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Chair Finley, Director Melcher, & Commissioners,

For the record, my name is Stephanie Taylor. I currently live in Portland, OR. However, I was born and raised in SE Idaho in a ranching community. I moved to Oregon 13 years ago seeking education, and am now a permanent Oregon resident. My education is in environmental science and I also study wildlife biology, which raised my interest in wolf recovery.

I reviewed the ODFW Conservation and Management Plan as well as the Biological Status Review. I find your results which conclude 77 wolves as a viable population for recovery- in addition to your recommendation for delisting- as biologically concerning. I am requesting an independent science review from persons outside the agency, using the most recent and best available science. I fear the agency's consideration of a viable population may result from a conflict of interest on the agencies part, and I detect bias towards the reduction of conflict over science for conservation.

In example, on page 19 of the ODFW Wolf Management Plan, under Wolf Distribution it states "the ability to persist will be determined largely by the degree of human tolerance for the species across the state's vast rural landscapes". If this is the case, then a tolerance analysis should be conducted of all Oregon residents across the state's rural populations, and not just those in the livestock industry.

[REDACTED]

[REDACTED]

[REDACTED] On page 10 of the ODFW Management plan, it reads "Before the wolf can be delisted under the Oregon ESA, conservation must be achieved. Successful conservation should lead to delisting and strive to ensure that future "relisting" is unnecessary." 77 wolves with no state protections, how will you ensure that 1) a biologically viable population will be achieved, and 2) that wolves will remain a population that doesn't require relisting?

No biological study would conclude a population of 77 as viable. In fact, numerous studies (Frankham, 1995; Franklin and Frankham, 1998; Reed et al., 2003; Brook et al., 2006; Traill et al. 2007), conclude thousands (not hundreds) of individuals are required in a connected region for a population to have an acceptable probability of riding-out climate change, environmental fluctuation, human conflict, and ensuring the continuation of evolutionary processes. Oregon's landscape consists of barriers to connectivity and dispersal (namely I-84, I-5). These barriers must be factored in to your viability equation.

The ODFW Management plan states that "Translocation of wolves within the state may be used where needed to achieve conservation objectives," and I implore this tactic to be tried and studied before delisting.

Speaking about ODFW Conservation Objectives, on pg. 19 of the Management Plan, it states one objective as: "To permit establishment of a naturally reproducing wolf population in suitable habitat within Oregon, connected to a larger source population of wolves, which allows for expansion into other areas of the state."

Your management plan shows that wolves in Oregon are using less than 12% of the available habitat, and are bound to the NE corner by I-84, but with no proposed resolution from the ODFW.

Another objective is to "Promote social tolerance for wolves by effectively and responsibly addressing conflict with competing human values through the use of management measures consistent with long-term wolf conservation in all phases of wolf management." You have ranchers -who originally agreed to the plan- introducing bills to remove protections for wolves forever. I would argue your conservation objectives have not yet been met.

I urge the ODFW to continue to be a model for native wolf recovery, and to allow this recovery process to occur before reversing your own conservation progress. I also strongly request an independent scientific review of your recommendations.

Thank you for your time. (Sources on back)

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April 24, 2015

Dear Chair Finley and Commissioners,

I am an Oregon resident concerned about wolf recovery and management. I moved to this state 9 years ago because I am in awe of the beautiful landscape, the abundant wildlife, and the community's focus on environmental protection. This issue is important to me, so I took a vacation day from work to travel to Bend to attend the Commission's public hearing on the wolf delisting process. Wolves strike a cultural chord, with a long history of negative public perception. On the other hand, wolves are held as a symbol of wildlife and ecological recovery after more than 150 years of decimated populations due to eradication efforts in Oregon from the 1840s through 1940s.

As a keystone species and important part of Oregon's legacy, I feel very strongly that wolves should continue to be protected in our state. The fragile recovery we have had so far, to a population of 77 wolves, is a step in the right direction for wildlife and ecology in Oregon, but it is not enough to consider them fully recovered. Considering that the vast majority of Oregon's wolves reside in the Northeastern-most corner of the state—less than 12% of potential habitat, unable to significantly spread across the barrier of I-84—at the very least the Commission should implement a plan to facilitate migration of wolves to Western and Southern areas of the state, encouraging a more robust statewide recovery before delisting.

While I know the position that ranchers take against additional wolf recovery, the argument that depredation by wolves causes significant livestock loss does not stand up to the data: 114 livestock confirmed by ODFW as killed by wolves (with compensation to soften financial loss) in nearly 20 years of wolf recovery is insignificant compared to disease, weather, and other factors. According to data from USDA-NAAS (2011), in 2010, wolves were responsible for only 0.2% of unintended cattle losses, while health and disease-related deaths comprised 80% of losses and weather caused 12% of losses. In addition, according to Wielgus and Peebles (2014), increased wolf control resulted in *increased livestock depredation* for cattle and sheep. If the agency moves forward with delisting the gray wolf, I would also like to know how delisting would affect compensation to ranchers for confirmed wolf depredations?

