

Exhibit C

**Supplemental
Public Correspondence Received as of
June 23, 2026**

BORISCH Roxann B * ODFW

From: Gina J <grealimagepro@gmail.com>
Sent: Tuesday, June 23, 2026 11:56 AM
To: ODFW Commission * ODFW
Subject: Bill HB3932

You don't often get email from grealimagepro@gmail.com. [Learn why this is important](#)

To Whom it may concern

I am expressing my opposition to Bill HB3932 in stopping Beaver and possibly Otter trapping.

There is a law that protected beaver so they could repopulate. It was based on the beaver in specific areas and was Not a political decision that would be closing off approximately 80% of Oregon. There is **no scientific basis** supporting a need for this action. In fact, **ODFW has stated themselves: "Trapping has no impact on beaver populations in Oregon."**

I highly recommend that this bill be stopped for the good of Oregon land.

Gina Janelli
Klamath Falls, Or. 97603

June 22, 2026

Dear Fish and Wildlife Commissioners:

We are already in a year of unprecedented drought. With climate change, models show longer, drier summer and falls are likely to more frequently occur.

It's hard not to despair, as water for human communities and fish and wildlife becomes scarcer and the drier landscape more prone to catastrophic wildfires.

We have very few tools in our tool box right now, and you Commissioners hold one of them: changing beaver hunting and trapping regulations to help beaver populations grow throughout Oregon on federal and state public lands. We need as many beavers as possible throughout all our floodplain landscapes to build their dams which in turn creates wetter riparian areas, wetlands, and deeper pools and channels. These beaver-influenced areas are havens for fish and wildlife, wetted refuge areas during fires, and help the landscape store more water, which is key to providing drinking water to our communities (see attachment for how much drinking water comes from surface flow off public land).

While ODFW and the legislature have been making strides in beaver research, outreach, and closures, these actions are insufficient to address today's drought crisis and address the drought and wildfire crises that will continue to plague us.

The existing public land closures (due to the 2025 Oregon House Bill 3932) are not adequate to rebuild beaver populations to their full potential. The closure doesn't even apply to some of the driest areas of the state where water quality testing hasn't been done and ignores the need to protect and enhance water on the landscape even in areas where water quality is ok.

The Beaver Management Working Group's recommendations (May 2022, relevant excerpts attached) to the ODFW Commission did NOT tie beaver harvest curtailment to water quality limited areas, but rather suggested that beaver harvest be closed in areas where "beavers are either effectively managing floodplains and their gains need to be supported, or where beaver are not adequately managing floodplains, and their recovery and improvement need to be supported". They suggested allowing beaver harvest "only where beaver density is high". (Emphasis added).

Related to this, the Working Group noted "Scientists and wildlife managers do not have a comprehensive understanding of the beaver population in Oregon nor is there an agreed-upon method to model beaver populations". They also said that the lack of information was not an excuse for inaction: "the report does not propose "doing nothing", or making no changes to current beaver management, while waiting for additional data to be collected.

“The BMWG has identified critical objectives to improve the management of beaver and beaver habitat as quickly as possible” within the existing regulatory frameworks, to “Maximize beaver modified floodplain landscapes and ecosystem benefits on federally managed public lands.”

We can only maximize these floodplain benefits if beaver populations are rebuilt broadly and to do this, all hunting and trapping on all public lands need to be curtailed for a period of time to allow populations to expand. While beaver populations can expand if not subject to human predation, these closures must be sufficient in length to allow populations to grow, so that over time the younger beavers can leave their colonies and establish new territories. Hunting and trapping of beaver takes place during their breeding and pupping season hindering population growth. Additionally, unlike pressure from cougar and bear predation, hunting and trapping may remove entire colonies, hindering population expansion.

Accordingly, I ask you to amend the suggested motion in front of you as shown in red below:

Ammended MOTION: I move to approve staff proposals as shown in Attachment 3 and amend Oregon Administrative Rule Chapter 635, Division 050 as proposed by staff and shown in Attachment 4, to set regulations and seasons for the harvest and pursuit of furbearing mammals, except that Section 635-50-0070 would be modified to read as follows:

“All public lands and the waters that reside on them, flow through them, or have one side bounded by public lands and not currently closed under HB 3932, are hereby closed. All existing ODFW closures are hereby incorporated into this closure.”

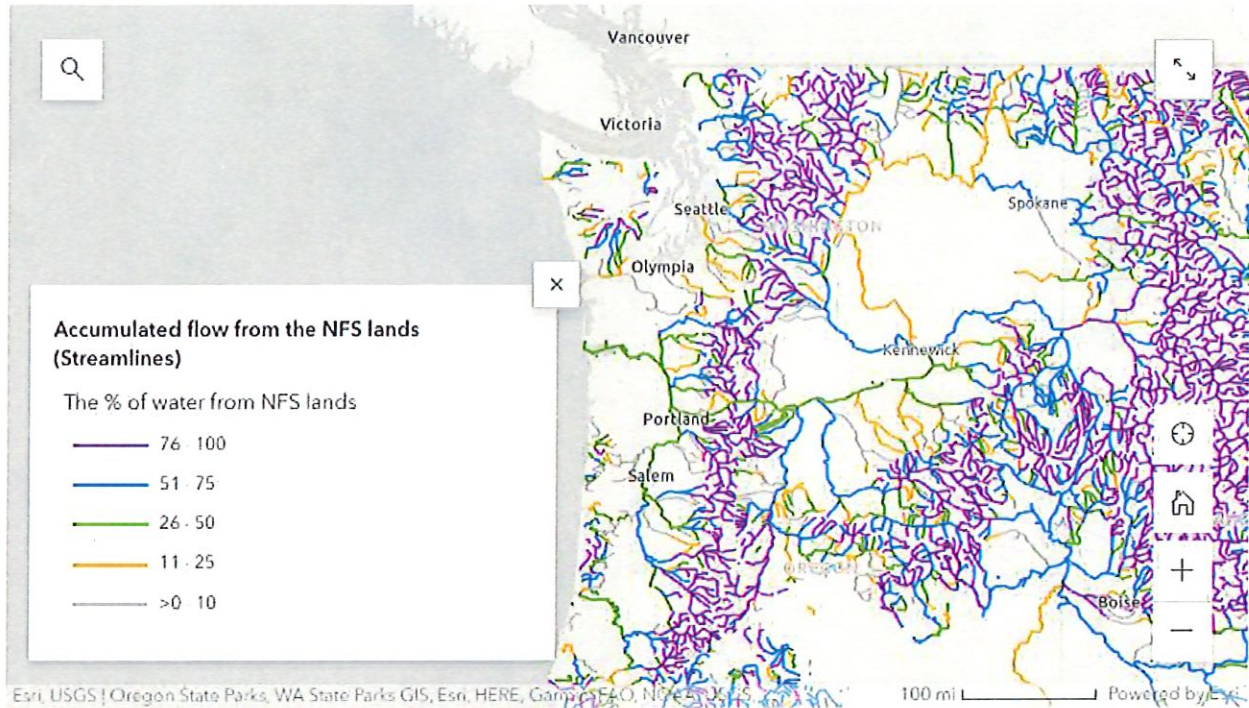
Thank you for your attention.

Sincerely,

Fran Recht
PO Box 221
Depoe Bay, OR 97341

Surface Water Supply that originates on USFS Lands¹

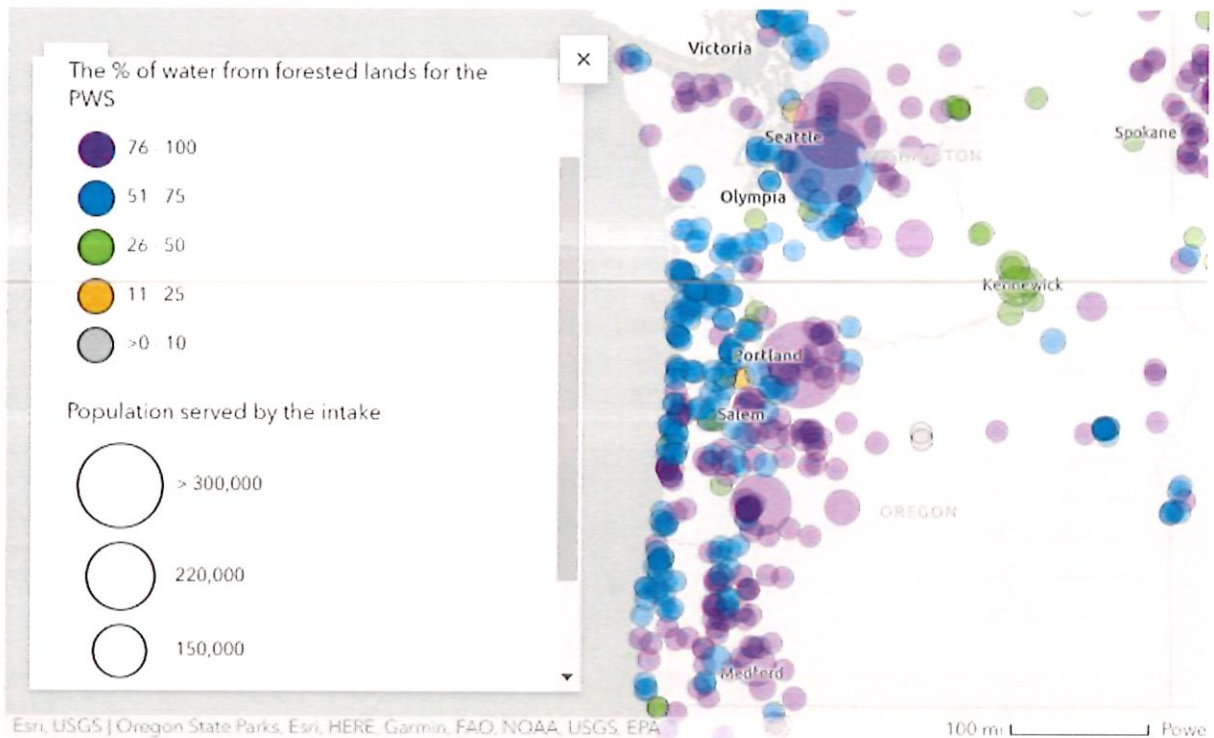
(Percent of mean annual surface water supply from USFS lands)



Percentage of the total 2001–2015 mean annual surface water supply that originated on National Forest System lands by sub-watershed streamline. Surface water supply is the total amount of surface water available at the outlet of each sub-watershed, including flow accumulated from sub-watersheds upstream after accounting for inter-basin transfers. Streamlines are colored according to the fraction of total water supply at the watershed outlet that originated on National Forest System lands.

¹ From story map: <https://storymaps.arcgis.com/stories/28f7829baf494a6e9bd8d76e9aeeaa50>
Based on this publication: Liu, Ning; Dobbs, G. Rebecca; Caldwell, Peter V.; Miniati, Chelcy F.; Sun, Ge; Duan, Kai; Nelson, Stacy A.C.; Bolstad, Paul V.; Carlson, Christopher P. 2022. Quantifying the role of National Forest System and other forested lands in providing surface drinking water supply for the conterminous United States. Gen. Tech. Rep. WO-100. Washington, DC: U.S. Department of Agriculture, Forest Service, Washington Office. 40 p. plus supplement . <https://doi.org/10.2737/WO-GTR-100>

Drinking Water provided by USFS, other forested lands (Percent of water from forested lands for public water supplies)



Public surface drinking water intakes where some amount of source water originated on National Forest System and other forested lands. Circles representing intakes are colored by the percentage of surface drinking water from National Forest System and other forested lands after accounting for inter-basin transfers and sized by the population served. Intake locations are approximate.

EXCERPTS FROM BEAVER MANAGEMENT WORK GROUP (BMWG) REPORT TO ODFW COMMISSION

Background:

BMWG was a result of ODFW Commission direction in November of 2020 to consider beaver management in the context of climate change, habitat benefits to fish and other species, and water flow, retention and temperature. This diverse 19-member group met monthly for almost a year (June 2021 to April 2022) with the stated mission to make recommendations to the Commission "regarding ODFW policies, practices, and programs relating to beaver management on federally managed public lands in Oregon."

Those recommendations are put forth in a 26 page report published in May 2022 called "Recommendations for Beaver Management on Federal Land from the Oregon Fish and Wildlife Commission Beaver Management Work Group to the Oregon Fish and Wildlife Commission".

EXCERPTS:

The report documented the value of beavers in floodplain modified habitats (page 5):

"The BMWG recognized that supporting habitat for beavers and increasing beaver populations on federally managed public lands can be beneficial to humans and other wildlife through improved ecosystem services, increased economic benefits, increased climate resilience, and enhanced biodiversity conservation benefits." The group produced a value statement to that effect: "We recognize that beaver inhabited floodplains can have positive benefits for the people, fish, and wildlife of Oregon." Details of these benefits are found on pages 6 and 7 of the report.

The report also noted the fact (page 9) that ODFW does not have adequate beaver population information (underlines added for emphasis) : "Scientists and wildlife managers do not have a comprehensive understanding of the beaver population in Oregon nor is there an agreed-upon method to model beaver populations" and that ODFW needs to work collaboratively with researchers and federal partners to know where key beaver habitat on federally managed public land is.

The BMWG did not focus solely on trapping and hunting to address goals and talked about information needs, but explicitly said that "the report does not propose "doing nothing", or making no changes to current beaver management, while waiting for additional data to be collected." "The BMWG has identified critical objectives to improve the management of beaver and beaver habitat as quickly as possible" within the existing regulatory frameworks, to "Maximize beaver modified floodplain landscapes and ecosystem benefits on federally managed public lands."(emphasis added, page 11).

The report also recognized that ODFW has "sufficient justification to take immediate and direct actions to maximize beaver modified floodplain landscapes in priority areas on federally managed public lands and to be a leader in ensuring that collaborative, concurrent monitoring is undertaken to understand the impacts of these management actions." (p.13 emphasis added).

The BMWG identified closures on hunting and trapping as one of the appropriate Management Approach (see excerpts below from pages 13 and 14 of the report; emphasis added) to maximize beaver modified floodplain landscapes.

Management Approaches

The BMWG recognizes that ODFW has sufficient justification to take immediate and direct actions to maximize beaver modified floodplain landscapes in priority areas on federally managed public lands and to be the leader in ensuring that collaborative, concurrent monitoring is undertaken to understand the impacts of these management actions.

Management decisions to help achieve the objectives could include:

- Assess modifications to the hunting and trapping regulations to meet objectives within priority areas including:
 - Changing the method, magnitude, location, and season of take.
 - Setting bag limits and/or allowing for take only where beaver density is high.
 - Closing areas to harvest where beavers are being translocated onto federal land, where habitat restoration action is occurring and where beaver are either effectively managing floodplains and their gains need to be supported, or where beaver are not adequately managing floodplains, and their recovery and improvement need to be supported.
 - Identifying the specific geographic area and duration of closures.

BORISCH Roxann B * ODFW

From: ODFW Commission * ODFW
Sent: Tuesday, June 23, 2026 8:11 AM
To: ODFW WildlifelInfo * ODFW
Cc: BORISCH Roxann B * ODFW
Subject: FW: Written Comments related to Exhibit C: Furbearer Regulations
Attachments: 1_Request to Expand OAR 635-050-0070_Fouty.pdf; 3_Setting the Record Straight on Closures and Habitat.pdf; 2_HB 3932 limitations.pdf

From: Suzanne Fouty <suzannefouty2004@gmail.com>
Sent: Tuesday, June 23, 2026 12:52 AM
To: ODFW Commission * ODFW <ODFW.Commission@odfw.oregon.gov>
Cc: Suzanne Fouty <suzannefouty2004@gmail.com>
Subject: Written Comments related to Exhibit C: Furbearer Regulations

You don't often get email from suzannefouty2004@gmail.com. [Learn why this is important](#)

Please accept these three attached documents as my written testimony related Exhibit C.

1. My request to expand OAR 635-050-0070 to include all public lands and waters that reside on or flow through public lands and reasoning.
2. A PowerPoint in pdf form: HB 3932 limitations. Provides a detailed examination of HB 3932 and why the closure on public lands need to be expanded.
3. A PowerPoint in pdf form: Setting the Record Straight on Closures and Habitat Availability. Provides information on the published literature related to closures and habitat availability. It corrects misinterpretations or perspectives that cannot be done in a 3 minute testimony.

Thank you.

Suzanne Fouty, PhD
Hydrologist/Soils Specialist
retired USDA Forest Service



**HB 3932 NEW CLOSURES INSUFFICIENT TO
PROVIDE OREGON WITH BEAVER BENEFITS:
FULL PUBLIC LANDS AND WATERS CLOSURE
NEEDED**

Dr. Suzanne Fouty
Hydrologist
retired USDA Forest Service

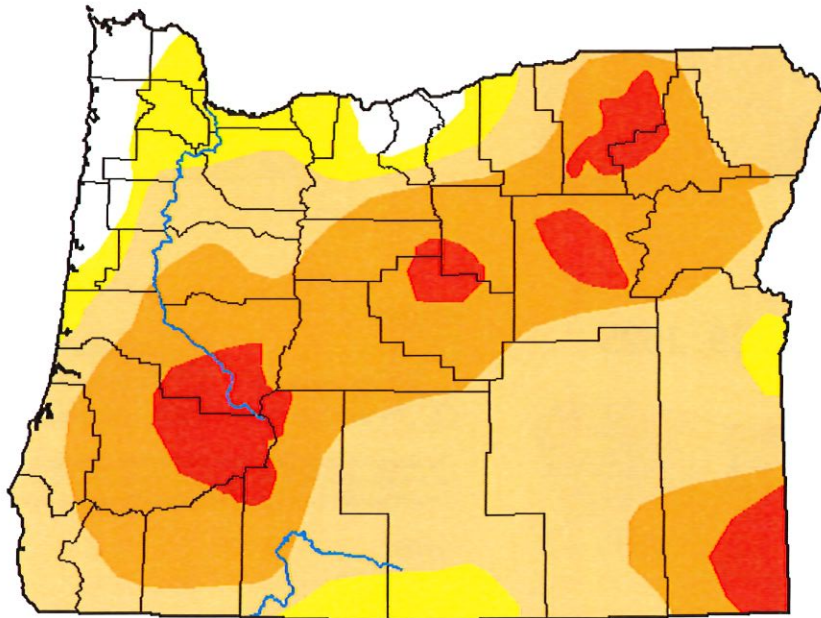
OCT 29 2007

OUTLINE

1. **Scale of crises facing Oregon's human and wild communities**
2. HB 3932
 - Closure areas related to HB 3932 and existing ODFW closures
 - Reasons stated for HB 3932
 - Flawed assumptions and summary of HB 3932 limitations
 - Closure criteria
 - Implementation requirements
 - Issues
3. Benefits of full public lands and waters closure
4. Recommended language change and who decides
5. Conclusions

U.S. Drought Monitor Oregon

June 16, 2026
(Released Thursday, Jun. 18, 2026)
Valid 8 a.m. EDT



Drought Conditions (Percent Area)

	None	D0-D4	D1-D4	D2-D4	D3-D4	D4
Current	4.21	95.79	86.19	44.16	9.24	0.00
Last Week 06-09-2026	4.21	95.79	84.10	44.16	9.24	0.00
3 Months Ago 03-17-2026	22.14	77.86	41.16	6.20	0.00	0.00
Start of Calendar Year 01-06-2026	65.06	34.94	15.76	4.65	0.00	0.00
Start of Water Year 09-30-2025	32.92	67.08	47.65	24.35	1.39	0.00
One Year Ago 06-17-2025	34.61	65.39	35.77	3.62	0.00	0.00

Intensity:

- None
- D0 Abnormally Dry
- D1 Moderate Drought
- D2 Severe Drought
- D3 Extreme Drought
- D4 Exceptional Drought

The Drought Monitor focuses on broad-scale conditions. Local conditions may vary. For more information on the Drought Monitor, go to <https://droughtmonitor.unl.edu/About.aspx>

Author:

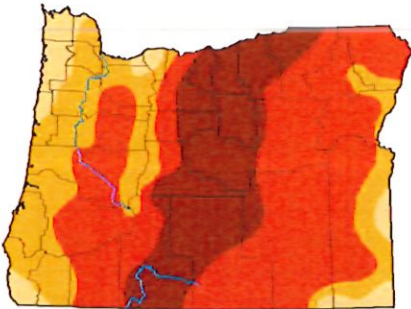
Brian Fuchs
National Drought Mitigation Center



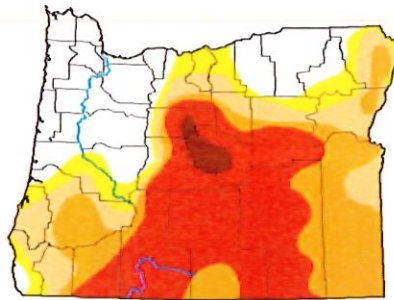
droughtmonitor.unl.edu

MULTI-YEAR DROUGHTS AND WATER SCARCITY

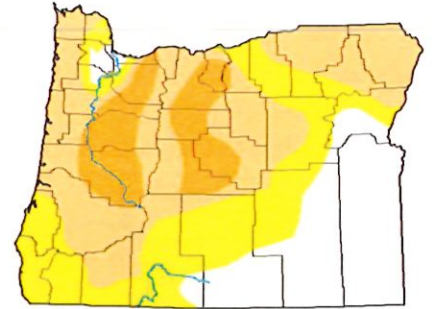
July 27, 2021



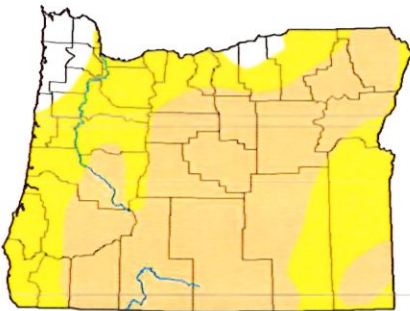
July 26, 2022



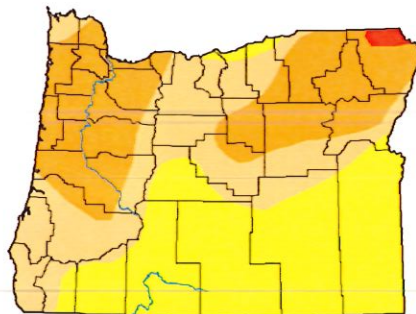
July 25, 2023



July 30, 2024



July 29, 2025



Intensity:

- | | |
|---------------------|------------------------|
| None | D2 Severe Drought |
| D0 Abnormally Dry | D3 Extreme Drought |
| D1 Moderate Drought | D4 Exceptional Drought |

The Drought Monitor focuses on broad-scale conditions. Local conditions may vary. For more information on the Drought Monitor, go to <https://droughtmonitor.unl.edu/About.aspx>

Author:

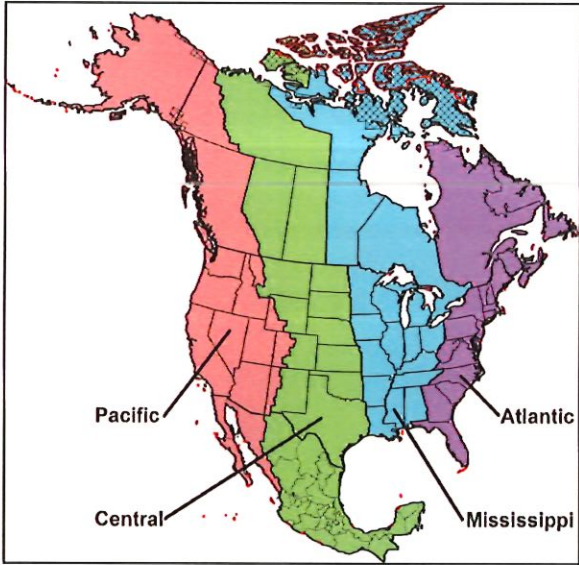
Richard Heim
NCEI/NOAA



SOURCE: <https://droughtmonitor.unl.edu/Maps/MapArchive.aspx>

droughtmonitor.unl.edu

THE FLYWAYS



LARGE BIRD DIE OFFS DUE TO DEGRADED AND DECLINING HABITAT

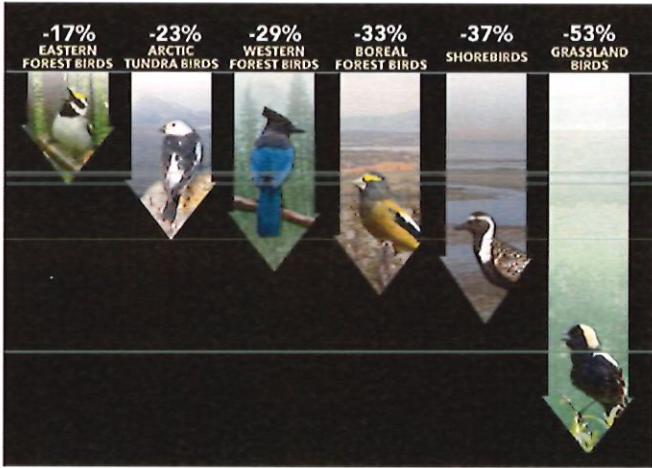
OREGONLIVE
The Oregonian

ENVIRONMENT

Tens of thousands of birds die at wildlife refuges in southern Oregon, the largest die-off to date

Updated: Sep. 27, 2024, 2:23 p.m. | Published: Sep. 27, 2024, 1:20 p.m.

