

Exhibit E

**Public correspondence received as of
October 28, 2020**

Roxann B Borisch

Subject: FW: Grande Ronde Model Watershed Ripples newsletter -- beaver articles
Attachments: Ripples_SummerFall2020.pdf

From: Suzanne Fouty <suzannefouty2004@gmail.com>
Sent: Tuesday, October 27, 2020 11:39 AM
To: ODFW Commission <odfw.commission@state.or.us>
Cc: Suzanne Fouty <suzannefouty2004@gmail.com>
Subject: Grande Ronde Model Watershed Ripples newsletter -- beaver articles

Good morning Commissioners --

The Grande Ronde Model Watershed in La Grande has just published its Summer/Fall 2020 newsletter. There are two articles about beavers, one which deals with engaging communities in a citizen science effort related to beavers and one that address wildfire. The third article is on Lidar and its ability to expand the speed at which we assess habitat conditions. I thought the newsletter worth sharing given the upcoming November meeting to vote on our petition to initiate rulemaking. If the Commission decides to initiate rulemaking, it would mean that the public would be allowed to engage in an inclusive and transparent way on the important topics of ecosystem restoration and wildfire and drought preparation via the contributions made by beavers and the habitat they create and maintain. The newsletter is fun and engaging and hopeful.

All the best.

Suzanne Fouty

RIPPLES IN THE GRANDE RONDE



RIVERS UNITING NEIGHBORS · QUARTERLY NEWS FROM THE GRANDE RONDE MODEL WATERSHED



Become a Community Scientist!
HELP NATURAL RESOURCE PROFESSIONALS COLLECT DATA
by Ian Wilson, *GRMW staff*

As Oregonians, we value fish, wildlife, and clean water as well as conservation of these resources. Fortunately, we have a partner that can create and maintain these resources now and into the future. Our official state animal, the North American beaver (*Castor Canadensis*), was once abundant in Oregon and throughout North America. Through successive generations of dam-building and sediment deposits, our landscapes were transformed by beavers into fertile valleys that have benefited humans, fish, and wildlife alike. However, an intense fur trade in the 19th century and alterations to stream channels and riparian vegetation in the 20th century have reduced our iconic neighbor to a nuisance animal known for blocking culverts and felling one too many trees.

I often tell people that beavers do my job of restoring streams, but



North American beaver (*Castor Canadensis*)

they do it better and cheaper than I can. So, how can we ensure more beavers are on the landscape to provide these valuable ecosystem services? First, we need to understand where they are and what kinds of habitat they prefer to help natural resource managers make informed decisions and create conditions favorable for beavers to colonize.

Continued on page 2, **iNATURALIST**

... continued from front page, **iNATURALIST**



Beavers are the state animal of Oregon and have earned a place on the state flag.

Community science data collection efforts are a proven method for collecting meaningful data that can be used by scientists and naturalists. The Cornell Lab of Ornithology has used community science to gain a better understanding of bird populations and migration patterns.

Recognizing the need to collect additional information on beavers, the Grande Ronde Model Watershed teamed up with local natural resource managers to create the Northeast Oregon Beaver Survey on iNaturalist (<https://www.inaturalist.org/home>). iNaturalist is an online platform for community members, biologists, and anyone interested in learning more about the natural world. Observations and locations of animals, plants, and insects are reported, discussed, and mapped, which helps all of us understand the biodiversity around us. Using iNaturalist

is easy, and we would really appreciate your help with this project. More eyes on the ground will allow us to learn how to prioritize this species. Here are the steps to join the Northeast Oregon Beaver Survey project:

1. Download the app on your phone and create an account.
2. The next time you are enjoying the outdoors and come across beaver activity or signs, take a picture.
3. Open the iNaturalist app and go to the “add observations” section.
4. Upload your photo to the Northeast Oregon Beaver Survey and answer a few questions.

We developed a training module that walks you through how to set up an account and record observations. It can be found by copying and pasting the link below into your browser or simply searching Northeast Oregon Beaver Survey on YouTube.

A few notes of special importance that will be covered in the training video: 1) we recommend obscuring the location when recording the observation to avoid unintentional targeting of beavers, and 2) always seek consent to collect data on private land and let the landowner know the data will be available to the public.■

Northeast Oregon Beaver Survey

Training Module



iNaturalist



12 / 3826

CC

<https://www.youtube.com/watch?v=tQFtxshipBM&feature=youtu.be>

BEAVER WETLANDS, WET MEADOWS, AND PONDS

Creating Wildfire Safety Zones and the Possibility of Survival

by Suzanne Fouty, Ph.D., *Hydrologist*

WILDFIRE – a large, destructive fire that spreads quickly over woodland or brush. It is unpredictable, able to turn on a dime and race in the other direction if the winds and terrain and conditions are right. What does it mean to be wildlife, livestock, or people faced with such an unpredictable natural element – one that burns and renews? One that leaves charred remnants of homes, memories, animals, and lives but also triggers new growth and future possibilities?

Even before the fires began this September, wildfire was on people's minds (Figure 1). While they have always been part of the landscape, wildfires now occur in a changing climate and on a changed landscape. Where tall ponderosa pines once stood, capable of withstanding most wildfires, they now burn, the forests in parts of the state having filled in with ladder fuels allowing fire to reach high into their canopies.



Figure 1: May 29, 2020, front page of the Capital Press.

Where native grasses once flourished, there is now cheatgrass and other invasive species that burn hot, carry fire, and return before native plants. Where lush and diverse wet meadows and wetlands once flourished, filled with migratory birds and mammals, there are now encroaching conifers, weeds, and annuals, responding

to the lowered water table, or fields growing hay or produce, or homes. Once stream systems seasonally flooded their adjacent valleys, recharging the water table. Now, water rushes past these areas in the spring because streams are confined to over-wide and incised channels. The landscapes along their way are left parched and the groundwater recharge process that sustained the stream systems and banked water for the drought years is all but eliminated.

DROUGHT – a prolonged period of abnormally low rainfall, leading to a shortage of water. In Oregon, drought is frequent and tends to cover broad areas (Figure 2). Like wildfire, it is unpredictable in terms of its location and severity each year. However, unlike wildfire, drought can persist for months, returning sometimes for years in a row (Figure 3). When it comes, especially if there are multiple years of

drought, streams and reservoirs run low and the grasses crunch underfoot, ready to burst into flames. To wildfire and drought, there is no urban-rural divide or east side-west side divide; there is only the changed landscape, the weather, and the interaction of the two.

