



April 22, 2026

Oregon Fish and Wildlife Commission  
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**Re: Wallowa County Wolf Resolution and Wolf Plan Implementation**

Dear Chair Wahl, Vice Chair Hatfield-Hyde, and Members of the Commission:

On behalf of the Oregon Wildlife Coalition, we would like to address the content of the Resolution approved by the Wallowa County Board of Commissioners on January 7, 2026, which is likely to be discussed during the upcoming April 24, 2026 Commission meeting by the Wallowa County Wolf Population Management panel. The Resolution uses several oversimplified claims not grounded in science to call for misguided actions such as an arbitrary population cap, pack size cap, and public wolf hunting and trapping in Wallowa County while wolves are still recovering in Oregon.

**1. Nonlethal strategies are the key to reducing wolf-livestock conflicts.**

For the producers who experience conflicts with wolves, it is impactful. However, nonlethal, proactive deterrence strategies – such as carcass and attractant removal, consistent range riding, low-stress livestock handling, and night-penning, as well as shorter term tools such as fladry and foxlights – are more effective at reducing conflict than reactive killing after-the-fact or indiscriminate killing by the public.<sup>1</sup> To accomplish long-term, durable conflict reduction, resources should be focused on supporting producers in utilizing these tools, as well as state and federal staff support.

According to the 2025 ODFW Annual Wolf Conservation and Management Report, conflicts with livestock are growing at a slower rate than the wolf population. ODFW reported to the Commission in December 2023 during the wolf plan review process that, between 2013 and 2023, about two-thirds of livestock producers only experienced a single wolf predation event in a given year.<sup>2</sup>

Oregon has made significant progress to reduce conflicts. State and federal non-lethal staff are working with dozens of producers to minimize the impacts of wolves on livestock. NGOs have also contributed to specific non-lethal efforts including livestock guardian dogs GPS collars, fencing projects, scare devices and efforts to support prompt deadstock removal.

The recent passage of HB 4134 will bring additional support to producers in the form of a new ODFW Wolf Coexistence Biologist and dedicated funding to County Depredation and Compensation Committees. This funding will support both nonlethal deterrents and the up to 5-times market value multiplier for compensation of livestock lost to wolves, as a result of the completion of rulemaking following the passage of SB 777. This holds the promise of increasing the efficacy of conflict reduction envisioned in the wolf plan and reducing economic impact on producers.

## 2. Wolves are not having a negative impact on ungulate populations.

Data and ample research refute the claims that wolves are having a significant deleterious effect on elk, deer, and moose populations. According to ODFW population monitoring data, both elk and mule deer populations have increased in Wallowa County since the first breeding pair of wolves was documented in 2008.<sup>3</sup> While population monitoring methods may have changed since 2008, there is clearly not a significant decline in either species in the region (see Figures 1 and 2).

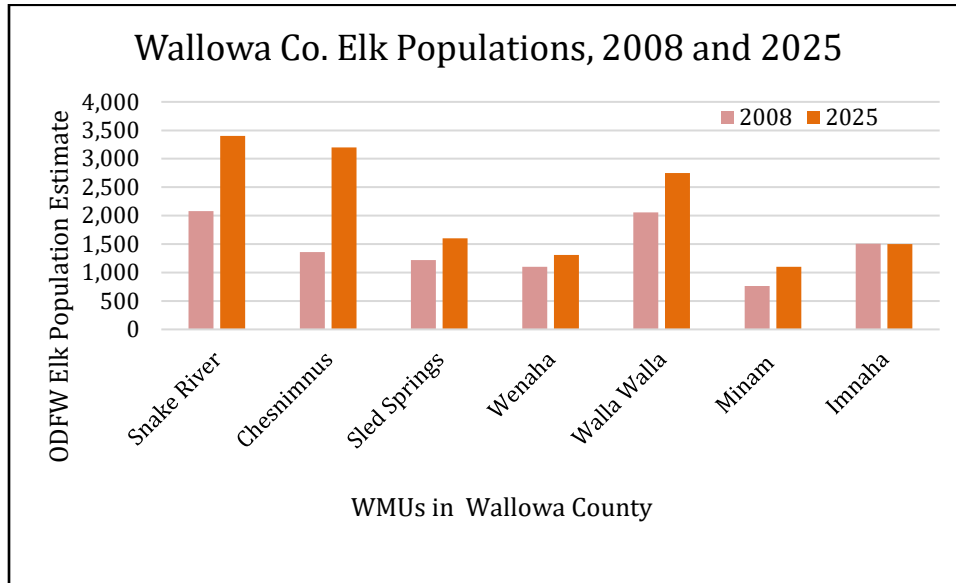


Figure 1. ODFW elk population estimates in Wildlife Management Units (WMUs) in Wallowa County in 2008, at the beginning of wolf recovery, and in 2025.

