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Division II  
State of Washington  
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COURT OF APPEALS, DIVISION II  
OF THE STATE OF WASHINGTON

MAKAH INDIAN TRIBE,

Appellant,

v.

COMMISSIONER OF PUBLIC LANDS  
HILARY FRANZ (in her official capacity), the  
WASHINGTON STATE DEPARTMENT OF  
NATURAL RESOURCES, and the  
WASHINGTON STATE BOARD OF  
NATURAL RESOURCES,

Respondents.

No. 54945-0

AFFIDAVIT OF  
LAUREN KING

I, Lauren King, hereby declare under penalty of perjury under the laws of the State of Washington as follows:

1. I am over the age of 18, have personal knowledge as to the matters stated herein, and am competent to testify.
2. I am an attorney representing the Quileute Tribe in this subproceeding.
3. The Hoh Tribe, Quileute Tribe, and the Quinault Indian Nation (“Moving Tribes”) learned of Makah’s lawsuit against the Department of Natural Resources on June 9, 2020, through a former employee of one of the tribes.


4. After learning that Makah based its case on allegations that it had treaty rights in Moving Tribes' ceded area, the Moving Tribes prepared a motion for leave to participate as *amici* in the case.
5. I notified counsel for the parties via email on June 18 that Moving Tribes intended to seek leave of court to file an amicus brief requesting dismissal of the case.
6. The Thurston County Superior Court dismissed Makah's case following a hearing on June 19, before the Moving Tribes were able to file their motion.
7. Moving Tribes believed this case would be moot after completion of the land exchange. After learning of this Court's July 17, 2020 Ruling holding that the exchange was not moot, I emailed attorneys for the Makah Tribe and Department of Natural Resources on August 3, 2020 inquiring as to whether they would object to a motion by the Moving Tribes for leave to appear as *amici curiae* in this case to seek dismissal under Rule 19 and the Uniform Declaratory Judgments Act.
8. Responding via email on August 4, 2020, counsel for the Respondents stated they would not oppose the proposed *amicus* participation. On August 12, counsel for the Appellant stated via email that Appellant would not oppose the proposed *amicus* participation.

9. The Moving Tribes and parties continued to confer via email and reached agreement on the following proposed briefing schedule on August 13, 2020:
- August 28, 2020: Due date for Appellant’s Brief
  - September 10, 2020: Due date for Moving Tribes’ *Amicus* Brief
  - September 18, 2020: Due date for Respondents’ Brief
  - September 25, 2020: Due date for Appellant’s Reply Brief
  - September 30, 2020: Due date for Answering Briefs to *Amicus* Brief
10. In 2014 and 2015, I represented the Quileute Tribe in defense of its treaty hunting areas against “traditional use” claims submitted to WDFW by three other tribes located on the Olympic Peninsula who claimed to have “traditional use” treaty hunting rights in the same Game Management Unit (“GMU”) in which Makah claims treaty rights here—the Dickey GMU. This dispute involved five detailed expert reports discussing the application of the *Buchanan* standard to the Moving Tribes and to the three tribes claiming “traditional use” hunting rights within the Moving Tribes’ ceded area.
11. WDFW and its expert issued a detailed report describing how the Moving Tribes fully used their territory and guarded it against incursions—including attempts to hunt—by other tribes. Exhibit A is a true and correct excerpt of Dr. Gail Thompson’s January 9, 2015 report entitled *Investigation of Lower Elwha Klallam Tribe, Port Gamble S’Klallam Tribe, and Jamestown S’Klallam Tribe*

*Claim of Traditional Hunting in Portions of the WDFW Dickey  
(602) and Sol Duc (607) Game Management Units.*

12. I certify under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

EXECUTED at Seattle, Washington this 17th day of August, 2020.

By:   
Lauren J. King

## DECLARATION OF SERVICE

I, Sandra D. Lonon, declare under penalty of perjury under the laws of the State of Washington that I am now and at all times mentioned herein, a resident of the State of Washington, over the age of eighteen years, not a party to or interested in the above-entitled action, and competent to be a witness herein.

