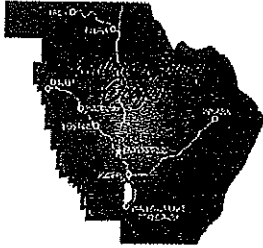


**SUPPLEMENTAL  
PUBLIC CORRESPONDENCE**

**WOLF CONSERVATION &  
MANAGEMENT PLAN**

**Received:  
June 7, 2019**



State of Oregon  
**WALLOWA COUNTY**  
**BOARD of COMMISSIONERS**  
101 S. River Street #301  
Enterprise, Oregon 97828

541-426-4543 ext#1130

Fax: 541-426-0582

Email: [commissioners@co.wallowa.or.us](mailto:commissioners@co.wallowa.or.us)

CHAIRMAN, SUSAN ROBERTS

COMMISSIONER, TODD NASH

COMMISSIONER, JOHN HILLOCK

May 20, 2019

Chair Finley, Director Melcher, Members of the Commission;

Wallowa County has the highest concentration of wolves in the State of Oregon. The first established packs/breeding pairs were also in Wallowa County. We have had more experience with wolf/livestock conflict and depredations than another county in Oregon. The first compensation committee in the state was setup here as well.

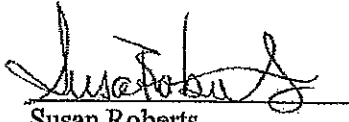
Ten years of conflict with wolves, ten years of growing pains have proven to be challenging for many in our area starting with livestock producers, law enforcement, wildlife services, ODFW biologist, and the environmental community. Decisions are often based on politics of the day rather than evidence and practical application of the Oregon Wolf Plan.

These are the phase III changes we see necessary in the Oregon wolf Management and Conservation Plan:

1. Normalize wolves as another predator on the landscape.
  - Depredation calls made in the field by qualified investigators.
  - This could include, sheriffs, state police, ODFW biologist, wildlife services, or contractor.
2. Continue collaring.
  - Collars are important part of non-lethal deterrents.
  - B. Every wolf in Oregon will come into contact with domestic livestock, and a notification system that allows producers to know where wolves are is the most powerful deterrent we have.
3. Management areas.
  - Establish management areas so that no one place in Oregon becomes overpopulated, and becomes overly burdensome to both wild and domestic ungulates.
4. Notify County government boards, and sheriffs.
  - The current draft of the Plan uses language "as needed". This is an absolute need as the compensation committee has a county commissioner on it. 911 is used as an after hour way to report wolf depredations. The sheriff is often time the first point of contact in setting up investigations.

These are the changes we in Wallowa County need to make an already challenging situation a little more tolerable.

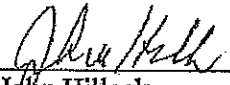
Thanks for your consideration.



Susan Roberts  
Chairman



Todd Nash  
Commissioner



John Hillock  
Commissioner

PETER A. DEFAZIO  
4TH DISTRICT, OREGON

TRANSPORTATION AND  
INFRASTRUCTURE  
CHAIRMAN



Congress of the United States  
House of Representatives

June 7, 2019

PLEASE RESPOND TO:

- 2134 RAYBURN HOUSE OFFICE BUILDING  
WASHINGTON, DC 20515-3704  
(202) 225-6416
- 405 EAST 8TH AVENUE, #2030  
EUGENE, OR 97401  
(541) 465-6732  
1-800-844-9603
- 125 CENTRAL AVENUE, #350  
COOS BAY, OR 97420  
(541) 269-2609
- 612 SE JACKSON STREET, #9  
ROSEBURG, OR 97470  
(541) 440-3523
- defazio.house.gov

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

Dear Commissioners:

I regret I cannot attend today's meeting regarding the consideration of the Oregon Department of Fish and Wildlife proposed wolf plan. However, I wanted the opportunity to express my strong opposition to the draft proposal.

I will focus my comments on two provisions within the proposal I strongly oppose: allowing the public to participate in "Controlled Take;" and once again allowing USDA Wildlife Services (WS) to be part of ODFW livestock depredation investigations. I ask that these provisions be struck from the plan.

"Controlled Take" is defined in the plan as "responsive hunting and trapping when required for management purposes...". The department is contemplating allowing public and private hunters and trappers to assist ODFW in its management response actions. This is an appalling idea that would result in, at best, baseless killing of wolves. It could also result in bad actors intentionally killing wolves that pose no threat. Additionally, the plan does not take into consideration how to hold members of the public accountable should they exploit their authority. As you know, specially-trained ODFW wildlife management personnel have mistakenly killed wolves. To allow the untrained public to take part in management actions is irresponsible.

As you know, in 2010, ODFW ended USDA Wildlife Services' involvement in investigating and confirming livestock depredations. ODFW rightly concluded that Wildlife Services has a track record of indiscriminately killing wildlife, especially wolves. Additionally, their methods and use of poisons and other lethal devices has caused the deaths of hundreds of non-targeted animals such as dogs. In 2017, a Pocatello, Idaho, teenager was

~~lethal devices has caused the deaths of hundreds of non-target~~  
~~animals such as dogs. In 2017, a Postville, Idaho, boy~~  
playing with his dog merely hundreds of yards away from his house  
when his dog activated an M-44 lethal predator control device  
placed by Wildlife Services. His dog suffered a cruel and painful  
death, and the boy was nearly killed, saved only by the direction  
of the wind.

Throughout my entire career I have worked to expose and  
defund USDA Wildlife Services. It would be detrimental to  
wildlife and the reputation of ODFW if this rogue, irresponsible  
agency was allowed to once again take part in depredation  
investigations.

Finally, I want to echo Governor Brown's opposition and  
reiterate my own strong opposition to any endorsement by the  
Oregon Department of Fish and Wildlife of the U.S. Fish and  
Wildlife Service's misguided proposal to delist gray wolves across  
the 48 states.

Sincerely,



PETER DeFAZIO  
Member of Congress

PAD:djw

6-7-19

Good Day

My name is Sheriff Steve Rogers, I am the Sheriff of Wallowa County

My office has been dealing with and investigating Wolf-Livestock depredations for several years. As you know my county has been a hot bed for livestock depredations. Early on we partnered with our Livestock producers, Wildlife Services and ODFW in crafting and implementing a protocol that dealt with investigations of Wolves damaging and killing domestic livestock, and dogs that are the personal property of our citizens, as I see you have mentioned in your 2019 Draft Wolf Plan Update, under strategies.

Because of the distrust most of our livestock producers have with ODFW, they requested that the Wallowa County Sheriffs Office investigate the destruction of their personal property. I agreed to be involved in the investigations and agreed to do a professional and thorough job and we have done that. We thought it was important for Wildlife Services to be involved and ODFW to be involved. For obvious reasons.

At our Oregon State Sheriffs meetings my office has put trainings on regarding this issue on numerous occasions and most of the Sheriffs attending have been interested in being involved in investigations when warranted. A resolution was passed with the Oregon State Sheriffs Association a few years ago addressing their willingness to investigate Wolf Livestock property destruction. I am aware that there is incorrect information being disseminated from ODFW regarding Oregon Sheriffs not wanting to be involved in these investigations. Let me make it clear we as Oregon Sheriffs have every intention of being involved and investigating Wolf-livestock depredations. Our producers expect it.

In your Draft plan you mention your protocol of investigations on page 52 line 41 as to what livestock owners should do if they suspect depredation and request an investigation and that includes "Wildlife Services, ODFW, and USFWS or any combination of these agencies. First of all you have left out Oregon Sheriffs Offices, secondly Wildlife Services is not functioning in this capacity and are told not to get involved in Wolf depredation investigations in Oregon and maybe other States for reasons surrounding a NEEPA study issue and I suspect other political reasons. They now are of no use to our citizens where they once were.

My citizens are keenly aware that their property destruction by Wolves in Oregon and how it is "Investigated, determined and reported" is a political issue and they don't like it. Every time a Wolf kills or damages their livelihood they are financially impacted and seldom compensated. ODFW has no "skin in their financial game" And they see an agency set forth to "manage" an animal that was brought to the lower 48 states from Canada and they understand the lack of willingness to destroy something the State is mandated to manage. When ODFW members and even the Governors natural resource personnel who are not involved in the investigation and collection of evidence weigh in

on the outcome my producers distrust this process and for good reason. I won't even get into the issue of some ODFW personnel inability to gather and disseminate physical evidence.

Let me be clear. Oregon Sheriffs who deal with Wolf-livestock depredations will be involved in investigations.

Thank You

6-7-19

Chair Finley, members of the commission, for the record, my name is Jerome Rosa and I am the Executive Director of the Oregon Cattlemen's Association.

Agriculture is our states' second largest economic driver and BEEF is the state's largest agricultural industry at nearly one billion dollars per year. As the voice of the Beef Industry OCA and its statewide membership of over 1800 members has been an association for over 106 years.

First of all OCA would like to thank ODFW for its time and effort in assembling the Oregon Wolf Plan. Our members throughout the state have suffered tremendous losses both emotional and economical since the decision to reintroduce wolves in Oregon was forced upon us. In spite of these emotional and economical hardships the Oregon Cattlemen's Association stood alongside the ODFW from start to finish in the facilitated process of developing the Oregon Wolf Plan.

OCA has held steadfast in its position of three basic points:

- 1) Management Area's -- no one place in Oregon becomes overpopulated and is burdensome to both wild and domestic ungulates. Maximum wolf numbers in each management area is yet to be addressed.
- 2) Increased Collaring -- Currently, the level of collars on wolves in Oregon is woefully inferior. Producers' most effective non-lethal deterrent is location knowledge of when necessary to protect their cattle. A minimum of one collar in each pack is a goal yet to be achieved.
- 3) Real time on the ground evidence based depredation calls. Often depredation calls can take up to a week to occur, this is a practice that must be improved if ranchers are to hold any confidence in the plan.

