

# **Exhibit B**

**Supplemental  
Public Correspondence Received as of  
September 15, 2022**

**BORISCH Roxann B \* ODFW**

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**From:** Jayne Miller <orecat@yahoo.com>  
**Sent:** Thursday, September 15, 2022 4:09 PM  
**To:** COMMISSION ODFW \* ODFW  
**Subject:** COMMISSION AGENDA: Sept16, 2022, PUBLIC COMMENT MILLER, ALLYSON, ORECAT.ORG  
**Attachments:** Oregon Cougar Action Team, Comm. 2023 Cougar.docx  
**Categories:** Wildlife

RE: Written public comment

Thank you for this opportunity to address any cougar topics at the September 16, 2022, Commission meeting. I have attached a one-page document that may lend insight into our cougar management goals. If you have any questions or would like to have any of the graphs on the OSU public document sent to you for your use, please contact me at the above email and I will be happy to help you. I made my OSU Capstone on cougar research available to the public. It is linked and referenced on the attached document.

Kindest regards,  
Allyson Flagg-Miller  
Director, OreCat.org

Oregon Cougar Action Team (OreCat.org)  
Allyson Jayne Flagg-Miller, Director  
2755 Commercial St. SE  
101-263  
Salem, Oregon 96302  
[orecat@yahoo.com](mailto:orecat@yahoo.com)  
[WWW.OreCat.org](http://WWW.OreCat.org)  
971-720-7057

RE: The Commission for the Oregon Department of Wildlife 2023 Big Game Controlled Hunt Numbers, Season Dates, and Regulations regarding Cougar.

Issue:

Oregon faces two issues regarding the management of our cougar in Oregon.

- 1) Correcting the cougar model population count to exclude cougar kittens
  - a. Reference page 51 of the 2017 Cougar management plan stating Oregon has more or less 3,300 ADULT cougars, the rest are kittens affected by high mortality rates or not yet born. Reference page 21, 22, 23) of the below linked Oregon State University Capstone cougar research.
- 2) In the ODFW designated cougar harvest areas are increased cases of human and dog Lyme disease. Oregon State University research indicates that cougar mitigate Lyme disease. This is an annual billion-dollar economic opportunity loss in Oregon that far exceeds the economic gains of killing cougar for sport or public safety (reference graphs on pages: 65, 67, 69, 70, 73, 74. Reference data: 28, 29, 52 (Calif and OR cougar management cost comparisons).

Reference: [Graduate Project | The Cougar, The Tick, and Human Wellbeing: The Social, Economic, and Ecological Valuations of Living with Cougars in Oregon. | ID: 6h441114x | ScholarsArchive@OSU \(oregonstate.edu\)](#)

Thank you for this opportunity to address any cougar topics at the September 16, 2022, Commission meeting. If you have any questions or would like to have any of the graphs of my Masters research on cougar referenced in the above link, please contact me at the above email and I will be happy to help you.

Kindest regards,  
Allyson Flagg-Miller  
Director, OreCat.org

## WRIGHT Amanda L \* ODFW

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**From:** COMMISSION ODFW \* ODFW  
**Sent:** Thursday, September 15, 2022 2:23 PM  
**To:** WRIGHT Amanda L \* ODFW  
**Subject:** FW: Mountain Lion Foundation comments regarding 635 Big Game Controlled Hunt Numbers, Season Dates, and Regulations - Cougar  
**Attachments:** Mountain Lion Foundation-Big Game Regulations -Cougar Comments.pdf

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**From:** Paige Munson <Pmunson@mountainlion.org>  
**Sent:** Wednesday, September 14, 2022 12:13 PM  
**To:** COMMISSION ODFW \* ODFW <ODFW.COMMISSION@odfw.oregon.gov>  
**Cc:** Josh Rosenau <jrosenau@mountainlion.org>  
**Subject:** Mountain Lion Foundation comments regarding 635 Big Game Controlled Hunt Numbers, Season Dates, and Regulations - Cougar

Dear ODFW staff and members of the Commission,

Please find the attached comments of the Mountain Lion Foundation regarding the upcoming decision regarding Chapter 635 Big Game Controlled Hunt Numbers, Season Dates, and Regulations.

Please feel free to reach out to us for any additional information or resources.

Many thanks for the work you all do.