A close-up photograph of a bird, likely a grebe, sitting on a nest. The nest is constructed from dry grass and twigs. The bird has dark feathers and a long, pointed beak. It is looking towards the left of the frame.



Graphic by Jillian Dimer. Photo credits appear at the end of this article.

LANDSCAPES ON FIRE AND LIVES TRANSFORMED

The West Is on Fire. It's Past Time to Act on Climate Change.

Aug. 3, 2021

By Kate Brown

Ms. Brown, a Democrat, is the governor of Oregon.

SALEM, Ore. — If you are on the East Coast, the sunrises you saw last week were probably tinged with a bit of red. That haze was the smoke from the fires scorching the West, including the 400,000-acre-plus Bootleg Fire in southern Oregon, the largest in the country at the moment and the latest in a string of climate-related natural disasters to befall my state.

We are no strangers to forest fires in the West. About half of Oregon, some 30 million acres, is forestland. But in the past decade, as our summers have grown longer, hotter and drier, our lush forests have turned into tinderboxes. I have declared drought emergencies in 22 of our 36 counties already this year, as rivers and reservoirs run low because of insufficient snowpack and the lack of rainfall. Last summer, Oregon experienced its most devastating fire season in many years, when [more than 2,000 fires](#) burned 1.2 million acres. We [lost](#) at



Credit: U.S. Forest Service

lost at

As wildfires grow, poor, elderly disproportionately affected

By LYNNIE TERRY Oregon Capital Chronicle 23 hrs ago



Highway 22 East of Seem was shut down in both directions at mile post 93 for search and rescue efforts in the Siskiyou Canyon area on Wednesday, Sept. 8, 2021.

Source: County Sheriff's Office

Oregon Capital Insider 10/5/2023

The New York Times

How Megafires Are Remaking the World

In our Pyrenean age, enormous wildfires aren't merely damaging ecosystems but transforming them.



Credit: Joe Whelan

NATIVE FISHERIES STRUGGLING AND ON EDGE OF EXTINCTION DUE TO DEGRADED HABITAT

**The Klamath River Fish Kill of 2002;
Analysis of Contributing Factors**



Yurok Tribal Fisheries Program

February 2004

Final Report

Prepared by:
Michael Belchik
Dave Hillenmeier
Kamille M. Pierce

PCFFA-155, Page 1

**Petition to List the Oregon Coast,
Southern Oregon and Northern
California Coastal ESUs of Chinook
Salmon (*Oncorhynchus tshawytscha*)
under the Endangered Species Act**



Native Fish Society
Center for Biological Diversity
Umpqua Watersheds

August 4, 2022

Biologists blame warm water for salmon deaths

■ State restricts fishing on many streams to protect native fish

By Jayson Jacoby
jjacob@oregonlive.com

State biologists say unusually warm water killed about 120 wild chinook salmon earlier this month on the Middle Fork of the John Day River about 60 miles southwest of Baker City.

This is the third summer in the past decade in which water temperatures in the Middle Fork rose to the mid-70s, fatally high for some salmon, said Brent Smith, a biologist at the Oregon Department of Fish and Wildlife's John Day office. Biologists also blame warm water for

chinook die-offs along the Middle Fork in 2007 and 2013, Smith said.

Cooler temperatures and heavy rain the past week have at least temporarily eased the threat to the salmon, he said.

See Fish/ Page 8A

July 2007

Summer 2015

Heat likely killed 100 Chinook

Carcasses turn up in John Day area

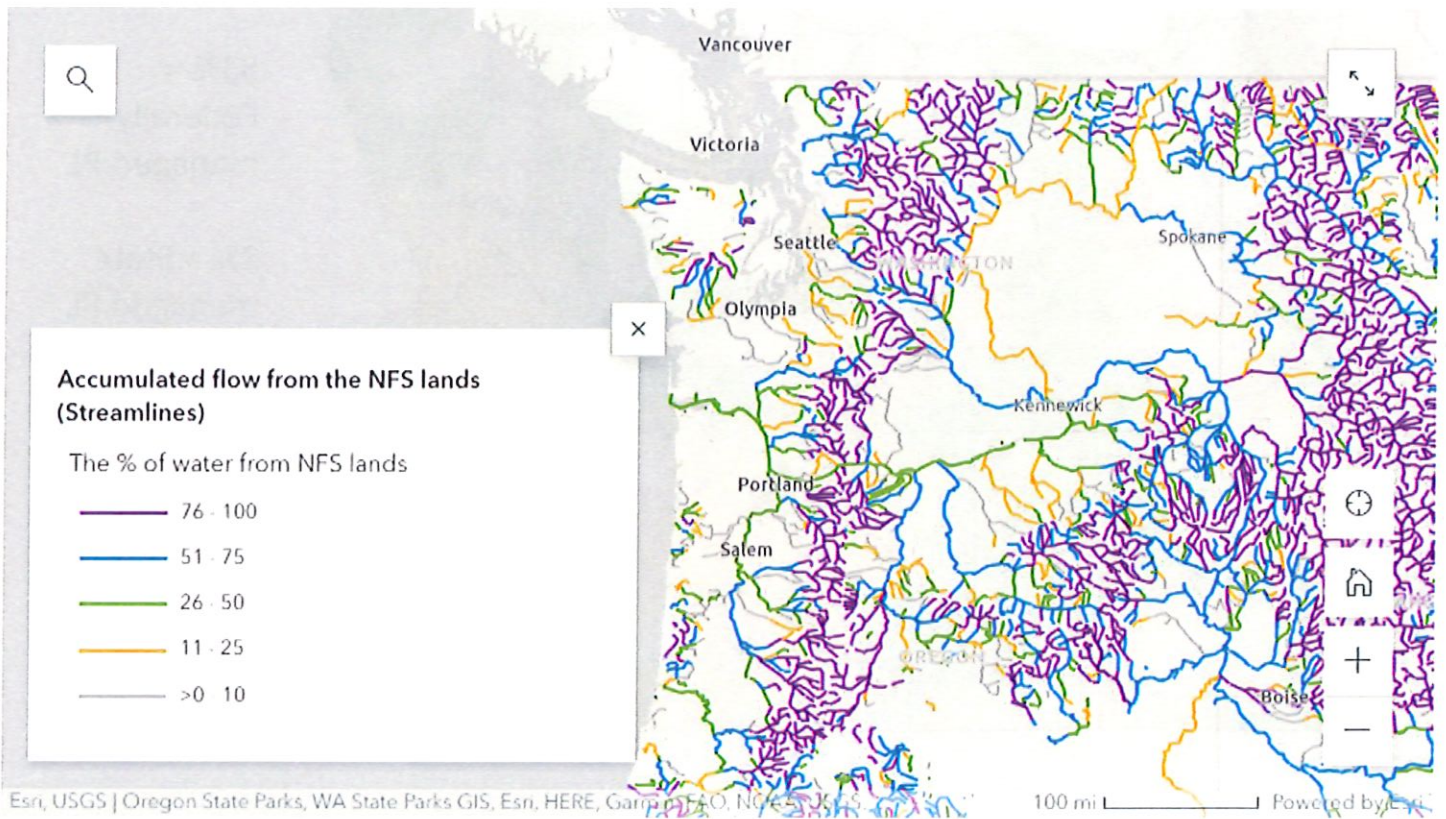
JOHN DAY (AP) — More than

CONCERNS RELATED TO DRINKING WATER



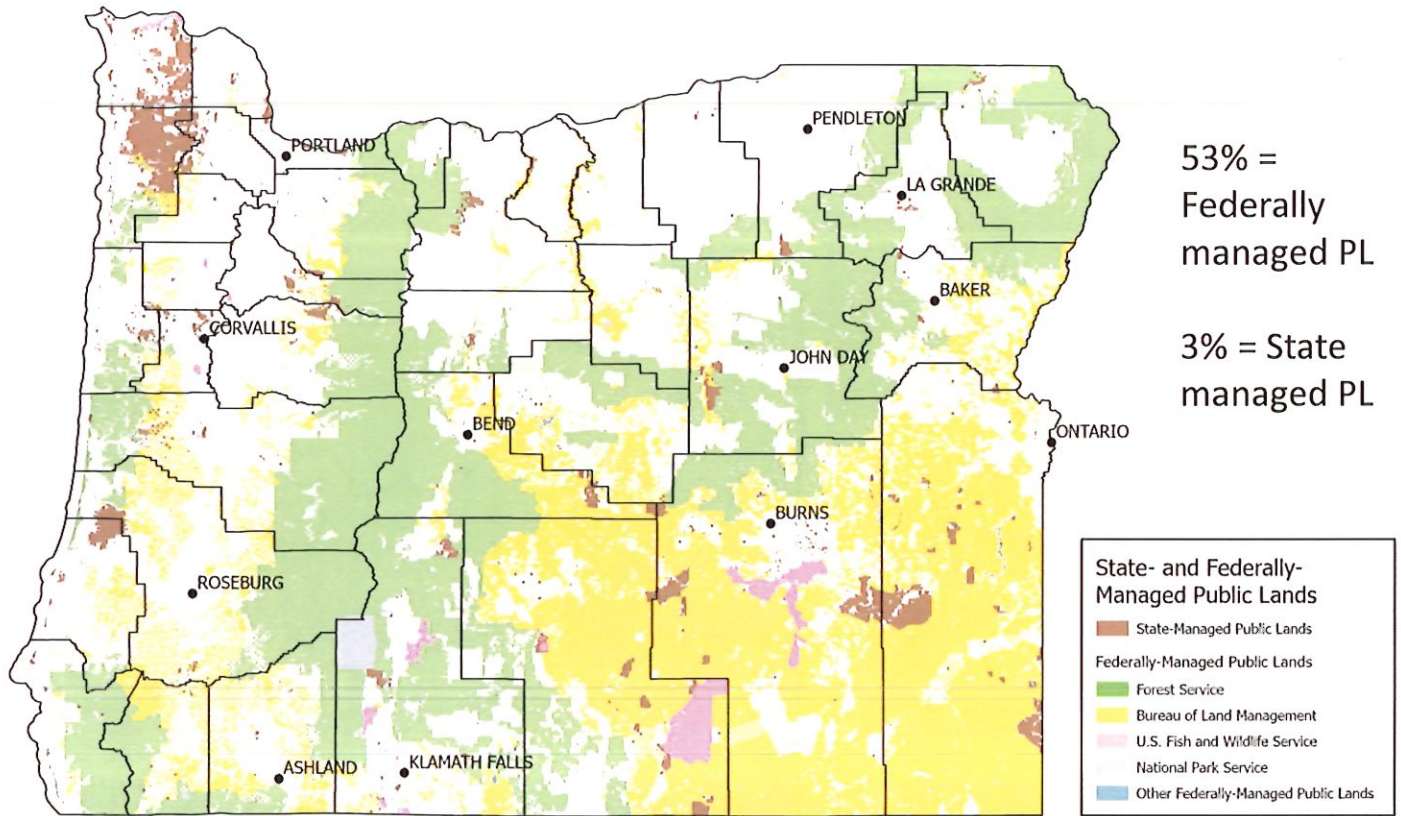
SURFACE WATER SUPPLY THAT ORIGINATES OFF USFS LANDS

% of the total 2001-2015 mean annual surface water supply from USFS lands



1 From story map: <https://storymaps.arcgis.com/stories/28f7829baf494a6e9bd8d76e9aeeaa50>

AN ABUNDANCE OF PUBLIC LANDS and THOUSANDS OF MILES OF STREAMS ...



Map Credit: Suzanne Fouty and Steven Jett



...BUT MOST STREAM SYSTEMS ARE SEVERELY COMPROMISED.



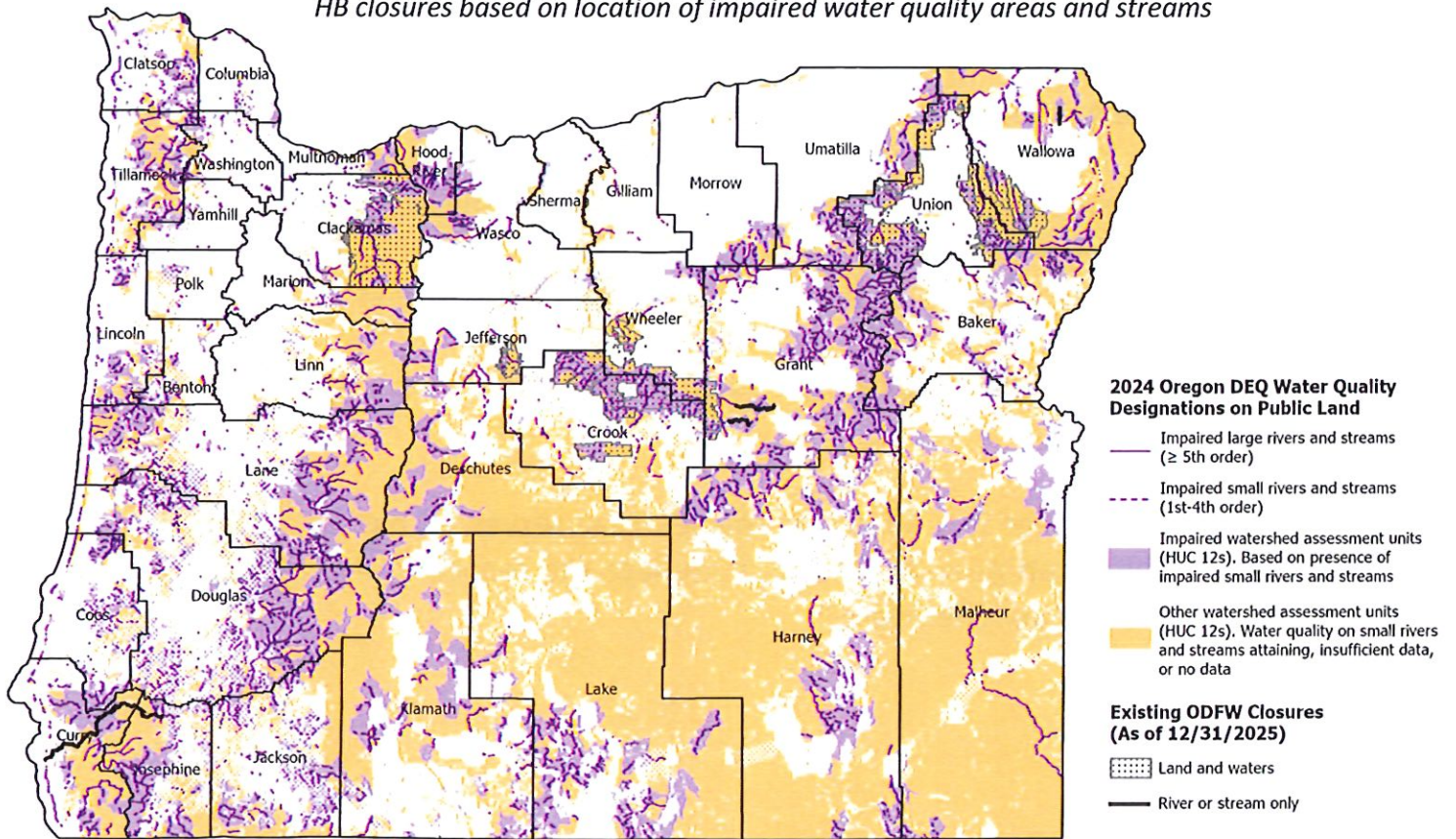
BEAVERS CAN HELP BUT TIME IS NOT ON OUR SIDE.

OUTLINE

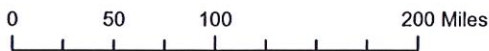
1. Scale of crises facing Oregon's human and wild communities
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 - **Closure areas related to HB 3932 and existing ODFW closures**
 - **Reasons stated for HB 3932**
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HB 3932 CLOSURE AREAS AND (PURPLE POLYGONS AND LINES) and EXISTING ODFW CLOSURES (STIPPLED AREAS) ON PUBLIC LANDS

HB closures based on location of impaired water quality areas and streams



Map Credit: Suzanne Fouty and Steven Jett



Funding for the Watershed Boundary Dataset (WBD) was provided by the USDA-NRCS, USGS and EPA along with other federal, state and local agencies. Representatives from many agencies contributed a substantial amount of time and salary towards quality review and updating of the dataset in order to meet the WBD Standards. Acknowledgment of the originating agencies would be appreciated in products derived from these data. See dataset specific metadata for further information, U.S. Geological Survey (USGS) Gap Analysis Project (GAP), 2022, Protected Areas Database of the United States (PAD-US) 3.0; U.S. Geological Survey data release, <https://doi.org/10.5066/9Q9LQ4B>

REASONS STATED FOR HB 3932

PREAMBLE TO THE BILL

Whereas beavers play an important role in improving water quality and temporary water storage, in helping remove pollutants and sediment and in regulating water temperature to ensure continuity of municipal water supplies and streams flows during drought for agricultural use and in improving the quality, connectivity and abundance of fish and wildlife habitat; and

Whereas beavers play a significant role **in decreasing the risks of wildfire¹**; and

Whereas the beaver is a keystone species that serves as nature's engineer and beavers' habitat can provide refugia, stimulate the recovery of other species and foster resilience; now, therefore,

¹ *Beavers do NOT decrease the risks of wildfires which are now climate driven, but they can help decrease the impacts of wildfire on wild and human communities during and after a wildfire.*

HB 3932: Improving Oregon's Water Quality Using Beaver: Natural Ecosystem Solutions

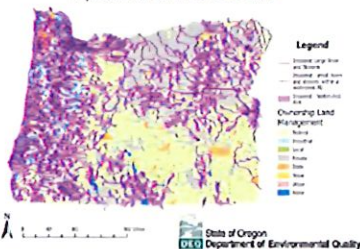
THE PROBLEM: Most of Oregon's waterways struggle with water quality issues, with many deemed "impaired" by the Department of Environmental Quality (DEQ).

- There are 310,464 miles of big rivers and small streams in Oregon, of which only 46% have been assessed for water quality data and 106,390 miles have been deemed impaired (Category 4 and 5 of DEQ's water quality classification)
- To restore impaired waterways, DEQ needs to develop TMDLs (Total Maximum Daily Load assessments) for each waterway. But TMDLs are expensive, and DEQ lacks resources to develop and implement a TMDL for every stream and watershed that needs one. As a result, most streams continue to stay impaired in Oregon

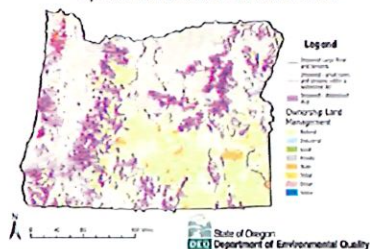
WHY BEAVERS? One of the most important ecosystem services that beavers provide is in addressing water quality issues.

- Based on the DEQ's current data, the primary factors for a waterway to be deemed impaired are: high water temperature, sedimentation, dissolved oxygen level, bio-criteria (health of invertebrates and shellfish) toxins (along the coast).
- Scientific research and literature has shown that beaver dam complexes and floodplains help to address four of these top five factors - they are nature's solution, and they tackle these issues free of charge.

Impaired Waters in the Entire State



Impaired Waters on State and Federal Lands



WHAT DOES HB 3932 DO?

- It proposes beaver hunting and trapping closure in waterways on public lands the DEQ classifies as impaired so they can provide the ecosystem services and improve water quality.
- The bill does not apply to private lands
- The bill provides an off-ramp from these regulations - if a stream is removed from DEQ's category 4 or 5 for six consecutive years, ODFW Commission can change regulations and open hunting/trapping on that particular stream to the hunting and trapping of beavers.
- It allows for take of beaver on public lands in instances of damage caused by beavers on adjacent private lands.

CURRENT BEAVER HARVEST ON PUBLIC LANDS

- ODFW's 2024 data shows state and federal public lands combined accounted for only 4% of reported beaver harvest.
- This bill is NOT about limiting beaver harvest and increasing beaver population. Instead, this bill would enable beavers to access waterways where they need to be and remain long enough to perform their ecosystem functions without getting trapped out.
- Less beaver harvest reported on public lands is likely due to low beaver presence on public lands.

Contact: Rep Pam Marsh | Rep.PamMarsh@oregonlegislature.gov

HB 3932 FLAWED ASSUMPTIONS

1. Water quality is an appropriate metric for selecting beaver trapping and hunting closure areas. **INCORRECT**
2. WQ impaired areas have habitat appropriate for dam building. **MAYBE**
3. Only areas listed as WQ impaired are important. **INCORRECT**
4. Beavers will arrive in WQ impaired areas, build dams, and improve WQ conditions. **MAYBE**
5. Beaver trapping and hunting in open areas on public lands will have no impact on WQ impaired areas, rivers and streams. **INCORRECT**

SUMMARY OF HB 3932 LIMITATIONS

1. Denies large parts of the state from receiving benefits.

- Rural SE Oregon, one of the driest parts of the state, gets almost no closures because very little water quality data collected on BLM lands.

2. The closure criteria (impaired water quality) has **ZERO** influence on whether there is habitat suitable for dam building and creation of wetlands and ponds. Creates fragmented protections.

- Water quality data were collected by agencies with fisheries, drinking water, and land use impacts in mind. Collection intended to give a broad understanding of an area's condition and so water quality monitoring sites were selectively located.
- Closed areas may have no habitat suitable for dam building while open areas an abundance. However, without dams being built and maintained, the development of desired beaver-created habitat (ponds, wetlands, expanded riparian zones, increased stream complexity) will not occur.

3. Ignores that beavers move.

- Dispersing beavers move up and down streams and can disperse miles. Fragmented protections limit population expansion and habitat creation as beavers outside the closures are shot and trapped.
- Only some water features get the 200-foot buffer as measured from the ordinary high water mark. Impaired rivers and streams get the buffer but wetlands, lakes, reservoirs, and large beaver ponds in impaired watersheds do NOT based on the language in the bill. Yet these are areas where beavers will be very active and forage on land.

Location	Dispersal distances (miles)	Source
Idaho	5.5 (linear)	Leege, 1968
Illinois	0.3 to 13	McNew and Woolf, 2005
Montana	0.2 to 19.4	Jackson, 1990
New York	2.2 ± 0.5 to 6.3 ± 1.5	Sun et al., 2000
North Dakota	9.1 ± 1.3	Hibbard, 1958
Oregon	10 ± 5.8	Maenhout, 2013
Oregon	2 ± 0.1	Petro et al, 2015
Utah	> 12.4	Doden et al, 2022
Wisconsin	4.6 (linear)	Knudsen and Hale, 1965
Wyoming	> 6.2	McKinstry and Anderson, 2002

4. Ignores that water moves and stream systems connected.

- Water moves and flows downstream. Conditions upstream, therefore, influence conditions downstream. Allowing upstream areas to be degraded or prevented from improving limits downstream recovery.
- Areas not listed as WQ impaired remain open to further degradation due to increased concentration of trapping and hunting pressure or failure of beavers to arrive and build dams due to low populations and limited dispersal.

5. Ignores that climate change is rapidly altering water and fire conditions.

- Droughts and wildfires are more frequent and severe, and river and stream system health continue to decline.
- Existing WQ data reflect past conditions. Collecting water quality data are time intensive and costly. Was never a priority for all agencies. Now even less so with slashed personnel and budgets.

6. Ignores urgency of salmon declines. Salmon need help now, not in a mythical future.

- Beavers require time to create and improve salmon habitat. They are not light switches.
- Failure to provide beavers with adequate protections means ability for beavers to build the dams, ponds, wetlands, biological reefs salmon need is compromised. Consequently, HB 3932 failed the tribes as well as the salmon and a host of other Oregon Conservation Strategy Species that need beaver-created habitat.

7. Fails to take the precautionary approach.

- Fragmented beaver protections, a result of fragmented closures, are NOT “most likely to result in conservation of native species across as broad a range of future conditions as possible, including when faced with scientific and management uncertainty.” (OAR 635-900-0017(4)).

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HB 3932 closure criteria:

- Section 2. (2) (a, b). (Public lands related)
- Section 2. (6) (b). (Private lands related)
- Section 7. (a, b). (Tribal activity related)

SECTION 2: Closure Criteria (public lands related)

(2) A person may not take a beaver for recreational or commercial purposes from

an area that is classified by the Department of Environmental Quality as belonging in category 4 or category 5 in a biennial report made pursuant to the federal Clean Water Act (33 U.S.C. 1251-1389) and approved by the United States Environmental Protection Agency [*i.e. water quality impaired*], and that is:

- (a) A stream, river or **watershed** that flows through, is on or adjoins public land.
- (b) Public land that is within 200 feet of the **ordinary high water mark** of a river or stream.

DEFINITIONS OF TERMS USED IN HB 3932 Section 2

Area: Defined in HB 3932

A stream, river or **watershed** that flows through, is on or adjoins public land

Watershed: Not defined in HB 3932

Context, however, indicates referring to what ODEQ calls a **watershed assessment unit (WAU)**. This unit is a HUC 12.