Finally, do not underestimate the importance of this issue based on the limited size of our showing today. In a very tough economic time and beef prices having plummeted, the luxury of being able to drive, often hundreds of miles, to testify is not economically feasible. Please take note that the Oregon Cattlemen's Association, though not content with many parts of the Oregon Wolf Plan. Continues to work toward a future plan Oregonians can live with on this issue.



June 7, 2019

**Testimony of the Center for Biological Diversity on the 2019 Draft Oregon Wolf Plan Update**

Chair Finley and Members of the Commission:

My name is Amaroq Weiss. I live in Petaluma, California, previously lived in Oregon, am a biologist and former attorney, and cover wolf issues in Oregon, California and Washington for the Center for Biological Diversity. My comments today are delivered on behalf of our nearly 30,000 Oregon members and supporters.

Science finds that wolf hunting and trapping is ineffective for solving wolf-livestock conflicts, reduces social tolerance for wolves and is associated with increased wolf poaching, can be highly destructive to a wolf pack's social structure, cohesion, reproductive success and pup survival, and impair genetic processes and the ecosystem functions wolves provide.

72.4 percent of Oregonians oppose trophy hunting of wolves; 81.9 percent believe poaching, not wolves, poses the greatest threat to deer and elk populations and hunting opportunities; and 81.1 percent think that prosecuting poachers, rather than hunting wolves, would be more effective to promote healthy deer and elk populations and hunting opportunities.

The North American Model of Wildlife Management – which touts hunting as a necessary conservation tool and is the model the Department professes to use broadly for wildlife management in Oregon -- is fundamentally flawed.

Some have argued the Commission can't change what's currently in the Plan – Controlled Take -- hunting and trapping of wolves by private citizens.

Yet when everything says that wolf hunting and trapping is wrong, is this Commission actually going to say it cannot change that? In the face of overwhelming proof it is wrong and in the face of overwhelming public opposition?

The Commission can do it. Everyone knows you can do it.

In 2015, conservation groups expressed concern that state-delisting prior to conducting the five-year Wolf Plan update would mean wolves would be delisted without knowing what Plan safeguards would be in place. In response, at a public meeting, then-Commissioner Weber stated that the Commission can make any changes it wants to the Wolf Plan, whenever it wants.

Look back at this Commission's decision to not rubber stamp the Department's proposal to expand the spring bear hunt.

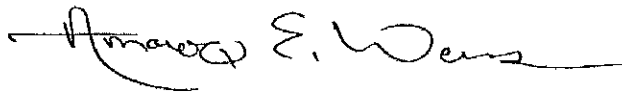
Look at your decision just last year to uplist and then downlist the Marbeled Murrelet.

The Commission has made changes to management plans, protections and hunts in the past. It can do it now.

Science and the public say it should be changed.

Therefore it needs to be changed.

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

June 7, 2019

Chair Finley, Director Melcher, Members of the Commission;

I am Veril Nelson, Rancher and retired Agriculture Science teacher. I have taught classes in Animal Science, Plant Science, Pasture management, Forestry and Wildlife management for 25 years. Also, I am the western Oregon Co-chair of the Wolf Committee for Oregon Cattleman's Association. I am here to discuss some of the economics of wolves on livestock producers in Oregon. According to the current plan all the economic burden of wolves on Oregon Landscape are born by ranchers. We suffer killed animals, weight loss, reproductive failure and have the burden of labor and cost of nonlethal controls.

A recent study in Idaho indicated many unforeseen impacts of wolves on ranchers, including stressed livestock more prone to sickness, post-traumatic stress disorder similar to soldiers, poor use of forage because cattle refuse to go in areas inhabited by wolves, cattle attack when stock dogs are used which requires more labor when gathering stock. Additionally, deer and elk herds move to Ag. Lands for protection.

The wolf advocates will say that's OK because ranchers are compensated. NOT TRUE. Ranchers can get compensation for confirmed and probable kills by wolves, but the bar is set so high for confirmed kills, a small percentage of wolf kills are actually confirmed. Some cattle are killed by being run to death and show no signs of attack. Ranchers in wolf areas experience 60 to 100 pound less weight on calves, 150 pound less weight less on cows and a 10 percent reproductive failure on cows, NO compensation is allowed for those losses. Last year loss requests in Oregon were \$500,000, \$114,000 were granted.

One rancher in Wallowa County requested \$51,460 in losses and received only \$6889 in compensation.

Ranchers in Douglas County are worried about wolves interfering with livestock production and are looking at other crops. However, much of the private lands are only suitable for pastures and livestock. If we can't protect our livestock and ranchers have to quit they fear land values will drop or be nonproductive. I understand most Oregonians are interested in the Oregon Farm Heritage Foundation and keeping Agriculture Lands in Ag Production rather than commercial or residential use. How do we do this if ranching is not economically viable business? The proposed plan needs to be less protective of wolves and more protective of Livestock!!!

Thank you.

Veril Nelson

Oregon Cattlemen's Association

June 6, 2019

My name is Ted Birdseye and I live in Prospect, located in Jackson County, Oregon. My story has been well-documented in the media since January 2018. I am a small family rancher and run about 200 head of cattle on my 300-acre ranch. In January 2018, the ODFW confirmed three separate calves were attacked and mutilated on my ranch within one week. My cattle continued to be stalked, almost nightly. I had four additional calves mutilated and killed in subsequent attacks throughout 2018 despite my ongoing efforts to deter or scare away this well-known Rogue Pack. I am currently using every tool available to scare or deter these predators from stalking and preying on my cattle. In cooperation with Federal and State Wildlife Biologists, we installed electric fencing along my entire 300 acres with fladry flags tied along the wire, motion-detecting strobe lights, adopted two Tibetan Mastiffs as guard dogs and had staffers from Federal Wildlife Services sleep in my pastures to deter predation. In January 2019, several inflatable giant wind dancers were installed as an additional deterrent. In March 2019, the wolves continued to stalk my ranch and viciously killed one of my guard dogs. In April 2019, another calf was killed and partially eaten alive. The wolf deterrents are only effective for short periods of time and nothing has been effective beyond 90 days. We are running out of tools. We frequently have wolves inside our home perimeter, 60 yards from the front door, they have no fear of humans. My family and I live in fear and rarely sleep through the night. Our concern for the safety of the livestock as well as my family and pets never subside knowing the Pack are still close enough to hear their howls at night. There have been eleven confirmed wolf attacks on livestock and pets in Jackson County since September 2018, seven of which were on my ranch. An effective and well-defined Oregon Wolf Plan is imperative to the future of all of us.

Ted Birdseye  
Prospect, OR

**Roxann B Borisch**

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**From:** Forest Web of Cottage Grove <forestweb.cg@gmail.com>  
**Sent:** Thursday, June 6, 2019 11:31 PM  
**To:** odfw.commission@state.or.us  
**Subject:** Comments for 06-07-2019 Wolf Management Plan Hearing  
**Attachments:** 2019-06-06 ODFW Comments.pdf; 2017-05-25 ODFW Comments.pdf

Attached, you will a copy of our written comments on the Wolf Conservation & Management Plan that will be submitted at the public hearing tomorrow. For further reference, we have also attached a copy of our comments on the Management Plan in May of 2017.

Sincerely,  
Cristina Hubbard, Executive Director  
Forest Web of Cottage Grove

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***Forest Web of Cottage Grove***  
**[www.forestweb-cg.org](http://www.forestweb-cg.org)**

***Forests precede civilizations and deserts follow them.***  
**Francois-Rene de Chateaubriand**

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# Forest Web of Cottage Grove

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PO Box 853 Cottage Grove, Oregon 97424

Email: [forestweb.cg@gmail.com](mailto:forestweb.cg@gmail.com) Website: [forestweb-cg.org](http://forestweb-cg.org)

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Oregon Department of Fish and Wildlife Commission  
[odfw.commission@state.or.us](mailto:odfw.commission@state.or.us)

Re: Comments on the Wolf Conservation & Management Plan

June 6, 2019

Chair Finley and Esteemed Members of the Board:

Forest Web of Cottage Grove is an all-volunteer grassroots organization located in Cottage Grove, Oregon. We are submitting these comments on the Wolf Conservation & Management Plan on behalf of over 3,800 of our supporters and volunteers. Our primary work involves the protection of old-growth and mature forests in Oregon as well as the preservation of endangered species that help to maintain the health of these ecosystems which are critical to mitigating the damaging effects of Climate Change. As we have written in our previous comments to ODFW on wolf recovery, science has proven apex predators such as wolves are a vital part of any ecosystem they inhabit. As in Yellowstone, wolves are key to rehabilitating damaged ecosystems and improving the biodiversity of those systems.

While we appreciate many of the efforts made on behalf of wolf recovery in Oregon by ODFW, such as the diligence shown in investigating claims of wolf predation on livestock, we have a number of concerns with regard to the plan being presented to you for approval.

In a letter sent to Governor Kate Brown, Cascadia Wildlands, Center for Biological Diversity, Defenders of Wildlife, and Oregon Wild expressed their disapproval of the Wolf Conservation & Management Plan stakeholder process and draft plan, stating “...*current proposed resolutions to be reflected in the Plan update are not only weaker than previous drafts, but highlight the failure of this flawed stakeholder process to develop a plan that represents the values of Oregonians. After reviewing ODFW’s latest draft, it is clear the agency’s intention is to find ways to kill wolves faster, not prioritize conflict prevention through non-lethal measures.*” This stakeholders’ group was intended to allow input from all involved parties on the Management Plan. However, all of the environmental organizations represented left the table as it was clear their efforts for a science-based recovery plan was being ignored. This brings into serious question the validity of the plan being presented to you at this time.

