
ALASKA BOARD OF FISHERIES
Bristol Bay Finfish Meeting
Anchorage | January 13-18, 2026

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Submitted by: Brad Ackman

Togiak River Lodge, Jordan Larsen CEO

Community of Residence: I live in Kenai, the drainage in question is the Togiak River

Proposal 102, SUPPORT

Dear ADF&G,

The Togiak River is obviously governed by the State of Alaska. However, the REAL "care takers" of the river are the owners and staff of Togiak River Lodge. Jordan Larsen and his crew have been caring for the Togiak River watershed and its fisheries for years in a professional, consistent, and dedicated way and the river is FAR BETTER for their efforts. I've been fishing the Togiak since well before the Larsen era and while the fishing was always great, all sorts of "harvest" practices were taking place that would make your skin crawl. That nonsense has ceased, thanks to the diligence of the Larsens. They are a fabulous steward of the resource. I am largely a fly fisherman for silvers, so Proposal 102 would not affect me in a significant way. However, I can state with complete certainty that if the Larsens are proposing a modification to regulations, their proposal has been well thought-out, thoroughly examined, and will benefit the river, the fish, and the anglers.

I appreciate your time,

Brad Ackman, Kenai

Submitted by: Dan Agen

Community of Residence: Washington

Proposal 70 support , it's long over due

Proposal 72 support

Proposal 73 support

Proposal 75 support

Proposal 76 support

Proposal 44 oppose

Proposal 61-69 oppose

Submitted by: Emily Agen

Community of Residence: Washington

Proposal 70, support its long overdue proposal 72 support

proposal 73 support

proposal 75 support

Proposal 76 support

proposal 44 oppose

proposal 61 through 69 oppose

PC4

Submitted by: Karen Agen

Community of Residence: Washington

Proposal 70 support, it's long overdue

Proposal 72 support

Proposal 73 support

Proposal 75 support

Proposal 76 support

Proposal 44 oppose

Proposal 61–69 oppose



Gerald Ball, President and Owner

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December 29, 2025

Chair Märit Carlson-Van Dort
Alaska Board of Fisheries

RE: Proposal #65
Comments and Suggested Modifications

Chair Carlson-Van Dort:

Alaska's Best Seafood (ABS) is a salmon processing company located on the northern end of Ekuk Beach in Bristol Bay, and is Alaskan owned by a third-generation Dillingham Alaskan family. My family's processing facility provides a market for 103 salmon set gillnet permit holders that fish on Ekuk Beach in the Nushagak District. Approximately two-thirds of these fishermen are local watershed residents or reside elsewhere in Alaska. Traditional set gillnet harvesting on Ekuk Beach, which goes back more than five generations, is conducted utilizing trucks and tractors, rather than skiffs.

The purpose of Proposal #65 is designed to address the Nushagak District Allocation Plan (5 AAC 06.367) for sockeye salmon between drift gillnet and set gillnet fisheries which was created by the Alaska Board of Fisheries in the 1990's. An intent established by the board states in 5 AAC 06.355 (b), *"It is the intent of the Board of Fisheries (board) that Bristol Bay sockeye salmon be harvested in traditional harvest locations..."*, and (d) (3), *"distribute fish within individual districts and subdistricts through the spacing and duration of openings."*

The proposal has two parts; address a better way to achieve the goals of the allocation plan and to not include the Wood River Special Harvest Area (WRSHA) from the calculations in managing for the allocation between set and drift.

In recent years the allocation has not been achieved and the Nushagak setnet harvesters have lost 6.1% from the adopted 26% in the Allocation Plan. This represents a 23% loss of harvest

share. This is due in large part to the increased by drift gillnet effort, many of which have significantly upgraded their vessels to become much more efficient. Additionally, the accuracy and confidence of the Port Moller Test Fishery allow a determination for when and where to concentrate their efforts.

Data from the Bristol Bay Science and Research Institute's "Performance Assessment of the 2023 Nushagak District King Salmon Stock of Concern Management Plan" has shown that even with increased vessel effort by the drift fleet, setnet fishing time has decreased disproportionately. From 2023 to 2025, fishing through July 5th has resulted in a reduction of around 37% fishing time in the drift gillnet fleet, while the setnet fleet has had their time reduced by 46%.

The management for harvest over the last five years has had unintended consequences for the set gillnet harvesters in the Nushagak District, with the Allocation Plan being placed on a lower priority when confronted with possible foregone harvest. This has resulted in significant changes in management style over the last five years and has created more of a "line fishery" with more drift effort on the southern boundary line, and even more so in the last three years. The consequence has been the restriction in the ability for salmon to enter into and distribute within the full Nushagak District.

Allocation Plan Based on Management of Chinook Conservation :

We recognize that the prescriptive language placed in proposal 65 to better achieve the allocation. After discussions with industry and the department, we feel other options merit consideration.

These ideas do not change the King Salmon Stock of Concern Management Plan but could provide a way to achieve the goals of the Allocation Plan between set and drift gillnet harvesters. We believe they would also provide benefit in the efforts to decrease Chinook harvest.

1. In the early part of the season, modify the drift fleet's opening time. Consider opening the drift fleet at high water, instead of an hour or two before high water. This would accomplish two things. Salmon would have more time to move into and throughout the district and the setnet harvesters would have time to harvest sockeye before the drift fleet begins fishing and cuts off access. This simple action could help with the allocation disparity. This would also allow Chinook more time to migrate through the district during the flood tide.
2. In the early part of the season restrict the drift fishery from low tide fishing, as is the case in the Naknek-Kvichak District. This would allow sockeye to begin their movement into the district without being harvested on the southern line, while also providing protection for Chinook traveling in the deeper water of the channels.

Wood River Special Harvest Area:

Our small processing operation depends on deliveries of sockeye from the Ekuk harvesters in order to stay in business and by including the WRSWA in the allocation calculations, our business is being harmed. We believe the WRSWA harvest should not be counted in the allocation between drift and set gillnetters in the Nushagak District. Shown below are some reasons for this recommendation:

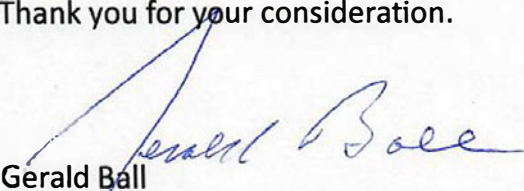
1. When the Allocation Plan was adopted, the WRSWA was not included in the historical distribution between drift and setnet harvesters. The WRSWA was not officially part of the Nushagak District until 2018.
2. As stated earlier, the setnetters on Ekuk Beach fish with vehicles, rather than skiffs, and have no access to the WRSWA. This does not provide equal opportunity and can be considered allocative within the set gillnet fleet.
3. In recent years, the WRSWA opens very early and has resulted in much larger harvest which affects the allocation to a greater extent and is an unintended consequence.

Ekuk beach harvesters rely on our small shore-based Alaskan processor located at the historic Ekuk facility, that has been in operation for over 100 years, to purchase their sockeye salmon and provide a high-quality product. This is the last independent, and locally owned and supported, processing facility in Bristol Bay.

Without a plan to achieve the long-standing allocation between setnet and drift gillnet harvesters, the viability of our processing operation is being put at risk. This would be a devastating loss to the Bristol Bay community. Without a market, the many harvesters, their families and crew would not be able to prosecute this traditional fishery.

We are asking the Board of Fisheries to help us by providing direction to the department on ways to manage the allocation and keep the setnet fleet and our processing operation sustainable.

Thank you for your consideration.



Gerald Ball
President and Owner

Submitted by: Travis Allsup

Community of Residence: Togiak river lodge

I support proposal 102, as a sport fisherman and guide on the Togiak we have little to no impact on king salmon using bait a week earlier but would allow us to target sockeye in different ways earlier in the season that doesn't require flossing depending on water levels. With many different user groups on the river, moving the chinook deadline up to the mouth of the pongo would allow everybody to spread out more and give better opportunities for all.

Tav Ammu, Dillingham, Owner/operator of F/V Sea La Vie

44 Limit the number of king salmon retained as homepack in the commercial fishery and in the subsistence fishery, and report all king salmon harvested

- **Oppose** - This is an attempt by an outside sport fishing business to increase their ability to make money at the expense of subsistence fishermen from the area.

48 Modify the fishing period ratio between the set gillnet and drift gillnet gear groups, and change the distance in which gear associated with set gillnet fishing must be removed in the Kvichak River Special Harvest Area

- **Oppose** - Unrealistic efforts to get setnet equipment out of the way so he can catch more. Confusing wording and conflating separate issues.

51 Allow extra drift gillnet to be carried on board the vessel in the Kvichak River Special Harvest Area,

- **Oppose** - Increase opportunities for illegal fishing by “solving” a problem that doesn’t exist.

54 Repeal the Nushagak River Coho Salmon Management Plan

- **Support** - Seems like a similar proposal as 55 with more words

55 Repeal the Nushagak River Coho Salmon Management Plan

- **Support** - Seems like a similar proposal as 54 with less words

56 Remove the sunset date and permanently adopt current defined offshore locations in the Nushagak District set gillnet fishery

- **Support** -

57 Adopt offshore locations used in the Nushagak District set gillnet fishery for the drift gillnet fishery, and prohibit drift gillnet gear from coming into contact with set gillnet gear

- **Support**

59 Ensure drift gillnet fishing opportunity in the Wood River Special Harvest Area, regardless of allocation

- **Oppose** - Proposal is not based on equity but on wanting to catch more for self.

60 Increase the length of a set gillnet in the Wood River Special Harvest Area

- **Oppose** - Proposal is not based on equity but on wanting to catch more for those in the prime locations (first few spots) and decrease potential sharing of resources

61 Repeal provisions allowing commercial fishing, adopt date specific provisions for opening commercial fisheries based on king salmon inriver projected run size, and prohibit the retention of king salmon in the sport fishery

- **Oppose** - We have only one cycle of the King Salmon Management plan, which is less than one generation of a chinook salmon. More time is needed to understand if it is having an impact or not.

62 Prohibit commercial fishing in the Nushagak District until June 28 or until the minimum escapement goal of 55,000 king salmon are counted at the Portage Creek sonar

- **Oppose** - Proposal is meant to increase king salmon fishing opportunity for sport fishing lodges to take money and resources away from local fishers. Same attempt as his first proposal, 42.

63 Amend the Nushagak District King Salmon Stock of Concern Management Plan

Support - This does not change the King Salmon Stock of Concern Management Plan besides putting more restrictions and regulations on sport fishers (90% nonresident) to share the burden of revitalizing the King Salmon population

64 Open the Wood River Special Harvest Area to drift and set gillnet gear until one of the king salmon stock of concern triggers is met

- **Oppose** - We have only one cycle of the King Salmon Management plan, which is less than one generation of a chinook salmon. More time is needed to understand if it is having an impact or not.

69 Adopt recovery goal for Nushagak River King Salmon as recommended in the Department's Status and Action Plan report

- **Oppose** - We have only one cycle of the King Salmon Management plan, which is less than one generation of a chinook salmon. More time is needed to understand if it is having an impact or not.

- 70 Extend the northern boundary in the Ugashik District
- **Support**
-
- 75 Allow permit stacking in the Bristol Bay commercial salmon drift gillnet fishery
- **Oppose** - Bristol Bay has seen substantial permit migration, economic migration, and crewmember migration. Permit stacking will exacerbate the problem, increase the cost of entry, consolidate resources to those who already have a substantial amount, and discourage future local participation in the fishery. It's an excuse for the rich to get richer and hoard resources. If anything the board should vote in the other direction and only allow a boat to run as a "D" boat for two consecutive seasons before requiring that "D" permit to fish on another boat. This would encourage broader knowledge and training, decreased wealth consolidation, and potentially increase opportunities for those interested in getting into the industry to do so.
-
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and hoard resources. If anything the board should vote in the other direction and only allow a boat to run as a “D” boat for two consecutive seasons before requiring that “D” permit to fish on another boat. This would encourage broader knowledge and training, decreased wealth consolidation, and potentially increase opportunities for those interested in getting into the industry to do so.

80 Allow joint venture set gillnet fishing operations in Bristol Bay

- **Support with amendments** - I like this idea but I think there is opportunity for abuse. We must re-write this proposal so that abuse and misuse is not possible.

81 Allow the use of stationary, non-entanglement nets to harvest salmon in the Bristol Bay Management Area

- **Oppose** -

82 Amend multiple vessel specifications and adopt additional vessel specifications

- **Support**

83 Extend the overall length of a vessel registered for salmon net fishing in Bristol Bay, and modify multiple vessel specifications

- **Oppose**

84 Increase the overall length of vessels registered for salmon net fishing in Bristol Bay

- **Oppose**

85 Remove vessel length and include in a separate regulation

- **Support**

87 Define refrigerated seawater transom cooler and include in vessel specification and operations

- **Oppose**

- 88 Remove anchor roller specifications
 - **Oppose**
- 89 Increase the allowable size of an anchor roller
 - **Oppose**

<u>Support</u>	<u>Oppose</u>
54	44
55	48
56	51
57	59
63	60
70	61
80 - Support with amendments	62
82	64
85	69
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Comments of Bristol Bay Proposals

January 2026

Stosh Anderson, Kodiak Alaska

I have fished in Bristol Bay for 50 seasons.

Proposal 53: I do not support this proposal; this will only further disadvantage fishermen in the district by making it more crowded and put the drift fleet closer to the setnet fishermen. This will not accomplish the stated objective to reduce out of district fishing.

Proposal 56: The regulation had a sunset date when adopted; the sunset was put in place so the gillnet boundary could be evaluated as reflecting historical positioning. From my observation it appears to conform to historical positioning. I support removing the sunset provision.

Proposal 71: I support a general district after the 17th of July (end of EO period). Without enforcement presence a subset of the fleet fishing out of the district has been documented. The balance of the fleet that chooses to fish in district is significantly disadvantaged. This is the short-term effect but, in my opinion, not the most important long-term result. The crewman on both the in and out of district participating vessels see and normalize this behavior. What the system is fostering by example is future skippers fishing over the line through out the season. A general district is no panacea but a step in the right direction to providing an orderly fishery. As a note: Protection can't allocate its limited resources to the fishery after escapement have been reached. It is the State's primary responsibility to the sustainability of the resource.

Proposal 75-78: I support stacking of drift permits. In an attempt to achieve an optimum number and subsequent fleet reduction, stacking is more equitable than a buyback program. In a buyback program all permit holders are assessed to fund the buyback. With a stacking scenario permit holders can choose to fund the reduction or not.

Proposal 80: I support setnet fishermen be able to comingle their fish for delivery. This makes sense on the beach or in skiffs. ADF&G can calculate the CPUE so there is limited management impact.

Proposal 85: I support this proposal. The vessels have evolved in the fishery both in propulsion and refrigeration. This proposal addressed the issue without increasing floatation and planning surface within the 32 ft limit. By defining an area aft of transom for various items to be placed, rather than trying to define all the possible apparatus, allows for innovation and ease of enforcement. As stated in Proposal 90; requests 30 inches for stern rollers aft of transom that are currently legal needs to be considered. Any change in the regulation should not make any currently legal portion of the vessel illegal with regulation change.

Submitted by: John Arnestad

F/V T &T

Community of Residence: Washington

My name is John Arnestad and I've been a Bristol Bay Fisherman in Alaska for 40 years. These proposals would substantially restructure the Management Plan before it has been in place long enough to evaluate over a full Chinook generation. Changing the structure of the plan now would reset the clock, undermine one of the most thorough stakeholder processes the Board of Fisheries has ever directed and reduce management flexibility.

Submitted by: Lucas Arnestad

Salvaje Fisheries, LLC

Community of Residence: Washington

Opposing proposals 44, 61-68 Please leave the plan unchanged. These proposals would substantially restructure the Management Plan before it has been in place long enough to evaluate over a full Chinook generation. Changing the structure of the plan now would reset the clock, undermine one of the most thorough stakeholder processes the Board of Fisheries has ever directed and reduce management flexibility.

Submitted by: Alfred Attwood

Community of Residence: Olympia, Washington

I support the proposal 102. I believe that being able to use bait to target sockeye July 11 th instead of the 16th would let you use bait a few more days to catch sockeye. I agree moving the boundaries Geciak River to the Pongo river for Kings it makes sense.

Madam Chair and Members of the Board,

My name is Christina Ball. I am permit holder and owner of a multi generational family set net operation on Ekuk Beach in the Nushigak District. I have been fishing Ekuk Beach off and on since 1997 and have raised my children to fish so the legacy may continue. I submit this comment as an individual whose family's livelihood depends on a safe, fair, and sustainable Bristol Bay fishery. I believe that the proposals that my family and fellow Ekuk Beach fishers have written and support as a collective will add great value to helping keep Bristol Bay sustainable into the future and for generations to come.

Support for Proposal 56:

I support Proposal 56 which would make Ekuk's coordinate based offshore set net boundary permanent. Adopted by the Board in 2022, this boundary has been working successfully as a clear, predictable and enforceable seaward limit. Making this boundary permanent provides certainty for set net placement, safe drift operations, and an enforcement effort in a high density fishing environment. I believe this Proposal will help greatly on both sides of this line both in safety for all fishermen involved and protection for both set net and drift gill net gear.

Support for Proposal 57:

I support Proposal 57, which establishes the same boundary as the shoreward limit for drift gill net gear and prohibits contact with set gill net gear. This proposal reduces entanglement risk which leads to gear loss and unsafe nearshore interactions by clearly defining spatial limits and updating set net gear definitions. As the drift fleet has grown significantly in size and horsepower in the Nushigak District these clear and enforceable rules are essential to maintaining an orderly and safe fishery. My family and I as well as countless other set netters on Ekuk Beach have been affected greatly by drift boats and their gear interfering with our set net gear over the years that have caused countless economic losses and in some cases led to some set netters losing nearly the entire fishing season based on tidal constraints to reset our set net gear.

Support for Proposal 65:

I support Proposal 65, which will help reestablish the Board adopted 26% set net allocation that has not been met by ADF&G for many years leading a disproportionate economic burden on Ekuk Beach fishers. My family and I as well as our entire set net fleet and our shoreside processor have been severely negatively affected by the failure to achieve even close to our allocation by more recent failed efforts by ADF&G. I believe this proposal will aid greatly in helping Ekuk Beach and other Nushigak set netters as well as watershed communities in the Nushigak getting back to where we once were and treated in a fair economic manner.

Support for Proposal 80:

I support Proposal 80, which allows limited joint venture set net operations under defined conditions. Joint ventures help small family based operations adapt to short openings, rising costs and safety challenges without increasing fishing footprint or promoting consolidation. This approach has worked successfully for decades in the Kodiak set net fisheries for over 40 years.

These requests I believe are crucial to sustaining the legacy fishing operations on Ekuk Beach. For over 100 years Ekuk has harvested some of the best salmon in the Bay and it is up to us to ensure that future generations continue to have the same opportunities we have had.

I appreciate your consideration and your time in these matters.

Sincere Regards,
Christina Ball

Madam Chair and Members of the Board,

My name is Gavin Ball. I am permit holder and part of a multi generational family set net operation on Ekuk Beach in the Nushigak District. I have been fishing Ekuk Beach for nearly a decade as a fourth generation set netter. I submit this comment as an individual whose family's livelihood depends on a safe, fair, and sustainable Bristol Bay fishery. I believe that the proposals that my family and fellow Ekuk Beach fishers have written and support as a collective will add great value to helping keep Bristol Bay sustainable into the future and for generations to come.

Support for Proposal 56:

I support Proposal 56 which would make Ekuk's coordinate based offshore set net boundary permanent. Adopted by the Board in 2022, this boundary has been working successfully as a clear, predictable and enforceable seaward limit. Making this boundary permanent provides certainty for set net placement, safe drift operations, and an enforcement effort in a high density fishing environment. I believe this Proposal will help greatly on both sides of this line both in safety for all fishermen involved and protection for both set net and drift gill net gear.

Support for Proposal 57:

I support Proposal 57, which establishes the same boundary as the shoreward limit for drift gill net gear and prohibits contact with set gill net gear. This proposal reduces entanglement risk which leads to gear loss and unsafe nearshore interactions by clearly defining spatial limits and updating set net gear definitions. As the drift fleet has grown significantly in size and horsepower in the Nushigak District these clear and enforceable rules are essential to maintaining an orderly and safe fishery. My family and I as well as countless other set netters on Ekuk Beach have been affected greatly by drift boats and their gear interfering with our set net gear over the years that have caused countless economic losses and in some cases led to some set netters losing nearly the entire fishing season based on tidal constraints to reset our set net gear.

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I support Proposal 65, which will help reestablish the Board adopted 26% set net allocation that has not been met by ADF&G for many years leading a disproportionate economic burden on Ekuk Beach fishers. My family and I as well as our entire set net fleet and our shoreside processor have been severely negatively affected by the failure to achieve even close to our allocation by more recent failed efforts by ADF&G. I believe this proposal will aid greatly in helping Ekuk Beach and other Nushigak set netters as well as watershed communities in the Nushigak getting back to where we once were and treated in a fair economic manner.

Support for Proposal 80:

I support Proposal 80, which allows limited joint venture set net operations under defined conditions. Joint ventures help small family based operations adapt to short openings, rising costs and safety challenges without increasing fishing footprint or promoting consolidation. This approach has worked successfully for decades in the Kodiak set net fisheries for over 40 years.

These requests I believe are crucial to sustaining the legacy fishing operations on Ekuk Beach. I have been raised to continue in the heritage my father and forefathers started and believe that Ekuk and that future needs protection moving forward. I appreciate your time and effort as you carefully consider these proposals.

Sincere Regards,
Gavin Ball

EBFA Member Public Comment Template

Alaska Board of Fisheries – Bristol Bay Finfish Meeting

Madam Chair and Members of the Board,

My name is Hilde Ball, and I am a set-net crew member in my family's fishing operation, where we fish on Ekuk Beach in the Nushagak District. I submit this comment as a member of the Ekuk Beach Fishermen's Association (EBFA), and as someone whose livelihood and family depend on a safe, fair, and sustainable Bristol Bay fishery. I have spent my entire life fishing in Ekuk and living in the communities of Bristol Bay, where my family has lived for six generations. I support the following proposals, outlined below, that EBFA has also written in support of. This is because I have seen first-hand how detrimental poor Chinook management, lack of an official and enforced offshore set-net boundary, and allocation can be to set-net fishing communities like my own. Therefore, I believe that these proposals will benefit not only set-net fishermen like myself, but also the Bristol Bay fishery as a whole.

Allow the Nushagak Chinook Management Plan to Complete a Full Life Cycle

I support allowing the Nushagak Chinook Management Plan to work without preemptive alterations. Chinook are long-lived fish with a life cycle of seven years, and meaningful evaluation of conservation outcomes requires time and consistency. This plan was developed through a multi-year, Board-convened stakeholder process and adopted unanimously in 2023. Re-setting management in the middle of the Chinook life cycle creates instability for fishing families and undermines the ability to evaluate whether the plan is working.

Support for Proposal 56: Predictable Spatial Boundaries

I support Proposal 56, which would make Ekuk's coordinate-based offshore set-net boundary permanent. Adopted by the Board in 2022, this boundary has been working successfully as a clear, predictable, and enforceable seaward limit. Making it permanent provides certainty for set-net placement, drift operations, and enforcement in a high-density fishing area.

Support for Proposal 57: Orderly and Safe Fishing

I support Proposal 57, which establishes the same boundary as a shoreward limit for drift gear and prohibits contact with set-net gear. This proposal reduces entanglement risk, gear loss, and unsafe nearshore interactions by clearly defining spatial limits and updating set-net gear definitions. As the drift fleet has grown significantly in size and horsepower, these clear, enforceable rules are essential to maintaining an orderly and safe fishery.

Support for Proposal 80: Joint-Venture Set-Net Operations

I support Proposal 80, which allows limited joint-venture set-net operations under defined conditions. Joint ventures help small, family-based sites adapt to short openings, rising costs, and safety challenges without increasing fishing footprint or promoting consolidation. This approach has worked successfully in Kodiak set-net fisheries for over four decades.

Economic and Community Impacts of Missed Allocation

In recent years, set-net fishermen in the Nushagak District have consistently fallen far short of the Board-adopted 26% set-net allocation. These shortfalls, in harvest share and time, have real consequences for fishing families, local processing, and watershed communities like Ekuk. When allocation exists on paper but is not achieved in practice year after year, the economic and social fabric of Bristol Bay communities is weakened.

Together, these requests are important steps toward equitable harvest share in practice, not just on paper. Allowing the Chinook Management Plan to complete at least a full life cycle before considering alterations to the plan encourages participation and trust in conservation management; Proposals 56 and 57 reduce conflict and safety risks that disproportionately impact onshore set-net fishermen; and Proposal 80 provides limited flexibility for small operations to adapt to shortened and more complex fishing opportunities. These measures help ensure that set-net fishermen in the Nushagak District have a fairer opportunity to sustain our fishing families and watershed communities over the long term.

Thank you for your consideration and for your service to Alaska's fisheries and fishing communities.

Respectfully submitted,
Hilde Ball
Ekuk Beach, Nushagak District

Madam Chair and Members of the Board,

My name is Jason Ball. I am an owner operator of a multi generational family set net operation on Ekuk Beach in the Nushigak District. I have been fishing Ekuk Beach for decades as my father and his father did before him. I submit this comment as an individual whose family's livelihood depends on a safe, fair, and sustainable Bristol Bay fishery. I believe that the proposals that my family and fellow Ekuk Beach fishers have written and support as a collective will add great value to helping keep Bristol Bay sustainable into the future and for generations to come.

Support for Proposal 56:

I support Proposal 56 which would make Ekuk's coordinate based offshore set net boundary permanent. Adopted by the Board in 2022, this boundary has been working successfully as a clear, predictable and enforceable seaward limit. Making this boundary permanent provides certainty for set net placement, safe drift operations, and an enforcement effort in a high density fishing environment. I believe this Proposal will help greatly on both sides of this line both in safety for all fishermen involved and protection for both set net and drift gill net gear.

Support for Proposal 57:

I support Proposal 57, which establishes the same boundary as the shoreward limit for drift gill net gear and prohibits contact with set gill net gear. This proposal reduces entanglement risk which leads to gear loss and unsafe nearshore interactions by clearly defining spatial limits and updating set net gear definitions. As the drift fleet has grown significantly in size and horsepower in the Nushigak District these clear and enforceable rules are essential to maintaining an orderly and safe fishery. My family and I as well as countless other set netters on Ekuk Beach have been affected greatly by drift boats and their gear interfering with our set net gear over the years that have caused countless economic losses and in some cases led to some set netters losing nearly the entire fishing season based on tidal constraints to reset our set net gear.

Support for Proposal 65:

I support Proposal 65, which will help reestablish the Board adopted 26% set net allocation that has not been met by ADF&G for many years leading a disproportionate economic burden on Ekuk Beach fishers. My family and I as well as our entire set net fleet and our shoreside processor have been severely negatively affected by the failure to achieve even close to our allocation by more recent failed efforts by ADF&G. I believe this proposal will aid greatly in helping Ekuk Beach and other Nushigak set netters as well as watershed communities in the Nushigak getting back to where we once were and treated in a fair economic manner.

Support for Proposal 80:

I support Proposal 80, which allows limited joint venture set net operations under defined conditions. Joint ventures help small family based operations adapt to short openings, rising costs and safety challenges without increasing fishing footprint or promoting consolidation. This approach has worked successfully for decades in the Kodiak set net fisheries for over 40 years.

These requests are important steps to towards fair and equitable harvest share as well as common sense approaches to more effective and safe management for the Nushigak District. I appreciate your consideration and your time in these matters as well as the Board's dedication to our Great state and its fisheries.

Sincere Regards,
Jason Ball

Alaska Board of Fisheries – Bristol Bay Finfish Meeting

Madam Chair and Members of the Board,

My name is Logan Ball, and I am a set net permit holder fishing on Ekuk Beach in the Nushagak District. I submit this comment as a member of the Ekuk Beach Fishermen's Association (EBFA) and as someone whose livelihood and family depend on a safe, fair, and sustainable Bristol Bay fishery.

Allow the Nushagak Chinook Management Plan to Complete a Full Life Cycle

I support allowing the Nushagak Chinook Management Plan to work without preemptive alterations. We have not given the plan time to see if it effective and disrupting it now would skew any data we would gather on its effectiveness. I believe we should at the very least let the plan go through a whole chinook life cycle of 7 years before any decisions are made regarding the plan and changes that might be made to it. This plan was developed through a multi-year, Board-convened stakeholder process and adopted unanimously in 2023. Re-setting management in the middle of the Chinook life cycle creates instability for fishing families and undermines the ability to evaluate whether the plan is working.

Support for Proposal 56: Predictable Spatial Boundaries

I support Proposal 56, which would make Ekuk's coordinate-based offshore set-net boundary permanent. Adopted by the Board in 2022, this boundary has been working successfully as a clear, predictable, and enforceable seaward limit. Making it permanent provides certainty for set-net placement, drift operations, and enforcement in a high-density fishing area.

Support for Proposal 57: Orderly and Safe Fishing

I support Proposal 57, which establishes the same boundary as a shoreward limit for drift gear and prohibits contact with set-net gear. This proposal reduces entanglement risk, gear loss, and unsafe nearshore interactions by clearly defining spatial limits and updating set-net gear definitions. As the drift fleet has grown significantly in size and horsepower, these clear, enforceable rules are essential to maintaining an orderly and safe fishery. In the past my family has had many instances where boats have cut our lines and we will loose out on several tides, if not several days or weeks, of fishing time and there is little enforcement on this. Even when we have taken pictures and videos of this happening, those boats rarely get tickets, and there is no compensation for us and our lost fishing time. We are not able to reset our gear unless the tide is low enough for us to reach our screw anchors out in the water. So sometimes that means we are down for a tide and other times that means we are down for days or weeks. I believe that this proposal would help to put protections in place for set net sites and help law enforcement to be able to enforce those protections.

Support for Proposal 80: Joint-Venture Set-Net Operations

I support Proposal 80, which allows limited joint-venture set-net operations under defined conditions. Joint ventures help small, family-based sites adapt to short openings, rising costs, and safety challenges without increasing fishing footprint or promoting consolidation. This approach has worked successfully in Kodiak set-net fisheries for over four decades.

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In recent years, set-net fishermen in the Nushagak District have consistently fallen far short of the Board-adopted 26% set-net allocation. These shortfalls, in harvest share and time, have real consequences for fishing families, local processing, and watershed communities

like Ekuk. When allocation exists on paper but is not achieved in practice year after year, the economic and social fabric of Bristol Bay communities is weakened.

Together, these requests are important steps toward equitable harvest share in practice, not just on paper. Allowing the Chinook Management Plan to complete at least a full life cycle before considering alterations to the plan encourages participation and trust in conservation management; Proposals 56 and 57 reduce conflict and safety risks that disproportionately impact onshore set-net fishermen; and Proposal 80 provides limited flexibility for small operations to adapt to shortened and more complex fishing opportunities. These measures help ensure that set-net fishermen in the Nushagak District have a fairer opportunity to sustain our fishing families and watershed communities over the long term.

Thank you for your consideration and for your service to Alaska's fisheries and fishing communities.

Respectfully submitted,

Logan Ball

Ekuk Beach, Nushagak District

PC17

Submitted by: Samantha Barnes

Community of Residence: Naknek

Having family who make their living from fishing in Bristol Bay, I strongly disagree with proposal 61 as it has major negative impact on my family and all other Bristol Bay fisherman who rely on this fishery to make a living for themselves and their families. I believe our biologists have the ability to manage this fishery properly as they have for years. This proposal takes it out of the biologists hands completely, and will cause severe negative impact to the future of the sockeye salmon run in the Nushigak district.

PC18

Submitted by: Boris Basargin

Community of Residence: Homer

I'm opposing the Nushagak king salmon plan. Proposal 61 and a few more. Of those Proposals are adopted. We're losing our whole livelihood. And I believe of what i experienced in Bristol Bay since early 90's. It is not the Commercial gillnetters that are the Cause of the Kingsalmon population.

So please Consider Reevaluating these. And hopefully go back to the management plans we had before.

We used to start Nushagak fishing once 100k sockeye passed now , 3mil.

PC19

Submitted by: Daniel Basargin

Community of Residence: Homer

I oppose proposals 41 and 61-68. I ask the board to leave the management plan unchanged. INTERCEPTED Chinook numbers must be studied in the Bering Sea as it is not only Nushagak Chinook struggling.

PC20

Submitted by: Ivan F Basargin

Community of Residence: Homer, Alaska

The proposals 44, 61 through 68 needs to be left unchanged, the current management plan has not been in place long enough to evaluate the chinook salmon plan, Changing the structure of the plan now would reset the clock, undermine one of the most thorough stakeholder processes the Board of Fisheries has ever directed and reduce management flexibility.



December 26, 2025

Subject: Opposition to Proposal #52

To the Alaska Board of Fisheries,

Becharof Corporation respectfully submits these comments in opposition to Proposal #52, which seeks to establish an “Upper Egegik River Sockeye Salmon Special Harvest Area.” Becharof Corporation is the private landowner of a substantial portion of the river corridor and adjacent lands located entirely within the proposed harvest area, and therefore has a direct and significant interest in the impacts of this proposal.

Our opposition is based on the following concerns:

- **Trespass Issues:** Establishing a commercial harvest area over privately owned lands would significantly increase trespass incidents by both set and drift gillnet fishermen. Managing and responding to trespass complaints would place an undue burden on the landowner and enforcement agencies.
- **Shoreline Erosion:** The proposed area includes sections of river that are naturally narrow and environmentally sensitive. Increased fishing pressure, vessel traffic, and shore anchoring associated with set net gear would accelerate shoreline erosion, destabilize riverbanks, and cause long-term habitat degradation.
- **Law Enforcement Challenges:** Alaska State Troopers are already short-staffed, and this remote area would be difficult to patrol effectively. Enforcement would be challenging not only for fisheries regulations, but also for addressing trespass issues on private land.
- **Lack of Tender Accessibility:** The proposed harvest area is not accessible for tenders to safely and efficiently receive fish. This limitation would create logistical inefficiencies and could result in unsafe practices or delayed fish deliveries.
- **Safety Concerns:** This section of the river is shallow, complex, and difficult to navigate, effectively limiting safe operation to jet boats. In the event of an accident or emergency, the area would be difficult to access for search, rescue, or medical response.
- **Precedent and Landowner Impacts:** Approval of this proposal would establish a troubling precedent for expanding commercial fishing effort into remote, privately owned river corridors without adequate consideration of landowner rights, enforcement

feasibility, safety concerns, or conservation risk. Such precedent could encourage similar proposals elsewhere, compounding these issues across other private land holdings.

- **Risk to Discrete Fish Runs:** The Egegik River / Becharof Watershed Navigability Report (1996) identifies **Swampy River**, located entirely within the proposed harvest area, as a navigable channel. Due to its narrow mouth, nets could easily span the full width of this channel even with reduced net length restrictions in place, creating a high risk of intercepting and negatively impacting an entire discrete salmon run. Additionally, the overall narrowing of the Upper Egegik River and its associated channels would concentrate fishing effort in confined corridors, increasing the likelihood of disproportionate interception of upstream-bound discrete stocks. **Under these conditions, the proposal fails to demonstrate that conservation and sustained yield objectives can be reliably met.**

For these reasons, Becharof Corporation believes Proposal #52 presents unacceptable risks to private property rights, fish habitat, public safety, and the long-term sustainability of salmon resources. **The proposal does not demonstrate a clear biological or management need that cannot be addressed through existing commercial harvest areas**, and we respectfully request that the Board of Fisheries reject Proposal #52.

Respectfully submitted,

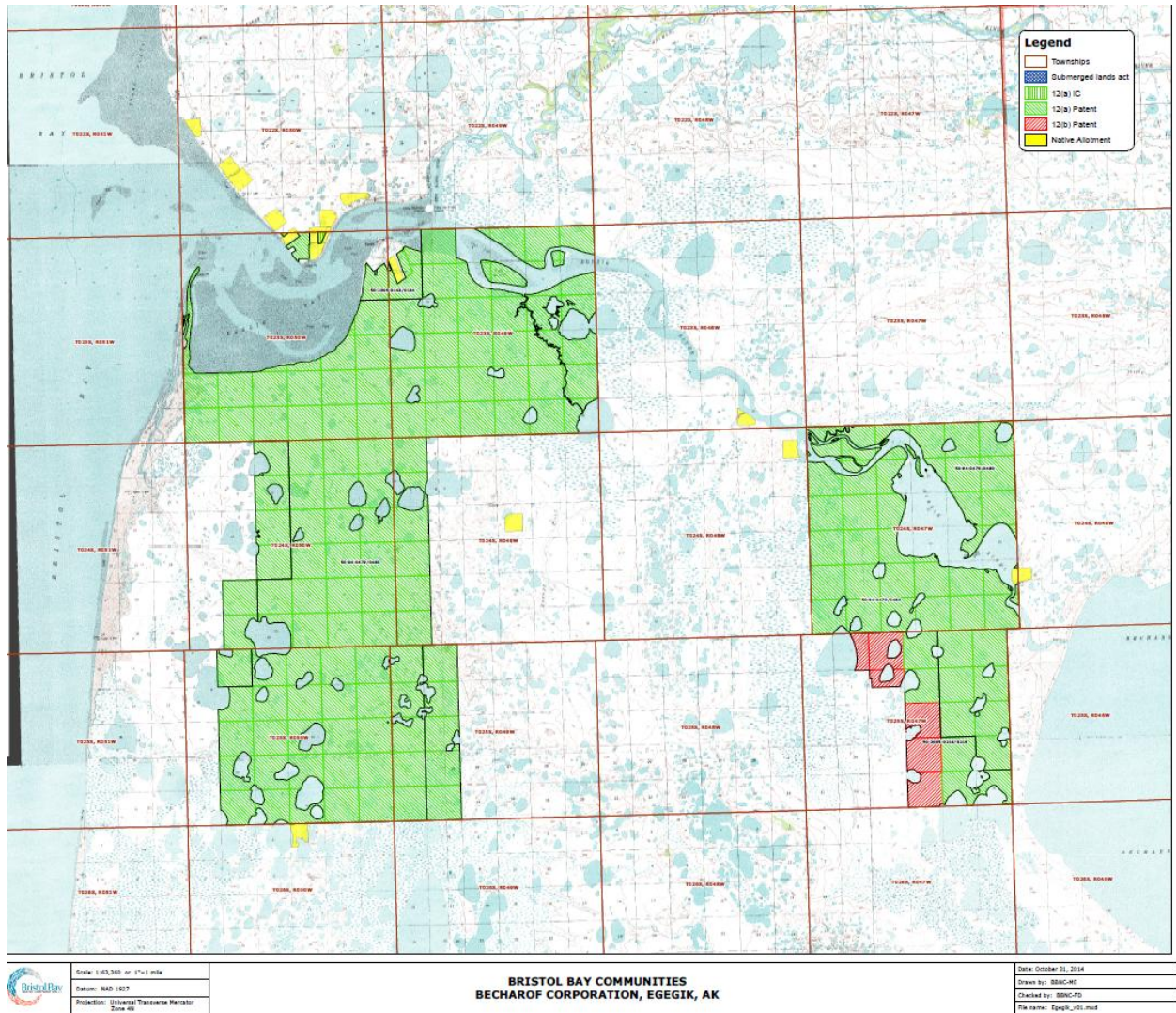
Derek Bennett

Derek Bennett
President
Becharof Corporation
On behalf of the Board of Directors

Private Landowner within the Proposed Upper Egegik River Area

Attached: Exhibit 1 - Becharof Corp land holdings map

Exhibit 1 – Becharof Corporation Land Holdings



Submitted by: Stanley Beebe

Community of Residence: Out of state

Subject: Written Testimony – Board of Fisheries Proposals

Dear Members of the Alaska Board of Fisheries,

My name is Stanley Beebe. I am a Bristol Bay set net fisherman and permit holder submitting written testimony on the referenced proposals.

I oppose Proposals 44 and 61–68 to the extent that they would modify the Nushagak District King Salmon Stock of Concern (SOC) Management Plan.

The SOC plan was developed through a multi-year, stakeholder-driven process involving commercial, subsistence, and sport users, Advisory Committees, and the Alaska Department of Fish and Game. It has been in place for only three seasons and was not expected to produce immediate biological recovery given the 4–7 year Chinook life cycle.

Available analyses indicate the plan is functioning as intended by delaying openings, reducing fishing time during peak Chinook vulnerability, lowering commercial exploitation, and increasing escapement.

I respectfully request the Board allow the plan to remain unchanged and be evaluated over a full Chinook generation.

Sincerely,

Stanley Beebe

Submitted by: Jaymi Bethea

Community of Residence: Out of State

I am against management plan updates to the Nushagak district, that are based on rigid date based methods. I am against the proposals #61,62, and 69. To restrict the commercial fishery openers based on king escapement any further risks damaging the ecosystem and return of all salmon if there is a large over escapement during the time commercial fishing is closed in the Nushagak early season. This would defeat the intention of these proposals and would damage every fishing outfitter sport and commercial.

I support stacking permits, and being able to fish a dual permit with a sole permits holder.

Submitted by: George Bishop

Community of Residence: Homer, Alaska

I have fished consistently in Bristol Bay as a set netter since 1980 along with my family. Proposal #80 would keep all of my family members in legal status while selling multiple family member caught fish.

December 29, 2025

To Whom It May Concern:

My name is Toby Bloom and I have been a fisherman in Bristol Bay since my first season crewing in 2008. In 2023 I purchased a drift boat and a permit and have enjoyed running my own operation for the past few years. Although I have spent time fishing in all five districts, the Nushagak district is often an important part of each season. The longevity and sustainability of the Bristol Bay fishery have always been important to me, but both have become even more of a priority as I've invested in the fishery.

After reviewing the Board of Fish proposals for 2026, I'm concerned that several proposals – particularly those related to the 2023 Nushagak King Salmon Stock of Concern Management Plan (Proposals 44 and 61-69) – may be premature and potentially distracting from ongoing conservation efforts. I understand that the 2023 Plan represents a well-informed, data-driven, and collaborative approach to king conservation in the Nushagak district with support from commercial, sport, and subsistence fishermen, as well as regulatory and research bodies.

The first few years under this plan have shown promising signs, with increased escapement numbers during peak king runs and broad acceptance of reduced fishing time in the name of conservation. However, we still have not observed a full life cycle for the generation of kings hatched in 2023. Given the four- to seven-year lifespan of a king salmon, more time is needed before meaningful conclusions can be drawn about the current plan's effectiveness. If the current plan was in critical need of revision, then I could see a need for intervention at this point. But given the promising signs so far, it seems prudent to limit modifications and stay the course such that the 2023 plan can be thoroughly assessed once enough time has passed.

I ask that the Board allow the 2023 Management Plan to play out over a full generation of king salmon, unmodified, such that it can be properly evaluated after an appropriate period of time has passed.

Toby Bloom



Submitted by: Joseph Boenish
boenish fisheries llc
Community of Residence: Naknek
44, 61-68

Corey Boone
[REDACTED]
Missoula, MT 59808
[REDACTED]
F/V Emmie Lu

Alaska Board of Fisheries,

I am writing in support of permit stacking, proposals 75 and 76. Please read, as permit stacking will have a positive benefit to king salmon survival, as well as other items of concern.

My name is Corey Boone (43), I am a commercial fisherman in Bristol Bay. I own my own vessel (14 years), direct market my catch, and advocate for our fishery. I am currently a non-resident of Alaska, and I reside in Missoula, MT. However, I spent the first 22 years of my life living in Homer, AK while assisting my father for some of his 25 years in the Bristol Bay fishery.

My goal in writing to you is to present information supporting the ability of individuals to stack their fishing permits, ie. one individual can fish two permits at the same time from one vessel, D vessel.

The Bristol Bay fishery is composed of many different individuals from many different backgrounds and geographical areas that converge each year to harvest sockeye from the five main districts of Bristol Bay. Each individual has their own story that has landed them in a position to own their limited entry permit for the Bristol Bay fishery.

This limited entry permit gives each person equal opportunity to harvest salmon from the waters of Bristol Bay. The fishery offers a level platform for individuals to pursue their goals. It is up to each individual permit holder to determine the scope of their involvement in the fishery, and to determine the level of productivity they strive to achieve.

The two main goals of fisherwomen and fishermen involved in the Bristol Bay fishery are the sustainability of the fishery and profitability from the harvest.

The sustainability of the fishery falls into the hands of the professionals in Alaska's Department of Fish and Game. They are competent at what they do and we defer to them to manage the fishery to their best capabilities while assisting in any way possible.

The focus of sustainability is currently surrounding king salmon numbers. Permit stacking will reduce gear in the water and help increase survival and escapement for king salmon.

The profitability for each individual permit holder is tied to their fishing style, decision making, equipment maintenance, crew management, hiring practices, gear management, etc.

The option for permit holders to fish two permits at the same time directly correlates to every permit holder's increased profitability in the fishery and allows for increased king salmon survival and escapement. Details below.

1 permit = 150 fathoms of fishable gillnet gear

2 permits registered to separate vessels = 300 fathoms of gillnet being fished

2 permits registered to the same vessel = 200 fathoms of gillnet being fished (D vessel)

*Each registered D vessel removes 100 fathoms of gillnet gear from the Bristol Bay fishing waters. 100 fathoms = 600 feet, 10 new D boats equates to over 1 mile of gillnet gear removed from the fishery, 100 new D boats equates to over 10 miles of gillnet gear removed from the fishery.

The benefits of increased D vessels fishing in Bristol Bay are as follows:

- I. Potential for larger volumes of king salmon escapement due to reduced fishing gear in the water.
 - A. King salmon conservation is top of mind for all involved in the Bristol Bay fishery. Permit stacking will reduce gear in the water and allow for increased king salmon survival and escapement.
- II. Increased profitability for all vessels.
 - A. Less gear in the water equates to larger possible catch volumes per fishing vessel.
 - B. Lowers the risk of failed financial seasons on low volume years.
- III. Less aggressive fishing practices on boundary lines.
 - A. Decreased vessel traffic on fishing lines leads to reduced on-water conflicts, vessel collisions, enforcement strain, and fishery stress.
- IV. Fewer conflicts between set-netters and gillnetters.
 - A. In-river and shallow water vessel numbers would be decreased resulting in fewer instances of gear entanglement and could lead to an improved relationship between the two gear groups.

The ability of permit holders for the Bristol Bay fishery to fish two permits at once, D vessel, will benefit the entire fleet and the future of Bristol Bay salmon.

Thank you for your time and consideration.

Sincerely,

Corey Boone

Submitted by: Dylan Borden-Deal

Community of Residence: Seattle Washington

My name is Dylan Borden-Deal and I am a Bristol Bay drift net permit holder, and boat owner with 18 years of fishing experience in Bristol bay.

I would like to voice my strong OPPOSITION to proposal 44 as well as proposals 61-69.

The Nushagak King Salmon Management Plan, adopted in 2023, hasn't been in place long enough to assess a full age-class of King salmon. Therefore the management plan should not be altered at this time.

Submitted by: Rowan Borden-Deal

Community of Residence: Cordova AK

Hello I'm Rowan Borden-Deal owner operator f/v Luna Mar and Bristol Bay Drift permit holder. I have fished Bristol Bay and specifically the nushigak every season since 2003. When I arrived there was still a commercial fishery for king salmon. I have watched over 20 years as these stocks dwindled. I am strongly in favor of a management strategy that helps preserve king salmon. These proposals undermine years of experience and a comprehensive management plan that is already in place. To change the plan now before even one full king salmon life cycle has taken place would be negligent and short sighted. We need management that's has a steady hand not reactionary and sporadic strategy. I adamantly oppose proposal 44, and 61-68.

Submitted by: Chris Braun

Sustainable fisherman

Community of Residence: Kenai

I oppose Proposal 44 restrictions on the Bristol Bay directed sockeye salmon fishery.

Delaying or limiting sockeye management until after June 28 would waste management efforts and Alaska resources, doing little to protect future runs.

The primary threat remains Bering Sea trawlers—the only fishery without meaningful Chinook (king) salmon bycatch restrictions. These unsustainable vessels intercept significant numbers of Bristol Bay-bound kings year-round as prohibited species catch.

Restricting sustainable in-river drift and set net fisheries before controlling federal ocean trawl bycatch is ineffective. True conservation must prioritize the largest impacts first.

Bristol Bay Fishermen's Association

P.O. Box 60131

Seattle, WA 98160

Phone (206) 542-3930

bbfa@seanet.com

www.bristolbayfishermen.org



Date: December 29, 2025

ATTN: BOF COMMENTS

Alaska Department of Fish and Game

Boards Support Section

The **Bristol Bay Fishermen's Association** (BBFA) submits the following positions and comments on proposals for the Bristol Bay Finfish Board of Fisheries Meeting.

BBFA represents permit holders who fish for salmon in Bristol Bay. Our mission is to protect the renewable salmon resource and promote economic sustainability for commercial salmon permit holders in Bristol Bay.

Thank you for the opportunity to provide comments on these proposals.

Sincerely,

A handwritten signature in black ink, appearing to read "Luke Peterson", written over a light blue horizontal line.

Luke Peterson

President

BBFA's Bristol Bay Board of Fisheries Proposals Positions/Comments

Subsistence

Proposal 44: Oppose (see BBFA comments on Proposals 61-69.)

Eastside Management

Proposals 45-47: Oppose

Proposals 48-51: Oppose: Do not make changes to the Kvichak River Sockeye Salmon Special Harvest Area Management Plan. There is no basis to change management of a plan for a fishery that has not occurred yet.

Proposal 52: Neutral

Proposal 53: Oppose

Westside Management

Proposal 54: Support

Proposal 55: Support

Proposal 56: Neutral

Proposal 57: Oppose

Proposals 58-60: Neutral

Nushagak District King Salmon Stock of Concern Management Plan

Proposals 61-69: Opposed

The Bristol Bay Fishermen's Association asks the Board of Fisheries to leave the Nushagak District King Salmon Stock of Concern Management Plan unchanged. Proposals 44 and 61-69 would substantially restructure the Management Plan before it has been in place long enough to evaluate over a full Chinook generation. Changing the structure of the plan now would reset the clock, undermine one of the most thorough stakeholder processes the Board of Fisheries has ever directed and reduce management flexibility.

If passed, these proposals could lead to a loss of harvest of 7 million sockeye for the commercial fishing fleet in the Nushagak. For example, **Proposal 61 could close the sockeye fishery until June 28th, and becomes a non-seasonal mandate usurping AGF&G's authority.**

Fishing Districts

Proposal 70: Neutral

Proposals 71-74: Neutral

It has come to BBFA's attention that during the late season there have been many complaints about overline fishing activities outside the western boundary of the Egegik District. After reviewing this, we believe that this is an enforcement issue. Apparently, there are not enough enforcement personnel in this district in the late season. Looking forward to the 2026 fishing season we are requesting that the Alaska Troopers extend their time commitment for enforcement in this district and budget for this action, as necessary.

Gear Specifications

Proposal 75: Neutral

Proposal 76: Support (Regarding permit stacking proposals, BBFA supports proposal 76.)

BBFA supports permit stacking in Bristol Bay. Permit stacking would be a next step to further the successes of the dual permit rule. 466 permit holders utilized the dual permit rule during the 2025 season. The result of this is a reduced fleet size which approaches the optimum number cited by CFEC. Also, the corresponding amount of gear removed from the fisheries has resulted in better catches of sockeye salmon for the fleet in general.

Proposal 77: Oppose

Proposal 78: Neutral

Proposal 79: Neutral

Proposal 80: Neutral

Proposal 81: Oppose

Vessel Specifications

Proposals 82-91: Support with Amendments

The current boat length limit regulation is unenforceable and therefore is not a law but merely words on paper, too complicated and open to interpretation. BBFA supports a length limit regulation that is simple, clear and enforceable.

The Alaska Wildlife Troopers (AWT) submitted comments to the Board of Fisheries dated 9/28/23 voicing concern with the current boat length limit and stated that they support a change in the regulation. They commented, **“Alaska Wildlife Troopers (AWT) believes having a maximum overall length with no exceptions is the simplest to interpret and straightforward to enforce.** Having a maximum distance from the most forward extremity to the aft extremity eliminates all confusion on what is allowed.”

The AWT also stated that “Having exceptions allows for different interpretations of the definition of an allowable item, thus creating confusion and arguments.”

There are two options to provide an enforceable boat-length limit law in Bristol Bay:

1. Measure the vessel length overall (LOA), including all extensions, not to exceed 37 feet.
This option would bring the current fleet into compliance.
This option would allow the current fleet, many of which are 12 feet wide class, to be lengthened at a fraction of the cost of new and used vessels.
2. Retain the current 32-foot vessel hull length only and allow all non-flotational extensions.
This option would also bring the current fleet into compliance.

Either of these options would make the length limit law clear, enforceable and would restore the regulation to what it originally was intended.

Fishing Periods, Seasons, and Reporting

Proposal 92: Oppose

Proposal 93: Neutral

Proposal 94: Neutral

Proposal 95: Neutral

Sport Fisheries

Proposals 96-104: Neutral

Proposal 105: Oppose

Formal Response to ADF&G Staff Comments on Proposals 61 and 62: Nushagak District King Salmon Stock of Concern Management Plan

Submitted by:

Jordan Head

Executive Director - Bristol Bay Science and Research Institute (BBSRI)

Executive Summary

This document provides a formal response to a statement contained in the Alaska Department of Fish and Game's staff comments on Proposals 61 and 62 asserting that *"basing commercial fishing opportunity on sockeye salmon abundance rather than king salmon abundance as the primary tool for king salmon rebuilding has been controversial, because rebuilding king salmon becomes secondary to sockeye salmon harvest opportunity once the trigger is met."*

Our intent in submitting this response is not to dispute the Department's broader analysis or conservation objectives, but to ensure the Board has a clear and accurate understanding of how the Nushagak District King Salmon Stock of Concern Management Plan is structured to function in practice.

The plan does not prioritize sockeye harvest opportunity over king salmon rebuilding. Rather, it reflects the Board's direction, developed through a multi-year, Board-chartered committee process, to conserve king salmon effectively while avoiding false precision under known assessment uncertainty. King salmon status and abundance determine when heightened conservation applies; sockeye abundance determines how those conservation actions are scaled so they remain biologically meaningful for king salmon across all sockeye salmon run sizes.

Critically, sockeye-scaled tools under the plan do not end once triggers are met and the commercial fishery begins. **Sockeye salmon Optimal Escapement Goals (OEGs) require continued management action after the fishery opens, including breaks in fishing time, to ensure additional king salmon continue to pass into the river throughout the season.** This design ensures that king salmon conservation does not become secondary once an opening trigger is met but instead remains active and enforceable before *and during* the fishery.

This intent is explicitly documented in Board of Fisheries Finding 2023-303-FB adopted concurrently with the plan, which states that tiered sockeye salmon OEGs are intended to restrict early fishing and require continued management during the latter portion of the king salmon run to ensure adequate protection of king salmon stocks.

In short, this document clarifies that:

- The Stock of Concern designation and king salmon abundance trends are what drive use of the plan,
- Sockeye-scaled triggers and OEGs are used to implement and sustain king salmon conservation across highly variable sockeye run sizes,
- In 2018, the Board determined that prescriptive, king-number-based triggers were not defensible given uncertainty in sonar-based king salmon estimates (RC 84; RC 51), leading directly to the committee process and current plan structure,
- The plan was developed by a thorough committee process, extensive engagement with advisory committees and regional stakeholders, and was adopted unanimously by the Board of Fisheries at the March 2023 statewide meeting, reflecting a high level of consensus, and
- The plan reflects Board intent and committee recommendations.

The sections that follow provide the historical context and regulatory mechanics supporting this clarification.

Introduction

The Bristol Bay Science and Research Institute (BBSRI) has worked closely with the Alaska Department of Fish and Game (ADF&G) for many years to support science-based management of Bristol Bay salmon fisheries. That collaboration has been essential to navigating increasingly complex biological, social, and operational challenges, particularly for Nushagak River king salmon.

In reviewing the Department's staff comments on Proposals 61 and 62, BBSRI agrees with much of the Department's narrative and technical background. Specifically, we agree with the Department's acknowledgment of the uncertainty associated with in-season king salmon abundance estimates, the limitations of sonar-based enumeration, especially during periods of high sockeye passage, and the importance of abundance-based management approaches that allow managers to respond to highly variable run sizes while protecting escapement goals.

We also recognize and appreciate that the Department's comments describe real and unavoidable tradeoffs inherent in managing mixed-stock, mixed-use fisheries in the Nushagak District, including foregone sockeye harvest associated with conservation actions intended to protect king salmon.

However, within this broader, analytical framework, one statement in particular warrants clarification to ensure the Board has an accurate understanding of how the current Stock of Concern Management Plan functions and why it was designed as it is.

Clarifying the Department's Statement in Context

In its comments on Proposals 61 and 62, the Department states that *"basing commercial fishing opportunity on sockeye salmon abundance rather than king salmon abundance as the primary tool for king salmon rebuilding has been controversial, because rebuilding king salmon becomes secondary to sockeye salmon harvest opportunity once the trigger is met."*

This statement risks obscuring important context that is otherwise present in the Department's discussion, and the Board's stated intent of the plan in Board of Fisheries Finding 2023-303-FB. The Stock of Concern Management Plan was not designed to prioritize sockeye salmon harvest over king salmon rebuilding, nor to replace king salmon-based management with sockeye-based management. Rather, it reflects a deliberate, Board-directed effort to conserve king salmon **under conditions of known assessment uncertainty**, while maintaining abundance-based management and shared conservation burden across fisheries.

As the Department notes in its comments, in-season king salmon abundance estimates are subject to substantial uncertainty, particularly during periods of high sockeye passage when kings represent a very small fraction of total fish counted. The plan is structured to account for that reality. King salmon status and abundance trends determine **when** heightened conservation measures apply, while sockeye salmon abundance determines **how** those conservation measures are implemented; scaling actions so they are biologically meaningful, operationally consistent, and responsive to widely varying run sizes and timing.

Without this context, the Department's statement can be interpreted as suggesting that king salmon rebuilding becomes secondary under the plan once the commercial fishery opens. In fact, the opposite is true: the plan uses sockeye-scaled tools precisely because they are the most reliable way to implement abundance-based conservation actions when king salmon abundance is low and king salmon assessment precision is limited, ensuring that king salmon conservation remains active and effective before and throughout the commercial fishery, consistent with the Board's stated intent in adopting the Stock of Concern Management Plan.

The Historical Context Matters and Is Foundational

The current Stock of Concern Management Plan is the product of a deliberate, Board-directed process that began at the 2018 Bristol Bay Board of Fisheries meeting.

At that meeting, the Board heard testimony on Proposals 41 and 42, which sought a mechanism to pair restrictions between the sport and commercial fisheries for king salmon conservation. In response, the Board removed several existing plan triggers affecting the sport fishery to provide managers greater flexibility in dealing with uncertainty and imprecision in escapement information, tabled Proposals 41 and 42, and established the Nushagak King Salmon Management Committee through RC 84 to develop a comprehensive solution.

This action reflected a clear and consequential determination by both the Board and the Department.

As documented in RC 84 (2018), uncertainty in sonar-based king salmon escapement estimates had reduced the usefulness of prescriptive management and *“may have caused unwarranted restrictive actions.”* The Board’s adoption of RC 51 (2018), which removed intermediate sonar-based triggers from regulation, was an explicit acknowledgment that **multi-tiered, prescriptive regulatory actions tied directly to projected king salmon abundance were not defensible under existing data limitations.**

While the immediate regulatory changes applied to the sport fishery, the underlying conclusion was broader and foundational: **king salmon abundance estimates, as they existed in 2018, were not sufficiently precise to serve as the sole basis for management actions.**

That determination framed everything that followed.

The Committee Process Was Built on That Understanding

The Nushagak King Salmon Committee was chartered by the Board because of the determination that prescriptive management structures tied directly to king salmon numbers were not acceptable, given known uncertainty in king salmon assessment.

Accordingly, the committee was explicitly charged to develop a **comprehensive solution** that:

- Accounted for uncertainty in escapement goals and in-season assessment,
- Avoided reliance on multi-tiered triggers based solely on king salmon abundance, and
- Conserved king salmon while avoiding unnecessary and uneven restrictions across fisheries.

Between 2019 and 2022, the committee, comprised of representatives from commercial, sport, and subsistence fisheries, technical experts, and ADF&G staff, operating by consensus, evaluated extensive technical analyses addressing sonar uncertainty, run timing, fishery selectivity, and the performance of various management structures.

Among the themes that emerged from discussion and analysis was the recognition that **fixed numeric triggers perform inconsistently across the wide range of sockeye run sizes observed in the Nushagak District**, producing variable conservation benefit and disproportionate opportunity costs depending on sockeye run strength.

What the Plan Does

It is essential to be precise about how the Stock of Concern Management Plan functions, because its structure does not support the interpretation that *rebuilding king salmon becomes secondary to sockeye harvest opportunity*.

Stock of Concern designation activates the plan

The plan applies **while Nushagak River king salmon are listed as a stock of management concern**, and it is intended to remain in effect for the duration of that designation. That designation reflects sustained trends in king salmon abundance and performance relative to escapement goals. In this sense, the use of the plan is fundamentally driven by (low) king salmon abundance and status.

While the stock is designated a Stock of Concern, the Board directed in the SOC Management Plan, subsection (b), that all Nushagak District salmon stocks be managed conservatively to protect king salmon, consistent with the Sustainable Salmon Fisheries Policy. To protect king salmon as directed, the plan institutes **commercial fishery start triggers, sockeye salmon Optimal Escapement Goals (OEGs), and annual limits in the sport fishery** that are more conservative than the underlying regulations, sustainable escapement goals and management practices. These plan elements are in place *because* king salmon are a Stock of Concern, to directly afford king salmon conservation, and are not *secondary to* sockeye salmon management.

King salmon abundance activates the strictest conservation actions

Within the Stock of Concern framework, projected king salmon abundance determines when the most restrictive commercial conservation measures apply. The plan explicitly requires that before June 28, *if the Nushagak River king salmon inriver run is projected to be less than 95,000 fish*, the commissioner must close the commercial sockeye salmon fisheries until reopening criteria are met.

This 95,000-fish benchmark activates stringent in-season commercial restrictions within the plan, and it is directly tied to king salmon abundance. Notably, the threshold is set well into the SEG range, as opposed to the lower bound of the SEG. At this level, the plan applies its highest level of protection not only to poor king salmon runs not expected to meet the SEG lower bound, but also to king salmon runs strong enough to achieve escapements expected to produce the highest levels of future king salmon yields.

Sockeye abundance scales how conservation is implemented

When the 95,000 king salmon projection threshold is not being met, opening of the commercial fishery is conditioned on sockeye passage start triggers expressed as percentages of the sockeye run size. These triggers were intentionally designed to scale with sockeye abundance so that conservation actions result in a consistent and meaningful delay in the fishery across a wide range of sockeye salmon run sizes, including the very large run sizes observed in recent years, to ensure king salmon protection.

Unlike the commercial fishery start triggers, sockeye salmon Optimal Escapement Goals are not initiated by an annual king salmon abundance threshold, but instead are a standing conservation measure implemented as a result of the Stock of Concern designation. These percent-based, sockeye-scaled OEGs expand during large runs and contract during smaller runs, preserving king salmon conservation effectiveness while balancing opportunity costs. As sockeye runs increase in magnitude, more sockeye – and with them, more king salmon – pass the district and enter the river. Meeting higher OEGs requires managers to implement daily closures in fishing time *after* the commercial fishery opens, in addition to delaying the start of the fishery. The plan's sockeye salmon OEGs and resultant daily closures thereby *inherently ensure that rebuilding of king salmon does not become secondary to sockeye salmon harvest opportunity once the trigger is met*.

This function of sockeye salmon OEGs is not incidental. In the Board of Fisheries Finding 2023-303-FB adopted immediately following the implementation of the Stock of Concern Management Plan, the Board expressly stated that sockeye OEGs are intended to restrict early season fishing, reduce aggressive fishing later in the king salmon run, and provide continued protection of king salmon during both the early and latter portions of the run. The finding further explains that tiered OEGs are designed to scale conservation actions as sockeye run size increases, while ensuring adequate king salmon passage through the district.

King salmon abundance remains embedded in sport management

Finally, king salmon abundance remains an explicit management consideration in the sport fishery. While the Stock of Concern designation imposes annual limits on the harvest of large king salmon, the plan also allows for increased sport harvest opportunity if the total inriver king salmon run is projected to exceed 95,000 fish. This further underscores that king salmon abundance remains an active and explicit component of management under the plan.

This Is Not “Sockeye-Based King Management”

The Department’s statement risks conflating **management objectives** with **management levers**.

The objective of the Stock of Concern Management Plan is king salmon conservation. That objective is established through Stock of Concern designation and reinforced through king-based abundance thresholds embedded throughout the plan.

Sockeye abundance is used as a management lever because it is:

- Measured with substantially greater precision than king salmon abundance; and
- The only practical mechanism available to scale king salmon conservation consistently across extreme sockeye run-size variability.

This distinction, king salmon abundance and status determining **when** conservation applies, and sockeye abundance determining **how** conservation is implemented, was a central outcome of the committee process and was relied upon by the Board in adopting the 2023 plan. This distinction is further reinforced by the Board of Fisheries Finding 2023-303-FB, which states that sockeye salmon OEGs are intended to guide restrictive management actions throughout the king salmon run, including after fishing begins, to ensure continued king salmon conservation.

Closing

BBSRI respects the Alaska Department of Fish and Game’s role in managing Bristol Bay fisheries and values its long-standing collaborative relationship with the Department. We share the Department’s recognition of the challenges inherent in managing Nushagak River king salmon under conditions of assessment uncertainty, mixed-stock fisheries, and highly variable run sizes.

Our intent in submitting this response is not to dispute the Department’s broader analysis or conservation objectives, but to ensure that the Board has an accurate understanding of the rationale behind the Stock of Concern Management Plan and the way it is structured to function in practice.

The plan does not prioritize sockeye harvest opportunity over king salmon rebuilding. Rather, it reflects the Board’s direction, developed through a multi-year, Board-chartered committee process, to conserve king salmon effectively while avoiding false precision and ensuring that conservation actions are scaled in

a biologically meaningful and operationally consistent manner. King salmon status and abundance determine when heightened conservation applies; sockeye abundance determines how those conservation actions are implemented before and during the commercial fishery. This understanding is consistent with the Board's intent, as documented in Board of Fisheries Finding 2023-303-FB, which clarifies that sockeye-scaled management tools are intended to guide restrictive management actions before and throughout the commercial fishery to ensure continued protection of king salmon.

We agree with the Department that abundance-based management, shared conservation burden, and responsiveness to in-season information are essential principles in Bristol Bay. The current plan embodies those principles as adopted by the Board.

For these reasons, BBSRI respectfully encourages the Board to evaluate the Stock of Concern Management Plan, and any proposed changes to it, in light of its full historical context, regulatory design, and relevant Board Findings.

Publicly Available Background Materials

The following publicly available documents provide much of the background discussed in this document:

- *Historical Review of Nushagak River King Salmon Management (2022)*
- *Summary of Outcomes from the Nushagak King Salmon Committee (2019–2022)*
- *Summary of Outcomes from the 2022-2023 Board of Fisheries related to Nushagak King Salmon (2025)*

These documents are available on the Bristol Bay Science and Research Institute website and were prepared for public and Board review (www.bbsri.org/king-committee).

Appendices – Board Record Documents Provided for Reference

The following appendices are provided solely for the convenience of the Board and the public. Each document is part of the existing public record of the Alaska Board of Fisheries and is included here simply for ease of locating these historical documents.

These materials are not offered as new evidence, but as readily accessible references reflecting Board direction and intent relevant to the Nushagak District King Salmon Stock of Concern Management Plan.

Appendix A

RC 84 (2018 Bristol Bay BOF Meeting) – Board of Fisheries Record Change establishing the Nushagak King Salmon Management Committee and documenting the Board’s recognition of uncertainty in in-season king salmon abundance estimates and the need for a comprehensive, committee-based management approach.

Appendix B

Board of Fisheries Finding 2023-303-FB – Board Finding adopted following implementation of the Nushagak District King Salmon Stock of Concern Management Plan, documenting Board intent regarding the role of sockeye salmon Optimal Escapement Goals and continued conservation measures before and during the commercial fishery.

Appendix A: RC84 - 2018 Bristol Bay BOF Meeting

Submitted by ADF&G at the request of Board Member Ruffner, December 2, 2018

Nushagak-Mulchatna King Salmon Management Plan (NMKSMP)

At the 2018 Bristol Bay meeting held in Dillingham, proposals were submitted that called for changes to the NMKSMP (5 AAC 06.361). A small group of stakeholders including the author of two relevant proposals met with three members of the Alaska Board of Fisheries (Board) and multiple Alaska Department of Fish and Game (ADF&G) staff. There was a consensus in the group to modify the NMKSMP by striking provisions (d) 2 and 3 as described in (RC51). This removes sonar triggers that auto-restrict the sport fishery. Removing these trigger provisions from NMKSMP (RC51) will allow ADF&G to consider sonar data along with other in-season information in managing fisheries to ensure the escapement goal is met.

The parties present recognized two concerns that need additional consideration:

- 1) Uncertainty in sonar data used to establish the king salmon escapement goal and recent in-season issues with the accuracy and precision of sonar counts may have caused unwarranted restrictive actions.
- 2) Restrictions in the sport fishery for king salmon without actions in the commercial sockeye fishery may or may not be achieving necessary conservation needs and should be considered in the context of sharing a conservation burden.

To address these concerns, ADF&G in collaboration with a stakeholder-led study team will review all data related to the enumeration of Nushagak River king salmon, and identify options to improve this information and management of Nushagak River king salmon. To support this effort, ADF&G would accelerate updating the Nushagak River king salmon escapement goal prior to March 2020. The study team will provide a progress report to the board at the October 2019 work session.

Concurrent with the technical enumeration study effort, the Board Chair will appoint a working committee (WC) consisting of no more than 9 members of the public and 3 members of the board for a total of 12. The WC will be supported by the technical study team and provide input to the help guide the team's work products. The WC committee will meet prior to the Oct. 2019 Board Work Session, receive a preliminary update from ADF&G on the enumeration efforts and set a schedule that includes a target of generating a proposal for any changes to NMKSMP to the Board for consideration at the Statewide Meeting in March 2020. This schedule signals the intent of this board to address the topic of the NMKSMP before the next regular Bristol Bay cycle if new information can refine the plan; however, it does not guarantee any particular outcome.

In addressing the allocative issue, the WC will acknowledge and adhere to the goals of the Sustainable Salmon Policy (5 AAC 39.222), as well as the concept of sharing the conservation burden as outlined in the Sustainable Salmon Policy. The WC will also recognize and consider that any hard trigger closures need to acknowledge tradeoffs between sockeye and king salmon. (i.e. is it in the best interest of the state to forego 100,000 sockeye salmon for 1,000 king salmon; 1,000,000 for 10?)



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PC32

ALASKA BOARD OF FISHERIES

Finding in the Establishment of Optimal Escapement Goals for Nushagak River Sockeye Salmon for the Conservation of King Salmon 2023-303-FB

The creation of an OEG for Nushagak River sockeye salmon provides guidance to managers to restrict early season fishing for sockeye salmon to allow for king salmon passage through the district. The tiered OEG seeks balance between allowing for restrictive actions to protect king salmon while at the same time setting upper guidelines for controlling sockeye salmon escapement.

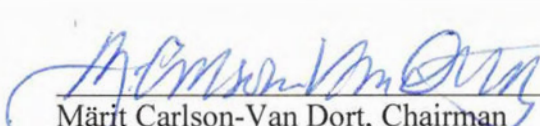
An OEG provides guidance for consistently conservative management steps based on the preseason forecast sockeye salmon run size. Setting OEG tiers that are greater than the upper end of the sustainable escapement goal for Nushagak River sockeye salmon allows more conservative management and less fishing time on sockeye salmon. Less fishing, especially early season, will reduce king salmon commercial harvest. A tiered OEG provides a sliding scale of implementation to reduce the potential for sockeye salmon over escapement as sockeye salmon run size increases while providing for king salmon conservation.

In addition to conserving the earlier portion of the king salmon run, OEGs should reduce the need to prosecute the sockeye salmon fishery aggressively during the latter portion of the king salmon run since the OEGs are larger than the SEG and accommodate a broader range of sockeye salmon escapement levels than the SEG. It is the board's intent that the department manage the commercial sockeye salmon during the latter portion of the king salmon run to ensure that portion of the king salmon is adequately protected.

VOTE: 6-0

Date Adopted: March 12, 2023

Anchorage, Alaska


Märit Carlson-Van Dort, Chairman
Alaska Board of Fisheries

Performance Assessment of the 2023 Nushagak District King Salmon Stock of Concern Management Plan

Prepared by:

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Prepared for:

Nushagak River and District Fishery Stakeholders

November 3, 2025

EXECUTIVE SUMMARY

In March 2023, the Alaska Board of Fisheries adopted the **Nushagak District King Salmon Stock of Concern Management Plan** in response to the continued decline of Nushagak River king salmon. The new plan, developed through a five-year, stakeholder-driven process that involved commercial, sport, and subsistence users alongside agency and technical experts, represents a significant restructuring of management for commercial, sport, and subsistence fisheries. The plan is intended to remain in effect as long as Nushagak River king salmon are designated a Stock of Concern.

This report provides an objective evaluation of how the plan has functioned in its first three years (2023–2025), with particular attention to the conservation actions taken, their performance, and alignment with the management objectives and measures of success identified during the committee process.

Key Conservation Actions

The plan introduced three primary changes:

1. **Commercial Fishery Start Triggers:** New triggers for both the Wood and Nushagak Rivers, delay the start of the commercial salmon fishery and thereby afford king salmon additional protection while the ratio of king salmon to sockeye salmon remains relatively high in the district.
2. **Sockeye Salmon Optimal Escapement Goals (OEGs):** Larger escapement targets, scaled to sockeye run size, allow the manager to take breaks in sockeye commercial fishing for king salmon conservation and replace the need for prescriptive regulatory changes to time, area and/or gear.
3. **Sport Fishery Annual Limit:** Reduced harvest opportunity for large king salmon by limiting anglers to one fish ≥ 28 inches per year. Protecting large, fecund king salmon and safeguarding the reproductive potential of the stock.

Performance of the Plan

- **Commercial Fishery:**

The plan consistently delayed the start of the commercial fishing season by 2–5 days compared with the prior plan (Table 3). The delay of the start of the commercial fishery due to the new triggers has resulted in 6.5–10.8 thousand additional king salmon and 1.2–1.5 million additional sockeye salmon passing upriver each year before exposure to harvest (Table 3). OEGs allowed longer in-season closure

windows, reducing harvest pressure and allowing more king salmon to pass through the district unharvested (Figures 1 & 2; Appendix G). While the exact split in benefits between delayed openings and in-season closures is difficult to pin down, both mechanisms played a substantial role in conserving king salmon.

- **Sport Fishery:**

Participation continued a declining trend and regulations further limited harvest of large king salmon.

Management Objectives & Measures of Success

The plan was designed to balance conservation of king salmon with opportunity across all user groups. While escapement goals for king salmon have not yet been achieved due to continued low production, the plan demonstrably reduced harvest pressure during periods of high vulnerability. It has also provided managers with flexibility to adapt to unprecedentedly large sockeye runs while providing conservation benefits for king salmon.

Conclusions

Because king salmon lifecycles span 4–7 years, tangible improvements in run strength and long-term biological outcomes from plan actions cannot yet be expected or assessed.

However, the first three years of implementation show that the **2023 management plan appears to be functioning as intended**. It has delayed fishery openings, reduced fishing time, increased escapements of both king and sockeye salmon, and enhanced protection for large king salmon in the sport fishery.

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Introduction

At its March 2023 meeting, the Alaska Board of Fisheries substantially changed how Nushagak River and District fisheries are managed to conserve Nushagak River king salmon. The board adopted a new *Nushagak District King Salmon Stock of Concern Management Plan* in effect for as long as Nushagak River king salmon remain a Stock of Concern. The board also substantially modified the pre-existing *Nushagak-Mulchatna King Salmon Management Plan*. The 2023 plans can be found in Appendix A and B.

The Nushagak King Salmon Committee, established in 2018 and facilitated by the Bristol Bay Science and Research Institute Study Team, was instrumental in development of the new plans. Efforts by the committee and board are reviewed and discussed in detail in *Summary of the 2022-2023 Alaska Board of Fisheries process and outcomes related to the Nushagak River King Salmon Committee and Nushagak River king salmon conservation* (Brookover et al. 2025).

Three fishing seasons have now passed since the plans were adopted, and the board is scheduled to again address Bristol Bay issues including Nushagak River king salmon in January 2026. Given its role in the 2023 regulatory changes, the BBSRI Study Team set out to develop an assessment of how the new plans have worked to conserve Nushagak River king salmon during their first three years for consideration in January.

The assessment is envisioned to include an objective evaluation of actions taken under the new plans, and stakeholder input on the success of the plans in achieving their objectives. This paper presents the objective assessment. The Study Team intends to subsequently use a questionnaire to gather and summarize stakeholder input. This paper will be presented to stakeholders with the questionnaire. Both will be summarized and presented to the public and board before the January meeting.

Key Plan Conservation Actions

The Stock of Concern Management Plan (Appendix A) includes three key provisions aimed at conserving Nushagak River King salmon. Other provisions in the modified NMKS Management Plan include actions that were largely either already in place or superseded by the SOC Management Plan and are not discussed here. The key provisions adopted in 2023 include new sockeye salmon Optimal Escapement Goals, modified commercial fishery start triggers, and revised king salmon annual limits in the sport fishery.

Sockeye Salmon Optimal Escapement Goals

New sockeye salmon Optimal Escapement Goals are found in SOC Management Plan Sections (c)(3) for the Wood River and (c)(5) for the Nushagak River (Appendix A). Both are designed to boost king salmon escapement into the Nushagak River by providing a larger number of sockeye salmon into the rivers than the established Sustainable Escapement Goals (SEGs) during large sockeye runs. The OEGs use a sliding scale depending on the forecasted run size for sockeye salmon to allow for king salmon conservation scaled to sockeye run strength. The OEGs allow the manager to take breaks in fishing for king salmon conservation and preclude the need for prescriptive regulatory changes to time, area and/or gear that would otherwise be needed to afford a similar level of conservation.

OEGs were established for each of the past three seasons as directed by the plan because total run forecasts exceeded the plan thresholds of 5 million sockeye salmon for Wood River and 2.5 million for Nushagak River. OEG upper bounds established for 2023-2025 are presented in Table 1 (Elison et al. (2024), Elison et al. (2025), ADF&G (2025)). The OEG lower bound is the same as the SEG lower bound.

Table 1 -Wood and Nushagak River sockeye salmon SEG and OEG (in millions of fish), 2023-2025.

Year	SEG		Total Run Forecast	15% Adder	OEG Upper Bound		
	Lower Bound	Upper Bound			Calculated	Official (Rounded)	
Wood River							
2023	0.700 -	1.800	8.010	1.202	3.002	3.0	
2024	0.700 -	1.800	7.840	1.176	2.976	3.0	
2025	0.700 -	1.800	7.630	1.145	2.945	3.0	
Nushagak River							
2023	0.370 -	0.900	6.950	1.043	1.943	2.0	
2024	0.370 -	0.900	3.500	0.525	1.425	1.4	
2025	0.370 -	0.900	10.580	1.587	2.487	2.5	

Managers use emergency order authority to attain the larger OEGs and associated king salmon conservation by regulating commercial fishing time. The way managers regulate time can be characterized in two ways: delay the start of the commercial fishery for sockeye salmon when king salmon are more abundant, and schedule closed periods during the commercial fishery and latter portion of the king salmon run.

Commercial Fishery Start Triggers

Modified commercial fishery start triggers, including a new trigger specifically for the Nushagak River, are found in Section (d) of the plan. This section applies to the early season before 9:00 am June 28 during years when the Nushagak River inriver goal (95,000 king salmon) is not expected to be met. It directs managers to leave the commercial fishery closed until projected escapements exceed levels stated in the plan.

The 2023 plan triggers (10% of the Wood River run forecast and 6% for the Nushagak run forecast) are intended to delay the start of the commercial salmon fishery and thereby afford king salmon additional protection while the ratio of king salmon to sockeye salmon remains relatively high. For comparison, the trigger within the prior version of the NMKS Management Plan applied only during years when the king salmon escapement was projected to be less than the SEG (55,000) and directed the commercial fishery to remain closed until the projected sockeye salmon escapement into the Wood River exceeded 100,000 fish. The new triggers thus apply during more years, consider the Nushagak sockeye escapement as well as the Wood, and afford additional time early in the season when the commercial fishery remains closed.

Table 2 includes the triggers that applied in 2023, 2024 and 2025. Triggers applied for all years because the king salmon inriver run goal was not projected to be met in any year.

Table 2.- Commercial fishery start trigger projections (millions of fish), 2023-2025.

Year	Total Run Forecast	Fishery Start Trigger Projection
Wood River (10%)		
2023	8.010	0.801
2024	7.840	0.784
2025	7.630	0.763
Nushagak River (6%)		
2023	6.950	0.417
2024	3.500	0.210
2025	10.580	0.635

Sport Fishery Annual Limit

The modified annual limit is found in section (e) of the plan. Like the regulations prior to 2023, the provision implements an annual limit of four king salmon (20 inches or greater) for all anglers. Unlike the previous regulations, the new provision limits the number of large (28 inches or greater) king salmon an angler can harvest to one per year. The new regulation thereby affords additional protection to king salmon, particularly large king salmon, compared to previous regulations which allowed anglers to keep up to four large king salmon per year.

How Conservation Actions Performed the First Three Years

The Nushagak River king salmon runs in 2023 and 2024 were not large enough to meet the SEG lower bound of 55,000 fish had every fish survived to spawn (Elison et al., 2025). Data for 2025 remains partially unavailable but will likely show the same result once available. Data collected by current stock assessment projects for Nushagak River king salmon are fraught with uncertainty (Head and Hamazaki, 2022). With this data uncertainty in mind, the SEG has likely not been attained since the SOC Management Plan was adopted.

Because king salmon life cycles span 4-7 years, tangible improvements in run strength and long-term biological outcomes from plan actions cannot yet be expected or assessed. This section will describe how the new plan worked to conserve Nushagak River king salmon in the commercial and sport fisheries.

Commercial Fishery Results

This section discusses the performance of the SOC Management plan provisions pertaining to the commercial fishery in a chronological fashion. The fishery start trigger is discussed first, since it is implemented first seasonally, followed by conservation during the latter period of the king salmon run during the commercial fishery as provided by the OEG.

Opening Date

The effectiveness of the SOC Management Plan's fishery start triggers can be evaluated by comparing when commercial fishing opened in 2023-2025 under the new plan to when it would have hypothetically been opened under the previous NMKS Management Plan (Elison et al. (2024), Elison et al. (2025), Tim Sands, personal communication). Estimates of additional salmon passage afforded by the current plan's trigger provisions were derived by

identifying the daily escapement count that fell within the assumed travel windows for each stock between the previous plan's hypothetical start date and the start date that occurred under the new management plan. Assumed travel times used from the district to the Wood River tower is 12-24 hours, and 36-48 hours from the district to the Nushagak River sonar. Appendix C contains actual and hypothetical start dates and associated additional king and sockeye salmon passage estimates. For an example of how the current trigger provisions worked to conserve king salmon, a detailed review of 2025 is discussed below.

2025

In 2025, ADF&G Advisory Announcement #9, issued noon June 21, opened the commercial fishery June 22 at 9:00 am for set nets and 11:00 am for drift nets (Appendix C). Sockeye escapement counts through 10:00 am June 21 had totaled 485,000 in the Nushagak and 114,000 through 6:00 am in the Wood River. At the time (through June 20), 6,645 king salmon had been estimated past the Nushagak sonar.

Start trigger provisions in the SOC Management Plan were successfully implemented in 2025. Estimated passage at the Nushagak sonar exceeded the start trigger (635,000 sockeye salmon) June 21, after the announcement was issued and before the fishery opened; the cumulative June 21 sonar count was 756,000 sockeye salmon.

Assuming a 36- to 48-hour travel time from the district to the Nushagak River sonar means that fish passing the district before the fishery opened would continue to migrate past the sonar through the remainder of June 22 and June 23. Through June 23, 16,227 king salmon and 1,480,862 sockeye salmon were estimated past the sonar. These estimates account for nearly half of the total escapement over the season for king and sockeye salmon.

Assuming a 12- to 24-hour travel time to the Wood River counting tower means that 619,752 sockeye salmon counted past the tower by midnight June 22 had also migrated past the district before the commercial fishery opened.

Had the previous version of the plan been in effect, the fishery would have opened earlier, and fewer king (and sockeye) salmon would have passed the district before the commercial fishery opened. The total spawning escapement of king salmon at the sonar would very likely have been projected to be less than 55,000 fish, and under that scenario the previous version of the plan directed the department to close the commercial fishery until the projected Wood River sockeye escapement exceeds 100,000 fish.

This standard would likely have triggered a fishery opening four tides (two days) earlier, to begin June 20 because 113,000 sockeye salmon had passed the Wood River tower through that date. We reasoned the opening would likely have been scheduled for the morning

because over 83,000 sockeye salmon – very close to the 100,000 fish trigger - had passed the Wood River tower through midnight June 19. Assuming the same travel times as above, Nushagak River salmon counts through June 21 can be used for comparison. Through June 21, 9,766 king salmon were estimated past the sonar. In this scenario, the new trigger provision protected about 6,500 additional king salmon ($16,227 - 9,766 = 6,461$). Using a similar approach for sockeye salmon, the new provisions resulted in about 506,000 additional sockeye salmon in the Wood River and 725,000 in the Nushagak.

3-Year Summary

The department opened the commercial fishery as directed under the new SOC Management Plan in all three years. In 2023 and 2024, trigger levels for Wood and Nushagak River sockeye were achieved following the fishery opening and within assumed travel time windows (Appendix C). In both years, the Nushagak River trigger was achieved the day the fishery opened, and the Wood River trigger the following day. In 2025, the Nushagak River trigger was attained after the fishery announcement and before the fishery opening and the Wood River trigger the day after the fishery opening.

Hypothetical start dates under the previous version of the plan fell 2 to 5 days (average 3.3 days) earlier than the actual fishery openings in 2023-2025 (Table 3). In effect, the fishery was opened under the current plan 3 days later in 2023, 5 days later in 2024, and 2 days later in 2025.

In this scenario, the delayed openings each year resulted in an additional 6,500 – 10,800 king salmon passing the district before it was opened to fishing that otherwise would have been exposed to fishing pressure. Using estimates of total run provided in Elison et al. (2025), the additional passage represents approximately 21 percent of the total run in 2023 and 20 percent in 2024.

Table 3.- Actual vs hypothetical fishery opening dates and associated salmon passage.

Year	Actual Opening Date	Hypothetical Opening Date	# Days Difference	Additional Salmon Passage		
				Nushagak King Salmon	Nushagak Sockeye Salmon	Wood River Sockeye Salmon
2023	25-Jun	22-Jun	-3	8,304	625,810	861,318
2024	26-Jun	21-Jun	-5	10,794	707,044	791,208
2025	22-Jun	20-Jun	-2	6,461	725,179	506,370

The delayed fishery also resulted in an additional 626 - 725 thousand sockeye passing into the Nushagak River and 506 – 861 thousand into the Wood River each year. These

estimates represent 9, 8 and 5 percent (average 8 percent) of the total sockeye salmon run to the district (Appendix D; Elison et al. (2025), ADF&G (2025)).

Limitations to this evaluation of the fishery opening date are substantial. There is much uncertainty with Nushagak River sonar estimates. Assumed travel times are imprecise; travel times vary among fish and throughout the season based on individual fish characteristics, weather, tides and other factors. When managers would open the fishery under the previous plan is not certain and would also vary with several factors. Estimates of additional passage due to the delayed fishery opening represent fish potentially available for harvest, as opposed to actual harvest. Nevertheless, we undertook this exercise to quantify fishery performance under the new plan provisions using existing information to the extent possible. Results should be used with these limitations in mind.

Conservation During the Latter Portion of the Run

King salmon conservation during the latter portion of the run is affected by multiple factors associated with the commercial (and other) fisheries. These include: inriver management goals (in this case OEGs); king salmon and sockeye salmon run size, abundance and distribution; fishing effort (no. of permits, boats, sites) and patterns, fishing time; weather and other factors. Most factors are dynamic and can change on a tidal basis. This assessment focused on fishing time because it is the primary factor under the manager's control used to achieve established OEGs and thereby conserve king salmon.

Commercial fishing time was assessed by comparing performance over the three years since the plan was adopted (2023-2025) with a 3-year period before the plan was adopted to understand how the SOC Management Plan conserved king salmon during the commercial fishery for sockeye and the latter portion of the king salmon run. For the latter period, we chose 2017-2019 for two reasons. One was that sockeye production had resulted in large (greater than 10 million) runs to the district beginning in 2017 and continuing to present years. So, the period 2017-2019 captured large sockeye salmon runs like those observed more recently. And two, the department began managing the commercial fishery more conservatively than plans directed for king salmon after several years of large sockeye runs (and small king salmon runs). Thus, the three early years of large sockeye runs provide a clearer contrast to the new plan's performance in comparison to the old plan than 2020, 2021 and 2022, when the department had begun managing "outside" of the existing plan.

Fishing Time

Once the fishery opened, managers scheduled periods of time open to fishing interspersed with closed periods on a tide-by-tide basis to regulate harvest and thereby achieve sockeye

salmon OEGs and allow king salmon to pass through the district without exposure to harvest.

The commercial drift net fishery opened an average of 3.7 days later from 2023-2025 when compared with 2017-2019 (Appendix E) due in large part to the start trigger provisions as discussed above.¹

During 2023-2025, total drift fishing time between June 20 and 25 was reduced by roughly 40 hours (75%) per year compared to 2017-2019 (Table 4; Figure 1). Drift fishing was opened on only five days prior to June 26; one day in 2023 and four days in 2025 for an average of 8 hours/day. During 2017-2019 for comparison, drift fishing was opened each of the six days from June 20-June 25 except 2017, when it was opened four of the six days, and averaged about 10 hours per day.

Table 4.- Average number of hours open to commercial drift gillnet fishing per year in the Nushagak District by period, comparing 2017-2019 and 2023-2025.

Time Block	2017 - 2019	2023-2025	Reduction (hrs)	Reduction (%)
	Annual (hrs)	Annual (hrs)		
June 20-25	53.5	13.5	40.0	74.8%
June 26-30	86.5	49.5	37.0	42.8%
July 1-5	88.5	80.8	7.7	8.7%
June 20-July 5	228.5	143.8	84.7	37.1%

¹ Sources: Elison et al. (2018), Salomone et al, (2019), Tiernan et al. (2021), Elison et al. (2024), Elison et al. (2025), Tim Sands, personal communication.

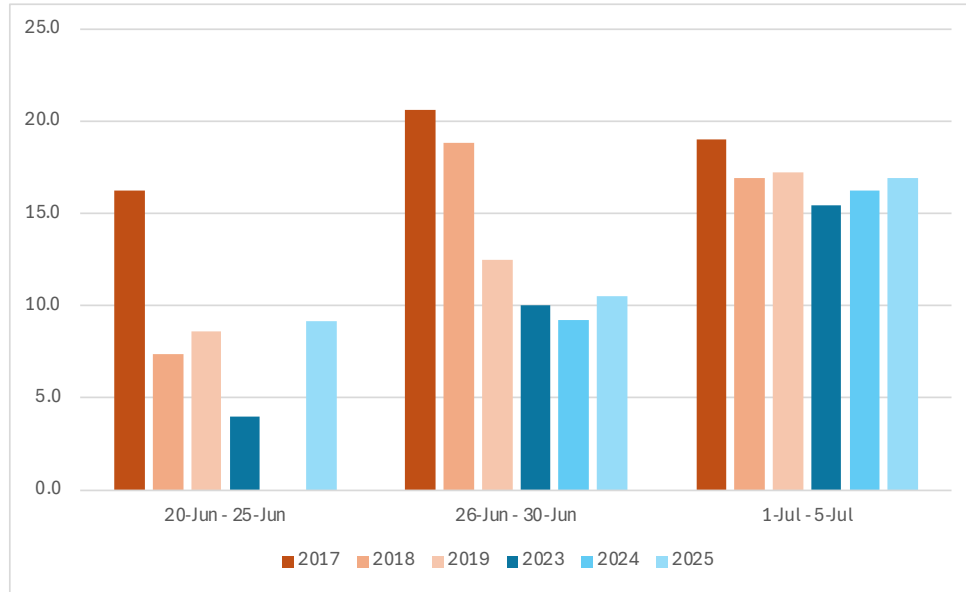


Figure 1.- Average number of hours open to commercial drift gillnet fishing per day in the Nushagak District by period.

Note: in 2023, fishing was only open for 1 day between 20 June and 25 June for 4 hours. In 2024, fishing was not opened between 20 June and 25 June. In 2025, fishing was open for 4 days between 20 June and 25 June and averaged 9 hr/day.

In addition to being open fewer days, the drift fishery was also opened for fewer total hours per year across the entire early-season (June 20-July 5): 144 hours versus 229 hours in 2017-2019, representing a 37% reduction in overall drift fishing time. These reductions were most pronounced during the early portion of the season (June 20-30), when king salmon overlap with the commercial fishery is greatest.

Trends in fishing time for setnets were similar, but the reductions were even more pronounced. The fishery opened to set nets an average of 4.3 days later per year from 2023-2025 when compared with 2017-2019 (Appendix Table F).² Total set-net fishing time per year between June 20 and 25 decreased by about 87 hours (83%), and across the entire June 20-July 5 period, total time open per year was reduced from 341 hours to 184 hours, a 46% decrease (Table 5).

² Sources: Elison et al. (2018), Salomone et al. (2019), Tiernan et al. (2021), Elison et al. (2024), Elison et al. (2025), Tim Sands, personal communication.

Table 5.- Average number of hours open to commercial set gillnet fishing per year in the Nushagak District by period, comparing 2017-2019 and 2023-2025.

Time Block	2017 - 2019	2023-2025	Reduction (hrs)	Reduction (%)
	Annual (hrs)	Annual (hrs)		
June 20-25	104.7	18.0	86.7	82.8%
June 26-30	120.0	65.0	55.0	45.8%
July 1-5	116.7	101.5	15.2	13.0%
June 20-July 5	341.3	184.5	156.8	45.9%

These reductions again occurred during the early portion of the run when conservation benefits for king salmon are the greatest.

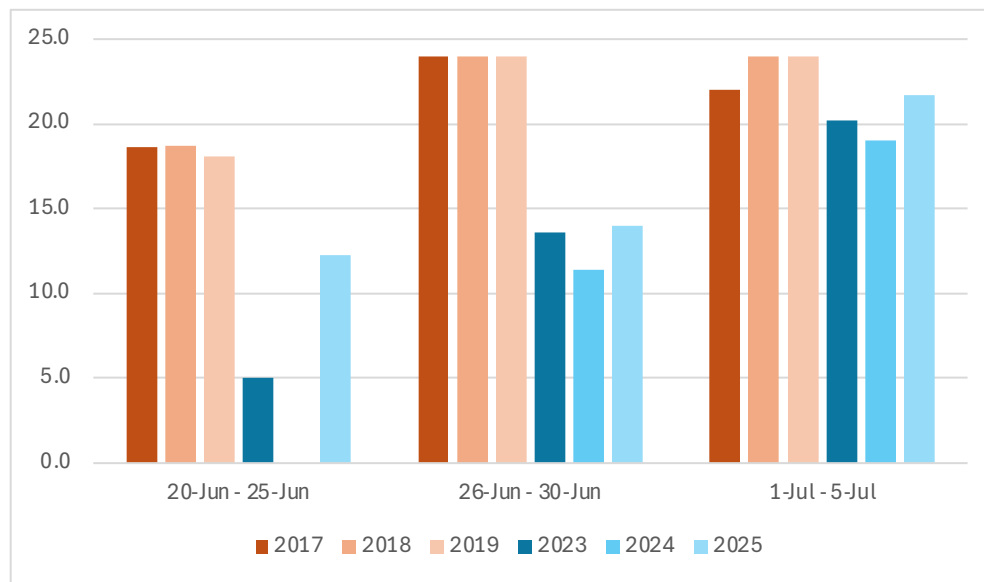


Figure 2.- Average number of hours open to commercial set gillnet fishing per day in the Nushagak District by period.

Note: in 2023, fishing was only open for 1 day between 20 June and 25 June for 5 hours. In 2024, fishing was not opened between 20 June and 25 June. In 2025, fishing was open for 4 days between 20 June and 25 June and averaged 12.3 hr/day.

Optimal Escapement Goals

New optimal escapement goals for Wood and Nushagak River sockeye salmon were met or exceeded in 2023, 2024 and 2025 (Table 6; Elison et al. (2025), ADF&G (2025)).

Escapements for the Wood and Nushagak River fell within the upper portion of the OEG range in 2023. Escapements in 2024 exceeded the OEG Upper Bound for both rivers; by 1.4 million fish in the Wood and 300 thousand in the Nushagak. In 2025, Wood River escapement fell within the upper portion of the OEG range and Nushagak escapement exceeded the OEG range by about 800 thousand sockeye salmon.

Differences between actual escapements and SEG Upper Bounds represent sockeye salmon which were not available for harvest because of reduced fishing time for king conservation in accordance with the SOC Management Plan; absent the SOC Management Plan, these fish would have been available for harvest. Over the 3-yr period, 849 thousand to 2.6 million additional sockeye salmon migrated into the Wood River, and 823 thousand to 2.4 million sockeye salmon above the SEG Upper Bound migrated into the Nushagak River.

Table 6.- Sockeye escapement goals vs actual escapement estimates in millions of fish, 2023-2025.

	SEG					Difference between
	Lower		Upper	OEG Upper	Estimated	Escapement
Year	Bound		Bound	Bound	Escapement	and SEG UB
Wood River						
2023	0.700	-	1.800	3.002	2.649	0.849
2024	0.700	-	1.800	2.976	4.405	2.605
2025	0.700	-	1.800	2.945	2.657	0.857
Nushagak River						
2023	0.370	-	0.900	1.943	1.773	0.873
2024	0.370	-	0.900	1.425	1.723	0.823
2025	0.370	-	0.900	2.487	3.261	2.361

Both the delayed fishery starts and reduced fishing time during the season worked as intended under the OEG by reducing harvest and increasing escapement of both king and sockeye salmon. To compare the king salmon conservation benefits of delayed openings with that of the later-season closures, we can look at the estimates of additional sockeye passage in Tables 3 & 6 (Appendix G).

In 2025, the delayed opening resulted in an estimated 1.23 million additional sockeye salmon passing upriver (506,000 in the Wood River and 725,000 in the Nushagak River; Table 3). Relative to the total additional passage afforded by the OEG that year (about 3.22 million fish; Table 6; Appendix G), the delayed start accounted for roughly 38 percent. Breaks in fishing time after the season was underway contributed to the remaining 62 percent of additional conservation benefit in 2025.

Over all three years, delayed openings accounted for about 86 percent of the additional passage in 2023, 44 percent in 2024, and 38 percent in 2025. On average, the start triggers provided about 56 percent of the additional passage and corresponding king salmon conservation, while in-season breaks in fishing contributed to the other 44 percent (Appendix G).

However, it is important to recognize that this analysis rests on several assumptions. First, we likely overestimated the conservation benefits of the start triggers. If the fishery had opened earlier, not all the fish estimated to have passed would have been harvested, as they would have been subject to harvest rates lower than 100 percent. Some portion would still have escaped upriver regardless. At the same time, the analysis also assumes that under the old management plan scenario, managers could have held escapements within the SEG targets of 1.8 million sockeye salmon for the Wood River and 0.9 million for the Nushagak River. If that had not been possible, then we likely overestimated the conservation benefits attributed to later-season closure periods. In other words, there are biases in both directions. While the exact split in benefits between delayed openings and in-season closures is difficult to pin down, this comparison makes clear that both mechanisms played a substantial role in conserving king salmon, and that the combination of start triggers and later closures together are central to the effectiveness of the management plan.

Sport Fishery Results

Two trends have been observed in the sport fishery since the adoption of the SOC Management Plan in 2023.

Participation

Sport fishing effort estimated on the Nushagak River mainstem has generally declined from high levels observed in 2005 and 2006 (Alaska Sport Fishing Survey database [Internet]). This decline continued in recent years, and steepened in 2023, when an estimated 557 anglers fished on the Nushagak River from Black Point to the sonar site, and 861 from the sonar site to the Mulchatna River (Figure 3). The number of anglers fishing these sections in 2023 represent 41 percent and 67 percent of the average fishing effort from 2017-2022.

