

FCR27-04 Executive Summary	
General Description	Fisheries Closure Review FCR27-04 is a standard review of a Federal fishery closure to salmon harvest in the Unalaska Lake drainage by Federally Qualified Subsistence Users.
Current Regulation	§ __.27(e)(6) <i>Aleutian Islands Area</i> *** (iv) <i>You may not subsistence fish for salmon in the following waters:</i> (A) <i>The waters of Unalaska Lake, its tributaries and outlet stream;</i>
OSM Preliminary Conclusion	Rescind
Seward Peninsula Subsistence Regional Advisory Council Recommendation	
Interagency Staff Committee Comments	
ADF&G Comments	
Written Public Comments	None

FEDERAL FISHERIES CLOSURE REVIEW FCR27-04

ISSUE

Fisheries Closure Review 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 (36 CFR 242.27 and 43 CFR 51.27)

§ __.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.

(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 Iliuliuk 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**).

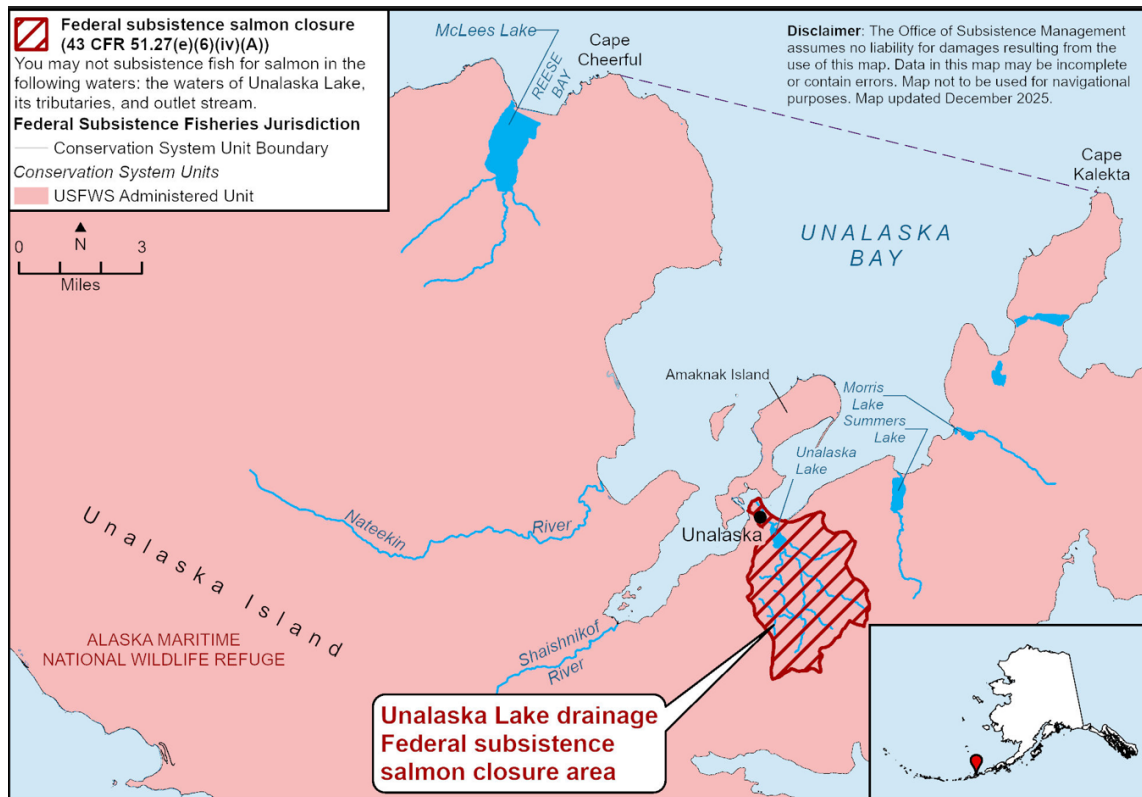


Figure 1. Map showing Unalaska (Iliuliuk) Lake drainage closure and external boundaries of the Alaska Maritime National Wildlife Refuge. This map should not be referenced for landownership.



