Environmental Assessment to Analyze Impacts of NOAA's National Marine Fisheries Service Determination that the Yurok Tribe's Tribal Resource Management Plan Meets the Requirements of the Endangered Species Act Tribal 4(d) Rule

Final Environmental Assessment

March 27, 2026

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Page and Time Limit Certification

NOAA has considered the factors mandated by NEPA; this EA represents NOAA's good-faith effort to prioritize documentation of the most important considerations required by the statute within the congressionally mandated page limits; this prioritization reflects NOAA's expert judgment; and any considerations addressed briefly or left unaddressed were, in NOAA's judgment, comparatively not of a substantive nature that meaningfully informed the consideration of environmental effects and the resulting decision on how to proceed.

This EA represents NOAA's good-faith effort to fulfill NEPA's requirements within the congressionally mandated timeline; the effort is substantially complete; in NOAA's expert opinion, it has thoroughly considered the factors mandated by NEPA; and in NOAA's judgment, the analysis contained in this EA is adequate to inform and reasonably explain NOAA's final decision regarding the proposed action.

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Table of Contents

TABLE OF CONTENTS ..... **I**

TABLE OF TABLES ..... **II**

TABLE OF FIGURES ..... **II**

1.0 INTRODUCTION **1**
1.1 Background 1
1.2 Proposed Action 2
1.3 Purpose and Need 2
1.4 Project Area 2

2.0 DESCRIPTION OF ALTERNATIVES INCLUDING THE PROPOSED ACTION **4**
2.1 Alternative 1 (No Action) 4
2.2 Alternative 2 (Preferred Alternative) 4
2.2.1 TRMP Objectives 5
2.2.2 The Yurok Tribe's Fishery 6
2.2.3 Monitoring and Evaluation of the Yurok Tribe's Fishery 8
2.2.4 Expected Exploitation Rates 8
2.2.5 Reporting 8
2.2.6 Annual Review and Re-Evaluation of the TRMP 9

3.0 AFFECTED ENVIRONMENT **9**
3.1 Salmon and Steelhead 10
3.1.1 Fisheries 11
3.1.2 Habitat 14
3.1.3 Hatcheries 15
3.2 Other Fish Species 16
3.3 Pinnipeds 17
3.4 Cultural Resources 18
3.5 Socioeconomics 19

4.0 ENVIRONMENTAL CONSEQUENCES **19**
4.1 Alternative 1 – No Action Alternative 20
4.1.1 Salmon and Steelhead 20
4.1.2 Other Fish Species 20
4.1.3 Pinnipeds 21
4.1.4 Cultural Resources 21
4.1.5 Socioeconomics 21
4.2 Alternative 2 (Preferred Alternative) - Proposed Action 21
4.2.1 Salmon and Steelhead 21
4.2.2 Other Fish Species 22
4.2.3 Pinnipeds 22
4.2.4 Cultural Resources 23
4.2.5 Socioeconomics 23

5.0 LIST OF PREPARERS **23**

6.0 LITERATURE CITED **24**

Table of Tables

Table 1. Performance standards and performance indicators from the Yurok Tribe's TRMP. 6
Table 2. Harvest by species during the Yurok tribal fall fishery 2011 – 2020 (Yurok Tribe 2023). 12
Table 3. ERs for SONCC coho salmon caught in ocean, tribal, and freshwater recreational fisheries (NMFS 2022d).....13
Table 4. Status of other native fish species in the project area.....17
Table 5. Harvest of Chinook salmon, ex-vessel value, and economic impact of the Yurok Tribe's commercial fishery during 2007 -2020 (Yurok Tribe 2023). 19
Table 6. List of preparers and their roles in preparing the EA. 23

Table of Figures

Figure 1. Map of the Klamath River Basin with the boundaries of the Yurok Tribe's Reservation, demarcated by the red line, and the Hoopa Valley Tribe's Reservation, demarcated by the purple dotted line (Yurok Tribe 2023). The Iron Gate and both Copco dams shown on the map have been removed.....3
Figure 2. Map of the fishery management areas on the Yurok Reservation, CA (Yurok Tribe 2023). 7
Figure 3. Klamath River Basin (Klamath and Trinity Rivers) Adult Fall-Run Chinook Salmon Natural Escapement Estimates, 1978-2023. 2023 data are preliminary (CDFW 2024).....11
Figure 4. Modeled effects of fixed ERs on the risk of falling below critical wild population abundance thresholds (PFMC 2021).....14

1.0 INTRODUCTION

1.1 Background

NOAA's National Marine Fisheries Service (NMFS) is the lead agency responsible for administering the Endangered Species Act (ESA) as it relates to salmon and steelhead. Actions that may affect listed species are reviewed by NMFS under Section 7, Section 10, or Section 4(d) of the ESA. Actions approved under these sections can be used to limit the application of take prohibitions described in Section 9 of the ESA. NMFS issued a final rule pursuant to ESA Section 4(d) (4(d) Rule), adopting regulations necessary and advisable to conserve threatened salmonid species (50 CFR 223.203). Similarly, NMFS issued a final rule specifically for Tribal Plans known as the Tribal 4(d) Rule (50 CFR 223.204), which intends to harmonize statutory conservation requirements with tribal rights and the Federal trust responsibility to tribes (65 FR 42481). These 4(d) Rules apply the take prohibitions in Section 9(a)(1) of the ESA to salmon and steelhead and also set forth specific circumstances when the prohibitions will not apply, known as 4(d) Limits. With regard to fisheries management described in a Tribal Resource Management Plan (TRMP), NMFS declared in the Tribal 4(d) Rule (50 CFR 223.204) that Section 9 take prohibitions would not apply to activities carried out under a TRMP as long as NMFS has determined that the TRMP will not appreciably reduce the likelihood of survival and recovery of listed species. NMFS' determination is a Federal action and requires National Environmental Policy Act (NEPA) analysis. This draft Environmental Assessment (EA) analyzes the impacts of the NMFS determination on a TRMP prepared by the Yurok Tribe.

On April 23, 2023, NMFS received a TRMP and associated transmittal letter from the Yurok Tribe requesting formal consultation on the Yurok Tribe's TRMP under the ESA (Yurok Tribe 2023). NMFS reviewed the TRMP and responded with a letter on June 6, 2023 indicating that the TRMP contained sufficient information for NMFS to begin its analysis under the provisions of the Tribal 4(d) Rule. The objective of the TRMP is to provide the Yurok Tribe harvest opportunity in a manner that does not jeopardize the existence of the Southern Oregon/Northern California Coast (SONCC) Coho Salmon Evolutionarily Significant Unit (ESU). As per the Tribal 4(d) Rule, NMFS assisted the Tribe during the development of the TRMP through policy and technical staff level communications. This communication provided an opportunity for NMFS to provide technical assistance, exchange information, discuss conservation needs of the listed species, and discuss the importance of the action in relation to tribal fishing rights that exist under federal law and Federal trust responsibilities.

Consistent with requirements of the Tribal 4(d) Rule, NMFS assessed the TRMP and prepared a Proposed Evaluation and Pending Determination (PEPD) as to whether implementation of the TRMP will appreciably reduce the likelihood of survival and recovery of ESA-listed salmon and steelhead. The PEPD was posted on the NMFS website and a notice of availability was posted in the Federal Register on July 28, 2025 (90 FR 35512). The public comment period expired on August 27, 2025. We received one comment letter on the information contained in the PEPD. The comments did not alter the pending determination. The draft EA and public comments on the PEPD will be considered in developing a final Evaluation and Recommended Determination

(ERD) and a final EA. This EA documents NMFS' analysis of the environmental effects of the Yurok Tribe's TRMP on the human environment. NMFS will also evaluate the effects of the NMFS determination on ESA-listed species under Section 7 of the ESA prior to making a final determination.

1.2 Proposed Action

The proposed action is a determination by NMFS as to whether the Yurok Tribe's TRMP meets the requirements of the Tribal 4(d) rule, including whether the implementation of the TRMP would appreciably reduce the likelihood of survival and recovery of the SONCC Coho Salmon ESU.

