wolves!

ODFW Commissioners
Oregon Department of Fish and Wildlife

RE: No, No, No to Endangering Oregon's Wolves!

Dear ODFW Commissioners,

Dear Commissioners:

I'm writing on behalf of my family--including 7 voting, tax-paying adults: We are all extremely concerned about the Department of Fish and Wildlife's proposal for Oregon's wolves. We are deeply opposed to the proposed focus on killing wolves to address livestock depredations. Not only are ranchers already being compensated for their losses, but recent studies have continued to show that killing wolves is ineffective at curbing livestock losses or preventing future conflict. It is purely retribution and has no place in state policy aimed at resolving these issues in the most efficient and effective way possible.

We request that you reject the current proposal; we and ask the agency to refocus its efforts on a plan that prioritizes non-lethal, preventive measures. These have proven to be the most cost-efficient and effective means at curbing livestock losses and preventing future conflict.

Please resist sticking to what is familiar: Although a focus on conflict prevention might require more work and coordination by the Department, it is a system that commits livestock producers to proven conflict-prevention measures.

Sincerely,
Lee and Eitan Zucker
1966 orchard st.
eugene, OR 97403

Roxann B Borisch

From: dylankhh@everyactioncustom.com on behalf of Dylan Huber-Heidorn
<dylankhh@everyactioncustom.com>
Sent: Wednesday, February 6, 2019 8:36 PM
To: odfw.commission@state.or.us
Subject: Wolf Plan Comment on Latest Revisions

Dear ODFW Commission,

Please keep what we know about the importance of predators to healthy ecosystems at the heart of your work. If we need better systems in place to compensate ranchers, I hope we can make that a bigger part of the discussion. Never forget what you love about working in wildlife fields.

Sorry you have to put up with crap from so many sides at once.

I object to any weakening of the rules that protect our fledgling wolf populations.

Sincerely,
Mr. Dylan Huber-Heidorn
1284 Horn Ln Eugene, OR 97404-2983
dylankhh@gmail.com

Roxann B Borisch

From: leslieburpo1@everyactioncustom.com on behalf of Leslie Burpo <leslieburpo1@everyactioncustom.com>
Sent: Wednesday, February 6, 2019 12:11 PM
To: odfw.commission@state.or.us
Subject: Liar, Liar, Pants on Fire!!

Dear ODFW Commission,

I sympathize with the ranchers' families. I know what it is like to have predators taking your livestock and pets. I don't like it any more than the ranchers do.

But extensive use of non-lethal alternatives should be legally required before lethal means are employed.

It is the ODFW's pretense of conservation, while blatantly pandering to a minority of Oregonians, that is the most unsettling.

This kind of thumbing your nose at us is not a good look for ODFW.

The more that ODFW gives lip service to respecting the protection of the wolves, but shows allegiance only to a small but powerful group, the more I want to dig in my heels on every single decision they make. Put the brakes on them, because if we can't trust ODFW to keep their word on this most public matter of the wolves, how can we help but conclude that they are probably sneakily doing whatever they want on other issues whenever it suits them?

This is how you create divisive and extreme positions among the public: You say you care about the opinions of the people but then carry on as though we don't even exist.

I am strongly opposed to the current revisions of the draft Wolf Conservation and Management Plan.

I've noticed, as have others, that every time ODFW revises the Wolf Plan, they weaken the provisions. As if no one will cry foul.

I am not happy that ODFW is encouraging more hunting and trapping. I live where the gunfire never stops, where day and night, trappers and hunters traipse over the hills with no consideration for the people and animals that actually live here.

Hunting is hell on the occupants of the wild lands. My life, my family's life, and my livestock's lives have been endangered over and over again by hunters.

I would gladly pay a high tax to ODFW if they would be less obsessed with the money they receive from hunting-associated fees, and care more about actual fish, wildlife, and human beings that live in the wild lands.

And most problematic: The obstacle that underlies this entire battle is that there are people who enjoy killing. They are the ones that always find an excuse to push lethal means to the top of any list of control methods.

People who dislike killing will make the effort to find non-lethal ways to protect their flocks and families. Non-lethal predator control takes more time and effort, but it is the right way to go.

I have used non-lethal means to drive the coyotes off my land. It is difficult, but it is effective. You can drive off the predators, and respect them at the same time.

Good solutions are often complex and require effort. Sure, it seems easier to just pull a trigger to make all your problems go away. But that is a chilling, irresponsible, and irreversible way to solve a problem. How many sad stories begin that way.

Some people are just lazy. In those cases, only legal requirements will bring them to do the right thing.

Some people are truly scared, but education can go a long way to help them learn non-lethal means to deal with predators.

But it is the people who actually enjoy lethal solutions that I suspect are driving this plan to ignore the opinions of the majority of Oregonians.

And for ODFW to ignore their obligation to serve all the people of Oregon, and to instead cater to the lazy, the uneducated, and worst of all, the violent individuals that don't want another way- that is not right.

And that is a crime.

Please request that ODFW staff go back to the drawing board to bring you a plan that is scientifically justified, supported by a majority of Oregonians, and makes Oregon a new model for wolf recovery in the 21st century.

Thank you.

Sincerely,
Mr. Leslie Burpo
28577 Hamm Rd Eugene, OR 97405-9740
leslieburpo1@gmail.com

Roxann B Borisch

From: dschlenoff@everyactioncustom.com on behalf of Debbie Schlenoff
<dschlenoff@everyactioncustom.com>
Sent: Thursday, February 7, 2019 11:37 AM
To: odfw.commission@state.or.us
Subject: We need a wolf plan that is stronger on wolf conservation

Dear ODFW Commission,

Wolves are an important part of ecosystems and their presence has been shown to improve biodiversity in a region and keep destructive meso-predators such as coyotes under control. The impact of wolves on livestock is very small compared to other threats such as coyotes and exposure. Pro-active measures and non-lethal wolf control do work to protect livestock.

Please revise the Wolf Management Plan to protect wolves and promote non-lethal measures of control.

I am strongly opposed to the current revisions of the draft Wolf Conservation and Management Plan. While the word 'conservation' is in the title, it's clear that these latest revisions by the Oregon Department of Fish and Wildlife attempt to do everything but protect our recovering wolf population.

It seems that every time ODFW has an opportunity to revise the Wolf Plan, provisions are weakened even further. For example, the draft plan that was in front of the Commission in November of 2017 set a threshold of 3 in 12 months as a standard for chronic depredation (something that did not have consensus from the various stakeholders). Now, the current revisions propose 2 in 9 months -- a clear and significant erosion of protections.

Similarly, ODFW insists on incorporating public hunting and trapping into the Wolf Plan, even after public outcry, scientist input on the negative effects of hunting on social tolerance, and statewide polling which shows that a majority of Oregonians oppose it.

Finally, the proposed revisions to the Wolf Plan water-down the most important tool in the toolbox: using non-lethal measures to reduce wolf-livestock conflict. Killing wolves should truly be an option of last resort. It's important to allow enough time for effective and meaningful non lethal measures to work, however this plan undermines those efforts by merely suggesting that livestock operators use non lethal techniques, not requiring it.

Oregonians deserve a better Wolf Plan, one that results in fewer dead livestock, fewer dead wolves, and less human conflict. Unfortunately, the proposal in front of you today falls far short.

Please request that ODFW staff go back to the drawing board to bring you a plan that is scientifically justified, supported by a majority of Oregonians, and makes Oregon a new model for wolf recovery in the 21st century.

Thank you.

Sincerely,
Dr. Debbie Schlenoff
PO Box 51347 Eugene, OR 97405-0906
dschlenoff@msn.com

Roxann B Borisch

From: Mark Whitham <markwhitham97701@gmail.com>
Sent: Thursday, February 7, 2019 1:53 PM
To: odfw.commission@state.or.us
Subject: Wolf Plan

Dear Commissioners:

Please reject the wolf plan as revised in its present form. The ODFW has rejected all of the conservative suggestions while they were participating in the facilitated meeting. Demand that ODFW use science not the lobbying of the livestock and hunting industry to guide the wolf recovery during this critical period. This commission rejected the best science and experts in removing the wolf from ESA listing in Eastern Oregon. I have not heard one new non-lethal control method that has been incorporated as part of this plan, while decreasing the threshold for lethal measure. I have asked ODFW to look at a range rider program as a non-lethal deterrent. Surely there are cleaver implementation methods we could use to afford this non-lethal control. Why are we killing wolves that predate on public land, this is every bodies land, not just the livestock industry, that is where wolves should be able to live.

I urge you to reject this revised wolf plan as written and demand that ODFW seriously consider the input of the conservation groups that participated in the facilitated meeting.

Thank you for your time.

Mark Whitham
503-298-1893

Roxann B Borisch

From: kfunk203@everyactioncustom.com on behalf of Kathryn Funk <kfunk203@everyactioncustom.com>
Sent: Friday, February 8, 2019 4:50 PM
To: odfw.commission@state.or.us
Subject: Wolf Latest Revisions are short sighted and antiquated

Dear ODFW Commission,

I am writing to express my strong opposition to the current revisions of the draft Wolf Conservation and Management Plan. Wolves are a natural part of life, and have an important impact on the health of the rivers and forests on which humans depend for air to breath, water to drink, and food to eat, as well keeping populations of other animals in balance.

It is sad to me that with the continued decline in health, mental and physical, of the American population over my life time that to proposed solutions to problems continues to be to kill. We kill germs, insects, plant, etc., all the while we get weaker. Learning to live with the environment around us, rather than destroy what causes a short-term discomfort or pain, will create more creative and vibrant population. We all take on losses-be it some of our herd being thinned, the company that employs us going out of business, or suffering a car accident. Rather than slaughter a species that is living on the edge, consider reducing our impact on them. The natural world has a way of maintaining balace - with a give and take. Semi-trucks have been known to take out cattle who have wondered into the road, and there has been no call for reducing the number of semi trucks. Please refuse the current proposal of the Wolf plan. Wait until a plan is created that can support non-leathal measures to protect one of natures important resources-the predator that keeps balace-the wolf.

A thriving wilderness with biological diversity is the greatest gift to the planet, and the most beneficial legacy to offer the generations to come. Saving the wolf population is key to making this planet healthy for the future.

Sincerely,
Ms Kathryn Funk
1701 NE Wells Acres Rd Bend, OR 97701-5833 kfunk203@yahoo.com

Roxann B Borisch

From: Fearnofish84@everyactioncustom.com on behalf of Aarron Schmidt <Fearnofish84@everyactioncustom.com>
Sent: Saturday, February 9, 2019 5:42 PM
To: odfw.commission@state.or.us
Subject: Wolf Plan Comment on Latest Revisions

Dear ODFW Commission,

I support any ideas that will manage wolf numbers..Please allow us to hunt wolves to manage their numbers and protect our herds

Sincerely,

Mr. Aarron Schmidt

1889 N Davis St Cornelius, OR 97113-8708 Fearnofish84@aol.com

Roxann B Borisch

From: kpottermom@everyactioncustom.com on behalf of Dave Potter
<kpottermom@everyactioncustom.com>
Sent: Sunday, February 10, 2019 12:07 PM
To: odfw.commission@state.or.us
Subject: Wolf Plan Comments

Dear ODFW Commission,

With a degree in wildlife biology [Washington State, BS, 1968] and over 32 years of wildlife management field experience [Refuge & Wetland District Manager, GS-14, US Fish & Wildlife Service] please accept my comments on our wolf management plan.

Based on my wildlife management experiences, I understand how "hot" and complex wolf management planning is and shall continue to be. Thanks for your good efforts so far!

a] Plan needs to better state that wolves are very important on the landscape both environmentally and socially. Some 70% of us Oregonians want healthy wolf populations in Oregon. The current draft plan seems significantly slanted to meeting the wants of the minority of Oregonians, mostly the ranching communities. This needs to be corrected to reflect the desires of the increasing majority of your constituents.

b] Plan needs to better set distinctions between wolves on public lands and on private lands. Again, most Oregonians feel wolves have a firm right to live on national and state forest and range lands. Plan needs to clearly establish that wolves' right to live on public lands is much more valid - and higher use priority - than the right of ranchers to graze livestock on public lands. The plan needs to allow wolf killing on public lands only after the most complete and thorough efforts have been expended by the rancher and ODFW to stop specific wolves from killing domestic animals grazing on public lands.

c] Plan must clearly establish that wolves may and will be managed as game animals once stable, established populations become established. And that wolves are not "varmints" subject to widespread, indiscriminate "predator control" efforts such as poison baits, coyote getters, etc. Plan must clearly state that wolf management as a game animal may or may not include sport hunting by permit only [with every killed wolf submitted for ODFW inspection.] Plan should establish that a large percentage of all wolf hunting permits shall be designated as wolf management funding permits and "sold" to the highest bidders - all proceeds going into wolf depredations or other wolf management efforts.

d] Plan must state that wolf trapping shall not be allowed on public lands and will only be allowed due to wolf depredations as a last resort on private lands. "Last resort" defined in the Plan as efforts taken after rancher and ODFW nonlethal management efforts have been fully implemented without success.

e] Plan should allow ODFW to establishment a wolf conservation print and stamp public program to raise funds only for wolf management efforts.

Sincerely,

Mr. Dave Potter

3930 Rio Vista Way Klamath Falls, OR 97603-7729 kpottermom@yahoo.com

Roxann B Borisch

From: Goat Hunter <goathunter.oregon@gmail.com>
Sent: Sunday, February 10, 2019 10:35 AM
To: odfw.commission@state.or.us
Subject: Wolf Plan Comments

Dear ODFW Commission,

I am writing to express my support of the current draft of the Oregon Wolf Plan. I believe the plan balances wolf recovery with livestock producer interests in a science-based approach. As our wolf numbers continue to increase, regulated hunting needs to be utilized as a population management tool and I hope we see the day where wolves are so plentiful that they can be managed the same as bears and cougars, without the need for endangered species protection. Thank you for sticking to a science-based approach in our journey to wolf recovery.

Sincerely,

--MATT

Matt Alford
goathunter.oregon@gmail.com
39360 SW Laurelwood Road
Gaston, OR 97119

Member: BHA, RMEF, DU, OHA

Roxann B Borisch

From: johnm0416@everyactioncustom.com on behalf of John Michaels <johnm0416@everyactioncustom.com>
Sent: Sunday, February 10, 2019 9:17 PM
To: odfw.commission@state.or.us
Subject: Wolf Plan Comment on Latest Revisions

Dear ODFW Commission,

Dear members:

I would like you all to PLEASE leave in place the current protections for wolves here in Oregon.

I realize that predation is a fact, but the occurrences are pretty infrequent and the cost light.

Wolves are led by their older members and therefore CULLING should be a LAST RESORT.

The death of a alpha member can jeopardize the puppies and other pack members and lead to suffering from starvation, which is a horrible way to die for humans and also other mammals such as wolves.

These are our beloved dogs' ancestors.

I can't imagine my dog alone in the Oregon wilderness dying from starvation: wolf pups and younger members are no different and they could suffer likewise.

Let's add more protection not fewer.

Thank you.

John Micheals

Sincerely,
Mr. John Michaels
PO Box 1793 Lake Oswego, OR 97035-0524
johnm0416@yahoo.com

Roxann B Borisch

From: turtleislandearth@everyactioncustom.com on behalf of Ender Black
<turtleislandearth@everyactioncustom.com>
Sent: Monday, February 11, 2019 6:04 PM
To: odfw.commission@state.or.us
Subject: Wolf Plan Comment on Latest Revisions

Dear ODFW Commission,

Please,

I urge you,

The protection of native beings such as wolves and our precious ecosystems must be our number 1 priority. Human activity and expansion has wreaked havoc on the planet, but it's far from late, we are at the right place in time to remember the ancient understandings of Mother Earth.

With much love,

Sincerely,

Mr Ender Black

2152 NE Wasco St Portland, OR 97232-1619 turtleislandearth@gmail.com

Roxann B Borisch

From: Bill Sweeney <sweeneyman13@gmail.com>
Sent: Wednesday, February 13, 2019 6:07 PM
To: odfw.commission@state.or.us
Subject: WOLF CONSERVATION AND management Plan

Im asking you as a native Oregon to support the revised wolf plan on march 15th.
As a sportsman i have already compromised by accepting wolves in our state.
My acceptance of wolves is based on responsible wolf management plans that considers all interest of oregon citizens, including maintaining hunting opportunity for deer and elk.
My son grew up hunting Dead Horse ridge out of Joseph in the imnha unit, since Introducing wolves in North East Oregon the deer population has plummeted. With proper management we can reverse these results.
Please approve the revised Wolf Conservation and MANAGEMENT PLAN BEST BILL

Sent from my iPad

Roxann B Borisch

From: jeff heller <smokey4269@hotmail.com>
Sent: Thursday, February 14, 2019 7:19 AM
To: odfw.commission@state.or.us
Subject: Wolve Management

The founding fathers of the State of Oregon from the beginning recognize there is not enough room for Wolves in Our State without constant conflicts. How are the elk populations doing in areas with them? The agenda to introduce wolves is ludicrous and has ODFW at a all time low .please bring back the bounty and allow Sportsman to rid Oregon Of this plague.eco terrorism at it finest.

Get [Outlook for Android](#)

Roxann B Borisch

From: Maggy and Steve Wilcox <wilcox5@yahoo.com>
Sent: Thursday, February 14, 2019 8:19 PM
To: odfw.commission@state.or.us
Subject: Wolves

Dear Sir or Madam,

As an Oregon hunter and OHA member, I believe that wolves should be scientifically managed, as are other predator and pray animals. The boom and bust cycle, which has begun a downward trend for deer and elk, will benefit neither the wolf nor the ungulate.

Please do not be swayed by the passions of uninformed people. They may have both loud voices and, for those elected, votes bu,t with this issue especially, we should be supporting the well being of all our wild animals.

Best regards,

Stephen Wilcox

Roxann B Borisch

From: animals@everyactioncustom.com on behalf of Paige Powell
<animals@everyactioncustom.com>
Sent: Thursday, February 14, 2019 10:53 AM
To: odfw.commission@state.or.us
Subject: SAVE OUR OREGON WOLVES and STOP BARBARIC LEG TRAP HOLDS, POISONING and OTHER TERRORIST TYPES OF KILLING

Dear Chair Michael Finley,

Dear Mr. Melcher, Mr. Finley and the ODFW Commission Members,

As a fifth generation Oregonian I am SO ASHAMED of the way the OFWC treats our native animals! Please wake up to humane methods to help our wildlife especially our noble and beautiful wolves, coyotes, big cats, elk, beavers, etc.

The Oregon Department of Fish and Wildlife's proposed Wolf Management Plan is not only weaker than previous drafts, but fails to represent the values of Oregonians. It appears that ODFW's intention is to find ways to kill wolves faster, not prioritize conflict prevention through non-lethal measures. Oregonians - and wolves - deserve a plan based in science, one that is reflective of Oregon's conservation values, and one that prioritizes using non-lethal measures as a way to reduce conflict. Ultimately, this approach would result in fewer dead livestock, fewer dead wolves, and less human conflict.

We urge you to focus on prioritizing meaningful, transparent, enforceable, and effective non-lethal measures and only allow wolves to be killed in active defense of livestock. Additionally, we urge you to reform and drastically increase funds for an existing program that compensates livestock operators to fund non-lethal conflict prevention work and mitigate any potential economic impacts caused by wolves.

Oregonians deserve a science-based plan that leads to less conflict and less killing. Not long ago, Oregon set a standard for the rest of the nation. Under previous ODFW plans, Oregon's wolf population grew while livestock loss, wolf killing, and other conflict dramatically decreased. We urge you to find a way for humans and wolves to co-exist peacefully once again.

Thank you

Sincerely,

Mrs. Powell

Sincerely,

Paige Powell

2653 SW Talbot Rd Portland, OR 97201-1668

Roxann B Borisch

From: Brian Ray <bray@nheri.org>
Sent: Tuesday, February 19, 2019 4:52 PM
To: odfw.commission@state.or.us
Cc: oha@oregonhunters.org; jim@oregonhunters.org; 'Todd Nash'; oca@orcattle.com
Subject: Revised Wolf Conservation Management Plan

Dear Commissioners,

Please approve the revised Wolf Conservation Management Plan.

I have carefully followed the challenge of how to manage wolves and protect ungulates in Oregon. Hunting wolves -- soon -- must stay in the picture.

Sportsmen and sportswomen have already been compromising by accepting the presence of wolves in Oregon. We do not need them here, environmentally or for any other reason.

For context: I have a B.S. in biology, M.S. in zoology, and a Ph.D. in science education (from Oregon State University, 1988). I have been an "animal lover" since I was a little boy. I am a naturalist, environmentalist, outdoorsman, small-acreage farmer, former science teacher in schools and colleges, and hunter. I am still an "animal lover."

It might be a good idea to have a very few, under 30, wolves in Oregon. If anything, hunting wolves should come into play sooner than later. They are canids and they breed fast and successfully; they are under no threat of endangerment. I have watched wolves hunting and harassing elk in northeast Oregon, too many times.

This compromise of having a few wolves in Oregon is based on a responsible management plan that takes into account the interests of all Oregonians, including solid hunting opportunity of deer and elk. Not only is hunting a fine tradition in Oregon but it brings many economic benefits to communities all around the state.

Also, livestock producers are bearing the greatest burden due to wolf depredation on their animals, our food. They need this wise Wolf Management Plan.

(Related note: I have hunted elk in Idaho, about 5 years ago, and witnessed first-hand the overly deleterious effects of too many wolves on the elk population in one of the traditionally best places to have opportunities to see or hunt elk. I have talked with Oregon ranchers and heard believable accounts of bad livestock depredation.)

I have seen and heard wolves in Oregon during the past few years. Yes, it is enjoyable but we need only a very few wolves in Oregon. We do not need them to "keep the ecosystem in balance" as some claim. We now have plenty in Oregon. They are canids and, therefore, breed like dogs. We do not need any more wolves killing deer, elk, cattle, sheep, and other animals.

Please call on me at any time.

--Brian

Brian D. Ray, Ph.D.

Salem OR 97317

phone (503) 364-1490.

fax (503) 364-2827.

www.nheri.org

Brian Ray, only research & personal bray@nheri.org

Roxann B Borisch

From: Kathy <kathnzz@yahoo.com>
Sent: Thursday, February 21, 2019 1:29 PM
To: odfw.commission@state.or.us
Subject: Wolf Conservation and Management Plan

Dear Fish and Wildlife Commissioners,

I recently learned that your mission is "To protect and enhance Oregon's fish and wildlife and their habitats for use and enjoyment by present and future generations." I wanted to remind the Commission of this mission while you develop the Wolf Plan. I realize you have postponed public comment on the Wolf Plan draft; however, I feel compelled to share my thoughts while you are still working on this draft. Once the draft is finalized, I realize it is only a matter of time until the draft is adopted - please take into account what the majority of Oregonians want regarding this Plan while there is still time to revise it.

I recently researched how many heads of cattle are in Oregon and various statistics approximate the population at 3.9M in 2018. This is up from 1.2M in 2014. What a huge increase. We need to make room for our natural wildlife. How many known wolves live in Oregon? Approximately 124. These statistics are a sobering reminder of the sad state of our wildlife and in particular, an apex predator so crucial to a healthy ecosystem. We must get beyond the "old school" 1800s version of wildlife management and move toward coexistence and reap the rewards of a functioning environment where we do not shoot anything that scares us.

I realize wolf management is a contentious issue, particularly among ranchers, but poll after poll shows the majority of Oregonians want proactive, non-lethal tools to reduce conflict between wolves and livestock. The public does not want wolves to be killed.

You must develop a Wolf Plan that has **enforceable non-lethal measures** with no hunting, trapping provisions. There are so many ways to do this but I realize these are hard and a bullet is cheap. We are too evolved for the old style of management and we must make the effort to do this right. Please move Oregon into a model state for wildlife conservation. Take into account what the broad public desires and do not cater to the ranching industry.

Thank you for considering my comments.

Sincerely,

Kat Balogh

Oregon

Roxann B Borisch

Subject: FW: Wolf Plan

From: Brooks Smith <brkssmith@gmail.com>

Sent: Saturday, February 23, 2019 1:10 PM

To: odfw.commission@state.or.us

Subject: Wolf Plan

To: Oregon Fish and Wildlife Commission

Please consider the following in your vote on a Wolf Plan:

Wolves should not remain unchecked in their population growth.

Wolves have affected my historical hunting. I do not hunt these areas because they have impacted my hunting opportunity.

Stock growers will need relief from expanding wolf populations.

Wolf numbers can not continue to spread without any control, or management plan.

Brooks Smith

PO Box 749

Coquille Oregon 97423

2-23-2019

Oregon Department of Fish and Wildlife

Commission adoption of Wolf Plan

WOLVES MUST BE MANAGED.

All living things exist on other living things.

Most prey species consume vegetation, when habitat can support they will do well and multiply.

When they do well predators will increase.

When predators reduce the prey below what will support them they will decline or will relocate or turn to other prey to survive, if not available they will starve to extinction.

Humans determined that they must control themselves through seasons and bag limits to preserve wildlife.

Other predators will kill the last of anything they can to not starve.

Wolves in the Northeast were able to cross the ice to an island that was inhabited by caribou, efforts were made to trap and relocate the few caribou that are left to an island without wolves to try to save this herd from extinction. I am sure there are those that say the caribou should not only be left for annihilation, and in addition provide more animals for slaughter.

Idaho has found that hunting and trapping cannot keep up with the increasing wolf population.

They utilized aerial efforts to kill 20 of wolves that had reduced the Lolo elk herd from 12000 to 2000.

Idaho now reports that Hydatid disease that did not exist prior to wolves being reintroduced is now spreading to other animals.

We humans are the only ones that can manage predators and prey to prevent the extreme ups and downs of both predators and prey.

Richard E. Nelson
61394 Ward Rd
Bend, Oregon 97702

541-382-8520

renelson@teleport.com

Roxann B Borisch

Subject: FW: please vote to revised Wolf Plan

From: william tierce <wstierce@gmail.com>

Sent: Sunday, February 24, 2019 3:08 PM

To: odfw.commission@state.or.us

Subject: please vote to revised Wolf Plan

ODFW Commission,

I am very concerned for our livestock producers who, at this time, bear the greatest burden and who want to see, as we do, that wolf population numbers are eventually managed like cougar and black bear.

sincerely,
William S. Tierce

Roxann B Borisch

From: Doug Stout <sevenptbull@hotmail.com>
Sent: Thursday, February 28, 2019 1:48 PM
To: odfw.commission@state.or.us
Subject: Revised Wolf Management Plan

Categories: Forwarded to Wildlife

Dear Commissioner's,

I am writing to ask that you please approve the Revised Wolf Management Plan.

I have hunted the Absoraka-Beartooth Wilderness Area just North of Yellowstone Park extensively, both pre-wolf and post-wolf. I have seen first hand the results when a wolf population is allowed to expand it's numbers and territory without any scientific management. The severe decline of the Northern Yellowstone Elk Herd during the period of no wolf management is well documented. Over the years I have personally seen many, many dead elk killed by wolves. Most were barely fed upon. Some were not fed upon at all, killed by wolves and left to rot. Having a front row seat to the impact of wolves on the Northern Yellowstone Elk Herd was physically and emotionally sickening.

To expect an unmanaged wolf population in Oregon to do anything different here in Oregon than what occurred in Montana, Wyoming and Idaho is unrealistic and quite frankly, ridiculous.

An uncontrolled and unmanaged wolf population will also drastically increase the unfair burden on Oregon's ranchers who are already suffering financial loss due to wolves.

Dear Commissioner's, please do not destroy decades of sound scientific management of Oregon's big game herds. Please approve the revised Wolf Management Plan so that the wolves can be managed for a balanced and healthy predator to prey ratio.

Thank You,

Douglas R. Stout

66245 Barr Rd.
Bend, OR 97703

541-749-8910

Roxann B Borisch

From: Jack <jack@bendbroadband.com>
Sent: Thursday, February 28, 2019 3:17 PM
To: odfw.commission@state.or.us
Subject: Oregon Revised Wolf Management Plan

Categories: Forwarded to Wildlife

ODFW Commissioner's,

It is my understanding that the ODFW commission will soon be making a decision on wolf management. I am writing to ask that you please approve the Revised Wolf Management Plan.

The severe decline of the Yellowstone Elk herds during the period of no wolf management is well documented. To expect an unmanaged wolf population to do anything different here in Oregon than what has occurred in Montana, Wyoming and Idaho is unrealistic and, quite frankly, unconscionable. An uncontrolled and unmanaged wolf population drastically increases the unfair burden on Oregon's ranchers who are already suffering financial losses due to wolf depredation, and affects the economics associated with businesses directly or indirectly related to hunting and the outfitting of hunters.

Please approve the revised Wolf Management Plan so that the wolves can be managed using scientific best practices rather than unfounded emotions.

Thank You,

Jack McCaleb
Redmond, OR 97756
541-604-6099

Roxann B Borisch

From: Padraic Sheehan <pad4384@gmail.com>
Sent: Thursday, February 28, 2019 4:22 PM
To: odfw.commission@state.or.us
Subject: OR revised wolf plan

Categories: Forwarded to Wildlife

To whom it may concern,

I am writing in regards to the revised wolf plan up to vote and to voice my opinion on the matter.

As an Oregon citizen and hunter, I ask that you approve the revised plan. Hunters and outdoorsmen have been patient and accepting with the rapid changes that have been occurring with the presence of another apex predator on the landscape. But I do believe that it is time the wolf is managed like the other major predators in the state to assure balance is maintained and that our hunting culture and traditions will be there for our children and generations to come.

When it comes to game management, I am a firm believer in the science and data that dictates available bag limits without harming the harmony in which all animals play a part in. I think the wolf should be a part of that management system that has proven itself effective and am comfortable that the ODFW will do a good job assuring the future of wolves and their prey in the process just like our neighboring states have done.

Aside from the voices of those who vote on their emotions based on the look of certain animals instead of these proven methods, I ask you to hear the other voices as well. Ones that understand that our ranching culture (who probably have the hardest hand dealt), hunters, outdoorsmen and wolves can all exist in the state together.

Please approve the revised wolf plan and let's take the next step in our states ability to restore and manage a healthy ecosystem.

Thank you for your time.

Sincerely,
Padraic Sheehan

Roxann B Borisch

From: outlook_1F7FC45BA8667F11@outlook.com
Sent: Sunday, March 3, 2019 1:09 PM
To: odfw.commission@state.or.us
Subject: revised Wolf Conservation and Management Plan

Categories: printed

Please approve the Revised Wolf Conservation and Management Plan.

The most logical outcome is for the wildlife professionals at ODFW to manage wolves with the best available science. The Department has a long history of successfully managing cougars, bears and all other wildlife. Using science rather than emotion has resulted in decades of stable wildlife populations in Oregon. Let's continue this win.

Respectfully

Ronald Mabe

Portland, 97229

Sent from Mail for Windows 10

Roxann B Borisch

From: jorge.heyita@everyactioncustom.com on behalf of George Atiyeh
<jorge.heyita@everyactioncustom.com>
Sent: Thursday, March 7, 2019 4:05 PM
To: odfw.commission@state.or.us
Subject: Wolf Plan Comment on Latest Revisions

Categories: printed

Dear ODFW Commission,

I have been a strong environment advocate and I come from a seriously political family. I am writing to express my strong opposition to the current revisions of the draft Wolf Conservation and Management Plan, no hunting of the wolves !

You must not let the wolves abnormally die or be hunted out of existence. It will far better for you to back off.

If you don't believe me look it up my credentials and my career I'm on the internet.

Thank you.

George Atiyeh

Sincerely,
Mr George Atiyeh
9923 N Fork Ln SE Lyons, OR 97358-9431
jorge.heyita@gmail.com

Roxann B Borisch

From: Greg Ammer <gja1602@gmail.com>
Sent: Friday, March 8, 2019 2:45 PM
To: ODFW Commission
Subject: Confirming wolves kill livestock

Follow Up Flag: Follow up
Flag Status: Completed

Did anyone ODFW due there homework.

US Wildlife Services have determined that wolves can chase and harrass cattle to died of heart attack. Article Idaho Statesman Newspaper..

Remember ODFW stated did not understand how wolves killed llama 12/25/2017 but refused to get second opinion US Wildlife Services.

How many investigations wolves killing livestock not the TRUTH by ODFW.

Greg Ammer

Roxann B Borisch

From: Mark Whitham <markwhitham97701@gmail.com>
Sent: Saturday, March 9, 2019 9:29 AM
To: odfw.commission@state.or.us
Subject: wolf plan

Dear Commissioners:

I believe a decision on the wolf plan is coming up soon. I expect the ODFW will make few revisions to their plan already submitted which does not hold the livestock industry to much of a standard for non-lethal control. It has been over 100 years since Teddy Roosevelt was president, and the destroy the predator livestock and agricultural industry has not changed their attitude one bit. With the Federal government under control of the fossil fuel industry, it is time for Oregon to have a Teddy Roosevelt attitude stance toward conservation. While we say we are proud of wolf recovery program, in 20 years there are barely more than a 100 wolves in the state. On the last wolf plan submitted we did not use the best science available and obviously it shows in the stagnant recovery of wolves.

I urge you to at the very least to remove the lethal control option unless the livestock industry can prove to the public they are doing everything possible to protect their herds, including range riders. I do not see in depredation updates any indication of the effort or deterrent method being used except to say they remove dead cattle from the area.

A Teddy Roosevelt moment would be to **relist the wolf under the ESA throughout the state** and put the responsibility to protect livestock on the people who are profiting from them. If 100 cows are lost annually valued at \$1000 per head, that is \$100,000. I believe you already have twice that in a compensation budget. Also, remove all compensation programs from Federal Land where depredation occurs, that land is owned by the public, they are already being given a subsidized gift for grazing livestock there which is damaging our public land.

Please remember, the livestock and agricultural industry along with government predator control programs were responsible for the initial annihilation of the great predators including wolves, and grizzlies, as well as the slaughter of 60 million buffalo before 1900.

Please consider what I have said as you make your decision.

Sincerely,

Mark Whitham

Roxann B Borisch

From: Connie Dunham <mtnaire.connie@gmail.com>
Sent: Sunday, March 10, 2019 12:32 PM
To: odfw.commission@state.or.us
Subject: Fwd: wolf plan revision

Commissioners,

I know that stakeholders on the pro wolf side have declined to attend the last meeting you held on the wolf plan and that you have a proposed revision coming out regardless. I wondered if you have ever talked to Valarius Geist, the professor from the University of Calgary, in regards to the problems he is very familiar with, concerning wolves.

This man probably knows more about wolves than any person in the northwest. He is available for discussion about wolf issues such as this:

wolves will become worthless hybrids unless they are kept away from domestic dogs and coyotes. Now that they have been introduced to several states where contact with ranch dogs is common, and coyotes come around livestock, especially sheep, their purity as a wolf species will be in jeopardy due to interbreeding.

Secondly, the wolf has ended up spreading chronic wasting disease among elk. The thought was that wolves would kill the ones sick with this disease, but that isn't happening. They are spreading the prion that causes the disease and more of our elk herds are being infected. This is a major concern for conservation of our great game herds.

Dr. Geist would be glad to give you more information on this and other issues of health for people and game.

Sincerely,

Connie Dunham

--

Mtnaire Sport Horses

Mtnaire Pugs

Owner: Connie Dunham

Phone: 541-426-3315

<http://www.mtnairesporthorses.com>

<http://www.mtnairepugs.com>

"He has showed you, O Man, what is good. And what does the Lord require of you? To act justly, and to love mercy, and to walk humbly with your God."

Roxann B Borisch

From: edm_austin@everyactioncustom.com on behalf of David Michalek
<edm_austin@everyactioncustom.com>
Sent: Saturday, March 9, 2019 7:50 AM
To: odfw.commission@state.or.us
Subject: Wolf Plan Comment on Latest Revisions

Dear ODFW Commission,

I strongly oppose the current revisions of the draft Wolf Conservation and Management Plan.

Hunting and trapping is not conservation or in the public's or wolves interest. The Oregon Department of Fish and Wildlife must do everything to protect our recovering wolf population not encourage their demise.

Go back to the drawing board to bring you a plan that is scientifically justified, supported by a majority of Oregonians, and makes Oregon a new model for wolf recovery in the 21st century.

Thank you.

Sincerely,
Mr David Michalek
25 Eugene St Hood River, OR 97031-2215
edm_austin@yahoo.com

From: David Moen <dmoen@nezperce.org>
Sent: Wednesday, March 13, 2019 9:28 AM
To: odfw.commission@state.or.us
Subject: Wolf Mngmt Plan Comment

Greetings ODFW Commission,

For the public record I would like you to accept my comments below regarding the revised wolf plan and your up-coming vote on it this spring:

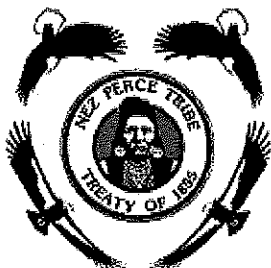
- I recommend that the Commission approve the revised Wolf Conservation and Management Plan.
- Sportsmen have already been compromising by accepting the presence of wolves in our state.
- I recognize that this acceptance of wolves is based on a responsible management plan that considers all the interests of Oregon citizens, including maintaining hunting opportunities for deer and elk, along with the ecological needs of our natural communities that benefit greatly from the increased bio-diversity that the presence of wolves brings to our landscapes.
- I have concern for livestock producers, who at this time bear the greatest burden and who want to see, as I do, wolf population numbers managed like big game just as cougars and black bears are. I think it is critical to help ranchers in NE Oregon overcome historical biases against wolves and this is one to do that, so they do not feel cornered. I also think ODFW could do more to play into those negative stereotypes by promote the science that sheds light on the positive ecosystem forcing that wolves to our ecological communities when they are on the land

Thank you for reading these comments, I hope that you will take them to heart when you consider your vote and your position on this critical issue.

