

# **Exhibit B**

**Public Correspondence:  
Testimony Received at Meeting  
November 9, 2015**



Locally Grown  
and  
GROWING STRONG

November 9, 2015

Chair Finley and Members of the Commission:

On behalf of our nearly 7,000 member family farms and ranches, the Oregon Farm Bureau Federation (OFB) urges the Oregon Fish and Wildlife Commission to move forward with delisting the grey wolf under the Oregon Endangered Species Act (OESA) throughout the State of Oregon. Since you have received so much information about the delisting decision and its impact on wolf management in Oregon, we wanted to submit a detailed list of the ten reasons we believe a decision to delist wolves in Oregon is legally and scientifically sound.

**Ten Reasons Delisting is Appropriate:**

- 1. The Wolf Plan governs.** As you are aware, wolf management in Oregon is governed by the Oregon Wolf Plan. We are aware that opposition groups have identified a list of concerns that they believe will come with delisting. However, management of wolves is not governed by the OESA; it is governed by the Wolf Plan. *Management of wolves will not change with delisting.* Arguments that a delisting erodes protections for wolves in Oregon are simply incorrect – management will remain under the wolf plan, and protections for wolves will not decrease.
- 2. Wolf Management in Eastern Oregon is governed by Phase II.** Wolf management in eastern Oregon is currently in Phase II of the Wolf Plan, which anticipates that statewide delisting will occur once Phase II of the Wolf Plan is reached. In areas that are in Phase II management, due to the large number of wolves in the area, impacts to producers have been significant and have not been fully compensated by the state.
- 3. Wolf Management in Western Oregon is governed by Phase I and the federal Endangered Species Act.** Wolves in western Oregon remain listed under the federal Endangered Species Act and protected under Phase I of the Wolf Plan. Delisting will not impact wolves in western Oregon. These wolves remain fully protected under the Wolf Plan as their populations continue to grow,

volley side attacks on the plan when they do not agree with the state's management decisions. This is not effective species management and erodes trust with the groups that worked on a compromise for wolf management.

**10. Delisting is essential to continued faith in the Wolf Plan.** If delisting does not occur, OFB is worried that our producers on the ground will lose faith in the Wolf Plan and the commitments made by the state and wolf advocacy groups under the plan. As long as those interacting with wolves in Oregon continue to follow the Wolf Plan, populations will continue to grow. Producer buy-in and involvement are critical to the Wolf Plan's success and the continued success of the species in Oregon.

For these reasons, we urge you to move forward with delisting today and honor the commitments made under the Wolf Plan. Thank you for your attention.

Please contact Mary Anne Nash or Jenny Dresler at (503) 399-1701 with any questions.

November 9, 2015

George Rollins  
Pine Valley Ranch  
45845 Hwy 86  
Halfway, OR 97834

Comments to ODFW Commission Hearing regarding wolf de-listing for Oregon.

Pine Valley Ranch operates in Eastern Oregon in Baker County. We have a large US Forest Service grazing allotment in the Wallowa – Whitman National Forest. Our ranch has suffered losses due to wolves as have many others in Eastern Oregon. Our forest now has two wolf packs which we must contend with. We can readily testify that the wolf population is growing and thriving. Wolves are now venturing down from their “normal” and “historical” habitat into the Pine Valley meadows and low hills. Residents report regular sightings of the wolves in the vicinity of Halfway. Most sightings do not have them stalking or following wildlife, but rather walking alone across open expanses of land.

As a cattle producer in Eastern Oregon, we realize the wolves are here and will remain here. To us they represent another threat to our business operations with which we must adapt our management operations in order to survive and remain a viable and profitable business venture.

Admittedly, cattle producers did not support the reintroduction of the wolves into eastern Oregon. We were unsuccessful in our efforts to thwart the wolf program. Agreements were made between the Oregon Cattleman Association, ODFW and wolf proponents. The State set forth a management plan which all parties agreed to that included steps to remove the wolf from the endangered list as the population increased. The agreement included protections for the wolves throughout the process further insuring that the wolf population would continue to increase. These protections will remain even after the wolf is de-listed. Cattle producers agreed to the terms and have followed the rules ODFW gave us, used the non-lethal methods suggested by ODFW and suffered the losses which we were told would not happen. We have dealt with the wolf issue with integrity and honesty. We have stood by our word, which is incredibly important to us. We expect others to do the same. ODFW has collected data, made physical counts, investigated depredations and tried to be helpful to producers. ODFW has used agreed upon scientific methods that all involved with the initial settlement said they wanted. The science and verified physical counts of wolves has led the ODFW staff to recommend de-listing the wolf. We feel this is the appropriate and the right thing to do. It is important that government agencies deal openly and honestly with the public. As the current presidential campaigns are revealing, the public has grown tired and frustrated with government that does not govern fairly or follow thru with programs as they were initially designed to do. We believe the ODFW and the State of Oregon should do as they said and agreed to when existing agreements were made.

The wolf proponents have not been true to their word. They told ODFW what data and science they required to have trust in the wolf management plan. Now faced with the data, the science and the facts they refuse to accept the results. They claim to be conservationists but in reality are obstructionist only interested in litigation.

Attached to my comments is a 2009 editorial found in the High Country News by Mike Medberry who worked with the Idaho Conservation League. The editorial was written regarding Idaho's decision to allow legal hunting for wolves; however, Mr. Medberry's comments remain

appropriate for the current considerations which Oregon and the ODFW face today. Mr. Medberry writes that "conservation groups are fighting to keep the wolves listed as endangered for ecological reasons- despite the number of wolves and their apparent success." He continues by saying the conservationists views are "simply disingenuous, as the goal has clearly been met. Conservationists need to be honest about their goals. If they insist on supporting shifting numbers, they may find that they represent shifting support."

Cattle producers ask you as ODFW commissioners to be true to the agreements, to the science collected by your staff and true to your own integrities and vote to de-list the wolves.

MENU | High Country News



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WILDLIFE

18 COMMENTS

# Conservationists wrong to oppose wolf hunt

*Wolves have recovered, and it's time for more rational management*

Mike Medberry | OPINION | Sept. 18, 2009 | *Web Exclusive*

PRINT

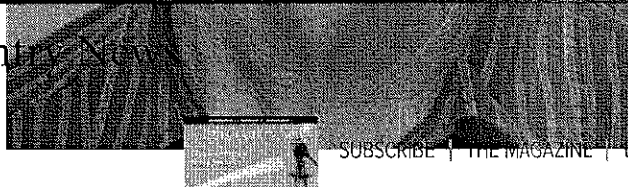
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I never thought I'd say this, but wolf recovery in the West has been the most successful program ever accomplished under the Endangered Species Act. Thanks to the efforts of the U.S. Fish and Wildlife Service, there are more than 1,650 wolves in Idaho, Montana and Wyoming today, as well as a couple more wolves in Oregon, Washington and Utah. Only 15 years ago, there were none.

For many years I doubted that wolves could ever be restored to the West. Now, packs can be found in most of the formerly vacant drainages in central Idaho, filling nearly all of their original niches. But because of their recovery, wolves can now be hunted in Idaho and Montana, where about 20 percent of the wolf population is scheduled to be killed this year. For just 12 bucks, you, too, can shoot a wolf in Idaho.

In the 1980s, I worked with the Idaho Conservation League, and we challenged the original wolf reintroduction proposal in court because we had evidence that two wolves already lived in northern Idaho. The Fish and Wildlife Service argued that only a reintroduction plan could recover the wolves in the Northern Rockies, and we lost the case. The federal agency was right, however, and its work in wolf recovery is, frankly, an amazing accomplishment.

When the wolves were brought back in 1995 and 1996, the decision stated that when the population grew to 15 pairs in two out of the three reintroduction states, the wolves would be "delisted" -- taken off the endangered species list that protects animals from being killed. A few years later, the number of breeding pairs triggering a delisting was increased to 30 pairs in two of the three states. In 2009, I am no longer working for the Idaho Conservation League, but I know that the number of wolves in Idaho is far greater than 30 breeding pairs.

Now, several conservation groups are fighting to keep the wolves listed as

Now, several conservation groups are fighting to keep the wolves listed as endangered for ecological reasons -- despite the number of wolves and their apparent success. The groups' lawsuit argues that the wolves have not recovered yet.

That is simply disingenuous, as the goal has clearly been met. Conservationists need to be honest about their goals. If they insist on supporting shifting numbers, they may find that they represent shifting support. More to the point, however, is their refusal to accept that this victory for wolves endangers the Endangered Species Act, which protects all endangered species. What Defenders of Wildlife and other groups have done in filing a lawsuit fails to serve the wolves, the integrity of the law and the people of Idaho and the West.

At the same time, Idaho's Department of Fish and Game needs to make rules that reflect history: Wolves were slaughtered in the past and must not be slaughtered in the future. So far, the state's rules are inadequate. If so many wolves are killed that fewer than 15 packs in both Idaho and Montana remain, the route to re-list the wolves under the Endangered Species Act should be clear, rapid and automatic. Punishment also should be severe and automatic for anyone who poaches a wolf, and the trapping and poisoning of wolves should continue to be illegal, as that is primarily what caused their extermination in the first place.

In addition, each wolf that is legally shot should bring in at least \$150 or even as much as \$1,000 to the state of Idaho. The pittance of \$11.50 for a hunting tag dishonors biologists, hunters, the federal and Idaho governments and the people of Idaho -- not to mention the wolves themselves. It also dishonors the Endangered Species Act, which acts as the conscience of our nation with regard to wildlife. We have paid dearly to have wolves returned to our land, and the hunting tags we issue should reflect that.

Finally, now is the time to stop bickering and begin to manage wolves rationally. I hope that the Idaho Department of Fish and Game makes it clear that wolves will continue to exist in our state forever. That is the agency's job as it begins this new chapter in wolf management, with hunting added to the mix. Conservationists have a different task: learning to accept some losses of wolves in order to ensure their continued survival as a species.

*Mike Medberry is a contributor to Writers on the Range, a service of High Country News (hcn.org). He lives in McCall, Idaho.*

Wildlife Writers on the Range

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More from Wildlife



November 5, 2015



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

**OREGON WILD**

Dear Chair Finley & Commission Members,

On behalf of Oregon Wild's more than 16,000 members and supporters across the state, we want to again express our serious concern with prematurely delisting wolves from the state Endangered Species Act. Delisting at this time and under these circumstances is not supported by science, the law, or the public.

You've heard from Oregon Wild several times throughout this process. You've heard us urge you to conduct an independent review of the science – something that is clearly called for according to our state's endangered species act. You've heard us ask that any final decision on wolf status not preempt the five-year review of the wolf management plan that is legally obligated to occur in 2015. You have also received nine separate scientific critiques signed by more than a dozen independent biologists, all of which have said that the ODFW staff science report is seriously flawed.

But perhaps most importantly, you've heard from the public that you serve.

***Of the more than 10,000 public comments submitted to and published by the ODFW Commission, 96% of them have been in favor of maintaining protections for gray wolves.*** On top of that already overwhelming majority, Oregon Wild and partner groups have submitted an additional 25,000+ public comments to this Commission, the Governor's office, the Oregon Legislature, and federal representatives – all opposing delisting at this time.

As a public interest organization, we have regularly told our members that the ODFW Commission needs to hear from you. We've told them that they have a voice, that they will be heard, and that they matter. We have told them the science matters. And we have told them the law matters.

Over the past six months, they have attended meetings all over the state. They've traveled from every corner of Oregon. They represent business owners, rural Oregonians, liberals, teachers, republicans, veterans, parents, biologists, and even former ODFW staff. Despite the diversity of their backgrounds, they have spoken overwhelmingly in opposition to delisting wolves. Thousands more have written in their opposition.

We have submitted testimony, expert analysis, substantive questions, and legal perspectives. Independent experts have questioned the state's science. And attorneys have cautioned that the state

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is violating numerous laws. Despite all of this, the agency seems determined to move forward with prematurely delisting gray wolves from the Oregon Endangered Species Act.

