



OREGON HUNTERS ASSOCIATION

Protecting Oregon's Wildlife, Habitat and Hunting Heritage

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March 25, 2025

House Committee on Climate, Energy and Environment
Re: HB 3932

Chair Lively, Vice-Chairs Gamba and Levy, Members of the Committee,

The Oregon Hunters Association (OHA) is Oregon's largest state-centric hunter conservation organization, representing over 12,000 sportsmen and women throughout 26 chapters in the state. Our mission is 'to protect Oregon's wildlife, habitat, and hunting heritage' and we strongly support science-based wildlife and habitat management.

While we appreciate the collaborative conversations and open communication we have had with Representative Marsh's office, as well as bill proponents, OHA is regrettably opposed to HB 3932.

Our opposition stems from three areas of concern with the bill and proposed programmatic changes to beaver management and beaver harvest.

Decision Making Authority

The Oregon Department of Fish and Wildlife Commission (Commission) is the appropriate decision making body for management of wildlife. The Commission is appointed by the Governor and confirmed by the Senate, ensuring it's makeup is both well vetted and based in representation of all Oregonians.

The topic of beaver trapping on federal lands has been brought before the Commission three times since 2020. Each time the request has been denied based on lack of science and data showing the need for such a measure. However, this does not mean the Commission has been silent on the topic of beavers, their ecological benefit, or the responsibility of the Oregon Department of Fish & Wildlife (ODFW) to appropriately manage the species.

The Beaver Management Workgroup, a year-long facilitated program which included a broad list of stakeholders and Commission members, yielded a [comprehensive recommendation document for future management decisions](#). Following the workgroup, ODFW developed a [3-year Action Plan for Beaver-Modified Landscapes](#). The agency has been actively working on beaver management with increased staffing capacity and funding through opportunities such as the Private Forest Accords. Action Plan updates have been presented regularly at Commission meetings such as the [comprehensive presentation made in September](#).

In addition to the additional staffing, funding, and stakeholder-inclusive program work, ODFW has included specific highlights for [how beavers will be included in the ongoing revision of the State Wildlife Action Plan](#) (formerly known as the Oregon Conservation Strategy).

Given this history of substantial prioritization of beavers and beaver management by ODFW, it is clear that the Commission is the appropriate entity for decision making on this issue. Through the Commission, stakeholders are continually engaged over the course of rulemaking, allowing for a more robust conversation and the time needed for Commissioners to engage with staff on the best science and data available to make the appropriate decisions for Oregon's wildlife.

Impaired waterway listing and delisting process

The Department of Environmental Quality (DEQ) is responsible for the listing and potential delisting of waterways as impaired. This in itself is problematic, as the reliance on a separate agency for classification work hampers the ability of ODFW to be responsive and adaptive to wildlife management decisions.

DEQ has surveyed only 40% of the waterways in Oregon at this time. They will continue the survey and classification process as their staff capacity and funding allows. This means the area of impacted state and federal lands potentially closed to beaver trapping will continue to expand as more of the state is surveyed.

The process to remove or change the classification of an impaired waterway requires DEQ staff to either create a Total Maximum Daily Load (TMDL) or clean water plan, reconsider previous data, or consider new data that may show a difference in water quality metrics. These efforts are also highly dependent on staffing capacity and funding within DEQ; something that is highly variable given the recent budget framework presented by the Ways & Means co-chairs earlier this month.

In essence, this creates a one-way process that will increase the number of impaired waterways while not allowing for an expedient off-ramp to remove them. The coupling of ODFW wildlife management decisions to the work load and funding variables of a separate agency puts the entire process in jeopardy.

