



**OREGON CHAPTER  
OF THE WILDLIFE SOCIETY**  
PO Box 2378  
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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 Plans 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