Exhibit D

Public Testimony Received at Meeting
October 7, 2017

Roxann B Borisch

From:	Scott Beckstead <sbeckstead@humanesociety.org>
Sent:	Tuesday, October 04, 2016 3:17 PM
To:	odfw.commission@state.or.us; Curt Melcher
Cc:	Michelle Tate
Subject:	Oregon Wolf Management Plan
Attachments:	HSUS-OR-WolfComments-2016Plan-Final.pdf

Dear Chair Finley, Commissioners, and Director Melcher:

Attached please find our comments on the Oregon Wolf Management Plan. I look forward to addressing all of you at the meeting on Friday. Thank you for your continued service to the people and wildlife of Oregon.

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THE HUMANE SOCIETY
OF THE UNITED STATES

Celebrating Animals | Confronting Cruelty

October 4, 2016

Mike Finley, Chair
Oregon Fish and Wildlife Commission
Curt Melcher, Director, ODFW
4034 Fairview Industrial Drive SE
Salem, OR 97302
odfw.commission@state.or.us

Re: 2015 Wolf Conservation and Management Plan Review

Dear Chair Finley, ODFW Commissioners and Director Melcher:

On behalf of The Humane Society of the United States (HSUS) and our supporters in Oregon, I am writing regarding the Wolf Conservation and Management Plan review process. The HSUS shares several concerns about the Plan and the review process that are outlined in a September 23, 2016 letter submitted to the Oregon Fish and Wildlife (ODFW) Commission (Commission) by Cascadia Wildlands, Center for Biological Diversity, Endangered Species Coalition, Oregon Wild, and Northeast Oregon Ecosystems (hereinafter "Coalition Letter").

As our previous communications to ODFW indicate, The HSUS strongly believes that Oregon's gray wolves (*Canis lupus)* should not have been removed from the state's endangered species list. With a population of just over 100 animals, wolves have not recovered and remain absent from most of their suitable range in the state. The future of the species in Oregon remains uncertain. As such, we urge the agency to heed the sentiments expressed in the Coalition Letter ensuring that the Plan is appropriately cautionary and the review process sufficiently open to public input.

In the Coalition Letter, the organizations reiterated the need to maintain the components of the Plan "that have demonstrably worked (clarity, transparency, defensible and enforceable standards, a focus on conflict prevention and conservation, and only killing wolves as an option of last resort)." The HSUS strongly agrees that the Plan should maintain such criteria and address the components of the plan that have not helped promote wolf recovery, such as clarifying Phase 3, which has been interpreted by some as allowing for a trophy-hunting and trapping season on this highly-imperiled species in Oregon in a

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misguided, unscientific effort to maintain surplus ungulate populations for hunters and to address conflict with the livestock industry. We further concur that ODFW should ensure public transparency surrounding poaching and livestock losses, and vigorously enforce against wolf poaching.

I. Killing Wolves will not Resolve Declining Ungulate Populations:

Prey populations are in decline across the West because of a myriad of anthropogenic causes and only rarely can they be attributed to wolves and other native carnivores. Therefore, the ODFW must use a scientifically-based approach to improving ungulate herd health that does not unfairly target the state's native wolves. We concur with the suggestions put forth in the Coalition Letter, that "taking meaningful action to more seriously enforce poaching, overharvest by humans, habitat degradation, connectivity issues, vehicular collisions, and other threats" can significantly improve the health of ungulate herds," particularly considering that "[i]llegal hunting accounts for as many deer deaths as legal hunting (which combined represents 20 times the impact on deer herds as native wolves)."

Not only does the best available science demonstrate that predator control doesn't boost ungulate populations, in several studies of predator-prey interactions, biologists routinely have found that human hunters, weather and climate change represent the greatest negative effects on ungulates (Vucetich et al. 2005, Wright et al. 2006, Boertje et al. 2010, Pierce et al. 2012, Forrester and Wittmer 2013, Monteith et al. 2014, Prugh and Arthur 2015). Wolves actually keep ungulates healthy (by removing the sick, weak, and old animals) (e.g., Mech 2007), limit starvation and die-off by mediating stochastic events such as prolonged drought or deep snow on ungulate populations (Wright et al. 2006, Mitchell et al. 2015). The scientific consensus for the last several decades has generally concluded that carnivores modulate prey populations and make them more vigorous (Murie 1940, Leopold et al. 1964, Logan and Sweanor 2001, Peckarsky et al. 2008, Callan et al. 2013, Mitchell et al. 2015), including removing the sick and weak animals which would die of other natural causes anyway (Mech 2007, Krumm et al. 2009, Monteith et al. 2014). That is why predator-control schemes are an unreliable way to increase the abundance of ungulates (Mosnier et al. 2008, Bishop et al. 2009, Hurley et al. 2011). Ironically, human hunters are responsible for the decline of large-bodied mammals (Darimont et al. 2009, Palazy et al. 2012, Braczkowski et al. 2015, Ripple et al. 2016). For these reasons, the ODFW must not assume that by killing wolves, ungulate numbers will grow.

II. Wolves Kill Few Livestock; Commonsense Non-Lethal Practices can Limit Damage:

More than 99% of unwanted livestock losses come from respiratory, digestive, or birthing diseases, injury, theft problems and weather events such as too much snow, fire or lightning. Data from the U.S. Department of Agriculture show that wolves (and all other carnivores put together, including coyotes, cougars, dogs, and bears) take less than 1% of all annual livestock inventories (see livestock discussion in Keefover 2012).

In a study based upon a review of 25 years of livestock loss data from wolves, authors found that with increased wolf persecution, livestock losses increased the following year (Wielgus and Peebles 2014). That's because when disrupted, wolf families adapt, move, split up, increase reproduction – and then they may kill even more livestock. Treves et al. (2016) examined more than 100 peer-reviewed studies and found little evidence that killing native carnivores such as wolves reduced livestock losses, but rather the scientific evidence does demonstrate that certain nonlethal conflict prevention methods effectively help prevent livestock losses.

As ODFW Commission moves forward with its Wolf Plan review process, the agency should ensure that the Plan and its recommended actions are consistent with the latest scientific findings on non-lethal protections for livestock (Andelt 1996, Shivik et al. 2003, Treves and Karanth 2003b, a, Baker et al. 2008, Morehouse and Boyce 2011, Treves et al. 2011). We cannot overemphasize the fact that all livestock loss claims should be investigated and verified and not taken at face value (Roy and Dorrance 1976, Neimeyer 2010) because livestock growers are incentivized to exaggerate their losses (Baker et al. 2008, Neimeyer 2010). Even in states where wolves are far more widespread, livestock losses are nominal. But to reduce them further, the ODFW must institute non-lethal controls, including employing range riders and insisting on removal of livestock carcasses (Morehouse and Boyce 2011) before wolves are permitted to be killed (and only as a last resort), and expressly forbidden on public lands.

III. Wolves are not Resilient to Human Persecution; "No" to Trophy Hunting or Trapping:

Wolves are highly susceptible to persecution (Creel and Rotella 2010, Bryan et al. 2014, Wallach et al. 2015, Ripple et al. 2016). Large-bodied carnivores are sparsely populated across vast areas, invest in few offspring, provide extended parental care to their young, females limit reproduction and social stability promotes their resiliency (e.g., Weaver et al. 1996, Stoner et al. 2006, Wielgus et al. 2013, Creel et al. 2015, Wallach et al. 2015). Human persecution affects their social structure (Stoner et al. 2006, Darimont et al. 2009, Miller et al. 2011, Peebles et al. 2013, Bryan et al. 2014, Wallach et al. 2015), but harms their persistence (Darimont et al. 2015). The effect of human persecution is "super additive," meaning that hunter kill rates on large carnivores has a multiplier effect on the ultimate increase in total mortality over what would occur in nature due to breeder loss, social disruption, and their indirect effects including increased infanticide and decreased recruitment of their young (Creel and Rotella 2010, Ausband et al. 2015, Darimont et al. 2015). Hunting wolves may have detrimental effects on the fitness of individuals, change packs' evolutionary potential, and increase the risk for population extinction (Bryan et al. 2014, p. 8). Biologists suggest that now more than ever, wolves need more federal protections to prevent their destruction (Bruskotter et al. 2010, Houston et al. 2010, Bergstrom 2011, Bruskotter et al. 2011). The ODFW has a public trust obligation to conserve wolves for all stakeholders and to ensure their long-term conservation. Because wolves are readily extirpated, the ODFW must limit persecution of them.

To reiterate : The HSUS is strongly opposed to any trophy hunting or trapping of wolves for recreational purposes. In states where these activities are allowed, hunters and trappers have taken to social media to show themselves subjecting wolves to horrific abuse, including

deliberate torture.[1] These activities are against the values of the vast majority of Oregonians, who want all animals, including our apex predators, treated with respect and with humane values in mind.

IV. Most Americans Highly Value Wolves; ODFW Must Work Towards Wolf Co-Existence to Ensure their Long-term Conservation:

Since first measured in 1978, the public's values towards wolves has grown substantially more positive with 61% valuing wolves compared to 17% of the public holding them in low esteem (George et al. 2016). Those negative few are "'drowned out'" by the vast majority of Americans who hold a growing concern for animal welfare, which should translate into innovative wildlife management (George et al. 2016).

Because of declining available habitat necessary for large carnivores, co-adaption between large carnivores and humans must occur, if carnivores are to persist; that means that humans must be willing to share habitat and tolerate the small level of risk they pose (Carter and Linnell 2016). Humans must curb their own "hyperpredation" of other species and their habitats (Darimont et al. 2015, Chapron and López-Bao 2016).

V. Conclusion:

Wildlife management, as a contemporary institution, was founded with the intention to carry out the public trust doctrine asserting that wildlife is owned by no one and held in trust by governments for the benefit of present and future generations (United States Supreme Court in a 1842 ruling, Martin v. Waddell, 41 U.S. 234). Protecting Oregon's wolves for future generations depends on a Wolf Plan and review process that are both transparent and appropriately cautionary.

The HSUS is strongly opposed to any plans that would include trophy hunting or trapping of wolves and we urge ODFW to require livestock operators to utilize nonlethal protocols as a first resort in resolving conflicts.

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[1] https://www.facebook.com/WolfCulinaryInstitute/?fref=ts; http://www.care2.com/news/member/123562948/3671112; and https://ourwisconsinourwildlife.wordpress.com/2014/08/17/gut-shooting-wolves-conflicts-of-interest-and-the-ties-that-bind-just-another-day-in-wisconsin/.

Thank you for considering our views on this issue. Please do not hesitate to contact me if I can be of further assistance to you on this or other matters.