On August 17, 2020, I caused to be served in the manner noted copies of the foregoing through the Court's electronic court filing upon the designated parties below:

Wyatt F. Golding  
[wgolding@ziontchestnut.com](mailto:wgolding@ziontchestnut.com)  
Brian C. Gruber  
[bgruber@ziontchestnut.com](mailto:bgruber@ziontchestnut.com)  
Anna E. Brady  
[abrady@ziontchestnut.com](mailto:abrady@ziontchestnut.com)  
Attorneys for Appellant

Adrienne Smith  
Adrienne.smith@atg.wa.gov  
Kiry Nelsen  
Kiry.nelsen@atg.wa.gov  
[RESOLyEF@atg.wa.gov](mailto:RESOLyEF@atg.wa.gov)  
Attorneys for Respondents

Executed in Bremerton, Washington on August 17, 2020.



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Sandra D. Lonon  
Legal Practice Assistant

# **EXHIBIT A**

Investigation of Lower Elwha Klallam Tribe,  
Port Gamble S'Klallam Tribe, and Jamestown S'Klallam Tribe  
Claim of Traditional Hunting in Portions of the  
WDFW Dickey (602) and Sol Duc (607) Game Management Units

*This document is subject to ER 408*

Submitted to:  
Washington Department of Fish and Wildlife

Submitted by:  
Historical Research Associates, Inc.

Gail Thompson, PhD

Seattle, Washington  
January 9, 2015



HISTORICAL  
RESEARCH  
ASSOCIATES, INC.





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# 1. Introduction

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The Washington Department of Fish and Wildlife (WDFW) recently asked me to review evidence for S’Klallam (including the Lower Elwha Klallam Tribe, the Port Gamble S’Klallam Tribe, and the Jamestown S’Klallam Tribe) traditional hunting in portions of two WDFW Game Management Units (GMUs). They include GMU 602 Dickey—the southwestern part that lies south of Hoko River drainage and encompasses the Dickey River watershed; and GMU 607 Sol Duc—the northern part approximately above the community of Shuwah along the Soleduck River north and east to about Tom Creek).<sup>1</sup> The northern portion of the Dickey GMU (i.e., the Hoko River drainage) lies within the ceded lands of the Treaty of Point No Point (1856), which the S’Klallam Tribe and others signed. In contrast, the two GMU portions that form the subject of the present report are located in the ceded lands of Treaty of Olympia (1856), which the Quileute Tribe and others signed.

WDFW provided some documents that came from the Lower Elwha Klallam Tribe (2014) and a report from the Port Gamble and Jamestown S’Klallam Tribes (Wisniewski 2014) used to support assertions of S’Klallam hunting in various GMUs, including the 602 and 607 portions. Two other reports came from the Quileute Tribe (Powell 2014a, 2014b) and were prepared to refute S’Klallam hunting in various GMUs, including the subject portions. I reviewed these sources and readily available materials, listed in Section 3.0 below. I also read letters from the Hoh Tribe (Easton 2014a, 2014b), Makah Tribe (Greene 2014), and Quileute Tribe (King 2014a, 2014b) but found no additional material in them relevant to my review.

While Wisniewski’s report also discusses the Hoko, Quinault Ridge, and Wynoochee GMUs, and Powell’s reports discuss them plus the Pysht GMU (Powell 2014a, 2014b), these additional GMUs are beyond the scope of the review that WDFW requested of me. Therefore, I focus the present report on the southwestern portion of the Dickey GMU (the part that lies southwest of the Hoko River divide and includes the Dickey River drainage) and the northern portion of the Sol Duc GMU (the part that runs along the Sol Duc River valley between about Maxfield Prairie on the south and Tom Creek on the east).

This review examines evidence presented for S’Klallam traditional hunting use of the two GMU portions about treaty time. My review is guided by the *Buchanan* decision (*State v. Buchanan*, 138 Wn.2d 186, 978 P.2d 1070 (1999)) standard for a tribe successfully to claim that it hunted in an area

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<sup>1</sup> The contemporary spelling for the river is “Soleduck,” while the GMU is “Sol Duc.” Others have used various spellings, which appear in quotations and material cited in the present report.

outside the lands ceded by the treaty the tribe signed (see Section 2 below). This review and report do not address other topics that the Lower Elwha Klallam Tribe (2014) and the Port Gamble S’Klallam Tribe and Jamestown S’Klallam Tribe (Wisniewski 2014) say support their assertion of traditional hunting in the GMU portions. Topics not analyzed here include S’Klallam and Quileute concepts of territoriality; the seasonal distribution of elk populations; hunting in other GMUs (Hoko, Pysht, Quinault Ridge, and Wynoochee) and in lands ceded in the Treaty of Point No Point; hunting in the Olympic Mountains; hunting with blue cards; the use of trails and roads well after treaty time; and the use of deer and elk.

