



HUMANE VOTERS | OREGON

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VIA Email

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

Re: Proposed Furbearer Regulations for 2020-22

Dear Chair Wahl and Members of the Commission:

Humane Voters Oregon offers the following comments on the Furbearer Trapping and Hunting Regulations for the 2020-2021 and 2021-2022 seasons. We understand this issue is on your agenda for the meeting of June 12, 2020.

By way of background, Humane Voters Oregon was formed in 2014 to help advocate for humane treatment of animals in Oregon. We participate in policymaking proceedings before administrative agencies, the state legislature, and local governments. In addition, we participate in Oregon's electoral process. We have board members from a variety of animal welfare organizations but are not affiliated with any other state or national organization.

We have the following comments on the draft rules:

1. In general, we oppose trapping and killing wildlife solely for its fur. Please consider, from public comments received and other information, whether most Oregonians also oppose this. Please also bear in mind that, according to license-sale information in the rulemaking notice, rules allowing the trapping and killing of wildlife for its fur appear to be for the benefit of a very small number of Oregonians who participate in these activities – less than one tenth of one percent.
2. We oppose trapping, in particular, because it forces animals to suffer for extended periods of time, in a restraining trap or a kill trap that did not work as intended, and often with

significant painful injuries inflicted by the trap, until the trap is finally checked (and the animal killed), or until the animal dies from its injuries, thirst or starvation. Moreover, traps often catch non-target species, including pets, and subjects them to injuries, pain, suffering and sometime death. Again, this is being done for the benefit of a tiny portion of Oregon's population. Please see the joint comments we submitted with other organizations for additional information on these points.

3. If nothing else, 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 on the species and whether the trapping is on public land 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 and not kill 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. In this day and age, that cannot be considered humane. We also elaborate further on this point in our joint submittal with other organizations. We recognize there may be legal questions regarding the Commission's authority to require 24-hour trap-check times for all species on all lands but believe the better argument is that legislative direction on the subject establishes the minimum, not the maximum, frequencies in which traps must be checked.
4. We oppose the provision allowing bobcats, raccoons and opossums to be hunted at night with artificial light, OAR 635-050-0045(6), on grounds that doing so is inconsistent with principles of fair chase. See <https://www.pope-young.org/fairchase/default.asp>; https://www.boone-crockett.org/huntingEthics/ethics_affidavit.asp?area=huntingEthics.
5. We oppose the provision allowing bobcat, raccoon, fox, 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. We see no reason to think it is any different for bobcats, raccoons, foxes, or other mammals.
6. We support the prohibition on the use of traps or snares suspended in trees in the Siskiyou and Siuslaw National Forests. OAR 635-050-0045(18). We understand this is to protect Humboldt martens, which are struggling for survival as a species.
7. We support the prohibitions on hunting and trapping of wolverine, fisher, ringtail cat, sea otter and kit fox, OAR 635-050-0160, on grounds these species are limited in number (to the extent they exist in Oregon) and especially need protection from hunting and trapping for their fur.
8. We oppose the proposed pursuit seasons. OAR 635-050-0170. Chasing wildlife with dogs – for training, recreation and entertainment – is traumatizing to the animals and inhumane.
9. We oppose the hunting and trapping of beavers. OAR 635-050-0070. In addition to the reasons stated above, beavers should be better 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

“incision,” which helps maintain stream flows during hot, dry seasons, and is good for fish and wildlife generally. We understand the Commission will receive a request from numerous restoration groups, supported by numerous conservation organizations, to prohibit beaver hunting and trapping at least on federal public lands. We support this request as a good first step toward better protection of beavers.

Thank you for considering our comments.

Sincerely,

Brian Posewitz

Brian Posewitz
Director