Ordinary High Water Mark (OHWM): Not defined in HB 3932 but has a legal definition.

“... **means a line on the shore** established by the fluctuations of water and **indicated by physical characteristics** such as clear, natural line impressed on the bank, shelving, changes in the character of soil, destruction of terrestrial vegetation, the presence of litter and debris, or other appropriate means that consider the characteristics of the surrounding areas.” (33 CFR 328.3(e))

WATER BODY LEGAL DEFINITIONS

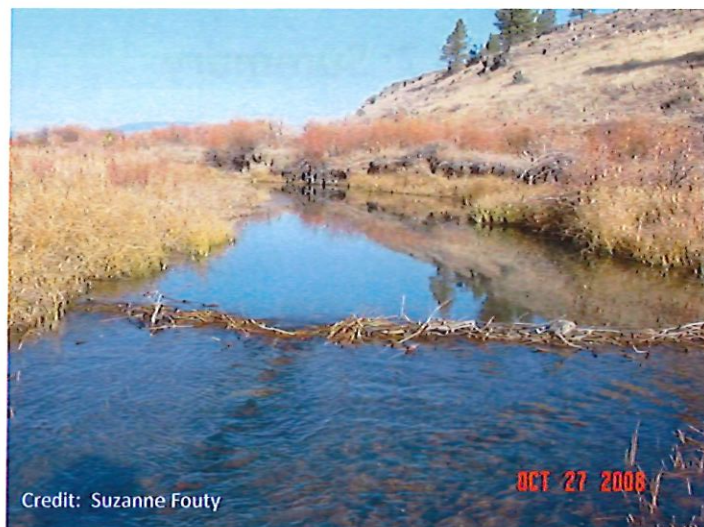
RIVER: A natural stream of water, of greater volume than a creek or rivulet, flowing in a more or less permanent bed or channel, between defined banks or walls, with a current which may either be continuous in one direction or affected by the ebb and flow of the tide. (<https://thelawdictionary.org/river/>)

LAKE: “a **standing body of open water** that occurs in a natural depression **fed by one or more streams from which a stream may flow, that occurs due to the** widening or **natural blockage** or cutoff **of a river or stream, or** that occurs in an isolated natural depression that is not a part of a surface river or stream. The term also includes a standing body of open water created **by artificially blocking or restricting the flow of a river, stream, or tidal area.** 33 CFR 323.2 (<https://definitions.uslegal.com/l/lake/>)

WETLAND: “... **areas that are inundated or saturated by surface or ground water** at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs, and similar areas.” (<https://www.epa.gov/cwa-404/how-wetlands-are-defined-and-identified-under-cwa-section-404>)

CATEGORIZING BEAVER PONDS

- a) A beaver pond contained between defined banks or walls of a river would meet the legal definition of a river. **200-foot public land closure applies.**



- b) A beaver pond that extends beyond the defined banks or walls of a river on to the valley floor would meet the legal definition of a lake. **200-foot public land closure would not apply.**



SECTION 2: Summary

- A stream, river or watershed must have water quality data indicating impairment.
 - Watersheds (*watershed assessment units, HUC 12s*), rivers, or streams without data, insufficient data, or data indicating attainment and not currently an ODFW closure area are open to beaver trapping and hunting.
- Both DEQ **and** EPA must approve the data before it can be used to classify the water quality of a watershed (HUC 12), river or stream based on data.
- 200-foot public **land** closures, as opposed to water closures, only applies to an impaired river or stream section.
 - As written in the bill, no buffer exists around wetlands, lakes, reservoirs, estuaries, or large beaver ponds that extend beyond the river banks within an impaired watershed assessment unit.
- 200-foot buffer distance measured from the ordinary high water mark.
 - Multiple features to chose from
 - Features hidden under snow

SECTION 6: Closure Criteria (private lands related)

The provisions of subsections (2) and (3) of this section **do not apply**:

- (b) below the ordinary high water line of a navigable waterway when the adjoining land is private land

SECTION 6: Summary

- Impaired river or stream must have public lands on both sides for the waterway to be closed.
- Can trap and hunt on the private land side all the way across the river or stream up until you reach the OHWM on the side of the river adjacent to public land.

SECTION 7. (Tribal activity related)

The provisions of this section do not supersede:

- (a) The treaty, statutory, regulatory or aboriginal rights or interests of a federally recognized Indian tribe; or
- (b) The ability to undertake tribal harvest activities **or cooperative management under a cooperative management agreement between a tribe and the State Department of Fish and Wildlife.**

SECTION 7. Summary

Section is clear except for language in 7(b) in red. Unclear of what this means in terms actual area closures.

- If area is closed based on HB 3932, can tribal members still go and remove as many beavers as they want?

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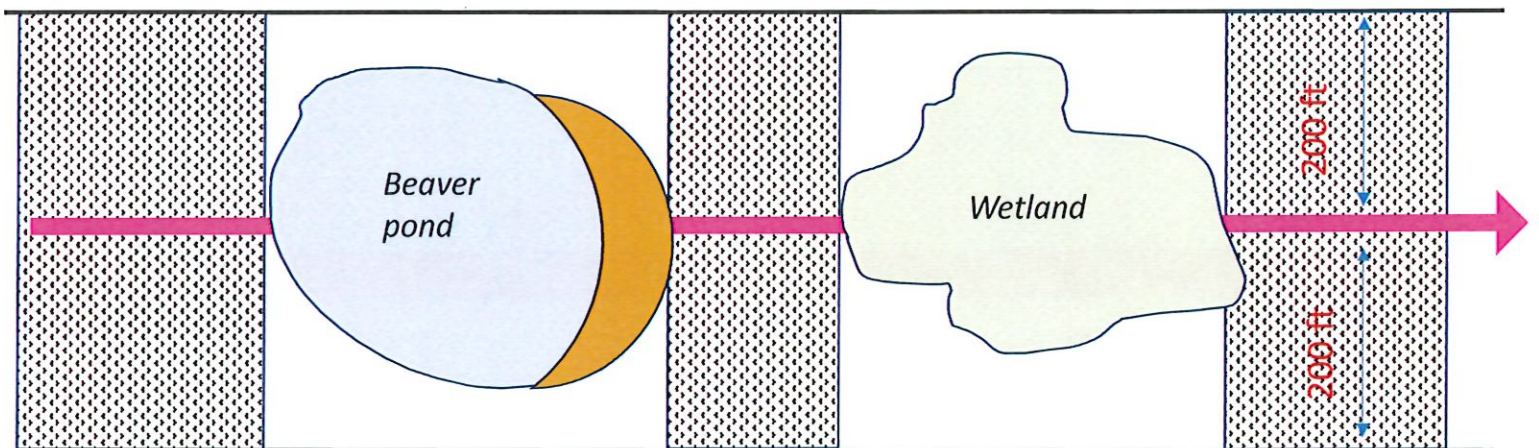
HB 3932 Section 3: Map Creation and Updates

(3) The State Department of Fish and Wildlife **shall publish a map of areas** that meet the criteria set forth in section (2) of this section, and **shall update the map every two years** in consultation with the Department of Environmental Quality.

- Maps complex because
 - water quality data are unevenly distributed,
 - patterns of public and private land distributions highly variable,
 - 200-foot buffer creates only small linear areas of protection only for impaired rivers and streams.
- **Up to 100+ new maps** may need to be created for 2026-2028 Furbearer Regulations.
- Bill has a fiscal impact as it requires time from ODFW and ODEQ staff.
- Enforcement will be difficult.

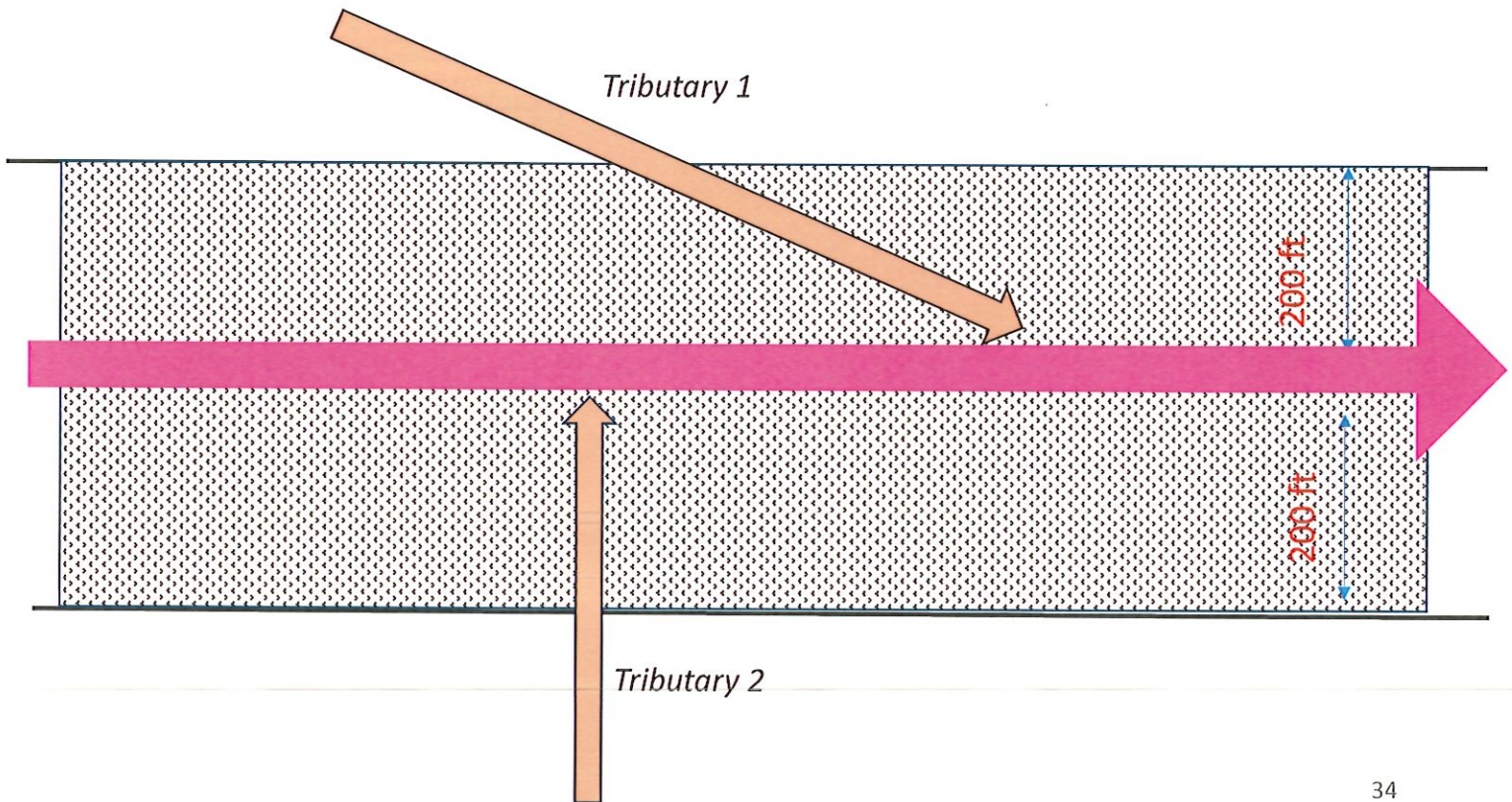
THE 200 FOOT PUBLIC LANDS CLOSURE

EXAMPLE 1: **Watershed Assessment Unit classified as impaired.** All water bodies closed but public land closure only applies to rivers/streams. Speckled area = public lands closed.

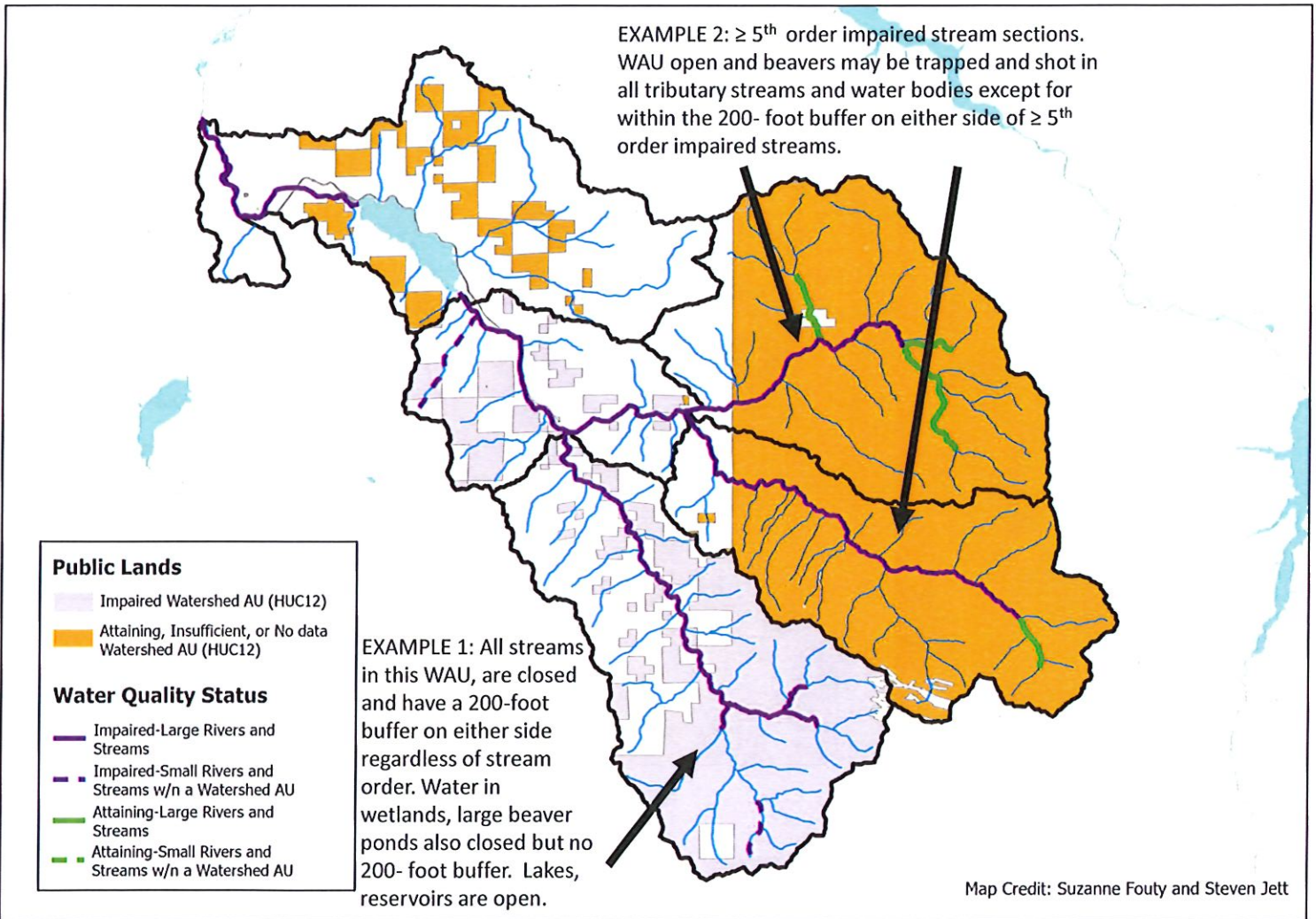


THE 200 FOOT PUBLIC LANDS CLOSURE

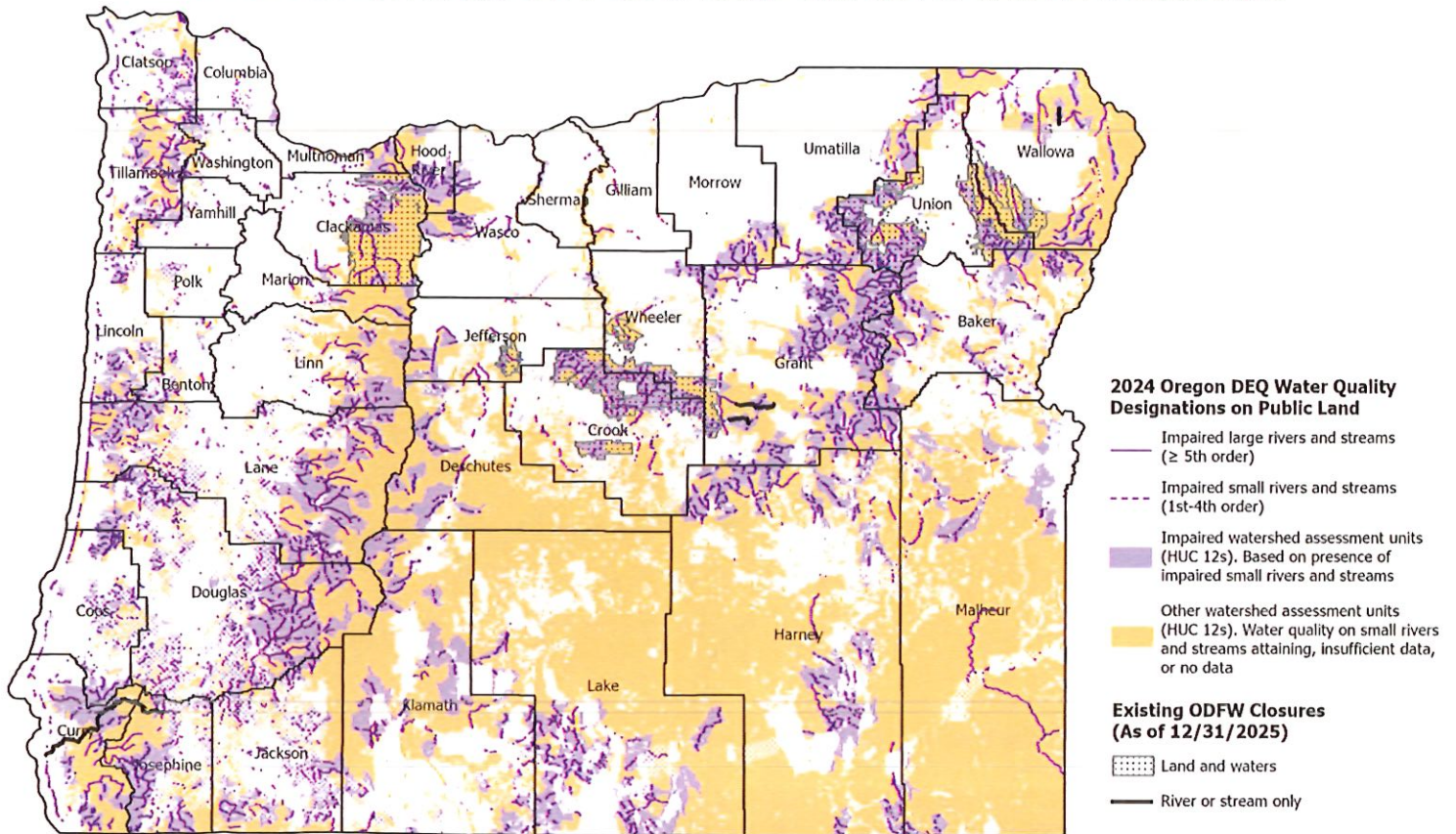
EXAMPLE 2. **Watershed Assessment Unit not classified as impaired** because no 1st – 4th order streams with data showing impairment. However, there is an impaired 5th order stream flowing through the assessment unit (HUC 12). Speckled area = public lands closed.



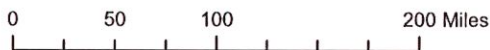
Row River Watershed (HUC10)



DISTRIBUTION OF IMPAIRED WATERSHED ASSESSMENT UNITS AND IMPAIRED RIVERS AND STREAMS ON PUBLIC LAND and ODFW EXISTING CLOSURES



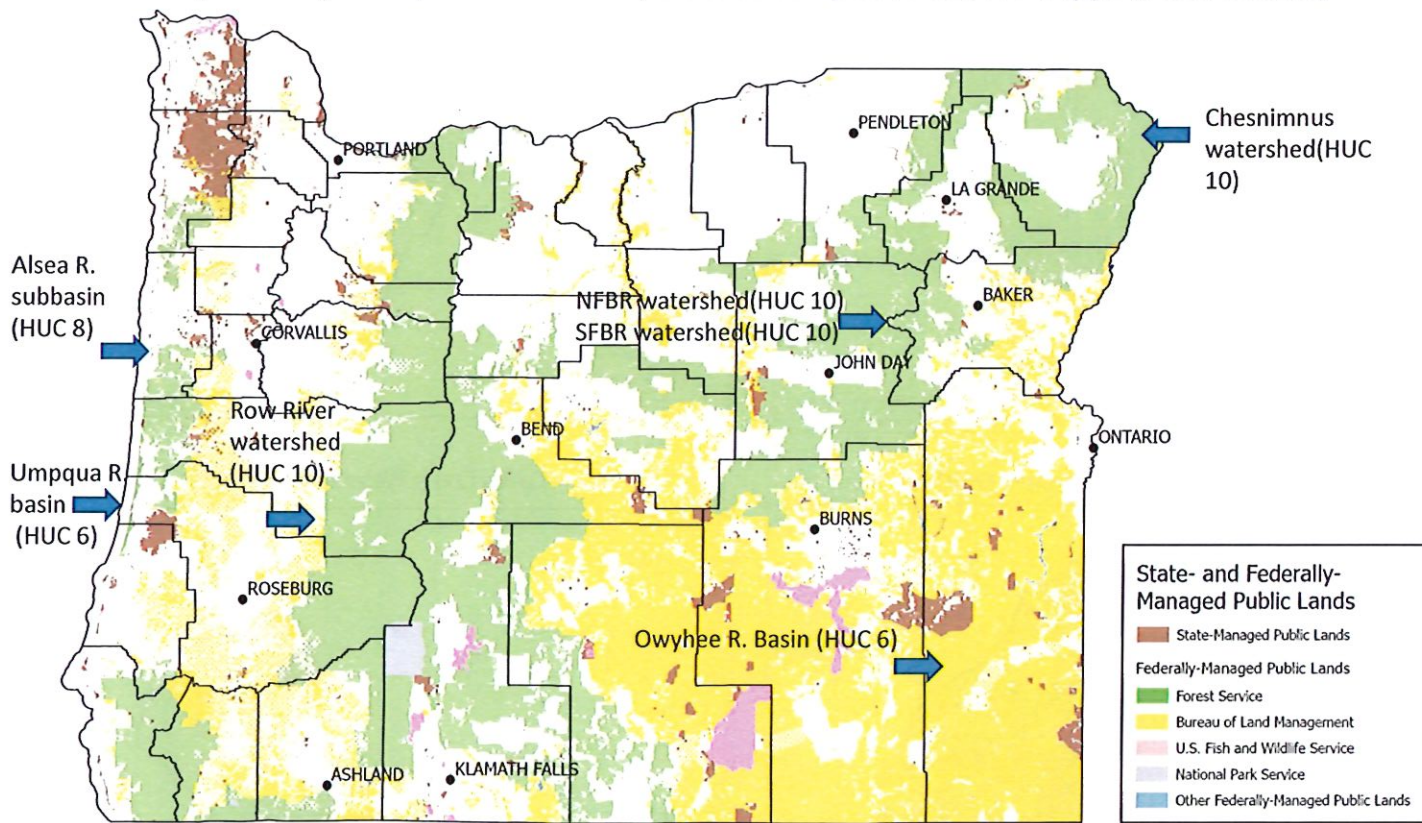
Map Credit: Suzanne Fouty and Steven Jett



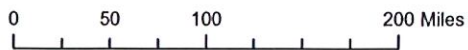
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EXAMPLES OF WATERSHED ASSESSMENT UNITS AROUND THE STATE

In following examples **ORANGE** = public lands open to beaver trapping and hunting

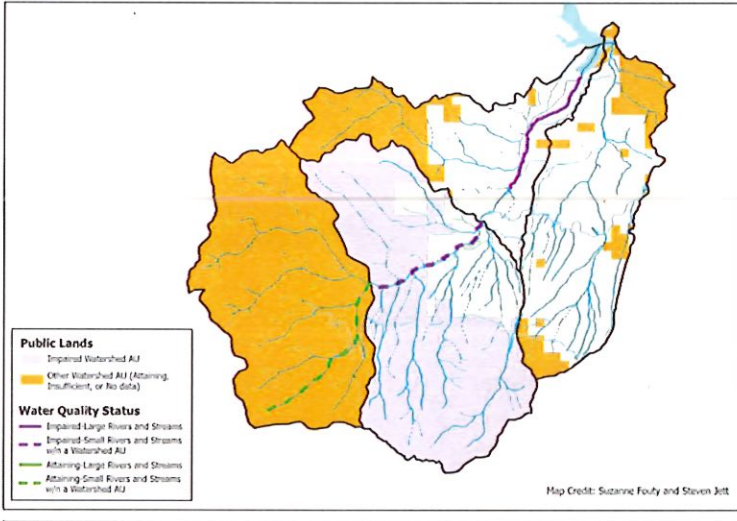


Map Credit: Suzanne Fouty and Steven Jett

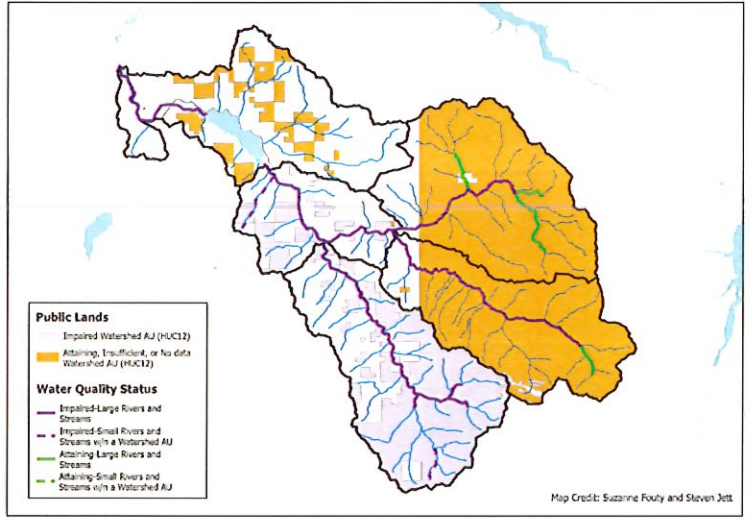


U.S. Geological Survey (USGS) Gap Analysis Project (GAP), 2022, Protected Areas Database of the United States (PAD-US) 3.0: U.S. Geological Survey data release, <https://doi.org/10.5066/P937LQ48>