Warm regards,

Paige Munson, State Policy Associate, Field Biologist  
she/her/hers  
Mountain Lion Foundation  
mountainlion.org  
[pmunson@mountainlion.org](mailto:pmunson@mountainlion.org)  
[916-442-2666](tel:916-442-2666) X 104



# MOUNTAIN LION FOUNDATION

## *Saving America's Lion*

Oregon Department of Fish and Wildlife  
4034 Fairview Industrial Drive SE  
Salem, Oregon 97302

**RE:** Chapter 635: Big Game Controlled Hunt Numbers, Season Dates, and Regulations

**Submitted via:** [odfw.commission@odfw.oregon.gov](mailto:odfw.commission@odfw.oregon.gov)

September 13, 2022

Dear ODFW Commission members and staff,

We write to you on behalf of our Oregon members for the review of the *Chapter 635: Big Game Controlled Hunt Numbers, Season Dates, and Regulations*.<sup>1</sup> For the upcoming decision regarding cougar hunting regulations and future cougar management plans, we ask the Department to include the following provisions for managing cougars in Oregon:

- 1. Reduce the cougar mortality quota to 12 percent of the adult population**
- 2. Prioritize research to help validate the current population model for cougars**
- 3. Implement a season closure from June to November to reduce kitten orphaning**
- 4. Implement a female sub-quota of 20 percent to ensure population stability**

We find these recommendations to best align with current cougar research, the Department's mission to "protect and enhance Oregon's fish and wildlife and their habitats for use and enjoyment by present and future generations,"<sup>2</sup> and the objective to maintain a cougar

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<sup>1</sup> Oregon Department of Fish and Wildlife. 2022. Division 067: Pronghorn Antelope, Cougar, Rocky Mountain Goat, Bighorn Sheep Regulations. Oregon Administrative Rules 43-44.

<sup>2</sup> Oregon Department of Fish and Wildlife. 2022. *Agency Mission*. Web. <https://www.dfw.state.or.us/agency/>

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number of 6,610 cougars of all ages, and 3,300 of those being adults approaching its carrying capacity.<sup>10</sup>

This model has many merits, but it lacks validation, making it an imprecise technique for population estimation. This imprecision does not negate the value of population modeling for the cougar population, but simply means that management should reflect the variability that a model cannot account for. The original cougar population model for Oregon was created in 2002 and was last updated in 2017. The model factors birth rate, mortality data, density data, and a resource selection function. Additionally, the model is applied to each of the zones used for cougar management, not treating the state as a continuous unit. The original model accounted for a 160 annual cougar hunting harvest so as not to exceed 10 percent and total mortality would not exceed 35 percent mortality, to allow for a 5 percent growth rate in the population until reaching carrying capacity in the 2000's.<sup>11</sup> With harvest levels more than double the original modeled rate, the population is expected to be nearing carrying capacity now.

We strongly encourage the department to prioritize obtaining density estimates for cougars in all 6 management zones to compare with the expected number projected by the model, in order to validate the model and adjust accordingly. We also encourage the department focus on assessing mortality rates, particularly for kittens younger than three months. Research on kitten mortality in Oregon has only assessed the survival rates of kittens older than three months, for an estimate of about a two thirds rate of survival to one year of age.<sup>12</sup> The return of wolves to Oregon, also presents potential changes to cougar mortality and ecology in the state. Wolves can predate entire litters of cougar kittens, increasing mortality and reducing recruitment.<sup>13</sup> Wolves may also increase competition with cougars for prey, that could reduce the cougar population's carrying capacity in Oregon. We strongly encourage the department to prioritize these research questions in order to provide the most responsible management of cougars possible.

### **3. Implement a season closure from June to November to reduce kitten orphaning**

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<sup>10</sup> Broman, Derek. Oregon cougar management plan. 2022. Presentation. Oregon Department of Fish and Wildlife

<sup>11</sup> Keister, G. P., Jr. and Van Dyke, W. A. 2002. A predictive population model for cougars in Oregon. Oregon Department of Fish and Wildlife.

<sup>12</sup> Clark, D. A., Johnson, B. K., Jackson, D. H., Henjum, M., Findholt, S. L., Akenson, J. J., & Anthony, R. G. 2014. Survival rates of cougars in Oregon from 1989 to 2011: A retrospective analysis. *The Journal of Wildlife Management*, 78(5), 779–790.

