

February 10, 2026

Attn: Oregon Department of Fish and Wildlife Commission
Oregon Department of Fish and Wildlife (ODFW)
4034 Fairfield Industrial Drive SE
Salem, Oregon 97302
odfw.commission@odfw.oregon.gov

Dear ODFW Commission-

Oregon Parks and Recreation Department (OPRD) is seeking a rule exception to stock controlled sterile triploid Grass carp (*Ctenopharyngodon idella*) within the secondary sewage lagoon at Beverly Beach State Park to control an extensive duckweed population that inhibits the overall function of the lagoon.

OPRD is seeking an exception to OAR 635-056-0075 (1)(a)(A)(i) which states:

(1) Controlled Fish

(a) Grass carp (*Ctenopharyngodon idella*): Grass carp may be released into water bodies within Oregon only pursuant to the issuance of a permit from the Department. Complete permit applications shall be submitted to Department headquarters at least 60 days before proposed stocking. A fee of \$250.00 (plus a \$2.00 license agent fee) shall be charged for each Grass carp permit issued.

(A) The following restrictions and standards will govern the issuance of grass carp permits:

(i) Stocking will occur only in water bodies which are:

(I) Completely within private land; **or**

(II) On land owned or controlled by irrigation districts or drainage districts.

Reason for exception:

As a public agency, OPRD does not meet the landowner requirements of ODFW's grass carp permit rule section (1)(a)(A)(i). However, section (1)(a)(A)(xv) of the same rule specifies that the Commission may grant an exception to (1)(a)(A)(i). OPRD recognizes the benefits of utilizing sterile triploid Grass carp as a biological control to manage aquatic weeds that have been inhibiting the overall function of its wastewater system. OPRD would like to stock sterile triploid Grass carp into the 1.15 acre sewage lagoon at Beverly Beach State Park. This lagoon is the last phase of the wastewater treatment system for the park. The lagoon characteristics meet the other requirements of the grass carp stocking permit regarding containment of fish and restricted public access. Water exiting this lagoon flows into the park's irrigation system and is dispersed through a sprinkler system on park property. OPRD will fully comply with all stated OARs for grass carp introduction, similar to private landowners and irrigation/drainage districts. The public is prohibited from accessing the wastewater lagoon as it is separated from recreating areas within Beverly Beach State Park by both a fence and signage stating "No public access". The lagoon is fully screened to restrict fish movement and the wastewater system is a fully closed system, both of which

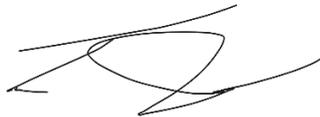
restrict routes of escape for the fish. Wildlife deterrents could be deployed around the lagoon if deemed necessary to minimize accidental movement through predation. The wastewater lagoon resides outside of the 100-year floodplain and if it were to become inundated, it would likely be with saltwater and the grass carp would be killed.

OPRD wishes to stock 15 grass carp within its 1.15 acre secondary sewage lagoon at Beverly Beach State Park to manage a duckweed infestation. The duckweed problem is year-round due to mild winter temperatures and its peak growth coincides with the busiest time of year for park visitation and demand on the wastewater system. Park staff manually remove duckweed from the lagoon surface multiple times per week during the summer months. This involves multiple staff and a lengthy process of skimming the duckweed to the lagoon edges with floating booms. This pulls staff away from other park operations and puts their safety at risk through potential exposure to untreated wastewater. Past control methods also include the use of herbicides. While the herbicides were somewhat effective at reducing the duckweed population, it is believed that these chemicals detrimentally affected the community of beneficial microorganisms integral to the overall function of the wastewater system. OPRD believes that herbicide applications should be used sparingly and seeks to introduce a different method of Integrated Pest Management. Although there is no direct drainage of the wastewater system to nearby Spencer Creek, this small tributary is Essential Salmonid Habitat for cutthroat, coho and steelhead, and OPRD would like to move away from pesticide use near this sensitive area.

OPRD believes that grass carp stocking into the wastewater lagoon will be a safer, more effective means of controlling duckweed (and other potential aquatic vegetation). Using the grass carp as a biological control is expected to promote optimal functioning of the last phase of the sewer lagoon, save staff time from removing duckweed and reduce their exposure to incompletely treated wastewater, as well as reduce the use of chemical herbicides near sensitive habitat. Please consider OPRD's request for an exception to OAR 635-056-0075 (1)(a)(A)(i) and permit the stocking of grass carp to the Beverly Beach State Park secondary wastewater lagoon.

Thank you for your time.

Sincerely,

A handwritten signature in black ink, appearing to read 'Tate Pyle', with a stylized, overlapping loop structure.

Tate Pyle
Natural Resource Specialist
Oregon Parks and Recreation Department (OPRD)
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Seal Rock, Oregon 97376
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