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PLEASE RESPOND TO:

November 5, 2015

Oregon Fish and Wildlife Commission 4034 Fairview Industrial Drive S.E. Salem, Oregon 97302

Dear Chairman Finley and Commissioners,

I understand you are considering a recent recommendation by the Oregon Department of Fish and Wildlife (Department) to delist the gray wolf from the state Endangered Species Act. Wolves have just begun to recover in Oregon and still only inhabit small portions of their historical range. I believe the Department's recommendation is premature and not supported by the best available science and I urge you to reject it.

The entire nation has been riveted by the journey of OR-7 and the ongoing establishment of wolves in areas such as western Oregon where they have not been present in sixty-eight years. I'm proud of the work that Oregon has done to get to this point. Despite the success we have had in Oregon, wolf recovery is still at a very fragile, early stage in recovery. Wolves have just moved out of the first recovery phase in the state's eastern recovery zone, and have populated just 11 percent of suitable habitat in the state. Population numbers are simply not high enough and distribution not wide enough to warrant a state delisting. The reintroduction of wolves in the northern Rockies started with 66 wolves, just 11 less than Oregon currently has.

With my extensive experience with federal wolf delisting efforts, I know it is critically important that wildlife management, especially management of an iconic predator species like the gray wolf, is based upon sound scientific findings and analysis. The fact that the Department decided not to conduct a thorough scientific review is alarming, especially since the pending federal proposal to delist the gray wolf has been mired in controversy over both the science used to justify the delisting as well as improper influence by the U.S. Fish and Wildlife Service on the independent peer-review panel. It is critical that the Department and Commission take a precautious approach and avoid risks to species recovery. While I am encouraged by the hard work the Department put into the wolf status review, the Department should conduct an external, independent peer-review panel of its proposal to ensure a scientifically defensible path forward that is consistent with Oregon's Endangered Species Act.

Caution needs to be exercised and delisting could signal to some that it is "open season" on wolves. The experiences of other states such as Idaho and Wyoming provide evidence of this. It is critical we avoid any increases in wolf mortality during this early recovery period. We cannot

simply hunt wolves back down to their lowest sustainable population levels. Just last month the alpha pair of the Sled Springs pack was mysteriously found dead near Enterprise. This should not be tolerable in Oregon.

The extensive non-lethal efforts and stakeholder outreach by the Department have made Oregon the model for wolf conservation in the nation. Delisting will signal a sharp departure from these efforts that have made wolf recovery a success so far in our state. Conducting an external scientific peer review on the Department's proposal to ensure it can move forward with legal and scientific confidence is the right path forward. I urge you to reject this premature delisting decision that could harm wolf recovery efforts in Oregon. Thank you for your consideration of this important matter.

Sincerely,

Peter DeFazio