



November 6, 2015

Oregon Dept. of Fish & Wildlife
ATTN: ODFW Commissioners
4034 Fairview Industrial Drive SE
Salem, OR 97302

SUBJECT: ODFW WOLF DELISTING PROPOSAL

Dear ODFW Commissioners,

Please accept these comments on proposed wolf delisting on behalf of myself and Predator Defense.

Having carefully reviewed the science, the public sentiment, and the facts on the ground, we do not support delisting of wolves from Oregon’s Endangered Species List at this time. Instead, we support the ODFW proposal’s “no action alternative”—leaving wolves on the state endangered species list for at least another five years to give wolves more time to occupy their historic habitat in Oregon. We also find that, under current management prescriptions, ODFW has enough flexibility to deal with any livestock conflicts, and there is no evidence that wolves are causing any decline in prey numbers across their range. Thus, there is no reason to delist.

Here is why we have come to this conclusion.

According to Table 2 in your delisting proposal, Oregon has a minimum of 85 known wolves. While there are an estimated 13 breeding pairs of wolves in the state, we feel this is still a relatively low number to base delisting upon. Not only could non-random stochastic events drop the wolf population considerably, but using the likelihood of extinction as the measure of whether delisting is suitable at this time, does not make sense to us.

We agree with ODFW that wolves are not likely to go extinct in Oregon, and as the state suggests, even if this were to occur, wolf recolonization from adjacent states like Idaho is likely. But this does not necessarily mean protection for wolves should be eliminated.

We disagree with the definition of “conservation failure” used by the department. By ODFW definition failure is the near extinction of wolves in Oregon (five or less wolves). We do not believe this should be a basis for analysis. Rather in our view, a conservation failure would be any reversal in wolf population, and failure to achieve widespread distribution across the state in suitable habitat. By such a measure, the current population, and even population projections are far below what is necessary to ensure a conservation success.

Would ODFW call restoration of 100 elk across the entire state of Oregon a “conservation success?” Hardly. If we were discussing elk, the department would want to ensure that elk were found throughout its historic range and in much greater numbers than currently accepted for wolves—even acknowledging that wolves will always exist at lower densities than elk.

According to ODFW statistics as well as the experience in other states, human-caused mortality is the biggest factor in wolf population decreases. In Oregon, even with protection, some 85% of all known mortalities are due to humans.

In addition, due to the low population numbers, random events like disease could significantly set back wolf recovery in the state. For instance, on Isle Royal in Michigan, wolf numbers declined from a high of over 50 to 3 animals due to disease and interbreeding depression effects.³

While the likelihood that Oregon's wolves would see such a precipitous decline in numbers is remote, it is not beyond imagination to think you might see the population cut in half in a relatively short time. In Yellowstone wolves went from 150 to around 75 animals in a matter of a few years. In both cases, we are talking about wolves that live in protected National Park sanctuaries—which is not the case in Oregon. The safest way to ensure this does not happen is to permit the wolf population to grow significantly.

Back in 1990s I published a paper on the potential for wolf recovery in Oregon whereby I estimated the state could sustain 2,000 plus animals.¹ Tad Larson, using GIS methods, came to a similar conclusion.²

Under most definitions of wildlife recovery, the goal ought to be to reestablish and sustain an endangered species over a "significant" portion of its range. Yet much of Oregon remains wolf-less. Currently ODFW estimates that wolves occur in 31.6% of the available habitat in eastern Oregon and only slightly more than 2.7% of the habitat in western Oregon. Most wolf pack activity is concentrated in the northeast corner of the state, with a few packs in the southern Cascades near Klamath Falls. Given these studies, and in the absence of any other studies by ODFW, it would suggest that Oregon could easily sustain significantly more wolves.

We wish to note that ODFW notes that elk are the preferred prey of wolves in Oregon and that "between 2009 and 2014, all Wildlife Management Units (WMU's) of northeastern Oregon with established wolf packs for at least four years (Imnaha, Snake River, Walla Walla, Wenaha) had increasing elk populations, and two of the four (Imnaha and Snake River) were above the established management objectives for elk since wolves became established (ODFW data)."

This suggests that wolves are actually favorably impacting elk numbers. A similar situation exists in Montana where elk numbers grew from an estimated 89,000 animals in 1992 (Montana Elk Plan) to 167,000 elk today (2015). Though a correlation, this suggests that the presence of wolves tends to improve elk hunting opportunities.

Nevertheless, we are concerned that if wolves are delisted that ODFW will authorize hunting and trapping of animals to increase populations of elk and deer or merely to appease hunters/ranchers. According to the document this could occur as early as 2017. Giving priority to elk and deer that hunters seek is an abrogation of the department's public trust to manage wildlife for all of Oregon's citizens.

ODFW is obligated to manage wildlife "to prevent serious depletion of any indigenous species and to provide the optimum recreational and aesthetic benefits for present and future generations of the citizens of this state." **The 2009 change in status of the wolf "special status game mammal" greatly concerns us, as there is no biological reason to kill wolves.** And it is our contention that most wolf killing that does occur in western states is of a vindictive nature, especially since wolves are not consumed for food.

We are worried that ODFW will emphasize the "recreational benefits" as defined as maximizing hunter opportunities for hunting game animals at the expense of aesthetic benefits for present and future generations. The fact that ODFW has and continues to do this with other predator species like cougar is one indication of the department's bias against predators.

Furthermore, the assumption that having a hunting season will increase public acceptance of wolves is not borne out by research. In Wisconsin support for wolf recovery declined after a hunting season was initiated.⁴

As Treves et al⁵ have argued, state wildlife agencies have a public trust to manage predators for all citizens, not just primarily the interests of hunters and ranchers, which appears to be the main constituency ODFW is attempting to placate. They state that most Fish and Game agencies portray predators as a liability instead of an asset, which is counter to their responsibilities to the public trust. **Certainly the general tenor of the ODFW delisting review contains language that suggests that there could be “too many wolves.” Very little space in the document articulates the many values of predators to ecosystem health and overall public support for predators.**

ODFW concludes that “a delisting decision by the Commission is not expected to affect the management of wolves within the eastern WMZ.” So that raises the question:

Why prematurely delist at all? Why not wait another five years and then reevaluate? If predictions in ODFW’s wolf document are accurate, there will be a larger population, and more robust changes for the wolf to occupy more of Oregon at that time. Why the rush to delist?

Sincerely,



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References:

¹ Wuerthner, G. 1996. Potential for wolf recovery in Oregon. in N. Fascione, and M. Cecil, editor. Defenders of Wildlife's Wolves of America Conference

² Modeling Gray Wolf Habitat in Oregon Using a Geographic Information System

³ <http://www.freep.com/story/news/local/michigan/2015/04/17/isle-royale-wolf-wolves-population-decline-moose-superior/25950511/>

⁴ Public Attitudes towards Wolves in Wisconsin: 2013 Survey Report Hogberg, J., Treves., A., Shaw, B., Naughton, L. Public Attitudes towards Wolves in Wisconsin: 2013 Survey Report. Carnivore Coexistence Lab. Madison, WI. October 2013. <http://faculty.nelson.wisc.edu/treves/wolves/wolfhuman.php>

⁵ Treves et al *Biological Reviews* 2015