

QUINAULT INDIAN NATION RESERVATION HISTORY

Prepared for

Environmental and Natural Resources Division
U.S. Department of Justice

by

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Contemporary Statistics of the Reservation

Total Trust Acreage, 2004	184,404.49 ¹
Tribal Trust Acreage, 2004	67,654.12 ²
Allotted Trust Acreage, 2004	116,750.37 ³
Current Tribal Enrollment, 2001	2,454 ⁴

¹Veronica E. Valarde Tiller, ed. & comp., *Tiller's Guide to Indian Country: Economic Profiles of American Indian Reservations* (Albuquerque: BowArrow Publishing Co., 2005), p. 997.

²Tiller, *Tiller's Guide to Indian Country*, p. 997.

³Tiller, *Tiller's Guide to Indian Country*, p. 997.

⁴. Tiller, *Tiller's Guide to Indian Country*, p. 997.

Map of {STATE}

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Administrative History

The Quinault Reservation, which was commonly spelled Quinaielt through the mid-20th century, was originally under the general jurisdiction of the Washington (Territory) Superintendency of the Office of Indian Affairs (OIA). The OIA, which did not officially become the Bureau of Indian Affairs (BIA) until 1947,⁶ created the Quinault Subagency in 1861 to supervise the Indians residing on the reservation. The Quinault Subagency became a special agency in 1874, and in 1878 the OIA raised the office's status to full agency. The agent at Quinault first reported to the Washington Superintendent in Olympia, and after the OIA eliminated this superintendency in 1874, the Quinault agent reported directly to the OIA headquarters in Washington, DC.⁷ In 1888, the OIA merged the Quinault Agency and the Nisqually and Skokomish Agency to form the Puyallup Consolidated Agency. In 1910, the name of the Puyallup Agency was

⁵ BIA, "Tribal Leaders Directory, Fall 2012," Regional Directors, BIA Representatives: Northwest Region, and Tribal Leaders: Northwest Region."

⁶ Francis Paul Prucha, *The Great Father: The United States Government and the American Indians*, Vol. II of II (Lincoln: University of Nebraska Press, 1984), p. 1229 [MA-681].

⁷ Edward E. Hill, *The Office of Indian Affairs, 1824-1880: Historical Sketches* (New York: Clearwater Publishing, 1974), pp. 193, 196.

changed to the Cushman Agency, and in 1914 the OIA created the Taholah Agency to administer the Quinault Reservation exclusively. The Taholah Agency took its name from a town within the reservation's boundaries. Over the next few decades, the OIA assigned additional groups of Indians to the Taholah Agency following the abolishment of other agencies. A number of these Indians relocated to the Quinault Reservation. In 1950, the BIA established the Western Washington Agency from the merger of the Taholah Agency and the Tulalip Agency.⁸

When the BIA established its network of Area Offices in 1949, the Portland Area Office was created in Portland, Oregon to oversee the operations of the Western Washington Agency and other agencies in the region.⁹ During fiscal year 1979, the BIA abolished the Western Washington Agency and divided the reservations under its jurisdiction between two new agencies, the Olympic Peninsula Agency, which included the Quinault Reservation, and the Puget Sound Agency.¹⁰ Between 1998 and the end of 2001, the BIA established the Taholah Field Office to administer the affairs of the Indians living on the Quinault Reservation.¹¹ In the early 2000s, the BIA renamed the Portland Area Office the Northwest Regional Office.¹² By 2012, the Taholah Field Office had become the Taholah Agency.¹³

For easy reference, the chart below lists the OIA/BIA agencies that have been responsible for the Quinault reservation since the mid-nineteenth century:

⁸ Edward E. Hill, *Guide to Records in the National Archives of the United States Relating to American Indians* (Washington, DC: National Archives and Records Administration, 1981), pp. 178, 186.

⁹ Prucha, *The Great Father*, vol. II, p. 1038 [MA-681].

¹⁰ BIA, *Annual Report of Indian Land and Income from Surface and Subsurface Lease, September 30, 1978*, pp. 91-92, BIA Realty Office [MA-5399]; and BIA, *Annual Report of Indian Land and Income from Surface and Subsurface Lease, September 30, 1979*, pp. 32-33, BIA Realty Office [MA-5550].

