Exhibit E

Public correspondence received as of May 27, 2020
May 27, 2020

Chairman Wahl, ODFW Commissioners and Director Melcher,

As President of The Lincoln County Chapter of the Oregon Hunters’ Association I would like to take a minute to express our opposition to the petitioned changes to the 2020 Fur Taker regulations (OAR 635-050-0070)

We, at OHA, support Oregon Department of Fish and Wildlife’s sound science and data-collection methods utilized to recommend and advise on Oregon policy. At this point it appears the data is unclear that the proposals would have the intended outcomes supporting fish habitat and beaver populations. Furthermore, there appears to be no demonstrated need for the suggested changes.

In areas where beaver trapping bans exist, there is no demonstrated benefit to local beaver populations (Wallowa County). Scientific data simply doesn’t support this request. Where the request sounds like a win/win (protect the beaver and help the fish), the issue is really much more difficult and the possibility of creating unintended consequences exists. There is a wealth of scientific data provided by the trapping community through mandatory reporting, as well as other data provided by ODFW that should be utilized and considered when making policy changes with such a broad impact. Further research and data collection is needed to make any correlations regarding the well-being of beaver population and fish habitat.

At this point ODFW (both wildlife and fish divisions) have not recommended any major changes to the regulations and does not support these ban requests. If there were an urgent need for protection for, ODFW would obviously bring those concerns to the Commission.

OHA Lincoln County requested that you consider these changes carefully, and use established scientific method and data driven research when considering such a change.

Sincerely,

S. Todd Williver
President, Lincoln County Chapter
Oregon Hunters’ Association
I'm an Oregonian who joins a long list of scientists, wildlife managers, and citizens requesting a ban on commercial and recreational beaver trapping and hunting. For many reasons, this valuable and important species needs to be protected.

Thank you,

Lynne Reardon
Rogue River, Oregon
To the wildlife commission of the state of Oregon:
By now I am sure you have received numerous emails in reference to the proposed closing of the Siuslaw National Forest to beaver trapping, both in favor of the closure and against it. I am certain that many against the closure have simply complained about the slow but sure diminishment of trapping privileges in the state of Oregon and nationwide. I am aware that the proposed closure is intended to protect beaver populations in the forest with the idea that beaver dams create rearing habitat for coho smolts. While this is true in respect to beaver dams, I would posit that the lack of dams in the designated area is not due to trappers but natural predation by cougar, bear, and coyotes. AND the EXTREME loss of suitable habitat brought about by modern forest practices. I started beaver trapping in western Oregon in the mid 70's and paid for my college education in wildlife management by trapping while attending college at Oregon State University. I did at that time trap the high country in the coast range, and there was a large population of beaver in most streams that had a level enough gradient to allow beaver to build a dam. Logging practices at the time allowed timber harvest up to creek edges. Salmon populations were high but there was concern that the logging practices of the day were causing siltation and was detrimental to spawning success. Green belts were established to prevent erosion into the creeks. This was successful BUT as the green belts grew taller they produced an overstory that shaded the creek banks and prevented the necessary hardwood brush from growing or reestablishing itself. This hardwood brush is absolutely necessary for any viable beaver habitat. Over the years of my trapping career I witnessed a drastic drop in beaver colonies in the high coast range due to habitat loss, NOT trapping. People have an extremely high emotional response to trapping activities, but it is your responsibility as commissioners to adopt policy and regulations based on demonstrated science and principles of wildlife management. Also, beaver prices have been at all time lows for several years now and there is no indication that will change anytime in the near future. Beaver are the most labor intensive fur animal that can be harvested and there simply is very little effort being put forth by trappers to pursue beaver at this time. When I started trapping, one beaver equaled two days wages at minimum wage, today it takes close to ten beaver to equal one days wage at minimum wage. It does not make economic sense to pursue beaver in the high country at this time. If you truly want to protect and enhance beaver populations in the Siuslaw National Forest, I suggest extreme measures be taken to improve habitat, not exclude a specific user group because of an emotional response! The science simply does not back up this proposed solution to a beaver/salmon problem that did not exist when beaver prices were at all time highs!
Thank you,
Charles Carnahan
PO Box 597
Coquille, OR 97423
Oregon trap brand number 7677
nh114@juno.com
(541)260-3666
Roxann B Borisch

From: Brad Mombert <bmombert@lblm.net>
Sent: Wednesday, May 27, 2020 11:39 AM
To: odfw.commission@state.or.us
Subject: Letter in opposition of Trapping Closure
Attachments: support Trapping letter.docx

Please see the attached letter on behalf of the Oregon United Sporting Dog Association.

Thanks,

Brad Mombert
Manager
LBLM Investments, LLC
60720 Tekampe Rd.
Bend, OR 97702
541-410-9619
bmombert@lblm.net

I am using the Free version of SPAMfighter.
SPAMfighter has removed 341 of my spam emails to date.

Do you have a slow PC? Try a free scan!
ODFW Commission,

We were recently made aware of a petition to stop all beaver trapping in the Siuslaw National Forest. We are standing with the Oregon Trappers Association in opposition to this petition and any others that should limit trapping opportunities in Oregon. Trapping is an important management tool to keep numbers of animals in check and has been a tradition in Oregon going back to our foundation. We understand there are already a number of closures for Beaver trapping and there is no proof in the form of Study findings that would support that the closures achieve the intended benefit. These closures date back to the 1950’s.

This petition is yet another step to limit the recreational opportunities of Oregonian’s by a small part of its population. Please stop the damage these people are trying to make to our Oregon Traditions.

Again, our Membership is strongly opposed to this ban and we urge you as supporters of the ODFW economy and as supporters of Oregon Traditions to put a stop to this closure.

Sincerely,

Oregon United Sporting Dog Association

David Walker, President

Buddy Woodberry, Vice President

Brad Mombert, Treasurer
Oregon Fish and Wildlife Commission,

My name is Scott Wood and I have lived in the head waters of a Siuslaw river tributary for over 60 years. Since the 1960's their has been many rules and regulations put in the books all with good intentions but unfortunately with less than stellar results. For every action there is a reaction with case in point, In the early 1960's the Oregon Department of Fish and Wildlife working with the Oregon Department of Forestry required the timber harvesters to remove the log jams in the upper Siuslaw river systems so in theory making easier access for the Salmon to make it to there spawning grounds. I recall supper table talk when the fathers of my community came home from work and shared stories of the salmon coming up on the tracks of the bulldozers as they made there way up and down the river removing those log jams. That first winter as the rains came it washed the sand and pea gravel the necessary components for spawning to tide water exposing the spawning habitat to bed rock.

As a young man having to comply first hand to the "Buffer strip" laws of the 90's that left standing trees in the streams that now have grown quite large choking out the sunlight so there is limited food source for the beaver and now they have to go outside that forest leave area to gather required food only to be overcome by predators such as the cougar which we can no longer manage properly because of misguided regulations.

Fast forward to the last two decades as the Oregon Department of Fish and Wildlife has tried to correct there poor management advice they have again tried to rebuild spawning habitat with universal rock dams the full length of the upper river system. So what happens? The second week in November as for centuries the rains come to the central Oregon coast and the salmon start their journey to the spawning grounds making there way over these stair stepped dams only to have the rain take a short break for a few days allowing the river levels to drop snagging the salmon in between these rock formations which in turn allowing the otters to come in and have a blood bath literally killing fish in a barrel as the saying goes.

Yes, the beaver habitat in the upper tributaries of the Siuslaw is in trouble and those timber harvest regulations need changed but the beaver have moved and have adapted mainly in the lower parts of the river but banning trapping is not the answer. By banning beaver trapping you also are banning otter trapping the two go hand in hand with no recourse to keep the otter in check the imperil salmon have just acquired another notch in their back.

That Commissioners are life facts that bring us to where we are today and I haven't even addressed the access issue. Over the last four decades the Bureau of Land Management (BLM) which manages every other section of public land along with the main private timber company of the area have developed a partnership that involves gating up blocks of land in fact over a hundred square miles of which the Wolf Creek drainage of the Siuslaw river is 75 square miles of those public lands alone. With these public lands gated where are the recreational opportunities?

With no opportunities both in access and with regulation is this historical knowledge that has been past on to us by our forefathers going extinct?

That will be a sad day and you hold the gavel.....

Sincerely,
Scott L. Wood
24158 Wolf Creek Road
Veneta, Oregon 97487
541-935-7713
Regarding consideration of proposed rules for hunting and trapping “forbearing” animals.

I oppose trapping in Oregon. It causes considerable pain and suffering for animals. This can’t be justified under any circumstances - and is certainly not justified by any economic necessities.

At the bare minimum, Oregon should join other states in requiring checking of traps daily.

Thank you!
Dana Brown

Dana L Brown Consulting
Services to assist you in strengthening your organization
www.danalbrownconsulting.com
(503) 284-4405
danaconsulting@comcast.net
She/her pronouns
May 27, 2020

Chair Wahl, Director Melcher, members of the Commission,

Thank you for the opportunity to provide comment on request to amend OAR 635-050-0070. By way of background, the Oregon Farm Bureau is the state’s largest agricultural trade association, representing nearly 7,000 farm and ranch families across the state. As longtime stewards of the land, Oregon’s farmers and ranchers understand the complexities of managing Oregon’s varied landscapes and coexistent species. However, the actions requested by the Petitioners are not supported by best available science or data, and there is no demonstrated need for the suggested changes to the furbearer regulations. As such, the Commission should not adopt these suggested rule changes.

The Oregon Department of Fish and Wildlife has always relied on sound science and data to drive its policy making, and this should not change now. There is no credible data or science supporting the assertion that banning trapping significantly drives beaver populations and population increases. There is also no credible data showing that in places where beaver trapping bans exist, beaver populations increased in a way that caused meaningful or quantifiable riparian restoration. The concept that banning trapping would allow numbers to increase and would restore ecosystems statewide is entirely conjectural, and not rooted in reliable science. This is why ODFW staff has not recommended any major changes to the furbearer regulations and does not support these ban requests.

Trapping is a proven and effective tool in the management of wildlife. The Commission should not adopt significant changes to this management practice without demonstrated research and scientific evidence that is understood and supported by agency staff. Moreover, before any changes to management practices are made, legitimate research and scientific analysis should be conducted to understand beaver populations, habitat, predation, and overall species health.

Therefore, OFB urges the commission to deny petitioned to amend OAR 635-050-0070 as it pertains to where beavers may be trapped within the state.

Samantha Bayer  
Policy Counsel | Oregon Farm Bureau  
samantha@oregonfb.org
Dear ODFW,

I would like to add my voice to the chorus of Oregonians opposed to beaver trapping. This is an archaic and cruel practice that does not benefit native forest and stream habitats. Beavers are our state animal, and they need to be protected.

Thanks
Joseph Flaherty
O’Brien OR
Dear Commissioners,

I would like to add my support to the ban on beaver trapping in federal and state land in Oregon. As a food business professor and researcher on impacts of natural systems on communities, I see the beaver as an important contributor to maintaining a healthy water and food-shed. Clearly, current evidence shows that beaver activities improve fish and wildlife habitats (and overall biodiversity), captures and stores more carbon, and helps with drought and flooding impacts by improving water storage and contributing to slower run-off. Rather than pay for expensive human-made systems that exacerbate these problems and increase our taxes, why not let the beavers and natural systems do this work for free? Having observed the success that US regions and other parts of the world have had with reintroducing beavers or allowing them to exist, I am convinced that it's important to keep beavers in our ecosystems.

Regards,
Professor Madeleine Pullman
64165 Williamson Rd.
Enterprise, Oregon 97828

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Web | Facebook | Twitter | YouTube | LinkedIn | Instagram | Pinterest
Roxann B Borisch

From: Jacqueline Strenio <jacquelineastrenio@gmail.com>
Sent: Tuesday, May 26, 2020 6:49 PM
To: odfw.commission@state.or.us
Subject: Comments on ban on commercial and recreational beaver trapping and hunting on federally-managed public lands

Dear ODFW Commissioners,

I'd like to express my support for the ban on commercial and recreational beaver trapping and hunting on federally-managed public lands as a resident of Jackson County, Oregon.

This is important to me because beavers bring many benefits to federally-managed lands. For example, beaver-created improvements can lead to better fish and wildlife habitats for many of the wonderful (and economically important) species we have here in Oregon, including salmon. Beavers also help create wildfire safe zones for wildlife and livestock.

I hope you will consider this ban to close these lands to commercial and recreational beaver trapping and hunting.

Thank you for your time and consideration.

Warm regards,
Jacki

--
Jacqueline Strenio, PhD
Assistant Professor, Economics
Southern Oregon University
541-552-6650
Pronouns: she/her/hers
Dear commissioners,

This e-mail is being written to oppose any trapping restrictions on Beaver within public lands in Oregon and to oppose any new trapping regulations. I am a trapper in Tillamook and Grant Counties and I spend a fair amount of time trapping beaver off of private lands causing damage to dairy land. But my travels take me through public lands throughout Oregon where I constantly look for and find sign of beaver. I have found that if it is beaver habitat, then beaver will be there.