Earlier this year, WDFW asked me to review a report by Dr. Charles Menzies discussing Quileute and S’Klallam hunting (Menzies 2014). In my preliminary report (Thompson 2014), I disagreed with Menzies’ opinion that “the Quileute maintained an exclusive hunting area within a traditional territory that ran along the northern ridgelines of the watersheds of the Dickey and Solduc rivers” (Menzies 2014:5). My preliminary opinion suggested that the Indian Claims Commission (ICC) determination of an exclusive use area for the Quileute Tribe, which excluded the Sol Duc River watershed north of Maxfield Prairie, “might provide a better representation of exclusive use areas than the treaty ceded areas” (Thompson 2014:4). The ICC based its decision partly on its finding that the S’Klallam and others seasonally used Lake Pleasant, which is located in the Soleduck River drainage above Maxfield Prairie (Finding of Fact 13b, 7 Ind. Cl. Com. 31, December 1, 1958).

For the current review, I conducted more detailed research than for my preliminary report. I found evidence in support of S’Klallam hunting in the Elwha River drainage stretching into the Olympic Mountains and in S’Klallam ceded territory lying to the west of the Elwha River and draining into the Strait of Juan de Fuca. This area includes the northern part of the Dickey GMU. However, my more detailed review found very little evidence that the S’Klallam hunted in the Dickey River drainage (southwestern part of the Dickey GMU) and the Soleduck River drainage (northern part of Sol Duc GMU).<sup>2</sup> I have come to question the ICC’s rationale for locating the northern boundary of the Quileute Tribe’s exclusive use area below Shuwah on the Soleduck River, and I update my opinion to conclude that the materials I reviewed show almost no evidence of S’Klallam traditional hunting in the two GMU portions.

Section 2 of this report discusses the *Buchanan* decision standard for tribes asserting a treaty-reserved right to hunt in areas outside the ceded lands of the treaty they signed, as well as the types of evidence that might be used to evaluate whether tribes’ assertions meet the standard. Section 3 lists the sources I reviewed, while Section 4 discusses the arguments and evidence that the Lower Elwha Klallam and the Port Gamble/Jamestown S’Klallam Tribes have provided to demonstrate S’Klallam

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<sup>2</sup> The only potential evidence appears to be a statement in Lower Elwha Tribal member Martin Hopie’s ICC testimony, which states that Pleasant (formerly called Tyee) Lake would be in their territory; Section 4.1 below discusses the problems with this statement.

traditional hunting in the two GMU portions. Section 5 briefly summarizes ethnographic, historical, and oral history evidence for Quileute traditional knowledge and use of the Dickey and middle Soleduck River watersheds. Section 6 summarizes the evidence and provides my conclusion and Section 7 lists the references cited in the report.

## 5. Evidence for Quileute Use of Dickey and Soleduck River Watersheds

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Ethnographic and Quileute Tribal oral history sources provide abundant evidence of Quileute traditional knowledge and use of the Dickey and Soleduck River drainages, as discussed briefly in the following sections. This is the kind of evidence I would expect to see if the S’Klallam were hunting in the two GMU portions, but which is lacking in the materials I reviewed.

### 5.1 Ethnographic Information

Ethnographic information about Quileute occupation of the Dickey and Soleduck drainages comes from Reagan (ca.1907), Frachtenberg (1916), and Swindell (1942). In 1907, the Smithsonian Institution Bureau of American Ethnology received a manuscript from Albert B. Reagan, who was a school teacher at La Push in the early 1900s with a great interest in Quileute and Hoh ethnology, including aspects of their language, legends, religion, social customs, and archaeological sites. In his manuscript, Reagan listed 20 village communities with the names of their “last chief,” in addition to the village at Quileute (La Push) and a fortress at James Island (“A-kah-lot”). On the Soleduck River, Reagan listed village No. 13 as “the spring place” at Shuwah, and No. 14, located above Shuwah, was “the place where they dig fern roots to make flour: at Beaver [*šic*, probably “Beaver”] Prairie. On the Dickey River was No. 15, a village without a translated name (Reagan ca.1907:1.5–2).

