



Representative Ken Helm, Co-Chair  
Representative Mark Owens, Co-Chair  
House Committee On Agriculture, Land Use, Natural Resources, and Water

April 22, 2025

**RE: Concerns with SB 221A – Request for Amendments to Establish Monitoring Requirements and Designate the Program as a Pilot**

Dear Co-Chair Helm, Co-Chair Owens, Vice-Chair McDonald, and Members of the Committee:

Thank you for the opportunity to provide comments on SB 221A. The Wild Salmon Center does not support the bill as drafted, and respectfully requests that the Committee either oppose SB 221A as written and continue the current fall Chinook hatchbox program under the existing conservation management plan, or amend the bill to align with existing management plans, include monitoring requirements, and designate the hatchbox effort as a pilot program.

The Wild Salmon Center is a nonprofit organization based in Oregon that works with local partners to protect and restore healthy forests and abundant clean water to support the strongest remaining runs of wild Pacific salmon. We use science to drive policy, lead planning processes, and support implementation of durable conservation protections. WSC focuses on protecting and conserving salmon strongholds on the Oregon Coast, where wild salmon populations are strong and diverse and where habitats are highly functioning and intact. Where investments in hatcheries are made, they must be grounded in science, aligned with ODFW's hatchery blueprint, supportive of Tribal and cultural values, and consistent with the Coastal Multi-species Conservation Management Plan.

WSC does not support SB 221A as drafted because a hatchbox program is already being implemented under the Coastal Multi-species Conservation Management Plan. We are concerned that any hatchbox program under this bill would be exempt from already adopted management plans, and the bill as drafted lacks the necessary monitoring and reporting requirements to evaluate the effectiveness of such a program.

- **A hatchbox program is already being implemented under “Research” of the Coastal Multispecies Conservation Management Plan (CMP)<sup>1</sup>.**

SB 221A would require the Oregon Department of Fish and Wildlife (ODFW) to “*encourage*” a hatchbox program for fall Chinook salmon in Coos County. However, a hatchbox program is already operating in the county under the “Research” component of the Coastal Multispecies Conservation and Management Plan (CMP). ODFW and the Coquille Indian Tribe are conducting research and monitoring to evaluate the effectiveness of this enhancement strategy. Given these existing efforts, the overall need for this legislation is unclear.

- **The proposed hatchbox program would be exempt from already adopted management plans.**

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<sup>1</sup>ODFW's Coastal Multispecies Conservation Management Plan  
[https://www.dfw.state.or.us/fish/crp/docs/coastal\\_multispecies/CMP\\_main\\_final.pdf](https://www.dfw.state.or.us/fish/crp/docs/coastal_multispecies/CMP_main_final.pdf)

Developed in 2014 by ODFW in collaboration with stakeholders from across the Oregon Coast, the CMP established science-based management guidelines for hatchery programs affecting multiple species, including fall Chinook salmon in Coos County. In 2010, ODFW adopted its Fish Hatchery Management Policy<sup>2</sup>, which guides current hatchery management statewide. The proposed hatchbox program would be exempt from these existing policies. By exempting the proposed hatchbox program from the existing policies, SB 221A could undermine established conservation measures and create potential conflicts for state agencies managing and protecting fall Chinook salmon in local watersheds.

- **SB 221A does not include monitoring requirements that would ensure the effectiveness and transparency of the hatchbox program.**

Monitoring both new and existing hatchbox programs is essential to evaluating their effectiveness. SB 221A does not include monitoring metrics that would provide critical information to properly assess the effectiveness of such a hatchbox program and increase transparency for stakeholders invested in the conservation and recovery of Coos County fish populations.

As a result of these concerns, WSC does not support SB 221A. However, we propose three changes that would substantially address our concerns with the bill.

1. **Align bill with previously adopted management plans:** As stated earlier, the proposed legislation does not align with ODFW's current management plans in Coos County. Ensuring alignment will allow fisheries managers to make sure the hatchbox programs are effective and do not compromise existing management.
2. **Include specific monitoring metrics:** Collecting and reporting this data will enable fisheries managers to properly assess the success of the hatchbox program and understand their potential long-term benefits. It will also provide greater transparency for stakeholders invested in the conservation and recovery of Coos County fish populations.
  - The number of eggs deployed in hatchboxes
  - The source and number of broodstock used
  - The number and location of deployed hatchboxes
  - The number of returning adult fish from hatchboxes

In addition to the standard monitoring of the program, this information should be reported on annually, in alignment with existing hatchery program summaries<sup>3</sup> that track other hatchery program metrics in Coos County.

3. **The legislation should be structured as a pilot program aligned with the lifecycle of fall Chinook salmon:** As currently written, SB 221A would establish a hatchbox program in Coos County without a sunset, allowing it to continue indefinitely—even if the program proves ineffective or has unintended negative impacts on other species in the watershed. Establishing the hatchbox program as a time-limited pilot program would increase transparency and provide an opportunity to assess the effectiveness of the program. Specifically, the program should be re-evaluated after six years, allowing for the return of three generations of fall Chinook to Coos

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<sup>2</sup> ODFW Fish Hatchery Management Policy  
[https://www.dfw.state.or.us/fish/hatchery/docs/hatchery\\_mgmt.pdf](https://www.dfw.state.or.us/fish/hatchery/docs/hatchery_mgmt.pdf)

<sup>3</sup> ODFW CMP Hatchery Program Summaries  
[https://www.dfw.state.or.us/fish/crp/docs/coastal\\_multispecies/CMP%20Hatchery%20Program%20Summaries%20\(2014-2021\).pdf](https://www.dfw.state.or.us/fish/crp/docs/coastal_multispecies/CMP%20Hatchery%20Program%20Summaries%20(2014-2021).pdf)

County watersheds. This timeline will provide a more complete understanding of the program's effectiveness and ecological impact.

WSC respectfully asks the House Committee on Agriculture, Land Use, Natural Resources, and Water to either oppose SB 221A as written and continue the current fall Chinook hatchbox program under the existing conservation management plan, or amend the bill to add monitoring metrics and designate the hatchbox effort as a six-year pilot program. Any amended version should align with the CMP, include adequate monitoring, and provide fisheries managers and the public with a clear understanding of the program's effectiveness, success, or failure.

Thank you for your time and consideration, and let me know if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'K. Blaine', with a stylized flourish at the end.

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