The Yurok Tribe's TRMP describes the tribe's fall/winter fishery in the Klamath River within the boundaries of the Yurok Reservation (see section 1.4 for a description of the project area). The fishery primarily harvests fall Chinook salmon, however coho salmon, steelhead, sturgeon, and spring Chinook salmon are also harvested. The Yurok Tribe prioritizes fishing for subsistence and ceremonial purposes, but if the abundance of Chinook salmon is large enough, the Tribe may allow commercial fishing for Chinook salmon (commercial fishing for coho salmon is not allowed). Only one commercial fishery has occurred since 2015 due to low predicted abundance of Chinook salmon in most years. The TRMP includes a system of monitoring, evaluation, and reporting to ensure that the fishery is implemented without jeopardizing the SONCC Coho Salmon ESU. The fishery, and associated monitoring activities, are described in detail in Section 2.2.

1.3 Purpose and Need

The purpose of the proposed action is to determine whether the Yurok Tribe's proposed TRMP complies with the requirement of the ESA Tribal 4(d) Rule, consistent with the Tribe's fishing rights under federal law and NMFS' tribal trust responsibilities. Compliance with the Tribal 4(d) Rule will ensure that the activities described in the TRMP would not appreciably reduce the survival and recovery of ESA-listed SONCC coho salmon. The need for the proposed action is to provide for meaningful exercise of tribal fishing rights while also implementing the requirements of the ESA. The goals and objectives of the Yurok Tribe's TRMP are in Section 2.2 below.

1.4 Project Area

The project area is the geographic area where the activities described in the Yurok Tribe's TRMP will occur. The geographic area of the TRMP is the section of the Klamath River that lies within the boundaries of the Yurok Reservation. This section encompasses the lower 44 miles of the Klamath River from the Pacific Ocean upstream to the Yurok reservation boundary located about 2 miles upstream of the confluence of the Trinity River (Figure 1).

The Klamath River runs through southern Oregon and northern California and drains a basin encompassing 12,000 square miles. The headwaters of the Klamath River originate in Oregon and flow through the Cascade Mountain Range to the Pacific Ocean south of Crescent City, California, totaling approximately 263 miles in length.

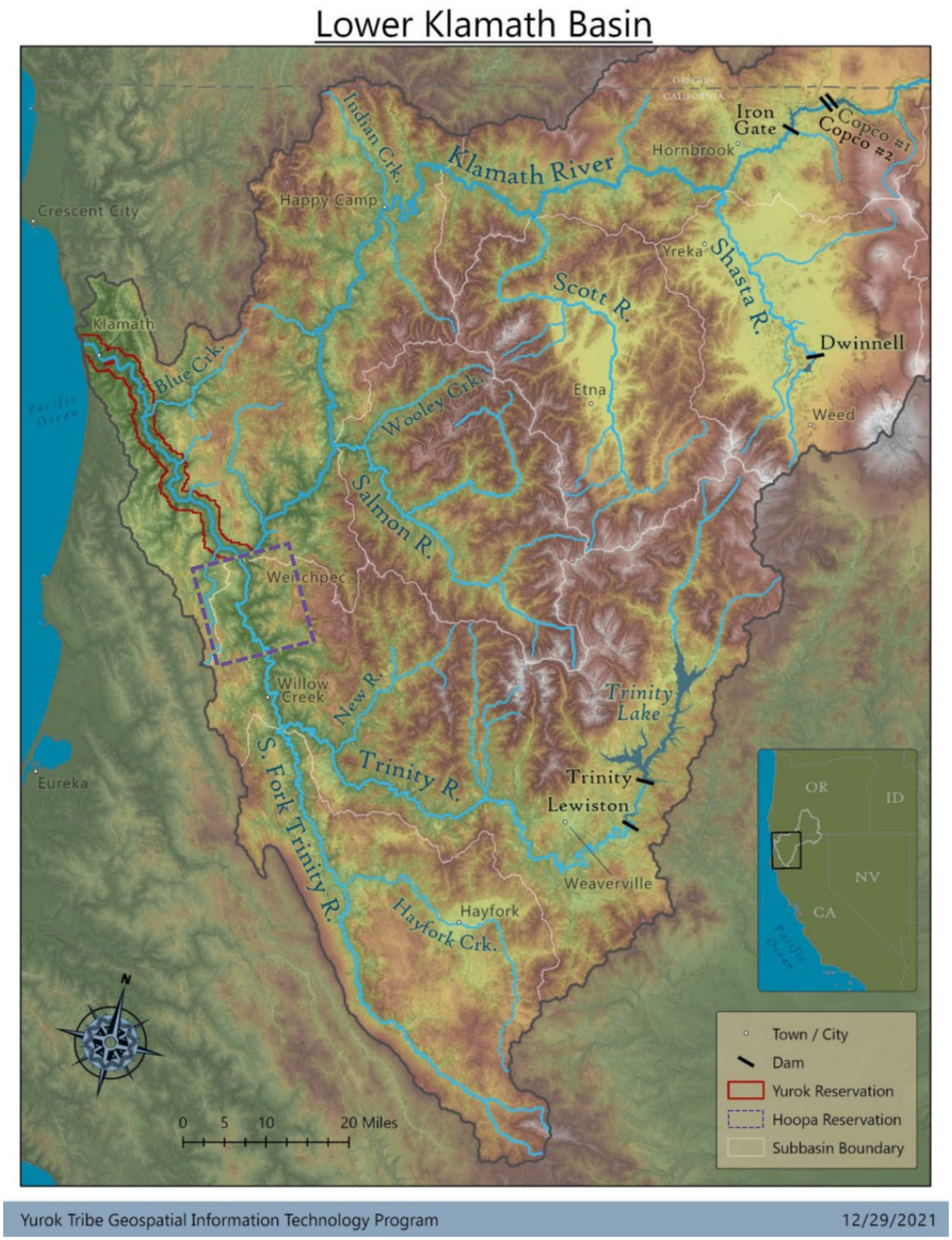

Figure 1. Map of the Klamath River Basin with the boundaries of the Yurok Tribe's Reservation, demarcated by the red line, and the Hoopa Valley Tribe's Reservation, demarcated by the purple dotted line (Yurok Tribe 2023). The Iron Gate and both Copco dams shown on the map have been removed.

2.0 DESCRIPTION OF ALTERNATIVES INCLUDING THE PROPOSED ACTION

Two alternatives are evaluated in this EA: (1) No Action (status quo); NMFS does not issue a determination that the TRMP meets the requirements of the Tribal 4(d) Rule; and (2) Preferred alternative, NMFS issues a determination that the TRMP meets the requirements of the Tribal 4(d) Rule.

A third alternative, a "no fishing" scenario was considered but eliminated from further consideration. Under this alternative the Yurok Tribe would discontinue their fishery. This alternative would not meet the purpose and need (described above) of the proposed action.

2.1 Alternative 1 (No Action)

Under Alternative 1, NMFS would not issue a determination that the TRMP meets the requirements of the Tribal 4(d) Rule. The actions described in the Yurok Tribe's TRMP would not be exempted from ESA Section 9 take prohibitions. NMFS recognizes the possibility that the Yurok Tribe's fishery may continue regardless of the NMFS determination. The Yurok Tribe has a federally reserved fishing right (Office of the Solicitor 1993). NMFS' ESA review of a TRMP does not itself permit the operation of the fishery. In this circumstance, NMFS' role is limited to making a determination as to whether the TRMP meets the requirements of the Tribal 4(d) Rule and whether the activities conducted pursuant to the TRMP would be likely to appreciably reduce the survival and recovery of ESA-listed fish.

Under the no action alternative, NMFS assumes the Yurok Tribe's fishery would continue under current conditions (status quo). The status quo fishery is described in Section 2.2.2. However, under the no action alternative the Yurok Tribe is not likely to proceed with some of the TRMP provisions such as harvest limits for natural origin (NOR) coho salmon, regular reporting to NMFS, triggers for TRMP re-evaluation, and a comprehensive re-evaluation after three years of implementation. These provisions were agreed to during pre-consultation between NMFS and the Yurok Tribe and are intended to improve understanding of the effects of the tribal fishery on the SONCC Coho Salmon ESU.

