

ODFW Trap Check Work Group  
Wednesday, August 11<sup>th</sup>, 2021, 2pm-4pm PT  
Zoom Meeting - <https://www.youtube.com/watch?v=fjv2y8uUTlw>

Participants:

- Mary Anne Cooper, Oregon Farm Bureau
- *Kyle Williams (alternate for Mary Anne Cooper), Oregon Forest & Industry Council*
- Kelly Peterson, Humane Society of the United States
- *Susan Getty (alternate for Kelly Peterson), Humane Society of the United States*
- Jim Soares, Oregon Trappers Association
- Tyler Dungannon, Oregon Hunters Association
- *Amy Patrick (alternate for Tyler Dungannon), Oregon Hunters Association*
- Bob Sallinger, Portland Audubon
- Quinn Read, Center for Biological Diversity
- Jill Zarnowitz, ODFW Commission
- Greg Wolley, ODFW Commission
- Derek Broman, ODFW Wildlife Biologist
- Shannon Hurn, ODFW Deputy Director
- *Kevin Blakely (alternate for Shannon Hurn), ODFW Deputy Administrator*
- Lauren Smith, Association of Oregon Counties

Absent:

- Michelle Tate, ODFW

Guest Presenters:

- Kevin Christenson, APHIS Wildlife Services
- Jeffrey Flores, APHIS Wildlife Services
- Sergeant Isaac Cyr, Wildlife Division, Oregon State Police
- Stan Steele, Retired, Wildlife Division, Oregon State Police

Facilitation Team

- Jamie Damon, Kearns & West
- Samantha Meysohn, Kearns & West

**Welcome, Agenda Review, and Updates**

Jamie Damon, Kearns & West facilitator, opened the meeting, welcomed participants and guest speakers to the ODFW Trap Check Work Group, and provided an agenda overview.

**APHIS Wildlife Services and Wildlife Control Operators Presentation**

Jeff Flores, the Oregon State Director of USDA APHIS Wildlife Service, introduced himself and invited Kevin Christensen, Assistant Oregon State Director, USDA APHIS Wildlife Services to present to the group. Kevin has worked with APHIS for over 20 years in Oregon. He shared that APHIS has over 100-year history of addressing human-wildlife interactions, especially in agricultural contexts. The 1931 Animal Damage Control Act empowered APHIS to be the subject matter experts to solving wildlife conflicts. APHIS must abide by the wildlife management laws of each state they operate. The National

Wildlife Research Center in Fort Collins, Colorado center develops and refine methods for dealing with conflicts.

APHIS is responsible for providing the best available solutions for addressing wildlife issues such as animal damage as it relates to agriculture, aviation and public safety, oil spills, wildlife disease, and supports USFWS for protecting species.

Kevin responded to the 26 questions sent to Wildlife Services in advance of the meeting (Appendix 1).

The Trap Check Work Group Members asked the following questions:

**Question: Who is the author of the Best Management Practices (BMP) for Trapping of Furbearers?**

Answer: H. Bryant White et al. 2020 The BMPs are available here:

<https://wildlife.onlinelibrary.wiley.com/doi/full/10.1002/wmon.1057>

**Question: Why are 2% of non-target animals not released from traps?**

Answer: Some are not released because they are caught in kill traps and are killed or sustain injuries.

**Question: If Wildlife Services is called about a coyote, if they see a coyote, can they use firearms instead of trapping?**

Answer: Yes, if Wildlife Services is called for a damage situation, and there is need for lethal action, the coyote is likely nearby. Wildlife Services will attempt to call the coyote to shoot it with a firearm rather than using a trap. All take and physical activities are reported in our database including property, date, species, methods, etc.

**Question: Since Wildlife Services follows the trap check laws of each state, how does Wildlife Services accomplish the trapping of coyotes in places that require a 24-hr trap check?**

Answer: Catching coyotes can be challenging because they are smart animals. In rural areas, they may be more sensitive to human scents, and checking traps frequently could mean low success of catching the animal. In more urban settings, coyotes may not be as wary of people. However, it is still possible to trap coyotes with a shorter duration trap check time. In places with shorter trap checks, Wildlife Services may set out more traps in an area to increase the chances of capture. If the laws of the state require Wildlife Services to check those traps frequently, they will work within the constraints they have.

