



February 4, 2026

To: Senate Committee on Natural Resources and Wildfire
From: Oregon Association of Conservation Districts (OACD)

RE: SB 1584 Salmon Credit Program, Oppose

Chair Golden and Members of the Committee:

OACD represents the 45 Soil and Water Conservation Districts statewide, which are special districts with elected boards. The Districts protect and enhance soil and water quality and habitat through voluntary conservation in partnership with rural and urban landowners and managers. The Districts both provide technical assistance and are project implementers. They help landowners translate their conservation goals into practices and projects.

OACD opposes SB 1584 which would develop a salmon credit program in the Coos and Coquille watersheds. We believe that creation of salmon habitat is of vital importance, but this program is not a good vehicle. The following are our concerns:

The program is a habitat mitigation and trading program in which habitat is taken away in one location in exchange for new habitat in another location. In this situation there is always uncertainty about the quality of the exchanged habitats. Therefore, it is necessary to have a robust trading ratio (benefits of new habitat greatly outweighing the lost benefits of lost habitat), so that there is a high level of certainty that there will be substantial net benefits in the long run. This does not exist in this bill.

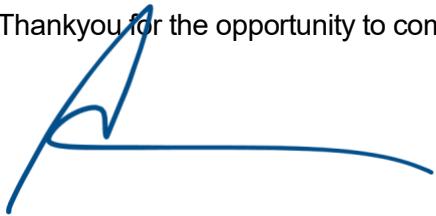
We know that lost habitat is gone forever. Therefore, we need a high degree of certainty that the new habitat will continue to provide the expected benefits in perpetuity. The bill lacks sufficient guidance on how long-term guarantees will be provided. These guarantees must include a permanent source of funds to maintain the new habitat such as an endowment fund held by a third party. The guarantees should also include third party oversight such as a conservation easement held by an accredited land conservancy. The bill does say that preservation of the work shall be through an instrument that "meets the standards prescribed by the department," but this language is much too vague. The bill does call for paying double the cost of the project to purchase salmon credits, but this does not mean that the excess money will actually be used to maintain the project in perpetuity.

We are also concerned about the burden placed on the Department of State Lands and the Department of Fish and Wildlife to develop the program and then administer the program. Already, these agencies are stressed with lack of funding to carry out their current obligations. If they have to take this program on, what are they going to drop?

Following are some additional problems with the bill:

- The bill allows trading habitat across watersheds. This is inappropriate as the mitigation would not benefit the population of salmon that is damaged.
- The bill says that the program does not affect the rights to fish on the property. It seems that if the purpose of the project is to grow fish, then taking fish on the property should not be allowed.

Thankyou for the opportunity to comment.

A handwritten signature in blue ink, appearing to read "Andrea Kreiner".

Andrea Kreiner, Executive Director
Oregon Association of Conservation Districts

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