

FP27-05 Executive Summary	
General Description	Fisheries Proposal FP27-05 requests that the Federal Subsistence Board restrict allowable gear to rod and reel within Kazakoff, AKA Danger Bay. <i>Submitted by: Andy Christofferson</i>
Proposed Regulation	§___.27(e)(9) Kodiak Area *** <i>(iii) You may subsistence fish for salmon with rod and reel only in the following locations:</i> *** <i>(D) In the northeast arm of Kazakof Bay (Danger Bay) north and east of a line bound by a point on the west shore at 58° 12.55' North latitude, 152° 34.30' West longitude and a point on the east shore at 58° 12.47' North latitude, 152° 33.93' West longitude.</i>
OSM Preliminary Conclusion	Oppose FP27-05
Kodiak/Aleutians Subsistence Regional Advisory Council Recommendation	
Interagency Staff Committee Comments	
ADF&G Comments	
Written Public Comments	None

DRAFT FISHERIES ANALYSIS FP27-05

ISSUES

Fisheries Proposal FP27-05, submitted by Kodiak resident Andy Christofferson, requests to limit Federal subsistence methods and means upstream of regulatory markers in Kazakof (Danger) Bay (**Figure 1**) to rod and reel only. The proposed changes would enact methods and means in line with State sport fishing regulations.

PROPONENT STATEMENT

This proposal seeks to more closely align State and Federal regulations to protect Coho Salmon (*Oncorhynchus kisutch*) in Danger Bay. A State subsistence fishing closure was approved by the Alaska Board of Fisheries (BOF) in 2024. The proponent requests comparable restrictions for federally qualified subsistence users to safeguard Coho Salmon spawning runs in Danger and Cascade creeks by prohibiting the use of gillnets and beach seines.

Current Federal Regulation (36 CFR 242.27 and 43 CFR 51.27)

§ ___.27(e)(9) Kodiak Area

(iii) You may subsistence fish for salmon with rod and reel only in the following locations:

(C) In Afognak Bay north and west of a line from the tip of Last Point to the tip of River Mouth Point.

(viii) You may take salmon only by gillnet, rod and reel, or seine.

Relevant Federal Regulation

§ ___.27 Subsistence taking of fish

(b) Methods, means, and general restrictions.

(10) You may not take fish for subsistence uses within 300 feet of any dam, fish ladder, weir, culvert or other artificial obstruction, unless otherwise indicated.

(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.

§ __.27(e)(9) Kodiak Area

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

(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

§ __.27(e)(9) Kodiak Area

(iii) You may subsistence fish for salmon with rod and reel only in the following locations:

(D) In the northeast arm of Kazakof Bay (Danger Bay) north and east of a line bound by a point on the west shore at 58° 12.55' North latitude, 152° 34.30' West longitude and a point on the east shore at 58° 12.47' North latitude, 152° 33.93' West longitude.

Current State Regulation

Subsistence Regulations

Kodiak Area

5 AAC 01.525 Waters closed to subsistence fishing

The following waters are closed to subsistence fishing for salmon:

(12) all waters within the Northeast Arm of Kazakof Bay (Danger Bay) north and east of a line bound by a point on the west shore at 58° 12.55' N. lat., 152° 34.30' W. long., and a point on the east shore at 58° 12.47' N. lat., 152° 33.93' W. long.

Sport Regulations

Kodiak Area

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 21, 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;

(c) In the Kodiak Remote Zone, the following bag and possession limits apply to salmon, other than king salmon:

(1) for salmon, other than king salmon, 20 inches or greater in length, the bag limit is five fish and 10 fish in possession;

(2) for salmon, other than king salmon, less than 20 inches in length, the bag and possession limit is 10 fish.

Commercial Regulations

Kodiak Area

5 AAC 18.350. Closed waters. (Salmon may not be taken in the following waters:

(6) Afognak District

(A) Kazakof Bay (Danger Bay): north of 58° 10.88; N. Lat.,;

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 43 CFR 51.3. This proposal pertains to Federal marine waters of Danger Bay north and east of a line bounded by a point on the west shore at 58° 12.55' North latitude, 152° 34.30' West longitude., and a point on the east shore at 58° 12.47' North latitude, 152° 33.93' West longitude (Figure 1).

