

FP25–06 Executive Summary

General Description	Fisheries Proposal FP25-06 requests to remove the per-permit harvest limit for salmon in the road-accessible zone of Kodiak Island, so that federally qualified subsistence users are not required to attain an additional harvest permit to harvest more salmon. – <i>Submitted by the Kodiak/Aleutians Subsistence Regional Advisory Council</i>
Proposed Regulation	<p>§ ____. 50 CFR 100.27(e)(9)(v) <i>There is no annual harvest limit for salmon in the remainder of the Kodiak Area not described in paragraph (e)(9)(iii)(A) of this section. The annual limit for a subsistence salmon fishing permit holder is as follows:</i></p> <p style="padding-left: 40px;"><i>(A) In the road-accessible Zone (Northeastern Kodiak Island), east of the line from Crag Point south to the westernmost point of Saltery Cove, including the inland waters of Spruce, Woody and Long Islands, and the Federal marine waters of and around Womens Bay, 25 salmon for the permit holder plus an additional 25 salmon for each member of the same household whose names are listed on the permit: an additional permit may be obtained upon request.</i></p> <p style="padding-left: 40px;"><i>(B) In the remainder of the Kodiak Area not described in paragraphs (e)(9)(iii)(A) and (e)(9)(v)(A) of this section, there is no annual harvest limit for a subsistence salmon fishing permit holder.</i></p>
OSM Conclusion	Oppose
Kodiak/Aleutians Subsistence Regional Advisory Council Recommendation	Oppose
Interagency Staff Committee Comments	The Interagency Staff Committee found the staff analysis to be a thorough and accurate evaluation of the proposal and that it provides sufficient basis for the Regional Advisory Council recommendation and Federal Subsistence Board action on the proposal.
ADF&G Comments	No Comment
Written Public Comments	None

STAFF ANALYSIS
FP25-06

ISSUES

Fisheries Proposal FP25-06 was submitted by the Kodiak/Aleutians Subsistence Regional Advisory Council. It requests to remove the per-permit harvest limit for salmon in the road-accessible zone of Kodiak Island, so that federally qualified subsistence users (FQSUs) in the area are not required to attain an additional harvest permit to harvest more salmon.

DISCUSSION

The proponent states that removing the per-permit harvest limit for salmon in the road-accessible zone of Kodiak Island is needed to simplify regulations and reduce regulatory burden on FQSUs in the Kodiak Area. The proponent states that there is functionally no harvest limit for salmon in this area because current regulations allow additional permits to be issued when one harvest limit is reached. However, the proponent explains that it is unnecessary and burdensome to require FQSUs to obtain an additional permit before harvesting additional salmon.

Existing Federal Regulation

§ ____. 50 CFR 100.27(e)(9)(v) *The annual limit for a subsistence salmon fishing permit holder is as follows:*

(A) In the road-accessible Zone (Northeastern Kodiak Island), east of the line from Crag Point south to the westernmost point of Saltery Cove, including the inland waters of Spruce, Woody and Long Islands, and the Federal marine waters of and around Womens Bay, 25 salmon for the permit holder plus an additional 25 salmon for each member of the same household whose names are listed on the permit: an additional permit may be obtained upon request.

(B) In the remainder of the Kodiak Area not described in paragraphs (e)(9)(iii)(A) and (e)(9)(v)(A) of this section, there is no annual harvest limit for a subsistence salmon fishing permit holder.

Proposed Federal Regulation

§ ____. 50 CFR 100.27(e)(9)(v) ***There is no annual harvest limit for salmon in the remainder of the Kodiak Area not described in paragraph (e)(9)(iii)(A) of this section. The annual limit for a subsistence salmon fishing permit holder is as follows:***

(A) In the road-accessible Zone (Northeastern Kodiak Island), east of the line from Crag Point south to the westernmost point of Saltery Cove, including the inland waters of Spruce, Woody and Long Islands, and the Federal marine waters of and around

~~Womens Bay, 25 salmon for the permit holder plus an additional 25 salmon for each member of the same household whose names are listed on the permit; an additional permit may be obtained upon request.~~

~~(B) In the remainder of the Kodiak Area not described in paragraphs (e)(9)(iii)(A) and (e)(9)(v)(A) of this section, there is no annual harvest limit for a subsistence salmon fishing permit holder.~~

Relevant Federal Regulation

§ ____. 50 CFR 100.27(c)(2) Fishing permits and reports

(i) You may not take more fish for subsistence use than the limits set out in the permit;

(ii) You must obtain the permit prior to fishing;

* * * * *

Existing State Regulation

5 AAC 01.530. Subsistence fishing permits

(a) A subsistence fishing permit is required for taking salmon, trout, char, and herring for subsistence purposes.

(b) The annual limit for a subsistence salmon fishing permit holder is as follows:

(1) in the fresh waters of Kodiak Island, east of a line from Crag Point south to the westernmost point of Saltery Cove, including the waters of Woody and Long Islands, and the salt waters bordering this area within one mile of Kodiak Island, excluding the waters bordering Spruce Island, 25 salmon for the permit holder plus an additional 25 salmon for each member of the same household whose names are listed on the permit; an additional permit may be obtained if it can be shown that more fish are needed;

(2) in the remainder of the Kodiak Area not described in (1) of this subsection, there is no annual limit.

