

March 20<sup>th</sup> 2019

Members of the House Natural Resource Committee  
900 Court Street NE  
Salem, OR 9730

**Re: Testimony in opposition to House Bill 2381, related to controlling populations of species that prey on salmon**

Chair Witt, Vice-Chair Gorsek Vice-Chair Sprenger and Honorable Members of the House Natural Resources Committee:

On behalf of Defenders of Wildlife's 33,000 members and supporters across Oregon, we submit the following comments on HB 2381. Defenders of Wildlife works to protect native and imperiled species and their habitat across the country. Salmon population recovery is one of our priorities in Oregon but we cannot support a bill that proposes a short term, scientifically questionable approach to salmon population recovery while creating an enormous exemption to the Oregon Endangered Species Act (ESA).

Salmon runs have declined and disappeared throughout the Salish Sea and Columbia Basin due to a variety of factors, the main one being ecological degradation of their habitat because of industrial and economic development. Salmon are an important prey species for several marine and avian species in the region, including the critically endangered Southern Resident Killer Whales (SRKWs). They are also indicators of healthy river and marine ecosystems – as habitats degrade and disappear, so does the salmon. We therefore recognize the need for taking a systematic, long-term approach to salmon population recovery in the region. However, this bill focuses on a narrow, scientifically questionable solution to salmon recovery.

Salmon decline cannot be pinned on individual species alone—whether they are pinnipeds, birds or other aquatic species. Oregon attempted it with cormorants and it backfired on us and collapsed a colony of a species<sup>1</sup>. Many factors have led to the decline in salmon population, including warming ocean temperatures, habitat loss caused by human activity, industrial development that pollutes water and creates barriers to salmon runs, and overharvesting. Removing natural predators to compensate for core issues that are human-caused is short-sighted and dangerous. We have limited understanding of how such a measure will impact the ecosystem overall – the target predator species most likely do not prey on salmon alone, they also eat other species and provide other ecosystem services, some of which we are still in the process of uncovering. It is a complex ecological web and without adequate research on the overall ecosystem implications of such a measure, such policies are just a flinch reaction to a deeper problem.

The language of the bill is also very vague and very broad. It gives us little to no understanding of the scope of target species and the discretion that Oregon Department of Fish and Wildlife will have to “cull” individuals of such species. But perhaps the biggest threat we identify is the enormous exemption it creates to the Oregon Endangered Species Act (ESA). Allowing the killing of individuals of protected species (that are listed or petitioned to be listed under the State ESA) is an archaic approach that defies core conservation principles. This sets an alarming precedent for the killing of protected species and represents a serious step back in the state's policy to protect its vulnerable natural resources.

HB 2381 does not serve the interest of salmon recovery and habitat restoration in Oregon. For effective and sustainable recovery of Oregon's salmon population, the state should focus its resources on restoring prime salmon habitat, removing barriers to salmon runs, and reducing pollution. Such recovery measures will take time to show its impact on salmon populations, which is why we should also concentrate on meeting immediate needs by increasing spill over dams, removing non-native species, removing non-functional dams and investing in improved hatchery programs. It will take a combination of short term and long-term measures to bring salmon population back from its exponential decline. HB 2381 is not a measure that will address either short-term or long-term goals without having adverse effects on its ecosystem. In conclusion, I urge you to consider the wellbeing of healthy ecosystems in Oregon for present and future generations of Oregonians and not support this bill further through the legislature.

Thank you for your time and consideration of these issues. I will be happy to answer any questions. Please contact me at [skamal@defenders.org](mailto:skamal@defenders.org)

Sincerely

A handwritten signature in black ink that reads "Sristi Kamal". The signature is written in a cursive, flowing style.

Sristi Kamal, Ph.D.  
Senior Representative  
Defenders or Wildlife  
Portland, Oregon

Reference:

<sup>1</sup> <https://www.courthousenews.com/oregon-feds-plan-to-save-salmon-by-killing-birds-backfired/>