

## TRIBAL REPORT ON 40 GROUND FISH SPECIES SELECTED FOR ADDITIONAL 10 FACTOR ANALYSIS

The Makah Tribe, the Quileute Tribe, the Hoh Tribe, and the Quinault Indian Nation (the “Coastal Treaty Tribes”) have been following PFMC discussion and action related to this stock definitions agenda item, also known as “Phase 2”. After 40 species were identified for additional analysis in March of 2025, the Coastal Treaty Tribes carefully considered Tribal commercial landings since 2000, near-term commercial development opportunities, and subsistence value of each of the 40 species. Following these efforts, 7 species have been identified by the Coastal Treaty Tribes as being of particular importance to commercial and/or subsistence harvest. Those species are black rockfish, blue/deacon rockfish, quillback rockfish, rock sole, sand sole, cabezon, and kelp greenling. This comment letter details the rationale behind highlighting each of these species, and rationale of the Coastal Treaty Tribes for those species remaining in the Pacific Fishery Management Council’s Groundfish FMP.

This report contains aggregated commercial catch data from each of the 4 Coastal Treaty Tribes. While not comprising all Tribal catch for each of these species since 2000 (subsistence landings are not included), the Coastal Treaty Tribes agree that the data presented is generally representative of overall trends in Tribal fisheries and sufficiently illustrates the Tribal position on each of these species.

Finally, the Coastal Treaty Tribes offer no input in this report on the other species being considered under the § 600.305(c) analysis. The Coastal Treaty Tribes are of the opinion that any species known to occur in Washington should have a defined plan for continued assessment, monitoring, and management by the State and/or Tribes before removal from the Groundfish FMP.

### **Black Rockfish**

**Table 1: Tribal catch for black rockfish, 2000 through 2024**

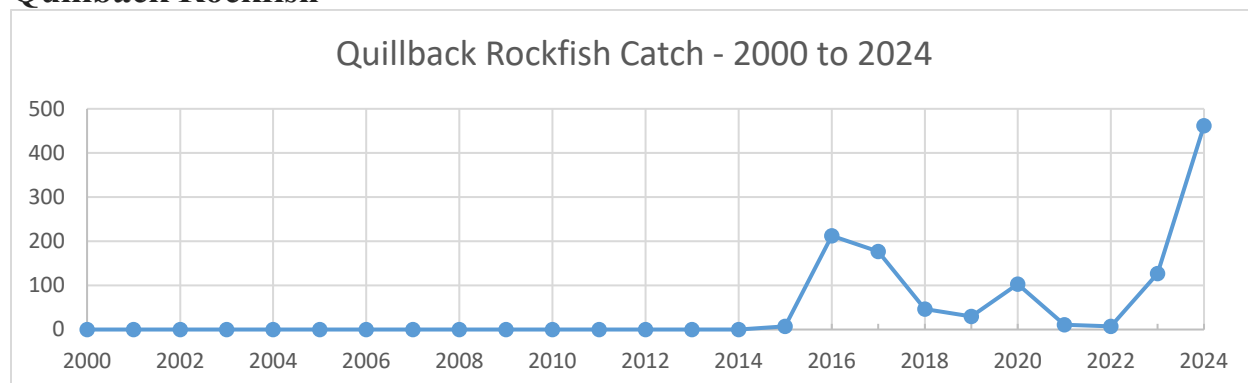
Species	Total mt 2000-2024	# years w/ landings	Ave lbs per year landed	Max lbs in a single year
Black Rockfish	4.50	22	451	3,621

This species has known subsistence value to the Coastal Treaty Tribes, and is actively being considered for directed commercial fishery development as part of a nearshore fishery with cabezon and kelp greenling. Commercial landings consistently occur in the tribal fishery, as detailed in the table above. Only two years out of the last 25 have had no landings of black rockfish.

### **Blue/Deacon Rockfish**

While this species has had limited documented landings in tribal fisheries, the co-occurrence of this species with black rockfish means that, as a directed commercial nearshore fishery develops, it is likely to become commercially important. Additionally, this species is known to have subsistence value to the Coastal Treaty Tribes.

