Exhibit E
FURBEARER TRAPPING and HUNTING REGULATIONS FOR 2020-2021 and 2021-2022

SUPPLEMENTAL PUBLIC CORRESPONDENCE
As Of June 11, 2020
Dear Commissioners:
Attached, please find my comments regarding the proposed amendment to OAR 635-050-0070. I will be providing a brief testimony on June 12, but wish to submit my full comments for your consideration and the record.
I would very much appreciate a brief reply so that I know you received my comments.
Thank you very much,
Dan Rosenberg

*******************************************************************************

Daniel K. Rosenberg
Oregon Wildlife Institute
AND
Department of Fisheries and Wildlife
Oregon State University
Phone: (541) 757-9041
E-mail: dan@oregonwildlife.org
OWI Web: http://oregonwildlife.org
OSU Web: http://oregonstate.edu/~rosenbed/
*******************************************************************************
Dear Commissioners:

I am a wildlife ecologist and Co-Director of the Oregon Wildlife Institute, a non-profit organization that has worked closely with several biologists from the Oregon Department of Fish and Wildlife as well as a recipient of several ODFW contracts and/or grants.

**Restricting Harvest of Beavers on Federally managed Public Lands Supports On-Going Restoration Efforts in Oregon**

I am testifying on behalf of the proposed amendment to OAR 635-050-0070 to close most of the federally managed public lands in Oregon to commercial and recreational beaver trapping and hunting. The conservation benefits of restricting harvest of beaver to facilitate restoration efforts and maintain watershed health is obvious. The proposed regulation attempts to restrict harvest of beaver solely on these federally managed public lands in Oregon, where so much large-scale wetland and riparian restoration is taking place. The proposed amendment does not affect the ability of managers to remove beavers causing damage nor does it restrict harvests on private or state lands.

The scientific literature is clear on the importance of beavers in wetland and riparian restoration, and their beneficial role to many of Oregon's Conservation Strategy species. Given the millions of dollars spent on wetland and riparian restoration in Oregon each year, including millions of dollars from Oregon Department of Fish and Wildlife's sister agency Oregon Watershed Enhancement Board, it is simply ludicrous that these enormous efforts can be hampered – or made fruitless- by allowing beavers to be harvested for recreation and commercial purposes. Indeed, many riparian restoration efforts are focused on restoring beaver populations on these federally managed lands. To allow beavers to be harvested jeopardizes these time-consuming, expensive, and important projects that are goals of ODFW's Conservation Strategy and the Oregon Plan for Salmon and Watersheds.

ODFW notes in their response to the proposed amendment that most harvests are in response to damage on private lands, that ODFW actively discourages trapping beaver in critical coho habitat, that ODFW and has attempted to honor requests by specific National Forests to close recreational and commercial trapping.. Therefore, the proposed amendment should have negligible impact to current trapping practices yet reduce ODFW staff time in their efforts to discourage trappers from sensitive areas and from addressing closure requests on federally managed public lands while making it clear to all that these areas are closed to beaver harvests. Oregon Wildlife Institute’s own experience on a restoration project at Jack Creek in central Oregon made it clear that it is often difficult to notify trappers that a specific area is closed.

**Oregon Department of Fish and Wildlife's Response is Fundamentally Flawed**

As a population ecologist, I was also struck by the arguments provided by ODFW against the proposed amendment.
First, most of the argument ODFW makes revolves around a sustainable beaver population. However, the motivation for the proposed amendment is not concern over a declining beaver population – that happened years ago and beaver continue to be on the rebound. The rationale for the amendment is that beaver harvest on these federally managed public lands hampers restoration and healthy watersheds.

Furthermore, ODFW makes two profound but incorrect statements: 1) That all beaver habitat is occupied, and 2) that catch-per-unit-effort harvest data supports their arguments that there is no impact of harvesting beavers. ODFW makes the bold statement that "...beaver continue to be found everywhere there is beaver habitat" (Exhibit E, Attachment 3: p. 8). This is only true if you take the circular argument that defines beaver habitat as wetland habitats in which beavers occur. The effort on watershed restoration, including attracting or reintroducing beavers, shows ODFW's argument to be false.

ODFW's second argument about the impact of harvesting also misses the mark. A static regional or statewide population count is not even relevant to the issue at hand: attracting or maintaining beavers in desired watersheds for the conservation value to other species. Furthermore, catch-per-unit-effort is known to be a highly unreliable estimation technique – practically every wildlife management textbook points that out. The unreliability results from the false assumption that there is a known relationship between effort and population size. In the case of beaver harvests, this means that each trapper and each trap or harvest method has an equal chance to result in a harvested beaver—and because the comparison ODFW makes is across many years-that these relationships are stable year to year despite changes in who is trapping, where they are trapping, and beaver population size, among so many other factors. Anybody that hunts knows that such assumptions are not tenable.

I can understand ODFW's response to the proposed amendment only in light of serving the status quo. ODFW's arguments against the proposed amendment are inconsistent with scientific understanding of the impact of beaver harvest in watershed health.

Given the Importance of Watershed Restoration and Resilience, Commercial and Recreational Beaver Harvest Must be Closed on these Federally-managed Public Lands.

Sincerely,

Daniel Rosenberg, Ph.D.
Oregon Wildlife Institute
Corvallis, OR 97339
DATE: MAY 25, 2020

FROM: Oregon Chapter of the Wildlife Society

SUBJECT: Requests to Ban Beaver Trapping

TO: Oregon Fish & Wildlife Commission

Dear Commissioners:

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

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

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

The best available science does not support permanent trapping bans

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

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

**Sustainable wildlife resource management and responsibility**

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

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

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

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

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

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

Respectfully,
ORTWS Board of Directors

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

Literature Cited:


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


Appendix 1:

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

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

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

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

Annual harvest of beavers by trappers in Oregon during 1951-2010.
I’m writing in support of the petition to ban commercial and recreational trapping of beaver on public federal lands. Beaver are a critical part of a healthy ecosystem including creating wetlands, improving water quality, groundwater recharge and improving fish and wildlife habitat.

Protecting beaver is even more important in an age of climate change as beaver dams will be critical for retaining water that will be released by earlier melting snowpack.

Protecting beaver on public federal lands rather than making them available for commercial and recreational hunting is consistent with ODFW’s core mission to protect Oregon’s fish and wildlife and restore natural ecosystems.

Thanks for listening and taking desired action.

Jackie Brown
I am writing concerning the inhumane trapping of beavers on public federal lands. We need beavers to restore rivers for endangered salmon and steelhead by improving water quality and creating wetlands. Wetlands also store much of our carbon and we need to do what we can for fighting climate change. Protecting beaver on public federal lands rather than making them available for commercial and recreational hunting is consistent with ODFW’s core mission to protect Oregon’s fish and wildlife and restore natural ecosystems. I support the ban on commercial and recreational trapping of beaver on public lands. Laurie Kerr
Dear ODFW Commission,

PERSONAL NOTE: This is the 21st century. Is it not past time to be done with the cruel and rather useless killing of animals for their skins and fur? This is so 19th century, not to mention cruel and unnecessary. Have you ever watched an animal die in a trap of any type? There are few things more cruel and heartbreaking. Allowing trapping for a VERY few uncaring humans reflects very poorly on us as a species and a society. IT IS TIME TO DO AWAY WITH THIS CRUEL AND UNNECESSARY activity. Trapping of any type should be outlawed and those who continue to do so prosecuted. Again, this is the 21st century, not the 19th. Trapping is a relic from bygone days and does not belong in a modern society.