Existing State Sport Fish Regulation

5 AAC 64.022 Waters; seasons; bag, possession, annual, and size limits; and special provisions for the Kodiak Area.

(a) Unless otherwise specified in this section, 5 AAC 64.051, or 5 AAC 64.060, or by an emergency order issued under AS 16.05.060, the following are the bag, possession, annual,

and size limits, and special provisions for finfish and shellfish in the waters of the Kodiak Area:

(1) king salmon: may be taken from January 1 - December 31, as follows:

(A) in fresh waters:

(i) 20 inches or greater in length; bag and possession limit of two fish; annual limit of five king salmon; a harvest record is required as specified in 5 AAC 75.006;

(ii) less than 20 inches in length; bag and possession limit of 10 fish; king salmon less than 20 inches in length caught in fresh water do not count toward the annual limit;

(B) in salt waters: bag and possession limit of two fish; no size limit; no annual limit; a harvest record is not required;

(2) salmon, other than king salmon: may be taken from January 1 - December 31, as follows:

(A) 20 inches or greater in length; bag and possession limit of five fish, of which only two may be coho salmon and only two may be sockeye salmon;

(B) less than 20 inches in length; bag and possession limit of 10 fish

** * * * **

(8) in the Kodiak Road Zone, from September 16 - December 31, the bag and possession limit for coho salmon, 20 inches or greater in length, is one fish, except that in the following stocked waters the bag and possession limit for coho salmon, 20 inches or greater in length, is two fish:

Extent of Federal Public Lands/Waters

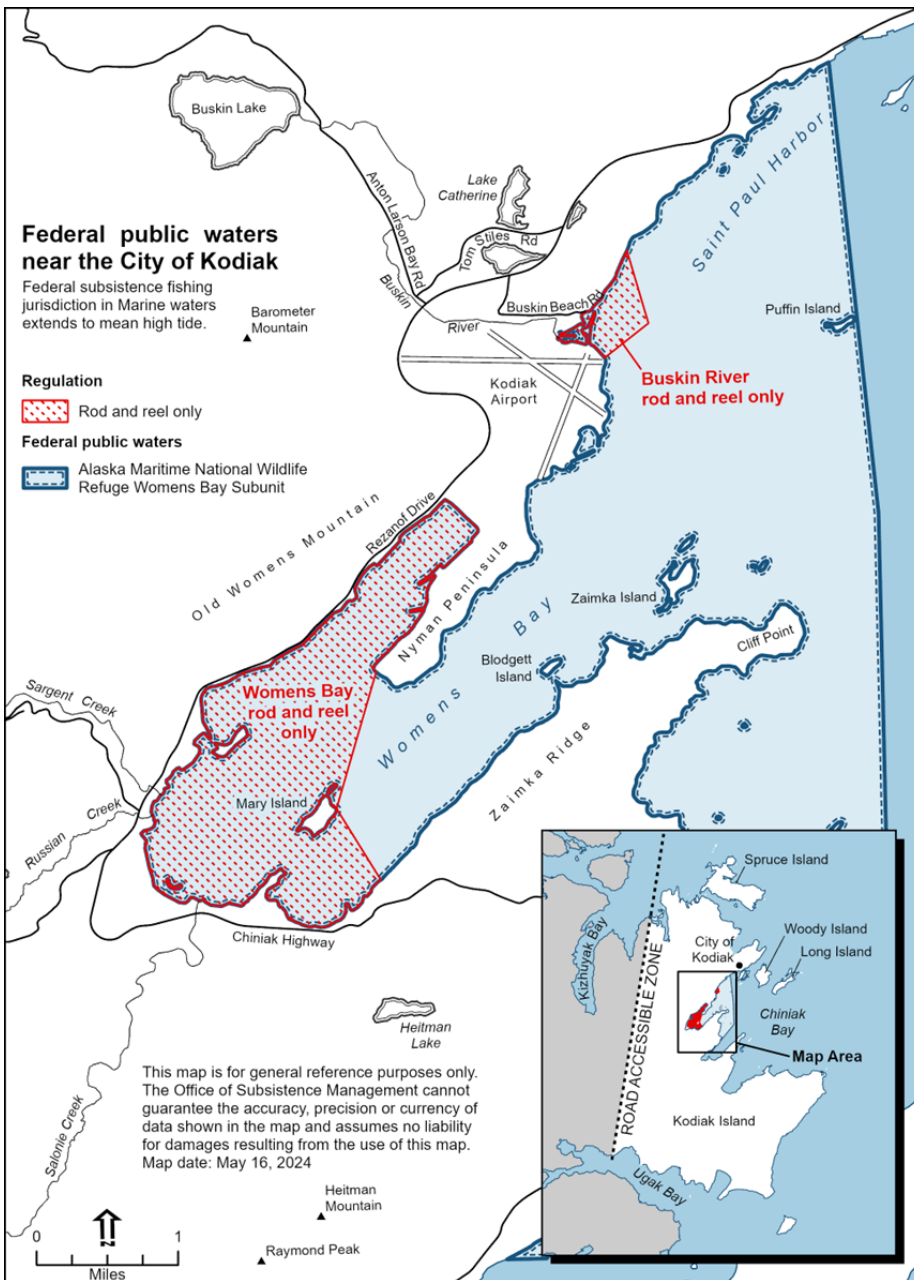
For purposes of this discussion, the phrase “Federal public waters” is defined as those waters described under 36 CFR 242.3 and 50 CFR 100.3.

