Roxann B Borisch

From: Jason Wisniewski <wisniewskijm@gmail.com>
Sent: Friday, May 22, 2020 10:19 PM
To: Odfw.commission@state.or.us
Subject: Petition to ban Beaver Trapping

Oregon Department of Fish and Wildlife Commission,

I am writing you to express my opposition to a recent petition to consider a prohibition of Beaver trapping on public lands in Oregon. My understanding of the petition is that the petitioner is arguing that Beaver dams and the Beavers that create them have been shown to enhance juvenile Coho Salmon habitat and therefore should not be harvested in order to maximize habitat and recovery of the species.

After researching this argument and Coho Salmon life-history requirements, I acknowledge that Beaver dams do appear to enhance juvenile Coho Salmon habitat under certain conditions. However, annual monitoring of this species in portions of it range has also documented that during low flow conditions, these dams may impede Coho Salmon movements and therefore isolate them from moving up or down their natal streams. In addition, these Beaver dams may pose a serious future threat to thermal conditions for the salmon in response to the warming trends associated with climate change.

Two Coho Salmon Evolutionary Significant Units (ESUs) in Oregon are listed as Threatened under the US Endangered Species Act. Despite the threats to these ESUs, Beaver trapping has been permitted both before and after listing of the salmon. Hence, Beaver trapping is currently permitted in the baseline management of these Coho Salmon ESUs. Although Beaver trapping is permitted, it may or may not occur at all of these Beaver ponds or occur every year. In addition, Beaver trapping in these ponds likely doesn't result in the complete local extirpation of this species and therefore the functionality of these ponds for juvenile Coho Salmon may be preserved. In contrast, prohibiting Beaver trapping could result in the expansion of these dams to an extent that could impede the salmon movement where they could have otherwise overcome these dams.

With this stated, I strongly encourage the Oregon Department of Fish and Wildlife to investigate the legal issues associated with prohibiting Beaver trapping as this would result in a change in a permitted wildlife management action that is part of the baseline management of the federally protected Coho Salmon ESUs. Because research has shown that Beaver dams will impede Coho Salmon movement under certain flow conditions, prohibition of Beaver trapping on these lands could result in additional "take" (as defined by the US Endangered Species Act) due to Beaver dams that would have otherwise been managed through regulated trapping and could have allowed Coho Salmon the ability to migrate and meet all life-history requirements for the species.

As a result of the complexities of this issue, the management of both Coho Salmon and Beavers should be based on the extensive experience and recommendations of the appropriate agency biologists overseeing these programs to ensure that their management is based on the best available science and expertise of the system. Therefore I recommend that the Oregon Department of Fish and Wildlife Commission oppose this petition to prohibit Beaver trapping on public lands and consider consulting with their agency staff to best manage and recover the wildlife resources of Oregon.

Sincerely,

Jason Wisniewski
I am in support of ending commercial and recreational beaver trapping and hunting on federally-managed public lands. Beavers can be quite useful ecological engineers and can result in many benefits. Types of benefits described by local beaver experts include the following: 1) new and better fish and wildlife habitat for many species including salmon; 2) expanded wetlands, wet meadows, and increased riparian vegetation will capture and store more carbon; 3) better groundwater storage and slower run-off will help alleviate municipal and agricultural water scarcity and lessen flooding, especially important due to climate change, and this will benefit both urban and rural populations; 4) beaver will create wildfire safe zones for wildlife and livestock on these public lands and wetter lands will quicken vegetative recovery after fire; and 5) fishing, hunting, and wildlife watching opportunities will improve with increased biodiversity and wildlife abundance.

I coordinated a film night and panel of experts pertaining to the showing of "The Beaver Believers" film on Feb. 14 at the Odd Fellows Hall in Corvallis. The local experts that described the multiple benefits above were instrumental in arranging a scientifically sound film panel that was quite knowledgeable. We had more than one hundred people in attendance, with strong support for promoting proven nonlethal solutions to beaver-caused problems by tapping into organizations devoted to helping land managers use them. Film attendees by a strong majority were in favor of much less trapping of beavers; instead they advocated for expanded opportunities for beavers to be allowed to function with ecosystems to provide multiple benefits. Our federal lands in Oregon are a very logical place for expanded beaver activities, which promises to offer many beaver-created improvements.

Sincerely,

Ralph Alig

Corvallis
I am asking the commission to dismiss the petition to stop beaver trapping. Trapping is a valuable management tool to control beaver populations which can be very destructive if left unmanaged.

Thank you
Jeremy Mason

Sent from my iPhone
Does anyone know when the tribes might let the Metolius arm of Billy Chinook and Simtustus lake open.
Commissioners, I am writing in opposition to a ban on beaver trapping on Federal lands in Oregon in an attempt to save coho salmon populations. This is a situation that begs for a study. One need only look to California where trapping has been banned for a number of years to determine whether their ban helped their salmon brook stocks, and spawning areas. There also was a study about 4 years ago by an OSU graduate student who attempted to reintroduce beaver into areas that had none. I believe, if memory serves, that 23 of the 25 radio tagged beaver were killed and eaten by mountain lions. Perhaps we are looking in the wrong place for a villain.

I urge you to vote no on a beaver trapping ban.

Sincerely, Paul Carlisle
99 N. 43rd Pl.
Ridgefield, WA. 98642

I am a former Oregon resident, and former secretary/treasurer of the Oregon Trappers Assoc. for 28 years.
Sent from Mail for Windows 10
To whom it may concern,

It has been brought to my attention that there is a proposal to ban beaver trapping on public lands in Oregon. As a citizen of the U.S., those lands are open to all people and proper wildlife management is necessary for healthy populations.

Because of the low fur prices here in Wisconsin, I've been hired for numerous beaver damage complaints. This has cost land owners and the state money to keep the damage to plants and flooding to a minimum.

A total ban would be detrimental to the ecosystem. Hopefully the wildlife agencies will see fit not to go ahead with this proposal.

Dave Hernke
Dear Oregon Fish and Wildlife Commission,

Beavers are an important part of our cultural and ecological landscape, and they're crucial allies in the fight against climate change. That's why I urge you to protect them — for both their own benefit and the valuable services they provide to people and other wildlife. As part of your review and update of the state's furbearer regulations, I request that you end commercial and recreational beaver hunting and trapping on federally managed public lands in Oregon.

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,
Jo Alexander
Corvallis, OR 97330
joa1313@comcast.net
Dear Oregon Fish and Wildlife Commission,

As an Oregon senior, I lived with beavers along both the Little Pudding River and the Luckiamute River. They are our original environmental defense team!

Beavers are an important part of our cultural and ecological landscape, and they're crucial allies in the fight against climate change. That's why I urge you to protect them — for both their own benefit and the valuable services they provide to people and other wildlife. As part of your review and update of 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.

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,
Ken and Pat Simila
Salem, OR 97301
similand@msn.com
TO: Oregon Commission for Fish an Wildlife Management  
FROM: Dave Hastings, Fur Takers of America  
RE: Rule proposal regarding banning beaver trapping on forest lands

Commissioners,

I would like to begin by stating that trapping is the most highly regulated form of wildlife harvest in the nation. I would add that on principle, most trappers, Oregon trappers included, are fine with that. We know how necessary good wildlife management is, and we understand the need to balance the process of managing of furbearers with concerns for the health and wellbeing of all Oregon residents.

What we do find ourselves alarmed about, with this potential ban on beaver trapping, is that science and data are somehow absent from the equation, and a value set has become the prime determiner.

We would urge you in no uncertain terms to please listen carefully to the array of Oregon Wildlife professionals. They are the scientists who we all hire to help us manage with data and science.

Failing now to listen to their recommendations would be akin to telling the state department of roads that they need to use a different gravel aggregate in constructing highway bridges, because a lot of people think it will make the roads prettier. We hire trained professionals to design bridges, and we hire trained professionals to scientifically manage our wildlife.

I am very comfortable in stating that I represent over 90 Chapters and Affiliates across the country, and that I am speaking collectively for them when I say please do not encumber an important wildlife management tool with such a blatant effort to support one value system at the expense of all others.

This is the opposite of public sharing of public land.

Sincerely,

Dave Hastings  
Fur Takers of America
Dear Commissioner,

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 ODFW 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 furtakers, depleting beaver colonies and preventing their dispersal to new areas of suitable habitat.

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

You must know that Beaver-created improvements will include things like:

New and better fish and wildlife habitat for many species including salmon.

Beaver create 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 fur take 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).

Please close all Federally managed lands to ANY type of Beaver trapping or hunting.

Thank you,
Saundra Holloway
Ashland, OR
Beavers create habitat, slow floodwaters, and raise water tables. As climate change continues, we should be increasing beaver numbers, not eliminating them.

Janet and Mark Thew
Bend
Dear Oregon Fish and Wildlife Commission,

I feel blessed whenever I discover the working contribution of a beaver on some stream or river here, in Oregon. It signals hope- for the land, the water system, the creatures in the river and for us, as humans. Beavers are the true re-creators- of the health of our ecosystem as they do the work of recharging the aquifer, re-establishing fish and invertebrate nurseries, and re-balancing the often detrimental impacts of humans and the commodity animals they raise. Because beavers provide great benefits to they land, they benefit us as well and it is absolutely NOT in out best interest as members of this holistic earth, to allow hunting of these wonderful creatures for any reason. To allow it for "recreational" purposes, or any other purposes is not how to respond when another has offered such wonderful gifts. Please expand your vision and understanding to see the gift of the beaver and stop all hunting of these amazing creatures. If these are really public lands, I, one member of this public, am adamant in my stand to stop all hunting of beavers.

Thank you,

Sincerely,
Gina Meredith
Bend, OR 97702
riverkids@hotmail.com
Dear Oregon Fish and Wildlife Commission,

I urge you to protect the beavers — for both their own benefit and the valuable services they provide to people and other wildlife. As part of your review and update of the state's fur bearer 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 grassland.

Please close federally managed lands in Oregon to commercial and recreational beaver hunting and trapping, so that these remarkable animals can provide their benefit.

Sincerely,
Joan Maiers
Lake Oswego, OR 97034
jmaiers@yahoo.com
Dear Oregon Fish and Wildlife Commission,

I recently retired to my first and last home, and I was horrified by seeing the impacts of climate change. It clear to me that restoring riparian ecosystems will be crucial to mitigating those harms. But current policies are making that difficult. The current hunting and trapping policies hurt one of our most important partners in that restoration, beavers. Beavers are an important part of our cultural and ecological landscape, and they’re crucial allies in the fight against climate change. These animals 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. That’s why I urge you to protect them — for both their own benefit and the valuable services they provide to people and other wildlife. As part of your review and update of the state’s furbearer regulations,

Sincerely,
Kathryn Tosney
Corvallis, OR 97333
ktosney@miami.edu
Dear Oregon Fish and Wildlife Commission,

I'm an Oregonian. It’s clear that Beavers are beneficial to the environment in many ways. Just the fact that they slow down water, allowing more water to move into the water table, and positively impacting the amount of rainfall are reasons enough to protect beavers. 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,
Daniel Salisbury
Ashland, OR 97520
dmobius@mind.net
Dear Oregon Fish and Wildlife Commission,

Hi I'm writing you urge you and your agencies to please protect the Beavers. Please stop trapping and hunting of the beaver.

Sincerely,
Denise Highfield
Grants Pass, OR 97526
highfieldinoregon@gmail.com
Dear Oregon Fish and Wildlife Commission,

I live in eastern Oregon. It's because of folks like you and your constituency that have ruined riparian habitat and caused floods throughout the region due to eradication of beaver from over trapping and hunting. I'm a federal forest service employee and am disgusted by this practice.

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,
Liana Aker
Mount Vernon, OR 97865
lianimals@hotmail.com
Dear Oregon Fish and Wildlife Commission,

Trapping is cruel!

Sincerely,
Lioba Multer
Florence, OR 97439
Imu93927@yahoo.com
Dear Oregon Fish and Wildlife Commission,

Please preserve beavers and their habitats. Humans cannot create the benefits of dams. Dams provide homes for other species, improve water quality and trap carbon., 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.

Federally managed PUBLIC lands belong to everyone in the state, and are not here for trappers and their individual greed.
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,
Mary Hinds
Wilsonville, OR 97070
marycooke1950@gmail.com
Dear Oregon Fish and Wildlife Commission,

I've lived in Oregon for most of my life and was surprised and appalled to learn that these beautiful and genius animals are hunted. Are you serious? Please end this nonsense on all public lands. And for private property, instead have concerned land owners get assistance from your commission on how to live with and benefit from them. Maybe you can do an educational campaign so the public will get behind them.

Sincerely,
Renée Schrock
Salem, OR 97302
renee.schrock@chemeketa.edu
I would like to voice my opposition to the closure of Beaver trapping. In the interest of time and space I won't go into reasons but just ask that you please use common sense. These type of closures end up doing more harm than good. Emotion should never be used to manage wildlife.

Sincerely, Robin J Powell
1322 locust street
Oakland, Oregon
97462
541-315-1937
Attached is my comments to the Commission on the proposed beaver trapping closure on the Siuslaw National Forest.

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

Subject: Proposed beaver trapping closure on the Siskiyou National Forest

May 22, 2020

My name is Michael Miller; I am a retired wildlife biologist having worked 30 years at the Gold Beach Ranger District, Rogue River-Siskiyou N.F. I have been personally involved in managing habitat on the 247,000 acre Gold Beach Ranger District which includes the lower Rogue River.

The Rogue River, from Graves Creek to the Pacific Ocean (85 miles), has been closed to beaver and otter trapping for over 30 years. In this time period there has been no noticeable increase in beaver abundance in the Rogue River or its tributaries.

I trapped beaver in the head waters of the Siuslaw and Smith River in the early 70’s where the Oxbow Ridge Fire of 1966 occurred. The entire fire area, including riparian areas was clear-cut salvaged. Beaver were plentiful high up perennial streams, even some steep gradient small (<6ft wide) streams because they had abundant early seral riparian habitat. The burn area was reforested with Douglas-fir which grew up shading out the deciduous hardwoods and forbs. Now the beaver population is low in this area because they do not have the food they require.

The Northwest Forest Plan (1994) gives direction to the Forest Service and Bureau of Land Management within the Range of the Northern Spotted owl (which includes all of western Oregon) on managing riparian habitat. It emphasizes high conifer tree composition for large wood development and high canopy closures for shading, both working against quality beaver habitat. It also includes no harvest zones on all perennial streams, which further limit restoration of previously clear-cut managed stands to develop beaver habitat. Fire exclusion has also resulted in overly dense conifer dominated forests.

The Northwest Forest Plan riparian management goals are managing stream vegetation outside the natural range of variability. Deciduous hardwoods are important for both beaver and fish. Hardwoods support many insects that provide important food for fish.

Areas closed to beaver trapping are also closed to otter trapping. Otters eat fish, in my opinion; closing beaver/otter trapping will increase predation on the fish species of concern. Question; Has closing otter trapping been consulted on with NOAA fisheries?

I’m opposed to closing beaver trapping on Siuslaw National Forest. Beaver trapping has very little to do with beaver abundance when compared to available quality beaver habitat. Emphasis should be on restoring beaver habitat by changing the current riparian management direction.

