



# NATIVE FISH SOCIETY

*Advancing the Recovery of Native, Wild Fish in Their Homewaters*

Friday, February 17, 2017

Dear Chair Clem, Vice Chair McLain, and Respected Members of the House Ag and Natural Resources Committee,

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

Native Fish Society feels strongly that the suction dredge mining provisions in 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 reviewed in the Senate Environment and Natural Resources Committee. SB 3 will establish the long-term regulatory framework necessary to help protect sensitive native fish populations, 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 HB 2106, or bring the protections included in SB3 in congruence with HB 2106. In particular, HB 2106 fails to address the necessary protections for the federally listed as *Threatened* bull trout (*Salvelinus confluentus*). 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.<sup>i,ii,iii</sup> 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.<sup>iv</sup> 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.”<sup>v</sup> Failing to include protections for bull trout will further contribute to the imperiled condition of this threatened species.

Furthermore, HB 2106 does not protect the riparian areas in streams with sensitive fish populations. Suction dredge mining has been shown to degrade necessary streamside riparian habitats, which help maintain the integrity of aquatic streams by keeping them cool and clean, providing important habitat for insects and birds, contributing root strength for channel stability, and reducing nonpoint source pollution.<sup>vi</sup> Not including the 100 yard upland, or riparian, protections will put the cold, clean water salmonids need for migrating, spawning and rearing at risk.

For these reasons, we urge the respected members of the House Agriculture and Natural Resources Committee to wait for SB 3 to reach the House for further consideration. We believe that SB 3 is the appropriate vehicle for establishing the regulatory framework necessary to reform suction dredge mining in Oregon.

Respectfully,

Jake Crawford  
Southern Regional Manager



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## Literature Referenced

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

<sup>ii</sup> 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>

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

<sup>iv</sup> 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

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

<sup>vi</sup> 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](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 88 volunteer River Stewards in Oregon, Washington, Western Idaho and Northern California.