



Oregon Natural Desert Association

April 7, 2006

VIA EMAIL

Edward E. Bangs
Western Gray Wolf Recovery Coordinator
U.S. Fish and Wildlife Service
585 Shepard Way
Helena, MT 59601
NRMGrayWolf@fws.gov

RE: RIN number 1018-AU53, Advanced notice of proposed rulemaking to set DPS boundaries and delist gray wolves

Dear Mr. Bangs,

Please accept these comments submitted on behalf of the Oregon Natural Desert Association (ONDA). ONDA is a non-profit public interest organization based in Bend, Oregon and with offices also in Portland, Oregon, whose mission is to protect, defend, and restore forever the health of Oregon's native deserts. The members and staff of ONDA use and enjoy the public lands and wildlife of Oregon and the West, for wildlife watching as well as recreational, scientific, spiritual, educational, aesthetic, and other purposes. ONDA has been actively involved in wolf recovery issues in Oregon and looks forward to the day when wild wolves again roam our state.

In addition to the extensive comments filed in conjunction with Defenders of Wildlife et al, ONDA is providing these additional comments in opposition to locating the DPS boundary line inside of Oregon.

The Oregon Wolf Conservation and Management Plan, written by a diverse Advisory Committee and adopted in December 2005, was the result of a lengthy, collaborative process. The plan is a compromise, but one that recognizes and embraces the fact that wolves will recolonize the state. Drawing the DPS line within Oregon, and any subsequent delisting east of the line, would create havoc for the implementation of this plan.

We are aware that under the DPS policy, political factors cannot be the sole guidepost for DPS delineation. But the current proposed DPS line appears to be arbitrary and not based on the requisite discreteness factor, as it is along a minor 2-lane state highway, which wolves could easily cross. FWS has presented no evidence of any physical, physiological, ecological, or behavioral reasons for using this state highway.

Further, the FWS is using state lines for both the southern and eastern boundaries of its proposed DPS, as well as using the international border for the northern boundary. Clearly FWS does not feel the use of state lines is always inappropriate.

We therefore suggest that FWS also draw the western boundary of the DPS on the Oregon-Idaho state line. In contrast to using the proposed state highway, the state line at least has a biological rationale in that Hells Canyon is a natural barrier (thus addressing the physical and ecological factors in the discreteness factor). It also has the highly beneficial effect of leaving intact Oregon's wolf plan.

In short, if FWS is going to select an arbitrary DPS boundary line, we strongly discourage FWS from including any part of Oregon. Leave Oregon's admirable wolf plan intact.

Please keep us updated on this proposal.

Sincerely,

s/ Kristin Ruether
Oregon Natural Desert Association
917 SW Oak St., Ste. 409
Portland, OR 97205