

FP25–07 Executive Summary

<p>General Description</p>	<p>Fisheries Proposal FP25-07 seeks to prohibit the use of nets and establish more conservative daily harvest limits for Russell and Trout creek drainages. It also proposes to require a Federal permit to fish in the Alaska Peninsula Area, and requests removing regulatory language that is no longer relevant to the Federal Subsistence Management Program. <i>Submitted by the Southern Alaska Fish and Wildlife Field Office, U.S. Fish and Wildlife Service (USFWS)</i></p>
<p>Proposed Regulation</p>	<p>See page 141 of this book for proposed regulations.</p>
<p>OSM Conclusion</p>	<p>Support with modification to implement current State sport fishing harvest limits and oppose requiring a Federal permit. The regulations permitting the use of certain low-impact methods and means without a permit should be retained.</p> <p>See page 153 of this book for proposed modified regulations.</p>
<p>Kodiak/Aleutians Subsistence Regional Advisory Council Recommendation</p>	<p>Support with modification to implement current State sport fishing harvest limits and oppose requiring a Federal permit. The regulations permitting the use of certain low-impact methods and means without a permit should be retained.</p> <p>See page 158 of this book for proposed modified regulations.</p>
<p>Interagency Staff Committee Comments</p>	<p>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.</p>
<p>ADF&G Comments</p>	<p>Neutral</p>
<p>Written Public Comments</p>	<p>None</p>

STAFF ANALYSIS
FP25-07

ISSUES

Fisheries proposal FP25-07 was submitted by the Southern Alaska Fish and Wildlife Field Office, U.S. Fish and Wildlife Service (USFWS). It seeks to prohibit the use of nets and establish more conservative daily harvest limits for Russell and Trout creek drainages. It also proposes to require a Federal permit to fish in the Alaska Peninsula Area, and requests removing regulatory language that is no longer relevant to the Federal Subsistence Management Program.

DISCUSSION

The Federal Subsistence Board (Board) rescinded fishing closures in Russell and Trout creek drainages during the last regulatory cycle (FCR21-13 and FCR23-13), resulting in the Alaska Peninsula Areawide Federal subsistence fishing regulations applying in these locations. The proponent states that these regulations are insufficient to protect fish populations in Russell and Trout creek drainages due to their proximity to Cold Bay and potential for overfishing. The proponent also states that some regulations should be removed because they are outdated and unnecessary. The proponent further states that requiring a Federal permit will help to better account for fish harvested under Federal regulation and aid Federal fisheries management. In the Alaska Peninsula Area, you are required to have a Subsistence Fishing Permit when fishing for salmon under Federal subsistence regulation. Currently, only a State subsistence fishing permit is available. Therefore, federally qualified subsistence users fishing under Federal regulations must report their harvest on a State subsistence permit.

Existing Federal Regulation

§ ____.27(e)(7) *Alaska Peninsula Area*

(i) You may take fish, other than salmon, rainbow/steelhead trout, or char, at any time unless restricted under the terms of a subsistence fishing permit. If you take rainbow/steelhead trout incidentally in other subsistence net fisheries or through the ice, you may retain them for subsistence purposes.

(ii) You may take salmon, trout, and char only under the authority of a subsistence fishing permit.

(iii) You must keep a record on the reverse side of the permit of subsistence-caught fish. You must complete the record immediately upon taking subsistence-caught fish and must return it no later than October 31.

(iv) You may take salmon at any time, except in those districts and sections open to commercial salmon fishing where salmon may not be taken during the 24 hours before

and 12 hours following each State open weekly commercial salmon fishing period, or as may be specified on a subsistence fishing permit.

(v) You may take salmon by seine, gillnet, rod and reel, or with gear specified on a subsistence fishing permit. You may also take salmon without a permit by snagging (by handline or rod and reel), using a spear, bow and arrow, or capturing by bare hand.

(vi) You may take fish other than salmon by gear listed in this part unless restricted under the terms of a subsistence fishing permit.

(vii) You may not use a set gillnet exceeding 100 fathoms in length.

(viii) You may take no more than 250 salmon for subsistence purposes unless otherwise specified on your subsistence fishing permit.

Proposed Federal Regulation

§ __.27(e)(7) Alaska Peninsula Area

~~(i) You may take fish, other than salmon, rainbow/steelhead trout, or char, at any time, unless restricted under the terms of a subsistence fishing permit. If you take rainbow/steelhead trout incidentally in other subsistence-net fisheries or through the ice, you may retain them for subsistence purposes.~~

(ii) A Federal subsistence fishing permit is required to take fish within the Alaska Peninsula Area.

(iii) You may not take fish by net in freshwaters of Russell and Trout Creek.

(iv) You may take no more than 250 salmon annually for subsistence purposes within the Alaska Peninsula Area. You may take no more than 5 salmon plus an additional 5 salmon daily for each member of your household listed on the permit from Russell or Trout Creek.

(v) You must keep a record on the reverse side of the permit of subsistence-caught fish. You must complete the record immediately upon taking subsistence-caught fish and must return it no later than January 31.

~~(ii) You may take salmon, trout, and char only under the authority of a subsistence fishing permit.~~

~~(iii) You must keep a record on the reverse side of the permit of subsistence-caught fish. You must complete the record immediately upon taking subsistence-caught fish and must return it no later than October 31.~~

~~(iv) You may take salmon at any time, except in those districts and sections open to commercial salmon fishing where salmon may not be taken during the 24 hours before~~

~~and 12 hours following each State open weekly commercial salmon fishing period, or as may be specified on a subsistence fishing permit.~~

~~(v) You may take salmon by seine, gillnet, rod and reel, or with gear specified on a subsistence fishing permit. You may also take salmon without a permit by snagging (by handline or rod and reel), using a spear, bow and arrow, or capturing by bare hand.~~

~~(vi) You may take fish other than salmon by gear listed in this part unless restricted under the terms of a subsistence fishing permit.~~

~~(vii) You may not use a set gillnet exceeding 100 fathoms in length.~~

~~(viii) You may take no more than 250 salmon for subsistence purposes unless otherwise specified on your subsistence fishing permit.~~

Relevant Federal Regulation

§ __.25 *Subsistence taking of fish, wildlife, and shellfish: general regulations.*

(a) Definitions. The following definitions apply to all regulations contained in this part:

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Subsistence fishing permit means a subsistence harvest permit issued by the Alaska Department of Fish and Game or the Federal Subsistence Board.

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§ __.27 *Subsistence Taking of Fish*

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(b) Methods, means, and general restrictions.

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(16) Unless specified otherwise in this section, you may use a rod and reel to take fish without a subsistence fishing permit. Harvest limits applicable to the use of a rod and reel to take fish for subsistence uses shall be as follows:

(i) If you are required to obtain a subsistence fishing permit for an area, that permit is required to take fish for subsistence uses with rod and reel in that area. The harvest and possession limits for taking fish with a rod and reel in those areas are the same as indicated on the permit issued for subsistence fishing with other gear types.