Thank you for your time,

Michael Miller
32435 Edson Creek Road
Gold Beach, Oregon 97444

Oxbow Ridge Fire Link : https://oregonencyclopedia.org/articles/oxbow_ridge_fire_of_1966/#.XscLvuTsYSk
Commission Email: Email: odfw.commission@state.or.us
Sent from my iPhone Good evening ODFW,
I am a constituent of Jefferson County, Oregon and I’ve learned animal rights activists are gunning for beaver trapping here in Oregon and are wanting to close it on all public lands.

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. This also 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 how trapping is done; rather they speculate and attack a humane contribution to keep this animal population under control. ODFW has other ways to enforce limits but to ban trapping of beavers is wrong. Please do not allow this.

Carol Govoni
2266 riverbanks Road
Grants Pass Oregon
It is being suggested that beaver trapping be closed on all National Forests, Bureau of Land Management lands, National Monuments, Federal Wildlife Refuges, National Parks and National Grasslands in the state of Oregon for the benefit of Coho Salmon.

Data from results of similar management tactics in other states have shown this to action to be ineffective.

As a US citizen, owning an interest in all national properties, I am strongly opposed to the possibility of these closures.

I would urge you not to succumb to the protestations of the anti-trappers on the benefit of closures. Their proposals are undoubtedly filled with emotion and broad statements of potential benefit and public good but have little to no actual scientific data to support their thesis.

Again, I am strongly opposed to the possibility of these closures.

Vicki L Schaur
US Citizen, Oregon Resident
May 22, 2020

Chair Wahl, Commissioners, and Director Melcher,

The Oregon Hunters Association strongly opposes the petitioned request to amend OAR 635-050-0070 as it pertains to where beavers (Castor canadensis) may be trapped within the state. The requested changes are overreaching and without the basis of true science.

While letters in support of this change may refer to scientific data, there is, in truth, no empirical data to support a ban on beaver trapping as an effective tool for managing the species or improving salmon populations. A similar ban was put in place in Washington with no favorable outcome to salmon runs after 20 years. Beneficial habitat conditions containing early seral forest successions are far more impactful on healthy beaver populations than the nominal number of beavers effected by trapping.

Beaver trapping closures in Wallowa County have been in place for over 45 years on USFS lands in the Eagle Cap Wilderness. During this time, ODFW documented very little change in the beaver population. Conifer encroachment on public land streams is considered one reason beavers have not increased significantly, along with predation pressure by a recovered contingent of predatory species over the past half century.

Trapping is an effective tool in the management of wildlife. To make large-scale changes to regulations and management practices involving over half the state without proven research and scientific evidence is not in keeping with ODFW’s history of science-based wildlife management policy. It is OHA’s recommendation that before any such change is undertaken, exhaustive research and scientific analysis should be conducted to address beaver population density, habitat considerations, predation, overall species health – and then decide if such a broad sweeping ban is, in fact, warranted.

OHA supports the ODFW staff, within both the wildlife and fish divisions, in their opposition to the requested changes. We support science-based management of Oregon’s wildlife, both game and non-game species. In the absence of this research, any broad-sweeping rules changes set the dangerous precedent of eliminating impactful management tools without clear scientific justification.

Sincerely,

Fred Walasavage
OHA Chair
Commissioners,
See attached.
Thank you for your consideration.

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Best Regards

Bill

Bill Marshall, Director Silviculture
Cascade Timber Consulting, Inc.
3210 Hwy
Sweet Home, OR 97386
541 367 2111 x230 O
541 409 1907 C
To Members of Oregon Department of Fish and Wildlife Commission

Sirs,
I have 3 brief points to make:

1) The notion that anadromous fish recovery is highly correlated with increased beaver population is flawed. At best it is a socially constructed idea with little basis in science.
2) The petitioner’s reasons behind restricting beaver trapping on the Siuslaw NF is likely an attempt to make inroads into restricting all trapping.
3) I understand Dr. Jimmy Taylor has been invited to speak on the issue during the upcoming Commission meeting. I urge you to pay close attention to him.

I urge you to reject the petition to ban beaver trapping in the Siuslaw National Forest.

Bill Marshall
Director Silviculture
Cascade Timber Consulting, Inc
Hi Michelle, I hope your week has gone well, thus far! I have attached a sign-on letter regarding the proposed furbearer regs from Humane Voters Oregon, Center for Biological Diversity, Predator Defense, Humane Society of the United States, Audubon Society of Portland, Animal Legal Defense Fund and WildEarth Guardians. Would you please confirm the receipt of the document and include it in the Commissioner's packet for the June meeting? Thank you and I hope you have a wonderful Memorial weekend!

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SAMANTHA BRUEGGER
Wildlife Coexistence Campaigner
She/Her/Hers

(970) 363-4191
www.wildearthguardians.org
Chair Mary Wahl
Commission Members
Oregon Fish & Wildlife Commission
4034 Fairview Industrial Drive SE
Salem, OR 97302


Dear Chair Wahl and Members of the Commission:

The undersigned organizations and our hundreds of thousands of Oregon members and constituents request that the Oregon Fish and Wildlife Commission modify the proposed 2020-21 furbearer trapping and hunting regulations to require a uniform minimum trap-check time of 24 hours.

Oregon lags far behind other states in establishing daily or 24-hour trap-check times. Daily or 24-hour trap-check requirements exist in California, Washington, Colorado, Arizona, and New Mexico. Oregon's current regulatory framework establishes widely variable trap check times for different categories of wildlife that range up to 168 hours between checks. This approach is inconsistent, inhumane, and out of date. Oregon is woefully behind on this issue; it is time for our state to catch up.

According to the rulemaking notice, only about 1,000 people in our state of more than 4,000,000 people (roughly 0.025 percent) trap and kill wildlife for its fur. The 24-hour trap check time does not prohibit trapping, but to the extent that it is argued that it will infringe on trapping abilities in some manner, the proposed 24-hour trap check time would affect a very small minority of Oregonians. Far more Oregonians object to the current trap regulations and the resulting animal abuse and unnecessary suffering.¹

Specifically, we urge the Commission to require that steel-jawed leghold traps, snares and conibear traps be checked at least once every 24 hours for all animals, including for predatory and game mammals. The Commission should also require trappers to post visible signs near the traps and set their devices at least 100 feet from public trails and other public premises for the safety of the public. It is imperative that trapping regulations minimize the death of non-target species, decrease animal suffering and bring Oregon closer to the modern regulations of neighboring states.

Trapping is Indiscriminate

Trapping is indiscriminate and causes the accidental death of numerous non-target animals, including imperiled and/or endangered species, along with domesticated pets. In 2018, dozens of individuals were accidentally trapped and killed in Oregon by the federal wildlife killing agency, Wildlife Services including beaver, bobcat, mountain lion, black bear, fox, raccoon, skunk, possum and various species of birds. The type and severity of injury caused by traps varies with factors such as the type of trap, the species trapped, outdoor temperature and weather conditions, and duration of time in the trap. Despite the unselective nature of traps, the long-term environmental impacts of trapping have not been systematically assessed.

Scientific research shows that both leghold traps and Conibear traps have a high potential for capturing and/or killing non-target animals. Field studies of the Conibear 120 Magnum (used to trap small animals such as minks and pine martens) have shown that non-targeted species constitute more than 73 percent of all captures. Other information shows that between 2 and 10 non-targeted animals are trapped for every target animal captured. Still other studies found that non-targeted animals constitute between 56 percent and 76 percent of leghold trap captures. The longer an animal is trapped, the more likely they are to self-amputate or die, but even being in a trap for a short time period can have devastating effects on target and non-target animals.

Trapping is Inhumane

Despite numerous modifications, most traps can cause serious injury and suffering, including broken legs, dislocated shoulders, lacerations, torn muscles, cuts to mouths and gums, broken teeth, fractures, amputation of digits, and death. An animal trapped on land may suffer from psychological stress and/or pain, starvation, dehydration, predation, or exposure to severe weather. If captured in aquatic traps, animals adapted to swimming and diving for long periods such as beavers and river otters can slowly suffer from hypoxia even if they struggle before drowning. Both the American Veterinary Medical Association and the American Animal Hospital Association oppose routine trapping primarily because of the injuries, trauma, and suffering inflicted upon trapped animals. Even padded traps can still cause serious and debilitating injuries. A 1995 study by Wildlife Services found 97% of coyotes caught in padded traps had severe swelling of their trapped limb, 39% had lacerations, and several had simple or compound fractures.

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Neck snares can also cause a very slow and painful death. Although trapper experience and expertise on the proper use and placement of snares is important in capturing animals properly, studies show that it is impossible to restrict captures to the neck area. Further, another study reported that of 65 snared coyotes, 59% were neck catches, 20% flank, and 10% foot. In this study, nearly half of the animals were still alive the morning after being snared. If found alive, wildlife can be killed in horrific manners in part to preserve fur and pelt intactness. Commonly used methods include strangling, drowning, bludgeoning and chest stomping.

The Conibear trap is a type of trap that is supposed to provide an “instant kill.” However, animals do not always die quickly in these traps—a quick death requires that an animal of a particular size enters the trap at a specific speed and direction. Research shows that animals in Conibear traps can die slow, painful deaths as their abdomens, heads, or other body parts are squeezed between the trap bars. The duration of pain until death or loss of consciousness varies, depending on where on the animal’s body the trap strikes and the force of the strike; traps cannot be controlled perfectly in the field. This tells us that the amount of time the animal is in the trap—even a “kill” trap—matters to the animal’s welfare. A 24-hour trap check requirement is a step in the right direction for Oregon’s wildlife, as Oregon trapping regulations are far behind other western states.

**Oregon Trapping Regulations are Lagging Behind other States**

Many states have adopted trapping limitations through the regulatory, initiative, and legislative process. Oregon needs to catch up to our neighboring states, and at a minimum we should require that trappers check their traps at reasonable intervals. To alleviate some of the suffering of trapped animals, the least we can do is require that traps be checked at least once a day.

Nearly half of all states already require a 24-hour or daily trap-check time, summarized below:

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<thead>
<tr>
<th>STATE</th>
<th>TRAP CHECK TIME</th>
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<tbody>
<tr>
<td>Arizona</td>
<td>Daily</td>
</tr>
<tr>
<td>California</td>
<td>Daily and only by authorized agents or employees</td>
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<tr>
<td>Colorado</td>
<td>24 hours and only under special circumstances</td>
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<tr>
<td>Washington</td>
<td>24 hours and only under special circumstances</td>
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<tr>
<td>New Mexico</td>
<td>24 hours</td>
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<td>Utah</td>
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<td>Wyoming</td>
<td>72 hours</td>
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<td>Idaho</td>
<td>72 hours (USDA Wildlife Services exempt from this rule)</td>
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<tr>
<td>Nevada</td>
<td>96 hours</td>
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<tr>
<td><strong>Oregon</strong></td>
<td><strong>168 hours (76 hours for situations not involving damage)</strong></td>
</tr>
<tr>
<td>Montana</td>
<td>No trap check time</td>
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A consistent 24-hour trap check requirement, including for predatory and game mammals, is a long-overdue step towards a modern, humane wildlife policy. Thank you for your consideration of our comments on the proposed furbearer trapping and hunting rule. On behalf of our organizations and our members, we respectfully urge your support for the long-overdue reform to trap-check times.

Sincerely,

**Brian Posewitz**  
Director  
Humane Voters Oregon

**Samantha Bruegger**  
Wildlife Coexistence Campaigner  
WildEarth Guardians

**Kelly Peterson**  
Humane Society of the United States  
Oregon Senior State Director

**Quinn Read**  
Oregon State Policy Director  
The Center for Biological Diversity

**Bob Sallinger**  
Conservation Director  
Audubon Society of Portland

**Brooks Fahy**  
Executive Director  
Predator Defense

**Jennifer Hauge**  
Legislative Affairs Manager  
Animal Legal Defense Fund
Greetings,
I'm writing to voice my concern with any and all plans regarding beaver trapping bans or any other trapping bans. The state of Oregon, ODFW, does not need to ban trapping or close forests. We have tried that before and I believe we currently have forests closed because of this or similar issues. Why? These are public lands.
I understand the need sometimes to regulate but banning trapping and closing forests is not regulating, it is controlling. The people of this state demand common sense approach to such issues and a complete ban is not it.

Thank you for your time and have a great day!
Don Watson
I was alerted to an attempt by outside activists to shut down beaver trapping in Oregon. Living in rural Oregon I am keenly aware of the damage unchecked beaver populations can do to productive land and infrastructure. The honorable and effective tradition of beaver trapping is a valuable part of Oregon’s overall wildlife and wildspace management. Oregonians have never known a time when beaver were not managed in this way so many have no idea the damage that can be done. Thank you for your time.    Dennis Manning
Dear ODFW
Trapping is a heritage of this state and beaver trapping was one of the corner stones that built this state and settled the west. Oregon is one of the last west coast states that recognizes trapping not only as a long lived tradition but also as a means of population control and food gathering. We as trappers take care of the land and we never want to see an animal completely wiped out we want to have old trap lines we can show our kids and grandkids how to set and watch them get their first beaver. With so much development public land like our national forests are some of our last frontiers where we can hike and scout discovering untouched areas that may not have been trapped since the Oregon trail. These are places we can connect to our past and know some of the struggles trappers before us faced. So I strongly encourage you to stand up with the Oregon trappers the Oregon sportsman and stand against the anti trapping crowd. Stand up for the freedoms and rights of the Oregon trappers and for the heritage that helped make Oregon the great state it is today keep beaver trapping open both private and public lands!
Sincerely,
Jarel Test Oregon trapper
To whom it may concern,

As a nuisance beaver trapper in Minnesota I know the importance of controlling beaver populations. In regards to fish populations controlling beaver populations is important especially for trout, salmon, and other stream species. That has been proven to benefit these fish species here in Minnesota by removing beaver on these streams.
To whom this may concern,

I have been made aware that there is a suggested ban on beaver trapping in much of the public land in Oregon state.

I have spent nearly my entire life in the outdoors and have seen first hand the impact beavers have on the environment. My father and I have also spent many years trapping wildlife pest removal and have witnessed the damage that even a few beavers can cause.

Beyond our own experiences studies have proven time and time again that regulated trapping is necessary to ensure healthy wildlife populations.

Not only is trapping needed to maintain a balanced ecosystem it is a heritage and age old tradition in North America, as well as a positive activity that can get our youth outdoors with their families.

In short I am very much opposed to the possibility of these closures.

Sincerely, Nate Benner
I am aware of a request that has been made to stop all beaver trapping on public lands&forests in oregon. This has been a proven ineffective management attempt used in other states for the benefit of coho salmon. These national forests,bureau of land mgmt lands,national monuments,parks&grasslands belong to and are for use by american citizens. I am strongly against the possibility of these closures in oregon or any other state sincerely Robert Johnson Fonda,n.y.
Please don’t stop beaver trapping in Oregon. It is an Oregon tradition and a great activity for kids, one of my friends’ teenage kids has been trapping and it’s awesome to see him loving the outdoors.

In a world of shrinking outdoor activities please don’t take this one away too.

David Johnson
Tillamook
503-201-4292

Sent from my iPhone
Hi,

I recently qualified as an Oregon resident, however myODFW account still registers me as a non-resident. I updated my residency in my account but it is still showing up as non-resident for me. What can I do for it to update?

