

FP27-08 Executive Summary

General Description	Proposal FP27-08 requests that the Federal Subsistence Board repeal Federal subsistence fishing regulations for the Unalakleet River weekly time restriction between June 1 through July 15 th . <i>Submitted by: Seward Peninsula Regional Advisory Council.</i>
Proposed Regulation	§____.27(e)(2)(ii) <i>Subsistence taking of fish.</i> <i>(A) In Subdistricts 2 through 6, if you are a commercial fishermen, you may not fish for subsistence purposes during the weekly closures of the State commercial salmon fishing season, except that from July 15 through August 1, you may take salmon for subsistence purposes 7 days per week in the Unalakleet and Shaktoolik River drainages with gillnets which have a stretched-mesh size that does not exceed 4 1/2 inches, and with beach seines;</i> <i>(B) In the Unalakleet River from June 1 through July 15, you may take salmon only from 8:00 a.m. Monday until 8:00 p.m. Saturday.</i> <i>(C) Federal public waters of the Unalakleet River, upstream from the mouth of the Chirosky River, are closed to the taking of Chinook salmon from July 1 to July 31, by all users. The BLM field manager is authorized to open the closed area to Federally qualified subsistence users or to all users when run strength warrants.</i>
OSM Preliminary Conclusion	Support FP27-08
Seward Peninsula Subsistence Regional Advisory Council Recommendation	
Interagency Staff Committee Comments	
ADF&G Comments	
Written Public Comments	None

DRAFT STAFF ANALYSIS

FP27-08

ISSUES

Fisheries Proposal FP27-08, submitted by the Seward Peninsula Subsistence Regional Advisory Council (Seward Peninsula Council), requests that the June 1 through July 15 time constraints for Unalakleet River salmon fishing starting at 8 a.m. Monday through 8 p.m. Saturday be removed to allow for subsistence salmon harvest access without time and day restrictions.

PROPONENT STATEMENT

The Seward Peninsula Council states that weather can limit harvest opportunities during the current restricted schedule. Subsistence salmon fishing is currently allowed only from 8 a.m. Monday to 8 p.m. Saturday, preventing harvest from 8 p.m. Saturday to 8 a.m. Monday. This proposal would add 36 hours of opportunity each week, enabling federally qualified subsistence users to fish at times that best suit their needs and avoid adverse weather conditions.

Current Federal Regulation

Norton Sound-Port Clarence Area

§ __.27(e)(2)(ii)

(A) In Subdistricts 2 through 6, if you are a commercial fishermen, you may not fish for subsistence purposes during the weekly closures of the State commercial salmon fishing season, except that from July 15 through August 1, you may take salmon for subsistence purposes 7 days per week in the Unalakleet and Shaktoolik River drainages with gillnets which have a stretched-mesh size that does not exceed 4 1/2 inches, and with beach seines;

(B) In the Unalakleet River from June 1 through July 15, you may take salmon only from 8:00 a.m. Monday until 8:00 p.m. Saturday.

(C) Federal public waters of the Unalakleet River, upstream from the mouth of the Chirosky River, are closed to the taking of Chinook salmon from July 1 to July 31, by all users. The BLM field manager is authorized to open the closed area to Federally qualified subsistence users or to all users when run strength warrants.

Proposed Federal Regulation

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(A) In Subdistricts 2 through 6, if you are a commercial fishermen, you may not fish for subsistence purposes during the weekly closures of the State commercial salmon fishing season, except that from July 15 through August 1, you may take salmon for subsistence purposes 7 days per week in the Unalakleet and Shaktoolik River drainages with gillnets which have a stretched-mesh size that does not exceed 4 1/2 inches, and with beach seines;

~~*(B) In the Unalakleet River from June 1 through July 15, you may take salmon only from 8:00 a.m. Monday until 8:00 p.m. Saturday.*~~

(C) Federal public waters of the Unalakleet River, upstream from the mouth of the Chirosky River, are closed to the taking of Chinook salmon from July 1 to July 31, by all users. The BLM field manager is authorized to open the closed area to Federally qualified subsistence users or to all users when run strength warrants.