The area in question is defined in § __.27(e)(9)(v)(A): The road-accessible Zone (Northeastern Kodiak Island) is defined as: east of the line from Crag Point south to the westernmost point of Saltery Cove, including the inland waters of Spruce, Woody and Long islands, and the Federal marine waters of and around Womens Bay (**Map 1**).

The primary Federal public waters fished in this area are marine waters seaward of mean high tide near the Buskin River (Witteveen and Huang 2022). Federal subsistence jurisdiction also applies to the

freshwaters of Spruce, Woody, and Long Islands. However, no Federal subsistence harvest has been reported from these locations on Federal permits because there are no appreciable salmon returns on these islands.

There are already harvest limits in regulation for the following subunit of Womens Bay and they are not affected by this proposal. Womens Bay—All waters inside a line from the tip of the Nyman Peninsula (57°43.23' North latitude, 152°31.51' West longitude), to the northeastern tip of Mary's Island (57°42.40' North latitude, 152°32.00' West longitude), to the southeastern shore of Womens Bay at 57°41.95' North latitude, 152°31.50' West longitude (**Map 1**).



Map 1. Federal public marine waters of the Buskin River and Womens Bay near Kodiak City.

Customary and Traditional Use Determinations

Residents of Kodiak Island Borough, except those residing on the Kodiak Coast Guard Base, have a customary and traditional use determination for salmon in all portions of the Kodiak Area except the Mainland District.

Regulatory History

In 1992, the Federal Subsistence Management Program announced regulations governing the harvest of fish for subsistence uses in waters qualifying as “public lands” under ANILCA (57 FR 22940). These regulations incorporated many provisions from State subsistence fishing regulations, including the Buskin River closed waters. The Buskin River closed waters were defined as all waters inside of a line running from a marker on the bluff north of the mouth of the Buskin River at approximately 57°45.80' North latitude, 152°28.38' West longitude, to a point offshore at 57°45.35' North latitude, 152°28.15' West longitude, to a marker located onshore south of the river mouth at approximately 57°45.15' North latitude, 152°28.65' West longitude (**Map 1**).

Prior to 2011, the current annual limit for salmon in the road-accessible zone applied to the entire Kodiak Area. In 2011, the annual harvest limit was removed for all areas except those along the Kodiak Road Zone (FP11-13). This change was implemented after the Alaska Department and Fish and Game (ADF&G) made similar revisions to State subsistence harvest limits outside the road-accessible zone. Removing the Federal subsistence harvest limit in this area was expected to improve harvest reporting accuracy and simplify enforcement of Federal and State regulations, but harvest limits remained in place for the more intensively used and managed road-accessible zone (OSM 2011).

At the direction of the Federal Subsistence Board (Board), the Office of Subsistence Management (OSM) conducted a review (FCR21-16) of the Buskin River closed waters during the 2021-2023 fisheries regulatory cycle. The Kodiak/Aleutians Council recommended, and the Board agreed, that closure review FCR21-16 be deferred to the following fisheries regulatory cycle to gather more public input. The Buskin closure issue was revisited during the 2023-2025 fisheries regulatory cycle along with proposal FP23-06b, which sought to rescind the closure, limit harvest methods to rod and reel only, and adopt current State sport fishing harvest limits in this area. The Kodiak/Aleutians Council recommended that the Buskin River closed waters be rescinded and a rod and reel fishery be implemented, but they did not recommend adopting State sport fishing harvest limits as the Council felt these limits would unnecessarily restrict the efficiency of subsistence harvesters. The Board adopted proposal FP23-06b, as modified by the Kodiak/Aleutians Council, and took no action on deferred closure review FCR21-16.

Current Events Involving the Species

Federal emergency special actions and State emergency orders were implemented for Womens Bay in recent history due to poor returns of salmon to the Buskin River drainage. In 2019, Emergency Special Action 9-SS-02-19 closed all Federal public waters at the mouth of the Buskin River to the take of Coho salmon. In 2021, Emergency Special Action 9-RS-01-21 closed the Federal public waters of

Womens Bay to the take of Sockeye salmon. In 2022, Emergency Special Action 9-SS-01-22 closed Womens Bay to the take of Sockeye salmon but was later rescinded under Emergency Special Action 9-RS-02-22 because minimum escapement was met. In 2023, Emergency Special Action 9-RS-02-23 closed all Federal public waters at the mouth of the Buskin River to the take of Sockeye salmon. State emergency orders also closed Womens Bay to sport and subsistence fishing in all of the above situations.