Anthropologist Leo J. Frachtenberg (1916) worked with several Quileute Tribal members to make extensive, detailed ethnographic notes resulting in a manuscript, later typewritten, with some portions archived in the Smithsonian Institution and most in the American Philosophical Society. He recorded and sketch-mapped Quileute names, locations, and owners that his informant Arthur Howeattle gave for 16 fishing places along the rivers. These included:

- No. 8, at Shuwah on the Soleduck River, “‘water boils, turbulent’; belongs to wife of Morgenroth.”
- No. 9, on the Dickey River, somewhat more than halfway from the mouth to the forks, “belonged to Webb Jones . . . ‘small fish-trap.’”
- No. 16, located between the mouth of the Dickey and No. 9, “‘he had feathers on top’ . . . to Ward family (the rock had grass on top; hence this name).” (Frachtenberg 1916:2:6–2:9)

The text went on to say that “[h]unting grounds were communal property. These grounds were on the upper part of each river and reached clear to the Olympic Mountains” (Frachtenberg 1916:2:9). The sketch map shows hunting grounds running east of the Soleduck and other rivers in Quileute territory.

Edward G. Swindell gathered affidavits from two Quileute Indians about fishing practices for a 1942 investigation of treaty rights. In his affidavit, Sextas [Sixtis] Ward, who was about 90 years old, described the Quileute village at Shuwah and said that “Shu-a-wah was a permanent village of about 20 people or more, with three smoke houses; that it was located just a little bit below the junction of a creek that comes from Lake Pleasant and the Sol Duc River” (Swindell 1942:220). Ward also said there had been a permanent village at the mouth of the Dickey River and that “the Indians who used to live at this village, as well as others from La Push and other Quileute villages, used to go up to the area around Dickey Lake for the purpose of hunting elk” (Swindell 1942:220–221).

## 5.2 Quileute Tribe’s Place Names for the GMU Portions

Information on Quileute traditional knowledge and use of the Dickey and Soleduck watersheds contrasts sharply with that available for the S’Klallam and reflects extensive Quileute use, including hunting, of the two GMU portions.

Dr. Jay Powell, who has learned linguistic and anthropological information with Quileute tribal members for many years, prepared portions of the Cultural Resources module for the Washington State Department of Natural Resources Sol Duc Pilot Watershed Analysis (Powell 1995), including a list of 71 Quileute cultural places. Similarly, writing in four monthly issues of the Quileute newsletter, *The Talking Raven*, in 2012–2013, Powell provided information on Quileute knowledge and use of the Dickey River watershed (Powell 2012a, 2012b, 2012c, 2012–2013). These works extensively describe the tribal names, characteristics, uses, and histories of places in the two watersheds.

The following paragraphs discuss selected Dickey and Sol Duc watershed places. This discussion focuses on settlements, trails, hunting activities, and stories; less attention is given to places and activities associated only with fishing, root digging, and gathering activities. Table 1 lists places for the Dickey watershed, all of which is located in GMU 602. Table 2 provides the same information for the portion of the Sol Duc watershed located in GMU 607. Information in the tables includes locations, places names in English (if available), Quileute knowledge about the places, and citation to Powell’s works. While Powell gave no location numbers for the Dickey watershed, he did for the Soleduck and those are included in Table 2.

Table 1. Selected Quileute Tribe's Dickey River Places (based on Powell 2012a, 2012b, 2012c, 2012–2013).

Name/Location*	Information	Reference
Dickey River watershed	Fishing and hunting grounds of Sixtis Ward's father; the son kept hunting and fishing lodges there and passed rights to his children; he permitted two hunting partners to use the watershed.	Powell 2012a:6
Low wetlands west of the river, "mosquito's home"	Considered a home site of the "kelp-haired cannibal woman," associated with a story of how she was killed and her ashes turned into mosquitos, and how they respond to the East Wind and the West Wind.	Powell 2012a:7
1.6 mi south of Coal Creek confluence, village called "the little bunch or little group"; also "the little fish trap"	Settlement with one house; good place for beaver.	Powell 2012a:7
Area between Dickey River and ocean	Accessed via trail, shown in following Table 1 entry; closer and easier place to hunt elk than going upriver.	Powell 2012b:6
Upper reaches of Coal Creek ("going-towards-the-sea creek") to ocean	Trail to the ocean.	Powell 2012b:6
Mouth of Coal Creek	Permanent village; abandoned by 1885.	Powell 2012b:6
Mouth of Colby Creek, running in between the (the two [Quillayute and Little] prairies)"	Historical hunting settlement belonging to Ward family.	Powell 2012b:7
Along Dickey River from mouth of Colby Creek to junction of East and West Dickey Forks and beyond	Hunting camps	Powell 2012b:7
Confluence of East and West Dickey River Forks "the back and forth junction" (because of zigzags)	Quileutes apparently hunted above the confluence, based on knowledge of the area, place names, and the existence of mythic stories.	Powell 2012b:7
<b>East Fork Dickey River, "coiled up river"</b>		
First turn of East Fork Dickey River	Fred Woodruff and Sara Ward Woodruff's historical hunting cabin.	Powell 2012b:7



