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Working to protect and restore Western Watersheds and Wildlife

May 27, 2024

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

RE: FURBEARER REGULATION CHANGES FOR BEAVER

Dear Commissioners,

In November 2020, after receiving a petition and extensive testimony about the need to close beaver trapping on federally managed public lands, the ODFW Commission directed a diverse working group to make recommendations to the Commission regarding beaver management in the context of climate change, habitat benefits to fish and other species, and water retention and temperature.

Based on the resultant May 2022 "Recommendations for Beaver Management on Federal Land from the Oregon Fish and Wildlife Commission Beaver Management Work Group to the Oregon Fish and Wildlife Commission," (hereafter, "BMWG Report"), and the emphasis on closing priority watersheds to beaver hunting and trapping, we, the undersigned, request that the Commission enact a closure to beaver trapping and hunting on federally managed public lands amending OAR 635-050-0070 with a report to the commission documenting the ecosystem effects, including to water resources and to fish and wildlife populations after ten years.

Our request is in keeping with the many well-known benefits documented in the BMWG report "to humans and other wildlife through improved ecosystem services, increased economic benefits, increased climate resilience, and enhanced biodiversity conservation benefits" of having beaver inhabited floodplains. (See pages 6 and 7 of the report).

Our request for a trapping prohibition on all federally managed public lands is necessary because the BMWG Report documented, "Scientists and wildlife managers do not have a comprehensive understanding of the beaver population in Oregon nor is there an agreed-upon

method to model beaver populations,” and that ODFW does not know where key beaver habitat is on federally managed public land. (See page 9, emphasis added).

The Commission needs to act now, as the BMWG Report explicitly said it, “does not propose “doing nothing”, or making no changes to current beaver management, while waiting for additional data to be collected. (See page 11, emphasis added) The BMWG Report identified critical objectives to improve the management of beaver and beaver habitat as quickly as possible” within the existing regulatory frameworks (e.g. the furbearer regulations now before you). The report also recognized that ODFW has “sufficient justification to take immediate and direct actions to maximize beaver modified floodplain landscapes in priority areas on federally managed public lands and to be a leader in ensuring that collaborative, concurrent monitoring is undertaken to understand the impacts of these management actions.” (See page 13 emphasis added).

The BMWG Report suggested assessing modifications to the hunting and trapping regulations to meet objectives including:

- Changing the method, magnitude, location, and season of take.
- Setting bag limits and/or allowing for take only where beaver density is high. (emphasis added)
- Closing areas to harvest where beavers are being translocated onto federal land, where habitat restoration action is occurring and where beaver are either effectively managing floodplains and their gains need to be supported, or where beaver are not adequately managing floodplains, and their recovery and improvement need to be support. (emphasis added)
- Identifying the specific geographic area and duration of closures.

Distressingly, years after that report was concluded, ODFW has not proposed any changes to current beaver management to restore beaver populations on federally managed public lands to move towards and achieve environmental benefits. ODFW does not know where beaver densities are high, nor where the floodplains are being effectively managed by beavers.

The recent creation of ODFW Beaver Emphasis Areas as part of ODFW’s “3-Year Action Plan for Beaver-Modified Landscapes” (2023) are well intentioned and do serve an important interim study purpose. However, these newly created areas are insufficient because they do not serve to protect populations and they provide no regulatory mechanism to curtail hunting and trapping (the only cause of mortality that we can directly control).

Again, we ask that the Commission enact a closure to beaver trapping and hunting on federally managed public lands amending OAR 635-050-0070 with a report to the commission documenting the ecosystem effects, including to water resources and to fish and wildlife populations after ten years.

Sincerely,



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