Our elected officials are speaking out against the latest version of the Management Plan. Congressmen Peter DeFazio and Earl Blumenauer, stated their concerns and objections in an opinion piece recently published in *The Oregonian*, stating the following, “*Oregon’s Department of Fish and Wildlife — the agency tasked with protecting and enhancing Oregon’s wildlife for present and future generations—continues to unjustifiably focus on the killing of wolves as a predator control tactic. With a biased commission overseeing the agency and a director willing to sabotage the species instead of treating it as an important part of our*

*environment, the fish and wildlife department has lost its way....The agency's draft wolf plan opens the door to trophy hunting and trapping, guts requirements for non-lethal deterrence, and makes it easier to kill wolves accused of chronic depredation of livestock..."*

Lethal methods are not a scientifically proven solution of dealing with livestock predation. There is no evidence they have any impact and may actually increase incidents of predation. The family dynamics of wolf packs are similar to those of human families, when the family unit is broken by the death of adult members of the pack, younger wolves, like children, are left without the structure and guidance provided by adult nurturing and supervision. This can lead to more adverse interactions between wolves and livestock.

With the threat of wolves being delisted as an endangered species by the Federal government, it is critical that ODFW take a strong stand on protecting wolves in Oregon. The role of a keystone species is vital to the maintenance of a healthy ecosystem and when an apex predator is removed it creates a serious imbalance. The United Nations just released the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services' (IPBES) *Global Assessment Report on Biodiversity and Ecosystem Services*. The report, showing that 1,000,000 species are in serious threat of extinction, is the most comprehensive ever completed. The report included 31 plant and animal species in Oregon faced with extinction. With the new information provided in this critical report, using any form of lethal methods with wolves in Oregon, when their recovery is still in question, is a mistake.

We listed all of our specific concerns with individual aspects with Draft Management Plan in our comments submitted on May 25th, 2017. The most recent version of the Plan leaves us with more concerns and questions than answers.

In the Continental United States, wolves only occupy 10% of their original territory—with a population of only 137 wolves, how can ODFW claim a victory for wolf recovery in Oregon? Where is the science that proves 137 wolves is a viable population? Where is the science to support, trapping, wolf hunts, or other lethal methods for managing Oregon's wolves? We are concerned the views and opinions from the cattle industry, which uses fear and misinformation in their anti-wolf campaigns, is determining the fate of a species. We could cite that the majority of Oregonians support wolf recovery, but this is not a popularity contest. Again, we ask where is the science in this plan?

In conclusion, we ask you to not approve the current version of the Wolf Conservation & Management Plan. Send it back for revision and a thorough scientific review so we can have a plan that will ensure and safeguard true wolf recovery in Oregon.

Sincerely,

Cristina Hubbard, Executive Director  
*Forest Web of Cottage Grove*

# Forest Web of Cottage Grove

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PO Box 853 Cottage Grove, Oregon 97424

Email: [forestweb.cg@gmail.com](mailto:forestweb.cg@gmail.com) Website: [forestweb-cg.org](http://forestweb-cg.org)

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Oregon Department of Fish and Wildlife Commission  
[odfw.commission@state.or.us](mailto:odfw.commission@state.or.us)

Re: Comments on the Draft Management Plan for Grey Wolves in Oregon

May 25th, 2017

Chair Finley and Esteemed Members of the Board:

## **Introduction**

Thank you for your efforts to ensure the conservation of grey wolves as required by Oregon law while protecting the social and economic interests of all Oregonians. Finding a path through the tangled branches of competing priorities, agendas, and studies they fund must be an arduous task. With regard to your current draft, it does seem to favor the interests of certain well organized groups of Oregonians and their allies in bordering states, specifically ranchers and trophy hunters, in that it invites greater participation from Wildlife Services, a federal agency of scandalous repute serving agricultural producers, and allows for more predation of wolves by humans than has been previously tolerated in our state. There are 5 points in the plan in particular which seem to be tailored to the social and economic interests of these groups. The first portion of these comments is concerned with these 5 points while the second portion focuses on what are intended as helpful suggestions. These comments were revised and expanded after attending the hearing in Portland on May 19th, 2017.

## **5 Points of Concern**

First, Chapter II, Section F of the Draft sets the stage for private individuals to hunt wolves in Oregon. The section does begin with an eloquent acknowledgement of the historical result of humans hunting wolves however nothing in the loose framework laid out in the section provides any evidence for why a different outcome other than species extinction should be expected. The section talks about "certain circumstances" and states the intentions of the Oregon Department of Fish and Wildlife (here after referred to as the agency) but never goes into specifics about exactly who, how, where, and why humans hunting wolves would be appropriate. The agency may be trying to retain some latitude in future decision making here which is exactly the wrong thing to do if agency accountability and conservation of this previously exterminated species are real priorities. Further more, new research shows that allowing individuals to kill specially regulated species will increase the likelihood of poaching rather than increasing social tolerance. (Chapron G, Treves A. 2016 Blood does not buy goodwill: allowing culling increases poaching of a large carnivore. Proc. R. Soc. B 283: 20152939. <http://dx.doi.org/10.1098/rspb.2015.2939>)

Oregon is a state that places a high value on the rights of private property owners and their autonomy over their own lands. As a native Oregonian, I share this value. That said, much of the land in our state is public land including vast areas where ranchers feed their herds and hunters hunt. At the Portland Hearing, Chair Finley and numerous speakers from all sides acknowledged

that “Wolf is once again part of the landscape” in Oregon. The draft plan is written based on the assumption this is true. As part of the landscape, wolf has a right to exist. Wolf occasionally eats furry quadrupeds. Wolf should not be killed on public land where wolf belongs for doing what wolf does. Forest Web of Cottage Grove does not condone the taking of wolves on public land except in cases of self defense where self is expanded to include one’s traveling companions and domesticated animals and defense is taken to mean in response to an imminent threat of death or grievous injury.

Ranchers who graze their chattel on public lands must take responsibility for their property and stop expecting the government to do it for them. This is little more than corporate welfare. Any hope that reimbursing ranchers for lost animals was going to make them more tolerant of wolves has fled. Perhaps ranchers need to hire range riders to protect their herds. Despite gratitude expressed at the hearing by agriculturalists, this is not the Department of People and Problems; it is supposed to be the Department of Fish and Wildlife.

Second, Chapter IV, Section E appears to be a solution in search of a problem and conflicts with earlier stated management objectives. First off, by the agency’s own report in the previous section, ungulates, especially elk, are generally thriving in the face of wolf reintroduction. The plan notes that ungulate populations have not declined. It also notes that some species have become more guarded and watchful with wolves back on the landscape, a potential hardship for hunters. As a native Oregonian who has gone on more than one family hunt on the west side, I can tell you that getting a deer or an elk is not supposed to be easy. We do not hunt recently released animals from elevated platforms out here. If you want an easy meal, go to the grocery store. In my experience, Oregon hunters enjoy a challenge, thus the hunting.

Chapter IV, Section E sets out circumstances under which wolves might be relocated if they are impacting ungulate populations too heavily without giving specific measures for what too heavily might be. This conflicts directly with the dispersal objective on pg. 7 of creating a spacial dispersal model to aid in future planning. Relocating wolves may create havoc in wolf packs, especially if an alpha is relocated, leading to a potential population boom as ungoverned wolves couple off and produce pups. Relocation for fear that wolves are eating too many ungulates could easily make the problem worse.

More attention to dispersal is needed in the plan. The creation of wildlife corridors and ways for wolves to avoid cars seemed to be missing as Dr. Wolf pointed out at the hearing. Also, the section that talked about goals of expansion and connectivity on page 8 seemed to be saying that these goals were being met but also that the vast majority of known wolves who left our state were killed. This paradoxical presentation of information was baffling. Please elaborate in the next draft on how these wolves dispersing only to be shot or run over equals success.

Third, Chapter III, Section D emphasizes the use of non-lethal methods to address wolf conflict with livestock and other human interests yet much of the section is devoted to delineating when wolves can legally be killed. The specificity in describing the circumstances for legal take is impressive. The same level of specificity should be reflected in the plan regarding when to use which methods of non-lethal deterrents. More specific guidance from the agency in the plan could prevent a lot of conflict later on between environmentalists and ranchers about whether a good faith effort was made to avoid killing a wolf. An ounce of red tape is better than a pound of litigation.

The draft plan also lays out guidelines for when lethal take or killing a wolf would be appropriate in cases of chronic depredation. We disagree that killing a wolf for chronic depredation is

appropriate in that it is generally not effective at stopping trends of chronic depredation (see the agency draft, page 38 and also Effects of Wolf Mortality on Livestock Depredations Robert B. Wielgus, Kaylie A. Peebles Published: December 3, 2014 <http://dx.doi.org/10.1371/journal.pone.0113505>). The draft plan sites older research that gives conflicting information on whether killing a wolf in these cases will help relieve social pressures and create greater tolerance for wolves in general. The Agency needs to read the latest research on this topic which indicates that killing wolves only creates tolerance for killing wolves. (Chapron G, Treves A. 2016 Blood does not buy goodwill: allowing culling increases poaching of a large carnivore. Proc. R. Soc. B 283: 20152939. <http://dx.doi.org/10.1098/rspb.2015.2939>) Rather than killing the chronic canine offender, the compensation program should set forth rules for continuing to subsidize ranchers harmed by the offender on private land when the rancher is taking all appropriate non-lethal measures to avoid further predation. The next draft plan should also include a section instructing ranchers on how to use non-lethal measures to deal with chronic depredation including the onerous task of greater supervision of one's flock or herd. The draft plan does include provisions for killing a wolf caught in the act after all.

