

August 5, 2025

Justin “J” Shirley
U.S. Fish and Wildlife Service
1849 C Street, NW
Washington, DC 20240

I am writing to bring urgent attention to the ongoing mismanagement of river and salmon restoration policy on the Olympic Peninsula, specifically in Clallam County, Washington. Recent policy shifts, driven by a global consortium and endorsed by federal, state, county, and tribal authorities, have resulted in severe negative impacts on both salmon spawning and property owners.

On the Jamestown S’Klallam Tribe’s reservation, the Jimmycomelately Creek restoration project was developed using a rigorous, collaborative scientific approach. This project was carefully designed and implemented by federal, state, county, and tribal stakeholders, and the results and methodology are well-documented ([see project links below]). The strategy involved relocating the riverbed with a focus on habitat restoration and property protection, and it provided a transparent, science-based model for river management.

Key documents:

- [Preliminary Restoration Plan](#)
- https://jamestowntribe.org/wp-content/uploads/2018/09/1-jcl-prelim_final.pdf
- [Lessons Learned](#)
- <https://jamestowntribe.org/wp-content/uploads/2018/09/2-jcl-lessonslearned10-31-08.pdf>
- [Channel Design for Realignment](#)
- [https://jamestowntribe.org/wp-content/uploads/2018/09/5-jcl-Channel design for realignment.pdf](https://jamestowntribe.org/wp-content/uploads/2018/09/5-jcl-Channel%20design%20for%20realignment.pdf)
- [Preliminary Final Report](#)
- <https://jamestowntribe.org/wp-content/uploads/2018/09/4-jcl-Prelim-Final.pdf>
- [Monitoring Plan](#)
- <https://jamestowntribe.org/wp-content/uploads/2018/09/6-jcl-Estuary-Monitoring-Plan-Final.pdf>

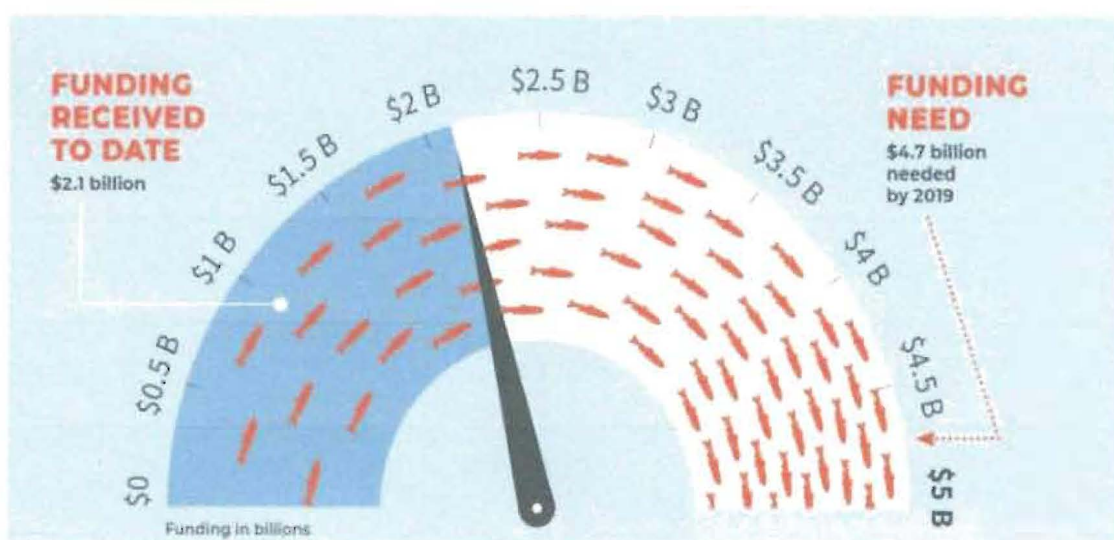
Despite this established, successful framework, recent policy has shifted toward “natural” river management approaches that intentionally flood properties, making them eligible for government buyback at below-market value. There is written evidence that this is a

purposeful strategy, which not only undermines property rights but departs from proven salmon recovery science. On rivers like the Dungeness—already challenged by a rain shadow—forced rechanneling and ineffective riparian projects have lowered river levels, increased predation, and failed to support salmon recovery.