Yet, once upon a time, stream corridors were filled with beavers creating and maintaining

Continued on page 4, BEAVERS

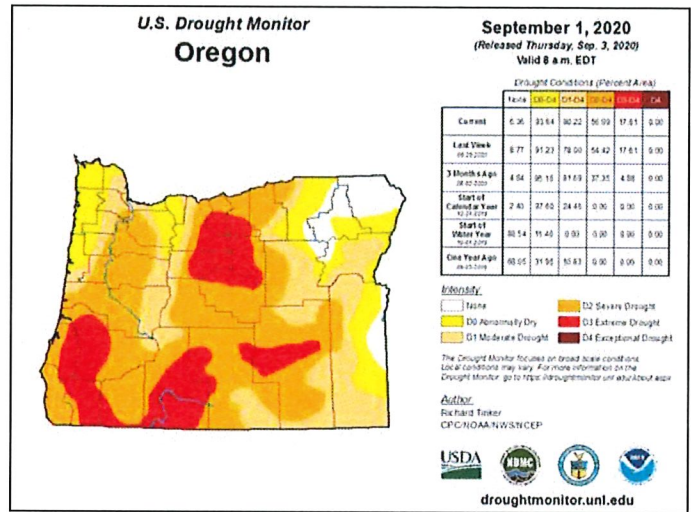


Figure 2: September 1, 2020, drought map showing most of the state in moderate to severe drought.

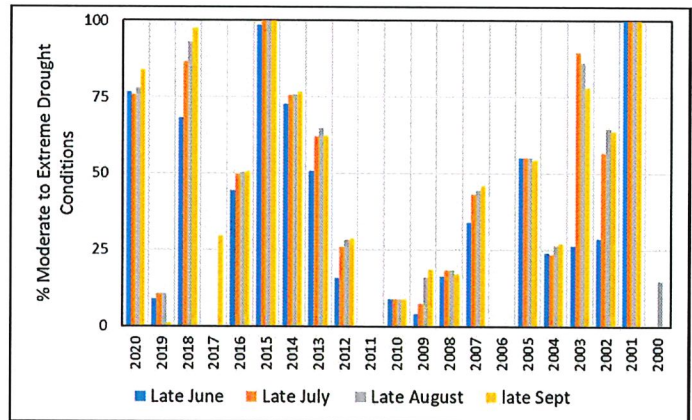


Figure 3: Percentage of the state in moderate to extreme drought conditions from late June to late September over the past 20 years. Data from the U.S. Drought Maps.

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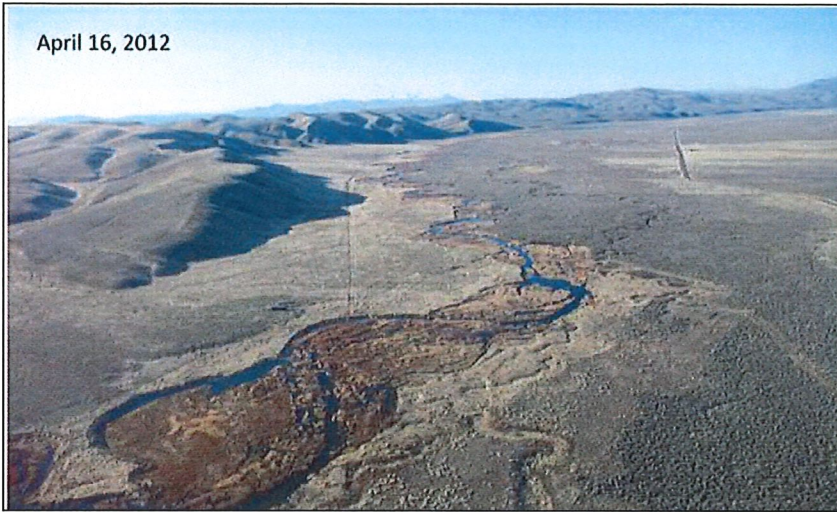


Figure 4: Maggie Creek, Elko County, Nevada. This area is in moderate to severe drought yet has 28 miles of water-abundant landscape due to abundant beaver dams and continued good livestock management. Note the lush vegetation in wetlands vs. dry uplands. (Photo: Carol Evans)

complex, water-rich habitats that were highly resistant to disturbance (Figure 4). These wetlands, wet meadows, ponds, and riparian areas served as wildfire safety zones, fire breaks, and water banks for the dry years. They were places of refuge during and after a wildfire, providing habitat and forage as winter approached, and sustenance the following year as the uplands began their slower recovery. But these complex, water-rich habitats are mostly gone as a result of human land uses. No longer do wildfires have to leap across lush, green zones or sputter out. Now, they frequently burn across a narrow riparian zone to the water's edge, taking all safety and refuge. While narrow riparian zones will recover the next year, during the in-between time, there is no food or habitat to wait out the winter months. Instead, there is often only exposed soil, charred remains, declining water quality, and quiet. This is our current reality and will be our future one unless we make different choices. And, it turns out, one of those choices is whether we are willing to share space with beavers and allow them to once again create water-rich habitats that restore water back onto and into our dry landscapes in advance of, and in preparation for, a wildfire or drought (Figures 5, 6, and 7).

The unpredictability of wildfire and drought means that these wetlands, wet meadows, riparian zones, and ponds must be abundant, large, and widely distributed across the state. They must occur on federally managed public lands, on state and county public lands, and on willing private lands if they are to provide the refuge and habitat needed when a wildfire occurs or drought settles across an area. The beauty of these water-rich habitats, created and maintained by beavers, is that they provide services beyond just wildfire safety zones and water banks. They also quietly capture and store carbon, improve water quality and fish and wildlife habitat, lower stream temperatures, provide for migratory birds, and sub-irrigate fields and improve yields. But it is during wildfire and drought that their value becomes most visible.

Every wildlands firefighter knows to identify the safety zone where they can run to, deploy their shelters, and have the chance of survival. Stewardship of our wild and human communities and of our firefighters requires that we do no less than create as many and as large and widely distributed safety zones as possible because it's not just about surviving the fire, but also its aftermath (Figure 8). Success in this endeavor requires we partner with beavers because we don't have the time, the skill, or the dollars to do it ourselves. They, in contrast, are master builders of wetlands,

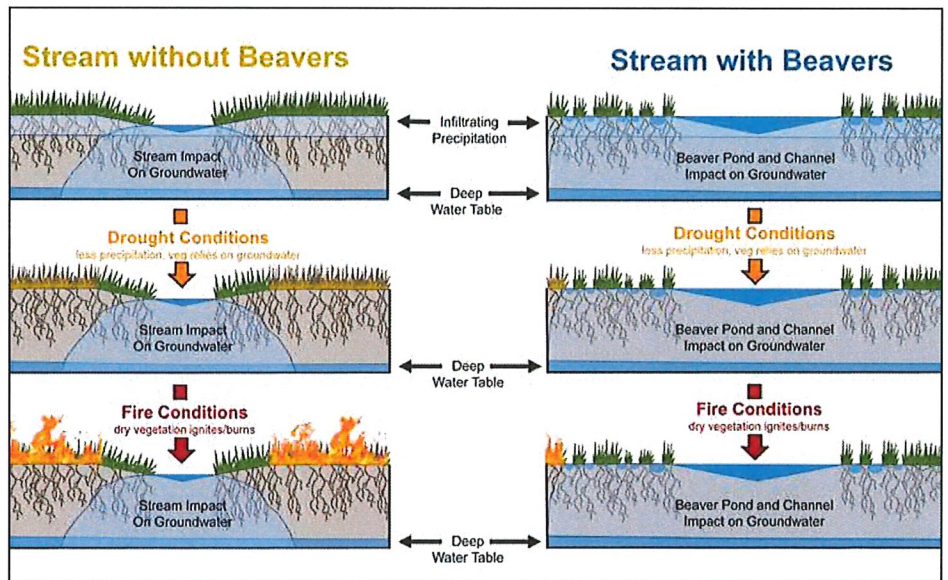


Figure 5: Conceptual model of vegetation response to normal conditions (top), drought (middle), and fire (bottom) in creeks without beavers (left) and with beavers (right). (Figure: Fairfax and Whittle, 2020)



Figure 6: Price Creek, Montana (1998). Section of the creek without beaver dams and ponds. Area downstream of Figure 7. (Photo: Suzanne Fouty)



Figure 7: Price Creek, Montana (1995). Section of the creek with beaver dams and ponds. Area upstream of Figure 6. (Photo: Suzanne Fouty)

beavers has been greatly reduced and suppressed.