Thanks
I support the continuation of beaver trapping in the Siuslaw National Forest. There are now at least 15 closed national forests or area closures within the state of Oregon, totaling 731 years of closures. These closures go back to 1955 and have not accomplished what they were intended to do and have never been looked into or studied for any benefit. I have trapped this area for 50 years. I want my grandchildren to be able to trap if they want to.
I am appalled that ODFW is considering allowing the trapping of beavers when beavers are integral to maintaining the ecological balance of our streams and habitat. It is absolutely unconscionable to even question their importance let alone be considering such an appalling course of events as to allow trapping and killing of beavers. As a lifetime Oregonian, I am angry at the constant chipping away of protections for our natural resources, wildlife and public lands to assist ranchers and hunters and other self serving individuals and activities. ODFW is supposed to be working to protect our public lands and wildlife and you seem to be doing an incredibly lousy job. I am so very disgusted with the incompetency of ODFW & I'm angry that taxpayers even have to write to appeal to your better judgement to do the right thing....this is a no brainer...protect the beavers and DO NOT ALLOW THEM TO BE TRAPPED AND KILLED!!!!

Kim Kahl, P.C.
State of Oregon Licensed
Real Estate Broker
Duke Warner Realty
1033 NW Newport Ave.
Bend, OR 97701
541-480-1662 Cell
541-385-3272 Fax
http://www.dukewarner.com/brokers/kim-kahl/
Dear Oregon Wildlife Commission Members,

Attached please find my letter pertaining to OAR 635-050-0070 related to commercial and recreational beaver trapping. I appreciate the opportunity to comment on this important matter before you.

Sincerely,

David Mildrexler
702 East Greenwood St.
Enterprise OR, 97828
Via Email: odfw.commission@state.or.us

May 20, 2020

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

RE: In Support of Requested Amendment to OAR 635-050-0070 related to commercial and recreational beaver trapping.

Dear Chair Wahl and Members of the Commission:

I’m writing to share this brief story of the joy and excitement that a beaver sighting brought my children. In late April of this year my wife and children were returning home and my daughter saw a beaver along Prairie Creek outside of Enterprise, Oregon. She exclaimed "Mom, I saw a beaver!"

She was quite surprised to see a beaver in this area, and of course the flat tail was the key to her identification. I am an ecologist. When a child sees an animal in its natural habitat, it presents wonderful opportunities for education. My wife and I have taken the kids camping near Vigne Campground on the Wallowa-Whitman National Forest with the goal of seeing beavers in Chesnimnus Creek, but we didn't see any on that trip. After seeing this beaver, Selah was so excited she asked if they could turn the car around to look for it again, which they did, although the beaver was gone. When I got home later that day, Selah was still totally enthused about having seen a beaver, and she rushed to tell me about her experience. It has been one of the wildlife highlights of the year and has come up in numerous family conversations.

Suffice to say my children could not comprehend that trapping beavers is allowed. It's interesting and difficult as a parent when there is absolutely no good explanation left for killing and removing animals of such critical importance to the future of ecosystems and people. Please, for the sake of future generations, the biodiversity of our planet, and for climate change resilience, stop the trapping of beavers as outlined in this request.

Sincerely,

David Mildrexler, PhD
Systems Ecologist
Eastern Oregon Legacy Lands
702 East Greenwood St.
Enterprise, OR 97828
Dear Chair Wahl and Members of the Commission:

Would you please consider my attached letter to the commission on behalf of the requested amendment to OAR 635-050-0070 as related to commercial and recreational beaver trapping.

Ralph Anderson
Retired: USDA Forest Service employee - 32 years
and NCASI and The Coot Company, Wildlife Biologist - 5 years
Wallowa, Oregon 97885
Via Email: odfw.commission@state.or.us

21May2020

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 related to commercial and recreational beaver trapping.

Dear Chair Wahl and Members of the Commission:

I've lived in Wallowa County, Oregon for some 50 years as a now retired wildlife biologist with a deep interest in the early days of this country. I have researched the journals of the Hudson's Bay Company (HBC) starting with the first overwintering factors with the Nimipuu at the mouth of the Clearwater River in 1811. HBC established a policy of creating "a fur desert" by destroying the beaver populations of the Snake River Country more for the political purposes of keeping American Fur Brigades out of the country than even making money out of the country. They had trouble getting the indians to trap the country as hard as they wanted it hit so they fielded their own brigades to strip the country clean. By 1827, they had pretty much accomplished their goal... in Wallowa country.

There is a stream, tributary to Swamp Creek, in Wallowa County that is named Beaver Gulch (L.A.McWorter 1927). It was named that by A.C Smith and Yellow Wolf because when the were delivering mail to early homesteaders and a sawmill on Crow Creek, they had to ride the lowest mile and a half up on the sidehill above the solid string of beaver swamps. Today, there are no beavers, the stream is a trickle through cow pastures with a road alongside it and downcut stream channels up to twelve feet deep through the old beaver-pond collected sills (there is no stone in the soil profiles). A beaver needs tennis shoes to get through that reach of ancient historic habitat, anymore.

The “history and tradition” of beaver trapping is not built on any model of sustainability but on politics.

The U.S. Forest Service had me doing wildlife and habitat impact surveys for timber sales in the vicinity of Thomason Meadows Guard Station, Wallowa County in 1976 and 1977. Traveling the main road across Zumwalt prairie in the upper Chesninnus Creek drainage (tributary to Joseph Creek) I would go by Fleenor Springs and the Steens Ranch on a regular basis as well as making a lot of "random meander surveys on the upper reaches of the drainages in the vicinity. I got a kick out of watching several active beaver dams(elevation 4600 feet) in Chesninnus Creek itself between the Steens Ranch and the cow camp just a mile downstream. I was curious what the beaver were subsisting on since the stream banks were typically denuded by ungulate grazing. There was little except some relict thinleaf alder (bitter) and black hawthorne (big thorns) and a little serviceberry (Amelanchier alnifolia), current (Ribes sp.). They seemed to be grazing streamside forbs a lot. I eventually found the highest beaver dam I had ever seen in that country on a finger of Thomason Meadows itself where livestock folks had dug a stock pond and high water had broken the
dam. Beavers had built a dam to repair the break in the earthwork dam (elevation 4600 feet). It was active when I found it and much of the dam structure was actually made of cuttings of lodgepole pine and Ponderosa pine which was the surrounding timber stands.

There was a relict willow carr at the foot of Thomason Meadows, between the uppermost dam and the larger dams downstream near the cow camp. I surmised that the up-stream dam might have been young beavers in dispersal trying to set up a satellite colony. There was still a notable shortage of real or good beaver food species on that upper reach. That relict willow car of about 1 acre was notable both for it's existence and it's age. It was contained inside a private in-holding fence where it was only used by a few horses during elk seasons. The beavers did seem to visit that willow patch regularly.

I made note of the species and currency of beaver cuttings as I came across them and particularly in 1977 and 1978 I often commented on the beavers working lodgepole pine along the stream between these sites (about 3 miles apart. Live lodgepole pine up to 12 and 16 inches dbh (diameter breast height). Lodgepole is not good beaver food... and likely I was observing starvation feeding by that colony. The impact of domestic livestock on the creek bottom, abundant elk and attendant whitetail and mule deer had both taken riparian deciduous species like willow, aspen and serviceberry down and were keeping it nearly non-existent. By 1979 the dams were broken by high water and not repaired. I surmised that starvation and/or the easy, road-side access for trappers had taken the beavers out.

Beaver habitat has been severely degraded by the historic and current use of public ranges by domestic ungulates/livestock.

s/Ralph G. Anderson
Retired Wildlife Biologist
USDA Forest Service 32 years
NCASI and The Coot Company 5 years
108 S. Storie St., Wallowa, Oregon
Please see the attached letter of support for the amendment to OAR 635-050-0070 related to beaver trapping.

Thanks for your consideration and be well all.

Terry Simpson
May 21, 2020

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

RE: In Support of Requested Amendment to OAR 635-050-0070 related to commercial and recreational beaver trapping.

Dear Chair Wahl and Members of the Commission:

It has recently come to our attention there is a request before the Commission to amend OAR 635-050-0070 as it pertains to where beavers (Castor canadensis) may be trapped within the State: Permanently close to commercial and recreational beaver trapping and hunting all National Forests, Bureau of Land Management lands, National Monuments, Federal Wildlife Refuges, National Parks, and National Grasslands in the state of Oregon.

As retired Wildlife Biologists from the Deschutes and Fremont-Winema National Forests, we strongly support this request. The great ecological benefit of beavers providing aquatic and riparian habitat has been explained in various letters to you. We support the co-signors on the Request letter and have chosen to take this opportunity to showcase the interconnected nature of beavers and the Oregon spotted frog (Rana pretiosa). The Oregon spotted frog was listed as threatened under the Endangered Species Act in 2014. One of the main reasons frogs were listed was due to the removal of beavers (Federal Register 79.168:51658. August 29, 2014). There is no recovery plan for Oregon Spotted Frogs yet. In our professional opinions, the beaver’s wetland engineering capability that provides the unique habitats needed for Oregon spotted frogs will surely be a foundation piece of that Recovery Plan. While beavers can thrive without Oregon spotted frogs, Oregon spotted frogs cannot fully recover and thrive without beavers. Most of the known Oregon spotted frog populations are on federal ownership. Suitable frog habitat is or once was strongly influenced by beavers. A trapping closure on federally managed public lands will help support the federal government effort to recover the Oregon spotted frog.

Here is a brief introduction to provide you with the basis of our support on behalf of the Oregon spotted frog. Joan Kittrell was a District Wildlife Biologist on the Chemult Ranger District on the Winema National Forest (4/96 to 9/2000) where she worked with her colleague, Wildlife Biologist Terry Simpson. In 1997 Joan and Terry began Oregon spotted frog surveys and monitoring work on Jack Creek in coordination/partnership with Mark Hayes (former Oregon Department of Fish and Wildlife Research, currently with Washington Department of Fish and Wildlife Research). Terry became the Chemult District Biologist until her retirement in 2012 and Joan became the District Biologist on the Crescent Ranger District, Deschutes National Forest, until her retirement in 2019. Terry continued working with interagency spotted frog experts and managers throughout the Klamath...
Basin. She also helped organize and operate the Klamath Watershed Partnership Beaver Management Team in the Upper Klamath Basin for seven years. Joan initiated Oregon spotted frog egg masses surveys and habitat restoration efforts on the Crescent Ranger District, Upper Deschutes Watershed.

Our collective experiences with Oregon spotted frogs have allowed us to put boots in the water at nearly every known Oregon spotted frog population in the Upper Deschutes and Klamath watersheds. We’ve seen first-hand how healthy beaver populations benefit the frogs. Conversely, we have also seen beavers removed, dam failures, dropped water tables and how quickly frog habitat and populations decline.

We know that beavers in a riparian can mitigate threats to Oregon spotted frog habitat by increasing the size of wetlands and connectivity between them, providing filtration for increased water quality, increasing water levels, reducing reed canarygrass invasions, and stalling plant succession. During our careers we designed and began implementation of several spotted frog restoration projects that included support for beavers by planting riparian woody species for beaver food and adding down wood structures to supplement dam construction.

One case in point is Big Marsh Restoration on the Crescent Ranger District in the Deschutes National Forest. Big Marsh is a high elevation marsh in a valley along Big Marsh Creek, a tributary of the Upper Deschutes River. The marsh was originally privately owned. In the 1950s it was ditched on two sides to drain it to extend the grazing season. In the 1980s the Forest Service acquired the marsh and began restoration. At first it tried to maintain the ditches, but eventually restoration put blocks in the ditches to force the water out. Beavers took advantage and built upon the blocks further extending water back into the marsh. However, beavers were frequently trapped out. From surveys and work done there we found beavers were historically present, but currently beavers are there on a cyclic basis. Just when the population of beavers seems to be returning they are trapped out and beavers are not seen in the marsh again for 2-3 years. We know from personal experience that if a frog restoration project area has snowmobile or road access, and beavers become established, it will experience trapping pressure. A beaver trapping closure on federal lands will help support the Oregon spotted frog restoration efforts being made.

The USDA Forest Service has taken restoration seriously and developed a Pacific Northwest Region Restoration Assistance Team (RAT). Forests and Districts regularly partner with ODFW, Rocky Mountain Elk and local watershed councils to fund stream restoration. In the last three years the team has gone international working with the Nottingham University, in Nottingham England to complete stream restoration and beaver reintroduction in the United Kingdom.

While we have illustrated the case of beavers providing for one threatened species, the case can be made for a number of sensitive species as well. The Forest Service sensitive species list is based on many factors, one of which is the Oregon State Sensitive species list. These lists are the red flags to prevent federally listing a species under the Endangered Species Act. Once a species is listed the state loses control of management of that species until it is sufficiently recovered. Maybe, just maybe, if beavers were common throughout the river systems, the Oregon spotted frog would not have needed to be listed.

Prohibiting beaver hunting and trapping on these federally managed public lands makes sense now for habitat and is an economical step in restoration of habitats and the species that use them.
Thank you for your time and consideration.

Sincerely,

Joan L. Kittrell  
Crescent Ranger District Wildlife Biologist (Retired)  
Deschutes National Forest  
LaPine, Oregon

Terry Simpson  
Chemult Ranger District Wildlife Biologist (Retired)  
Fremont-Winema National Forest  
Crescent, Oregon
To Whom it may Concern,

Please read my attached letter regarding the beaver trapping be closed on all National Forests, Bureau of Land Management lands, National Monuments, Federal Wildlife Refuges, National Parks and National Grasslands in the state of Oregon, for the benefit of Coho Salmon.

As a Oregon Resident, Sportsman and President of the Oregon Trappers Association, I am strongly against the possibility of these closures.

Doug Nichol
President OTA
Commission Beaver Letter

The Oregon Trappers with to express their distain and outrage over this unprecedented act of ignoring wildlife management and recreational opportunities to a group of Oregon outdoorsmen.

Historic closures for the protection of beaver have not been scientifically evaluated before being closed or at any time since the closures, which when added together for the 15 locations, total 731 years of protection in Oregon of the beaver.

Oregon Trappers would request this oversight be corrected before any other closures be added to this list and reevaluate positive results of existing closures to justify them.

It would be unethical to expand beaver protection at this time without a complete and broad based scientific study of all factors involved in beaver management. Other furbearers in Oregon recently have been protected without these types of studies being done before closures were approved.

The state of Washington has highly restricted beaver Trappers for over 20 years, please consider using their data on Coho number improvement before requiring Oregon Sportsmen to comply with requirements that limit management of beaver without data to support such new and extreme controls.

Beaver need managed in Oregon, just like every other furbearer, big game animal, and the rest of the state’s wildlife the Oregon Department of Fish and Wildlife controls, but it needs to be managed by a complete examination of all the factors that have a bearing on healthy populations, not a one size fits all blanket policy, please support your staff and their professional knowledge in this decision.
Chair Wahl & Commissioners,

I am pleased to hear ODFW is, at long last, considering some appropriate protections for beaver in Oregon. Commercial beaver trapping violates the North American Model that ODFW claims to adhere to. It is outdated and it is cruel. It stands in stark contrast to the mission of your agency. And it allows a very few to denude wild systems and degrade values from which all Oregonians benefit. ODFW’s mission is to protect and enhance fish & wildlife populations and their habitats for all Oregonians.

