



January 18, 2023

Representative Ken Helm, Chair
Representative Annessa Hartman, Vice-Chair
Representative Mark Owens, Vice-Chair
House Committee on Agriculture, Land Use, Natural Resources and Water

Re: Trout Unlimited opposes House Bill 2184 in current form

Dear Chair Helm, Vice Chairs Hartman and Owens, and Members of the Committee,

Trout Unlimited (“TU”) is a non-profit organization dedicated to the conservation of cold-water fish (such as trout, salmon, and steelhead) and their habitats. TU has more than 350,000 members and supporters nationwide, including many members in Oregon. In recent years, TU staff members have participated in smallmouth bass suppression efforts in the Coquille River watershed.

HB 2184 is intended to increase removal of smallmouth bass from the Coquille River by implementing a bounty program for each smallmouth bass removed from the watershed. Smallmouth bass prey upon juvenile salmon, and in recent years, the chinook salmon population in the Coquille River has collapsed, plummeting from thousands of adult fish returning each fall to only several hundred adult fish (likely due to a growing population of illegally-stocked invasive smallmouth bass that eat juvenile salmon).

TU shares the sponsors’ interest in controlling non-native fish species in the Coquille River. However, we disagree with HB 2184 as currently drafted for the reasons provided below. If the bill is rewritten to afford the ODFW Commission and Department greater flexibility in managing non-native game fish species – rather than implementing an expensive bounty program – we believe HB 2184 could achieve valuable conservation benefits for the Coquille River (and other watersheds facing increased pressure from non-native fish species).

1. **Competing Budget Request:** The ODFW agency request budget already includes a policy option package (“POP”) for non-native fish species suppression in the Coquille River. Specifically, POP 118 would establish 2 positions at ODFW (1.5 FTE) at a cost of \$340,498 in General Funds, for the purpose of researching, monitoring, *and removing* non-native bass from watersheds including the Coquille River. TU supports that strategic approach to addressing this problem.
2. **Cost:** HB 2184 will be expensive. Bounty programs need funding for bounty payments, but also agency staffing necessary to carry-out the program by receiving and disposing of

harvested fish, processing bounty payments, and verifying compliance with bounty program requirements. After accounting for necessary staff needs, and the funding necessary to make bounty payments (which could be in the hundreds of dollars per day for a single angler), the fiscal impacts of this bill likely exceed the \$340,498 requested for POP 118.

3. **Potential for Fraud:** The bounty program described in HB 2184 is ripe for fraud. By allocating a \$5 value per smallmouth bass, ODFW will be at risk of bad actors collecting smallmouth bass from sources outside the Coquille River (such as warm-water ponds without native fish) and requesting bounties for those fish. In that event, ODFW would pay public funds without any corresponding conservation benefit for imperiled salmon. In similar bounty programs (e.g., the Northern Pikeminnow Sport-Reward Program administered by the Bonneville Power Administration and ODFW), agency staff register participating anglers at the beginning and end of each day, but as mentioned above, that increases the demand for staff time.

TU Recommendation: TU encourages the legislature to work with ODFW staff on a new version of this bill that grants ODFW authority and flexibility to waive statutory protections afforded to game fish species in certain places for the purpose of conserving native species.

Under Oregon law, “game” and “food fish” species cannot be “wasted,” which generally means that anglers must clean and eat any smallmouth bass that they harvest.¹ The ODFW Commission recently adopted new regulations that remove bag limits for bass in Oregon rivers, and therefore, anglers may now retain unlimited numbers of bass per day in streams. However, the “waste” restrictions still apply to all those fish (i.e., each fish must be cleaned and eaten). The relating-to clause for HB 2184 is broad enough that it could be re-written to afford flexibility to the Department that allows the Commission authority to allow unlimited harvest (and subsequent responsible disposal, composting, etc.) of smallmouth bass in the Coquille. That will allow interested members of the public to assist in bass suppression efforts without the hefty price-tag of HB 2184.

Thank you for this opportunity to provide comments on this legislation, and please let me know if you have any questions.

Sincerely,

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Trout Unlimited
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¹ See ORS 506.011(5)(defining “food fish” as those species under ODFW Commission’s jurisdiction); ORS 509.112 (“It is unlawful for any person wantonly to waste or destroy any food fish.”).