



# Oregon

Kate Brown, Governor

## Department of Fish and Wildlife

Deschutes Watershed District

East Region

61374 Parrell Road

Bend, Oregon 97702

(541) 388-6363

FAX (541) 388-6281



November 20, 2015

ATTN: Deschutes Rulemaking  
Oregon Parks and Recreation Department  
725 Summer St. NE  
Suite C  
Salem, OR 97301

RE: Amendment of rules for the Upper Deschutes State Scenic Waterway (OAR 736-040-0073)

The Bend Parks and Recreation Department has requested amendment of the Oregon State Scenic Waterway rules (OAR 736-040-0073) to allow construction of bicycle and/or pedestrian bridges between Deschutes River Mile 174.6 and 172.

The Oregon Department of Fish & Wildlife (Department) is mandated by State Statute to manage fish and wildlife resources to prevent serious depletion of indigenous species and to provide optimum recreational and aesthetic benefits for present and future generations of the citizens of Oregon (ORS 496.012). Generally, the Department supports public enjoyment of the State's natural resources. However, this amendment has the potential to increase public use of areas that have been designated as important to the conservation of wildlife. Much of the area on the west side of the River between River Miles 174.6 and 172 is part of a U.S. Forest Service Key Elk Management Area as described in the Deschutes National Forest Land and Resource Management Plan (1990). In addition, according to the Deschutes County Comprehensive plan, the west side of the river is part of the Statewide Goal 5 Tumalo Deer Winter Range. These areas are managed to reduce disturbance to deer and elk during winter when they are particularly vulnerable due to colder temperatures and lack of food resources.

Several recent studies have revealed that recreational activities can be a significant source of disturbance to wildlife. Human presence with and without companion animals (typically dogs) has been shown to alter wildlife behavior in the form of increased vigilance and energy expenditure (Miller et al. 2001, Lenth et al. 2008, Naylor et al. 2009, Vandeman 2014).

For these reasons, the Department recommends that the Oregon Parks and Recreation Board Commission reject the proposed amendment of OAR 736-040-0073.

Thank you for the opportunity to comment. If you have questions or want information that the Department can provide, please contact me.

Sincerely,

A handwritten signature in cursive script that reads "Sara Gregory". The signature is written in black ink on a white background.

Sara Gregory  
Wildlife Habitat Biologist  
Deschutes Watershed District  
[sara.c.gregory@state.or.us](mailto:sara.c.gregory@state.or.us)  
541-633-1113

cc: Corey Heath, Deschutes District Wildlife Biologist

References:

1. Miller, Scott G., Richard L. Knight, and Clinton K. Miller. "Wildlife responses to pedestrians and dogs." *Wildlife Society Bulletin* (2001): 124-132.
2. Lenth, Benjamin E., Richard L. Knight, and Mark E. Brennan. "The effects of dogs on wildlife communities." *Natural Areas Journal* 28, no. 3 (2008): 218-227.
3. Naylor, Leslie M., Michael J. Wisdom, and Robert G. Anthony. "Behavioral responses of North American elk to recreational activity." *The Journal of Wildlife Management* 73, no. 3 (2009): 328-338.
4. Vandeman, Michael J. "The Impacts of Mountain Biking on Wildlife and People--A Review of the Literature." In *Society for Conservation Biology meeting*, Columbia University, New York, NY. 2004.