For 13 years, I have built my career in scientific publishing and peer-review management of scientific research journals. I am keenly aware of the importance of critical review by unbiased outside scientists with expertise in the field of a piece of scientific research. Having served on the Council of Science Editors and participated in scientific ethics panels, I firmly believe in the process of independent review to balance and verify scientific research. I am requesting that the Draft Report: Biological Status Review for the Gray Wolf, as well as the Wolf Conservation and Management Plan, be subjected to an independent scientific review to ensure that the Commission is able to make a decision based on sound science held to the highest ethical standards. Independent review is a standard best practice for scientists everywhere; the agency's research should not be an exception.

In closing, I urge the Commission to keep wolf recovery in Oregon on track by continuing meaningful protection of wolf habitat and populations.

Sincerely,

Amanda Ferguson Baisley
1945 NE 113th Ave.
Portland, OR 97220

References:

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<http://usda.mannlib.cornell.edu/usda/current/CattDeath/CattDeath-05-12-2011.pdf>

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doi:10.1371/journal.pone.0113505



April 23, 2015

Chairman Michael Finley
Oregon Fish and Wildlife Commission
4034 Fairview Industrial Drive SE
Salem, OR 97302
E-mail: odfw.commission@coho2.dfw.state.or.us

Reference: Commission Meeting Agenda for April 24, 2015, Exhibit F – Wolf Informational Presentation

Chair Finley and Members of the Commission:

The Rocky Mountain Elk Foundation (RMEF) recommends the Commission direct the Oregon Department of Fish and Wildlife (ODFW) to commence the process for removal of the gray wolf from the list of Oregon Endangered Species.

The Biological Status Review for the Gray Wolf (*Canis lupus*) in Oregon and Evaluation of Criteria to Remove the Gray Wolf from the List of Endangered Species under the Oregon Endangered Species Act (Agenda Exhibit F, Attachment 2) states the wolf population in the eastern management zone has satisfied the delisting criteria specified in the Oregon Wolf Conservation and Management Plan – maintenance of four breeding pairs for three consecutive years, 2012, 2013 and 2014. It documents seven breeding pairs existing in the eastern zone at the end of 2014, and that since coming to Oregon from Idaho in 2008 the wolf population has grown at a mean annual growth rate of 41%. In 2014 ODFW documented a minimum known population of 77 wolves distributed across 15 pairs and packs, with the majority located in NE Oregon in the eastern management zone.

The Biological Status Review addresses each of the delisting criteria of the Oregon Endangered Species Act (ORS 496.176), and demonstrates that each criterion has been satisfied. It states that given continued management, a delisted wolf population would have less than a 1% probability that relisting would be necessary.

The body of evidence in the Biological Status Review clearly shows that ODFW's implementation of the Oregon Wolf Conservation and Management Plan has been exceptionally successful in restoring the gray wolf in the state of Oregon. RMEF believes it is the appropriate time for removal of the gray wolf from the list of Oregon Endangered Species.



ROCKY MOUNTAIN ELK FOUNDATION

Please note, when delisted the management of the gray wolf will not change. It will continue to be managed under the Oregon Wolf Conservation and Management Plan, the same management plan that has guided the return of the wolf to Oregon and to the point of delisting in just six years!

The Rocky Mountain Elk Foundation is a non-profit conservation organization whose mission is to ensure the future of elk, other wildlife, their habitat and our hunting heritage. RMEF also works to open, secure and improve public access for hunting, fishing and other recreation.

Thank you for the opportunity to comment.

Sincerely,

M David Allen
President & CEO



April 24, 2015

**Testimony of Center for Biological Diversity
To the Oregon Fish and Wildlife Commission**

Chair Finley and Commissioners:

My name is Amaroq Weiss, I am the West Coast Wolf Organizer for the Center for Biological Diversity, and my comments are delivered on behalf of our more than 17,000 Oregon members and supporters.

There is simply no science anywhere on earth that would find that a population of 77 animals is biologically recovered. A population of any species that numbers only 77 observed individuals is, in fact, in danger of becoming extinct now.

Population viability analysis is based on survivorship and mortality. To overcome stochastic events, such as disease, there must be sufficient numbers of the species to weather the storm (Shaffer, 1981). For example, in Yellowstone National Park, canine parvovirus and distemper are suspected causes of a 51 percent wolf pup mortality documented in 1999 and 68 percent pup mortality in 2005 (Smith and Almborg, 2007). Were this to occur in Oregon now or in the near future, it would cripple the state's wolf population. For this and other reasons, there is no way that Oregon's tiny wolf population can be considered secure.