Table 1. Selected Quileute Tribe's Dickey River Places (based on Powell 2012a, 2012b, 2012c, 2012–2013).

Name/Location*	Information	Reference
About ¾ mi above confluence of East and West Forks	Trail from East Fork to Wentworth Lake, where Quileutes picked wild crabapples and cranberries.	Powell 2012c:6
Thunder Creek, “dammed up or held back water.” Thunder Lake	Name may have referred to beaver dams; one Quileute thought Thunder Lake may have been the original home of the mythic Beaver.	Powell 2012c:6
Area of East Dickey River around the mouths of Thunder and Gunderson Creeks	Called “two rivers”	Powell 2012c:7
Gunderson Mountain	Called “the watchman” or “babysitter”	Powell 2012c:7
Trail from Dickey River up West Gunderson Creek across a wet area to Shuwah, 1.5 mi east	People from Shuwah and Dickey used the trail for visiting and hunting. Loggers later built a railroad that followed the trail.	Powell 2012c:7
Upper East Fork Dickey River area, especially on Gunderson Creek	When wet weather caused ponding, hunters used dogs to chase elk into the water and then killed them from small river canoes.	Powell 2012c:7
Skunk Creek	An area the old people called “upstream spirits,” connected with spiritual bathing rituals men used to improve their hunting success.	Powell 2012c:7
Bear Creek, which starts on the Dickey-Hoko summit and flows into the Dickey	Said to be a favorite place to hunt bear. One man remembered several deep holes along East Dickey on both sides of the Skunk Creek confluence that were probably old bear pit-falls.	Powell 2012c:7
<b>West Fork Dickey River</b>		
50 yards up West Fork Dickey River	Daniel White & Sixtis Ward hunting cabins.	Powell 2012b:7
Trail along bank of West Fork from Dickey Lake to confluence	Used for family members to walk when canoes coming downriver were full of dried elk, fish, berry cakes, root foods, medicines, weaving materials, and gear for hunting, fishing, and camping.	Powell 2012–2013:6
Outlet from Wentworth Lake, “cat’s cradle”	A very winding stream.	Powell 2012–2013:6

Table 1. Selected Quileute Tribe's Dickey River Places (based on Powell 2012a, 2012b, 2012c, 2012–2013).

Name/Location*	Information	Reference
Unnamed tributary entering the Dickey from the west, just downriver from Squaw Creek	Trail led to Siwash Creek and along it downstream to the southwest corner of Lake Ozette.	Powell 2012–2013:7
Squaw Creek, “frog-pond creek”	Associated with a story about Big Joe’s Lake in which a man obtained the spirit power of the frog, which helped him fish very successfully for blueback salmon until he actually became a frog “as big as a bear,” living in the lake.	Powell 2012–2013:6–7
“The Big Mud,” “a set of wetland marshes and sloughs along the upper West Dickey”	A place to obtain grasses, reeds, and rushes used in traditional domestic crafts such as basketry; men made canoes from big cedars that grew in the area.	Powell 2012–2013:7
Dickey Lake, “the lake” or “the little lake”	“Rich in fish, . . . loaded with elk in late fall when they were nice and fat, . . . a good place to gather berries and other seasonal foodstuffs, medicines and weaving materials.”	Powell 2012–2013:7
North end of Dickey Lake, perhaps near mouth of Stampede Creek	Settlement used as a hunting camp; “sunny and open for drying meat.”	Powell 2012–2013:7

\*Only English translations of place names are provided here.

Table 2. Selected Quileute Tribe's Soleduck River Places (from Shuwah running upstream to about Tom Creek; based on Powell 1995).

