



DIVISION OF  
CORPORATION FINANCE

UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON, D.C. 20549

Mail Stop 4720

October 9, 2009

*By U.S. Mail and Facsimile to 971-544-3750*

Ronald L. Farnsworth  
Executive Vice President and Chief Financial Officer  
Umpqua Holdings Corporation  
One SW Columbia Street  
Suite 1200  
Portland, Oregon 97258

**Re: Umpqua Holdings Corporation  
Form 10-K for the Fiscal Year Ended December 31, 2008  
and related filings  
File No. 000-25597**

Dear Mr. Farnsworth:

We have completed our reviews of your Form 10-K and related filings and have no further comments at this time.

Sincerely,

Todd K. Schiffman  
Assistant Director