



February 20, 2025

Senator Sollman, Chair
Senator Brock Smith, Vice-Chair
Senate Committee on Energy and the Environment

Re: NFS Opposes 221-3 and urges no further consideration by the Committee

Chair Sollman, Vice-Chair Brock Smith, and Members of the Committee,

Native Fish Society¹ agrees that fall Chinook salmon are experiencing a crisis in the Coquille watershed, but we do not endorse state investment in salmonid incubation boxes (aka hatchboxes) at this time. Any use of hatchboxes in Coos county should comply with Oregon Department of Fish and Wildlife's Coastal Multispecies Management Plan (CMP), hatchery genetic management plans, and the Coquille Fall Chinook Conservation Hatchery Program – Operational Plan.

Generally, hatchboxes have the following problems:

- 1) Negative impacts to wild fish populations—There is an overwhelming scientific consensus that hatchery fish have a myriad of direct, negative consequences for wild fish including through competition and genetic (domestication) impacts. Hatchboxes in particular increase risks to wild populations as any fish that survive to adulthood (which is very few) return to Oregon's rivers, not fish hatcheries, where they spawn with wild fish. Juvenile fish from hatchboxes have been found to impact their wild counterparts by competing for juvenile rearing habitats and resources.
- 2) Fail to contribute to sustaining or improving fisheries—Fish raised in hatchboxes are not marked (they do not have the adipose fin removed). In most fisheries, only marked fish are allowed to be retained for harvest while unmarked fish must be released.
- 3) Significantly complicate the agency's management of wild and hatchery fish populations—The state is obligated to meet the mandates of court orders, agreements, and management plans that dictate the percentage of hatchery-origin fish (pHOS) that spawn

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.



with wild fish. Marking hatchery fish to distinguish them from wild fish is a critical management tool for monitoring and responding to key conservation metrics like pHOS.

- 4) Divert departmental resources—ODFW needs to focus available, limited funds on addressing the factors limiting the recovery of wild populations—Habitat, Hatcheries, Harvest, Hydropower, and Heat (climate change).

SB 221-3 directs the department to undertake a hatchbox program in Coos County.

The language of the bill fails to provide any sideboards on the proposed hatchbox program. Verbal testimony at the committee's hearing on the bill on February 19, 2025 revealed that hatchboxes are already being deployed in Coos County, making this bill unnecessary. Specific to the use of hatchboxes in Coos County:

- 1) Hatchboxes are unlikely to be an effective means of recovering fall Chinook in the Coquille watershed. As ODFW pointed out in verbal testimony at the committee hearing on February 19, 2025, egg-to-fry survival (the goal of hatchbox use) is not a factor limiting wild fall Chinook populations.
- 2) The CMP currently allows for the use of hatchboxes only for fall Chinook and limits the size of any hatchbox program in Coos County to a maximum of 100,000 unfed fry (max of 50,000 in each of the north fork and south fork Coquille River). The broad nature of the language of SB 221-3 creates confusion as to whether hatchbox programs in Coos County would need to operate within the confines of the existing management plan. For example, would SB 221-3 allow for hatchboxes for other species not currently authorized in the CMP? Would SB 221-3 allow for a fall Chinook hatchbox program that exceeds the current 100,000 unfed fry maximum in the CMP?
- 3) Hatchboxes are not included in the Coquille Fall Chinook Conservation Hatchery Program – Operational Plan. The CMP does state: “Unfed fry releases may still be used in these SMUs if it is determined that there is a conservation need for such releases.” However, if ODFW has made such a determination, it has not been made public or integrated into the conservation hatchery program operation plan or CMP. Further, such a determination should operate within the existing limitations of the CMP.
- 4) We have ongoing questions about what exactly is currently taking place regarding hatchboxes in Coos County. As previously mentioned, we have heard in verbal testimony that hatchboxes are currently being deployed to research their effectiveness in the recovery of fall Chinook, but no plans or information on this program has been made publicly available for



review and/or comment. Without this information, it is impossible to know what will be accomplished by SB 221-3 and the associated funding.

- 5) We also question how the \$470,000 fiscal for this bill will be utilized. If hatchboxes are such an inexpensive technology compared to hatchery rearing, as claimed in some verbal testimony, then how does the cost of this program compare to the cost of rearing a similar number of fish in the existing hatchery programs?

We must address the root causes of wild fish decline in the Coquille watershed and throughout the state. This means making strategic investments in addressing the key factors limiting wild fish populations like predation by smallmouth bass in the Coquille. To that end, we encourage committee members to consider supporting programs like those proposed in SB 222-1 that target efforts to monitor, suppress, and find long-term solutions for smallmouth bass predation in Oregon's coastal watersheds.

For these reasons, we urge the committee to oppose SB 221-3 and give it no further consideration.

Sincerely,

Jennifer Fairbrother
Legislative & Policy Director