No.	Name/Location*	Information	Pages
53	Shuwah, also called "turbulent water place"	Permanent village on west side of river; about 3 houses and 20 people; birthplace of Sixtis Ward; location inherited by Susie Morgenroth, who was owner in 1916.	2.1-7
52	Mouth of Lake Creek	Permanent village of about 20 people located on the river south of the mouth of Lake Creek	2.1-7
51	Lake Creek, "little trail creek"	Named for a branch of the main trail along the river that ran along the creek to Lake Pleasant.	2.1-7
50	Ridge and stones made by Thunderbird, "whale rock"	"Oval ridge of rocks is the transformed carcass of a great whale carried there by Thunderbird, and the large stones scattered around it (and along the river) are the transformed remains of early Quileutes who were cutting up the whale and were killed by fist-sized hailstones sent by the T-bird, who was angry that they were stealing his kill. . . ."	2.1-7
49	Soleduck Valley including Tyee Prairie and Beaver Prairie, "hot place"	"This prairie area (and possibly all of the prairies in Quileute country) was caused by Thunderbird pausing to rest in carrying whales back to his lair, and the thrashing of the whale in attempting to escape back to the sea knocked over the trees and caused the open areas. . . ."	2.1-7
48	Lake Pleasant	"Probably the location of the prized sockeyes, called 'bluebacks' by the Quileutes."	2.1-7
47	Curves in the Sol Duc at mile 27	Curves called animal names, "from downriver to upriver, the righthand curves are named for land animals and the lefthand curves for water animals."	2.1-7
46	Village site at the mouth of Bockman Creek, "the place where canoes get carried out of the woods"	"This was the furthest upstream of the Quileute villages on the Sol Duc. Approximately 15 people are estimated to have lived here in one "smokehouse", a term used for the shed-roofed Quileute longhouses. . . . This was a preferred place to make canoes, cutting big cedars in the hills to the south of the village site and floating the roughed out canoe down Bockman Creek (called. . . 'canoe-making feast creek') to the Sol Duc. . . ."	2.1-7

Table 2. Selected Quileute Tribe's Soleduck River Places (from Shuwah running upstream to about Tom Creek; based on Powell 1995).

No.	Name/Location*	Information	Pages
45 & 45a	Beaver Creek, "many cattails"	"Up Beaver Creek was a good place to get cattails. There were a lot of other, closer places for the women to get mat-materials, but they are remembered as particularly luxuriant up on the Beaver swamp. . . . The falls on Beaver Creek . . . were an impediment to fish runs. A trail ran from the falls to the lake and there was a canoe at the foot of the lake for anyone's use."	2.1-7
44	Mouth of Bear Creek, "high up prairie area"	"The Old People hunted in the Bear Creek area."	2.1-6
43	Bear Creek, "muddywater creek"	Later called "Bear Creek" in Quileute, perhaps referring to the tradition that at the "time of beginnings," the legendary figure Bear lived along the creek.	2.1-6; (also, see, Powell 2012c:7)
42	The S-curve at river mile 40, "looping spins"	May also have been called "loops place."	2.1-6
41	Below Snider Creek, "in between"	A 9-mile stretch of the river lacking particular features between Bear Creek and Snider Creek.	2.1-6
40	Snider Creek, "halfway creek"	This constituted the halfway point for people who canoed from Shuwah to Sol Duc hot springs in one day.	2.1-6
39	The big bend in the river, "turn-around-and-go-back place"	[No other information provided]	2.1-6
38	Camp Creek, "tumpline"	At the mouth had been a tree that was bent over like a tumpline.	2.1-6
37	"Trail along the river" from the hot spring down to the lower Sol Duc	Some or all was located on the north side of the river.	2.1-6
36	Zigzag turns, "sharp switchback turns in the river"	Named for characteristic of the river.	2.1-6
35	Goodman Creek, "somersault end over end"	"Section of the river with great looping turns."	2.1-6

Table 2. Selected Quileute Tribe's Soleduck River Places (from Shuwah running upstream to about Tom Creek; based on Powell 1995).