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 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's recommendations, the Board deferred FCR21-08 at their 2021 fisheries regulatory meeting.

In 2023, deferred FCR21-08 was on the Board's regulatory 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

N/A

Biological Background

This system supports Coho (*Oncorhynchus kisutch*), Pink (*Oncorhynchus gorbuscha*), and Sockeye salmon (*Oncorhynchus nerka*) and Dolly Varden (*Salvelinus malma*) (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 Unalaska Lake escapement since 1979 through a variety of methods including visual encounter surveys, aerial drones, and most recently a weir at the mouth of Unalaska Lake (Keyse et al. 2024).

Drone surveys were conducted 2018–2023 to enumerate salmon in Unalaska road system drainages (Fox and Whiteside 2020, 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 road accessible salmon bearing streams. 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 Qawalangin 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 (Alaska Sport Fishing Survey database 1996-present, Keyse et al. 2024). Data collected for Coho Salmon is sufficient for indicating presence absence only, and cannot be used as an index of abundance or run strength.

Since 2018, minimum escapement estimates (**Table 1**) indicate small run sizes for each salmon species in Iliuliuk Creek (Unalaska Lake outlet stream). Tracking these trends over time, however, proves difficult given variable survey methodology (weir and aerial drone imagery) and lack of validation or standardization. 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 2018-2023, based on aerial drone surveys. Dashes indicate that no data are available. 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).

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 (Alaska Fish Count database, November 26, 2025).

Cultural Knowledge and Traditional Practices

The Aleutian and Pribilof islands are located west of the Alaska Peninsula and are the homelands of the Unanga, or Aleut, peoples.¹ As of 2025, there were an estimated 4,963 people living in eight communities within the western Aleutians (ADLWD 2025). It is common for residents of this region to recognize Unanga/Aleut, Russian, and European heritage (Reedy-Maschner 2010). Archaeological and ethnographic evidence indicates that people have been living and practicing subsistence in this region for at least 9,000 years (West et al. 2007, Corbett and Hanson 2023). Unalaska Bay is particularly rich in pre-contact archaeological sites, indicating 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 means “going half circle,” and refers to the curved approach traditionally taken by boats en route to the area (NPS 2015, Hudson 2025). This term was later adopted into Russian as “Iliuliuk” (Hudson 2025).

Harvesting wild resources has been, and continues to be, central to Unanga/Aleut identity, culture, and economy. Ethnohistorical data demonstrate that traditional ecological knowledge about natural resources, food webs, and climate has been passed down over generations (Sepez and Hunn 2010, Maschner et al. 2014). Key subsistence resources harvested in the area include salmon, Pacific Halibut, cod, sculpins, greenling, cetaceans, sea otter, seals, sea lions, shellfish, shorebirds, and waterfowl (Dumond and Bland 1995, Byers et al. 2011, Krylovich et al. 2019). Substantial amounts of salmon were traditionally harvested and preserved for winter use, typically by salting, drying, or smoking with cottonwood (Mishler 2001, Keating et al. 2022). These types of resources are customarily shared

¹ Unanga 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 Unanga 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.

widely and were also used as trade items among residents to gain social status and prestige (Reedy-Maschner 2010).

The more recent history of life on the Aleutian and Pribilof islands has been marked by tumultuous cultural and socio-economic change (Reedy-Maschner 2010). The mid-1700s was a period defined by conflict, disease, and traumatic social and economic change following Russian and European contact. Unalaska became the first permanent Russian settlement and an important port during this period (Veltre and Veltre 1982). Russians forced Unangax̂/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 (Reedy-Maschner 2010).

The western Aleutian Islands were occupied by the Japanese during World War II, at which point the U.S. government forced many Unangax̂ /Aleut residents 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 attract many non-local employees (Reedy-Maschner 2010, Schmidt and Berman 2018).

Today, the city of Unalaska is the largest in the Aleutian chain. The Port of Dutch Harbor is situated on adjacent Amaknak Island, and it 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 2025, Unalaska City (including Dutch Harbor) had an estimated population of 4,099, greater than the population of all other communities in the region combined (ADLWD 2025). However, seasonal fishing industry workers living in workers’ quarters were estimated to account for about 62% of this total (ADLWD 2025). Recent research conducted by ADF&G estimated the population of permanent Unalaska residents to be approximately 1,560 (Keating et al. 2026).