That said, please read on....

I urge you to support the proposal to ban commercial and recreational beaver trapping and hunting on all federally managed public lands in Oregon including National Forests, Bureau of Land Management lands, National Monuments, Federal Wildlife Refuges, National Parks, and National Grasslands.

As the “Beaver State”, it’s imperative we not only honor their cultural connection to Oregon, but also their ability as ecosystem engineers to improve water security, create and restore habitat like wetlands, refill groundwater, slow stormwater flow, and more. By allowing beavers to do their ‘busy work’, our state can help mitigate some of the worst effects of climate change like drought, flooding, and loss of fish and wildlife habitat -- all projected to get worse without bold solutions. Beavers should be a part of that solution.

That’s why I’m asking you to please support this proposal, amend the furbearer regulation, and end all commercial and recreational beaver trapping and hunting on Oregon’s federal public lands.

Thank you,

Sincerely,

Mr. Jim Van Osdell
10580 SW Riggs Rd Powell Butte,
malamute01@yahoo.com
Trapping beavers is wrong! They are living things! They add so much to our environment. They are part of the ecology of our rivers and streams. Let's protect them not kill them!

I am opposed to trapping any animals for their fur!. Please consider the cruelty of trapping animals for their fur -- or for any purpose. It is cruel and inhumane. It brings out the worst in humans. I believe that how humans treat other living things reflects our values toward life in general. I hope for a kinder and gentler world. Humans have used their intelligence to create wonderful non-animal fur that is as good if not better than animal fur.

Sincerely and with compassion,
Jeanie Golino
4618 NE 30th Ave
Portland OR 97211
Dear Oregon Department of Fish and Wildlife:

As a conservationist, I support the Petition to Ban the Commercial and Recreational Trapping of Beavers on Federal Land. It is well known that beavers are a critical part of a healthy ecosystem. They create wetlands, improve water quality, provide food for other wildlife and improve fish and wildlife habitat. They assist with controlling deer and are admired for their strong social structure.

Due to drought conditions caused by climate change in many parts of Oregon, protecting beaver has become even more relevant and critical. Beavers can help retain water that is released by earlier melting snowpack which will sustain other wildlife during the most severe droughts.

It is ODFW's responsibility and mission to protect Oregon's wildlife and this protection is even more dire today. Not only do we have a climate crisis and a pandemic, this planet is in hospice. These are "wake-up calls!"

Furthermore, it is important to note that due to the current pandemic, human involvement with the treatment of wildlife must be re-evaluated. Science has proven that the illegal wildlife trade and the irresponsible and inhumane treatment of wildlife has led to the spread of zoonotic viruses.

In conclusion, we must utilize this time by creating NEW guidelines as to how we can protect and preserve our wildlife, including beavers, while protecting humans as well. We must get rid of the "kill" mentality as that is what has led us to where we are today. Instead, let's start with preventing beavers from being hunted either commercially or recreationally on federal lands and educate about the benefits of preserving wildlife while preventing zoonotic diseases.

Respectfully submitted,

June Stephens
Hello,

I have attached our office’s letter of support for amending Oregon’s furbearer trapping regulation. Thank you for your consideration and please let me know if there is anything else we can do for you.

Regards,

Jack Lehman (he/his)
Communications Director
Representative Dan Rayfield
Capitol: 503.986.1416
June 5th, 2020

VIA EMAIL ONLY
ODFW Commission@state.or.us

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

RE: Oregon Furbearer Trapping and Hunting Regulations

Dear Chair Wahl,

I would like to personally encourage the Oregon Fish and Wildlife Commission to amend OAR 635-050-0070, regarding hunting and trapping of beavers on federal land. Amending this regulation will protect the natural wildlife as well as preserving the positive impacts that beavers have on their natural habitat.

I am not alone in sharing my support for amending the existing furbearer trapping and hunting regulations. Earlier this month, the Commission received a request letter from a civilian conservation group. The benefits of this amendment as both that group and our office understand them include:

- Fulfill ODFW’s mission statement to “protect and enhance Oregon's fish and wildlife and their habitats for use and enjoyment by present and future generations”;
- Implement actions that address the goals and objectives in the Oregon Conservation Strategy, the Governor’s 100-Year Water Vision and other efforts that seek to prepare Oregon for climate change and increased water-related concerns;
- Simplify the regulations and make them more uniform;
- Increase the density and distribution of beavers over time as beaver kits reach maturity and disperse, and nuisance beavers on private, state, county or city lands are relocated into suitable and vacant habitat on these federally-managed public lands. As the natural or human-assisted dispersal occurs, beavers will bring their dam-building, water and carbon storage, and habitat skills into other drainages.
- Retain the ability of state and federal officials and private landowners to manage beaver, since OAR 635-050-0070 applies only to commercial and recreational harvests, and our request applies only to the above mentioned federally-managed public lands.

It is my hope that the ODFW Commission will strongly consider making the suggested amendment to OAR 635-050-0070. This amendment would allow for such protection at little to no cost to the taxpayer
while also providing a keystone species extended habitat. It would not damage private landowner’s ability to trap furbearers, nor any landowner’s ability to transplant nuisance furbearers. Preventing the degradation of Oregon’s excellent natural resources is of the utmost importance, and preserving our beaver population is a step towards achieving that goal. We appreciate your consideration of this letter and are always available to talk further.

Very truly yours,

Dan Rayfield
We are writing to express our opinion that beavers should not be killed for either commercial or recreational reasons. Beavers create sustainable habitats for a multitude of wild species and maintain wetlands that provide refugia from wild fires. Beavers aid in keeping natural waters clean and riverbanks in good condition. Beavers need to be encouraged, not killed.

We really oppose trapping using either a restraining trap or a kill trap. A restraining trap will cause an animal to suffer for an extended period of time until the trap is finally checked (and the animal killed), or until the animal dies from its injuries, thirst or starvation. Even 1 hour in a trap may cause the animal trauma and/or injuries. It is just a horrible situation and such a trapping practice is reprehensible. If a kill trap doesn’t work properly the animals and the animal is injured but not killed it will again suffer a lingering and painful death. Moreover, traps often catch non-target species, including pets, and subjects them to injuries, pain, suffering and sometimes death. All this is done for the benefit of a tiny portion of Oregon’s human population.