<sup>13</sup> Elbroch, L. M., Ferguson, J. M., Quigley, H., Craighead, D., Thompson, D. J., & Wittmer, H. U. 2020. Reintroduced wolves and hunting limit the abundance of a subordinate apex predator in a multi-use landscape. *Proceedings of the Royal Society. B, Biological Sciences*, 287(1938).

rates (anthropogenic and natural) exceed 20 percent of the resident adult female population, the population is likely to experience a lack of stability and decline.<sup>16</sup>

Additionally, Stoner et al (2006) found that the killing of more than 30 percent of the adult population—with 42 percent killed being adult females—led to reduced density and fecundity and skewed the age structure of the cougar population to be younger.<sup>17</sup> Skewing the age structure low can result in a higher saturation of young cougars that are more likely to prey upon livestock and pets from a lack of experience.<sup>18</sup>

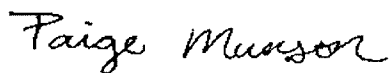
Due to their importance to the cougar population many agencies have implemented female sub-limits within the total hunt quota. We recommend the implementation of a female sub-limit of 20 percent of the hunt quota for the season, to help maintain stable cougar populations.

In review, we ask the Department to address the items listed below and outlined in this letter reviewing the 2023 Big Game Regulations:

- 1. Reduce the cougar mortality quota to 12 percent of the adult population**
- 2. Prioritize research to help validate the current population model for cougars**
- 3. Implement a season closure from June to November to reduce kitten orphaning**
- 4. Implement a female sub-quota of 20 percent to ensure population stability**

Thank you for your consideration of our recommendations for making changes to the *Chapter 635: Big Game Controlled Hunt Numbers, Season Dates, and Regulations*.<sup>1</sup> Please include these comments as part of the official record regarding this decision

Sincerely,



Paige Munson  
**State Policy Associate, Field Biologist**

(916) 442-2666 ext. 104  
pmunson@mountainlion.org



Josh Rosenau  
**Conservation Advocate, Region 1**

(916) 442-2666 ext. 107  
jrosenau@mountainlion.org

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<sup>17</sup> Stoner, D. C., M.L. Wolfe, D. M. 2006. Choate. Cougar exploitation levels in Utah: Implications for demographic structure, population recovery, and metapopulation dynamics. *Journal of Wildlife Management* 70(6): 1588-1600.

<sup>18</sup> Dellinger, J. A., K. K. Macon, J. L. Rudd, D. L. Clifford, S. G. Torres. 2021. *Temporal trends and drivers of mountain lion depredation in California, USA*. *Human Wildlife Interactions* 15(1): 162-177.

## **WRIGHT Amanda L \* ODFW**

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**From:** COMMISSION ODFW \* ODFW  
**Sent:** Thursday, September 15, 2022 2:23 PM  
**To:** WRIGHT Amanda L \* ODFW  
**Subject:** FW: Camp Creek Travel Management Area

**From:** JEFF SENGER <jmsenger.51@comcast.net>  
**Sent:** Wednesday, September 14, 2022 11:31 AM  
**To:** COMMISSION ODFW \* ODFW <ODFW.COMMISSION@odfw.oregon.gov>  
**Subject:** Camp Creek Travel Management Area

I am opposed with the proposed changes being considered for the Camp Creek Travel Management Area. I am a disabled Veteran with both ankles broken, who has been Archery hunting this area for over twenty years with my hunting partner. We both have ridden ATV's in this area since 2000, we obey all the rules and regulations for such use and are very mindful of others that we encounter. A consideration being proposed is to add a couple of access roads to allow partial access into the area. This is a large area for anyone to retrieve a legally harvested animal from, especially when you have a Archery season like the one this year with unusually hot weather for three or four days in a row. It would be exceptionally hard for me to get a legally harvested animal out of the areas you find these animals. They typically aren't found in areas that make it conducive to the tail gate of a pickup.

To add to my concerns with the commission's decision making process, the commission changed the Archery season regulations. Now instead of being able to Buy my Archery tag for the entire season starting August 27th, hunt for 10 days in the Northside unit. Return home and continue the rest of the season hunting Blackmail's on the coast, and the option of a late season hunt. I loose half of my hunting season. Along with that someone at ODFW decided to do away with the Master Hunter program that I was part of. So hopefully you can see that from my point of view, it seems as if though the people at ODFW would be (like most hunters think) just as happy if we went somewhere else to hunt. After all hunters contribute just a little to your budget, as well as being the leaders of the ongoing conservation efforts in Oregon.

Thank you for almost all your efforts if you have ant questions please call me.  
Jeff Senger  
(503) 701-6946