

**HOOPA VALLEY TRIBAL COMMENTS ON  
E.4.a Council Recommendations for 2017 Management Alternative Analysis - Reports and  
Comments of Advisory Bodies and Management Entities**

In 2017, the Hoopa Valley Tribe (HVT) shall be observing its most sacred ceremonies. We celebrate the renewal of the river and abundance of fish upon which our people have relied for thousands of years. As we look for solutions to problems affecting our fishery we certainly recognize marine productivity and drought as driving factors over which most have no control. However, we have also identified several areas of management of our rivers and fish populations which are controllable.

The Tribe recently was in the unfortunate circumstance of suing the federal government over management of the Klamath Irrigation Project. In that suit, US Bureau of Reclamation and NOAA Fisheries were named defendants and the complaint alleged failure on the part of agencies to comply with the requirements of the ESA. In 2014 and 2015, levels of infection of juvenile Chinook rose to levels far exceeding those established in the Biological Opinion regarding operations of the Klamath water project. The prevalence of high disease levels in out migrating Chinook detected in 2014 and 2015 took a further toll on the resource upon which our Tribe has depended since time immemorial. Specifically, these infected fish were representatives of the 2013 and 2014 brood years which today are among the least, if not the least abundant adult age cohorts of KRFC expected to contribute to 2017 fisheries.

The Tribe has also cautioned the Council regarding the allowance for fall fisheries affecting Klamath River fall Chinook (KRFC). As the Council is aware, impacts occurring in these so called “credit card” fisheries have on occasion led to management constraints in subsequent year’s fisheries. Generally, we are concerned that with the unprecedented low abundances of KRFC, ocean fisheries last fall have already removed some of the precious few fish available this season. The recurring allowance of fall fisheries should mandate the development of methods to anticipate impacts upon conservation needs and harvest opportunities in the subsequent management year.

Finally, the Tribe expresses concern regarding Chinook by-catch in the whiting fishery managed by the Council. Presentations by NOAA scientists over the past year demonstrate that a significant portion of impacted Chinook may be originating from the Klamath-Trinity Basin. In years of low abundance, the Tribe fears that compounding effects of fishery and habitat management result in further decreasing opportunities for fisheries to share in any remaining harvestable surplus of KRFC.

We are actively working with co-managers to seek resolution of disease issues affecting our juvenile salmon pending the removal of Klamath Dams. Meanwhile, we urge the Council to critically review the purpose for late season fisheries and the consequences of these fisheries. Additionally, we see the need for more accurate data collection within the whiting and proposed ground fish sectors to enable quantitative accounting of impacts upon the KRFC.

We ask that during their deliberation of alternatives, the Council recognize the hardship faced by our Tribe is this year of exceptionally low stock size.