Sincerely,

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Blue Mountains Biodiversity Project, League of Wilderness Defenders
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Oregon Department of Fish and Wildlife Commission
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RE: Comments on the Oregon Wolf Plan Revision 2016

October 6th, 2016

Dear Commission Members,

The Blue Mountains Biodiversity Project (BMBP) has been working to protect and restore the ecosystems of the Blue Mountains and Eastern Oregon Cascades since 1991. Our work area includes the Malheur, Ochoco, Umatilla, and Deschutes National Forests, and occasionally the Wallowa-Whitman National Forest. BMBP is based in Fossil, Oregon, and has staff and supporters that live in eastern Oregon, including our Director. We view this as an important opportunity for the ODFW Commission to understand that many people in Eastern Oregon value wolves and other native wildlife. We regularly work with many eastern Oregonians who have strong environmental values and support strong protections for wolves. It's also an opportunity to remind the agency they represent all Oregonians, and that the public overwhelmingly supports wolf recovery. Blue Mountains Biodiversity Project is commenting on behalf of over a thousand supporters. Blue Mountains Biodiversity Project is a project of the League of Wilderness Defenders and is a 501c3 non-profit.

Blue Mountains Biodiversity Project field checks every major timber sale, as well as some selected grazing allotments, in our work area. Every summer, with the help of dozens of volunteers, we survey thousands of acres of public lands. Based on the information we collect in the field, we work to stop or significantly modify ecologically destructive logging, road building, livestock grazing, and other projects on public lands. We prioritize the protection of biodiversity, mature and old growth forests, water quality, and areas of high ecological quality and importance. We regularly camp for weeks on end in areas where wolf packs reside, and in areas where wolves have not yet recovered. We have seen wolf sign, but have not yet seen a wolf. We do not view wolves as threats to humans, despite the fact that for many years we have been camping and field checking regularly, and for extended periods of time, in areas occupied by wolves. What we do see as a threats are the countless free-roaming cattle in known wolf territories. We take note of the detrimental impacts of cattle on the landscape, and have ample documentation of such impacts. Severe overgrazing is common in many areas of our National Forests, and continues to be extremely problematic to streams and riparian areas, as well as other ecologically important areas. Overgrazing forces cattle, elk, and deer to explore deeper into the forest seeking alternative food sources, which in turn causes them to be more spread out and vulnerable to predation.

BMBP views wolves as a vital and necessary component to ecosystem health functions of the Oregon forests, and native gray wolves belong in these ecosystems. BMBP supports revision to the management plan that include the following taken into consideration:

Carry forward the parts of the Wolf Plan that worked to reduce conflict and recover wolves, and fix parts of the plan that fell short. Non-lethal controls are effective, and should be an integral part of the Wolf Plan. We ask that ODFW focus on transparency, clear defensible definitions, and enforceable standards to prevent conflict. Research shows that killing wolves is not an effective strategy for reducing livestock depredations (1), nor does it increase social acceptance of wolves (2). Non-lethal measures should be required, with clear and enforceable guidelines. Ranchers should be required to remove livestock from active den sites, and not be allowed to graze livestock near these areas. BMBP urges the ODFW to honor your mission, and strengthen Oregon's Wolf Conservation and Management Plan.

Stronger protections are needed to ensure wolf recovery. Wolves are still too limited in numbers and in distribution to be considered "recovered", or to maintain sustained populations. We are concerned that shrinking populations in neighboring states, combined with recent delisting in Oregon will not ensure sufficient genetic diversity or connectivity. Particularly in light of threats from poaching and other sources of mortality, our small wolf population continues to be in jeopardy of extirpation. BMBP supports the return of wolves to Oregon and their continued recovery to move beyond their current range and into their historic range. Adding stronger protections within all three phases of the Plan are necessary to achieve recovery of the current population.

Strong protections are needed to ensure public acceptance of wolves. In areas where killing wolves is legally acceptable, public support of wolves may decrease (2). State-sanctioned killing of wolves actually increases controversy and discontent about wolf presence. We are opposed to killing wolves, especially on public lands. We ask the ODFW to consider wolves as an integral part of ecosystem health.

Killing wolves harms wolf pack structure, which may cause young, inexperienced, or immigrating wolves to be more likely to prey on livestock. In addition, the pack may dissolve, or reproduction can be negatively affected-- potentially jeopardizing recovery in a population with very few breeding pairs (3).

Public hunting of wolves is unacceptable. Some private interests see killing wolves as the solution to problems, and are calling for a weak wolf plan that makes killing wolves easier. Oregon should learn from its own past and from other states. Killing wolves does not resolve conflict, and research has shown that other wolves or coyotes will fill that niche, as long as there is a food source present. We strongly urge the ODFW to reject any form of wolf hunting, *de facto* or otherwise. It is inappropriate and irresponsible for private citizens to be given authorization to kill wolves.

We urge ODFW to include stronger conservation values in the Wolf Plan. We ask ODFW to place increased value on wolves for their important ecological roles. Wolves should not be killed for the benefit of private interests, especially on public lands. The State is responsible for protecting wolves in the public trust, for all Oregonians. Wolf conservation is important for all citizens, and should not treated as an issue limited to private or local business interests. We also ask the ODFW to refrain from using wolves as political bargaining chips to mediate political and economic conflicts. ODFW went forward with the recent delisting of wolves, despite overwhelming public outcry, and contrary to scientific opinion. We hope that ODFW acts in the listens to the public, and includes stronger protections for wolves in the revised plan.

Oregonians have been clear in their overwhelming support of wolves, and want strong protections in order to ensure wolf recovery. The public favors wolf recovery. Public polls show that over 2/3 of

Oregon citizens support wolf recovery. This is also true of public polls in Washington and California, and nationally. In addition, public support of the Endangered Species Act continues to remain strong (4, 5, 6). State and federal agencies are obliged to uphold the law, act in the public trust, and preserve natural resources, including wolves, for current and future generations.

Wolves fill vital roles in ecosystems. Wolves prevent damage to streams and riparian habitats from ungulates, and so play a critical role in the restoration of these areas. This, in turn, helps to support healthy populations of fish, birds, and riparian vegetation. Wolves can release rodent populations from coyote pressure, which in turn sustains healthier populations of certain birds of prey (7). Studies have also shown that the presence of wolves contributes to healthier soils (8), and may buffer the negative effects of climate change on ecosystems (9).

Non-lethal works! The Wood River Project in Idaho, run by Defenders of Wildlife is an example of successful coexistence of livestock and wolves. The Wood River Project has been going strong for eight years, and uses non-lethal management to protect more than 25,000 sheep that graze annually on the Sawtooth National Forest. It has one of the highest concentrations of wolves and livestock sharing the same landscape, yet the project area has the lowest rate of loss due to wolf depredations across the state. The Wood River program has been so successful that Blaine County, where the project is located, unanimously passed a resolution in 2014 requesting that the state use non-lethal tools over lethal tools. (10, 11, 12, 13) On the other hand, where killing wolves in response to depredations has been emphasized, depredations have gone up. These results are consistent with the 2014 Wielgus study showing that killing wolves in response to livestock depredations actually causes more depredations (14).

Good-sense economic strategy favors strong ecological protections, and strong protections for wolves. Oregon's natural landscapes are one of its most valuable economic assets. Oregonians receive tremendous economic gains from clean water, livability, outdoor recreation activities, tourism, and other resources associated with our breathtaking natural heritage. Wolves indirectly and directly contribute to these economic gains (15).

The Wolf Plan must prioritize wolf conservation, as promised by ODFW and the commission.

Thank you for considering our comments. Please feel free to contact Paula Hood with any questions or concerns at 510-715-6238 or paula.e.hood@gmail.com.

Sincerely,

Paula Elizabeth Hood

Paula Hood (Co-Director), with extensive contributions from Stephanie Taylor (Volunteer)
League of Wilderness Defenders, Blue Mountains Biodiversity Project

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Crystal L Hutchings

To: ODFW Commission
Subject: RE: EMAILS TO COPY - Defenders of Wildlife's Comments on Staff Summary of Policy Issues

From: Quinn Read [mailto:QREAD@defenders.org]
Sent: Thursday, October 6, 2016 4:15 PM
To: Russ Morgan <russ.l.morgan@state.or.us>; odfw.commission@state.or.us
Cc: Curt Melcher <curt.melcher@state.or.us>; kevin.l.blakely@state.or.us; Shannon Hurn <shannon.m.hurn@state.or.us>; Roblyn Brown <roblyn.brown@state.or.us>; WHITMAN Richard M * GOV <Richard.M.WHITMAN@state.or.us>
Subject: Defenders of Wildlife's Comments on Staff Summary of Policy Issues

Hello Russ,

Thank you for the invitation to participate in the Oregon Wolf Conservation and Management Plan Review Combined Stakeholder Meeting in July. We provided our initial recommendations and concerns at that meeting and we are submitting our final comment letter now in advance of the October 7, 2016 Fish and Wildlife Commission meeting in La Grande. We hope this is helpful, not only to ODFW and the Commission, but also to other stakeholders participating in this and future meetings.

We have updated and reorganized our comments in direct response to the Staff Summary of Policy Issues for the 2016 Oregon Wolf Conservation and Management Plan Review.

Vanessa Lopez will be representing Defenders of Wildlife at tomorrow's meeting. Thanks again for the opportunity to participate and comment.

Best,

Quinn Read

October 7, 2016

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

RE: Five Year Status Review Oregon Wolf Plan

Chair Finley, Commissioners, for the record my name is Nick Cady. I am the legal director for Cascadia Wildlands. I live in Eugene, where our principal office is located.

Cascadia Wildlands has been involved in wolf conservation in Oregon for a good time now, and have specifically been working with the Department on this five year review process. We have been pleased by areas that we have found common ground with the Department, but certain recommendations of the Department are incredibly problematic.

Our primary concern is with the proposed wolf hunting within the Department's recommendations. Regardless of how it is framed, the hunting proposed by the Department will result in annual wolf killing, regular and systematic human-caused mortality of wolves, the very reason this species was wiped from the lower 48, and recovery has stagnated in the southwest. The hunting proposal sets up an incentive system whereby funding for the wolf program will rest upon making chronic depredation determinations and commissioning these hunts. Our organization, based upon lots of experience with state agencies with tight budgets, are very wary that this incentive will lead to continual and regular chronic depredation determinations regardless of the circumstances on the ground.

Our concerns are justified, and shared by the majority of Oregonians. A new poll conducted by Mason Dixon Polling and Research[1] finds the vast majority of Oregon voters (67%) – from both rural and urban areas – oppose using hunting as a management tool for wolves in the state. The poll also revealed that most Oregonians believe that non-lethal methods should be the primary focus in reducing conflicts between wolves and livestock. Oregonians do not believe in the direction this Department is proposing we head in.

When wolves were delisted prior to the initiation of this five year review process, the Department promised there would be no reductions in protections for wolves, because the delisting hinged upon relatively low levels of human-caused wolf mortality now and in the future. Allowing wolf hunting in Oregon paves the way for future conflict.

Thank you for the opportunity to submit this testimony.

Nick Cady, Cascadia Wildlands

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[1] Mason-Dixon Polling & Research conducted the poll of 800 registered Oregon voters on Sept. 20-22.

