



Pacific Fishery Management Council

7700 NE Ambassador Place, Suite 101 Portland, OR 97220-1384
Phone 503-820-2280 | Toll free 866-806-7204 | Fax 503-820-2299 | www.pcouncil.org
Philip Anderson, Chair | Charles A. Tracy, Executive Director

October 16, 2018

Mr. Ed Johnstone, Fisheries Policy Spokesperson
Quinault Indian Nation
1214 Aalis Street
Tahola, WA 98587

Dear Mr. Johnstone:

Thank you for your letter of October 4, 2018, regarding the draft rebuilding plan for Queets River natural coho and the Pacific Fishery Management Council (Council) process for completing that effort. As you may know, the Council's Salmon Fishery Management Plan requires its Salmon Technical Team (STT) to lead the development of a rebuilding plan when a stock is determined to be overfished. The Council must have an adopted rebuilding plan in place within two years of the determination.

While the STT has the responsibility for presenting the rebuilding plans to the Council, they are expected to reach out to the appropriate technical and managerial experts from state and tribal management entities to assist in assembling the needed data, analysis, drafting, and reviewing of the report text. I would like to acknowledge the significant contribution of Quinault Indian Nation (QIN) staff as they have been very responsive and engaged with the efforts to develop a draft rebuilding plan for Queets River coho.

The STT's work in developing the rebuilding plan is intended to provide an assessment of the cause of stock declines so that state and tribal policy makers can have informed discussions about how to address the issues identified as the cause for the decline in the stock. The draft alternatives in the STT report are intended to suggest possible sideboards and to provide policy makers with initial considerations for establishing an appropriate range of alternatives for further review.

Of particular interest, as stated in the most recent draft [STT report](#) for Queets River coho:

"Alternative III: Suspend all salmon-directed ocean and in-river fisheries from the U.S/Canada border to Cape Falcon until rebuilt status is achieved. Projected rebuilding time is two years (see Section 4.3). This is considered an 'action' alternative, representing TMIN.

Alternative III includes fisheries that the Council does not have jurisdiction over. It also does not meet the purpose and need because it would restrict tribal fisheries in a manner that is inconsistent with their treaty right. Alternative III is provided solely to serve as a bookend in the analysis of rebuilding


probabilities over a ten year period when assuming an exploitation rate of zero. This Alternative fulfills the requirement of National Standard 1 in calculating the minimum time (TMIN) estimated to achieve rebuilt status.”

At their November meeting, the Council will be reviewing the draft STT rebuilding plans and providing direction for a range of alternatives to be considered for further review and analysis prior to adopting a final rebuilding plans at the March 2019 Council meeting. It is imperative that the Council get the advice and counsel from the QIN and the Washington Department of Fish and Wildlife to inform the designation of an appropriate range of reasonable alternatives. Given the role of the QIN as a co-manager of the Queets coho stock, I would like to invite your formal participation at the November Council meeting so the Council can hear directly from you relative to the draft rebuilding plan, including the appropriate alternatives and analysis for rebuilding Queets River coho. To be clear, the Council acknowledges and respects the QIN’s treaty right, the role of government to government consultations, and the QIN’s role as a co-manager of this stock. It is imperative that the Council, in fulfilling its responsibility to conduct its activities in accordance with the Magnuson-Steven Fishery Conservation and Management Act, have the benefit of the advice and expertise of the QIN in formulating the rebuilding plan for this important coho stock.

I hope the draft STT report will serve its intended function and, in part because of the thoughtful contribution that the QIN staff has made in the development of the draft, will provide you with sufficient background and analyses to assist you in advising the Council as it moves toward the public review process of the rebuilding plan. I am happy to coordinate with you and the tribe’s representative on the Council to ensure that your voice is appropriately heard prior to the Council taking action on this item at the November and future meetings.

Thank you for bringing this matter to my attention, please feel free to contact me with any additional concerns you may have.

Sincerely,



Charles A. Tracy
Executive Director

CAT:rdd

Cc Mr. Phil Anderson
Mr. Marc Gorelnik
Mr. Barry Thom
Mr. Ryan Wulff
Ms. Susan Bishop
Mr. Kelly Susewind
Mr. Kyle Adicks
Mr. Joe Oatman

Mr. David Sones
Dr. Gary Morishima
Mr. Rob Jones
Ms. Robin Elke
Mr. Mike Burner
Salmon Technical Team