



April 1, 2025

Senator Frederick, Co-Chair

Representative Levy, Co-Chair

Members of the Joint Committee On Ways and Means Subcommittee On Natural Resources

Re: House Bill 5009 pertaining to the Oregon Department of Fish & Wildlife Budget

Co-Chair Frederick, Co-Chair Levy, and Members of the Ways & Means Natural Resources Subcommittee

The Native Fish Society¹ thanks you for the opportunity to submit testimony on HB 5009 pertaining to the Oregon Department of Fish & Wildlife Budget Oregon Department of Fish and Wildlife (ODFW). While we acknowledge the need for increased funding to support ODFW's vital work, we believe it is imperative to address the agency's current budget allocation to ensure that these funds are utilized in a manner that best serves its core mission: the conservation and enhancement of Oregon's fish and wildlife resources.

RECOMMENDATIONS

We respectfully recommend the legislature pursue the following actions:

- 1) Direct ODFW to develop and implement a science-based strategic transition framework to prioritize watersheds for management focused on wild fish production rather than hatchery fish production.**
 - Evaluate watersheds and wild fish populations for their climate resilience and current contribution to fisheries, beginning along the coast.
 - Conduct an analysis of the approach successfully being implemented to recover Oregon Coast Coho salmon populations, which included developing sustainable fisheries, investing in habitat restoration, and shifting away from widespread coho hatchery releases (a 98% reduction).
 - Prioritize watersheds on the potential to support abundant wild fish populations in the near and long term. Detail investment priorities for habitat restoration, barrier removal, and other actions that support wild fish abundance for top watersheds.

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.

- Produce a report detailing the findings and actionable recommendations for implementation in the short and long term.

2) Pause investment in Rock Creek Hatchery and analyze the best course of action for available funds. The legislature should:

- Determine the funding needs of Rock Creek Hatchery immediately and over the long term if the facility is rebuilt.
- Compile the funding sources available for Rock Creek Hatchery immediately and long term.
- Produce a report detailing the pros and cons of allocating existing funds and future funds for Rock Creek and whether those investments would be better directed towards other ODFW projects. If the latter, undertake legislation to repurpose existing funds.

3) Restore \$1.9 million in funding for vital research and monitoring positions to ensure the department can sustainably manage harvest and non-harvest fisheries and take conservation action to maintain sustainable populations of wild fish that can support fisheries. These include the following programs and positions proposed for elimination in Package 070 Revenue Reductions in the Governor's Recommended Budget²:

1. Adult Salmon and Steelhead Surveys: \$1,019,432, 5.0 FTE

The Oregon Adult Salmonid Inventory and Sampling (OASIS) Project is critical to monitoring populations of salmon and steelhead in Oregon's coastal and lower Columbia rivers. Loss of this funding will impact ODFW's ability to sustainably manage fisheries and conserve populations.

2. Fish Research Evaluation, Data, and Decision Support: \$332,464, 1.0 FTE The abolishment of position 2325034 will remove the Department's ability to collect and manage stream temperature data, which is necessary to understand and reduce the effects of climate change on fish populations and make management decisions to reduce those impacts to fish and fisheries.

3. Life Cycle Monitoring Program: \$301,805, 1.0 FTE

The abolishment of position 2020112 will impact the ability to monitor long-term watershed restoration benefits and the ability to verify the accuracy of decisions around coastal coho harvest (which may reduce the frequency of holding these fisheries).

² Governor's Recommended Budget, ODFW 2025-2027 Biennium, 070 Revenue Reductions, page 439-440 available at:

https://www.dfw.state.or.us/agency/budget/docs/25-27/2025-27%20GRB_ODFW%20635.pdf

4. Coastal Chinook Research and Monitoring Project: \$157,881 1.0 FTE

Reduces General Fund from three positions and replaces with federal funding from NOAA-Pacific Salmon Commission. General Fund reduction would eliminate flexibility around research and monitoring of Coastal Chinook salmon. Federal funds for this program are tied to annual congressional appropriation decisions which could be reduced in future years. Program is a core need for providing information needed to manage Chinook fisheries in Oregon coastal rivers and the ocean.³

5. John Day Chinook Escapement: \$257,665, 1 FTE

Limits the agency's ability to assess the impact of the hydroelectric system along the Columbia River and the Snake River and provide fishery opportunity.