Biological Background

The primary salmon runs affected by this proposal are those returning to the Buskin River watershed. Sockeye salmon returning to the Buskin River are counted each year using a weir that operates from May through July. Most Sockeye salmon returning to the Buskin River watershed pass through a weir located at the outlet of Buskin Lake, while a smaller portion returns to Lake Louise which is lower in the watershed. Buskin Lake has a Sockeye salmon escapement goal of 5,000 to 8,000 fish (Anderson et al. 2019). The Buskin River has experienced both very strong and relatively weak Sockeye and Coho salmon runs over the past twelve years (2012 – 2023; **Figure 1**). One of the highest Sockeye salmon counts ever recorded occurred in 2013 (16,178 fish). However, Sockeye salmon returns did not meet escapement goals during two out of the five years of the most recent reporting period (2021 and 2023). The 2023 escapement of 1,761 Sockeye salmon was the lowest return in the past 12-year period (2012-2023).

The Buskin River supports one of the most historically productive Coho salmon stocks in the Kodiak Management Area (Polum et al. 2019). Coho salmon typically start returning in early to mid-August and continue into the fall. The Buskin River has a Coho salmon escapement goal of 4,700-9,600 fish and is monitored by a weir about a mile above the river mouth. From 2012 to 2023, weir counts of Coho salmon ranged from a high of 8,413 fish in 2014, to a low of 630 fish in 2020 (**Figure 1**). The Coho numbers shown for 2016, 2020, 2022, and 2023 in **Figure 1** are considered incomplete, minimum counts because the weir was removed before the end of the run during these years. The Buskin River also supports a Pink salmon run, as well as a small number of Chum salmon each year.

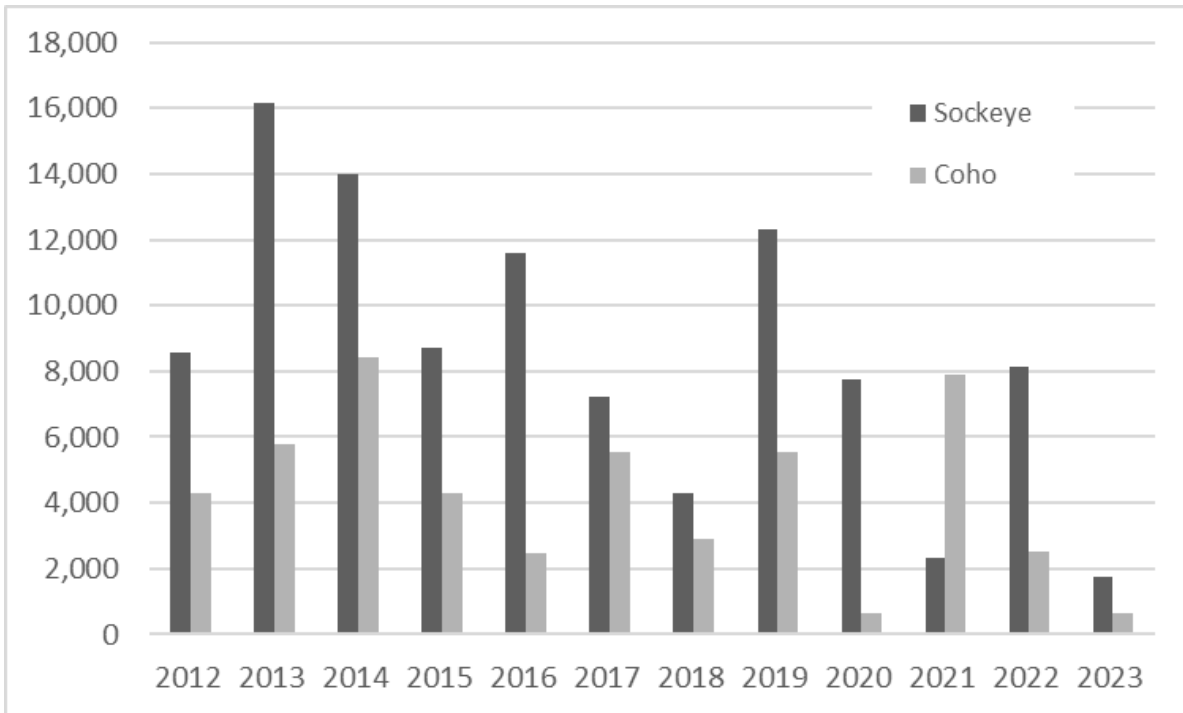


Figure 1. Annual weir counts of Sockeye and Coho salmon in the Buskin River from 2012 to 2023 (ADF&G 2024b). Coho Salmon counts in 2016, 2020, 2022, and 2023 are incomplete.

Cultural Knowledge and Traditional Practices

Community Profile

The subsistence practices of the rural residents of the Kodiak Area reflect the cultural traditions of the Alutiiq/Sugpiaq; the Koniag/Qikertarmiut; and Eastern European, Scandinavian, Asian, and American settlers. Indigenous populations have lived in the area for at least 7000 years, with subsistence economies largely based on the harvesting of maritime resources (Clark 1998). Key among these subsistence resources have been marine animals, shellfish, near-shore fisheries, sea or littoral birds and their eggs, and salmon harvested primarily from spawning areas (Clark 1998). Salmon remain one of the primary subsistence resources harvested by rural residents in this region (Wolfe and Walker 1987, Fall and Walker 1993, Marchioni et al. 2016).