Comment: A work group member added that of the 36 states that have 24-hour trap checks, most are Eastern states, so the landscapes are different, and comparing trapping in Eastern states and Oregon is like comparing apples and oranges.

**Question: Does ODFW refer to the Wildlife Services take database when considering management of Oregon wildlife?**

Answer: Derek Broman, ODFW, answered that they evaluate the take from Wildlife Services when suggesting furtaker harvest. They also include the information in the Commission Packets. Catch per unit effort is an indication of population trends. Kevin Christensen added that they work closely with ODFW on conducting take analysis.

**Question: Does APHIS ever work with non-employed license trappers?**

Answer: No, APHIS does not sub-contract work.

**Question: What proportion of Wildlife Services are in rural and urban areas?**

Answer: In urban areas, there is high amount of effort because it is a high people/pet conflict area, and it's challenging to find secure locations. There is a huge amount of work done at the urban/suburban interface. APHIS will follow-up with the group with more specific answers and data.

**Question: Should APHIS attend all Trap Check Work Group meetings as a regular attendee?**

Answer: Kevin listened to the first trap check meetings and felt they could have provided information in a timely manner to the group had they been involved. It would be helpful for Wildlife Services to be present.

Jamie thanked Kevin and Jeff for presenting and invited Kevin Blakely with Oregon Department of Fish and Wildlife (ODFW) to share about the Wildlife Control Operator Program.

Kevin Blakely presented a brief presentation on the role of Wildlife Control Operators (WCO). Wildlife damage control statutes are meant to address agriculture, and mostly work in rural and urban-rural interface. The 2003 Senate Bill created a Task Force to look at WCO activities with the purpose of creating a system to license and permit WCOs. The process created division 435 rules that were adopted in 2006. In 2014 an advisory group was formed to make adaptive management adjustments to the WCO rules and implemented fees.

Kevin spoke about what OAR 635-435-0015 says about permitting. Permits are required if the WCO has charged a fee; if they are taking bats, furbearers, unprotected mammals, and Western gray squirrel; if wildlife are causing damage, are a public nuisance, present a public health issue, or cause safety concerns; or if the WCO is transporting live animals. A permit is not required for capture and euthanasia of Predatory Animal classified species. The permit allows the WCO to capture, possess, transport, and relocate wildlife. WCOs follow AVMA guidelines for euthanasia.

The permit is valid for two years and there are opportunities to renew or do continuing education. All field personnel must pass the WCO test. There are 80 licenses now. Live animal traps require a 48-hour trap check. A WCO can have a designee (such as a landowner or client) to check the traps on behalf of the WCO. If they are notified about an animal in the trap, the WCO must respond within 24 hours. If the target animal is a lactating female, they are required to hold the animal to lure in the neonates and use humane caging standards for that process.

WCOs report to ODFW their activities every six months. ODFW can cancel or not renew a permit if there is failure to comply, report, keep records, or meet other requirements; or if they are convicted of a wildlife violation.

Kevin shared the WCO reported trapping numbers by species from 2018, 2019, and 2020. Beavers were included in the list but averaged around 100 trapped individuals per year. He also shared the reported

beaver trapping by county for 2018, 2019, and 2020. The counties with the most trapping of beaver are the western counties because most of the human population lives there.

The Trap Check Work Group Members asked the following questions:

**Question: Are there renegade or unpermitted people doing Wildlife Control work?**

Answer: If we hear about that, ODFW will report to OSP at the local office or will work through the program side if they hear about unknown individuals or companies offering Wildlife Control services.

**Question: What kind of damage do squirrels do?**

Answer: Eastern grey squirrels are non-native and Western grey squirrels are the native species. Squirrels can cause damage to homes, attics, gardens, and sheds.

**Question: Do the WCOs report on the calls they receive, the trapping they do, or the relocations?**

Answer: Yes, and the summary tables provided include the individuals they trapped.

**Question: How is “humane” defined for WCOs?**

Answer: “humane” is not included in the definitions, but ODFW will specify conditions for humaneness when it is an important overlay, such as using a lactating female to attract neonates.

**Oregon State Police – Wildlife Division presentation**

Jamie introduced this session by inviting Sergeant Isaac Cyr to share information about OSP’s enforcement of trap checks. Given the short time notice he was given, he did not put together slides for a presentation, but was able to speak to the questions posed by the work group members.