Current State Regulation

5 AAC 01.160. Fishing seasons and periods

(b) In the Norton Sound District, fish may be taken at any time except as follows:

(2) in Subdistricts 2 - 6, commercial fishermen may not fish for subsistence purposes during the weekly closures of the commercial salmon fishing season, except that from July 15 through August 1, commercial fishermen may take salmon for subsistence purposes seven days per week in the Unalakleet and Shaktoolik River drainages with gillnets which have a mesh size that does not exceed four and one-half inches, and with beach seines;

(3) in the Unalakleet River from June 15 through July 15, salmon may be taken only during periods established by emergency order from 8:00 a.m. Monday until 8:00 p.m. Tuesday and from 8:00 a.m. Friday until 8:00 p.m. Saturday;

(6) notwithstanding the provisions of (2) and (3) of this subsection, in Subdistricts 5 and 6, salmon other than king salmon may be taken from July 1 through August 10 by beach seine with a mesh size no larger than four and one-half inches; all king salmon caught must be returned immediately to the water alive; if the commissioner determines that it is necessary for the conservation of king salmon, the commissioner may, by emergency order, close the season and immediately reopen the season during which the fishing time, area, and beach seine mesh size may be adjusted;

5 AAC 70.011 Northwestern Area – Sport Fishing

(c) The following are the exceptions to the general bag, possession, and size limits, and fishing seasons specified in (a) and (b) of this section for the Northwestern Area:

(9) in the Unalakleet River drainage,

(A) the bag and possession limit for king salmon is two fish, of which only one fish may be 20 inches or greater in length;

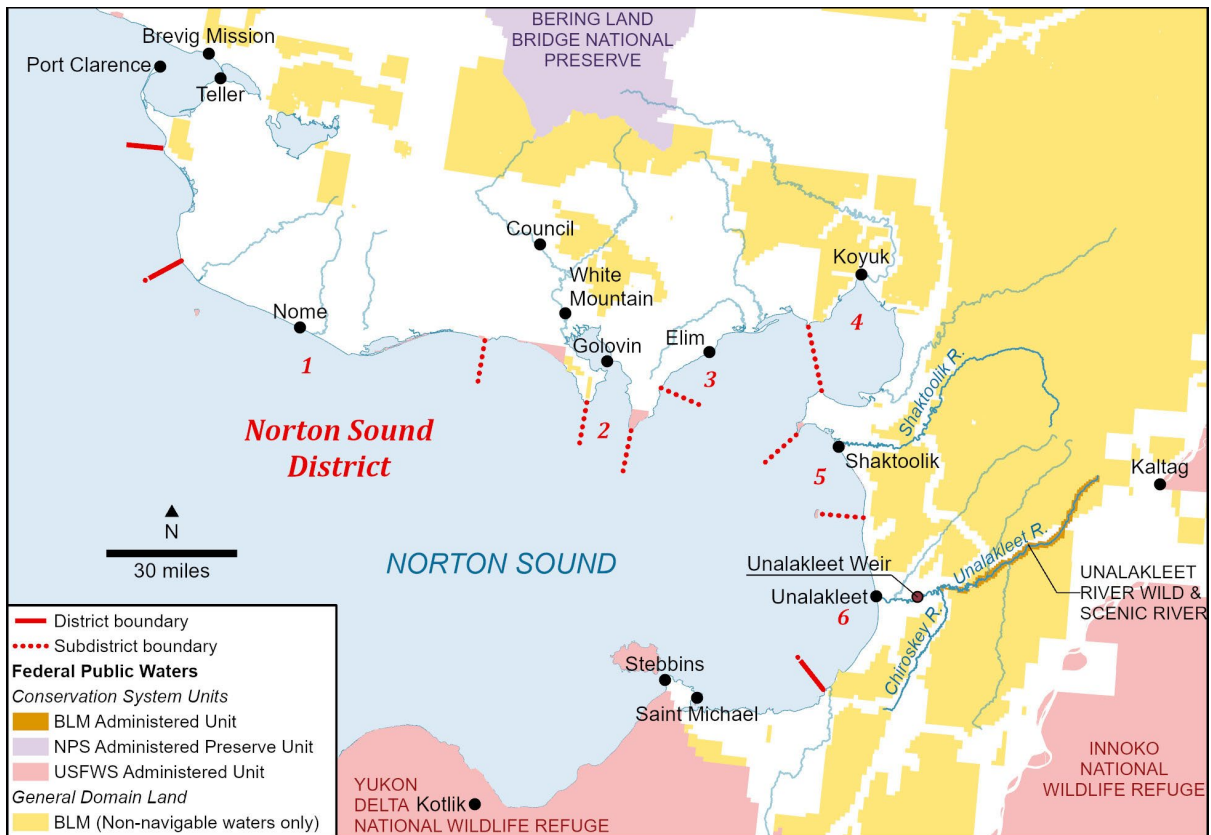
(B) the annual limit for king salmon 20 inches or greater in length is two fish; an angler fishing for king salmon must possess and complete a current year's nontransferable harvest record as described in 5 AAC 75.006;

(C) the bag and possession limit for salmon, other than king salmon, is 10 fish, of which only four fish, in combination, may be coho, chum, and sockeye salmon;

(D) a salmon removed from the water must be retained and becomes part of the bag limit of the person originally hooking it; a person may not remove a salmon from the water before releasing it;

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. For the Unalakleet River, Federal public waters include the upper 81 river miles of the Unalakleet River and its tributaries (106 river miles in total length) (**Map 1**). This portion of the mainstem is designated a National Wild and Scenic River and is administered by the Bureau of Land Management (BLM).