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(18) Provisions on ADF&G subsistence fishing permits that are more restrictive or in conflict with the provisions contained in this section do not apply to Federal subsistence users.

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Existing State Regulation

Subsistence Regulations

Alaska Peninsula Area

5 AAC 01.420. Lawful gear and gear specifications

(a) Salmon may be taken only by seine and gillnet, or with gear specified on a subsistence fishing permit.

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(d) Except as specified in (a) and (c) of this section, a permit holder may not operate a

(1) set gillnet that is more than 100 fathoms in length; and

(2) drift gillnet that is more than 200 fathoms in length.

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5 AAC 01.430. Subsistence fishing permits

(a) Salmon, trout, and char may only be taken under the authority of a subsistence fishing permit. The department will only issue one permit per household.

(b) No more than 250 salmon may be taken for subsistence purposes, per household, unless otherwise specified by a local representative of the department on the subsistence fishing permit. A permit holder may obtain an additional permit from the department.

(c) A record of subsistence-caught fish must be kept on the permit. The record must be completed immediately upon taking subsistence-caught fish and must be returned to the local representative of the department no later than October 31.

5 AAC 01.425 Waters closed to subsistence fishing

The following waters are closed to subsistence fishing for salmon:

(1) Russell Creek and Nurse Lagoon and within 500 yards from the stream terminus of Russell Creek and Nurse Lagoon;

(2) Trout Creek and within 500 yards outside its mouth;

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Sport Regulations

5 AAC 65.020. General provisions for seasons and bag, possession, annual, and size limits for the Alaska Peninsula and Aleutian Islands Area

Except as otherwise provided in 5 AAC 65.022, 5 AAC 65.051, or by an emergency order issued under AS 16.05.060, the seasons and bag, possession, annual, and size limits for finfish and shellfish in the Alaska Peninsula and Aleutian Islands Area are as follows:

(1) king salmon:

(A) in fresh waters: may be taken only from January 1 through July 25, except that king salmon may be taken in the Chignik River only from January 1 through August 9, and as follows:

(i) 20 inches or greater in length; bag and possession limit of two fish; annual limit of five fish; 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; no annual limit;

(B) in salt waters: may be taken from January 1 through December 31; bag and possession limit of two fish; no size limit; no annual limit;

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

(A) 20 inches or greater in length; bag limit of five fish and a possession limit of 10 fish;

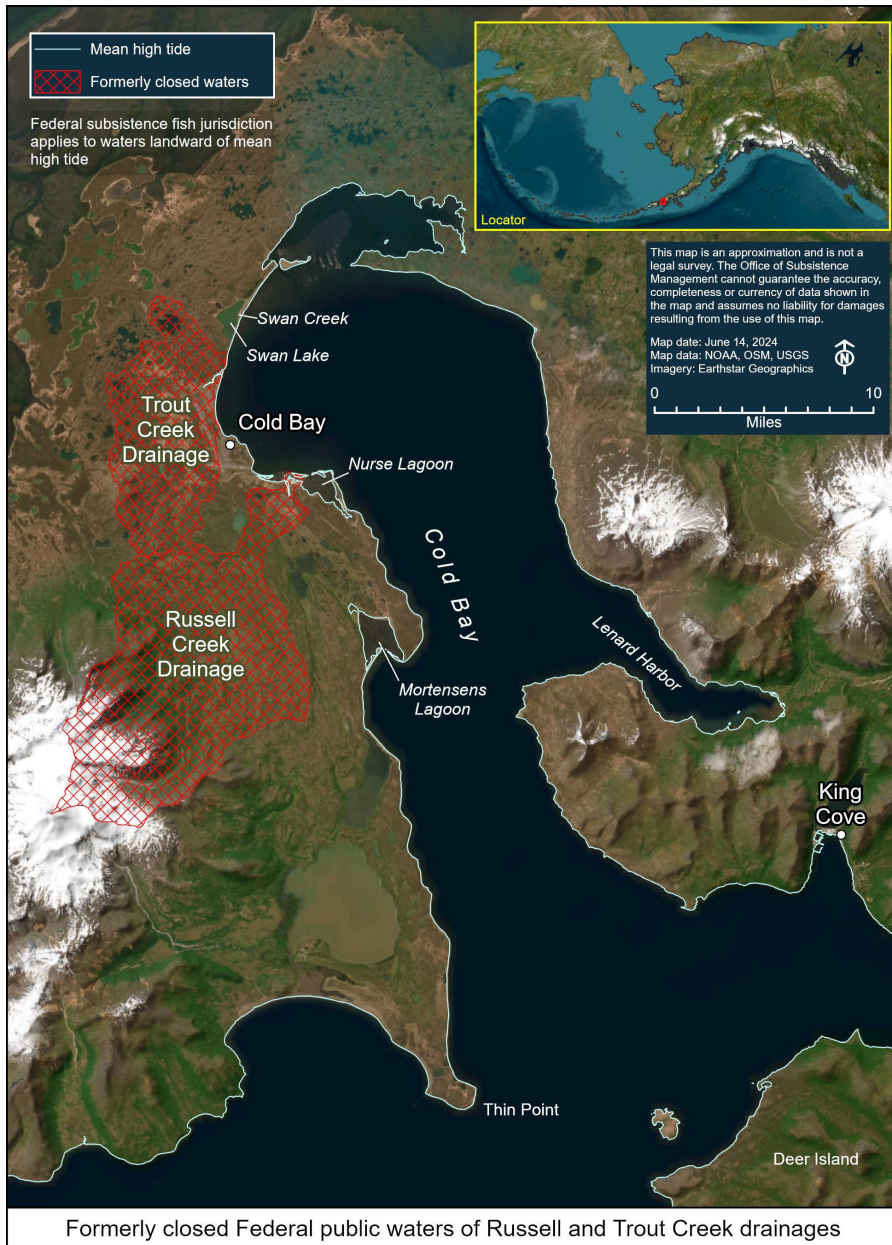
(B) less than 20 inches in length; bag and possession limit of 10 fish;

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Extent of Federal Public Lands/Waters

For the 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. According to § ___.27(e)(7): The Alaska Peninsula

Area includes all waters of Alaska on the north side of the Alaska Peninsula southwest of a line from Cape Menshikof (57°28.34' North latitude, 157°55.84' West longitude) to Cape Newenham (58°39.00' North latitude, 162° West longitude) and east of the longitude of Cape Sarichef Light (164°55.70' West longitude) and on the south side of the Alaska Peninsula from a line extending from Scotch Cape through the easternmost tip of Ugamak Island to a line extending 135° southeast from Kupreanof Point (55°33.98' North latitude, 159°35.88' West longitude) (see **Alaska Peninsula Area map**). The entirety of Russell Creek and Trout Creek drainages are Federal public waters within and adjacent to the external boundaries of the Alaska Peninsula National Wildlife Refuge (**Map 1**).