Growing up in and exploring the upper midwest, beaver were a major part of the wild corners of modified landscapes and the big wilds of the Northwoods where I began to gain a lifelong appreciation for wildlife, wild places, and natural systems. Whether it was the impressive dams, the ponds full of life and life-giving water, the slap of a tail on the water, or the sound of crying beaver kits late at night on a fishing trip, the presence of beaver added to the experience of being in the woods. Later in life, I learned just how important beaver were in more tangible and quantifiable ways. As the world changes, they are becoming ever more essential to increasing resilience of the natural systems that support all life.

I moved to the Beaver state about 15 years ago. I’ve taught outdoor education, am an avid hiker and wildlife watcher, and do wildlife monitoring and other field work as a part of my job. Since moving to the Wallowa Valley a little over 7 years ago, I have seen only two beaver in Wallowa County. Both were dead and in the back of trapper’s trucks. Both were heading out of the county.

As I understand it, this valley was known as a place of winding waters. In an otherwise dry landscape, I imagine the creeks were ever-changing and full of life. I imagine the precious water stayed here far longer than it does now. As the springs on our own farm are beginning to dry during part of the year and the water table is beginning to slowly drop, I am ever more convinced that it is time to start allowing some natural functions to play a bigger role.

It will be a long time coming before the straight ditches and increasingly piped and pumped industrial irrigation systems ever yield back to beaver here. But their legacy lives on in the rich soils that grow food for us, our community, and the guests who come here to enjoy the public lands and landscapes of Northeast Oregon. And, from time to time, I see a new beaver dam in an unexpected creek on our public lands. Each time, I see the place change and regain its life and diversity. And each time, I find just a little hope for a better future where we have learned from our mistakes and have begun coexisting with the life-giving natural systems on which we still rely.

More often than not, those new dams are gone within a year. Trapped out. The sream banks erode further under the trampling hooves of cows, willows are chewed down to the stem (and not replanted as beaver would do), and what once were verdant wetlands become thickets of lodgepole pine or seas of invasive grasses.

It's time to own up to past mistakes and start doing something different. The requested amendment to OAR 635-050-0070 is a good start.
Thank you,
Rob Klavins
Owner/operator of Barking Mad Farm, a B&B and working farm in the Wallowa Valley

PS - I am a conservation advocate, but in this case, I want to be clear that I am speaking personally and not on behalf of my or any organization
I am an American. As such I expect to able to trap on properties open to the general public. Unless there is a scientific reason (real and not imagined), behind the closure of beaver trapping, then please let me continue to enjoy the privileges provided to me by the sacrifices of so many patriots.
Roxann B Borisch

From: Wesley Murphey <wesmur@netzero.net>
Sent: Thursday, May 21, 2020 10:59 AM
To: odfw.commission@state.or.us
Subject: Petition to close Beaver Trapping (June Hearing)
Attachments: letter to odfw commission beaver trapping 5-21-20.docx

Categories: Forwarded to Wildlife

Dear ODFW commissioners,

I have attached my letter concerning the petition to close beaver trapping to be included for discussion at your June 2020 Furbearer hearing. Please acknowledge receipt.

Sincerely,

Wesley Murphey

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May 21, 2020

Commissioners
Oregon Department of Fish/Wildlife
odfw.commission@state.or.us

Dear Commissioners,

I understand that a petition has been put forward to you folks at ODFW to try to shut down all beaver trapping in the Siuslaw National Forest, and in fact, possibly all Oregon state forests and all national forests in the state of Oregon. I would like my letter to be included for discussion in your upcoming furbearer hearing in June.

I am an Oregon native (all 63 years of my life), author of eight books (including four Oregon outdoor books) and a trapper who made my living many winters trapping mostly water animals and specializing in beavers. I wrote the book "Conibear Beaver Trapping in Open Water: Master Beaver Trapping Techniques" and sold many articles to national trapping magazines.

Throughout my life, trapping and outdoor career, I have observed the wonderful value of beavers to the wild. However, in many areas they do significant damage. They cut down orchards and they dam up streams where the water then floods into areas where the water does damage to crops, trees or roads to name a few. Beavers also undermine some roads and areas along streams with their underground channels and tunnels. Like so many of Oregon's fur bearing animals, beavers are an abundant renewable resource. Beaver meat is excellent eaten in many different ways and, yes, their winter fur is amazing in its beauty and warmth when used in the global fur trade.

I have always been fascinated by the effect beavers have on nature. As stated in the article above, in many places they have a positive effect. No animal is as creative and industrious as the beaver. However, beavers do not live forever. As a steward of God's creation, I have no problem harvesting the surplus crop in a humane manner and benefiting from it.

Oregon's fish and wildlife department keeps a close eye on the beaver numbers throughout all of Oregon and sets its regulations accordingly. Since the early 1900s, when beaver seasons were closed for an extended period of time and many management actions were taken, beavers have thrived throughout much of Oregon, particularly on the west side of the state. The answer is not to close beaver trapping. The answer is to properly manage trapping seasons and areas in order to maintain a healthy, thriving beaver population. This way Oregon's beavers get to continue to enhance nature and waterways, while at the same time being properly controlled in order to minimize the amount of damage they do. And many Oregonians (as well as non-residents) get to enjoy seeing beavers or their activity on hundreds of waterways throughout the state.

Now I want to specifically address this present petition to close beaver trapping. It is my understanding that there are, or have been, over a dozen large areas closed to beaver trapping throughout Oregon's national forests and other areas. I don't know in many cases why those
areas were/are closed, but there better be some concrete science behind their closures. I know some areas were closed off to allow beavers to increase their ranges and numbers with the objective of having them build more dams, slow water down, etc., to enhance potential spawning grounds for salmon or sea-run cutthroat trout in coastal streams. Have/ did these closures enhanced the beaver populations and the potential spawning habitat for Chinook salmon and sea-run trout? Where is the documentation to prove that the closures did, in fact have that effect? What were the beaver numbers to begin with? What are they now? In any areas that are being proposed for closure, what are the current beaver numbers? What are the goal numbers? What exactly is the justified purpose of closing areas to trapping one of Oregon's abundant, renewable resources?

I personally believe the ultimate objective of the group putting forth this petition is to shut down beaver trapping throughout all of Oregon. Oregon's beaver population is in very good shape and therefore, Oregon's trappers should have the right to trap them.

The people behind this petition need to read the many sources describing Oregon's rich trapping history and the wonderful part the early beaver trappers had in it. I know this is not the day of the free-ranging unregulated fur trapper. We can all be thankful for properly regulated trapping now. As Oregon's Fish and Wildlife Department it is your responsibility to properly manage furbearer populations, in this case specifically, the beaver population. Please make your decisions based on sound science and do not allow further closures to beaver trapping and, in fact, consider re-opening areas that have been closed previously.

P.S. Please acknowledge receipt of this letter.

Sincerely,

Wesley Murphey

Author of these Outdoor Oregon books:

Blacktail Deer Hunting Adventures
Conibear Beaver Trapping In Open Water
Fish, Hunt and Trap (Volume One)
Fish, Hunt and Trap (Volume Two)
Roxann B Borisch

From: tony jonas <cotton45c@gmail.com>
Sent: Thursday, May 21, 2020 4:52 PM
To: Odfw.commission@state.or.us
Subject: beaver trapping

To whom it may concern,

Animal rights groups want you to incorrectly believe that a complete ban on beaver trapping on all National Forest and other public lands will singlehandedly and miraculously correct the multidimensional issues facing Coho Salmon populations in Oregon and across the west. I wish to firmly voice my respectful disagreement with the proposal to ban beaver trapping, using the support of scientific evidence, and recommend that you vote against banning beaver trapping in any area.

Beaver trapping is a regulated activity in Oregon which already allows for the scientific management of this keystone species by Oregon Department of Fish and Wildlife.

One only needs to look south to California to see that trapping bans will NOT correct Coho Salmon populations. For example, a 1998 ballot initiative in California banned leg-hold traps, conibear traps, and snares; thereby virtually eliminating the primary methods for beaver trapping. Yet, after 1998, scientific analysis of Coho Salmon populations across California reveals that their numbers did not miraculously or dramatically increase as a result of California's trap bans.

Therefore, scientific analysis of data available to date does NOT support an all-out beaver trapping ban to protect Coho Salmon populations. Please vote against banning beaver trapping, as trapping is already a regulated activity in the great state of Oregon. The bottom line is this: the push to ban beaver trapping is an animal rights initiative, not an environmental initiative.

Respectfully, Anthony Jonas
Chair Mary Wahl
Commission Members
Oregon Fish & Wildlife Commission
4034 Fairview Industrial Drive SE
Salem, OR 97302

May 14, 2020

Dear Chair Wahl and Members of the Commission,

I am a private land owner and farmer in Eastern Oregon on Eagle Creek, Baker county.

In the thirty years I’ve lived here we have had beaver come and go on our property. Eagle Creek is too big for beaver to make dams, but they have lived along the riparian area. I have read many an account of the hydrologic benefits of beaver and I welcome them where I live because of the role they play in the ecology of riparian areas, even if that role is not making dams.

Because of the situation we humans find ourselves in regarding potential water shortage due to climate change, increasing water usage as the demand for agricultural production increases, increasing domestic use as our population swells, and dwindling ground water retention, the very useful activity of beavers to ameliorate our human industrious activities should be employed since their ability to correct the situation is far beyond what we can do with as little disruption of the landscape.

Public lands seem the only option to carry out such an activity at the scale needed. I sincerely encourage you to approve this request of restoring beavers into the ecology of the public lands because we humans really can’t do as good a job at restoring the vital hydrologic processes our lands need to under go.

Respectfully,
Karen Riener
Richland, Oregon
i own western wi wildlife damage control. my name is dick quick eau claire wi.

i understand that Oregon wants to stop beaver trapping and what a trade y. since we are messing with the traditions of a normal livelihood for many, i don't see it right for those who don't understand trapping, to make a decision about others who need money to survive. to some people, money doesn't come in as easy as some broker on wall st.

don't destroy what is good for a few of us.

dick quick
Personally I don't believe you should stop beaver trapping! To some it is a family tradition, to others it is a way of making an income and to others a fun and fulfilling lifestyle! I fully disagree with making it illegal!
To whom it may concern,
It has come to my attention that there is a proposal to close beaver tapping on federally managed lands in Oregon to benefit salmon reproduction. Data from the results of similar management tactics has been proven ineffective. As a US citizen I am strongly against this proposal.
To whom it may concern,

It has come to my attention that it is being proposed that beaver trapping be banned on all National Forests, BLM lands etc...in Oregon, for the benefit of Coho Salmon. This is ineffective and is supported by studies in other states. As a US Citizen owning an interest in a National properties, I am strongly against these closures.

Fred Moyer
Chair Wahl and Members of the Commission:

Attached, please find comments from the Center for Biological Diversity in response to the Notice of Proposed Rulemaking for Furbearer and Hunting Regulations for the 2020-2021 and 2021-2022 seasons.

Please don't hesitate to contact me with any questions or concerns ahead of the June 12th Commission meeting.

Best,
Quinn

Quinn Read
she/her/hers
Oregon Policy Director
Center for Biological Diversity
qread@biologicaldiversity.org
May 21, 2020

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

Re: Furbearer Trapping and Hunting Regulations for the 2020-2021 and 2021-2022 Seasons

Dear Chair Wahl and Members of the Commission:

Please accept the following comments from the Center for Biological Diversity ("Center") in response to the Notice of Proposed Rulemaking for Furbearer and Hunting Regulations for the 2020-2021 and 2021-2022 seasons. In our review of the proposed regulations, we identified two key opportunities for the Fish and Wildlife Commission ("Commission") to advance wildlife and habitat conservation in Oregon. First, the Commission should take immediate action to restore riparian ecosystems by closing federally managed public lands to commercial and recreational beaver trapping and hunting. Second, the Commission should take an important step toward adopting a more humane and consistent approach to trap check times by exercising its current rulemaking authority to adopt a 24-hour trap check time for furbearers and predatory animals, and committing to work with stakeholders to amend and improve trap check times for all categories of native wildlife.

The Center for Biological Diversity is a national nonprofit organization with over 1.7 million members and online activists. We work to secure a future for all species, great and small, hovering on the brink of extinction. We do so through science, law and creative media, with a focus on protecting the lands, waters and climate that species need to survive.

We are ready to work with the Commission and Oregon Department of Fish and Wildlife ("ODFW") staff to accomplish these important actions. Specifically, we request that the Commission:

2. Modify OAR 635-050-0045 to require that traps for furbearers and predatory animals be checked every 24 hours.
3. Commit to working with stakeholders to amend and improve trap check times for all categories of native wildlife.
Banning Beaver Trapping on Federally Managed Public Lands

The Center requests that the Commission modify the proposed furbearer trapping and hunting regulations and close commercial and recreational beaver trapping and hunting on the following federally managed public lands in the state of Oregon:


Climate change is increasing the frequency and magnitude of droughts, wildfires, and unexpected flooding in Oregon – all of which comes at great cost to people’s livelihoods and to the health and abundance of fish and wildlife. Restoring stream and riparian ecosystems is crucial to mitigating the impacts of climate change in Oregon. Federally managed public lands are key to this restoration because they are a major source of water for agricultural and municipal use and provide vital intact fish and wildlife habitat to large areas of Oregon.

Public and private entities have invested a great deal of time and money on stream and riparian habitat restoration to improve water flows, watershed conditions, and species recovery. These efforts attempt to artificially reproduce what beavers do naturally. A more cost effective and ecologically sound approach would be to support active beaver colonies to enhance, expand, or maintain restoration efforts. Yet, Oregon’s current regulations continue to allow the removal of beaver colonies. The Commission now has an opportunity to ensure that its beaver trapping policies are in sync with the restoration efforts so urgently needed to mitigate the impacts of climate change.

The benefits of beavers on the landscape are well documented. Beaver dams and ponds adjust stream morphology and in-stream habitat in a variety of ways that are beneficial for many freshwater species, including waterfowl and federally protected mussels (e.g. Pollock et al. 2015). Removing beavers means fewer dams because of less dam-building and less maintenance of existing dams by beavers. Beaver dams in small streams often wash out during high winter flows, and beavers rebuild them the following summer (ODFW 2005).

Beaver dams create areas of deeper water than would typically be found in small streams, and impounded waters upstream of beaver dams cover much greater surface areas than the pre-existing stream channels (Naiman et al. 1986; ODFW 2005). As a result, beavers give streams a greater carrying capacity of fish (Hoffman 2013).

Additionally, beaver ponds and dams dissipate stream energy during floods or high flow events and create areas of slow moving or still water in an otherwise moving-water environment (ODFW 2005; Woo & Waddington 1990). By slowing water velocities and increasing water depth and storage capacity, beaver dams can contribute to groundwater recharge and thereby help increase summer low flows in streams (Leidholt-Bruner et al. 1992; Pollock et al. 2003).

By slowing river flow and retaining water at ponds, beaver dams can retain sediment, pollutants and nutrients so that the water quality downstream is improved and stream sediment load is reduced (Gurnell 1998; Rosell et al. 2005). As such, beaver dams can benefit downstream mussel populations (Campbell 2006).
Beaver ponds and dams also create complex shorelines and in-stream habitats [Naiman et al. 1988]. That complexity results in greater aquatic productivity—and thus more food for piscivorous wildlife—than stream reaches that do not have beaver dams [Leidholt-Bruner et al. 1992; Snodgrass and Meffe 1998; Collen and Gibson 2001; Pollock et al. 2004; Smith and Mather 2013]. Beaver dams also provide natural cover that is especially important for fish rearing sites (Reeves et al. 1989).