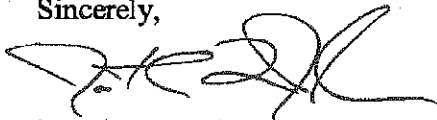
Over the last few years, Oregon's wolf management plan has been a model across the country for balancing science-based management, conservation values, and legitimate concerns against old prejudice and the fear of the big bad wolf. Since the 2013 settlement, we've seen the wolf population increase, while livestock depredations went down. In a state that values its conservation ethic, the extermination of wolves in the last century was a tragedy. We have a rare opportunity to right a historic wrong. But it's too soon to declare "Mission Accomplished."

With overwhelming public opposition, considerable criticism from independent scientists, and legitimate lingering legal questions, if this Commission chooses to delist wolves, it will have made a powerful statement on who - and what - they believe they serve.

I'd also like to add that in recent Commission hearings, Oregon Wild's position has been mischaracterized by anti-wolf voices. We very much look forward to the day when we can all agree that Oregon's gray wolf population has recovered to the point where it no longer needs protections from the state endangered species act. But with fewer than 100 wolves inhabiting a mere 12% of their suitable habitat - and a public which overwhelmingly opposes delisting - that time has not yet come.

I urge you to honor your duty to represent *all* Oregonians, your mission to protect and restore native wildlife and their habitats, and to listen to the public you serve. I urge you to honor our state's highest values.

Sincerely,



Jonathan L. Jelen

Development Director

(503) 283-6343 ext 224

[jj@oregonwild.org](mailto:jj@oregonwild.org)

## **TESTIMONY REGARDING THE PROTECTED STATUS OF THE RECOVERING WOLF POPULATION IN OREGON**

**Submitted by: Narda Tolentino on November 9, 2015**

**Residence: 1285 SW 27<sup>th</sup> Court  
Gresham, Oregon 97080**

First, my thanks to Chairman Finley and the members of the Commission for the opportunity to add my voice to the discussion of this very difficult topic. I am here, along with many others, to represent that portion of Oregonians who may not be ranchers or hunters, but simply, folks who look forward to teaching the next generations about the awesome experience and thrill of seeing and learning about wildlife. We can hope that wildlife as we know it, will still be around for them to watch, long into the future.

Since I was a child, I've been a wildlife nerd and in particular, regarding wolves. I raised my son to the joys of camping and wildlife viewing and we were always excited when luck would find us at the right place at the right time. We've been able to give the same wildlife experiences to the grandkids. As I have followed the discussions of why and why not to de-list our Oregon wolves, I see that the main population of objectors is represented by cattle ranchers and hunters. While I am not so hard hearted as to dismiss the hardships that the recession had on those agricultural sectors, I believe that those of us who stand in defense of wildlife because of the pleasure we get in seeing them and knowing they still exist, are a far greater majority of taxpayers and voting constituents, than the former mentioned group. That fact plus knowing that ranchers are reimbursed for predation on their herds and are given grazing rights on Federal Lands which, collectively are owned by all of us taxpayers, makes me feel that we should have at least a fair share in determining whether de-listing wolves at this time is a prudent measure.

In trying to identify a population of Oregonians who could more closely be identified as proponents of wildlife, I thought of our kids always wanting to go to the zoo to see the animals. So, I turned to the Portland Zoo web site. It turns out that the Zoo's stated purpose is to inspire people to make a difference for wildlife. The Zoo director back in 2013, Kim Smith, was quoted as saying, "People in this region have a deeper connection to animals than any place I've seen". That year, attendance had soared to around 1.6 million.

The following year, 2014, The Bulletin, the daily newspaper in Bend, Oregon quoted data from 2013 showing that the percent of Oregonian residents owning a hunting license, among ages 12 to 69, was down to 8.3% of that population, out of 2.9 million residents, which, if accurate, would be quite a lot below the 1.6 million attendees interested in seeing wildlife at the zoo the previous year. The decrease in hunting licenses sold is a fiscal matter for ODFW, since much or most of its budget comes from hunting and fishing licenses. This is a serious budgetary problem. None of us want to see the demise of ODFW nor that of the families of livestock farmers and hunters. However, since the majority of the population consists of wildlife admirers and viewers, rather than livestock owners and hunters, it would seem that we hold the most voting power and pay the most taxes. Couldn't this fact, somehow, be used to find new sources of revenue for ODFW to replace the dwindling input from hunting and fishing licenses? Shouldn't we have equal or greater say in the decision of when to de-list our wolves?

November 9, 2015

Oregon Department of Fish and Wildlife Commission  
4034 Fairview Industrial Drive SE  
Salem, OR 97302

Chair Finley and Commissioners:

My name is Robert Beschta and I am an emeritus professor in the Department of Forest Ecosystems and Society at Oregon State University (professional affiliation provided for informational purposes). For more than four decades I have participated in research, teaching, and extension activities assessing the effects of land use practices on watersheds and plant communities in Oregon and other areas of western North America. However, because the issue in front of the commission today is the potential delisting of wolves in eastern Oregon, I will focus my brief comments on that part of the state, particularly with regard to public lands.

Oregon's gray wolves were extirpated decades ago at a time when the scientific community had not yet discovered the concept of a "trophic cascade." Simply put, a trophic cascade occurs in terrestrial ecosystems when large predators alter the behavior and/or density of prey species, such as elk and deer, thereby allowing native plants to continually establish, grow, and reproduce. Thus, having a functional top predator guild is at the core of maintaining native plant diversity.

Some of the greatest biodiversity associated with public lands in eastern Oregon normally occurs in aspen stands and riparian areas (Johnson and O'Neil 2001). These diverse plant communities typically have a crucial role in sustaining a wide range of native wildlife ---including birds, butterflies, bears, and beaver as well as aquatic organisms such as amphibians and salmon. And, of course, healthy aspen stands and riparian plant communities are valuable habitat for elk and deer.

In the absence of an apex predator such as the gray wolf, high levels of herbivory by wild ungulates can limit the growth and reproduction of native plants in aspen stands and riparian areas thus, over time, dramatically altering these plant communities (Beschta and Ripple 2009).

After the Commission's meeting in Bend last April, I headed to eastern Oregon to evaluate the status of aspen stands. My observations and measurements in multiple aspen stands across three national forests indicated that young aspen sprouts in many areas are no longer able to grow above the browse level of elk and deer. In other words, herbivory from the combined effects of elk, deer, and livestock will ultimately cause the loss of aspen from many areas if current trends continue. Furthermore, the normally diverse understory of deciduous shrubs typically found in aspen stands was nearly always absent. I have also conducted research in eastern Oregon's riparian areas and unfortunately many of them are also suffering from the long-term effects of too much ungulate herbivory.

The condition of many aspen stands and riparian areas on public lands in eastern Oregon indicate they are in dire need of relief from the ongoing levels of herbivory associated with wild ungulates and/or livestock. With regard to wild ungulates, it has become apparent to the scientific community that a functioning large predator guild, particularly one that includes an apex predator such as the gray wolf, is needed to insure the sustainability of diverse native plant communities, via a trophic cascade, as well as the sustainability of wildlife that depend on these communities. Given this situation, I would strongly indicate that now is not the time to delist wolves in Oregon.

I thank the Commission for this opportunity to provide testimony and I would be willing to answer any questions that the committee might have.

Sincerely,

*Robert L. Beschta*

Robert L. Beschta, PhD

4005 NW Princess St.

Corvallis, OR 97330

Beschta, R.L., and W.J. Ripple. 2009. Large predators and trophic cascades in terrestrial ecosystems of the western United States. *Biological Conservation* 142: 2401-2414.  
Johnson, D.H., and T.A. O'Neil (eds). *Wildlife-habitat relationships in Oregon and Washington*. Oregon State University Press.



October 12, 2015

Chairman Michael Finley  
Oregon Fish and Wildlife Commission  
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E-mail: [odfw.comments@state.or.us](mailto:odfw.comments@state.or.us); [odfw.commission@coho2.dfw.state.or.us](mailto:odfw.commission@coho2.dfw.state.or.us)

Re: Recommendation to remove the gray wolf from the Oregon Endangered Species List

Chair Finley and Members of the Commission:

As indicated in our April 23, 2015 comment letter, the Rocky Mountain Elk Foundation (RMEF) continues to strongly recommend a statewide removal of the gray wolf from the Oregon Endangered Species list.

At the October 9<sup>th</sup> Oregon Fish and Wildlife Commission meeting, staff presented the Updated Biological Status Review and Evaluation of Criteria to Remove the Gray Wolf from the List of Endangered Species under the Oregon Endangered Species Act. This document clearly indicates that through careful management by dedicated wildlife biologists, Oregon's wolf population has become firmly established, is expanding its range across the state, is growing at an annual rate of greater than 40 percent, and has more than achieved the established threshold to be considered for delisting. The document clearly indicates that the current gray wolf population exceeds each of the five statutory requirements for statewide removal from the Oregon Endangered Species List. It also clearly states that it is extremely unlikely that Oregon's wolves will be in danger of falling below the conservation-failure threshold within the next 50 years.

When first written and published in 2005 with stakeholder participation (and revised in 2010) the Oregon Gray Wolf Conservation and Management Plan envisioned removal of the wolf from the endangered species list upon achievement of the plan's stated population objectives for Phase One. The wolf population has surpassed that threshold and is now in Phase Two management. The plan calls for delisting the wolf prior to entering Phase Three management, the sustainment phase where the wolf population will be managed in concert with its wild prey base and interaction with human activities, principally raising livestock. Delisting should take place now, as prescribed in the management plan.



# ROCKY MOUNTAIN ELK FOUNDATION

Oregon's wolf population is rapidly approaching the point where human tolerance and unacceptable impacts upon the wolf's deer and elk prey base must be addressed. Removal of the wolf from the Endangered Species List marks the successful conservation accomplishments intended by the Oregon Endangered Species Act, and will materially contribute to management of the wolf into the future.

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, and other recreation.

Thank you for the opportunity to submit our recommendation for statewide removal of the gray wolf from the Oregon Endangered Species List.

Sincerely,

M David Allen  
President & CEO

November 9, 2015

To Chair Finley and Fish and Wildlife Commissioners:

I would just like to speak to a point that I keep hearing. That is that with or without delisting, the wolf population will continue to grow and thrive because their protection under the Wolf Management Plan is equivalent to that of ESA protection, since the Plan tightly controls who can and cannot kill a wolf and under what circumstances. This assumes that your agency has control over all elements that could take a wolf's life – but it doesn't.

Your agency has acknowledged that the our wolf population is low and is not yet fully recovered. There is no guarantee that our wolf population won't drop to unstable levels if delisted.

With most of our wolves concentrated in the NE corner, these wolves are vulnerable. You have no control over a possible die-off due to disease or a major loss of habitat and the resulting death of pups due to a forest fire, such as we have seen this year in many other parts of the state. It could happen there. You have no control over the poaching of our wolves as they disperse into Idaho or Washington, as has happened with several of our wolves, including the recent poaching of OR14. You also have no control over the very possible federal delisting of all grey wolves in the lower 48, with the exception of the Mexican gray wolves. This would leave our paltry population of western wolves including the Rogue Pack without any ESA protections.

Under Phase II, wolves in the NE can now be killed after two depredations rather than the four depredation rule of Phase I. This should satisfy the ranching community. However, they seem to feel that delisting will give them even more leeway to kill wolves. If they are right, then how is protection under the Wolf Plan equivalent to ESA protection? You have no control over "zero tolerance" anti-wolf sentiments and the perception that delisting is a green light for killing unwanted wolves. The penalties will be less severe.

The point is that our wolves are in the early stages of recovery and their numbers simply don't leave room for error.

I'm not asking for special treatment for our wolves. No other species with less than 100 confirmed individuals have been removed from Oregon's ESA. Wolves deserve the same fair and equal treatment as every other species in this state. To not do so makes the decision suspect to being politically rather than scientifically motivated. There is no scientific review that agrees with your agency's delisting recommendation. Please postpone your decision to allow for an independent 3<sup>rd</sup> party scientific peer review

Thank you for this opportunity to express my concerns.

Sincerely,

Joan Beldin  
10223 N. Hudson St.  
Portland, Oregon 97203



Please Support Delisting Wolves

by Daniel Ray

Dear Commissioners,

I urge you to totally delist wolves in Oregon. They should be considered neither endangered nor threatened.

I have personally experienced plenty of wolf sign (i.e., tracks, scat) and sounds in Oregon (and in Idaho). I have seen their effect on wild game. The Oregon population is thriving and increasing faster than is healthy for other mammals and other concerns in Oregon.