Sincerely, David Moen

>><<<><><<>><><>>><<

David Moen, M.S.
Conservation Biologist
Nez Perce Wildlife Division
W: (208) 621-4695
C: (503) 954-4772



Roxann B Borisch

From: Lance Wooderson <lance.wooderson@gmail.com>
Sent: Wednesday, March 20, 2019 6:29 PM
To: odfw.commission@state.or.us
Subject: Wolf plan vote

As a lifetime oregonian and outdoorsman I have seen the quality of hunting opportunity, and game herds suffer greatly.

Its very frustrating to was it several years to finally draw a tag, only to never see a buck, bull or deer.

Its bad enough you have basically protected bears and cougars by eliminating hound hunting, now we have, to endure another apex predator. The Canadian grey Wolf is basically an invasive species and was never native to lower 48.

I think its time, and long over, due for common sense to prevail.

Please vote for Wolf conservation and management plan so maybe there will be something ledt for my daughter to hunt.

~lance wooderson

Roxann B Borisch

From: Marianne & Dan <maridan75@q.com>
Sent: Friday, March 22, 2019 4:54 PM
To: odfw.commission@state.or.us
Subject: Gray Wolves

dear commissioners:

We are writing to urge you not to remove endangered species protection for the gray wolves. These animals deserve our help and deserve to live. Oregon could easily provide sanctuary. Perhaps it would help to set up a fund to reimburse any farmers that lose livestock due to wolves. But the animals have to eat, and the deer population has declined. The fund could be set up as a charitable donation organization and many of us would donate. Our family are vegetarians and don't need the cattle and sheep. Our wildlife populations will keep themselves in balance, if we leave them alone. There are over 7.5 billions humans on this planet, all feeding off other animals. Surely we can afford to feed a few wolves!!

Marianne Strehler
Daniel Desmond

Roxann B Borisch

From: Rebecca White <coordinator@pacificwolves.org>
Sent: Monday, March 25, 2019 2:18 PM
To: odfw.commission@state.or.us
Subject: Pacific Wolf Coalition letter re: Federal ESA Wolf Delisting Proposal
Attachments: Letter from Pacific Wolf Coalition re Federal Wolf ESA Delisting.pdf

Hello,

Please find attached (and pasted below the signature line) the Pacific Wolf Coalition's letter asking Governor Brown to speak against the federal proposal to delist gray wolves from the Endangered Species list.

Please reach out to me with any questions.

The text of the letter is included below.

Thank you,
Rebecca White
Coordinator, Pacific Wolf Coalition
coordinator@pacificwolves.org

Help welcome wolves home to the Pacific West!
www.pacificwolves.org

March 25, 2019

The Honorable Kate Brown
Governor of Oregon
160 State Capitol
900 Court Street
Salem, Oregon 97301

Dear Governor Brown:

The Pacific Wolf Coalition is an alliance of state, national, and regional conservation organizations that work together to promote the recovery of gray wolves to their native habitats across the Pacific West. **We call on you to speak out now to oppose the Trump Administration's unscientific plan to remove federal Endangered Species Act protections from gray wolves across the lower 48 states.**

The proposed federal rule would remove protections from gray wolves coast to coast, with the exception of Mexican gray wolves in the Southwest. Federal protections for wolves in Oregon, already withdrawn by Congress from the eastern one-third of the state, would now be stripped from the western two-thirds, as well.

The Endangered Species Act is America's most effective law for protecting wildlife in danger of extinction. It serves as an essential safety net when state management has failed to protect imperiled plants, fish, and wildlife. Since its enactment, 99 percent of listed species have survived and hundreds more have been set on a path to recovery.

The recent announcement by Acting Interior Secretary David Bernhardt to prematurely remove federal Endangered Species Act protections for gray wolves is the latest in a series of efforts by the Trump administration to dismantle protections for wildlife. While specifically targeting individual species like gray wolves, the administration seeks to weaken the Endangered Species Act, our very backstop against wildlife extinction.

Thanks to the Act, the gray wolf has gained a foothold toward recovery in the contiguous United States, following centuries of human persecution that brought them to the brink of extinction. However, the gray wolf is still functionally extinct in 90 percent of its historic range nationwide, and in Oregon, occupies only around 12 percent of habitat that has been identified by our state wildlife agency as being suitable for wolves.

A few intrepid wolves, led by the famous OR-7, have ventured into southwest Oregon. Just last week, federal biologists confirmed a new group of resident wolves in the upper North Umpqua watershed. And earlier this year, conservation groups documented the presence of a new wolf pack in Mount Hood National Forest for the first time in 70 years. These trailblazing wolves are currently protected by the federal Endangered Species Act, but would lose protection under the Trump Administration's proposal. Just as sobering, many pioneering wolves that dispersed from northeast Oregon into the southeastern part of the state have been illegally killed by poachers and their deaths remain open unsolved investigations, further demonstrating the *clear threats* wolves still face in Oregon.

Nationwide polling demonstrates that the majority of citizens value wolves as a part of our natural heritage and support gray wolf recovery, and only one in three thinks wolves should be delisted. Regional surveys of residents of the three West Coast states demonstrate support for wolves that far exceeds even the strong national figures. Polling shows an overwhelming number of West Coast voters "are supportive of efforts to restore wolves to suitable habitat in the region and believe that wolves should continue to be protected under the Endangered Species Act until they are fully recovered." Among Oregon voters, a full 82 percent of Democratic voters supported restoring wolves to their suitable habitat in the state. And even more telling, 63 percent of all Oregonians polled, regardless of voting preference, believed that "wolves should continue to be protected under the Endangered Species Act until they are fully recovered."

These remarkable creatures are icons of our landscape and their presence is vital to maintaining the natural dynamics of their native ecosystems. Wolves regulate the behavior of elk and deer populations, keeping herds from overgrazing. This allows trees to grow in greater abundance, grasses to grow taller, and other animals down the food chain to flourish, strengthening the resiliency of the entire ecosystem.

The gray wolf will eventually meet recovery goals and no longer need the protections afforded under the Endangered Species Act. We simply have not reached this critical point. When we get there, as clearly defined in the Act, the best available science should be the touchstone that determines delisting, not politics.

Wolf recovery, like climate change, should be viewed only through the lens of science without the distortion of politics. This undistorted view allows us to chart a clear course. We must act now to reverse the effects of our behavior on the climate, but we must also act now to reverse the impacts of our behavior on other species. It is imperative that we maintain and preserve the biodiversity that remains.

Federal endangered species protections remain essential to facilitate the species and habitat protection necessary for the gray wolf's return to more distant reaches of its former range. The bald eagle is an Endangered Species Act success story, and was allowed to expand its range prior to federal delisting. Any claim that gray wolves have recovered throughout a significant portion of their historic range is simply not supported by science.

Because wolves in Oregon are no longer protected under the Oregon Endangered Species Act, we believe the species' best chance of recovery — especially for OR-7 and the other pioneers west of the Cascades — lies in retaining federal protections.

Your strong voice is pivotal in defeating this disastrous proposal that threatens the future of one of our nation's iconic species, a true symbol of the West. We ask you to speak against it today, and further, to direct your wildlife agency and commission to stand strong in opposition to the Administration's unscientific and ill-considered proposal.

Sincerely yours,

The Pacific Wolf Coalition

Coalition Member Organizations:

Bark
Blue Mountains Biodiversity Project
California Wolf Center
Cascade Forest Conservancy
Cascadia Wildlands
Center for Biological Diversity
Defenders of Wildlife
Earthjustice
Endangered Species Coalition
Environmental Protection Information Ctr.
Forest Web of Cottage Grove
Greater Hells Canyon Council
Kettle Range Conservation Group
Klamath Forest Alliance
Klamath-Siskiyou Wildlands Center
The Lands Council
Living With Wolves
Mountain Lion Foundation
National Parks Conservation Association
Natural Resources Defense Council
Northeast Oregon Ecosystems
Oregon Chapter Sierra Club

Oregon Wild
Predator Defense
Project Coyote
Sierra Club California
Washington Chapter Sierra Club
Western Environmental Law Center
Western Wildlife Outreach
Western Watersheds Project
WildEarth Guardians
Wildlands Network

CC: Curt Melcher, Director of the Oregon Department of Fish and Wildlife
Michael Finley, Chair of the Oregon Fish and Wildlife Commission
Holly Akenson, Oregon Fish and Wildlife Commission
Bruce Buckmaster, Oregon Fish and Wildlife Commission
Jim Bittle, Oregon Fish and Wildlife Commission
Gregory J. Wolley, Oregon Fish and Wildlife Commission
Bob Webber, Oregon Fish and Wildlife Commission

PACIFIC
WOLF
COALITION

March 25, 2019

The Honorable Kate Brown
Governor of Oregon
160 State Capitol
900 Court Street
Salem, Oregon 97301

Dear Governor Brown:

The Pacific Wolf Coalition is an alliance of state, national, and regional conservation organizations that work together to promote the recovery of gray wolves to their native habitats across the Pacific West. **We call on you to speak out now to oppose the Trump Administration's unscientific plan to remove federal Endangered Species Act protections from gray wolves across the lower 48 states.**

The proposed federal rule would remove protections from gray wolves coast to coast, with the exception of Mexican gray wolves in the Southwest. Federal protections for wolves in Oregon, already withdrawn by Congress from the eastern one-third of the state, would now be stripped from the western two-thirds, as well.

The Endangered Species Act is America's most effective law for protecting wildlife in danger of extinction. It serves as an essential safety net when state management has failed to protect imperiled plants, fish, and wildlife. Since its enactment, 99 percent of listed species have survived and hundreds more have been set on a path to recovery.

The recent announcement by Acting Interior Secretary David Bernhardt to prematurely remove federal Endangered Species Act protections for gray wolves is the latest in a series of efforts by the Trump administration to dismantle protections for wildlife. While specifically targeting individual species like gray wolves, the administration seeks to weaken the Endangered Species Act, our very backstop against wildlife extinction.

Thanks to the Act, the gray wolf has gained a foothold toward recovery in the contiguous United States, following centuries of human persecution that brought them to the brink of extinction. However, the gray wolf is still functionally extinct in 90 percent of its historic range nationwide, and in Oregon, occupies only around 12 percent of habitat that has been identified by our state wildlife agency as being suitable for wolves.

A few intrepid wolves, led by the famous OR-7, have ventured into southwest Oregon. Just last week, federal biologists confirmed a new group of resident wolves in the upper North Umpqua watershed. And earlier this year, conservation groups

documented the presence of a new wolf pack in Mount Hood National Forest for the first time in 70 years. These trailblazing wolves are currently protected by the federal Endangered Species Act, but would lose protection under the Trump Administration's proposal. Just as sobering, many pioneering wolves that dispersed from northeast Oregon into the southeastern part of the state have been illegally killed by poachers and their deaths remain open unsolved investigations, further demonstrating the *clear threats* wolves still face in Oregon.

Nationwide polling demonstrates that the majority of citizens value wolves as a part of our natural heritage and support gray wolf recovery, and only one in three thinks wolves should be delisted.¹ Regional surveys of residents of the three West Coast states demonstrate support for wolves that far exceeds even the strong national figures. Polling shows an overwhelming number of West Coast voters "are supportive of efforts to restore wolves to suitable habitat in the region and believe that wolves should continue to be protected under the Endangered Species Act until they are fully recovered." Among Oregon voters, a full 82 percent of Democratic voters supported restoring wolves to their suitable habitat in the state. And even more telling, 63 percent of all Oregonians polled, regardless of voting preference, believed that "wolves should continue to be protected under the Endangered Species Act until they are fully recovered."²

These remarkable creatures are icons of our landscape and their presence is vital to maintaining the natural dynamics of their native ecosystems. Wolves regulate the behavior of elk and deer populations, keeping herds from overgrazing. This allows trees to grow in greater abundance, grasses to grow taller, and other animals down the food chain to flourish, strengthening the resiliency of the entire ecosystem.

The gray wolf will eventually meet recovery goals and no longer need the protections afforded under the Endangered Species Act. We simply have not reached this critical point. When we get there, as clearly defined in the Act, the best available science should be the touchstone that determines delisting, not politics.

Wolf recovery, like climate change, should be viewed only through the lens of science without the distortion of politics. This undistorted view allows us to chart a clear course. We must act now to reverse the effects of our behavior on the climate, but we must also act now to reverse the impacts of our behavior on other species. It is imperative that we maintain and preserve the biodiversity that remains.

Federal endangered species protections remain essential to facilitate the species and habitat protection necessary for the gray wolf's return to more distant reaches of its former range. The bald eagle is an Endangered Species Act success story, and was allowed to expand its range prior to federal delisting. Any claim that gray wolves have

¹ Public Policy Polling 2015 (see attached).

² Tulchin Research 2013 (see attached).

recovered throughout a significant portion of their historic range is simply not supported by science.

Because wolves in Oregon are no longer protected under the Oregon Endangered Species Act, we believe the species' best chance of recovery — especially for OR-7 and the other pioneers west of the Cascades — lies in retaining federal protections.

Your strong voice is pivotal in defeating this disastrous proposal that threatens the future of one of our nation's iconic species, a true symbol of the West. We ask you to speak against it today, and further, to direct your wildlife agency and commission to stand strong in opposition to the Administration's unscientific and ill-considered proposal.

Sincerely yours,

The Pacific Wolf Coalition

Coalition Member Organizations:

Bark	Living With Wolves
Blue Mountains Biodiversity Project	Mountain Lion Foundation
California Wolf Center	National Parks Conservation Association
Cascade Forest Conservancy	Natural Resources Defense Council
Cascadia Wildlands	Northeast Oregon Ecosystems
Center for Biological Diversity	Oregon Chapter Sierra Club
Defenders of Wildlife	Oregon Wild
Earthjustice	Predator Defense
Endangered Species Coalition	Project Coyote
Environmental Protection Information Ctr.	Sierra Club California
Forest Web of Cottage Grove	Washington Chapter Sierra Club
Greater Hells Canyon Council	Western Environmental Law Center
Kettle Range Conservation Group	Western Wildlife Outreach
Klamath Forest Alliance	Western Watersheds Project
Klamath-Siskiyou Wildlands Center	WildEarth Guardians
The Lands Council	Wildlands Network

CC: Curt Melcher, Director of the Oregon Department of Fish and Wildlife
Michael Finley, Chair of the Oregon Fish and Wildlife Commission
Holly Akenson, Oregon Fish and Wildlife Commission
Bruce Buckmaster, Oregon Fish and Wildlife Commission
Jim Bittle, Oregon Fish and Wildlife Commission
Gregory J. Wolley, Oregon Fish and Wildlife Commission
Bob Webber, Oregon Fish and Wildlife Commission



National Survey Results

- Q1** Last century, wolves were driven to the brink of extinction in the lower 48 states, and today are found in just 5% of the places where they once were. Now the federal government wants to take away Endangered Species Act protection for nearly all wolves in the lower 48 states. Do you support or oppose this proposal?
- Support 31% Not sure 22%
- Oppose 47%
- Q2** Scientists have identified hundreds of thousands of square miles of wolf habitat in places like Colorado, California, and the Northeast where no wolves live today. Do you think wolves should be given a chance to return to these areas, or not?
- Do 56%
- Do not 32%
- Not sure 12%
- Q3** There were once 2 million wolves in North America. Today, in the lower 48, there are fewer than 6,500 wolves, or less than 1% of their original numbers. The government has declared wolves fully recovered, and says they should no longer be protected. Do you think the wolf population has recovered, or not?
- Think they have 33%
- Think they have not 50%
- Not sure 16%
- Q4** Do you agree or disagree that wolves are a vital part of America's wilderness and natural heritage?
- Agree 70%
- Disagree 22%
- Not sure 7%
- Q5** Would you like to see a wolf in the wild, or not?
- Would 55%
- Would not.....34%
- Not sure 11%
- Q6** Would knowing that wolves live in a natural area in your state make you more inclined to value that area or less inclined?
- More inclined 51%
- Less inclined 28%
- Not sure 21%
- Q7** In recent decades, scientists have increasingly recognized the role that wolves play in the wild. Research has shown that returning wolves to the landscape sets off a chain of events that benefits many species, including songbirds, beavers, and foxes. Do you think wolves should be given a chance to play their role in nature, or not?
- They should 68%
- They should not 24%
- Not sure 8%
- Q8** In states where wolves have already lost federal protection, state wildlife agencies have instituted aggressive hunting and trapping practices to dramatically reduce wolf populations. More than 1,600 wolves have been killed in the last two years. Do you support or oppose this approach?
- Support 31%
- Oppose 49%
- Not sure 21%





Q9 Who did you vote for President in 2012?

Barack Obama..... 44%
Mitt Romney..... 40%
Someone else/Don't remember 15%

Q10 If you are a woman, press 1. If a man, press 2.

Woman 53%
Man..... 47%

Q11 If you are a Democrat, press 1. If a Republican, press 2. If you are an independent or identify with another party, press 3.

Democrat 40%
Republican..... 37%
Independent/Other..... 23%

Q12 If you are Hispanic, press 1. If white, press 2. If African-American, press 3. If other, press 4.

Hispanic 9%
White 73%
African-American 11%
Other..... 7%

Q13 If you are 18 to 29 years old, press 1. If 30 to 45, press 2. If 46 to 65, press 3. If you are older than 65, press 4.

18 to 29..... 14%
30 to 45..... 20%
46 to 65..... 46%
Older than 65..... 20%





Crosstabs

	Base	2012 Vote		
		Barack Obama	Mitt Romney	Someone else/Don't remember
Support/Oppose Taking ESA Protection Away from Wolves				
Support	31%	24%	37%	34%
Oppose	47%	58%	39%	38%
Not sure	22%	18%	24%	28%

	Base	2012 Vote		
		Barack Obama	Mitt Romney	Someone else/Don't remember
Has Wolf Population Recovered?				
Think they have	33%	24%	40%	41%
Think they have not	50%	58%	45%	42%
Not sure	16%	18%	15%	17%



TULCHIN RESEARCH
Polling & Strategic Consulting

September 12, 2013

To: Interested Parties
From: Ben Tulchin and Ben Krompak, Tulchin Research
Re: **New Poll Finds Strong Support for Wolf Protection in Western States**

Tulchin Research recently conducted a survey on issues relating to the protection and restoration of wolves in California, Oregon, and Washington State. We interviewed 500 registered voters in California, 300 voters in Oregon, and 300 voters in Washington. Our research finds overwhelming majorities of voters in all three states are supportive of efforts to restore wolves to suitable habitat in the region and believe that wolves should continue to be protected under the Endangered Species Act until they are fully recovered.

Voters Overwhelmingly Favor Wolf Restoration

We asked voters about their attitudes toward restoring wolves to the region and found strong support for these efforts in all three states. Asked whether they would support or oppose restoring wolves to suitable habitat in their state, 69 percent of California voters say they support this as do 66 percent of voters in Oregon and 71 percent of Washington State voters.

"Do you support or oppose restoring wolves to suitable habitat in your state?"			
	California Voters	Oregon Voters	Washington Voters
Total Support	69%	66%	71%
Total Oppose	15%	23%	17%
Undecided	15%	11%	12%

Support for wolf restoration is both broad and deep and extends across the political spectrum, with sizable majorities of Democrats, Republicans, and Independents in all three states favoring the restoration of wolves. Restoration is also supported by wide majorities of both men and women and among voters both under and over age 55.

CALIFORNIA VOTERS							
"Do you support or oppose restoring wolves to suitable habitat in your state?"							
	BY PARTY			GENDER		AGE	
	Democrats	Republicans	Independents	Men	Women	Age 18-54	Age 55+
Support	74%	58%	74%	69%	69%	75%	65%
Oppose	12%	25%	11%	14%	16%	12%	20%
Undecided	14%	18%	15%	16%	14%	14%	15%

OREGON VOTERS							
"Do you support or oppose restoring wolves to suitable habitat in your state?"							
	BY PARTY			GENDER		AGE	
	Democrats	Republicans	Independents	Men	Women	Age 18-54	Age 55+
Support	82%	51%	61%	61%	72%	70%	63%
Oppose	11%	40%	21%	27%	19%	20%	25%
Undecided	8%	9%	18%	12%	10%	10%	12%

WASHINGTON VOTERS							
"Do you support or oppose restoring wolves to suitable habitat in your state?"							
	BY PARTY			GENDER		AGE	
	Democrats	Republicans	Independents	Men	Women	Age 18-54	Age 55+
Support	82%	61%	73%	69%	73%	75%	67%
Oppose	11%	21%	17%	19%	15%	16%	18%
Undecided	8%	18%	9%	12%	12%	9%	15%

Voters Support Continued Endangered Species Act Protection for Wolves

With the federal government proposing to remove wolves from the Endangered Species list and end the protections that go along with that, we asked voters their opinions about the matter. By wide margins, voters in all three states believe that "wolves should continue to be protected under the Endangered Species Act until they are fully recovered." Eight in ten California voters (80 percent) agreed with the statement, as did 72 percent of voters in Washington and 63 percent of Oregon voters.

Please tell me whether you agree or disagree with the following statement: <i>Wolves should continue to be protected under the Endangered Species Act until they are fully recovered.</i>			
	California Voters	Oregon Voters	Washington Voters
Total Agree	80%	63%	72%
Total Disagree	13%	32%	22%
Don't Know/No Answer	7%	5%	6%

Voters See Wolves as Part of our Natural Heritage, Recognize Role in Maintaining Healthy Deer and Elk Populations

Voters broadly believe that “wolves should be protected in our state” as they are “a vital part of America’s wilderness and natural heritage,” including 83 percent of California voters, 68 percent of Oregon voters, and 75 percent of Washington voters agreeing with this statement. Additionally, strong majorities of voters in all three states agree that “wolves play an important role in maintaining healthy deer and elk populations” and thus “restoring wolves to forests and wilderness areas in our state will bring a healthier balance to our ecosystem.” This view is held by 73 percent of California voters, 69 percent of Oregon voters, and 74 percent of Washington voters.

“Now I’m going to read you a few statements about policies toward wolves. Please tell me whether you agree or disagree with each statement.”						
	California Voters		Oregon Voters		Washington Voters	
	Total Agree	Total Disagree	Total Agree	Total Disagree	Total Agree	Total Disagree
Wolves should be protected in our state. Wolves are a vital part of America’s wilderness and natural heritage.	83%	11%	68%	26%	75%	20%
Wolves play an important role in maintaining healthy deer and elk populations. Restoring wolves to forests and wilderness areas in our state will bring a healthier balance to our ecosystem.	73%	15%	69%	23%	74%	19%

California Voters Support Protections for Wolves Crossing Over from Other States

In California, we specifically asked voters about policy regarding wolves who cross over into the Golden State from other states. Nearly eight in ten California voters (79 percent) agree that “we should take steps to protect wolves who cross over into California and ensure they reach appropriate habitat.”

Please tell me whether you agree or disagree with the following statement: <i>We should take steps to protect wolves who cross over into California and ensure they reach appropriate habitat.</i>	
Total Agree	79%
Total Disagree	14%
Don’t Know/No Answer	7%

Conclusion

In conclusion, this poll demonstrates that voters in California, Oregon, and Washington strongly support restoring wolves to suitable habitat in their states and believe that wolves should continue to be protected under the Endangered Species Act until they are fully recovered.

Survey Methodology: From September 4-8, 2013, Tulchin Research conducted a telephone survey among 500 registered voters in California, 300 registered voters in Oregon, and 300 registered voters in Washington. The margin of error for this survey is +/- 5.66 percentage points among voters in Oregon and Washington. The margin of error among California voters is +/- 4.38 percentage points.

Roxann B Borisch

From: Jonathan Evans <Jonathan.Evans@pgn.com>
Sent: Monday, April 8, 2019 1:58 PM
To: odfw.commission@state.or.us
Subject: Wolves

Hopefully trapping and hunting will start ASAP the Upper Umatilla River is quiet now except wolf howls and they need a serious reduction in numbers.

Jon Evans
Tech
Carty Generation
541-481-4951



Roxann B Borisch

From: Wayne Endersby <vicchad1@pinetel.com>
Sent: Monday, April 15, 2019 7:30 PM
To: odfw.commission@state.or.us
Subject: Wolf Management Plan

Categories: Forwarded to Wildlife

To Whom It May Concern:

My name is Wayne Endersby and I live in Halfway, Oregon.

I am writing this email to voice a concern that I have with the Wolf Management Plan which I received today.

Earlier this spring a friend of mine had three or four wolves attack his working cow dog. The dog was chased from the barn to the house where the home owner heard the commotion, looked outside and saw his dog being attacked. He grabbed his rifle and shot one of the wolves. He called ODFW to report the incident. An investigation was conducted and the District attorney stated that no crime had happened.

It was after this that I found out that it was legal for a person to protect a working dog but not their pet dog.

I was hoping that the new plan would provide some protection for those of us who live in wolf country and have pets.

After reading the plan, I saw that there was no allowance for the use of lethal force if a wolf is attacking a dog or other pets.

I have had wolves less than 300 yds from my house. I also like to take hikes and backpack with my dog.

Now when I do hike or backpack, I take a firearm with me for protection. I never used to feel like I needed this, but, in recent years, I have felt the need to have some protection with me .

Like most people, I consider my dog as family and I have always loved them like a family member. When one of my dogs have died, it was like losing a family member.

Would you be able to stand by and watch your dog or other pet get attacked and killed without doing anything about it? I would like you to please put yourself in this situation and try and answer honestly.

I am an law abiding person. I respect the law including our game laws. I have seen wolves while hunting and have not shot at or tried to kill any of them because of my respect for the law.

I would be unable to stand by if my dog was being attacked by a wolf or any other animal as far as that goes. I would use my firearm to protect it. I will be protecting a family member and am will to do anything to protect them.

If I do shoot and manage to kill or wound a wolf, what will I do? Report myself or walk away and hope nobody saw me? The way the law is written now, I will walk away which leaves me criminally responsible.

I hope that you will consider this and give the pet owner the same protection that a person has with a working dog.

Another point that I would like to make is that you are having this meeting in Salem. Salem is a seven hour drive from where I live.

For most people that have a vested interest in the wolf plan, that is a long way to travel. You might say that people can email. Well not everyone emails.

Eastern Oregon is an economically depressed area and the expense of traveling to Salem for a meeting will put a financial hardship on those people that would like to have their voice heard on this topic. Is there consideration in having an additional public meeting in Eastern Oregon where the wolf issue is most prevalent?

One final question: What verification can I expect that this correspondence has been read by your committee?

In conclusion, I would like to thank you for your work hard work. I truly respect ODFW. I look forward to your reply. My father worked for Fish and Game for 23yrs and I grew up at Oak Springs Fish Hatchery on the Deschutes River.

Sincerely

Wayne Endersby

Home Phone: 541-742-5763 (Best number to reach me)

Cell Phone: 541-519-8956

Email: vicchad1@pinetel.com

Roxann B Borisch

From: Richard Schramm <rpschramm@msn.com>
Sent: Tuesday, April 16, 2019 6:54 AM
To: odfw.commission@state.or.us
Subject: Regarding: Proposed Wolf Management Plan

Categories: Forwarded to Wildlife

To Whom It May Concern at ODFW:

I support the current, proposed wolf management plan that largely protects wolf populations across the state of Oregon and yet allows ranchers to kill a wolf if it kills twice in 9 months time.

Richard Schramm
3024 NE Bryce Street
Portland, OR. 97212

Sent from my iPad

Roxann B Borisch

From: Trina O'Leary <siskiyougirl55@gmail.com>
Sent: Tuesday, April 16, 2019 7:18 AM
To: odfw.commission@state.or.us
Subject: Wolves

Categories: Forwarded to Wildlife

I disagree with the newly proposed management plan for wolves in my State of Oregon. Quit letting the livestock owners decide the fate of any other creature on our Public Lands, or on the ground of this state. They want to kill anything and everything which does not "moo" or "baah" quite literally. When i lived in Eastern Oregon, i was shocked by the damage done to our, supposedly, Public Lands by cattle. It is obvious that ODFW is not "managing" our lands and wildlife for all of us, but only the elite ranch owners in this state. The wolves should have our protection and you should be doing your job right, and protecting them. Not pandering to those with the money.

Thank you, Kathi Romig

Roxann B Borisch

From: eddew7x7@aol.com
Sent: Tuesday, April 16, 2019 7:44 AM
To: odfw.commission@state.or.us
Subject: Wolf issues

Categories: Forwarded to Wildlife

Bow hunting has become a dangerous and sometimes worrisome outdoor past time. I have had several close calls with wolves coming into my camps at close range. Sightings and stand offs at mere feet having a wolf staring you down. I have moved camp to keep from having wolf encounters only to be again harassed by wolves. When I say moved I mean across state to the West side into the Cascade mountains. You asked use hunters to report any wolf sightings and I did only to get a nasty phone call from your employee that I must be mistaken and was called a liar to my face. They told me that they were happy that wolves had invaded my area and to have a nice day. I have passed on the rude way you handled a request that you had made to report sightings of wolves in any area. I will no longer report sighting, nor will all those that I have told

Now to the main issue with this letter and that is elk hunting in all areas holding fair amounts of elk and deer are waste lands of empty forest. No sign or sightings for a month in all the locations I hunted this last year. Disappointing and worry of a resource that at least at one time could be found to exist is now gone. Now you may think I have no bases to judge my missing elk theory on, but how about the count of elk and deer bone piles I find when going out to hunt spring bear in the mountains. In several Cascade locations the wolf scat and tracks are so prevalent that it makes a hunter wonder how this many wolves got there in the numbers sighted. Sadly it is that we no long have a Game Commission that is watching out for ALL GAME ANIMALS, but for how much can be put into your pockets from revenue provided by wolf recovery programs.

P.S. DON'T ASK WHERE I SEEN THE WOLVES I SIGHTED. YOU CAN BET THAT IS THERE ARE NO WOLVES IN THE CASCADES THEY MUST BE COYOTES AND CAN BE HUNTED BY US LIARS.

Roxann B Borisch

From: Gretchen Sabo <sabogr105@gmail.com>
Sent: Tuesday, April 16, 2019 1:40 PM
To: odfw.commission@state.or.us
Subject: wolf protection

Categories: Forwarded to Wildlife

Why can't better fencing be used to protect the sheep and cattle? Why do any wolves have to be killed?

Is it about the money? Sheep and cattle bring in money to the ranchers but no one makes any money from the wolves.

I am vehemently against killing animals. It is not the wolves' fault they need to eat.

Humans are smart and innovative. Why can't you find another way which may not be the easiest but a way that can protect all the animals.

Shooting a gun and killing an animal is easy and expedient, but it doesn't make it right.

Please take more time to consider options and select one that protects all the animals.

Thank you.

Gretchen Sabo

Lake Oswego

Roxann B Borisch

From: Jeff Price <jprice.pdx@gmail.com>
Sent: Wednesday, April 17, 2019 9:08 AM
To: ODFW Commission
Subject: Wolf Management Plan_adopt

Categories: Forwarded to Wildlife

April 17, 2019

Chairman & Commissioners
Oregon Department of Fish & Wildlife

Re: Wolf Conservation and Management Plan

Dear Commissioners,

No doubt the commission is aware that adoption of the Wolf Management Plan will have been delayed in excess of 18 months at the proposed meeting date on June 7. It is time to act without continued delay. An ample period for comments has been provided for the document vetted and assembled by the work group – there will never be a better consensus based simply on the contentious nature of the issues being discussed. Compromise for all is the best that can be achieved for this with a heavy weight toward the professionals in our specific state that have the best first-hand knowledge of the localized and regional ecosystems. Adopt the plan as it existed before the canid protectionists walked away from the work group less they contest further any new modifications claiming inability to comment as any changes will provide further support for judicial review. A genuine effort and practical approach was made by the state that included a diverse group to get the plan where it is - one that serves all of the residents of the state without political leaning of a populous metro region.

The plan provides a functional, science based and workable plan that will be flexible into the future; a requirement that will meet the certainly unforeseen situations that will develop. The plan accommodates a full array of tools for ODFW – those who must manage the wildlife for the entire state of Oregon – to utilize in keeping with their direction and purpose. We cannot provide sound management based on emotions that will not serve the animals and citizens of this state.

Furthermore, it is imperative that control include removal of animals so that an appropriate balance of the land and animals is maintained. The ranching and sporting communities have provided full cooperation and compromised much to date. Controlled take, both hunting and culling should be included. Wolves should be identified as a game mammal with controlled hunting as an element to conservation and management similar to other predators in the state. Hunting will also provide citizens an opportunity that will offset costs for conservation measures through license/tag fees with the direct benefit of population and depredation control; it will also offset gross expenditure of government hired culling operations. Paying professionals to do something citizens are willing to pay for the opportunity to do is not something we should support when the means and opportunity can exist.

Please envision an opportunity where people can buy a tag – similar to cougar tags – but without a number limit per person; a hunter could take one or many up to a point where a controlled number are met. Look to

Idaho as example – multiple tags per person and use of infilled deer and elk tags for non-residents. They have recently implemented special private land regulations as well to assist mitigation for livestock producers who are at the front lines. This will reinforce a desire in wolves to be wary and fearful of being proximal to populated areas. If, similar to cougars, hunting proves inefficient as a general standard, the surplus tag numbers go to a government culling effort. The culling operations would be available within the management plan but hopefully negligible so that budget costs are mitigated.

As a conservationist and outdoor enthusiast, I urge the commission to place emotion aside and understand the greater population and effects that exist. The work group should finalize the current plan and recommend that the commission adopt it fully including controlled take and hunting opportunities to assist for the benefit of and in consideration of all Oregonians through the state.

Regards,

Jeff P.
Portland, Oregon

Roxann B Borisch

From: Alison Laughlin <laughs@charter.net>
Sent: Wednesday, April 17, 2019 9:18 AM
To: odfw.commission@state.or.us
Subject: Wolf regulations

Categories: Forwarded to Wildlife

PUBLIC COMMENT ON THE PROPOSED NEW WOLF MNAGEMENT REGULATIONS

I approve of your efforts to reconsider the rules for killing a wolf. Ranchers say many more sheep are killed by wolves than reported. Yet wolves are not the only predators. Let's work with facts, not speculation.

Ranchers should be expected to take measures to reduce wolf attacks. Those on public land get grazing at a very cheap rate. They should be mandated to do the recommended measures. (A set number – 3?) and to provide proof each time they reapply for public land use. There needs especially to be an increase in human and dog contact. Public land grazing can occur a long way from the ranchers home, so very little human supervision occurs. I also believe ranchers on public land need to manage the waterways – and show proof each time they apply for use. Grazing on public lands should support the land not degrade it.

We know that killing a predator may cause more problems as the pack structure is disrupted, and more rather than less killings could occur. It is not a solution.

Wolves and cattle can coexist, let's find a solution that allows this, and use this as an opportunity to recommit to well managed public lands.

Sincerely
Alison Laughlin
717 Roca St
Ashland OR 97520

Roxann B Borisch

From: Betsy McCarthy <BetsyMcCarthy@hotmail.com>
Sent: Wednesday, April 17, 2019 12:59 PM
To: odfw.commission@state.or.us
Subject: wolf plan

Categories: Forwarded to Wildlife

Dear Commission,

I am in support of helping the wolf population grow with the use of protections from our state. After 60 years without a wolf population, Oregon is just in the beginning stages of helping them to get reestablished and we need to continue to protect them with strong measures. Wolves already face many obstacles to survive such as our road system and all the urban sprawl that diminishes their need for territory, so they will continue to need laws that support their comeback.

After seeing the transformation of the ecosystem in Yellowstone National Park after the reintroduction of wolves, I am hopeful that areas of Oregon can be transformed to. Wolves are an important part of the overall health of our planet and Mother Earth is in need of all the help she can get.

I urge you to keep the laws as strong as possible to protect this amazing species we call wolves.

Betsy McCarthy
7230 SW 31st Ave
Portland OR 97219

Sent from Outlook

Roxann B Borisch

From: Janice Bassett <jan.bassett46@gmail.com>
Sent: Thursday, April 18, 2019 10:06 AM
To: odfw.commission@state.or.us; kaethe
Subject: Wolves

Categories: Forwarded to Wildlife

Once again we are struggling with some idea that man is somehow supreme over wildlife, in this case it's wolves. Again some notion that man's economic desires trump any other consideration.

While the wolf can be a vicious cow killing predator it's also true that wolves serve their ecological purpose by helping to maintain the health and balance of elk and other weak, sick or otherwise vulnerable animals. Is this not true of wolves and cows? Just what is the justification for creating policies that imply that killing is a natural right of farmers, ranchers, and sport hunters. This is silly, science tells us that we must support diversity of species. We know that the reality of climate change has resulted in damage to habitat and forcing animals to come closer to food sources to survive.

That said, I would respectfully request that the commission shift from supporting status quo remedies that facilitate killing rather than beginning to adapt to the ramifications of climate change. Please remember that a black and white solution is no solution. It just allows the greater problems to be avoided, denied and submerged by claims of self interest.

The issue of killing troublesome animals is, I guess, expedient but if we don't try to consider it based on evolving information is short sighted and fails to further a humane and pro-social world.

Bullying, ridiculing and demeaning folks who care about ecology, ecological diversity and a deeper discussion of how we will maintain and repair our earth is the "same old same old" tactics of greed and "power over" politics.

Let's not "kick the can down the road".

Let's give responsible, genuine consideration of science and support for a change of ideas, actions and process a chance.

Thank you.