In addition, hunting and trapping of wolverine, fisher, ringtail cat, sea otter and kit fox should also be prohibited. None of these animals are abundant in Oregon and all provide a crucial link to a functional ecosystem.
Voters in Oregon decided in 1994, when they adopted Measure 18, and again in 1996, when they declined to repeal Measure 18, that hunting cougars with dogs is inhumane. Chasing wildlife with dogs for training, recreation and entertainment is traumatizing to the animals, inhumane and can also injure or kill the dogs unnecessarily. Therefore we oppose allowing bobcat, raccoon, fox, and “unprotected mammals” to be hunted or pursued with dogs for recreation. The time for recreational hunting with dogs has passed and it is clearly unfair to all the animals involved.

Please consider this message, and our opinions as Oregon voters, in your deliberations.

Sincerely,
Juanita Ladyman and John Sanders
503-333-4387
11631 NW Old Cornelius Pass Rd
Portland, OR 97231
To ODFW,

I’m writing to voice my support for the beavers living in Oregon on public lands.

Each year the science of ecology points to the interdependence of species being needed to preserve a health environment. One example is protecting salmon species whose spawning takes them into remote areas where the decomposing salmon remains feed all parts of the local biota. Another example is the beaver whose dam building efforts provide healthy habitat for a multitude of other animals and plants.

Beavers are a critical part of a healthy ecosystem including creating wetlands, improving water quality, groundwater recharge and improving fish and wildlife habitat. I support the petition effort to ban commercial and recreational trapping of beaver on Oregon’s public and federal lands. Protecting beavers is even more important in an age of climate change as beaver dams will be critical for retaining water that will be released by earlier melting snowpack.

Protecting beaver on Oregon’s public and federal lands rather than making them available for commercial and recreational hunting is consistent with ODFW’s core mission to protect Oregon’s fish and wildlife and restore natural ecosystems.

As a lifelong Oregonian, I urge you to protect our state animal, the Beaver, a keystone species for a healthy environment. Trapping and killing beavers must be stopped.

Sincerely,

Tom Bugas
3016 N.E. Davis
Portland, Oregon 97232
bluebugtom@hevanet.com
Dear Commissioners:
As a great grand-daughter of Oregon pioneers, I learned early in life to value and cherish all of nature. Now we are relearning that beaver provide valuable support for wetlands and fish habitat. It is time to allow nature to return to her own wisdom and halt trapping and selling of beaver pelts.
Thank you for your consideration,
Emily Herbert
2120 NE Halsey
Portland OR 97232

"Voting will not save us from harm, but silence will surely damn us all." Stacey Abrams 2020
Stop beaver trapping.

Geert Aerts
30 SE 91st Ave
Portland, OR 97216
(360) 921-3476
Please-no one needs a beaver fur anything in this day & age. Please ban beaver trapping.

Sent from my iPhone
Dear Commission

Since it is time to review the rules for hunting and trapping furbearing animals, I would like to submit my comments. I oppose trapping in Oregon because I am very opposed to the suffering of animals for human pleasure or profit. I think that furbearing animals should not be trapped AT ALL. And if you decide to allow trapping, that traps should be checked every 12 hours.

Thank you
Sara Simon-Behrnes in Oregon
I do not approve of hunting and trapping fur bearing animals. Especially since trappers do not check their traps regularly, which causes immense pain and suffering for these animals as they linger and suffer with wounds until they die. Please show compassion for beavers, our state mascot, halt trapping for fur bearing animals.

Thank you,

Shannah Praus
Trapping is inhumane. One day wearing fur will be treated like smoking...banned! It is heartless and it'd time to enter the 21st century.
Good morning,

I am writing today to support an amendment to the State Furbearer regulations regarding beavers. I urge you to ban commercial and recreational trapping of beaver on federal lands to allow this iconic Pacific Northwest species to return to a larger portion of its historic range in greater numbers. Beavers, through their dams, help store more water on the land, and slow the flow of water downstream after heavy rains. This simultaneously helps to buffer forests and meadows against drought and protect downstream communities from flooding. Both drought and flooding are predicted to increase due to climate change, so the restoration of a healthy beaver population in Oregon can increase our resilience to a changing climate.

I know that beavers can cause problems to human structures, but this regulation change would still allow private landowners to deal with beavers as they see fit and would still allow problem beaver to be trapped out. It balances the need to restore natural ecosystems in Oregon with the need to protect human structures by allowing beavers to return to public lands, where they are most needed and will cause the least disruption.

I look forward to hearing about the commission's discussion of this change.

In support of Oregon's fish and wildlife,
Felice Kelly
Portland, OR
97201
202-494-2852
In the interest of the June 12th meeting regarding the renewal of rules surrounding hunting and trapping fur-bearing animals, I would like to express my wish that the ODFW ban this cruel practice.

There is no need to subject these animals to the unnecessary and harsh conditions of living in a trap for days at a time until the trapper decides to return. Often these traps cause additional unintended harm, in the case where malfunction of the trap incurs a slow and painful death of the animal. Furthermore, these rules seem to benefit an extremely small minority of the Oregon population (less than a tenth of a percent).

Oregon is at the forefront of Animal Rights ideologies, and their voter-base shows that. Please consider abolishing animal trapping.
I join with Portland Audubon Society in supporting the petition to ban commercial and recreational trapping of beaver on public federal lands.

Beaver are a critical part of a healthy ecosystem including creating wetlands, improving water quality, groundwater recharge and improving fish and wildlife habitat. Climate change makes protecting beaver even more important, as beaver dams are critical for retaining water that will be released by earlier melting snowpack.

Protecting beaver on public federal lands rather than making them available for commercial and recreational hunting is consistent with ODFW’s core mission to protect Oregon’s fish and wildlife and restore natural ecosystems.

Thank you
Kimber Nelson
Portland, OR
Please stop trapping beavers in Oregon. It saddens me greatly the intense amount of pain and suffering caused to an animal that has been trapped especially when the trappers don’t have to check the traps very often. It’s bad enough if the pain only last 24 hours. Please end this horrible archaic practice immediately. Please be kind. Please.
To whom it may concern:

I'm writing to voice my general opposition to the trapping of beavers, because a) it's cruel to the animals, and b) it's counter to the promotion of healthy ecosystems, flood control, etc. At the very least, trappers should be required to check their traps every 24 hours to somewhat limit the amount of time injured beavers are kept alive.

Thank you for all your hard work, and I'm grateful for your time.

Best regards,
Rob Neyer
St. Johns, Or.
From: Jess Holdeman <jessica_eryn@yahoo.com>
Sent: Thursday, June 11, 2020 3:20 AM
To: odfw.commission@state.or.us
Subject: Beaver Closure on Federal Lands

Hello,

I urge you to adopt the petition eliminating commercial and recreational killing of beaver on federal lands.

Thank you,
Jess Holdeman

Sent from my iPhone
Dear Sir/ Madam,
Beaver trapping is cruel and unnecessary. You are messing with the balance of nature.
Leave them alone to have their one life.
A C Wright.

Sent from my iPhone
Please don’t allow beaver trapping!
It’s cruel and goes against Oregon’s very nature, to respect nature!!

Caitlin Mullineaux
Dear Wonderful People of the ODFW Commission,

What would the landscape look like if beavers were again allowed to thrive? I know wildfire is a huge topic right now. Have you thought about the relationship between beaver habitat and wildfire? How about beaver habitat and clean water? Isn't our fresh water supply changing with the climate? Doesn't beaver play a role in increasing fresh water catchments and also catching sediments and nasty pollutants? And what about all of the other lovely living beings that thrive when beaver is happy?