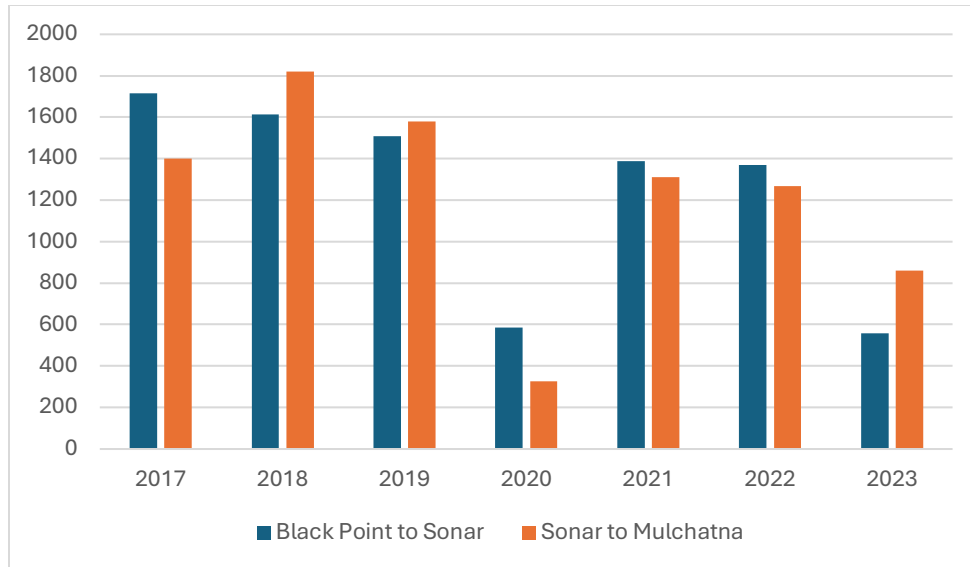


Figure 3.- Number of anglers sport fishing on two Nushagak River sections, 2017-2023.

Reasons for the general decline include factors such as economic conditions, expectations of fishing success and, in 2020, impacts from Covid. Angler uncertainty over the ability to harvest fish given the possibility of inseason catch-and-release restrictions is a likely factor contributing to both the longer-term decline and the reduced effort in 2023. Specific causes of the steep reduction in effort observed in 2023 are unknown. However, the reduced ability to harvest large fish under the annual limit provisions in the SOC Management Plan likely contributed to reduced effort in 2023 (Lee Borden, personal communication).

Biological Characteristics of Fish Harvested

The size, sex and age composition of king salmon harvested in the sport fishery exhibited similar declining trends. King salmon harvest sampled during ADF&G creel surveys conducted in 2023 and 2024 were 21 and 28 percent smaller than king salmon sampled in 2007 based on mean length (Table 7).³

King salmon 28 inches or greater in length, of which one is allowed per angler per year, comprised 27 percent and 14 percent of the sampled harvest in 2023 and 2024. Although the percentage of king salmon 28 inches or larger was not reported from the 2007 creel surveys, mean fish size reported that year was nearly 30 inches in length, indicating fish 28 inches or larger comprised over half of the harvest. Therefore, the percent of fish 28 inches or greater as sampled in 2023 and 2024 was less than half that sampled in 2007. Applying these percentages to available Nushagak River harvest estimates for 2023 (2,327 king

³ Sources: Dye (2012), Hayden-Pless (2024a), Hayden-Pless (2024b).

salmon; Alaska Sport Fishing Survey database [Internet]) results in an estimate of 507 king salmon 28 inches or greater. For comparison, king salmon 28 inches or greater comprised over half of the Nushagak River harvest estimated for 2006 (7,429 king salmon).

The percentage of females in the harvest samples was also lower in 2023 and 2024.

Table 7.- Biological sampling results from ADF&G creel surveys conducted on the Nushagak River. Fish length measured mid-eye to tail fork.

Year	Sample Size	Mean Length (mm)	>28 inches		Females	
			Number	Percent	Number	Percent
2007	231	752				36%
2023	179	597	49	27%	39	22%
2024	202	542	28	14%	38	19%

Samples collected from harvested fish in 2023 and 2024 were comprised of younger age classes when compared with king salmon harvest sampled in 2007 (Figure 4). In 2007, age 1.3 and 1.4 fish were dominant and age 1.5 fish were present. Age 1.5 fish were absent, and age 1.4 fish comprised the weakest class in the samples in 2023 and 2024 indicating more older fish, which tend to be comprised mostly of females, were available to spawn.

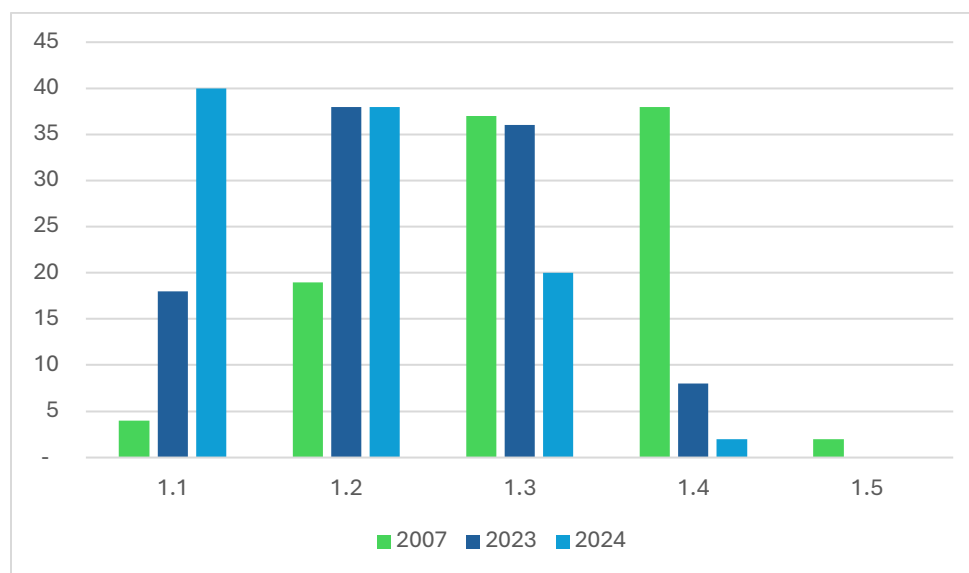


Figure 4.- Percent king salmon sampled from sport harvests by ADF&G creel surveys.

Based on creel survey results, sport harvests since the plan was adopted in 2023 are comprised of smaller king salmon, fewer females, and younger age fish. These trends,

likely due in part to the new annual limit provisions, are also likely due to differences in run composition and other factors in addition to harvest regulations.

Measures of Success

To conclude the assessment, the BBSRI Study Team will use a questionnaire to gather and summarize stakeholder input. Stakeholders may be asked to consider the Management Objectives developed by the Nushagak King Salmon Committee and adopted by the board in the 2023 NMKS Management Plan, as well as Measures of Success developed by the Committee. Both are presented here for reference and can be found in more detail in Brookover et al. (2022).

Management Objectives

- (1) to provide consistent sport fishing opportunity within and among seasons, including a level of inriver abundance as a given year's run timing allows, and a predictably open season.
- (2) to provide a directed commercial king salmon fishery when surplus is available.
- (3) to minimize disruptions to the commercial sockeye salmon fishery.
- (4) to provide reasonable opportunity for subsistence harvest of king salmon.
- (5) to ensure the subsistence fishery is the last fishery restricted or closed.
- (6) to achieve escapement goals for all species in the district.
- (7) to maintain a representation of age classes in the escapement similar to the run.

Measures of Success

Sport fishery

- (1) Inriver abundance and catch opportunity.
- (2) Predictably open season.
- (3) Harvest opportunity.

Commercial fishery

- (4) Access to a directed king salmon fishery when a harvestable surplus of king salmon exists.
- (5) Access to available surplus sockeye salmon subject to addressing other concerns, including but not limited to: sustaining the king salmon population, avoiding a line fishery, obtaining escapement throughout the season, attaining allocation goals among

gear groups, and ensuring annual harvest rates do not reach excessively high rates (e.g. >85-90%).

(6) The fishery is kept to the traditional area.

(7) Achieve sustainable escapement goals among salmon stocks in the district.

Subsistence fishery

(8) Reasonable opportunity.

(9) Amounts necessary for subsistence.

(10) Subsistence priority over other uses.

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Appendices

Appendix A – 2023 Stock of Concern Management Plan.

5 AAC 06.391 - Nushagak District King Salmon Stock of Concern Management Plan

(a) The purpose of this management plan is to provide management tools and guidelines to the department for the management of Nushagak District salmon fisheries, while Nushagak River king salmon are listed as a stock of management concern, which will result in the sustained yield of king salmon stocks large enough to meet sustainable escapement goals, while allowing for harvest opportunity in the subsistence, sport, and commercial fisheries.

(b) While the Nushagak River king salmon are listed as a stock of management concern, it is the intent of the board that all Nushagak District salmon stocks are managed conservatively through June 28 to protect Nushagak River king salmon, consistent with 5 AAC 39.222 (policy for the management of sustainable salmon fisheries).

(c) The department shall manage commercial fisheries in the Nushagak District as follows:

(1) to achieve an inriver run goal of 95,000 king salmon in the Nushagak River consistent with the Nushagak-Mulchatna King Salmon Management Plan as described in 5 AAC 06.361(b)(1).

(2) when the Wood River sockeye salmon forecast or in season projection is less than 5,000,000 fish the department shall manage for the current sustainable escapement goal (SEG) of 700,000 to 1,800,000 fish;

(3) when the Wood River sockeye salmon forecast or inseason assessment of run size is greater than five million fish the department shall manage to achieve a Wood River sockeye salmon optimal escapement goal (OEG) of 700,000 fish to an upper bound that is up to 15 percent of the Wood River run size above the 1,800,000 fish upper bound of the SEG, based on the preseason forecast and in season assessment of run size;

(4) when the Nushagak River sockeye salmon forecast or inseason projection is less than 2,500,000 fish, the department shall manage for the current SEG of 370,000 to 900,000 fish;

(5) when the Nushagak River sockeye salmon forecast or inseason assessment of run size is greater than 2,500,000 fish the department shall manage to achieve a Nushagak River sockeye salmon OEG of 370,000 fish to an upper bound that is up to 15 percent of the Nushagak run size above the 900,000 fish upper bound of the SEG, based on the preseason forecast and in season assessment of run size.

(d) Before 9:00 a.m. June 28, if the Nushagak king salmon inriver run size is projected to be less than 95,000 fish, the commissioner shall close, by emergency order, the sockeye salmon commercial drift gillnet fishery in the Nushagak District, and the sockeye salmon commercial set net fishery in the Nushagak Section of the Nushagak

District until

(1) the sockeye salmon sonar estimate in the Nushagak River is projected to exceed six percent of the Nushagak River sockeye salmon run based on the Nushagak River sockeye salmon preseason forecast and inseason assessment of run size; or

(2) the sockeye salmon count past the Wood River counting tower is projected to exceed 10 percent of the Wood River sockeye salmon run size based on the Wood River sockeye salmon preseason forecast and inseason assessment of run size.

(e) The department shall manage the sport fishery in the Nushagak River drainage, excluding the Wood River drainage, as follows:

(1) the annual limit for king salmon 20 inches or greater in length is four fish, of which only one fish may be 28 inches or greater in length;

(2) if the total inriver king salmon run return in the Nushagak River is projected to exceed 95,000 fish, the commissioner may, by emergency order, increase the annual limit for king salmon to four king salmon, 20 inches or greater in length, with no restrictions for fish over 28 inches in length.

(f) Subsistence fisheries will be managed in accordance with the rest of this title.

Notes

5 AAC 06.391

E!. 6/25/2023, Register 246, July 2023

Authority: AS 16.05.060

AS 16.05.251

Appendix B – 2023 Nushagak-Mulchatna King Salmon Management Plan.

5 AAC 06.361 – Nushagak-Mulchatna King Salmon Management Plan

(a) The purpose of this management plan is to ensure biological spawning escapement requirements of king salmon into the Nushagak-Mulchatna river systems. It is the intent of the Alaska Board of Fisheries (board) that Nushagak-Mulchatna king salmon be harvested in the fisheries that have historically harvested them. This management plan provides guidelines to the department to preclude allocation conflicts between the various users of this resource. The department shall manage Nushagak-Mulchatna king salmon stocks in a conservative manner consistent with sustained yield principles and the subsistence priority. Additionally, the department shall manage the Nushagak fisheries for the following management measures:

- (1) to provide consistent sport fishing opportunity within and among seasons, including a level of inriver abundance as a given year's run timing allows, and a predictably open season;
- (2) to provide a directed commercial king salmon fishery when surplus is available;
- (3) to minimize disruptions to the commercial sockeye salmon fishery;
- (4) to provide reasonable opportunity for subsistence harvest of king salmon;
- (5) to ensure the subsistence fishery is the last fishery restricted or closed;
- (6) to achieve escapement goals for all species in the district;
- (7) to maintain a representation of age classes in the escapement similar to the run.

(b) The department shall manage the commercial and sport fisheries in the Nushagak District as follows:

- (1) to achieve an inriver goal of 95,000 king salmon present in the Nushagak River upstream from the department sonar counter; the inriver goal provides for
 - (A) a biological escapement goal of 55,000 - 120,000 fish;
 - (B) reasonable opportunity for subsistence harvest of king salmon; and
 - (C) a king salmon sport fishery guideline harvest level of 5,000 fish, 20 inches or greater in length;

(2) in order to maintain a natural representation of age classes in the escapement, the department shall attempt to schedule commercial openings to provide pulses of fish into the river that have not been subject to harvest by commercial gear;

(3) the department may close the commercial drift or set gillnet fishery if the harvest in the directed commercial king salmon fishery for either gear group is more than two sockeye salmon for every one king salmon;

(4) consistent with [5 AAC 06.367](#) (Nushagak District Commercial Set and Drift Gillnet Sockeye Salmon Fisheries Management and Allocation Plan), to conserve king salmon the department shall manage for sockeye escapements in the Nushagak District to fall within

(A) the lower half of each river's sockeye salmon escapement goal range when the Wood River sockeye salmon run is 5,000,000 fish or less and the Nushagak sockeye salmon run is 2,500,000 fish or less; or

(B) the upper half of each river's sockeye salmon escapement goal range when the Wood River sockeye salmon run is greater than 5,000,000 fish or the Nushagak sockeye salmon run is greater than 2,500,000 fish based on the preseason forecast and inseason assessment of run size;

(5) beginning June 25, the department shall consider when evaluating the total run of sockeye salmon to the Nushagak District all possible data sources including the preseason forecast, Port Moller test fishery indices, including stock and age composition, total catch and effort to date, age composition of catch and effort data, and district test fishing;

(6) from June 1 through June 30, the department shall, in an attempt to conserve king salmon and to the extent practicable, conduct a gillnet test fishery to assess the abundance of sockeye and king salmon before opening by emergency order a fishing period directed at sockeye salmon.

(c) If the total inriver king salmon return in the Nushagak River is projected to exceed 95,000 fish, the guideline harvest level described in (b)(1)(C) of this section does not apply and the department shall consider opening a directed commercial king salmon fishery.

(d) If the spawning escapement of king salmon in the Nushagak River is projected to be more than 55,000 fish and the projected inriver return is less than 95,000 fish, the commissioner

(1) shall close, by emergency order, the directed king salmon commercial fishery in the Nushagak District; during a closure under this paragraph, the use of a commercial gillnet with webbing larger than five and one-half inches in another commercial salmon fishery is prohibited;

(2) repealed 5/31/2019;

(3) repealed 5/31/2019;

(e) If the spawning escapement of king salmon in the Nushagak River is projected to be less than 55,000 fish, the commissioner

(1) shall close, by emergency order, the sockeye salmon commercial fishery in the Nushagak District until the projected sockeye salmon escapement into the Wood River exceeds 100,000 fish;

(2) shall restrict to catch-and-release, by emergency order, the sport fishery directed for king salmon in the Nushagak River and prohibit the use of bait for fishing for all species of fish until the end of the king salmon season specified in [5 AAC 67.020](#) and [5 AAC 67.022\(g\)](#); and

(3) may establish, by emergency order, fishing periods during which the time or area is reduced for the inriver king salmon subsistence fishery in the Nushagak River.

(f) Notwithstanding [5 AAC 06.200](#), in a directed king salmon commercial fishery, the southern boundary of the Nushagak District is a line from an ADF&G regulatory marker located at Etolin Point at 58° 39.37' N. lat., 158° 19.31' W. long., to 58° 33.92' N. lat., 158° 24.94' W. long. to Protection Point at 58° 29.27' N. lat., 158° 41.78' W. long.

(g) During a directed king salmon commercial fishery in the Nushagak District, drift gillnet and set gillnet fishing periods will be of equal length, but do not have to be open concurrently.

Notes

5 AAC 06.361

Eff. 6/19/92, Register 122; am 4/9/95, Register 134; am 5/14/98, Register 146; am 6/3/2001, Register 158; am 7/8/2001, Register 159; am 4/9/2004, Register 170; am 3/30/2007, Register 181; am 4/4/2013, Register 206; am 8/27/2016, Register 219, October 2016; am 5/31/2019, Register 230, May 2019; am 6/25/2023, Register 246, July 2023

Authority: AS 16.05.060

AS 16.05.251

Appendix C – Actual vs hypothetical fishery opening dates and key cumulative escapement estimates, 2023-2025.

Date	Actual (Current Plan)						Hypothetical (Previous Plan)					
	Fishery Announce- ment (Time)		Cumulative Escapement Estimates				Fishery Announce- ment (Time)		Cumulative Escapement Estimates			
			Nushagak River		Wood River				Nushagak River		Wood River	
			King Salmon	Sockeye Salmon	Sockeye Salmon				King Salmon	Sockeye Salmon	Sockeye Salmon	
2023			Start Triggers:	417,000	801,000						100,000	
21-Jun			10,426	31,365	11,682				10,426	31,365	11,682	
22-Jun			10,677	126,504	103,506		AM	PM	10,677	126,504	103,506	
23-Jun			10,698	198,580	192,108				10,698	198,580	192,108	
24-Jun			12,720	261,405	279,564				12,720	261,405	279,564	
25-Jun	9:00	19:00	18,038	517,698	623,370				18,038	517,698	623,370	
26-Jun			18,690	768,872	1,053,426				18,690	768,872	1,053,426	
27-Jun			21,024	887,215	1,378,728				21,024	887,215	1,378,728	
2024			Start Triggers:	210,000	784,000						100,000	
20-Jun			7,209	51,170	88,890		PM		7,209	51,170	88,890	
21-Jun			8,864	72,514	122,220			AM	8,864	72,514	122,220	
22-Jun			8,984	88,347	142,116				8,984	88,347	142,116	
23-Jun			9,723	92,389	153,684				9,723	92,389	153,684	
24-Jun			10,236	93,149	156,852				10,236	93,149	156,852	
25-Jun			10,997	100,524	190,602				10,997	100,524	190,602	
26-Jun	9:00	16:30	12,454	392,765	435,024				12,454	392,765	435,024	
27-Jun			15,248	639,670	913,428				15,248	639,670	913,428	
28-Jun			19,778	795,391	1,485,138				19,778	795,391	1,485,138	
2025			Start Triggers:	635,000	763,000						100,000	
19-Jun			6,529	402,272	83,454		PM		6,529	402,272	83,454	
20-Jun			6,645	457,559	113,382			AM	6,645	457,559	113,382	
21-Jun	12:00		9,766	755,683	308,556				9,766	755,683	308,556	
22-Jun		9:00	15,517	1,227,017	619,752				15,517	1,227,017	619,752	
23-Jun			16,227	1,480,862	797,922				16,227	1,480,862	797,922	

Key:

1. **Shaded cells** represent actual and hypothetical fishery announcement and opening dates for visual reference.
2. **Bolded** escapement estimates represent the best estimate of cumulative passage above the district at the fishery opening time. These were identified by adding assumed travel time (12-24 hours for Wood River and 36-48 hours for Nushagak River stocks) to the fishery opening time.
3. **Outlined** cells represent the escapement that met or exceeded the start trigger for that year and stock, based on the 2023 SOC Management Plan and annual Bristol Bay Salmon Forecast.

Sources: Elison et al. (2024), Elison et al. (2025), Tim Sands, personal communication.

Appendix D - Inshore catch, escapement, total run and harvest rate for sockeye salmon in the Nushagak District, 2007-2025.

Year	Catch	Escapement	Total Run	Harvest Rate
2007	8,404,532	2,461,579	10,866,111	77%
2008	6,903,367	3,271,926	10,175,293	68%
2009	7,731,518	2,317,569	10,049,087	77%
2010	8,424,702	2,818,215	11,242,917	75%
2011	4,887,305	1,968,744	6,856,049	71%
2012	2,663,014	1,392,410	4,055,424	66%
2013	3,163,805	2,466,552	5,630,357	56%
2014	6,447,650	3,723,681	10,171,331	63%
2015	5,593,702	3,389,294	8,982,996	62%
2016	8,886,077	2,459,450	11,345,527	78%
2017	12,322,519	7,705,230	20,027,749	62%
2018	24,230,150	9,525,486	33,755,636	72%
2019	14,755,905	3,038,699	17,794,604	83%
2020	8,860,302	3,795,759	12,656,061	70%
2021	18,283,479	9,986,407	28,269,886	65%
2022	22,718,969	7,581,652	30,300,621	75%
2023	11,967,229	4,963,788	16,931,017	71%
2024	12,300,233	6,820,614	19,120,847	64%
2025	16,596,415	6,585,886	23,182,301	72%
2007 - 2016	6,310,567	2,626,942	8,937,509	69%
2017 - 2019	17,102,858	6,756,472	23,859,330	72%
2023 - 2025	13,621,292	6,123,429	19,744,722	69%

Sources: Elison et al. (2025); ADF&G (2025).

Appendix E – Number of hours per day opened to drift net fishing for selected years.

Date	2017	2018	2019	2023	2024	2025
18-Jun						
19-Jun						
20-Jun		5	1			
21-Jun		5	8.5			
22-Jun	10	4.5	10.5			4
23-Jun	14	5	10			9
24-Jun	17	8.5	10			7.5
25-Jun	24	16	11.5	4		16
26-Jun	24	24	12	8.5	6	7
27-Jun	24	22.5	13	6.5	8	9.5
28-Jun	24	16.5	10	14.5	10	10
29-Jun	19	15	12	10.5	10	14.5
30-Jun	12	16	15.5	10	12	11.5
1-Jul	15	16.5	17	13	11.5	24
2-Jul	14	16.5	16	14.5	9.5	16.5
3-Jul	24	16.5	18.5	8	12.5	14
4-Jul	18	17.5	16.5	17.5	23.5	15
5-Jul	24	17.5	18	24	24	15
6-Jul	24	18	14.5	23	23	15.5
7-Jul	24	17.5	16	15	15.5	16.5
8-Jul	24	21.5	13	19.5	15.5	17
9-Jul	24	21	11	24	19	17.5
10-Jul	24	18	11	24	24	17.5
11-Jul	24	18	11.5	24	24	22.5
12-Jul	24	21	15.5	24	24	24
13-Jul	24	19	16	24	24	24
14-Jul	24	19	16	24	24	24
15-Jul	24	19	16	24	24	24
16-Jul	24	20.5	17.5	24	24	24
17-Jul	24	24	24	24	24	24
18-Jul	24	24	24	24	24	24
19-Jul	24	24	24	24	24	24
20-Jul	24	24	24	24	24	24
Means						
20-Jun - 25-Jun	16.3	7.3	8.6	4.0		9.1
26-Jun - 30-Jun	20.6	18.8	12.5	10.0	9.2	10.5
1-Jul - 5-Jul	19.0	16.9	17.2	15.4	16.2	16.9
6-Jul - 10-Jul	24.0	19.2	13.1	21.1	19.4	16.8

Sources: Elison et al. (2018), Salomone et al. (2019), Tiernan et al. (2021), Elison et al. (2024), Elison et al. (2025), Tim Sands, personal communication.

Appendix F – Number of hours per day opened to set net fishing for selected years.

Date	2017	2018	2019	2023	2024	2025
18-Jun						
19-Jun		6				
20-Jun		18.25	8.5			
21-Jun	1.5	18	19.5			
22-Jun	19.5	17.5	19.5			8
23-Jun	24	17.75	13			11
24-Jun	24	17	24			10
25-Jun	24	24	24	5		20
26-Jun	24	24	24	13	7.5	8.5
27-Jun	24	24	24	9	11	13.5
28-Jun	24	24	24	16	12.5	13.5
29-Jun	24	24	24	17	12	20.5
30-Jun	24	24	24	13	14	14
1-Jul	24	24	24	19	14	24
2-Jul	24	24	24	24	15	17.5
3-Jul	24	24	24	11	18	19
4-Jul	14	24	24	23	24	24
5-Jul	24	24	24	24	24	24
6-Jul	24	24	24	24	24	24
7-Jul	24	24	24	24	24	24
8-Jul	24	24	24	24	24	24
9-Jul	24	24	24	24	24	24
10-Jul	24	24	24	24	24	24
11-Jul	24	24	24	24	24	24
12-Jul	24	24	24	24	24	24
13-Jul	24	24	24	24	24	24
14-Jul	24	24	24	24	24	24
15-Jul	24	24	24	24	24	24
16-Jul	24	24	24	24	24	24
17-Jul	24	24	24	24	24	24
18-Jul	24	24	24	24	24	24
19-Jul	24	24	24	24	24	24
20-Jul	24	24	24	24	24	24
Means						
20-Jun - 25-Jun	18.6	18.8	18.1	5.0		12.3
26-Jun - 30-Jun	24.0	24.0	24.0	13.6	11.4	14.0
1-Jul - 5-Jul	22.0	24.0	24.0	20.2	19.0	21.7
6-Jul - 10-Jul	24.0	24.0	24.0	24.0	24.0	24.0

Sources: Elison et al. (2018), Salomone et al. (2019), Tiernan et al. (2021), Elison et al. (2024), Elison et al. (2025), Tim Sands, personal communication.

Appendix G – Comparison of Actual Vs. Hypothetical management objectives under the New SOC Management Plan vs. the old NMKS Management Plan (All Numbers are in Millions of Sockeye).

		Wood River			Nushagak River			Combined (Wood & Nushagak)			
		2023	2024	2025	2023	2024	2025	2023	2024	2025	Ave. 23-25
Hypothetical (Managed under old plan)	Fishing Start Date							22-Jun	21-Jun	20-Jun	21-Jun
	Fish past District at Start of Fishing	0.19	0.12	0.11	0.26	0.09	0.76	0.45	0.21	0.87	0.51
	Season Total Escapement ¹	1.8	1.8	1.8	0.9	0.9	0.9	2.70	2.70	2.70	2.70
	Escapement after Start of Fishing ²	1.61	1.68	1.69	0.64	0.81	0.15	2.25	2.49	1.83	2.19
Actual (Managed under SOC plan)	Fishing Start Date							25-Jun	26-Jun	22-Jun	24-Jun
	Fish past District at Start of Fishing	1.05	0.91	0.62	0.89	0.80	1.48	1.94	1.71	2.10	1.92
	Season Total Escapement	2.649	4.405	2.657	1.773	1.723	3.261	4.42	6.13	5.92	5.49
	Escapement after Start of Fishing ²	1.60	3.49	2.04	0.89	0.93	1.78	2.48	4.42	3.82	3.57
Comparison (Managed under Old Plan Vs. SOC Management Plan)	Difference In Start Date (Delay)							-3 days	-5 days	-2 days	-3.3 days
	Additional Sockeye Esc. due to Triggers ³	0.86	0.79	0.51	0.63	0.71	0.73	1.49	1.50	1.23	1.41
	Additional Sockeye Esc. After Start of Fishing ⁴	(0.01)	1.81	0.35	0.25	0.12	1.64	0.23	1.93	1.99	1.38
	Total Extra Sockeye Escapement ⁵	0.85	2.61	0.86	0.87	0.82	2.36	1.72	3.43	3.22	2.79
	% of Additional Esc. Resulting from Triggers ⁶	101%	30%	59%	72%	86%	31%	86%	44%	38%	56%
	% of Additional Esc. Resulting from Late Season ⁷	-1%	70%	41%	28%	14%	69%	14%	56%	62%	44%

¹ For the Hypothetical Scenario the top end of the SEG was used as the escapement number as to assume the manager hit the objectives of the plan of meeting the escapement goal.

² Escapement after start of fishing represents the total escapement minus the fish past the district when fishing started.

³ This is the difference in the fish past the district between the actual start date using the SOC plan and the hypothetical start date under the old management plan.

⁴ Difference between Escapement after start of fishing from the actual fishery managed under the SOC management plan and the hypothetical escapement after start of fishing if the fishery had been managed according to the old plan and stayed within the top end of the SEG.

⁵ This is the total sockeye escapement that went above the top end of the SEG.

⁶ This represents the percent of additional sockeye escapement above the SEG that likely was a result of the delayed start to fishing due to the Triggers in the SOC Management Plan. It was calculated by dividing the additional sockeye due to triggers by the total extra sockeye escapement.

⁷ This represents the percent of additional sockeye escapement above the SEG that likely was a result of management actions taken after the commercial fishery was open. It was calculated by dividing the additional sockeye esc. after start of fishing by the total extra sockeye escapement.

NOTE: it is important to recognize that this analysis rests on several assumptions. First, we likely overestimated the conservation benefits of the start triggers. If the fishery had opened earlier, not all of the fish estimated to have passed would have been harvested, since harvest rates are always less than 100 percent; some portion of those fish would have escaped upriver regardless. At the same time, the analysis also assumes that under the old management plan scenario, managers could have held escapements within the SEG targets. If that had not been possible, then we likely overestimated the conservation benefits attributed to later-season closure periods.

PC33

Submitted by: Luke Brockmann

Community of Residence: Juneau, ak

i am writing in support of this proposition. disrupts of a fish's natural feeding habits is something that should not be allowed. i think anyone can see, this is a gross violation of any sort of "fair chase". it has the potential to negatively impact native fish populations by attracting them to areas they otherwise would not frequent for food. this practice is very un-sportsman like and i feel should be outright banned. this, i believe, is a excellent first step to help keep wild fish wild.

PC33

Submitted by: Luke Brockmann

Community of Residence: Juneau, ak

i am writing in support of this proposal. because this fishery is primarily catch and release, i feel this proposal makes complete sense. there is an overwhelming amount of evidence showing that barbless hooks cause less damage to fish than barbed hooks. i feel this proposal will help ensure the health and longevity of the fisheries its applied to.

PC34

Submitted by: Jon Broderick

Community of Residence: Cannon Beach OR

I am a Nushagak setnetter opposed to Proposition 60 which would increase the legal limit of setnets in the Wood River Special Harvest Area from 25 fathoms to 37.5 fathoms.

The WRSWA is small. The proposal favors those who secure the first several sites at the WRSWA line, which are already the most successful and it disfavors the many setnetters behind these.

I also oppose proposals that would interrupt the current Nushagak King Salmon Stock of Concern Management Plan before completing seven years of implementation across a full generation of King salmon runs. It might be working fine.

PC35

Submitted by: Bradley Brophy

Community of Residence: Nevada

Hi, my name is Brad. My family has been fishing in Bristol Bay for nearly 20 years. I would personally like to strongly oppose proposals 61 - 68. Taking control out of the hands of the biologists and using an arbitrary date is dangerous to the fishery and would have huge economic impacts on the Bristol Bay fleet.

PC36

Submitted by: Dawn Brophy

Community of Residence: Nevada

Hi, my name is Dawn. I would like to oppose proposals 61 - 68. Lets see the current management plan go through a full cycle before we adopt extreme measures that would have great economic impacts on not only Nushagak fisherman but the entire Bristol Bay fleet.

PC37

Submitted by: Samuel Brophy

Community of Residence: Naknek

As a long time Bristol Bay fisherman(more specifically Nushigak fisherman), I strongly oppose proposal 61 as it has severe negative impact on myself and all other Bristol Bay fisherman who rely on this fishery to make a living for themselves and their families. I have complete trust in our biologists to manage this fishery properly, and this proposal takes it out of the biologists hands completely, and could cause severe negative impact to the future of the sockeye salmon run in the Nushigak district.

PC38

Submitted by: Zachary Brophy

Community of Residence: Washington

As a long time Bristol Bay fisherman and vessel owner. I would like to oppose propositions 61-68. Proposition 61 specifically limits valuable fishing time in the Nushagak district with little to no scientific backing. We have already seen substantial king salmon management changes go into affect and we need to allow enough time to see the outcome. This also puts the Nushagak district at risk and provides limited ability to manage the escapement during the early part of the season, I trust the biologists discretion in management of the district. I feel that this could also cause an imbalance of boat counts throughout the bay and have negative impacts on other districts.

PC39

Submitted by: Corey Brost

Community of Residence: Spearfish

Bristol Bay Fisherman For 45 years. Oppose Proposals 44, 61-68 These proposals would substantially restructure the Management Plan before it has been in place long enough to evaluate over a full Chinook generation. Changing the structure of the plan now would reset the clock, undermine one of the most thorough stakeholder processes the Board of Fisheries has ever directed and reduce management flexibility.

PC39

Submitted by: Corey Brost

Community of Residence: Spearfish SD

In Favor.

Submitted by: Rhett Buchanan

Community of Residence: Wasilla, Alaska

I'm writing in support of Proposal 48. As a long-time drift boat deckhand, I witnessed how set net site gear interferes with a drift boat's ability to effectively fish near shore, which this proposal addresses in a way that would benefit drift gillnet boats. As a current Kvichak set net permit holder, I appreciate how this proposal would equitably provide proportional harvest opportunities for both gear groups. Note: If Proposal 48 is not passed, I would then support Proposal 49.

Submitted by: Robert Buchmayr

Community of Residence: Shoreline, wa

Proposal 57

I am against this proposal for the following reason:

Every drift boat fishing always avoids set net gear as it is, getting entangled with a set net has serious consequences for the drift boat in lost fishing time, lost gear and possible danger to crew. There is no need for new regulations to prevent this, current regulations and the penalty of lost fishing time and gear are enough of a deterrent. I also am against the wording of not fishing shoreward of any bouy , current regulations specify the distance from a set net, which makes sense, many time there are no set nets fishing but the bouys are still out, usually for the entire season whether the site is being fished or not. I believe current regulations are specific enough to separate set nets from drift boats and allow harvesting opportunities for both groups. The penalty for a drift boat that gets entangled with a set net anchor can ran into the thousands of dollars in missed opportunities, for that alone every drift boat does everything they can to not get entangled.

Submitted by: Robert Buchmayr

Community of Residence: Shoreline

I am in opposition to any changes in the stock of concern plan at this time

If changes are made they must be conservation efforts across user groups not isolated users

The plan has only been in place one board cycle which is an insufficient amount of time to gauge true long term benefit when a chinook life cycle is 7 years so I'm advocating for no changes so is the AC and BBSRI

Submitted by: Marion Burgraff

Community of Residence: King salmon

I appose the date changes of this proposal we will over escape the sockeye runs that late of a season start will force boat out of the district. I for one do not catch kings in my small drift gear. A few Jack'king salmon the sport fisheries impact the run more the drift fleet.

Submitted by: Spencer Burnfield

Community of Residence: Soldotna, Ak

Prop 61:

I oppose this proposal. There has not been time in the life cycle of king salmon to see any practical effects of the original proposal that was adopted in 2022. Looking at the data on commercial catch of kings before and after the proposal took effect there has been a measurable drop in the percentage of kings caught by commercial fishermen in the district. Whether that drop is significant or not is debatable, but the current data does show a decline which shows there has been some positive effects of the new regulations already. Furthermore we are, on average, quite close to the old bottom end minimum escapement over recent years. Which shows that at some point in the established science it was thought probable that king salmon stocks could decline to the current level. Upping the lower end escapement to it's current mark makes the decline look more stark. I'm not saying it isn't a concern. But sometimes helping one species can be detrimental to another. We are helping kings under the current plan. Let's not do too much too soon before we know if what we are currently doing is effective.

Prop 62:

I oppose this proposal. There has not been time in the life cycle of king salmon to see any practical effects of the original proposal that was adopted in 2022. Looking at the data on commercial catch of kings before and after the proposal took effect there has been a measurable drop in the percentage of kings caught by commercial fishermen in the district. Whether that drop is significant or not is debatable, but the current data does show a decline which shows there has been some positive effects of the new regulations already. Furthermore we are, on average, quite close to the old bottom end minimum escapement over recent years. Which shows that at some point in the established science it was thought probable that king salmon stocks could decline to the current level. Upping the lower end escapement to it's current mark makes the decline look more stark. I'm not saying it isn't a concern. But sometimes helping one species can be detrimental to another. We are helping kings under the current plan. Let's not do too much too soon before we know if what we are currently doing is effective.

Submitted by: Colton Campitelli

Community of Residence: Alaska

To whom it may concern. I am a bristol bay fisherman and would like to strongly oppose proposals 61-68. Proposal 61 setting a specific date for Nushagak fishing start date for the drift fleet takes all control of the fishery out of the biologists hands and puts it into a proposal submitted with no evidence that it will work. The negative financial impacts this would have on myself and fellow fisherman and all of families would be a great price to pay for a very low probability roll of the dice.

CANFISCO GROUP USA

A Division of the Jim Pattison Group

December 29, 2025

Ms. Märit Carlson-Van Dort
Alaska Board of Fisheries
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526

RE: Canfisco Group Comments on Proposals 61-62, 92, & 94

Dear Chair Carlson-Van Dort and Board of Fisheries Members,

The Canfisco Group comprises several seafood processing companies united by common ownership and purpose. Our group operates 11 seafood processing plants in Bristol Bay, Kenai, Kodiak, Yakutat, Sitka, and Ketchikan, employing 3,500 workers and supporting 1,750 fishermen each year. Our Bristol Bay operations include Alaska General Seafoods in Naknek, E&E Foods in Egigek, North Pacific Seafoods in Togiak and Naknek, and Leader Creek Fisheries in Naknek.

Proposals 61 and 62, Canfisco Group is opposed to setting a fixed date and Chinook salmon abundance trigger for management of the commercial fishery in the Nushagak District, and limiting the number of hours for the commercial fishery to no more than 12 hours per day from June 28 through July 4. We support retaining the current *Nushagak District King Salmon Stock of Concern Management Plan* given its success in reducing commercial exploitation of Chinook salmon and achieving additional Chinook escapement.

Staff comments show the exploitation rate of Chinook salmon by the commercial fleet decreased to 10% in the years of the SOC Management Plan, compared to 23% prior to 2023¹. Further, population indicators and Table 1 from the ADF&G Nushagak River Chinook Salmon Stock Status report show that the average commercial harvest of Chinook in the last three years of the management plan decreased by 86% compared to the 20-average from 2003-2022².

Table 61-2 from page 14 of staff comments highlights ADF&G's conservative management under the SOC Management Plan each year, they opted to open the district 2-5 days later than the plan would have allowed by waiting until the Nushagak River trigger was met, despite the plan allowing ADF&G to open the district when the Nushagak and Wood River triggers are *projected* to be met. Further, it shows this cautious management passed 7,982 to 11,190 additional Chinook per year than the SOC Management Plan would have achieved. This amount of leeway for managers is appropriate as the SOC Management Plan was intended to provide the flexibility to manage Nushagak district salmon fisheries for the sustained yield of Chinook salmon stocks while allowing harvest opportunities for sockeye.

¹ ADF&G (Alaska Department of Fish and Game). 2025. Alaska Department of Fish and Game staff comments on commercial, personal use, sport, and subsistence regulatory proposals, Committee of the Whole-Groups 1-4 for Bristol Bay finfish, Alaska Board of Fisheries meeting, Anchorage, Alaska, January 13-18, 2026. Alaska Department of Fish and Game, Regional Information Report No. 5J25-05, Anchorage.

² Sands, T., C. Weaver, L. Borden, and L. Sills. 2025. Nushagak River Chinook salmon stock status 2023-2025: A report to the Alaska Board of Fisheries. Alaska Department of Fish and Game, Special Publication No. 25-18, Anchorage.



CANFISCO GROUP USA

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Table 61-2.—Actual versus hypothetical, based on the previous regulatory structure, fishery opening dates, and associated salmon passage.

Year	Actual Opening Date	Hypothetical Opening Date	# Days Difference	Additional Salmon Passage			
				Nushagak King Salmon	Nushagak Sockeye Salmon ^a	Wood River Sockeye Salmon ^b	Sockeye Salmon Harvest ^c
2023	25-Jun	22-Jun	-3	10,230	688,490	949,920	1,573,042
2024	26-Jun	21-Jun	-5	11,190	705,740	791,208	612,460
2025	22-Jun	20-Jun	-2	7,982	843,154	684,540	3,594,550

^a Additional salmon passage in the Nushagak River includes a 2-day lag to account for fish between the fishing district and sonar site.

^b Additional salmon passage in the Wood River includes a 1-day lag to account for fish between the fishing district and counting tower.

^c Harvest from actual opening date through midnight June 27. Does not include earlier Igushik River set net harvest.

Management further errs on the side of conservation in their Chinook escapement counts due to the inability for the sonar to accurately account for Chinook in-river. ADF&G's hydroacoustic study from 2011 to 2014 estimated 47–65% of the Chinook salmon passed outside the ensonified zone³. And ADF&G's tagging mark and recapture study documented that in some years, 20–60% of Chinook salmon in the Nushagak River were not enumerated by the sonar⁴. The inability to account for all Chinook escapement is exacerbated in times of large sockeye runs, as seen in the last three years, as large schools of sockeye salmon passing in front of the sonar produces a 'shadowing' effect for the sonar.

When approved by the Board, the *Nushagak District King Salmon Stock of Concern Management Plan*, was intended to remain in effect until the Board undesignates the Stock of Concern. The management plan was not designed to rebuild Chinook stocks within one BOF regulatory cycle, given the 4-7-year lifecycle of Chinook salmon; rather, it is meant to reduce harvest pressure during periods of lower productivity. Changing the SOC Management Plan now, short of one or more Chinook salmon lifecycle, would create regulatory instability for those invested in the fishery and undermine the management success of the last three years.

In summary, the SOC Management Plan has delayed fishery openings, reduced fishing time, and increased Chinook and sockeye escapement. We ask you allow the SOC Management Plan to remain unchanged for an additional BOF regulatory cycle.

Proposal 92, Canfisco Group opposes closing the Naknek-Kvichak District on July 25th. Our operations usually stop buying fish on July 29th or later. We purchased fish as late in the year as we can, and the decision to stop buying is generally forced by vessels exiting the fishery. This early closure would result in lost opportunity for fishermen, processors, and the communities that depend on tax revenue.

³ Alaska Department of Fish and Game staff comments on commercial, personal use, sport, and subsistence regulatory proposals

⁴ Nushagak River Chinook salmon stock status 2023-2025



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Proposal 94, we support removing the 48-hour maximum extension time for Togiak River Section management after July 16th. ADF&G comments note that controlling escapement has been difficult in recent years due to the current size of the fleet, which has been reduced from 44 permits in 2019 to 23 permits. Appendix A1 from ADF&G's 2024 Bristol Bay Annual Management Report shows 20 years of sockeye escapement by river system. Over the past 20 years, the lower bound of the Togiak River SEG has been met every year, and the upper bound of the goal has been exceeded in 5 of the last 6 years (2019-2024)⁵.

Thank you for the opportunity to comment, we are happy to answer any questions.

Respectfully,



Megan O'Neil
Director of Government Affairs
Petersburg, Alaska

⁵ Elison, T., A. Tiernan, T. Sands, S. Vega, C. Weaver, and J. Terry-Shindelman. 2025. 2024 Bristol Bay annual management report. Alaska Department of Fish and Game, Fishery Management Report No. 25-17, Anchorage.



Submitted by: Alec Capps

Community of Residence: Oregon

Dear Board,

I have been Commercial Gillnetting (Setnet) in the Kvichak district for the last 7 years, 5 years as an owner/operator. I recognize that I am a visitor in this place (we live in Oregon). While we rely largely on the financial success of our business commercial fishing in Alaska, we also want to prioritize the people who call it home, and the future of the fishing industry for our children, should they choose to fish it. My family is greatly appreciative of the work you do.

Submitted by: Mark F. Carr

Ekuk Beach Fishermans Association

Community of Residence: Anchorage, Alaska

Alaska Board of Fisheries – Bristol Bay Finfish Meeting

To Whom It May Concern:

My name is Mark F. Carr, PhD and I am a fisherman on the Ekuk Beach in the Nushagak District. I have been doing this with my sister and her family for about 45 years, having held a permit and simply being a crew member. My own parents also owned and operated a setnet site on the Ekuk beach. I submit this comment as a member of the Ekuk Beach Fishermen's Association (EBFA) and as someone whose livelihood and family depend on a safe, fair, and sustainable Bristol Bay fishery. Please consider my following concerns:

1. Allow the Nushagak Chinook Management Plan to Complete a Full Life Cycle

I support allowing the Nushagak Chinook Management Plan to work without preemptive alterations. Chinook are long-lived fish with a life cycle of seven years, and meaningful evaluation of conservation outcomes requires time and consistency. This plan was developed through a multi-year, Board-convened stakeholder process and adopted unanimously in 2023. Re-setting management in the middle of the Chinook life cycle creates instability for fishing families and undermines the ability to evaluate whether the plan is working.

2. Support for Proposal 56: Predictable Spatial Boundaries

I support Proposal 56, which would make Ekuk's coordinate-based offshore set-net boundary permanent. Adopted by the Board in 2022, this boundary has been working successfully as a clear, predictable, and enforceable seaward limit. Making it permanent provides certainty for set-net placement, drift operations, and enforcement in a high-density fishing area.

3. Support for Proposal 57: Orderly and Safe Fishing

I support Proposal 57, which establishes the same boundary as a shoreward limit for drift gear and prohibits contact with set-net gear. This proposal reduces entanglement risk, gear loss, and unsafe nearshore interactions by clearly defining spatial limits and updating set-net gear definitions. As the drift fleet has grown significantly in size and horsepower, these clear, enforceable rules are essential to

maintaining an orderly and safe fishery. Every summer, literally every summer, while working our gear or just being on the beach, we watch drifters come within maybe ten feet of the shoreline, well inside our gear, while they set their own gear or just want to see if we're catching anything. Countless times over these 45 years we've seen our own and others' running lines cut by these Cretons. Please do something about it.

4. Support for Proposal 80: Joint-Venture Set-Net Operations

I support Proposal 80, which allows limited joint-venture set-net operations under defined conditions. Joint ventures help small, family-based sites adapt to short openings, rising costs, and safety challenges without increasing fishing footprint or promoting consolidation. This approach has worked successfully in Kodiak set-net fisheries for over four decades.

5. Economic and Community Impacts of Missed Allocation

In recent years, set-net fishermen in the Nushagak District have consistently fallen far short of the Board-adopted 26% set-net allocation. These shortfalls, in harvest share and time, have real consequences for fishing families, local processing, and watershed communities like Ekuk. When allocation exists on paper but is not achieved in practice year after year, the economic and social fabric of Bristol Bay communities is weakened. From my perspective, this is a result of the now politicized reality facing our Fish & Game Biologist whose expertise, knowledge, and experience is overridden by some politician or political assignee from Juneau who doesn't know what he/she is doing. Please stop this.

Together, these requests are important steps toward equitable harvest share in practice, not just on paper. Allowing the Chinook Management Plan to complete at least a full life cycle before considering alterations to the plan encourages participation and trust in conservation management; Proposals 56 and 57 reduce conflict and safety risks that disproportionately impact onshore set-net fishermen; and Proposal 80 provides limited flexibility for small operations to adapt to shortened and more complex fishing opportunities. These measures help ensure that set-net fishermen in the Nushagak District have a fairer opportunity to sustain our fishing families and watershed communities over the long term.

Thank you for your consideration and for your service to Alaska's fisheries and fishing communities.

Respectfully submitted,

Mark F. Carr, PhD

Ekuk Beach, Nushagak District

PC48

Submitted by: Mike Carr

Community of Residence: Port Townsend, WA

Mike Carr, Bristol Bay drift fisherman and boat designer.

I oppose Proposals 61 and 62.

Reason: The triggers in the Nushagak king salmon management plan that is currently in place are for good reason and should not be discarded.

I support proposal 64.

Reason: Increased fishing opportunity in the Wood River Special Harvest Area should be considered while the greater Nushagak district is closed for king salmon escapement.

I oppose proposal 69.

Reason: It is redundant. The Nushagak district is already managed conservatively up to and passed the 28th of June.

I support proposals 75 and 76.

Reason: Allowing Dual permits vessels has been a benefit to those engaged in the Bristol Bay fishery, and allowing permit stacking would free up a regulatory obstacle to this beneficial practice.

I oppose proposal 81.

Reason: combining two permits permanently would have no benefits over allowing permit stacking and would cause economic obstacles that need not exist.

I Support Proposal 82.

Reason: The vessel specifications as they are written leave a huge amount of room for interpretation and is in need of clarification. Proposal 82 addresses this in a clear way while accommodating vessels that were built to a reasonable interpretation of the currant rules.

I support proposal 83.

Reason: Current conditions in the fishery make a longer vessel more beneficial than ever to fishermen. If longer vessels were allowed, new vessels could be built more cost effectively. This would contribute to better safety, better efficiency, and a better quality product.

**Comments on Subsistence, Commercial, and Sport proposals for Bristol Bay
Finfish Alaska Board of Fisheries Meeting, Anchorage Alaska January 13, 2026**

Personal Comments Submitted by: Katherine Carscallen
December 29, 2025

Dear Board of Fisheries Members,

I am a lifelong resident of Dillingham, Alaska, a lifelong subsistence fisherman, 25 year commercial drift fisherman, S03T permit holder and captain, and a sportfish hobby fisherman as well. I am writing to provide personal testimony on several proposals before the board which would directly affect myself, my family and community. This will be the first Bristol Bay Board of Fisheries cycle I am not able to attend since my first in 2009. I very much believe in and appreciate the opportunity for the public to participate in this process and I hope you are able to consider my comments in your deliberation on the proposals below.

Proposal 44: [Reporting requirements. Limit the number of king salmon retained as homepack in the commercial fishery and in the subsistence fishery] submitted by Kent Anderson, owner Alaska Salmon Camp Inc.

I am adamantly opposed to this proposal. Beyond simply implementing reporting requirements which are duplicative of existing practice, it proposes to limit subsistence catches of King salmon which should be prioritized over all other uses. Currently the Nushagak District is operating under a King Salmon Stock of Concern Management Plan. This plan was the result of collaboration between stakeholder groups, the State of Alaska, local AC's and science and research entities. To make piecemeal changes to the plan targeting certain user groups will not help identify or solve issues with King Salmon stocks and instead only increase animosity between user groups

Please take no action or oppose Proposal 44.

Proposal 61 [Nushagak District King Salmon Stock of Concern Management Plan...] Proposed by KRSA

I am opposed to this proposal. With insufficient time to evaluate the impact of the King Salmon Stock of Concern Management plan, making piecemeal changes to the plan targeting a specific user group are not warranted.

Please take no action or oppose proposal 61.

Proposal 62 [Nushagak District King Salmon Stock of Concern Management Plan...]

Proposed by: Kent Anderson, owner Alaska Salmon Camp Inc

I am opposed to this proposal. This proposal would create an inflexible start date for the commercial fishery and ignores the collaboration and effort put into the existing SOC Management Plan.

Please take no action or oppose proposal 62.

Proposal 63 [Nushagak District King Salmon Stock of Concern Management Plan...]

Proposed by: Nicholas Dowie and John O'Connor.

I am opposed to the adoption of this proposal. As stated regarding proposals 61 & 62 I believe piecemeal adaptations to the SOC Management Plan before adequate time is given to view impacts as well as explore other potential causes and explanations for the King Salmon decline are not advisable.

Please take no action or oppose Proposal 62.

Proposals 63-68 [Nushagak District King Salmon SOC Management Plan...]

Although I appreciate that there are some thoughtful solutions and ideas presented within some of these proposals, I believe it is necessary to allow the SOC management plan time to work. Please take no action on proposals 63-68.

General comments on Proposals 61-68 and 44: When considering proposed changes to the Nushagak King Salmon Stock of Concern Management Plan please consider the context of this plan and the problem as a whole. The plan was developed with collaboration between Bristol Bay's residents, representatives from stakeholder groups, the State of Alaska, local AC's and science and research entities. The plan was also developed with a recognition that impacts to king salmon from commercial harvest, subsistence or sport are not the lone causes of declines in king returns but with an effort to reach a balanced approach to reduce king harvest in the Nushagak as much as possible. I request that the board take no action on proposed changes in order to give the current plan time to work while also doing all you can to encourage an increase in research and analysis to determine the root cause or causes of Nushagak's king salmon decline. If we are forced to compartmentalize solutions for a problem that is no doubt interconnected, and definitely outside of the scope of the Bristol Bay management's reach we have little hope to solve the actual problems. The current SOC Management Plan represents compromises and a concerted effort to address the

problem within the scope of Bristol Bay's boundaries. I support that effort but with the knowledge that the impacts to Nushagak Kings extends beyond Bristol Bay's borders I would request that the Board write a letter to the Alaska Legislature acknowledging its own limitations to solve this problem and requesting increased and collaborative effort to better identify the full scope of impacts and causes of decline.

Proposal 54 [Nushagak River Coho Salmon Management Plan. Repeal the Nushagak River Coho Salmon Management Plan...]

I am opposed to this proposal as written as it incorrectly implies that the commercial coho salmon fishery has declined to the point of irrelevancy and states that "the department will not provide directed commercial fishing opportunities on Nushagak River coho salmon." At the outset this proposal appears to be a housekeeping style proposal seeking to align management with its own funding realities; however the final paragraph in the proposal amounts to a complete attack on an active and important fishery in the Nushagak District.

I have commercially harvested coho in the Nushagak district almost every other year for most of my 25 year fishing career. As a younger fisherman the coho fishery was a chance to keep fishing after the regular season, earn a higher crewshare as the only deckhand on board, take on more responsibilities and learn the fishery with lower stakes than the sockeye season. As a captain for the past 15 years the fishery has provided me the opportunity to pad light seasons with an extra two weeks of fishing on top of an already completed sockeye season. It's offered opportunities for my crew to gain experience, earn a higher crew share, and extend a short Bristol Bay season out longer. Late season coho fishing provides opportunities for families to introduce younger deckhands to the trade with lower risk and provides valuable direct marketing opportunities regardless of processor participation.

Participants in the coho fishery generally live in the watershed or may not have other employment to hurry back to, making it that much more important as a fishing opportunity. The implication from ADF&G that because the majority of processors cease buying the fishery is no longer important is absolutely false. I harvested and sold coho in the Nushagak in 2024 and almost every other year going back as far as I can remember. The years I didn't fish were often due to the plan for management sounding unclear causing processors/buyers to leave. Every year with or without processors however the coho fishery offers opportunity for direct marketers to catch and distribute coho on their own.

It is true that having an escapement goal without counting to accurately assess how those goals are tracking does present a problem, however there is not a biological concern. While funding is tight I would ask the board to consider the lost revenue (tax, fishing earnings, industry support dollars, secondary and tertiary economic impact) to the state and local communities by not managing the fishery as intended (MSY) and how that impact stacks up to continuing an already in-place counting operation two additional weeks.

Please take no action or oppose Proposal 54.

Proposal 55 [Nushagak River Coho Salmon Management Plan. Repeal the Nushagak River Coho Salmon Management Plan...]

I am *more* in favor of this proposal over 54, however my objection remains to any implication that the coho fishery is irrelevant just because effort has decreased in recent years. I do support the concept of removing a target number if we are not counting to reach that target however of course a preferred solution would be to extend the sonar through the peak of the coho run. Even without these counts, ADF&G has clarified that they can and will manage the subsistence, sport, and commercial fisheries effectively in the absence of escapement goals and the management plan.

Please support Proposal 55 as written and take care to ensure the intent of this proposal as a housekeeping measure only is honored throughout the proposal process.

Proposal 71, Proposal 72, Proposal 73 & Proposal 74 [Re-establish a General District ...] Proposed by: Joel A Ludwig, David Vardy, George Wilson and Doug Morgan

I am opposed to this proposal. The solution to fishermen breaking existing rules should not be to liberalize the rules. I agree with the proposers' complaint that the lack of enforcement leads to a situation at the lines which rewards illegal fishing. The solution to that is not to get rid of the line, it is enforcement of the line.

Please take no action or oppose Proposals 71-74

While I oppose the proposal to recreate a General District, I completely agree with the proposers' conclusion that the lack of enforcement late season makes it difficult to fish some areas while competing with illegal fishing. With dramatic improvements in technology in recent years I would urge the board to consider making a recommendation to expand options for enforcement which allow for steady and visible enforcement of the lines. Infrequent enforcement or sting operations actually continue to

reward illegal fishing further and punishes those of us who will not fish outside the boundaries. Consistent monitoring of the line through less expensive methods would restore a legal, competitive fishing boundary.

Proposal 75, Proposal 76, Proposal 77 & Proposal 78 [Allow permit stacking in the Bristol Bay commercial salmon drift gillnet fishery...] Proposed by Justin Arnold, Abe Williams, Glenn Biernacki and Hayden Hinschied.

I am opposed to Proposal 75. The proposer mentions the benefits and increased entry into the fishery created by the current dual permit structure. The current structure allows for a deckhand to purchase a permit and partner with a vessel owner which has increased entrance into the fishery and created opportunities for deckhands. If the vessel owner was able to simply purchase a permit and stack on their own there would be less incentive to pay the higher crewshare currently earned by their deckhand. It would eliminate the mentorship opportunities created by the current dual system and result in a consolidation of permits into fewer vessel owners and create the ability to 'buy' a larger share of access to the fishery.

This issue has been thoroughly debated by past boards for two decades. The decision made with input from fleet and community members has been the correct one. Please uphold that decision and take no action or Oppose Proposals 75-78.

PC50

Submitted by: Floyd Carter

Togiak River Lodge

Community of Residence: Togiak

I support Proposal 102. The bulk of king salmon spawning on the Togiak occurs above the Pongo, and no lodges operate above that point. Moving the boundary to the Pongo is logical and will help streamline enforcement from Troopers”

PC51

Submitted by: Christopher Childs

Community of Residence: Maupin,OR

“I support Proposal 102. The bulk of king salmon spawning on the Togiak occurs above the Pongo, and no lodges operate above that point. Moving the boundary to the Pongo is logical and will help streamline enforcement from Troopers”

PC52

Submitted by: Jace Clayton

Community of Residence: Pahrump Nv

I oppose 61 through 68 because I think we should trust our biologists about our river and not some arbitrary regulations.

PC53

Submitted by: Jaxon Clayton

Community of Residence: Alaska

Hi, my name is Jaxon. I am a bristol bay vessel owner and permit holder. I am a Nushagak fisherman and I would like to strongly opposed proposal 61-68. Proposal 61 takes the decision making on the management of the river out of the biologists hands whom I trust to make the correct decisions for the longevity of the salmon runs. This would have great negative economic impacts on myself, my family and my fellow fisherman.

CFEC Permit Holdings and Estimates of Gross Earnings in the Bristol Bay Commercial Salmon Fisheries, 1975-2024

CFEC Report Number 25-07N,
December, 2025

Commercial Fisheries Entry Commission
8800 Glacier Highway #109
P.O. Box 110302
Juneau, Alaska 99811-0302
(907) 789-6160

OEO/ADA Compliance Statement

The Commission is administratively attached to the Alaska Department of Fish and Game.

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If you believe you have been discriminated against in any program, activity, or facility please write:

- ADF&G ADA Coordinator, P.O. Box 115526, Juneau, AK 99811-5526
- U.S. Fish and Wildlife Service, 4401 N. Fairfax Drive, MS 2042, Arlington, VA 22203
- Office of Equal Opportunity, U.S. Department of the Interior, 1849 C Street NW, MS 5230, Washington DC 20240.

The department's ADA Coordinator can be reached via phone at the following numbers:

- (VOICE) 907-465-6077
- (Statewide Telecommunication Device for the Deaf) 1-800-478-3648
- (Juneau TDD) 907-465-3646
- (FAX) 907-465-6078

For information on alternative formats and questions on this publication, please contact the following:

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Research Section

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Abstract

Limited entry permit holdings in both Bristol Bay salmon fisheries are examined in this report, beginning with the drift gillnet fishery and followed by a separate review of the set gillnet fishery. The report provides summary statistics on permit holdings; permanent and emergency transfers; permit values; permit latency; new entrants; median permit holder age; estimated gross earnings; and vessel characteristics for the drift gillnet fleet. It also summarizes Department of Natural Resources shore fishery leases and permit stacking in the set gillnet fishery, as well as dual-permit operations in the drift gillnet fishery. Selected statistics are additionally presented by resident type. A description of the data sources, computer files, and methods used to generate these statistics is included.

Prepared by Reid Johnson

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Introduction

Commercial fishing for salmon in Bristol Bay has been documented as far back as 1884.¹ Historically, many gear types have been employed to commercially harvest salmon in Bristol Bay, but today the two commercial salmon fisheries prosecuted in this region of Alaska include only the drift gillnet and set gillnet fisheries.

In 1972, Alaskan voters amended the state constitution to allow limited entry in the state's commercial fisheries. The following year, the Alaska State Legislature enacted the Limited Entry Act (AS 16.43), giving the Commercial Fisheries Entry Commission (CFEC) the authority to administer the program. Permit fisheries are defined by CFEC as a specific gear type for a fishery resource within a defined administrative area.

Both Bristol Bay salmon fisheries were part of the original group of 19 Alaska salmon fisheries that were limited after the Alaska legislature passed the limited entry act. Limited entry permits for Bristol Bay salmon drift gillnet (S03T) and Bristol Bay salmon set gillnet (S04T) were first issued in 1975.

Limited entry permits were allocated based upon an individual's past participation and economic dependence on the fishery. To allocate permits among qualified applicants, CFEC developed point systems to measure each individual's relative position in the fishery. The Limited Entry Act also required CFEC to determine levels within the point system where individuals would experience only minor economic hardship if excluded from an initial permit allocation. Persons who were ranked at or below the minor economic hardship level received non-transferable permits, while persons who were ranked above the minor economic hardship level received transferable permits. Among Bristol Bay salmon permit fisheries, non-transferable permits were only issued in the set gillnet fishery. CFEC permits are cancelled after two years of non-payment of annual fees. This frequently occurs when the permit holder reaches an age when fishing is no longer feasible, or when the permit holder passes away.

Beginning in the early 2000s, both Bristol Bay salmon fisheries experienced substantial economic pressure as ex-vessel prices declined due to global market changes and competition from farmed salmon. Despite harvests that generally tracked historical averages, profitability dropped, prompting CFEC to conduct the 2004 Optimum Number Study for the Bristol Bay drift gillnet fishery. That study concluded that, under early-2000s economic conditions, an economically efficient fleet would consist of roughly 800–1,200 drift permits, substantially fewer than the more than 1,800 plus permits issued. As prices remained low, the number of active vessels also declined, and once dual-permit operations were later authorized, the number of drift vessels fishing in Bristol Bay stabilized at a level slightly higher than the upper end of the study's optimum permit number range.

Regulatory responses to these economic conditions included the introduction of dual-permit operations in the drift gillnet fishery and permit stacking in the set gillnet fishery. Dual operations allow two permit holders to fish up to 200 fathoms of gear from a single vessel, and although the increase in allowable gear is modest, the economic efficiencies—from shared costs, more effective vessel deployment, and coordinated fishing effort—have led dual-permit vessels to earn substantially more than single-permit operations on average. In the set net fishery, permit stacking allowed two permits to be fished on a single operation, supporting family operations and improving economic viability. However, this authority sunset in 2012, after which set-net permit holders could no longer legally stack two permits on one site.

In more recent years, exceptionally strong sockeye runs—especially from 2018 through 2022—produced harvests well above long-term averages, though market conditions and processor limitations have muted some of the economic benefit. The COVID-19 pandemic further disrupted the fisheries by increasing operating and processing costs, reducing workforce availability, and contributing to volatile ex-vessel prices. These economic shifts reinforced the importance of efficiency-oriented measures such as dual-permit

¹ See Byerly, M., B. Brooks, B. Simonson, H. Savikko, and H.J. Geiger. *Alaska's Commercial Salmon Catches, 1878-1997*. RIR No. 5J99-05.

operations and influenced ongoing discussions about the long-term structure and economic sustainability of the Bristol Bay salmon fleet.

Information regarding season length, openings and closings, size, and other such data can be found in the Alaska Department of Fish and Game's Area Management Reports. This report focuses on the economics of these commercial fisheries. This report provides an overview of limited entry permit holdings and estimated gross earnings in the Bristol Bay commercial salmon fisheries.

ADF&G fish tickets identify, among other things, the species harvested. Salmon species on fish tickets are well documented for each of these fisheries. Variations do exist in the financial composition for each of the five major Pacific salmon species commercially harvested in Bristol Bay from year to year and across each fishery. Commercial harvest of species other than salmon were documented at extremely low rates so they are not displayed in Table 0-1.

Table 0-1. Percent of Total Ex-vessel Value of Bristol Bay Salmon Fisheries by Species, 1975-2024

Species	Area Wide	Bristol Bay Drift Gillnet	Bristol Bay Set Gillnet
Chinook	1.2%	1.2%	0.9%
Sockeye	96.1%	96.1%	96.3%
Coho	0.7%	0.6%	1.3%
Pink	0.4%	0.4%	0.5%
Chum	1.6%	1.7%	1.0%

Description of the Data Files Used to Generate This Report

Several CFEC data files were used to generate the statistics in this report: the gross earnings file, the permit file, the census file, the vessel file, ADF&G vessel registration data, and a DNR shore fishery lease data file. The most recent updated data is included in this report. The following is a brief description of each file. Please contact CFEC for more detail about these files if you are interested.

CFEC Gross Earnings File

The CFEC gross earnings file is based on ADF&G fish tickets and is augmented with CFEC permit holder and other data. The ex-vessel value for salmon in the CFEC gross earnings file largely come from the Commercial Operators Annual Report and ADF&G fish tickets with some additional information provided by processors. ADF&G salmon districts were mapped out from statistical areas using information provided by ADF&G. Several processes to validate and enhance fields such as vessel number and statistical area were undertaken to increase accuracy of this report. Starting in 2016, dual permit operations were identified using fish ticket identifiers.

CFEC Permit File

The CFEC permit file contains data on persons who hold or have held CFEC permits. It originates from CFEC permit renewal and permit transfer forms. The permit file contains a data field indicating the declared residency of permit holders as well as their addresses.

In this report, resident status is categorized into three resident types:

- **Local**— permits held by persons residing locally to the ADF&G management area
- **Nonlocal**— permits held by persons who reside in Alaska outside of the ADF&G management area
- **Nonresidents**— permits held by persons who are not residents of Alaska

CFEC Census File

CFEC maintains a computer file of places within Alaska where permit holders reside. Each community is annotated with information on its local or nonlocal status by permit fishery. Table 0-2 lists the communities that are currently designated as local to Bristol Bay salmon commercial fisheries in the Census file.

Table 0-2. Communities Local to the Bristol Bay Salmon Fisheries, as Indicated in the CFEC Census File

Aleknagik	Igiugig	Kvichak	Nunachuak	South Naknek
Cape Newenham	Igushik	Levelock	Nushagak	Togiak
Clarks Point	Iliamna	Manokotak	Pedro Bay	Twin Hills
Dillingham	Kashiagamiut	Nakeen	Pilot Point	Ugashik
Egegik	King Salmon	Naknek	Pope-Vannoy Ldg	Ungalikthluk
Ekuk	Koggiung	New Stuyahok	Port Alsworth	
Ekwok	Kokhanok	Newhalen	Port Heiden	
Hallersville	Koliganek	Nondalton	Portage Creek	

CFEC Vessel File

CFEC maintains a computer file of vessel registration data back to 1978. Commercial fishermen fill out a form and voluntarily provide data regarding the vessel they intend to use that fishing season.

ADF&G Bristol Bay Vessel Registration Data

Bristol Bay drift gillnet permit holders have registration requirements per 5 AAC 06.370 for much of the fishing season. These ADF&G registration records indicate if the permit holder is fishing by themselves, or jointly with another permit holder on the same vessel as a dual permit operation. The registration data for 2004 to 2015 was used to determine which permits were used in dual permit operations for what date. Because registration requirements do not fully encompass the entire fishing season in Bristol Bay, counts of dual permit operations may not be complete in every instance. Beginning in 2016, ADF&G fish tickets were changed to fully record dual permit operations. As such, ADF&G fish ticket data were used to determine which permits were used in dual permit operations starting in 2016.

DNR Shore Fishery Lease Data File

The DNR Land Administration System contains records used to maintain the DNR Shore Fishery Lease program. These records were merged with the CFEC permit file to create a dataset. Creation of the dataset is described in CFEC Report Number 25-04N, *CFEC Salmon Set Gillnet Permits and DNR Shore Fishery Leases in Prince William Sound, Cook Inlet, Kodiak, Alaska Peninsula, and Bristol Bay 1975-2024*.

Data Display

Percentages are rounded to the nearest tenth of a percent where displayed. Dollars are rounded to whole dollars. As such, rounded aggregates may appear to not total due to rounding. If you would like more precise figures, then please contact the CFEC research unit. Some counts will vary from previous research projects insofar as the data has been corrected and updated.

Chapter 1 Bristol Bay Salmon Drift Gillnet Fishery

S03T Permit Holdings

Limited entry permits for the Bristol Bay salmon drift gillnet fishery (S03T permits) were issued starting in 1975. CFEC has issued 1,875 S03T permits. Table 1-1 indicates the initial distribution and historical net changes in permit holdings for the fishery. Of this total, Alaska Locals received 38.0% (712/1,875) of the permits, Nonlocal Alaskans received 22.3% (417/1,875) of the permits, and Nonresidents received 39.7% (746/1,875). Every permit issued in this fishery was a transferable permit.

Table 1-1. Initial Issuance and Year-end 2024 Totals of Bristol Bay Salmon Drift Gillnet Permits, With Net Changes Due to Permit Transfers, Migrations, and Cancellations, by Resident Type

Residency	Initial Issues		Transfers		Migrations		Cancellations		2024 Year End	
	Count	Percentage	Count	Percent Change	Count	Percent Change	Count	Percent Change	Count	Percent Change
Local	712	38.0%	-330	-46.3%	-92	-12.9%	4	0.6%	286	15.4%
Nonlocal	417	22.2%	219	52.5%	-63	-15.1%	1	0.2%	572	30.7%
Nonresident	746	39.8%	111	14.9%	155	20.8%	8	1.1%	1004	53.9%
Total	1875	100.0%	0	0.00%	0	0.0%	13	0.69%	1862	100.0%

The number of permits held by each resident type can change for three reasons: permits can be transferred to other resident types (transfer); permit holders can move from one location to another (migration); or permits can be cancelled (such as when a permit holder does not pay the renewal fee for two consecutive). This table indicates the extent to which these factors have contributed to net changes in permit holdings in this fishery.

Transfers of S03T Permits

Under the Limited Entry Act's terms of free transferability, permits may be sold, traded, given away, or inherited. CFEC requires the completion of a survey with each transfer.² The surveys provide information such as transfer acquisition methods, the relationship between individuals in the transaction, and the sale amount for instances when the permit is sold.

Table 1-2. Transfer Acquisition Methods for Bristol Bay Salmon Drift Gillnet Permits, 1980-2024

Acquisition Method	Bristol Bay Salmon Drift Net		Combined Bristol Bay Salmon		Statewide Salmon Drift Gillnet		All Fisheries Statewide	
	Count	Percent	Count	Percent	Count	Percent	Count	Percent
Gift	2,278	33.2%	4,345	39.5%	4,117	30.8%	14,341	33.0%
Sale	4,058	59.1%	5,878	53.4%	8,280	61.9%	25,299	58.2%
Trade	42	0.6%	68	0.6%	127	0.9%	541	1.2%
Other	483	7.0%	718	6.5%	855	6.4%	3,294	7.6%
Total	6,861	100.0%	11,009	100.0%	13,379	100.0%	43,475	100.0%

Table 1-2 compares transfer acquisition methods for the S03T permits, the combined Bristol Bay salmon permit types, statewide salmon drift gillnet permits, and all limited entry permits between 1980 and 2024. A third of all S03T permit transfers were gifts (2,278), more than half of all transfers were sales (4,058), and a smaller percentage were trades (42) or other (483). The annual acquisition methods for S03T permits can be viewed in a different publication.³

² CFEC implemented the transfer survey in 1980.

³ See *Changes in the Distribution of Alaska's Commercial Fisheries Entry Permits, 1975-2024*, CFEC Report No. 25-03N.

*Bristol Bay Salmon Drift Gillnet Fishery (S03T)***Table 1-3. Relationships of Transferor to Transfer Recipients for Bristol Bay Salmon Drift Gillnet Permits, 1980-2024**

Relationship	Bristol Bay Salmon Drift Net		Combined Bristol Bay Salmon		Statewide Salmon Drift Gillnet		All Fisheries Statewide	
	Count	Percent	Count	Percent	Count	Percent	Count	Percent
Business Partner/Friend	1,196	17.4%	2,179	19.8%	2,235	16.7%	8,189	18.8%
Member of Immediate Family	2,186	31.9%	3,841	34.9%	4,152	31.0%	14,586	33.6%
Other Relative	303	4.4%	594	5.4%	560	4.2%	1,938	4.5%
Other	3,176	46.3%	4,395	39.9%	6,432	48.1%	18,762	43.2%
Total	6,861	100.0%	11,009	100.0%	13,379	100.0%	43,475	100.0%

Table 1-3 shows the relationships between transferors and transfer recipients for S03T permits and compares S03T permit transfers with the combined Bristol Bay salmon permit types, statewide salmon drift gillnet permits, and all limited entry permits from 1980 to 2024. Transfers within the family, both immediate family members and other relatives, total 36.3% (2,489) of all transfers. This compares to 40.3% (4,435) for all Bristol Bay salmon permit types combined, 35.2% (4,712) for statewide salmon drift gillnet permits, and 38.1% (16,524) for all limited entry permits statewide.

Emergency Transfers of S03T Permits

Commercial landings can be made with either permanently held permits or with permits held temporarily through emergency transfers. Emergency transfers (ET) of permits are granted if illness, disability, death, required military or government service, or other unavoidable hardship of a temporary, unexpected, and unforeseen nature prevents the permanent permit holder from participating in the fishery. “Hardship” does not include the results of a permit holder’s own economic decisions, or the results of economic, biological or regulatory variables which are normally part of the risk of doing business as a fisherman. At the end of the year, ET permits automatically revert to the permanent permit holder.

Table 1-4 shows the total number of individuals who recorded landings each year, and of that group, the number of individuals who made landings with ET permits. The percentage of individuals using an emergency transfer to participate in the S03T fishery has been consistently around 10 percent since the mid 1990’s.

Table 1-4. Use of Emergency Transfer Permits in the Bristol Bay Salmon Drift Gillnet Fishery, 1975-2024

ET Permit Holders With Landings				ET Permit Holders With Landings				ET Permit Holders With Landings			
Year	Individuals With Landings	Rate ET		Year	Individuals With Landings	Rate ET		Year	Individuals With Landings	Rate ET	
1975	1252	34	2.7%	1993	1931	202	10.5%	2011	1548	164	10.6%
1976	1362	46	3.4%	1994	1924	226	11.7%	2012	1526	148	9.7%
1977	1363	44	3.2%	1995	1928	209	10.8%	2013	1500	164	10.9%
1978	1587	48	3.0%	1996	1922	227	11.8%	2014	1555	162	10.4%
1979	1731	57	3.3%	1997	1914	233	12.2%	2015	1559	151	9.7%
1980	1782	70	3.9%	1998	1887	218	11.6%	2016	1784	196	11.0%
1981	1812	85	4.7%	1999	1876	214	11.4%	2017	1790	197	11.0%
1982	1813	81	4.5%	2000	1843	208	11.3%	2018	1804	201	11.1%
1983	1818	71	3.9%	2001	1577	172	10.9%	2019	1860	199	10.7%
1984	1838	84	4.6%	2002	1187	115	9.7%	2020	1779	213	12.0%
1985	1834	90	4.9%	2003	1432	148	10.3%	2021	1809	207	11.4%
1986	1861	102	5.5%	2004	1416	139	9.8%	2022	1845	194	10.5%
1987	1863	128	6.9%	2005	1459	144	9.9%	2023	1746	180	10.3%
1988	1874	120	6.4%	2006	1492	148	9.9%	2024	1724	160	9.3%
1989	1889	111	5.9%	2007	1481	140	9.5%				
1990	1908	134	7.0%	2008	1484	139	9.4%				
1991	1900	149	7.8%	2009	1453	152	10.5%				
1992	1925	162	8.4%	2010	1510	158	10.5%				

Latent S03T Permits

CFEC regulations require individuals to renew their limited entry permits annually, regardless of whether they fish. Permits that are not used (don't record landings) each year are referred to herein as "latent" permits for that year.

Table 1-5 indicates the total number of viable S03T permits issued each year, the number of permits fished (with commercial landings), and the rate of permit latency. Viable permits include both interim entry and permanent permits. Note that for this table, in years when a single individual held an interim-entry permit and was also issued a permanent permit, only the permanent permit is counted. The yearly percentage of latency is depicted in Figure 1-1.

There are many reasons why an individual might not fish in any given year. This table and figure do not explain any of these reasons.

Table 1-5. Bristol Bay Salmon Drift Gillnet Permit Latency, 1975-2024

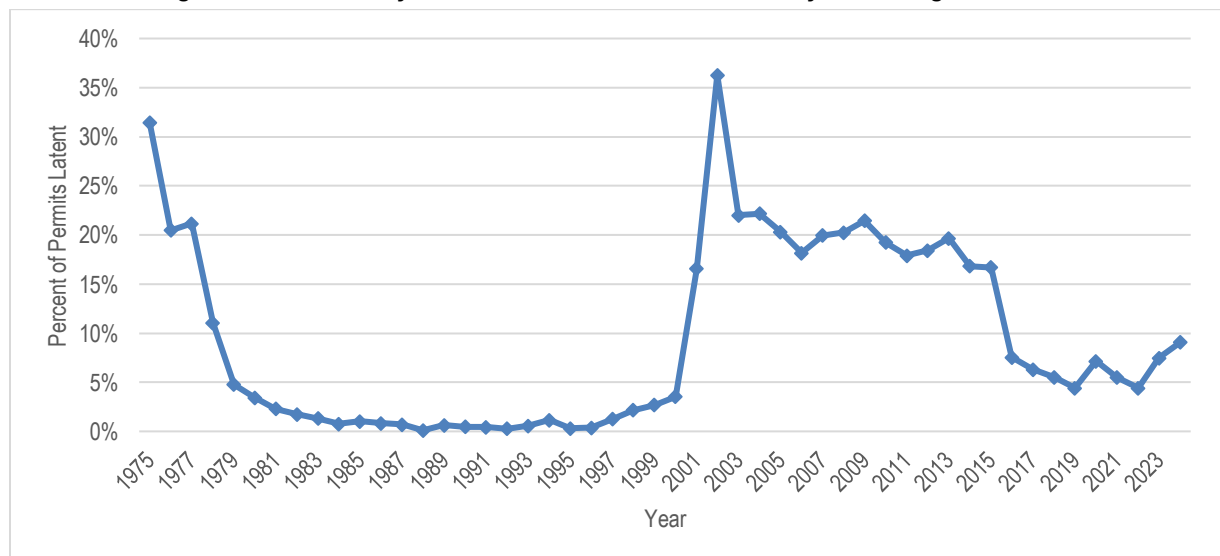
Year	Permits		Latency Rate
	Issued	Fished	
1975	1821	1249	31.4%
1976	1705	1356	20.5%
1977	1724	1359	21.2%
1978	1771	1575	11.1%
1979	1800	1714	4.8%
1980	1827	1764	3.4%
1981	1827	1785	2.3%
1982	1824	1792	1.8%
1983	1821	1797	1.3%
1984	1818	1804	0.8%
1985	1834	1815	1.0%
1986	1838	1823	0.8%
1987	1837	1824	0.7%
1988	1839	1837	0.1%
1989	1867	1855	0.6%
1990	1878	1869	0.5%
1991	1881	1873	0.4%

Year	Permits		Latency Rate
	Issued	Fished	
1992	1884	1879	0.3%
1993	1886	1875	0.6%
1994	1887	1865	1.2%
1995	1888	1882	0.3%
1996	1891	1884	0.4%
1997	1899	1875	1.3%
1998	1899	1858	2.2%
1999	1898	1847	2.7%
2000	1890	1823	3.5%
2001	1877	1566	16.6%
2002	1858	1184	36.3%
2003	1826	1424	22.0%
2004	1813	1411	22.2%
2005	1816	1447	20.3%
2006	1802	1475	18.1%
2007	1834	1468	20.0%
2008	1842	1469	20.2%

Year	Permits		Latency Rate
	Issued	Fished	
2009	1838	1444	21.4%
2010	1850	1494	19.2%
2011	1856	1524	17.9%
2012	1855	1513	18.4%
2013	1852	1488	19.7%
2014	1853	1541	16.8%
2015	1855	1545	16.7%
2016	1855	1715	7.5%
2017	1854	1737	6.3%
2018	1851	1749	5.5%
2019	1858	1776	4.4%
2020	1858	1725	7.2%
2021	1856	1754	5.5%
2022	1859	1777	4.4%
2023	1859	1720	7.5%
2024	1853	1685	9.1%

- When an individual with an interim-entry permit is issued a permanent permit in the same year, only the permanent permit is counted in the above table.
- 'Permits Fished' is the number of CFEC permits that were used to record commercial landings in that year.

Figure 1-1. Bristol Bay Salmon Drift Gillnet Permit Latency Percentage, 1975-2024



New Entrants into the Bristol Bay Salmon Drift Gillnet Fishery

New entrants are defined herein as individuals who, for the first time, record a landing on a permanent S03T permit. It is important to note that initial permit holders are not considered new entrants because they needed a proven fishing history prior to 1975 in order to become an initial permit holder. Individuals who only make landings on an emergency transfer or interim-entry permit for any given year are not considered in this table.

Table 1-6. New Entrants into the Bristol Bay Salmon Drift Gillnet Fishery, 1975-2024

Year	Individuals With Landings	New Entrants with Landings	% New Entrants
1975	1252	73	5.8%
1976	1362	110	8.1%
1977	1363	123	9.0%
1978	1587	178	11.2%
1979	1731	168	9.7%
1980	1782	149	8.4%
1981	1812	126	7.0%
1982	1813	148	8.2%
1983	1818	149	8.2%
1984	1838	121	6.6%
1985	1834	108	5.9%
1986	1861	113	6.1%
1987	1863	89	4.8%
1988	1874	104	5.5%
1989	1889	93	4.9%
1990	1908	75	3.9%
1991	1900	81	4.3%
1992	1925	83	4.3%

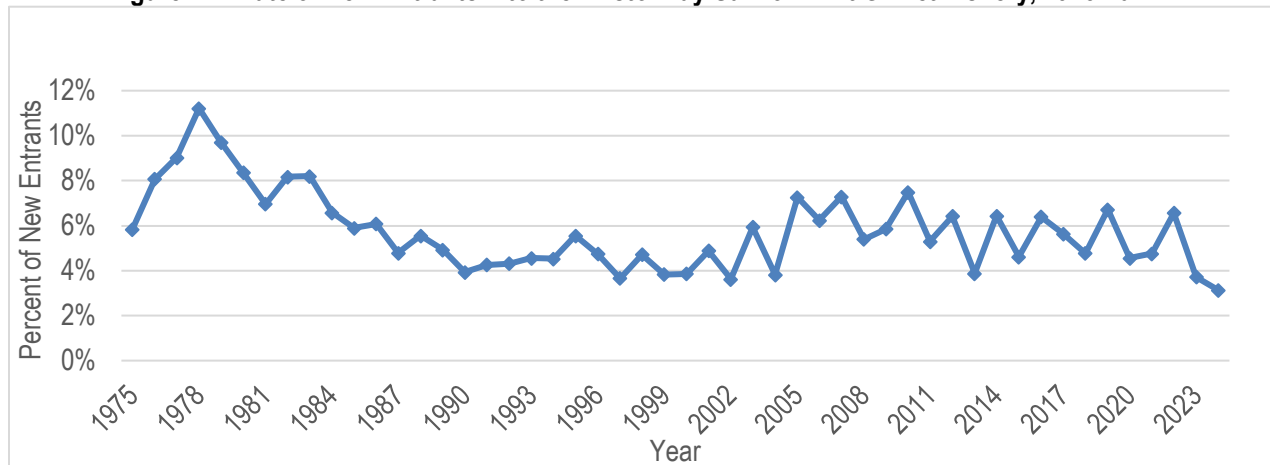
Year	Individuals With Landings	New Entrants with Landings	% New Entrants
1993	1931	88	4.6%
1994	1924	87	4.5%
1995	1928	107	5.5%
1996	1922	91	4.7%
1997	1914	70	3.7%
1998	1887	89	4.7%
1999	1876	72	3.8%
2000	1843	71	3.9%
2001	1577	77	4.9%
2002	1187	43	3.6%
2003	1432	85	5.9%
2004	1416	54	3.8%
2005	1459	106	7.3%
2006	1492	93	6.2%
2007	1481	108	7.3%
2008	1484	80	5.4%
2009	1453	85	5.8%
2010	1510	113	7.5%

Year	Individuals With Landings	New Entrants with Landings	% New Entrants
2011	1548	82	5.3%
2012	1526	98	6.4%
2013	1500	58	3.9%
2014	1555	100	6.4%
2015	1559	72	4.6%
2016	1784	114	6.4%
2017	1790	101	5.6%
2018	1804	86	4.8%
2019	1860	125	6.7%
2020	1779	81	4.6%
2021	1809	86	4.8%
2022	1845	121	6.6%
2023	1746	65	3.7%
2024	1724	54	3.1%

- This table excludes individuals with interim-entry and emergency transfer permits.
- Regulations were passed in 2004 allowing for dual permit operations (indicated by line).

Table 1-6 and Figure 1-2 describe individuals rather than permits. An individual may hold up to two permits in this fishery, but can only fish one of them. An individual may also hold one S03T permit one year, and then in subsequent years hold a different S03T permit. Likewise, individuals may enter and exit the fishery multiple times over the years. Individuals are only counted once as a new entrant and only in the year in which they made their first documented landing on a permanent permit. The number of new entrants in the S03T fishery has remained consistent at between 8 and 3 percent since the 1980's as illustrated in figure 2.

Figure 1-2. Rate of New Entrants into the Bristol Bay Salmon Drift Gillnet Fishery, 1975-2024



S03T Dual Permit Operations

The Alaska Board of Fisheries enacted 5 AAC 06.333 and 5 AAC 06.370, which allows for two Bristol Bay salmon drift gillnet permit holders to fish from a single vessel starting in 2004. These vessels are required to be marked with the letter D, and are colloquially called “D Boats”. Vessels that operate in a dual configuration are allowed to deploy up to 200 fathoms of gear, which is an increase of 33.3% over the single permit allotment of gear, which is 150 fathoms. In 2004 a total of 108 vessels operated as D Boats (table 1). This number of D Boats has increased every year since 2004 (figure 1-4). In 2024 465 vessels operated as D Boats.

In order for two permit holders to fish aboard the same vessel, they must register with ADF&G in advance. Dual-permit operations do not require both permit holders to fish together for the entire season; it is common for vessels to begin the season fishing a single permit, register as a dual-permit (“D-Boat”) operation during the peak of the run, and then finish the season fishing a single permit again; therefore, the vessel may count in both single and dual permit categories in table 1-7.

Figure 1-3. Bristol Bay Drift Gillnet Dual Fishing Permit Vessels, 2004 – 2024

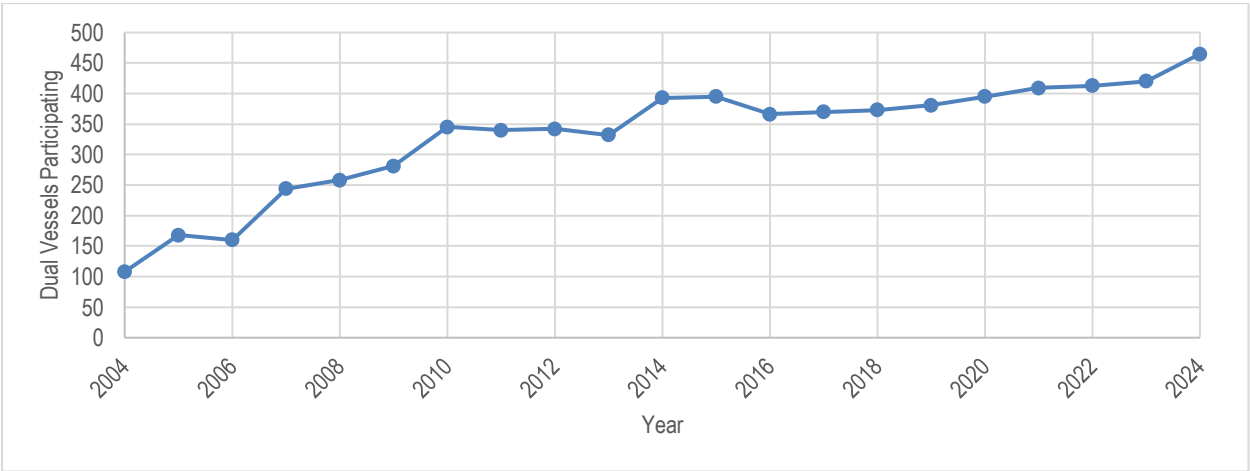


Table 1-7. Dual and Single Permit Vessel Operations, 2004-2024

Year	Dual Permit Vessels	Single Permit Vessels	Total Vessels
2004	108	1302	1372
2005	168	1299	1387
2006	160	1390	1463
2007	244	1223	1403
2008	258	1184	1396
2009	281	1136	1356
2010	345	1297	1407
2011	340	1355	1444
2012	342	1218	1433
2013	332	1347	1408
2014	393	1302	1464
2015	395	1273	1478
2016	366	1213	1372
2017	370	1278	1386
2018	373	1253	1382
2019	381	1257	1416
2020	395	1172	1350
2021	409	1161	1360
2022	413	1235	1383
2023	420	1113	1312
2024	465	978	1236

Bristol Bay Salmon Drift Gillnet Fishery (S03T)

Table 1-8 displays the earnings per vessel, and the earnings per permit aboard those vessels in both single and dual permit vessel operations. As vessel my switch between dual and single permit operations within a given year, earnings are apportioned based upon if the vessel was registered as a D-Boat or not at the time a delivery was made. D-Boats on average have twice the gross earnings as single permit vessel operations, but per permit, earnings are roughly the same from one year to the next (figure 1-4).

Figure 1-4. Bristol Bay Drift Gillnet Dual Fishing Permit Vessels, 2004 – 2024

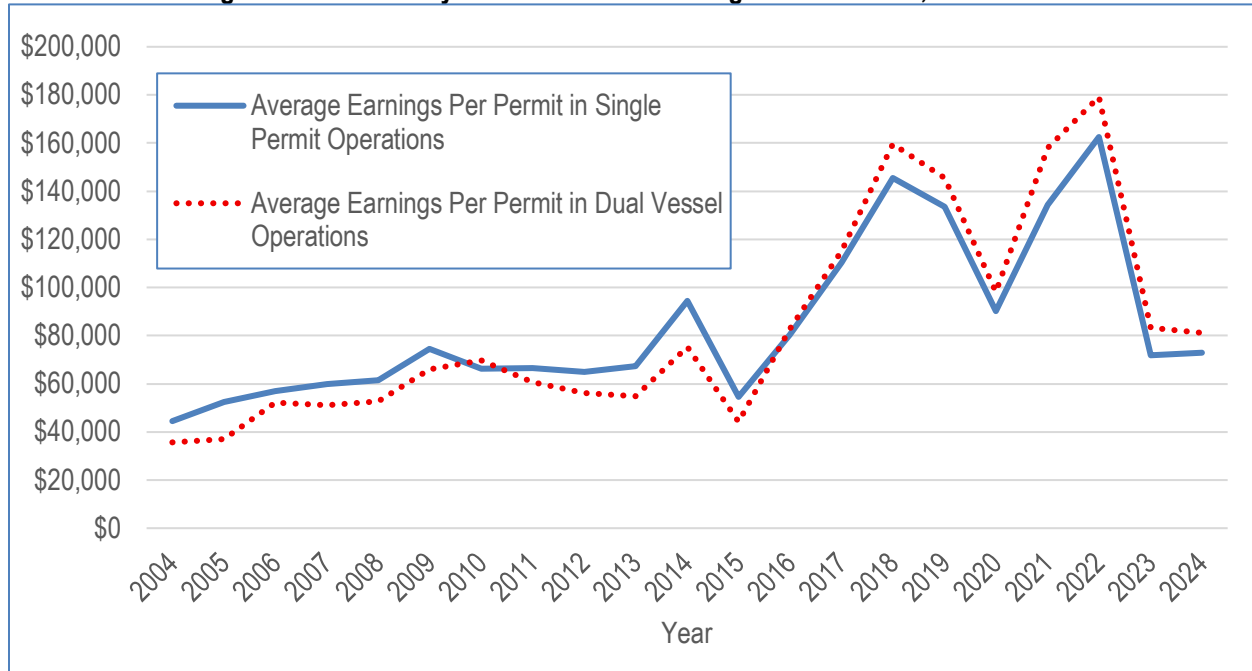


Table 1-8. Earnings by Vessel and Operation Type, 2004 – 2024

Year	Single Permit Vessel Operations				Dual Permit Vessel Operations			
	Vessels	Total Earnings	Average Vessel Earnings	Average Earnings Per Permit	Vessels	Total Earnings	Average Vessel Earnings	Average Earnings Per Permit
2004	1302	\$57,917,694	\$44,484	\$44,484	108	\$7,702,015	\$71,315	\$35,657
2005	1299	\$68,169,689	\$52,479	\$52,479	168	\$12,395,823	\$73,785	\$36,892
2006	1390	\$79,083,741	\$56,895	\$56,895	160	\$16,722,505	\$104,516	\$52,258
2007	1223	\$73,064,030	\$59,742	\$59,742	244	\$24,885,191	\$101,988	\$50,994
2008	1184	\$72,914,051	\$61,583	\$61,583	258	\$27,162,393	\$105,281	\$52,640
2009	1136	\$84,764,165	\$74,616	\$74,616	281	\$37,014,146	\$131,723	\$65,861
2010	1297	\$85,794,086	\$66,148	\$66,148	345	\$48,044,845	\$139,260	\$69,630
2011	1355	\$90,113,327	\$66,504	\$66,504	340	\$41,224,918	\$121,250	\$60,625
2012	1218	\$79,224,777	\$65,045	\$65,045	342	\$38,421,590	\$112,344	\$56,172
2013	1347	\$90,789,148	\$67,401	\$67,401	332	\$36,425,811	\$109,716	\$54,858
2014	1302	\$122,954,806	\$94,435	\$94,435	393	\$59,162,338	\$150,540	\$75,270
2015	1273	\$69,577,436	\$54,656	\$54,656	395	\$34,941,146	\$88,459	\$44,229
2016	1213	\$97,482,145	\$80,365	\$80,365	366	\$60,548,741	\$165,434	\$82,717
2017	1278	\$141,151,464	\$110,447	\$110,447	370	\$85,311,357	\$230,571	\$115,286
2018	1253	\$182,274,327	\$145,470	\$145,470	373	\$119,125,559	\$319,371	\$159,686
2019	1257	\$167,741,320	\$133,446	\$133,446	381	\$110,839,521	\$290,917	\$145,459
2020	1172	\$105,768,509	\$90,246	\$90,246	395	\$77,528,294	\$196,274	\$98,137
2021	1161	\$156,021,609	\$134,386	\$134,386	409	\$129,301,871	\$316,141	\$158,071
2022	1235	\$200,689,773	\$162,502	\$162,502	413	\$148,004,647	\$358,365	\$179,182
2023	1113	\$79,965,895	\$71,847	\$71,847	420	\$70,017,494	\$166,708	\$83,354
2024	978	\$71,242,170	\$72,845	\$72,845	465	\$75,535,138	\$162,441	\$81,221

Age of S03T Permit Holders

Table 1-9. Median Age of Select CFEC Permit Holders and the General Alaskan Population

Year	S03T	Combined Bristol Bay Salmon	Statewide Salmon Drift Gillnet	State- wide all Permits	Median Alaskan Age
1980	42.6	39.3	41.6	39.4	26.0
1981	42.5	39.2	41.3	39.4	26.4
1982	41.8	38.9	40.5	39.3	26.8
1983	41.5	38.9	40.4	39.4	27.1
1984	41.8	39.2	40.7	39.7	27.3
1985	42.0	39.4	40.9	40.0	27.5
1986	42.1	39.8	40.7	40.0	27.8
1987	42.3	39.7	41.1	40.3	28.2
1988	42.3	39.7	41.3	40.5	28.6
1989	42.8	40.1	41.5	40.9	29
1990	43.1	40.6	42.0	41.3	29.3
1991	43.2	41.0	42.3	41.8	29.7
1992	43.4	41.5	42.8	42.3	30.1
1993	43.4	41.9	43.1	42.8	30.5
1994	43.8	42.4	43.7	43.3	30.8
1995	44.0	43.0	43.9	43.7	31.1
1996	44.5	43.5	44.3	44.3	31.5
1997	45.2	44.1	45.0	44.9	31.8
1998	45.4	44.4	45.4	45.3	32.1
1999	46.1	45.1	45.9	45.9	32.3
2000	46.7	45.5	46.5	46.3	32.4
2001	47.3	46.1	47.1	46.8	32.7
2002	48.1	47.0	47.9	47.5	33.0
2003	48.4	47.3	48.3	48.1	33.2
2004	49.0	47.8	48.8	48.6	33.4
2005	49.0	47.7	49.0	49.0	33.6
2006	49.5	48.0	49.4	49.4	33.8
2007	49.0	47.8	49.5	49.8	33.9
2008	49.4	48.2	49.9	50.2	33.9
2009	49.8	48.6	50.2	50.6	33.9
2010	49.9	49.0	50.3	51.0	33.8
2011	50.4	49.4	50.6	51.3	33.9
2012	50.9	49.7	50.8	51.7	33.9
2013	51.0	49.5	50.8	51.8	34.0
2014	51.0	49.4	51.0	52.2	34.2
2015	51.5	49.6	51.2	52.6	34.4
2016	51.6	49.9	51.3	53.1	34.6
2017	51.1	50.0	51.6	53.6	34.8
2018	50.3	49.1	51.4	53.9	35.1
2019	49.6	48.6	51.4	54.0	35.4
2020	49.7	48.5	51.6	54.3	35.6
2021	48.6	46.9	51.3	54.6	36
2022	47.0	45.8	51.2	54.7	36.4
2023	46.2	45.4	50.8	55.0	36.5
2024	46.0	45.3	50.6	55.3	36.9

Table 1-9 shows the annual median age of five different cohorts of people: 1) Bristol Bay salmon drift gillnet (S03T) permit holders; 2) combined Bristol Bay salmon permit holders; 3) statewide salmon drift gillnet permit holders 4) all CFEC limited entry permit holders; and 5) the Alaskan population.

Note that these figures include ages of permit holders for both transferable and non-transferable permits; however, there were no non-transferable S03T permits issued. Some individuals hold permits in more than one fishery; in these cases, the age of the permit holder is counted once for each permit that they hold.

Between 1980 and 2016, the median age of S03T permit holders increased from 42.6 years to 51.6 years. Starting in 2016 median ages began to decrease; the median age of a permit holder in 2024 was 46 years. Over the same time from, the median age of all Alaskans increased from 26 years in 1980 to just under 37 years in 2024, an increase of 11 years.

The median age of all permit holders, statewide in Alaska, has increased from 39.4 years in 1980 to 55.3 years in 2024.

*Bristol Bay Salmon Drift Gillnet Fishery (S03T)***S03T Permit Value**

Many permit transfers are non-monetary transactions (see Table 1-2). Table 1-10 considers solely arms-length market transactions where permits are sold. CFEC estimated values are expressed in both nominal and real (adjusted for inflation) terms.

Table 1-10. CFEC Estimated Value of Bristol Bay Salmon Drift Gillnet Permits

Year	S03T Permit Sales	Nominal		Real	
		Permit Value	Standard Deviation	Permit Value	Standard Deviation
1987	65	\$131,300	\$17,661	\$358,700	\$49,600
1988	44	\$181,600	\$41,404	\$476,600	\$111,700
1989	41	\$255,600	\$32,667	\$640,000	\$84,100
1990	60	\$217,100	\$20,966	\$515,800	\$51,200
1991	53	\$209,200	\$24,410	\$477,100	\$57,200
1992	59	\$192,000	\$27,262	\$424,800	\$62,000
1993	60	\$198,600	\$18,428	\$426,500	\$40,700
1994	72	\$166,500	\$15,097	\$348,600	\$32,500
1995	79	\$195,300	\$18,959	\$397,800	\$39,700
1996	62	\$172,400	\$10,422	\$341,200	\$21,200
1997	50	\$153,800	\$23,041	\$297,300	\$45,800
1998	64	\$96,700	\$8,633	\$184,100	\$16,900
1999	48	\$88,500	\$7,831	\$164,900	\$15,000
2000	49	\$80,400	\$12,520	\$144,900	\$23,200
2001	43	\$34,000	\$8,600	\$59,700	\$15,500
2002	66	\$19,800	\$2,762	\$34,200	\$4,900
2003	106	\$29,600	\$3,863	\$49,900	\$6,700
2004	75	\$36,700	\$3,967	\$60,400	\$6,700
2005	115	\$51,300	\$8,751	\$81,600	\$14,300
2006	98	\$75,000	\$5,685	\$115,400	\$9,000
2007	147	\$79,400	\$4,874	\$118,900	\$7,500
2008	87	\$89,800	\$5,397	\$129,400	\$8,000
2009	100	\$78,000	\$5,716	\$112,800	\$8,500
2010	107	\$102,300	\$14,694	\$145,700	\$21,500
2011	84	\$143,600	\$14,803	\$198,100	\$21,000
2012	75	\$110,800	\$11,944	\$149,800	\$16,600
2013	72	\$100,400	\$13,506	\$133,800	\$18,500
2014	74	\$149,500	\$10,831	\$196,000	\$14,600
2015	48	\$148,200	\$21,392	\$194,000	\$28,800
2016	56	\$108,900	\$12,411	\$140,800	\$16,500
2017	76	\$133,300	\$5,839	\$168,800	\$7,600
2018	84	\$153,000	\$8,105	\$189,200	\$10,300
2019	81	\$175,000	\$6,089	\$212,400	\$7,600
2020	55	\$169,400	\$15,981	\$203,100	\$19,700
2021	98	\$188,300	\$17,833	\$215,700	\$21,000
2022	89	\$230,700	\$16,324	\$244,700	\$17,800
2023	60	\$170,200	\$27,979	\$173,400	\$29,300
2024	83	\$132,900	\$5,604	\$132,900	\$5,700

- Permit values represent averages of all arms-length sale transactions over the year. Beginning in 1991, additional data from recent months in the preceding year may be included until at least four observations can be averaged.
- Real permit values were calculated using the 2025 Consumer Price Index from the U.S. Bureau of Labor Statistics.

