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WITNESS REGISTRATION

Oregon Fish and Wildlife Commission

October 10, 2014, Jackson Co. Fairgrounds, Mace Center, 1 Peninger Rd, Central Point, Oregon

EXHIBIT D

PUBLIC HEARING ON: EXHIBIT D: 2014 Oregon Wolf Management Report

She has to leave for a flight.

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PUBLIC HEARING ON: EXHIBIT D: 2014 Oregon Wolf Management Report

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Exhibit D - Wolf Plan
Oct 10, 2014

Dalton Strauss
Public Testimony

The reintroduction of wolves into Oregon is impacting our livestock industry and our rural communities. Oregon Farm Bureau has been engaged in this issue for over a decade and had a representative on the Wolf Management and Conservation Plan's advisory committee.

Since the development of the plan, the landscape of wolves in Oregon has dramatically changed. We currently have thriving populations, and we know their impacts. That is why Oregon Farm Bureau is requesting the Commission open up the Wolf Plan for a full review. The plan directs a review every five years. We do not believe the previous review consisting of interviews of stakeholders was sufficient.

Farm Bureau requests an advisory committee of stakeholders based off the original advisory committee be established to conduct a full review of the plan.

Also if eastern Oregon wolf populations remain stable, we urge the commission to start delisting efforts in 2015. This would meet the guidelines in the Wolf Plan and agency rules. A delisting would provide the livestock industry and rural communities additional tools for living with Oregon's growing wolf population.

Thank you.



OREGON

BOW HUNTERS, INC.



October 10, 2014



Subject: Wolf Plan Review and Delisting



To: Fish and Wildlife Commission



From: Oregon Bow Hunters *OBH*



Thank you for the opportunity to comment on the matters of reviewing and updating the Oregon Wolf Conservation and Management Plan (Plan), and the potential for delisting of wolves under the current Plan.



Oregon Bow Hunters (OBH) has not established an official position statement regarding the presence of wolves in Oregon. However, OBH is very concerned about excessive predation on game animals by the large predators, especially since predation by cougars and bears is a major factor in keeping game populations seriously depressed in many parts of Oregon.



Many hunters believe there is something primeval and positive about having wolves and the other large predators on the Oregon landscape so long as an appropriate balance is maintained between human interests, game populations and predator populations. Because game populations are already under severe stress due to increased and only minimally controlled populations of the other apex predators, it is crucial that wolf populations and distribution be managed based on appropriate scientific considerations, not emotion!



Assuming that at least four (4) breeding pairs of wolves successfully reproduce in 2014 as expected, OBH supports the ODFW staff's proposal to address delisting of wolves before initiating a formal review and update of the Plan. Doing so would make the most productive use of ODFW's staff resources by avoiding duplicative work on plan review activities that could change if the plan review proceeds ahead of the delisting consideration.



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Exhibit D - Wolf Management Report



CENTER for BIOLOGICAL DIVERSITY

Because life is good.

October 10, 2014

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

Chair Levy and Commissioners,

On behalf of our 17,211 members and supporters in Oregon, the Center for Biological Diversity submits the following comments regarding wolf management in Oregon, namely:

- The request made by representatives of the Oregon Cattlemen's Association for specific point location data from radio-collared wolves.
- In 2015, the State will undertake a 5-year review of the Oregon Wolf Conservation and Management Plan.
- In 2015, the State may embark on a status review and process to consider whether to delist wolves under state law, depending upon successful breeding pair numbers at the end of 2014.

Each of these actions has significant ramifications for the recovery and conservation of wolves in Oregon.

Request by the Oregon Cattlemen's Association for Point Location Data from GPS - Collared Wolves Should be Denied Due to High Risk to an Endangered Species and Improper Use of Wildlife Radio-Collar Data.

In a September 5th meeting with Commissioners in northeast Oregon, Oregon Cattlemen's Association representatives requested the department significantly expand the level of detail and frequency of information it provides to livestock producers regarding specific locations of collared wolves. We would be hard-pressed to think of a more inherently-risky action in the recovery and conservation of an endangered species than providing to livestock producers --- or any member of the public -- real-time, point location information for that species.

This is not just a threatened and endangered species issue -- the Oregon Department of Fish and Wildlife is legally required to protect wildlife. If the commission directs the department to provide such sensitive information regarding an endangered species, it opens the door to

demands for similar information for any other species the department has radio-collared for research and management purposes.

The department has been providing wolf location information to livestock producers since 2009. Initially, livestock operators could come to the department's office to view maps prepared of wolf pack territories. Subsequently, the department developed specialized software which automatically provides daily texts or emails directly to producers who have livestock within polygons of wolf territory derived from radio-collar information. The department sent out more than 83,000 text and email messages last year.

