

# **Exhibit E**

**Supplemental  
Public Correspondence received as of  
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## Roxann B Borisch

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**From:** Gregory Green <ggreen@owridgenrc.com>  
**Sent:** Tuesday, June 5, 2018 9:53 AM  
**To:** odfw.commission@state.or.us; roxann.b.borisch@state.or.us  
**Subject:** Red Fox Public Comment - June 2018 Commissioner's Meeting

Commissioners,

I would like to take this opportunity to provide testimony regarding rule changes involving the status of the red fox (*Vulpes vulpes*) in Oregon. I am the principal investigator for the eastern Oregon red fox genetic studies, and the lead author on the recently published "Genetic Characteristics of Red Fox in Northeastern Oregon" (*Northwest Naturalist* 98:73-81, 2017). I was born and raised in eastern Oregon, and began my 40-year career as a wildlife biologist on the Umatilla and Wallowa-Whitman National Forests in the 1970s. During the first third of my career I was involved in multiple projects across the Blue and Wallowa Mountains, and the Columbia Basin, which has given me a historical understanding of the wildlife of eastern Oregon.

Approximately 15 years ago I had the opportunity to co-author the preparation of the Conservation Assessment for the Sierra Nevada red fox (*V. v. necator*) in California (Perrine *et al.* 2010, USDA R5-FR-010), and came away with a clear understand of what makes the native mountain foxes of the west, including the Cascades red fox (*V. v. cascadenis*) and Rocky Mountain red fox (*V. v. macroura*), unique from other fox populations in North America. In the meantime, colleagues in eastern Oregon were asking me of my opinion of the expanding red fox population there. During subsequent visits I noticed that local foxes in Union and Wallowa counties exhibited phenotypes characteristic of native mountain foxes. In general, these foxes were a pale yellow color when in the "red" phase. In my discussions with a number of colleagues, because these foxes did not exhibit the color characteristics of a "typical" red fox, it was often assumed that they were not native, but originated from fur farm releases. This view was reinforced by Mace's (1970) Oregon's Furbearing Animals publication stating that the native foxes in Oregon were extirpated, and current fox populations are descendants from eastern transplants. The Oregon Conservation Strategy later picked up on this view and listed the red fox as a non-native invasive species in the Blue Mountains province.

In 2011, Leonard Erickson (District Biologist at La Grande) and I decided to begin collecting fox DNA from his district taking advantage of a collaboration we already had with Dr. Ben Sacks' wildlife genetics laboratory at the University of California, Davis. I subsequently expanded the collection to throughout eastern Oregon. The study objectives were simply to determine the genetic affinity of eastern Oregon red foxes. Were they native Rocky Mountain red foxes, or not?

After several years of collection, both our mitochondrial DNA results (published in Green *et al.* 2017) and our nuclear DNA results (unpublished) indicate that virtually all fox samples collected within the original red fox range as described by Vernon Bailey (1936) are of native ancestry. Many of these fox populations appear to have originated from an extant population in the Wallowa Mountains, a contention we are currently in the process of verifying based on 2017 DNA collection and pending nuclear DNA analysis.

Non-native foxes do occur in eastern Oregon, but the only evidence found to date are foxes originating from an intentional fur farm release near Hermiston that occurred in the 1980s. These foxes, with Alaskan haplotypes characteristic of fur farm foxes, persist within a few miles of the release site, and have interbred with native foxes elsewhere in the Columbia Basin. Still, native foxes dominate the populations in eastern Oregon within and outside original range.

The genetic evidence also strongly suggests a general down-slope movement of these native foxes typically found at higher elevations. We attribute this movement to the lower elevation irrigation projects which have created and expanded habitat for voles, a primary prey source for these foxes.

Changing the status of these foxes from a non-native invasive species to a native furbearer recognizes the legacy of this species in Oregon. Hundreds of red fox pelts were traded by local Native Americans at Fort Nez Perce at the mouth of the Walla Walla River, with most would have been taken in present day eastern Oregon based on trade patterns at the time. It also places the species in a management trajectory not towards elimination, but towards conservation. Also, by managing the fox as a native furbearer, with recognized harvest seasons, may actually enhance the current trapping opportunity for this species. As a game animal, taking of the animals outside the harvest season would be prohibited except in damage complaint situations.

Based on our research, and a similar ODFW-sponsored genetics study on Sierra Nevada red foxes in the Cascades (Quinn et al. 2017), clarifying the native status of red foxes in Oregon, I encourage the Commissioners to adopt the proposal to change the status of the red fox to a native furbearer.

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