

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