No.	Name/Location*	Information	Pages
34	South Fork of the Sol Duc	"Tom Creek was called . . . 'held back water' (the term that is also used for a beaver dam)."	2.1–6
33	North Fork of Sol Duc, possibly "rabbit's river"	"'Rabbit' killed Northeast Wind (who lived up the North Fork at the base of Mt. Appleton . . .), because the wind froze people for fun and also stole people's fish. Rabbit's home was somewhere on the lowlands at the junction of the North Fork with the Sol Duc."	2.1–6
32	Confluence of North Fork and South Fork, forming the Sol Duc main river, "three rivers"	Name "previously used by the old people for this confluence."	2.1–5–6
31A	Two identical islands in the river, "twins"	Said to have resulted "from transformed twins, according to Quileute narrative."	2.1–5
31	Rapids on the upper Sol Duc, "roaring riddle"	The summer coho run spawn above these rapids, around which canoes portaged.	2.1–5
30	Mt. Muller, "pitcher mountain"	"Still shows that big chunk out of the top where the rock in the story (#29) was ripped from."	2.1–5
29	Lake Crescent, "half-moon lake"	On the other side of the border ridge (#28); "site of mythic battleground between the Elwhas and the Quileutes in the valley where the lake now stands. This bloody battle went on for two days and finally Mount Muller (according to some, or Stormking Mt., according to others) exasperated with the confusion, took a great hunk of rock from his head and threw it down into the valley, killing all the combatants. This rock dammed the stream in the valley and caused the lake."	2.1–5
28	"Border Place," ridgeline along the north side of the Sol Duc North Fork, with Aurora Peak and Sourdough Mountain	"Regularly thought to be the northern limit of traditional Quileute country."	2.1–5
27	"Ayahus' Nest," up Alcee Creek	Location where "the bird who changed into a person, nested."	2.1–5
26	Alcee Creek, "almost being there"	Reaching this creek, travelers to Sol Duc hot springs saw that they would arrive soon.	2.1–5

\*Only English translations of place names are used.

The tables provide abundant information about Quileute use in the watersheds that address the criteria suggested in Section 2 above for the *Buchanan* standard. Quileute individuals and groups made traditional use of the watersheds that appears to date from pre-treaty times. Use included not only settlements and hunting but also fishing, gathering, story-telling, and spiritual practices. Hunting appears to have been seasonal and included pursuit of elk, deer, and bear as well as drying meat. People accessed places in the watersheds with canoes and via trails. In addition to Quileute place names for places throughout each watershed, there are many legendary Quileute stories set in those locations.

Information on Quileute traditional hunting use of the Soleduck watershed also stretches upriver from the eastern border of GMU 607. Families, groups of hunters, and individuals camped (place No. 18) around Sol Duc Hot Springs (place No. 17) from late summer through late fall to hunt elk and dry the meat on racks, pick and dry seasonal berries, and bathe in the hot springs (Powell 1995:2.1–4). Other places included No. 19, where hunters sometimes camped, and No. 21, an easily accessible location on the river from which “groups of hunters with dogs would go upstream, driving elk downriver by howling like wolves and shouting.” Another group of hunters “would be waiting for the elks here in the hunting place. . .” (Powell 1995:2.1–4). No. 22 was a chase trail, with “precipitous narrow places along [it] where hunters installed bark slip-sheets to cause the game to slide off the trail into the riverbed where they could be approached while stunned or injured. . .” (Powell 1995:2.1–4). No. 23 was a “no trails” area north of the river, “the Quileute equivalent of No Man’s Land” (Powell 1995:2.1–5).

Other places to the north and east of the GMU 607 represented the boundaries between Quileute and S’Klallam territory, where fights had taken place in legendary times. No. 13, Boulder Peak, “was thought of as the border between Elwha and Quileute country” (Powell 1995:2.1–3, 2.1–4). No. 28, the ridgeline north of the North Fork of the Soleduck River that includes Aurora Peak and Sourdough Mountain, “was regularly thought to be the northern limit of traditional Quileute country” (Powell 1995:2.1–5).

No. 29, Lake Crescent, “was the site of a mythic battleground between the Elwhas and the Quileutes in the valley where the lake now stands” (Powell 1995:2.1–5). No. 14, “fighting-ground of the monsters,” was at the boundary between Elwha and Quileute territory where two monsters occasionally battled, destroying a large area, and wounding each other seriously, after which each returned to his cave and cried. The hot tears created the Sol Duc and Olympic hot springs. No. 15, the location of which was uncertain, represented the “lair of the monster who cries in the woods” (Powell 1995:2.1–4).

Details on Quileute traditional knowledge and use of the Dickey and Soleduck watersheds contrasts sharply with the lack of such information for the S’Klallam and reflects extensive Quileute use of the two GMU portions as well as other locations upriver in the Soleduck watershed.

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