Data from [ODFW Big game survey population data](#), [ODFW 2008 Big Game Statistics](#)

Trump et al. (2022) found that despite increasing numbers of grizzly bears, cougars and wolves, *elk hunters in Alberta killed more elk* over time and their success rate increased.<sup>4</sup> Studies on elk show that even the mere risk of human hunters has a greater indirect effect on elk resource selection than does wolf predation risk, and Montana's elk have been found to prioritize selecting habitats that will reduce their risk of human hunters when faced with a choice between hunters and wolves.<sup>5</sup> In other words, human hunters more likely influence elk behaviors than do wolves.

The West's mule deer populations are in decline because of many factors including habitat loss and fragmentation, instances of wildlife-vehicle collisions resulting in animal injury and fatality, changes in forage quality, competition with other ungulates (e.g., elk and livestock), disease (e.g., CWD), hunting, poaching, drought, fire suppression, noxious weeds, housing and energy development, and fluctuations in snowpack and temperatures.<sup>6</sup> Mule deer densities are linked to their access to nutrition.<sup>7</sup> The key to mule deer survival is their access to adequate nutrition and protecting breeding females.<sup>8</sup> In predator-control studies, predator removals did not benefit mule deer.<sup>9</sup> In the absence of predators, deer would have died from some other cause.<sup>10</sup>

In their review article that surveyed 48 predation studies involving mule deer, Forrester and Wittmer (2013) determined that, while predation was the primary cause of deer mortality, studies indicate that “predation is compensatory, particularly at high deer densities, and that nutrition and weather shape population dynamics.”<sup>11</sup> In other words, each year, some deer are “doomed surplus”; that is, some deer will die no matter what.<sup>12</sup> The number of mule deer hunters and the number of mule deer hunted in Oregon has been declining since the 1970s, and the mule deer population has been declining since the 1980s or before—long prior to the return of wolves to Oregon.<sup>13</sup>

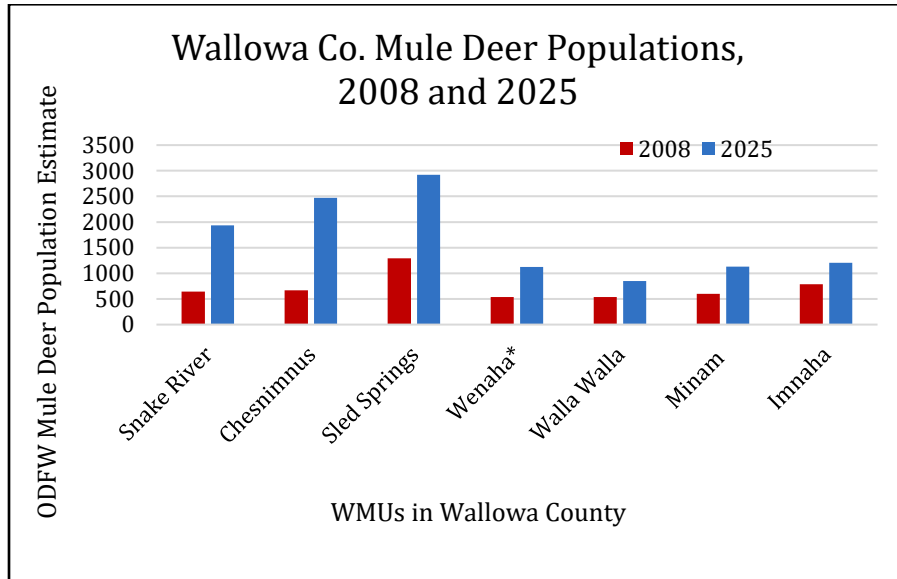


Figure 2. ODFW mule deer population estimates in Wildlife Management Units (WMUs) in Wallowa County in 2008, at the beginning of wolf recovery, and in 2025.  
 \*Wenaha data from 2024.  
 Data from: [ODFW Big game population survey data](#), [ODFW 2008 Big Game Statistics](#)