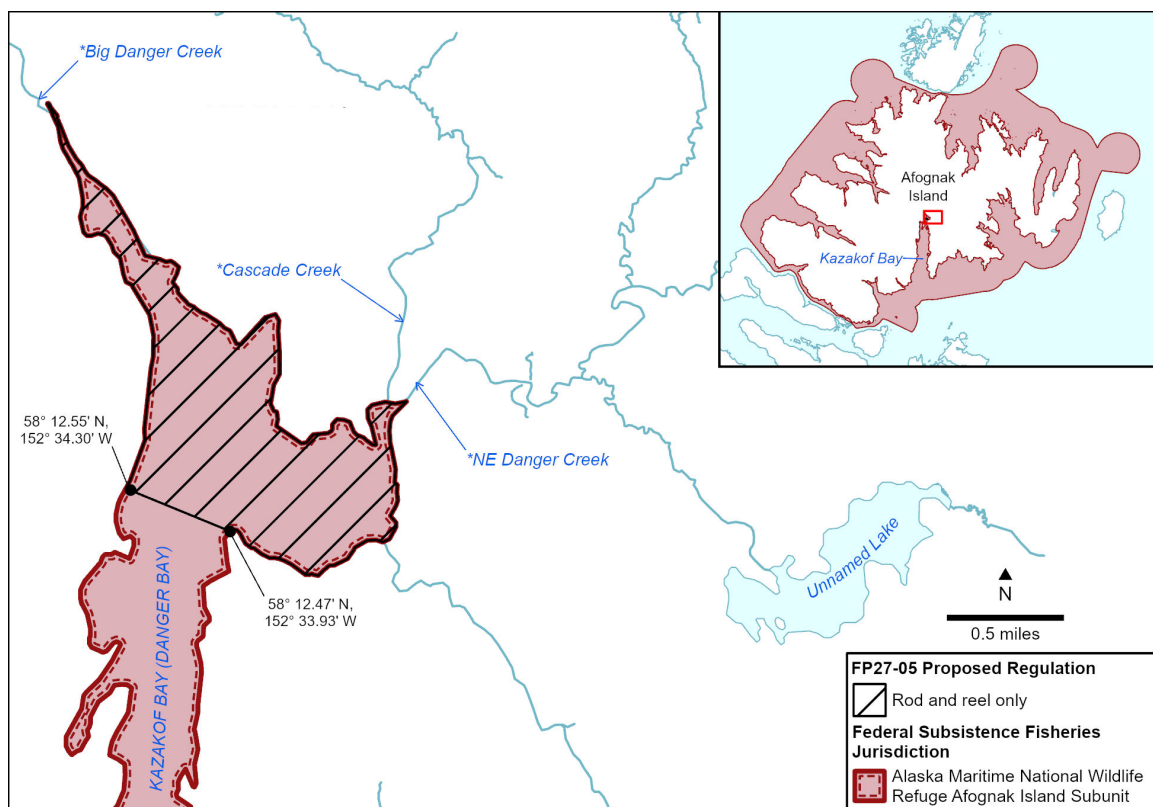


Figure 1. Map showing marine waters of Afognak Island under Federal jurisdiction and the upper Kazakof (Danger) Bay waters corresponding to proponent's proposed rod and reel Federal subsistence fishery.

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 1892, President Harrison issued Proclamation 39, Establishing the Afognak Forest and Fish Culture Reservation, which set aside "Afognak Island, Alaska and its adjacent bays and rocks and territorial waters, including among others the Sea Lion Rocks and Sea Otter Island..." for forestry and fish culture purposes (U.S. Government Publishing Office 2026). This proclamation is the basis for Federal marine water jurisdiction around Afognak Island (**Figure 1**).

In 1992, the Federal Subsistence Management Program announced regulations governing the harvest of fish for subsistence uses in waters qualifying as "public lands" under Alaska National Interest Lands Conservation Act (ANILCA) (57 FR 22940). These initial regulations incorporated many provisions from State subsistence fishing regulations, including the closures of Afognak Bay and freshwaters of Afognak Island.

The BOF voted unanimously to close the head of Danger Bay to State subsistence users at their 2023/24 Kodiak finfish meeting (ADF&G 2024a). The BOF noted that a rod and reel sport fishery remained available within the closed area and that State subsistence opportunities exist in marine waters beyond the closure. The Kodiak State Fish and Game Advisory Committee voted 12:1 in favor of the closure, with the person opposing later giving personal public testimony in favor. The Village of Ouzinkie initially submitted RC 31 in opposition to the closure; however, they subsequently withdrew their letter. Other public testimony at the BOF meeting with regards to Proposal 58 referenced precautionary measures considering Coho Salmon declines in the Buskin and Pasagshak rivers (ADF&G 2024b).

Current Events

A concurrent proposal, FP27-04 is being considered which would revise the Kodiak area Customary and Traditional use determination for salmon to exclude the Kodiak Station Census Designated Place (CDP), which includes the currently excluded Coast Guard base in addition to off base military housing. This change in Customary and Traditional use determination would restrict those living outside of the Coast Guard Station, but within the CDP from participating in all area Federal subsistence fisheries, including those on Afognak Island.

Biological Background

Danger Bay is located just west of Afognak Bay on Afognak Island (**Figure 1**). The area has no road access or major population centers. Marine waters adjacent to Afognak Island salmon bearing streams support an important Coho Salmon fishery (Polum et al. 2023). Freshwater streams draining to the head of Danger Bay provide spawning and rearing habitat for Coho, Chum, and Pink salmon (**Table 1**; ADF&G 2025a).

Table 1. Watersheds draining to the head of Danger Bay. Species represented include Chum (CH), Coho (CO) and Pink (P) salmon. Spawning (s) and rearing (r) life stages correspond to species present (ADF&G 2025a).

Drainage	Species and Lifestage
Big Danger	CH _s , CO _{sr} , P _s
Cascade	CO _r , P _r
Northeast Danger	CH _{sr} , CO _r , P _s

Afognak Area Coho Salmon escapement data are available from the Afognak/Litnik River weir, located one bay south and west of Danger Bay. The weir has been operational since 2001, with the exception of 2004-05. Weir operation prioritizes Sockeye Salmon counts and, as such, complete Coho Salmon counts are available for only seven of twenty-three available monitoring years (**Table 2**). Within this subset of seven years, Coho Salmon escapement ranged from a high of 11,983 in 2001 to a low of 395 in 2022 and averaged 7,031 fish.

Table 2. Afognak/Litnik River Coho Salmon escapement monitoring (ADF&G 2025b)

Year	Coho Salmon
2001	11,983
2002	8,654
2010	10,289
2012	5,701
2013	8,974
2014	3,220
2022	395
AVERAGE	7,031

Regional Coho Salmon escapement estimates also exist for the American, Buskin, Olds, and Pasagshak rivers, all of which are located on Kodiak Island. In most years, a weir on the Buskin River provides Coho Salmon escapement data, although it is typically removed before the peak of migration due to budget and weather constraints. Additional Coho Salmon escapement data are collected through foot surveys on the American, Olds and Pasagshak rivers. Estimates are highly variable. The two larger rivers, Buskin and Pasagshak, meet their lower escapement bounds of 4,700 and 1,200 fish, respectively, five out of every ten years. Olds River consistently meets its 500 fish escapement goal. And the American River met escapement (400 fish) two out of the last ten years (Polum et al. 2023).

Escapement variability is also reflected in the history of Kodiak area Coho Salmon sport fisheries in-season management actions. Since 2018, ADF&G has issued emergency orders closing Coho Salmon sport fisheries on the Buskin in 2021 and on the American and portions of the Olds rivers in 2024. Fisheries were conversely liberalized on the Buskin in 2021, the American and Olds in 2020, and on the Pasagshak in 2018, 2020, 2021, and 2023 (ADF&G 2025b, 2026).

In addition to being remote, Coho Salmon escapement surveys also coincide with the fall rainy season when streams are turbid and visibility is low (Anderson et al. 2023a). Barriers to site access and fish sighting can limit data collection and quality. While historical surveys do not provide escapement counts, they do highlight trends. In this case, the data show a pattern of overall decline in indexed escapement estimates, and a marked drop in the early 2000s coinciding with increased commercial harvest rates (**Figure 2**).

