

FEDERAL FISHERIES CLOSURE REVIEW

FCR27-04

Issue

FCR27-04 is a routine review of a Federal fishery closure to salmon fishing in the Unalaska Lake drainage (**Figure 1**). It is the Federal Subsistence Board's (Board) policy that Federal public lands and waters should be reopened as soon as practicable once the conditions that originally justified the closure have changed to such an extent that the closure is no longer necessary. The purpose of this closure review is to determine if the closure is still warranted and to ensure the closure does not remain in place longer than necessary.

Closure Location and Species: Unalaska Lake drainage—Salmon

Current Federal Regulation

§ __.27(e)(6) *Aleutian Islands Area*

(iv) *You may not subsistence fish for salmon in the following waters:*

(A) *The waters of Unalaska Lake, its tributaries and outlet stream;*

Relevant Federal Regulations

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

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

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

§ __.27 *Subsistence taking of fish*

(b) *Methods, means, and general restrictions.*

(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.

(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.

§ __.27(e)(6) Aleutian Islands Area

(ii) In the Unalaska District, you may take salmon for subsistence purposes from 6:00 a.m. until 9:00 p.m. from January 1 through December 31.

(v) You may take fish by net in freshwater on Adak and Kagalaska islands.

(vi) In the Unalaska District, if you fish with a net, you must be physically present at the net at all times when the net is being used.

(vii) A subsistence fishing permit is necessary to fish for salmon, trout, and char, except that you do not need a permit in the Akutan, Umnak, and Atka-Amlia Islands Districts.

(viii) You may take no more than 250 salmon for subsistence, except that in the Unalaska and Adak Districts, you may take no more than 25 salmon plus an additional 25 salmon for each member of your household listed on the permit. You may obtain an additional permit.

Note: In the Unalaska District, all users are required to have a State Subsistence Fishing Permit when subsistence fishing for salmon (**Appendix 1**, see 5 AAC 01.380. Subsistence fishing permits).

Closure Dates: Year-round

Current State Regulations

Subsistence Regulations

Aleutian Islands Area

5 AAC 01.370. Lawful gear and gear specifications

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

(d) In the Unalaska District, a subsistence permit holder fishing with a net must be physically present at the net at all times when the net is being used for fishing.

5 AAC 01.375 Waters closed to subsistence fishing

The following waters are closed to subsistence fishing for salmon:

(1) waters of Unalaska Lake (at the city of Unalaska), its tributaries and outlet stream, and waters between Unalaska and Amaknak Islands, including Margaret's Bay, west of a line from the "Bishop's House" at 53_ 52.64' N. lat., 166_ 32.30' W. long. to a point on Amaknak Island at 53_ 52.82' N. lat., 166_ 32.13' W. long., and north of line from a point south of Agnes Beach at 53_ 52.28' N. lat., 166_ 32.68' W. long. to a point at 53_ 52.35' N. lat., 166_ 32.95' W. long. on Amaknak Island;

5 AAC 01.380. Subsistence fishing permits

(a) Salmon, trout, and char may be taken only under the terms of a subsistence fishing permit, except that a permit is not required in the Akutan, Umnak, and Atka-Amlia Islands Districts.

(b) No more than 250 salmon may be taken for subsistence purposes unless otherwise specified on the subsistence fishing permit, except that in the Unalaska and Adak Districts,

(1) the holder of a subsistence salmon fishing permit may take no more than 25 salmon, of which no more than 10 sockeye salmon may be harvested from

Front Beach in Unalaska Bay, plus an additional 25 salmon for each member of the same household whose name is listed on the permit, of which no more than 10 sockeye salmon may be harvested from Front Beach in Unalaska Bay; in this section, "Front Beach" means all Unalaska Bay waters south of a line from a point near the Bishop's House at 53°E/CS> 52.64' N. lat., 166°E/CS> 32.30' W. long., to a point on the Unalaska Bay shore at 53°E/CS> 52.68' N. lat., 166°E/CS> 30.91' W. long;

(2) a permit holder may obtain an additional permit from the department to harvest more salmon other than sockeye salmon from Front Beach in Unalaska Bay.

(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.

Sport Regulations

Alaska Peninsula and Aleutian Islands Area

5 AAC 65.022. Special provisions for bag, possession, and annual limits, and methods and means in the Alaska Peninsula and Aleutian Islands Area

(e) In the salt waters and all freshwater drainages of Unalaska Bay, the bag and possession limit for salmon, other than king salmon, is five fish per day, five fish in possession, of which no more than two fish may be coho salmon and two fish may be sockeye salmon.

