

Dear ODFW Commissioners:

December 6, 2019

My name is Fran Recht. I'm here to ask that you direct ODFW staff to look into enacting beaver trapping restrictions within the boundaries of the Siuslaw National Forest as that forest has requested and also on state lands in the Upper Nehalem where the Upper Nehalem Watershed Council is doing intensive restoration and planting work to encourage beavers. I have provided you a packet of letters requesting or supporting such trapping restrictions from the Siuslaw National Forest, the Upper Nehalem Watershed Council, Biosurveys LLC and Trask Consulting, the MidCoast Watersheds Council, Dr. Jordan from National Marine Fisheries Service, and former ODFW fisheries biologist Kevin Goodson.

Oregon Coast Coho are listed as threatened in these watersheds and encouraging beavers and their dam building activity is called for in the Oregon Coast Coho Conservation Plan that this Commission approved in 2007, as well as in the federal recovery plan. As ODFW's coho conservation plan notes: "Increasing the number of beaver dams in areas where dams are limited that create high quality rearing habitat will create stream complexity and increase the coho smolt capacity of populations and the ESU, which will help the populations and ESU build towards desired status."

I manage the habitat program of the Pacific States Marine Fisheries Commission and through my work with watershed councils and in partnerships with federal, state, tribal and non-governmental conservation organizations, it has become clear that despite the tremendous amount of state, federal and tribal money going into supporting great restoration work, we're not working fast enough or intensively enough on a watershed scale to recover coho salmon and to maintain cold, clean, abundant water in many of our stream systems. In fact, the challenges we face are anticipated to continue and intensify in a warming climate with longer dry periods and more intense, flashier storms.

The National Marine Fisheries Service, the U.S. Forest Service, and U.S. BLM and many watershed councils and other non-profit groups are working in many regions and across the landscape to encourage beavers to build dams and create habitat. There are also many groups and individuals working actively to help landowners "live with beaver", finding solutions for the problems they can cause, so beavers aren't trapped out or otherwise killed. I've made 4 short videos featuring landowners and experts that groups can use in their educational outreach to explain beaver benefits and various solutions: <http://habitat.psmfc.org/living-with-beaver/>

Despite the threatened status of Oregon Coast Coho and despite the well-known benefits of retaining beavers so they can create the complex habitat conditions that are needed to sustain and rebuild these populations of threatened fish, almost all the current areas on public lands that have beaver trapping restrictions in place are east of the Cascades. The requested Siuslaw Forest and Upper Nehalem restrictions, would be the first in coastal basins.

As you are likely aware, beavers on public land are managed by ODFW as furbearers and a license is required to trap them. An unknown but presumably much larger number of beaver are taken on private lands under Oregon Department of Agriculture's "predator" control statute. Hunting, trapping, and poisoning are all allowed with no questions asked as a "damage control" mechanism and with no records kept. Many of the same trappers work both on private lands and on public lands under both

these mechanisms. Anecdotal reports from landowners and trappers, mention whole watersheds being trapped out, so that beavers don't "re-seed" from public lands onto the private lands.

There is speculation that recreational trapping does not affect beaver populations. However, there has never been a study in Oregon to determine if preventing such trapping can rebuild or restore beaver populations where habitat restoration has occurred. The Upper Nehalem beaver restriction area could be a pilot project that would allow such a study. The Watershed Council has a major restoration effort funded by NOAA using beaver dam anchors and tree thinning and dense planting of beaver-favored food to restore beaver and their habitat. These efforts are designed to get as big a response as possible from beaver recovery and it is intensively monitored, including for coho benefits. This could provide a treatment site to allow ODFW to study the impacts of curtailment of trapping. Nearby areas without a trapping ban could serve as controls. Conservation Strategy funds could possibly be used to implement this study. OWEB research funds could also be sought to help fund such a study.

Protecting important coho habitat on public lands from beaver trapping will also send an important message to Oregonians that beaver are a keystone species and the habitat they create is of critical importance to the recovery of wild Coho Salmon. This could help reduce the use of lethal measures to address beaver damage on private land.

I hope you will assist in the recovery of coho salmon on the coast. Please direct ODFW staff to look into enacting the beaver trapping restrictions being requested by the Siuslaw National Forest and the Upper Nehalem Watershed Council on state lands above the Humbug Creek confluence. I would be happy to work with your staff and those parties to implement these changes.

