

FP27-02 Executive Summary

General Description	Fisheries Proposal FP27-02 requests that the Federal Subsistence Board establish rod and reel subsistence salmon fishing limits throughout Unalaska Bay freshwaters consistent with State sport fishing regulations. <i>Submitted by: Kodiak/Aleutians Subsistence Regional Advisory Council</i>
Proposed Regulation	§___.27(e)(6) Aleutian Islands Area *** <i>(iv) You may not subsistence fish for salmon in the following waters:</i> *** <i>(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; that portion of the Makushin River drainage upstream from an ADF&G regulatory marker located approximately two miles upstream from its mouth;</i> <i>(D) 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);</i> *** <i>(ix) You may subsistence fish for salmon with rod and reel only in the following locations:</i> *** <i>(B) Streams draining to Unalaska Bay south of a line from the northern tip of Cape Cheerful to the northern tip of Kalekta Point;</i> ***

	<i>(2) Bag and possession limits of five fish, of which no more than two fish may be coho salmon and two fish may be sockeye salmon;</i>
OSM Preliminary Conclusion	Support FP27-02
Kodiak/Aleutians Subsistence Regional Advisory Council Recommendation	
Interagency Staff Committee Comments	
ADF&G Comments	
Written Public Comments	None

DRAFT FISHERIES ANALYSIS

FP27-02

ISSUE

Fisheries Proposal FP27-02, submitted by the Kodiak/Aleutians Subsistence Regional Advisory Council (Council), requests to set harvest regulations for subsistence salmon fishing throughout salmon-bearing streams draining into Unalaska Bay. The proposed regulations would allow harvest by rod and reel only and implement bag and possession limits that align with current State sport fishing regulations, including retaining closures within the Makushin and Nateekin River drainages. This proposed action corresponds to the same area and fishery that is also under review this regulatory cycle as part of the Board's regular review of fishery closures (FCR27-06). The information presented in this analysis in the regulatory history, biology, cultural practices and traditional knowledge, and harvest history sections will be the same as that presented in FCR27-06.

PROPONENT STATEMENT

The proponent explains that the Unalaska Bay drainages have been closed to subsistence fishing since 2001. However, during this time, the area has remained open to sport fishing. This situation runs counter to the subsistence priority required in Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA) (57 FR 2290). The proponent recognizes that re-opening this fishery under general area-wide harvest regulations could pose a conservation threat to local salmon stocks. Therefore, the proponent would like to limit allowable gear types to rod and reel and enact harvest limits, seasons, and closures mirroring current State of Alaska sportfish regulations.

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 Regulation (36 CFR 242.27 and 43 CFR 51.27)

§ __.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.

(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, 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).

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

(D) 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);

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

(B) Streams draining to Unalaska Bay south of a line from the northern tip of Cape Cheerful to the northern tip of Kalekta Point;

(2) Bag and possession limits of five fish, of which no more than two fish may be coho salmon and two fish may be sockeye salmon;

Note: This area also includes specific closures to subsistence salmon fishing in Summers, Morris and Unalaska lakes. There are corresponding closure reviews specific to these three systems (Summers, Morris lakes FCR27-05; Unalaska Lake FCR27-04) as well as a proposal seeking changes to the closure to subsistence salmon fishing in Summers Lake (FP27-03) for this

regulatory cycle. Those closures and proposed regulation changes will be clarified within those analyses.

Current State Regulation

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.

5 AAC 01.375 Waters closed to subsistence fishing

The following waters are closed to subsistence fishing for salmon:

(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;

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° 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;

(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.

(a) Unless otherwise provided by emergency order, issued under [AS 16.05.060](#), the special provisions regarding bag, possession, and annual limits, and methods and means in this section apply to sport fishing 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;

Extent of Federal Public Lands/Waters

For purposes of this discussion, the phrase “Federal public waters” is defined as those waters described under 36 CFR 242.3 and 43 CFR 51.3. The area under consideration is comprised entirely of Federal public waters: all freshwaters within and adjacent to the exterior boundaries of Alaska Maritime National 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**). The proposal area matches this closure area, with specific closure retention areas proposed for retention within the Makushin and Nateekin River drainages.