Finally, Chapter III, Section E discusses when Wildlife Services may be asked to investigate alleged wolf depredation events. A note indicates they will be allowed to assist with lethal removal of wolves pending a NEPA process. Wildlife Services is the "least accountable government agency" Congressman Peter Defazio has ever seen and he has been in government a very long time. Their lack of public transparency is legendary; the unwieldy misuse of power is resultant. Asking Wildlife Services to investigate wolf depredations is like appointing one's own FBI Director to investigate in a case of alleged presidential malfeasance in that it does not inspire the general public with confidence in the legitimacy of the process or the government. In 2015, Wildlife Services "killed more than 250,000 animals in Idaho alone, using a shocking variety of brutal methods from aerial gunning to cyanide landmines, neck snares, body-crushing traps, poisoned bait and even deadly gas canisters that kill whole families of animals where they sleep" according to the Center for Biological Diversity who is suing them. Only this February, they happened to kill a wolf, OR-48, who was found near one of their cyanide bombs. It was intended to harm coyotes so perhaps we should not be concerned. But wait, they also hospitalized a boy and killed his family dog with a similar device earlier this year. The draft plan notes more funds may be needed to entice their continued help with managing wolves however "Gov. Kate Brown's budget proposes \$940,280 in cuts to funding of Wildlife Services predator control programs through the Oregon Department of Agriculture and Oregon Department of Fish and Wildlife" according to the Register Guard, Mar. 27, 2017. In short, until the culture at Wildlife Services changes such that their reputation can be salvaged, we do not want them participating in wolf management in our state. We at Forest Web of Cottage Grove, and we the people of Oregon through our elected officials, do not want Wildlife Services involved in wolf management in Oregon. Please take them out of the next draft.

## **2 Suggestions**

To address the problem of bias in the draft plan, new revenue streams would be very helpful. That the agency draws much of its funding from licenses for hunting and fishing cannot be denied. Such a financial stake in conversation appears to have given the voices of trophy hunters unfair amplification since hunting of wolves by private individuals is now being considered. To rebalance the scale, the agency needs to offer people outside the hunting community a chance to put their money where their mouths are. After I, and two other commenters, mentioned the need for a "No-Hunting Tag" or "Conservation Pass," a commissioner reminded us all that Habitat Conservation Stamps can be bought for \$20 or \$100 should we want the governor's signature on

a print of the stamp. I tried to buy that today. I spent half an hour on the ODF&W web page in the attempt and came up empty handed. The stamp had to be searched for by name as it was not listed among licenses and tags. When I finally found it, I was unable to buy it on line. I downloaded the pdf with the order form and filled out half of it before discovering I was unable to fill in the section with my credit card number. Perhaps I will have better luck at Bi-Mart. The point is that the program currently offered for conservationists is not advertised enough or accessed with ease. Also, a hunting license comes with a parking permit while a signed print does not. Is that fair? Perhaps the greater price of a hunting permit is the justification. If so, there needs to be a more expensive option for people who do not hunt so they can buy something to put on the bumpers of their Priuses that will give them full bragging rights at the parking lot of any Whole Foods. If environmental enthusiasts were given the option of buying the signed print with a Fierce Green Fire Conservation Pass to slap on their cars, it would sell. If the Agency would be so bold as to trial this program for 6 months without employing Wildlife Services to investigate wolf predation, I believe enough money could be raised from non-hunting wildlife enthusiasts to fund 2 more field biologist for Eastern Oregon. The agency would need to make it public that they were trialing this revenue stream to see if excluding Wildlife Services from wolf management in Oregon was even an option. The agency would need to be explicit at the beginning of the trial about how much money was needed. If the agency was willing to take this bold step, groups like the Center for Biological Diversity, Oregon Wild, Cascadia Wildlands and others would get on board and promote the heck out of the Conservation Pass. Forest Web would proudly be the first to blast an agency campaign around this idea to all our followers on social media. The Conservation Pass should cost the same as a hunting license with some \$180 bonus level of participation to mirror the Sportsman's Pack and come with a parking pass for your special areas just like all hunting licenses only this parking pass would look different, perhaps showing off the art from the habitat stamp, conferring full one-upmanship upon any urbanite affluent and dedicated enough to land such a prize.

Also regarding funding, the need for more research in so many areas of wolf recovery is striking. I was particularly disappointed by the lack of research on the efficacy of non-lethal deterrents to predation of livestock with wild wolves.

The Center for Biological Diversity offered a worthy critique of the agency's review of the literature in the current draft plan. A review of the literature is the cheapest form of research in that it only costs the time of the researcher and sometimes fees for access to materials. If the agency were to extend an invitation to the Center to contribute a review of what the Center finds to be the best, most recent, peer reviewed science pertinent to wolf recovery and management, surely they would jump at the chance. Such an invitation with the same criteria would need to be extended to the Farm Bureau or the Cattleman's Association in order to preserve fairness. The two reviews could be compiled and cross referenced by a less biased entity like the agency or a community partner like the School of Forestry at Oregon State University.

Finally, if there is anything at all we can do to help with the process of planning or implementing a plan to ensure the conservation of grey wolves in Oregon, please let us know.

Sincerely,

Mary Grace Brogdon, Public Lands Director  
Cristina Hubbard, Executive Director  
***Forest Web of Cottage Grove***

## Roxann B Borisch

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**From:** Sea Lion <sealiondefensebrigade@gmail.com>  
**Sent:** Friday, June 7, 2019 12:12 AM  
**To:** ODFW Commission  
**Subject:** Canis Lupus

Director Melcher & Chair Finley ODFW Fish and Wildlife Commissioners

If you were a wolf you will be ecologically sound and healthy if ungulate populations are not reduced. If you were a wolf you would not eat ungulates into extinction like the domestic bovines and domestic sheep will. And as bovine your odds of being eaten by wolves are much lower than you being sold off for the slaughter and as the domestic sheep and bovine populations soar on public & on private landscapes across Oregon these species undermine the productivity of wild lands, forest, & grasslands as being able to meet the demands of wildlife that need habitat such as ungulates, sage grouse and wolves do.

On the other hand if you were a wolf and could not sustain and maintain your own Canis Lupus populations in Oregon separate from ODFW's Management of the ungulate populations in Oregon as a wolf that leaves you pretty unsuccessful as a top predator. You recognize that any use of language to connect reductions in the ungulate populations and or calf to mom ratios in Oregon as being directly, and or most likely caused by chronic wolf depredation as not being beneficial for you and your pack.

Moreover with all the various reasons that might contribute to a reduction in ungulate populations in Oregon the wolves ought not to be targeted for lethal take and nor sold off as acceptable take to other agents outside of ODFW and ought not ever to be sold off for hunting opportunities and or because there is a reduction in the ungulate populations or bovine and domestic sheep depredation in Oregon.

Altogether, the exponential growth of the human populations in the Pacific Northwest Bioregion and current forestry practices cause a far bigger impact to ungulate populations than the wolves do. There can be a reduction in the ungulate populations in Oregon by the Ariel spraying of glyphosate after a clear cut and by ungulate populations dying due to the wasting disease. There are many ways the ungulate populations in Oregon may be reduced and ODFW ought not connect these reductions solely to depredation by wolves instead of let us say, loss of important habitat range and human and bovine and domestic sheep encroachment upon ungulate and wolf habitats has caused many species to go extinct or near extinct.

Therefore always non-lethal measures ought to be deployed and employed as the only means to lower bovine and wolves interactions as non lethal measures have been shown to be very effective in lowering depredation by wolves upon domestic livestock left unattended in the wild.

Non-lethal measures ought to be employed first by ranchers and ODFW's wolf biologists ought to work together to educate, and advocate for non-lethal measures as a means to lower wolf and domestic sheep and bovine interactions across Oregon.

In addition, the term chronic implies to long term and by no means are two depredation events in nine months—chronic—considering, just how many bovine hamburgers 461,000 hunters and anglers ODFW license holders probably eat yearly. Do you know that it takes roughly 2,100 gallons of water to produce one pound of cow hamburger, and we know that one cow can release up to one hundred and twenty pounds of fecal waste and urine a day across Oregon without any sewer filtration system leaving Oregon lands bovine urine soaked. Bovine, domestic sheep and chicken waste is currently piling up at an alarming rate enough to drown out many populations of wildlife species, waterways and wild lands across Oregon.

In the end if you were a wolf you play an important job in maintaining the health and productivity of the Pacific Northwest ecology for ungulates and others. Top predators such as you have the ability to alter a river's flow as the introduction of wolves back into Yellow Stone National Park have. Wolves on the land create a trophic cascading affect which has the ability to influence ungulate populations and the ability to influence the landscape down to the plant life. The ungulate populations eat plants and by removing wolves and humans filling wolf and ungulate habitats with bovines and domestic sheep causes an inequity for wildlife such as wolves that have to eat and the wildlife and wild lands that which they rely on must sustain available prey for their survival.

Thank you for your time and consideration.

For the wolves and the red roses  
Ninette Jones  
Portland, Oregon

**Roxann B Borisch**

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**From:** kelly heichel <kellyheichel@gmail.com>  
**Sent:** Friday, June 7, 2019 2:58 AM  
**To:** odfw.commission@state.or.us  
**Subject:** Wolf Management Plan

I am OPPOSED to any wolf management plan that allows trophy hunting and trapping of Oregon's wolves!

Thank you,  
Kelly Heichel

**Roxann B Borisch**

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**From:** Mary Leoni <Maryleoni@outlook.com>  
**Sent:** Friday, June 7, 2019 7:41 AM  
**To:** ODFW Commission  
**Subject:** Wolf hunting

I am passionately opposed to the plan to hunt wolves in Oregon. These animals are complex, intelligent, beautiful and social, and they have a right to live in their homelands.

Some livestock loss will naturally occur when you run cattle in wolf country, but we are generous to offer compensation to those ranchers. Killing wolves is the only issue I'm concerned with enough to contact you.