Those who will say we do not have enough beaver in Oregon have not looked for beaver sign or they are clearly looking at habitat that is not suitable for beaver. Most people are looking for dams and beaver huts like those they have seen on tv. But I have found that most beavers I find have burrowed into the river banks and you have to look for tree trimmings, slides, castor mounds, etc.....

A beaver is an incredible animal that has to be managed. Sport trapping plays an important role in this management and any restrictions should be based off sound biological science not social disapproval’s or misinterpretation of habitat.

I want to thank you for allowing me the opportunity to comment on this subject as trappers are as concerned about wildlife health as much as anyone.

Sent from my iPhone
Dear commissioners,

This e-mail is being written to oppose any trapping restrictions on Beaver within public lands in Oregon and to oppose any new trapping regulations. I am a trapper in Tillamook and Grant Counties and I spend a fair amount of time trapping beaver off of private lands causing damage to dairy land. But my travels take me through public lands throughout Oregon where I constantly look for and find sign of beaver. I have found that if it is beaver habitat, then beaver will be there.

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A beaver is an incredible animal that has to be managed. Sport trapping plays an important role in this management and any restrictions should be based off sound biological science not social disapproval’s or misinterpretation of habitat.

I want to thank you for allowing me the opportunity to comment on this subject as trappers are as concerned about wildlife health as much as anyone.

Sincerely,

Todd Hoodenply
Monument, Oregon
hoody.family@yahoo.com

Sent from my iPad
Email tonight please

Odfw.commission@state.or.us

Beaver trapping restrictions

Dear commissioners,

This e-mail is being written to oppose any trapping restrictions on Beaver within public lands in Oregon and to oppose any new trapping regulations. I am a trapper in Tillamook and Grant Counties and I spend a fair amount of time trapping beaver off of private lands causing damage to dairy land. But my travels take me through public lands throughout Oregon where I constantly look for and find sign of beaver. I have found that if it is beaver habitat, then beaver will be there.

Those who will say we do not have enough beaver in Oregon have not looked for beaver sign or they are clearly looking at habitat that is not suitable for beaver. Most people are looking for dams and beaver huts like those they have seen on tv. But I have found that most beavers I find have burrowed into the river banks and you have to look for tree trimmings, slides, castor mounds, etc.....

A beaver is an incredible animal that has to be managed. Sport trapping plays an important role in this management and any restrictions should be based off sound biological science not social disapproval's or misinterpretation of habitat.

I want to thank you for allowing me the opportunity to comment on this subject as trappers are as concerned about wildlife health as much as anyone.
Dear Oregon Fish and Wildlife Commission,

I am writing as a concerned Oregon resident to urge you to ban commercial and recreational beaver trapping and hunting on federally managed public land in Oregon. I am aware of the request submitted to you yesterday by a group of citizens, wildlife and fishery biologists, and hydrologists to close all National Forests, Bureau of Land Management lands, National Monuments, Federal Wildlife Refuges, National Parks, and National Grasslands in the state of Oregon to commercial and recreational beaver trapping and hunting. I wholeheartedly agree and am writing in support of this request.

Beavers are vital to maintaining and improving watersheds, water quality, streams, wildlife diversity and health, fish, water storage (and thus agricultural irrigation), and availability of water for human consumption. The benefit of beavers includes:

- New and better fish and wildlife habitat for many species, including salmon.
- Expanded wetlands, wet meadows and increased riparian vegetation will capture and store more carbon;
- Better groundwater storage and slower run-off will help alleviate municipal and agricultural water scarcity and lessen flooding, especially important due to climate change. This will benefit both urban and rural populations.
- Beaver will create wildfire safe zones for wildlife and livestock on these public lands and wetter lands will quicken vegetative recovery after fire.
- Fishing, hunting and wildlife watching opportunities will improve with increased biodiversity and wildlife abundance.

There are non-lethal ways to remove beavers from specific areas when needed, and those methods should be prioritized above all else, and trapping and hunting should be banned.

Sincerely,

Suzie Savoie
Applegate Valley, Oregon
I support a ban on commercial and recreational beaver hunting/trapping on public lands. Beavers provide important, and free, ecological services that improve fish habitat. Beaver populations are a small remnant of the historic number in Oregon. Let's give the beavers a break please.

George Sexton
PO Box 240
Talent, OR 97520
Hello Chair Wahl and Commissioners,

Please find attached my letter requesting support for an amendment to OAR 635-050-0070.

Thank you,

Pam

Representative Pam Marsh
Oregon House District 5 - Southern Jackson County
Email: Rep.PamMarsh@oregonlegislature.gov
E-subscribe: oregonlegislature.gov/marsh
Office: (503) 986-1405
May 26, 2020

Chair Mary Wahl
Oregon Fish and Wildlife Commission
4034 Fairview Industrial Drive SE
Salem, OR 97302

Re: Request to Amend OAR 635-050-0070

Dear Chair Wahl and Members of the Commission,

I am writing to ask for your support of an amendment to OAR 635-050-0070 that would close commercial and recreational beaver trapping and hunting on federally managed public lands in Oregon. Here in the Beaver State, it is time to take actions necessary to enable these animals to provide the numerous, invaluable ecosystem benefits they are naturally designed to do.

As you likely already know, beaver enhance fish and wildlife habitat. Beaver create complex habitat through their ponds, bank lodges and woody inputs into streams, which improves rearing grounds for coho and other endangered salmonid stocks in Oregon, as well as decreases stream temperatures. Ponds, and the resulting wetlands and wet meadows, provide food sources, and resting and rearing areas for migratory birds, including threatened and declining species like the Willow Flycatcher, Song Sparrow and Yellow-breasted Chat.

Beaver also aid people in a variety of ways. Dams and ponds increase temporary surface water and groundwater in the headwaters, slowing the rate at which water is released. This temporary storage can offset the impacts of drought and decrease the frequency and magnitude of downstream flooding. Cooler stream temperatures and less sediment lead to improved water quality; much of Oregonians’ drinking water comes from national forests, and all of our public lands contribute to the waters used for ranching and agriculture.

Here in Southern Oregon, wildfire and climate change are two issues that are already impacting my constituents, as well as local wildlife and livestock. Beavers’ ability to increase the abundance and distribution of wetlands and wet meadows creates safe zones where animals can shelter during wildfire. Post-fire, these wet areas help to maintain downstream water quality by trapping sediment and preventing erosion, and they enable forage and habitat to recover more quickly.

Beavers are our allies in climate mitigation. Wetlands and wet meadows extract carbon from the air and store it in roots, in decaying matter below ground, and in riparian vegetation above ground. Beaver ponds also capture carbon when dead vegetation is submerged under water. This natural process of carbon storage directly addresses climate change and is currently an underutilized response strategy.
Your approval of this amendment addresses all four goals of the Governor’s 100-Year Water Vision: 
*Health*—clean water for all who live in Oregon; *economy*—sustainable and clean water to support local 
economic vitality; *Environment*—adequate cool, clean water to sustain Oregon’s ecosystems for healthy 
fish and wildlife; and *Safety*—water supplies and flood protection systems for Oregon’s communities.

The rule change also aligns with the seven Key Conservation Issues in the Oregon Conservation Strategy, 
plus four Strategy Habitats and the habitat needs of 82/294 strategy species.

This amendment is congruent with ODFW’s mission statement, and it brings policy for management of 
beavers on federally managed lands into compliance with best available science, at little to no cost to 
taxpayers. It applies only to commercial and recreational harvests on federal lands and does not 
eliminate any options for state or federal land managers or private landowners to manage beavers. It 
simultaneously creates opportunities to demonstrate effective non-lethal solutions to beaver-human 
infrastructure conflicts in publicly accessible sites, without financial risk to private landowners or state, 
county or city land managers.

Despite the fact that drought, wildfire, flooding, and water are statewide concerns, existing regulations 
limit beaver-related benefits to very few places in the state. There is no doubt that beavers benefit 
whole ecosystems, including humans, at a statewide and landscape scale—and they do it better, faster, 
and cheaper.

Thank you for giving your consideration to this change in Oregon’s furbearer trapping and hunting 
regulations. I strongly encourage your approval of this amendment.

Best regards,

Pam Marsh

Representative House District 05
Southern Jackson County

Capitol Address: 900 Court St NE, H-375, Salem, OR 97301 – Phone: (503) 986-1405
rep.pammarsh@oregonlegislature.gov – www.oregonlegislature.gov/marsh
Dear ODFW Commissioners,

I am writing to very strongly ask that you act to end the horrific and failed practices of allowing trapping of beavers. By now you are aware that beavers are an important keystone species that restores damaged aquatic habitat and makes new aquatic habitat, all without spending a penny of taxpayer money.

Please take action for aquatics, fish and beavers by ending the needless killing of these amazing beings.

Sincerely,

Spencer Lennard
Hello, I am a citizen of Oregon. I am writing to request a ban on commercial and recreational beaver trapping. Beavers are vital to the ecosystem, please help ensure this practice stops.

Thank you,
Brandy MacDonald
Ashland, OR
I support a ban on killing beavers in Oregon! Please consider how important these keystone species are for the health of our wildlife habitats on public lands!.....

New and better fish and wildlife habitat for many species including salmon. Expanded wetlands, wet meadows and increased riparian vegetation will capture and store more carbon; Better groundwater storage and slower run-off will help alleviate municipal and agricultural water scarcity and lessen flooding, especially important due to climate change. This will benefit both urban and rural populations. Beaver will create wildfire safe zones for wildlife and livestock on these public lands and wetter lands will quicken vegetative recovery after fire. Fishing, hunting and wildlife watching opportunities will improve with increased biodiversity and wildlife abundance.

Banning commercial and recreational furtake on federally-managed public lands will have little effect on the hunting/trapping community or land management tools:

Commercial and recreational take of beaver statewide occurs on both public and private lands. Commercial take amounts to less than 5% of the total sales of fur and other wildlife products. Since this Amendment applies to federally-managed public lands only, the effect on furtaker income will be insignificant. The number of beaver trappers and hunters have been falling for years, with only 161 reported in 2016. There are proven nonlethal solutions to beaver-caused problems and organizations devoted to helping land mangers use them. Federal public land managers will still be able to lethally control beaver as a last resort (hopefully they will first try nonlethal).

--
Alex Lamoreaux
717-943-7086
Senior Leader/North America Specialist for Wildside Nature Tours
https://wildsidenaturetours.com/team-member/alex-lamoreaux/
Beaver’s are an important contributor to a robust water cycle. They provide many services including holding spring run-off back for summer flow and providing wet habitat for a whole myriad of species. Please support the ban on beaver trapping. They are much more valuable in the watershed than as a pelt on the market.

Dianne Keller
819 Garden Way
Ashland, OR. 975209
I would like to hereby express my most strenuous objection to any additional or further restrictions in regards to trapping on public land. I feel the commissioner has been given erroneous information regarding the impact of trapping beaver in state and national forests. Further restrictions are not needed!

Don Taylor
Hello,

This letter is written regarding the proposed closure of the Siuslaw national forest for beaver trapping.

There are currently at least 15 national forests and other large area closures within Oregon. Which in sum total amounts to over 730 years of closure. 500 of those years being in national forest. There is very little to show for the closures in terms of data collection or improvement to beaver habitat.

Another closure would seem to be simply a way to slowly choke out the trapping community.

Trapping contributes to conservation efforts through both revenue and animal population control. Shutting down another area for trappers, based on the current closure data, will help with neither.

Please do not chose to further limit the trapping opportunities here in our great state.

Thank you,

Kyle
Roxann B Borisch

From: Kyle Williams <kyle@ofic.com>
Sent: Tuesday, May 26, 2020 5:00 PM
To: odfw.commission@state.or.us
Cc: Derek J Broman; ’Kevin Blakely’; douglas.f.cottam@state.or.us
Subject: Regarding changes to 20-22’ Furbearer regulations
Attachments: OFIC_OSWA comments on proposed changes to Furbearer regulations 2020-22.docx

Dear Chair Wahl,

Please see attached for our input on proposed changes to OAR 635-050-0070.

Thank you for the opportunity to comment.

Kyle Williams
Director of Forest Protection
Oregon Forest & Industries Council
O: 503-586-1244 | C: 541-207-4547 | ofic.com

🔗LinkedIn🔗 Twitter🔗 Instagram
May 26, 2020

Chair Wahl, Director Melcher and members of the Commission,

My name is Kyle Williams and I am the Director of Forest Protection for the Oregon Forest & Industries Council. Together with the Oregon Small Woodlands Association, we would like to thank you for the opportunity to provide comments on proposed changes to the Furbearer regulations for 2020-22.