Map 1. The Trout Creek and Russell Creek drainages and areas used by residents of Cold Bay and King Cove to harvest salmon for subsistence: Mortensens Lagoon, Thin Point, Lenard Harbor, and Swan Lake.

Customary and Traditional Use Determination

Residents of the Alaska Peninsula Area have a customary and traditional use determination for all fish in the Alaska Peninsula Area.

Regulatory History

In 1990, the Federal Subsistence Management Program adopted temporary subsistence management regulations for Federal public lands in Alaska to fulfill the requirements of Title VIII of ANILCA (55 Fed. Reg 126; 27125 [June 29, 1990]). In an effort to minimize disruption to the State's continuing fish and game management because of the uncertainty over the resumption of State management of subsistence, these temporary regulations maintained a State-implemented closure to subsistence fishing in Russell and Trout creek drainages. In 1992, the Federal Subsistence Management Program announced permanent regulations governing the harvest of fish for subsistence uses in waters qualifying as Federal "public lands" under ANILCA (57 FR 22940). The closure to Federal subsistence fishing in the Russell and Trout Creek drainages was maintained at this time.

In 2007, the Board adopted Fisheries Proposal FP08-11, which changed the Alaska Peninsula Area subsistence fishing regulations to allow taking salmon without a permit by snagging (by handline or rod and reel), using a spear, bow and arrow, or capturing by bare hand. The Board felt this was a reasonable accommodation for federally qualified subsistence users to harvest a small number of fish for immediate use when travelling light on the landscape (FSB 2007).

At the direction of the Board, the Office of Subsistence Management (OSM) conducted a review of the Russell Creek closure (FCR21-13) during the 2021-2023 fisheries regulatory cycle, and a review of the Trout Creek closure (FCR23-13) during the 2023-2025 fisheries regulatory cycle. The Kodiak/Aleutians Subsistence Regional Advisory Council (Kodiak/Aleutians Council) recommended that the Russell Creek closure be deferred to the following fisheries regulatory cycle to gather more public input and the Board agreed. Both closure reviews were addressed during the 2023-2025 regulatory cycle. The Board acted in line with the Council's recommendation to rescind the closures to provide opportunity for federally qualified subsistence users and to be able to provide a rural preference in times of conservation concern. Because no parallel proposals were submitted at the time to establish specific fishing regulations for this newly opened area, the Alaska Peninsula Areawide regulations went into effect.

Biological Background

Russell Creek has been surveyed and found to contain Chum, Coho, Pink, and Sockeye salmon, as well as Steelhead Trout (Johnson and Blossom 2018). Annual indexing of Chum and Pink salmon escapement is conducted through aerial surveys and recent data shows variable returns (**Table 1**). There was also a count of 600 Coho Salmon observed during the 2014 season (Keyse and Fox 2015), and a count of 100 Sockeye Salmon observed during the 2020 season (Fox et al. 2021).

Anadromous species present in the Trout Creek drainage are Chum, Coho, Pink, and Sockeye salmon (Johnson and Blossom 2021). However, none of the Trout Creek fish populations are regularly monitored so there is little abundance information available. Aerial surveys of Trout Creek have been conducted opportunistically since 1979. The maximum number of salmon observed during these surveys was 1,000 Sockeye, 1,736 Coho, 2,300 Pink, and 1,200 Chum salmon (Burch 2022, pers. comm.). A fish passage assessment conducted in 2015 identified two culverts in the lower Trout Creek drainage that are assumed unsuitable for fish passage (Eisenman and O’Doherty 2018). However, anadromous species were documented at several locations upstream of those culverts in 2005 (Johnson and Blossom 2021).

Table 1. Aerial survey estimates of Chum and Pink salmon in Russell Creek 2013-2021 (Poetter and Nichols 2014; Keyse and Fox 2015; Keyse et al. 2016; Fox et al. 2017, 2018, 2019, 2020, 2021, 2022).

Year	Chum Salmon	Pink Salmon
2013	20,000	8,000
2014	55,500	60,400
2015	18,800	29,000
2016	113,000	0
2017	125,000	140,000
2018	12,500	2,500
2019	15,000	38,000
2020	13,800	11,800
2021	32,400	23,500
Average	45,111	34,800

Cultural Knowledge and Traditional Practices

Cold Bay and King Cove are the Alaska Peninsula communities that have the most convenient access to Russel and Trout Creeks. The population of Cold Bay has been generally declining since 1980 and was estimated at 57 people in 2023 (**Table 2**). The population of King Cove, however, is substantially larger, estimated at 874 people in 2023 (**Table 2**).

Cold Bay is home to the Izembek National Wildlife Refuge offices. It is located at the western end of the Alaska Peninsula, 634 miles southwest of Anchorage and 180 miles northeast of Unalaska. Cold Bay developed as a military town in the 1940s, though it has a much longer history of occupation by the Alutiiq/Sugpiaq (Braund 1986). In addition to USFWS managed lands, King Cove Native Corporation owns land in Cold Bay that extend from Russell Creek east and south to Mortensen’s Lagoon (Pettersen et al. 1983).

King Cove is located along a small cove on the south side of the Alaska Peninsula, between Belkofski Bay on the east and Cold Bay on the west. It was founded in 1911 by cannery operators and commercial fishermen. Although founded initially by non-Natives, Alutiiq residents from nearby communities gradually migrated to King Cove for employment (Reedy-Maschner 2010). The original cannery operated continuously from 1911 until 1976, when it was partially destroyed by a fire (ADCCED 2024). Still, the economy of King Cove remains largely dependent on commercial fishing

and seafood processing (ADCCED 2024). Travel between King Cove and Cold Bay is limited to boat or plane. A high priority for King Cove residents has long been the construction of road access through the Izembek Wilderness Area to provide a more reliable link to Cold Bay during emergencies. King Cove residents have been requesting this road for decades and are again awaiting the decision on a proposed land transfer that would allow the road to be built (USFWS 2013, KARAC 2023).

Table 2. The populations of Cold Bay and King Cove, 1960–2023 (Source: ADCCED 2024).

Community	1960	1970	1980	1990	2000	2010	2020	2023
Cold Bay	86	256	192	148	88	108	50	57
King Cove	290	283	460	677*	792	938	757	874
Total	376	539	652	148	880	1,046	807	931

*The U.S. Census left out Ram Creek Subdivision in the community total of 451 in 1990 (ADLWFD 1993: 82).