Please protect the few wolves who have managed to survive our exterminations of the past!  
Mary Leoni,  
Eugene

## Roxann B Borisch

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**From:** Pratt, Kris <Kris.Pratt@mail.house.gov>  
**Sent:** Friday, June 7, 2019 8:06 AM  
**To:** Whelan, Dan; odfw.commission@state.or.us  
**Subject:** UPDATED Public comment by Congressman Peter DeFazio regarding draft Wolf Management Plan  
**Attachments:** ANIM PAD letter testimony ODFW Wolf Plan 6.7.19.pdf

Dear Oregon Fish and Wildlife Commission,

Please see the UPDATED attached public comment from Congressman Peter DeFazio (OR-04) regarding the draft Oregon Wolf Conservation and Management Plan. I plan to attend today's meeting to read the attached letter.

Thank you.

*Kris "KP" Pratt  
Legislative Director  
Congressman Peter DeFazio (OR-4)  
2134 Rayburn House Office Building  
202-225-6416*

PETER A. DEFAZIO  
4TH DISTRICT, OREGON

TRANSPORTATION AND  
INFRASTRUCTURE  
CHAIRMAN



## Congress of the United States House of Representatives

June 7, 2019

Oregon Department of Fish and Wildlife  
4034 Fairview Industrial Dr. SE  
Salem, OR 97302

Oregon Fish and Wildlife Commissioners:

I regret I cannot attend today's meeting regarding the consideration of the Oregon Department of Wildlife proposed wolf plan. However, I wanted to the opportunity to express my strong opposition to the draft proposal.

I will focus my comments on two provisions within the proposal I strongly oppose: allowing the public to participate in "Controlled Take;" and once again allowing USDA Wildlife Services to be a part of ODFW livestock depredation investigations. I ask that these provisions be struck from the plan.

"Controlled Take" is defined in the plan as "responsive hunting and trapping when required for management purposes..." The Department is contemplating allowing public and private hunters and trappers to assist ODFW in its management response actions. This is an appalling idea that would result in, at best, baseless killing of wolves. It could also result in bad actors intentionally killing wolves that pose no threat. Additionally, the plan does not take into consideration how to hold members of the public accountable should they exploit their authority. As you know, specially trained ODFW wildlife management personnel have mistakenly killed wolves. To allow the untrained public to take part in management actions is irresponsible.

As you know, in 2010 ODFW ended USDA Wildlife Services' involvement in investigating and confirming livestock depredations. ODFW rightly concluded that Wildlife Services has a track record of indiscriminately killing wildlife, especially wolves. Additionally, their methods and use of poisons and other lethal devices has caused the death of hundreds of non-targeted animals such as dogs. In 2017, a Pocatello, Idaho teenager was playing with his dog merely hundreds of yards away from his house when his dog activated a M44 lethal predator control device placed by Wildlife Services. His dog suffered a cruel and painful death, and the boy was nearly killed, saved only by the direction of the wind.

Throughout my entire career I have worked to shed light and defund this rogue, irresponsible agency. It would be detrimental to wildlife, and the reputation of ODFW, if allowed to once again take part in depredation investigations.

PLEASE RESPOND TO:

- 2134 RAYBURN HOUSE OFFICE BUILDING  
WASHINGTON, DC 20515-3704  
(202) 226-6418
- 405 EAST 8TH AVENUE, #2030  
EUGENE, OR 97401  
(541) 465-6732  
1-800-944-9603
- 125 CENTRAL AVENUE, #350  
COOS BAY, OR 97420  
(541) 289-2809
- 612 SE JACKSON STREET, #9  
ROSEBURG, OR 97470  
(541) 440-3523
- defazio.house.gov

Finally, I want to echo Governor Brown's opposition and reiterate my own strong opposition to any endorsement by the Oregon Department of Fish and Wildlife of the U.S. Fish and Wildlife Service's misguided proposal to delist gray wolves across the 48 states.

Thank you.

A handwritten signature in black ink, appearing to read "Peter A. DeFazio". The signature is written in a cursive, flowing style with some loops and flourishes.

Peter A. DeFazio  
Member of Congress

**Roxann B Borisch**

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**From:** Scott Fernandez <scottfernandez.pdx@gmail.com>  
**Sent:** Friday, June 7, 2019 6:40 AM  
**To:** ODFW Commission; Scott Fernandez  
**Subject:** Oregon Dept. Fish and Wildlife Commission- Wolf summaries to retain Endangered Species Act

June 7, 2019

Oregon Department Fish and Wildlife

## **Oregon Wolves - Retaining the Endangered Species Act**

“After more than 3 years of contentious debate, the plan that governs how Oregon manages its wolf population will finally come to a vote on Friday.

The Oregon Fish and Wildlife Commission is expected to vote on updates to the Oregon Wolf Plan, a 160-page document that spells out everything from when the state can kill wolves that attack livestock to whether public hunts of wolves should be considered in the future.”

60%- 70% of Oregon voters or more want wolves in the wilderness or other areas without being shot under Endangered Species Act.

Oregon Fish and Wild Commission life completely missed the July 15 directive from Dept of Interior, and are now trying to remove the 5 weeks of Oregon citizen comments we were given. OFWC tried to eliminate the citizen’s ability to write and speak in July.

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- USDA-Unintended Cattle Loses to Agriculture  
Cattle health problems ~ 75%      Wolves ~ 0.2% not an issue

- Neospora caninum- a parasite found primarily in cows and farm dogs. Wolves are not the problem

- Chronic Wasting Disease- chronic wasting disease among elk, deer and moose. “Wolves are the perfect animal to help reduce the spread of chronic wasting disease.” Montana Fish and Wildlife Commissioner Gary Wolfe, “I would have to agree that wolves can be effective control” Wolfe said. “They are the best natural defense Montana has.”

Oregon -72,500 elk east of US 97

150 deer and elk per day, that can carry CWD without confirming in more deer and elk.

- Northwest activities- doing helicopter wolf shooting, and wolves shot in dens from salt blocks used for cattle.

Sincerely,

Scott Fernandez

## Roxann B Borisch

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**From:** Clair <klockclair@yahoo.com>  
**Sent:** Friday, June 7, 2019 10:05 AM  
**To:** odfw.commission@state.or.us  
**Subject:** Wolf delisting

Hello Commissioners,

As a biologist I support the wolf delisting as a ESA species. The Oregon Wolf plan will both adequately control and protect this apex predator. A predator that belong in the landscape. Control of problem animals can be handled the same as other problem species – cougar, bear, elk, deer.

Thank you for your consideration,

Clair Klock

Corbett, OR

Sent from [Mail](#) for Windows 10

**Roxann B Borisch**

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**From:** Greg Costello <greg@wildlandsnetwork.org>  
**Sent:** Friday, June 7, 2019 1:20 PM  
**To:** odfw.commission@state.or.us  
**Cc:** Michelle.N.Dennehy@state.or.us  
**Subject:** Wildlands Network Comments on Oregon Wolf Plan  
**Attachments:** Wildlands Network OR Wolf Plan Comments 6.7.19.pdf

Hello,

Attached find comments submitted by Wildlands Network, regarding the Oregon State Wolf Management Plan.

Thank you,

Greg Costello  
Executive Director

Comments by Wildlands Network on the Oregon Wolf Management Plan.

Date: June 7, 2019

Sent to [odfw.commission@state.or.us](mailto:odfw.commission@state.or.us)

cc: [Michelle.N.Dennehy@state.or.us](mailto:Michelle.N.Dennehy@state.or.us)

Dear Commissioners.

Wildlands Network is a national conservation organization based in Seattle whose mission is to reconnect, restore and rewild North America so that the diversity of life can thrive. We envision a world where nature is unbroken, and where humans co-exist in harmony with the land and its wild inhabitants.<sup>1</sup>

We endorse the Plan's goal "to ensure the conservation of gray wolves as required by Oregon law while protecting social and economic interests of all Oregonians,"<sup>2</sup> but we urge OFWS to adhere to their obligation to protect wildlife and the obligation Oregon has regarding conforming to federal laws.<sup>3</sup> In Oregon west of US Highways 395 and 95, and State Highway 78, wolves are still protected under the Endangered Species Act and must be managed in a manner consistent with that law.

While we consider the OFWS Commission's decision to approve delisting wolves from the list of Oregon Endangered Species<sup>4</sup> premature and not based on the best available science, we endorse the management objectives to "continue to promote a naturally reproducing population of wolves, allowing for continued expansion into other areas of the state."<sup>5</sup>

### ***Wolves Require Continued Protection as an Endangered Species***

Granted, over the past four decades, U.S. agencies, NGOs, and concerned citizens have made reasonable progress toward the recovery of wolves. Today, approximately 5500 wolves inhabit approximately 15% of their historic range within the conterminous United States.<sup>6</sup>

Unfortunately, wolves are still functionally extinct across the vast majority of their former range including the Pacific Northwest. These essential keystone carnivores cannot be considered fully recovered until they are found in ecologically functional populations in significantly more wild lands across the country. The 2011 delisting in several states, motivated by local and special interests, provides a vivid, disconcerting warning.

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<sup>1</sup> <https://wildlandsnetwork.org/our-vision/>.

<sup>2</sup> ODFW 2019:ii.

<sup>3</sup> Nie et al. 2017:95; Greaves 2009:919,931.

<sup>4</sup> ODFW 2019:8.

<sup>5</sup> ODFW 2019:8.

<sup>6</sup> Concerned Scientists 2019.