Several studies show that beaver ponds attract and support waterfowl. In Maine, McCall et al. (1996) found that ponds with beaver had higher numbers of Canada geese and mallards, and that many Canada geese used abandoned beaver lodges as nest sites. It is well established that wood ducks are often associated with beaver ponds (Carr 1940; Nevers 1968; Grover and Baldassarre 1995; Merendino et al. 1995; Haemig 2012). Other waterfowl are also benefited by beavers and harmed by their removal. In the Appalachian Plateau region of New York, hooded mergansers were found more often at active beaver ponds than at inactive beaver ponds or at the wetlands with no recent record of beaver occupation (Grover and Baldassarre 1995). When beaver occupied wetlands in Finland and their dam-building created flooding, the green-winged teal became more numerous (Nummi and Poysä 1997). Broods of the green-winged teal, mallard and goldeneye all foraged in beaver ponds as did juvenile green-winged teal and goldeneye (Nummi and Poysä 1995).

By closing federally managed lands in Oregon to commercial and recreational beaver trapping, the Commission can facilitate these beneficial activities of beavers where they will make the biggest impact. The requested changes apply only to the listed federally managed public lands. This preserves the ability of private landowners and state land managers to permit commercial and recreational trapping and hunting. Likewise, the requested changes do not prohibit efforts to remove beavers in response to damage on these federally managed public lands if non-lethal solutions to a conflict proved inadequate.

The current regulatory framework is inadequate and inconsistent. Current closures of public lands to beaver trapping are fragmented, inconsistent, and difficult to enforce. The proposed amendment to OAR 635-050-0070 would provide necessary clarity and consistency to the regulations and help Oregon realize the ecological restoration potential of active beaver colonies statewide.

**Adopting Humane and Consistent Trap Check Times**

The Center strongly endorses a standard 24-hour trap check time for all categories of wildlife. Oregon’s current trap check times are inhumane, inconsistent, and woefully outdated. Today, trap check times range from 48 hours to 30 days, depending on how an animal is defined in statute or rule. This approach imposes arbitrary suffering on different animals and is out of step with the majority of states that have adopted a daily or 24-hour trap check requirement. Oregon’s weak patchwork of laws and regulations causes terrible suffering to animals left in traps and poses serious threats to non-target wildlife, family pets, and public safety. We recognize that the Commission’s rulemaking authority to set certain trap check times is directed by statute. However, our request falls within the scope of the Commission’s existing authority. We also believe the Commission can and should support the broader reforms necessary to adopt a consistent, reasonable, and humane 24-hour trap check standard for all wildlife.

**Trap Check Times Subject to the Commission’s Authority**

Per the Notice of Proposed Rulemaking, the Commission is tasked with reviewing and adopting the General Furbearer Regulations set forth in OAR 635-050-0045. That review includes trap check times for
furbearers and predatory animals. As outlined below, the Commission may review and modify trap check times consistent with the parameters established by the legislature. The Center therefore requests that the Commission act within the scope of its authority to reduce trap check times for furbearers and predatory animals to 24-hours. By doing so, the Commission will take an important first step toward necessary reform.

The Commission’s authority to alter or set trap check times is directed by ORS 498.172, which provides:

(1) A person holding a license issued under ORS 497.142 (Fur-bearer trapping or hunting license and tag) may not set a trap for fur-bearing mammals without checking the trap at least once during each 48-hour period.
(2) A person may not set a trap for a predatory animal, as defined in ORS 610.002 ("Predatory animals" defined), without checking the trap on a regular basis.

The legislature set parameters for trap check times but deferred to the Commission to establish specific trap check times by rule. Notably, the legislature specified that traps set for furbearers must be checked at least once during each 48-hour period. This language affords the Commission flexibility to set trap check times lower than 48 hours. The legislature provided less direction regarding predatory animals, requiring only that traps be checked on a regular basis.

OAR 635-050-0045(11) sets trap check times for furbearers as follows:

All traps or snares set or used for the taking of furbearing or unprotected mammals shall be inspected at least every 48 hours and all trapped animals removed. This regulation does not apply to the taking of predatory animals.

OAR 635-050-0045(12), sets trap check times for predatory animals as follows:

Any person setting a trap for predatory animals, as defined in ORS 610.002, must check the trap as follows:
(a) For killing traps and snares, at least once every 30 days and remove all animals;
(b) For restraining traps and snares, at least once every 76 hours and remove all animals. However, restraining traps and snares set by a person owning, leasing, occupying, possessing or having charge of or dominion over any land, place, building, structure, wharf, pier or dock or their agent, and set for predatory animals damaging land, livestock or agricultural or forest crops, shall be checked at least once every 7 days.

The current regulations for furbearers and predatory animals are inconsistent, inhumane and outdated. Today, traps for predatory animals may go uninspected from 76 hours to 30 days. This causes captured animals to suffer greatly for long periods of time. Also, the longer traps are left without inspection, the more likely it is for non-target wildlife or other animals to be trapped and killed.

Under ORS 498.172 the Commission may set trap check times at shorter intervals. A 24-hour trap check time for furbearers is consistent with the statutory requirement that traps be checked at least once
during each 48-hour period. Likewise, a 24-hour trap check time for predatory animals is consistent with the statutory requirement that traps be checked on a regular basis.

We therefore request that the Commission exercise its existing authority and amend OAR 635-050-0045 (11) and (12) be modified as set forth below:

(11) All traps or snares set or used for the taking of furbearing or unprotected mammals any animal shall be inspected at least every 48 hours within no more than 24 hours of being set and then every 24 hours thereafter, and all trapped animals removed. This regulation does not apply to the taking of predatory animals.

(12) Any person setting a trap for predatory animals, as defined in ORS 610.002, must check the trap as follows:
(a) For killing traps and snares, at least once every 30 days and remove all animals;
(b) For restraining traps and snares, at least once every 72 hours and remove all animals. However, restraining traps and snares set by a person owning, leasing, occupying, possessing or having charge of or dominion over any land, building, structure, wharf, pier or dock or their agent, and set for predatory animals damaging land, livestock or agricultural or forest crops, shall be checked at least once every 7 days.

The Center requests that the Commission modify the trap check times for furbearers and predatory animals now as a first step to adopting a 24-hour standard for all wildlife.

Supporting a 24-Hour Trap Check Standard

The Center believes the Commission’s leadership is crucial to achieve a consistent, reasonable, and humane 24-hour trap check standard for all wildlife. Trap check times in Oregon are governed by a complex set of overlapping statutes and regulations. We recognize that the Commission cannot act alone. Reform will require coordination among the Commission, legislature, and interested stakeholders. However, as the decision-making body charged with formulating programs and policies concerning management and conservation of fish and wildlife resources and establishing seasons, methods and bag limits for recreational and commercial take, it is critical that the Commission step up and demonstrate its commitment to these needed reforms.

Thank you for the opportunity to provide comments. We appreciate your time and consideration and would be happy to provide further details upon request.

Sincerely,

Quinn Read
Oregon Policy Director
LITERATURE CITED


As a former government trapper I would like to point out that we did a lot of beaver work for county and state road departments. Prepare for flooded and washed out roads. We the people created this ODFW agency to help manage our resources. As with any ABC agencies created with good intentions they always become draconian and turn around and falsely create power, not delegated to them then use this false power to remove the rights of the people that created them. Stop and think for a second.... Have you ever left for the weekend and put the trust of your home and pets in the responsible hands of a friend or relative only to find upon your return that while you were gone they sold your home and pets and forced you off your own property? HELL NO! Because you did not give them that authority!!! Wake up, people!! Fire and or arrest these criminals for violating their oaths and working outside of their delegated authorities. Oregon department of fish and wildlife did not represent oregonians well at all during the measure 18 campaign back in the nineties to ban bait and hound dogs for a bear and cougar hunting. Look where that got us to day. Oregon department of fish and wildlife did not stand up and present their expertise and science out of fear of taking sides during that campaign. They failed at managing our resources once again. If Oregon department of fish and wildlife is going to continue to function And exist then it needs to do so in a constitutional manner Or it needs Be deconstructed. They are mismanaging our wildlife and charging us ridiculous amount of money to do it. They are managing us out of our public resources rights and our property rights. As private property owners we have the right to protect our property And that includes damage From animals that we the people own as a collective. I'm trying to be As a respectful and polite as possible but I often only know how to be Blunt. Do the jobs that we the people hired you to do (Protecting our rights and resources So that we can continue to use them as our creator intended) Or we the people will give you your marching papers. Stop kow towing to the leftist Globalist agenda And go back to working for the people. We the people created your Hired positions and we the people can also eliminate them.
To whoever is considering this,

This is a terrible idea. To think that will help the salmon is a dream. I have seen this first hand in Alaska out in the wilderness where there was no trapping of beavers they had completely damned a river so the salmon could not get past it. Fish and game was concern that if it was not opened up it would completely kill this salmon run, because of how small of a river and how close to the salt it was. Beaver left unmanaged will be a problem you will end up wasting your money and resources on. Plus all the flooding it will cause. Please Do not consider this a option to helping your salmon runs.

Thank you. jesse
Good evening ODFW,
I am a constituent of Jefferson County, Oregon and I’ve learned animal rights activists are gunning for beaver trapping here in Oregon and are wanting to close it on all public lands.

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. This also 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 how trapping is done; rather they speculate and attack a humane contribution to keep this animal population under control. ODFW has other ways to enforce limits but to ban trapping of beavers is wrong. Please do not allow this bill to pass.

Respectfully,

Lori Courtney
P.O. Box 1111
Warm Springs, Oregon 97761

Sent from my iPhone
From: Stephen watson <watsonstephen7@gmail.com>
Sent: Thursday, May 21, 2020 8:32 PM
To: odfw.commission@state.or.us
Subject: Beaver trapping

I'm writing you today in regards to the thought of no longer being able to trap beavers. Personally this is absolutely unreasonable to me. As beavers are not trapped for sport, generally speaking, any longer. I have to say that I am truly opposed to this idea and think it's a step in a very wrong direction. Please for the sake of the trapping industry as a whole do not put restrictions on any trapping.

Thanks, Stephen, a concerned Oregonian.
To whom it may concern,

Animal rights groups want you to incorrectly believe that a complete ban on beaver trapping on all National Forest and other public lands will singlehandedly and miraculously correct the multidimensional issues facing Coho Salmon populations in Oregon and across the west. I wish to firmly voice my respectful disagreement with the proposal to ban beaver trapping, using the support of scientific evidence, and recommend that you vote against banning beaver trapping in any area.

Beaver trapping is a regulated activity in Oregon which already allows for the scientific management of this keystone species by Oregon Department of Fish and Wildlife.

One only needs to look south to California to see that trapping bans will NOT correct Coho Salmon populations. For example, a 1998 ballot initiative in California banned leg-hold traps, conibear traps, and snares; thereby virtually eliminating the primary methods for beaver trapping. Yet, after 1998, scientific analysis of Coho Salmon populations across California reveals that their numbers did not miraculously or dramatically increase as a result of California’s trap bans.

Therefore, scientific analysis of data available to date does NOT support an all-out beaver trapping ban to protect Coho Salmon populations. Please vote against banning beaver trapping, as trapping is already a regulated activity in the great state of Oregon. The bottom line is this: the push to ban beaver trapping is an animal rights initiative, not an environmental initiative.

Respectfully,

Travis J. Klotz
To Whom It May Concern,

As an avid outdoors woman in Wyoming, it saddens me to see trapping heritage taken away in any state. There is a need for wildlife conservation on public as well as private lands. Many private lands already don’t allow hunting or trapping. Trapping and hunting is essential to maintain healthy populations and a healthy ecosystem. If you allow activists to win the fight against beaver trapping on public lands, that’s just going to act as leverage for them to get rid of hunting and trapping completely. Starvation and disease is mother nature’s way of taking care of overpopulation. As an ethical hunter and/or trapper, you respect the animals you kill and use as many pieces of them as possible so that they may help you sustain life even after their death. As stewards of the land, we need to take that into consideration when deciding something this important. Please use common sense and science in your decision. Don’t appeal to the emotional side of the activists trying to take away our freedom and heritage.

Thank you for listening to my concerns.
Sincerely,

Sara Banning
Powell, Wyoming
307-250-3798
sassy_showstock_wy@yahoo.com

Sent from my Verizon, Samsung Galaxy smartphone
I believe attempting to close beaver trapping in Oregon is another attempt by anti-trapping groups to gain their agenda under the premise of benefiting a particular wildlife species with little or no scientific evidence of such a benefit.

Eliminating trapping would remove a valuable tool for those in charge of managing our natural resources as a whole for the benefit of the environment and the people who are the owners of these public lands.
Greetings commissioners!

My name is Carl Berg. I am a trapper and opposed to the proposal of a beaver trapping closure on the Siuslaw National Forest.

If I may be so allowed I would like to let you know what my "street creds" are on the subject:

First off, I authored the segment of the 2012 Oregon Furbearer Report on the history o’ beaver relocation efforts in Oregon (with assistance from Tim Hiller, the then Carnivore-Furbearer coordinator).

At about the same time I collaborated with a coastal beaver genome study directed by Vanessa Petro (Senior Faculty Research Assistant & Wildlife Biologist, Oregon State University). As a trapper I helped supply genetic material from beaver populations from coastal counties including Coos up to Lincoln.

I also am an an organic farmer in the Long Tom watershed that has been growing sustainably since 1980 and whose farm has been certified "Salmon Safe" for the last 12 years. I only mention this so that you know that sustainable harvest is important to me and applies to both of my vocations.

Most importantly, I have likely trapped more beaver on the central Oregon coast than any other trapper in the last 35 years. Which I think qualifies me to be considered at the very least, a keen observer of beaver and their populations in the area of concern.

All of my trapping is by boat which means I trap lakes and tidewater on the coast. NOT THE UPPER TRIBUTARIES SO IMPORTANT FOR COHO HABITAT. Where I trap beaver dams are never seen. I know that my trapping efforts have had zero effect on beaver numbers in the areas we would all like to see more beaver ponds in. In truth my trapping efforts help to maintain a healthy disease free beaver population on the lower rivers.

As many of you may already know, beaver prices have been at all-time lows the last decade and the annual harvest is a small fraction of what it was back when coho numbers soared 30--45 years ago. Trappers are not hiking into the upper tributaries to trap an animal whose pelt is only worth $9-10.

I want to emphasize to you that trapping is having no effect whatsoever on beaver numbers in the sensitive areas of the national forest. If there are no beaver there it is because the habitat is not suitable (stream shading) and also because of the build up of large predator numbers since the ban on hound hunting. I have discussed these facts with various furbearer biologists who completely agree with that view. As you know, I cannot recite their names as per their need to remain impartial.

I would hope that to the proponents of the closure would fall the burden of proof that a trapping ban could boost beaver numbers in the sensitive areas. I know that none exists.

And in the total absence of empirical scientific data we should hesitmate to legislate. If anecdotal information is to be used in the absence of science, I urge you to consider mine. Someone with firsthand knowledge of the subject matter.

Thank you for taking the time to read my letter.

Sincerely,

Carl Berg

Oregon Trapper Lic # 8735
To whom it may concern,

The argument to end beaver trapping under the guise of protecting Coho Salmon populations is a FALSE argument that is not supported using unbiased scientific data.

