

# **Exhibit F**

**Supplemental Public Correspondence  
Received as of August 13, 2025**

## SPANSEL Linda D \* ODFW

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**From:** Skyler Longworth <skylerdlongworth1@gmail.com>  
**Sent:** Monday, August 11, 2025 5:21 PM  
**To:** ODFW Commission \* ODFW  
**Subject:** Fall Coho Umpqua

 You don't often get email from skylerdlongworth1@gmail.com. [Learn why this is important](#)

To whom it may concern,

I am a sport angler and tackle manufacturer with concerns about the Umpqua River coho salmon proposal. I would like to express my gratitude for the allowance of a chinook season this fall and can appreciate the extension of that love branch, however I must ask for another. Alltho it is better to have a limited season than none at all plenty of Winchester bay business are already on life support this year due to lack of foot traffic, empty parking lots means no lunches sold, no ice sold, no gas sold, no tackle sold, no launch passes sold and less camping, just a few of the things that help keep the pulse going on the coast. Coho are abundant based on common sense and what sportsmen are seeing daily. I'm hopeful that the department will find a compromise to the proposal and extend yet another olive branch to try and continue to heal a scared relationship between sportsman and the "folks in charge". Everyone can benefit from working together on this we want to see the fishery succeed and we also want to see our laundry list of state fees go to something that gets us on the water not off of it. This is not just our hobby It is our culture!!

Thank you for your time  
Skyler longworth

**From:** Jamie Hawkins <jamie110285@yahoo.com>  
**Sent:** Monday, August 11, 2025 5:32 PM  
**To:** ODFW Commission \* ODFW  
**Subject:** Coho fishing on Umpqua River 2025

You don't often get email from jamie110285@yahoo.com. [Learn why this is important](#)

To whom it may concern,

I heard about the staff's proposal of closure to the wild coho retention on the Umpqua. I'm writing you to encourage the opening of Coho salmon retention for this year 2025 on the Umpqua River for several reasons. This will affect local businesses, my family and friends. I do have some suggestions that may help prevent over harvesting and better estimates of fish populations.

If you continue to keep it closed, local businesses will continue to loose income that comes from people traveling and fishing the river. Most coastal communities and businesses survive on the seasonal business spring-fall. Some examples of impacted businesses are fishing bait/tackle shops, restaurants, grocery stores, hotels, RV camping, gas stations, etc. By keeping the river closed it also forces fishermen to put more pressure on other rivers. Potentially making problems for over harvesting there from extra guides and people going to the only open rivers or nearby rivers to keep fish.

I remember when we could go drop a few crap pots in Winchester Bay and go troll for coho while they soaked. It was so much fun! Unfortunately our daughters have not gotten to experience the fun of catching and keeping Coho salmon on the Umpqua River. They are avid fisher girls at the age of 4 & 7. They understand when we have to release them but it's always exciting when they do get to keep a fish. The smiles, the stories and the memories made are priceless. We want our next generation to get to enjoy the great outdoors and fishing. As well as being able to provide nutritious food for our family.

I would recommend for ODFW to make some regulations & rules for fishing guides. They tend to harvest high amounts of fish every season. Since they have lots of clients and they go out fishing every single day, many times limiting out all the clients in their boat daily. Many times they have at least 4 to 6 people in their boat when salmon fishing. Having regulations where only so many fish per river can be kept per year per guide boat, and/or only certain days they can fish, and/or permits for certain rivers, could help prevent over harvesting of the fish. So the regular sport fisherman and their family's can go out and enjoy fishing occasionally and not be in fear of over harvesting and rivers being shut down from all the guides draining the natural resources.

I also have to say that ODFW guessing on annual fish returns is not accurate. Only going by fish reported caught is not a good measurement or even estimate of fish the population. There can be lots of fish present but no or only few biting fish. Some people aren't very good at fishing and some people are. The reported fish caught is only a very small percentage of fish on a river system. As someone who has had family work for ODFW (my father and both grandfathers) and I grew up at a fish hatchery; I fully support step programs and releasing fish into the rivers to help returns/allow fish numbers be high enough for sport fishermen.