2.2 Alternative 2 (Preferred Alternative)

Under this alternative, NMFS would issue a determination that the Yurok Tribe's TRMP meets the requirements of the Tribal 4(d) Rule and, as a result, the activities conducted under the TRMP would be exempted from the take prohibitions in ESA Section 9. In this case, the Yurok Tribe's fishery and associated monitoring, evaluation, and reporting would be implemented as described in the Yurok Tribe's TRMP. For the purpose of this analysis, NMFS assumes the proposed action would result in the level of harvest impacts as described in the Yurok Tribe's TRMP. In addition, NMFS assumes the Yurok Tribe's fisheries managers would implement the provisions of the TRMP to ensure that the effects on ESA-listed SONCC coho salmon are monitored and remain within expectations.

The following subsections describe components of the Yurok Tribe's TRMP including:

1) The objectives of the TRMP
2) Description of the Yurok Tribe's fishery
3) Monitoring and evaluation of the fishery
4) Expected exploitation rates
5) Requirements for annual reporting, and
6) Annual review and re-evaluation of the TRMP

2.2.1 TRMP Objectives

The primary objective of the TRMP is to provide salmon harvest opportunities for the Yurok Tribe in a manner that does not appreciably reduce the likelihood of survival and recovery of the SONCC Coho Salmon ESU. The TRMP includes performance standards related to the primary objective and indicators that would be used to assess whether each standard is being achieved. Performance standards and indicators are shown in Table 1.

Table 1. Performance standards and performance indicators from the Yurok Tribe's TRMP.

Performance Standard	Performance Indicators
1. Monitor and evaluate fisheries and limit total impacts on ESA-listed coho salmon	1. Limits for impacts on coho salmon are established and maintained
	2. Fishery is monitored to estimate harvest and sample a portion of the harvest. Sampling includes noting whether observed coho salmon are hatchery- or natural-origin
2. Monitor and evaluate harvest of natural-origin coho salmon	1. Long-term average exploitation rate (ER) of 5.7% on natural-origin coho salmon
	2. Three-year rolling average ER less than 8.1% on natural-origin coho salmon
	3. Number of coho salmon returning to basin hatcheries and primary spawning grounds
	4. Multiyear trends in abundance of natural-origin coho salmon
3. Adhere to terms of the Tribal Resource Management Plan and provide regular reports to NMFS	1. Monitoring and evaluation framework is documented and implemented
	2. Fisheries regulations are enforced
	3. Harvest report provided by February 15 each year
	4. Annual report provided by June 1 each year
4. Provide meaningful harvest opportunities for the Yurok Tribe	1. Fishing effort
	2. Catch-per-unit-effort
	3. Length of fishing season during the coho salmon run relative to past years. Used to assess permissible fishing days during coho salmon run and to re-evaluate relationship between days open and ER

2.2.2 The Yurok Tribe's Fishery

Individual members of the Yurok Tribe have harvested and consumed salmon and steelhead since time immemorial. The Yurok Tribe has a federally reserved fishing right to harvest anadromous fish (Office of the Solicitor 1993). The Yurok Tribe's fishery is conducted in accordance with the Yurok Fishing Rights Ordinance (FRO), which regulates the fishery year-round (Yurok Tribe 2023). The FRO is amended by in-season adjustments that are adopted by the Yurok Tribal Council for special management regulations for the spring fishery, as well as a Fall Harvest Management Plan.

Tribal fishing occurs in the Klamath River within the boundaries of the Yurok Reservation (Section 1.4). For fishery management and monitoring purposes, the Yurok Reservation is divided into three areas: the Estuary, the Middle Klamath, and the Upper Klamath management areas (Figure 2).

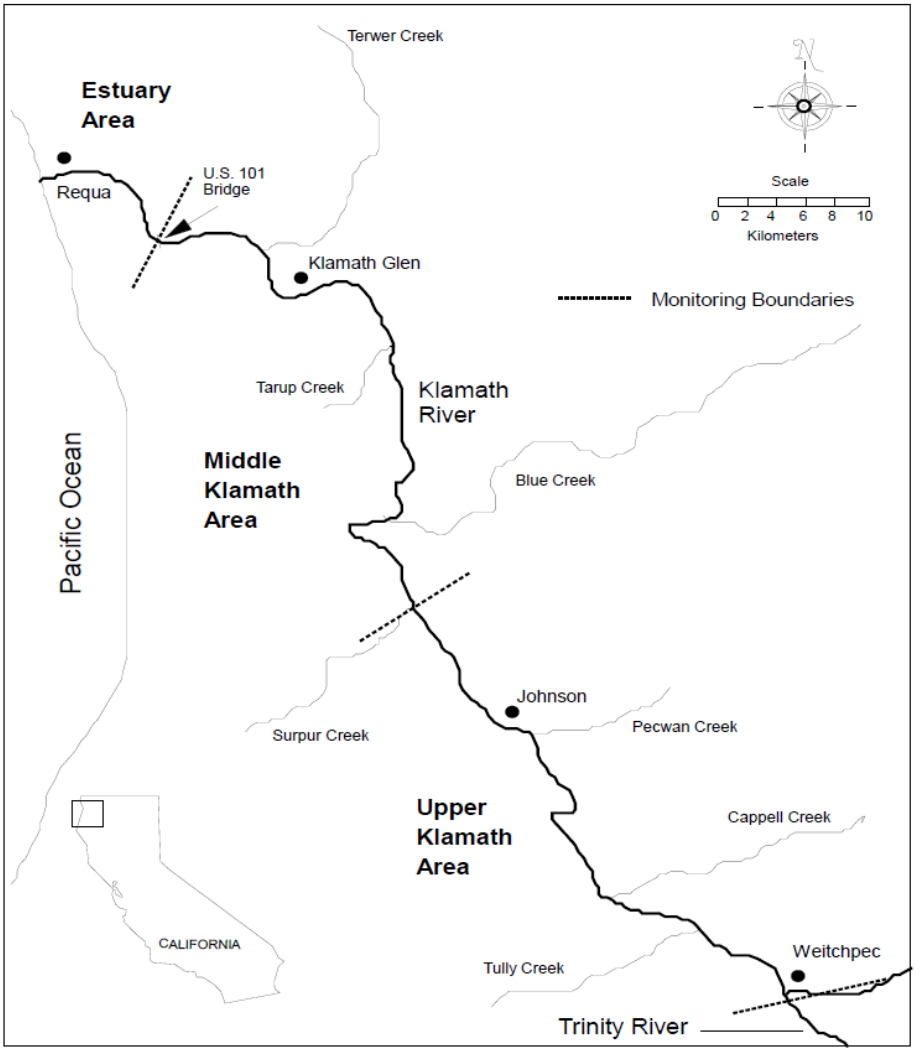

Figure 2. Map of the fishery management areas on the Yurok Reservation, CA (Yurok Tribe 2023).

The Yurok tribal fall/winter fishery primarily targets fall Chinook salmon, but coho salmon, steelhead, sturgeon, lamprey, and spring Chinook salmon are harvested as well. The Yurok Tribal Council prioritizes fishing for subsistence and ceremonial purposes. However, if the Tribal Council determines that the fall Chinook salmon allocation is large enough, they allow commercial fishing for fall Chinook salmon within the estuary management area (Figure 2).

Coho salmon in the project area are in the SONCC Coho Salmon ESU and are listed as threatened under the ESA. Steelhead, Chinook salmon, and sturgeon encountered in the fishery are not listed under the ESA.

Gill nets are the primary gear type used, either via set net fishing or drift net fishing. Other gear types that are used less frequently include dip nets, angling, and traps for lamprey. Set nets, drift nets, and angling can be used in all areas. Dip nets are primarily used in the estuary.

The fishery considered under the proposed action encompasses the period from late July through February. Fishing effort, and associated harvest, decreases substantially by October in the Estuary management area, and by November in the Middle and Upper Klamath management areas.

2.2.3 Monitoring and Evaluation of the Yurok Tribe's Fishery

The TRMP will provide for routine monitoring of the Yurok Tribe's fisheries. The Harvest Management Division of the Yurok Tribal Fisheries Department (YTFD) is responsible for monitoring the fisheries. Harvest information is collected from the three management areas (Estuary, Middle Klamath, and Upper Klamath management areas) of the Yurok Reservation (Figure 2). On days the fishery is open, Yurok Tribal fishers are contacted at their boats, riverside camps, area boat landings, or at the buying station in Requa. Attempts are made to contact tribal fishers at a later time if they could not be located at the river. Harvest information is collected for Chinook salmon, coho salmon, steelhead, green sturgeon, and white sturgeon during the fall fishery, as well as effort, and catch per effort for each gear type. Monitors also record biological data such as length and weight, collect scale samples (used for genetic studies), and retain snouts from adipose-fin clipped salmon for recovering coded-wire tags.