The Oregon Forest & Industries Council (OFIC) is a trade association representing more than 50 Oregon forestland owners and forest products manufacturers. We protect and manage more than 5 million acres of Oregon forestlands, employ nearly 60,000 Oregonians, and together make Oregon the nation’s largest state producer of softwood and plywood.

The Oregon Small Woodlands Association represents non-industrial forestland owners who own between 10 and 5,000 acres of forestland. Our more than 1,500 members are from local chapters in all parts of the state.

OFIC and OSWMA promote the forest industry’s leading role in delivering environmental and economic benefits while balancing the sustainable use of forest resources. As stewards of these lands whose health and sustainability is critical to our way of life, we rely on the latest science and technology to continuously guide us in improving the environmental, social and economic value of healthy working forests.

Collectively, our forestry community strongly opposes the petitioned requests to amend OAR 635-050-0070 as they pertain to where beavers may be trapped within the state.

The Oregon Department of Fish and Wildlife has long held to high standards of policy making based on strong science. Unfortunately, in this instance, the petitioned requests to ban beaver trapping lack demonstrable evidence to prove their need or alignment with the mission of the Agency. In places where similar bans already exist there is no data to show increases in population or damming behavior tied to the trapping bans. To our knowledge there is no research linking pressure or effectiveness of trapping, to limitations on beaver population.

While we appreciate some of the intended outcomes, we strongly caution against anecdotal species management, specifically in this example the assertion that banning trapping will equate to more beavers, who will create more dams, ergo more Coho. Not to lose sight of the fact there is again, no demonstrable science to prove this concept, what we do know is that beaver thrive in early seral riparian conditions. Most if not all modern forestry regulations and management plans are intended to create exactly the opposite of those conditions in near stream areas. It is very likely that the reason forested watersheds lack historical damming frequency is because habitat conditions have changed. The only thing a trapping ban will accomplish is the further erosion of opportunity to use and enjoy Oregon’s wildlife by present and future generations.
Further, the data that the trapping community provides through their mandatory reporting is well established and invaluable in the management of other species. The broad brush of banning beaver trapping across an entire forest or all public lands would not only miss the mark for conservation of the species but may inadvertently remove a valuable tool for information collection.

We believe the best place for sound science-based management of Oregon's wildlife, both game and non-game species lies within recommendations of the staff at ODFW.

If there were an urgent need for protections for beaver or any other species in Oregon, I am confident that the Agency staff would bring those concerns forward to the Commission. I am also confident that those conditions do not exist for beaver in Oregon, and once again reiterate our strident opposition to the petitioned requests to amend OAR 635-050-0070.

Thank you for your time,

Kyle Williams

Kyle Williams
Director of Forest Protection
Oregon Forest & Industries Council

Jim James

Jim James
Executive Director
Oregon Small Woodlands Association
Hello,

Please see the attached letter from Pacific Forest Trust’s President, Laurie Wayburn.

Thank you,

~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~

Grant Pattison
Executive Coordinator

The Pacific Forest Trust
Working Forests Work Wonders for Us All
1001-A O'Reilly Avenue, San Francisco, CA 94129
Cell: 415.361.3983   f: 415.561.9559
PacificForest.org
Dear Oregon Fish and Wildlife Commission,

When I was a kid, I read a book titled, "Chip, the Dam Builder" and was impressed that God created such magnificent engineers. Beavers are beneficial to the environment, unlike humans who mostly degrade and destroy it. Beavers create marvelous riparian environments, which we need now more than ever to mitigate climate change impacts.

Close federally managed lands in Oregon to commercial and recreational beaver hunting and trapping. Hunters, as part of the most adaptable species, can adjust. Why always put the adaptation burden on other species?

Sincerely,
Christine Hertzog
Portland, OR 97209
chertzog@smartgridlibrary.com
Greetings ODFW,

Please accept this as a public comment in support for the request to ban beaver hunting and trapping in Oregon.

I am a rural Jackson County, OR, resident and living along the current Dead Indian Creek, which once supported beavers. Over the last 80+ years, the once wet meadow has become increasingly dry and the willow along the creek have been removed during previous landowner management. Due to local trapping and habitat degradation, beaver no longer live in this place - a classic story around the West. It is clear that the ecology and hydrology of the meadow have been severely disrupted, as evidenced by the severe incision of the creek, and continual erosion each year. (see picture below) Scientists have long known that beavers are vital to maintaining and improving watersheds, water quality, streams, wildlife diversity and health, fish, water storage (and thus agricultural irrigation), and availability of water for human consumption.

Through my work as Director of the Vesper Meadow Education Program, I collaborate with local organizations / agencies such as the Rogue River Watershed Council, Jackson Co. Soil and Water District, Oregon Dept. of Forestry, Confederated Tribe of the Siletz, Southern Oregon University, The Klamath Bird Observatory, Southern Oregon Land Conservancy, and The Understory Initiative among others, to improve the health of the creek and the land. It is general agreement that beaver were key to maintaining the health of the meadow and that this site, and others locally, would benefit from the role beavers play in maintaining a healthy creek ecosystem.

Thank you for your work to serve all Oregonians and our treasured wildlife. Please do everything in your power to support the request to ban killing and trapping of Beaver.

Sincerely,
Jeanine Moy
16534 Dead Indian Memorial Hwy, Jackson County, Oregon
The upper stretches of Dead Indian Creek, with visible erosion and damage from previous land management practices - Aerial imagery 2019
From: Charlene Parlier <jcpmerrill@airrun.net>
Sent: Tuesday, May 26, 2020 2:35 PM
To: Odfw.commission@state.or.us
Subject: Stopping all beaver trapping would accomplish nothing good for the environment or the economy.
Hello,

I would like to issue my support for the ban on commercial and recreational beaver trapping and hunting on federally managed public lands.

Beavers are a vital part of a healthy watershed and provide many benefits to the ecosystem, including creating habitat for fish spawning, removing toxins from the water, and returning water to the water table.

Beavers provide environmental engineering solutions to habitat problems at no-cost to the taxpayer. Oregon nearly lost all its beavers before; let's not make the same mistake.

Oregon proclaims itself as the Beaver State and it should act accordingly. I strongly urge you to pass the ban on commercial and recreational beaver trapping.

Sincerely,

Nicole Hobbs
AmeriCorps VISTA
Marys River Watershed Council
Nicole@mrwc.org
541-758-7597
Pronouns: She/her/hers
They are the State animal FFS! They should never be trapped, especially on public lands.

Beavers are amazing stewards of the lands in which they live:

- New and better fish and wildlife habitat for many species including salmon.
- Expanded wetlands, wet meadows and increased riparian vegetation will capture and store more carbon;
- Better groundwater storage and slower run-off will help alleviate municipal and agricultural water scarcity and lessen flooding, especially important due to climate change. This will benefit both urban and rural populations.
- Beaver will create wildfire safe zones for wildlife and livestock on these public lands and wetter lands will quicken vegetative recovery after fire.
- Fishing, hunting and wildlife watching opportunities will improve with increased biodiversity and wildlife abundance.
- Banning commercial and recreational furtake on federally-managed public lands will have little effect on the hunting/trapping community or land management tools:
  - Commercial and recreational take of beaver statewide occurs on both public and private lands. Commercial take amounts to less than 5% of the total sales of fur and other wildlife products. Since this Amendment applies to federally-managed public lands only, the effect on furtaker income will be insignificant.
  - The number of beaver trappers and hunters have been falling for years, with only 161 reported in 2016.
  - There are proven nonlethal solutions to beaver-caused problems and organizations devoted to helping land managers use them.
  - Federal public land managers will still be able to lethally control beaver as a last resort (hopefully they will first try nonlethal)
Members of the Oregon Fish & Wildlife Commission
ODFW
4034 Fairview Industrial Drive SE
Salem, OR 97302.

Dear Commissioners:

Please consider my attached comments regarding a proposed beaver-trapping ban on the Siuslaw National Forest. Thank you.

Sincerely,
John R. Putman
OHA Tillamook Chapter President
& OHA State Board, NW Director
416 Laurel Ave., Suite #2
Tillamook, OR 97141
#503.842.7733
Email oha@johnputman.com

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May 26, 2020

Oregon Fish and Wildlife Commission  
odfw.commission@state.or.us


Dear ODFW Commissioners:

I am writing to request that you DENY the petitioned changes to the 2020 Fur Taker regulations referenced below.

Recently, some USFS Siuslaw National Forest staff have requested ODFW ban beaver trapping on the Siuslaw National Forest. Those USFS staffers apparently believe trapping is a limiting factor to the beaver population there. Whenever brought before you, such a regulation proposal should be based on data supported by science. As I understand, neither is present here to justify the request.

ODFW has authority to implement, and has in past implemented, such bans around the state when data and science support it. ODFW has monitored beaver populations and regulated beaver harvesting for well over half a century. ODFW’s own biologists assure that Oregon’s beaver populations statewide and within the Siuslaw National Forest are generally healthy and stable.

I personally fly fish streams locally in Tillamook County, including within the Siuslaw National Forest. During my sojourns, I have had the joy of seeing beaver, bobcat, river otters and more there. The evidence of beaver, raccoons and river otter inhabiting the Nestucca river is present and common. Once while fly fishing the Nestucca river near Blaine, I waded over an underwater channel into bank beaver den at the same time as its very large occupant was exiting its dwelling. We were both surprised!

In my capacities represented here and as a fisherman, as a hunter and all around outdoor enthusiast, I support science-based, wildlife and fisheries management. While my own experiences do not encompass the entire Siuslaw National Forest, they still give me pause at such a ‘trapping ban’ request. Harvest data from fur-bearing mammals such as beaver is major wildlife management tool in monitoring the health and status of a population over time. A ban, without supporting science-based data, would run contrary to the principal of multiple use of our natural resources long associated with our state and federal public lands.

In general, ODFW has a reputation of building their regulations on a solid foundation of science and supporting data. This should not change! Here, the ODFW-available data and science do not support the Siuslaw National Forest ban request. The burden is on the proponent of the regulation to produce the science and data to prove otherwise.

As part of your stewardship duties over Oregon’s fish and wildlife resources, please continue to insist on a data-driven and science-based approach to managing beaver and other wildlife. Thank you.

Sincerely,

John R. Putman  
OHA Tillamook Chapter President & OHA State Board, NW Director  
416 Laurel Ave., Suite #2, Tillamook, OR 97141; #503.842.7733; Email oha@johnputman.com
Please find attached OFB’s comments for the Commission hearing packet. Please let me know if there are any questions or concerns.

Samantha Bayer  
Policy Counsel  
Oregon Farm Bureau  
(541) 261-9961  
samantha@oregonfb.org

*Please note that in support of our members’ and staff’s well-being, and our obligation to public health, OFB’s in-office hours will vary and staff are best reached by email or cell phone until further notice. Thank you for your patience and support during the Covid-19/coronavirus situation.*
To Whom It May Concern,

I am writing in support for the ban of hunting and trapping of beavers on public lands. Other than the ethical issue of the continual killing of beaver, who have no protections in this country, we have to look at how important this species is. Beavers are a cornerstone species and it has been proven that beavers are a major influence on the health of water and water eco-systems around this country. With the looming and existing climate crisis water is and will be a contentious and serious issue. Beavers are the most important mammal when it comes to water and allowing the continual trapping and hunting on federal lands will continue to have negative effects on watersheds, creeks, rivers, and lakes. To continue this practice of hunting and trapping on federal lands is irresponsible and unethical.

I hope you will consider supporting this ban,

Jonathan Paul
Ashland, Or,
I am writing to urge you to pay attention to the current science on the importance of beaver in our ecosystems. It is time to end the trapping and hunting of this keystone species that helps keep our landscapes functioning well. Beavers are great architects.

Among their accomplishments:
* they help expand wetlands, which increases riparian vegetation, which captures and stores more carbon
* they create new and better fish and wildlife habitat for many species including salmon
* their dams and consequent wetlands provide better groundwater storage and slower run-off. This will help alleviate municipal and agricultural water scarcity and lessen flooding (which is especially important due to climate change.) This will benefit both urban and rural populations.
* by creating dams --> wetlands, they create wildfire safe zones for wildlife and livestock. Wildlife watching opportunities will improve with increased biodiversity and wildlife abundance.

The number of beaver trappers and hunters have been falling for years, with only 161 reported in 2016. That must mean their numbers are declining and/or that they are becoming less of a nuisance. There are proven nonlethal solutions to beaver-caused problems and organizations devoted to helping land managers use them.

Please vote to end trapping and hunting of this valuable species. Please close ali National Forests, Bureau of Land Management lands, National Monuments, Federal Wildlife Refuges, National Parks, and National Grasslands in the State of Oregon to commercial and recreational beaver trapping and hunting.

Thank you for your consideration.