Numerous studies have found that minimum viable populations are more in the range of around 4,000 to 5,000 individuals (Reed et al. 2003; Traill et al. 2007). An "effective" population size of 500 breeding individuals is necessary to avoid the effects of genetic inbreeding (Soule and Wilcox, 1980; Frankel and Soule, 1981; Soule, 1986; Franklin and Frankham, 1998). Effective population size is defined as the number of breeding individuals within the total population; to maintain 500 breeding individuals requires a total population of 2,500-5,000 individuals (Frankham, 1995). All of this science, which collectively represents dozens of studies, shows that 77 individuals is far below what is needed to maintain a secure population.

The northern Rocky Mountains states are required to each maintain at least 15 breeding pairs of wolves at all times, or else face federal relisting as endangered. Even this low number is 3 times the four breeding pairs the Department maintains is viable right now. The Mexican gray wolf population in the Southwest currently numbers 109 individuals and is classified as endangered.

To be biologically recovered also requires much greater distribution across suitable habitat than that currently occupied by wolves in Oregon. The Department's modeling studies showed more than 106,000 square kilometers of suitable wolf habitat in the state yet wolves currently inhabit less than 12 percent of that area.


Alaska • Arizona • California • Minnesota • Nevada • New Mexico • New York • Oregon • Vermont • Washington • Washington, DC

Wolf recovery in Oregon is on track for success, precisely because of the protections wolves receive under the state endangered species act and model rules adopted as part of a settlement agreement from a 2011 lawsuit in which our organization was involved. But wolf recovery is still in its infancy and the science tells us there is a ways to go yet.

For the reasons stated above, we recommend that you commission an independent scientific peer review of the Department's analysis and proposal, with the peer review results to be made public before arriving at your own decision. We are aware of several highly-credentialed wolf biologists and habitat modeling experts to recommend as potential peer reviewers and will submit to you a follow-up letter with a list of names and contact information for each one.

We greatly appreciate this opportunity to address you today.

Sincerely,

A handwritten signature in black ink that reads "Amaroq E. Weiss". The signature is written in a cursive style with a long horizontal flourish at the end.

Amaroq Weiss
West Coast Wolf Organizer
Center for Biological Diversity
707-779-9613
aweiss@biologicaldiversity.org

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Chair Finley, Commissioners:

My name is Wally Sykes, from Joseph, Oregon. I'm a member of the Wallowa County Wolf Compensation Committee, Co-Founder of Northeast Oregon Ecosystems and a member of the Pacific Wolf Coalition.

Like many others, I was drawn to Wallowa County by its spectacular landscapes, wilderness and wildlife. For twenty years I've enjoyed the animals surrounding my cabin, including elk, bear, cougar, bobcat, and now wolf.

Many people in the county share my values and appreciation of wolves and, though reluctant to speak publicly, are deeply troubled by the proposal to strip protections from wolves.

Oregon is a state distinguished for its reverence and protection of its natural heritage, including diverse wildlife, and Oregonians will not understand, nor will I, why wolves should be delisted when they are so few and restricted to so small a part of the state.

Oregon's wolf management plan has set a national standard for enlightened, scientifically rational wolf management. The ODFW has been exemplary in its adherence and transparency.

Yet, since the first pups appeared in 2008 only 77 wolves are now confirmed in Oregon's 97,000 square miles, occupying less than 12% of potential habitat. Dispersal has been slow, hampered by Interstates 84 and 5, and this is unlikely to change. Seventy-seven wolves is far below the accepted minimum for long-range genetic viability in any species and the Idaho gene pool is rapidly diminishing. Idaho intends to reduce its wolf numbers to around 150, below genetic minimums, and its population is descended from the even smaller number re-introduced to Central Idaho.

ODFW Staff recommend delisting, stating it will not change wolf management. This then raises the question: why delist at all? Oregon conservationists rightly worry that without listed status, wolves could lose protections during the Wolf Plan Review later this year. For the same reason, Oregonians are concerned that the successful emphasis on nonlethal tools and management may erode.

I will add that I fully endorse the positions expressed by Oregon Wild in its letter to you of April 20, especially the call for an independent review of the final ODFW delisting proposal.

I urge the Commission to maintain Endangered Species status for wolves.

Thank you.

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Cascadia Wildlands

we like it wild.

