

# **Exhibit B**

**Supplemental  
Public Correspondence Received as of  
June 17, 2022**

**BORISCH Roxann B \* ODFW**

---

**From:** David Moskowitz <david@theconservationangler.org>  
**Sent:** Friday, June 17, 2022 8:46 AM  
**To:** COMMISSION ODFW \* ODFW  
**Cc:** TATE Michelle L \* ODFW  
**Subject:** TCA Written Comments on the ODFW Budget  
**Attachments:** TCA Testimony to the OR Fish and Wildlife Commission on the 2023-2025 ODFW Budget.pdf

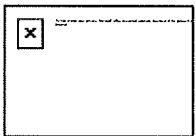
**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Commissioners,  
These written comments are follow ups to our oral testimony in May and I will touch on some of these issues during my testimony today.

Sincerely,

David Moskowitz

--  
David A. Moskowitz  
Executive Director  
The Conservation Angler  
[david@theconservationangler.org](mailto:david@theconservationangler.org)  
[www.theconservationangler.org](http://www.theconservationangler.org)  
971-235-8953



*Tout ce qui est impossible reste à accomplir. ~ Jules Verne*  
All that is impossible remains to be accomplished.



June 16, 2022

### **TCA Comments to the OR Fish and Wildlife Commission on the 2023-2025 ODFW Budget**

It was difficult to say much about the ODFW Budget, its program priorities or the Policy Option Packages without the full narratives and budgets. The ODFW Program Priority List still appears to include every single program ever created at ODFW – few programs have ever been evaluated. It is a curious exercise to compare the 2023-2025 Program Priority list with 49 Priorities items compared to the 2021-2023 Priorities with 57 Program Priorities. It would be helpful if these changes were explained. A nice feature missing from the most recent Program Priority List are the totals from 21-23 compared with no totals in the 2023-25 Priority list.

TCA would like to understand the basis for the Program Prioritization list. Is the list based on the number of FTE? Is it based on the size of that program's budget? Is there a statutory basis for these rankings?

Since the ODFW ARB for 2023-25 totals \$502 million, we find the Capital Improvements and Major Construction totaling just over \$15 million which is less than three percent of your budget. This is an insufficient investment in the agency's hard infrastructure.

This highlights the problem with managing based on the current service level budgeting process – everything is always a priority even though there has not been a rigorous evaluation process of the programs or their priorities. Is there even a set of criteria against which each program is measured so that establishing a priority rank has any comparative meaning? Rather than continuing to pile new programs on new programs, isn't it time to do a serious review of existing programs to see which ones can be reduced or eliminated?

We do not know if ODFW's deferred maintenance problem at the hatcheries has been resolved. Nor does this seem tied to the Climate Vulnerability Assessment of the Hatchery system due to the Legislature in 2023. ODFW proposes to spend the next phase of bond revenues (~\$5 million) on district and regional offices – TCA supports this, but the overall allocation of funds is insufficient to catch up or ever meet the rate the of infrastructure decay.

For example, Oregon's Hatchery System is an important public investment in facilities and people and it is outdated, falling apart, at risk to climate change impacts – and TCA supports ODFW's climate vulnerability assessment of the hatchery system, Oregon's hatchery system needs a comprehensive evaluation that goes beyond climate change and crumbling concrete.

A specific example is at Leaburg and McKenzie Hatcheries where ODFW was recently granted a long-overdue revised water quality permit from DEQ – one that does not cure the long-standing water quality violations caused by these two facilities in the McKenzie River. In fact, the permits allow ongoing water quality violations for temperature pollution by granting ODFW an exemption to enforcement of the water quality violations until after 2030, *urging* ODFW to show progress in addressing this hatchery pollution program in one of Oregon's most pristine rivers – one that provides drinking water to Oregon's third-largest population center. ODFW's budget does not provide funds to address this problem – one that is common at almost every hatchery in the state.

TCA supports the use of General Fund dollars to support the following budget packages:

We support the continued buildout of the Habitat Division including the Statewide Stream Temperature Monitoring via one new position funded with General Fund. The position would serve as data steward/analyst in a program to monitor stream temperatures statewide.

We support Klamath Salmon Restoration Monitoring via new permanent positions funded with General Fund for research, monitoring, and evaluation of the reintroduction of anadromous fishes in the Upper Klamath Basin but only if a sequential set of actions tied to Klamath River Dam removal and connectivity to the Oregon portion of the Upper Klamath Basin continue to proceed apace and focus on the volitional and natural recolonization of anadromous fish species currently blocked from entering Oregon waters.

TCA does not support General Fund dollars for these packages:

Enhance Columbia River Fisheries Analysis ◦ This package requests one new permanent position funded with General Fund. ◦ This position will analyze and interpret data to help increase responsiveness to rapidly changing in-season fishery management issues.

Non-Native Fish Management ◦ This package requests two new seasonal positions funded with General Fund. ◦ These positions would support small mouth bass control efforts in the Coquille River.

