Exhibit E

Supplemental
Public Correspondence received as of
September 13, 2019

Roxann B Borisch

From: Levi, Taal <Taal.Levi@oregonstate.edu>
Sent: Friday, September 13, 2019 3:37 PM
To: odfw.commission@state.or.us
Subject: Humboldt marten scientific comment for September 13th meeting

Categories: Forwarded to Wildlife

I have been reluctant to advocate a position for the current agenda item regarding marten, but I do think that it is important to have scientific comment on this agenda item. It should be noted that Humboldt marten could very well be be federally listed shortly. Somehow there is no mention of that in the analysis by ODFW. At that time, my understanding is that it would not be legal to take Humboldt marten and the petition request would be moot. But nevertheless, the analysis makes several points that require rebuttal.

First, in conversations with Derek Broman he has consistently made the point that marten harvest is very low, and this point is made in the analysis as well. One view is that this is evidence that trapping has no impact, but an alternative view is that marten are now so rare that this low harvest indexes the true state of the population. This alternative view is supported by the data. You cannot harvest animals where they do not occur, and Humboldt martens now occur in a tiny portion of coastal Oregon. In addition, a low average harvest is not the issue. The variance in harvest matters. Humboldt marten are now so rare, and marten are so trap happy, that a relatively small amount of trapping effort concentrated where marten still occur could eliminate the remnant population. Even if no marten are trapped for 5 years, one year where many females are taken could be quite impactful to subpopulations that could easily have fewer than 20 adult females remaining.

Second, ODFW mentions that a model that we published has "substantial problems with model assumptions" and that "focal areas experiencing an average of three human caused mortalities per year saw high probabilities of a population decline over a 30 year period." Both of these claims are false. The models predicted a high probability of extirpation, not population decline, and that probability of extirpation is higher at the lower range of plausible population sizes and at the higher range of harvests (3 being the highest average harvest, including roadkill, that we considered). This is a relatively data poor situation. We know that the populations have a small spatial extent, and we have a robust population estimate for the Oregon Dunes population, but we know little about age structure or demographic rates. We ran 18 models bracketing our uncertainty. The goal of these model is simply to illustrate clearly that small populations cannot handle much mortality. It is hard to imagine that anyone with a population modelling background would think a population of slow life history animals of only about 30 per subpopulation could handle a mean harvest of 2-3 individuals per year. The models are actually very conservative. There is no demographic stochasticity for instance, which can be a powerful force for very small populations. We made no consideration of inbreeding depression and no consideration of catastrophes despite the fact that perhaps the entire central coast population is in the tsunami zone. Such catastrophic events are also likely to be a threat to the viability of the southern Oregon population should a wildfire occur within the core of the remnant marten population. In addition, we conservatively assumed that the marten population is currently at carrying capacity. Thus, in our model a decline in the marten population below carrying capacity is counteracted by increased population growth that helps resist further declines.

Because Humboldt marten management is likely to be controversial, we published the full peer reviews of our paper. I previously made these available to the commission. The proper scientific protocol for challenging an idea or model is to present alternative assumptions, run a different model, and compare results so that we can have a competition of ideas. Instead, ODFW asserted that our model has problematic assumptions but did not state what those problems are nor how population projections would be different under an alternative set of assumptions.

Finally, the comment in the analysis about not trapping on the dunes potentially impacting plovers is odd. An inverse argument could be that plover depredation related trapping could result in incidental take of marten and thus should only be done by professionals and should be more tightly managed.

Taal Levi
Associate Professor of Wildlife
Oregon State University

Roxann B Borisch

From: marinarichie1@everyactioncustom.com on behalf of Marina Richie <marinarichie1@everyactioncustom.com>
Sent: Wednesday, September 11, 2019 5:00 PM
To: odfw.commission@state.or.us
Subject: Rare Humboldt Marten Must Be Protecttd

Dear ODFW Commission,

I respectfully ask the Commission to revise your proposed recommendation on trapping to truly protect the Humboldt marten. With only an estimated 200 in Oregon, that's a rare species. Every death from trapping puts this species closer to the edge. Please ban all trapping of martens in all Humboldt marten territory--defined by its historical range (west of the I-5 corridor. To make sure martens are not caught in traps set for other mammals, ban all mammal trapping in the existing Humboldt marten population areas (Oregon Dunes National Recreation Area, Siskiyou, and Siuslaw National Forests).

This is an important first step. Please amend ODFWs proposal as above before voting!

Thank you .

Sincerely,
Ms. Marina Richie
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marinarichie1@gmail.com