Oregon scientists and the Commission put great thought and effort and wisdom into the Oregon Wolf Plan. The criteria have been met. My reasoning and my experience with deer and elk and wolves in Oregon (and in Idaho) show me that it is prudent and conservative to delist the wolves in Oregon, now.

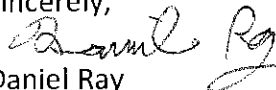
If you do not de-list them now, great damage and negative impact will happen to our natural resources of elk and deer, to the livestock of our ranchers, and to the economic well-being of Oregon.

All the wolf delisting and population objectives have been met and exceeded. They are already filling all suitable ranges. They have high fecundity. There is full protection for wolves in Phase I and Phase II in Oregon. The wolf population is very healthy and growing fast.

Wolves should be delisted now. If not, many negative repercussions will be evidenced sooner than many people imagined. Damage hit Idaho much sooner and harder than many thought would happen and we do not want that to happen in Oregon.

Your and the biologists carefully designed objectives have been met so it is time to delist. Please stick with the facts and science and do not fall prey to emotion and unfounded hypotheticals.

Sincerely,



Daniel Ray

4550 Badger Corner PI NE

Salem OR 97301

ph. 971-388-9457

*NOV. 9, 2015*

Jayne Miller, Director, Oregon Cougar Action Team  
PO Box 2682, Corvallis, OR 97339  
Testimony, Oregon Department of Fish and Wildlife,  
November 9, 2015

## Apex Predator Guilds and Trophic Cascades

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The most efficient landscapes are collectively managed by the wolf, the cougar and the bear. Apex Predator guild relationships and their collective effects, which have evolved over many thousands of years, are all missing from ODFW's apex predator plans.

Missing also in these plans are the Trophic Cascade effects ODFW's plans have inflicted upon our ecosystems. For example, all throughout the cougar management plan the failing vegetation in the study kill sites are mentioned, yet only one sentence in the cougar plan alludes to vegetation care. Although the ODFW wolf plan discusses trophic cascade issues in two paragraphs, both the wolf plan and the cougar plan do not address the trophic cascade issues behind the plant base decline. Plants are key to the success of any wildlife management plan.

How many cougar, wolves and bear do we need to sustain a healthy ecosystem?

Even though modeling can be used to hypothesize a future population and has a clear benefit, it also has a cost in the sense that a measurement may only be relevant at the scale at which it was taken.

For example, if an Environmental Impact Statement were done using ODFW's current cougar management plan, it would be lacking the historic range variables and carrying capacity of Oregon's natural resources that the cougar managed to sustain without the wolf. Left out of the modeling efforts in both plans

are the historic plant base before the wolf was eradicated and the cougar near extinct. Along with being a politically arbitrary number (reference: Dr. Wielguss peer review 2010, [http://www.orecat.org/dr\\_wielguss\\_cougar\\_peer\\_review](http://www.orecat.org/dr_wielguss_cougar_peer_review)), the modeling of cougar populations was based on irrupted ungulate numbers with no historic grounding. In all of ODFW's apex predator plans, the historic range variables are lacking and population numbers, kill plans, and hypothesis are all based on hyper-abundant numbers of deer and elk human induced populations, that greatly exceeds what Oregon's ecosystems historically supported. Now add livestock across the landscape and you have the perfect storm for ecosystem failure.

We must not kill the wolf, the cougar or the bear until we go back further in history and start from the beginning and design better management plans that includes their apex predator relationship and a more natural population base of large herbivores.

Creating unrealistically low predator populations can collapse the ecology of fear and heavily impact the plant base with high numbers of ungulates. Large native ungulate populations can thus alter Oregon's once vibrant ecology and rural income. Poverty knows no shame like the poverty and shame from a destroyed ecosystem that ODFW apex predator plans are sending us.

We do know from prior studies, that the wolf cannot maintain a balanced ecosystem alone. (Ripple, Beschta, July 2005. Linking Wolves and Plants: Aldo Leopold on Trophic Cascades. BioScience Vol. 55 no. 7) They need the cougar. The lack of updated science in the cougar plan, the flawed cougar population modeling that is based on an irrupted herbivore population, and the predator prey ratios coupled with the cougar harvest increase and this aggressive kill program, could bring Oregon's cougar back near the extinction levels of the 1960's. There is no plan of sustainability in ODFW's cougar

management plan, and no idea how many cougar we need to support the wolf and protect and sustain Oregon's unique ecosystems.

Trophic Cascade is not fully addressed in the wolf plan, and not addressed at all in the cougar or bear plan. The importance of having an ecologically functional apex predator guild is not addressed in either plan. If such information was included, it would be readily apparent to members of the commission that delisting of Oregon's wolves and the existing kill plans for cougar, are not in the best interest of Oregon's ecosystems.

The questionable land ethics behind the decision making of ODFW's cougar management plan has also usurped the democratic process, and also species selected the wolf above the cougar; leaving to the citizens of Oregon the moral responsibility of holding ODFW accountable.

## Testimony on the Proposed Delisting of Gray Wolves

Oregon Fish & Wildlife Commission Meeting – November 9, 2015

I'd like to thank the Commission for the opportunity to testify today and for all you and the Wolf Program managers have done to make our wolf program successful so far. I do believe, however, it is too early to remove endangered species protection for wolves.

One of the factors that influenced my opinion was a review of how past Commissions have evaluated the biological status of previously delisted species. I looked at the status reviews for two other iconic species: the peregrine falcon, delisted in 2007, and bald eagle, delisted in 2012. Although these are bird species, general population characteristics at the time of their delisting can be compared directly to those of the current wolf population.

- Prior to delisting, peregrine falcons and bald eagles were found breeding in **all suitable habitat throughout the entire state**. In comparison, wolves currently occupy only 12% of their estimated potential range and breeding pairs are confined primarily to the northeast corner of the state.
- The peregrine falcon recovery goal was 30 breeding pairs; however, the Commission did not delist the falcon until there were 124 breeding pairs - **over four times the number recommended in the recovery plan**. The bald eagle was not delisted until the number of breeding pairs was **more than double the recovery goal**. In contrast, this Commission is considering delisting wolves immediately after reaching an arbitrary and unscientific population objective of only 4 breeding pairs in the eastern half of the state for 3 consecutive years.
- The peregrine falcon and bald eagle were delisted only after **actual statewide recovery was verified** by extensive, multi-year, field surveys conducted by independent experts. In contrast, this Commission is currently considering delisting wolves based only on the **potential for statewide recovery as predicted** by a simplistic and assumption-filled population model.
- Prior to delisting, the peregrine falcon status assessment underwent a **formal peer review** by three nationally recognized experts and all three experts supported delisting. There has been no formal peer review of the wolf status report and all scientists who have submitted testimony **do not support delisting**.

What became apparent after making these comparisons was that a much more conservative approach is usually taken when evaluating population status for delisting. Unlike the gray wolf, most species are not considered controversial at the time of their delisting. This fact makes it all the more important that this Commission proceed with extreme caution. At a minimum, delisting should not occur until the 5-year review of the Wolf Plan has been completed and independent experts have reviewed the biological status report and agreed with its conclusions. Ideally, as with previously delisted species, delisting should not occur until field surveys have verified that wolves are actually breeding in all suitable habitat throughout the state.

Randy and Pam Comeleo  
1475 NW Skipanon Drive  
Corvallis, OR 97330

**LARRY JACOBS**

*14011 SW Roy Rogers Rd, Sherwood. OR 97140*

**Oregon Department of Fish & Wildlife  
4034 Fairview Industrial Drive SE  
Salem, OR 97302**

Chair Finley, Members of the Commission

My name is Larry Jacobs- I am on the board of directors and a past president of OR-FNAWS.

- Prior to the adoption of the Oregon Wolf Conservation and Management Plan in Dec 2005 I made a point, along with so many others, to provide testimony and comment to develop and draft the Wolf Plan.
  - Please respect the many hours individuals and groups, with vested interests, put into establishing this Plan.
  - The Plan contains a clear conservation population objective based on the requirement for delisting.
  - This requirement for delisting under OESA has been met.
  - ODFW has reviewed the best available science and has prepared a Biological Status Review which demonstrates that all the delisting criteria has been satisfied.
- I fully support staff recommendation for the commission to amend OAR-635-100 -0125 to remove the gray wolf from the list of Endanger Species Under the Oregon Endangered Species Act.

Respectfully submitted

Larry Jacobs

My name is Miguel, I am here today to be the voice of the wolves, who want to have peace and harmony with us, Just they way they lived thousands of years ago, on this continent, on this land before us. We have to grow and learn how to share the space on both sides. To find peace and harmony the way it is suppose to be. I believe we have the time to save the wolves, but we need to work together to not loose them like other species already in extinction.

This is the generation for the future, what is the legacy for our kids? What do we leave for them? What will they think about us, if we continue to make all this destruction?

Please vote to keep the wolves on the endangered species list!!!

Thank you,  
Miguel

Hi my name is Michelle Seidelman, Thank you for allowing me to speak here to you today. Obviously a tremendous amount of information from world renown scientists will be shared here today for keeping this very small population of wolves in Oregon on the endangered species list. A small amount of disease epidemic would wipe them out again, trying to move the entire pack family over the large 6 lane interstate 84 is almost a insurmountable challenge and the fact the Oregon wolves are currently only occupying about 5% of the habitat ODFW itself has deepened suitable, in a land that used to belong to them.....But that is not what I want to talk to you about today. I want to talk to you about the intangible.....the value of life, the legacy we leave behind.

As I child I wrote all my reports on wolves..... I was mesmerized by their beauty, their commitment to family, the sounds of their howls and the horror of there near extinction. I can't comprehend a world for children today without wolves in it. What a unbelievable blessing to be given this time here and now on earth with such an incredible species as the wolf. With a soaring world population of 7.5 billion and ever growing population in the state of Oregon (currently at 4 million) what hope do these wolves have of making it, if we as humans don't make a conscious choice that we are all created here at this time because we have place here at this time and are willing carve out the smallest amount out land, thought, time and energy to coexist. I do realize that this may at some point require a small amount of dogs and the use of a few Cowboys again, but isn't that worth it?? As humans we are to be stewards of the land, a voice for the voiceless and have the ability to step out of our selfishness and into empathy for another living being. If we can not do this, I do believe we are all lost in only what our human needs are and we will continue to loose species at an alarming rate, until we loose to many keystone species that our very lives depend on. Like it or not, we are depended on each other and bio diversity is necessary for survival. I am not so sure I would want to survive on a planet without the unique beauty each living thing has to offer, how boring, how mundane. So please, have the courage to step out today. Step out of selfness. Step out of feeling inconvenience. Step out of greed and make a stand for this endangered species that used to run wild all over the Americas!! It is a step in the right direction. Please vote to keep the wolves of the endangered species list.

Thank you!



09 November, 2015



ODFW Commission meeting November 09, 2015  
RE: Public Testimony, Oregon Wolf Conservation and Management Plan  
**TAO SUPPORT OF THE ESTABLISHED WOLF PLAN**

Chair Finley, Members of the Commission, Director *Melcher*, for the record, my name is Kevin Thompson, and I serve as President of TRADITIONAL ARCHERS OF OREGON.

Since the inception of the Oregon Wolf Conservation and Management Plan in 2005, TAO has been supportive of the efforts of the Commission and the Department of Fish and Wildlife (ODFW) in the execution of this plan. We are very excited that milestones have been reached that allow the consideration of advancing into the second phase of the Wolf Plan.

TAO is hardly qualified to pass judgment on whether the status of the wolf recovery is sufficient to warrant delisting from the Oregon Endangered Species Act (OESA). We rely on the information provided to us by those that you have charged to administer this recovery. The biological data provided by Wolf Program Coordinator Russ Morgan and his staff presents a bright testament to the effectiveness of the plan and prediction that it will continue to allow wolves to thrive here in Oregon. This Biological Review addresses all five concerns that are the critical barometer for the consideration of delisting from the OESA. Based on this review, TAO believes there is a high probability that wolves will continue to flourish and expand their range across the state for all of Oregon to enjoy.

