

# OREGON WOLF CONSERVATION AND MANAGEMENT PLAN ANALYSIS

**The goal of conservation is to protect biodiversity.**

- Endangered species are at risk of extinction from habitat loss, hunting, disease or climate change.
- Conservation status indicates the level of risk of extinction.
- Conservation actions often included habitat preservation, habitat restoration, anti-poaching measures, and wildlife corridors to help reconnect fragmented habitats.

**Everyone depends on the health of ecosystems.**

An ecosystem is only as healthy as the sum of its parts. It consists of a community of interacting organisms (biotic) and their relationship with non-living (abiotic) factors. In order for an ecosystem to be healthy it must also be sustainable. This means that it maintains vigor (structure), organization (function), and resilience over time, despite environmental stressors. There are endless links between ecological health and human benefits ie clean water, recreational use, jobs. Bark hopes to protect Mt. Hood as a suitable habitat for wolves and to ensure healthy/plentiful ecosystems for all to benefit.

## Timberwolf Timeline

Prior to their eradication, Gray Wolves were once found throughout Oregon and the lower 48.

- **1947** The last known wolf was killed in the lower 48
- **1973** Endangered species act implemented for reintroduction of Gray Wolf
- **1999** First lone wolf in years: B-45 from the Idaho experimental pPopulation – found in Oregon
- **1999** Public poll indicated general public support for Gray Wolf reintroduction
- **2002** The Oregon Cattleman's Association petitioned ODFW in hopes to delist wolf  
The goal of wolf dispersal by ODFW is to re-establish wolf populations in MT, WY, ID
- **2003** Commission developed Wolf Conservation and Management Plan
- **2005** 3 Phase Wolf Plan was adopted
- **2007** USFWS proposes to remove NRM (in Eastern OR) Gray Wolf population from Endangered Species List
- **2009** Wolf classified as special status game animal (NRM in E. OR)
- **2011** NRM wolves delisted
- **2015** Updated biological status review of Gray Wolves in Oregon for consideration of delisting from Oregon's Endangered Species List.
- **2015** OR Wolf population reaches 85 individuals in 16 packs

## OREGON WOLF PLAN

**Goal:** “ensure the conservation of gray wolves as required by Oregon law while protecting the social and economic interests of Oregonians”

- Human tolerance is the primary limiting factor of wolf survival.
- Enforcement of illegal actions taken to harm wolves are important (SEE ARTICLE).
- The stated goal of the plan is to **engage the public**.
- Delisting: “requires public rule-making decision by **the Commission** based on scientific information and biological data.”
  
- **Phase I:** Conservation phase – reach 4 breeding pairs for 3 consecutive years in E. Oregon.
- **Phase II:** Allows for consideration of delisting wolf as Endangered Species
- **Phase III:** Delist the Gray Wolf

### COMMISSION MUST DETERMINE IF:

- 1) Species is not at risk of extinction *now* or in *foreseeable future* in any **significant portion of its range**.
- 2) Species can successfully reproduce
- 3) Most populations are not undergoing deterioration of primary habitat
- 4) Over-utilization of species or its habitat is not occurring or likely to occur
- 5) Existing state or federal programs/regulations are adequate to protect the species and its habitat

### BIOLOGICAL STATUS SAYS:

- Wolves are a healthy and growing population – increasing in abundance and range/distribution
- “Wolves still occupy a relatively small portion of the estimated potential range in OR”  
    Much of this range is available for them to occupy
- It examined each delisting criteria (see 1–5 above)
- No known barriers that prevent wolves from entering (suitable but) uninhabited areas

### OPTIONS:

1. Remove wolf from Oregon's Endangered Species List.
2. Remove wolf from Oregon's Endangered Species List in Eastern Wolf Management Only.
3. No action.

- Much of the data is provided in the report is from ODFW. The report itself **is not peer reviewed** despite the requirements of the **ENDANGERED SPECIES ACT 496.171 (3)** which states, verifiable information is “scientific information reviewed by a *Scientific Peer-Review panel of outside experts* who do not otherwise have a vested interest in the process”
- “The wolf plan defined a population objective of 4 breeding pairs of wolves for 3 consecutive years” and claim that GOAL WAS REACHED (but it appears ODFW dictated its own goal and did so arbitrarily).

### MT HOOD IS SUITABLE FOR WOLVES BECAUSE...

- Wolves occupy land where adequate prey exists and human activity is minimal
- Majority (62%) of existing den sites are on National Forest Land
- Wolves are highly susceptible to human cause mortality
- “Wolves in open habitats are likely more susceptible to ... death and illegal take”

### EXAMINING THE PLAN

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“Wolves can occupy a variety of land cover types provided adequate prey exists and human activity is minimal... GPS location data indicated wolves in Oregon primarily use forested habitat with seasonal shifts to more open habitats that reflect seasonal distributions of prey (e.g., lower elevation elk wintering areas).”

**Although wolves are habitat generalists, this implies that forests are the most valuable habitat for Oregon's wolves.**

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Criterion 1 “The species is not now (and is not likely in the foreseeable future to be) in danger of extinction in any significant portion of its range in Oregon or in danger of becoming endangered..”

