

**Independent
Multidisciplinary
Science Team
(IMST)**



State of Oregon

Robert M. Hughes
Nancy Molina
Carl Schreck
J. Alan Yeakley

c/o
Oregon State University
Department of Fisheries &
Wildlife
104 Nash Hall
Corvallis OR 97331-3803

541-737-6105
www.fsl.orst.edu/imst

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The Honorable Chris Edwards, Co-Chair
Natural Resources Subcommittee, Ways & Means
900 Court St. NE, S-405
Salem, Oregon 97301

The Honorable Ben Unger, Co-Chair
Natural Resources Subcommittee, Ways & Means
900 Court St. NE, H-377
Salem, Oregon 97301

Dear Sirs,

The Oregon Department of Environmental Quality's (ODEQ) proposal to develop a statewide biomonitoring program (as described in Water Quality Policy Option Package 122, Narrative (13-15)) is very important for the State's science-based decision making processes. This program will enhance the agency's capacity and capability to provide Oregon with much needed long-term, statewide biomonitoring data on the health and sustainability of Oregon streams, rivers, estuaries, and watersheds.

Since its inception in 1997 under ORS 541.914, the Independent Multidisciplinary Science Team (IMST) has repeatedly identified a chronic lack of adequate statewide monitoring and assessment of status and trends in fish populations and aquatic and riparian ecosystems. That information is needed for the State to document the overall successes and shortcomings of the Oregon Plan for Salmon and Watersheds as well as other management actions taken under the Forest Practices Act, the Agricultural Water Quality Management Program, and the implementation of ODEQ's water quality standards. To be scientifically sound, it is imperative that State's ecological monitoring programs produce data sets that are both as comprehensive and intensive enough to adequately represent regional and local patterns and to discriminate among anthropogenic and natural factors affecting resources. This information will aid state agencies making regional assessments, developing predictive models, improving regulatory criteria, and improving land and water restoration actions.

Biomonitoring is fundamentally different than more traditional chemical-based water quality monitoring. Biological response indicators focus on the outcome of overall ecosystem condition. ODEQ is uniquely situated to develop and manage a statewide biomonitoring program, and ODEQ scientists and managers have a proven track record at implementing such measures on a state-wide basis. Other Oregon natural resource agencies are restricted to specific land uses or resources (which can have limited

and non-overlapping ranges across the state). However, ODEQ's authority over surface water body condition across the entire state allows ODEQ to develop and manage a statistically and scientifically defensible biomonitoring program. That program can be integrated with other state, local, and federal agency programs, and can provide other state agencies with data ODEQ has collected and analyzed. It is also important to point out that no other state agency collects the macroinvertebrate and aquatic vertebrate, (including non-game fish, amphibians, and non-native, invasive species) data that ODEQ does. For example, the Oregon Department of Fish and Wildlife monitoring focuses on game fish and their habitats. Among the organisms sampled and monitored by ODEQ are key indicator species that can be used to identify early threats to water quality, either by their presence or absence in a stream reach. These threats to water quality do not just affect salmon and other aquatic organisms but can also present risks to human health through water and fish consumption or contact through recreational activities.

The IMST is a committed partner in the State's monitoring and assessment efforts, and as such, we would be pleased to provide you with additional information on how the State of Oregon and ODEQ can improve its natural resources monitoring and assessment capabilities. Biomonitoring programs similar to the one proposed by ODEQ are based on the US Environmental Protection Agency's methods and have been successfully established and implemented in Washington and California. We can also provide you with peer-review publications demonstrating the efficacy, cost effectiveness, and ecological and risk assessment information of such biomonitoring programs.

Sincerely,


Carl Schreck
IMST Co-Chair


Nancy Molina
IMST Co-Chair