I would recommend ODFW scouts/employees go up rivers in boats and see the spawning salmon (springers and fall chinooks, and coho). This could help project return numbers in 3-5 years when they return. As well as utilizing our technology now with live feed fishing cameras/imaging. It's always great when we can count fish, going thru a fish ladder at dams as well.

It is very wrong to deny us of a fishery that has the numbers to allow us to fish it. There has been a huge abundance of Coho Salmon on the Umpqua River the last several years. We have seen them jumping in the river, saw them on the fish finder screen and have even caught and released some.

Please reconsider opening the Umpqua River for retention of Coho Salmon this fall. For the businesses, family's, and for the hobby fisherman.

Thank you for your time,  
Jamie Hawkins  
Sent from my iPhone



ODFW Commission  
4034 Fairview Industrial Drive SE  
Salem, Oregon, 97302

August 11, 2025

**RE: ODFW Proposed Fishing Regulation for 2025 Oregon Coast Natural Coho**

Chair Wahl, Vice-Chair Hatfield-Hyde, and Members of the Commission:

Wild Salmon Center (WSC) appreciates the opportunity to comment regarding the proposed Oregon Coast Natural (OCN) coho salmon regulations for the upcoming 2025 season.<sup>1</sup> **WSC supports a coho fishery, but encourages ODFW to manage fishing regulations for OCN coho by applying the precautionary principle in order to support efforts to delist and recover this threatened species. Harvest on OCN coho should stay below 15% until full ESA recovery is achieved.**

WSC is a nonprofit organization based in Oregon that focuses on protecting and conserving salmon strongholds on the Oregon Coast, where wild salmon populations are strong and diverse, and where habitats are highly functioning and intact. We use science to drive policy, lead planning processes, and support implementation of durable conservation protections.

Over the past decade, OCN coho populations have increased in abundance, thanks to bold actions by fisheries and land managers.<sup>2</sup> These efforts have included reducing commercial and recreational harvests, cutting or eliminating hatchery coho releases, and protecting and restoring essential coho habitat.

**ODFW Proposed OCN Coho Regulations**

ODFW proposes a 30% exploitation rate for OCN coho during the 2025 season. WSC recognizes that this rate remains unchanged from the 2024 exploitation rate. Actual exploitation rates for OCN coho stocks varied regionally, ranging from 28.5% in the Coos to 17.4% in the Floras, with an overall mean exploitation rate of 24.05% for populations indicated in the OCN coho agenda summary. The Pacific Fisheries Management Council is forecasting a run size of 289,000 OCN coho this season, slightly higher than last year's forecast.<sup>3</sup>

Although the current proposal is similar to the 2024 OCN coho regulations, WSC encourages ODFW staff and the Commission to use caution and adopt a 15% exploitation rate to increase spawner abundance for OCN coho.

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<sup>1</sup> ODFW Draft Rules OCN coho

[https://myodfw.com/sites/default/files/2025-07/Exhibit%20F\\_Attachment%204\\_Coastal%20Rivers%20and%20Lakes%20Wild%20Coho%20Fisheries\\_2024%20report%20and%202025%20proposal\\_final\\_6.24.25%20.pdf](https://myodfw.com/sites/default/files/2025-07/Exhibit%20F_Attachment%204_Coastal%20Rivers%20and%20Lakes%20Wild%20Coho%20Fisheries_2024%20report%20and%202025%20proposal_final_6.24.25%20.pdf)

<sup>2</sup> ODFW OCN coho summary Figure 1

[https://myodfw.com/sites/default/files/2025-07/Exhibit%20F\\_Attachment%201\\_Agenda%20Item%20Summary.pdf](https://myodfw.com/sites/default/files/2025-07/Exhibit%20F_Attachment%201_Agenda%20Item%20Summary.pdf)

<sup>3</sup> ODFW OCN coho summary Table 2

[https://myodfw.com/sites/default/files/2025-07/Exhibit%20F\\_Attachment%201\\_Agenda%20Item%20Summary.pdf](https://myodfw.com/sites/default/files/2025-07/Exhibit%20F_Attachment%201_Agenda%20Item%20Summary.pdf)

