

Upper Nehalem Watershed Council 1201 Texas Avenue, Suite A Vernonia, Oregon 97064 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