April 24, 2015

Cascadia Wildlands Testimony
Oregon Department of Fish and Wildlife Commission

Good afternoon Chair Finley and members of the commission,

My name is Nick Cady. I am the Legal Director of Eugene-based Cascadia Wildlands, a regional non-profit conservation organization representing 15,000 members and supporters. Cascadia Wildlands educates, agitates, and inspires a movement to protect and restore Cascadia's wild ecosystems. We envision vast old-growth forests, rivers full of wild salmon, wolves howling in the backcountry, and vibrant communities sustained by the unique landscapes of the Cascadia bioregion.

Cascadia Wildlands was one of the parties that negotiated the Oregon settlement that established a system of rules for wolf management. These rules permit the killing of wolves that chronically depredate on cattle, compensate livestock producers for losses, pay ranchers to implement non-lethal preventative measures, and overall have emphasized the implementation of responsible ranching practices that aim to prevent conflict with wolves. Under this settlement, we have seen wolf populations rise, and conflicts with livestock decrease. We currently have 77 wolves in the state, and this past year we saw the first pack establish itself in the state's western recovery zone. Wolf recovery is moving along.

We are here today considering recommendations by the Department that the Commission delist the gray wolf at this early juncture in wolf recovery. Wolves have just moved out of the first recovery phase in the state's eastern recovery zone, and have according to ODFW populated just 11% of suitable habitat in the state. Cascadia Wildlands believes that an effort to delist the wolf is premature, solely because population numbers are not high enough. Keep in mind the reintroduction of wolves in the northern Rockies started with 66 wolves, we have just 10 more.

We have analyzed ODFW's status review, and believe the agency and its staff have done a tremendous job anticipating and accounting for threats to gray wolves in modeling the future well-being of the species. We have just started looking at the status review, but applying the agency's model, it appears that the species has a 6% chance of dropping below the conservation threshold when factoring in human wolf mortality. I believe this 6% chance is based upon the assumption that 10% of wolves will be killed next year by humans, or about 7 wolves. If the percentage of wolves killed by human increases only slightly to 15%, the probability of conservation failure increases to 53%. This is a difference of 3 to 4 wolves being killed, a very slim margin of error, that would lead to over a 50% chance of Oregon experiencing conservation failure. This wild swing in conservation success probability is largely due to current low numbers of wolves. The model, when applied to wolf populations of over 100 individuals, reduced the probability of failure to under one percent.

This raises significant questions. What is the state going to do to ensure that wolf take levels do not exceed or even approach this threshold? While some level of human mortality is under state control (i.e. lethal control in response to chronic depredation), much of human caused mortality is not (i.e. traffic accidents, poaching, incidental trapping). If the state is going to engage in a rule-making

process, concrete assurances should be built in so that this level of wolf mortality will not be reached or even approached given the very small margin of error. Delisting could be a signal to some that it is open season for wolves, could reduce poaching penalties, and we need to avoid any increases in wolf mortality.

While we know that 77 wolves is a minimum count, we should be using precautionary principles and numbers when gambling on this species future. We have also yet to see the implementation of the relaxed standards for state use of lethal control under Phase II. Cascadia Wildlands would urge the commission to wait a year or two for full delisting, until we can confirm wolf population numbers that would greatly reduce the risk of conservation failure. Organizationally, we could understand if the commission moved to down-list the species and categorize the gray wolf as threatened as opposed to endangered. But complete delisting, and a Departmental gamble on a few wolves killed or not being killed, is not a proper exercise of caution.

The extensive non-lethal efforts and stakeholder outreach by the Department have made Oregon the model for wolf conservation. Delisting will signal a sharp departure away from these efforts that have made wolf recovery a success so far in this state. Wolf recovery is currently working wonderfully. Waiting for a year or two, when the Department can say with total confidence that there is less than a 1% chance of conservation failure with higher margins of error, seems like the smart play. There is an old saying, "If it ain't broke, don't fix it."

Thank you for your time today.

Sincerely,

Nick Cady
Cascadia Wildlands

To the Department of Fish and Wildlife Commissioners:

My name is Joan Beldin and I live in Portland.

I am an environmental educator. One of my teaching endeavors is with Wolfways, a program which teaches children science based wolf education. I felt that the best reminder to you of your responsibility to future generations would be for you to hear directly from our young citizens who will be impacted by your decisions. With that in mind, teachers were invited to give any interested students the opportunity to write letters to you and create drawings that express their feelings and concerns for wolves. You have a packet of over 100 letters and drawings from children living in Portland, Beaverton and Boring. The students attending Springville Elementary School of the Beaverton School District were participating in a two month intensive study of wolves called the Wolf Expedition. These letters are not products of the Wolfways program. Rather, the content in these letters was drawn from many different sources.