Russell and Trout creeks are located along the road system in Cold Bay (Eisenmann and O’Doherty, 2018). Both creeks are highly accessible and have been popular spots for sportfishing by local and non-local residents. Both creeks are also important to local subsistence users in Cold Bay (Risdaul 2024, pers com). However, it has only been possible to harvest salmon in Russell and Trout Creeks under State sport fishing regulations until very recently. Trout Creek has been described as “one of the most important sport fishing locations for Coho in the area” (KARAC 2022: 83), while Russell Creek has been described as “supporting the largest sport fishery in the area” (ADF&G 2023: 22). Accessing Russell Creek requires getting a permit from the King Cove Corporation, and requests for this access have increased in recent years (KARAC 2022). Alternatively, people may use Bureau of Land Management easements to access Russell Creek (Risdaul 2020, pers comm.).

Harvest Practices

Salmon have accounted for a significant proportion of the subsistence resources harvested by King Cove and Cold Bay residents. The estimated harvest of salmon by residents of King Cove and Cold Bay, based on household surveys, is described in **Table 3**. King Cove residents harvested over 17,000 salmon in 1992 and in 2016 (**Table 3**). This salmon harvest accounted for over 50% of their overall wild resource harvests in both survey years. Cold Bay residents harvested 1,141 salmon in 2016, and salmon accounted for roughly 64% of their overall wild resource harvests in during this study year (**Table 3**). King Cove residents harvested about 44 pounds more salmon per person than Cold Bay residents in 2016 (**Table 3**). Sockeye Salmon accounted for more than half of the total salmon harvest in King Cove and Cold Bay during the 1992 and 2016 survey years (ADF&G 2022).

Table 3. The estimated harvest of salmon for subsistence in numbers of fish, per person harvest of salmon in pounds edible weight, and the percentage of salmon in the total wild resource harvest, based on household surveys conducted in study years 1992 and 2016 (Source: ADF&G 2022).

Community	Study Year	Estimated Harvest (# of fish)	Lower Harvest estimate (# of fish)	Upper harvest estimate (# of fish)	Per person harvest (lbs.)	Percentage of total wild resource harvest (lbs.)
King Cove	1992	17,073	10,985	23,161	137	53%
King Cove	2016	17,445	12,245	23,095	192	64%
Cold Bay	2016	1,141	1,191	1,994	148	64%

While data on subsistence practices by Cold Bay residents is limited, the most common harvesting methods used by King Cove residents have been seines and/or gill nets (Braund et al. 1986, Fall et al. 1993). Household survey data from 1992 indicates that about 31% of King Cove households relied on these harvesting methods (Fall et al. 1993). Overall, King Cove residents harvested an estimated total of 7,036 salmon using seine or gillnet in 1992 (Fall et al. 1993). In contrast, only 1,304 salmon (8% of the total subsistence salmon harvest) were harvested using rod and reel in 1992 (Fall et al. 1993). Although these data are limited to one year, they suggest that rod and reel harvest is insufficient to meet subsistence needs.

For both King Cove and Cold Bay residents, the primary areas accessed to harvest subsistence Sockeye and Coho salmon are Mortensen’s Lagoon, Thin Point Lagoon, and Leonard Harbor (Johnson and Fox 2015). However, since 2013, more subsistence harvest efforts have shifted to Swan Lake and Swan Creek, corresponding with salmon declines at Mortensen’s Lagoon (ADF&G 2023). Harvest at Swan Creek increased notably beginning in 2020 (KARAC 2022). King Cove residents also harvest salmon at Deer Island, Morzhovoi Bay, and Pavlof Bay, and will use rod and reel to harvest salmon in waters adjacent to town, such as at Ram’s Creek, Russell Creek, and Trout Creek (Braund et al. 1986, Reedy-Maschner 2010, Risdahl 2024, pers. comm). Ethnographic research by Braund and colleagues (1986) revealed that King Cove residents also harvest salmon in portions of the Russell Creek drainage but not the Trout Creek drainage, however, these harvest patterns may have shifted due to the episodic production of sockeye salmon in the area’s small drainages (ADF&G 2023).

Subsistence harvest in King Cove does not just fulfill an economic need for food security but also provides critical cultural experiences and opportunities to hone harvest skills that are applied to commercial activities (Braund et al. 1986). Commercial fishing and subsistence are key components of life and identity in King Cove (Braund et al. 1986). As of 2006, approximately two-thirds of King Cove households had a family member who fished commercially within the past five years (Knapp and Lowe 2007). Retention of salmon in “home packs” from commercial harvest also plays a significant role in subsistence and can help mitigate the high cost of living in the area (Braund et al. 1986, Reedy-Maschner 2010). Household survey data found that 51% and 27% of subsistence salmon was removed from commercial catch in 1992 and 2016, respectively (Fall et al. 1993, ADF&G 2022). In years where market prices for salmon are low, people may retain larger quantities of commercially harvested

salmon for household consumption than when prices are high (Fall et al. 1993). Sockeye and Chinook Salmon are the main species retained, and commercial fishermen and crew members will widely distribute these salmon throughout their community networks (Reedy-Maschner 2010). Importantly, subsistence harvest data collected by ADF&G do not include “home packs,” nor does the total number of subsistence permits issued indicate the total number of people relying on subsistence resources (Fall et al. 1993, Brown et al. 2021).

Recent Subsistence Concerns

King Cove residents’ participation in, and access to, commercial fisheries has declined over time, in part due to increasingly restrictive regulations (Knapp and Lowe 2007). Salmon limited entry, halibut and Sablefish Individual Fishing Quotas (IFQs), and crab rationalization programs have made permits costly and reduced the number of crew jobs. As a result, it is increasingly difficult for people to fish for a living—a practice that has characterized King Cove and Alutiiq culture for generations (Knapp and Lowe 2007). Given the reliance on commercial harvest for subsistence, decreased participation in and access to commercial fisheries is a major economic challenge for King Cove residents (Reedy-Maschner 2010).

In April 2024, Peter Pan Seafoods announced it would be ceasing operations of their King Cove facility for both summer and winter cycles for the foreseeable future. This announcement follows a last-minute decision to not open for the winter “A” season, which eliminated the most accessible market for local fishermen. It is unclear whether the King Cove plant will be acquired by Silver Bay Seafoods, which is acquiring other Peter Pan facilities in the state (Greenly 2024). The relationship between the cannery and King Cove residents has long been strained. For instance, until 1949 the cannery blocked attempts to incorporate King Cove as a second-class city for fear of the tax burden, and more recently the cannery has threatened to withhold fuel and other amenities if fishermen strike in protest of low fish prices (Reedy-Maschner 2010).