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).

Harvest History

The Unalaska District is one of five subsistence fishery management districts in the Aleutian Islands Area. A State subsistence fishing permit is required to harvest salmon under State or Federal

regulations in the Unalaska District. 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 personal use as “home pack” in the Unalaska District, but this harvest is not captured in returned permits. However, a relatively small percentage of “home pack” salmon are derived from commercial harvest because the commercial fishery in this area primarily targets shellfish and groundfish (Keating et al. 2022, Brown et al. 2023).

A State subsistence fishery for fish returning to the Unalaska Lake 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 that takes place in close vicinity to the mouth of the Iliuliuk drainage in Margaret’s Bay. Users primarily harvest Sockeye Salmon with snagging gear in this sport fishery. Although other Sockeye Salmon systems exist in Unalaska Bay, much of the salmon harvest in this area is likely attributable to salmon returning to the Iliuliuk drainage. 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 a small percentage of overall subsistence harvest in the Unalaska Island area in the past few years (Keyse et al. 2026).

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 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).

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 survey in Unalaska for the 1994 study year (Scarborough and Fall 1997). During that study year, permanent residents of Unalaska harvested an estimated 195 pounds of wild foods per person, of which approximately 28% was salmon (**Table 2**). Ninety-two percent of surveyed households used salmon (**Table 2**). In terms of edible pounds harvested, Sockeye Salmon was the most important salmon species, followed by Coho Salmon and Pink Salmon (Scarborough and Fall 1997). Sockeye, Coho, and Pink salmon are generally more accessible to Unalaska residents because they return to road-accessible systems such as Unalaska Lake, Summer Bay, Morris Cove, and Humpy Cove (Keating et al. 2022: 55). About 62% of all salmon were harvested with subsistence net gear, followed by rod and reel (34%), and removal from commercial harvest (4%) (**Table 3**).

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. In 2020, permanent residents of Unalaska harvested an estimated 79 pounds of wild foods per person, of which approximately 42% was salmon (**Table 2**). In terms of weight, Sockeye Salmon was again the most important salmon species harvested in 2020, followed by Coho Salmon and Pink Salmon (Keating et al. 2022). As in 1994, most salmon were harvested with subsistence net gear (61%), followed by rod and reel (29%), and removal from commercial harvest (11%) (**Table 3**).

Overall, the amount of salmon and other wild foods harvested in 2020 was significantly lower than that harvested in 1994. However, salmon represented a larger percentage of the total wild food harvest in 2020, a change which may be related to declining crab stocks in the area (Keating et al. 2022). Salmon harvest success was generally high, with 44% of Unalaska households attempting harvest and 41% successfully harvesting at this time (Keating et al. 2022). Still, sharing patterns reflect the importance of high harvesting households, as nearly half (48%) of all Unalaska households received salmon while only 12% gave salmon away during this study period (**Table 2**). Approximately 16% of the households in Unalaska were responsible for 70% of the total subsistence harvest (Keating et al. 2022).

An additional survey designed to specifically understand household salmon harvests was conducted in Unalaska for the 2022 study year (Keating et al. 2026). At this time, approximately 74% of Unalaska households reported using salmon, with an average harvest of 12 pounds per person (**Table 2**). Both numbers were substantial, but lower than those reported in 1994 and 2020. Similarly, a lower percentage of households reported attempting to harvest (33%) and successfully harvesting salmon (29%) in 2022 (**Table 2**). However, a higher proportion of households reported giving and receiving salmon in 2022 than in 2020 (**Table 2**). In terms of weight, Sockeye Salmon was again the most important salmon species harvested in 2022, followed by Coho Salmon and Pink Salmon (Keating et al. 2026). Like the previous surveys, most salmon were harvested with subsistence net gear (55%) (Keating et al. 2026). However, the percentage of salmon harvested via rod and reel (44%) was substantially higher in 2022, while the proportion of salmon taken via home pack was minimal (< 2%) (**Table 3**). Keating and colleagues (2026: 7) suggest that road-accessible systems have been heavily used for salmon fishing with rod and reel gear in recent years due to the growing population of Unalaska.