I ask that as you look through this packet and read these letters, you do not dismiss or devalue them because they come from children. Rather, they should be given equal consideration as all other letters and testimonies. These are the voices of our future generation and their voices matter. They are reminders to you of your mission "to protect and enhance Oregon's fish and wildlife and their habitats for use and enjoyment by present and future generations."

"I want to protect wolves so when I grow up, I can see them." Cody, 2nd grade

"I know wolves should be protected and I know it is my job to fight an injustice. Please protect our wolves. I want to have them around in my future." Isabella, age 7

"I want to see wolves thriving when I'm in my 90's. So, can you help protect them, please?"
Cara, age 8

I ask that as you read, you listen to the sincere concern, caring and love for our wolves and an understanding of the importance of having wolves in the ecosystem. You will notice in many letters a fear - a fear that wolves will once again become extinct in Oregon. Based on the rampant killing of wolves countrywide, there is good reason for concern. The concept of extinction is not one that was taught by Wolfways.

"If you take wolves off the endangered species list, people may kill them." Liam, age 8

The decision you make will decide the future fate of our wolves. These children need to trust that your decisions will stay true to your mission – that your decisions will ensure the sustainability of all wildlife, without preference to some over others – ie. elk over wolves. If you choose to delist, what laws will be in place to prevent reckless indiscriminate killings and to ensure that wolves will be there for generations to come? We all know that wolves need the

lifeline of the ESA or some law to ensure that a healthy population will persist for generations to come.

Our young people do not understand the complexity of this issue, but they do understand that 77 wolves is not very many. They know that 77 is close to the number of children in only three classrooms, for the entire state. 77 wolves does not make for a recovered species. These letters are pleas to not delist, but to provide continued protection for our wolves.

"We can't just give up and not take care of the wolves... maybe we can take care of them by helping them to be safe" Aide, age 5

"Having wolves in Oregon is a huge honor, because they are very hard to find in the USA".

Chloe, 2nd grade

"I love wolves and I want to help them, but we need your help" Cameron, 2nd grade

May the decision you make and the consequences of that decision be one that you will be proud to tell your grandchildren and your grandchildren's children.

Thank you.

Sincerely,

Joan Beldin

10223 N. Hudson St

Portland, Oregon 97203



April 24, 2015

Oregon Fish and Wildlife Commission
Chair Michael Finley
4034 Fairview Industrial Drive SE
Salem, OR 97302

Dear Chairman Finley and members of the Commission,

My name is Danielle Moser and I am the Pacific Northwest Wolf Organizer for the Endangered Species Coalition. The Endangered Species Coalition is a national network of hundreds of conservation, scientific, education, religious, sporting, outdoor recreation, business and community organizations working to protect our nation's disappearing wildlife and last remaining wild places.

On behalf of the Endangered Species Coalition and our members in Oregon and across the country, we urge you to keep the gray wolf listed on the state Endangered Species Act. Seventy-seven wolves does not indicate a full, sustainable recovery. This recovery effort has had some great successes, as we now have populations in western Oregon, but it is too soon to take wolves off the endangered species list. There is suitable habitat throughout the state where wolves have not yet reestablished populations. Continued state protections are essential to allow existing populations to stabilize and expand into other suitable habitat.

Oregon's Wolf Management and Conservation Plan is seen as a model around the country for ensuring wolf recovery, while minimizing unnecessary conflict. It would be a shame to move backwards on progress that has been achieved and principles that have been agreed upon between the various stakeholders. Nationally, people see Oregon and Oregonians alike as a symbol of conservation-mindedness and a strong natural heritage. It is imperative that the ODFW support proposals that maintain this legacy.

Furthermore, there is no guarantee that the federal endangered listing will remain intact. There are a number of proposals in Congress and with the U.S. Fish and Wildlife Service to permanently delist gray wolves across the country. Since the 2011 wolf delisting, we've seen an uptick in bills and riders that undermine or block protections for wolves, along with other types of proposals to weaken the federal

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TESTIMONY
REGARDING WOLF DELISTING PROCESS
BEFORE THE OREGON FISH AND WILDLIFE COMMISSION
(Bend, Oregon)
(4/24/15)
Ruth Spetter

A. INTRODUCTION

Chair Finley, members of the Commission
Ruth Spetter - representing myself

B. TESTIMONY

I am here to tell you my strong belief:

- That there are too few wolves for delisting.
- That more wolves are needed
- That the staff recommendation of delisting is not supported by its own report
- That the staff report fails to provide the information you would need in order to make that final determination
- That grounds upon which a decision to delist may be made require scientific information you have not been provided.

1. More Wolves Needed

I am not a wolf expert but I have been learning. Reading the book *The Wolf's Tooth*, by OSU professor Cristina Eisenberg, a renowned wolf expert, I was introduced to the concept of Trophic Cascades and the beneficial impact wolves have on an eco-system. As a top-predator they keep other species in check and then the food those species would over graze upon can come back. It all was proven in Yellowstone National park some years ago.