South Fork Burnt River Watershed (HUC10)



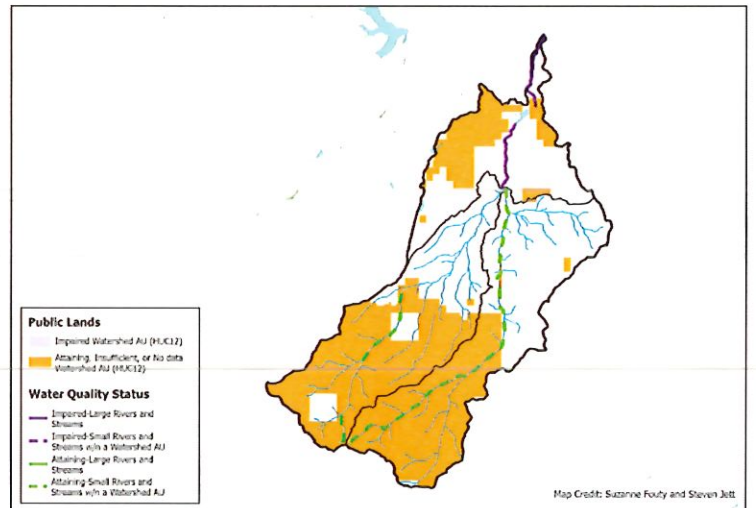
Row River Watershed (HUC10)



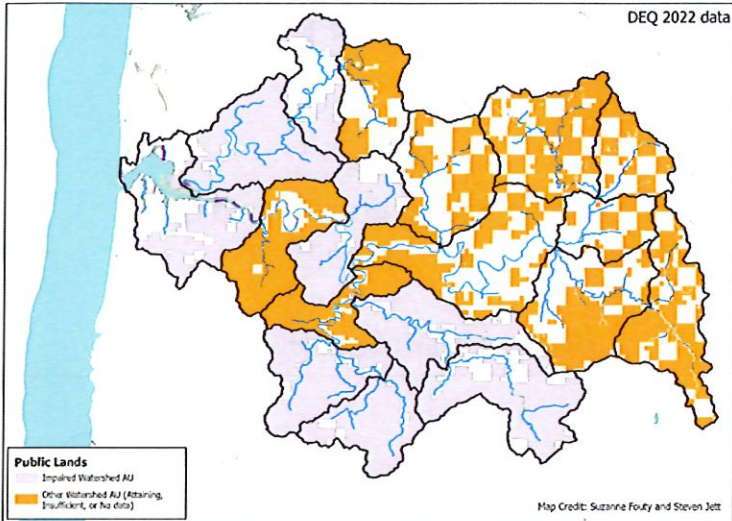
North Fork Burnt River Watershed (HUC10)



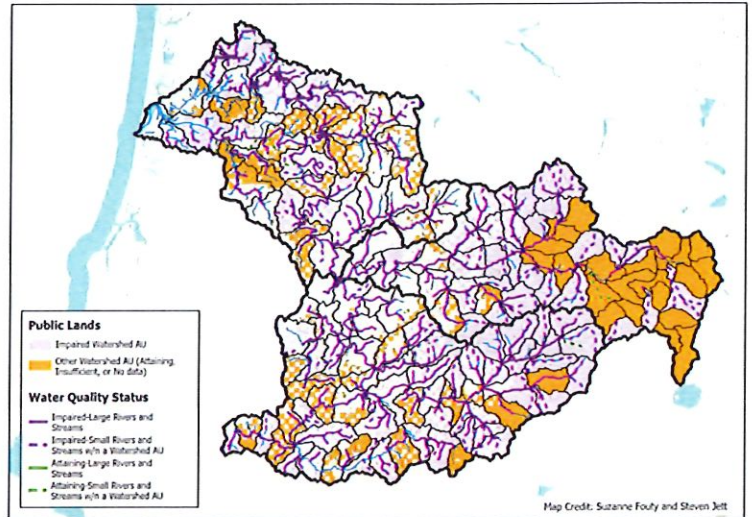
Camp Creek Watershed (HUC10)



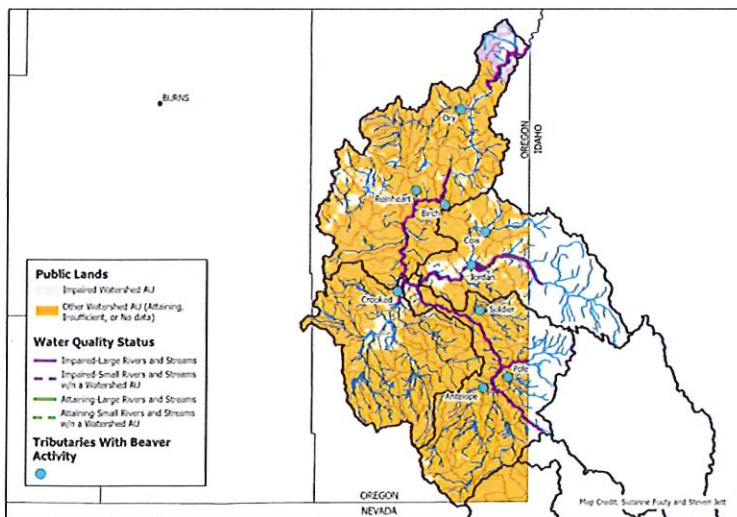
Alsea River Subbasin HUC12s



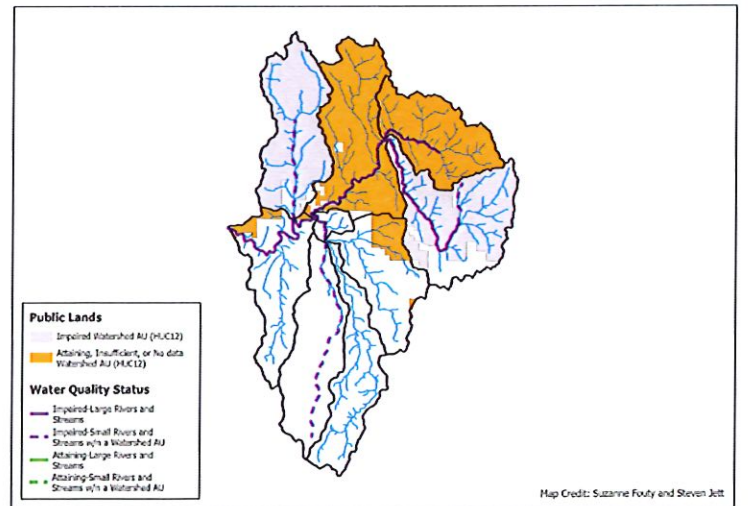
Umpqua River Basin (HUC8s & HUC12s)



Owyhee River Basin (HUC 8s & HUC 12s)



Chesnimnus Creek Watershed (HUC12s)

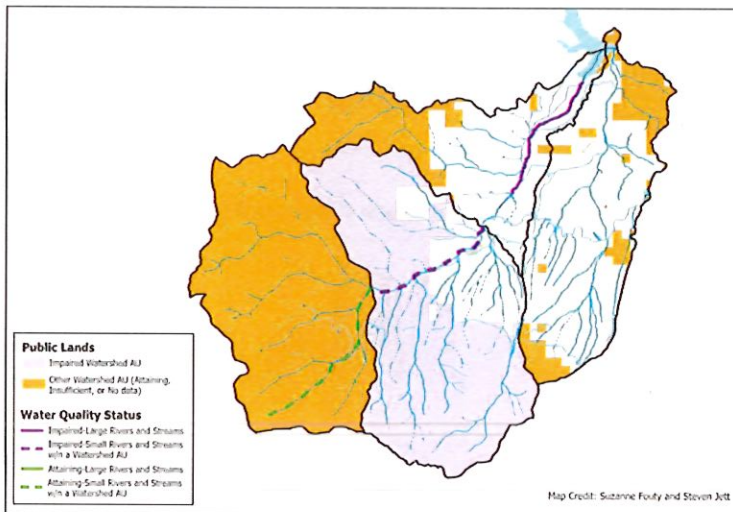


Impaired WAU versus actual area protected on public lands as result of HB 3932

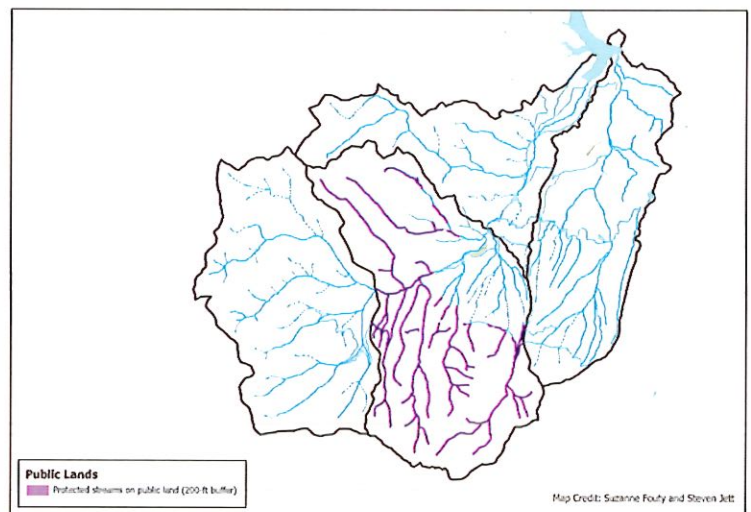
Distribution of public lands. Purple shading = impaired WAU.

Purple lines = actual area closed on public lands under HB 3932

South Fork Burnt River Watershed (HUC10)



South Fork Burnt River Watershed (HUC10)

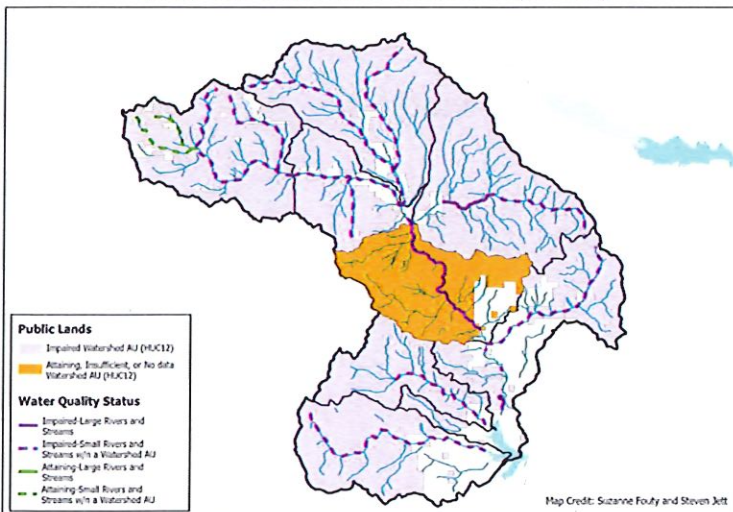


Only rivers and streams get 200-foot closure buffer. Any other water feature is closed but land around that water feature remains open.

Impaired WAU versus actual area protected on public lands as result of HB 3932

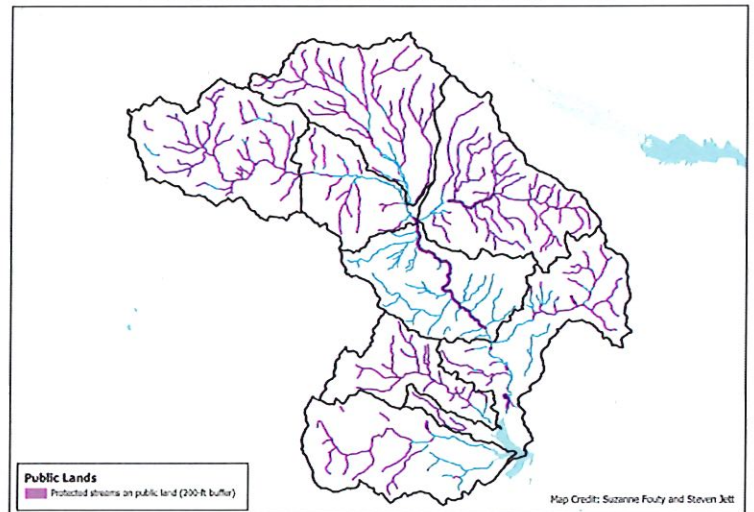
Distribution of public lands. Purple shading = impaired WAU.

North Fork Burnt River Watershed (HUC10)



Purple lines = actual area closed on public lands under HB 3932

North Fork Burnt River Watershed (HUC10)



Only rivers and streams get 200-foot closure buffer. Any other water feature is closed but land around that water feature remains open.

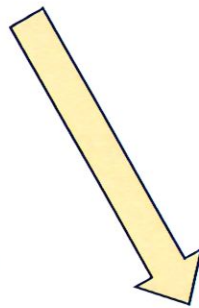
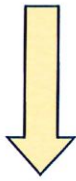
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HB 3932 CLOSURES COMPLEX AND HIGHLY VARIABLE

Water quality focus on public lands

Existing ODFW closures



≥ 5th order impaired rivers and streams outside an impaired WAUs (HUC 12)

Remain as currently described. Highly variable and overlap in places HB 3932 area.

Impaired WAUs (HUC 12s)

IF public land on both sides, then closed and public land within 200 feet of said river or stream closed

IF public land on one side and private on the other are then NOT closed.

All tributary streams on public lands in WAUs NOT classified as impaired are closed from their confluence with the impaired ≥ 5th order river for as long as the tributary is within its 200-foot closure zone.

All water bodies closed EXCEPT lakes, reservoirs, large beaver ponds and estuaries.

Public land closed BUT only if within 200 feet of river and stream.

HB 3932 CLOSURE CRITERIA BASED ON ODEQ'S WATER QUALITY CLASSIFICATIONS

ODEQ's classifications are based on:

- stream order
- available water quality data.

Stream order and water quality data both have major limitations that impact closure designations.

STREAM ORDER LIMITATIONS

Based on a high resolution NHD GIS stream layer created by the U.S. Geological Survey.

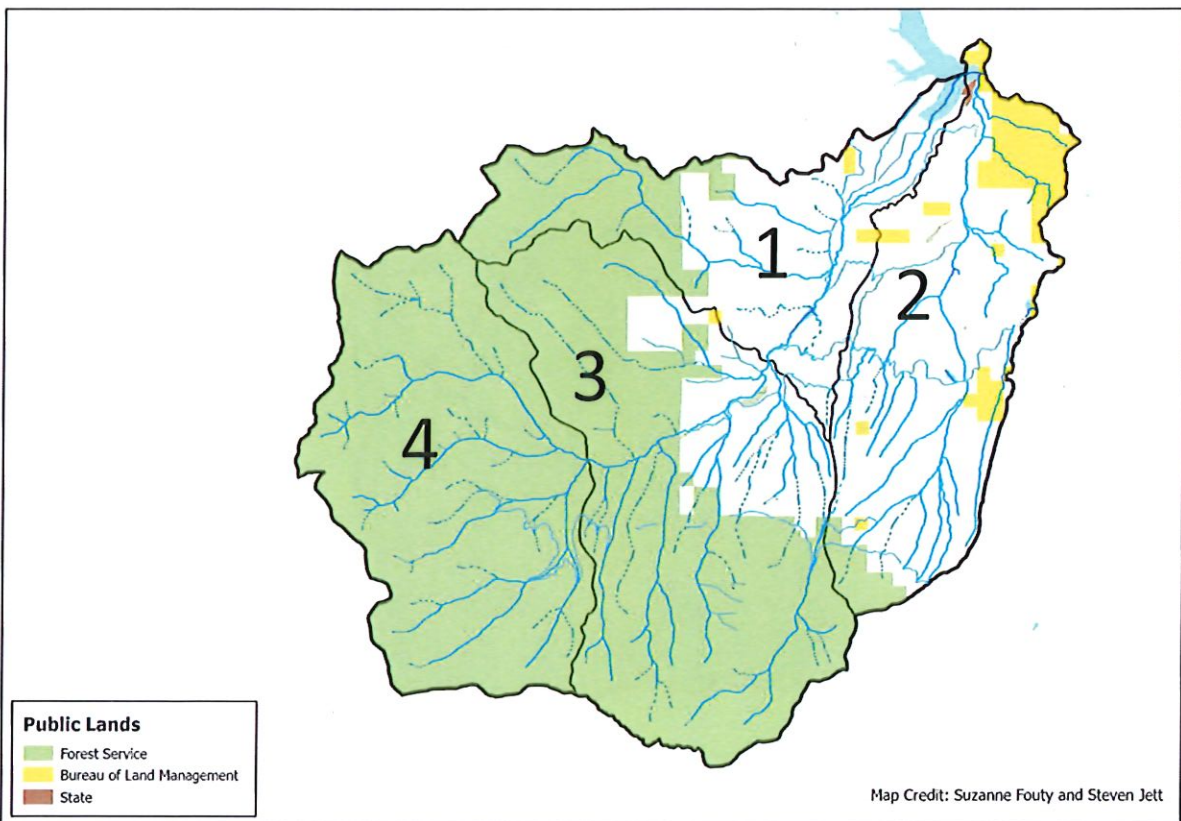
- Computer generated based on topographic criteria.
- Results not field verified.
- Many “1st order streams” are unchannelized drainages or gullies. Where this occurs stream orders are incorrectly increased downstream and may fall into $\geq 5^{\text{th}}$ order streams.
 - RESULT: Watershed assessment units (HUC 12s) that should be classified as impaired and closed, if correctly assigned to a stream order, are not.

METHOD FOR CLASSIFYING WATERSHED ASSESSMENT UNITS (WAU) BASED ON STREAM ORDER

- Conditions on 1st through 4th order streams determine WAU classification.
- If one section of a 1st through 4th order stream is WQ impaired, then the WAU is considered impaired and all stream miles within that WAU are counted as impaired when reporting to EPA.
- If two or more sections of 1st through 4th order streams have data and one is impaired, the impaired condition determines the condition for the WAU and all stream miles reported as impaired.
- If the only section within a WAU listed as impaired is a $\geq 5^{\text{th}}$ order, then the stream section is classified as impaired, but the WAU is not.

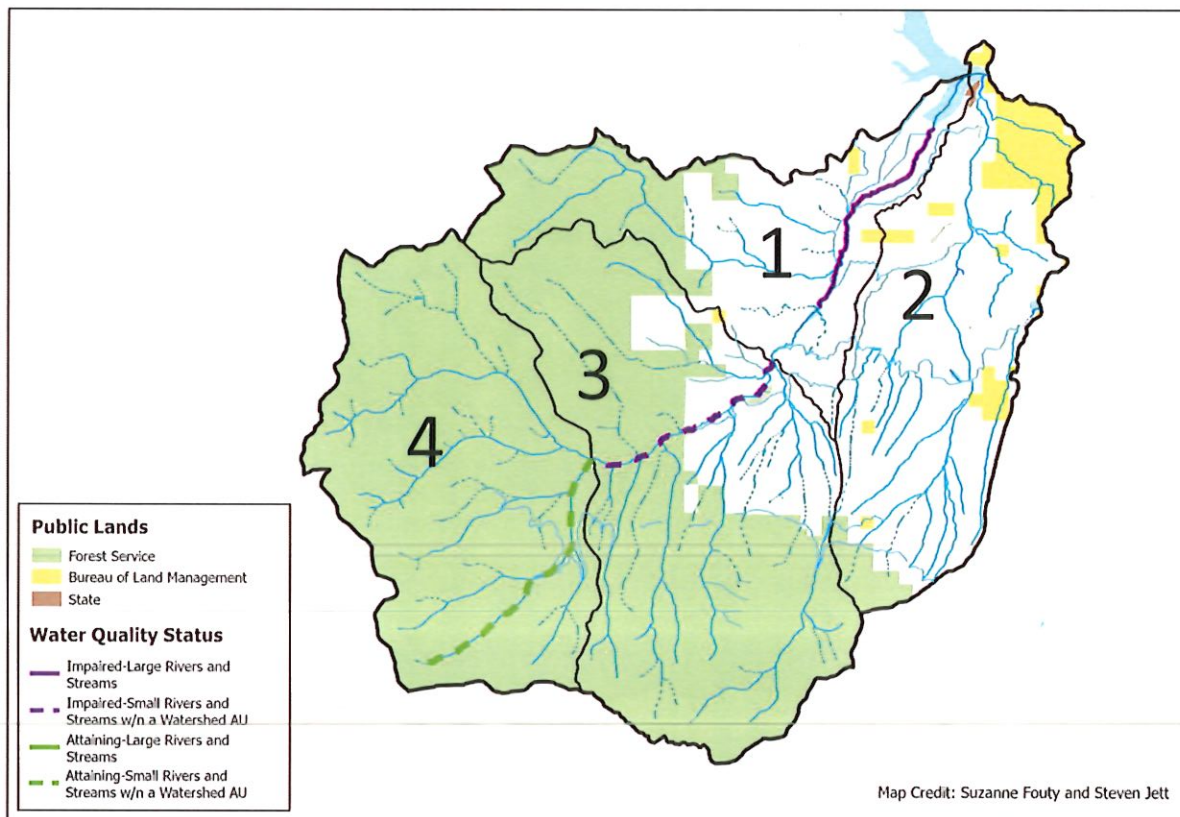
EXAMPLE OF WAU AND STREAM CLASSIFICATIONS IN A WATERSHED
(HUC 10) WITH FOUR WAUs (HUC 12s)

South Fork Burnt River Watershed (HUC10)



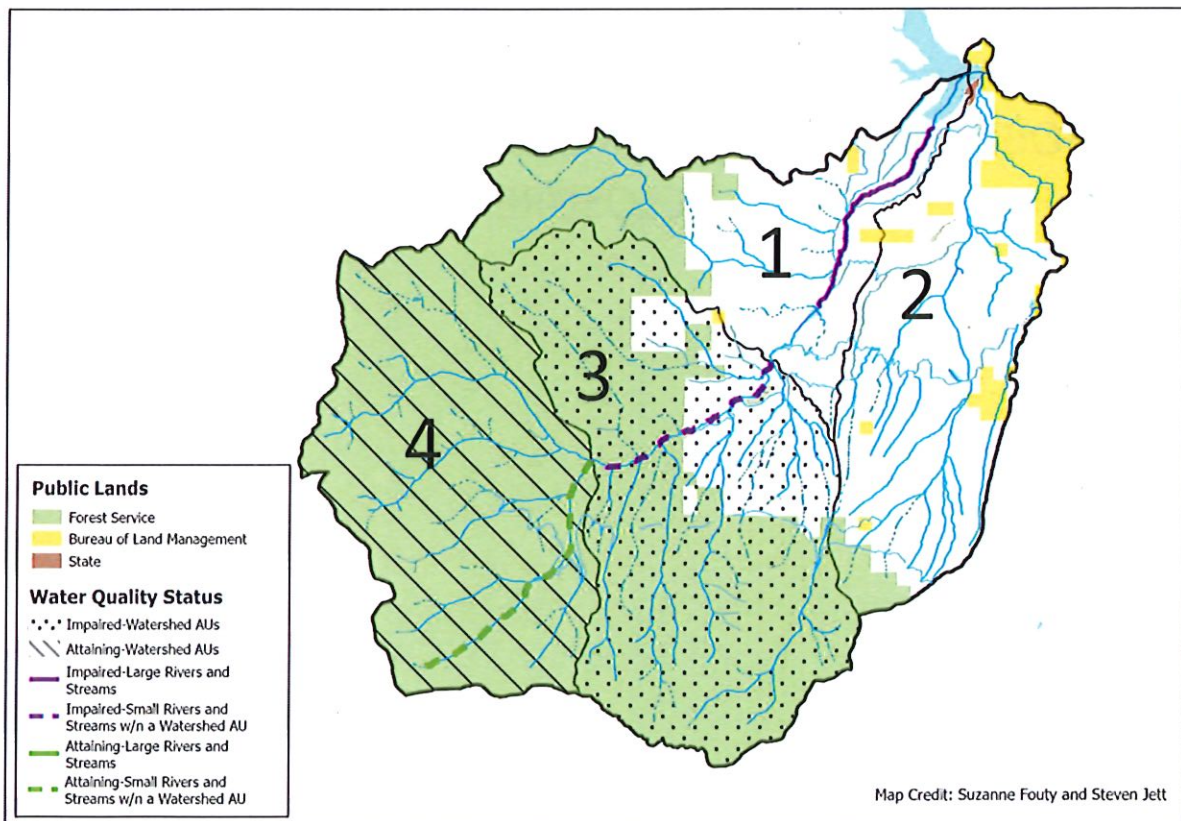
1. Identification of stream sections with water quality data, water quality status, and stream orders.

