

**May 1, 2025**

**To:** Chair Jeff Golden, Vice-Chair David Girod, and Members of the Senate Natural Resources & Wildfire Committee

**From:** Charles Whitwam, President, **Howl For Wildlife**

**Re: OPPOSE HB 3932A – Prohibition on Beaver Harvest Near “Impaired” Waters**

Chair Golden and Committee Members,

Thank you for the opportunity to comment. Howl For Wildlife is a grassroots conservation organization that mobilizes more than 65,000 hunters, anglers, and wildlife advocates in Oregon and across the country. Our mission is simple: defend science-based wildlife management and the North American Model that has restored species from pronghorn to wild turkey. We respectfully urge you to vote **NO on HB 3932A** for the following reasons.

### **1. HB 3932A Conflicts with Oregon’s Foundational Wildlife Statute**

Oregon Revised Statute **496.012** directs the Oregon Department of Fish & Wildlife (ODFW) to “prevent the serious depletion” of wildlife by applying the *best available science*. Acting under that mandate, ODFW convened a Beaver Management Work Group, adopted Best Management Practices, and evaluated every petition to ban trapping in four public Commission meetings since 2020. Each time, Commissioners concluded that regulated harvest **is not limiting beaver abundance**. HB 3932A would override that expert determination with a blanket ban written into statute—removing the adaptive management tool the law demands.

### **2. The Bill Misuses the DEQ “Impaired Waters” List**

The Department of Environmental Quality (DEQ) list was created for water-quality regulation, not wildlife biology. Segments added to the list rarely come off, even when conditions improve. By tying wildlife policy to this static map, HB 3932A imposes a *permanent* prohibition on beaver harvest within 200 feet of thousands of stream-miles, with **no scientific off-ramp** and no requirement that ODFW review local population data.

### **3. Proven, Humane Management Tools Will Be Lost**

Modern trapping follows nationally vetted Best Management Practices that minimize stress and by-catch. Combined with flow-control devices, culvert screens, and relocation, regulated harvest is part of a tiered strategy that protects wetlands while preventing over-abundance that can:

- Block salmon migration and degrade rearing habitat;
- Flood roads, fields, and timber stands;
- Increase costly nuisance removals that often exceed prior regulated take (Massachusetts post-1996 provides a cautionary example).

HB 3932A eliminates that flexibility and forces land managers into expensive emergency actions that satisfy neither wildlife nor taxpayers.

#### 4. The Fiscal Impact Is Real

More than **80 percent** of ODFW's wildlife budget is generated by hunting, fishing, and trapping license sales plus Pittman-Robertson excise taxes. Bans that remove an entire user group without replacing the revenue **erode conservation funding statewide**, jeopardizing projects that benefit game and non-game species alike.

#### 5. The Public-Trust Doctrine Requires Professional, Not Political, Decisions

Wildlife is held in trust for *all* Oregonians; legislators set broad goals, but professional biologists make daily decisions. HB 3932A flips that arrangement, substituting a broad legislative mandate for site-specific, science-based judgment. That sets a dangerous precedent for future efforts aimed at other species and management tools.

#### A Better Path Forward

Oregon already possesses a transparent, data-driven framework:

1. **Beaver Management Action Plan** – continuing research and population monitoring.
2. **Adaptive hierarchy** – non-lethal options first; regulated harvest where science shows it is necessary.
3. **Annual review** – public Fish & Wildlife Commission meetings where regulations can change as new data emerge.

This structure honors both beavers and the communities that share their watersheds, while keeping decisions in the hands of credentialed experts.

**In summary, HB 3932A undermines science, funding, and the public-trust principle that has guided Oregon's wildlife success story for a century.** On behalf of Howl For Wildlife and the thousands of Oregonians in our network, I respectfully ask the Committee to reject this bill and maintain a balanced, science-driven approach to beaver management.

Thank you for your consideration.

Respectfully submitted,

**Charles Whitwam**

President & Founder, **Howl For Wildlife**