Declining subsistence harvests in Unalaska are associated with complex socio-economic and environmental changes (Scarborough and Fall 1997; Keating et al. 2022, 2026). The population of Unalaska has increased significantly since the 1970s, wage labor has become more important over the past several decades, and access to subsistence resources has diminished in recent years due to competition, the rising costs of fuel, and declines in resource abundance (Keating et al. 2022, 2026). Sockeye Salmon runs in Unalaska have generally declined since the mid-to-late 1980s (Holmes 1997). Unalaska residents have noted concerns about these declines Sockeye Salmon and other subsistence resources for years; such concerns resulted in the Board of Fisheries (BOF) closing Unalaska Bay to trawling at its 2016 meeting (Keating et al. 2026: 1). Broader environmental changes including warmer

summers, changing rainfall patterns, and increased environmental degradation from industrial pollution are also impacting local subsistence practices (Keating et al. 2022).

One Unalaska resident explained how work obligations have required some people to focus their efforts on places where they can harvest most efficiently, like McLees Lake:

I mean a lot of the fish camps aren't really being used much anymore. And I guess probably what's changed is that a lot of families, every family probably works, you know. So, people are busy and working, and so I think what people do is they just go to Wislow [McLees Lake] a couple times and get their fish for the year (Keating et al. 2022: 100).

McLees Lake was the primary off-road system that Unalaska residents referenced as being important for subsistence salmon fishing in 2020 (Keating et al. 2022). Even so, residents noted that fishing at McLees Lake can be challenging because it is located a significant distance from town, and getting to the system requires traveling in open waters that can be dangerous outside of ideal conditions (Keating et al. 2022). However, researchers suggested that because Unalaska residents had expressed support for maintaining fishing closures on the road system to protect vulnerable salmon runs in recent years, many households may have become more reliant on people with access to the McLees Lake system or Volcano Bay (Keating et al. 2022: 125).

Still, other residents emphasized that changes in subsistence practices in Unalaska are primarily related to the rising cost of fuel. Fuel costs may be increasing some Unalaska residents' reliance on road-accessible fishing areas closer to home such as Summer Bay at Morris Cove, Humpy Cove, Summer Bay Lake, the Mouth of the Shaishnikoff River, and Front Beach (Keating et al. 2022, 2026). However, one resident stated that road-accessible fishing locations such as Front Beach and Summer Bay are "silted in, and the run is really low, and the effort is too high. The effort is going to kill these two [runs] if something isn't done soon." (Keating et al. 2022: 93). Others shared that the Coho Salmon run at Morris Cove had been "badly damaged", and that the Sockeye Salmon population at Summer Bay was depleted (Keating et al. 2022: 79). Overfishing and insufficient enforcement of harvest limits are recognized issues, with many residents observing that people seem to ignore harvest limits in road-accessible areas (KARAC 2022, Keating et al. 2022, 2026), perhaps due to the need to make efficient use of time and fuel. At the September 2022 meeting of the Council, an Unalaska resident explained how overfishing in the most road-accessible areas now required people to travel further to access salmon:

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 – reds and silvers. We had kings in there for the first time since the war, about five or 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 since the 1980s (Veltre and Veltre 1982, Reedy

2016, Keating et al. 2022). In her report on subsistence salmon fishing in Aleutian Island communities, Reedy (2016: 25) noted that Sockeye Salmon are the most desirable salmon available in Unalaska Bay, but their abundance had declined, which locals attributed to the impacts of “road construction, culverts, sediment runoff, and siltation ruining spawning beds.”

Table 2. Estimated harvest and use of salmon in Unalaska in 1994, 2020, and 2022 (Scarborough and Fall 1997; Keating et al. 2022, 2026). *(HH stands for households).

Year	HHs Using	HHs Harvesting	HHs Giving	HHs Receiving	Average Total Salmon Harvest per person (lbs.)	Average Total Subsistence Harvest per person (lbs.)
1994	92%	67%	53%	71%	54	195
2020	78%	41%	12%	48%	33	79
2022	74%	29%	33%	61%	12	-
Average	81%	46%	33%	60%	33	137

Table 3. Estimated total number of salmon harvested by species and gear type in Unalaska in 1994, 2020, and 2022 (Scarborough and Fall 1997; Keating et al. 2022, 2026).