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www.CascWild.org

Union County Cattlemen
61931 Cottonwood Rd.
La Grande, OR 97850
September 3, 2016i

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

Dear Commissioners:

Union County Cattlemen discussed items that need to be reviewed in the Oregon Wolf Conservation and Management Plan and submit these comments for your consideration during the review period. Since the plan was first written the wolf population has grown and the review can now put ODFW's focus on the management activities that are needed to limit conflicts that lead to predation within the livestock industry.

The livestock industry is on the record supporting a wolf management plan for the gray wolf population that provides the tools and latitude to aggressively mitigate livestock-wolf conflict and fully and fairly compensates (see producer costs in Appendix A) for depredation of livestock

During the current review process we want to encourage ODFW to declare "significant suitable habitat" and identify where such habitat exists. This step may require the plan to identify "no wolf zones" and "highly desirable wolf zones" during the time period beyond Phase III described in the current plan. Wolves need to be managed in way that will be cost effective, provide areas where conflicts between predator and prey can be minimized, and give people effective tools to protect their private property. We suggest the following:

Zone 1. The wolf safe zone. These areas are remote areas where lethal and non lethal methods of wolf control are minimal. Wolves that den or hunt in safe zones can receive the most protection.

Zone 2. Wolf harassment zones. In some areas of the state, many acres of public land exist outside the private land boundaries where wolves can be harassed, chased, trapped, etc. Wolves that den in these areas can be managed to the fullest extent if they become problem wolves.

Zone 3. Private lands, city and towns. No tolerance zone. Wolves can be fully controlled by whatever means necessary to protect property and life.

These zones are necessary due to the cost to livestock producers who are impacted by the wolves living in their area. A breakdown of the costs for the producers is attached as Appendix A.

The basis of the plan identifies management for a minimum number of wolves used to fulfill the requirements to maintain delisting. ODFW should review the current plan and how the wolf population has increased to establish a maximum number beyond which wolves will not be able to grow. This will require a management objective to be established that focuses on the manageable number of wolves ODFW's budget can support as well as sustain a healthy wildlife prey base.

The plan will be implemented only with a dedicated budget and necessary funding to pay for all the provisions of the Conservation Plan and the review process should identify the costs to Oregon and how it is being budgeted within the ODFW agency. The costs to track wolves, collar wolves, and investigate depredation should be detailed and made a part of the plan for future reference. If funding fails, ODFW must lay out a strategy that will be used to continue management.

The plan must provide investigations of depredation by ODFW that includes a third party and decisions that can be appealed. Producers who have a loss of their private property and damage to their small business income should be allowed an opportunity to resolve disputes through due process. The requirement to have to have non-lethal activities in place at the time of a depredation should be dropped since most of the actions have been shown to be of little value in preventing wolf/livestock conflicts.

In Phase II, Phase III and beyond GPS locations need to be provided to show livestock producers where wolves are located or sighted. The current communication process is slow and often ineffective for producers. More than one collar per wolf pack is needed to provide a way to manage the wolf populations and be able to track them when they are near livestock herds. If collars are not continued, the plan needs to describe how ODFW will manage wolves.

We appreciate the opportunity to offer points for the review of the Wolf Conservation and Management Plan. We look forward to seeing the revisions and being able to contribute to a successful management plan for the gray wolf and overall wildlife.

Sincerely,

Union County Cattlemen

Dennis Murchison, Past-President
Jason Beck, Vice President
Pat Larson, Secretary

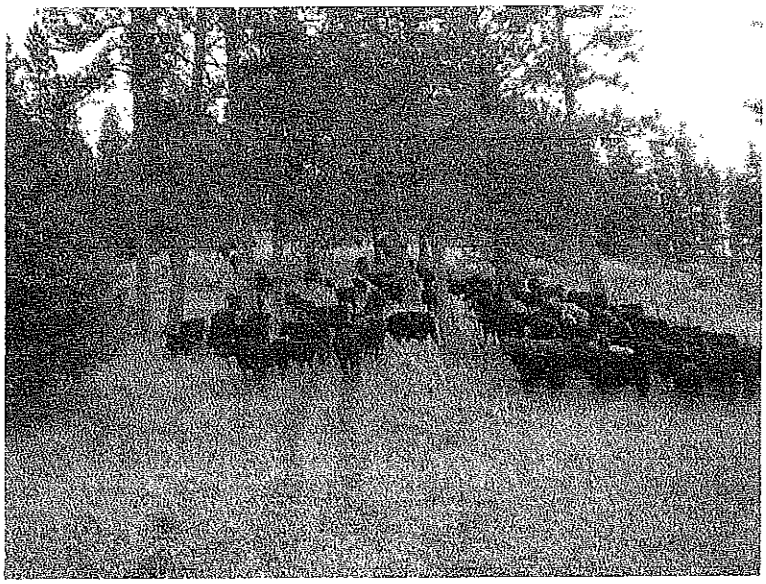
Attachment: Estimates of Economic Losses to Stock Growers due to the Presence of Wolves in North Eastern Oregon by John Williams

Estimates of Economic Losses to Stock Growers due to the Presence of Wolves in North Eastern Oregon

By
John Williams
Associate Professor, OSU Extension Service
Wallowa County, OR
September 2010 (Updated September 2015)

Abstract

While any benefits associated with the introduction of wolves in NE Oregon are primarily nonmarket based, difficult to quantify and widely distributed among possibly millions of people who value wolves, at least some of the costs of introducing wolves in NE Oregon are market based, can be accurately estimated and are focused on the producers and the local economies to which they contribute. North Eastern Oregon includes 5 counties. The livestock producer is on the front line of the wolf/livestock conflict and the losses to the producer both increase the producer's direct costs of doing business and reduces the revenue received in those businesses thereby negatively affecting both sides of their balance sheet. The following economic assessment is based on the assumption that the ranches are in areas where wolves have reached full occupancy and that the cattle are in areas where wolves are present through all seasons of the year.



Estimates of Economic Losses to Stock Growers due to the Presence of Wolves in North Eastern Oregon

Discussions about wolf impacts on livestock producers have focused on the depredation losses and what portion of the actual losses to wolves is found and confirmed. Those confirmed losses generally are reported to be 1 confirmed carcass for every 8 actual losses (Oakleaf, 2003). Even though those numbers are substantial and can cause significant impact to the bottom line of a rancher's business they significantly underestimate all the costs related to wolves, both the probable yet difficult to confirm depredation costs and the increased costs associated with physical stress to the cattle and management costs to the producer. In fact, these unacknowledged direct and indirect costs may be considerably greater than the directly confirmed depredation costs. Reports from ranchers who have dealt with wolves in the years since they were reintroduced in Idaho and Wyoming discuss the non-lethal costs and the increased management costs as much as they do the depredation.

The list of costs include but are not limited to depredation, reduced weight gain for calves, weight loss by cows, conception rate reductions and management costs. The first four are lost income to the producer because of reduced performance or physical loss of the stock (both calves and cows are reported to be lost). The last item, management costs, encompasses a large group of issues that cause increased cost of operation.

Management issues can be broken down into costs of implementing non-lethal activities to attempt to mitigate the impact of the wolf's presence; management costs due to implementation of government regulations and management plans; increased costs of livestock handling, management and range management; increased costs through injury and death of livestock; and the loss of range access because the wolf presence in given places makes it unwise to run livestock in that specific area of range.

Some of these issues are relatively easy to quantify estimates of the loss or expense, others will require much more study and basic data collection before adequate information is available to estimate the magnitude of the loss. Additionally, not all ranchers will experience all of these impacts at the same time.

The reduced performance issues and some of the management costs are estimated below. The cost of loss of rangeland access can be estimated from a previous paper written by Bruce Sorte and John Williams titled "*Potential Wallowa County Economic Impacts of the Reduction or Elimination of Cattle Grazing in the Joseph Creek Rangeland Analysis.*" This paper analyzed the potential loss of grazing permits by 12 permittees due to a lawsuit. The loss was a 1,800 head reduction in carrying capacity on the land and was analyzed as potentially permanent. In that paper it states "the federal land dependent ranches would lose roughly $104,883 in annual gross sales per ranch." While the exact amount would vary by the size of the ranch and the amount of area lost, this estimate provides a useful reference to value grazing land and what happens when it becomes unavailable for whatever reason.

The increased cost due to implementing some non-lethal activities and management costs due to implementation of government regulations and management plans is estimated below.

The most problematic issues, and issues not covered in this analysis are the increased costs of livestock handling, management and range management and the increased costs through injury and death loss of calves being trampled by the cows during wolf attacks. What is reported from ranchers in wolf country (Thomas, 2010) is that cattle become much more nervous and difficult to handle. A new analysis of this is covered in a published paper titled Impact of previous exposure to wolves on temperament and physiological responses of beef cattle following a simulated wolf encounter which looks at the temperament change, blood Cortisol changes and body temperature changes. New techniques are required to make even simple field to field management moves, which is a management practice that ranchers have been increasing to improve the rangeland health. Cattle are reported to be "constantly on the move," refusing to stay where they are placed on the range. Management with cattle dogs becomes much more difficult and often not possible, thus requiring additional cowboys. If dogs are used, the cattle "stay all stirred up and all they do is fight the dogs." Maybe most disturbing and the hardest to quantify is the anxiety that wolves cause among ranchers and their employees forcing 24/7 vigilance that reduces ability to recover and remain productive day after day.

The economic impacts are not all on the producers. There are three types of effects 1) direct effects or sales by ranchers, 2) indirect effects or sales by suppliers, and 3) induced effects or household expenditures of income received while working in the ranching or supplier industries. When the losses to the ranching sector of the economy are as significant as identified below it is necessary to point out that these are only the output or direct effects. If you have $ 231 of decreased revenue per head and the multiplier based on the recent Input/output model as 1.8 for the cattle industry in Wallowa County the total figure of indirect and direct of $415.80 per head just within Wallowa County. That figure would be much larger for NE Oregon.

This economic analysis is based on the following assumptions:

- The ranches are in areas where wolves have reached full occupancy***
- Wolves are present over a significant portion of range and ranching operations in NE Oregon
- An average producer runs 400 mother cows; therefore each cost is spread over all those cattle on a per head basis.
- Expected sale price of $2.40/lb weaned calf*
- Normal or "pre-wolf" sale weight of 560 lbs**

* Based on a review of cattle fax prices and other cattle market information.

