



HUMANE VOTERS | OREGON

8508 SE 11th Ave.
Portland, OR 97202
503.946.1534
info@humanevotersoregon.org
www.humanevotersoregon.org

June 9, 2022

VIA Email

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

Re: "Furbearer" Regulations

Dear Chair Wahl and Members of the Commission:

Humane Voters Oregon is a nonprofit organization that works in Oregon political and governmental processes to promote the humane treatment of animals. We are not affiliated with any other state or national organization.

Humane Voters Oregon submits the following comments on the proposed "furbearer" regulations:

1. In general, we oppose killing wildlife solely for fur and recreation. Even the [North American Model of Wildlife Conservation](#), which is supported by many hunting organizations and wildlife professionals, includes the principles: "Commerce in dead wildlife is eliminated" and "Wildlife may only be killed for a legitimate, non-frivolous purpose." Hunting and trapping solely for fur and recreation is inconsistent with these principles (assuming they mean what they say). Moreover, according to license-sale information, commercial and recreational trapping benefits a very small number of people in Oregon (fewer than 2,000).
2. In particular, we oppose trapping animals for fur and recreation because it forces animals to suffer for extended periods of time, in restraining traps or in kill traps that don't work as intended, often with significant painful injuries inflicted by the traps, until the traps are finally checked and the animals are killed, or until the animals die from their injuries, thirst, starvation or predation. Moreover, traps often catch non-target species, including

pets, and subject them to injuries, pain, suffering and sometime death. Again, this is being done for the benefit of a very small number of Oregonians.

3. At a minimum, the Commission should require trappers to check their traps at least once every 24 hours to reduce the amount of time trapped animals suffer. Currently, depending arbitrarily on the species of the animal and whether it is trapped on public or private land, a trapper may be able to check a trap as seldom as once a week, even if the trap is intended only to restrain the animal. OAR 635-050-0045(12)(b). That means animals can legally be restrained in one place, without food or water, and probably with significant injuries, for up to seven days. That cannot reasonably be considered humane.
4. For the reasons above, we support the Department's proposal to close trapping on additional Department-owned land. (Exhibit I, Attachment 3, p. 3.)
5. The rules should not allow bobcats, raccoons, and opossums to be hunted at night with artificial light. OAR 635-050-0045(6). Doing so is inconsistent even with principles of fair chase recognized by hunting organizations. See <https://pope-young.org/Fair-Chase>; https://www.boone-crockett.org/huntingEthics/ethics_affidavit.asp?area=huntingEthics.
6. The rules should not allow bobcats, raccoons, foxes, and “unprotected mammals” to be hunted or pursued with dogs. OAR 635-050-0045(8). While there may be disagreement over whether hunting these animals with dogs is fair chase, the Commission should be guided by the Oregon voters, who decided in 1994 (when they adopted Measure 18) and again in 1996 (when they declined to repeal Measure 18) that hunting cougars with dogs is inhumane. There is no reason to distinguish the hunting of hunting bobcats, raccoons, foxes, or other mammals.
7. We support the prohibitions on hunting and trapping of wolverine, fisher, ringtail cat, sea otter, Canada lynx, and kit fox on grounds these species are limited in number (to the extent they exist in Oregon) and especially need protection from hunting and trapping for recreation and fur. (Exhibit I, Attachment 3, p. 12.)¹
8. The rules should not allow pursuit seasons. OAR 635-050-0170. Chasing wildlife with dogs for training, recreation and entertainment is inhumane because it traumatizes the animals without sufficient justification. However, assuming pursuit is allowed, we support the Department's recommendation to not expand the season based in part on animal welfare considerations inherent in chasing animals with dogs – at least in hot, dry weather or when they are likely to have dependent young. (Exhibit I, Attachment 3, p. 13.)
9. The rules should not allow commercial or recreational hunting or trapping of beavers. OAR 635-050-0070. In addition to the reasons stated above, beavers should be better

¹ The prohibition is included in the cited narrative but does not appear to be in the regulations themselves. We suggest including it in the regulations, as it is in the current regulations (OAR 645-050-0160).

protected because there is increasing recognition in conservation communities that their dams provide important benefits to watersheds, primarily by maintaining floodplains and riparian areas and preventing stream-channel “incision,” which helps maintain stream flows during hot, dry seasons, and is good for fish and wildlife generally. At a minimum, the rules should at least begin to reflect the recommendations in the 2022 report of the beaver management work group. In that respect, we appreciate the expansion of mandatory reporting requirements when beavers are killed. However, the rules (and the regulation summaries distributed to hunters and trappers) could do more, including clarifying that beavers cannot be treated as "predatory" animals on public land that is used under private grazing leases or permits.² We support the recommended maintenance of the existing closures, in selected areas, to beaver hunting and trapping.

Thank you for considering our comments.

Sincerely,

Brian Posewitz

Brian Posewitz
Director

² The work group report (p. 20) recommends that "regulatory and public documents" say: "Beaver is classified as a furbearer and is only classified as a predatory animal on private lands. On public lands (including public land used under grazing lease or permit), take requires a furtaker permit." In contrast, the public synopsis of regulations included with the Commission's agenda materials defines "furbearers" in part with the caveat: "For any person owning, leasing, occupying, possessing or having charge or dominion over any land (or an agent of this person) who is taking or attempting to take beaver or muskrat on that property, these two species are considered to be predatory animals." (Exhibit I, Attachment 5, p. 7.) A person could reasonably interpret the definition in the synopsis to include public land they lease for grazing or public land they "occupy" for any other valid reason and believe they are entitled to treat beavers as “predatory” animals on that land.