Map 1. Norton Sound/Port Clarence regional map showing ADF&G subdistricts 1 through 6 along with Federal land jurisdictions.

Customary and Traditional Use Determinations

Residents of the Norton Sound-Port Clarence Area have a customary and traditional use determination for salmon in the Unalakleet River.

Regulatory History

In 1992, the Federal Subsistence Management Program carried over the State regulations governing the harvest of fish for subsistence uses (57 Fed. Reg. 103, 22564 [May 28, 1992]). The Norton Sound-Port Clarence Area regulation under consideration in this analysis was incorporated into Federal regulations in this manner. The intent of a 36-hour closure to harvesting salmon and when it was enacted are unknown; however, it is speculated to allow passage of salmon into the Unalakleet River.

Federal public waters of the Unalakleet River were closed to the taking of Chinook Salmon through Special Action authority in 2006 through 2008. Proposal FP09-14 was submitted by Kathy Johnson on behalf of the Native Village of Unalakleet. The original proposal applied only to non-federally qualified users and suggested an earlier closure window. The request was subsequently modified by the proponent to reflect a closure to all users from July 1 to 31. The proponent submitted this proposal as a conservation measure to provide Chinook Salmon additional protection while traveling to spawning grounds. At its January 2009 meeting, the Federal Subsistence Board (Board) adopted this proposal

with modification, as recommended by the Seward Peninsula Council, and with additional Board modification to specifically delegate authority to the BLM field office manager to provide management flexibility. The closure became effective April 1, 2009.

Periodic review of the 2009 closure began in 2021 with Fisheries Closure Review FCR21-01. During the Seward Peninsula Council fall 2020 meeting, the Council acknowledged the healthy return of Chinook Salmon to the Unalakleet River in 2019. The Seward Peninsula Council was concerned, however, that due to COVID-19 pandemic, the weir operation the previous summer had both gear and count limitations and could not be relied upon to provide any updated trend information. The Council believed that until Chinook Salmon returns display consistently increased trends through time, the regulatory closure should remain in place. The Seward Peninsula Council was also concerned about smaller sized fish, which could represent a systemic issue for this population (SPRAC 2024). Due to these reasons, the Seward Peninsula Council recommended maintaining the status quo for this closure. The Board subsequently maintained this closure to all users in deference to the Seward Peninsula Council (FSB Board 2025).

The Seward Peninsula Council took up the closure again at its fall 2024 meeting (FCR25-01) and recommended again to maintain status quo. The Seward Peninsula Council supported retaining the closure because of the severe conservation concern over Chinook Salmon in the Unalakleet River. As stated by Council members, there are no fish to harvest and, as the Council member from Unalakleet noted, there is a prevalence of “little jack Kings” over the once plentiful “huge salmon” she recalls from her youth. The Seward Peninsula Council also noted continued concerns over weather changes and increased high-water events in the river systems, trawlers, and the interception of Chinook Salmon in commercial fisheries (SPRAC 2024). The Board maintained status quo of FCR25-01 in deference to the Seward Peninsula Council (Board 2025).

Current Events Involving the Species

In spring 2025, the Unalakleet Native Corporation (UNC) Board requested that the Alaska Department of Fish and Game (ADF&G) discontinue adult salmon weir operations on the Unalakleet River and consider methods that do not disrupt salmon migration, boat traffic, and run timing of salmon (Henslee 2025). Because UNC owns the weir site, Chinook Salmon enumeration ended in 2025.

ADF&G is currently evaluating alternatives, including hydroacoustic surveys using DIDSON sonar at a different location. If a downriver site can effectively capture both the mainstem and North River runs, this approach could provide a more complete estimate of Chinook Salmon escapement.

Biological Background

Federal waters include the upper 81 river miles of the Unalakleet River, which is designated a National Wild and Scenic River and administered by the BLM. This portion of the river contains spawning habitat used by Chinook Salmon. Returns of Chinook Salmon to the drainage have been poor since 2000. Norton Sound Subdistricts 5 and 6 are identified as stocks of yield concern for Chinook Salmon by ADF&G. Anadromous Pink, Coho, Chum salmon and resident Dolly Varden, Arctic Grayling and

whitefishes are also present in the river and considered important subsistence harvested fish for Unalakleet.

