



YUROK TRIBE

190 Klamath Boulevard • Post Office Box 1027 • Klamath, CA 95548

November 11, 2021

Marc Gorelnik, Chairman
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 101
Portland, Oregon 97220-1384

Re: SONCC Harvest Control Rule Recommendation

Mr. Gorelnik:

On behalf of the Yurok Tribe, I submit these comments regarding the Harvest Control Rule (HCR) for Southern Oregon Northern California Coast (SONCC) Coho salmon that is being considered by the Pacific Fisheries Management Council (PFMC). Based on our review of the analyses contained within the draft report titled *Pacific Fishery Management Council Southern Oregon/Northern California Coho Salmon: Fishery Harvest Control Rule Risk Assessment* (Risk Assessment) drafted by the ad-hoc technical group formed by the PFMC, I recommend that the PFMC choose a preferred alternative that has an overall (marine and freshwater fishery impacts combined) exploitation rate (ER) of 16% (Harvest Control Rule # 6).

The Yurok reservation is located on the lower 44 miles of the Klamath River. All Klamath Basin anadromous fish pass through our reservation as juveniles migrating to the ocean and as adults returning to spawn. The Klamath River fishery resource, including Coho salmon, is integral to the Yurok way of life for sustenance, culture, religion, and commerce.

Out of concern for the future of our Coho populations, we began managing our fishery to protect Coho salmon in the early 1990's, several years before SONCC Coho salmon were listed under the ESA in 1997. We will continue to manage our fishery in a manner that conserves this species, however harvest management alone will not be enough to alter the trajectory toward extinction that this species seems to be following.

Meaningful improvements to freshwater habitat, including improved water quality and adequate water quantity within the mainstem Klamath river and its tributaries, need to be addressed for this species to recover. Hatchery practices within the basin also need to be modified with an eye toward producing a more fit stock. Analysis from the Risk Assessment shows that populations within the Klamath Basin most influenced by hatchery strays (the Trinity River, Bogus Creek, and the Shasta River) have extremely low productivity. According to the Risk Assessment, these Coho salmon

populations are at relatively high risk of going extinct within the next 20 years regardless of whether they receive harvest impacts.

The Scott River is the only other Klamath Basin Coho population that had a sufficient data set for analysis in the Risk Assessment. The Scott River population receives few (if any) hatchery strays, and therefore may be more representative of other populations in the SONCC ESU that have minimal hatchery influence. The Scott River population has relatively minimal risk of going extinct over the next 20 years, regardless if an overall exploitation rate of 13% or 16% is chosen. If there were an exploitation rate of 13% (HCR #3) the Risk Assessment estimates there would be a 15.5% chance the Scott River population would go extinct over the next 20 years and this risk increases to 18.6% if there were a 16% exploitation rate (HCR #6). Given the relatively minor increase in risk to the Scott River population from having a 16% vs. a 13% exploitation rate, and the benefits that would accrue to the fisheries from a 16% relative to lower exploitation rates (Figure 40 of the Risk Assessment), I recommend that the PFMC choose HCR #6 (E.R. of 16%) as the preferred alternative.

If you have any questions regarding this recommendation, please don't hesitate to contact me at the address in the letterhead.

Sincerely,

A handwritten signature in black ink, appearing to read "Joseph L. James". The signature is fluid and cursive, with the first name "Joseph" being the most prominent.

Joseph L. James, Chairman