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**Date:** June 9, 2020

Dear Dr. Cottam,

Thank you for the opportunity to provide feedback regarding the beaver trapping ban implemented in 1972 on the portions of the Umatilla National Forest (Forest) that are within Union County. We were unaware of the trapping ban and appreciate you bringing it to our attention.

It is our understanding that this regulation was put in place during a time when trapping was more common and there were more beaver trappers in Eastern Oregon. Since then fur prices for beavers have declined and trapping pressure is low. The most limiting factor for beavers on the Forest is likely habitat (i.e. gradient, willows, etc.).

Like ODFW, we are aware that beavers play an important role on the landscape and are a keystone species to the health and function of watersheds. Although trapping is likely not the main variable impacting beaver populations on the Forest, we recognize that individual beavers can be important in improving watersheds. We are interested in restoring functional and resilient ecosystems on the Forest and would like to see beavers re-established in areas that can support them. We do have remnant populations of beaver on the forest in fringe habitat and we have observed that if beaver habitat exists then there is often beaver present.

We have provided a response to your questions from your letter dated April 20, 2020 below.

- **What was the goal and objectives of each closure?** We do not have this information to our knowledge. Since this trapping ban was implemented nearly 50 years ago, there are no Forest Service employees with the institutional knowledge that recall the objectives of this specific closure or even the closure itself.
- **Have objectives been achieved?** We do not know the answer to this question for the reasons mentioned above and because we have not monitored beaver populations or their habitat in the intervening years since the trapping ban was implemented.
- **What ongoing empirical monitoring data has been collected and how is it used to evaluate these closures?** None
- **Have any USFS policies or practices been modified to accommodate or accompany these closures? If so, please explain. For example, beaver habitat improvements include restricting livestock access, increasing early-seral habitat in riparian areas, hardwood plantings, and terminating hardwood conversions.** Not that we are aware of, although the Forest has implemented many habitat improvements that beavers may benefit from across the Forest, but none that we know of that specifically accompany this closure.



- **Did beaver populations increase following these closures and what empirical data was used to make this determination?** We do not know. Reasons are covered in the previous responses. Although we have not conducted specific monitoring related to beaver, we have indicated their presence/absence during stream monitoring.

I apologize for the delayed response and we wish we could provide you with more substantial information regarding the impacts of this trapping closure. Please don't hesitate to reach out if you have other questions or concerns.

Sincerely,

*/s/ Eric Watrud*



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