2.2.4 Expected Exploitation Rates

The TRMP states that the Yurok Tribe will continue to manage their fishery in a manner that will targets an average annual ER of 5.7 percent on NOR coho salmon. This is the average ER for the Yurok Tribe's fishery during 2007 – 2019. Additionally, the TRMP states that the Tribe will manage the fishery to not exceed a three-year rolling average ER of 8.1 percent (this is based on the highest three-year rolling average in the Yurok Tribe's fishery during 2007 – 2019). See Table 3 for the ERs on NOR coho salmon resulting from the Yurok Tribe's fishery.

2.2.5 Reporting

The Yurok Tribe will provide a technical memorandum containing the Tribe's coho salmon harvest information for each season to the PFMC, by February 15th of each year. The memorandum will include the number of coho salmon that were harvested in the Yurok fishery, the estimated number of harvested fish that were of natural origin, and the estimated number of harvested coho salmon that were from hatcheries, by age.

Under the provisions of the TRMP, the Yurok Tribe will provide annual reports to NMFS by June 1st of each year. The annual report will summarize the Tribe's coho salmon fishery during the prior year to evaluate the TRMP's implementation against the objectives and performance standards (Table 1).

The annual report that will be provided to NMFS will summarize:

- the number of coho salmon harvested
- the estimated number of natural and hatchery coho salmon harvested
- the estimated ER for natural coho salmon in the Yurok fishery

- the three-year rolling average ER for coho salmon in the Yurok fishery
- escapement of coho salmon to basin hatcheries and spawning areas
- effort in the net fishery
- catch/effort in the net fishery
- days fishing was permitted during periods of the coho salmon run compared with past years

2.2.6 Annual Review and Re-Evaluation of the TRMP

Under the provisions of the TRMP, the Yurok Tribe would conduct an annual review of the implementation of the TRMP. The evaluation would compare the objectives and performance standards, including expected ERs, with the annual results of the Yurok tribal fishery and associated monitoring. The results of the annual review would be described in the annual report to NMFS (Section 2.2.5). There will also be a re-assessment made by the Tribe and NMFS every three years to assess how well the TRMP is performing at meeting its objectives.

The TRMP identifies several triggers that would lead to re-evaluation of the TRMP by the Yurok Tribe and NMFS. The re-evaluation triggers include:

1. The three-year rolling average ER on NOR coho salmon exceeds 8.1 percent;
2. The actions described in the TRMP are implemented in such a manner that causes an effect upon ESA-listed species that was not previously considered in NMFS' evaluation;
3. New information or monitoring reveals effects that may affect ESA-listed species in a way not previously considered; or
4. A new species is listed that may affect NMFS' evaluation of the TRMP.

3.0 AFFECTED ENVIRONMENT

This section describes current conditions for the resources that may be affected by the alternatives described in this draft EA. The alternatives identified above can potentially affect the physical, biological, socioeconomic, cultural, and health related resources within the project area. These resources considered in this draft EA are:

- Salmon and Steelhead (Subsection 3.1)
- Other Fish Species (Subsection 3.2)
- Pinnipeds (Subsection 3.3)
- Cultural Resources (Subsection 3.4)
- Socioeconomics (Subsection 3.5)

No other resources were identified that would potentially be impacted by the proposed action. Some resources were considered for analysis and were not included in this document, as they were not impacted by the action. Those resources include: listed plants and general vegetation; invasive species; geology and soils; water quality; water quantity, groundwater, and hydrology; air quality; aesthetics, light, and glare; agriculture; transportation; land use and ownership; tourism and recreation; public services; and human health and safety.

3.1 Salmon and Steelhead

Three salmon ESUs utilize the project area for some portion of their life cycle: SONCC coho salmon, SONCC Chinook salmon, and Upper Klamath and Trinity River Chinook salmon. Additionally, the Klamath Mountains Province distinct population segment (DPS) of steelhead is present in the project area (NMFS 2022d). Only SONCC coho salmon are listed under the ESA.

The most recent run-size estimates of steelhead, Chinook salmon, and coho salmon in the Klamath and Trinity Rivers are:

- Coho salmon:
    - Trinity River: Average run-size (estimated at the Willow Creek weir) of 14,390 fish for years 1978 through 2023 (Kier et al. 2023).
    - Klamath River:
        - Scott River: Average return of 715 fish for years 2007 through 2023.
        - Shasta River: Average return of 66 fish for years 2007 through 2023.
        - Bogus Creek: Average return of 167 fish for years 2004 through 2023.
        - IGH: Average return of 1,105 fish for years 1978 through 2023.
- Summer steelhead: Average return of summer steelhead in the Trinity River is estimated at 13,344 fish for years 1980 through 2022 (Kier et al. 2023).
- Spring-run Chinook salmon: Average return of adult spring-run fish in the Klamath and Trinity River Basins is estimated at 18,179 fish for the years 1980 through 2023 (CDFW 2023).
- Fall-run Chinook salmon: Average return of adult fall-run fish is estimated at 99,106 for years 1978 through 2024 (Figure 3) (CDFW 2025).
- Winter-run steelhead estimates are not available.

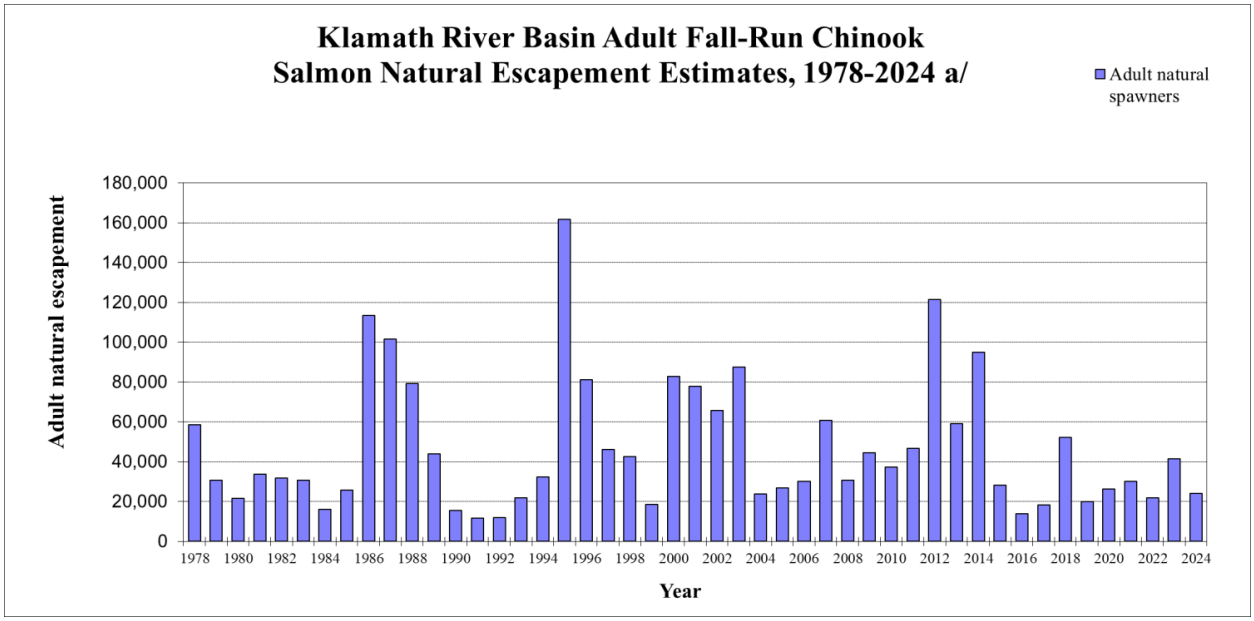

Figure 3. Klamath River Basin (Klamath and Trinity Rivers) Adult Fall-Run Chinook Salmon Natural Escapement Estimates, 1978-2023. 2023 data are preliminary (CDFW 2024).