## **Actions and strategies that have led to an increase in the abundance of OCN coho**

Since listing Oregon Coast coho populations in 1998, numerous actions and strategies have been implemented in response. These include significant reductions in OCN coho harvest, decreased hatchery coho releases, and substantial investments in habitat restoration. WSC recommends that ODFW and NMFS continue implementing the strategies and actions outlined in the *Final ESA Recovery Plan for Oregon Coast Coho Salmon* (December 2016)<sup>4</sup> and the *2022 5-Year Summary and Evaluation of Oregon Coast Coho Salmon*.<sup>5</sup>

Additionally, WSC is fully committed to working with state and local partners to further develop, adopt, and implement Coho Strategic Action Plans (SAPs) across Oregon. These action plans and changes in fisheries management have contributed to the recent increases in OCN coho.

## **Providing harvest opportunities while moving towards recovery**

A 30% exploitation rate, on an ESA listed species, is too high. Traditional fisheries management strategies allowed high harvest rates during years of higher abundance, based on a theory that adult salmon would fully seed the available habitat. New and precautionary management strategies show greater species benefits to allowing a larger escapement in years of relatively high abundance: 1) in years of higher escapement, salmon spawning occurs in a larger portion of the stream network, increasing the spatial distribution of habitats used by fish; 2) higher escapements are essential for producing juvenile fish that express a wider diverse life histories (e.g., a greater number of fry migrants can occupy suitable estuarine habitat and other complementary habitats); and 3) there are ecological benefits of having more fish reach the spawning grounds for consumers and ecosystem nutrient cycles.

Based on new management strategies, WSC is asking ODFW to apply the precautionary principle to management by limiting harvest to a 15% exploitation rate on the Oregon Coast. Beaver Creek and Floras Creek are examples of small populations that could be disproportionately negatively affected by a 30% harvest rate.

## **Umpqua Basin OCN coho populations**

WSC appreciates that ODFW has restricted harvest on the Umpqua populations. The OCN populations in the South Umpqua and Middle Umpqua saw a decline from 2022, with no coho being observed during ODFW spawning surveys in the South Umpqua Basin. As noted above, WSC is working with local Umpqua Basin stakeholders to develop a Strategic Action Plan for the South Umpqua coho population. We encourage ODFW to continue developing this action plan and to help support its implementation.

WSC recognizes the challenges faced by ODFW staff and the Commission in managing ESA-listed OCN coho. **WSC urges the ODFW Staff and Commission to manage these populations using the precautionary principle, decreasing coastwide exploitation rates to 15% to provide harvest while increasing spawner escapement, juvenile productivity, and life history diversity.** WSC looks forward to continuing to assist ODFW's efforts to restore coho populations in Oregon.

Please let me know if you have any questions.

Sincerely,

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<sup>4</sup> United States, National Marine Fisheries Service, (2016). Final ESA recovery plan for Oregon Coast coho salmon (*Oncorhynchus kisutch*).

<sup>5</sup> "2022 5-Year Review: Summary" (2022). <https://doi.org/10.25923/95k5-p494>

A handwritten signature in black ink, appearing to read 'K. Blaine', with a stylized flourish at the end.

Kirk Blaine  
Sr. Wild Fish Manager - Oregon  
Wild Salmon Center  
[kblaine@wildsalmoncenter.org](mailto:kblaine@wildsalmoncenter.org)

**SPANSEL Linda D \* ODFW**

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**From:** Matthew Russell <mterussell@gmail.com>  
**Sent:** Tuesday, August 12, 2025 5:58 PM  
**To:** ODFW Commission \* ODFW  
**Subject:** Re: Automatic reply: Coho retention and other things.

