



HOUSE OF REPRESENTATIVES

February 16, 2011

Governor John Kitzhaber
900 Court St. NE, Suite 254
Salem, OR 97301

Oregon Fish and Wildlife Commission
c/o Teri Kucera, Rules Coordinator
3406 Cherry Ave. NE
Salem, OR 97303

Dear Governor Kitzhaber & Members of the Commission:

The Oregon Department of Fish and Wildlife, with oversight from the Oregon Fish and Wildlife Commission, implements Oregon wildlife resource policy through ten species management plans. Integral to each plan's success is ensuring that its underlying logic remains current with rapidly-developing wildlife science, a goal best accomplished through the periodic review of the plan. In light of this, I am concerned the Department's proposal to repeal deadlines for the review of its management plans for non-endangered wildlife represents a threat to both the species and the state.

The consequences of eliminating the periodic review of Oregon's wildlife management plans could be harsh. Management plans based on the best-available science are the first line of defense in the fight against species extinction. Without specific deadlines to review and update the plans, those plans become outdated and that line of defense lost. Should Oregon fail to ensure viable populations of a species, the price could be the costly listing of that species under the federal Endangered Species Act. Oregon has encountered this situation in the past, and we could face it again in the future if we fail to remain prudent in our efforts.

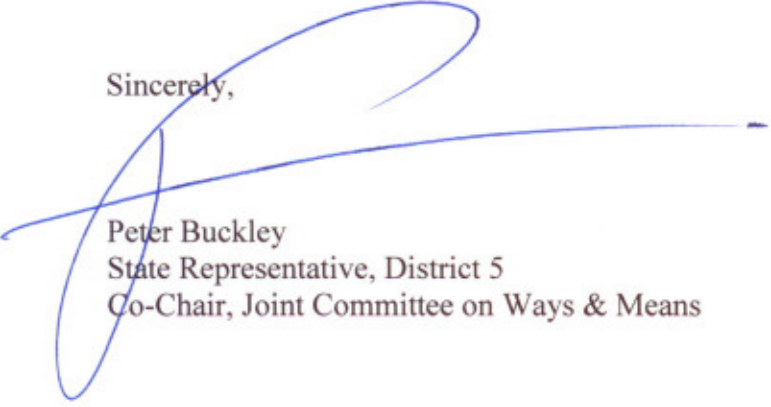
There is established precedent for specifying a timeframe for the review of management plans. A provision in the Oregon Endangered Species Act requires a mandatory review period to ensure that each species benefits from the most current research to support its road to recovery. Periodic review of science-based plans is also the norm, not the exception, in the federal regulatory arena. Both the U.S. Fish and Wildlife Service and the National Marine Fisheries Service are required to review management plans for all endangered species based on the best scientific data at least once every five years.

ODFW already has taken the time and expense to create the initial management plans. Periodically updating the plans to keep pace with new science, changing environmental conditions, and social values is simply good policy. Such a proactive approach to wildlife

management will not only ensure healthy populations of these species into the future but also avoid the high costs of failure. For these reasons, I respectfully request the Commission not eliminate mandatory deadlines for the review of its wildlife management plans.

Thank you for your consideration.

Sincerely,



Peter Buckley
State Representative, District 5
Co-Chair, Joint Committee on Ways & Means