



July 18, 2025

**Via Regulations.gov**

Ms. Katherine McCafferty  
U.S. Army Corps of Engineers  
Attn: CECW-CO-R  
441 G Street NW  
Washington, DC 20314

**Re: Comments on Proposal to Reissue and Modify Nationwide Permit 27,  
Docket No. COE-2025-0002**

Dear Ms. McCafferty,

The Southeast Beaver Alliance submits these comments regarding the U.S. Army Corps of Engineer's ("Corps") draft of Nationwide Permit 27 ("NWP 27"). We commend the Corps for recognizing the ecological value of beavers and the role of process-based restoration ("PBR") techniques in enhancing aquatic ecosystems in this draft. We believe these provisions will encourage alternative and innovative methods in aquatic restoration, particularly those involving beavers.

Specifically, we support the language requiring authorized aquatic ecosystem restoration, enhancement, or establishment activity to be "planned, designed, and implemented so that it results in an aquatic ecosystem that resembles an ecological reference (i.e., a natural ecosystem)" and providing that an ecological reference may be based on the "characteristics of aquatic ecosystems or riparian area that existed in the region in the past."<sup>1</sup> We also support the language stating that multithreaded networks of stream channels and wetlands were common in North America, that anthropogenic changes have substantially degraded river-wetland corridors leading to multiple thread channels becoming single thread channels, that beaver harvesting and removal of large wood contributed to losses of stream and wetland complexes in river valleys, and that removal of ecosystem engineers such as beavers can alter habitat.<sup>2</sup>

We appreciate the Corps' recognition of process-based restoration as a viable tool to "reestablish the rates and degrees of physical, chemical, and biological processes that sustain riverine ecosystems, including their floodplains."<sup>3</sup> We also thank the Corps for including how PBR can improve habitat for native fish species, improve or protect water quality, and improve the dynamism and diversity of river and stream corridors.<sup>4</sup>

---

<sup>1</sup> U.S. Army Corps of Engineers, *Draft Decision Document, Nationwide Permit 27* (2025) at 1 [herein "Draft NWP 27"].

<sup>2</sup> See *id.* at 10, 43, 51.

<sup>3</sup> *Id.* at 69.

<sup>4</sup> See *id.* at 69.

We also strongly support coverage under the permit of activities which attempt to restore anastomosing river-wetland corridors as well as beaver dams, beaver dam analogs (“BDA”), and post-assisted log structures (“PALS”) as low-tech river or stream corridor restoration activities.<sup>5</sup> Additionally, we appreciate the Corps’ recognition that hydrologic restoration approaches, such as beaver reintroduction, may be more effective than in-stream habitat restoration projects.<sup>6</sup> These provisions in the draft NWP 27 support the Southeast Beaver Alliance’s objective of elevating PBR as a valuable restoration strategy—one that recognizes the ecosystem services provided by beavers, large woody debris, and multi-thread stream and wetland channels.

The Corps has estimated that NWP 27 will be used approximately 1,375 times per year on a national basis, resulting in impacts to approximately 13,100 acres of waters of the United States.<sup>7</sup> Since this permit will be used widely we recommend that, in cases where beavers colonize a single-thread channel, the associated performance criteria—particularly for stream mitigation banks—be adjusted to reflect multi-thread stream and wetland (beaver complex) success metrics. Additionally, we recommend that flow devices (sometimes called pond levelers, culvert fencing, or “beaver deceivers”) be recognized in NWP 27 as an approach to preserve beaver-restored habitat while still controlling flooding of infrastructure caused by beaver dams.

The inclusion in the draft NWP 27 of the provisions highlighted here demonstrates that the Corps recognizes the importance of adding PBR to our toolbox of stream and wetland restoration techniques. For proponents of beaver-led aquatic restoration, this language will enable practitioners—including bankers—to develop designs that incorporate and sustain beaver-created stream and wetland habitats.

We appreciate this opportunity to provide feedback on the draft 2026 Nationwide Permit 27. We look forward to working with the Corps to help conserve and restore the ecosystems which house the country’s rich biodiversity. If you have any questions or would like to discuss these comments further, please contact us at [southeastbeaver@gmail.com](mailto:southeastbeaver@gmail.com).

Sincerely,

Tony Able  
Chair

Catherine Crafa  
Vice Chair

---

<sup>5</sup> See *id.*

<sup>6</sup> See *id.*

<sup>7</sup> See *id.* at 105-6.