Sergeant Cyr is stationed in Baker City and is part of the Wildlife Division which is tasked with enforcing Fish and Wildlife Laws. The division includes 120 Fish and Wildlife troopers around the state.

He responded to the following questions from the work group members sent to him ahead of time:

**How does OSP enforce trap check times and determine intent of the trapper when enforcing violations?**

OSP Wildlife Division officers conduct patrols for trapping enforcement, typically on public lands or with permission from landowners. Patrols are conducted via truck, ATVs, snow machines, aircraft, or boats. If a trapper does not meet trap check requirements, they may be given a warning or citation depending on the discretion of the Officer. Sometimes a trapper may be confused about the requirements for Predatory Animals, but there are different times for furbearers and unprotected animals since they are trapping on public lands.

**What do we know in terms of compliance with current regulations?**

Some people follow the rules, some make an honest effort and sometimes make mistakes, and some people intentionally break the law. The officers will use their training and discretion to decipher what is happening.

**How well enforced are current trapping regulations?**

Officer time on enforcement of trap checks is recorded in a time activity system. Hours, species, unit where traps were checked, and if a trapper is contacted are recorded. Often, they do not have face-to-face interactions with the trapper if everything is compliant.

#### **What are some of the challenges with enforcement?**

- Locating trap sets can be challenging, but receiving training is helpful. Stan Steele as well as ODFW staff will help to train the officers. Training will inform the officers on what to look for, methods, etc. Since trappers are not required to report where their traps are placed, officers rely on their training and knowledge of where traps have been placed in the past, where wildlife is located, and signs of trapping sets.
- Unbranded traps are challenging even though the law requires trappers to have branded traps. If a trap is unbranded, it is difficult to track down these trappers.
- Conflict with other user groups – Dog walkers, bird hunters, and others will interface with trappers on the landscape.

#### **What are common violations?**

- Unbranded traps
- Site bait within 15 feet of leg-hold traps for carnivores
- Improper jaw spacing
- Using flesh of game animals as bait
- Disturbance of lawful traps by other user groups
- Record card violations for bobcat or river otter harvest
- Trespass issues for private landowners – where trappers are placing traps on private land where they are not permitted.

#### **How many animals and non-target animals are trapped in each of the different categories?**

Enforcement does not keep track of take and defers to ODFW on that question. ODFW offers furtaker harvest reports can be gleaned from this information. From his personal experience, Sergeant Cyr has seen non-target captures of deer, raptors, wolves, cougars, and domestic pets.

Jamie invited Stan Steele to share about training of OSP Wildlife Division for trap check enforcement.

Stan Steele, who served for twenty-five years at OSP, shared about his experience training the OSP Wildlife Division. He provides instruction on best management practices, hunting and trapping regulations, how to determine types of sets and target species, and scenarios for officers to detect sets. Well trained enforcement is important for strict compliance with rules and regulations.

Stan shared a few examples of training topics:

- Finding trap brand numbers: Often traps are dyed or waxed to make them more efficient, but this process will sometimes cover up the brand numbers. With training the officers can use techniques to figure out how to find the brand on the trap.
- Site bait regulations: Site bait regulations are in place to protect avian species. However, site bait can be challenging to detect.
- Catch circles: This can indicate when a trap was set.

The group members were invited to ask questions to the guest presenters.

**Question: Has a trooper ever been caught in a trap while trying to examine it?**

Answer: These traps are not so big that a foot or hand would be caught, but training is provided to show officers how to de-activate or turn over the traps without injury. The killing devices can be more problematic, but officers are shown where the safety catch is and how to dislodge the trigger mechanism. Safety is important for the troops.

**Question: What percentage of time do officers spend monitoring trap lines? What is the percentage of violators?**

Answer: Hard numbers can be determined through statistical programs that officers use to capture officer time. From Sergeant Cyr's experience, in Eastern Oregon, the end of game season is when officers focus more time on trapping enforcement, although they enforce regulations all year. Part of training is to look for trap set locations, what to look for, and where to patrol. With training and practice, the officers know where to focus patrols. Since patrols are focused on public lands, OSP is confident they patrol these areas thoroughly. OSP was not able to provide exact statistics today but will be available for further questions in the future.