** Oregon Agriculture Information Network of OSU/NE Oregon data

***Full occupancy is the condition where wolves' density is such that if young wolves are forced out of the pack they move to outside areas. Wolf competition is significant and there are very few areas that are not considered part of a pack's territory

Decreased Revenues

Reduced conception rate costs

Reduced conception rate by 10% (per Casey Anderson's ****statements)
400 head X 10% = 40 head reduced calves born
560 lbs X $2.40 = $1,344 per head
40 X $1,344 = $53,760.00
$53,760.00/400 head = **$134.40 per head**

Depredation calf kills

15 head lost (Estimate of losses from Wallowa County producers last year)
560 lbs X $2.40 = $1,344 per head
15 head X $1,344/head = $20,160 / 400 head = **$50.40 per head**

Reduced weaning/sale weights

35 lbs estimated loss of weaned calf weight (Research paper quotes 60 lbs, local estimate is more conservative)
560 lbs – 35 lbs = 525 lbs/head weaning weight
525 lbs X $2.45 = $1,286.25 per head (as weight goes down, price per lb goes up)
$1,344.00 -$1,286.25 = $57.75/head @ 80% weaning (down after conception and death loss)
$57.75 X 320 head (80% weaning rate of 400 head) = $18,480.00 / 400 head = **$46.20 per head**

Increased Costs

Cow body condition losses

Loss of one body condition score from 5 to 4 (per Casey Anderson's statements)
Cows should be body condition score 5 at calving to avoid jeopardizing the cows health or life
Cost of feeding a cow adequately to regain the 90 to 95 lbs (1 body condition score) during the winter so she is in condition for calving is **$56.70 per head**
(Cost of grain and increased hay value.)*****

Increased management costs*****

Time spent by manager 1/2 day for 4 months
Assume $5,000 per month $5,000 X .5 = $2,500 per month
$2,500 X 4 months = $10,000
Also
9 months hired help
$150 per day (what paying current range rider to attempt to mitigate wolf loss)
20 days a month

20 X $150 = $3,000 per month
9 months X $3,000 = $27,000

Total labor costs $27,000 + $10,000 = $37,000
$37,000 / 400 head = **$92.50 per head**

Total losses

Depredation calf kills	$50.40 per head
Reduced weaning weights	$46.20 per head
Cow body condition loss	$56.70 per head
Reduced conception rate costs	$134.40 per head
Increased management costs	$92.50 per head

Estimated Cost of wolves to a ranching system
$380.20 per head

Annual Estimated Cost of Wolves to a 400 Cow Operation

Trait	Wolf Effect	No Wolves	Wolves Present	Net Loss (count)	Net Loss ($)
Conception Rate	Decrease from 90% to 80%	360 hd	320 hd	40 hd	$53,760
Weaning Weight	Decrease weight by 35 lbs	560 lbs	525 lbs	35 lbs	$18,480
Death Loss	Increase from 2% to 5.75%	8 hd	23 hd	15 hd	$20,160
Cow Body Condition Score (BCS)	Decrease from 5 to 4	5 BCS	4 BCS	1 BCS	$22,680
Increased Labor Costs	Manager 1/2 for 4 months Hired hand 1 for 9 months	n/a	Manager: $2500/month Hired help: $3000/month		$37,000
				Total Loss	**$152,080**

**** Casey Anderson is a rancher in Idaho that has had significant wolf presence on his ranch, has detailed cow and calf production records, and is a partner in the OSU research titled "Evaluation of Wolf Impacts on Cattle Productivity and Behavior"

Casey wrote: "In the last seven years wolves have become increasingly common, having moved into our area from central Idaho. Over this period we have seen a dramatic increase in livestock losses; confirmed wolf kills, suspected wolf kills and cattle that simply disappear. In 2010 we

have nearly 20 confirmed or probable wolf kills but the full extent of losses will not be known until we gather in the late fall. We expect that when the counting is complete, we will have lost in excess of 60 calves. Wolves are known to take cows and bulls as well as calves. Last year we were short 15 cows and a bull at the end of the grazing season".

*****Body condition scores are numbers used to suggest the relative fatness or body composition of the cow.
SCORE 4 = The cow appears thin, with ribs easily visible and the backbone showing. The spinous processes (along the edge of the loin) are still very sharp and barely visible individually. Muscle tissue is not depleted through the shoulders and hindquarters.
SCORE 5. The cow may be described as moderate to thin. The last two ribs can be seen and little evidence of fat is present in the brisket, over the ribs, or around the tail head. The spinous processes are now smooth and no longer individually identifiable.
To gain 1 lb per day in the winter time, nutrition would have to be increased significantly. Rations were changed from 14 lbs of meadow hay, 5 lbs of Oat hay, 2 lbs of barley and 2 lbs of bluegrass/wheat straw TO; 12 lbs of grass hay ($150/ton), 9 lbs of alfalfa hay ($200/ton) and 4 lbs of Barley ($180/ton). The cost of feed per day rose from $1.53/day to $2.16 per day. OSU Cowculator6 was used to balance the ration.

******Management costs, based on Wallowa County experiences, include

Managers time spent in spring and early summer (.5 person X 4 months) time spent working on putting out rag boxes, fladry use, increased checks during calving, time with ODFW and Wildlife Services on depredation losses, the time in meetings and work sessions related to permits and other programs. Delayed turnout requiring additional feed period close to buildings, use of telemetry to attempt to keep track of livestock when wolves were in close proximity. Disposing of livestock carcasses through county landfill, cleaning up bone piles by burying bone piles or removing to land fill. This time is focused, but not exclusively, during calving and early turn out season. Assume Managers salary and OPE @ $60,000.00 per year.

Employee time is based on the need for additional rider and range work. Assumes April when turn out starts in the county through December when the majority of cattle have been gathered and are returned to headquarters or in the valleys. This employee would be riding in the areas where summer and fall pastures occur, dealing with the nervous cattle, keeping cattle where placed, aiding in cattle moves due to inability to use dogs, increased time fencing, etc.

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Oregon Agricultural Information Network, OSU Extension Service, http://oain.oregonstate.edu

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Oregon
Kate Brown, Governor

Department of Agriculture
635 Capitol St NE
Salem, OR 97301-2532

MEMORANDUM

Date: October 7, 2016

To: Chair Finley and Commission Members
Oregon Fish and Wildlife Commission

From: Lauren Henderson, Assistant Director

Subject: Written ODA comments on updates to Oregon Wolf Plan

Thank you for the opportunity to submit comments and suggestions as the Oregon Department of Fish and Wildlife (ODFW) and the Fish and Wildlife Commission (Commission) progress toward finalizing the state's plan for wolf management over the next 5 years. We appreciate you reaching out to residents and holding your meetings in Northeast Oregon.

As we look back on wolf migration to Oregon from Idaho, primarily we see that the US Fish and Wildlife Service stated many times that no wolves were necessary in Oregon to be considered recovered in the western United States. The natural movement from recovered states guarantees we will continue to have a growing population in Oregon not including the growth within from reproduction.

We know from the experience of neighbor states, that over the next 5 years the wolf population, and conflicts with livestock production will likely continue to grow. We would suggest building a plan that is robust in maintaining minimum populations that will assure no relisting is likely. At the same time, adequate tools should be incorporated to remove problem animals/packs when necessary to stop chronic losses, and build livestock producers' confidence that problem animals will be dealt with.

The plan should continue to address management and conflict resolution strategies. The Oregon Department of Agriculture (ODA) manages the Wolf Compensation Block Grant Program, which encourages preventative strategies in its funding model.

ODA believes that ODFW staff did an excellent job in their summary of the 10 issues where clarity is needed as the state moves into full recovery and phase three in 2017. We appreciate the amount of expense and effort the agency has put into this review. Balancing a viable unlisted wolf population with sustainable livestock production, primarily on private lands, is vital to the success of the plan. We encourage you to continue to engage stakeholders in the process and gather the information needed to make data-driven management decisions.

Again, we thank the Commission and ODFW for traveling to the high wolf exposure area of the state to hear input and create a path forward.

National Headquarters
1130 17th Street, N.W. | Washington, D.C. 20036-4604 | tel 202.682.9400 | fax 202.682.1331
www.defenders.org

October 7, 2016

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

Re: Defenders of Wildlife's Comments on Staff Summary of Policy Issues for the 2016 Oregon Wolf Conservation and Management Plan Review

Dear Russ,

Thank you for the invitation to participate in the Oregon Wolf Conservation and Management Plan (Plan) Review Combined Stakeholder Meeting in July. We provided our initial recommendations and concerns at that meeting and are submitting our final comment letter now in advance of the October 7, 2016 Fish and Wildlife Commission (Commission) meeting in La Grande. We hope this is helpful, not only to the Oregon Department of Fish and Wildlife (ODFW) and the Commission, but also to other stakeholders participating in this and future meetings.

We have updated and reorganized our comments in direct response to the Staff Summary of Policy Issues.

Issue #1: Should the Plan establish population management areas/zones with numerical objectives for Phase 3?

Defenders of Wildlife (Defenders) is opposed to establishing population management objectives or zones in Phase 3. There are currently two wolf management zones in Oregon under the Plan. Some groups have proposed adding new zones to possibly exclude wolves from some areas and increase use of lethal control in others. We support the current two-zone system in Oregon, which maintains reasonable management flexibility in the Eastern Wolf Management Zone while ensuring enhanced and necessary protections in the Western Wolf Management Zone. It is far too early to consider establishing smaller zones, and we strongly oppose the imposition of zones under any circumstances for the purposes of instituting wolf population caps, wolf exclusion zones, or hunts.

If a future Plan revision contemplates the development of zones, we urge caution. The staff summary provided by the agency suggests zoning is contraindicated until there is a minimum population of 250-300 wolves statewide to reduce the probability of conservation failure. The summary also asserts that

based on current growth rates, the population is not expected to reach that level for 3-5 years. We agree that it is premature to impose smaller zones.

Any discussion of zoning should be based on the best available science and reflect the current data and modeling. The Plan should not rely on a static Population Viability Analysis (PVA). We support efforts to use Oregon data to conduct a complete population analysis to model wolf occupancy, habitat and distribution within the state. However, the Plan should make explicit that establishment of smaller zones is not a foregone conclusion. It should also specify that any creation of zones in the future does not imply wolf exclusion zones, population caps or hunts.

Issue #2: Are the special status Game Mammal standards which are currently in the Plan adequate?

A) **Should hunting/trapping be used as a management tool for wolves?**
B) **Are the ungulate and depredation factors which may lead to ODFW management actions in Phase 3 adequate?**

Defenders is opposed to hunting and trapping of wolves in Oregon – including the use of public hunters and trappers to assist with ODFW management response actions. The state wolf population remains extremely low – only 110 wolves in 11 breeding pairs at the end of 2015 – meaning that the species is one of the rarest native species in Oregon today. There is no scientific justification for hunting or trapping wolves in Oregon, especially in lieu of effective nonlethal measures to reduce conflicts with livestock operations.

Oregon has been among the most progressive in wolf conservation and management in the United States. Oregon's leadership in proactive nonlethal alternatives to livestock conflicts with wolves was met with fierce opposition in the early stages, but ODFW's dedication, hard work, and transparency has demonstrated beyond any doubt that wolves and livestock can coexist with minimal losses when these methods and strategies are effectively implemented. Today, fewer wolves and fewer livestock have been lost as a result of depredation conflicts than any other wolf occupied state in the nation. And the Oregon wolf population is growing, resulting in the ongoing expansion of wolf range across Oregon and into northern California.

We understand that population management by hunting or trapping is not recommended during this planning cycle and is dependent upon the complete population analysis as described in Issue #1. However, we are concerned that this will create an expectation by some stakeholders that hunting and trapping will necessarily follow completion of the analysis. ODFW should work to manage these expectations.