South Fork Burnt River Watershed (HUC10)



2. Based on water quality data and stream order, WAU is classified. WAUs 1 and 2 have no data for 1st-4th order streams. WAU condition unknown. WAU 3 has data showing WQ impairment. All streams in this WAU classified as impaired. WAU 4 has data showing WQ is attaining the standard. All streams within this WAU are classified as attaining.

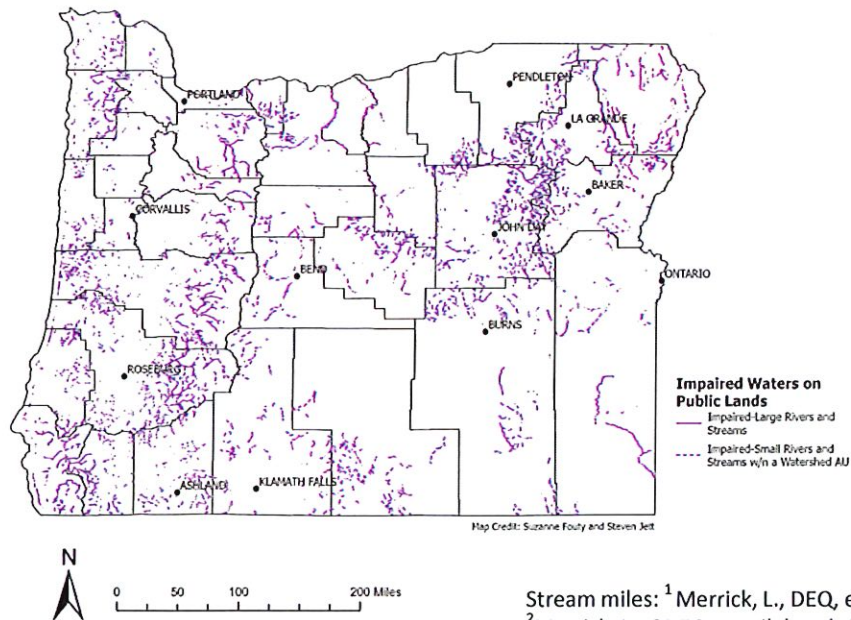
South Fork Burnt River Watershed (HUC10)



PROBLEMS WITH WATER QUALITY AS METRIC FOR CLOSURE

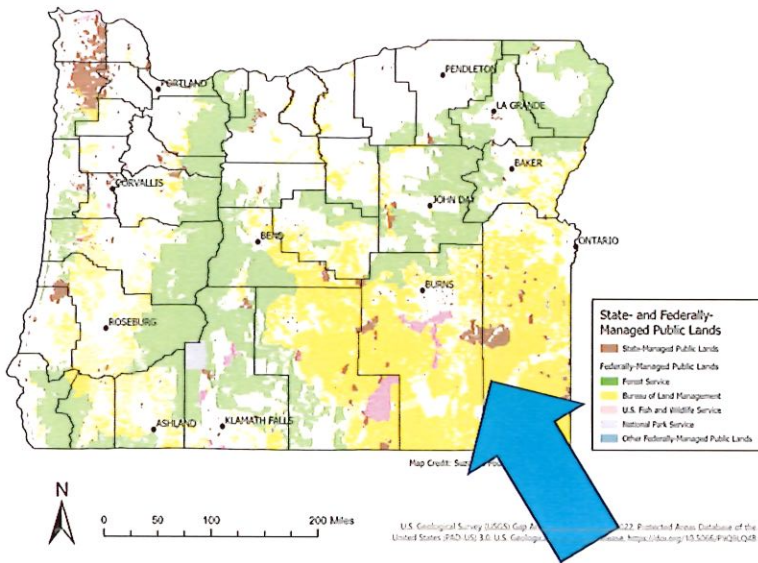
1. LIMITED WATER QUALITY DATA

- Total stream miles on public lands (state and federal) based on NHD high resolution GIS layer = **178,500¹**
- Miles assessed for water quality = **10,329²** (6.8%)
- Miles impaired = **9,654²**

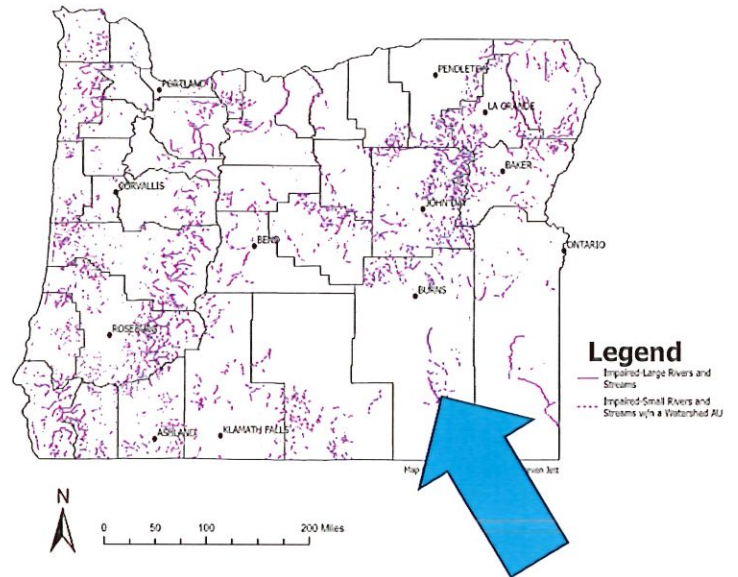


2. UNEQUAL DISTRIBUTION OF WATER QUALITY DATA ON PUBLIC LANDS

Distribution of public lands



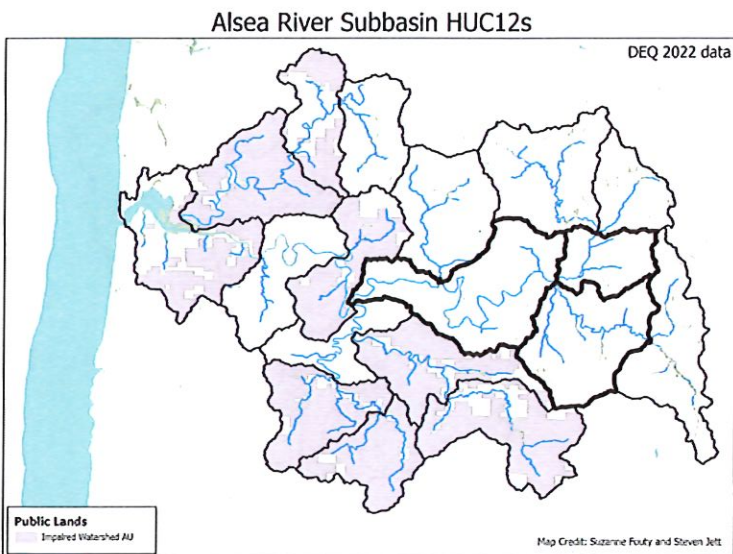
Distribution of 9,654 WQ impaired stream miles on public lands



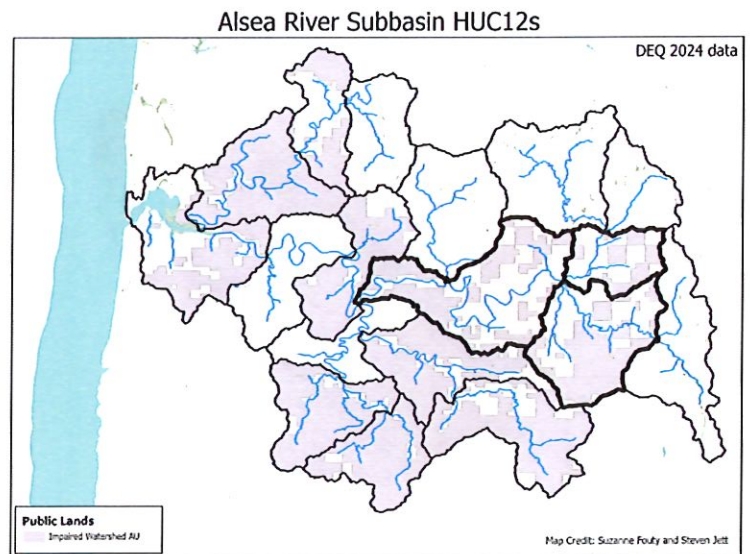
NOTE: The majority of WQ data is on National Forests. Was a past priority for the Forest Service related to fisheries, drinking water, and land management impacts. Very limited data on BLM lands in SE Oregon as not an agency focus.

3. WATER QUALITY DATA MUST BE APPROVED BY ODEQ AND EPA

DEQ and EPA Approved 2022 data



DEQ and EPA Approved 2024 data

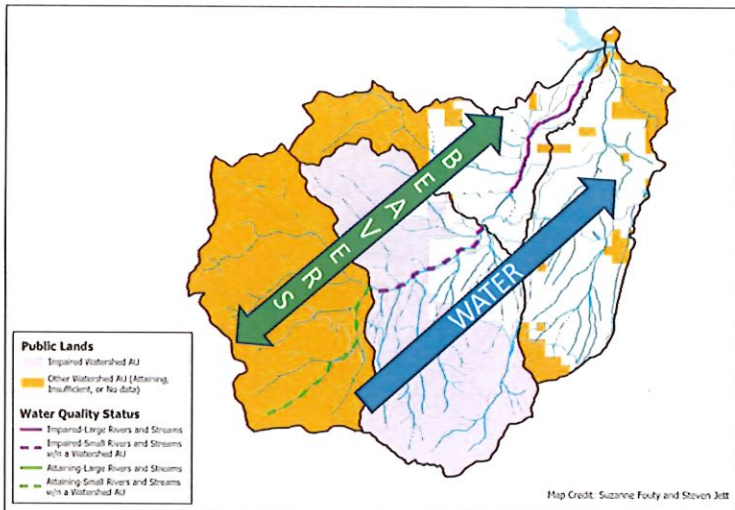


NOTE: Any future increases in closure areas, if relying on water quality data, requires first new data be collected and then both DEQ and EPA approval of data. Given current staffing levels in all relevant agencies, this will be difficult.

4. FRAGMENTED PROTECTION IGNORES HOW WATER AND BEAVERS MOVE

Distribution of public lands as a function of WQ classification

South Fork Burnt River Watershed (HUC10)

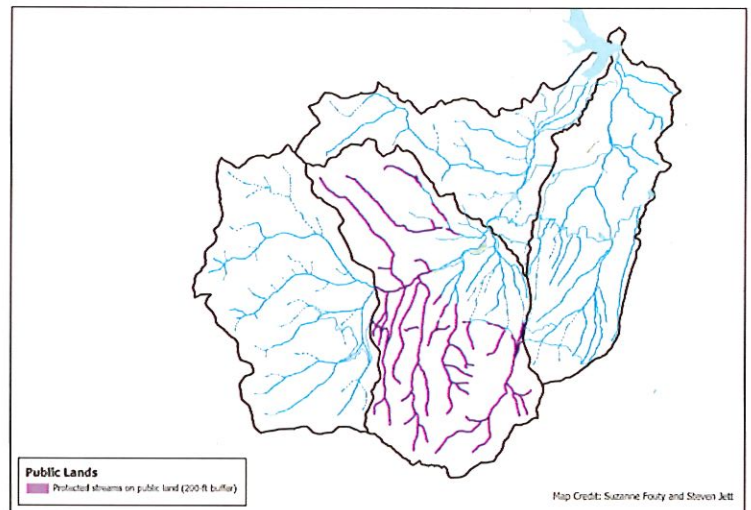


Purple shading = WAU classified as impaired.

Orange shading = WAU not classified as impaired. May have no data, insufficient data, or attaining measured parameter.

Distribution of actual area closed on public lands based on HB 3932

South Fork Burnt River Watershed (HUC10)



Only purple lines closed and 200 feet on either side of rivers and streams. Wetlands and large beaver ponds (water) closed but no public land closure around them. No closure of any lakes or reservoirs in impaired WAU.



Credit: Michael Krochta

5. NO CONNECTION BETWEEN WATER QUALITY AND PRESENCE OF HABITAT SUITABLE FOR BEAVER DAM BUILDING AND WETLAND CREATION.

Suitable habitat is a function of:

- Stream size (1st – 4th order streams), stream gradient, vegetation, valley bottom widths, stream flow, climate.
- Historic and current human activity such as livestock grazing and activities that lead to climate change.
- Time.

Finding suitable habitat **REQUIRES** beavers be able to safely disperse and find areas they deem suitable for dam building.

Fragmented protections limit expansion.



Photo: Suzanne Fealy



6. AREAS WITH DESIRED CONDITIONS CAN BE TRAPPED AND HUNTED AND DEGRADED.

IF THESE AREAS OUTSIDE a water quality impaired area on public land, and not already an existing ODFW closure, then HB 3932 allows beaver trapping and hunting.

Loss of beavers leads to dam failing, ponds draining, and wetlands and riparian areas drying out.

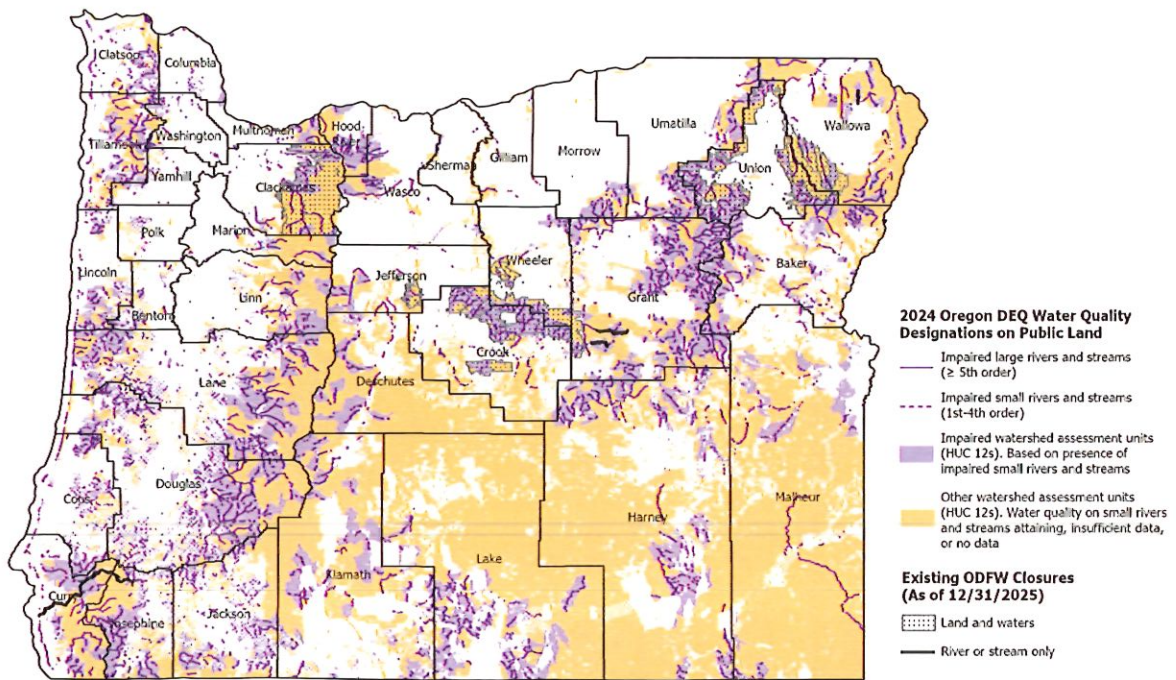


OUTLINE

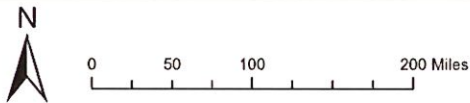
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WHY A FULL PUBLIC LAND AND WATERS CLOSURE?

HB 3932 closures are too narrowly focused and fragmented and existing ODFW closures too few and disconnected. All of the Orange, unless part of existing ODFW closure, is open to beaver trapping and hunting.



Map Credit: Suzanne Fouty and Steven Jett

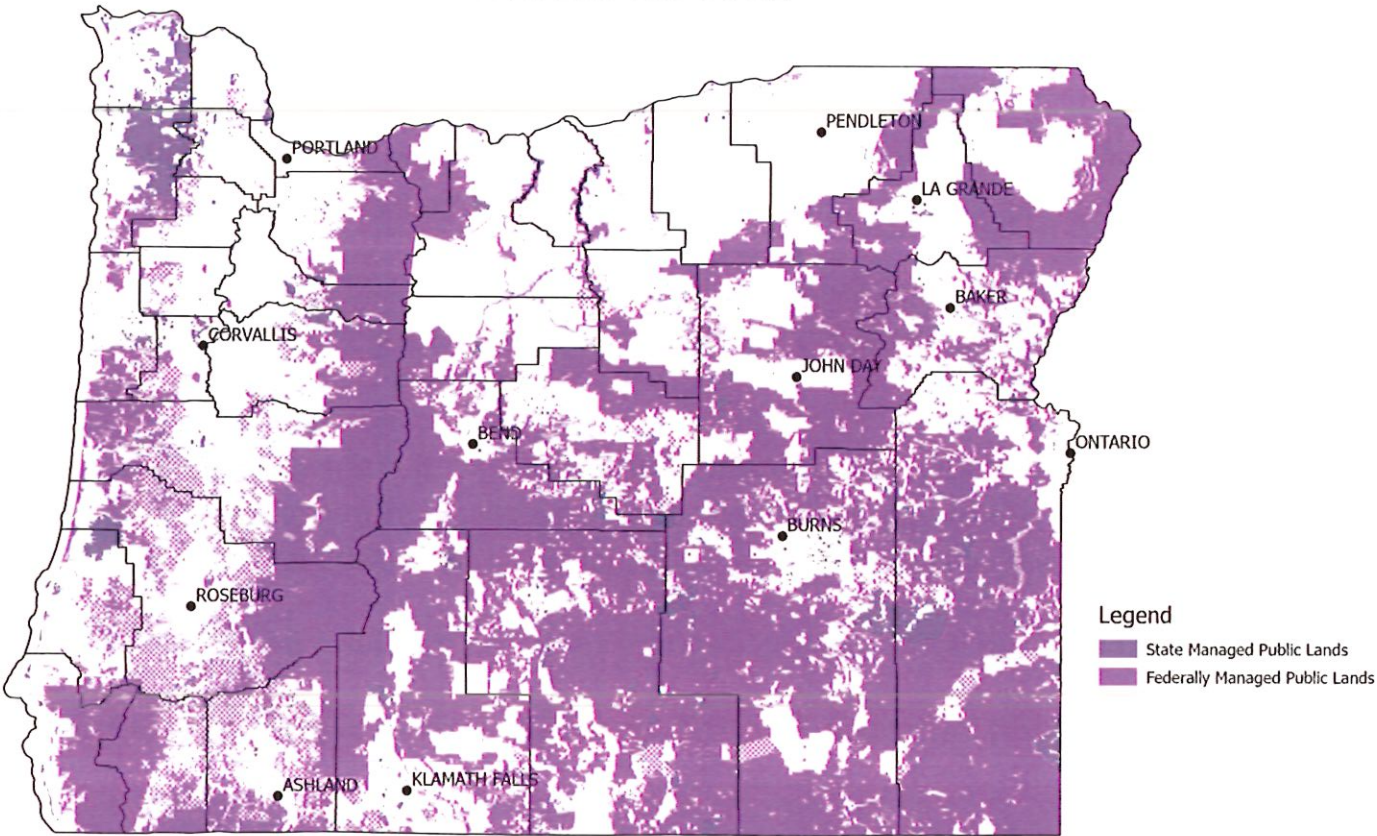


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BENEFITS OF A FULL PUBLIC LAND AND WATERS CLOSURE

- Fairer to human and wild communities. Current closures are a complicated patchwork of closures, one that disadvantage many rural communities.
- Beavers can disperse miles when searching for a settlement site and limited or fragmented trapping and hunting closures compromise successful dispersal.
- Expands areas that encompass varying habitat quality where beavers are protected from human predation which maximizes potential for expansion of beavers and benefits.
- Droughts and wildfires are more frequent and severe and state-wide. Water and habitat needs are getting greater so need to accelerate restoration of stream systems and natural water storage on public lands while we still can.
- Stream conditions are continuing to degrade so action needed now.
- Simplifies ODFW administration and costs related to beaver trapping and hunting as it applies to closures while maintaining future options.
- Retains ODFW flexibility as it pertains to future beaver trapping and hunting on public lands.

DISTRIBUTION OF A FULL STATE AND FEDERAL PUBLIC LANDS AND WATERS CLOSURE



0 50 100 200 Miles

U.S. Geological Survey (USGS) Gap Analysis Project (GAP), 2022, Protected Areas Database of the United States (PAD-US) 3.0: U.S. Geological Survey data release, <https://doi.org/10.5066/P9Q9LQ4B>

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 - Issues
3. Benefits of full public lands and waters closure
4. **Recommended language change and who decides**
5. Conclusions

RECOMMENDED DRAFT MOTION LANGUAGE CHANGE

The recommended language change is required in order to better address the scale of water and habitat challenges facing Oregonians, and its fish and wildlife.

Beavers are not a light switch. They require time to build the desired habitat and improve conditions in places with habitat suitable for dam building. Failure to give them broad protections eliminates future improvement potential as conditions continue to degrade.

ODFW DRAFT MOTION: I move to approve staff proposals as shown in Attachment 3 and amend Oregon Administrative Rule Chapter 635, Division 050 as proposed by staff and shown in Attachment 4, to set regulations and seasons for the harvest and pursuit of furbearing mammals. (2026 Exhibit C – Attachment 1)

RECOMMENDED MOTION: I move to approve staff proposals as shown in Attachment 3 and amend Oregon Administrative Rule Chapter 635, Division 050 as proposed by staff and shown in Attachment 4, to set regulations and seasons for the harvest and pursuit of furbearing mammals, **except that Section 635-50-0070 would be modified to read as follows:**

“All public lands and the waters that reside on them, flow through them, or have one side bounded by public lands and not currently closed under HB 3932, are hereby closed. All existing ODFW closures are hereby incorporated into this closure.”

WHO MAKES THE FINAL DECISION ON THE SCALE OF BEAVER PROTECTIONS ON PUBLIC LANDS AND WATERS?

The **seven members of the 2026 Oregon Fish and Wildlife Commission** make the final decision. Therefore, in those areas which ODFW currently has jurisdiction over, accountability for future water resources and fish and wildlife related habitat outcomes that beavers can help with via the habitat they create and maintain rest entirely with these seven individuals.

The ODFW staff has given the Commissioners intentional and explicit flexibility in decision making, via the language they submitted to the Oregon Secretary of State on April 30, 2026 in the *Notice of Rule Summary Making* (p.8 and below).

AMEND: 635-050-0045

RULE SUMMARY: These amended rules are related to furbearer harvest, bag limits, area closures, reporting, residency and transaction of pelts for the 2026-2027 and 2027-2028 furbearer harvest and pursuit seasons. Notable proposals amend rules regarding beaver harvest on public lands. **The Commission may decide to adopt staff recommended proposed rule and rule amendments as proposed in the attachment, or the Commission may decide to modify the proposed rules or not adopt some or any of the proposed rule amendments.**

CONCLUSIONS

1. We must go big if we want water and habitat expansion.
2. The decision of these 7 commissioners determines our future.
3. Further delays, studies, action plans, work groups, meetings only increases risk and harm to Oregonians, and our fish and wildlife.



DECISIONS ARE BASED ON VALUES. SCIENCE HELPS US SEE OUTCOMES OF THOSE DECISIONS. WHAT DO YOU VALUE AND WANT IN YOUR FUTURE?



Credit: Dr. Joe Wheaton, CC-by-4.0



Photo: Pete Bengeyfield



Photo: Peter Dinklage / Courtesy of the Wild Salmon



SETTING THE RECORD STRAIGHT:

POPULATIONS AND DISTRIBUTIONS

HABITAT AVAILABILITY

CLOSURE EFFECTIVENESS

SIGNIFICANCE OF BEAVER REMOVAL FROM PUBLIC LANDS

TRAPPING AND HUNTING RESTRICTIONS

CARNIVORE CONTRIBUTIONS

Dr. Suzanne Fouty
Hydrologist
retired USDA Forest Service

OCT 29 2007

REASON FOR THIS POWERPOINT

Oregon Fish and Wildlife Commission (Commission), members of the Oregon Hunters Association, the Trappers Association, and state legislators place a great deal of weight on information provided by ODFW staff. Unfortunately, staff work loads are high which limits how much time they can spend on a topic. Having worked for the Forest Service as a water resource and soil specialist for 16 years I appreciate the limits of what ODFW staff can research given their work loads. The result is, however, that sometimes the information presented is incorrect, misleading, or does not include relevant information. This limits the ability to have productive conversations about the pros and cons of a beaver trapping and hunting closure on public lands because everyone does not have the same information.