For example, between April 2011—the year elimination of ESA protection from five states began—and April 2016, more than 4,200 wolves were killed in six states.<sup>7</sup> In Idaho, Montana, and Wyoming alone, trophy hunters, trappers, and others killed *over 3,500 wolves*. Before delisting, Idaho had the largest wolf population in the Rockies, at approximately 1,000 animals. While Idaho now has approximately 770 wolves, it also has the dubious distinction as leader of wolf slaughter of all the states in the lower 48. Montana hunters and trappers killed 1,036 wolves during the same period.<sup>8</sup>

While there were no known wolves in Oregon at the time, wolves were listed as endangered under the Oregon ESA in 2005 when the state’s wildlife commission adopted the first wolf management plan.<sup>9</sup> In 2008, the post-extirpation reproduction by Oregon wolves was discovered in the Wenaha Wildlife Management Unit (WMU) in northeastern Oregon. By the end of 2011, the wolf population had grown to 29 known wolves, including four packs and one breeding pair.<sup>10</sup>

In 2011—when the USFWS delisted the gray wolf from the federal ESA east of Oregon Highways 395, 78, and 95 as part of the larger Northern Rocky Mountain Distinct Population Segment—wolves west of this boundary remained federally protected as endangered although wolves in the state’s eastern one-third lost federal protection.<sup>11</sup> To make matters worse, Oregon wolves are no longer protected as a *state* endangered species.<sup>12</sup> The state fish and wildlife commission initiated a biological status review to determine if the species required continued listing under the Oregon ESA. That review led to the controversial delisting of wolves in Oregon in November 2015.<sup>13</sup>

*That decision was contested by conservationists concerned that wolves were not recovered and that the state ignored the best available science in making that decision.*<sup>14</sup> A species is “recovered” when it no longer fits the legal definition of an endangered species, i.e., when it is not “in danger of extinction throughout all or a significant portion of its range” and when the species is unlikely to fit the definition in the foreseeable future. Recovery requires a species to be broadly distributed throughout portions of its historic range.<sup>15</sup>

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<sup>7</sup> Idaho, Montana, Wyoming, Minnesota, Wisconsin, and Michigan.

<sup>8</sup> Predator Defense 2017.

<sup>9</sup> ODFW 2019:6.

<sup>10</sup> ODFW 2019:1.

<sup>11</sup> CBD and HSUS 2018:22.

<sup>12</sup> CBD and HSUS 2018:22.

<sup>13</sup> ODFW 2019:iii. See also *Wolves Removed From Oregon Endangered Species List*. David Smith. November 11, 2015. *WideOpenSpaces*. <https://www.wideopenspaces.com/wolves-removed-oregon-endangered-species-list/>

<sup>14</sup> *Conservationists Challenge Oregon’s Wolf Delisting FAQ*. Oregon Wild <https://oregonwild.org/conservationists-challenge-oregons-wolf-delisting-faq>.

<sup>15</sup> Vucetich et al. 2006, Tadano 2007, Enzler & Bruskotter 2009, Greenwald 2009, Kamel 2010, Carroll et al. 2010, and Bruskotter et al. 2014, and Nelson et al. 2016.

We appreciate Governor Kate Brown's recent decision generally supporting continued ESA listing for wolves currently protected under the under that federal law, but we consider problematic her proposal to exempt Oregon and remove federal protection of wolves within Oregon's western two-thirds.<sup>16</sup> Both decisions should be based on the best available scientific information. *Under this standard, they fail.* As an example, early in May this year more than 100 scientists sent a letter to Interior Secretary David Bernhardt objecting to the proposal to remove Endangered Species Act protections for gray wolves across nearly all of the lower 48 states, including Oregon.<sup>17</sup> "The best available science clearly shows that wolves are not ready to be delisted because the Endangered Species Act requires a species to be recovered throughout a larger portion of its historic range, and this has not been achieved yet," according to Dr. John Vucetich of Michigan Tech School of Forest Resources and Environmental Science. "Issues that arise in recovering wolves, such as concern over conflicts between wolves and livestock, are all quite manageable and wolves shouldn't be delisted because it is a politically expedient solution to these conflicts."<sup>18</sup> *Delisting wolves in Oregon at this time does not conform to the "best available science" standard.*

As a result of the state delisting in 2015, state agents kill wolves nearly every year for livestock predation control under the state's inadequate management plan.<sup>19</sup> Consequently, the recolonization of wolves in western Oregon has been slow and the killing of wolves in the federally delisted portion must be considered a threat as it hinders the ability of wolves to disperse and repopulate unoccupied areas.<sup>20</sup> Oregon also has experienced high levels of illegal wolf killing in recent years, particularly in southwestern Oregon as dispersing wolves have tried to reach suitable habitat in the region.<sup>21</sup>

### *Wildlife Connectivity*

Wildlife do not distinguish political or land ownership boundaries. One of the most effective strategies to abate the threats posed by any changes to habitat is conservation planning and implementation that protects crucial habitats and maintains the ecological permeability of the intervening landscape allowing wildlife

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<sup>16</sup> Letter to Secretary on Interior from Oregon Governor clarifying the State's position on the proposed national wolf delisting. May 15, 2019.

<https://www.documentcloud.org/documents/6007031-05-15-19-Secty-Bernhardt-Wolf-Clarification.html>. See also Governor Kate Brown Thinks Wolves Need Endangered Species Protection, But Not In Oregon. Tony Schick. May 17, 2019. *OPD*.

<https://www.opb.org/news/article/gray-wolves-federal-protection-oregon-brown/>

<sup>17</sup> Concerned Scientists 2019.

<sup>18</sup> More than 100 Scientists Oppose Removing Federal Protections for Grey Wolves. May 7, 2019. <https://biologicaldiversity.org/w/news/press-releases/100-scientists-oppose-removing-gray-wolf-protections-2019-05-07/>.

<sup>19</sup> Oregon Dept. Fish and Wildlife 2010.

<sup>20</sup> CBD and HSUS 2018:22.

<sup>21</sup> CBD and HSUS 2018:22.

to move between those areas.<sup>22</sup> Conservation planning and action must emphasize regional- and continental-scale connectivity, strongly interactive species, and ecological processes such as dispersal of apex predators such as wolves.<sup>23</sup> Conservation of wildlife corridors and crucial habitat must be coordinated across federal, state, tribal, state, and where possible, private land entities.<sup>24</sup> Connectivity is simple, cost-effective, and even culturally popular, particularly if fish and game species benefit where dispersal and migration are facilitated by the mitigation or removal or mitigation of obstacles such as roads, sprawl, etc.<sup>25</sup>

At least three credible wildlife connectivity models depict viable wildlife movement pathways from Idaho, through the Hells Canyon/Eagle Cap ecoregion, several linkages across Oregon to the Cascade Range, and south into the Klamath Siskiyou region of California.<sup>26</sup> And as of today, the Oregon Department of Fish and Wildlife and Oregon Department of Transportation have an affirmative obligation to plan for wildlife connectivity state-wide under House Bill 2834, which Governor Brown is expected to sign into law today.

In addition to state requirements, other ongoing opportunities to implement connectivity requirements through relevant land management planning include National Forest Plan revisions and plan amendments. The Umatilla, Malheur, and Wallowa-Whitman Forest Plan revisions, for example, are currently on hold pending resolution of objections raised regarding finalization of the three forest plans.<sup>27</sup>

Wolves are known to move into new suitable habitat, Indeed Oregon wolf OR-7's well documented travels through Oregon and eventually to Northern California, where it found a mate and established the first California wolf pack since its extirpation illustrate the need to protect both wolves and their habitat in order for wolves to reclaim a larger portion of their historic range. While by 2018, Oregon's wolf population increased to a total known population of 137<sup>28</sup> the vast majority of the state's known wolves, and all but two of its packs, remain clustered in NE Oregon. In Western Oregon, where wolves are currently still protected by the federal Endangered Species Act, the known wolf population increased by only one. Maintaining protections for wolves is essential to protect them as they move beyond occupied habitat into other suitable habitat, as exemplified by OR-7.

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<sup>22</sup> WGA 2009.

<sup>23</sup> Soulé 2010:351.

<sup>24</sup> WGA 2009.

<sup>25</sup> Soulé 2010:351.

<sup>26</sup> Belote et al. 2016; Fields et al. 2010; McGuire et al. 2016.

<sup>27</sup> USDA Forest Service Releases Final Instructions on Objections for Blue Mountains Forest Plan Revisions. March 14, 2019. <https://www.fs.usda.gov/detail/r6/news-events/?cid=FSEPRD613895>.

<sup>28</sup> ODFW 2018.

Finally, wolves are a keystone species and protecting wolves and their movement through Oregon will have the effect of protecting a wide range of other species critical to the continued level of biodiversity throughout the state.

### ***Utilize the Best Available Science***

In order to assure the public, state legislature, and the Oregon Department of Fish and Wildlife obtains the most credible scientific information available regarding carnivore management; we urge the state to ***establish an independent scientific advisory group consisting of experts in carnivore science.***<sup>29</sup> The preponderance of the group should consist of scientists who do not work for, consult with, own shares in, or receive funding from any company or organization that would benefit from the scientific advisory group's recommendations. The best available science comes from independent scientists with relevant expertise who are able to evaluate and synthesize the available science, and adhere to standards of peer-review and full conflict-of-interest disclosure.<sup>30</sup>

### ***Wolves are Essential for Long-term Ecologic Integrity***

Recent research has shown the wolf to be a “strongly interactive species,” meaning its interactions with other animals contribute substantially to the maintenance of habitat and biodiversity.<sup>31</sup> Maintaining ecologically functional wolf populations—populations of sufficient density and distribution—is fundamental to the health of our native ecosystems.

The plan's assertion that “[w]hile the role of wolves shaping trophic cascades have been widely reported...many of the conclusions that have been reached on the topic are equivocal”<sup>32</sup> *grossly misrepresents the state of the science with regard to large carnivore trophic cascades, and misrepresents to Oregonians the significant role large carnivores play in ecosystems.*<sup>33</sup>

The disappearance of species such as wolves leads to profound changes in ecosystem composition, structure and diversity.<sup>34</sup> Restoration requires the reestablishment of healthy wolf populations in Oregon's remaining wild ecosystems where suitable habitat persists, with each population large enough to maintain critical interactions between wolves and ecosystems.<sup>35</sup>

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<sup>29</sup> Murphy and Weiland 2016. See Concerned Scientists 2016. See also Miller et al. 1998.

