

Friday, January 30, 2026

Thank you for the opportunity to comment.

APHIS-Wildlife Services has been criticized for decades by scientists across the political spectrum in many disciplines. The criticisms are as true now for beaver damage management as they were then. In brief, APHIS-WS does not use the best available science but instead cherry-picks studies it favors often funded by itself or done by its own staff, and ignores or dismisses peer-review better science undermining APHIS-WS claims. APHIS-WS is not a science-based organization therefore. Also APGIS-WS does not respect the wishes of the majority of US residents but instead favors a narrow minority with concerns for property or agriculture. The Congressional act that created and authorizes APHIS-WS is not tunnel visioned in any way so APHIS-WS is headed for Congressional defunding some day. In the case of beavers, the best published, peer-reviewed research with high standards of evidence and robust inference shows that beaver dams do not harm trout fisheries. Also non-lethal methods can effectively protect property from flooding and damage from beaver tree-cutting behavior. Moreover, beavers add to the diversity and health of ecosystems. I oppose all APHIS-WS damage management plans that include lethal management because the agency does not do good science and does not justify its actions to the broad public.