



Quinault Indian Nation

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Ms. Dorothy Lowman, Chair
Pacific Fishery Management Council
7700 NE Ambassador Place #200
Portland OR 97220

October 28, 2014

Dear Ms. Lowman,

Per Title 50 of the Code of Federal Regulations (CFR), part 660, the Quinault Indian Nation has been exercising its treaty right to participate in the Pacific sardine fishery since 2012.

After reviewing the alternatives in the Environmental Assessment (November agenda item E.2.a) and the Coastal Pelagic Species Management Team report (November agenda item E.2.b), the Quinault Indian Nation urges you to adopt Sub-alternative 2.b. as your Final Preferred Alternative of Pacific sardine Harvest Parameters. Bounding the FRACTION parameter at 10-20 provides a conservative and safe approach to future sardine fishing, while balancing the needs of Treaty, as well as Non-Treaty, fishers and related economic communities.

Amendment 8 of the Coastal Pelagic Species (CPS) Fishery Management Plan (FMP) was a unique and innovative approach to matching environmental factors to harvest guidelines and has served well in preventing overfishing of the Pacific sardine resource. New models of fishery performance have been integrated into sardine management since then which show that bounding FRACTION at 10-20 with the CalCOFI temperature data provides the best mix of economic performance and biological performance.

Sub-alternative 2.b. provides a conservative approach to fishery management that reduces the volatility and the chances of having fishing curtailed to the point of elimination in any given year. We urge the Council to fully recognize the forethought that was put forth in Amendment 8 in setting a CUTOFF of 150,000 metric tons (mt). The FMP provides for zero targeted fishing when biomass levels go down to this point. 150,000 mt is, based on average size, at least 700 million fish that will remain in the water.

Pacific sardines are an important Tribal resource, and Sub-alternative 2.b. is the best available alternative for maintaining our treaty-right fisheries while minimizing impacts to the resource.

Sincerely,

A handwritten signature in black ink that reads "Ed Johnstone".

Ed Johnstone,
Quinault Fisheries Policy Spokesperson

CC David Sones, Tribal Seat, Pacific Fisheries Management Council
Phil Anderson, Director, Washington Department of Fish and Wildlife
Will Stelle, Administrator, NOAA Fisheries West Coast Region