THE UNSUSTAINABLE PARADIGM OF HATCHERY-CENTRIC MANAGEMENT AND THE NECESSITY FOR STRATEGIC PRIORITIZATION

There are two pieces to the hatchery system:

- 1) Hatchery facilities—the infrastructure like buildings, pumps, raceways, etc.—that are used to produce hatchery fish.
 - a) There are 14 state-owned hatchery facilities. There are an additional 18 federally owned hatcheries and 1 hatchery owned by Portland General Electric.
 - b) Primarily funded through bonding authority in the Major Construction and Acquisition category in the ODFW budget with some maintenance funding through other expenditure categories like Capital Improvements.
- 2) Hatchery programs—the specific types (aka stocks) of fish produced (trout, spring Chinook, fall Chinook, coho, winter steelhead, summer steelhead) for outplanting in specific river systems.
 - a) Individual hatcheries often produce multiple stocks of hatchery fish for planting within the basin in which the facility is located or at locations out of basin.
 - b) Primarily funded through the Hatchery Management category within the Fish Division in the ODFW budget.

ODFW's budget is disproportionately allocated towards hatchery fish production, a model that is both financially and ecologically unsustainable. This imbalance in the department's expenditures is evident in the fact that hatchery program costs are nearly equal to the entire budget of the ODFW Wildlife Division and exceed expenditures for all other categories.

In the 2025-2027 GRB, the department is seeking \$20 million in bonding authority for hatchery facility maintenance and upgrades. **Spending on hatchery programs and infrastructure combined comprises nearly 20% of the department's entire budget as proposed by the GRB.**