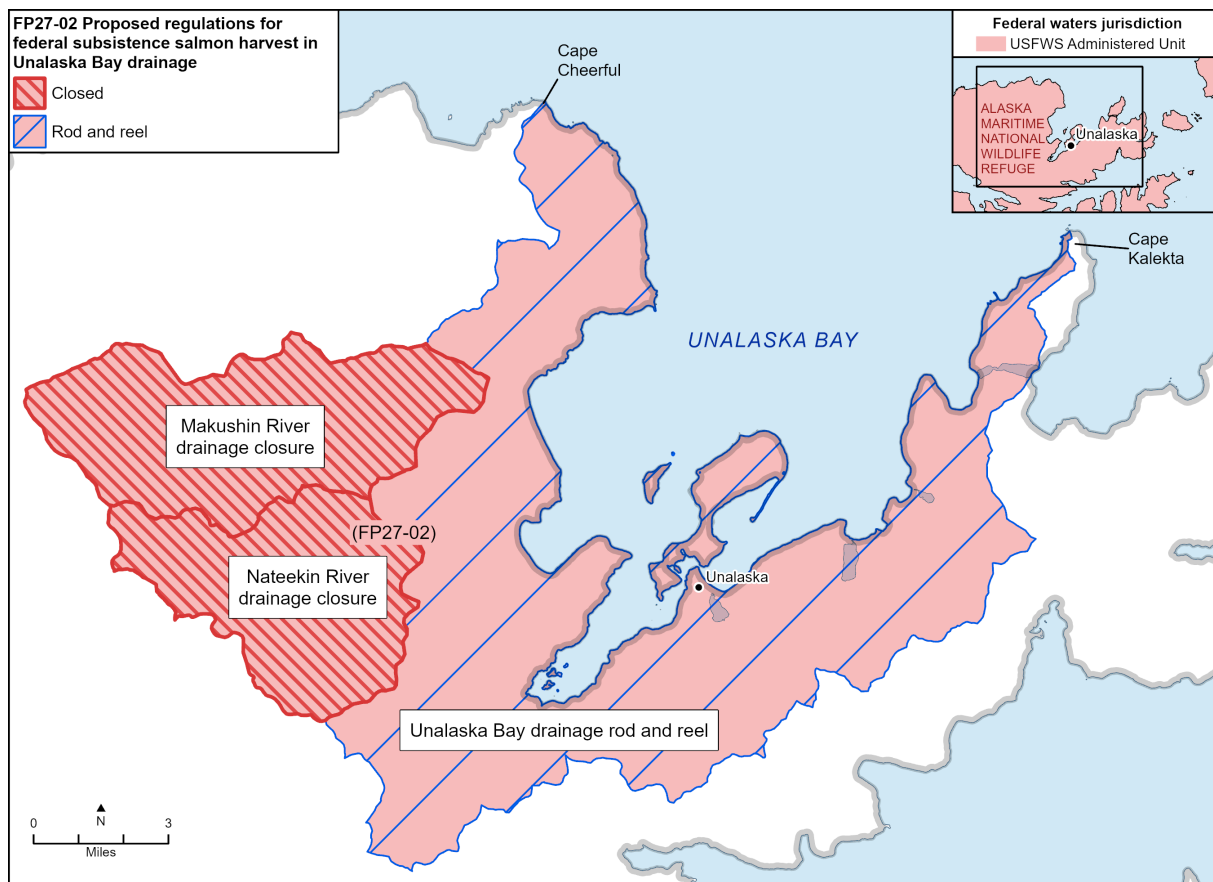


Figure 1. Fisheries proposal 27-02 would create a rod and reel subsistence fishery aligned with state sport fish regulations throughout freshwater drainages flowing into Unalaska Bay. Regulations would include closures of upstream portions of the Makushin and Nateekin river drainages. All Unalaska Bay freshwater systems are within the external boundaries of the Alaska Maritime National Wildlife Refuge.

Customary and Traditional Use Determinations

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 1999, the Federal Subsistence Board (Board) announced regulations for subsistence fishing in navigable waters with a Federal subsistence nexus (64 Fed. Reg. 5, 1307). Many of these initial regulations were carried over from State regulations (64 Fed. Reg. 5; 1284 [January 8, 1999]), including the closures at Summers, Morris, and Unalaska lakes (5 AAC 01.375).