TAO supports the recommendation of ODFW staff and asks the Commission to move forward with the delisting of wolves from the Oregon Endangered Species Act.

Thank you for the opportunity to testify.

Kevin Thompson  
President, Traditional Archers of Oregon

## Wolves Should be Totally Delisted in Oregon

Testimony of Brian D. Ray, Ph.D.

November 9, 2015

to:

Commissioners, Oregon Department of Fish and Wildlife

Respected Commissioners,

My name is Brian Ray. I hold a Ph.D. in science education from Oregon State University and an M.S. in zoology, especially mammalogy, from Ohio University. I am a researcher, constantly participating in the scientific endeavor. I am an environmentalist, an organic gardener, a naturalist, a hunter, and a scientist.

My parents and siblings would say that I loved observing, reading about, and handling animals as a child. Now I am grown and would say that I thoroughly enjoy observing, studying, pursuing, and considering the ethology and lives of animals, especially mammals. I spend a lot of time in the forests and mountains all across Oregon. I enjoy Douglas squirrels, wolves, coyotes, deer, elk, bear, rabbits, Stellar's Jays, and more.

I have personally seen plenty of wolf sign (scat and tracks) in Oregon (and Idaho, by the way). I have heard them howling in Oregon. I have seen how wolves put a real dent in the behavior and numbers of elk in an area. The wolf population is healthy and vibrant and growing in Oregon, the scientific evidence tells us.

If we wait any longer to delist, that would put Oregon in danger of far too many wolves in the near future. This would damage large mammal populations far more than most Oregonians want. It would harm the economy of Oregon. It would damage game and domestic mammal numbers in a way that would drastically hurt the interests of Oregon ranchers and hunters and those who want to observe wild game out in the forests and mountains.

Delisting wolves is in accord with solid scientific and experiential evidence. Delisting wolves keeps the proper philosophical perspective that these animals are no more nor less important than any other wild animals. Delisting keeps the reality perspective that we humans manage, conserve, wild animals.

Not delisting would keep pseudo-environmentalists in a position of legal power with the threat of suing the people of Oregon. Not delisting wolves would allow pseudo-environmentalists to keep a bad tool in their power purse. Not delisting wolves would help pseudo-environmentalists convince people that killing any animal is wrong and hides their bad philosophy and bad science and their ill-begotten fund-raising. The argument for not delisting wolves is based on no science and no solid evidence of anything.

Also, it is a bad idea to down-list wolves from endangered to threatened. They are not endangered and they are not threatened. There is no good scientific reason to consider a "threatened" listing. Wolves are breeding fast and furiously and are aggressively spreading

throughout available habitat in Oregon. Wolves are canids -- dogs -- and they are quick to mate, reproduce, and spread. Without delisting, their population growth rate and numbers will be far too much and harmful to many Oregonians' interests.

Now is the time to delist wolves. We do not want to be too late to delist and see the tremendous damage to other wildlife and domestic stock that our neighbors in Idaho have experienced.

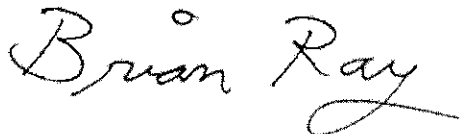
The Wolf Plan was developed after a lengthy open public process. Scientists and the ODFW have done a good job. The Oregon wolf population is healthy and growing fast. Those of us who spend much time in the field with wolves and other mammals know that it is time to delist.

As a naturalist, zoologist, mammalogist, environmentalist, organic gardener, hunter, and conservationist, I urge you to totally delist the wolves now. <sup>statewide</sup>

^

Thank you.

Sincerely,



Brian D. Ray, Ph.D.  
Zoologist and biologist  
Oregon resident all my life  
Member, Oregon Hunters Association  
Active researcher  
Salem, Oregon  
503-364-1490.

Ellen Marmon  
2083 Dewey Street  
Eugene, Oregon 97402

Chairman Finley, Commissioners;

Thank you for allowing me this time to speak.

I'm from Eugene, grew up in Corvallis. I come from a farm family; my grandparents raised sheep in Bellfountain, just south of Corvallis, and I have raised sheep. I know first-hand what it's like to lose livestock to predators; I've lost sheep. So I completely understand the concerns of livestock producers.

But I was also raised by a man who loved the outdoors. Our family camped, fished, hiked, and my dad was a hunter, as well. He raised us to cherish Oregon's wilderness.

I believe that wolves are a vital, integral part of that wilderness. I love that they are returning to Oregon.

There's pretty good evidence from Yellowstone that wolves can help balance ecosystems, and maybe for that alone they are valuable, but I think they are also important to the spirit of Oregon.

I don't believe that 81 wolves, living in 10% of their available habitat is a large enough population to consider removing protection. I don't want to see Oregon rushing headlong into delisting, especially since it seems the current wolf plan is working for livestock producers and for wolves.

I believe we have room in our landscape for these amazing animals, and I hope we can keep them protected until they are more plentiful and more dispersed.

Thank you.

PS I come from a family of Danish immigrants, and I've been fascinated to see that wolves are returning to Denmark. The Danes I know welcome them. Denmark is a tiny, very settled country, with lots of farmland, and few forests; I think if they can welcome wolves, so can we, with our abundant wilderness.

Good Morning: Chair Finley and the Members of the Commission,

I'm here today to speak in favor of keeping Wolves as an endangered species.

I have been involved in cat rescue for over 20 years and even though cat rescue is all about to many animals needing help I will do what I can to help all animals in need of rescue.

Wolves are in desperate need of rescue at this time. Not because there are to many but because there are to few.

The wolves living in Oregon are primarily in the Northeastern part of the State. In my research of NE Oregon I learned the human population is approx. 124,779 and the Sq. miles of the area is 11,464, that works out to be approx. 10.88 people per sq mile. As for the approx. 75 wolves in the same area that works out to be about 0.0065 wolves per sq mile.

I tried to fine the number of cattle in the same area but I could not find that number but I'm sure you can.

I did however find an article in the Eastern Oregon, Fall 2015 Newsletter about cattle rancher Todd Nash who has 800 head of cattle on 1000 acres. That is a much larger number of cattle then wolves. The one thing that really struck me was in the entire article he never mentioned having a problem with wolves or even wolves at all. His only comment to losing cattle was to disease and lightning. Most common being a respiratory disease and even with vaccinating his heard in one year he lost 11 cattle and in another year he lost fourteen cattle from a lightning bolt that hit a tree they were laying under.

As far as the business of cattle ranching he stated it is a great time to be in the cattle business. That between 2013 and 2014, revenues for ranchers have jumped more than 40 percent in Wallowa County alone.

This leads me to believe that there is no real damage or danger being done by the very few wolves in the area in which the majority of the wolves in the State live.

Once again I would like to thank you Chair Finley and Members of the Commission for your time and consideration in this matter.

Dee Ann Montgomery  
Eugene, OR

## IN SUPPORT OF GRAY WOLF DE-LISTING.

Members of the Commission, Thank you for your time today.

My name is John R. Putman. I live in Tillamook, Oregon. Among other memberships and service in professional and several civic organizations, I am here as the Tillamook Chapter President of the Oregon Hunters Association. I am also one of two Northwest Directors on the Board of the Oregon Hunters Association. I am a family man, a sportsman, a hunter and fisher, an environmentalist.

Commissioners, your role here, today, is important and appreciated. You get to think and analyze critically, and you get to make decisions at the intersection of both the natural and human worlds. Thank you for your service.

You and/or your predecessors were a part of a **process** begun over 10 years ago and continuing today to decide how wolves and humans will interact and coexist. Before this day, years ago when there was less science, less data and less emotions, this Commission adopted the Oregon Wolf Plan as a product of all interested parties' input. As a result of that collaboration and deliberation, criteria were established for several phases, including the successful end of Phase II in order to begin Phase III, de-listing.

The Wolf Plan established the criteria for de-listing. Your scientists, your biologists, have studied and measured, have quantified and analyzed data on wolf packs, recruitment, numbers, ranges, damage, and more. Your scientists, your biologists, now concluded that the Oregon Wolf Plan criteria for phase II have been met.

I support their analysis and conclusions presented in ODFW's Biological Status Review for the Gray Wolf dated March 31, 2015.

1. **The species is not now (and is not likely in the foreseeable future to be) in danger of extinction in any significant portion of its range in Oregon or in danger of becoming endangered.**

This criterium focuses its scope on Oregon.

Gray Wolf (*Canis lupus*) species population in Oregon since 2008 to 2015 (present) is

**expanding:** – in numbers of individuals,

– in numbers of pairs,

– in numbers of packs, and

– in the physical, geographic area in Oregon used or occupied by gray wolves.

– See ODFW's Biological Status Review for the Gray Wolf dated March 31, 2015 ("Wolf Status Review"), p. 4 - 7, inclusive.

A species expanding its population numbers and range is the opposite of a species in danger of extinction. Therefore, the Gray Wolf (*Canis lupus*) species **is not now in danger of extinction in any significant portion of its range in Oregon.** Further, therefore, the Gray Wolf (*Canis*

*lupus*) species is not in danger of becoming endangered. Therefore, this criterium #1 for delisting is met.

- 2. The species' natural reproductive potential is not in danger of failure due to limited population numbers, disease, predation, or other natural or human-related factors affecting its continued existence.**

The Wolf Status Review states:

"Minimum number of breeding pairs in Oregon increased since 2009 but annual variation was present. [ See Figure 2, p. 5.] Breeding pairs are considered successful if at least 2 pups survive and are documented at the end of the calendar year... [2014] marks the third consecutive year in which at least 4 breeding pairs occurred in eastern Oregon; prompting entry into Phase II of the Wolf Plan. ...Oregon's minimum-observed count method is likely to underestimate pup survival because pups are not always together, nor are they always detected during winter surveys." – See Wolf Status Review, p. 6.

Therefore, in Oregon wolf reproduction is healthy and the population is expanding.

The wolf population limitation and mortality factors are addressed by ODFW biologists in Wolf Status Review, p. 15 - 19, inclusive. Those biologists do a better job describing these population limiting factors than I can summarize. The bottom-line here is you have an expanding population of an apex predator which is not hunted recreationally or trapped commercially. While disease has been observed, it is not a limiting factor to this expanding wolf population.

This criterium #2 for delisting is met.

- 3. Most populations are not undergoing imminent or active deterioration of range or primary habitat.**

This criterium is not limited in scope to just Oregon. Rather, this criterium implicitly requires consideration of gray wolf populations outside of Oregon.

"Figure 1: Northern Rocky Mountain Gray Wolf Population Area, 2014", attached and incorporated here by reference, depicts wolf packs in Oregon and neighboring states with wolf packs. This information along with the narrative within the Oregon Wolf Plan on the source of Oregon wolves and their expanding population through time demonstrate gray wolves have not yet filled the habitat in Oregon which could support their area and prey needs. See also Wolf Status Review, Figure 7, and Table 3, both on p. 13.

This criterium #3 for wolf delisting is met.

- 4. Over-utilization of the species or its habitat for commercial, recreational, scientific, or educational purposes is not occurring or likely to occur.**

Currently, to my knowledge, state and federal endangered species laws prevent over-utilization

of gray wolves. General hunting (recreational) and trapping (commercial) are currently not allowed for wolves in Oregon. According to the Wolf Status Review, incidental take permits for scientific or educational purposes is not likely to result in any over-utilization of the species. See also ODFW's Biological Status Review for the Gray Wolf dated March 31, 2015, Figure 7, and Table 3, both on p. 13.

"Delisting gray wolves from protection from the OESA would not result in or allow any additional commercial, recreational, scientific, or educational activities except as provided by the Commission by permit."

This issue of who, when, where and how much to utilize one or more wolves is not yet before the Commission. These questions are for future consideration. However, gray wolves are not currently utilized and are expanding their population. Therefore, gray wolves are not over-utilized.

This criterium #4 for wolf delisting is met.

**5. Existing state or federal programs or regulations are adequate to protect the species and its habitat.**

The Wolf Status Review, pp. 22 - 25, inclusive, describes state and federal regulations in place to protect gray wolves and their habitat. Existing protections remain. Whether or not wolves are utilized in the future are future considerations for the Commission.

**SUMMARY:**

The criteria for delisting wolves from Oregon's ESA are met since the Wolf Plan criteria as described in ODFW's Biological Status Review for the Gray Wolf dated March 31, 2015.

