

FEDERAL FISHERIES CLOSURE REVIEW
FCR27-06

Issue

FCR27-06 is a routine review of a Federal closure to salmon fishing in all freshwater streams flowing into Unalaska Bay. 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 Bay freshwater streams—Salmon

Current Federal Regulation

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

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

(C) All streams supporting anadromous fish runs that flow into Unalaska Bay south of a line from the northern tip of Cape Cheerful to the northern tip of Kalekta Point;

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 not 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 purposes, 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, you 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 Regulation

Subsistence Regulations

Aleutian Islands Area

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;*
- (2) *within Unalaska Bay south of a line from the northern tip of Cape Cheerful to the northern tip of Kalekta Point: waters are closed to subsistence salmon fishing within 250 yards of any anadromous stream, except the outlet stream of Unalaska Lake, which is closed under (1) of this section;*

Relevant 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 01.380. 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 65.020. General provisions for seasons and bag, possession, annual, and size limits for the Alaska Peninsula and Aleutian Islands Area

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

(1) king salmon:

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

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

(ii) less than 20 inches in length; bag and possession limit of 10 fish; no annual limit;

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

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

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

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

The following waters are closed to sport fishing in the Alaska Peninsula and Aleutian Island Area:

(1) that portion of the Makushin River drainage upstream from an ADF&G regulatory marker located approximately two miles upstream from its mouth;

(2) that portion of the Nateekin River drainage upstream from an ADF&G regulatory marker located approximately two miles upstream from its mouth (immediately below the canyon hole);

(3) Humpy Cove and Summer Bay Lake outlet creeks;

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

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

(B) the Summer Bay Lake drainage and salt waters within a 250-yard radius of the Summer Bay Creek outlet are closed to sport fishing from August 16 through December 31;

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.

The closed area is comprised entirely of Federal public waters: all freshwaters within and adjacent to the exterior boundaries of Alaska Maritime Wildlife Refuge flowing into Unalaska Bay south of a line from the northern tip of Cape Cheerful to the northern tip of Kalekta Point (**Figure 1**).