Bristol Bay Salmon Drift Gillnet Vessel Characteristics

Table 1-11 reports on various vessel characteristics of the Bristol Bay salmon drift gillnet fleet since 1978. Reported in this table are the age, length, horsepower, hold refrigeration, and hold capacity. This data is from the vessel license file which includes voluntarily supplied information on vessels. The first column of each category is the count of vessels with the characteristics described; other statistics reported include the 25th percentile, median, and 75th percentile.

Table 1-11. Bristol Bay Salmon Drift Gillnet Vessel Characteristics

Year	Vessel		Age			Length			Horsepower			Refrigeration			Hold Capacity					
	Count	Count	25%	Median	75%	Count	25%	Median	75%	Count	25%	Median	75%	Considered	Count	%	Count	25%	Median	75%
1978	1,883	1,512	5	13	18	1,565	26	31	32	1,523	95	160	225	1,300	13	1.0%	578	168	200	300
1979	2,103	1,719	2	10	18	1,750	28	32	32	1,626	110	165	225	1,475	23	1.6%	699	168	228	320
1980	2,114	1,776	1	6	18	1,791	29	32	32	1,615	130	185	270	1,533	23	1.5%	802	190	250	350
1981	1,987	1,718	2	5	18	1,724	29	32	32	1,577	135	200	270	1,511	21	1.4%	758	200	250	360
1982	1,975	1,757	2	4	17	1,760	30	32	32	1,615	160	210	280	1,601	17	1.1%	795	200	270	375
1983	2,008	1,796	3	5	17	1,796	30	32	32	1,714	165	225	285	1,673	22	1.3%	869	200	280	370
1984	2,141	1,845	4	5	16	1,850	30	32	32	1,779	165	225	300	1,745	24	1.4%	938	200	300	380
1985	2,208	1,885	5	6	16	1,888	31	32	32	1,828	165	240	310	1,786	30	1.7%	997	200	300	400
1986	2,110	1,911	5	7	15	1,916	31	32	32	1,858	170	250	320	1,818	38	2.1%	1,065	200	300	400
1987	2,072	1,921	5	8	16	1,922	31	32	32	1,856	180	252	320	1,809	36	2.0%	1,060	200	300	400
1988	2,174	1,947	6	9	14	1,949	32	32	32	1,895	185	260	330	1,837	38	2.1%	1,115	210	300	400
1989	2,304	2,014	6	9	12	2,016	32	32	32	1,965	188	260	330	1,908	55	2.9%	1,153	216	310	420
1990	2,241	2,026	7	10	12	2,026	32	32	32	1,970	200	260	330	1,880	67	3.6%	1,143	220	320	410
1991	2,164	1,983	7	11	13	1,983	32	32	32	1,945	205	270	340	1,846	88	4.8%	1,133	240	320	420
1992	2,384	2,040	8	12	14	2,041	32	32	32	2,000	210	270	350	1,894	105	5.5%	1,180	229	320	420
1993	2,491	2,079	8	13	15	2,079	32	32	32	2,043	210	270	350	1,927	131	6.8%	1,193	240	325	440
1994	2,437	2,041	9	14	16	2,045	32	32	32	2,003	210	275	365	1,901	154	8.1%	1,178	240	325	430
1995	2,613	2,075	9	15	17	2,078	32	32	32	2,030	210	280	375	1,923	182	9.5%	1,183	240	325	450
1996	2,130	1,969	9	16	17	1,970	32	32	32	1,924	225	300	400	1,821	188	10.3%	1,123	250	325	432
1997	2,106	1,963	10	16	18	1,965	32	32	32	1,921	230	300	420	1,820	207	11.4%	1,097	250	325	432
1998	2,077	1,921	11	17	19	1,923	32	32	32	1,885	235	300	425	1,784	219	12.3%	1,073	240	325	432
1999	2,154	1,943	11	18	20	1,947	32	32	32	1,907	225	300	425	1,798	224	12.5%	1,068	240	325	432
2000	2,138	1,897	12	19	21	1,899	32	32	32	1,865	235	300	425	1,766	221	12.5%	1,049	240	325	432
2001	1,876	1,625	13	19	22	1,626	32	32	32	1,595	235	300	425	1,521	197	13.0%	904	240	320	431
2002	1,355	1,204	14	20	23	1,209	32	32	32	1,184	235	300	425	1,124	157	14.0%	661	245	325	450
2003	1,720	1,474	15	21	24	1,479	32	32	32	1,446	235	303	425	1,370	195	14.2%	777	240	325	450
2004	1,606	1,399	16	22	25	1,404	32	32	32	1,374	250	310	425	1,304	201	15.4%	750	240	325	450
2005	1,736	1,437	17	23	26	1,439	32	32	32	1,407	235	310	425	1,346	215	16.0%	781	240	325	440
2006	1,779	1,491	17	24	27	1,494	32	32	32	1,465	250	315	430	1,405	227	16.2%	811	240	325	450
2007	1,714	1,441	18	25	28	1,444	32	32	32	1,416	250	320	430	1,364	231	16.9%	788	243	335	455
2008	1,612	1,417	19	26	29	1,420	32	32	32	1,395	250	320	430	1,346	244	18.1%	779	240	325	475
2009	1,601	1,399	20	27	30	1,400	32	32	32	1,379	250	320	430	1,330	259	19.5%	771	240	334	460
2010	1,445	1,441	21	28	31	1,442	32	32	32	1,418	250	320	430	1,377	289	21.0%	800	244	336	455

-continued-

Bristol Bay Salmon Drift Gillnet Fishery (S03T)

Table 1-11. Bristol Bay Salmon Drift Gillnet Vessel Characteristics

Year	Vessel		Age			Length			Horsepower			Refrigeration			Hold Capacity					
	Count	Count	25%	Median	75%	Count	25%	Median	75%	Count	25%	Median	75%	Considered	Count	%	Count	25%	Median	75%
2011	1,484	1,476	22	29	32	1,476	32	32	32	1,446	250	320	435	1,418	325	22.9%	816	240	325	450
2012	1,450	1,444	23	29	33	1,444	32	32	32	1,416	250	325	450	1,397	371	26.6%	823	240	325	475
2013	1,413	1,411	23	30	34	1,412	32	32	32	1,384	250	330	450	1,364	396	29.0%	798	245	325	450
2014	1,475	1,474	24	31	35	1,474	32	32	32	1,440	260	330	460	1,420	435	30.6%	832	240	340	480
2015	1,493	1,480	25	32	36	1,480	32	32	32	1,451	260	350	460	1,430	467	32.7%	846	250	350	480
2016	1,386	1,376	25	32	36	1,376	32	32	32	1,354	260	350	480	1,330	486	36.5%	780	250	350	500
2017	1,396	1,392	26	33	37	1,392	32	32	32	1,371	265	370	500	1,343	521	38.8%	779	250	350	500
2018	1,387	1,385	27	34	38	1,385	32	32	32	1,362	270	375	503	1,334	575	43.1%	778	250	350	500
2019	1,416	1,415	26	34	39	1,415	32	32	32	1,388	270	380	525	1,366	632	46.3%	817	250	350	500
2020	1,350	1,348	26	34	40	1,348	32	32	32	1,327	290	400	600	1,300	675	51.9%	794	256	365	512
2021	1,360	1,358	26	34	41	1,358	32	32	32	1,334	300	420	600	1,311	722	55.1%	815	256	375	550
2022	1,383	1,382	26	34	42	1,382	32	32	32	1,356	300	425	630	1,329	762	57.3%	827	280	380	546
2023	1,312	1,311	25	34	42	1,311	32	32	32	1,282	318	430	650	1,250	762	61.0%	774	290	398	576
2024	1,236	1,233	14	35	42	1,233	32	32	32	1,207	320	450	670	1,175	755	64.3%	727	300	400	585

- Total includes every vessel used in this fishery from 1978 to 2024.

Bristol Bay Salmon Drift Gillnet Fishery (S03T)

Table 1-12 provides additional Bristol Bay salmon drift gillnet vessel characteristics. Included are statistics of engine propulsion and hull material for each year since 1978.

Table 1-12. Additional Bristol Bay Salmon Drift Gillnet Vessel Characteristics

Year	Vessel	Engine Power Source					Hull Material												
	Count	Count	Diesel		Gas		Count	Aluminum		Fiberglass		Concrete		Steel		Rubber		Wood	
1978	1,883	1,559	347	22.3%	1,212	77.7%	1,567	127	8.1%	280	17.9%	0	0.0%	10	0.6%	0	0.0%	1,150	73.4%
1979	2,103	1,729	515	29.8%	1,214	70.2%	1,742	198	11.4%	449	25.8%	0	0.0%	10	0.6%	0	0.0%	1,085	62.3%
1980	2,114	1,788	707	39.5%	1,081	60.5%	1,781	275	15.4%	647	36.3%	0	0.0%	5	0.3%	0	0.0%	854	48.0%
1981	1,987	1,728	734	42.5%	994	57.5%	1,710	272	15.9%	650	38.0%	0	0.0%	5	0.3%	0	0.0%	783	45.8%
1982	1,975	1,762	859	48.8%	903	51.2%	1,754	314	17.9%	760	43.3%	0	0.0%	4	0.2%	0	0.0%	676	38.5%
1983	2,008	1,796	921	51.3%	875	48.7%	1,794	350	19.5%	804	44.8%	0	0.0%	9	0.5%	0	0.0%	631	35.2%
1984	2,141	1,847	990	53.6%	857	46.4%	1,846	384	20.8%	859	46.5%	0	0.0%	12	0.7%	0	0.0%	591	32.0%
1985	2,208	1,886	1,053	55.8%	833	44.2%	1,885	428	22.7%	914	48.5%	0	0.0%	6	0.3%	0	0.0%	537	28.5%
1986	2,110	1,908	1,131	59.3%	777	40.7%	1,912	462	24.2%	950	49.7%	0	0.0%	7	0.4%	0	0.0%	493	25.8%
1987	2,072	1,904	1,152	60.5%	752	39.5%	1,920	485	25.3%	969	50.5%	0	0.0%	8	0.4%	0	0.0%	458	23.9%
1988	2,174	1,940	1,225	63.1%	715	36.9%	1,945	527	27.1%	988	50.8%	0	0.0%	11	0.6%	0	0.0%	419	21.5%
1989	2,304	2,005	1,308	65.2%	697	34.8%	2,012	596	29.6%	1,036	51.5%	1	0.0%	9	0.4%	0	0.0%	370	18.4%
1990	2,241	2,008	1,344	66.9%	664	33.1%	2,022	630	31.2%	1,045	51.7%	0	0.0%	10	0.5%	1	0.0%	336	16.6%
1991	2,164	1,975	1,365	69.1%	610	30.9%	1,977	656	33.2%	1,027	51.9%	1	0.1%	8	0.4%	0	0.0%	285	14.4%
1992	2,384	2,032	1,443	71.0%	589	29.0%	2,035	669	32.9%	1,080	53.1%	0	0.0%	15	0.7%	0	0.0%	271	13.3%
1993	2,491	2,069	1,505	72.7%	564	27.3%	2,071	729	35.2%	1,076	52.0%	0	0.0%	19	0.9%	0	0.0%	247	11.9%
1994	2,437	2,034	1,503	73.9%	531	26.1%	2,036	737	36.2%	1,052	51.7%	0	0.0%	17	0.8%	0	0.0%	230	11.3%
1995	2,613	2,060	1,569	76.2%	491	23.8%	2,072	776	37.5%	1,057	51.0%	1	0.0%	22	1.1%	2	0.1%	214	10.3%
1996	2,130	1,949	1,534	78.7%	415	21.3%	1,965	776	39.5%	1,010	51.4%	0	0.0%	4	0.2%	0	0.0%	175	8.9%
1997	2,106	1,945	1,546	79.5%	399	20.5%	1,958	795	40.6%	996	50.9%	1	0.1%	9	0.5%	0	0.0%	157	8.0%
1998	2,077	1,909	1,526	79.9%	383	20.1%	1,919	770	40.1%	987	51.4%	0	0.0%	7	0.4%	0	0.0%	155	8.1%
1999	2,154	1,931	1,542	79.9%	389	20.1%	1,944	796	40.9%	992	51.0%	0	0.0%	10	0.5%	1	0.1%	145	7.5%
2000	2,138	1,885	1,520	80.6%	365	19.4%	1,897	795	41.9%	974	51.3%	0	0.0%	5	0.3%	1	0.1%	122	6.4%
2001	1,876	1,614	1,302	80.7%	312	19.3%	1,621	691	42.6%	834	51.4%	0	0.0%	4	0.2%	0	0.0%	92	5.7%
2002	1,355	1,199	959	80.0%	240	20.0%	1,207	537	44.5%	604	50.0%	0	0.0%	5	0.4%	1	0.1%	60	5.0%
2003	1,720	1,467	1,174	80.0%	293	20.0%	1,477	661	44.8%	748	50.6%	0	0.0%	4	0.3%	1	0.1%	63	4.3%
2004	1,606	1,393	1,149	82.5%	244	17.5%	1,403	629	44.8%	713	50.8%	0	0.0%	5	0.4%	1	0.1%	55	3.9%
2005	1,736	1,427	1,169	81.9%	258	18.1%	1,439	658	45.7%	723	50.2%	0	0.0%	7	0.5%	1	0.1%	50	3.5%
2006	1,779	1,483	1,221	82.3%	262	17.7%	1,494	705	47.2%	739	49.5%	0	0.0%	5	0.3%	2	0.1%	43	2.9%
2007	1,714	1,434	1,204	84.0%	230	16.0%	1,443	688	47.7%	713	49.4%	0	0.0%	2	0.1%	1	0.1%	39	2.7%
2008	1,612	1,411	1,197	84.8%	214	15.2%	1,420	681	48.0%	697	49.1%	0	0.0%	4	0.3%	1	0.1%	37	2.6%
2009	1,601	1,392	1,197	86.0%	195	14.0%	1,400	677	48.4%	684	48.9%	0	0.0%	4	0.3%	0	0.0%	35	2.5%
2010	1,445	1,435	1,225	85.4%	210	14.6%	1,442	706	49.0%	700	48.5%	0	0.0%	5	0.3%	0	0.0%	31	2.1%
2011	1,484	1,469	1,268	86.3%	201	13.7%	1,476	718	48.6%	728	49.3%	0	0.0%	1	0.1%	0	0.0%	29	2.0%
2012	1,450	1,438	1,260	87.6%	178	12.4%	1,444	721	49.9%	698	48.3%	0	0.0%	2	0.1%	0	0.0%	23	1.6%
2013	1,413	1,407	1,241	88.2%	166	11.8%	1,412	707	50.1%	680	48.2%	0	0.0%	1	0.1%	0	0.0%	24	1.7%
2014	1,475	1,468	1,296	88.3%	172	11.7%	1,474	742	50.3%	705	47.8%	0	0.0%	1	0.1%	0	0.0%	26	1.8%
2015	1,493	1,475	1,314	89.1%	161	10.9%	1,480	747	50.5%	711	48.0%	0	0.0%	1	0.1%	0	0.0%	21	1.4%
2016	1,386	1,372	1,237	90.2%	135	9.8%	1,376	715	52.0%	646	46.9%	0	0.0%	1	0.1%	0	0.0%	14	1.0%
2017	1,396	1,389	1,269	91.4%	120	8.6%	1,392	722	51.9%	659	47.3%	0	0.0%	1	0.1%	0	0.0%	10	0.7%
2018	1,387	1,381	1,270	92.0%	111	8.0%	1,384	729	52.7%	646	46.7%	0	0.0%	0	0.0%	0	0.0%	9	0.7%
2019	1,416	1,409	1,303	92.5%	106	7.5%	1,413	753	53.3%	649	45.9%	0	0.0%	2	0.1%	0	0.0%	9	0.6%
2020	1,350	1,341	1,244	92.8%	97	7.2%	1,345	747	55.5%	592	44.0%	0	0.0%	0	0.0%	0	0.0%	6	0.4%
2021	1,360	1,352	1,263	93.4%	89	6.6%	1,355	763	56.3%	586	43.2%	0	0.0%	2	0.1%	0	0.0%	4	0.3%
2022	1,383	1,374	1,287	93.7%	87	6.3%	1,379	806	58.4%	570	41.3%	0	0.0%	0	0.0%	0	0.0%	3	0.2%
2023	1,312	1,301	1,231	94.6%	70	5.4%	1,308	779	59.6%	528	40.4%	0	0.0%	0	0.0%	0	0.0%	1	0.1%
2024	1,236	1,223	1,157	94.6%	66	5.4%	1,230	755	61.4%	475	38.6%	0	0.0%	0	0.0%	0	0.0%	0	0.0%

- Total includes every vessel used in this fishery from 1978 to 2024.

Participation and Earnings

Earnings are estimated from weighted average ex-vessel prices, and as noted earlier, largely stem from the ADF&G Commercial Operators Annual Report and fish ticket values. Earnings shown in Figure 1-5 are for both nominal and real dollars using the 2025 Consumer Price Index from the U.S. Bureau of Labor Statistics.

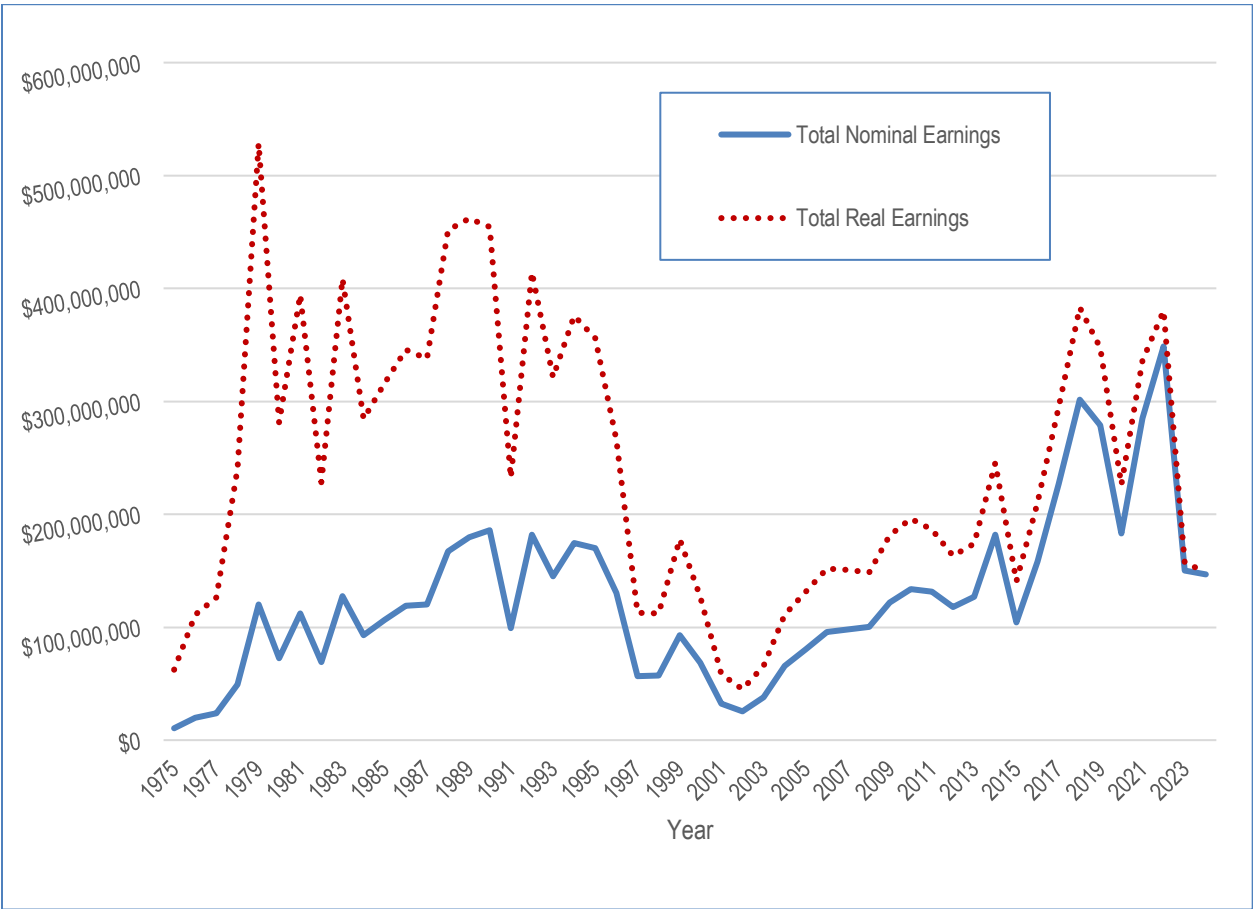
Permit counts include interim-entry permits and permanent permits. Interim-entry permits are issued to individuals during the period when their applications for permanent permits are in adjudication. The last year an interim-entry permit was held for the Bristol Bay salmon drift gillnet fishery was in 2007. Some individuals made landings on both an interim-entry permit and subsequently on their newly issued permanent permit in the same year; for these instances, only the permanent permit is counted in this report.

Table 1-13 reports the number of permits issued, permits and vessels with landings, and estimated gross earnings in the Bristol Bay salmon drift gillnet fishery from 1975 to 2024. Note that the figures by permit in this table span the entire year, regardless of who held the permit or how many times the permit was transferred.

Table 1-14 reports the number of permit holders (people) and estimated real (inflation-adjusted) gross earnings by each resident type.

Table 1-15 breaks out participation and earnings by ADF&G salmon management area with real ex-vessel values. Note that some permits are used to record landings in more than one district.

Figure 1-5. Estimated Nominal and Real Total Gross Earnings in the Bristol Bay Salmon Drift Gillnet Fishery



- Real earnings are adjusted for inflation using the 2025 U.S. Bureau of Labor Statistics Consumer Price Index.

*Bristol Bay Salmon Drift Gillnet Fishery (S03T)***Table 1-13. Estimated Total Gross Earnings (Real and Nominal) for the Bristol Bay Salmon Drift Gillnet Fishery, With Average Earnings (Real) by Permit and Vessel, 1975-2024**

Year	Permits Issued	Total Nominal Earnings	Total Real Earnings	Permits with Landings	Average Real Earnings per Permit	Vessels with Landings	Average Real Earnings per Vessel
1975	1,821	\$10,529,539	\$62,421,211	1,249	\$49,977	1,370	\$45,563
1976	1,705	\$19,859,648	\$111,305,385	1,356	\$82,084	1,427	\$78,000
1977	1,724	\$24,058,389	\$126,643,359	1,359	\$93,189	1,451	\$87,280
1978	1,771	\$49,183,042	\$240,544,423	1,575	\$152,727	1,587	\$151,572
1979	1,800	\$120,196,589	\$528,396,224	1,714	\$308,283	1,750	\$301,941
1980	1,827	\$72,583,988	\$281,132,303	1,764	\$159,372	1,848	\$152,128
1981	1,827	\$112,487,059	\$394,717,090	1,785	\$221,130	1,816	\$217,355
1982	1,824	\$69,074,998	\$228,320,497	1,792	\$127,411	1,842	\$123,953
1983	1,821	\$127,608,313	\$408,882,555	1,797	\$227,536	1,826	\$223,923
1984	1,818	\$92,757,369	\$284,774,398	1,804	\$157,857	1,863	\$152,858
1985	1,834	\$106,696,595	\$316,408,753	1,815	\$174,330	1,849	\$171,124
1986	1,838	\$118,928,486	\$345,951,074	1,823	\$189,770	1,852	\$186,799
1987	1,837	\$120,369,596	\$338,045,972	1,824	\$185,332	1,862	\$181,550
1988	1,839	\$167,443,171	\$451,728,188	1,837	\$245,905	1,869	\$241,695
1989	1,867	\$179,466,290	\$462,035,964	1,855	\$249,076	1,895	\$243,818
1990	1,878	\$186,085,765	\$454,440,046	1,869	\$243,146	1,907	\$238,301
1991	1,881	\$99,230,409	\$232,526,616	1,873	\$124,147	1,896	\$122,641
1992	1,884	\$182,217,012	\$414,397,929	1,879	\$220,542	1,915	\$216,396
1993	1,886	\$145,375,898	\$321,077,208	1,875	\$171,241	1,922	\$167,054
1994	1,887	\$174,569,899	\$375,796,622	1,865	\$201,500	1,890	\$198,834
1995	1,888	\$170,029,398	\$356,041,560	1,882	\$189,183	1,917	\$185,729
1996	1,891	\$130,612,195	\$265,691,326	1,884	\$141,025	1,921	\$138,309
1997	1,899	\$56,691,067	\$112,690,502	1,875	\$60,102	1,900	\$59,311
1998	1,899	\$57,202,946	\$111,974,766	1,858	\$60,266	1,869	\$59,912
1999	1,898	\$92,895,948	\$177,942,188	1,847	\$96,341	1,873	\$95,004
2000	1,890	\$68,412,338	\$126,774,904	1,823	\$69,542	1,841	\$68,862
2001	1,877	\$32,414,815	\$58,421,222	1,566	\$37,306	1,570	\$37,211
2002	1,858	\$25,432,417	\$45,117,108	1,184	\$38,106	1,176	\$38,365
2003	1,826	\$37,999,418	\$65,898,590	1,424	\$46,277	1,407	\$46,836
2004	1,813	\$65,619,709	\$110,838,250	1,465	\$75,658	1,372	\$80,786
2005	1,816	\$80,565,512	\$131,652,103	1,542	\$85,378	1,387	\$94,919
2006	1,802	\$95,806,246	\$151,670,868	1,577	\$96,177	1,463	\$103,671
2007	1,834	\$97,949,220	\$150,734,055	1,633	\$92,305	1,403	\$107,437
2008	1,842	\$100,076,444	\$148,353,320	1,645	\$90,184	1,396	\$106,270
2009	1,838	\$121,778,310	\$181,096,525	1,628	\$111,239	1,356	\$133,552
2010	1,850	\$133,838,931	\$195,833,124	1,731	\$113,133	1,407	\$139,185
2011	1,856	\$131,338,245	\$186,316,435	1,758	\$105,982	1,444	\$129,028
2012	1,855	\$117,646,367	\$163,504,921	1,743	\$93,807	1,433	\$114,100
2013	1,852	\$127,214,958	\$174,259,050	1,723	\$101,137	1,408	\$123,764
2014	1,853	\$182,117,144	\$245,493,911	1,760	\$139,485	1,464	\$167,687
2015	1,855	\$104,518,582	\$140,713,366	1,757	\$80,087	1,478	\$95,205
2016	1,855	\$158,030,886	\$210,102,063	1,715	\$122,508	1,372	\$153,136
2017	1,854	\$226,462,821	\$294,786,654	1,737	\$169,710	1,386	\$212,689
2018	1,851	\$301,399,886	\$383,018,975	1,749	\$218,993	1,382	\$277,148
2019	1,858	\$278,580,840	\$347,696,747	1,776	\$195,775	1,416	\$245,549
2020	1,858	\$183,296,803	\$225,949,969	1,725	\$130,985	1,350	\$167,370
2021	1,856	\$285,323,480	\$335,996,930	1,754	\$191,560	1,360	\$247,057
2022	1,859	\$348,694,420	\$380,216,395	1,777	\$213,965	1,383	\$274,921
2023	1,859	\$149,983,389	\$157,062,605	1,720	\$91,315	1,312	\$119,712
2024	1,853	\$146,777,308	\$149,301,878	1,685	\$88,606	1,236	\$120,794

- Adjusted for inflation to 2025 dollars using U.S. Bureau of Labor Statistics Consumer Price Index.
- Counts will differ from CFEC on-line Basic Information Tables where the on-line data does not account for the combination of interim-entry permits that were issued as permanent permits in the same year.

Bristol Bay Salmon Drift Gillnet Fishery (S03T)

Table 1-14. Estimated Real Gross Earnings for Permit Holders in the Bristol Bay Salmon Drift Gillnet Fishery by Resident Type, 1975-2024

Year	Local Earnings			Nonlocal Earnings			Nonresident Earnings			Total Earnings		
	People	Total	Average	People	Total	Average	People	Total	Average	People	Total	Average
1975	465	\$16,884,891	\$36,312	217	\$10,256,726	\$47,266	570	\$35,279,594	\$61,894	1,252	\$62,421,211	\$49,857
1976	504	\$41,697,668	\$82,733	227	\$16,807,272	\$74,041	631	\$52,800,445	\$83,677	1,362	\$111,305,385	\$81,722
1977	529	\$44,719,140	\$84,535	229	\$20,653,144	\$90,188	605	\$61,271,076	\$101,275	1,363	\$126,643,359	\$92,915
1978	602	\$87,815,389	\$145,873	297	\$39,312,808	\$132,366	688	\$113,416,225	\$164,849	1,587	\$240,544,423	\$151,572
1979	634	\$132,226,804	\$208,560	351	\$100,782,694	\$287,130	746	\$295,386,726	\$395,961	1,731	\$528,396,224	\$305,255
1980	645	\$78,351,965	\$121,476	368	\$61,571,256	\$167,313	769	\$141,209,081	\$183,627	1,782	\$281,132,303	\$157,762
1981	651	\$112,188,676	\$172,333	388	\$85,328,334	\$219,918	773	\$197,200,080	\$255,110	1,812	\$394,717,090	\$217,835
1982	632	\$66,319,188	\$104,935	405	\$60,113,866	\$148,429	776	\$101,887,444	\$131,298	1,813	\$228,320,497	\$125,935
1983	628	\$96,048,832	\$152,944	435	\$100,711,815	\$231,521	755	\$212,121,908	\$280,956	1,818	\$408,882,555	\$224,908
1984	628	\$72,665,229	\$115,709	432	\$70,990,367	\$164,330	778	\$141,118,802	\$181,387	1,838	\$284,774,398	\$154,937
1985	612	\$75,201,204	\$122,878	442	\$85,427,427	\$193,275	780	\$155,780,121	\$199,718	1,834	\$316,408,753	\$172,524
1986	596	\$91,731,774	\$153,912	469	\$91,459,518	\$195,010	796	\$162,759,781	\$204,472	1,861	\$345,951,074	\$185,895
1987	606	\$89,700,731	\$148,021	463	\$88,169,719	\$190,431	794	\$160,175,522	\$201,732	1,863	\$338,045,972	\$181,452
1988	580	\$119,246,815	\$205,598	470	\$120,324,805	\$256,010	824	\$212,156,568	\$257,472	1,874	\$451,728,188	\$241,050
1989	576	\$108,602,546	\$188,546	460	\$111,220,540	\$241,784	853	\$242,212,878	\$283,954	1,889	\$462,035,964	\$244,593
1990	553	\$95,885,929	\$173,392	487	\$108,732,116	\$223,269	868	\$249,822,001	\$287,813	1,908	\$454,440,046	\$238,176
1991	538	\$49,284,917	\$91,608	478	\$59,903,652	\$125,321	884	\$123,338,047	\$139,523	1,900	\$232,526,616	\$122,382
1992	541	\$79,330,533	\$146,637	465	\$102,352,395	\$220,113	919	\$232,715,002	\$253,226	1,925	\$414,397,929	\$215,272
1993	508	\$67,792,916	\$133,451	466	\$77,569,764	\$166,459	957	\$175,714,528	\$183,610	1,931	\$321,077,208	\$166,275
1994	503	\$66,733,190	\$132,670	471	\$90,651,486	\$192,466	950	\$218,411,946	\$229,907	1,924	\$375,796,622	\$195,320
1995	469	\$62,564,829	\$133,400	483	\$83,604,785	\$173,095	976	\$209,871,946	\$215,033	1,928	\$356,041,560	\$184,669
1996	454	\$49,685,294	\$109,439	473	\$61,331,347	\$129,665	995	\$154,674,685	\$155,452	1,922	\$265,691,326	\$138,237
1997	460	\$19,736,830	\$42,906	465	\$28,836,055	\$62,013	989	\$64,117,618	\$64,831	1,914	\$112,690,502	\$58,877
1998	460	\$23,629,577	\$51,369	446	\$25,966,827	\$58,222	981	\$62,378,363	\$63,587	1,887	\$111,974,766	\$59,340
1999	455	\$36,784,439	\$80,845	446	\$41,514,520	\$93,082	975	\$99,643,230	\$102,198	1,876	\$177,942,188	\$94,852
2000	435	\$26,001,461	\$59,773	451	\$29,115,602	\$64,558	957	\$71,657,841	\$74,878	1,843	\$126,774,904	\$68,787
2001	402	\$11,313,477	\$28,143	377	\$12,605,666	\$33,437	798	\$34,502,078	\$43,236	1,577	\$58,421,222	\$37,046
2002	311	\$6,222,436	\$20,008	266	\$10,803,117	\$40,613	610	\$28,091,555	\$46,052	1,187	\$45,117,108	\$38,009
2003	365	\$13,634,972	\$37,356	327	\$14,589,036	\$44,615	740	\$37,674,582	\$50,912	1,432	\$65,898,590	\$46,019
2004	355	\$18,366,966	\$51,738	341	\$25,705,057	\$75,381	775	\$66,766,227	\$86,150	1,471	\$110,838,250	\$75,349
2005	361	\$21,285,941	\$58,964	372	\$30,166,654	\$81,093	823	\$80,199,508	\$97,448	1,556	\$131,652,103	\$84,609
2006	362	\$23,713,499	\$65,507	388	\$37,024,128	\$95,423	845	\$90,933,241	\$107,613	1,595	\$151,670,868	\$95,091
2007	342	\$22,961,721	\$67,140	412	\$36,255,982	\$88,000	897	\$91,516,352	\$102,025	1,651	\$150,734,055	\$91,299
2008	341	\$20,807,125	\$61,018	429	\$35,802,871	\$83,457	896	\$91,743,325	\$102,392	1,665	\$148,353,320	\$89,101
2009	308	\$23,060,177	\$74,871	386	\$40,881,092	\$105,910	950	\$117,155,256	\$123,321	1,642	\$181,096,525	\$110,290
2010	321	\$26,024,587	\$81,073	429	\$46,455,827	\$108,289	1007	\$123,352,709	\$122,495	1,757	\$195,833,124	\$111,459
2011	331	\$23,568,507	\$71,204	446	\$43,678,209	\$97,933	1010	\$119,069,719	\$117,891	1,785	\$186,316,435	\$104,379
2012	327	\$20,295,410	\$62,065	434	\$37,484,337	\$86,369	1004	\$105,725,174	\$105,304	1,764	\$163,504,921	\$92,690
2013	317	\$21,649,238	\$68,294	448	\$43,290,846	\$96,631	974	\$109,318,966	\$112,237	1,738	\$174,259,050	\$100,264
2014	320	\$28,637,415	\$89,492	467	\$62,882,683	\$134,652	992	\$153,973,812	\$155,216	1,778	\$245,493,911	\$138,073
2015	311	\$15,498,280	\$49,834	447	\$35,511,660	\$79,444	1018	\$89,703,426	\$88,117	1,775	\$140,713,366	\$79,275
2016	297	\$23,164,385	\$77,995	437	\$55,084,900	\$126,052	1000	\$131,852,778	\$131,853	1,734	\$210,102,063	\$121,166
2017	306	\$32,560,544	\$106,407	453	\$79,109,239	\$174,634	1003	\$183,116,871	\$182,569	1,762	\$294,786,654	\$167,302
2018	303	\$44,650,907	\$147,363	463	\$103,881,126	\$224,365	1011	\$234,486,941	\$231,936	1,777	\$383,018,975	\$215,542
2019	285	\$35,779,137	\$125,541	488	\$95,764,234	\$196,238	1022	\$216,153,376	\$211,500	1,795	\$347,696,747	\$193,703
2020	256	\$20,149,392	\$78,709	481	\$63,558,114	\$132,137	999	\$142,242,462	\$142,385	1,736	\$225,949,969	\$130,156
2021	252	\$32,070,174	\$127,263	497	\$103,945,295	\$209,145	1021	\$199,981,461	\$195,868	1,770	\$335,996,930	\$189,829
2022	250	\$33,406,330	\$133,625	530	\$114,028,536	\$215,148	1009	\$232,781,529	\$230,705	1,789	\$380,216,395	\$212,530
2023	233	\$12,859,620	\$55,192	515	\$48,865,367	\$94,884	982	\$95,337,619	\$97,085	1,730	\$157,062,605	\$90,788
2024	221	\$14,496,579	\$65,595	501	\$48,887,794	\$97,580	975	\$85,917,504	\$88,121	1,697	\$149,301,878	\$87,980

- Adjusted for inflation to 2025 dollars using U.S. Bureau of Labor Statistics Consumer Price Index.
- Counts will differ from CFEC on-line Basic Information Tables where the on-line data does not account for the combination of interim-entry permits that were issued as permanent permits in the same year. Note that these counts are for individuals, not permits.

Bristol Bay Salmon Drift Gillnet Fishery (S03T)

Table 1-15. Gross Real Earnings for the Bristol Bay Salmon Drift Gillnet Fishery by ADF&G Salmon District, 1975 to 2024

Year	Togiak		Nushagak		Naknek Kvichak		Egegik		Ugashik		Other		Total	
	Vessels	Gross Earnings	Vessels	Gross Earnings	Vessels	Gross Earnings	Vessels	Gross Earnings	Vessels	Gross Earnings	Vessels	Gross Earnings	Vessels	Gross Earnings
1975	189	\$4,577,779	495	\$10,096,356	779	\$35,571,942	265	\$11,814,800	41	\$253,238	8	\$107,097	1,370	\$62,421,211
1976	161	\$8,923,273	519	\$36,041,812	731	\$43,520,895	263	\$19,777,758	82	\$2,887,699	10	\$153,947	1,427	\$111,305,385
1977	173	\$13,190,804	538	\$34,680,732	649	\$44,810,680	367	\$31,529,112	48	\$2,021,189	20	\$410,842	1,451	\$126,643,359
1978	190	\$20,145,976	740	\$97,394,158	820	\$97,785,788	400	\$23,341,824	56	\$699,160	26	\$1,177,517	1,587	\$240,544,423
1979	196	\$15,050,737	863	\$88,949,481	1,094	\$350,364,977	335	\$48,088,691	118	\$9,718,541	821	\$16,223,797	1,750	\$528,396,224
1980	263	\$13,304,948	1,040	\$69,500,101	1,057	\$149,914,489	295	\$20,793,998	212	\$9,685,797	328	\$17,932,970	1,848	\$281,132,303
1981	294	\$13,035,707	936	\$131,345,425	998	\$162,253,758	359	\$55,347,315	283	\$32,173,421	17	\$561,464	1,816	\$394,717,090
1982	327	\$14,190,114	1,097	\$103,122,182	867	\$63,155,092	429	\$30,953,494	269	\$15,908,934	23	\$990,682	1,842	\$228,320,497
1983	298	\$10,271,024	975	\$62,841,536	1,068	\$226,888,888	488	\$71,017,251	360	\$37,585,778	17	\$278,079	1,826	\$408,882,555
1984	314	\$10,078,777	914	\$37,101,402	1,127	\$148,412,474	593	\$57,518,957	351	\$30,480,342	44	\$1,182,446	1,863	\$284,774,398
1985	157	\$6,265,992	616	\$16,702,912	1,175	\$100,770,007	946	\$101,079,010	769	\$90,959,607	44	\$631,225	1,849	\$316,408,753
1986	162	\$8,928,302	830	\$57,179,532	734	\$52,285,380	847	\$108,318,000	828	\$118,798,563	38	\$441,297	1,852	\$345,951,074
1987	149	\$9,412,597	640	\$64,004,713	1,076	\$100,018,968	940	\$114,212,521	633	\$49,035,666	49	\$1,361,507	1,862	\$338,045,972
1988	331	\$29,211,001	536	\$50,966,303	1,032	\$108,333,569	1,010	\$210,302,809	577	\$49,842,145	64	\$3,072,361	1,869	\$451,728,188
1989	158	\$2,869,774	446	\$34,012,737	1,227	\$224,395,544	998	\$148,826,063	559	\$50,489,553	66	\$1,442,294	1,895	\$462,035,964
1990	131	\$3,032,557	457	\$38,548,369	1,402	\$236,318,485	981	\$144,660,195	424	\$30,618,309	64	\$1,262,132	1,907	\$454,440,046
1991	213	\$4,574,977	463	\$40,823,782	1,092	\$97,389,154	672	\$61,829,310	449	\$27,064,661	69	\$844,733	1,896	\$232,526,616
1992	285	\$8,326,293	527	\$30,810,636	982	\$123,315,634	958	\$206,032,911	518	\$44,824,491	103	\$1,087,963	1,915	\$414,397,929
1993	163	\$3,619,963	535	\$38,290,261	843	\$66,905,603	1,207	\$178,013,783	610	\$33,791,366	50	\$456,233	1,922	\$321,077,208
1994	179	\$4,529,169	530	\$33,988,282	1,137	\$168,905,766	1,106	\$117,257,608	480	\$49,725,040	77	\$1,390,756	1,890	\$375,796,622
1995	173	\$4,138,918	522	\$32,591,598	1,180	\$161,407,108	943	\$118,083,550	746	\$39,468,056	82	\$352,330	1,917	\$356,041,560
1996	152	\$2,967,396	633	\$48,301,225	765	\$71,690,856	951	\$99,251,684	626	\$43,218,383	33	\$261,782	1,921	\$265,691,326
1997	66	\$740,433	622	\$20,478,424	554	\$4,706,753	965	\$72,510,090	477	\$13,855,874	42	\$398,929	1,900	\$112,690,502
1998	66	\$1,857,356	685	\$30,898,631	1,055	\$28,665,058	954	\$41,501,456	395	\$8,688,208	62	\$364,057	1,869	\$111,974,766
1999	125	\$2,235,805	566	\$39,058,677	1,104	\$67,395,541	796	\$52,123,083	455	\$17,102,769	22	\$26,313	1,873	\$177,942,188
2000	191	\$4,056,470	690	\$37,546,386	803	\$29,302,620	827	\$45,169,715	520	\$10,597,891	27	\$101,822	1,841	\$126,774,904
2001	163	\$3,181,558	802	\$20,030,896	558	\$20,923,868	649	\$12,360,511	286	\$1,922,966	4	\$1,422	1,570	\$58,421,222
2002	96	\$934,420	488	\$11,764,933	338	\$4,944,330	422	\$20,243,010	377	Confidential		Confidential	1,176	\$45,117,108
2003	138	\$2,696,157	617	\$32,598,508	509	\$12,305,841	559	\$9,852,771	436	\$8,440,932	4	\$4,381	1,407	\$65,898,590
2004	99	\$1,681,281	433	\$27,764,251	459	\$18,543,702	603	\$40,844,084	349	\$13,760,267	887	\$8,244,665	1,372	\$110,838,250
2005	91	\$2,136,544	652	\$40,448,826	654	\$34,933,973	609	\$41,547,947	357	\$12,540,563	12	\$44,251	1,387	\$131,652,103
2006	84	\$2,859,616	670	\$59,186,885	786	\$37,491,311	528	\$38,835,014	242	\$13,224,252	6	\$73,789	1,463	\$151,670,868
2007	112	\$3,840,056	645	\$40,926,172	702	\$44,075,358	499	\$33,489,669	415	\$28,402,800	.	.	1,403	\$150,734,055
2008	135	\$3,428,310	518	\$36,010,255	770	\$55,693,326	391	\$39,327,102	273	\$13,894,328	.	.	1,396	\$148,353,320
2009	125	\$3,115,400	463	\$44,243,605	635	\$48,752,086	537	\$68,920,263	275	\$16,065,171	.	.	1,356	\$181,096,525
2010	94	\$4,218,106	532	\$54,864,234	860	\$72,771,233	655	\$33,560,121	346	Confidential		Confidential	1,407	\$195,833,124

-continued-

Bristol Bay Salmon Drift Gillnet Fishery (S03T)

Year	Togiak		Nushagak		Naknek Kvichak		Egegik		Ugashik		Other		Total	
	Vessels	Gross Earnings	Vessels	Gross Earnings	Vessels	Gross Earnings	Vessels	Gross Earnings	Vessels	Gross Earnings	Vessels	Gross Earnings	Vessels	Gross Earnings
2011	136	\$5,638,073	420	\$39,269,740	882	\$77,692,427	689	\$40,496,405	379	\$23,219,790	.	.	1,444	\$186,316,435
2012	118	\$5,548,761	456	\$17,985,250	845	\$81,563,911	470	\$38,183,522	329	\$20,223,477	.	.	1,433	\$163,504,921
2013	114	\$4,869,421	385	\$34,502,912	855	\$53,978,590	722	\$54,026,296	351	\$26,881,831	.	.	1,408	\$174,259,050
2014	94	\$3,728,062	537	\$52,145,667	976	\$115,933,762	730	\$61,341,069	280	Confidential	Confidential		1,464	\$245,493,911
2015	80	\$1,353,840	414	\$19,212,821	904	\$65,971,378	786	\$30,479,784	275	\$23,695,543	.	.	1,478	\$140,713,366
2016	56	\$2,560,332	476	\$38,182,660	808	\$79,618,125	380	\$47,525,443	299	\$42,215,503	.	.	1,372	\$210,102,063
2017	55	\$2,943,914	566	\$86,775,642	689	\$57,121,860	528	\$97,833,535	411	\$50,111,703	.	.	1,386	\$294,786,654
2018	57	\$5,740,062	884	\$218,610,142	834	\$83,321,703	433	\$47,731,220	242	\$27,615,848	.	.	1,382	\$383,018,975
2019	81	\$6,386,321	762	\$122,870,806	818	\$90,857,094	688	\$120,116,005	313	\$7,466,521	.	.	1,416	\$347,696,747
2020	65	\$1,838,537	613	\$42,104,280	693	\$84,037,085	560	\$83,532,337	246	\$14,437,730	.	.	1,350	\$225,949,969
2021	70	\$4,278,311	717	\$143,351,753	789	\$72,574,887	522	\$69,118,963	400	\$46,673,016	.	.	1,360	\$335,996,930
2022	74	\$3,168,276	826	\$145,986,734	783	\$87,058,285	477	\$97,922,047	288	\$46,081,053	.	.	1,383	\$380,216,395
2023	51	\$1,070,371	595	\$43,393,499	779	\$53,162,128	555	\$50,199,231	280	\$9,237,377	.	.	1,312	\$157,062,605
2024	76	\$2,340,341	588	\$52,761,090	785	\$47,089,539	403	\$24,734,278	305	Confidential	Confidential		1,236	\$149,301,878

- Adjusted for inflation to 2025 dollars using U.S. Bureau of Labor Statistics Consumer Price Index.
- Some Permits are used to record landings in more than one district.

Chapter 2 Bristol Bay Salmon Set Gillnet Fishery

S04T Permit Holdings

Limited entry permits for the Bristol Bay salmon set gillnet fishery (S04T permits) were issued starting in 1975. CFEC has issued 1,041 S04T permits. Table 2-1 indicates the initial distribution and historical net changes in permit holdings for the fishery. Of this total, Alaska Locals received 63.4% (660/1,041) of the permits, Nonlocal Alaskans received 21.8% (227/1,041) of the permits, and Nonresidents received 14.8% (154/1,041). Eight hundred eighty-three of the S04T permits were issued as transferable permits, and the remaining 158 permits were issued as non-transferable permits.

Table 2-1. Initial Issuance and Year-end 2024 Totals of Bristol Bay Salmon Set Gillnet Permits, With Net Changes Due to Permit Transfers, Migrations, and Cancellations, by Resident Type

Residency	Initial Issues		Transfers		Migrations		Cancellations		2024 Year End	
	Count	Percentage	Count	Percent Change	Count	Percent Change	Count	Percent Change	Count	Percent Change
Local	660	63.4%	-145	-22.0%	-170	-25.8%	44	6.7%	301	31.6%
Nonlocal	227	21.8%	16	7.0%	68	30.0%	28	12.3%	283	29.7%
Nonresident	154	14.8%	129	83.8%	102	66.2%	17	11.0%	368	38.7%
Total	1041	100.0%	0	0.00%	0	0.0%	89	8.55%	952	100.0%

The number of permits held by each resident type can change for three reasons: permits can be transferred to other resident types (transfer); permit holders can move from one location to another (migration); or permits can be cancelled, such as when a permit holder does not pay the renewal fee for two consecutive years. This table indicates the extent to which these factors have contributed to net changes in permit holdings in this fishery.

Transfers of S04T Permits

Under the Limited Entry Act's terms of free transferability, permits may be sold, traded, given away, or inherited. CFEC requires the completion of a survey with each transfer.⁴ The surveys provide information such as transfer acquisition methods, the relationship between individuals in the transaction, and the sale amount for instances when the permit is sold.

Table 2-2. Transfer Acquisition Methods for Bristol Bay Salmon Set Gillnet Permits, 1980-2024

Acquisition Method	Bristol Bay Salmon Set Net		Combined Bristol Bay Salmon		Statewide Salmon Set Gillnet		All Fisheries Statewide	
	Count	Percent	Count	Percent	Count	Percent	Count	Percent
Gift	2,067	49.8%	4,345	39.5%	7,074	51.6%	14,341	33.0%
Sale	1,820	43.9%	5,878	53.4%	5,213	38.0%	25,299	58.2%
Trade	26	0.6%	68	0.6%	97	0.7%	541	1.2%
Other	235	5.7%	718	6.5%	1,329	9.7%	3,294	7.6%
Total	4,148	100.0%	11,009	100.0%	13,713	100.0%	43,475	100.0%

Table 2-2 compares the transfer acquisition methods for the S04T permits, combined Bristol Bay salmon permit types, all statewide salmon set gillnet permits, and all limited entry permits between 1980 and 2024. About half of all S04T transfers were gifts (49.8% or 2,067), almost half were sales (43.9% or 1,820), and a

⁴ CFEC implemented the transfer survey in 1980.

Bristol Bay Salmon Set Gillnet (S04T)

smaller percentage were trades (0.6% or 26) or other (5.7% or 235). The annual acquisition methods for S04T permits can be viewed in a different publication.⁵

Table 2-3. Relationships of Transferor to Transfer Recipients for Bristol Bay Salmon Set Gillnet Permits, 1980-2024

Relationship	Bristol Bay Salmon Set Net		Combined Bristol Bay Salmon		Statewide Salmon Set Gillnet		All Fisheries Statewide	
	Count	Percent	Count	Percent	Count	Percent	Count	Percent
Business Partner/Friend	983	23.7%	2,179	19.8%	2,807	20.5%	8,189	18.8%
Member of Immediate Family	1,655	39.9%	3,841	34.9%	6,566	47.9%	14,586	33.6%
Other Relative	291	7.0%	594	5.4%	948	6.9%	1,938	4.5%
Other	1,219	29.4%	4,395	39.9%	3,392	24.7%	18,762	43.2%
Total	4,148	100.0%	11,009	100.0%	13,713	100.0%	43,475	100.0%

Table 2-3 shows the relationships between the transferors and transfer recipients for S04T permits and compares S04T permit transfers with the combined Bristol Bay salmon permit types, all statewide salmon set gillnet permits, and all limited entry permits from 1980 to 2024. Transfers within the family, both between immediate family members and other relatives, total 47.9% (1,946) of all permit transfers for S04T permits compared to 40.3% (4,435) combined Bristol Bay salmon permit types, 54.8% (7,514) for all salmon set gillnet permits statewide, and 38.1% (16,524) for all limited entry permits statewide.

Emergency Transfers of S04T Permits

Commercial landings can be made with either permanently-held permits or with permits held temporarily through emergency transfers. Emergency transfers (ET) of permits are granted if illness, disability, death, required military or government service or other unavoidable hardship of a temporary, unexpected, and unforeseen nature prevents the permanent permit holder from participating in the fishery. “Hardship” does not include the results of a permit holder’s own economic decisions, or the results of economic, biological or regulatory variables which are normally part of the risk of doing business as a fisherman. At the end of the year, ET permits automatically revert to the permanent permit holder.

Table 2-4 shows the total number of individuals who recorded landings each year, and of that group, the number of individuals who made landings with ET permits. Some individuals who made landings with ET permits also made landings with permanent permits in the same year.

⁵ See *Changes in the Distribution of Alaska’s Commercial Fisheries Entry Permits, 1975-2024*, CFEC Report No. 25-03N.

*Bristol Bay Salmon Set Gillnet (S04T)***Table 2-4. Use of Emergency Transfer Permits in the Bristol Bay Set Gillnet Fishery, 1975-2024**

Year	Individuals with Landings	ET Permit Holders with Landings	Rate ET	Year	Individuals with Landings	ET Permit Holders with Landings	Rate ET	Year	Individuals with Landings	ET Permit Holders with Landings	Rate ET
1975	429	10	2.3%	1992	1005	102	10.1%	2009	858	104	12.1%
1976	512	25	4.9%	1993	992	102	10.3%	2010	816	100	12.3%
1977	496	9	1.8%	1994	958	129	13.5%	2011	796	82	10.3%
1978	660	22	3.3%	1995	995	121	12.2%	2012	787	87	11.1%
1979	778	37	4.8%	1996	964	118	12.2%	2013	856	87	10.2%
1980	814	40	4.9%	1997	946	119	12.6%	2014	884	74	8.4%
1981	856	38	4.4%	1998	916	112	12.2%	2015	893	70	7.8%
1982	873	44	5.0%	1999	931	89	9.6%	2016	872	95	10.9%
1983	884	38	4.3%	2000	934	110	11.8%	2017	892	107	12.0%
1984	879	38	4.3%	2001	842	105	12.5%	2018	888	91	10.2%
1985	888	54	6.1%	2002	683	78	11.4%	2019	906	115	12.7%
1986	888	61	6.9%	2003	770	81	10.5%	2020	850	108	12.7%
1987	920	75	8.2%	2004	801	91	11.4%	2021	874	102	11.7%
1988	939	65	6.9%	2005	834	98	11.8%	2022	862	90	10.4%
1989	995	84	8.4%	2006	855	117	13.7%	2023	847	85	10.0%
1990	991	85	8.6%	2007	847	97	11.5%	2024	827	77	9.3%
1991	967	83	8.6%	2008	854	83	9.7%				

DNR Shore Fishery Leases in the Bristol Bay Set Gillnet Fishery

The Alaska Department of Natural Resources (DNR) administers a shore fishery lease program for the use of state owned and managed tidelands by CFEC set gillnet permit holders in Bristol Bay. A shore fishery lease grants permit holders the first right of priority to fish a tract of tidelands. Many permit holders obtain shore fishery leases, although a lease is not required in order to fish.

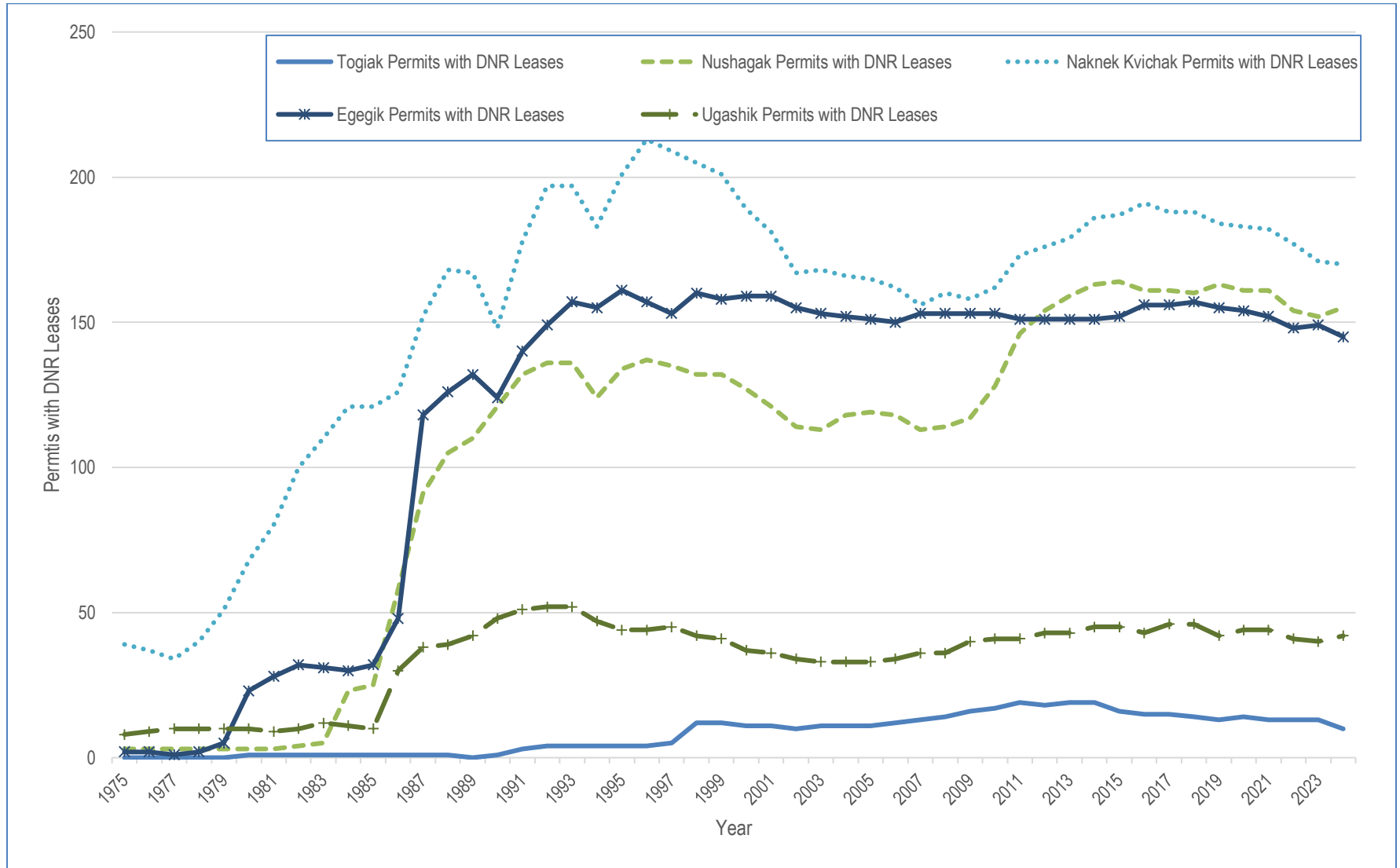
In Bristol Bay, the DNR shore fishery lease program allows a permit holder to maintain up to two tracts per permit.⁶ While some tracts are adjacent to one another, other tracts may be miles apart. Additional information regarding DNR shore fishery leases can be found in CFEC publication 25-04N.⁷

In Table 2-5, the total number of Bristol Bay set gillnet permits, permits with landings, and permits with a DNR shore fishery lease as of December 31 is reported by district. The total permits by district include permits that either had landings documented within the fishing district or had a DNR lease. While there are no restrictions as to which district an S04T permit can be used for fishing, S04T permit holders do not typically make landings in more than one district. The counts of permits with DNR shore fishery leases are depicted by district in Figure 2-1.

⁶ See 11 AAC 24.0331(b)(1)(D).

⁷ See *CFEC Salmon Set Gillnet Permits and DNR Shore Fishery Leases in Prince William Sound, Cook Inlet, Kodiak, Alaska Peninsula, and Bristol Bay 1975-2024*. CFEC Report No. 25-04N.

Figure 2-1. Count of Permits with DNR Shore Fishery Leases by District in Bristol Bay, 1975-2024



*Bristol Bay Salmon Set Gillnet (S04T)***Table 2-5. Bristol Bay Set Gillnet DNR Shore Fishery Leases by District**

Year	Togiak		Nushagak		Naknek Kvichak		Egegik		Ugashik	
	Permits with DNR Leases	Permits with Landings	Permits with DNR Leases	Permits with Landings	Permits with DNR Leases	Permits with Landings	Permits with DNR Leases	Permits with Landings	Permits with DNR Leases	Permits with Landings
1975	0	35	3	143	39	159	2	92	8	14
1976	0	36	3	178	37	197	2	97	9	20
1977	0	38	3	176	34	188	1	92	10	9
1978	0	51	3	229	40	273	2	131	10	6
1979	0	63	3	250	51	302	5	159	10	28
1980	1	63	3	250	68	348	23	183	10	31
1981	1	73	3	262	80	351	28	170	9	53
1982	1	72	4	263	100	349	32	173	10	57
1983	1	69	5	265	110	362	31	175	12	49
1984	1	76	23	264	121	346	30	188	11	63
1985	1	66	25	250	121	354	32	181	10	81
1986	1	103	58	282	126	302	48	190	30	82
1987	1	66	91	282	152	317	118	206	38	78
1988	1	121	105	282	168	353	126	193	39	70
1989	0	96	110	288	167	364	132	217	42	68
1990	1	76	121	342	148	439	124	215	48	64
1991	3	103	132	311	178	357	140	212	51	63
1992	4	116	136	297	197	349	149	205	52	67
1993	4	108	136	293	197	333	157	226	52	71
1994	4	115	124	295	183	322	155	224	47	68
1995	4	103	134	292	201	347	161	207	44	67
1996	4	111	137	277	213	348	157	203	44	53
1997	5	84	135	283	209	299	153	242	45	58
1998	12	82	132	276	205	298	160	209	42	52
1999	12	77	132	295	201	309	158	204	41	50
2000	11	86	127	298	189	322	159	203	37	54
2001	11	82	121	277	181	250	159	193	36	51
2002	10	59	114	215	167	230	155	147	34	35
2003	11	76	113	222	168	244	153	181	33	52
2004	11	72	118	231	166	277	152	178	33	44
2005	11	71	119	236	165	288	151	184	33	57
2006	12	76	118	231	162	303	150	185	34	56
2007	13	75	113	235	156	289	153	189	36	50
2008	14	73	114	252	160	283	153	189	36	53
2009	16	70	117	253	158	275	153	194	40	54
2010	17	76	128	273	162	280	153	189	41	53
2011	19	82	146	287	173	270	151	194	41	53
2012	18	86	154	279	176	270	151	200	43	57
2013	19	79	159	267	179	257	151	188	43	58
2014	19	78	163	275	186	270	151	198	45	74
2015	16	82	164	277	187	278	152	194	45	58
2016	15	78	161	280	191	264	156	189	43	52
2017	15	80	161	284	188	272	156	189	46	59
2018	14	78	160	299	188	268	157	183	46	56
2019	13	82	163	308	184	257	155	189	42	58
2020	14	76	161	287	183	247	154	181	44	52
2021	13	72	161	297	182	255	152	191	44	59
2022	13	71	154	298	177	246	148	179	41	62
2023	13	63	152	293	171	248	149	189	40	55
2024	10	57	155	288	170	250	145	179	42	48

Latent S04T Permits

CFEC regulations require individuals to renew their limited entry permits annually, regardless of whether they fish. Permits that are not used (don't record landings) each year are referred to herein as "latent" permits for that year.

Several complications make it difficult to accurately count the number of latent permits; therefore, the figures should be viewed with caution. In some cases, permits might be active in the fishery but might not be used to record landings. This can occur when permit holders fish in a group, especially among family or friends, and the group records their landings on only one, or some, of the group's permits. Although this practice is not strictly legal,⁸ it is common across the state in set gillnet fisheries. The effect would be to under-count the number of permits active in the fishery, and over-estimate the latency rate.

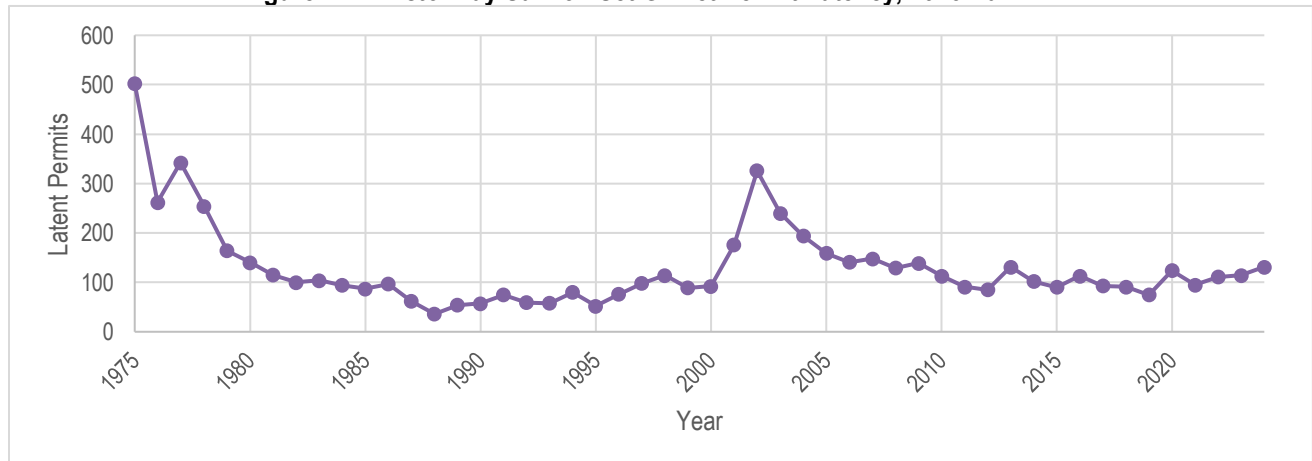
There are many reasons why an individual might not fish in any given year. This table does not explain any of these reasons but simply estimates the rate of permit latency.

Table 2-6. Bristol Bay Salmon Set Gillnet Permit Latency, 1975-2024

Permits				Permits				Permits			
Year	Issued	Fished	Latency Rate	Year	Issued	Fished	Latency Rate	Year	Issued	Fished	Latency Rate
1975	928	426	54.1%	1992	1027	968	5.7%	2009	982	843	14.2%
1976	764	502	34.3%	1993	1023	965	5.7%	2010	982	869	11.5%
1977	840	498	40.7%	1994	1019	939	7.9%	2011	981	890	9.3%
1978	910	656	27.9%	1995	1019	967	5.1%	2012	979	894	8.7%
1979	934	770	17.6%	1996	1017	941	7.5%	2013	978	847	13.4%
1980	947	807	14.8%	1997	1019	921	9.6%	2014	977	875	10.4%
1981	956	841	12.0%	1998	1015	901	11.2%	2015	975	885	9.2%
1982	959	859	10.4%	1999	1014	925	8.8%	2016	971	858	11.6%
1983	969	865	10.7%	2000	1013	921	9.1%	2017	972	879	9.6%
1984	963	869	9.8%	2001	1010	834	17.4%	2018	970	879	9.4%
1985	959	872	9.1%	2002	1006	680	32.4%	2019	965	890	7.8%
1986	966	869	10.0%	2003	1000	760	24.0%	2020	964	840	12.9%
1987	961	899	6.5%	2004	989	795	19.6%	2021	964	869	9.9%
1988	958	922	3.8%	2005	988	829	16.1%	2022	961	850	11.6%
1989	1025	971	5.3%	2006	985	844	14.3%	2023	957	843	11.9%
1990	1028	971	5.5%	2007	983	835	15.1%	2024	952	821	13.8%
1991	1025	950	7.3%	2008	979	850	13.2%				

- When an individual with an interim-entry permit is issued a permanent permit in the same year, only the permanent permit is counted.
- 'Permits Fished' is the number of CFEC permits that were used to record commercial landings in that year.

Figure 2-2. Bristol Bay Salmon Set Gillnet Permit Latency, 1975-2024



⁸ See AS 16.05.680 (b) and AS 16.05.690 (b).

New Entrants into the Bristol Bay Salmon Set Gillnet Fishery

New entrants are defined herein as individuals who, for the first time, record a landing on a permanent S04T permit. It is important to note that initial permit holders are not considered new entrants because they needed a proven fishing history prior to 1975 in order to become an initial permit holder of a limited entry permit. Individuals who only make landings on an emergency transfer or interim-entry permit for any given year are not considered in this table.

Table 2-7 and Figure 2-3 describe individuals rather than permits. An individual may hold up to two permits in this fishery but can only fish one of them. An individual may hold one S04T permit one year, and then in subsequent years hold a different S04T permit. Likewise, individuals may enter and exit the fishery multiple times over the years. Individuals are only counted once as a new entrant and only in the year in which they made their first documented landing.

Table 2-7. New Entrants into the Bristol Bay Salmon Set Gillnet Fishery, 1975-2024

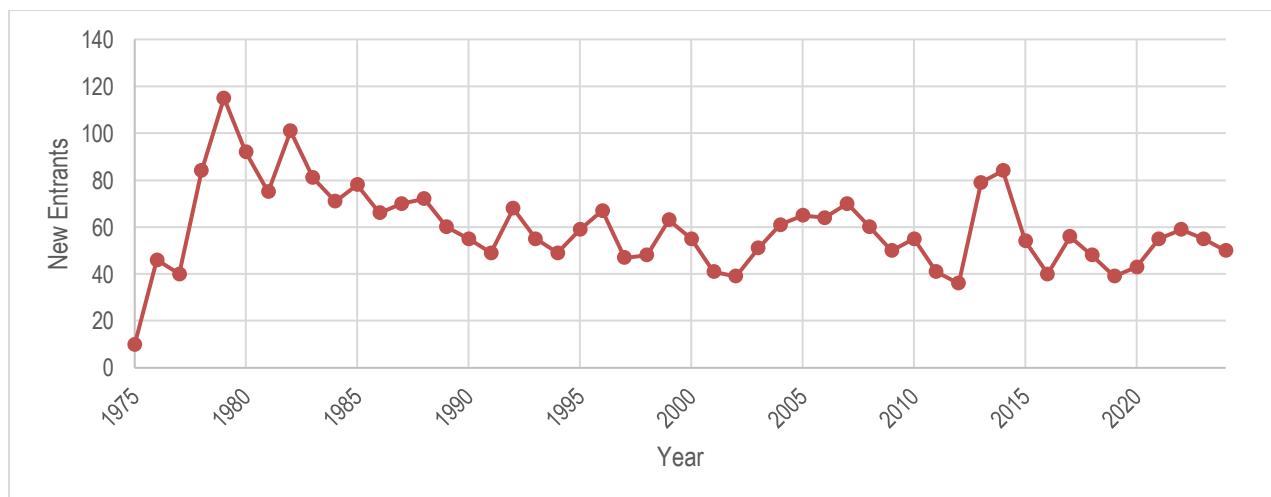
Year	Individuals With Landings	New Entrants with Landings	% New Entrants
1975	429	10	2.3%
1976	512	46	9.0%
1977	496	40	8.1%
1978	660	84	12.7%
1979	778	115	14.8%
1980	814	92	11.3%
1981	856	75	8.8%
1982	873	101	11.6%
1983	884	81	9.2%
1984	879	71	8.1%
1985	888	78	8.8%
1986	888	66	7.4%
1987	920	70	7.6%
1988	939	72	7.7%
1989	995	60	6.0%
1990	991	55	5.5%
1991	967	49	5.1%
1992	1005	68	6.8%

Year	Individuals With Landings	New Entrants with Landings	% New Entrants
1993	992	55	5.5%
1994	958	49	5.1%
1995	995	59	5.9%
1996	964	67	7.0%
1997	946	47	5.0%
1998	916	48	5.2%
1999	931	63	6.8%
2000	934	55	5.9%
2001	842	41	4.9%
2002	683	39	5.7%
2003	770	51	6.6%
2004	801	61	7.6%
2005	834	65	7.8%
2006	855	64	7.5%
2007	847	70	8.3%
2008	854	60	7.0%
2009	858	50	5.8%
2010	816	55	6.7%

Year	Individuals With Landings	New Entrants with Landings	% New Entrants
2011	796	41	5.2%
2012	787	36	4.6%
2013	856	79	9.2%
2014	884	84	9.5%
2015	893	54	6.0%
2016	872	40	4.6%
2017	892	56	6.3%
2018	888	48	5.4%
2019	906	39	4.3%
2020	850	43	5.1%
2021	874	55	6.3%
2022	862	59	6.8%
2023	847	55	6.5%
2024	827	50	6.0%

- This table excludes individuals with interim-entry and emergency transfer permits.

Figure 2-3. New Entrants into the Bristol Bay Salmon Set Gillnet Fishery, 1975-2024



Age of S04T Permit Holders

Table 2-8. Median Age of Select CFEC Permit Holders and the General Alaskan Population

Year	S04T	Combined Bristol Bay Salmon	Statewide Salmon Set Gillnet	Statewide All Permits	Median AK Age
1980	30.9	39.3	35.8	39.4	26
1981	31.3	39.2	36.0	39.4	26.4
1982	32.2	38.9	36.0	39.3	26.8
1983	32.8	38.9	35.7	39.4	27.1
1984	33.8	39.2	35.8	39.7	27.3
1985	34.6	39.4	36.3	40.0	27.5
1986	35.2	39.8	36.7	40.0	27.8
1987	35.8	39.7	37.0	40.3	28.2
1988	35.9	39.7	37.3	40.5	28.6
1989	37.2	40.1	38.0	40.9	29
1990	37.8	40.6	38.3	41.3	29.3
1991	38.4	41.0	38.9	41.8	29.7
1992	38.7	41.5	39.3	42.3	30.1
1993	39.5	41.9	39.9	42.8	30.5
1994	40.2	42.4	40.4	43.3	30.8
1995	40.8	43.0	41.0	43.7	31.1
1996	40.9	43.5	41.7	44.3	31.5
1997	41.3	44.1	42.0	44.9	31.8
1998	42.2	44.4	42.6	45.3	32.1
1999	42.4	45.1	43.1	45.9	32.3
2000	42.6	45.5	43.4	46.3	32.4
2001	43.3	46.1	44.1	46.8	32.7
2002	44.3	47.0	44.8	47.5	33
2003	44.4	47.3	45.5	48.1	33.2
2004	45.0	47.8	45.8	48.6	33.4
2005	44.8	47.7	46.0	49.0	33.6
2006	44.8	48.0	46.3	49.4	33.8
2007	45.2	47.8	46.8	49.8	33.9
2008	45.4	48.2	46.8	50.2	33.9
2009	45.7	48.6	47.2	50.6	33.9
2010	46.3	49.0	47.6	51.0	33.8
2011	46.4	49.4	48.1	51.3	33.9
2012	47.2	49.7	48.7	51.7	33.9
2013	46.2	49.5	48.8	51.8	34
2014	46.1	49.4	49.0	52.2	34.2
2015	46.2	49.6	49.4	52.6	34.4
2016	47.0	49.9	49.7	53.1	34.6
2017	47.0	50.0	50.0	53.6	34.8
2018	46.8	49.1	50.2	53.9	35.1
2019	46.4	48.6	50.4	54.0	35.4
2020	45.4	48.5	50.8	54.3	35.6
2021	45.0	46.9	50.9	54.6	36
2022	44.5	45.8	51.0	54.7	36.4
2023	44.6	45.4	51.5	55.0	36.5
2024	44.4	45.3	52.0	55.3	36.9

- Age data from the CFEC permit file is as of December 31st of each year.

Table 2-8 shows the annual median age of five different cohorts of people: 1) Bristol Bay salmon set gillnet (S04T) permit holders; 2) combined Bristol Bay salmon permit holders; 3) all salmon set gillnet permit holders statewide; 4) all CFEC limited entry permit holders; and 5) the Alaskan population.

Note that these figures include ages of permit holders for both transferable and non-transferable permits. Some individuals hold permits in more than one fishery; in these cases, the age of the permit holder is counted once for each permit that he or she holds.

The median age of the general Alaskan population has increased 10.9 years between 1980 and 2024. The change in ages over the same period for all CFEC permit holders was an increase of 15.9 years. The median age of statewide set gillnet permit holders increased by 16.2 years, while the median age for all Bristol Bay permit holders increased by 6 years.

For S04T permit holders, the median age increased by 13.5 years.

S04T Permit Stacking

From 2010 through 2012, an Alaska Board of Fisheries regulation allowed for stacked permit operations. A stacked permit operation is where an individual who holds two permits is allowed to fish two full complements of gear. CFEC completed an in-depth analysis of S04T permit stacking in 2012.⁹

Stacked permit operations are identified in this section when a permit holder makes at least one landing while holding two permits.

Tables 2-9 and 2-10 include the source and acquisition method for the second permit held by individuals at year-end. A large portion of permits was sourced from family members which is typical for set gillnet permits. The majority of permits were acquired as gifts.

Table 2-9. Transfer Acquisition Method for the Second S04T Permit

Year	Gift	Sale	Trade	Other	Unknown
2010	33	21	0	1	0
2011	57	36	0	2	0
2012	58	45	0	2	0

Table 2-10. Source of the Second S04T Permit

Year	Friend/ Partner	Immediate Family	Other Relative	Other	Unknown
2010	9	27	4	15	0
2011	16	44	5	30	0
2012	21	46	4	34	0

Table 2-11 compares the level of participation, effort, and real (2025 CPI) earnings for both single and stacked permit operations. Effort is defined as the number of complements of gear allowed; stacked permit operations were allowed to deploy two units of gear, and single permit operations can only deploy one unit of gear.

Table 2-11. Bristol Bay Salmon Set Gillnet Participation, Effort, and Real Earnings by Operation and Resident Type, 2010-2012

Year	Residency	Operation Type	Individuals with Landings	Real Gross Earnings	Average Real Gross Earnings
2010	Local	Single	285	\$13,938,701.29	\$48,907.72
		Stacked	20	\$1,837,296.23	\$91,864.81
		Combined	297	\$15,775,997.52	\$53,117.84
	Non Alaska Resident	Single	253	\$13,591,665.85	\$53,722.00
		Stacked	22	\$2,671,445.04	\$121,429.32
		Combined	272	\$16,263,110.89	\$59,790.85
	Nonlocal	Single	216	\$9,821,901.03	\$45,471.76
		Stacked	27	\$3,530,497.06	\$130,759.15
		Combined	243	\$13,352,398.09	\$54,948.14
	Total	Single	754	37352268.17	\$49,538.82
		Stacked	69	8039238.33	\$116,510.70
		Combined	816	45391506.5	\$55,626.85

-continued-

⁹ See *Bristol Bay Set Gillnet Permit Stacking*, CFEC Report No. 12-2N.

Bristol Bay Salmon Set Gillnet (S04T)

Year	Residency	Operation Type	Individuals with Landings	Real Gross Earnings	Average Real Gross Earnings
2011	Local	Single	289	\$12,936,800.36	\$44,764.02
		Stacked	16	\$1,454,826.59	\$90,926.66
		Combined	302	\$14,391,626.95	\$47,654.39
	Non Alaska Resident	Single	214	\$9,361,030.41	\$43,743.13
		Stacked	42	\$3,645,721.96	\$86,802.90
		Combined	256	\$13,006,752.37	\$50,807.63
	Nonlocal	Single	193	\$7,538,383.03	\$39,058.98
		Stacked	42	\$3,890,060.32	\$92,620.48
		Combined	235	\$11,428,443.35	\$48,631.67
	Total	Single	696	29836213.8	\$42,868.12
		Stacked	100	\$8,990,608.87	\$89,906.09
		Combined	796	38826822.67	\$48,777.42
2012	Local	Single	285	\$9,909,304.87	\$34,769.49
		Stacked	20	\$1,457,604.48	\$72,880.22
		Combined	295	\$11,366,909.35	\$38,531.90
	Non Alaska Resident	Single	197	\$8,105,263.16	\$41,143.47
		Stacked	56	\$4,539,546.74	\$81,063.33
		Combined	253	\$12,644,809.90	\$49,979.49
	Nonlocal	Single	193	\$7,032,931.19	\$36,440.06
		Stacked	40	\$3,326,147.62	\$83,153.69
		Combined	233	\$10,359,078.81	\$44,459.57
	Total	Single	675	25047499.22	\$37,107.41
		Stacked	116	9323298.84	\$80,373.27
		Combined	787	\$34,370,798.06	\$43,673.19

- Real ex-vessel values were calculated using the 2025 Consumer Price Index from the U.S. Bureau of Labor Statistics.

*Bristol Bay Salmon Set Gillnet (S04T)***S04T Permit Value**

Many permit transfers are non-monetary transactions (see Table 2-2). Table 2-12 considers solely arms-length market transactions where permits are sold. CFEC estimated values are expressed in both nominal and real (adjusted for inflation) terms.

Table 2-12. CFEC Estimated Value of Bristol Bay Salmon Set Gillnet Permits

Year	S04T Permit Sales	Nominal		Real	
		Permit Value	Standard Deviation	Permit Value	Standard Deviation
1987	59	\$35,200	\$4,487	\$96,100	\$12,600
1988	41	\$46,800	\$9,415	\$122,800	\$25,400
1989	26	\$60,800	\$9,400	\$152,300	\$24,200
1990	21	\$65,600	\$11,261	\$155,800	\$27,500
1991	31	\$60,600	\$7,809	\$138,100	\$18,300
1992	45	\$49,300	\$5,584	\$109,200	\$12,700
1993	27	\$48,300	\$5,479	\$103,800	\$12,100
1994	26	\$37,500	\$5,156	\$78,500	\$11,100
1995	29	\$41,900	\$4,537	\$85,400	\$9,500
1996	45	\$40,500	\$3,785	\$80,200	\$7,700
1997	28	\$37,100	\$3,220	\$71,800	\$6,400
1998	27	\$30,200	\$3,627	\$57,500	\$7,100
1999	27	\$31,100	\$5,116	\$57,900	\$9,800
2000	30	\$32,400	\$3,292	\$58,500	\$6,100
2001	21	\$26,200	\$4,716	\$46,000	\$8,500
2002	22	\$11,700	\$2,424	\$20,100	\$4,300
2003	23	\$12,100	\$1,845	\$20,400	\$3,200
2004	25	\$14,100	\$2,723	\$23,100	\$4,600
2005	38	\$15,100	\$2,264	\$24,000	\$3,700
2006	31	\$23,100	\$3,664	\$35,500	\$5,800
2007	27	\$24,000	\$3,054	\$35,900	\$4,700
2008	25	\$27,200	\$2,361	\$39,200	\$3,500
2009	43	\$28,200	\$2,152	\$40,800	\$3,200
2010	45	\$28,500	\$2,529	\$40,500	\$3,700
2011	35	\$36,500	\$4,159	\$50,300	\$5,900
2012	28	\$40,300	\$2,374	\$54,500	\$3,300
2013	23	\$39,900	\$2,336	\$53,200	\$3,200
2014	20	\$38,600	\$1,855	\$50,600	\$2,500
2015	13	\$38,500	\$4,605	\$50,400	\$6,200
2016	16	\$33,700	\$3,761	\$43,500	\$5,000
2017	13	\$38,700	\$2,228	\$48,900	\$2,900
2018	20	\$43,300	\$2,282	\$53,500	\$2,900
2019	21	\$54,600	\$6,650	\$66,300	\$8,300
2020	13	\$58,400	\$5,597	\$70,000	\$6,900
2021	19	\$61,700	\$6,199	\$70,700	\$7,300
2022	25	\$69,500	\$7,337	\$73,800	\$8,000
2023	21	\$71,400	\$8,881	\$72,700	\$9,300
2024	19	\$56,000	\$5,604	\$56,000	\$5,700

- Permit values represent averages of all arms-length sale transactions over the year. Additional data from recent months in the preceding year of a permit transaction may be included until at least four observations can be averaged.
- Real permit values were calculated using the 2025 Consumer Price Index from the U.S. Bureau of Labor Statistics.

Participation and Earnings

Earnings are estimated from weighted average ex-vessel prices and, as noted earlier, come primarily from the ADF&G Commercial Operators Annual Report and fish ticket values. Earnings shown in Figure 2-4 reflect both nominal and real dollars using the 2025 Consumer Price Index from the U.S. Bureau of Labor Statistics.

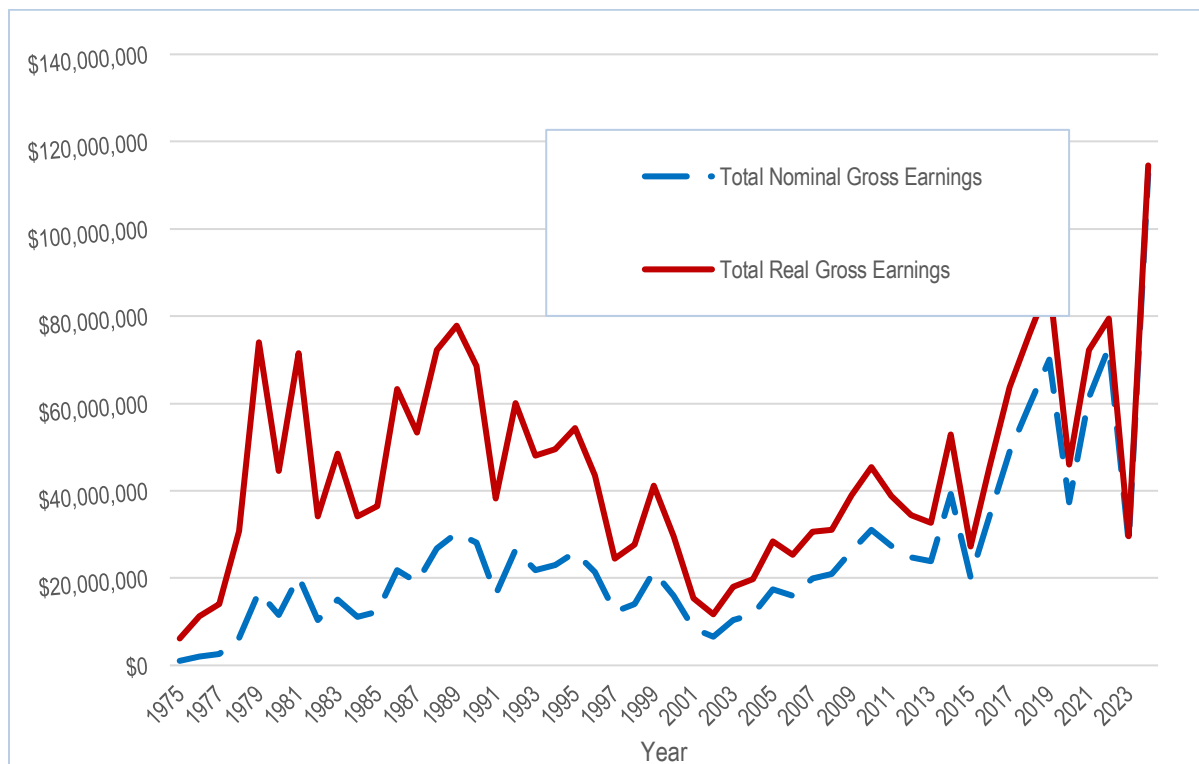
Permit counts include interim-entry permits and permanent permits. Interim-entry permits are issued to individuals during the period when their applications for permanent permits are in adjudication. The last year an interim-entry permit was held in the Bristol Bay salmon set gillnet fishery was in 2004. Some individuals made landings on both an interim-entry permit and subsequently on their newly issued permanent permit in the same year; for these instances, only the permanent permit is counted in this report.

Table 2-13 reports the number of permits issued, permits with landings, and estimated gross earnings in the Bristol Bay salmon set gillnet fishery from 1975 to 2024. Note that the figures by permit in this table span the entire year, regardless of who held the permit or how many times the permit was transferred.

Table 2-14 reports the number of permit holders (people) and estimated real (inflation adjusted) gross earnings by each resident type.

Table 2-15 breaks out participation and real earnings by ADF&G salmon management area. Note that some permits are used to record landings in more than one district.

Figure 2-4. Estimated Nominal and Real Total Gross Earnings Bristol Bay Salmon Set Gillnet Permits



- Real earnings are adjusted for inflation using the 2025 U.S. Bureau of Labor Statistics Consumer Price Index.

*Bristol Bay Salmon Set Gillnet (S04T)***Table 2-13. Estimated Total Gross Earnings (Real and Nominal) for the Bristol Bay Salmon Set Gillnet Fishery, With Average Gross (Real) Earnings by Permit, 1975-2024**

Year	Permits Issued	Total Nominal Gross Earnings	Total Real Gross Earnings	Permits with Landings	Average Real Gross Earnings per Permit
1975	786	\$1,039,384	\$6,161,676	426	\$14,464
1976	761	\$2,016,773	\$11,303,204	502	\$22,516
1977	835	\$2,670,321	\$14,056,570	498	\$28,226
1978	905	\$6,279,377	\$30,711,179	656	\$46,816
1979	934	\$16,834,409	\$74,005,746	770	\$96,111
1980	947	\$11,513,369	\$44,593,582	807	\$55,258
1981	955	\$20,399,307	\$71,581,168	841	\$85,114
1982	957	\$10,309,026	\$34,075,453	859	\$39,669
1983	961	\$15,140,674	\$48,513,748	865	\$56,085
1984	962	\$11,131,822	\$34,175,808	869	\$39,328
1985	959	\$12,323,913	\$36,546,565	872	\$41,911
1986	962	\$21,769,265	\$63,324,616	869	\$72,871
1987	960	\$18,980,677	\$53,305,332	899	\$59,294
1988	958	\$26,800,446	\$72,302,244	922	\$78,419
1989	1025	\$30,255,514	\$77,892,820	971	\$80,219
1990	1027	\$28,092,907	\$68,605,689	971	\$70,655
1991	1024	\$16,309,468	\$38,217,976	950	\$40,229
1992	1025	\$26,438,867	\$60,127,271	968	\$62,115
1993	1023	\$21,748,260	\$48,033,207	965	\$49,775
1994	1019	\$22,989,161	\$49,488,767	939	\$52,704
1995	1019	\$25,943,184	\$54,325,028	967	\$56,179
1996	1017	\$21,373,407	\$43,477,784	941	\$46,204
1997	1019	\$12,312,359	\$24,474,506	921	\$26,574
1998	1015	\$14,112,720	\$27,625,650	901	\$30,661
1999	1014	\$21,521,112	\$41,223,689	925	\$44,566
2000	1012	\$15,980,140	\$29,612,798	921	\$32,153
2001	1010	\$8,491,102	\$15,303,514	834	\$18,350
2002	1002	\$6,596,599	\$11,702,367	680	\$17,209
2003	995	\$10,416,508	\$18,064,309	760	\$23,769
2004	985	\$11,663,522	\$19,700,855	795	\$24,781
2005	984	\$17,398,701	\$28,431,217	829	\$34,296
2006	983	\$15,971,228	\$25,284,052	844	\$29,957
2007	981	\$19,899,763	\$30,623,746	835	\$36,675
2008	976	\$20,955,694	\$31,064,721	850	\$36,547
2009	979	\$26,211,898	\$38,979,714	843	\$46,239
2010	927	\$31,022,079	\$45,391,507	861	\$52,720
2011	886	\$27,369,817	\$38,826,823	878	\$44,222
2012	874	\$24,730,751	\$34,370,798	883	\$38,925
2013	970	\$23,895,161	\$32,731,591	847	\$38,644
2014	973	\$39,293,065	\$52,967,052	875	\$60,534
2015	972	\$20,218,565	\$27,220,254	885	\$30,757
2016	965	\$34,356,275	\$45,676,668	858	\$53,236
2017	966	\$48,995,471	\$63,777,405	879	\$72,557
2018	967	\$59,696,076	\$75,861,773	879	\$86,305
2019	962	\$70,085,073	\$87,473,180	890	\$98,284
2020	964	\$37,342,149	\$46,031,667	840	\$54,800
2021	963	\$61,369,795	\$72,269,070	869	\$83,163
2022	961	\$72,809,440	\$79,391,414	850	\$93,402
2023	955	\$28,193,986	\$29,524,742	843	\$35,023
2024	949	\$112,607,879	\$114,544,734	821	\$139,519

- Adjusted for inflation to 2025 dollars using U.S. Bureau of Labor Statistics Consumer Price Index.
- Counts will differ from CFEC online Basic Information Tables where the online data does not account for the combination of interim-entry permits that were issued as permanent permits in the same year.

*Bristol Bay Salmon Set Gillnet (S04T)***Table 2-14. Estimated Real Gross Earnings for Permit Holders in the Bristol Bay Salmon Set Gillnet Fishery by Resident Type, 1975-2024**

Year	Local People	Local Total Earnings	Local Average Earnings	Nonlocal People	Nonlocal Total Earnings	Nonlocal Average Earnings	Nonresident People	Nonresident Total Earnings	Nonresident Average Earnings	Total People	Total Total Earnings	Total Average Earnings
1975	288	\$3,903,004	\$13,552	78	\$1,082,691	\$13,881	63	\$1,175,981	\$18,666	429	\$6,161,676	\$14,363
1976	328	\$7,122,594	\$21,715	87	\$1,916,096	\$22,024	97	\$2,264,514	\$23,346	512	\$11,303,204	\$22,077
1977	318	\$8,200,202	\$25,787	80	\$2,440,098	\$30,501	98	\$3,416,269	\$34,860	496	\$14,056,570	\$28,340
1978	408	\$17,426,195	\$42,711	130	\$7,496,865	\$57,668	122	\$5,788,119	\$47,444	660	\$30,711,179	\$46,532
1979	455	\$37,091,256	\$81,519	174	\$20,572,046	\$118,230	149	\$16,342,444	\$109,681	778	\$74,005,746	\$95,123
1980	445	\$19,791,191	\$44,475	194	\$14,005,510	\$72,193	175	\$10,796,881	\$61,696	814	\$44,593,582	\$54,783
1981	463	\$33,468,673	\$72,287	204	\$19,673,043	\$96,436	189	\$18,439,452	\$97,563	856	\$71,581,168	\$83,623
1982	443	\$14,972,007	\$33,797	228	\$10,027,722	\$43,981	202	\$9,075,723	\$44,929	873	\$34,075,453	\$39,033
1983	438	\$20,000,462	\$45,663	230	\$14,582,340	\$63,401	216	\$13,930,946	\$64,495	884	\$48,513,748	\$54,880
1984	430	\$14,796,916	\$34,411	236	\$10,267,429	\$43,506	213	\$9,111,463	\$42,777	879	\$34,175,808	\$38,880
1985	430	\$15,428,319	\$35,880	248	\$11,138,587	\$44,914	210	\$9,979,659	\$47,522	888	\$36,546,565	\$41,156
1986	427	\$27,983,993	\$65,536	249	\$18,967,500	\$76,175	212	\$16,373,122	\$77,232	888	\$63,324,616	\$71,312
1987	442	\$22,452,398	\$50,797	266	\$17,250,703	\$64,852	212	\$13,602,231	\$64,161	920	\$53,305,332	\$57,941
1988	453	\$32,225,504	\$71,138	263	\$20,505,987	\$77,970	223	\$19,570,752	\$87,761	939	\$72,302,244	\$76,999
1989	481	\$30,382,944	\$63,166	283	\$24,485,738	\$86,522	231	\$23,024,139	\$99,672	995	\$77,892,820	\$78,284
1990	454	\$27,412,607	\$60,380	299	\$21,519,246	\$71,971	238	\$19,673,836	\$82,663	991	\$68,605,689	\$69,229
1991	433	\$16,948,328	\$39,142	293	\$11,105,645	\$37,903	241	\$10,164,003	\$42,174	967	\$38,217,976	\$39,522
1992	458	\$23,261,393	\$50,789	303	\$18,963,763	\$62,587	244	\$17,902,115	\$73,369	1005	\$60,127,271	\$59,828
1993	453	\$18,030,378	\$39,802	295	\$15,616,392	\$52,937	244	\$14,386,437	\$58,961	992	\$48,033,207	\$48,421
1994	438	\$19,056,791	\$43,509	280	\$16,450,244	\$58,751	240	\$13,981,733	\$58,257	958	\$49,488,767	\$51,658
1995	450	\$22,054,699	\$49,010	303	\$17,256,039	\$56,951	242	\$15,014,290	\$62,043	995	\$54,325,028	\$54,598
1996	422	\$17,760,473	\$42,086	305	\$14,163,995	\$46,439	237	\$11,553,316	\$48,748	964	\$43,477,784	\$45,101
1997	406	\$7,541,562	\$18,575	295	\$8,795,679	\$29,816	245	\$8,137,265	\$33,213	946	\$24,474,506	\$25,872
1998	395	\$10,153,053	\$25,704	278	\$8,901,828	\$32,021	243	\$8,570,769	\$35,271	916	\$27,625,650	\$30,159
1999	386	\$14,525,519	\$37,631	304	\$14,445,026	\$47,517	241	\$12,253,145	\$50,843	931	\$41,223,689	\$44,279
2000	376	\$11,417,128	\$30,365	303	\$9,679,774	\$31,946	255	\$8,515,895	\$33,396	934	\$29,612,798	\$31,705
2001	336	\$6,488,059	\$19,310	265	\$4,998,540	\$18,862	241	\$3,816,914	\$15,838	842	\$15,303,514	\$18,175
2002	287	\$3,907,438	\$13,615	192	\$3,773,368	\$19,653	204	\$4,021,560	\$19,714	683	\$11,702,367	\$17,134
2003	301	\$7,364,389	\$24,466	238	\$5,501,173	\$23,114	231	\$5,198,746	\$22,505	770	\$18,064,309	\$23,460
2004	294	\$5,391,674	\$18,339	254	\$6,825,662	\$26,873	254	\$7,483,519	\$29,463	801	\$19,700,855	\$24,595
2005	309	\$9,328,694	\$30,190	267	\$9,516,926	\$35,644	258	\$9,585,597	\$37,153	834	\$28,431,217	\$34,090
2006	315	\$8,799,372	\$27,935	275	\$8,339,665	\$30,326	265	\$8,145,015	\$30,736	855	\$25,284,052	\$29,572
2007	309	\$10,802,621	\$34,960	265	\$9,331,252	\$35,212	273	\$10,489,873	\$38,424	847	\$30,623,746	\$36,156
2008	307	\$11,149,006	\$36,316	271	\$9,395,012	\$34,668	276	\$10,520,703	\$38,118	854	\$31,064,721	\$36,376
2009	302	\$12,259,956	\$40,596	278	\$12,380,851	\$44,535	278	\$14,338,906	\$51,579	858	\$38,979,714	\$45,431

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Bristol Bay Salmon Set Gillnet (S04T)

Year	Local			Nonlocal			Nonresident			Total		
	People	Total Earnings	Average Earnings	People	Total Earnings	Average Earnings	People	Total Earnings	Average Earnings	People	Total Earnings	Average Earnings
2009	302	\$12,259,956	\$40,596	278	\$12,380,851	\$44,535	278	\$14,338,906	\$51,579	858	\$38,979,714	\$45,431
2010	297	\$15,611,974	\$52,566	257	\$13,580,019	\$52,841	272	\$16,199,513	\$59,557	816	\$45,391,507	\$55,627
2011	302	\$14,333,024	\$47,460	237	\$11,523,317	\$48,622	259	\$12,970,482	\$50,079	796	\$38,826,823	\$48,777
2012	295	\$11,107,145	\$37,651	235	\$10,408,116	\$44,290	260	\$12,855,537	\$49,444	787	\$34,370,798	\$43,673
2013	311	\$11,230,934	\$36,112	255	\$9,792,471	\$38,402	290	\$11,708,186	\$40,373	856	\$32,731,591	\$38,238
2014	316	\$18,163,254	\$57,479	262	\$14,784,074	\$56,428	306	\$20,019,724	\$65,424	884	\$52,967,052	\$59,917
2015	320	\$9,357,247	\$29,241	259	\$7,589,014	\$29,301	314	\$10,273,994	\$32,720	893	\$27,220,254	\$30,482
2016	323	\$16,470,967	\$50,994	245	\$12,174,932	\$49,694	304	\$17,030,769	\$56,022	872	\$45,676,668	\$52,381
2017	314	\$19,539,578	\$62,228	263	\$19,145,366	\$72,796	315	\$25,092,461	\$79,659	892	\$63,777,405	\$71,499
2018	327	\$27,568,433	\$84,307	254	\$20,783,483	\$81,825	307	\$27,509,857	\$89,609	888	\$75,861,773	\$85,430
2019	329	\$26,532,655	\$80,646	272	\$26,346,065	\$96,861	305	\$34,594,459	\$113,424	906	\$87,473,180	\$96,549
2020	292	\$11,932,988	\$40,866	260	\$14,829,598	\$57,037	298	\$19,269,081	\$64,661	850	\$46,031,667	\$54,155
2021	287	\$20,279,938	\$70,662	263	\$22,907,265	\$87,100	324	\$29,081,867	\$89,759	874	\$72,269,070	\$82,688
2022	288	\$19,148,466	\$66,488	249	\$25,789,249	\$103,571	325	\$34,453,699	\$106,011	862	\$79,391,414	\$92,101
2023	262	\$6,770,383	\$25,841	265	\$9,520,582	\$35,927	320	\$13,233,776	\$41,356	847	\$29,524,742	\$34,858
2024	251	\$27,344,706	\$108,943	253	\$30,067,831	\$118,845	323	\$57,132,197	\$176,880	827	\$114,544,734	\$138,506

- Adjusted for inflation to 2025 dollars using U.S. Bureau of Labor Statistics Consumer Price Index.
- Counts will differ from CFEC online Basic Information Tables where the online data does not account for the combination of interim-entry permits that were issued as permanent permits in the same year.
- Note that these counts are for individuals, not permits.