Fact #1: California's salmon populations are also failing even though the state virtually banned all public beaver trapping when they outlawed almost all methods of trapping beaver in 1998, and California's salmon populations did not rebound after the 1998 trap bans.

Fact #2: The 1960s saw substantial salmon populations in California, even though beaver trapping was occurring in greater frequency before that time, and with the consistent fall of trapper numbers in California over the past quarter of a century, Salmon populations have NOT inversely increased as a result.

Fact #3: Removing trapping as a management tool for beaver populations conflicts with the science-based North American Wildlife Conservation Model, which is the foundation for maintaining the healthiest and most successful wildlife populations in the world. Beaver trapping is already an activity regulated by Oregon Department of Fish and Wildlife, and has been managed successfully without a beaver trapping ban on public lands.

Fact #4: Trappers do not want to eliminate beaver populations from the Oregon landscape but want to work alongside other conservationists to maintain healthy beaver and Coho salmon habitat for the benefit of Oregon's environment and for the continued sustained use of wildlife resources.

Fact #5: If this push to ban beaver trapping was actually about protecting the Coho salmon population, this would be a part of a multifaceted push for: widespread dam removals; fish passage constructions at existing dams so Coho could access the thousands of miles of stream habitat that is blocked off by all of the dams across the state; livestock grazing bans/restictions along streams and rivers used by Coho salmon; commercial ocean fishing bans/restictions; greater restrictions against timber companies to leave larger stream buffers and willow plantings at log
ging sites; increased sea lion removals; more Coho reintroduction programs to seed streams that don’t have any Coho. Please do not misunderstand me - I am not advocating for all of these things within my letter, but merely pointing out each of these things to show how the push to ban beaver trapping is really an animal rights initiative and not an environmental initiative to address the multifaceted issues that Coho salmon face.

In summation, the above facts refute the FALSE argument that banning beaver trapping on public lands in Oregon will protect and save Coho salmon populations. The push to end beaver trapping in Oregon is an animal rights initiative, NOT an environmental initiative, and this push is not based on unbiased scientific analysis of all data available to date. Please vote AGAINST any beaver trapping ban.

Respectfully,

D. Steintl
I feel this is a “feel good” measure with no scientific rationale. Trapping beavers responsibly ensures a consistent, regulated population and provides sport, fur and food for thousands of outdoors-people who also pay the state for a trapping license. Please reconsider this measure. Thank you.
Sent from Mail for Windows 10
It is essential to continue to control all beaver populations on public and private land everywhere in our country. It is a necessity to allow trappers to continue to help control these populations.

Sincerely,
Kevin Schumann
Hello,

I am writing to voice my opposition to the measures being considered that would stop beaver trapping on some federal lands in Oregon.

The effects of cessation of beaver trapping on Coho Salmon are unproven at best and ineffective at worst. The effects of uncontrolled beaver populations are very much proven.

As a stakeholder in Federal lands I believe the forced stoppage of activities as important as beaver trapping for management of ecosystems and as a top notch source of renewable, organic, and all natural protein, should not be considered when the results are unproven.

Thank you,
Christopher Willhite
From our experience with beavers here in the south, I think you will be sorry. Trapping is a necessary management tool that you need to have available to control damage to timber, roads, and any private property that will be damaged by flooding. I understand that even stream fisheries can be damaged by beaver impoundments.
Good evening ODFW,
I am a constituent of Jefferson County, Oregon and I’ve learned animal rights activists are gunning for beaver trapping here in Oregon and are wanting to close it on all public lands.

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 perseverence. This also 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 how trapping is done; rather they speculate and attack a humane contribution to keep this animal population under control. ODFW has other ways to enforce limits but to ban trapping of beavers is wrong. Please do not allow this bill to pass.

Respectfully,

Lisa Johnson
2929 S Adams Drive
Madras, Oregon 97741

Sent from my iPhone
Any potential closure to trapping hunting or fishing should solely be based off of population numbers. As in rising declining or stable populations Of the species affected. There should be a lot of Legitimate studies Done on the issues at hand before any decision is made. And furthermore a petition on a subject like this should be absolutely dismissed and ignored and all decisions made Should be made off of evidence and not people's feelings.

I hope you take my words into consideration on the upcoming furbearer hearing. Thank you for your time Daniel Emberton.
Dear Chair Wahl and ODFW Commission Members:

Please find attached my email regarding the requests to ban beaver trapping on federal lands that the Commission has recently received from various sources. I respectfully request that the attached email be made a part of the Commission’s meeting packet for any upcoming meetings on Coho Salmon and beaver trapping.

Thank you for your anticipated courtesy and cooperation.

William J. Hansen
P. O. Box 272
Walterville, OR 97489
541-954-7554
May 21, 2020

Mary Wahl, Chair  
Oregon Fish & Wildlife Commission  
Congressional District 4

Gregory J. Wolley  
Oregon Fish & Wildlife Commission  
Congressional District 3

Jill E. Zarnowitz  
Oregon Fish & Wildlife Commission  
Congressional District 1

Mark Labhart  
Oregon Fish & Wildlife Commission  
East of the Cascades

Becky Hatfield-Hyde

Robert Spelbrink

Oregon Fish & Wildlife Commission  
Congressional District 2

Oregon Fish & Wildlife Commission  
Congressional District 5

Dear Chair Wahl and Commission Members:

I am writing to you as a concerned citizen of Oregon regarding the requests that the Fish and Wildlife Commission has recently received to close beaver trapping on all national forest lands, BLM lands, national monuments, federal wildlife refuges, national parks and national grasslands in the state of Oregon which comprise approximately one-half of Oregon’s land mass including thousands of miles of rivers and streams. It appears that the parties submitting these requests have developed some erroneous understanding about the connection between beaver populations and Coho Salmon populations. It is my understanding that staff of the Oregon Dept. of Fish & Wildlife is opposed to all of the requested closures based on their scientific studies and first-hand experience, something that appears to be lacking in the requests from the various environmental groups. The Commission would be remiss to disregard the professional opinions of their professional staff and trappers who have years of experience and education relating to the management of wildlife in Oregon.

Many factors come into play in the decline in Coho Salmon runs, such as predation on all ages of Coho, environment and habitat considerations, as well as ocean conditions.

In researching the declining beaver population in some parts of Oregon, there are also many factors affecting their numbers such as the reduction of logging and the requirement to leave buffer strips along streams which eliminated the conditions for brush and deciduous trees to thrive, both of which make up the diet of beavers. Historically, logging created an open canopy which allowed the establishment and growth of deciduous forage for the beaver. The predation of beavers needs to be taken into consideration. Mountain lions are one of beavers’ most common predators and with the soaring population of mountain lions in Oregon, it is not surprising to see a decrease in beaver numbers. A 2015 study by Petro, Taylor and Sanchez found a 47% survival rate of transplanted beaver with almost 60% of all mortality caused by predators. It makes sense that transplanted beaver would have higher mortality rates than the normal population but this study shows that the main cause of mortality is predation, clearly showing that predators have a large affect on all beaver populations, likely a larger affect than trapping.

Before making any decisions regarding closing areas to beaver trapping in Oregon, there needs to be some long term detailed scientific research on both the Coho Salmon runs and the beaver population. It would be irresponsible to implement further closures on beaver trapping areas in Oregon without conducting such research. The importance of being good stewards of Oregon’s natural resources cannot be emphasized enough. Proper management decisions are imperative and must be made on solid scientific research, not based on emotional arguments from special interest groups. These groups repeatedly demonstrate that they base their requests to ban beaver trapping only on information they find which affirms their opinion rather than proven scientific information.

I hope that you will carefully consider the points I set forth above and that the Commission will endeavor to ensure that your decision will help to responsibly manage wildlife in Oregon and mitigating property damage inflicted by some wildlife species. Thank you for your consideration.

Respectfully submitted,

William J. Hansen  
P. O. Box 272  
Walterville, OR  97489
Attached is a letter to the commission concerning beaver closures.

Jim Soares
jims@eoni.com
Cell 541-805-5194
Oregon Fish and Wildlife Commission

Before you on the Fish and Wildlife Commission are several requests to close beaver trapping. If all these requests are approved by the commission it would close beaver trapping on approximately one half of the land mass of Oregon and on thousands of miles of rivers and streams in the state. There is no empirical data that supports these closures and therefore the ODFW staff is opposed to all these closures. The main reason touted for these closures is the thought that ending beaver trapping would help Coho Salmon runs. This a complex issue with many factors that need to be assessed, including predation (on both smolts and adults), environmental and habitat considerations, and ocean conditions. This issue becomes even more complex when you begin to look at the factors that affect the beaver. Many scientists now believe beaver numbers have declined as a result of lack of logging and the practice of leaving buffer strips along streams. Logging opens up the canopy and allows early seral forest succession providing deciduous forage for beaver. Another consideration needs to be predation on the beaver. A recent study (Petro, Taylor and Sanchez, 2015) found a 47% survival rate on transplanted beaver with nearly 60% of all mortality caused by predation. We understand transplanted beaver would naturally have a higher mortality rate than the normal population, but the fact that the largest cause of mortality is predation indicates that predation is indeed is major factor in all beaver populations, most likely a larger factor than trapping.

I live in Wallowa County. We have had beaver closures on six streams in the county, the Minam River has been closed in its entirety for 56 years, Bear Creek, the Lostine River and Hurricane
Creek have been closed above the national forest boundary for 50 years, the Wallowa River has been closed above Wallowa Lake for 50 years and Peavine Creek has been closed for 34 years. I cannot speak for the Minam River as it is not an accessible river, but know that Bear Creek, Hurricane Creek and Peavine Creek are devoid of beaver within their entire length. The Lostine river might have at the most two beaver dens within the closed area. All these years of closure for no increase of beaver. Local ODFW biologists would support lifting all these closures.

The Siuslaw National Forest has over stepped its bounds by bringing this to the commission. The ODFW has the sole authority to manage all wildlife in the state, unless a species is federally listed as threatened or endangered. We feel any federal agency with concerns over wildlife issues needs to work with the state agency to alleviate those concerns, and not attempt to circumvent the state agency to enact regulations.

Before you blame diminished Coho Salmon runs on trapping, there needs to be some long term specific scientific research that takes all these factors into consideration. Do not shoot from the hip and allow beaver closures until we review all the factors in play and define correctly the reasons for Coho Salmon declines.

Thank you for your consideration.

Respectfully

Jim Soares
708 N Bear Cr Rd
Wallowa OR 97885
Please do not take away the right of Oregonians to trap beaver. Trapping is an important trade that we cannot afford to lose. Additionally, un-biased data is clear that beavers are NOT endangered.

Thank you.

Gwen Peters
Good afternoon Commissioners,

I hope you are well! Attached, please find a letter from Greater Hells Canyon Council urging your thoughtful consideration of the proposal to amend OAR-635-050-0070 to remove trapping as an impediment to beaver recruitment on federally managed public lands in Oregon.

Please feel free to reach out to me with any thoughts or questions related to this letter, or its relevance to our lands and communities here in Northeastern Oregon.

Much obliged for your thoughtful attention,

Christina deVillier
Wild Connections Coordinator
Greater Hells Canyon Council
April 10, 2020

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

Dear Commissioners:

My name is Christina deVillier. I’m the Connections Coordinator for Greater Hell’s Canyon Council (GHCC)—a rural Oregon nonprofit with a 50+ year legacy of conservation advocacy in our spectacular Northeast Oregon home. On behalf of GHCC, I write in support of the request that OAR 635-050-0070 be amended to close Oregon’s National Forests, Bureau of Land Management lands, National Monuments, Federal Wildlife Refuges, National Parks, and National Grasslands to commercial and recreational beaver trapping. Your decision to do this will demonstrate ODFW’s strong commitment to Oregon’s water abundance and ecological integrity, both now and into the climate-impacted future.

I work on ecological connectivity. Modeling and observation both show that many species in Oregon (and across the globe) are on the move, avoiding human pressures and tracking shifts in their suitable habitats as the climate changes. Low-gradient, fish-bearing riparian systems are the most important arteries on the landscape for animal movement—so improving the quality of riparian systems is one of the best things we can do to improve ecological connectivity across the landscape. While many riparian restoration efforts are underway in our region, it is broadly acknowledged that there is no more effective (or more affordable) partner in dynamic, system-wide riparian restoration than the American beaver.

With this in mind, I am working with collaborators on multiple projects related to beavers and their activities, including an effort to enlist citizen scientists to survey for beaver occurrence and suitable habitat in northeastern Oregon, in coordination with ODFW, the USFS, Grande Ronde Model Watershed, and Nez Perce Tribe Fisheries. All of us understand that Oregon’s state animal drives crucial ecosystem processes, and the public, too, is beginning to comprehend the beaver’s importance as a hydrological engineer: a mitigator of both droughts and floods, and therefore an essential partner in our state’s adaptation to climate change.

Beavers’ recovery from near-extirpation in the last century has been slow and uneven, especially here in Eastern Oregon. Beavers face many barriers to recolonizing our waterways—including both habitat challenges and trapping pressure.
ODFW has the authority, and a timely opportunity, to eliminate one of these barriers to this animal’s successful reestablishment in the landscape. Your strong leadership on behalf of this species will be particularly impactful in this moment when Oregon’s water future is a statewide priority, and when nature-based solutions to climate change are gathering support in our region and all over the planet. We ask for your careful consideration of this proposal to remove trapping as an impediment to increasing beaver numbers on these federally managed public lands.

GHCC, our members, and our collaborators look forward to continuing to work with your agency to better understand beaver distribution and population dynamics in our region; with the USFS and other partners to restore habitat; and with the public to strategize co-existence—all to improve conditions for this essential ecosystem engineer.

Thanks for your attention in this unprecedented time. I hope you and yours are well.

Christina deVillier

Connections Coordinator
Greater Hells Canyon Council
From: Jason Wilz <trapjasonwilz@gmail.com>
Sent: Wednesday, May 20, 2020 5:39 PM
To: Odfw.commission@state.or.us
Subject: Honestly I hope that your plans to shut down beaver trapping. You need to look at states who have tried this in the past with it turning into a financial disaster!!

Sent from my iPhone
Commissioners, I have learned of a petition to ban beaver trapping on National Forest Lands and other public lands in Oregon. As a US citizen owning an interest in all National properties I would like to voice my opposition to this petition. I have read the petitions and did not see any conclusive science or data that supports the petitioners claims. I would strongly urge you to consider science and data in making a decision regarding this ban request. There have been 16 of these closures running for the past 47 years and yet no data or study suggests what the petitioners are claiming. The petitioners included National Monuments, Federal Wildlife Refuges, National parks and other places in their petition. Little do they know that trapping is not allowed on these anyhow and It would appear with these additions that their ultimate goal is to ban beaver trapping completely. Massachusetts banned beaver trapping and within a few short years the population tripled and damage to infrastructure was extremely high.

Beaver trapping is a regulated activity in Oregon. ODFW uses scientific management already no bans are needed. This seems to be an animal rights agenda not an environmental issue. California basically banned effective methods of beaver trapping in 1998 and no scientific data has been presented that coho salmon miraculously or dramatically increased.

Please vote against this emotion driven ban against beaver trapping. Thanks, Dean
To all included,

Please find written testimony attached.
Thank you for your time and review.