Until 2024, Chinook Salmon were enumerated using a floating resistance board weir located approximately 22 km upstream from the mouth of the river. Run timing of Chinook Salmon begins in mid to late-June, peaks in early to mid-July, and ends in late July (**Figure 1**). There is not an escapement goal for Chinook Salmon in the mainstem of the Unalakleet River, and weir counts have ranged from 66 to 6,641 fish since 2010. The escapement of 6,641 fish in 2019 was the highest on record while the lowest return of 66 fish occurred in 2023 (**Table 1**). In 2020, the weir did not operate due to the Covid-19 pandemic. Commercial and sport fishing closures and increasingly restrictive subsistence fishing opportunities have not resulted in increased escapements.

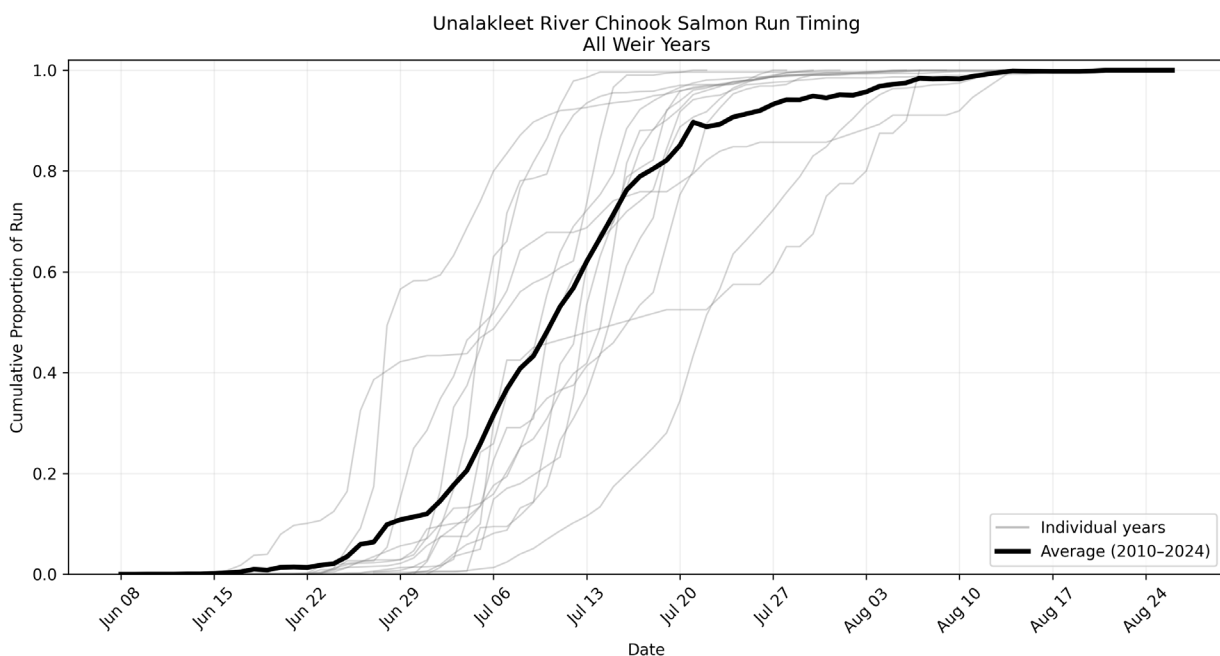


Figure 1. Unalakleet River Chinook Salmon run-timing showing years 2010-2024 in gray lines and average cumulative escapement over those same years shown on the black line (ADFG 2026).

One of the largest tributaries to the Unalakleet River is the North River, where a counting tower is the primary tool for monitoring escapement of adult salmon. Radio telemetry studies in 1997-1998 estimated 39% of Chinook Salmon that spawn in the drainage are utilizing the North River (Wuttig 1999). In later studies, upwards of 58% of returning adult Chinook Salmon entered the North River, leaving speculation that more Chinook Salmon possibly utilize the North River than previously expected (Joy & Reed 2014). A sustainable escapement goal (SEG) of 1,200 – 2,600 Chinook Salmon was established, however was not met in 8 of the last 11 years (2015-2024).

Table 1. Chinook Salmon estimated escapement into the Unalakleet River 2010-2026 (Henslee 2025).

Year	Unalakleet River Weir Count	Year	Unalakleet River Weir Count
2010	1,021	2019	6,641
2011	1,111	2020	N/A
2012	815	2021	518
2013	667	2022	119
2014	1,126	2023	66
2015	2,789	2024	320
2016	505	2025	Unknown
2017	2,934	2026	Unknown
2018	3,326	-	-

*2024 was the last year of weir operations. 2020 season was disrupted from the Covid-19 pandemic. (-) indicate no data.

Pink salmon are widely distributed throughout the Norton Sound region, including the Unalakleet River drainage, and generally exhibit greater natural abundance than Chinook Salmon. Unlike other Pacific salmon species, Pink Salmon have a fixed two-year life cycle, with adults returning to freshwater to spawn at age two. As a result, returns naturally fluctuate between even- and odd-year brood lines, with one brood line often producing substantially larger returns than the other. Adult Pink Salmon typically begin entering the Unalakleet River during late June, with abundance increasing through July and peaking during mid- to late July. Consequently, Pink Salmon are present during portions of the June 1 through July 15 regulatory period addressed by this proposal, although the largest component of the run generally occurs later in July.