Providing wolf location information to livestock producers even at this level is fraught with risk, highly questionable and not mandated by the Oregon Wolf Conservation and Management Plan ("Plan"). The Plan provides that livestock producers will be provided wolf monitoring information "as needed" to help prevent conflicts. (Plan at 43.) If the goal of providing information is to prevent depredations and to help people learn how to live with wolves, the optimal approach is to simply advise the producer that there is a new pack in their area.

Does providing sensitive location information about an endangered species help people learn how to live with them? There is no evidence that it does. In fact, over time, livestock producers have simply become dissatisfied with the current information delivery system because it does not meet their expectations. And it shouldn't, because -- as the Oregon Chapter of the Wildlife Society described in its September 30th letter to the commission -- radio collar data is collected for wildlife professionals to increase their knowledge or ability to manage wildlife species; raw data collected by the collars then needs to be analyzed, by wildlife professionals, to interpret the results. The designed purpose of telemetry collars is to assist wildlife managers in conservation, not for use by one special interest group to protect their economic interests. If protecting economic interests of special interest groups is a road the State wants to go down, it should expect an influx of requests -- and be prepared to honor those requests --- for point location data for collared wolves from tour guides, professional photographers and the like. In fact the Plan itself does not limit information recipients to landowners or livestock producers but also lists "the public." (Plan at 43.) That being the case, if specific location data is given to producers, then a request for wolf location information from members of the public who would like to help act as human presence to deter conflicts should equally qualify for receipt of the information.

There are additional conservation, safety and policy reasons not to provide specific location information about wolves:

- **Loss of Control over Wolf Safety** – individuals armed with specific wolf location data can kill wolves; the State will no longer be in control of who may or may not kill a wolf.
- **Sets Precedent for Other Species** – providing detailed location information sets a bad precedent for other species. If a hunter wants location information on collared bighorn rams, on what basis could the department deny this request? It also creates consistency problems for threatened and endangered species generally.
- **Leaks** - once the information goes out, it can easily reach others who were not the designated recipient.

- **Increased Likelihood of Wolves getting Harassed** – knowing specifically where a wolf is or recently was allows for wolves to be harassed even when they are not near livestock nor involved in any conflicts.
- **Increased Likelihood of Wolves to Move off of Kill-sites of Natural Prey** – harassment of wolves feeding on or near kills they have made of deer or elk disrupts their feeding, could result in their having to kill another deer or elk and lead to more conflicts.
- **Increased Likelihood of Human Presence and Harassment near Den sites and Rendezvous Sites** – specific location information will easily lead recipients to determine where den sites and rendezvous sites are, based on the frequency and time of year of the location information. This could create stress for packs and affect pup survivorship.
- **More Risk to Wolves and Expense to the Department from Increased Collaring Efforts** – collaring wolves involves substantial risk to the animal; the stress of capture and collaring can lead to capture myopathy, resulting in death. The more intense demand there is on the department to provide detailed location information will result in the department having to always re-collar wolves whose collar batteries are about to fail and to more and more animals being collared. This places many more animals at risk and more animals at repeated risk of harm or death in the capture/collar process. The department reported at the October 9, 2014 Commission workshop that the cost of radio-collaring a wolf via helicopter capture is \$6,000. This is not an expense the department can withstand if radio-collaring demands increase.
- **Significant Increase in Agency Workload** - Currently, the department spends approximately 95% of its time on issues related to wolf-livestock conflict and investigation of potential depredations reports, despite the very low incidence of actual wolf-caused depredations. Rather than significantly increasing the agency's workload in this arena, livestock operators should simply be implementing conflict deterrence measures after being informed there are wolves in their area. This would allow the department to focus its time and resources on the many other promises made in the Plan, such as outreach and education, and research.
- **Liability to the Department** – if the department provides point information and a wolf is killed as a result, the prospects for liability and likelihood of litigation are significant.

In response to the Oregon Cattlemen's Association's request for point location data from radio-collared wolves, the commission has received letters and/or comments opposing this request from the Oregon Chapter of the Wildlife Society, as well as from the Center for Biological Diversity, Oregon Wild, Northeast Oregon Ecosystems, Predator Defense, Cascadia Wildlands, Klamath Siskiyou Wildlands Center, and, we understand, from one or more Tribes. The department's responsibility to wolves, and to all of Oregon's citizens, is to conserve and protect this endangered species. Releasing highly sensitive location information is in direct contradiction with that mandate.