Forest destruction pretty much began with beaver hats. Might we begin a new chapter of conservation with beaver protection? Let's stop trapping beaver. It's old hat!!!!

Warmly,

Heidi
Good morning,

As a ODFW Commissioner you are tasked with making decisions that will forever impact our states Fish and Wildlife. In addition to asking for you to oppose the dangerous proposal to ban beaver trapping on all federal lands in Oregon I ask you to read this very important article published today about this issue.

I also wanted to let you know that I attempted to sign up to testify but wasn’t able to successfully sign up. I kept getting errors so unfortunately I can’t testify because of it as the deadline has passed. Such a travesty to sneak this proposal in when I’m legally prohibited to attend the meeting and testify in person.

June 10, 2020

**Wildlife Professionals say Oregon beaver trapping ban Misses The Mark**

Furbearer Conservation


A proposed ban on regulated beaver trapping in (of all places) “the beaver state” has pitted wildlife officials against animal activists, and science against social discourse.
Beavers have long been associated with the early history of Oregon’s settlement, bringing commerce and trade to the region during colonial times. Their pelts still hold value to a determined sector of the state’s citizenry today. The beaver even has its own place on the Oregon state flag, and is, of little surprise, the official state animal.

However, the activities surrounding the early success and colonization of Oregon (which includes the hunting and hide processing of the beaver) has been put to the test - as the Oregon Fish and Wildlife Commission mulls over a petition to eliminate regulated hunting and trapping from all of the state’s federal forest lands, according to a release from the U.S. Sportsmen’s Alliance.

THE BEAVER LAWSUITS

Supporters assert that banning the hunting of beaver (*Castor canadensis*) on public lands may counter the environmental impacts of climate change and help protect resident species of Coho salmon. The mention of Coho salmon should come as no surprise, as Oregon found itself in a legal dust-up between USDA’s Wildlife Services, and animal rights groups threatening lawsuit action against the removal of nuisance beavers. USDA Wildlife Services, the branch of the U.S. Department of Agriculture tasked with an array of wildlife-related projects and actions, such as managing problematic animals, removed 319 “problematic” beaver across Oregon in 2018.

The previous November, environmentalist groups such as the Center for Biological Diversity (which had also sued the agency in Idaho, California, Colorado and other states for alleged “failure to comply with the National Environmental Policy Act) put the agency on notice in Oregon - planning to take USDA-WS to court over its beaver removal procedures, citing violations to the Endangered Species Act.

The primary catalyst - an alleged collection of threatened and endangered fish whom inhabit beaver-created wetlands; including - *you guessed it* - sockeye and coho salmon.

By December of that year, Wildlife Services had reportedly “ceased all aquatic mammal damage management activities in Oregon related to damage caused by beaver, river otter, muskrat, and mink o of an abundance of caution.”

BEAVER BELIEVERS - A CAUTIONARY TALE

Pouring over the pages upon pages of public commentary on the Oregon beaver proposal presents a glaring trend leaping from the swelling compiling of emailed testimony. The message is clear from bar supporters: Beavers are beneficial to the environment.

While there is a great deal of public commentary pointing to the immense benefits beavers provide the
environment - to which, I’ll add, you won’t hear any challenge to the beaver’s “keystone status” from this outdoor writer - the concept seems to be a tad oversimplified in this instance.

No doubt, the sub-aquatic rodent’s intelligence and undoubtedly admirable qualities of persistent ingenuity boost it’s importance on the landscape, that same ingenuity coupled with their successful breeding, makes them potential hazards to public safety and infrastructure when abundant offspring tal up residence in an inconvenient locale.

Whether it’s clogged culverts, felled timber, flooded yards, or contaminated water from beaver excrement, so-called “beaver believers” - who sternly champion lethal take should never be an option - are quick to cite the animal’s immense benefits while negating their impact once carrying capacity is exceeded.

Another trend from supporters appears imminent - those who support a ban on beaver trapping in these riparian areas are desperately clinging to the questionable concept that beavers will actually inhabit areas they currently don’t.

The million dollar question is why aren’t beavers currently in these areas? If you ask the supporters of beaver trapping ban, it may be because beaver trapping is prohibiting such residence to take place. However, supporters of the ban are negating one key factor - you can’t force beavers to live and propagate where they refuse to do so. All living species need integral elements to sustain life - food, water, and shelter.

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A beaver dam slows the water of the Snake River, creating a pond in Grand Teton. (Photo | NPS/Adams)

In other words, beaver habitat sustains beaver activity; regardless of whether or not licensed trappers are taking a few beaver hides each season by way of steel trap.

The Oregon trappers themselves, who've spent a great deal in the beaver's habitat, have noted in testimony that most beaver harborage in the streams and rives throughout Oregon's federal lands are river banks - in contrast to the still ponds and swamps with castor-created lodges dotting the landscape. Many of these river systems are comprised of steep, rocky banks, which often times just aren't ideal beaver habitat. To put it bluntly, beavers are most prolific where the habitat allows them to be - regardless of whether trapping and hunting takes place.
Furthermore, while it has been found that beaver habitat is sustainable for juvenile coho salmon, some reports have noted that beaver dams may actually impede coho salmon movements during periods of low water flow, thus hindering travel across natal streams.

And what of the seemingly endless pages of local testimony which contends, in the face of climate change, that beavers may hold the “key” to climatized “woke’ness”?

Beavers are said to be responsible for over 800,000 metric tons of methane per year, which scientists estimate is 200 times more than they generated in 1900. The source of all that methane gas is not from the rodent’s digestive system - but a result of building their dams.

“When (beavers) establish ponds, the flow of water is reduced, so organic plant material gets accumulated in the ponds and settles at the bottom,” says Colin Whitfield, a hydrologist with the University of Saskatchewan, who completed a two-year study on beavers and the emissions they generate in 2014. “The bottom of the pond is a low-oxygen environment, so when plant material decomposes, it becomes methane.”

Its important to note these findings are unlikely to be a big driver of climate change, as the methane generated by beavers is less than 1% of the emissions from fossil fuel. For the basis of context with regard to Oregon’s current beaver ban turmoil, however, its something to contemplate.

**SCIENCE - IN THE EYE OF THE BEHOLDER?**

As supporters claim the “science” overwhelmingly “shows” that a trapping ban on beavers would benefit endangered species and climate change, the proverbial jury is still out on whether or not these findings are being properly applied to this particular topic. Does the “punishment fit the crime” so to speak?