Pink Salmon are harvested for subsistence, commercial, and sport purposes throughout Norton Sound when abundance allows. In the Unalakleet River, subsistence users primarily harvest Chinook Salmon during June and early July, with pink salmon becoming increasingly available as the season progresses. Commercial harvest of Pink Salmon has varied considerably among years and generally reflects the strength of annual returns and market conditions rather than management objectives directed specifically at Pink Salmon. Recent ADF&G summaries indicate that Pink Salmon returns across Norton Sound have been below average in several recent years, although localized escapement objectives have continued to be achieved in some systems, demonstrating that annual productivity varies among watersheds. During the 2025 season, Pink Salmon returns throughout Norton Sound were characterized as below average; however, the Kwiniuk River Pink Salmon escapement goal was achieved, indicating that while regional abundance was reduced, some populations continued to meet biological objectives.

Because Pink Salmon are generally more abundant than Chinook Salmon and their peak migration typically occurs after much of the early Chinook migration has passed, management actions within the Unalakleet River have historically been driven by conservation concerns for Chinook Salmon rather than Pink Salmon abundance. Existing regulations, including the July 1 through July 31 closure to the retention of Chinook Salmon in Federal public waters upstream of the Chirosky River, are intended to

provide additional protection for Chinook Salmon during their upstream migration while allowing harvest opportunities for other salmon species when conservation concerns permit. Consequently, changes to the weekly fishing schedule proposed under FP27-08 are expected to primarily affect the timing and flexibility of subsistence harvest opportunity rather than the biological status of Pink Salmon populations, although increased fishing opportunity during periods of Pink Salmon availability could increase the incidental harvest of this species when run strength is sufficient.

Chum Salmon are one of the principal salmon species returning to the Unalakleet River and contribute substantially to subsistence, commercial, and sport fisheries throughout the Norton Sound region (Scanlon 2025; Clark and Henslee 2025). Most adult Chum Salmon return to spawn between 3 and 5 years of age after rearing briefly in freshwater and migrating to the marine environment as juveniles. Upon returning to freshwater, adults cease feeding and migrate to spawning areas throughout the Unalakleet River drainage, where spawning generally occurs in mainstem reaches and tributaries with suitable gravel substrate and groundwater influence. Juvenile Chum Salmon typically emigrate to marine waters shortly after emergence, resulting in relatively limited freshwater residence compared to Chinook Salmon or Coho Salmon. Although their freshwater life history is brief, Chum Salmon are an ecologically important component of the watershed and provide seasonal marine-derived nutrients to freshwater and riparian ecosystems following spawning.

The Unalakleet River supports one of the more important Chum Salmon populations in southern Norton Sound and has historically provided harvest opportunities for subsistence users while also contributing to commercial fisheries in Subdistrict 6 when abundance permits (Scanlon 2025). However, Chum Salmon abundance has exhibited substantial interannual variability, and recent returns throughout Norton Sound have generally been below long-term averages (Clark and Henslee 2025). During the 2025 season, the Norton Sound commercial harvest included 5,969 Chum Salmon, approximately one-third of the recent 5-year average, and salmon returns throughout the region were characterized as weak for Chum Salmon (Clark and Henslee 2025). Although the Unalakleet River has continued to support subsistence harvest opportunities, conservative fishery management has been implemented in recent years to provide for escapement and sustained production during periods of reduced abundance.

Within the Unalakleet River, Chum Salmon remain an important resource for federally qualified subsistence users and contribute to the diversity of salmon available during the summer harvest season. Management of Chum Salmon is based on providing adequate escapement while allowing harvest opportunity when run strength is sufficient. Because annual returns can vary considerably in response to freshwater and marine survival, managers continue to evaluate inseason run strength using harvest information, escapement monitoring, and local observations when determining fishing opportunities. While recent conservation concerns in the Unalakleet River have focused primarily on Chinook Salmon, the continued productivity of Chum Salmon remains important for sustaining subsistence uses and maintaining fishing opportunities across multiple user groups.

Coho Salmon are an important component of the Unalakleet River and support subsistence, commercial, and sport fisheries throughout the Norton Sound region (Scanlon 2025). In the Unalakleet

River, Coho Salmon provide an important late-summer harvest opportunity for federally qualified subsistence users and contribute substantially to annual salmon harvests when run strength is sufficient. Commercial fisheries within Norton Sound also rely heavily on Coho Salmon, with harvest opportunities occurring after adequate escapement has been provided to spawning populations. The continued productivity of Coho Salmon supports harvest opportunities across multiple user groups while contributing to the long-term sustainability of the Unalakleet River fishery.