The best available science demonstrates that killing native carnivores to increase ungulate populations is unlikely to produce positive results. Numerous recent peer-reviewed studies found that predator removal actions “generally had no effect” in the long term on ungulate populations.<sup>14</sup> Since predators target weak individuals, much predation can be “compensatory” mortality, meaning the prey animal was likely to die anyway of another cause such as starvation or disease.<sup>15</sup> ODFW has previously implemented targeted cougar reduction efforts, all of which were unsuccessful and “failed to exhibit measurable responses” on mule deer populations.<sup>16</sup> Out of seven target areas between 2009 and 2017, zero were successful.<sup>17</sup>

**Table 6.** Location and results from Oregon cougar target areas from 2009 to 2017.

Location	General location	Target Area Objective	Met Objective	Met Removal Objective	Mule Deer Response
Heppner WMU	NE Oregon	Improve elk populations	Yes	No	No effect
Heppner WMU*	NE Oregon	Improve mule deer populations	No	Yes	N/A
Ukiah WMU	NE Oregon	Improve elk populations	Yes	No	Not measured
Wenaha WMU	NE Oregon	Improve elk populations	No	No	No effect
Steens Mtn WMU	SE Oregon	Improve mule deer populations	No	No	N/A
Warner WMU	S central Oregon	Improve mule deer populations	No	No	N/A
Interstate WMU	S central Oregon	Improve mule deer populations	No	No	N/A

\*Coyote control area

Table 6 on page 79 of ODFW's 2024 Oregon Mule Deer Management Plan.<sup>18</sup>

Predators also target sick animals, including those with chronic wasting disease.<sup>19</sup> Killing carnivores potentially weakens our most valuable tool in slowing the spread of chronic wasting disease and other diseases impacting ungulates in Oregon, such as epizootic hemorrhagic disease.

### **3. Indiscriminate wolf hunting and arbitrary population caps would do more harm than good.**

Science does not support indiscriminate wolf hunting as a means to reduce conflicts with livestock. Research in Montana examining wolf predation on livestock between 2005-2015 demonstrated that public wolf hunting did not reduce recurrent predations on livestock.<sup>20</sup> Similar results were found in hunted wolf populations in Slovakia and Slovenia.<sup>21</sup>

Killing wolves can destabilize their social structure, potentially worsening conflicts.<sup>22</sup> Killing a breeding adult wolf can cause pack dissolution. Cassidy et al. (2023) found that human-caused mortality lowered a pack's ability to persist by 71% when compared with wolves who faced no human persecution.<sup>23</sup> Some livestock producers find that building an understanding of their resident pack's habits and land use is essential to successfully adapting their operation to minimize conflicts. Indiscriminate killing, such as through public wolf hunting or predator control, leaves vacancies for new, unknown wolves to move into an area. Elbroch and Treves (2023) conclude, "[L]ethal removal has negative impacts on communities, both through potential carnivore social disruption that may impact the safety of other people's livestock, as well as the cascading impacts of carnivore removal on ecosystem health."<sup>24</sup>

Many studies have questioned the effectiveness of killing native carnivores to reduce conflicts with livestock.<sup>25</sup> Non-lethal methods to prevent conflicts are more effective, economical, sustainable, and humane than killing wolves,<sup>26</sup> as demonstrated by producers across Oregon and in other western states, including in the Tom Miner Basin of Montana. Research finds that the best ways to protect livestock come from non-lethal measures.<sup>27</sup>

Wolf populations do not need "management" through indiscriminate hunting, as their populations are generally controlled by their territorial nature as well as prey and habitat availability.<sup>28</sup> Oregonians also do not support wolf hunting as a means to address livestock-wolf conflict. A 2016 public opinion survey of 800 registered Oregon voters interviewed by phone by professional polling firm Mason-Dixon Polling & Research, Inc. revealed that 72.4 % of

Oregonians overall oppose the hunting of wolves to address conflicts with livestock. Rural opposition to hunting wolves to address livestock conflicts was even higher, at 73.8 %.<sup>29</sup>

Wallowa County's wolves remain essential to wolf recovery in Oregon as a source population. As the wolf population stabilizes in Northeast Oregon, and given Idaho's extreme wolf-killing policies, dispersing wolves from Wallowa County are crucial to establishing new packs and providing essential genetic exchange across Oregon. Reducing the Wallowa County wolf population through killing would slow recovery and harm Oregon's statewide wolf population.