While a substantial amount of hunters and trappers testified in opposition to the ban proposal, wildlife professionals and biologists truly “stole the show” of driving home key points. Professionals, like the staff at Oregon Fish & Wildlife themselves, who offered their commentary on the topic as part of the hearing package:

*In the December 2019 ODFW Commission meeting, a member of the public presented a request to close beaver harvest throughout the Siuslaw National Forest (SNF) and on state lands within the Upper Nehalem watershed. The request included letters from various parties including the SNF Supervisor. Like all regulation changes, any proposal should have data and scientific evidence to support the use of a harvest closure to meet the determined goals and objectives. While this may be difficult to produce by some public parties, those expectations are especially true if the proposal comes from a science-based natural resource professional, group, or agency. As such, following the December letter, the Department spoke with SNF staff to collect that information to guide decision-making. Through those discussions and in other public comment received in support of the closure, no data nor scientific evidence has been produced regarding beaver presence-absence, beaver habitat condition and*
distribution, beaver mortality sources and indications of those sources being additive or compensatory and no empirical connection between a requested ban and desired goals have been presented.

Louder for the folks in the back - “No data nor scientific evidence has been produced regarding beaver presence-absence, beaver habitat condition and distribution, beaver mortality sources an indications of those sources being additive or compensatory, and no empirical connection between a requested ban and desired goals have been presented.”

ODFW continues…

The SNF stated other National Forests with current beaver closures observed success with those closures and those situations served as a model for their request, but did not present any data from those forests. The Department contacted those five forests to request information and of their response either limited or no data was available to provide any insight on if these closures actually benefited beaver or improved fish habitat. No positive trends have been observed and in one review of beaver data (2011-2019) across numerous forests, beaver sign was documented four times as frequently in areas open to beaver harvest (n=100) than areas with beaver closures (n=23). This data highlighted that beaver presence does not guarantee dams as 72% of the time the Forest Service found beaver sign but no dams.

ODFW testimony reinforces the notion that sustainable beaver habitat is far more impactful on beaver abundance than actions of regulated trapping and take. Furthermore, the department notes that attempt to forcibly reintroduce beaver into beneficial areas has largely failed; due in part to both lack of ideal habitat and predatory mortality. The department points out that “recent work on beaver relocation documented high beaver mortality due to large predators” which include bears, cougars, bobcats, and coyotes. Department professionals conclude that “no data nor scientific findings have identified any areas warranting a harvest closure” and propose no changes to current beaver harvest regulations.

Independent biologists also seem to echo ODFW staff sentiments.

The Oregon chapter of The Wildlife Society, a conservation organization which boasts representation from nearly 10,000 wildlife professionals, also offered commentary on the proposed ban.

**ORTWS does not recommend the adoption of either request based on our review of the best available science on current beaver populations and management strategies within the state of Oregon. A permanent ban on beaver trapping accross the Siuslaw National Forest and/or across all federal land in the state lacks data to support claims that recreational and commercial beaver trapping are limiting factors to beaver populations.**

*(Beaver) value to the ecological health of riparian systems and their ability to improve habitat for other species cannot be understated. However, management decisions that limit sustainable use of wildlife resources must be evaluated based on biological science, and demonstrate effective strategies to accomplish ecological restoration goals.*

ORTWS continues…
Permanent trapping bans would be in opposition to the well established practices of sustainable resource harvest and proven wildlife management strategies widely utilized in the North American Model of Wildlife Conservation.

Given the lack of data on negative impacts of trapping, combined with harvest data showing recreational trapping harvest rates per unit effort have been consistent, there is little indication that trapping is having a negative impact. Trapping has long been recognized as an appropriate management tool for wildlife and habitats, and significant efforts have been put forward to implement and maintain appropriate management techniques and strategies. Statewide or even regional bans on recognized management tools must be supported biologically, be limited in scope both spatially and temporally, and allow for the resumption of sustainable use when appropriate.

Organizations like the Oregon Forest & Industries Trade Council, which protects over 5 million acres, tends to agree; adding that the ODFW “has long held to high standards of policy making based on strong science.” while pointing out that “Unfortunately, in this instance, the petitioned requests to ban beaver trapping lack demonstrable evidence to prove their need or alignment with the mission of the agency.”

Other substantial groups, including the Oregon Hunters Association, The Oregon United Sport Dog Association, The Oregon Farm Bureau, Oregon Dairy Farmers Association, Oregon Trappers Association and Fur Takers of America round out the plethora of professional groups opposed to the trapping ban.

**BEAVER ARE BENEFICIAL, AS IS MANAGEMENT THEREOF**

Supporters “command” that officials recognize “current science” that beavers are a beneficial cornerstone of the environment. To their credit, there is no question that the beaver is a vital compone of watershed health, habitat creation for other organisms, and just an all around healthy stance of pristine wild beauty.

View fullsize
That said, the beaver, like most rodents, is a prolific breeder, problem-solver, and, in high enough numbers, public safety and conflict contributor. Additionally, proponents of a trapping ban are grasping to the ill-conceived notion that trapping activities create full extirpation of local beaver populations. To the contrary, regulated trapping activities do not cause targeted species to become endangered, nor are these activities, in a "recreational" sense, geared towards full eradication of the target species.

The Furbearer Conservation project stands with the observations and conclusions put forward by ODFW staff, the Oregon Chapter of The Wildlife Society, and the countless professional working groups, conservation organizations, licensed trappers, wildlife professionals, and concerned landowners, who feel the 2020 Oregon beaver trapping ban proposal is both reckless and primarily built upon a weak framework against regulated trapping and wildlife management endeavors. We implore the Oregon Fish & Wildlife Commission to reject a ban on regulated beaver management, and, at the very
least, request further non-biased research be conducted to further illuminate clarity on the topic of beaver abundance, and any potential impact on imperiled wildlife.

Jerod
Growing up in the 1950’s in Oregon I was fascinated with beavers as a child, their engineering feats with dams, their huge teeth that could fell trees and the famous alarm sounding tail. But what I remember most was that beavers were good neighbors of nature helping so many plants and animals in their neighborhoods. I was taught to “Be like a Beaver”. In other words - hardworking, and helpful to others. 
As an adult I know the “good neighbor” label really means beavers are a Keystone Species. And as scientists yourself you know how important it is to protect keystone species. Beavers impact water quality, create habitat for plants and animals including a huge number of threatened and endangered species. They inadvertently impact reduction of soil erosion and downstream flooding during heavy storms and spring snow melt and this so much more.
Will our legacy to the next generations be that we knew the incredible value of our Keystone Species and took action to make sure of their preservation and expansion to original territories? Or will our legacy be “we didn’t care enough?”
So I urge you as responsible stewards of our wildlife resources to “Be like a Beaver” and support the petition to ban commercial and recreational trapping of beaver on public federal lands.
Thank you
Emma Dugan
To whom it concerns:

I urge you to consider banning the hunting and trapping of beavers in all of Oregon. Beavers are a crucial species for watershed restoration and improving aquatic habitats. They are important for salmon, bird, and forest health and also help mitigate the deleterious effects of temperature on waterways. For these and many other reasons, please do not allow the unnecessary killing of these animals.