We also understand that ODFW considers hunting and trapping a possible solution to address limited agency capacity for wolf management. We are sensitive to the expenditure of human and financial resources required to maintain the wolf program. However, we do not believe the solution is hunting and trapping – which reduces social tolerance for wolves and creates a financial incentive for the agency to move more quickly to lethal action. Recent social research indicates that hunting of wolves may actually decrease public tolerance toward the species, especially among anti-wolf residents. (Treves et al 2013, Chapron and Treves 2016).

The loss of adult wolves that defend their pack's territory from other packs may influence entire packs and survival of pups. Furthermore, larger packs are better able to defend territory and are more successful in hunting larger prey (Barber-Meyer et al 2016). Beyond this, wolves play an important ecological role in ecosystem function and should be allowed to flourish where habitat allows. Therefore, we are opposed, even under the terms proposed in the staff summary, to creation of a special permit to hunt wolves as a management tool – even with assurances that any hunt would be carried out under the supervision of a guide.

ODFW has been involved in an extensive process through the HB 2402 task force to explore alternative sources of funding for agency operations. The agency should be focused on finding new resources for the conservation work supported by the majority of Oregonians. The agency should not resort – now, or in future Plan revisions – to a model that depends on hunting license/permit sales to sustain wolf program work. This model has been proven unsustainable in Oregon and across the nation and is contrary to the stated goals of the Plan.

Further, current poaching law, is insufficient to safeguard wolves. ORS 496.705, dealing with damage suits for unlawful killing of wildlife and amended by HB 4046, contains a significant loophole for "unintentional" take, thereby excusing any individual who takes a wolf but can claim mistaken identity. The problems created by this loophole are compounded by the shortage of resources to support enforcement activities.

Issue #3: Should the Department modify its current reliance on radio/GPS telemetry to monitor the wolf population and provide information to livestock producers?

The Oregon wolf population is growing but still numbers well under 200 wolves statewide. Any wildlife population occurring at such low levels merits regular and reliable monitoring to detect any negative trends caused by poaching, disease, or other mortality. There are greater options for monitoring wolves today than when the Plan was adopted in 2005. These include field camera trap surveys, DNA sampling, and recorded howling analysis (Stansbury et al 2016). ODFW may consider updating its methods for monitoring wolves based on reliability and staff time associated with these new techniques.

In regard to providing information to livestock producers, the current Plan contains two phrases related to this issue:

Page 43: Provide wolf-monitoring information to landowners, livestock producers and the public as needed to keep them informed of wolf activities and movements.
Page 53: Provide landowners and local livestock producers the most current information on areas where wolves are known to be active (e.g. from radio telemetry.)

While it is important to convey significant movements of packs (e.g. new denning sites, changes in range, major dispersals or new packs in areas where older packs once held, etc.), it is not an effective use of resources to convey all movements of individual wolves on a frequent basis. Wolves are highly mobile and by the time that a report reaches the ODFW office, the wolf may be miles from that location by the end of the day. Wolves are present throughout the range and the Wolf Notification

System (WNS), though once useful in establishing an understanding of that range, is no longer an effective tool in Phase 2 and 3. Many wolves are uncollared and more will be in the future. Reliance on the WNS can create a false sense of security, which may backfire if ranchers don't take adequate protection of livestock because of irrelevant information.

In addition to the above Chapter 2 and 3 comments, we also encourage ODFW and the State of Oregon to:

- Maintain important state requirements for nonlethal depredation prevention and conflict management regardless of the phases of the Plan. These include adequate removal of attractants (e.g. dead livestock piles and/or diseased, injured, or newborn livestock without adequate protection from predation) and adequate and suitable proactive methods to discourage wolves from seeking out and killing livestock;
- Continue to design, investigate and field test new nonlethal methods to avoid livestock losses to wolves and increase sharing this information through publication of data in cooperation with state university wildlife and social conflict researchers. ODFW's experience and knowledge gained through pioneering many nonlethal methods and strategies would be valuable to other states and countries where these conflicts are still ongoing;
- Continue collaring wolves only when needed to track and monitor packs and individuals as they disperse into western Oregon and reestablish in new parts of their historic range. Wolves should not be collared unless there is overriding need to secure their protection or monitor dispersal. Nonlethal measures have been proven effective without the use of collars, and
- Identify and proactively build specific recommendations for nonlethal strategies in likely conflict areas to avoid depredations and encourage wolf dispersal and new pack territory.

Issue #4: Are the population objective numbers for Phase 2 and Phase 3 adequate?

The Oregon Wolf Conservation and Management Plan's 3-phased population approach was established to commit measurable objectives for tracking progress toward conservation, reproduction and delisting goals. We agree that 7 breeding pairs in Phase 3 is not a defensible population threshold, target or cap. The initial thresholds for each phase represent a compromise based on what was achievable in the political and social climate of the time and before wolves were recovered in other western states. If reassessing population levels, now or in the future, necessitates the addition of new phases, we advocate strongly for a best available science standard to be applied to those thresholds. If the agency is planning a complete population analysis as discussed in Issue #1, reassessment of population objective numbers for Phases 2 and 3 should be deferred until that analysis is complete.

Given the Commission's decision to delist in November 2015, we encourage ODFW to explicitly establish its criteria for relisting. General confusion arose around the phrase "may consider" with respect to delisting. Some stakeholders interpreted this as a requirement that the Commission would automatically delist at the specified threshold. Others, including Defenders, interpreted this as a statement that the Commission would simply consider the matter without an assumed outcome. The agency should clarify if and when it means "may" or "shall" in establishing a process for relisting.

The current Plan contains vague criteria for relisting. In the event of a population decline by illegal poaching or lethal control, the Plan states relisting may not be necessary. Instead, the Plan points to reductions in lethal control or actions to halt illegal poaching, but provides little specificity or

direction. We encourage the agency to consider language that outlines steps to be taken, including a temporary moratorium on lethal action, emergency funding to boost enforcement of Oregon's poaching laws and/or translocation of wolves within the state if warranted.

In the event of a population decline caused by habitat conditions, low prey or disease, the Plan states relisting may be warranted. Again, the provisions here are unnecessarily vague. If there is a rapid population decline, ODFW may request a status review by the Commission. As above, the agency should specific whether it means "may" or "shall." We encourage the agency to adopt mandatory language along with interim measures to ensure survival of the species. Likewise, it should provide some direction as to what constitutes a rapid population decline.

If the population decline is not rapid, but dips below the conservation population objective at which delisting occurred, the Plan states that ODFW will increase monitoring efforts. At the end of that year, if the population continued to decline, a status review would be initiated. Defenders believes a population drop below the conservation population objective of 4 breeding pairs is an inappropriately low threshold. We encourage the agency to reconsider the triggers at which either a status review or increased monitoring would occur. Specifically, the Plan should clarify that relisting may be appropriate to address any population decline.

Issue #5: Should the Department redefine chronic depredation as related to lethal control in Phases 2 and 3?

The 2010 Plan defines "chronic depredation" as "Chronic livestock depredation: situation where two livestock depredations have been confirmed by ODFW or Wildlife Services, or one depredation followed by up to three attempted depredations (testing or stalking). To date, lethal control of wolves in Oregon has not been initiated with fewer than 3 depredations (Keating 2009, Imnaha 2010, and Imnaha 2016). Though in nearly all repeated depredation events, ODFW was asked to conduct lethal control upon the second depredation, regardless of the circumstances (e.g. wolves left area, nonlethal measures increased, carcass pits cleaned up, livestock removed, etc.). **The current Phase 2 definition of chronic depredation "2 depredations or 1 depredation with 3 attempted depredations," is unjustifiably low and would put packs at risk that are rarely involved in livestock depredations.**

Killing packs or disrupting packs by killing key individual wolves risks opening that pack's territory to new wolves that may prey more on livestock. Packs that rarely prey on livestock should be valued and protected as they typically defend their pack range from other wolves. Stable packs allow wolf managers and livestock operators to adopt and implement more effective nonlethal strategies based on denning behavior, pack range, prey selection, and risk aversion related to best practices of nonlethal deterrents adaptively applied when and where needed. Removing or disrupting packs that infrequently prey on livestock is in no one's best interest.

Defenders recommends that ODFW adopt a more reasonable definition of "chronic depredation" based on the experience gained from working with packs in eastern Oregon. We suggest that at minimum "chronic depredation" under Phase 2 and 3 should only apply to packs with **four or more confirmed depredation events involving two or more livestock killed in a twelve month period and only after adequate nonlethal deterrents have been appropriately implemented.**

Issue #6: Should the Plan carry forward the Phase 1 non-lethal requisites for lethal control of depredating wolves into Phases 2 and 3?

Defenders of Wildlife strongly supports the Phase 1 non-lethal requisites in the current Oregon Plan and encourages their continuation. Specifically, the 2010 Plan states:

> "**Generally, non-lethal techniques should be the first choice when wolf-livestock conflicts are reported, regardless of the wolf population status.** When wolf numbers are low, more emphasis is placed on wolf control techniques that do not involve lethal removal of wolves. Wolf managers and livestock producers are not required to exhaust all non-lethal techniques, but instead, a good faith effort to achieve a non-lethal solution is expected. In order to use the widest array of management tools available in any given management phase, livestock producers will be encouraged to employ management techniques to discourage wolf depredation, and agencies will advise and assist in implementing such techniques. Wolf managers working with livestock producers are encouraged to employ management techniques that have the highest likelihood of success to resolving the conflicts and that are reasonable for the individual situation. This includes the identification of unreasonable circumstances that may attract wolf-livestock conflict…"

It further states:

> "**When Phase III is reached, non-lethal techniques will remain the first choice of managers in dealing with conflicts.** However, more emphasis may be put on lethal control to ensure protection of livestock if it can be demonstrated that non-lethal methods are likely to put livestock at **substantial risk**. In areas where chronic wolf problems are occurring, wolf managers may seek assistance from private citizens through special permits for controlled take to resolve conflict. In addition, liberalized options for lethal control by livestock producers will be considered in consultation with wolf managers in circumstances where such activities can enhance the probability of relief for the livestock producer." (Oregon Wolf Conservation and Management Plan /Chapter III – Wolf-Livestock/Domestic Animal Conflicts Page 44 -45.)

While we support the overall principle of the preceding section, we believe that some language should be clarified. It would be helpful to define what it means to put "livestock at substantial risk" in this context. Likewise, we request some clarification of "chronic wolf problems" that may give rise to wolf managers seeking assistance from private citizens through special permits for controlled take to resolve conflict. Additional guidance from ODFW about these terms would be very useful in the next version of the Plan.

ODFW has provided an excellent online resource in nonlethal measures to minimize wolf-livestock conflict information that is available to the public at http://www.dfw.state.or.us/Wolves/non-lethal_methods.asp. We strongly support the staff suggestion that the agency add language to clarify continued prioritization of non-lethal conflict avoidance measures.

Issue #7: In the federally delisted portion of Oregon, should the Department conduct all depredation investigations when in Phase 3?