<sup>30</sup> Concerned Scientists 2016.

<sup>31</sup> Soulé et al. 2003, 2005; and Terborgh and Estes 2010.

<sup>32</sup> *Oregon Wolf Conservation and Management Plan*—Section D, entitled the “Role of Wolves in Ecosystems,” pp. 3-5, particularly the 4<sup>th</sup> paragraph of that section.

<sup>33</sup> Comments submitted on June 5, 2019 to ODFG by Robert Beschta 2019 provides compelling rationale to challenge agency's position on the state of science regarding trophic cascades.

<sup>34</sup> Beschta and Ripple 2016, 2019; Beschta et al. 2016, 2018.

<sup>35</sup> Defenders of Wildlife Wolf Conservation Vision.

<http://www.endangered.org/cms/assets/uploads/2013/07/a-blueprint-for-continued-wolf-restoration.pdf>.

### ***Wolf Management***

In 2009, the Oregon Legislature changed the status of wolves from protected non-game wildlife to a special status game mammal.<sup>36</sup> The agency asserts this classification provides the most options for long-term management.<sup>37</sup> The proposed plan provides for “controlled hunts”<sup>38</sup> and trapping for lethal management control.<sup>39</sup> We maintain that such activities are inconsistent with the best available science, generally unnecessary, unpopular, and often counterproductive.

For example, researchers found corroborating evidence that lethal control of wolves did not prevent future livestock losses, and reported that any small reduction in risk for affected farms was outweighed by a subsequent greater risk for farms in neighboring townships.<sup>40</sup> They interpreted patterns of wolf and livestock death to mean that lethal control might cause spill-over effects leading to more losses of domestic animals in subsequent periods.<sup>41</sup> In any event, only a fraction of cattle and sheep growers in wolf-occupied states use non-lethal methods to protect their herds—even as numerous published scientific studies have found that non-lethal methods to protect non-native cattle and sheep from native carnivores are more efficacious and cost effective than the constant slaughter of wildlife that is ubiquitously employed—even on federally protected species.<sup>42</sup>

*Wolf populations are Self-Regulating.* With extremely rare exceptions, wolf populations do not require human intervention and certainly not culling. Their populations are generally limited by prey availability, but when prey availability is unusually high wolf populations are limited by density-dependent factors, such as disease, and pack stability and territoriality.<sup>43</sup>

Of particular concern to us, the proposed plan allows killing of wolves when “wild ungulate populations not meeting established management objectives or herd management goals and that ODFW has determined that wolves are a major cause of the population not meeting established ungulate objectives or herd management goals.”<sup>44</sup> We disagree with that assessment. Simply put, it’s extremely unlikely that wolf predation would ever significantly suppress the population of healthy adults available for hunting. Nor can an agency mimic the effects of natural mortality resulting in a “carefully managed” ungulate populations “through hunting.”<sup>45</sup> Deer

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<sup>36</sup> ORS 496.004 (9).

<sup>37</sup> ODFW 2019:31.

<sup>38</sup> Planned hunts with a specific timeframe, area boundaries and where the number of hunters is limited through a public drawing or other means) require Commission approval through the planning and hunt development public process. ODFW 2019:31.

<sup>39</sup> ODFW 2019:31

<sup>40</sup> Santiago-Ávila et al. 2018.

<sup>41</sup> Treves 2019:17.

<sup>42</sup> HSUS 2019.

<sup>43</sup> Carriappa et al. 2011; Hatton et al. 2015; Rutledge et al. 2010; and Lake et al. 2015.

<sup>44</sup> E.g., movements, use of key feeding areas, survival rates, nutrition, or other biological factors) and that the controlled take is expected to improve the situation ODFW 2019:32.

<sup>45</sup> ODFW 2019:5.

and elk populations can be controlled by hunting, but the size, age and health of animals consumed by wolves—older and more vulnerable—may show little resemblance to those killed by human hunters.<sup>46</sup> While wolves often can reduce the total number of their prey,<sup>47</sup> carnivores can also influence those animals through nonlethal, behavioral effects.<sup>48</sup> Predation risk affects the population dynamics and habitat use of prey indirectly by forcing individuals to invest in anti-predator behavior resulting in trading off reproduction or foraging efficiency.<sup>49</sup> These behavioral interactions are powerful enough to drive trophic cascades and must be considered in carnivore management planning.<sup>50</sup>

### *Hunting*

While wolves often can reduce the number of their prey<sup>51</sup>—some poorly informed hunters oppose the reintroduction of wolves for this reason<sup>52</sup>—wolves are not negatively impacting the health or vitality of any deer or elk population.<sup>53</sup> Several considerations indicate that concerns over the impact of wolves on deer and elk hunting are overstated:

- Healthy wolf populations are vital to the health of ecosystems inhabited by native ungulates.<sup>54</sup>
- Ungulates are widely acknowledged – even by scientists working for state wildlife agencies – to be overabundant in many portions of current and historic wolf range. Overabundant ungulate populations are widely understood to be of significant detriment to agriculture, forestry, private property, and human safety (deer-vehicle collisions).<sup>55</sup>
- Ungulate hunting is successful in all states where wolves live. For example, in 2015 Idaho experienced record high killing of white-tailed deer and the highest number of elk taken since 1996. The high numbers were not attributed to the state’s control of wolf predation, but instead to a series of mild winters.<sup>56</sup> Moreover, any hunters’ dissatisfaction with ungulate hunting success is likely connected less with any discernable effect of wolves and more with ill-informed perceptions of how wolves impact ungulate populations, lack of trust in state wildlife agencies, and unrealistic expectations concerning game animal levels. It would be valuable for state and federal wildlife agencies to address those likely sources of dissatisfaction.

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<sup>46</sup> Noon and Crooks 2013.

<sup>47</sup> Mech and Peterson 2003, Ripple and Beschta, 2012.

<sup>48</sup> Beschta and Ripple 2009; Ritchie and Johnson 2009; Ripple et al. 2013.

<sup>49</sup> Lima 1998; Brown et al.1999.

<sup>50</sup> Creel and Christianson 2008.

<sup>51</sup> Mech and Peterson 2003, Ripple and Beschta, 2012.

<sup>52</sup> Simon 2013.

<sup>53</sup> Concerned Scientists 2019. Appendix 5.

<sup>54</sup> Ripple et al. 2014.

<sup>55</sup> Concerned Scientists 2019. Appendix 5.

<sup>56</sup> Idaho Fish and Game 2016.

- In many places where ungulates are less abundant, poor habitat is believed to be the limiting factor, not wolf predation.<sup>57</sup>
- It is normal and healthy for ungulate populations to fluctuate in response to many factors – the most important factors being winter severity, habitat quality, and human hunting. It is a deeply unrealistic expectation to think that ungulate abundance would not fluctuate over time.<sup>58</sup>

The *2016 National Survey of Fishing, Hunting, and Wildlife-Associated Recreation* revealed that over 103 million U.S. residents 16 years and older participated in wildlife-related recreation. The study reported that during 2016, 35.8 million people fished, 11.5 million hunted, and 86.0 million participated in at least one type of wildlife-watching activity including observing, feeding, or photographing fish and other wildlife in the United States.<sup>59</sup> While the 2016 survey did not breakdown these activities on a state-by-state basis, data from the 2011 National Survey of Fishing, Hunting and Wildlife-Associated Recreation show the importance of wildlife-related recreation to Oregon’s non-hunting public. Of the 1.8 million Oregon participants in wildlife-related activities, 11% hunted and 81% enjoyed wildlife watching.<sup>60</sup> While rural residents are more likely hunt, urban residents are more likely to engage in active recreation.<sup>61</sup>

Hunting and agricultural interests dominate the majority of many state wildlife advisory groups, including Oregon’s<sup>62</sup> and all too frequently make decisions not reflecting the preferences of the estimated 95% of Oregonians who do not hunt.<sup>63</sup> Resolution of that inappropriate disconnect includes paying closer attention to public opinion, as well as a broader representation of the state’s population concerned about wildlife.

### *Similarity of Appearance Considerations*

Wolves can be difficult to distinguish from coyotes, and the coloration of individual wolves likely contributes to misidentification.<sup>64</sup> While there is only one reported Oregon case reported as mistaken identity resulting in the killing of a radio-collared wolf in Grant County in 2015, other examples emphasize the threat. For example, in December, 2014, a female wolf that had traveled at least 750 miles from the Yellowstone ecoregion to Grand Canyon National Park, was killed by a coyote hunter

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<sup>57</sup> Concerned Scientists 2019.

<sup>58</sup> Concerned Scientists 2019.

<sup>59</sup> USDI et al. 2016:4.

<sup>60</sup> USDI et al. 2011.

<sup>61</sup> McLain et al. 2017; cited in Spies et al. 2018.

<sup>62</sup> <https://www.dfw.state.or.us/agency/commission/members.asp>. See also Environmental Groups Get Big Game Hunter Spiked from Oregon Wildlife Commission. Tony Schick. May 7, 2019. *OPB*.

<https://www.opb.org/news/article/oregon-fish-wildlife-nominee-james-nash-hunter-rejected/>.

<sup>63</sup> Support Ban on Frivolous, Cruel and Wasteful Coyote Killing Contest in Oregon. John W. Laundré. March 29, 2019. *Statesman Journal*.