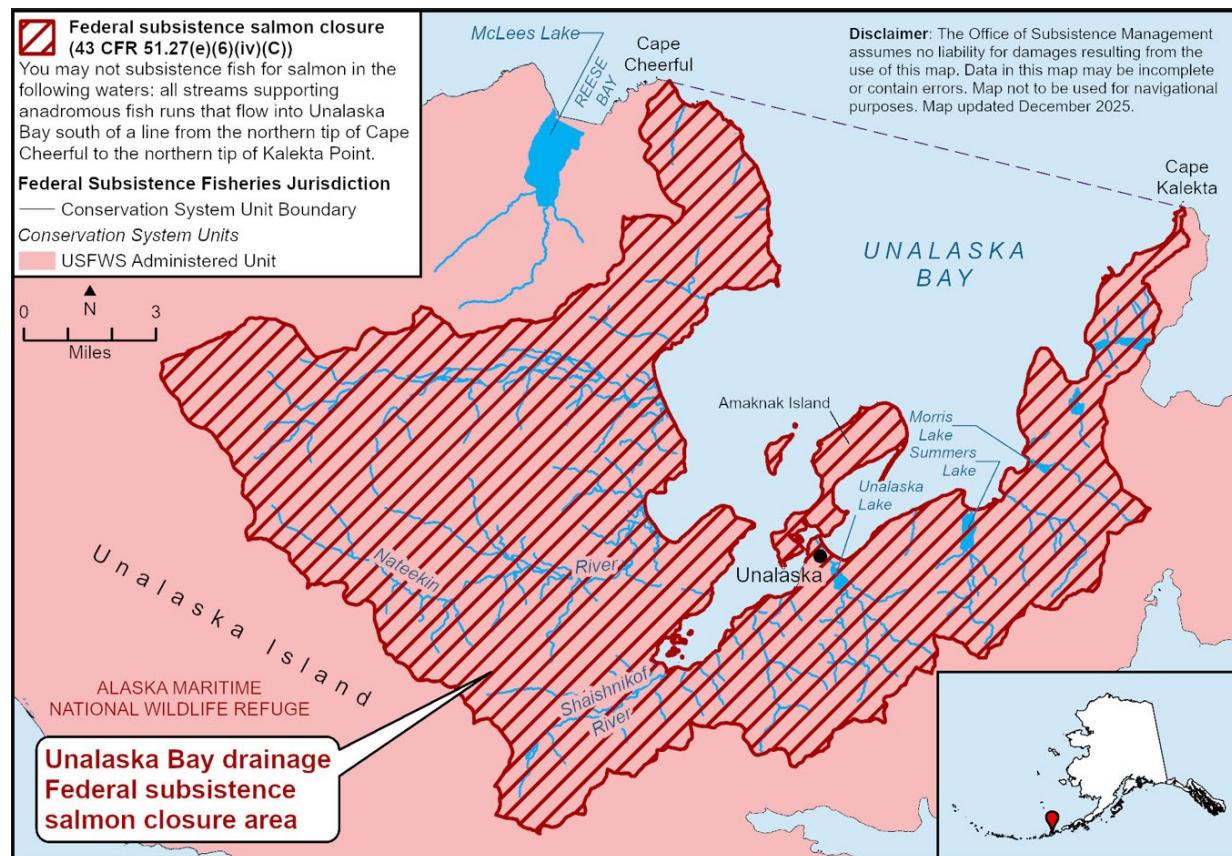


Figure 1. Map of freshwater drainages flowing into Unalaska Bay and external boundaries of the Alaska Maritime National Wildlife. Anadromous streams within these drainages are closed to Federal subsistence salmon fishing. This map should not be referenced for landownership.

Customary and Traditional Use Determination

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

Regulatory History

1999, the Federal Subsistence Board (Board) implemented revised Federal regulations for subsistence fishing in navigable waters, expanding beyond their preexisting jurisdiction in non-navigable waters (64 Fed. Reg. 5, 1307). Numerous revisions were made to Federal fishing regulations to ensure consistency with State subsistence fisheries regulations, (64 Fed. Reg. 5; 1284 [January 8, 1999]). Effective 1998-1999 State of Alaska subsistence and personal use regulations (ADFG 1998 included a closure of Summers, Morris and Unalaska lakes to State subsistence fishing (5 AAC 01.375). And in February of 2001, a closure prohibiting Federal subsistence salmon fishing in the freshwaters terminating in Unalaska Bay was added to Federal regulations (66 Fed. Reg. 30, 10154 [February 13, 2001]).

In 2020, the Kodiak Aleutian Subsistence Regional Advisory Council (Council) reviewed the closure and recommended that action be deferred until the 2023 meeting cycle to allow for additional time for community input (KARAC 2020). In alignment with the recommendation of the Council, the Board deferred FCR21-09 at their 2021 fisheries regulatory meeting.

In 2023, deferred Fisheries Proposal FCR21-09 was on the consensus agenda as FCR23-11; 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 over potential overharvest with closure re-cission, schedule misalignment of closure reviews and fisheries regulations cycles which 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 – FCR23-11

Justification for Original Closure

The original Unalaska Bay Federal subsistence fisheries closures 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]).

State Recommendation for Original Closure

None

Biological Background

There are many anadromous fish streams flowing into Unalaska Bay. Notable ones include Iliuliuk (Unalaska), Makushin, Nateekin, and Shaishnikof rivers, and Summers and Morris lake drainages

(Figure 1). Anadromous species present in these drainages, according to the ADF&G Anadromous Waters Catalog, are displayed in **Table 1** (Giefer and Evers 2025).

Table 1. Primary freshwater streams flowing into Unalaska Bay

Drainage	Species present
Makushin River (Broad Bay)	Chum, Coho, Pink, Dolly Varden
Nateekin River	Coho, Pink
Shaishnikof River (Captains Bay)	Chum, Coho, Pink
Iliuliuk (Unalaska) Drainage	Coho, Pink, Sockeye, Dolly Varden
Summers Lake	Coho, Pink, Sockeye
Morris Lake	Coho, Sockeye

Sockeye Salmon runs in Unalaska have declined since the mid- to late-1980s (Holmes 1997), and the permanent closure of subsistence fishing on Unalaska Lake in 1998 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 it 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). Unalaska Bay drainages are not monitored through annual ADF&G aerial indexing. Indexed escapement estimates generated from aerial drone surveys along the Unalaska road system are limited to the Iliuliuk (Unalaska), Summer, and Morris lakes (**Table 2**).

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 road system of Unalaska Island. The footage was provided to the Alaska Department of Fish and Game (ADF&G), who reviewed it and made estimates of the runs. They also provided feedback for improvement of the aerial video monitoring methods, with hopes of continuing these surveys.

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 in 2024 (Alaska Fish Count database, November 18, 2025). Cumulative counts for 2025 Sockeye escapement as of July 31, 2025 were 2,441, appreciably higher than previous drone indexed estimates (**Table 2**).

