



Oregon Chapter American Fisheries Society

PO Box 8062, Portland, OR 97207-8062

www.orafs.org

October 15, 2024

To: Oregon State Marine Board
435 Commercial St. NE., Ste 400 Salem, OR 97301
E-mail to: jennifer.cooper@boat.oregon.gov

On behalf of over 400 members of the Oregon Chapter of the American Fisheries Society (ORAFS) we submit this letter to the Oregon State Marine Board regarding the opportunity to establish jet boat rules on the Upper Rogue River. ORAFS members represent fisheries and aquatic science professionals from federal, state, and tribal agencies, colleges and universities, and diverse private employers. Our mission is to improve the conservation and sustainability of Oregon fishery resources and their aquatic ecosystems for long-term public benefit by advancing science, education and public discourse. We advocate for and support policies and laws that benefit the conservation and sustainability of Oregon's fishery resources. The Rogue River is one of Oregon's premier rivers.

We understand that there are currently no regulations regarding jet boat use on the Upper Rogue River upstream from Table Rock Road, and that commercial jet boats that carry 10 to 25 people, totaling 1,000's of customers each year, are routinely providing services in this portion of the Upper Rogue River. For ORAFS members there is particular concern regarding the potential impacts of jet boat use on the spring chinook salmon that hold and spawn in the Upper Rogue River. A 2024 Biological Status Review of Oregon Coast and Southern Oregon/Northern California Coastal Chinook salmon by NOAA (U.S. Department of Commerce, NOAA Technical Memorandum NMFS-NWFSC-189), which includes the Rogue River noted that "*the natural-origin spring run in the Rogue River appears to have been relatively stable at about 10,000 or fewer spawners since approximately 1990 (NOAA 2024). This is considerably lower than the pre-1990 abundance, which was typically >15,000 and commonly >30,000.*" Additionally, the risk assessment described the spring run as being a substantial component of the abundance of the Rogue River system and described the spring run as important to the long-term viability of the population.

With the spring run life history described as having a moderate to high risk of extinction, it is important to consider actions that would contribute to the decline of those fish. Conditions that could contribute to potential declines in Rogue River salmon populations include habitat impacts from jet boats. Jet boat use impacts include wake erosion and hydraulic turbulence that disrupts spawning areas, disrupts juvenile spring Chinook migrating from upper river rearing areas to the Pacific Ocean, stresses adult salmon resting and holding in the upper river during the summer, mixes river sediments, and disturbs riparian habitat. The shallow nature of portions of the Upper Rogue creates a need for jet boats to operate at high speeds that disrupt both the river and river-

based recreational uses. Additional impacts to summer steelhead which also hold in the Upper Rogue River, other native resident fishes, and riparian dependent wildlife are also of concern from the impacts of unregulated jet boat use.

Please include ORAFS in the rulemaking record as supporting the limit of jet boat use to downstream of Table Rock Road and motor sizes of 15 horsepower or less above Table Rock Road. We also understand there is a conflict between the Denman Wildlife Area, which prohibits motorized boat use and jet boat traffic which travels through the wildlife area. The Rogue River supports many values including designated Wild and Scenic values, world-renowned white-water rafting, recreational fishing, and native wildlife. ORAFS believes that appropriately regulated jet boat use can be compatible with other uses of the Rogue River while conserving its unique fisheries and aquatic system.

On behalf of ORAFS, respectfully,

A handwritten signature in black ink that reads "Michele Weaver". The signature is fluid and cursive, with a long, sweeping underline that extends to the right.

Michele Weaver – President, ORAFS, president@orafs.org