**Question: How much discretion does an officer have when issuing a citation or warning?**

Answer: Troopers have discretion in all work. Through training and experience officers learn to assess intent. When an assessment is made, officers follow what is set in statute, when it goes to court, some penalties are up to the District Attorney and how the courts assess the situation. Officers can also write a letter to the court requesting stiff fines or penalties if they find a serious violation.

**Question: For trapping coyotes on private land, the trap check times are 76 hours or 7 days, but is hard to enforce since OSP is mostly patrolling on public lands?**

Answer: Yes.

**Question: On public land, the requirements are 48 hours, but OSP mentioned that there is confusion about the trap check time intervals. Why is that?**

Answer: On public land, traps set for furbearing animals and unprotected mammals need to be checked every 48 hours. If an individual is pointing to the other trap check intervals, meant for private land, then this may be an honest mistake or an excuse. On private land, unless there is an invitation by the landowner, it would be difficult to monitor those trap checks. OSP does work with landowners who have trappers on their property and will also receive calls from concerned landowners about non-permitted trapping on their lands or trappers who are suspected of not following the rules.

Jamie thanked the guest presenters and shared that the group may reach out again with further questions in the future.

**Finalize the Draft Charter and Review Draft Work Plan**

Jamie introduced this agenda item by sharing that the Charter is close to being finalized but has a couple outstanding items for the group to discuss. One outstanding item is the scope of work for the group. Some people feel that the focus should be on "furbearers and predatory animals" and others would like to see the scope include "other mammals under ODFW authority". Jamie invited the commissioners to share their perspectives.

Commissioner Zarnowitz shared that she did not believe the scope of the work group was considering game mammal trapping when it was initially set-up because the work group was set up during the furbearer rule setting. She recommended focusing on furbearers and predatory animals only at this time, and in the future could form a group to evaluate the game mammals.

Commissioner Wolley asked how many game mammals would be added for consideration if the scope were larger. If the purpose of the group is to consider humaneness, it would make sense that the Work Group consider all animals that are caught in traps, and since bears are trapped for damage, he thinks considering treatment and humaneness for these animals is pertinent, as well.

Kevin Blakely shared that game mammals include some species where there is no trapping season such as wolves. Game mammals also include deer, elk, cougar, bear, wolves, among other species. Considering these game mammals would add complexity.

The Work Group members shared the following comments:

- Keeping the scope streamlined to furbearers and predatory animals will help the Work Group meet its timelines by the end of the year. Expanding scope to include other wildlife groupings would take more time.
- Broadening the scope to include other animal groupings outside of furbearers and predatory animals was not what the commission intended.
- If this is not the group to discuss game mammals, setting up another trap check work group would also take time and resources, while this work group is already convened.
- Wild animals are protected by ODFW and ODFW Commission and there should be consistency in the length of time they are in a trap regardless of their designation.
- There are examples of other states where there is consistency across species in trap check interval duration.
- Wildlife Services is responsible for trapping bears for timber damage, and ODFW sets the guidance on trapping bears under game management plans. ODFW may want to set protections in rule for them.
- Game mammal management is under the authority of the ODFW Commission, so it would make sense that the Commission evaluate the rules they can change, should they choose to do so.
- Legislation was introduced in the 2021 legislative session to address trap check times for bears. Even though the Commission motion was set during a Furbearer Regulations discussion, this topic is timely.
- Some trap check intervals are set by statute, and it is unclear what action the ODFW Commission could take to change those.

Jamie noted that the group will not be able to resolve the scope question in the meeting. She suggested discussing the Scope further with the ODFW Commissioners and sharing a proposal back with the group.

#### **Confirm next steps, upcoming meeting topics, and summary**

Jamie noted that the next meeting will be September 14<sup>th</sup>. There had been discussion about having the meeting in-person, but the Work Group will follow state-wide guidance on in-person meetings. Jamie suggested that the next meeting focus on two topics during this information sharing phase: 1) best management practices and 2) animal welfare. At later meetings the group can start to consider options.

The group was supportive of these topics and KW will follow-up with group members to help pull together resources to address these topics. Jamie confirmed the following action items with the group:

Action Items for 8/11

- KW: Draft meeting summary and send to group for review by Wednesday, 8/18
- KW: Coordinate with work group members to pull together the September 14<sup>th</sup> meeting agenda and resources
- KW: Follow-up with ODFWC and ODFW staff about the scope of work group (predatory, furbearer, all mammals under ODFW authority, etc.)
- APHIS: Share the trapping Best Management Practices (White et al.) with the Trap Check Work Group
- All: Send us your feedback from the 8/11 meeting via the feedback survey by 8/27

Jamie thanked everyone for their hard work and focus during the webinar.