Recent monitoring indicates that Coho Salmon populations have generally remained more productive than Chinook Salmon throughout much of Norton Sound. During the 2025 season, Coho Salmon comprised the majority of the Norton Sound commercial salmon harvest, with 31,523 fish harvested commercially, while tower-based Coho Salmon escapement goals were achieved in Subdistricts 3 and 6 (Clark and Henslee 2025). Although annual abundance varies in response to freshwater and marine survival conditions, recent returns have generally supported subsistence, commercial, and sport fisheries when management objectives for escapement are achieved.

Within the Unalakleet River, Coho Salmon remain an important resource for subsistence users and provide harvest opportunities later in the season. Fishery managers evaluate annual run strength using harvest information, escapement monitoring, and inseason assessment projects to ensure sufficient escapement while providing harvest opportunity when abundance permits. Consequently, Coho Salmon continue to represent a biologically productive and socially important component of the Unalakleet River salmon fishery and contribute to the diversity of salmon resources available to federally qualified subsistence users.

Cultural Knowledge and Traditional Practices

The community of Unalakleet is located at the mouth of the Unalakleet River in eastern Norton Sound. The Kaltag Portage, an important traditional trade route, ran from Kaltag along the Unalakleet River, ending at Unalakleet (Pratt 2012). Since the mid-nineteenth century the Unalakleet River has marked a rough linguistic boundary between speakers of Iñupiaq to the north and Central Yup'ik speakers to the south (Woodbury 1984). In 2025, the estimated population of Unalakleet was 652 (ADLWD 2026).

In 2020, the most recent year for which data are available, residents of Unalakleet subsistence fishing in the Unalakleet Subdistrict harvested the greatest number of Pink Salmon, followed by Coho and Chinook salmon (Brown et al. 2023). A smaller number of Chum and Sockeye salmon were also harvested (Brown et al. 2023). Of these species, Chinook, Chum, and Pink salmon usually run during the period affected by this proposal, June 1 through July 15 (in the order listed). Chinook Salmon are highly valued by the community (SPRAC 2016, BLM 2026).

Through interviews conducted in 2008 and 2009 and updated in 2014, Kawerak, Inc. social scientists documented Unalakleet's Traditional Ecological Knowledge about salmon (Raymond-Yakoubian and Raymon-Yakoubian 2015). Unalakleet knowledge holders shared that returns of Chinook Salmon had become less abundant and smaller over time. Decreased abundance was first noticed in the 1980s and 1990s. Knowledge holders also shared that an increasing portion of Chinook harvested were "Jack Kings." They observed that herring in Chinook Salmon's stomachs had become smaller over time, and,

in some cases, the salmon's stomachs were empty. Because of serious concerns over the Chinook Salmon population, "a number of people in Unalakleet have self-imposed restrictions on their harvest of varying levels (including not fishing for them at all) to ensure the preservation of the king runs" (Raymond-Yakoubian and Raymon-Yakoubian 2015: 122). In their Indigenous Knowledge assessment for Unalakleet, Mustonen and Van Dam reported a surge of Chinook Salmon in 2019 (2021).

Pink Salmon arrive after Chinook Salmon and make up a significant portion of many peoples' subsistence harvest in Unalakleet. They are harvested by seining for them in rivers and are sought after for making dry fish (Raymond-Yakoubian and Raymon-Yakoubian 2015). Large Pink Salmon mortality events occurred in the region in 2019 due to warm water temperatures (Mustonen and Van Dam 2021, SPRAC 2023). Local residents observed declines in Chum Salmon after the mid-1990s, following the initial decline in Chinook Salmon. However, around 2014 the runs improved, as did Chum harvest levels (Raymond-Yakoubian and Raymon-Yakoubian 2015).

Residents have expressed concerns both about warmer water temperatures and reduced oxygen killing salmon and about beaver dams affecting salmon returns (Raymond-Yakoubian and Raymon-Yakoubian 2015). Overall, residents of Unalakleet reported that all species of salmon used to be larger and more abundant in their region (Raymond-Yakoubian and Raymon-Yakoubian 2015). The Chair of the Council voiced his concern about salmon in the context of the wider Norton Sound region: "All I know is there's good, great salmon runs up north of us and there's great sockeye runs in Bristol Bay but in the middle, Norton Sound, Yukon, and Kuskokwim something's really wrong out there" (SPRAC 2023).

Harvest History

Subsistence

The majority of Chinook Salmon subsistence harvest used to occur under State jurisdiction in marine waters at the mouth of the Unalakleet River. Since the early 2000's, restrictions to the State subsistence fishery have often been required to reach escapement on the Unalakleet River. These restrictions have led to drastic reductions in harvest and in 2024, only 142 Chinook Salmon were harvested from Subdistrict 6 (Unalakleet), which is the lowest level on record.