2015 Review of the Oregon Wolf Conservation and Management Plan is a Review, not an Overhaul of the Plan.

The Plan, adopted in 2005, is reviewed every five years. Its most recent review was in 2010, but additional changes were made in 2013, pursuant to a litigation settlement agreement. The 2013

revisions have had only a year of implementation, but appear to be achieving their intended result. In instances where lethal control of wolves for wolf-livestock conflicts is considered, there is transparency and accountability by the agency. Before lethal control can be considered, nonlethal measures to deter conflict must have been in place, and a standard now exists for what constitutes chronic depredation.

The five-year reviews were not intended by the stakeholders who developed the Plan to become a Plan overhaul. The plan was developed over a three-year process with substantial public input. The Plan is working, the newest revisions are working, and we urge the commission to continue to allow the new revisions ample time to play out on the ground, and to reject any proposals to significantly change how Oregon is managing wolves.

Potential Initiation of Status Review in 2015 Must Not Have a Pre-Determined Outcome.

The Plan contains a phased management approach, and indicates that Phase I objectives will have been reached when there exist four successful breeding pairs for three consecutive years. At this point, per the Plan, the State will embark on a status review to consider whether to delist wolves from Oregon's Endangered Species Act. The department has indicated that by the end of 2014, the Phase I objectives may have been met.

Reaching those objectives is merely a benchmark for consideration of delisting, through a full, public status review process, and the outcome is not pre-determined. We urge the department and the commission, in its public statements about a potential status review, to be very clear that public input is a required and necessary component of the status review, and that the public's input on whether delisting is appropriate must be considered in any final decision.

Process for 2015 Plan Review and Potential Status Review.

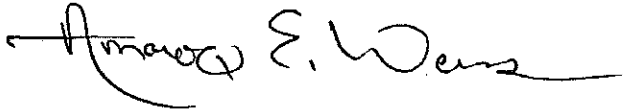
If Phase I objectives are met, the department has indicated that 2015 may see both processes take place – a five-year Plan review and a status review for consideration of delisting – and has recommended that, if so, the status review occur first. This would result, however, in an inability to evaluate one of the five delisting criteria that must be met in any delisting decision, *i.e.*, whether adequate regulatory mechanisms exist to protect the species and its habitat. It is the Plan and its associated rules that provide the regulatory mechanisms for conservation and management of wolves throughout the entire state (and federal regulations in that part of Oregon where wolves are still federally listed; however there is a pending federal proposal to remove those protections in Oregon and elsewhere) For this reason, we recommend a process in the reverse order of that suggested by the department.

Conclusion

Oregon's wolf population stands at only 64 wolves, as of the end of 2013, and it is only in the last four months that the first breeding pair west of the Cascades has been confirmed. It is a population that is still in the early stages of recovery, and the department's mandate is to protect and conserve all the state's wildlife, but especially its threatened and endangered species. There is no rational basis for providing sensitive location data regarding an endangered species and many reasons that counsel against doing so. Similarly, steps to review the Plan and to potentially

embark on a status review require a precautionary approach -- to ensure that wolves will continue to remain on the Oregon landscape, expand their range into former habitat and be established as a self-sustaining population for generations to come. Thank you for this opportunity to provide comments.

Sincerely,

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

Amaroq Weiss

West Coast Wolf Organizer

Center for Biological Diversity

Oct 10, 2014 - Exhibit D. Wolf Mgmt. Report

Thank you Chair Levy and Commissioners for the opportunity to speak today.

I am Wally Sykes from Joseph, Oregon, in Wallowa County. I'm a member of the Wallowa County Wolf Compensation Committee, a co-founder of Northeast Oregon Ecosystems and a member of the Pacific Wolf Coalition.

I fully support the comments submitted to this Commission and the positions expressed today relevant to the wolf status and Wolf Plan reviews by Oregon Wild, the Center for Biological Diversity and other members of the Pacific Wolf Coalition.

However I would also like to point out that I have been involved with wolf issues since the day wolves first appeared in Wallowa County and am well informed about the emotions, facts and politics which swirl around this iconic keystone species.

This is why I am particularly concerned by the effort of certain members of the Oregon livestock community to turn the clock back to the days of yore when wolves and other predators were simply killed for the inconvenience they caused to some livestock producers. I am afraid that if these particular livestock interests have their way the progress that has been made in our state towards scientific, rational, ethical and environmentally conscious wolf management will be discarded and forgotten, and our nascent wolf population will become a token, never to attain the level necessary for healthy biological diversity and species survival.