¹¹ Olympic Peninsula Agency, *Annual Report of Caseloads, Acreages Under BIA and Surface Leasing for Calendar Year 1998, Quinault Reservation, Form 5-5425* [0311ALX0015670]; Taholah Field Office, *Annual Report of Caseloads, Acreages Under BIA and Surface Leasing for Calendar Year 2001, Quinault Reservation, Form 5-5425* [0311ALX0013860].

¹² Portland Area Office, *Annual Report of Caseloads, Acreages Under BIA and Surface Leasing for Calendar Year 2001, Consolidated Report, Form 5-5425* [0311ALX0014421]; and Northwest Regional Office, internal memorandum, 2/20/2002 [0311ALX0014580].

¹³ BIA, *Tribal Leaders Directory, Fall 2102, BIA Representatives: Northwest Region*.

<u>Responsible Indian Agency</u>	<u>Period</u>
Quinault Subagency/Special Agency/Agency	1861-1988
Puyallup Consolidated Agency	1888-1910
Cushman Agency	1910-1914
Taholah Agency	1914-1950
Western Washington Agency	1950-1979
Olympic Peninsula Agency	1979-Circa 2000
Taholah Field Office/Agency	Circa 2000-Present

Key Treaties and Legislation

A treaty of July 1, 1855 and January 25, 1856 with the Quinaielt and Quillehute Indians provided for the cession to the United States of tribal lands in northwestern Washington Territory in exchange for a payment of \$25,000. The President was directed to select reservations for these tribes.¹⁴

An Executive Order of November 4, 1873 reserved certain lands for the Quinaielt, Quillehute, and other tribes in Washington.¹⁵

Section 10 of the Act of June 25, 1910 authorized the Secretary of the Interior (Secretary) to issue restricted patents to village or town lots within Indian reservations in Washington, including the Quinaielt reserve, to tribal members occupying those lots.¹⁶

An Act of March 4, 1911 directed the Secretary to provide land allotments on the Quinaielt Reservation to members of the Hoh, Quileute, Ozette, and other affiliated tribes in Washington who desired to settle on that reserve rather than the reservations established for them. These allotments were to be made on those surplus reservation lands that remained after the Quinaielt Indians were allotted lands in severalty.¹⁷

An Act of August 22, 1914 authorized the Secretary to set side up to 206.75 acres near Cape Elizabeth on the Quinaielt Reservation for the establishment of a lighthouse by the U.S.

¹⁴ Treaty of January 25, 1856, 12 Stat. 971, in Charles J. Kappler, comp. & ed., *Indian Affairs: Laws and Treaties*, Vol. II of VI (Washington: GPO, 1904), p. 719 (hereafter cited by volume and page number, such as II Kappler 719).

¹⁵ Executive Order of November 4, 1873, I Kappler 928.

¹⁶ 36 Stat. 858, III Kappler 478.

¹⁷ 36 Stat. 1345-1346, c. 246, II Kappler 507.

Lighthouse Service. The statute provided that the Indians of the reservation would retain ownership rights in common to any subsurface minerals on these lands.¹⁸

An Act of February 12, 1925 authorized the Quinaielt Tribe and other tribes and bands in Washington to present claims to the U.S. Court of Claims related to certain treaties of the 1850s, including the Quinaielt treaty of 1855-1856. The statute provided that the claims must be filed within five years and that any party in the claims had the right of appeal to the U.S. Supreme Court. It also established a limit on attorney fees.¹⁹

An Executive Order of December 30, 1931 extended the period of Federal trust on the lands of the Quinaielt Reservation for ten years (to 1941).²⁰

An Act of May 28, 1934 authorized the Secretary to issue patents to not more than two lots within the village of Taholah on the Quinaielt Reservation to qualified Indians who were residents of that village. The statute provided that those tribal members who had already received a patent for one lot under provisions of Section 10 of the Act of June 25, 1910 were entitled to receive a patent for one additional lot.²¹

An Act of June 6, 1934 authorized the Secretary to modify timber sale contracts on the Quinaielt Reservation under certain conditions, but only with the consent of the Indians involved, as expressed through a general council.²²

The Act of June 18, 1934, also known as the Indian Reorganization Act (IRA), provided that Indians could organize “for their common welfare” and adopt tribal constitutions under rules prescribed by the Secretary. The statute also provided that the Secretary might provide charters of incorporation to such tribal organizations, which would become effective if ratified by a majority of the organization’s adult members. In addition, the law prohibited further allotments and extended the trust period on Indian lands indefinitely.²³ The Quinault Tribe voted to accept the IRA but did not reorganize its tribal government under its provisions, preferring instead to be governed by bylaws it adopted in 1922.²⁴

¹⁸ 38 Stat. 704, c. 269, IV Kappler 36.