³ See GRB, page 130

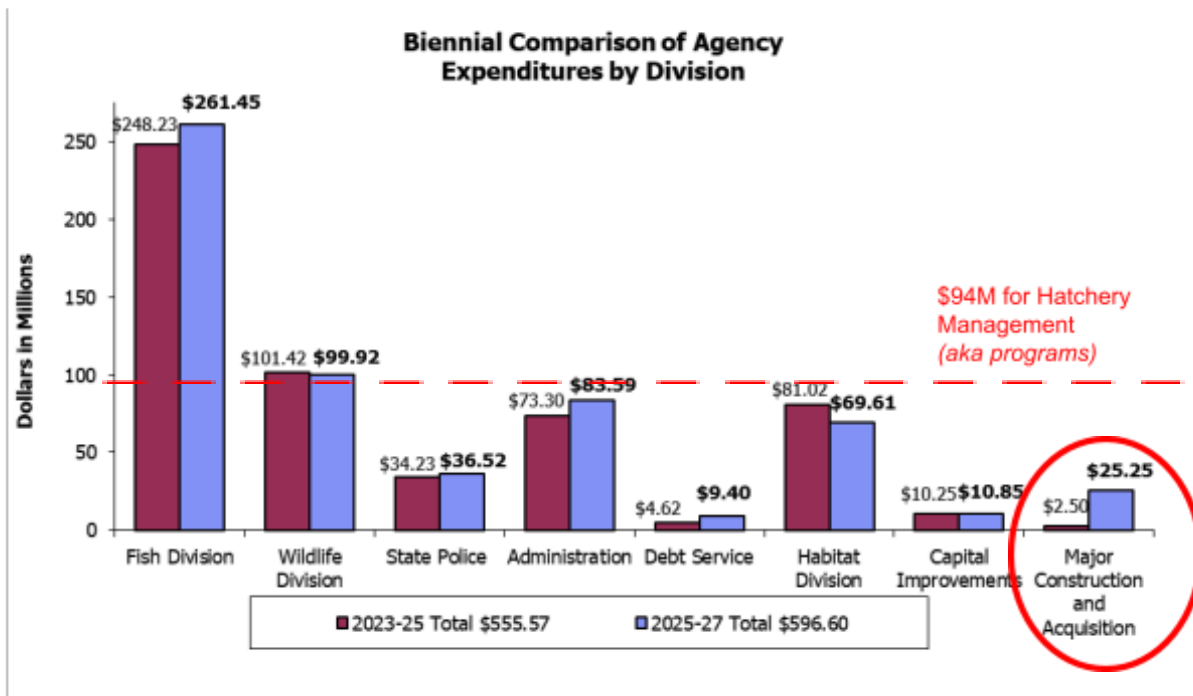


Figure Citation: Governor's Recommended Budget, ODFW 2025-2027 Biennium, page 11 available at: https://www.dfw.state.or.us/agency/budget/docs/25-27/2025-27%20GRB_ODFW%20635.pdf

This spending does not include the necessary (and often underfunded) expense of suitably monitoring wild and hatchery fish in order to conduct sustainable harvest fisheries and make adaptive management changes to hatchery programs to reduce negative impacts to wild populations.

The agency is also facing revenue shortfalls⁴ necessitating \$8.8 million in expenditure cuts to the 2025-2027 budget.⁵ Of this, \$2 million is proposed to be cut from Hatchery Management, an approximately 2% decrease in hatchery program spending. As proposed in the GRB, these cuts would apply to programs and operations associated with Rock Creek Hatchery and Salmon River Hatchery.

Furthermore, the proposed budget includes \$1.9 million in cuts to critical monitoring programs. Before allocating additional funds to restore hatchery management reductions, a thorough examination of these monitoring cuts is essential to determine whether restoring funding for monitoring should take precedence over restoring funding for hatchery programs.

⁴ This assumes that license fees will be increased as requested in HB 2342 available at: <https://olis.oregonlegislature.gov/liz/2025R1/Measures/Overview/HB2342>

⁵ Governor's Recommended Budget, ODFW 2025-2027 Biennium, page 439-440 available at: https://www.dfw.state.or.us/agency/budget/docs/25-27/2025-27%20GRB_ODFW%20635.pdf

HATCHERY FACILITY RESILIENCY ANALYSIS

Acknowledging the unsustainable nature of hatchery facility funding, ODFW received a legislative directive and companion funding in 2023 to assess the state-owned hatchery infrastructure to help inform decisions on where to prioritize limited funds. This analysis included comprehensive third-party reports assessing economic contribution, climate resiliency, and deferred maintenance needs related to each hatchery facility.⁶ **The reports revealed a staggering \$230+ million in deferred maintenance for state-owned facilities.** It also illuminated the growing impacts of climate change on the ability of the existing hatchery infrastructure to successfully produce different types of fish.

The economic analysis illuminated a marked divergence in the cost of producing resident trout (\$6.21/trout harvested) versus the cost of producing various salmon and steelhead (up to \$438/summer steelhead harvested).