Historically, some of the most-utilized harvest areas for subsistence salmon in the Kodiak archipelago have been the Buskin and Pasagshak Rivers located in the Kodiak Road Zone on the northern end of Kodiak Island and the southeast side of Afognak Island at Litnik (Anderson et al. 2016; Brown et al. 2021). Residents of Kodiak City (5,384), Mill Bay CDP (4,190), Kodiak Station (1,483), Women’s Bay (783), and Chiniak (55) are among those who can most readily access the road-accessible harvest areas (ADLWD 2024). All these communities, except residents of the U.S. Coast Guard Base located within Kodiak Station, have a customary & traditional use determination for salmon in the Kodiak Area except the Mainland District.

Harvest Practices

Residents throughout the Kodiak Area currently harvest salmon using subsistence gillnets and seines, rod and reel, and removal of salmon from commercial catch for home use (Marchioni et al. 2016). Harvested salmon are typically dried, smoked, canned, or frozen to preserve the resource for use out of season, and are regularly shared throughout the community (Marchioni et al. 2016). These subsistence practices form a key basis of cultural identity, family life, and community well-being in the area (Fall 1999). Recent estimates show that approximately 75% of the salmon harvested for subsistence in the Kodiak Island Borough are harvested by residents of Kodiak City and other road-connected communities (Brown et al. 2005, Fall et al. 2013, Fall et al. 2003, Fall et al. 2015).

The Buskin River and the waters immediately offshore from the mouth of the river were the most productive of all the different fishing locations reported by Kodiak City residents during the most recently published report on salmon harvests and uses in the Kodiak Area (Marchioni et al. 2016). As **Tables 1 and 2** illustrate, salmon has consistently ranked as one of the top resources in terms of bulk contribution to Kodiak Road Zone residents' overall subsistence harvests, at times trailing only non-salmon fish (ADF&G CSIS 2024; Marchioni et al. 2016). The average annual harvest of salmon per Kodiak Road Zone resident has been approximately 45 pounds, accounting for about 36% of the overall per capita harvest in each of the household surveys shown in **Table 1**. An average of about 91% of Kodiak Road Zone households reported using salmon during these surveys, while an average of 72% reported attempting to harvest salmon (**Table 2**).

It is perhaps particularly interesting to note the substantial differences in per person salmon harvest amounts (**Table 1**) and harvest participation (**Table 2**) captured in the 2012 household survey that compared rates of harvest, use, and sharing between Kodiak Road Zone subsistence permit holders and other residents (Marchioni et al. 2016). This information suggests that subsistence permit holders attempt to harvest, and harvest substantially more salmon than Kodiak Road Zone residents without subsistence permits (Marchioni et al. 2016). Further, participation in commercial fishing was positively correlated with participation in subsistence fishing (Marchioni et al. 2016). As Marchioni and colleagues (2012: 36) noted, Kodiak Road Zone households that obtained a subsistence salmon fishing permit tended to also fish commercially, depend on home-pack, and share salmon in ways that more closely resembled off-road communities like Larsen Bay and Old Harbor than their road zone neighbors without subsistence permits.

Table 1. Information on harvest amount and rank of salmon in terms of bulk contribution to subsistence harvests in Kodiak Road Zone communities/groups from household surveys 1991 - 2021 (ADF&G CSIS 2024; Marchioni et al. 2016).

Community/ Group	Study Year	Salmon Harvest per Person (lbs.)	Overall Subsistence Harvest per person (lbs.)	Percentage Salmon (%)	Overall Subsistence Rank of Salmon
Kodiak City	2021	34	74	46%	1st
Kodiak City	1993	48	151	32%	2nd
Kodiak Road Zone	2021	31	86	36%	2nd
Kodiak Road Zone Subsistence Permit Holders	2012	70	-	-	-
Kodiak Road Zone Other Residents	2012	28	-	-	-
Kodiak Road Zone	1991	61	168	36%	2nd
Average		45	120	36%	

Table 2. Information on the harvest, use, and sharing of salmon in Kodiak Road Zone communities/groups from household surveys conducted from 1991 - 2021 (ADF&G CSIS 2024; Marchioni et al. 2016).

Community/ Group	Study Year	Households Using (%)	Households Attempting to Harvest (%)	Households Harvesting (%)	Households Receiving (%)	Households Giving (%)
Kodiak City	2021	83%	56%	53%	57%	35%
Kodiak City	1993	93%	73%	69%	73%	61%
Kodiak Road Zone	2021	89%	70%	63%	54%	38%
Kodiak Road Zone Subsistence Permit Holders	2012	99%	89%	86%	46%	55%
Kodiak Road Zone Other Residents	2012	92%	60%	58%	61%	35%
Kodiak Road Zone	1991	91%	85%	80%	59%	60%
Average		91%	72%	68%	58%	47%

Effects of Salmon Declines

When salmon are scarce, area residents must rely upon secondary subsistence resources and/or purchase expensive store-bought foods (Marchioni et al. 2016). However, Kodiak/Aleutians Council members note that food is often in low supply at local grocery stores, making subsistence resources all the more critical for local users (KARAC 2022). The significant reductions in salmon stock available for subsistence harvest in recent years have caused increasing concerns about food security and the maintenance of subsistence lifestyles in the region (KARAC 2021a). When salmon returns along the Buskin River are particularly low, some subsistence users struggle to meet their harvest needs (KARAC 2022). When closures or impacts from marine mammals make fishing along the Buskin River untenable, many subsistence users must shift their harvest efforts to areas further away, such as Afognak, Saltery Creek, Ugak Bay, Port Lions, Pasagshak River, and Ouzinkie. However, not all users have the means to access these alternative harvest areas (KARAC 2021b, 2021c, 2022, 2023).

