

Exhibit B

**Supplemental
Public Correspondence received as of
August 5, 2020**



Oregon

Kate Brown, Governor

Department of Fish and Wildlife

Wildlife Division
4034 Fairview Industrial Dr. S.
Salem, OR 97302
(503) 947-6301
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July 29, 2020



East Cascades Audubon Society
P.O. Box 565
Bend, OR 97709
gordonwetzels@gmail.com

RE: Hunting Regulations for Greater Sage-grouse

East Cascades Audubon Society:

Thank you for your communication to the Oregon Fish and Wildlife Commission regarding concerns for hunting greater sage-grouse in Oregon, specific to the 2020-21 Game Bird Regulations. The East Cascades Audubon Society is a valued partner in the conservation of sage-grouse and sagebrush habitats in Oregon and your input is important.

In your letter, you recognized that the Oregon Department of Fish and Wildlife (Department) takes a very conservative approach to setting sage-grouse seasons, and that the data provided by sage-grouse wings and tails is important. You requested clarity on the analysis and application of wing-bee data, and how this information translates to controlled hunt recommendations statewide and within PACs. You also expressed particular concern regarding additive mortality and the Brothers Priority Area for Conservation. I will address each of these points in a summative fashion, but detailed methodology can be found in the annual ODFW Sage-grouse Population Report at: <https://www.dfw.state.or.us/wildlife/sagegrouse/population.asp>

Regarding the annual controlled hunt permit recommendations, and how wing-bee data is used. First biologists must predict the fall population in each sage-grouse Wildlife Management Unit (WMU). This calculation includes the spring lek counts, but as you know, that only accounts for the males in the population. Sex ratios are obtained from the wing-bee data, which allows calculation of the number of females in the projected fall population. This data is pooled by Data Analysis Unit (DAU) to improve statistical inference by grouping WMUs that have geographic and flock trend similarities. Accounting for the number of juveniles in the projected fall population is more difficult, as low sample sizes for summer brood counts have reduced confidence in these production estimates. Beginning in 2019, the fall population calculation assumes a very conservative production rate of 0.5 chicks/hen, much lower than the long-term average of 1.5 chicks/hen as determined by the wing-bee.

Once the fall population is estimated for each WMU, the 5% harvestable surplus is calculated. Taking into account hunter success and participation rates by DAU, biologists can determine how many offered tags will result in harvest of 5% or less of

the WMU's population. Tag recommendations may also consider abiotic or human-dimensions factors. For example, with the reopening of the Trout Creek Mountains to hunting in 2019, biologists kept tag recommendations significantly more conservative than calculated because we predicted the population to be more naïve to hunting and might experience a higher harvest rate than expected. As another example, 2020 tag recommendations for the Steens WMU are lower than advised by the calculator due to poorer than expected hunter success in 2019.

In addition to sex and age ratios, examination of hunter-harvested sage-grouse wings also provide data on peak hatch date, nest success, and annual turnover (adult mortality). All of this information helps inform managers on potential causal factors related to sage-grouse population trends. Collection of this information by other means would be prohibitively expensive, stressful for birds requiring capture and transmitters, and not practical to collect at a scale comparable to the harvest collections.

Regarding the concern that harvest and hunting mortality become additive at a certain point, the best available science shows that mortality can become additive (e.g. mortality the exceeds the natural rate) at 11% harvest rate or greater (Sedinger et al. 2010). ODFW has a self-imposed policy not to harvest more than 5% of the fall population, though harvest is usually between 2-3%. This strategy is well within the guidelines suggested by the Western Association of Fish and Wildlife Agencies (Connelly et al. 2000).

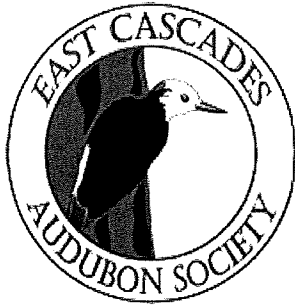
Your letter mentions specific concern for the Brothers PAC after several years of poor lek counts and tripping a BLM hard trigger. The Department shares your concern for this population and is pleased to report that 2020 spring lek counts indicate a 51.8% increase over the previous year. This PAC has been subject to very dry habitat conditions in recent years, and we believe the population increase is a direct response to improved range conditions after a wet year in 2019. Regarding harvest within the Brothers PAC, in 2019 the Department offered a conservative 20 permits on the North Wagontire WMU. Among successful applications, 12 people hunted and harvested 7 total birds. In addition to the usual harvest survey, biologists phoned each of these hunters individually to ask additional questions about where they hunted, other sage-grouse sightings and on-the-ground observations about habitat conditions and recreational disturbance. Eliminating hunting on this unit based on known harvest information would falsely indicate that harvest has any measurable impact on this flock. The Department will continue to monitor this situation carefully, but considers that value of the data and the negligible impact on the flock a viable reason to continue the hunt at a low rate.