Hunters may or may not ever get to hunt wolves in Oregon. However, hunters are a useful tool for wildlife managers to keep wildlife populations within the capacity of the land to support that wildlife and to eliminate individuals which may cause damage to cultivated crops, trees and livestock. Hunters want to be part of the solution.

Again, thank you for your time.

Sincerely,  
John R. Putman  
President of the Oregon Hunters Association; Northwest Director, Oregon Hunters Association  
Law Office of John R. Putman  
416 Laurel Ave., Suite #2  
Tillamook, OR 97141  
#503.842.7733  
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November 09, 2015



Members of the Oregon Fish & Wildlife Commission:

The Oregon Chapter of the Foundation of North American Wild Sheep (OR FNAWS) recommends that the Oregon Fish and Wildlife Commission remove the gray wolf from the Oregon Endangered Species Act (ESA). The 2014 Oregon Wolf Conservation and Management Report documents nine packs and eight breeding pairs in 2014, with a minimum population of 77 animals. An additional pack was recently found in the south Snake River Unit, bringing the total to 83 wolves in 10 packs with nine breeding pairs. The first breeding pair was found in 2009. This population growth of a minimum of 80 wolves has taken place in six years! Oregon wolves are no longer endangered!

*President*

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Larry Jacobs	Brent Tannock
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Tom Peterson	Walt Van Dyke
Robert Welsh	

*Website*

[www.oregonfnaws.org](http://www.oregonfnaws.org)  
[www.facebook.com/orfnaws](http://www.facebook.com/orfnaws)

“Putting Wild Sheep  
on the Mountain”

2015 c

Justifications for a change in the Oregon gray wolf endangered status include:

- 1) The northern Rocky Mountain Gray Wolf population in Idaho, Montana and Wyoming is considered recovered and is managed by state rules with the exception of Wyoming.
- 2) Northeast Oregon wolf populations are considered part of the Northern Rocky Mountain Distinct Population Segment.
- 3) Oregon gray wolves interchange with Idaho, Montana and Washington wolves. Genetic “bottlenecks” are not an issue.
- 4) Oregon wolves are expanding rapidly and a breeding pair from northeast Oregon is established in the southern Cascades. Breeding pairs now occur in six Oregon counties.
- 5) The Oregon Department of Fish and Wildlife (ODFW) has an excellent record of restoring extirpated wildlife species including bighorn sheep, Rocky Mountain goats and Columbian sharp-tailed grouse. ODFW also brought cougars back from the brink of extinction to the point many Oregonians would call an over-abundance.
- 6) Idaho’s wolf population growth (from the 2011 Idaho Wolf Monitoring Progress Report) provides an example of what Oregon can expect. In 1997, the Idaho wolf population was estimated to be 71 animals and by 2001 they numbered a minimum of 261 wolves. The increase continued and in 2005 the Idaho wolf population was estimated to be a minimum of 518 wolves. That is an incredible rate of increase for a large carnivore. At the current rate of expansion, Oregon will have over 250 wolves by 2020.
- 7) Costs of management are another concern. According to the 2014 Wolf Report, the wolf program budget allocation for 2013-2015 biennium was \$641,000 with 2 full-time employees. It is presumed this does not include time and expenditures for wolf management by districts inhabited by wolves. **It is our recommendation that wolves be managed like other Oregon carnivores that have flourished under regular state wildlife management.**

We believe that Oregon law ORS 496.176 “Listing Species; Procedure; matters to be considered; periodic review” (see attached) justifies delisting the gray wolf in Oregon. In summary, OR FNAWS recommends that the Oregon Department of Fish and Wildlife Commission remove the gray wolf from the Oregon Endangered List. **Now that the gray wolves are well established in northeast Oregon, it is time for gray wolves to be managed like other game animals.**

Respectfully,

George Houston

President

(1) "Conservation" means the use of methods and procedures necessary to bring a species to the point at which the measures provided under ORS 496.171 to 496.182 are no longer necessary. Such methods and procedures include, but are not limited to, activities associated with scientific resource management such as research, census taking, law enforcement, habitat acquisition and maintenance, propagation and transplantation.

(2) "Native" means indigenous to Oregon, not introduced.

(3) "Species" means any group or population of wildlife that interbreeds and is substantially reproductively isolated.

(4) "Verifiable" means scientific information reviewed by a scientific peer review panel of outside experts who do not otherwise have a vested interest in the process. (ORS 496.95)

**496.172 Commission management authority for threatened or endangered species rules.** In carrying out the provisions of the wildlife laws with regard to the management of wildlife that is a threatened species or an endangered species, the State Fish and Wildlife Commission:

(1) Shall conduct investigations of wildlife species native to this state and shall determine whether any such species is a threatened species or an endangered species.

(2) By rule, shall establish and publish, and from time to time may revise, a list of wildlife species that are threatened species or endangered species. Listed threatened species or endangered species shall be protected as provided in ORS 496.182.

(3) Shall work cooperatively with state agencies that have land management authority or regulatory authority to determine their roles within their statutory obligations in the conservation of endangered species, as described in ORS 496.182 (3).

(4) By rule, shall establish a system of permits for scientific taking of threatened species and endangered species and shall establish a system of state permits for incidental taking of state-designated threatened species and endangered species not listed by the federal government under such terms and conditions as the commission determines will minimize the impact on the species taken. An incidental taking permit or statement issued by a federal agency for a species listed under the federal Endangered Species Act of 1973 (P.L. 93-205, 16 U.S.C. 1531), as amended, shall be recognized by the state as a waiver of any state protection measures or requirements otherwise applicable to the actions allowed under the federal permit.

(5) Shall cooperate with the State Department of Agriculture in carrying out the provisions of ORS 564.105.

(6) Shall adopt administrative rules to carry out the provisions of ORS 496.171 to 496.182 and 496.026. (1987 c.696 §3 (1985 c.690 §3) (1981 c.690 §4, repealed by 1973 c.725 §30)

**496.176 Listing species; procedure; matters to be considered; periodic review.** (1) The lists of threatened species or endangered species established pursuant to ORS 496.172 (2) shall include:

(a) Those species of wildlife listed as of May 16, 1987, as a threatened species or an endangered species pursuant to the federal Endangered Species Act of 1973 (P.L. 93-205, 16 U.S.C. 1531), as amended; and

(b) Those species determined as of May 15, 1987, by the State Fish and Wildlife Commission to be threatened species or endangered species.

(2) The commission, by rule, may add or remove any wildlife species from either list, or change the status of any species on the lists, upon a determination that the species is or is not a threatened species or an endangered species.

(3) A determination that a species is a threatened species or an endangered species shall be based on documented and verifiable scientific information about the species' biological status. To list a species as a threatened species or an endangered species under ORS 496.004 and 496.171 to 496.182, the commission shall determine that the natural reproductive potential of the species is in danger of failure due to limited population numbers, disease, predation or other natural or human actions affecting its continued existence and, to the extent possible, assess the relative impact of human actions. In addition, the commission shall determine that one or more of the following factors exists:

(a) That most populations are undergoing imminent or active deterioration of their range or primary habitat;

(b) That overutilization for commercial, recreational, scientific or educational purposes is occurring or is likely to occur; or

(c) That existing state or federal programs or regulations are inadequate to protect the species or its habitat.

(4) Determinations required by subsection (3) of this section shall be made by the commission on the basis of verifiable scientific and other data after consultation with federal agencies, other interested state agencies, and other states having a common interest in the species and interested persons and organizations.

(5) Any person may petition the commission to, by rule, add, remove or change the status of a species on the list:

(a) A petition shall clearly indicate the action sought and shall include documented scientific information about the species bearing sufficient status to justify the requested action.

(b) Within 90 days of receipt of a petition, the commission shall respond in writing to the petitioner indicating whether the petition presents substantial scientific information to warrant the action requested.

(c) If the petition is found to present such information, the commission shall commence rulemaking.

(d) A final determination by the commission concerning the action requested in a petition shall be provided within one year from the date of receipt of the petition, with the option for an additional 12-month extension of time to complete the listing if the commission determines that limited information or other appropriate considerations require the extension.

(e) If the petition is denied, the petitioner may seek judicial review as provided in ORS 533.484.

(6) The commission may determine not to list a species as a threatened species or an endangered species in any of the following cases:

(a) If the species has been listed pursuant to the federal Endangered Species Act of 1973 (P.L. 93-205, 16 U.S.C. 1531), as amended.

(b) If the species is currently on the list as a sensitive species, or is a candidate species or has been petitioned for listing pursuant to the federal Endangered Species Act of 1973 (P.L. 93-205, 16 U.S.C. 1531), as amended.

(c) If the species has been determined, pursuant to the federal Endangered Species Act of 1973 (P.L. 93-205, 16 U.S.C. 1531), as amended, to not qualify as a threatened species or an endangered species.

(7) Notwithstanding subsections (1) to (5) of this section, the commission shall take emergency action to add a species to the list of threatened species or endangered species if it determines there is a significant threat to the continued existence of the species within the state:

(a) The commission shall publish notice of such addition in the Secretary of State's bulletin and shall mail notice to affected or interested persons whose names are included on the commission's mailing list for such purposes.

(b) Such emergency addition shall take effect immediately upon publication in the Secretary of State's bulletin and shall remain valid for a period no longer than one year, unless during the period the commission completes rulemaking procedures as provided in subsection (5) of this section.

(8) The commission shall periodically review the status of all threatened species and endangered species listed under ORS 496.171 to 496.182. Each species shall be reviewed at least once every five years to determine whether verifiable scientific information exists to justify its reclassification or removal from the list, according to the criteria listed under subsections (3) and (4) of this section. If a determination is made to reclassify a species or remove it from the list, the commission, within 90 days, shall commence rulemaking to change the status of the species.

(9) Notwithstanding the provisions of this section, the commission:

(a) May decide not to list a species that otherwise qualifies as a threatened or endangered species within this state if the commission determines that the species is secure outside this state or the species is not of cultural, scientific or commercial significance to the people of this state.

(b) May not include Branta canadensis leucophaea, commonly known as the Aleutian Canada goose, on the lists of threatened species or endangered species. (1987 c.680 §6, 1985 c.680 §7, 1981 c.670 §20) (496.180 (Amended by 1971 c.688 §5, repealed by 1973 c.722 §139))

**496.182 Protection and conservation programs; compliance by state agencies; rules.** (1) The burden of protecting and recovering threatened species or endangered species can be a significant cost to the citizens of this state and it is therefore the policy of this state to minimize duplication and overlap between state and federal laws dealing with threatened species or endangered species. To this end, nothing in this section is intended to prevent the adoption of cooperative state or federal programs when such programs provide protection for listed species without significant impact on the primary uses of state lands.

(2) At the time the State Fish and Wildlife Commission adds a species to the list of threatened species or endangered species under ORS 496.172, the commission shall establish by rule quantifiable and measurable guidelines that it considers necessary to ensure the survival of individual members of the species. These guidelines may include take avoidance and protecting resource sites such as spawning beds, nest sites, nesting

April 8, 2015

Dear Senator Crapo;

I am a retired wildlife biologist, having worked 26 years for the Idaho Department of Fish and Game (IDFG). I spent 13 years of my career (1971-1984) assigned to the Lochsa Elk Ecology research project. I retired as the Regional Wildlife Manager in McCall. I currently live in Grangeville. During my tenure in McCall and after retirement I kept abreast of the elk situation in the Clearwater. I invested 13 years of my life and career working to restore elk populations in the Clearwater. I am contacting you to express my concern regarding the dismal condition of elk herds in the Clearwater Region. The winter of 1996-97 was an extremely severe winter, resulting in significant mortality in elk herds throughout the region. Eighteen years later many of these iconic elk herds are still severely depressed. The lost revenue and recreational opportunity forgone due to the lack of an action program by the United States Forest Service (USFS) and the Clearwater Basin Collaborative (CBC) is truly a travesty.