*The meeting ended at 4:00 pm.*

Chat Log:

15:16:38 From Quinn (Quynh) Read (she/her) to Everyone:

Thanks for the presentation Kevin! Can you tell us how “humane” is defined in the rules/regs for wildlife control operators?

15:17:00 From Quinn (Quynh) Read (she/her) to Everyone:

I’ve got some background noise at home or would raise my hand and ask out loud!

15:59:55 From Bob Sallinger--Portland Audubon to Everyone:

I agree with Kelly on this. I think we should include game animals as well.

16:08:34 From Jeffrey Flores, APHIS to Everyone:

Thank you all for your time today and the privilege of allowing us to present and answer any questions for USDA WS

Appendix 1: Oregon Fish and Wildlife Commission Trap Check Working Group Questions for Wildlife Services (Working group facilitator provided the following 26 questions)

- Scope of services  
Short PPT presentation
  
  - How many APHIS (Wildlife Services) staff trap for damage complaints in Oregon? Where are they located across the state?  
We have approximately 36 field employees, scattered throughout the state. They report to 3 district field offices (Salem, Roseburg, and La Grande), and the state office in Portland. We operate in an average of 24 counties routinely (NW= Washington, Clackamas, Marion, Linn, Benton, Polk, and Lincoln; SW= Lane, Douglas, Coos, Curry, Jackson, and Klamath; East= Wallowa, Union, Baker, Malheur, Grant, Harney, Umatilla, Morrow, Gilliam, Wheeler, and Deschutes counties), and the remaining counties as requested.
  
  - Do they keep track of the numbers of animals that they trap, including species, locations, landownership (private, BLM, USFS, state, other), types of damage, and any other data? Can you share about Wildlife Services recordkeeping work related to trapping that they do?
    - Yes  
WS Directive 4.205, Data and Activity Reporting, [4.205.pdf \(usda.gov\)](#)
  
  - When a complaint comes in, how quickly do they respond to it? Does this depend on the type of animal involved?  
The goal is timely response, to return contact within 24 – 48 hours;  
Prioritization based upon damage type, location, amount of damage occurring, current workload, and determining the level of human safety risk.  
WS Directive 1.201, Mission and Philosophy of the WS Program, [1.201.pdf \(usda.gov\)](#)  
WS Directive 2.101, Selecting Wildlife Damage Management Methods, [2 \(usda.gov\)](#)  
WS Directive 2.201, WS Decision Model, [2.201.pdf \(usda.gov\)](#)
  
  - How frequently do they check traps?  
What are trap check time intervals for black bears trapped for timber damage?  
WS Directive 1.210, Legal Authority, [Microsoft Word - 1210.doc \(usda.gov\)](#)  
WS Directive 2.105, The WS Integrated Wildlife Damage Management Program, [Microsoft Word - 2105.doc \(usda.gov\)](#)  
WS Directive 2.210, Compliance with Federal, State, and Local Laws and Regulations, [2.210.pdf \(usda.gov\)](#)  
WS Directive 2.450, Traps and Trapping Devices, [2.450.pdf \(usda.gov\)](#)
- State requirements:
- Predatory animal: traps must be checked within 76 hours, 7 days, 30 days, depending on the damage type
  - Unprotected mammals, traps checked within 48 hours
  - Furbearer: traps checked within 48 hours
  - Bears & Cougars – IGA with ODFW specifies within 48 hours
  - Wolves – IGA specifies within 24 hours

- What types of traps are used for which species? Please provide photos of the traps. How often are you using kill traps or live traps for predatory animal control?

(With a short turn around in receiving the questions, I didn't have time to gather photos of traps, however, trap designs and manufactures identified in the most recent literature pertaining to BMPs depict the types and modifications of the traps used by WS.)

White et al. 2020, [Best Management Practices for Trapping Furbearers in the United States - White - 2021 - Wildlife Monographs - Wiley Online Library](#)

WS Directive 2.450, Traps and Trapping Devices, [2.450.pdf \(usda.gov\)](#)

For all WS methods used when any form of "take" was reported (hazing, freed, killed, etc.) for FY16-FY20, trapping methods accounted for less than 1% of all methods used.