**Categories:** Fish

To Whom It May Concern,

I fished the Umpqua River this last weekend, 8/9/25. We saw and caught Chinook on the Saturday it was open. One thing I noticed was the amount of fish I am assuming where Chinook on the fish finder and what I saw people catch. Looked better than I had seen any day the last couple of years, of course, that's only one day. I want to touch on the fact that in the ocean, you folks raised the commercial troll fleet weekly quota two times for Chinook, tapping out at 100 fish a week. So obviously someone decided there was a fair amount of Chinook out there to be caught. There was no extension passed on after the July 16th closure of Chinook retention, which was disappointing considering the number of Chinook being released outside the mouth of the Umpqua by sport anglers fishing for coho. But it was nice to get 500 to fish for in the river. My personal thought this late in the year, those fish outside might be Umpqua fish and the Chinook run might be better than expected.

With all that being said, the Umpqua and Rogue rivers are not all that different, yet the Rogue keeps getting excellent fall runs and the Umpqua continues to decline. You folks need to fix what is broken. Isn't this what you get paid to do? Maybe giving the Rock Creek hatchery to an Indian Tribe to rebuild and run as see fit might be a good start. Just a thought. Starting to take aim at the small mouth population might be another.

The wild coho retention season in the Umpqua has been a great extension onto the salmon season. It keeps fisherman folks coming back to the coast areas to fish, spending money which in turn helps the economy. I have heard many reasons why you folks don't, or are considering not having a coho season on the Umpqua. Last year that river was loaded with coho; the last several years the Coho fishing has been good. We should get a coho season as those fish are already showing up in the river. It's going to be a good run this year. If anything, we should be adding more hatchery coho and Chinook to this river.

I have been fishing for my whole life, and am now watching you eliminate the species and the amount of fish we can fish for and wanting more money for it. Maybe it's time to give us more for our dollar and not less.

Thank you

Sincerely,

Matt Russell, life long Oregon resident and outdoor enthusiast.

On Tue, Aug 12, 2025, 12:17 PM ODFW Commission \* ODFW <[ODFW.COMMISSION@odfw.oregon.gov](mailto:ODFW.COMMISSION@odfw.oregon.gov)> wrote:

Thank you for your interest in Oregon's Fish and Wildlife. Your email has been received. Thank you.



**SPANSEL Linda D \* ODFW**

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**From:** Craig Augustynovich <finsandfeathersguides@gmail.com>  
**Sent:** Wednesday, August 13, 2025 7:08 AM  
**To:** STAHL Tom \* ODFW; ODFW Commission \* ODFW; COLBERT Debbie L \* ODFW  
**Subject:** Umpqua River Closures  
**Attachments:** 2025 Umpqua Coho Regulations.pdf; 2025 Oregon Coastal Fall Chinook Salmon.docx

Dear Tom, Debbie and Board,

I felt it necessary to send one more email before Friday's meeting in the hope that ODFW and the commission can make some good decisions and changes to the rules and plans on the Umpqua River.

I don't want to pretend that the changes you are making to the umpqua is going to ruin my season, because it is not. I have been a guide in Alaska since 1991 and a guide/charter boat in Oregon since 1994. I have an extremely loyal clientele and will come fishing and follow me wherever I have to go to have a good time. My fishing schedule has changed so much over all these years it really is amazing. In the early nineties, I watched willamette spring fishing go to thursday and saturdays only, causing me to start guided turkey hunts. I built a great Sturgeon fishing business to watch it get taken away overnight, so I bought a drift boat and started guiding steelhead again. What I am getting at is that I have to adjust all the time in the guiding business and I will again this time. I will fish the same number of days as I planned, I will just have to do it somewhere else.

What you guys are overlooking is the devastation to Winchester Bay and the Reedsport community you have caused. The ODFW name in these communities is mud and ODFW is public enemy number 1. Even the non fishing locals at the gas stations, hotels, restaurants etc are expressing their open hatred for ODFW. Many businesses are down as much as 80% and will be lucky to make it through the slow season or the 2025/2026 season. The good news is it's not too late to make some changes and save face with the communities. This Friday can be a big day. I could understand this if the fish runs were really as bad as ODFW say they are. This is truly just poor research and lack of effort to get good data to make decisions on. Someone from the department should be in winchester right now to see the numbers of both chinook and Coho.