Jan Bassett
Portland, OR

Roxann B Borisch

From: Charles <hollandcharles367@yahoo.com>
Sent: Friday, April 19, 2019 10:55 AM
To: odfw.commission@state.or.us
Subject: Wolf management

Categories: Forwarded to Wildlife

It has become increasingly obvious that the wolf populations in Oregon have grown beyond the boundaries of northeastern Oregon and continues to expand across the eastern portion of the state. It has also become increasingly obvious that our ungulate populations have been dwindling due to a growing number of issues.

In my opinion one of the major players in our decreasing populations of prey species here in Oregon is due directly to the out of control populations of apex predators, mainly wolves and cougars. We have watched as our neighboring states have waited to implement an effective wolf management plan and have witnessed the destruction it has caused.

As a 51 year resident of Oregon and an avid hunter, trapper, fisherman and outdoors enthusiast I have personally witnessed the destructive nature of improper wildlife management here in Oregon. Now is the time for a much needed revision in management practices before it's too late for our prey species to recover. Its time to take emotions out of the decision making process and start using scientific based facts and past examples as we implement new rules and regulations for predator management.

It is appalling to know that my children and grandchildren will never have the opportunities to experience Oregon as one of the greatest states for hunting and fishing as I did as a young adult growing up in this state.

As a closing statement I would like to remind you that ODFW has been lawfully tasked with managing ALL fish and wildlife in which they have grossly been in violation of for several years.

Thank You,
Charles Holland

Roxann B Borisch

From: North Bend Gregors <nbgregors@charter.net>
Sent: Friday, April 19, 2019 5:09 PM
To: odfw.commission@state.or.us
Subject: Wolf program update of April 15, 2019

To the commissioners

As usual, the plan is comprehensive and detailed, allowing the reader to understand what has happened and what will happen. Here are my comments:

I have closely followed Oregon's wolf plan and implementation for many years, and have sent written comments from time to time. I have generally approved the plan, as it shows the effort to bridge the differences between those who want more wolves, and those who want fewer. Past plans have been highly rational, and the proposed plan is no exception.

1. Under coordination with other agencies, the Oregon Dept. of Agriculture is not listed. There is adequate coverage later, under compensation. I have long recommended that the compensation program respond quickly with compensation where confirmed wolf depredation has occurred. And I have often wondered how a compensation program administered by an agency other than ODFW could respond quickly. Especially as it is a "grant" program, which to me suggests the opposite of quick. I have been told, by ODFW staff, that I should talk with ODA about this; this response suggests a problem.

Data on the time between confirmation of predation and compensation should be included in the plan, and a goal should be to make this short.

2. I generally approve Phase III lethal removal, but not controlled hunts under any circumstances, as controlled hunts are not really controllable.

3. I do not approve of controlled take of wolves to control ungulate populations under any circumstances or for any reason. Controlling ungulate populations is, itself, an oxy-moron. ODFW should reevaluate the idea of controlling ungulate populations. It is too complicated.

4. There is a typo line 11, p.37.

Thank you for the care you take with this sensitive matter.

Gary Gregor
1185 Winsor Ave.

North Bend, OR, 97459

And
63744 Fort Rock Rd.
PO Box 96
Fort Rock, OR, 97735
Nbgregors@charter.net

My wife and daughter approve of my comments.

Roxann B Borisch

From: gregg hargett <hargettlaurie.gregg@gmail.com>
Sent: Saturday, April 20, 2019 11:00 AM
To: odfw.commission@state.or.us
Subject: Wolves in Oregon

When you can look out your window and see a wolf within yards of your front porch just 10 minutes outside of town, there is a problem. There is not enough wilderness for all these animals. Our declining deer herds cannot take an increase in any more predators. Anytime there is protection for predators the system is thrown out of balance. Now that the wolves are here we will have them but their numbers **MUST** be held in check. Someone with common sense must make the call. Emotion has no place in wildlife management and these animals are ruthless killers and are hated by most that have to deal with them. It should not be more important to save some wolves that are killing cattle than to keep the the livestock or pets safe. We must be able to manage them.

Scanned
4/22/19 J80

ODFW Mailroom

APR 03 2019

Received

TESTIMONY: REVISED WOLF CONSERVATION AND MANAGEMENT PLAN

March 31, 2019

H. Brent Lewis, CPA
1910 Foley St
La Grande, OR 97850

ODFW Commission
4034 Fairview Industrial Drive SE
Salem, OR 97302

ODFW

APR 22 2019

Director's Office

Commissioners:

I have not hunted big game for 20-years, but am a sportsman concerned for all wildlife in Oregon. I am an avid outdoor enthusiast and conservationist. I am a life-time resident of Oregon, age 70.

Since wolves have become established beyond the original compromise setting the number of required successful breeding pairs East of 395, and since wolves have expanded their territory to other parts of Oregon where habitat has been favorable to their success and continued survival, **I respectfully request you accept this letter as my testimony to approve the revised *Wolf Conservation and Management Plan*.**

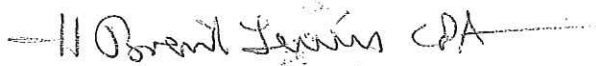
Conservationists such as me have already been compromising by accepting the presence of wolves in our state.

Conservationists such as me recognize a responsible management plan must consider all interests of Oregon citizens, including those who do not hunt deer and elk. You now have such a plan before you.

I work with many livestock producers who utilize private land and hold public land permits for livestock grazing purposes. These producers bear the greatest financial burden due to predation losses they continue to experience. It is time Oregon Department of Fish and Wildlife have the authority to manage wolf population numbers the same way management is applied to cougar and black bear populations in their jurisdiction.

Our continued acceptance of wolf populations in our State must be complimented by a responsible management plan considering interests of all Oregon resident citizens. The **revised *Wolf Conservation and Management Plan*** is a valid compromise for all citizens living in Oregon. Again, **please approve it.**

Respectfully,



H. Brent Lewis, CPA

Scanned
4/22/19 J60

Staff of ODFW

I was never in favor of the reintroduction
of wolves in Oregon.

However what I understood is they have
passed their population goals.

It is now time to have some form of
control.

It will only reduce Elk and Deer numbers.
which may cause less interest in hunting
and fewer tag and licence sales reducing
ODFW revenue.

Daryl Russell.

ODFW

APR 22 2019

Director's Office



Daryl Russell
1586 Hummingbird Ln.
Stayton, OR 97383

503 769 2930



Daryl Russell
1586 Hummingbird Ln.
Stayton, OR 97383

RECEIVED MAIL ROOM

15 APR 2019 PM 5 L

ODFW Commission
4034 Fairview Industrial Dr
Salem OR 97302

ODFW Mailroom

APR 11 2019

Received

57302-114234



Scanned
5/9/19 JSS

P O Box 487
Corvallis, Oregon 97339-0487
May 6, 2019

Oregon Fish and Wildlife Commission
Mr. Michael Finley, Chairman
4034 Fairview Industrial Drive S. E.
Salem, Oregon 97302

ODFW

MAY 08 2019

Director's Office

Subject: Proposed Oregon Wolf Conservation and Management Plan.

Ladies and Gentlemen of the Commission: Director Melcher:

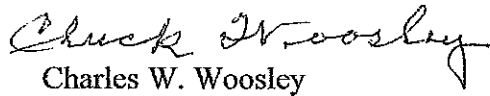
It pleases me that the proposed Oregon Wolf Conservation and Management Plan (Plan) draft dated April 12, 2019 uses an adaptive management approach. However, **please do not** approve this proposed Plan. This Plan does not provide for population control of gray wolves by hunting or trapping methods.

It is apparent that this "apex predator" is rapidly becoming established throughout Oregon. I strongly feel that it is **imperative** that the population of these "apex predators" be maintained at a low number. I also strongly feel that **rigidly controlled fair chase hunting and trapping** should be among the methods used for the removal of excess wolves.

Hunting is one of the key elements used by managers of wildlife to achieve the goals of the very successful **North American Model of Wildlife Conservation**. I firmly believe that including provisions in this plan for tightly regulated hunting and trapping would be **very prudent and appropriate** in this conservation and management Plan. **The Plan will be incomplete and unacceptable to me without the provisions for the hunting and trapping of the gray wolf.**

Please amend this draft Plan to include provisions for tightly controlled hunting and trapping.

Thank you,


Charles W. Woosley

RELATED AND RELEVANT ADDENDUM

A cousin owns and operates a large domestic sheep, cattle and haying operation in central Montana. Approximately five years ago, wolves attacked his sheep herd during two successive nights. The wolf attacks resulted in the destruction of 30 to 35 domestic sheep as I recall. As a result of these wolf attacks, my cousin purchased three large, very aggressive watch dogs. Wolves still visit the area of this agricultural operation, however, they avoid the domestic livestock.

Roxann B Borisch

From: Laurel Hines <laulehines@gmail.com>
Sent: Monday, April 22, 2019 11:02 AM
To: odfw.commission@state.or.us
Subject: wolf plan comment

To Whom It May Concern,

I am very concerned about changes to the wolf plan. Mainly that many of the conservation based advocates who were on the committee to update the wolf plan reportedly withdrew due to breakdowns in communication. It seems to me that the ranchers, who have an almost religious hatred of wolves, and some of the hunters, who see them as competition for deer and elk, are too uncompromising. They often refuse to accept the biological science that shows that wolves and other top predators are necessary for healthy biodiversity.

Livestock losses happened, and many more happen from weather and disease. Ranchers had had it easy for a long time without wolves, and hunters had little competition except from other humans. To have a healthy ecosystem and preserve the wolves for future generations, we need to help ranchers and others accept the conflicts that wolves may present.

I support guidance to ranchers on how to avoid conflict, but believe they should have to cover at least some of the cost. They should not expect to release easy prey like sheep or goats to large unprotected areas where wolves are present, nor have cattle calving unprotected.

Those of us who live with lots of coyotes around have learned to take precautions and do what we can to avoid conflicts; ranchers in areas of wolves should do the same.

Wolves are intelligent animals with complex social systems. They should not be considered trophy animals or "fur bearers" to be killed to provide a trophy pelt to hang on a wall or stuff. Even killing one family member of a pack disrupts the pack and can make them even more likely to get desperate and create conflicts. Even if that doesn't happen, it is cruel and not needed. Oregon is far from overrun with wolves.

Sincerely,

Laurel Hines, resident of rural area south of Salem, Oregon

Roxann B Borisch

From: ROD ADAMS <radams@bendbroadband.com>
Sent: Wednesday, April 24, 2019 11:26 AM
To: odfw.commission@state.or.us
Subject: Support draft wolf plan

Categories: Forwarded to Wildlife

Commissioners;

I encourage you to vote for approval of the revised Wolf Plan. This would still allow for the expansion of Wolf populations while maintaining some controls for the protection of Wildlife and Livestock in the rural portions of the State that have the Wolf populations and the problems associated with that. If most of the objections for approving this plan is the lack of Wolves in the Western part of the State, maybe you could recommend that a few pair can get re-located closer to the Urban centers to add to their pleasure of helping out the Wolf populations. The Oregon Hunters Association has approved the new revised plan that will still keep Hunting as a valuable tool in managing Wolves in the State, lowering the costs of Wolf populations that are damaging Wildlife or Livestock populations. Please keep Oregon in front of the Wolf situation and not playing catch-up to a growing problem. Look to adjoining States for the problems with and remedies for their own Wolf populations and what seems to work to our advantage in dealing with them.

Thank You

Rod Adams\Bend, Or.

radams@bendbroadband.com

Roxann B Borisch

From: Marshall Spencer <MarshallS@harsch.com>
Sent: Friday, April 26, 2019 10:50 AM
To: odfw.commission@state.or.us
Subject: wolf plan

I strongly prefer to have protections remain in place for wolves throughout the US in order to restore balance and health in the ecosystem. I am also unalterably opposed to the use of cyanide or similar poisons to control predators in general.

Roxann B Borisch

From: Midge Raymond <midge@midgeraymond.com>
Sent: Monday, April 29, 2019 3:04 PM
To: odfw.commission@state.or.us
Subject: Please do not allow wolf hunting or killing in Oregon

I am very much opposed to the ODFW's proposed Wolf Plan.

With only very modest growth (13 more animals in 2018), wolves in western Oregon need federal Endangered Species Act protections to allow them time to recover and disperse.

Unfortunately, the ODFW's Wolf Plan, which opens the doors to hunting and trapping of a species still recovering, does a huge disservice to the best available science and undermines what the majority of Oregonians want. It is counter to good science and counter to Oregon's values.

I moved to Oregon to enjoy its wildlife and its natural beauty. By allowing wolf hunting and the continued culling of wolves, the entire ecosystem will continue to be irreparably disrupted.

Please do the right thing and protect Oregon's wolves — and, therefore, the reasons that people choose to live in this state.

Midge Raymond
midge@midgeraymond.com
www.MidgeRaymond.com

Roxann B Borisch

From: Skitter B's iMac <skitterb@frontier.com>
Sent: Tuesday, April 30, 2019 6:43 AM
To: odfw.commission@state.or.us
Subject: revised Wolf Management Plan

Categories: Forwarded to Wildlife

Please consider adding the following to the plan:

- A) Establish management objective numbers for wolves in each designated wolf management zone.
- B) Include in annual wolf surveys the voluntary reporting of wolf sightings by sportsman.

Thank you.

Bob Ludlum
Tigard
sportsman/volunteer/outdoor guide

Roxann B Borisch

From: Ed Lee <elcri45@gmail.com>
Sent: Tuesday, April 30, 2019 8:13 AM
To: ODFW Commission
Subject: Wolf Management

Categories: Forwarded to Wildlife

I am writing to strongly urge the Commission to NOT adopt any plan which would allow for the hunting or trapping of wolves in the State of Oregon. Why would the Commission want to follow the lead of Idaho and other states which implement plans to eradicate all wolves; certainly we are better than that in managing our wildlife. I don't understand why the Commission lets the hunting and ranching interests determine the fate of our wildlife. And why would anyone in their right mind think that there are too many wolves in Oregon with a wolf population of just over a hundred. How many cows are in this state? Millions I would suppose. Why not open a hunting season on cattle. People kill and eat them anyway. And trapping wolves? Are you still living in the dark ages. Do you enjoy the thought of animals suffering and dying a slow death. You relish that? So make the smart decision and save what few wolves we still have. And stop letting the trophy hunters and ranchers tell you how to run this state's wildlife management plans. Can you do that?
Ed Crist

Sent from [Mail](#) for Windows 10

Roxann B Borisch

From: Susan Stumpf <stumpf_s@yahoo.com>
Sent: Wednesday, May 1, 2019 10:20 AM
To: odfw.commission@state.or.us
Subject: Protect Oregon's Wolves!

ODFW Commissioners
Oregon Department of Fish and Wildlife

RE: Protect Oregon's Wolves!

Dear ODFW Commissioners,

Dear Commissioners:

I'm writing you because I am concerned about the Department of Fish and Wildlife's proposal for Oregon's wolves. I am deeply opposed to the proposed focus on killing wolves to address livestock depredations. Not only are ranchers already being compensated for their losses, but recent studies have continued to show that killing wolves is ineffective at curbing livestock losses or preventing future conflict. It is purely retribution and has no place in state policy aimed at resolving these issues in the most efficient and effective way possible.

I would request that you reject the Department's proposal, and ask the agency to refocus its efforts on a plan that prioritizes non-lethal, preventative measures. These have proven to be the most cost-efficient and effective means at curbing livestock losses and preventing future conflict.

The Department is unfortunately attempting to stick to what is familiar, and push forward a plan that simply requires agency staff to do the least amount of work. Although a focus on conflict prevention might require more work and coordination by the Department, it is a system that commits livestock producers to proven conflict-prevention measures.

The Department needs strong guidance from you now!

Thank you for considering my comments.

Sincerely,
Susan Stumpf
PO Box 5412
Eugene, OR 97405

Roxann B Borisch

From: Susanna DeFazio <susiklare@yahoo.com>
Sent: Wednesday, May 1, 2019 8:33 AM
To: odfw.commission@state.or.us
Subject: Ensure Strong Protections for Oregon's Wolves!

ODFW Commissioners
Oregon Department of Fish and Wildlife

RE: Ensure Strong Protections for Oregon's Wolves!

Dear ODFW Commissioners,

Dear Commissioners:

I strongly oppose the killing wolves to protect cows. I request that you rather work toward development and implementation of non-lethal ways to minimize predation of livestock.

This is no time for ODFW to be lazy and resort to killing. ODFW should be working towards restoration of healthy ecosystems, which require predators to function as nature intended. I find it appalling that ODFW would support our continuing unraveling of the natural world.

Thank you for considering my comments.

Sincerely,
Susanna DeFazio
Walton, OR

Sincerely,
Susanna DeFazio
87805 Walker Creek Rd
Walton, OR 97490

Roxann B Borisch

From: kathleen kinkel <kkinkel00@gmail.com>
Sent: Thursday, May 2, 2019 6:06 PM
To: ODFW Commission
Subject: Wolf Plan Vote

I see the wolf plan is back on your agenda. I am writing to ask that you vote to accept the plan as it is currently written.

This is the time to take the plan to a commission vote. Management tools are provided for in the plan as well as implementing protection for the existing and future packs.

I urge you to please vote for the plan.

Kathleen A Kinkel
4150 Beck Ave SE
Salem, OR 97317

Roxann B Borisch

From: Evelyn Roether <evelynkr@gmail.com>
Sent: Friday, May 3, 2019 8:49 AM
To: odfw.commission@state.or.us
Subject: Protect Oregon's Wolves!

ODFW Commissioners
Oregon Department of Fish and Wildlife

RE: Protect Oregon's Wolves!

Dear ODFW Commissioners,

Dear Commissioners:

I'm writing you because I am concerned about the Department of Fish and Wildlife's proposal regarding Oregon's wolves. I am deeply opposed to the proposed focus on killing wolves to address livestock depredations. Ranchers are already being compensated for their losses, in spite of the fact that recent studies have continued to show that killing wolves is ineffective at curbing livestock losses or preventing future conflict. It is purely retribution and has no place in state policy aimed at resolving these issues in the most efficient and effective way possible.

I would request that you reject the Department's proposal, and ask the agency to refocus its efforts on a plan that prioritizes non-lethal, preventative measures. These have proven to be the most cost-efficient and effective means at curbing livestock losses and preventing future conflict.

A focus on conflict prevention requires some effort and persistence by the Department, but it is a system that commits livestock producers to proven conflict-prevention measures.

Please prioritize non-lethal, preventative measures to protect the few wolves we have in our State.

Thank you for considering my comments.

Sincerely,

Evelyn Roether
PO Box 489
Williams, OR 97544

Roxann B Borisch

From: Donna Joslyn <joslyndonna@gmail.com>
Sent: Friday, May 3, 2019 5:49 AM
To: odfw.commission@state.or.us
Subject: Proposed Wolf Conservation and Management Plan

Dear ODFW,

I would like to comment about the proposed management plan. I **do not** agree with the heavy-handed approach to wolf management in Oregon.

Wolves should **not** be delisted as long as people have a bloodlust to torture and kill wolves. Selling hunting licenses to kill an animal as social in its family units as a wolf is beyond immoral. Killing pack members (and relocation) disrupts their ability to hunt elk and deer and promotes the taking of easier prey ie. cows and sheep. This is called **a self perpetuating industry of wolf control** and should be condemned.

Let's not follow the dismal examples of Idaho, Montana and Wyoming in inflicting so much suffering and heartbreak on the wolves themselves and the people who want and welcome them here—that happens to be an 80% majority, while the very vocal minority seems to have the power to persuade federal agents to do their bidding. I would like my voice heard and the wolves protected, as is your mandate and perhaps deep down, your humanity.

Thank you for the opportunity to comment.

Sincerely,

Donna L. Joslyn

208.720.6426 Tele

Roxann B Borisch

From: Joanie Beldin <joanibldn@gmail.com>
Sent: Friday, May 3, 2019 9:51 AM
To: odfw.commission@state.or.us
Subject: Revised Wolf Management and Conservation Plan

Categories: printed, Forwarded to Wildlife

Dear Chair Findley and ODFW Commissioners,

I'm writing with deep concern about the direction ODFW is taking in regards to the revised Wolf Plan.

For the past five years I have been teaching science-based wolf education to our young people. Their responses has made it clear that they want to have a healthy recovered population of wolves in their future. ODFW's mission mandates that our wildlife and habitats are protected for future generations. To that end, I am asking that you hold ODFW accountable for creating a science based Wolf Plan that will bring meaningful recovery for our wolves.

I **strongly oppose** the following elements of the proposed Wolf Plan:

1. The proposed standard for "chronic" depredation - Two depredations in 9 months does *not* demonstrate chronic behavior and will only make it easier to kill wolves. Chronic behavior for the wolves is hunting their natural prey. Killing one or more wolves after only two depredations is indefensible and will not allow adequate time for effective and meaningful non lethal measures to work. Scientific research has demonstrated that killing wolves can increase, not decrease, depredation. <https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0189729>
2. Training public hunters as "special agents" to kill depredating wolves. The grave act of killing any wolf should always remain in the hands of professionals. Given the anti-wolf sentiment that exists, I am deeply concerned about the risk of any wolf's location information being provided to the public. This information could inadvertently finding its way into the hands of potential poachers. Since 2015, at least ten wolves hen confirmed poached or have died suspiciously. Wolf location information must remain within the agency.

Trapping should not be included as a method of control. Traps are cruel and indiscriminate.

3. The lack of clear, transparent, defensible, and enforceable standards to *prevent* conflict. No wolf should ever be killed without non-lethal measures being effectively and adequately used. Appropriate non-lethal methods used over an adequate period of time need to be required before kill permits can be issued. Oregon's Wolf Plan must prioritize non-lethal measures over killing wolves. Killing wolves must be an absolute last resort option.

Oregon's wolves are vital keystone species who increase the health and balance of Oregon's landscape as their presence increases biodiversity. As such they deserve a science based Wolf Plan that clearly values our wolves and provides for meaningful recovery.

Thank you for your consideration.

Sincerely,

Joan Beldin

10223 N. Hudson St. Portland, Oregon 97203

Roxann B Borisch

From: Paul Donheffner <paul4oha@gmail.com>
Sent: Monday, May 6, 2019 9:20 AM
To: odfw.commission@state.or.us
Subject: Approval of Wolf Plan

Categories: Forwarded to Wildlife

As a life member of OHA and RMEF, I am writing to strongly encourage the Commission **to adopt** the updated WOLF PLAN, which is long overdue. The time to act is now, at your June meeting. No more delays, please.

Please consider the following:

- OHA supports this most recent version of the draft management plan.
- The plan provides ample protection for this species in Oregon.
- The plan provides management tools for protected other valued resources and activities, such as maintaining game populations and big game hunting.
- The determination of management zones and controlled hunting is well identified within this plan, and we support these developments.
- OHA would like to also see management objective numbers established for wolves in designated wolf management zones.
- Sportsmen would like to give recognized input to annual wolf surveys – modelled after the system used in Montana.

The wolf population in Oregon continues to expand. The wolves here are just a fraction of the population in the western US, including WA, ID, MT, WY, plus Canada. In a broad view, wolves are doing well, and the Federal Government should also delist them to allow more state management. And that is why this plan is so important and should be adopted without further delays.

Please vote to adopt the Wolf Plan at the June 7 meeting.

Sincerely,

Paul Donheffner, Salem

Roxann B Borisch

From: Jay Walsh <jaywalsh69@gmail.com>
Sent: Monday, May 6, 2019 11:34 AM
To: odfw.commission@state.or.us
Subject: grey wolf

Categories: printed

First off, I don't think wolves should be protected, and I don't agree with re-introducing Wolves, anywhere. I don't mind having Wolves in area's where they've lived and existed in the wild for a long time. But to re-introduce them I think is a bad idea. The impact on our Deer and Elk populations is enough to warrant this. Then you have the ranchers losses. I just don't think there's room for these large predators in the lower 48. They will always come into conflict with humans. It's a waste of tax payers money, and a huge loss to ranchers.

--

Jay Walsh
Concierge Services, Public Relations
Team Sell Bend, Shelly Hummel
Keller Williams Realty Central Oregon
595 NW York Dr, Suite 100, Bend, OR 97703
jaywalsh69@gmail.com
541-480-5310

Roxann B Borisch

From: Roger W. Sherman <xx32547@comcast.net>
Sent: Thursday, May 9, 2019 10:25 AM
To: odfw.commission@state.or.us
Subject: Wolf Plan

Categories: printed

To all concerned:

I am in favor of delisting wolves and managing them like all other big game species, and I support the current Wolf Plan. Wolf numbers and wolf distribution now warrant delisting. It is time for state agencies to determine appropriate management and protection measures in their states.

Roger Sherman
Portland, OR

Roxann B Borisch

From: Anne Kinsey <oca@orcattle.com>
Sent: Thursday, May 9, 2019 10:56 AM
To: odfw.commission@state.or.us
Subject: Wolf Plan Comments
Attachments: Wolf Plan Comments-Huffman.pdf

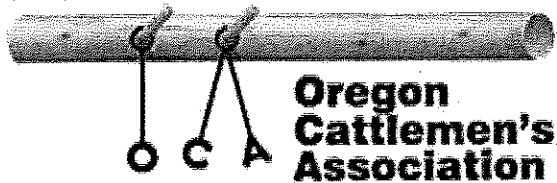
Categories: printed, Forwarded to Wildlife

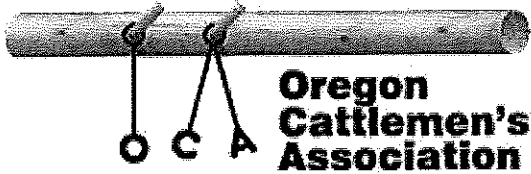
Please accept the attached commentary on the proposed Oregon Wolf Plan.

Thank you.

Anne Elise Kinsey

OCA Office Administrator
1320 Capitol St NE, Suite 150
Salem, OR 97301
(503)361-8941





1320 Capitol Street NE, Suite 150
Salem, Oregon 97301
503-361-8941
orcattle.com

May 9, 2019

Oregon Dept of Fish and Wildlife
Salem, OR

RE: Testimony on Wolf Plan Update

Thank you for the opportunity to comment on the proposed wolf plan update. We appreciate the hard work that has gone into this by the Commission, ODFW staff and the stakeholders. The Oregon Cattlemen's Association has worked closely with partners and staff to make the plan better and more balanced toward management, versus tighter conservation standards.

We can live with the proposed chronic definition in phase 3 as it more realistically reacts to situations that may require quicker actions to resolve. We also appreciate the added language for collaring in phase 3, we feel it is extremely important and the right thing to do for good management.

While the proposed plan is a better version for the livestock industry than the one released a year ago, it still could go further toward defining maximum populations by management areas or zones statewide. It fails to define a clear path when we reach physical carrying capacity, locally or statewide. In addition, we feel decision making by trained local district biologists is preferred over decisions potentially tainted by politics at higher levels, when dealing with clear wolf predation evidence in potential confirmations.

Again, we appreciate all the efforts put in over the years to get to this point and thank you for the opportunity to be involved. We pledge to work toward normal wildlife management for this species as very soon the impacts felt by the livestock industry will be felt by all rural Oregonians, and the need for population control will be more obvious and necessary.

Respectfully Submitted,

Rodger Huffman
Wolf Committee Chair-East

Veril Nelson
Wolf Committee Chair-West

Roxann B Borisch

From: renelson@teleport.com
Sent: Thursday, May 9, 2019 3:53 PM
To: ODFW commission
Subject: Wolf Plan

Categories: printed

I support adopting the draft wolf plan. All predators must be managed, humans learned along time ago that we must manage ourselves through seasons and bag limits to preserve a healthy and sustainable wildlife population. The time has passed when wildlife can move on to escape predators, wolves have the capacity to drastically reduce prey to unstainable levels and have.

Richard E. Nelson
61394 Ward Rd.
Bend, Oregon 97702.

Roxann B Borisch

From: Tom Bailey <elkhunter06@gmail.com>
Sent: Friday, May 10, 2019 8:43 AM
To: odfw.commission@state.or.us
Subject: Wolves in Oregon

Categories: printed

To who this applies to .

My name is Thomas Ray Bailey

Ive have lived in great state for 50 years . Ive hunted this state both west side and eat side sense I was 12 years old I enjoy spending every chance I get to go to the timber to hike Hunt and just spend time in the woods . Here Lately I have noticed there is less big Game I hunt primarily the Chesnimnus and Ukiah, Starkey units . Sense Wolves have been reintroduced to Oregon have seen a decrease in the herds of ELK and DEER .H ave been sitting in a tree stand and seen elk being chased by pack of wolves this last season in UKIAH . There is a big problem and it time to delist WOLVES off the endangered species . They are not wolves that were here 100 years ago they are bigger and kill for the thrill .

Sencerly Oregon Hunter .

Thomas Bailey.

Subject:

FW: WOLF PLAN RECOMMENDATION

From: JEFF FREEMAN <jfreeman63@charter.net>

Date: May 12, 2019 at 7:06:45 PM PDT

To: "michelle.N.Dennehy@state.or.us" <michelle.N.Dennehy@state.or.us>

Subject: WOLF PLAN RECOMMENDATION

Michelle - excuse the familiarity, but inasmuch as your email address alludes to no Ms, Mrs or anything

I am Jeff Freeman, Roseburg resident, and I've a probably premature suggestion regarding the impending "wolf plan". It's based on the Alaska Brown Bear harvest/reporting regulations; I recommended a similar harvest reporting time frame be applied to Oregon's cougar system - which I lobbied for with one of your colleges (Mr. THORTON I believe, but I could be mistaken) in the late '90's. A change was eventually made to the Oregon hunting regulations permitting an extended period (10 days?) in which to report cougar kills.

Assuming (I know, I know..), the "wolf plan" determines Oregon wolves become a game animal, understandably myriad and confusing details are sure to follow. I see wolves' regulations mirroring some former cougar regs. Accordingly, I'd recommend wolf harvest reporting details get "ahead of THAT particular curve", and allow hunters reasonable time to report a wolf harvest (perhaps 10 days like cougars). Unless wolves become a draw hunt (which I suppose they might!?), I'd think they'll only be as cougars, an incidental harvest.

Why -might you ask - doesn't this bozo attend the meeting? Because ma'am, I fear a "wolf meeting" will be fraught with politically-correct umbrage and equally emotional rancher reasoning. However, thankfully, I'll be out of Oregon when the meeting is scheduled - whew!

I apologize for the diatribe, but my original suggestion for a reasonable harvest report is still applicable. Thank you for your time and consideration.

- Jeff Freeman

Roxann B Borisch

Subject: FW: Defenders of Wildlife_Comments Letter_Oregon Wolf Plan
Attachments: Defenders of Wildlife_Comments Letter_Wolf Plan.pdf; Defenders_ Proposed Oregon Wolf and Livestock Conflict Prevention Program.pdf

From: Sristi Kamal <SKamal@defenders.org>
Sent: Sunday, May 12, 2019 10:48 AM
To: odfw.commission@state.or.us
Subject: Defenders of Wildlife_Comments Letter_Oregon Wolf Plan

Dear Chair Finley, Commissioner Akenson, Commissioner Buckmaster, Commissioner Bittle, Commissioner Wolley and Commissioner Weber

On behalf of Defenders of Wildlife, I would like to submit the attached letter and supplemental material to you ahead of the proposed rulemaking on the Oregon Wolf Conservation and Management Plan on June 7th. The letter summarizes our key concerns with the proposed revisions to the Plan, our standpoint on some of the key issues that were not captured adequately during the stakeholder process as well as potential solutions to some of the main challenges in wolf conservation in Oregon.

I hope you take this letter into consideration while deliberating over the Wolf Plan. I would be happy to address any further questions you might have regarding the content of the letter or the Wolf Plan itself.

Thanking you

Sincerely

Sristi



Sristi Kamal, Ph.D.
Senior Northwest Representative

DEFENDERS OF WILDLIFE
4110 SE Hawthorne Blvd. PMB 992
Portland OR 97214
TEL: 971-254-317 FAX: 202.682.1331
[Facebook](#) | [Twitter](#) | [Instagram](#) | [Medium](#)

Visit <https://defenders.org/>



Northwest Office

1402 Third Avenue, Suite 930 | Seattle, Washington 98101 | tel 206.508.5474

www.defenders.org

May 13th, 2019

Oregon Fish & Wildlife Commission
4034 Fairview Industrial Drive SE
Salem, OR 97302

Re: Comments on ODFW's notice of proposed rulemaking on Oregon Wolf Conservation and Management Plan

Dear Chair Finley and Members of the Commission:

We are writing to provide our comments and guidance regarding the update of the Oregon Wolf Conservation and Management Plan (Wolf Plan) in response to the Oregon Department of Fish and Wildlife's (ODFW) Notice of Proposed Rulemaking filed on April 8, 2019. Defenders of Wildlife (Defenders) is deeply committed to gray wolf recovery in Oregon and throughout the Pacific Northwest. We are eager to contribute to an update of the Wolf Plan that maintains Oregon's leadership on wolf conservation and embraces the values of coexistence – especially considering ongoing federal attempts to reduce protections for gray wolves. On February 8, 2019, Chair Finley announced that the adoption of a revised Wolf Plan would be postponed allowing everyone more time to review the Wolf Plan and Commissioners more time to talk with constituents. Defenders would welcome the opportunity to talk with Commissioners about the concerns, proposed solutions, and opportunities for collaboration presented in these comments.

Defenders is a national non-profit conservation organization with more than 1.7 million members and supporters nationwide and more than 34,000 members and supporters in Oregon. Defenders is a science-based advocacy organization focused on conserving and restoring threatened and endangered native species and the habitat upon which they depend. Over the last 15 years, Defenders has co-sponsored the first Oregon range rider project with ODFW; helped organize wolf monitoring and depredation investigation trainings; helped Oregon set up its own compensation program; funded countless nonlethal measures to help protect livestock and wolves; and continue to sponsor nonlethal workshops and presentations throughout the state, the latest being in March 2019. Our commitment to working with communities to empower them to coexist with wolves is reflected in our actions on the ground.

Defenders was one of four conservation organizations in the Wolf Plan Stakeholder Representative (WPSR) process to provide input on the Oregon Wolf Conservation and Management Plan update. However, we withdrew from the last stakeholder meeting in January 2019 because the Oregon Department of Fish and Wildlife (ODFW) communicated that it would begin rulemaking before the final meeting – which meant that there would be no opportunity for meaningful input or dialogue on ODFW's proposed revisions to the plan. This exemplified the concerns about the WPSR process that we raised at the outset.

Our comments below are organized into three sections:

- 1) Defenders' response to ODFW's Notice of Proposed Rule Making, including key issues that were discussed in during the WPSR process but not considered by ODFW in the final update
- 2) Defenders' concerns about the WPSR process and suggestions for process improvements
- 3) Defenders' suggestion on reforming and improving the Wolf Depredation Compensation and Financial Assistance Grant Program

Defenders remains committed to ensuring the continued recovery and dispersal of Oregon's wolf population throughout its historic range – and to working with communities sharing the landscape with wolves to minimize both wolf and livestock losses. To that end, Defenders submits our comments and recommendations on the proposed revisions to the wolf plan for the Commission's consideration.

1. Defenders' response to ODFW's Notice of Proposed Rule Making

a) Hunting and trapping of wolves by individuals other than government agency staff should not be included in the Wolf Plan.

i) The proposed revision of Section III (Wolves as Special Status Game Mammals) in the Wolf Plan contains several provisions that open the door to hunting of wolves in Oregon -- an issue we are strongly opposed to for the species. The proposed revision makes an explicit allowance for controlled hunts as a "management" measure and lethal take through Oregon Fish and Wildlife Commission's rulemaking process. It states that: *"Controlled hunts (e.g. planned hunts or seasons where the number or distribution of hunters is limited through a public drawing or other means) require Commission approval through the planning and hunt development public process"*. We have consistently opposed the hunting of wolves by civilians in any form throughout the stakeholder process and in every opportunity for public comment.

This clause in the proposed revision of the Plan disregards polling that demonstrates widespread opposition to hunting wolves, scientific evidence that hunting can suppress wildlife populations occurring at low levels, and the growing body of evidence that hunting can lead to increased poaching. It is premature to even discuss hunting of wolves. In terms of the species' ecology and population status, the 2018 annual Wolf count reports 137 wolves in the whole state, a modest 10% increase. At the end of 2018, the Wolf Plan conservation objective of four breeding pairs for three years had not been reached in the West Wolf Management Zone (WMZ). Yet, they are already delisted statewide under the Oregon List of Endangered Species and are only protected as a special status game mammal. There is no compelling reason to hunt wolves under these circumstances. As we noted in the last stakeholder meeting that we participated in, if there were only a few hundred of any other species left in the state, regardless of the population trend, there would be no discussion about hunting that species. This is a highly divisive issue that needs to be dropped from the Plan.

ii) Related to the point above, previous Wolf Plan revisions proposed the creation of a "Special Permit Agent" which would allow private citizens to hunt wolves targeted by the agency for lethal removal, through a Commission approved permit process. While ODFW updated the language to remove the reference to a "Special Permit Agent", they essentially kept the function and the role: *"Controlled take would be by ODFW special permit authorization..."* The Plan also explicitly states the use of members of the public to fulfill ODFW responsibilities in lethal take and therefore opening the door to public hunting of wolves: *"Controlled take by the public through hunting and trapping may be used in two circumstances"*

as a management response tool to assist ODFW wildlife conservation and management efforts. i) Long term, recurring depredation of livestock.... ii) Wild ungulate populations not meeting established management objectives or herd management.”

iii) Section III also provides that: “...trapping may be used for lethal management control. Before receiving a permit authorization from ODFW, trappers must be approved by ODFW.” We oppose this and any measure that allows ODFW to outsource their duty to private citizens in any way that promotes hunting and trapping of wolves in Oregon. We also oppose the fact that the revision in the Plan still allow for civilians to trap wolves by permit, and at the same time, does not explicitly prohibit trappers from keeping the hide or carcass. Private hunting or trapping should not be included or incentivized by the Plan.

b) Non-lethal measures must be an integral part of livestock management with clear requirements and incentives to implement them.

