

**HOOPA VALLEY TRIBAL COMMENTS ON
Klamath River Fall Chinook Workgroup Report and 2024 Management Options**

The Hoopa Valley Tribe (HVT) is an active participant in the Klamath River Fall Chinook (KRFC) Ad Hoc Workgroup and presently advocates for the “status quo” alternative presented in the workgroup’s report. The HVT has resided along the lower Trinity River and been sustained by the bounty of the river’s salmon runs since time immemorial. While HVT is generally supportive of the removal of the Klamath River dams, we have many concerns regarding how the dam removal process will affect the environment, salmon populations, and our ability to prosecute meaningful Tribal fisheries. A particular concern for the upper Klamath would be the reach above Keno Dam where water quality issues hostile to anadromy will not be corrected through the removal of the lower four dams.

It is anticipated that in the long-term, the removal of the Klamath River dams will increase the productivity of salmon populations and bolster fisheries, but for this to occur spawners must stray into and recolonize the newly available habitat, a process which could take many years. The vast majority of spawners straying into the newly available habitat above the Iron Gate Dam site will likely be of Iron Gate/Fall Creek Hatchery origin or from natural spawning populations which are in relatively close proximity to the new habitat. It seems fairly unlikely that strays from Trinity River and other populations in the lower reaches of the Klamath River would play a significant role in the recolonization of the upper Klamath River. Meanwhile, the HVT has consistently expressed concern over the progressive loss of Iron Gate Hatchery mitigation as the dam removal proceeds. Mitigation has been relocated to Fall Creek at a much reduced level and is planned for elimination within 8 years.

KRFC are currently managed as an aggregate of all stocks in the Klamath-Trinity Basin. Accordingly, the current management tools lack the specificity needed to simultaneously increase the escapement of upper Klamath stocks for recolonization while allowing for targeted fisheries upon lower Klamath and Trinity River stocks which would not likely contribute to recolonization. HVT has long advocated for the management of KRFC in a river-by-river, run-by-run framework. With the removal of the four lower Klamath River dams this year, the HVT believes developing a more focused management structure is essential.

The 2024 interim alternatives proposed in the KRFC Ad Hoc Work Group Report are all rooted in the traditional aggregate management approach of the KRFC harvest control rule (HCR) and would provide no guarantee that reductions imposed across all fisheries would in fact substantially increase the escapement of the specific stocks most likely to aid in the recolonization of the upper Klamath River. Accordingly, the HVT recommends that the Council opt for the “No action” alternative and maintain the status quo HCR for 2024 management.

While it may be several generations of Chinook before a new stock-recruit relationship would inform revised management, the workgroup has offered an updated analysis with results in Table 4.2 which suggest that under current management, Smsy is currently 3,000 greater than the current model would predict. Hence, an inherent buffer for aggregated management of KRFC HVT is already in place with status quo management. Furthermore, in the comparison of maximum exploitation and minimum natural area escapement across alternatives (Figures 5.8 through 5.11) the contrast between alternatives with respect to enhanced escapement is marginal under most abundance scenarios but most pronounced under the “high abundance” scenario where natural spawners would exceed 70,000 adults. Hence, based upon past fluctuations of abundance, there would be opportunities to facilitate colonization under the no action, status quo alternative.

HVT is supportive of alterations to the KRFC HCR in support of accelerated recolonization of the upper Klamath Basin, but not at the expense of undue impacts to our Tribal fisheries which are focused on stocks that would likely not contribute to the recolonization effort. HVT hopes that the Council will instruct the KRFC Ad Hoc Work Group to continue to convene and explore potential management strategies which would embrace a more directed recolonization effort in support of the upper Klamath River while allowing for more stock-specific management basin wide.