Related issue: Reducing wolf-related workload for Department field personnel

Some livestock producers have frequently complained that ODFW takes too long to investigate, confirm and/or implement lethal control of wolves. Conducting reliable and meticulous investigations can take time to complete. Compared to many other states, ODFW has an established record of prompt response to serious wolf-livestock depredation events. ODFW does not have the staff, nor should they expend their resources, on investigating every possible suspected livestock death attributable to wolves. One of the region's top wolf-livestock depredation investigators in the northern Rockies reported that 9 out of 10 reported possible wolf depredations were actually livestock mortalities caused by disease, birthing complications, dehydration, and other factors. It is in everyone's best interest if ODFW field investigation teams and resources are reserved for likely wolf depredations and not unrelated mortalities, and a certain amount of flexibility in prioritizing their response based on the merits of the report should be allowed.

In the first years of wolf recovery in Oregon, Wildlife Services investigators were often at odds with ODFW's investigation standards and determinations. In recent years, that conflict appears to be greatly reduced. We appreciate, for example, Wildlife Services' recent hosting of a nonlethal training workshop in Pendleton that assisted wolf managers and some livestock owners to learn more about these important techniques. However, while experts in lethal control of predators, Wildlife Services agents still need more experience in analyzing and implementing nonlethal strategies to minimize livestock losses using nonlethal deterrents and livestock husbandry techniques. This experience is a paramount resource during wolf-livestock depredation investigations as this is the best opportunity to evaluate the situation first-hand and recommend actions to prevent or significantly reduce conflicts.

The potential for Wildlife Services to expand their contributions to local communities experiencing wolf and livestock conflicts and become the lead in nonlethal conflict management is significant. ODFW has established extensive experience in nonlethal conflict management and a constructive partnership between the agencies would be a win-win for wolves and livestock. However, until Wildlife Services' field investigators gain expertise in evaluating, recommending, and helping to implement nonlethal wolf depredation deterrent measures (including the equipment and protocols necessary for implementation), it would be in the Oregon public's best interest to maintain ODFW as the lead wolf- livestock conflict investigation agency. This will help ensure that appropriate nonlethal measures are identified and implemented and that lethal control of wolves remains a last resort option in managing conflicts.

Issue #8: Should the Department initiate a facilitated advisory group process to aid wolf management in Oregon?

Defenders strongly supports the staff proposal to implement a wolf advisory group in Oregon to improve respectful and productive dialog between wolf stakeholder groups and ODFW. It is unfortunate that distrust between and among some stakeholders and ODFW has deepened in recent years. It is ironic that at the same time the on-the-ground situation for livestock and wolves in Oregon

is on a positive trajectory -- wolf population numbers are up, depredations on livestock are down -- the human dynamic seems to be heading in the wrong direction. If we are ever going to get beyond this polarization, we need to fundamentally change the dynamic of how we deal with the issues and how we relate to one another.

To that end, Defenders requests that ODFW include development of a stakeholder Oregon wolf advisory group to address and work together to resolve the long term conflicts concerning the conservation and management of wolves in Oregon. We must acknowledge that tensions among stakeholders, ODFW, and elected officials are only growing. This conflict is not a simple dispute about wolves. If it were, an agency-driven settlement process or simple commission rule-making could likely address it. But after years of unresolved, underlying conflicts between the interested parties, we now have a deep-rooted, identity-based conflict. The good news is that there are other approaches. These are not necessarily quick, nor are they easy, but they can lead to more lasting solutions. By recognizing the nature of the conflict we are grappling with, we have an opportunity to transform it.

There is no one-size-fits-all model, but we strongly believe that Oregon would benefit from creation of a neutral forum to conduct respectful and ongoing conversations about wolf conservation and management. A stakeholder advisory group would not be a decision making body, but could be equipped to collaborate on issues beyond the scope of the current Plan review. The group could consider and make recommendations on funding for the agency and the implementation of the Plan. The group could also consider issues related to compensation, baiting, killing competitions and trapping reform. Most importantly, the group could meet regularly with a third party neutral facilitator to discuss models for coexistence – and assistance for livestock producers– that support ongoing wolf conservation.

We request that ODFW include provisions in the Plan to re-establish and maintain a statewide wolf advisory stakeholder committee to facilitate information sharing, deliberation of conflict avoidance strategies, and increase communication and understanding among stakeholders. This is likely the most important action that the State of Oregon can take to help reduce conflict-driven division and empower those who are willing to work for coexistence.

Issue #9: Should the Plan allow for increased flexibility and expediency around the issue of lethal take in response to wolf/livestock conflicts?

> **Related Issues: Counting "probable" determinations toward lethal control, local investigations and decisions, and improving expediency.**

We do not support the use of "probable" determinations to be included in consideration of lethal control. We support a focus on "confirmed" depredations – as determined by evidence-based investigations – before lethal action is considered. The definition of "chronic depredation" should be clarified accordingly. Our position on chronic depredation is addressed in detail in Issue #5 above. We support the proposal that probable determinations be used solely to assess the severity of a wolf depredation situation and possible solutions.

Issue #10: Should the Plan create a third-party review process in situations of disputed depredation investigations?

While the Oregon Cattlemen's Association and Oregon Farm Bureau have requested third party review of ODFW's investigation review process, we believe that an additional "independent review" is unnecessary and would not be an appropriate use of limited state resources. Any stakeholder can initiate their own review of ODFW's depredation investigations, but ODFW is eminently qualified to make the determinations. Defenders has overseen compensation reimbursement for livestock depredations valued at more than one million USD. These depredation claims for reimbursement came with supporting information including wolf depredation investigation reports from Idaho, Montana, Wyoming, Utah, Washington and Oregon. ODFW consistently provided the most reliable depredation investigations and supporting evidence of any of these states.

That is very important for two reasons: 1) Oregon wolf depredation compensation is largely paid for by Oregon taxpayers who deserve a reliable and transparent system for expending their funds and 2) the ODFW investigation reports are among the most thorough and transparent of any state in the country. It is therefore possible for any third party to review the depredation investigations at any time and evaluate the evidence (e.g. descriptions, photos, supplemental GIS data, etc.) on which the Department's decision was based. Lastly, ODFW's training in depredation forensic investigations is second to none. There are no known local veterinarians, for example, that have equal or greater experience to ODFW in this field of expertise.

It is important that there be timely communication between ODFW and stakeholders to address concerns before concerns may spiral out of control. It was noted during the June 21 meeting, that ODFW is considering eliminating the Wolf Deterrence Plan reporting system that is currently in use. Defenders strongly encourages ODFW to maintain these reports as they help reduce confusion and speculation over depredation conflicts and they provide an excellent means for providing timely information to livestock producers and local residents and landowners, and provide the only means the public has to help evaluate and recommend enhancements to the Deterrence Plans. Public interest in wolves continues to grow nationwide (George et al 2016). This feedback is valuable to the Department and we will encourage more nonlethal specialists to review these reports and contribute more information when appropriate. Further, the Deterrence Plans provide the best record of communication concerning depredation events and should be maintained for that significant value alone. The reports help residents better understand the role of the Department and the measures available for protecting livestock and minimizing conflicts with wolves.

<u>Additional issues not addressed in the 2010 Plan:</u>

Public lands versus private lands grazing

We urge the Department to work with the USDA Forest Service and Bureau of Land Management and stakeholders to constructively address chronic (both current and potential) conflict areas to determine viable solutions when possible. These should include identifying alternative grazing for livestock operators when suitable alternatives are available. Any grazing allotment that is chronically indefensible from native predator depredations using nonlethal measures should be considered a high priority for reassignment to more suitable grazing locations. While these situations are rare, the long-

term solution is obvious. Native wildlife should take precedent over nonnative species in remote, wilderness type public land settings where livestock cannot be protected using reasonable nonlethal deterrents. Applied appropriately, nonlethal deterrents are effective in minimizing losses of livestock to native predators in most grazing areas. With good planning and collaboration, there is room for both wildlife and livestock in the West. We pledge to work with ODFW, the USDA Forest Service, the Bureau of Land Management, Tribal governments, livestock companies, and conservation organizations to evaluate, recommend, and secure suitable alternatives.

Compensation

While this falls outside the parameter of ODFW's management responsibilities, we want to also express our concern that if compensation for livestock losses to wolves is to continue beyond Phase 1, 2 and/or 3, it should continue to be offered to reimburse livestock owners who are responsibly working to minimize losses to wolves by reducing attractants including livestock carcass pits and implementing reasonable and proactive nonlethal methods to deter wolves from preying on livestock.

We appreciate the opportunity to submit our comments and look forward to working with ODFW and the State of Oregon to support the successful restoration and conservation of wolves.

Respectfully yours,

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Defenders of Wildlife and Our Long Term Role in Oregon Wolf Recovery

Defenders of Wildlife (Defenders) is a national non-profit membership organization dedicated to the protection of all native animals and plants in their natural communities. We have approximately 1.2 million members and supporters nationwide and more than 17,000 members and supporters in Oregon today. Founded in 1947, Defenders of Wildlife is one of the country's leaders in science-based, results-oriented wildlife conservation. We stand out in our commitment to saving imperiled wildlife and championing the Endangered Species Act, the landmark law that protects them. We work to protect and restore America's native wildlife, safeguard habitat, resolve conflicts, work across international borders and educate and mobilize the public.

Defenders has played an active role in the reintroduction of wolves to the Northern Rockies and to the Mexican wolf recovery area in the Southwestern USA. We have also been highly active in Oregon wolf restoration including sponsoring the first Oregon wolf management planning workshop in 1999; serving as a member of the initial state wolf management plan committee in 2005; privately funding compensation to livestock operators for livestock losses due to wolves until 2011; and helping Oregon establish its own statewide compensation and coexistence program. We have assisted the Oregon Department of Fish and Wildlife (Department) with nonlethal training workshops, provided livestock depredation deterrent funding and equipment, and together cosponsored the first wolf coexistence range rider project in the state. During summer 2015, we worked with the Department to help reduce sheep and wolf conflicts and provided the Department with Foxlights, a new deterrent that we brought to the region from Australia wildlife and livestock managers. These Foxlights are being credited with successfully minimized losses of sheep to wolves in the conflict area this grazing season.