Bristol Bay Salmon Set Gillnet (S04T)

Table 2-15. Gross Real Earnings for the Bristol Bay Salmon Set Gillnet Fishery by ADF&G Salmon District, 1975 to 2024

Year	Permits	Togiak Real Gross Earnings	Permits	Nushagak Real Gross Earnings	Permits	Naknek-Kvichak Real Gross Earnings	Permits	Egegik Real Gross Earnings	Permits	Ugashik Real Gross Earnings	Permits	Other Real Gross Earnings	Permits	Total Real Gross Earnings
1975	35	\$358,674	143	\$1,942,461	159	\$2,492,998	92	\$1,328,415	14	\$38,646		Confidential	444	\$6,161,676
1976	36	\$777,487	178	\$4,167,518	197	\$3,687,080	97	\$2,272,072	20	\$354,747	6	\$44,300	534	\$11,303,204
1977	38	\$1,177,393	176	\$2,671,080	188	\$5,278,776	92	\$4,572,657	9	\$297,522	8	\$59,142	511	\$14,056,570
1978	51	\$2,682,020	229	\$12,742,481	273	\$10,417,344	131	\$4,711,197	6	\$21,768	8	\$136,369	698	\$30,711,179
1979	63	\$2,273,457	250	\$13,931,376	302	\$37,910,866	159	\$13,837,148	28	\$1,657,449	337	\$4,395,451	1139	\$74,005,746
1980	63	\$2,362,455	250	\$10,497,407	348	\$20,200,385	183	\$9,666,526	31	\$1,455,009	44	\$411,801	919	\$44,593,582
1981	73	\$2,982,604	262	\$25,461,684	351	\$21,648,515	170	\$16,977,216	53	\$4,333,535	21	\$177,613	930	\$71,581,168
1982	72	\$2,124,220	263	\$11,193,929	349	\$9,804,032	173	\$7,241,854	57	\$3,166,808	18	\$544,611	932	\$34,075,453
1983	69	\$2,007,860	265	\$11,061,343	362	\$20,706,552	175	\$11,757,534	49	\$2,928,485	7	\$51,974	927	\$48,513,748
1984	76	\$1,947,452	264	\$7,167,812	346	\$15,810,511	188	\$6,000,286	63	\$3,018,224	16	\$231,522	953	\$34,175,808
1985	66	\$1,362,242	250	\$8,092,998	354	\$14,561,699	181	\$8,046,871	81	\$4,211,124	18	\$271,631	950	\$36,546,565
1986	103	\$3,255,808	282	\$18,348,525	302	\$23,202,962	190	\$12,295,587	82	\$6,172,201	7	\$49,534	966	\$63,324,616
1987	66	\$3,668,529	282	\$16,962,292	317	\$17,022,562	206	\$12,281,016	78	\$3,178,643	9	\$192,290	958	\$53,305,332
1988	121	\$11,512,738	282	\$15,904,151	353	\$17,718,372	193	\$20,788,486	70	\$5,912,952	14	\$465,545	1033	\$72,302,244
1989	96	\$1,279,822	288	\$23,656,131	364	\$27,878,087	217	\$17,575,519	68	\$7,380,340	18	\$122,920	1051	\$77,892,820
1990	76	\$1,445,788	342	\$18,048,669	439	\$31,941,675	215	\$13,764,621	64	\$3,161,039	16	\$243,897	1152	\$68,605,689
1991	103	\$2,926,238	311	\$12,924,302	357	\$12,287,408	212	\$6,432,453	63	\$3,539,721	12	\$107,853	1058	\$38,217,976
1992	116	\$4,946,453	297	\$14,813,773	349	\$15,668,827	205	\$19,371,278	67	\$5,042,296	18	\$284,644	1052	\$60,127,271
1993	108	\$2,800,172	293	\$13,898,965	333	\$13,241,781	226	\$14,173,687	71	\$3,731,014	11	\$187,588	1042	\$48,033,207
1994	115	\$3,298,557	295	\$12,048,104	322	\$20,226,339	224	\$9,927,773	68	\$3,727,623	9	\$260,372	1033	\$49,488,767
1995	103	\$3,531,803	292	\$14,284,900	347	\$21,259,496	207	\$13,082,294	67	\$2,103,461	12	\$63,073	1028	\$54,325,028
1996	111	\$3,229,487	277	\$11,470,361	348	\$15,215,356	203	\$11,147,523	53	\$2,364,796	6	\$50,260	998	\$43,477,784
1997	84	\$1,160,156	283	\$8,462,961	299	\$1,786,472	242	\$10,955,263	58	\$2,038,193	9	\$71,463	975	\$24,474,506
1998	82	\$1,896,194	276	\$11,188,344	298	\$5,802,073	209	\$6,949,428	52	\$1,751,672	7	\$37,940	924	\$27,625,650
1999	77	\$1,908,211	295	\$15,302,666	309	\$12,086,745	204	\$9,781,290		Confidential		Confidential	937	\$41,223,689
2000	86	\$2,931,753	298	\$10,251,007	322	\$6,510,369	203	\$8,394,093		Confidential		Confidential	966	\$29,612,798
2001	82	\$1,547,767	277	\$5,150,510	250	\$5,931,646	193	\$2,188,239	51	\$485,316			854	\$15,303,514
2002	59	\$568,605	215	\$3,786,469	230	\$2,645,600	147	\$3,672,624	35	\$1,029,069		\$0	686	\$11,702,367
2003	76	\$1,687,629	222	\$6,352,496	244	\$6,246,098	181	\$2,609,668	52	\$1,168,418		\$0	775	\$18,064,309
2004	72	\$1,226,503	231	\$5,467,567	277	\$4,317,766	178	\$6,741,725	44	\$1,947,294		\$0	802	\$19,700,855
2005	71	\$1,512,767	236	\$6,831,411	288	\$9,478,716	184	\$8,498,798		Confidential		Confidential	837	\$28,431,217
2006	76	\$2,197,252	231	\$8,034,818	303	\$6,502,842	185	\$6,779,695	56	\$1,769,445		\$0	851	\$25,284,052
2007	75	\$2,390,553	235	\$10,229,770	289	\$9,974,802	189	\$5,829,893	50	\$2,198,728		\$0	838	\$30,623,746
2008	73	\$2,012,164	252	\$9,270,968	283	\$12,084,974	189	\$6,542,485	53	\$1,154,129		\$0	850	\$31,064,721
2009	70	\$1,891,847	253	\$12,454,945	275	\$11,441,793	194	\$10,940,121		Confidential		Confidential	848	\$38,979,714
2010	76	\$2,686,470	273	\$16,686,483	280	\$16,613,346	189	\$6,159,568	53	\$3,245,639		\$0	871	\$45,391,507
2011	82	\$3,324,048	287	\$11,502,226	270	\$13,858,595	194	\$7,125,129	53	\$3,016,825		\$0	886	\$38,826,823
2012	86	\$2,416,139	279	\$9,555,645	270	\$12,760,064	200	\$7,252,415	57	\$2,386,535		\$0	892	\$34,370,798
2013	79	\$2,673,876	267	\$9,085,009	257	\$9,729,629	188	\$8,628,352		Confidential		Confidential	850	\$32,731,591

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Bristol Bay Salmon Set Gillnet (S04T)

Year	Togiak		Nushagak		Naknek-Kvichak		Egegik		Ugashik		Other		Total	
	Permits	Real Gross Earnings	Permits	Real Gross Earnings	Permits	Real Gross Earnings	Permits	Real Gross Earnings	Permits	Real Gross Earnings	Permits	Real Gross Earnings	Permits	Real Gross Earnings
2014	78	\$2,576,388	275	\$17,358,261	270	\$22,919,306	198	\$7,486,393	74	\$2,626,702		\$0	895	\$52,967,052
2015	82	\$1,222,814	277	\$8,226,929	278	\$10,172,520	194	\$5,702,709	58	\$1,895,282		\$0	889	\$27,220,254
2016	78	\$2,980,534	280	\$16,708,583	264	\$13,019,939	189	\$9,512,091	52	\$3,455,520		\$0	863	\$45,676,668
2017	80	\$3,230,675	284	\$24,597,868	272	\$19,202,560	189	\$12,960,786	59	\$3,785,514		\$0	884	\$63,777,405
2018	78	\$5,007,204	299	\$38,842,531	268	\$17,274,417	183	\$10,193,470	56	\$4,544,151		\$0	884	\$75,861,773
2019	82	\$5,935,194	308	\$30,577,376	257	\$25,792,368	189	\$21,730,362	58	\$3,437,879		\$0	894	\$87,473,180
2020	76	\$1,720,719	287	\$13,895,420	247	\$17,090,460	181	\$10,358,685	52	\$2,966,383		\$0	843	\$46,031,667
2021	72	\$3,916,935	297	\$29,395,998	255	\$22,292,753	191	\$11,366,225	59	\$5,297,158		\$0	874	\$72,269,070
2022	71	\$2,356,346	298	\$27,664,962	246	\$24,535,828	179	\$20,080,667	62	\$4,753,612		\$0	856	\$79,391,414
2023	63	\$1,103,742	293	\$9,950,425	248	\$10,079,084	189	\$7,086,348	55	\$1,305,144		\$0	848	\$29,524,742
2024	57	\$1,652,262	288	\$15,021,776	250	\$9,181,908	179	\$5,658,534	48	\$2,291,007		\$0	822	\$33,805,488

- Adjusted for inflation to 2025 dollars using U.S. Bureau of Labor Statistics Consumer Price Index. Some permits are used to record landings in more than one district.

Chapter 3 Permit Holdings in Both Bristol Bay Salmon Fisheries.

Because of their established fishing history in multiple fisheries prior to limitation, some initial permit holders were issued permits in more than one fishery. Table 3-1 provides counts of permit holders who were issued permits in only one fishery or in both Bristol Bay salmon fisheries.

Table 3-1. Initial Issuance of Permits in the Bristol Bay Salmon Fisheries

Drift Gillnet Only	1,723
Set Gillnet Only	889
Both Fisheries	151

Table 3-2 shows the counts of individuals who either owned or fished a permit in both Bristol Bay fisheries at some point. Total participation is shown in both fisheries for perspective. The number of dual permit owners for a given year is the number of individuals who on the *last day* of the year owned both permit types.

Table 3-2. Held and Fished Salmon Permits in Bristol Bay

	S03T	S04T	Dual	Dual
Year	Participants	Participants	Participants	Permit Owners
1975	1252	429	23	51
1976	1362	512	23	67
1977	1363	496	21	71
1978	1587	660	21	55
1979	1731	778	22	36
1980	1782	814	21	26
1981	1812	856	25	25
1982	1813	873	20	18
1983	1818	884	11	18
1984	1838	879	11	16
1985	1834	888	14	14
1986	1861	888	6	15
1987	1863	920	7	14
1988	1874	939	6	12
1989	1889	995	6	13
1990	1908	991	7	12
1991	1900	967	.	7
1992	1925	1005	4	8
1993	1931	992	1	8
1994	1924	958	3	7
1995	1928	995	4	7
1996	1922	964	1	8
1997	1914	946	1	9
1998	1887	916	2	11
1999	1876	931	3	10

	S03T	S04T	Dual	Dual
Year	Participants	Participants	Participants	Permit Owners
2000	1843	934	1	10
2001	1577	842	7	13
2002	1187	683	3	16
2003	1432	770	6	16
2004	1471	801	7	16
2005	1556	834	7	23
2006	1595	855	8	23
2007	1651	847	8	22
2008	1665	854	5	23
2009	1642	858	2	23
2010	1757	816	5	21
2011	1785	796	3	14
2012	1764	787	4	16
2013	1738	856	1	14
2014	1778	884	3	15
2015	1775	893	.	14
2016	1734	872	2	14
2017	1762	892	3	16
2018	1777	888	5	21
2019	1795	906	5	19
2020	1736	850	1	15
2021	1770	874	1	17
2022	1789	862	.	17
2023	1730	847	1	17
2024	1697	827	1	16

Appendix A. Dual and Stacked Permit Regulations

Dual Permits:					
Fishery and Fishery Code	First Season in Effect	Basic Regulation	Identification	Special Considerations	Regulations
Kodiak Salmon Set Gillnet S04K	2 regulations: (a) 1985 and (b) 2008 then 2010:	(a) Two permit holders may fish in a joint venture; the operation's total allowable gear increases from 2 nets and 150 fathoms to 3 nets and to 300 fathoms (b) Permit holders may own and fish 2 permits simultaneously. Their allowable gear doubles from 2 nets and 150 fathoms to 4 nets and 300 fathoms. Board of Fish allowed stacked permit regulation to sunset in 2010	(a) Gillnet buoys must be marked with a 'D' and with both permit numbers when the operation fishes 2 permits. (b) In 2008 persons who fished 2 permits were issued 2 permit cards: a standard card and a white-colored (non-functioning) card. In 2009, the non-functioning card was yellow-colored. In 2010, persons were issued 2 standard cards, and either could be used to record a landing.	(b) Permit stacking regulation sunset in 2010 and is no longer allowed	(a) 5 AAC 18.331
Bristol Bay Salmon Drift Gillnet S03T	2004	Two permit holders may fish from a single vessel; the vessel's total allowable gear increases from 150 to 200 fathoms	Vessels display a 'D' adjacent to the license plate when fishing 2 permits. Otherwise, the 'D' is to be covered. Must register with F&G prior to fishing.	Dual-permit operations are not allowed in certain restricted fishing areas	5 AAC 06.333 5 AAC 06.370
Cook Inlet Salmon Drift Gillnet S03H	2008	Two permit holders may fish from a single vessel; the vessel's total allowable gear increases from 150 to 200 fathoms	Vessels display a 'D' adjacent to the license plate when fishing 2 permits. Otherwise, the 'D' is to be covered.	Dual-permit operations are not allowed in certain restricted fishing areas	5 AAC 21.333

Appendix A. Dual and Stacked Permit Regulations

Dual Permits:					
Fishery and Fishery Code	First Season in Effect	Basic Regulation	Identification	Special Considerations	Regulations
Southeast Herring Gillnet G34A	2006	Two permit holders may fish from a single vessel; the vessel's allowable gear increases from a single 50-fathom net to a 75-fathom net.	Vessels display the letter 'D' adjacent to the license plate when fishing 2 permits. Otherwise, the 'D' is to be covered.		5 AAC 27.131(i)
Prince William Sound Salmon Seine S01E	2022	Two permit holders may fish from a single vessel; the vessel's allowable gear increases from 225 fathoms to 250 fathoms	Vessels display a 'D' adjacent to the license plate when fishing 2 permits. Otherwise, the 'D' is to be covered	In times of conservation, the allowable gear may be restricted to 225 fathoms.	

Appendix A. Dual and Stacked Permit Regulations

Stacked Permits

2002: AS 16.43.140 (c) was amended to allow individuals to hold two salmon limited entry permits in the same fishery.

2006: AS 16.05.251 (i) gives the BOF the authority to grant fishing privileges to the second permit held by an individual.

Fishery and Fishery Code	First Season in Effect	Basic Regulation	Identification	Special Considerations	Regulations
Bristol Bay Salmon Set Gillnet S04T	2010	Permit holders may own and fish 2 permits simultaneously. Their allowable gear doubles from 2 nets and 50 fathoms to 4 nets and 100 fathoms.	Persons who fish 2 permits are issued 2 permit cards. Each are standard cards and either can be used to record a landing. Gillnet buoys must be marked with a 'D' and with both permit numbers when the operation fishes 2 permits.	(u) "...the provisions of this subsection do not apply after December 31, 2012." (did expire in 2012)	5 AAC 06.331(u)
Cook Inlet Salmon Drift Gillnet S03H	2017	Permit holders may own and fish 2 permits simultaneously. Their allowable gear increases from 150 (with 1 permit) to 200 fathoms of drift gillnet gear.	Vessels display a 'D' adjacent to the license plate when fishing 2 permits. Otherwise, the 'D' is to be covered		5 AAC 21.333(a)
Cook Inlet Salmon Set Gillnet S04H	2011	Permit holders may own and fish 2 permits simultaneously. Their allowable gear doubles from 4 nets and 105 fathoms to 210 fathoms in aggregate, with no single net longer than 35 fathoms, of which no more than 105 fathoms may be more than 29 meshes in depth in the Upper Subdistrict. (Depth modification made by Board-Generated Proposal A at the 2014 Upper Cook Inlet Finfish meeting).	Persons who fish 2 permits are issued 2 permit cards. Each are standard cards and either can be used to record a landing. Gillnet buoys must be marked with a 'D' and with both permit numbers when the operation fishes 2 permits. The identification buoy attached to gillnet gear of no more than 29 meshes in depth must be marked with a "D 29" following the CFEC permit holder's permit number.		5 AAC 21.331

*Appendix A. Dual and Stacked Permit Regulations***Stacked Permits**

2002: AS 16.43.140 (c) was amended to allow individuals to hold two salmon limited entry permits in the same fishery.

2006: AS 16.05.251 (i) gives the BOF the authority to grant fishing privileges to the second permit held by an individual.

Fishery and Fishery Code	First Season in Effect	Basic Regulation	Identification	Special Considerations	Regulations
Yakutat Salmon Set Gillnet S04D	2012	Permit holders may own and fish 2 permits simultaneously. Their allowable gear doubles from 4 nets and 105 fathoms to 210 fathoms in aggregate, with no single net longer than 35 fathoms.	Persons who fish 2 permits are issued 2 permit cards. Each are standard cards and either can be used to record a landing. Gillnet buoys must be marked with a 'D' and with both permit numbers when the operation fishes 2 permits. Valid only for Situk, Yakutat Bay, and Kaliakh, and only if Situk Chinook escapement exceeds 750 fish.	(e) Unless reauthorized, this regulation expires December, 2017 Update: This provision was repealed 6/17/2018 so stacking is still allowed	5 AAC 30.345

Dear Members of the Alaska Board of Fisheries,

My name is Dustin Connor. I am a lifelong Alaskan and a commercial fisherman with 27 years of experience, including 14 seasons in Bristol Bay and 11 seasons as an owner/operator in the drift gillnet fleet. I submit this testimony as both formal written comment and an annotated response to the Bristol Bay Finfish Proposals numbered 44 through 105.

My comments are based on direct on-the-water experience and on the Department's own published science, management plans, and regulatory findings, including Alaska Department of Fish and Game (ADF&G) Special Publications, Bristol Bay Science and Research Institute (BBSRI) performance assessments, and applicable sections of 5 AAC.

User-Group Priority Framework

All comments that follow evaluate proposals using the following priority of use, listed from highest to lowest:

1. Commercial drift gillnet fleet
2. Subsistence users
3. Commercial set gillnet fleet
4. Local resident recreational anglers
5. Non-resident sport and recreational anglers
6. Charter and self-guided charter operations

This priority reflects long-standing Alaska constitutional principles, historical access, economic reliance, enforceability, and conservation accountability.

Analytical Standard

Each proposal is evaluated using the same criteria:

- Conservation effectiveness based on best available science
- Enforceability and management clarity
- On-the-water efficiency and safety
- Equity in allocation and conservation burden
- Long-term precedent and cumulative impact

Where available, biological and management impacts are cited directly to ADF&G and BBSRI publications, including Special Publication No. 25-18 and associated performance assessments of the Nushagak District King Salmon Stock of Concern Management Plan .

General Observation

Recent ADF&G and BBSRI evaluations document that commercial fisheries, and particularly the drift fleet, have already absorbed substantial conservation measures through delayed openings, reduced fishing time, mesh restrictions, and inseason closures. Commercial Chinook salmon harvest has declined sharply relative to historical averages, while uncertainty in inseason assessment and declining stock productivity remain key drivers of current conditions.

Further regulatory changes must therefore be evaluated carefully to avoid disproportionately increasing restrictions on the most regulated and enforceable user group while providing limited or no conservation benefit.

Structure of Proposal Responses

For clarity and transparency, each proposal response below includes:

- A plain-language summary of the proposal
- Relevant regulatory and biological context
- Ranked impacts by user group
- A clear position: Support, Oppose, or Support with Conditions
- A concise, evidence-based rationale

Proposal-specific responses begin below.

Proposal 44 – Limit King Salmon Retention and Require Reporting in Subsistence and Personal Use Fisheries

Summary

Proposal 44 would impose annual retention limits and mandatory reporting requirements on king salmon harvested in the personal use subsistence fishery.

Regulatory and Biological Context

ADF&G has designated the Nushagak River Chinook salmon stock as a Stock of Concern and has acknowledged that there is currently no established Amount Necessary for Subsistence (ANS) for king salmon. This proposal attempts to impose new subsistence restrictions without first establishing that baseline.

Drift Fleet Impact

This proposal does not improve conservation outcomes for the drift fleet. Instead, it introduces new social and allocation conflict without increasing escapement certainty or management effectiveness. The drift fleet is already subject to the most restrictive and enforceable conservation measures.

Position

Oppose

Rationale

Without an established ANS, imposing new subsistence limits and reporting requirements is premature and shifts focus away from fisheries where discretionary harvest and enforcement gaps remain. Conservation responsibility should not be expanded in a way that undermines subsistence priority or fails to benefit the drift fleet .

Proposal 45 – Extend Registration Period in the Naknek–Kvichak District

Summary

Proposal 45 would extend the registration and reregistration deadline in the Naknek–Kvichak District from July 17 to July 22.

Regulatory and Biological Context

Registration deadlines control access and participation across Bristol Bay districts. Drift fishermen depend on the ability to move between districts as runs peak and decline.

Drift Fleet Impact

Extending the registration period restricts drift fleet mobility and effectively concentrates access among fishermen already registered in the Naknek–Kvichak District. As other districts slow or close, this proposal limits drift fishermen's ability to follow fish and maintain economic viability.

Position

Oppose

Rationale

This proposal functions as an access limitation rather than a conservation tool and favors fixed participation over fleet mobility, which is central to the drift fishery model .

Proposal 46 – Extend Allocation Plan Dates in the Naknek–Kvichak District

Summary

Proposal 46 would extend the Naknek–Kvichak District allocation plan regulatory period from July 17 to July 22.

Regulatory and Biological Context

Allocation plans should balance opportunity while preserving fleet mobility across Bristol Bay. Extending allocation periods can unintentionally consolidate access.

Drift Fleet Impact

This proposal limits late-season access for drift fishermen transitioning from other districts and advantages those already established in the Naknek–Kvichak District. It reduces drift fleet flexibility without providing clear conservation benefit.

Position

Oppose

Rationale

Extending allocation restrictions concentrates opportunity and limits drift fleet access during a critical period when other districts have slowed or closed .

Proposal 47 – Extend Emergency Order–Only Fishing Period in the Naknek–Kvichak District

Summary

Proposal 47 would extend the period during which fishing may only occur by emergency order from July 17 to July 22.

Regulatory and Biological Context

Emergency order authority is intended to provide management flexibility, not function as a prolonged access control mechanism.

Drift Fleet Impact

Extending EO-only management disproportionately impacts drift fishermen attempting to enter the district late in the season. This concentrates opportunity among vessels already present and limits fair access across the drift fleet.

Position

Oppose

Rationale

Prolonged EO-only periods restrict drift fleet mobility and consolidate access without demonstrated conservation gains.

—

Proposal 48 – Modify Kvichak River Special Harvest Area Fishing Ratios and Gear Removal Distance

Summary

Proposal 48 would modify the Kvichak River Special Harvest Area (KRSHA) to:

- 1) establish a seasonal ratio of three drift gillnet fishing periods to every one set gillnet fishing period; and
- 2) reduce the distance that unused set gillnet gear must be removed from shore from 500 feet to 30 feet.

Regulatory and Biological Context

Special Harvest Areas are intended to prevent overescapement while allowing efficient harvest of surplus sockeye salmon. In river systems, sockeye concentrate along shorelines, and large offshore anchor buffers materially reduce drift efficiency without providing additional conservation benefit.

Drift Fleet Impact

Reducing the gear-removal distance from 500 feet to 30 feet significantly improves drift safety, efficiency, and effectiveness by allowing access to fish traveling along the banks. The proposed 3:1 drift-to-set ratio reflects expected participation levels and recognizes the drift fleet's greater mobility and ability to respond to management needs.

Position

Support with Conditions

Rationale

The reduction in gear-removal distance is strongly supported and corrects a poorly suited buffer borrowed from other river systems. The fixed 3:1 ratio is acceptable in the near term but should include periodic review to avoid locking in allocation outcomes if participation patterns change. Ratios should not become precedent divorced from actual fleet participation .

Proposal 49 – Establish a Dynamic Fishing Period Ratio in the Kvichak River Special Harvest Area

Summary

Proposal 49 would replace a fixed fishing-period ratio in the KRSHA with a dynamic system that adjusts drift-to-set openings based on actual gear participation.

Regulatory and Biological Context

ADF&G management plans routinely account for participation and effort when allocating opportunity. Static ratios can misallocate fishing time when fleet composition changes during the season.

Drift Fleet Impact

This proposal directly benefits the drift fleet by ensuring fishing opportunity tracks actual participation. As drift participation increases, opportunity increases proportionally, avoiding situations where mobile drift vessels are constrained by ratios designed for different fleet sizes.

Position

Support

Rationale

Participation-based ratios are more equitable, biologically neutral, and operationally sound than fixed ratios. This approach better reflects real fishing conditions and avoids unintended consolidation of opportunity .

Proposal 50 – Incorporate Fish Quality and Product Value into Bristol Bay Salmon Management

Summary

Proposal 50 would direct ADF&G to manage the Bristol Bay commercial salmon fishery to maximize product value and minimize waste.

Regulatory and Biological Context

Statewide fisheries policy already recognizes the importance of economic sustainability (5 AAC 39.222). Fish quality directly affects ex-vessel value, market access, and long-term fleet viability.

Drift Fleet Impact

Explicitly recognizing quality objectives supports management decisions that discourage practices such as round-hauling and excessive onboard handling that degrade fish quality and depress prices for the drift fleet.

Position

Support

Rationale

Including product quality and value in management objectives strengthens the economic sustainability of the drift fleet without undermining conservation goals and aligns Bristol Bay management with existing statewide policy .

—

Proposal 51 – Allow Additional Drift Gillnet Gear Onboard in the Kvichak River Special Harvest Area

Summary

Proposal 51 would allow drift vessels fishing in the Kvichak River Special Harvest Area (KRSHA) to carry additional drift gillnet gear onboard, provided the excess gear is stored in net bags or brailer bags and not actively fished.

Regulatory and Biological Context

Existing regulations limit onboard gear to 150 fathoms regardless of whether the vessel is actively fishing multiple districts or permits. This creates inefficiency when vessels must offload gear solely to comply with transport limits.

Drift Fleet Impact

Allowing additional gear onboard improves operational efficiency, safety, and flexibility for drift vessels transitioning in and out of the KRSHA. Requiring storage in net or brailer bags prevents fishing of excess gear and protects fish quality.

Position

Support

Rationale

This proposal improves drift efficiency without increasing fishing power or conservation risk and aligns with existing quality-focused management objectives .

Proposal 52 – Create the Upper Egegik River Sockeye Salmon Special Harvest Area

Summary

Proposal 52 would establish the Upper Egegik River Special Harvest Area (UESHA) to prevent overescapement while maintaining allocation goals by providing an additional inseason management tool.

Regulatory and Biological Context

ADF&G has documented historical overescapement in the Egegik system. Special Harvest Areas are an established tool to harvest surplus sockeye while preserving escapement and allocation objectives.

Drift Fleet Impact

This proposal benefits the drift fleet by providing additional opportunity to harvest surplus fish without restricting fishing in other districts. It preserves drift mobility and avoids reallocating harvest away from active fisheries.

Position
Support

Rationale

The UESHA provides managers with a flexible, conservation-neutral tool to prevent waste through overescapement while maintaining drift access and allocation balance .

Proposal 53 – Close a Portion of the Egegik District to Mitigate Illegal Fishing Activity

Summary

Proposal 53 would authorize ADF&G to close a defined portion of the Egegik District to address persistent illegal fishing activity when enforcement resources are insufficient.

Regulatory and Biological Context

ADF&G and Alaska Wildlife Troopers have documented repeated late-season illegal fishing activity in specific boundary areas, resulting in district-wide closures that penalize compliant fishermen.

Drift Fleet Impact

Targeted closures protect law-abiding drift fishermen by preventing full-district shutdowns caused by a small number of chronic violators. This improves fairness and enforcement effectiveness.

Position
Support

Rationale

Providing managers with targeted enforcement tools protects compliant drift fishermen and reduces unnecessary economic loss caused by blanket closures .

Proposal 54 – Repeal the Nushagak River Coho Salmon Management Plan

Summary

Proposal 54 would repeal the Nushagak River Coho Salmon Management Plan due to the lack of current escapement enumeration and the plan's inability to function as written.

Regulatory and Biological Context

ADF&G has not conducted consistent coho escapement enumeration on the Nushagak River since 2018 and has recommended discontinuing the escapement goal due to insufficient data.

Drift Fleet Impact

The existing plan no longer provides meaningful guidance and creates the appearance of management structure without enforceable biological benchmarks. Repeal avoids reliance on outdated or unsupported triggers.

Position

Support

Rationale

Maintaining a management plan without data undermines credibility and does not benefit conservation or drift fleet stability .

Proposal 55 – Remove References to the Nushagak River Coho Salmon Management Plan

Summary

Proposal 55 would remove remaining regulatory references to the repealed Nushagak River Coho Salmon Management Plan.

Regulatory and Biological Context

If the plan is repealed, residual references create confusion and regulatory inconsistency.

Drift Fleet Impact

Removing obsolete references improves regulatory clarity and avoids misapplication of defunct management provisions.

Position

Support

Rationale

This proposal ensures regulatory consistency following repeal of the coho management plan and avoids ambiguity in drift fishery management .

Proposal 56 – Permanently Adopt Offshore Set Gillnet Boundary Locations in the Nushagak District

Summary

Proposal 56 would remove the sunset clause and permanently adopt fixed offshore boundary coordinates for set gillnet operations on Ekuk Beach.

Regulatory and Biological Context

The current boundary system has improved enforceability by replacing shifting tidal benchmarks with fixed coordinates.

Drift Fleet Impact

Fixed boundaries provide clarity and predictability for drift vessels operating near set gillnets, reducing conflict and enforcement disputes.

Position

Support

Rationale

Clear, enforceable boundaries benefit both drift and setnet fleets and reduce gear conflict and enforcement ambiguity .

Proposal 57 – Apply Set Gillnet Offshore Boundary Coordinates to Drift Gillnet Operations

Summary

Proposal 57 would prohibit drift gillnet vessels from operating shoreward of established set gillnet offshore boundary coordinates and prohibit contact with set gillnet gear.

Regulatory and Biological Context

Existing boundaries define set gillnet limits but do not explicitly restrict drift vessel operations relative to those same coordinates.

Drift Fleet Impact

This proposal materially restricts drift fishing area and operational flexibility while providing limited additional conservation or safety benefit. Existing laws already prohibit gear interference and unsafe operations.

Position

Oppose

Rationale

Applying fixed offshore boundaries to drift operations unnecessarily reduces available fishing water and imposes additional access restrictions on the drift fleet without demonstrated need or benefit .

—

Proposal 58 – Modify the Trigger to Open the Wood River Special Harvest Area

Summary

Proposal 58 would modify the in-season trigger to open the Wood River Special Harvest Area (WRSHA) so that it aligns with the Wood River Optimal Escapement Goal (OEG) when that goal is in use during very large runs.

Regulatory and Biological Context

ADF&G adopted an OEG for the Wood River sockeye run in years when total run size is estimated to exceed five million fish. Under current regulation, the trigger to open the WRSHA does not adjust when the OEG replaces the Sustainable Escapement Goal (SEG), creating a mismatch between management intent and in-season action.

Drift Fleet Impact

When the WRSHA opening trigger does not reflect the OEG, drift fishermen are delayed from accessing surplus sockeye, increasing the risk of overescapement and foregone harvest. This reduces efficiency and places unnecessary constraints on the drift fleet during large runs.

Position

Support

Rationale

Aligning the WRSHA trigger with the applicable escapement goal improves management consistency, reduces waste from overescapement, and preserves timely drift access to surplus fish without increasing conservation risk .

Proposal 59 – Ensure Drift Gillnet Opportunity in the Wood River Special Harvest Area

Summary

Proposal 59 would require alternating access between drift and set gillnet gear in the WRSHA once it is open, regardless of allocation status, when the Nushagak District and WRSHA are open simultaneously.

Regulatory and Biological Context

Current WRSHA regulations allow the gear group behind in allocation to fish first and continue fishing as long as it remains behind. Due to relatively fixed setnet participation and highly variable drift participation, this has resulted in set gillnets receiving the majority of WRSHA openings.

Drift Fleet Impact

Under the existing structure, the drift fleet has received little to no access to the WRSHA in many seasons, despite high participation and surplus sockeye availability. This results in inequitable access and undermines the purpose of the special harvest area.

Position

Support

Rationale

Alternating access ensures that the WRSOA functions as a true surplus harvest tool for both gear groups and prevents one gear type from capturing nearly all opportunity due to participation dynamics unrelated to conservation .

Proposal 60 – Increase Set Gillnet Length in the Wood River Special Harvest Area

Summary

Proposal 60 would increase allowable set gillnet length in the WRSOA from 25 fathoms to 37.5 fathoms.

Regulatory and Biological Context

When the WRSOA was created, shorter set gillnets were justified due to concurrent fishing with drift gear. Since gear types now fish separately, the original conflict-reduction rationale no longer applies.

Drift Fleet Impact

Increasing set gillnet length expands fixed-gear fishing power in the WRSOA without providing corresponding access or efficiency improvements for the drift fleet. This risks shifting surplus harvest toward stationary gear at the expense of mobile drift operations.

Position

Oppose

Rationale

Expanding set gillnet length in the WRSOA reallocates harvest opportunity toward fixed gear without addressing drift access limitations and is inconsistent with a drift-first management approach .

—

Proposal 61 – Modify Commercial Fishing Restrictions Under the Nushagak District King Salmon Stock of Concern Plan

Summary

Proposal 61 would impose additional commercial fishing restrictions in the Nushagak District when the Chinook salmon run is projected to be below the lower end of the escapement goal range.

Regulatory and Biological Context

ADF&G has designated the Nushagak River Chinook salmon stock as a Stock of Concern and implemented a multi-year management plan that already includes delayed openings, reduced fishing time, and in-season closures. Chinook salmon have a 4–7 year life cycle, and the current plan has only been in effect for three seasons.

Drift Fleet Impact

The drift fleet has already absorbed substantial conservation burden under the existing SOC plan. Further automatic restrictions reduce fishing opportunity and economic viability while providing diminishing conservation returns. Commercial harvest reductions cannot address productivity-driven declines.

Position

Oppose

Rationale

The existing SOC plan has not been in place long enough to evaluate effectiveness over a full Chinook generation. Additional restrictions on the drift fleet are premature and risk further concentrating conservation burden on the most regulated user group .

Proposal 62 – Require Additional Commercial Fishing Closures to Protect Nushagak River Chinook Salmon

Summary

Proposal 62 would require expanded time and area closures for commercial fisheries in the Nushagak District during periods of low Chinook abundance.

Regulatory and Biological Context

ADF&G has documented that in some recent years the inriver Chinook escapement goal would not have been achievable even with zero harvest by any user group. This indicates that factors outside commercial harvest are driving stock status.

Drift Fleet Impact

This proposal further restricts drift access without addressing productivity, marine survival, or freshwater habitat factors. Repeated closures disproportionately impact mobile drift fishermen while offering limited additional escapement benefit.

Position

Oppose

Rationale

Expanded commercial closures shift conservation burden onto the drift fleet without demonstrable biological benefit and ignore documented limits of harvest-based recovery under current conditions .

Proposal 63 – Extend King Salmon Protection Measures Later into the Commercial Fishing Season

Summary

Proposal 63 would extend Chinook protection measures later into the commercial fishing season regardless of in-season run indicators.

Regulatory and Biological Context

Current regulations already delay commercial openings and reduce fishing time during peak Chinook vulnerability. ADF&G and BBSRI have both documented significant uncertainty in in-season Chinook assessment methods.

Drift Fleet Impact

Automatically extending protection measures later into the season limits drift opportunity during periods when Chinook vulnerability may already be reduced and sockeye abundance is high. This increases economic harm without clear conservation gain.

Position

Oppose

Rationale

Rigid extensions of protection measures reduce management flexibility and further penalize the drift fleet based on uncertain in-season indicators rather than biological necessity .

Proposal 64 – Modify Allocation Framework During King Salmon Stock of Concern Conditions

Summary

Proposal 64 would alter allocation priorities during periods when the Nushagak River Chinook stock is designated as a Stock of Concern.

Regulatory and Biological Context

Allocation changes under SOC conditions risk becoming permanent precedent even after stock status improves. Allocation decisions should remain separate from conservation designation unless explicitly supported by biological evidence.

Drift Fleet Impact

This proposal risks reallocating opportunity away from the drift fleet during SOC years without guaranteeing restoration once stock status improves. It introduces long-term allocation risk unrelated to conservation effectiveness.

Position

Oppose

Rationale

Conservation designations should not be used as mechanisms for reallocation. Allocation changes during SOC periods create lasting impacts that outlive the conservation concern .

Proposal 65 – Require Additional Restrictions on Commercial Fisheries to Achieve Chinook Escapement Goals

Summary

Proposal 65 would mandate further commercial fishing restrictions when Chinook escapement goals are projected to be missed.

Regulatory and Biological Context

ADF&G has documented that the drift fleet has already experienced major harvest reductions and delayed openings under the existing SOC framework. Chinook escapement shortfalls have occurred even in the absence of commercial fishing.

Drift Fleet Impact

This proposal compounds economic harm to the drift fleet without addressing the underlying drivers of Chinook decline. Additional restrictions further concentrate conservation responsibility on the most regulated sector.

Position

Oppose

Rationale

Mandating further commercial restrictions ignores biological realities and places disproportionate burden on the drift fleet while offering minimal likelihood of achieving escapement goals under current productivity conditions .

—

Proposal 66 – Extend Sport Fishing Restrictions for King Salmon in the Nushagak District

Summary

Proposal 66 would extend sport fishing restrictions for king salmon in the Nushagak District during periods when the stock is designated as a Stock of Concern.

Regulatory and Biological Context

ADF&G has documented that sport fishing restrictions, including bait bans and closures, are already implemented under the current SOC framework. Enforcement coverage in remote areas remains limited, and harvest and release mortality are difficult to quantify with precision.

Drift Fleet Impact

While this proposal does not directly restrict the drift fleet, it highlights the imbalance in enforcement and accountability between commercial and sport fisheries. Without corresponding improvements in enforcement, additional sport restrictions provide limited conservation benefit while continued pressure remains unmeasured.

Position

Support with Conditions

Rationale

Sport restrictions should only be extended if accompanied by measurable improvements in enforcement presence, reporting accuracy, and accountability. Conservation measures that cannot be effectively enforced do not equitably distribute conservation burden .

Proposal 67 – Modify Sport Fishing Methods for King Salmon in the Nushagak District

Summary

Proposal 67 would further restrict allowable sport fishing methods for king salmon in the Nushagak District during SOC conditions.

Regulatory and Biological Context

ADF&G recognizes that catch-and-release mortality contributes to Chinook impacts, particularly in spawning systems. However, reliable quantification of release mortality in the Nushagak District remains limited.

Drift Fleet Impact

The drift fleet has already absorbed major conservation reductions, while sport fisheries continue to operate with limited monitoring. Additional method restrictions without enhanced enforcement risk symbolic regulation rather than meaningful conservation.

Position

Support with Conditions

Rationale

Any expansion of sport method restrictions must be paired with increased enforcement and mandatory reporting to ensure conservation benefits are real and not simply assumed .

Proposal 68 – Require Additional Sport Fishing Closures During King Salmon Stock of Concern Conditions

Summary

Proposal 68 would require additional sport fishing closures in the Nushagak District when king salmon abundance is low.

Regulatory and Biological Context

Sport fishing closures are already used as a management tool under the SOC plan. ADF&G has noted uncertainty in in-season Chinook assessment and limited enforcement coverage in some areas.

Drift Fleet Impact

This proposal acknowledges that conservation responsibility must extend beyond the commercial fleet. However, without enforcement capacity, closures risk uneven compliance and continued unaccounted impacts.

Position

Support with Conditions

Rationale

Closures should be implemented only when enforcement resources are sufficient to ensure compliance and when impacts are documented, not assumed .

Proposal 69 – Modify Personal Use Salmon Fishing Regulations in the Nushagak District

Summary

Proposal 69 would modify personal use salmon fishing regulations during periods of Chinook conservation concern.

Regulatory and Biological Context

ADF&G has identified personal use fisheries as a component of overall harvest but has limited data on effort, compliance, and post-harvest use during conservation periods.

Drift Fleet Impact

Further restricting personal use fisheries does not materially benefit the drift fleet and risks increasing allocation conflict without improving escapement outcomes.

Position
Oppose

Rationale

Absent clear evidence that personal use fisheries are preventing escapement achievement, additional restrictions are unlikely to improve conservation and may undermine public support for balanced management .

Proposal 70 – Establish New Reporting Requirements for Personal Use Fisheries

Summary

Proposal 70 would require additional reporting for personal use salmon harvests.

Regulatory and Biological Context

Accurate harvest data is necessary for effective management. However, reporting requirements must be enforceable and proportional to conservation benefit.

Drift Fleet Impact

While improved data collection is generally beneficial, imposing reporting mandates without enforcement capacity risks creating uneven compliance and limited data quality, while the drift fleet remains fully accountable and monitored.

Position
Oppose

Rationale

Reporting requirements should be implemented only when enforcement and compliance mechanisms are sufficient to ensure accurate data collection across all user groups .

—

Proposal 71 – Modify Nushagak District Commercial Fishing Time During King Salmon Conservation Periods

Summary

Proposal 71 would further restrict commercial fishing time in the Nushagak District during periods of Chinook salmon conservation concern.

Regulatory and Biological Context

ADF&G has already implemented delayed openings, reduced fishing time, and inseason closures under the existing King Salmon Stock of Concern Management Plan. Available data

show that Chinook escapement shortfalls have occurred even in years with minimal or no commercial harvest.

Drift Fleet Impact

This proposal directly reduces drift fishing opportunity during periods when other Bristol Bay districts have slowed or closed, further limiting the drift fleet's ability to remain economically viable while providing minimal additional conservation benefit.

Position

Oppose

Rationale

Additional reductions in commercial fishing time further concentrate conservation burden on the drift fleet without addressing productivity-driven declines or improving escapement certainty .

Proposal 72 – Modify Nushagak District Commercial Fishing Area Boundaries During King Salmon Conservation Periods

Summary

Proposal 72 would further restrict commercial fishing areas in the Nushagak District during periods of Chinook salmon conservation concern.

Regulatory and Biological Context

Area restrictions are already used as a conservation tool under existing regulations. ADF&G has documented uncertainty in inseason Chinook assessment and limited ability to precisely target restrictions without affecting sockeye harvest.

Drift Fleet Impact

Reducing available fishing area increases congestion, gear conflict, and safety risk for drift vessels while decreasing harvest efficiency. These impacts disproportionately affect the mobile drift fleet.

Position

Oppose

Rationale

Additional area restrictions reduce drift access and efficiency without demonstrable conservation benefit and increase operational risk for drift fishermen .

Proposal 73 – Establish Additional Conservation-Based Closures in the Nushagak District

Summary

Proposal 73 would mandate new conservation-based closures in the Nushagak District during periods of low Chinook abundance.

Regulatory and Biological Context

ADF&G has documented that existing closures and delayed openings have already significantly reduced commercial Chinook harvest. Further closures do not address non-harvest-related drivers of stock decline.

Drift Fleet Impact

Mandatory closures further limit drift fleet opportunity and concentrate access among vessels already positioned in unaffected areas, increasing economic inequity within the fleet.

Position

Oppose

Rationale

Conservation closures that do not measurably improve escapement outcomes shift burden to the drift fleet without addressing underlying biological constraints .

Proposal 74 – Modify Allocation During King Salmon Stock of Concern Conditions

Summary

Proposal 74 would alter allocation priorities during periods when the Nushagak River Chinook stock is designated as a Stock of Concern.

Regulatory and Biological Context

Allocation changes made during conservation designations risk becoming permanent precedent. Allocation decisions should remain distinct from conservation tools unless explicitly supported by biological necessity.

Drift Fleet Impact

This proposal risks reallocating opportunity away from the drift fleet under the guise of conservation, with no guarantee of restoration once stock status improves.

Position

Oppose

Rationale

Conservation designations should not be used to restructure allocation. Doing so creates lasting impacts unrelated to escapement outcomes .

Proposal 75 – Establish Additional Inseason Triggers for Commercial Fishing Restrictions

Summary

Proposal 75 would create new inseason triggers that automatically impose additional commercial fishing restrictions.

Regulatory and Biological Context

ADF&G has acknowledged significant uncertainty in inseason Chinook assessment and limitations in predictive accuracy.

Drift Fleet Impact

Automatic triggers reduce management flexibility and impose restrictions based on uncertain indicators, disproportionately impacting the drift fleet while providing limited conservation benefit.

Position

Oppose

Rationale

Rigid triggers tied to uncertain inseason data risk unnecessary closures and further concentrate conservation burden on the drift fleet .

—

Proposal 76 – Modify District Boundary Descriptions in the Nushagak District

Summary

Proposal 76 would revise district boundary descriptions in the Nushagak District to clarify management and enforcement authority.

Regulatory and Biological Context

Boundary clarity is essential for effective enforcement and inseason management. Ambiguous boundaries increase the likelihood of unintentional violations and inconsistent enforcement.

Drift Fleet Impact

Clear and consistent boundary definitions reduce enforcement conflict, improve safety, and provide certainty for drift vessels operating near district lines.

Position

Support

Rationale

Improved boundary clarity benefits the drift fleet by reducing enforcement ambiguity and operational risk without reallocating opportunity or increasing conservation pressure .

Proposal 77 – Modify District Boundary Markers Used for Enforcement

Summary

Proposal 77 would update or relocate physical or coordinate-based boundary markers used to define district fishing areas.

Regulatory and Biological Context

ADF&G and Alaska Wildlife Troopers rely on clear, enforceable boundary markers to ensure compliance. Inconsistent or poorly marked boundaries undermine effective enforcement.

Drift Fleet Impact

Accurate and well-defined markers protect drift fishermen from inadvertent violations and uneven enforcement, particularly during high-effort periods.

Position

Support

Rationale

Clear boundary markers improve enforceability and fairness without affecting conservation outcomes or allocation .

Proposal 78 – Adjust Commercial Fishing Periods in the Nushagak District

Summary

Proposal 78 would adjust the timing or structure of commercial fishing periods in the Nushagak District.

Regulatory and Biological Context

Fishing period structure directly affects fleet efficiency, safety, and harvest effectiveness. Adjustments must be supported by biological need or clear management benefit.

Drift Fleet Impact

Changes that further compress fishing periods increase congestion, safety risk, and gear conflict for the drift fleet, particularly during late-season fisheries.

Position

Oppose

Rationale

Absent a clear conservation or management benefit, further modification of fishing periods risks unnecessary disruption to drift operations and reduced efficiency .

Proposal 79 – Expand Management Authority to Close Additional Areas Inseason

Summary

Proposal 79 would grant expanded authority to close additional commercial fishing areas inseason.

Regulatory and Biological Context

ADF&G already possesses broad emergency order authority to manage fisheries inseason. Additional authority must be justified by demonstrated management gaps.

Drift Fleet Impact

Expanded closure authority increases uncertainty and risk for drift fishermen, particularly when closures are based on uncertain inseason indicators.

Position

Oppose

Rationale

Existing emergency order authority is sufficient. Expanding closure authority without clear justification increases instability and disproportionately impacts the drift fleet .

Proposal 80 – Modify Management Authority for Inseason Fishing Adjustments

Summary

Proposal 80 would alter how inseason fishing adjustments are authorized or implemented by managers.

Regulatory and Biological Context

Adaptive management relies on flexibility, transparency, and predictable application of authority.

Drift Fleet Impact

Changes that reduce predictability or expand discretionary authority increase operational uncertainty and economic risk for the drift fleet.

Position
Oppose

Rationale

Management authority should remain clear, limited, and predictable. Expanding discretionary adjustments without defined triggers or standards undermines stability for the drift fleet .

—

Proposal 81 – Modify Commercial Fishing Time Restrictions in the Egegik District

Summary

Proposal 81 would modify commercial fishing time restrictions in the Egegik District during periods of conservation concern.

Regulatory and Biological Context

ADF&G already manages Egegik fishing time through emergency orders based on escapement performance. Existing authority allows managers to reduce effort when conservation objectives are at risk.

Drift Fleet Impact

Further restricting fishing time limits the drift fleet's ability to access fish as other districts slow or close. Time compression increases congestion, safety risk, and economic pressure without demonstrated conservation gain.

Position
Oppose

Rationale

Additional time restrictions shift conservation burden onto the drift fleet without addressing biological drivers of stock performance and reduce fleet flexibility during critical late-season periods .

Proposal 82 – Modify Commercial Fishing Area Restrictions in the Egegik District

Summary

Proposal 82 would impose additional commercial fishing area restrictions in the Egegik District.

Regulatory and Biological Context

Area restrictions are already used by ADF&G when needed to meet escapement goals. Further restrictions must demonstrate clear conservation benefit to justify reduced access.

Drift Fleet Impact

Reducing available fishing area increases congestion, gear conflict, and safety risk for drift vessels while decreasing harvest efficiency.

Position

Oppose

Rationale

Additional area restrictions reduce drift access and efficiency without clear evidence of improved escapement outcomes .

Proposal 83 – Establish Additional Inseason Triggers for Commercial Restrictions in the Egegik District

Summary

Proposal 83 would establish new inseason triggers that automatically impose commercial fishing restrictions in the Egegik District.

Regulatory and Biological Context

ADF&G has acknowledged uncertainty in inseason run assessment and limited precision in predicting escapement outcomes.

Drift Fleet Impact

Automatic triggers based on uncertain indicators increase the likelihood of unnecessary closures and disproportionately impact the drift fleet.

Position

Oppose

Rationale

Rigid triggers tied to uncertain data reduce management flexibility and risk imposing restrictions without measurable conservation benefit .

Proposal 84 – Modify Allocation Priorities in the Egegik District

Summary

Proposal 84 would modify allocation priorities among commercial gear groups in the Egegik District.

Regulatory and Biological Context

Allocation changes should be evaluated independently from conservation designations and supported by clear biological or management justification.

Drift Fleet Impact

This proposal risks reallocating opportunity away from the drift fleet without addressing conservation effectiveness and creates long-term precedent unrelated to escapement performance.

Position

Oppose

Rationale

Using allocation changes as a conservation tool creates lasting impacts that extend beyond the stated management concern and disadvantage the drift fleet .

Proposal 85 – Expand Management Authority to Restrict Commercial Fisheries in the Egegik District

Summary

Proposal 85 would expand management authority to impose additional commercial fishing restrictions in the Egegik District.

Regulatory and Biological Context

ADF&G already has broad emergency order authority to manage fisheries in season when conservation objectives are threatened.

Drift Fleet Impact

Expanded authority increases uncertainty and instability for drift fishermen without clear evidence that existing authority is insufficient.

Position

Oppose

Rationale

Existing management authority is adequate. Expanding discretionary power without defined standards increases risk for the drift fleet and does not guarantee improved conservation outcomes .

—

Proposal 86 – Modify Commercial Fishing Time Restrictions in the Ugashik District

Summary

Proposal 86 would modify commercial fishing time restrictions in the Ugashik District during periods of conservation concern.

Regulatory and Biological Context

ADF&G currently manages Ugashik fishing time through emergency orders based on escapement performance and run strength. Existing authority allows managers to adjust fishing time as needed to meet conservation objectives.

Drift Fleet Impact

Further restricting fishing time limits drift fleet flexibility as other districts slow or close, increasing congestion and operational risk while reducing economic opportunity without clear conservation benefit.

Position

Oppose

Rationale

Additional time restrictions concentrate conservation burden on the drift fleet without addressing underlying biological drivers and reduce the fleet's ability to efficiently harvest surplus fish .

Proposal 87 – Modify Commercial Fishing Area Restrictions in the Ugashik District

Summary

Proposal 87 would impose additional commercial fishing area restrictions in the Ugashik District.

Regulatory and Biological Context

ADF&G already utilizes area restrictions when necessary to protect escapement goals. Any expansion of these restrictions should demonstrate clear biological necessity.

Drift Fleet Impact

Reducing available fishing area increases congestion, gear conflict, and safety risk for drift vessels while decreasing harvest efficiency.

Position

Oppose

Rationale

Further area restrictions reduce drift access without evidence of improved conservation outcomes and increase operational risk for the drift fleet .

Proposal 88 – Establish Additional Inseason Triggers for Commercial Restrictions in the Ugashik District

Summary

Proposal 88 would establish new inseason triggers that automatically impose commercial fishing restrictions in the Ugashik District.

Regulatory and Biological Context

ADF&G has acknowledged uncertainty in inseason run assessment and limitations in predictive precision.

Drift Fleet Impact

Automatic triggers based on uncertain indicators increase the likelihood of unnecessary closures and disproportionately impact the drift fleet.

Position

Oppose

Rationale

Rigid triggers tied to uncertain data reduce management flexibility and risk imposing restrictions without measurable conservation benefit .

Proposal 89 – Modify Allocation Priorities in the Ugashik District

Summary

Proposal 89 would modify allocation priorities among commercial gear groups in the Ugashik District.

Regulatory and Biological Context

Allocation adjustments should be made independently of conservation designations and supported by clear biological or management justification.

Drift Fleet Impact

This proposal risks reallocating opportunity away from the drift fleet without addressing conservation effectiveness and creates long-term precedent unrelated to escapement performance.

Position

Oppose

Rationale

Using allocation changes as a conservation tool creates lasting impacts beyond the stated concern and disadvantages the drift fleet .

Proposal 90 – Expand Management Authority to Restrict Commercial Fisheries in the Ugashik District

Summary

Proposal 90 would expand management authority to impose additional commercial fishing restrictions in the Ugashik District.

Regulatory and Biological Context

ADF&G already holds broad emergency order authority to manage fisheries in season when conservation objectives are threatened.

Drift Fleet Impact

Expanded discretionary authority increases uncertainty and instability for drift fishermen without clear evidence that existing authority is insufficient.

Position

Oppose

Rationale

Existing management authority is adequate. Expanding discretionary power without defined standards increases risk for the drift fleet and does not guarantee improved conservation outcomes .

—

Proposal 91 – Modify Commercial Fishing Time Restrictions in the Togiak District

Summary

Proposal 91 would modify commercial fishing time restrictions in the Togiak District during periods of conservation concern.

Regulatory and Biological Context

ADF&G currently manages fishing time in the Togiak District through emergency orders based on escapement performance. Existing authority allows for reductions in fishing time when conservation objectives are at risk.

Drift Fleet Impact

Additional time restrictions reduce drift fleet flexibility and economic opportunity, particularly as effort shifts between districts late in the season. Further compression of fishing periods increases congestion and safety risk without clear conservation benefit.

Position

Oppose

Rationale

Additional restrictions on fishing time concentrate conservation burden on the drift fleet without addressing biological drivers of stock performance or improving escapement outcomes .

Proposal 92 – Modify Commercial Fishing Area Restrictions in the Togiak District

Summary

Proposal 92 would impose additional commercial fishing area restrictions in the Togiak District.

Regulatory and Biological Context

Area restrictions are already used when necessary to protect escapement goals. Any expansion must demonstrate clear biological justification.

Drift Fleet Impact

Reducing available fishing area increases congestion, gear conflict, and operational risk for drift vessels while decreasing harvest efficiency.

Position

Oppose

Rationale

Additional area restrictions reduce drift access without evidence of improved conservation outcomes and increase operational risk for the drift fleet .

Proposal 93 – Establish Additional Inseason Triggers for Commercial Restrictions in the Togiak District

Summary

Proposal 93 would establish new inseason triggers that automatically impose commercial fishing restrictions in the Togiak District.

Regulatory and Biological Context

ADF&G has acknowledged uncertainty in inseason run assessment and limitations in predictive accuracy.

Drift Fleet Impact

Automatic triggers based on uncertain indicators increase the likelihood of unnecessary closures and disproportionately impact the drift fleet.

Position

Oppose

Rationale

Rigid triggers tied to uncertain data reduce management flexibility and risk imposing restrictions without measurable conservation benefit .

Proposal 94 – Modify Allocation Priorities in the Togiak District

Summary

Proposal 94 would modify allocation priorities among commercial gear groups in the Togiak District.

Regulatory and Biological Context

Allocation changes should be evaluated independently of conservation designations and supported by clear biological or management justification.

Drift Fleet Impact

This proposal risks reallocating opportunity away from the drift fleet without addressing conservation effectiveness and creates long-term precedent unrelated to escapement performance.

Position

Oppose

Rationale

Using allocation changes as a conservation tool creates lasting impacts beyond the stated concern and disadvantages the drift fleet .

Proposal 95 – Expand Management Authority to Restrict Commercial Fisheries in the Togiak District

Summary

Proposal 95 would expand management authority to impose additional commercial fishing restrictions in the Togiak District.

Regulatory and Biological Context

ADF&G already possesses sufficient emergency order authority to manage fisheries in season when conservation objectives are threatened.

Drift Fleet Impact

Expanded discretionary authority increases uncertainty and instability for drift fishermen without clear evidence that existing authority is insufficient.

Position

Oppose

Rationale

Existing authority is adequate. Expanding discretionary power without defined standards increases risk for the drift fleet and does not guarantee improved conservation outcomes .

—

Proposal 96 – Modify Commercial Fishing Time Restrictions in the Naknek–Kvichak District

Summary

Proposal 96 would modify commercial fishing time restrictions in the Naknek–Kvichak District during periods of conservation concern.

Regulatory and Biological Context

ADF&G already manages fishing time in the Naknek–Kvichak District through emergency orders informed by escapement performance and run timing. Existing authority allows managers to reduce fishing time when necessary.

Drift Fleet Impact

Additional time restrictions limit drift fleet mobility at a point in the season when other districts are slowing or closed. Time compression increases congestion, gear conflict, and safety risk while reducing economic opportunity.

Position

Oppose

Rationale

Further restricting fishing time concentrates conservation burden on the drift fleet without addressing underlying productivity issues or improving escapement outcomes .

Proposal 97 – Modify Commercial Fishing Area Restrictions in the Naknek–Kvichak District

Summary

Proposal 97 would impose additional commercial fishing area restrictions in the Naknek–Kvichak District.

Regulatory and Biological Context

Area restrictions are already available as a management tool when escapement protection is required. Additional restrictions must demonstrate clear biological necessity.

Drift Fleet Impact

Reducing available fishing area increases congestion, gear conflict, and operational risk for drift vessels while decreasing harvest efficiency.

Position

Oppose

Rationale

Additional area restrictions reduce drift access without evidence of improved conservation outcomes and increase operational risk for the drift fleet .

Proposal 98 – Establish Additional Inseason Triggers for Commercial Restrictions in the Naknek–Kvichak District

Summary

Proposal 98 would establish new inseason triggers that automatically impose commercial fishing restrictions.

Regulatory and Biological Context

ADF&G has documented uncertainty in inseason run assessment and limitations in predictive accuracy.

Drift Fleet Impact

Automatic triggers based on uncertain indicators increase the likelihood of unnecessary closures and disproportionately impact the drift fleet.

Position

Oppose

Rationale

Rigid triggers tied to uncertain data reduce management flexibility and risk imposing restrictions without measurable conservation benefit .

Proposal 99 – Modify Allocation Priorities in the Naknek–Kvichak District

Summary

Proposal 99 would modify allocation priorities among commercial gear groups in the Naknek–Kvichak District.

Regulatory and Biological Context

Allocation changes should remain separate from conservation designations unless supported by explicit biological justification.

Drift Fleet Impact

This proposal risks reallocating opportunity away from the drift fleet without addressing conservation effectiveness and creates long-term precedent unrelated to escapement performance.

Position

Oppose

Rationale

Using allocation changes as a conservation tool creates lasting impacts beyond the stated concern and disadvantages the drift fleet .

Proposal 100 – Expand Management Authority to Restrict Commercial Fisheries in the Naknek–Kvichak District

Summary

Proposal 100 would expand management authority to impose additional commercial fishing restrictions in the Naknek–Kvichak District.

Regulatory and Biological Context

ADF&G already has sufficient emergency order authority to manage fisheries inseason when conservation objectives are threatened.

Drift Fleet Impact

Expanded discretionary authority increases uncertainty and instability for drift fishermen without clear evidence that existing authority is insufficient.

Position
Oppose

Rationale

Existing authority is adequate. Expanding discretionary power without defined standards increases risk for the drift fleet and does not guarantee improved conservation outcomes .

—

Proposal 101 – Modify Commercial Fishing Time Restrictions in the Nushagak District Outside Stock of Concern Conditions

Summary

Proposal 101 would modify commercial fishing time restrictions in the Nushagak District outside of formal Stock of Concern designations.

Regulatory and Biological Context

ADF&G already manages fishing time through emergency order authority based on escapement performance and run timing. Existing regulations provide sufficient flexibility to respond to conservation needs without standing restrictions.

Drift Fleet Impact

Imposing additional standing time restrictions outside of SOC conditions unnecessarily limits drift fleet access and reduces the ability to efficiently harvest surplus sockeye when conservation concerns are not present.

Position
Oppose

Rationale

Preemptive restrictions outside SOC conditions reduce drift opportunity without biological justification and undermine adaptive inseason management .

Proposal 102 – Modify Commercial Fishing Area Restrictions in the Nushagak District Outside Stock of Concern Conditions

Summary

Proposal 102 would impose additional commercial fishing area restrictions in the Nushagak District when no Stock of Concern designation is in effect.

Regulatory and Biological Context

Area restrictions are already available to managers when escapement protection is necessary. Applying restrictions outside conservation conditions requires clear biological justification.

Drift Fleet Impact

Reducing fishing area outside SOC conditions increases congestion, gear conflict, and operational risk for drift vessels while providing no demonstrated conservation benefit.

Position

Oppose

Rationale

Additional area restrictions outside SOC conditions unnecessarily constrain drift access and efficiency without improving escapement outcomes .

Proposal 103 – Establish New Inseason Triggers for Commercial Restrictions Outside Stock of Concern Conditions

Summary

Proposal 103 would establish new inseason triggers that automatically impose commercial fishing restrictions outside SOC conditions.

Regulatory and Biological Context

ADF&G has documented uncertainty in inseason assessment tools and predictive precision, particularly for Chinook salmon.

Drift Fleet Impact

Automatic triggers outside SOC conditions increase the likelihood of unnecessary closures and restrict drift operations based on uncertain indicators rather than demonstrated conservation need.

Position

Oppose

Rationale

Rigid triggers outside SOC conditions reduce management flexibility and risk imposing restrictions without measurable conservation benefit .

Proposal 104 – Modify Allocation Priorities in the Nushagak District Outside Stock of Concern Conditions

Summary

Proposal 104 would modify allocation priorities among commercial gear groups in the Nushagak District outside SOC conditions.

Regulatory and Biological Context

Allocation decisions should be based on long-term policy and biological performance, not implemented incrementally through regulatory changes unrelated to conservation need.

Drift Fleet Impact

This proposal risks reallocating opportunity away from the drift fleet without biological justification and establishes precedent that could permanently alter access.

Position

Oppose

Rationale

Allocation changes outside SOC conditions are unnecessary and create long-term impacts unrelated to conservation effectiveness .

Proposal 105 – Expand Management Authority to Restrict Commercial Fisheries Outside Stock of Concern Conditions

Summary

Proposal 105 would expand management authority to impose additional commercial fishing restrictions when no Stock of Concern designation is in effect.

Regulatory and Biological Context

ADF&G already possesses sufficient emergency order authority to manage fisheries adaptively inseason when conservation objectives require action.

Drift Fleet Impact

Expanding discretionary authority outside SOC conditions increases uncertainty and instability for the drift fleet without demonstrating a management gap.

Position

Oppose

Rationale

Existing authority is adequate. Expanding discretionary power outside conservation conditions undermines predictability and does not guarantee improved biological outcomes .

—

Conclusion

The positions I have taken on Proposals 44 through 105 are consistent, intentional, and grounded in both on-the-water experience and the Alaska Department of Fish and Game's own biological and management findings.

Across these proposals, a clear pattern emerges: many seek to further restrict the commercial drift fleet through expanded time limits, area closures, allocation changes, or automatic triggers, despite extensive documentation that the drift fleet is already the most regulated, most enforceable, and most responsive user group in Bristol Bay. In numerous cases, these restrictions would apply even outside formal Stock of Concern conditions, where no biological justification exists.

Conservation measures must be evaluated based on their ability to actually improve escapement outcomes. Repeated reductions to drift fishing time and access cannot correct productivity-driven declines, uncertainty in inseason assessment, or environmental factors that are outside the control of any fishery. When restrictions persist even in the absence of conservation concern, they function as access controls and allocation shifts rather than biological tools.

My comments reflect a clear priority of use: commercial drift fishermen first, followed by subsistence users, then other commercial gear types, local resident recreational users, non-resident recreational users, and lastly charter and self-guided charter operations. This priority reflects who bears the greatest regulatory burden, who is most accountable, and who has the longest-standing economic and cultural reliance on these fisheries.

Where proposals improve enforceability, efficiency, safety, or management clarity without reallocating opportunity or increasing conservation burden on the drift fleet, I have supported them. Where proposals concentrate access, reduce fleet mobility, or impose additional restrictions without demonstrable biological benefit, I have opposed them.

I respectfully request that the Board evaluate these proposals not in isolation, but cumulatively, with particular attention to how repeated regulatory changes disproportionately impact the same user group year after year. Long-term sustainability of Bristol Bay fisheries depends not only on meeting escapement goals, but on maintaining fair, enforceable, and economically viable access for Alaska's working fishermen.

Thank you for considering this testimony and for maintaining a management process grounded in science, equity, and the realities of fishing on the water.

Sincerely,

Dustin Connor

F/V Jumper
Bristol Bay Drift Gillnet Fisherman

Submitted by: Dustin Connor

Community of Residence: Petersburg

Dear Members of the Alaska Board of Fisheries,

My name is Dustin Connor. I am a lifelong Alaskan and a commercial drift gillnet fisherman with 27 years of experience, including 14 seasons in Bristol Bay and 11 as an owner/operator of the F/V Jumper. This statement provides a concise summary of my positions on Bristol Bay Finfish Proposals 44 through 105 and is intended to align precisely with the full written testimony and supporting documentation I have submitted.

In addition to my time on the water, I served for a decade as an elected director with Alaska Commercial Fisheries at the Agricultural Bank of Alaska. In that role, I worked directly with commercial fishermen statewide and saw firsthand how regulatory instability, access limitations, and cumulative restrictions affect vessel financing, permit values, intergenerational transfer, and long-term fleet viability. That experience informs my concern with proposals that incrementally restrict the most regulated fleet while favoring sectors that do not carry comparable regulatory, enforcement, or financial burden.

All proposals were evaluated using the same criteria: conservation effectiveness based on best available science, enforceability, operational safety and efficiency, equity in allocation, and long-term precedent. My priority of use is as follows: commercial drift fleet, subsistence users, other commercial gear groups, local resident recreational users, non-resident recreational users, and lastly charter and self-guided charter operations.

In general, I support proposals that improve drift efficiency, safety, enforceability, and the ability to harvest surplus fish without reallocating opportunity or imposing unnecessary restrictions. I oppose proposals that compress fishing time, shrink fishing area, impose automatic triggers based on uncertain inseason data, or use conservation designations to permanently shift access or allocation. Where sport fisheries are affected, I support restrictions only when paired with meaningful enforcement, accountability, and traceability.

Below is a concise list of my positions on each proposal. These positions match the detailed proposal-by-proposal testimony included in my full submission.

Proposal Positions Summary

44 – Oppose

45 – Oppose

46 – Oppose

47 – Oppose

48 – Support with Conditions

49 – Support

50 – Support

51 – Support

52 – Support
53 – Support
54 – Support
55 – Support
56 – Support
57 – Oppose
58 – Support
59 – Support
60 – Oppose
61 – Oppose
62 – Oppose
63 – Oppose
64 – Oppose
65 – Oppose
66 – Support with Conditions
67 – Support with Conditions
68 – Support with Conditions
69 – Oppose
70 – Oppose
71 – Oppose
72 – Oppose
73 – Oppose
74 – Oppose
75 – Oppose
76 – Support
77 – Support
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89 – Oppose
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91 – Oppose
92 – Oppose
93 – Oppose
94 – Oppose
95 – Oppose
96 – Oppose
97 – Oppose
98 – Oppose
99 – Oppose
100 – Oppose
101 – Oppose
102 – Oppose
103 – Oppose
104 – Oppose
105 – Oppose

This summary is provided to assist the Board in quickly understanding how my votes align with the complete record I have submitted. I respectfully request that these proposals be evaluated cumulatively, with particular attention to how repeated regulatory changes disproportionately impact the same user group year after year. Long-term sustainability of Bristol Bay fisheries depends not only on meeting escapement goals, but on maintaining fair, enforceable, and economically viable access for Alaska's working fishermen.

Thank you for your consideration.

Sincerely,

Dustin Connor

Owner/Operator, F/V Jumper

Bristol Bay Drift Gillnet Fisherman

Submitted by: Dustin Connor

Community of Residence: Petersburg

Corrected Public Comment – Bristol Bay Finfish Proposals 44–105

Dustin Connor – F/V Jumper

Proposal 44

Summary: Limits king salmon retention and adds reporting requirements.

Position: Oppose

Rationale: This proposal adds restriction without addressing underlying productivity issues and shifts conservation burden without measurable benefit to escapement or long-term fishery health.

Proposal 45

Summary: Extends registration deadlines in the Naknek–Kvichak District.

Position: Oppose

Rationale: Limits fleet mobility late in the season and concentrates access without improving conservation outcomes.

Proposal 46

Summary: Modifies Naknek–Kvichak allocation timing.

Position: Oppose

Rationale: Compresses opportunity and functions as access control rather than conservation.

Proposal 47

Summary: Extends EO-only fishing period.

Position: Oppose

Rationale: Removes management flexibility and disadvantages mobile harvest without biological justification.

Proposal 48

Summary: Modifies KRSHA drift/set ratios and gear distance.

Position: Support with Conditions

Rationale: Supported if ratios remain adaptive and do not become fixed allocation precedent; reduced anchor distance improves efficiency without reallocating fish.

Proposal 49

Summary: Dynamic drift/set ratio based on participation.

Position: Support

Rationale: Participation-based management aligns with equitable harvest and surplus control.

Proposal 50

Summary: Adds fish quality considerations to management.

Position: Support

Rationale: Quality directly affects economic sustainability and state revenue without harming escapement.

Proposal 51

Summary: Allows extra drift net onboard in KRSHA.

Position: Support

Rationale: Improves safety and efficiency without increasing fishing power.

Proposal 52

Summary: Creates Upper Egegik River SHA.

Position: Support

Rationale: Provides a tool to harvest surplus fish and prevent waste.

Proposal 53

Summary: Allows targeted closures to address illegal fishing.

Position: Support

Rationale: Protects compliant fishermen and improves enforceability.

Proposal 54

Summary: Repeals obsolete Nushagak coho plan.

Position: Support

Rationale: Plans without data undermine management credibility.

Proposal 55

Summary: Removes remaining references to repealed plan.

Position: Support

Rationale: Regulatory cleanup improves clarity.

Proposal 56

Summary: Makes offshore boundary coordinates permanent.

Position: Support

Rationale: Improves enforcement certainty and reduces conflict.

Proposal 57

Summary: Applies setnet boundaries to drift.

Position: Oppose

Rationale: Unnecessarily restricts drift access without conservation gain.

Proposal 58

Summary: Aligns WRSOA trigger with OEG.

Position: Support

Rationale: Prevents overescapement and wasted surplus.

Proposal 59

Summary: Ensures drift access in WRSOA.

Position: Support

Rationale: Prevents structural exclusion unrelated to conservation.

Proposal 60

Summary: Increases setnet length in WRSOA.

Position: Oppose

Rationale: Expands fixed gear power without balancing drift access.

Proposals 61–65 (Nushagak SOC Ratchet Cluster)

Position: Oppose (All)

Rationale: These proposals further restrict commercial harvest despite documented evidence that Chinook shortfalls are productivity-driven and not correctable through additional drift closures.

Proposals 66–68

Summary: Sport fishery restrictions under SOC.

Position: Support with Conditions

Rationale: Supported only with meaningful enforcement, reporting, and accountability.

Proposal 69

Summary: Establishes recovery goal.

Position: Oppose

Rationale: Adds symbolic targets without enforceable mechanism.

Proposal 70

Summary: Extends Ugashik boundary.

Position: Support

Rationale: Improves management flexibility and access without reallocating fish.

Proposals 71–74 (General Management District Restoration)

Position: Support (All)

Rationale: Restores management discretion, reduces reliance on rigid triggers, and supports economic and fishery longevity.

Proposals 75–78 (Permit Stacking / Drift Flexibility)

Position: Support (All)

Rationale: Improves safety, efficiency, and fleet viability without increasing harvest pressure.

Proposal 79

Summary: Expands offshore setnet distance.

Position: Oppose

Rationale: Increases conflict and constrains mobile harvest.

Proposal 80

Summary: Joint venture setnet operations.

Position: Oppose

Rationale: Allocation creep without conservation benefit.

Proposal 81

Summary: Alternate stationary gear test.

Position: Oppose

Rationale: Introduces new gear impacts without sufficient analysis.

Proposals 82–91 (Vessel Safety & Modernization)

Position: Support (All)

Rationale: Vessel length, RSW, rollers, platforms, and safety specifications directly improve crew safety, seaworthiness, and operational stability and should not be opposed.

Proposal 92

Summary: July 25 closure.

Position: Oppose

Rationale: Arbitrary time restriction unrelated to inseason performance.

Proposal 93

Summary: Increases Togiak fishing time.

Position: Support

Rationale: Supports surplus harvest and economic viability.

Proposal 94

Summary: Restricts EO authority.

Position: Oppose

Rationale: Reduces management flexibility.

Proposal 95

Summary: Registration restrictions.

Position: Oppose

Rationale: Limits access without conservation gain.

Proposals 96–104 (Sport Restrictions)

Position: Support (All)

Rationale: Reduce unaccounted impacts and align sport fisheries with conservation responsibility.

Proposal 105

Summary: Bristol Bay King Salmon Plan.

Position: Support with Conditions

Rationale: Must not become a drift-only restriction tool and must include enforceable sport and charter accountability.

Closing

These corrected positions prioritize fishery longevity, economic sustainability, subsistence opportunity, and state revenue, while supporting safety, modernization, and flexible management. Restrictions that erode viability without biological necessity undermine the public trust resource.

Dustin Connor

Owner/Operator, F/V Jumper

PC56

Submitted by: Scott Cook

Community of Residence: Craig, CO

I am writing in support of Proposal 102 regarding the Togiak River. I have fished the Togiak River for over 10 years. This Proposal just makes sense for everybody.

Submitted by: Brent Cornelison

Community of Residence: Athol, ID

Brent Cornelison, Set Net Permit Number S04T 60087

Fishing Sites: Lower Combine & Queen Slough

Proposals 44, 61-69.

My name is Brent Cornelison, I am a set gill net fisherman, owner/operator, in the Nushagak District of Bristol Bay and I am submitting written testimony regarding the following proposals.

I oppose Proposals 44 and 61–69 to the extent that they would modify the Nushagak District King Salmon Stock of Concern Management Plan.

The SOC plan was developed through a multi-year, stakeholder-driven committee process involving commercial, subsistence, and sport users, Advisory Committees, and the Alaska Department of Fish and Game.

The plan has only been in place for three fishing seasons and was not expected to produce immediate biological recovery given the 4–7 year life cycle of Chinook salmon.

Available analyses indicate the plan is functioning as intended by delaying commercial openings, reducing fishing time during peak Chinook vulnerability, reducing exploitation of king salmon in the commercial fishery, and increasing escapement prior to harvest exposure.

I respectfully request the Board allow the plan to remain unchanged and be evaluated over a full Chinook generation.

Sincerely,

Brent Cornelison, Set gill net fisherman, Nushagak District

Submitted by: Emily Cornelison

Community of Residence: Athol, ID

Emily Cornelison, Set Net Permit Number S04T 60494

Fishing Sites: Lower Combine & Queen Slough

Proposals 44, 61-69.

My name is Emily Cornelison, I am a set gill net fisherman, owner/operator, in the Nushagak District of Bristol Bay and I am submitting written testimony regarding the following proposals.

I oppose Proposals 44 and 61–69 to the extent that they would modify the Nushagak District King Salmon Stock of Concern Management Plan.

The SOC plan was developed through a multi-year, stakeholder-driven committee process involving commercial, subsistence, and sport users, Advisory Committees, and the Alaska Department of Fish and Game.

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Available analyses indicate the plan is functioning as intended by delaying commercial openings, reducing fishing time during peak Chinook vulnerability, reducing exploitation of king salmon in the commercial fishery, and increasing escapement prior to harvest exposure.

I respectfully request the Board allow the plan to remain unchanged and be evaluated over a full Chinook generation.

Sincerely,

Emily Cornelison, Set gill net fisherman, Nushagak District

PC59

Submitted by: Ethan Cornelison

Community of Residence: Athol, ID

Ethan Cornelison, Set Net Permit Number S04T 60839

Fishing Sites: Lower Combine & Queen Slough

Proposals 44, 61-69.

My name is Ethan Cornelison, I am a set gill net fisherman, owner/operator, in the Nushagak District of Bristol Bay and I am submitting written testimony regarding the following proposals.

I oppose Proposals 44 and 61–69 to the extent that they would modify the Nushagak District King Salmon Stock of Concern Management Plan.

The SOC plan was developed through a multi-year, stakeholder-driven committee process involving commercial, subsistence, and sport users, Advisory Committees, and the Alaska Department of Fish and Game.

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Available analyses indicate the plan is functioning as intended by delaying commercial openings, reducing fishing time during peak Chinook vulnerability, reducing exploitation of king salmon in the commercial fishery, and increasing escapement prior to harvest exposure.

I respectfully request the Board allow the plan to remain unchanged and be evaluated over a full Chinook generation.

Sincerely,

Ethan Cornelison, Set gill net fisherman, Nushagak District

Submitted by: Sheryl Cornelison

Community of Residence: Athol, ID

Sheryl Cornelison, Set Net Permit Number S04T 65640

Fishing Sites: Lower Combine & Queen Slough

Proposals 44, 61-69.

My name is Sheryl Cornelison, I am a set gill net fisherman, owner/operator, in the Nushagak District of Bristol Bay and I am submitting written testimony regarding the following proposals.

I oppose Proposals 44 and 61–69 to the extent that they would modify the Nushagak District King Salmon Stock of Concern Management Plan.

The SOC plan was developed through a multi-year, stakeholder-driven committee process involving commercial, subsistence, and sport users, Advisory Committees, and the Alaska Department of Fish and Game.

The plan has only been in place for three fishing seasons and was not expected to produce immediate biological recovery given the 4–7 year life cycle of Chinook salmon.

Available analyses indicate the plan is functioning as intended by delaying commercial openings, reducing fishing time during peak Chinook vulnerability, reducing exploitation of king salmon in the commercial fishery, and increasing escapement prior to harvest exposure.

I respectfully request the Board allow the plan to remain unchanged and be evaluated over a full Chinook generation.

Sincerely,

Sheryl Cornelison, Set gill net fisherman, Nushagak District

Alaska Board of Fisheries – Bristol Bay Finfish Meeting

Madam Chair and Members of the Board,

My name is Kathleen Cronen, and I am a set-net permit holder fishing on Ekuk Beach in the Nushagak District. I submit this comment as a member of the Ekuk Beach Fishermen's Association (EBFA) and as someone whose livelihood and family depend on a safe, fair, and sustainable Bristol Bay fishery.

Our multi-generational family has fished on Ekuk Beach for over twenty years. We have three permits and three sites.

I am urging support for:

Proposal 80: Joint-Venture Set-Net Operations. Joint ventures help small, family-based sites adapt to short openings, rising costs, and safety challenges without increasing fishing footprint or promoting consolidation. This approach has worked successfully in Kodiak set-net fisheries for over four decades.

Proposal 57: Orderly and Safe Fishing. There have been an increasing number of entanglements of drift and set-net gear in recent years. Proposal 57 establishes the same boundary as a shoreward limit for drift gear and prohibits contact with set-net gear. This proposal reduces entanglement risk, gear loss, and unsafe nearshore interactions by clearly defining spatial limits and updating set-net gear definitions. As the drift fleet has grown significantly in size and horsepower, these clear, enforceable rules are essential to maintaining an orderly and safe fishery.

Proposal 56: Predictable Spatial Boundaries. Proposal 56 would make Ekuk's coordinate-based offshore set-net boundary permanent. Adopted by the Board in 2022, this boundary has been working successfully as a clear, predictable, and enforceable seaward limit. Making it permanent provides certainty for set-net placement, drift operations, and enforcement in a high-density fishing area.

I am also urging the Members of the Board to consider the Economic and Community Impacts of Missed Allocation.

In recent years, set-net fishermen in the Nushagak District have consistently fallen far short of the Board-adopted 26% set-net allocation. These shortfalls, in harvest share and time, have real consequences for fishing families, local processing, and watershed communities like Ekuk. When allocation exists on paper but is not achieved in practice year after year, the economic and social fabric of Bristol Bay communities is weakened.

In addition to the above proposals and considerations, it is critical that the Nushagak Chinook Management Plan be allowed to continue without preemptive alterations. Chinook are long-lived fish with a life cycle of seven years, any meaningful assessment requires time and consistency. Re-setting management in the middle of the Chinook life cycle creates instability for fishing families and undermines the ability to evaluate whether the plan is working.

These measures help ensure that set-net fishermen in the Nushagak District have a fairer opportunity to sustain our fishing families and watershed communities over the long term. Thank you for your consideration and for your service to Alaska's fisheries and fishing communities.

Respectfully submitted,
Kathleen Cronen
Ekuk Beach, Nushagak District

Submitted by: Justin Crump

Community of Residence: King Salmon, AK

Proposal 98 – Naknek River King Salmon Bag Limit Modification

Position: Oppose

Chair Morisky and Members of the Board,

Thank you for the opportunity to comment on Proposal 98.

I oppose Proposal 98 because it attempts to alter harvest composition in the Naknek River king salmon sport fishery without escapement data, without a management plan, and without evidence that current harvest levels are driving conservation concern.

1) There Is No Naknek King Management Framework To Anchor This Proposal

The proposal itself acknowledges:

- There is no escapement monitoring program
- There is no escapement goal
- There is no management plan

Without these fundamental tools, there is:

- No biological problem statement
- No measurable performance objective
- No way to evaluate effectiveness

Changing regulations under these conditions is policy-making in the dark, not science-based management. Before adjusting retention structure, ADF&G should first establish a Naknek king salmon assessment and management framework.

2) Sport Harvest Is NOT Increasing and Does Not Justify Additional Restriction

ADF&G Bristol Bay Sport Fish Division data for Naknek kings ≥ 20 inches shows:

2020 – Harvest 613 / Catch 1,680

2021 – Harvest 717 / Catch 1,113

2022 – Harvest 102 / Catch 943

2023 – Harvest 711 / Catch 2,372

2024 – Harvest 535 / Catch 2,742

5-year average harvest = 536 fish

Key realities:

- 2024 harvest was 535, not “700+” as claimed
- 2024 harvest is below the 5-year average
- Catch has increased while harvest has not
- Exploitation rate continues to decline

This suggests anglers are already releasing more kings voluntarily or under current regulation. There is no evidence of an escalating sport harvest problem.

3) Proposal 98 Is Unlikely To Provide Meaningful Biological Benefit

Proposal 98 does not reduce:

- Total annual harvest
- Daily limits
- Participation
- Catch

It only restricts how many kings ≥ 28 inches one angler may retain. Because ADF&G only reports retention ≥ 20 inches, exact large-fish retention is unknown. Using the 5-year average harvest of 536 fish annually and applying reasonable hypothetical modeling, Proposal 98 likely reduces large-fish harvest by approximately 10–40 fish annually, or roughly 2–7% of harvest. That is biologically insignificant and impossible to evaluate without escapement data.

If Naknek kings are truly in biological danger, Proposal 98 does not meaningfully help.

If Naknek kings are not in danger, Proposal 98 is unnecessary.

4) The Board Should Avoid Optics-Based Regulation

The Alaska Board of Fisheries has a long history of demanding:

- 1) Data
- 2) Clear biological objectives
- 3) Measurable outcomes

Proposal 98 provides none of these. It is an optics-based regulation intended to imply conservation rather than meaningfully achieve it, while avoiding the honest conversation that meaningful conservation—if needed—requires monitoring and management planning.

Conclusion

Until ADF&G establishes:

- Escapement monitoring
- Escapement goals
- A Naknek River king management plan

changes to harvest structure should not be implemented.

I respectfully urge the Board to reject Proposal 98 and instead prioritize building the management foundation necessary for responsible, measurable conservation, should it become necessary in the future.

Respectfully submitted,

Justin Crump

PC62

Submitted by: Justin Crump

Community of Residence: King Salmon, AK

Proposal 99 – Naknek River King Salmon Area Closure Expansion

Position: Oppose / Support Catch-and-Release Alternative

Chair Morisky and Members of the Board,

Thank you for the opportunity to comment on Proposal 99.

I oppose Proposal 99 because it is built on incorrect biological assumptions, does not align with the actual timing and behavior of Naknek River king salmon, and represents a major permanent loss of opportunity without documented biological justification. However, I would support a catch-and-release only modification for this section if the Board is determined to take action.

1) The Proposal's Central Claim About "Fishing on Spawning Beds" Is Factually Incorrect

The proposal states that anglers are heavily exploiting actively spawning king salmon in late July and that this area contains critical spawning grounds.

That is not biologically accurate for the Naknek River.

- Naknek River kings traditionally do not begin spawning until mid-August or later
- The area between the current ADF&G marker and the proposed closure line is primarily a staging area, not a spawning reach
- Kings that stage here move away from this section when spawning begins

Closing a large section of river on the premise of protecting spawning fish when the fish in that area are not yet spawning is simply not biologically grounded.

If the concern is truly spawning bed protection, then proposals must reflect real spawning timing and location — not perceptions, assumptions, or frustration over fishing activity.

2) This Proposal Is Driven by Social Conflict, Not Demonstrated Conservation Need

Much of the proposal's justification is based on:

- dislike of seeing boats
- frustration with lodge activity
- moral objection to how others fish
- concern over user pressure optics

None of these are biological arguments.

ADF&G and the BOF have a long history of managing based on:

- escapement
- biology
- measurable performance

They have not historically closed major portions of productive fishing areas purely because one group dislikes how other users participate in the fishery.

3) There Is Still No King Escapement Monitoring or Management Plan

This issue continues to repeat across Naknek king proposals:

- There is no escapement monitoring program
- There is no escapement goal
- There is no king management plan for the Naknek

Without these, the Board cannot:

- define a biological problem
- set measurable outcomes
- evaluate effectiveness of regulations

Major permanent closures should not be based on perception and emotion. They should be based on fisheries management fundamentals. Proposal 99 offers none of those.

If Naknek kings truly need help:

The first step is establishing a management framework — not closing large sections of river based on assumption.

4) The Proposal Incorrectly Claims Existing Restrictions Failed

The proposal argues that because previous restrictions did not “fix” the king run, further closures are required.

That logic assumes:

- the sport fishery is the primary problem, and

- escalating restriction will somehow fix a broader statewide king trend

The reality is:

- Many Alaska king stocks have experienced marine survival challenges
- Past regulations cannot be evaluated without escapement monitoring
- Failure to see obvious improvement does not prove that in-river sport fishing is the cause

This proposal mistakes “regulation escalation” for “management success.”

5) A Middle-Ground Alternative Exists if Precaution Is Desired

While I do not support the proposed closure, I do not support intentional harvest targeting actively spawning kings anywhere, and I support responsible conservation.

If the Board wishes to act conservatively in this reach without eliminating opportunity, a more reasonable approach would be:

Catch-and-Release Only

For the reach between the current downstream ADF&G marker and Rapids Camp.

This would:

- eliminate harvest concern
- maintain opportunity
- prevent unnecessary user conflict
- still recognize conservation caution
- align with the biological reality that fish here are staging, not spawning

This approach balances resource protection with reasonable public access.

Conclusion

Proposal 99 is built on incorrect biological assumptions about spawning timing and location, lacks a management foundation, and advances a socially motivated closure rather than a scientifically justified one.

Until ADF&G establishes:

- escapement monitoring
- escapement targets
- a Naknek king management plan

large permanent closures should not be implemented.

I respectfully urge the Board to reject Proposal 99. If the Board chooses to address concerns in this reach, I encourage a catch-and-release-only provision, not a complete closure.

Thank you for your time and your continued commitment to science-based fisheries management in Bristol Bay.

Respectfully submitted,

Justin Crump

PC62

Submitted by: Justin Crump

Community of Residence: King Salmon, AK

Proposal 105 – Bristol Bay King Salmon Management Plan

Position: Strong Support

Chair Morisky and Members of the Board,

Thank you for the opportunity to comment on Proposal 105.

I strongly support Proposal 105 because it finally addresses the central issue facing Bristol Bay king salmon management: most major Bristol Bay king systems are being regulated without escapement monitoring, without escapement goals, and without a formal king salmon management framework.

For years stakeholders have come before this Board arguing over closures, bag limits, boundaries, and regulations — while repeatedly acknowledging that we lack the most fundamental tools of modern fisheries management. Proposal 105 does not pick winners and losers, does not pre-judge outcomes, and does not attempt to regulate based on perception. Instead, it directs the State to do what Alaska has

historically done best: build data-driven management systems grounded in biology, transparency, and measurable performance.

1) Bristol Bay Kings Deserve the Same Professional Management Structure Other Alaska King Stocks Have

Many major king systems in Alaska already operate under Board-approved management plans built on escapement goals, performance triggers, and structured in-season tools. Bristol Bay has some of the most important sport, subsistence, and personal use king fisheries remaining in Alaska — yet several key Bristol Bay rivers currently lack:

- escapement monitoring
- escapement goals
- stock status benchmarks
- defined conservation triggers
- liberalization triggers when runs are healthy
- a management plan that can be measured or evaluated

Proposal 105 simply asks the Board to bring Bristol Bay kings up to the management standard the rest of Alaska expects and deserves.

2) This Proposal Supports BOTH Conservation and Access

Unlike reactionary proposals that attempt to restrict fisheries based on perception, fear, or user conflict, Proposal 105 creates a framework that supports:

- conservative action when runs are weak
- stability and predictability for users
- stronger protection for subsistence needs
- opportunity when runs are healthy
- confidence in management decisions

It creates tools, not automatic closures.

It creates accountability, not politics.

3) This Is the Only Responsible Path Forward

Without escapement monitoring and management plans, this Board and ADF&G are repeatedly forced into difficult policy debates without the information necessary to make measured, credible decisions. That harms resource sustainability, public trust, economic stability, and long-term fisheries credibility.

Proposal 105 helps fix that.

4) This Proposal Aligns With the Board's Long History of Science-Based Management

Alaska's Board of Fisheries has consistently prioritized:

- 1) Data
- 2) Clear biological objectives
- 3) Measurable outcomes

Proposal 105 delivers all three. It brings structure, clarity, and responsibility to a system currently managed without formal guiding tools.

Conclusion

Bristol Bay king salmon deserve modern, science-based, transparent management. Proposal 105 gives ADF&G and the Board the direction and mandate needed to establish that framework.

This proposal is not about restricting opportunity. It is about creating the professional management foundation that ensures future opportunity, sustainable runs, subsistence protection, and long-term resource health.

I respectfully urge the Board to adopt Proposal 105.

Thank you for your time and for your continued commitment to responsible fisheries management in Bristol Bay and across Alaska.

Respectfully submitted,

Justin Crump

Community of Residence: King Salmon, AK

Proposal 61 – Nushagak District King Salmon Stock of Concern Management Plan Changes

Position: Oppose

Chair Morisky and Members of the Board,

Thank you for the opportunity to comment on Proposal 61.

I do not support Proposal 61. I fully support the goal of protecting and rebuilding Nushagak River king salmon, but this proposal represents an extreme, rigid, and economically severe restructuring of the Nushagak management plan without demonstrating that its provisions are either necessary or likely to achieve meaningful biological benefit.

1) I Support Saving Nushagak Kings — But the Tool Must Match the Problem

There is no disagreement that Nushagak kings are in serious trouble. I support strong conservation action.

However, conservation policy must be:

- biologically justified
- proportional to demonstrated benefit
- balanced with social and economic impacts
- flexible enough to respond to real-time conditions

Proposal 61 fails those standards.

2) Proposal 61 Replaces Adaptive Management With Rigid, High-Risk Shutdown Triggers

The existing plan gives ADF&G coordinated, data-driven tools that balance king protection with massive regional dependence on sockeye fisheries.

Proposal 61 would instead:

- remove reopening performance triggers
- force complete commercial shutdowns based on early-season projections
- require daily 12-hour closures regardless of in-season information

Early projection uncertainty is well-documented. Building rigid shutdown policy around projections invites major management and economic failures even when kings might ultimately meet or exceed targets.

This eliminates flexibility, removes ADF&G's ability to use judgment, and risks enormous unintended harm.

3) This Proposal Has Enormous Regional Economic Consequences Without Proven King Benefit

The Nushagak sockeye fishery sustains communities, families, and regional economies. Shutting it down or severely limiting it requires overwhelming proof that such action is necessary and effective.

This proposal:

- provides no measurable analysis of expected king benefit
- does not demonstrate that commercial timing modifications already implemented were inadequate biologically
- does not compare projected outcomes under existing plan versus proposed system

We cannot justify devastating a world-class sockeye fishery on assumption.

4) "The Current Plan Failed" Is Not Proven

Proposal 61 argues the current plan has "failed" because king returns remained low in 2023 and 2024.

That conclusion incorrectly assumes:

- inriver sport, subsistence, and commercial restrictions should have reversed a broader statewide king crisis
- marine survival, climate stress, and generational recruitment collapse are irrelevant
- any poor return is evidence of management failure

ADF&G and BOF both know:

- many Alaska king stocks have failed under little or no fishing pressure
- ocean survival conditions are a dominant driver in recent years
- absence of recovery does not equal mismanagement

Policy should not be reactionary simply because outcomes are painful.

5) Sport Fishery Language Does Not Balance This Proposal

The inclusion of sport retention prohibitions may make the proposal appear balanced, but the scale of economic and allocative impact overwhelmingly falls on the commercial sector.

This is not a neutral conservation framework. It is a fundamental reallocation proposal packaged as stock-of-concern management.

The Board has a responsibility to separate genuine conservation necessity from allocation restructuring. Proposal 61 blends them.

6) A Better Path Exists

If additional conservation structure is needed in the future, it should be based on:

- continued improvement of assessment tools
- refinement within the existing plan
- carefully evaluated modifications
- adaptive flexibility for in-season management
- clear demonstration of biological benefit

Not permanent, rigid shutdown mechanics based on projections.

Conclusion

Nushagak kings absolutely deserve protection. I support strong management. I support conservation. But Proposal 61 is not the right tool.

It is overly rigid, economically severe, dependent on uncertain projections, reallocates burden disproportionately, and does not demonstrate measurable improvement beyond the tools already available in the current plan.

I respectfully urge the Board to reject Proposal 61, while continuing to support strong, science-based conservation strategies for Nushagak River king salmon.

Thank you for your time and your continued commitment to responsible fisheries management.

Respectfully submitted,

Justin Crump

PC62

Submitted by: Justin Crump

Community of Residence: King Salmon, AK

Proposal 63 – Nushagak District King Salmon Stock of Concern Management Plan (Sport Fish Provisions)

Position: Oppose

Chair Morisky and Members of the Board,

Thank you for the opportunity to comment on Proposal 63.

I appreciate the intent of this proposal and I fully support the goal of protecting and rebuilding Nushagak River king salmon. However, I do not support Proposal 63 because it hard-codes rigid regulatory restrictions into the sport fishery, removes necessary in-season flexibility, and advances structural rule changes without clearly demonstrating measurable biological benefit.

1) I Support Strong King Conservation — But It Must Be Scientifically Grounded and Flexible

Nushagak kings are a designated stock of concern. Conservation is appropriate and necessary. However, effective conservation policy must be biologically justified, linked to demonstrable outcomes, proportional to expected benefit, and flexible enough for ADF&G to respond to real-time run conditions. Proposal 63 does not meet those conservation standards.

2) The Proposal Removes Critical In-Season Flexibility

The Board very intentionally moved the sport fishery into Emergency Order management so that ADF&G could respond adaptively to changing run strength, real-time sonar trends, and environmental variability.

Proposal 63 would instead:

- codify mandatory “window” closure structures,
- prohibit retention of larger kings until a fixed inriver benchmark is achieved,
- and replace adaptive tools with static rule-making in a stock of concern system.

This greatly reduces management flexibility, removes important discretion from fisheries managers, and risks creating regulations that cannot effectively respond to the realities of an unpredictable and rapidly shifting stock.

3) There Is No Clear Evidence That These Measures Improve Escapement

This proposal assumes that tidal window closures, additional retention restrictions, and new reporting requirements will meaningfully increase escapement. However, it does not provide evidence demonstrating:

- that these measures materially improve passage or escapement,
- that they outperform the existing Emergency Order approach,
- or that they contribute meaningfully compared to other limiting factors affecting Nushagak Chinook productivity.

ADF&G and the Board should be cautious about creating permanent, rigid regulations that are symbolic in intent but unproven in outcome. Symbolic conservation is not the same as effective conservation.

4) Sport Fishery Adjustments Should Remain Under EO Authority

ADF&G’s Emergency Order authority is designed specifically for situations like this:

- stocks of concern,
- highly variable run timing,
- mixed-stock interactions,
- rapidly changing conditions,
- and complex interactions with sockeye and subsistence priority management.

Codifying rigid, one-size-fits-all rules reduces the State’s ability to make science-based in-season adjustments that match the actual run.

5) I Support Data Improvement, But Not Overregulation

Portions of Proposal 63 related to improving reporting and data accuracy have potential value. Better information benefits everyone. However, those ideas can be explored independently without permanently restructuring sport regulations or imposing unnecessary rigid closures.

Conclusion

I support strong conservation for Nushagak kings. I support responsible management. I support continued refinement of tools and continued commitment to stock rebuilding.

However, Proposal 63 is not the right strategy. It replaces adaptive, science-driven management with rigid regulation, lacks demonstrated biological benefit, and risks unnecessary harm to the guided and recreational sector without clear conservation gain.

I respectfully urge the Board to reject Proposal 63 while continuing to support strong, flexible, science-based management for Nushagak River king salmon.

Thank you for your time and continued commitment to responsible fisheries management.

Respectfully submitted,

Justin Crump

PC62

Submitted by: Justin Crump

Community of Residence: King Salmon, AK

Proposal 65 – Nushagak District King Salmon Stock of Concern Management Plan and Allocation Adjustments

Position: Oppose

Chair Morisky and Members of the Board,

Thank you for the opportunity to comment on Proposal 65. I have great respect for the history, culture, and economic importance of the Nushagak District set gillnet fishery and recognize the real hardship that many families and processors have experienced under recent management conditions. However, I respectfully oppose Proposal 65 because it attempts to solve allocation and economic equity issues inside a King Salmon Stock of Concern framework that must first and foremost remain biologically driven, unified, and conservation-focused.

1) The Nushagak King Stock of Concern Plan Must Remain Unified and Scientifically Grounded

The Nushagak stock-of-concern management structure was deliberately built around unified triggers, shared conservation responsibility, and in-season flexibility for ADF&G. Proposal 65 would fragment this system by establishing different timing triggers for set gillnet versus drift gillnet fleets, removing window protections at fixed calendar dates, and restructuring allocation calculations mid-crisis. These changes would weaken the structural integrity of the king conservation plan, reduce clarity for enforcement and management, and risk undermining consistent biologically grounded decision-making.

2) Proposal 65 Is Primarily an Allocation Proposal Wrapped in a Conservation Program

This proposal is driven largely by allocation outcomes and economic harm concerns rather than clearly demonstrated biological necessity. The Board has historically been careful about allowing allocation restructuring inside emergency conservation frameworks. That caution is warranted here. Allocation equity discussions are absolutely legitimate, but they should occur in the appropriate venue—not by weakening a critical stock-of-concern management tool while the stock remains in serious decline.

3) Biological Consideration: Protecting the Later Portion of the Chinook Run Matters

A key biological consideration that must guide Nushagak king management is that the later portion of the Chinook run is disproportionately important to escapement and future productivity. Early in the run, a high proportion of returning kings are often smaller jacks, which contribute relatively little to total spawning biomass. As the run progresses, a greater share of the returning fish are larger, older adult Chinook, particularly females, which produce dramatically more eggs and therefore provide far greater reproductive value. Chinook salmon fecundity scales strongly with body size, and studies consistently demonstrate that larger females contribute significantly more eggs per fish than smaller individuals. Protecting these later-arriving adult components of the run is therefore more consequential for escapement, genetic integrity, and long-term stock productivity than focusing conservation measures solely on earlier, jack-dominated portions of the run. (See Ohlberger et al. 2020, Transactions of the American Fisheries Society, documenting differential fecundity among Chinook salmon and the disproportionately higher reproductive value of large females.)

Proposal 65's attempt to relax protections after fixed calendar points risks misaligning management with biological timing, especially in variable run years.

4) Managers Need Flexibility, Not Rigid Gear-Specific Carveouts

ADF&G already has tools to adaptively manage in-season using emergency order authority, integrating sonar performance, timing, run shape, and king passage conditions. Codifying fleet-specific timing advantages, removing protections on fixed dates, and carving out allocation rules inside conservation packages would reduce management flexibility at a time when flexibility is crucial.