<https://pspwa.app.box.com/s/teef6l6xjin09dtio8o0pl29zt2p3nun/file/900846319217>

- **Property Buy-Back Program** - We need a well-funded buy-back program for parcels that are and will soon be flooded, or otherwise negatively affected, because of climate change. With such a program, we need to make sure we're using taxpayer dollars wisely and not paying full price for parcels that will be devalued because of the risks from climate change, but instead are helping the ecosystem become more resilient. Departments of community development within our cities and counties need the capacity to be able to administer such local programs. The NODC climate change planning grant might be able to provide some level of assistance in this regard.

The results speak for themselves: Since 1999, Washington State has spent approximately \$2.1 billion on salmon restoration, yet returns remain abysmal. The departure from the Jimmycomelately science-based model in favor of subpar, inconsistent practices is a root cause.



<https://stateofsalmon.wa.gov/progress/funding/>



<https://wdfw.wa.gov/sites/default/files/hgmp-esa-documents/ESA%20Requirements/Dungeness%20River/Dungeness%20Salmon%20and%20Steelhead%20NOAA%20Biological%20Opinion.pdf>

Endangered Species Act (ESA) Section 7(a)(2) Biological Opinion, Conference Opinion, and Magnuson-Stevens Fishery Conservation and Management Act Essential Fish Habitat (EFH) Consultation

National Marine Fisheries Service (NMFS) Evaluation of Three Hatchery and Genetic Management Plans for Dungeness River Basin Salmon under Limit 6 of the Endangered Species Act Section 4(d) Rule

NMFS Consultation Number: NWR-2013-9701

Action Agencies: National Marine Fisheries Service and Bureau of Indian Affairs

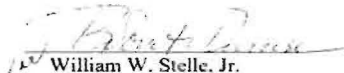
Affected Species and Determinations:

ESA-Listed Species	Status	Is the Action Likely to Adversely Affect Species or Critical Habitat?	Is the Action Likely To Jeopardize the Species?	Is the Action Likely To Destroy or Adversely Modify Critical Habitat?
Puget Sound steelhead (<i>Oncorhynchus mykiss</i>)	Threatened	Yes	No	No
Puget Sound Chinook salmon (<i>O. tshawytscha</i>)	Threatened	Yes	No	No

Fishery Management Plan That Describes EFH in the Project Area	Does the Action Have an Adverse Effect on EFH?	Are EFH Conservation Recommendations Provided?
Pacific Coast Salmon	Yes	Yes

Consultation Conducted By: National Marine Fisheries Service, West Coast Region, Sustainable Fisheries Division

Issued By:


William W. Stelle, Jr.
Regional Administrator

I urge the U.S. Fish and Wildlife Service to:

- Conduct an independent review of all current and proposed river management and property buyback policies on the Olympic Peninsula
- Require implementation of transparent, science-based river restoration models, such as those used in the Jimmycomelately Creek project
- Ensure that property owners are protected from deliberate flooding and unfair buyback tactics
- Establish and enforce consistent, equitable policy for salmon recovery across all rivers in the region

The region needs a fair and equitable policy overhaul. As the situation stands now, billions have been wasted on ineffective salmon spawning strategies that have been proven not to work. The current situation is inequitable and unsustainable. It is imperative that the U.S. Fish and Wildlife Service step in to ensure that river management policy is fair, scientifically sound, and in the true interest of both salmon recovery and the affected communities.

My strategy for the region is based upon the Jimmycomelately science which have been resisted again and again by a local global policy consortium that refuses to listen to any available alternatives.

Millions are also being wasted on fish culverts leading to steep grades of spawning area that will not provide the spawning returns they claim.

It all adds up to total mismanagement . Please hold official proceedings that pit the Jimmycomelately science against any current river management policies being implemented.

Thank you for your attention to this matter.

Sincerely,



John Worthington
303 S.5TH AVE.G-53
Sequim WA. 98382