Sincerely,
Joel Strimling
President Oregon Outdoor Council
Urging the ODFW Commission to Reject Baseless Petitions

Dear Fish & Wildlife Commissioners,

The beaver is the most iconic animal in Oregon. It is woven into one-half of our state flag. Our state history is built on its sustainable harvest from trapping. ODFW is slated to hear a proposal to ban trapping of beavers in several wilderness areas and another to ban all Beaver trapping on public lands within the state without any scientific research or backing. Trapping and hunting in this state are not just a part of history but a part of the present. Such pursuits provide sustenance, fur-bearing, and economy for those that trap. Sadly, there are fewer trappers than ever with the restrictions put forth and proposed by those that have no relationship to their food, clothes, or environment.

The greatest threat to Oregon’s state animal lies not in its trappers and furbearers but human population and urban epicenters. The hunter, trapper, and furbearer are well-educated how to conserve and manage this resource. Eliminating trapping in these sustainable areas without any scientific data erodes the present and future of the state. It binds the hands of ODFW to manage all animals and resources.

The total of beaver trappers in the state is less than 200. The proposals attempt to indicate that limiting or eliminating Beaver trapping will support salmon recovery; however, some areas currently banned from beaver trapping have not seen any benefit to salmon yields. To further increase bans statewide to areas that have no salmon, and historically have not, defies logic, science, and the North American Wildlife Management model.

It is not the beaver that needs rescue. Beavers and trappers are less than one percent of the problem and solution. ODFW already knows this. It is time to use a calm head and remind those that request such a review of the science and issues facing forests and fisheries. Hunters and trappers are the ones that have saved animals in the modern era, not extirpated them. Those that request such overreaching legislation, in reality, have no interest in the beaver, the salmon, nor the appropriate management of all. They seek to quash what they do not understand and “feel” is wrong. In short, this is a hope and a guess by those that care about fisheries. It is based on zero scientific evidence and research and serves to satisfy egos and provide publicity.

We urge you to reject these proposals summarily and give their proponents no basis to feel empowered. Both proposals would strip ODFW of its ability to manage, and further erode the rights of its trappers, hunters, and anglers.

Sincerely,
Joel Strimling, President
As an Oregon outdoorsman I ask that you don’t put a ban on beaver trapping on public land. They are a renewable resource that are actually over populated in many area according to several ODFW biologists

Sent from my iPhone
May 20, 2020

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

Dear Commissioners:

Attached is a letter in support of a request to amend OAR 635-050-0070 as it pertains to where beavers (Castor canadensis) may be trapped within the state. This request directly addresses goals and objectives of the 2016 Oregon Conservation Strategy, which were developed with input from Oregon Department of Fish and Wildlife.

I would appreciate notification that the attached letter has been received by the commission.

Sincerely,

Robert L. Beschta, PhD
Plus 38 cosigners
May 20, 2020

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

Dear Commissioners:

We, the undersigned, are writing in support of the following request that is before the Commission to amend OAR 635-050-0070 as it pertains to where beavers (*Castor canadensis*) may be trapped within the state:

**Permanently close to commercial and recreational beaver trapping and hunting all National Forests, Bureau of Land Management lands, National Monuments, Federal Wildlife Refuges, National Parks, and National Grasslands in the state of Oregon.**

This request directly addresses goals and objectives of the 2016 Oregon Conservation Strategy, which were developed with input from Oregon Department of Fish and Wildlife.

We support this request based on several considerations. Oregon is called the Beaver State, for a reason. Prior to European arrival in North America, Oregon’s streams and rivers may have harbored an estimated one million North American beaver (Guthrie and Sedell 1988). However, six decades of widespread beaver trapping, from the 1780s through the 1840s, had devastating effects on their population. “Beaver pelts became dominant in the Pacific Northwest fur trade around 1820” with production from trapping peaking in 1833 (ODFW 2005). As a result, beaver populations were “considerably reduced” between Fort Vancouver and northern California and “nearly extinct” in the lower portion of the Columbia (Rainbolt 1999). In eastern Oregon, beaver populations were similarly decimated as the Hudson’s Bay Fur Company attempted to create a “fur desert,” a strategy aimed at clearing beaver from broad areas south and east of the Columbia River to keep encroaching Euro-American trappers from coming west of the Continental Divide (Ott 2003). With the widespread loss of Oregon’s beavers, there was a concurrent loss in beaver-associated riparian habitat and wetlands across the state. These effects were later exacerbated by the introduction of large herds of livestock on public lands, splash dams related to large-scale logging, and the conversion to farmland and urban areas along major valley bottoms.

National forests comprise nearly one-fourth of the state, yet in 1929 less than 4,000 beaver were estimated to reside on these lands (Bailey 1936). This population estimate represented less than one-half of one percent of the total number of beavers that may have been present in Oregon before the widespread trapping in the late 1700s and early 1800s, indicating little if any recovery nearly a century later. Given this lack of recovery on National Forest lands and other public lands, it is likely that Oregonians have generally been unaware of the impacts that widespread beaver loss has had on riparian areas and aquatic ecosystems for many of the state’s streams, rivers, and wetlands and therefore, on its fish and wildlife. However, those impacts have been far reaching and both ecologically and economically devastating.

Beaver activity affects stream systems of all sizes and in a variety of ways. In many streams it is the assembly of a simple but robust instream feature, the beaver dam, that sets extraordinary changes in motion. These dams slow and store a portion of streamflow or surface water that is moving down the valley, thereby creating a pond that helps protect their lodges while increasing
their aquatic and vegetative habitats. Dams will vary in lengths, heights, and widths depending upon topography and other site conditions, and their configuration may change over time. Some continue to increase in size as beavers add additional wood or sediment, whereas others periodically wash-out during high flows, only to be subsequently rebuilt or replaced with a dam in another location. Some dams only cause water to be backed-up within the banks of a channel whereas others spread water across floodplains. In nearly all instances water tables in the vicinity of a beaver dam will be elevated leading to changes in the riparian vegetative community.

In other streams, dams are not built due to river size or the existence of abundant water. In these cases, beavers will build their lodges in the banks and create a different set of benefits for fish. For example, Parish (2016) found that juvenile coho and other salmonid species used beaver bank lodges for summer rearing habitat. Coho salmon and other salmonids were also commonly observed utilizing other burrows and woody debris piles created by beavers, and summer rearing was strongly correlated with the volume of cover created by beavers.

Riparian areas are defined by the National Research Council (NRC 2002) as “areas that are transitional between terrestrial and aquatic ecosystems and are distinguished by gradients in biophysical conditions, ecological processes, and biota.” In the western United States, it is in these areas that beaver dams are so effective at working their ecosystem magic for the benefit of plant communities, terrestrial wildlife, birds, amphibians, fish and other aquatic organisms. Where beaver dams occur, ponded water increases the availability of surface and subsurface moisture seasonally, over time, and along stream systems. These changes in turn allow for a wide range of plant types to grow in a given area, ranging from wetland to upland species, thereby creating compositionally diverse and structurally complex plant communities. This increase in diversity and complexity in riparian areas is particularly noticeable in arid land ecosystems, such as east of the Cascades in Oregon where water is normally in short supply. Thus, beaver are not simply “engineers” proficient at building dams, but instead are recognized as “ecosystem engineers” because of their capability, via their dams, to create riparian and aquatic systems that are biologically diverse and highly productive, as summarized by Wright (2009) and Johnston (2017).

It has taken time for the scientific community to understand the significance of beavers at the landscape scale due to the separation in time between when trapping, Euro-American settlement, and scientific studies of streams began. In the years between trapping and settlement, streams and riparian systems underwent their first transformation as dams failed and were not repaired. They experienced a second transformation when land uses following settlement triggered widespread erosion and changes in vegetation. Then, decades to over a hundred years passed before the field of scientific inquiry of stream systems began. By that time, evidence of beavers as a defining influence on the landscape had faded. In the East, logging and agriculture had triggered erosion that buried the beaver-created wetlands beneath feet of sediment by the late 1700s to early 1800s. In the Southwest and Intermountain West, only spotty and rapidly changing evidence of beaver remained in the 1850s when the General Land Office surveys and expeditions arrived, and thus was considered of local rather than regional significance. Though they missed the regional significance at the time, their notes would later prove key to helping unravel the story of change (Fouty 2018).

Bailey's (1936) publication about mammals in Oregon identified some of the attributes beaver provide for riparian areas and aquatic ecosystems. His publication has been followed by field research related to beavers since at least the 1940s. Masters and PhD research in Oregon
includes the following studies: food selection and utilization by beaver (Roehmoldt 1940); fish occurrence in beaver ponds and other channel habitats (Duke 1982); beaver effects on stream, streamside habitat, and coho salmon fry populations (Bruner 1989); small mammal and amphibian communities in beaver-pond habitats (Suzuki 1992); beaver effects on channel morphology (Dent 1993); groundwater levels and stream temperatures adjacent to a beaver pond (Lowry 1993); sediment capture and retention in beaver ponds (Ringer 1994); groundwater tables adjacent to beaver ponds (Sharps 1996); distribution of beaver ponds and effects on plant communities (Perkins 2000); effects of beaver ponds and water temperature on Lahontan cutthroat trout (Talabere 2002); and beaver relocation for enhancing salmon habitat (Petro 2013).

In the second half of the 20th century, and particularly in the first two decades of the 21st century, there has been a major increase in “Castor canadensis” publications, with fully two-thirds of them occurring in the last 20 years (Figure 1). In addition to the sheer number of beaver-related studies, this literature covers a range of topics whose relative importance can be indexed by the occurrence of keywords in publications that also contain “Castor canadensis.” Doing such a search of publications with “Castor canadensis” found they also included the following keywords: ecology (72% of the publications), fish (62%), habitat (60%), diversity (54%), and ecosystems (42%) (Figure 2). Thus, only in recent decades has the scientific community come to more fully understand the crucial effects beavers had as ecosystem engineers and keystone species, effects which may be recovered, at least in part, for many of the state’s riparian areas and aquatic ecosystems with a change in the trapping regulations.

!["Castor canadensis" publications](image)

**Figure 1.** The number of publications containing “Castor canadensis” by 10-yr periods from 1900-2019 (n = 13,600). (Source: April 13, 2020 Google Scholar© search).
"Castor canadensis" publications with indicated keyword

Figure 2. The percent of “Castor canadensis” publications that also contain the indicated keyword (n = 13,600). (Source: April 13 2020 Google Scholar© search).

From this increasing amount of “Castor canadensis” research and publications in recent decades, the scientific literature has confirmed that beaver dams, ponds, stream bank lodges, foraging, dispersal and other activities of this mammal can have a vast array of ecosystem benefits, such as:

Creating ponds and wetlands -- Beaver dams impound water, creating ponds of various sizes and dimensions. In low gradient environments, these ponds help create wetlands or expand existing ones. These effects were aptly demonstrated in Acadia National Park where beaver recolonization resulted in nearly a 90% increase in ponded wetlands (Cunningham et al. 2006).

Spreading water, storing groundwater, causing hyporheic flows -- Beaver dams often spread water onto adjacent floodplains, particularly during periods of high flow, enhancing the availability and storage of soil moisture on those landforms. Raised water tables adjacent to beaver ponds may also contribute to hyporheic flows (subsurface flow around and under a dam) and help to maintain base flows. In Yellowstone National Park, beaver dams were found to reduce late-summer water table declines by as much as 40 cm (16 inches) (Bilyeu et al. 2008).

Trapping sediment -- The slow-water environments associated with beaver ponds make them extremely effective at trapping sediments of all sizes, thus helping to maintain high water quality (Ringer 1994, Fouty 2003, Rosell et al. 2005, Demmer and Beschta 2008).

Growing a diversity of plants, storing carbon -- Riparian areas adjacent to beaver ponds contain a diversity of plant species because of the soil moisture gradients that commonly occur. These plant communities effectively remove and sequester carbon, both above-ground (stems of
woody plants) and below-ground (root systems and the organic carbon in soils). The potential importance of carbon sequestration was illustrated by results from a study in Rocky Mountain National Park where valley-bottom carbon storage declined by two-thirds following the removal of beaver, from 23% of the total landscape carbon storage to only 8% as wetlands were lost and meadows dried up (Wohl 2013).

**Sustaining salmon and other aquatic species** -- Broad, deep pools provide critical habitat for anadromous fish, such as young coho salmon in Oregon’s coastal streams (Bruner 1989, ODFW 2005, Romer et al. 2008, Strickland et al. 2018), as well as resident fish species, such as Lahontan cutthroat trout and bull trout in the relatively arid portions of the state (Talabere 2002). An extensive loss of beaver ponds along Washington’s Stillaguamish River was found to be the primary factor contributing to an 86% reduction in overall smolt production potential for coho salmon (Pollock et al. 2004). In Oregon’s John Day River, an increase in beaver dam density in one tributary lead to a 175% increase in juvenile steelhead production (Bouwes et al. 2016). Along with fish, amphibians, and aquatic invertebrates also benefit from the habitat created in beaver-influenced stream reaches.

**Providing habitat for terrestrial wildlife** -- Moisture gradients and abundant water are major factors in the diverse structure and composition of plants found in beaver-created ecosystems. Various deciduous tree species (e.g., aspen, willow, cottonwood) grow well in these moist environments. In turn, these species along with their understories of shrubs, forbs, and graminoids provide important physical habitat and food resources for a wide range of wildlife species, including pollinators, small mammals, bears, ungulates, and others. In Oregon and Washington, 95 of 147 mammal species (65%) utilize riparian areas (Kauffman et al. 2001).

**Benefiting birds** -- Some of the most important beneficiaries of having beavers present are birds. Ducks and migratory birds utilize beaver ponds and wetlands while songbirds commonly use willows, irrigated by elevated water tables, for nesting and perch sites as well as adjacent habitats with their variety of food resources. In northern Colorado 82% of breeding birds use riparian areas and in the southwestern US more than 75% of all bird species nest in riparian areas (Knopf 1985). Wyoming streams with beaver had 75 times more waterfowl than streams without beaver (McKinstry et al. 2007).

**Moderating the effects of climate change** -- Less snowfall, earlier springtime melt, lower summer flows, and increasing annual temperatures are becoming a prevalent signature of climate change in the American West (Abatzoglou et al. 2011, 2014). Such changes bring with them rising concerns about increased droughts and wildfires and their economic impacts on agricultural communities and ecological impacts to fish and wildlife. Beaver dams, ponds and associated wetlands can locally help maintain moisture-loving plant communities, as well as the terrestrial wildlife and avian species dependent upon them. Such areas also provide refugia during wildfires (Fairfax 2019). Thus, beaver provide a vital ecosystem buffer to many of the adverse effects of a changing climate.

The science today is abundantly clear, beavers have a fundamental role in sustaining productive riparian/aquatic and wetland ecosystems. Beavers can provide major benefits for supporting diverse plant communities, a large number of terrestrial and avian wildlife species, and fisheries and other instream organisms, while also helping to mitigate the effects of climate change and wildfires. Because of these critical ecosystem benefits, we urge the Commission to favorably consider the proposal to amend OAR 635-050-0070.
Sincerely,

Robert L. Beschta, PhD
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*Affiliations provided for informational purposes and indicate the credentials of the cosigners.*
Literature cited in Letter


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Roehmholdt MH. 1940. A food utilization study of Pacific coast beaver (Castor canadensis pacificus – Rhoads). School of Forestry, Oregon State University, Corvallis, OR.