When trapping methods are deployed, cage traps account for an average of 24% of the trap types used, killing traps 37%, live/ restraining traps 39%.

- Do they teach landowners to avoid the damage issues? Yes  
Do you currently prioritize non-lethal methods like exclusion, one-way doors, chimney caps, better attractant storage and better property housekeeping as coexistence methods? Yes  
Have you ever refused to provide animal removal services to a client that clearly was unwilling to take the steps to remove attractants or harborage conditions for the species they wanted controlled? Yes

YES

WS Directive 1.201, Mission and Philosophy of the WS Program, [1.201.pdf \(usda.gov\)](#)

WS Directive 2.101, Selecting Wildlife Damage Management Methods, [2 \(usda.gov\)](#)

WS Directive 2.105, The WS Integrated Wildlife Damage Management Program, [Microsoft Word - 2105.doc \(usda.gov\)](#)

WS Directive 2.110, WS Research and Methods Development, [Microsoft Word - 2110 7-21-08 e-signature.doc \(usda.gov\)](#)

WS Directive 2.115, National Wildlife Research Center

WS Directive 2.201, WS Decision Model, [2.201.pdf \(usda.gov\)](#)

WS implements an integrated wildlife damage management program, providing recommendation to landowners on what they can implement themselves, providing guidance on how to improve methods they are already implementing, providing demonstration or training on what methods to use and how best to use them, and or implementing integrated methods directly for the resource owner.

During FY 2016 – FY 2020, WS-Oregon reported providing an annual average of 1,068 technical assistance to resource owners. Also, in those technical assistance actions, WS reported recommending over 2,162 integrated method recommendation to resources owners in addition to the methods already being deployed by resource owners.

- Are they able to use licensed trappers to handle some of the complaints? Do they use contractors to handle the complaints?

Wildlife Services does not have regulatory authority. ODFW has legal authority to license and regulate trapping in Oregon, and WS does not overlap with state wildlife management authority. Wildlife Services does not subcontract services.

WS Directive 1.210, Legal Authority, [Microsoft Word - 1210.doc \(usda.gov\)](#)

- Do your trappers follow the AVMA euthanasia guidelines for each species?

WS Directive 2.505, Lethal Control of Animals, [United States Department of Agriculture \(usda.gov\)](https://www.usda.gov)

WS-Oregon follows AVMA recommended euthanasia procedures when feasible to minimize pain and suffering. AVMA (2020) notes, "...it may still be an act of euthanasia to kill an animal in a manner that is not perfectly humane or that would not be considered appropriate in other contexts. For example, due to lack of control over free-ranging wildlife and the stress associated with close human contact, use of a firearm may be the most appropriate means of euthanasia. Also, shooting a suffering animal that is in extremis, instead of catching and transporting it to a clinic to euthanize it using a method normally considered to be appropriate (e.g., barbiturates), is consistent with one interpretation of a good death. The former method promotes the animal's overall interests by ending its misery quickly, even though the latter technique may be considered to be more acceptable under normal conditions." As described by the AVMA, there may be a distinction between clinical euthanasia and field practices for humane killing, but field practices are still considered an acceptable form of euthanasia. APHIS-WS policy and operating procedures fully comply with these guidelines, and APHIS-WS recognizes the importance of careful decision making in the field regarding all use of lethal methods.

- Do you agree that most wildlife injuries like paw rub, face rub, chipped teeth, cut gums, and damage from loss of circulation are directly proportional to the length of time the animal is left in the trapping device?

We do not agree that time in trap correlates directly to injuries based on the available data and peer-reviewed literature. From (White et al 2020), "It may also be tempting to assume that average injury scores are positively correlated with the time spent in a trap, but data are extremely limited. Based on observed restraint behavior described above, injury occurrence might be most likely in the first hours after capture, and again when humans approach to dispatch or release the animal (which would occur regardless of trap-check interval), although it may not be appropriate to assume animal movement is required to cause trap-related injury."

The authors go on to state the following:

"Furthermore, trap-check interval does not equate with time spent in a trap; with a 48-hour trap check requirement, a captured animal could still have been in a trap for only 6 hours prior to trap inspection."