Sincerely,

*Fran Recht*

Fran Recht  
P.O. Box 1344  
Depoe Bay, OR 97341  
541-765-2234  
franrecht@gmail.com

10/31/2019

To:

**ODFW Commissioners**

From:

**Steve Trask**

Senior Fish Biologist for Bio-Surveys, LLC  
and Trask Consulting, Inc.

This is a letter of support for the proposed request to develop a beaver trapping ban pilot project in the Upper Nehalem Basin on ODF managed State lands.

There is a large movement throughout the west that is developing momentum to focus aquatic and riparian recovery funding on restoring beaver to ecosystems where their numbers have been dramatically reduced from what is known to have been much higher historical levels of abundance. Beaver recovery has become one of the primary goals of both Federal and State recovery planning documents for both restoring ecosystem processes and for the recovery of listed salmonid species.

In the steep coastal watersheds of Oregon, the loss of large wood and the reduction in the abundance of Beaver dams that provide water storage, low velocity refugia and the capacity to store forest nutrients that benefit a complex food web have crippled our aquatic corridors for the production of not only salmonids but a vast array of other wildlife species.

Our firm has been providing technical assistance to watershed councils and agencies now for 31 years. Our focus has been entirely on the restoration of ecosystem function that trickles down to the provision of healthy, productive and self-sustaining stream networks for our precious populations of anadromous fish species. After all this time it has become clear to many of us working on the ground in the biological arena that the recovery of system function will remain unachievable without the assistance of all of the key players that originally formed the ecosystems we manage.

Recently, the Upper Nehalem Watershed Council and its partners completed NOAA-funded work that furthers the actions called for in the Federal Oregon Coast Coho Salmon recovery plan. This plan, which is to recover the threatened coho salmon, highlights the importance of restoring beaver dam complexes to the landscape for the meaningful recovery of coho salmon. This effort has coalesced into a multi-year funding plan toward beaver recovery in the headwater subbasins of the Nehalem (where the existence of an ancient sea bed provided the low gradient stream networks that beaver prefer for dam building). In 2018-2019, 60 Beaver dam analogues were installed in 7 different subbasins to provide a foundation for beaver colonization. This project will continue to expand into many more subbasins of the Upper Nehalem in the next 10 years. Extensive monitoring to evaluate the efficacy of these installations has been incorporated into the projects goals and objectives. All of the project

sites also include extensive investments in a riparian recovery plan that emphasizes the provision of appropriate food species for beaver.

I'm writing to you not only to highlight the importance of this recovery trajectory as we get closer to the critical aquatic thresholds presented by climate change but to also attempt to convince you of the importance of providing your restoration professionals on the ground with a chance to succeed.

It is my opinion that if beaver continue to be the target of commercial, recreational or pest management trapping, the efforts of a large consortium of restoration partners, agencies and funders will continue to fail to achieve the stated goals of all of our planning documents. We need beaver to prosper to be able to function as the keystone species that we know they are.

We support this proposed ban on ODF lands in the Upper Nehalem Basin (above the confluence of Humbug Cr) as a Pilot Project. We think this area is of significant enough size on the landscape scale to be capable of detecting and quantifying benefit within a 10 year horizon.

Thank you in advance, for your judicious consideration of this request.

Steve Trask



**File Code:** 2520  
**Date:** December 3, 2019

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

Dear Chairperson Wahl and Fish and Wildlife Commissioner members:

I am writing to request that you enact trapping restrictions on beavers within the boundaries of Siuslaw National Forest, as you have done for other national forests. National Forests that have restrictions include: the Mt. Hood National Forest, Ochoco National Forest, Malheur National Forest, Willow-Whitman National Forest, and Umatilla National Forest.

In partnership with the State of Oregon, we have been focusing time, energy and funding into large-scale aquatic restoration projects in addition to our Salmon Super Highway partnership with numerous stakeholders. Aquatic restoration improves the flow of the water through the system, ensures passage of aquatic organisms, improves the watershed condition, and facilitates the recovery of the Coastal coho salmon. Beavers are a key component to restoration of the watersheds and the ecosystem.

Our forest has dedicated tens of thousands of staff hours and have spent hundreds of millions of dollars on aquatic habitat restoration efforts over a 30-year period. Despite these efforts, our ability to restore and conserve these watersheds as resilient strong-holds, including for downstream municipal water supplies, is hampered without beavers. The sustained presence of beavers and their dams depends on having active beaver dams maintained by active beaver colonies. Resiliency of the aquatic ecosystems is critical as we address changes in temperature regimes, weather patterns, and water availability.

