

**HOOPA VALLEY TRIBAL COMMENTS ON  
G.8 Adoption of 2012 Management Alternatives for Public Review**

In the coming weeks, the HVT will be considering management alternatives for its Chinook fisheries in 2012. We are guided by our interest in meeting objectives for stock conservation and best science.

Amendment 9 of the Salmon FMP provided for variability in parental stock size to allow estimation of productivity for Klamath River Fall Chinook (KRFC). Early indications suggest that the 2009 brood has performed exceptionally well. In 2012, the first adult members of this cohort will return to spawn in Klamath and Trinity basins. In addition to the bounty this anticipated abundance is expected to provide to our fishers and those of the non-tribal communities, this natural spawner return coincides with an era of unprecedented investment in habitat restoration.

The anticipated 86,000 natural area adult spawners anticipated in 2012 represent the fifth highest natural area escapement in 31 years of record. However, most of the remaining high escapement years occurred prior to 1996 and well before the great strides made in Trinity River fish habitat restoration.

The Hoopa Valley Tribe (HVT), is exclusively dependent upon the well being and future vitality of the KRFC. That is why the HVT has invested so greatly in the struggle to reverse habitat degradation initiated by those who sought their riches in the extraction of gold, or in the export of our water. We are hopeful that in time escapements of this magnitude will be well within the norm for the Klamath Basin. Indeed, the escapement objective for Trinity River alone under the Trinity Restoration Program is for 62,000 naturally produced adults annually.

With regard to the marine fishery alternatives being scoped for 2012, we are troubled with the resurgence of late season fisheries. The HVT has consistently been opposed to these so called “credit card” fisheries that are often proposed for the KMZ in September. We reiterate our opposition for this season’s management given the uncertainty such a strategy invites. No methodology presently exists for anticipating impacts of these fall fisheries. While credit card fisheries may have some appeal this year given the predicted strength of the 2009 brood of KRFC, ample evidence demonstrates substantial imprecision in the age-3 forecasts based on sibling relationships. Since 2000, the pre-season forecast, though unbiased, has overestimated the post-season estimated stock size by almost two-fold on several occasions.

A further departure from rational management would be to allow any commercial fishery within the KMZ without a precautionary quota. For many years now, all commercial fisheries within the KMZ have been conditioned upon a quota cap. The notion of quotas is very familiar to the terminal fisheries, where the stock mix is limited. Similarly, in proximity of the Klamath river mouth, distributions of Chinook are dominated by KRFC,

particularly in the fall. An unexpected shift in effort into the KMZ this fall, coinciding with an imprecise stock strength forecast could readily compromise fishery options for 2013.

In summary, we are strongly discouraging credit card fisheries, particularly those which would operate in the absence of a quota safeguard.