Issues with Permit System

Some federally qualified subsistence users harvest salmon exclusively in Federal marine waters near the Buskin River (KARAC 2010). However, most people harvest under State subsistence regulations, and many people remain unaware that a Federal subsistence permit exists (KARAC 2024). Council members have noted at recent Kodiak/Aleutians Council meetings that the current Federal permit limits can act as a barrier for federally qualified subsistence users who might want or need to harvest additional salmon (KARAC 2024). There is effectively no annual harvest limit under current Federal regulations, but local users must acquire an additional permit each time they harvest 25 salmon for themselves and for each of their household members listed on their subsistence permit. Local users often report using more than 25 salmon per household member, thus making the effort to acquire multiple permits necessary (KARAC 2010).

Previous research regarding State subsistence permits in the Kodiak Area, which currently operate under the same harvest limits and similar language, provide insights on subsistence salmon permits. In several communities in the Kodiak Area, people reported being unaware that they could obtain multiple permits, in part because permit instructions do not include this information explicitly (Williams et al. 2010). Additionally, people reported being unsure if their “household” could extend to their broader harvest sharing network or was limited to their fishing partners (Williams et al. 2010). Permit limits appear to exacerbate underreporting of harvest, as many people were afraid to report their true harvest amount if it was above the permit limit (Williams et al. 2010). This information suggests that confusion about the current permit system makes people unlikely to obtain subsequent permits after harvesting their initial limit.

Both Federal and State subsistence permits currently limit harvest in the Kodiak Road Zone to 25 salmon per person, plus an additional 25 salmon for each household member listed on the permit. Previous research indicates that these limitations are in place on State subsistence permits to try to prevent commercial fishing enterprises from harvesting under subsistence regulations, and to try and prevent overfishing by ensuring individuals do not harvest more than needed (Williams et al. 2010). It

is worth noting, however, that traditional subsistence practices are rooted in values of sharing harvests throughout the community, rather than retaining “excess” harvests for individual use (Ready 2017, Scaggs et al. 2021). Research in Alaska documents the widespread practice of sharing subsistence resources, showing how “super households” that harvest large quantities of a resource play a pivotal role in providing food to their entire community (Wolfe et al. 2010). Current permit harvest limits may be restricting these types of practices and values.

Harvest History

Most subsistence salmon harvest in the Kodiak Area occurs under State subsistence regulations (KARAC 2024). State subsistence permits are used to estimate the amount of salmon harvested in the Kodiak Area, but it is challenging to accurately estimate this harvest because many people do not return their harvest permits (Brown et al. 2023). Based on the most recent Alaska subsistence and personal use fisheries report, the total estimated subsistence salmon harvest for the Kodiak Area in 2020 was approximately 20,311 fish (Brown et al. 2023). However, only 230 of these salmon were taken through Federal subsistence permit (Brown et al. 2023). Though this overall harvest is much higher than the 12,688 salmon reported for 2019, it is in line with the most recently reported 5-year (2015–2019) average of 20,031 salmon. Still, the most recently reported 5-year harvest average is somewhat lower than the 10-year (2010–2019) harvest average of 25,318 salmon. Brown and colleagues (2023) suggest that the higher harvest amounts witnessed in 2020 compared to 2019 are related to greater fishing opportunities along the Kodiak road system (Buskin and Pasagshak Rivers), although it is unclear how fishing opportunities in these areas changed between 2019 and 2020.

The primary runs of Sockeye and Coho salmon present in Womens Bay are those returning to the Buskin River drainage. Both Federal and State subsistence users primarily harvest Sockeye and Coho salmon in Womens Bay, including in the marine waters near the mouth of the Buskin River. Substantial subsistence harvests occur on these fish stocks, and they are the single largest source of subsistence salmon harvested in the Federal waters within the Kodiak/Aleutians Region (Witteveen and Evans 2020). The marine waters adjacent to the mouth of the Buskin River are closed under State subsistence regulation and only recently reopened under Federal regulations. The Buskin River system is also one of the most popular sport fishing locations because it is easily accessible by road and located close to Kodiak City. Both Sockeye and Coho salmon are targeted in the sport fishery. Commercial fisheries in the marine waters surrounding Kodiak Island also harvest a small number of Buskin River salmon (Anderson et al. 2019). The Sockeye Salmon fisheries occur primarily in June due to the early run timing.

Subsistence Harvest

Between 2009 and 2023, the annual State subsistence harvests of Buskin River Sockeye Salmon have ranged from a high of 4,989 in 2017 to a low of 234 in 2021, with an average annual harvest of 2,686 (**Figure 2**). During this same time, the annual State subsistence harvests of Buskin River Coho Salmon have ranged from a high of 1,529 fish in 2014, to a low of 300 fish in 2017, with an average annual harvest of 712. The total number of State permits issued for subsistence harvest has declined from

2017 to 2023 (**Figure 2**). Few Federal subsistence permits are issued compared with State permits, and there is little Federal salmon harvest reported in most years (**Table 3**).