5 AAC 65.051. Waters closed to sport fishing in the Alaska Peninsula and Aleutian Islands Area

(4) the following areas on and around Unalaska Island are closed to sport fishing as follows:

(a) the Iliuliuk River drainage, including Iliuliuk Creek (also known as Town or Unalaska Creek), Iliuliuk [Unalaska] Lake, and all waters flowing into Iliuliuk Lake,

(i) is closed to sport fishing for sockeye salmon;

(ii) upstream from ADF&G regulatory markers located at the Church Hole [in Unalaska Creek], is closed to sport fishing for salmon;

Regulatory Year Initiated: 2001

Extent of Federal Public 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. Federal public waters comprise Unalaska Lake (also known as Iliukiuk Lake) and its tributaries and outlet streams, which are within and adjacent to the exterior boundaries of the Alaska Maritime National Wildlife Refuge (**Figure 1** and **Figure 2**).

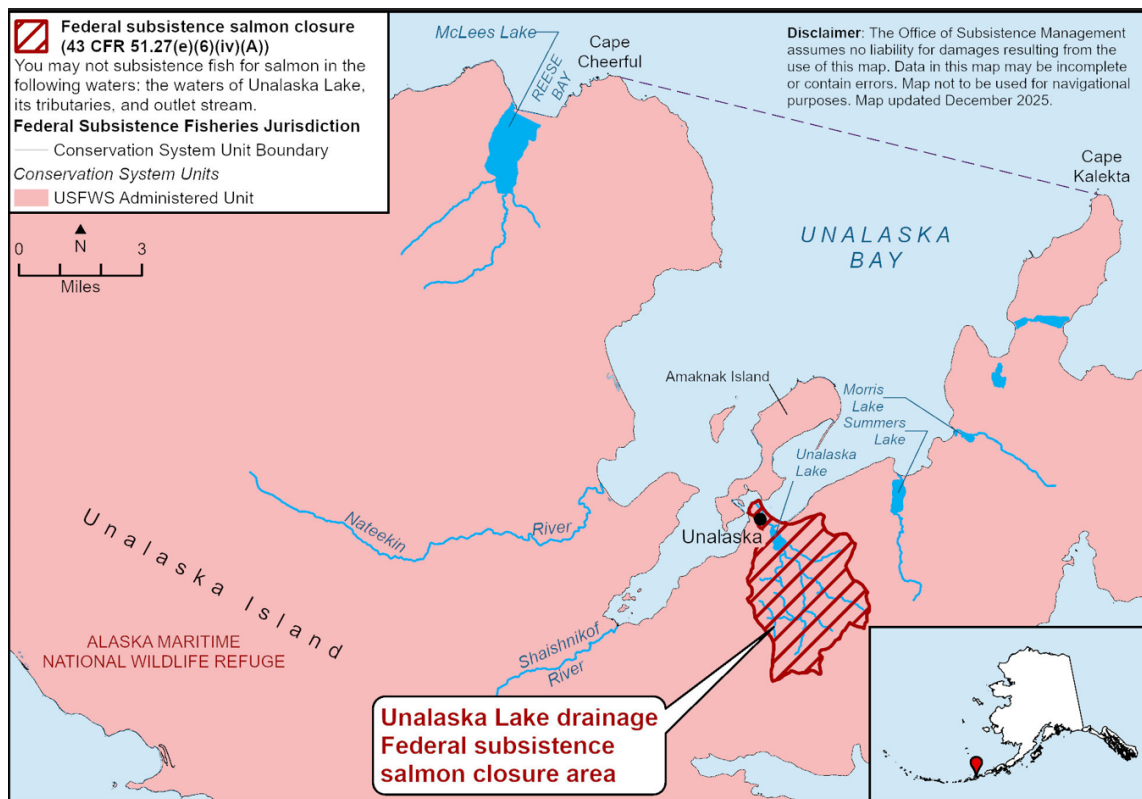


Figure 1. Map showing Unalaska (Iliuliuk) Lake drainage closure and external boundaries of the Alaska Maritime National Wildlife Refuge. This map should not be referenced for landownership.



Figure 2. Aerial image of Unalaska (Iliuliuk) Lake. Photo courtesy of Andy Dietrick, Aleutian Aerial LLC.

Customary and Traditional Use Determination

Residents of the Aleutian Islands Area and the Pribilof Islands have a customary and traditional use determination for all fish in the Aleutian Islands Area.

Regulatory History

In 1991, the Federal Subsistence Management Program adopted final temporary regulations for the harvest of fish for subsistence uses in non-navigable waters within and adjacent to the exterior boundaries of Federal public lands. These regulations incorporated many provisions from State of Alaska subsistence fishing regulations, “These temporary regulations attempt throughout to limit change from the State regulations to that necessary to fulfill the Secretaries’ responsibilities pursuant to title VIII” (56 Fed. Reg. 123, 29311 [June 26, 1991]). A State closure to “Unalaska Lake, its drainage and outlet streams and within 500 yards of its terminus,” effective 1968 (ADFG 1968) was preserved in these temporary Federal subsistence regulations.