3.1.1 Fisheries

Fisheries targeting coho salmon and retention of coho salmon are prohibited in non-tribal fisheries in California (PFMC 2021). The California Fish and Game Commission (Commission) adopted a recovery strategy for the SONCC Coho Salmon ESU, with a primary goal of returning coho salmon populations to "a level of sustained viability while protecting [their] genetic integrity" and eventually de-listing the species under the California Endangered Species Act (CDFW 2015; NMFS 2024a). Sustainable harvest by tribal, recreational, and commercial fisheries is an additional, eventual goal. Coho salmon are rarely encountered in non-tribal freshwater fisheries and are only caught incidentally in fisheries targeting Chinook salmon and steelhead in California and Oregon (NMFS 2014; Williams et al. 2016). The California Department of Fish and Wildlife manages recreational fisheries in the Klamath River basin.

Tribal fisheries in the Klamath and Trinity rivers affect coho salmon through direct harvest and in fisheries targeting other species. The Yurok tribal fishery is described above as part of the proposed action. The Hoopa Valley tribal fishery occurs in the Trinity River within the Hoopa Reservation and includes an individual tribal member fishery and a weir targeting Chinook salmon, hatchery coho salmon, and hatchery steelhead (Hoopa Valley Tribe 2021; NMFS 2022c). The Yurok Tribe and the Hoopa Valley Tribe have fishing ordinances for their tribal members, which outline their regulations for salmon fishing in the mainstem of the Trinity and Klamath Rivers (Hoopa Valley Tribe 1986; Yurok Tribe 2015). The Yurok tribal fishery occurs downstream of the Hoopa Valley tribal fishery and the fisheries do not spatially overlap (Figure 1). Harvest by species in the Yurok Tribe's fall fishery from 2011 to 2020 is shown in Table 2 below.

Table 2. Harvest by species during the Yurok tribal fall fishery 2011 – 2020 (Yurok Tribe 2023).

Year	Spring Chinook Salmon	Fall Chinook Salmon	Coho Salmon	Steelhead	Green Sturgeon	White Sturgeon
2011	79	22,789	176	62	19	0
2012	1,504	91,041	281	93	10	0
2013	1,633	59,406	1244	162	6	0
2014	326	23,167	17	90	2	0
2015	161	26,513	167	148	1	0
2016	327	4,355	106	87	3	0
2017	0	442	7	88	1	0
2018	511	12,324	86	124	8	0
2019	0	4,006	33	109	18	0
2020	205	4,247	115	130	46	1

Ocean salmon fisheries are managed under the Magnuson-Stevens Fishery Conservation and Management Act (MSA)(16 U.S.C. §§1801 et seq.), which requires that NMFS determine that fishery actions meet the requirements of the MSA and other applicable laws, including the ESA. The PFMC manages the ocean salmon fisheries through the Pacific Coast Salmon Fishery Management Plan (FMP). The FMP requires the PFMC to manage ocean salmon fisheries consistent with NMFS' ESA consultations or recovery plans to meet the immediate needs for conservation and long-term recovery of the species. Consistent with the requirements of the FMP, NMFS describes the applicable restraints implemented under the MSA and analyzed in, or derived from, existing opinions through an annual guidance letter (see for example Quan (2025)). Specific to the SONCC Coho Salmon ESU, NMFS evaluated the impact of the ocean salmon fisheries in a biological opinion completed by NMFS in 2022. The biological opinion considered the impacts of a PFMC harvest framework establishing maximum limits on the allowable exploitation rate (ER) for SONCC coho salmon (NMFS 2022b). The ER limits are 16 percent for the Trinity River populations and 15 percent for all other populations of the SONCC Coho Salmon ESU and these limits account for harvest in salmon fisheries in the ocean and in freshwater. In assessing the impact of the freshwater fisheries, NMFS (2022b) used the same harvest information provided in the Yurok TRMP. Thus, the impact of the TRMP fisheries are accounted for in the PFMC harvest framework which limits overall impacts on the SONCC Coho Salmon ESU. NMFS determined that this harvest framework, including the ER limits, would not jeopardize the continued existence of the SONCC Coho Salmon ESU.

In 2021, a PFMC workgroup completed a risk assessment (RA) for fisheries affecting SONCC coho salmon (PFMC 2021). The RA evaluated the risk to the SONCC Coho Salmon ESU from harvest in marine and freshwater environments. The RA specifically modeled the effects of fixed ERs on the short- and long-term risk of falling below critical NOR abundance thresholds (Figure 4). This information allows us to assess the relative risk to SONCC coho salmon populations

from the fisheries proposed in the TRMP. As described in the RA, extinction risk of several SONCC coho salmon populations is high, even in the absence of all ocean and freshwater fisheries, due to low abundance and productivity.

Table 3. ERs for SONCC coho salmon caught in ocean, tribal, and freshwater recreational fisheries (NMFS 2022d).

Year	Ocean fisheries	Yurok Tribe fisheries	Hoopa Valley Tribe fisheries	Klamath River Recreational fisheries	Trinity River Recreational fisheries	Total ER
1997	1.6%	1.9%	5.2%	0.0%	0.0%	8.7%
1998	11.5%	2.5%	4.5%	0.0%	0.0%	18.5%
1999	10.3%	6.4%	5.5%	0.1%	0.0%	22.3%
2000	2.0%	4.4%	5.0%	0.2%	0.0%	11.7%
2001	2.4%	12.9%	2.8%	0.3%	0.0%	18.4%
2002	5.2%	11.0%	3.6%	0.9%	0.0%	20.7%
2003	8.1%	1.5%	0.4%	0.1%	0.0%	10.1%
2004	7.9%	4.4%	0.9%	0.1%	0.0%	13.3%
2005	5.3%	4.5%	0.7%	0.0%	0.0%	10.5%
2006	5.6%	6.7%	1.9%	0.0%	0.0%	14.2%
2007	10.1%	2.4%	1.0%	0.0%	0.0%	13.5%
2008	1.1%	9.8%	4.2%	0.4%	0.0%	15.6%
2009	1.5%	7.9%	4.1%	1.0%	0.0%	14.5%
2010	1.7%	6.7%	6.4%	0.5%	0.0%	15.3%
2011	3.1%	6.1%	1.6%	0.6%	0.0%	11.4%
2012	10.1%	5.1%	0.3%	0.6%	0.0%	16.1%
2013	10.6%	10.1%	2.6%	0.4%	0.0%	23.7%
2014	4.3%	0.8%	5.0%	2.7%	0.0%	12.8%
2015	11.0%	8.4%	5.5%	0.3%	0.0%	25.3%
2016	4.8%	5.4%	1.6%	0.0%	0.0%	11.9%
2017	3.3%	0.3%	0.0%	0.0%	0.0%	3.6%
2018*	3.0%	6.7%	37.9%	0.0%	0.0%	47.7%
2019	3.3%	3.9%	8.0%	0.0%	0.0%	15.2%

* The 2018 ER is considered an outlier due to high uncertainty in abundance estimates (Hoopa Valley Tribe 2021; PFMC 2021).

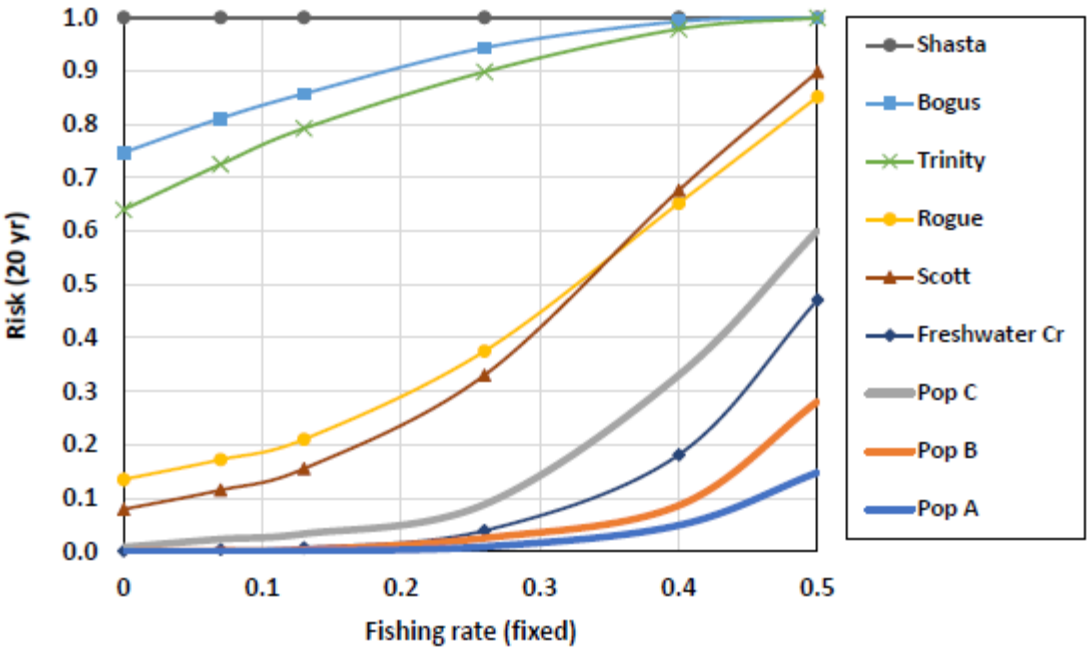

Figure 4. Modeled effects of fixed ERs on the risk of falling below critical wild population abundance thresholds (PFMC 2021).