Similar objections to a closure have been raised each time the request for a beaver trapping and hunting closure on public lands, and the waters that flow through or reside on those lands, has come before the Commission (2020, 2022, 2024). Unfortunately, the 3-minutes of testimony allowed by the Commission for members of the public during the public comment time makes it impossible to clear up misconceptions about closures, supply missing relevant information, or correct incorrect statements.

This PowerPoint, which is part of my written testimony, will therefore address points frequently raised in opposition to a full closure. Examined will be: closure effectiveness, habitat availability, take numbers off public lands, and wild predation contributions. The perspective of “custom and culture” is mentioned but focus is on the science. The goal is to fill in information gaps and correct misinformation for the Commission, our ODFW staff, and the public.

Suzanne Fouty, PhD
June 22, 2026

WHY BEAVERS?

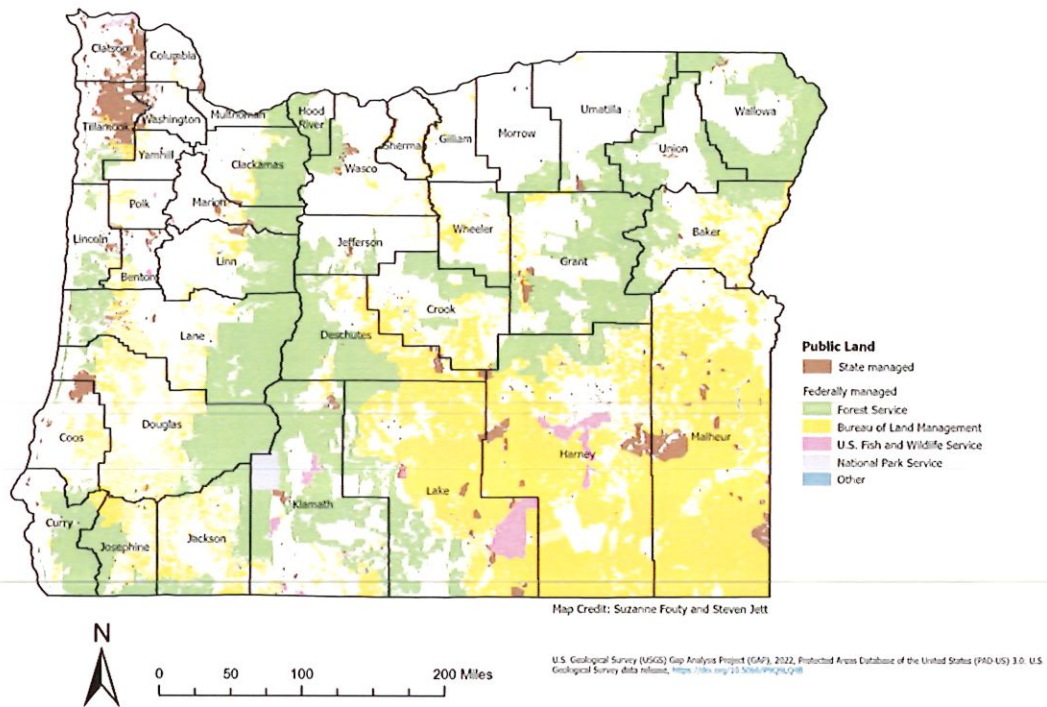
THEY ENHANCE OUR WATER RESOURCES AND FISH AND WILDLIFE HABITAT AND WE NEED A LOT MORE OF BOTH!

When beavers build dams they create ponds, wetlands, and expanded riparian vegetation zones. These features create a host of needed water-related and habitat-related benefits for people, fish, and wildlife. Beaver dams do not require costly and time-consuming permits, or land management agency analysis, or tax payer dollars spent doing restoration in a stream section. Even better is that beavers do the initial construction and then maintenance for free if they continue to be present in the area. Beavers doing the work in these places makes \$\$\$, skills, and time available for people to work on degraded areas that beavers can't repair or won't be able to without some help from us.



WHY THE FOCUS ON PUBLIC LANDS?

Oregon is blessed with an abundance of public lands (53% = Federally managed, 3% = State-managed) and waters. Much of this land is in large blocks and in many cases serve as the source of water that Oregonians depend on. They are important areas for fish and wildlife. The distribution of public lands and waters across the state means that many human and wild communities have the potential to experience some of the benefits from the habitat that beavers create and maintain.



TO CLOSE OR NOT TO CLOSE ALL PUBLIC LANDS AND WATERS TO BEAVER TRAPPING AND HUNTING – THAT IS THE QUESTION.

Despite the many benefits beavers can bring to communities, worth in the hundreds of millions to billions of dollars (Campbell et al., 2007; ECONorthwest, 2011; Ermer, 1984; Niemi, et al., 2020; Thompson et al., 2021), ODFW continues to allow beavers to be trapped and shot on most public lands and waters from November 15 to March 15.

Two main arguments are used as reasons to continue this largely recreational activity (minimal commercial value).

1. CUSTOM AND CULTURE RELATED
2. SCIENCE RELATED

LET'S EXPLORE THE POINTS RAISED IN OPPOSITION....



EXAMINING THE CUSTOM AND CULTURE PERSPECTIVE

CUSTOM AND CULTURE PERSPECTIVE

The custom and culture perspective is about values.

How important is water, fish and wildlife to us, to our communities? What do we need and what do we want related to water, fish and wildlife? Who benefits from keeping the status quo in place, who loses? Is helping our neighbors far and near, wild and human, thrive in time of changing conditions important to us? Do our recreational pursuits (wants) take precedence over the needs of fish and wildlife and human communities?

Public lands allow multiple use and this is a use.

The current ODFW furbearer regulations allow beavers to be trapped and shot from Nov 15 to March 15. A 130 individuals in Oregon out of 4.2 million Oregonians do this activity on lands under ODFW's jurisdiction. Only some of the 130 do the activity on public lands.

Ceasing to be able to do an activity one enjoys can be emotionally challenging. However, stream, riparian, and habitat conditions are deteriorating (more droughts, more wildfires, less water, fish and wildlife declining, poorer water quality) and the effects are being felt by Oregonians. Improving the health of stream systems on public lands to the maximum extent possible is critical for Oregon's water future and will benefit human communities and fish and wildlife. Improvements require abundant beavers and the expansion of their habitat on public lands if restoration is to occur at the speed and scale necessary to help minimize some of the impacts from a changing climate. Trapping, and to a lesser extent shooting beavers, removes beavers from the population. It is a mortality cause that people control and ODFW has jurisdiction over on public lands (except for areas currently closed under HB 3932).

Decisions are based on values.

Science and economics provide information on the likely outcomes of different values decisions. They allow us to anticipate expected outcomes of choices and examine them against what is important to us.

WHAT DO YOU VALUE AND WANT TO HAVE IN YOUR FUTURE?



Photo credit: Geoff Gerdes



Photo: Pete Benguefield



Photo credit: Michael Krochta



Photo credit: Suzanne Fouty

Abundant temporary, natural water storage and quality fish and wildlife habitat – What beavers can create and what we desperately need but it requires abundant, dense beaver populations.



Photo credit: Joe Wheaton

STATEMENTS BEHIND A REFUSAL TO DO A
FULL PUBLIC LANDS CLOSURE
and
THE SCIENCE BEHIND THE PUBLIC LANDS
CLOSURE REQUEST

HABITAT AVAILABILITY RELATED

ODFW (2020): “Beavers required 18 acres of willows/colony of beavers per year” (ODFW, 2020–2021 and 2021–2022 Oregon Furbearer Regulation Proposals June 12, 2020, p. 8).

ODFW presented this number to OFWC in a 2020 PowerPoint as evidence that absence of beavers on public lands was the result of lack of suitable habitat, not trapping.

RESPONSE: In the same presentation, ODFW stated that beavers “*Demonstrated use of highly manipulated and urban systems.*” This indicates great flexibility on the part of beavers and contradicts the 18 acres requirement.

Investigation into the 18 acres number found the number to be false. It was be a modification of information found in a 2004 Washington State publication (Saldi-Caromile et al., 2004), and had modified information from a 1993 journal article (Vore, 1993), which had significantly modified results found in a 1956 Master’s thesis out of Colorado School of Mines (MacDonald, 1956).

RESULT: ODFW no longer cites the 18 acres requirement. It is not a requirement for successful beaver establishment and continued presence in an area.

EXISTING ODFW CLOSURES RELATED

ODFW: “No anecdotal nor empirical information indicate that any of the 16 ODFW closures have directly or indirectly benefited beaver nor increased beaver modified habitats in those areas.” (ODFW 2026, Exhibit C-3, p. 9).

RESPONSE: This is incorrect. Information exists for two ODFW area closures (see next slide for locations) and they both show major change.

Bridge Creek closure in Wheeler County (Deemer and Beschta, 2008; Weber et al., 2017). Large increase in beaver dams, riparian habitat, and surface water occurred.

Ochoco NF closure in Wheeler, Crook, and Grant Counties (1997 and 2020 letters from the Forest to ODFW)

In 1997 in a letter to ODFW, the Forest requested a continuation of the moratorium on beaver trapping in place and identified by name seven streams as examples that were being restored by beavers and specific changes:

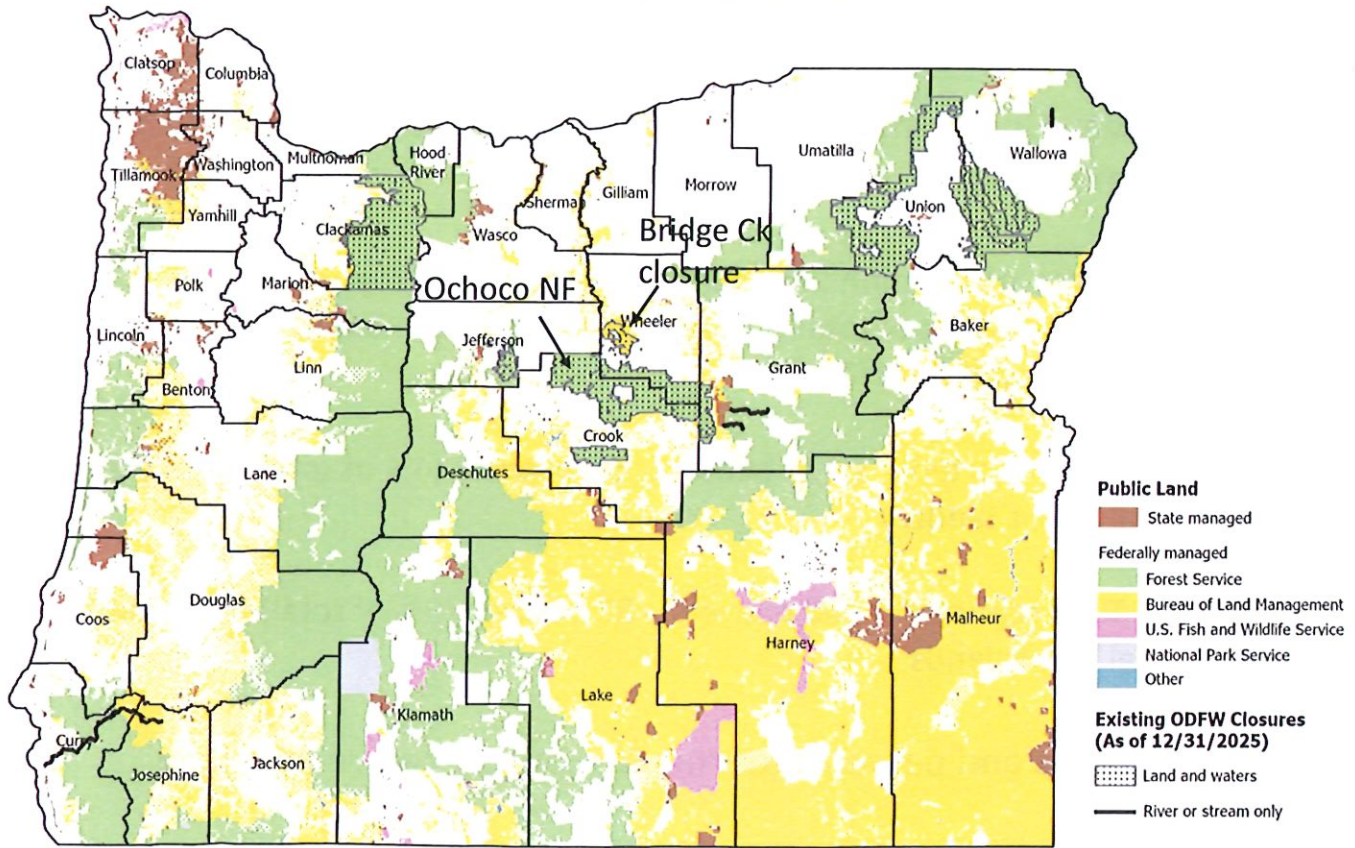
“These area have had sustained increases in the number of pools, sediment retention, number of neotropical bird species, and amount of amphibian habitat – especially for spotted frogs, tree frogs, and longtoed salamanders. Rearing habitat for redband trough has increased dramatically as well.”

The 2020 letter from the Ochoco National Forest states that the reasons for the closure have not changed and improvements continue.

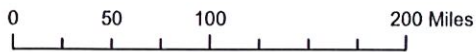
To my knowledge, no other data exist or been published related to changes due to the closure for the other areas. Four, however, have limited potential (Rogue River, Peavine Creek, Murderers Creek, Deer Creek). Only the main stream is closed. Tributaries and public land (forage base) remain open to trapping and hunting.

NO DATA = UNKNOWN, NOT NO RESPONSE.

Location of the two ODFW closures with information showing expansion of beaver-created habitat.



Map Credit: Suzanne Fouty and Steven Jett



Funding for the Watershed Boundary Dataset (WBD) was provided by the USDA NRCS, USGS and EPA along with other federal, state and local agencies. Representatives from many agencies contributed a substantial amount of time and salary towards quality review and updating of the dataset in order to meet the WBD Standards. Acknowledgment of the originating agencies would be appreciated in products derived from these data. See dataset specific metadata for further information. U.S. Geological Survey (USGS) Gap Analysis Project (GAP), 2022, Protected Areas Database of the United States (PAD-US) 3.0: U.S. Geological Survey data release, <https://doi.org/10.5066/P9QCPLQ4B>

NUMBERS KILLED ON PUBLIC LANDS RELATED

ODFW perspective: Only a small percent of the total beavers trapped and shot come from public lands.

ODFW's 2026 Furbearer Information Summary and Regulation Proposals provides the following numbers and percent of total reported that came from federal and state public lands for 2023/24 and 2024/2025:

- 2023/24: Total reported = 1,439 beavers. 59 beavers (4% of total) from state and federal public lands.
- 2024/25: Total reported = 960 beavers. 87 beavers (9% of total) from state and federal public lands.

RESPONSE: Numbers and percentages require context before assigning meaning.

CONTEXT FOR NUMBERS KILLED ON PUBLIC LANDS

1. It is the % removed from a given area that matters, not % of total reported to ODFW. Two examples provide a larger context for the numbers:
 - Scenario 1: Two beavers are removed from a 100 mile² watershed. These were the only two in the watershed. They were the first in a long time to arrive and are a breeding pair. Two seems small until you realize that a 100% have been removed and the watershed again lacks beavers and therefore the development of dams, ponds, and wetlands. Expansion has been stalled in this watershed, potentially for a long time.
 - Scenario 2: Two colonies exist in a 100 mile² watershed. One is removed from each colony and each is part of the breeding pair. No kits may be born that year in either colony depending on if the female was killed or when the male beaver were trapped or shot. Population growth slows and will require the arrival of a new mate.
2. Habitat suitable for dam building is not uniformly distributed on public lands. All rivers and streams are travel corridors, but only some areas meet the requirements for dam building. Trappers and hunters focus their energy in these places. Therefore, there is repeated removal from areas which limits population expansion.

CONCLUSION: The abundance of unoccupied suitable habitat on public lands indicates that populations are low making any removal at this time significant because these are source populations for other areas.

REPORTED “HARVEST” RELATED

ODFW: “Trapper (and all) harvest is not the result of a decline in beaver numbers, but a decline in the number of trappers.” (Melcher, 2020)

RESPONSE:

1. Trapper harvest has declined. Correct.
 - In 1951/52 season, 15,257 beavers were reported trapped (Kebbe, 1960). In 2024/2025 season, 960 beavers were reported trapped or shot (ODFW 2026).
2. Numbers of trappers has declined. Correct.
 - 1951/1952 season. Beaver trappers = 2270 individuals (Kebbe, 1960).
 - 2003/2004 season. Beaver trappers = 236 individuals (ODFW 2026)
 - 2024/2025 season. Beaver trappers = 131 individuals (ODFW 2026).

However, the conclusion that there has not been a decline in beaver populations cannot be determined from this information because the population and distributions of beavers in Oregon is unknown.

WHY ARE BEAVER POPULATIONS AND DISTRIBUTIONS UNKNOWN?

Two major reasons:

1. ODFW does not census beaver populations and distributions. ODFW only knows number of dead beavers reported by trappers and hunters under the furbearer regulations and those reported by USDA Wildlife Services.
2. Trappers and hunters do not provide GPS locations of where they killed beavers. Until 2022 they only reported by county. The reporting form now ask for more details such as land ownership, water feature, and the HUC 8. However, county sizes and HUC 8 sizes are large and the scale too coarse for quality data analysis. County sizes range from 435 to 10,135 miles² and HUC 8 (subbasins) range from 9 to 4,134 miles².

In addition, identifying locations of beaver take is further complicated by the fact that on the *furbearer reporting form*, under the column labeled “**Land Ownership**”, there is the category titled “**Navigable River/Open Water**” which is a water feature and provides no ownership information. In 2022, 32% of total (339 beavers) were placed into this category, in 2023, 40% (575 beavers) were placed into this category, and in 2024, 32% (308 beavers) was in this category.

SO, WHAT DO WE KNOW?

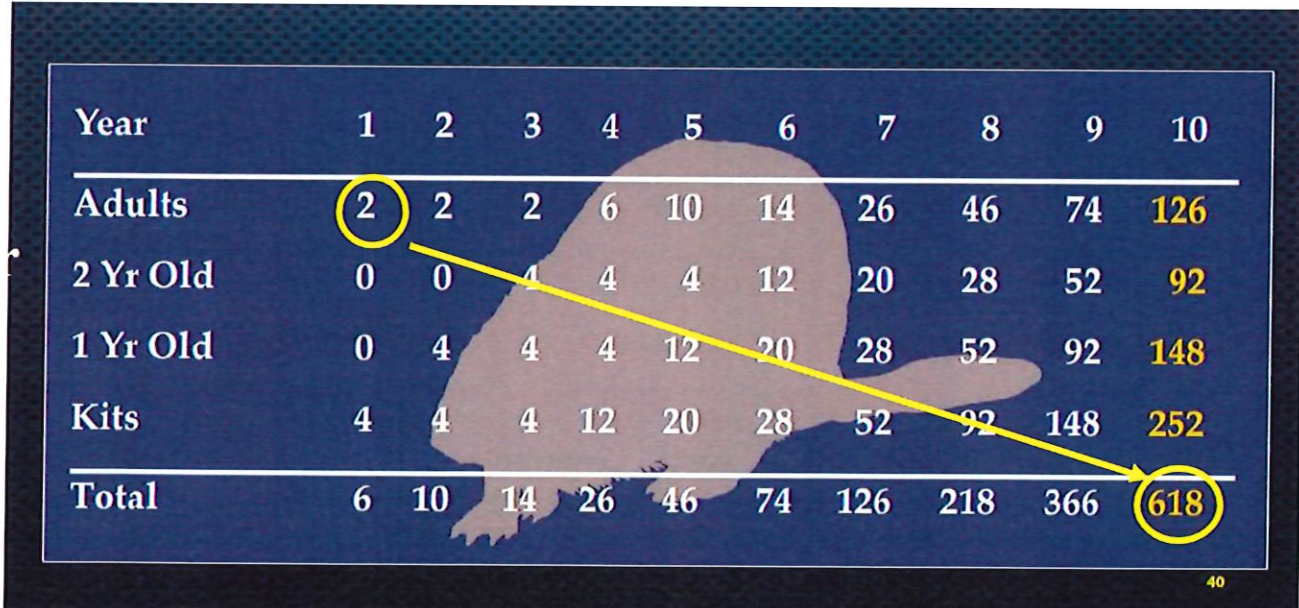
In the absence of beaver population census and actual locations of beavers trapped and shot, we must look to other factors to provide information on the relative abundance of beavers and likely response to persistent trapping and hunting.

1. Impact of mortality on population growth.
2. Persistence and intensity of trapping since 1951.
3. Presence of habitat suitable for beavers and beaver-dam building activity on public lands.
4. Response of populations to area closures when closure areas have the appropriate characteristics.



1. BEAVER MORTALITY, REGARDLESS OF METHOD, INFLUENCES POPULATION GROWTH

The more effective the mortality method, the greater the influence on future population growth. Trapping is a highly effective mortality cause. Unlike hunting, which requires the individual to be present, a trapper can set multiple traps in an area and they remain on the landscape 24/7 until the trapper returns and removes them. As beaver are selective in where they build their dams, so too are trappers and hunters on where they focus their energy. The example in the ODFW slide shows the hypothetical population growth from beaver pair. The removal of the pair in the first year prevents significant population growth.

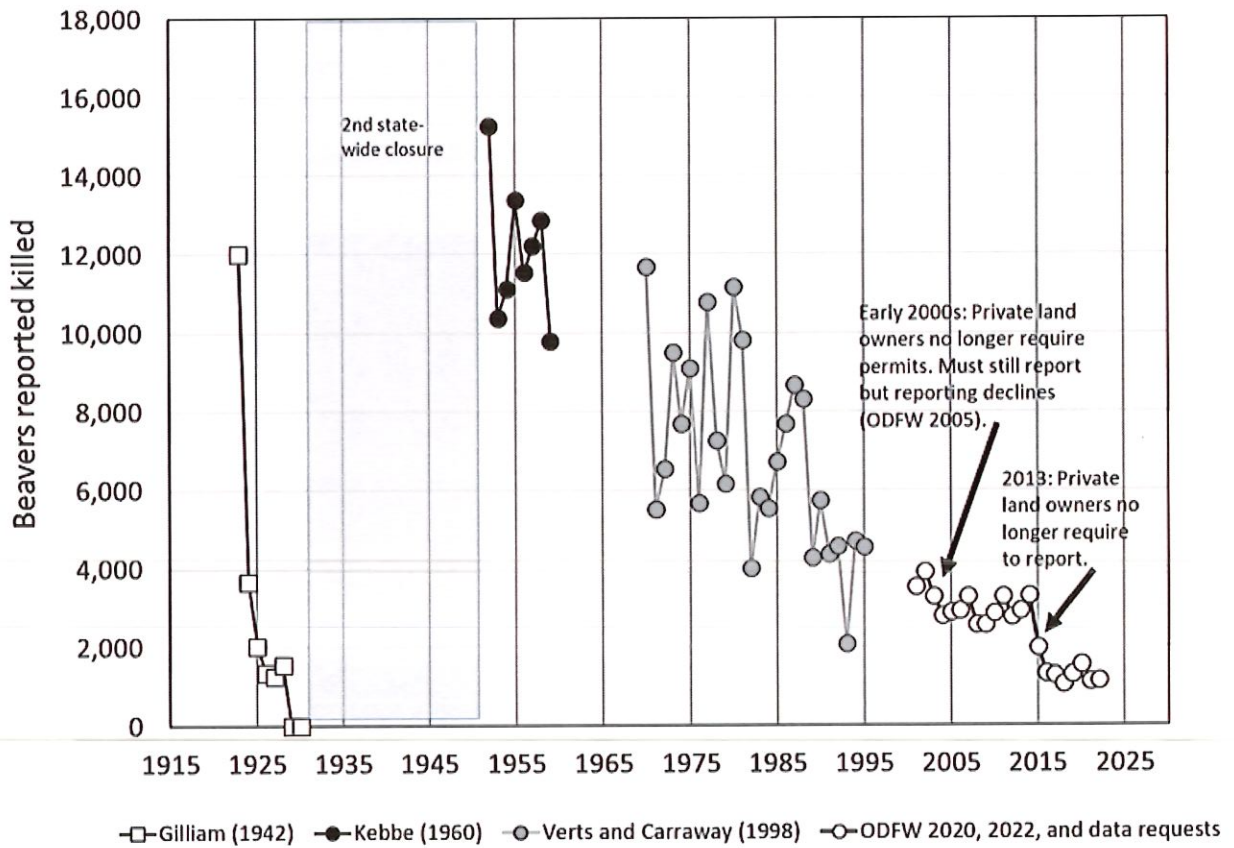


Year	1	2	3	4	5	6	7	8	9	10
Adults	2	2	2	6	10	14	26	46	74	126
2 Yr Old	0	0	4	4	4	12	20	28	52	92
1 Yr Old	0	4	4	4	12	20	28	52	92	148
Kits	4	4	4	12	20	28	52	92	148	252
Total	6	10	14	26	46	74	126	218	366	618

40

2. TRAPPING HAS BEEN A YEARLY, HIGH INTENSITY ACTIVITY SINCE 1951 (76 yrs).

There are no limits of how many beavers can be removed from an area unless a closure where removal is zero. The season is Nov 15 to March 15, and includes when beavers are foraging on land and the breeding and pregnancy season.