Evelyn Roether
PO Box 489
Williams, OR 97544
Scientists have long known that beavers are vital to maintaining and improving watersheds, water quality, streams, wildlife diversity and health, fish, water storage (and thus agricultural irrigation), and availability of water for human consumption. Different National Forests have asked to close their lands to beaver hunting and trapping, yet ODFW's response has been inconsistent and most federally-managed public lands remain open to commercial and recreational furtrakers, depleting beaver colonies and preventing their dispersal to new areas of suitable habitat.

This request is being supported by a long list of scientists, conservation professionals, wildlife biologists, fishermen (and women), wildlife advocates, and conservation organizations.

Please support this change to the beaver's status to insure this wonderful and valuable species is here to stay to do its good work.

Kristina Lefever
Ashland, OR
I request a ban on commercial and recreational beaver trapping and hunting on Federally-Managed Public Lands. Beavers have been scientifically shown to increase salmon populations. I'm on the Board of the Williams Creek Watershed Council and have been involved in many stream restoration projects funded by state dollars. Unfortunately we can't use beavers who would have accomplished the stream restoration with less cost and better results.

Cheryl Bruner
As an Oregon resident, I am writing to express my support for a statewide ban on commercial or recreational hunting, trapping, killing of beavers on Federally managed public lands. As a keystone species, scientists have long agreed that beavers are vital to maintaining and improving watersheds, water quality, streams, wildlife diversity and health, fish, water storage (and thus agricultural irrigation), and availability of water for human consumption. I have lived in the Cascade Siskiyou National Monument for nearly two decades (at the headwaters of Tyler Creek) and take the responsibility to protect our environment, biodiversity, and wildlife very seriously.

Beavers create new and better fish and wildlife habitat for many species including salmon. They expand wetlands, wet meadows and increased riparian vegetation will capture and store more carbon; they’re activities provide better groundwater storage and slower run-off that can help alleviate municipal and agricultural water scarcity and lessen flooding. This will benefit both urban and rural populations. Beaver will create wildfire safe zones for wildlife and livestock on these public lands and wetter lands will quicken vegetative recovery after fire.

Banning commercial and recreational fur taking practices on federally-managed public lands will have little effect on the hunting/trapping community or land management tools. Commercial take amounts to less than 5% of the total sales of fur and other wildlife products. Since this Amendment applies only to federally-managed public lands, the effect on hunter/trapper's income will be insignificant. There are proven nonlethal solutions to beaver-caused problems and organizations devoted to helping land mangers use them. Beaver relocation programs should be extended for this purpose. I would welcome beavers on my property.

Please do the right thing for this keystone species, for biodiversity, and for water.

Respectfully submitted,

Tamara Drake
Director of Research and Regulatory Policy
Center for Responsible Science
tami.drake@crs501.org
www.crs501.org
Oregon Department of Fish and Wildlife

Please include my attached letter in your packet for the upcoming Commission hearing on fur bearer management.

Thank you.

Tom Nygren
19022 SW Finnigan Hill Road, Hillsboro, OR 97123
503-628-5472

Tom Nygren, CF
White Oak Natural Resource Service
19022 SW Finnigan Hill Road, Hillsboro, OR 97123
503-628-5472

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Oregon Department of Fish and Wildlife

Dear Department and Commission Members

It has come to my attention that the ODFW Commission is going to give consideration, at their upcoming furbearing hearing on June 11th and 12th, to a petition calling for a ban on all beaver trapping on the Siuslaw National Forest.

I have trapped beavers for many years in a number of locations in Oregon, including in watersheds such as found on the Siuslaw. I am aware that there are and have been significant closures on beaver trapping in Oregon, despite the fact that there is very little impact on beaver populations from regulated trapping. There is a lack of studies to demonstrate that closure of watersheds to beaver trapping is necessary to maintain the health of the watershed, or the health of fisheries and other biologic life in the watersheds. I understand that there are now at least 15 National Forests closed to beaver trapping, totaling 500 years — with another 231 years of closed trapping in other parts of the states. These closures go back over 30 years, and even for over 60 years in some places.

Beaver trapping is not a significant impact on beaver populations in the vast majority of situations/places in Oregon — for two reasons: 1) trapping for beaver today is primarily a recreational activity — like hunting and fishing. There is not enough financial incentive, given today’s markets, to generate large scale trapping participation, and 2) beaver populations are resilient, and are limited primarily by food sources, not the limited trapping that does or could occur today.

I am particularly concerned by this petition, because I see it as a ploy to ban trapping in general, since there is no real evidence that a closure on beaver trapping will have any demonstrated scientific ally-based benefit on the watershed given the limited and distributed trapping activity that occurs today.

Please do not give this petition any encouragement — it is unsupported by science and it is motivated by interests who have motives beyond watershed health.

Thank you,

Tom Nygren
19022 SW Finnigan Hill Road
Hillsboro, OR 97123
503-628-5472
Chairman Whal and ODFW Commissioners

Thank you for serving us in this important role of protecting our wildlife heritage.

In regards to the proposal to close beaver trapping in the Siuslaw National forest I am against that. I have trapped beaver here in Western Oregon for over 50 years and have observed, from experience, that removing a surplus of the beaver enhances the dynamics of the colonies. Beaver will expand their populations as long as they have ample food and water. When food that beaver thrive on here, willow, cotton wood, alder and maple become scares along creeks those beaver living there must move or at least run out the younger members of the colony. In many areas there is not sufficient forge to support new colonies, beaver do not do well on conifer bark' We then end up with stagnant beaver population. It is the same principal you use in big game management balancing the range with the animals.

We have a number of beaver trapping closures here in Oregon forest that have been in place for years and to my knowledge there is no data to show that the closure has enhanced the beaver population.

Thank you, Donald L Nichols
Good people at the Oregon Fish and Wildlife Commission,

I just listened to a great webinar by Ben Goldfarb, author of the book "Eager: The Surprising, Secret Life of Beavers and Why They Matter".

I strongly support the development of a beaver conservation plan that also restrict trapping in our state, as I see the returns of the beavers as a very useful way to restore wetlands, to increase habitat for many plant, fish and animal species, and to help with fire mitigation.

Thank you,
Kari Rein

James Jungwirth and Kari Rein
Naturespirit Herbs
PO Box 150
Williams OR 97544
(541) 846-7995
info@naturespiritherbs.com
May 25, 2020

Oregon Fish and Wildlife Commission
4034 Fairview Industrial Drive SE
Salem, OR 97302

Dear Chairperson Wahl and Fish and Wildlife Commissioner members:

As a forester working with wildlife biologists, I testified before the Oregon Wildlife Commission regarding river beaver trapping on public lands in Oregon Spring 2000.

Spring/Summer 2000 we knew the following:

1.) With high-density river populations riparian restoration with Douglas fir, western hemlock and western red cedar for future large woody recruitment does not happen. River beavers at high densities clearcut conifers.

Dr. Mike Newton (OSU) demonstrated north sided riparian buffers increase coastal stream production, however sunlight brought into the riparian system produced more beaver food and more beavers. More beavers cut down more trees.

2.) Larry Cooper (Retired) ODFW Furbearer biologist, helped fund OSU graduate student Raymond E. Rainbolt. Raymond’s thesis Historic Beaver Populations in the Oregon Coast Range. December 15, 1999, was a collection of Oregon-Washington librarians/historians interviews and the gleaning of the Hudson Bay Company Archives,
Pacific Fur Company and North West Company trapping records and company transcripts.

After reviewing pre and post European settlement records and western Oregon native peoples' customs and cultures, Raymond concluded the following regarding historic river beaver populations in western Oregon. "Beaver were common in the Coast Range, but not abundant. If beavers were found in greater numbers in the Coast Range, it is likely there would have been greater trapping effort in the region especially based on Hudson Bay Company policy of eradication beavers south of the Columbia River. (The paucity of information of fur trapping exploits in the Coast Range is just as important as the available information.)***Hence, beavers probably had negligible influences on salmonid populations.***

3.) Beavers plug road culverts. Physical barriers and piping around culverts never worked. Roads wash out. Sedimentation downstream occurs. Road damage in Western Oregon costs tens of thousands of dollars. Trapping nuisance beavers at road crossings works.

4.) Dr. Kim Wagner, Dr. Dale Nolte, myself, and many, many others during the winters of 1997 and 1998 through extensive field research, demonstrated that there was no correlation between beaver density and the density of beaver dams. There was a positive correlation between beaver density and the proportion of damaged conifers at 5 and 20 meters from the waterline.

Since Spring/Summer 2000, Dr. Jimmy Taylor and Vanessa Petro have demonstrated that relocating urban problem beavers to the best salmonid habitat of the Siuslaw National Forest just didn't work. Prime salmon stream habitat was already fully occupied by bank denning beaver. Established family beaver colonies don't allow newcomers. Cougars eat transplanted beavers without established homes.

If public land administrators want more beavers, there is an easy solution. USFS research in northern California and Dr. Mike Newton's research is western Oregon show that opening riparian systems to the sky through active riparian management, allows light to reach the riparian system. Cherry, vine maple, and blackberries will grow and beavers will move in to harvest and eat them. River beaver densities increase.

Sunlight is the answer. Beaver densities can be managed by Oregon's responsible trapping community. In Dr. Kim Wagner's and Dr. Dale Nolte's abstract, Relationship Among Beaver
Density, Beaver Dams and Damage to Forest Resources in the Pacific Northwest findings indicate that it may be possible to manage beaver for some low level of within-colony density that will minimize damage without reducing the density of beaver dams and associated ponds.

Very Best Regards,

Mark Gourley
Forester, CF
2280 Primrose Loop
Philo, OR 97370
Via Email: odfw.commission@state.or.us

May 26, 2020

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

RE: In Support of Requested Amendment to OAR 635-050-0070, Furbearer Trapping and Hunting Regulations

Dear Commissioners,

I am writing to urge you to support the request to amend OAR 635-050-0070 and close National Forests, BLM managed ground, National Monuments, National Parks, National Grasslands, and USFWS Refuges in Oregon to commercial and recreational beaver trapping and hunting in order to begin to address statewide water-related concerns and fish and wildlife needs.

I write this as a taxpayer who lives in eastern Oregon and as a retired Forest Service Hydrologist/Soils Specialist who worked on the Wallowa-Whitman National Forest for almost 16 years. I write this as someone concerned about my community in Baker County and what lies before it in terms of water availability and quality. And I write as someone who values fish and wildlife and wants to create the quality of habitat that provides for them even under a changing climate.

I feel taxpayer fatigue as we are asked over and over to pay for the same expected event, namely drought. We are asked to do so without any steps taken to improved stream and riparian conditions on our federally managed public lands that can help minimize those impacts on our communities and therefore costs. Were we to actively take the steps needed to improve conditions, it would mean we could spend those limited dollars on other things that need attention in our state.

As a hydrologist I have walked many streams. Most are over wide and incised with only a narrow band of riparian vegetation along its banks. I have measured stream temperatures as part of my job and found most streams on my prior district above the state standard with some streams recording temperatures in the 70s and 80s°F. And yet hope exists. In addition to the elevated stream temperature, the temperature data loggers also have recorded temperature drops of 3-5°F in less than 1000 linear feet on one stream that passes through a reach with intact beaver dams. The ponds and elevated water table created not only the cooler temperatures but a wide zone of lush riparian vegetation.

Human powered restoration is costly and the actual area influenced limited. I have sat in restoration related meetings, talking projects and looking at price tags and how little that effort was actually going to accomplish. With declining budgets at the federal and state and county levels, figuring out new partnerships become critical. Partnering with beavers to do stream restoration work that they do better, cheaper and faster and also maintain makes fiscal and ecological sense.
The pandemic has revealed our vulnerabilities, and money to help communities with drought is going to be even less available. When everyone is in drought, who do you help? When schools and food banks are struggling and families can’t pay the rent, is helping those hurt economically by drought the best use of limited state and taxpayer dollars -- especially when we have a partner who can help fix the systems and improve conditions? Already I am hearing concerns about drought, about reservoirs not filling and when there are concerns of drought, wildfire worries are not far behind. Twice during my tenure my district had large wildfires – Cornet Windy in 2015 and Rail in 2016. The costs were high and safe zones for wildlife and livestock few because wetlands, wet meadows and ponds were limited. Here too beavers can help by creating a landscape with refuges, not only from heat and drought but from wildfire. Every wildlands firefighter knows to identify a safe zone. Will we not give our wildlife and livestock a similar chance at survival (see attached photo)?

We need to start restoring streams on these federally managed public lands statewide and at a scale and speed that makes real progress. Will beavers be able to solve all our problems, fix every stream? Is commercial and recreational beaver trapping and hunting the only thing standing in the way of healthy streams and riparian areas? Of course not, but it is a critical piece. Do land management agencies have a responsibility to change management to improve riparian conditions in some areas? Absolutely. However, beavers are amazing and they are able to assess what is and is not possible as a dam-building site, far better than we are, and in the process expand their habitat. And all the great habitat in the world will only take us so far if beavers aren’t there. That is what my own field work has shown me.

