



West Coast Seafood Processors Association
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April 10, 2017

House Committee on Agriculture and Natural Resources
hagmr.exhibits@oregonlegislature.gov
Oregon State Capitol
Salem, OR 97301

Re: Opposition to House Bill 3425

Dear Chairman Clem and Members of the Committee:

On behalf of the West Coast Seafood Processors Association (WCSPA), I am writing to oppose House Bill (HB) 3425. WCSPA represents shore-based seafood processors in California, Oregon, and Washington. Our members process most of the fish and shellfish delivered to shoreside plants on the West Coast. We provide healthy, sustainable seafood to consumers throughout the United States and employ hundreds of workers from Oregon's coastal communities. We strongly oppose the policy proposed in HB 3425 because it would diminish the cooperative relationship both the sport and commercial sectors have built with the Oregon Department of Fish and Wildlife (ODFW).

At a minimum, in addition to creating a significant potential for unintended consequences, HB 3425 raises too many questions that must be addressed prior to further consideration. At most, it fosters an "us vs. them" attitude among some of the state's constituents, who also are the primary stewards of our valued natural resources. This bill represents a large step away from the collaborative approach the state has taken towards natural resource management; moving away from collaboration is simply unacceptable.

Below are just a few of the more obvious questions that should be addressed prior to any further consideration of HB 3425:

- 1) Would HB 3425 encompass all fishery management decisions, including those that are developed for consistency with Federal and International laws (for example, in accordance with the International Pacific Halibut Commission and/or the U.S./Canada Pacific Hake Treaty)?
- 2) Allocation of Oregon's fishery resources are under the purview of the Oregon Fish and Wildlife Commission. Do the authors of this bill intend to remove or modify this responsibility?
- 3) Specifically, how would the state track how management decisions are made "proportional with revenues"? Would consideration be given to allowing commercial fishing in areas where it currently is not allowed, if appropriate, to better reflect that proportionality?
- 4) What data and methodology would be utilized to evaluate revenues, make accurate comparisons and draw conclusions that would be required under this bill? For example, how

would the state compare management decisions allowing a multi-million dollar commercial Dungeness crab fishery to proceed with management decisions allowing a free family fishing day on Oregon lakes?

- 5) How would all fees paid respectively by commercial and recreational fishermen be tracked and counted under this bill?
 - The Commercial Fish Fund currently funds commercial fishing activities; how would HB 3425 change this?
 - Do the authors of HB 3425 intend for federal tax revenues (Wallop-Breaux Funds) that come as grants to the state be counted? If so, the state should also count federal funds that support commercial fisheries, such as cost recovery fees and observer fees paid by Oregon fishermen as part of the groundfish trawl catch shares program.
- 6) Fishing seasons (time/area restrictions) can be established as a function of many factors, including the vulnerability of fish (ex., softshell crab, spawning shrimp, male lingcod guarding their nests), Endangered Species Act requirements, and tribal treaty fishing rights, among others. If this bill is enacted, how would future decisions about fishing seasons relate to the proportionality of revenues?
- 7) How would the policy proposed in HB 3425 affect tribal fisheries?

WCSPA continues to support and engage in the current process for allocating and managing Oregon's natural resources. The department has always worked well with its federal and tribal partners, in addition to a diverse number of stakeholders who are engaged in the process at many levels. Moreover, the state's current process for establishing its budget is rigorous, transparent, and collaborative; it provides a number of opportunities for public participation, input, and review of priorities. There is simply no need to establish additional policy that would determine priorities outside of this process.

HB 3425 is divisive and entirely inconsistent with the relationship the Oregon Department of Fish and Wildlife has worked for many years to build with its sport and commercial stakeholders. For all the reasons discussed above, we strongly oppose HB 3425 and urge the Committee to do so as well.

Thank you for your consideration of our comments regarding this important issue.

Sincerely,



Lori Steele, Executive Director

cc: Curt Melcher
Oregon Coastal Caucus