



May 25, 2010

Mr. Ron Anglin  
Wildlife Division Administrator  
Oregon Department of Fish & Wildlife  
Via email: [Ronald.E.Anglin@state.or.us](mailto:Ronald.E.Anglin@state.or.us)

Dear Mr. Anglin,

We are writing to express our deep concern and alarm over ODFW's issuance of take permits to ranchers in Wallowa County. It is our understanding that five permits have been issued as of this time, allowing ranchers to shoot wolves caught in the act of attacking livestock, and that others are being contemplated. The decision to issue these permits concerns us for the following reasons:

1. OAR 635-110-0010(5)(c)(A) requires that before ODFW issues take permits to the public, two prerequisites must be met: confirmed wolf depredation in the area, and "efforts to resolve the problem have been deemed ineffective." While we are aware of many non-lethal actions ODFW has taken regarding wolf depredation in Wallowa County, it is also clear that there are numerous locations where no non-lethal actions have been taken at all. As ODFW is no doubt aware, non-lethal measures such as cleaning up carcass piles are insufficient if not conducted on an area-wide basis. Individual efforts are a good start, but they simply will not be sufficient against such a wide-ranging species as wolves.

In our opinion, it is highly questionable whether the second prerequisite has been met, and if it has not then no take permits can be issued. As examples of failures to meet this prerequisite, we have attached photos of cattle remains in Wallowa County—taken this weekend in the area where there has been wolf activity—that have not been cleaned up even with all the recent wolf activity in the area. ODFW is well aware that these attractants are a major problem when it comes to proactively avoiding wolf-related livestock conflicts. Unless and until proper animal husbandry practices are in place area-wide, efforts to avoid future conflicts will necessarily be ineffective.

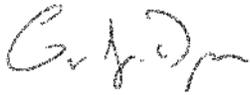
2. The circumstances of the 2<sup>nd</sup> confirmation last week are also suspect. It is our understanding that ODFW's Wolf Coordinator, Russ Morgan, was not involved in the 2<sup>nd</sup> confirmation of a wolf depredation in Wallowa County that was made Friday, May 21<sup>st</sup>. While we realize that one person cannot possibly be involved in every

depredation situation, given the importance of the decision to confirm this 2<sup>nd</sup> depredation (in that it triggered the issuance of take permits) it should not have been made without the involvement of ODFW's wolf expert. At this point, we are requesting that the reports of this 2<sup>nd</sup> confirmed depredation be reviewed by an external wolf expert so there is assured validity to the confirmation. We are also requesting that ODFW establish a clear internal protocol for confirmation of wolf depredations, so that investigations of any depredation that would trigger a subsequent event under the Oregon Wolf Plan or the associated OARs (such as the issuance of take permits) are run through the ODFW's Wolf Coordinator before any public confirmation is made.

3. We are increasingly alarmed at the role Wildlife Services is playing in the determination of wolf depredations. We are not aware of any wolf depredation investigation training that the Wildlife Services agent in Wallowa County has received, and we have recently FOIA'd Wildlife Services to confirm this. Given this lack of training and the fact that this agent has at least two depredation determinations when ODFW has determined there was no basis for such determinations, we have little faith in his ability to make a reasoned and unbiased call on wolf depredations. Likewise, we have little faith in his ability to perform the investigation necessary to determine whether lethal take was warranted should one of the ranchers issued an ODFW permit actually shoot a wolf. We realize you do not exert direct control over Wildlife Services, and we are pressuring them directly as well, but we do want you to be aware that we find their involvement in any depredation call or investigation to be highly suspect. We will be recommending changes to the Oregon Wolf Plan to greatly decrease the level of their involvement in Oregon wolf issues, and in the meantime we strongly recommend that ODFW not rely on any determinations or investigations made by Wildlife Services.
4. We encourage you to act more swiftly when a suspected or real depredation occurs and to act more proactively in disseminating information. The Oregon Cattlemen's Association is commanding the media in NE Oregon, yet many of their statements are incomplete or incorrect. We feel it would behoove ODFW and the few wolves currently in Oregon to have the agency tasked with managing wolves be more present in the local media with an immediate response to these alleged depredations. We understand a desire not to allow others to set the tone of the debate, however there is much misinformation swirling around and ODFW is the best source for correcting this misinformation.

We look forward to receiving the reports surrounding the recent depredations in Wallowa County, and will be reviewing them closely. We would also appreciate the opportunity to discuss these concerns with you directly.

Sincerely Yours,



Greg Dyson  
Executive Director  
Hells Canyon Preservation Council

Steve Pedery  
Conservation Director  
Oregon Wild

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NE Oregon Ecosystems

Emily Platt  
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Brooks Fahy  
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Karen Anspacher-Meyer  
Executive Director  
Green Fire Productions

Kim Crumbo  
Director of Conservation  
Grand Canyon Wildlands Council

Noah Greenwald  
Endangered Species Program Director  
Center for Biological Diversity

Cc:

- Sen. Jackie Dingfelder, Chair, Senate Environment and Natural Resources Committee
- Rep. Brian Clem, Chair, House Agriculture, Natural Resources and Rural Communities Committee
- ODFW: Roy Elicker, Craig Ely, Russ Morgan

Photo from Daggett Road, outside Joseph, Oregon - 22 May 2010



2nd Carcass photographed from Daggett Road, Joseph, Oregon May 22 2010