It is not enough to simply want wildfire safety zones and water banked for the drought years. A partnership with beavers is required, and this partnership will take work, patience, and acceptance of their strengths and challenges. They are amazing, industrious, and determined. They are also annoying and frustrating when they plug culverts, flood fields or roads, or cut down prized trees. But humans are ingenious and also determined, and most of these

wet meadows, riparian areas, and ponds, and they do it for free while providing a host of services for humans, fish, wildlife, and, of course, beavers.

challenges can be easily resolved in ways that allow beavers and their benefits to remain.

Fire will return. Sooner or later, it will be our community preparing to evacuate as the flames race down hillsides and touch rooftops. It will be our streams with dead fish because they could not survive the elevated stream temperatures and our fields that are struggling. If we want wildfire safety zones to be there when flames light up the hillsides and begin their race in front of the winds, if we want safety zones for wildlife, livestock, and people to find refuge in before the air becomes too hot to breathe and flames touch flesh (Figure 9), then we need to begin now. Even these master builders will require time to recreate the needed water-rich habitats because the number of

Thus, as we reflect on the September wildfires that changed lives forever on the west side, as we wonder about when it will be our turn to make the hard choices and experience the great losses, we are faced with these questions: Are we, am I, willing to give beavers the space they need create their complex water-rich habitats, and in return gain wildfire safety zones, water banks, quality fish and wildlife habitat, and improved water quality? Are we, am I, willing to seek solutions to conflicts with beavers other than removal and death? Can we, can I, acknowledge their contributions to our collective future? Is it

*Continued on page 8, **BEAVERS***



Figure 8: Beaver ponds provide an "emerald refuge" in a landscape burned by the Sharps Fire in Idaho. (Photo: Joe Wheaton)



Figure 9: Elk taking refuge in the East Fork Bitterroot River on August 6, 2000, during the Sula Complex Fire on the Bitterroot National Forest. (Photo: John McColgan)

What's All the Buzz?

Remote Sensing to Evaluate River Health and Fish Habitat Conditions

by Seth White, *Columbia River Inter-Tribal Fish Commission*

Over the last month, you may have noticed an increase in airplane traffic flying low overhead. So, what's all the buzz about? Please forgive our temporary disturbance; what you likely saw or heard was an aircraft fitted with a specialized sensor for laser imaging, detection, and ranging (known as "Lidar"). Lidar is not harmful to humans, fish, or wildlife and is an emerging approach to assessing river health and fish habitat quantity and quality.

In summer 2020, the Columbia River Inter-Tribal Fish Commission (CRITFC), Grande Ronde Model Watershed, and Bonneville Power Administration collaborated on the use of Lidar to assess river conditions across 76,188 acres of the Grande Ronde River and Willowa

and helping to plan river restoration projects.

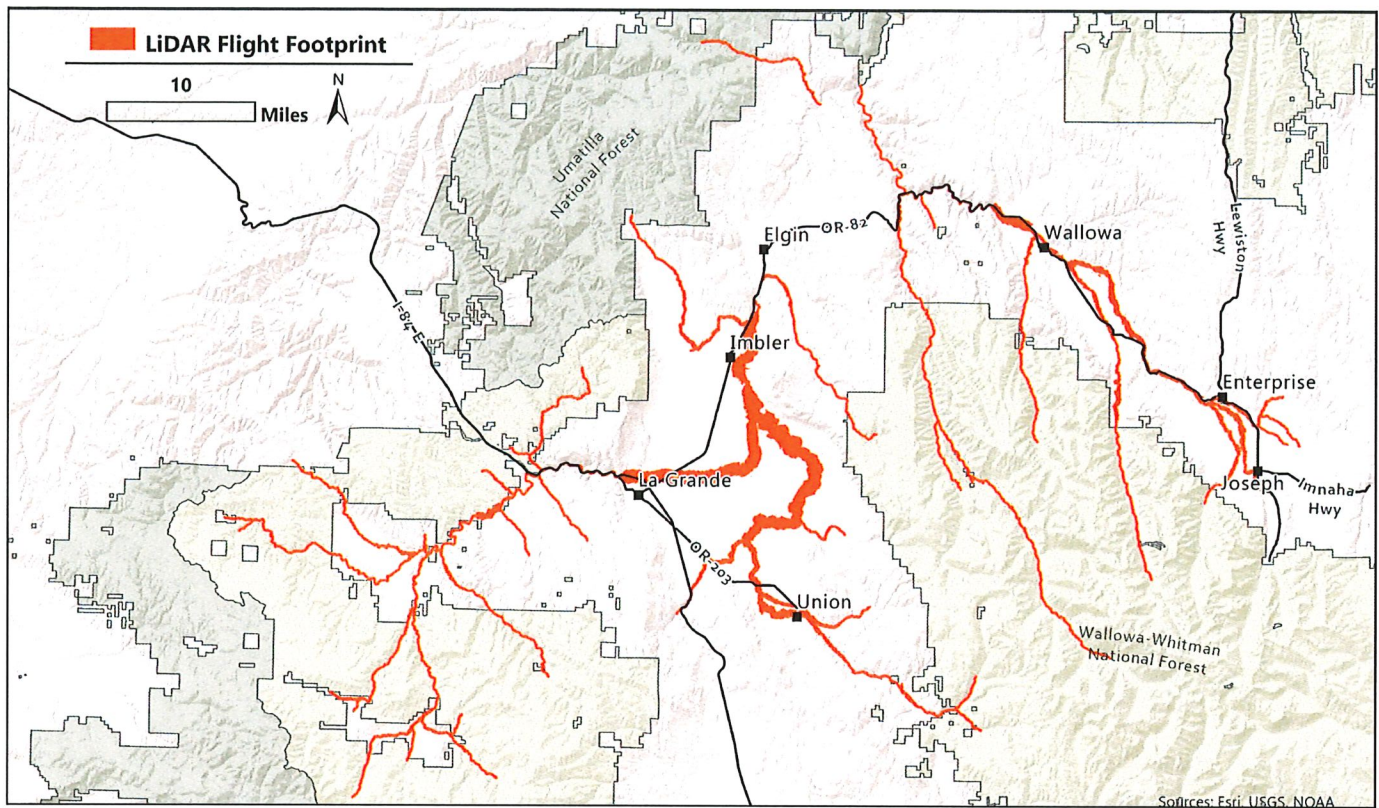
The Lidar was collected by a private contractor, Quantum Spatial, Inc. (previously Watershed Sciences), the same company that collected Lidar here around 2010. The 2010 data collection project employed terrestrial (or "red") Lidar that evaluated the height and density of riparian vegetation and width of the river channel, coupled with remotely sensed water temperature data (thermal infrared, or TIR), to create a water temperature model to help plan for river restoration. This previous Lidar dataset can be directly compared with the new data to assess riparian shrub and tree growth over a decade. This rare

River watersheds, including not only mainstem riparian conditions and floodplains but also larger tributaries currently or historically occupied by Chinook salmon and steelhead-rainbow trout.

