ROCKY MOUNTAIN ELK FOUNDATION



October 12, 2015

Chairman Michael Finley
Oregon Fish and Wildlife Commission
4034 Fairview Industrial Drive SE
Salem, OR 97302

E-mail: odfw.comments@state.or.us; odfw.commission@coho2.dfw.state.or.us

Re: Recommendation to remove the gray wolf from the Oregon Endangered Species List

Chair Finley and Members of the Commission:

As indicated in our April 23, 2015 comment letter, the Rocky Mountain Elk Foundation (RMEF) continues to strongly recommend a statewide removal of the gray wolf from the Oregon Endangered Species list.

At the October 9th Oregon Fish and Wildlife Commission meeting, staff presented the Updated Biological Status Review and Evaluation of Criteria to Remove the Gray Wolf from the List of Endangered Species under the Oregon Endangered Species Act. This document clearly indicates that through careful management by dedicated wildlife biologists, Oregon's wolf population has become firmly established, is expanding its range across the state, is growing at an annual rate of greater than 40 percent, and has more than achieved the established threshold to be considered for delisting. The document clearly indicates that the current gray wolf population exceeds each of the five statutory requirements for statewide removal from the Oregon Endangered Species List. It also clearly states that it is extremely unlikely that Oregon's wolves will be in danger of falling below the conservation-failure threshold within the next 50 years.

When first written and published in 2005 with stakeholder participation (and revised in 2010) the Oregon Gray Wolf Conservation and Management Plan envisioned removal of the wolf from the endangered species list upon achievement of the plan's stated population objectives for Phase One. The wolf population has surpassed that threshold and is now in Phase Two management. The plan calls for delisting the wolf prior to entering Phase Three management, the sustainment phase where the wolf population will be managed in concert with its wild prey base and interaction with human activities, principally raising livestock. Delisting should take place now, as prescribed in the management plan.

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Oregon's wolf population is rapidly approaching the point where human tolerance and unacceptable impacts upon the wolf's deer and elk prey base must be addressed. Removal of the wolf from the Endangered Species List marks the successful conservation accomplishments intended by the Oregon Endangered Species Act, and will materially contribute to management of the wolf into the future.

The Rocky Mountain Elk Foundation is a non-profit conservation organization whose mission is to ensure the future of elk, other wildlife, their habitat, and our hunting heritage. RMEF also works to open, secure, and improve public access for hunting, and other recreation.

Thank you for the opportunity to submit our recommendation for statewide removal of the gray wolf from the Oregon Endangered Species List.

Sincerely,

M David Allen President & CEO