Attached I have included an overview of the Clearwater Region elk population and harvest data. This overview compares elk population survey data and elk harvest parameters for the five year period 1992-1996; the five years prior to the devastating 1996/97 winter, to the last five years, 2009-2013. This comparison is for the 13 game management units in the IDFG Clearwater Region that provide over-the-counter general season elk hunting opportunity. There are an additional three game management units in the Region but not included as they are 'lottery-draw' units. A brief summary of this comparison documents and supports my concerns. The average number of elk harvested during the 2009-2013 period is 1,697 less per year. A 2008 IDFG report to the Idaho legislature established the economic value for a harvested elk at \$8,000. When this value is applied to the 1,697 fewer elk currently harvested per year the economic loss to the State and the Clearwater region is staggering; \$13,576,000 per year or \$67,880,000 for the five year period! The previously mentioned legislative report also established a \$127.40 value for each elk hunter day. During the 2009-2013 period there were 70,030 fewer hunter days expended per year. Again, the economic impact is staggering, especially to communities throughout the Clearwater Region; \$8,923,822 per year or \$44,619,110 for the five year period! It should be noted the economic values used in this comparison were computed using '2008 dollar' values.

Region wide elk populations are down 20-40 percent. Populations in the iconic Lolo and Selway zones are nearly 70 percent below the 1992-1996 levels. These dire economic and population conditions are a direct result of the sub-par elk habitat and predation (primarily wolf). IDFG is actively initiating programs to address and lessen the impact of predation. They have created liberal seasons and bag limits, plus reduced the tag fee for the three major predators (black bear, mountain lion and gray wolf). They have also applied aerial wolf control through Wildlife Services. In addition IDFG has restricted elk hunting opportunity in several elk management zones. The USFS and the CBC, on the other hand, have yet to initiate an aggressive habitat restoration program during the past 18 years.

The USFS, in every forest plan beginning in the 1960's, has identified deteriorating elk range as a major elk management issue. However, during the past 50+ years, little progress has been made in restoring the vigor of the seasonal habitats required by elk, especially those habitats not included in the commercial timber base. In short, the USFS is long on planning and very short on implementing any significant elk habitat restoration plan. The IDFG has contributed to the USFS by conducting and providing data from a prescribed fire research project. In addition IDFG provides input on timber and habitat management proposals as well as forest plans and currently has a wildlife biologist on a two year assignment to the Nez Perce-Clearwater Forest.

The CBC is not much better. As I mentioned, it has been 18 years since Clearwater elk populations crashed. I find it irresponsible the CBC has yet to have a significant elk habitat project implemented in the areas experiencing the most significant population declines. This is especially relevant considering the fact the CBC is a spin-off of the Clearwater Basin Elk Habitat Initiative (CEI), the Clearwater Elk Recovery Team (CERT), Elk Summit, and the Elk Collaborative. It should also be remembered in 2001 the Idaho legislature passed Joint Memorial No. 8 supporting the fifty plus national fire plan and stewardship projects developed by the CEI. It is very apparent Clearwater elk were thrown under the bus when the CBC was formed. Considering the thousands of acres of elk habitat in need of restoration, plus the economic losses to the Clearwater region, what is the CBC's rationale for not implementing major elk habitat restoration programs? There have been on-going elk research programs in the Clearwater Region annually since the mid 1960's. No other elk herd in the state has more research and management data at its disposal. Instead of developing a plan from existing data the CBC has chosen to initiate more research studies. More research will not provide the USFS with more tools with which to manage elk habitat. Another "model" is not the answer; "boots on the ground" are what is desperately needed. During the past year I asked Alex Irby, co-chair of the CBC, for an opportunity to discuss my concerns to the CBC group. To date he has never contacted me.

The IDFG is in an awkward position. By state legislative proclamation they are entrusted to manage Idaho's wildlife; however they have very little to no jurisdiction over the habitats the multitude of Idaho's wildlife species require. Thus, they are dependent upon other state and federal agencies, and in many cases, private landowners to provide habitat. It is truly frustrating and inexcusable when a 'multiple use' agency that has a mandate to work with state wildlife management agencies to provide wildlife habitat shrugs its obligation and responsibility. It is especially disheartening as the IDFG has tried for over 50 years to engage and encourage the USFS to restore elk habitat throughout the Clearwater Region.

After 40 years of watching the Clearwater elk habitats continue to decline I am more than frustrated, I am angry. I am writing you in hopes you can "light a fire", encouraging the USFS and the CBC to initiate meaningful on the ground projects rather than conducting more research, developing more models and writing more plans. The USFS has all the tools they need to do the job; they just need to do the job.

Page 3

The lack of initiative by the USFS during the past 18 years, and the CBC since its inception, has resulted in significant forgone economic and recreational opportunity and is inexcusable; the citizens and sportsmen in Idaho and the nation expect and deserve better.

Regards,

Mike Schlegel  
506 S State Street  
Grangeville, ID 83530  
208-630-3001  
[mws1941@gmail.com](mailto:mws1941@gmail.com)

1 Enclosure

cc: Senator James Risch

Representative Mike Simpson

Representative Raul Labrador

Senator Cheryl Nuxoll

Representative Paul Shepherd

Representative Shannon McMillan

Idaho County Commission, Jim Chmelik, Chairman

Idaho Outfitters and Guides Licensing Board, Jake Howard, Executive Director

Idaho Outfitters and Guides Association, John May, Executive Director

Nez Perce-Clearwater National Forest, Cheryl Probert, Supervisor

Idaho Fish and Game Commission, Fred Trevey, Chairman

Idaho Department Fish and Game, Virgil Moore, Director

Idaho Department Fish and Game, Jerome Hansen, Regional Supervisor

Clearwater Basin Collaborative, Alex Irby, Co-Chair

Idaho Outdoor Business Council, Cailin O'Brien-Feeney

Rocky Mountain Elk Foundation, David Allen

The Lewiston Tribune, Eric Barker

The Idaho Statesman, Rocky Baker



November 9, 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.

The Oregon Endangered Species Act was passed by the Oregon legislature as the will of the citizens. It is an expression of the value that the citizens of Oregon have for wildlife in their state, and the understanding of the need to protect those species that are threatened with extinction.

The Endangered Species Act was designed to protect at-risk wildlife with methods and procedures that allow decisions to be based on objectivity, honesty and transparency and, most importantly, based on science. And that is because the values and the objectives of science and scientists are the best, if not the only way, to evaluate the biological status of species-at-risk and what protections are needed.

On the other hand, the Oregon Wolf Plan attempts to manage wolves on a day-to-day basis, and the implementers of the plan are subject to the whims and winds of politics, economics and social pressures. Before the wolf or any at-risk species should be subjected to the day-to-day pressures of politics or to the short-term upheavals of the environment -- without the protections of the Act -- the science must be certain that the species is so resilient, so robust in its numbers and distribution that it can withstand natural pressures as well as the unnatural forces of politics.

The Act requires that all delisting decisions be based on documented and verifiable scientific information, defined by statute and regulation as "scientific information reviewed by a scientific peer review panel of outside experts who do not otherwise have a vested interest in the process." (ORS 496.176 and OAR 635-100-0112.) This has not been done. No expert science panel has been commissioned to assess the Department's report and delisting recommendation.

Numerous scientists, however, who are experts in relevant fields, have sent comment letters to the Commission -- and all of those scientists have found the Department's report and delisting recommendation to be fundamentally flawed and illogical.

Here are a few highlights from the letters:

- The Department's conclusion that wolves are not endangered in Oregon, with only 80-some wolves inhabiting only 12 percent of identified suitable habitat, is untenable.
- The Department's population viability analysis is confused, too simplistic and lacks sufficient detail of important demographic processes to realistically estimate probabilities of "conservation failure" or "biological extinction" over time and therefore the delisting requirements are not supported by the results of the analysis as it was performed.
- The Department's argument that failing to decrease protections for wolves would result in reduced tolerance for the species has been debunked by multiple published, peer-reviewed research papers demonstrating that where protections for wolves have been reduced, tolerance for wolves has decreased.

Have we ever delisted a species with only 80-some confirmed animals occupying only five percent of Oregon's total land mass? Can a species at such paltry numbers residing in such a tiny portion of its suitable habitat withstand the whims of politics and the upheavals of nature?

The answer is no. Science says no. This Commission should say no.

Thank you for this opportunity to address you today. I would be glad to answer any questions you may have.

Sincerely,



Amaroq Weiss, M.S., J.D.  
West Coast Wolf Organizer  
Center for Biological Diversity  
707-779-9613  
[aweiss@biologicaldiversity.org](mailto:aweiss@biologicaldiversity.org)





HOUSE OF REPRESENTATIVES

November 9, 2015

Chair Findley, Director Melcher and Committee,

As State Representative for the North Eastern Oregon Counties that have been increasingly affected by the growing wolf populations, I would wholeheartedly recommend that the provision in the wolf plan to delist, be acted upon.

According to the wolf plan drafted and accepted in 2005, and the testimony given by ODFW expert and head of the wolf program, Russ Morgan, there is absolutely no reason that we should not delist. He has testified many times that the population is increasing just as predicted and that there is little if no chance that the increasing number will decrease if left to themselves.

The wolf program in Oregon is not a new experiment nor is it a trial effort that has not already been well documented in other states. We have science and history from Wyoming, Montana, Idaho, Washington, and now in Oregon with over 10 years of study. This has proven that the wolf population will continue to increase just as predicted and there has now been established a significant wolf population in the three northeastern counties in Oregon.

To not follow through with delisting at this point, or to delay the delisting would be a tremendous disappointment to all who have accepted and submitted to this plan in good faith. The cattlemen in this region have complied with every point of this plan through some very trying years. Through no fault of their own, apart from where they happen to be located in the state, they have been subjected to trials and hardships by this wolf reintroduction. Larger wolf numbers are yet to come in this Northeastern region and will only continue to devastate the number one industry in Wallowa County, which is cattle production.

GREG BARRETO  
STATE REPRESENTATIVE  
DISTRICT 58



HOUSE OF REPRESENTATIVES

The ranchers in Wallowa County have taken the brunt of the reintroduction process. It is time that they see some hope that perhaps in a few years, that as these wolf numbers increase and spread westward across Oregon, that they will at some point be managed in our northeast corner. Although understandably frustrated and vocal, they have also been cooperative and patient, letting the wolf plan be executed as agreed. As Russ Morgan has testified through his assessment of the numbers and the growth, there is now no reason not to delist.

I would urge the committee to follow through with the stated intent and mission of the wolf plan and vote today to delist. Thank you!

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Greg Barreto".

Greg Barreto

State Representative HD 58

Krystal Heitmeyer  
Oregon Cougar Action Team, Assistant Director  
3400 Southside Rd.  
Grants Pass, Oregon 97527

If we delist the wolf, trappers like Stan Thomas who for decades have worked for the Wildlife Services, the State of Oregon, and all of Oregon's counties; will be free to torture and kill animals like he did a coyote pup, the story of which he posted on the internet as a joke.

"I seen this was about August, a big coyote pup was in one of his traps, and I knew by his schedule he was due to come there the next day to run his stuff. So I stopped and went out there and he had the trap nailed to a little tree, about four inches through. It was stapled or nailed to it. So it had about this much chain on the trap. The coyote was goin' around and around. I subdued this pup, took his foot out of the trap and put both feet around a tree and then put the trap back on both feet like he had handcuffs on him and turned him loose. So here he was goin' around and around handcuffed around the tree. I left him there as a joke. (laughed)"

—  
There are now Federal laws against this kind of animal abuse.

Wolf pups and cougar kittens are orphaned when hunted or trapped. Those numbers need to be accounted for in the harvest quotas, as they range in the hundreds if not thousands. Forcing their starving offspring to take livestock or pets, thereby causing conflict where there had been none. It is immoral to kill a mother with dependent young.

Further more, wolves and cougar are both necessary for a balanced ecosystem, as they hunt in different manners and prefer different ecological settings. Killing cougars prevents them from migrating into other States, thereby negatively impacting those ecosystems.

In Yellowstone they found that wolves are killing cougar kittens, and cougar numbers are declining. The entire ecosystem benefits from wolf/cougar kills. For instance a cougar kill supports the food chain benefiting from bears, to wolves, coyote, foxes, badgers, skunks, weasels, raccoons, eagles, ravens, and thousands of insect species. Which in turn feed birds, frogs etc.

Ecosystems are created from the apex predators down. If you cut out the top of the food chain, the entire chain collapses and biodiversity vanishes.