Thank you,

Susanna Blunt
Hello,
Please ban the trapping of fur bearing mammals. It causes terrible pain and suffering to the native creatures. We as humans can be better. If trapping must be done, please make it required traps be checked every 24 hours.
Thank you for your time, and for listening. In kindness and gratitude,
Anna Partlow
--
Anna Partlow 971-998-6138
Behavior Professional
Pronouns; she/her
Owner, Trillium Sunrise Behavior Consultation
Contracted by Oregon Developmental Disabilities Services (ODDS)
Information contained in this email & any attachment is CONFIDENTIAL under HIPAA. If you are not the intended recipient, PLEASE notify me Immediately, destroy any copies, and delete the message from your system. Additionally, refrain from disclosing the content. Thank You!
Dear Commissioners,

I am writing to tell you I am adamantly opposed to trapping! Please stop this cruel and barbaric practice, the majority of Oregonians are against this! Please represent the majority and not the private, special interest groups.

Sincerely,
Renée Espenel

Sent from my iPhone
Trapping animals is barbaric and archaic - Oregon is better than this.

Thank you,
Lesley Dodson
Dear ODFWC,

I am a resident of Portland, and would love to see beavers protected from trapping. Trapping of any animal for their pelt is cruel and strains the natural balance by imposing human consumption into the equation.

Please, do not allow this unnecessary cruelty to continue in our beautiful state.

Thank you for your consideration,
Alexis McFate
Hello - A friend just notified of the possibility of killing beavers. They are part of the natural ecosystem, and it saddens and angers to know that they might be killed. Please do not pass any bill that would allow for this kind of killing. Thank you. Susan Adams
Dear ODFW Commissioners,

As a great, great granddaughter of Oregon Trail Pioneers, my family has taught me to treasure the remarkable wildlife in Oregon. Sadly, we have had a long history of over hunting that has significantly diminished and even eradicated some of Oregon’s wildlife populations (e.g., Oregon Coast sea otters).

Consequently, please allow me to strongly support the ban on commercial and recreational trapping of beavers on public federal lands. Beavers play a very special role in our natural areas throughout Oregon. Many other species depend on beaver activities.

The entire world is facing the staggering impact of climate change. Oregon has been suffering from drought conditions for years. Beavers are our natural allies in managing wetlands, improving water quality, and providing habit for fish and other wildlife at a time when Oregon needs it most.

I am counting on you to recognize the many benefits of banning commercial and recreational trapping of beavers at this crucial time when wildlife populations are declining in Oregon. Please be the leaders of stewardship that we need to see in our state and in the world.

Thank you for your kind consideration,

Linda Hartling, PhD
lhartling@icloud.com
Roxann B Borisch

From: Ryan Kerstein <ryekerstein@gmail.com>
Sent: Wednesday, June 10, 2020 9:10 PM
To: odfw.commission@state.or.us
Subject: Proposed Furbearer Regulations for 2020-22

Dear Chair Wahl and Members of the Commission:

I offer the following comments on the Furbearer Trapping and Hunting Regulations for the 2020-2021 and 2021-2022 seasons. We understand this issue is on your agenda for the meeting of June 12, 2020. By way of background, Humane Voters Oregon was formed in 2014 to help advocate for humane treatment of animals in Oregon. We participate in policymaking proceedings before administrative agencies, the state legislature, and local governments. In addition, we participate in Oregon’s electoral process. We have board members from a variety of animal welfare organizations but are not affiliated with any other state or national organization. We have the following comments on the draft rules:

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

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

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

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

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

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

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

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

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

Thank you for considering my comments.

Sincerely,

Ryan Kerstein
June 10, 2020

ODFW Commission
Re: Oregon Furbearer Trapping and Hunting Regulations

I am a homeowner in Tillamook County who strongly supports OAR 635-050-0070. Beavers are a critical part of the Oregon environment who provide habitat for salmon, create wetlands that conserve water and protect fish, and improve migratory bird habitat.

Instead of being valued for their important role in conserving water and improving the environment, beavers have been merclessly trapped and shot. This bill will allow beaver recovery in Oregon, at least on National Forest, BLM land, wildlife refuges, National Parks and Grasslands. It is a much needed step in the right direction.

Sincerely,

Suzanne Thompson
26085 David Avenue
Rockaway Beach OR 97136
June 10, 2020

ODFW Commission
Re: Oregon Furbearer Trapping and Hunting Regulations

Oregon is the Beaver State but it has not always treated its totemic animal well. OAR 635-050-0070 provides the opportunity to do better. There is overwhelming evidence that beavers make enormous positive contributions to our environment. From flood mitigation to supporting salmon recovery to ameliorating climate change, beavers are a critical part of the Oregon environment.

Now is the time to adopt a 21st Century attitude toward beavers and to begin to remedy the mistakes of the past. Hunting and trapping beavers does not contribute significantly to Oregon's economy; aiding in their recovery does.

Sincerely,

Seth Thompson
26085 David Avenue
Rockaway Beach OR 97136
Dear Members of the Oregon Department of Fish and Wildlife Commission:

I am writing to encourage you to ban commercial and recreational trapping of beavers on federal public lands in Oregon. Beavers are an important part of our ecosystem. They protect our wetlands, protect our water quality, and create dams to guard against flooding. They deserve to be valued as part of Oregon’s natural habitat rather than needlessly removed.

Sincerely,

Diane Schauer
Hello,

As a native Oregonian and lifelong resident, I'd like to urge you to stop allowing the trapping of "furbearing" animals in Oregon.

This practice causes needless suffering of these animals. Please take a moment to imagine what it would be like to be caught in one of these traps, yourself. I doubt you will take the time to imagine this -- but I'm asking anyway. No way to eat or drink. Your foot or hand crushed and bleeding. No way to escape or get help. Nothing but pain for hours and days on end.

There is no reason to think that these defenseless animals suffer any less than you would, simply because they are a different species. To believe that they do is clearly a logical fallacy. You think they don't feel pain as acutely as you just because they don't have language?

The fact that something has been done in the past is not a reason to continue doing it in the future. Look at slavery, torture, child labor, racism, and all the other horrible things that people used to accept as normal. Now we realize they were barbaric. Don't keep allowing trapping on the basis that you allowed it yesterday or last year or ten years ago.

The fact that something can be done is also not a reason to do it.

Thank you for your time and consideration.

Scott Runkel
5151 Firwood Ct.
West Linn, OR
503-747-9394
I am completely against fur trapping. It is inhumane, unnecessary and greedy.

Valerie Huffman

Sent from Yahoo Mail on Android
Please don't allow beaver trapping. It is such a cruel way to kill an animal. Thank you.

Joanna Stiehl
As an Oregon resident, I oppose the recreational or commercial trapping of beavers.

--

Cris Waller
criswaller1@gmail.com
Dear Commissioners:

I oppose kill trapping in Oregon. It is a barbaric, out-dated practice that causes unspeakable pain and suffering to animals. There is no justification, other than a perverted recreational aspect, for fur trapping in this day and age. Now is the time to consider that we have no right to inflict this torture on creatures who feel pain as much as we do.

Please consider banning all body-gripping traps and snares in Oregon (as other progressive states such as Colorado have done), and extend that ban to include any method of trapping for beaver.

Consider also this: Trapping is unique in that it inflicts immeasurable suffering in a time and place that is remote to the one inflicting the pain. The abject pain and terror inflicted by kill-trapping is unwitnessed, and therefore palatable; making it too easy for the trappers to ignore or justify the suffering they don't see first-hand. Is this really the kind of societal value you want to uphold?