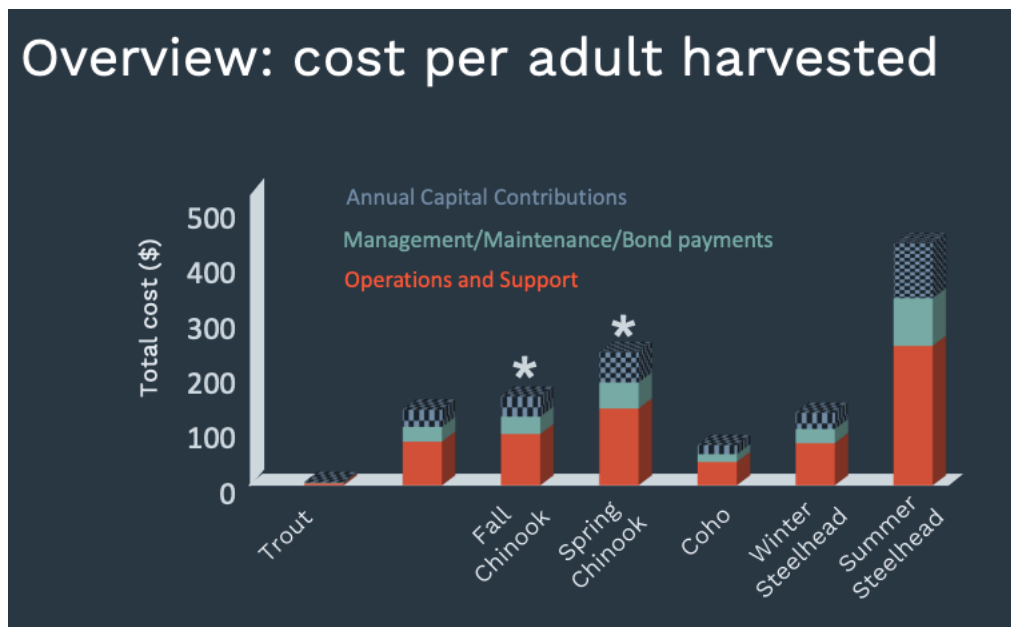


Figure Citation: Fish and Wildlife Commission Meeting, February 14, 2025, Directors Report, "Hatchery Resiliency Project Update" presented by Dr. Shaun Clements, Interim Legislative Director, Slide 11; available at: https://www.dfw.state.or.us/agency/commission/minutes/25/02_Feb/Directors%20Report_Hatchery%20Resiliency%20Project%20Update.pdf

⁶ All hatchery assessment reports are available at: <https://www.dfw.state.or.us/fish/hatchery/resilience.asp>

ZOOMING IN: HOW SB 512-2 FITS INTO THE OREGON HATCHERY SYSTEM

SB 512-2 seeks to restore approximately \$1 million in funds to maintain hatchery programs in the Umpqua basin associated with Rock Creek Hatchery. It then appropriates further funds of approximately \$400,000 to conduct several studies. **The result is that SB 512-2 will make the programs in the Umpqua basin even more costly than they previously were.**⁷

The bill also presupposes that the research will require the size of hatchery releases to remain unchanged, even though to our knowledge no study designs exist at this time. It is possible that such research could be done effectively at a smaller scale. It is also unlikely that two years of funding will be sufficient to complete research associated with salmon and steelhead as these fish spend several years in the marine environment before returning to freshwater.

At the same time, Rock Creek Hatchery on the North Umpqua River was destroyed in the 2020 wildfires and has limited ability to operate hatchery programs.

Through ODFW's hatchery facility assessment, Rock Creek Hatchery rated dead last when compared to the other state-owned hatcheries, based on its pre-fire performance data. It also revealed the high cost of the associated hatchery programs.

