

*Via email and certified mail*

Oregon Department of Fish and Wildlife Commission  
4034 Fairview Industrial Drive SE  
Salem, OR 97302  
odfw.commission@state.or.us

Re: Proposed 2015 Siskiyou Plus Bear Hunt

October 7, 2014

Dear Chair Levy and Commission Members,

The proposed 2015 “Siskiyou Plus Bear Hunt” would make 250 additional spring bear hunting tags available in the Southwest Region of Oregon. The undersigned organizations urge the Commission to reject this proposal.

Our organizations are concerned that the increased springtime hunting of bears will place cubs at risk, leading to increased costs to the state and Oregonians. Spring bear hunts already pose a great threat to bears when they are emerging from winter hibernation and are most vulnerable. Black bears do not emerge from their dens at all during hibernation—not even for food and water. After this long period of inactivity, the bears remain lethargic for a couple of weeks while they replenish nutrients.

Although hunters are not permitted to kill cubs less than one year of age or mothers with cubs less than one year of age, increased springtime hunting results in a heightened probability of the killing of mother bears that have young cubs. Mother bears care for cubs from the time of birth in January until June of the following year—17 months—so orphaned cubs are extremely susceptible to death from starvation, predation or exposure to the elements. Even if regulations are followed, cubs could be orphaned during the final seven months of rearing. Further, mother bears tend to forage great distances from their cubs, so it is not unlikely that mothers with dependent cubs will be accidentally killed.

The orphaning of bear cubs is not only a tragic circumstance, but also leads to high costs for the Department and the public. If discovered, any Departmental response to orphaned cubs requires the expenditure of a large amount of resources to euthanize, relocate, monitor, or place the cubs in temporary or permanent captivity. The Department needs to determine whether the \$3,750 it will generate if it sells every extra tag will outweigh potential costs associated with just a single orphaned cub.

Additionally, if orphaned cubs are not discovered by the Department or found and left to fend for themselves, these cubs tend to become increasingly reliant upon humans for survival, leading to increased conflicts between humans and bears. This raises public safety concerns and further Departmental costs for addressing these wildlife conflicts.

Wildlife is of great concern to all Oregonians, and the Department and Commission is under statutory direction to maintain all species of wildlife at optimum levels. If the Department wants to pursue increased bear hunting in the state, efforts should be made to generate population numbers/estimates before such efforts are undertaken.

Thank you for your consideration, and please contact us if we can provide any further information on the issues raised above.

Sincerely,

A handwritten signature in black ink, appearing to read 'Nick Cady', with a stylized, cursive flourish at the end.

Nick Cady, Legal Director  
Cascadia Wildlands

On behalf of:

Scott Beckstead, Senior Oregon Director  
Humane Society of the United States

Noah Greenwald, Endangered Species Coordinator  
Center for Biological Diversity

Sally Mackler, Oregon Carnivore Representative  
Predator Defense

Steve Pedery, Conservation Director  
Oregon Wild

Joseph Vaile, Director  
Klamath Siskiyou Wildlands Center

Dave Willis, Chairman  
Soda Mountain Wilderness Council

Cc: Curt Melcher, Governor Kitzhaber