White et al. 2020, [Best Management Practices for Trapping Furbearers in the United States - White - 2021 - Wildlife Monographs - Wiley Online Library](#)

- Do you currently record the length of time you think the animal has been in the trapping device?  
No

- Do you have animal welfare focused policies like not trapping in temperature extremes or requiring "worry toys" inside livetraps to give the occupants a safe alternative to chewing on the metal trap? Do you have a policy of not having any metal baits (like cat food cans) inside the trap?

WS goal is to address the concerns of damage by following WS's Decision Model. Included in this decision matrix is considering how to address the damage, including determining the ideal locations of setting traps. WS employees are trained to consider animal welfare when setting traps, and this includes trap placement, availability of food and water, cover, as well as the

security of the trap to prevent the trapped animal being susceptible to predation or human disturbance. WS has not assessed the negative or positive impacts that worry toys would have in trap capture rates or potential reduction of injuries. We don't currently have any policy on metal baits; however, WS is willing to explore alternatives to this type of bait delivery system. WS Directive 2.101, Selecting Wildlife Damage Management Methods, [2 \(usda.gov\)](#)  
WS Directive 2.105, The WS Integrated Wildlife Damage Management Program, [Microsoft Word - 2105.doc \(usda.gov\)](#)  
WS Directive 2.201, WS Decision Model, [2.201.pdf \(usda.gov\)](#)  
WS Directive 2.450, Traps and Trapping Devices, [2.450.pdf \(usda.gov\)](#)  
WS Directive 2.505, Lethal Control of Animals, [United States Department of Agriculture \(usda.gov\)](#)

- What are your protocols for finding live animals in kill traps?  
Animals targeted for lethal removal would be dispatched immediately, removed from capture devices, and properly disposed.  
WS Directive 2.450, Traps and Trapping Devices, [2.450.pdf \(usda.gov\)](#)  
WS Directive 2.505, Lethal Control of Animals, [United States Department of Agriculture \(usda.gov\)](#)  
WS Directive 2.510, Fur, Other Animal Parts, and Edible Meat, [2.510.pdf \(usda.gov\)](#)  
WS Directive 2.515, Disposal of Wildlife Carcasses  
[https://www.aphis.usda.gov/wildlife\\_damage/directives/pdf/2.515.pdf](https://www.aphis.usda.gov/wildlife_damage/directives/pdf/2.515.pdf)
- How do you handle non-target wildlife caught in traps? Do most survive and do you record that?  
Non-target animals captured, when legal to do so, and when possible (safety and health of the employee, and of the animal) are released.  
For FY2016-2020, for all trapping methods, the average annual non-target capture was an average of 2% of all captures, approximately 72 individual animals per year. Non-target lethal take was less than 1% of all captures (36 individual animals) trapping equipment.  
WS Directive 2.450, Traps and Trapping Devices, [2.450.pdf \(usda.gov\)](#)  
WS Directive 2.505, Lethal Control of Animals, [United States Department of Agriculture \(usda.gov\)](#)
- Challenges you face with different intervals across terrain, species, settings (urban/rural)?  
Individual animals respond differently to novel stimuli or disturbances and are likely to also respond differently in different environmental conditions. Selecting for specific and individual animals can be challenging given their unique behavioral responses. A coyote in an urban area is likely to be more tolerant of human disturbance and novel stimuli whereas a coyote in a rural area is less tolerant to human disturbance.  
It is possible to set a trap for a coyote and capture the coyote in the first night of a trap being set. However, studies have shown that coyotes are reluctant to approach a trap site (ground disturbance) and make several attempts of increasing proximity to trap sites before being caught. Reported recreational coyote trapping data, (Personal Communication, Derek Broman 2021) identified that catch per unit effort was 1.3 coyotes for every 100 trap nights. It took approximately 77 nights of effort (multiple traps set) to catch 1 coyote.

Urban environments or areas with increased human traffic may increase the risk of pets being exposed to traps or people coming into contact with animals in traps, which increases the need for more frequent trap checks.

WS is trapping in response to damage and is targeting specific individuals or localized groups of individuals using the appropriate Best Management Practices in response to conflicts. We are not running recreational trap lines in small geographic areas. With a limited number of employees statewide, and the possibility of conflicts occurring anywhere, staff cover large geographic areas. Properties, and damage can occur in very remote areas far away from developed roads and or miles behind gates. Travel time getting into remote sites and locations must be taken into account to allow for sufficient time in checking equipment. Coupled with variables in animal behavior, traps need to have sufficient time for specific animals to have time to be in the area of the trap, and to work past novel stimuli to catch themselves in the trap.