Actual harvest of salmon in the Kodiak Area may be much greater than what is reported, as harvest permits are often not returned or completed (Brown et al. 2023). Past research has found that harvest estimates compiled from household surveys are often far higher than those estimated from permit-based reporting (ADF&G 2008, Williams et al. 2010). Estimates of subsistence salmon use also do not include noncommercial salmon harvested with rod and reel, or commercial salmon harvest retained for personal use (Brown et al. 2023). Federally qualified subsistence users rely heavily on both rod and reel harvest and retention of commercially harvested salmon for subsistence in the Kodiak Area (Fall and Utermohle 1995, KARAC 2022).

Table 3. Federal subsistence permits issued and reported Federal harvest of Buskin River salmon from 2012 – 2023 (OSM 2024).

Year	Federal permits issued	Permits reporting harvest	Sockeye	Coho	Pink	Chum	Chinook	Total
2012	2	0	0	0	0	0	0	0
2013	7	1	36	0	0	0	0	36
2014	20	7	117	0	0	0	0	117
2015	18	4	42	0	0	0	0	42
2016	42	8	97	10	3	0	7	117
2017	55	14	369	7	5	0	0	381
2018	35	5	29	0	45	0	0	74
2019	40	1	24	0	0	0	0	24
2020	43	3	50	34	0	0	0	84
2021	18	0	0	0	0	0	0	0
2022	17	1	2	0	0	0	0	2
2023	20	3	52	26	0	0	0	78
Average	26	4	68	6	4	0	1	80

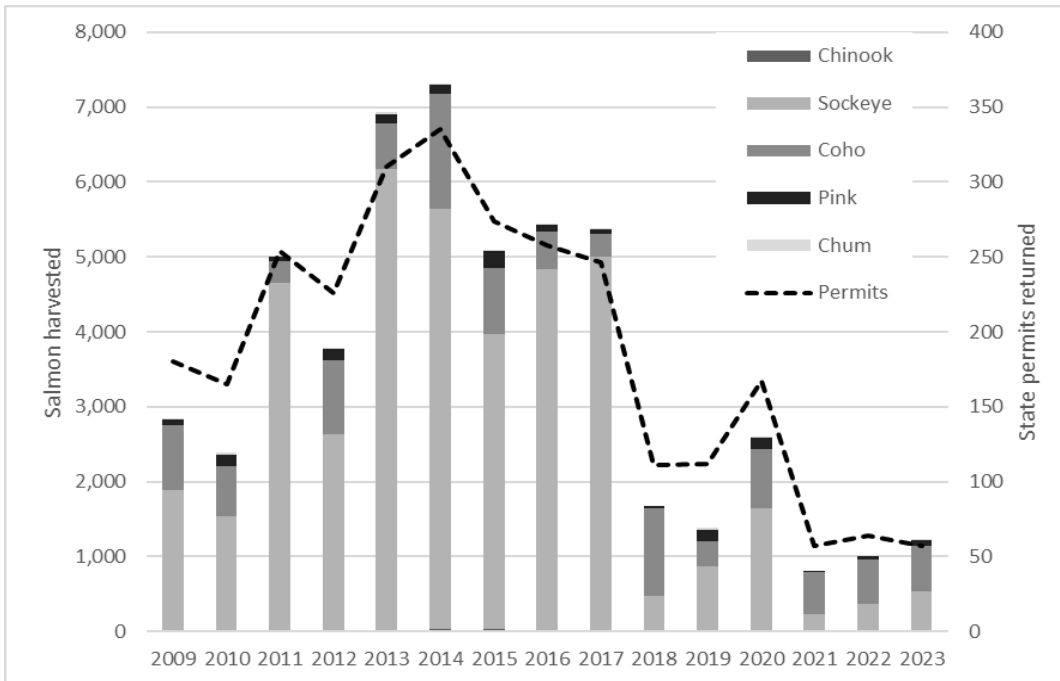


Figure 2. State subsistence salmon harvest from Buskin River, reported by species and permits returned 2009-2023. 2023 data may be incomplete (B. Mulligan pers. comm. 2024).

Sport Harvest

Between 2010 and 2022, the estimated annual sport harvest of Coho Salmon in the Buskin River ranged from 934 fish in 2019 to 5,388 in 2014, with an average annual harvest of 2,773 fish (**Table 4**). During this same time, the estimated annual sport harvest of Sockeye Salmon ranged from 100 fish in 2021 to 4,237 in 2014, with an average annual harvest of 1,664 fish (**Table 4**). During this period, the estimated average annual reported Sockeye Salmon sport harvest has been 43% less than the estimated average annual reported State subsistence harvest, while the estimated average annual reported Coho Salmon sport harvest has been more than triple the estimated average annual reported State subsistence harvest.

Table 4. Buskin River Sockeye and Coho salmon estimated sport fishery harvest 2010-2022 (ADF&G 2024a).