I've heard that the remainder of wolf prey feeds other animals in their territory.

In addition, wolves keep specie numbers in check and prevent overpopulation of their food species. The Staff Report states that, even with the wolves we have now, the elk population is very robust and increasing and in some areas "above established management objectives."

We need more wolves, not less. The wolf numbers we have have clearly been too few to provide the necessary balance between species and plant life. It all fits together.

To whoever it may be attributed the statement that "Everything is connected" is true and that includes us and the wolves. Decrease their numbers and the benefits they can bring to us all will be lost.

To the same effect I recommend the book *Wolfer* by Carter Niemeyer who was, for years, a federal agent hired to kill wolves and in the end could not support the slaughter in which he had participated and for which he'd been hired.

According to the staff report, the amount of predation by wolves, over many years, is minimal. There is, I believe, a compensation law if predation is proven to be wolf inflicted. If people are unhappy with that program then it should be improved, but permitting the easier killing of wolves is not the answer.

Not every predation is wolf inflicted and Carter Neimeyer's experience was that ranchers could take actions to protect their cattle or sheep or to decrease situations which, in a sense, invite wolves to come to their stock.

I recall a story in the *Oregonian* about a range rider who appears to have been working to good effect. This issue should not be the reason that all the good that wolves do for us and our state should be disregarded or that it is now time to slaughter the wolves we have allowed to grow here.

It seems very twisted to me that wolves were brought here from Canada just to be shot to death. What recently took place in Idaho, the glee of finally being able to slaughter wolves again, to shoot them on the ground and from the air, is horrifying to me. And, speaks of a barbarism that we, as a species, continue at our peril.

1. Staff Report and the Criteria

The obligation to make a determination regarding delisting does not mean that the standards for delisting have been met and it is my strong belief that the report you have been given does not provide Commission with the facts it needs.

By statute the Commission's decision must be based upon "scientific information and other biological data."

Reading the report it appeared to me that much of the supporting evidence is based upon supposition not fact. This is not a critique upon the work of staff – it is simply a fact.

Furthermore, the report appears to be internally inconsistent. Making recommendations for delisting while providing, in effect, statements supporting continuation of protection. Any scientist will see this and if the Commission's decision is based upon this report it will be found to be insufficient to meet the applicable criteria.

2. CONCLUSION

Any decision to delist must be based on findings of fact which support the determinations which must be made by law. I do not believe you have those facts. I believe, in fact that, the staff report provided to you does not, in its detail, support the recommendations made for delisting. If I, new to the subject and not a scientist, can see this, you can be assured that others, better trained than I, will see it too.

By the terms of your own staff's report, by findings of wolf experts, the Oregon wolves are too few, are only helping our Oregon environment and are a very limited presence in this state at this time.

This is not the time to delist and I strongly request that that be your final decision.

April 23, 2015

ODFW Commissioners:

My name is Suzanne Fouty and I live in Baker City, Oregon. I am a hydrologist and have been looking at the influence of wolves, livestock, elk and beavers on stream systems for the last 20 years.

Much money, time, and creative effort has been expended by the citizens of Oregon to plot a new path as it applies to wolves, livestock, and restoration of ecosystems. It is a path that includes the wolf as a partner in restoration. While there are impacts to livestock as a result of wolves, ranchers are adaptable and so impacts can be minimized by changing grazing practices on public and private land.

The benefits of a healthy, viable wolf population are enormous. Wolves play a key role in improving the water security of Oregon. Without them, our State will continue to struggle during periods of drought and periods of flooding. How so? If Oregon is to recover some of its water security and be less vulnerable to changes in climate, then we must have healthy stream systems. Improved health of these systems requires abundant beaver dams throughout public lands and, where acceptable, on streams that flow through private ground. As beavers build dams, they store water behind the dams and into the valley bottom soils -- water stored like a savings account to be returned to the river and to the communities during times of drought. But for beavers to build and maintain their dams they MUST have willows, cottonwoods and aspen to use. However, these are also what elk, deer and livestock like to eat. Enter the contribution of the wolf. Wolves cause elk and deer to move around more leading to less browse on these plants, allowing the plants to expand and provide food and building materials for beavers. Wolves also make ranchers more mindful about their livestock on public land and so better manage them. As a result, livestock pressure on these riparian plants also goes down. Without wolves, elk, deer and livestock will continue to eat these riparian plants and Oregon will become ever more water stressed.

