

Exhibit B

**Biological status review for the Gray Wolf
(*Canis lupus*) in Oregon and evaluation of criteria to
remove the Gray Wolf from the List of Endangered
Species under the Oregon Endangered Species Act**

Supplemental Consultation

**Correspondence Received
November 2 to November 6, 2015**



Bill Harvey
Commission Chair
bharvey@bakercounty.org

Tim L. Kerns
Commissioner
tkerns@bakercounty.org

Russ Morgan
Wolf Program Coordinator
ODFW
107 20th Street
La Grande, OR 97850
Russ.l.morgan@state.or.us

To Whom It May Concern:

Mark Bennett
Commissioner
mbennett@bakercounty.org

Thank you for giving Baker County an opportunity to make known our beliefs in the matter of delisting gray wolves in Baker County and all of Eastern Oregon.

When the gray wolves were reintroduced into Eastern Oregon, the Oregon Fish and Wildlife Commission promised that when a set number of breeding pairs had been reached, that the gray wolf would then be delisted.

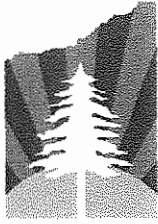
The number has now been reached and we here in Baker County are asking that the ODFW honor their commitment and proceed with delisting the gray wolf in all of Eastern Oregon. By not delisting the wolf, this will continue an undo burden on our livestock producers and public who travel and spend time in our open timber and rangeland with our pets that could be attacked and killed.

I respectfully request that the Oregon Fish and Wildlife Commission delist the gray wolves for Eastern Oregon.

Respectfully,

William "Bill" Harvey, Chairman
Baker County Board of Commissioners





JACKSON COUNTY

Oregon

Board of Commissioners

Rick Dyer (541) 774-6118
Doug Breidenthal (541) 774-6119
Colleen Roberts (541) 774-6117
Fax: (541) 774-6705

10 South Oakdale, Room 214
Medford, Oregon 97501

October 26, 2015

Via: U.S. Postal Service
Email: russ.l.morgan@state.or.us

Mr. Russ Morgan, Wolf Program Coordinator
Oregon Department of Fish and Wildlife
107 20th Street
La Grande, OR 97850

Re: Comments on Biological Status Review for the Gray Wolf and Evaluation of
Criteria to Remove the Gray Wolf from the List of Endangered Species under the
Oregon Endangered Species Act

Dear Mr. Morgan and the Oregon Fish and Wildlife Commission,

The Board of County Commissioners for Jackson County appreciates this opportunity to comment on the biological status review for the Gray Wolf and the evaluation of the criteria set forth in ORS 496.176 for the delisting of the Gray Wolf from the list of endangered species under the Oregon Endangered Species Act.

The Board of County Commissioners has reviewed the updated biological status review for the Gray Wolf and supports Option 1, the delisting of the Gray Wolf throughout Oregon. The Gray Wolf population in Oregon, including the wolves located in Jackson County, has grown rapidly over the past five years. As such, and evidenced by the Oregon Department of Fish and Wildlife's biological review and analysis, Oregon's Gray Wolves are no longer at risk of extirpation.

As set forth in the Oregon Department of Fish and Wildlife's analysis, all the evidence supports a finding that the five criterion set forth in ORS 496.176 are satisfied for the delisting of the Gray Wolf throughout Oregon as proposed in Option 1. Moreover, as noted in ODFW's analysis of criterion 5, there remain ample protections for the Gray Wolf in state and federal law. Given the remarkable recovery the Gray Wolf has made in Oregon, there is simply no longer a purpose in its listing as endangered under the Oregon Endangered Species Act.

Letter to ODFW re: Gray Wolves
October 26, 2015
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On behalf of Jackson County, thank you for your thorough analysis of this important issue. In accordance with the scientific analysis supporting Option 1, we believe that delisting the Gray Wolf throughout Oregon is the most appropriate course of action.

