



NATIVE FISH SOCIETY

Advancing the Recovery of Native, Wild Fish in Their Homewaters

Wednesday, March 29, 2017

Dear Respected Members of the Senate Environment and Natural Resources Committee,

I am writing to respectfully voice our opposition to the suction dredge mining provisions included in Senate Bill 644/House Bill 2106, which are inadequate for protecting sensitive and threatened populations of wild, native fish and their habitats across Oregon.

Native Fish Society feels strongly that the suction dredge mining provisions in SB 644/HB 2106 fail to meet the protections necessary for Oregon's iconic salmon, steelhead, trout and lamprey, and that adequate protections are more favorably represented in SB 3, which is currently being considered in the Senate. SB 3 will establish the long-term regulatory framework necessary to help protect sensitive native fish populations and their habitats, and has benefited from rigorous discussion and years of review by diverse stakeholders including the mining industry, state agencies, recreation-based businesses and scientists, among others.

We urge you to consider removing the repeal of the suction dredge mining moratorium from SB 644/HB 2106, or bring the protections included in SB3 in congruence with SB 644/HB 2106. The provisions in this omnibus mining bill related to suction dredge mining are significantly narrower in scope and provide less protections for clean water, native fish and sensitive habitats. The negative effects of suction dredge mining have been well documented, in which it has been shown that this practice can trap and kill aquatic insects, fish eggs and juvenile fish, negatively altering habitats.^{iii,iii} In addition, suction dredge mining can stir up legacy deposits of mercury left from historic mining operations, and put rearing juvenile salmon at risk from exposure.^{iv} A 2015 US Fish and Wildlife study reported that "fish metabolic processes are not effective at processing and eliminating methylmercury, and at certain tissue concentrations, methylmercury can negatively impact behavior, health and reproductive success."^v Failing to include adequate protections for Oregon's threatened and sensitive salmonids and lamprey will further contribute to the imperiled condition of these iconic species.

Based on the long legislative history of SB 3, which includes the collaborative processes utilized to refine the bill over multiple legislative sessions, we believe that SB 3 is the appropriate vehicle for establishing the regulatory framework necessary to reform suction dredge mining in Oregon. Thank you for the opportunity to provide comments.

Respectfully,

Jake Crawford
Southern Regional Manager



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Literature Referenced

ⁱ Harvey and Lisle. (1998). Effects of Suction Dredging on Streams: A review and an evaluation

ⁱⁱ Horizon Water and Environment (HWE). 2009. Suction Dredge Permitting Program. Literature review on the impacts of suction dredge mining in California.

<http://www.dfg.ca.gov/suctiondredge/Luzier>

ⁱⁱⁱ United States Fish and Wildlife Service (USFWS). 2012. Pacific Lamprey Fact Sheet.

^{iv} Marvin-DiPasquale, M., J. Agee, E. Kakouros, L.H. Kieu, J.A. Fleck, and C.N. Alpers. 2011. The Effects of Sediment and Mercury Mobilization in the South Yuba River and Humbug Creek Confluence Area, Nevada County, California: Concentrations, Speciation and Environmental Fate. Part 2: Laboratory Experiments. U.S. Geological Survey Open File Report 2010-1325B

^v Oregon Chapter American Fisheries Society (ORAFS). 2015. "Effects of Suction Dredge Mining on Oregon Fishes and Aquatic Habitat Supplemental Information."

^{vi} Oregon State Bureau of Land Management and Region 6 United States Forest Service.

"Northwest Forest Plan Aquatic Conservation Strategy: The Implementation of the Northwest Forest Plan Aquatic Conservation Strategy on BLM and FS-administered lands within the Oregon Coastal Coho ESU." Final Report, May 6, 2005.

http://www.dfw.state.or.us/fish/crp/docs/coastal_coho/reference/usfs-blm/blmusfsfinalreport.pdf

About Native Fish Society: Founded in 1995, the Native Fish Society utilizes the best-available science and our grassroots network of River Stewards to conserve and restore the Northwest's wild, native fish and safeguard their freshwater habitats. The Native Fish Society has 3,000 members and supports 89 volunteer River Stewards in Oregon, Washington, Western Idaho and Northern California.