Thank you again for engaging in this process. I am glad to discuss more details regarding the permit calculations or the harvest aspect of sage-grouse management at your convenience.

Sincerely,



Mikal Cline
Upland Game Bird Coordinator



East Cascades Audubon Society
PO Box 565
Bend, OR 97709

Via Email: odfw.commission@state.or.us

June 16, 2020

Chair Mary Wahl
Commission Members
Oregon Fish & Wildlife Commission
4034 Fairview Industrial Drive SE
Salem, R 97302

RE: Hunting Regulations for Greater Sage-Grouse

Dear Chair Wahl and Members of the Commission:

As you consider the upland game bird hunting seasons for 2020 we would like to share concerns relative to possible impacts to declining greater sage grouse (GSG) populations.

We understand ODFW's conservative approach to hunting the greater sage grouse and support the reduced tag numbers in areas that have had significant population reductions. Furthermore, we understand the desire for the data that hunting provides through the collection of harvested sage grouse wings and tails. In discussions with field biologists it has not always been clear how this information is used. We would like ODFW to explain the analysis and application of wing-bee data and how it and other biological factors inform the level of hunting opportunities proposed for sage grouse in the State of Oregon and within each of the Oregon PACs.

As per the 2011 ODFW Sage Grouse Strategy: "At some level of harvest, hunting mortality is likely to become additive, requiring the implementation of a conservative and controlled recreational harvest management strategy that is adaptive". Currently, because of the deteriorating situation of the GSG population over time in the Brothers Priority Area for Conservation (PAC), east of Bend Oregon, we think that implementation of more hunting restrictions are warranted. Based on the past 5 years of lek counts in this area the population has met the ODFW threshold of a hard trigger for population declines indicating a need to take actions to reverse the trend. Although hunting harvests have been minimal, we believe this could be additive to the overall population decline when populations like the Brothers PAC are at

historically low levels. We are working closely with BLM, ODFW and other concerned partners to address additional threats to these sage grouse populations as well as proposing cooperative habitat improvement projects. Until those are demonstrating effectiveness in restoring populations to this area, we believe the population stressor of hunting needs to be curtailed. We appreciate your consideration of our concerns and look forward to a response to the question above regarding the factors used for establishing hunting seasons and tag numbers for sage grouse.

Sincerely,
The ECAS Conservation Committee

The following organizations sign on to this letter:
Cape Arago Audubon Society, Harv Schubothe
Corvallis Audubon Society, William Proebsting, President
Kalmiopsis Audubon Society, Ann Vileisis, President
Klamath Basin Audubon Society, Darrel Samuels, President
Lane County Audubon Society, Debbie Schlenoff,
Portland Audubon, Bob Sallinger, Conservation Director
Rogue Valley Audubon Society, Carol Mockridge, President
Salem Audubon Society, David Harrison, Conservation Committee Chair
Umpqua Valley Audubon Society, Diana Wales

Roxann B Borisch

From: Michelle Tate
Sent: Thursday, July 30, 2020 2:11 PM
To: Mikal.L.Cline@state.or.us; Brandon Reishus
Cc: Roxann B Borisch
Subject: FW: OHA Gamebird Testimony
Attachments: OHA_Gamebird2020_Testimony.pdf

From: Tyler Dungannon <td@oregonhunters.org>
Sent: Thursday, July 30, 2020 1:52 PM
To: ODFW.Commission@state.or.us
Subject: OHA Gamebird Testimony

Dear Chair Wahl, Commissioners, and Director Melcher,

I have attached the Oregon Hunters Association's written testimony regarding greater sage-grouse management and the 2020-21 proposed changes to gamebird regulations. Within this document, you will also find a separate letter delineating my personal perspective given my tenure as a sage-grouse researcher.

Please let me know if you have any questions.