Year	Sockeye	Coho	Total
2010	332	2,847	3,179
2011	1,277	3,640	4,917
2012	1,484	1,926	3,410
2013	1,310	4,926	6,236
2014	4,237	5,388	9,625
2015	3,978	4,889	8,867
2016	2,503	1,895	4,398
2017	3,161	2,337	5,498
2018	335	1,793	2,128
2019	1,063	934	1,997
2020	1,715	1,205	2,920

Year	Sockeye	Coho	Total
2021	100	2,462	2,562
2022	137	1,808	1,945
Average	1,664	2,773	4,437
Std. Dev.	1,412	1,478	2,534

Alternative(s) Considered

One potential alternative would be to retain harvest permits but increase the per person harvest limit on each permit. Increasing harvest permit limits may reduce the number of additional permits federally qualified subsistence users may need to obtain. This regulatory change could better facilitate traditional subsistence practices in which people harvest greater quantities of salmon when fish are abundant and then share their harvest among their social network (Fall 1999, Wolfe et al. 2010, Marchioni et al. 2016, Haven 2022). Previous research documents that the current permit harvest limits and instructions on permits often cause confusion about the ability to obtain multiple permits, ultimately leading to inaccurate harvest reporting or foregone opportunities to harvest additional salmon (Williams et al. 2010). Increasing harvest permit limits may therefore reduce confusion and lead to more accurate reporting of subsistence salmon harvest.

This alternative may pose concerns in that increasing harvest permit limits may allow users to harvest salmon more rapidly, as opposed to the current system, which requires users to stop fishing and attain an additional permit after reaching the permit harvest limit. More rapid harvest of salmon could lead to rapid depletion of harvestable surplus by a small number of users, especially if salmon runs are poor. Previous discussion in Council meetings indicates that harvest along the Buskin River in recent years has been characterized by “a few people catching fish and then after that, nothing” (KARAC 2023: 15). Closures on the Buskin River are particularly challenging for subsistence users, some of whom are unable to travel to other harvest locations within the Kodiak Area (KARAC 2023). Thus, current harvest permit limits may provide benefits in that they may facilitate harvest by a greater number of users. Additional information from the Council and public testimony regarding the existing permit system would benefit more robust analysis of this alternative.

Effects of the Proposal

If this proposal is adopted, Federal salmon harvest permit limits would be the same for the road-accessible zone of the Kodiak Area and Kodiak Remainder, except the Women’s Bay area defined in § __.100.27(e)(9)(iii)(A). Federally qualified subsistence users would no longer be required to obtain multiple permits when harvesting more than 25 salmon per household member. Available ethnographic data suggests that adopting this proposal would likely not increase harvest amounts and would reduce confusion about harvest and permit limits, potentially improving harvest reporting.

However, adopting this proposal may exacerbate salmon conservation concerns. The Buskin River waters are among the most heavily fished in the Kodiak Area, and in recent years salmon runs have been poor and temporally variable. Poor salmon runs in some years have resulted in increased fishing competition and closures on the Buskin. In-season management decisions are made based on data from the Buskin River weir, which means that escapement goals may not be met if harvest in Womens Bay

and the marine waters near the mouth of the Buskin River occurs rapidly over a short period of time. Maintaining current harvest permit limits may prevent overharvest in these areas, thereby conserving the Buskin River salmon stocks.

If this proposal is not adopted, households needing an additional permit to harvest more salmon would continue to be required to obtain another permit before fishing. Federal subsistence regulations would continue to provide the same harvest opportunities as State subsistence regulations, with respect to number of fish allowed to be harvest per permit.

OSM CONCLUSION

Oppose FP25-06.

Justification

Salmon populations in the Buskin River have declined substantially in recent history, leading to several State and Federal closures to the harvest of Sockeye and Coho salmon. Removing harvest permit limits for salmon in most of the road-accessible Zone (Northeastern Kodiak Island) may lead to people harvesting salmon more quickly, possibly resulting in more rapid closures of the fisheries. This could undermine opportunity for some federally qualified subsistence users. Depending on the run strength, a few households could take the harvestable surplus of a species. This could lead to lost opportunity for even more users than the closures that occur under current regulations. The Council may wish to reconsider a proposal to remove harvest limits in the future if/when salmon population numbers improve.

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SUBSISTENCE REGIONAL ADVISORY COUNCIL RECOMMENDATION

Kodiak/Aleutians Alaska Subsistence Regional Advisory Council

Oppose FP25-06

The Kodiak/Aleutians Council opposed this proposal due to concerns about the potential for overharvest, and the possibility that without permit limits, a relatively small number of harvesters could take the harvestable surplus in a given year, and thereby eliminate harvest opportunities for other federally qualified subsistence users. However, the Council did explain that they continue to be concerned about the disproportionate harvest limits and reporting burdens placed on subsistence users compared to those placed on sport harvesters. They noted that it does not seem that subsistence is always being prioritized in the current system.

INTERAGENCY STAFF COMMITTEE COMMENTS

The Interagency Staff Committee found the staff analysis to be a thorough and accurate evaluation of the proposal and that it provides sufficient basis for the Regional Advisory Council recommendation and Federal Subsistence Board action on the proposal.

ALASKA DEPARTMENT OF FISH AND GAME COMMENTS

No Comment on FP25-06

WRITTEN PUBLIC COMMENTS

None