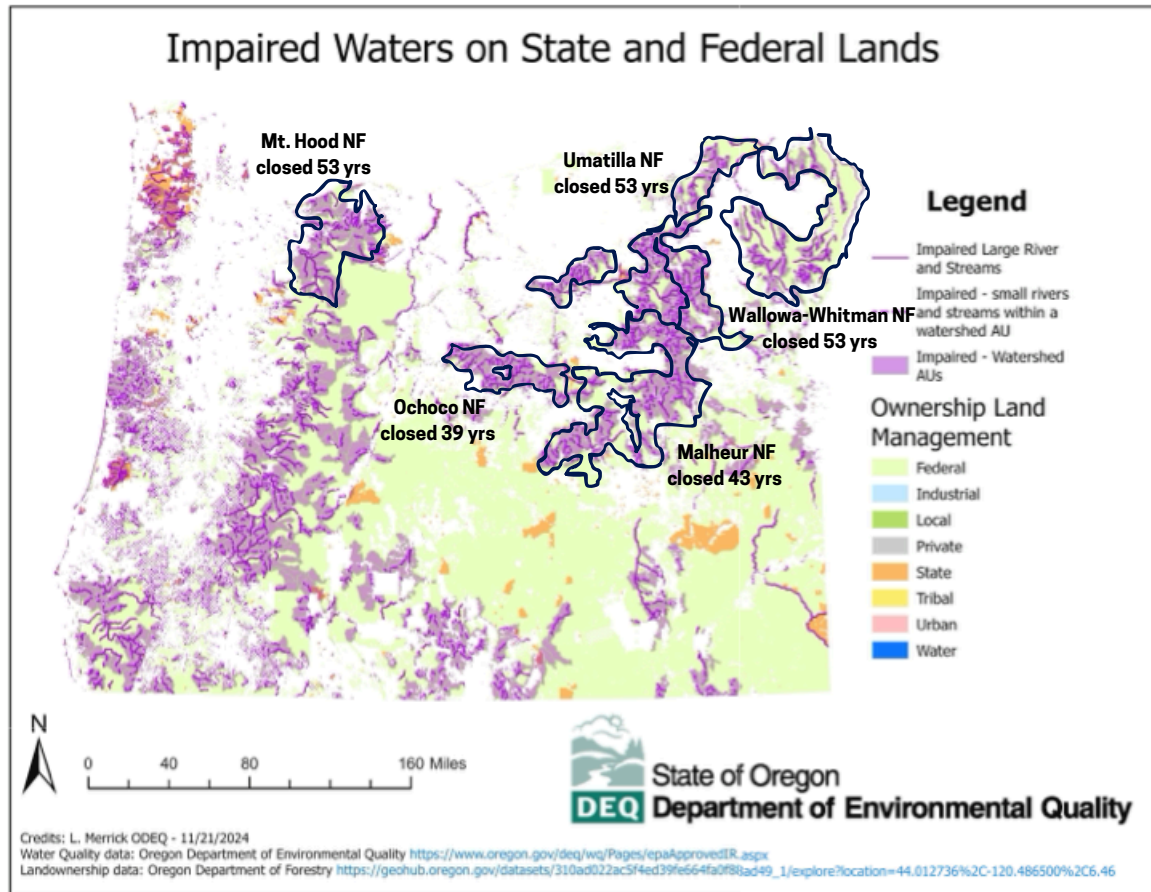
Unproven Logic

The prevailing logic of the bill is that if beaver trapping is banned, beavers will increase in number and their beneficial activities (i.e. dam building) will rectify the criteria of a category 4 or 5 impaired waterway. Unfortunately, this logic is not proven and is reliant on several factors that are not accounted for in this legislative concept.

For beavers to be present on the landscape, beaver habitat must first be present. Without the necessary habitat, beavers will not remain in a location and they will not thrive nor act as the environmental engineers we wish them to be. HB 3932 does not address the imperative fact of necessary habitat for beavers.

Trapping pressure is not a mortality factor for beavers. Beaver harvest on federal lands is a mere 1% of the total harvest, or 23 beavers, in 2023. This small amount of harvest is not a mortality factor and therefore trapping should not be considered a variable that will significantly change the prognosis of beaver presence on federal lands.

If a trapping ban equated to increased beaver presence and activity, which in turn equated to improved waterways, the logic would stand that in areas where trapping has been banned for multiple decades, we should see minimal impaired waterways. However, as seen on the map below, this logic does not bear out. The map shows the impaired waterways on state and federal ownerships with the outline of several National Forests on which beaver trapping activities have been banned for four and five decades. Note the amount of impaired waterways (purple) present inside these areas.



With very little trapping pressure, and no focus on improving habitat, the attempt to thread together the connection between a trapping ban and water improvement falls short of the scientific bar needed to restrict an activity.

OHA has historically been supportive of bans or moratoriums on trapping when they are used in conjunction with habitat improvement projects and have strict sideboards regarding data collection and timeframes. We would welcome the discussion on creating a concept based in the scientific approach of improving beaver habitat as the proven way to significantly impact the species and their potential beneficial environmental outcomes.

While we respect the bill proponent's efforts to increase beaver presence and activity on the landscape, as well as their desire to improve water quality throughout the state, HB 3932 does not provide the appropriate framework to accomplish these goals.

Thank you for your time,
 Amy Patrick
 Policy Director