¹⁹ 43 Stat. 886-887, c. 214, IV Kappler 477.

²⁰ Executive Order 5768, December 30, 1931, V Kappler 642.

²¹ 48 Stat. 811, c. 364, V Kappler 369.

²² 48 Stat. 910, c. 407, V Kappler 370.

²³ 48 Stat. 984, V Kappler 378.

²⁴ Robert H. Ruby, John A. Brown, and Cary C. Collins, *A Guide to the Indian Tribes of the Pacific Northwest* (Norman: University of Oklahoma Press, 2010), p. 252.

An Act of March 9, 1940 authorized the Secretary to pay the fees of legal counsel that represented those Quinaielt Indians who received land allotments on the Quinaielt Reservation as a result of court judgments. This appropriation was to be reimbursed from the trust funds of the allottees that represented the sale of land allotments or timber on the reservation.²⁵

An Act of July 24, 1947 amended an Act of February 12, 1925 that authorized the Quinaielt Tribe to present claims to the U.S. Court of Claims related to the 1855-1856 treaty. The statute declared that the Quinaielt Tribe was the “proper party plaintiff” representing all tribal members having rights on the Quinaielt Reservation in the pending suit before the Court numbered L-23.²⁶

An Act of August 25, 1959 provided that the 15.3 acres of land purchased by the United States for school purposes at Queets Village on the Quinault Reservation would be conveyed to individual tribal members occupying lots within that property, to be held in trust. The statute provided that all remaining lands within the property would be reserved in trust for the Quinault Tribe.²⁷

An Act of October 15, 1962 provided that approximately 85 acres of the 206.75 acres set aside in 1914 for lighthouse purposes near Cape Elizabeth on the Quinaielt Reservation would be reserved in trust for the Quinault Tribe.²⁸

A Secretarial Notice of August 30, 1969 accepted the retrocession to the United States of all jurisdiction previously exercised by the State of Washington over the Quinault Reservation.²⁹

An Act of November 8, 1988 transferred approximately 11,905 acres of the Olympic National Forest to the Quinault Reservation in settlement of the long-standing northern boundary dispute (see below). The law also provided that the Quinault Indian Nation would share a percentage of the timber sale proceeds from an additional 5,460-acre section of the Forest.³⁰

An Act of March 4, 2004 approved a plan for the distribution of approximately \$1.2 million to the Quinault Nation as part of the judgment award of the *Helen Mitchell* timber

²⁵ 54 Stat. 48, c. 49, VI Kappler 47.

²⁶ 61 Stat. 135-36, c. 311, VI Kappler 342.

²⁷ 73 Stat. 427, VI Kappler 885.

²⁸ 76 Stat. 913, VI Kappler 985.

²⁹ Secretarial Notice of August 30, 1969, VII Kappler 1576.

³⁰ 102 Stat. 3327.

settlement (see below). The law specified that the appropriation was to be used by the Nation to establish and manage a Permanent Fisheries Fund to finance specific enhancement projects.³¹

Reservation Origins and Land Tenure History

The modern Quinault tribal entity consists of the descendants of seven tribal groups: Quinault, Quileute, Chinook, Hoh, Chehalis, Queets, and Cowlitz. The common bond of these affiliated groups historically was their residency in the coastal and inland areas of what became the state of Washington and their dependence on the region's abundant fisheries for subsistence.³² The Quinault Reservation, initially set aside by the Executive Order of November 4, 1873, occupies a triangular wedge of land in Grays Harbor and Jefferson counties, Washington. The Olympic National Forest and Lake Quinault form its eastern boundary, the Pacific Ocean its western, and the Queets River its northern. The Quinault River, which flows across the reservation, delineates the reserve's southern border.³³ After the northern and southern boundaries were retraced in 1902, the gross area of the reservation (including water) was determined to be approximately 196,645 acres. In 1941, the OIA reported that the total land area was about 189,621 acres, of which approximately 175,159 was still held in Federal trust. Of this net area, the Quinault Tribe owned about 5,748 acres in 1941.³⁴

Most of the Quinault Reservation was allotted in severalty to individual tribal members, primarily in 1916, 1923, 1928 and 1933.³⁵ In 1931, the U.S. Supreme Court ruled that members of the Chehalis, Chinook, Cowlitz, and other tribes for which land had not previously been reserved were entitled to allotments

³¹ 118 Stat. 542, § 301.