Year	Species	Removed from Commercial Catch	Subsistence Gear other than Rod and Reel	Rod and Reel	Any Method
1994	Chum	231	584	46	861
	Coho	126	2,369	2,662	5,156
	Chinook	39	102	23	163
	Pink	226	4,391	3,918	8,535
	Sockeye	518	9,278	1,657	11,453
	Total	1,140	16,724	8,306	26,170
2020	Chum	61	35	87	183
	Coho	350	2,784	1,582	4,716
	Chinook	70	52	131	254
	Pink	9	867	2,189	3,064
	Sockeye	1,401	6,925	1,050	9,376
	Total	1,891	1,0663	5,040	17,594
2022	Chum	0	9	51	60
	Coho	0	286	711	997
	Chinook	60	113	45	218
	Pink	0	143	572	715
	Sockeye	0	2,052	753	2,808*
	Total	60	2,603	2,132	4,795

* This number includes three salmon of unspecified species.

Despite these issues, subsistence resources continue to be critical in Unalaska, with salmon being particularly important. In recent years, subsistence fishers around Unalaska have harvested the majority of their Sockeye Salmon in off-road locations such as Reese Bay near McLees Lake (Fox et al. 2022, Keyse et al. 2026). In 2024, subsistence fishers also reported harvesting a substantial number of salmon from Volcano Bay (Tables 4 and 5; Fox et. al 2022). Volcano Bay is located about sixty miles southwest of Unalaska and requires a suitable boat and decent weather conditions to access (Fox et al. 2022). Harvest along the Unalaska road system primarily comes from Front and Agnes Beach near Unalaska Lake, whereas other systems of Unalaska Bay have seen a decrease in fishing pressure in recent years (Keyse et al. 2026: 17). Overall, the most recent ten-year average subsistence Sockeye Salmon harvest is about 38% lower than the previous ten-year average for the Unalaska District (Table 4). Average permits reported fished per year also decreased between these two periods, but only by about 6% (Keyse et al. 2026). Only Volcano Bay has shown a generally increasing harvest trend between these two periods (Keyse et al. 2026).

Table 4. Estimated Unalaska subsistence Sockeye Salmon harvested in 2024, and recent ten-year harvest averages by major location and number of fish (adapted from Keyse et al. 2026).

Location ^a	Sockeye Harvest ^b in 2024 (#)	Percent of Total Harvest in 2024 (%)	Average Harvest 2004 - 2013	Average Harvest 2014 - 2023
Reese Bay (Wislow)	580	49	2,815	1,480
Broad Bay	0	0	-	-
Wide Bay	0	0	-	-
Nateeken Bay	1	1	-	-
Captains Bay	0	0	-	-
Unalaska Lake vicinity	152	13	286	223
Volcano Bay	439	37	77	349
Other locations	0	0	-	-
Totals	1,172	100	3,421	2,123

^a Some permits fished in more than one location.

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

Table 5. Estimated Unalaska subsistence Coho Salmon harvested in 2024 by major location and number of fish (adapted from Keyse et al. 2026).

Location ^a	Coho Harvest ^b	Percent of Total Harvest
Reese Bay (Wislow)	2	1
Broad Bay	11	8
Wide Bay	0	0
Nateeken Bay	38	28
Captains Bay	1	1
Unalaska Lake vicinity	46	34
Other locations	36	27
Totals	134	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

Rescinding the closure was also considered. This alternative would provide for a rural priority under Title VIII of section 804 of the Alaska National Interest Lands Conservation Act (ANILCA) and open the entire watershed up to harvest by federally qualified subsistence users. If this happened, harvest would take place under area-wide regulations, which could pose conservation concerns. However, rescinding the closure in concert with supporting FP27-02 would impose conservative harvest regulations by limiting methods and means and daily and possession limits in line with State sport fish regulations throughout Unalaska Bay, including Unalaska Lake. Federally qualified subsistence users would be able to harvest fish under either Federal or State sport fish regulations. Under Federal regulations harvesters would not be required to purchase a \$20 State sport fishing license.