Oregon residents have spoken again and again in polls and comments in support of healthy wolf populations and their wishes should be paramount in the minds of those tasked with their management. As it stands now, over 90% of the ODFW wolf budget and 100% of the state compensation funds and wolf compensation tax credits directly benefit the livestock producers, all at taxpayer expense. Revisions to the Wolf Plan should be considered an opportunity to increase public outreach and education about wolves, encourage and expand the use of nonlethal wolf/livestock deterrents and range management techniques, and shield our small wolf population from possible decimation at the behest of elements of the livestock industry and others who would like wolves reduced to a marginal presence in our state. The spirit, transparency and accomplishments of the 2013 Settlement should be maintained.

In reviewing the Wolf Plan and in planning the fate of our wolves, we should be cognizant of the social dynamics of wolf packs, considerate of the fact that much of the wolf/livestock conflict occurs on public land, and aware of the ecological benefits wolves bring to those areas they inhabit, not least of which is their ability to limit elk populations on privately owned summer ranges where large elk herds are now being culled, at the ranchers' request, through special hunts. Here is an opportunity to let wolves do their job to the advantage of the livestock producer.

It is worth mentioning that although wolves are intermixed among tens of thousands of cows and sheep (There are more than 35,000 cows in Wallowa County), they are involved in few livestock conflicts. Considering that sheep and cattle are, to the wolf mind, "slow meat," their forbearance is exemplary.

Lastly, I would add that were the ODFW to approve the livestock industry's request for detailed wolf locations, it could then be considered complicit, however unintentionally, in the not unlikely event that wolves would be illegally harassed and killed.

I urge the Commission to deny the request by the Oregon Cattlemen's Association for specific location

data for wolves, or for any species.

Thank you.

Exhibit D - Wolf Management
Plan - Public
Testimony

Oregon Department of Fish and Wildlife Commission
4034 Fairview Industrial Drive SE
Salem, OR 97302
odfw.commission@state.or.us

Testimony re: Wolf Issues

October 10, 2014

Dear Chair Levy and Commission Members,

My name is Jordan Beckett, and I am representing both Cascadia Wildlands and Klamath-Siskiyou Wildland Center today. Combined, these conservation organizations represent 10,000 residents in Oregon. Gray wolf recovery in Oregon is a primary conservation goal for both organizations.

Two major deadlines are approaching in Oregon concerning wolf management. In October of 2015, the Department will be required to undergo a five-year status review of Oregon's Wolf Conservation and Management Plan. Additionally, 2014 could mark the third consecutive year of four breeding pairs in Eastern Oregon, a milestone that would allow the Department to consider a state Endangered Species Act delisting process.

Cascadia Wildlands and Klamath-Siskiyou Wildlands Center urge the Department and the Commission to forgo any listing status process until after the five-year status review is concluded. Regardless of listing status, management of wolves will automatically move into Phase II in Eastern Oregon if the Department confirms four breeding pairs this winter. Oregon only has a single pair of wolves in the western portion of the state, and continued responsible management of wolves in the eastern third of Oregon will largely determine whether wolves continue migrating west. The Department should concentrate its limited resources on fine-tuning the wolf management regime under Phase II, as opposed to engaging in a time and resource-consuming delisting process.

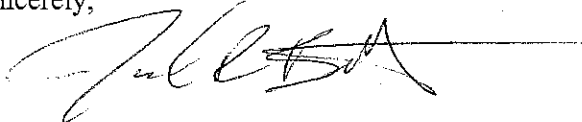
Our organizations see the five-year review as an opportunity to fine tune any gray areas in the Plan and are strongly opposed to any efforts to gut any of its substantive provisions. Moreover, we encourage the Commission to adhere to the bipartisan commitments that have been made in the initial development of the Plan, the 2010 review and the landmark gray wolf settlement in 2013. Since the settlement agreement and promulgation of new rules governing lethal control of wolves, wolves populations have increased but depredation levels have remained consistently low and well within the amounts allocated for compensation. The implementation of non-lethal preventative measures has increased and is working to actively prevent wolf-livestock conflict before it begins. Because of the settlement, wolf management is now more transparent and stakeholders now know what must be done in order for lethal control to be considered. Our organizations would like to thank the Department and the Commission for its hard work and faithful execution of Oregon's plan.

Finally, the Commission is considering today a request from the Oregon Cattlemen's Association for real-time location data on wolves. Our organizations vehemently oppose the distribution of this information. Producers already receive information concerning approximate wolf locations, and providing real-time GPS data would require an overhaul of this already effective system and further burden limited staff capacity. Further, real-time data puts wolves at risk of poaching. Fortunately, poaching incidents have been relatively limited in Oregon, but the widespread dissemination of this information could be exploited by those hoping to undermine wolf recovery in Oregon. Exact endangered species locations are not disclosed by federal wildlife agencies for this reason.