Conclusion

I support the long-term stability of the Nushagak District set gillnet fleet. Their hardship is real, their cultural presence matters, and their role in the regional economy is significant. But protecting and rebuilding Nushagak king salmon must remain the priority, and that requires a unified, biologically driven, and conservative framework.

For these reasons, I respectfully urge the Board to reject Proposal 65 while continuing to support strong, science-based management of Nushagak River king salmon and pursuing allocation discussions in appropriate, non-Stock-of-Concern venues.

Thank you for your time and your commitment to responsible fisheries management.

Respectfully submitted,
Justin Crump

PC62

Submitted by: Justin Crump

Community of Residence: King Salmon, AL

Proposal 66 – Nushagak District King Salmon Stock of Concern Management Plan – Sport Fishing Gear Restrictions

Position: Oppose

Chair Morisky and Members of the Board,

Thank you for the opportunity to comment on Proposal 66. While I appreciate the intent of the proposal and the experience of the proposer, I respectfully oppose Proposal 66. The proposal would significantly restrict sport fishing gear and methods under the King Salmon Stock of Concern plan despite the fact that existing ADF&G research indicates that current catch-and-release practices do not produce high levels of release mortality in the Nushagak River fishery.

1) ADF&G's Own Science Shows Catch-and-Release Survival is Already High

ADF&G conducted a multi-year radio-telemetry study of Chinook salmon caught and released in the lower Nushagak River sport fishery in 2017 and 2018. That study demonstrated that short-term survival of released Chinook was high, with a pooled survival estimate of approximately 93.4 percent (i.e., roughly 6–7 percent mortality). Year-specific estimates were similar and consistent across study years. This work replaced earlier assumptions and demonstrated that current angling methods on the Nushagak do not cause high release mortality.

In other words, the premise that current gear practices are causing large numbers of Chinook to die following release is not supported by ADF&G’s own science.

2) Most Released Fish Are Jacks, Not Large Adult Kings

It is also important to understand what fish are actually being released in the Nushagak sport fishery. Based on both ADF&G advisory discussions and extensive on-the-river experience, the majority of released Chinook in this fishery are smaller jacks rather than large adult kings. Large kings over 28 inches are relatively rare in the fishery in recent years, even on the best days of the season.

I have guided on the Nushagak River since 2009. Even in strong fishing years, we may only release a handful of fish over 28 inches across an entire peak period. The idea that banning bait, scent, or barbed hooks would meaningfully “save” a large number of adult Chinook simply does not align with what actually occurs on the river.

3) Gear Restrictions Would Add Burden Without Demonstrated Biological Benefit

ADF&G’s study already shows that released Chinook are largely surviving under current practices. Most of the fish released are jacks, which contribute much less to overall spawning biomass compared to adult females. There is no clear scientific evidence that the specific gear restrictions proposed here would materially change adult survival or measurably benefit escapement.

When managing a stock of concern, it is important that restrictions be evidence-based and proportional to demonstrated biological need. Proposal 66 does not meet that standard.

Conclusion

I fully support responsible, science-based conservation of Nushagak River king salmon. However, Proposal 66 imposes restrictive “methods and means” regulations without demonstrating that they would

meaningfully improve adult Chinook escapement or survival beyond what is already achieved under current practices.

ADF&G's own telemetry research shows that catch-and-release mortality in this fishery is low. Most released fish are smaller jacks rather than large, fecund adults. For these reasons, I respectfully urge the Board to reject Proposal 66.

Thank you for your consideration and continued commitment to responsible fisheries management.

Respectfully submitted,
Justin Crump

PC62

Submitted by: Justin Crump

Community of Residence: King Salmon, AK

Proposal 67 – Nushagak / Mulchatna Chinook Restrictions

Position: Oppose

Chair Morisky and Members of the Board,

Thank you for the opportunity to comment on Proposal 67. While I respect the authors and appreciate the conservation intent behind this proposal, I oppose Proposal 67 primarily because it would prohibit king salmon retention in the lower Nushagak River when escapement projections fall below 55,000 fish, relying heavily on sonar performance and projection systems that ADF&G has documented as uncertain for king salmon enumeration.

1) Proposal 67 Ties Major Restrictions to a Projection System ADF&G Has Acknowledged Is Uncertain

ADF&G's recent Nushagak Chinook Stock Status reports (including SP25-18 and related Board of Fisheries briefing documents) clearly describe the difficulty of accurately estimating king salmon abundance using the Portage Creek sonar program. The department has explicitly acknowledged:

- enumeration error increases substantially in years of high sockeye abundance
- species apportionment challenges affect accuracy
- uncertainty bands in estimates are wide enough that management triggers may not always reflect true in-river abundance

ADF&G's own technical analysis demonstrates that Nushagak Chinook sonar projections contain a meaningful degree of uncertainty, especially during intense sockeye passage. Building rigid, high-consequence sport fishery closures off those projections is risky and may not reflect biological reality on the river.

2) This Proposal Would Unnecessarily Remove Retention Opportunity in the Lower River

Proposal 67 would ban bait, prohibit retention, and maintain only catch-and-release in the lower river even when in-season sonar projections—which are known to struggle with precision—suggest escapement may miss the lower SEG bound. I do not believe it is appropriate to automatically eliminate all retention opportunity for the entire lower river based on projection systems that ADF&G itself has flagged as unreliable for management precision.

3) The Upper River Closure Concept Is Reasonable; The Lower River Retention Ban Is Not

Protecting exhausted, late-run spawners in the upper Mulchatna and upper tributaries is reasonable and biologically defensible. However, Proposal 67 goes further by imposing river-wide retention prohibitions tied to uncertain projections.

ADF&G already has emergency order authority to act if run collapse becomes clearly evident. Mandating full retention prohibitions by regulation—based on a system widely acknowledged to be statistically challenged—is unnecessary and excessive.

4) Conservation Measures Must Be Proportional and Justified

I fully support conservation of Nushagak kings. However, regulatory restrictions should be supported by reliable assessment tools, be proportional to demonstrated risk, and avoid unnecessary loss of opportunity. Proposal 67 does not meet that standard.

Conclusion

Nushagak king conservation is important, and upper-river protections for vulnerable spawning fish may warrant consideration. However, tying lower-river retention prohibitions to sonar-based escapement projections that ADF&G has formally documented as uncertain is neither sound management practice nor fair to anglers.

For those reasons, I respectfully urge the Board to reject Proposal 67.

Thank you for your time and continued commitment to responsible fisheries management.

Respectfully submitted,
Justin Crump

PC62

Submitted by: Justin Crump

Community of Residence: King Salmon, AK

Proposal 69 – Adopt Recovery Goal for Nushagak River King Salmon

Position: Support

Chair Morisky and Members of the Board,

Thank you for the opportunity to comment on Proposal 69. I strongly support Proposal 69 because it establishes clear, science-based recovery criteria for Nushagak River Chinook consistent with the Department's Stock Status and Action Plan recommendations.

1) This Proposal Brings Structure, Accountability, and Clarity

When the Nushagak Chinook Stock of Concern designation was adopted, ADF&G recommended a recovery framework defining how and when the system should transition out of conservative management. However, those exit criteria were never formally codified. Proposal 69 corrects that gap.

By adopting objective recovery benchmarks—meeting the 55,000 SEG lower bound in either three consecutive years, or four out of six years, and expected to continue being met—the Board creates a stable, transparent standard that is biologically meaningful, administratively consistent, and publicly understandable. This strengthens confidence in both the management process and in recovery planning.

2) This Proposal Aligns With ADF&G's Own Science and Guidance

These recovery criteria were developed and recommended by ADF&G scientists. They reflect the same biological logic used elsewhere in Alaska fisheries and follow the principles of 5 AAC 39.222, the Statewide Sustainable Salmon Policy.

Codifying that framework ensures that recovery standards remain grounded in science, decision-making is protected from short-term political or user-group pressure, and managers, fishermen, and the public understand what recovery truly means.

3) This Proposal Does Not Automatically Add Restrictions

Importantly, Proposal 69 does not impose new direct closures, allocation changes, or gear regulations by itself. It simply ensures that, while the stock remains in a concern status, management remains conservative and recovery is judged against a clear biological standard. ADF&G retains flexibility under emergency order authority to manage real-world conditions while operating inside a structured recovery framework.

4) Consistent Standards Build Trust

Clear, measurable recovery criteria create confidence for all users—subsistence, sport, and commercial alike. Everyone benefits from knowing the goals, the benchmarks, and the path forward.

Conclusion

Proposal 69 formalizes a scientifically supported recovery goal, strengthens consistency in management, and ensures conservative stewardship while providing clarity to all user groups.

For these reasons, I respectfully urge the Board to adopt Proposal 69.

Thank you for your time and commitment to sustainable fisheries management.

Respectfully submitted,

Justin Crump

PC63

Submitted by: Deven Damerau

Bristol bay permit holder

Community of Residence: naknek

please appose 44,61-68

Submitted by: Tristan Demers

Community of Residence: Bellingham Wa

I oppose prop 44 and 61-69, we can't restrict fishing anymore to try and save a few kings. We're already letting too much early sockeye upriver as it is. No way this makes sense

Submitted by: Nicholas Dowie

Dowie Fisheries, LLC

Community of Residence: Ekuk, AK/Laramie, WY

Chair Carlson-Van Dort and Members of the Board,

My name is Nicholas Dowie. I am a lifelong 4th generation set gillnet fisherman in the Nushagak District. My family has been fishing in Ekuk since 1955. I first became a permit holder in 1996, my wife is a permit holder and my children. Our family business, Dowie Fisheries, LLC has 5 family permits.

Family owned operations in Ekuk have stayed consistent over the year. The relationships on the beach are long-standing and storied. Almost everyone on the beach has grown into the fishery since infancy. For many of us, this is our forever home and the one thing that brings the most consistency to our lives.

Our primary concerns stems from recent changes to management that have affected the future sustainability of this fishery for us and our children. We have lost much of our harvest share in the Nushagak. Because of this, we are limiting our comments, at this time, to four specific proposals that help fishermen in Ekuk.

Below are our comments for these specific proposals.

56: Support. This boundary line was necessary for Ekuk based on coastal erosion and inconsistency of the previous boundary line. Without this boundary almost everyone on the beach would have needed to move their historical "outer end" shore ward. This would have been a tragedy, as it would have furthered limited our harvest while abandoning the traditional establishments of our sites. This seaward boundary is now fixed and not arbitrary. Additionally, this proposal was agreed upon during the last meeting cycle and had both drift and set gillnet support. This specification should be adopted and the sunset clause removed.

57: Support. Protection for set gillnet operations is critical. Ekuk currently does not have any restrictions for a buffer between drift and set gillnet gear. Every year, gear is damaged on the beach and results in lost fishing time for set gillnet fishermen. Ekuk has had many challenges in recent years and would greatly benefit from having a clear and enforceable boundary to prevent this type of unnecessary loss.

65: Support with amendments. This proposal is about maintaining the allocation and management, not the stock of conservation concern management plan. Allocation has protected the set gillnet fleet for decades. It was specifically set up so the stationary user group would be protected from a high influx of drift vessels in the Nushagak. We have seen record years for drift vessels recently, and this has greatly impacted our historic share of the harvest. Without the past protection from the allocation plan, Ekuk would have likely lost its local processor. Any attempts to turn Ekuk into a buying station or moving fish off the beach result in diminished quality and value for our salmon. Loss of our onshore facility would be catastrophic. Additionally, Ekuk is known in the industry as having one of the best sockeye products in the Bay, this is because no tenders are used and fished are processed almost immediately after harvest.

Reestablishing and maintaining the allocation in the future is critical. Over recent years, the loss of harvest share has impacted many set gillnet fishermen, but Ekuk has been impacted the most.

80: Support. This would allow more flexibility and versatility for small set net operations. This would allow for efficiencies in their operations such as comingling their harvests and in deliveries to a tender or processor.

Thank you for your service, time and consideration.

Nicholas Dowie

PC66

Submitted by: David Driscoll

Community of Residence: king salmon

concerning pro 44,61-68

obviously the science is not in yet to have a change in policy this alone should negate any discussion of prop 44,61-68.

on a historic bases and fishing the bay since 1988 and fishing Nush for many years, most recently for the past 10-12 years for sockeye and including most of the early years I fished for the king season. The problem doesn't seem to me to be the gill netters as history bears out but rater high seas interception. the evidence of this is irrefutable and I'm sure is in the boards possession. By catch from the gill net fisheries is insignificant compared to the high sea fisheries.

As to why it's a bad idea economically, Over escapement, as a biologist I studied population dynamics in the aquatic environment while working for the EPA. findings are irrefutable and can be born out from history with the kvichak river system when 10million escaped sockeye salmon where allowed in the 90s for a few years what followed was a terrible crash of sockeye population for (again I unfortunately I was effected) quite a few years which forced economic hardship upon the local and remote fishers that relied on the kvichak for their livelihood.

because of these reasons I am against this proposal being adopted.

thank you for your time

PC67

Submitted by: Dylan Dunsmore

Community of Residence: Bristol Bay

44, 61,62,63,64,65,66,67,68

These will drastically effect the forthcoming bristol bay sockeye runs, and undermine the vast efforts of multiple parties: of managing, forecasting, and preserving the chinook salmon

Submitted by: Ken Dunsmore

Community of Residence: colorado

proposal 61

This proposal, while having good intentions to help revive the King salmon returns, is just short of RIDICULOUS. Putting the proposed restrictions on the commercial fleet prior to July 4 is ignoring the fact that the TOP 3 single day harvests have all been PRIOR TO JULY !st!!!! implementing this proposal will GUARANTEE over escapement of both the Wood and Nushagak rivers leading TO THE DECLINE OF BOTH RIVERS SOCKEYE RUNS!!!

This proposal is a DISASTER. im using my 40 YEARS of bristol bay fishing experience to formulate this opinion.

t



Public Comment to the Alaska Board of Fisheries Bristol Bay Finfish Meeting

Madam Chair and Members of the Board,

The Ekuk Beach Fishermen's Association (EBFA) respectfully submits these comments on behalf of our 70 members and the multi-generational set-net families who fish Ekuk Beach in the Nushagak District. We are deeply invested in Ekuk, the Bristol Bay watershed, and the long-term sustainability of Alaska's fisheries.

Ekuk is a seasonal community 16 miles South of Dillingham that supports approximately 500 seasonal jobs. It is a meaningful economic driver within the district. The Ekuk set-net fleet includes 103 permits that primarily deliver to Alaska's Best Seafoods, and the fleet includes substantial local participation (including watershed residents, 43%, and other Alaska residents, 26%) tied to community stability and local infrastructure.

EBFA's priorities for this cycle are straightforward: (1) maintain stability and allow the Nushagak Chinook framework to be evaluated on an appropriate biological timeline; (2) adopt proposals that support an orderly and safe fishery; and (3) acknowledge and address the compounding economic and community harm caused by persistent missed set-net allocation in the Nushagak District.

Maintain Stability in the Nushagak Chinook Management Plan

EBFA supports allowing the Nushagak Chinook management framework to be evaluated against Chinook biology. Chinook are long-lived fish, and credible evaluation requires a management horizon that reflects their 7-year life cycle. We also note that the current Stock of Concern approach and associated regulatory structure emerged from one of the most extensive public and technical review processes in recent Bristol Bay history. The Board formed the Nushagak-Mulchatna King Salmon Committee to develop a comprehensive solution for management action relating to declining Chinook populations. The Committee worked for five years with broad stakeholder representation, and the resulting consensus Stock of Concern management framework and related measures were unanimously adopted by the Board in March 2023.

Importantly for the Board's evaluation: after three seasons under the new framework (2023–2025), BBSRI's published performance summary reports that the plan consistently

delayed the commercial season start by 2–5 days, enabling an additional 6,500–10,800 Chinook to pass annually before exposure to harvest, and that start triggers and Optimum Escapement Goal (OEG)-driven breaks corresponded to an average reduction of approximately 240 commercial fishing hours before July 5 (about a 42% decrease compared to the previous management structure).

EBFA urges the Board to avoid structural resets midstream and instead focus on (a) establishing an evaluation window that matches Chinook biology, and (b) improving implementation and equity outcomes within the existing framework.

Support for Proposal 56: Predictable and Enforceable Spatial Considerations

EBFA strongly supports Proposal 56, which would make Ekuk's coordinate-based offshore set-net boundary, passed unanimously by the Board in 2022, permanent. The coordinate line has been working on Ekuk Beach as a clear, enforceable seaward boundary. Making it permanent provides certainty for set-net site placement, drift operations, and enforcement. The former, tidally dependent, measurement structure was neither workable nor enforceable and contributed to confusion and ambiguity for all gear groups. A return to that structure would be a step in the wrong direction. The Alaska Department of Fish and Game (ADF&G) supports boundary lines based on GPS coordinates as clear and easy to enforce.

Support for proposal 57: Orderly, Safe, and Enforceable Fisheries

Proposal 57 complements that clarity by reducing the risk of entanglement, gear loss, and hazardous interactions near the beach. The proposal creates a clear, enforceable line and comprehensively describes key set-net gear vulnerable to damage by drift fleet interactions. These measures codify clear spatial rules and gear definition clarity that minimize conflict, prevent gear damage, and improve safety for everyone operating in close quarters.

The drift fleet in the Nushagak has steadily increased in numbers and horsepower over the past decade. Where we once shared the district with approximately 400 boats in a season, we now routinely share space and harvest with over 900. The fleet is still growing. Since 2021, the drift fleet has increased by more than 16% with an average increase of over 100 horsepower since 1990, with disproportionate increases in the non-resident fleet. New-technology jet engines have joined the fleet with 1,000+ horsepower and the ability to haul 50,000+ lbs of salmon. We are dealing with a new fleet that has drastically changed the fishery and must adapt our regulations accordingly.

In recent years, set-net fishermen along Ekuk and Clark's Point have experienced increasingly frequent and costly conflicts with drift vessels operating close to shore. As the drift fleet has grown in size, horsepower, and maneuvering capability, boats and nets are routinely passing through set-net lines, anchors, and pulleys. Even brief contact can cause catastrophic failure: broken running lines, torn web, displaced anchors, fouled blocks, and dangerous recoil under heavy tidal tension. These incidents result not only in damaged gear and lost income, but also in real safety hazards for crews working on the beach and in skiffs. Many of these events occur during short, high-value openings when inability to complete

repairs mean missing entire tides, sometimes compromising the remainder of a season if outer anchors cannot be safely accessed. Proposal 57 is necessary and overdue because these conflicts are no longer isolated accidents; they reflect structural crowding and unclear rules in the near-shore zone that can only be addressed by clearly separating gear types and preventing physical contact with set-net sites and equipment. ADF&G supports proposals that decrease gear conflicts and promote orderly fisheries.

Support for Proposal 80: Joint-Venture Set-Net Operations

EBFA supports Proposal 80 to authorize joint-venture set-net operations under defined conditions. This would allow two permit holders to register under a joint venture permit to share equipment and comingle their catch. Joint ventures help small, family-based operations adapt to short openings, rising costs, shrinking crews, and safety challenges without increasing fishing footprint or promoting consolidation. This approach has worked successfully in Kodiak set-net fisheries for over four decades.

The proposer has had productive, positive conversations with ADF&G. The Department is willing to clarify its delivery regulations to accommodate joint deliveries by either member of the joint venture.

Economic and Community Harm From Persistent Missed Set-Net Allocation

The Board has long recognized that allocation decisions have real community consequences. In the Nushagak District, the target allocation is 74% drift and 26% set.

Yet recent outcomes demonstrate sustained shortfalls for set-net fishermen. ADF&G data compiled by Wink Research & Consulting show that since 2021, the district set-net share has declined by an average of 6%, even when including set-net harvests in the Wood River Special Harvest Area (WRSHA).

These losses translate directly into processor instability, reduced family income, reduced local spending, and growing pressure on watershed residents to exit the fishery, which is precisely the kind of compounding harm the Board has repeatedly sought to avoid. When allocation exists on paper but is not achieved in practice over multiple years, the social and economic fabric of communities like those in Bristol Bay is weakened.

EBFA urges the Board to treat this as a material policy problem: a sustained failure to meet set-net allocation has predictable and preventable community consequences. Proposals that improve safety and order, and tools that improve resilience without increasing footprint, are part of preventing further harm while broader allocation and implementation issues are addressed.

Requested Board Action

EBFA respectfully asks the Board to:

1. Maintain stability in the Nushagak Chinook management framework and allow evaluation over a biologically meaningful time horizon, recognizing the extensive stakeholder process that produced the current structure and the documented performance effects to date.
2. Adopt Proposal 56 to make permanent the successful seaward boundary adopted by the Board in 2022.
3. Adopt Proposal 57 to improve safety, reduce gear conflict, and ensure clear, enforceable boundaries and gear definitions for an orderly fishery.
4. Adopt Proposal 80 as a limited mechanism to improve set-net operational resilience and safety without promoting consolidation or increasing fishing footprint.
5. Acknowledge and consider the documented economic and community harm caused by persistent missed set-net allocation in the Nushagak District, including the quantified losses borne by set-net families and the local economy.

Thank you for your consideration and for your service to Alaska's fisheries and fishing communities.

Respectfully submitted,
Jamie O'Connor
Board Chair, Ekuk Beach Fishermen's Association

Submitted by: Feodor Erofeeff

Community of Residence: Oregon

The proposal 44.61 through 68 needs to be as is we need to look at trollers i had a deck hand that worked on one that targeted flounders the same time as the king's were coming through that was just out side off igushik ,he's said they were throwing out so many king's he could not believe that they were letting them drag there at that time of the year and if any thing needs looking after that is the west side and above Clark's point no deliveries of kings on the south line but at Clarks people that fish the west beach

December 29, 2025

Alaska Board of Fisheries
Board Support Section
ATTN: BOF Comments
PO Box 115526
Juneau, AK 99811-5526

Re: Opposition to proposal 61 and 62

Dear Chair Marit Carlson Van-Dort,

My name is Nels Evens, a lifetime commercial fishermen and Executive Director of Petersburg Vessel Owners Association (PVOA). These are my personal comments and not those of PVOA, which have been submitted separately. I have been an active participant in the Bristol Bay drift gill net fishery as a D permit holder from 2015-2017 and the owner/operator of a Bristol bay drift vessel from 2018-present. The Bristol Bay sockeye fishery has been one of the shining stars of Alaska's commercial fishing industry in recent years and has allowed me the opportunity to become a commercial fishing captain and further diversify my fishing business. I intend to keep my comments focused on proposals that can compromise the world's last great wild salmon commercial fishery.

Proposals 61 and 62:

I am opposed to proposals 61 and 62. Proposals 61 and 62 would greatly reduce the commercial fishing opportunity for both the drift and set gill net fleets in the Nushagak and by extension, all other districts in the Bristol Bay fishery. If opportunity were to be substantially limited in the Nushagak, it would push vessels to other districts looking for fishing opportunity, splitting the fish pie into smaller slices for all districts.

The current Nushagak King Salmon Management Plan was developed under a Board sanctioned working group to develop a framework that could balance both the needs of king salmon escapement and sockeye harvest. The current management plan and its framework have been successful in increasing the number of kings up the Nushagak River through moderate reductions in commercial fishing time. The framework of the plan is structured by setting OEGs and escapement triggers to determine when and how to open and close commercial fishing opportunity in the Nushagak District.

Rather than replace the current management plan with something new that could cause great harm to the fleet, it would be more prudent to review the OEGs and fishery opening triggers to best optimize the balance of king escapement and commercial harvest of sockeye. The current plan has only been in place for 3 seasons, 2023-2025, and king escapement has increased, but that is not the only indicator of the plan's effectiveness. King returns from those increased escapement numbers are also

important and must be factored in. Due to the recency of the current management plan, 3 years, and the lifecycle of king salmon, 4-7 years, it is irresponsible to start managing under a completely new plan before knowing the true effectiveness of the current plan, especially when the escapement has been improving.

Thank you for allowing me the opportunity to share my comments with the Board and look forward to clarifying any lingering questions Board Members may have.

Thank you,
Nels Evens

BEFORE THE ALASKA BOARD OF FISHERIES
FOR THE 2026 BRISTOL BAY MEETING AT ANCHORAGE

Opposition to Proposal 44

Proposal 44 asks to “Limit the number of king salmon retained as homepack in the commercial fishery and in the subsistence fishery and report all king salmon harvested”.

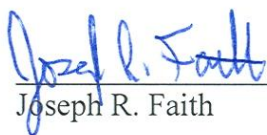
Subsistence users already are required to obtain subsistence salmon permits¹ and to report their daily subsistence salmon catch totals². In the past, ADF&G has sent out a threatening letter to subsistence permit holders who don’t timely submit the report (October 31st deadline).

I disagree with a limit on subsistence harvesters. Subsistence has a priority over sport and commercial fishermen for good reasons. Nushagak river subsistence harvesters use king salmon for their food, family, and culture. Food and gas are expensive at Dillingham, and way more in the villages. When I see lear jets parked at the Dillingham airport at the peak of each salmon run, it’s difficult to imagine the wealth difference between the lear jet passengers and Nushagak river subsistence harvesters.

I agree that all fishing groups should help conserve king salmon. Subsistence users, however, already help conserve king salmon by fishing only set nets limited to 10 or 25 fathoms on the beach almost entirely and dip nets limited to the beach³. Subsistence users pretty much miss king salmon staying in the channels.

As for commercial fishing, it is very difficult for me to keep king salmon for personal use because I have to travel back to Dillingham and freeze them. I could easily miss a red opening and lose money by doing that. I, however, do respect the opportunity for commercial fishermen from the villages who want to take kings back to their villages to do so.

I live at Dillingham and commercial and subsistence fish. Thank you.



Joseph R. Faith

¹ 5 AAC 01.005 (a) (subsistence salmon permit mandatory), and

² 5 AAC 01.005 (b) 1-7) and (c).

³ 5 AAC 01.320 (c)(1)(B and C) (set nets 10 fathoms) and (c)(2) (set nets 25 fathoms), and 5 AAC 01.320(b) and 01.310 (d) (dip nets).

BEFORE THE ALASKA BOARD OF FISHERIES
FOR THE 2026 BRISTOL BAY MEETING AT ANCHORAGE

Opposition to Proposals 54 and 55

ADF&G asks for repeal of the Nushagak River Coho Salmon Management Plan, due largely to a lack of escapement enumeration data.

Nushagak coho salmon should still be managed as actively as possible. Nushagak coho salmon are extremely important for many reasons.

A major reason is that Nushagak coho spawn in and near the Pebble Mine project. Researcher Dr. Carol Ann Woody and her associates for the Nature Conservancy of Alaska captured 18 Coho salmon rearing on an unnamed tributary to the North Fork Koktuli on September 2, 2008.¹ The headwaters of the North Fork Koktuli overlie the proposed Pebble Mine project. During 2008-2010, they visited 137 sites and documented salmon including Coho and Chinook in 3 out of 4 streams surveyed.²

ADF&G's proposal leads one to believe that Nushagak coho salmon have become unimportant. This allows the Pebble promoters to claim that Nushagak coho are not important anymore, and that Pebble mine has another reason to proceed. ADF&G is the fish champion in the eyes of citizens and should not be even an accidental participant to a claim against Nushagak coho in favor of Pebble mine.

Just because coho numbers aren't being enumerated doesn't mean coho numbers are down every year. But assuming they are down now, it doesn't mean they will always be down in the future. In 1973, the total Bristol Bay red run was 2.5 million.³ In 2022, the total Bristol Bay red run was 79.1 million.⁴ I'm confident that coho numbers will rebound, just as the red numbers did.

Nushagak coho are also a very important subsistence resource. Direct marketers commercially sell Nushagak cohos when the processors shut down. Commercial fishing for Nushagak cohos has occurred as recently as 2024.⁵ The sport fishery catches cohos as well.

The Board of Fish should still make a regulation for Nushagak coho. It should make a statement about how important Nushagak Coho are. ADF&G should still manage for sustained yield as much as practical. Subsistence use should be given a priority. Commercial and sport harvests should be allowed in the discretion of ADF&G. ADF&G should also report the numbers of Nushagak Cohos that are caught in the subsistence, commercial, and sport fisheries no later than December 1 each year. ADF&G should operate the Nushagak River sonar for coho salmon if funding becomes available.

I live at Dillingham and commercial drift and subsistence fish.



Joseph R. Faith

¹ State of Alaska Department of Fish and Game, Division of Sport Fish, Nomination Form, Anadromous Waters Catalog dated September 12, 2008, p. 1

² National Park Service, Environmental Baseline and Mining in Remote Alaska, pgs. 5-7.

³ Krasnowski and Randall, ADF&G Technical Data Report No. 22, Bristol Bay Sockeye Salmon 1973, p. 3.

⁴ 2022 Bristol Bay Area Management Report, No. 23-08, p. 4

⁵ 2024 Bristol Bay Area Annual Management Report, p. 5 (31,021 commercial harvest) and p. 64 (Appendix A7 showing coho commercial harvest from 2004-2024)



Joseph R. Faith

BEFORE THE ALASKA BOARD OF FISHERIES
FOR THE 2026 BRISTOL BAY MEETING AT ANCHORAGE

Opposition to Proposal 57, and to the extent it relates to Proposal 56, it too

I oppose Proposal 57's proposed revision of 5 AAC 06.331(n) "and no part of a drift vessel, gillnet, line, buoy, or other device used to drift a gillnet may be shoreward of the following offshore locations while the drift gillnet is in the water:"

The proposal fails to give proper notice and fails to provide a meaningful opportunity to comment. 99% of the public has no clue where the following offshore locations are. The offshore locations of the regulations are not listed in the proposal. A layman might think that the proposal does not affect him/her when it does affect him/her. The proposal apparently wants to impose criminal penalties on drift netters for violation of the proposed regulation if enacted. A layman should not be required to find the regulations at a law library or ADF&G's website. The proposal must give the public notice of those offshore locations.

The proposal does mention Ekuk beach. Ekuk beach, however, is not mentioned anywhere in the subsections of the regulation. Ekuk isn't even mentioned in the regulation subsections.

Both the proposal and regulation fail to mention Flounder Flats. Yet, a 1/5th mile wide (1100 feet) and approximately a 9.9 mile long corridor is being proposed for Flounder Flats¹ (which is not part of Ekuk beach). Over 70 percent of the proposal is for Flounder Flats. Flounder Flats is well known by its name (not Ekuk beach). Flounder Flats should have been mentioned somewhere in the proposal to give notice and a meaningful opportunity to comment.

Further, the proposal fails to give meaningful notice whether it means a) going from each of the 19 latitude and longitude coordinates of the offshore locations shoreward in a straight line at a 90 degree angle, b) going from each set net in a straight line perpendicular to the beach out to a point where it intersects a line between two sets of latitude and longitude coordinates of the offshore locations, or c) connecting coordinates of one offshore location to the coordinates of another offshore location from the first location to the last one parallel to the shoreline to form a boundary line that cannot be crossed by a drift netter. It makes a big difference on which one is being proposed. A layman should not have to guess and then guess wrong.

If the proposal is creating a boundary over which no drift netter fishing a net can cross, the proposal violates the common use, no exclusive fisheries, and uniform applications of the law provisions of the Alaska Constitution. Alaska Const., Art. VIII Secs. 3, 15, and 17 This proposal creates a monopoly that will control the fish, water, and land under the water in a corridor totaling approximately 13.9 miles long for a small number of fishermen.

First, this monopoly effectively shuts out other set netters. Set net leases already give rights to lease holders to specific tracts to exclude other set netters. All set net lease sites are already taken for approximately the first 7.4 miles of the proposed area. The set net lease system is bad enough because it prevents other set netters from fishing an area and creates a nearly permanent property interest for the lease holders.

The set net tracts in the Ekuk/Flounder Flats area extend seaward roughly 450 feet. The prohibitions, however, don't stop at the end or side of these lease tracts.

Other set netters are prohibited from set netting "seaward" of a set net operated by another set net permit holder in the Ekuk area. 5 AAC 06.331(n) A second seaward prohibition guarantees the exclusion of other set netters from the Ekuk/Flounder Flats area--seaward of the offshore locations. 5 AAC 06.331(n).

¹ Pages 3 and 4 attached were obtained from the Alaska DNR website. They show the set net lease tracts from the Ekuk Range marker to Ekuk beach to Flounder Flats ending at Etolin Point. The Ruler on the website page was used to measure distances.

Set netters in the Nushagak district must keep a distance of 450 feet from another set net, whether its seaward, shoreward, or side ways. 5 AAC 06.335 No other district--Naknek-Kvichak, Egegik, Togiak, or Ugashik—has a 450 ft. distance. The other districts have a 300 ft. distance. 5 AAC 06.335

Other set netters in the Nushagak district must give 48 hours notice to transfer to fish in the Ekuk statistical area. 5 AAC 06.370 (a) and (l) This effectively deters other set netters from transferring into the Ekuk statistical area. No other district has a 48 hour transfer notice for set netters to fish in another location in their districts. Those set netters in other districts apparently can just move if they find an open spot to fish and can put the spot to productive use.

It is not just about control of the fish, but also the water, and the land under the water to exclude other set netters that's important.

Violation of a regulation can subject a set netter to fines and potential jail time in criminal court. AS 16.05.722 and 723.

Besides other set netters, drift netters now will be excluded from traditional drift fishing grounds by the proposed exclusive set net grounds for a small number of set netters. Drift fishermen fish the Ekuk beach area during the red season when no set netter is fishing due to the Ekuk cannery being plugged, or to weather. Roughly 14-20 years ago during fall fishing, no set netters usually were fishing the Ekuk beach. I fished it for cohos and pinks, and sold them to a processor or by direct marketing.

Flounder Flats has historically been fished by countless drift fishermen. Some drift fishermen fish in areas of Flounder Flats covered by the proposal where or when no set netter is fishing. There aren't even any sites for miles out toward Etolin Point (approximately 5.2 miles with no sites and 5.9 miles with only one site). Drift fishermen should have the opportunity to catch those fish when or where no set netter is fishing. A set netter at one end of the proposed area should not be able to prevent a drift netter from fishing miles away—up to 13.9 miles away.

Set nets are limited to 300 feet in length. This will often leave open water not being fished, subject to restrictions for distances between gear. Yet drift fishermen will be excluded from fishing these waters.

It's not just about control of the fish but also the water and the land under the water that's important. Nobody gets to control the land under the water, the water, and the fish that swim in the water over the land to the extent of this proposal. Nobody owns a fish until it's caught. The opportunity to fish in waters when or where no set netter is fishing within the Nushagak main district during a drift period should not be denied.

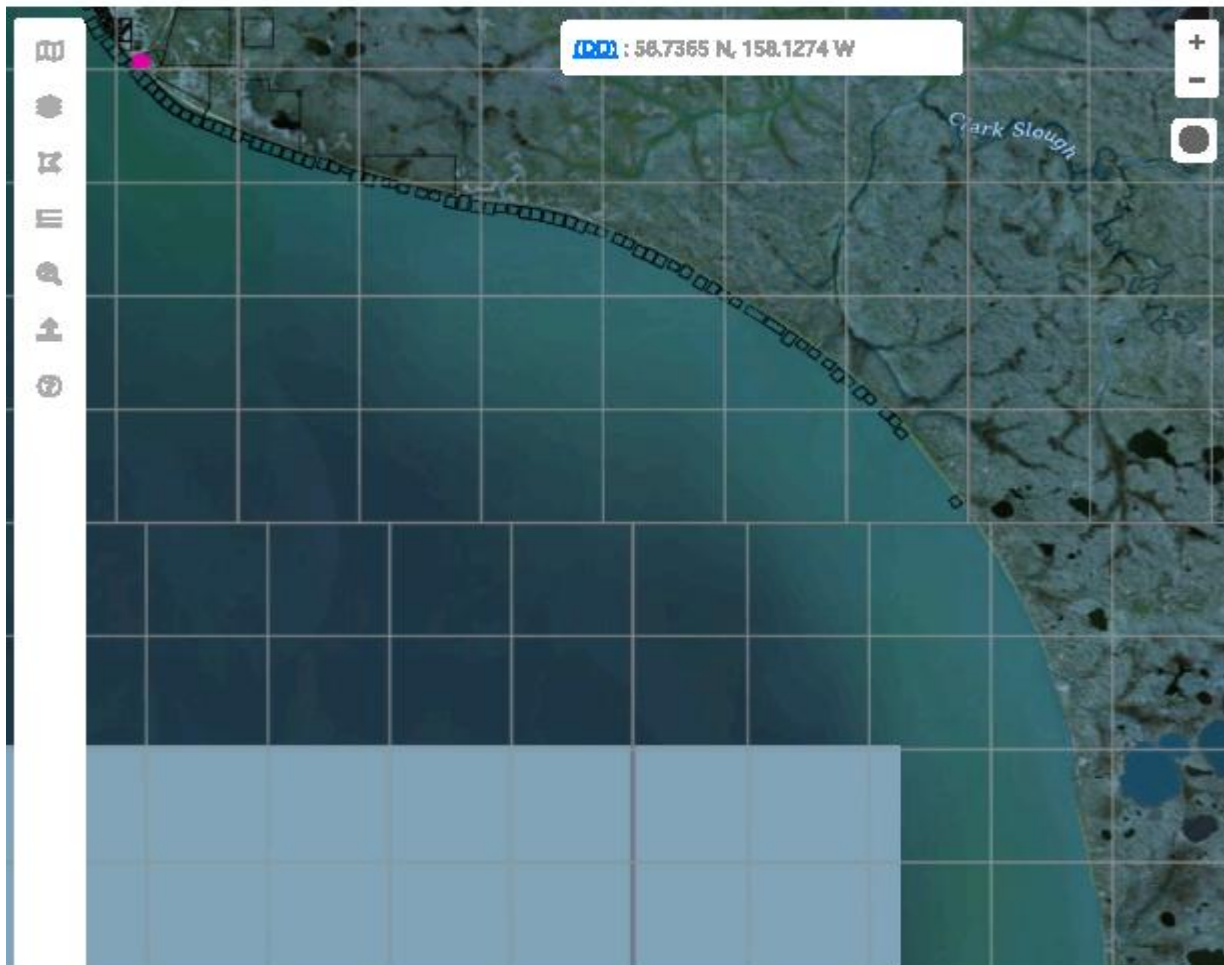
Violations of a regulation can subject a drift netter to fines and potential jail time in criminal court. AS 16.05.722 and 723.

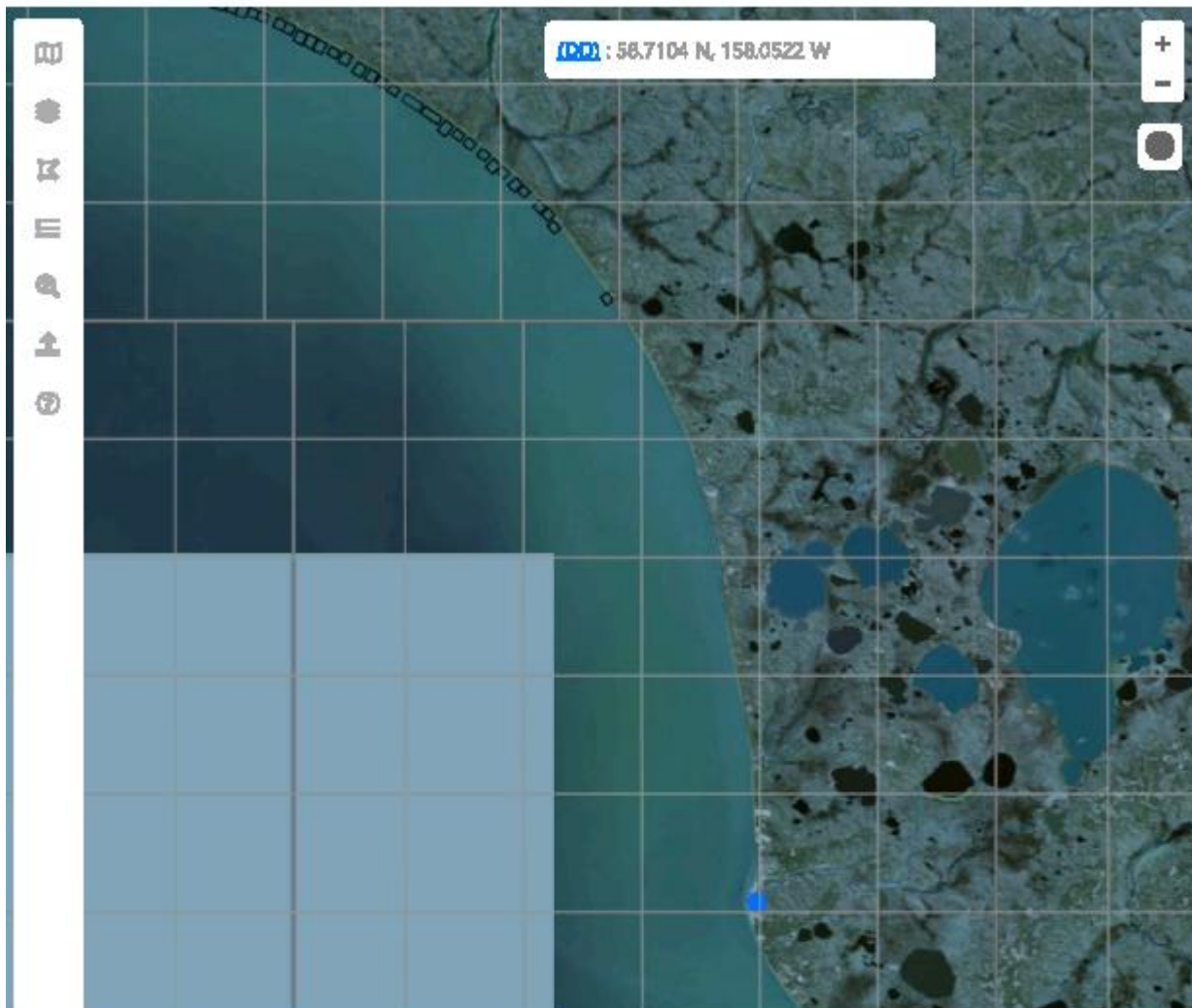
Once both set netters and drift netters are prohibited from the proposed area, the proponents will have completed the prohibitions by effectively excluding both set netters from the first 7.4 miles and drift netters from the entire 13.9 miles of the proposed Ekuk/Flounder Flats area. This kind of control to exclude both set netters and drift netters by a small group for several public resources to a large public area violates the common use, no exclusive fisheries, and uniform applications of the law provisions of the Alaska Constitution.

I do agree that reasonable restrictions should apply to the set net itself. I don't like it when anybody's net interferes with anybody else's net. Regulations, however, already provide for reasonable minimum distances between units of gear. No drift net may be operated within 300 feet of the side of a set net and 100 feet of the offshore end of the set net. The inshore Nushagak restriction is 100 feet. 5 AAC 06.335(a-b) I'm fine with these restrictions. In the Ekuk/Flounder Flats area, however, no drift gill net may be operated inshore of a set gill net at all. 5 AAC 06.335(c) This is over reach because when a set netter moves out, a drift netter should be allowed to fish inside of the set netter. Nobody owns a fish until its caught, or should get to control the water its swimming in and the land under the water its swimming in to the extent of this subsection 355(c).

I live at Dillingham and commercial drift fish. Thank you for your time and consideration.


Joseph R. Faith





5000 ft



BEFORE THE ALASKA BOARD OF FISHERIES
FOR THE 2026 BRISTOL BAY MEETING AT ANCHORAGE

Opposition to Proposals 61, 62, 63, 65, and 68

These proposals ask to modify the current Nushagak King Salmon Stock of Concern Plan.

The BOF took a hard look at the concerns for Nushagak king salmon at a meeting in November 2022 and a special one in March 2023. The BOF reviewed ADF&G's summary of the background of Nushagak king salmon, its basis for its recommendations, and its recommendations. ADF&G's recommendations were based on research, monitoring of the stock, and criteria for future delisting. Based on this and information from its meetings, the BOF developed the contents of the Plan contained in regulation 5 AAC 06.391.

It is too soon to determine whether the Plan will achieve its goals. We haven't even gotten through a full king salmon generation. The BOF's current plan also allows ADF&G flexibility in its management, which would be reduced by these proposals.

All user groups should contribute to the conservation of Nushagak kings. Commercial fishermen, however, have contributed to conservation by greatly reducing their harvest of Nushagak kings. (2023) 5,785 kings, harvest below 20 year average; (2024) 2,438 kings, harvest below 20 year average; (2025) 3,625 kings, harvest 86% below 20 year average¹. Commercial fishermen have also sacrificed income in the interest of conserving Nushagak king salmon by starting later than usual to fish.

Frankly, it's been difficult to find numbers on the conservation efforts of the sport and subsistence users. I hope that the BOF obtains these numbers.

I've lived at Dillingham since 1992. I've subsistence fished since then. I've also drift fished predominantly the Nushagak district for over two decades. I thank you for your time and consideration.



Joseph R. Faith

¹ 2023 Bristol Bay Area Annual Management Report, p. 5 (also express that data indicated that Nushagak king run was larger than the sonar count of 31,499; 2024 Bristol Bay Area Annual Management Report, p. 4 (also expressing that data indicated that the Nushagak king run was larger than the final sonar count of 42,621), and 2025 Bristol Bay Salmon Season Summary, September 24, 2025, p. 2

BEFORE THE ALASKA BOARD OF FISHERIES
FOR THE 2026 BRISTOL BAY MEETING AT ANCHORAGE

Opposition to Proposals 75, 76, 77, and 78 That Seek To Allow/Expand Permit Stacking

I. No Legitimate Reason Exists For One Fisherman with Two Permits to Fish on One Boat Based On An Economic Factor.

No legitimate reason exists for one fisherman with two permits to fish on one boat based on an economic factor. Alaska statute 16.05.251(i) authorizing an “additional fishing opportunity” for permit stacking was done in part for the purposes of addressing “situations where salmon prices are falling.”¹ Similarly, in 2002, United States Senator Ted Stevens said, “We have a price problem, and the price comes from competition overseas.”² The Alaska constitution and statutes regarding limiting entry variously describe the economic factor in terms of “economic distress,”³ “economic health,”⁴ and “economic dependence.”⁵

The fishery, however, is not now economically distressed. To the contrary, the fishery thrives economically. The exvessel value of the salmon harvest was an estimated \$277 million in 2018, 64% above the 10-year average.⁶ In 2019, the exvessel value was an estimated \$303.5 million.⁷ In 2020, the exvessel value was an estimated \$141.1 million.⁸ In 2021, the exvessel value was an estimated \$260.7 million.⁹ The 2022 Bristol Bay estimated exvessel value amounted to \$343.3 million (99% over the 20-year average).¹⁰ In 2023, the Bristol Bay exvessel value was an estimated \$117.6 million.¹¹ The 2024 exvessel value was an estimated \$128.3 million.¹² In 2025, the Bristol Bay exvessel value was an estimated \$215.3 million—7 percent above the 20 year average of 200.7 million.¹³

Moreover, the estimated gross earning for Bristol Bay drift permits show that the fishery is strong. The top 10% of the permit holders grossed

\$ 7 percent above 20 year average expected (2025)¹⁴
 \$251,818 (2024);
 \$260,209 (2023);
 \$538,240 (2022);
 \$465,564 (2021);
 \$291,453 (2020);
 \$414,204 (2019); and
 \$484,993 (2018).¹⁵

¹ See the comments of Representative Ralph Samuels, the sponsor of HB 251 (AS 16.05.251(i); Legislature (2005-2006) on 4/11/2005 at 8:49:01 AM.

² Anchorage Daily News, February 24, 2002, E-1, “Salmon Solution.”

³ Alaska constitution, Art. VIII Section 15 (limited entry for economic distress)

⁴ AS 16.43.010 (economic health), and AS 16.43.290 (1) (economically healthy).

⁵ AS 16.43.250 (a) (1) (economic dependence)

⁶ 2018 Bristol Bay Area Annual Management Report, No. 19-12, p. 4.

⁷ 2019 Bristol Bay Area Annual Management Report, No. 21-04, p. 5.

⁸ 2020 Bristol Bay Area Annual Management Report, No. 21-16, p. 5.

⁹ 2021 Bristol Bay Area Annual Management Report, No. 22-14, p. 4.

¹⁰ 2022 Bristol Bay Area Annual Management Report, No. , p. 4.

¹¹ 2023 Bristol Bay Area Annual Management Report, No. 24-11, p. 4.

¹² 2024 Bristol Bay Area Annual Management Report, No. 25-17, p. 4.

¹³ 2025 Bristol Bay Salmon Summary, p. 1.

¹⁴ Id. The 2025 CFEC participation and earnings amounts are not available yet.

¹⁵ CFEC, Fishery Statistics, Participation and Earnings, Quartile Tables, Salmon, S03T from 2018-2024.

Each fisherman, based on the cumulative gross earnings for the entire fleet, averaged

\$ 7 percent above 20 year average expected (2025)
 \$110,111 (2024);
 \$105,030 (2023);
 \$218,892 (2022);
 \$188,208 (2021);
 \$120,511 (2020);
 \$173,571 (2019); and
 \$198,555 (2018).

We fish each year for about 3 weeks. Preseason preparation time depends on each person. Even considering fishing and preseason preparation time, there is 10 months left in the year, I believe, for other opportunities. Fishermen can earn more income or vacation in the sun on a beach somewhere with these other opportunities.

Why should fishermen expect a full year's income when we only fish 3 weeks and prepare for 5 weeks when we have 10 months off for other opportunities the rest of the year? Bristol Bay fishing pays well. Extrapolating, the top ten percent would have to gross another \$1,933,200 for those other 10 months from other opportunities to do as well as they do from the opportunity of fishing each year, based on information for the period from 2018-2024.¹⁶ Plus, they would have their fishing income.

Each fisherman in the entire fleet would have to gross another \$796,340 for those other 10 months from other opportunities to do as well as they do from the opportunity of fishing each year.¹⁷ Plus, they would have their fishing income.

It also must be emphasized that exvessel amounts may not include bonuses or price adjustments.¹⁸ Bonuses and price adjustments dramatically increase the exvessel amounts. Those bonuses and price adjustments may be for chilling, bleeding, floating, production, and so forth.

For example, in 2025, bonuses and price adjustments were \$.30 (chilling bonus), \$.05 (bleeding bonus), and \$.20 (price adjustment), totaling \$.55/lb. The 2025 exvessel value used by ADF&G of \$1.03¹⁹ plus 55 cents totals \$1.58/lb. The bonuses/price adjustment increases the exvessel amount by at least one-third.

Proposals talk about high expenses. Business owners know that expenses must be kept low. Over capitalization, however, results in excessive expenses. Half-million and million dollar boats that burn 40-60 gallons of fuel an hour create overcapitalization. Fishermen then want more fish by eliminating other fishermen to pay for their over expenditures.

Fishermen should be careful what they wish for. One corporation owning all the fishing rights is the most efficient economic model. Fish traps are the most economical and safest harvest method. Fishermen aren't actually needed.

However, the White Act protected fishermen from corporate ownership of all fishing rights in 1924.²⁰ Since 1959, the Alaska constitution protects fishermen through its no fish traps, no exclusive fisheries, and common use provisions.²¹ Limited entry must be viewed in the context of other Alaska

¹⁶ This figure was calculated as follows: \$2,706,481 (top 10% totals added together for 2018-2024) divided by 7 years equals \$386,640 (average fishing gross income for 2 months) times 5 (10 months divided by 2) equals \$1,933,200.

¹⁷ This figure was calculated as follows: \$1,114,878 (fleet's cumulative gross added together for 2018-2024) divided by 7 years equals \$159,268 (average fishing gross income for 2 months) times 5 (10 months divided by 2) equals \$796,340.

¹⁸ 2025 BB Salmon Season Summary, ("Prices may not included incentives for icing, bleeding, floating or production bonuses."), p. 1

¹⁹ Id., Table 4, p. 5.

²⁰ Laws and Regulations for Protection of Fisheries of Alaska (Washington DC, Commerce Department, 1924, p. 9.

²¹ Alaska Const., Ord. 3 (fish trap ban), Art. VIII Sec.15 (no exclusive fisheries and limited entry), and Sec. 3 (common use).

constitutional provisions that protect all fishermen, current and future, from placing a public resource in the hands of too few.

The 2004 Optimum Number Report notably provided: “If future economic returns in the fishery were expected to vary as economic returns varied over the entire 1983-2003 time period, the economic optimum number of permits would likely remain near current permit levels [1,857].”²² Except for this forecast, as with weather forecasts sometimes, the Report’s other forecasts were wrong.

No legitimate economic reason exists for a single fisherman to fish with two permits on one boat. There is no economic distress in the fishery now. Indeed, the economic factor supports eliminating dual permit ownership and returning to a single fisherman fishing with one permit on one boat.

II. The Conservation Factor Fails to Justify a Dual Permit Operation for One Person on One Boat.

The conservation factor fails to justify a dual permit operation for one person on one boat for the purpose of reducing the amount of gear in the water. The Alaska constitution and statutes regarding limiting entry variously describe the conservation factor in terms of “resource conservation,”²³ “conservation,” “allowable commercial take of the fishery resource,” and so forth. The Bristol Bay salmon runs are strong:

2015	59.1 million ²⁴
2016	51.7 million ²⁵
2017	57. million ²⁶
2018	63 million (record) ²⁷
2019	56.4 million. ²⁸
2020	58.3 million fish ²⁹
2021	67.7 million (record) ³⁰
2022	79.1 million (record) ³¹
2023	54.5 million ³²
2024	51.6 million ³³
2025	56.7 million ³⁴

By contrast, in 1973, the Bristol Bay run totaled 2.5 million.³⁵ Limited entry was enacted in 1973.

The salmon runs now do not support having a single fisherman with two permits on one boat. The salmon runs support a return to a single fisherman with one permit on one boat.

²² Bristol Bay Salmon Drift Gillnet Fishery Optimum Number Report, Executive Summary, CFEC Report 04-34, October 2004, at p. 6.

²³ Alaska constitution, Art. VIII Section 15 (resource conservation); AS 16.43.010 (a) (conservation); and AS 16.43.290 (2) (allowable commercial take of the fishery resource).

²⁴ 2015 Bristol Bay Area Annual Management Report, No. 16-13, p. 5.

²⁵ 2016 Bristol Bay Area Annual Management Report, No. 17-27, p. 4.

²⁶ 2017 Bristol Bay Area Annual Management Report, No. 18-11, p. 4.

²⁷ 2018 Bristol Bay Area Annual Management Report, No. 19-12, p. 4.

²⁸ 2019 Bristol Bay Area Annual Management Report, No. 21-04, p. 5.

²⁹ 2020 Bristol Bay Area Annual Management Report, No. 21-16, p. 5.

³⁰ 2021 Bristol Bay Area Annual Management Report, No. 22-14, p. 4.

³¹ 2022 Bristol Bay Area Annual Management Report, No. 23-08, p. 4.

³² 2023 Bristol Bay Area Annual Management Report, No. 24-11, p. 5.

³³ 2024 Bristol Bay Area Annual Management Report, No. 25-17, p. 4.

³⁴ 2025 Bristol Bay Salmon Season Summary (September 24, 2025), p. 1.

³⁵ Krasnowski and Randall, ADF&G Technical Data Report No. 22, Bristol Bay Sockeye Salmon 1973, p. 3.

III. Dual Permit Operations Largely Favor the “Well to Do” At the Expense of Poorer Fishers and Local Watershed Communities

Dual permit operations largely favor the “well to do” over the less affluent and local watershed communities. A huge flaw with dual permit operations is that the real determining factor is how “rich” you are.³⁶ The acquisition of a permit is not based on how much a fisher and local communities depend on the fishery, or other alternative jobs one has in the his/her region (AS 16.43.290(3)).

Sure a few local residents have obtained permits at exorbitant prices. A lot more locals, however, would love to fish but cannot afford to buy a permit and boat. Men/women from watershed villages should not have to sit on the beach while they watch boats owned by non-local fishermen fish in front of their villages.

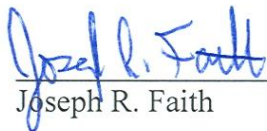
Dual permit operations are more realistically a devise that allocates the resource away from the small and poorer fishers, thereby creating serious economic impacts on local communities.

Past experience with permit stacking for setnetters bears this out. According to the CFEC, “... when permit stacking was allowed, the fair market value of set gillnet permits rose 64.2% from \$25,700 to \$42,200.”³⁷ New entrants into the set net fishery “went to a historic low of 6% in 2011.”³⁸ Permit stacking largely benefited non-residents and nonlocals, *not* local watershed residents. “Starting in 2010, when permit stacking regulations came into effect, the count of individuals who held two permits at year-end rose substantially, especially among nonresidents and nonlocals.”³⁹ In 2012, ninety-two non-residents and nonlocals stacked permits, while only thirteen locals stacked them.⁴⁰

Similar results occurred in the drift fishery with dual permit operations. Dual permit percent of earnings over single permit operations were either more than double or nearly double from 2018 to 2021.⁴¹ Prior to dual permits, 25.4% of all new entrants were locals and 49.3% were non-resident in 2002. After dual permits were put in place, new entrants were 6.6% local and 60.1% non-resident in 2021.⁴² Further, from 2018 to 2021, the dual operations count for both local permit holders went from 33 to 25, both nonlocal 57 to 81, and both nonresident from 232 to 238.⁴³

Additionally, the Bristol Bay Economic Development Corporation (BBEDC) does a lot for local residents, more than one thinks. It, however, still comes up short with the difficult task of helping Bristol Bay residents obtain permits and boats. Hopefully, BBDEC will find creative ways to help local residents enter the drift and setnet fisheries.

Finally, I’ve lived at Dillingham since 1992. I’ve drift fished predominantly the Nushagak district for over two decades. I’ve largely fished single permit operations but have twice fished dual permit operations. I am submitting this comment in my capacity as an individual commercial fisherman only. I thank you for your time and consideration.


Joseph R. Faith

³⁶ S03T Drift permits \$156,300 (Nov. 2025); S04T Set net permit \$62,900 (Nov. 2025) CFEC website, Permit Values.

³⁷ CFEC Report No. 12-02-N, Bristol Bay Set Gillnet Permit Stacking, at page 15, November 2012.

³⁸ *Id.*, at page 13.

³⁹ *Id.*, at page 5.

⁴⁰ *Id.*, Table 1, at page 5.

⁴¹ CFEC Bristol Bay Salmon Fisheries, 1975-2021, November 2022, Reid Johnson and Brad Robbins, Table 1-7, Earnings by Vessel and Operation Type 2004-2021, p. 11.

⁴² *Id.*, at p. 8.

⁴³ *Id.* at p. 15.

Submitted by: Trever Flathman

Community of Residence: Manatee county

I am a Bristol Bay commercial fisherman writing to oppose Proposals 44 and 61–68.

The Nushagak District King Salmon Stock of Concern Management Plan was adopted by the Board of Fisheries in March 2023 after an extensive stakeholder process. That plan has not yet been in place long enough to evaluate its effectiveness over a full Chinook generation, and restructuring it now would be premature.

These proposals would substantially alter the existing management framework, reduce management flexibility, and create unnecessary risk to the commercial sockeye fishery. As noted, the impacts could be severe — including the potential loss of millions of sockeye salmon harvested by the fleet, with no demonstrated biological necessity to justify such drastic changes at this time. For example, Proposal 61 could delay the opening of the sockeye fishery until June 28, resulting in significant economic harm to fishermen, processors, and local communities.

The current plan already provides tools to conserve Chinook salmon while allowing managers to respond in real time to run timing, abundance, and in-season information. Changing the structure of the plan now would effectively reset the clock, undermine one of the most thorough stakeholder processes the Board has undertaken, and limit the Department's ability to manage adaptively.

I respectfully urge the Board of Fisheries to reject Proposals 44 and 61–68 and allow the existing Nushagak King Salmon Stock of Concern Management Plan to remain unchanged until it can be properly evaluated with sufficient data.

Krystal Foote
Permit Holder: SN 60872



BOF Bristol Bay Finfish – January 2026 Meeting - Public Comments

Support Proposal 45 - *Extend the registration/reregistration deadline in the Naknek-Kvichak District from July 17 to July 22.*

Comment:

As a third-generation permit holder fishing Naknek-Kvichak, I support extending the registration dates because sockeye salmon are consistently peaking later in July, and this adjustment helps ensure better escapement and fair access for all gear types.

Support Proposal 46 - *Amend the Sockeye Salmon Fisheries Management & Allocation Plan in the Naknek-Kvichak District to align allocation dates with the extended season.*

Comment:

I support adjusting the management dates to match later returns, which helps commercial fishers plan and fish sustainably while giving runs a better chance to meet escapement goals.

Support Proposal 48 - *Modify the Kvichak River Sockeye Salmon Special Harvest Area (KRSHA) by adjusting the ratio of drift gillnet to set gillnet openings and reducing the gear removal distance offshore.*

Comment:

I support proposal 48; modern fleets and participation patterns differ from when the old ratios were written. This change recognizes that drift and set gear need more balanced opportunity in the KRSHA so that all commercial fishermen can make a season.

Support Proposal 49 - *Revise the KRSHA management plan to create a dynamic ratio of drift to set fishing periods based on recent permit participation.*

Comment:

I support proposal 49; rather than a rigid 3:1 ratio, a dynamic system that responds to actual participation gives a fair shot to set and drift vessels alike and better reflects how Bristol Bay fishing fleets currently operate.

Support Proposal 50 - *Amend the Bristol Bay commercial salmon management plan to explicitly include fish quality and economic value as objectives alongside escapement and allocation.*

Comment:

I support proposal 50 because the quality of harvested salmon directly affects market demand and price, which is critical to keeping our fishery strong year after year. Including product value and waste

reduction in the management plan helps ensure Bristol Bay salmon stay premium and supports long-term economic sustainability for commercial fishermen.

Oppose Proposal 61 — *Increase Early-Season Restrictions to Protect Nushagak King Salmon*

Comment:

As a third-generation commercial fisherman and permit holder in Bristol Bay, I oppose Proposal 61 because it removes essential in-season management flexibility and imposes rigid closures and sport retention bans that are not supported by clear evidence of conservation benefit, while placing a disproportionate burden on the commercial fleet. The existing management plan already provides tools to protect king salmon, and this proposal unnecessarily sacrifices livelihoods without addressing the full range of factors affecting king returns.

Oppose Proposal 62 — *Delay Commercial Fishing to Protect Early-Run Nushagak King Salmon*

Comment:

I oppose Proposal 62 because a blanket prohibition on all commercial fishing prior to June 28 or until 55,000 kings pass sonar ignores real-time run timing variability and would severely harm permit holders and processors without guaranteeing improved escapement. As a third-generation fisherman, I support conservation, but management should remain responsive and data-driven rather than based on fixed dates and assumptions that oversimplify a complex system.

Oppose Proposal 71 — *Reestablish General District (late season option)*

Comment:

As a third-generation fisherman, I oppose Proposal 71 because reopening a General District late in the season increases the risk of mixed-stock interception and weak-stock impacts without solving the underlying enforcement problem. Boundary violations should be addressed through enforcement and management, not by expanding fishing areas in ways that could harm conservation and long-term sustainability.

Oppose Proposal 72 — *Expand Eastside boundaries into Late Season Harvest Area*

Comment:

I oppose Proposal 72 because expanding district boundaries into the LSHA creates a higher risk of coho, chum, and Chinook bycatch and shifts management risk onto the resource in exchange for short-term operational convenience. As a permit holder, I believe conservation and clear stock separation must come before late-season access.

Oppose Proposal 73 — *Open all gear groups in a General District late season*

Comment:

I oppose Proposal 73 because opening a fleet-wide General District late in the season increases

competition, interception, and conflict without addressing enforcement gaps or conservation concerns. This proposal trades orderly management for short-term access and risks long-term harm to both stocks and fishermen.

Oppose Proposal 74 — *Mandatory General District once escapement goals are met*

Comment:

I oppose Proposal 74 because automatically reverting to a General District removes the department's ability to manage adaptively and protect weaker stocks late in the season. Enforcement challenges should not be solved by weakening stock protections and expanding fishing areas.

Oppose Proposal 75 — *Permit stacking (single owner, two permits, 200 fathoms)*

Comment:

I oppose Proposal 75 because allowing permit stacking concentrates access and wealth into fewer hands and raises barriers for young and new fishermen trying to enter the fishery. The long-term health of Bristol Bay depends on maintaining broad participation, not accelerating consolidation.

Oppose Proposal 76 — *Permit stacking with broad fleet support claim*

Comment:

I oppose Proposal 76 because further consolidation through stacking risks undermining community-based participation and could permanently change the character of the fishery. Economic downturns should be addressed through market and policy solutions, not structural changes that favor capital over people.

Oppose Proposal 77 — *Creation of permanent "E" consolidated permits*

Comment:

I oppose Proposal 77 because creating permanent consolidated "E" permits would lock in consolidation and remove flexibility for future generations, making it harder for local and young fishermen to enter the fishery. Permanent structural changes should not be made in response to temporary economic cycles.

Oppose Proposal 78 — *Permit stacking plus reduced CFEC penalty treatment*

Comment:

I oppose Proposal 78 because it not only promotes consolidation but also weakens accountability by reducing regulatory consequences for stacked permits. Conservation and compliance should be strengthened, not relaxed, especially as pressure on the resource increases.

Support Proposal 81 — *A case study for alternative harvesting methods in Bristol Bay*

Comment:

I support Proposal 81 because it creates a controlled opportunity to evaluate alternative gear that may improve salmon quality, reduce impacts on Chinook and other stocks of concern, and potentially

establish a market premium for Bristol Bay salmon. The temporary, research-oriented nature of this proposal is exactly the kind of adaptive management we need to remain both ecologically responsible and economically viable in a rapidly changing seafood industry.

Submitted by: Avi Friedman

Ekuk Beach Fisherman's Association

Community of Residence: Baltimore, Maryland

Avi J. Friedman writing, I'm a set-net fisherman on Ekuk Beach in the Nushagak District of Bristol Bay since 1986 (39 seasons so far, with only one way to quit). I am a member of the Ekuk Beach Fishermen's Association. Since the 1990's I have been bringing salmon home to Baltimore to sell myself. I have 800+ devoted customers who realize that the salmon they buy from me is the best they can get. Don't ever think that non-residents can't or don't support Alaska - I know of over 20 families (customers) who have traveled to Alaska (and spent money in Alaska) because they wanted to learn more about where their salmon comes from.

I worked for ADF+G for the better part of 7 years before starting commercial fishing.

I support allowing the Nushagak Chinook Management Plan to work without preemptive alterations. This is common sense to me - a decision was made to change Chinook management experimentally in an effort to increase Chinook escapement. It makes no sense to trash a reasonable program before its time is up. That would be a waste. We're talking about the 7-year Chinook life cycle.

I support Proposal 56, which would make Ekuk's coordinate-based offshore set-net boundary permanent. Permanence will add stability to the rules government commercial fishing in Bristol Bay.

I also support Proposal 57: Orderly and Safe Fishing. I have no issue with Drift Fishing whatsoever. But the FACT is that every year, a certain few drift fishermen drive their boats at absolute top speed directly over our set net gear, and cause damage such as broken ground lines, which causes lost fishing time. This is simply extremely rude behavior and should be outlawed. There is no need whatsoever for a drift boat to run at top speed directly over a set net site's gear. The drifter's say "we run over our own line all the time and we never have an issue." Of course - because they're running over their own gear at idle speed. When they run over set net gear they are running at absolute top speed, and they break our ground lines because there is no time for our ground lines to adapt to the increased pressure. This is extremely rude behavior and needs to be made illegal right now. Gear destruction of another fisherman is, or should be, made illegal. Drift boats have the entire Bay to travel wherever they want - there is no reason for them to drive over set net gear. I cannot argue this strongly enough.

I also support Proposal 80: Joint-Venture Set Net Operations. This seems reasonable to me, in an effort to help set net families become more coordinated in their operations.

Re Economic and Community Impacts of Missed Allocation - I feel very strongly about this, that our Board-adopted 26% set-net allocation be adhered to. What is the purpose of a law that is not adhered to by the very Agency that made the law? This does not at all instill faith in our salmon management system! This directly hurts the Nushagak Bay/Ekuk Beach set net fishermen and their families, due to lost fishing time and obviously lost income.

Together these requests are steps toward more equitable harvest share in practice, not just theoretically on paper. Allowing the Chinook Management Plan to complete at least one full life cycle of Chinook salmon before considering alterations and changes to the Plan will encourage participation and trust in future conservation management.

Proposals 56 and 57 will reduce conflict and safety risks that disproportionately affect on-shore set net fishermen, due to the VERY RUDE BEHAVIOR of a small group of drift boat fishermen. I emphasize that I have nothing at all against drift fishing, there is plenty of room for everyone. It's just a few that cause a lot of damage to set net gear as a result of their very rude behavior which needs to be made illegal.

Proposal 80 will provide some limited flexibility for small set net operations to become more efficient.

I wish to thank the Board and all who read this for the opportunity to express my thoughts on these very important issues which will greatly affect Ekuk Beach set net fishermen. Thanks for the opportunity to contribute.

Avi J. Friedman

Ekuk Beach, Nushagak District

Alaska Board of Fisheries – Bristol Bay Finfish Meeting

Madam Chair and Members of the Board,

My name is **Celia Friedman**, and I am a family member fishing on Ekuk Beach in the Nushagak District. I submit this comment as a member of the Ekuk Beach Fishermen's Association (EBFA) and as someone whose livelihood and family depend on a safe, fair, and sustainable Bristol Bay fishery.

I have been fishing with my mom and dad since I was 10 months old. I spent my summers growing up on Ekuk Beach, I love it and I want to see our lifestyle protected for generations to come.

I want to strongly express my support for Proposals 56 and 57. Every season we see boats running over our gear. Every season we see gear broken from boats. It doesn't matter the type of boat, prop or jet, our gear is under so much tension that boats coming into contact with it risks it breaking. When our gear breaks we miss out on anywhere from a day to multiple weeks of fishing depending on where the site is located/how low the tide gets and when. These proposals are important to protect set-net gear and the limited amount of time we have to fish during the season.

Allow the Nushagak Chinook Management Plan to Complete a Full Life Cycle

I support allowing the Nushagak Chinook Management Plan to work without preemptive alterations. Chinook are long-lived fish with a life cycle of seven years, and meaningful evaluation of conservation outcomes requires time and consistency. This plan was developed through a multi-year, Board-convened stakeholder process and adopted unanimously in 2023. Re-setting management in the middle of the Chinook life cycle creates instability for fishing families and undermines the ability to evaluate whether the plan is working.

Support for Proposal 56: Predictable Spatial Boundaries

I support Proposal 56, which would make Ekuk's coordinate-based offshore set-net boundary permanent. Adopted by the Board in 2022, this boundary has been working successfully as a clear, predictable, and enforceable seaward limit. Making it permanent provides certainty for set-net placement, drift operations, and enforcement in a high-density fishing area.

Support for Proposal 57: Orderly and Safe Fishing

I support Proposal 57, which establishes the same boundary as a shoreward limit for drift gear and prohibits contact with set-net gear. This proposal reduces entanglement risk, gear loss, and unsafe nearshore interactions by clearly defining spatial limits and updating set-net gear definitions. As the drift fleet has grown significantly in size and horsepower, these clear, enforceable rules are essential to maintaining an orderly and safe fishery.

Support for Proposal 80: Joint-Venture Set-Net Operations

I support Proposal 80, which allows limited joint-venture set-net operations under defined conditions. Joint ventures help small, family-based sites adapt to short openings, rising

costs, and safety challenges without increasing fishing footprint or promoting consolidation. This approach has worked successfully in Kodiak set-net fisheries for over four decades.

Economic and Community Impacts of Missed Allocation

In recent years, set-net fishermen in the Nushagak District have consistently fallen far short of the Board-adopted 26% set-net allocation. These shortfalls, in harvest share and time, have real consequences for fishing families, local processing, and watershed communities like Ekuk. When allocation exists on paper but is not achieved in practice year after year, the economic and social fabric of Bristol Bay communities is weakened.

Together, these requests are important steps toward equitable harvest share in practice, not just on paper. Allowing the Chinook Management Plan to complete at least a full life cycle before considering alterations to the plan encourages participation and trust in conservation management; Proposals 56 and 57 reduce conflict and safety risks that disproportionately impact onshore set-net fishermen; and Proposal 80 provides limited flexibility for small operations to adapt to shortened and more complex fishing opportunities. These measures help ensure that set-net fishermen in the Nushagak District have a fairer opportunity to sustain our fishing families and watershed communities over the long term.

Thank you for your consideration and for your service to Alaska's fisheries and fishing communities.

Respectfully submitted,

Celia Friedman

Ekuk Beach, Nushagak District

Submitted by: Luke Gardner

Community of Residence: Naselle Wa

Prop 45) this is a really good idea, drop card do a shakedown day or so, unregister, address unforeseen issues on a 48h off and start season on a fresh slate... genius, why not? Sure beats transferring three times while at port fixing shakedown discoveries.

Prop) 52 I'm obviously in support of this, as I wrote it. Please correct h)1)C) to read "No part of a set gillnet may be set or operated more than 500' seaward of the 18' high water mark."

Prop 61,62,63) All the same comment;

I am against these proposals. The table cited at the end of proposal 62 shows the historical vested interest in the allowable harvest of kingsalmon in the Nush. The table is broke into five distinct harvester categories. Phylisopically I disagree with how these categories are divided, but I'll save that for later. The categories as listed are commercial, sport above sonar, sport below sonar, subsistence below sonar and sub above sonar. I find it interesting that while the commercial harvest has plummeted in recent years (by percentage of historical average) found at the bottom of the table, sport harvest has continued to rise in recent times (by percentage of historical average). The historical average listed there is 58,515 King commercial harvest, and 4,031 King sport harvest. This is a historically accurate record of these harvesters vested interest in King harvest. Just the facts. In 2022, per that chart, commercial harvest was 5,431 Kings, which is less than 1/10th of the 58,515 fish historical average that represents the commercial harvesters vested interest. That's a reduction of 90%ish

Whereas, per that chart the sport harvest in 2022 was 5,298 kings which is 31% higher than the 4,031 fish historical average. So in 2022 while one harvest group has harvested only 10ish % of its historically vested harvest, the other harvester group has harvested at a rate of 130ish% of its historically vested harvest.

While I recognize a dead fish is a dead fish regardless of its harvesters identity, and I recognize that it is a fact that in 2022 the commercial harvester was indeed 133 fish more than the sport harvest, I also recognize that pointing out that the commercial harvest was larger than the sport harvest in 2022 entirely ignores a handfull of important details.

One of which is, vested interest as a percentage of the allowable harvest total.

Speaking in terms of harvest percentages of allowable harvest and vested interest that establish those percentages is quite familiar and some may say 'customary' in Bristol Bay. Allocation is the term we use to encompass the concept. These proposals ignore the fact that this very chart cited in one of them clearly shows that 4/5 of the historical vested interest in the total allowable harvest has been vested by the commercial harvesters. 14% was harvested by subsistence, and shy of 6% was harvested by sport harvest. These are just the facts, of what has happened in black and white, on paper, historical data sets found in the chart cited. These proposals do not represent the vested harvester groups in an historically equitable manner. And therefore the board should not approve these proposals, for that reason alone.

Beyond that I find it quite interesting that the constant (or near to) is the subsistence harvest. Calculated from that chart, 2022 sub harvest was 97% of its historical average. And the 2012-2021 average sub harvest was 115% of the subsistence's historical average... pretty stable and consistent considering all worldly factors of change since 1966.

This is where I think it's important to re-evaluate everything to its core and return this conversation to something I mentioned in the beginning of this comment. Harvester group identity. As previously identified the chart cited (for the above figures) has five identities of harvesters listed. Let's for simplicity of discussion narrow that to 3 listed groups, commercial, sport and subsistence or 'sub' for efficiency. These 'identities' are misleading and need re-evaluated if the totality of this king shortage is going to be equitably rationalized in a time and tradition honored moral manner. It's my view that the sub harvest is sacred and should be the very last straw drawn regarding conservation restrictions. Whereas commercial is at the other end of the spectrum to sub harvest. Those two identities fit their 'identity' while one is purely operating in commerce, the other is void of that aspect of commerce. It's no accident that commercial fishing got its name from the simple fact that it specifically implies - operating in commerce.

Here is where the re-evaluating needs to begin, sport fishing harvest needs to be bifurcated. One part of it is private regarding an individual using his equipment angling for food, with no exchange of money for guide or transport or service provider. This angler is not operating in commerce. He/she is fishing for dinner and/or recreation. Then there is the guided, supplied, transported, angler contracting with providers to facilitate the harvest of fish. Contracting in this manner is operating in commerce. Until this is addressed, resolve to this king matter will be daunting.

The private sports angler is or is very much akin to the subsistence fisher, whereas the contracting guided angler and their guides are operating in commerce and are akin to commercial harvesters.

Commercial harvesters have had zero intentional harvest of Nush kings for over a decade, it's time commercial/sport category share that responsibility in an equitable manner. Mortality while targeting other species for both those groups should be the focus and it should be divided in a time honored vested manner

PC78

Submitted by: Aristotelis Georgakopoulos

Community of Residence: Seattle

I oppose prop 44 and 61-69. These new regulations will drastically alter the ability for tim sands to meet the escapement goals for the nushugak district. This will wildly over escape the watershed and will cause irreparable damage to the mighty nushugak sockeye run. Not only will the fishing fleet suffer, the amount of tax revenue for the borough will drop dramatically. These propositions hurt the bay as a whole. Lets all stand together and aim for a maximum sustainable harvest of our beautiful and precious resources, for generations to come.

**Submitted by Darin Gilman
Cordova, Alaska**

Proposal 44- Oppose

Proposal 61- Oppose

Proposal 62- Oppose

Proposal 63- Oppose

Proposal 64- Oppose

Proposal 65- Oppose

Proposal 66 -Support

Proposal 67- Support

Proposal 68- Oppose, the sustainable escapement goal does account for fish size and fecundity. Instead of creating an OEG for King Salmon, ADFG should be allocated the resources to have stream surveys post sonar to correlate the data. By allowing ADFG additional resources it would create a complete picture of the King Salmon run, versus comparing recent commercial catch data being compared to historical commercial catch data. This is like comparing apples and oranges with all the restrictions that have been implemented on the commercial fleet. Sonar counting variability due to large sockeye runs is a challenging issue, but ADFG has historically erred on the side of cautious management when there is missing information.

Submitted by: Thomas Glass

Community of Residence: Dillingham, AK

Proposal 57

I strongly disagree with this proposal.

I am writing to express concern regarding the proposed new regulations for the Ekuk and Bluffs area. While I understand the need to prevent gear conflicts, I believe the proposal may be unnecessarily restrictive for the majority of responsible drift net fishermen.

Currently, regulations effectively separate set net and drift net gear. The existing rules, combined with practical self-interest, already create a strong incentive for drift fishermen to avoid set net areas. Entangling gear results in significant damage, loss of valuable fishing time, and risk of beaching. Most occasional entanglements are due to severe weather or, in rare cases, by individuals who knowingly disregard the rules—individuals who are unlikely to be deterred by new regulations.

It seems unfair to penalize the entire drift fleet by eliminating an established and historically productive drift. I learned the "Bluff drift" as a deckhand out of Dillingham in 1989, and it remains a major part of my summer fishing activities. In my long experience, and I believe that of most drift fishermen, this drift can be and is executed routinely without interaction with set nets.

Furthermore, the current system allows for flexible use of the area. There are many times when set net fishermen are not actively fishing. Under existing rules, drift nets may be legally deployed there, provided all distance requirements from any in-water gear are maintained. This existing flexibility is a reasonable balance that the new proposal would eliminate.

For these reasons, I disagree with the proposal. Thank you for the opportunity to comment.

Boards Support note: this comment submission was received as comments in the full proposal book and the proposal text was removed to focus on the substantive comments.

Submitted by: Kyle Gleason
The United States of America

PROPOSAL 45

I believe Biologists should have the right to extend the free transfer date, but it should not be forcibly extended to the 22nd.

PROPOSAL 46

Same as my response to proposal #45.

**

PROPOSAL 47

Same as my response to proposal #45.

**

PROPOSAL 48

The idea that drift and set openers are to be managed by a ration is a difficult ask for the managing biologist. I'm not in support of this.

**

PROPOSAL 49

Same response as proposal #48.

**

PROPOSAL 50

I agree with the intent of this poorly worded proposal.

**

PROPOSAL 51

This proposal makes sense. Having to drop gear off to a tender to fish a special harvest area is a complicated mess. Bagging it and holding it aboard is more reasonable. I support this proposal.

**

PROPOSAL 52

I support this proposal. It sets out to solve a problem I didn't know existed. I don't see a problem with giving the biologist more tools to maximize harvest when escapement is strong.

**

PROPOSAL 53

This misses the mark that is more accurately addressed in the open district proposals later on. I am against this.

**

PROPOSAL 54

I support this proposal.

** PROPOSAL 55

If I'm reading this correctly, it is the same intent as proposal #54.

** PROPOSAL 56

With sea level change, this proposal while trying to establish clarity may have unintended consequences, potentially allowing setnets to operation well away from shore. I think this needs to be further discussed before I can support this. Not in support.

** PROPOSAL 57

I do not support this. This essentially makes a setnet exclusive area regardless of setnets being in the water or not. This area is a concentrator and setnetters are trying to make this a setnet only area. I do not support this proposal.

**

PROPOSAL 58

I'm not sure I understand this proposal's impact.

** PROPOSAL 59

I'm neutral on this one. The wood river special harvest area is a tool that allows for additional harvest when the Nush is behind. It also allows for allocation adjustment. I don't mind letting setnetters to catch up using this tool.

** PROPOSAL 60

Neutral on this one.

**

PROPOSAL 61

We need to develop an accurate way to count King Salmon first before we make any more regulation that rely on scanty information. I do not support this proposal. Nor should non biologists be making regulatory decisions that may affect the future of the King Salmon.

** PROPOSAL 62

We need to develop an accurate way to count King Salmon first before we make any more regulation that relies on scanty information. I do not support this proposal. Once again, let the biologists do their job.

** PROPOSAL 63

This is a step in the right direction. More accurate data is needed to properly manage kings in this system. If our biologists support this I support this proposal.

** PROPOSAL 64

I agree with the logic of this proposal.

** PROPOSAL 65

1st, king salmon counting needs to more accurate. 2nd, Ekuk setnetters use trucks to drag their nets onto the beach. When the Wood river opens, Ekuk setnetters are not equipped to fish that area. I understand that this puts them at a disadvantage, but I don't think we should be catering to this group. I oppose this proposal.

**

PROPOSAL 67

Again, we need accurate counting first. I oppose.

** PROPOSAL 68

Accurate counting first. I oppose.

** PROPOSAL 69

Without accurate counting, we cannot make rules like this. I oppose. We need our biologists to lead here.

**

PROPOSAL 70

The Ugashik folks suffer. I think they should be moved further west on that boundary.

** PROPOSAL 71

I strongly support this. Late season once all rivers have met escapement goals there is no need for boundaries that confine fishermen to districts and incentives fishermen to fish illegally. There is no reason to continue to restrict fishermen to these small areas. It creates conflict and encourages illegal fishing. By adopting a general district like this also eliminates the need to enforce those boundaries. This is way past due.

** PROPOSAL 72

This is another good approach to the general district as proposed in #72. I support a general district.

** PROPOSAL 73

This proposal has good intent. I think the prior two proposal have better language and address the same issue.

** PROPOSAL 74

I support this proposal.

**

PROPOSAL 75

Permit stacking has many benefits. I strongly support this.

** PROPOSAL 76

I support this proposal.

**

PROPOSAL 77

I don't see this as necessary if permit stacking is allowed.

** PROPOSAL 78

Long winded pitch for permit stacking.

** PROPOSAL 79

No opinion on this gear type in this area.

** PROPOSAL 80

5 AAC 06.331. Gillnet specifications and operations.

This is a departure from the intent of owner-operator, essentially allowing a setnet permit owner to lease their permit to another and not be present. I do not support this proposal.

** PROPOSAL 81

Beach seins? I'd like to know more.

PROPOSAL 82

The 32' limit restriction is antiquated and questionable in its original intent. I would like to see the length limit removed. While this has good intent, it's not addressing the root issue.

** PROPOSAL 83

I support this.

**

PROPOSAL 84

Proposal 83 is better.

** PROPOSAL 85

Remove the limit.

**

PROPOSAL 86

Remove the limit.

** PROPOSAL 87

Remove the limit, not just the rule that affects your boat.

Submitted by: Michael Hafer

Community of Residence: Snohomish, WA

I support proposal 102 as it encourages conservation of native fish and preserves their vital return within the ecosystem. It responsibly allows for the targeting of sockeye salmon by the sport fisherman and protects the fragile king salmon population. Further it incentivizes me to travel to Alaska and spend my recreational time and dollars with local communities outside of mainstream tourism.

I respectfully request the board to enact proposal 102. Thank you.

Submitted by: Christopher Hager

Bristol Maps

Community of Residence: Bothell, Wa

I am writing to strongly oppose proposals 44 and 61-68. These proposals all serve to remove control and power from the local biologists and community members that have done an exceedingly great job of managing a fishery under difficult circumstances. I fully appreciate that King Salmon need to be preserved and the existing BOF plans are already working towards that goal. Further removing the power from the Biologists will only further politicize the issue and remove science and control from the experts on the issue.

Prop 82-84: I am also writing to strongly support Drift vessel length modifications. The 32ft limit has been proven to be ineffective of creating an equitable fishery for all members. New vessels are over twice the displacement of average vessels when this regulation was last modified. It is now only a limit on safety and efficiency. Larger vessels would provide a safer and more efficient platform. Less fuel is burned on longer vessels and they would also provide a better platform for direct marketing a vessels catch directly to consumers.

Submitted by: Alan Hed

Togiak River lodge

Community of Residence: Oregon

I have fished the togiak river for over 15 years. I fished this when the king salmon run was extraordinary. I watched the run decline year after year and support, under current conditions, the no bait (particularly "eggs" before July 11 (agree with togiak river lodge to move this up to 11th as they use shrimp to target sockeye.

The new owners of togiak river lodge have taken extra steps to protect for future generations. Even though "eggs" were allowed last year, the lodge has implemented a policy to not use eggs. They have also shifted there business model to "spade" fishing with 90% catch and release during the peak season (June -July 1)

The request to move "bait allowed" up by 5 days is not to target kings but sockeye .

I also agree with the shift of the deadline proposed by togiak river lodge as they do not fish above these restricted areas and respect the spawning areas by salmon moving up river.

The new owners are guardians for the salmon and they would not recommend a change if it effected negatively the future of the salmon on the river . They are going owners and know their future livelihoods depend on a healthy return year after year.

If the rules proposed by togiak help their business by helping sockeye retention and protects the king salmon run the Alaska Department of Fish and Game should deploy support this change as the success of togiak river lodge has and will continue to have a significant positive impact on the health of our salmon.

Alan Hed

PC85

Submitted by: Dave Hendrie

Community of Residence: Oregon

I strongly support proposition 102. The majority of salmon spawning occurs above the Pongo River. By moving the line to the Pongo, Law enforcement will more easily be able to enforce the line. No lodges operate above the confluence making this location an ideal cutoff,

PC86

Submitted by: Adam Hess

Community of Residence: Meridian Idaho

I am writing to express my support for the Togiak River Lodge, a place we deeply cherish and value. The owners, Jordan and Zach Larsen, have demonstrated exceptional stewardship of the land and fisheries in this region. Their commitment to the health of the fish populations and the long-term sustainability of the fishery is evident in the way they operate and care for this resource.

With this in mind, I respectfully ask that you consider the proposed regulation changes:

(1) to allow the use of bait on the Togiak River beginning July 11, rather than July 16, in order to responsibly target sockeye salmon a few days earlier; and

(2) to adjust the upper boundary for targeting king salmon from the Geciak River to the Pongo River.

These changes would support responsible access to the fishery while maintaining the focus on conservation that the Larsen family and many of us who enjoy the Togiak work hard to uphold.

Thank you for your consideration.

PC87

Submitted by: Walt Hess

Community of Residence: Twin Falls Idaho

I am writing to voice my appreciation for the Togiak River Lodge, a place that holds great meaning for many of us. Its owners, Jordan and Zach Larsen, have consistently shown a deep respect for the land and

the fisheries, managing both with a strong focus on conservation and long-term sustainability. Their actions reflect a genuine commitment to protecting the fishery for future generations.

In light of their responsible stewardship, I ask that you give thoughtful consideration to the proposed regulation updates. Specifically, I support opening the use of bait on the Togiak River on July 11, five days earlier than the current date, to allow anglers to access the sockeye run in a timely yet sustainable manner. I also support shifting the upper boundary for king salmon harvest from the Geciak River to the Pongo River, which would better align with how the fishery is used and managed.

These adjustments would enhance angler opportunity while remaining consistent with conservation goals that both the lodge and its supporters strongly value.

Thank you for taking these recommendations into account.

PC88

Submitted by: Tara Hines

FV Attie Mae - Bristol Bay Drift Gillnet Vessel and Permit Holder

Community of Residence: Montana

Dear Members of the Alaska Board of Fisheries,

My name is Tara Hines, I am an owner of a Bristol Bay drift permit and captain of a drift gill net vessel FV Attie Mae. As a third generation commercial fisherman I understand the importance of protecting Alaska's valuable salmon resources and fisherman's way of life. I am submitting written testimony regarding the following proposals.

I oppose Proposals 44 and 61–68 to the extent that they would modify the Nushagak District King Salmon Stock of Concern Management Plan.

Further restricting sockeye salmon harvest could have negative long term effects on sockeye returns without any proof of increased returns for Chinook salmon.

Available analyses indicate the current plan is functioning as intended by delaying commercial openings, reducing fishing time during peak Chinook vulnerability, reducing exploitation of king salmon in the commercial fishery, and increasing escapement prior to harvest exposure.

I respectfully request the Board allow the plan to remain unchanged and be evaluated over a full Chinook generation.

Sincerely,

Tara Hines

Captain FV Attie Mae, Bristol Bay Drift Gillnet

Dear Members of the Alaska Board of Fisheries,

My name is Ross Hofacre; submitting this written testimony in opposition of Proposals 44, and 61 through 68.

I am a full time resident of Petersburg, Alaska with interest in the listed proposals as a drift gill net fisherman, S03T permit holder, and owner operator of fishing vessel Jollene K in Bristol Bay.

The main reason I oppose Proposals 44 and 61-68 is because they would modify the current King Salmon Stock of Concern Management Plan in the Nushagak District.

The SOC management plan was developed over 5 years, driven by stakeholders and Advisory Committees from the commercial, sport, and subsistence sectors, as well as representatives from the Alaska Department of Fish and Game. Ultimately it was adopted in March of 2023 and has only been in place for the past 3 fishing seasons.

Data shows the plan has been implemented as intended by reducing exploitation of king salmon in the commercial fishery, increasing escapement prior to harvest exposure, delaying commercial openings, and reducing fishing time during peak Chinook vulnerability. However Chinook salmon typically have a 4-7 year life cycle therefore the plan was not expected to display immediate recovery of Chinook stocks and the plan still needs time to produce results. If work on a 4 year system ends after 3 years is anything truly learned?

I respectfully request the Board allow the plan to remain unchanged and be evaluated over a full Chinook generation.

Sincerely,
Ross Hofacre
F/V Jollene K

Submitted by: David Hollingsworth

Community of Residence: Aberdeen wa

I oppose proposals 44 and 61-69 we need to keep the current plan going forward

Submitted by: Eugene Horvath

N/A

Community of Residence: Oregon

I have reviewed the submission for the new rule changes on the Togiak River. As an avid fisherman, who has spent the last 10 years on the Togiak River fishing for both Kings and Silvers and all the Pacific Species, I highly recommend this change. The active guide services on the Togiak honor and follow all the rules to preserve this fishery. I have spent 10 years observing it with multiple different services. Togiak River Lodge, is by far the most conservative and honorable in protecting this fishery. Sports fishing on the river is a blessing and true outdoorsmen's treasure. The changes to Kings and bait fishing for Sockeye is a real need. Commercial fishing is the issue, not the sports fishing participants.

Submitted by: Calum Houston

Community of Residence: N/A

Dear Members of the Alaska Board of Fisheries,

My name is Calum, I am a drift gill net fisherman in Bristol Bay and I am submitting written testimony regarding the following proposals.

I oppose Proposals 44 and 61–68 to the extent that they would modify the Nushagak District King Salmon Stock of Concern Management Plan.

The SOC plan was developed through a multi-year, stakeholder-driven committee process involving commercial, subsistence, and sport users, Advisory Committees, and the Alaska Department of Fish and Game.

The plan has only been in place for three fishing seasons and was not expected to produce immediate biological recovery given the 4–7 year life cycle of Chinook salmon.

Available analyses indicate the plan is functioning as intended by delaying commercial openings, reducing fishing time during peak Chinook vulnerability, reducing exploitation of king salmon in the commercial fishery, and increasing escapement prior to harvest exposure.

I respectfully request the Board allow the plan to remain unchanged and be evaluated over a full Chinook generation.

Sincerely,

Calum Houston

Submitted by: Robert Huff

JorDanielle inc

Community of Residence: Salish Sea/Washington, whatcon county

Proposal 44 and 61-69 , are skewed towards the sports fishing lodges. We have not even had enough time to see if the last regs have done their work. Also I beleive bycatch from the factory trawlers are the true cause of declines and stopage/much better monitoring of the large trawler fleet is the true answer to this dilemma. Taking this out on 32' drfters and set netters is not a proper solution

Submitted by: Megan Hurlburt

Ekuk Beach Fishermans Association

Community of Residence: Dillingham, AK

Alaska Board of Fisheries – Bristol Bay Finfish Meeting

Madam Chair and Members of the Board,

My name is Megan Hurlburt, and I am a set-net permit holder fishing on Ekuk Beach in the Nushagak District and a member of Ekuk Beach Fishermans Association. I grew up fishing Ekuk beach surrounded by three generations of family that worked this industry before me. My great grandfather fished the site next to me until he was 99 years old and now my children and my nephew are coming up behind me surrounded by their grandparents, aunts, uncles and cousins. This fishery is certainly an economic benefit to my family and as a mom it allows me to bring in a second income that has become so neccesary for families these days while keeping my work schedule as a dietitian very flexible during the school year so I can be involved in my children's education and upbringing without relying on childcare. But even more than that, it feels like coming home to so many people in my family as we gather together every year to continue the tradition. I say all that to say thank you for your service on this board and careful consideration of these proposals because they absolutely make a very real difference in people's lives.

I support Proposal 56, which would make Ekuk's coordinate-based offshore set-net boundary permanent. Adopted by the Board in 2022, this boundary has been working successfully as a clear, predictable, and enforceable seaward limit. Making it permanent provides certainty for set-net placement, drift operations, and enforcement in a high-density fishing area.

I support Proposal 57, which establishes the same boundary as a shoreward limit for drift gear and prohibits contact with set-net gear. This proposal reduces entanglement risk, gearloss, and unsafe nearshore interactions by clearly defining spatial limits and updating set-net gear definitions. As the drift fleet has grown significantly in size and horsepower, these clear, enforceable rules are essential to maintaining an orderly and safe fishery. I have seen so many dangerous incidents and close calls when drift boats/ gear have made contact with set net gear. For example, in 2024, a high powered jet boat ran over my sister's upper end line (connecting the net to the beach anchor) while we were pulling the net with our truck. During this procedure the line is under a deadly amount of tension. Fortunately we saw

the boat coming and my crew were able to get out of the way narrowly escaping being severely injured when the rope snapped. Another boat saw our line snap and towed our net back to us before it was lost which was also a very dangerous process due to the extremely swift tidal current on the beach but we were thankful for their help. Some boat captains will try to tell you that this type of "impact set" is an important part of their fishing strategy but the truth is the majority of the drift fleet in the Nushagak is opposed to this type of set as it is dangerous to both the boat crew and to set net crews and very often results in fish waste as their nets roll in the surf and they can't recover their catch so even among the drift fleet this is recognized as irresponsible fishing. The boats that are making these types of sets are usually driving dangerously everywhere in the district and not making friends amongst the drift fleet either.

I support allowing the Nushagak Chinook Management Plan to work without preemptive alterations. Chinook are long-lived fish with a life cycle of seven years, and meaningful evaluation of conservation outcomes requires time and consistency. This plan was developed through a multi-year, Board-convened stakeholder process and adopted unanimously in 2023. Re-setting management in the middle of the Chinook life cycle creates instability for fishing families and undermines the ability to evaluate whether the plan is working.

I support Proposal 80, which allows limited joint-venture set-net operations under defined conditions. Joint ventures help small, family-based sites adapt to short openings, rising costs, and safety challenges without increasing fishing footprint or promoting consolidation. This approach has worked successfully in Kodiak set-net fisheries for over four decades.

Economic and Community Impacts of Missed Allocation

In recent years, set-net fishermen in the Nushagak District have consistently fallen far short of the Board-adopted 26% set-net allocation. These shortfalls, in harvest share and time, have real consequences for fishing families, local processing, and watershed communities like Ekuk. When allocation exists on paper but is not achieved in practice year after year, the economic and social fabric of Bristol Bay communities is weakened.

Together, these requests are important steps toward equitable harvest share in practice, not just on paper.

Allowing the Chinook Management Plan to complete at least a full life cycle before considering alterations to the plan encourages participation and trust in conservation management; Proposals 56 and 57 reduce conflict and safety risks that disproportionately impact onshore set-net fishermen; and Proposal 80 provides limited flexibility for small operations to adapt to shortened and more complex fishing opportunities. These measures help ensure that set-net fishermen in the Nushagak District have a fairer opportunity to sustain our fishing families and watershed communities over the long term.

Thank you for your consideration and for your service to Alaska's fisheries and fishing communities.

Respectfully submitted,

Megan Hurlburt

Ekuk Beach, Nushagak District

Submitted by: Jimmy Hutchens

Community of Residence: Mount Vernon, Washington

I am a drift gillnet permit holder in the Bristol Bay fishery and I am concerned that several of the proposals that are being considered at the Board of Fish meeting coming up in the near future will adversely affect the ability of the gillnet fleet to be prosecuted effectively. Proposals 61,62,63,64,65,66,67 and 68 will substantially change the Nushagak King Salmon Recovery Plan that was instituted in March of 23. This plan adequately addresses the the recovery of the stock of concern and uses a balanced approach for sockeye and king salmon escapement. This plan should be given a chance to show results since it hasn't even been in place long enough to document one life cycle of the king salmon stock.

I oppose all of the above proposals and would urge the board to not adopt them.

Thank you for your consideration,

Jim Hutchens

Submitted by: Dale Hutchins

Togiak River Lodge

Community of Residence: Grass Valley CA

In regard to the proposal submitted by Jordan and Zach Larsen of the Togiak River Lodge, I would like to say that as a guide at that lodge, they are conservation minded people and only wish to see a healthy eco system and a healthy fishery for that river system! They have fired guides that have shown disrespect for that river system. I believe that what they are proposing is reasonable and I know that if approved, they will abide by the decisions made by State and local fishery authorities.

Respectfully Submitted;

Dale Hutchins, Fishing Guide

Dear Madam Chair & Members of the Board –

I am a year-round resident in Dillingham. My husband and I own and operate a commercial drift vessel, the F/V Kokua in the Nushagak District for sockeye salmon and are a multigenerational commercial fishing family.

We rely on subsistence salmon to feed our family year-round and are recreational sport fishermen in the Nushagak and Wood Tikchik drainages.

Please see below my comments on select 2026 Bristol Bay Finfish Proposals.

Proposal 44 – Oppose the current reporting requirements in regulation are sufficient and subsistence is the priority user in the State of Alaska.

Proposal 55 – Support Repeal the Nushagak River Coho Salmon Management Plan while still ensuring opportunity for Coho harvest is permissible.

Proposal 57 – Support As Amended by the Nushagak AC – Oppose as written in Proposal book

I support the Proposal as Amended by the Nushagak Advisory Committee, aiding in the solution of what is truly an enforcement and safety issue without restricting access to established drift fisherman areas. The proposal as amended would simply instate new regulatory language as follows and disregards the remainder of the proposal:

5 AAC 06.331. Gillnet specifications and operations. Prohibit drift gillnet gear from coming into contact with set gillnet gear in the Nushagak District, as follows:

(w) In the Nushagak District, no part of a drift vessel, gillnet, line, buoy, or other device used to drift a gillnet may be operated so as to come into contact with a set gillnet, line, anchor, peg, stake, buoy, or other device used to operate the setnet.

Proposals 61-69 – Opposed

I am opposed to any changes in the existing Nushagak King Salmon Stock of Concern Management Plan.

This plan was made in collaboration with a diverse user group, carefully vetted and implemented. In its three years of being in regulation the plan has had the intended conservation measures. It is too new in its inception, not even a full lifecycle of a King salmon, to truly know the long-term benefits. We are advocating leaving the plan unchanged for at least another Board cycle, noting subsistence users have reported more Kings available for harvest, the commercial fleet has been standing down for the early season and for windows throughout the run, and sport users' retention and opportunity has been restricted.

If the plan is opened and regulatory changes are made, we are advocating the conservation effort is shared among commercial and sport users with subsistence retaining priority. Proposal 67 in which I am a co-author of and Proposal 66 from Travis Wren would be avenues of discussion for Sport user

concessions, with the commercial users potentially utilizing the WRSMA or adjusted SEG/OEG's as concessions.

Again, the best possible outcome would be to make no changes to the stock of concern plan for this Board cycle and allow more time for true representation of benefits to come to fruition.

