

Via Email: odfw.commission@state.or.us

May 21, 2020

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

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

Dear Chair Wahl and Members of the Commission:

The undersigned organizations support the request before the Oregon Fish and Wildlife Commission to modify the proposed furbearer trapping and hunting regulations and close commercial and recreational beaver hunting and trapping on the following federally managed public lands in the state of Oregon:

National Forests, Bureau of Land Management lands, National Monuments, Federal Wildlife Refuges, National Parks, and National Grasslands.

Federally managed public lands are major sources of water for agricultural and municipal use and provide vital intact fish and wildlife habitat to large areas of Oregon. As the needs of Oregonians for water increase, so do the economic, social and ecological concerns related to the impacts of droughts and wildfires on the livelihood of our communities and on the health and abundance of fish and wildlife. Across Oregon, federal agencies, state land managers, private industries, utilities, conservation organizations, watershed councils and others have spent enormous amounts of time and money on stream/riparian habitat restoration in an attempt to improve water flows, watershed conditions, and species recovery. Many of these efforts try and mimic the activities of beavers and would be greatly enhanced, expanded, or maintained, at little to no cost, by the presence of active beaver colonies on these federally managed public lands. The existing regulations continue to allow the removal of beaver colonies and therefore hinder and in some cases reverse these restoration efforts, wasting taxpayer dollars and frustrating partners.

Under the existing regulations, the beaver hunting and trapping closures are widely separated, limited in size, and erratic. In some places, the main stem of a river is closed to beaver hunting and trapping, while its tributaries remain open. Elsewhere, the closure varies within a national forest from county to county. In other cases, closures switch repeatedly across different federal public land boundaries. This lack of consistent, easily understood regulations makes enforcement difficult and prevents beavers and their water, fish, and wildlife benefits, from increasing on these federally managed public lands. The proposed amendment to OAR 635-050-0070 would simplify the regulations, enable enforcement, and expand beaver benefits statewide.

Closing these federally managed public lands to commercial and recreational beaver trapping and hunting would allow numbers to increase and would restore these critical systems statewide at a scale that is economically and ecologically meaningful. It is for these reasons that Siuslaw National Forest, after spending millions of dollars on Coho salmon habitat restoration, formally requested that the Commission close the Forest to commercial and recreational beaver trapping and hunting. The need

that the Siuslaw National Forest has for this closure is felt across the state and supports the requested closure on the above mentioned federally managed public lands.

Beavers are critical to functioning watersheds, building and maintaining dams that benefit hundreds of other flora and fauna, including migratory birds and species protected under the Endangered Species (Rosell et al. 2005; Nummi and Holopainen 2014). Ecosystems exhibit remarkable restorative characteristics wherever beavers are at work (Law et al. 2017). Conserving beavers wherever they occur on federal lands could be key to achieving conservation objectives. Given the many, global threats to biodiversity, federal public lands will become increasingly important for conserving rare and declining habitat types, providing for habitat connectivity, and supporting species contending with habitat loss, climate change and other factors. Besides above-mentioned benefit to Coho salmon, beavers restore habitats for other endangered species in Oregon such as the spotted frog, bull trout and Chinook salmon.

The requested changes would not prevent private landowners or state land managers from allowing commercial and recreational trapping and hunting as this request only applies to the above federally managed public lands. Nor would the requested change hinder any efforts to remove beavers in response to damage on these federally managed public lands if non-lethal solutions to a conflict proved inadequate.

The closure of commercial and recreational beaver trapping and hunting across these federally managed public lands in Oregon would greatly assist and optimize the ongoing aquatic restoration efforts statewide. It would dovetail with efforts by the various entities working to restore stream/riparian conditions in a way that benefits all Oregonians. Thank you for consideration of the request as you revise the Furbearer Trapping and Hunting Regulations.

Sincerely,

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Cascadia Wildlands

John Talberth
President and Senior Economist
Center for Sustainable Economy

Greg Haller
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