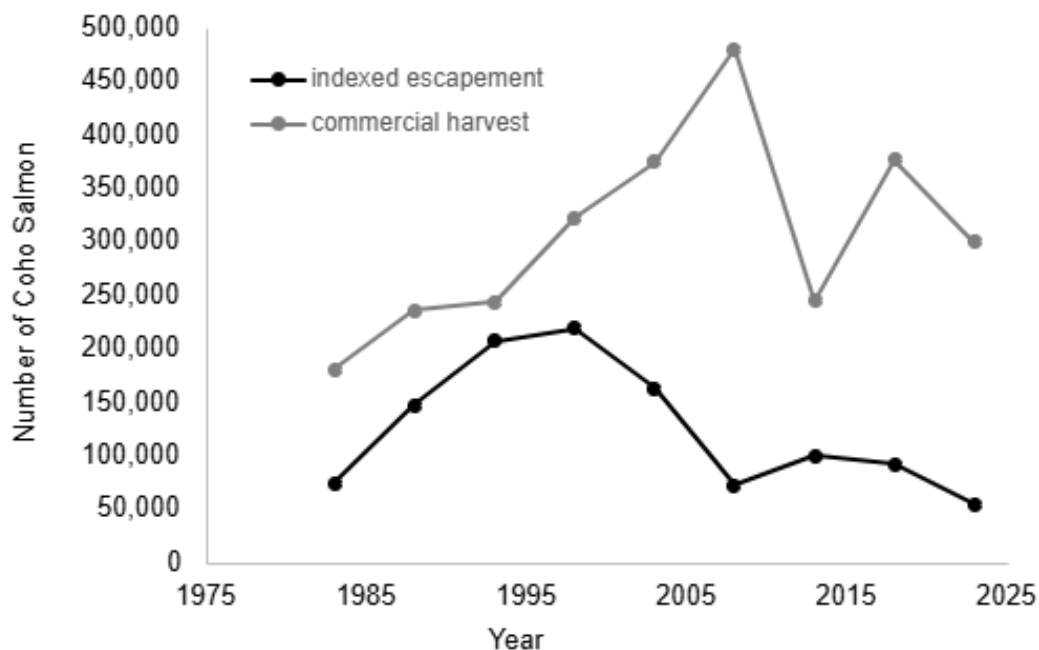


Figure 2. Historical Kodiak Area indexed Coho Salmon escapement and commercial catch 1979–2023. Plotted points represent five-yearly moving averages. Data are derived from Anderson et al. 2023a.

Council members reported Coho Salmon declines across Kodiak Island in 2024, particularly on the west side (KARAC 2025). In contrast, members discussed exceptionally strong Coho Salmon runs on Kodiak the following year. Reports mention the Buskin River meeting the lower escapement goal despite the weir being pulled ahead of peak movement, as well as strong runs and harvest across Pasagshak, Olds and American rivers. This was particularly notable following 2024 American River Coho Salmon closures. Member Rohrer remarked that “The [Coho Salmon] run was probably...the best...I’ve ever seen...” (**Table 2**; KARAC 2026: pg. 24).

Cultural Knowledge and Traditional Practices

Kazakof Bay (Danger Bay) is in the traditional use area of the Alutiiq, who have resided in the Kodiak Archipelago for at least 7,500 years (Saltonstall and Steffian 2024) and historically occupied numerous sites on Afognak Island (Mishler and Cohen 1996). One of these sites was located along Portage Creek, between Discoverer Bay and Kazakof Bay, where residents built stone weirs to catch great quantities of salmon for food and trade (Steffian and Saltonstall 2024). Much of this salmon was traditionally dried and stored for winter use (Steffian 2024). Along with salmon, subsistence

economies in the Kodiak Archipelago have been based on the harvesting of maritime resources like marine mammals, ocean fish, shellfish, and sea or littoral birds and their eggs for generations (Mason 1995, Clark 1998).

Russian sailors and traders first arrived on Afognak Island in the mid-1700s (Pullar 2004). During the Russian period, the Northeast Company and the Russian American Company forced many Alutiiq to work as sea otter hunters in service of the fur trade (Pullar 2004). By the 1820s, the Company was faced with the problem of an aging Russian workforce, many of whom had started families with Alutiiq women and did not desire to return home to Russia in their retirement (Wessels pers. comm. 2026). The Company eventually addressed this issue by offering retirement-age employees the option to return to Russia or homestead near fish streams on Afognak Island (Pullar 2004). This policy contributed to the convergence of two neighboring communities into one community at Afognak Village with two distinct areas called Aleut Town (Nasqualek) and Russian Town (Derevnya [Village] Rutkovskoe), by the late 1800s or early 1900s (Pullar 2004, Wessels pers. comm. 2026). It also increased the competition that Native villagers faced for subsistence resources in the area (Pullar 2004).

The development of the commercial fishing industry further impacted traditional subsistence practices in the area (Pullar 2004). In 1964, the Good Friday Earthquake generated a tsunami that destroyed Afognak Village (*Aq'waneq*). A new community called Port Lions (*Masiqsiraq*) was subsequently developed on northeastern Kodiak Island with the assistance of the Lions Club, and most of the former residents of Afognak moved there permanently in late 1964 (DCRA 2025a). Though Port Lions residents maintain strong ties to Afognak Island, a small Russian Old Believers community called Aleneva now occupies a portion of the historic Afognak Village site (DCRA 2025a). Aleneva is currently the only continuously occupied community on Afognak Island (DCRA 2025a). There were an estimated eight residents of Aleneva in 2025, and the population has been trending downward since it first appeared in the US Census in 2000 (**Table 3**). Aleneva residents speak Russian as a first language and adhere to traditional Russian Orthodox practices, while also engaging significantly in subsistence activities (DCRA 2025a) and commercial fishing (Rostad 2023). However, no subsistence surveys have been conducted for this community.

Harvesting traditional subsistence foods was important to the local culture and economy throughout the transition from Afognak Village to Port Lions, and it remains so today (Keating et al. 2026).

Commercial fishing and seafood processing have also been important industries in and around Port Lions since the community was established (Williams 2006a). However, like other communities in the area, participation and income received from commercial fishing has been declining along with the local population over the past few decades (**Table 3**, Keating et al. 2026). Employment in the service industry recently accounted for the largest proportion of Port Lions residents' wages (15%), followed by positions in local and Tribal government (14%), the agriculture, forestry, and fishing sector (9%), and manufacturing (7%) (Keating et al. 2026). Port Lions had an estimated population of 168 people in 2025 (ADLWD 2025). There is currently a K–12 rural school, public library, post office, gas station, airport, public dock, and several wilderness lodges in the community (Keating et al. 2026). The Alaska

Marine Highway ferry travels to Port Lions year-round, providing regular access to Kodiak City and Homer.