We can endlessly do the round robin of pointing fingers and saying it’s not beaver trapping and hunting it’s grazing and us us versa. Or we can acknowledge that it is both in some places, and in others one dominates and do what we can where we have influence as ODFW does in the case of beavers. ODFW can end the round robin of who or what is responsible. It can make a decision to do its part -- end commercial and recreational beaver trapping on these federally managed public lands -- and in doing so demonstrate its commitment to best available science and its leadership when it comes to managing Oregon’s fish and wildlife. This decision, fully and solely within the sphere of influence of the Commission, will allow the processes required to restore streams and riparian areas throughout the statewide to begin at the speed and scale needed to help minimize future impacts to our wild and human communities. Only ODFW can do this, only ODFW can lead on this issue. I urge you to vote yes.

Sincerely,

s/n Suzanne Fouty
Hydrologist/Soils Specialist
USDA Forest Service (retired)
Baker City, OR
Beaver ponds provide an “emerald refuge” in a landscape burned by the Sharps Fire, Idaho. Photo: Joe Wheaton


Several short videos (2.5 to 10 minutes) that cover a range of topic related to beavers.

https://vimeo.com/98496024

http://habitat.psmfc.org/living-with-beaver/
FW: Oregon Dairy Farmers Association Comment RE: Furbearer Regulations in OAR 635-050-0070

From: Tammy Dennee <tammy.dennee@oregondairyfarmers.org>
Sent: Tuesday, May 26, 2020 3:21 PM
To: odfw.commission@state.or.us
Cc: Curt Melcher <curt.melcher@state.or.us>
Subject: Oregon Dairy Farmers Association Comment RE: Furbearer Regulations in OAR 635-050-0070

Please see our attached letter of comment for the record. Thank you very much.

Tammy L. Dennee, Legislative Director

OREGON DAIRY FARMERS ASSOCIATION
1320 Capitol Street NE, Suite 160
Salem, OR 97301
Office Phone - (971) 599-5269
Mobile Phone - (541) 980-6887
May 26, 2020

Curt Melcher, Director
Oregon Department of Fish & Wildlife
4034 Fairview Industrial Dr. SE
Salem, OR 97301

Sent via E-Mail
odfw.commission@state.or.us

Director Melcher and Commissioners:

The Oregon Dairy Farmers Association is the Trade Association representing Oregon’s 200 dairy farmers. We offer remarks in opposition to petitioned changes to the 2020 Furbearer Regulations in OAR 635-050-0070.

A great percentage of Oregon’s dairy farms are located in and around Tillamook County along the coastline where the average rainfall can exceed 100 inches annually. The balance between mother nature and the wildlife in and around every dairy is an ongoing balancing act. The existing management of the beaver population is a system that currently reflects a balanced approach. To disrupt the existing administrative rules in response to a petition in absence of sound science and staff recommendations could likely result in unintended consequences. As we understand it, ODFW staff, in both the wildlife and fish divisions, have not recommended any major changes to the furbearer regulations and do not support requests to ban trapping.

ODFA respectfully recommends a full process of exhaustive research prior to rulemaking through a transparent and deliberative process be undertaken prior to any modifications to the 2020 Furbearer Regulations.

Thank you for your consideration of our input. If we can be of assistance to you during your deliberations, please feel free to contact us.

Sincerely,

OREGON DAIRY FARMERS ASSOCIATION

Tami Kerr
Executive Director
Tami.kerr@oregondairyfarmers.org

Tammy Dennee, CMP, CAE
Legislative Director
tammy.dennee@oregondairyfarmers.org
Pursuant to the Notice of Proposed Rulemaking dated 4/22/20 on the above matter, please find attached comments by Humane Voters Oregon. Please include these in the package that goes to the Commission if there is still time to do that.

Also, for purposes of further public comments, what is the best email to use? Roxann as the rules coordinator or the general odfw commission address (included on this email)? Thanks for your help.

Brian

Brian Posewitz
Secretary | Director
Humane Voters Oregon | 8508 S.E. Eleventh Avenue | Portland, Oregon 97202
Phone: 503-946-1534
Email: brian@humanevotersoregon.org | Website: www.humanevotersoregon.org
Facebook: www.facebook.com/humanevotersoregon.org

Click here to help Humane Voters Oregon and Humane Voters Oregon PAC advocate for animals in Oregon’s political process.

HUMANE VOTERS | OREGON
VIA Email

Oregon Fish and Wildlife Commission
4034 Fairview Industrial Drive SE
Salem, OR 97302

Re: Proposed Furbearer Regulations for 2020-22

Dear Chair Wahl and Members of the Commission:

Humane Voters Oregon offers the following comments on the Furbearer Trapping and Hunting Regulations for the 2020-2021 and 2021-2022 seasons. We understand this issue is on your agenda for the meeting of June 12, 2020.

By way of background, Humane Voters Oregon was formed in 2014 to help advocate for humane treatment of animals in Oregon. We participate in policymaking proceedings before administrative agencies, the state legislature, and local governments. In addition, we participate in Oregon’s electoral process. We have board members from a variety of animal welfare organizations but are not affiliated with any other state or national organization.

We have the following comments on the draft rules:

1. In general, we oppose trapping and killing wildlife solely for its fur. Please consider, from public comments received and other information, whether most Oregonians also oppose this. Please also bear in mind that, according to license-sale information in the rulemaking notice, rules allowing the trapping and killing of wildlife for its fur appear to be for the benefit of a very small number of Oregonians who participate in these activities — less than one tenth of one percent.

2. We oppose trapping, in particular, because it forces animals to suffer for extended periods of time, in a restraining trap or a kill trap that did not work as intended, and often with
significant painful injuries inflicted by the trap, until the trap is finally checked (and the animal killed), or until the animal dies from its injuries, thirst or starvation. Moreover, traps often catch non-target species, including pets, and subjects them to injuries, pain, suffering and sometime death. Again, this is being done for the benefit of a tiny portion of Oregon’s population. Please see the joint comments we submitted with other organizations for additional information on these points.

3. If nothing else, the Commission should require trappers to check their traps at least once every 24 hours to reduce the amount of time trapped animals suffer. Currently, depending on the species and whether the trapping is on public land or private land, a trapper may be able to check a trap as seldom as once a week, even if the trap is intended only to restrain and not kill the animal. OAR 635-050-0045(12)(b). That means animals can legally be restrained in one place, without food or water, and probably with significant injuries, for up to seven days. In this day and age, that cannot be considered humane. We also elaborate further on this point in our joint submittal with other organizations. We recognize there may be legal questions regarding the Commission’s authority to require 24-hour trap-check times for all species on all lands but believe the better argument is that legislative direction on the subject establishes the minimum, not the maximum, frequencies in which traps must be checked.

4. We oppose the provision allowing bobcats, raccoons and opossums to be hunted at night with artificial light, OAR 635-050-0045(6), on grounds that doing so is inconsistent with principles of fair chase. See https://www.pope-young.org/fairchase/default.asp; https://www.boone-crockett.org/huntingEthics/ethics_affidavit.asp?area=huntingEthics.

5. We oppose the provision allowing bobcat, raccoon, fox, and “unprotected mammals” to be hunted or pursued with dogs. OAR 635-050-0045(8). While there may be disagreement over whether hunting these animals with dogs is fair chase, the Commission should be guided by the Oregon voters, who decided in 1994 (when they adopted Measure 18) and again in 1996 (when they declined to repeal Measure 18) that hunting cougars with dogs is inhumane. We see no reason to think it is any different for bobcats, raccoons, foxes, or other mammals.

6. We support the prohibition on the use of traps or snares suspended in trees in the Siskiyou and Siuslaw National Forests. OAR 635-050-0045(18). We understand this is to protect Humboldt martens, which are struggling for survival as a species.

7. We support the prohibitions on hunting and trapping of wolverine, fisher, ringtail cat, sea otter and kit fox, OAR 635-050-0160, on grounds these species are limited in number (to the extent they exist in Oregon) and especially need protection from hunting and trapping for their fur.

8. We oppose the proposed pursuit seasons. OAR 635-050-0170. Chasing wildlife with dogs – for training, recreation and entertainment – is traumatizing to the animals and inhumane.

9. We oppose the hunting and trapping of beavers. OAR 635-050-0070. In addition to the reasons stated above, beavers should be better protected because there is increasing recognition in conservation communities that their dams provide important benefits to watersheds, primarily by maintaining floodplains and riparian areas, and preventing stream
“incision,” which helps maintain stream flows during hot, dry seasons, and is good for fish and wildlife generally. We understand the Commission will receive a request from numerous restoration groups, supported by numerous conservation organizations, to prohibit beaver hunting and trapping at least on federal public lands. We support this request as a good first step toward better protection of beavers.

Thank you for considering our comments.

Sincerely,

Brian Posewitz

Brian Posewitz
Director
Roxann B Borisch

From: SALLY-JO BOWMAN <sally-jo.bowman@comcast.net>
Sent: Monday, May 25, 2020 5:53 PM
To: odfw.commission@state.or.us
Subject: testimony for furbearer meeting June 11-12, 2020

To: Oregon Department of Fish and Wildlife Commissioners

Re: June 11-12, 2020, meeting to consider a proposal to ban all beaver trapping on Oregon public lands and in particular in the Siuslaw National Forest.

I have trapped in various parts of Oregon since 1960. Currently I do some beaver damage control. I am now retired, but spent much of my career in outdoor education in various forms, many of them involving wildlife. For the 20 years since I retired I have been an ODFW volunteer with the Fern Ridge Wildlife Area west of Eugene. I also have assisted the Springfield office, notably with bear research and years of fish planting, and the Leaburg Fish Hatchery with predation control. I also teach with the Eugene Parks Department River House Outdoor Program, McKenzie River Trust, Nearby Nature, and the Willamette Research and Education Network. My particular expertise is wild mammals of Oregon.

As a trapper, ODFW volunteer, conservationist and wildlife educator I applaud wildlife management policies that bring ecological balance among species and are based objectively on dispassionate comprehensive scientific research. Conversely, I also appreciate the commission avoiding decisions based on aesthetic, ethical or cultural sensibilities of special interest groups. I support policy decisions that factor in broad views but also the specifics of particular geographies. I have trapped beaver in accordance with the laws of Oregon and also have reviewed a great deal of research about beaver. I have concluded that any further closure of beaver trapping on public lands in Oregon is unnecessary and misguided. Broad, blanket policies and no rules at all, the extremes of management, are equally ineffective.

Habitat is crucial to any animal flourishing. Oregon beaver are thriving in riparian zones that offer water, food source, shelter and safety. In Oregon, especially on the west side of the Cascades, classic stick-built beaver lodges are seldom seen and dams are few because floods destroy them too often. Instead the beaver in this terrain excavate dens in river banks. Suitable banks are not available in steep, fast-flowing, rocky streams found throughout Oregon, so beaver seek gentler waters. Another factor: A closed canopy of conifers does not provide either food or building material for lodges and dams. Banning trapping will not increase the beaver population in steep country. The water is there, but not a food source or means of shelter and safety.

Some 40-50 years ago I regularly observed beaver throughout Siuslaw National Forest lands, state lands and private timberland in the Coast Range. Now, although beaver prosper in river tidewater, they no long inhabit the smaller streams in the upper reaches. It would be easy to conclude they have been over-trapped. In fact, the reason is that the habitat is no longer suitable. In most of the 20th century, logging to the streamside followed by slash burning provided an abundance of food suitable for beaver and if the banks were other than rock cobble or the gradient allowed for a dam, the beaver were there. Current timber regulations prevent that kind of logging and the new streamside vegetation is not suitable food. Consequently, even if the department were to relocate beaver to those small streams from the robust populations on the main stems of coastal rivers, the higher elevation habitat will not support re-establishing beaver.

Efforts to live-trap and relocate beaver in hopes of extending their range have been going on at least since 1934. Reports from 1934-1952 bear out my point that relocation sites must provide water, food, and means of shelter and safety. There have been several quite recent efforts at beaver relocation to areas in the Coast Range suggested by computer models, but the habitat is no longer suitable and most of the relocated beaver did not "stick," and those few that did stay became prey of cougar.
There is much written about beaver and beaver relocation in other parts of the United States. It is a mistake to think that policies and relocation efforts that work in, say, the Northeast, will work in Oregon. We need to set policies tailored to the needs of the many ecological zones in Oregon. Decisions about the particular issue of banning trapping on public lands should take into consideration that trapping is an effective tool for wildlife management in balancing populations, controlling dangerous predation, mitigating damage to property and crops, and studying wildlife habitat and habits.