3.1.2 Habitat

Populations of salmon and steelhead in the Klamath and Trinity Rivers have been severely impacted due to a variety of land use and anthropogenic activities in the region. Mining, timber harvesting, stream modification, hatchery effects, agriculture, road construction, stormwater runoff, recreational land use, and some residential development have all impacted these populations (NMFS 2014; 2024a).

Spawning habitat and rearing habitat have been particularly degraded over time due to disconnection of the floodplain, lack of large woody debris inputs, poor riparian conditions, sediment accretion, and the number of deep pools in the river has decreased. Sedimentation, channelization, and channel confinement have also increased within the Klamath River, while flows are often too low to create optimal water temperatures for salmonids (U.S. Department of the Interior 2000; NMFS 2014; 2024a). Coupled with droughts, anthropogenic activities have also contributed to unsuitably high water temperatures that can be detrimental to salmonids across many life stages (NMFS 2016; 2024a). Poor water quality and changes in hydrology in the mainstem Klamath River has also been shown to increase disease incidence and mortality in salmonids (NMFS 2014; 2024a).

The construction of four dams between 1912 and 1962 (Copco 1, Copco 2, JC Boyle, and Iron Gate dams) severely impacted the natural flow regime of the Klamath River Basin (NMFS 2014; Hamilton et al. 2016). This shift in the natural hydrology of the river led to substantial degradation and blockage of salmonid habitat. However, these four dams were removed in 2024 and though there will be short-term detrimental impacts on salmon and steelhead from the removal process, the long-term result will improve salmon and steelhead habitat overall

(California Water Boards 2024; NMFS 2024a). The removal of the four dams will improve hydrologic function, water quality, and disease conditions in the Lower Klamath River and estuary. These areas are used by juvenile coho salmon from all the populations in the Klamath and Trinity Rivers. In addition, adult coho salmon returning to the Klamath River will have access to more than 31 miles of habitat in the upper basin for the first time in over 100 years (NMFS 2024a).

In marine and freshwater areas, development will continue to be encouraged away from ecologically important and sensitive nearshore areas and estuaries, and reducing pollution is a priority. Preserving the natural functions of the ecosystem and supporting sustainable economic growth will encourage overall improvement. Federal agencies and organizations are expected to continue to support habitat protection, and inter-agency restoration initiatives like the Trinity River Restoration Program, the Integrated Fisheries Restoration and Monitoring Plan, the Joint Chief's Landscape Restoration Partnership, and the Western Klamath Restoration Partnership will make those efforts even more efficient (NMFS 2024a). Local community efforts, such as smaller community habitat restoration and protection efforts, will also help protect sensitive areas in the Klamath and Trinity River watersheds (NMFS 2024a).

Additional rehabilitation of habitat across the watershed, tributaries, and estuary, including culvert removal, installation of instream structures, riparian planting, gravel bar reshaping, beaver dam analog installation, fire and land management projects, and more have all been completed since 2016 (NMFS 2024a). Additionally, processes for funding restoration projects in the Klamath Basin have been streamlined to make restoration more efficient and optimized (NMFS 2024a). In the Trinity Basin, approximately 70 percent of the land is owned by the public, either the U.S. Forest Service or Bureau of Land Management (EPA 2001). The Forest Service and Bureau of Land Management have reduced timber harvest, building of roads, and significantly changed their land management policies over the last 20 years by implementing the Forest Service's Northwest Forest Plan and developing a restorative approach to watershed management. In addition, a number of habitat restoration projects have been completed in key tributaries of the Trinity River, and a flow release project has been implemented to better mimic a natural hydrograph (Trinity River Restoration Program 2023; NMFS 2024a).

3.1.3 Hatcheries

No coho salmon hatcheries are currently present in the project area. Historically, upstream from the project area, artificial propagation in the Klamath River Basin began as early as 1910 with the Klamathon Egg Collecting Station on the Klamath River (Leitritz 1970). Currently, with the removal of the four Klamath River dams and the associated Iron Gate Hatchery, there are three hatchery programs that operate in the greater Klamath/Trinity River Basin: Fall Creek Hatchery (where Iron Gate Hatchery operations have been relocated to), Hoopa Valley Tribal Hatchery, and Trinity River Hatchery.

Coho salmon production that previously occurred at Iron Gate Hatchery (IGH) has been relocated to Fall Creek Hatchery (FCH) for eight years following removal of Iron Gate Dam (Yurok Tribe 2023). The primary purpose of the FCH program is to protect the genetic resources

of the Upper Klamath River SONCC coho salmon population and reduce extinction risks prior to and after the removal of the four Klamath River dams. Secondarily, the program is also intended to provide adult coho salmon that could disperse into newly accessible habitat (~76 miles) made available from dam removal (NMFS 2023).

The Hoopa Valley Tribal Hatchery (HVTH) was established to encourage reseeding of coho salmon in tributaries of the Trinity River within the Hoopa Valley Tribal Reservation (NMFS 2022a).

The Trinity River hatchery (TRH) was established in 1958, and has continued at the permanent TRH facility since 1963 to mitigate for 109 miles of habitat lost above Lewiston Dam. The initial broodstock, used for propagating coho salmon, originated from native fish stocks in the Eel, Cascade, Alsea, and Noyo rivers. Hatchery fish released from the TRH are considered part of the SONCC Coho Salmon ESU (California HSRG 2012; U.S. Department of the Interior and the California Department of Fish and Game 2012; U.S. Department of the Interior and CDFW 2017; NMFS 2024a).

Hatcheries can pose a significant threat to salmon. Hatchery fish can affect NOR salmon populations through a variety of ecological mechanisms, such as increased competition (Nickelson et al. 1986; NRC 1996; McMichael et al. 1997), predation (Sholes and Hallock 1979; HSRG 2004), genetic dilution (NRC 1996), and disease transmission (Goede 1986; NRC 1996; Coutant 1998; Moffitt et al. 1998). However, hatcheries can also provide benefits to salmonid populations by reducing demographic risks and preserving genetic traits for populations at low abundance, or in areas where habitat is significantly degraded (U.S. Department of the Interior and CDFW 2017; PFMC 2021; NMFS 2024a). In addition, hatchery fish can help to provide harvest opportunities where existing populations would not otherwise support harvest.

3.2 Other Fish Species

The Yurok Tribal fishery may incidentally encounter other native fish species that are present in the project area (Table 4). Harvest of green and white sturgeon is low, and is listed in Table 2. Additionally, other fish species may be prey, predators, or competitors for food and space with, or for, the species proposed for harvest in the Klamath River and Trinity Rivers (Table 4). The prey, predator, and competitive behaviors depend on the relative life stages and the spatial and temporal overlap of salmon with other fish species. Only qualitative information is available regarding these interactions between salmon and other fish species.

Table 4. Status of other native fish species in the project area.