Since 1999, Defenders has focused on promoting a coexistence approach in wolf recovery and management in Oregon. We have supported policy measures that provide resources to landowners on use of non-lethal tools and have conducted several trainings and workshops on non-lethal measures. In 2018 and 2019, we helped ODFW sponsor a series of successful rancher-driven workshops held near Pendleton, Baker City, Halfway, and Klamath Falls that saw more than 100 ranchers participating in these workshops. During the WPSR process we proposed site specific non-lethal management plans and the development of a statewide non-lethal deterrence program. However, the discussion on non-lethal proposals was prematurely tabled, and ODFW’s proposed revision does not incorporate or address our suggestions.

Notes from the January 7th WPSR meeting indicate that non-lethal methods were discussed but only to highlight that “ODFW found it would not be feasible to write individual plans for all ranchers.” We believe this proposal was not given adequate consideration or analysis. Except for two ODFW position descriptions that are currently unfunded, there is no other significant advancement of non-lethal strategies to address growing conflicts between livestock operations and wolves. This program would help producers make proactive deterrents and livestock husbandry methods work for them and their specific farm, ranch or grazing allotment through one-on-one expert help to plan and implement nonlethal predator deterrent strategies to avoid losses to wolves and other predators. The program would be a natural supplement to the existing county programs that provide funding assistance to implement nonlethal measures but currently have no way of evaluating which methods are the best options for specific sites. This program would reduce loss of livestock, improve grazing and herding methods and carcass clean up strategies, and reduce impact on wild predator populations.

Despite ODFW’s skepticism regarding this proposed program, here are many examples of similar statewide programs designed to help landowners. They range from forestry management financial incentives and technical assistance programs (bark beetle, soil erosion, fire, and noxious weed programs to name a few), Wildlife Habitat Conservation and Management Program (WHCMP) administered by ODFW, a federal program to help landowners to mitigate drought, and more. Among these, the Good Agricultural Practices (GAP) & Good Handling Practices (GHP) is one of the most comparable to our proposed program. “The GAP & GHP audits are offered by the Oregon Department of Agriculture (ODA) under the USDA Federal-State Audit Program. GAP & GHP audits are provided by USDA-trained and

licensed ODA auditors in seven districts across the state of Oregon. With GAP & GHP certification, businesses can assure buyers and consumers that they have taken proactive measures to reduce the risk of contamination by adhering to generally recognized industry best practices.” These programs are statewide, feasible and effective in helping landowners on an individual basis.

ODFW must have an effective non-lethal program and a process to ensure that non-lethal tools were appropriately implemented before resorting to lethal control as the last option. We cannot support the use of lethal control where wolves are chronically and intentionally or unintentionally baited to a livestock site through unmanaged dead or diseased livestock. We will be happy to work with ODFW on developing a methodology for site prioritization that would help set priorities for assistance to get the program up and running quickly.

The WPSR process highlighted that all stakeholder groups would like to have measures and means for producers to be able to implement non-tools to avoid conflict in the first place. Hence, the revised version is not reflective of the key outcomes of the stakeholder process. ***Attached is an example of a non-lethal conflict deterrence plan for your consideration.***

c) ODFW’s proposed chronic depredation standard of two confirmed depredation in nine months is very concerning and not evidence based.

ODFW’s proposed definition of chronic depredation as “2 confirmed depredations in 9 months” is unacceptable. Two incidents in nine months in almost any other context (health, accidents, etc.) would never be considered chronic as “chronic” by definition, implies long-lasting and/or constantly recurring and two isolated incidents in nine months is neither. Standards for such last resort measures should be more stringent and we propose a minimum standard of three confirmed depredations that each involve more than three sheep or goats or more than one cattle in a consecutive nine-month period by the same wolves despite adequate nonlethal deterrent measures that have been consistently applied. This standard would help separate the occasional depredations that are largely inevitable when predators and livestock share the same landscape and the intentional and frequent (chronic) predation of livestock as a key food resource.

Additionally, ODFW must respond to chronic depredations by elevating risk assessment on sites where depredations occurred, recommending additional non-lethal measures when needed, and documenting non-lethal measures for a 6-month period prior to use of lethal wolf control measures. These are reasonable parameters before lethal control of wolves should ever be considered.

2. Defenders’ concerns about the WPSR process and suggestions for process improvements

Perhaps one of the biggest challenges of the WPSR process was ODFW’s shifting role – from stakeholder to facilitator to decision maker. ODFW is an interested party and should have participated as an equal stakeholder. This begs the question: Why was one of the stakeholder groups also in charge of preparing the document that was supposed to summarize and reflect the comments and inputs from the other stakeholder groups? We understand that it is ODFW’s role to implement the Wolf Plan. However, ODFW’s

proposed revisions to the Plan did not reflect the concerns, suggestions, or solutions provided by stakeholders during the meetings.

For instance, as mentioned above, the proposed revised Plan did not incorporate or address our suggestions around non-lethal measures and starting a site-specific non-lethal program in Oregon. Despite the time and effort invested by the stakeholder groups during the meetings on the role of non-lethal tools in mitigating and preventing conflicts, there was no other significant advancement of non-lethal strategies in the Plan. Additionally, ODFW's announcement of initiating rulemaking before the final meeting only reflected how the agency undermined the process and the contribution of the stakeholder groups to improving the Plan. The WPSR process ultimately did not present a meaningful opportunity for any inputs or dialogue on the proposed revisions of the Plan.

Ensuring that all important issues discussed in the meetings are documented in an unbiased manner and then used in the following meetings to reach collaborative solutions and update the Plan accordingly (with ODFW's support) was the agreed upon role of the facilitator, Kearns and West. Yet, throughout this process Kearns and West staff were never empowered to do their job. To ensure that the state benefits from its investment in a facilitator, we again request a neutral assessment of the process and outcomes from Kearns and West.

3. Opportunities for reforming and improving the Wolf Depredation Compensation and Financial Assistance Grant Program

The Wolf Depredation Compensation Financial Assistance Grant Program ("Compensation Program") is not part of the Wolf Plan revision process, however, they are closely connected. We believe there is an opportunity to improve the Compensation Program to make the implementation of the Wolf Plan more effective. Additionally, standards determined in the Wolf Plan (such as of chronic depredation, implementation of non-lethal tools etc.) inevitably impact the way funds are dispensed through this program.

The Compensation Program was created by the Oregon Legislature in 2011 when it unanimously authorized a new program to provide compensation and funding for proactive non-lethal measures to help livestock producers minimize losses while protecting wolves from unnecessary lethal control actions. This program was developed by the Oregon governor's office in a collaborative process that brought together Defenders of Wildlife, the Oregon Cattlemen's Association, Hell's Canyon Preservation Council, the Oregon Farm Bureau, and Oregon Wild. The legislation allowed for *"Compensation... paid to persons who suffer loss or injury to livestock or working dogs due to wolf depredation; and, financial assistance is provided to persons who implement livestock management techniques or nonlethal wolf deterrence techniques designed to discourage wolf depredation of livestock."* The Program is run by county committees set up to review requests and dispense funds.

In the eight years since the program was implemented, we have become increasingly concerned that these basic requirements are not being followed. There have been many notable incidents¹ where compensation is being paid in situations where there is no finding by the State Department of Fish and Wildlife or a designated agent that wolf predation "was the probable cause of the loss or injury" of livestock. Unfortunately, these cases are mounting and there appears to be a serious lack of adherence to the intent of the requirements at both the administrative as well as committee level. We have heard

these same concerns shared by committee members in every region where the program is currently being funded. These are grave concerns that could result in implications of fiscal mismanagement. Specifically, the program's criteria for paying for missing and unconfirmed livestock losses, prioritization of funds to high risk areas, and annual reporting system must be addressed.

New rules established by the Department of Agriculture (the main agency responsible for the Program) which included a provision allowing county wolf mitigation boards to pay *"Compensation for missing livestock or working dogs only when the animals in question became missing from within an area of known wolf activity..."* conflict with the original legislation's requirement of *"Evidence of the loss or injury must include a finding by the State Department of Fish and Wildlife or the department's designated agent that wolf depredation was the probable cause of the loss or injury"*. Allowing county committees to pay for missing livestock in lieu of this evidence is a violation of the intent of the program, which is now leading to highly questionable payments to livestock owners who have no evidence that wolves were involved in their missing livestock issues. Such provisions and its detrimental impact on wolves as well as the compensation fund itself, is a clear indication that the Program needs to be evaluated and fixed before any more vital funds are lost to unsubstantiated claims.

Defenders has discussed these issues with other stakeholders – including those involved in the county committees -- and we propose that the Commission work with ODA staff and stakeholders to convene a task force to evaluate and make recommendations to the existing program. This could also take the form of a legislative task force, working with legislators who have taken an interest in this issue. An opportunity for a collaborative process does exist, as was evident during current legislative session with HB 2746 (Changes to Wolf Depredation Compensation and Financial Assistance Grant Program), where legislators who are interested in adding resources to the compensation program can also aid the process of reforming the program by bringing stakeholder groups together to the table and discuss potential solutions. Such a task force could help draft legislation to fix existing issues with the program and secure additional funding.

The proposed Wolf Plan is ultimately not reflective of the key discussions that occurred during the stakeholder process and neither is reflective of the values that Oregonians care about deeply. As members of the Commission that represent the voices of all Oregonians, we urge you to take this opportunity to guide the agency toward a more reasonable, progressive and scientifically sound direction that will allow wolves to thrive alongside Oregonians – both groups call this state their home.

Thank you for your consideration of our comments. Defenders would be happy to provide further details and/or supporting materials at your request.

Respectfully,



Sristi Kamal
Senior Representative, Northwest Program



Suzanne Stone
Senior Representative, Northwest Program

¹ <https://www.opb.org/news/article/questionable-payments-oregon-ranchers-wolves-cattle>

Draft Oregon Wolf & Livestock Conflict Avoidance Program



Program Proposal Prepared by Defenders of Wildlife

From depredation risk assessment to herding management techniques, each ranch or farm in Oregon's expanding wolf range is best assisted by proactive, prevention-oriented guidance to minimize conflicts and losses of both livestock and native predators. The Wolf and Livestock Conflict Avoidance Program (WLCAP) helps livestock producers adjust to the challenges of living with wolves on the landscape through proactive and pragmatic nonlethal strategies to reduce risk of livestock losses.

This voluntary conservation program helps producers make proactive deterrents and livestock husbandry methods work for them. Together, the State of Oregon and producers develop solutions that conserve wild predators while also improving livestock operations.

Through WLCAP and the State of Oregon's Wolf Compensation and Coexistence Fund, livestock producers are assisted with financial resources and one-on-one expert help to plan and implement nonlethal predator deterrent strategies to avoid losses to wolves and other predators. Using these practices can lead to reduced loss of livestock, better grazing and herding methods and carcass clean up strategies, and reduced impact on wild predator populations.

How WLCAP Works

WLCAP first works one-on-one with livestock producers to assess their grazing site(s) or farm to develop a feasible predator deterrent plan. This becomes a road map for which livestock husbandry and predator deterrent practices best meet the site-specific needs.

Financial assistance through the County Wolf Compensation and Coexistence Committees can help cover part of the costs, if needed, to implement these proactive depredation deterrent practices. Many of the practices are low to no cost actions to help reduce potential attractants. WLCAP tailors the plan to where the land is located, type and age of livestock present, methods of livestock grazing, herding and birthing, proximity to known wolves, and types of tools and methods most feasible and effective for the situation. WLCAP will also establish statistical models of wolf depredation risk to assess the gradient of risk across the farm and grazing lands to help strategize and apply a grazing plan and the depredation deterrent practices.

Applications for assistance are ranked based on wolf depredation risk analysis that includes recommendations from the county wolf compensation and coexistence committees and state wildlife managers. Once a livestock operation is chosen, WLCAP will work with livestock husbandry and nonlethal predator deterrent specialists to develop a site risk assessment and conflict avoidance plan specific for your operation(s). Additional assistance is available on an urgent basis for livestock producers who

have not yet completed a plan but have urgent wolf activity related risks that require emergency predator deterrent intervention assistance.

WLCAP will also develop online resources including how-to videos, instruction guides, self-assessment recommendations and a list of experienced depredation prevention livestock producers (a coexistence council) to help mentor other livestock producers needed assistance.

Job Description: Oregon Department of Fish and Wildlife Wolf Conflict Prevention Specialist

Duties

Work in a joint capacity with the Oregon Department of Fish and Wildlife (ODFW) wolf program and the Oregon Department of Agriculture to promote, coordinate and implement proactive, nonlethal wolf conservation programs. Activities will include providing nonlethal technical assistance to landowners and livestock owners and managers regarding livestock husbandry and predator management including grazing, birthing and carcass planning operations; wolf monitoring; technical assistance related to nonlethal tools and methods assessment and implementation; site/risk evaluation; and GPS data investigation to help predict risk of depredation. Conduct and coordinate training sessions that include workshops and tours for landowners, livestock owners and resource professionals. Meet with local county wolf mitigation committees to advise and evaluate use of state funding for nonlethal efforts, outreach and planning. Develop educational outreach programs and information for online distribution. Assist or coordinate activities and projects as assigned.

The position will begin with a 90-day introductory period where training will consist of working in close contact with the ODFW State Wolf Conservation Coordinator and other state, tribal and federal agency wolf and livestock managers, researchers, and wildlife NGOs as needed. After the introductory period, the candidate will continue to have regular contact and receive direction from the ODFW State Wolf Conservation Coordinator with guidance from the nonlethal research specialists at the National Wildlife Research Center and other nonlethal deterrent and livestock husbandry experts. Candidate will advise the Oregon Department of Fish and Wildlife Commission as needed.

Required Knowledge Skills and Abilities:

- Excellent oral and written communication as well as assessment and planning skills.
- Must be comfortable with public speaking and have excellent conflict management skills.
- Must be able to work effectively with private landowners, livestock producers, governmental agency staff and conservation organization representatives.
- Ability to work independently with little supervision and with diverse personalities.
- Extensive knowledge of wolf and livestock management, rangeland management, nonlethal management techniques, principles, goals and objectives.

- Ability to design and implement innovative strategies for nonlethal management of native predators when possible.
- Experience with surveillance camera system installation and maintenance.
- Knowledge of conservation program offerings for private land, including USDA Conservation Programs (CIG, EQIP, etc.) and agricultural extension service
- Sound working knowledge of wolf behavior, livestock behavior and rangeland management including the ability to develop and implement a grazing and/or depredation avoidance management plan
- Ability to work under adverse weather conditions.
- Good computer skills including knowledge of: MS Word, MS Excel, GPS and ArcGIS.
- Interest in the application of scientific findings to conservation and management.
- Familiarity with predator depredation spatial risk models or interest in learning
- These positions will require some weekend and night work.
- Valid driver's license required with an acceptable driving record and history.

Training and Experience Guidelines:

Any combination of training and/or experience that will enable the applicant to possess the required knowledge, skills and abilities. A general qualification guideline for this position is a Bachelor of Science Degree in Wildlife Management or closely related natural resources or agricultural field and 2-years related field experience. Preference will be given to those with experience in project management, data analysis and annual report writing, a background in animal tracking, predation investigation, the capture/handling/banding of wolves, ArcGIS, the use and deployment of GPS transmitters for monitoring wildlife and fluency in both English and Spanish.

Budget:

- Salary, insurance and benefits
- Travel: Rugged four-wheel drive truck and fuel, lodging and fuel allowance, aerial monitoring as needed, and ATV and trailer.
- Equipment: Nonlethal tools such as FoxLights, Turbofladry, lighting, sound alarms, electric fencing, surveillance cameras, and more; laptop; camping equipment, GPS satellite collar monitoring devices.
- Costs of producing, promoting and distributing training materials: videos, brochures, PowerPoint projector, etc.
- Training: Attendance to professional development trainings and conference to keep up to speed on emerging methods and report on impact evaluation of position.

Questions?

Contact: Suzanne Asha Stone, Senior Northwest Representative, Defenders of Wildlife ssstone@defenders.org or 208-861-4655

Roxann B Borisch

From: Tom Vanasche <tomvanasche@me.com>
Sent: Tuesday, May 14, 2019 9:22 PM
To: odfw.commission@state.or.us
Subject: Oregon Wolf Plan

Dear Commissioners,

It is time to put the wolf management plan into place. The ODFW plan is well thought out and science based. It provides protection for the species, while giving ODFW the management tools to effectively maintain appropriate numbers of all species. The key term here is management by trained biologists backed by science. Don't let EMOTION control the necessity of biological management decisions. Let the scientists apply their knowledge appropriately. That is why they are there.

Sincerely,

Tom Vanasche M.D.

Roxann B Borisch

From: Michael Treat <treatmj68@comcast.net>
Sent: Tuesday, May 14, 2019 10:41 PM
To: odfw.commission@state.or.us
Subject: Support for recent wolf plan draft

Commissioners,

As a hunter in Oregon for the last 42 years, I've enjoyed the pursuit of the big game that our state has to offer. I've also supported the wolf plan process and believe that the science and data supports the wolf plan draft and provides ample safeguards for wolves while providing for the welfare of our big game species. Sound wolf management is important to preserve all of our wildlife. Please support the recent draft of the wolf plan so the tools are in place to maintain healthy wildlife numbers in Oregon.

Mike Treat

Sent from my iPad

Roxann B Borisch

From: Defenders of Wildlife <ecommunications@defenders.org> on behalf of Brett Kessler <defenders@mail.defenders.org>
Sent: Wednesday, May 15, 2019 6:34 AM
To: Members of the Oregon Fish and Wildlife Commission
Subject: Revise the Oregon Wolf Conservation and Management Plan

May 15, 2019

Members of the Oregon Fish and Wildlife Commission

Dear Oregon Fish and Wildlife Commission,

I am writing to you to express my concerns regarding the proposed revisions to the Oregon Wolf Conservation and Management Plan. As an Oregonian who supports the recovery of wolves in Oregon and would like to see them survive and thrive in our state, I am concerned that this Plan does not support my values or that of thousands of Oregonians that share it with me. It does not support further recovery and conservation of this magnificent species, rather it makes it easier to kill them under the minimal conditions of any conflict.

The Plan has provisions that allow for public hunting and trapping of wolves, which is unacceptable. It opens the door for hunting of wolves without calling it. It also has very poor standards for deciding on when the Oregon Department of Fish and Wildlife can authorize the killing of a wolf as a result of conflict with livestock. Two instances of livestock loss in nine months in a state with more than one million cattle, is a very low standard for authorizing killing of a wolf. I urge you to direct ODFW to adopt a standard based on the best available science.

Instead of focusing on how to kill wolves in the name of management, I see more value in investing OFDW's time and resources to prevent such conflicts in the first place, by empowering communities with non-lethal coexistence tools and information. As members of a Commission that directs the agency responsible for the conservation of Oregon's rich wildlife heritage, I request that you take a stand on my behalf for wolves in Oregon. I ask this of you for the present as well as our future generations.

I hope you take my concerns into consideration as you deliberate on the future of wolves in Oregon.

Respectfully,

Mr. Brett Kessler
2257 12th St NW Apt 21
Washington, DC 20009-4481
(919) 903-0491
bkessler@defenders.org

Roxann B Borisch

From: Connie Dunham <mtnaire.connie@gmail.com>
Sent: Wednesday, May 15, 2019 12:57 PM
To: odfw.commission@state.or.us
Subject: Fwd: Revised Wolf Plan

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

From: **Connie Dunham** <mtnaire.connie@gmail.com>
Date: Wed, May 15, 2019 at 12:52 PM
Subject: Revised Wolf Plan
To: <odfw.comments@state.or.us>

Dear Commission members,

Once again, as a ranching family in Eastern Oregon, we are asking the Commission to be as objective as possible in the decisions you make to the current plan. It is obvious that the wolf is recovered and is rapidly expanding its numbers in the state and in adjoining states. This will inevitably lead to more conflicts with livestock as wolves deplete the prey base. Although this is pretty easy to understand, the pro wolf advocates are pressuring for stricter guidelines for wolf removal and management. You have to ask yourselves why! The wolf should not be revered as some magical storybook creature. They by nature are effective killers and must eat meat to survive, and they will add to their prey base to do that. Cattle are easy prey and it doesn't take long for them to figure that out. They can take down perfectly healthy mature bull elk and bison with no problem due to their effective pack maneuvers. They do not rely only on the weak or sick. We have seen wolves single out horses, mules, and elk and full grown cows and take them down.

Unfortunately, with cattle close to human occupation, wolves are also becoming used to seeing humans and as they do, the wolf experts say that they will soon be braver about singling out a person for attack. We saw this twice recently by a hunter who was surrounded and by a woman who was treed by a pack in Washington. She was lucky she found a tree! Once a wolf figures out they are more powerful than you are, your chances of survival get grim. If you don't believe wolves attack people, look at the list of attacks in the USA in the last 100 years in Wikipedia. There are some gruesome examples of people, including armed men, killed and eaten by wolves in the 1800's and several examples of attacks in the last 20 years. This is not frivolous thought. It is only a matter of time before wolves begin attacking people in earnest, and also a short time before you will see wolves on the outskirts of western Oregon towns where they will be scouting for dogs and cats for prey. Think of the families hiking in the woods, camping at lakes, trying to enjoy state and federal parks, and being attacked. We have mushroom hunters, backpackers, campers, hikers here in Wallowa County adding to our tourist dollars, yet a wolf attack could destroy that industry as people fear going in the woods. Not only that, but our ranching families will not be able to leave dogs and children unattended at their homes if they are in wolf territory.

Your citizenry should not have to live in fear. This is a settled state and is NOT the same as it was in the 1800's when many areas were not occupied. Your job is not to protect an apex killer over the lives of your citizens. Your job, as the wolf is being delisted nationwide, is to allow proper and unharassed management. You allowed this animal to multiply in the state and it's now your responsibility to follow sensible paths to manage them. The right way is to allow local ODFW, local law enforcement and Wildlife Services to determine wolves that are not staying away from ranches, people and livestock and remove them without threat of suit by those opposing management. And second, to allow areas that are overgrown with wolves to thin them to save the prey

base. Our great herds of deer are almost gone already and our elk calf survival rate is below 20%, meaning adult elk will not be replaced. As in Yellowstone, our 19,000 head of elk could disappear in 15 years at this rate. I implore you as reasonable people to stand in the face of these wolf people who either don't know the tragic effects that wolves are causing people in eastern Oregon, or don't care. You are the final word and they should accept that.

Sincerely,
Richard and Connie Dunham

541 426-3315 Enterprise, Oregon

Roxann B Borisch

From: Pat <thermochick@eoni.com>
Sent: Wednesday, May 15, 2019 2:33 PM
To: odfw.commission@state.or.us
Subject: Wolf Conservation Plan Comments
Attachments: Union County Cattlemen Wolf comments.docx

The attached comments are submitted on behalf of the Union County Cattlemen regarding the Wolf Conservation Plan Review.

Pat Larson
Union County Cattlemen, Secretary

Union County Cattlemen

61931 Cottonwood Rd.

La Grande, OR 97850

May 10, 2019

ODFW Fish and Wildlife Commission

4034 Fairview Industrial Drive SE

Salem, OR 97302

odfw.commission@state.or.us

Dear Commissioners:

These comments are submitted on behalf of the members of Union County Cattlemen. We appreciate the Department's efforts to edit the Wolf Conservation Plan and we will work toward the species management as the state moves forward. Population control is necessary and better controls will be required as the wolf population continues to increase and move across Oregon.

We favor management zones, which will likely be required in the years ahead when there are too many conflicts between wolves and people. We also concur with the comments submitted by the Oregon Cattlemen's Association.

Sincerely,

Union County Cattlemen

Darren Hansen, President

Pat Larson, Secretary

Roxann B Borisch

From: Tracker <combattracker1969@gmail.com>
Sent: Wednesday, May 15, 2019 2:35 PM
To: odfw.commission@state.or.us
Subject: Wolf Plan

Your wolf plan is a non-plan. There are already too many Oregoons killing wolves. I am an old guy. When I was a child in Wyoming in the 40's and 50's, my relatives hunted wolves to near extinction . They did not know any better. They were ranchers and believed the wolves would not only kill all their cattle and sheep, but thought they would be eating kids. Locally, there was a pair of wolves killed between Selma and Ruch last deer season. Wolves want to avoid people and are extremely smart, but not smart enough to avoid poison and bullets. Stop issuing kill permits now, please. Educate the Oregoons instead. Thank you.

Sent from Mail for Windows 10

5-16-19

To: Oregon Fish and Wildlife Commission
ATT: Chair Michael Finley

This letter is in regards to the Gray Wolf Plan. I would like to encourage you to pass the plan. As a wildlife biologist in Wallowa County for 46 years, I worked with the wolves during their dispersal into northeast Oregon and several of the following years. They have done amazingly well and now occupy all big game units in Wallowa County as well as much of northeast Oregon. Wolves are a highly adaptable species and capable of dispersing hundreds of miles to form packs in historic range.

The 2018 minimum numbers of 137 wolves in 16 packs is incredible. The species needs to be managed by setting population objectives for each unit and allowing hunter/trapper harvest quotas to manage numbers. Oregon has the good fortune of having Idaho and Montana nearby with very successful wolf management programs and we would do well to follow their lead! Thank you for the opportunity to testify.

Vic Coggins
64948 Aspen Grove Rd.
Enterprise, OR 97828
(541) 263-0335

Roxann B Borisch

From: Defenders of Wildlife <ecommunications@defenders.org> on behalf of Terryl Weiss
<defenders@mail.defenders.org>
Sent: Thursday, May 16, 2019 1:25 PM
To: Members of the Oregon Fish and Wildlife Commission
Subject: No more dead wolves! Period!

May 16, 2019

Members of the Oregon Fish and Wildlife Commission

Dear Oregon Fish and Wildlife Commission,

give this poor species a break! What is it about the BIG MEN, who, armed with guns and ammunition set out to destroy a species of animal that is actively needed in their role as predator? Who are these creeps

- and I mean the human ones, as the animals aren't in that category.

Please, act with responsibility towards these animals - and I mean both human and non-human - and keep the human predators under control, while giving the non- human predators a chance!

I am writing to you to express my concerns regarding the proposed revisions to the Oregon Wolf Conservation and Management Plan. As an Oregonian who supports the recovery of wolves in Oregon and would like to see them survive and thrive in our state, I am concerned that this Plan does not support my values or those of thousands of Oregonians who share them with me. It does not support further recovery and conservation of this magnificent species; rather, it makes it easier to kill them under the minimal conditions of any conflict.

The Plan has provisions that allow for public hunting and trapping of wolves, which is unacceptable. It opens the door for hunting wolves without calling it that. It also has very poor standards for deciding on when the Oregon Department of Fish and Wildlife can authorize the killing of a wolf as a result of conflict with livestock. Two instances of livestock loss in nine months in a state with more than one million cattle is a very low standard for authorizing killing of a wolf. I urge you to direct ODFW to adopt a standard based on the best available science.

Instead of focusing on how to kill wolves in the name of management, I see more value in investing OFDW's time and resources to prevent such conflicts in the first place by empowering communities with non-lethal coexistence tools and information. As members of a

Commission that directs the agency responsible for the conservation of Oregon's rich wildlife heritage, I request that you take a stand on my behalf for wolves in Oregon. I ask this of you for the present as well as our future generations.

I hope you take my concerns into consideration as you deliberate on the future of wolves in Oregon.

Respectfully,

Mrs. Terryl Weiss
2160 Applegate St
Philomath, OR 97370-9266
(541) 908-3867
basil2001@comcast.net

5-17-19

Dear Commission members,

As a lifelong outdoor professional (Forest Service 37 years- Timber Pre-Sale, Fuels Manager, Firefighter)/enthusiast, I am writing to say that the state must get a handle on the exploding wolf population. I have spent hundreds of days in the woods and didn't worry about wild animal attacks- until now. I don't go out, unless I'm packin', due to the out- of -control wolf issue, especially in Wallowa County.

I know several ranchers who have to deal with the wolves let alone the red-tape from the state. I also know that there is an "anti-cow on public lands" group out there. Is that where the pressure, on the ODFW, coming from? What about those of us who actually live, work, recreate, and raise families here?

Salem does not run the east side of Oregon- quit treating this side of the state like we don't have a voice- wolves have been forced down our throats, here!

Our main concerns are: 1. that local ODFW, or local law officers or local Wildlife Service personnel determine a confirmed depredation. 2. zones be developed so that when the wolf population gets too high in one area the pack can be thinned to protect game and domestic animals. 3. Wolves continue to be collared in every pack or area.

I am asking the Commission to be as objective as possible in the decisions you make to the current plan. It is obvious that the wolf is recovered and is rapidly expanding its numbers in the state and in adjoining states. This will inevitably lead to more conflicts with livestock and big game depredations as wolves deplete the prey base.

Although this is pretty easy to understand, the pro wolf advocates are pressuring for stricter guidelines for wolf removal and management. You have to ask yourselves **why!**

The wolf should not be revered as some magical storybook creature. They, by nature, are effective killers and must eat meat to survive, and they will add to their prey base to do that. Cattle are easy prey and it doesn't take long for them

to figure that out. They can take down perfectly healthy mature bull elk and bison with no problem due to their effective pack maneuvers

Your citizenry should not have to live in fear. This is a settled state and is NOT the same as it was in the 1800's when many areas were not occupied.

Your job is not to protect an apex killer over the lives of your citizens. Your job, as the wolf is being delisted nationwide, is to allow proper and necessary management. You allowed this animal to multiply in the state and it's now your responsibility to follow sensible paths to manage them.

The right way is to: 1. allow local ODFW, local law enforcement and Wildlife Services to determine which wolves that are not staying away from ranches, people, and livestock and remove them without threat of suit by those opposing necessary management. 2. allow removal, in areas, that are overpopulated with wolves, to save the prey base.

Our great herds of deer are almost gone already and our elk calf survival rate is below 20%, meaning adult elk will not be replaced. As in Yellowstone, our 19,000 head of elk could disappear in 15 years at this rate.

I implore you, as reasonable people, to stand in the face of these "wolf" people who either don't know the tragic effects that wolves are causing people in eastern Oregon, or don't care.

You are the final word and the enviros should accept that.

Sincerely,

Nancy Rencken

Joseph, OR

Roxann B Borisch

From: TomKathy Fisk <ktfisk2@gmail.com>
Sent: Sunday, May 19, 2019 2:48 PM
To: odfw.commission@state.or.us
Subject: Wolf Plan

Hi, my name is Tom Fisk. I've been a citizen and hunter in Oregon for nearly 50 years. While spending time in the backcountry of Idaho I've seen firsthand the affects of too many wolves on the population of elk, mule deer and moose. Here in Oregon it is unfortunate that just as we are starting to establish a viable moose population in Northeast Oregon Wolves are gaining a stronghold.

It is imperative, a minimum, that the Wlidlfe Commission follow the most recent version of the Wolf Plan allowing hunting and trapping to maintain wolf numbers at management objective numbers.

If wolf numbers are allowed to continue increase unchecked - I believe they will devastate big game wildlife in Oregon. Thank you for your service and dedication to the citizens and wildlife of the Great State of Oregon.

Tom Fisk
Resident of Baker City, Oregon

Sent from Mail for Windows 10

Roxann B Borisch

From: Stacey Fregulia <sfregulia@co.wallowa.or.us>
Sent: Monday, May 20, 2019 11:11 AM
To: Todd Nash; Susan Roberts; odfw.commission@state.or.us
Subject: Phase Three Changes.pdf
Attachments: Phase Three Changes.pdf

Categories: Forwarded to Wildlife

To Whom it May Concern:

Please find the enclosed letter approved and adopted by the Wallowa County Board of Commissioners in response to the Phase Three Changes they deem necessary in the Oregon Wolf Management and Conservation Plan.

Thank you,

Stacey Fregulia
Wallowa County
Executive Assistant/Administrative Assistant
101 S. River St., RM. 301
Enterprise, OR 97828
Direct Line (541)426-7730
Fax (541)426-0582



State of Oregon
WALLOWA COUNTY
BOARD of COMMISSIONERS
101 S. River Street #301
Enterprise, Oregon 97828

541-426-4543 ext#1130

Fax: 541-426-0582

Email: commissioners@co.wallowa.or.us

CHAIRMAN, SUSAN ROBERTS

COMMISSIONER, TODD NASH

COMMISSIONER, JOHN HILLOCK

May 20, 2019

Chair Finley, Director Melcher, Members of the Commission;

Wallowa County has the highest concentration of wolves in the State of Oregon. The first established packs/breeding pairs were also in Wallowa County. We have had more experience with wolf/livestock conflict and depredations than another county in Oregon. The first compensation committee in the state was setup here as well.

Ten years of conflict with wolves, ten years of growing pains have proven to be challenging for many in our area starting with livestock producers, law enforcement, wildlife services, ODFW biologist, and the environmental community. Decisions are often based on politics of the day rather than evidence and practical application of the Oregon Wolf Plan.

These are the phase III changes we see necessary in the Oregon wolf Management and Conservation Plan:

1. Normalize wolves as another predator on the landscape.

- Depredation calls made in the field by qualified investigators.
- This could include, sheriffs, state police, ODFW biologist, wildlife services, or contractor.

2. Continue collaring.

- Collars are important part of non-lethal deterrents.
- B. Every wolf in Oregon will come into contact with domestic livestock, and a notification system that allows producers to know where wolves are is the most powerful deterrent we have.

3. Management areas.

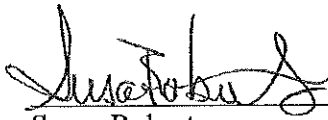
- Establish management areas so that no one place in Oregon becomes overpopulated, and becomes overly burdensome to both wild and domestic ungulates.

4. Notify County government boards, and sheriffs.

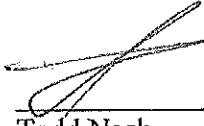
- The current draft of the Plan uses language "as needed". This is an absolute need as the compensation committee has a county commissioner on it. 911 is used as an after hour way to report wolf depredations. The sheriff is often time the first point of contact in setting up investigations.

These are the changes we in Wallowa County need to make an already challenging situation a little more tolerable.

Thanks for your consideration.



Susan Roberts
Chairman



Todd Nash
Commissioner

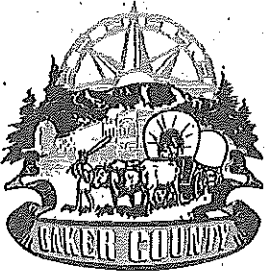


John Hillock
Commissioner

Roxann B Borisch

From: dbruland@bakercounty.org
Sent: Monday, May 20, 2019 2:27 PM
To: odfw.commission@state.or.us
Subject: OR Wolf Mgt Plan Comment from Baker County
Attachments: OR Wolf Mgt Coment.pdf

Categories: Forwarded to Wildlife



Oregon Fish and Wildlife Commission
Sent to: odfw.commission@state.or.us

Testimony on the Oregon Wolf Conservation and Management Plan

May 20, 2019

Bill Harvey
Commission Chair
bharvey@bakercounty.org

Dear Commissioners,

Baker County supports the Oregon Wolf Conservation and Management Plan in general and is offering suggestions for inclusion into the final Plan. In eastern Oregon, as well as around the State, problems are emerging and conflicts between wolves and people, primarily livestock producers, have begun to escalate. This makes it even more critical to have a Management Plan in place to provide clear guidance and faster responses to wolf activity.

The County agrees that the establishment of packs should not be through reintroduction, but through natural dispersal within the State and from adjacent states. However, distribution needs to be limited to public lands within specific Wolf Management Zones. Adaptive management should be used to keep wolves off of private property. In addition, Wolf Management Zones must have population caps.

Coordination with local governments should occur not only with the discussion about relocation, but more importantly, for lethal takes. The State must recognize that the local officials have the authority to act for the safety, health, welfare, and economic viability of its citizens and therefore interaction between wolves and livestock (or people) needs to be decided locally.

The monitoring of wolf populations needs to be an all-hands-on-deck approach and must be robust, defensible, and rely on scientific methodology. Radio-telemetry, while minimal at this time, needs to increase to at least the collaring a minimum of two wolves in every pack. This will allow for better tracking of pack movements and livestock owners to be notified in a timelier, and accurate, fashion. In addition, ODFW biologists need to acknowledge that citizens are able to collect data and report sightings and have those reports be believed.

The County agrees that non-lethal strategies to address wolf-livestock conflicts should always be attempted by livestock producers. However, due to topographical constraints, financial impacts both of livestock loss and the cost of non-lethal methods, and the increasing opportunities of wolves to become acclimated to human and livestock presence, more emphasis needs to be on lethal control measures. Currently, four attacks in six months is supported in the Draft

Plan, however, the loss of that number of livestock is a huge financial burden on livestock producers. The Plan should tighten up the attack criteria to be two attacks within a four-month period, leaving out the criteria that those attacks must be by the same wolf or wolves.

Baker County understands that wolf management is a contentious issue. However, allowing outside groups to have the same input into management as those that are financially and physically impacted, should not be allowed. It's our citizen's lives and livelihoods that are on the line every day when dealing with wolf issues, a person living in an urban setting that will never see a wolf outside a zoo, should never have a seat at the table for management purposes.

Thank you for the opportunity to provide input into the planning process. We encourage you to coordinate with the County in the future as the Plan is finalized and implemented.

Sincerely,

A handwritten signature in dark ink, appearing to read "Bill Harvey", with a long horizontal line extending to the right.