Gray wolf recovery is of significant importance to many Oregonians. Cascadia Wildlands and Klamath Siskiyou Wildlands Center urges the Commission to continue the successful wolf conservation and management regime that it currently being faithfully executed by the Department. We remain cautiously optimistic that, through careful and thoughtful state and federal oversight, gray wolves will continue to migrate west to re-occupy suitable habitat and continue on their path to their historic recovery.

Thank you for your consideration, and please contact us if we can provide any further information on the issues raised above.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jordan Beckett', with a horizontal line extending to the right.

Jordan Beckett

On behalf of:

Nick Cady, Legal Director
Cascadia Wildlands
PO Box 10455
Eugene, Oregon 97440
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Exhibit D - Public Testimony

Blue Mountains Biodiversity Project

October 10th, 2014

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

RE: Blue Mountains Biodiversity Project's testimony regarding wolf management review at October 10th, 2014 ODFW hearing

My name is Paula Hood, and I am Co-Director of Blue Mountains Biodiversity Project.

Our mission is to protect and restore the natural ecosystems of the Blue Mountains and Eastern Oregon Cascades. We work on four national forests, and we have been active in Eastern Oregon for 22 years. Our work includes extensive monitoring of public lands projects and we have field-checked many thousands of acres of national forests with the help of hundreds of volunteers. Wolves are an integral part of ecosystem health in these areas, and we are very supportive of their full recovery so that they can once again fulfill their ecological roles and have sustainable populations.

While we do not agree with some aspects of the Wolf Conservation and Management Plan- such as the lethal take of wolves, especially on public land- we recognize that the current Plan reflects good-faith efforts and compromises from all participants. And that the Plan strives to preserve both our state's wildlife and its ways of life, and reflects a spirit of respect and cooperation. We urge you not to weaken existing protections or the conservation-based emphasis of the current management plan as this would jeopardize the delicate and mutually negotiated balance that was struck through hard work and compromise.

We would also like to point out that under Oregon's current management Plan, wolf numbers are up while depredations remain extremely low. (1, 2)

The Wolf Conservation and Management Plan is clear- more than four breeding pairs of wolves will trigger **a status review** of the population. It does not trigger automatic delisting. The Plan states that: "Once the conservation population objective is achieved, the process to **consider** delisting will be initiated." "The law requires the Commission to base any delisting decision on scientific criteria related to the species' biological status in Oregon and to use documented and verifiable scientific information." There are at least 20 such statements and detailed explanations throughout the Plan that make it clear that delisting is *not* automatically triggered when four breeding pairs are present.

We are concerned that in light of ongoing threats from parvovirus (3), poaching, and other sources of mortality, Oregon's small wolf population continues to be in jeopardy of extinction. 64 wolves is a very small number for any recovering population- and it is especially small for wolves given their pack structure and breeding dynamics. Wolves are still too limited in numbers and in distribution for sustained populations or ecological recovery to occur.

We are very concerned that if protections for wolves are decreased through upcoming decisions regarding wolf management in 2015, then programs and regulations will not be adequate to protect our still recovering wolf population. In addition, we second Oregon Wild's written testimony that a plan review should take place either concurrently with or before a status review, since consideration of the regulations is required to inform the status review.

The public favors wolf recovery. The public wants wolves and supports strong legal protections on endangered species, including wolves. 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.

Wolf recovery and protection does not mean that ranchers will be solely shouldering financial burdens incurred from living with wolves- USFWS announced last month that it will distribute \$900,000 in grants and compensation for non-lethal controls and depredations in western and Midwestern states. Eastern Oregon counties received over \$150,000 dollars through Oregon Department of Agriculture in non-lethal and compensation funds. (7, 8)

Non-lethal works! Non-lethal techniques for preventing wolf predation on livestock can be very effective and include strobe lights, fladry, electric fencing, guard dogs, range riders, and other methods.

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 seven 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 last month requesting that the state use non-lethal tools over lethal tools. (9, 10, 11, 12)

In areas where lethal take has been emphasized in Idaho, depredations have gone *up* while wolf populations have gone down- to the tune of \$400,000 projected for 2014. (12, 2) Washington State recently killed an alpha female wolf by mistake. (14) Oregon can do better- we can make smart and logical choices that emphasize non-lethal techniques with better results.

Lethal control also 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. (14)

Wolves fill vital roles in ecosystems. Examples include releasing prey populations from coyote pressure which in turn sustains healthier populations of certain bird species. Also, wolves can prevent damage from ungulates to streams and riparian habitats, 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. (15)

In relation to the issue of sharing more specific data collected from wolf collars: we second the testimony submitted by Oregon Wild and by the Oregon Chapter of the Wildlife Society and share the concerns that were raised in their testimonies, including the potential for the inappropriate and possibly harmful use of collaring data.