We all need water and this drought is an important reminder that we need all kinds of partners. We need water and we need the help of beavers to repair our damaged streams systems and store water for us and beavers need the help of wolves. No wolves, then our streams will continue to decline in health and Oregon will be ever more sensitive to drought. We must allow for the expansion of wolves and maintain their protection. Delisting them allows local frustrations to compromise the water security of Oregon. Wolves are not a livestock issue, they are a water security, healthy stream systems and a healthy communities' issue. Livestock grazing is only one small aspect of the many uses of the land, while water is the issue of the day and into the future. Counties are requesting drought assistance. While helping each other is what we as a State and a Nation do, we must ask those communities do their part in enhancing water storage on the landscape. To do otherwise is to ask for a handout rather than assistance.

Therefore, I urge the Commission to maintain the Endangered Species status for wolves. I also encourage the Commission to actively engage with public land managers to alter 19th century grazing practices such that 21st century grazing on public lands minimizes conflicts between livestock and wolves. Again, livestock are only one use of public lands. While living with wolves can be challenging for some, living without water is impossible for all.

Elk
+
Deer
#1, high

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Oregon Farm Bureau Comments on Proposed Delisting of Gray Wolf

Oregon Fish and Wildlife Commission

April 24, 2015

Dear Commissioners:

Oregon Farm Bureau urges you to remove the gray wolf from the list of wildlife species that are protected under the Oregon Endangered Species Act ("OESA"), found at ORS 496.172.

By way of background, the Oregon Farm Bureau is a voluntary, grassroots, nonprofit agricultural organization representing Oregon's farmers and ranchers in the public and policymaking arena. As Oregon's largest general farm organization, its primary goal is to promote educational improvement, economic opportunity, and social advancement for its members and the farming, ranching, and natural resources industry as a whole. Today, Oregon Farm Bureau represents over 7,000 member families professionally engaged in the industry and has a total membership of over 60,000 families. Several of our members raise livestock, and have been very concerned with their ability to continue to run their operations after wolf reintroduction in Oregon.

The Oregon Wolf Conservation and Management Plan ("Wolf Plan") calls for initiating a process to delist wolves from the OESA when Oregon reaches the conservation objective of four breeding pairs for three consecutive years in eastern Oregon. This objective was met in 2014. Under the recently released Biological Status Review, ODFW found that:

Our analysis of future population growth using conservative parameter inputs indicates a high probability that Oregon's wolf population will remain extant in future years. There is a low probability of decline below conservation levels, and most of our simulated failures occurred within the first 10 years of simulation when the population is lowest. Based on observed population growth rates in Oregon the wolf population should surpass 100 to 150 individuals in the next 1-3 years, and the risk of conservation failure is even further reduced. Factors related to wolf health, habitat, dispersal, habitat connectivity, and wolf survival all indicate a healthy and growing population that is unlikely to decline in the near-term.

Based on the Biological Status Review and available data, the decision to delist the wolves is scientifically sound. There is simply no need to continue to extend OESA protection to the gray wolf as its population continues to increase.

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STATEMENT TO ODFW COMMISSION 4/24/15
By INGRID LUSTIG

RE: Exhibit F – Wolf De-listing Process

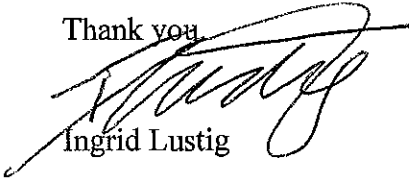
I am proud of my state of Oregon – wolves have come back after almost 70 years of being completely decimated. 70 years ago Oregonians didn't understand what science proves today: that predators have a crucial and beneficial place in our world.

And I salute ODFW and Federal Fish & Wildlife for doing a fantastic job in supporting the return of wolves to our state and minimizing conflicts with the ranching community. The state's wolf management plan is a success.

So, why now, at an official number of 77 wolves in just over 10% of wolf habitat, does ODFW want to consider delisting wolves from Oregon's Endangered Species Act? 77 wolves in the entire state is not a recovered species. We need to keep the current listing because the current management plan is successfully increasing wolf numbers.

Let's not go down the path of other western states, where wolves are being slaughtered left and right because their endangered protection was stripped away. Oregon is better than that.

Thank you



Ingrid Lustig

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Foster Fell
1104 NE 12th St.
Bend, OR 97701

April 24, 2015

Public comment to address ODFW recommendations for delisting wolves from protections.

Increasingly, we are seeing evidence to support wildlife policies that drastically cut back on hunting and killing predators. For example, for 30 years California has banned mountain lion hunting and in the past year has used lethal control only as a last resort for rare cases of urban sightings and reported livestock depredation. When, for example, California wildlife biologists capture the pop icon P-22 cougar in Griffith Park, they treat him for mange and let him go.