Bill Harvey, Chair
Baker County Commission

Roxann B Borisch

From: ORTWS Main <ortws@ortws.org>
Sent: Tuesday, May 21, 2019 10:58 AM
To: ODFW Commission
Subject: ORTWS Comment Letter for ODFW Wolf Plan
Attachments: ORTWS Wolf Plan Comments 5_21_2019.pdf

Categories: Forwarded to Wildlife

Dear Commission,

Please see attached the Oregon Chapter of The Wildlife Society's comments on the Oregon Wolf Plan.

Feel free to contact us with any questions.

Sincerely,
The ORTWS Board



**OREGON CHAPTER
OF THE WILDLIFE SOCIETY**
PO Box 2378
Corvallis, OR 97339

DATE: MAY 21, 2019

FROM: Oregon Chapter of the Wildlife Society

SUBJECT: Draft Oregon Wolf Management Plan – 2019

TO: Oregon Fish & Wildlife Commission

The Oregon Chapter of the Wildlife Society (ORTWS) has conducted a thorough review of the draft 2019 update of the Oregon Wolf Conservation and Management Plan dated 4/12/19 (hereafter, draft Plan), and this letter is to express our strong support for the draft Plan and its adoption by the Commission. Our comments are directed to those areas of the draft Plan which we believe are key to successful implementation of the Plan and overall conservation and management of gray wolves in Oregon.

The Wildlife Society is an international organization founded in 1937, representing nearly 10,000 professions, including scientists, managers, educators, technicians, planners, consultants, conservation officers, students, and others who manage, conserve, and study wildlife populations and habitat. In Oregon, the Oregon Chapter of The Wildlife Society represents nearly 500 such professionals from many areas of public and private enterprise.

As predicted in the original (2005) Oregon Wolf Conservation and Management Plan, and under the primary management of ODFW, the Oregon wolf population has continued to grow. The draft Plan is considered an update of the original Plan and maintains a similar overall approach and adherence to the original Plan's guiding principles. In addition, the original Plan was crafted using an adaptive management approach. ORTWS supports this approach and the continued importance of maintaining, to the extent possible, general agreements and understandings made in the original Plan while incorporating new information, science, and lessons learned since wolves became established.

We are aware of the extreme public scrutiny and revision of earlier drafts of this Plan over the past four years, and fully understand the polarizing nature of wolf management. However, we are concerned the long time-frame of the Plan update process (approximately four years) could set an unfavorable precedent; consuming disproportionate levels of agency resources to the detriment of more imperiled species and priorities. Thus, we strongly encourage future updates of wildlife management plans occur in a more timely and efficient manner.

As part of our overall support, we urge the Commission consider the following comments on specific components of the draft Plan.

ORTWS written comments on the Oregon Wolf Conservation and Management plan, 2019

1. ORTWS appreciates and supports the draft Plan's comprehensive update and use of new scientific information as a basis of sound wolf management policy. Compared to the original Plan (2005) the breadth of scientific literature included in this draft Plan is impressive. We also note the draft Plan's inclusion and discussion of several new scientific papers throughout the draft, many with competing conclusions, representing a healthy consideration and debate of a larger body of work completed on the species. While science does not answer all questions and issues regarding wolf management, it remains the key foundation for sound management policy decisions. While there has been much debate over the past several years over the use of science in Oregon wolf management, ORTWS appreciates the addition of, and overall quality and diversity of new scientific research contained in this draft Plan.
2. Regarding the issue of livestock depredation, ORTWS strongly supports the draft Plan's specific and continuing reliance (Chapter 4, page 52-53) on objectively conducted and evidence-based investigations of wolf depredation, regardless of which agency conducts the investigation. ODFW has been a national leader in this regard for many years, and continuing this expectation, even in Phase 3 of the Plan, is important as wolves continue to expand into new areas of the state.
3. Continued and effective monitoring and data collection of wolves is integral to the successful implementation of this draft Plan, and ORTWS supports the phase-specific wolf monitoring protocol outlined (page 28-29) in the draft. Because of the secretive nature of wolves, and the importance of accurate population data, continued but strategic use of radio and GPS monitoring of individual wolves will continue to be important. The capture of wolves involves specialized and often expensive methods, and carries a certain level of risk to both wolves and wolf managers, and the draft appropriately identifies that not all packs will be expected to have radio-monitored wolves.
4. ORTWS supports the draft Plan's handling of the issue of targeted take of wolves in Chapter 3, and in regard to depredation of livestock (Chapter 4), and wolf-ungulate interactions (Chapter 5). In particular, we strongly support the clarification of backstop language that assures that any take under these chapters in Phase 3; a) will not impair overall viability of the species, and b) will not be retaliatory, but rather only considered if the take is expected to solve the management situation. Further, ORTWS does not interpret this draft plan as a segue to broader scale hunting during the next five-year review period, in part because the draft Plan correctly relies on the 2015 delisting analysis regarding wolf population viability and health. We also continue to support the concepts of no general season hunting of wolves, and the listed prerequisites (and Commission action) on pages 31-32 required before any controlled take could occur.
5. Overall, ORTWS agrees with the draft Plan's updated method and procedures (Chapter 4) to determine the critical time for removal of wolves causing livestock depredation. We are somewhat concerned of the proposed definition of chronic depredation as two livestock depredations in a nine-month period, primarily because the number "two" simply does not comport with any definition of the term chronic that we are aware. However, we do understand and support the facilitated public process that was used by ODFW to arrive at this definition of chronic livestock depredation. In addition, ORTWS understands that ODFW must also balance this definition with other policies and mandates for effectively addressing wildlife-caused damage.

6. ORTWS supports the inclusion, content, and use of the Potential Conservation Threats section of the (pages 19-27), as a basis of general caution when managing wolves under this Plan. In particular, and upon adoption of this draft Plan, ORTWS strongly recommends that ODFW initiate a comprehensive Oregon-specific survey of public attitudes and perceptions of wolves and wolf management by utilizing accredited Universities or other scientific researchers. This is briefly discussed on page 25 of the draft Plan and will become increasingly important as the Oregon wolf population continues to increase.

The mission of ORTWS is to promote wise conservation and management of wildlife resources in Oregon by serving and representing natural resource professionals. A central purpose of ORTWS is to aid public natural resource management decisions in Oregon by communicating best available science, and supporting scientifically sound management policies. This draft Plan contains a necessary union of available scientific information and management experience. ORTWS endorses this draft Plan and its conclusions and recommendations, and encourages the Commission to adopt the updated plan and the associated rule(s) provided to you by ODFW Wildlife Division.

Respectfully,

ORTWS Board of Directors

Roxann B Borisch

From: Wally Sykes <captmayo@eoni.com>
Sent: Tuesday, May 21, 2019 1:05 PM
To: ODFW Commission
Subject: Wolf Plan Review

Dear Chair Finley and Commission Members:

I'm voicing my objections to policies in the Draft Wolf Plan that allow implementation of state-sanctioned wolf killing after only two confirmed predations on livestock in a 9-month period. In cases on public land, especially where unsupervised livestock are placed in proximity to wolf packs and den and rendezvous sites, it is not unlikely that wolves will take this many, and this should be part of the producer's cost of business when using heavily subsidized public grazing allotments. Before killing wolves, producers should be required under these circumstances to use all available nonlethal techniques, not limited to but including changes to breeds of cattle better able to defend themselves (horned, agile breeds) and providing more human presence. These are not onerous considering the absurdly low cost of public grazing.

Especially objectionable in the Draft Plan are allowances for "controlled take" of wolves by "deputized citizens" and mention of future "controlled hunts." Scientific studies have repeatedly shown that indiscriminate killing can make wolf/livestock conflict greater, and selecting "privileged" hunters to fulfill a role belonging to ODFW's experts is contrary to the public duty of the ODFW. It will encourage the picture of wolves as a trophy animal. It will reinforce the ODFW concept of wolves as human prey, a concept rejected by over 70% of Oregonians.

Ten years after wolves re-colonized Oregon the confirmed population is only 137. By any standard but ODFW's, this is a paltry increase and wolves deserve far greater protection than is offered in the Draft Plan.

Please reconsider this Plan and make it one that actually will allow wolves to reclaim their rightful place in our state. Please include in your deliberations the increasingly sophisticated scientific understanding of wolf behavior, wolf importance to ecological health and the effects poaching and habitat loss/degradation on ungulate populations (rather than ascribed wolf predation).

Thank you,

Wally Sykes
Joseph, OR

May 22, 2019

Michael Finley
Chair of the Oregon Fish and Wildlife Commission
Oregon Department of Fish and Wildlife

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

Dear Chairman Finley and Commissioners,

I am writing to ask that you prioritize wolf protection, recovery, and nonlethal methods for managing interspecies conflict in the Oregon Wolf Plan. As an Oregon resident for 31 years, I support strong protections for wolves, and I am concerned that the current plan does not protect wolf populations adequately.

As you are well aware, the current population count places wolf numbers at only 137. While this is an increase from previous years, wolf populations are still vulnerable, and a loss of strong protections could seriously affect their continued recovery. Sanctioned killing of wolves, as described in the Plan, undermines pack structure, threatens the health and wellbeing of the overall wolf population, and reinforces negative public perceptions of wolves.

Wolves play an important role in the ecosystem and should not be killed to benefit private interests that do not represent the majority of Oregonians. Nonlethal management, such as the Wood River Project in Idaho, has shown that wolves and livestock can coexist successfully. Furthermore, wolves play an important role in the restoration of plants and trees to an area and control populations of animals, such as deer, that can damage trees and plants. These positive environmental effects were shown in Yellowstone when wolves were reintroduced. Healthier, more abundant plant life leads to an increase in songbirds, raptors, rabbits, beavers, and fish, and in general enhances biodiversity and may combat the negative effects of climate change. More tree cover would likely decrease the risk of wildfires, as a healthier forest and ground cover would have less dry and dead growth. Given that the United Nations issued a report this year showing the unprecedented rate of species decline and extinction worldwide, it is now more urgent than ever to protect our environment by all possible means.

I love Oregon because of its beautiful landscapes and forests, abundant natural resources, and biodiversity, and wolves are a necessary part of that. I urge you to make conservation and protection, rather than killing, a foremost priority in the Oregon Wolf Plan.

Thank you for your time and attention.

Sincerely,

Angela Hofmaster
Medford, Oregon

Roxann B Borisch

From: lcampbell@peak.org
Sent: Wednesday, May 22, 2019 9:10 AM
To: odfw commission
Subject: Reject the Draft Wolf Management Plan

Dear Commissioners:

Please reject ODFW's Draft Wolf Management Plan.

It caves completely to livestock industry interests & does not require landowners to implement non-lethal deterrents before wolves are executed. Throwing half-grown guard dogs outside is not an adequate deterrent. I believe Ted Birdseye should be charged with animal abuse for doing this & letting wolves kill his pup.

- Fencing on private property, 24-7 range riding, fladry, NO bone piles, ever. These measures should all be REQUIRED.
- If livestock are using public land, NO taxpayer money should be used to either assess a kill or execute wolves for preying on livestock, nor should landowners be compensated. If a cow breaks a leg on rough ground & dies, does the landowner expect compensation from the state? Of course not! All risks are assumed by the landowner & public land is rightfully wolf habitat.
- Please - NO HUNTING of wolves, under any category or circumstance. "Controlled take," "deputized private citizen," all open the door to Oregon becoming a wolf trophy hunting state down the road. This is NOT what Oregon is - or should - be about.
- Finally - wolves' natural prey species are ungulates. ODFW should never be allowed to limit deer & elk kills by eliminating wolves from any area.

Thank you.

Sincerely,
~Linda Campbell
PO Box 334
Philomath, OR 97370
lcampbell@peak.org

Roxann B Borisch

From: Scott Fernandez <scottfernandez.pdx@gmail.com>
Sent: Tuesday, May 21, 2019 9:53 PM
To: odfw.commission@state.or.us; Scott Fernandez
Subject: Comments from Oregon citizen - Supporting wolves retaining US Endangered Species Act for the whole state of Oregon.

May 20, 2019

To Oregon Department Fish and Wildlife,

We write today to discuss the necessity to retain the entirety of Endangered Species Act for Oregon gray wolves. Hunting, trapping and habitat loss drove gray wolves to near extinction in the twentieth century. Conservation efforts made possible by the Endangered Species Act as allowed them to come back and begin to re-establish their former habitats. But, the Trump Administration is in the process of preparing a rule that would strip every gray wolf in the lower 48 states of crucial Endangered Species Act protections.

Wolves have only begun to recover in many parts of the country- and they are completely absent in others. The successful recovery of gray wolves in the Northern Rockies was only possible because of strong protections of the Endangered Species Act. The Trump Administration plan would jeopardize any future recovery by allowing states to manage gray wolves as a game species. This would be a death sentence for many wolves. Wolves currently protected under the Endangered Species Act would likely face aggressive hunting and trapping immediately. Wolves in the United States were subject to brutal and reckless attempts to drive them from the landscape in the last century. When they were protected under the Endangered Species Act in 1974, they were gone in all but one state in the continental US. The protections of the Endangered Species Act have allowed gray wolves to recover in some parts of the country.

I'm concerned to learn that the Trump Administration is planning a rule that would remove these vital protections, as Oregon may do against majority of our citizens,

from still-recovering gray wolves in the lower 48 states. Without these protections, states will have no limits on the management of these iconic and maligned wolf species.

In Wyoming, where wolves once had the Endangered Species Act protections, they are treated like nuisance animals and can be killed without limit at any time of the year. In Wisconsin, the state has reportedly made plans to eradicate more than fifty percent of the wolves in its borders if Endangered Species Act protections were lifted. In Washington State, shooting wolves from helicopters in the air frequently takes place. The Oregon citizens' majority do not want any of this. These same stories of killing instead of conservation could play out across the United States where wolves are trying desperately to re-establish their rightful habitats.

Please, strongly reconsider this unscientific plan and instead develop a wolf recovery plan to bring these majestic animals back in their entirety. As an example, wolves introduced into Yellowstone Park years ago changed and restored the ecosystems to a stronger and vibrant habitat for ALL animals to live. The wolf Endangered Species Act is the answer. **The Majority of Oregon Citizens Request All Wolves Retain Endangered Species Act Protections.**

Thank you,

Scott Fernandez

Portland, Oregon

Roxann B Borisch

From: Riley Savage <riley@archerypast.com>
Sent: Tuesday, May 21, 2019 4:11 PM
To: odfw.commission@state.or.us
Subject: Wolf Plan Letter
Attachments: Wolf Plan Letter to the Commission.docx

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Forwarded to Wildlife

Hello Commissioners,

Attached is a letter from the Traditional Archers of Oregon in favor of the most recent wolf plan.

Thank you,

Riley Savage
President
Traditional Archers of Oregon

May 21, 2019

Chair Finley, Director Melcher, Members of the Commission;

I am a livestock producer in Southwest Oregon. I realize that wolves don't fall under the Oregon Wolf Plan in this area yet. However they probably will in the next few years. If the wolf population continues to grow at 10% per year as in the past Oregon will have over 500 wolves in 10 years. I would like to remind the Commission that livestock producers have never wanted wolves in Oregon. The cost to our family businesses in terms of harassment, weight loss of animals, reproductive failure, and death loss is too expensive. Since we do have wolves and have to manage them, the Plan must have protections for livestock so we can stay in business.

These are some of the changes necessary in the Oregon Wolf Plan.

Depredation determination should be made in the field by qualified investigators, Sheriffs, State police, Wildlife Services or ODFW biologists.

Every pack must have at least one wolf with a tracking collar. This is especially important in the Cascade Mountains and Coast Range. This densely tree and brush covered area is going to be difficult to count wolves or remove wolves that repeatedly kill livestock. A notification system that allows producers to know when wolves are in their area will help them to prepare nonlethal systems.

The current plan allows ODFW to give permits to ranchers for lethal take in certain circumstances. While I agree this is helpful, the ODFW is responsible for wolf management and should be ultimately responsible for removing problem wolves.

Thank you for your consideration,

Veril Nelson

Roxann B Borisch

From: Deer Trapper <deer_trapper@hotmail.com>
Sent: Wednesday, May 22, 2019 12:58 PM
To: odfw.commission@state.or.us
Subject: wolves

I have sent you messages before on wolves and the need to manage them. The area biologists need to start being honest with you and the public. The bologna that there are only 135 wolves in Oregon is a known lie. The truth, they have no idea how many wolves are in our state. They are not monitored. When citizens make a report they scoff and file in file 13. The game commission should be given every citizen report. I worked at a gun store in Roseburg for 3 years and heard several reports of wolf sightings from reliable friends and customers just from the Umpqua National Forest. Then to hear that wolves killed sheep on the south coast, and reports from the north cascades. Our state is populated with wolves. When wolves aren't eating livestock they are eating deer and elk. They kill any animal not the fabled weak or young.

25 years ago 35 wolves were released into Yellowstone park. At that time there were 19,000 elk, an overpopulation due to the feeding and not managing a game animal. Today there are 4,000 elk in Yellowstone. That is just the elk numbers, deer and buffalo are also victims to wolves. The hunting tags for areas outside the park in Wyoming, Idaho and Montana have been eliminated. Wyoming stood up to the Federal Government. They said they were not going to let wolves ruin their state. Outside of the park 100 wolves are protected in a perimeter area. Beyond that wolves are the same as coyotes, shoot on sight no tag.

A few years ago we were told we were starting to see Moose in Oregon. They were coming from Idaho, the same route as the wolves. Now ODFW is wondering where the Moose went, Dah!!!

The famed OR-7 has a pack that has been following the deer heard from Crater lake in the summer to California in the winter for years now. Ask Mark Vargus, the biologist, at Central Point what he is seeing. The game commission is going to have to stand up to the animal rights people and our liberal gun hating Oregon government or we will see a continued loss of hunting opportunity and hunters in our great state. Oregon is not a wilderness like Canada and Alaska where there are 10's of thousands of wolves. Wolves are not going extinct. If we are going to have to live with them they have to be managed.

I have been a hunter for 40 years and worked at ODFW for 13 years, an OHA member for a long time.

A few weeks ago volunteering with Search and Rescue in the Toketee area with my search dog, we were warned there is a pack of up to 12 wolves in the area. Toketee's Thorn Prairie is elk winter ground.

ODFW Oregon Department Fish and Wildlife, or Oregon Department of Fish and Wolves.

Jeff Orr 10722 Hubbard Creek Oregon, Umpqua, Oregon 947486 541-459-3513

|

Roxann B Borisch

From: Verena Fabian <vfverenafabian@gmail.com>
Sent: Wednesday, May 22, 2019 2:23 PM
To: odfw.commission@state.or.us
Cc: Verena Fabian
Subject: Wolf conservation and Management Plan meeting

To: ODFW Commission

I would like my comments to be included at the wolf management plan meeting (June 7, 2019). I am a retired microbiologist with interest in apex predator species and micro organisms' impact on ecosystems when certain populations reach decline or become extinct. On a non microscopic level, this interest has led me to follow the Yellowstone National Park wolf introduction program from its onset, especially recent assessment and conclusion of the government's controversial and labor intensive effort to make the wolf introduction succeed. And, after decades of study, succeed it did.

The reintroduction of a key predator, the wolf, caused the elk population to be constantly vigilant and on the move, causing the elk herds to move away from continuous browsing at the riparian zones, thus allowing river and creek vegetation to once again flourish after decades of over browsing by ungulates. The return of vigorous riparian forbs, shrubs, and trees enabled the now absent beaver, amphibians, reptiles, and wetland birds to return to this damaged ecosystem. Extensive riparian erosion also reversed due to slower moving water. The wolf population preyed upon the overpopulated ungulates, kept the herds on the move, allowing riparian habitat to recover. Wolves and coyotes also do not amicably share habitat; the wolf wins. Balance was restored, however, at great monetary cost.

Government reintroduction programs of key apex predators are costly, to say the least. They involve tremendous human effort on behalf of many highly trained and dedicated professionals. Why, then, would this tremendous effort and cost be compromised via a licensed open hunting season on the very animal it cost tax payers huge sums to reintroduce in the first place? This seems counter intuitive. Or even allow the killing of so-called problem wolves by private individuals and not solely by government wildlife personnel? Poaching will always occur, regardless. Why further give it a green light via a license to kill wolves? How many wolves is too many? Why open this subject up to even more controversy? I live in a rural area. Both poaching and legal hunting are popular. There is not the personnel to enforce the illegal killing of wildlife nor oversee legal licensing. That is the reality. Predators killing livestock is also a reality. However, do not place the killing in private hands, no matter how strict the rules allowing it. If the wolf continues to advance into more populated human areas, there will certainly be conflict. That future conflict can be further assessed of who is allowed to kill a wolf when the wolf population exceeds more than just three. Kindly excuse the sarcasm. It seems the panic level arises at one.

In Minnesota, generations of ranchers have lived with wolves sans hysterical alarm. They do so by involving guard dogs that have been raised and live with ranchers' livestock. They do so by surveillance of rangeland via horseback and, where possible, truck. They do so by constantly moving livestock around grazing areas so the wolves do not associate a specific area with easy kill. When all else fails and prey has been identified as a wolf kill by government biologists, the rancher is compensated for all lose(s) and the, hopefully, culprit wolf is identified and if a repeat killer, also killed. According to documented Minnesota ranchers' testimony, this happens rarely. These ranching practices are also in use in Oregon, and responsible ranchers use them. Only when wolf predation is continuous and all other practices have proven to have failed is a wolf killed.

Aside from correcting the elimination of species from a former habitat, the purpose of apex predator reintroduction and protection is to reestablish ecosystem balance; a hefty and possibly questionable undertaking considering the on going and heavily damaged environs in which we now live (this imbalance interference also

applies on a microbiological level—elimination of healthy human gut flora and otherwise benign bacteria via indiscriminate antibiotic use).

Let us at least keep the more stringent regulations regarding wolf management rather than loosening the reigns favoring subjective free will.

Respectfully yours,
Verena Fabian

Roxann B Borisch

From: Kaethe Mentrum <CelaandGany@hotmail.com>
Sent: Wednesday, May 22, 2019 6:20 PM
To: odfw.commission@state.or.us
Subject: Wolf Management

Kindly continue the protection of wolves in Oregon.

As you may know, wolves play a big role in the ecosystem. Upon researching deer and elk population in Oregon, we came up with some data showing wolf minimum of 137 versus elk/deer population of approximately 363,694 in Oregon alone. If this figure is correct, the deer/elk, in the harsh winter will kill the trees by eating their barks. The trees by the river banks will no longer be existing to provide shade, thus warming the water. Our fish and other creatures will suffer. Deer and elk hunters alone will not be able to kill off so much population. We need the wolves here in Oregon. Oregon's gray wolves must be protected. Thank you.

Kaethe Mentrum

From: Kebrhea Cuellar <kebrhea@hotmail.com>

Sent: Wednesday, May 22, 2019 10:38 PM

To: odfw.commission@state.or.us

Subject: Wolf Plan Comment

Like many Oregonians I am concerned and confused by the ODFW commission's draft wolf plan released April 15th. It seems that the overwhelming body of research that is widely accessible regarding wolves and depredations, non-lethal controls, behavior and biology, has not been taken into account

The large body of available research shows that non-lethal measurements are effective at preventing livestock depredations, while lethal control is not only ineffective, but actually leads to further depredations due to its destabilizing nature on pack structure.

The draft plan has no requirements for non-lethal measures before killing wolves. Livestock producers, many of which enjoy grazing their livestock on public land, do not have to do anything to protect their animals, and the state (and taxpayers) foot the bill.

Especially confusing is why this was left out of the draft plan when it's an approach that both the conservation community and livestock producers support.

I am concerned by the draft plan's new definition of livestock "depredation", which lowers the threshold to two losses within a nine month period without taking into account whether the producer has taken any measures to protect their animals such as; removing bone piles, removing animals from known wolf areas, utilizing fladry or using guard dogs. These are some of the most basic and cost-effective, but often ignored, measures.

I am concerned about the language regarding deputizing citizens to carry out lethal removal or "controlled take". Over 72% of Oregonians are against hunting wolves and that is, in essence, what is being proposed. The draft plan mentions controlled take as a possibility in the future. I am concerned by the mention. At last count there were only 136 wolves in the state, very few of those west of the Cascades. That is not a viable population.

I am concerned about the suggestion of allowing Wildlife Services- an institution that has been so heavily scrutinized for their ineffective and archaic practices that have no scientific or statistical basis which even our Governor has proposed to remove funding- to carry out depredation investigations.

I am concerned about this plan, given that livestock losses due to weather, birthing complications, and other predators is significantly greater than that due to wolves, a very small population of Oregon's wildlife, yet this plan will only lead to the killing of more wolves.

I am concerned that this draft plan has not taken into consideration the will and wishes of the majority of Oregonians, the body of wolf research that has been rapidly growing and evolving over the last few decades or any of the statistics on depredations, lethal and non-lethal measurements.

I am concerned that it does nothing to empower Oregon's livestock producers or help evolve their practices for coexistence or the future sustainability of the industry.

I am concerned that this plan has no relation or to ODFW's mission to "protect and enhance Oregon's fish and wildlife and their habitats for use and enjoyment by present and future generations".

I am asking the commission to go back to the drawing board on this plan and please take an approach that considers science and upholds ODFW's mission.

Thank you for hearing my concerns,

/s/ Kebrhea Cuellar

KEBRHEA CUELLAR

Roxann B Borisch

From: kathryn thompson <kathrynht@yahoo.com>
Sent: Thursday, May 23, 2019 8:45 AM
To: odfw.commission@state.or.us
Subject: Planning meeting on June 7th

To: Oregon Dept. of Fish and Wildlife

I hope the commission will bear in mind that many citizens of Oregon want to have the presence of wolves in Oregon's forests and other public lands.

The interests of ranchers can be considered without removing wolves from public lands in Oregon and while still respecting the rights of citizens who want to see their state maintain ecologically balanced, true wilderness. Tourism alone would make preserving it a financially wise decision.

With so few wolves in Oregon, especially in Western Oregon, it is unthinkable to consider legalizing hunting wolves. I sincerely hope that the commission will rule out any so-called "sport" hunting of this natural resource.

Oregon has the opportunity to maintain the natural resources and wild beauty that other states have lost, including its wide diversity of wildlife. It is because of its wild beauty and wide diversity of wildlife that, despite having lived in many other states, Oregon is the only state for which I have felt "homesick".

Kathryn Thompson
Central Point, Oregon

Roxann B Borisch

From: Michelle Tate
Sent: Wednesday, May 22, 2019 5:04 PM
To: Douglas Cottam; Kevin Blakely; Derek J Broman; Curt Melcher
Cc: Roxann B Borisch
Subject: FW: Draft Wolf Plan Comments Cascadia Wildlands
Attachments: Draft Wolf Plan Cascadia ODFW Commission 5.22.pdf

From: Nick Cady <nick@cascwild.org>
Sent: Wednesday, May 22, 2019 3:49 PM
To: odfw.commission@state.or.us
Subject: Draft Wolf Plan Comments Cascadia Wildlands

Please find attached comments and proposed changes to the Draft Wolf Plan from Cascadia Wildlands. Please feel free to contact me with any questions or clarifications. Thank you for this opportunity to submit feedback.

Nick Cady
Legal Director
Cascadia Wildlands - we like it wild.
CascWild.org
PO Box 10455 Eugene, OR 97440 - [541.434.1463](tel:541.434.1463)

Cascadia Wildlands defends and restores Cascadia's wild ecosystems in the forests, in the courts, and in the streets. We envision vast old-growth forests, rivers full of salmon, wolves howling in the backcountry, and vibrant communities sustained by the unique landscapes of the Cascadia bioregion. [Join our movement today.](#)



May 22, 2019

RE: Cascadia Wildlands testimony on the Draft Wolf Plan

Chair Finley and Commissioners,

For the record my name is Nick Cady. I am the legal director for Cascadia Wildlands. I live in Eugene, where our principal office is located. Cascadia Wildlands is a regional non-profit conservation organization representing 10,000 members and supporters. Cascadia Wildlands educates, agitates, and inspires a movement to protect and restore Cascadia's wild ecosystems. We envision vast old-growth forests, rivers full of wild salmon, wolves howling in the backcountry, and vibrant communities sustained by the unique landscapes of the Cascadia bioregion. Changes to Oregon's wolf plan are extremely important to Cascadia Wildlands and our members. We wish to see the following changes made to the Draft Plan:

Chronic Depredation

Chronic depredation is one of the most important concepts in the draft wolf plan, and killing wolves in response to chronic depredation has accounted for the vast majority of human-caused wolf-mortalities in our state. In 2017, the Department balanced the interests of the livestock producers and conservation groups and additionally looked at every on-the-ground depredation situation that had occurred since wolves had returned to the state. The Department concluded that killing wolves after 3 depredations in a 12-month period was a fair and strategic balance.

The problem with this proposal, as we pointed out to the Commission and the Department at the time it was proposed, was that, if implemented, it would have resulted in the loss of approximately 25% of Oregon's wolf population in 2016. Applying this standard across other years results in similar levels of wolf mortality, levels of mortality which far exceed the Department's modeled levels of human-caused wolf mortality that will result in wolf extinction in Oregon.

This numbers become far less dire for Oregon's wolves, if the 3 depredations are limited to a single grazing season (i.e. 6-9 months). Thus, we recommend changing this standard in Phase II and III to 3 depredations within a 9-month period.

We recommend amending the plan as follows:

Page 50 Line 31: Replacing "two" with "three"

Page 51 Line 34: Replacing "two" with "three"

We want to reiterate that this is a deeply compromised position for our organization. We believe that killing wolves after three depredations is inappropriate because the state's wolf

compensation program can afford to compensate much higher levels of loss before we move to start killing wolves. However, we offer this position as a compromise to the interests of the livestock community. We believe it represents a fair middle ground based upon the years of negotiation leading up to this plan revision, and the OCA's previous sign-off on a depredation of chronic depredation that was 4 depredations with a 6 month period.

Controlled Take

The Draft Wolf Plan developed by the Department contemplates "Controlled Take," which would constitute "responsive hunting and trapping when required for management purposes, although these management tools would not be applied in the same manner as under a traditional game mammal or furbearer classification." But the Department also contemplates in the Draft Plan that the Commission may authorize general season hunts as well.

Hunting of wolves goes against the wishes of the majority of Oregonians, the people that this Commission serves. Also, public killing of wolves would hinder if not undue recovery given the overall low numbers of wolves in the state coupled with fragile dispersal situations further west and south.

The Department is considering here is the use of "public/private hunters and trappers...to assist with ODFW management response actions." Draft Plan at 31. As an initial point, our organizations oppose the use of public hunters/trappers in this manner because of the risks associated. Repeatedly, we have seen agency personnel, life-long professionals shoot the wrong wolves, shoot breeding pair members when they were not supposed to be targeted, and the accidental trapping and poisoning of wolves. We have even repeatedly lost wolves when the Department was simply trying to dart and collar these animals. There is simply too much at stake to risk members of the public with these sensitive tasks.

Also there are no suggestions in the plan for how to hold members of the public accountable if this controlled take authority is misused either mistakenly or intentionally. The Department on the other hand has built in accountability structures and public processes that ensure proper action. Our organization is deeply uncomfortable with this "controlled take" proposal.

On the recent telephonic update the Commission had with the Department, the Department admitted that the controlled take proposal is no related to limited agency resources. If the agency has the capacity to carry out lethal control orders itself, it is unclear why this is even being suggested. We have recently supported increased wolf capacity for the Department, this should not be considered. Public shooting and trapping of the wolves is inappropriate.

We recommend amending the plan as follows:

Eliminate Chapter III

Eliminate Subsection 4 starting on page 51

Eliminate "the use of controlled take in certain situations," from Page ii Line 17

These changes should eliminate the controversial controlled take proposal from the plan.

Killing Wolves in Response to Ungulate Decline

The Department focused as part of this plan update on the science section pertaining to wolf-ungulate interactions and does a noble job of updating this section. The science section concludes that “a complex suite of abiotic, bottom-up, and top-down forces including hunter harvest, predation, primary productivity, and climatic conditions that may be limiting or regulating factors of ungulate population dynamics (Crête 1999, Melis et al. 2009, Griffin et al. 2011, Brodie et al. 2013, Johnson et al. 2013).” Draft Plan at 56.

The review of the science and the direct experience of the Department in Oregon “suggests that wolf predation on [elk] is largely compensatory (Garrott et al. 2009) and will have minimal effects on elk population growth rates.” Draft Plan at 57. Compensatory means that any wolf kills largely replace kills that would have occurred from other predators. *Id.* The plan states that some scientists have suggested that wolf behavior could affect ungulate migration patterns and behavior, but “little research has linked the anti-predator behaviors...to reduced fitness and/or reproductive output of ungulates (Lind and Cresswell 2005).” *Id.*

So there were two important findings in this science review: that ungulate populations are largely regulated by habitat and climate, and that wolf predation is largely compensatory, they are killing animals that would be lost by other causes regardless. *Id.* at 57. The Department also takes a thorough look at the evidence in this state and neighboring states with wolves, and all the evidence gathered by these agencies suggests that wolves are not having a measurable impact on ungulate populations.

The 2005 wolf plan had initially included a provision to allow for killing wolves in response to wolf-ungulate problems, but it was very limited to localized and specific problems. The original language of the wolf plan stated that: “When predation is determined to be the primary cause of ungulate population or recruitment decline locally or in a WMU, ensure carnivore-focused management actions...If wolves are determined to be the cause of ungulate population or recruitment decline...use translocation, relocation or controlled take to reduce wolf numbers.” 2010 Wolf Plan at 65. This was a two-step determination, requiring the Department to establish that carnivores were indeed the primary cause of the decline, and then specifically that wolves were the cause, prior to initiating killing of wolves in response. This was a precautionary, science based approach that erred on the side of not spending resources killing until the Department was confident it would address the problem. The Plan discusses a specific situation in Canada where a small population of Caribou, only 20 individuals remaining, were being targeted by a single wolf pack, and this would be the type of situation where this controlled take provision would be used.

So again we have this update of the ungulate science section, which concludes wolves are almost always not going to be the cause of decline, but the Plan provides that in some very bizarre limited situations, potentially involving Columbia white tail deer, the Department has the authority to step in and use controlled take. You have also have all the actual evidence over the past decade that wolves are not causing ungulate decline.

Thus, it would follow that the Department would perhaps eliminate this ungulate conflict wolf killing provision, or perhaps just leave it as-is, but instead the Department is now proposing to greatly expand this authority, despite soundly rejecting its scientific basis. Now the Department can authorize the lethal killing of wolves to address ungulate decline “if ODFW determines that

wolves are a major cause of the population not meeting established ungulate objectives or herd management goals in a WMU, active management (e.g., non-lethal methods or lethal removal) of wolves may be used.” Draft Wolf Plan at 73. Putting aside the fact that this far looser language directly conflicts with the science section, this proposed new language is problematic for two additional reasons. First, a “major cause” is vague and gives the agency far more discretion. ODFW was specifically asked why this standard was relaxed, and the Department explained that it could not scientifically establish a link between wolves and ungulate decline, so they relaxed the standard. This is wildly inappropriate, if a link cannot be established, it is because wolves are not causing the decline or are not a significant factor in the decline, and thus we should not be killing to address this problem because it will not work.

We recommend amending the plan as follows:

Page 73 Line 33: Eliminating the Phase I and II qualifier so that the Department may use non-lethal measures and translocation to address ungulate issues in all phases

“If ODFW determinates that wolves are a major cause...”

Page 73 line 37 through Page 74 line 15: Eliminate all of this language

Any time there is ungulate decline in wolf territory, there will be hunters beating down the Department door arguing that wolves need to be hunted. Likewise, conservation groups will argue that wolves are not a “major factor.” This vague language will lead to conflict. It sets the stage for poor, political-motivated decisions that will only serve to blow up the wolf issue in Oregon.

And secondly, it will call into question and invite more scrutiny of the Department’s ungulate objectives, which I do not think the Department truly wants. Arguably many of the game management unit objectives are arbitrary in the first place, and wolf killing determinations hinging on these objectives will invite intense scrutiny on these numbers and how they were developed.

Wildlife Services

One of our major concerns is the involvement of Wildlife Services in livestock depredations. The livestock depredation investigations are the most vital part of the Department’s chronic depredation determinations and ultimate decisions to kill wolves in Oregon. Thus far, the Department, in the few times it has had to kill wolves, has been very cautious about making chronic depredation determinations and has approached this issue with diligence and integrity. It was for this reason that the Department was able to kill the Imnaha pack, the first pack in Oregon, the pack that sired OR-7, without a massive out pouring of criticism and conflict. It was due to the integrity of the chronic depredation determination, and foundational in that credibility is the depredation investigations.

Wildlife Services lacks integrity, lacks public trust and its involvement in these depredations will undermine all confidence in any future chronic depredation determinations. This agency has a proven track record in Oregon of blaming wolves when wolves were not responsible, and for this reason this agency was removed from its role in investigations in 2010.

There have been so many instances of animal abuse, the poisoning of people and pets, egregious mistakes like the killing of the wrong wolves, but even putting this aside, this agency has a proven track record of grossly overestimating when wolves have been involved in depredations here in Oregon. They have routinely found that wolves are involved in depredations, where the Department came in later and found that wolves were not involved, that carcasses had been moved, and reports inaccurate. For this reason, Wildlife Services was removed from participation in livestock depredation investigations in Oregon in 2012. I would like the Commission to ask the Department why now we should be including this agency after this previous track record.

We recommend amending the plan as follows:

Page 133 Line 2: Delete “Wildlife Services”

“If ODFW determinates that wolves are a major cause...”

Page 133 Line 20 through 24: Delete all of this language

Page 133 Line 32: Delete “Wildlife Services”

Caught-in-the-Act

ORS 498.014 requires that prior to exercising caught-in-the-act authority a livestock producer must have been implementing non-lethal measures. *See* ORS 498.014(3). The Department has eliminated this requirement from its draft plan. We ask the Commission please request that the Department insert this statutory requirement. This requirements aligns the plan and the Department’s emphasis on conflict prevention.

