

**Cascadia Wildlands ~ Center for Biological Diversity ~ Hells Canyon Preservation Council
Northeast Oregon Ecosystems ~ Oregon League of Conservation Voters
Oregon Natural Desert Association ~ Oregon Wild ~ Predator Defense ~ Sierra Club
Western Watersheds Project ~ Wolf Education & Research Center**

June 6, 2011

Mr. Roy Elicker
Director, Oregon Department of Fish & Wildlife
3406 Cherry Avenue N.E
Salem, OR 97303

Dear Director Elicker,

On behalf of our tens of thousands of members all across Oregon, we are writing to you today to express deep concern over recent management activity related to gray wolves (*Canis lupus*) in northeast Oregon. We urgently request that your agency suspend the 24 land owner kill permits that have been issued in the last few weeks, and return to conservation-based management of this species as required by the Oregon Endangered Species Act.

Oregon's fragile wolf population is protected under the state Endangered Species Act in the eastern third of the state and by the federal Endangered Species Act in the western two-thirds. These statutes require management activities that prioritize conservation of the species. ODFW's actions in the past month bring into doubt whether or not the agency is fulfilling its obligation under the law.

On May 5, 2011, just hours after wolf management authority was handed back to the state, ODFW authorized the killing of two gray wolves from the Imnaha Pack, claiming that some members of the pack were responsible for two livestock depredations in the prior week. We find it troubling that it took nearly 3 weeks and repeated requests to receive incomplete information containing facts supporting the decision - including the locations and details of non-lethal efforts that are required under the Oregon Wolf Conservation & Management Plan. Given the significance of the decision to kill nearly 10% of the confirmed population of an endangered species, detailed information should be readily available to agency staff for dissemination to the public in a timely manner.

Subsequent to the lethal removal order, ODFW has issued at least 24 "caught in the act" kill permits to area citizens. Under the Oregon Wolf Conservation and Management Plan, livestock operators must prioritize non-lethal methods for preventing depredations and demonstrate those methods to be ineffective before receiving kill permits. As of the writing of this letter, ODFW has released documentation regarding the non-lethal efforts of only one of the 24 kill permit recipients. ODFW must demonstrate to the Oregon public that the 24 livestock operators have in fact made good-faith efforts to implement non-lethal alternatives, and that ODFW possessed this information at the time the permits were issued.

Furthermore, the 24 issued permits number more than the entire confirmed Oregon wolf population, putting the survival of the species in the state at risk. Given the statutory requirement to conserve gray wolves, the issuance of such a large number of kill permits is extremely troubling.

The lethal control authorization and “caught in the act” kill permits also highlight inconsistencies between your agency’s public statements and actual behavior in regards to wolf management in northeast Oregon. In a May 5, 2011 press release your agency stated:

“ODFW will target sub-adult wolves, not the breeding pair. ODFW will conduct the operation on private land with livestock operations, in an attempt to kill wolves that are showing an interest in livestock.”

This release generated wide-spread news media coverage, and outlined a constrained course of action by ODFW. The 24 kill permits given away following the initial May 5 release were issued to operators on private and public land and allowed permit holders to kill any wolves seen “biting, wounding, or killing livestock.” Given the lack of ODFW resources to monitor and enforce the conditions of these permits, rampant anti-wolf rhetoric, recent poachings, and the fact that dozens of citizens are receiving daily updates on the locations of wolves, there is a likelihood that at least some of these kill permits will be abused.

ODFW announced on May 17 that one sub-adult wolf from the Imnaha Pack had been captured in a leg-hold trap and subsequently killed by agency officials. In correspondence with ODFW staff, we learned that this trap was baited with a cow carcass and urine. On May 18, ODFW announced the confirmation of a third cow depredation by wolves, said to have occurred on the night of May 16. Given the provision in the Oregon Wolf Conservation and Management Plan that requires “no identified circumstance exists that attracts wolf/livestock conflict,” [635-110-0010 (5)(c)(F)] this incident should not be counted as a wolf depredation as ODFW baited wolves back to the area. On May 19, ODFW confirmed that a second sub-adult from the Imnaha Pack was shot by agency officials.

Despite the two lethal control actions, your agency has stated that the 24 kill permits will remain in effect until the end of the grazing season. Under the Oregon Wolf Conservation and Management Plan, ODFW can only issue “caught in the act” kill permits if the agency “confirms that wolves previously have wounded or killed livestock in the area *and efforts to prevent or resolve the problem have been deemed ineffective.*” [635-110-0010 (5)(c)(A), *emphasis added*]. By allowing the 24 “caught in the act” permits to remain active, despite having employed lethal control, ODFW has deemed their own act of lethal control an ineffective tool for managing wolf/livestock conflict. If ODFW wants to uphold its position that lethal control was both a necessary and effective means of addressing wolf/livestock conflicts, then it must rescind the outstanding “caught in the act” kill permits.

Finally, treating every conflict between wolves and the livestock industry as a crisis and devoting nearly all of ODFW’s wolf-related time and resources on a single part of wolf conservation (managing wolf/livestock interactions) continues to be a recurring and serious problem. The agency must not abandon its other requirements under the plan to assuage the concerns of a single interest group. Doing so runs contrary to the Oregon Wolf Conservation and Management Plan and is not a long-term strategy for successful recovery. The wolf plan appropriately limits the discussion of wolf/livestock interactions to 13 of its 105 pages. ODFW should focus more resources on education, outreach, research, and conservation to help Oregonians learn to live with, understand, and appreciate wolves.

Director Elicker, until our concerns are adequately addressed and thorough documentation is provided to substantiate public claims and legal obligations of your agency, we demand that ODFW immediately halt the issuance of any new permits to kill endangered Oregon wolves, and withdraw the 24 kill permits that have already been given away. In taking the significant and severe action to kill two wolves and authorize the potential killing of many more, ODFW should have the justifying documentation at their fingertips when those decisions are made. We expect future decisions of this nature will be accompanied by more timely and detailed information.

Your agency's actions in recent weeks regarding wolf management raise a number of deeply troubling questions. Conservation-minded Oregonians supported a compromised Oregon Wolf Conservation and Management Plan with the understanding that wolf recovery would be the motivating factor guiding agency actions and that the desires of the livestock industry would not outweigh the general public good. As you know, time and time again Oregonians have overwhelmingly supported wolf recovery in our state.

Should ODFW continue to veer away from wolf conservation efforts, public support for the plan and your agency could be seriously undermined.

Very Sincerely,



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