In September 2011, ODFW was about to move in such a way as to decimate Oregon's first reestablished wolf pack--the Imnaha pack.

In response, 35 of us in Bend met at the corner of Third and Powers St. (a block from the ODFW office) to protest this official act of irrational barbarity. There were enough of us to occupy each of the 4 corners. A police officer arrived on the scene to warn us about the haphazard way we had parked our cars on Powers Rd. But, as he was leaving, he said, "By the way, I support you on ~~this~~ what you are doing here."

In Salem that week some kids from the Cascadia group organized a lively protest at the State Capitol building.

Fortunately, a timely court injunction saved the Imnaha wolves, at least for the time being.

We have heard evidence that even in such wolf-hostile states as Idaho, nonlethal predator control does work in the isolated spots it is used conscientiously. We now see it is working in Oregon.

Even more to the point, the field work now being assembled points overwhelmingly to the basic fact that hunting predators like wolves and mountain lions creates chaos and disruption in these animals' social fabric. As a result--far from preventing livestock depredation and urban 'encroachment'--these disruptions actually set the stage for increased nuisance behavior.

Bend now finds itself ground zero for wildlife controversy. In response to the two recent cougar exterminations in our city we have had two large capacity public meetings and a promise from our City Council to draft a letter to ODFW calling for reform of its control policies.

Even our conservative-leaning newspaper, the Bulletin, seems to have taken a more reasonable approach, stating in an April 19 editorial:

"State wildlife experts should set Oregon's policy on when a cougar should be killed, *when it should be tranquilized and moved, and when it should be left alone.*"

I would urge ODFW to turn away from its traditional role as private hunting club and start to manage wildlife with rationality, science, and--yes--compassion for all Oregonians.

Foster Fell 4-24-15



April 23, 2015

Oregon Dept. of Fish & Wildlife
ATTN: ODFW Commissioners
4034 Fairview Industrial Drive SE
Salem, OR 97302

Dear ODFW Commissioners,

We are writing to strongly oppose delisting wolves from the Oregon Endangered Species Act. Why? Because doing so would fly in the face of unprecedented success.

Oregon currently has a reputation for having the best wolf protection regulations in the country. We have set an important precedent among states that have been tasked with managing wolves. Our wolf population has grown, while at the same time conflicts and depredation on livestock have decreased. This is a fact that ranchers and hunters don't want to believe and don't want you to know about.

Thanks to a settlement agreed to by all stakeholders, our current management strategy is based on use of nonlethal controls and improved husbandry. This strategy has proven to be very successful. It has benefited wolves, livestock and stakeholders alike. It has also made Oregon a model state, showcasing how it is possible to coexist with wolves through conservative and conservation-minded management practices.

We believe the move into Phase II population growth should not automatically trigger a move to delist wolves. Instead, we believe this is a juncture where current strategies should be evaluated and where the clear successes achieved should lead to continuing what is working and what we are doing correctly.

A number, as indicated by the number of breeding pairs, is just that, a number. There are more significant factors to consider beyond a static number that really doesn't represent the fluid and fragile state of Oregon's fledgling wolf population. We still have only 77 wolves in the entire state, and they occupy only 12 percent of their historic range.

To restate, we oppose removing wolves from endangered species protection because there is no good reason to do so. On the other hand, there is every good reason to continue current management methods. They have been proven to foster continued growth of Oregon's returned wolf population and to minimize conflicts with livestock. And they are a model and inspiration for the rest of the country.

Thank you for taking the time to read our letter. We trust you will make the best possible decision for all involved.

Sincerely,

Pam Round
Communications Director

April 1, 2015

To the Department of Fish and Wildlife Commissioners:

As a primary grade teacher, learning about land/animal conservation and preservation are major components of our curriculum.

As the future stewards of this planet, these students need to understand the importance and relevance of caring for and protecting our earth and all its inhabitants.

The work of organizations, such as Oregon Wild, the Fish and Wildlife Department, and the Oregon Zoo, creating outreach and educational programs for adults and children, is invaluable in teaching us about resources and strategies we must implement in order to keep the balanced ecosystem that nature intended.

I believe the story of "Journey" (OR7) and the Kids Howl campaign has inspired my students to learn more about animal and nature and how, as humans, we can continue to enjoy a happy, healthy coexistence. We have included letters and pictures in an effort to express our feelings on the subject.

The state cannot ask us to teach these common core standards and instill admirable qualities in children if we are not willing to model and then provide opportunities to practice these skills and utilize these characteristics later in life.

Please continue to support and fund these programs and organizations, and we, as educators, promise to continue helping students meet their potential as socially and environmentally responsible citizens.

Respectfully,

Mary Nelson
2nd/3rd grade teacher
Naas Elementary School
Boring, Oregon