Finally, I would like to end my testimony with a quote from the book *Sand County Almanac* by Aldo Leopold: "In those days we had never heard of passing up a chance to kill a wolf. In a second we were pumping lead into the pack, but with more excitement than accuracy: how to aim a steep downhill shot is always confusing. When our rifles were empty, the old wolf was down, and a pup was dragging a leg into impassable slide-rocks.

We reached the old wolf in time to watch a fierce green fire dying in her eyes. I realized then, and have known ever since, that there was something new to me in those eyes – something known only to her

and to the mountain. I was young then, and full of trigger-itch; I thought that because fewer wolves meant more deer, that no wolves would mean hunters' paradise. But after seeing the green fire die, I sensed that neither the wolf nor the mountain agreed with such a view."

Thank you for considering my testimony.

Sincerely,



Paula Hood
Co-Director, Blue Mountains Biodiversity Project

Footnotes/references:

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**OREGON
WILD**

Formerly Oregon Natural Resources Council (ONRC)

www.oregonwild.org

September 18, 2014

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

Chair Levy & Commissioners,

Oregon Wild represents over 10,000 members and supporters across the state who support our mission to protect and restore Oregon's wildlands, wildlife, and waters as an enduring legacy for future generations.

We write today to strongly caution the agency against releasing specific wolf collar location data to the public as requested by Todd Nash, Rod Childers, and other representatives of the Oregon Cattlemen's Association.

Earlier this year, we expressed concern over general location data being shared and going viral in communities hostile to wolf recovery. While we support efforts to reduce and prevent conflict, the current program already seems to have exceeded its utility and is more often used to criticize the agency and locate wolves than prevent conflict as it was intended.

Sharing timely specific location data is far more problematic. Wolves continue to be at the center of a campaign of purposeful misinformation and fear. Poaching of wolves and other wildlife continue to occur in Oregon. Social media, truck bumpers, and coffeeshop chatter in some communities is rife with talk of the poachers code to "shoot, shovel, and shut up".

In addition to obvious and immediate concerns about those who mean harm to wolves, we are also concerned about precedent and Pandora's Box this could open.

Well-intentioned and malicious actors alike will seek location information for wolves and other wildlife. Can hunters request information about collared animals? Can environmental activists request information to volunteer to reduce depredations, prevent poaching, and safeguard wildlife? Photographers? Students? Reporters? Tourism outfits?

Collars are a useful, but controversial, tool for wildlife managers and researchers. If location data for a sensitive endangered species is given to special interests hostile to their recovery, collaring of all wildlife will go undergo greater public, legal, and legislative scrutiny. Organizations who are supportive or agnostic on collaring may be spurred to actively oppose collaring through legal and legislative means.

Given the controversy, dubious benefit, and abuse of the current system, we urge the Commission not to consider expanding the program by releasing specific or timely wolf collar location data to the public.

Sincerely,

Steve Pedery
Conservation Director
Oregon Wild

Cc: Director Roy Elicker, Governor John Kitzhaber, Wolf Coordinator Russ Morgan

Portland
5825 N. Greeley Ave.
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Eugene
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Bend, Oregon 97701
tel: 541.382.2616

Exhibit D - Public Testimony

10 October, 2014

ODFW Commission meeting October 10, 2014

RE: Public Testimony, **OREGON WOLF CONSERVATION AND MANAGEMENT PLAN**



Chair Levy, Members of the Commission, Director *Melcher*, FOR THE RECORD; my name is Rich Thompson; I serve as a Director of TRADITIONAL ARCHERS OF OREGON (TAO).

On behalf of TAO, I wish to communicate our position regarding **Oregon's Wolf Conservation and Management Plan**:

While Traditional Archers of Oregon (TAO) has no formal position on wolves repopulating Oregon, we willingly accept their presence on the landscape and the possibility they might add to the overall experience they bring to archery hunting.

Like so many other sports groups in Oregon, TAO members have put boots on the ground and provided "sweat equity" to enhance ODFW wildlife areas and the big game animals that rely on them for survival.

TAO members have said YES to monetary donations so we might partner with Oregon sports groups to:

- Protect big game resources through **The Wildlife Forensic Investigation (DNA) program**.
- Study big game habits through programs such as the **East Slope Mule Deer Study** by providing funds for telemetry equipment.
- **Provide Navigation Aids** to enhance OSP's ability to catch bad guys, help biologist make game counting more efficient & effective while keeping troopers safe.
- Study and prevent spread of disease through projects such as Oregon State University's **Deer Hair Loss Syndrome Project**.