I ask that, before enacting further closure of beaver trapping, the commission consider my experience and views and take the necessary time to review the numerous existing closures and their purpose, and evaluate whether they have been effective. If part of today's goal is to extend beaver range into areas where they formerly lived, the way to accomplish it is neither to forceably relocate beaver nor to ban trapping but instead to improve and enhance habitat beginning near where beaver presently live. Some private groups and public agencies already are doing this. Eugene's Delta Ponds project is a good example. Beaver have naturally moved from the nearby Willamette River into the ponds and built lodges, where just last week I observed twelve beaver and could be certain of activity in two of the three lodges.

Yours sincerely,

David C. Walp
2380 5th St.
Springfield OR 97477
541-741-1654
Dear Commissioners,

Hello my name is Rusty Kramer. I live in Southern Idaho and have been a beaver trapper my entire life. I am also the President of the Idaho Trappers Association. I have a very deep connection to beaver trapping.

I have been live trapping problem beaver for 25+ years. I am a watermaster for a irrigation district and beaver are a menace around ag land. I then sell these beaver to the Forest Service, alive. I sell them between 20-50 beaver each summer. They are putting these in areas that are void of beaver. Now, our forest service has closed some units just north of my town that had beaver transplanted into them. The trapping season has been closed since the 80's. I frequently pass by these creeks and they had beaver by the hundreds, and dams were every 50 yards up this creek for miles. Two years ago every single beaver got a disease of some kind and miles and miles of creek had no beaver. Our local forest service had literally "loved" these beaver to death. Beaver are part of the rodent family and are very resilient. Where I was saying I divert water for our irrigation district I have trapped beaver there since before I had a drivers license. These beaver are trapped every year all summer long and their population is as healthy as ever. You cannot stockpile animals and it would be actually hurtful to the beaver population to not manage it by removing some with recreational trapping. Don't go the way of Washington and have a beaver population out of control because you have banned trapping of beaver.

Thank you for letting me voice my concerns,

Rusty Kramer
Idaho Trappers Association President
idahotrapguy@hotmail.com
208-870-3217
May 25, 2020

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

Dear Commissioners:

We are writing in support of the request to end commercial and recreational beaver trapping and hunting on federal lands in Oregon.

This action will help ensure a future in which there is abundant water, fish, and wildlife for all Oregonians. It will help restore degraded aquatic systems as quickly and cost-effectively as possible. It will help improve the quality and quantity of water for use by agricultural communities and cities. It will provide places where wildlife and livestock have a chance of surviving wildfires. It will help create new recreational and educational opportunities throughout the state. It will provide a creative and cost-effective way to address climate change. This action will also help restore coho salmon, a fish species that has great cultural significance to all Oregonians.

Importantly, this amendment will accomplish all these benefits for all Oregonians at little or no cost to taxpayers, simply by partnering with a keystone species, ecological engineer, and our state animal, the American Beaver.

Thank you for considering this request.

Let the beaver do the work!

Respectfully,

Randy and Pam Comeleo
Co-founders
Benton County Agriculture and Wildlife Protection Program
Corvallis, OR
Chair Wahl, commissioners and staff,

Please see the attached comment from the Oregon Chapter of The Wildlife Society regarding recent requests to change furbearer regulations to ban beaver trapping. Thank you for your consideration of the wildlife profession and science in developing wildlife management policy.

Thank you,
Leland Brown

--
Leland Brown
Board Member
Legislative Committee Chair
Oregon Chapter of The Wildlife Society
603-991-8132
lelandbrown@ortws.org
FROM: Oregon Chapter of the Wildlife Society

SUBJECT: Requests to Ban Beaver Trapping

TO: Oregon Fish & Wildlife Commission

Dear Commissioners:

The Wildlife Society is an international organization founded in 1937, representing nearly 10,000 professionals, including scientists, managers, educators, technicians, planners, consultants, conservation officers, students and others who manage, conserve, and study wildlife populations and habitat. In Oregon, the Oregon Chapter of The Wildlife Society (ORTWS) represents nearly 800 such professionals from many areas of public and private enterprise. Our mission is to promote wise conservation and management of wildlife resources in Oregon by serving and representing natural resource professionals. A central purpose of ORTWS is to support scientifically sound management policies.

ORTWS is writing in response to multiple requests submitted to the Commission to amend OAR 635-050-0070 as it pertains to where American beaver (Castor canadensis) may be trapped within the state, specifically:

- Requests to ban beaver trapping within Siuslaw National Forest in response to restoration efforts
- Requests to ban beaver trapping across all federal lands in Oregon

The best available science does not support permanent trapping bans

ORTWS does not recommend the adoption of either request based on our review of the best available science on current beaver populations and management strategies within the state of Oregon. A permanent ban on beaver trapping across the Siuslaw National Forest and/or across all federal lands in the state lacks data to support claims that recreational and commercial beaver trapping are limiting factors to beaver populations (Figures 1 & 2, Appendix). Annual harvest of beavers has decreased since 1950 as a result of reduced hunting and trapping efforts, and current beaver populations in Oregon are considered to be very healthy (Hiller, 2011). Through our review of available research, we determined there is a need for more data collection and additional studies on habitat availability and habitat use by beaver throughout the state to better inform management decisions. When resources such as water and food are limited, beaver move to areas where those resources exist.
Numerous scientific articles showcase the benefits beaver play as ecosystem engineers and as a keystone species across the west (Naiman et al. 1986, Pollock et al. 1995, Gibson and Olden 2014, Bouwes et al. 2016). Their value to the ecological health of riparian systems and their ability to improve habitat for other species cannot be understated. However, management decisions that limit sustainable use of wildlife resources must be evaluated based on biological science, and demonstrate effective strategies to accomplish ecological restoration goals.

A recent beaver relocation study conducted in the Alsea Basin, which included release sites on Siuslaw National Forest, did not identify recreational or commercial trapping as a cause specific source of mortality (Petro et al. 2015). Another research study conducted in western Oregon found no evidence that beaver dispersal is limited by terrain features and that beaver appear to move freely within watersheds (manuscript in review, J. Taylor personal communication). Ongoing research in western Oregon is developing models to look at the effects of beaver dams on water temperature, developing models to predict beaver occurrence, and integrating beaver habitat use with climate change scenarios. More studies like these need to be completed in order to better understand best practices for managing watersheds that include beaver.

Sustainable wildlife resource management and responsibility

Permanent trapping bans would be in opposition to the well established practices of sustainable resource harvest and proven wildlife management strategies widely utilized in the North American Model of Wildlife Conservation (Organ et al. 2012). The long term success of the North American Model comes from seven interdependent principles that must be maintained for consistent, sustainable conservation. A core principle of the North American Model is the application of wildlife science to discharge management of wildlife resources. Given the lack of data on negative impacts of trapping, combined with harvest data showing recreational trapping harvest rates per unit effort have been consistent, there is little indication that trapping is having a negative population impact (ODFW, private communication, May 13, 2020). Trapping has long been recognized as an appropriate management tool for wildlife and habitats (AFWA 2015), and significant efforts have been put forward to implement and maintain appropriate management techniques and strategies. Statewide or even regional bans on recognized management tools must be supported biologically, be limited in scope both spatially and temporally, and allow for the resumption of sustainable use when appropriate.

The Wildlife Society has adopted internationally accepted principles of natural resources conservation. These principles stipulate that management must maintain essential ecological processes, preserve genetic diversity, and ensure sustainable population numbers for the continued persistence of the species and the ecosystems they affect. Regulated trapping in Oregon is consistent with all of the aforementioned criteria and is recognized as an ecologically sound method of harvesting and managing furbearers that also provides for recreational and economic benefits (TWS 2020). Additionally, we support the Best Management Practices (BMP) for trapping that have been developed by the Association of Fish and Wildlife Agencies (AFWA 2020) and encourage ODFW to continue to promote these BMPs in furbearer management and outreach programs. Finally, regulated trapping is an important component of the lifestyles and
tradition of many people, and was the primary economic and political driver behind the U.S. establishing the Oregon Territory back in the early 1800s. Maintaining interest and support in sustainable activities that rely on the conservation and long-term survival of the species and associated habitats is good policy, using a robust foundation of wildlife science. Support for beaver populations must include all stakeholders, including those likely to be impacted by beaver behavior. Maintaining sustainable trapping activity is an established management method that allows the address of beaver conflict, while continuing to maintain funding for beaver conservation, and support for beaver populations as a whole.

Data and research is necessary to better inform management decisions

Current data on beaver harvest indicate a sustainable population, however there are gaps in what land managers want from beaver and what beaver can provide. A review of beaver-related restoration practices in the western US indicated the need for investment in research, as implementation of restoration practices is occurring without evidence of efficacy or established best management practices (Pilliod et al. 2017). ORTWS strongly recommends that the Commission support further research related to managing watersheds that include beaver. All stream or river restoration projects should have baseline information on seasonal and annual use by beaver prior to initiating a project, and follow those observations through and after project completion. Monitoring of restoration efforts that include beaver are critical to address habitat restoration goals, and associated benefits to salmonids and other species. As wildlife managers, and public servants it is critical to address the efficacy of these efforts, to fulfill the public trust responsibility.

We reviewed numerous existing beaver trap bans in Oregon that date back decades, including Mt. Hood, Wallowa-Whitman, Ochoco, Malheur, and Umatilla National Forests. Despite an average length of ~46 years for trapping limitations, we found no peer-reviewed research or written evidence in general that changes in beaver populations, or their effects on the landscape, were monitored much less reported. To allow another beaver trap ban in Oregon without baseline information on beaver and a plan for monitoring those effects is ill-advised and against the practices of responsible wildlife management.

Recognizing the complex public acceptance and understanding of trapping

ORTWS recognizes that significant opposition to trapping exists among the public and we strongly advocate for further research to be conducted on furbearers, trappers, trapping methods, and attitudes of the public toward trapping to advance understanding and facilitate resolution of this controversial issue. Healthy beaver populations improve habitat for a variety of species and have large ecosystem benefits. However, beavers also have a history of conflict with human populations, with the potential for damage and associated loss of support from local communities. As seen in published research from Massachusetts, beaver trapping bans can have unintended consequences, such as increasing human-wildlife conflict, that change public attitudes (Jonker et al. 2006, 2009; Seimer et al. 2013). Developing management strategies must balance both the biological necessity of conserving this important species on the
landscape, maintaining public support, and engaging a variety of stakeholders in effective, science-based management to fulfill the public trust.

On behalf of ORTWS Members and Board, thank you for your time and consideration in this matter and please do not hesitate to contact us with questions or to engage further discussion.

Respectfully,
ORTWS Board of Directors

"Conservation is paved with good intentions, which prove to be futile or even dangerous because they are devoid of critical understanding..."
Aldo Leopold - Sand County Almanac

Literature Cited:


ODFW. Oregon Furtaker License and Harvest Data prepared for ODFW Commission Meeting on June 7, 2018. https://www.dfw.state.or.us/resources/hunting/small_game/docs/Furtaker_License_and_Harvest_Data.pdf


Appendix 1:

Figure 1: Beaver trapping and hunting take in Oregon from 1997-2016. Notice the total take has declined significantly since 1997 in response to reduced trapping and hunting efforts. Harvest success per unit of effort has remained steady, this is one indication that populations are stable and trapping/hunting pressure is not negatively affecting population (ODFW, 2018).

Appendix 10. Oregon beaver and muskrat catch per unit effort (Harvest/100 trap nights or days hunted) and average harvest per furtaker, 1997–2016. Data compiled from furtaker annual report where harvest and effort is reported. Take values exclude reports without reported effort, but occur in Appendix 14.

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<th>Species</th>
<th>Year</th>
<th>Total Take</th>
<th># Trap Nights</th>
<th>Take/100 Nights</th>
<th>Total Take</th>
<th># Hunt Days</th>
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<th>Total Furtakers</th>
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Figure 2: Figures below are from the Oregon furbearer program report, 2010-2011 (Tiller, 2011).

Relative number of beavers taken by trappers in Oregon during the 2010-2011 season.

Annual harvest of beavers by trappers in Oregon during 1951-2010.
May 25, 2020

Oregon Fish and Wildlife Commission
4034 Fairview Industrial Drive SE
Salem, OR 97302

Dear Commissioners:

Pacific Forest Trust is a non-profit dedicated to the ecological management and conservation of Oregon’s private forests. We are committed conserving Oregon’s private forests for the many values they provide, including wood, water, wildlife, climate resilience, and strong local economies. With over 20-years experience managing and conserving private forests where beavers have historically been active in the state, we urge you to support the suggested amendments to Furbearer Trapping and Hunting Regulations (OAR 635-050-0070), as submitted by a group of Oregonians for your review and vote on June 12.

Since 2000, the Pacific Forest Trust has implemented science-based management on the 7,200-acre van Eck Oregon Forest in Lincoln County. As Grantees of the Conservation Easement governing the van Eck Forest, we are also responsible for the perpetual conservation and stewardship of these lands. Bordered by the Siuslaw National Forest, we share their commitment to returning beavers to their historic range and increasing their populations. The water, fish and wildlife benefits of this far outweigh any damages associated with beaver population increases and return to historic ranges.