Sincerely,

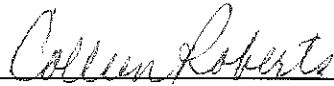
JACKSON COUNTY BOARD OF COMMISSIONERS



Doug Breidenthal, Chair

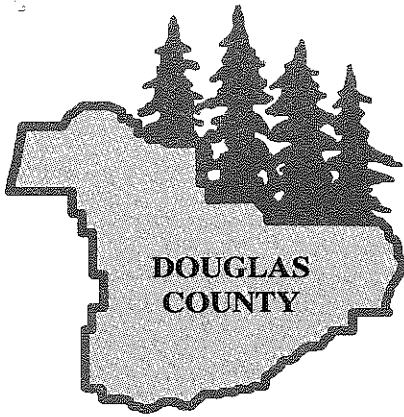


Rick Dyer, Commissioner



Colleen Roberts, Commissioner

:ld



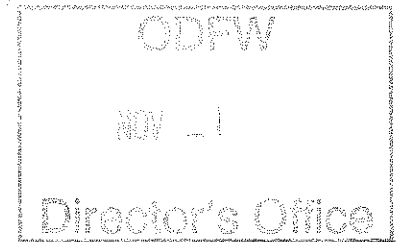
DOUGLAS COUNTY BOARD OF COMMISSIONERS

CHRIS BOICE SUSAN MORGAN TIM FREEMAN

1036 SE Douglas Ave., Room 217 • Roseburg, Oregon 97470

October 26, 2015

Oregon Fish and Wildlife Commission
4034 Fairview Industrial Drive SE
Salem, OR 97302
(503) 947-6000



In re: November 9, 2015 Status of Gray Wolves Agenda Item

Dear Commission Members:

The Douglas County Board of County Commissioners appreciates this opportunity to express its concerns relative to the status of the gray wolf under the Oregon Endangered Species Act.

In adopting the Oregon Wolf Conservation and Management Plan (“Wolf Plan”) the Oregon Fish and Wildlife Commission (OF&W) or (“Commission”), made a commitment to the citizens that it would respond when the specific criteria were triggered. The Wolf Plan established a sequential three-phased management strategy wherein specific actions were triggered once the objectives of any specific phase were met.

As part of the first phase, the Wolf Plan specified that the “rulemaking process to consider delisting will be initiated when the conservation population objective for Eastern Oregon is met. (Wolf Plan, p. 26). The Phase I conservation population objective was met as of December 31, 2014. Unfortunately, for our constituents, neither the Department nor the Commission followed through with its commitment to the citizens of Oregon that it would initiate delisting in a timely manner once the transition to Phase II occurred.


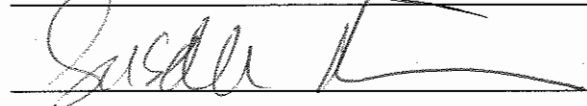

The Phase I population objective of four “breeding pairs” for three consecutive years represented the best scientific judgment as to the number of wolves that ensured the natural reproductive potential of the gray wolf population is not in danger of failure. (Wolf Plan p. 28). This objective was met for the Eastern Oregon population. As the recent discovery of new wolf packs and individual wolves indicates, the gray wolf in Oregon is expanding.

Recent observations of gray wolves in Douglas County and other Western Oregon regions indicates that it will not be long before the objectives for Western Oregon are met as well.

Under all five of the standards for delisting under ORS 496.176, the Eastern Oregon population of gray wolves warrants delisting and no longer requires the protection of the Oregon Endangered Species Program.

The OF&W Commission made a commitment to the citizens of Oregon that it would initiate delisting once there were four breeding pairs in Eastern Oregon over three consecutive years. Commitments were made that management strategies would change once the population is delisted and the Phase II program is implemented. It is important for the citizens that the management approaches are consistent with the challenges that come with the increasing population of gray wolves.