That being said, TAO believes that Oregon has a viable wolf plan which serves the diverse needs of the entire (people) population of Oregon. That ranges from simply hearing or perhaps even seeing a wolf in the wild to protecting the big game resources we, as sportsmen and women, have grown and enjoy as well as ensuring that livestock producers are able to protect their livelihood.

Like other sports groups and producers, we do not wish to see years of time and money invested to be tossed to the wind because there are others that believe large apex predators such as wolves, cougars and bears should go largely unchecked relative to their balance with Oregon's big game resources we as sportsmen have given so much to enhance.

We ask that you stick with the ODFW WOLF PLAN and allow science to dictate the schedule and ultimate delisting of the wolf.

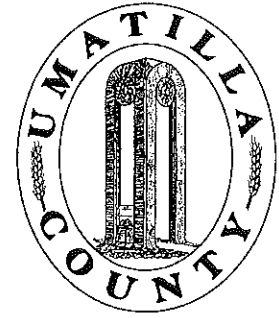
Sincerely,

Rich Thompson
Newberg, Oregon
Director, Traditional Archers of Oregon

Visit our website at www.taoregon.com

Umatilla County

Board of County Commissioners



Commissioners

George L. Murdock
541-278-6202

W. Lawrence Givens
541-278-6203

William J. Elfering
541-278-6201

Executive Secretary
Melinda Slatt
541-278-6204

County Counsel
Douglas Olsen
541-278-6208

Budget Officer
Bob Heffner
541-278-6209

October 5, 2014

To Whom It May Concern:

The Umatilla County Board of Commissioners strongly encourages the Oregon Department of Fish and Wildlife to move forward with the delisting of wolves in this State as prescribed in the Wolf Conservation and Management Plan. It is our understanding there is a presence of four breeding pairs and has been for the last three years which meets the initial goal established in the plan.

Since the criteria for consideration of delisting has now been met, this permits the ODFW to proceed with delisting.

Umatilla County depends primarily on agriculture for its economic viability and cattle and calves are among the major products produced in the county. As a matter of fact, cattle and calves are Oregon's second largest agricultural product.

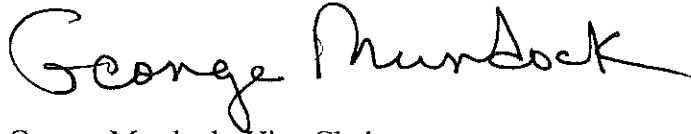
The re-introduction of wolves in Eastern Oregon has provided a major threat to the livelihood of our farmers and ranchers and will continue to be a threat in the future. For this reason, it is important the integrity of the wolf management plan be maintained through the delisting process and that there is a continuation of efforts to protect our farmers and ranchers.

We support the Oregon Cattlemen's Association and the Umatilla County Cattlemen's Association in their efforts to keep the Senate Environment & Natural Resources Committee apprised of the current status of the plan and Oregon's wolf population. We also support the efforts of these two organizations as they advocate for the appropriate next steps in the process for delisting the Gray Wolf under the Oregon Endangered Species List.

It is our understanding you are meeting October 9-10 in Central Point. We are hopeful this matter will be on your agenda and that you will consider this important matter.

Re: Wolf Delisting
October 5, 2014
Page 2

Respectfully Submitted – Umatilla County Board of Commissioners – William J. Elfering, W.
Lawrence Givens, and George Murdock.

A handwritten signature in black ink that reads "George Murdock". The signature is written in a cursive style with a large, prominent "G" at the beginning.

George Murdock, Vice Chair

GM/ms



**OREGON CHAPTER
OF THE WILDLIFE SOCIETY**
PO BOX 2378
CORVALLIS, OR 97339

September 30, 2014

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

Dear Commissioners:

The Oregon Chapter of the Wildlife Society is an organization of professional biologists, land managers, scientists, and others interested in wildlife issues that promote the conservation and wise management of natural resources in Oregon. Part of our mission is to educate and inform the public on topics important to the conservation of natural resources and to promote decision-making with science-based information.

At the September 5th Fish and Wildlife Commission meeting in Joseph, Oregon, representatives for the Oregon Cattlemen's Association requested that ODFW provide livestock owners with specific telemetry location data for wolves. We believe the release of this data is not only inconsistent with ODFW's mandate to manage wolves effectively in the state of Oregon, it is contrary to professionally accepted procedures for how telemetry data are managed. Telemetry is a tool used by wildlife professionals for two general purposes; research and monitoring. The location data generated from this technology is collected for specific purposes intended to increase our knowledge or to improve our ability to manage. There are numerous ways these data can be misused or used by individuals for personal gain, which are counter to wise and ethical wildlife management.