The most recent comprehensive subsistence survey was conducted in Port Lions for the 2022 harvest year (Keating et al. 2026). At this time, the average Port Lions household used about 12 different subsistence resources and harvested about 9 different resources (Keating et al. 2026). This equated to a total average harvest of about 434 pounds of wild resources per household, with salmon (44%), non-salmon fish¹ (31%), large land mammals² (14%), and vegetation³ (8%) accounting for most of this harvest (Keating et al. 2026). Salmon and non-salmon fish were the resources received by the greatest percentage of Port Lions households (69%), while vegetation (63%) and salmon (61%) were the resources reported as given away by the greatest percentage of households (Keating et al. 2026).

Sockeye and Coho salmon have been the primary salmon species harvested by Port Lions households in terms of weight since subsistence surveys began being conducted here in the early 1980s. This trend continued in the most recent survey, as Sockeye (42%), Coho (30%), and Chinook salmon (23%) were the primary species harvested by Port Lions households in 2022 (**Table 4**). About 76% of all Sockeye Salmon were harvested with subsistence net gear, while Coho Salmon were harvested with both subsistence net gear (36%) and rod and reel (26%) in 2022 (Keating et al. 2026). The majority of Chinook Salmon were harvested via trolling (73%), which typically requires more resources than other harvest methods (Keating et al. 2026). As Keating and colleagues (2026: 150) noted:

Salmon fishing locations in 2022 reflect the fact that few salmon species return to systems adjacent to the community of Port Lions. As one respondent explained, “We just don’t get the natural returns. There used to be a strong silver [coho salmon] return at the head of Settler Cove, and a couple pink runs, and we’re just seeing them disappear.” While households documented fishing around Port Lions in Settler Cove and through Kizhuyak Bay and into Whale Passage, they also fished on the northwest side of Spruce Island near Ouzinkie, in **Kazakof Bay**, and in Marmot Bay.

In 2022, most Port Lions households reported using less salmon than they had in the previous five years (60%), while 29% of households reported using about the same amount, and 12% of households reported using more salmon (Keating et al. 2026). Salmon was the only resource category where more than half of households reported using less than normal (Keating et al. 2026). Households’ most frequently cited reasons for using less salmon in 2022 were: the resource was less available (42%), working/no time (23%), and family/personal reasons (19%) (Keating et al. 2026).

Overall, the average Port Lions household harvested about 65 lbs. less salmon in 2022 than it did during the previous comprehensive survey conducted in 2003 (**Table 4**). The only time Port Lions households’ average salmon harvests were lower was in 1989, following the Exxon Valdez oil spill (**Table 4**). Similarly, the average total subsistence harvest by Port Lions households was about 165 lbs. lower in 2022 than it was during the previous study period (Williams 2006a). The diversity of

¹ Primarily halibut and cod (Keating et al. 2026).

² Primarily deer and elk (Keating et al. 2026).

³ Primarily berries (Keating et al. 2026).

subsistence resources used by Port Lions households in 2022 was also slightly lower than the levels reported in 2003, but the number of resources harvested was about the same⁴ (Williams 2006a). Declining harvests in Port Lions could be related to a number of factors, including: (1) the declining availability of salmon near the community, (2) the community's ageing population, (3) declining commercial fishing opportunities reducing home-pack harvest opportunities, and (4) the loss of high harvesting households due to age or relocation (see Keating et al. 2026).

Ouzinkie (*Uusenkaa*) is another community with a history of harvesting salmon from Kazakof Bay and other locations on or near Afognak Island (Williams 2006b, Keating et al. 2026). Ouzinkie is located on the northwest coast of Spruce Island, just across the Narrow Strait from Kodiak Island. Alutiiq peoples have resided in, and made their living from, the lands and waters in this area for thousands of years (Williams 2006b, Steffian 2024). However, the current site of Ouzinkie was initially established in the mid-1800s as a retirement community for employees of the Russian American Company and their families (Williams 2006b). Subsistence hunting and fishing, gardening, and cattle ranching were important economic activities during this initial period (Williams 2006b). Commercial fishing and fish processing became important aspects of the culture and economy after the first cannery was built here in 1889 (Keating et al. 2026). Unfortunately, like Afognak Village, Ouzinkie was greatly impacted by the 1964 Good Friday Earthquake and resulting tsunami (DCRA 2025b). The cannery and many other community structures were destroyed during this disaster (DCRA 2025b). The community recovered and a new cannery was built in the late 1960s, but it subsequently burned down in 1976, and there has not been a cannery in Ouzinkie since this time (DCRA 2025b). Commercial fishers in the area now depend on floating processors or other locations to sell their fish (Keating et al. 2026).

Ouzinkie had an estimated population of 102 people in 2025 (ADLWD 2025). There is no grocery store in town, but the community does have a post office, fire station, community hall, and health clinic (Keating et al. 2026). Many residents use the ferry to buy food and other commercial goods in Kodiak during the summer months (Keating et al. 2026). Residents also tend to have close ties that involve sharing subsistence resources with family and friends residing on the Kodiak road system or in other remote communities like Old Harbor and Port Lions (Keating et al. 2026). Like other remote communities, Ouzinkie's population has declined over the past several decades along with the waning commercial fishing industry (**Table 3**, Williams 2006b, Keating et al. 2026). In 2022, jobs in local and Tribal government accounted for the greatest proportion of Ouzinkie residents' wage-based income (29%), followed by employment in the services industry (14%) (Keating et al. 2026). Employment in the agriculture, forestry, and fishing sector only accounted for about 4% of Ouzinkie residents' total income at this time (Keating et al. 2026).

The most recent comprehensive subsistence survey was conducted in Ouzinkie in 2022 (Keating et al. 2026). At this time, the average Ouzinkie household used about 14 different subsistence resources and harvested about 10 different resources (Keating et al. 2026). This equated to a total average harvest of

⁴ The average Port Lions household used about 14 different subsistence resources and harvested about 8 different resources in 2003 (Williams 2006a).

about 586 pounds of wild resources per household, with salmon (65%), non-salmon fish⁵ (21%), vegetation⁶ (6%), and large land mammals⁷ (4%) accounting for most of this harvest (Keating et al. 2026). Salmon was the resource received by the greatest percentage of Ouzinkie households (76%), and it was the resource given away by the second greatest percentage of households (54%), trailing only vegetation (56%) (Keating et al. 2026).