In the meeting one of the topics we discussed after the meeting was getting good feedback from industry professionals to aid in your management and decisions. I try to be a very active advocate for strong fish programs and runs and have always been willing to put my time and money where my mouth is. I want to see us get back to good management and see strong healthy fishing and wildlife runs and populations. Right now, there are a lot of fish in the umpqua bay and lower river, maybe even more than normal. One of my guide friends was the only boat along the jetty yesterday, I mean the only boat period.. The only truck and trailer in the parking lot, tragic to say the least. But he managed to in rough windy conditions land 18 silvers on the incoming tide and 6 where Hatchery Coho. Long and short of it, there are lots of fish around in the Umpqua both Chinook and Coho.

Your decisions to both limit the Chinook season and ultimately not give us a inriver coho season is wrong and is based on bad research and or lack of staff to conduct correct studies. I have again attached my

letters already submitted to the commission by my attorney for both the June meeting and the August meeting coming up.

I have some Suggestions:

1. ODFW based on the sheer number of Chinook in the river and bay right now, consider keeping the fishing open on Tuesdays, Thursday and Saturdays until October 15, 2025. Even if ODFW numbers were correct for 2024 and estimated 2025 numbers the sliding scale was only short 130 fish. This number certainly did not warrant the action ODFW took. In these numbers, ODFW estimated that the Chinook return in 2024 was only 1,318 fish with a sport fish catch of 1,820 fish. As much as I would like to take credit for this, it is not possible. You want feedback, well here is some. For every 1 sport caught fish caught at least 10 go by. Watch Bob Toman's underwater video on catching chinook salmon with spinner, plugs and eggs and you are amazed how many fish do not even look or consider our offerings. Sport Anglers are extremely inefficient in catching fish because we have to catch them on their terms. I promise if the last chinook is gone, it won't be because we were able to catch it on a hook.

\*\*\*\*At the very least an ODFW Biologist should be in the Winchester Reedsport area monitoring the number of salmon around in the bay\*\*\*\*

It is not unusual for fish and wildlife agencies in both Alaska and Oregon to adjust season, extend season and make large bag limits if the fish return is better than expected. This should really be considered right now in the Umpqua River.

2. ODFW should consider an in river coho quota in the Umpqua river similar to the 2024 season. This quota should be the same as 2024, 1 a day 3 for the season from September 15 to October 15. Based on the lack of effort to get a good survey done in 2022 like my attached letter clearly points out.

In closing, if ODFW is going to make decisions to destroy local economies and people's livelihoods you better make sure you have done thorough and good research. I can give example after example where ODFW is not putting in the effort to get good data. Just in the coho spawning surveys in 2022 were only 16 sites only covering 10 miles of river were even looked at, where in the past 27 sites over 19 miles of river were surveyed. Another perfect example is the North Umpqua winter steelhead count. There is a second entity run by past ODFW biologists doing very accurate and thorough research and they are getting close to 1500 more steelhead a year through the window then ODFW is getting their counting methods and refuse to listen.

In short, I truly want to be part of the solution, and only continue to draft emails and letters to ODFW personnel, Directors and commissioners to hopefully have a positive change in community and management. We have the ability to manage our wildlife and fisheries if we all just decide to get along. Here is a perfect chance for ODFW to work with a local community and hopefully make a move in the right direction.

I am sorry to be so long winded, but I am extremely emotional and passionate about the outdoors and maintaining an environment that my Kids Kids Kids can enjoy

Please feel free to reach me on this email or by phone at 541-974-6567.

Best Regards

Craig Augustynovich, Owner  
Fins and Feathers Guide Service, LLC.



