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October 30, 2015

RE: Consideration to delist the Gray Wolf from Oregon Endangered Species Protection

Dear ODFW Commissioners,

Thank you for taking the time to consider our following comments. Bark's mission is to bring about a transformation of public lands on and around Mt. Hood National Forest into a place where natural processes prevail, where wildlife thrives and where local communities have a social, cultural, and economic investment in its restoration and preservation. Bark has over 25,000 supporters who value sensible, conservation-oriented, science-based stewardship of public lands and the wildlife that inhabit them. We submit these comments on behalf of our supporters.

Bark objects to the state Fish and Wildlife Commission's recommendation (Oct. 29, 2015) to revoke protections for Gray Wolves under the Oregon Endangered Species Act. This would demonstrate a predilection on the part of ODFW to dictate management that is unsubstantiated by the scientific community, conservation advocates, or public pressure. We request that ODFW 1.) Delay the ruling on delisting until a proper peer review of the Updated Biological Status Review of the Gray Wolf is complete and a response to such a review has been published publicly. 2.) Reevaluate the findings of the Status Review to assess in detail the implications of the upcoming revisions to the Wolf Conservation Management Plan. 3.) Define and make public long-term population goals (individual and breeding pair) by management zone. 4.) Reevaluate the findings of the Status Review to assess in detail the implications of pending forest management plan revisions (NW Forest Plan and individual National Forest Management Plans) on potential range and suitable habitat. 5.) Reevaluate the findings of the Status review to assess in detail the long-term implications of increased human populations both in terms of direct physical interactions and in terms of increased utilization of forested areas for drinking water, recreation, and infrastructure.

Objections to ODFW findings on Criteria 1:

This criteria addresses the potential risk of extinction throughout the species range. Wolves are absent from 87.6% of their potential range state-wide, occupying only 3% of their range in the Western Management Zone (WMZ). It is not logically possible for this criteria to be satisfied.

ODFW's claims that Criteria 1 is met are based on future events, not current realities. The assertions: that wolves will "eventually become established in the WMZ", that there are no known conditions to prevent wolves from expanding throughout their range, and that previous dispersal shows that individual wolves from eastern Oregon have so far made it to the western part of the state; all depend on the survival of the population in the EMZ. Delisting wolves in the Eastern Management Zone would threaten the heart of the population, exposing them to greater human caused mortality in the region where that threat is the strongest.

The OESA delisting coincides with implementing Phase III of the Wolf Management Plan. This phase of management allows for active population control - yet clear population goals are not defined by region, state-wide, or based on population density, hence the implications on population of Phase III management are not understood, nor made public. Going forward with delisting and thereby triggering Phase III in a public rule-making process without clear, scientifically sound population goals is irresponsible.

There is little evidence to suggest that the original conservation goal (meant to bring the population above the threat of extinction) of only 4 breeding pairs for 3 consecutive years is a viable standard for species recovery. The minimum conservation goals that Criteria 1 is based on are scientifically indefensible.

Objections to findings on Criteria 2:

This criteria was found to be satisfied using a population viability analysis to assess the risk of population failure in Oregon. ODFW finds that the species' natural reproductive potential is not in danger of failure. This criteria, like all the others, is based on a conservation objective of four breeding pairs over three consecutive years, an inadequate minimum conservation goal that reveals the agency's directive is not full recovery of the species to their natural presence in the landscape but to achieve a minimum as required by self-set regulations and maintain the authority to manage the population according to human tolerance largely dictated by political motives.

-None of the models, simulations, or assessments of this criteria have been subjected to a lawfully required peer-review.

Objections to findings on Criteria 3:

ODFW finds that "Wolves are expanding in their range in Oregon and therefore cannot be undergoing active deterioration of range". This finding is particularly problematic because it asserts that because Oregon wolves are dispersing into their potential range, the availability of suitable habitat is somehow guaranteed. That wolves will expand their territory does not imply that there is no deterioration to range and habitat occurring. Circular logic does not imply truth.

ODFW asserts that there is a "strong relationship between persistence of wolf populations and forested cover," and that a large portion of Oregon's public land is managed as forested habitat. Asserting this as evidence that range and primary habitat is abundantly available is myopic and unjustified. In fact, 60% of Oregon's

forested lands are National Forests, managed by the Department of Agriculture with commercial timber taking priority, not habitat conservation. State and private forests (the other 40% of Oregon's forests) are often treated with pesticides, have weaker logging restrictions, and are not subject to the protections for water and wildlife laid out in the Northwest Forest Plan. It is incredibly misleading to assert to the public that because there are forests, these forests are by definition suitable, safe, and abundant.

ODFW claims that they "are not aware of any planned or imminent changes in laws or policies affecting Oregon's forest management on a broad scale." Right now Bark and many other environmental groups are engaging with management plan revisions to the Northwest Forest Plan (and all National Forests in the country are revising individual management plans as well) which will have certainly have significant impacts on forests throughout OR, WA, and CA. Yet, ODFW claims they do not know this is happening. There are two bills (HR 2647 and S 1681) currently being reviewed in the federal Congress that would direct the Dept. of Agriculture to specifically mandate increased logging on National Forests across the country. Yet, ODFW boldly asserts no such changes are imminent.

Objections to findings on Criteria 4:

ODFW recognizes that the human population of Oregon is projected to increase by about a million over the next 15 years. They assert that this new population will settle in the Willamette Valley and have little effect on the availability of wolf habitat. However, Bend in central Oregon is the fastest growing city in the state and data shows that it is Oregon's eco-tourism, outdoor recreation and rural areas that are drawing people to the state. ODFW fails to prove that the population increase will be focused in the Willamette Valley and neglects to address the fact that the population increase will undoubtedly put increased pressure on forested areas for drinking water, forest products, and increased recreation use.

Objections to Criteria 5:

This criteria cannot be met because main protections for the species are imbedded in the OESA listing. Considering the Wolf Conservation Management Plan is going into revision and the agency has a clear leaning toward lessening protections and moving toward population limits and control rather than recovery, it cannot be asserted that the remaining protections (the Wolf Conservation and Management Plan) will be adequate to ensure recovery without the OESA listing. The Status Review findings only assume that protections will be adequate. Without knowing what the revised Wolf Conservation Management Plan will require, it is irresponsible to claim the OESA listing unnecessary. Noting the Federal ESA in effect in the WMZ as adequate is unfounded, since this in no way protects the vast majority of wolves in the state.

Thank you,

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Community Organizer