Regardless, the city of King Cove is highly reliant on the cannery and commercial fishing in general. In 1985, it was the largest processing facility in the state: producing salmon, Tanner crab, halibut, herring, Dungeness crab, and Black Cod (Braund et al. 1986). It has offered year-round employment in King Cove since the 1970s, and has provided services such as fuel, grocery credit, mechanics and replacement parts for fishing vessels, bookkeeping services, mail services, and fleet insurance (Braund et al. 1986, Fall et al. 1993, Reedy-Maschner 2010). The cannery is the largest local taxpayer, and from Fiscal Year 2002–2006 accounted for more than half of the city’s revenues (Knapp and Lowe 2007, Reedy-Maschner 2010). Council members report that the closure of the cannery will have direct impacts on King Cove harvesters (KARAC 2024). In recent years, when processing plants closed early, local harvesters were unable to sell their products to nearby facilities, which “left the guys in King Cove pretty much standing with no market” (KARAC 2024: 33). In addition to impacting income, the closure of the facility may also negatively impact people’s ability to retain salmon for subsistence from commercial catch.

The growth of sport hunting and fishing in the area has also impacted local users' ability to meet their subsistence harvest needs in recent years. Kodiak/Aleutians Council members have described increasing competition in the area from nonlocal sport hunters and fishing guides, particularly since Alaska Airlines began flying into Cold Bay (KARAC 2021a, 2021b). Public testimony during a recent Council meeting notes that "with the popularization of guided hunting and fishing trips surrounding the area of Cold Bay, hunting and fishing pressures have become too great for subsistence users to obtain a secure food source...Sport users far outnumber the subsistence users in total take of fish, this should be mitigated following State and Federal regulations that subsistence takes priority [over sport fishing]" (KARAC 2021b: 94). Nonlocals coming to the area for multiple days of guided duck hunting and Coho Salmon sport fishing often displace residents from Cold Bay at Russell and Trout creeks (Ris Dahl 2024, pers comm.).

A report provided to the Kodiak/Aleutians Council by ADF&G stated that, depending on the year, sportfishing accounted for 4% to 20% of the yearly salmon harvest in the Cold Bay area (KARAC 2022). Russell and Trout Creeks are both popular sport fishing locations for local and nonlocal people harvesting under State sport fishing regulations (KARAC 2022). Other sources also note that most nonlocals fish at Mortensen's Lagoon because it is easily accessible from the airport (Tscherich and Russ 2008, Brown et al. 2021). Most guided anglers travel to Cold Bay both to fish for Coho Salmon and hunt waterfowl (ADF&G 2023). While angler effort does not appear to have increased from 1993-2023, Coho Salmon harvests appear to be generally increasing in the area (ADF&G 2023).

Harvest History

Harvest at Russell Creek has long been limited to sport fishing. Russell Creek is closed to subsistence fishing under State regulations and has only been open to Federal subsistence fishing since 2024. The general Alaska Peninsula/Aleutian Island Remote Zone sport fishing salmon regulations allow 5 salmon (combination of species excluding Chinook Salmon) per day and 10 in possession. However, there is no specific sport harvest reported for Russell Creek as harvest here is typically quite low. Still, from 2009 to 2018, the estimated annual harvest calculated from Statewide Sport Fish Harvest Surveys for the combined Cold Bay Area ranged from 1,249 to 5,048 salmon (estimates are provided when 12 or more Harvest Survey responses are received) (ADF&G 2020).

Similarly, no subsistence harvest has occurred in the Trout Creek drainage, including within 500 yards of its mouth, as this area is closed to State subsistence harvest and the Trout Creek drainage has only been open to Federal subsistence fishing since 2024. Trout Creek is open to harvest under State sport fishing regulations, but this harvest data is combined and reported with all of Area R (Alaska Peninsula) harvests. Therefore, the exact number of salmon harvested in Trout Creek under State sport fishing regulations is unknown (Alaska Sport Fishing Survey Database 2022).

Alternative(s) Considered

One alternative is to prohibit the use of nets in Russell and Trout creeks, but not set daily harvest limits for federally qualified subsistence users. Under this alternative, most local users would likely continue to use rod and reel to harvest salmon in these creeks but would be able to harvest more fish. This

alternative would provide increased subsistence opportunity for local users and could possibly help address local concerns about competition with nonlocals coming to the area for sport fishing. However, both Russell and Trout creek only support small salmon runs and may be susceptible to over harvest. Data on harvest from these creeks by local users is not available, making it difficult to assess how much salmon local users typically harvest from Russell and Trout creeks. It is possible that salmon populations would be negatively impacted if there are no harvest limits in these small systems.

Effects of the Proposal

If adopted, this proposal would have four distinct effects:

- (1) **Permit requirement:** Federally qualified subsistence users harvesting under Federal subsistence regulations in the Alaska Peninsula Area would be required to obtain a Federal permit, which has not previously been required. This permit would not change the total annual harvest limit of 250 salmon per permit holder, but daily harvest limits would be implemented for the Russell and Trout creek drainages.
- (2) **Allowable gear:** Federally qualified subsistence users would not be permitted to use nets to harvest salmon in Russell or Trout creek drainages, and they would no longer be allowed to take salmon without a permit by snagging (by handline or rod and reel), using a spear, bow and arrow, or capturing by bare hand in the Alaska Peninsula Area. Allowable gear would include gear types from general regulations listed at § ___.27(b)(1) that are not nets. Practical gear types allowed would be rod and reel, handline, and spear. It is likely that federally qualified subsistence users would primarily use rod and reel in this situation based on previous documentation of harvest strategies in these drainages.
- (3) **Harvest Limits:** Federally qualified subsistence users harvesting salmon at Russell or Trout creek drainages would be limited to 5 salmon per day, plus an additional 5 salmon per household member listed on their Federal permit. Compared to the current Federal subsistence regulations, this would reduce harvest opportunity. These limits are also more restrictive than State sport fishing regulations, which permit an individual to harvest up to 5 Sockeye, Coho, Pink, or Chum salmon 20 inches long or more, and up to 10 salmon less than 20 inches long. Therefore, an individual harvesting under State sport fishing regulations could potentially harvest up to 15 salmon per day, not including the permitted harvest of King Salmon, which are not known to occur in Russell and Trout creeks. The proposed new Federal regulations would only permit individuals to harvest this many fish if they are also harvesting for other household members. Adopting the proposed harvest limits for Russell and Trout creek drainages may help mitigate the potential for conservation concerns, but they may also unnecessarily restrict the harvesting efforts of federally qualified subsistence users in these areas.
- (4) **Regulation simplification:** Alaska Peninsula Area regulations would be simplified by removing unnecessary language that is not applicable to the Federal Subsistence Management Program. The primary regulatory language to be removed relates to marine waters and specifying items regarding take on permits. First, there are no longer marine waters under Federal jurisdiction in the Alaska Peninsula Area. Second, the only way to change Federal subsistence regulations regarding take of fish is through a proposal during the Federal fisheries regulatory cycle, or in-season by special action.