- Opportunities to do things differently

The question was not very clear in what it was asking. WS works closely with its research arm of Wildlife Services, the National Wildlife Research Center (NWRC) and partner with other entities in conducting research. As technology and research become available, WS is prepared to utilize these in our IWDM activities.

- What work is wildlife services doing around beaver monitoring, both population generally and harvest?

ODFW has management authority for wildlife in the state. Dr. Jimmy Taylor with the NWRC (WS) is our subject matter expert on beaver. He has conducted beaver research in the Pacific Northwest, the arid Southwest, the Atlantic states, and the Southeast and has published 20 or more scientific articles on beaver. In the 15 years that Dr. Taylor has been a Field Station Leader and Project Leader with NWRC. WS and NWRC can assist the state with research on beaver and or estimate beaver population size in Oregon.

- What is the primary reason that wildlife services gets called regarding beavers (i.e. flooding impacts, blocked culverts, etc)

WS-Oregon is requested to assist with beaver damage management. The main reason it did so was for the protection of human health and safety. Beaver activities that result in flooding of roads, structures, homes, property, and/or utilities present significant, and immediate threats to human health and safety because flooding may cause motor vehicle accidents, cause power outages, isolate individuals from ingress or egress from their homes, and impact access to emergency and other essential services. On average, 70% of the conflicts WS-Oregon has responded to is for damage or threats to structures, which affect human health and safety.

**Habitat Questions:**

- Is wildlife services undertaking any projects to evaluate the habitat requirements for beavers?

Specifically, at this time, no.

The general habitat requirements for beaver are well known. They are central-place foragers that require water, access to food, and escape cover. They have a wide foraging niche and consume a variety of woody and herbaceous plants. In many places within Oregon beaver thrive without building dams. They live in bank dens to rest and raise their young instead of living in

traditional constructed lodges, thus they are largely unnoticed by the public. One of Dr. Jimmy Taylor's current graduate students is developing models to beaver occupancy and beaver dam occurrence in southwest Oregon. He's also investigating the potential effects of climate change on beaver habitat use and how beaver dams affect stream temperatures and dissolved oxygen. Dr. Taylor and colleagues also have proposed a largescale study in western Oregon to better understand beaver survival and habitat use in a largely forested landscape that is modified by timber harvest and wildfire. If funded this study will be the first of its kind in Oregon.

- Does wildlife services have any data on whether available habitat or trapping is a limiting factor for beaver habitat in the state?

Along with coauthors from Oregon State University, Dr. Jimmy Taylor from the NWRC recently published the results of a largescale study in the Oregon Coast Range which concluded that beaver dispersal is not limited by landscape features and occurs most commonly within watersheds, but also among adjacent watersheds in the Oregon Coast Range. They also concluded that natural recolonization of empty habitat likely does not require translocation if beaver are present within the major tributary (fifth level) watershed, or in adjacent major tributary watersheds. The potential for recolonization through dispersal is still possible, albeit at lower probability, even if beaver are only present within the sub-basin (fourth level) watershed. There is no data or evidence that we are aware of to suggest that beaver are limited by any factor in Oregon. However, our research scientists with the NWRC would be very interested in addressing this in a research study if stakeholders identify this as an important research need and provide research funding.

- To what extent does trapping permanently solve the problem? Is it agreeable that not addressing attractants will simply perpetuate the problem? If so, what actions do you take to address the attractants?

We respectfully submit that it is unrealistic to think that any single management action would solve a problem forever when the environment and the species within it are dynamic. Trapping can be very effective in reducing human-wildlife conflict. It can also be effective in combination with non-lethal practices in an adaptive framework to reduce damage. Although trapping may remove a small number of individuals from a population, research has shown it can increase reproductive rates in the population. It can also create unoccupied space that is occupied by dispersing individuals. These density-dependent effects are often considered by Wildlife Services in choosing the appropriate techniques to reduce human-wildlife conflicts.

We also do not understand what you mean by "attractants". If referring to beaver, beaver require water, access to forage, and cover to escape predators and raise their young. We are not aware of beaver being attracted to anything other than the conditions that allow them to survive.