<sup>64</sup> ODFW 2019:22.

claiming mistaken identity.<sup>65</sup> Gray wolves had not been observed in northern Arizona for more than 70 years.<sup>66</sup>

A recent study revealed American's attitude toward historically stigmatized species, including wolves and coyotes, has significantly improved. People reported positive attitudes toward these species between 1978 and 2014 increased by 42 and 47% respectively.<sup>67</sup> Following the theory that people who hold positive attitudes towards a species are more likely to have a concern for their welfare, the authors expressed hope that more positive attitudes about these species may "foretell increased support for efforts to conserve these species, and support for policies that explicitly consider their welfare." They also note that their findings could help policy makers, and presumably advocates, gauge public support for management practices and policies. These observations conform to general trends regarding improving general concern for human rights and animal well being.<sup>68</sup> Managers, legislators, and wildlife advocates may also find ratings on individual species useful and should note that access to scientific information about animals leads to more positive views of them.<sup>69</sup>

The U.S. Endangered Species Act provides for *protecting animals that don't belong to endangered species, but which resemble endangered species, e.g., wolves, closely enough that it's hard for either law enforcement or the public at large to distinguish between them.*<sup>70</sup> Species listed under a similarity of appearance may be protected by the take prohibitions of section 9 under the ESA, where they overlap with the listed species they were listed to protect.<sup>71</sup> Examples of such animals given protection due to what the Endangered Species Act calls "similarity of appearance" includes the American alligator. The alligator has recovered enough that it's not longer in danger throughout its range, but it's still on the list of Threatened Species due to its similarity to the American crocodile, which is still Threatened in Florida and Endangered everywhere else.<sup>72</sup>

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<sup>65</sup> Bounty Hunters: A Clandestine War on Wolves. Jeremy Miller. *Harpers Magazine*. January 20, 2015. <http://harpers.org/archive/2017/01/bounty-hunters/2/>

<sup>66</sup> Animal in North Kaibab Forest Confirmed to be a Wolf. November 21, 2014. *Arizona Daily Sun*. [http://azdailysun.com/news/local/animal-in-n-kaibab-forest-confirmed-to-be-wolf/article\\_913477dc-acd3-551a-b028-d9da24f2af8a.html](http://azdailysun.com/news/local/animal-in-n-kaibab-forest-confirmed-to-be-wolf/article_913477dc-acd3-551a-b028-d9da24f2af8a.html).

<sup>67</sup> Kelly et al. 2016.

<sup>68</sup> Pinker 2011; 2018.

<sup>69</sup> Attitudes Toward Animals Over the Past Three Decades. November 24, 2016. *Faunalytics*. <https://faunalytics.org/americans-concern-animals-rises-across-board/>.

<sup>70</sup> "Is it Time to End Coyote Hunting in California?" Clarke, Chris. KCET Los Angeles Commentary. January 5, 2015. <http://www.kcet.org/news/define/rewild/commentary/is-it-time-to-end-coyote-hunting-in-california.html>

<sup>71</sup> Section 4 (a)(8)(e). Species listed under a similarity of appearance are not biologically endangered and are not subject to section 7 consultation. Listing by similarity of appearance depends on the degree of difficulty law enforcement personnel would have in distinguishing the species from an endangered species and where the additional threat posed to the endangered species by the similarity of appearance.

<sup>72</sup> Clark 2015.

While coyotes are not legally “threatened,” people hunting them for sport pose a threat to wolves struggling to recover. To the agency’s credit, ODFW committed to implement additional education and training through existing program avenues – hunter education, website information, and media contacts to lessen the chance of misidentification and accidental hunter take.<sup>73</sup>

More effort is required, however. Coyotes are classified as predatory animals in Oregon and the Plan does not prescribe limitations on the killing of coyotes.<sup>74</sup> Nevertheless, gratuitous killing—for fun, trophy, or bragging rights—of these animals is controversial nationwide, and especially in Oregon.<sup>75</sup> While we urge a ban of coyote hunting in occupied wolf habitat, consideration of these animals’ well being, as well as consideration of public concerns, needs to become an ODFW priority. Indeed, just this week the Oregon State Senate passed a bill outlawing coyote killing contests, and the bill now goes to the House of Representatives. If passed and signed into law it is a clear reflection of the citizens of Oregon’s strong preference for more protection, not less, of carnivores.

### **What is Needed**

In addition to continued protection under the ESA, we reiterate the necessity to promote wolf recovery in Oregon by developing a robust state plan for wolf conservation and recovery; one that does not permit recreational hunting or trapping of any kind and that modifies the lethal take provisions to conform with best available science.<sup>76</sup>

The biodiversity of ecosystems degrade unless the interactions of species are maintained in as many regions as feasible.<sup>77</sup> This more holistic, contemporary view requires that strongly interactive species receive special attention to assure that they are well distributed and abundant in suitable habitat, a position consistent with an opinion of the U.S. Ninth Circuit Court of Appeals.<sup>78</sup> Such a geographic criterion

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<sup>73</sup> ODFW 2019:22.

<sup>74</sup> ORS 610.002. See ODFW 2019:22.

<sup>75</sup> Support Ban on Frivolous, Cruel and Wasteful Coyote Killing Contest in Oregon. John W. Laundré. March 29, 2019. *Statesman Journal*.

<https://www.statesmanjournal.com/story/opinion/2019/03/29/end-cruel-wasteful-coyote-killing-contests-oregon-legislature-sb-732/3260183002/>. See also Should Oregon Outlaw Coyote Hunting Tournaments and Similar Events? Mark Furman. January 30, 2019. KVAL. <https://kval.com/news/local/should-oregon-outlaw-coyote-hunting-tournaments-and-similar-events>.

<sup>76</sup> Concerned Scientists 2019. See also Center for Biological Diversity and the Humane Society of the United States [CBD and HSUS]. 2018. Petition to Maintain Protections for Gray Wolves (*Canis lupus*) in the Lower 48 States as Endangered or Threatened “Distinct Population Segments” Under the Endangered Species Act. December 17, 2018.

[https://www.biologicaldiversity.org/campaigns/gray\\_wolves/pdfs/Wolf-Petition-12-17-2018.pdf](https://www.biologicaldiversity.org/campaigns/gray_wolves/pdfs/Wolf-Petition-12-17-2018.pdf).

<sup>77</sup> Soulé et al. 2005:174.

<sup>78</sup> *Defenders of Wildlife v. Norton*, 258 F.3d 1136 (2001).

for recovery requires more than scattered or refugial representation of native species as the proposed delisting will incur.

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**Roxann B Borisch**

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**From:** Paula Hood <paula.e.hood@gmail.com>  
**Sent:** Friday, June 7, 2019 4:18 PM  
**To:** odfw.commission@state.or.us  
**Subject:** BMBP's comments on the Wolf Management Plan  
**Attachments:** BMBP wolf comments 6\_7\_2019.pdf

Dear ODFW,

Please see attached Blue Mountains Biodiversity Project's comments on the Wolf Management Plan.

Sincerely,  
Paula Hood

Paula Hood, Co-Director  
Blue Mountains Biodiversity Project, League of Wilderness Defenders  
510 715 6238  
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Blue Mountains Biodiversity Project  
27830 Williams Lane  
Fossil, Oregon 97830

June 7<sup>th</sup>, 2019

Oregon Department of Fish & Wildlife Commission  
4034 Fairview Industrial Drive SE  
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Dear Commissioners,

Blue Mountains Biodiversity Project is based in Fossil, Oregon. Our mission is to protect and restore the natural ecosystems of the Blue Mountains and Eastern Oregon Cascades. 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. 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. 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.

Wolves in Oregon and across their range should be protected under the Endangered Species Act (ESA), and have the strongest possible protections under the Oregon Wolf Management Plan. Wolves need and deserve these protections, and state agencies have a legal and social responsibility to ensure the recovery and protection of endangered species. 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 are concerned that in light of ongoing threats from parvovirus, poaching, and other sources of mortality, Oregon's small wolf population continues to be in jeopardy of extinction. Wolves are still too limited in numbers and in distribution for sustained populations or ecological recovery to occur. Increased habitat fragmentation, climate instability, and expanding human settlements in the urban-wildland interface areas further compound possible wolf recovery. The gutting of wolf protections in neighboring states, combined with possible weakened protections in Oregon, will not ensure sufficient genetic diversity and connectivity. Weakened protections for wolves would also threaten the establishment and viability of wolves across significant portions of their range within Oregon. We are also very concerned that poaching will continue, and poses a very real threat to wolf recovery. If protections for wolves are decreased through upcoming decisions regarding the wolf management plan, then programs and regulations will not be adequate to protect our still recovering wolf population.

***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, nor does it increase social acceptance of wolves. 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.

***The public favors wolf recovery.*** The public wants wolves and supports strong legal protections on endangered species, including wolves. Public polls consistently show that the majority of Oregonians 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. 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.

***Non-lethal works!*** Wolf recovery and protection does not mean that ranchers will be solely shouldering financial burdens incurred from living with wolves. Funds remain available for compensation for non-lethal controls and depredations in western and Midwestern states. 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.

***Killing wolves harms pack structure, and may exacerbate livestock-wolf conflicts.*** Destroying pack structure by killing wolves may cause young, inexperienced or immigrating wolves to be more likely to prey on livestock. In situations in which killing wolves in response to depredations

has been emphasized, depredations have gone up, as shown by the 2014 Wielgus study concluding that killing wolves in response to livestock depredations actually causes more depredations. In addition, the pack may dissolve, or reproduction can be negatively affected-potentially jeopardizing recovery in a population with very few breeding pairs. Blue Mountains Biodiversity Project is opposed to killing wolves, i.e., “lethal control”, especially on public lands. We are opposed to any hunting or trapping of wolves in Oregon.

***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. Such considerations are very important when considering how best to preserve biodiversity and protect ecosystem integrity in the face of climate change.

***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.

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

Thank you for considering Blue Mountains Biodiversity Project’s comments.

Sincerely,



Paula Hood  
Co-Director, Blue Mountains Biodiversity Project

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