Coho and Sockeye salmon have been the primary salmon species harvested by Ouzinkie households in terms of weight since subsistence surveys began in the early 1980s (**Table 4**). This trend held in the most recent survey, as Sockeye (64%), Coho (23%), and Pink salmon (7%) were the primary species harvested by Ouzinkie households in terms of weight in 2022 (**Table 4**). All these salmon species were primarily harvested with subsistence net gear (95%) (Keating et al. 2026). As Keating and colleagues (2026: 63) noted:

In 2022, Ouzinkie households fished for salmon directly from the shore lining the community of Ouzinkie and northwest into Marmot Bay, along the northern portion of Spruce Island near North Cape, throughout Narrow Strait between Spruce and Kodiak islands, north of Ouzinkie in Afognak, **Kazakof** (Danger), and Duck bays, as well as west of Ouzinkie in Dry Spruce Bay. One long-time resident described the benefit of the introduced salmon run near Ouzinkie Harbor, which provided more easily accessible salmon. He shared, “Before [the introduced run], we’d have to go back side of the island, North Cape ... A hit-or-miss supply there. But then when you’re out there you get a mixture of fish.

In 2022, roughly 49% of Ouzinkie households reported that they used about the same amount of salmon as they had in the previous five years, while 41% reported using less salmon, and 10% reported using more salmon (Keating et al. 2026). Households’ most frequently cited reasons for using less salmon in 2022 were: family/personal reasons (27%), working/no time (20%), lack of equipment (13%), did not need (13%), and unsuccessful harvest efforts (13%) (Keating et al. 2026).

Overall, Ouzinkie households’ average total salmon harvest was just slightly lower in 2022 than it was in previous surveys conducted in 2003, 2004, and 2005 (**Table 4**). However, Ouzinkie households’ average total subsistence harvests were about 385 lbs. lower in 2022 than they were during the previous comprehensive survey conducted in 2003 (Williams 2006b). The harvest of deer and non-salmon fish species like halibut, cod, char, and trout were all substantially lower in 2022 (Keating et al. 2026). Likewise, the diversity of subsistence resources used and harvested by Ouzinkie households in 2022 was also lower than the levels reported in 2003⁸ (Williams 2006b). Similar issues to those discussed for Port Lions could be impacting subsistence harvests in Ouzinkie too (Keating et al. 2026).

⁵ Primarily halibut, cod, and trout (Keating et al. 2026).

⁶ Primarily berries (Keating et al. 2026).

⁷ Primarily deer, but also some elk (Keating et al. 2026).

⁸ The average Ouzinkie household used about 25 different subsistence resources and harvested about 13–14 different resources in 2003 (Williams 2006b).

Table 3. Population estimates for Kodiak Island Borough communities 1990 to 2025 (ADLWD 2025).

Community	1990	2000	2010	2020	2025
Kodiak City	6,365	6,334	6,130	5,581	5,238
Mill Bay CDP	--	--	4,324	4,216	4,058
Kodiak Station CDP	2,025	1,840	1,301	1,673	1,524
Womens Bay CDP	620	690	719	743	759
Chiniak CDP	69	50	47	61	47
Balance*	3,220	3,991	266	203	216
<i>Total Road Accessible</i>	<i>12,299</i>	<i>12,905</i>	<i>12,787</i>	<i>12,477</i>	<i>11,842</i>
Akhiok	77	80	71	63	63
Aleneva CDP	--	68	37	5	8
Karluk CDP	71	27	37	27	31
Larsen Bay	147	115	87	34	30
Old Harbor	284	237	218	216	186
Ouzinkie	209	225	161	109	102
Port Lions	222	256	194	170	168
<i>Total Off-road</i>	<i>1,010</i>	<i>1,008</i>	<i>805</i>	<i>624</i>	<i>588</i>
Total Kodiak Island	13,309	13,913	13,592	13,101	12,430

*Balance refers to the estimated number of people residing outside of city or CDP boundaries. It is included with the road-accessible category under the assumption that most residents residing outside of an administrative area are located along the road system in the northeastern portion of Kodiak Island. However, there may be a small number of residents included in the balance estimate that reside in remote areas.

Table 4. Estimated household harvests of salmon by species in Ouzinkie and Port Lions, based on subsistence surveys conducted between 1982 and 2022 (Fall 2006, Williams et al. 2010, Keating et al. 2026, ADF&G CSIS 2026).

Community	Study Year	Sockeye Harvest (lbs.)	Coho Harvest (lbs.)	Pink Harvest (lbs.)	Chinook Harvest (lbs.)	Chum Harvest (lbs.)	Total Salmon Harvest (lbs.)
Ouzinkie	1982	200	215	50	9	104	577
Ouzinkie	1986	184	278	54	4	88	609
Ouzinkie	1989	12	69	10	1	1	93
Ouzinkie	1990	87	126	16	4	24	257
Ouzinkie	1991	91	172	15	2	34	315
Ouzinkie	1992	231	340	54	13	33	671
Ouzinkie	1993	113	180	23	2	14	333
Ouzinkie	1997	148	167	40	23	37	415
Ouzinkie	2003	150	184	27	15	27	402
Ouzinkie	2004	162	146	28	27	20	384
Ouzinkie	2005	146	172	37	14	16	386
Ouzinkie	2022	242	88	28	8	13	379
Average		147	178	32	10	34	402

Community	Study Year	Sockeye Harvest (lbs.)	Coho Harvest (lbs.)	Pink Harvest (lbs.)	Chinook Harvest (lbs.)	Chum Harvest (lbs.)	Total Salmon Harvest (lbs.)
Port Lions	1982	112	171	23	4	10	320
Port Lions	1986	156	253	51	53	15	527
Port Lions	1989	64	95	6	5	6	176
Port Lions	1993	199	213	31	10	10	464
Port Lions	2003	132	87	13	24	2	258
Port Lions	2004	138	174	8	54	5	379
Port Lions	2005	182	143	25	94	25	468
Port Lions	2022	81	58	6	44	3	193
Average		133	149	20	36	9	348

Harvest History

Coho Salmon populations support important Kodiak area subsistence, sport, and commercial fisheries. Based on State of Alaska subsistence surveys, the communities of Port Lions and Ouzinkie harvest salmon from Danger Bay, among other local areas. In 2022, Port Lions and Ouzinkie subsistence users reported average harvests of about 58 and 88 pounds of Coho Salmon per household, respectively (**Table 4**). Salmon were also the most widely received subsistence resource within community subsistence sharing networks, illustrating the importance of salmon to a subsistence way of life (Keating et al. 2026). Survey data also indicate that harvest levels and subsistence fishery participation rates have declined since the 1980s (**Table 4**; Keating et al. 2026). This trend points to long term reductions in subsistence harvest pressure on area Coho Salmon fisheries.