Thank you,

Tyler



Tyler Dungannon

Conservation Coordinator
Oregon Hunters Association

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Email: TD@OregonHunters.org

<https://oregonhunters.org>



OREGON HUNTERS ASSOCIATION

Protecting Oregon's Wildlife, Habitat and Hunting Heritage

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July 21, 2020

Re: Sage-Grouse Management and Gamebird Regulation Proposals

Dear Chair Wahl, Commissioners, and Director Melcher,

The Oregon Hunters Association (OHA) supports continued harvest of greater sage-grouse due to the indispensable biological data that it yields, and the recreational opportunity that it provides for the few successful permit applicants.

Estimating vital rates of sage-grouse is imperative for effective conservation and management of the species. However, collection of these data is expensive, and seldom feasible for the staff of Oregon Department of Fish and Wildlife (ODFW). Fortunately, sage-grouse hunters provide biological data by sending hundreds of harvested wings each year to ODFW for analysis of specific demographic parameters (e.g., nest success, sex ratio, and age structure). These data are also obtained in small areas (relative to the species range) by academic research projects, however the cost is tremendous, and not feasible throughout eastern Oregon. For example, the cost of collaring one female sage-grouse with a GPS transmitter to obtain vital rate data is greater than \$5,000 when considering the equipment, manpower and travel to remote areas that sage-grouse occupy. Further, hands-on research efforts result in occasional grouse mortality, and disturbance to flocks. OHA recognizes that these studies are absolutely necessary to better manage sage-grouse into the future, but hunter harvest data, and recognition of sage-grouse as a huntable species is equally important for its conservation.

There are many factors driving sage-grouse population decline, including predation, habitat loss, degradation, and fragmentation, but hunter harvest does not limit sage-grouse populations in Oregon. Moreover, hunters are at the front lines of conservation for the species, and it is imperative that sage-grouse maintain their gamebird status in order to receive support from hunting organizations, which substantially contribute to sage-grouse conservation.

OHA supports ODFW proposed changes to turkey season dates, lifting of tag quotas and closing the fall turkey season for White River Wildlife Management Area to allow greater opportunity during the spring. OHA applauds the ODFW proposal to add a 2-mountain quail daily bag limit in eastern Oregon, as well as the agency's support for expanded hunting opportunities on Hart Mountain, Nestucca Bay, and Wapato Lake National Wildlife Refuges.

Questions can be addressed to Tyler Dungannon, Conservation Coordinator (TD@OregonHunters.Org).

Sincerely,

Fred Walasavage
Board Chair



OREGON HUNTERS ASSOCIATION

Protecting Oregon's Wildlife, Habitat and Hunting Heritage

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Hunter Harvest Provides Invaluable Scientific Support for Sage-Grouse Conservation

July 21, 2020

Dear Chair Wahl, Commissioners, and Director Melcher,

Wildlife managers utilize harvest data in conjunction with research to better manage many taxa in Oregon. When sustainable (and sometimes conservative) harvest is possible for a given species, wildlife managers welcome these opportunities as both a data source and an opportunity to garner awareness and financial support for conservation. The Oregon Department of Fish and Wildlife (ODFW) has been no exception with regard to sage-grouse management.

I personally led a sage-grouse research project in the Warner Mountains as a part of my Master's of Wildlife Science degree at Oregon State University. This 10-year study has been monumental in describing mechanisms that may drive sage-grouse population growth rates, including but not limited to, encroachment of conifer on sagebrush ecosystems. My colleagues and I have achieved estimates of several vital rates, however, this research may not have been possible without support from groups that view sage-grouse as a huntable species, and in turn were willing to contribute volunteer hours and funding.

Between 2017 and 2019, I tagged more than 125 female sage-grouse in Oregon, and just 2 of those were harvested over the duration of my study. Both of those GPS transmitters were returned by the hunters, and those units were then redeployed on other individuals. Furthermore, I led numerous sage-grouse trapping crews, where we assisted ODFW efforts to band male sage-grouse for a harvest study underway in the Warner and Trout Creek Mountains. Here again, bands from harvested individuals were reported to ODFW. I have participated in wing-bees, where biologists analyze harvested wings, and have seen first-hand the great response from hunters. ODFW staff have shown they are well-organized, and capable of handling distribution of wing-return packets, and their harvest strategy is considered conservative. Specifically, Oregon sage-grouse harvest is never greater than 5% of fall populations, and actual harvest is estimated at 3% or less, which is much lower than other states. This rate of harvest will not have a population-level effect.

Collaborative efforts lead to improved wildlife conservation and management, and hunters are an integral part of this effort, and therefore should be allowed to contribute to our understanding of sage-grouse population dynamics.

Sincerely,

Tyler Dungannon
Conservation Coordinator