Thank you for the opportunity to submit these comments.

Nick Cady, Cascadia Wildlands

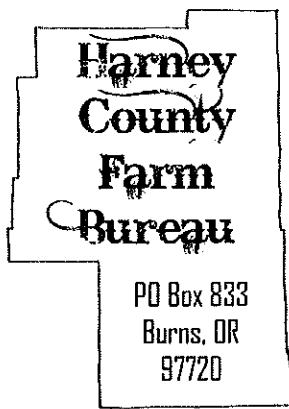
Roxann B Borisch

From: TI Ranch <ti.ranch@hughes.net>
Sent: Wednesday, May 22, 2019 5:23 PM
To: odfw.commission@state.or.us
Subject: Harney County Farm Bureau comments on the 2019 revised Oregon Wolf Conservation and Management Plan.
Attachments: letter to commission 5_23_19.docx

Attached are Harney County Farm Bureau's written comments on the 2019 revised Oregon Wolf Conservation and Management Plan.

--

TI Ranch
Thurston (Rusty) D. Inglis
58830 Lava Bed Road
Princeton, Oregon 9772
Home Phone: 541-493-2117
Cell Phone: 541-413-0778



Date: 5/23/2019

Chair Finely, Director Melchner, members of the commission.

My name is Rusty Inglis, I ranch near Burns, Oregon in the small community of Princeton. I am the president of the Harney County Farm Bureau, the chair of the Oregon Farm Bureau livestock committee and a long time member of the Oregon Cattlemen's Association.

You are going to hear from many livestock producers on what changes are needed to improve the existing Oregon Wolf plan, but today I want to talk to you about how the process should have worked. The process should of been just what the plan stated, a review of the current plan, instead it appeared to me that it turned out to be a rewrite. A review should of consisted of seeing what worked well and what didn't.

The facts show that the plan was a success. We now have a viable population of grey wolves in Oregon. Based on ODFW figures, we went from 14 wolves in 2009 to more than 137 wolves in 2018 with a 36% increase in breeding pairs. We have progressed from phase 1 to phase 3 in the eastern management zone and there is no doubt that we will move from phase 1 to phase 3 in the western management zone.

However that success has come with a high cost to the livestock industry, confirmed depredation incidents by wolves increased 65 percent from last year, higher stress levels on the cattle resulting in lower pregnancy rates and decrease in weight gains, and it is the family ranchers that are bearing all that costs.

The changes to the plan that you are going to hear from the livestock community have been well thought out and are drastically needed to help protect the lively hood of the family ranchers hear in Oregon, along with the rural communities they live in. Ranching is the mainstay economic driver in most of the rural communities here in Oregon. In Harney County alone, the livestock industry accounts for over 60 million dollars in livestock sales per year providing over 540 direct jobs and an additional 360 indirect jobs. So whenever a ranching family experiences economic losses the whole community looses, and Harney County unemployment rate is pushing 6% already.

So I ask you today to put politics aside, and to weigh in heavily on the changes that the livestock community is asking for. After all it is the ranching community that has given the most both

economically and emotionally to the existence of wolves here in Oregon, and we have stayed at the table during the entire review process.

With that said, Harney County Farm Bureau fully supports the comments submitted to you by the Oregon Farm Bureau.

Thank you for your time.

Sincerely,

//Thurston D. Inglis

Thurston (Rusty) D. Inglis
Harney County Farm Bureau President

Roxann B Borisch

From: Randy and Pam Comeleo <rottyler@peak.org>
Sent: Thursday, May 23, 2019 11:11 AM
To: ODFW Commission
Subject: Wolf Plan Comments for June Fish and Wildlife Commission Meeting
Attachments: Wolf Plan Comments for June Fish and Wildlife Commission Meeting.docx

Hello -

Attached are my comments on the revised Wolf Plan for the June Fish and Wildlife Commission meeting.

Thank-you.

Randy Comeleo
Corvallis

Dear Commissioners,

Thank-you for the opportunity to comment on proposed revisions to the Oregon Wolf Conservation and Management Plan.

Rather than reducing protections for wolves I believe the Commission should proceed with caution and restore strong protections in the revised Management Plan until wolves are present in ecologically significant numbers throughout most of their historic range in Oregon.

Key questions regarding population growth and dispersal of wolves in Oregon remain unanswered. A simple comparison of minimum year-end wolf population numbers in Oregon and Idaho reveals that the population of wolves in Oregon grew at an unusually slow rate during the first ten years of recovery (Table 1 and Figure 1) even though both states contain roughly similar amounts of available habitat. The reasons for slow wolf population growth in Oregon should be fully understood before reducing protections for wolves in the revised Management Plan.

Table 1. Minimum year-end wolf populations in Oregon and Idaho during the first decade of recovery.

Oregon		Idaho	
Year	Count	Count	Year
2009	14	14	1995
2010	21	42	1996
2011	29	71	1997
2012	48	114	1998
2013	64	156	1999
2014	81	196	2000
2015	110	261	2001
2016	112	289	2002
2017	124	362	2003
2018	137	418	2004

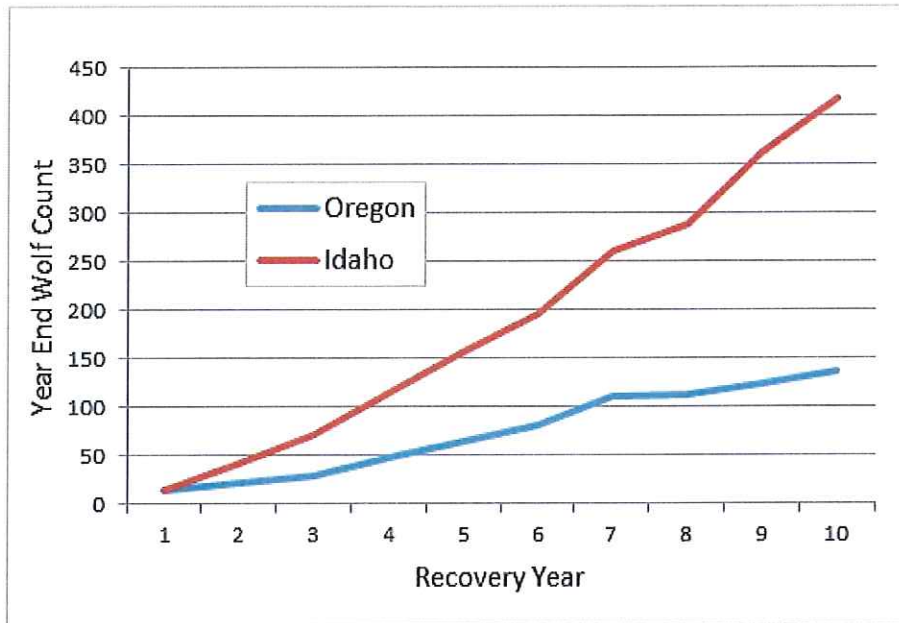


Figure 1. Oregon vs. Idaho wolf population growth during first decade of recovery.

The clustered distribution of known wolves shown in Figure 1 in the Draft Wolf Plan raises questions about impediments to wolf dispersal in Oregon. Population estimates and maps from habitat/prey availability models indicate that Oregon could support as many as 1450 wolves in the Blue Mountains, Cascades, and Coast Range. Simple mapping of 'wolf' place names in Oregon (Figure 2) reveals the likely historical distribution of wolves in the state. The reasons for limited wolf population dispersal in Oregon should be fully understood before reducing protections for wolves in the revised Management Plan.



Figure 2. Potential historical wolf distribution created using 'wolf' place names from the USGS Geographic Names Information System.

Gray wolves currently occupy only a small portion of their likely historic range in Oregon. Wolves should be present in ecologically effective numbers throughout most of their historic range in Oregon before protections are reduced in the Wolf Management Plan. This will allow recovering populations to withstand existing threats from human intolerance, inbreeding effects, poaching, vehicle collisions, deaths attributable to collaring activities, and disease.

- The threshold for "chronic depredation" should not be lowered to two instances in a 9-month period. Considering a pack of five wolves eats approximately 75 deer in 9 months, this proposed threshold does not constitute "chronic" depredation. The Plan should return to using the threshold of four qualifying incidents of depredation attributed to the same wolf or wolves in a 6-month period.
- Producers with livestock located in Areas of Known Wolf Activity must be required to establish and follow an area-specific non-lethal predation management plan to prevent conflict before requesting the state to kill wolves.
- With only 137 known wolves in Oregon, the Plan should not allow hunting and trapping of wolves by deputized citizens (controlled hunts) to artificially inflate ungulate numbers to achieve management goals.

- General season hunts should not be mentioned in the revised Plan. It is presumptuous for ODFW to assume that Oregonians will allow trophy hunting of this iconic carnivore at some point in the future.
- The Commission should immediately restore State Endangered Species Act protections for wolves in Oregon if the U.S. Fish and Wildlife Service removes federal Endangered Species Act protections for gray wolves.

There are important questions which remain unanswered regarding the slow rate of population growth and pattern of dispersal of wolves in Oregon. Rather than reducing wolf protections in the revised Plan, the Commission should continue to focus on public education and reducing conflict between wolves and livestock through responsible livestock husbandry practices and the extensive use of proactive, non-lethal predator deterrents.

Thank you for considering my comments.

Randy Comeleo
Corvallis, Oregon

Roxann B Borisch

From: Mary Anne Cooper <maryannecooper@oregonfb.org>
Sent: Thursday, May 23, 2019 11:09 AM
To: odfw.commission@state.or.us
Cc: 'jerome.rosa@orcattle.com'; 'ti.ranch@hughes.net'; Rodger Huffman
Subject: Oregon Wolf Plan Comments for June 7 Commission Meeting
Attachments: Wolf Plan Comments May 2019 FINAL.pdf; OFB Comments December 2017.pdf; OFB Comments May 2017.pdf

Good morning,

Attached please find comments and associated attachments on the Oregon Wolf Management and Conservation Plan revisions, submitted on behalf of the Oregon Farm Bureau and Oregon Cattlemen's Association for the June 7 Commission Meeting. Please let us know if you have any issues with the attachments.

Thanks,

Mary Anne

Mary Anne Cooper | Vice President of Public Policy
Oregon Farm Bureau
1320 Capitol St. NE, Suite 200, Salem, OR 97301
M: 541.740.4062 • **O:** 503.399.1701 x. 306 • **F:** 503.399.8082
maryanne@oregonfb.org • oregonfb.org



May 23, 2019

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

VIA EMAIL: odfw.commission@state.or.us

RE: Comments on the Oregon Wolf Conservation and Management Plan Revisions

Dear Chair Finley, Director Melcher, and Members of the Commission:

Thank you for the opportunity to comment on the draft Oregon Wolf Conservation and Management Plan (Draft Plan) released in April 2019. These comments are submitted on behalf of the Oregon Farm Bureau and the Oregon Cattlemen's Association. Our organizations represent farmers, ranchers, and rural landowners across Oregon who have been deeply impacted by the return of wolves to Oregon and who have a vested interest in the state's management of wolves. Our members raise cattle, sheep and other livestock in the areas where wolves have taken up residence in Oregon, and our options for managing wolves in these areas have been insufficient under the current Oregon Wolf Conservation and Management Plan.

Background on the Wolf Plan Update

Our organizations have been engaged in the Oregon Department of Fish and Wildlife (ODFW)'s management of wolves since the first Oregon Wolf Conservation and Management Plan was created, and we have been heavily engaged in the update of the Plan since it was initiated in late 2015. We have participated in both the informal and formal facilitated processes undertaken to update the Plan, have testified at several commission meetings, and had numerous conversations with all interested stakeholders about the Plan. During this time, we always came to the table in good faith looking to find the balance of wolf management that meets both the state's needs for conservation and our members' needs for increasing management flexibility for wolves as populations continue to grow in Oregon. We have always worked to find opportunities to build consensus around wolf management and a shared vision for wolf management in Oregon.

We approached this task with one fundamental concept at the forefront: the Oregon Wolf Conservation and Management Plan has been successful in achieving recovery and supporting a viable population of wolves in the state. We know this because wolf populations in Oregon have increased exponentially since the first wolves came into the state a little over a decade ago, going from one wolf in 2008 to over 137 wolves in 2018. And these are minimum numbers, with the actual number of wolves likely exceeding this count significantly. Wolves also now occupy a statewide range, with dispersal occurring from Northeastern Oregon to the Oregon coast. Oregon's trend follows the trend west wide. There are now more than 5,000 gray wolves in the United States, and more than ten times that number in Canada. Indeed, wolf recovery has been such a significant success story that the United States Fish and Wildlife Service is considering

federally delisting the gray wolf and leaving management of the Wolf to the state. In doing so, this administration would be the third administration in a row to recognize wolf recovery and work to delist wolves. This is good news for Oregon - Oregon's Wolf Conservation and Management Plan has demonstrated that federal delisting is not misplaced, and that Oregon's plan is capable of protecting and promoting wolf populations within our borders.

To this end, our organizations came into the Plan review with three primary requests that we believed would continue to increase rancher tolerance for wolves while ensuring the continued conservation of the species. Specifically, for the past three years, we have requested the following updates to the plan:

1. Local, evidence based-depredation decisions: ODFW should allow the local field biologist, local law enforcement, or USDA Wildlife Services personnel trained by ODFW to make depredation determinations in their area upon reviewing evidence. We believe these trained professionals should be authorized to determine whether to take lethal or non-lethal measures after two confirmed depredations. This reduces the risk of losing precious time once a science-based determination has been made on the ground and removes the potential for politicizing or unnecessarily delaying decisions.
2. Collaring: ODFW should continue to place collars on packs into Phase III management, with an emphasis on wolves that are the most likely to be in conflict with domestic livestock. While the Draft Plan emphasizes the importance of collaring in Phases I and II, the Draft Plan needs to continue a strong emphasis on collaring in Phase III.
3. Management Zones: ODFW should establish management areas, and set objective population targets based on the wild ungulate populations so that wolf populations do not exceed their natural carrying capacity. Setting a minimum population does not achieve this goal – as populations grow, the need to set population carrying capacities is critical. While the Draft Plan mentions population modeling as something that may be done in the future, there are no concrete steps to ensuring this occurs in the Draft Plan.

The need for these changes was outlined in significant depth in our comments submitted in May 2017 and December 2017, and discussed by our groups extensively through all the stakeholder processes. We have attached these comments for additional background.

Comments on the Draft Plan

Despite our strong justification for these changes and our persistent advocacy through the process, we were disappointed to see that these changes were not adopted in the Draft Plan. We worry that without additional localized management as wolf populations continue to skyrocket, the Plan will only increase conflict with agriculture in our rural communities and continue to place the burden of wolf management solely upon Oregon's ranchers. This is not a result that works for rural Oregon – the state must accept responsibility for wolf management, and work to timely address conflicts in the face of increasing wolf populations and a growing wolf range.

That said, we understand the pressure that the Commission and ODFW face from the environmental community as the Plan is developed. Despite the Plan's success in recovering wolves in Oregon, and the attendant population growth we've seen, Oregon Wild, Center for

Biological Diversity, and Defenders of Wildlife have demanded several changes during the mediation process. These requested changes to the Plan would disrupt the Phased approach toward wolf recovery and leave Oregon stuck in Phase I management, even as populations begin to approach their carrying capacity in some areas. They would drastically reduce options for dealing with wolf-livestock conflict, and leave ranchers footing an even larger bill for wolf recovery. This approach is contrary to the recovery we've seen in the state and would result in a severe decrease in tolerance for wolves in the rural communities where wolves reside.

We were very disappointed that these groups did not appear to come to the mediation in good faith, making demands that did not match the population realities in the state. We were even more disappointed when they demanded reduced management flexibility for ranchers in the face of Oregon's ranchers honoring their end of the bargain under the original Oregon Wolf Conservation and Management Plan and helping recover the wolves to the levels they are today. Decreasing management options in the face of increasing populations will not work for our membership, will not increase tolerance of wolves, and will not begin to normalize wolves in the way we've normalized coyotes, cougars, and bears, all of which are now thriving in Oregon. Ranchers have borne much of the burden of wolf recovery in the state, facing losses to herds that have devastated some operations, all without sufficient tools to be able to protect their livestock, fund necessary non-lethal measures, or be compensated for losses when they occur. Demand for non-lethal funding and compensation have always fallen far below the need for those programs, a situation that will continue to grow worse as populations increase. Despite these challenges, we've honored our commitments under the Plan.

As such, we were shocked when Oregon Wild, Center for Biological Diversity, Cascadia Wild, and Defenders of Wildlife left the mediation table after seeing a proposed draft plan where all of their demands were not addressed. Oregon's agricultural community came to the table willing to negotiate and seek common ground, but we cannot negotiate in the face of unyielding demands.

While we are disappointed that we did not get the changes we asked for in the Plan, we believe that the agency did a commendable job balancing several competing interests and updating the Plan in a way that will protect wolves while providing some very limited tools for rural ranchers to protect their livestock and reduce conflict. We understand the careful balance that ODFW was working to strike with the draft Plan and understand how challenging their charge was in the face of opposing sides that did not see eye to eye on any issue. We believe most of the proposed changes to the Plan meet the agency's charge of "reviewing and updating" the Plan to address the last ten years without adopting any major changes that could disrupt our current wolf management in Oregon, which has been a success from a conservation prospective.

To that end, we have some minor additional comments we believe will not drastically change the intent of the Plan, but will provide some clarity for ranchers who must live with wolves in their day-to-day lives:

- **Relocation** (Page 13) – The Draft Plan talks about both translocation and relocation of wolves. From the Draft Plan's language, it appears that the two concepts are similar, but translocation is done to meet conservation objectives while relocation is done for other reasons (for example, relocating wolves who have taken up permanent residence in a

problematic area). While translocation requires a public process, relocation does not. The plan goes on to state “Prior to conducting any active relocation of wolves within the state by ODFW, the governing body of each county may choose to hold a public hearing regarding such action. The existence of such a hearing shall not be a precondition to ODFW acting to relocate wolves as needed, nor does it in any way limit ODFW’s legal authority over wildlife management.” However, it does not appear that the Draft Plan requires notification to the impacted counties about the planned relocation. Our members are very concerned about wolf relocation, particularly in areas where there are active livestock operations. To that end, we agree that it is appropriate for a county to have a hearing within the county prior to ODFW undertaking any relocation. The Draft Plan should be amended to require at least 14-day notice to the impacted county of any planned relocation in that county to enable the county to have a hearing on the impacts of the relocation.

- **Wolf dispersal** (Page 25) – The Draft Plan notes that wolves are not known to be found at the coast at this time. We understand that a trail camera caught a wolf on the south-central Oregon coast last year, and we’ve heard reports of other sightings from coastal residents. This statement should be updated to reflect that there have been reports of wolves at the Oregon coast.
- **Attitudes toward wolves** (Page 25) – The Draft Plan notes, almost in passing, that adequate management tools can affect the tolerance for wolves. We believe this point needs to be emphasized more strongly in the Draft Plan. One of the reasons we’ve been requesting greater emphasis on local, evidence-based depredation decisions is that as wolf populations grow and interactions with wolves become more common, livestock producers need assurance that impacts to their operations will be addressed swiftly and decisively. If this can be achieved, tolerance for wolves will remain in rural communities. If wolf management becomes more cumbersome and less responsive as populations grow, tolerance for wolves will decrease.
- **Controlled take** (Pages 20, 31-32) – The Draft Plan retains controlled take as a potential management tool, though further Commission action will be needed before this tool could be utilized. While our organizations are primarily concerned with ensuring that management occurs where there’s significant conflict or once populations reach the natural carrying capacity, regardless of the tool used to ensure management, we believe that hunting is an important tool to maintain in the toolbox for when it’s needed in the future. Hunting provides revenue for wildlife management, ensures adequate take to meet conservation objectives, and does not create the same issues as relocation, sterilization or other tools that could be used to manage populations.
- **Wolves and livestock**
 - *Losses to wolves* (Page 33) - the Draft Plan provides rough statistics on losses of livestock to other predators, such as coyotes and cougars. While all predators can cause livestock loss, wolves are a unique predator to the livestock industry because 1) they frequently target larger livestock, 2) they cause significantly more damage per incident than other predators, and 3) there are very limited management tools to address wolves compared to other predators. We request that this is noted in the section talking about losses to other predators.
 - *Confirmed depredation* (Page 34) – the Draft Plan provides statistics around confirmed depredations in Oregon. The actual number of depredations are likely

much higher than the number of confirmed depredations, due to the fact that many producers do not report losses since it is so difficult to get ODFW to confirm that a loss is due to a wolf. While the plan notes that the reported number does not capture every instance of wolf depredation, and that actual numbers are likely much higher, we would like to see this acknowledged more directly in the Draft Plan. Further, this fact underscores the need for local, evidence-based depredation determinations and allowing others to be trained to review depredation events and determine what occurred so that these investigations are completed in a timely fashion.

- *Non-lethal deterrents* (Pages 38-41) – the Draft Plan fails to acknowledge the cost to producers of implementing non-lethals, and the fact that the state lacks the resources to help fund non-lethals at the level that would be needed for them to be effective statewide. Given that ODFW has always required demonstration that preventative measures were taken prior to moving to lethal take, the use of non-lethals has been a real cost of wolves in Oregon that has been significant for producers. This should be acknowledged in the Draft Plan.
- *Lethal control* (Pages 41-43) – the Draft Plan contains quite a winding survey of the science around lethal control, which it notes is far from settled in Oregon. The ability to move to lethal control to address chronic depredation is critical to livestock producers and an essential part of creating a Plan that all stakeholders can buy into. As wolf populations increase, it is important that producers have the tools needed to ensure that their livestock operations are protected, while at the same time ensuring that conservation objectives for wolves are being met. We believe that the current Plan errs on the side of conservation to the detriment of livestock producers, as shown by the rapidly increasing wolf populations. The Draft Plan continues to err on the side of conservation, making it very difficult to move to lethal control when there are problem wolves.

Comments on the Draft Rules

Oregon Department of Fish and Wildlife has also proposed updated rules to accompany the Draft Plan for adoption at this Commission meeting. We provide the following comments on the Draft Rules:

- **Lethal Take** (Rule Page 11) – the Department is proposing to move from the standard of two depredations OR one confirmed paired with three attempted depredations to a standard of two confirmed depredations in nine months. We oppose eliminating the standard of one confirmed plus three attempted depredations as the standard for when the Department may move to lethal take. As discussed above, the Department does not often confirm depredations, and producers should have the ability to request lethal take if they have had one confirmed event and the same wolf is stalking their livestock and attempting three further depredations.
- **Documentation of non-lethals** (Rule Page 11) – the Department is also proposing to require “documentation” by the producer of appropriate non-lethals prior to moving to lethal take. While we understand that the Department has always required demonstration that a producer has worked to avoid conflict, we are concerned that the requirement for “documentation” will create a litigation risk for the Department, create onerous

recordkeeping requirements for the producer, and create a hurdle to lethal take when it's needed. A producer should be able to verbally describe the non-lethals they have implemented on their property to the Department without any "documentation" or record keeping required. We recommend amending the language to say that the non-lethal measures "are shown by the livestock producer." Otherwise, we are concerned that this requirement will be read by certain groups to require a non-lethal deterrence plan that our producers do not have the time or resources to prepare on their own.

Conclusion

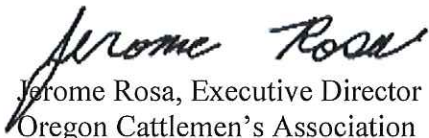
We are very disappointed that the mediated process for updating the Plan was not more successful, and that we remain so far away from agreement with Oregon Wild, Center for Biological Diversity, Cascadia Wild, and Defenders of Wildlife on the future of wolf management in Oregon. As you review the draft Plan and consider all of the comments, please remember Oregon's ranching community must live with wolves in our daily lives.

Thank you for the opportunity to comment, and please do not hesitate to contact us if you have any questions about our comments.

Respectfully,



Mary Anne Cooper
Vice President of Public Policy, Oregon Farm Bureau Federation
1320 Capitol Street NE, Suite 200
Salem, Oregon 97301
maryanne@oregonfb.org



Jerome Rosa, Executive Director
Oregon Cattlemen's Association
1320 Capitol Street NE, Suite 150
Salem, OR 97301
Jerome.rosa@orcattle.com

Roxann B Borisch

From: Eileen Hennessy <eileen.hennessy@yahoo.com>
Sent: Thursday, May 23, 2019 12:40 PM
To: odfw.commission@state.or.us
Cc: eileen.hennessy@yahoo.com
Subject: Draft Revised Wolf Conservation and Management Plan

May 23, 2019

Oregon Fish and Wildlife Commission

Subject: Draft Revised Wolf Conservation and Management Plan

ODFW:

As an advocate for the protection and preservation of endangered wolves, I am writing to submit my comments on the draft revised Wolf Conservation and Management Plan proposal by the Oregon Department of Fish and Wildlife (ODFW).

I fiercely OPPOSE the proposed changes to the Wolf Conservation and Management Plan as it seeks to make it easier for more people to kill wolves indiscriminately instead of encouraging peaceful co-existence through humane, non-lethal methods. Allowing such rampant slaughter of endangered wolves would further imperil this endangered species for the benefit of a small minority of special interests. This is NOT conservation.

Wolves were once extirpated from the state of Oregon and only now have they begun to slowly reclaim small portions of their historic territory. There are now an estimated 150 wolves in Oregon, hardly a viable number and a tiny fraction of what a fully recovered population should be. Delisting or calling for more killing is premature and only serves to pander to a small group of ranchers, not the MAJORITY of Americans, including Oregonians, who fully support wolf recovery and the use of sound, scientific, non-lethal management methods to ensure the survival of these amazing animals.

As a keystone species, wolves contribute significantly to the health of the environment and their presence greatly benefits other wildlife species in the area. Wolves are essential to maintaining a healthy ecosystem in myriad ways.

Wolves benefit wildlife, like bears and raptors, who feed on the carrion from wolf kills enabling them to flourish. A return of wolves is followed by regrowth of trees and shrubs which attract

birds. An increase of trees that control erosion makes river flows calmer, forming pools that become new habitats for beavers. Songbirds, fish, butterflies and plants also profit from this restorative effect stimulated by wolves known as trophic cascade. Without predators like wolves, biodiversity suffers and may cease altogether. The positive influence of wolves on the environment cannot be overstated.

Wolves also help heal the environmental damage to streams and riparian habitats caused by overpopulations of native ungulates, in areas where wolves have previously been eliminated and were unable to fulfill their role in keeping numbers of deer and elk in check, and by excess invasive livestock allowed to run rampant by ranchers who refuse to take proactive measures to control their animals.

Wolves play a vital role in the restoration of such areas, promoting healthier soils and, in turn, benefiting the vegetation and wildlife. Their presence of these apex predators on any landscape on which they appear should be encouraged, NOT condemned.

Wolves belong in Oregon and their continued presence in viable numbers must be a top priority. Those who selfishly plot their extermination of wolves for their own personal agendas simply do not understand their positive impact on the ecosystem.

ODFW's proposed changes are designed obviously to discourage wolf recovery and push this most important endangered species back to the brink. This plan would allow wolves to be hunted down and killed after only two attacks on livestock by the same pack and deputize private citizens to lead such hunts, including anti-wolf ranchers who report attacks, whether fabricated or not. There is stipulation in this plan to call for ranchers to implement non-lethal measures to deter or coexist with wolves before they may apply for a license to kill but often such requests are disregarded as lazy ranchers to not wish to exert any efforts defending their livestock when it is easier to just demand the lethal removal of any wolves in their area for which agencies appear too happy to comply. These are the same Oregon ranchers who have zealously called for the elimination of entire packs in the past. In fact, ODFW recently issued an order to kill pack members of the Harl Butte Pack for "claimed" depredations of livestock on public lands. It is clear ranchers are only out for their own interests and if that means the extermination of a critically important species that is so essential to the environment, the surrounding wildlife and the majority of the public, then so be it. Sanctioning such free-for-all wolf killing sprees by known wolf haters would increase opportunities for conflict and abuse and decrease social acceptance of wolves.

Research reveals that killing wolves is an ineffective strategy for reducing livestock depredations. Not to mention, the ambiguity regarding "probable" depredation claims considering the inherent bias of livestock ranchers against wolves is a serious issue that often condemns wolves, an even entire packs to death, with no proof of such allegations. It would

be wise to consider the source of such claims and how the eradication of the targeted wolves would benefit the claimant before ordering such deadly actions. Moreover, Wildlife Services is notorious for its extreme lack of transparency and public accountability, and therefore, this controversial agency must not be involved in any such investigations as the fate of the accused would most likely result in certain death.

Considering the intricacies of population dynamics, and the fact that wolf populations dwarf deer and elk numbers and wolves are more vulnerable to eradication, killing wolves in response to fluctuation ungulate numbers is not appropriate. Wolf population caps are arbitrary and biologically unjustifiable, and therefore must not be imposed on wolves.

Moreover, killing wolves harms wolf pack structure leading to young, inexperienced, or immigrating wolves to gravitate toward livestock predation. Another negative impact is the dissolving of packs or reproduction can be negatively impacted resulting in a potential threat to recovery in populations with few breeding pairs. Dwindling wolf populations in surrounding states, combined with delisting in Oregon, is not a recipe for ensuring sufficient genetic diversity or connectivity.

Life-saving protections for endangered wolves must be significantly increased, and non-lethal deterrents must be a requirement.

The propensity for blaming wolves for destruction of habitat and predation caused by unchecked grazing by ranchers' livestock who belligerently resist taking proactive simple measures to protect their livestock must stop.

Documentation exists proving the widespread livestock overgrazing and trampling of sensitive areas like streams and stream-side riparian areas in the Ochoco, Malheur, Umatilla, and Wallowa-Whitman National Forests. Such commercial activities damage the ecosystem, wildlife and water quality. Beneficial species such as wolves must not be edged out to accommodate an increase of ecologically destructive private livestock on our public lands.

Native wildlife, especially endangered wolves, have more right to be on OUR public lands than invasive, destructive, excess livestock. Ranchers grazing on public lands is a PRIVILEGE, NOT a right. Yet their interests are persistently elevated over those of our nation's endangered, wildlife and the health of the landscape. Such preferential treatment to appease a small minority must not continue.

Oregon must not be complicit in the extinction of an endangered species simply to pacify a small minority of special interests. There are myriad humane methods of peaceful co-existence with wolves, and they MUST BE PRIORITIZED in any wolf management plan. Killing -- including wiping out entire wolf packs -- is UNACCEPTABLE!

This wild wolves of Oregon have NOT yet recovered and, therefore, MUST BE PROTECTED at all costs as, once gone, they may never have another chance to return to their rightful place in the state to the detriment of the ecosystem, the wildlife and the American people as wolves belong to ALL Americans -- not merely to the states in which they occur. The more tolerant we become and the more we learn to appreciate the incredible benefits of the presence of wolves in our country, the better chance this extraordinarily valuable species will have to reclaim their historic territory and spread into other states, including the Northeast, where they formerly roamed. Such a successful dispersal would be to the benefit of ALL.

Any proposal that allows for the wholesale slaughter of wolves by any means possible and by anyone who feels like it with no call for peaceful co-existence and non-lethal methods, would sentence this fragile population to oblivion.

Therefore, I strongly OPPOSE any revisions to the Wolf Conservation and Management Plan, that will, in any way, further endanger the future survival of wolf recovery in Oregon and fully support strong protections along with promoting the expansion of viable wolf numbers in the state and continuing to forward portions of the Wolf Plan to reduce conflict through effective, non-lethal controls that promote wolf recovery instead of demonizing this essential species.

Thank you for your serious consideration of my comments on this most urgent issue that affects ALL AMERICANS.

Sincerely,

Eileen Hennessy
39 Berwick St.
Melrose, MA



OREGON HUNTERS ASSOCIATION

Protecting Oregon's Wildlife, Habitat and Hunting Heritage

P.O. Box 1706, Medford, OR 97501 • (541) 772-7313
oha@ccountry.net • oregonhunters.org

June 7, 2019

Re: Draft Wolf Plan Approval

Dear Chair Finley, Commissioners, and Director Melcher,

For several years the Oregon Hunters Association (OHA) has expressed strong support for responsible management of wolves in Oregon. We feel that the Draft Oregon Wolf Conservation and Management Plan, dated April 2019, fulfills these responsibility requirements – both for the well-being of the species, and in concern for future big game hunting opportunity. From our perspective this plan is not perfect, but it is very thorough and already proven in effectiveness. This 2019 draft reflects considerable compromise and builds upon the successful recovery of this species as outlined in earlier versions of the Plan, dating back to the 2005 original version.

The compromises within this plan are a product of many stakeholder meetings, most recently a series of 5 meetings that were professionally facilitated. OHA has attended every meeting offered and we sincerely appreciate these opportunities for input. The stratified classification of wolves across Oregon makes species planning extra complicated, and we understand that protection has to vary from Phases I through III moving across our state. However, wolf population growth needs to be monitored closely with ever-increasing consideration for ungulate populations and livestock interests as more segments of Oregon achieve Phase III status. We encourage ODFW to continue current monitoring and expand into other proven techniques that combine latest science with practical and affordable innovation. Oregon would be wise to fashion a citizen science effort such as what is done in Montana with "Patch Occupancy Modeling."

Wolf recovery has been very successful in Oregon but that does not come without a cost, both to other valued resources and ODFW's capacity to manage all the state's wildlife. This plan lays out a solid framework for achieving these difficult objectives. Please vote to approve this draft version of the Wolf Conservation and Management Plan.

Sincerely,

Jim Akenson
OHA Senior Conservation Director
541-398-2636

Roxann B Borisch

From: Danielle Moser <dm@oregonwild.org>
Sent: Thursday, May 23, 2019 3:06 PM
To: odfw.commission@state.or.us
Subject: Written comment on Draft Wolf Conservation and Management Plan
Attachments: Oregon Wild Draft Wolf Plan Comment 5.23.19.pdf

Good Afternoon Chair Finley and Members of the Commission,

For your consideration, Oregon Wild's feedback and input on the latest Draft Wolf Conservation and Management Plan. Attached.

Thank you,

--

Danielle Moser
she/her/hers
Wildlife Program Coordinator
Oregon Wild
Phone: 503-283-6343 x 226



**OREGON
WILD**

Protecting Oregon's wildlands, wildlife, and waters since 1974.

www.oregonwild.org

May 23, 2019

Chair Finley & Commissioners,

On behalf of more than 20,000 Oregon Wild members and supporters from across the state, we are writing to provide feedback on the draft Wolf Conservation and Management Plan (draft wolf plan). Throughout this multi-year review process, we have submitted dozens of letters, comments, and suggestions for ways to improve the draft wolf plan. We have testified in public hearings, met with staff, and participated in good faith during the facilitated stakeholder process. We have also observed thousands of pro-conservation, pro-science comments submitted by members of the Oregon public to ODFW and the Commission.

Overwhelmingly, these comments have urged the agency to carry forward defensible, transparent, and enforceable standards that have been demonstrated to work to reduce conflicts between wolves and livestock. Comments have also urged you to strengthen sideboards around lethal action, to provide the public with more timely information regarding wolf management, to correct ODFW's lack of transparency in their decision-making, to put a greater emphasis on education and non-lethal conflict prevention, and not to implement any variation of public hunting and trapping.

Unfortunately, the current draft of this plan ignores these requests, and continues to double down on a broken management model that has failed wolves, the livestock industry, and the public in Idaho and other states across the West.

Oregonians deserve a science-based plan that leads to fewer dead livestock, fewer dead wolves, and less conflict. It wasn't that long ago, Oregon set a standard for the rest of the nation. Under previous management models, Oregon's wolf population grew while livestock loss, wolf killing, and other conflict dramatically decreased. With your leadership, Oregon could return to this successful model.

For your consideration, Oregon Wild would like to submit specific recommendations for improving the draft wolf plan.

1. Definition of Chronic Depredation

This is arguably the single most consequential piece of the draft wolf plan. In the original Plan framework, the definition matched in all phases. They no longer do. We have experience with several variations. Under the current Phase 1 definition that was in effect in Eastern Oregon from 2013 – 2015, we experienced increasing support for the plan and decreasing conflict while the wolf population grew. With all its components, the Phase 1 definition gives stakeholders certainty, incentivized earnest use of non-lethal measures, and allowed the agency to make defensible decisions. Wolves can be killed by the agency, but only in situations that can defensibly be called chronic and where meaningful non lethal measures have proven to be ineffective for the situation.

Recommendation: In line with the original framework of the plan and subsequent learning, change the chronic depredation standard to 4 instances of predation in 6 months. Only incidents of depredation confirmed by ODFW staff should be included in consideration of lethal control and where appropriate non lethal measures have been implemented to prevent conflict.

2. De facto Wolf Hunting and Trapping (Controlled Take)

The draft wolf plan allows de facto trophy hunting and trapping of wolves by deputizing the public to kill wolves on ODFW's behalf to protect big game hunting. Specifically, the draft wolf plan states: *"Controlled take by the public through hunting and trapping may be used in two circumstances as a management response tool to assist ODFW wildlife conservation and management efforts. i) Long term, recurring depredation of livestock.... ii) Wild ungulate populations not meeting established management objectives or herd management."*

Deputizing, permitting, or otherwise authorizing members of the public to do the agency's job or to offset costs is inappropriate. It is also inappropriate for ODFW to encourage animosity and prejudice within the big game hunting community towards these animals. Analysis of similar measures in other states has found public hunts actually served to increase incidents of illegal poaching, increased conflict among stakeholders, and worsened livestock losses. In Oregon, multiple polls have shown Oregonians strongly oppose wolf hunting and trapping.

