



February 14, 2024

TO: House Committee on Agriculture, Land Use, Natural Resources, and Water

RE: Comments in opposition to HB 4106

Dear Chair Helm, Vice-Chair Hartman, Vice-Chair Owens, and Members of the Committee,

Native Fish Society¹ opposes HB 4106 and any effort to undermine conservation-minded management of Oregon's state forests.

Oregon's state forests cover broad swaths of the state, particularly in Oregon's northern Coast Range Mountains. This landscape supports a diversity of ecosystems and is key habitat for wild native fish including salmon and steelhead including Endangered Species Act-listed coho salmon.

These rivers should be wild fish producing powerhouses. Undammed and close to the ocean, these watersheds contain far fewer of the obstacles that have depressed salmon populations elsewhere. After being listed under the ESA, Oregon Coast coho have seen some rebound due to better management of fisheries and hatchery programs. But one major impediment remains to recovering Oregon Coast coho salmon as identified by the National Marine Fisheries Service: the loss of adequate habitat, primarily driven by impacts from logging.

HB 4106 will require the state to manage forests to maximize profits at the expense of much needed conservation measures that will help recover threatened coho salmon. It will take us backward to more landslides, more sedimentation of aquatic ecosystems, less large wood delivery to streams, and the destruction of the habitats our wild and threatened fish require.

Heavily forested watersheds can grow trees up to 500 or even 1000 years old. Western Oregon, Washington, and California salmon streams are built on this architecture of large woody debris. An estimated 50 percent of instream large wood comes from naturally occurring landslides on forested slopes.

¹ The Native Fish Society is a registered 501(c)(3) nonprofit with a mission to restore abundant wild fish, free-flowing rivers, and thriving local communities across Oregon and the Pacific Northwest.

Unfortunately, a clearcut landslide dumps massive amounts of sediment and, unsurprisingly, very little wood into rivers. Landslides on clearcut slopes are much larger and more frequent than slides on forested slopes. In fact, studies show that landslides occur up to 24 times more frequently after an area has been logged. Moreover, the sediment loads dumped into streams by a clearcut landslide often channelize rivers, impair water quality and either wipe-out or bury existing logjams.

Human-caused landslides on clearcut slopes destroy spawning habitat by smothering spawning gravel with fine sediment. Sedimentation also reduces the available rearing space for juvenile salmonids by burying cobble and filling rearing pools. When sediment fills pools and creates broader, shallower channels, it deprives salmonids of vital overwintering habitat, disrupts feeding and rearing, and exacerbates stream temperature problems. By entombing juvenile salmon and steelhead embryos, this activity prevents the recovery of threatened species.

HB 4160 disrupts the years-long efforts of the state, federal agencies, and conservation interests to establish adequate, science-based conservation measures in a Habitat Conservation Plan (HCP).

The lack of an HCP was one of the reasons Native Fish Society—along with our partners at the Center for Biological Diversity, Pacific Coast Federation of Fishermen's Associations, Institute for Fisheries Resources, and Cascadia Wildlands—filed suit against the Oregon Department of Forestry in 2018 for the ongoing harm to threatened Oregon Coast coho salmon from steep slope logging on the state's public forests.

Establishing and implementing an HCP is required under federal law. HB 4106 will create a legal quagmire for the Department of Forestry and threaten the implementation of the critical, science-based conservation measures outlined in the HCP such as expanded stream buffers that are necessary to restore habitat for wild fish and minimize landslides on logged slopes.

Native Fish Society urges you to oppose HB 4106 and ensure that threatened and endangered species like Oregon Coast coho salmon can recover and thrive.

Sincerely,



Jennifer Fairbrother

Legislative & Policy Director