Our efforts focus on recovering Coastal coho, supplying municipal water, and ensuring resilient landscapes. We are asking for your assistance in assuring that beaver trapping does not occur on the national forest. We recognize that trapping can occur on private lands. We actively work with and respect our private land neighbors. For example, our stewardship (Wyden Authority) program allows us to work with private land owners and fund projects on private lands that facilitate restoration efforts across all lands. Without a ban on trapping beaver on national forest lands, our efforts are stymied. Please consider this ban and assist us in optimizing the use of our funds (both federal and State), supporting aquatic restoration efforts, and ensuring the good work we have done continues into the future.



Thank you in advance for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert Sanchez". The signature is written in a cursive, flowing style.

ROBERT SANCHEZ  
Forest Supervisor

cc: Tere O'Rourke



# MidCoast Watersheds Council

*Watersheds of the Salmon River, Siletz River, Yaquina River,  
Alsea River, Yachats River, and Ocean Tributaries*

December 4, 2019

Dear Fish and Wildlife Commissioners:

The MidCoast Watersheds Council supports the request of the Siuslaw National Forest to restrict beaver trapping within the forest boundary.

We work closely with the Siuslaw National Forest through the public-private-tribal Alsea Stewardship partnership. We collaborate on restoration planning and projects on our public lands as well as on downstream private lands that benefit coho, steelhead, and other species. A beaver trapping restriction will help assure that the conservation and restoration work that the forest is doing can be sustained over time, and that the water flowing out of the national forest can continue to provide the key habitats and cold water refugia that benefit our work.

We have spent many millions of dollars of state funds planning and implementing projects with the help of ODFW staff that assure fish passage, restore large wood to streams, improve riparian conditions, and restore floodplain and estuarine marsh connectivity. These are all helping to restore the ecological processes that were curtailed in the past. However, the scale and reach of our work seems small compared to the challenges faced.

Beaver work round the clock to do the type of work that needs to be done to restore watershed conditions, and can do it efficiently. They don't need years to plan, fund, permit and implement a project! While certainly beavers can be challenging to roads and treasured trees, we have also worked to inform people of the benefits of beaver and how to "live with beaver". However, progress is slow and beavers continue to be removed from both public and private lands and accordingly many dams fail without the continued maintenance provided by these animals, draining the impounded water necessary for coho over-wintering habitat.

We think that restricting beaver trapping in the Siuslaw National Forest would have significant positive watershed level impacts and help protect designated coho critical habitat on the forest (see attached maps). It will also provide us with places for fieldtrips to show, on the ground, the benefits of beaver presence and how beaver mitigation devices can work.

Please support beaver trapping restrictions within the Siuslaw National Forest.

Thank you,

A handwritten signature in blue ink that reads "Paul Engelmeyer".