The year 2020 has been a year of surprises, including COVID-19's impact on our ways of life, either directly or indirectly through quarantine and social distancing. It was under these circumstances that CRITFC made the difficult decision not to hire field crews in 2020. This decision was based on the desire to minimize in-person contact between field staff and rural communities to keep everyone safe. Therefore, the option to collect remotely sensed Lidar data was a good "Plan B" that is already yielding useful information for assessing watershed conditions



A plane like this one could be seen flying low across the basin to collect Lidar data. (Photo: Steve Raber)



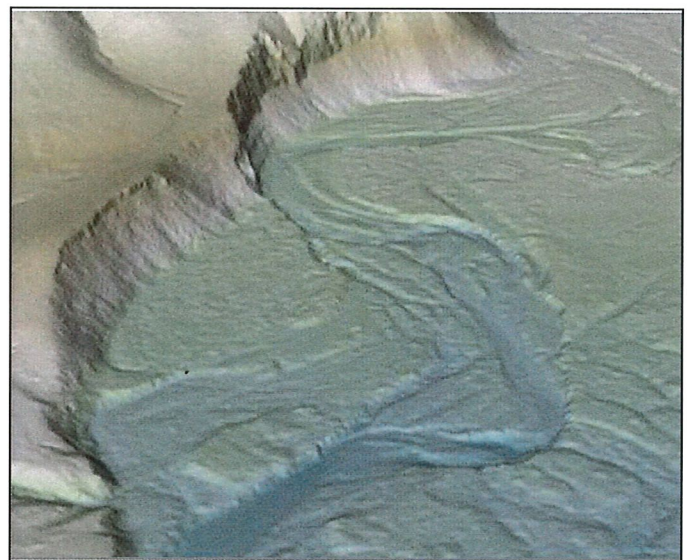
The above map shows the coverage area of the new 2020 topobathymetric Lidar. The total area equates to 76,188 acres! (Map: Grande Ronde Model Watershed)

opportunity to evaluate vegetation change over a long time period and across many river miles is expected to reveal insights into what kinds of restoration efforts were most effective in promoting riparian health.

In 2020, we used topobathymetric (or “green”) Lidar, which, unlike red Lidar, penetrates the water’s surface for mapping water depths so that critical fish habitat, such as large, deep pools, can be quantified continuously over many river miles. Green Lidar allows us to map fish habitat across large portions of the watersheds in a manner of days that would otherwise take decades for field crews to complete.

Does the emerging use of Lidar and other remotely sensed technology signal the end of the time-honored tradition of hiring field crews? Absolutely not! These remote tools will help field crews, interns, students, and citizen scientists complete the kinds of data collection efforts that airplanes, drones, and satellites still can’t accomplish, such as counting fish during snorkel surveys, searching for aquatic insects in the river, and ground-truthing physical habitat measurements to ensure accurate and precise remote sensing.

So please pardon our buzz...It’s just a new era of habitat data collection by your friendly fish biologist neighbors!■

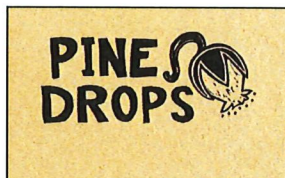


Lidar-derived bare earth topobathymetric digital elevation model (DEM), Shitike Creek, Oregon. (Figure: Seth White)

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acceptable for society, land managers, private citizens, for me to ask firefighters to protect property, put out fires, and put themselves at ever-increasing risk while doing nothing to improve conditions on the ground in those areas that were once rich in water and complexity? These are deeply personal questions as well as community, state, and federal agency questions. How agencies, communities, and individuals answer them and the decisions that follow will determine much about the future that awaits our wild and human communities.

Fairfax, E. and A. Whittle. (2020). Smokey the Beaver: beaver-dammed riparian corridors stay green during wildfire throughout the western USA. Ecological Applications. 18p. ■



Looking for a GRMW shirt or hat in Joseph? You can now purchase them locally, thanks to The Sports Corral! Drop in and check out their inventory.

We'd like to extend our appreciation to Blue Mountain Outfitters in La Grande for their continued support by selling our shirts, hats, and stickers. Also, thanks to our screen printer and artist, Ashley Barnes of PineDrops, and Moonlight Graphics for printing our hats. If ever you need a shirt, hat, tote bag, or sticker and can't visit one of these retailers in NE Oregon, please message us on Facebook or send an email to orders@grmw.org. We always have inventory on hand at our office and are willing to ship items for a fee if needed. ■

**Grande Ronde Model Watershed
UPCOMING BOARD MEETINGS**

**Tuesday, November 24th, 2020
5:00 p.m.**

*Location To Be Determined
please call for information*

The public is welcome to attend.

COVID-19 Update: Meetings will be available virtually. Please call to request information.

(541) 663-0570
Thank you!

**Grande Ronde
Model Watershed**
1114 J Avenue | La Grande OR 97850
Ph. 541-663-0570 | Fax 541-962-1585

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Protecting Oregon's Wildlife, Habitat and Hunting Heritage

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oha@oregonhunters.org • oregonhunters.org

October 26, 2020

Chair Wahl, Commissioners, and Director Melcher,

The Oregon Hunters Association strongly opposes the submitted petitioned requesting a ban on recreational and commercial trapping of beavers (*Castor canadensis*) on federal land within the state. Any broad sweeping change to established rule must be based in exhaustive, state-specific scientific research; unfortunately, there is no such research to support a change at this time.

This topic was discussed at length in June, prompting the commission to sanction the creation of two workgroups to address concerns regarding trapping and beaver population health. The workgroup model of bringing stakeholders to the table to find collaborative solutions and investments in scientific research has served the department, and the commission, well on other difficult wildlife issues. Not only does this process yield a measured approach with an emphasis on science-based management, it builds trust among the stakeholder community, the department, and the commission. A dismissal of this process in favor of adopting a contentious and ill-researched assertion would erode that trust, impacting future collaborative efforts.

OHA supports the ODFW staff in their recommendation to deny the petition. We urge the commission to deny the petition and instead focus on research and scientific analysis to address the questions of beaver population density, habitat, predation, and overall species health before making any large-scale change to established wildlife management and regulation.

