



Testimony by David A. Moskowitz

Executive Director, The Conservation Angler

Opposing House HB 3016

The Conservation Angler is a wild fish and rivers advocacy organization dedicated to the restoration and protection of wild fish resources in the Pacific Northwest. The Conservation Angler is opposed to the funding proposal in HB 3016 for continued hatchery operations for non-native hatchery summer steelhead in the Upper Willamette River, specifically in the Santiam River basin.

There are five reasons why this is a bad idea:

1. Summer Steelhead were never present above Willamette Falls – historically speaking. Willamette Falls, before the construction of the Dam and Fishway, was a passage barrier to summer steelhead, fall chinook and Coho salmon. For this reason, NOAA Fisheries has serious concerns about the use of the Lower Columbia River hatchery summer steelhead stock (known as the “Skamania Stock”) in basins outside the Lower Columbia – including Puget Sound streams in Washington and the Upper Willamette in Oregon.
2. The US Army Corps of Engineers (Corps) stopped funding the hatchery production of summer steelhead in response to legal challenges regarding the lack of federal authority to continue the collection, raising and release of hatchery summer steelhead based on their impact on ESA-listed spring chinook and winter steelhead.
3. NOAA Fisheries recent National Environmental Policy Act (NEPA) environmental impact statement (EIS) did not properly notice nor allow public analysis and comment on the Hatchery Genetic Management Plans (HGMP) on hatchery summer steelhead activities submitted by Oregon Department of Fish and Wildlife (ODFW) published on March 15, 2018. ODFW has not received approval for collecting, raising and releasing non-native hatchery summer steelhead under NOAA’s Final EIS for Upper Willamette River Basin hatchery activities.
4. Mitigation for the Willamette Valley Project, particularly the mitigation aimed at replacing lost fish habitat, lost fish and lost fisheries, is failing generally and should be reconsidered in a holistic manner by the Corps and Oregon.
5. The scientific evidence detailing the adverse impacts of hatchery summer steelhead production in the Upper Willamette River (and in the Clackamas River) is extensive, consistent and well accepted. Recent published work concluding that the removal of hatchery summer steelhead from the Clackamas River had no effect on wild winter steelhead is based on multiple inaccurate assumptions undermining their conclusions.

These comments are just the overview of serious problems associated with the operation of a hatchery program using non-native, out-of-Distinct Population Segment hatchery summer steelhead to support consumptive fisheries in the Upper Willamette Valley. We will post materials supporting our comments on the Committee website.

Thank you for the opportunity to comment on this measure.