In 1992, the Federal Subsistence Board (Board) adopted final regulations for fish management that did not include the closure to Unalaska Lake, effectively rescinding the closure (57 Fed. Reg. 103, 22564 [May 28, 1992]). In 1997, language mirroring the State’s 1968 to present closure of Unalaska Lake drainage to subsistence fishing (5AAC 01.375) was included in the proposed rule for the management of fish in navigable waters. The justification was that “The proposed wording of these sections is based on the existing State subsistence regulations with some exceptions” (62 Fed. Reg. 242, 66220 [December 17, 1997]). The Federal Subsistence Board began implementing revised Federal regulations for subsistence fishing in navigable waters in 1999 (64 Fed. Reg. 5, 1307), and in February of 2001,

adopted regulations closing Federal subsistence salmon fishing throughout the Iliuliuk River drainage (66 Fed. Reg. 30, 10154 [February 13, 2001]).

In 2020, the Kodiak Aleutian Subsistence Regional Advisory Council (Council) reviewed the Federal subsistence closure and recommended that the matter be deferred until the 2023 meeting cycle to allow for additional time for community input (KARAC 2020: 59-61). In alignment with Council recommendations, the Board deferred FCR21-08 at their 2021 fisheries regulatory meeting.

In 2023, deferred Fisheries Proposal FCR21-08 was on the Federal Subsistence Board meeting consensus agenda; the Board retained the status quo in deference to the Council's fall 2022 recommendation. The Council's decision was informed by community-voiced conservation concerns tied to liberal harvest, inopportune timing of closure review and fisheries regulations cycles that would have delayed area conservation regulations proposals for two years, and a lack of local law enforcement presence (KARAC 2022: 295-296).

Closure Last Reviewed: 2023 – FCR21-08

Justification for Original Closure

The original Unalaska Lake drainage Federal subsistence fishery closure maintained existing State subsistence fisheries regulations due to the limited availability of fisheries population and community use data (66 Fed. Reg. 30, 10154 [February 13, 2001]).

Council Recommendation for Original Closure

None

State Recommendation for Original Closure

None

Biological Background

This system supports Coho, Pink, and Sockeye salmon and Dolly Varden (Giefer and Evers 2025). Unalaska Sockeye Salmon runs have declined since the mid- to late-1980s (Holmes 1997), and the permanent closure of State subsistence fishing on Unalaska Lake in 1968 shifted subsistence fishing effort toward Reese Bay and the McLees Lake watershed (Holmes 1998).

Historical escapement data for smaller Unalaska systems is not readily available and often comes with the caveat of poor timing, visibility, or accessibility due to weather conditions and remote survey costs (Holmes 1998, Keyse et al. 2024). The State of Alaska has been monitoring indexed escapement at Unalaska Lake since 1979 through a variety of methods including visual encounter surveys, aerial drone surveys, and most recently a weir at the mouth of Unalaska Lake (Keyse et al. 2024).

Aerial surveys were conducted from 2018–2023 to enumerate salmon in Unalaska road system drainages using drones (Lawson 2020; Fox et al. 2020, 2021, 2022; Keyse et al. 2024). The surveys,

conducted by Aleutian Aerial LLC and funded by the Unalaska Native Fisherman's Association, the Ounalashka Corporation, and the City of Unalaska, were commissioned out of concern for the lack of escapement estimates for Sockeye Salmon on the Unalaska Island road system. The footage was provided to the Alaska Department of Fish and Game (ADF&G) for review and run size estimation. The ADF&G also provided feedback for aerial video monitoring method improvement for future survey efforts.

In 2024, a weir was installed at the mouth of Unalaska Lake and operated by the Qwalangin Tribe of Unalaska in cooperation with the ADF&G Division of Commercial Fisheries (Alaska Fish Count database, November 18, 2025). Cumulative counts for 2025 Sockeye Salmon escapement as of July 31 were 2,441, appreciably higher than previous years' drone indexed estimates (**Table 1**).

Recent drone and weir surveys specifically targeted enumeration of Sockeye Salmon, which are not available for legal harvest through State sport fish regulations (Alaska Sport Fishing Survey database 1996-present, Keyse et al. 2024). Information on the Coho Salmon fishery is limited, which impacts evaluation of potential conservation concerns associated with fishing pressure. Since 2018, minimum escapements (**Table 1**) indicate that the runs for each salmon species in Iliuliuk Creek (Unalaska Lake outlet stream) are very small. However, the 2025 uptick in Sockeye Salmon numbers could indicate either a population rebound or, more likely, discrepancy between aerial indexing and weir count methodologies.

