



Native Fish Society

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Fighting for the Future of Native Fish

Conserving biological diversity of native fish and protecting their habitats

Date

Memorandum

TO: Oregon Legislature

FR: David Moskowitz, Confluence Consulting, on behalf of
Bill Bakke, Executive Director

RE: ODFW proposed economic stimulus projects

Dear Senators and Representatives:

I am writing on behalf of the Native Fish Society regarding the economic stimulus projects proposed by the Oregon Department of Fish and Wildlife (ODFW) that are part of SB 338.

The Native Fish Society opposes the proposed spending from proceeds of the sale of state bonds for ODFW projects as proposed in SB 338 for the following reasons:

1. The proposed package of actions by ODFW for capital and deferred maintenance projects is not based on furthering its principle mission to protect Oregon's native fish and wildlife legacy.
2. The proposed package of actions does little if anything to prepare ODFW to meet the challenges of population growth and development on native fish and wildlife.
3. The proposed package of actions does little if anything to prepare ODFW to meet the challenges posed by climate change and the need to identify and protect those resilient habitat types that will act as bridges to the future for Oregon's native fish and wildlife.
4. The proposed package of actions for ODFW expenditures has not been evaluated for consistency with requirements the agency is under to comply with the federal Endangered Species Act and the Clean Water Act.
5. There has been no evidence that the particular projects proposed for funding will result in short-term economic stimulus nor add structural resiliency or future economic benefits to the citizens of Oregon.

6. The Stimulus Package in SB 338 is inconsistent with recovery of species at risk. This SB 338 list for ODFW is a wholly inconsistent response to the actual need to prevent the serious depletion of indigenous species, which is the agency's "overriding statutory obligation" according to two Attorney General Opinions from 1997 and 2002.

It is difficult to understand how funding a list of long deferred hatchery repairs addresses the economic challenges facing Oregon when our wild salmonids are in crisis and this particular funding does nothing - absolutely nothing- to solve this conservation crisis. In fact, the vast weight of scientific research assures us that hatchery investments only contribute to the further stress and decline of wild salmonids.

Nothing in this package demonstrates that these projects are consistent with the mission of the ODFW to protect native fish. Nothing in this package demonstrates that these particular projects address the multitude of conservation needs that ODFW faces to protect and recover endangered salmon, steelhead and trout. There is no evidence that ODFW has consulted with federal agencies and regional salmon conservation organizations to determine if these expenditures are priorities for the many watersheds and wild species at risk from poor hatchery operations and practices.

The Native Fish Society urges the Legislature to consider a different set of projects to fund under your fast-moving and ambitious effort to stimulate Oregon's economy. For example, ODFW could propose to fund the following:

1. Land Acquisition. It would be better to spend that money on wild salmonid and wildlife habitat. Land conservancies have long lists of key property acquisitions waiting for funding only. This type of expense would provide real money and work for realtors, land surveyors, banks and land owners in Oregon.
2. Jobs in the Woods. Oregon should invest in its people by funding employment re-training programs that give people who like outdoor work the skills they need to restore habitat or help landowners with private projects that have public benefits.
3. Invasive Species Inspection Stations at the Borders. ODFW proposed to spend \$2.8 million to construct inspection stations at the southern and eastern borders to meet the threat of invasive species entering Oregon on commercial and recreation vehicles and boats. The proposal called for general fund dollars which were denied in the Governors Recommended Budget. These inspection stations are a critical need for Oregon in order to protect our agricultural and forest industry, water-based infrastructure and native fish and wildlife communities.
4. Fish Passage Barriers. The Oregon Plan for Salmon and Watersheds identified barriers to fish migration as a major problem for wild salmonid productivity. Barriers to fish passage exist on logging roads as well as major state and county roads throughout Oregon. The amount of money Oregon has committed to addressing this fundamental infrastructural problem for salmon recovery

has been paltry. The inventory has been conducted, the high priorities have been noted, construction design has been completed in many cases, and these high priority barriers to salmonid migration simply await money to fund the work – work that can be carried out by Oregon companies, watershed councils and volunteers.

These are but a few examples of other projects that deserve consideration for inclusion for funding that might stimulate Oregon's economy and not further erode Oregon's ability to protect and restore its wild salmon legacy. Hatchery funding, particularly if it is destined for routine maintenance, holds little long term value for the public, for jobs and actually perpetuates harmful management practices detrimental to native species

We realize that we are weighing in late in the process, but we feel it is our duty to all Oregonians to weigh in on this fast moving, ambitious and well-meaning effort to make sure the Legislative decision makers are well aware of the choices you have before you – to fund hatcheries to nowhere – or invest in Oregon's people and their ability to protect our wild salmon and wildlife legacy

Sincerely yours,

David Moskowitz, Confluence Consulting
On behalf of the Native Fish Society

cc: everyone