



August 1, 2017

The Honorable Kate Brown
Office of the Governor
900 Court Street NE, 160
Salem, OR 97301

Dear Governor Brown,

I am writing to you today to express concern over the Oregon Department of Fish and Wildlife's (ODFW) consideration of a request to kill wolves in the Harl Butte Pack in Northeast Oregon, and the lack of public transparency and clear sideboards regarding wolf management. This situation is causing confusion and conflict among livestock operations, conservationists, and the general public. Your assistance is urgently needed to ensure that as ODFW updates the Oregon Wolf Conservation and Management Plan (Wolf Plan) which is now two years overdue, the agency does not make matters worse by further eliminating sideboards and public accountability.

Last Friday, ODFW updated their wolves and livestock webpage, where they provide the public with basic information on when and where wolf-livestock conflicts occur. According to ODFW, Friday's confirmed depredation on the Harl Butte Pack now brings the total to six, since July of last year and the agency has subsequently received a request from a livestock operator to kill wolves.

However, as stated in the report, most of these incidents occurred on public land and involved livestock that was unattended. Other than intermittent updates to the website about depredation investigations, there has been no communication between ODFW and the public about what, if any, non-lethal tactics have been deployed to deter the Harl Butte Pack from further depredations since the initial incident over a year ago, and what, if any, actions were taken by livestock operators to move calves and cattle away from a conflict area.

Compounding this situation, ODFW appears to be counting incidents that occurred a year ago, before the Harl Butte Pack was a formally recognized pack. In addition, these wolf-livestock conflict incidents are taking place in the same general area where ODFW killed all members of the Imnaha Pack in March of 2016. Given that fact, together with the recurring conflict in the area and the fact that most of these incidents have taken place on public land, it begs the question whether this is a wolf management problem or a livestock management problem.

The insufficient communication and clarity on the part of ODFW underscores the deficiencies with the outdated Wolf Plan guiding management in the state, and why it is critical that the plan be updated in order to ensure transparency and accountability. That the agency is now considering a request to kill some or all of the Harl Butte pack when it has not been able to provide the public with any information regarding non-lethal efforts, and that the request is in the same area where the agency already killed one wolf pack in 2016, serves to further erode public trust in the agency and its ability to protect wolves and other wildlife.

ODFW is currently revising the Wolf Plan, but rather than increasing transparency and accountability the agency seems poised to eliminate what little public accountability currently exists and allow key provisions to expire that demonstrably reduce conflict.

Until the draft Wolf Plan is fixed and transparency is required again, the public will continue to question decisions made by ODFW that could possibly lead to killing wolves. Having defensible and enforceable standards, which include specific sideboards, ensures the public that killing wolves is truly an option of last resort and that minimal measures to prevent conflict have been faithfully applied.

Oregon taxpayers have made a significant investment in not only wolf recovery, but providing tools to help deter conflict between livestock interests and wolves, and compensation for wolf depredations and missing livestock. A recent investigation by Oregon Public Broadcasting into waste and fraud in Oregon's wolf

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compensation and coexistence program makes it all the more imperative that the public be provided with timely and transparent information. The public has a right to assurances that taxpayer funded resources are being used to avoid conflict, and a right to accountability if those resources are being abused. After years of having the most progressive Wolf Plan in the country, the current draft plan is destined to lead to unnecessary conflict and killing.

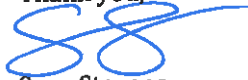
Throughout the review process, Oregon Wild has sent numerous letters to the Fish and Wildlife Commission (Commission) and ODFW staff detailing our concerns and welcoming opportunities to find solutions to these problems. As we've noted in our public testimony and written comment, these concerns include:

- **Enforceability and permissiveness:** The Wolf Plan has worked best and conflict has been minimized when stakeholders and the agency had clear expectations of themselves and one another. The words of the plan should match the intent of the agency and be clear, defensible, transparent, and enforceable. Livestock interests should know what is required before wolves can be killed, and the public should be provided with information that assures them that standards have been met before lethal action is considered.
- **Definition of chronic depredation:** Conflict was at its lowest when Phase 1 definitions were in effect (4 qualifying depredations in 6 months) and meaningful non-lethal conflict deterrence measures were deployed. That is the threshold that should be carried forward to other parts of the plan. This is arguably the single most consequential piece of the Wolf Plan. ODFW is currently proposing to allow 3 wolf-livestock conflict incidents over 12 months to be sufficient for killing wolves.
- **Accurate and defensible depredation investigations:** On several occasions ODFW has talked about established protocols. However, it is not clear what those protocols are. To increase trust and transparency, we encourage the agency to put procedures for training, investigations, data collection, determinations, and public disclosure in writing and share them with the public.
- **Prioritize conservation over killing:** In addition to vague standards and lack of public accountability around wolf-livestock conflicts, ODFW is also proposing to allow sport hunting of Oregon's fragile wolf population under a revised plan. Polling conducted last year found that 70% of Oregonians oppose sport hunting of these animals, and such a move is scientifically indefensible in a state with just 112 known wolves in the wild.

Governor Brown, we urge you to please instruct ODFW and the Commission to rectify these deficiencies in any revision to the Wolf Plan, and to ensure that Oregon has a defensible, transparent and enforceable Wolf Plan including minimum sideboards for when wolves can be killed. Over the years, Oregon Wild has frequently worked with the Governor's Office, the Commission and ODFW to reduce conflicts, and carry out conservation-based management that protects this iconic species while minimizing unnecessary conflict.

Please help us make certain the next iteration of the Wolf Plan is one Oregonians can be proud of, and one that ensures transparency and accountability by ODFW. We look forward to continuing the conversation with you and the agency.

Thank you,



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Oregon Wild

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