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The Tulalip Tribes are federally recognized successors in interest to the Snohomish, Snoqualmie, Skykomish, and other allied tribes and bands signatory to the Treaty of Point Elliott.

Re: Language of Alternative III of the Snohomish Natural Coho Rebuilding Plan

Dear Director Tracy,

10/30/2018

Tulalip Tribes is seriously concerned about the current Management Strategy Alternatives (particularly Alternative III considered in the Snohomish River Natural Coho rebuilding plan). This alternative would 'Suspend all salmon-directed ocean and in-river fisheries from the U.S/Canada border to Cape Falcon until rebuilt status is achieved'. The Council does not have jurisdiction over fisheries in Puget Sound, nor can it infringe on the right of Tribes to exercise their Treaty Rights, so this alternative does not constitute a viable option to consider in the Snohomish Coho rebuilding plan.

Tulalip is also troubled with the way the Alternatives were rushed and modified at the very last minute, without the proper discussion with Tribes affected by this plan. Tulalip technical staff and co-managers assisted the Salmon Technical Staff (STT) throughout the preparation of this plan, by compiling data, drafting some sections, and reviewing/ editing various drafts of the plan. That spirit of collaboration and engagement ceased at the very end, negating the opportunity of Tribes to weigh in on the outlining of viable Alternatives to rebuilding the Snohomish Coho population.

Tulalip was extremely worried during the 2015 season, as in-season updates of both Snohomish and Stillaguamish coho pointed to very poor returns. The Tulalip and Stillaguamish tribes insisted on a closure of sport fisheries in the terminal waters of 8A, and both river systems. Unfortunately, the management response was not prompt enough.

Since the collapse of various natural coho populations in North Puget Sound (Snohomish, Stillaguamish, and Skagit) in 2015, Tulalip has reduced the impacts on natural coho by:

- i) Not pursuing a coho commercial fishery in terminal waters during 2016,
- ii) Having a modest terminal fisheries in 2017 with significant area/times closures in terminal area fishing grounds in 8A,
- iii) By adjusting the potential pre-season forecast error in the 2018 return (we adopted the conservative lower 95% confidence interval – effectively reducing the forecast by one half),
- iv) By implementing an early in-season closure of the terminal Treaty 8A fishery (not fishing during the second half of the season), when fisheries performance, and in-season updates to the run-size indicated potentially poorer returns than anticipated.

We reiterate our commitment to a responsible management of salmon stocks, and to work with our co-managers and with PFMC into drafting viable and meaningful alternatives to rebuild the Snohomish Natural Coho population.

Best regards,
Jason Gobin -- Fisheries Director