# CAROLLO LAW GROUP

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Managing Attorney

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## Via Email

August 4, 2025

Oregon Fish and Wildlife Commission  
4034 Fairview Industrial Drive SE  
Salem, OR 97302  
[ODFW.Commission@odfw.oregon.gov](mailto:ODFW.Commission@odfw.oregon.gov)

### **Re: Umpqua River Coastal Coho Fishing Regulations for 2025**

Dear Commissioners:

Please accept the following comments on behalf of Fins and Feathers Guide Service, LLC (“FFGS”) on ODFW’s proposed regulations for coastal coho on the Umpqua River in 2025. FFGS is based out of Roseburg, Oregon and owned and operated by Craig Augustynovich. FFGS and Mr. Augustynovich strongly oppose ODFW’s proposal to not open the Umpqua river for wild coho retention on the Umpqua River because it will be devastating to FFGS’s guiding business, as well as the entire local economy that relies on the estuary salmon fishery in Winchester Bay and the Umpqua River. In addition, the scientific basis for not having a wild coho retention season is highly questionable. FFGS urges the Commission to consider a limited wild coho retention season in 2025, consistent with other rivers up and down the Oregon coast.

ODFW states on their website that a strong wild coho return is expected this year and retention seasons are being proposed throughout the Oregon coast but notes that the “one exception is the Umpqua River, where no wild coho fishery is being proposed.” ODFW’s stated justification is that the “Umpqua Basin had a very low coho return in 2022 (the parents of adults returning this year), particularly in the South Umpqua population where no adult coho were observed during ODFW spawning ground surveys.” FFGS disagrees with this rationale.

The reliability and efficacy of the surveys that ODFW conducted on the South Umpqua are highly questionable. Only 16 sites across just 10.5 miles were surveyed on the South Umpqua in 2022.<sup>1</sup> In comparison, in 2011, ODFW surveyed 27 sites across 19 miles of the South Umpqua River and estimated a return of almost 50,000 adult coho.<sup>2</sup> It appears that due to budget cuts, ODFW is no longer surveying an adequate number of sites or stream miles in the South Umpqua River to be able to accurately estimate abundance.

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<sup>1</sup> <https://odfw-oasis.forestry.oregonstate.edu/sites/default/files/2024-01/2022CohoAnnualReport.pdf>

<sup>2</sup> <https://odfw-oasis.forestry.oregonstate.edu/sites/default/files/2023-01/2011CohoAnnualReport.pdf>



Dominic Carollo  
Re: Umpqua River Coastal Coho Fishing Regulations for 2025  
August 4, 2025

Further, the prior year's (2021) return was estimated at 14,403 adult coho. It simply is not believable that no coho returned to the South Umpqua River in 2022. It is essential that spawning surveys be conducted at the right places, at the right times, and under the right water conditions to be valid and useful. It is questionable whether any of those criteria were met with respect to the surveys that were performed in 2022. FFGS urges ODFW to reevaluate its coho surveying program in the Umpqua Basin. Not getting the surveys right has drastic consequences for the local economies and communities that depend on coastal fisheries.

FFGS would also like to note that, despite estimating a zero fish return for the South Umpqua, the total estimated return for the entire Umpqua Basin in 2022 was 9,632 adult coho, compared to 8,049 for the Lakes basin (Siltcoos, Tahkenitch, and Tenmile) in 2022. It does not make sense that ODFW is proposing a 1/5 wild coho retention season for the lakes and, yet, no retention season for the Umpqua Basin. Further, ODFW does not have any spawning survey data, nor adult return estimates, for the Necanicum River, Nehalem River, Tillamook Bay, Nestucca River in 2022 and, yet, ODFW is proposing a 1/3 retention season for those rivers. Based on these factors, it would appear that ODFW is arbitrarily singling out the Umpqua Basin for a closure to wild coho retention. One has to wonder if ODFW would have proposed wild coho retention in the Umpqua Basin if, like the North Coast rivers, ODFW did not conduct any surveys at all in 2022 in the South Umpqua.

FFGS urges ODFW to publicly acknowledge that the spawning surveys performed in the South Umpqua in 2022 were not indicative of a zero fish return and, consistent with ODFW's approach to other basins along the Oregon coast, propose a limited wild coho retention season in the Umpqua estuary.

Sincerely,



Dominic M. Carollo  
Attorney at Law

DMC/klh

Cc: Anika Marriott, Esq.

