Exhibit D
Supplemental
Public Correspondence Received as of June 23, 2026

1.Name

Bob Buckman

2.Email Address

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3.Affiliation or type of stakeholder (Ex. general public, state government...)

Sport angler and retired ODFW staff

4.Comments

I am providing my comments on the proposal for 2026 coho salmon angling regulations for Oregon Coast Rivers. Prior to my retirement in 2013 I was an ODFW District Fish Biologist in Newport and was the lead developer of the 2009 plan for these fisheries. This Fisheries Management and Evaluation Plan (FMEP) was needed to get NOAA sanction since coho are ESA listed.

I am generally supportive of the staff proposal with the exception of the Alsea closure.

I oppose the Alsea closure because it is singularly based on achieving the seeding criteria as determined using an obsolete 1998 habitat model (ODFW Information Report 98-4). This model is obviously flawed as a basis for management of these fisheries. In some locations it arbitrarily forces restrictions of fisheries while in other it has criteria that are low to the point they do nothing to provide guidance needed for conservation or achieving seeding levels. I have discussed this 1998 habitat model with ODFW staff (DR. Chris Lorion and others) who agree it is not scientifically credible as applied to today's management. The author of the 1998 report (Tom Nickelson) states in the report that criteria are only appropriate at low marine survival similar to the 1990s (3 %) and are "meaningless" at higher marine survival (~7.5 % recent years).

As an example of the problems with the 1998 habitat model, I compared application in the Tillamook and Alsea basins. The Tillamook Basin is 28 % larger than the Alsea and has 249 miles of coho habitat compared to 221 in the Alsea. The full seeding criterion from the habitat model is 2,000 for Tillamook and 15,100 for the Alsea. This means the Tillamook streams need eight spawners per mile while the Alsea needs 68 spawners per mile. Coho habitat and performance is roughly similar in the Tillamook and Alsea streams so a criterion that is eight times higher in the Alsea is obviously wrong (on the high side). Conversely, the Tillamook estimate is wrong on the low side. Actual coho spawners over the last three years averaged 62 per mile in Tillamook and 44 per mile in the Alsea.

Fortunately, there is a wealth of monitoring information on coastal coho since the 1990s that can be used to manage these fisheries. This includes monitoring of adult spawners across all watersheds, monitoring of juvenile coho during the summer across the landscape, and intensive monitoring on select tributaries where spawners and subsequent smolts are measured. This information is strong scientifically. The 2009 FMEP indicates these data sets will be considered in management of these fisheries.

The 2009 FMEP was developed with the expectation we would have a few trial fisheries in basins with stronger coho populations (Coos and Yaquina). Following these fisheries within three to six

years the FMEP states it will be updated and revised with specific reference to the 1998 habitat model based seeding criteria. Unfortunately, this update was never done and the FMEP guiding the fisheries remains exactly as written in 2009.

My interpretation is there is not a legal requirement to use the specific values from the habitat model for in basin coho management. There is precedent for approval of fisheries that do not meet the 1998 habitat model criteria in the proposal for the Alsea in 2024 and there is consistent approval of a Beaver Creek fishery which was not even considered in the 1998 model. There is flexibility for staff to assess the "seeding criteria" based on the best available science and not be locked into an obviously flawed 1998 model. NOAA in all likelihood will accept a 2026 Alsea fishery based on use of credible science to assess the proposal.

In conclusion I recommend modifying the proposal to include a fishery in the Alsea similar to last year. I also recommend total elimination of the 1998 habitat model criteria as a consideration in these in-basin fisheries.

March 5, 2026

Oregon Department of Fish & Wildlife
4034 Fairview Industrial Drive SE
Salem, OR 97302

Attn: Marine Resources/Commercial Licenses

Hello Sir/Madam:

I am a recreational fisherman and have greatly enjoyed crabbing at the Oregon coast over many years. One of my favorite crabbing sites has been Alsea Bay at Waldport. I usually fish in the fall but circumstances resulted in me fishing in January this year. Crab were abundant, but over 95% of the adult crab we pulled up were female. I've never seen this type of sex imbalance in previous years. The locals told me that this was a result of commercial fisherman who stripped out the legal male crabs.

I was amazed to hear that commercial licenses are granted for crabbing Alsea Bay. This is such a tiny habitat that it is understandable and predictable that the harvestable crab were obliterated. Commercial harvesting in this small habitat is analogous to allowing commercial fishing in lakes such as Suttle or Odell Lakes. I don't see any commercial trawls or gill netting in Oregon lakes, yet your agency has allowed commercial fishing in a small harbor that is suitable for recreational fishing. Most of us recreational crabbers lack the equipment to venture out into the ocean and it seems both fair to recreational fisherman to reserve these small, sheltered habitats. Futhermore, how does the decimation of the male crab population best serve the crab resources?

I am not anti-commercial fishing. I have a nephew who is a commercial fisherman and want to see a healthy commercial fishery. However, the use of commercial harvesting in small, isolated habitats does not benefit the larger commercial community.

I urge you to reconsider your decision to allow commercial crabbing in Alsea Bay. It's bad for the resource and provides questionable return in licenses fees for ODFW.

Sincerely,

Joe Eilers

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Bend, OR 97701