Compounding small run sizes, Unalaska Lake has also experienced habitat loss. Observers recorded substantial erosion and siltation of this system as identified by the brown colored shallow water at the head of the lake in **Figure 2**. Heavy siltation over decades may have eliminated some Sockeye Salmon shore spawning habitat.

Table 1. Minimum salmon escapements at Unalaska Lake in 2018-2023, based on aerial drone surveys. Surveys did not include all habitat used by Pink Salmon and were not conducted during the peak of Coho Salmon abundance (Lawson 2020, Keyse et al. 2024). Iliuliuk weir count data are included for 2025 (Alaska Fish Count database, November 26, 2025).

Year	Sockeye Salmon	Pink Salmon	Coho Salmon
2018	583	605	21
2019	350	25	-
2020	815	1,150	-
2021	540	515	-
2022	115	35,080	-
2023	807	1,747	-
2025 ^a	2,441	-	-

^a 2025 Sockeye escapement estimate is based on data collected from the Iliuliuk weir.

Cultural Knowledge and Traditional Practices

The Aleutian Islands and Pribilof Islands are located west of the Alaska Peninsula and are the homelands of the Unanga̋, or Aleut, peoples.¹ As of 2024, there were an estimated 6,534 people living in eight communities within the region (ADLWD 2024). It is common for residents in the region to recognize a mixed Unanga̋/Aleut, Russian, and European heritage (Reedy-Maschner 2010). Archaeological and ethnographic evidence indicates that people have been practicing subsistence in this region for at least 9,000 years (West et al. 2007, Corbett and Hanson 2023).

Harvesting wild resources has been, and continues to be, central to Unanga̋/Aleut identity, culture, and economy. Ethnohistorical data demonstrate that traditional ecological knowledge about natural resources, trophic relationships, and climate has been passed down over generations (Sepez and Hunn 2010, Maschner et al. 2014). Key subsistence resources have included salmon, Pacific Halibut, cod, sculpins, greenling, cetaceans, sea otter, seals, sealions, shellfish, shorebirds, and waterfowl (Dumond and Bland 1995, Byers et al. 2011, Krylovich et al. 2019). These resources are customarily shared widely and were also used as trade items among residents to gain social status and prestige (Reedy-Maschner 2010).

The Aleutian and Pribilof islands have a long history of tumultuous cultural and socio-economic change (Reedy-Maschner 2010). The mid-1700s was a period defined by disease, high mortality, and social reorganization following Russian and European contact. Russians forced Unanga̋/Aleut people to relocate to the Pribilof Islands to sustain the fur seal industry, which continued with U.S. support after the purchase of Alaska in 1867. The western Aleutian Islands were occupied by the Japanese

¹ Unanga̋ refers to the Native people of the Aleutian region as a whole. “In the dialect of the eastern Aleutian Islands, the self-given term for this group of Native peoples is Unangan; in the western dialect, Unangas” (Qawalangin Tribe of Unalaska 2025). In this analysis, the term Unanga̋ is used when referring to the people of the Aleutian region as a whole, and the term Unangan is used when referring specifically to residents of Unalaska Island.

during World War II, at which point the U.S. government forced many residents of the eastern Aleutian Islands to evacuate to internment camps in southeast Alaska (Kohlhoff 1999 in Reedy-Maschner and Maschner 2012).

Most communities were reestablished following the end of the war, with commercial fishing and subsistence harvesting becoming economic mainstays once again (ADCCED 2024). However, a substantial number of the previously evacuated residents of these communities chose not to return (ADCCED 2024). Still, people across the region continue to practice and value a subsistence way of life, with the combination of subsistence and commercial fishing forming a key basis for the maintenance of “individual identity, social relationships, collective identity” and livelihood (Reedy-Maschner 2010: 242). Commercial fisheries in the region—particularly those on Akutan, Unalaska, and the Pribilof islands—tend to be exceptionally productive and also bring in many nonlocal employees (Reedy-Maschner 2010, Schmidt and Berman 2018).

Unalaska Bay is rich in pre-contact archaeological sites, evidence for the deep history of Unangan/Aleut presence in the area (Veltre and Veltre 1982). The settlement of Unalaska was previously known by the Unangan term “Iluulux” or “Illuulax”, which referred to “going half circle,” the curved approach taken in a boat when approaching the area (NPS 2015, Hudson 2025). This was later adopted into Russian as “Iliuliuk” (Hudson 2025). Unalaska became an important administrative center during the Russian period (Veltre and Veltre 1982). The community was one of multiple original settlements on Unalaska Island prior to the mid 20th century (Veltre and Veltre 1982, Hudson 2025).