Client





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June 3, 2025

Oregon Fish and Wildlife Commission  
4034 Fairview Industrial Drive SE  
Salem, OR 97302  
[ODFW.Commission@odfw.oregon.gov](mailto:ODFW.Commission@odfw.oregon.gov)

## **Re: Fishing Regulation Changes for 2025 Oregon Coastal Fall Chinook Salmon**

Dear Commissioners:

Please accept the following comments on behalf of Fins and Feathers Guide Service, LLC (“FFGS”) on ODFW’s proposed rule changes for the 2025 sportfishing regulations in the Umpqua District at OAR 635-016-0500. FFGS strongly opposes ODFW’s proposal to close salmon angling and wild chinook retention on the Umpqua River because it will be devastating to FFGS’s guiding business, as well as the entire local economy that relies on the estuary salmon fishery in Winchester Bay and the Umpqua River. In addition, the scientific basis for closing the chinook fishery is highly questionable. FFGS urges the Commission to consider a limited wild chinook season as an alternative to the drastic and unnecessary closure proposed by ODFW.

FFGS understands that management of coastal fall chinook is guided by the Oregon Coastal Multi-Species Conservation and Management Plan (“CMP”). ODFW states in the Agenda Item Summary that the Umpqua fall chinook return was just 1,318 fish and that, based on the Coastal Fall Chinook Sliding Scale adopted as part of the CMP, wild harvest must be closed. However, as recently recognized by the Oregon Court of Appeals, the CMP is “not intended to be a rigid recipe” and that “alternative actions” may be warranted. *Siletz Anglers Ass’n v. Fish & Wildlife Comm’n*, 336 Or. App. 272, 283, 561 P.3d 174, 183 (2024) (citations omitted). Here, ODFW estimated 2024 fall chinook escapement at 1,318 fish but is nevertheless estimating a 2025 return of 4,710 fish, which is above the critical abundance threshold and enough to permit at least a limited wild chinook fishery. Although the Sliding Scale calls for averaging the previous year return with the forecasted return, which is below the critical abundance threshold, ODFW is not bound to follow that formula under *Siletz Anglers* and the flexibility afforded under the CMP.

Further, FFGS questions the reliability of ODFW’s estimate of the 2024 chinook return. Available harvest data indicates that 1,820 fall chinooks were harvested in the mainstem Umpqua River and bay in 2024 from July through October.

<https://www.dfw.state.or.us/resources/fishing/docs/sportcatch/ChinookSalmonByMonthAndWaterbodyCode2024.pdf>. That would mean, if ODFW estimate of escapement was accurate, that angler harvest exceeded escapement. That is very unlikely, if not implausible. My office has requested data ODFW relied upon for its estimate of 2024 escapement but that data has not been

Dominic Carollo

Re: Fishing Regulation Changes for 2025 Oregon Coastal Fall Chinook Salmon

June 3, 2025

provided. This lack of transparency is very concerning. However, it appears likely that the spawning surveys ODFW relied upon were inadequate to determine an accurate estimate of 2024 escapement. FFSG has guided fall chinook fishing trips in the Umpqua estuary for many years and last year's return was on par with the previous four-to-five years of fall chinook returns. FFSG believes that ODFW has severely underestimated the 2024 fall chinook escapement for the Umpqua River. ODFW needs to work collaboratively with local guides and other stakeholders to ensure that fall chinook are being surveyed and monitored in the appropriate locations and times of the year to ensure an accurate estimate of population abundance and escapement.

Based on the above, FFSG requests that ODFW and the Commission consider a limited fall chinook retention fishery in the Umpqua River and bay. FFSG would support a daily bag limit of one (1) wild chinook salmon with no more than two (2) wild chinooks retained for the period in the aggregate. Closing the fishery is entirely unnecessary and will cause drastic economic damage to FFSG and the many other fishing guides and local businesses that rely on the Umpqua estuary fishery.

Sincerely,

A handwritten signature in black ink, appearing to read 'DMC', with a stylized flourish extending to the right.

Dominic M. Carollo

Attorney at Law

DMC/klh