OSM CONCLUSION

Support FP25-07 with modification to implement current State sport fishing harvest limits and oppose requiring a Federal permit. The regulations permitting the use of certain low-impact harvest methods and means without a permit should be retained.

The modified regulation should read:

§ ____.27(e)(7) *Alaska Peninsula Area*

~~(i) You may take fish, other than salmon, rainbow/steelhead trout, or char, at any time, unless restricted under the terms of a subsistence fishing permit. If you take rainbow/steelhead trout incidentally in other subsistence-net fisheries or through the ice, you may retain them for subsistence purposes.~~

~~(ii) You may take A subsistence fishing permit is required to take salmon, trout, and char. only under the authority of a subsistence fishing permit. Except a permit is not necessary to take salmon by snagging (by handline or rod and reel), using a spear, bow and arrow, or capturing by bare hand.~~

~~(iii) You must keep a record on the reverse side of the permit of subsistence-caught fish. You must complete the record immediately upon taking subsistence-caught fish and must return it no later than October 31.~~

~~(iii) You may not take fish by net in freshwaters of Russell Creek or Trout Creek drainages.~~

~~(iv) You may take no more than 250 salmon annually for subsistence purposes within the Alaska Peninsula Area. In the Russell Creek or Trout Creek drainages, for each household member listed on the permit, you may take no more than:~~

~~(1) king salmon:~~

~~(A) 20 inches or greater in length; two fish daily~~

~~(B) less than 20 inches in length; 10 fish daily;~~

~~(2) salmon, other than king salmon:~~

~~(A) 20 inches or greater in length; 5 fish daily~~

~~(B) less than 20 inches in length; 10 fish daily~~

~~(iv) You may take salmon at any time, except in those districts and sections open to commercial salmon fishing where salmon may not be taken during the 24 hours before and 12 hours following each State open weekly commercial salmon fishing period, or as may be specified on a subsistence fishing permit.~~

~~(v) You may take salmon by seine, gillnet, rod and reel, or with gear specified on a subsistence fishing permit. You may also take salmon without a permit by snagging (by handline or rod and reel), using a spear, bow and arrow, or capturing by bare hand.~~

~~(vi) You may take fish other than salmon by gear listed in this part unless restricted under the terms of a subsistence fishing permit.~~

~~(vii) You may not use a set gillnet exceeding 100 fathoms in length.~~

~~(viii) You may take no more than 250 salmon for subsistence purposes unless otherwise specified on your subsistence fishing permit.~~

Justification

Rescinding the Federal subsistence fishing closure in Russell and Trout creek drainages created harvest opportunity for federally qualified subsistence users in these fisheries, but it could lead to conservation concerns in these small systems if nets are allowed to facilitate the harvest of up to 250 salmon at any time. Prohibiting nets and adopting smaller daily limits for Russell and Trout creek drainages will help mitigate the potential for conservation concerns. Current State sport fishing harvest limits permit an individual to harvest up to 15 Sockeye, Coho, Pink, or Chum salmon, depending on length, which represents increased harvest opportunity compared to the proposed Federal harvest limit of 5 salmon per day. Implementing State sportfishing harvest limits for Russell and Trout creeks would provide more opportunity than the proposed harvest limit and would follow previous actions taken for a previously closed area of Federal waters at Womens Bay on Kodiak Island (FP23-06b).

Requiring a Federal permit for the entire Alaska Peninsula Area would be burdensome for federally qualified subsistence users because the only Federal issuing office is the USFWS Izembek Refuge Office in Cold Bay. The Federal Subsistence Management Program does not yet have a system to issue permits and report harvest online. However, the current Federal permitting system is being revised and online issuing and reporting capabilities may be available for the 2025 regulatory year.

In 2007, the Board adopted regulations allowing certain low impact harvest methods and means to be used in the Alaska Peninsula Area without a permit. These methods and means should be retained because there is no evidence to suggest that they have had negative impacts on area fish populations. Alaska Peninsula Area regulations will be simplified by removing unnecessary language that is no longer applicable to the Federal subsistence program.

LITERATURE CITED

ADCCED (Alaska Department of Commerce, Community, and Economic Development) 2024. DCRA Open Data, online database. <https://dcra-cdo-dcced.opendata.arcgis.com/>, retrieved June 3, 2024. Division of Community and Regional Affairs.

ADF&G. 2020. Alaska Sport Fishing Survey database. 1996– Present. Anchorage, AK: Alaska Department of Fish and Game, Division of Sport Fish. <http://www.adfg.alaska.gov/sf/sportfishingsurvey/>. Retrieved: May 28, 2020.

ADF&G. 2022. Community Subsistence Information System. Online database <https://www.adfg.alaska.gov/sb/CSIS/>. Division of Subsistence, Anchorage, AK.

ADF&G. 2023. Staff comments on commercial, personal use, sport, and subsistence regulatory proposals: Committee of the whole-groups 1-5 for Alaska Peninsula / Aleutian Island / Chignik finish. Alaska Department of Fish and Game, Alaska Board of Fisheries Meeting. February 20-25, 2023. Anchorage, AK. 240 pp.

ADLWFD (Alaska Department of Labor and Workforce Development). 1993. Alaska population overview. 1991 census estimates. Administrative Services Division. Juneau, AK.

Alaska Sport Fishing Survey Database. 2022. 1996– Present. Anchorage, AK: Alaska Department of Fish and Game, Division of Sport Fish. <http://www.adfg.alaska.gov/sf/sportfishingsurvey/>. Retrieved: June 6, 2022.

AMHS. 2022. 2022 Annual traffic volume report. Alaska Marine Highway System. 102 pp.

Braund, S.R., et al. 1986a. A description of the socioeconomic and sociocultural systems of the Aleutian Pribilof Island region. Social and Economic Studies Program Technical Report No. 188. Anchorage, AK. Minerals Management Service. 490 pp.

Braund, S.R., D.C. Burnham, L. Morehead, and L. Hale. 1986b. Effects of renewable resource harvest disruptions on community socioeconomic and sociocultural systems: King Cove. U.S. Department of the Interior, Minerals Management Service. Social and Economic Studies Program. Technical Report Number 123. Anchorage.

Brown, C.L., J.A. Fall, and A. Godduhn, L. Hutchinson-Scarborough, B. Jones, J.M. Keating, B.M. McDavid, C. McDevitt, E. Mikow, J. Park, L.A. Sill Lauren, and T. Lemons. 2021. Alaska Subsistence and Personal Use Salmon Fisheries 2018 Annual Report. ADF&G Division of Subsistence, Technical Paper No. 484.

Burch, M. 2022. Special Projects Coordinator. Personal communication, unpublished data: email. ADF&G. Anchorage, AK.