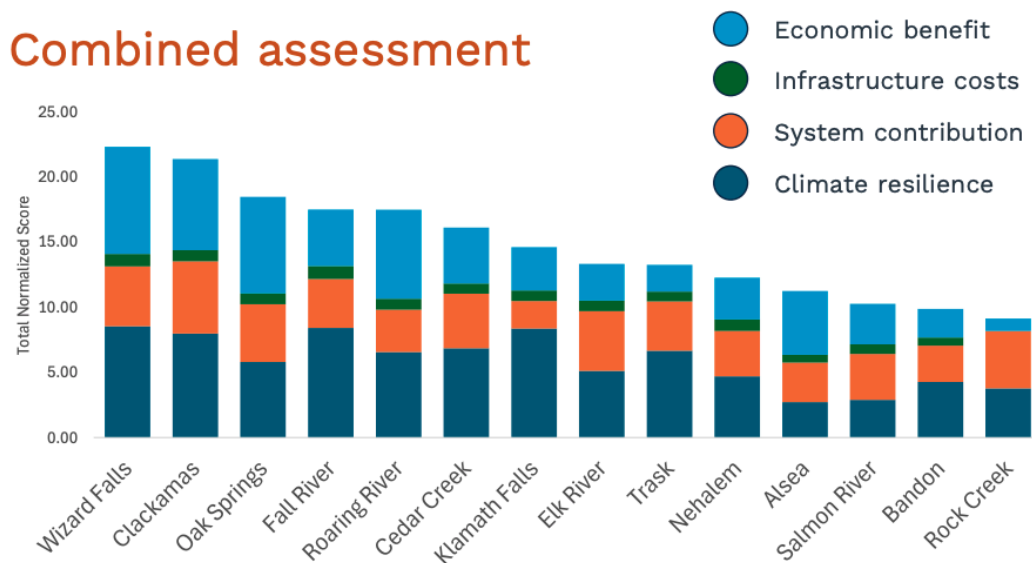


Figure Citation: Fish and Wildlife Commission Meeting, February 14, 2025, Directors Report, "Hatchery Resiliency Project Update" presented by Dr. Shaun Clements, Interim Legislative Director, Slide 33; available at: https://www.dfw.state.or.us/agency/commission/minutes/25/02_Feb/Directors%20Report_Hatchery%20Resiliency%20Project%20Update.pdf

⁷ We support research to address the root causes of wild fish declines. With regards to predation as proposed in SB 512-2, we recommend the legislature consider SB 222-1, a bill funding ODFW in monitoring and eradicating smallmouth bass in Oregon's coastal watersheds.

Hatchery	Fall		Spr/Sum		Winter		Summer		Fall		Spr/Sum		Winter		Summer	
	Trout	Chinook	Chinook	Coho	Steelhead	Steelhead	Trout	Chinook	Chinook	Coho	Steelhead	Steelhead	Trout	Chinook	Chinook	Coho
Alsea	6.97	--	--	--	21.35	--	7.00	--	--	--	133	--				
Bandon	19.25	44.54	--	--	21.00	--	198.29	229	--	--	146	--				
Cedar Creek	0.00	285.12	14.13	--	15.44	15.56	--	104	99	--	111	214				
Clackamas	0.00	--	31.40	14.43	84.41	173.83	--	--	525	43	182	399				
Elk River	11.20	18.00	--	--	59.98	--	15.85	311	--	--	253	--				
Klamath	10.67	--	0.00	--	--	--	10.11	--	--	--	--	--				
Nehalem	8.63	28.88	--	21.49	18.22	--	11.07	1,689	--	203	162	--				
Oak Springs	7.01	--	--	--	7.75	78.49	4.86	--	--	--	59	--				
Roaring River	5.82	--	--	--	9.69	4.67	3.23	--	--	--	127	175				
Salmon River	19.63	20.16	--	28.50	--	--	40.64	124	--	126	--	698				
Trask	0.00	27.72	34.42	206.22	28.65	--	--	61	293	221	84	--				
Wizard/Falls River	16.56	--	0.00	--	--	8.68	6.10	--	--	--	--	--				
Rock Creek	22.50	--	15.81	89.73	19.20	54.80	23.80	--	440	242	136	1,090				
All	9.04	24.44	18.67	21.81	20.95	18.08	6.21	161	241	73	132	438				

Notes: 1. Harvested adults are attributed catch in Oregon fisheries.

Figure Citation: Page III-4 of The Research Group, LLC. "State Owned Hatchery Economic Analysis Technical Report for the LOOKING AHEAD: Charting a Sustainable Future for Oregon's Hatchery System Project." Prepared for Oregon Department of Fish and Wildlife. November 2024. Available at: https://www.dfw.state.or.us/fish/hatchery/docs/resilience/The_Research_Group_Hatchery_Economic_Analysis.pdf

A strategic path forward should consider the conclusions made by the Oregon Governor's Recommended Budget and the Agency Request Budget approved by the Fish and Wildlife Commission. **It is reasonable for our state to take its time before allocating scarce tax dollars and resources to fund programs contrary to the Commission's and Governor's stated priorities.** Allocating over a million dollars to this project without evidence determining that it's the best course of action continues a "whack-a-mole" approach that has created an untenable status quo that isn't garnering the desired results for our fish populations, fisheries, or state coffers.