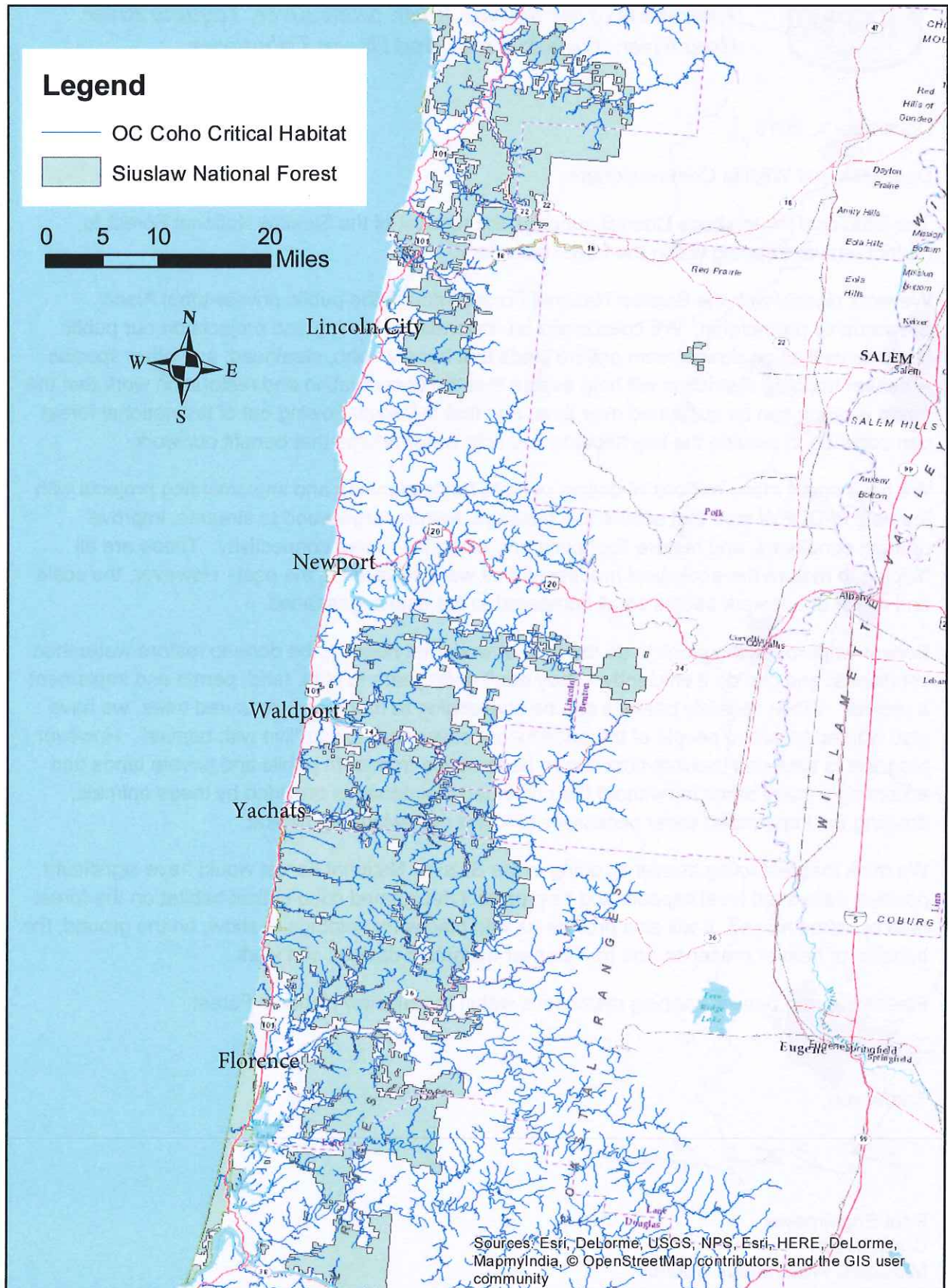
Paul Engelmeyer  
Chairperson  
MidCoast Watersheds Council

411 NE Avery Street, Suite B  
Newport, OR 97365

(541)265-9195

[www.midcoastwatersheds.org](http://www.midcoastwatersheds.org)

# The Siuslaw National Forest (green) conserves and enhances Coho Critical Habitat (blue)





UNITED STATES DEPARTMENT OF COMMERCE  
National Oceanic and Atmospheric Administration  
NATIONAL MARINE FISHERIES SERVICE F/NWC1  
Northwest Fisheries Science Center  
Conservation Biology Division  
2725 Montlake Boulevard East  
SEATTLE, WASHINGTON 98112-2097

Dr. Christopher E. Jordan, Program Manager  
Mathematical Biology and Systems Monitoring Program

11/25/2019

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

To whom it may concern:

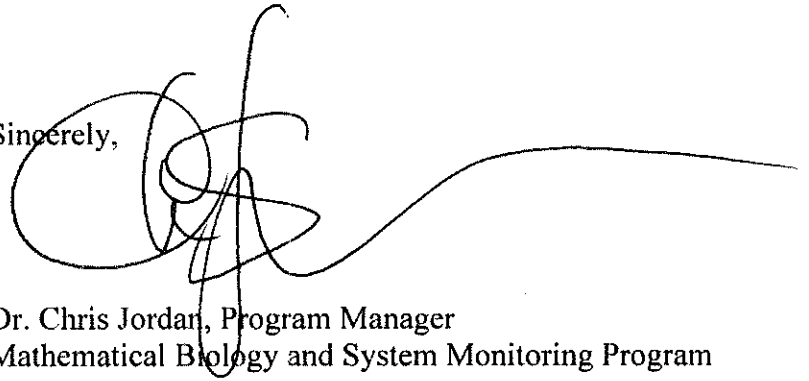
The federal Oregon Coast Coho Recovery Plan was published on December 1, 2016. This plan, building on earlier efforts, calls in particular for “continued actions to repair the ecosystem processes that influence the health and stability of the rearing habitats for juvenile coho salmon”. One of the emphasis areas in the plan is actively managing beavers and beaver dam building to create and maintain such habitat.