³² James W. Powell, "Quileute" in William C. Sturdevant, gen. ed., *Handbook of North American Indians*, Volume 15, *Northwest Coast*, edited by Wayne Suttles (Washington: Smithsonian Institution, 1990), pp. 431-32, 437; Yvonne Hajda, "Southwestern Coast Salish," in *Handbook of North American Indians*, Volume 15, *Northwest Coast*, pp. 503-507, 516; Michael Silverstein, "Chinookans of the Lower Columbia," *Handbook of North American Indians*, Volume 15, *Northwest Coast*, pp. 533-34, 536.

³³ BIA, Western Washington Indian Agency, *Population Support Capacity Study, Quinault Indian Reservation, State of Washington*, February 1968,

³⁴ OIA, Taholah Indian Agency, *Ten-Year Planning Program by the Quinault Indians of the Quinault Reservation, Washington, March 1944*, p.2.

³⁵ **NEEDS CITE.**

on the Quinault Reservation under provisions of the 1911 statute that permitted members of the Hoh, Quileute, Ozette, and other tribes to also receive allotments on Quinault.³⁶

In 1959, the BIA reported that 187,200 acres had been allotted, of which 161,520 was still in trust status. The Quinault Tribe then held approximately 3,587 acres of trust land. The BIA reported additionally that the majority of the Tribe's members supported themselves through fishing or employment in fish processing plants or timber operations.³⁷

In 1978 the Quinault Tribe secured a \$1 million loan from the Federal Housing Administration (FHA) for the purpose of land acquisition. By 1987, the Tribe managed to more than double the amount of acreage under tribal ownership. In 1988, the Tribe purchased an additional 9,985 acres from the Federal Land Bank of Spokane. In an effort to facilitate negotiations for this land, the tribe formed the Quinault Land and Timber Enterprise (QLTE).³⁸ In that same year, Congress added approximately 11,905 acres of land within the Olympic National Forest land to the trust land base of the Nation in a final settlement of the Quinault Reservation northern boundary dispute, which had previously been addressed by the U.S. Court of Claims in the 1940s and 1950s. In addition, this legislation authorized the Secretary of Agriculture to distribute 45 percent of the timber sale proceeds from an additional 5,460 acres of Forest Service land southeast of the Reservation, which became known as the Quinault Special Management Area. This provision was made to allow compensation for those lands in the northern boundary dispute area that could not be returned to the reservation because of their ownership by the National Park Service, the State of Washington, and private citizens. The tribal share of the proceeds was to be used to cover the administrative costs of forest management and for mitigation of environmental impacts, reforestation, and land acquisition.³⁹

³⁶ U.S. Supreme Court, *Hillary Halbert, Jr., et al., v. United States*, Decision, 6/1/1931, 283 U.S. 753, 1931 LEXUS 176, image pp. 3, 5-6.

³⁷ U.S. Senate, Committee on Interior and Insular Affairs, *Indian Heirship Land Survey of the Eighty-Sixth Congress, First Session: Part 1*, 86th Cong., 2nd sess., Committee Print, 12/1/1960, pp. 580, 587, 847.

³⁸ Jacqueline M. Storm with David Chance, et al., *Land of the Quinault* (Taholah, WA: Quinault Indian Nation, 1990), pp. 178-80.

³⁹ 102 Stat. 3327; Storm, et al., *Land of the Quinault*, pp. 179-80..

Natural Resource Development

The primary natural resource on the Quinault Reservation is timber, which has provided major revenue to both the Tribe and its individual members for many years. Some revenue has also been generated by sand and gravel production and, to a lesser extent, by oil and gas leases.

I In 1959, the BIA reported that 66,390 acres of the reservation's forestlands were under lease to non-Indian operators. In addition, about 1,255 acres were leased to several non-Indians for the extraction of sand and gravel for road maintenance, which generated significant revenue. Approximately 4,145 acres were also under oil and gas leases, although paying quantities of petroleum had not been found.⁴⁰

⁴⁰ *Indian Heirship Land Survey of the Eighty-Sixth Congress, First Session: Part 1* (1960) p. 582, 588.