Table 2. Minimum Sockeye Salmon escapements at Unalaska Bay surveyed locations 2018-2023, based on aerial drone surveys. (Lawson 2020, Keyse et al. 2024). Iliuliuk weir count data are included for 2025 (Alaska Fish Count database, November 18, 2025).

Year	Iliuliuk (Unalaska) Lake	Summer Lake	Morris Lake
2018	583	3,622	315

2019	350	2,575	376
2020	815	4,507	106
2021	540	1,580	41
2022	115	760	27 ^b
2023	807	1,522	84
2025	2,441 ^a		

^a 2025 weir data are only available for Iliuliuk Lake.

^b Poor lake visibility during all surveys.

Cultural Knowledge and Traditional Practices

The Aleutian Islands and Pribilof Islands are located west of the Alaska Peninsula and are the homelands of the Unangâ, 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 Unangâ/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 Unangâ/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 Unangâ/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 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).

¹ Unangâ 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 Unangâ 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.

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 “Iluulax”, 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 listed the population of Unalaska in 2000 as 2,091 people, less than half that of the 2000 census (4,283) (Davis 2005). Davis specifically excluded any group quarter residents.

Residents of Unalaska have voiced concerns about overfishing and lack of enforcement in their area (KARAC 2022). At the September 2022 meeting of the Council, a resident of Unalaska provided testimony about the local impacts of overfishing:

We’re being forced to go further and further away from our homes because of overfishing... Even though they have a permit that doesn’t in my opinion give them the right to clean out the bays. Systematically over the past three to five years that has been happening and we saw a great loss of our primary fish, red, silvers. We had kings is there for the first time since the war and about five, six years ago they started showing up...[Kings] used to be in Summers Bay... It’s starting to build back up, but it’s being overfished (KARAC 2022:295-296).

In addition to overfishing, local concerns about pollution and its effects on subsistence species in Unalaska Bay have been documented by ethnographers beginning in the 1980s (Veltre and Veltre 1982, Reedy 2016, Keating et al. 2022). In her report on salmon subsistence in Aleutian island communities, Katherine Reedy noted that Sockeye Salmon are the most desirable salmon available in Unalaska Bay, but their abundance has declined, which locals attribute to “road construction, culverts, sediment runoff, and siltation ruining spawning beds” (Reedy 2016:25).

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 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

Subsistence harvest is reported on State issued subsistence fishing permits. Subsistence fishers around Unalaska primarily target Sockeye Salmon in Reese Bay that are returning to McLees Lake. However, in 2020 subsistence fishers reported harvesting an equal amount from the “Other Locations” category,

² Percentages may not total 100% due to rounding.

probably due to a low return to McLees Lake (**Tables 3 and 4**; Fox et. al 2022). Most of this harvest occurred at Volcano Bay which is not located within Unalaska Bay.

Table 3. Estimated Unalaska subsistence Sockeye Salmon harvest by major location, in number of fish, 2020 (adapted from Fox et al. 2022).

Location ^a	Sockeye Harvest ^b	Percent of total harvest
Reese Bay (Wislow)	613	45
Broad Bay	6	0
Wide Bay	0	0
Nateeken Bay	0	0
Captains Bay	0	0
Unalaska Lake vicinity	136	10
Other locations	610	45
Totals	1,365	100

^a Some permits fished in more than one location.

^b Reported harvest from returned subsistence permits. Harvest from unreturned permits was not estimated.

Table 4. Estimated Unalaska subsistence Coho Salmon harvest by major location, in number of fish, 2020 (adapted from Fox et al. 2022).

Location ^a	Coho Harvest ^b	Percent of total harvest
Reese Bay (Wislow)	4	1
Broad Bay	65	15
Wide Bay	1	0
Nateeken Bay	1	4
Captains Bay	170	40
Unalaska Lake vicinity	34	8
Other locations	130	31
Totals	420	100

^a Some permits fished in more than one location.

^b Reported harvest from returned subsistence permits. Harvest from unreturned permits was not estimated.

Alternative Considered

An alternative considered was to rescind the closure to allow harvest by federally qualified subsistence users throughout freshwater systems terminating in Unalaska Bay *and* establish new Federal subsistence regulations consistent with State sportfishing regulations. This would provide for a rural preference under Title VIII of section 804 of the Alaska National Interest Lands Conservation Act (ANILCA). It would allow Federally qualified subsistence users to harvest fish under a Federal permit and enable in-season managers to make conservation-based management decisions during the fishing season. Under this alternative, area, means and bag limit restrictions for federally qualified subsistence users would mirror State sport regulations. Harvest would be allowable with rod and reel only and bag

limits for salmon other than King Salmon would be five per day and five in possession, only two of which could be Coho and only 2 of which could be Sockeye Salmon. However, this alternative is beyond the scope of a closure review. No changes may be made to seasons, methods, means or limits. A Federal regulatory proposal would need to be submitted to affect the changes detailed in this alternative under Federal regulations.