One of the four limiting factors noted in the Recovery Plan is the reduced quantity and quality of stream habitat for juvenile rearing and overwintering. Good habitat for coho includes large wood debris structures, pools, connections to side channels and off-channel alcoves, beaver ponds, lakes, and connections to wetlands, backwater areas and complex floodplains. Many of these habitat conditions are generated and maintained by connecting streams and rivers to their surrounding landscape. The Recovery Plan notes: “Beaver provide considerable help in providing this connection and in maintaining proper watershed functioning in Oregon coast streams”.

Beavers were once ubiquitous in Oregon’s watersheds. The historic removal of beavers is thought to have had a significant population impact on coho salmon. For example, colleagues from the Northwest Fisheries Science Center and the University of Washington document these impacts in the Stillaguamish basin in western Washington (<https://doi.org/10.1577/M03-156.1>). They show that the greatest reduction in coho salmon smolt capacity originated from the extensive loss of beaver ponds in this watershed. The current summer smolt production potential (SPP) for the Stillaguamish River basin was calculated to be 965,000 smolts, as compared with a historic summer SPP of 2.5 million smolts. The 61% deficit in capacity results mostly from the loss of beaver ponds. An even more dramatic reduction (86%) in winter habitat capacity was estimated - again most of the overall reduction resulted from the loss of beaver ponds.

Beaver recovery on a coast-wide scale will have significant benefits to coho salmon populations. I urge you to consider the management of beavers in Oregon as a robust, viable tactic that underlies the rebuilding of healthy salmon populations state-wide. Fostering opportunities for beaver-based stream restoration methods (e.g., Beaver Dam Analogs and Post Assisted Log Structures), techniques to mitigate human-beaver conflicts (e.g., pond-levelers, culvert protectors, translocation), and active population management (e.g., harvest and removal controls) are all viable approaches to increase the beneficial stream habitat impacts that beavers can have in Oregon watersheds.

Sincerely,

A handwritten signature in black ink, consisting of several overlapping loops and a long horizontal tail extending to the right.

Dr. Chris Jordan, Program Manager  
Mathematical Biology and System Monitoring Program

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

December 04, 2019

Oregon Fish and Wildlife Commission,

This letter is in support of proposals being presented at your December 6, 2016 meeting by the Siuslaw National Forest and Fran Recht to exclude certain public lands in the Oregon Coast Coho ESU from beaver trapping.

As a former ODFW fisheries conservation biologist that helped develop the Oregon Coastal Coho Conservation Plan, I can attest to the need to take these types of actions to rebuild the wild Oregon Coast coho populations. Beaver have had a critical role in creating excellent over-winter and over-summer rearing habitat for juvenile coho, steelhead, cutthroat and lamprey throughout the eons that these species have coexisted in coastal watersheds.

There is no denying that beaver populations are a fraction of what they were when these species co-evolved in coastal watersheds, and that there are fewer beaver dams and ponds in these watersheds than were present prior to human development. Millions of dollars have been spent over the past three decades to try to restore the habitats that beaver can create in an effort to rebuild Oregon's native salmon, steelhead and trout populations. Despite all of these efforts, it is difficult to discern an improvement in the quantity and quality of fish habitat. It is time for bolder measures to move the needle on watershed restoration.

While it may be true that recreational beaver trapping takes fewer beaver each year than damage trapping, excluding recreational trapping on public lands where restoration work has occurred may help beaver populations to grow or re-inhabit streams in these watersheds. As far as I know, there has never been a study in Oregon to see if excluding trapping in areas where habitat work has occurred can lead to increased beaver dams/ponds. What is being proposed for the Upper Nehalem state lands is an ideal situation to conduct such a study and I strongly encourage ODFW to take advantage of this opportunity. The results of such a study would inform whether such measures are effective, or unnecessary.

Another benefit of implementing restrictions on beaver trapping on certain public lands, is how it could change the public perception of beaver. Currently, many landowners have beaver lethally removed from their property to address damage. ODFW has spoken with two voices on this. Fisheries biologists promote coexisting with beaver, but your regulations say it's ok to take beaver anywhere you want. If all of ODFW spoke with one voice that says beaver are needed in important coho streams and trapping will not be allowed there, it may become easier to get landowners to use non-lethal methods to address beaver damage – which could make a substantial improvement in the quantity of beaver, their ponds, and our native fish.