While most subsistence fishers harvest under State subsistence regulations, some do harvest under Federal regulations. After Sockeye, Coho Salmon are the second most frequently harvested fish by federally qualified users reporting under the Federal program, with a most recent 3-year average harvest rate of 50 fish per year (2023–25; **Table 6**). The average number of Danger Bay Coho Salmon harvested by Federally qualified users for the same timeframe was 15 fish per year. OSM permit records show that all Danger Bay Coho Salmon were taken by rod and reel. In comparison, all Buskin River Coho Salmon harvest permits report the use of gill nets (OSM 2026).

Based on harvest records, regional commercial fisheries exert the greatest pressure on Kodiak area Coho Salmon, followed by State subsistence and sportfish (**Table 5**). In 2023, 7,380 commercially caught Coho Salmon were retained for personal use as “home-pack” (Anderson et al. 2023a). While fishers harvesting under Federal regulations comprised the smallest group targeting Coho Salmon, the combined State and Federal average annual subsistence harvests exceed sportfish harvest by about 47%. Many fishers harvest under State regulations due to overlapping jurisdiction, lack of familiarity with the Federal program, and issues associated with Federal or surrogate State permit acquisition (**Table 5**). Sport fish harvest is estimated through the Alaska Sport Fishing Harvest Survey. However, there are no salmon harvest estimates specific to Danger Bay due to low response rates (Polum et al. 2023).

Table 5. Kodiak area Coho Salmon harvest from 2018–22. State and Federal Subsistence Harvest is shown for the Kodiak Management Area. Sport (Afognak Island aggregate) and Commercial (area 252-33 which includes Afognak and Danger bays) are more regionally focused (Polum et al. 2023; Anderson et al. 2019a, 2019b; Anderson et al. 2023a, 2023b, 2023c, 2023d; OSM 2026).

Year	Sport	Commercial	State subsistence	Federal Subsistence
2018	845	438,065	3,241	0
2019	4,594	393,812	2,396	0
2020	796	441,353	2,803	79
2021	1,185	306,495	2,075	0
2022	1,248	88,293	1,865	40
Average	1,332	333,604	2,476	24

Federal subsistence harvest trends were examined for Danger Bay as well as the Kodiak area excluding Danger Bay. Harvest summaries are based on Federal subsistence permit reporting. The latter geography is referred to herein as the “Kodiak Area Remainder” (**Table 6**). The number of Kodiak Area Remainder harvest reports show little variation over time (**Table 5**). Danger Bay salmon harvest, on the other hand, has increased in recent years. A noticeable uptick in permits reporting harvest at Danger Bay occurred in 2025, with most fishers reporting Chinook Salmon harvest. A record number of Chinook Salmon were harvested from the Kodiak Area in 2025, with over 90% of the catch coming from Afognak (6 fish) and Danger bays (81 fish). The highest reported Danger Bay Coho Salmon harvest also took place in 2025. In the case of both Chinook and Coho salmon, all fish were harvested with rod and reel.

Table 6. Report of Federal subsistence Chinook and Coho salmon harvest from Danger Bay (DB) and Kodiak Area Remainder (K) for the years 2022–25. Number of Federal subsistence permit reports (reports) returned by geography are also shown.

Year	K Coho	K Chi-nook	K reports	DB Coho	DB Chi-nook	DB reports
2016	75	7	21	0	13	4
2017	57	0	29	0	0	0
2020	79	0	19	0	0	0
2021	0	0	3	0	24	2
2022	28	7	7	12	0	1
2023	26	0	4	0	7	1
2024	66	3	21	21	3	2
2025	58	14 ^a	29	25	81	32 ^b
Average	49	4	17	7	16	5

^a Six of 14 Kodiak remainder Chinook Salmon were harvested from Afognak Bay

^b Three of 32 permits report Coho Salmon harvest

In 2024, Afognak Bay harvest reports increased coincident with a 2023 decision to rescind a Federal fisheries closure of the same area (FCR21-18; **Figure 3**). Reported Federal harvest again dropped off after regulations changed to limit Afognak Federal subsistence fishery methods and means to rod and

reel (FP25-05). The increase in 2025 Danger Bay Federal permit harvest reports correlates with this decrease in Afognak Bay reported harvest.

More conservative Afognak Bay regulations may have encouraged federally qualified subsistence users to shift their use to Danger Bay. However, the two bays support very different fisheries. Afognak Bay and its inlet stream are targeted for Sockeye Salmon, the most harvested subsistence salmon species (Anderson 2023, Keating et al. 2026, OSM 2026). Danger Bay, on the other hand, supports Coho and Chum salmon populations, and provides a favorable vantage point for targeting Chinook Salmon. If Afognak Bay harvest pressure was deferred to neighboring Danger Bay, one would expect to see reports of harvest by nets. However, all Federal harvest reported for Danger Bay took place with rod and reel (OSM 2026). It is possible that Federal closure review outreach drew attention to this area and the Federal Subsistence Management Program, resulting in increased program participation.