Eisenman, M., and G. O’Doherty. 2018. Fish passage assessment and culvert inventory on the King Cove and Cold Bay road systems. Alaska Department of Fish and Game, Fishery Data Series No. 18-28, Anchorage.

FAA. 2023. Enplanements at all airports (primary, non-primary commercial service, and general aviation) by state and airport. CY 2012-2022. Federal Aviation Administration. https://www.faa.gov/airports/planning_capacity/passenger_allcargo_stats/passenger/previous_years#2013. Accessed 23 May 2024.

Fall, J.A. and R. Mason, T. Haynes, V. Vanek, L. Brown, G. Jennings, C. Mishler, and C. Utermohle. 1993. Noncommercial harvest and uses of wild resources in King Cove, Alaska, 1992. ADF&G Division of Subsistence, Technical Paper No. 227.

Fox, E. K. C., T. D. Lawson, and R. L. Renick. 2021. South Alaska Peninsula salmon annual management report, 2020, and the 2019 subsistence fisheries in the Alaska Peninsula, Aleutian Islands, and Atka-Amlia Islands Management Areas. Alaska Department of Fish and Game, Division of Commercial Fisheries, Regional Information Report No. 4K21-12, Kodiak.

Fox, E. K. C., T. D. Lawson, and R. L. Renick. 2022. 2021 South Alaska Peninsula salmon annual management report and 2020 subsistence fisheries in the Alaska Peninsula, Aleutian Islands, and Atka-Amlia Islands management areas. Alaska Department of Fish and Game, Division of Commercial Fisheries, Regional Information Report 4K22-01, Kodiak.

Fox, E. K. C., C. G. Lipka, and L. K. Strumpf. 2018. South Alaska Peninsula salmon annual management report, 2017 and the 2016 subsistence fisheries in the Alaska Peninsula, Aleutian Islands, and Atka-Amlia Islands management areas. Alaska Department of Fish and Game, Regional Information Report No. 4K18-05. Kodiak, AK. <http://www.adfg.alaska.gov/FedAidPDFs/RIR.4K.2018.05.pdf>

Fox, E. K. C., C. G. Lipka, and M. E. Loewen 2017. South Alaska Peninsula salmon annual management report, 2016. Alaska Department of Fish and Game, Fishery Management Report No. 17-33, Anchorage, AK. <http://www.adfg.alaska.gov/FedAidPDFs/FMR17-33.pdf>

Fox, E. K. C., L. K. Strumpf, and C. J. Whiteside. 2019. South Alaska Peninsula salmon annual management report, 2018 and the 2017 subsistence fisheries in the Alaska Peninsula, Aleutian Islands, and Atka-Amlia Islands management areas. Alaska Department of Fish and Game, Regional Information Report No. 4K19-01. Kodiak, AK. <http://www.adfg.alaska.gov/FedAidPDFs/RIR.4K.2019.01.pdf>

Fox, E. K. C., and C. J. Whiteside. 2020. South Alaska Peninsula salmon annual management report, 2019 and the 2018 subsistence fisheries in the Alaska Peninsula, Aleutian Islands, and Atka-Amlia Islands management areas. Alaska Department of Fish and Game, Division of Commercial Fisheries, Regional Information Report 4K20-10, Kodiak.

FSB. 2007. Transcripts of the Federal Subsistence Board proceedings. December 11-13, 2007. Office of Subsistence Management, USFWS. Anchorage, AK

Greenly, T. 2024. Peter Pan Seafoods announces it will cease operations. KUCB. Alaska Public Media. Unalaska, AK. <https://alaskapublic.org/2024/04/16/peter-pan-seafoods-announces-it-will-cease-operations/>. Accessed 23 May 2024.

Johnson, J. and B. Blossom. 2018. Catalog of waters important for spawning, rearing, or migration of anadromous fishes - Southwestern Region, Effective June 1, 2018. Alaska Department of Fish and Game, Special Publication No. 18-06, Anchorage, AK.

Johnson, J. and B. Blossom. 2021. Catalog of waters important for spawning, rearing, or migration of anadromous fishes - Southwestern Region, Effective June 1, 2021. Alaska Department of Fish and Game, Special Publication No. 21-05, Anchorage, AK.

Johnson, R.H. and E.K.C. Fox. 2015. Annual summary of the 2014 commercial and personal use salmon fisheries and salmon escapements, and the 2013 subsistence fisheries in the Alaska Peninsula, Aleutian Islands, and Atka-Amlia Islands Management Areas. ADF&G Fisheries Management Report No. 15-36. <http://www.adfg.alaska.gov/FedAidPDFs/FMR15-36.pdf>

KARAC. 2021a. Transcripts of the Kodiak Aleutians Regional Advisory Council proceedings. March 9, 2021. Teleconference. Office of Subsistence Management, USFWS. Anchorage, AK.

KARAC. 2021b. Transcripts of the Kodiak Aleutians Regional Advisory Council proceedings. September, 2021. Teleconference. Office of Subsistence Management, USFWS. Anchorage, AK.

KARAC. 2022. Transcripts of the Kodiak Aleutians Regional Advisory Council proceedings. September 21-22, 2022. Cold Bay, Alaska. Office of Subsistence Management, USFWS. Anchorage, AK.

KARAC. 2023. Transcripts of the Kodiak Aleutians Regional Advisory Council proceedings. September 19-20, 2023. King Cove, AK. Office of Subsistence Management, USFWS. Anchorage, AK.

KARAC. 2024. Transcripts of the Kodiak Aleutians Regional Advisory Council proceedings. March 8, 2024. Anchorage, AK. Office of Subsistence Management, USFWS. Anchorage, AK.

Keyse, M. D., C. W. Russell, and E. K. C. Fox. 2016. South Alaska Peninsula salmon annual management report, 2015. Alaska Department of Fish and Game, Fishery Management Report No. 16-02, Anchorage, AK.
<http://www.adfg.alaska.gov/FedAidPDFs/FMR16-02.pdf>

Keyse, M. D. and E. K. C. Fox. 2015. South Alaska Peninsula salmon annual management report, 2014. Alaska Department of Fish and Game, Fishery Management Report No. 15-35, Anchorage, AK.
<http://www.adfg.alaska.gov/FedAidPDFs/FMR15-35.pdf>

Knapp, G. and M. Lowe. 2007. Economic and social impacts of BASI crab rationalization on the communities of King Cove, Akutan and False Pass. Aleutians East Borough, City of King Cove. 125 pp.
<https://www.arlis.org/docs/vol1/B/237240161.pdf>

McMurren, S. 2020. Alaska airlines adds Cold Bay as its newest destination. Anchorage Daily News.
<https://www.adn.com/alaska-life/travel/2020/05/16/alaska-airlines-adds-cold-bay-as-its-newest-destination/>. Accessed 23 May 2024.