Sincerely,

Fred Walasavage
OHA Chair

Roxann B Borisch

From: Michelle Tate
Sent: Tuesday, October 27, 2020 8:33 AM
To: Derek J Broman
Cc: Roxann B Borisch
Subject: FW: Oregon petition to ban beaver trapping
Attachments: BMP_Beaver.pdf

From: Terry Cheek <terrycheek63@gmail.com>
Sent: Tuesday, October 27, 2020 7:28 AM
To: odfw.commission@state.or.us; dhastings@furtakersofamerica.com
Subject: Oregon petition to ban beaver trapping

As a trapper and member of the FTA, I would like to voice my objection to the commission's consideration of banning beaver trapping. Furbearer management has proven itself as the best method of sustaining healthy populations of furbearers and preventing damage to private and public property. There are current models known as best methods and practices in place nationwide that are very successful. As a trapper, outdoorsman, and conservationist I ask that you please utilize proven techniques before creating a problem that will be very difficult if not impossible to control.

Please find one example of Best Methods and Practices for the beaver pdf. attached.

Respectfully
Terry Cheek
N.C. trapper

Roxann B Borisch

Subject: FW: Opposition to resubmitted petition banning beaver trapping on federal lands
Attachments: Opposition to Banning Beaver Trapping on Federal Lands within Oregon (1).pdf

From: Joel Strimling <canoealoha@gmail.com>
Sent: Monday, October 26, 2020 9:10 PM
To: odfw.commission@state.or.us
Subject: Opposition to resubmitted petition banning beaver trapping on federal lands

Honorable Commissioners of the Oregon Department of Fish & Wildlife,

Please find a letter attached from concerned groups in regards to this matter. We greatly appreciate your review of all and hope this letter suitably expresses our concerns and our wish to take part in any processes.

Please feel free to reach out to any of the included signees for further information.

Sincerest regards,

Joel Strimling
President, Oregon Outdoor Council

Dear Fish & Wildlife Commissioners,

10-26-20

We the undersigned are writing to express our grave concern and alarm with the recent resubmission of the proposal to ban beaver trapping on Federal Lands within the state. The petition is a rehashed copy of the prior petition submitted earlier this year that was dismissed by the Commission in favor of a collaborative workgroup of stakeholders, researchers, and department staff. This petition again claims to support fishery recovery and enhancement without any sound scientific data while also circumventing the standard and agreed-upon processes of setting policy and law, in opposition to ODFW's biologist recommendations who support the continued current beaver trapping regulations.

It cannot be understated that there has been a lack of science in this petition and that requests for evidentiary information from the proposers have not been responded to—research and investigation yield the opposite from ODFW's biologists, independent researchers, and OSU ecologists. Oregon Department of Fish and Wildlife biologists and staff recommended opposing the beaver-trapping bans based upon their quantifiable scientific data. "Staff proposes no changes to beaver regulations. The Department will continue with discussions and pending investigations with various partners around Oregon to assess and address riparian habitat functionality for a suite of fish and wildlife species... Researchers continue to investigate beaver habitat and situations of beaver presence but no dams, but their recent work on beaver relocation documented high beaver mortality due to large predators. The Oregon coast range has robust populations of bears, cougars, bobcats, and coyotes and predation is most likely the highest source of beaver mortality in the coast range and elsewhere (*ODFW Biologist report as part of ODFW Commission minutes)."

Decades of science demonstrate that regulated trapping has helped to recover populations by providing the tools for scientific research while at the same time funding millions of dollars for said research. "In modern times, several key furbearer species have been recovered from the brink of extinction and now are sustainably harvested as a result of modern furbearer management and regulated trapping. Trappers are an important part of this management regime, which is critical to the sustainable use, management and conservation of furbearer species along with numerous other species that may be impacted by furbearers including endangered plants and animals, waterfowl and other species. (The International Journal of Wildlife Management Studies)*" Many further examples have been included in prior letters in opposition to this petition, and it is not professional nor appropriate to repeat previously yielded data and factual information taking the commissions valuable time. We would eagerly and happily again provide any such communication via web conferencing, as a member of the beaver working group (per the previous commission meeting), or by correspondence. A petition of this seriousness should be informed by scientific data, all stakeholders in the workgroup, and ODFW staff to make an informed decision.

This resubmission of the petition is ultimately most alarming as it steps outside of the bounds of protocol and legal standing. Oregon Furbearer regulations are set every two years. Hearing this petition opens the door for any group to continually resubmit proposals at their choosing

and follow no rules of procedure as outlined in statutes and by the Oregon Department of Justice. This will negatively impact other important fish and wildlife considerations. Based on both previous decision and legal precedent the only option in this instance is to reject this petition outright. Regulatory procedure is the rule of law and what holds all parties together, to the table, and to engage each other in the process. Hearing of this petition would erode trust in the Commission's methods and create affective polarization between groups, leading to a lack of objective collaboration. This would result in bickering with no semblance of procedure nor evidence, the ODFW Commission locked squarely in the middle of the vocal storm.

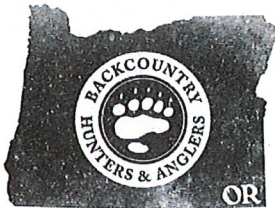
We appreciate your valuable time reviewing this letter, and we invite you to engage with our group leaders for any questions. We implore an abject dismissal of this out of place and improperly resubmitted petition.

Sincerely,

Joel Strimling
President | Oregon Outdoor Council
oregonoutdoorcouncil.org



Ian Isaacson
Chair | Oregon Chapter of Backcountry Hunters & Anglers
backcountryhunters.org/oregon



Jacob Hupp
Sportsmen's Alliance-Associate Director of State Services
sportsmensalliance.org



Tammy L. Dennee
Executive Director Oregon Cattlemen's Association
orcattle.com



Mary Anne Cooper | Vice President of Public Policy
Oregon Farm Bureau
oregonfb.org



Aoibheann Cline
Western States Coordinator | Congressional Sportsmen's Foundation
congressionalsportsmen.org



David Hastings
President | Fur Takers of America
furtakersofamerica.com



References:

*2020–2021 and 2021–2022 Oregon Furbearer Regulation Proposals

https://www.dfw.state.or.us/agency/commission/minutes/20/06_Jun/EXHIBIT%20E/Exhibit%20E_Attachment%203_2020-2022%20Oregon%20Furbearer%20Proposals.pdf

*the International Journal of Wildlife Management Studies

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4662097/#CIT0098>

Roxann B Borisch

Subject: FW: Sportsmen's Alliance letter urging the commission to deny the citizen petition to ban beaver trapping on federal lands

Attachments: Sportsmen's Alliance Letter in Opposition to Citizen Rulemaking Proposal- Beaver trapping Oregon.pdf

From: Jacob Hupp <jhupp@sportsmensalliance.org>

Sent: Friday, October 23, 2020 9:31 AM

To: odfw.commission@state.or.us

Subject: Sportsmen's Alliance letter urging the commission to deny the citizen petition to ban beaver trapping on federal lands

Hello,

Attached to this email is a letter detailing the Sportsmen's Alliance opposition to the recently filed citizen petition to ban beaver trapping on federal forest land. The Alliance on behalf of our Oregon members, we urge you to deny the petition, as it undermines wildlife conservation, stands in opposition to the departments biologist opinions and the misuses the regulatory rulemaking process at the ODFW. Please accept this letter into the public record at the November 13th commission meeting. Please let me know if there is a more appropriate way to submit comments into the record. Thank you.