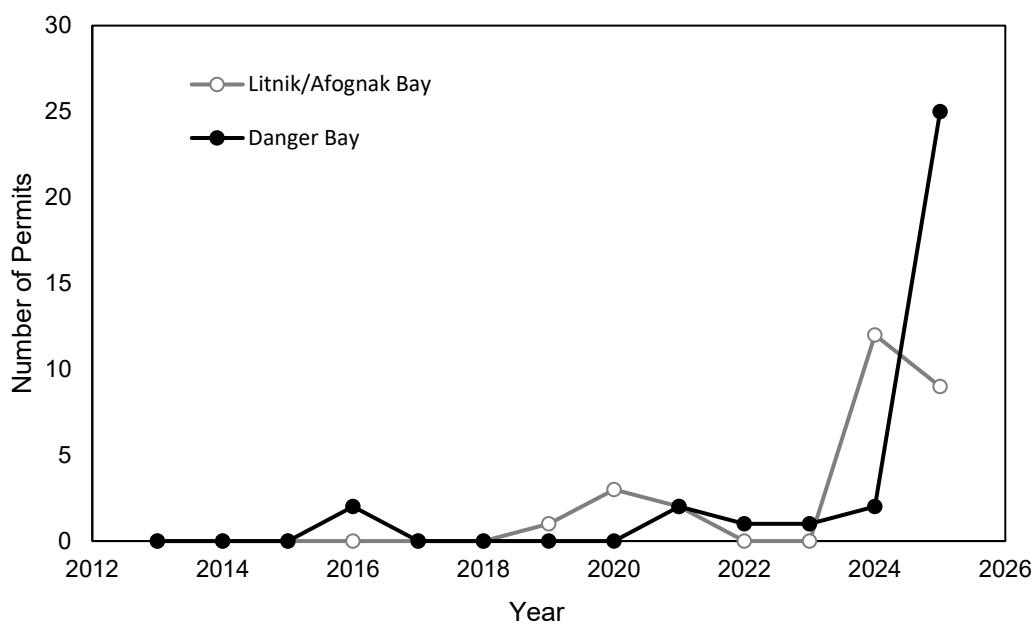


Figure 3. Number of Federal subsistence permits issued with harvest reported at Litnik/Afognak and Danger bays between 2013 and 2025.

Effects of the Proposal

This proposal is not likely to affect Coho Salmon populations in the marine waters or inlet tributaries of Danger Bay. Among local communities, the harvest and sharing of salmon from Danger Bay has been an important subsistence practice for thousands of years. In recent decades, the continuation of these practices has not resulted in increased harvest pressure on area fisheries. In fact, participation in the subsistence fishery has declined. Local knowledge and regional escapement surveys indicate that Coho Salmon populations fluctuate. However, exploitation of Danger Bay Coho Salmon by federally qualified subsistence users is low relative to Kodiak area wide Federal subsistence. Additionally, all Danger Bay salmon harvested under Federal permits to date have been taken by rod and reel, which would be allowable under this proposal. While the proponent focuses on conservation protections for

Coho Salmon, harvest data reveal that subsistence fishers may actually target this area for Chinook Salmon. Regardless, should future conservation, subsistence use continuity, or public safety concerns arise tied to use of nets in Danger Bay, the Federal in-season manager may issue emergency and temporary special actions for the fishery such as stipulating gear types or setting harvest limits. (**Appendix 1**).

OSM PRELIMINARY CONCLUSION

Oppose Proposal FP27-05.

Justification

Based on reported harvest rates, subsistence use is nominal and unlikely to affect Danger Bay Coho Salmon populations. Federal permit records do not indicate that subsistence users are targeting Danger Bay specifically for Coho Salmon. Additionally, when subsistence harvest does occur, it is by rod and reel. According to Title VIII, section 804 of ANILCA, "...the taking on public lands of fish and wildlife for nonwasteful subsistence uses shall be accorded priority over taking on such lands of fish and wildlife for other purposes." Continuing to allow subsistence users to harvest Danger Bay salmon with nets would maintain a meaningful, albeit currently unexercised, priority over sport fishers. While current harvest rates do not necessitate regulatory change, the Federal in-season manager may issue special actions if short term harvest concerns arise. Actions the manager can take include stipulating gear types and setting limits to promote conservation, continue subsistence uses, or to maintain public safety (**Appendix 1**). Another proposal may be submitted if future harvest levels become unsustainable.

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APPENDIX 1

Delegation of authority letter to the in-season manager of the Kodiak Area.



FISH and WILDLIFE SERVICE
BUREAU of LAND MANAGEMENT
NATIONAL PARK SERVICE
BUREAU of INDIAN AFFAIRS

Federal Subsistence Board

1011 East Tudor Road, MS 121
Anchorage, Alaska 99503-6199



FOREST SERVICE

In Reply Refer To:
OSM.23048

MAY 12 2023

Refuge Manager
U.S. Fish and Wildlife Service
Kodiak National Wildlife Refuge
1390 Buskin River Road
Kodiak, Alaska 99516

Dear Kodiak National Wildlife Refuge Manager:

This letter delegates specific regulatory authority from the Federal Subsistence Board (Board) to the Manager of the Kodiak National Wildlife Refuge (Refuge Manager) to issue emergency and temporary special actions (special actions) when necessary to ensure the conservation of a healthy fish population, to continue subsistence uses of fish, for the continued viability of a fish population, or for public safety reasons. This delegation only applies to Federal public waters subject to the Alaska National Interest Lands Conservation Act (ANILCA) Title VIII in the Kodiak Area.

It is the intent of the Board that Federal subsistence fisheries management by designated Federal officials be coordinated, prior to implementation, with the representatives from Regional Advisory Councils (Councils), the Office of Subsistence Management (OSM), and the Alaska Department of Fish and Game (ADF&G), to the extent possible. Managers will use OSM to ensure proposed actions are technically and administratively aligned with legal mandates and policies and to facilitate communication of actions. Federal managers are expected to work with managers from the State and other Federal agencies, the Council Chair(s) and applicable Council members, local tribes, and Alaska Native Corporations to minimize disruption to resource users and existing agency programs, consistent with the need for emergency special action.

DELEGATION OF AUTHORITY

1. Delegation: The Refuge Manager is hereby delegated authority to issue special actions affecting fisheries in Federal public waters as outlined under the Scope of Delegation below. A public hearing is required before implementing a temporary special action. A public hearing is recommended for an emergency special action, but it is not required. Special actions are governed by regulation at 36 CFR 242.19 and 50 CFR 100.19.

2. Authority: This delegation of authority is established pursuant to 36 CFR 242.10(d)(6) and 50 CFR 100.10(d)(6), which state: “The Board may delegate to agency field officials the authority to set harvest and possession limits, define harvest areas, specify methods or means of harvest, specify permit requirements, and open or close specific fish or wildlife harvest seasons within frameworks established by the Board.”

3. Scope of Delegation: The regulatory authority hereby delegated is limited to the issuance of special actions as defined by 36 CFR 242.19 and 50 CFR 100.19. An emergency action may not exceed 60 days and may not be extended through another emergency special action. A temporary special action may exceed 60 days but may not extend beyond the end of the current fisheries regulatory cycle.

