



June 24, 2010

Summary of Oregon Wild's Comments on the 5-year Review of the Oregon Wolf Conservation & Management Plan

Oregon Wild represents over 7,000 members and supporters who share in our 35-year mission to protect and restore Oregon's wildlands, wildlife, and waters as an enduring legacy for future generations. As part of that mission we seek to ensure sustainable populations of all native wildlife including wolves.

Wolves have experienced a violent history that continues into present times. Wolves were extirpated from the state in 1946 and over the last 12 years have begun to make tenuous steps towards recovery. Oregon currently has 14 confirmed wolves and they continue to conjure up strong emotions on both sides. As an endangered native species, management of wolves should focus on science-based management that will lead to a sustainable population.

Anticipating the return of wolves, in 2005 Oregon wisely called together stakeholders to produce a wolf plan to ensure recovery of the species and guide decisions before conflict occurred. The plan was better than those of neighboring states at the time, but represented a social and political compromise more than a science-based plan. Despite our reservations, Oregon Wild and other conservationists have continued to honor the compromise by defending the plan, the process, ODFW, and ODFW personnel. Last year the plan led to the death of two young Oregon wolves.

State wildlife management should be implemented for the benefit of all Oregonians, not just those most proximate to species being managed or reaping financial profit from that management. Some special interests hostile to wolf recovery, wildlife, and government authority have chosen not to be constructive and have actively worked to oppose, undermine, and sabotage, the plan, ODFW, and wolf recovery. As the plan has been implemented this year, ODFW has seemed to bend to these pressures and our comments necessarily reflect our disappointment with the events of the last few months and address both the implementation as well as the plan itself.

Funding: Non-game wildlife programs and the wolf program in particular are woefully underfunded. A bad economy, the potential for an expanding wolf population, and increasing controversy make this problem worse. ODFW must work aggressively and creatively to secure funding for implementation of all aspects of the wolf plan and begin to prioritize endangered species protection and recovery.

Appropriations: Budgeting should prioritize non-lethal control and conflict prevention.

Relocation: Wolf relocation is not a cure-all for wolf conflict and can be inappropriate for many situations. However, in some cases it may be a simpler, cost-effective, and more appropriate tool than other options and wildlife managers should have available to them an exhaustive list of non-lethal options to turn to before resorting to lethal control. Relocation should not be required, but be an available option. As it is, relocation language is so restrictive as to make it of little practical help.



Compensation: As a gesture of good faith and an acknowledgement that wolves have the potential to create limited but real economic hardship on a small number of stakeholders, Oregon Wild supported an appropriate compensation program. We have been frustrated that stubborn special interests with the most to gain from such a program have actively opposed its enactment. We continue to support an appropriate program. However, a flawed compensation program could be more problematic than no program at all by creating incentives for bad animal husbandry that lead to continued conflict and decreased resources. In our attached comments we outline some important components of such a plan.

Animal husbandry: Living near the big wild places of the west means living with wildlife. Exterminating native species is no longer an acceptable way of dealing with potential conflict. Coexisting with predators takes work and requires new techniques for those living near wolves. Programs to educate owners of domestic animals about ways to prevent conflict and deal with it without resorting to bullets need to be funded and implemented across the landscape and be considered a top-tier priority of the wolf conservation plan. Furthermore, efforts required by the agency and citizens are not clearly or appropriately defined.

Public vs. private land: Public lands are to be managed for the public good, not just for those citizens who profit from or live closest to them. With the unlikely exception of an animal behaving aggressively towards humans, the idea of a “problem animal” of any native species on public lands is a false one. Prevention, avoidance, conservation, and non-lethal hazing on public land should take on even greater importance than on private lands – even after a depredation. These differences are not clearly laid out in the plan.

Depredation: The process of investigating depredations has been a source of great conflict in 2010. Wildlife Services (formerly Animal Damage Control) has demonstrated itself to be at best a discredited and unhelpful partner, and at worst willfully negligent in determining depredations. At the moment, as the most credible and unbiased participant, ODFW must remain the final authority on the matter. The wolf plan must standardize and clarify the training of investigators, the process of investigations, and the documentation and publication of all results. Until that is done, unreasonable special interest will continue to use the process to undermine ODFW and sound, science-based wildlife management. Finally, confirmation of depredations must not come at the expense of conflict prevention.