Proposals 71-74 & 81 Oppose – I am in opposition to any General District, the introduction of new gear types, or the allowance of fishing outside of the established commercial districts.

Proposals 75-78 Oppose – Permit stacking leads to consolidation of the fleet and is disadvantageous for the local watershed and residents of Bristol Bay. The dual system we have in current regulations is beneficial to residents and non-residents alike and creates opportunity in the fishery.

Proposals 82-91 Oppose – I do not believe any additional regulations or regulation changes are needed regarding vessel specifications. What is needed is clear communication with Law Enforcement prior to the season and an understanding fleet wide of definitions. BBEDC's approach to solving this issue is reasonable and clear; we support their efforts without making regulatory changes. I am opposed to increasing the 32' vessel limit in Bristol Bay, regardless of reported rationale.

For all other proposals not referenced here please defer to the Nushagak AC comments and actions as representation of the Nushagak area.

Quyana,

Susie Jenkins-Brito

Dillingham, AK

Opposition to Proposals 44, 61, 62, 65 and 68

Dear Board of Fisheries Members,

Writing as a Dillingham resident, Bristol Bay drift fisherman and former Board of Fisheries member, I'm familiar with the years of work that went into crafting the Nushagak King Salmon Stock of Concern Management Plan. Proposals 44, 61, 62, 65 and 68 all seek to make changes to that management plan, which is ill-timed and ill-advised. I respectfully urge the board to reject them all.

Work to rebuild Nushagak king stocks began in February of 2018. Initially three Board of Fish members were part of the study group, populated also by four representatives of the sport fishing industry, three commercial fishers, a subsistence representative and three veteran fisheries scientists. (See summary RC46 below, excerpt from https://www.bbsri.org/_files/ugd/bc10d6_759a9fa3abec4ee9810f9c3facf6ee6d.pdf

As Board members, you know how finding agreement among different gear groups can be time consuming and often impossible. The SOC study group agreed from the start to operate on consensus, and took four years to complete its work.

The resulting SOC management plan was approved unanimously by the Board of Fish in March of 2023, and has been on the books for less time than even the youngest chinook salmon could mature and return to spawn. For a species with a life cycle of four to seven years, proposing to change the management plan now is either naive, as in Prop 44, or motivated by allocative reasons as in Proposals 61, 62, 65 and 68.

A reasonable expectation of harvest opportunity for all users was an expectation included in the Board's creation of the Nushagak SOC study group. There was never an expectation that king stocks would recover in one three year board cycle. Reopening debate on the SOC plan suggests that the management plan has failed before it's even begun

I urge the Board to oppose proposals 44, 61, 62, 65 and 68, and any others that would aim to scuttle a carefully crafted and critically important management plan before it's had time to take effect. Changing the structure of the plan would reset that clock, and discredit one of the most thorough stakeholder processes the Board has ever directed. The Nushagak SOC Management plan needs to be evaluated over a full life cycle of chinook salmon.

Thanks for your attention to this, sincerely,

Fritz Johnson
F/V Jazz
Dillingham

Excerpt from report submitted in November 2022, to provide Board with the names of the Nushagak King Salmon Committee members, submitted as an RC in March 2023

Summary of Outcomes from the Committee to Examine the Nushagak-Mulchatna King Salmon Management Plan, 2019-2022

Prepared by:

Tom Brookover, Jeff Regnart, and Michael Link

Bristol Bay Science and Research Institute
Box 1464, Dillingham, Alaska 99576



Prepared for:

Nushagak-Mulchatna King Salmon Management Plan Committee
and
Alaska Board of Fisheries

Final DRAFT, Submitted to Alaska Board of Fisheries, Public Comment

November 14, 2022

Executive Summary

This report is one of four reports prepared by the Study Team that worked with the Alaska Board of Fisheries committee to examine options to revise the Nushagak-Mulchatna King Salmon Management Plan (NMKSMP). This report documents the process and outcomes from that committee, which met between February 2019 and April 2022.¹

During the December 2018 Bristol Bay Finfish meeting, the Board of Fisheries (Board) struck a committee to review Nushagak River and District fisheries and regulations, and to provide recommendations on a comprehensive solution to Chinook salmon management. Three Board members were assigned to the committee (Payton, Morisky, and Ruffner) and the selection of stakeholders to serve on the committee was to be done in early 2019. In February 2019 at the Special Committee Meeting immediately following the Alaska Peninsula/Aleutian Island/Chignik Finfish meeting the Board selected 8 Committee members representing the commercial, sport, and subsistence fisheries. The inaugural committee meeting took place on October 2019 and a total of 15 committee meetings occurred between December 2019 and March 2022. A final committee meeting was to be held in November 2022 to review this report and prepare for the upcoming Board of Fisheries meeting.

As a starting point for discussions during the first year of committee meetings, members identified the current challenges to, or problems with, management of Nushagak River king salmon fisheries. The focus was on challenges or problems related directly to the NMKSMP, but the discussion was not limited to challenges pertaining narrowly or only to the Plan. After discussing the fishery challenges faced by the Nushagak River king salmon fisheries at the initial meetings, committee members were asked to discuss what constitutes success in their various fisheries? Members were then asked to identify possible management objectives that, if implemented, would ideally fulfill the measures of success as identified. Finally, the groups were asked to identify possible changes or additions to the NMKSMP “action” provisions that direct ADF&G to act and that would, in turn, lead to achieving the objectives previously developed in this process.

In January 2021, the full committee reviewed and revised the lists and descriptions of the Measures of Success, Management Objectives, and Possible Management Plan Actions that had been developed. Shortly thereafter, work focused directly on clarifying possible regulatory management actions needed to achieve the management objectives, and further discuss non-regulatory actions needed. BBSRI provided technical information on certain topics, particularly management triggers and the effects of mesh size on sockeye exploitation rates, to inform and address questions raised by the committee. By April 7, 2022, the committee had reached consensus on seven proposed actions. The committee examined five other actions in detail but failed to reach consensus on them. On behalf of the Committee, the Study Team submitted a

¹ The four reports prepared by the study team include: 1) Historical review of Nushagak River King Salmon Management, 2) this report, 3) Technical analysis of options considered by the Nushagak King Salmon committee, and 4) Recommendations for non-regulatory actions for Nushagak King salmon management.

and Research Institute (BBSRI) committed to supporting the committee's work through a stakeholder-led technical analysis of options the committee was expected to consider (RC 80).

Committee Process

Committee Formation

The board released a request for committee nominations on January 31, 2019 (https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2018-2019/nm_committee_nominations_request.pdf). The intent of the solicitation was to have interested parties apply by sending in a letter of interest which included their background in the fishery. The applicants' letters of interest were due to the executive director of boards by February 18, 2019.

The Board received 14 letters of interest from which they chose 8 public committee members to represent the stakeholder groups involved with the Nushagak-Mulchatna King Salmon fishery.

Committee Members

Robert Heyano – Lifelong resident of the Nushagak Bay area. He started fishing in the Nushagak Bay on the family-owned set net site in the 1960s. In 1972 he started drift gillnetting as an owner operator which he still currently doing. He has been active in the Board process since 1978 and served on the Board from 2004 to 2007. He has also served on the Nushagak AC and as its chair. He was on the AC when the original NKMP was drafted in 1991.

Bud Hodson – He has been fishing King Salmon on the Nushagak River for 40+ years with 2 different camps for guided angling for Kings. He served on the Board of Fisheries from 1986 through 1990 and served as Chairman of the Board for over 2 years. He was deeply involved with the original drafting of the NKMP and the allocation considerations in the creation of the original Plan.

Brian Kraft - He was the author of Prop 41 and 42 that were before the BOF in Dillingham at the 2018 meeting. Those proposals were the catalyst for the Board to create this committee. He has owned and operated a fishing lodge in BB for more than 25 years. He has operated a fishing camp on the Nushagak for similar time.

Bob Klontz – He has been involved in the Nushagak King salmon sport fishery since 1984 and a property owner on the river since 1999. His families on-river experience of more than 30 years and networking with other camps and fisherman has given him a well-rounded perspective of the status of the inriver fishery and of the King Salmon stock.

Tom O'Connor – He is a year-round resident within the Nushagak Bay area. He has many decades of experience as a set net fisherman in the Nushagak district on Ekuk beach. He is a

long-time member of the Nushagak AC and has participated in the Board process for more than 20 years.

Nanci Lyons - She has been guiding in the Bristol Bay region since 1985 and has been a user of the Nushagak river since 1986. She was involved in the Board of Fish meetings that constructed and approved the original Nushagak King Salmon management Plan and has been actively involved in the fishery and the management Plan ever since. She is the owner/operator of a sportfishing lodge in the BB area.

Peter Christopher – He is resident of New Stuyahok which is a community on the Nushagak River. He has served on the Nushagak AC for many decades. He has subsistence fished for his entire life and commercially fished in the Nushagak district from 1965 to the present. He is an active subsistence fisher for King, Chum, and Sockeye salmon. He and his family are heavily dependent on the salmon they catch for their winter food.

George Wilson - He resides in Naknek across the Bay from the Nushagak. He has commercially fished since 1980 when he was 9 years old with his dad. He currently owns and operates his vessel and permit and has done so since 1999. His children are his crew and will be taking over the family business in due time. He also participates subsistence fishing.

Study Team Members

A three-person Study Team sponsored by BBSRI led and facilitated the committee process, prepared project analyses, and project reports.

Tom Brookover – Tom worked in various capacities with ADF&G since 1985, including as the Commercial Fisheries Assistant and Area Management Biologist for the Nushagak District from 1990-1998. He also worked as the Sport Fish Area Biologist in Sitka, Southeast Alaska Management Supervisor, Statewide Habitat Research Supervisor, and Deputy Director. Tom served as Director of Sport Fisheries Division from 2015 – 2018. Tom joined BBSRI's Nushagak Study Team shortly after retiring from ADF&G in 2018.

Michael Link – Michael has been the Executive Director of the Bristol Bay Science and Research Institute (BBSRI) since 2002. He first worked in Bristol Bay as the Research Project Leader for ADF&G's Commercial Fisheries Division in the late 1990s. Michael has led numerous research projects and policy analyses including an extensive multidisciplinary analysis of escapement goal policies for Bristol Bay sockeye salmon (2012-2015, <https://www.bbsri.org/escapement-goal-analysis>). Farther back, he led an analysis to examine options to restructure the Bristol Bay commercial salmon fishery (2001-2003, <https://www.bbsri.org/other-project-reports>).

Jeff Regnart – Jeff has held several positions within Bristol Bay. Starting in 1990 he was the commercial fishery manager for the Naknek-Kvichak district. He then moved into a variety of Bristol Bay regional positions each with a greater scope of responsibility. From 2011 to 2015, Jeff served as Director of the Commercial Fishery Division of ADF&G where he represented the department in the Board of Fisheries process. Since retiring in 2015 Jeff has done fisheries recertification work with the Alaska Seafood Marketing Institute and has worked as a technical advisor to BBSRI.

Submitted by: Stuart Jones

Community of Residence: Kenai Peninsula

Subject: Written Testimony – Board of Fisheries Proposals

Dear Members of the Alaska Board of Fisheries,

My name is Stuart Jones, and I am submitting written testimony regarding the following proposals.

I oppose Proposals 44 and 61–68 to the extent that they would modify the Nushagak District King Salmon Stock of Concern Management Plan.

The SOC plan was developed through a multi-year, stakeholder-driven committee process involving commercial, subsistence, and sport users, Advisory Committees, and the Alaska Department of Fish and Game.

The plan has only been in place for three fishing seasons and was not expected to produce immediate biological recovery given the 4–7 year life cycle of Chinook salmon.

Available analyses indicate the plan is functioning as intended by delaying commercial openings, reducing fishing time during peak Chinook vulnerability, reducing exploitation of king salmon in the commercial fishery, and increasing escapement prior to harvest exposure.

I respectfully request the Board allow the plan to remain unchanged and be evaluated over a full Chinook generation.

Sincerely,

Stuart A. Jones

USMC (ret.)

F/V Sophia Marie- Bristol Bay Deckhand

Submitted by: Frances Kaul

Community of Residence: Winthrop, WA

I am a Bristol Bay Fisher woman who started fishing in 1987. I would like to express my opposition to proposals 44, 61, 62, 63, 64, 65, 66, 67, and 68. These proposals could greatly impact the harvest of those of us commercial fisherman who fish in the Nushagak. These proposals would restructure a management plan that has yet been given the time to be evaluated. Why would the BOF even consider resetting the clock and change the structure of the plan before it has had time to be evaluated properly?

Submitted by: Omar Keval

Community of Residence: Snohomish

I have been fishing in Bristol Bay for Almost 20 years now and it is the livelihood of my family and me.

Proposal 44, 61-68 riss not only destroying the zockele stock of the nushugak river, our strongest, but also destroying our livelihood.

Submitted by: Matthew Kinney

Community of Residence: Sitka, Alaska

Honorary board members, please consider leaving the plan unchanged, as a restructuring event would result in a major financial loss to the commercial fishing community, and to the communities that it supports throughout the region. Please allow status quo at least long enough to monitor the effects of the current management plan throughout a full generation of chinook salmon. Repealing the current management plan doesn't allow for a true study of its biological consequences and thus all positive headway toward research and ultimately conservation is thwarted. Thank you honorary board members for volunteering your time as I know these are not light duties to take on. We appreciate you.

Matt Kinney.

Comments on BoF Proposal 61

My name is Casey Knight and I am a 40-year-old second generation Bristol Bay drift gillnet fisherman. I have a young family. This fishery has been my primary source of income for 25 years (not counting early childhood, before I began crewing).

I **strongly oppose** Proposal 61. My reasons are as follows:

1. The proposal is poorly written. Under the section “What is the issue you would like the Board to address and why?”, the proponents of the proposal included a single two-sentence paragraph. In these two sentences, there are three typos. In addition, under the section “Did you develop your proposal in coordination with others?”, the proponents wrote ‘Not applicable’. This is clearly false. It is a Yes-or-No question; the answer to the question must be either ‘yes’ or ‘no’ — ‘not applicable’ is not an option. So which is it? Presumably, if the answer is ‘Yes’, it would be incumbent to say with whom you coordinated and what reasons for and against the proposal were considered. And if the answer is ‘No’, it seems important to give a brief explanation of why not.
2. The proponents of the proposal failed to address obvious relevant questions, such as: (i) Why do you think the current king salmon management plan is inadequate to handle your concerns? (ii) What would be the likely economic impact to various user groups, and how might they be alleviated? (iii) Have you considered other alternatives that might address your worries? (iv) Can you estimate the likely increase in king salmon escapement as a result of the adoption of your proposal? Until answers to questions such as these are *at least addressed*, the Board should not take this proposal seriously.
3. In 2023, the current king salmon management plan was adopted, after *extensive review* by stakeholders and ADF&G representatives. To change the management plan once again as the result of a *two-sentence, typo-ridden spiel* seems unwarranted.
4. As I understand it, king salmon are on a roughly 5-year cycle (feel free to correct me; but even if some kings are only 3- or 4-years-old when they return, this point still stands). Since the current management plan is only two years old, this means that there is no basis to claim that the current management plan is somehow “not working”. Consider an analogy. Suppose the coach of your basketball team, after extensive study of the opponent’s offense (and even after conferring with the players), decides that you should play a 2-3 zone against them. But then one member of the team objects in the locker room, just prior to the game, before you have even given the 2-3 zone a chance. Imagine that the objector would rather go man-to-man; he says that the 2-3 zone is “just not working”. Should the coach take the objector seriously? Clearly not.

I urge the Board not to pass this ill-conceived, hastily-written proposal. Thank you for your consideration.

Casey Knight
F/V Eden
PO Box 942
Petersburg, AK 99833
907-650-7345
caseyaknight@gmail.com

Submitted by: Chris Knight

Community of Residence: Juneau, AK

Strongly support proposal 75, 76 and other similar proposals.

Purpose: These two proposals would allow for a single BB permit holder to hold two permits and continue with the current status quo of fishing two permits from a single vessel thus allowing one boat to fish 200 fathoms of gear(permit stacking).

Permit Stacking: The aim of permit stacking accomplishes two things: (1) proposals increase the net coverage by the vessel upwards of 25% of additional fishing gear. (2) permit stacking removes to date about about 35,000 fathoms (350 boats with dual permits multiplied by 100fathoms) of fishing gear from the water allowing all fishermen to catch more fish or at least have a better chance of catching more fish with a great deal of gear out of the water.

Recent board actions: You as a board recently allowed a single individual to hold two permits in Prince William Sound Gillnet fishery, which allowed individuals to stack permits to remove excess fishing gear from the water. While permit stacking currently exists in Bristol Bay, two different permit holders must be on the vessel, which has created a nefarious process of stealing by some crew members and loss of assets to families. Skippers must either find another person with a permit or trust a family asset with another person which has resulted in some cases of outright theft. Under current CFEC law, the permit holder becomes the owner regardless. In the past, the BOF has not allowed two permits in a stacking operation to be owned by one individual in Bristol Bay

Opposition to single individual permit stacking in BB has expressed concern on two fronts: one the permit values become more expensive, and two the permits are leaving the drainage. Recent permit values have been such high flux from \$65K just a few years ago to \$150K now..what we need is a stabilized value for older generation to retire out of the fishery. All too often fishermen stay in the game too long hoping to recover investemnt. Secondly, As an Alaska Resident all of my life -I deserve the same right and access to the fishery afforded to me under the Alaska Constitution as a drainage resident. There should be no difference in the rights and value to the fishery for all fishermen.

Current options for Drainage residents: Current Drainage residents have access to the AK Dept of Commerce loan program, the same loan program I used to buy my own bb permit. Additionally drainage residents have access to additional loan program with zero dollars down provided by the Bristol Bay Native Corporation. These zero interest loans and zero down programs allow anyone in the drainage to by a bb permit. Additionally the largest exodus of drainage permits holders occurred in 2007 during the fuel crisis, driving most drainage bb permit holders out to Anchorage and Washington state to find a chearper cost of living.

For the future of Bristol Bay and my residential income and family support, we need permit stacking in a single individual to stabilize the value of the permits in the fishery while removing excess gear from the water. Please after all these years, support the permits stacking as it was intended to do and as you have done for Prince William Sound.

Submitted by: Chris Knight

Community of Residence: Juneau, AK

Proposals 61 and 69

These two proposals are submitted by an entity seeking to create havoc in the commercial sockeye salmon fishery. The proposals undo existing management plans for King salmon and limit the commercial availability of sockeye salmon into the commercial market which would remove taxes and revenues from fishermen, processors and the state of Alaska as a whole.

Proposal 61 seeks to destroy the Nushagak salmon fishery by grossly over escaping the watershed potentially leading to large die offs of all future salmon species.. Bill Smoker, a fisheries biologist with NOAA fisheries documented the die off of Kvichak sockeye and other species occurring in the early 1990s caused single handedly by large over-escape ment leading to excessive Nitrogen regimes in Lake Iliamna. The lake was unproductive for many years 10-15 years) due to the excess escapement.

While Proposal 61 aims to protect King Salmon its ultimate goals would ruin the river and lakes associated with the Nushagak River. Without adequate interception of sockeye, the system as a whole will become over escaped and displace important oxygen needed for egg rearing, fry development, smolt production and importantly future King Salmon, sockeye salmon production and other species. Proposition 69 is similar again restricting the commercial fishery altogether.

Neither proposal should be considered whatsoever as they are fundamentally flawed and biologically irresponsible. Please disregard proposal 61 and 69.

PC105

Submitted by: Kyle Knight

Community of Residence: Petersburg, AK

I'm a Bristol Bay commercial gillnetter and I am strongly opposed to propositions that will change the current king salmon management plan in Bristol Bay by further restricting directed commercial sockeye salmon gillnetting. The current king salmon management plan has not been given enough time to assess it's efficacy. Passing further restrictions that specifically target the commercial sector does not share the burden of conservation & could have the effect of excessively restricting sockeye salmon harvest opportunity in a fashion inconsistent with the Alaska State Constitutions "maximum sustainable yield" mandate. It could cost the commercial sector & canneries millions of dollars & the Dillingham borough considerable money in raw fish tax.

Please do not pass more unfair & punitive regulation changes that favor the sport & charter industry at the expense of the commercial sector.

PC106

Submitted by: Will Koger

Community of Residence: Washington state

I'm a Bristol bay drift permit holder and I have held a permit for the last 25 years and I have fished in Bristol Bay for the last 34 years. I strongly appose 61-68! I would like ADFG to keep running it as it has been in the past.

PC107

Submitted by: Peter Konovalov

Community of Residence: Homer

If we get shut down til the 28th the sports fisherman should be shut down too to support King Salmon escapement

PC108

Submitted by: Fiona Kroontje

Community of Residence: Richland Washington

Proposals 61 and 62 puts undo burdens on commercial fleet - this should be addressed in other ways

PC109

Submitted by: John Kroontje

Community of Residence: Lynden

Please do not add more conservation efforts burdening the commercial fleet.

PC110

Submitted by: Kara Kroontje

Community of Residence: King Salmon, AK

Proposal 61 and 62 - do not force more conservation efforts on the commercial fleet. They have already significantly reduced their share of king harvest

PC111

Submitted by: Lesa Kroontje

Community of Residence: Lynden WA

Proposal 61 and 62. Do not force additional conservative efforts on the commercial fleet. The contribution of this fishery should be recognized and should not bear the burden of additional regulatory measures.

PC112

Submitted by: Thijs Kroontje

Community of Residence: Lynden, Washington

Proposal 61 & 62 do not add more conservation efforts on the drift boat fleet

Submitted by: Viola Kroontje

Community of Residence: Lynden, WA

proposal 61 & 62

don't further burden the commercial fleet with more conservation efforts forced upon them.

Submitted by: William Kroontje

Community of Residence: King Salmon

My name is William Kroontje, resident of King Salmon, Alaska. I am a current SO3T permit holder, vessel owner, and fishery conservationist. I have been actively participating in both set and drift net commercial fishing in Bristol Bay since 2007.

Proposal 57

I strongly oppose this proposal.

There are currently very specific regulations that outline requirements for how drift and set net gear must be managed. Creating new boundary lines which include set net, but exclude drift boats, in certain areas of water, is ridiculous. It is not uncommon for areas of beach to be free of set nets. Currently, drift boats are able to access these areas and operate their gear in a legal manner, that includes maintaining specific distances from set nets.

The highest concentration of sockeye salmon is often tight to the shore line. Reserving and restricting areas such as these for setnet gear only, is in no way fair or equitable to the drift fleet. Please disregard this proposal, as it aims to greatly benefit a small and specific user group at the expense of the large majority of the fleet.

Proposal 61 and 62:

I strongly oppose both of these proposals. These proposals both aim to increase the burden of king salmon conservation upon the commercial gill net fleet. The commercial fishing fleet has already drastically reduced their historical share of the king salmon harvest, and forgone any commercial king openers for a generation. While commercial gillnet users have been making significant sacrifice, the sport fishing user group has increased their share of harvest.

Historically, from 1966- 2022, commercial gillnet has maintained an 80.3% share of nushagak king salmon harvest. In this same time period, sport fishermen have maintained an average of 5.5% of the harvest. In the spirit of conservation, commercial fishermen have recently reduced their king harvest share to 1/10th its historical average (2022), while sport fishermen have increased their historical catch by approximately 50%.

Recent king salmon conservation efforts made by the commercial fleet have had enormous biologic and financial impacts on the sockeye fishery. The impact of these new conservation efforts are largely unknown at this time. Doubling down on these efforts via these proposals, would result in potentially catastrophic results for the sockeye fishery.

It is not sensible for commercial fishermen to be depressed further by extreme conservation efforts, while sport fishermen are actively targeting and harvesting the very fish the commercial fleet has sacrificed to save. The commercial fleet has currently gone to the furthest extent reasonably possible to prevent the unintentional catch of king salmon

If further conservation efforts need to be made for nushagak king salmon, adding burden to the commercial gill net fleet should not be a consideration at this time. The commercial fleet has long since halted intentional harvest entirely; it's only fair that the sport industry follow suit as the next step in conservation.

Data stated above was derived from the source cited at the end of Proposal 62

"(as cited in Table 1 of the "Nushagak River King Salmon – Stock Status and Action Plan" Nov 29, 2022)"

Proposal 70, 71, 72

I strongly oppose these proposals and others that pertain to the implementation of a general district.

Removing district boundary lines late in the season will have unintended effects. There will be an increase in fishing participation late in the season. The increased participation and larger fishing area will result in more fish being caught. Of the increase in catch, some fish may be genetically important to particular stocks or spawning streams. Increasing the catch of these fish could have very negative impacts on the health and viability of certain ecosystems.

It is common for fishermen to assume that every fish above and beyond the escapement goal is surplus available for harvest. I do not believe this to be the case. The current regulations and boundary lines, although frustrating at times, have proved to allow for sustainable sockeye returns and profitable commercial harvest.

Proposal 76

I strongly support this proposal

Allowing the stacking of drift permits will help facilitate natural reduction and or growth of fleet size based on the current economics of the fishery. Fleet reduction will also aid in conservation efforts for stocks of concern, such as king salmon.

Currently, the average fisherman in Bristol Bay struggles to maintain sustainable profit levels. Many watershed residents are unable to participate, as it is not financially sensible. Potential local fishery participants are forced to forgo fishing opportunities in favor of other year round job commitments to make ends meet. Measures that facilitate fleet reduction will increase profitability, allowing more state and local residents to pursue fishing opportunities as viable options.

PC115

Submitted by: Kurt Kvernvik

Community of Residence: Petersburg Alaska

I strongly oppose proposal # 44 and proposals 61-68

We have a management plan in place that addresses the King Salmon declines in population and minimizes the fleets impacts on the King Salmon Stock. Implementing any of these proposals , would significantly harm the Sockeye salmon fishery, the Fisherman, the processors and the communities that depend on the Nushagak Sockeye harvest.

I strongly support proposal 78

Proposal 78 addresses the fact that recent studies have shown. That there are too many boats chasing too few salmon for too low of a value. Many boats are struggling to attract crew, as the average shares do little to compete with safer onshore employment. Allowing a single boat owner to own and operate 2 permits will further reduce congestion in the fishery, thus supplying higher wages for the average crew and making management less complicated for all the Rivers in Bristol Bay.



Boards Support Section
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, AK 99811

December 29, 2025

Subject: BOF Record Comments - **Kvichak Setnetters Association**

Dear Members of the Alaska Board of Fisheries,

The Kvichak Setnetters Association (KSA) represents set gillnet permit holders in the Kvichak Section of the Naknek-Kvichak District. With 82 active, dues-paying members, we form a significant and experienced segment of Bristol Bay's historic fixed-gear fishery. Our mission is to present a unified voice for our members, especially at Board of Fisheries meetings. We work to ensure that set net fishers in the Kvichak section are given fair access to sockeye bound for the Kvichak River.

Located at the eastern end of the bay, our section faces unique challenges that require targeted regulations to ensure equitable access and sustainable yields.

Our positions on specific proposals are summarized in the following table. We respectfully urge you to give consideration to the informed perspective of KSA members.

Proposal	KSA Opinion	Kvichak Setnetters Association Board comments
45,46,47	SUPPORT	District Registration and Reregistration End Date (July 17 → July 22) Extending the district registration and reregistration deadline to July 22 provides managers with additional flexibility during a critical portion of the season when run strength, timing, and in-season performance become clearer. This change supports more accurate escapement management while helping maintain reasonable balance between gear groups. Given the late-season dynamics of the Kvichak section and its position at the terminus of Bristol Bay, additional registration flexibility improves management precision without expanding overall fishing effort.
48	SUPPORT	KRSA Fixed 2:1 Drift/Set Ratio KSA supports modifying the Kvichak River Special Harvest Area (KRSA) to a fixed 2:1 drift-to-set opening ratio. The current 3:1 ratio in both the KRSA and the Naknek River Special Harvest area (which the KRSA was modeled after) is outdated and unfair to setnetters. The drift fleet is highly mobile and able to change districts mid season if a particular district is falling short of escapement, but the number of setnetters fishing in that district does not change as setnetters are generally married to their area, with shore based operations they can not travel far from. It makes very little sense that setnetters must sit out 3 out of 4 openers while drifters get 3x the fishing time no matter how low the participation is of the drift fleet during a KRSA opener. A 2:1 ratio is a more equitable distribution between groups and should apply to both the Naknek and Kvichak special harvest districts.
49	SUPPORT	Dynamic KRSA Drift/Set Ratio KSA supports the concept of a dynamic drift-to-set ratio. If a dynamic approach proves overly complex or difficult to administer in real time, KSA strongly prefers reverting to the fixed 2:1 ratio described in Proposal 48 for simplicity.
50	SUPPORT	Incorporating Fish Quality into Management Decisions KSA strongly supports incorporating fish quality considerations into Bristol Bay commercial salmon management. Harvest quality directly affects ex-vessel value, market reputation, and long-term economic sustainability for fishing families and communities. Managing for high product quality—while minimizing waste—is consistent with maximizing the value of the resource and aligns with modern market realities. Quality is no longer a secondary consideration; it is integral to the economic health of the fishery.

Proposal	KSA Opinion	Kvichak Setnetters Association Board comments
51	SUPPORT	Additional Drift Gear Carried in KRSHA (Brailer Bag Requirement) KSA supports allowing additional drift gillnet gear to be carried onboard in the Kvichak River Special Harvest Area, provided that total onboard gear limits are maintained and additional nets are stowed in a brailer bag. This proposal maximizes quality while minimizing the inconvenience of having to remove gear off the vessel prior to participating in the KRSHA.
52,53	NEUTRAL	Egegik Special Harvest District KSA takes no formal position on Proposals 52 and 53 related to the Egegik Special Harvest District.
61	OPPOSE	Nushagak District King Salmon Triggered Sockeye Closures KSA opposes Proposal 61, which would impose daily commercial sockeye closures in the Nushagak District based on king salmon projections. This proposal relies on uncertain in-season projections and does not adequately demonstrate that the proposed closures would meaningfully improve king salmon outcomes. More importantly, restricting fishing opportunity in one district predictably displaces effort into neighboring districts, including the Naknek/Kvichak District, increasing congestion and management pressure without addressing underlying stock-specific issues. Proposal 61 limits district Biologists' ability to manage sockeye escapement, most likely leading to overescapement of sockeye salmon. This could negatively affect all salmon species.
62	OPPOSE	Delayed Nushagak Commercial Fishing Until June 28 or King Escapement Threshold KSA opposes Proposal 62 for similar reasons. Broad early-season closures in the Nushagak District risk shifting fishing effort into adjacent districts rather than achieving conservation objectives. Without clear evidence that this approach materially improves king salmon returns, the proposal represents a reduction in commercial opportunity with significant cross-district consequences and uncertain biological benefit.
70	OPPOSE	Expansion of Ugashik District by 40% KSA strongly opposes expanding the Ugashik District by 40%. This proposal would increase interception of Kvichak-bound stocks, directly undermining access for Kvichak setnet permit holders. District boundary expansions that increase mixed-stock interception should

Proposal	KSA Opinion	Kvichak Setnetters Association Board comments
		be avoided unless supported by clear biological justification and allocation analysis, neither of which is demonstrated here.
71-74	OPPOSE	Reestablish General District The creation of a general district contradicts the ADF&G biologist's priority of managing each district as a terminal fishery and establishes an intercept fishery. Daily harvest numbers for each district are essential for biologists to manage run size and allocation, and a district in the middle of the bay would be impossible for management to assess what river those fish were bound for. This proposal would increase interception of Kvichak-bound stocks, directly undermining access for Kvichak setnet permit holders.
75-78	Neutral	Drift Permit Stacking KSA is neutral on drift permit stacking. However, if permit stacking is authorized for drift fisheries, parity considerations suggest that stacking opportunities should also be evaluated for setnet permit holders to maintain equitable access across gear groups.
80	SUPPORT	Joint Ventures for Setnet Permit Holders KSA supports allowing joint ventures for up to two setnet permit holders. Limited-scale joint ventures can improve safety, efficiency, and economic viability without materially increasing fishing power. Any expansion beyond small-scale ventures should be approached cautiously and evaluated by the Board rather than assumed through statute alone.
81	NEUTRAL	Use of Alternative Gear in Bristol Bay KSA is neutral on the use of alternative gear. While innovation and experimentation may have merit, any alternative gear proposals should be tested on a limited scale with careful consideration of site-specific impacts. Given the fixed nature of setnet sites, even small-footprint gear could have disproportionate effects on neighboring operations if not carefully evaluated.
92	OPPOSE	Closing Naknek/Kvichak District After July 25 We strongly oppose closing the Nak/Kvi district after July 25. As it becomes late July many vessels have been put up and setnetters gone home – it completely takes away the opportunity for the harvest of surplus sockeye, particularly for locals who are better set up for fishing late run salmon. The “historical data” referenced is outdated. Salmon run times have been occurring later in recent years and the

Proposal	KSA Opinion	Kvichak Setnetters Association Board comments
		large processors have been processing sockeye later than the historical norm. We would need more current data before risking a large economic impact.
105	OPPOSE	Creation of New Bristol Bay King Salmon Management Plans KSA opposes creating new king salmon management plans in rivers that do not currently have them unless adequate data can be collected and clear biological goals can be crafted from adequate historical data.

Thank you for your consideration and public service. Several of our members will be available for further testimony during the meeting.

Sincerely,

The Kvichak Setnetters Association Board

Kvichaksetnetters@gmail.com

Corey Arnold - President

Aaron Schrier - Vice President

Eric Meyer - Treasurer

Tiel Smith

John Schandelmeier

Joe Echo-Hawk

Lake and Peninsula Borough Comments

Re: Permit stacking in the Bristol Bay drift fishery

The Lake and Peninsula Borough (LPB) appreciates the opportunity to comment on proposals submitted for the Board of Fisheries Bristol Bay Finfish Meeting.

Our Borough encompasses 17 communities today spanning three distinct and diverse fishing regions of southwestern Alaska: the Lake Iliamna Area, which includes the Kvichak River, the Upper Area of the Alaska Peninsula, and the Chignik Area on the Pacific side of the Alaska Peninsula. These communities are home to Central Yup'ik, Unangax, Alutiiq, and Dena'ina Peoples with a recorded history of 9,000+ years of hunting and fishing. In the last 150+ years, Lake and Pen Borough communities and residents have come to engage and rely heavily on commercial fishing opportunities and seafood industry-related income.

LPB submits these comments on proposals pertaining to the potential introduction of permit stacking in Bristol Bay salmon fisheries. Specifically, Proposals 75-78 propose allowing for some variation of permit stacking in the Bristol Bay salmon drift fishery.

LPB strongly opposes plans to introduce permit stacking in Bristol Bay salmon fisheries and considers permit stacking to be a major restructuring of the fishery that will dramatically change how (and by whom) fish are harvested. In the past we have seen how these kinds of measures disproportionately harm local participation in fisheries.

Gho (2020) documents how the dual permit regulation change adopted by the Board of Fisheries in 2004 has negatively impacted local and Alaskan permit ownership in the Bristol Bay salmon drift fishery. Although the motivation behind this regulation was to reduce the transfer of permits to nonresidents and encourage new entrants from Alaskan communities local to the fisheries, it has instead had the opposite effect and shifted access across residency categories, primarily benefiting nonresidents.¹ Gho (2020:21) describes how the dual permit program has attracted new entrants as intended, however, since allowing dual permit operations in 2004, nonresidents account for 58% of new entrants into the drift fishery. The share of drift permits owned by Alaska residents declined from 63% to 45% in this time frame (ibid). It would be helpful to this issue as well as a matter of regular reporting to systematically publish the rate of new entrants by residency category. This would clearly show what the overall rate of new entrants masks; a large difference between local, nonlocal, and nonresident new entrants.

Similar impacts have been documented in the Bristol Bay setnet fishery following passage of HB 286 (2002) and HB 251 (2006) in the Alaska State Legislature. HB 286 allows a person

¹ Gho, M. 2020. Bristol Bay Dual Permit Operations, Vessel Heterogeneity, and the Migration of Alaskan Permit Holders. Dissertation. University of Alaska Fairbanks. Fairbanks, AK, August 2020.

to hold two permits, although only one permit can be fished. The intent of this statute was to allow Alaskans to retain permits until they could be transferred to other Alaskans rather than sold to nonresidents. The passage of HB 251 allowed the BOF to grant a person who holds two permits additional fishing opportunity. Notably, when a similar regulation change was proposed in the 1990s, it was presented primarily as a fleet reduction tool, and not an appropriate permit retention tool. In fact, one of the identified drawbacks to the proposed regulation was increased demand for permits resulting in “some individual Alaskans most dependent upon their local fisheries sell[ing] their entry permits” (CFEC 1998:24).² The BOF authorized permit stacking in the Bristol Bay setnet fishery in 2010 (CFEC 2012).³ Although the regulation sunset in 2012, available data shows that permit stacking reallocates harvests across residency classes in Bristol Bay fisheries (CFEC 2012:13). Permit stacking also reduced opportunity for new entrants into the setnet fishery (ibid.).

LPB is concerned with the immediate and cascading effects of allowing for permit stacking in Bristol Bay fisheries, especially further erosion of local permit holdings and reduced new entrant opportunity overall.

Further, it is unclear how permit stacking will lead to improved conservation and management outcomes of the fishery, especially with regard to managing fisheries for the maximum benefit of Alaskans. Clearly established guidance and criteria is needed to evaluate the need, goals, and desired outcomes for restructuring of a fishery via permit stacking.

The stakes are high when it comes to restructuring a fishery, and they are especially high for local participants who often earn significantly less from fishing than nonlocal participants but are much more dependent on the fishery for their cash incomes (see CFEC 2018, 2025, Knapp 2014).⁴ The commercial salmon fishery represents the primary private source of cash employment in the Bristol Bay region, even while local residents have the lowest average earnings per permit fished (see for example Knapp 2014:121; CFEC 2025).⁵

LPB opposes permit stacking in Bristol Bay fisheries and thanks the Board of Fisheries for their time and careful analysis of such proposals.

² Commercial Fisheries Entry Commission (CFEC). 1998. Outline of Options for Fleet Consolidation in Alaska Salmon Fisheries. CFEC report. December 1998.

³ Commercial Fisheries Entry Commission. 2012. Bristol Bay Set Gillnet Permit Stacking. CFEC Report 605. no. 12-02-N November 2012.

⁴ Commercial Fisheries Entry Commission. 2018. CFEC Permit Holdings and Estimates of Gross Earnings in the Bristol Bay Commercial Salmon Fisheries, 1975-2017, CFEC Report 18-7N.

Knapp, G. 2014. Bristol Bay Wild Salmon Ecosystem: Baseline Levels of Economic Activity and Values in Assessment of Potential Mining Impacts on Salmon Ecosystems of Bristol Bay, AK. Volume 3 Appendix E, Available at https://www.epa.gov/sites/production/files/2015-05/documents/bristol_bay_assessment_final_2014_vol3.pdf

⁵ Commercial Fisheries Entry Commission. 2025. CFEC Permit Holdings and Estimates of Gross Earnings in the Bristol Bay Commercial Salmon Fisheries, 1975-2024, CFEC Report 25-07N.

Submitted by: Donald Lawhead

Community of Residence: Wasilla Alaska

Dear Members of Alaska Board of Fisheries

My name is Donald Lawhead , I am a drift gill net fisherman in Bristol Bay and I am submitting written testimony regarding the following proposals

I oppose Proposals 44 and 61-68 to the extent they would modify the Nushagak King Salmon Stock of Concern Management Plan.

The SOC was developed through a multi-year stockholder-driven committee process involving commercial, subsistence, and sport users, Advisory Committees, and Alaska Department of Fish and Game.

The plan has only been in place for three fishing seasons and needs more time to see how it is working. The plan is working as intended delaying commercial openings, reducing fishing time to allow Chinook escapement. The large sockeye salmon runs have returned early and ADFG has the ability to target them while allowing Chinook escapements.

This last summer over 7 million sockeye salmon returned before June 28th.

Some summers that is the entire run of sockeye.

I respectfully request the Board allow the plan to remain unchanged and be evaluated over a longer period of time.

I oppose Proposals 44-47 and no need to change the dates.

I oppose Proposal 92 no need to close to fishing.

Sincerely

Donald Lawhead

F/V Diondra Jean

Submitted by: Dominic Lee

Community of Residence: Utah (I am a Commercial Bristol Bay Drift fisherman)

Prop 45: It is true that this district has a later run timing and for those who fish only in this district can be negatively affected by the influx of vessels who've already put a season in another district and come here with a free transfer. I'm neutral to slightly in favor.

Prop 46:It is true that this district has a later run timing and for those who fish only in this district can be negatively affected by the influx of vessels who've already put a season in another district and come here with a free transfer. I'm neutral to slightly in favor.

Prop 51:This proposal makes sense. Having to drop gear off to a tender to fish a special harvest area is a complicated mess. Bagging it and holding it aboard is more reasonable. I support this proposal.

Prop 52: This proposal sets out to solve a problem I didn't know existed. I don't see a problem with giving the biologist more tools to maximize harvest when escapement is strong.

Prop 56: With sealevel change, this proposal while trying to establish clarity may have unintended consequences, potentially allowing setnets to operation well away from shore. I think this needs to be further discussed before I can support this. Not in support.

Prop 57: I do not support this. This essentially makes a setnet exclusive area regardless of setnets being in the water or not. This area is a concentrator and setnetters are trying to make this a setnet only area. I do not support this proposal.

Prop 59: I'm neutral on this one. The wood river special harvest area is a tool that allows for additional harvest when the Nush is behind. It also allows for allocation adjustment. I don't mind letting setnetters to catch up using this tool.

Prop 61: We need to develop an accurate way to count King Salmon first before we make any more regulation that rely on scanty information. I do not support this proposal.

Prop 62: We need to develop an accurate way to count King Salmon first before we make any more regulation that relies on scanty information. I do not support this proposal.

Prop 63: This is a step in the right direction. More accurate data is needed to properly manage kings in this system. I support this proposal.

Prop 64: I agree with the logic of this proposal.

Prop 65: I do not support this proposal.

Prop 66: Again, we need accurate counting first. I do not support this proposal.

Prop 67: Again, we need accurate counting first. I do not support this proposal.

Prop 68: Again, we need accurate counting first. I do not support this proposal.

Prop 69: Again, we need accurate counting first. I do not support this proposal.

Prop 71: I strongly support this. Late season once all rivers have met escapement goals there is no need for boundaries that confine fishermen to districts and incentives fishermen to fish illegally. There is no reason to continue to restrict fishermen to these small areas. It creates conflict and encourages illegal fishing. By adopting a general district like this also eliminates the need to enforce those boundaries. This is way past due.

Prop 72: This is another good approach to the general district as proposed in #72. I support a general district.

prop 73: This proposal has good intent. I think the prior two proposal have better language and address the same issue.

Prop 74: I support this proposal.

Prop 75: Permit stacking has many benefits. I strongly support this.

Prop 76: I support this proposal.

Prop 82 to 91: I agree with the intent of these proposal. I think we should just remove the length limit. I believe the number one issue to get the most economic value out of the resource is to have the highest quality product. Currently the 32 ft vessels are not set up to handle let alone refrigerate all the fish they

catch in a day. If we are going to give the customer what they want we need to improve handling at the point of harvest. We need to treat fish like the troll fishery does in SE Alaska. To do that at scale we need bigger hold capacity and capacity to hold more crew to process fish on board at scale as they come aboard.

Prop 92: I don't support this proposal.

Prop 95: I'd rather see a non-registration required general district for free-week.

PC120

Submitted by: Jon LeVan

Community of Residence: Seward, Alaska

Jon LeVan FV K2

Alaska resident 28 years (from birth)

Fishing Bristol Bay 12 years 4 as an owner/captain

44, 61-69 No changes to King salmon plan till we see what a full cycle does. Commercial fisherman already are taking the a loss to a problem that they are not the leading factor or cause of but we would like to save Kings also I think the plan is working to the extent it can.

52, Strongly approve I fish Egegik and talked to Luke who proposed this idea for over an hour and strongly with his reasoning both historical and looking forward. Please adopt this proposal.

53 Strongly oppose, does not solve anything and only adds more problems.

70 Any drifter can drop there card in any district we can't change boundary lines just because some fisherman love there district so much and don't want to fish anywhere else.

72 Strongly approve some form of a general district for late season fishing it is the best solution to deal with many late season problems.

77 Support but I don't support permits being bought back as the new E permits would be worth more. I like the idea of allowing one fisherman to legally own and fish two permits, but I do have to say it really made it possible for me to enter the fishery by being a 'D' permit holder and then buying a boat to fish my own permit. However any stacking law would prohibit this but if permits shot up in value it would be hard to enter the fishery. I like this proposal because it has a cap of E permits 300 to help us get to a better # of vessels fishing and also allow people to be legal owning 2 permits. I think we should adopt this proposal but not buy back permits.

PC121

Submitted by: Crosby LeVeen

Community of Residence: Cordova Alaska

I oppose 44 and 61 through 66

Submitted by: Joshua Lewis

Community of Residence: Anchorage, ALASKA

I am a commercial salmon drift fisherman that has fished in the Nushagak for the past thirty-five years. I am writing to oppose Proposals 44, 61-68. I am asking the Board of Fisheries to leave the plan unchanged. The current plan has not been given adequate time to demonstrate its effectiveness. Closing the fishery until the 28th of June will result in massive overstatement of sockeye salmon in both the Nushagak and Wood rivers.

Thank you for your consideration.

Joshua Lewis

Anchorage, Alaska

Alaska Board of Fisheries – Bristol Bay Finfish Meeting

Madam Chair and Members of the Board,

My name is **Cameron Libby**, and I am a Set-Net Permit Holder fishing on Ekuk Beach in the Nushagak District of Bristol Bay. I have been actively fishing on Ekuk beach since I was born. My dad started fishing on Ekuk beach when he was 10 (1959) and my grandparents had been active in the Dillingham and Bristol Bay region for over 50 years with commercial fishing a big part of their lives. Commercial fishing has been an important part of our lives for 3 generations and we are in the process of passing it onto the 4th generation.

I submit this comment as a member of the Ekuk Beach Fishermen's Association (EBFA) and as someone whose livelihood and family depend on a safe, fair, and sustainable Bristol Bay fishery.

Allow the Nushagak Chinook Management Plan to Complete a Full Life Cycle

I support allowing the Nushagak Chinook Management Plan to work without preemptive alterations. Chinook are long-lived fish with a life cycle of seven years, and meaningful evaluation of conservation outcomes requires time and consistency. This plan was developed through a multi-year, Board-convened stakeholder process and adopted unanimously in 2023. Re-setting management in the middle of the Chinook life cycle creates instability for fishing families and undermines the ability to evaluate whether the plan is working.

Support for Proposal 56: Predictable Spatial Boundaries

I support Proposal 56, which would make Ekuk's coordinate-based offshore set-net boundary permanent. Adopted by the Board in 2022, this boundary has been working successfully as a clear, predictable, and enforceable seaward limit. Making it permanent provides certainty for set-net placement, drift operations, and enforcement in a high-density fishing area.

Support for Proposal 57: Orderly and Safe Fishing

I support Proposal 57, which establishes the same boundary as a shoreward limit for drift gear and prohibits contact with set-net gear. This proposal reduces entanglement risk, gear loss, and unsafe nearshore interactions by clearly defining spatial limits and updating set-net gear definitions. As the drift fleet has grown significantly in size and horsepower, these clear, enforceable rules are essential to maintaining an orderly and safe fishery.

Support for Proposal 80: Joint-Venture Set-Net Operations

I support Proposal 80, which allows limited joint-venture set-net operations under defined conditions. Joint ventures help small, family-based sites adapt to short openings, rising costs, and safety challenges without increasing fishing footprint or promoting consolidation. This approach has worked successfully in Kodiak set-net fisheries for over four decades.

Economic and Community Impacts of Missed Allocation

In recent years, set-net fishermen in the Nushagak District have consistently fallen far short of the Board-adopted 26% set-net allocation. These shortfalls, in harvest share and time, have real consequences for fishing families, local processing, and watershed communities like Ekuk. When allocation exists on paper but is not achieved in practice year after year, the economic and social fabric of Bristol Bay communities is weakened.

Together, these requests are important steps toward equitable harvest share in practice, not just on paper. Allowing the Chinook Management Plan to complete at least a full life cycle before considering alterations to the plan encourages participation and trust in conservation management; Proposals 56 and 57 reduce conflict and safety risks that disproportionately impact onshore set-net fishermen; and Proposal 80 provides limited flexibility for small operations to adapt to shortened and more complex fishing opportunities. These measures help ensure that set-net fishermen in the Nushagak District have a fairer opportunity to sustain our fishing families and watershed communities over the long term.

Thank you for your consideration and for your service to Alaska's fisheries and fishing communities.

Respectfully submitted,



Cameron Libby

[Redacted]

[Redacted]

Ekuk Beach, Nushagak District

Submitted by: Stephen Libby

EBFA

Community of Residence: Anchorage , Ak. /. Dillingham, Ak

As indicated above, I'm a lifelong resident of Dillingham with hands- on experience since 1959. I've had both drift participation as well as set net participation over the years. Currently my family continues to fish on Ekuk beach with my grandkids having the site leases and permits. An exciting legacy/ participation it's been for me to be a multigenerational participant!!

I support a full cycle Nushagak Management Plan as the best solution to arriving at the proper strategy for long term sustainability of all species. Abandoning this mud stream seems unwise to me!

I support Proposal 56! Adopted in 2022 by Board it's been working successfully. Suggest leaving this alone!

I support Proposal 57! This reduces entanglement risk, gear loss and unsafe near shore interactions by being definitive about spatial limits and gear definitions. Drift fleet has grown significantly in size and horsepower which requires clear rules of interaction.

I support Proposal 80! Joint ventures help small, family based adapt to short openings, rising costs, and safety challenges. For reference this has worked in Kodiak set- net fisheries for 40 plus years successfully!

Economic and Community Impacts of Missed Allocation!!

In recent years set-net fishermen in the Nush District have consistently fallen far short of Board adopted 26% set-net allocation! These shortfalls have heavily impacted fishing families, local processing, and watershed communities such as Ekuk. Keep in mind these missed numbers adversely affect LOCAL families as Ekuk is multigenerational in nature. Let's adhere to the allocations guidelines!!

Thank you for your service to fisheries and communities!

Respectfully submitted. Steve Libby

Alaska Board of Fisheries – Bristol Bay Finfish Meeting

Madam Chair and Members of the Board,

My name is Warren Libby, and I am a set-net permit holder of over 20 years fishing on Ekuk Beach in the Nushagak District. I submit this comment as a member of the Ekuk Beach Fishermen's Association (EBFA) and as someone whose livelihood and family depend on a safe, fair, and sustainable Bristol Bay fishery.

Allow the Nushagak Chinook Management Plan to Complete a Full Life Cycle

I support allowing the Nushagak Chinook Management Plan to work without preemptive alterations. Chinook are long-lived fish with a life cycle of seven years, and meaningful evaluation of conservation outcomes requires time and consistency. This plan was developed through a multi-year, Board-convened stakeholder process and adopted unanimously in 2023. Re-setting management in the middle of the Chinook life cycle creates instability for fishing families and undermines the ability to evaluate whether the plan is working.

Support for Proposal 56: Predictable Spatial Boundaries

I support Proposal 56, which would make Ekuk's coordinate-based offshore set-net boundary permanent. Adopted by the Board in 2022, this boundary has been working successfully as a clear, predictable, and enforceable seaward limit. Making it permanent provides certainty for set-net placement, drift operations, and enforcement in a high-density fishing area. Referencing changing geological markers (distance from beach, etc.) will become more problematic as erosion increases from rising sea levels and storms.

Support for Proposal 57: Orderly and Safe Fishing

I strongly support Proposal 57, which establishes the same boundary as a shoreward limit for drift gear and prohibits contact with set-net gear. This proposal reduces entanglement risk, gear loss, and unsafe nearshore interactions by clearly defining spatial limits and updating set-net gear definitions. As the drift fleet has grown significantly in size and horsepower, these clear, enforceable rules are essential to maintaining an orderly and safe fishery. We have damage to our gear on a regular basis due to irresponsible drift operators. It's as if someone has free access to use your personal property for their financial gain without any accountability for damage. There is no reason for drift operators to literally fish on our gear. Damage to our gear takes time, work, and money to repair and is tide dependent, meaning lost fishing time. There have also been boats that operate while tides ebb that end up inadvertently going dry right in the middle of our setnet operation. This obviously hampers our ability to operate. If boats are not allowed access shoreward of our gear, most of these issues would disappear.

Support for Proposal 80: Joint-Venture Set-Net Operations

I support Proposal 80, which allows limited joint-venture set-net operations under defined conditions. Joint ventures help small, family-based sites adapt to short openings, rising costs, and safety challenges without increasing fishing footprint or promoting consolidation. This approach has worked successfully in Kodiak set-net fisheries for over four decades. My

brother and I are 3rd generation set-netters. Our children are learning the operation. The magic of fishing for us is working together all season.

Economic and Community Impacts of Missed Allocation

In recent years, set-net fishermen in the Nushagak District have consistently fallen far short of the Board-adopted 26% set-net allocation. These shortfalls, in harvest share and time, have real consequences for fishing families, local processing, and watershed communities like Ekuk. When allocation exists on paper but is not achieved in practice year after year, the economic and social fabric of Bristol Bay communities is weakened.

Together, these requests are important steps toward equitable harvest share in practice, not just on paper. Allowing the Chinook Management Plan to complete at least a full life cycle before considering alterations to the plan encourages participation and trust in conservation management; Proposals 56 and 57 reduce conflict and safety risks that disproportionately impact onshore set-net fishermen; and Proposal 80 provides limited flexibility for small operations to adapt to shortened and more complex fishing opportunities. These measures help ensure that set-net fishermen in the Nushagak District have a fairer opportunity to sustain our fishing families and watershed communities over the long term.

Thank you for your consideration and for your service to Alaska's fisheries and fishing communities.

Respectfully submitted,
Warren Libby

Ekuk Beach, Nushagak District

Submitted by: Charles Lindsay

Community of Residence: Homer, AK

I oppose Proposals #44, 61, 62, 63, 64, 65, 66, 68, and 69 because similar management strategies in other areas (such as Area H) have failed to protect stocks of concern, while severely limiting commercial harvest and contributing to over-escapement. These approaches have not produced the intended conservation outcomes and have created unnecessary harm to fishermen.

I oppose Proposals #75, 76, 77, 78, and 80 because making it easier to stack permits disproportionately benefits wealthier permit holders, allowing consolidation at the expense of local fishermen and working families who depend on this fishery.

I oppose Proposals #82, 83, 84, 85, and 87 because we do not need to further incentivize bigger, longer boats in this fishery. These changes would increase costs, intensify effort, and further disadvantage smaller, local operators without clear conservation benefits.

Submitted by: Hayden Linscheid

Community of Residence: Kodiak Island, Alaska

The proposal I'd like to address the most is 61. It is unreasonable to ask the commercial fleet to sit down even more for kings. We have cut our king fishery out completely from 25 years ago. We sit down to let kings go up just for sport fisherman to use barbed hooks and catch and release until they catch the fish they desire. I'd like to see the sport fisherman step up and make some sacrifices. The sport fisherman harvested more kings then the whole commercial fleet in 2025.

I support stacking permits as in proposal 78. It's time to make the change as the fishery and boats fishing have changed. Allow permit stacking.

Submitted by: Aiden Long

Community of Residence: Palmer

I am opposed to proposals 44, and 61-68. I am specifically against hurting the commercial fishing industry when there is no sound proof against gillnetters majorly hurting king number in the Nushagak. I am an Alaska resident of 19 that has grown up sport fishing and commercial fishing. While gillnetters do have some bycatch, it's frustrating to hear sport fishermen talk about how we slaughter "there" kings. There is an ignorants in the sport/guide fishing community that does not understand how little we affected the kings. I am excited about the future of Bristol bay and see potential for young guys like me to make a living as residents. It is simply frustrating when the sport fishing community has the ability to hurt such a good opportunity when, like I said before, they are simply ignorant. Many things have affected the decline of kings in the last couple decades, change in spawning ground, water temperature, food, over and under escapement of all salmon species, invasive species, sport fishing, beavers, trawlers etc. I fished a number of high producing boat the last couple years in Bristol Bay fishing the Nush, and have seen a lot more king salmon killed by poaching on rod and reel behind my house. We call the

troopers and they never show up. The only time we can actually control what happens to our salmon is when they finally return to their spawning grounds and the state has not done a good job controlling it. In my perspective slowly shutting down the commercial gillnetters like this is a passive answer to what actually happening.

PC129

Submitted by: Douglas Long

Community of Residence: Palmer

I oppose proposal 61

Not allowing commercial fishing of sockeye salmon until June 28th, and only allowing 12 hours of fishing a day till July 4th, would cause over escapement of sockeye salmon, effecting the runs in a negative way in the future.

Approximately 7 million sockeye (35 million dollars at \$1.00 a pound) that would typically be harvested in the Nushagak, would be allowed to escape, which would be a huge loss that will affect all the commercial fisherman across Bristol Bay. Normally 600 (almost half) of the drift vessels in Bristol Bay, begin their season in the Nushagak and most of them would be forced to start in other districts.

The current Chinook management plan, though it is not desirable to the commercial fishing industry, has necessary sockeye over escapement triggers in the Wood and Nushagak rivers, to keep a sustainable sockeye run, and to keep the harvestable sockeye available to the fishermen.

PC130

Submitted by: Jeffrey Ludwig

Community of Residence: Bristol Bay Drift Fisherman residing in Washington State

Greetings Board Members. My name is Jeffrey Ludwig, and I am a Bristol Bay driftnet permit holder with 19 years of experience (8 as a crewmember, 11 as a vessel owner/operator).

I oppose Proposals 44 and 61–69 and urge the Board of Fisheries to leave the Nushagak District King Salmon Stock of Concern (SOC) Management Plan unchanged. The plan was adopted in 2023 following an extensive, science-based and stakeholder-driven process and has not been in place long enough to evaluate its effectiveness across a full Chinook salmon generation or the full range of run conditions. Prematurely restructuring the plan would reset the evaluation process, undermine stakeholder confidence, and reduce management flexibility before meaningful conclusions can be reached.

Available performance assessments indicate the current plan is functioning as intended by delaying openings, increasing king salmon passage, expanding in-season closures, and significantly reducing commercial fishing time. These are substantial conservation measures already in place. In addition, there remain legitimate concerns and uncertainty regarding the accuracy and precision of king salmon enumeration in the Nushagak. Making further structural changes based on limited time-series data and imperfect enumeration increases the risk of management error.

Proposals 44 and 61–69 would further restrict commercial fishing opportunity without clear biological justification and could result in significant losses of sockeye salmon harvest. From a biological standpoint, unnecessary restrictions increase the risk of sockeye overescapement, which can negatively affect future productivity and stock health. From an economic standpoint, these proposals threaten the

livelihoods of Bristol Bay permit holders, crew, processors, and the communities that depend on a stable and sustainable commercial fishery. The Board should allow the existing SOC Management Plan to remain in place long enough for a full, data-driven evaluation and oppose Proposals 44 and 61–69.

PC131

Submitted by: Joel Ludwig

Community of Residence: Arlington

Written Public Comment on Proposal #76

Permit Stacking

Submitted to the Alaska Board of Fisheries

Bristol Bay Finfish Meeting

Name: Joel A. Ludwig, S03T Permitholder and vessel operator (45 years in Bristol Bay fishery)

Date: 22 December 2025

I am writing to offer perspective on Proposal #76 regarding permit stacking. This proposal improves the existing dual permit system in several important ways, outlined below.

The current dual permit system serves to reduce the amount of gillnet gear deployed in the Bristol Bay salmon fishery. The nine-year average of dual permit operations is 371 vessels, which equates to 37,100 fathoms of gear removed from the water (100 fathoms multiplied by 371 equals 37,100 fathoms, or approximately 42.16 miles). This information is drawn from annual Alaska Department of Fish and Game (ADF&G) reports. This reduction benefits fishermen in several ways.

First, it provides flexibility for fleet size to expand or contract in response to market and fishery conditions. Additionally, it offers a means to achieve the optimal number of drift vessels—between 900 and 1,400, as identified by the Commercial Fisheries Entry Commission (CFEC)—without implementing a buyback program.

Second, permit stacking, in which a single operator fishes two permits using 200 fathoms of gear, provides stability and financial security for fishermen making long-term investments in dual permit operations.

Third, reduced gear and vessel numbers may help improve ex-vessel prices, as processors must compete to secure deliveries from a smaller fleet.

Fourth, there is potential for increased fishing opportunity due to reduced overall gear and fleet congestion.

Finally, a less congested fishery can also lead to improved fish quality standards.

Additionally, the Performance Assessment of the 2023 Nushagak District King Salmon Stock of Concern Management Plan, prepared by the Bristol Bay Science & Research Institute, identifies “fishing effort (number of permits, boats, sites)” as one of several factors affecting king salmon conservation. Vessels operating under a dual permit system can play a meaningful role in reducing the total amount of gear available to harvest king salmon.

I would also like to address potential opposition to Proposal #76. One concern may be that permit values could increase if the proposal passes, potentially limiting entry opportunities for new participants.

However, Bristol Bay permit values have historically fluctuated widely, ranging from highs of approximately \$275,000 (prior to the implementation of the dual permit system) to lows of around \$17,000. Permit values will continue to fluctuate based on both biological and economic conditions within the fishery.

Moreover, there are multiple avenues of financial assistance available to prospective entrants, including the Bristol Bay Economic Development Corporation's Permit Loan Program, Alaska State loan programs, NOAA/NMFS programs, processor financing aimed at securing future fleet participants, and conventional commercial lenders.

Finally, the CFEC 2024 Annual Report notes that the aging of the fleet has resulted in the average age of participants increasing from 46.4 years to 53 years. This trend suggests that, in the coming years, additional permits are likely to become available as current participants retire or otherwise exit the fishery, potentially increasing opportunities for new entrants.

Respectfully submitted,

Joel A. Ludwig

PC131

Submitted by: Joel Ludwig

Community of Residence: Arlington Wa

Approve proposals 71-74

The positive effects of these proposals are as follows;

Eliminates illegal fishing

Creates more opportunity for fleet

Creates more opportunity for Local Watershed Fleet

Provides more resource to Large, Medium, & Small Processors

Improves Quality of Harvest

Spreads out fleet, which might help with Marine Mammal Damage

Generates more State & Local Taxes

PC131

Submitted by: Joel Ludwig

Community of Residence: Arlington

Approve proposal 83

Approve for the following reasons;

Safety (Vessel with Slack tanks is very dangerous)

Quality of Product (With new technology of refrigeration, bigger vessels will be needed)

Older vessels could get new life and increase Quality & Production

By approving this proposal' vessels will be safer, more efficient and will increase the value of the resource. which is in everybody's interest.

PC132

Submitted by: Steven Ludwig

Community of Residence: Silvana, Wa.

I'm in opposition to proposals 44, 61-69. I would urge the Board of Fisheries to leave the Nushagak king salmon management plan as is. The current plan was implemented in 2023 and in that time frame it would be to soon to come to conclusion on the effectiveness of it. We are fortunate to have one of the largest sockeye salmon runs in the world and hopefully we can continue to harvest and maintain the fishery to the fullest extent allowable without jeopardizing the current status.

PC133

Submitted by: Stephen Maher

Community of Residence: Asheville, NC

I am commenting on proposals 44, 55, 57, 61-69, 71-74, 75-78, 81, 82-91

I am opposed to any changes in the king salmon stock of concern management plan right now. The current plan has not been in place long enough to determine its effectiveness. I am opposed to sport fishermen tweaking a plan for their own benefit, and not the resource.

I am opposed to opening up the East Side General District late season. I think it would be unsafe.

I am opposed to allowing single owner permit stacking. I like the parity individual owners bring to the fishery.

I am opposed to set net fishermen at Ekuk having any kind of exclusion zone. It would not be fair or in the spirit of this fishery.

PC134

Submitted by: Casey Marinkovich

Community of Residence: Washington State

To the Alaska Board of Fish,

My name is Casey Marinkovich and I have been commercial fishing in the state of Alaska since I was ten years old and have fished in Bristol Bay since 2020. I strongly oppose proposal 44 & 61 through 68. Changes in this plan before it comes to its full fruition could undo years of collaborative work made by the fishing community including commercial, sport, and subsistence fishermen. I want to be able to commercial fish for a long time and I fear that altering this plan might affect my future in this industry. I respectfully request the Board allow the plan to be unchanged. Thank you for your consideration and time.

Best,

Casey Marinkovich

Fred Marinkovich

[REDACTED]
Gig Harbor WA 98329

United States
[REDACTED]
[REDACTED]

December 15, 2025

Board of Fish, Alaska State Troopers

I would like to bring attention to some inappropriate fishing practices that came to my attention this past 2025 season in Bristol Bay.

While fishing in the Naknek/Kvichak district last season I witnessed fishing vessels round hauling their gear (bringing their nets aboard over the stern/bow roller with fish in it, and pilling it on the stern/bow) with up to as many as 1000 fish in it. This method of harvesting takes place when boat are possibly drifting over district lines, or losing water on the ebbs with fish in their nets. This method of harvesting is, and has always been part of the Bristol Bay fishery. I do not have a problem with that.

What I do have a problem with, and what I do believe needs to be addressed is: After some of these boats round haul their nets with loads of fish in them, they run back into the district, or into deeper water, and set their full nets back out into the water with dead fish in them. I believe this is done because it is easier and faster for some fishers to clean their nets by picking them on the drum, rather than the traditional method of cleaning their gear. Watching these fish getting beat up and flying out of the gear as they are getting re-set over the stern/bow roller is something I've never before witnessed in my 50 years of fishing, and would hope it would not become a normal fishing practice.

I don't know if the BOF can take any action on this, or if this is something that the Troopers need to address? I do know that if the proper language is not installed to put a stop to this activity, it will simply keep happening.

Thank you for time, Fred Marinkovich

Submitted by: Fred Marinkovich

Community of Residence: Washington

Board,

My name is Fred Marinkovich, I have been a stakeholder in the Bristol Bay Salmon fishery for over 50 years.

I would like to OPPOSE Proposals 44 & 61-68.

There was a lot of time and effort involved in putting together the current Nushagak District King Salmon Stock of Concern Management Plan.

I do not believe we have given this current plan enough time to evaluate how it is working.

Please keep the current Nushagak King Salmon Stock of Concern Management Plan in place, with no changes. Thank you for your time,

Fred Marinkovich

Submitted by: Mason Marinkovich

Community of Residence: Washington

To whom it may concern,

I have been a permit holder in Bristol Bay for 10 years. I oppose proposals 44 and 61-68. The current fishery plan should remain unchanged. Not enough time has elapsed to determine if the current plan is effective.

Submitted by: Matt Marinkovich

Community of Residence: FRIDAY HARBOR, WA

Hello BOF staffers and organizers

Thank you for all the work you do putting together the BOF meetings, and compiling these comments. I'm not sure if I submitted my comments in the most efficient way, but I said my piece where necessary (in other submissions), and I appreciate the opportunity to do so.

On this submission I am simply electing "support" or "oppose" on proposals which I have not yet commented. I have no specific comments on these proposals.

Thank you

--Matt Marinkovich

Submitted by: Matt Marinkovich

Community of Residence: FRIDAY HARBOR, WA

I support Proposal 91, suggesting horizontal surfaces be allowed on outdrive guards.

I am the author of this proposal. The intent and purpose of this regulation is completely for safety. Most every outdrive guard already has horizontal surfaces affixed upon them; this proposal would clarify these are allowed for safe human access to the outdrive.

Thank you for your thoughtful consideration regarding this important concern.

Sincerely,

Matt Marinkovich

ALSO, Please see attached for comments on proposal #81, of which I am opposed.

Thank you

--Matt Marinkovich

I am the author of Proposal 95, and I am in support of this proposal.

I have greatly condensed and clarified the explanatory section of Proposal 95 (see below). I realize the version I submitted was confusing and too long. I would appreciate if this version were considered throughout the meeting process.

My suggested regulation modifications are unchanged, except for a clerical error I found in my proposed language, 06.37(b)(2), which I corrected.

My intention for this proposal is absolutely for the purpose of safety among the drift gillnet fleet. Every year I see captains, crews, and vessels go to sea unprepared for the season, because they do not adequately test-run their equipment/crew in the early season. I believe this proposal will create an opportunity for better preparedness by many fishermen who are now neglectful, and who go to sea with underprepared crews, and unseaworthy vessels.

Please read this more concise version of Proposal 95, and please consider entering this into regulation.

Sincerely,
Matt Marinkovich

PROPOSAL 95 *(condensed and clarified)*
5 AAC 06.370. Registration and reregistration.
 Modify early season registration requirements, as follows:

Change 5 AAC 06.370 to read as follows:

(a) Before taking salmon in the Bristol Bay Area, a CFEC salmon drift gillnet permit holder shall register for a district described in 5 AAC 06.200. Before taking salmon in the Nushagak District, a CFEC salmon set gillnet permit holder shall register for a statistical area described in (l) of this section. A CFEC salmon drift gillnet permit holder also shall register for the same district the drift gillnet vessel that the permit holder will be operating. For the purposes of this section, a CFEC salmon drift gillnet permit holder and a drift gillnet vessel may be registered in only one district at a time and a CFEC salmon set gillnet permit holder in the Nushagak District may be registered in only one statistical area at a time. Initial district registration and statistical area registration is accomplished by completing a registration form provided by the department and returning the completed form to the department office in Dillingham or King Salmon or electronically on the department's website.

(b) Except when fishing as a crewmember, a CFEC salmon drift gillnet permit holder intending to transfer to and fish in a new district for which the permit holder is not registered shall register the permit holder and the vessel that the permit holder will use to take salmon for the new district at least 48 hours before fishing in the new district. Reregistration **or unregistration** is accomplished by the permit holder or the permit holder's authorized agent completing a form provided by the department and submitting the completed form, in person, to a local representative of the department or electronically on the department's website. The 48-hour district transfer notification period starts when the reregistration **or unregistration** form is

signed by the local representative of the department or when the permit holder receives the computerized acceptance notification. The drift gillnet permit holder and the drift gillnet vessel may not fish in the original district during the 48-hour notification period. The notification period may be reduced by commissioner's announcement. District reregistration is not required after 9:00 a.m. July 17, except in the Ugashik District, as specified in 5 AAC 06.366(d)(4), the Naknek-Kvichak District, as specified in 5 AAC 06.360(g), and the Egegik District, as specified in 5 AAC 06.359(f).

06.37(b)(1): Except when fishing as a crewmember, a CFEC salmon drift gillnet permit holder intending to transfer to and fish in a new district for which the permit holder is not registered, **or intending to unregister the permit**, shall register the permit holder and the vessel that the permit holder will use to take salmon for the new district at least 48 hours before fishing in the new district, **or before unregistration takes effect**.

06.37(b)(2): Prior to 9:00 a.m. June 25, except when fishing as a crewmember, a CFEC salmon drift gillnet permit holder may elect to unregister their permit, by which they are not transferring to a new district, nor shall they remain eligible to fish in their existing district; rather the transfer shall unregister their permit from fishing in any district. Effective after the 48-hour district transfer notification period, the permitholder may again register their drift permit as described in 06.37(a).

06.37(b)(3): Reregistration **or unregistration** is accomplished by the permit holder or the permit holder's authorized agent completing a form provided by the department and submitting the completed form, in person, to a local representative of the department or electronically on the department's website. The 48-hour district transfer notification period starts when the reregistration/**unregistration** form is signed by the local representative of the department or when the permit holder receives the computerized acceptance notification. The drift gillnet permit holder and the drift gillnet vessel may not fish in the original district during the 48-hour notification period. The notification period may be reduced by commissioner's announcement. District reregistration is not required after 9:00 a.m. July 17, except in the Ugashik District, as specified in 5 AAC 06.366(d)(4), the Naknek-Kvichak District, as specified in 5 AAC 06.360(g), and the Egegik District, as specified in 5 AAC 06.359(f).

What is the issue you would like the board to address and why?

When a Bristol Bay drift permit holder renews their permit, it starts out as unregistered, and stays that way until it is registered to fish in a fishing district.

Once a Bristol Bay Drift permit holder registers their permit to fish in any district, they are not allowed to unregister their permit. This means their permit must remain registered in one of the fishing districts, or be waiting through a 48-hour transfer period, for the entire season, until ADFG waives the transfer period at the end of the season. There currently is no way for a permit holder to unregister their permit once it has been registered.

An unregistered permit is perceived as advantageous to many drift gillnet fishermen because they can wait until it is blatantly obvious (due to large fish volumes in a fishing district) as to

where they may want to start their fishing season. For this reason many fishermen wait to register their permit until late in the season.

Starting late in the season, without a proper vessel “shakedown” or hands-on crew training, is unsafe for many reasons. Unfortunately, for the reason stated above, many fishermen make this their common practice.

This proposal offers a solution that will allow late-starting fishermen a chance to test-run their vessels in the early season, yet still maintain their perceived late-start advantage. This will lead to greater safety in the fishery.

The situation as it currently exists:

If a permit holder wants to immediately start fishing in a fishing district, they have to keep their permit unregistered until they choose to fish. Many fishermen wait until there are abundant fish in the district they choose to fish, before they register their permit. This often means the vessel and crew have a hurried and unprepared start to the season, which can lead to unsafe vessel operations, and under-trained (and unsafe) crew members.

Situation if this proposal were enacted:

A drift permit holder who registered their permit to fish in a Bristol Bay regulatory area (besides Togiak) may elect to unregister their permit, provided this choice is made prior to 9:00 a.m. June 25. If they choose to unregister their permit, they must stand down from fishing for a 48-hour period. After the 48-hour waiting period, their permit will again be unregistered. This unregistered permit can then be registered in any fishing district (besides Togiak) and the permit can start fishing immediately after registering.

This proposal allows fisherman time to field-test their boat and “break in” their crew before heavy fishing. It will reduce the risk of injury or catastrophic incident by allowing “first-opening problems” to be encountered and addressed in a stress-free state of mind, in good weather, and with no dramatic profit-driven variables in play.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? This proposal was developed in cooperation with ADFG biologists.

PROPOSED BY: Matt Marinkovich

VESSEL LENGTH PROPOSALS

I am in support of proposals 82-91, all of which deal with vessel length (I am the author of Proposals 84 and 91). Technology and ingenuity have advanced over these years, but the regulations haven't. While no single proposal from this slate is likely to be the best solution, it is clear there is a problem that must be corrected at the 2026 BOF.

ADFG Enforcement has clearly stated they would like an *enforceable* regulation regarding length. All 10 of these regulations seek to clarify the currently vague definitions that has led to the confusion regarding vessel length and its enforceability.

These regulations were modified first in 1981, then nine years later in 1990, then eight years after in 1998. It is now 2025, and **it has been 27 years since the last modification to 5 AAC 06.341**. Since AAC 06.341 was first written, vessel design has evolved dramatically. It is time for a **regulation that encompasses all of the previously-allowed modifications**, yet is easy to enforce going forward.

No fisherman would intentionally violate the length limit; any current violation is a result of a past vessel builder believing they were within the regulation because of the interpretation of this vague rule. Builders certainly verified their idea through enforcement, but now these rules are under scrutiny because enforcement seems to be viewing things from a different perspective. A length-of-hull increase will be the most simple modification to clarify the regulation. Plus, it will allow for **safer** and **more efficient** vessel designs.

Vessels currently under length-scrutiny are owned by all sectors of the Bristol Bay fishing community; those from within the watershed, within the state of Alaska, and those from the lower-48 and beyond. A sound and fair clarification of this regulation will benefit all Bristol Bay fishermen.

Please, Board of Fish members, use sensible consideration in resolving this contentious issue. Thank you for your thoughtful consideration on this important matter.

Sincerely,
Matt Marinkovich

I support Proposal 84, suggesting a 26-inch increase in boat length to 34'2" total, exclusive of outdrives and outdrive guards.

I am the author of this proposal and offer new information to clarify the intent of this proposal.

32' is the current limit the hull of a vessel. An additional 18" is allowed for a non-buoyant trim tab (on the stern of the vessel), and an additional 8" for a non-buoyant anchor roller (at the bow). These already-allowed length-additions total 26", which is the basis of my proposal.

My proposal does not consider length added to a vessel by the outdrives or out-drive guards as a length consideration, which vary in length depending on the type and manufacture of the propulsion unit. These are already defined by regulation as an operational component that does not provide floatation or planing surface.

This proposal would eliminate confusion concerning the definition of a non-buoyant outdrive (externally-mounted propulsion unit), and the fact a jet propulsion unit, which starts within the hull and then extends beyond the transom, has negative buoyancy in the portion within the vessel's hull. To counter this negative buoyancy, builders added a box of up to 4", which extends beyond the transom of the vessel. The interpretation at the time qualified this construction method; it was built on a number of vessels, and seemed to be the industry standard. Now this same building design is up for speculation.

This proposal would allow for this type of jet installation. If there is no consideration towards this arguably-allowed design, the result would be a severe vessel modification, which would most likely result in removing length from the bow of the vessel. This would severely impact the safety of the vessel when in heavy seas, as the diminished wave-cutting action of the bow may result in "blowing out" forward-facing windows of the vessel. This could result in a total loss of the vessel, and loss of life at sea.

This proposal will also eliminate the need for mention of trim tabs, stern rollers, and mechanical equipment mounted outside the transom, which is also currently a point of confusion surrounding enforcement of the 32' limit.

Thank you for your thoughtful consideration regarding this important concern.

Sincerely,
Matt Marinkovich

I am opposed to Proposal 81, which would allow fish traps in Bristol Bay.

Fish traps were outlawed in Washington and Oregon in 1934-35, and Alaska in 1955 and 1959 (after statehood). They were banned for economic reasons—A fish trap can catch ALL the fish, so there is no need for a fishing fleet. Russia (a communist nation) uses fish traps extensively to catch salmon, and has no commercial salmon fleet of gillnet or purse seiners.

Use of fish traps in Bristol Bay would destroy the fishing economy of the region. It would consolidate all the fish-catching to the processor, and they would not need a fishing fleet. I could write 10 pages of the devastating effects of this for economic reasons.

Our fleet of drift gillnet boats would become useless. Only the permit holders would benefit, and would likely wind up becoming consolidated, because the person attached to the permit wouldn't be necessary.

Use of fish traps would also eliminate salmon advocacy. It would eliminate salmon fishermen, and thereby it would eliminate those who care about salmon, which would open up the region to other industries like the Pebble Mine.

No, no, no. For a MILLION reasons, NO FISH TRAPS.

Thank you

Sincerely,
Matt Marinkovich

I am opposed to Proposal 92, which would close the Naknek Kvichak district on July 25.

The late season sockeye run, in all districts, lasts into mid-August. While the majority of the sockeye run has passed, there are pulses of fish that provide good fishing opportunity to the few fishermen who choose to fish late.

Silver Bay Seafoods (SBS), a major processor in Bristol Bay, quit buying fish in the Naknek district in recent years, as follows: July 25 in 2022; July 29 in 2023; July 31 in 2024; and July 25 in 2025. SBS not buying indicates there's not much out there, and most of the fleet will be off the water by then. With this as an indication, there is scarcely a reason to enforce a hardline closure by regulation.

Shutting down an entire district, especially the district in which the majority of late-season processors operate, could lead to an earlier shutdown of a company's entire Bristol Bay buying operation. A company's decision to continue processing depends on the number of boats fishing (and fish-volumes caught) to make their operations feasible. Most of the drift and setnet fleet wrap up their season by July 20, so the daily processing volume is already greatly reduced; losing an entire fishing district's catch would greatly impact the decision to remain in business.

This proposal depends on pure speculation that the small commercial effort at the end of the season is harming the silver run. Perhaps the silver run is being impacted by seal predation, rather than late-season gillnets? Both sport and commercial fishermen would agree there is a significant problem with seal predation—there are more seals now than ever before. How about a study exploring this idea?

This proposal needlessly pits the sport and commercial fishermen against each other. It is a shallow-minded argument, and would do very little to change the health of the Naknek silver run.

Sincerely,
Matt Marinkovich

I am opposed to Proposal 44, which would require a limit and “punch-card” reporting for king salmon caught by area T subsistence and commercial fishermen

There are many reasons why this is a bad idea:

- 1) Commercial fishermen own a permit which allows them to catch fish without a limit. So long as any king salmon caught (either sold or retained) are recorded on the fish ticket at the point of landing, it really doesn't matter how many king salmon are retained for personal use. The only difference is who gets the king salmon—the processor (if sold) or the fisherman (if retained).
- 2) We eat a lot of fish when we are fishing commercially in Bristol Bay. Suppose we caught a king salmon every day (which we don't); we could eat a king salmon for dinner only 12 times during our 40-day season. Sockeye is a great replacement, but does it really matter if we eat more than 12 king salmon? We're catching them anyway...
- 3) PAPERWORK... How much paperwork can we create for no reason? Who is going to pay for all of this paperwork and data processing? Perhaps AK Salmon Camp, inc is offering to pay the bill?
- 4) RETAINED fish has long been a way for commercial fishermen to bring fish home for dinner. It is not an abused system—nobody is scamming anything or selling fish on the black market. And most of the “homepack” fish I see are sockeye, because they are plentiful and easy to catch. So why create hassle and paperwork for no reason?
- 5) Every and any king salmon a commercial fisherman wants to retain for consumption AFTER the season must be held in a freezer somewhere. This means the fish must be somehow transported to a freezer on land, since there is usually not a freezer on the boat. There is a lot of logistics just to homepack a king salmon. It might happen with a few fish, but it is likely not more than 12 king salmon, which is quite a bit of fish! Again, this proposal seeks to address a problem that doesn't exist.
- 6) SUBSISTENCE PUNCH CARDS? Really? Again, how much paperwork can we create? Subsistence fish are already recorded, why do a punch card? And are we really suggesting to limit subsistence catch?

There are more reasons why this is a bad idea, but you get the idea. There are a LOT of reasons why this proposal should not pass. Please do not support this proposal—it is a bad idea.

Thank you for your time in being on the Board of Fish

Sincerely,
Matt Marinkovich

I am opposed to Proposals 61-69, which deal with the Nushagak King Salmon Management Plan.

The main reason for my objection is because the management plan in place has not been around long enough to have attained its targeted data collection. Any change to the plan will “reset” the data by changing the parameters or objectives. Please allow the management plan to be in place for a full life cycle of the king salmon. It will give good baseline data that will help in the future.

Toward the purpose of consistency, I oppose Proposal 67, which seeks to close sport fishing if the king salmon stocks are critically low (this seems to make sense—I wish they would have thought about it in the first place). Again, this would change the data, and would taint the science behind the plan.

Please follow through on the original, well-thought out plan, which is balanced and fair to all users. Please do not alter the Nushagak King Salmon Management Plan.

Sincerely,
Matt Marinkovich.

I support a version of Proposal 50, with amendments, as follows:

The author of Proposal 50 suggests to create “**06.335(e): The department shall strive to manage the Bristol Bay commercial salmon fishery for the highest level of product value with a minimum of waste.**”

I would like to offer this amendment to this proposal:

06.335(e): The department shall strive to manage the Bristol Bay commercial salmon fishery with a minimum of waste.

(1) Any fish brought aboard a set or drift gillnet vessel shall not intentionally remain enmeshed within the gillnet when the net is again deployed into the water.

I am proposing this language because of what I witnessed this (2025) season in the Bristol Bay drift gillnet fishery. I watched drift fishermen (several different fishermen on different occasions) haul their nets aboard with fish in them, onto their decks (“stern haul” style), or onto their net reels (with fish still in the net), and then instead of taking the time to pick the fish out of their net before re-setting the net, they made no effort to pick the fish, but rather set their net back out with fish still in the net (in one instance, there were very many fish held in approximately 75 fathoms of net that they had to haul “stern-haul” style so they would not drift over the line—they set it back out with fish still in the net, likely because it was the quickest way to get their net back into the water; they had no concern for wasting the fish that were lost from their net). This is blatant waste of the resource, as many of these fish fell out of the net when the net was re-set. It also is blatant quality degradation, as those fish would have “gone through the ringer” if they made it back to the boat to be later sold into the market.

I left out mention of quality in my proposed language because of its subjective nature. Simply stern-hauling fish aboard a boat has little-to-no quality impact on the fish, if it is done with thoughtful consideration toward quality. Contrarily, very long sets (over three hours in the water), or hard towing of a gillnet, or towing a gillnet full of fish over a sandbar or across a mud flat, are all quality-degrading drift fishing techniques that nobody is bringing forward to ask for preventative regulation. Quality demands should be and are originated from the processors, and should not be administered through regulation.

Please accept this amendment to Proposal 50. It is important to stop this wasteful practice of intentionally setting a net with fish still enmeshed within the net. There was no accident in what I saw—these fishermen did this because it was the fastest way to return their nets into the water to catch more fish. If there is no ramification for this practice, it will continue, and so will this shameful waste of our resource.

Thank you for your consideration of this important concern.

Sincerely,
Matt Marinkovich

I support proposal 53, which utilizes the western SHA boundary line in Egegik to deter illegal fishing in the late season.

I am the author of this proposal.

Once again, Egegik had boats fishing over the northern boundary line in the late season. Perhaps there weren't the number of calls with complaints as the year before, because the fishery remained open despite this illegal fishing. Maybe those who called in 2024 didn't want to be responsible for shutting the down the whole Egegik district because they reported illegal fishing?

Proposals 71-74 all suggest opening the General District (opens up the entire east side, without boundary lines). All four of these proposals cite this as necessary **because of illegal fishing in Egegik.**

It is blatantly apparent there is a problem with late-season illegal fishing in Egegik. The General District will work to eliminate illegal fishing at the Egegik north line, but it is quite apparent that ADFG and other interests are not interested in opening the General District (the General District discussion at the 2023 BOF meeting was very short; there was no discussion, just agreement by the BOF that the General District should not be utilized).

This proposal offers a localized solution that will stop illegal fishing at the Egegik northern boundary line, because it will eliminate the north line. If fishermen want to fish in Egegik, they can fish up in the district. The SHA west line makes Egegik smaller, but with the little number of boats fishing in the late season, there is still plenty of room to fish.

Thank you for your consideration, and thank you for standing on the Board of Fish.

Sincerely,
Matt Marinkovich

I am opposed to Proposal 92, which would close the Naknek Kvichak district on July 25.

The late season sockeye run, in all districts, lasts into mid-August. While the majority of the sockeye run has passed, there are pulses of fish that provide good fishing opportunity to the few fishermen who choose to fish late.

Silver Bay Seafoods (SBS), a major processor in Bristol Bay, quit buying fish in the Naknek district in recent years, as follows: July 25 in 2022; July 29 in 2023; July 31 in 2024; and July 25 in 2025. SBS not buying indicates there's not much out there, and most of the fleet will be off the water by then. With this as an indication, there is scarcely a reason to enforce a hardline closure by regulation.

Shutting down an entire district, especially the district in which the majority of late-season processors operate, could lead to an earlier shutdown of a company's entire Bristol Bay buying operation. A company's decision to continue processing depends on the number of boats fishing (and fish-volumes caught) to make their operations feasible. Most of the drift and setnet fleet wrap up their season by July 20, so the daily processing volume is already greatly reduced; losing an entire fishing district's catch would greatly impact the decision to remain in business.

This proposal depends on pure speculation that the small commercial effort at the end of the season is harming the silver run. Perhaps the silver run is being impacted by seal predation, rather than late-season gillnets? Both sport and commercial fishermen would agree there is a significant problem with seal predation—there are more seals now than ever before. How about a study exploring this idea?

This proposal needlessly pits the sport and commercial fishermen against each other. It is a shallow-minded argument, and would do very little to change the health of the Naknek silver run.

Sincerely,
Matt Marinkovich

I am opposed to Proposal 48, which seeks to establish a 2:1 driftnet/setnet ratio in the Kvichak River Special Harvest Area (KRSHA).

I have been a drift net fisherman, fishing primarily in the Naknek/Kvichak district, for over 35 years.

This proposal depends greatly on supposition and conjecture. I have fished in the Naknek River Special Harvest Area (NRSHA) through the years referenced in the proposal; every year is a different experience—there is no way of accurately predicting what will be the situation of the drift and setnet fleets, and the decisions they make if or when the KRSHA is employed.

The 3:1 ratio is tested and has proved effective in the NRSHA. In fact, this proposal's author states that he authored the 2006 proposal that created the 3:1 opening, because the set netters sat out for 9 tides in 2005. By my recollection, 2005 had a huge lull in returning fish right in the middle of the season—there were no fish to catch, which might be why the set netters did not fish for so long. Had the set netters been trying to catch their allocation during the lull they may have gone 4 or 5 openings before the drift netters fished...

I am not comfortable with using wild guesses and conjecture as a baseline of fact. The 3:1 ratio has worked with the NRSHA, and if we ever (unfortunately) are forced to fish in the KRSHA, we will find out if the 3:1 rotation is effective there as well.

REGARDING the author's suggestion it would be more helpful to the drift net fleet if the setnet buoys were removed for the drift fleet; I disagree. When fishing in close-quarters situations like a special harvest area, obstacles create opportunity. As a drift netter I would prefer to have the set net buoys in place out to 500-feet, rather than having them removed.

I clearly see this proposal as an attempt to shift fish-catching opportunity from the drift net fleet to the set net fleet, without a solid basis as to why it should be that way.

Thank you for your consideration in this important matter.

Sincerely,
Matt Marinkovich

I am opposed to Proposal 49, which seeks to establish a variable ratio of setnet/driftnet fishing opportunity in the Kvichak River Special Harvest Area (KRSOA).

I have been a drift net fisherman, fishing primarily in the Naknek/Kvichak district, for over 35 years.

The author of Proposal 49 mentions the 84:16 split, citing how even though the set netters are allowed more fishing time, the drift netters still catch more fish. This is because a drift net vessel is not confined to the riverbank, and can venture out to where large bodies of fish are entering through the middle and further reaches of the district, over 10 miles downstream from the set netters.

If the Kvichak River Special Harvest Area (KRSOA) is employed, the whole drift fleet will be stuffed into basically the same area where the setnet fleet fishes—there is scarcely enough room for the whole drift net fleet, plus we are fishing only 75-fathoms or our normal 150 to 200 fathom complement of gear. More than half of the drift net fleet would normally be over 10 miles south and catching an entirely different body of fish, so the competition for fish in the KRSOA has doubled, with less than half the net.

The above considerations reflect why there is a 3:1 ratio between drift/set net fishermen. And no matter how many drift vessels or permits are participating in the fishery, the drift fleet will catch the same amount of fish; there is never enough room in a Special Harvest Area. Also, most of the fish in the area will be caught during a drift opening. This means there is a limited number of fish that the same number of boats will be catching. It will actually be HARDER for the drift fleet to catch their 84% of the allocation, so the 3:1 ratio is important to maintain.

OTHER POINTS TO PLEASE CONSIDER:

This proposal focuses only on the number of driftnet permits that are registered to fish to determine the variable drift/set openings. Why is there no consideration for the number of setnet permits participating in the openings? Surely, with this would factor into the resulting 84:16 allocation split.

Also, the proposal focuses on the number of drift permits registered, and not the number of drift vessels. Many of the vessels would be fishing a D permit, but every vessel would fish the same 75-fathoms of gear, regardless of how many permits are registered to the vessel. So linking the variability factor to the permits is unreasonable.

I see this proposal, like Proposal 48, only as an opportunity to shift fishing opportunity from the drift fleet to the setnet fleet, without a foundation of fact or sensible reasoning.

Thank you for your consideration in this important matter.

Sincerely,
Matt Marinkovich

Submitted by: Pepper Marinkovich

Community of Residence: Tacoma, WA

Oppose Proposals 44, 61-68.

Submitted by: Jon Markey

Togiak River Lodge

Community of Residence: Jasper, Georgia

the proposal submitted by Togiak River Lodge is very straightforward and eminently logical and would have no negative impact on the fishery.

Submitted by: Rex Martin

Community of Residence: Danvers, MA USA

Proposal 102 seeks minor, pragmatic adjustments to sport fishing regulations in the Togiak River drainage, emphasizing enforceability and alignment with fish behavior without undermining core conservation measures for king salmon (Chinook). These changes are low-risk, supported by biological data, and fit within the Alaska Board of Fisheries (BOF) adaptive management process. They enhance compliance and recreational access while maintaining protections for a stock of concern.

King salmon in the Togiak River remain a "stock of management concern" due to persistently low returns, leading to the 2023 BOF closure of the river to all king salmon fishing year-round (no retention allowed, with mandatory immediate release). [newsrelease.adfg.alaska.gov](https://www.adfg.alaska.gov/newsrelease)

Proposal 102 does not challenge this; instead, it proposes allowing bait (e.g., prawns) from July 11 (vs. current July 16) to target sockeye salmon, which have robust runs—the 2026 Bristol Bay sockeye forecast is strong, with escapement goals frequently met in the Togiak District. [adfg.alaska.gov](https://www.adfg.alaska.gov)

By mid-July, most kings have migrated upstream to spawn, reducing incidental bycatch risk, especially with existing rules requiring unbaited, single-hook artificial lures/flyes year-round outside bait periods. [adfg.alaska.gov](https://www.adfg.alaska.gov)

The boundary adjustment—from Gechiak Creek (mid-lower river) to the Pongo River (an upper tributary)—shrinks the open area for king targeting, better protecting spawning grounds. Radio-tagging studies show 84% of kings spawn in the mainstem Togiak River, with many in upper reaches above Pongopukepuk, and tributaries accounting for ~15%. fishwithjd.com

This move aligns regulations with actual spawning distribution and angler practices, as the river's remote, braided nature makes the current Gechiak boundary hard to enforce in the Togiak National Wildlife Refuge. aws.state.ak.us

These changes support multi-user fisheries (sport, subsistence, commercial) in Bristol Bay, where salmon sustain ecosystems and economies (~1-2 million returns annually). [adfg.alaska.gov](https://www.adfg.alaska.gov)

By making rules more enforceable, it could reduce violations and aid Alaska Department of Fish and Game (ADF&G) monitoring via aerial surveys. researchgate.net

Under Alaska Administrative Code (5 AAC), BOF proposals like this enable data-driven tweaks to sustain fisheries amid challenges like climate change (e.g., warmer waters affecting kings). akleg.gov

Proposal 102 is "clean and common-sense," as described, and its adoption could model effective advocacy—practical, targeted, and rooted in science.

PC142

Submitted by: Scott Martin

Community of Residence: Petersburg

To the members of the board,

My Name is Scott Martin. I am a resident of Petersburg, AK and I am an owner/operator of a drift gillnet boat in Bristol Bay.

I would like to voice my opposition to proposals 61 and 62. I believe that we need to give the current king salmon management plan more time to prove whether it is working or not before making such drastic changes.

The plan has only been in place for three fishing seasons and was not expected to produce immediate biological recovery given the 4–7 year life cycle of Chinook salmon.

Available analyses indicate the plan is functioning as intended by delaying commercial openings, reducing fishing time during peak Chinook vulnerability, reducing exploitation of king salmon in the commercial fishery, and increasing escapement prior to harvest exposure.

I believe the board should also consider the potentially harmful impact of largely over escaping the nushagak watershed with sockeye salmon.

Thank you for taking the time to read this, Scott

PC143

Submitted by: Vanessa Martin

Community of Residence: Petersburg, Ak

My name is Vanessa Martin, I'm a 28 year old Alaskan Resident and I've slowly worked my way into owning a boat and permit in Bristol Bay. (F/V Kamanu). I oppose the Proposals 61 and 62. The plan has only been in place for three seasons and was not expected to produce immediate results given the 4–7 year life cycle of Chinook salmon. I believe we should let it play out and give it a chance to do something before we change it up again.

I also think that we need to think about the sockeye run. If we let the sockeye way over escape and they don't have enough room to spawn the sockeye run could take a huge hit and it could take decades to recover from that. Please consider opposing these proposals. Thank you for your time.

PC144

Submitted by: Dennis Martishev

F/V unknown

Community of Residence: Wasilla

Please do not shut down Nushagak district till the 28. That's going to be to big of a financial loss for my family. There's other ways of King management.

PC145

Submitted by: Andrey Martushev

Community of Residence: Homer, AK

My name is Andrey Martushev on the F/V Tremor. I've been a Bristol Bay permit holder almost 20 years.

I strongly oppose Proposals 44, 61-68,

For example proposal 61; opening the season on June 28 which is about 10-12 days later than the regular season. This would significantly impact the fishery, not just on loss of harvest of over 7 million sockeye but over escapement of the rivers impacting the return on the salmon to the area. Also starting at a later date the financial loss of many fisherman relying on this fishery as their lively hood, would be devastating. The Bristol Bay run is very quick and short to begin with which would definitely cause over escapement. And you need to seriously look into the trawlers that scoop up and ruin the sea floor and catch more salmon than we drift netters can ever harvest. Please take this into consideration. Thank you!

PC146

Submitted by: David Martushev

Community of Residence: Homer Alaska

My name is David Martushev. I am a boat owner and Bristol Bay drift gillnet permit holder from Homer, Alaska, with 15 years of experience fishing in Bristol Bay.

I strongly oppose Proposals 44 and 61-68.

These proposals would hurt commercial fishing in the Nushagak District by delaying openings, closing the sockeye fishery longer (like until June 28 in Proposal 61), and changing the management plan. This could cost the fleet over 7 million sockeye in good years and devastate fishermen, crews, processors, and communities that rely on this short season.

The Nushagak King Salmon Stock of Concern Management Plan was adopted in 2023 after years of input from stakeholders. We haven't seen it through a full cycle yet—changing it now reduces flexibility and puts the full burden of conservation on the in-river commercial fleet.

While we all want strong king returns, real solutions need to address major sources of mortality outside Bristol Bay. For decades, Bering Sea pollock trawlers have taken tens of thousands of Chinook salmon as bycatch every year—often 20,000-50,000+ in the pollock fishery alone (per NOAA/NMFS data). Genetic studies show some of these are Western Alaska stocks, including fish that could return to Bristol Bay systems. Recent examples include over 35,000 Chinook bycaught in 2023 across Bering Sea/Gulf trawlers, and incidents shutting down fisheries after hitting caps. Trawlers operate under federal

management with bycatch caps, but those caps are still high enough to remove thousands of kings that never reach Alaska rivers.

Bristol Bay directed fishermen already follow strict escapement goals and conservation measures. It's not fair to restrict our harvest further without stronger action on offshore trawl bycatch—a problem we've highlighted for years.

Please reject Proposals 44 and 61–68 and keep the current plan in place.

Thank you.

PC147

Submitted by: Kiril Martushev

Community of Residence: Homer

Hi, my name is Kiril Martushev on F/V Billet. I've been a bristol bay permit holder since 2017. I rely on bristol bay to get me through the winter so I strongly oppose proposals 44, 61-68.

PC148

Submitted by: Mihael Martushev

Community of Residence: Homer, AK

I'm a 30 year Bristol bay fisherman and I oppose proposals 44 and 61-68.

PC149

Submitted by: Sergei Martushev

Community of Residence: Homer

Leave proposals unchanged! As a BB permit holder we already keep getting early season fishery pushed to later dates than we have in previous years. Each season they are trying to take more and more fishing time from the fleet. Detrimental to a fisherman/small buisness.!!

PC150

Submitted by: Stifan Martushev

Community of Residence: Salem Oregon

We need a proper management plan for bristol bay, so far the current proposals are not that.

Submitted by: Eric Marxmiller

Community of Residence: Out of State

Subject: Written Testimony – Board of Fisheries Proposals

Dear Members of the Alaska Board of Fisheries,

My name is Eric Marxmiller. I am a Bristol Bay set net fisherman and permit holder submitting written testimony on the referenced proposals.

I oppose Proposals 44 and 61–68 to the extent that they would modify the Nushagak District King Salmon Stock of Concern (SOC) Management Plan.

The SOC plan was developed through a multi-year, stakeholder-driven process involving commercial, subsistence, and sport users, Advisory Committees, and the Alaska Department of Fish and Game. It has been in place for only three seasons and was not expected to produce immediate biological recovery given the 4–7 year Chinook life cycle.

Available analyses indicate the plan is functioning as intended by delaying openings, reducing fishing time during peak Chinook vulnerability, lowering commercial exploitation, and increasing escapement.

I respectfully request the Board allow the plan to remain unchanged and be evaluated over a full Chinook generation.

Sincerely,

Eric Marxmiller

Submitted by: Gregory Marxmiller

Community of Residence: Dillingham

I think proposal 44 is not very well thought out and should be rejected out of hand. Priority should be subsistence, commercial, sport in that order. At least in the Nushagak as that is considerate to local needs. To think that people should have to sacrifice being able to eat so someone can make a dollar is shortsighted at best.

I am in favor of proposal 57 as this is a huge issue for Ekuk and the Combine. I have had to replace gear because of drift entanglement in my setnet gear. I did not propose a seaward boundary for the combine as I am hoping that this proposal is sufficient to add some respect for other gear types.

Proposal 59 seems self serving by one gear type. Setnetters didn't create the allocation or the three to one rule. We have made the best of it. Drift has had the WRSMA to itself a couple of times in the last seven years. Fair is fair.

I oppose lengthening nets for setnets on the Wood River special Harvest area in proposal 60. Because of the unique riverbank in the area the first four sites on either side exponentially catch more fish than anyone else. There have been many enforcement issues and proposals written because of the conflict for those sites. This would exacerbate an already contentious area. It would also allocate more fish to the first few sites and spread even less fish to other fishers in the harvest area. If anything the extra net should be given to fishers from the fifth site on up the river or from 500 feet from the south line.

I oppose proposal 61. It adds regulation and hampers the ability of the Area Biologists to make real time decisions regarding King Salmon escapement. I don't think this is in the interest of best decision making in a dynamic environment. It may not be a shared view but I think everyone is interested in King Salmon escapement. Especially the Fish and Game management team. Hampering their abilities for three years with proposals like this may have unintended consequences that are onerous to all user groups.