Today, the city of Unalaska is the largest in the Aleutian Islands. The Port of Dutch Harbor is situated on adjacent Amaknak Island and is connected to Unalaska by a strip of road bridging the South Channel. This port city supports one of the largest commercial fisheries in the world. In 2024, Unalaska City (including Dutch Harbor) had an estimated population of 4,120, greater than the population of all other communities in the region combined (ADLWD 2024). This estimate was based on the 2020 U.S. Census, which counts people at their “usual residence” (U.S. Census Bureau 2020). People living in workers’ residential facilities who did not claim a usual residence elsewhere were counted as residents for the purposes of the Unalaska census. As context for assessing the number of permanent residents, in “Subsistence Fisheries Harvest Assessment and Traditional Ecological Knowledge, Lower Alaska Peninsula and Aleutian Islands,” Davis (2005) listed the population of Unalaska in 2000 as 2,091 people, less than half that of the 2000 census (4,283). Davis specifically excluded any group quarter residents.

Unalaska Lake is easily accessible from the community and has been impacted by the local population over time. Information gathered by Veltre and Veltre (1982) indicates that prior to World War II, Unalaska Creek had a larger run of Sockeye Salmon, and some seining took place in Unalaska Lake. During and after the war, Unalaska Creek was reportedly blue-stoned (likely treated with copper sulfate, destroying algae and fish runs). In the late 1970s to early 1980s, the Unalaska Creek run declined to an estimated 100 fish (Veltre and Veltre 1982).

The Unalaska District is one of six subsistence fishery management districts in the Aleutian Islands Area. A State subsistence fishing permit is required for salmon in the Unalaska District; this also applies to those fishing under Federal subsistence regulations. These permits can only be obtained in person at the ADF&G Dutch Harbor Office (Brown et al. 2023). Commercially caught fish may be retained for subsistence use in the Unalaska District. This harvest is not captured in returned permits. However, the commercial fishery in the area is primarily for shellfish and groundfish rather than salmon, and a relatively small percentage of salmon for home use are derived from commercial harvest (Brown et al. 2023).

According to Brown et al. (2023), managers' confidence that the permit system accurately represents actual harvest has declined, in part due to lack of local enforcement. Local residents have likewise expressed concern about lack of enforcement (Davis 2005, Brown et al. 2022, Keating et al. 2022). A key informant interviewed by Division of Subsistence reported concerns about depletion of Sockeye Salmon in Unalaska Lake due to people overfishing in large boats off the Front Beach (Keating et al. 2022). The Council has also discussed salmon conservation concerns, and the desire for greater law enforcement presence to address those concerns. At the fall 2022 Council meeting, the Council member from Unalaska stated:

On the Front Beach as far as subsistence goes, you know, we've got some families that traditionally fish on the Front Beach and they hit and miss. Some people seem to be taking more than their fair share. And I think we might want to look at additional reductions on the catch levels until Unalaska Lake and the Iliuliuk River start to recover as far as the salmon are concerned. We are seeing some concerns with the return of red salmon in Unalaska Lake (KARAC 2022:16).

A resident of Unalaska also gave testimony at the meeting:

My biggest concern here is enforcement of these lakes and streams, I mean, I'm totally frustrated with the issue of permits being issued and allowing people to have a permit doesn't give them any more authority to take whatever they want regardless of the amount and nobody's enforcing it. So really, I'm concerned about the lakes in Unalaska, Iliuliuk Lake (KARAC 2022:72).

Subsistence survey data provide information on salmon harvested for subsistence in Unalaska under any opportunity, including State, Federal, or retention from commercial catch. ADF&G Division of Subsistence conducted its first comprehensive subsistence study in Unalaska for the 1994 study year (Scarborough and Fall 1997). During the study year, permanent residents of Unalaska harvested an estimated 195 pounds of subsistence foods per person, of which approximately 28%, or 54 pounds per person, was salmon. Ninety-two percent of surveyed households used salmon. In terms of edible pounds harvested, Sockeye Salmon was the most important salmon species, followed by Coho Salmon and then Pink Salmon (Scarborough and Fall 1997). Most salmon were harvested with "subsistence methods" (primarily nets, 62% of the salmon harvest), followed by rod and reel (34% of the salmon

harvest), and removal from commercial harvests (4% of the salmon harvest) (Scarborough and Fall 1997).

A second comprehensive subsistence study was conducted in Unalaska for the 2020 study year (Keating et al. 2022). That year, 78% of households used salmon, more than any other resource, but fewer than the 92% of households reporting in 1994. During the study year, permanent residents of Unalaska harvested an estimated 80 pounds of subsistence foods per person, of which approximately 42%, or 33 pounds per person, was salmon. Division of Subsistence estimated that residents of Unalaska harvested a total of 69,727 salmon for subsistence in 2020 (Keating et al. 2022). Overall, the amount of wild foods harvested in 2020, including salmon, was down significantly from 1994, but salmon represented a larger percentage of the total wild food harvest, a change which may reflect declining crab stocks (Keating et al. 2022).

