

Exhibit B
Bob Sallinger



Date: October 9, 2019

To: ODFW Commission

From: Audubon Society of Portland, Center for Biological Diversity, Willamette Riverkeeper, Cascadia Wildlands, The Conservation Angler, Humane Society of the United State, Humane Voters Oregon, Oregon Wild, Defenders of Wildlife, Verde and ONDA

Re: Draft Administrative Rules for the Oregon Conservation and Recreation Fund Advisory Committee

Dear Chair Finley and Members of the ODFW Commission,

We appreciate the opportunity to comment on the draft administrative rules for the Oregon Conservation & Recreation Fund Advisory Committee. The Oregon Conservation and Recreation fund, created by HB 2829 during the 2019 legislative session, represents an important opportunity to increase support for implementation of the Oregon Conservation Strategy and to diversify the base of people engaged in ODFW activities. It is an important step in moving ODFW towards a more holistic and inclusive approach to managing the state's wildlife.

We are generally supportive of the draft rules and recognize the urgency of getting the advisory committee in place, given the two year timeframe in which funds allocated by HB 2829 must be spent. We appreciate the changes that have been made in the current draft to better prioritize ensuring diverse representation on the advisory committee and engagement of diverse audiences in the expenditure of the funds. However, there are four sections where we believe the draft rules could still be improved:

635-098-0040 (1)(b): This section currently reads "Six members of the advisory committee shall live in or possess demonstrable expertise related to each of the ecoregions described below." We would respectfully request that this line be changed to read. "Six members of the advisory committee shall ~~live in or~~ possess demonstrable scientific expertise related to each of the ecoregions described below." The focus of these positions should be on ensuring that committee members have strong scientific expertise in the ecoregions, rather than on where they pick-up their mail. We urge you to remove the "live in" language altogether and clarify that the intent is that committee members have "scientific" expertise.

635-098-0040 (1)(c): We would respectfully urge the commission to add “expertise in urban conservation” to the list of interest areas delineated in this section. The majority of the population in Oregon is now urban and urban conservation presents an important conservation priority that is not captured in the ecoregional approach outlined in section 635-098-0040 (1)(b). Expertise in urban conservation would therefore be an important interest area to try to capture in the at large positions.

635-098-0040 (1)(d) and (e): These two sections focus on engaging diverse audiences and ensuring diverse representation on the advisory committee. Both of these sections should be strengthened by specifically referencing “communities of color, tribes and low income communities.” We would also recommend changing “should” to “shall” in each of these sections. We believe that it is important to specifically call out historically marginalized communities which have been underrepresented in ODFW activities.

635-098-0020 (2) This section currently reads, “Improving engagement of the public in hunting and fishing opportunities and in other outdoor recreation opportunities related to and in support of healthy fish, wildlife and habitats;” We would respectfully request that this section be changed to read, “Improving engagement in outdoor recreation opportunities including wildlife watching, hunting, fishing and other activities that support healthy fish, wildlife and habitats.” The currently proposed language in the draft rules unfortunately perpetuates a longstanding trend of prioritizing hunting and fishing while treating other wildlife related recreational activities as afterthoughts. Given HB 2829’s emphasis on engaging new audiences, we believe the language we are proposing would reflect a more inclusive and holistic approach to recreation and recognize that wildlife watching is actually the most popular wildlife related activity in the state.

Thank you for your consideration of these comments.

Respectfully,

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