

May 4, 2017

Chair Finley & Commissioners,

On behalf of our 22 organizations representing hundreds of thousands of members and supporters across Oregon, we thank you for the opportunity to provide feedback on the draft revisions to Oregon's Wolf Conservation and Management Plan (the draft Plan). We appreciate the work that has gone into this draft plan and the difficulty in addressing the wide variety of concerns. We support many of the proposed changes in the Plan, and several of our organizations will submit an additional detailed comment letter by the end of May.

Our primary concerns are that the draft Plan:

**Deputizes members of the public to hunt or trap wolves:**

- Wolf hunting and trapping is broadly opposed in Oregon, and science indicates that its allowance may decrease social tolerance for wolves.
- The agency should not delegate wolf-killing authority to the public; it incentivizes conflict, is ripe for abuse and is a "foot in the door" for general wolf hunting and trapping seasons in Oregon.

**Proposes a definition of chronic depredation that will not adequately protect wolves and ignores what has worked to reduce wolf-livestock conflict:**

- Had the proposed definition existed in 2016, it would have allowed 25 of Oregon's 112 known wolves to be killed.
- For the first time, "probable" wolf-caused losses would count toward issuance of a wolf kill order, despite no scientific evidence it will result in fewer conflicts.
- We should carry forward the provisions that have worked to reduce conflict *and* conserve wolves, taking into account seasonality, past depredation patterns, and pack behavior.

**Lacks guidance on requirements for non-lethal conflict deterrent measures:**

- The draft Plan would require documentation of non-lethal methods "reasonable for the situation" with no further explanation. This language is confusing for the public and unenforceable for the agency.
- Conflict deterrence plans coupled with clear, defensible definitions and timely qualification reports give certainty to all stakeholders, reduce conflict and should be continued.

**Permits the killing of wolves for impacts to ungulate populations:**

- Proposed revisions would allow wolves to be killed whenever they are a "significant factor" in ungulate decline, a reduced threshold from the existing plan which requires that wolves be "the cause."
- This will be allowed even at state-sponsored elk feeding sites, which are wolf attractants.
- Wolves should not be blamed for impacts to big game harvest – or decreasing tag sales – in Oregon.

**Allows Wildlife Services to investigate depredation claims:**

- The Department has approached livestock depredations systematically and objectively, using evidence-based methods and science to guide determinations of wolf involvement.
- Wildlife Services -- already a controversial agency with the public -- was previously removed from its investigative role by the Department due to its failure to conduct objective, evidence-based investigations.

- The agency routinely confirmed depredations where ODFW did not find sufficient evidence, and therefore should not be allowed to conduct investigations.

**Fails to address the impacts of poaching or enforcement of Oregon’s wildlife laws:**

- We encourage a greater focus on addressing wolf poaching and the poaching of ungulates that may lead to killing of wolves.

**Includes unclear and ambiguous language:**

- The Plan works best and reduces conflict when all stakeholders have clear expectations of themselves, each other, and the agency.
- All terms, definitions, and requirements should be transparent, defensible, and enforceable.

In response to requests from other stakeholders, we must also address the following:

**We oppose the involvement of local elected officials (including sheriffs) in making consequential depredation decisions:**

- Wildlife is part of the public trust. Consequential decisions about wildlife should be divorced from local politics, pressure and personal relationships.

**We oppose creation of management zones and wolf population caps:**

- Wolves are self-regulating. Killing wolves to maintain arbitrary population caps will increase conflict, and limiting wolf distribution to management zones can jeopardize recovery efforts.
- We object to plan language which implies wolf population caps -- and therefore hunting -- are a foregone conclusion in the next plan revision.
- We do not object to the development of a spatial model by itself, but we oppose its intended use for imposing management zones and population caps in the future.

**We oppose broadly sharing collar data for wolves with the general public:**

- Collars are controversial, expensive, and have potential for abuse.
- We do not oppose collaring when used to *prevent* conflict and inform conservation and better understanding of *wolves* and other wildlife.

Our organizations support healthy abundant populations of all native wildlife including wolves. We encourage Oregon to take this opportunity to again set the gold standard for wolf conservation with minimal conflict. To do so, we encourage you to ensure that revisions to the wolf plan are science-based and informed by Oregon’s deeply held conservation values and the lessons we have learned over the last 12 years.

Sincerely,

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