Species	Federal/State Listing Status
Pacific Lamprey *Entosphenus tridentatus*	CDFW – Moderate Concern
Western River Lamprey *Lampetra ayresii*	CDFW – Moderate Concern
Klamath River Lamprey *Entosphenus similis*	CDFW – Moderate Concern
Eulachon *Thaleichthys pacificus*	Southern DPS – Federally listed as threatened CDFW – Species of Special Concern
Green Sturgeon *Acipenser medirostris*	Northern DPS – Not listed Southern DPS – Federally listed as threatened CDFW – Species of Special High Concern
White Sturgeon *Acipenser transmontanus*	CDFW – High Concern
Tidewater Goby *Eucyclogobius newberryi*	Federally listed as endangered
Coastal Cutthroat Trout (*Oncorhynchus clarkii clarkii*)	CDFW – Moderate Concern
Rainbow Trout *Oncorhynchus mykiss*	CDFW – High Concern for Klamath Mountains Province Steelhead

Similar to salmon and steelhead species, for other native species the current aquatic habitat conditions are degraded. Water management, resource extraction, and fire management actions have disturbed aquatic fish habitat through decreased large wood sources and in-channel large wood; altered riparian corridors; altered hydrologic pathways; decreased soil productivity; increased surface erosion and landslides, and the quantities of sediment entering and transporting down river (Graham Matthews & Associates 2014). Crop cultivation and livestock grazing contribute to significant consumptive use of water in the Scott and Shasta River sub-basins reducing the quantity of flow and altering the timing of water availability and potentially altering stream temperature and introducing pollutants. However, there are also current watershed and aquatic habitat rehabilitation efforts, including culvert removal, installation of instream structures, riparian planting, gravel bar reshaping, beaver dam analog installation, fire and land management projects, and more that have been completed since 2016 to improve fish habitat (NMFS 2024a).

3.3 Pinnipeds

Several pinniped species occur in the project area, primarily in the estuary of the Klamath River. Of the pinniped species in the project area, those that are known to interact with salmon fisheries are California sea lions (*Zalophus californianus*) and harbor seals (*Phoca vitulina*). Both species

will feed on salmon when available, and have been documented preying on hooked salmon in commercial and recreational fisheries (Weise and Harvey 1999; Weise and Harvey 2005). Steller sea lions (*Eumetopias jubatus*) also periodically enter the project area and may also interact with the fishery, but there is currently little available information on such interactions.

The California sea lion U.S. stock population is considered to be within the range of its optimum sustainable population and the California harbor seal stock has increased since the 1980s (Carretta et al. 2023). Steller sea lions are from the eastern Steller sea lion stock population which has steadily increased over a 30 year period, and is likely within its optimum sustainable population (Young et al. 2023). None of these stocks are listed under the ESA or considered depleted under the Marine Mammal Protection Act (MMPA).

About 400-500 harbor seals haul out year-round in the Klamath River, while small numbers (fewer than 20) California sea lions and Steller sea lions commonly enter the river in the spring and fall overlapping returning adult runs of salmonids (fall Chinook salmon, coho salmon, spring Chinook salmon, and steelhead) (Scordino 2010). The Yurok Tribal Fisheries Program investigated pinniped predation of fall-run Chinook salmon in the lower Klamath River from 1997 to 1999. In this study, California sea lions were the primary pinniped predator, accounting for more than 85 percent of the salmonid predation events each year, followed by harbor seals and Steller sea lions, respectively (Hillemeier 1999; Scordino 2010).

Similar to fish species, pinnipeds require prey and good quality habitat. Pinniped prey availability is likely to benefit from consistent salmon and steelhead harvest levels coupled with improved harvest production practices, as well as watershed and aquatic habitat rehabilitation and water management actions. Watershed and aquatic habitat rehabilitation and improved water management actions may also help mitigate the adverse effects from resource extraction and detrimental fire actions that have degraded the estuarine habitat of the area that pinnipeds utilize.

3.4 Cultural Resources

Salmon are a core symbol of tribal identity, individual identity, and the ability of the tribes to endure (Grayum 2013). The survival and well-being of salmon is seen as inextricably linked to the survival and well-being of American Indians and the cultures of the tribes.

The U.S. government has a trust or special relationship with American Indian tribes. The unique and distinctive political relationship between the U.S. and Indian tribes is defined by numerous legal vehicles and differentiates tribes from other entities that deal with, or are affected by the Federal government. Executive Order 13175, Consultation and Coordination with Indian Tribal Governments, states that the U.S. has recognized Indian tribes as domestic dependent nations under its protection. Secretarial Order 3206 (American Indian Tribal Rights, Federal Tribal Trust Responsibilities, and the ESA) clarifies the responsibilities of the Departments of Commerce and Interior when actions taken under the ESA affect Indian lands, tribal trust resources, or American Indian tribal rights.

The Yurok and Hoopa (Hupa) native peoples occupied the Klamath and Trinity River watersheds before Euro-American settlement. The Klamath and Trinity Rivers are, and have always been, essential to the livelihood of the tribes. Steelhead and salmon fishing has been a focus of tribal economies, lifestyles, and identities for thousands of years. These activities continue to be central to tribal culture for subsistence and ceremonial purposes.

3.5 Socioeconomics

If the Tribal Council determines that the Tribe's fall Chinook salmon allocation is large enough, they allow commercial fishing for fall Chinook salmon within the estuary, although there has not been a viable commercial fishery since 2015 due to low abundance. A commercial fishery was held during 2019, however, it was a failure due to the fall Chinook salmon run-size being substantially less than what was projected and catch was very low. Table 5 summarizes harvest and economic information from Yurok commercial fisheries from 2007 to 2020.

Table 5. Harvest of Chinook salmon, ex-vessel value, and economic impact of the Yurok Tribe's commercial fishery during 2007 -2020 (Yurok Tribe 2023).

Year	Chinook Salmon Sold	Ex-Vessel Value	Economic Impact*
2007	23,413	$810,930	$3,160,755
2008	12,527	$956,051	$1,691,145
2009	14,795	$652,093	$1,997,325
2010	14,388	$889,673	$1,942,380
2011	14,511	$876,256	$1,958,985
2012	81,642	$3,119,595	$11,021,670
2013	52,386	$4,090,064	$7,072,110
2014	9,205	$564,873	$1,242,675
2015	17,264	$910,231	$2,330,640
2016	N/A	N/A	N/A
2017	N/A	N/A	N/A
2018	N/A	N/A	N/A
2019	2,129	$105,231	$287,415
2020	N/A	N/A	N/A
Average 2007-2015	$26,681	1,429,974	$3,601,965

*Estimated economic impact using methods devised for California salmon troll fishery - $135/fish (http://fishbio.com/field-notes/the-fish-report/the-economics-of-salmon). Economic impact includes factors like sales, income, jobs, and value added (NMFS 2024b).

4.0 ENVIRONMENTAL CONSEQUENCES

In Section 4, Environmental Consequences, the potential direct and indirect effects of the two alternatives are evaluated on the biological, physical, and socioeconomic resources described in Section 3 (Affected Environment).

Under Alternative 1, NMFS would not issue a determination that the TRMP meets the requirements of the Tribal 4(d) Rule, and the activities conducted under the TRMP would not be exempted from Section 9 take prohibitions. Alternative 1 serves as a baseline for comparison purposes to the proposed action (Alternative 2). Under Alternative 1, we assume that the harvest activities would continue at existing levels and the effects of the existing activities would remain the same as the current conditions.

4.1 Alternative 1 – No Action Alternative

4.1.1 Salmon and Steelhead

Under Alternative 1, we assume harvest would continue at existing levels and the effects of the existing fisheries would remain the same as the current conditions (described in the Affected Environment section, 3.1.1 above). The relative impacts on salmon and steelhead would remain the same as the status quo on average. Yurok tribal fishing for Chinook salmon, coho salmon, and steelhead would still occur at similar rates to those under current conditions.

The extinction risk of SONCC coho salmon is high even in the absence of fisheries because of low abundance and productivity. The ER equivalent of the proposed action is 5.7 percent which equates to a low increase (<5 percent) in risk for SONCC coho salmon populations salmon over a 20-year period when compared to a zero-fishing scenario (Figure 4). Specific to the SONCC Coho Salmon ESU, NMFS evaluated the impact of fisheries, including the impact of the TRMP fisheries, and determined that the harvest framework described in the Affected Environment would not jeopardize the continued existence of the SONCC Coho Salmon ESU (NMFS 2022b). The effects of continuing the existing harvest framework are expected to be minor, therefore, the impacts of Alternative 1 on salmon and steelhead would not be significant.