#### **4. Wolves do not pose a significant threat to human safety.**

There has not been a single wolf attack on a human in Oregon since wolves began recovering, nor has there been an attack in the Western United States since wolf reintroduction in 1995 apart from a single fatal attack in Alaska. One single attack occurred in the Lower 48, a bite to a camper by a wolf with a jaw deformity. Only four other attacks have occurred in North America between 2002-2020 - one more fatal attack and 3 injurious attacks – all in Canada.<sup>30</sup> Several of these wolves had been food-conditioned. For perspective, lightning strikes killed more than 40 Canadians during that period.<sup>31</sup> On average, four people die and 521 people are seriously injured in wildlife-vehicle collisions each year in Oregon.<sup>32</sup>

While any wild animal, including wolves, can become habituated or can be unpredictable, wolves do not pose more of a danger than any other Oregon wildlife, and killing a wolf in self-defense is legal across Oregon. In a review of wolf-human conflicts, researchers state that "...the risks associated with a wolf attack are above zero, but far too low to calculate."<sup>33</sup> Simply seeing a wolf does not indicate a public safety threat; wolves are curious animals who may not always immediately flee, and they can and do exist near human development and activity without posing a threat to humans.<sup>34</sup>

We applaud ODFW's efforts to educate the public regarding wolf behavior, particularly following several recent high-profile sightings in Central Oregon. Incidents of wolves becoming habituated should be addressed on a case-by-case basis, and hazing should be implemented whenever possible and practical.

#### **5. Focus should be on improving the implementation of the Oregon Wolf Conservation and Management Plan.**

The Oregon Wolf Plan's goal is to "ensure the conservation of...wolves as required by Oregon law while protecting the social and economic interests of all Oregonians." The Resolution's proposed aggressive population restrictions, use of hunting for lethal control, and stigmatization of wolves would be contrary to that goal. The Oregon Wolf Plan requires ODFW to use the "best available science" as well as "[seeking] comments from scientific and management experts in Oregon and other western states" to make recommendations to the Commission for any changes to the Plan. The resolution does not incorporate "best available science" and, by all appearances, the process by which the Resolution was adopted did not invite comments from scientific and management experts.

The appropriate time to propose revisions to the wolf plan is during the stakeholder engagement process during the 5-year plan revision process. At this time, ODFW, the Commission, and stakeholders should be continuing the work to improve implementation of the wolf plan – including reducing conflicts and reducing wolf poaching – until the process to update the Wolf Conservation and Management Plan begins. In the meantime, the landmark passage of HB 4134 will provide new resources and avenues for achieving these goals.

We look forward to engaging in further conversations regarding wolves in Oregon.

Sincerely,

Humane World for Animals  
Western Environmental Law Center  
Cascadia Wildlands  
Think Wild  
Defenders of Wildlife

Oregon Wild  
Bird Alliance of Oregon  
Humane Voters Oregon  
Willamette Riverkeeper

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<sup>1</sup> Andelt, W. F. (1996). Carnivores. In P. R. Krausman (Ed.), *Rangeland Wildlife* (pp. 133-56 ). Society for Range Management: Denver; Eklund, A., López-Bao, J. V., Tourani, M., Chapron, G., & Frank, J. (2017). Limited evidence on the effectiveness of interventions to reduce livestock predation by large carnivores. *Scientific reports*, 7(1), 2097; Parks, M., & Messmer, T. (2016). Participant perceptions of Range Rider Programs operating to mitigate wolf–livestock conflicts in the western United States. *Wildlife Society Bulletin*, 40(3), 514-524; Stone, S. A., Breck, S. W., Timberlake, J., Haswell, P. M., Najera, F., Bean, B. S., & Thornhill, D. J. (2017). Adaptive use of nonlethal strategies for minimizing wolf–sheep conflict in Idaho. *Journal of Mammalogy*, 98(1), 33-44; Treves, A., & Karanth, K. U. (2003). Human-carnivore conflict and perspectives on carnivore management worldwide. *Conservation biology*, 17(6), 1491-1499.