I oppose any additional lengthening of boats or nets for the drift fishery the 32 foot rule has worked and it keeps things fair. Allowing more nets and ownership of nets with out a similar rule for setnet seems unfair. Sure id like more than 50 fathoms if I had another permit holder but not allowing that keeps things equal. Multiple proposals

PC153

Submitted by: Joseph Masui

Bristol Bay

Community of Residence: Homer

Subject: Written Testimony – Board of Fisheries Proposals

Dear Members of the Alaska Board of Fisheries,

My name is Joseph Masui, I am a drift gill net fisherman (owner/ operator) in Bristol Bay and I am submitting written testimony regarding the following proposals.

I oppose Proposals 44 and 61–68 to the extent that they would modify the Nushagak District King Salmon Stock of Concern Management Plan.

The SOC plan was developed through a multi-year, stakeholder-driven committee process involving commercial, subsistence, and sport users, Advisory Committees, and the Alaska Department of Fish and Game.

The plan has only been in place for three fishing seasons and was not expected to produce immediate biological recovery given the 4–7 year life cycle of Chinook salmon.

Available analyses indicate the plan is functioning as intended by delaying commercial openings, reducing fishing time during peak Chinook vulnerability, reducing exploitation of king salmon in the commercial fishery, and increasing escapement prior to harvest exposure.

I respectfully request the Board allow the plan to remain unchanged and be evaluated over a full Chinook generation.

Sincerely,

Joseph Masui

F/V Tonsina Bay

Mikal Mathisen

Bristol Bay drift permitholder/boat owner/operator 1996-present

Proposals 44, 61-69 – Nushagak King Salmon Stock of Concern Management Plan

I oppose any and all proposals making changes to the Nushagak King Salmon Stock of Concern Management plan. The plan was developed over a five year period and has only been in place for three years. The King Salmon life cycle is 4-7 years so we haven't even made it through to the low end of one life cycle. The available analyses say the plan is working as intended. During the 2023-25 seasons the commercial fleet started 2 to 5 days later than previous seasons and allowed an additional 7,982 to 11,190 king salmon past the sonar counter. Commercial fishing time has been reduced by an average of 240 hours per year prior to July 5. That is a 42% decrease in time from the previous management plan. All of this adds up to a commercial fishing king salmon exploitation rate of 10%. Prior to 2023 the commercial exploitation rate was 23%. If the June 28 start date were in effect for 2025 the commercial fleet would have missed out on 7 million sockeye. At 5.1 pounds/fish and \$1.70/pound that is over \$60 million dollars in lost revenue to the fleet. The district managers must be allowed to manage without date constraints over their heads.

Proposals 45-47 – Registration dates

I oppose changes in the Naknek emergency order dates. The area manager already has the ability to keep the 48 hour transfer period in affect during years of low escapement.

Proposals 48-51 - Kvichak Special Harvest Area

I oppose these proposals. We haven't had any Kvichak special harvest area openings yet and have no idea what if anything needs to be changed.

Proposal 52 – Upper Egegik Section

Neutral

Proposal 53 – Egegik Special Harvest Area

I oppose the idea of a late season smaller district.

Proposals 54-55 – Silver Management

Support

Proposal 56 – Nushagak set net seaward boundary

Neutral

Proposal 57 – Nushagak set net fishery boundary preventing drift boats from entering

Oppose. Distance between gear type regulations already exist. There is no reason to shut drift boats entirely out of an area.

Proposals 58–60 - Wood River Special Harvest area

Neutral

Proposal 70 – Ugashik North Line

Neutral. I'm all in favor of more area to fish, but this extended boundary line throughout the season would likely effect escapement patterns in the Egegik and Naknek/Kvichak districts.

Proposals 71-74 – Late season general district

I support any or all of these proposals. It would be a much better fishing style conducive to late season scratch fishing. With the fleet spread out the opportunity for late July Kings and Silvers to get by would be increased. It would also allow the fleet to move away from the seals that harass the participants on the east side. I would suggest coming up with a boundary line between Naknek and Egegik and a boundary line between Egegik and Ugashik to give all three areas a similar sized district and make sure the fish taxes go to the proper boroughs.

Escapement is no longer being counted at this point so a general district should not biologically affect the fishery. We are also likely to see more resident effort in the late season with a general district fishery.

Proposals 75-78 – Dual permit for one operator

Support. Every boat operating as a dual permit improves the fishery for the rest of the fleet. We are heading into smaller forecasts and need to continue to make changes to increase the fishery value to the participants. Since the 2022 season our forecast has cut in half. Less boats and less gear in the water mean more fish for everyone else. It also leaves more room in the water for Kings to get past the fleet. We have developed a lease fishery and people are making money by not fishing. Between 2020 and 2024 an average of 257 medical transfers took place. I don't think that was ever the intention of limited entry. The current rule is costing fishermen tens of thousands of dollars annually. As it stands now a single operator must lease a second permit in a crewmember's name if he wants to fish a 200 fathom net. At the end of 10 years he will have nothing to show for all that money going to non-participants in the fishery. If instead of leasing for 10 years that same person obtained a bank loan and made payments for 10 years he would now own his own second permit. One of the arguments against permit stacking has always been that it will make it harder for new entrants in the fishery. I disagree as it is the value of the fishery that determines permit pricing. Also it should be noted that Bristol Bay Economic Development Corporation (BBEDC) has a loan program in place for watershed residents.

Proposal 79 – Ugashik set net offshore distance

Neutral

Proposal 80 – Set net joint venture

Neutral

Proposal 81 – Non entanglement nets

I oppose the idea of different gear for harvesting in Bristol Bay

Proposals 82-91 – Vessel length

I support with amendments cleaning up the vessel length issue. Unfortunately, most of these proposals just go down the road of redefining existing definitions of trim tabs, gillnet rollers, anchor fairleads and anything else sticking off a boat beyond 32 feet and adding miscellaneous length limits to these extremities. I see two possible ways to clean this up. My first recommendation is to come up with an overall length that the vessel in its entirety fits within. I

believe this idea is what the troopers prefer. Most of the current jet boats have as much as 3 or 4 feet of a guard off the back of the boat plus a foot or more of anchor roller/fairlead off the front. If we went to an overall length of 37 feet I think 99% of the existing fleet would fit within. This would also allow smaller boats in the fleet to add length to their boats increasing buoyancy and stability. Many boats have added RSW systems and travel around with slack tanks of water. Increasing stability and buoyancy by lengthening these boats would make them much safer and could be done for considerably cheaper than a new build. A second option to clean up the length limit is to keep the boats at 32' and allow any and all non flotation items beyond that. Anchor rollers, jet guards, outdrives, keel coolers, etc could all go beyond the 32' buoyant hull. It should be noted that when measuring purse seine vessels in Alaska the anchor roller/fairlead does not count as part of the measurement. If nothing is clarified we probably end up with no length limit in the near future and let the logistics of Bristol Bay determine what size boats people end up with.

Proposal 92 – NK closure July 25

Oppose.

Proposals 93-94 – Togiak Fishing Periods

Neutral

Proposal 95 – District registration/reregistration

Support with amendments. I agree with this proposal but would move the unregister date up to 900 am June 17. This would line up with the start of the Egegik emergency order period and still allow the fleet time to get out and test their equipment and crew in early June.

Proposals 96-104 – Sport fishing

Neutral

Proposal 105 – King Management

Oppose

Submitted by: Erik Maudslien

Community of Residence: Seattle

Dear Members of the Alaska Board of Fisheries,

My name is Erik Maudslien, I am a drift gill net fisherman in Bristol Bay and I am submitting written testimony regarding the following proposals.

I oppose Proposals 44 and 61–68 to the extent that they would modify the Nushagak District King Salmon Stock of Concern Management Plan.

The SOC plan was developed through a multi-year, stakeholder-driven committee process involving commercial, subsistence, and sport users, Advisory Committees, and the Alaska Department of Fish and Game.

The plan has only been in place for three fishing seasons and was not expected to produce immediate biological recovery given the 4–7 year life cycle of Chinook salmon.

Available analyses indicate the plan is functioning as intended by delaying commercial openings, reducing fishing time during peak Chinook vulnerability, reducing exploitation of king salmon in the commercial fishery, and increasing escapement prior to harvest exposure.

I respectfully request the Board allow the plan to remain unchanged and be evaluated over a full Chinook generation.

Sincerely,

Erik Maudslien

F/V Pinnacle

[Learn More](#)

Disclaimer: The information provided by BBRSDA is intended to support member awareness and engagement in the Board of Fisheries public process, including consideration of Proposal 41 and Proposals 61–68. BBRSDA does not speak on behalf of individual fishermen or permit holders, and any positions expressed in written testimony are those of the individual submitting the comments. Members are encouraged to review all proposals in full and submit testimony that reflects their own perspectives and experiences.

Frances Bursch/

Updates

BBRSDA Mission Statement

Maximizing the value of the Bristol Bay fishery for the benefit of our members.

Featured Publications + Presentations

ADFG 2026 BB Sockeye Salmon Forecast

UW-FRI 2026 Bristol Bay Sockeye Salmon Forecast

ADFG 2025 Preliminary Run Summary

Upcoming BBRSDA Meetings & Events

BBRSDA Board Meeting

December 17, 2025 at 10 am AK

Teleconference - AGENDA

Sign up for Bristol Bay Waypoints, eNewsletter, which will keep you informed on matters that directly affect our fishery.

Sign Up

Untitled.jpg

Check out our consumer facing website

bristolbaysockeye.org

Bristol Bay Regional Seafood Development Association | (907) 677-2371 | info@bbrsda.com

PC156

Submitted by: Seth McCallum

Community of Residence: Petersburg Alaska

I oppose proposals 61, 62, 68, 69 that address the king salmon management plan in the Nushagak river.

I think these would negatively affect the commercial fishery in a way that would effectively destroy the current fishery in the whole Bristol Bay area. More restrictions to protect the king salmon without giving proper time for the current management plan seems misjudged. I think the most important thing the department needs to do is figure out how to accurately count the kings coming into the river already. As a commercial drifter in Bristol Bay I can confidently say that closing down the season more than we already are will not improve escapement to the levels needed. Interception of kings seems few and far between. Net size restrictions, closing certain areas of high king abundance, better counting techniques, closing home pack for drifter and setnet operations from non locals, and better counts of king salmon from lodges and guides might be better places to start. Restricting commercial set and drift fisherman would be detrimental to the fishery, as we have already lost so much time to the existing restrictions for king salmon. If the fishing time for commercial fishermen is further restricted, then fisherman will have to move to other rivers. I'm hoping the board will see that these proposals will harm commercial fisherman in a way that will destroy the fishery.

I support proposals 70, 71, 72, 73, 74 addressing an open district at the end of the season.

I believe this will allow for more late season opportunity and allow a more fair playing field for the fleet. Late season fishing has gotten so out of hand with people fishing over the line in Naknek and Egegik that it makes it completely unworkable. Having more room would make it much easier to safely and legally complete the season.

I support proposals 75, 76 for D Permit stacking.

This would be a great way to improve the fishery. It would allow people to invest into the fishery and take net out of the water, allowing more opportunity for fisherman in Bristol Bay. This would also help

king salmon escapement in the Nushagak, as less net in the water would allow more kings to swim through. Without high volumes of sockeye, this fishery will not make sense unless the value of the salmon actually rises a substantial amount. There are too many boats fishing the bay as a study has shown in recent years.

Boat length restrictions.

I personally believe that the 32 feet limit is a very out dated regulation. It has made the fishery much more dangerous than needed. I think the anchor roller proposal would be an easy change. However the proposals also seem to mostly help people who have built these huge jet boats without much thought of the 32 foot length. I think most of the new boats have 6-8 feet of machinery hanging off the stern which seems bizarre that is allowed.

Proposal 95

I support this proposal and think this one of the best proposals for the fishery. This would allow fisherman to test their gear and provide green crews much needed practice early in the season. Then having the ability to "unregister" your permit would allow the fisherman to watch the escapement numbers and Port Moller numbers and be able to make an informed choice and pick any district to fish in. It would also allow the Department of Fish and Game to keep track of the fleet, as boats would not be able to buzz back and forth between districts, which was a problem in the past. I really hope the board can pass this proposal to allow the fisherman this proposal.

PC157

Submitted by: Kyler Mccarthy

Community of Residence: Bozeman MT

Proposal 62 if passed will almost ensure over escapement of sockeye every year in all 3 major nushagak river systems. By June 28th in all likelihood 5-10 million fish will be up the Nushagak, and in years past that is accurate figure for June 28th if you include harvest. In terms of dollars, assuming 5 lb average, 50 million lbs of fish and at \$1.5 a lb. This will cost the Bristol Bay Commerical Fisherman \$75 million dollars a year, which in turn costs the state money via the fish tax. Fisherman in the bay have already been stretched thin with higher expenses and lower fish prices over the last 3 years. This is not what is best for the overall economic health of Bristol bay and its communities.

PC158

Submitted by: Edward McDonnell

Cozy Ray

Community of Residence: Dillingham, AK

Proposal 84

OPPOSE

COMMENT:

I strongly oppose Proposal 84 and any efforts to increase the 32-foot vessel length limit. Raising this limit will only further the wealth gap in the fishery, creating a competitive disadvantage for the majority of the fleet who operate existing 32-foot vessels. It shifts the advantage to those with significant capital

who can afford to build newer, larger boats, leaving smaller, local operations disparaged and unable to compete. The current 32-foot limit has successfully maintained a level playing field for decades, and removing it effectively forces an expensive "arms race" that many permit holders cannot afford.

Proposal 57 – OPPOSE

Topic: Gillnet specifications and operations (Establish shoreward boundary for drift gillnets/Ekuk Beach)

Comment:

I oppose Proposal 57 regarding the new boundary restrictions on Ekuk Beach. This proposal acts as a "land grab" to secure more exclusive space for set netters in a section of the Nushagak where they are already extremely successful and have access to the most profitable sites. The current regulatory system is sufficient to prevent conflict if set netters utilize well-defined buoy markers and lights to make their gear visible. The issue is often not the spacing itself, but that set netters have been enabled to use hidden anchors, rails, and other sinkable items that create underwater hazards and rip up drift nets. We do not need new exclusion boundaries; we need better visibility and marking of set net gear to ensure safe navigation for all users.

Proposal 56 – OPPOSE / COMMENT

I oppose making these boundary definitions permanent without addressing the underlying issues of gear visibility and hidden hazards. Establishing these rigid boundaries largely benefits one user group while restricting the drift fleet's traditional access. The focus should remain on proper gear marking (lights and buoys) rather than expanding or locking in exclusive zones that limit drift fishing opportunity.

PC159

Submitted by: Bryce McKinley

Community of Residence: Los Angeles, California

Written Testimony – Board of Fisheries Proposals

Dear Members of the Alaska Board of Fisheries,

My name is Bryce McKinley, I am a set net fisherman in Bristol Bay and I am submitting written testimony regarding the following proposals.

I oppose Proposals 44 and 61–68 to the extent that they would modify the Nushagak District King Salmon Stock of Concern Management Plan.

The SOC plan was developed through a multi-year, stakeholder-driven committee process involving commercial, subsistence, and sport users, Advisory Committees, and the Alaska Department of Fish and Game.

The plan has only been in place for three fishing seasons and was not expected to produce immediate biological recovery given the 4–7 year life cycle of Chinook salmon.

Available analyses indicate the plan is functioning as intended by delaying commercial openings, reducing fishing time during peak Chinook vulnerability, reducing exploitation of king salmon in the commercial fishery, and increasing escapement prior to harvest exposure.

I respectfully request the Board allow the plan to remain unchanged and be evaluated over a full Chinook generation.

Sincerely,

Bryce McKinley

F/V Baby Mary

Kvichak Setnetters Association

PC160

Submitted by: Wynn Mckinnis

Community of Residence: Palmer Alaska

Hello, my name is Wynn mckinnis and I am in opposition to proposals 44, 61-68. As a drift permit owner in the Bristol bay salmon fishery, these are very concerning to me especially that of prop 61 that the Nushagak district would be closed until June 28th at 9am with no exceptions. In the past the Department has allowed for certain triggers to prompt fishing time before the 28th of June. Getting rid of these triggers to conserve the passage of king salmon would potentially result in over escapement and loss of revenue generation for the state.

Wynn Mckinnis

PC161

Submitted by: Eric Meyer

Community of Residence: Sitka, AK

Proposals 45-47: I support these proposals. By extending the date to the 22nd from the 17th, it will allow Eastside Biologists to manage the Naknek/Kvichak district based on allocation and run size for a longer period of time, often when large volumes of fish are still returning to our district. It could also reduce the number of forced down days between the end of emergency order period and when the “free week” schedule begins on the 23rd.

Proposals 48-49: I strongly support any proposal that creates a more fair balance in the drift to set ratio in the Kvichak River Special Harvest Area. The 3:1 ratio is antiquated and does not create a fair balance in allocation. That ratio was created for the Naknek River Special Harvest Area in the 90s when the drift fleet was comprised of vessels that were less mobile and long before “D” boats were ever established. I believe the ratio in the NRSWA should be changed as well to reflect this change in the fleet, but particularly should be addressed now when establishing the KRSWA. If stocks become a concern and managers start to look towards utilizing these special harvest areas, drift participation in that district goes down due to their ability to transfer to another district. Setnetters are stuck in the mud per say, and have no option to fish elsewhere. I believe proposal 49 creates the most fair ratio based on drift participation, but due to the complexity of it, it may be impractical, and if that is the case, then a set 2:1 ratio should be adopted.

Proposals 61-62: I strongly oppose anything that prioritizes the management of king salmon over sockeye salmon. I understand the importance of protecting a stock of concern, but prioritizing a fish with small return numbers over the dominant species that brings so much economic value to the region is a

big problem for the fleet, and particularly local fishers. It can also create issues of over escapement that can create far reaching implications to the fleet, as well as future runs.

Proposals 64-65: I oppose these proposals for similar reasons as proposal 61 and 62. They prioritize sport fishing for king salmon over the commercial sockeye industry. They restrict the Westside Biologist's ability to manage sockeye abundance for harvest.

Proposal 70: I strongly oppose increasing the size of the Ugashik District. Interception of fish bound for a district is an issue for all districts. If the issue of concern is interception of stocks bound for Ugashik, particularly from the Area M district, restrict Area M rather than increase Ugashik. Increasing the Ugashik district size would increase interception of stocks bound for Egegik and the Naknek Kvichak.

Proposals 71-74: I strongly oppose creating a general district in Bristol Bay. Fish and Game Biologists have the difficult task of managing each river system for their sustainability of future seasons. Each river system is what is known as a "terminal fishery", meaning that the fish are harvested in the district in which they were bound. That is the reason that interception is a concern for all districts. Harvesting salmon in a general district eliminates the "terminal" portion of the fishery and would make it impossible for biologists to record and document run strength in each river for future stocks, as well as their ability to manage in-season allocations set for each district. That is the reason that the general district management plan was abolished before, and that should be upheld.

Proposal 92: I strongly oppose this proposal. Even though most fishers have typically gone home by this date, this eliminates even the possibility of a fisherman in Naknek/Kvichak district to continue fishing beyond the 25th. The people this would hurt the most are locals who live in the area and can continue to fish.

Proposals 105 & 185: I oppose the creation of a king salmon management plan in the Naknek/Kvichak district, as well as the other rivers that do not currently have one. King salmon numbers are down across the entire state of Alaska, and across the entire West Coast, not just the Bristol Bay watershed. They are a stock of concern everywhere, and it is unknown why these numbers are declining. Meanwhile, Bristol Bay sockeye runs are as strong as ever, and maintaining the sustainability of those runs should continue to be the priority of Fish and Game Biologists in Bristol Bay.

PC162

Submitted by: Caleb Mikkelsen

Community of Residence: Wasilla

58) No, just limits the biologist more

60) No, changes allocation in favor of a small area.

61, 62, 68) No, more restrictions and we have yet to see a full King age return from previous King Conservation change.

71, 72, 73, 74) Yes, we NEED a general district after enforcement leaves. The lawlessness is awful!

75, 76, 77, 78) No, monopolizes permits and keeps younger generations from affording permits. This will increase the price of permits.

80) No, hard to enforce, and the imitations for a set net were clear when the permit was bought.

85) Yes, clear, enforceable, and does not change the intent of the previous regulations while adding some new age technology improvements for fish quality.

86) yes, it clarifies the current intent of the regulations. It allows older smaller boats to use the full competitive extent of the regulations.

87)Yes, transom coolers allow fish to be continuously chilled under all circumstances, this new technology helps quality be easier without changing original intent of the regulations.

90) yes, it gives a very clear, enforceable, measurable limit that does not change the original intent of the regulations.

92)No, way too restrictive and way too early. This would drastically reduce many peoples late season fishing plans. Kvichak is known for later runs and this could allow for loss in a lot of fishing revenue.

PC163

Submitted by: Laura Mikkelsen

Community of Residence: Wasilla, AK

58. No, this just limits the biologists

75-78 Strongly oppose permit stacking in any way. Hurts the younger generation and make it harder for them to start up

80. No. Hard to enforce. Gets abused.

85. Yes. Good overall length

87. Yes. We need transom coolers. They greatly increase fish quality as they make RSW systems more fool proof and efficient

88. Yes. Simplify

90. Yes. Clear definition

92. No. Too restrictive

PC164

Submitted by: Roger Mikkelsen

F/ Abundance Owner and Bristol Bay Bristol Bay Drift Permit Holder and Fisherman
since 1987

Community of Residence: Dallas, Oregon

My comments are in relation to the massive foregone harvest and potential over escapement resulting from the policies attempting to conserve Nushagak King salmon. As a Nushagak drift fisherman, I would like to see more options to catch the early sockeye, while protecting the king salmon as much as possible. Examples would be: allowing short high water openers, restricting mesh size to 4.5", splitting the district to East and West sides and only allowing fishing on the East Side during the early season.

Alaska Board of Fisheries – Bristol Bay Finfish Meeting

Madam Chair and Members of the Board,

My name is Mary Miner, and I am a set-net permit holder fishing on Ekuk Beach in the Nushagak District. Three generations of my family have fished on Ekuk. My father first came to the beach, then his daughters, and now my children. It is a part of our family history and each one of us cherishes the opportunity to return year after year.

I submit the following comments as a member of the Ekuk Beach Fishermen's Association (EBFA) and as someone whose family depends on a safe, fair, and sustainable Bristol Bay fishery.

Allow the Nushagak Chinook Management Plan to Complete a Full Life Cycle

I support allowing the Nushagak Chinook Management Plan to work without preemptive alterations. Chinook are long-lived fish with a life cycle of seven years, and meaningful evaluation of conservation outcomes requires time and consistency. This plan was developed through a multi-year, Board-convened stakeholder process and adopted unanimously in 2023. Re-setting management in the middle of the Chinook life cycle creates instability for fishing families and undermines the ability to evaluate whether the plan is working.

Support for Proposal 56: Predictable Spatial Boundaries

I support Proposal 56, which would make Ekuk's coordinate-based offshore set-net boundary permanent. Adopted by the Board in 2022, this boundary has been working successfully as a clear, predictable, and enforceable seaward limit. Making it permanent provides certainty for set-net placement, drift operations, and enforcement in a high-density fishing area.

Support for Proposal 57: Orderly and Safe Fishing

I support Proposal 57, which establishes the same boundary as a shoreward limit for drift gear and prohibits contact with set-net gear. This proposal reduces entanglement risk, gear loss, and unsafe nearshore interactions by clearly defining spatial limits and updating set-net gear definitions. As the drift fleet has grown significantly in size and horsepower, these clear, enforceable rules are essential to maintaining an orderly and safe fishery.

Support for Proposal 80: Joint-Venture Set-Net Operations

I support Proposal 80, which allows limited joint-venture set-net operations under defined conditions. Joint ventures help small, family-based sites adapt to short openings, rising costs, and safety challenges without increasing fishing footprint or promoting consolidation. This approach has worked successfully in Kodiak set-net fisheries for over four decades.

Economic and Community Impacts of Missed Allocation

In recent years, set-net fishermen in the Nushagak District have consistently fallen far short of the Board-adopted 26% set-net allocation. These shortfalls, in harvest share and time, have real consequences for fishing families, local processing, and watershed communities like Ekuk. When allocation exists on paper but is not achieved in practice year after year, the economic and social fabric of Bristol Bay communities is weakened.

Together, these requests are important steps toward equitable harvest share in practice, not just on paper. Allowing the Chinook Management Plan to complete at least a full life cycle before considering alterations to the plan encourages participation and trust in conservation management; Proposals 56 and 57 reduce conflict and safety risks that disproportionately impact onshore set-net fishermen; and Proposal 80 provides limited flexibility for small operations to adapt to shortened and more complex fishing opportunities. These measures help ensure that set-net fishermen in the Nushagak District have a fairer opportunity to sustain our fishing families and watershed communities over the long term.

Thank you for your consideration and for your service to Alaska's fisheries and fishing communities.

Respectfully submitted,

Mary Miner

Ekuk Beach, Nushagak District

Submitted by: Tom Montecucco

Community of Residence: Naknek

Late season fishing has always been a bandits paradise. Legal fishermen are not allowed to harvest. Please do the right thing and take their power away.

Submitted by: Brendan Mulholland

FV Katana (Bristol Bay Drift)

Community of Residence: Blaine, WA

Written Testimony – Board of Fisheries Proposals

Dear Members of the Alaska Board of Fisheries,

My name is Brendan Mulholland, I am a drift gill net captain and owner in Bristol Bay and I am submitting written testimony regarding the following proposals.

I oppose Proposals 44 and 61–68 to the extent that they would modify the Nushagak District King Salmon Stock of Concern Management Plan.

The SOC plan was developed through a multi-year, stakeholder-driven committee process involving commercial, subsistence, and sport users, Advisory Committees, and the Alaska Department of Fish and Game.

The plan has only been in place for three fishing seasons and was not expected to produce immediate biological recovery given the 4–7 year life cycle of Chinook salmon.

Available analyses indicate the plan is functioning as intended by delaying commercial openings, reducing fishing time during peak Chinook vulnerability, reducing exploitation of king salmon in the commercial fishery, and increasing escapement prior to harvest exposure.

I respectfully request the Board allow the plan to remain unchanged and be evaluated over a full Chinook generation.

Sincerely,

Brendan Mulholland

FV Katana

Submitted by: James Nash

Community of Residence: Mount Vernon, Washington

I oppose proposals 44, 61-68.

I have fished in Bristol Bay for 56 years as crew and owner and operator of five boats. I have fished all districts but got my start in the Nushagak.

I believe that there has not been enough time given to the current plan in order to evaluate its effectiveness. One change at a time after thorough examination of the data, allows for better management.

Please allow the current plan to stay in effect until at least the 2023 run of Kings has had a chance to mature, allowing for a more complete evaluation of the plan's effectiveness.

Submitted by: Mark Niver

Community of Residence: Wasilla

I support permit stacking, general district.

Submitted by: Daniel Nolan

Community of Residence: Knik Alaska

I am an Alaska resident Bristol Bay salmon fisherman with 8 years in Bristol Bay. I believe the current management plan has the best ability to properly conserve and steward the amazing resource of Bristol bay salmon. Basing opening decisions on in season data and actual run timing has proven itself as an effective way to produce a sustainable surplus for everyone who uses Bristol bay salmon.

Placing arbitrary dates for commercial openings ties the hands of biologists who are trying to manage resources in the best way possible.

Submitted by: Patrick Nolan

Community of Residence: Knik

It is in the best interest of the resource to leave the management plan unchanged. All of the drastic measures taken in other fisheries to increase King salmon stocks have proven unsuccessful. The current plan is conservative giving biologist Leeway to respond as necessary in an emergency in season without ruining the viability of the entire resource by mandate

Submitted by: Dan Norman
Community of Residence: Kenai

PC172

I oppose Proposal 61 because critical data, mostly fish counts, remain unreliable. The range of 40%-60% of the chinook salmon are not counted by the sonar. The causes of Chinook decline are broad, locking in strict harvest restrictions via Proposal 61 will hamper adaptive, science-based management due to reliance on wildly uncertain sonar counts.

I believe the better path is to focus first on improving assessment and monitoring then work to adopt more flexible, adaptive protection measures.

And until the State can address the elephant in the room and take on the trawlers and the wanton waste of tens of thousands of chinook, we continue to fight for the scraps left to Alaskans by the trawl fleet.

PC173

Submitted by: Jessica Normandeau
Community of Residence: Victor, ID

I am commenting on proposal 44 and 61-61. I highly oppose these proposals. As a Bristol Bay commercial fisherman and permit holder I feel these proposals show a massive lack of understanding of the nuances of the Bristol Bay salmon fishery and are misguided in their resolve.

PC174

Submitted by: Erik Noste
Community of Residence: Washington State

Against Proposal #70. It appears to be an effort to increase interception of other rivers fish. According to Table 70-1 24% of the Ugashik catch in 2024 was made up of Egegik bound fish.

PC175

Submitted by: Mark Noste
Community of Residence: Carlsbad, CA

Proposal 70 This seems like a plan to intercept more fish for the Ugashik fleet.

According to table 70-1, 24% of their catch was headed for Egegik in 2025. In 2022, only 56% of their catch were Ugashik fish. Moving the outside line outward would only exacerbate the problem of catching other districts' fish. It's clearly stated in the Proposal that this would, "increase harvest in the Ugashik District... and include intercepted fish from other districts...."

By the way, I am a member of the proposing association and I disagree with their stance. They are an insurance pool. What are doing making proposals about District Boundaries?

December 29, 2025

Alaska Board of Fisheries, Bristol Bay Finfish Meeting

Madame Chair and Members of the Board,

My name is Christine O'Connor, and I have been setnetting on Ekuk Beach in the Nushagak District for more than 40 years. I am a setnet permit holder and member of Ekuk Beach Fishermen's Association. My family and I rely on the Bristol Bay fishery and are committed to being part of a sustainable and orderly fishery for generations to come.

I respectfully offer the following comments regarding several proposals the Board will be considering at the Bristol Bay Finfish Meeting.

Public Comment Supporting Proposal 56: Remove the sunset date and permanently adopt current defined offshore locations in the Nushagak District set gillnet fishery.

I strongly support Proposal 56. The outer boundary adopted in 2022 for setnets along Clark's Point and Ekuk Beach, has allowed us to have confidence that our sites are placed within the requirements of regulation. The boundaries are a big improvement from the prior language, which created a lot of uncertainty due to use of the terms mean high and mean low water, which are not easily identified or enforced. Continuing to use the boundaries going forward will support a stable, orderly fishery on Ekuk Beach.

Public Comments Supporting Proposal 57: Adopt offshore locations used in the Nushagak District set gillnet fishery for the drift gillnet fishery and prohibit drift gillnet gear from coming into contact with set gillnet gear.

Background

In recent years setnetters on Ekuk Beach and Clark's Point Beach in the Nushagak District have experienced repeated damage to their equipment and lost significant fishing time due to entanglement and physical conflict with drift boats and nets. As the fishery has evolved to include many larger boats with significantly more horsepower, these conflicts have increased.

We operate our set gillnets on Ekuk Beach using running lines, passed through steel blocks, and secured to 8-foot iron pegs driven into the beach and seabed. This is very challenging because extreme currents in this area create tremendous pressures on lines, anchoring pegs, and nets. These currents are created by extremely large tidal fluctuations in the Nushagak Bay, ranging from -4 to +24 feet. High tides can be driven even higher by wind, creating even stronger currents.

Because of the intense pressure of the currents and tides on our setnet gear, when a drift boat hits the lines or nets, they exponentially increase the pressure and often cause damage. Even minor contact can be catastrophic for a setnet operation, and results in broken lines and nets, disturbed anchors, and fouled pulleys. When this happens, we must replace very expensive equipment – a running line costs more than \$2,000 – and are not able to continue fishing our site for a minimum of one tide. Depending on where the site is located the entire season can be compromised because the outer anchors are only accessible during the lowest tides of the year. These gear-type conflicts can also endanger harvesters on the beach when lines and nets under extreme tension are cut and

recoil. These conflicts are entirely avoidable, and can be prevented by separating the gear types as Proposal 57 describes.

Gear-type Conflict

Gear-type conflict incidents are not isolated, they occur regularly and have caused both safety hazards and significant economic loss. Below are some examples of the problems Ekuk and Clark's Point setnetters are experiencing:

1. In 2024 Taryn O'Connor and her crew were pulling their setnet onto the beach near the Ekuk Cannery, using a truck to clamp onto the line and tow the net onto the beach. While the truck was attached to the upper end line and pulling the net, a drift boat drove across that line, between the net and the beach, cutting it and causing a dangerous recoil on the line. The net then swung out into the current where it could not be reached from the shore. This incident damaged the line, compromised the operation of the setnet site, and endangered crew on the beach. It was completely unnecessary and avoidable. The boat did not need to drive between the net and the beach, and over the line. Unfortunately, as the regulations are currently written, there is very little enforcement can do in these situations. Only drift web contacting setnet web is prohibited. Proposition 57 would prohibit this kind of activity by fully prohibiting drift boats and equipment from contacting setnets and equipment.
2. In 2024 Serena McArthur was nearly hit by a drift boat while operating her setnet skiff along the Clark's Point beach. Ms. McArthur and her crew were working with their skiff on the inside 10 fathoms of her setnet (very near shore) when a drift boat ran between the skiff and the beach, narrowly missing her and her crew. Skiff-based operations work by positioning their boat under their net and running line. Therefore, the drift boat adding downward tension to the system is extremely reckless in addition to the near collision with Ms. McArthur's skiff and family. Clark's Point setnets cannot be more than 600 feet from the beach, yet a drift boat endangered the setnet crew, skiff, and gear by driving through the gap between the shore and the setnet, and over the setnet lines. Again, this was a completely avoidable and unnecessary action by the drift boat, which endangered a setnet crew and interfered with the setnet operation.
3. The Sanborn family, who setnet at Etolin Point near the southern line of the Nushagak District, had their running line cut during the most productive tides of the 2025 season. During an active setnet and drift opening, a jet-driven boat, apparently chasing shallow fish, became stranded on the Sanborn's site as the tide went out. In an apparent effort to quickly avoid detection while entangled in the Sanborn's gear, and under the cover of darkness, the jet-boat captain wallowed out a hole in the mud on top of the Sanborn's outer anchors, cutting the setnet running line. Repairing the damage to the setnet site took multiple days. Given the relatively limited fishing time on this section of beach, this extremely labor-intensive repair prevented the Sanborns from fishing three consecutive high-water tides. Those high-water tides are the only fishing opportunities available on this section of beach. This scenario happens in some form or fashion routinely, but would be prevented by separating the gear-types.
4. In 2024 my running line was cut soon after the beginning of the first opener when significant fish were in the district. We had to pull our net immediately and were unable to reset it because the tide was incoming rapidly, and the running line was loose in the current and could not be recovered to tie to the net again. Normally our site catches a

comparable amount of fish to our neighbors', During that tide our neighbor's site caught over 11,000 pounds. We only caught 3,389 pounds from the initial minutes of the period before our line was cut. The damage done to our site during this one tide cost us approximately 8,000 pounds of catch, which would have been worth \$8,800.

5. Despite the known strong currents and winds along Ekuk Beach, drift boats routinely attempt to tow their nets in a zigzag pattern along Ekuk Beach to weave between the setnet sites and closer to the beach. These boats begin their drift outside the outer setnet marker and drag the net closer to the beach in between setnet sites, and then tow it back outside the next outer marker, and make their way down the beach weaving between setnet sites. However, due to the strong currents along the beach, the drift nets and even the boats themselves often run over the setnet's outer anchors, pulley, buoys, and lines entangling and routinely damaging them.

There is not physically enough room to tow a 1,000' driftnet between setnet sites and still maintain the minimum 300' of separation between gear required by 5 AAC 06.335. Setnet sites are required to have a minimum 450' separation along Ekuk, so it is very likely that when these drift nets are towed in between two setnet sites, they are not maintaining 300' distance from the setnets on either side.

6. Drift nets entangling with setnet outer equipment routinely cut net lights and marker buoys from outer anchor pegs. Once these markers are torn away, and until they can be replaced, it is very hard to tell where the outer anchors of the setnet site are. This exacerbates the problem of conflict between gear types because when drift boats cannot see the outside end of a setnet site, they are more likely to drive or drift over anchors and running lines, increasing likelihood of additional damage. Outer marker buoys can only be replaced during some low tides, or not at all during the season depending on the topography of the site. And while the outer buoy is missing, the setnet permit holder has been placed in violation of regulation through no fault of his or her own.

Common-Sense Solution

Proposal 57 is a common-sense solution which would eliminate conflicts between drift and setnet gear in two ways. First, it uses boundaries already in regulation to separate gear types. 5 AAC 06.331(n) already defines outer boundaries for setnet sites from Clark's Point to Etolin Point, setnet equipment may not be placed or operated outside these limits. Under this proposal drift operations would use the same boundaries to stay outside setnet operations. These boundaries are easily determined so compliance is simple and enforceable for all harvesters. Second, the proposal adds new language explicitly prohibiting drift equipment from contacting setnet equipment, further eliminating gear damage and hazards to harvesters.

Using the existing boundary to separate drift operations from setnet operations will allow all harvesters to fish without conflict. Setnets, by their very definition, are anchored in place and do not move beyond the outer boundaries already defined in 5 AAC 06.331(n). If this proposal is adopted, drift nets would remain outside the same boundary, eliminating gear entanglement. Setnetters would fish as they always have, and drifters would continue to fish along Ekuk, but without causing damage to setnet equipment or impeding setnetters' harvest opportunities.

Drift gear conflict with setnet sites along Ekuk Beach has required significant enforcement effort. In 2024 there were so many incidents of damage to setnet operations that the Alaska Wildlife Troopers had to increase their patrol of the waters along Ekuk to try and discourage drift

encroachment on setnet sites and equipment. Resolving this issue would allow scarce enforcement resources to be dedicated appropriately throughout the region. The existing coordinates and boundaries are already familiar to harvesters and enforcement officers. Adopting this boundary between gear types would simplify enforcement, reduce user conflict, and allow both gear types to fish productively.

There is broad support for this proposal from the harvesters most harmed. Twenty-seven Ekuk setnetters co-signed this proposal and the Ekuk Beach Fishermen's Association supports it. ADF&G staff comments regarding Proposal 57 state, "The department SUPPORTS regulations that decrease conflicts between user groups and promote an orderly fishery."

Proposal 57 is a common-sense solution to a long-running problem and would help restore an orderly fishery in the Ekuk and Clark's Point area. It will reduce equipment damage, improve safety for crews on both drift and setnet operations, and allow enforcement resources to be used more efficiently. If this proposal is adopted, all harvesters will be able to operate their gear safely and without conflict along Ekuk Beach and Clark's Point. We thank the Board for considering this practical solution to a long-standing problem and respectfully request that you adopt Proposal 57.

Public Comment Supporting Proposal 80: Allow joint venture set gillnet fishing operations in Bristol Bay.

I support Proposal 80, which would allow us to be more efficient on Ekuk Beach. We have a small operation, with one site and two limited entry permits. Under current regulations we must pull both permit holders away from the site to deliver our fish via pickup truck to the Ekuk Cannery, about 3 miles away over a very rough gravel beach. This is not an efficient use of our crew and vehicles. Proposal 80 would allow us to be more strategic and assign one permit holder to deliver while the other remains on the site to oversee the net and crew. This is a simple change that does not affect other harvesters, and allows us to use our best judgement to manage our labor and equipment. I respectfully request the Board adopt Proposal 80.

Public Comment Opposing Modifications to the Nushagak River King Salmon Stock of Concern Plan.

I oppose Proposals which attempt to tinker with the Nushagak River King Salmon Stock of Concern Plan. It is very important to allow the Nushagak Chinook Management Plan to complete a full life cycle. Chinook are long-lived fish with a life cycle of seven years, and meaningful evaluation of conservation outcomes requires time and consistency. This plan was developed through a multi-year, Board-convened stakeholder process and adopted unanimously in 2023. Re-setting management in the middle of the Chinook life cycle would be premature, and undermines the ability to evaluate whether the plan is working and creates instability for fishing families like mine. I support allowing the Nushagak Chinook Management Plan to work without alterations.

Respectfully submitted,



Christine O'Connor,
Ekuk Setnetter
Member of Ekuk Beach Fishermen's Association

Public Comment to the Alaska Board of Fisheries Bristol Bay Finfish Meeting

Madam Chair and Members of the Board,

My name is Jamie O'Connor, and I write today as a lifelong participant in Alaska's salmon fisheries, a fifth-generation Bristol Bay set-net captain, and someone who has worked across policy, research, and community organizing to support the fisheries and coastal communities that sustain us.

First, I want to acknowledge the Board's work on the Nushagak Chinook Management Plan. Chinook conservation is deeply personal to many families in Alaska. I support allowing the current framework to operate over a biologically meaningful timeline, long enough to evaluate outcomes across Chinook life cycles. Stability, clear expectations, and respect for the extensive stakeholder process that created the plan that the Board unanimously adopted in 2023 are important not only for conservation but also for credibility and public trust in management.

I also support Proposal 56, reaffirming the predictable, seaward boundary between Clark's and Etolin Points. It improves clarity and enforceability in an increasingly crowded and dynamic onshore fishery. To further this goal, I support Proposal 57, which applies that same boundary to drift operations, keeping drift gear outside the areas where set-net gear is deployed. These boundaries are clear, easy to determine, and straightforward to enforce. The proposal also adds explicit language prohibiting drift gear from contacting set-net gear, reducing gear damage and improving safety for everyone operating on or near the beach.

In recent years, set-net fishermen along Ekuk and Clark's Point have faced increasingly frequent and costly conflicts with drift vessels operating close to shore. As the drift fleet has grown in size and horsepower, boats and nets are routinely passing through set-net lines, anchors, and pulleys. Even minor contact can break running lines, tear web, displace anchors, and create serious safety risks for crews working on the beach and in skiffs. These incidents often occur during short, high-value openings, meaning repairs can cost entire tides, and sometimes the rest of a season if outer anchors cannot be reached. Proposal 57 is needed because these conflicts are no longer isolated events; they reflect structural crowding and unclear expectations in the near-shore zone that can only be addressed by clearly separating gear types and preventing contact.

I authored and support Proposal 80 which would allow limited joint-venture set-net operations. For small, family-based sites, compressed openings and escalating operating costs are real challenges. Proposal 80 offers a carefully constrained way to share labor and logistics without expanding effort, increasing footprint, or opening the door to consolidation. It is a practical resilience tool, grounded in over four decades of experience from Kodiak set-net fisheries.

Finally, I ask the Board to consider the lived experience of Nushagak District set-netters who have consistently fallen short of allocation targets in recent years. Policy language that appears balanced on paper has real, compounding consequences when it is not realized in practice. The financial stress, attrition of local permit ownership, and pressure on small

processors and communities are not abstract trends, they show up as lost opportunity, family economic instability, and declining participation in the fisheries that define Bristol Bay's coastal communities.

I believe strongly that Alaska can protect our stocks, support orderly fisheries, and maintain fair opportunity for the families and communities who rely on them. The proposals discussed here are incremental steps toward that balance.

Thank you for your time, your service, and your ongoing commitment to the fisheries that feed Alaska's economy, culture, and identity. I appreciate your consideration.

Respectfully,

Jamie O'Connor

Bristol Bay Set-Net Fisherman

Homer & Ekwok, Alaska

Alaska Board of Fisheries – Bristol Bay Finfish

Madame Chair and Board Members,

My name is John O'Connor and I have been a setnetter on Ekuk Beach for more than 50 years. I'm a founding member of the Ekuk Beach Fishermen's Association. I respectfully submit these comments regarding proposal under consideration during the Bristol Bay Finfish Meeting.

Opposing Comment – Proposal 44: Limit the number of king salmon retained as homepack in the commercial fishery and in the subsistence fishery and report all king salmon harvested.

I oppose Proposal 44 because it conflicts with Alaska's constitutional and statutory priority for subsistence use. Article VIII of the Alaska Constitution, along with AS 16.05.258, requires that subsistence uses be given priority over all other consumptive uses when resources are limited. Proposal 44 imposes harvest caps and reporting requirements on subsistence users that mirror sport fishing regulations, effectively eroding this priority and treating subsistence as a privilege rather than a protected use.

Subsistence harvest of king salmon in Bristol Bay is not a discretionary activity; it is a constitutionally recognized use tied to food security, cultural continuity, and rural livelihoods. The proposal does not demonstrate that subsistence harvest is a primary conservation concern, nor does it show that less restrictive measures have been exhausted before placing new limits on subsistence users.

If conservation measures are necessary, the Board must ensure that subsistence users are the last to be restricted, not the first. Proposal 44 reverses that mandate and sets a concerning precedent that undermines the constitutional preference for subsistence.

Proposal 44 is ineffective for conservation goals. The Nushagak Advisory Committee noted that limiting the number of king salmon taken as home pack by commercial fishermen will not meaningfully reduce overall commercial king salmon harvest. If fish are not retained as home pack they will simply be sold commercially, leaving total harvest unchanged while imposing unnecessary complexity on reporting.

Proposal 44 imposes redundant reporting requirements. In the subsistence fishery, king salmon harvest is already tracked through existing permits and reporting systems. This proposal's reporting requirement may duplicate current processes without providing additional conservation benefit.

For these reasons, I encourage the Board to reject Proposal 44 and instead focus on regulatory changes that would deliver measurable conservation outcomes while respecting historical subsistence practices and data collection already in place.

Opposing Comment – Proposal 54: Repeal the Nushagak River Coho Salmon Management Plan

I oppose Proposal 54 because it would effectively close the commercial salmon fishery beginning August 1, regardless of run strength, stock composition, or in-season management information.

An automatic August 1 closure removes the Department of Fish and Game's ability to manage fisheries based on real-time data, escapement and catch performance, and mixed-stock considerations. Bristol Bay fisheries have historically been managed successfully through adaptive, in-season decision-making rather than fixed calendar closures.

Supporting Comment for Proposal 56: Remove the sunset date and permanently adopt current defined offshore locations in the Nushagak District set gillnet fishery.

I support Proposal 56, which would remove the sunset date and permanently adopt the current defined offshore boundary for set gillnet operations in the Nushagak District on Ekuk Beach. This change would retain a clear, fixed seaward boundary for set gillnets based on specific latitude and longitude markers rather than the unreliable and fluctuating high/low tide measurements that previously defined this limit. The current fixed boundary has provided greater clarity and enforceability for fishermen and enforcement personnel alike.

Making this boundary permanent will help ensure consistent operational expectations for permit holders, improve safety and legal compliance at sea, and avoid confusion caused by constantly shifting beach conditions. The removal of the sunset language gives fishermen and managers the long-term stability they need while maintaining orderly and equitable access to the fishery.

For these reasons, I respectfully urge the Board to adopt Proposal 56 and provide certainty and clarity to the Nushagak District set gillnet fishery.

Supporting Comment – Proposal 57: Adopt offshore locations used in the Nushagak District set gillnet fishery for the drift gillnet fishery and prohibit drift gillnet gear from coming into contact with set gillnet gear.

I strongly support Proposal 57 because it would codify clear offshore boundaries and gear separation between set gillnet and drift gillnet fisheries in the Nushagak District. Establishing these defined offshore locations improves safety, fairness, and operational clarity for all commercial salmon fishermen.

By adopting the set gillnet offshore markers for the drift fishery and prohibiting gear interactions:

- Safety at sea is enhanced — Clear, regulatory boundaries reduce the risk of entanglement between gear types, lowering hazards for vessels working in close proximity.
- Fishermen have greater predictability — Legally defined locations reduce uncertainty about where different gear types can operate, helping fishermen plan their fishing effort and avoid costly enforcement issues.
- Enforceability improves — Straightforward regulatory coordinates are easier for enforcement personnel to monitor and interpret, which supports compliance and equitable fishing opportunity across the fleet.

This proposal builds on existing management practices that many fishermen already follow and makes them permanent, clear, and equitable. For these reasons, I encourage the Board to adopt Proposal 57 at the January 2026 Bristol Bay Finfish meeting.

Opposing Comment – Proposal 59: Ensure drift gillnet fishing opportunity in the Wood River Special Harvest Area, regardless of allocation.

I oppose Proposal 59 because it would significantly limit the Department of Fish and Game’s ability to balance allocation between drift and set gillnet fisheries using in-season management.

Bristol Bay salmon fisheries depend on adaptive, real-time management to ensure fair and orderly allocation between drift and set gear groups while still meeting escapement goals. Proposal 59 would impose rigid regulatory constraints that prevent managers from adjusting fishing time and opportunity based on run timing, abundance, and allocation. This lack of flexibility would make it difficult—if not impossible—for ADF&G to make corrective adjustments to allocation imbalances between drift and set fisheries during the season.

By removing this management discretion, Proposal 59 risks locking in inequitable allocation outcomes, potentially favoring one gear group over another. This directly conflicts with the Board’s long-standing allocation policies and undermines the balanced management framework that has allowed both drift and set fisheries to coexist successfully in Bristol Bay.

The economic impacts of this proposal would be significant. Reduced or misallocated fishing opportunity affects permit holders, crew employment, processors, and coastal communities that rely on predictable and equitable access to the fishery. When managers cannot respond in season to address allocation disparities, the resulting economic harm is borne disproportionately by fishermen who lose access through no fault of conservation necessity.

Current regulations already provide ADF&G with the authority to restrict fisheries when conservation concerns arise. Proposal 59 does not improve conservation outcomes and instead reduces the tools needed to manage allocation fairly and maintain economic stability across the fleet.

For these reasons, I respectfully urge the Board of Fisheries to reject Proposal 59.

Opposing Comment – Proposals 61 and 62

Proposal 61-Repeal provisions allowing commercial fishing, adopt date-specific provisions for opening commercial fisheries based on king salmon in-river projected run size, and prohibit the retention of king salmon in the sport fishery.

Proposal 62: Prohibit commercial fishing in the Nushagak District with drift gillnets and in the Nushagak Section with set gillnets until June 28, unless the king salmon count at the sonar near Portage Creek has exceeded 55,000.

I respectfully oppose Proposals 61 and 62 and urge the Board to allow the existing Nushagak River King Salmon Stock of Concern Management Plan to remain in effect for a full life cycle before implementing additional regulatory changes.

King salmon have a 7-year life cycle, and meaningful evaluation of management effectiveness requires allowing current regulations to operate through at least an entire generation. Changing management direction before a full life cycle has passed prevents managers and the Board from accurately assessing whether the existing plan is meeting its conservation and escapement objectives.

Proposal 61 would replace adaptive, in-season management with rigid, date-specific provisions and does not include any allowance for early run timing for both Kings and Sockeye. In years when king salmon migrate earlier than average, fixed calendar triggers may unnecessarily restrict mixed stock fisheries after the conservation window for Kings has passed. Bristol Bay salmon runs vary significantly in timing, and effective management requires the flexibility to respond to those variations.

The proposal also removes the Department of Fish and Game's ability to respond to real-time biological data, run strength, and in-river conditions. This approach risks both missed harvest opportunity in strong early run timing years and ineffective conservation in late timing years, this may have a worse biological outcome than the existing plan.

The current King Salmon Management Plan already provides ADF&G with the authority needed to protect king salmon when conservation concerns arise while maintaining balanced allocation and orderly fisheries. Allowing the plan to remain in effect for a full life cycle would provide the Board with credible biological data and a stronger foundation for any future regulatory changes.

For these reasons, I urge the Board of Fisheries to reject Proposals 61 and 62.

Opposing Comment – Proposal 69: Adopt a recovery goal for Nushagak River king salmon.

I respectfully oppose Proposal 69 because the establishment of a recovery goal for Nushagak River king salmon should be developed through the Nushagak River King Salmon Stock of Concern Management Plan Committee, not set directly in regulation.

The management plan committee process exists to evaluate stock status using the best available science, incorporate updated data over time, and allow meaningful input from managers, biologists, and stakeholders. Setting a recovery goal through regulation removes that flexibility and risks locking in a target that may not reflect changing environmental conditions, run timing variability, or long-term productivity trends.

Additionally, the current King Salmon Management Plan has not yet been in place for a full king salmon life cycle. Allowing the plan to operate through a complete generation is necessary to accurately evaluate its effectiveness before establishing formal recovery benchmarks. Prematurely setting a recovery goal could lead to unnecessary restrictions or misdirected management actions without sufficient biological justification.

Recovery goals should be adaptive and science-driven, not fixed through regulation without the ability to adjust as new information becomes available. Retaining this responsibility within the management plan committee ensures that conservation objectives can evolve appropriately while maintaining balanced allocation and minimizing unintended economic impacts on Bristol Bay fisheries and communities.

For these reasons, I urge the Board of Fisheries to reject Proposal 69 and allow the King Salmon Management Plan Committee to develop and evaluate recovery goals through the established planning process.

Opposing Comment – Proposals 71, 72,73 and 74: Reestablish a General District Salmon Management Plan.

I respectfully oppose Proposals 71 through 74 because reestablishing a General District Salmon Management Plan for the Eastside Districts would reduce management clarity and negatively impact catch opportunities for terminal river users.

The Naknek/Kvichak, Egegik, and Ugashik systems each have distinct run timing, stock composition, and escapement needs. Managing these systems under a broad General District framework risk shifting fishing effort away from terminal areas where harvest opportunity is most appropriate and biologically efficient. This can result in reduced fishing time and lost harvest opportunity for terminal river users, even when individual river escapement goals are being met.

Terminal fisheries are designed to allow harvest closer to the river of origin, improving stock-specific management and reducing mixed-stock impacts. Proposal 71 could undermine these benefits by prioritizing broader district openings rather than maintaining focused terminal management that supports both conservation and fair access.

Without clear biological justification showing that a General District approach would improve conservation or fishery performance, this proposal risks reducing catch opportunity for terminal river users without providing measurable benefits.

For these reasons, I urge the Board of Fisheries to reject Proposals 71 through 74.

Opposing Comment – Proposals 75 through 78: Allow permit stacking in the Bristol Bay commercial salmon drift gillnet fishery

I respectfully oppose Proposals 75 through 78, which would allow permit stacking — enabling one person who owns two drift gillnet permits to operate up to 200 fathoms of gear on a single vessel — because it would reduce equitable opportunity, concentrate fishing power, and harm small-scale fishermen and coastal communities.

Allowing permit stacking effectively increases harvest capacity for individuals with greater capital and access to multiple permits. This shift would aggregate fishing effort into fewer vessels, reducing the number of active boats participating in the fishery and concentrating economic benefits among fewer operators. Over time, this could lead to reduced local economic diversity, fewer crew jobs, and diminished community participation in the Bristol Bay commercial fishery, all without a clear biological or conservation benefit.

Smaller operators, new entrants, and families that rely on a single permit for income would be disadvantaged, as they cannot achieve the same efficiency gains without purchasing or leasing additional permits at high cost. This runs counter to the Board's objectives of maintaining broad participation, fair opportunity, and economic stability in the fishery.

Furthermore, concentrating limited entry permits, gear and power into fewer hands is what the limited entry permit system was developed to keep from happening. It was developed in part to make sure the fishing effort was spread out into a diverse effort held by many stakeholders. If one stakeholder is allowed to own multiple permits it could take a disproportionate share of fishing capacity out of the small operators hands. I feel this could lead to more instability for small communities that depend on a predictable salmon harvest from their residents. With seafood job numbers and small communities already under pressure across the state, adding regulatory changes that could reduce economic resilience is unwise.

For these reasons, I urge the Board of Fisheries to reject Proposals 75 through 78 and preserve a regulatory structure that supports equitable opportunity, diversified participation, and long-term economic resilience for Bristol Bay fishermen, crews, and communities.

Supporting Comment – Proposal 80: Allow joint venture set gillnet fishing operations in Bristol Bay

I support Proposal 80 because it would allow small operators and family operations the flexibility to best utilize their resources by allowing one person and delivery vehicle to deliver more than one site's catch. Many of these small operators have to travel long distances to deliver their catch. Many times, this means one vehicle for each site must travel more than 20 miles to deliver a few fish. Allowing a joint venture would allow more of the crew to watch over the catching operation which will improve safety and fish quality. This will also reduce much wear on vehicles and allow small operations to afford reasonable upgrades to one delivery vehicle, which will also improve safety, efficiency, and product quality without increasing gear in the water.

Allowing permit holders to upgrade a single delivery vehicle recognizes the practical realities of operating a small scale set net operation in Bristol Bay. Safer, more reliable delivery vehicles help reduce mechanical failures, weather-related risk, and delays in transporting fish. This improves crew safety and supports higher-quality deliveries to processors without expanding fishing effort.

For these reasons, I encourage the Board of Fisheries to adopt Proposal 80 and allow limited delivery-vehicle upgrades that improve safety and efficiency without expanding fishing capacity.

Thank you for the opportunity to comment on these proposals.

Respectfully submitted,

John O'Connor

Submitted by: Lloyd (Tom) O'Connor

Community of Residence: Dillingham

Tom O'Connor's revised public comments

Madam Chair and Members of the Board,

My name is Tom O'Connor and I am a set-net permit holder fishing on Ekuk Beach in the Nushagak District. As a majority of my income as well as that of all of my family depends on revenue generated by set-netting in the Nushagak. I will try keep my comments to proposals I think will impact our area and gear type.

I put a high value on protecting Kingsalmon in our district. I was one of the folks that sat on the Nushagak Kingsalmon Management Plan Committee. We spent a good deal of time working on the details of the Plan. I'm opposed to make any significant changes to it at this board cycle. However if the plan does get cracked open I am one of the authors of Proposal 67 and would FULLY SUPPORT Proposal 67 being put forward AT THAT TIME..

While I understand that catch and release mortality studys in the Nushagak appear to show relatively low mortality on Kings. I'm not the first member of the Kingsalmon committee to draft a proposal to restrict fishing Kingsalmon on the spawning areas.

I seriously question whether Nushagak catch and release mortality studies accurately reflect mortality on Chinook caught as far up river as the spawning areas. At this stage of life spawners have exhausted much of their stored energy getting to the spawning grounds.

I think these studies fail to adequately measure reductions in vitality and increased levels of mortality on fish which have a high chance of being caught multiple times on there journey up river and in areas in which they congregate waiting to spawn. While fishing for kings finding a good hole in such areas can be very productive.

I would ask you as Board Members to consider these questions and coments and if you think they have merit, seek answers from ADF&G Staff as well as Other Fisheries Biologists and Scientists who work in and would have knowledge in these areas.

I Support Proposal 54,

In absence funding for basic Counts and biology, the Nushagak Coho Management plan is Unusable.

I Support Proposal 56, which seeks to make the Ekuk offshore set-net boundary permanent. Adopted by the Board in 2022, this regulation has helped as it establishes a clear, predictable, and enforceable seaward boundary. Making it permanent would benefit folks operating both set and drift nets.

I Support Proposal 57 as amended by the Nushagak Advisory Committee.

With a some additional wording which would allow a Drift boat to come to the assistance of a Set net operation there by contacting set-net equipment.

This happens quite often in the event of set net equipment damage or malfunctions.

Similar to proposals 67

I would Support Proposal 66 in the event that the Nushagak Mulchatna King Plan gets opened up but wouldn't

Support opening up the plan just to accommodate either proposal.

I Support for Proposal 80:

As I can see how it would help folks with limited resources deliver fish much more efficiently which would have many benefits including better quality.

I Support Proposals 97 and 101

I'm OPPOSED to proposals

58,59,60 and 64 all of which would make changes regarding operations in the Wood River Specail Harvest area.

I'm OPPOSED to Proposal 61

I'm OPPOSED to Proposal 62

PROPOSALS 71 through 74 I'm OPPOSED TO ANY Proposal that would create or reestablish a "GENERAL DISTRICT"

I OPPOSE Proposals 75, 76, 77 and 78,

D Permits were originally proposed to help folks stay in the fishery when fishing economics were terrible. They hung in there with the additional realization that D Permits were helping young folks and the like enter the fishery.

I'm apposed to any change to the current regulations concerning D Permits.

I've long been opposed to them being used to Consolidate Ownership of two permits by one person and if adopted would make it tougher for youg people to enter the fishery, dew to less permits being available. Also its thought to have significant potential to speed up migration of Permits out of the Bristol Bay Region.

I'm OPPOSED to 81

I'M OPPOSED TO THE NEXT TEN PROPOSALS ATTEMPTING TO CHANGE THE 32 FOOT LIMIT AND THE WAY IT IS CURRENTLY DESCRIBED IN REGULATION!!

NO CHANGE TO 32' !!

OPPOSED to 95

OPPOSED to 102

OPPOSED to 103

I have some.. Additional Coments related to the Kingsalmon Stock of Concern Management Plan.

BBSRI's Performance assessment for 2024 Nushagak Kingsalmon Stock of Concern Management Plan helps to lay out costs of implementing the plan to various user groups Vs Benefits to Kingsalmon escapement. I wanted to share my thoughts about some of the costs in productive fishing time that may not be as obvious in this report. As the report is speaking to percentages of lost fishing time by commercial fisherman in the coarse of implementing the plan. The Drift Fleet lost 37.1% and Set-net

operations lost 45.9% a difference of 8.8% more fishing time being lost by the Nushagak Set net fleet are obvious

Other Costs / Sacrifices to commercial fishing operations are less obvious. As part of the implementation of The Plan. Drift openings have been starting earlier on the incoming tide. This in part to avoid Kingsalmon as water levels drop toward low tide and Kings which are thought to be more abundant in the channels become more vulnerable. Another reason for moving the Drift openings sooner on the flood is that flood fishing tends to be more productive and the need to harvest reds quickly and efficiently while avoiding lower stages of the tide make flood fishing the fleet arguably make some sense.

Consequently though this timing has a profound effect on diminishing productivity of that fishing time set-net operations are left with. This is because we spend significantly more productive Flood Time fishing behind the drift fleet and fish are being harvested further toward the mouth of the district, dramatically reducing the number of fish in district and available to set-net operations

Another Cost to set-net quality fishing time in the last few years is. Since about 2003 up to 2023 Setnet openings started early in the season when fleet size tended to be low. This happened for a couple of reasons. The early set-net openings help assess run strength and timing as fish would be arriving in the Nushagak. Also the early catches helped to balance the gear groups allocation. As the season would be going into overdrive soon with large fleets and large runs, and a need to harvest fish very quickly would drive the fishing schedule. Lately set-net openings don't start until triggers within the Nushagak Kingsalmon Stock of Concern Plan are reached. Consequently in the past few years openings don't begin until fleet numbers are near peak. This results in a further degradation of quality fishing time for Nushagak Set-Nets.

BBSRI's Performance Assessment goes on to point out that the Cost/ Restrictions Commercial fishers have been enduring for Kingsalmon conservation put an extra 6061 Kings through the district and into escapement counts last year. This without exposing them to Commercial Fishing Pressure. It's my understanding that these numbers represent TOTAL Kingsalmon escapement enumerated during the windows of closed commercial fishing and don't take into account any sort of historical exploitation rate of the fleet on Kingsalmon. I.E. Exploitation wouldn't have been 100%. So only some percentages of the 6061 Kings counts we because of the closers to commercial fishing

For arguments sake let's say that over a 10 year span the documented number of Kings harvested by the commercial fleet averaged about 20% of the total number of kings enumerated in the escapement. Our hypothetical harvest numbers could be questioned by people in management and elsewhere so let's just double the percentages to cushion those concerns. So we arbitrarily get a 40% exploitation rate between harvest and escapement estimates. I know this is a very simple and inaccurate way to lay it out, but it's not so far from how it actually seems to work and help demonstrates some of the possible misconceptions we might have when we only take a quick look at our Plan Assessment.

So in my goofy model 60% of The Kingsalmon Not Exposed to Commercial Fishing Pressure would have made it to be enumerated anyway. Much reducing. The 2023 8304 Kings
The 2024 10,794 Kings and The 2025 6,461 Kings

That I may have perceived as saving.

I spent some years on the Nushagak AC and I come to very much appreciate the time and effort you all put in to this. Thank you for considering my Thoughts and Opinions on these matters.

Tom O'Connor

Submitted by: Lloyd Thomas (Tom) O'Connor

Community of Residence: Dillingham

Madam Chair and Members of the Board,

My name is Tom O'Connor and I am a set-net permit holder fishing on Ekuk Beach in the Nushagak District. As a majority of my income as well as my family's depends on revenue generated by set netting in the Nushagak. I will keep my comments to proposals I think will impact our area and gear type.

I Support Proposal 54

Though I find it baffling that the STATE OF ALASKA refuses to fund basic biology and enumeration of Coho in Bristol Bay.

I put a high value on protecting Kingsalmon in our district. I was one of the folks that sat on the Nushagak Chinook Management Plan Committee. We spent a good deal of time working on details of the Plan. I'm opposed to make any significant changes to it at this board cycle with exception of proposal 67 in which I am one of the authors. While I understand that catch and release mortality studies in the Nushagak appear to show relatively low mortality on Kings I'm not the first member of the committee to draft a proposal to restrict fishing Kingsalmon on the spawning areas.

I seriously question whether Nushagak catch and release mortality studies accurately reflect mortality on Chinook caught as far up river as the spawning areas. At this stage of life spawners have exhausted much of there stored energy getting to the spawning grounds.

I also think these studies fail to adequately measure reductions in vitality and increased mortality on fish which have a high chance of being caught multiple times on there journey up river and in areas in which they congregate waiting to spawn. Where finding a good hole can be very productive.

I would ask you as Board Members to consider these questions and coments and if you think they have merit seek answers from ADF&G staff aswell as other biologists who work in and have knowledge of these areas.

I support Proposal 56, which seeks make Ekuk offshore set-net boundary permanent. Adopted by the Board in 2022, this regulation has helped as it established a clear, predictable, and enforceable seaward boundary. Making it permanent would benefit folks operating both set-nets and drifting.

I Support Proposal 57 as amended by the Nushagak Advisory committee.

I Support Proposal 1

Support for Proposal 80:

As I can see how it would help folks with limited resources deliver fish much more efficiently wich would have many benefits including better quality.

I Support Proposals 97 and 101

I'm OPPOSED to proposals

58,59,60 and 64 all of which would make changes regarding operations in the Wood River Specail Harvest area.

I'm OPPOSED to Proposal 61

I'm OPPOSED to Proposal 62

I'm OPPOSED to ANY CHANGES to the 32 foot limit and the way it's defined!!

No to 71 through 74 I'm not surprisingly OPPOSED TO ANY proposal that would create or reestablish a "GENERAL DISTRICT"

OPPOSED to Proposal 75 and 76 and 77 and 78

D Permits made sence at the time

they were originally proposed to help

folk stay in the fishery when fishing economics were terrible. They hung in w there with the additional realization that they wer helping young folks entering the fishery.

They were not advertised as tool to

Consolidate ownership of two permits by one person. Doing so would make it tougher for youg people to enter the fishery dew to less permits being available. Also its though to have great potential to speed up migration of Permits our of the Bristol Bay Region.

I'm OPPOSED to 81

I'M OPPOSED TO THE NEXT TEN PROPOSALS ATTEMPTING TO CHANGE THE 32 FOOT LIMIT ANDTHE WAY IT IS CURRENTLY DESCRIBED!!

NO CHANGE !!

OPPOSED to 95

OPPOSED to 102

OPPOSED to 103

I spent many years on the Nushagak AC and I very much appreciate the time you put in. Thank you for considering my Thoughts and Opinions on these matters.

Tom O'Connor

907 843 0587

Kingfisherhouse@hotmail.com

Submitted by: Alex Oczkewicz

Community of Residence: La Conner, Washington

Dear Members of the Alaska Board of Fisheries,

My name is Alex, I am a drift gill net fisherman in Bristol Bay and I am submitting written testimony regarding the following proposals.

I oppose Proposals 44 and 61–68 to the extent that they would modify the Nushagak District King Salmon Stock of Concern Management Plan.

The SOC plan was developed through a multi-year, stakeholder-driven committee process involving commercial, subsistence, and sport users, Advisory Committees, and the Alaska Department of Fish and Game.

The plan has only been in place for three fishing seasons and was not expected to produce immediate biological recovery given the 4–7 year life cycle of Chinook salmon.

Available analyses indicate the plan is functioning as intended by delaying commercial openings, reducing fishing time during peak Chinook vulnerability, reducing exploitation of king salmon in the commercial fishery, and increasing escapement prior to harvest exposure.

I respectfully request the Board allow the plan to remain unchanged and be evaluated over a full Chinook generation.

Sincerely,

Alex oczkewicz

F/V Dan O

Submitted by: Miles Oczkewicz

Community of Residence: Bellingham, WA

Dear Members of the Alaska Board of Fisheries,

My name is Miles Oczkewicz, and I am a Bristol Bay drift gillnet fisherman. I am submitting written testimony opposing Proposals 44 and 61–68 to the extent that they would modify or further constrain the Nushagak District King Salmon Stock of Concern Management Plan.

While conservation of Nushagak king salmon is critically important, these proposals risk creating unintended and harmful consequences for the sockeye salmon stocks that are the biological and economic backbone of the Bristol Bay fishery. In particular, further delaying or restricting early-season fishing undermines the Board's ability to effectively manage sockeye escapement, increases the risk of over-escapement, and ultimately threatens long-term sockeye productivity.

Sockeye salmon in Bristol Bay are highly sensitive to escapement timing and density. Decades of data show that excessive escapement reduces sockeye productivity due to density-dependent competition for food in nursery lakes. Late harvest opportunities cannot fully correct early over-escapement, especially when large portions of the run pass upriver before fishing opportunity occurs. Once sockeye have passed the fishery, there is no management tool available to address over-escapement, even when escapement objectives are exceeded by hundreds of thousands or millions of fish.

The current SOC plan already delays fishing and significantly reduces early-season effort, allowing large volumes of sockeye to pass upriver before managers can accurately assess run strength. Proposals that further restrict fishing during this critical early window compound the risk of chronic over-escapement, particularly in strong sockeye return years.

This is not a theoretical concern. Bristol Bay has repeatedly experienced sockeye escapements well above optimal goals, and the long-term consequence of these events is reduced future run strength, not increased abundance.

Early-season fishing is not just about harvest. It is a core management tool that allows the Alaska Department of Fish and Game to shape escapement into optimal ranges, maintain age and size structure, reduce in-river crowding and disease risk, and preserve long-term yield from nursery systems.

Proposals that prioritize extended closures or additional constraints during periods of sockeye vulnerability shift risk from one species to another, trading hypothetical king salmon benefits for very real and well-documented sockeye productivity losses. Importantly, the current SOC plan already accomplishes meaningful king salmon protection by delaying openings, reducing fishing time during peak king passage, and increasing king escapement prior to harvest exposure. Weakening sockeye management beyond this point does not represent balanced conservation. It represents a failure to manage for the entire ecosystem.

The SOC plan has only been in place for three fishing seasons. Chinook salmon have a four to seven year life cycle, meaning the Board has not yet observed a single full generation under this management regime. In contrast, sockeye salmon respond immediately to escapement decisions. Damage from over-escapement occurs in real time, with measurable impacts to juvenile survival, growth, and future adult returns.

Altering the plan now, before king salmon data can be meaningfully evaluated, risks locking in sockeye management failures that will not be correctable for years, even if future boards attempt to reverse course.

The current SOC Management Plan represents a difficult but carefully balanced compromise between conservation and sustainable harvest. It already imposes significant restrictions on the commercial fleet and provides increased protection for king salmon.

Proposals 44 and 61–68 would upset that balance by further limiting fishing in ways that undermine sockeye escapement management, increase the risk of chronic over-escapement, reduce long-term sockeye productivity, and ultimately harm the sustainability of Bristol Bay's most important salmon resource.

For these reasons, I respectfully request that the Board allow the Nushagak District King Salmon Stock of Concern Management Plan to remain unchanged and be evaluated over a full Chinook generation before considering additional restrictions.

Thank you for your time and consideration.

Sincerely,

Miles Oczkewicz

F/V Daddy O



United States Department of the Interior
Office of Subsistence Management
1011 East Tudor Road MS 121
Anchorage, Alaska 99503-6199

In Reply Refer To:
OSM.C25034

December 19 2025

Ms. Märit Carlson-Van Dort, Chair
Alaska Board of Fisheries
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, Alaska 99811-5526

Dear Chair Carlson-Van Dort:

The Office of Subsistence Management (OSM), working with other Federal Subsistence Management Program agencies, has reviewed the proposals being considered at the January 2026 Bristol Bay Finfish Meeting. OSM will not provide written comments for this meeting as the proposals involve fisheries that are generally outside of Federal jurisdiction.

While there is little overlap with Federal jurisdiction, many of these proposals still have the potential to affect federally qualified subsistence users. Adopting these proposals may impact resources returning to Federal public waters that rural Alaskans rely on for the opportunity to continue subsistence activities. Furthermore, any of the ten Subsistence Regional Advisory Councils may have submitted written comments on these proposals, and we strongly encourage the Board to consider these comments during its deliberations. OSM may also wish to comment during the meeting on other items that impact federally qualified subsistence users.

We appreciate the opportunity to participate in this process and comment on these important regulatory matters. We look forward to working with the Alaska Board of Fisheries and the Alaska Department of Fish and Game on these issues. Please contact Scott Ayers, Deputy Director - Sciences, 907-744-3824 or scott_ayers@ios.doi.gov, with any questions you may have.

Sincerely,

Crystal (Ciisquq) Leonetti
Director,
Office of Subsistence Management

Chair Carlson-Van Dort

2

Cc: Federal Subsistence Board
Interagency Staff Committee
Office of Subsistence Management
Ben Mulligan, Deputy Commissioner, Alaska Department of Fish and Game
Aaron Poetter, Federal Subsistence Liaison, Alaska Department of Fish and Game
Administrative Record

Submitted by: David Owens

Community of Residence: Peterson

I am opposed to proposition 61 and 62. These will negatively affect my small business and many other small businesses as well. Any effect on my business has an effect on my family. We rely on the income from our commercial fishing business, and this would further restrict our commercial fishing opportunities. Please consider the small businesses and families of Alaska who rely on this early fishing in the Nushagak District to help stay afloat financially as our costs continually go up. Thank you, Dave Owens.



December 29, 2025

To: Alaska Board of Fisheries

RE: Opposition to Proposals 61 and 62

Dear Chair Carlson-Van Dort and Board Members,

The Pacific Seafood Processors Association (PSPA) **opposes Proposals 61 and 62** to set a fixed date and king salmon abundance trigger by which to manage commercial fishing in the Nushagak District and in the case of Proposal 61, also limit the number of hours for the commercial fishery to no more than 12 hours per day from June 28 - July 4. We strongly support retaining the current Nushagak District King Salmon Stock of Concern Management Plan and continually evaluating its effectiveness, given its success so far in both reducing commercial exploitation of king salmon and achieving additional king salmon passage. Please oppose Proposals 61 and 62 and any other proposals to the extent they modify the current plan.

PSPA is a seafood trade association comprised of Alaska seafood processing companies that operate 47 facilities in 22 coastal communities across Alaska, including salmon processing plants in Egegik, North and South Naknek, Dillingham, Togiak, and Wood River. These processors purchase millions of salmon each year in Bristol Bay and support thousands of independent fishermen and many communities dependent on fish taxes and support services. PSPA supports management systems based on sound science and sustainability principles and its members have invested heavily in infrastructure and operations in Alaska's remote communities.

Opposition to proposals 61 and 62 is based on the evidence that the current Nushagak District King Salmon Stock of Concern Management Plan is working as intended and is a more adaptable and responsive plan to managing sockeye and king salmon by using what managers are seeing in-season.

Proposals 61 and 62 would remove the key constructs of the current plan, which is tailored toward conserving king salmon even in the midst of very significant sockeye runs on which fishermen and processors heavily depend. The key changes made in the 2023 plan included:

- *Commercial Fishery Start Triggers:* New triggers for both the Wood and Nushagak Rivers, delay the start of the commercial salmon fishery and thereby afford king salmon additional protection while the ratio of king salmon to sockeye salmon remains relatively high in the district.
- *Sockeye Salmon Optimal Escapement Goals (OEGs):* Larger escapement targets, scaled to sockeye run size, allow managers to take breaks in sockeye commercial fishing for king salmon conservation and replace the need for prescriptive regulatory changes to time, area and/or gear.
- *Sport Fishery Annual Limit:* Reduced harvest opportunity for large king salmon by limiting anglers to one fish ≥ 28 inches per year. Protecting large, fecund king salmon and safeguarding the reproductive potential of the stock.

While it is not possible to assess the long-term benefits of the plan after only three years given king salmon lifecycles span 4 – 7 years, it is possible to determine that the plan worked as intended and allowed managers to increase escapement of both king and sockeye salmon, while still allowing for opportunities for all users. **Commercial harvest was reduced during this period, averaging 4,457 king salmon annually, with a commercial exploitation rate of 10% compared to 23% prior to 2023, marking a 57% reduction in king salmon exploitation. Delays in opening the commercial fishery occurred each year, allowing for additional passage of both king and sockeye salmon, with the number of additional king salmon conserved by these delays ranging from 7,982 to 11,190 fish annually (ADFG comments, Table 61-2).** ADFG operated on the conservative side of the plan each year, but clearly within the plan's bounds, by waiting until the triggers were met via sonar or tower counts even though the plan allows ADFG to open the sockeye fishery when the triggers are *projected* to be met. This amount of leeway for managers is appropriate for a plan governing a stock of concern.

The current plan uses king salmon status and abundance as the primary tool both before and during the commercial sockeye fishery to determine when stricter king salmon conservation is necessary and then uses sockeye abundance to determine how those conservation actions are scaled. There was a fundamental reason the BOF used sockeye abundance as the metric for the triggers to start the commercial fishery, given the poor ability of the sonar or towers to fully count king salmon. The sonar is an index (partial count) because it only covers part of the river channel, and tagging and mark recapture studies documented that in some years, 20%–60% of king salmon in the Nushagak River were not counted by the sonar.

The impact of these proposals on the commercial sockeye fishery would be very harmful and unnecessary given the current plan is working and using the best available information to inform management decisions. ADFG comments state the effect of Proposal 61 is there would be no commercial fishing until 61% of the king salmon run timing was complete and limiting fishing to 12 hours per day during that week would reduce fishing time by 25% - 50%. The amount of foregone harvest is unknown but would be significant. Opening the fishery on a fixed date reduces the department's ability to respond to inseason estimates of run abundance of sockeye salmon.

In sum, the first three years of implementation show the 2023 management plan appears to be functioning as intended. Overall, the plan reduced harvest, delayed fishery openings, reduced fishing time, increased escapements of both king and sockeye salmon, and enhanced protection for large king salmon in the sport fishery. This plan was developed over five years with substantial public, Advisory Committee, and ADFG input, and it has only been in place for three years. Please retain the current comprehensive action plan and continue to evaluate its effectiveness over time. Please oppose Proposals 61 and 62 and any other proposals to the extent they modify the current plan.

Thank you for considering our comments.



Julie Decker
President, PSPA

PC185

Submitted by: Carly Patrick

Community of Residence: Seattle

As a longtime stakeholder in the Bristol Bay fishery I strongly oppose Proposals 61-68. Proposal 61 specifically puts a blanket timeline on a fishing start date with no backing of evidence that it will fix the King salmon run. This would have massive economic consequences on the bristol bay fishing fleet and their families.

PC186

Submitted by: Cody Patrick

Community of Residence: Seattle

I have been fishing in the bay for 15+ years. I have faith that the biologists are able to manage the fishery in the best way for all species. I strongly oppose proposals 61 - 68. I believe that these proposals would have great negative consequences to the bristol bay fleet and do not have near enough evidence that they would be effective as intended.

December 29th, 2025



Alaska Board of Fisheries
Board Support Section
ATTN: BOF Comments
PO Box 115526
Juneau, AK 99811-5526

RE: Opposition to proposals 61, 62, 69, 92

Dear Chair Carlson-Van Dort,

Petersburg Vessel Owners Association (PVOA) is a mixed gear fleet of vessels that operate in State and Federal fisheries in Alaska and the West Coast. PVOA's members participate in fisheries of all gear types and rely on the sound management of fisheries resources to ensure the viability of their businesses and Petersburg as a community. PVOA has taken position on the following proposals for the January 13th-18th Bristol Bay Finfish meeting.

Proposals 61 and 62:

PVOA Opposes proposals 61 and 62. Both proposals 61 and 62 would remove all sockeye escapement triggers from the Nushagak King Salmon Management Plan before the June 28th date. This is a significant shift from the current management plan that was developed under a Board sanctioned working group that balances the needs of protecting the Nushagak kings and the commercial sockeye harvest. While no plan is perfect, the current plan has a well-designed structure with OEGs and escapement triggers that direct when and how to open commercial fishing time for the drift and set net fleets. A more responsive approach to escape more Chinook is to adjust the OEGs and triggers as opposed to establishing a management plan.

The current management plan has only been in place for three seasons, 2023-2025, while the lifecycle of the Chinook ranges from 4-7 years. The Department has not had an opportunity to assess the true effectiveness of the management plan as no Chinook from the initial brood years have made it back to the river. Creating drastic shifts in management strategy without true cause

will only muddy the waters on effective management for Nushagak kings. The current plan is leading to increased escapement of Chinook up the Nushagak River with a range of 6800-10,500 chinook making it up the river through the three years since implementation.

Proposal 69:

PVOA opposes proposal 69 as written. Proposal 69 uses language from the Nushagak king recovery goal that was drafted but never formalized. Proposal 69 omits language that allows for the Department to relax restrictions and provisions based on escapement data and indices. These omissions would make the proposed recovery plan more dynamic and allow for responsive management to adjust with shifting escapement numbers, allowing the Department to be more agile in their ability to recover the Nushagak kings but also manage a competitive commercial fishery for sockeye. PVOA recognizes the reality of the Nushagak king salmon stock and support a recovery goal plan that takes a more wholistic approach to the needs of the kings and the commercial fishery in the Nushagak District.

PVOA believes that the following provisions on restrictions should be included in any Chinook recovery plan that is developed for the Nushagak:

“2. Restrictions - Management restrictions may be relaxed based on king salmon run timing and if catch and harvest data indicate restrictions are no longer needed to ensure the escapement goal is met.

3. Restrictions - If two consecutive years of escapement are near or above the upper bound of the escapement goal range, management restrictions may be relaxed or set aside using EO authority¹.”

These provisions were originally included in the 2023 draft and create more flexibility in the recovery plan and do a more complete job of allowing for flexibility by the Department, as the Nushagak is an incredibly unique river to manage with not only a chinook population but also record setting sockeye returns.

Proposal 92:

PVOA opposes proposal 92. Proposal 92 would restrict late season commercial fishing opportunity in the Naknek-Kvichak District. This proposal would restrict the Department’s ability to manage the Naknek-Kvichak District in a responsive manner to catch and escapement indices. Proposal 92 is also not written in response to a management need that would necessitate the early closure of a commercial fishery that is relied upon by many fishermen to round out their seasons.

¹ ADF&G, Staff comments on commercial, personal use, sport and subsistence regulatory proposals; committee of the whole groups 1-4 for Bristol Bay Finfish (2025)

Thank you for the opportunity to express our positions on proposals for the Bristol Bay Finfish Board of Fisheries Meeting. Please reach out if you have any lingering questions.

Thank you,

Nels Evens,

Executive Director,

Petersburg Vessel Owners Association

Submitted by: Arthur Peterson
Community of Residence: WA

Oppose Proposals 44, 61-68.

Subject: Comments on 2025/2026 Bristol Bay Finfish Proposals

Dear Chair Carlson-Van Dort and Members of the Board,

My name is Torin Pfundt and I am a drift gillnetter in Bristol Bay. I am writing to share my positions on several critical proposals for the upcoming January meeting.

I strongly **OPPOSE Proposals 61 and 62**. These proposals would remove critical sockeye escapement triggers before the June 28th date. This plan was developed by a sanctioned working group to balance king salmon protection with commercial sockeye harvest.

- **Premature Changes:** The current plan has only been in place for three seasons (2023–2025), while the Chinook life cycle is 4–7 years.
- **Maintain Stability:** Drastic shifts in management before a full generation of fish has returned will only "muddy the waters" regarding the plan's true effectiveness.

I also **OPPOSE Proposal 69 as written**. Any recovery plan must be dynamic and responsive. I support including provisions that allow management restrictions to be relaxed based on real-time escapement data and indices to ensure the Department remains agile in managing both king recovery and a competitive sockeye fishery.

I **OPPOSE Proposal 92**. This proposal would unnecessarily restrict late-season commercial fishing opportunities in the Naknek-Kvichak District. There is no demonstrated management need that justifies closing a fishery that many fishermen rely on to "round out" their seasons. It would also hinder the Department's ability to manage the district responsively based on catch and escapement indices.

I urge the Board to maintain the current management structures that were developed through careful stakeholder collaboration. Thank you for the opportunity to express my positions.

Sincerely,

Torin Pfundt

F/V Buckwild

Submitted by: Ryan Pitcher

Community of Residence: Pocatello, Idaho

Dear Board Members,

I am writing in strong support of Proposal 102, which seeks to achieve a more fair, balanced, and biologically sound management approach for Chinook (king) salmon on the Togiak River. I have guided in Alaska for 23 years, owned a fishing lodge, and devoted my career to responsible stewardship of our fisheries. With Chinook numbers in the Togiak River declining in recent years, I am in full support of well-designed regulatory adjustments that are essential to protecting escapement and ensuring long-term sustainability.

Over the past three years, the sport-fishing sector has carried a large share of the conservation burden for Chinook salmon. We have supported the prohibition on retaining Chinook larger than 20 inches, the gear restrictions, and the ban on bait during the early part of the Chinook run. These regulation changes have significantly reduced sport-fishing impacts on the Togiak River's Chinook. These measures have likely contributed to improved escapement and demonstrate that anglers and guides are willing to do what is necessary for conservation.

However, under the current management structure, commercial and subsistence harvest of Chinook is still permitted, even if incidental or mitigated through gear limits and time-and-area restrictions. While commercial and subsistence regulations do help reduce the take of Chinook through mesh-size limits, net-length restrictions, fishing-period constraints, subsistence fin-clipping requirements, and emergency-order authority; they do not fully eliminate Chinook harvest. The result is an uneven distribution of conservation sacrifice, with the sport-fishing sector carrying a disproportionate share.

For this reason, I support the adjustments outlined in Proposal 102:

1. Allowing bait on the Togiak River beginning July 11 instead of July 16.

This modest five-day shift still protects early-running Chinook while allowing anglers to use prawns to target sockeye slightly earlier. The closure to Chinook harvest has required the sport-fishing community to focus efforts on the retention of other species, specifically sockeye. Historical data show that there are fishable numbers of sockeye in the system by July 11, and sockeye are the primary species of interest during this period. This change would not materially increase pressure on Chinook due to the ongoing prohibition on retaining large kings.

2. Moving the upper boundary for targeting Chinook from the Gechiak River to the Pungokepuk River.

The regulation changes for sport fishermen have significantly reduced sport-fishing impacts on Chinook. The limited entry of commercial operations in the Togiak Wildlife Refuge also restricts guided sport-fishing activity above the Pungokepuk (Pongo). Escapement studies from 2009–2012 indicate that a large percentage of Chinook spawning occurs upstream of the Pongo River. This adjustment therefore improves regulatory clarity, enhances enforcement, and maintains reduced angling pressure in sensitive spawning areas.

Both of these changes are consistent with conservation, improve enforceability, and better balance the management burden among user groups.

As someone with decades of experience on the Togiak River and a long-standing commitment to protecting Alaska's salmon runs, I believe these changes will help maintain the health of the Chinook population while ensuring fairness among the major user groups.

I respectfully urge the Board to adopt Proposal 102.

Thank you for your time and your continued service to Alaska's fisheries.

Regards~

Ryan Pitcher

PC191

Submitted by: Ethan Pitzman

Community of Residence: Homer

I am a bristol bay fisherman from Homer Alaska, and I do not recommend proposal 44 and proposals 61-69.

PC192

Submitted by: Gordon Pitzman

Community of Residence: Homer, Alaska

I vehemently oppose Proposals 44, 61-68. I ask you to please leave the plan unchanged. These proposals would substantially restructure the Management Plan before it has been in place long enough to evaluate over a full Chinook generation. Changing the structure of the plan now would reset the clock, undermine one of the most thorough stakeholder processes the Board of Fisheries has ever directed and reduce management flexibility. Thank you!

PC193

Submitted by: Ian Pitzman

Community of Residence: Homer, Alaska

Chairman and members of the Board of Fisheries;

My name is Ian Pitzman, I am a lifelong Alaskan resident and reside in Homer Alaska. I fish in Bristol Bay in the drift fishery and often register in the Nushagak District. I am writing today in opposition to Proposals 44, 61, 62, 63, 64, 65, 66, 67, 68, and 69. All of these proposals seek to change the management plan to the detriment of the sockeye harvest without allowing for time for the effectiveness of the very recent changes made to be understood. How these changes would help Chinook is unclear, but what is clear and evident is that they would have a strong negative effect one of the most significant local economic drivers in the region. I encourage the board to use sound science and methodology in this discussion and take care to avoid overcompensating. I recommend leaving the plan unchanged.

Submitted by: David Quashnick

Community of Residence: Astoria Oregon

I just want to say I am in favor of proposals 75 76 77 78 permit stacking needs to be implemented like it is in other fisheries in Alaska!!

Submitted by: Richard Quashnick

Community of Residence: Naselle Washington

Response to 41 I have personally fished Bristol bay for 40 years now, I know this is a very sore subject, but someone needs to explain to me why the trawl industry is not effected in this problem with king salmon. There bycatch numbers pretty much go unchanged while they talk about closing our seasons down. So maybe someone could explain to our friends to the west and some gillnet fisheries why they are being closed with no effect on the trawl bycatch. There bycatch numbers might be going down and the reason is because there is less to catch. We have seen the trawl industry wipe out our juvenile halibut, now the salmon stocks are at a very concerning level. There hasn't been a directed fishery on kings in at least 15 years which is 3 full cycles. I do appreciate all the board members time, my only hope is that we do something about the bycatch before it's too late. Thank you Rick Quashnick

Submitted by: Neal Quigley

Community of Residence: Washington state

Proposal 102

I am in full support of proposition 102, I have been fishing the Togiak River for a number of years and believe that this Proposal would have no impact on what I have seen as a strong and growing return of all species throughout the system

Thank you for your consideration

Yes on proposition 102.

Submitted by: Joe Radakovich

Community of Residence: West Linn, OR

I am writing to voice my support for Proposal 102 which is scheduled to be discussed at the Jan 2026 meeting

Moving the chinook fishing boundary to the Pongo makes the most sense for law enforcement and anglers. It will help prevent confusion and allow for undisturbed spawning areas for the fish.

Thank you for your time.

Joe Radakovich

Submitted by: Jamison Ramsey

Community of Residence: Ketchikan, AK

I jamison ramsey bristol bay permit holder and boat owner for 30 years oppose proposals 44,61,68 for nushagak district for various reasons

PC199

Submitted by: Tyone Raymond

Community of Residence: Vashon, Washington

Greetings,

My name is Tyone Raymond, and I've been a Bristol Bay drift fisherman since my father started me in 1978. I now run the "Mr Fox", a single engine jet boat that I built in 2012.

I'd like to express my opinion about a few of the proposals.

Proposal # 44.

While I support efforts to limit the harvest of Nushagak Kings, limiting the number of fish kept for personal use by commercial fishermen is not going to change the number taken overall. None of us target Kings for this purpose, and yet there is incidental bycatch that is unavoidable in a gillnet fishery, so I do not support this proposal.

Proposal # 56.

I support keeping the seaward boundary as it is presently as it is, and not allowing it to be based on mean high and low tide, as these allow for more variability. As a drift fisherman trying to keep a legal and reasonable distance from set net gear, anything that brings consistency is helpful.

Proposal # 57

I am against the additional language that forbids explicitly contact with set net gear because in my experience, contact and entanglement is absolutely undesirable from either perspective, and further penalizing what is generally accidental will not solve the issue. It will undoubtedly add further stress to an already stressful situation. The majority of problems of this kind occur when there is a strong onshore wind, and often in the dark when the visibility is poor. There are times when a vessel might lose power, or otherwise have a problem that causes them to drift into set net gear by accident, and adding penalty to this will not help reduce these accidental situations.

proposal # 72

I support a general district for late season for the reasons expressed in the proposal.

Proposals # 75,76,77,78

I support permit stacking in which a single person can own or operate two permits provided the maximum amount of gear per vessel will remain 200 fathoms. I do not support the concept of an "E" permit. By keeping permits separate, it will allow for adjustments in the fleet numbers depending on economic conditions. It can also allow for an important dynamic in which a family member or crew member can enter the fishery using one of the permits, again bringing both vessels to single permit

status. It gives flexibility. Additionally, the point made about the undue burden placed on a "D" permit holder, which is often a crew hand, or family member, is unfair should the operator of the vessel have a violation, should be addressed.

Proposals # 83, 84

I support changing the 32' limit since as stated, the vessels built now are radically different than when the law was enacted. The idea that smaller boats would keep it egalitarian is obviously a thing of the past, since much machinery is crammed into the 32 feet these days, and the competition is ever fiercer. The older, smaller fleet is largely already phased out and sits mainly up on blocks growing weeds.

There are multiple arguments for increasing the length:

A larger platform will be safer in bad weather, and provide more room to work.

It will be easier to focus on various aspects of quality, since there will be more room to place refrigeration machinery, insulation, carry additional water to float fish, etc.

More length will be more efficient in traveling through, or on the water. Building a vessel that maximizes efficiency will be possible, instead of simply adding more horsepower.

Proposal # 81

I support attempt at using another gear type in Bristol Bay, since obviously gill netting while effective, is not great for quality.

Thank you for considering these comments.

Tyone Raymond

F/V Mr Fox

[REDACTED]

PC200

Submitted by: Michelle Reakoff

Community of Residence: Petersburg

Dear Members of the Alaska Board of Fisheries,

My name is Michelle Reakoff. I am a lifelong Alaskan and a multi-generational Bristol Bay commercial fisherman. My family is from Bristol Bay, and I have spent over 40 years in the region and fishery. I hold both drift and set gillnet permits. I submit the following comments in response to the Bristol Bay Finfish proposals, with positions clearly identified.

My perspective is grounded in the understanding that effective fisheries management must account for more than biology alone. Long-term conservation success depends on maintaining biological sustainability, economic viability, enforceable management, and the political strength necessary to protect the fishery as a public resource.

****Proposal 44 – Subsistence Chinook Limits and Reporting****

****Position: Oppose****

I oppose Proposal 44. Subsistence use is a priority use in Alaska and should not be regulated as a symbolic conservation measure absent clear evidence that it will materially improve escapement outcomes. Without an established Amount Necessary for Subsistence (ANS) for Chinook in the Nushagak, imposing new limits risks increasing social conflict while failing to address the primary drivers of Chinook decline.

Shifting conservation burden onto subsistence users does not strengthen the fishery and risks undermining long-term public support for conservation measures.

****Proposals 61 and 62 – Additional Commercial Restrictions Under Nushagak Chinook SOC Conditions****

****Position: Oppose****

I oppose Proposals 61 and 62. The commercial drift fleet has already absorbed substantial conservation burden through delayed openings, reduced fishing time, and increased enforcement pressure under the existing Stock of Concern framework. Chinook escapement shortfalls have occurred even in years with minimal commercial harvest, indicating that factors beyond fishery interception are influencing stock status.

Further automatic restrictions risk compounding economic harm without providing demonstrable conservation benefit and reduce management flexibility in responding to real-time conditions.

****Proposals 63, 65, 66, 67, and 68 – Expanded or Extended Restrictions Under SOC Conditions****

****Position: Oppose****

I oppose these proposals. Locking additional time, area, or method restrictions into regulation concentrates conservation burden on the most regulated and enforceable user group while offering uncertain additional benefit. Rigid measures reduce the ability to adapt management to tides, weather, and fish behavior, and increase congestion, safety risk, and operating costs for the drift fleet.

****Proposal 64 – Allocation Changes During Chinook Stock of Concern Conditions****

****Position: Oppose****

I oppose Proposal 64. Conservation designations should not be used to restructure allocation among user groups. Allocation changes implemented under Stock of Concern conditions risk becoming permanent precedent unrelated to conservation effectiveness and undermine long-standing access frameworks.

****Permit Stacking Proposals (75–78)****

****Position: Support****

I support permit stacking within a gear group. Permit stacking improves safety, operational efficiency, and economic viability for working fishermen without inherently increasing conservation risk. Given existing time and area limitations, stacking does not equate to proportional increases in harvest, but it does allow permits to remain active and the fleet to remain viable.

Vessel Specification and Length Proposals (83–85)

Position: Support

I support reasonable modernization of vessel specifications, including vessel length. Modern vessels improve safety, efficiency, and fish quality. Restricting vessel modernization does not protect fish, but it does erode fleet viability and increases costs in an already constrained operating environment.

Broader Management Considerations

The commercial drift fleet provides the majority of enforcement accountability, biological data, and economic value that supports Bristol Bay management. As cumulative restrictions continue to concentrate on this fleet, fishing grounds are reduced, operating windows shrink, fuel costs increase, and economic viability declines.

If commercial viability is eroded, pressure does not disappear. It shifts. Access and influence move toward less regulated sectors, enforcement becomes more difficult, and the political capacity to defend Bristol Bay as a valuable public resource weakens. Long-term threats to the fishery do not disappear simply because they are quiet at the moment, and maintaining a strong, valuable commercial fishery is essential to protecting Bristol Bay against future industrial, political, and economic pressures.

Conservation succeeds when the fishery remains biologically healthy *and* economically and politically resilient.

Closing

I respectfully urge the Board to evaluate these proposals cumulatively and to avoid further regulatory changes that undermine commercial viability without clear, measurable conservation benefit. Protecting Chinook salmon and protecting the fishery itself are inseparable goals.

Thank you for your consideration.

Respectfully,

Michelle Reakoff

Bristol Bay Commercial Permit Holder (Drift & Set Gillnet)

PC201

Submitted by: Avtanom Reutov

Community of Residence: Homer, Alaska

I strongly oppose proposal 44, 61-68.

Submitted by: David Reutov

Community of Residence: Homer, Alaska

David Reutov on the f/v Typhoon

Bristol Bay fisherman of 8 years.

I oppose proposals 44, 61-68.

Closed fishery before June 28 would be a great financial loss and impact our lively hood by not harvesting upwards of 7 million fish and over escape the rivers, which in turn would impact the return runs for the future.

PC203

Submitted by: Julian Reutov

Community of Residence: Homer

My name is Julian reutov and I commercial fish in Bristol bay to provide for my family. I oppose proposal 44, 61-68 because all of these proposals would limit me to fish an already short season and over escape the rivers like crazy. I fish in the Nushagak river almost every year and I barely catch any kings if any because the kings run a bit earlier. Instead of limiting us to fish and over escaping the rivers I think the board of fish should limit the trawlers on how much kings they can dump over board and only maybe then our kings will return. Thanks.

PC204

Submitted by: Mark Reutov

Community of Residence: Homer

Do close nush

PC205

Submitted by: Philip Reutov

Community of Residence: Homer

As a fisherman and drift permit holder of bristol bay i oppose the propositions of regulatory changes to Nushigak and Naknek districts.

PC206

Submitted by: Trifilyi Reutov

Community of Residence: Homer

Hello to all Staff and Board Members.

Iam a Bristol Bay fisherman for 28 years and my family. I would like to Oppose Proposal 44 and 66 to 68 Please leave it unchanged. Leave it as is or it will take a lot of reduced time out of our fishery and big percentage of our income. So iam asking Please leave it as is. Thank you.

From: Scott Raborn [REDACTED]
Subject: PMTF Catch Update #12, June 21, 2025
Date: Jun 21, 2025 at 10:43:04 PM
To: [REDACTED]



Port Moller Test Fish Catch Update

Catch Update #12, June 21, 2025

PMTF Catch Update Table

PMTF Raw Data

Good evening,

Yesterday, we reported that the R/V St. Andrew was only able to fish at Station 4. However, the crew managed a late set at Station 8 as well, yielding a sizeable index of 234.

Today, the vessels successfully covered all but Station 2. The fish band between Stations 6 and 10 remains robust, and catch indices at the outer stations have increased significantly.

So far, the catch indices at Port Moller suggest the run might be larger than forecasted or arriving earlier than observed in recent years. The current data provide no indication that the run is significantly late or smaller than forecasted.

PMTF Stock Composition Status: If weather permits, the June 19-20 stock composition should be released tomorrow.