Judgment and Settlement Funds

The U.S. Court of Claims found in a 1945 decision in the case of *The Quinaielt Tribe of Indians v. The United States* that an 1892 survey of the northern boundary of the Quinault Reservation erroneously excluded a significant portion of land.⁴¹ In further proceedings of this case, the Court determined in 1951 that the exclusion consisted of 15,928.27 acres valued at \$87,988.68. However, on the basis of a General Accounting Office (GAO) report, the Court found that the Government had expended \$87,995.62 for non-treaty benefits to the plaintiffs.⁴² Although the allowed offset meant that the Quinault Tribe was not able to recover damages, it continued to pursue a final settlement of the northern boundary issue, which resulted in the 198X legislation described above.

The Indian Claims Commission awarded the Quinault Tribe \$205,172 in 1963 as additional compensation for lands ceded to the United States by the Treaty of 1855-56 (Treaty of Olympia).⁴³ A 1965 law left the use of these funds to the discretion of the tribal government, with the approval of the Secretary of the Interior.⁴⁴ The members of the Quinault Tribe subsequently voted to apply their share of the award to tribal community projects.⁴⁵

In 1971, the Quinault Tribe, the Quinault Allottees Association, and several individual tribal members filed four suits with the United States Court of Claims (Dockets 771-71, 773-71, 774-71, and 775-71). This litigation, which would ultimately lead to a landmark decision by the United States Supreme Court, alleged that the Federal Government was liable for a breach of trust as a result of its mismanagement of the Reservation's timber resources. The specific allegations included:

- (1) Failure to obtain fair market value for the allottees timber when it was sold either under multiple allotment, long term contracts, individual allotment contracts, or land and timber sales;

⁴¹ U.S. Court of Claims, *The Quinaielt Tribe of Indians v. The United States*, Opinion, 2/5/1945, 102 Ct. Cl. 822, 1945 U.S. Ct. Cl. LEXIS 98, image pp. 1-3, 5-7.

⁴² U.S. Court of Claims, *The Quinaielt Tribe of Indians v. The United States*, Opinion, 1/9/1951, 118 Ct. Cl. 220, 1951 U.S. Ct. Cl. LEXIS 12, image pp. 1, 8-9.

⁴³ U.S. Indian Claims Commission (hereinafter ICC), *Quinaielt Tribe of Indians, et al., v. United States*, Docket No. 242, Findings of Fact, in the Matter of the Joint Motion of the Petitioner and Defendant in the Above Titled Docket No. 242 for the Approval of a Proposed Compromise Settlement, 12/21/1966, 10 Ind. Cl. Comm. 411

<http://digital.library.okstate.edu/icc/v10/icc10p411.pdf>.

⁴⁴ 79 Stat. 11847].

⁴⁵Ruby, Brown, and Collins, *A Guide to the Indian Tribes of the Pacific Northwest*, p. 253.

- (2) Failure to manage the timber sales and harvesting on the Reservation on a sustained yield basis and failure to rehabilitate the land after logging;
- (3) Failure to obtain any payment at all for some of the allottee's merchantable timber;
- (4) Failure to develop a proper road and easement system on the Reservation and allowing improper charges to be made to allottees in connection therewith;
- (5) Failure to pay interest on advance deposit and other funds to allottees;
- (6) Failure to obtain sufficient interest on Indian monies; and
- (7) Excessive charges to the allottees for administrative fees.⁴⁶

The Claims Court eventually combined the four suits under the lead name of plaintiff Helen Mitchell. The Government moved to dismiss the combined case on the grounds that the Claims Court lacked jurisdiction. On January 24, 1979, the Court denied this motion to dismiss, holding that it held jurisdiction under the General Allotment Act of 1887.⁴⁷ The Government subsequently appealed this decision to the United States Supreme Court.⁴⁸

On April 15, 1980, in the case of *United States v. Helen Mitchell, et al.* (which is now commonly referred to as *Mitchell I*), the Supreme Court reversed the Court of Claims' decision. It held that the General Allotment Act did not establish a trust relationship with the plaintiffs and that any claims for recovery must be based on other sources.⁴⁹ After the case was remanded to the Court of Claims to consider other facets of the plaintiffs' complaints, the Government again moved to dismiss the litigation. The Court of Claims again denied a motion for dismissal in 1981, holding that other Federal statutes dealing with timber sales and regulations, sustained yield, and rights-of-way justified the plaintiffs' cause for action.⁵⁰ In response, the Government again resorted to an appeal to the Supreme Court.⁵¹

In the 1983 case of *United States v. Helen Mitchell, et al.* (or *Mitchell II*), the Supreme Court affirmed the decision of the lower Court, holding that the other statutes cited by that Court establish a trust relationship with the plaintiffs and that the Government in its role as trustee was liable for damages in any case where it had breached its fiduciary responsibilities.⁵² The

⁴⁶ U.S. Court of Claims, *Helen Mitchell, et al., including the Allottees Association and the Quinault Tribe v. The United States*, Opinion, 1/24/1979 219 Ct. Cl. 95, 591 F.2d 1300, 1979 U.S. Ct. Cl. LEXIS 20, print pp. 2-3.