Best,

Jacob Hupp

Sportsmen's Alliance-Associate Director of State Services

jhupp@sportsmensalliance.org

(740) 516-9422





October 23, 2020

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

Dear members of the Oregon Fish and Wildlife Commission:

The Sportsmen's Alliance, is a leading national organization that fights detrimental legislation and regulations that seek to diminish or destroy our American outdoor heritage. I am writing today on behalf of our Oregon members requesting this commission move to deny the recently filed citizen petition to ban beaver trapping on federal forest land.

Current Oregon regulations allow for sustainable beaver trapping on federal public land and these regulations should be maintained as is. Trapping is an integral part of the North American Conservation Model and as such the ability to do so should be protected.¹ Trapping is managed through scientifically-based regulations and is one of the more strictly regulated outdoor activities in North America.²

Recognizing the connection between successful wildlife conservation, sportsmen, and biologists, most state fish and wildlife agencies heavily involve sportsmen in fish and wildlife decisions. Oregon allows interested persons to petition an agency requesting the promulgation, amendment, or repeal of a rule. Unfortunately, special interest groups use this as a pathway to outlaw common hunting and trapping practices through commission rulemaking. The citizen rulemaking petition that led the commission to outlaw marten trapping set a dangerous precedent by prompting the commission to consider ideas that have no scientific basis and then adopt them into law. The rulemaking petition process was never intended to undo seasons and bag limits that are scientifically proven to be sustainable.

In a previous attempt to enact similar changes to the beaver trapping regulations, the proponents of the effort claimed that increasing wild populations of beavers would lead to more Coho salmon in Oregon's rivers and streams. After the previous petition failed due to a

¹ The Wildlife Society, *The North American Model of Wildlife Conservation*, Technical Review 12-04 (December 2012), <http://wildlife.org/wp-content/uploads/2014/05/North-American-model-of-Wildlife-Conservation.pdf>.

² Association of Fish and Wildlife Agencies, *Furbearer Management* <https://www.fishwildlife.org/afwa-inspires/furbearer-management>.

lack of scientific basis, the proponents of a ban have quickly regrouped and now argue that the state's Climate and Ocean Change Policy, which provides that wildlife shall be managed to prevent the serious depletion of any indigenous species, requires the state to limit beaver trapping. ODFW's own biologists found the current beaver trapping regulations will have no negative impact on beaver populations as a result of trapping. Specifically, ODFW decided to maintain the existing furbearer regulations because (1) trapping and hunting beavers during the breeding and pregnancy season has no effect on population numbers and distributions, (2) all suitable habitat is occupied in the state, (3) a beaver colony of six requires 18 acres of willows every year, and (4) there are no major economic effects of the existing rule.³ Petitioners have failed to refute any of these four points in their petition, and further provide little scientific justification for their request to change the trapping regulations.

Further, just a few months ago, this commission called for beaver trapping working groups to work through these very issues. Sportsmen have made good faith efforts to have open and public dialogue with the petitioners and the commission to make our case for sustainable harvest, and will continue to do so. When the commission makes a decision we as sportsmen feel it is our duty to follow through and follow the commission's decisions, whether or not we agree with them. The petitioners appear to be trying to work around these working groups through the citizen petition process without producing the scientific data required to make the changes they seek. Instead, they are using the rulemaking process to undermine wildlife conservation efforts. We urge the commission to continue to follow the North American Model of Wildlife Conservation. At the very least the petition should be denied at this time and Oregon should move forward with beaver trapping work groups as decided in the June commission meeting.

The Oregon Fish and Wildlife Commission should decline to regulatory changes when petitioners (as here) are unable to supply clear scientific evidence and there is no agreement among the leading biologists that change is necessary. We believe the citizen's petition process is being abused by the proponents with continued submission of petitions with limited scientific support. Making wildlife decisions that are not based on real science and contradict the recommendation of state wildlife biologists can have dangerous consequences. We are afraid that accepting citizen provisions without consideration of reliable scientific facts will create a slippery slope. If a citizen's petition can successfully end sustainable beaver harvest what will prevent a rulemaking petition from outlawing mule deer, elk or duck seasons? We ask this commission to stand with the North American Model of Wildlife Conservation by protecting the role of sportsmen and supporting the opinions of state biologists.

It is for these reasons the Sportsmen's Alliance and our Oregon members urge you to vote no on any changes to current beaver trapping regulations.

³ Oregon Fish and Wildlife Commission, Minutes, pg. 8 (Jun. 12, 2020).

Best personal regards,

Jacob M. Hupp
Associate Director of State Services
Sportsmen's Alliance

Roxann B Borisch

From: David Hastings <davechastings@gmail.com>
Sent: Saturday, October 24, 2020 8:38 PM
To: odfw.commission@state.or.us
Subject: Letter RE Beaver in OR
Attachments: DHastings OR DFW letter 10.2020.pdf

Categories: printed

I would appreciate it if this letter (Attached) could be added to the Commission packet for the upcoming meeting regarding Beaver Management in OR.

Thanks very much for your help with this!

Dave Hastings



Fur Takers of America

Dave Hastings, President
6 Shady Acres
Lemoync, NE 69146

Phone (308) 355-2439

davechastings@gmail.com

TO:

FROM: Dave Hastings, President, Fur Takers of America

RE: Petition to Ban Beaver Trapping

The petition under consideration regarding a ban on Beaver trapping on Oregon public lands is a misguided move, and contrary to science and data. It is bad for Oregon, bad for wildlife conservation, and ultimately bad for beaver.

We know that regulated trapping is part of a management plan that maintains consistent, healthy populations of Beaver.

We know that Beaver are a keystone species, and the North American Model of Wildlife Management has an inherent motive to maintain and sustain healthy populations of wildlife.

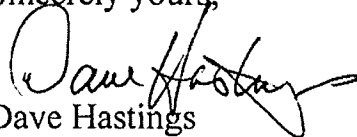
We know that, during the past century, the model has created the most robust populations of wildlife in the world, and Beaver populations nationally have flourished under this model.

We know that science and fact should be paramount in making management decisions. The experts in the ODFW have regularly and consistently presented data that clearly argues a trapping ban would not enhance the populations.

Wildlife management decisions responding to the whims of nationally funded and supported advocacy groups, especially those that choose to ignore data and science, will spell disaster for Beaver, and for wildlife management.

Please do not throw away a century of success on whimsical, contra-logical policy.

Sincerely yours,


Dave Hastings

Roxann B Borisch

From: ODFW WildlifeInfo
Subject: FW: Beavers - excellent 6 minute video - very relevant to the petition

From: Paul Engelmeyer
Sent: Thursday, October 8, 2020 10:13 AM
To: maryodfw@gmail.com; Jill Zarnowitz ; Becky Hyde ; ODFW.Commission@state.or.us
Subject: Fwd: Beavers - excellent 6 minute video - very relevant to the petition

Hello Commissioners - Here is an excellent 6 minute video very relevant to the petition.