Discussion and 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. OSM considers this situation counter to ANILCA, and suggests the closure to subsistence uses of salmon in these systems needs to be lifted. Retaining the Status Quo would not accomplish this. Harvest data indicate that Unalaska Lake subsistence use is low. Additionally, the pre-existing sport fishery suggests that, rather than adding more user pressure to the system, a redistribution of existing fishers across the two management systems is likely to occur (Keating et al. 2022:90-91). Adopting regulations similar to State sport fish, which call for limited seasons, open areas, and allowable gear types, combined with species restriction and conservative daily and possession limits, would further allay conservation concerns associated with opening this fishery up to area-wide Federal subsistence regulations. The Federal in-season manager also has Board 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

- ☐ Retain 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. However, rescinding the closure provides Federal subsistence priority and does not likely jeopardize population viability when considered in concert with FP27-02 which proposes to adopt

conservation-minded regulations throughout Unalaska Bay, including Unalaska Lake, in line with State sport fish regulations. During times of conservation concern, concern for public safety, or for the continuation of subsistence practices, the Federal in-season manager may also choose to restrict or close the fishery.

LITERATURE CITED

ADCCED (Alaska Department of Commerce, Community, and Economic Development) 2024. DCRA Open Data, online database. <https://dcra-cdo-dcced.opendata.arcgis.com/>, retrieved June 4, 2024. Division of Community and Regional Affairs.

ADFG (Alaska Department of Fish and Game). 1968. Regulations of the Alaska Board of Fish and Game for Commercial Fishing in Alaska. Alaska Department of Fish and Game, Division of Commercial Fisheries, Juneau, AK.

ADLWD (Alaska Department of Labor and Workforce Development). 2024. Alaska Department of Labor and Workforce Development: Alaska population estimates. <https://live.laborstats.alaska.gov/data-pages/alaska-population-estimates>. Retrieved: May 28, 2024.

Alaska Fish Count database. 1978-Present. Anchorage, AK. Alaska Department of Fish and Game, Division of Sport Fish. <https://www.adfg.alaska.gov/sf/FishCounts/>. Retrieved: November 18, 2025.

Alaska Sport Fishing Survey Database. 2025. Anchorage, AK: Alaska Department of Fish and Game, Division of Sport Fish. <http://www.adfg.alaska.gov/sf/sportfishingsurvey/>. Retrieved: December 11, 2025.

Brown, C.L., H. Cold, L. Hutchinson-Scarborough, B. Jones, J.M. Keating, B.M. McDavid, M. Urquia, J. Park, L.A. Sill, and T. Barnett. 2022. Alaska subsistence and personal use salmon fisheries 2019 annual report. ADF&G Div, of Subsistence Tech. Paper No. 490. Anchorage, AK

Brown, C. L., T. Bembenic, M. Brown, H. Cold, J. Coleman, E. Donaldson, J. Egelhoff, B. Jones, J.M. Keating, L. A. Sill, M. Urquia, C. Wilcox, and T. Barnett. 2023. Alaska subsistence and personal use salmon fisheries 2020 annual report. ADF&G, Div. of Subsistence. Tech. Paper No. 494. Anchorage, Fairbanks, and Douglas, AK.

Byers, D.A. et al. 2011. Stable isotope chemistry, population histories and Late Prehistoric subsistence change in the Aleutian Islands. *Journal of Archaeological Science*. 38: 183-196.

Corbett, D.G., and D. Hanson. 2023. Culture and archaeology of the ancestral Unanga/Aleut of the Aleutian Islands, Alaska. Springer. Charn, Switzerland.

Davis, Brian 2005. Subsistence fisheries harvest assessment and traditional ecological knowledge, Lower Alaska Peninsula and Aleutian Islands. ADF&G, Div. of Subsistence. Tech. Paper No. 301. Juneau, AK.

Dumond, D.E. and R.L. Bland. 1995. Holocene prehistory of the northernmost North Pacific. *Journal of world prehistory*. 9(4): 401-451.

