



The League of Women Voters of Oregon is a 102-year-old grassroots nonpartisan political organization that encourages informed and active participation in government. We envision informed Oregonians participating in a fully accessible, responsive, and transparent government to achieve the common good. LWVOR Legislative Action is based on advocacy positions formed through studies and member consensus. The League never supports or opposes any candidate or political party.

February 7, 2022

To: [House Committee on Environment and Natural Resources](#)  
[Rep. Pam Marsh](#), Chair  
[Rep. Zach Hudson](#) and [Rep. David Brock Smith](#), Vice Chairs  
Members of the Subcommittee

Re: [HB 4148](#) - Establishes a new removal/fill credit program with limited sideboards - **OPPOSE**

The League of Women Voters of Oregon believes that water is a resource that should be managed for the benefit of the public and as sustainable habitat for all life forms. The League supports Oregon state policies and statutes that promote comprehensive long-range planning for conservation and management of ground and surface water and the improvement of water quality. The League believes that the interdependence of land use planning and water planning must be recognized and required at all levels of government. Our positions also recognize the need to manage our natural resources as interrelated parts of life-supporting ecosystems.

From the League of Women Voters of Oregon water study "[Water in Oregon—Not a Drop to Waste](#):"

*Wetlands are considered "waters of the state" and are defined by soils, vegetation, and hydrology. Oregon, like the federal government, is committed to a goal of "no-net-loss" of wetlands. Mitigation is required if wetland loss is deemed unavoidable.*


League members have been engaged in wetlands issues and in the state's removal/fill program since its inception. In 1987 we worked on and supported a bill for a pilot project to establish wetland mitigation banks to be overseen by State Lands. Members have served on a Technical Advisory Committee for the Dept. of State Lands removal/fill program and participated in recent "assumption" discussions. Wetlands help clean water and provide some protection from flooding. **It is with this background that we provide comments and OPPOSE HB 4148.**


The League supported the Oregon Watershed Enhancement Board and the funding from the lottery to address just the issue brought by this bill—saving Oregon's iconic salmon in "the Oregon Way" by providing opportunities for private landowners to assist in a program with specific sideboards that benefit both the salmon and the property owner. As stated above, we have supported a wetlands mitigation bank program—so long as the bank is near the affected area needed for removal and fill. This bill seems to duplicate some programs while reducing the oversight needed not only for the property owner, but neighbors. Section 3(4) would allow credits to be given far from a development project, undermining the concept of mitigation banking. And Section 3 (5) removes the requirement for a removal/fill permit—a permit that provides sideboards for such projects.

There are several other deficiencies in this program as described in HB 4148. Among them is no clear opportunity for the public to comment, either to support or express concern about any project. It is unclear that there is any metric to assure that a project would truly benefit salmon.

We appreciate the sponsor's recognition that our salmon need help. And that private landowners have a role to play. We believe that our current programs provide both those benefits, and **we ask that you not move this bill forward this session.**

Thank you for the opportunity to discuss this legislation.

  
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LWVOR President

  
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LWVOR Natural Resources Coordinator

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