3. UNOCCUPIED SUITABLE HABITAT PRESENT ON PUBLIC LANDS

In eastern Oregon in 2018, the North Fork Burnt River (NFBR) watershed (194 miles²) had the maximum potential number of beaver dams under existing conditions estimated using the Beaver Restoration Assessment Tool (BRAT). The model predicted 7,019 dams (Macfarlane et al., 2019a). Assuming only 25% were built and persisted, to conservatively account for errors in GIS layers and model assumptions, there should be 1,755 dams. The 2018 field surveys and Google Earth analysis found only 53 or 3% of the adjusted potential and 47 in 2023.

In central Oregon in 2018, the John Day River Basin (8,100 miles²) also had the maximum potential number of beaver dams under existing conditions estimated using BRAT. The model predicted 120,945 dams (Macfarlane et al., 2019b). Assuming only 25% were built and persisted, there should be 30,236 dams. Only 293 were found or 1% of the adjusted potential.

In western Oregon, ODFW Aquatic Habitat Inventory data for 17 reaches in the Coast Range with multiple interannual replicates were examined for conditions (Niemi et al., 2020). The average stream reach length was 0.5 miles. The maximum number of dams and pond surface area within each reach was compared to their most recent dam numbers and pond surface area and numbers summed. Total beaver dams dropped from 152¹ to 19 or 87.5% reduction. Total maximum pond area for the 17 stream reaches decreased from 105 acres to 8.6 acres, a 92% reduction.

¹ Niemi et al. (2020). Table S3.1 lists maximum dam numbers as 155 but the correct number is 152.

4. POPULATIONS INCREASE INSIDE EFFECTIVE TRAPPING CLOSURES

An effective closure has the following characteristics

1. No beaver trapping or hunting occurs in the closure area.
2. Closure area of sufficient size to include a connected networks of streams systems or water bodies that allow for safe dispersal, expansion, and settlement.
3. Land (foraging base) and all waters (i.e. rivers, streams, lakes, reservoirs, ponds, estuaries) are closed to beaver trapping and hunting.
4. Area has unoccupied habitat suitable for beavers and dam building. Habitat will be of varying quality and abundance. Optimal conditions are not required.
5. There are existing beavers (source populations) in the area or within accessible proximity that can disperse into the closure.

If one of these characteristics is missing, then the closure is unlikely to be successful.

OREGON (98,438 miles²)

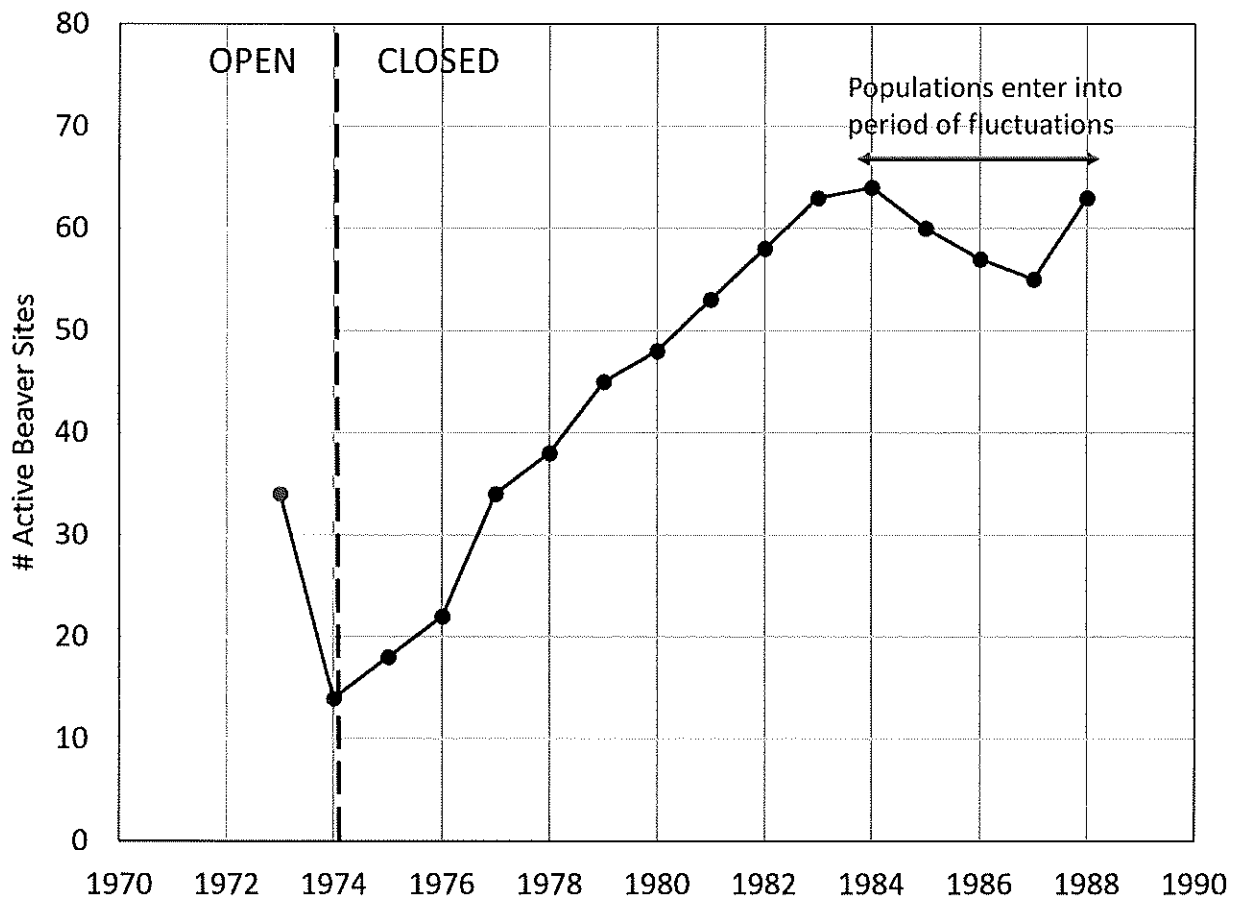
Oregon has had two state-wide beaver trapping and hunting closures. The closures were initiated by the state legislature in response to water resource needs.

The first closure was 1899-1916. In 1917 counties began to be reopened in response to increased complaints on private lands. By 1923 all but five SW counties and National Forests were open to trapping (Gilliam, 1942). Trapping pressure was high and beaver populations rapidly declined.

A second closure went into effect from 1931 to 1950. Population growth again increased and is reflected in the increased number of complaints removed from complaint areas. In 1942 only 656 beavers were removed but by 1944 >2000 were removed. Between 1945 and 1950 the number of beavers removed by state trappers increased from 3000 to 6000.

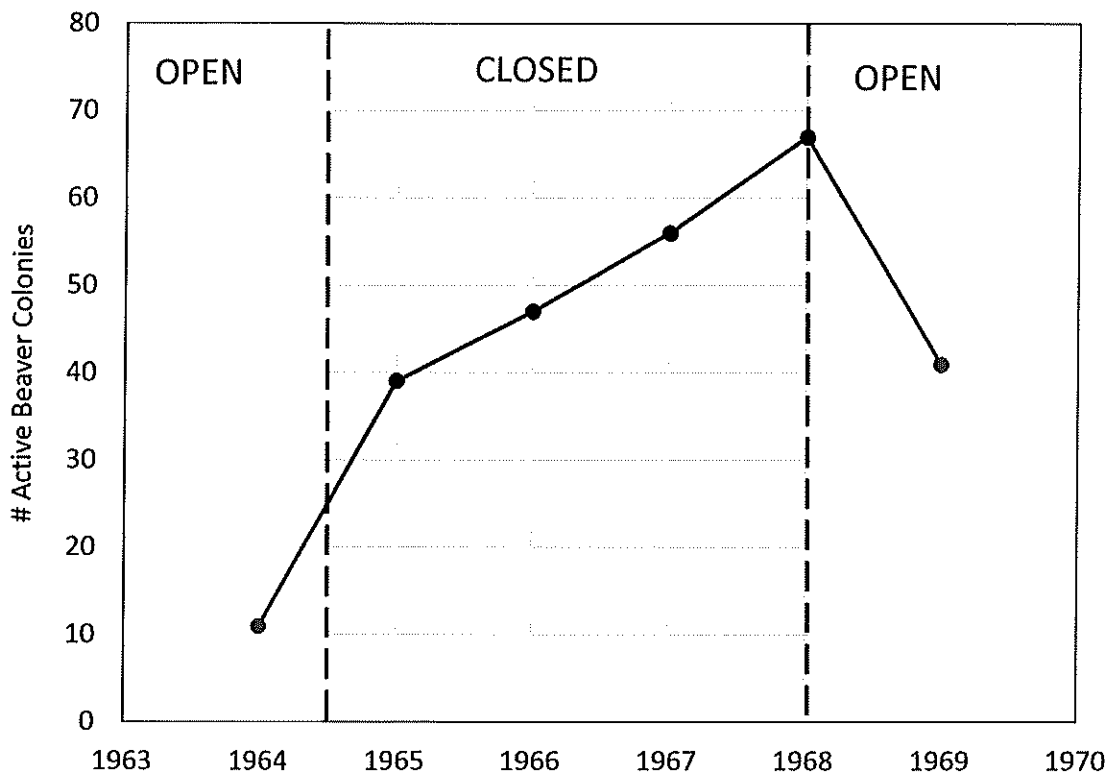
In 1951 all but national forests were reopened (Kebbes, 1960). Some time after 1959, national forests were reopened.

ALLEGANY STATE PARK, NEW YORK (96.5 miles²).



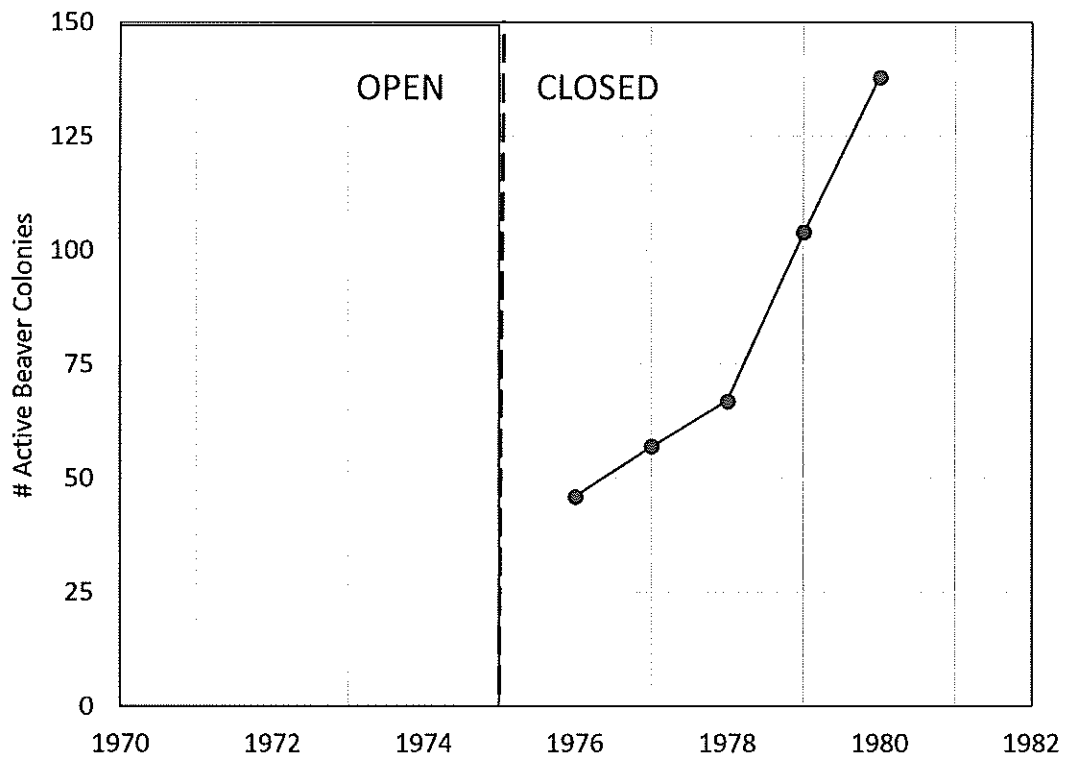
Changes in number of active colonies following park closure. Occupancy of suitable habitat at time of closure <<30%. Source: Schulte, 1993

WARREN COUNTY (eastern ½) , NEW YORK (443.6 miles²).



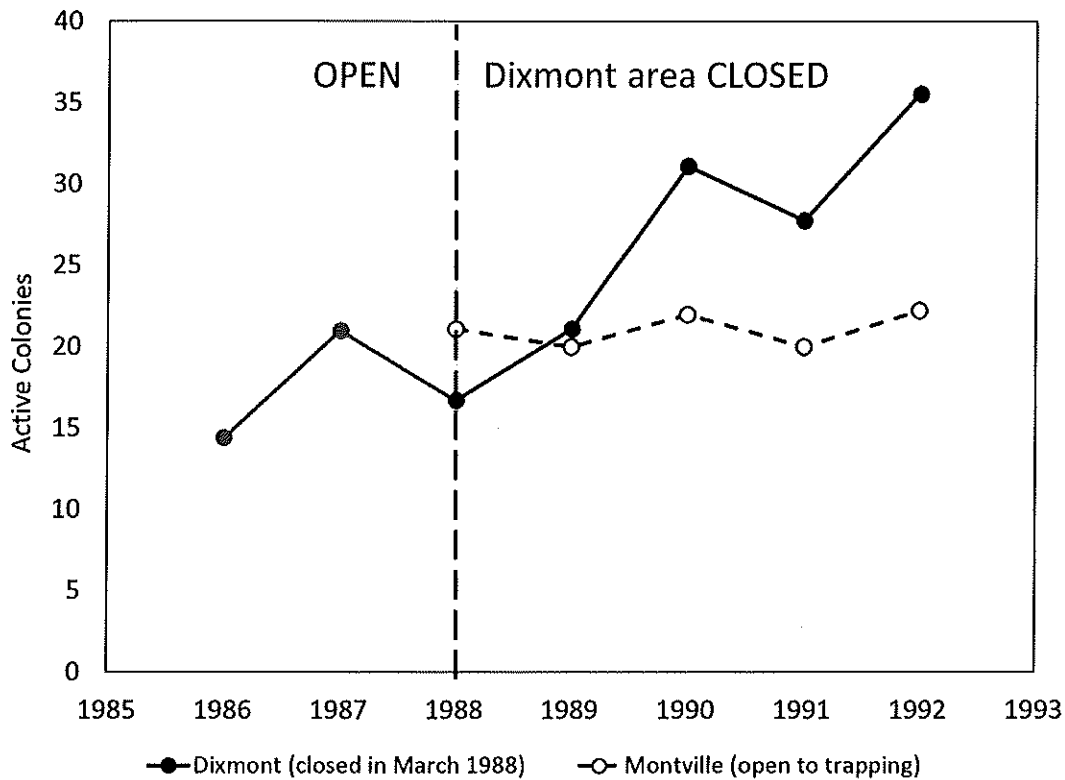
Changes in number of active colonies following area closure and then reopening. Occupancy of suitable habitat at start of closure = 4% and was >21% in last year closed (1968). Area opened for 1 month in 1969. 75% of the active colonies were trapped, often by more than one trapper. Percent occupancy decreased from >21% to 15%. Source: Parsons, 1975₂₅

ALLEGANY COUNTY (northern ½), NEW YORK (510 miles²).



Changes in active colony numbers following area closure. Occupancy of suitable habitat was 12% in winter 1975/1976 when first closed and 36% by winter 1979/1980. *Source: Ermer, 1984.*

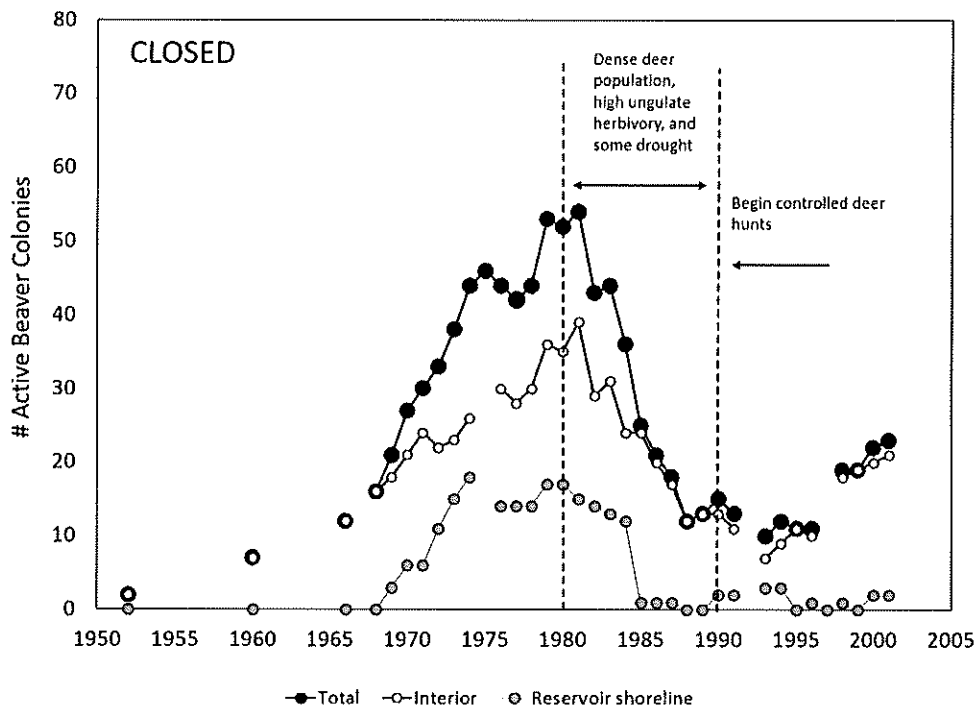
DIXMONT AND MONTVILLE study areas, MAINE (42.9 miles² each).



Paired study. Dixmont area (closed to trapping) and Montville area (open to trapping). Changes in active colonies following Dixmont area closure. During the study period, numbers trapped in the Montville area decreased from 39 beavers in 1989 to 10 in 1991 to 17 in 1992. Decrease appears related to a decline in pelt prices. Colony densities in the Dixmont area increased (0.15 to 0.32 colonies/km²) but showed little change in the Montville area (0.19 to 0.20 km²). Source: McCall et al., 1996

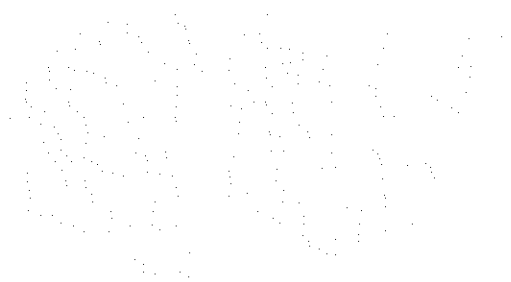
PRESCOTT PENINSULA, MASSACHUSETTS (19.3 miles²).

Study area falls within the larger closure area of the Quabbin Reservation (168 miles²).



Changes in number of active colonies following natural recolonization in 1952 by 2 colonies. Area closed to trapping and hunting from the beginning. Area has an abundance of habitat in the form of large and small rivers, lakes, and a reservoir. Initial occupancy of suitable habitat was 0% (Busher and Lyons, 1999).

EXAMINATION OF OTHER STATEMENTS RELATED TO
BEAVER TRAPPING AND HUNTING



ARE THERE RESTRICTIONS ON PUBLIC LANDS AND WATERS WHEN BEAVER TRAPPING AND HUNTING?

The sole restriction on public lands in Oregon is the season (Nov 15 to March 15). The breeding and pregnancy period occur during this time.

- **There are no limits to the number of beavers an individual kill.** It is legal to remove all beavers from a given watershed. If dams fail and habitat and water resources are lost due to their removal, the trapper or hunter is not held responsible for financial costs incurred by impacted local or downstream users.
- **Trapping and hunting are non-selective.** Unlike hunting elk and deer, there is no way to know if what is about to be trapped or shot is female, male, one of the breeding pair, a pregnant female, a 2-year old about to disperse.
- **There are no limits to the number of that traps can be set in an area.** Traps remain on the landscape 24/7 until the trapper returns and removes them. Traps are indiscriminate in what they catch. Bycatch (some species other than beavers) is common including otters, dogs, birds).



IS TRAPPING ALLOWED IN CRITICAL COHO HABITAT IN COASTAL STREAMS?

ODFW: “... a successful voluntary program has been in place since 1997 to discourage the trapping of beavers in critical Coho habitat in coastal streams, including USDA Wildlife Service agents working on private and public lands. (ODFW Director Curt Melcher in a letter to Oregon State Representative Brad Witt dated June 4, 2020. p.2)”

CORRECTION: The statement is incorrect. Trapping is allowed in critical coho habitat in coastal streams. All ODFW has asked is that coastal trappers voluntarily protect beaver dams, not beavers (see below). This is not a trivial difference. Without beavers maintaining dams, the dams fail, ponds drain, and critical Coho habitat is lost.

Attention Coastal Beaver Trappers: ODFW requests your continued cooperation in protecting beaver dams in coastal areas important to coho salmon rearing. If you are not familiar with this program, which was initiated in 1998, please contact your local ODFW biologist.

Source: Oregon Furbearer Trapping and Hunting Regulations, July 1, 2022 through June 30, 2024

WHAT IS THE CONTRIBUTION OF WILD CARNIVORE PREDATION ON BEAVER POPULATIONS? HOW DOES IT COMPARE TO BEAVER TRAPPING AND HUNTING?

Wild carnivores like cougars and wolves do kill beavers. They are similar to the human hunter. They must be physically present to do the kill, and a single animal is taken at a time. For wild carnivores often it is an opportunistic encounter, often occurring when beavers are dispersing. However, wolves are known to stake out a beaver pond.

Trapping does not require the trapper to be present. Multiple traps can be set in multiple places within a stream system and they remain on the landscape 24/7 until removed by the trapper. This makes trapping far more effective than either human or wild carnivore hunting.

In areas where populations of both beavers and wolves are high, the effect of wolf predation on population is negligible (Gable et al. 2023)

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BORISCH Roxann B * ODFW

From: Roxann.B.BORISCH@odfw.oregon.gov
Subject: FW: Advanced Notice RE: Request to Expand Oregon Beaver Trapping and Hunting Regulations to all public lands and waters
Attachments: Public Land Closures Map.pdf; Drought map_2026.pdf; Drought maps_ 2022_2025.pdf

----- Forwarded message -----

From: **Suzanne Fouty** <suzannefouty2004@gmail.com>
Date: Sun, Jun 21, 2026 at 12:01 PM
Subject: Advanced Notice RE: Request to Expand Oregon Beaver Trapping and Hunting Regulations to all public lands and waters
To: Mary Wahl <maryodfw@gmail.com>
Cc: Suzanne Fouty <suzannefouty2004@gmail.com>

Dear Chair Wahl --

I want to give advance notice to the Commissioners and context as to why I will submit a formal request to expand the beaver trapping and hunting closures to all public lands that are currently under ODFW's jurisdiction by the June 23 deadline. However, I only have some email address for some Commissioners and not sure those are even valid. I would greatly appreciate if you would forward the letter below and its map attachments to the Commissioners.

Thank you.

Suzanne Fouty, PhD
Hydrologist/Soils Specialist
retired USDA Forest Service

Dear Chair Wahl and Commissioners Defrees, Labhart, Spelbrink, Hatfield-Hyde, Moldal, and Morrison,

Oregon is in its seventh year of drought and risk of wildfires is high. Conditions as they apply to water resources and fish and wildlife continue to degrade, compromising the health and well-being of our human and wild communities. Given the situation I am requesting that the beaver trapping and hunting closures on public lands be expanded beyond the ODFW staff recommendations, to a closure of all remaining public lands and waters not closed under HB 3932 or an existing ODFW closure.

Our ODFW staff have worked hard to interpret the HB 3932 criteria and create the complex maps it requires. They recognize the fragmented nature of the closures and thus the law's limits when it comes to addressing the habitat needs of salmon and many Oregon Conservation Strategy Species. This awareness of the law's limitations is reflected in the broad Rule Summary language found in the *Notice of Rule Summary Making* submitted to the Oregon Secretary of State on April 30, 2026 (p.8 and below). The language has been written to explicitly give you, the Commissioners, maximum flexibility when making decisions in 2026 related to the furbearer regulations. Note the part below in RED.

AMEND: 635-050-0045

RULE SUMMARY: These amended rules are related to furbearer harvest, bag limits, area closures, reporting, residency and transaction of pelts for the 2026-2027 and 2027-2028 furbearer harvest and pursuit seasons. Notable proposals amend rules regarding beaver harvest on public lands. **The Commission may decide to adopt staff recommended proposed rule and rule amendments as proposed in the attachment, or the Commission may decide to modify the proposed rules or not adopt some or any of the proposed rule amendments.**

Flexibility in the decision-making space creates options. Below are two motions. Each motion sets beavers and Oregon on a different path.

