

Memorandum

To: Mary Wahl, Chair, Oregon Fish and Wildlife Commission
Cc: Commissioners, Oregon Fish and Wildlife Commission
Curt Melcher, Director, Oregon Department of Fish and Wildlife
Fr: David Moskowitz, Executive Director
Dt: November 13, 2020
Re: Taking the Long View: Opportunities Created by Fire Damage at Fish Hatcheries

The Conservation Angler and other organizations are concerned about ODFW's short-term actions being taken with little apparent regard for any long-term analysis.

While it is good practice to quantify the losses suffered during these wildfires and to meet required deadlines to qualify for insurance or relief, there should be a community conversation to ensure that funds received or recovered from state, federal or private sources are judiciously conserved, carefully considered and wisely applied so they contribute to the broadest and most effective recovery – serving as the seeds of change – just as the first rains often begin rebuilding scorched soils and germinating seeds that do not without fire.

Oregon's response cannot be simply to just rebuild all the facilities that were lost and to continue business as usual. The September 2020 fires must be viewed as an opportunity for ODFW to imagine the future and determine what the fish propagation program should look like in the next decade and in the decades after that.

This is essential given the pace of climate-change related wildfire frequency and intensity as well as climate impacts to patterns of precipitation. Oregon's natural ecosystems and native fish and wildlife are better adapted to change than our hatcheries and human infrastructure – thus agency efforts to address climate change must support our fundamental natural infrastructure – wild fish populations, clean cool waters, and allowing habitat processes (including fire) to create the necessary elements that foster productivity, resilience and abundance.

Sadly, even before the fall rains extinguished these fires, private, state, federal entities began cutting fire-damaged trees along the Santiam, McKenzie and North Umpqua Rivers, relying on hazard tree removal protocols, likely without necessary consultations with federal authorities (NOAA and USFWS) over the habitat modification impacts of the salvage timber harvesting on spotted owl and coho and spring chinook salmon habitat along the Santiam, McKenzie and North Umpqua Rivers.

These actions will have substantial and long-term impacts of the recovery of riparian areas along the North Umpqua, including Rock Creek itself. Stream restoration work in and along Rock Creek was also a complete loss – a major setback to improving the water quantity and quality for Rock Creek and the North Umpqua.

Climate Change is evident in patterns of precipitation that will affect streamflow and water quality. Many of Oregon's hatcheries have questionable water supplies. The existing system is outdated and in need of major repairs. Emerging scientific understanding shows that the existing hatchery system needs to change. Water conflicts will continue to arise between power generation, out-of-stream water demands and instream flows.

ODFW should take this moment to conduct a critical review of its hatchery system so it can create a blueprint for the next 30 to 50 years – one that considers new technology, is well planned in terms of risk management (genetic diversity, fires and water) and considers the poor track record of the aging and failing current system.

A New Vision

The Conservation Angler asks that the Commission convene in a special session to consider a more holistic response to the 2020 wildfires in the Santiam, McKenzie, and North Umpqua Rivers. The Commission could join with the local communities and stakeholders on a broader conversation about rebuilding options and making changes to management priorities to support native fish assemblages and widespread community benefits.

In the interim, the Commission should direct ODFW to pause on-the ground work to repair, replace and restore the hatcheries that were damaged in the fires until a comprehensive assessment is complete that examines the pros and cons of restoring the facilities that were damaged in the fires (Santiam complex, Leaburg, Rock Creek, Klamath) before any further action is taken. There should not be any irretrievable commitments of resources prior to a comprehensive review of desired future conditions.

ODFW should continue pursuing disaster funding through state and federal mechanisms for losses of facilities and fish caused by the wildfires, but should do everything possible to maintain a broad perspective on the future use of such funds and their use in restoring fish and wildlife habitat and natural production.

When considering what the future holds in the North Umpqua, concerned regional and local organizations urge consideration by the Commission for a revised subbasin plan with a comprehensive and focused natural production priority rather than rebuilding the hatchery. The North Umpqua is uniquely suited to such a re-set.

Recent and On-going Agency Action that Should be Reviewed and Reported On

ODFW was proactive in protecting staff, infrastructure, and fish at ODFW hatchery facilities as the fires loomed. Now that staff and their families, the facilities and many fish are safe, it is time to assess the actions taken regarding compliance with existing basin and species and hatchery plans. The Commission should receive a comprehensive report on specific ODFW actions regarding the transfers, releases and any current plans for additional transfers and releases by facility and species. Any ODFW's post-fire report could include the following assessments:

1. Identify instances where the fire-related actions at ODFW hatcheries complied with the NFCP and Basin Plan requirements prohibiting basin stock transfers. This could include a detailed accounting of the species, number of fish, life-history stage of the released fish, facility of origin and the receiving waters.
2. Identify instances where the fire-related actions at ODFW hatcheries may not have complied with the NFCP and Basin Plan requirements prohibiting basin stock transfers. This could include a detailed accounting of the species, number of fish, life-history stage of the released fish, facility of origin and the receiving waters.
3. ODFW should detail the instances where hatchery-origin salmonids were stocked into waters they were not originally meant to be released, including species, stock, life-history stage, originally planned receiving waters and ultimate receiving waters.
4. ODFW could detail all instances where hatchery fish management actions were taken that were not authorized in approved or pending HGMPs. Details should include species, stock, life history stage, ESA status of fish in the receiving waters and other relevant data.
5. ODFW should detail where it has been in consultation with federal, state and private entities regarding fire-remediation activities that has resulted in adverse habitat modification for ESA-listed species (Coastal Coho, Willamette Spring Chinook, Northern Spotted Owls and any other listed species).

The bottom line is that like with wildfires, all is not lost along several iconic Oregon rivers. While there are many losses of both natural and human treasures, it is critically important that the Commission and ODFW take a clear-eyed look at the opportunities that also present themselves in the aftermath of what is hard not to call a disaster on so many levels. We must see the forest not just the trees. The wild fish will continue to obey their duty to return and we must honor and allow that – keeping as many wild fish as possible in their natal rivers to spawn will be the best thing we can do.