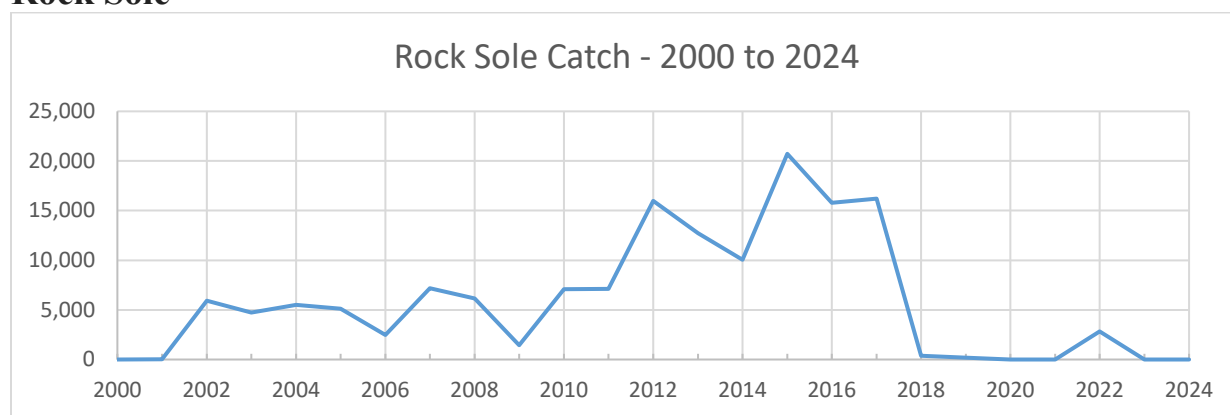
## Quillback Rockfish



**Figure 1: Tribal catch for Quillback Rockfish, 2000 through 2024**

While this species is not the target of a directed fishery, there have been increasing encounters with quillback rockfish in established longline fisheries. As these other fisheries occur in federal waters, it seems appropriate that this species stay in the FMP to facilitate the management and monitoring in association with other federally managed species. Additionally, mortality of this species is likely to increase with the development of a commercial nearshore fishery.

## Rock Sole



**Figure 2: Tribal catch for Rock Sole, 2000 through 2024**

Primarily encountered in the Tribal groundfish trawl fishery, rock sole catch trends changed in 2017 following changes in fishery participation and market opportunity. However, it is anticipated that catch of this species could rebound to prior levels in the event that market pressures once again shifted for participating vessels.

Encompassed as part of the “other flatfish” set-aside, this species remains commercially important to Tribal fisheries. Additionally, the stock status of rock sole is relatively uncertain – as compared to flatfish species of greater focus, such as petrale sole (rock sole was last assessed as a DBSRA in 2011).

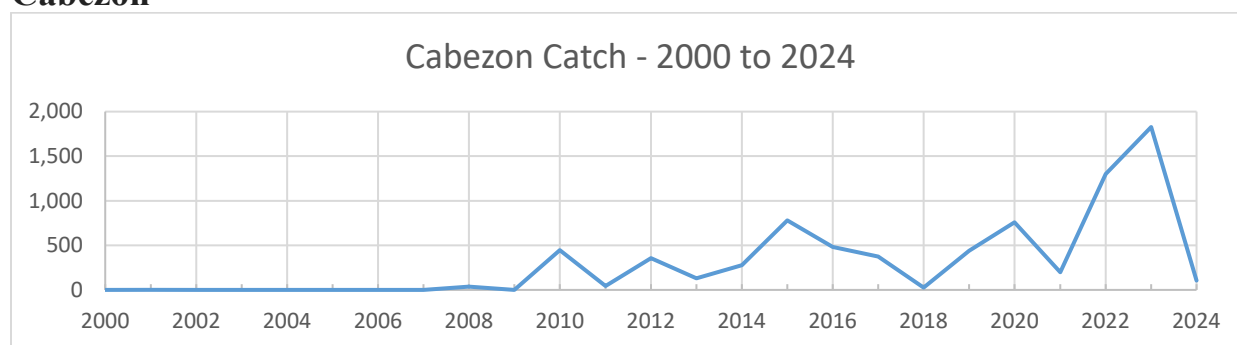
## Sand Sole

**Table 2: Tribal catch for Sand Sole, 2000 through 2024**

Species	Total mt 2000-2024	# years w/ landings	Ave lbs per year landed	Max lbs in a single year
Sand sole	2.19	10	482	3,197

While this species has not been regularly encountered in recent years, the potential for high encounter events still exists. Currently, this species is a component of the “other flatfish” set-aside. With the tribal groundfish trawl fishery continuing to rebuild, the potential for high catch events in existing fisheries, and a relatively unknown stock status, it is important that this species remains in the FMP.

## Cabazon



**Figure 3: Tribal catch for Cabazon, 2000 through 2024**

**Table 3: Tribal catch for Cabazon, 2000 through 2024**

Species	Total mt 2000-2024	# years w/ landings	Ave lbs per year landed	Max lbs in a single year
Cabazon	3.06	16	421	1,300

This species has known subsistence value to the Coastal Treaty Tribes, and a directed commercial fishery is currently in development. Landings began to increase in the 2010s, with steady interest in development of a directed commercial fishery. A set-aside was established in 2023, and there continues to be effort in establishing this directed commercial fishery – despite a disruption in 2024.

## Kelp Greenling

This species has known subsistence value to the Coastal Treaty Tribes, and a directed commercial fishery is currently in development (paired with cabazon). Additionally, as cabazon/kelp greenling are managed in a complex in WA, no specific species code exists for kelp greenling in fishery databases. Given the known subsistence value, potential for directed commercial fishery development, and difficulty in distinguishing existing or future records, this species is in need of continued federal monitoring and management.