⁴⁷ U.S. Court of Claims, *Mitchell, et al., v. U.S.*, Opinion, 1/24/1979, print pp. 1-2.

⁴⁸ U.S. Supreme Court, *United States v. Mitchell, et al. (Mitchell I)*, Decision, 4/15/1980, 445 U.S. 535, 1980 U.S. LEXIS 32, print p. 6.

⁴⁹ U. S. Supreme Court, *Mitchell I* Decision, 4/15/1980, print pp. 1, 4,9-10.

⁵⁰ U.S. Court of Claims, *Helen Mitchell, et al., v. The United States*, Opinion, 10/21/1981, 229 Ct. Cl. 1, 664 F.2d 265, 1981, U.S. Ct. Cl. LEXIS 521, print pp. 1-2.

⁵¹ U.S. Supreme Court, *United States v. Mitchell, et al. (Mitchell II)*, Decision, 6/27/1983, 463 U.S. 206, 1983 U.S. LEXIS 90 print pp. 1, 7.

⁵² U. S. Supreme Court, *Mitchell II* Decision, 6/27/1983, print pp. 1-2, 14-16.

Mitchell II decision is one of the most significant precedents in American Indian jurisprudence because it was the first Supreme Court decision to hold that the United States could be held liable for monetary damages for failure to uphold its trust responsibilities.⁵³

The *Mitchell* case was returned to the Court of Claims for hearing. On August 29, 1989, in a final judgment that combined Dockets 771-71, 773-71, 774-71, and 775-71, the Court awarded \$26.6 million to the plaintiffs. Of this amount, the Court ordered the Government to pay the Quinault Indian Nation (the new name adopted by the Quinault Tribe of Indians) \$600,000 for “Tribal Fisheries and Interests Claims” that were part of the litigation. It provided further that the balance of the award was to be held in escrow by the BIA for the members of the Nation to eventually be disbursed upon approval of a judgment plan in accordance with the

On March 4, 2004, Congress approved a plan for the distribution of the \$600,000 fisheries award to the Nation plus an additional \$600,000 of accrued interest. This statute, Section 301 of Public Law 108-204, provided that these monies were to be used by the Nation to establish and manage a Permanent Fisheries Fund to finance specific enhancement projects.⁵⁴

In a landmark case that affirmed the Federal Government’s trust responsibilities regarding the management of Indian trust assets—in this case, forest lands—the U.S. Court of Claims awarded the Quinault Tribe \$600,000. **NEED TO DETERMINE DISPOSITION OF FUNDS. ALSO, NEED MORE BACKGROUND ON BOTH RULINGS**

⁵³ Nell Jessup Newton, ed., *Cohen’s Handbook of Federal Indian Law: 2012 Edition* (New York: LexisNexis-Matthew Bender, 2012), pp. 422-24.

⁵⁴ 118 Stat. 542, § 301.

Judgment Awards:

Docket No.	Award Date	Amount	Effective Date	Disposition of Funds	Nature of Claim
ICC 242 ⁵⁵	4/17/1967	\$205,172	5/27/1965	To be determined by tribal government with approval of the Secretary of the Interior.	Additional Compensation for lands ceded by the Treaty of 1855-56
Ct. Cl. 772-71, 773-71, 774-71, 775-71 ⁵⁶	8/29/1969	\$600,000	9/1989	Used exclusively to establish and manage the Quinault Permanent Fisheries Fund.	Compensation for Government's mismanagement of timber resources.

⁵⁵ BIA, Draft Table on Indian Claims Cases, 2/24/2005, p. 59 [MA-5910]; and Act of May 27, 1965 [79 Stat. 11847].

⁵⁶ BIA, Draft Table on Indian Claims Cases, 2/24/2005, p. 59 [MA-5910]; and ???????