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 coevolved 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.

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