Jayne Miller, Director, Oregon Cougar Action Team  
PO Box 2682, Corvallis, OR 97339  
Testimony, Oregon Department of Fish and Wildlife,  
November 9, 2015

## Apex Predator Guilds and Trophic Cascades

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The most efficient landscapes are collectively managed by the wolf, the cougar and the bear. Apex Predator guild relationships and their collective effects, which have evolved over many thousands of years, are all missing from ODFW's apex predator plans.

Missing also in these plans are the Trophic Cascade effects ODFW's plans have inflicted upon our ecosystems. For example, all throughout the cougar management plan the failing vegetation in the study kill sites are mentioned, yet only one sentence in the cougar plan alludes to vegetation care. Although the ODFW wolf plan discusses trophic cascade issues in two paragraphs, both the wolf plan and the cougar plan do not address the trophic cascade issues behind the plant base decline. Plants are key to the success of any wildlife management plan.

How many cougar, wolves and bear do we need to sustain a healthy ecosystem?

Even though modeling can be used to hypothesize a future population and has a clear benefit, it also has a cost in the sense that a measurement may only be relevant at the scale at which it was taken.

For example, if an Environmental Impact Statement were done using ODFW's current cougar management plan, it would be lacking the historic range variables and carrying capacity of Oregon's natural resources that the cougar managed to sustain without the wolf. Left out of the modeling efforts in both plans

are the historic plant base before the wolf was eradicated and the cougar near extinct. Along with being a politically arbitrary number (reference: Dr. Wielgus peer review 2010, [http://www.orecat.org/dr\\_wielguss\\_cougar\\_peer\\_review](http://www.orecat.org/dr_wielguss_cougar_peer_review)), the modeling of cougar populations was based on irrupted ungulate numbers with no historic grounding. In all of ODFW's apex predator plans, the historic range variables are lacking and population numbers, kill plans, and hypothesis are all based on hyper-abundant numbers of deer and elk human induced populations, that greatly exceeds what Oregon's ecosystems historically supported. Now add livestock across the landscape and you have the perfect storm for ecosystem failure.

We must not kill the wolf, the cougar or the bear until we go back further in history and start from the beginning and design better management plans that includes their apex predator relationship and a more natural population base of large herbivores.

Creating unrealistically low predator populations can collapse the ecology of fear and heavily impact the plant base with high numbers of ungulates. Large native ungulate populations can thus alter Oregon's once vibrant ecology and rural income. Poverty knows no shame like the poverty and shame from a destroyed ecosystem that ODFW apex predator plans are sending us.

We do know from prior studies, that the wolf cannot maintain a balanced ecosystem alone. (Ripple, Beschta, July 2005. Linking Wolves and Plants: Aldo Leopold on Trophic Cascades. BioScience Vol. 55 no. 7) They need the cougar. The lack of updated science in the cougar plan, the flawed cougar population modeling that is based on an irrupted herbivore population, and the predator prey ratios coupled with the cougar harvest increase and this aggressive kill program, could bring Oregon's cougar back near the extinction levels of the 1960's. There is no plan of sustainability in ODFW's cougar

management plan, and no idea how many cougar we need to support the wolf and protect and sustain Oregon's unique ecosystems.

Trophic Cascade is not fully addressed in the wolf plan, and not addressed at all in the cougar or bear plan. The importance of having an ecologically functional apex predator guild is not addressed in either plan. If such information was included, it would be readily apparent to members of the commission that delisting of Oregon's wolves and the existing kill plans for cougar, are not in the best interest of Oregon's ecosystems.

The questionable land ethics behind the decision making of ODFW's cougar management plan has also usurped the democratic process, and also species selected the wolf above the cougar; leaving to the citizens of Oregon the moral responsibility of holding ODFW accountable.

Testimony by Jerome Rosa  
Executive Director for the Oregon Cattlemen's Association

Good afternoon. My name is Jerome Rosa and I am the Executive Director for the Oregon Cattlemen's Association. Today I am asking you, on behalf of our members and based on evidence and recommendations by Oregon biologists, to honor the Oregon Wolf Plan and delist wolves from the Endangered Species listing.

It is key to recognize that the way Oregon wolves are managed will not change with a delisting decision. The Oregon Wolf Plan was agreed upon by multiple parties and it is time to follow through with the next step it dictates.

Oregon ranchers honored their obligations to follow the plan; this is part of the reason that wolves have multiplied in our state. Following the Oregon wolf plan does not come without sacrifice. Our members and their families have suffered many animal losses and endured wolf attacks on animals ranging from calves to family dogs. Still, they have worked through these losses to follow and honor the plan. It would be unfair and unwarranted to these people to not follow through with the state's recommended delisting, which is provided for under the plan.

Oregon's wolf populations have gone from 0 to nearly 100 in six years. An example of this population expansion can be seen by looking at last week's first confirmed attack in Klamath County, which is the first confirmed kill by wolves west of Highway 395. Oregon wolves' population growth is predicted to continue expanding under phase 2, not decline.

Abraham Lincoln once said, "a commitment is what transforms a promise into reality." Oregon ranchers have held up their commitment to the Oregon Wolf Plan. We want to encourage the state to honor their obligation to delist when state biologists have found that the delisting criteria are met. That time is now.



Chairman Finley, Director Melcher, Commissioners:

I am Wally Sykes, a resident of Wallowa County for over 20 years and an advocate for Oregon wolves. I serve on the Wallowa County Wolf Compensation Committee and co-founded Northeast Oregon Ecosystems.

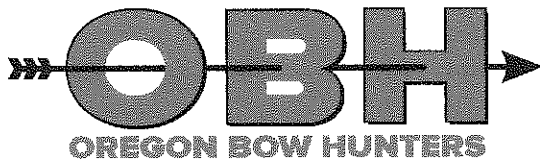
Unfortunately the option to delist coincides with the 5-year review of the Wolf Plan. While some argue that delisting is justified and that wolves will continue to be protected by the Plan, the Plan could be changed during the review.

ODFW has done an excellent job managing wolves since the 2013 settlement of a suit brought by conservationists. It has scrupulously and transparently adhered to the terms and spirit of the Settlement and has shown fortitude in adhering to best science. ODFW swears it will continue to manage wolves in this way...

BUT: the make-up of the Commission can change. Political agendas can change. Right now two of the most knowledgeable and scientifically aware Commissioners are serving expired terms and it's uncertain if they will be renominated. Were things to change, the ODFW could be instructed to kill more wolves, to be quicker on the trigger, to be less transparent. Without state ESA protections, conservationists would have no fallback position from which to protect wolves.

This is why conservationists are alarmed at the delisting. Agreeing to delist with only verbal assurance from the Commission and the ODFW would be irresponsible. Oregonians need to know what the revised Wolf Plan will be before accepting delisting of a confirmed Oregon wolf population of only 81.

We need the Wolf Plan revision before a decision on delisting. Delisting now is premature.



November 9, 2015

Oregon Fish and Wildlife Commission  
Salem, Oregon

RE: Delisting Oregon's Wolves

Chair Finley, Commissioners and Director Melcher,

My name is Craig Starr and I live at 2105 Desiree Place in Lebanon, Oregon. Thank you for this opportunity to comment on behalf of Oregon Bow Hunters (OBH) on the matter of removing Oregon's wolves from the Oregon Endangered Species Act (OESA), also known as delisting.

In the relatively few years since the presence of wolves was first confirmed in Oregon, they have established a strong foothold, and have continually increased in number and expanded their range. Information from your ODFW staff shows conclusively that both the overall population of wolves and the number of effectively breeding wolf packs significantly exceed the minimum goals for delisting as laid out in the Oregon Wolf Plan developed with substantial public input. There is every likelihood that wolves will continue to thrive and expand in Oregon, both in numbers and range, if the Plan is followed and wolves are delisted and managed by your ODFW staff in the manner of Oregon's other wildlife.

OBH urges you to continue to follow the Oregon Wolf Plan and remove wolves from the OESA protections so they can be managed consistently with other Oregon Wildlife.

Sincerely,

A handwritten signature in cursive script that reads 'Craig Starr'.

Craig Starr  
2nd VP Bowhunting and Legislation  
Oregon Bow Hunters

**We fight hard so you can hunt hard!**

61535 S. Highway 97, Suite 5-307, Bend OR 97702 -- [www.oregonbowhunters.com](http://www.oregonbowhunters.com)

To: State Fish and Wildlife Commission/ODFW  
4034 Fairview Industrial Dr. SE  
Salem Or 97302

From: Katherine Brevik  
PO Bx. 10675  
Ptld. Or 97296  
[khbrevik@comcast.net](mailto:khbrevik@comcast.net)  
503.709.7866

Re: Proposed delisting of wolves from the Oregon Endangered Species Act

To: Members of the Commission:

I am an Oregon resident, taxpayer, and small business owner. I STRONGLY OPPOSE DELISTING OF WOLVES FROM THE OREGON ENDANGERED SPECIES ACT.

Studies requested by ODFW from independent scientists have called ODFW's scientific basis for delisting 'fundamentally flawed'.

I was very concerned and disturbed to read in the Oregonian that PRIOR TO THE DEADLINE FOR PUBLIC COMMENT, The ODFW issued a news release stating their recommendation that wolf protections be eliminated. Apparently the request for peer review by scientists and public comment on this issue is merely a formality and the Commission's decisions are made without regard to science or public input.

Oregon's wolf population is tiny: 81 wolves. Delisting the wolves will drastically reduce if not eliminate entirely this only recently (minimally) recovered species

A 2006 Oregon State University Study estimated the state could support 1450 wolves.

Over 3600 wolves have been slaughtered in just 5 states since partial delisting occurred in 2011.

Oregon's protection plan for wolves has been a success: the population is slowly increasing and livestock degradation has decreased.

This commission is tasked with representing ALL citizens of Oregon, not only the livestock and hunting industries.

I request the Commission consider science, the broader issue of wolf recovery in Oregon, and public opinion rather than ceding to pressure from a vocal minority of ranchers and hunters.

Cattle in Oregon: 1,300,000

Sheep in Oregon: 195,000

Wolves in Oregon: 81

(2015 Numbers)

Fred Walasavage

November 9, 2015

Dear Chair Finley and Commissioners:

For the record, my name is Fred Walasavage and I am here to speak on behalf of the Oregon Hunters Association.

My comments support the delisting of the Gray wolf in accordance with the Oregon Wolf Conservation and Management Plan (Plan).

A common misnomer amongst both sides is that once delisted, hunting seasons for wolves will begin. The reality that we all must realize is that hunting will not be allowed for many years to come, if at all.

OHA's primary interest is to ensure that wolf management strategies are in place so that the Department can address problems on ungulates if confirmed wolf predation or pressure from wolves leads to a noticeable reduction or displacement of local populations.

Decisions regarding the delisting must be made using best available scientific data and applied to the five delisting criteria established by the plan. Emotions, threats of litigation, or politics must be ignored.

As you are all aware, most comments that are submitted are not based on an individual's personal knowledge of the science, rather are based on beliefs, propaganda, or canned statements provided by interest groups.