The text in the first motion is the ODFW Draft motion as presented in Exhibit C – Attachment 1, prepared for the June Commission meeting. This motion is limited to addressing the requirements of HB 3932 which results in a patchwork of closures. This patchwork fails to account for the fact that beavers and water move great distances, that stream systems are connected, and that water, fire, and habitat concerns are state-wide.

ODFW DRAFT MOTION: I move to approve staff proposals as shown in Attachment 3 and amend Oregon Administrative Rule Chapter 635, Division 050 as proposed by staff and shown in Attachment 4, to set regulations and seasons for the harvest and pursuit of furbearing mammals.

The text in second motion expands the closure to all public lands and waters under ODFW's jurisdiction. It too meets the requirements of HB 3932 but does additional work. It corrects the patchwork of closures and thus the ecological weakness of HB 3932 and existing ODFW closures by creating a closure that accounts for the fact that beavers and water move great distances, that stream systems are connected, and that water, fire, and habitat concerns are state-wide. It also simplifies ODFW administration and decreases the expenditure of staff resources because closure maps are now existing public land maps. Finally, it ensures that ODFW retains flexibility on all public lands not closed by HB 3932 as it pertains to future beaver trapping and hunting on public lands.

RECOMMENDED MOTION: I move to approve staff proposals as shown in Attachment 3 and amend Oregon Administrative Rule Chapter 635, Division 050 as proposed by staff and shown in Attachment 4, to set regulations and seasons for the harvest and pursuit of furbearing mammals, **except that Section 635-50-0070 would be modified to read as follows:**

“All public lands and the waters that reside on them, flow through them, or have one side bounded by public lands and not currently closed under HB 3932, are hereby closed. All existing ODFW closures are hereby incorporated into this closure.”

In preparation for this request, I reached out to individuals within the Oregon Hunters Association and Trappers Association, and thus they are aware this request is coming forward. I was hopeful that these organizations would now support this ask given ongoing drought conditions and habitat needs. They are not there yet, but what I have learned is that they, as do you, place a great deal of weight on information provided by ODFW staff. Unfortunately, some of it is incorrect or does not include other relevant information.

Having worked for the Forest Service as a water resource and soil specialist for 16 years I appreciate the limits of what ODFW staff can research given their work loads. Therefore, in addition to my formal request, I will be submitting two PowerPoint pdf documents: 1) one which examines HB 3932, why it is

insufficient, your flexibility in decision making, and recommendations, and 2) one which addresses points frequently raised in opposition to a full closure (i.e. closure effectiveness, habitat availability, take numbers off public lands, wild predation contributions). The second will acknowledge the perspective of "custom and culture" but focus on the science. My goal is to fill in information gaps for you, our ODFW staff, and the public. They will provide you the solid foundation on which you can vote to expand the beaver trapping and hunting closures to all public lands and waters under ODFW's jurisdiction.

Three maps are attached to give visual context to the request: 1) current drought conditions, 2) drought conditions in 2020 to 2025 for late July, and 3) existing ODFW and HB 3932 closures. On the existing closure map, ORANGE indicates public lands and waters still under ODFW's jurisdiction as it pertains to beavers. Please note that southeast and parts of southern Oregon, some of the driest parts of our state, received minimal closures under HB 3932 despite the abundance of public lands. This is because those who prepared the closure criteria section in HB 3932 tied closures to the presence of impaired water quality. However, the amount of water quality data is limited. Collection varied as a function of agency, staffing, and priorities. Given limited resources, the locations of water quality monitoring sites were selected to give a broad understanding of conditions as they pertained to fisheries, drinking water, and land management. Collection had nothing to do with beavers. Thus, water quality data tell us nothing about whether habitat suitable for beaver dam building is present yet it is dams that lead to the development of desired benefits. Areas with impaired water quality may have no suitable habitat while areas with no data, insufficient data, or good water quality may have an abundance.

Habitat suitable for beaver dam building and habitat creation does not exist uniformly across our public lands. Beavers find the habitat that works and identify their presence with dams, ponds, lodges, bank dens, and biological reefs. It is these places that trappers and hunters seek out and return to, creating conditions of repeated removal which limits population growth and dispersal. Thus, while numbers reported taken from state and federal public lands may seem low, the impact on future water resources and habitat expansion is high. Effective closures must reflect the behavior of the animal in order to achieve desired outcomes. The patchwork of HB 3932 and ODFW closures does not reflect beaver behavior.

Since 2020, when the first public lands and waters closure request was made, you have become increasingly knowledgeable about the contributions beaver make. You have experienced, like the rest of us, the impact of wildfires, drought, and loss of fish, wildlife, and livestock. I encourage you to remember these past impacts and your emotional response, and to place Oregonians and fish and wildlife and their current and future needs at the center of your decision.

There may be suggestions to do more studies, have more meetings, more beaver management work groups, more action plans, or to take a wait and see approach to HB 3932 closures. However, when the science, the economics, and existing conditions clearly urge action, and they do in this case, these are delay tactics. They are used because the decision feels hard, but you want to look like you are doing something, that you are being thoughtful. The Forest Service, my past agency, is a master at taking this approach so the tactic is very familiar. And who among us has not procrastinated at taking an action we know is necessary but feels difficult at the time until actually done?

ODFW staff, in their construction of the Rule Summary language, have given you tremendous decision-making flexibility. The language also provides incentive to take bold action. It makes clear to the public that it is you, not ODFW staff, not user groups, not state legislators, who are responsible for whether our future includes large-scale improvements in fish and wildlife habitat and water resources dependent on beaver-created habitat, or their continued and accelerated declines. The combination of flexibility and incentive has given you all an extraordinary opportunity to be the ones who set in motion initially

slow but steady, and then accelerated expansion of much needed fish and wildlife habitat and natural water storage on public lands.

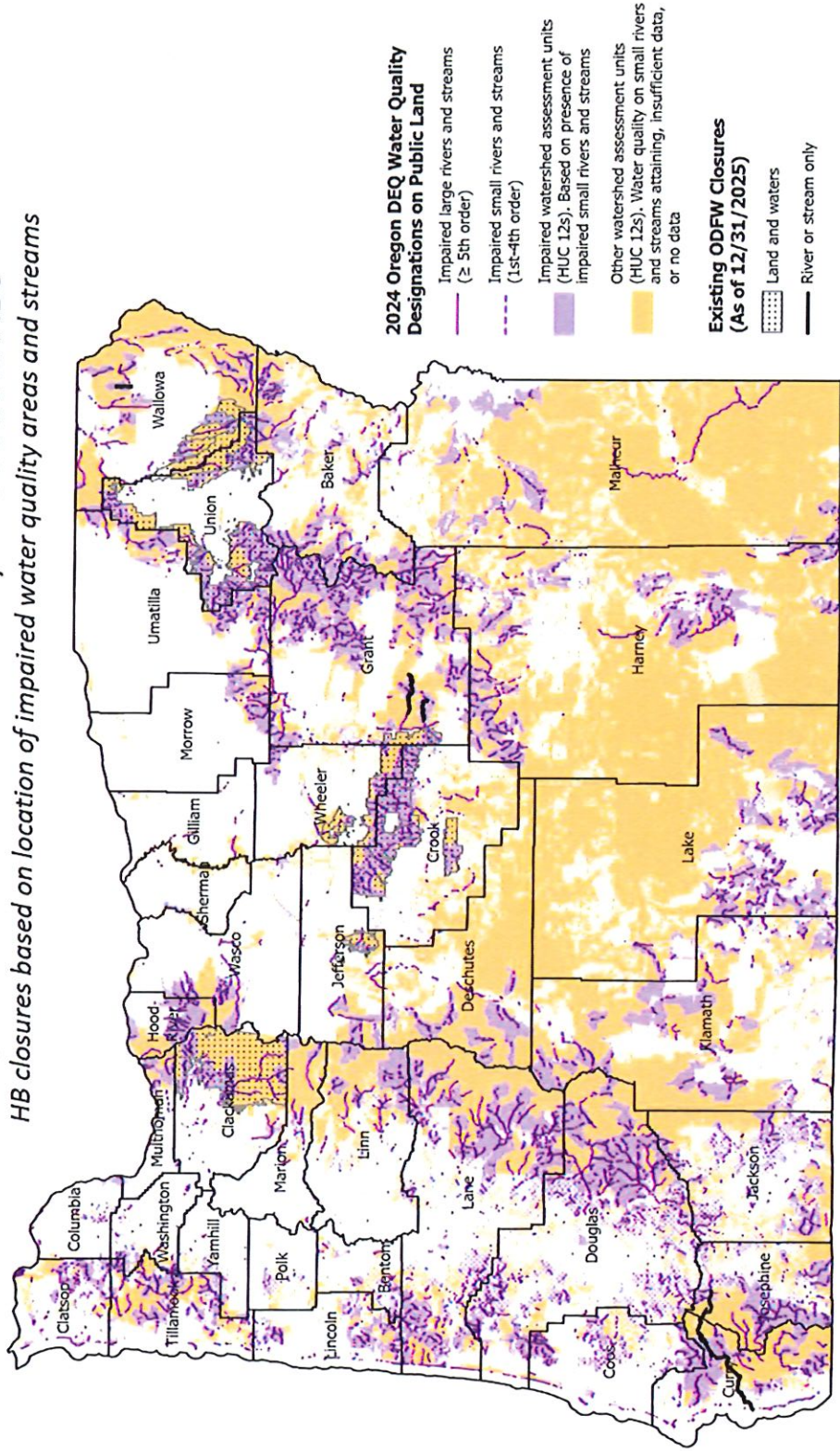
If you have questions, please feel free to reach out. I will also be present at the meeting and welcome any questions from the Commission at that time as well.

All the best.

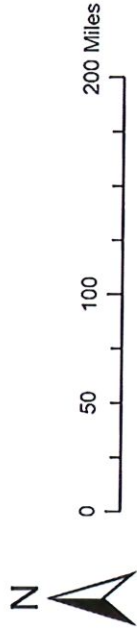
Suzanne Fouty, PhD
Hydrologist/Soils Specialist
retired USDA Forest Service

EXISTING ODFW CLOSURES (STIPPLED AREAS) AND HB 3932 CLOSURE AREAS (PURPLE POLYGONS AND LINES) ON PUBLIC LANDS

HB closures based on location of impaired water quality areas and streams



Map Credit: Suzanne Fouty and Steven Jett



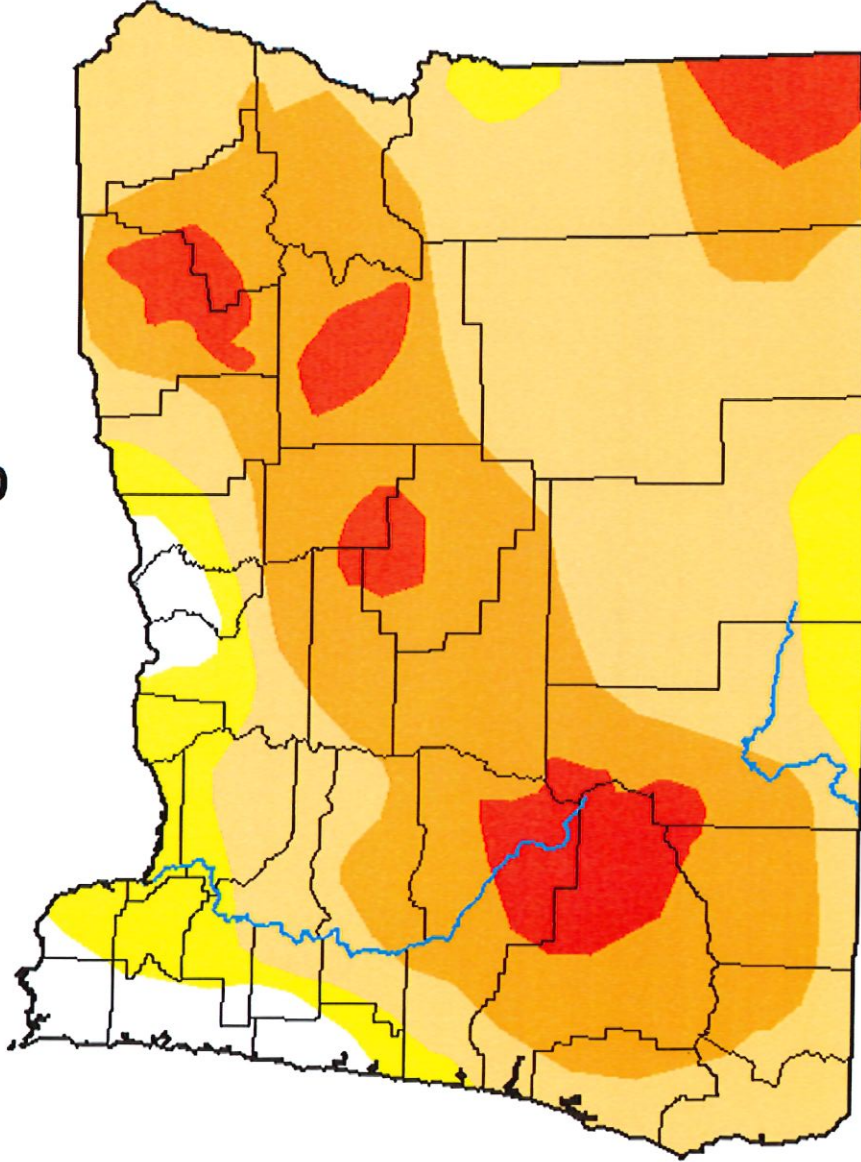
Funding for the Watershed Boundary Dataset (WBD) was provided by the USDA-NRCS, USGS and EPA along with other federal, state and local agencies. Representatives from many agencies contributed a substantial amount of time and salary towards quality review and updating of the dataset in order to meet the WBD Standards. Acknowledgment of the originating agencies would be appreciated in products derived from this dataset. See dataset specific metadata for further information. U.S. Geological Survey (USGS) Gap Analysis Project (GAP), 2022. Protected Areas Database of the United States (PAD-US) 3.0; U.S. Geological Survey release, <https://data.org/10.5066/959Q9L048>

U.S. Drought Monitor Oregon

June 16, 2026

(Released Thursday, Jun. 18, 2026)

Valid 8 a.m. EDT



Drought Conditions (Percent Area)

	None	D0-D4	D1-D4	D2-D4	D3-D4	D4
Current	4.21	95.79	86.19	44.16	9.24	0.00
Last Week 06-09-2025	4.21	95.79	84.10	44.16	9.24	0.00
3 Months Ago 03-17-2025	22.14	77.86	41.16	6.20	0.00	0.00
Start of Calendar Year 01-06-2025	65.06	34.94	15.76	4.65	0.00	0.00
Start of Water Year 09-30-2025	32.92	67.08	47.65	24.35	1.39	0.00
One Year Ago 06-17-2025	34.61	65.39	35.77	3.62	0.00	0.00

Intensity:

- None
- D0 Abnormally Dry
- D1 Moderate Drought
- D2 Severe Drought
- D3 Extreme Drought
- D4 Exceptional Drought

The Drought Monitor focuses on broad-scale conditions. Local conditions may vary. For more information on the Drought Monitor, go to <https://droughtmonitor.unl.edu/About.aspx>

Author:

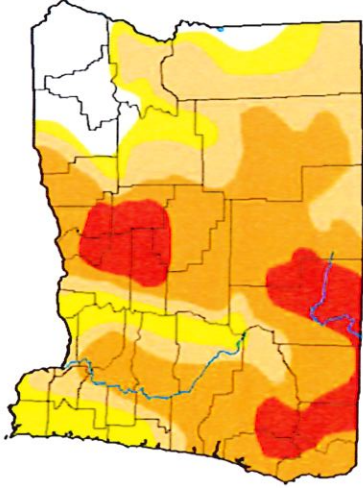
Brian Fuchs
National Drought Mitigation Center



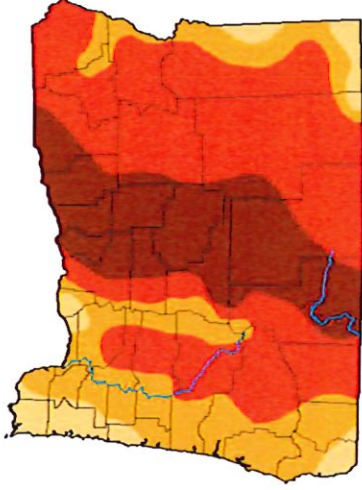
droughtmonitor.unl.edu

OREGON'S MULTI-YEAR DROUGHTS

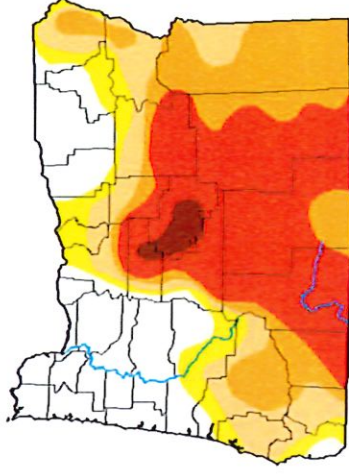
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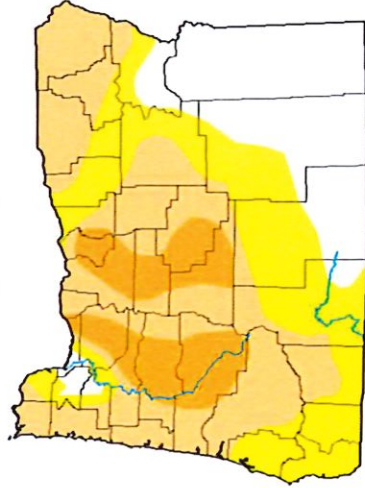
July 27, 2021



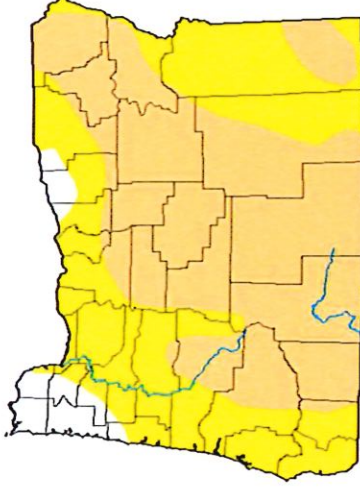
July 26, 2022



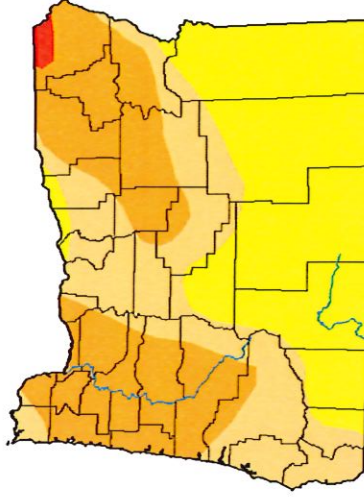
July 25, 2023



July 30, 2024



July 29, 2025



BORISCH Roxann B * ODFW

From: Roxann.B.BORISCH@odfw.oregon.gov
Subject: FW: Trapping

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

From: Keith Stephens <trapperman556@gmail.com>
Sent: Sunday, June 21, 2026 8:13 PM
To: ODFW Commission * ODFW <ODFW.Commission@odfw.oregon.gov>
Subject: Trapping

[You don't often get email from trapperman556@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Here we go again pecking away at the Oregon trappers and their trapping rights, you guys have said yourself that trapping has no affect on the beaver population so I'm assuming it doesn't affect the otter population as well, have you forgotten that this country was founded by trapping and the fur trade, us as trappers do more for the furbearers and predators alike than you ever will, I've lived in Oregon for pertnear 60 years I've been a hunter, trapper, fisherman and outdoorsman my entire life and I have watched most of it decline, you have it set up where you'll die before you ever draw a decent tag in this state, the fishing is damn sure nothing to write home about, you make it impossible to make a little money trapping but us as trappers don't do it for the money we do it because we're trappers it's a way of life and we love it so can you please leave things alone, the beavers, otters, martin, bobcats etc seem to be doing fine with out you coming up with these hairbrained ideas, we can all see this is just political like it or not, we are so much smarter than the anti movement please don't let them rule the roost, before we know it we will be as bad as California and we're not far from it now God help us, you do realize you are driving sportsmen of all ages out of the once great state of Oregon maybe that's your goal if so great job, so I ask please don't let the uneducated control the future of our hunting and trapping in Oregon, we do a great job of managing and taking care of our wildlife because we care!

Sincerely
Keith Stephens
Sent from my iPhone

BORISCH Roxann B * ODFW

From: Roxann.B.BORISCH@odfw.oregon.gov
Subject: FW: Otter trapping closure

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

From: Case Sutton <casesutton12345@gmail.com>
Sent: Sunday, June 21, 2026 6:11 PM
To: ODFW Commission * ODFW <ODFW.Commission@odfw.oregon.gov>
Subject: Otter trapping closure

[You don't often get email from casesutton12345@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

It was recently brought to my attention that the ODFW in all your glory has decided to make a move to ban/ heavily restrict the trapping of otter on Oregon waterways. I know I speak for a vast number of individuals, and businesses alike when I say that this is a very uneducated and blindsided decision. The fur industry in Oregon is something that has been around for centuries. The Indians back in the day trapped beavers and otters alike and guess what? Their populations continue to stay at a healthy level. Today, if you geniuses decided it's smart to ban otter trapping like you've done so to beaver, what is there to manage their population? They have no natural predators. In my hometown, Roseburg, the Umpqua river had an alarmingly high population of river otter. After trapping for several years on this river for these animals, I have seen no drop in population. I continue to see dozens of otters eating salmon and steelhead as I run up and down the river.

As biologists, you should know, a river otter will eat 15-20% of their body weight each day. This consists of fish, small animals, crawfish, and whatever else they may find. When these already high otter populations go unmanaged, what is to keep them from decimating our ecosystems? Our native salmon populations are already low enough. Muskrat populations are very low now on our rivers. With this ban, you'll continue to see these populations declining. I do believe your job is to make decisions to help manage our wildlife populations.

Now, as an Oregon trapper, and as someone who travels out of state a lot, I must say that it is truly embarrassing to tell others the truth about our state's regulations. Odfw focuses the majority of their regulations upon money and makes decisions to win the public's interest. Last I checked, that's not the purpose of the ODFW.

Anyway, I simply wanted to draw attention to the disgust a large amount of us hunters, fisherman, and trappers have with this decision. Now keep in mind, this was written by a 18 year old trapper who has been trapping otter, beaver, bobcat, and coyote since he was 7. I hope you're happy with your decision to take this resource away from me, and thousands of others alike. I'm very disappointed in how you've been managing our wildlife. A lot of us are.

Case Sutton

Oregon Fisherman, Hunter, Trapper, and Agriculturalist

BORISCH Roxann B * ODFW

From: Roxann.B.BORISCH@odfw.oregon.gov
Subject: FW: Proposed otter trapping regs

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

From: Isaiah Glassley <glassleyisaiah@gmail.com>
Sent: Sunday, June 21, 2026 1:38 PM
To: ODFW Commission * ODFW <ODFW.Commission@odfw.oregon.gov>
Subject: Proposed otter trapping regs

[You don't often get email from glassleyisaiah@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

My name is Isaiah Glassley. I am a licensed Oregon trapper. I think the new proposed band on otter trapping in areas closed to beaver is a political band and not based on science. And for that reason I oppose the regulation change. Thank you and God bless.

Sent from my iPhone

BORISCH Roxann B * ODFW

From: Roxann.B.BORISCH@odfw.oregon.gov
Subject: FW: Otter

From: robby crook <crookrb69@yahoo.com>
Sent: Sunday, June 21, 2026 5:37 AM
To: ODFW Commission * ODFW <ODFW.Commission@odfw.oregon.gov>
Subject: Otter

You don't often get email from crookrb69@yahoo.com. [Learn why this is important](#)

I oppose the proposal to extend HB 3932-style trapping restrictions to river otters.

HB 3932 was passed specifically to address beaver management on impaired waterways because proponents argued that beavers provide unique habitat and water-quality benefits. River otters are a different species with different ecological roles, and the reasoning used to justify beaver protections does not automatically apply to otters. HB 3932 itself was written for beavers, not otters.

River otters are not listed as threatened or endangered in Oregon. ODFW already regulates otter harvest through trapping seasons, licensing requirements, and harvest reporting. Before additional restrictions are imposed, there should be clear scientific evidence demonstrating that current harvest levels are negatively affecting otter populations.

Wildlife management decisions should be based on biological data, population monitoring, and sound science rather than expanding restrictions from one species to another without evidence. Restricting otter trapping on thousands of miles of waterways would reduce opportunity for licensed trappers while providing little or no demonstrated conservation benefit.

I respectfully request that the Commission reject any proposal to extend HB 3932-related closures or restrictions to river otters unless a clear biological need is established through scientific data.

Thank you for your consideration.

Sincerely,

Robby Crook Monroe, Oregon

[Yahoo Mail: Search, Organize, Conquer](#)