

During testimony at this hearing several items of misinformation were presented. Below are contrary and/or comparative statements.

1. Mentioned was a sufficient fee to offset actual costs of administration for a mining permit. The spokesperson was a fish conservative. I would ask he consider equal consideration for sport fishing "permits". The current ODF&W budget projects a shortfall of \$32 million dollars. There is no short fall for mining interest. The proposed fee for mining permits is up to \$1,750.00 per site permit. Also required is a site specific GPS for the mining activity, a separate permit is required for any other locations. In all fairness, fishing license/permits should therefore cost at least \$2,500.00 and require the fisherman to fish only one GPS site for the entire season, or pay the costs for fishing in another location. Equal treatment for activities.
2. A purported "published" paper was offered to establish damages from suction dredging by the author. This is **NOT** a scientific study; this was a single person observed activity in a specific location. These biased opinion "papers" can be "published" in any form of local newsletter and are not subject to peer review or duplication to verify the findings. I offer numerous true scientific studies by State, Federal and true scientists that directly contradict the "published" papers content.
 - (a) 1994 Alaska U.S Army Corps of Engineers Special public notice 94-10.. effects of small suction dredges and hand operations were de minimus and do not require Army Corps permitting.
 - (b) 2004 Alaska District of Army Corps special public notice 2004-06 .. restated placer mining still have "de minimus impacts" on aquatic environment.
 - (c) 1994 Calif. Dept. Of Fish and Game - Environmental Impact report conclusion that suction dredge mining had a less than significant on the environment.
 - (d) 2012 Calif. Dept. Of Fish and Game - **court ordered** environmental impact report (costs \$1.5 million)... overall conclusion was impact from small scale dredges was less than significant in 56 of 60 factors reviewed.
 - (e) 2001 Siskiyou National Forest, Ore. .. draft impact report – suction Dredge Activities are less than significant.
 - (f) 2004 Clearwater National FOREST, Idaho.. The report stated " EPA generally supports the terms and conditions for dredging and we believe they are designed to protect fish habitat and seem to minimize the potential to damage stream channels and banks.", which supports a less than significant outcome.
 - (g) 2012 Wallowa-Whitman National Forest, Oregon.. FINAL Supplemental Environmental Impact Statement reached a conclusion that suction dredging has a less than significant impact on the environment..
 - (h) 2013 U.S. Environmental Protection Agency Biological Evaluation Small Suction Dredge Placer Mining in Idaho - reached a conclusion that suction dredge mining would have a less than significant impact on the environment..

Of particular interest:::please read...

- (i) Oregon Department of State Lands – “Observations suggest that placer mining activities conducted in the observed stream systems during the 1997 season did **not permanently modify physical habitat characteristics**” and “data gathered during the 1996,1997, and 1998 seasons lend credence to our assumption that **no more than minimal adverse effects are resulting from issuing Placer Mining General Authorization..**”

Additional list of historic reports that identify mining effects on fish survival:

- (a) Ward, H.B. 1938 - Rouge River, Or. Effects of Hydraulic Water cannon mining (*effects are magnitudes higher than modern small scale suction dredges*) “muddy water from placer operations in the Rouge River Drainage is not inimical to fish and fish life.” **“Hydraulic placer mining debris is just more stream sand and gravel. It is typically chemically inert and does not take oxygen from the stream or add toxic agents to the water.”**
- (b) 1992 Chugach National Forest, Alaska. Do not indicate any strong cumulative effects from multiple placer mining operations.
- (c) 1999 E.P.A. Royer et al.. report on performance of 10, 8, and 4” dredges concluded environmental impacts were less than significant.
- (d) 2003 Bayley (OSU) Siskiyou National Forest OR. Effects of suction and hydraulic mining in the Illinois subbasin concluded “The statistical analyses did not see that suction dredge mining has no effect on the three responses measured, but rather **any effect that may exist could not be detected at the commonly used Type I error rate of 0.05%.**”

The following is a list of other studies by name and year w/o details: all rebutt damages, or lists benefits caused by dredge action.

CH2M Hill 2002

Stern 1998

Harvey 1991

Neilsen 1994

Siskiyou National Forest 2001

American River Spawning Gravel Supplement 2010

American River Spawning gravel 2011

3. Final item for discussion: salmon mortality was contributed to habitat destruction from suction dredges. **This is pure supposition w/o any scientific study confirmation.**

I previously provided to all committee members in the 2015 session during hearings on SB 838 - a copy of the U. S. Department of Interior's Fish and Wildlife Biological report 82 (11.70) 1987 - COHO salmon spawning profile.

Under the "Mortality of Coho Salmon" section: factors responsible for losses are: predators, drying stream channels, and disease. Also listed are high water temperatures, pollution, lack of suitable food, and lists predators as other fish, garter snakes, American Dipper, **lampreys**, larger coho, cutthroat trout, steelhead, Dolly Varden (*bull trout*), squawfish, and sculpins. Birds listed are kingfishers, loons, mergansers, other birds and small mammals. Ocean predators are seals, sharks, sea lions, and other salmon.

Additionally, **fishing**, commercial and recreational are major factors in removal of **mature returning fish**. As a prior commercial fishing boat operator in Oregon (17 years), I also observed that excessive commercial bait fish harvest (herring and anchovie) plus varied ocean temperatures did greatly affect the salmon in the ocean. The ocean conditions are the single greatest factor on salmon populations. The only issue we can control is human salmon harvest and that would have a great impact on populations..

In this 40 plus page salmon spawning report there is not one mention of suction dredge mining as even a minor contributing factor to any loss in salmon populations. Again, a less than significant factor....

Please vote no on SB 1530.

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