In terms of edible pounds harvested, Sockeye Salmon was again the most important salmon species in 2020, followed by Coho Salmon and then Pink Salmon (Keating et al. 2022). As in 1994, most salmon were harvested with “subsistence methods” (61%), followed by rod and reel (29%), and removal from commercial harvests (11%)². The percentage of salmon used for subsistence that came from the commercial catch increased in comparison to 1994, when it was 4% (Scarborough and Fall 1997, Keating et al. 2022).

Harvest History

A State subsistence fishery for fish returning to this system exists in the marine waters near the mouth of the drainage, at Front Beach and beyond the channel bridge connecting to Little South America. There is also a marine waters State sport fishery, primarily with snagging gear, that takes place in close vicinity to the mouth of the Iliuliuk drainage in Margaret’s Bay. The primary fish species targeted in this sport fishery is Sockeye Salmon. Although other Sockeye Salmon systems exist in Unalaska Bay, much of the harvest from this fishery was probably returning to the Iliuliuk drainage. Both fisheries are conducted in the two access directions salmon must pass to get into the Iliuliuk drainage. The marine waters harvest is primarily Sockeye Salmon, but some Coho Salmon are also caught. During even years, Pink Salmon dominate the escapement into this system and are easily harvested both in the sport and marine based subsistence fisheries. Subsistence harvest in this area has contributed only a small percentage of overall subsistence harvest in the Unalaska Island area in the past few years, as most harvest has taken place in Reese Bay near McLees Lake (Fox et al. 2018, 2019).

Sport fishing under State regulations is the only harvest for salmon currently allowed in the Unalaska Lake/Iliuliuk drainage. The entire drainage is closed year-round to fishing for Sockeye Salmon. Sport fishing for other salmon species is allowed only downstream of the ADF&G regulatory marker located at the Church Hole, which is located at the top end of the intertidal zone by the Russian Orthodox Church. This limited fishing area is approximately 200 yards long and the standard salmon sport regulations for the area apply for the other salmon species present, allowing 5 per day and 5 in possession, of which 2 may be Coho Salmon. Dolly Varden regulations allow 10 per day and 10 in

² Percentages may not total 100% due to rounding.

possession. The State's Sport Fish Division estimates sport fishing harvests through annual voluntary mail-in surveys. Estimated harvest from the Unalaska Lake system is grouped into a general Alaska Peninsula/Aleutian lakes category that covers a broad swath of the region (Alaska Sport Fishing Survey Database 2025).

Alternatives Considered

One alternative considered was to rescind the closure. This would open the entire Unalaska Lake drainage to harvest by federally qualified subsistence users. This alternative would provide for a rural preference under Title VIII of section 804 of the Alaska National Interest Lands Conservation Act (ANILCA) throughout the watershed. However, given the vulnerability of this system to overharvest, there are conservation concerns associated with this alternative.

Another alternative considered was to modify the closure to allow harvest by federally qualified subsistence users in Iliuliuk Creek downstream from ADF&G regulatory markers at Church hole under the Unalaska District Federal subsistence fishing regulations *and* establish new Federal subsistence regulations consistent with State sport regulations. This alternative aligns State sport and Federal subsistence regulations and alleviates conservation concerns. This change would allow for the harvest of salmon, excluding Sockeye Salmon, by federally qualified users in intertidal zone of Iliuliuk Creek, providing for a rural preference under Title VIII of section 804 of the Alaska National Interest Lands Conservation Act (ANILCA). Federally qualified fishers would be able to harvest fish under either the more liberal Federal regulations or the more conservative State Sport regulations. Under Federal regulations harvesters would not be required to purchase a \$20 State Sport fishing license.

This approach requires two actions: 1) modification of the existing closure, and 2) submitting a proposal for new Unalaska Lake drainage Subsistence fishing regulations. The latter is beyond the scope of a closure review. A proposal to change fisheries regulations is required to restrict gear, species, or harvest limits for federally qualified subsistence users.

Effects

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." There are currently nonsubsistence uses of salmon permitted in this area, while subsistence fishing for salmon is closed.

That being said, relatively weak salmon run sizes coupled with proximity to the Town of Unalaska make this fishery particularly vulnerable to overfishing. Under Unalaska District Federal subsistence regulations, up to 25 salmon plus an additional 25 salmon for each household member listed on a permit could harvest salmon through a variety of means, including seine and gillnet. Rescinding the closure and allowing federally qualified users to harvest under Federal Area regulations could lead to conservation concerns (KARAC 2022: 315-317). This scenario would also rely heavily upon the Federal in-season manager to issue temporary special actions year after year as conservation concerns persist. The in-season manager has delegated authority to open or close Federal subsistence fishing periods or areas provided under codified regulations and to specify methods and means; to specify permit requirements; and to set harvest and possession limits for Federal subsistence fisheries (**Appendix 2**).