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

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

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

Fox, E. K. C., C. G. Lipka, and L. K. Stumpf. 2018. South Alaska Peninsula salmon annual management report, 2017 and the 2016 subsistence fisheries in the Alaska Peninsula, Aleutian Islands, and Atka-Amlia Islands management areas. Alaska Department of Fish and Game, Regional Information Report No. 4K18-05, Kodiak., AK.

Fox, E. K. C., L. K. Stumpf, and C. J. Whiteside. 2019. South Alaska Peninsula salmon annual management report, 2018 and the 2017 subsistence fisheries in the Alaska Peninsula, Aleutian Islands, and Atka-Amlia Islands management areas. Alaska Department of Fish and Game, Regional Information Report No. 4K19-01, Kodiak, AK.

Holmes, P.B. 1997. Aleutian Islands and Atka-Amlia Islands management areas salmon management report to the Alaska Board of Fisheries, 1998. ADF&G, Division of Commercial Fisheries Management and Deveelopment, Regional Information Report No. 4K97-57. Kodiak, AK.

Holmes, P.B. 1998. Aleutian Islands and Atka-Amlia Islands Management Areas Salmon Management Report, 1997. Alaska Department of Fish and Game Commercial Fisheries Management and Development Division, Regional Information Report No. 4K98-3, Kodiak, AK

Hudson, R. 2025. The story of a name—Unalaska or Dutch Harbor? The City of Unalaska, Alaska. <https://www.unalaska.gov/community/page/story-name-unalaska-or-dutch-harbor>. Retrieved December 5, 2025.

Giefer, J., and B. Evers. 2025. Catalog of waters important for spawning, rearing, or migration of anadromous fishes - Southwest Region, June 2025. Alaska Department of Fish and Game, Special Publication No. 25-05, Anchorage.

KARAC. 2020. Transcripts of the Kodiak Aleutians Subsistence Regional Advisory Council proceedings. September 2-3, 2020. Teleconference. Office of Subsistence Management, USFWS. Anchorage, AK.

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

Keating, J. M., L.A. Sill, and D. Koster. 2022. The harvest and use of wild resources, Unalaska, Alaska, 2020. ADF&G Div. of Subsistence Tech. Paper No. 491. Anchorage and Douglas, AK.

Keating, J. M., A. L. Brewster, and D. Koster. 2026. Estimation of McLees Lake Sockeye Salmon Escapement and Subsistence Salmon Harvest for Unalaska, 2022-2023. ADF&G Division of Subsistence Tech. Paper No. 525. Anchorage, AK. 149 pp.

Keyse, M. D., G. Spalinger, and A. L. Brewster. 2024. South Alaska Peninsula Salmon Annual Management Report and 2023 Subsistence Fisheries in the Alaska Peninsula, Aleutian Islands, and Atka-Amlia Islands Management Areas. Alaska Department of Fish and Game Divisions of Sport Fish and Commercial Fisheries, Regional Information Report No. 25-27, Kodiak, AK.

Krylovich, O.A., D.D. Vasyukov, B.F. Khasanov, V. Hatfield, D. West, A.A. Savinetsky. 2019. Hunter-gatherers subsistence and impact on fauna in the Islands of the Four Mountains, Eastern Aleutians, Alaska over 3000 yr. *Quaternary Research*. 91(3): 983-1002.

Lawson, T. 2020. 2019 Escapement Estimates Using Drone Surveys on Unalaska Road-System Salmon Streams and Lakes Unpublished memorandum. Alaska Department of Fish and Game, Division of Commercial Fisheries. Kodiak, AK. 3 pp.

Maschner, H.D.G., A.W. Trites, K.L. Reedy-Maschner, and M. Betts. 2014. The decline of Steller sea lions (*Eumetopias jubatus*) in the North Pacific: insights from indigenous people, ethnohistoric records and archaeological data. *Fish and Fisheries*. 15: 634-660.

NPS. 2015. Aleutian voices: forced to leave. <https://www.nps.gov/articles/aleutian-voices-forced-to-leave.htm#:~:text=The%20first%20people%20of%20the%20Aleutians%2C%20the,To%20the%20Unangax%2C%20the%20natural%20world%20was>. Retrieved: December 5, 2025.