Citations:

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Cc: Oregon Fish and Wildlife Commission
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Shannon Hurn
Roblyn Brown
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10/7/16 Testimony from Mary Grace Brogdon of Springfield, Oregon on the Wolf Conservation Plan to the Dept. of Fish and Wildlife

The commission and the Oregon Department of Fish and Wildlife must keep their promise that the plan will prioritize the conservation of wolves, not their eradication. The parts of the plan that have proven to work well for all parties must be retained. The Department of Fish and Wildlife and livestock owners must exhaust all feasible nonlethal measures to prevent conflict before resorting to killing wolves because killing wolves - at a rate less than that which would lead to genocide - is not an effective way of decreasing predation. A Washington State University study showed that killing wolves actually increased depredation on livestock when done at rates less than 25%, the replacement rate for the species. When alfa pack members are killed, it frees up the rest of the pack to breed and then become stuck in one place to rear pups. As that place was likely near the site of the predation, researchers theorize the uptick in livestock loss is the result of parents trying to feed their young to survive. (Please avail yourselves to the cited study: Effects of Wolf Mortality on Livestock Depredations Robert B. Wielgus, Kaylie A. Peebles Published: December 3, 2014http://dx.doi.org/10.1371/journal.pone.0113505)

The State holds wolves as a public trust for all of us and should not be killing our wolves on public lands to benefit a private, for-profit industry. If, as ranchers would have you believe, this is a matter of public safety, please consider that no humans have died in the lower 48 states from wolf attacks in the last 50 years where as, according to the CDC's database from 2001-2013 cows caused an average of 20 human deaths annually. CDC report notes, "large livestock are powerful, quick, protective of their territory and offspring, and especially unpredictable during breeding and birthing periods." Furthermore, the assertion that wolves pose a serious threat to livestock is not bourn out by the statistics. Based on a 2011 report from the National Agricultural Statistics Service, coyotes and dogs were responsible for more that half of the predation on cattle while wolves were not a statistically significant contributor. [National Agricultural Statistics Service (NASS) Report, Agricultural Statistics Board, United States Department ofAgriculture (USDA).Cattle and Calf Death Losses, Released May 12, 2011] Similarly, Montana agricultural statistics show that from 2004-2014, sheep were most threatened by coyotes, followed by weather. Wolf deaths came in at a measly 1% or less depending on the year while weather accounted for 12 to 27% of sheep deaths over the same period (See attached table.).These shepherds could make better use of their time combating climate change.

We must ensure that there is no public hunting or trapping of wolves, of any kind, in Oregon. Ever. The murder of these thinking, feeling, loving, wise, brave communal animals is inexcusable. Having spent some time with captive wolves, I can tell you they are people, not like us, but more honest and direct than your average human. As the story telling species on this planet, we sometimes get the story wrong like when we told ourselves we were separate, better, or more entitled than the other animals with whom we share the earth. As the story tellers, we have the great responsibility of owning our mistakes and doing better in the future. I charge you as the department of fish and wildlife to write your plan for these wild wolves in such a way that ensures their innate rights to live, be well, and have a home range, rather than a plan that favors a single industry built on the exploitation of domesticated livestock.

Sheep and Lambs Death Loss by Cause and Value of Loss

Cause of Loss	SHEEP LOSS				LAMB LOSS				TOTAL LOSS			
	Number of Head		Value in Dollars (000) 1/		Number of Head		Value in Dollars (000) 2/		Number of Head		Value in Dollars (000)	
	2013	2014	2013	2014	2013	2014	2013	2014	2013	2014	2013	2014
Predators												
Bear	300	200	54.0	41.5	500	100	87.5	17.9	800	300	141.5	59.4
Bobcat	--	--	--	--	100	100	17.5	17.9	100	100	17.5	17.9
Coyote	2,200	2,500	396.0	518.8	10,600	10,700	1,855.0	1,915.3	12,800	13,200	2,251.0	2,434.1
Dog	100	100	18.0	20.8	200	200	35.0	35.8	300	300	53.0	56.6
Eagle	100	--	18.0	--	600	700	105.0	125.3	700	700	123.0	125.3
Fox	--	--	--	--	600	300	105.0	53.7	600	300	105.0	53.7
Mountain Lion	100	200	18.0	41.5	100	100	17.5	17.9	200	300	35.5	59.4
Wolf	--	--	--	--	--	200	--	35.8	--	200	--	35.8
Other Animals	--	--	--	--	100	400	17.5	71.6	100	400	17.5	71.6
Unknown Predators	100	--	18.0	--	500	600	87.5	107.4	600	600	105.5	107.4
Total Predators	**2,900**	**3,000**	**522.0**	**622.5**	**13,300**	**13,400**	**2,327.5**	**2,398.6**	**16,200**	**16,400**	**2,849.5**	**3,021.1**
Non-Predators												
Total Diseases	1,400	1,100	252.0	228.3	3,500	2,100	612.5	375.9	4,900	3,200	864.5	604.2
Lambing Complications	800	800	144.0	166.0	3,600	2,800	630.0	501.2	4,400	3,600	774.0	667.2
Old Age	2,900	2,600	522.0	539.5	--	--	--	--	2,900	2,600	522.0	539.5
On Back	300	400	54.0	83.0	--	--	--	--	300	400	54.0	83.0
Poison	300	200	54.0	41.5	300	200	52.5	35.8	600	400	106.5	77.3
Theft	100	1,900	18.0	394.3	200	1,400	35.0	250.6	300	3,300	53.0	644.9
Weather Conditions	500	700	90.0	145.3	5,600	5,600	980.0	1,002.4	6,100	6,300	1,070.0	1,147.7
Other	600	100	108.0	20.8	900	300	157.5	53.7	1,500	400	265.5	74.5
Total Non-Predators	**6,900**	**7,800**	**1,242.0**	**1,618.5**	**14,100**	**12,400**	**2,467.5**	**2,219.6**	**21,000**	**20,200**	**3,709.5**	**3,838.1**
Unknown Causes	**900**	**1,200**	**162.0**	**249.0**	**1,600**	**1,200**	**280.0**	**214.8**	**2,500**	**2,400**	**442.0**	**463.8**
Total Loss	**10,700**	**12,000**	**1,926.0**	**2,490.0**	**29,000**	**27,000**	**5,075.0**	**4,833.0**	**39,700**	**39,000**	**7,001.0**	**7,323.0**

1/ Using average reported value for Ewes 1+. 2/ Lamb values equal to market year average price received for lambs multiplied by an average weight of 60 pounds per lamb.
-- Denotes less than 100 head.

Sheep and Lambs Percent of Loss by Cause

Cause of Loss	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014
Predators											
Bear	2	1	1	1	2	1	2	2	2	2	1
Bobcat	--	--	--	--	--	--	--	--	--	--	--
Coyote	21	19	20	23	20	26	25	20	32	32	34
Dog	2	1	1	2	1	1	2	1	2	1	1
Eagle	2	2	2	2	2	1	2	2	1	2	2
Fox	2	2	1	2	3	2	3	2	1	2	1
Mountain Lion	1	--	1	1	1	1	1	1	2	1	1
Wolf	1	1	1	1	1	1	1	--	1	--	1
Other Animals	--	--	--	--	--	--	--	--	--	--	1
Unknown Predators	1	1	1	2	1	1	1	1	1	1	2
Total Predators 1/	**31**	**27**	**28**	**34**	**30**	**34**	**36**	**28**	**43**	**41**	**42**
Non-Predators											
Digestive	7	2/	2/	2/	2/	1	2/	2/	2/	2/	2
Internal Parasites	2/	2/	2/	2/	2/	1	2/	2/	2/	2/	1
Respiratory	10	2/	2/	2/	2/	4	2/	2/	2/	2/	4
Metabolic	2	2/	2/	2/	2/	1	2/	2/	2/	2/	--
Other Diseases	3	2/	2/	2/	2/	3	2/	2/	2/	2/	1
Total Diseases	**22**	**17**	**13**	**16**	**11**	**10**	**10**	**11**	**10**	**12**	**8**
Lambing Complications	11	13	13	13	11	8	11	9	14	11	9
Old Age	8	7	6	6	7	5	6	4	6	7	7
On Back	1	2	1	1	1	1	1	1	--	1	1
Poison	2	3	3	2	2	1	1	1	2	2	1
Theft	--	1	1	1	1	--	1	1	--	1	8
Weather Conditions	12	15	18	14	23	24	18	27	13	15	16
Other	3	5	3	2	3	2	3	4	3	4	1
Total Non-Predators 1/	**59**	**62**	**58**	**55**	**58**	**50**	**51**	**59**	**49**	**53**	**52**
Unknown Causes	**10**	**11**	**14**	**11**	**11**	**16**	**12**	**13**	**8**	**6**	**6**
Total Loss 1/	**100**	**100**	**100**	**100**	**100**	**100**	**100**	**100**	**100**	**100**	**100**

1/ Totals may not add due to rounding. 2/ Not available. -- Denotes less than 1 percent.

10-7-16

Good morning/afternoon Chair Finley and members of the Commission:

My name is Cheryl Martin. I am a rancher in Baker and Union Counties and I am the District Vice President for District 2 of the Oregon Cattlemen's Association. That district includes Wallowa, Baker and Union Counties.

When I was asked to present testimony today for the review of the Wolf Conservation and Management Plan, I thought about the words that would be used and the stories and experiences told. Our stories, experiences and perceptions have changed since the origination of the wolf plan in 2005 and since the update in 2010. We in Eastern Oregon and we in the livestock industry now know the realities of coexisting with wolves. We know the heart-wrenching, fatiguing fact that or animals are not always safe and run the continual risks of trauma and torment by a lone wolf or by a pack. We understand now the economic impact, whether it be the blatant confirmed depredation or the more subtle losses that manifest themselves in reduced weight gains of calves, loss of weight in our cows, cows coming in open or without a calf by their side, significant changed behavior and definite increased management costs. These are the tough real words and stories.

But, as I contemplated this testimony, I began to realize it also can be stories and experiences about celebrations and successes. The celebrations and successes are the result of hour and hours of hard work and collaboration of multiple stakeholders which includes ranchers, agency people and special interest groups. The hours put forth paved the way for a thoughtful, successful plan. This, the Wolf Conservation and Management Plan. And to many, that is where the celebration occurs. It is for the 110+ wolves thriving in the state, the increase of 36 % over the previous year. The expansion of the wolves' territory in Oregon, the decrease in depredation levels in spite of the increase in wolf numbers, the compensation in 10 counties, the increased research in wolf studies. These are all indications that the wolf plan is a cause for celebration. BUT I can say unequivocally that these successes are due in a large part, avery large part because the ranchers have worked tirelessly with Oregon Department of Wildlife to make the wolf plan viable. The nonlethal methods used, the cooperation, the increased knowledge of the wolf, the willingness to be patient, law abiding citizens and to follow the plan as we said we would.

Therefore, because of the strong commitment, we as livestock producers and Oregon Cattlemen's Association remain steadfast in recommending the following proposed changes:
We believe because we, the ranchers, are the entities that live with the physical, emotional and economic repercussions of the wolf, that any changes or adaptations to the plan will suit the needs of the livestock producers. We believe ODFW should have the resources required to respond swiftly, fairly and consistently to chronic interactions between wolves, humans, and livestock. It is crucial that determinations are made quickly and honestly. We feel it is imperative to increase funding and personnel for more collaring. And then, make sure The GPS information is made accessible to producers that will or may be impacted. We believe two probables should equate to one confirmed. We all know that LOCAL, SIMPLIFIED management is the most effective management. We believe the plan should allow for a third party appeal process. We strongly believe there should be no onerous burden for land owners in Phases 2 and 3. Wolves should be managed in a cost effective way in areas with minimal impact to livestock and human conflict.