Recovery numbers: In ensuring long term recovery for an endangered species facing vocal and violent opposition, ODFW was wise to set a minimum number of wolves and not a population cap. Still, recovery numbers represent one of the greatest compromises from conservationists. The numbers are far too low to be scientifically defensible and instead represent a social and political compromise. Additionally the process for relisting wolves is frighteningly and fundamentally flawed. Even if wolf numbers precipitously decline due to a return to rampant poaching or mismanagement, there is no mechanism requiring protections be reinstated.

Interagency coordination: Interagency coordination has been the cause of serious problems and needs to be addressed to ensure appropriate management.



Species prioritization: All native wildlife should, at a minimum, be conserved to ensure sustainable populations that do not need continual human interference. Conservation efforts and resources should be directed first and foremost towards those species – like wolves – that are endangered, under threat, at artificially low numbers, or controversial. In some cases the wolf management plan flips this priority on its head and instead prioritizes limited resources towards abundant non-controversial species whose populations may in fact be artificially inflated. Wolves are a complex, wide-ranging species that are a part of the Oregon landscape. Their presence will effect changes in other native species that may be more valued by some stakeholders. However, ecological integrity should take precedence and changes in population of other species should not require lethal control unless 1) a decline occurs in a species such that its existence is threatened across a large area and 2) it can be proven wolves are in fact a primary cause of said decline.

Process: We are generally pleased with the process for review of the wolf plan. The process should be a review that strengthens the wolf plan, and is not a major revision or rewrite. We encourage ODFW to re-engage the original stakeholder committee and fully consider public comments.

Generally:

- ODFW must stand up for science-based management of wolves and actively defend the plan and wolf recovery.
- ODFW must prioritize efforts aimed at prevention of conflict under all circumstances.
- ODFW must be more cautious in sharing information about the precise location of wolves with a public that contains individuals violently opposed to wolf recovery.
- The ability of organizations to participate in management decisions and collaboration should be directly proportional to their credibility on the subject. Those who continue to be uncooperative, knowingly reference bogus science, or demonize wildlife should not be a part of the process.
- The wolf plan must recognize the value of wolves and the equal standing of all reasonable stakeholders based upon their credibility, not upon their zip code, occupation, or recreational interests.
- Wolves have a complex social structure. In attempting to reduce depredations and conflict, lethal take can often be counterproductive. Through all phases of the plan and even after delisting, lethal take should be an option of last resort and precisely focuses on individual wolves causing conflict.
- ODFW must unflinchingly recognize, incorporate, and defend the best available science and vigorously defend it against persistent and purposefully promulgated myths. Not doing so only invites further conflict and jeopardizes wolf recovery.



Parts of the plan that should not be changed include:

- Wildlife Service has demonstrated a total lack of credibility bordering on willful negligence in investigating wolf depredations. At this time, ODFW must continue to be the final decider in determinations.
- Any cost-benefit analysis should be just that, and consider benefits of the species
- ODFW must not cap wolf numbers or include wolf exclusion zones
- Non-lethal & preventative measures including public education must be given top priority in implementation of the plan
- Lethal control measures must not take place when unreasonable circumstances exist that invite conflict
- Lethal take by private citizens should only be permitted in cases of demonstrable self-defense or for wolves caught in the act of attacking domestic animals – not testing, scavenging, harassing, chasing, or other suspicious behavior or due to proximity to structures. Management decisions should be left in the hands of wildlife managers and guided by sound science aimed at sustainable recovery.
- Recovery goals must not be reduced or consolidated to a statewide number.
- Adjacency language *must not* be eliminated. Clearly defined and defensible adjustments *may* be appropriate. However, the restrictive language was put in place intentionally and for very good reason. Any changes should include consultation with reasonable stakeholders and must ensure control actions are targeted towards the wolf or wolves responsible for the need for such action.

The elimination of wolves from Oregon is one of our greatest environmental tragedies, and their recovery has the potential to be one of our greatest success stories. Most Oregonians would welcome the sound of a howling wolf as they stoked a campfire during a rafting trip on the Rogue River. Furthermore, we are just now beginning to learn about the critical role wolves and other predators play in maintaining the healthy ecosystems that benefit all Oregonians.

Still, some radical anti-wildlife voices with no interest in meaningful wolf recovery continue to whip up misinformed hysteria that threatens wolf recovery. We hope ODFW will consider our comments, make appropriate changes to the wolf plan, continue to work with reasonable stakeholders, appropriately implement the plan, and work to ensure the recovery of this still very endangered species by following science-based management. Please review our attached comments for full details.

Very Sincerely,

Robert Klavins
Roadless Wildlands, Advocate