A 2018 wildlife inventory carried out by Turnstone Environmental Consultants identified suitable American beaver habitat on all tracts of the van Eck Oregon Forest, and concluded that American beavers were likely present, although not documented. The benefits of returning beavers to the landscape are real and tangible. There are challenges that beavers can sometimes bring, such as blocking culverts, flooding roads and meadowlands, and damaging timber. However, in most cases, these challenges can be easily prevented or resolved. As such, we would be pleased to have an increased beaver presence on our lands, and feel it is a manageable burden, especially compared to the water and habitat benefits beavers create.

For decades, the positive benefits of beavers for habitats and a number of species—especially for fish and amphibians—has been well known and documented in both peer-reviewed science and field observations. It is time to act upon that knowledge.
We thank the Commission for your consideration and urge you to amend OAR 635-050-0070 as it pertains to beavers, using the draft rule language provided by Appendix A. Amending this rule will increase Oregon’s resiliency and stability as human and wild communities collaborate to undertake statewide stream and riparian restoration at the scale and speed needed to help minimize the impacts of climate change on our communities.

Sincerely,

[Signature]
Laurie A. Wayburn
President
Pacific Forest Trust
I am opposed to closing beaver trapping in Oregon. We all own these lands. Please don't take away our enjoyment.

Thank you.
Brent Bonecutter
irun.bike@yahoo.com
It has been brought to my attention that you are considering banning the trapping of beaver on public lands in the name of protecting salmon. I would like to oppose this. Beaver trapping should be allowed anywhere. Beaver need to be controlled and trapping them helps the salmon more than hurts them. I have been asked to trap beaver several times, to HELP restore salmon runs. Your idea of stopping trapping them flies in the face of what I have seen on the ground. Beaver build dams that salmon can't cross. Add to that, trapping is a dieing art, and less and less people do it. There is no money in trapping anymore. It's mostly done to help the ecosystem and the land owner. Don't tie peoples hands with something that is just feel good virtue singling. Thanks for your consideration.

David Prim
Land owner and trapper.
Good evening ODFW,
I am a resident of Josephine County, Oregon, and I’ve learned that a ban on beaver trapping is being considered here.

I strongly oppose this proposal to ban beaver trapping on public lands.

Beaver activity jeopardizes millions of dollars in transportation infrastructure and can also cause significant damage to timber resources based on research in other states with an overrun population of beavers. This includes damage from dam building, flooding, and tree cutting.

To ban beaver trapping in the State of Oregon removes another right from citizens that imposes on the freedoms of self perseverance. It removes a way of life away from many Oregonians who have embarked on this way of rodent and predator control.

Trapping has received a poor reputation by activists who have never observed it in practice. They speculate and attack what is actually a humane practice of keeping this animal population under control. ODFW has other ways to enforce limits but to ban trapping of beavers is wrong and unnecessary. Please do not allow this bill to pass.

Respectfully,

Deborah Collins
2266 Riverbanks Rd.
Grants Pass, Or, 97527
To all Commission Members,

As a lifelong resident of the coast range, I have observed firsthand the changes that have made it difficult for beaver colonies to establish in the small coastal tributaries.

Changes in the forest management practices have created large buffer zones, and darker forest canopies in general, that are shading out the streams resulting in poor food quality. Then in 1994 the prohibition of hunting cougar with hounds resulted in an enormous increase in cougar numbers.

Beaver simply cannot survive cougar predation in the small coastal tributaries, especially in the low water conditions of summer.

The larger rivers (approximately 20 feet in width or more) that offer safety from terrestrial predators are supporting very healthy beaver populations, in fact there are a lot of these rivers, and large streams, actually overpopulated with beavers.

Beaver trapping is not even a relevant factor in the absence of beaver colonies in small tributaries. Therefore, I am asking the commission to deny the pending anti beaver trapping proposals, which are in my opinion, based purely on emotionalism, not sound biology.

Thank You for Your Consideration,

Wayne Loyd
P.O. Box 1605
Drain OR 97435
Dear Oregon Fish and Wildlife Commission,

I'm writing as an Oregonian and animal lover. As an alumnus of OSU I am proud to be a part of Beaver Nation. Beavers are an important part of our cultural and ecological landscape, and they're crucial allies in the fight against climate change.

I am asking you to protect beavers and preserve their habitats. They are an important link in the ecological chain. As you update the state's furbearer regulations, I request that you end commercial and recreational beaver hunting and trapping on federally managed public lands in Oregon, including national forests, BLM lands, national monuments, wildlife refuges, national parks and national grasslands.

Sadly, we are experiencing the impacts of climate change in Oregon in the frequency and severity of drought, wildfire and flooding. And we know that restoring riparian ecosystems will be crucial to mitigating those harms. But our current hunting and trapping policies hurt one of our most important partners in that restoration. Beavers build dams for their own benefit, but in doing so they create habitat for a host of other species. Scientists have shown that beaver dams also improve water quality, trap and store carbon, and could provide important groundwater storage for dry climates.

For all the above reasons, I'm asking you to please close federally managed lands in Oregon to commercial and recreational beaver hunting and trapping, so these valuable animals can provide the greatest benefit.

Sincerely,
Babs Alvernaz
Junction City, OR 97448
babs@fire2wire.com
Dear ODFW Commissioners,

I am writing to request that you DENY the petitioned changes to the 2020 Fur Taker regulations.

I have trapped for years up and down the Umatilla river drainage system. This year with all the floods show that beaver populations have increased greatly and severe erosion due to cotton wood stands being decimated by beavers prove that populations are good. The dams for irrigation and the amount of people have remove food plains and back water areas. Most federal lands here are at altitudes that creek and river systems are narrow and not beaver habitat. Forcing river channels to narrow fast moving drainage's by human hands with no wetlands or back waters appears to me a greater hindrance to beavers headed up to higher elevations (Federal Land) than any trapper. The upper John Day was washed away for gold many years ago leaving bed rock and forcing the narrow fast moving river channels. I am no biologist but in areas beavers can thrive they do and years of human intervention and forcing drainage's to narrow controlled paths affect the beaver populations not fur harvest. No trapper I know removes populations to the point no furs will be available next year. It pains me greatly to see this action being looked at with no science behind the actions. Due to human use and miss of wetlands and flood plains is the issue here and how many people will give up there water front home for a beaver. The irrigation of farm land is needed for food and how many farmers would give up that good bottom ground and tear out dams for beaver. Instead you go after trappers to not allow one of the most enjoyable and oldest means of enjoyment. Trappers take special care of the environment and fur bearing populations and do there best to remove invasive species that wipe out bird and other species.

Jon Evans  
500 Fullerton Rd  
Echo Oregon 97826  
Brand # 3926A
I strongly support ENDING commercial and recreational beaver trapping and hunting on Federally managed public lands.
We know that beavers are a very necessary element in maintaining a healthy environment and they need to be protected so the beaver population can recover.
Sincerely,
Marge Popp
Dear Commission,

It has been brought to my attention that you are thinking of stopping beaver trapping on all public lands inside the State of Oregon to benefit the coho salmon. Is there any scientific proof this will help? I think not. I count 26 beaver closures in the trapping regs. One of these is the Ochoco National forest. It was closed about 1976 for a 5 year study. There has not been a study made that I can find, yet the Ochoco remains closed. Our beaver populations thrive through the State, due to responsible trapping and management. In my 52 years of trapping experience, I think it would a wise decision to appose this request and seriously look at going the other way and opening up the entire state.

Thank you
Jeff Comini
To Whom It May Concern,

This is to state that I am IN FAVOR of a ban on beaver trapping in Oregon. All trapping is barbaric, indiscriminate, and unnecessarily cruel. This is not the 1800s and there are many non-lethal ways to deal with "problem" animals. Thank you for your time.

Sincerely,
Kelly McAllister
Dear Commissioners,

Recently, I became aware of an effort to ban beaver trapping on Federal lands in Oregon. I strongly support this proposal, as beaver are a keystone species. Their activity, especially east of the Cascades is vital for restoring ecological productivity.

By slowing water run-off, they will improve hydrology which will have direct benefits for wildlife, and indirectly for the human economy. Instead of fighting over a diminishing pie, why not expand the pie?

Increasing wetlands and riparian areas will capture more carbon, greatly improve biodiversity and complexity and help fish and wildlife, including salmon and sage grouse.

Not only banning trapping, but actively aiding beaver expansion, including the use of beaver dam analogs would seem like a program that would bring many Oregonians together in support of ODFW.

Thanks for your consideration,
William Proebsting
Corvallis
To whom it may concern,

I am writing to voice my strong opposition to the proposed ban on beaver trapping on all National Forest and public lands. Beaver are an abundant, prolific animal who can engage in behavior that ranges at times from being a nuisance to causing tremendous damage. In those situations trapping is the most, and in many cases the only, effective means of control. There is no positive upside to this proposed ban and I urge that it be rejected.

Thank you for your consideration.

Gary J. Needleman
Roxann B Borisch

From: sskimmel@charter.net
Sent: Sunday, May 24, 2020 4:38 AM
To: 'odfw.commission@state.or.us'
Subject: beaver trapping  date:5/24/2020

To whom it may concern:

It has been brought to my attention that there is an effort in the state of Oregon to stop all trapping of beaver on national lands. To this I ask these questions.
1. For how many years or centuries has trapping beaver on these properties owned by the citizens of the United States been allowed?
2. Has beaver trapping in these areas since conservation laws have been in place to limit the annual harvest of these animals, has it in any way reduced population numbers to an unsustainable state?
3. Are not beaver and all other wild mammals, fowl, fish and amphibians etc. renewable resources and as such they each year produce young to repopulate those lives of their specie lost to death in the past year?
4. When you sit back and honestly answer the questions above, is it not true that beaver is not the real issue here?
5. Is not the real issue set in the way of the harvest, that being trapping?
6. Haven't the citizens of the United States saw the engineering expertise of the beaver, even under controlled circumstances of harvest and especially where no reasonable reduction methods of their population have been in place?

Please don't get me wrong the beaver is a beautiful and wonderful animal and I for one would never want to see its extinction from this planet. Yet when we humans do not utilize to the maximum our natural resources without endangering their existence, it is my belief we are doing nothing more than wasting that resource. Beaver if uncontrolled can damage untold numbers of private and public land acreage.
Please consider the above in making your decision. Thank you, Stan Kimmel Bellaire, Michigan  member Bellaire Conservation Club
Don't let this happen. Closing trapping is like doing away with the second amendment. Look back in history about trapping.
Hello, I am writing this message in favor of trapping on public lands. The beaver has been a problem without management from trapping in many areas in the past. It can cause damage to trees, streambanks, and also multiplies quickly.
To whom it may concern I am strongly against the closure of beaver trapping on National forest, monuments, parks and grasslands BLM land in the state of Oregon for the benefit of coho salmon. Efforts in other states have shown this to be ineffective. I have a interest in all National properties, I am strongly against any attempt of these closures. Thank you for your time.
Roxann B Borisch

From: adamus7@comcast.net
Sent: Saturday, May 23, 2020 8:37 PM
To: odfw.commission@state.or.us
Subject: ban on beaver trapping & hunting?

Honorable Commissioners,

I understand you will be considering a proposal to ban the commercial and recreational hunting and trapping of beaver in Oregon. I support such a ban. As a retired wetland scientist and former consultant to counties and state government on wetland issues, I am very accustomed to dealing with beaver concerns. And yet, times have clearly changed. There are now practical solutions in most situations where beaver cause problems for landowners. In addition, our scientific understanding of this species has grown and dispelled many of the old myths while providing fresh evidence of the net value of beaver activities to salmon and a host of other species. Should the ban be approved, the loss of agency fees from 161 beaver trappers and hunters is far outweighed by the many benefits beaver activities provide to other game and non-game species.

Sincerely,

Paul Adamus, Ph.D.
Corvallis
Hello,
Thank you for taking the time to read this. I visit the beautiful state of Oregon to visit family every summer, but unfortunately due to trapping on public lands we do not hike or enjoy public lands. We go to WA since trapping is not allowed on public lands. I know that there is a proposal to stop recreational and commercial trapping of beavers in Oregon, I urge you to please support this new proposal.
North America's threatened and endangered species rely on beaver created wetlands for their survival. Their protection is critically important keystone for many species in our national forests and public lands in Oregon and across the country. Please consider tourism, and Oregon wildlife.

