Statement by the Quinault Indian Nation to the Pacific Fisheries Management Council
Fresno, CA
March 10, 2024

Members of the Council:

My name is Cleve Jackson. I serve as the Fisheries Policy Spokesperson for the Quinault Indian Nation (QIN), a Tribe with federally reserved rights to harvest fish in the ocean and a co-manager of shared resources. Quinaults have relied on and used the natural resources of the land, estuaries, rivers, and the ocean environments for millennia. As a co-manager, QIN is focused on maintaining the long-term viability and resilience of our salmon. The Tribe is investing in aggressive habitat restoration projects and monitoring programs in every system where we fish. Habitat restoration and protection efforts are underway in the Clearwater basin, the upper Quinault River and within the Chehalis and Humptulips basins. We will continue to dedicate time and resources to collaborating with co-managers and coastal fisheries management entities through the PFMC process to responsibly manage fisheries.

Under the 1856 Treaty of Olympia, the United States and its agencies have a fiduciary trust responsibility to protect the abundance and productivity of fishery resources. Pursuant to the decision in Hoh v Baldrige, the Pacific Fisheries Management Council must adopt ocean salmon fisheries that provide for equitable sharing of the salmon resource and do not impede the management and conservation goals of each treaty signatory tribe on a river by river, run by run basis.

Unfortunately, the processes employed by the PFMC have not consistently protected our salmon resources and ensured our ability to exercise our treaty-protected rights. The Queets natural coho stock has been designated overfished three times (1997-1999, 2006-2008, 2014-2016) since the Magnuson-Stevens Fishery Conservation Act was amended in 1996 to address issues concerning overfishing and overcapacity. The stock just reached rebuilt status after improved survival conditions produced a strong return in 2022 with a spawning escapement exceeding 12,000 coho.

A rapidly changing climate is adversely impacting both freshwater and marine environments resulting in increasing uncertainty in the reliability of management methods, tools and models that are based on presumptions of relative stability. A few years ago, unprecedented high temperatures were experienced during the “blob” and ocean temperatures reached record highs in 2023. Moderate to high returns were expected in 2023, but poor ocean catch rates followed by some of the lowest terminal area coho harvest ever recorded in many of the Washington coastal rivers prompted emergency closure of QIN’s coho fisheries.

February 2024 marked the 9th consecutive month when temperatures reached record highs and a strong el niño event is forecast to continue into the late spring. These conditions increase uncertainty in the abundance, distribution, and migratory behavior of various stocks and the reliance on average natural and fishery-related incidental mortality (FRIM) rates incorporated into FRAM.

In 2024, the Quillayute and Hoh natural coho forecasts are low. Current modeling indicates that Quillayute coho will not meet the escapement floor without further reductions to fisheries. QIN believes

that the upcoming season must be crafted in accordance with precautionary management principles to safeguard salmon stocks from overfishing.

Precautionary management requires consideration of major sources of uncertainty that will contribute to error in projections of stock-specific abundance, fishing mortality and escapement. The first major source of uncertainty for ocean salmon management is the annual forecasts of abundance which drive ocean fishery modeling. The second source of uncertainty stems from the assumptions that are embedded in the tools and models employed in preseason planning and in-season management. The third source of uncertainty stems from the conduct of fisheries, such as market conditions for commercial fisheries and recreational experiences for sport fishing. The fourth source of uncertainty stems from the physical environment – temperature, upwelling, precipitation, algal blooms, and hypoxia. Finally, a host of biological uncertainties come into play, such as relative abundance and availability of comingled salmon species, differential survivals of hatchery and wild fish, predation, food webs, marine distribution and migration patterns.

Terminal fisheries adjust to the actual returns by using effort controls and harvest rates to establish set fishing schedules as opposed to adjusting fisheries to attain quotas. Terminal fisheries are not immune to increasing uncertainty due to environmental variability. Recent severe drought conditions have made it increasingly difficult to manage in-river fisheries. QIN is developing new management strategies to address sources of uncertainty.

For ocean fisheries, the range of options under consideration should include explicit provisions for precautionary management. Preseason quotas and fishing patterns should include conservative options anticipating continuation of adverse environmental conditions and above average natural and incidental fishing mortality rates. Due to the complexity of mixed stock ocean salmon fisheries in-season updates to stock abundance forecasts are not feasible. Ocean fishing regulations such as retention restrictions and quotas should include requirements to ensure co-manager agreement and a sound scientific basis. Unfortunately, the methods employed by the PFMC in 2023 for “impact neutral” adjustments to ocean coho-directed fisheries were seriously flawed and lacked efforts to secure co-manager agreement in advance.

We appreciate that changing the structure of fisheries can be difficult and contentious. It requires consensus of co-managers and consultation with affected fishing communities. We urge the PFMC to require consultation with the Co-managers before in-season adjustments are pursued and to develop new precautionary measures to safeguard the sustainability of the salmon resource and the fisheries that rely on these resources.