Wolves are native carnivores, and they did not make their prey go extinct in the millions of years before big game hunters began targeting elk and deer in Oregon. Today they pose far less of a danger to these species than human poachers and habitat loss. While it is true they can locally reduce ungulate populations, that is not a bad thing. Big game management objectives are often arbitrary, and often seem designed to maximize hunting opportunities rather than protect the health of elk and deer herds, or their habitat. Elk numbers have actually increased in Northeast Oregon, where wolves have been in our state longest. Some of

those herds have now grown so large that they themselves are becoming a source of conflict over impacts to ranchers and agriculture, degradation of habitat, and declines in mule deer.

Allowing killing of wolves for eating their natural prey is misguided, particularly when ODFW is at the same time artificially inflating elk and deer numbers through activities like feeding stations. It is highly illogical to, on the one hand, spend public money on feeding stations designed to reduce the negative effects of inflated ungulate herds on agriculture, then at the same time kill the native carnivores that serve as a natural check on those populations.

Under the draft wolf plan's language, wolves can be killed both if ungulates decline and if they remain abundant. This is just the most egregious example of the vague language used in the plan, language that seems aimed at maximizing agency discretion while minimizing public accountability or oversight. Other parts of the draft wolf plan have been dropped for efficiency. This provision should be dropped as well. Killing wolves should be an option of last resort.

Recommendation: Remove provisions in the draft wolf plan which allow members of the public to hunt, trap or otherwise kill wolves, except in the unlikely circumstances of defense of human life or to stop active depredation on pets or livestock.

We urge the Commission to revise this fundamentally flawed draft plan before considering its adoption. The people of our state wish to see wolves and other wildlife conserved and managed as a legacy for future generations, not exploited under a management regime based on old prejudices and flawed assumptions. They deserve a Wolf Conservation and Management Plan, and an ODFW and Commission that reflect those values. Please revise this document, and ensure Oregon gets a Wolf Plan that will lead to a future with fewer dead livestock, fewer dead wolves, and less conflict.

Thank you for the opportunity to provide comment.

Sean Stevens
Executive Director

Roxann B Borisch

From: Lisa Smolenska <lisasmolenska@gmail.com>
Sent: Thursday, May 23, 2019 3:59 PM
To: odfw.commission@state.or.us
Subject: Wolf Plan comment

Dear ODFW Commisioners,

Thank you for reviewing my email comment on the current proposed wolf plan. I am a resident of Eugene Oregon, I live in the country outside the city, I live among predators and raise chickens, bees and goats. Our home is surrounded by forest and meat cattle farm land in the valley close by. I work as a scientist developing research tools for cancer therapy. I am an outdoor enthusiast, hiking, camping, fishing, skiing. My husband is a keen fly fisherman, mountain biker, bird and deer hunter. We spend our vacation dollars in Oregon and value wildlife and conservation. Our values and ideals are shared by many in our state and the local community.

We have some concerns regarding the current proposed wolf plan and I will try to cover them as succinctly as possible given the complexity of this matter.

To protect and enhance Oregon's fish and wildlife and their habitats for use and enjoyment by present and future generations.

My major concern is that as a member of the public that ODFW mission is set to support, the current plan is addressing hunting and farming interests and does not consider the interests and opinions of the large proportion (70%) of the public who support the survival of healthy wolf populations in our state.

The current plan opens the door to trophy hunting of wolves in our state, I wholly disagree this is a suitable tool for management of wolves and do not trust ODFW with judicious implementation of such a tool. There is no data to support that this would be an effective or suitable method and it sends a clear message that ODFW have buckled due to conflict of interests given the massive funding from hunting enthusiasts that ODFW receive, they are showing bias. Wolf packs are extremely complex and removal by hunters that can't or won't distinguish specific pack members often can lead to enhanced problems where livestock depredation has been the trigger to removal. The notion that hunting should be an open door is premature given the fact that populations have only increased 10%. These proposals appear to be rooted in nothing but financial concerns and beholden to hunting licence revenue and do not reflect the needs and wants of the majority of Oregonians. It seems corrupt and wrong. I ask for the commission to guide ODFW to reflect the changing needs and views on "use and enjoyment" for the majority of Oregonians.

Most Oregonians want wolves here and support returning some wild balance this keystone species can bring, much of the scientific data on wolves is contradictory and Oregon does not yet have enough of its own data to open the door to trophy hunting. Conservation groups withdrew from mediation therefore their views cannot be properly represented in the current plan which is inherently problematic to us.

I have a problem with some of the language and definitions within the plan, much of it leaves a lot to the discretion of ODFW and it's not clear how those particular situations will be handled nor does it describe precedence or current practice.

Things that are particularly problematic:

1. Hunting to be considered if Wolves are shown to be a "Major Cause" of ungulate decline. This is a wholly unsuitable term. Decisions to control wolf populations based on something that cannot have defined data behind it at this time is not suitable for the plan. Without the definition of what 'major cause' exactly is the statement should be removed. Either a clear indication of how the data or significance is arrived at should be included now or the statement should be removed until ODFW has line of sight to what that means exactly in real scientific data gathered terms. Currently it reads as though the criteria is really about hunting tags and not conservation or ecological balance. There are calls all over the state from deer and elk hunters for predator control due to declining populations of ungulates they are an easy scapegoat and while some lethal removal may temporarily help (in the case of cougars) to improve numbers this quick fix ignores the fact that habitat loss,

Roxann B Borisch

From: Michelle Dennehy <Michelle.N.Dennehy@state.or.us>
Sent: Thursday, May 23, 2019 5:05 PM
To: odfw.commission@state.or.us
Subject: FW: Planning commission meeting on June 7th

From: kathryn thompson [mailto:kathrynht@yahoo.com]
Sent: Thursday, May 23, 2019 8:49 AM
To: Michelle.N.Dennehy@state.or.us
Subject: Planning commission meeting on June 7th

To: Oregon Dept. of Fish and Wildlife

I hope the commission will bear in mind that many citizens of Oregon want to have the presence of wolves in Oregon's forests and other public lands.

The interests of ranchers can be considered without removing wolves from public lands in Oregon and while still respecting the rights of citizens who want to see their state maintain ecologically balanced, true wilderness. Tourism alone would make preserving it a financially wise decision.

With so few wolves in Oregon, especially in Western Oregon, it is unthinkable to consider legalizing hunting wolves. I sincerely hope that the commission will rule out any so-called "sport" hunting of this natural resource.

Oregon has the opportunity to maintain the natural resources and wild beauty that other states have lost, including its wide diversity of wildlife. It is because of its wild beauty and wide diversity of wildlife that, despite having lived in many other states, Oregon is the only state for which I have felt "homesick".

Kathryn Thompson
Central Point, Oregon

Roxann B Borisch

From: Pam and Randy Comeleo <rotyler@peak.org>
Sent: Thursday, May 23, 2019 4:55 PM
To: odfw.commission@state.or.us
Cc: ODFW Commission
Subject: Wolf Plan Comments for June Fish and Wildlife Commission Meeting
Attachments: Wolf Plan Comments submitted for June 7 2019 Commission Meeting_PBC.docx

Attached are my comments on the revised Wolf Plan for the June Fish and Wildlife Commission meeting.

Thank-you.

Pamela Brunet Comeleo
Corvallis

Dear Commissioners,

I appreciate the opportunity to comment on the proposed revisions to the Oregon Wolf Conservation and Management Plan.

EMPHASIZE NON-LETHAL METHODS

I was very pleased to see an expanded section on non-lethal measures for preventing livestock depredation in the Draft Wolf Plan; however, the plan lacks any requirement or incentive for individual livestock owners to actually USE these measures! Use of non-lethal deterrents BEFORE depredation occurs is critical for reducing conflicts and should be a REQUIREMENT before kill permits are issued, not simply a suggestion. A core principle of the Wolf Plan should be that killing wolves is an option of absolute LAST RESORT.

I cannot comprehend why the plan would emphasize non-lethal control techniques during Phase I and transition to a “more flexible approach” to depredation control in Phases II and III (“Strategies to Address Livestock Conflict” p. 44). Emphasizing non-lethal methods should be the primary approach in ALL 3 PHASES if the goal is to minimize conflict!

DEFINE “CHRONIC DEPREDACTION” CONSISTENTLY

The definition of “chronic depredation” should be “least 4 qualifying incidents of depredation of livestock within the previous 6 months by the same wolf or wolves” **for all management phases**. It is completely illogical to have different definitions of “chronic depredation”. The 4 in 6 definition, which was the result of a legal settlement, represented significant compromise, worked well, and came from lengthy negotiations. “Chronic” is “chronic” – the bar should not be lowered just to kill more wolves as they become more abundant.

MORE TRANSPARENCY IN DEPREDACTION REPORTS

Depredation reports used to provide information to the public about whether or not non-lethal deterrents were used PRIOR to a kill permit being issued due to a confirmed depredation. The revised plan should require a return to this increased and timely public transparency.

KILLING WOLVES TO INCREASE UNGULATE NUMBERS

Killing wolves to increase ungulate numbers is not scientifically defensible. ODFW’s own April 14, 2019 press release makes it clear how nebulous the connection between decreased elk and deer numbers and wolf predation is. Habitat loss from logging, off-road vehicles, and livestock, together with poaching, pose a vastly greater threat to deer and elk than wolves.

NO TROPHY HUNTING OR TRAPPING OF WOLVES

Trophy hunting (including keeping the pelts of wolves killed), general hunting or trapping seasons, or deputizing members of the public to kill wolves has no place in the management plan! This ignores not only science, but the wishes of the overwhelming majority of Oregonians. A recent poll found over 70% of the public opposes wolf hunting! Wolves should NEVER be used as a revenue stream for ODFW!

REINSTATE STATE ESA STATUS

The plan should stipulate that if wolves lose Federal ESA protections, Oregon should immediately reinstate State ESA protections.

I realize the plan has undergone extensive review and revision, but as this is the first opportunity for public input on the April 12, 2019 Draft, I hope you will not rush to approve this version. Further modification based on citizen input will not only improve the plan; it will increase public support for both the plan and ODFW.

Thank you for considering my comments.

Pamela Brunet Comeleo
Corvallis, Oregon

Roxann B Borisch

From: Amanda Wight <awight@humanesociety.org>
Sent: Thursday, May 23, 2019 3:40 PM
To: odfw.commission@state.or.us
Subject: Comments from HSUS on the draft revised Wolf Plan
Attachments: HSUS Comments on the OR Wolf Plan final.pdf

Hello,

Please see the attached comments on behalf of the Humane Society of the United States regarding the draft proposed Wolf Conservation and Management Plan. Please include these comments with the staff proposal as part of the review materials shared with Commissioners prior to the June 7 meeting.

Kind regards,
Amanda Wight

Amanda Wight

Wildlife Protection Manager, Wildlife Protection

awight@humanesociety.org
P 301-258-1414 C 202-339-2282
humanesociety.org



The Humane Society of the United States is the nation's most effective animal protection organization, fighting for all animals for more than 60 years. To support our work, please make a [monthly donation](#), give in [another way](#) or [volunteer](#).





**THE HUMANE SOCIETY
OF THE UNITED STATES**

1255 23rd Street, NW
Suite 450
Washington, DC 20037
P 202-452-1100
F 202-778-6132
humanesociety.org

Susan Atherton
Co-Chair

Thomas J. Sabatino, Jr.
Co-Chair

Kitty Block
*President and CEO and
Chief International Officer*

G. Thomas Waite III
*Treasurer
Chief Financial Officer and
Acting Chief Operating Officer*

Katherine L. Karl
*General Counsel and
Chief Legal Officer*

Michaelen Barsness
*Controller and
Deputy Treasurer*

Johanie V. Parra
Secretary

DIRECTORS

Jeffrey J. Arciniaco
Susan Atherton
Georgina Bloomberg
J. Elizabeth Bradham
Jerry Cesak
Neil B. Fang, Esq., CPA
Caren M. Fleit
Cathy Kangas
Paula A. Kislak, D.V.M.
Charles A. Laue
Kathleen M. Linehan, Esq.
Mary I. Max
C. Thomas McMillen
Sharon Lee Patrick
Marsha R. Perelman
Jonathan M. Ratner
Thomas J. Sabatino, Jr.
David O. Wiebers, M.D.

May 23, 2019

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

Re: ODFW's notice of proposed rulemaking on Oregon's Wolf Conservation and Management Plan

Dear Chair Finley and Members of the Commission,

On behalf of the Humane Society of the United States and our members and supporters in Oregon, we appreciate the opportunity to submit comments on the Oregon Department of Fish and Wildlife's (ODFW's) draft Oregon Wolf Conservation and Management Plan update (hereinafter "Plan"). The Plan fails to use the best available science and relies too heavily on lethal methods to prevent the recovery of the public's beloved, but tiny wolf population. Oregonians have a deep aesthetic appreciation for wolves, and value their extreme familial and sentient qualities, as well as the important trophic cascade they provide in their wild environments: especially in light of the looming extinction crisis. Wolves enhance the biological diversity and ecosystem function where they are recovered in ecologically-functional populations, and they deter diseases such as chronic wasting disease, a disease plaguing ungulates.

Yet, the Plan utterly fails to comport with sound science and people's values. It opens the door for trophy hunting and predator control of wolves under the guise of special permit authorization. The Plan fails to demand that Oregon's livestock growers be obligated to employ commonsense non-lethal methods (e.g., range riders, guard animals, electric fencing, fladry, night penning, fright tactics and removing carrion) to protect their livestock. Also, by failing to use sound science and relying on conjecture, the Plan wrongly asserts that killing wolves boosts ungulate populations.

Under no circumstances should members of the public be authorized to hunt or trap wolves

Under Phase III of the Plan, "controlled take" by members of the public through hunting and trapping may be used as a management response tool to assist ODFW wildlife conservation and management efforts in the event of long-term, recurring livestock losses and/or in the event that wild ungulate populations are not meeting established management objectives or herd management goals.ⁱ The plan also allows for controlled hunts for the same reasons, and states, "Controlled hunts (e.g., planned hunts with a specific timeframe, area boundaries and where the number of hunters is limited through a public drawing or other means) require Commission approval through the planning and hunt development public process." Furthermore, where controlled take is being implemented, cruel trapping may also be used for lethal management control. As we address in the sections below, the best available science demonstrates that killing wolves does not increase prey populations and likely exacerbates livestock conflicts, even as the U.S. Department of Agriculture's data show few livestock growers rely on non-lethal methods to protect their livestock.

Due to their social structure and life history, killing a single wolf causes a cascade of effects resulting in death and disruption beyond that individual. The best available science describes this as "additive" and "super-additive" mortality.ⁱⁱ Killing single adult wolves can result in the loss of *entire packs*, by causing the loss of dependent offspring and disrupting packs' social structure.ⁱⁱⁱ



Studies show that trophy hunting wolves causes additive-mortality effects especially strongly, since wolves' complex pack structure makes them particularly susceptible to social disruption.^{lv} The human-caused death of individuals harms wolves' family group cohesion.^{lv} Wolf populations exposed to heavy hunting experience increased stress and reproductive hormone imbalance.^{vi} The human-caused loss of breeding females has been shown to cause complete dissolution of social groups and abandonment of territory.^{vii}

Trophy hunting also causes artificial selection pressure on the hunted population, disrupting life histories and reproductive strategies and otherwise adversely altering a population's genetic fitness.^{viii} Trophy hunters choose prime-age, trophy-size individuals, which influences species' evolution: studies show that trophy hunting forces rapid evolutionary shifts in both the behavior and body size of mammalian populations,^{ix} and this response may change a species' ability to adapt, particularly when added to the burdens of habitat loss and climate change.^x

Numerous studies have detailed the realized and potential effects of legal trophy hunting on genetics of wildlife populations.^{xi} Population genetics, particularly genetic diversity and genetic effective population size, play a critical role in both short-term and long-term population viability.^{xii} As a result, the genetic changes caused by trophy hunting and trapping can have harmful consequences that ultimately elevate extinction risks and impede recovery.^{xiii} These changes include reduced gene flow and elevated structuring among populations, loss of genetic diversity and reduced fitness, and overrepresentation of heritable and sometimes maladaptive phenotypes due to exploitative selection.^{xiv}

The Humane Society of the United States is strongly opposed to any provisions that open the door to the trophy hunting and trapping of wolves in Oregon by members of the public, as several provisions in the Plan do.

A. Most Oregonians want their wolves protected and are opposed to the trophy hunting and trapping of them

The stated goal of the Plan is "To ensure the conservation of gray wolves as required by Oregon law while protecting the social and economic interests of all Oregonians" (Page ii). However, a number of polls and surveys of Oregon residents have demonstrated immense support for the continued protection of wolves, including from rural residents. Most recently, a May 2018 poll^{xv} showed that 63 percent of respondents support continued protections for wolves, including 52 percent of rural Oregonians. This was true across political spectrums.

Furthermore, 70 percent stated that they don't believe wolves pose an economic threat to the cattle industry that necessitates killing wolves (they are correct, and we will discuss the negligible effect that wolves have on Oregon's livestock industry below). These results were consistent with a 2015 poll.^{xvi} Additionally, a 2016 poll of 800 registered Oregon voters showed that 72 percent opposed changing Oregon law to allow the trophy hunting of wolves.^{xvii}

These sentiments are echoed across the country. Many studies and polls show that a super majority of Americans want wolves conserved, protected, and humanely treated.^{xviii} Most Americans don't even support killing wolves to protect livestock, according to a new national study, including 70.2 percent of Oregonians.^{xix} That is because a plethora of non-lethal alternatives exist that are efficacious, humane and more cost effective.^{xx}

The Plan drastically overstates both the need for lethal predator control and its effectiveness at addressing actual livestock conflict.

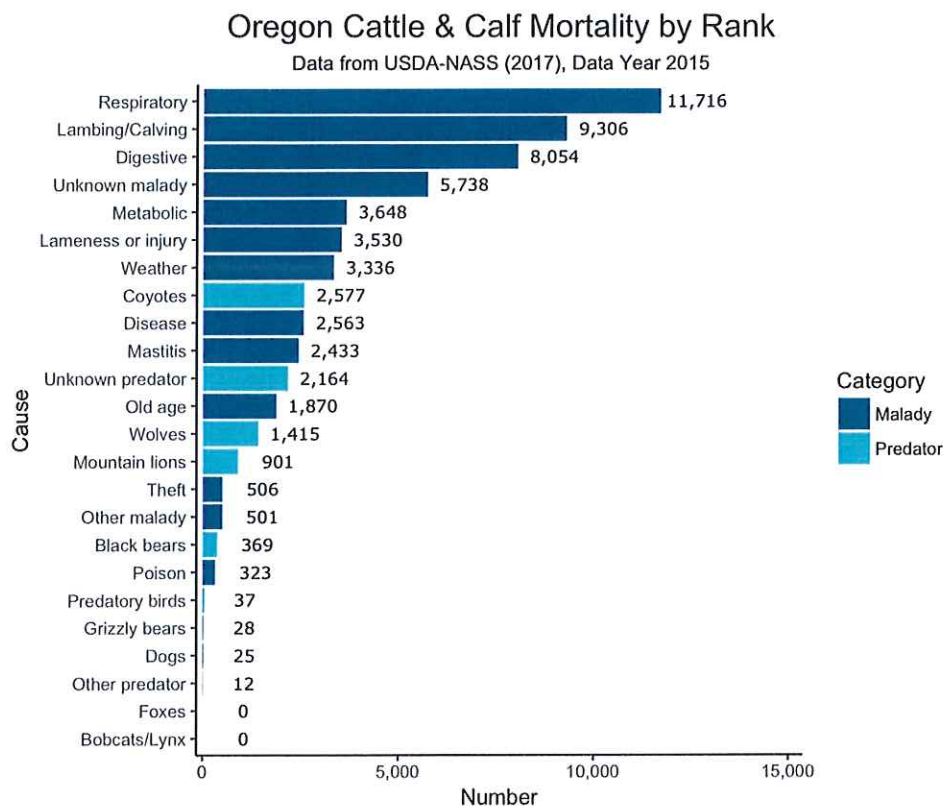
A. The definition of chronic depredation in Phases II and III is deeply concerning and not based on sound science

All native carnivores and domestic dogs together take few domestic livestock.^{xxi} Even using the U.S. Department of Agriculture's (USDA's) problematic data, one can quickly visualize that Oregon's ranchers have far more to fear from respiratory and birthing problems and weather events.^{xxii} Fig. 1. In Oregon, only 5.9% of all cattle operators lost cattle to any kind of predator, even as only 23.4% used any kind of non-lethal method to protect their cattle.^{xxiii} Oregon's sheep ranchers fail to adequately protect their livestock using a variety of non-lethal methods, USDA data show.^{xxiv}



On pages 50 and 51 of the Plan, ODFW defines chronic depredation as two confirmed livestock depredations within a consecutive 9-month period. While this marks a slight improvement over the current plan by including a temporal component, we remain deeply concerned with the low threshold required for livestock losses to be considered “chronic” and thus open the door for lethal removal. Two livestock deaths do not allow enough time for responsive, non-lethal methods to demonstrate their effectiveness. Even ODFW staff stated in the Topic Backgrounder for the October 9, 2018, WPSR meeting that, “If chronic depredation is viewed as a situation which is expected to continue or escalate if uncontrolled, the Oregon data clearly show that two depredations does not constitute a chronic situation.”^{xv} Lethal control should always be a last resort. Therefore, ODFW must increase the threshold for depredation to be considered chronic.

Fig. 1



B. Wolves have a negligible effect on livestock industries

In the United States, data show that wolves kill few cattle and sheep. While livestock predation data collected by various governmental bodies differ significantly due to differences in methodology, the most recent data published by the U.S. Department of Agriculture-Animal and Plant Health Inspection Service (USDA) show that farmers and ranchers lose nine times more cattle and sheep to health, weather, birthing and theft problems than to all native carnivores and domestic dogs combined. In Oregon, USDA data attribute just 1.86 percent of unwanted cattle and sheep losses to wolves, while a whopping 82.73 percent is attributed to non-predator causes, such as illness, birthing problems, and other maladies.^{xvii}



The USDA's methodology involved collecting data from a few, mostly unverified sources, which the USDA then extrapolated statewide without calculating standard errors or using models to test relationships among various mortality factors.^{xxvii} This likely resulted in exaggerated livestock losses attributed to native carnivores and domestic dogs. When government agencies *confirm* data on livestock losses, the results show many fewer livestock losses than the USDA's unverified claims. In Oregon, the U.S. Fish and Wildlife Service (FWS) attributed just 13 cattle and sheep losses to wolves using verified data—*109 times less* than the USDA claimed for that same year.^{xxviii} More recently, according to ODFW, just 30 calves were confirmed to have been killed or injured by wolves in 2018—a mere 0.002 percent of Oregon's 1,270,000 cattle and calf inventory.^{xxix}

Indiscriminately killing wolves through trophy hunting and trapping or lethal predator control likely exacerbates these already low instances of conflict with livestock.^{xxx} About wolves, Bryan et al. (2014)^{xxxi} write: "Hunting can also decrease pack size, which results in altered predation patterns, increased time spent defending kill sites from scavengers, and may lead to increased conflict with humans and livestock (Hayes et al., 2000; Wydeven et al., 2004; Zimmerman, 2014)." Killing wolves may shift livestock losses from cattle to sheep because of mesopredator release (coyotes).^{xxxii} While biologists have argued whether hunting wolves reduces livestock losses,^{xxxiii} subsequent studies have found that killing wolves does not improve livestock safety. For example, Santiago-Avila et al. (2018)^{xxxiv} recently reviewed a 17-year data set, demonstrating that the lethal removal of wolves for livestock protection reasons on one farm in Michigan increased future wolf predation on their neighbors' livestock. Killing wolves on one farm increased future predation risks by nine and 14 percent per year at local scales. Other studies also show that government and individuals' random wolf killings do little-to-nothing to protect livestock.^{xxxv}

a. Non-lethal methods to protect cattle and sheep are more efficacious

The Plan clearly and concisely summarizes many of the non-lethal deterrent and livestock husbandry practices available for farmers and ranchers to use. New studies show that the best remedies for protecting cattle, sheep and other domestic animals come from non-lethal measures, such as sanitary carcass removal, fladry and/or turbo fladry, synchronizing birthing seasons with native ungulates, changing livestock types or breeds, spot lights, air horns, guard animals, range riders, electric fencing and FoxlightsTM.^{xxxvi}

In a seven-year study of open-range sheep in neighboring Idaho, in an area where a variety of non-lethal deterrents were used (including human herders or "range riders"), sheep losses were the lowest in the state. Whereas in the nearby study's control area, where wolves are routinely killed, sheep losses were 3.5 times higher, demonstrating that non-lethal deterrents were far more effective than lethal ones.^{xxxvii} A number of other scientific reviews have questioned the scientific merit and efficacy of lethal predator control.^{xxxviii} In their review, Treves et al. (2016) strongly suggest that all lethal predator controls be suspended until "gold standard" reviews of the efficacy of some predator control methods are completed. Similarly, Lennox et al. (2018) also recommend against the expensive, broad scale killing of native carnivores.

ODFW's wolf management should be consistent with the latest scientific findings on non-lethal protections for livestock.^{xxxix} In that regard, ODFW must have an effective program and process to ensure that non-lethal tools were implemented appropriately before wolves are permitted to be killed (and only as a last resort).

Killing wolves will not grow ungulate populations

While the Plan includes a comprehensive review of the science pertaining to wolf-ungulate interactions, it still provides that lethal removal can be authorized under Phase III if ODFW, "has determined that wolves are a major cause of the population not meeting established population objectives or herd management goals (e.g., movements, use of key feeding areas, survival rates, nutrition, or other biological factors) and that the controlled take is expected to improve the situation." Prey populations are in decline across the West because of a myriad of anthropogenic causes and only rarely can this decline be attributed to wolves and other native carnivores. Therefore, the ODFW must use a scientifically-based approach to improve ungulate herd health that does not unfairly target the state's native wolves.

Not only does the best available science demonstrate that predator control doesn't boost ungulate populations, in several studies of predator-prey interactions, biologists have routinely found that human hunters, habitat loss or fragmentation, weather and climate change represent the greatest negative effects on ungulates.^{xl}



Alaska researchers, Prugh and Arthur (2015), found that wolf control in their Alaska study area led to the decline of Dall's sheep. With the loss of wolves, coyote numbers increased and they more readily preyed upon young Dall's sheep.^{xli} This phenomenon has been documented many times in several ecosystems. Top carnivores limit the population size of smaller carnivores, which reduces overall predation pressures,^{xlii} and this natural regulation is especially important for survival of neonate ungulates such as moose and caribou.^{xliii}

Additionally, Mitchell et al. (2015), in their study found that heavy persecution of both wolves and coyotes initially increased the number of Dall's sheep in their study area, but when the sheep population approached or exceeded the carrying capacity, which is a maximum population size set by the amount of forage available or "K", a severe winter (with deep snows and heavy crusting) counteracted population increases.^{xliv} Meanwhile in the reference area (where no predator control measures were implemented), the Dall's sheep population remained constant.^{xlv} In other words, natural predation on Dall's sheep was "compensatory," meaning it merely replaced mortality from weather and starvation. These biologists caution against predator control policies as a means of increasing prey herds.

Mitchell et al. (2015) warn:

We note that [ADFG] biologists have previously attempted to manipulate moose and caribou population in central Alaska using harvest and predator control (Boertje et al. 1996, 2009), without considering K [carrying capacity] (Bowyer et al. 2005). This strategy had negative results, not only for moose populations and [hunter] harvest, but also for agency credibility (Young and Boertje 2011). Managers now realize that carrying capacity (Seaton et al. 2011) is an integral component of effective management of moose populations . . . Management decisions regarding carnivore harvest should consider both the positive ecological roles of predators and the potential negative effects on both the carnivores populations, community ecology, and consideration (Roemer et al. 2009; Ordiz et al. 2013). This should help wildlife managers avoid the unintended consequences in various management actions.^{xlvi}

Wolves keep ungulate herds healthy by removing the sick, weak, and old animals^{xlvii} and limit starvation and die-off by mediating stochastic events such as prolonged drought or deep snow on ungulate populations.^{xlviii} They rarely prey upon the prime-age breeding animals favored by hunters.^{xlix}

The scientific consensus for the last several decades has generally concluded that carnivores modulate prey populations and make them more vigorous,ⁱ including removing the sick and weak animals which would die of other natural causes anyway.ⁱⁱ

For these reasons, predator-control schemes are an unreliable way to increase the abundance of ungulates.ⁱⁱⁱ Ironically, human hunters are responsible for the decline of large-bodied mammals.ⁱⁱⁱⁱ ODFW must not assume that by killing wolves, ungulate numbers will grow.

The Plan fails to address how climate change can and will harm wolves

Climate change will harm wolves indirectly. Climate change affects temperatures and moisture, affecting both plant growth and precipitation amounts.^{lv} Increases in fires, for instance, displaces prey, thus indirectly fire displaces wolves.^{lv}

Changes in vegetation will cause shifts in the herbivore community and these changes probably have the largest effects on wolves. Wolves are affected by changes in the trophic structure (plants-> herbivores-> wolves), but most of the effects on wolves are associated with herbivore dynamics.^{lvi} The complexity of the processes: the effects on plants will be a rather complex mixture of direct effects and changes in disturbance, insect herbivory, and mammalian herbivory and opportunities for exotic invaders. These, in turn will lead to differences in mammalian herbivore communities of all sorts from deer mice to moose and these will both affect and be affected by shifts in the carnivore community. To state what the effect of climate on wolves will be requires understandings and the ability to predict all of these processes.^{lvii}



THE HUMANE SOCIETY OF THE UNITED STATES

Climate change will cause numerous difficulties for wolves, and in some climates, those events have already occurred, presaging more to follow. Wolves, dependent on wild prey to avoid starvation, are indirectly harmed when plant communities are lost because of drastic changes in temperature. Stochastic weather events such as a midsummer snowfall covering plants and killing them caused numerous herbivores to starve and die.^{lviii} With no herbivores, wolf numbers dropped drastically, preventing wolves from raising pups as Mech (2004) recorded in the Arctic.^{lix} For wolves and other carnivores, climate change could degrade cached food supplies. Their food is highly perishable under warm conditions.^{lx} The loss of food to an individual is harmful to their survival and persistence.

In northern climates, winter challenges animals by making their foods scarcer while simultaneously making locomotion and staying warm costlier. For both ungulates and wolves, movement in deep snow costs them precious resources as they sink.^{lxi} Adaption to moving in snow is both physical (foot load to leg length—determines how much one will sink) and behavioral (animals can reduce travel speed, change gait or change habitats or travel paths (citing Moen 1976; Murray and Boutin 1991; Dowd et al. 2014)).^{lxii}

Droghini and Boutin (2017) write: “Grey wolves (*Canis lupus* L., 1758) cover greater distances and achieve faster speeds when travelling on linear features such as roads and seismic lines (Dickie et al. 2016). Trails that have been compacted from human use may also enable animals to travel long distances and access new areas while minimizing energetic costs (James and Stuart-Smith 2000; Crete and Larivière 2003).”^{lxiii}

Wolves use long-distance travel to locate prey (citing Mech 1970).^{lxiv} They are not as physically adapted to snow as some other species, but can adapt to snow by changing their behaviors, such as walking in places where snow is less deep or on compacted snows.^{lxv} In their study of boreal wolves in Canada, Droghini et al. (2017) found that wolves strongly selected pathways that had shallow, supportive snow.^{lxvi} With climate change, biologists anticipate that snow will change to more common events of freezing and crusting, which may harm both predators and their prey, depending on the snow conditions.^{lxvii}

Wolves can help prevent chronic wasting disease from arriving in Oregon or taking hold if it ever does.

Chronic wasting disease (CWD), an epidemic plaguing cervids that continues to spread across North America, has not been detected in deer or elk in Oregon.^{lxviii} Wolves and other native carnivores play a critical role in suppressing and limiting the prevalence of disease in prey species, including CWD.^{lxix} CWD is an inevitably fatal, infectious neurodegenerative prion disease affecting mule deer (*Odocoileus hemionus*), white-tailed deer (*Odocoileus virginianus*), elk (*wapiti*, *Cervus canadensis*), and moose (*Alces alces*).^{lxx}

Wolf predation can limit or even prevent transmission of CWD and other diseases in prey species by reducing host densities and contact rates or by lowering the total number of infected individuals in a host population.^{lxxi} Moreover, research indicates that coursing predators like wolves and coyotes select prey disproportionately if they appear impaired by malnutrition, age or disease.^{lxxii} Although much of this “selection” may be attributed to infected mule deer being less vigilant or fit and thus relatively vulnerable to “attack” of one kind or another, carnivores may also learn to recognize and more actively target diseased deer.^{lxxiii} Furthermore, wolves help eliminate CWD as an environmental contaminant by scavenging on infected carcasses, preventing disease spread through soils and other means of dispersal.^{lxxiv}

Studies found that wolf predation significantly reduces CWD prevalence, and even eliminates the disease in a closed system; it could prevent its emergence in new locations, like Oregon.^{lxxv} Moreover, Wild et al. (2011) state that the loss of large carnivores, in combination with human-assisted movement of infected cervids and land use alterations, over much of their native range has likely contributed to the distribution and prevalence of CWD across much of the U.S.

Conclusion

For all of these reasons, we ask the ODFW to seriously consider the issues we have raised here and address them prior to voting on the Plan. The Plan opens the door to trophy hunting and trapping as well as intense and unnecessary persecution of gray wolves for a minority of stakeholders. While we understand the need to work collaboratively with the large breadth



of groups engaged in wolf conservation and management, ODFW's Plan in its current draft form is not an acceptable approach to managing Oregon's wolves and does not represent the interests of the majority of voters in our state.

Sincerely,

Amanda Wight
Wildlife Protection Manager
The Humane Society of the United States

ⁱ See pages 31-31 https://www.dfw.state.or.us/Wolves/docs/oregon_wolf_program/Draft_Wolf_Plan_4-12-19.pdf

ⁱⁱ Jacinthe Gosselin et al., "The Relative Importance of Direct and Indirect Effects of Hunting Mortality on the Population Dynamics of Brown Bears," *Proceedings of the Royal Society B* 282 (2015).

ⁱⁱⁱ A. D. Wallach et al., "What Is an Apex Predator?," *Oikos* 124, no. 11 (2015); Scott Creel and Jay Rotella, "Meta-Analysis of Relationships between Human Offtake, Total Mortality and Population Dynamics of Gray Wolves (*Canis Lupus*)," *PLoS ONE* 5, no. 9 (2010); D. E. Ausband et al., "Recruitment in a Social Carnivore before and after Harvest," *Animal Conservation* 18, no. 5 (2015); Bridget L. Borg et al., "Implications of Harvest on the Boundaries of Protected Areas for Large Carnivore Viewing Opportunities," *PLOS ONE* 11, no. 4 (2016); J. H. Schmidt, J. W. Burch, and M. C. MacCluskie, "Effects of Control on the Dynamics of an Adjacent Protected Wolf Population in Interior Alaska," *Wildlife Monographs* 198, no. 1 (2017); Douglas W. Smith et al., "Survival of Colonizing Wolves in the Northern Rocky Mountains of the United States, 1982-2004," *The Journal of Wildlife Management* 74, no. 4 (2010).

^{iv} "Heavily Hunted Wolves Have Higher Stress and Reproductive Steroids Than Wolves with Lower Hunting Pressure," *Functional Ecology* (2014), p. 2

^v Creel and Rotella, "Meta-Analysis of Relationships between Human Offtake, Total Mortality and Population Dynamics of Gray Wolves (*Canis Lupus*)."; Jay S. Mallonee, "Hunting Wolves in Montana - Where Is the Data?," *Nature and Science* 9, no. 9 (2011).

^{vi} Bryan et al., "Heavily Hunted Wolves Have Higher Stress and Reproductive Steroids Than Wolves with Lower Hunting Pressure."

^{vii} Brainerd et al 2008.

^{viii} A. Zedrosser et al., "Determinants of Lifetime Reproduction in Female Brown Bears: Early Body Mass, Longevity, and Hunting Regulations," *Ecology* 94, no. 1 (2013).

^{ix} Christopher Collins and Roland Kays, "Causes of Mortality in North American Populations of Large- and Medium-Sized Mammals," *Animal Conservation* 14, no. 5 (2011); D. W. Coltman et al., "Undesirable Evolutionary Consequences of Trophy Hunting," *Nature* 426, no. 6967 (2003).

^x Collins and Kays, "Causes of Mortality in North American Populations of Large- and Medium-Sized Mammals."

^{xi} Fred W Allendorf et al., "Genetic Effects of Harvest on Wild Animal Populations," *Trends in ecology & evolution* 23, no. 6 (2008).

^{xii} F. Benson John et al., "Interactions between Demography, Genetics, and Landscape Connectivity Increase Extinction Probability for a Small Population of Large Carnivores in a Major Metropolitan Area," *Proceedings of the Royal Society B: Biological Sciences* 283, no. 1837 (2016); Richard Frankham, Corey JA Bradshaw, and Barry W Brook, "Genetics in Conservation Management: Revised Recommendations for the 50/500 Rules, Red List Criteria and Population Viability Analyses," *Biological Conservation* 170 (2014); Ian G Jamieson and Fred W Allendorf, "How Does the 50/500 Rule Apply to Mvps?," *Trends in ecology & evolution* 27, no. 10 (2012); Jennifer C Pierson et al., "Incorporating Evolutionary Processes into Population Viability Models," *Conservation Biology* 29, no. 3 (2015).

^{xiii} Allendorf et al., "Genetic Effects of Harvest on Wild Animal Populations."

^{xiv} Ibid.