Please let this horrible practice end. Thank you.

Kate W.
15685 SW 116th Ave
Tigard, OR 97224
The Mission of the Mule Deer Foundation is to ensure the conservation of mule deer, black-tailed deer and their habitat.

June 10, 2020

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

RE: Opposition to Beaver Trapping Ban on USFS lands

Dear Chair Wahl and Honorable Commission Members:

The Mule Deer Foundation (MDF) is in opposition to the proposed amendments to OAR 635-050-0070 regarding the lands open to beaver trapping in Oregon. MDF supports regulated trapping as a viable means to wildlife management and recreation as part of the multiple-use, sustained yield mandates for National Forest lands. Regulated trapping of beaver, as evident by the science or lack thereof, is not causing wildlife to become endangered in the proposed expansion and the justification being used to propose expanded areas is not supported nor lacking. Banning beaver trapping on additional National Forest lands, without specific cause and support, can limit habitat management for other species including mule deer.

MDF supports the staff recommendations from the Oregon Department of Fish and Wildlife, which opposes the proposed amendment to OAR 635-050-0070, to banning beaver trapping in additional National Forest lands in Oregon. MDF believes that science and professional wildlife management, as lead by ODFW, should be the foundation for all wildlife decision and that proper administrative and legal process be followed for changes on federal lands.

Thank you for this opportunity to weigh in on the future of wildlife management and habitat stewardship in Oregon.

Sincerely,

Ken Hand
MDF Oregon Regional Director

CC: Curt Melcher, ODFW Director
    Doug Cottam, ODFW Wildlife Division Administrator
From: Toni O’Hara <tohara@RMEF.ORG>
Sent: Wednesday, June 10, 2020 2:54 PM
To: odfw.commission@state.or.us
Subject: RMEF comments re: Citizen Request on Beaver Trapping, OAR 635-050-0070
Attachments: 2020-06-10_RMEF Comments_ODFW Trapping.pdf

The Rocky Mountain Elk Foundation appreciates the opportunity to submit the attached comments regarding the citizen request to close public lands to recreational beaver trapping and hunting.

Sincerely,

[Signature]
Toni O’Hara | Lands & Conservation Dept. Office Administrator
Rocky Mountain Elk Foundation
406-523-0264 phone
*tohara@rmef.org | www.rmeff.org

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June 10, 2020

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

RE: Citizen Request on Beaver Trapping, OAR 635-050-0070

Dear Chair Wahl, Director Melcher, and Members of the Commission,

The Rocky Mountain Elk Foundation (RMEF) respectfully submits the following comments on the citizen request to close all National Forests, Bureau of Land Management lands, National Monuments, National Wildlife Refuges, National Parks and National Grasslands in the State of Oregon to commercial and recreational beaver trapping and hunting.

RMEF is a national hunting-based conservation organization with more than 17,000 members in Oregon. RMEF and its partners have completed 928 conservation and hunting heritage outreach projects in the state with a combined value of more than $62.3 million. These projects have protected or enhanced 806,240 acres of habitat and opened or improved public access to 133,569 acres.

The ecological benefits of beavers are well known. Wetlands created by beavers are productive systems with an abundance of water and nutrients, supporting a diversity of species. However, beaver populations—like other wildlife—require management to avoid impacts to other species, to reduce human-wildlife conflicts such as flooding, agricultural and property damage, and to maintain public safety. Regulated trapping remains the most effective tool for managing beavers and other furbearers.

RMEF supports use of the Association of Fish & Wildlife Agencies’ Best Management Practices for Trapping, and encourages the Commission to reject the citizen request on beaver trapping and approve the proposed Furbearer Regulations for 2020-2021 and 2021-2022.

Thank you for the opportunity to comment.

Sincerely,

Blake L. Henning  
Chief Conservation Officer
From: Sherry Salomon <sherrysalomon@comcast.net>
Sent: Wednesday, June 10, 2020 10:23 AM
To: odfw.commission@state.or.us
Subject: Save our beavers

Sent from my iPad
I oppose trapping and the use of snares in Oregon because it causes too much pain and suffering to our wildlife and there is always the possibility that a domestic animal may find one of these traps.

It's inhumane to have these animals suffer like this. Please don't allow this to happen.

Please consider my comments when you vote

Thank you.

Sincerely,
Lynda McMillan
Eugene, OR
A ban on federal land is not a good idea. Beavers plug culverts that flow under roads. The water backs up and will eventually cause the road to fail. It would be catastrophic to have people lose their lives when in the middle of the night they drive into a gaping hole in the roadway.

Bob Main
Coos County Commissioner

Robert "Bob" Main
Coos County Commissioner

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Dear ODFW,

Please do all you can to protect beavers in Oregon.

I do not know how much power you might have over a Federal decision, perhaps none. But please know that people do care about what happens to wild animals in Oregon. They should not be persecuted. They should be allowed to live their lives.

Thank you.

Cathy Pasterczyk
Sister of Susan Moen, who lives in Portland, directly adjacent to Beaverton.
Roxann B Borisch

From: Deborah Wessell <wessell@live.com>
Sent: Wednesday, June 10, 2020 11:03 AM
To: odfw.commission@state.or.us
Subject: Oregon needs beavers!

I'm writing in support of the petition by Portland Audubon and other conservation groups to ban commercial and recreational trapping of beaver on public federal lands.

Beaver are “nature’s engineers.” They create wetlands, improve water quality, recharge groundwater and improve fish and wildlife habitat. Protecting them is even more important in an age of climate change because beaver dams will be critical for retaining water that will be released by earlier melting snowpack.

Protecting beaver on public federal lands rather than making them available for commercial and recreational hunting is consistent with ODFW’s core mission to protect Oregon’s fish and wildlife and restore natural ecosystems.

Please adopt this petition.

Thank you,
Deborah Wessell
Portland OR
To the Members of the ODFW commission:

I am writing in support of the petition to ban commercial and recreational trapping of beaver on public federal lands.

I am a volunteer in the Soil and Water Conservation District realm, and have reviewed literature produced by ODFW and attended talks given by ODFW scientists which highlight how beaver are a critical part of a healthy ecosystem including creating wetlands, improving water quality, groundwater recharge and improving fish and wildlife habitat.

As we are experiencing an upward trend in adverse weather events and increased average temperatures, beaver dams will be critical for retaining water that will be released by earlier melting snowpack and adverse flooding events. The documented positive effects of beaver dams in lowering TMDLs, e.g. stream water temps and sedimentation should not be ignored.

Protecting beavers on public federal lands rather than making them available for commercial and recreational hunting is consistent with ODFW’s core mission to protect Oregon’s fish and wildlife and restore natural ecosystems.

Sincerely,

Susan Wedall
Dear ODFW commission,

My name is Jim Hartmann, and I teach AP Environmental Science at West Linn High School. My classes study the importance of keystone species such as the beaver and their importance to healthy ecosystem function. These animals need to be protected. I am writing to urge you to adopt the petition to ban hunting and trapping of beaver on public lands.

