



Quinault Indian Nation

POST OFFICE BOX 189 • TAHOLAH, WASHINGTON 98587 • TELEPHONE (360) 276-8211

February 28, 2016

Ms. Dorothy M. Lowman
Chair
Pacific Fisheries Management Council
7700 SE Ambassador Place, Suite 101
Portland, OR 97220-1384

RE: Quinault Indian Nation comments on Council Adoption of Initial 2016 Salmon Management Measure Alternatives

Dear Chairwoman Lowman and Council Representatives,

The Quinault Indian Nation (QIN) offers these comments to assist the Pacific Fisheries Management Council (Council) in developing recommendations for initial 2016 salmon management measure alternatives.

The lingering hostile marine environment has affected salmon survival throughout the Washington coast and Puget Sound. Anomalously warm ocean conditions termed “the blob” that began in the winter of 2013 strengthened throughout 2014 and 2015 and a strong El Nino also formed in the spring of 2015. Lower than expected Coho returns throughout the Pacific coast in 2015 suggested poor juvenile salmon feeding conditions existed in the spring of 2014. Physical and biological ocean ecosystem indicators suggest that juvenile salmon feeding conditions continued to deteriorate in 2015. This trend is reflected in critically low 2016 Coho salmon abundance predictions for nearly all of the Coastal and Puget Sound Coho management units (MUs). Spawning escapements absent any fishing mortality for many of the natural stocks are expected to fall significantly below spawning escapement objectives. It is imperative that the Council consider the uncertainty of salmon survival conditions and resulting impacts on the reliability of the planning models that are relied upon to estimate stock distribution and fishery impacts. A precautionary management plan should be adopted for 2016 salmon fisheries.

The Council must comply with obligations to provide for treaty protected fisheries for Coastal Coho as required under Hoh v. Baldrige while developing ocean salmon fishing alternatives. The Council should consider mitigating risk of overfishing natural Coho stocks by reducing fisheries proportionate to their level of uncertainty. In particular, the high level of uncertainty in abundance forecasts and the impacts of mark selective fisheries on unmarked fish justify precautionary management measures are adopted in 2016. The level of impact to natural stocks by mark-selective fisheries is sensitive to both the assumed release mortality rate and the mark rates in the fisheries which are driven by forecasts of hatchery Coho originating in the Columbia River. The large error in 2015 forecasts and the unknown influence that environmental conditions may have on jack return rates used to forecast adult hatchery Coho returns to the Columbia River are reasons for limiting mark-selective fisheries that rely on the availability of hatchery-origin fish. Furthermore, in-season actions should not liberalize Coho retention limits if quotas are not being attained due to lower than expected landings. The regulatory change allowing unmarked Coho retention in the ocean recreational fisheries last September likely had a disproportionate contribution to higher exploitation rates on natural Coho stocks.

Thank you for considering our comments.



Ed Johnstone
Fisheries Policy Spokesperson
Quinault Indian Nation