



February 3, 2016

Chair Brad Witt
House Interim Committee on Agriculture and Natural Resources
900 Court Street NE
Salem, OR 97301

Re: Gray Wolf Delisting in Oregon

Dear Chair Witt and Members of the Committee:

The Oregon Cattlemen's Association ("OCA") is the voice of the cattle industry in Oregon. We represent over 2,000 ranchers in Oregon and aim to help grow Oregon's beef industry and promote environmentally and socially sound economic practices. Oregon has over 13,000 cattle producers, using 57% of state agricultural lands and comprising 14% of Oregon's total agricultural sector. The management of gray wolves in Oregon uniquely affects Oregon cattle producers.

We support HB 4040 and any amendments that would ratify the Oregon Fish and Wildlife Commission's ("Commission") decision to delist the gray wolf under the Oregon Endangered Species Act ("ESA"). In addition, we support legislation that recognizes ODFW's scientific findings that supported delisting. We encourage the Legislature to reinforce the Commission's decision. Ratifying the delisting of wolves is based on sound science, will maintain protections for wolves and ensure appropriate management, particularly in addressing wolf conflicts with livestock and domestic animals. Legislative action will provide certainty to beef producers and avoid costly and misplaced legal challenges.

Livestock producers around the state have complied with and accepted the guidelines set forth in the state's Wolf Conservation and Management Plan ("Wolf Plan") for over a decade. These producers carry the primary risks and costs associated with the reintroduction of wolves in Oregon, an effort that's proved successful. It is well documented that wolves prey on livestock and have done so many times since expanding into Oregon from neighboring States. OCA represents livestock producers who raise livestock in the range of gray wolves in Oregon and have been directly impacted by wolf depredations. OCA has remained committed to ensuring Wolf Plan compliance by its members and other producers in Oregon.

OCA has worked closely with the Oregon Department of Fish and Wildlife ("ODFW") over the past decade to address the issue of wolves in Oregon. In implementing the Wolf Plan in 2005 (and the subsequent addendum in 2010) the livestock industry committed to work with ODFW to strike a balance between wildlife conservation and the needs of ranchers and their family businesses. Last year, ODFW developed a solid administrative record supporting the

delisting of the gray wolf under the ESA and moving to “Phase II” of the Wolf Plan. The Fish and Wildlife Commission appropriately adopted the agency’s proposed rule in November 2015.

The Commission’s decision was well reasoned, supported by the agency’s record and based on sound scientific evidence. ODFW concluded the conservation population objective in the Wolf Plan has been achieved, and it presented scientific support for the five criteria to delisting. ODFW concluded that: 1) the gray wolf is not now, and 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; 2) the gray wolf’s natural reproductive potential is not in danger of failure; 3) most populations of gray wolf in Oregon are not undergoing imminent or active deterioration of range or habitat; 4) the gray wolf and its habitat are not over utilized for commercial, recreational, scientific or educational purposes, and overutilization is unlikely; and 5) existing state or federal programs will adequately protect the gray wolf and its habitat.

ODFW’s findings adequately demonstrate there has been a significant increase in gray wolf numbers in Oregon. According to ODFW’s 2014 population numbers, which were developed using the “minimum-observed count method,” there are at least 77 gray wolves in Oregon comprised of 9 packs, 8 of which have successful breeding pairs. ODFW’s count method likely underreports the wolf population, which means that current population numbers are higher than the 77 individuals reported in 2014. The fact that the reported population size justifies delisting the species, and the reported population “likely underestimates the actual population,” means that there is strong scientific support to delist because the gray wolf population numbers likely exceed the minimum population threshold to delist the species.

Oregon has successfully re-established wolves in Oregon and the Wolf Plan is working according to the parameters agreed to and accepted by various stakeholders. Oregon wolves are on a sustainable path and the Wolf Plan is critical to ensuring appropriate management of that population. Unfortunately, the recently filed appeal by some conservation groups has created uncertainty for producers. They face the risks of the continued growth of wolf populations and human/wolf interaction without the agreed upon and appropriate corresponding management authority given to ODFW. Further, the legal posturing undermines the credibility between stakeholders and violates trust that has been critical in maintaining compliance by all parties.

OCA is committed to working with its members to follow the Wolf Plan and find ways to balance the needs of ranchers and their families with the conservation goals of the Wolf Plan. It is appropriate for both the executive and legislative branch to reinforce its commitment to beef producers and livestock growers by delisting the gray wolf, avoiding misplaced litigation, and supporting ranchers by honoring the partnership between Oregon, ODFW, conservation groups and the OCA. Please support HB 4040.

Thank you,

John O’Keeffe, President