Thank you,

Jim Hartmann

Sent from my iPad
************ This message scanned by GWAVA Anti-Spam and AntiVirus System.
************
Hello,

I am writing to express my opinion in regard to the protection and expansion of beaver populations. I have witnessed some of the benefits on my travels along the North Fork of the Crooked River.

We know that beavers are great conservators of water resources. This is good for agriculture, fish and other plants and animals.

I am a hunter and do not oppose sensible hunting regulations, but it seems to me that whatever we can do to enhance the beaver population is a good decision. For that reason I support a ban on the trapping of beavers except in those instances they cause economic or other damage.

Sincerely,

Patrick Slabe
Commission:

No killing or harassment of beavers on federal lands.

Bobbee Murr
31 NW 22ND PL
Portland, OR 97210
Hello,
I am writing to express my support and encouragement for amending the State’s furbearer regulations to prevent commercial and recreational trapping of beaver on federal lands in Oregon. Having worked as a volunteer with organizations doing restoration and riparian restoration work, the role of the beaver is critical to the renewal and regeneration of our healthy rivers, wetlands and wildlands.

Beavers have been called “ecosystem engineers.” Their activities are critical to protecting water quality, creating habitat, groundwater recharge, and promoting biodiversity. They are a critical part of healthy northwest wetland ecosystems. Unfortunately Oregon has treated its official state animal more like a pest than an integral part of a healthy ecosystem. It is past time to change that approach and partner with the natural ecosystem processes beaver’s ensure.

Thank you,
Judy Todd, Founder & Scout
NatureConnect NW
judy@natureconnectnw.com
503-260-4995
Please protect all beavers on federal or state lands to ensure these long time residents continue to do their important work for the environment. Read the book EAGER.

Barbara Linnett
Astoria, Oregon
Dear ODFW Commission,

I am writing to request that the Commission ban commercial and recreational beaver trapping on our federal lands in Oregon. These critters provide critical ecosystem services across the state, and help build our state's resilience in the face of climate change. Restricting ongoing beaver hunting and trapping dovetails the extensive aquatic restoration investments in this state with state wildlife policy. Further, beavers provide critical habitat for many imperiled species, and contribute to the Department's mission to protect threatened and endangered wildlife.

Thank you for considering my request.

Sincerely,
Dwight Bodycott
380 W 12th St
New York, NY 10014
I strongly support the petition banning commercial and recreational trapping of beaver on public lands! Killing Beaver is not a necessary or good idea on any level. They are a proven critical part of a healthy ecosystem, creating wetlands and improving wildlife habitat, especially in these uncertain times of climate change.

We the people of Oregon depend on ODFW’s commitment to protect our wildlife from human interference and death.

Thank you,
Robyn Bluemmel
3016 NE Davis Street
Portland OR 97232
This email is to let you know that I support the petition to increase protections for beavers by banning beaver trapping on federally managed public lands in Oregon. Beavers are a critical part of a healthy ecosystem particularly in this age of climate change.

Thank you!

--
Caroline Arnold

Portland, OR
I urge you to adopt the petition eliminating commercial and recreational killing of beaver on federal lands.

This is important to us. Thank you for your consideration.
Regards,
Don and Nancy Jarbeaux
Tigard, Oregon
I urge the ODFW to ban the trapping of beavers on public federal lands. The mission of ODFW is to protect Oregon's fish and wildlife and restore natural ecosystems. Beavers are a critical part of a healthy ecosystem by creating wetlands and improving water quality.

Kathryn Sheibley
From: Robert B. Bernstein <bobbo1946@yahoo.com>
Sent: Wednesday, June 10, 2020 1:56 PM
To: odfw.commission@state.or.us
Subject: "Beaver Closure on Federal Lands"

...no taking of taking of Beaver for Commercial or Recreational purposes..
Robert B. Bernstein
Laura Webb

Sent from Mail for Windows 10
Dear ODFW Commissioners,
Thank you for serving as members of the commission.

I respectfully ask you to end commercial and recreational beaver trapping and hunting on all National Forests, Bureau of Land Management lands, National Monuments, Federal Wildlife Refuges, National Parks, and National Grasslands in Oregon. ---- Hunting and trapping beavers makes NO sense in light of the science of watershed and salmon habitat restoration and protection.

As the coordinator of the Sandy River Basin Watershed Council, in the Mt. Hood area, I spent 13 years planning and implementing numerous watershed restoration projects including beaver habitat enhancement and wetland projects. I know from first hand experience how important beavers are in our watersheds in terms of groundwater infiltration, salmon habitat and moderating stream flows. The importance of beavers is increasing as climate change advances and adversely impacts our watersheds and aquatic species.

Thank you for taking action to protect beavers as a keystone species in Oregon.
Russell Plaeger
Portland, OR
I support the petition to ban commercial and recreational trapping of beaver on public federal lands. Beaver are a critical part of a healthy ecosystem including creating wetlands, improving water quality, groundwater recharge and improving fish and wildlife habitat. Protecting beaver is even more important in an age of climate change as beaver dams will be critical for retaining water that will be released by earlier melting snowpack. Protecting beaver on public federal lands rather than making them available for commercial and recreational hunting is consistent with ODFW’s core mission to protect Oregon’s fish and wildlife and restore natural
Hello,
I'm writing in support of the petition to ban commercial and recreational trapping on beaver on public federal lands. I was baffled to learn that trapping beaver on public lands is permitted at all, given the critical role that beavers play in the ecosystem. The hunting of beaver not only threatens their population, but the habitat as a whole, and runs counter to the mission of ODFW to protect wildlife.
Sincerely,
Emily Schnipper
Portland, OR

--

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To Whom It May Concern:

I am strongly opposed to any trapping - commercial or recreational - of beaver anywhere and especially on public federal lands. Beaver are a critical part of the ecosystem. They create wetlands, help improve water quality, groundwater recharge and improve fishing and wildlife habitat.

Protecting beaver is consistent with ODFW core mission to protect Oregon’s fish and wildlife and restore natural ecosystems.

I support the petition to ban trapping of beaver and am urging you to adopt said petition.

Thank you,
Cristy Murray
Oregon City, OR
I am writing to support banning commercial and recreational trapping on public lands.

Beaver are a critical part of a healthy eco system which is needed more than ever with climate change.

It is time to stop hunting beaver and stand with ODFW mission of protecting fish and wildlife.

Sincerely

Mary Anne Joyce
1724 SE 48 Ave
Portland OR 97215

Sent from my iPad
I am concerned about all dangerous legislation to make life for our Beavers near impossible!! They are vital to the earth including their contributions of:
They are of critical part of our ecosystem in creating wetlands, improving water quality, and recharge/improve fish and wildlife habitat.
We have done enough damage to this planet we call home. Let’s start making a shift and protect these incredible creatures before it’s too late.
Hunting and trading these essential beings is a crime!! Do the right thing! Start by putting Beaver Closure on Federal Lands NOW.

Respectfully,
Jan Monical
Warren Or
503 366-5661