For any determination of Criterion 1 above regarding the range of a species, OAR 635-100-0105 specifies three evaluation factors to be used by the Commission:

1. The total geographic area in this state used by the species for breeding, resting, or foraging and the portion thereof in which the species is or is likely within the foreseeable future to become in danger of extinction; and
2. The nature of the species' habitat, including any unique or distinctive characteristics of the habitat the species uses for breeding, resting, or foraging; and
3. The extent to which the species habitually uses the geographic area

“Within broadly defined habitat requirements described in this document, wolves are not generally known to require specific or niche habitat features within areas of use.”

**Argues that wolf can utilize a variety of habitats but as stated above, wolves prefer forested regions.**

“Assessment of the baseline historical range of wolves in Oregon is difficult because: 1) historical accounts are inconsistent and often anecdotal; and 2) human-caused effects which resulted in the wolf's extirpation pre-dated accurate surveys of the species... For this criterion, and to facilitate our analysis, we concluded that prior to European settlement; most of the land area within Oregon was historical wolf range. “

“Historical range, however, does not mean that all geographic areas of Oregon supported sustainable sub-populations of wolves or that densities were uniformly distributed across the state.

“We estimated permanent contraction of historical range of at least 60,746 km<sup>2</sup> (24%) of Oregon has occurred to date (Figure 6). “

**Endangered species means “any species which is in danger of extinction throughout all or a significant portion of it's range.” But this definition is complex because..**

The U.S. Fish and Wildlife Service and National Oceanic and Atmospheric Administration's National Marine Fisheries Service (the Services) jointly announced a policy to improve and clarify implementation of the Endangered Species Act (ESA) by providing a formal interpretation of the phrase "significant portion of its range" that appears in the ESA definitions of "endangered species" and "threatened species." This policy improves ESA implementation by providing a consistent and uniform standard for interpretation of the phrase "significant portion of its range" by the Services in making decisions to list species in need of federal protection and delist species no longer in need of federal protection. This policy clarifies that the Services can list a species if it is endangered or threatened in a "significant portion of its range," even if that species is not endangered or threatened throughout all of its range...

Under the policy, a portion of the range of a species is defined as "**significant**" if the species is **not currently endangered or threatened throughout all of its range, but the portion's contribution to the viability of the species is so important that, without the members in that portion, the species would be in danger of extinction, or likely to become so in the foreseeable future, throughout all of its range.**

([http://www.fws.gov/endangered/improving\\_ESA/SPR.html](http://www.fws.gov/endangered/improving_ESA/SPR.html))

**What do you think of this definition? Maybe it's time for an update?**

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“We used the above factors, (sans public land ownership) and estimated the potential range for wolves in Oregon to be approximately 106,853km<sup>2</sup>, or 42.6% of the total area of the state (Figure 7). “

**Carroll et al says 23% is low and 61% the potential range for wolves in Oregon.**

Carroll Et Al. “Use of Linkage Mapping and Centrality Analysis Across Habitat Gradients to Conserve Connectivity of Gray Wolf Populations in Western North America.” 2011. Society of Biological Conservation (DOI: 10.1111/j.1523-1739.2011.01753.x)

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“When evaluating the threat of extinction in Oregon’s potential and current wolf range we considered that: 1) wolves were once extirpated as a result of historical efforts to eradicate them, and now in absence of those efforts and under current management frameworks, are increasing in abundance and distribution..”

**Implies that because wolves were brought back after being extirpated we could repeat this process if Wolves populations decline or disappear in Oregon.**

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“We consider that under current and near- future regulatory and management mechanisms and regardless of state and federal listing status, total incidental, accidental, and illegal losses will increase as Oregon’s wolf population increases, however, we expect per capita losses to remain similar.

**How can we be sure? What is the benefit of assuming this?**

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“Oregon could enter into Phase III as early as 2017. In Phase III, controlled take of wolves may be permitted as a management tool if the wolf population objectives have been exceeded and other biological considerations indicate that it would not affect wolf viability in the region.”

“..our analysis shows increasing population resilience to human-caused losses as the wolf population increases to Phase III levels.”

**What is the benefit to entering Phase III? Are we obligated to rush into it?**

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“Wolves are expanding their range in Oregon and therefore cannot be undergoing active deterioration of range. “

**Are these two points mutually exclusive? Furthermore, wolves still haven't actually occupied all of their potential range and there's a long way to go before they do.**

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PG 21

“Wildlife is managed in Oregon under the Oregon Wildlife Policy (ORS 496.012) which states in part: wildlife shall be managed 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.”

**How can we know if this has been achieved? How can it be guaranteed that the plan will protect the Gray Wolf if it is delisted NOW. What will be the cost to the taxpayer if the wolf has to be relisted versus waiting until it has occupied all suitable habitats?**

**What does “optimum recreational and aesthetic benefits” mean to you?**

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“Wolves are strongly associated with forested habitats, but are generally recognized as habitat generalists. As discussed in Criterion 3 above, management of both public and private forest lands are highly regulated in Oregon. Wolves are increasing and expanding under Oregon’s current forest management policies and we have no information which indicates that current utilization of forests is negatively affecting the wolf population.”

**Consider those who benefit from NW forests from an agricultural standpoint and what it would mean if protecting the Gray wolf meant protecting these forests.**

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Phase II is currently in effect in eastern Oregon, and would be following a state delisting from ESA: protections and regulations would not change following delisting.

**What happens if these protections and regulations aren't effective?**

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Wolf plan also argues that delisting the wolf now will sit better with the public than keeping the plan.