Monitoring of subsistence harvest of salmon in the Norton Sound District is conducted by the ADF&G Division of Subsistence by permits, which are then returned to the Division of Commercial Fisheries. From 2019 through 2023, there was an average of 39,354 fish harvested for subsistence in the District (Clark et al. In prep). For 2024, there was an increase in harvest where 52,426 salmon were harvested in the Norton Sound District. Of this harvest, 191 Chinook, 716 Sockeye, 12,204 Coho, 32,096 Pink and 7,219 Chum salmon.

The primary method for monitoring subsistence harvest in the Unalakleet Subdistrict is through postseason salmon harvest surveys, which are conducted annually by ADF&G Division of Commercial Fisheries. Results are published annually by Division of Subsistence (Fall et al. 2019, Fall et al. 2020, Brown et al. 2021, Brown et al. 2022, Brown et al. 2023). **Table 2** shows the results of these surveys

for all salmon harvested for subsistence within the Unalakleet Subdistrict from 2016 to 2020. Data for years after 2020 are not yet available. In terms of the number of fish harvested, on average, Pink Salmon made up 48% of the harvest, followed by Coho Salmon (32%) and Chum Salmon (12%) (Fall et al. 2019, Fall et al. 2020, Brown et al. 2021, Brown et al. 2022, Brown et al. 2023). Chinook Salmon made up 6% of the harvest, and 2% of the harvest was Sockeye Salmon (Fall et al. 2019, Fall et al. 2020, Brown et al. 2021, Brown et al. 2022, Brown et al. 2023).

Table 2. Chinook Salmon and total salmon subsistence harvest within Subdistrict 6 (Unalakleet Subdistrict) from 2016 to 2020, as documented in postseason subsistence surveys (Fall et al. 2019, Fall et al. 2020, Brown et al. 2021, Brown et al. 2022, Brown et al. 2023).

Year	Number of Pink Harvested	Number of Coho Harvested	Number of Chinook Harvested	Number of Chum Harvested	Number of Sockeye Harvested	Total Number of Salmon Harvested
2020	9,959	4,511	1,917	739	411	17,537
2019	7,971	5,525	1,444	1,776	565	17,281
2018	5,017	5,204	810	2,227	235	13,493
2017	11,069	8,680	496	3,625	304	24,174
2016	10,783	6,623	687	3,058	352	21,503
Avg	8,960	6,109	1,071	2,285	373	18,798

While postseason surveys are regularly conducted by ADF&G for the Unalakleet Subdistrict, only one comprehensive subsistence survey has focused on salmon harvest by residents of Unalakleet. This survey was conducted by Kawerak, Inc. for the 2006 study year (Ahmasuk and Trigg 2007). That year, 96% of surveyed households in Unalakleet used salmon, and 80% attempted to harvest them. Salmon made up 38% of the community's total wild food harvest and were widely shared. In terms of edible weight harvested, Pink Salmon was the most important species harvested, followed by Coho, Chinook, and Chum salmon.

The Unalakleet and Shaktoolik Subdistricts are managed as one fishery by the ADF&G because past studies have shown that salmon bound for these subdistricts intermingle (Menard et. al. 2020). Beginning in 2004, the Alaska Board of Fisheries (BOF) identified Chinook Salmon in the Unalakleet and Shaktoolik subdistricts as stocks of yield concern. In February 2007, the BOF reconfirmed the identification of Unalakleet and Shaktoolik Chinook Salmon as stocks of yield concern (Menard 2007). The BOF took further action at its February 2007 meeting to increase escapement by adopting a more conservative Chinook Salmon management plan (5AAC 04.395). Under the new management plan, a subsistence fishing schedule was placed into regulation, as well as reductions in the sport fishing daily bag and annual possession limits. Additionally, commercial fishing directed at Chinook Salmon can only occur if ADF&G projects the midpoint of the North River tower sustainable escapement goal range will be achieved.

Commercial

Due to low numbers of returning Chinook Salmon, the commercial directed fishery has been closed since 2005 (Menard 2020). Salmon returns in 2025 supported Chum and Coho salmon commercial fisheries in Subdistrict 6. The 2025 Norton Sound-Port Clarence Salmon Season Summary provided by ADF&G noted that other species were harvested incidentally (Clark 2025). During 2021-2025 there was an average of 12 Chinook Salmon accidentally harvested during the Chum Salmon commercial openings. This was a decrease from the 2011-2020 average of 426 Chinook Salmon (Henslee 2025). Due to the poor Chinook and Chum salmon runs, the Unalakleet subdistrict 6 had to forgo their early season openings to allow additional escapement and subsistence opportunities. Commercial fishing began on July 29. There was a total of 11 commercial fishing periods that targeted Coho Salmon with 6-inch mesh or smaller gear. There was a total of 36 permit holders in Unalakleet and the commercial harvest was 61 Sockeye, 602 Chum, and 13,833 Coho Salmon, which was the largest Coho harvest since 2019.

