

**HOOPA VALLEY TRIBAL COMMENTS ON
D.2.e Tentative Adoption of 2022 Management Measures for Analysis--Reports and
Comments of Management Entities and Advisory Bodies**

The Hoopa Valley Tribe (Tribe) thanks the PFMC (Council) for this opportunity to comment regarding the tentative adoption of 2022 Salmon management measures for analysis. The Tribe has prosecuted its fishery for Klamath River Fall Chinook (KRFC) and Klamath Basin Coho Salmon on lower Trinity River and mid-Klamath River since time immemorial. Exercise of our reserved fishing right and ensuring the health of our fisheries are the fundamental foundations of our existence.

With regard to the 2022 Chinook Salmon management, the Tribe is concerned that all three alternatives incorporate elevated conservatism to address the excessive exploitation of listed California Coastal Chinook (CCC) stocks seen in recent years. The surrogate CCC consultation standard is for no greater than 16% KRFC ocean age-4 harvest rate in any year. Accordingly, the STT recommended and the PFMC adopted pre-season estimated KRFC age-4 harvest rates informed by the most recent observed fishery regimes and contact rates from 2015 forward. Citing concern with whether this adjustment would achieve the CCC consultation standard, NMFS revised guidance of March 2022 called for no greater than a 10% KRFC age-4 harvest rate for 2022 ocean fisheries. While we understand and appreciate NMFS' concern for listed species protection, they have stated that added conservatism is intended to ACHIEVE a 16% KRFC ocean age-4 harvest rate by targeting 10%.

In the perceived balance between the interests of fisheries and the needs of the fish, the Tribe is concerned that the mechanism for conserving CCC may be overly conservative and could limit otherwise greater access to KRFC. Evaluating and correcting sources of bias in the pre-season process is in the best interest of all fisheries and correcting KOHM bias with regard to the estimation of KRFC ocean age-4 harvest rates is appropriate. However, in this case, the repercussions of compounding safeguards to protect CCC, include potential effects upon KRFC *de minimis* tribal fishery opportunity. This potential consequence does not appear to have been thoroughly explored in the present suite of alternatives.

The Tribe is relentless in its quest to address water and land management conservation consistent with fishery preservation so that our cultural ways and existence may be passed on to our subsequent generations. We look forward to partnering with our federal, state and tribal comanagers to continue to find new ways in rehabilitating our once thriving fisheries.