Petterson, J.S., B.M. Harris, L.A. Palinkas, and S. Langdon. 1983. Cold bay: Ethnographic study and impact analysis. U.S. Department of the Interior, Minerals Management Service. Alaska OCS Social and Economic Studies Program. Final Technical Report 93.

Poetter, A. D. and N. W. Nichols. 2014. South Alaska Peninsula salmon annual management report, 2013. Alaska Department of Fish and Game, Fishery Management Report No. 14-15, Anchorage, AK.
<http://www.adfg.alaska.gov/FedAidPDFs/FMR14-15.pdf>

Reedy-Maschner, K.L. 2010. Aleut identities. McGill-Queens University Press. Montreal, Kingston, London, and Ithaca. 314 Pages.

Risdahl, G. 2020. Supervisor, Division of Fisheries. Personal communication: email. Office of Subsistence Management, USFWS, Anchorage, AK.

Risdahl, G. 2024. Subsistence Program Leader, U.S. Forest Service. Personal communication: teleconference. Office of Subsistence Management, USFWS, Anchorage, AK

Tschersich, P. and E. A. Russ. 2008. Annual summary of the commercial, subsistence, and personal use salmon fisheries and salmon escapements in the Alaska Peninsula, Aleutian Islands, and Atka-Amlia Islands management areas, 2007. ADF&G, Fishery Management Report No. 08-22, Anchorage, AK.

USFWS. 2013. Record of Decision. Izembek National Wildlife Refuge land exchange / road corridor. Final environmental impact statement. United States Department of the Interior, United States Fish and Wildlife Service. 20 pp.

SUBSISTENCE REGIONAL ADVISORY COUNCIL RECOMMENDATION

Kodiak/Aleutians Alaska Subsistence Regional Advisory Council

Support FP25-07 with Modification

The Kodiak/Aleutians Council supported FP25-07 with OSM's modifications because they felt that stronger conservation measures were needed to protect the salmon populations in these relatively small systems. The Council noted that the OSM modified proposal should promote conservation by restricting more efficient harvest methods like gillnets and seines, and by setting more conservative daily harvest limits. However, the Council felt that these harvest limits should not be more restrictive than current State sport fishing regulations. The Council opposed to Federal permit requirement due to the potential difficulties of associated with acquiring the permit when only one Federal permitting office is in the area and there is currently no online permitting system available.

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

Fisheries Proposal FP25-07

This proposal would prohibit nets and set more conservative daily harvest limits for Russell and Trout Creek drainages and require a federal permit to fish in the Alaska Peninsula Area. This proposal also requests to remove regulatory language that is no longer relevant to the Federal Subsistence Management Program.

Position

The Alaska Department of Fish & Game (ADF&G) is **NEUTRAL** on this proposal. Though slightly less conservative than current sportfish regulations on the Alaska Peninsula because it allows an individual to harvest the daily limit of their entire household, this proposal seeks to align federal regulations with current daily state bag limits and eliminate the use of nets within freshwaters. This proposal also aligns with current state subsistence annual limit of 250 salmon per household.

Background

Utilization of salmon through state regulations on Russell and Trout Creeks are common practice for the residents of Cold Bay and King Cove. Most residents of Cold Bay do not hold commercial salmon permits and salmon can only be obtained through sport and subsistence fishing. Many of the residents of King Cove have commercial salmon permits and have greater opportunities to take salmon for personal use and to also use commercial gear for subsistence purposes.

Impact on Subsistence Users

If adopted there would be no impact to subsistence users.

Impact on Other Users

If adopted there would be no impact on other users.

Opportunity Provided by State

State customary and traditional use findings: The Alaska Board of Fisheries (BOF) has made positive customary and traditional use findings for finfish in the Alaska Peninsula

Amounts Reasonably Necessary for Subsistence: Alaska state law requires the BOF to determine the amount of the harvestable portion of a fish population that is reasonably necessary for customary and traditional uses. This is an ANS. The BOF does this by reviewing extensive harvest data from all Alaskans, collected either by ADF&G or from other sources.

ANS provides the BOF with guidelines on typical numbers of fish harvested for customary and traditional uses under normal conditions. Fishing regulations can be re-examined if harvests for customary and traditional uses consistently fall below ANS. This may be for many reasons: fishing regulations, changes in fish abundance or distribution, or changes in human use patterns, just to name a few.

The ANS for salmon and finfish other than salmon in Alaska Peninsula is 34,000 - 56,000 salmon and 47,000 – 79,000 pounds of finfish other than salmon.

5 AAC 01.410 - Fishing seasons

- (a) In the Alaska Peninsula Area, salmon may be taken at any time, except
 - (1) in those districts and sections open to commercial salmon fishing, a commercial salmon fishing permit holder may not subsistence fish for salmon during the 24 hours before a commercial salmon fishing period or the 12 hours following the closure of a commercial salmon fishing period; however, a commercial salmon fishing permit holder may choose to subsistence fish instead of commercial fish for salmon during a commercial salmon fishing period;
 - (2) as otherwise specified on a subsistence fishing permit; and
 - (3) in the waters closed to subsistence fishing for salmon specified in 5 AAC 01.425.
- (b) Fish, other than salmon, rainbow trout, and steelhead trout, may be taken at any time unless restricted under the terms of a subsistence fishing permit. Rainbow trout and steelhead trout, taken incidentally in other subsistence finfish net fisheries or through the ice, are lawfully taken and may be retained for subsistence purposes.

5 AAC 01.430 – Subsistence fishing permits

- (a) Salmon, trout, and char may only be taken under the authority of a subsistence fishing permit. The department will only issue one permit per household.
- (b) No more than 250 salmon may be taken for subsistence purposes, per household, unless otherwise specified by a local representative of the department on the subsistence fishing permit. A permit holder may obtain an additional permit from the department.

5 AAC 65.020 - General provisions for seasons and bag, possession, annual, and size limits for the Alaska Peninsula and Aleutian Islands area

- (1) King salmon:
 - (A) In fresh waters: may be taken only from January 1 through July 25, except that king salmon may be taken in the Chignik River only from January 1 through August 9, and as follows:
 - (i) 20 inches or greater in length; bag and possession limit of two fish; annual limit of five fish; 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; no annual limit.
- (2) salmon, other than king salmon: may be taken from January 1 through December 31 as follows:

- (A) 20 inches or greater in length; bag limit of five fish and a possession limit of 10 fish;
- (B) Less than 20 inches in length; bag and possession limit of 10 fish.

Conservation Issues

There are no conservation issues pertaining to this proposal.

Enforcement Issues

There are no enforcement issues pertaining to this proposal.

WRITTEN PUBLIC COMMENTS

None