<sup>2</sup> ODFW and Oregon Fish and Wildlife Commission Wolf Conservation and Management Workshop, December 2023 <https://www.youtube.com/playlist?list=PLLeHsPDijGYdHenfzYZNBcYnlyIn3fDE>

<sup>3</sup> [ODFW Big game survey population data](#), [ODFW 2008 Big Game Statistics](#)

<sup>4</sup> Trump et al., "Sustainable Elk Harvests in Alberta with Increasing Predator Populations."

<sup>5</sup> Shawn M. Cleveland et al., "Linking Elk Movement and Resource Selection to Hunting Pressure in a Heterogeneous Landscape," *Wildlife Society Bulletin* 36, no. 4 (2012).

<sup>6</sup> See, e.g., K. L. Monteith et al., "Life-History Characteristics of Mule Deer: Effects of Nutrition in a Variable Environment," *Wildlife Monographs* 186, no. 1 (2014); T. D. Forrester and H. U. Wittmer, "A Review of the Population Dynamics of Mule Deer and Black-Tailed Deer *Odocoileus Hemionus* in North America," *Mammal Review* 43, no. 4 (2013). H. E. Johnson et al., "Increases in Residential and Energy Development Are Associated with Reductions in Recruitment for a Large Ungulate," *Glob Chang Biol* 23, no. 2 (2017).

<sup>7</sup> Ibid.

<sup>8</sup> Monteith et al., "Life-History Characteristics of Mule Deer: Effects of Nutrition in a Variable Environment."; Forrester and Wittmer, "A Review of the Population Dynamics of Mule Deer and Black-Tailed Deer *Odocoileus Hemionus* in North America."; B. M. Pierce et al., "Top-down Versus Bottom-up Forcing: Evidence from Mountain Lions and Mule Deer," *Journal of Mammalogy* 93, no. 4 (2012); C. D. Mitchell et al., "Population Density of Dall's Sheep in Alaska: Effects of Predator Harvest?," *Mammal Research* 60, no. 1 (2015). Lennox et al., "Evaluating the Efficacy of Predator Removal in a Conflict-Prone World."

<sup>9</sup> Forrester and Wittmer, "A Review of the Population Dynamics of Mule Deer and Black-Tailed Deer *Odocoileus Hemionus* in North America."

<sup>10</sup> Monteith et al., "Life-History Characteristics of Mule Deer: Effects of Nutrition in a Variable Environment."

<sup>11</sup> Forrester and Wittmer, "A Review of the Population Dynamics of Mule Deer and Black-Tailed Deer *Odocoileus Hemionus* in North America," p. 292.

<sup>12</sup> Monteith et al., "Life-History Characteristics of Mule Deer: Effects of Nutrition in a Variable Environment."

<sup>13</sup> Oregon's Mule Deer Management Plan (2024), Oregon Department of Fish and Wildlife

[https://www.dfw.state.or.us/wildlife/management\\_plans/mule\\_deer/2024\\_Mule\\_Deer\\_Management\\_Plan\\_Final\\_14\\_June\\_24.pdf](https://www.dfw.state.or.us/wildlife/management_plans/mule_deer/2024_Mule_Deer_Management_Plan_Final_14_June_24.pdf).

<sup>14</sup> Trump, T. , K. Knopff, A. Morehouse, and M. Boyce. "Sustainable Elk Harvests in Alberta with Increasing Predator Populations." *PLoS ONE* 17, no. 10 (2022).

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<sup>15</sup> Monteith et al., "Life-History Characteristics of Mule Deer: Effects of Nutrition in a Variable Environment." Forrester and Wittmer, "A Review of the Population Dynamics of Mule Deer and Black-Tailed Deer *Odocoileus Hemionus* in North America," p. 292.