Respectfully submitted
Board of County Commissioners
Douglas County, Oregon

Roxann B Borisch

Subject: FW: Comment on the necessity of Wolf Recovery Plan modification and retention on OR ESL

From: Michael McLaughlin [mailto:mjm1182@humboldt.edu]

Sent: Monday, November 02, 2015 2:32 PM

To: russ.l.morgan@state.or.us

Cc: odfw.commission@state.or.us

Subject: Comment on the necessity of Wolf Recovery Plan modification and retention on OR ESL

Russ Morgan, Wolf Program Co-ordinator:

Thank you for your years of dedication to successful wolf recovery, and your sharing of expertise gained with other managers, programs, and biologists.

I strongly feel that Oregon should use wolf recovery as an opportunity to advance conservation science and population ecology. Past management in other states have not contributed, but are instead presently involved in actively preventing, both more complete understanding of those sciences, and full recovery of an endangered species.

I hope here to address a couple areas in which science may show that the plan requires amendment

1. 1. Experience with *C.l. baileyi* and *Canis rufus* have shown that wolf population viability over longer time frames, is strongly dependent on in-migration/ dispersal. Although Oregon's *C. lupus* re-entered the state with far higher genetic variability, it is clear that the Wolf Project will need to monitor the allele variation over the foreseeable future.

2. 2. This issue appears important, as the SW population is extremely small, and due to Idaho's attempt to down-manage its source population to extremely low levels unlikely to maintain sufficient heterozygosity, major modifications to the Oregon plan may be in order. Several reasons for this modification are evident:

a. Should any source populations be shown to be trending toward loss of genetic variation, this will narrow the pool, pushing all populations dependent on the upstream sources toward inbreeding as well.

b. This will strongly affect the new/incipient California population, and thus trigger the Plan's requirement to implement agreement with CA which may involve necessary returns to earlier management Phases. CA population is now dependent upon only two families – 4 reproducing individuals; this, in light of the slow dispersal which has occurred so far across the Strawberry/Ochoco corridor, is indicative of the danger of early removal of protection.

c. The present lengthy single dispersal corridor, and the uncertain effects of the ongoing population reduction occurring in ID, may thus require that any MOUs or agreements with Idaho be modified in light of the induced trend occurring in ID, or Northern Rocky DPS.

3. 3. Due to the dangers obvious in holding populations (*either metapopulation in Northern Rockies DPS, or any adjacent state*) to low levels (*please see my Oct. 15 comment to the*

Commission. The inverse density dependence of such small populations have been modeled, although not yet for an annually reproducing monogamous species in which only a portion of the population is involved in reproduction. Because of those additional constraints inherent in the species added to the low reproducing pack numbers triggering management Phase change, might those management numbers be set far too low?), management goals which might prevent populations from escaping the inverse dependence.

4. Phase 3 management has included management as a "game" species. In my Oct. 15 comment to DFW Commission I mentioned recent scientific findings countering any validity of the idea of the wolf as a viable game species. Such management by hunting has been shown to be counterproductive to avoidance of wolf/human conflicts. Please refer to the information included on this issue mentioned in my comment.
5. Behaviorally, the intense management of Idaho wolves will certainly result in a great proportion of young dispersers having lessened natural predation skills, and increased livestock depredation may be expected, should ID management continue on this course. While this issue occurs due to Idaho (mis)management, Oregon will suffer from the consequences. Developing new agreements with ID, rather than the proven nonviability of lethal management, will allow increased Oregon social tolerance as well as the re-establishment of a viable connected Oregon wolf population.

Because you've conducted oversight of the Recovery Plan with clarity and integrity, you've established considerable trust. Modification of the Phases to reflect real recovery toward MVP through Endangered, Threatened, Vulnerable statuses, preventing the dangers inherent in insufficient goal population numbers, would further enhance both scientific understanding of the species, and viability of the Plan in protecting the species in the long term.

It is clear that a re-analysis of gene flow over time is of great value; extending the Plan through retaining Endangered Status until a numerically larger goal for Phases 2 and 3 is created as criterion, aligns with a proper precautionary principle.

So, due to the fact that it may be administratively easier to recommend Plan modification before delisting, than to return to earlier Phases in cycles evoking public discord, Endangered Species listing retention while incorporating (*and even assisting in development of*) newer scientific findings which have occurred since the Plan's inception, may be the wisest course.