In 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 Board approved a revised closure policy, which stipulated that all closures must be reviewed every four years. The policy also specified that closures, like regulatory proposals, would be presented to the Councils for a recommendation and then to the Board for a final decision. As a result, the Council reviewed the Unalaska Bay fisheries closure (FCR21-09) in 2020 and recommended deferring action to allow additional time for community input (KARAC 2020). The Board deferred FCR21-09 at their 2021 regulatory meeting in deference to the Council (FSB 2021).

In 2023, deferred Fisheries Closure Review FCR21-09 was brought back before the Board as FCR23-11. At this time, the Board voted to retain the closure, in deference to the Council’s fall 2022 recommendation. The Council’s decision was informed by community conservation concerns for run sustainability if harvest under area-wide regulations were permitted, as well as the need for increased law enforcement (KARAC 2022, 295-296).

Current Events

The Unalaska Bay closure was most recently reviewed during the Council’s winter 2026 meeting as a non-action item. The Council voted to submit this proposal (FP27-02), which would open much of the area to subsistence salmon fishing, and safeguard salmon populations by establishing more conservative harvest limits and methods than would otherwise be allowable under the general area-wide subsistence regulations. This regulatory change would also directly address the closure that is under review this cycle (FCR27-06) as it would remove much of the existing closure.

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 are displayed in **Table 1** below (Giefer and Evers 2025).

Table 1. Primary freshwater streams flowing into Unalaska Bay (Giefer and Evers 2025).

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

Unalaska Sockeye Salmon escapement estimates have generally declined since the mid-to-late 1980s, resurging in the early 2000s and again declining to present (Holmes 1997, Keyse et al. 2025). However, historical escapement information for smaller Unalaska systems, including many of the streams draining to Unalaska Bay, is limited by poor survey conditions, remote access challenges, and cost (Holmes 1998, Keyse et al. 2024). These streams are not included in ADF&G’s annual aerial indexing efforts. Much of what is known about these populations is inferred from a series of road

adjacent aerial drone surveys, and one year of Unalaska Lake weir data. From 2018–2023, Aleutian Aerial LLC conducted drone surveys to address the lack of Sockeye Salmon escapement data for Unalaska’s road system drainages (Lawson 2020; Fox et al. 2020, 2021, 2022; Keyse et al. 2024). The footage was reviewed by ADF&G and used to generate run estimates for Unalaska, Summers, and Morris lakes (**Table 2**). Additionally, a weir was installed at the mouth of Unalaska Lake in 2024 (Alaska Fish Count database, November 18, 2025). Cumulative Sockeye Salmon escapement counts as of July 31, 2025, were 2,441, a noticeable increase over previous drone indexed estimates (**Table 2**). While there are not enough years of drone and weir data to be able to draw conclusions about the relationship between these two methods, a comparison of drone and weir-collected data in the McLees and Iliuliuk lake systems indicates that drone surveys capture relative abundance trends over time, but underestimate run strength.

Table 2. Minimum Sockeye Salmon escapements at surveyed locations in Unalaska Bay from 2018–2023, based on aerial drone surveys. (Lawson 2020, Keyse et al. 2024). *Iliuliuk weir count data for the 2025 season are included on the last row (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
Drone Average	535	2,428	184
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 and Pribilof islands are located west of the Alaska Peninsula and are the homelands of the Unanga̋, 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 Unanga̋/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

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

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 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 Unanga/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 Unangax /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).

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).

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 3**). Ninety-two percent of surveyed households used salmon (**Table 3**). 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 4**).

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 3**). 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 4**).

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 3**). 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 3**). 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 3**). However, a higher proportion of households reported giving and receiving salmon in 2022 than in 2020 (**Table 3**). 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 4**). 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." In 2022, during the most recent subsistence survey period, subsistence fishers in the Unalaska District were limited to 25 salmon per permit holder under State regulations, of which no more than 10 could be Sockeye Salmon harvested from Front Beach in Unalaska Bay, plus an additional 25 salmon for each member of the same household whose name was listed on the permit, of which no more than 10 could be Sockeye Salmon harvested from Front Beach in Unalaska Bay (Keating et al. 2026: 6).²

² Under Federal regulations, subsistence fishers in the Unalaska District are generally limited to 25 salmon per permit holder, plus an additional 25 salmon per household member.