4.1.2 Other Fish Species

Under Alternative 1, the level of competition for space and food and fishery encounters among freshwater fish species would be maintained relative to current conditions during the short and long-term. Under this alternative, Yurok tribal fishing would still occur at similar rates to those under current conditions. As shown in Table 2, sturgeon are rarely harvested in the fishery, lamprey primarily enter the project area later in the fishery season when fishing effort has decreased substantially, and eulachon encounters in the basin are rare (Yurok Tribe 2023). Tidewater goby would also be unlikely to be encountered in the majority of the project area since they primarily inhabit lagoons, marshes, and estuarine environments (79 FR 14340, March 13, 2014). These spatial and temporal divergences minimize both incidental fishery encounters as well as predator, prey, and competitive interactions, though only qualitative information is available regarding these interactions. The fishery would continue to operate seasonally, with effort decreasing substantially by the fall. The relative impact on other fish species would remain minor; therefore, the impacts of Alternative 1 on other fish species would not be significant.

4.1.3 Pinnipeds

Under Alternative 1, the level of fish harvest would continue at existing levels. Where quantitative information exists, fewer than 20 out of an estimated 400-500 sea lions, commonly enter the project area. California sea lions were the most commonly observed pinniped by the Yurok tribal fisheries program, followed by harbor seals, and Steller sea lions (Hillemeier 1999; Scordino 2010). Since pinniped occurrence within the project area is uncommon and pinnipeds, especially California sea lions, are opportunistic feeders, negative impacts from prey removal are likely to remain minor. Lastly, the fishery would continue to operate seasonally, with effort decreasing substantially in the Estuary management area that pinnipeds utilize by October. The relative impacts on any pinniped species, either from prey removal or vessel or gear interactions, would remain low. Therefore, the impacts of Alternative 1 on pinnipeds would not be significant.

4.1.4 Cultural Resources

Under Alternative 1, all activities would continue as described for the Affected Environment. The existence of the status quo fisheries contribute to the cultural integrity and well-being of the tribes. The maintenance of natural resource practices for the Yurok Tribe would not result in significant effects on tribal cultural resources. Therefore, the impacts of Alternative 1 on Cultural Resources would not be significant.

4.1.5 Socioeconomics

Under Alternative 1, tribal fishing for Chinook salmon would occur at similar rates to those under current conditions. Since commercial Chinook salmon harvest would continue at existing levels, the socioeconomic impacts would remain similar to the status quo (described in Section 3.5) on average. Therefore, the impacts of Alternative 1 on socioeconomics would not be significant.

4.2 Alternative 2 (Preferred Alternative) - Proposed Action

4.2.1 Salmon and Steelhead

Under Alternative 2, Yurok Tribal fishing for Chinook salmon, coho salmon, and steelhead would still occur (Table 3). The relative impacts on salmon and steelhead would remain near the same as the status quo (described in the Affected Environment section, 3.1.1 above) on average. The harvest of coho salmon in the Yurok tribal fisheries would be exempted from Section 9 take prohibitions under the ESA. In the Yurok Tribe's fisheries, impacts on NOR coho salmon are expected to align with recent historical (2007-2019) ERs. Under this alternative, the Tribe would continue to manage the fishery in a manner that will result in an average annual ER of 5.7 percent on NOR coho salmon over a roughly 12-year time period. Additionally, the Tribe would ensure that the impacts on coho salmon do not exceed a three-year rolling average of 8.1 percent. The Tribe would evaluate the rolling average in its annual reports to NMFS, providing an additional check on harvest rates. The TRMP would be evaluated annually by the Tribe, and every three years by NMFS and the Tribe, to assess how well the TRMP is performing at meeting its objectives. The information the Tribe will report to NMFS, as described in the

TRMP, will inform the understanding of the status of SONCC coho and the operation of the fisheries in the future.

The extinction risk of SONCC coho salmon is high even in the absence of fisheries because of low abundance and productivity. The ER equivalent of the proposed action is 5.7 percent which equates to a low increase (<5 percent) in risk for SONCC coho salmon populations salmon over a 20-year period when compared to a zero-fishing scenario (Figure 4). Additionally, specific to the SONCC Coho Salmon ESU, NMFS evaluated the impact of fisheries, including the impact of the TRMP fisheries, and determined that the harvest framework described in the Affected Environment would not jeopardize the continued existence of the SONCC Coho Salmon ESU (NMFS 2022b). The effects of this alternative on SONCC coho are thus similar to those of Alternative 1, with the 8.1% maximum three-year rolling average and the reporting requirements in the TRMP providing additional assurance that the impacts of this harvest framework are minor on an annual basis as well as over the longer term. Therefore, the impacts of Alternative 2 on salmon and steelhead would not be significant.

4.2.2 Other Fish Species

Under Alternative 2, the level of competition for space and food and encounters with fishing gear among freshwater species would be maintained relative to current conditions (described in Section 3.2) during the short and long-term. This alternative would not be expected to have significant adverse effects on other fish species compared to current conditions, as Yurok tribal fishing would still occur at similar rates to those under current conditions. As shown in Table 2, sturgeon are rarely harvested in the fishery, lamprey primarily enter the project area later in the fishery season when fishing effort has decreased substantially, and eulachon encounters in the basin are rare (Yurok Tribe 2023). Tidewater goby would also be unlikely to be encountered in the majority of the project area since they primarily inhabit lagoons, marshes, and estuarine environments (79 FR 14340, March 13, 2014). These spatial and temporal divergences minimize both incidental fishery encounters as well as predator, prey, and competitive interactions, though only qualitative information is available regarding these interactions. The fishery would continue to operate seasonally, with effort decreasing substantially by the fall. The relative impact on other fish species would remain low. Therefore, the impacts of Alternative 2 on other fish species would not be significant.

4.2.3 Pinnipeds

Under Alternative 2, the current level of fish harvest would still occur. Where quantitative information exists, fewer than 20 out of an estimated 400-500 sea lions, commonly enter the project area. California sea lions were the most commonly observed pinniped by the Yurok tribal fisheries program, followed by harbor seals, and Steller sea lions (Hillemeier 1999; Scordino 2010). Since pinniped occurrence within the project area is uncommon and pinnipeds, especially California sea lions, are opportunistic feeders, negative impacts from prey removal are likely to remain minor. Lastly, the fishery would continue to operate seasonally, with effort decreasing substantially in the Estuary management area that pinnipeds utilize by October. The relative impacts on any pinniped species, either from prey removal or vessel or gear interactions, would

remain low, near the same as the status quo (described in Section 3.3). Therefore, the impacts of Alternative 2 on pinnipeds would not be significant.

4.2.4 Cultural Resources

Under Alternative 2, the Yurok Tribe would harvest salmon and steelhead in a manner similar to current conditions. Other tribal communities would have unchanged opportunities to fish for returning Klamath and Trinity River coho salmon. Since Alternative 2 represents continued harvest opportunity for the Yurok Tribe similar to current conditions and, in which, other tribal fisheries also occur, and would not affect other tribal fisheries, it would not result in significant adverse impacts.

The existence of the status quo fisheries contribute to the cultural integrity and well-being of the tribes. The maintenance of natural resource practices for the Yurok Tribe would not result in significant effects on tribal cultural resources; therefore, the impacts of Alternative 2 on cultural resources would not be significant.

4.2.5 Socioeconomics

Under Alternative 2, Yurok tribal fishing for Chinook salmon would occur at similar rates to those under current conditions. Since commercial Chinook salmon harvest in the Yurok tribal fishery would continue at existing levels, the socioeconomic impacts would remain similar to the status quo (described in Section 3.5) on average. The magnitude of economic benefits would continue to vary year-to-year, but overall changes related to the implementation of Alternative 2 are not likely to be significant. Therefore, the impacts of Alternative 2 on socioeconomics would not be significant.

5.0 LIST OF PREPARERS

Table 6. List of preparers and their roles in preparing the EA.

Name	Organization	Title	Role in Preparing the EA
Anthony Siniscal	NMFS West Coast Region, Sustainable Fisheries Division	Natural Resource Management Specialist	Project lead
Kayla Boyes	Contractor with Genwest in support of NMFS	Fish Biologist	Science writing and NEPA analysis
Jeff Abrams	NMFS West Coast Region, California Coastal Office	Fisheries Biologist	Reviewer
Susan Bishop	NMFS West Coast Region, Sustainable Fisheries Division	Branch Chief	Reviewer
Matt Blazek	NMFS West Coast Region, Regional Administrator's Office	NEPA Coordinator	Reviewer

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