Hope all is well - stay healthy.

Paul Engelmeyer
Portland Audubon Society / Wetlands Conservancy

<https://www.facebook.com/1697401333842849/posts/2654938138089159?sfns=mo>

Roxann B Borisch

From: ODFW WildlifeInfo
Subject: FW: Public comment

-----Original Message-----

From: chuck erickson <cerickson97838@yahoo.com>
Sent: Saturday, October 3, 2020 8:01 PM
To: ODFW Commission <ODFW.Commission@coho2.dfw.state.or.us>
Subject: Public comment

<https://www.beavercoalition.org/guidebook>

CONFIDENTIALITY NOTICE:

A river without salmon is a body without a soul.

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Roxann B Borisch

Subject: FW: OAR-635-050-0070

From: Dean Borgeson <dborgeson@crosslake.net>

Sent: Tuesday, September 22, 2020 5:34 AM

To: odfw.commission@state.or.us

Subject: OAR-635-050-0070

Dear Commissioners:

Please support the amendment to the "Oregon Furbearer Trapping and Hunting Regulation" in accord with the petition submitted on September 10th 2020:

"Permanently close commercial and recreational beaver trapping and hunting on the following federally-managed public lands and the waters that flow through these lands in the state of Oregon: Bureau of Land Management lands, National Forests, National Monuments, National Parks, National Grasslands, and Federal Wildlife Refuges."

In light of the fire damage being seen this year across the state, this small step toward lowering the risk of future fires is one obviously needed remedy.

Sincerely,
Dean Borgeson

Roxann B Borisch

From: Robert Rutkowski <r_e_rutkowski@att.net>
Sent: Friday, September 11, 2020 11:04 AM
To: odfw.commission@state.or.us
Cc: Keith Abouchar
Subject: End Beaver Trapping, Hunting on Federal Lands

Curt Melcher, Director
Commission Members
Oregon Department Of Fish and Wildlife
4034 Fairview Industrial Drive SE
Salem, OR 97302
Main Phone (503) 947-6000 or (800) 720-ODFW [6339]
Email: odfw.commission@state.or.us

Re: End Beaver Trapping, Hunting on Federal Lands

Dear Director and Commission Members:

Conservation groups filed a petition, https://www.biologicaldiversity.org/species/mammals/pdfs/Oregon_Beaver-Petition.pdf, yesterday asking the Oregon Fish and Wildlife Commission to permanently close commercial and recreational beaver trapping and hunting on the state's federally managed public lands and the waters that flow through them. Beavers are Oregon's official state animal, but they can be legally hunted and trapped with few limits.

The Oregon Fish and Wildlife Commission discussed this request in June as part of its review of the state's furbearer regulations. But it was rejected then as being outside the scope of that rulemaking notice.

Yesterday's petition initiates a new rulemaking process for the commission's consideration.

Federal and state agencies, watershed councils, utility companies, conservation groups, and private landowners spend countless hours and millions of dollars every year to restore Oregon's waterways, mimicking the natural behavior of beavers. At the same time, Oregon's Department of Fish and Wildlife permits limitless commercial and recreational trapping of beavers and does not even monitor populations. The department's beaver trapping and hunting regulations are outdated and directly undermine the extensive, ongoing restoration of our water resources and efforts to recover imperiled salmon populations.

Beavers are a keystone species and offer widely recognized ecological, economic, and social benefits, today's petition notes. Beaver-created and maintained habitat improves water quality, decreases the impacts of floods, and restores natural water flows. This benefits humans and a wide variety of fish and wildlife, including highly endangered coho salmon. Beavers therefore play an important role in improving Oregon's water security and minimizing impacts of climate change on human and wild communities.

Beavers are our natural allies in the fight against climate change. Oregon is the Beaver State, and it's appalling that beavers are still hunted and trapped. This cruel practice favors a few people and deprives other Oregonians and endangered salmon of the benefits of beaver-created habitat.

Few people in Oregon trap or hunt beavers. But the petition points out that the annual culling of the species has significant negative effects on beaver populations and their corresponding social, economic and ecological benefits. The petition's requested changes wouldn't affect hunting and trapping opportunities elsewhere but they would allow beavers to thrive on federally managed public lands.

Many people don't know just how critical beavers are to functioning watersheds that, in turn, benefit hundreds of other plants and animals, including threatened and endangered species. Beaver conservation on federal lands could be key to the conservation success of such species and their ability to survive and adapt to climate change impacts.

Beaver populations have been significantly reduced from historic levels through hunting and trapping. These ongoing practices suppress population growth and expansion into large swaths of unoccupied suitable beaver habitat.

Yours sincerely,
Robert E. Rutkowski

cc:
Legislative Correspondence Team
1705 Longworth House Office Building
Washington DC 20515
Office: (202) 225-4131
Fax: (202) 225-4300
keith.abouchar@mail.house.gov

2527 Faxon Court
Topeka, Kansas 66605-2086
P/F: 1 785 379-9671
E-mail: r_e_rutkowski@att.net

PUBLIC CORRESPONDENCE

Received September 11, 2020 to October 27, 2020

**Subject: Please Ban Beaver Hunting and Trapping on our
Federal Lands**

56 individuals submitted the attached letter

Roxann B Borisch





















































From: Lasha Wells <cocobuddr@gmail.com>
Sent: Friday, September 11, 2020 5:00 PM
To: ODFW Commission
Subject: Please Ban Beaver Hunting and Trapping on our Federal Lands

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,
Lasha Wells
6243 3rd Ave S
Saint Petersburg, FL 33707