OSM PRELIMINARY CONCLUSION

X Retain the Status Quo

- ☐ Rescind the Closure
- ☐ Modify the Closure
- ☐ Defer Decision on the Closure or Take No Action

The regulations should read:

§ ____ .27(e)(6) *Aleutian Islands Area*

(iv) *You may not subsistence fish for salmon in the following waters:*

(A) *The waters of Unalaska Lake its tributaries and outlet stream;*

Justification

The Iliuliuk River drainage is currently closed to the harvest of salmon by federally qualified subsistence users but remains open to State sport fishing with some restrictions on area, means and harvest limits. There are also State subsistence salmon opportunities in adjacent marine waters. Despite desire to provide rural preference for federally-qualified subsistence users, this small and easily accessible fishery is incapable of supporting harvest under Area Federal subsistence fishing regulations. In the absence of enacting new regulations with provisions that offer more conservation protections than the Unalaska District Federal subsistence fishing regulations, closure rescission is not advised at this time. The Council may choose to submit a proposal containing measures that allow for both species conservation and increased opportunity for Federally qualified subsistence users under ANILCA Title VIII.

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Unalaska Area State subsistence salmon fishing permit.

UNALASKA AREA SUBSISTENCE SALMON FISHING PERMIT

Permit expires October 31, 2020 (5AAC 01.380(c))





This permit is valid in the Unalaska District of the Aleutian Islands Area Only.

Name: _____
Address: _____

I have personally reviewed the information on this permit and I HEREBY CERTIFY THAT ALL OF THE INFORMATION IS TRUE AND CORRECT. (NOTE: Making a false statement, or omitting a material fact, is subject to a maximum penalty of \$10,000 or 1 year imprisonment, or both, per AS 11.56.210 and AS 16.05.665).

Permittee signatureDate

Additional members of same household to be included on permit (Alaska Residents Only):

Total number of salmon allowed on this permit: _____

Email Address or Phone: _____

SUBSISTENCE SALMON HARVEST REPORT

RECORD DATE, SPECIFIC LOCATION, AND NUMBER OF HARVESTED SALMON BY SPECIES
IMMEDIATELY UPON HARVEST

DATE	SPECIFIC LOCATION	KING	SOCKEYE	COHO	PINK	CHUM

REFER TO THE CURRENT SUBSISTENCE REGULATION BOOK FOR COMPLETE REGULATIONS

The catch report table must be filled out (even if the permit was not used) and returned by **October 31, 2020** to: Alaska Department of Fish and Game, Unalaska Salmon Management, 351 Research Court, Kodiak AK 99615. Failure to return this permit to ADF&G could result in denial of future permits.

Department representative _____ Date _____

(SEE OPPOSITE SIDE FOR SUBSISTENCE REGULATIONS)

SELECTED SUBSISTENCE REGULATIONS

These listed regulations are not inclusive of all the regulations that apply to subsistence salmon fishing in the Unalaska Area.

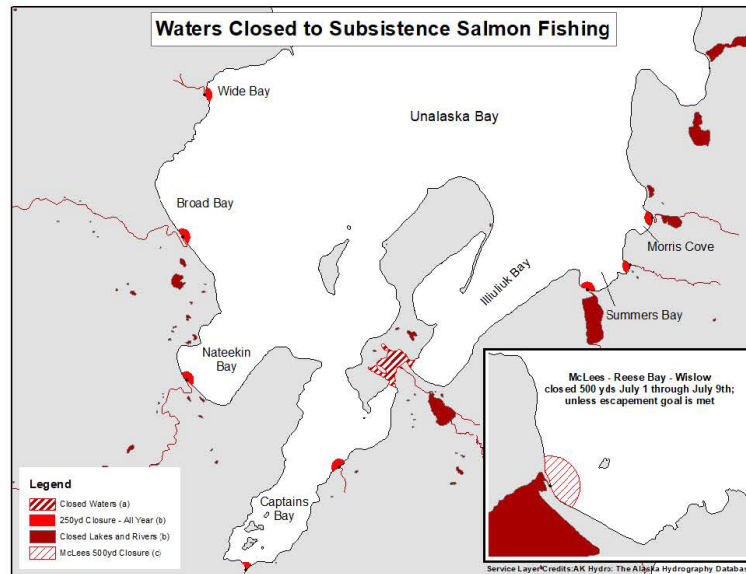
5 AAC 01.380. LIMITS TO NUMBER OF SALMON TAKEN: 25 salmon for the permit holder, of which no more than 10 sockeye salmon may be harvested from Front Beach in Unalaska Bay, plus an additional 25 salmon for each member of the same household whose name is listed on the permit, of which no more than 10 sockeye salmon may be harvested from Front Beach in Unalaska Bay. "Front Beach" means all Unalaska Bay waters south of a line from a point near the Bishop's House at 53° 52.64' N. lat., 166° 32.30' W. long., to a point on the Unalaska Bay shore at 53° 52.68' N. lat., 166° 30.91' W. long. Additional household permits are available by request from the local ADF&G representative.