To whom it may concern

I'd like to voice my opinion about the group trying to stop trapping on public lands. I believe that we have a given right to trap and hunt critters in a legal method. Our ancestors have done it for centuries. We shouldn't allow a group to do this to our rights. We will run into problems on streams and rivers with over populated rivers, streams, lakes and ponds. Only good thing is they are not mountain lions or wolves.

Thank you for your time.

Chris Voorhees
Please please I beg of you to shoot down these petitions to shut down beaver trapping on federal and state lands, I know you folks are very intelligent and professional, so I just hope that the lack of scientific reasoning behind they’re petitions is proof enough they just want my side of the isle to suffer who love these animals and the meat and fur they provide! Thank you for your time. God bless!

Sent from my iPhone
I just read a letter put out by the Oregon Trapper's Association about a hearing that is going before the commission about ending beaver trapping on the Siuslaw National Forest. I read this nonsense and wonder what biological data was, or will be presented that shows trapping has caused dramatic reductions in the beaver population in the Siuslaw National Forest. I have sport trapped for over ten years, and am an avid outdoors person who travels to many different places all over this great state with family and friends. This last weekend I traveled from Redmond to Post, through Paulina, through Izee, Johnday, to the Painted Hills, and back to Redmond. During that day I saw so much beaver sign from the passenger seat of a vehicle that in no way did it ever cross my mind that our beaver population was decreasing or in trouble. Whenever I saw good beaver habitat, I saw beaver sign. And conversely, if it was bad beaver habitat, I saw no beaver sign. If there is some trustworthy biological data that showed that this was true, then by all means let's take a look at how we can increase the beaver population. I would really really hate to see a closure without hard, proven, factual information. I feel this might start a precedence for other lands in our state. Do not close beaver trapping in the Siuslaw National Forest. Respectfully, James Halsey
As a United States Citizen of 67 plus years, I strongly Oppose the suggested closing of the US Forest, BLM and or other public Lands in Oregon, to trapping beaver OR other Fur Bearing Animals Trappers have stricked enough laws enforced by our Federal and State Wildlife Agencies without closing our Public Lands!

Sincerely, Robert M. Jones
As an Oregonian, I strongly oppose banning beaver trapping in Oregon. This species needs to be effectively managed to sustain a healthy population and a balanced ecosystem. Part of sustaining that healthy population is keeping their numbers at a steady population, as trappers have done for years and years in Oregon and many other states and territories.

We must use a science based approach to this and science shows that there is no correlation between coho salmon and beaver populations. This is a smoke and mirrors trick employed by the extremist animal rights groups.

Approximated 60% of the state upstream of Lake Billy Chinook, all land upstream of Hells Canyon Dam and everything in the central and eastern high desert drains out of the state or into the Klamath basin, into areas that have NEVER had coho salmon. This is science not speculation.

I would like to see beaver trapping continue in Oregon and other areas of the continent. Beaver numbers are doing just fine and in most cases are actually fluctuating and need to be continually managed for a HEALTHY beaver population, which results in a healthy overall ecosystem.

Sincerely,
Eric Wieland

So I guess the roughly 2/3rds of the state that is upstream of Billy Chinook on the Deschutes; and everything that is upstream of Hells Canyon Dam; and everything in the high desert that either doesn't drain out of state or goes to Nevada; or the entire Klamath basin; or any area in a Cascade or Coastal drainage that is upstream of a dam with no fish passage should all have beaver trapping banned to protect Coho? Those areas either never had Coho or they are now cut off from anadromous access. So Coho couldn't get there to spawn if they wanted to, but I guess we better protect the beaver to protect the Coho that aren't/never were/cannot access in most of the state?

Not to mention there are plenty of National Forest areas that don't allow beaver trapping in the current regulations. Surprisingly, those areas aren't teaming with Coho.
Concerned about public lands being closed to a handful of people that care about the land and the beavers that live in it. We are Americans citizens and this is public land that the citizens of the United States own and we should be able to use the the land and it’s renewable resources that Mother Nature has put on earth.

Bernie Nelson
Sent from my iPhone
Hello,

Though I live out of state, Oregon should not ban trapping or otherwise ban the harvesting of beaver. Beaver populations are sustainable, beaver are instrumental in adding revenue to the Oregon economy (albeit not as much as they were due to fluctuations in the fur market), and though beaver are hugely valuable to watersheds they renew themselves under properly regulated harvestin.

Please don't cave in to the anti-consumer/anti-trap faction and their emotional rants. Please follow the science of wildlife management and allow the advice of furbearer biologists and allow the rational harvest of beavers.

Respectfully,

Jeff Rader
Livingston, Montana
Attached is a letter to the board of Oregon Dept. of Fish & Wildlife concerning the petition to close the Siuslaw National Forest or any other forest land to the trapping of beavers.
Gary Holtz
503-348-8095
Gary Holtz

141472 Red Cone Drive

Crescent Lake, Oregon 97733

To: ODFW Board

Subject: Closure of beaver trapping in Siuslaw National Forest

Board Members,

My first questions would be to the anti-trapping petitioners: What personal observations do they have that beaver trapping is detrimental to the beavers in the Siuslaw National Forest? Have any of the petitioners witnessed/observed any beaver activity in the Siuslaw National Forest, or any other area in the state of Oregon where trapping has eradicated beavers from the area? Have any of the petitioners observed/witnessed the damage that beavers can cause if allowed to repopulate and relocate without any control?

I have personal observation of uncontrolled beaver activity that has been detrimental to the landscape and farming activity.

I lived in North Bend, Oregon many years ago. I had a friend who lived up Shutters Creek, on the East side of Ten Mile Lake. Beavers moved in and dammed the little creeks and plugged the drainage culverts. Almost over night the farmlands were flooded, cows, horses, sheep had no pasture to graze on. Farmers broke the dams and unplugged the culverts but it was a losing effort. Beavers would continually rebuild and replug the culverts. A trapper was finally called in and the beavers were trapped and removed. The pasture land was reclaimed after the water receded.

I now live near Crescent Lake, Oregon. A number of years ago beavers moved into the area just South of the Crescent Lake Junction on the East side of Highway 58. They dammed up the little creek that flowed through a culvert under Highway 58. Their dam was far enough away from the highway and in tall underbrush so that it was not seen by motorists. After a couple of years the beavers had a number of acres of woodland flooded and growing in size. The water level had finally risen so that the “beaver ponds” could be seen from the highway. The land owner finally became aware of the beaver invasion and called in a trapper to remove the beavers. The beavers were trapped but it was too late environmentally. The land had been flooded for too long and all the trees died. Now the area is an eye sore because of all the dead trees and also a fire hazard.

So! If trapping is banned in the Siuslaw National Forest, how do the anti-trapping petitioners plan to control the beaver population?? Or will they allow the beavers to repopulate and relocate so that they build dams and flood our national forests and kill the “tree hugger” trees? What solution do they have that will control the beavers? Beavers have only one thing on their minds-build dams, flood acreage for making their “ponds” so they can repopulate and make more dams and flood more acreage!! How is this beneficial to our national forests? I don’t think hikers want to wade through water on the hiking trails that may have Giardia in the water!
I understand that there are at least 15 closed national forests or area closures within the state of Oregon, totaling 731 years of closures. 500 of those years in national forests. The closures go back to 1955 up to 1986.

I believe that most of these “anti-trapping” petitioners are people who live in big cities or suburban areas and have no idea what goes on out in the national forests “wilderness”! Have they observed what happens when wildlife repopulates to the point where they have no more food to eat? How diseases move in and then kill off the animals and they rot away or are scavenged by other animals who then may ingest the diseases and they die! Or as documentaries seen on TV’s National Geographic channel shows wolves turning on members of their own pack and killing them for food-survival of the fittest!

Trappers are conservationists and they see what is going on with “Mother Nature” because they spend a lot of time out in the national forests “wilderness”. They remove or at least try to remove the over abundance of fur bearing animals to keep the remaining populations healthy. They work with ODFW in managing fur bearing animal populations. By allowing the anti-trapping petitioners to close the Siuslaw National Forest or any other forest land will be detrimental to the environment. The closures will have escalating negative effects on animal life and the landscape! Can the anti-trapping petitioners prove otherwise?

Sincerely

Gary Holtz
Your trapper help save your roads being washed out or you can ban trapping have higher taxes fix your roads.
Please do not introduce any new regulations on our public land trapping. Our freedoms are at stake bad enough now. Thank you very much.

Lonnie Carver
38134 Conser Rd NE
Albany, OR. 97321

Sent from my iPhone
Beavers need to be trapped. They are a renewable resource. They cost landowners millions in dollars of damage. Uncontrolled will result in more damage.

Sent from my iPhone
From: Stephen Henning <tyg.henning@gmail.com>
Sent: Wednesday, May 20, 2020 12:26 PM
To: Odfw.commission@state.or.us
Subject: Beaver trapping: I am totally against stopping beaver trapping, if you do that you will have created another problem, before long there will be sooo many that they will destroy hundreds of thousand Sofia acres sands of

Sent from my iPhone
As Beaver have very few natural predators to help stabilize their populations, and one pair of beaver can produce up to 9 kits per year, the economic destruction to agricultural farm land and forest can be devastating. Trapping is an essential tool to help maintain a overall healthy beaver population and reduce loss of important natural resources and farm land. Please vote to keep Beaver trapping.
Sincerely,
Randy Parker
I'm very concerned about the upcoming beaver trapping band. I do not trap beavers myself. And was wondering what the reasoning for banning beaver trapping in the state of Oregon is? Is it just a public image thing or just another example of taking peoples hunting rights away?
Sent from my iPhone
Please stop all beaver trapping in Oregon on all National Forests and other public lands.

Best wishes,

Sarah Ryan-Knox (she/her)
Paralegal
Endangered Species Program
CENTER for BIOLOGICAL DIVERSITY
P.O. Box 11374 | Portland, OR 97211
T | 971-717-6416
Dear commission,
I would like to take this opportunity to express my opposition to outlawing beaver trapping on public lands. There is no scientific evidence that this extreme measure is warranted in any way. Trapping (especially beaver) has been part of Oregon's heritage for 200 years. This is just another blatant attack on our lifestyle and industry. Please vote no. Beaver are in no danger of over harvest and are a troublesome pest in our area.
Thank you,
Randell Whiting
39760 Modoc point rd
Chiloquin, Or
5412813057

Sent from my U.S.Cellular© Smartphone
Hello there,

I’m writing this email to voice my concerns about eliminating beaver trapping in the state of Oregon. Multiple states have documented studies proving that cold-water fish species don’t typically benefit from the presence of beavers. Due to the slowing of water flow and removal of willows along water bodies, water temperatures increase, as do the amount of silt in the water. Beaver colonies allowed to remain unchecked often amount to damage to roadways and water systems, the financial burden of which most oftentimes lands on the shoulders of the taxpayer. Beavers are very interesting animals, and have a very important place in a wild landscape. Protecting them outright vs managing them will have multiple unintended consequences, and no one will benefit in the long run. I urge you to use science to sway your decision.

Thank you,

Chris Morgan
Dear Sirs/Ma’am...

Please reflect & consider my opinion on this matter. Beavers are Not & have never been an endangered animal!! Because of over population of people in “Many” rural areas WE ALL have to co-exist in this country.

No better Stewarts of the land, than Hunters, Fisherman, Trapper’s, Biologists, to keep things in check!!!
Because of population growths, and these are documented facts... without balancing wildlife, The pendulum will swing the wrong way & IT IS Our duty to the land & wildlife system to keep things in check.

Thank You For Your time & listening...
Sincerely,

Joepaul Meyers,CJF, MS
Ironhorse Predator Control
State Trapper/ District#7
Gatesville, Tx. 76528

Sent from my iPhone
This was instituted in Massachusetts. Now all land owners must pay Licensed State trappers thousands of dollars to state authorized trappers but only after numerous community and board of health scheduled meetings meeting to eradicate populations endangering water supplies but tree growth and harvesting are flooded with out recourse.

The food and fur which is realized from this resilient animal is utilized by many families to augment meager incomes.

It would be a mistake to prevent trappers from pursuing this very prolific species of fur bearer. The methods of trapping today are humane and controlled by state biologists and as well as numerous laws and law enforcement officers checks involving the welfare of the resource.

Please do not endanger this population control method.

Thank You,

Respectfully,

David JT Ramsey
Kidd145@aol.com
Stopping beaver trapping will not only allow thousands of acres of timberlands production removed due to wetlands acts. It will also lead to people carrying guns at night to kill them which will lead to other wildlife killed by none law abiding people

Mike Dees
Timberlands owner
And trapper
Citronelle Alabama
Good Morning,

I strongly oppose any new regulations on trapping. Trapping is an essential part of controlling Beavers and other mammals that populate our water ways here on Oregon public land.

It is a great tool for control and a good resource for state income.

Please do not make any changes to the existing regulations.

Thank You!!

Mike Cochran

CAMCO, INC.

Mike Cochran  
Plant Manager  
www.camcocedar.com

📞 541.391.5314 . Rainier Custom Remanufacturing Inc  
✉️ 541.367.5666 . Fax
To Whom This May Concern:
It has been brought to my attention that the State of Oregon is considering the suspension of Trapping Beaver in the your state of Oregon, in order to benefit the Coho Salmon. Data from the results of similar management tactics in other states reveal this is ineffective.
As a Federal Taxpayer who has a vested interest in all of the Federally Funded parks, Wildlife Preserves, National Parks, and any other park, preserve, or wildlife region receiving U.S. Federal Funds, I do urge Oregon to reconsider this action.

As a wildlife enthusiast and a trapper, I do feel that the current wildlife and trapping regulations that are in your state are in place at a correct and sustainable management level. Your actions to eliminate beaver trapping, will effect other states. As an agricultural producer, I have the need to trap beaver from my drainage ditches on our farm land. I know that when one state begins this trapping elimination, others will be encouraged to do the same.
Please reconsider your upcoming decision, so it will not affect our entire nation.
Thank you for your consideration in this matter.
Mike Moody,
Hamburg, IA
Good morning. I’m Jeremy Watson. I’m a very avid hunter, fisherman and more so a trapper in this beautiful state. I’m writing you today about the two beaver tapping ban’s that are before you… first off I appreciate your time to read this. Before 1859 beaver trapping has taken place here and it still does today. I know for a fact that we have the best biologist for the job and his voice should be heard. This is nothing more than a jab from these animals rights groups. Please consider the true facts… thank you in advance.

Sent from Yahoo Mail for iPhone
The purpose of this email is to urge you to deny the request for this trapping closure.

I live in Lake County. In a similar situation the Fremont National Forest had a beaver trapping closure from approximately 1973 through 2005. Based on incidental observations I believe beaver populations on the Forest didn’t start to increase until the trapping closure was lifted. I suspect the increase had nothing to do with trapping, rather changes in riparian grazing regulations started going into effect in the late 1990’s and the beaver are responding to an improvement in habitat.

There is no credible evidence of regulated trapping having caused serious population declines in beaver or any other wildlife species. I suspect this is due to compensatory mortality which regulated trapping and hunting implements using the North American model of wildlife management.

It is doubtful that the proponents of this request understand the concepts of compensatory mortality or the fact that numerous studies have shown that beaver do not exist in areas without habitat. However, they are extremely good at colonizing new areas when habitat becomes available.

I urge the Commission to deny this request and thank you for your continued effort to base wildlife management decisions on the best available science.

Sincerely,
Craig Foster

Sent from Mail for Windows 10