I thank you for the opportunity to offer testimony today and as we celebrate the successes of the wolf plan we realize the areas where there is a need for growth and change in this review. As the wolf population continues to increase the interactions with humans, livestock and wildlife will also increase. Oregon Cattlemen's Association is committed to working with ODFW and other stakeholders to insure that those interactions are detrimental to our ranching culture and industry, while still allowing the old plan to be a success.

Thank you.

To: Oregon Department of Fish and Wildlife Commissioners
From: Suzanne Fouty, Baker City, OR
Date: October 7, 2016

RE: Proposed changes to the Oregon Wolf Conservation and Management Plan Review

My name is Suzanne Fouty and I live in Baker City, OR. I am addressing four items.

Item #2. I am opposed to hunting/trapping of wolves. Trapping is not animal specific and as such would not be able to effectively address problem wolves. The same applies for public hunting. Concerns about chronic depredation and wild ungulate numbers need to be addressed case-specifically and only after livestock management, habitat loss and poaching have been addressed. As for the elk-feeding stations, I believe that this issue needs to be examined separately and options explored given its complexity.

Item #5: I support keeping the Phase 1 definition of chronic depredation. Information to date indicates it is working. Increasing the time frame makes it too difficult to separate out cause and effect and responsible animal and thus decreases the effectiveness of lethal control.

Item #6: I support bringing Phase 1 non-lethal requirements forward into Phase 2 and 3. They are good husbandry. I also propose an additional requirement. If a depredation occurs on public land, prior to counting the depredation against a wolf, it should first be determined if the livestock in question was in the appropriate pasture and whether it was still permitted to be on public lands. If in the wrong pasture or should have been already off public lands as stated in their permit, then the depredation would not count against the wolf as it pertains to taking lethal actions.

Item #9: I do not support "probable" determinations given its ambiguity especially when they occur on public lands. The risks that livestock face on public lands are high and it is not uncommon for livestock to in areas not permitted or on after their off dates. This makes them difficult to manage and places an undue burden on ODFW staff and wolves for what is a permitte's responsibility.

Hello – my name is Danae Yurgel, and I live in La Grande. First, I would like to thank Mr. Russ Morgan for his years of dedicated service to this issue. Northeast Oregon has been my home since 1975, and I'm proud to say I graduated from Eastern Oregon University. I have worn many different hats in this community over the years, but today I am speaking as an orchardist, caretaking Avella Orchard here in La Grande.

As an orchardist, I am always worrying … about the weather, about hail damage, about early or late freezes, but mostly about water … especially groundwater. We know that our groundwater here in this valley is dependent on the hills surrounding us having intact soils, and intact soils require intact forests, and intact forests require an intact wildlife web, which includes a healthy population of wolves. Scientific studies have established that wolves benefit the health of the landscape, particularly riparian areas. Since I am concerned about water, something we all share, I am requesting that wolves have **increased protection** under the Wolf Plan. especially here in northeast Oregon.

This is a Dr. Ward's Golden Russet apple, one of the many unique trees in our orchard grafted years ago by Mr. Ryan and Dr. Ward from local homestead trees. These trees are part of our local heritage. When children visit the orchard, climb the trees, taste these unique apples they are connecting to a living history, a living legacy. Wildlife is also part of the living history of this area, the living legacy for these children, and that includes wolves. We have the highest population numbers wolves, and it is from here that wolves are spreading to other areas of Oregon. Wolves here are an integral part of these children's heritage, but not just for children in Union County, not just in Oregon, but all of this country. For these children, and their children's children, I am asking that wolves have **increased protection** under the Wolf Plan, especially here in the delisted area.

Specifically today I am requesting that the Phase 1 agreements worked out for assessing levels of depredation, investigating depradation, and requirements for non-lethal prevention are carried into Phase 2. I also request that ungulate population levels are completely dropped from consideration in lethal take, and that trapping is specifically barred.

Thank you.

10-7-16

UNION COUNTY
BOARD OF COMMISSIONERS

Steve McClure Commissioner
Mark D. Davidson, Commissioner
Jack Howard, Commissioner

1106 K Avenue La Grande, OR 97850 PHONE (541)963-1001 FAX (541)963-1079 TTY 1-800-735-2900

October 7, 2016

Oregon Fish & Wildlife Commission

Dear Commission Members:

The reintroduction of wolves on the landscape of Northeastern Oregon has had a serious detrimental effect on our rural residents and one of our primary industries in particular, livestock production. This is well documented in John Williams' white paper, "Estimates of Economic Losses to Stock Growers due to the Presence of Wolves in Northeastern Oregon."

Wallowa County's Natural Resource Advisory Committee and the Union County Cattlemen's Association have studied the issues at length. Both have submitted comprehensive and thoughtful input during this review process which I wholeheartedly endorse. I would like to highlight a few points I think are important:

- Confirmation of Depredation; the use of a third party to establish wolf involvement in a depredation would be beneficial to all parties involved.
- Lethal Take; two probable events should count as one confirmed and one confirmed should require a lethal take determination.
- Appeals of Decisions; create an independent board of local officials to hear and rule on appeals of decisions by ODFW staff.
- Tracking Collars; to effectively manage and administer the Wolf Plan, all known packs must have multiple members collared. The communication between the Department and Producers must be improved so livestock can be protected.
- Management Areas; population targets for unique zones should be established based on the habitat attributes of the area and maintained by controlled hunts if necessary.

Thank you for holding this hearing today in La Grande. We appreciate the Commission's willingness to meet in the regions affected by their decision-making.

Sincerely,

Mark D. Davidson
Commissioner

10/7/16

Chair Finley, Commissioners, Director Melcher, thank you for the opportunity to testify.

I am Wally Sykes, a resident of Joseph for 21 years and a founder of Northeast Oregon Ecosystems.

I support the positions set forth in today's testimony by Oregon Wild, the Center for Biological Diversity, the Endangered Species Coalition and Cascadia Wildlands together with detailed comments submitted in writing by myself and these organizations.

I want to emphasize the revulsion I and the majority of Oregonians have for sport or commercial hunting and trapping of wolves. I believe Oregonians, who consistently support wolves by a two-thirds majority, would be outraged by any decision to allow sport hunting of wolves, and incensed by allowing them to be commercially trapped, itself an activity so brutal and cruel as to be outlawed in most civilized countries and in our neighboring states both north and south. A poll released today showed 73.8% of rural Oregonians oppose trophy hunting of wolves, a greater percentage than for the state as a whole, in which 72.4% oppose hunting.

The Wolf Plan Review should reinforce and extend into Phases II and III its focus on transparency, clarity, and enforceable standards that reduced conflict in Phase I and made killing wolves a last resort. Reliance on nonlethal means to reduce livestock conflict should be encouraged as an evolving and vital part of livestock management to curtail the killing of our wildlife to benefit a special interest, especially on public land.

Wolves should not be killed to protect ungulate populations, nor should any predator, until degraded habitat, disease, climate variations, hunting, and especially poaching can be clearly eliminated as primary causes. Predators should not be scapegoats, and should not be killed at the behest of the fewer than ten percent of Oregonians who are hunters.

Thank you for holding these considerations and those in written comment in mind during the Wolf Plan Review.

Forest Web
of Cottage Grove

PO Box 853 Cottage Grove, Oregon 97424
Email: forestweb.cg@gmail.com Website: forestweb-cg.org

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

Re: Wolf Conservation & Management Plan

October 7, 2016

One of the many issues Forest Web of Cottage Grove advocates for is wolf recovery. Our chief concern, that I wish to address today, is that a statewide population of approximately 110 wolves does not constitute a viable gene pool to assure long term species sustainability in Oregon. A healthy population must be sufficiently large to prevent genetic problems caused by inbreeding. The population must also be great enough, and distributed across a large enough area, so that catastrophic events such as disease or severe weather will not likely eliminate the entire population. Given that Oregon's forests cover more than 30 million acres, of which approximately 60% is federally owned, a population of 1200 wolves is ecologically sustainable.

I am also a small timber-lot owner, and I have lost animals to coyote and cougar. It is regrettable, but those of us who have the privilege to live in rural Oregon also need to shoulder the responsibility of living so closely with Nature. Unlike our wild neighbors, humans are more adaptable and can change how we manage our lands to better safeguard our livestock.

The science supports the return of the wolf. Apex predators play a vital role in the health and biodiversity of an ecosystem. Peer reviewed studies have proven this fact through monitoring the reintroduction of wolves into places such as Yellowstone.

The biggest threat to the recovery of wolves in the United States is man. With their delisting, wolves are at even greater risk to human predation. The numbers from other states reflect this danger, for example, under Idaho's management, from April 2011 to April 2012; wolf mortality was over 48% of the state's wolf population, including 372 wolves killed by hunting and trapping. Though wolves have returned to Oregon, the population is still at risk and under no circumstance should hunting and trapping be a part of ODFW's new management plan.

The role of a keystone species is vital to the maintenance of a healthy ecosystem and when the apex predator is removed it creates a serious imbalance. Wolves have only established a fragile foothold in Oregon, and we need to develop a land ethic that allows them to thrive throughout the state instead of demanding their destruction. We need to see past fear and prejudice and utilize proven solutions that will allow humans and wolves to coexist.

Cristina Hubbard, Project Director
Forest Web of Cottage Grove

October 6, 2015

Dear Commissioner Finley and other commissioners,

I know you represent *all* Oregonians and I thank you for giving proper weight to my testimony, as well as to others. Two years ago, I moved to Eugene after seven years in the upper Klamath Basin where I worked with children of ranching families. I have lived in eastern Washington and the Cascade mountains. For twelve years, I lived in cougar and bear territory, even while raising small children. I have also lived in big cities. Consequently, I have a solid grasp of both urban and rural views of apex predators and of human efforts to raise and hunt animals for food.

It is natural for wolves to consider livestock food and it is natural for ranchers to protect livestock. I believe wolves need protection as well. To sustain a wolf population and to address ranching concerns, a clearly defined plan in terms of causation for removal must be established. This would give agency staff a strong methodology to address reports of depredations, lessening litigation and conflict from all factions. There are those who will not accept the killing of wolves no matter what circumstances. However, some rural citizens want protection from what they perceive as an unnecessary threat to their way of life. *Both* views need to be considered and the best way is to reduce losses of livestock and reduce the killing of wolves. For those efforts to work, criteria needs to be stated in clear and enforceable language.

In order to address these polarized views, it is essential that the plan clearly states:

1) the specific number of *proven* depredations;
2) the manner in which the area is defined;
3) an absolute time frame;
4) the need for prior use of *sufficient, documented* nonlethal deterrents in the defined area.

For those who value wildlife, as I expect each of you do, removal of wolves should not be based on ambiguous regulations that will inevitably lead to contention. I am hopeful that you will establish a plan with detailed, transparent language and methodology reflecting the views of all Oregon citizens, both urban and rural. Thank you for your time and consideration.

Sincerely,

Alison (Ali) Litts
1543 Grove St.
Eugene, Oregon 97404