<sup>16</sup> Oregon's Mule Deer Management Plan (2024), Oregon Department of Fish and Wildlife [https://www.dfw.state.or.us/wildlife/management\\_plans/mule\\_deer/2024\\_Mule\\_Deer\\_Management\\_Plan\\_Final\\_14\\_June\\_24.pdf](https://www.dfw.state.or.us/wildlife/management_plans/mule_deer/2024_Mule_Deer_Management_Plan_Final_14_June_24.pdf).

<sup>17</sup> Oregon's Mule Deer Management Plan (2024), Oregon Department of Fish and Wildlife [https://www.dfw.state.or.us/wildlife/management\\_plans/mule\\_deer/2024\\_Mule\\_Deer\\_Management\\_Plan\\_Final\\_14\\_June\\_24.pdf](https://www.dfw.state.or.us/wildlife/management_plans/mule_deer/2024_Mule_Deer_Management_Plan_Final_14_June_24.pdf).

<sup>18</sup> Oregon's Mule Deer Management Plan (2024), Oregon Department of Fish and Wildlife [https://www.dfw.state.or.us/wildlife/management\\_plans/mule\\_deer/2024\\_Mule\\_Deer\\_Management\\_Plan\\_Final\\_14\\_June\\_24.pdf](https://www.dfw.state.or.us/wildlife/management_plans/mule_deer/2024_Mule_Deer_Management_Plan_Final_14_June_24.pdf).

<sup>19</sup> Ellen E. Brandell et al., "Examination of the Interaction between Age-Specific Predation and Chronic Disease in the Greater Yellowstone Ecosystem," *Journal of Animal Ecology* (2022); C. E. Krumm et al., "Mountain Lions Prey Selectively on Prion-Infected Mule Deer," *Biology Letters* 6, no. 2 (2009). ; Escobar LE, Pritzkow S, Winter SN, Grear DA, Kirchgessner MS, Dominguez-Villegas E, Machado G, Townsend Peterson A, Soto C. The ecology of chronic wasting disease in wildlife. *Biol Rev Camb Philos Soc.* 2020 Apr;95(2):393-408. doi: 10.1111/brv.12568. Epub 2019 Nov 21. PMID: 31750623; PMCID: PMC7085120; Barrile, G. M., Cross, P. C., Stewart, C., Malmberg, J., Jakopak, R. P., Binfet, J., Monteith, K. L., Werner, B., Jennings-Gaines, J., & Merkle, J. A. (2024). Chronic wasting disease alters the movement behavior and habitat use of mule deer during clinical stages of infection. *Ecology and Evolution*, 14, e11418. <https://doi.org/10.1002/ece3.11418>. Hobbs, N. T. (2006). A model analysis of effects of wolf predation on prevalence of chronic wasting disease in elk populations of Rocky Mountain National Park. *Report submitted to the National Park Service*. Wild, M. A., Hobbs, N. T., Graham, M. S., & Miller, M. W. (2011). The role of predation in disease control: a comparison of selective and nonselective removal on prion disease dynamics in deer. *Journal of Wildlife Diseases*, 47(1), 78-93.

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<sup>24</sup> L. Mark Elbroch, Adrian Treves, Perspective: Why might removing carnivores maintain or increase risks for domestic animals?, *Biological Conservation*, Volume 283, 2023, 110106, ISSN 0006-3207, <https://doi.org/10.1016/j.biocon.2023.110106>.

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- <sup>27</sup> *Id.*
- <sup>28</sup> Eg., Wallach, A. D., Izhaki, I., Toms, J. D., Ripple, W. J., & Shanas, U. (2015). What is an apex predator?. *Oikos*, 124(11), 1453-1461.
- <sup>29</sup> Pacific Wolf Coalition Oregon Voter Survey, September 2016 [Questionnaire](#)
- <sup>30</sup> Linnell, J. D. C., Kovtun, E. & Rouart, I. 2021. Wolf attacks on humans: an update for 2002–2020. NINA Report 1944 Norwegian Institute for Nature Research. Trondheim, January, 2021 ISSN: 1504-3312 ISBN: 978-82-426-4721-4
- <sup>31</sup> Lightning fatality and injury statistics in Canada, <https://www.canada.ca/en/environment-climate-change/services/lightning/safety/fatalities-injury-statistics.html>
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