



American Fisheries Society Oregon Chapter

OR Chapter AFS: PO Box 8062 Portland, OR 97207-8062 www.orafs.org

Date: April 4, 2023

RE: OREGON CHAPTER OF THE AMERICAN FISHERIES SOCIETY OPPOSITION TO HOUSE BILL 2206 RELATING TO CREATION OF CREDITS FOR THE RESTORATION OF SALMON HABITAT

Chair Rep. Helm and Members of the House Committee of Agriculture, Land Use, Natural Resources, and Water

The Oregon Chapter of the American Fisheries Society (ORAFS) comprises over 500 fisheries and aquatics science professionals from federal, state, and tribal agencies, colleges and universities, diverse private employers, college students, and retirees. ORAFS was established in 1964 as a chapter of the American Fisheries Society. Our mission is to improve the conservation and sustainability of Oregon fishery resources and their aquatic ecosystems for long-term public benefit by advancing science, education and public discourse concerning fisheries and aquatic science and by promoting the development of fisheries professionals.

ORAFS members are concerned with HB 2206 and the proposed -4 amendment for three primary reasons.

- 1) **Existing functional habitat replaced by mitigation habitat.** This bill would allow the replacement of native functional habitat with constructed habitat. Constructed habitats lack the complex physical processes that create shelter, food, and other resources that contribute to individual native salmonid survival and population growth. Salmon in the Coos River and Coquille River are negatively affected by historical and contemporary land use practices that have led to habitat degradation. The further destruction of remaining native habitat will imperil sensitive populations.
- 2) **Available voluntary habitat restoration programs.** There are existing voluntary habitat restoration programs for enhancing salmonid habitat. These programs provide funding and typically only require the landowner to be amenable to the project and to maintain the project as implemented. Entities that violate removal-fill or water quality laws may be required to contribute money to habitat restoration organizations as restitution. The Department of State Lands also already administers a habitat mitigation and banking program to offset removal-fill impacts.
- 3) **Mitigation credit values are unlikely to be sufficient to fund quality habitat restoration.** The design, permitting, and implementation costs for most habitat restoration projects often exceed \$100,000 depending on project complexity and scale. The bill lacks specificity on how salmon mitigation credits will be valued and what if the credit values are insufficient to implement habitat restoration projects. A likely outcome is that the mitigation credits will only be sufficient for implementation of small, inferior projects that do not compensate for the lost functions and values associated with the destroyed native habitat.

Thank you for the opportunity to submit our opposition to HB 2206 and -4 amendment. ORAFS is in support of legislation that provides support for private landowners who are interested in implementing voluntary habitat restoration. Supplemental funding for existing habitat restoration programs, bolstering funding for conservation easements, and expanding habitat protection are three suggestions for restoring salmon habitat in the Coos and Coquille watersheds, and more broadly, in Oregon's watersheds.

Respectfully,

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