Table 3. 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 4. 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 5 and 6; 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 5**). 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 5. 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 6. 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.

Alternatives Considered

An alternative considered was to rescind the Unalaska Bay closure and allow harvest under existing Aleutian Islands Area Federal fisheries regulations. Unalaska District Federal subsistence regulations permit the harvest of up to 25 salmon plus an additional 25 salmon for each household member listed on a permit. Salmon may be harvested through a variety of means, including seine and gillnet. This alternative would provide priority consumptive use to federally qualified subsistence users. However, allowing this level of harvest could lead to overharvest and conservation concerns, particularly in small systems (KARAC 2022: 315-317). This scenario would rely heavily upon Federal in-season monitoring and management. The Federal in-season manager may issue emergency and temporary special actions to set provisions for the fishery such as stipulating gear types and setting harvest limits to promote conservation, continue subsistence uses, or maintain public safety (**Appendix 2**).

Effects of the Proposal

If adopted, this proposal would allow federally qualified subsistence users to harvest salmon from freshwater streams draining into Unalaska Bay under Federal subsistence regulations for the first time in 25 years. Some area restrictions would still apply, bringing Federal opportunity in line with State sport fishing regulations. However, the Federal in-season manager maintains authority to restrict or close the fishery to non-federally qualified users during times of conservation concern or to protect subsistence uses, thereby promoting meaningful priority for federally qualified subsistence users. Under Federal regulations, harvesters would not be required to obtain a fishing license. Community input suggests that these changes are unlikely to result in increased harvest pressure as rural users are already engaging in consumptive harvest practices under State regulations, mitigating any conservation concerns (Keating et al. 2022: 90-91).

OSM PRELIMINARY CONCLUSION

Support Proposal FP27-02

Justification

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." Since 2001, Unalaska Bay freshwaters have been closed to subsistence fishing under Federal regulations but open to non-subsistence uses. OSM considers this situation counter to ANILCA, and suggests the closure to subsistence uses of salmon in these systems needs to be lifted. This proposal would allow for subsistence opportunity while also implementing harvest regulations that should safeguard against conservation concerns. This poses no additional conservation concerns as federally qualified subsistence users may already fish for salmon under State sport fishing regulations.

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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 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.

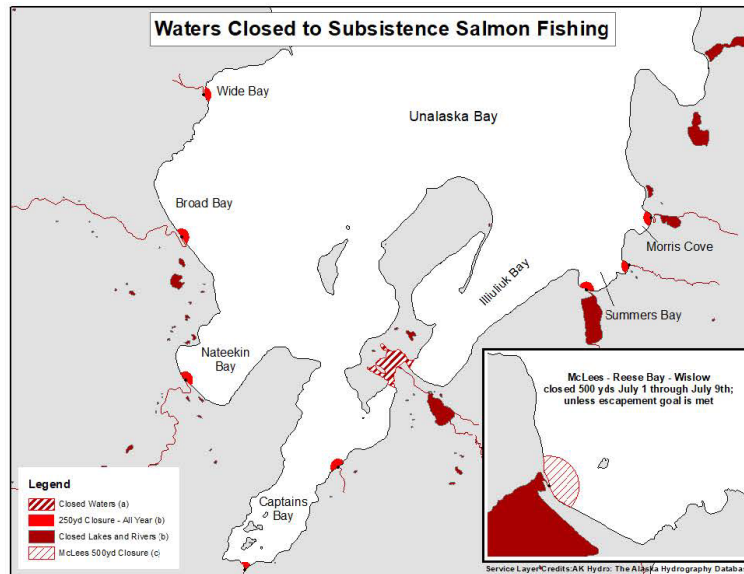
5 AAC 01.380. LIMITS TO NUMBER OF SALMON TAKEN: 25 salmon for the permit holder; of which no more than 10 sockeye salmon may be harvested from Front Beach in Unalaska Bay, plus an additional 25 salmon for each member of the same household whose name is listed on the permit, of which no more than 10 sockeye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



Federal Subsistence Board

1011 East Tudor Road, MS 121

Anchorage, Alaska 99503-6199



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

MAY 11 2023

In Reply Refer To:

OSM 23045

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 Federal Subsistence



Board 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