The public perception of beaver has already begun to change. There is a growing voice in Oregon that wants to see more done to promote beaver, and is asking for restrictions on trapping. I hope ODFW can be proactive and implement the modest changes proposed by the Siuslaw National Forest and Fran Recht. Continuing to ignore those voices will diminish the Department's credibility and could lead to those voices seeking other avenues to get protections for beaver.

Thank you for considering these proposals. As a longtime Beaver Believer, I would be happy to help staff implement these proposals, or design the study to assess their effectiveness.

Kevin Goodson  
36362 Devitt Road  
Blodgett, OR 97326



Upper Nehalem Watershed Council  
1201 Texas Avenue, Suite A  
Vernonia, Oregon 97064  
[www.nehalem.org](http://www.nehalem.org)

Re: Beaver trapping restrictions in the upper Nehalem above river mile 34

Date: December 6, 2019

Dear Commissioners:

The Upper Nehalem Watershed Council (UNWC - est. 1996) has invested millions of public dollars working with willing landowners, stakeholders, advisors and funders to analysis watershed health, and implement projects focused on improving salmon migration and stream habitat conditions in order to increase Coho salmon survival in the Nehalem basin.

One of the areas of particular interest for us is the watershed area above river mile 34 (118 miles from headwaters to the Nehalem Bay). This area historically produced hundreds of thousands of salmon smolts each year. Based on state of the art watershed analysis including extensive stream surveys we know the salmon production potential in the upper Nehalem basin still exists and we are working diligently to improve aquatic habitats. We are working specifically to restore the low gradient areas in the upper Nehalem watershed. Historically these areas were laden with old growth logjams and winter-persistent beaver dams that assured flood plain connection, ground water recharge and provided ample salmon spawning, rearing and refuge habitat, saturated with cool clear water essential for maximum salmon production. These stream reaches became degraded over time by human land-use impacts. However, through analysis we find certain stream reaches intact enough to serve as anchor habitats. Currently we are actively enhancing multiple stream anchor habitats by installing complex large woody debris (LWD) structures and beaver dam analogues (BDA – picket posts woven with brush to raise the water level and attract beavers) supplemented with willow plantings for Beaver food. With the support of the Oregon Department of Forestry, ODFW, NOAA, National Fish and Wildlife Foundation and Trask Consulting the UNWC recently installed 40 BDA's and 15 LWD structures on ODF lands along anchor habitat reaches.

While we have observed Beaver presence throughout the upper watershed, we are concerned with the over-all health condition of the Beaver population and our lack of understanding of factors limiting the abundance of the Beaver population. At this point recreational Beaver trapping will not allow full Beaver population recovery in the anchor habitats and the ODFW trapping reporting requirements are inadequate, limiting our ability to understand how trapping effects our recovery approach. Our goal is to allow Beaver colonies to re-establish along anchor habitat stream reaches on public land to improve salmon rearing and refuge habitat in the upper reaches of Coho producing streams in the upper Nehalem watershed.

Therefore, we request a recreational trapping Beaver trapping restriction be put in place on public land managed by the Oregon Department of Forestry in the upper Nehalem watershed (See map: includes portions of Cow, Buster, Little Fishhawk, Squaw, Northrup, Deep, Fishhawk, Oak Ranch, Rock, Wolf and Lousignont Creeks).

We also recommend ODFW initiate a Beaver population study in the North Coast Range that includes a limiting factors analysis that would document the effect of trapping, disease, predation, flooding and food source presence on the Beaver population's ability to survive and thrive. Increased knowledge would allow ODFW to improve Beaver management and improve the potential success of our Coho recovery efforts for the greater good of all concerned.

Thank you for your consideration of our request.









Sincerely,

Maggie Peyton - UNWC Executive Director

With the support of the Upper Nehalem Watershed Council Board of Directors

# Proposed Beaver Trapping Restriction Areas in the Upper Nehalem Basin

## Land Ownership

-  Federal
-  Local Government
-  Private
-  Private Industrial
-  State
-  Nehalem Sub Basins
-  Proposed Beaver Trapping Ban Areas
-  Anchor Habitat Score