AN OPPORTUNITY FOR A MORE SUSTAINABLE PATH FORWARD

The \$1.4 million ask in SB 512-2 is just one piece of a much larger puzzle that deserves a more detailed examination. Oregon's natural resources and our residents' hard-earned tax dollars deserve a thoughtful approach as any funds allocated towards Rock Creek Hatchery will most certainly lead to more millions, if not tens of millions of dollars, to be sent towards the hatchery in the coming years.

This \$1.4 million ask is an opportunity for legislators and policymakers to study how ODFW's budget allocations can best serve our state and the agency's mission. With a deferred maintenance bill in the hundreds of millions, we know that addressing infrastructure needs at every facility is unsustainable. And at \$100+ million in hatchery programs every biennium (and growing), we need a

plan that provides for the best return on investment in general fund, federal fund, and license fee dollars.

Oregon needs a clear, science-based framework to prioritize funding allocations to outline which hatcheries and programs warrant immediate investment and what future investments will be sustainable for state hatchery facilities and programs, as well as our watersheds, to chart the best course forward. Without strategic prioritization, hatchery system spending will continue to cannibalize the agency's budget while wild fish populations and harvest opportunities continue to decline.

LEARNING FROM SUCCESS: THE OREGON COAST COHO MODEL

Oregon's iconic fish species, including Chinook, chum, and sockeye salmon, as well as steelhead, are facing critical declines. Many populations are listed as threatened or endangered under state and federal regulations. While external factors like climate change and land use contribute to these declines, ODFW holds a significant responsibility to implement effective strategies for species recovery and the development of resilient, abundant populations that support both healthy ecosystems and sustainable harvest opportunities. This includes managing the negative impacts of hatchery fish on the health of wild populations.

Oregon Coast coho salmon's recovery,⁸ a testament to the efficacy of targeted conservation and recovery efforts, provides a blueprint for Chinook and steelhead. Yet, this success was hard-won, achieved only after federal Endangered Species Act listing. We cannot afford to wait for other species to reach such critical lows. By acting now, we can implement proven strategies and avert the costly consequences of further decline.

A century of indiscriminate hatchery fish planting has yielded a starkly negative return on investment: collapsing wild fish populations and severely restricted harvest opportunities. Oregon's

⁸ **"Oregon's 20+ year effort to recover Oregon Coast coho is an example of what investing in conservation strategies can yield. The following graph shows wild Oregon Coast coho spawners. After a long and steep decline in spawners from the mid 1960's to the mid 1990's, in the past 15 years the agency has recorded the three largest spawner returns since surveys were started in 1950 (10-Year Outcome for Strategy 2). A combination of factors (past harvest and hatchery practices, habitat degradation, poor ocean productivity) was largely to blame for Oregon Coast coho being listed under the ESA in 1994. As Oregon took action (Oregon Plan for Salmon and Watersheds, 1997; Oregon Coast Coho Conservation Plan, 2007), significant investments were made in harvest and hatchery reform, habitat restoration, and monitoring to reverse declines and gauge success. Oregon Coast coho have now rebounded to the point where modest fisheries are allowed. Abundant wild Coast coho are expected to once again provide sustainable fisheries and give an economic boost to rural communities (Goal 2). Despite recent cyclical downturns due to ocean productivity, Oregon Coast coho are viable and on the way to delisting under the federal ESA (Goal 1)."**

From Governor's Recommended Budget, ODFW 2025-2027 Biennium, page 433, emphasis added; available at: https://www.dfw.state.or.us/agency/budget/docs/25-27/2025-27%20GRB_ODFW%20635.pdf

fish, watersheds, and people deserve thoughtful consideration towards the most sustainable plan with a good return on our investment.

Sincerely,

Jennifer Fairbrother
Legislative & Policy Director