FROM	SUBJECT	RECEIVED	SC...
Date: Last Week			
 Melania Padilla	Please Ban Beaver Hunting and Trapping on our Federal Lands	Wed 10/21/2020 7:12 AM 2...	
Date: Two Weeks Ago			
s klof	Please Ban Beaver Hunting and Trapping on our Federal Lands	Sat 10/17/2020 12:25 PM 1...	
Debra Curci	Please Ban Beaver Hunting and Trapping on our Federal Lands	Fri 10/16/2020 2:06 PM 2...	
Sergio Padilla	Please Ban Beaver Hunting and Trapping on our Federal Lands	Thu 10/15/2020 11:51 A... 2...	
 Shelley Coss	Please Ban Beaver Hunting and Trapping on our Federal Lands	Mon 10/12/2020 7:18 AM 2...	
Christine Schneebeli	Please Ban Beaver Hunting and Trapping on our Federal Lands	Sun 10/11/2020 8:21 PM 2...	
Robert M And Carol G Reed	Please Ban Beaver Hunting and Trapping on our Federal Lands	Sun 10/11/2020 8:27 AM 2...	
freddie williams	Please Ban Beaver Hunting and Trapping on our Federal Lands	Sun 10/11/2020 8:12 AM 1...	
Date: Three Weeks Ago			
Mark Mansfield	Please Ban Beaver Hunting and Trapping on our Federal Lands	Sat 10/10/2020 5:16 AM 2...	
Melanie Feder	Please Ban Beaver Hunting and Trapping on our Federal Lands	Fri 10/9/2020 11:11 PM 2...	
Juanita Rinas	Please Ban Beaver Hunting and Trapping on our Federal Lands	Fri 10/9/2020 12:10 PM 2...	
Bill O'Brien	Please Ban Beaver Hunting and Trapping on our Federal Lands	Fri 10/9/2020 8:30 AM 2...	
Theodora Sullivan	Please Ban Beaver Hunting and Trapping on our Federal Lands	Fri 10/9/2020 7:41 AM 2...	
Peggy Schramm	Please Ban Beaver Hunting and Trapping on our Federal Lands	Fri 10/9/2020 6:10 AM 2...	
Terrie Williams	Please Ban Beaver Hunting and Trapping on our Federal Lands	Fri 10/9/2020 5:54 AM 2...	
David Jackson	Please Ban Beaver Hunting and Trapping on our Federal Lands	Fri 10/9/2020 3:01 AM 2...	
Meryl Pinque	Please Ban Beaver Hunting and Trapping on our Federal Lands	Fri 10/9/2020 1:54 AM 2...	
Mary Eastman	Please Ban Beaver Hunting and Trapping on our Federal Lands	Fri 10/9/2020 1:43 AM 2...	
Patricia Dangle	Please Ban Beaver Hunting and Trapping on our Federal Lands	Fri 10/9/2020 1:29 AM 2...	
Jorge De Cecco	Please Ban Beaver Hunting and Trapping on our Federal Lands	Thu 10/8/2020 9:16 PM 2...	
Danika Esden-Tempski	Please Ban Beaver Hunting and Trapping on our Federal Lands	Thu 10/8/2020 8:47 PM 2...	
Dianne Douglas	Please Ban Beaver Hunting and Trapping on our Federal Lands	Thu 10/8/2020 8:37 PM 2...	
Caryn Ackerman	Please Ban Beaver Hunting and Trapping on our Federal Lands	Thu 10/8/2020 8:27 PM 2...	
Nena Cook	Please Ban Beaver Hunting and Trapping on our Federal Lands	Thu 10/8/2020 7:50 PM 2...	
linda farmer	Please Ban Beaver Hunting and Trapping on our Federal Lands	Thu 10/8/2020 7:06 PM 1...	
Jordan Salmanowicz	Please Ban Beaver Hunting and Trapping on our Federal Lands	Thu 10/8/2020 6:47 PM 2...	
Laura Chinofsky	Please Ban Beaver Hunting and Trapping on our Federal Lands	Thu 10/8/2020 6:37 PM 2...	
Judy Marti	Please Ban Beaver Hunting and Trapping on our Federal Lands	Thu 10/8/2020 6:36 PM 2...	
Patricia McDonald	Please Ban Beaver Hunting and Trapping on our Federal Lands	Thu 10/8/2020 5:06 PM 2...	
rhonda lawford	Please Ban Beaver Hunting and Trapping on our Federal Lands	Thu 10/8/2020 4:47 PM 2...	
Ali Van Zee	Please Ban Beaver Hunting and Trapping on our Federal Lands	Thu 10/8/2020 4:47 PM 2...	
Janice Banks	Please Ban Beaver Hunting and Trapping on our Federal Lands	Thu 10/8/2020 4:35 PM 1...	
doug krause	Please Ban Beaver Hunting and Trapping on our Federal Lands	Thu 10/8/2020 4:30 PM 1...	
Carolyn Anderson	Please Ban Beaver Hunting and Trapping on our Federal Lands	Thu 10/8/2020 4:21 PM 2...	
Beverly Foster	Please Ban Beaver Hunting and Trapping on our Federal Lands	Thu 10/8/2020 4:18 PM 2...	
Melody Taylor	Please Ban Beaver Hunting and Trapping on our Federal Lands	Thu 10/8/2020 3:12 PM 2...	
Gwen Stone	Please Ban Beaver Hunting and Trapping on our Federal Lands	Thu 10/8/2020 3:09 PM 2...	
Lisa Mazzola	Please Ban Beaver Hunting and Trapping on our Federal Lands	Thu 10/8/2020 2:02 PM 2...	
Ruth Quinones	Please Ban Beaver Hunting and Trapping on our Federal Lands	Thu 10/8/2020 2:01 PM 2...	
Judith Hazelton	Please Ban Beaver Hunting and Trapping on our Federal Lands	Thu 10/8/2020 1:58 PM 2...	
Philip Simon	Please Ban Beaver Hunting and Trapping on our Federal Lands	Thu 10/8/2020 1:34 PM 2...	
naomi cohen	Please Ban Beaver Hunting and Trapping on our Federal Lands	Thu 10/8/2020 1:27 PM 1...	
Jennifer M	Please Ban Beaver Hunting and Trapping on our Federal Lands	Thu 10/8/2020 1:22 PM 2...	
Ken Martin	Please Ban Beaver Hunting and Trapping on our Federal Lands	Thu 10/8/2020 1:10 PM 2...	
Rocky Reuter	Please Ban Beaver Hunting and Trapping on our Federal Lands	Thu 10/8/2020 12:59 PM 2...	
Lasha Wells	Please Ban Beaver Hunting and Trapping on our Federal Lands	Thu 10/8/2020 12:58 PM 2...	
Leslie Burpo	Please Ban Beaver Hunting and Trapping on our Federal Lands	Thu 10/8/2020 12:56 PM 2...	
jeanette capotorto	Please Ban Beaver Hunting and Trapping on our Federal Lands	Thu 10/8/2020 12:56 PM 1...	
James Mulcare	Please Ban Beaver Hunting and Trapping on our Federal Lands	Thu 10/8/2020 12:56 PM 2...	
Angela Black	Please Ban Beaver Hunting and Trapping on our Federal Lands	Thu 10/8/2020 12:50 PM 2...	

! ☆ □ @	FROM	SUBJECT	RECEIVED	SC..
	John Deddy	Please Ban Beaver Hunting and Trapping on our Federal Lands	Thu 10/8/2020 12:47 PM 2...	[F]
Date: Last Month				
	Michelle Tate	FW: Please Ban Beaver Hunting and Trapping on our Federal Lands	Wed 9/30/2020 10:43 AM 1...	[F]
↳	Linda Jones	Please Ban Beaver Hunting and Trapping on our Federal Lands	Tue 9/29/2020 6:32 PM 2..F..	✓ [F]
	Karl Bachman	Please Ban Beaver Hunting and Trapping on our Federal Lands	Sat 9/19/2020 3:36 AM 2...	[F]
	Jim Sheridan	Please Ban Beaver Hunting and Trapping on our Federal Lands	Mon 9/14/2020 7:38 PM 2...	[F]
	Lasha Wells	Please Ban Beaver Hunting and Trapping on our Federal Lands	Fri 9/11/2020 5:00 PM 2..p.	[F]