This delegation permits you to issue special actions to open or close Federal subsistence fishing periods or areas provided under codified regulations, to specify methods and means, and to set harvest and possession limits for Federal subsistence fisheries.

This delegation also permits you to issue special actions to close and re-open Federal public waters to non-subsistence fishing, but it does not permit you to specify methods and means, permit requirements, or harvest and possession limits for State-managed fisheries.

This delegation may be exercised only when it is necessary to conserve healthy fish populations, to continue subsistence uses, for reasons of public safety, or to ensure the continued viability of populations.

You are also permitted to specify permit conditions outside of the special action process, provided those permit conditions do not already appear in regulation, are not related to the take of fish, and are not related to areas or periods open to fishing. Permit conditions are not a substitute for the public process to generate regulations regarding take. You may not collect additional information from the public that has not been approved by the Office of Management and Budget (OMB).

All other proposed changes to codified regulations, such as customary and traditional use determinations, shall be directed to the Board.

The Federal public waters subject to this delegated authority are those within the Kodiak Area (as described in the Subsistence Management Regulations for the Harvest of Fish and Shellfish on Federal Public Lands and Waters in Alaska). You will coordinate all local fishery decisions with all affected Federal land managers.

4. Effective Period: This delegation of authority is effective from the date of this letter and continues until superseded or rescinded.

5. Guidelines for Review of Proposed Special Actions: You will use the following guidelines to determine the appropriate course of action when reviewing proposed special actions.

- a) Does the proposed special action fall within the geographic and regulatory scope of delegation?
- b) Have you communicated with OSM to ensure the special action is aligned with ANILCA Title VIII, Federal subsistence regulations, and policy?
- c) Does the proposed action need to be implemented immediately as a special action, or can the desired conservation or subsistence use goal be addressed by deferring the issue to the next regulatory cycle?
- d) Does the supporting information in the proposed special action substantiate the need for the action?
- e) Are the assertions in the proposed special action confirmed by available current biological information and/or by affected subsistence users?
- f) Is the proposed special action supported in the context of available historical information on stock status and harvests by affected users?
- g) Is the proposed special action likely to achieve the expected results?
- h) Have the perspectives of the Chair or alternate of the affected Council(s), OSM, and affected State and Federal managers been fully considered in the review of the proposed special action?
- i) Have the potential impacts of the proposed special action on all affected federally qualified subsistence users and non-federally qualified users within the drainage been considered?
- j) Can public announcement of the proposed special action be made in a timely manner to accomplish the management objective?
- k) After evaluating all information and weighing the merits of the special action against other actions, including no action, is the proposed special action reasonable, rational, and responsible?

6. Guidelines for Delegation: You will become familiar with the management history of the fisheries in the region and be up to date with State and Federal regulations, management plans, and stock status and harvest status information.

You will provide subsistence users in the region a local point of contact about Federal subsistence fishery issues and regulations and facilitate a local liaison with State managers and other user groups.

Consultation is not always possible for in-season management decisions and special actions; however, to the extent practicable, communication with stakeholders will take place before decisions are implemented. You will also establish meaningful and timely opportunities for government-to-government consultation related to pre-season and post-season management actions as established in the Board's Government to Government Tribal Consultation Policy (Federal Subsistence Board Government to Government Tribal Consultation Policy 2012 and Federal Subsistence Board Policy on Consultation with Alaska Native Claims Settlement Act Corporations 2015).

You will review special action requests or situations that may require a special action and all supporting information to determine (1) consistency with 36 CFR 242.19 and 50 CFR 100.19, (2) if the request/situation falls within the scope of your delegated authority, (3) if significant conservation problems or subsistence harvest concerns are indicated, and (4) what the consequences of taking an action or no action may be on potentially affected subsistence uses and non-subsistence uses. Requests not within your delegated authority will be forwarded to the Board for consideration.

You will maintain a record of all special action requests and justification of your decisions. A copy of this record will be provided to the Administrative Records Specialist at OSM no later than 60 days after development of the document.

You will immediately notify the Board through the Assistant Regional Director for OSM, and coordinate with the Chair or alternate of the affected Council(s), local ADF&G managers, and other affected Federal conservation unit managers concerning emergency special actions being considered.

If the timing of a regularly scheduled meeting of the affected Council(s) permits without incurring undue delay, you may seek Council recommendations on the proposed special action. If the affected Council(s) provided a recommendation, and your action differs from that recommendation, you will provide an explanation in writing in accordance with 50 CFR 100.10(e)(1) and 36 CFR 242.10(e)(1).

You will issue decisions in a timely manner. Before the effective date of any decision, reasonable efforts will be made to notify Council representatives, the public, OSM, affected State and Federal managers, and law enforcement personnel. If an action is to supersede a State action not yet in effect, the decision will be communicated to Council representatives, the public, OSM, and State and Federal managers at least 24 hours before the State action would be effective. If a decision to take no action is made, you will notify the proponents of the request immediately.

You may defer a special action request, otherwise covered by this delegation of authority, to the Board when the proposed management action will significantly impact a large number of Federal subsistence users or is particularly controversial. These options should be exercised judiciously and only when sufficient time allows. Such deferrals should not be considered when immediate management actions are necessary for conservation purposes. The Board may determine that a special action request may best be handled by the Board, subsequently rescinding the delegated authority for the specific action only.

7. Reporting: You must provide to the Board, through the Assistant Regional Director for OSM, a report describing the pre-season coordination efforts, local fisheries management decisions, and post-season evaluation activities for the previous fishing season by November 15. A summary of

special action requests and your resultant actions must be provided to the coordinator of the appropriate Council(s) at the end of the calendar year for presentation during regularly scheduled Council meetings.

Should you have any questions about this delegation of authority, please feel free to contact the Assistant Regional Director for OSM at toll-free 1-800-478-1456 or (907) 786-3888.

Sincerely,



Anthony Christianson
Chair

Enclosure: Map of the Kodiak Area

cc: Federal Subsistence Board
Office of Subsistence Management
Kodiak/Aleutians Subsistence Regional Advisory Council
Bristol Bay Subsistence Regional Advisory Council
Manager, Kodiak National Wildlife Refuge
Manager, Alaska Maritime National Wildlife Refuge
Special Agent In Charge, Law Enforcement, U.S. Fish and Wildlife Service (Region 7)
Deputy Commissioner, Alaska Department of Fish and Game
Interagency Staff Committee
Administrative Record