

HOOPA VALLEY TRIBAL COMMENTS ON  
D.5.A RECOMMENDATIONS FOR 2023 MANAGEMENT ALTERNATIVE 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 2023 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 rights and ensuring the health of our fisheries are the fundamental foundations of our existence.

With regard to the 2023 Chinook Salmon management, the Tribe shares the concerns expressed by NMFS in their guidance letter (Agenda Item D.3.b, Supplemental NFMF Report 1, March 2023). Indeed, despite a focused effort in 2022 to further address the successive years' exceedances in modeled age-4 KRFC marine harvest rates, KRFC contact rates were to be estimated using the most recent years data while consistent with NMFS' guidance, the KRFC age-4 harvest rate was to be no greater than 10%. In spite of these safeguards, marine fisheries exceeded the 10% objective almost four-fold. Preliminarily, it appears that more than 14,000 adult KRFC may have been taken in these fisheries (Table II-3, STT Preseason Report 1, 2023). By comparison, Klamath Basin tribal harvest guideline for the '22 season restricted harvest to a total of 9,400 KRFC adults while only 8,000 were estimated to have been harvested given the lower than forecast river run-size.

Presently, we are aware of further conservative measures being applied to 2023 management of KRFC including a revision of the historic data used for estimating ocean abundance through sibling regressions by using the most recent ten years of data rather than the entire suite of historic data. Additionally, NMFS and California representatives are calling for real-time monitoring and in season management of recreational fisheries and the commercial fleet. The Tribe appreciates the attention to the needs for KRFC and, in particular, to the focus upon better science to anticipate and achieve pre-season management objectives in marine fisheries.

We understand the significant challenge in anticipating annual harvest rates in mixed-stock ocean fisheries. However, the Tribe can only access fish which return to our Reservation area and works with the PFMC in identifying appropriate conservation targets for natural area escapement. The Tribe's Fisheries Department conducts intensive monitoring of its individual Tribal member fishery and routinely reports its findings directly to the Tribal Council, the Tribe's management authority. Historically, a minimum emergency subsistence and ceremonial need of 12,000 adult KRFC were identified for Klamath Basin tribes. However, given the expected low abundance our Tribal Council will need to weigh this emergency need against conservation spawner escapement needs as identified in the KRFC Control Rule. To fulfill the needs of this Council process, we suggest the STT use the minimum subsistence and ceremonial need of 12,000 adult KRFC for modeling purposes.

Such work remains to be done to tackle greater obstacles facing the ultimate recovery of these salmon stocks. Restricting fisheries is not a solution, but a necessary self-imposed measure which

compensates for other sources of fish mortality. 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.

To that end I will highlight the water management issue on the Klamath that was briefly mentioned in the Habitat Committee Report. (Agenda Item E.1.a Supplemental HC Report 2, March 2023). There are two competing Biological Opinions in the Klamath, one focused on coho below Iron Gate Dam, the other on Lost River and Short-nosed suckers in Upper Klamath Lake. Both BiOps protect a tribal trust species important to the tribes of the respective areas. In the final months of the 2022 water year, the Bureau of Reclamation released 68 thousand acre feet of water to the Klamath Project beyond what was initially planned. Days after the new water year started in October, they warned that the lake levels were dangerously low and that the minimum Klamath River flows defined in the BiOp may not be met. Over the objections of the Hoopa Valley and Yurok Tribes, Reclamation, using more conservative water forecasting tools than previous years and claiming extreme drought conditions despite over 100% of average snowpack, cut flows by 11% and two weeks later by an additional 5%. This action had the immediate effect of dewatering salmon and steelhead redds. If this action continues juvenile salmon will have less habitat available, and as weather warms disease levels in the mainstem Klamath could skyrocket. Poor survival this year will affect Council managed fisheries for the next 3 to 4 years. We look forward to partnering with our federal, state and tribal comanagers to continue to ensure adequate conditions for salmon in the freshwater environment and find new ways to rehabilitate our once thriving fisheries.