Sport

Closures on Chinook Salmon sport harvest have been implemented in ten of the last 12 years (2015-2026). Incidentally caught Chinook Salmon during those years were to remain in the water and released immediately. The Unalakleet River is the most heavily used river system by sport fishermen in the Northwest region, and currently there are two lodge operators on the Unalakleet River drainage that can handle up to 24-26 guests at a time. The primary targeted fish is Coho Salmon. Angler effort average 2,228 days during 2019-2023 (Scanlon 2025). Sport fishing harvest and effort data is collected at the end of the season from anglers by ADF&G during the statewide sport fish harvest mail in survey.

Effects of the Proposal

If adopted, federally qualified subsistence users would have an additional 36 hours of fishing opportunity per week from June 1 through July 15 in the Federal public waters of the Unalakleet River (**Figure 2**). This weekly 36-hour increase would add 9 additional fishing days over the current Federal regulations. One of the intended consequences of this proposal is to alleviate federally qualified subsistence users from having to risk fishing during storms or putting away fish during inclement weather. It is unlikely that an increase in catch would occur due to this change because people would choose better times to harvest fish.

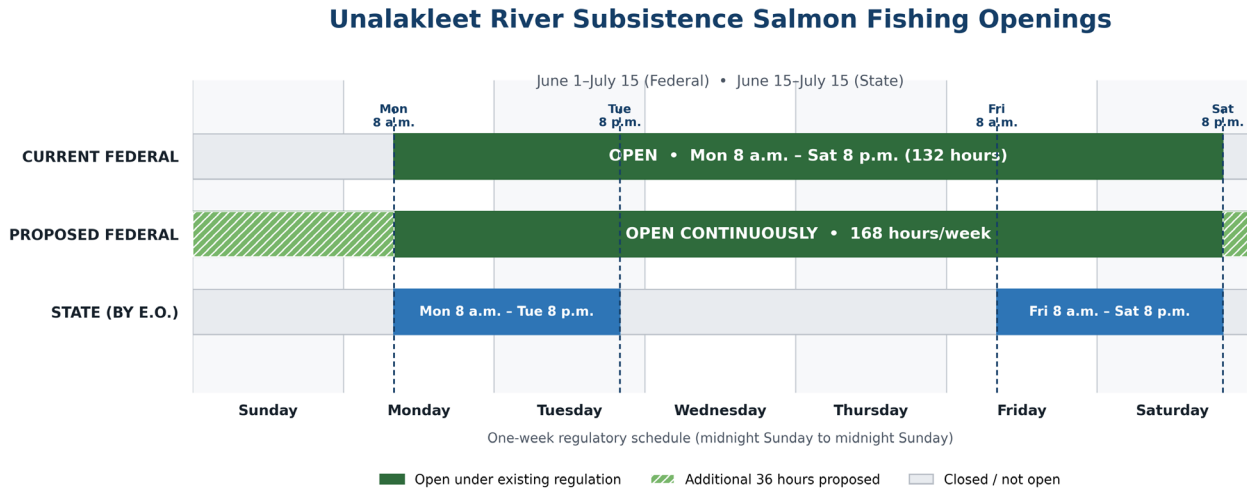


Figure 2. Comparison between State and Federal openings in the Unalakleet River. Green hatch in the Federal subsistence opening indicates the additional time (36-hours) proposed per week.

OSM PRELIMINARY CONCLUSION

Support Proposal FP27-08

Justification

By eliminating the weekly time constraints and allowing continuous access to the Unalakleet River fishery from June 1 through July 15, federally qualified subsistence users would have greater flexibility to harvest and process fish during favorable weather and river conditions, increasing subsistence opportunity. In western Alaska, rapidly changing weather, rough water, and prolonged rain events can substantially affect safe access to fishing areas and the ability to preserve fish. Additional opportunities on the weekends may also improve access for users working Monday through Friday schedules.

The proposed change is not expected to substantially increase total harvest of salmon. Rather, it is expected to redistribute harvest effort into safer weather windows and more favorable processing conditions. Harvest effort within Federal public waters is naturally constrained by travel distance, fuel costs, weather, and the remote upriver location of these Federal fisheries. This change would not affect the existing Federal Chinook Salmon closure from July 1 through July 31 upstream from the mouth of Chirosky River. For these reasons, OSM concludes the proposal would improve subsistence fishing flexibility and safety while maintaining existing conservation protections for Chinook Salmon.

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