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.” This area is currently closed to subsistence fishing but open to nonsubsistence uses. Rescinding the closure would provide Federal opportunity to harvest salmon throughout freshwater systems draining to Unalaska Bay and align open harvesting areas under both State and Federal regulations. Rescinding this closure would not affect the Federal subsistence salmon closures of the outlet streams of the Unalaska, Summers, and Morris Lake drainages.

Harvesters would not be required to purchase a \$20 State Sport fishing license under Federal regulations. Fishing for salmon would be allowed daily between 6 a.m. and 9 p.m. and would require a State subsistence permit (since there are no Federal subsistence fishing permits for this area).

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. Modifying the closure and allowing federally qualified users to harvest under Area Federal regulations could lead to overharvest and conservation concerns (KARAC 2022: 315-317). This scenario would rely heavily upon Federal in-season manager actions. The Federal in-season manager may issue temporary special actions to set provisions for the fishery such as stipulating gear types and setting limits in cases of conservation or continuation of subsistence concern. Salmon populations may be further protected by enacting more conservative regulations during the current fisheries regulatory cycle.

OSM PRELIMINARY CONCLUSION

- Retain the Status Quo
- X 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:*

(C) All streams supporting anadromous fish runs that flow into Unalaska Bay south of a line from the northern tip of Cape Cheerful to the northern tip of Kalekta Point;.

Justification

Freshwater systems draining into Unalaska Bay are currently closed to the harvest of salmon by federally qualified subsistence users but remain 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. Rescinding this closure would provide a mechanism to allow the in-season manager to exercise rural preference for subsistence harvest opportunities as conservation concerns arise. 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**). This approach relies heavily upon continued Federal in-season manager intervention and may be considered a short-term solution. A proposal outlining long-term conservation parameters for this fishery may be submitted during the current fisheries regulation cycle.

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SUBSISTENCE REGIONAL ADVISORY COUNCIL RECOMMENDATIONS

Kodiak Aleutians Subsistence Regional Advisory Council

INTERAGENCY STAFF COMMITTEE COMMENTS

ALASKA DEPARTMENT OF FISH AND GAME COMMENTS

WRITTEN PUBLIC COMMENTS

APPENDIX 1

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 subjection to a maximum penalty of \$10,000 or 1 year imprisonment, or both, per AS 11.56.210 and AS 16.05.665).							
Permittee signature			Date				
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.

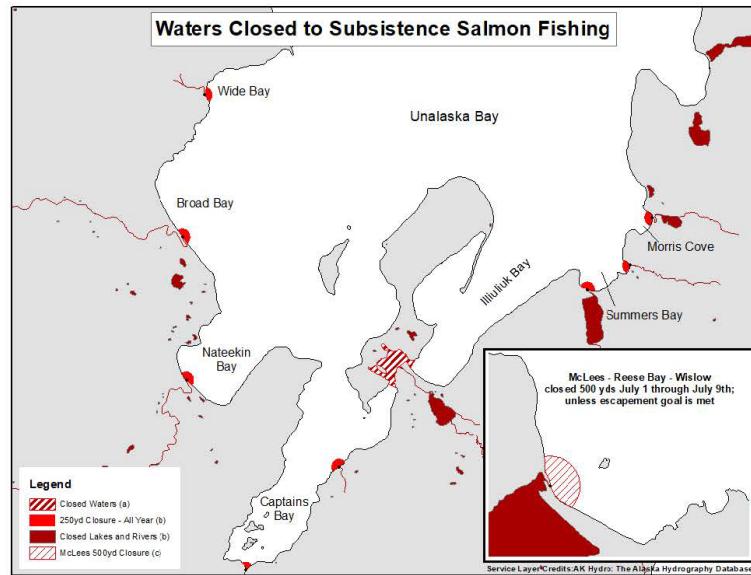
5 AAC 01.380. LIMITS TO NUMBER OF SALMON TAKEN: 25 salmon for the permit holder, of which no more than 10 sockeye salmon may be harvested from Front Beach in Unalaska Bay, plus an additional 25 salmon for each member of the same household whose name is listed on the permit, of which no more than 10 sockeye 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. 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 ADIF&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