

**HOOPA VALLEY TRIBAL COMMENTS ON
Klamath River Fall Chinook (KRFC) Stock Assessment and Management
Recommendations**

My Name is Michael Orcutt, and I am the Director for the Hoopa Valley Tribe's Fisheries Department.

The Salmon Technical Team (STT) has released its evaluation of the Klamath River Fall Chinook (KRFC) Overfishing Concern stemming from three consecutive years (2004 - 2006) of failing to achieve the conservation standard (35,000 natural adult Fall Chinook). Pursuant this and general stock assessment and management we offer the following recommendations.

(1) We support the implementation of the STT's Recommendation #1 of the "Assessment of Factors Affecting Natural Area Escapement Shortfall of Klamath River Fall Chinook (KRFC) Salmon in 2004-2006). That recommendation states:

"Consider the Overfishing Concern of KRFC ended when a natural spawning escapement of at least 35,000 adults is achieved in three out of four consecutive years with a natural spawning escapement of 40,700 adult KRFC (S-MSY) or more in at least one of those three years."

(2) The overlay of Amendment 15 on the preexisting conservation standard for KRFC of the FMP with the special concern of a rebuilding plan presents the PFMC and dependent fisheries with some ambiguity as we move toward developing management alternatives for Klamath fall Chinook. Our perspective is that in any year, the FMP conservation threshold of no less than 35,000 adult natural spawners be sustained in every year. The Tribe supported this standard in the late 1980s as part of the historic harvest sharing agreement. In 2005, the STT recommended 40,700 as the best estimate of a natural spawner population needed to produce Maximum Sustainable Yield from the aggregate Klamath stock.

(3) Recommend to Co-Managers that a 25% Constant Fractional Marking coded-wire-tagging program be implemented at Iron Gate Hatchery. The facility releases between 5-6 million juvenile chinook annually and marking rates presently vary inter-annually and are typically well below 10% of production. Implementation of a 25% CFM strategy at IGH would improve management precision by improving estimates of contribution of Klamath chinook to fisheries. HVT pioneered CFM at Trinity River Hatchery over ten years ago, and the approach has recently been introduced to Central Valley hatcheries.