5 AAC 01.375. CLOSED WATERS: (see map below)

- a. The waters of Unalaska Lake (at the city of Unalaska), its tributaries and the outlet stream, and all waters between Unalaska and Amaknak Islands, **including Margaret's Bay**, west of a line from the "Bishop's House" at 53° 52.64' N. lat., 166° 32.30' W. long. to a point on Amaknak Island at 53° 52.82' N. lat., 166° 32.13' W. long. and north of a line from a point south of Agnes Beach at 53° 52.28' N. lat., 166° 32.68' W. long. to a point at 53° 52.35' N. lat., 166° 32.95' W. long. on Amaknak Island.
- b. **Within Unalaska Bay** (south of a line from the northern tip of Cape Cheerful to the northern tip of Kalekta Point): **all waters are closed to subsistence salmon fishing within the waters of all streams, lakes, and within 250 yards of any anadromous stream outlet** (except for the vicinity of Unalaska Lake as described above in (a) above).
- c. **At Reese Bay (Wislow)**, no subsistence salmon fishing is allowed in the waters of McLees Lake and its drainages or tributaries. **No subsistence salmon fishing is allowed within 500 yards of the terminus of the McLees Lake outlet during July 1 through July 9.**

ADDITIONAL RESTRICTIONS:

1. **This permit must be carried by permit holder while harvesting and transporting subsistence caught salmon** and must be readily available for inspection.
2. **The number of subsistence salmon, the species, the location of the catch, and the date of catch must be recorded on this permit immediately after harvest.** Maintain a consistent tally of your catch on the permit. This includes fish that are given away or shared.
3. **Subsistence fisherman must be in attendance of their net at all times that it is fished.**
4. In the Unalaska District, subsistence net **may be fished ONLY from 6:00 AM through 9:00 PM daily.**
5. Only household members listed on the permit may assist in the harvest of subsistence salmon.
6. Salmon may be taken by seine or gillnet. Gillnets are restricted to 50 fathoms total length. Each gillnet must have a buoy on each end. The **name and address** of the operator must be plainly and legibly inscribed on each buoy.
7. From June 1 through September 15, a salmon seine vessel may not be used to take salmon for subsistence use 24 hours before or 12 hours after an open commercial fishing period within an area open to commercial salmon fishing.
8. **Salmon may not be taken by sport fishing methods while taking subsistence salmon with a net and you may not be in possession of sport caught and subsistence caught salmon at the same time.**
9. **No more than half the width of a stream or its mouth may be obstructed by a net.** This restriction includes blocking the stream mouth while "roundhauling."



For questions contact Fish and Game office: Dutch Harbor (907) 581-1239; Kodiak (907) 486-1882.

APPENDIX 2

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

Supervisory Fish Biologist
U.S. Fish and Wildlife Service
Anchorage Fish and Wildlife Conservation Office
4700 BLM Road
Anchorage, Alaska 99507

Dear Supervisory Fish Biologist:

This letter delegates specific regulatory authority from the Federal Subsistence Board (Board) to the Supervisory Fish Biologist - Anchorage Fish and Wildlife Conservation Office (Supervisory Fish Biologist) to issue emergency and temporary special actions (special actions) if 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 jurisdiction in the Bristol Bay/Alaska Peninsula/Aleutian Islands/Chignik Areas.

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 Council (Council), 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, Council Chair(s) and applicable Council members, local tribes, and Alaska Native Corporations to minimize disruption to subsistence resource users and existing agency programs, consistent with the need for special action.

DELEGATION OF AUTHORITY

1. Delegation: The Supervisory Fish Biologist 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 Bristol Bay/Alaska Peninsula/Aleutian Islands/Chignik Areas (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 the current State and Federal regulations, management plans, and stock status, and harvest 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 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

Enclosures: Maps of the Bristol Bay, Aleutian Islands, and Alaska Peninsula/Chignik areas

cc: Federal Subsistence Board
Office of Subsistence Management
Bristol Bay Subsistence Regional Advisory Council
Kodiak/Aleutians Subsistence Regional Advisory Council
Superintendent, Lake Clark/Katmai National Parks and Preserve
Manager, Togiak National Wildlife Refuge
Manager, Alaska Peninsula/Becharof National Wildlife Refuge Complex
Manager, Izembek 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