^{xv} Mason-Dixon Polling and Strategy. 2018. Oregon Poll. Retrieved from:
http://www.oregonwild.org/sites/default/files/or_wild_results_with_charts_2018_poll.pdf.

^{xvi} Mason-Dixon Polling and Research. (2015). Retrieved from: http://www.oregonwild.org/sites/default/files/ow_wolf_poll.pdf.

^{xvii} Pacific Wolf Coalition/Mason-Dixon Polling and Research. Wolf Management Policies: Oregon Voter Survey. (2016). Retrieved from:
<http://www.pacificwolves.org/wp-content/uploads/2016/10/OREGON-WOLVES-SURVEY-9-2016-PWC.pdf>.

^{xviii} Kelly A. George et al., "Changes in Attitudes toward Animals in the United States from 1978 to 2014," *Biological Conservation* 201 (2016); Robert Holsman, Natalie Kaner, and Jordan Petchenik, "Public Attitudes Towards Wolves and Wolf Management in Wisconsin," *Wisconsin Department of Natural Resources Bureau of Science Services* <https://dnr.wi.gov/topic/WildlifeHabitat/wolf/documents/WolfAttitudeSurveyReportDRAFT.pdf> (2014); Michele L. Lute et al., "Toward Improving the Effectiveness of Wolf Management Approached in Michigan: Insight from a 2010 Statewide Survey," *Michigan State University and Michigan Technological University* (2012); Borg et al., "Implications of Harvest on the Boundaries of Protected Areas for Large Carnivore Viewing Opportunities," Mason-Dixon Polling & Research Inc., "June 2013 Hsus Wisconsin Poll," (2013); Remington Research Group, "Alaskan Voters Strongly Oppose Cruel Methods of Killing Iconic Wildlife on National Preserves in Alaska," http://www.humane-society.org/news/press_releases/2018/06/the-humane-society-of-the.html (2018); The Economist, "Yougov Poll," <https://d25d2506sfb94s.cloudfront.net/cumulus/uploads/document/y3tke5cxwy/econTabReport.pdf>; George et al., "Changes in Attitudes toward Animals in the United States from 1978 to 2014,"; Holsman, Kaner, and Petchenik, "Public Attitudes Towards Wolves and Wolf Management in Wisconsin,"; Lute et al., "Toward Improving the Effectiveness of Wolf Management Approached in Michigan: Insight from a 2010 Statewide Survey,"; Borg et al., "Implications of Harvest on the Boundaries of Protected Areas for Large Carnivore Viewing Opportunities,"; Mason-Dixon Polling & Research Inc., "June 2013 Hsus Wisconsin Poll,"; Remington Research Group, "Alaskan Voters Strongly Oppose Cruel Methods of Killing Iconic Wildlife on National Preserves in Alaska,"; The Economist, "Yougov Poll."

^{xix} M. J. Manfredo et al., "America's Wildlife Values: The Social Context of Wildlife Management in the U.S.," ed. National Report from the research project entitled "America's Wildlife Values" (Fort Collins, Colorado: Colorado State University, Department of Natural Resources, 2018).

^{xx} B. J. Bergstrom, "Carnivore Conservation: Shifting the Paradigm from Control to Coexistence," *Journal of Mammalogy* 98, no. 1 (2017); S. A. Stone et al., "Adaptive Use of Nonlethal Strategies for Minimizing Wolf-Sheep Conflict in Idaho," *ibid.*; K. Slagle et al., "Attitudes toward Predator Control in the United States: 1995 and 2014," *ibid.*; Robert J. Lennox et al., "Evaluating the Efficacy of Predator Removal in a Conflict-Prone World," *Biological Conservation* 224 (2018); Francisco J. Santiago-Avila, Ari M. Cornman, and Adrian Treves, "Killing Wolves to Prevent Predation on Livestock May Protect One Farm but Harm Neighbors," *PLOS ONE* 13, no. 1 (2018); Guillaume Chapron and Adrian Treves, "Blood Does Not Buy Goodwill: Allowing Culling Increases Poaching of a Large Carnivore," *Proceedings of the Royal Society of London B: Biological Sciences* 283, no. 1830 (2016); Adrian Treves, Miha Krofel, and Jeannine McManus, "Predator Control Should Not Be a Shot in the Dark," *Frontiers in Ecology and the Environment* 14, no. 7 (2016).

^{xxi} The Humane Society of the United States, "Government Data Confirm That Wolves Have a Negligible Effect on U.S. Cattle and Sheep Industries," https://www.humane-society.org/sites/default/files/docs/HSUS-Wolf-Livestock-6.Mar_.19Final.pdf (2019).

^{xxii} Ibid.

^{xxiii} See Fig. 38 in: The Humane Society of the United States, "Government Data Confirm That Cougars Have a Negligible Effect on U.S. Cattle and Sheep Industries," https://www.humane-society.org/sites/default/files/docs/Cougar-Livestock-6.Mar_.19-Final.pdf (2019).

^{xxiv} See: Fig. 39.Ibid.

^{xxv} See page 3: <https://dfw.state.or.us/Wolves/docs/WPSR/WPSR%20Oct%209%20Meeting%20Topics%20Background.pdf>.

^{xxvi} U.S. Department of Agriculture-APHIS. (2017). "Death Loss in U.S. Cattle and Calves Due to Predator and Nonpredator Causes, 2015," https://www.aphis.usda.gov/animal_health/nahms/general/downloads/cattle_calves_deathloss_2015.pdf. U.S. Department of Agriculture-

APHIS. (2015). "Sheep and Lamb Predator and Non-Predator Death Loss in the United States," https://www.aphis.usda.gov/animal_health/nahms/sheep/downloads/sheepdeath/SheepDeathLoss2015.pdf.

xxvii Ibid.

xxviii Northern Rocky Mountain Wolf Recovery: Program 2015 Interagency Annual Report, by U.S. Fish and Wildlife Service et. al. (https://www.fws.gov/mountain-prairie/es/species/mammals/wolf/2016/FINAL_NRM%20summary%20-%202015.pdf, 2016).

xxix Oregon Department of Fish and Wildlife. 2019. Oregon Wolf Conservation and Management 2018 Annual Report. Oregon Department of Fish and Wildlife, 4034 Fairview Industrial Drive SE. Salem, OR, 97302.

xxx Creel, S., & Rotella, J. (2010). Meta-analysis of relationships between human offtake, total mortality and population dynamics of gray wolves (*Canis lupus*). *PLOS ONE*, 5(9). Creel, S., Becker, M., Christianson, D., Droge, E., Hammerschlag, N., Hayward, M. W., ...Schuette, P. (2015). Questionable policy for large carnivore hunting. *Science*, 350(6267), 1473-75. Haber, G. C. (1996). Biological, conservation, and ethical implications of exploiting and controlling wolves. *Conservation Biology*, 10(4), 1068-81. Santiago-Avila, F. J., Cornman, A. M., & Treves, A. (2018). Killing wolves to prevent predation on livestock may protect one farm but harm neighbors. *PLOS ONE* 13(1), e0189729.

xxxi Bryan, H. M., Smits, J. E. G., Koren, L., Paquet, P. C., Wynne-Edwards, K. E., & Musiani, M. (2014). Heavily hunted wolves have higher stress and reproductive steroids than wolves with lower hunting pressure. *Functional Ecology*, 1-10.

xxxii B. J. Bergstrom, "Carnivore Conservation: Shifting the Paradigm from Control to Coexistence," *Journal of Mammalogy* 98, no. 1 (Feb 2017), <http://dx.doi.org/10.1093/jmammal/gyw185>.

xxxiii See: e.g., Bradley et al., 2015; Wielgus & Peebles, 2014

xxxiv Santiago-Avila, et al., 2018.

xxxv DeCesare, N. J., Wilson, S. M., Bradley, E. H., Gude, J. A., Inman, R. M., Lance, N. J., ...Smucker, T. D. (2018). Wolf-livestock conflict and the effects of wolf management. *The Journal of Wildlife Management*, 82(4), 711-722. Treves, A., M. Krofel, and J. McManus. 2016. Predator control should not be a shot in the dark. *Frontiers in Ecology and the Environment* 14:380-388.

xxxvi William F. Andelt, "Carnivores," in *Rangeland Wildlife*, ed. P. R. Krausman (Denver: Society for Range Management, 1996); A. Treves and K. U. Karanth, "Human-Carnivore Conflict and Perspectives on Carnivore Management Worldwide," *Conservation Biology* 17, no. 6 (2003); A. Eklund et al., "Limited Evidence on the Effectiveness of Interventions to Reduce Livestock Predation by Large Carnivores," *Scientific Reports* 7 (2017); Stone et al., "Adaptive Use of Nonlethal Strategies for Minimizing Wolf-Sheep Conflict in Idaho,"; M. Parks and T. Messmer, "Participant Perceptions of Range Rider Programs Operating to Mitigate Wolf-Livestock Conflicts in the Western United States," *Wildlife Society Bulletin* 40, no. 3 (2016).

xxxvii S. A. Stone et al., "Adaptive Use of Nonlethal Strategies for Minimizing Wolf-Sheep Conflict in Idaho," *Journal of Mammalogy* 98, no. 1 (Feb 2017), <http://dx.doi.org/10.1093/jmammal/gyw188>

xxxviii See e.g.: Eklund, A., Lopez-Bao, J. V., Tourani, M., Chapron, G., & Frank, J. (2017). Limited evidence on the effectiveness of interventions to reduce livestock predation by large carnivores. *Scientific Reports*, 7. Lennox, R. J., Gallagher, A. J., Ritchie, E. G., & Cooke, S. J. (2018). Evaluating the efficacy of predator removal in a conflict-prone world. *Biological Conservation*, 224, 277-89. Treves, A., M. Krofel, and J. McManus. 2016. Predator control should not be a shot in the dark. *Frontiers in Ecology and the Environment* 14:380-388.

xxxix Andelt 1996; Baker, P. J., B. Luigi, S. Harris, G. Saunders, and P. C. L. White. 2008. Terrestrial carnivores and human food production: impact and management. *Mammal Review* 38:123-166; Eklund et al., 2017; Morehouse, A., and M. Boyce. 2011. From venison to beef: seasonal changes in wolf diet composition in a livestock grazing environment. *Frontiers in Ecology and the Environment* 9:440-445; Parks & Messmer, 2016; Shivik, J. A., A. Treves, and P. Callahan. 2003. Nonlethal techniques for managing predation: Primary and secondary repellents. *Conservation Biology* 17:1531-1537; Stone et al., 2017; Treves, A., and K. U. Karanth. 2003b. Special section: Human-carnivore conflict: Local solutions with global applications. *Conservation Biology* 17:1489-1490; Treves, A., K. A. Martin, A. Wydeven, and J.

Wiedenhoeft. 2011. Forecasting Environmental Hazards and the Application of Risk Maps to Predator Attacks on Livestock. *BioScience* 61:451-458.

^{xi} Boertje, R. D., M. A. Keech, and T. F. Paragi. 2010. Science and Values Influencing Predator Control for Alaska Moose Management. *Journal of Wildlife Management* 74:917-928. Forrester, T. D., and H. U. Wittmer. 2013. A review of the population dynamics of mule deer and black-tailed deer *Odocoileus hemionus* in North America. *Mammal Review* 43:292-308. Monteith, K. L., V. C. Bleich, T. R. Stephenson, B. M. Pierce, M. M. Conner, J. G. Kie, and R. T. Bowyer. 2014. Life-history characteristics of mule deer: Effects of nutrition in a variable environment. *Wildlife Monographs* 186:1-62. Pierce, B. M., V. C. Bleich, K. L. Monteith, and R. T. Bowyer. 2012. Top-down versus bottom-up forcing: evidence from mountain lions and mule deer. *Journal of Mammalogy* 93:977-988. Prugh, L. R., and S. M. Arthur. 2015. Optimal predator management for mountain sheep conservation depends on the strength of mesopredator release. *Oikos* 124:1241-1250. Vucetich, J. A., D. W. Smith, and D. R. Stahler. 2005. Influence of harvest, climate and wolf predation on Yellowstone elk, 1961-2004. *Oikos* 111:259-270. Wright, G. J., R. O. Peterson, D. W. Smith, and T. O. Lemke. 2006. Selection of northern Yellowstone elk by gray wolves and hunters. *Journal of Wildlife Management* 70:1070-1078.

^{xlii} L. R. Prugh and S. M. Arthur, "Optimal Predator Management for Mountain Sheep Conservation Depends on the Strength of Mesopredator Release," *Oikos* 124, no. 9 (2015).

^{xliii} W. J. Ripple et al., "Trophic Cascades from Wolves to Grizzly Bears in Yellowstone," *Journal of Animal Ecology* 83, no. 1 (2014); Wallach et al., "What Is an Apex Predator?," K. R. Crooks and M. E. Soule, "Mesopredator Release and Avifaunal Extinctions in a Fragmented System," *Nature* 400, no. 6744 (1999); K.M. Berger, EM Gese, and Joel Berger, "Indirect Effects and Traditional Trophic Cascades: A Test Involving Wolves, Coyotes, and Pronghorn," *Ecology* 89, no. 3 (2008).

^{xliiii} Prugh and Arthur, "Optimal Predator Management for Mountain Sheep Conservation Depends on the Strength of Mesopredator Release."; Berger, Gese, and Berger, "Indirect Effects and Traditional Trophic Cascades: A Test Involving Wolves, Coyotes, and Pronghorn."

^{xliv} Mitchell et al.

^{lv} Ibid.

^{lvi} Ibid., 26.

^{lvii} See e.g.: Mech, L. D. 2007. Femur-marrow fat of white-tailed deer fawns killed by wolves. *Journal of Wildlife Management* 71:920-923.

^{lviii} Mitchell, C. D., R. Chaney, K. Aho, J. G. Kie, and R. T. Bowyer. 2015. Population density of Dall's sheep in Alaska: effects of predator harvest? *Mammal Research* 60:21-28. Wright et al., 2006.

^{lix} Wright et al., 2006.

ⁱ Callan, R., N. P. Nibbelink, T. P. Rooney, J. E. Wiedenhoeft, and A. P. Wydeven. 2013. Recolonizing wolves trigger a trophic cascade in Wisconsin (USA). *Journal of Ecology* 101:837-845. Leopold, A. S., S. A. Cain, I. N. Gabrielson, C. M. Cottam, and T. L. Kimball. 1964. Leopold Report: Predator and Rodent Control in the United States: Report submitted to Department of Interior. Logan, K. A., and L. L. Sweanor. 2001. Desert puma: evolutionary ecology and conservation of an enduring carnivore. Island Press, Washington, DC. Mitchell et al., 2015. Murie, A. 1940. Ecology of the Coyote in the Yellowstone. *in* U. S. D. o. Interior, editor. Fauna of the National Parks of the United States. U.S. Government Printing Office. Peckarsky, B. L., P. A. Abrams, D. I. Bolnick, L. M. Dill, J. H. Grabowski, B. Luttbeg, J. L. Orrock, S. D. Peacor, E. L. Preisser, O. J. Schmitz, and G. C. Trussell. 2008. Revisiting the Classics: Considering Nonconsumptive Effects in Textbook Examples of Predator-Prey Reactions. *Ecological Society of America* 89:2416-2425.

ⁱⁱ Krumm, C. E., M. M. Conner, N. T. Hobbs, D. O. Hunter, and M. W. Miller. 2009. Mountain lions prey selectively on prion-infected mule deer. *Biology Letters* 6:209-211. Mech, 2007. Monteith et al., 2014

ⁱⁱⁱ Bishop, C. J., G. C. White, D. J. Freddy, B. E. Watkins, and T. R. Stephenson. 2009. Effect of Enhanced Nutrition on Mule Deer Population Rate of Change. *Wildlife Monographs*:1-28. Hurley, M. A., J. W. Unsworth, P. Zager, M. Hebblewhite, E. O. Garton, D. M. Montgomery, J. R. Skalski, and C. L. Maycock. 2011. Demographic Response of Mule Deer to Experimental Reduction of Coyotes and Mountain Lions in



**THE HUMANE SOCIETY
OF THE UNITED STATES**

Southeastern Idaho. Wildlife Monographs:1-33. Mitchell et al., 2015. Mosnier, A., D. Boisjoly, R. Courtois, and J. P. Ouellet. 2008. Extensive predator space use can limit the efficacy of a control program. *Journal of Wildlife Management* 72:483-491.

^{liii} Braczkowski, A. R., G. A. Balme, A. Dickman, D. W. Macdonald, J. Fattebert, T. Dickerson, P. Johnson, and L. Hunter. 2015. Who Bites the Bullet First? The Susceptibility of Leopards *Panthera pardus* to Trophy Hunting. *Plos One* 10. Darimont, C. T., S. M. Carlson, M. T. Kinnison, P. C. Paquet, T. E. Reimchen, and C. C. Wilmsers. 2009. Human predators outpace other agents of trait change in the wild. *Proceedings of the National Academy of Sciences of the United States of America* 106:952-954. Palazy, L., C. Bonenfant, J. M. Gaillard, and F. Courchamp. 2012. Rarity, trophy hunting and ungulates. *Animal Conservation* 15:4-11. Ripple, W. J., G. Chapron, J. V. López-Bao, S. M. Durant, D. W. Macdonald, P. A. Lindsey,... and L. Zhang. 2016. Saving the World's Terrestrial Megafauna. *BioScience*.

^{liv} K. S. McKelvey and P. C. Buotte, "Climate Change and Wildlife in the Northern Rockies Region," in *Climate Change Vulnerability and Adaptation in the Northern Rocky Mountains*, ed. Jessica E. Halofsky, et al. (Fort Collins, CO: U.S. Department of Agriculture, Forest Service, Rocky Mountain 2018).

^{lv} Sarah A. Hendricks et al., "Natural Re-Colonization and Admixture of Wolves (*Canis Lupus*) in the Us Pacific Northwest: Challenges for the Protection and Management of Rare and Endangered Taxa," *Nature Heredity* 122 (2019).

^{lvi} McKelvey and Buotte, "Climate Change and Wildlife in the Northern Rockies Region."

^{lvii} Ibid.

^{lviii} David L Mech, *Is Climate Change Affecting Wolves in the High Arctic?*, vol. 67 (2004).

^{lix} Ibid.

^{lx} Alex O. Sutton, Dan Strickland, and D. Ryan %J Climate Change Responses Norris, "Food Storage in a Changing World: Implications of Climate Change for Food-Caching Species," *Climate Change Responses* 3, no. 1 (2016).

^{lxi} Amanda Droghini and Stan Boutin, "Snow Conditions Influence Grey Wolf (*Canis Lupus*) Travel Paths: The Effect of Human-Created Linear Features," *Canadian Journal of Zoology* 96, no. 1 (2017).

^{lxii} Ibid.

^{lxiii} Ibid., p. 40.

^{lxiv} Ibid.

^{lxv} Ibid.

^{lxvi} Ibid.

^{lxvii} Ibid.

^{lxviii} See: https://www.dfw.state.or.us/wildlife/health_program/chronic_wasting/

^{lix} N. Thompson Hobbs, "A Model Analysis of Effects of Wolf Predation on Prevalence of Chronic Wasting Disease in Elk Populations of Rocky Mountain National Park " http://files.cfc.umt.edu/cesu/NPS/CSU/2005/Hobbs_wolf%20cwg%20report.pdf (2006); Margaret A. Wild et al., "The Role of Predation in Disease Control: A Comparison of Selective and Nonselective Removal Removal on Prion Disease Dynamics in Deer," *Journal of Wildlife Diseases* 47, no. 1 (2011).



**THE HUMANE SOCIETY
OF THE UNITED STATES**

^{lxx} Samuel E. Saunders, Shannon L. Bartelt-Hunt, and Jason C. Bartz, "Occurrence, Transmission, and Zoonotic Potential of Chronic Wasting Disease," *Emerging infectious diseases* 18, no. 3 (2012).

^{lxi} Wild et al., "The Role of Predation in Disease Control: A Comparison of Selective and Nonselective Removal on Prion Disease Dynamics in Deer."

^{lxii} C. E. Krumm et al., "Mountain Lions Prey Selectively on Prion-Infected Mule Deer," *Biology Letters* 6, no. 2 (2009).

^{lxiii} Ibid.

^{lxiv} Michael W. Miller and Margaret A. Wild, "Epidemiology of Chronic Wasting Disease in Captive White-Tailed and Mule Deer," 40, no. 2 (2004).

^{lxv} Hobbs, "A Model Analysis of Effects of Wolf Predation on Prevalence of Chronic Wasting Disease in Elk Populations of Rocky Mountain National Park".

Roxann B Borisch

From: Amaroq Weiss <AWeiss@biologicaldiversity.org>
Sent: Thursday, May 23, 2019 5:13 PM
To: odfw.commission@state.or.us
Cc: Michelle Dennehy (Michelle.N.Dennehy@state.or.us)
Subject: Attachments for CBD Comment Ltr on 2019 Draft wolf Plan Revisions

Chair Finely and Members of the Commission,

Please find at this link – which expires on May 30th, the two attachments accompanying the comment letter I just sent to you on behalf of the Center for Biological Diversity.

<https://spaces.hightail.com/receive/bNf2rilQGn>

- The first is a compilation of science papers and a poll we cite to in our letter.
- The second is a compilation of pertinent pages on Controlled Take from the 2005 Plan, the 2010 Plan, the two 2017 Draft Plan proposed revisions, and the new 2019 Draft Plan revisions.

These files were too large to send as attachments, so please use this link to pop open and obtain these files before May 30th.

Thank you,
Amaroq

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

Roxann B Borisch

From: Amaroq Weiss <AWeiss@biologicaldiversity.org>
Sent: Thursday, May 23, 2019 5:02 PM
To: odfw.commission@state.or.us
Cc: Michelle Dennehy (Michelle.N.Dennehy@state.or.us)
Subject: Comment Ltr from Center for Biological Diversity on 2019 Draft Wolf Plan Revisions
Attachments: CBD Comment Ltr for May 23.pdf

Chair Finley and members of the Commission:

Please find attached a comment letter from the Center for Biological Diversity regarding the 2019 Draft Wolf Plan revisions.

I am sending several more separate emails with attached documents pertinent to our letter, so as not to clog your server with too many large files at once.

I will also be sending separately a line-item assessment of the Draft Plan revisions, but cannot complete them by 5:00 p.m. today. I aim to complete them by 6:00 p.m. and send them to you by that time, and hope they can still be considered as having met your requested May 23rd deadline.

Thank you,
Amaroq

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



May 23, 2019

Comments on the proposed 2019 Draft Oregon Wolf Plan Revisions

To the Commission:

These comments on the draft proposed 2019 Oregon Wolf Management and Conservation Plan revisions (“2019 Draft Plan”) are submitted on behalf of the Center for Biological Diversity and our nearly 30,000 Oregon members and supporters.

In this letter, we address two key components of the 2019 Draft Plan revisions which are of greatest concern to our organization and the members and supporters we represent: The definition of chronic depredation, and controlled take.

In addition to this letter, we submit a line-item assessment of multiple parts of the 2019 Draft Plan to address information gaps, text changes, confusing terms or descriptions and to provide citations to additional published peer-reviewed literature and other resources the 2019 Draft Plan should incorporate.

DEFINITION OF CHRONIC DEPREDAATION

Oregon’ Wolf Plan seeks to adaptively manage wolves across a spectrum of three phases, identified as Phase I, II and III. Thresholds met by numbers of breeding pairs are what drive wolves from one phase to the next.

It has long been the conservation community’s position that Phase I requirements before a wolf kill order can be issued, as adopted in 2013, should be the standard across all three phases. Our view has been met by an opposite force – the livestock and sports-hunting industries’ push to remove all impediments to killing wolves.

Attempts by the Oregon Department of Fish and Wildlife (ODFW) to achieve a compromise on this issue --and specifically on the definition of what constitutes chronic depredation / what threshold must be met in Phases II and III before ODFW can authorize that wolves be killed – have failed.

The proposal ODFW now makes in this 2019 Draft Plan to define chronic depredation in Phase II and III as “2 depredations in a 9-month period” is a threshold that the livestock industry agrees it could accept, but which no conservation group has agreed to or finds acceptable.

We believe a resolution can be reached which is better grounded in real life practice/data from wolf management in Oregon by ODFW, the ever-increasing science concluding that nonlethal methods are more effective than killing wolves to resolve conflicts, and the type of social compromise ODFW hopes to obtain.

The Wolf Plan has a complex history -- with its adoption in 2005, a mandated 5-year update in 2010, a lawsuit and settlement related to the Plan’s allowance of killing wolves for chronic livestock predations, state-delisting of wolves in 2015 (over which a lawsuit is still pending), and a four-year delay in the process of completing the next 5-year Plan update which should have occurred in 2015. Recognizing that there are two newly-appointed commissioners now reading these comment letters and who will vote on the proposed updates from ODFW, we first summarize here the background for how chronic depredation has been defined in the past and presently in the Wolf Plan and why ODFW’s proposed definition is unacceptable to the conservation community:

When the original drafters of the 2005 Wolf Plan (of which I was one, as a stakeholder representative appointed by the Commission to represent “wolf advocacy organizations”) crafted the Plan’s phased management approach, in each phase there were slightly different thresholds for a number of distinct management actions. *The one management action whose threshold remained the same across all three phases was the definition of chronic depredation.* The definition agreed to at the time, due to social compromises made in the stakeholder group – not based on any science nor even any clear discussion of what the word “chronic” means and implies -- was 2 depredations without any prescribed time limit. Clearly 2 predations is not chronic, whether in an unlimited period of time or within a short time span. However, we did understand and agree that the term chronic should mean the same thing in all three Phases, no matter how many wolves, packs or breeding pairs exist at the time. *While it is the number of breeding pairs in the state which move wolf management from Phase I to II to III, it is the circumstances of the predation events themselves which make them chronic, not how many wolves are in the state at the time the predation events took place.*

When, in 2010, while wolves were still in Phase I, ODFW did not abide by the Plan’s requirements to document nonlethal measures were used before killing wolves. The Center for Biological Diversity, Cascadia Wildlands and Oregon Wild sued ODFW when we determined the killing of wolves was violating Oregon’s state endangered species act. We also obtained an injunction prohibiting the further killing of wolves while the case was pending. The Oregon Cattlemen’s Association obtained intervener status to join ODFW as a co-defendant; thus lawsuit settlement talks involved the conservation groups, ODFW and the livestock industry. From those settlement discussions, the thresholds and definition for chronic depredation in Phase I was agreed to by the parties as four depredations within a six month period, plus a host of qualifying actions required by ODFW and livestock operators to ensure nonlethal measures were being used to prevent or halt depredations.

As a result of the mutually-agreed upon settlement, Phase I now had a different definition for chronic depredation than did Phases II and III. Those two phases still had the original crafters' definition – the vaguely worded standard of 2 depredations, with no time-frame sideboards. Discussions of whether or how to change the thresholds for Phases II and III were left for a future date.

While the lawsuit was pending from 2011-2013 and then in the three years following its settlement and before wolves moved into Phase II, no wolves were killed, the use of nonlethal conflict deterrents were required and wolf predations on livestock declined -- despite the fact that during this same time period the wolf population tripled. It was only once wolves moved into the vague realm of Phase II, when requirements for nonlethal were relaxed, that predations on livestock rose.

That future date to decide on a new, better definition for chronic depredation in Phases II and III is now upon us, and determining what that definition will be is a significant issue for this 2019 update of the Wolf Plan.

ODFW is now proposing a definition for chronic depredation in Phases II and III of 2 depredations within 9 months. While the imposition of a time limit is an improvement over the current definition which has no time sidebars, 2 depredations can by no stretch of the imagination be termed “chronic”, as was noted by Commissioner Wolley during the May 17, 2019 Commission meeting.

During the recent stakeholder negotiations in 2018, the livestock industry proposed 1 predation in 12 months. Conservation groups proposed a slight drop from the Phase I requirements down to 3 predations in 6 months. The livestock industry countered that they could probably live with 2 predations in 9 months. The conservation groups countered that we could probably live with 3 predations in 6 or 9 months.

From this discussion, the opportunity for a compromise was clear – a definition of 3 in 9 months. This would have met the conservation groups' willingness to drop from 4 predations to 3; and it would have met the livestock industry's willingness to shorten the time period from 12 months to 9 months. Instead, when there was still one more meeting left of the stakeholders group to try to find that compromise, ODFW announced it planned to propose the option the livestock industry last posed – 2 in 9 months.

During the May 17, 2019 Commission meeting, Commissioner Buckmaster asked ODFW whether the new wording (for chronic depredation) accurately reflected the practice of ODFW, i.e., if ODFW has ever removed wolves immediately under the thresholds of the new wording. ODFW Director Melcher replied that it does not reflect ODFW's actual practice. Buckmaster queried “what would our wording be if our Plan reflected our practice?” Melcher's response -- as well as a statement Melcher had made moments earlier -- indicated that ODFW has never initiated a lethal removal at anything less than 3 in 12 months.

The conservation community has been willing to negotiate while standing as firmly on our principles as we can – our stance is that, based on science and based on the on-the-ground

evidence in Oregon – this Plan, this state, this Commission, this agency, should focus on the use of nonlethal conflict deterrence measures instead of making it easy to kill wolves. We hope the Commission understands that agreement by the conservation community to the killing of any wolves for conflicts with livestock -- when the science shows that simply killing wolves is not effective over the long haul, can have unintended negative repercussions for even more conflicts and negative impacts on the social structure of wolves – is all by itself an enormous compromising of our values and world-view.

A threshold of 2 depredations in 9 months is not chronic, is not based in science, not based on ODFW's actual management practices in Oregon, and is not even based on a social compromise reached between the parties. As Commissioners overseeing and setting policy for how wildlife will be managed in the state, we now look to you to take this history and the discussions that have taken place, and direct ODFW to define chronic depredation in such manner that reflects science, Oregon data, and the social pressures in play.

CONTROLLED TAKE

We oppose the 2019 Draft Plan's inclusion of Controlled Take of wolves, and any hunting or trapping of wolves by the public via special permit authorization, Controlled Hunts or General Seasons. We urge that this section be stricken from the Plan.

State-sanctioned wolf hunting as described in the Plan via Controlled Take, Controlled Hunts or General Season Hunts, fail to address current science and changing social mores.

Science and Wolf Hunting

There is ample science demonstrating that allowing the public to hunt wolves does not improve social tolerance for wolves and can have the opposite effect. (Treves and Chapron 2016; Laaksonen et al. 2018; Epstein 2017; Treves 2009)

There is also ample science concluding that allowing the public to hunt wolves, as ODFW has publicly indicated would be appropriate under the precepts of the North American Model of Wildlife Management ("NAM") is, in fact, entirely flawed. (Nelson et al 2011; Vucetich and Nelson 2014; Vucetich et al. 2017; Artelle et al. 2018.) Since ODFW often says it relies upon the NAM in managing Oregon's wildlife, this is of great concern when it comes to wolves in Oregon. In fact, at the May 17, 2019 Commission meeting, ODFW's director reiterated that in Oregon, under the NAM, public hunters are used to help ODFW address problems and that ODFW uses NAM to look across the spectrum of wildlife species and the agency's mission to maintain those populations for current and future generations, as well as recreational opportunities. Further, during the May 17, 2019 Commission meeting, ODFW Director Melcher also stated that "Wolves are a special status game mammal now; we hope that at some time in the future hunting or controlled take is a legitimate management approach."

There is plenty of science, cited to in the Plan, that wolf populations are self-regulated, or regulated by availability of prey, or a combination of both. There is no need for hunting or trapping of wolves as a wolf population regulatory mechanism.

Entirely missing from the 2019 Draft Plan is any discussion of how an agency, a state or society at large can justify hunting apex predators, including wolves. Scientists globally have noted declining populations of apex predators and called for swift action to prevent their human-caused mortality. (O'Bryan et al. 2018; Ripple et al. 2014.)

Social Mores

A 2016 poll showed that 72 percent of Oregonians oppose wolf hunting.¹ Since no one eats wolves nor needs a wolf fur coat to survive an Oregon winter, those polled also clearly understand that hunting of wolves amounts to trophy hunting and they oppose this as well:

- Statewide, 81.9 percent believe that poaching poses a greater threat to deer and elk populations and to hunting opportunities than do wolves. Rural Oregon polled even higher at 87.9 percent, while Metropolitan Portland polled at 83.1 percent and the Willamette Valley polled at 72.9 percent.
- Statewide, 81.1 percent think that prosecuting poachers would be more effective than hunting wolves, in promoting a healthier deer and elk population and hunting opportunities in Oregon. Rural Oregon polled at 75.9 percent, while Metropolitan Portland polled at 89.1 percent and the Willamette Valley polled at 73.8 percent.
- Statewide, 72.4 oppose trophy hunting of wolves. Rural Oregon polled at 73.8 percent, while Metropolitan Portland polled at 78.3 percent and the Willamette Valley polled at 61 percent.

Alterations Made to the Plan's Provisions Concerning Controlled Take to Avoid Litigation and Science is Shocking

In the 2019 Draft Plan, ODFW has made significant alterations to the thresholds for moving to Controlled Take of Wolves for wolf impacts on wild ungulate populations. As explained by ODFW staffer Kevin Blakely, during the May 17, 2019 Commission meeting, this was done to avoid the potential of litigation regarding lack of science to support killing wolves for ungulate impacts under the original 2005 Plan's threshold.

2005 Plan

The legislation required to designate wolves as a Special Status Game Mammal was proposed by the crafters of the 2005 Plan. This legislation did not get passed by the time of the Wolf Plan's adoption in December 2005. Therefore this section/recommendation was largely removed from the 2005 Wolf Plan and placed at the back of that Plan as Appendix P. *The language regarding*

¹ Oregon Voter Survey – September 2016, Commissioned by the Pacific Wolf Coalition. Conducted by Mason-Dixon Polling.

Controlled Take of wolves for ungulate declines stated that wolves must be “the cause” in order to be subject to controlled take.

2010 Plan/Update

In 2009, the legislation to designate wolves as a Special Status Game Mammal was passed. Therefore when updates were made to the Plan in 2010, that content was removed from Appendix P and placed back into Chapter IV of the Wolf Plan, with some revisions.

The 2010 Plan elaborated on the circumstances when wolves could be killed for impacts on wild ungulates, including even the use of controlled take if elk at artificial feeding stations were affected. This was shocking to see, since it amounts to baiting elk to feeding stations, this artificial concentration of elk serving to bait wolves in, and then killing the wolves for impacting this population. (NOTE: While this language has been deleted from the 2019 Draft Plan, nothing in the draft prohibits wolves from being killed under these circumstances.).

However, *the 2010 Plan at least retained the language of the 2005 version that wolves must be “the cause” of an ungulate decline.*

2017 Draft Plan Revisions

In 2017, ODFW issued two draft versions of Wolf Plan revisions, one in April and a modified version in November. In both versions, ODFW now concocted a completely different threshold for when wolves could be killed via Controlled Take for ungulate population declines:

- The April 2017 version on page 68 states “*if wolves are a significant factor in the population not meeting established ungulate objectives in a WMU.*”
- The November 2017 version on page 31 states “*if wolves are a major cause of the [wild ungulate] population not meeting established ungulate objectives or herd management goals*”. And on page 68, this same November version gives a different standard of “*wolves are a significant factor in the population not meeting established ungulate objectives in a WMU.*”

2019 Draft Plan Revisions

The 2019 Draft Plan revisions, at pages 31-32, states that wolves need only be “*a major factor.*”

Comparing the thresholds stated in the Wolf Plan over time, and now being proposed:

- The 2005 Plan states that wolves had to be “*the cause*” of an ungulate decline.
- The 2017 versions state that wolves had to be “*a significant factor*” or “*a major cause*”.
- The 2019 Draft Plan revisions states that wolves need only be a “*major factor.*”

The bottom line is that from 2017 through 2019, ODFW has made substantial alterations to the threshold for killing wolves for impacts on wild ungulates. The original crafters of the 2005 Plan

had in mind that before wolves could be killed for impacts on ungulates, it must be scientifically demonstrated that wolves were “the cause” for the ungulate population decline.

With a few strokes of its pen, to avoid litigation, and in acknowledgement that it would be very difficult to show scientifically, with statistical significance, that wolves are “the cause” of a localized ungulate population decline, ODFW has decided to make it easier to kill wolves because it won’t need science to justify its decision. ODFW has undone the express intention of the crafters of the 2005 Plan who understood quite clearly that the scientific literature then – and still, now --- concludes that habitat quality and other non-predator-related factors are the chief drivers of ungulate populations.

ODFW Should be the Sole Agent Killing Wolves for Conflicts/Negative Impacts

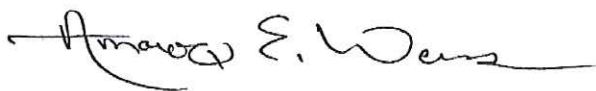
ODFW has expressed no ideas at all of how it will ensure, should members of the public be allowed to kill wolves under Controlled Take, that it will be the “offending wolves” that are targeted and killed. In fact, during the May 17, 2019 Commission meeting, ODFW staffer Derek Broman stated that there could be instances where Controlled Take would be used to effect wolf population reductions, not simply a targeted removal. ODFW also has not provided any assurance that wolves will not be left maimed, after a hunter fails to make a clean kill shot, or that wolf pups won’t be left orphaned because of the time of year that hunting or trapping of wolves for Controlled Take is allowed.

For all of the above reasons, we oppose the use of Controlled Take, Controlled Hunts or General Season Hunting of wolves by members of the public.

In Conclusion

Thank you for taking into consideration our concerns as expressed in this comment letter and in the attached line-item assessment of other specific topics in the 2019 Draft Plan. Please do not hesitate to contact me if you have questions after reviewing these materials.

Sincerely,



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