Thank you again for your time,
Mari Freese
Roxann B Borisch

From: compassionforall@everyactioncustom.com on behalf of Olina St. Onge
Sent: <compassionforall@everyactioncustom.com>
To: odfw.commission@state.or.us
Subject: Ban Beaver Hunting and Trapping on Oregon's Public Lands

Dear Oregon Fish and Wildlife Commission,

I'm an Oregonian and I'm asking you to ban commercial and recreational (such an oxymoron!) permanently. Theses animals serve many purposes, including improving water quality. Their presence is vital in numerous ways. Stop allowing the senseless killing of these beneficial beings

Sincerely,
Olina St. Onge
Medford, OR 97501
compassionforall@msn.com
Dear Commissioners,

We urge you to approve the proposal to stop trapping of beaver for recreational and commercial purposes on National Forest and other public lands in your state.

Beavers are central to all life, including humans. They are critical to the success of healthy watersheds and species ranging from moose to songbirds, as well as the creation of natural firebreaks and overall healthy watersheds. 50% of North America’s threatened or endangered species rely on beaver created wetlands for their survival.

A trapped beaver is worth on average $10 out West. According to the BBC earth index a live beaver’s services to landscape and wetland management are worth $120,000 a year!

Lessening further the argument to continue trapping beaver on public lands, there are proven cost effective long term non-lethal tools that are being utilized to address conflicts with beaver when they do occur.

Given Oregon’s reported extensive drought like conditions, climate change, the forecasted higher risk to fires out West, and all the wildlife species that rely and benefit from beaver, isn’t now the best time as ever to discontinue trapping them on our public lands?

Thank you and please vote YES!

KC York
President/Founder
Trap Free Montana Public Lands

Utilizing the truths in trapping & promoting ethics, the best available science & responsible stewardship for trapping reform. We partner with our sister organization, Trap Free Montana, a 501-c3, educational charitable organization.

Trap Free Montana Public Lands, Inc.
PO Box 1347
Hamilton, Montana 59840
406-218-1170
www tfmpl org
I've learned that a proposal under consideration would ban all beaver trapping on all federal lands (National Forest, Nat. Grasslands, Nat. Monuments, Nat. Parks, and all BLM lands) in Oregon. This is a poorly thought out proposal which purports to be for the benefit of coho salmon. I am all for the restoration of salmonid stocks, including coho. But this is like taking the proverbial sledgehammer to a fly. The beaver populations of the northwestern United States, including Oregon, can sustain both trapping (wisely regulated) and coho salmon populations. I do not live in Oregon, but I visit it every couple of years. As a citizen of the United States who has paid federal taxes for sixty years, I have a vested interest in the federal land resources of Oregon. I am strongly opposed to a ban on beaver trapping on federal lands. It is simply not justified biologically. Rather, I think this is an attempt by those who have a "Walt Disney" view of animals as little humans in feathers, fur or scales--who hate trapping of beavers and are trying to outlaw it under the totally bogus pretense that it is necessary for restoration of coho salmon.

Respectfully,
Buford M. Myers III
641 S. 5th St.
Eunice, LA 70535
Dear Oregon Fish and Wildlife Commission,

Years ago I saw a video that showed beavers being trapped and drowned. Even now, when I hear about beavers being trapped, that image comes to my mind. It was awful.

I'm a second-generation Oregonian and proud to live in the "Beaver State." I request that you end commercial and recreational beaver hunting and trapping on federally managed public lands in Oregon, including national forests, BLM lands, national monuments, wildlife refuges, national parks and national grasslands.

Sincerely,
Sally Needham
Portland, OR 97224
sneedham@outlook.com
Hello,

I urge you to pass the proposed ban on commercial and recreational beaver trapping. Trapping a species so integral to the ecosystem will be looked at as completely ignorant and backwards by future generations and the sooner it ends the better!

Thank you.

Leon Werdinger
Leon Werdinger Photography
P.O. Box 463
Joseph, OR 97846
website: http://www.leonwerdinger.com
email: leon@leonwerdinger.com
A group of citizens, wildlife and fishery biologists, hydrologists, and others yesterday submitted a request to the Oregon Fish and Wildlife Commission to close all National Forests, Bureau of Land Management lands, National Monuments, Federal Wildlife Refuges, National Parks, and National Grasslands in the state of Oregon to commercial and recreational beaver trapping and hunting.

We want to add our support for this request. Beavers are very important for the ecology of an area. Their activity increases habitat for wildlife and mitigates flooding. Birds will find an additional safe area. Beavers are important for a balanced ecosystem. Commercial and recreational trapping is no longer desirable in our public lands.

Sincerely, Ann and Doug Brodie
May 22, 2020

Ed Minalia
301 East Main
Enterprise, OR. 97828
eminalia@gmail.com

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

Re: Amendment to OAR 635-050-0070

Dear Commissioners:

I don’t agree with the request to permanently close commercial and recreational beaver trapping and hunting in all National Forests, Bureau of Land Management land, National Monuments, Federal Wildlife Refuges, National Parks and National Grasslands in the state of Oregon.

I would like to see the data that supports that having beaver ponds would increase salmon populations. In my opinion beaver ponds are the best place to catch otter and mink that feed on steelhead, trout, and salmon. It’s a lunch room for them. The silt that is retained and has settled in beaver ponds will eventually wash the down the rivers and creeks due to breaching of their dams by heavy rains, and weather conditions. Also beavers will cut down trees along the riparian areas. But logging is not permitting in these areas. That would be an interesting study to see how increasing beaver dams and ponds will change the climate.

I live in Wallowa County and there have been six closures of rivers and creeks for beaver trapping for many years. Starting in 1964, the Minam river has been closed for beaver trapping in the National Forest for 56 years.
The following creeks and rivers have been closed for beaver trapping for 50 years: The Wallowa River, above the lake, the Lostine River, Hurricane Creek, {National Forest only}, and Bear Creek, (National Forest only). Pevine Creek, in the National Forest, there has been no beaver trapping allowed since 1986, that’s 34 years. I would like to see all the studies that have been completed on the increasing salmon populations by the closures of above.

The University of Oregon study indicated by eliminating all beaver trapping in our National Forest and the BLM will increase the Salmon population.

The Wallowa County beaver harvest report from 1990 to 2018 shows a decrease in beaver harvesting.
In 1990, 13 beaver were harvested in Wallowa County, Statewide 4250 In 2004, 25 beaver were harvested in Wallowa County, Statewide 2581 In 2010, 30 beaver were harvested in Wallowa County, Statewide 2749. In 2018, 13 beaver were harvested in Wallowa County, Statewide 1288.

With this amount of decreasing harvesting of beaver, in my opinion, there should be an increase in ponds and dams. The population of salmon should be soaring, due to the decrease of beaver being harvested. I don’t think the information coming from the Oregon State University is accurate. I believe this is just a back door way to stop trapping in our National Forest and BLM land.

Closing national forests and BLM land for beaver trapping is not the right thing for Oregon.

Sincerely,

Ed Minalia
Dear Oregon Fish and Wildlife Commission,

As a lifelong Oregonian, biologist and outdoorsman, I urge you to end commercial and recreational beaver trapping on public lands. You know, scientists have repeatedly proven and even casual observers can see the long-term benefits of beaver engineering to other wildlife and ecosystems.

It's understandable that some private landowners feel compelled to control beavers, but these essential animals should be allowed to contribute their valuable environmental services on public lands. Very few people enjoy hunting and trapping beavers while everyone appreciates and benefits from their role in the wild.

Now that the furbearer regulations are under review, this would be an excellent time to protect our state animal, at least on lands that belong to all.

Sincerely,
Chris Wille
Beavercreek, OR 97004
Chris@chriswille.net
To whom it may concern. Closing the beaver season is a big mistake. These kind of tactics do not work, causes more problems, and is just another method of taking people away from the outdoors, and in the long run takes money take from our natural resource management. Less licenses are sold, there is no harvest of the harvestable surplus, and beaver can set over populated in a hurry carrying a lot of disease in our waters. I ask you to drop this proposal. Larry Meyer

Sent from Mail for Windows 10
Hello,

I have trapped private and public lands in Umatilla and surrounding counties for years. The floods on the Umatilla river shows the importance of wet lands and cotton wood forests that need beaver populations in check.

The areas where beaver devastated the very few remaining cotton wood forests along this river caused large swaths of farm-able ground to turn to river gravel. The amount of farming pushes the beaver to the public land areas and destruction of the native wetlands. These days trapping land is very hard to get to and harder to get permission on private lands. To remove the ability to trap beaver on public land would be detrimental to new trappers starting out and reduce the ability to control beaver populations up and down river systems in Oregon. The Umatilla floods show the importance to control beaver populations on private and public lands because all trappers know today to leave some fur for next year. The problem is too many people and land use is exhausted on private and public land in just the 50 years I have lived in the Pendleton area just the amount of sage brush land turned to human use land has had a devastating affect on all animal populations except human. Please do not shut down trapping on public land.

Jon Evans
500 Fullerton Rd
Echo Oregon 97826
I object to closing trapping on Oregon public lands. I would like to know how this is directly related to the welfare of the coho salmon. It is a ploy by the anti-trapping movement to outlaw trapping on public lands and should be seen as nothing less, unless there is proof that the coho salmon is being affected negatively by trapping.

Respectfully,
John Carlson
CT trapper
Trapping is a necessary tool in wildlife management. So why is there someone allowing to mess with the trapper in a new area of the country. This is federal land and I think has a voter in this nation I also have a say. This trapping on federal or state land should not be band.

Sent from Mail for Windows 10
Dear Oregon Fish and Wildlife Commission,

My family lives in Oregon, affectionately known as the "Beaver State." We are writing to sincerely request that you end commercial and recreational beaver hunting and trapping on public lands. Beavers play a very important, crucial role in the fight against climate change and we need their critical skills -- dam building that improves water quality and traps carbon, help to provide homes for countless species, and behavior that mitigates the impact of climate change by keeping streamside habitats healthy.

An important part of our cultural and ecological landscape, beavers are crucial allies in the fight against climate change. For both their own benefit and the valuable services they provide to people and other wildlife, we request that you protect their lives. As part of your review and update of the state's furbearer regulations, we sincerely request that you end commercial and recreational beaver hunting and trapping on federally managed public lands in Oregon, including national forests, BLM lands, national monuments, wildlife refuges, national parks and national grasslands.

We can already see the impacts of climate change in Oregon in the frequency and severity of drought, wildfire and flooding. And we know that restoring riparian ecosystems will be crucial to mitigating those harms. But our current hunting and trapping policies hurt one of our most important partners in that restoration. Beavers build dams for their own benefit, but in doing so they create habitat for a host of other species. Scientists have shown that beaver dams also improve water quality, trap and store carbon, and could provide important groundwater storage for dry climates.

For all these reasons, I'm asking you to please close federally managed lands in Oregon to commercial and recreational beaver hunting and trapping, where these remarkable animals can provide the greatest benefit.

Sincerely,
Beth Redwood
Portland, OR 97217
redwood@comcast.net
When it comes to wildlife policy I abhor you to please make decisions based on science and reason. Public beaver trapping is a great asset for wildlife management and for trappers and landowners. Allowing the public to trap beaver is a cost effective alternative to having state funded agencies used to remove beavers for damage complaints and overpopulation. As is with all game animals, the public should have access to a sustainable harvest of the animals if they are meeting management objectives.

As for banning a specific method of take for a certain animal, this is not based on science but rather emotions and a mob mentality. Our North American model for wildlife conservation has proven to be the best and most reliable model in the world for managing wildlife. It is not based on some people’s emotions, but science. Nor is it based on an individual animal but what is best for all native plants and wildlife. Policy and laws should also be based on such principles, not the whim of ill informed or agenda driven votes. We should manage beaver trapping in the same way, and as it produces a net positive for beavers, landowners, trappers and odfw’s budget it should be considered a valuable tool for the long term sustainability of Oregon’s beaver populations.

The state of California has implemented such bans because of well funded agenda driven campaigns not based on science but beliefs. Bans on killing cougars and then all trapping. These bans have not resulted in reduced killing of cougars nor did it stop trapping but instead it simply made the state responsible for the cost and burden of removing conflict animals. The trapping and taking of cougar persists today, now funded by the people who voted for it to stop.

In the southeast invasive nutria were destroying entire mangrove ecosystems and the government depended on trappers to remove the invasive nutria. Without trapping the mangroves would have been lost along with the native wildlife inhabitants. similar disasters could happen here as we too have large populations of invasive nutria, without trappers and their Intimate knowledge of the ecosystems we could be left helpless against this invasive species. If beaver trapping is arbitrarily taken away from trappers it will be the first step in the extirpation of trappers. With the knowledge and skill Of trapping lost, who would odfw call to help battle the next invasive species? Where will odfw get the budget to fund their trapping program when landowners demand assistance? How did the emotion driven ban on hunting cougars and bear with dogs help odfw’s ability to manage wildlife?
I ask that you please remember what is best for Oregon’s public, wildlife, and ecosystems and keep responsible trapping of all kinds Available to the public.

Thank you for your consideration

Mike Shulters
Southern Oregon resident, hunter, business owner Sent from my iPhone