Sincerely,

Michael McLaughlin



County Court of Grant County
Judge Scott W. Myers
Commissioner Chris B. Labhart
Commissioner Boyd Britton

November 3, 2015

Oregon Fish and Wildlife Commission
4034 Fairview Industrial Drive SE
Salem, OR 97302
(503) 947-6000

Re: Oregon Fish and Wildlife Commission Agenda Item on Status of Gray
Wolves

Dear Commission Members:

On behalf of the Grant County Court and the citizens of Grant County, I appreciate this opportunity to express our concerns relative to the status of the gray wolf under the Oregon Endangered Species Act.

The gray wolf is now well established in Grant County with both known packs and numerous reported sightings of individual wolves. Based on the comments we have received, the number of wolves is greater than officially recognized by the Oregon Department of Fish and Wildlife ("Department"). While State policy was to notify ranchers of wolf presence, this is not always happening for local ranchers are experiencing collared wolves in pastures yet never received notice from the Department.

In adopting the Oregon Wolf Conservation and Management Plan, the State of Oregon made a commitment to the citizens that it would implement the Plan, not only by providing appropriate notice to landowners but also by timely responding when the specific population criteria were triggered.

The foundation of the Plan was the three-step management strategy wherein specific actions were triggered once the objectives of any specific phase were met.

The State made a commitment that the:

"rulemaking process to consider delisting will be initiated when the conservation population objective for Eastern Oregon is met." (Plan, p. 26).

As the public press releases and staff reports document, the Phase I conservation population objective was met as of December 31, 2014. While the State made a commitment to timely initiate delisting, unfortunately this process was not initiated and the Commission is still debating whether to follow the Plan and the administrative rules implementing the Plan. During this delay there have been real time adverse impacts to citizens of Grant County.

The Phase I population objective of four "breeding pairs" for three consecutive years represented the best scientific judgment, as to the number of wolves which ensured the natural reproductive potential of the gray wolf population was not in danger of failure. (Plan p. 28). This was not an arbitrary number; rather it represented the best science and was supported by Federal biologists familiar with the gray wolf life history and expansion. As often quoted these biologists concluded that by every biological measure the Northern Rockies DPS wolf population – which includes Oregon – is fully recovered. They were of the opinion that the gray wolf is not now endangered nor is it likely to be in the immediate future. (Mike Jimenez, March 29, 2013). Any decision to retain the gray wolf on the Oregon endangered species list would not be a biological decision rather it would be solely a political decision.

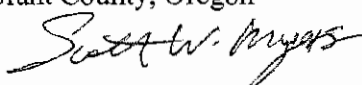
Further, as the recent discovery of new wolf packs and individual wolves indicates, the gray wolf in Oregon is expanding. Under all criteria for delisting under ORS 496.176, the Eastern Oregon population of gray wolves warrants delisting and no longer requires the protection under the Oregon Endangered Species Program.

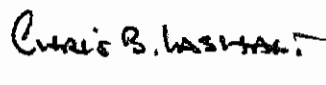
The OF&W Commission made a commitment to the citizens of Oregon that it would initiate delisting once there were four breeding pairs in Eastern Oregon over three consecutive years. Notwithstanding the burdens placed on the local community, the citizens of Grant County have lived up to what was expected of them under the Plan. With the expanding population we need the additional management tools adopted for Phase II. Delisting allows the State to implement more efficient, sustainable, and cost-effective programs that allow the maintenance of the fully recovered wolf population while providing tools to minimize conflicts. It is important for all of the State that the management approaches are consistent with the challenges that come with the increasing population of gray wolves.

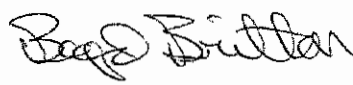
The Grant County Court encourages the Oregon Fish and Wildlife Commission to delist the gray wolf.

Respectfully submitted,

Grant County Court
Grant County, Oregon


Scott W. Myers
County Judge


Chris B. Labhart
County Commissioner


Boyd Britton
County Commissioner