Qawalangin Tribe of Unalaska. 2025. Unangan Culture. <https://www.qawalangin.com/unangax>. Retrieved: December 11, 2025.

Reedy-Maschner, K.L. 2010. Aleut identities: tradition and modernity in an indigenous fishery. McGill-Queen's University Press. Ithaca, New York. 314 pp.

Reedy-Maschner, K.L. and H. Maschner. 2012. Subsistence study for the North Aleutian Basin. U.S. Department of Interior, Bureau of Ocean Energy Management, Alaska Region. Anchorage, AK. OCS Study BOEM 2012-109. 428 pp.

Scarborough, L., and J.A. Fall. 1997. Unalaska: subsistence harvest and use information. Alaska Department of Fish and Game Division of Subsistence, Special Publication No. SP1997-001, Anchorage, AK.

Schmidt, J. and M. Berman. 2018. Adapting to environmental and social change: subsistence in three Aleutian communities. Institute of Social and Economic Research. Anchorage, Alaska. <https://scholarworks.alaska.edu/handle/11122/8981> 18 pp. Retrieved: June 19, 2022.

Sepez, J. and E. Hunn. 2010. Akutan field report for the local and traditional knowledge component of the Bering Sea Integrated Ecosystem Research Program (BSIERP-LTK). Berin Sea Integrated Ecocystem Research program. <https://data.ucar.edu/dataset/akutan-field-report-for-the-local-and-traditional-knowledge-component-of-the-bering-sea-integra> 15 pp. Retrieved June 19, 2022.

U.S. Census. 2020. Unalaska city, Alaska. https://www.census.gov/search-results.html?q=Unalaska+Dutch+harbor&page=1&stateGeo=none&searchtype=web&cssp=SERP&_charset_=UTF-8. Retrieved July 17, 2022.

Veltre, D.W. and M. J. Veltre. 1982. Resource utilization in Unalaska, Aleutian Islands, Alaska. ADF&G, Div. of Subsistence. Tech. Paper No. 58. Anchorage, AK.

West D, Crawford M, Savinetsky AB. 2007. Genetics, prehistory and the colonisation of the Aleutian Islands. *Earth and Environmental Science Transactions of the Royal Society of Edinburgh*. 98(1):47-57. doi:10.1017/S1755691007000023

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 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.

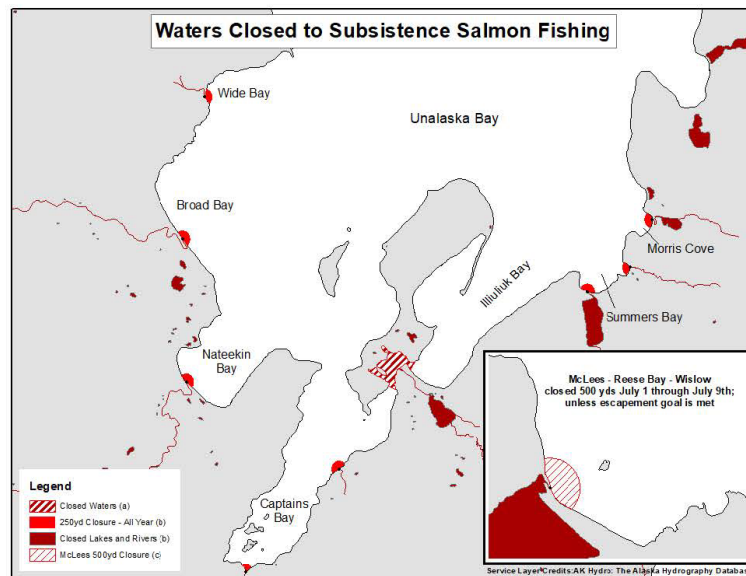
5 AAC 01.380. LIMITS TO NUMBER OF SALMON TAKEN: 25 salmon for the permit holder, of which no more than 10 sockeye salmon may be harvested from Front Beach in Unalaska Bay, plus an additional 25 salmon for each member of the same household whose name is listed on the permit, of which no more than 10 sockeye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