Data from individual animals in scientific studies are not provided to specific user groups or the general public because the "raw data" need to be analyzed to allow proper interpretation of the results; information (e.g., raptor nest sites, threatened and endangered species locations, radio-collared wildlife) may be "sensitive" and release of such information could lead to inadvertent (e.g., enthusiastic wildlife observers) or intentional (e.g., poachers) harm to the animals of interest. Furthermore, the release of specific location data could set a dangerous precedent by establishing an expectation that telemetry data can be made available to the general public for a variety of uses.

For example, the ODFW raffles and auctions big game hunting tags each year that generate large amounts of money and public interest. If telemetry data are provided to one special interest group for one species, this opens the door for raffle or auction tag winners to request similar data for the species they are pursuing. The use of telemetry data for hunting is counter to the fair chase doctrine that is fundamentally important to ethical hunters and anglers.

For the above reasons, principal investigators of a study or managers responsible for these data must limit the review of raw data to those professionals needed to accomplish the objectives of their work. In conclusion, the ORTWS recommends that the Oregon Fish and Wildlife Commission does not provide the location-specific telemetry data for wolves (or any other species) in Oregon.

Respectfully,


Fran Cafferata Coe

ORTWS President 2014-2015

Oregon Hunters Association

30490 SW Rogue Lane #3112

Wilsonville, Oregon 97070

Email:alvinelkins@yahoo.com

Phone: 503.780.6824

Oregon Department of Fish and Wildlife Commission
Jackson County Fairgrounds & Exposition Park
Mace Watchable Wildlife Center, 1 Penninger Road
Central Point, Oregon 97502

October 9th and 10th 2014

Chair Levy and Members of the Commission:

For the record, I am Al Elkins representing the Oregon Hunters Association. The Oregon Hunters Association is a 12,000 member Oregon based association. I am here today to speak in support of the wolf plan report and ask the ODFW Commission to begin the plan review in 2015 and as part of that review begin the process of delisting the wolf. As you know, the Oregon Hunters Association was one of the active participants in developing the plan you have before you today.

In essence the Oregon Wolf Plan was a social compact with the citizens of the state. It was a recognition of the Commission's role in protecting and preserving species through the State Endangered Species Program as well as a commitment to delist once the criteria were met. The goal of the plan was "ensure the conservation of gray wolves as required by Oregon law while protecting the social and economic interests of all Oregonians." (p. 2)

The Oregon Administrative Rule adopted to implement the Wolf Plan, specified that the Commission will initiate the rulemaking process to consider delisting when the Phase I conservation population objective for eastern Oregon is met. (p. 26-27).

The Oregon Hunters Association expects that the December survey will demonstrate that the Phase I criteria of four breeding packs in three consecutive years in Eastern Oregon has been met. Four packs have been documented as currently meeting this criteria - 1) Walla Walla Pack; 2) Snake River Pack; 3) Umatilla River Pack; 4) Minam Pack. In addition there have been at least two other breeding packs that have breed for at least three years each between 2008 to the present (Immaha Pack and Wenaha Pack).

The Wolf Plan recognized that four breeding pairs equates to 6-6.5 packs. This number of packs is equivalent to 38.4 to 50.7 wolves. (p. 27). These predictions have been validated by the current 2013 population of 7 packs and what is described as a minimum total of 64 individual wolves.

As evidenced by the 2014 discovery of additional wolves and packs, the numbers are expanding faster than was envisioned in the Wolf Plan. The dispersal of wolves from the northeastern Oregon packs and the establishment of new packs is evidence that the Eastern Oregon population is not at risk.

It is time to initiate the process and place management of wildlife in holistic manner. The gray wolf must be managed as one part of the ecosystem rather than the priority species. Management of apex predators cannot be done while ignoring the impacts on prey species.

The Oregon Hunters Association recommends the delisting process be initiated and that the Commission direct the Department to implement Phase II.

Further, the Oregon Hunters Association recommends the Commission continue to place a priority on research of wolf – prey relations. In early 2013 the department identified research recommendations specific to wolf-ungulate and wolf-predator interactions which included; 1) wolf prey preferences across a variety of ungulate assemblages in northeast Oregon; 2) wolf competition with cougars; and 3) shifts in ungulate habitat utilization. The Department in 2013 initiated a partnership with Oregon State University to provide a Ph. D. student to study wolf-cougar interactions, and wolf predation rates on northeastern Oregon ungulates. Updates should be made available to the public to assist in public awareness and understanding.

That concludes my testimony. I would be glad to answer any questions.