These packages should be funded with license dollars, which are shrinking due to fewer anglers and for which the overall decline is more evident on a per capita basis, since Oregon's population has nearly doubled from 1990 to 2020. In 1990, 20% of Oregonians fished and 12% hunted. Today, only 12% fish and 7% hunt. The opportunity to hunt and fish is a privilege and is worth more than is being charged.

#### Managing for Indigenous Species – The Commission's overriding statutory duty

TCA is concerned that ODFW does not have the designated person in charge of the Native Fish Conservation program and responsible for annual reporting identified for the agency to meet its overriding statutory duty. TCA would like to know when the Commission was last updated on the status of native fish in Oregon. We request answers to the following specific questions:

1. When was the last Native Fish Status report updated?
2. Is the Commission updated on the Native Fish Status in Oregon annually?
3. When was the Commission last updated on the Native Fish Status Report?
4. When was the public last updated on the biological status of native fish in Oregon?
5. Does the Native Fish Status Report inform ODFW's decisions on management?

#### General Comments

TCA supports agency budget requests related to the Habitat Division, specifically in drought planning and climate change adaptations, land and water management and data and information gaps. TCA also supports ODFW's water program including Integrated Water Resources Solutions and Statewide Stream Temperature Monitoring. An area of concern is securing continuation of the limited duration instream water rights protest staff which should be added as a permanent position. The reason for this callout is that there are nearly 200 instream water rights that have been protested. ODFW must adequately staff this position to address these essential critical streamflow protection tools.

#### Policy Option Package Concerns

POP 134 Jubilee Meadows Dam Repair – Umatilla Nat Forest. The Dam was built in 1967 and is 50' high and 350' long and blocks Mottet Creek which is noted as having Bull trout Spawning and Juvenile Rearing habitat and flows into Little Lookingglass Creek. Apparently ODFW owns this dam and plans to spend \$1.5 million.

**Contact:** David Moskowitz, The Conservation Angler \* 3241 NE 73<sup>rd</sup> Ave \* Portland, OR 97213



# OREGON HUNTERS ASSOCIATION

## Protecting Oregon's Wildlife, Habitat and Hunting Heritage

P.O. Box 1706, Medford, OR 97501 • (541) 772-7313  
[oha@oregonhunters.org](mailto:oha@oregonhunters.org) • [oregonhunters.org](http://oregonhunters.org)

June 16, 2022

Chair Wahl, Director Melcher, members of the commission,

The Oregon Hunters Association supports of the proposed 2023-25 budget and the robust list of Policy Option Packages (POP) put forth.

In particular, OHA is appreciative of the creation and inclusion of POP #115 regarding additional staffing to assist in increased sample collection and testing related to Chronic Wasting Disease (CWD). With CWD encroaching on Oregon's border, the need for increased sampling and awareness is paramount. At the May 2022 Commission meeting, OHA provided testimony requesting a funding POP that addressed the needs associated with CWD; we appreciate the responsiveness of the Commission and ODFW staff in bringing POP #115 forward for approval.

Additionally, we encourage the continued prioritization of the Mule Deer Coordinator (POP #122) and Mule Deer Research component contained in the Wildlife Regional Programs Alignment (POP #136). As we highlighted in our previous testimony, more robust research and investment into the study of Mule Deer populations is greatly needed at this time.

OHA supports the Minam River Wildlife Area Acquisition (POP #121) and urges the Commission to prioritize the final acquisition phase of this momentous conservation opportunity.

Each of the POPs supported by OHA represent important parts of department's mission to protect and enhance Oregon's fish and wildlife and their habitats for use and enjoyment by present and future generations. As the Commission moves forward with approval of the 2023-25 budget, each POP should be weighed against the mission and scope of the department so as not to lose the focus and effectiveness of department's efforts.

OHA is encouraged by the numerous requests for General Fund dollars and believe the department should go boldly forward with the message that all Oregonians can contribute to wildlife management and conservation, in addition to the hunters, anglers, and trappers who have historically provided a majority of the department's income through licenses, tags, and federal excise tax funding.

Thank you,  
Amy Patrick  
Policy Director

**BORISCH Roxann B \* ODFW**

---

**From:** Satya Vayu <Satya.Vayu.523340535@p2a.co>  
**Sent:** Thursday, June 2, 2022 3:52 PM  
**To:** COMMISSION ODFW \* ODFW  
**Subject:** I strongly support ODFW's wildlife coexistence funding package

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Oregon Dept. of Fish and Wildlife Commission,

Thank you for bringing forward the Wildlife Coexistence Funding Package. I strongly support its inclusion in the ODFW budget.

This funding package will help ODFW shift toward wildlife management that's focused on human-wildlife coexistence and wildlife rehabilitation. The funding package will also help engage new audiences in conservation, promote wildlife stewardship, and either prevent human-wildlife conflicts or provide humane and effective solutions for wildlife when conflicts occur.

I support including this funding in ODFW's 2023/24 budget.

Thank you for your time.

Signed,  
Satya Vayu  
608 SE 45th Ave  
Portland, OR 97215