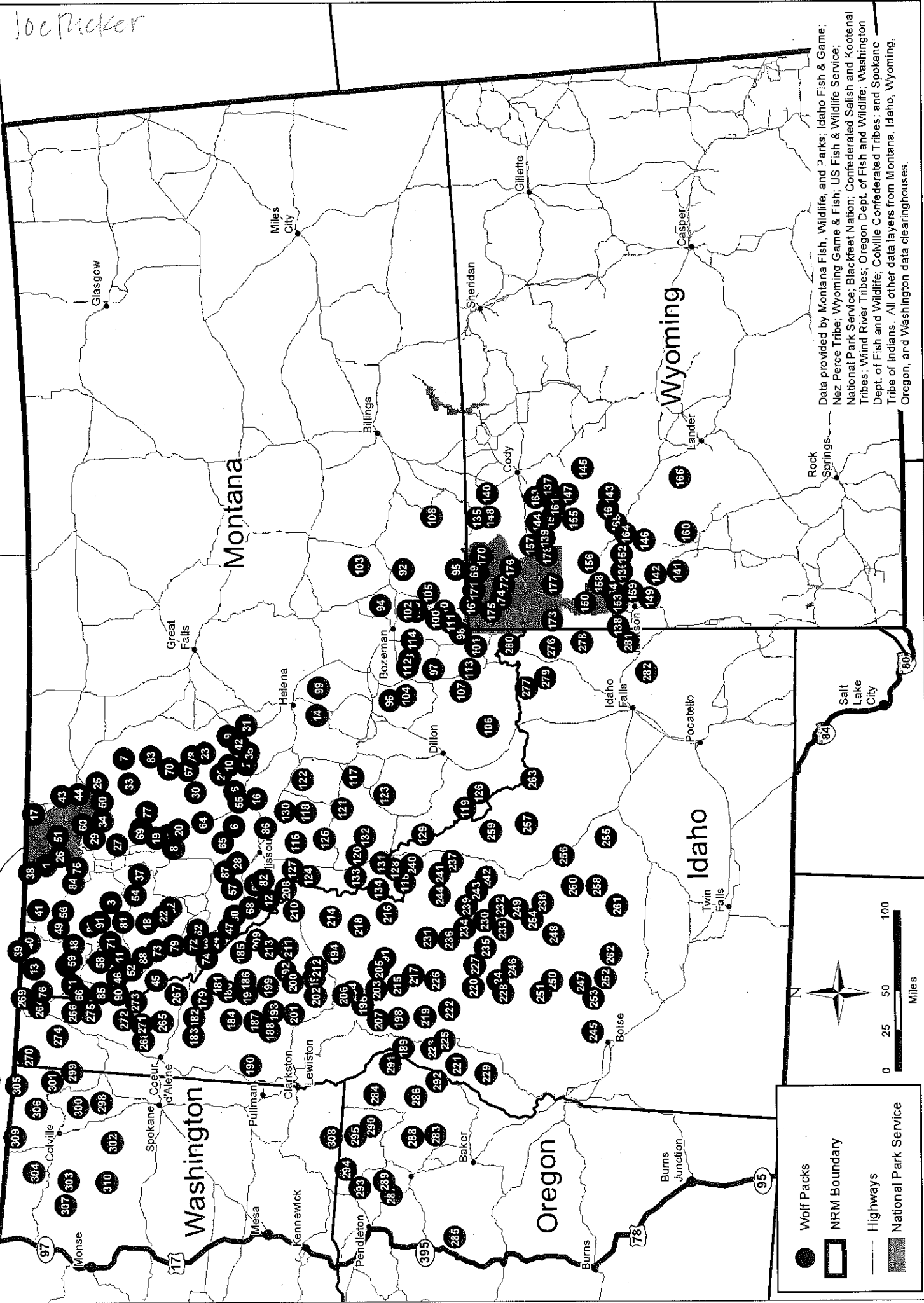
Wolf advocates have a history of "crying wolf". A pattern has been established beginning with the efforts to delist the wolf from the Federal list in other western states. While on board throughout the plan implementation, when it was time to delist, loop holes were identified and litigation pursued.

We are seeing the same pattern here in Oregon. Through a collaborative effort, the Plan was developed and implemented with a high level of success. Very few would disagree. Now when it is time delist, loop holes are once again identified by selected biologists who likely support the wolf coalition and make a living out of derailing such efforts.

Their game plan is to move the goal post. Even though an agreed upon Plan was developed and implemented, when it comes time to move onto the next step in the process, obstacles are placed in the way.

Joe Pucker

Figure 1: Northern Rocky Mountain Gray Wolf Population Area, 2014



Data provided by Montana Fish, Wildlife, and Parks; Idaho Fish & Game; Nez Perce Tribe; Wyoming Game & Fish; US Fish & Wildlife Service; National Park Service; Blackfeet Nation; Confederated Salish and Kootenai Tribes; Wind River Tribes; Oregon Dept. of Fish and Wildlife; Washington Dept. of Fish and Wildlife; Colville Confederated Tribes; and Spokane Tribe of Indians. All other data layers from Montana, Idaho, Wyoming, Oregon, and Washington data clearinghouses.

**OREGON FISH AND WILDLIFE COMMISSION HEARING****NOVEMBER 9, 2015****SALEM, OREGON****TESTIMONY OF RUTH SPETTER IN OPPOSITION TO WOLF DELISTING****1. THERE ARE TOO FEW OREGON WOLVES AT THIS TIME**

According to ODFW staff Oregon has somewhere between 80-100 wolves. Minnesota has more than 374 packs and 2,221 wolves. The minimum required by its laws are more than 1000.

Even Wisconsin and Michigan have hundreds of more wolves than Oregon.

An editorial in Sunday's Oregonian said the same thing. Too few wolves for delisting. Over the past 9 years Oregon's elk and mule deer populations have done well. While there has been predation it has not been massive and there is compensation for proven wolf kills. Further, it is not clear that ranchers are making proven effective methods to avoid wolf predation.

Too few to ensure a healthy, genetically diverse population not subject to sudden extinction. A failure to ensure genetic diversity prior to approving delisting was one of the reasons that the wolves in Wyoming were brought back under federal protection. I did not see a section devoted to this issue. A failure to do so would make it impossible to find that delisting is appropriate at this time and the federal courts have so found.

Finding that Oregon's wolves came from Idaho and may leave Oregon and come back is not, it appears to me, the same as saying Oregon's wolves are part of healthy and diverse community, the standard required by federal case law and good science.

Recognition that interchange between populations is necessary is not the same as finding that it exists here.

Saying that wolf diversity is not a big deal because wolves are willing to go long distances does not support a delisting either. They may go and come back alone and mate with wolves in Oregon, thereby defeating the theory that mobility ensures genetic diversity.

Too few to provide the type of social structure so critical to their way of life and survival.

Too few to inhabit all the potential areas of the state where they might live even though, as the staff report states, there are no impediments to their living there. According to the staff report they inhabit only 12.4% of the areas they might live in Oregon. That is miniscule and provides no support for a need to delist. There are simply too few of them to even live everywhere that they could.

Letters in your record from distinguished scientists describe why this is not the time to delist Oregon's wolves. This is scientific data not refuted by staff reports. See the staff report and its attachments. These comments are made to this Commission at every hearing and, apparently, discounted or ignored.

2. SETTING A LOW BAR AND MAKING IT IS NOT THE SAME AS MAKING A VALID STANDARD

Meeting minimum numbers of breeding pairs does not address genetic diversity.

3. DELISTING HAS BROUGHT SLAUGHTER AND THE REINTRODUCTION OF FEDERAL PROTECTIONS

4. HEALTHY WOLF POPULATIONS ARE IMPORTANT

- Keep other specie numbers from exploding
- Affect the course of rivers
- Tourism
- Natural balance

5. OREGON WOLF NUMBERS ARE INSUFFICIENT TO INDICATE A NEED TO DELIST COMMISSON BEING ASKED TO MAKE DELISTING DECISION BEFORE THE FACTS NECESSARY TO SUPPORT THIS DECISION

The staff report states that breeding pairs can't be established as such until December of this year.

- The federal cases reversed decision to delist when based upon future events not current facts. While staff is no doubt doing what it can to gather data the fact is that the report repeatedly states that critical factors are “undetermined.”
- Every state that has delisted has gone on a killing spree. According to the staff report, human caused mortality was not considered as affecting the existing population by much. In light of what has occurred, this finding cannot provide a basis to support delisting .

6. STAFF REPORT DOES NOT ADDRESS WHAT EFFORTS ARE BEING TAKEN BY THOSE SUPPORTING DELISTING TO PREVENT PREDATION

How big a problem is predation?

The staff report details the numbers killed over this period but not what efforts were made to avoid predation. I'd like to know that. I'd like to know, before delisting Oregon's tiny wolf population, whether tax dollars were spent to help decrease predation which dollars were expended on efforts to decrease predation that were not taken advantage of.

7. DELISTING SHOULD NOT BE A POLITICAL DECISION

- Too long our position has been that wolves are expendable – just rubbish – not important to the landscape or those upon it. We humans have treated many animals, other humans and the earth itself this way
- 
- And, we have been wrong to do so.
- 
- We now know how important wolves are and how important the wild and wild places and animals are to our continuation and very sanity.
- Their lives, as much as ours are sacred. We believe otherwise at our peril. “We are part of the earth and it is part of us ... What befalls the earth befalls all the sons [and daughters] of the earth.” Chief Seattle, 1852.
- We know this now. We must live this way now.
- Wolves have a rightful, important place and there are too few in Oregon to jeopardize them. It is not time for delisting.



October 9, 2015

I am writing this letter to implore the Oregon Department of Fish and Wildlife to delist the non-native grey wolf from state protection. First I must apologize for being unable to attend this meeting personally as I was unable to get away from work obligations.

The first thing I would like to point out is that if you are not a rancher who is being affected by the loss of livestock, or you are not a conservationist sportsman that possesses an Oregon sports pack, you and your opinion does not belong in these meetings or discussions. We are the ones being directly affected by this invasive species that is sport killing our livestock and wild game. These eco-terrorists that do not contribute financially to ODFW, and in fact through frivolous law suits take away from the budget that could help our wildlife. They have no business being allowed into the meetings, much less having their opinions even be considered.

My first encounter with wolves in Oregon came in Douglas County during the 2013 elk rifle season, specifically in the cinnamon butte wilderness area. My wife a veterinarian who has never broken any law much less a game violation, and I became surrounded by several (3 or more) wolves snarling and howling, and at one point my wife leaned over to me and said "you know how I said I wouldn't shoot one of these, I changed my mind." They only left after I fired 2 shots over one of their heads. I could have and in hind sight should have killed at least one of those wolves. We have no doubt should we have been unarmed suffered physical harm. I must point out that this is also an area of "no known wolf activity."

My second encounter was simply finding wolf tracks in January of 2014 on the east side of Mt. Hood. We were in an area with no vehicle access, and there was no human tracks, and we were not within 10 miles of a home. There were 3 sets of 4-5 inch canine tracks in the snow that we followed in a wandering pattern for 2 to 3 miles. We reported this to the local fish and game, but heard nothing in return.

The third encounter was in Harney County, in particular the Steen's unit 69. I was bow hunting with my wife last year when we started hearing wolf howls. My wife and father in law have seen wolves in this particular valley for several years on vacations and antelope hunting. We proceeded to follow the sounds of the barks and howls, until a bawling cow joined the noises. From a ridge we watched 6 wolves ripping a full grown cow apart, and eating her alive. Our shouts and yells did nothing to discourage the attack, and as I only had a bow on my person I was helpless to stop the carnage. We then went back to get a rifle and when we came close enough I fired at the attackers and scared the pack into an unknown location. We then had to dispatch the cow, as she was too far gone to be saved.

I also this bow season had two dispatch another cow that was stuck in a water hole and partially eaten. Now in this instance I cannot say with any level of certainty if it was that pack of wolves or a cougar, but it was without a doubt a large predator that caused the injuries on that cow.

This summer back in the same Steen's area the same pack crossed the road in front of us with the same big black male in the lead, only this time they had two pups following behind. At one point I counted 6 adults and two pups in the pack, but I know there is only 5, and two pups now. One of them based on my diagnosis and discussions with the locals appears to have obtained lead poisoning.

Until you have witnessed these animals ripping apart an animal, or been surrounded by a pack on the verge of attack you are incapable of understanding the destruction and terror that these animals create. It is also not only insulting of the public's intelligence, but extremely misleading to try and say there is only 77 wolves in the state. Especially when you have a dense population of them in the north east and south west, and we are being told that none exist in between. Common sense shows that is absurd, and my own first hand sighting tells me otherwise. If I can name off 3 separate packs other than the documented packs, there is clearly dozens, if not hundreds more wolves in this state than being reported.

After what I have witnessed and experience, I feel I have no choice to shoot every wolf that I come into contact with. Having said that if ODFW does the right thing, even if it not the most popular and politically correct decision I will vow to not take a wolf unless a season is implemented, and will encourage the same of everyone else.

Do what the people that pay and support ODFW wants the ranchers and the conservationists. Oregon must delist this species and start to manage the population before we have no reason to purchase the sports packs, because there is no game left. I ask two things of this department, delist the wolf, and to stop allowing any person to speak at these meetings that is not a rancher, or they possess on Oregon sports pack. Those unwilling to support the department should not have an opinion heard.

Thank you

Kevin Noel

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