Index by Station

S2: Not fished

S4: 44

S6: 216

S8: 143

S10: 79

S12: 0

S14: 24

S16: 19

S18: 90

S20: 91

S22: 58

S24: 38

Daily Catch Index = 70

Jordan and Scott

Useful Links & Project Info

PMTF Website Project Page ([Click Here](#))

BBSRI Inseason Data Page ([Click Here](#))

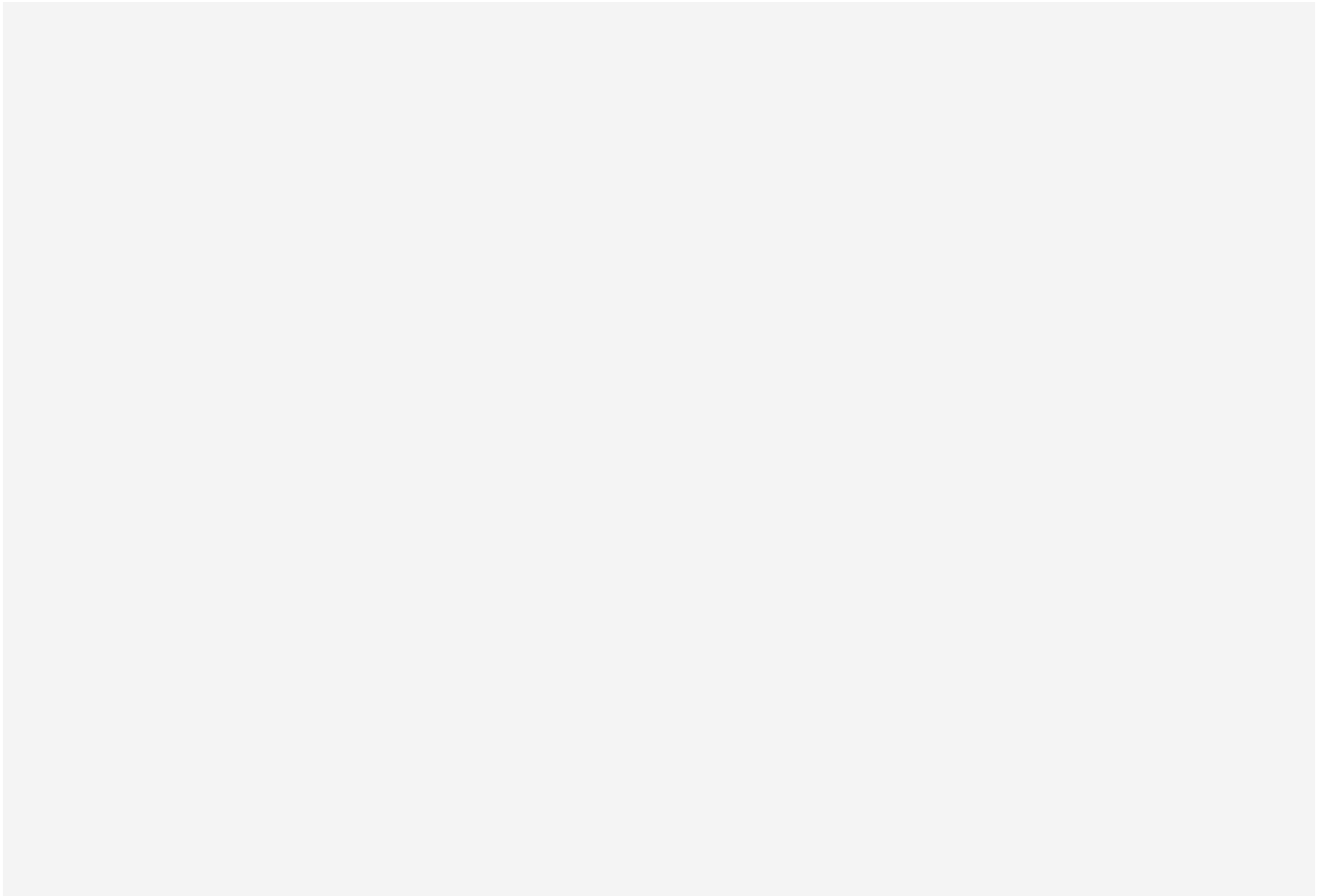
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Community of Residence: Ekuk

I want to support proposals 56,57,80 but do not support the King Salmon management plan. In my opinion the issue is on the high seas and making salmon fishermen in the Nushagak district sit on the beach while a few King Salmon swim by to allow the sport fishermen to decimate them once they get in river is ludicrous. Catch and release doesn't work either. And while I'm at it stop the subsistence targeting the biggest King Salmon they can catch. If it's truly about subsistence then let them fill their freezers and smokers with Red Salmon. In conclusion the damage to the Kings started in the late 80s and continues to this day and it's all done with the Trawler fleet. Not all of them are under your jurisdiction. This is a problem for the Federal Government and it will take a half century to correct.

Submitted by: Joel Reynolds

PC208

Ekuk Beach Fisherman's Association

Community of Residence: Ekuk, Alaska

Alaska Board of Fisheries – Bristol Bay Finfish Meeting

Madam Chair and Members of the Board,

My name is Joel Reynolds and I am a set-net permit holder fishing on Ekuk Beach in the Nushagak District. I have been fishing Ekuk beach since the 1980's. I submit this comment as a member of the Ekuk Beach Fishermen's Association (EBFA) and as someone whose livelihood and family depend on a safe, fair, and sustainable Bristol Bay fishery.

Support for Proposal 56: Predictable Spatial Boundaries

I support Proposal 56, which would make Ekuk's coordinate-based offshore set-net boundary permanent. Adopted by the Board in 2022, this boundary has been working successfully as a clear, predictable, and enforceable seaward limit. Making it permanent provides certainty for set-net placement, drift operations, and enforcement in a high-density fishing area.

Support for Proposal 57: Orderly and Safe Fishing

I support Proposal 57, which establishes the same boundary as a shoreward limit for drift gear and prohibits contact with set-net gear. This proposal reduces entanglement risk, gear loss, and unsafe nearshore interactions by clearly defining spatial limits and updating set-net gear definitions. As the drift fleet has grown significantly in size and horsepower, these clear, enforceable rules are essential to maintaining an orderly and safe fishery.

Support for Proposal 80: Joint-Venture Set-Net Operations

I support Proposal 80, which allows limited joint-venture set-net operations under defined conditions. Joint ventures help small, family-based sites adapt to short openings, rising costs, and safety challenges without increasing fishing footprint or promoting consolidation. This approach has worked successfully in Kodiak set-net fisheries for over four decades.

Economic and Community Impacts of Missed Allocation

In recent years, set-net fishermen in the Nushagak District have consistently fallen far short of the Board-adopted 26% set-net allocation. These shortfalls, in harvest share and time, have real consequences for fishing families, local processing, and watershed communities like Ekuk. When

allocation exists on paper but is not achieved in practice year after year, the economic and social fabric of Bristol Bay communities is weakened.

Together, these requests are important steps toward equitable harvest share in practice, not just on paper.

Proposals 56 and 57 reduce conflict and safety risks that disproportionately impact onshore set-net fishermen; and Proposal 80 provides limited flexibility for small operations to adapt to shortened and more complex fishing opportunities. These measures help ensure that set-net fishermen in the Nushagak District have a fairer opportunity to sustain our fishing families and watershed communities over the long term.

Thank you for your consideration and for your service to Alaska's fisheries and fishing communities.

Respectfully submitted,

Joel Reynolds

Ekuk Beach, Nushagak District

PC209

Submitted by: Kim Rice

Community of Residence: Girdwood, Alaska 99587

Proposal 80

Our family fishes 4 Bristol Bay setnet permits in the Egegik district. We have been Set netting in Egegik since 1987. We strongly support Proposal 80. This is not permit stacking. Proposal 80 would allow 2 setnet permit holders to form a coop together and be able to sell their catch on 1 permit. Example: one permit holder is in skiff and sells to tender that is anchored off our site while the other permit holder is picking another net and delivers to Beach market, at this point, fish are mixed between the 2 permits.

Example: I'm a 75 year old permit holder, I would form a co-op with my Daughter, she runs the single skiff that we fish out of. I fish the beach nets, she fishes the outside nets and delivers to floating tenders, I fish the beach nets and deliver to beach market, fish are mixed at this point. My wife's permit would be co-oped with my son-in-law to do the same. He fishes out of same skiff that my daughter runs. we fish the 4 permits at same time, fish get mixed up sometimes. I hope that Board of Fish will pass Proposal 80. I will be at the BOF meeting in January, I plan on speaking to all Board members at that time. I am a member of the Lower Bristol Bay Advisory Committee, our committee passed prop. 80

Thank You

Kim Rice

PC210

Submitted by: Lawrence Richmann

Community of Residence: Hunters Run

I believe that the king salmon boundary line should be moved to the pongo boundary line due to the fact we are on a catch and release program and most spawning grounds are above the pongo boundary line

PC211

Submitted by: Daniel Riggsbee

Community of Residence: Pittsboro NC

I am a drift boat captain and a drift permit holder. I strongly oppose proposal 57 creating an out of bounds area for drift boats, even when set nets aren't fishing, is absurd, especially in an area that historically catches alot of fish.

PC212

Submitted by: Jace Rinker

Community of Residence: Bristol bay permit holder

This part of the fisheries is in good order. No need to change dramatically. This would effect all nush fisherman and other river systems due to extra pressure.

PC213

Submitted by: Nathan Rispler

Community of Residence: oregon

support for proposal 81. I believe we are in competition for the best quality fish on the market and we need to explore all options to achieve that.

PC214

Submitted by: Amanda Roberts

Community of Residence: Anchorage

Proposal 52 Oppose. The upper area of Egegik should not be fished by drift or setnet. It would give unfair advantage to jet boats, and the river is too narrow to fish. It would give the opportunity for boats to cut off the whole river, possibly damaging small runs of fish that go into different tributaries. This is a terrible idea.

PC215

Submitted by: Jeremy Roberts

Community of Residence: Anchorage

You don't need extra river space when there is not enough boats as it is.

Submitted by: Matt Rockness

Rockin Fisheries

Community of Residence: Gig Harbor WA

I am opposed to this proposal. Maintaining control of escapement is paramount to future runs. The dates proposed are detrimental to controlling the escapement in all Nushagak rivers

Submitted by: Tom Rogotzke

Community of Residence: Hutchinson, MN

Dear Members of the Alaska Board of Fisheries,

My name is Tom Rogotzke, I have been a drift gill net fisherman in Bristol Bay for 27 years and I am submitting written testimony regarding the following proposals. Almost all of my time has been spent fishing in the Nushagak district along with my brother, and my uncle, and dad, who all own their own boats.

I oppose Proposals 44 and 61–68 to the extent that they would modify the Nushagak District King Salmon Stock of Concern Management Plan.

The SOC plan was developed through a multi-year, stakeholder-driven committee process involving commercial, subsistence, and sport users, Advisory Committees, and the Alaska Department of Fish and Game.

The plan has only been in place for three fishing seasons and was not expected to produce immediate biological recovery given the 4–7 year life cycle of Chinook salmon. These things take time.

From a fisherman's perspective, it appears that the chinook population is stable and possibly slightly higher than in the previous few years. My family and I all release any chinook we find in our nets that are healthy enough to continue up the river. I've heard of this same thing being done by a broader group of people we fish with.

Available analyses indicate the plan is functioning as intended by delaying commercial openings, reducing fishing time during peak Chinook vulnerability, reducing exploitation of king salmon in the commercial fishery, and increasing escapement prior to harvest exposure.

I respectfully request the Board allow the plan to remain unchanged and be evaluated over a full Chinook generation. Please give this a few more years to play out. The population is steady. Stick with the original plan.

Sincerely,

Tom Rogotzke

F/V Katie Blue

Submitted by: Tom Rollman

Community of Residence: Eagle River

Proposal 61 - OPPOSED

Proposal 62 - OPPOSED

Subject: Written Testimony – Board of Fisheries Proposals

Dear Members of the Alaska Board of Fisheries,

My name is Tom Rollman and I am a setnet fisherman in Bristol Bay and I am submitting written testimony regarding the following proposals.

I oppose Proposals 61 and 62 to the extent that they would modify the Nushagak District King Salmon Stock of Concern Management Plan.

The SOC plan was developed through a multi-year, stakeholder-driven committee process involving commercial, subsistence, and sport users, Advisory Committees, and the Alaska Department of Fish and Game.

The plan has only been in place for three fishing seasons and was not expected to produce immediate biological recovery given the 4–7 year life cycle of Chinook salmon.

Available analyses indicate the plan is functioning as intended by delaying commercial openings, reducing fishing time during peak Chinook vulnerability, reducing exploitation of king salmon in the commercial fishery, and increasing escapement prior to harvest exposure.

I respectfully request the Board allow the plan to remain unchanged and be evaluated over a full Chinook generation.

Sincerely,

Tom Rollman

Nushagak Setnetter

Submitted by: Lauri Rootvik

Dennis and Lauri Rootvik/ Laurden and associates

Community of Residence: College Place, Washington/ Ekuk beach during the summer

I am a life-long Ekuk Fisherman interested in protecting and enhancing the fishery for Set-net fishermen on the Ekuk beach. I have submitted concerns to the board especially re. the Chinook management plan and the Set-net allocation, as well as the boundary limits being enforced to allow Set-net operations to continue without drift fishermen encroaching within the boundary limits.

EBFA Member Public Comment Template

Alaska Board of Fisheries – Bristol Bay Finfish Meeting

Madam Chair and Members of the Board,

My name is Sonja Rootvik Ewing, and I am a third-generation, lifelong set-net fisherman on Ekuk Beach in the Nushagak District. I submit this comment as a member of the Ekuk Beach Fishermen's Association (EBFA) and as someone whose livelihood and family depend on a safe, fair, and sustainable Bristol Bay fishery.

Allow the Nushagak Chinook Management Plan to Complete a Full Life Cycle

I support allowing the Nushagak Chinook Management Plan to work without pre-emptive alterations. Chinook are long-lived fish with a life cycle of seven years, and meaningful evaluation of conservation outcomes requires time and consistency. This plan was developed through a multi-year, Board-convened stakeholder process and adopted unanimously in 2023. Re-setting management in the middle of the Chinook life cycle creates instability for fishing families and undermines the ability to evaluate whether the plan is working.

Support for Proposal 56: Predictable Spatial Boundaries

I support Proposal 56, which would make Ekuk's coordinate-based offshore set-net boundary permanent. Adopted by the Board in 2022, this boundary has been working successfully as a clear, predictable, and enforceable seaward limit. Making it permanent provides certainty for set-net placement, drift operations, and enforcement in a high-density fishing area.

Support for Proposal 57: Orderly and Safe Fishing

I support Proposal 57, which establishes the same boundary as a shoreward limit for drift gear and prohibits contact with set-net gear. This proposal reduces entanglement risk, gear loss, and unsafe nearshore interactions by clearly defining spatial limits and updating set-net gear definitions. As the drift fleet has grown significantly in size and horsepower, these clear, enforceable rules are essential to maintaining an orderly and safe fishery.

My family and I fish on Flounder Flats, where the tide comes in and out hundreds of feet per tide. As such, we put our pegs and buoys out about 1,000 feet into the mud at the beginning of the season. As the regulations are currently written, a drift fisherman can drive across any part of our lines as long as they don't touch our actual net. We only have 300 feet of net (50 fathoms), but 700 feet of very important rope and gear holding our nets in place. When a boat drives over those lines, many issues can happen. Lines can be cut, making nets float hundreds more feet away from shore, a very difficult and dangerous problem for us to remedy. Buoys can be pulled off the pegs, making an expensive and time-consuming problem for us to fix.

Proposal 57 would help ensure these safety issues do not happen, protecting us fishermen on the beach, as well as the drift fishermen in their boats.

Support for Proposal 80: Joint-Venture Set-Net Operations

I support Proposal 80, which allows limited joint-venture set-net operations under defined conditions. Joint ventures help small, family-based sites adapt to short openings, rising costs, and safety challenges without increasing fishing footprint or promoting consolidation. This approach has worked successfully in Kodiak set-net fisheries for over four decades.

As a small family operation, my family owns two permits and fishes on the flats about 5 miles from our processing plant. That is about a 30-minute drive by truck. We share crew between the two sites. A joint-venture operation would be incredibly helpful for our operation. For example, if we have a lot of fish, Prop 80 would allow just one permit-holder to drive down the beach to deliver fish, while the second permit holder could stay and help the rest of the crew finish picking and loading the second site, rather than having two main members of the operation be gone for at least 1.5 hours in the middle of a tide. This not only impacts our crew resources, but also helps with fish quality, as they can be dealt with and delivered much faster with more hands “on deck”. It also helps save fuel, because we could deliver in one truck if we have a smaller catch.

I heard someone argue that this would allow set-netters to catch more fish, which is very untrue, at least in my family’s case! When the tide goes out, it’s out, and there are no more fish to catch. Proposal 80 would simply make it a lot easier for our small, two-permit operation to work together, and would reduce the strain of having each permit-holder deliver fish separately on every trip.

Economic and Community Impacts of Missed Allocation

In recent years, set-net fishermen in the Nushagak District have consistently fallen far short of the Board-adopted 26% set-net allocation. These shortfalls, in harvest share and time, have real consequences for fishing families, local processing, and watershed communities like Ekuk. When allocation exists on paper but is not achieved in practice year after year, the economic and social fabric of Bristol Bay communities is weakened.

Together, these requests are important steps toward equitable harvest share in practice, not just on paper. Allowing the Chinook Management Plan to complete at least a full life cycle before considering alterations to the plan encourages participation and trust in conservation management; Proposals 56 and 57 reduce conflict and safety risks that disproportionately impact onshore set-net fishermen; and Proposal 80 provides limited flexibility for small operations to adapt to shortened and more complex fishing opportunities. These measures help ensure that set-net fishermen in the Nushagak District have a fairer opportunity to sustain our fishing families and watershed communities over the long term.

Thank you for your consideration and for your service to Alaska’s fisheries and fishing communities.

Respectfully submitted,

Sonja Rootvik Ewing

Ekuk Beach, Nushagak District

Submitted by: Andrew Rosas

Community of Residence: Port townsed

I am submitting this comment in opposition to propositions 44 and 61-68. Additional restrictions of soceye fishing in the nushagak to protect the king salmon return is un warranted without more data to prove that is working. There are many things that are affecting poor king salmon returns including trawling by catch subsistence fishing as well as sport fishing. None of which have seen the same scrutiny that the bristol bay fleet has. Also preventing the fleet access to early soceye will continue to over escape the nushagak river at unprecedented levels. Very been a bristol bay drift fisherman since 2005 and I believe king salmon are very important the declining returns are not the result of of drift and set fisherman catch and untill the problem can be isolated and more data can be gathered it is unacceptable to further limit soceye fishing in the nushagak district. Thank you.

Submitted by: Erick Sabo

Community of Residence: Arizona

Dear Members of the Alaska Board of Fisheries,

My name is Erick Sabo, I am a drift gill net fisherman in Bristol Bay and I am submitting written testimony regarding the following proposals.

I oppose Proposals 44 and 61–68 to the extent that they would modify the Nushagak District King Salmon Stock of Concern Management Plan.

The SOC plan was developed through a multi-year, stakeholder-driven committee process involving commercial, subsistence, and sport users, Advisory Committees, and the Alaska Department of Fish and Game.

The plan has only been in place for three fishing seasons and was not expected to produce immediate biological recovery given the 4–7 year life cycle of Chinook salmon.

Available analyses indicate the plan is functioning as intended by delaying commercial openings, reducing fishing time during peak Chinook vulnerability, reducing exploitation of king salmon in the commercial fishery, and increasing escapement prior to harvest exposure.

I respectfully request the Board allow the plan to remain unchanged and be evaluated over a full Chinook generation.

Sincerely,

Erick Sabo

F/v Insanity

Submitted by: Ed Saffer

Community of Residence: Spokane, WA

“I support Proposal 102. The bulk of king salmon spawning on the Togiak occurs above the Pongo, and no lodges operate above that point. Moving the boundary to the Pongo is logical and will help streamline enforcement from Troopers”

Submitted by: Konrad Schaad

Community of Residence: Homer Ak

- Opposed to proposals 48 and 49. Micro managing for any gear group that feels short changed gets very complicated and cumbersome. We need to let the biologists focus on biology first and not burden them anymore with special wishes.

-Strongly opposed to proposals 61, 62, 64, 65, 66, 67, 68, 69. They make no sense until we have an accurate way to count kings. Tim Sands is doing a great job; we don't need to tie his hands any further to achieve the best possible outcomes.

-Support proposal 70; Diffuse the Ugashik Northline by giving more space to fishing boats.

-Strongly support #71, 72, 73, 74. Late season when all districts achieved or exceeded their escapements, and enforcement is usually gone, it makes no sense to corral the fleet in districts where a few boats that push the boundaries are "rewarded" with higher catches. Dispersing the fleet in a general district produces better fish quality and gives equal opportunities to all fishers, and takes pressure of enforcing lines off for the troopers (which don't have the funds to do much at this late time in the season)

-Strongly support proposals 75, 76, and 78; There are too many permits in the Bristol Bay fishery. This is a great way to permanently reduce the fleet. This is a free " buy back". Each D permit eliminates 100 fathoms of fishing nets; a win / win for all.

-Opposed to # 82 and 83; this is nit picking for some special interests. Why not get rid of the antiquated 32ft limit all together?

-Support #84 and or 85; It makes great senses to come up with a length that includes all add ons (anchor roller, power roller, trim tabs, Jets and it's protective pipes). Either no length limit or something that works for all. But if we can't come up with an overall length (no exceptions), we need to clarify the current jumble of what is in, and what not (#85)

-Support proposal 95; Since we lost "free week" we have a lot at stake when we drop our blue cards. This would enable many boats to go test the boat, and the crew.

Submitted by: Cameron Schille

Community of Residence: Stanwood, WA

As a Captain, Boat owner and Permit holder with 21 years experience in Bristol bay's wonderful commercial salmon fishery. I strongly oppose proposals 44, 61-68.

I am asking the board to leave the plan unchanged. These proposals would substantially restructure the Management Plan before it has been in place long enough to evaluate over a full Chinook generation.

Changing the structure of the plan now would reset the clock, undermine one of the most thorough stakeholder processes the Board of Fisheries has ever directed and reduce management flexibility.

Franz Schonberg

F/V Myrna Mae

Public Comment in opposition to Proposal 61

My name is Franz Schonberg, a 30 year old drift commercial fisherman in Bristol Bay who lives in Petersburg, Alaska with my wife Seaira and our 4 month old daughter Dagny. I started drift fishing in Bristol Bay with my father in 2008 when I was 13 years old. He started fishing in Bristol Bay in the early 80's with his brother.

I strongly oppose proposal 61 for many reasons:

1. As BBSRI will share in their report, the commercial drift and set net fleet in the Nushagak has lost on average over 40% on the front end of the most productive sockeye salmon river in Bristol Bay from June 21-July 4th under the current King Salmon Management plan. This period we've given up for king salmon conservation has cost the industry thousands of pounds of sockeye salmon. As an example, if the board eliminated the triggers in 2025 and the fleet did not fish until June 28th, there would have been millions of sockeye salmon up those rivers well beyond the OEG's set in place under the King Salmon Management Plan. Fish do not run in accordance to dates set on a calendar. The biological impact of allowing unprecedented amounts of sockeye to spawn up river has been shown around the state to reduce returning runs. That is why ADF&G sets the escapement goals in the first place, to achieve the balance necessary to maximize harvest and guarantee future runs. These numbers have been achieved by trial and error for a number of generations. Pounds = dollars, lost harvest opportunity negatively impacts local borough tax revenue, state tax revenue and many thousands of downstream players that are involved with bringing this product to market. Mother Nature does not reference dates set on a calendar to decide when they want to swim upriver. The commercial fishermen have compromised in the name of king conservation and given up a lot already, this proposal will further limit the profitability of the industry.
2. The King Salmon life cycle is longer than the 3 year board of fish cycle, meaning the results of our sacrifice have not even been given a chance to yield and study the results.
3. Bristol Bay exists as it is today and has for generations because of this commercial industry, taking legislative action not based on science and results will further disenfranchise those who "start from the bottom". It has already become hyper competitive. With inflation coupled with difficult market conditions, it has been exceptionally difficult to survive the times unless you are in the upper tiers of production. Local Alaskan residents like myself who started from a young age, without

an inheritance or handout will be further disenfranchised. Recruitment into this industry is already a big enough challenge, why make it harder?

4. Bristol Bay Regional Seafood Development Association collects revenue from a 1% tax on all commercial drift net fishermen in Bristol Bay. BBRSDA sent out an RFP this fall to increase sonar capacity near the current ADFG sonar site at Portage Bay up the Nushagak River. BBRSDA is working closely with ADF&G and BBSRI, to fund the installation and oversight of this project with the goal of improving upon a sonar system that was designed to count sockeye salmon. The idea will be to increase sonar capacity and to train an AI model to differentiate species of salmon that are being documented with the additional sonars. This is a difficult task considering the amount of sockeye the Nushagak River has been yielding in recent years and the unique characteristics of the river. The project will begin this summer and will bring together teams of scientists with experience from around the continent working together to solve a problem. This project will cost hundreds of thousands of dollars and require cooperation from many partners. Without the hard-working tax payers of the Drift gillnet fleet, this would not be possible. The state has cut ADF&G budgets significantly in the last decade making their job exceptionally more difficult without proper financial incentive. Our scientists work under extremely stressful conditions with minimal compensation as it is. I have a lot of respect for what they are able to achieve under the circumstances they are under. This project is a great example of industry stepping up to the plate to solve an issue.

It begs the question, what has the sport fish industry done and spent for king salmon conservation in the Nushagak River? Barbed hooks? There are laws all across this state that require anglers use barbless hooks for steelhead runs to improve the likelihood of survival after catch and release. Bait? You can't use scented bait or eggs to catch steelhead because they swallow the hook deeper making extraction highly likely to kill the fish if it is not a legal size.

My great grandfather, Laugi Thorstenson, was counting salmon on a tally scow at Clarks point in the 1940's. During this time Laugi's brother Jonas worked at the Peter Pan plant as a mechanic keeping the "Iron Butcher" running for the cannery. These canned salmon helped feed the Allies in WW2. Though my family was not active in the industry, these canned salmon also helped feed the Allies in WW1.

My 2 older brothers, Johannes and Karl grew up commercial fishing and we all fished together on my dad's boat in Bristol Bay before they went to the Naval Academy. They still serve today as Commanders in the Navy. The experiences we shared together on the back deck of that 32' gillnetter helped set them apart from other candidates and was critical to their development. It

has been critical to the development of many strong and independent leaders of this country for over a hundred years.

At an early age I had a dream to focus on building a family and I wanted to give my unborn children an opportunity to work side by side with their father during their crucial developmental years. There are so few places in the world where you can spend a summer focused on building skills and connections with your children like this. At age 23 I bought my first gillnetter, the F/V Sea Spy a 12' wide Modutech built in 1980. It was a major learning curve and a humbling first couple of seasons that only worked with endless support from processors, fellow fishermen, friends and family and my wife and opportunities to harvest sockeye salmon. I have since upgraded to a 1980 Jumbo Modutech F/V Myrna Mae and continue to rely on successful fishing seasons to support my family along with HVAC and refrigeration work the rest of the year out of Petersburg.

I share this story as an example of the American dream that Bristol Bay has been for my family for generations. I am confident my story will resonate with a lot of folks who commercial fish in Bristol Bay every summer. To come from poverty and be able to work up to the middle class and provide a healthy, beautiful sockeye salmon for the world to eat is a blessing that should not be ignored. This region has been blessed with an abundance of wild sockeye salmon in the last decade and counting. Simultaneously the entire west coast of North America has seen a major decline in King Salmon stocks for reasons science has yet to pin point.

Bristol Bay and the commercial fishing industry has developed leaders in this country for generations. It has fed soldiers during some of humanity's darkest wars, it continues to deliver some of the highest quality protein on this planet to people regionally and internationally, it continues to be a place where independent family oriented folk can achieve the American Dream.

I ask the board of fish to heavily consider the price this industry and the region will pay if this proposal is approved. Consider the 46 permit holders based out of Petersburg, Alaska alone who depend on this fishery to feed their families. Consider the many communities in Alaska that have residents who also depend on this fishery. Consider the economic impacts to the watershed region if the industry continues to lose solvency.

I encourage board members to reach out and ask questions about my story. I will be attending the meetings and look forward to meeting with you all.

with all due respect,

Franz, Seaira and Dagny Schonberg



PC227

Submitted by: Kristian Schonberg

Community of Residence: Allyn, WA

I am a commercial fisherman and have fished Alaskan waters since 1971. In 1983, I started fishing salmon in Bristol Bay. In 2005, I bought a permit and boat, the Ghost rider. I depend on the harvest in the Bay and especially in the Nushagak district. I oppose any change of plan for the management of the system and would hope that our current management plan helps keep the king salmon runs healthy.

PC228

Submitted by: Quinn Selitsch

Community of Residence: Anchorage

My support or opposition to these proposals are marked below. If I have not marked support or opposition for a proposal, this should in no way affect my support or opposition for those proposals I have marked support or opposition for.

PC229

Submitted by: Tristan Selitsch-Hager

Community of Residence: Anchorage

I want to voice my opinion regarding props 61-68. Sports fisherman often times come from out of state and don't really actually care about the fisheries or the towns in which they come to and from. Commercial fisherman have already given up so much fishing time. I remember thinking we didn't have enough time as it was to put in a proper season to financially keep up. I have commercially fished there since I was 16. I recently bought a Bristol bay boat this year so I do have skin in the game, however the past five years at least, every king we've caught in Bristol bay that is alive, we let free to have a shot of getting up there river. I am an active member in all sorts of communities and fisheries over Alaska, from anchorage to Akutan. I feel like the sports fisherman will just keep taking as much as they can get and will never be satisfied. You give an inch and they ask for mile. Enough has to be enough eventually. Thank you

PC230

Submitted by: Cameron Severson

Community of Residence: Petersburg AK

My name is Cameron Severson, 4th generation commercial fisherman from Petersburg, Alaska. I own the fishing vessel Loki, two permits, and have been an owner/operator in Bristol Bay for the last ten years. I also am part owner/operator in the F/V Odin and participate in SE seining, GOA blackcod/halibut, and Or/Wa dungeness in the winter. I am writing to express my opposition to proposals 44, and 61-68. I readily agree that we have a statewide problem of low King salmon abundance. Alaska also is the benchmark for fisheries management practices around the world. The current proposals aim to take the power away from fisheries biologists, like Tim Sands in the Nushagak,

and give it to a political body. This not only is a bad idea in itself but it reduces the management flexibility needed to effectively maximize both the economic value and the continued health of the greatest salmon run left in the world. It's a delicate balancing act managing booming sockeye runs while facing reduced king escapement in the same waters. One that is best left to a professional biologist not a political body.

PC231

Submitted by: Shiloh Seymour

Community of Residence: Homer Alaska

185 I oppose this proposal Kings are not a significant portion of the run and should not dictate the management of the much more prolific Sockeye.

45 I appose this proposal. Things have worked great for years I don't see any reason to change them.

57 I oppose this proposition. Many of the areas that we fish in the new Check have huge title fluctuations, often time leading to wide open water inside of the setnets. While i understand the issue with entanglement. Such a broad reaching regulation wouldn't be good for the whole of the district.

61 I oppose this proposition. Anything proposed by the Kenai sports fisherman Association should be thrown out they are not a vested party in Bristol Bay. They are a special interest group without traditional use.

62 oppose this proposition. Anything proposed by the Kenai sports fisherman Association should be thrown out they are not a vested party in Bristol Bay. They are a special interest group without traditional use. furthermore I lost my childhood fishing grounds to special interest groups like them I grew up fishing Cook inlet. I left to come to the bay because of organizations like theirs.

70 agree this seems like a good solution to give us fishing time in the Wood River while giving Kings the opportunity to go up the nushigak.

71 agree tired of letting the illegal fisherman get all the fish.

72 agree this would provide much better equal opportunity to fish legally.

73 agree again anything to get us off of the North line we're only a few lawbreakers reap the rewards with little to no consequence.

74 any one of the general district plans would work to make the fishing fair instead of letting a few individuals breaking the law get all the fish.

75 agree, this would be helpful in both gear reduction, and put permits into the hands of the most active fisherman.

76 agree I am in favor of permit stacking, reducing overall gear in the water, and giving a person the opportunity to have full control of there operations.

77 agree I really like the idea of the E permit being irrevocable. This would permanently reduce boats making each operation more profitable.

78 agree. I am in favor of permit stacking, reducing overall gear in the water, and giving a person the opportunity to have full control of there operations.

79 oppose. This is a land grab trying to keep drifters out of some of the most productive waters in Bristol Bay. The set nets already have the best spots locked down.

80 strongly oppose. This is being done in an effort to push drift fisherman out of traditional areas we have finished.

81 oppose. This violates traditional use, and is a foothold towards losing our fishery.

82 agree we need solid definition on the 32' rule.

83 agree this would be very helpful to have this more defined and easy to understand

84 oppose this would make all 32 foot vessels less valuable than newer vessels made, it would degrade our investment into 32 foot legal boats.

85 agree but this proposal needs refinement.

86 agree this needs a clearer definition for the shorter boats.

87 agree this is huge for our overall quality. It needs to be added to the list of exclusions to the 32 foot limit. Transom coolers are vital for any both of fishes in shallow water. The only other option is to turn your RSW off. We want to deliver cold high-quality fish.

88 agree this is a silly regulation, it only serves to give the troopers another opportunity to take money from Fisherman.

89 appose this proposal while intended to only address the anchor issue excludes Jet drives Fish dropout baskets transom coolers. And many other necessary safety items. I like the idea it just needs more refinement.

90 agree I had to cut my roller off my brand new boat even though I felt that I was legal because the troopers desided that the mount my roller was sitting on was not a part of the roller. This had a significant financial impact on me the very year after I built my brand new boat. And I had to cut up my brand new boat. Many other boats in the fleet have gone like this for years and it's never been an issue.

91 agree this would be super helpful to get nets out of Jet drives and not have my crew in danger. It's a critical safety device.

92 oppose late season fishing is historic, and many families depend on it. It is not a significant impact on the overall run, and generally by this time all the runs have received their escapements.

Madam Chair and Members of the Board,

My name is Maggie Shade, and I am a set-net permit holder / crew member / family member fishing on Ekuk Beach in the Nushagak District. I submit this comment as a member of the Ekuk Beach Fishermen's Association (EBFA) and as someone whose livelihood and family depend on a safe, fair, and sustainable Bristol Bay fishery.

Allow the Nushagak Chinook Management Plan to Complete a Full Life Cycle

I support allowing the Nushagak Chinook Management Plan to work without preemptive alterations. Chinook are long-lived fish with a life cycle of seven years, and meaningful evaluation of conservation outcomes requires time and consistency. This plan was developed through a multi-year, Board-convened stakeholder process and adopted unanimously in 2023. Re-setting management in the middle of the Chinook life cycle creates instability for fishing families and undermines the ability to evaluate whether the plan is working.

Support for Proposal 56: Predictable Spatial Boundaries

I support Proposal 56, which would make Ekuk's coordinate-based offshore set-net boundary permanent. Adopted by the Board in 2022, this boundary has been working successfully as a clear, predictable, and enforceable seaward limit. Making it permanent provides certainty for set-net placement, drift operations, and enforcement in a high-density fishing area.

Support for Proposal 57: Orderly and Safe Fishing

I support Proposal 57, which establishes the same boundary as a shoreward limit for drift gear and prohibits contact with set-net gear. This proposal reduces entanglement risk, gear loss, and unsafe nearshore interactions by clearly defining spatial limits and updating set-net gear definitions. As the drift fleet has grown significantly in size and horsepower, these clear, enforceable rules are essential to maintaining an orderly and safe fishery.

Support for Proposal 80: Joint-Venture Set-Net Operations

I support Proposal 80, which allows limited joint-venture set-net operations under defined conditions. Joint ventures help small, family-based sites adapt to short openings, rising costs, and safety challenges without increasing fishing footprint or promoting consolidation. This approach has worked successfully in Kodiak set-net fisheries for over four decades.

Economic and Community Impacts of Missed Allocation

In recent years, set-net fishermen in the Nushagak District have consistently fallen far short of the Board-adopted 26% set-net allocation. These shortfalls, in harvest share and time, have real consequences for fishing families, local processing, and watershed communities like Ekuk. When allocation exists on paper but is not achieved in practice year after year, the economic and social fabric of Bristol Bay communities is weakened.

Together, these requests are important steps toward equitable harvest share in practice, not just on paper. Allowing the Chinook Management Plan to complete at least a full life cycle before considering alterations to the plan encourages participation and trust in conservation management; Proposals 56 and 57 reduce conflict and safety risks that disproportionately impact onshore set-net fishermen; and Proposal 80 provides limited flexibility for small

operations to adapt to shortened and more complex fishing opportunities. These measures help ensure that set-net fishermen in the Nushagak District have a fairer opportunity to sustain our fishing families and watershed communities over the long term.

Thank you for your consideration and for your service to Alaska's fisheries and fishing communities.

Respectfully submitted,

Maggie Shade

Ekuk Beach, Nushagak District

PC233

Submitted by: Chad Solbakken

Community of Residence: Comano Island

Strongly oppose prop 44

PC234

Submitted by: Suzanne Springer

Community of Residence: prescott az

Proposal #102. the requested changes are minimal and will enhance out of state visitors fishing experience.

PC235

Submitted by: Leon Stafford

Community of Residence: Togiak

Would love to have no king retention, would also like prawns for sockeye 5 days earlier. Also moving king place up to the pungokepak

PC236

Submitted by: Brad Stapes

Community of Residence: Oregon

102

Boards Support note: this comment submission was received as comments in the full proposal book and the proposal text was removed to focus on the substantive comments.

Submitted by: Kelly Stier
Bellingham, WA

PROPOSAL 45

It is true that this district has a later run timing and for those who fish only in this district can be negatively affected by the influx of vessels who've already put a season in another district and come here with a free transfer. I'm neutral to slightly in favor.

PROPOSAL 46

Same as my response to proposal #45.

PROPOSAL 47

Same as my response to proposal #45.

PROPOSAL 48

The idea that drift and set openers are to be managed by a ration is a difficult ask for the managing biologist. I'm not in support of this.

PROPOSAL 49

Same response as proposal #48.

PROPOSAL 50

I agree with the intent of this poorly worded proposal.

PROPOSAL 51

This proposal makes sense. Having to drop gear off to a tender to fish a special harvest area is a complicated mess. Bagging it and holding it aboard is more reasonable. I support this proposal.

PROPOSAL 52

This proposal sets out to solve a problem I didn't know existed. I don't see a problem with giving the biologist more tools to maximize harvest when escapement is strong.

PROPOSAL 53

[redacted by boards support-personal attack]. I do not support this rambling proposal.

PROPOSAL 54

I support this proposal.

PROPOSAL 55

If I'm reading this correctly, it is the same intent as proposal #54.

PROPOSAL 56

With sealevel change, this proposal while trying to establish clarity may have unintended consequences, potentially allowing setnets to operation well away from shore. I think this needs to be further discussed before I can support this. Not in support.

PROPOSAL 57

I do not support this. This esstually makes a setnet exclusive area regardless of setnets being in the water or not. This area is a concentrator and setnetters are trying to make this a setnet only area. I do not support this proposal.

PROPOSAL 58

I'm not sure I understand this proposal's impact.

PROPOSAL 59

I'm neutral on this one. The wood river special harvest area is a tool that allows for additional harvest when the Nush is behind. It also allows for allocation adjustment. I don't mind letting setnetters to catch up using this tool.

PROPOSAL 60

Neutral on this one.

PROPOSAL 61

We need to develop an accurate way to count King Salmon first before we make any more regulation that rely on scanty information. I do not support this proposal.

PROPOSAL 62

We need to develop an accurate way to count King Salmon first before we make any more regulation that relies on scanty information. I do not support this proposal.

PROPOSAL 63

This is a step in the right direction. More accurate data is needed to properly manage kings in this system. I support this proposal.

PROPOSAL 64

I agree with the logic of this proposal.

PROPOSAL 65

1st, king salmon counting needs to more accurate. 2nd, Ekuk setnetters use trucks to drag their nets onto the beach. When the Wood river opens, Ekuk setnetters are not equipped to fish that area. I understand that this puts them at a disadvantage, but I don't think we should be catering to this group. I do not support this proposal.

PROPOSAL 67

Again, we need accurate counting first.

PROPOSAL 68

Accurate counting first.

PROPOSAL 69

Without accurate counting, we cannot make rules like this.

PROPOSAL 70

Neutral on this one.

PROPOSAL 71

I strongly support this. Late season once all rivers have met escapement goals there is no need for boundaries that confine fishermen to districts and incentives fishermen to fish illegally. There is no reason to continue to restrict fishermen to these small areas. It creates conflict and encourages illegal fishing. By adopting a general district like this also eliminates the need to enforce those boundaries. This is way past due.

PROPOSAL 72

This is another good approach to the general district as proposed in #72. I support a general district.

PROPOSAL 73

This proposal has good intent. I think the prior two proposal have better language and address the same issue.

PROPOSAL 74

I support this proposal.

PROPOSAL 75

Permit stacking has many benefits. I strongly support this.

PROPOSAL 76

I support this proposal.

PROPOSAL 77

I don't see this as necessary if permit stacking is allowed.

PROPOSAL 78

Long winded pitch for permit stacking.

PROPOSAL 79

No opinion on this gear type in this area.

PROPOSAL 80

This is a departure from the intent of owner-operator, essentially allowing a setnet permit owner to lease their permit to another and not be present. I do not support this proposal.

PROPOSAL 81

Beach seins? I'd like to know more.

PROPOSAL 82

The 32' limit restriction is antiquated and questionable in its original intent. I would like to see the length limit removed. While this has good intent, it's not addressing the root issue.

PROPOSAL 83

Why limit to 36'? Remove the limit all together.

PROPOSAL 84

Remove the limit.

PROPOSAL 85

Remove the limit.

PROPOSAL 86

Remove the limit.

 PROPOSAL 87

Remove the limit, not just the rule that affects your boat.

 PROPOSAL 88

Remove the limit, not just the rule that affects your boat.

 PROPOSAL 90

Remove the limit, not just the rule that affects your boat.

 PROPOSAL 91

Remove the limit, not just the rule that affects your boat.

 PROPOSAL 92

I've caught a lot of sockeye in the Naknek/Kvi district after July 25th. I don't support this proposal.

 PROPOSAL 93

I'm neutral on this.

 PROPOSAL 94

Neutral on this proposal.

 PROPOSAL 95

I'd rather see a non-registration required general district for free-week.

Submitted by: Robb Stilnovich

Community of Residence: Fircrest, WA

Dear Members of the Alaska Board of Fisheries,

My name is Robb Stilnovich, I am a drift gill net fisherman in Bristol Bay and I am submitting written testimony regarding the following proposals.

I oppose Proposals 44 and 61–68 to the extent that they would modify the Nushagak District King Salmon Stock of Concern Management Plan.

The SOC plan was developed through a multi-year, stakeholder-driven committee process involving commercial, subsistence, and sport users, Advisory Committees, and the Alaska Department of Fish and Game.

The plan has only been in place for three fishing seasons and was not expected to produce immediate biological recovery given the 4–7 year life cycle of Chinook salmon.

Available analyses indicate the plan is functioning as intended by delaying commercial openings, reducing fishing time during peak Chinook vulnerability, reducing exploitation of king salmon in the commercial fishery, and increasing escapement prior to harvest exposure.

I respectfully request the Board allow the plan to remain unchanged and be evaluated over a full Chinook generation.

Sincerely,

Robb Stilnovich

F/V Dalmacia

Submitted by: Erwin Stroosma

Community of Residence: Bristol Bay

Dear Members of the Alaska Board of Fisheries,

My name is Erwin Stroosma, I am a 35 year drift gill net fisherman in Bristol Bay. I married into a Bristol Bay watershed family and have been fortunate enough to run a family operation that has included my three kids, multiple nephews as well as numerous family friends.

I am concerned about potential changes that would amend a plan that has been developed by Bristol Bay stakeholders. As such, I oppose Proposals 44 and 61–68 to the extent that they would modify the Nushagak District King Salmon Stock of Concern Management Plan.

With appreciation,

Erwin Stroosma

f/v Emma Corina

Dear Members of the Alaska Board of Fisheries,

My name is Chad Studebaker. I am a Bristol Bay commercial fisherman and owner-operator with over a decade of experience fishing in the Bay. I submit the following comments on the Bristol Bay Finfish proposals based on my on-the-water experience and my concern for the long-term sustainability of the fishery as both a biological resource and a working industry.

Effective fisheries management must balance conservation goals with economic reality, enforceability, and cumulative impacts. Regulations that steadily reduce commercial viability do not strengthen conservation outcomes; they weaken the very sector that provides accountability, monitoring, and long-term stewardship of the resource.

****Proposal 44 – Subsistence Chinook Limits and Reporting****

****Position: Oppose****

I oppose Proposal 44. Subsistence fisheries should not be targeted with new limits or reporting requirements without clear evidence that such measures will materially improve Chinook escapement. In the absence of an established Amount Necessary for Subsistence (ANS) for Chinook in the Nushagak, this proposal risks creating social conflict while failing to address the primary factors affecting stock productivity.

****Proposals 61–68 – Expanded Chinook Stock of Concern Restrictions****

****Position: Oppose****

I oppose Proposals 61 through 68. The commercial fleet, particularly the drift fleet, has already experienced significant conservation-related restrictions under the existing Stock of Concern framework, including delayed openings, reduced fishing time, and inseason closures. These measures have had substantial economic impacts, yet Chinook escapement challenges have persisted even in years with limited or no commercial harvest.

Further automatic or extended restrictions risk compounding economic harm without demonstrating additional conservation benefit, while reducing management flexibility needed to respond to tides, weather, and actual run behavior.

****Proposal 64 – Allocation Changes During SOC Conditions****

****Position: Oppose****

I oppose Proposal 64. Conservation designations should not be used to alter allocation among user groups. Allocation changes made under Stock of Concern conditions risk becoming long-term precedent unrelated to biological effectiveness and undermine established access frameworks.

****Permit Stacking Proposals (75–78)****

****Position: Support****

I support permit stacking within a gear group. Permit stacking improves safety, efficiency, and economic viability without inherently increasing fishing power or conservation risk. Given existing time and area constraints, stacking allows permits to remain active and helps maintain a stable, enforceable commercial fleet.

****Vessel Specification and Length Proposals (83–85)****

****Position: Support****

I support reasonable updates to vessel specifications, including vessel length. Modern vessels improve safety, efficiency, and product quality. Restricting vessel modernization does not protect fish, but it does increase operating costs and erode the long-term viability of the commercial fleet.

**Cumulative Impacts and Long-Term Considerations**

The commercial fleet provides the majority of enforceable harvest data, economic value, and management accountability in Bristol Bay. Continued concentration of restrictions on this sector reduces fishing area, compresses time, increases congestion and fuel costs, and undermines economic sustainability.

If commercial viability declines, pressure does not disappear; it shifts toward less regulated sectors, weaker enforcement environments, and reduced political capacity to defend Bristol Bay as a public resource. Long-term conservation success depends on maintaining a fishery that is biologically sustainable, economically valuable, and politically resilient.

**Closing**

I respectfully ask the Board to evaluate these proposals cumulatively and to avoid further regulatory changes that undermine commercial viability without clear, measurable conservation benefit. Protecting the fishery requires protecting both the fish and the people who depend on them.

Thank you for the opportunity to comment.

Respectfully,

****Chad Studebaker****

Bristol Bay Commercial Fisherman

Owner-Operator

PC241

Submitted by: Joseph Sukalski

Community of Residence: Naknek

I am a Bristol Bay commercial fisherman writing to oppose Proposals 44 and 61–68.

The Nushagak District King Salmon Stock of Concern Management Plan was adopted in March 2023 and has not been in place long enough to evaluate its effectiveness over a full Chinook generation. Restructuring the plan now is premature and unnecessary.

These proposals would reduce management flexibility and create significant risk to the commercial sockeye fishery, with the potential loss of millions of fish and serious economic harm to fishermen, processors, and local communities. Existing tools already allow managers to conserve Chinook salmon while responding to real-time run information.

I respectfully urge the Board of Fisheries to reject Proposals 44 and 61–68 and leave the current management plan unchanged until it can be properly evaluated.

Submitted by: Reba Temple

Community of Residence: Petersburg, Alaska

I oppose Proposal 61, 62, and 69. The Bristol Bay salmon fishery is only viable for commercial fishermen if they are able to fish in all four districts. If the Nushagak has additional king regulations imposed, fishermen will be forced to crowd into the other three districts. This could cause extra pressure on the salmon stocks in those rivers, as well as a decrease in catch per vessel. It would make it harder for fishermen to make money in the fishery. Instead, it seems worthwhile to focus on better king counting technology so that Fish and Game is more able to differentiate between sockeye and king salmon as they go up the river.

I support Proposal 75 and 76. If a husband and wife are each permit holders who fish Bristol Bay, it becomes very hard for them both to continue in the fishery once they have kids. By allowing permit stacking under one individual's name, both of their permits can stay in the family and continue fishing.

I support Proposal 95. My first years running a boat thankfully fell during the years when there was a "free week." This time period in the season was invaluable for me as I got to practice setting my net and helped me learn my boat. However, I do appreciate how it was a regulatory nightmare for Fish and Game as boats were able to buzz between districts. Proposal 95 seems like a very creative solution to this problem. It allows for early season "practice fishing" to help the captain and crew, while also maintaining district registration.

COMMENT ON PROPOSAL #81**Alaska Board of Fisheries – Bristol Bay Finfish Meeting
January 2026**

To the Alaska Board of Fisheries,

In addition to submitting this comment in support of **Proposal #81**, I respectfully encourage the Board to explicitly authorize and support greater flexibility for the **ADF&G Commissioner to implement experimental and pilot harvest programs**, similar to the 2024 Kenai beach seine tests conducted under commissioner-approved special provisions.

Those Kenai experiments provided the industry and managers with rare, real-world insight into alternative harvest methods that would not have been available through theory or modeling alone. As an industry, we are facing rapidly changing environmental, biological, and market conditions. Relying exclusively on what “we have always done” is no longer sufficient to ensure long-term viability. Carefully designed, tightly monitored experimental fisheries are one of the few responsible tools available to explore better outcomes before constraints force reactive and potentially more disruptive management decisions.

My family and my wife’s family have participated continuously in the Bristol Bay commercial salmon fishery since 1948. Our primary household income is derived from this fishery, and our perspective is informed not only by multigenerational participation, but by direct involvement in harvesting, marketing, and selling Bristol Bay sockeye into the modern U.S. seafood market.

I am submitting this comment in support of **Proposal #81**, and more broadly to encourage the Board to seriously consider the role of **non-entanglement harvest methods** as a management tool for the long-term viability of the Bristol Bay fishery.

The Bristol Bay Harvest Model Lacks Competitive Advantages

The current Bristol Bay harvesting model is increasingly misaligned with contemporary market realities. While Bristol Bay remains biologically productive, the harvest system itself produces artificially degraded quality, high operational and management costs, unnecessary safety risks, and limited flexibility in addressing mixed-stock conservation concerns.

Over the last three decades, the seafood marketplace has changed dramatically. Farmed salmon now dominates retail space and consumer mindshare, Russian fisheries are increasingly utilizing non-entangling harvest methods with near-total utilization, and buyers and consumers place growing emphasis on freshness, consistency, and sustainability narratives that extend beyond volume alone.

At the same time, ex-vessel price volatility has introduced real economic instability for permit holders, processors, and local communities. The existing model increasingly treats fishermen as a price buffer rather than as value creators, despite exclusive access to the resource.

Why Incremental Quality Improvements Are No Longer Enough

For more than twenty years, fishermen, processors, and communities in Bristol Bay have invested heavily in quality improvements: bleeding protocols, chilling and floating practices, brailer bag limits, infrastructure upgrades, ice availability, and post-harvest product innovation.

Despite these efforts, when adjusted for inflation, the 2023 base price for Bristol Bay sockeye was the lowest ever paid. The largest gains achievable within a gillnet-only harvest framework have already been realized. Further improvements from this point forward are increasingly costly and yield diminishing returns at retail.

If Bristol Bay wild salmon is to meaningfully differentiate itself from farmed alternatives in the American consumer market, **structural change**, not incremental optimization, is required.

A Path Forward: Non-Entanglement Harvest Methods

Proposal #81 represents an opportunity to evaluate alternative, non-entanglement harvest methods operated by existing limited-entry permit holders. Examples include beach seines, fyke nets, fisherman owned fish wheels, and shore-based lead systems with live-holding capability.

These methods are not proposed as replacements for the existing fishery, nor as mandates. Rather, they should be viewed as **research tools and optional harvest strategies** that can:

- Preserve near-perfect fish quality
- Reduce incidental mortality of non-target salmon species
- Lower ecological footprint per harvested pound
- Improve safety and operational efficiency
- Enable meaningful market differentiation and price negotiation

Informal discussions with multiple major Bristol Bay buyers indicate strong interest in salmon harvested by non-entanglement methods, with anticipated premiums in the range of **30-40% per pound or more** relative to conventionally harvested fish.

Fishermen have innovated as much as possible with the current harvest methods, and we need new avenues to innovate further. The goal is not to increase individual permit holder volume, but to **maximize value** from the volumes we each already harvest. If a permit holder could elect to choose from several harvest methods and commit to them for a given year, it would provide options for innovation.

Empirical Evidence: 2024 Kenai Beach Seine Research

In 2024, commercial fishermen in Upper Cook Inlet operated experimental **set beach seine gear** under commissioner-approved special provisions in response to conservation constraints associated with Kenai River Chinook salmon.

Accurate operational records were maintained. While the fishery was challenging, the results demonstrated that:

- Beach seines could successfully harvest sockeye salmon at commercial scale

- Non-target salmon species encountered during operations could be released alive and unharmed
- The gear could be deployed using existing shore-based infrastructure with limited capital investment
- The harvested product exhibited markedly superior quality compared to gillnet-caught fish from the same region

These results are directly relevant to Bristol Bay. They demonstrate that selective, non-entanglement harvest methods are not theoretical constructs, but practical tools capable of operating under real-world conditions while advancing both conservation and economic objectives.

Additional applied research over the past seven years on the Columbia River further demonstrates the feasibility and value of selective, non-entanglement harvest methods. That work has focused on harvesting hatchery-origin salmon while allowing for the live release of wild stocks through the use of stationary, live-capture infrastructure designed for continuous sorting and handling.

This research program has progressed beyond proof-of-concept and into sustained operational testing, including commercial sale of harvested fish. Several Bristol Bay fishermen have participated directly in these efforts, contributing to both the operation of the gear and the downstream handling and marketing of the harvest. Feedback from buyers of this non-entanglement-harvested product has been consistent: fish quality is markedly superior to salmon traditionally harvested with gillnets in the same region, with improvements in freshness, condition, and overall market acceptance.

Together with the 2024 Kenai beach seine experiments, this body of work demonstrates that selective harvest methods are not theoretical or experimental curiosities, but practical tools capable of operating at scale, producing high-quality product, and advancing both conservation and economic objectives.

Why This Matters Now

Bristol Bay faces increasing risk from environmental variability, shifting ocean conditions, and the growing likelihood that conservation constraints for stocks of concern will further restrict traditional harvest opportunities. Other Alaska fisheries—including Cook Inlet and Kodiak—have already experienced significant economic and operational impacts under similar pressures.

Addressing these risks proactively through research and limited pilot programs is far preferable to reacting later under crisis conditions. Non-entanglement harvest methods offer a credible means of improving quality, reducing mixed-stock risk, and restoring greater economic agency to fishermen.

Putting better tools in the hands of independent permit holders does not weaken Bristol Bay's heritage—it strengthens its future. The next generation of fishermen deserves a fishery that is competitive, resilient, and capable of thriving in the modern marketplace.

For these reasons, I urge the Board to support **Proposal #81** and to encourage continued, data-driven experimentation and innovation under commissioner authority in Bristol Bay and other Alaskan fisheries.

Respectfully submitted,

Reid and Eike Ten Kley, lifetime Bristol Bay fishermen and permit holders.

2026 Bristol Bay Finfish
Written Testimony

Rick Tennyson

[REDACTED]

Dillingham, AK 99576

[REDACTED]

[REDACTED]

I have commercial drift fish Bristol Bay since 1974, before limited entry. My four children also fish Bristol Bay. Thank you for reading my testimony and serving on the Board of Fish.

Proposal 44:

I oppose this proposal. King Salmon are a very important subsistence food for water shed residences. Sport fishers should not be allowed to fish until escapement of king salmon has reach 55,000.

Proposals 45-53:

No comment

Proposal 54 & 55:

I'm confused, ADFG wants to stop managing for silvers, but is holding fisher's feet to the fire for king salmon management in the Nushagak River. All Bristol Bay Rivers king salmon escapement numbers are struggling, but no king salmon management plan for the other rivers, only the Nushagak River. Why?

Proposal 56 & 57:

I oppose these proposals: there needs to be GPS coordinates describing such a line. There are times when set nets are not fishing, processor stop buying, weather prohibits set net fishing, set net operator has moved operation into Wood River to fish. When this happens drift nets should be allowed to fish inside this line.

Proposal 58:

I do not understand this proposal enough to support or oppose it.

Proposal 59:

I support this proposal. It's a fare solution for both gear types.

Proposal 60:

I oppose this proposal. Set nets at 25 fathoms allows for set nets further up stream to share in the wealth. The Wood River is not a very wide river and 37 fathom net would be very effective for the front-line sites and not letting other sites to catch fish.

Proposal 61, 62 & 66:

I oppose these proposals. I support not letting sport fishers to fish until 55,000 king salmon escapement has been reach and 95,000 escapement goal is forecasted to be met.

Proposal 63:

I support this proposal: With the King Salmon Management plan in affect. The sport fishing has been fantastic on the Nushagak River, according to social media posts by the lodges and clients. Sport fisher also needs to share in the conservation of king salmon. I support not letting sport fishers to fish until 55,000 king salmon escapement has been reach and 95,000 escapement goal is forecasted to be met.

Proposal 64:

I support this proposal. This proposal would give management a tool to help reduce over escapement. Especially when big pushes of fish enter the river.

Proposal 65:

I oppose this proposal. Bristol Bay has a set net allocation plan that was based on historic catch when the bay was full of set netters, and we fished a minimum of 12-hour openings. Today there are much less active set net sites thus less catching capacity, and we fish shorter fishing periods, generally 6 hours. But yet the set net allocation has remained the same, fish migrations has also change from beach migration to channel migration, depending on season. Take these three changes, less set net sites, fish migration change, shorter fishing periods and some fishing districts set netters are allowed to fish continuously and never come close to their allocation percentage. This has turned some set net operations from marginal operations to gold mines.

Proposal 67:

I support this proposal.

Proposal 68 & 69:

I oppose these proposals. With the Nushagak sonar under counting salmon migration, it is difficult to know what truly is escaping. If the error of under counting the salmon on Nushagak River was adjusted for the error in counting, the king salmon escapement mathematically

would have met its escapement goal for 2023 & 2024 season. We first need to get accurate escapement counts before we start changing the regulations.

Proposal 70:

I oppose this proposal.

Proposal 71,72,73 & 74:

I oppose these proposals. The open district concept may help the drifters but the set net fleet will be negatively affected.

Proposal 75, 76, 77 & 78:

I oppose these proposals. Bristol Bay is already seeing segregation between nonlocal fishers, the haves, and local fishers, the have nots. Nonlocal fishers have other sorts of income which allows them to purchase multiple permits, large jet boats. Where the local fishers have one source of income, fishing. This single source of income needs to sustain life needs. The water shed fishers are a dying breed.

Proposal 79 & 80:

No comment.

Proposal 81:

I oppose this proposal.

Proposal 82:

I support this proposal. With the following changes: b2) fish drop out catcher needs to have a length it can extend past the transom. Currently some extend 18 inches and some 5 feet. 2c) gillnet roller shall not extend beyond the transom. 8) water jets, I've seen different instillation methods, jet unit is recessed into transom, flush with transom and transom boxed out beyond transom resulting in water jet sticking out 3-4 feet beyond transom with fish catcher above. Huge advantage, allows for larger fish holds.

Proposal 83-86, 88-96:

I oppose these proposals.

Proposal 87:

I support this proposal.

Proposal 97-105

No comment.

Submitted by: Benjamin Thomas

Community of Residence: Commercial Fisherman from Portland Oregon

Support Proposal 45 - Extend the registration/reregistration deadline in the Naknek-Kvichak District from July 17 to July 22.

Comment:

I support extending the registration dates because the fish have been showing up later every summer. I feel like this adjustment allows for better escapement and seems more fair for different gear types. As a set netter this is important to me.

Support Proposal 46 - Amend the Sockeye Salmon Fisheries Management & Allocation Plan in the Naknek-Kvichak District to align allocation dates with the extended season.

Comment:

I support adjusting the management dates to match the returns that have been coming later over the past several years and will probably continue that way. It helps us meet our escapement goals and allows me to plan accordingly as I prepare and fish during the season.

Submitted by: Wes Tibbetts

Community of Residence: Anchorage

I have fished in Bristol Bay for over 40 years. Proposal 80 would support me and my family to continue to fish productively and legally.

Submitted by: Harrison Tiffany

Community of Residence: Minnesota

Dear Members of the Alaska Board of Fisheries,

My name is Harrison , I am a drift gill net fisherman captain in Bristol Bay and I am submitting written testimony regarding the following proposals.

I oppose Proposals 44 and 61–68 to the extent that they would modify the Nushagak District King Salmon Stock of Concern Management Plan.

The SOC plan was developed through a multi-year, stakeholder-driven committee process involving commercial, subsistence, and sport users, Advisory Committees, and the Alaska Department of Fish and Game.

The plan has only been in place for three fishing seasons and was not expected to produce immediate biological recovery given the 4–7 year life cycle of Chinook salmon.

Available analyses indicate the plan is functioning as intended by delaying commercial openings, reducing fishing time during peak Chinook vulnerability, reducing exploitation of king salmon in the commercial fishery, and increasing escapement prior to harvest exposure.

I respectfully request the Board allow the plan to remain unchanged and be evaluated over a full Chinook generation.

Sincerely,

Harrison Tiffany

F/V Crawdad

Proposal 96 – Support with Amendment

We support reducing the number of hooks allowed on the Naknek River. Given the massive volume of salmon Bristol Bay supports, there is no justification for treble-hook rigs. Treble hooks significantly increase mortality on released fish.

We do **not** support a blanket bait ban. Bait can be fished responsibly with very low mortality. On the Togiak River we have successfully used the following rule for years:

“Bait is allowed only when tipped on a jig/fly or artificial lure.”

This prevents deep hooking while still allowing effective fishing. A single bare hook with bait dramatically increases the chance of a fish swallowing it.

Proposal 97 - Oppose

Proposal 98 – Support with Amendments

We support reducing the king salmon bag limit on the Naknek River.

Given the ongoing statewide decline in king salmon returns — and the well-documented drops in every Bristol Bay drainage — it is surprising the Naknek has not already seen a reduction. The current limit is simply no longer sustainable.

We ask the Board to amend Proposal 98 as follows: **Bag limit of three king salmon, none of which may exceed 28 inches.**

A 28-inch maximum protects nearly all spawning females while still allowing harvest of smaller males and jacks. This size-based approach has proven effective in other systems and would provide meaningful conservation benefits without eliminating opportunity.

Proposal 99 – don’t know enough about the fishery to make a comment

Proposal 100 - don’t know enough about the fishery to make a comment

Proposal 101 – Oppose

We do not support an all-out bait ban. I think that it is time that sport fisherman and Outfitters to acknowledge that cured salmon eggs are the issue when it comes to using bait. Cured salmon eggs on a single bait hook are the primary cause of most hook up mortalities. It is time for

Selective bait fisheries to be implemented, so that those who want to fish bait responsibly can but are not punished by an all-out ban. Cured salmon eggs are the problem. So, while I don't support this proposal because I don't think all out bans are effective or fair, I do think the Author should propose a selective bait fishery and ban the use of cured salmon eggs.

Proposal 102 – Support

We are the authors of Proposal 102 and fully support it in its entirety.

Opening the bait fishery five days earlier would provide additional opportunity to harvest Sockeye and Chum salmon while maintaining low pressure on King salmon, which remain catch-and-release only in the Togiak River. We have no intention of ever requesting that the Board consider allowing harvest of Kings again. We greatly value our catch-and-release fishery for them; however, we believe there is clear room to continue expanding the Togiak Sockeye fishery given their abundant numbers.

As the primary user group on the Togiak in July, we do not target Kings with bait. We fish exclusively for Sockeye and Chum using salted prawns tipped on marabou jigs.

Regarding the proposal to move the King salmon boundary from the Gechiak River to the Pungokepuk River:

For those unfamiliar with the Togiak, the distance between the mouths of the Gechiak and Pungokepuk Rivers is approximately 5–7 miles. At the 2022 Bristol Bay Board of Fisheries meeting, a boundary was established at the Gechiak based on claims that the majority of Togiak Kings spawn in that stretch. However, several issues have arisen with this boundary.

First, enforcement is challenging. Fishing remains allowed above the Gechiak River, but anglers may not specifically target King salmon. This creates ambiguity: if an angler fishing legally above the Gechiak for Rainbow trout or Chum salmon incidentally catches a King, have they violated the regulation? The rule is open to interpretation and inconsistent enforcement.

Additionally, the mouth of the Pongopuk River already serves as the practical boundary for outfitters and is the universal stopping and pickup point for all user groups on the river, coinciding with the start of the Togiak National Wildlife Refuge.

Our anecdotal experience indicates that significantly more Kings now spawn above the Pungokepuk than between the Gechiak and Pungokepuk. This aligns with the 2012 U.S. Fish and Wildlife Service study, which found:

- Only 2% of spawning occurred in Gechiak Creek.
- No significant spawning activity was documented between the Gechiak and Pungokepuk Rivers—contrary to claims made at the 2022 BOF meeting.

- The majority of tributary spawners were located well above the Pungokepuk River, primarily in the Naylorun, Kemuk, and Ongivinuk Rivers (more than 20 miles upstream).
- Tributary-bound Chinook entered the river earlier than mainstem spawners.

We believe these factors support moving the boundary to the Pungokepuk River for clearer enforcement, better resource protection, and consistency with existing river use patterns.

Thank you for your consideration.

Proposal 103 - Oppose

With regard to proposal 103, which is no chumming submitted by royal coachman, their proposal if passed would not accomplish their stated end goal of establishing/maintaining fair chase practices because; The same salmon eggs that are likely being used as chum, can easily be used as bait on a single hook, providing the same level of attraction when the eggs fall off of the hook. As it is currently worded, their proposal would still allow for the use of bait in targeting these species, would not constrain the types or volumes of bait being used, and would provide increased difficulty for enforcement officers who would have to determine whether or not bait falling off of the hook or lure, was then being utilized as chum. The problem appears to be the liberal use of cured salmon roe as an attractant, and not the use of other forms of chum. Without a total bait ban, or a specific ban on salmon roe as bait or chum, this proposal if passed will likely not accomplish their stated goals of those who submitted it

Proposal 104 - don't know enough about the fishery to make a comment

Proposal 105 - don't know enough about the fishery to make a comment

December 28, 2025

Board of Fish
State of Alaska

Madam Chair and Members of the Board,

My name is Clara Torrison. For many years I have been a setnet permit holder on Ekuk Beach in the Nushagak District. I continue to fish the beach and currently crew for our family operation. I am Alaska Native, as are my family and ancestors. We have fished this beach long before the state of Alaska, from the same fish camp. As with many families on this beach, it is far more than a commercial fishery. It is our heritage and connection to the land, waters and abundant resources of Bristol Bay. We want to provide our input on some of the many important topics that you will decide upon, each with its implications to our family.

I submit these comments both as a member of the Ekuk Beach Fishermen's Association (EBFA) and as someone whose livelihood and family depend on a safe, fair, and sustainable Bristol Bay fishery.

- Maintain the Nushagak Chinook Management Plan. I support allowing the Nushagak Chinook Management Plan to work without pre-emptive alterations. Chinook are long-lived fish with a life cycle of seven years, and meaningful evaluation of conservation outcomes requires time and consistency. This plan was developed through a multi-year, Board-convened stakeholder process and adopted unanimously in 2023. Re-setting management mid-cycle creates instability for fishing families and undermines the ability to evaluate whether the plan is working. This is a good plan that was developed with a good, public process – we need to give it time to work.
- Support for Proposal 56: Predictable Spatial Boundaries. I support Proposal 56, which would make Ekuk's coordinate-based offshore set-net boundary permanent. This boundary was approved by the Board in 2022 and provides a clear and enforceable line between set and drift operations. It has helped a great deal already to decrease conflict and helped with gear entanglements. Making it permanent provides certainty for setnet placement, drift operations, and enforcement in a high-density fishing area. Not making this permanent would be to reintroduce chaos and all the trouble that would bring.
- Support for Proposal 57: Orderly and Safe Fishing. I support Proposal 57, which establishes that same boundary as a shoreward limit for drift gear and prohibits contact with set-net gear. This is a much-needed enhancement to Proposal 56, which provides limited protection of vulnerable setnet gear. Our family and everyone else on the beach has suffered significant outer gear damage/loss due to entanglements with drift boats. We even have a term we use when we are approaching our site and see our net (often full of fish) washed up on the shore – “soul crushing”. We need a minus 3.0 tide to change out our rope, which is uncommon during the short commercial season. We can literally be taken out by a careless or aggressive drift boat. This proposal reduces entanglement risk, gear loss, and unsafe nearshore interactions by clearly defining

spatial limits and updating set-net gear definitions. As the drift fleet has grown significantly in size and horsepower, these clear, enforceable rules are essential to maintaining an orderly and safe fishery.

- Support for Proposal 80: Joint-Venture Setnet Operations. I support Proposal 80, which allows limited joint-venture setnet operations under defined conditions. Joint ventures help small, family-based sites adapt to short openings, rising costs, and safety challenges without increasing fishing footprint or promoting consolidation. There are Native families that are struggling and even exiting the fishery because of the high cost of equipment and crew issues; allowing joint ventures would help these families to share resources. This approach has worked successfully in Kodiak setnet fisheries for decades.
- Economic and Community Impacts of Missed Allocation. In recent years, setnet fishermen in the Nushagak District have consistently fallen far short of the Board-adopted 26% setnet allocation. These shortfalls have real consequences for fishing families, local processing, and watershed communities like Ekuk. When allocation exists on paper but is not achieved in practice year after year, the economic and social fabric of Bristol Bay communities is weakened. For Ekuk beach specifically, we fish with trucks and deliver (in ice slush) to the Alaska Best Seafood plant. We completely depend on this plant. Falling short of the allocation, which impacts every family, is tremendously impactful to the processing plant that needs volume to survive. We all need the allocation to work as the Board intended.

Together, these requests are important steps toward equitable harvest share in practice, not just on paper. Allowing the Chinook Management Plan to complete at least a full life cycle before considering alterations to the Chinook conservation plan encourages participation and trust in conservation management; Proposals 56 and 57 reduce interception, conflict, and safety risks that disproportionately impact onshore set-net fishermen; and Proposal 80 provides limited flexibility for small operations to adapt to shortened and more complex fishing opportunities. Taken as a whole, these measures help ensure that set-net fishermen in the Nushagak District have a fair opportunity to sustain our fishing families and watershed communities over the long term.

Thank you for your consideration and for your service to Alaska's fisheries and fishing communities.

Respectfully,

Clara Torrison

Clara Torrison

Chugiak, AK 99567

Ekuk Beach, Nushagak District

December 28, 2025

Board of Fish
State of Alaska

Madam Chair and Members of the Board,

My name is Luke Torrison. I am a setnet permit holder and fish on Ekuk Beach in the Nushagak District. My mom's (Alaska Native) family has fished this beach long before the state of Alaska, from the same fish camp. As with many families on this beach, it is far more than a commercial fishery. It is our heritage and connection to the land, waters and abundant resources of Bristol Bay. We want to provide our input on some of the many important topics that you will decide upon, each with its implications to our family.

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Thank you for your consideration and for your service to Alaska's fisheries and fishing communities.

Respectfully,



Luke Torrison

Chugiak, AK 99567

Ekuk Beach, Nushagak District

December 28, 2025

Board of Fish
State of Alaska

Madam Chair and Members of the Board,

My name is Scott Torrison. I am a setnet permit holder and fish on Ekuk Beach in the Nushagak District. My wife's (Alaska Native) family has fished this beach long before the state of Alaska, from the same fish camp. As with many families on this beach, it is far more than a commercial fishery. It is our heritage and connection to the land, waters and abundant resources of Bristol Bay. We want to provide our input on some of the many important topics that you will decide upon, each with its implications to our family.

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Thank you for your consideration and for your service to Alaska's fisheries and fishing communities.

Respectfully,



Scott Torrison

Chugiak, AK 99567

Ekuk Beach, Nushagak District



UNITED FISHERMEN OF ALASKA

Mailing Address: P.O. Box 20229, Juneau AK 99802-0229

Phone: (907) 586-2820

E-mail: ufa@ufa-fish.org **Website:** www.ufa-fish.org

December 29th, 2025

Alaska Board of Fisheries
Board Support Section
ATTN: BOF Comments
PO Box 115526
Juneau, AK 99811-5526

RE: Opposition to Proposals 61, 62, 69, 92, Support for Proposal 80, and General Comments on Proposal 54.

Dear Chairwoman Carlson-Van Dort,

United Fishermen of Alaska (UFA) is a commercial fisheries trade association representing 37 commercial fishing organizations and independent fishermen who participate in the state and federal fisheries off Alaska. UFA appreciates the opportunity to provide comments on proposals for consideration at the upcoming January 13th-18th Bristol Bay Finfish meeting.

Proposals 61 and 62:

UFA Opposes proposals 61 and 62. Proposals 61 and 62 would create significant shifts to the current Nushagak King Salmon Management Plan by removing season start triggers that allow for commercial sockeye harvest before the 28th of June under status quo conditions. Neither proposal takes an approach of adjusting triggers or OEG's, two tools that could be adjusted and still allow in season management to remain flexible and dynamic with shifting returns and escapement data.

The current management plan was developed by a Board-sanctioned collaborative working group during the 2022/23 Board of Fisheries cycle. That working group was able to create a management framework that relies on OEGs and escapement triggers to open and close commercial harvest in the Nushagak District. This management plan has only been used for three seasons, not enough to indicate the full effectiveness as king salmon live on a 4-7 year cycle. This means we will likely not know true effectiveness of the management plan until the next Bristol Bay Finfish cycle in 2029/30. While we do not know the full cycle effectiveness of the plan, the Department has been able to achieve an additional escapement of 6,800-10,500 chinook up the Nushagak in the last three seasons while that plan has been in effect.

Maintaining the current Nushagak King Salmon Management Plan is the best option for the current situation as it has OEGs and escapement triggers in effect that can be modified without needing to

develop a new management plan. Making fine tuning adjustments such as adjusting OEGs or escapement triggers to open the fishery are much more responsive to the year-to-year shifts in fishery returns for both chinook and sockeye.

Proposal 69:

UFA Opposes proposal 69 as written. We are very supportive of meaningful management structures to rebuild the Nushagak kings, however, proposal 69 omits flexibility that was originally included in the draft rebuilding plan that was developed in the 2022/23 cycle. Following the recovery plan language that was provided in prop 69 for management provisions based on escapement, there was also language drafted but not adopted in 2023 that would allow for more responsive flexibility to be used by the department based on escapement indices. UFA is supportive of the additional language from 2023 as follows:

- “2. Restrictions - Management restrictions may be relaxed based on king salmon run timing and if catch and harvest data indicate restrictions are no longer needed to ensure the escapement goal is met.
- 3. Restrictions - If two consecutive years of escapement are near or above the upper bound of the escapement goal range, management restrictions may be relaxed or set aside using EO authority¹.”

Both of these additional sections allow for more departmental flexibility and the use of more dynamic management tools than is commonly used in rebuilding plans. We believe this is essential due to the unique nature of managing chinook recovery and a commercial harvest of sockeye in the Nushagak River.

Proposal 80:

UFA Supports proposal 80. Proposal 80 provides for limited joint-venture set-net operations of two permits, which would allow two permit holders to share equipment and comingle their catch. Joint ventures help small, family-based sites adapt to short openings, rising costs, shrinking crews, and safety challenges without increasing fishing footprint or promoting consolidation. This approach has worked successfully in Kodiak set-net fisheries for over four decades.

The proposer has had productive and positive conversations with ADF&G. The Department is willing to clarify their delivery regulations to account for joint deliveries by either member of the joint venture.

Proposal 92:

UFA Opposes proposal 92. Proposal 92 would limit the Department’s ability to manage the commercial fisheries in the Naknek-Kvichak district for late season fishing. The Department currently has EO authority to close the Naknek-Kvichak district if there are indicators of poor escapement. The Naknek-Kvichak District transitions to the fall fishing schedule on August 1st annually to accommodate more late season escapement windows.

Proposal 54:

UFA is neutral on Proposal 54 but wants to emphasize that this proposal is not intended to restrict or reduce commercial opportunity for fishermen in the Nushagak District through its implementation. The

¹ ADF&G, Staff comments on commercial, personal use, sport and subsistence regulatory proposals; committee of the whole groups 1-4 for Bristol Bay Finfish (2025)



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Department has indicated that harvest data is an adequate tool to responsibly manage species that are data poor and does not expect the adoption of this proposal to limit commercial opportunity in the late season for coho or sockeye salmon in the Nushagak District.

Thank you for your time and attention to these important Bristol Bay finfish issues, and please feel free to reach out if you have questions or would like to follow up on specific proposals.

Regards,

Matt Alward
President

Tracy Welch
Executive Director

MEMBER ORGANIZATIONS

Alaska Bering Sea Crabbers • Alaska Longline Fishermen's Association • Alaska Scallop Association • Alaska Whitefish Trawlers Association
Area M Seiners Association • At-sea Processors Association • Bristol Bay Regional Seafood Development Association • Bristol Bay Reserve
Cape Barnabas, Inc. • Concerned Area "M" Fishermen • Cook Inlet Aquaculture Association • Cordova District Fishermen United
Douglas Island Pink and Chum • Freezer Longline Coalition • Fishing Vessel Owners Assn Groundfish Forum • Kodiak Regional Aquaculture Association •
Kodiak Seiners Association • North Pacific Fisheries Association • Northern Southeast Regional Aquaculture Association
Northwest Setnetters Association • Petersburg Vessel Owners Association • Prince William Sound Aquaculture Corporation • Purse Seine Vessel Owner
Association • Seafood Producers Cooperative • Southeast Alaska Herring Conservation Alliance • Southeast Alaska Fisherman's Alliance • Southeast Alaska
Regional Dive Fisheries Association • Southeast Alaska Seiners • Southern Southeast Regional Aquaculture Association
United Catcher Boats • United Southeast Alaska Gillnetters • Valdez Fisheries Development Association

Submitted by: David Vardy

Community of Residence: Stanwood, Washington

Proposal 72 is listed as a "Purse seine operation (1 proposal)" It is actually a gill net operation proposal.

I urge the BOF to thoughtfully consider all of the Fishing District Proposals (70-74) and to reach out to their authors to gather the full picture in order to fully understand the reasoning behind these proposed changes.

I Strongly support Proposals 75, 76 & 77. The groundwork has been laid out for this type of proposal for many years and this would not be the first fishery in Alaska that has implemented permit stacking. Proposal 76 appears to be the best written candidate based on proposal language.

I Strongly support Proposals 82, 83 for the purposes of vessel safety and efficiency.

I Strongly support Proposals 87, 88 & 90 for the purposes of vessel safety and efficiency.

I Strongly support Proposal 95 for the purposes of safety and early season equipment testing without having to fully commit a vessel and its operations to a district. This particular proposal could lead to less maritime incidents, injuries and even fatalities.

Submitted by: Kodi Vetsch

Community of Residence: anchorage

Madam chairmen and members of the board,

My name is Kodi Vetsch, and I am a set-net permit holder fishing on the north beach In the Egegik district. I submit this comment on behalf of my family's small fishing operation consisting of three limited entry permits.

I support proposal 80 which provides limited flexibility for small operations like mine and many others to operate more efficiently in a fishery that presents many challenges. A Joint-venture structure can be extremely beneficial in expediting our product to market while improving salmon quality as well as safety.

Thank you for your consideration,

Kodi Vetsch

North beach, Egegik district

Submitted by: Tammy Vetsch

NA

Community of Residence: Naches

Madam Chairman and Board members

My name is Tammy Vetsch and I am a set net permit holder on the North Shore of the Egegik district. I am here to support proposal 80 which provides limited flexibility for small operations like mine and many others to operate more efficiently.

Quality of our product and safety for our operation would benefit from this proposal.

Thank you for your consideration,

Tammy Vetsch,

North Beach, Egegik district

PC256

Submitted by: Sam Volk

Community of Residence: Anchorage

2025-26 Bristol Bay Finfish Comments

#48. Support. This proposal takes what we have learned from management of the Naknek River Special Harvest Area and applies that knowledge to the new Kvichak River Special Harvest Area. Additionally, it has parts that would benefit both drift and set net fishermen.

#49. Oppose. This does not seem like it would support the gear type allocation goals.

#52. Support. Special Harvest Areas don't have to be used every season, if ever. But more tools at a biologist's disposal is a good thing.

#53. Oppose. We should not be modifying fishing districts to curb illegal fishing activity. We should be appealing for law enforcement (State Troopers) to extend their season. If you change boundary lines, it will just change the location where the illegal fishing is taking place, it will not stop people from "line fishing."

#54. Support.

#59. Support.

#60. Support.

#61. Oppose. This fodder proposal is obviously meant to take away from one user group and benefit another. Commercial fishermen have already borne the brunt of the Nushagak King Salmon management plan. The added language for sport fishermen "Retention of King Salmon may be limited if..." is a cop out as catch and release of King Salmon certainly still negatively affects their migration to the spawning grounds.

#62. Oppose. Again, another proposal aimed to curtail commercial fishing, so non-resident sport fishermen can continue business as normal. Unfair, and poor economics for the state.

#63. Support.

#64. Support.

#67. Support. Ideally, this proposal would help with the harm that catch and release fishing does to migrating King Salmon. It is also just a more sporting way to fish.

#68. Oppose.

#69. Oppose.

#70. Support. Ugashik deserves a level playing field with Egegik.

#75. Oppose. I oppose permit stacking in this fishery. The Bristol Bay drift fishery in particular is largely made up of non-residents with sources of income outside of the Alaska fishing industry. Those people with other (often substantial) sources of income would buy up dual permits, accelerating the outmigration of permits from rural, Alaskan residents.

#76. Oppose. For the same reason as #75.

#77. Cautiously Support. This is an interesting idea to help with fleet reduction (which I agree is necessary) that may not affect the ability for young fishermen to enter the fishery as much.

#78. Oppose. For the same reason as #75.

#82. Support.

#83. Oppose.

#84. Oppose.

#86. Support. Confusing language needs to be rectified so that enforcement can be consistent

#87. Support. Confusing language needs to be rectified so that enforcement can be consistent.

#88. Support.

#92. Oppose. Coho stocks are not currently being assessed, and therefore should not be a management factor. This is based on anecdotal evidence.

#93. Support.

#94. Support.

#95. Support.

PC257

Submitted by: Dagen Walton

Community of Residence: Kenai Peninsula

My name is Dagen Walton. I am a permit holder in Bristol Bay and own and operate the boat, F/V Turbo. I have been fishing in Bristol Bay since 1998 and am a 4th generation Bristol Bay commercial fisherman. I am also an owner of a fly fishing lodge in Bristol Bay with my family. I see the sides of this fishery from the commercial fisherman, lodge owner, and fly fishing guide's eyes.

I support proposals 45, 46, 47, 75, 76, 77, 78.

I do not support proposals 61, 62.

Madam Chair and Members of the Board,

My name is Harmony Wayner. I am a set-net crew member, subsistence user, and part of a sixth-generation Alaska Native fishing family on Naknek Beach in the Naknek–Kvichak District. I also work in fisheries science and management across the federal, academic, and nonprofit sectors. I hold a Bachelor of Science in Biology from the University of Alaska Southeast and a Master of Resource Management in Coastal and Marine Management from the University Centre of the Westfjords in Iceland. I submit this comment as an individual, not representing my employer or any affiliated organization, and as someone whose culture, livelihood, and family depend on a safe, fair, and sustainable Bristol Bay fishery.

Support for Proposals 45, 46, and 47

In recent years, run timing has become less predictable, and we have seen a significant portion of our catch arrive later in the season. In several seasons, July 10–18 has produced the largest harvest of our year. Extending the registration time for the drift fleet to enter the district would allow for more accurate escapement management during these later runs. It would also account for the reality that much of the drift fleet is returning to Naknek-based boatyards toward the end of the season. These proposals provide flexibility without compromising conservation goals.

Support for Proposal 80: Joint-Venture Set-Net Operations

I support Proposal 80, which allows limited joint-venture set-net operations under defined conditions. Joint ventures help small, family-based sites adapt to shorter openings, rising costs, and safety challenges without expanding fishing footprint or promoting consolidation. It often makes practical and economic sense for a family or small crew to operate multiple sites efficiently, particularly given tidal timing, delivery logistics, and the costs associated with maintaining high-quality fish. This approach has been successfully used in Kodiak set-net fisheries for over four decades and has proven to be both effective and sustainable.

Opposition to Proposal 50

I do not support Proposal 50. While fish quality is important, incorporating quality standards into commercial regulations for sockeye, similar to the herring fishery, does not reflect the realities of salmon set-net operations. Quality is heavily influenced by site-specific factors such as tides and individual operational practices. Quality improvements are best addressed through direct communication between fishermen and processors rather than through state regulation.

Opposition to Proposal 92

I do not support Proposal 92. A fixed deadline of July 25 for the closure of all commercial fisheries would be harmful to local people who depend on later-season fishing. By that date the 25th of July, most of the external (non-local) fleet has already pulled up anyway. Implementing a date-based closure ignores the increasing variability in run timing we have experienced in recent decades. From my experience as a set netter, bycatch of other salmon

species and trout late in the season is very limited. Management should remain responsive to actual run conditions rather than rigid calendar deadlines.

Opposition to Proposal 105, 185 and King Salmon Management Measures

I do not support Proposals 105 or 185 at this time. Before adopting a new Bristol Bay King Salmon Management Plan, particularly one specific to the Naknek River, or implementing significant fishing restrictions, accurate and comprehensive data supported by meaningful enumeration measures are needed. In my experience as a set-netter, king salmon bycatch is limited relative to our harvest, which is approximately 99 percent sockeye, especially during peak sockeye run timing. King salmon also tend to migrate earlier and at greater depths, further reducing interactions with set-net gear later in the season.

Severe restrictions on fishing time would likely result in over escapement of sockeye salmon, creating additional management challenges, reducing overall harvest value, and economic outcomes for our community. Set-net operations also face logistical constraints in deploying and retrieving gear, particularly when compared to the drift fleet's greater mobility and use of hydraulic reels. Implementing restrictions on set-netters without robust monitoring and reliable data would disproportionately impact fishermen, their livelihoods, and the communities that depend on them.

I strongly urge the Board to prioritize improved king salmon monitoring and data collection before imposing additional restrictions on commercial fisheries. I also support the development of a strong, stakeholder-driven process or task force that includes representation from all user groups and managers. Achieving collective buy-in is essential if we are to move forward in a fair and effective manner, one that reduces conflict among user groups and instead focuses on the shared conservation outcomes we all want for the Naknek River and its king salmon.

Respectfully,
Harmony Wayner

Submitted by: Reise Wayner

Community of Residence: Naknek Alaska

Hello board of fish,

My name is Reise Wayner, I am a lifelong Alaskan, and have fished Setnet in Bristol bay for 20 years. My family has been fishing in the same spot on the beach for 5 generations.

I am thankful to be able to share my opinions with you and others. My goal is for the Bristol bay fishery to be around far after I am gone.

Oppose - Proposal 49.

I believe that there should an equal split, 1:1, between Setnet openings and drift openings.

With am and pm tides switching every other day. Sometimes the evening tides are better and sometimes am, but in the 3 to one split, we fished at night during the weak tide in 2014. Our season was shot.

Equal fishing opportunities is the point.

Oppose - Proposal 61

Limiting commercial operations post June 28 because of king escapement will further harm the king salmon stock. When sockeye overescape there is less habitat for kings. A healthy harvest of sockeye salmon allow the kings to have more habitat to spawn. The more finns you have, the less space you have.

Support - Proposal 80

Joint - venturing for settnetters is an essential part of working together as a family. Our family has worked together and our two permits represent 4 generations of cooperation. It makes settnetting economical and family oriented. This proposal would make allowable what has been working for generations.

Oppose - Proposal 105

I am not against responsible management, but I am against king escapement dictating sockeye openings.

King salmon run early, count them early, but do not hinder the sockeye fishery as this would also harm the king escapement.

If sockeye overescape there is less room for king salmon to spawn.

Thank you for your consideration of my opinions.

Respectfully,

Reise Wayner.

Submitted by: Marcus Weiner

Fish Alaska magazine

Community of Residence: Battle Ground, WA

We support Proposal 102. Allowing the use of bait earlier will allow more sport fishermen to catch sockeye without lining them. This is better for the sockeye fishery. Since most kings spawn above the Pongo, it also makes sense to allow sport anglers to fish for kings up river as far as the Pongo.

Submitted by: Christopher Widing

Community of Residence: Washington

As a Bristol Bay commercial fisherman of 18 years i feel that everyone who participates in this fishery should be heard, and everyones voice should count considering it effects us all not just watershed residents. My issue with proposal 45 is it specifically targets one specific district without addressing issues that could be present in other districts. a better solution might be to allow an extension only if escapement has not been reached. The issue i have specifically with proposal 49 is it does nothing to address how the allocations to gear sets would be caught. If there are only 200 boats fishing the krsha than how do they expect the allocation to stay at a approx 80/20 percent split if it goes one drift to one set opener. my issue with proposal 50 stems from trying to use the ADF&G to do what markets should truly be doing and pushing for better quality in there own ways with incentive, not making it a legal issue for poor quality. It also seems something very hard to enforce and to what end? My issue with proposal 52 is that it seems to be trying to stop overescapement in a poor way, the better use of this would be to allow for longer fishing periods on one tide a day which would allow for better managment. My issue with proposal 61 is it seems to do detrimental harm to the commercial fleet by basing something on a specific date for something that can have a huge swing year to year. Proposal 63 seems to state one thing than propose an entirely different idea. It states that larger fish are more vital to breeding stocks than suggests that a limit on them be entirely removed and no closures which goes against the very thing it states. Proposals 71-74 are showing the overwhelming support for allowing a general district to allow fisherman to continue to fish. the amount of illegal activity at the district lines has gotten out of hand in recent years and seems to benefit a very small group who "bully" many of the rest of the fleet into quitting for the season due to chance of either catching nothing or possibly getting caught fishing out of district. Changing to a general district would benefit many greatly at only the cost to those who were fishing illegally in the first place. The only downside would be reporting numbers, but by this point in the season the counting towers are wrapping up and a lot of the data becomes generalized anyways. Proposal 88 brings up a good point of the issue with anchor rollers. why that seems to be a necessary thing that is defined past the 32' seems unnecessary. the problem comes down to current anchor design which requires a longer anchor roller design in order to not do damage to the bow of the vessel. The spirit of the regulation needs revisiting in order to correctly correlate with the current state of vessels and anchor requirements and needs to also take safety of anchor equipment and retrieval of said anchor onboard. Proposal 89 seems to just take a different stand on the same issue and seems to be a good middle ground.

Submitted by: Nolan Willis

Community of Residence: Eagle River, AK

My name is Nolan Willis. I am a current resident of Eagle River, Alaska, and a former resident of Bristol Bay (Naknek and Dillingham). I hold a Bristol Bay permit and have been fishing in the region for nearly

three decades, mostly in the Nushagak District. Most of that time has been spent on the F/V Red Zone, though I have also operated the Rip Runner and the Sabotage. Over the years, I have witnessed both the rises and declines of the sockeye fishery, as well as the ongoing long-term decline of Chinook salmon. I have reviewed the BBSRI performance assessment of the current management plan and the related recommendations from ADF&G biologist Tim Sands (Nushagak River Chinook Salmon Stock Status, 2023–2025).

There are two critical considerations in Chinook conservation:

- The reality of Chinook escapement goals.
- The reality of managing the sockeye fishery.

We cannot simultaneously meet the current Chinook escapement goals and manage the sockeye fishery effectively. If the wrong balance is struck, we risk damaging the sockeye fishery while achieving minimal benefit for Chinook.

Tim Sands' report makes clear that Nushagak Chinook are not biologically endangered but are experiencing a long-term decline consistent with statewide trends. In several recent years, even with zero Chinook harvest, the stock could not have met the 95,000-fish in-river goal, which was set during a period of higher productivity. Recent escapement has hovered near the lower bound of the sustainable escapement goal (55,000 fish), once assessment uncertainty is considered. For this reason, the department recommends using the lower bound of the SEG as the metric for removing the stock from "management concern" status and suggests the Board revisit whether the current in-river goal remains appropriate under today's productivity conditions.

The Performance Assessment of the 2023 Nushagak District King Salmon Stock of Concern Management Plan highlights several important points. Developed over five years (2018–2023) through a stakeholder-driven process involving biologists and representatives from commercial, sport, and subsistence fisheries, the plan has functioned as intended in its first three years. It has delayed openings, reduced fishing time, and allowed more Chinook and sockeye to pass upriver before harvest exposure. However, Chinook escapement goals have not yet been met due to continued low production. Because Chinook lifecycles span 4–7 years, three seasons of implementation are insufficient to evaluate long-term outcomes. The plan must remain in effect for several more years to assess its effectiveness. Importantly, the plan does not sacrifice the health of the sockeye fishery; its triggers allow commercial sockeye fishing to begin before June 28 when escapement goals for the Nushagak and Wood Rivers are met.

By contrast, proposals 61 and 62 undermine the goals of the current management plan. They attempt to codify a June 28 start date and restrict fishing time until July 4, eliminating flexibility to adjust based on sockeye escapement. This is problematic because the sockeye run typically escalates rapidly in late June and peaks in early July. Rigid restrictions risk over-escapement in the Nushagak and Wood Rivers by millions of fish—far beyond what those systems can biologically support—while reducing harvest opportunities and inflicting significant economic harm on commercial fishermen.

Proposals 63–68 are less severe, either because they do not directly impact the sockeye fishery or because they seek to ease frustrations with the current plan—for example, by permitting fishing in the Wood River before escapement triggers are met or by adjusting metrics without codifying fixed fishing times into law. Even so, these proposals remain premature. The management plan has not been in place long enough to evaluate its effectiveness, and any adjustments should be deferred until more data is available.

Proposal 44 raises practical concerns. It would impose a fixed numerical limit on home-pack Chinook for both commercial and sport users. For commercial fishermen, however, this restriction would not reduce harvest. Any Chinook caught incidentally in sockeye gear must already be retained and either delivered or consumed, and only a small number are ever kept as true home pack—often cooked and eaten onboard early in the season. Limiting home pack therefore adds regulatory burden without producing conservation benefit. Commercial and sport fisheries operate under fundamentally different conditions, and applying a uniform limit across both sectors ignores those differences. Proposal 44 does not advance Chinook conservation and instead creates unnecessary regulation without measurable biological gain.

In summary: Chinook productivity is down for reasons not yet fully understood. The best available data does not implicate commercial fishermen, as Chinook are failing to return in sufficient numbers regardless of harvest activity. In my experience, we rarely catch more than a handful of Chinook during any opener, and often none at all. No current conservation proposal will meaningfully restore Chinook numbers to historic baselines, and at least two proposals (61 & 62) would harm the sockeye fishery for negligible Chinook gains. The remaining proposals are premature, misguided, or politically motivated. The most prudent course is to allow the current management plan to run its course and reassess beginning with the 2027 salmon season. If Chinook returns improve between 2027 and 2030, we will have a clearer picture of the plan's effectiveness.

December 27, 2025

To The Alaska State Board of Fisheries Members:

My name is Victor Willis and currently reside in Eagle River, Alaska. I have spent most of my life as a resident of Bristol Bay (residing in Egegik, Naknek and Dillingham). I currently hold a Bristol Bay drift permit and have been fishing in the Bristol Bay region since 1968. Most of my fishing tenure has been in the Nushagak District on the F/V Red Zone.

Over the past five decades, I've witnessed significant changes in the Bristol Bay fishery, including the migration from manually operated wooden skiffs and double-ender-conversions to modern aluminum and fiberglass, technically advanced fishing vessels. Along with these equipment changes and district management strategies with sustainability at the forefront, fisheries management plans have become much more sophisticated, affecting both gear types including the institution of salmon allocations between those gear types. Probably the most profound change has been the downturn of the King Salmon run over the past three decades. Evidence indicates this is not solely a Nushagak District issue but has been confirmed to be a state-wide problem. As a result, fishermen went from participating in commercial King Salmon openings in the 1970s, 80s and 90s to commercial King Salmon fishing closures altogether over the past twenty-five or so years because of the significant King Salmon stock decline.

In light of the current Bristol Bay fishery proposals under consideration, I reviewed the following reports:

- 1) The Bristol Bay Science & Research Institute (BBSRI) Stock Of Concern (SOC) Management Plan adopted by the Board Of Fish (BOF) in March of 2023.
- 2) The performance of the SOC Management Plan over the past three seasons (2023–2025).
- 3) The assessment of the current SOC Management Plan.

The assessment of the SOC Management Plan includes the four key findings below:

- 1) The SOC Management Plan consistently delayed the start of the commercial fishing season by 2–5 days compared with the previous management structure.
- 2) Delayed openings resulting from the new commercial start triggers allowed an additional 6,500–10,800 king salmon to pass through the district before exposure to harvest annually.
- 3) The Optimal Escapement Goals (OEGs) enabled longer in-season closure windows, reducing harvest pressure and allowing more king salmon to migrate upriver.
- 4) Combined, the start triggers and OEG-driven fishing breaks resulted in an average reduction of roughly 240 commercial fishing hours per year, prior to July 5th—about a 42% decrease in commercial fishing time from the previous management structure.

With the foregoing in mind, I strongly oppose Proposals 44 and 61 through 68 inclusively for the reasons stated below:

- 1) While there is a state-wide downturn in King Salmon populations, I would not characterize the Nushagak King Salmon run as endangered. Rather, most—if not all—Alaska river systems are experiencing a long-term decline consistent with statewide trends. Hence, the reduced population of King Salmon returning to the Nushagak River can no longer support a required minimum in-river escapement goal of 95,000 Kings, as achieved a few decades ago with much healthier King Salmon runs occurring at that time. Consequently, in the interim, the escapement goal of 95,000 Kings needs to be adjusted downward to a realistic number to reflect the overall decline of the King Salmon populations while new strategies to mitigate the declining King Salmon fishery are developed.
- 2) Attempting to achieve an in-river goal of 95,000 Kings during plummeting King Salmon populations by closing the Sockeye Salmon fishery longer will not guarantee the restoration of the King Salmon runs. Fundamentally, the cause(s) of this downturn have not been accurately and completely identified. Many theories have been discussed without any definitive evidence or specific causes. Attempting to achieve an in-river escapement goal of 95,000 King Salmon in the Nushagak River at the expense of the Sockeye Salmon fishery—through continued reductions in fishing time—will only guarantee a significant loss of revenue for fishers. At the same time, it risks the collapse of Sockeye Salmon runs due to inevitable over-escapement.
- 3) Recent King Salmon escapement has hovered near and slightly below the lower bound of the Sustainable Escapement Goal (SEG) of 55,000 kings over the last several years. For this reason, the Alaska Department of Fish & Game recommends using the lower bound of the SEG as the metric for removing the stock from “management concern” status and suggests the Board of Fish revisit whether the current in-river goal of 95,000 Kings remains the appropriate number under today’s productivity conditions.
- 4) The Performance Assessment of the 2023 Nushagak District King Salmon Stock of Concern Management Plan highlights several important points. Developed over five years (2018–2023) through a stakeholder-driven process involving biologists and representatives from commercial, sport, and subsistence fisheries, the plan has functioned as intended in its first three years. It has delayed openings, reduced fishing time, and allowed more King Salmon and Sockeye Salmon to pass upriver before commercial harvesting. Unfortunately, King Salmon escapement goals have STILL not yet been achieved because of continued low returns. Since King Salmon lifecycles span 4–7 years, just three seasons of implementation and data collection are insufficient to evaluate long-term outcomes. Therefore, the current SOC Management Plan must remain in effect for several more years to accurately assess its effectiveness. Most importantly, the existing SOC Management Plan does not sacrifice the health of the Sockeye Salmon fishery by risking severe over-escapement. To avoid Sockeye Salmon over-escapement this Plan has built-in triggers that allow commercial Sockeye Salmon fishing to begin well before June 28, only after escapement triggers for both the Nushagak and Wood Rivers are met. Simply put, we need to follow the existing SOC Management Plan to its final intended conclusion.
- 5) Until the actual causes of the statewide decline in King Salmon runs are identified, imposing drastic measures on river systems would be imprudent. Such actions could do more harm than good—particularly by jeopardizing Sockeye Salmon runs in the effort to

improve King Salmon numbers. Because the reasons for the continued decline in King Salmon runs remain unclear, investigating all possible contributing factors is essential. Efforts should avoid defaulting to simple explanations—such as blaming climate change or Bristol Bay fishermen—while overlooking other potential causes that may be less convenient to address. To date, there are lingering questions concerning the impact of high-seas bycatch from other fishery groups, namely trawlers, and we are not satisfied with any policy that ignores their potential impacts while threatening our fishery.

- 6) **Proposal 44** would do very little to mitigate the existing low King Salmon runs and would result in an administrative/regulatory nightmare with low propensity for enforcement for all sport, subsistence, and commercial fishing groups. For commercial fishing groups, this restriction would not reduce harvest because any incidental King Salmon caught in commercial Sockeye Salmon gear must be retained for subsistence or delivered/sold to the fish company's tender. Currently, most incidental King Salmon catch is sold. Since commercial and sport fishers operate under different regulations and conditions, the application of a uniform daily catch limit for both user groups ignores those differences. Ultimately, Proposal 44 does not advance King Salmon conservation but instead creates unnecessary and onerous regulations that would likely be unenforceable while not creating any biological improvement. Moreover, the nature and tone of Proposal 44 appears to be politically motivated.
- 7) **Proposals 61 and 62** undermine the goals of the current SOC Management Plan. They attempt to codify a June 28 commercial fishing start date and additionally restrict fishing time until July 4, eliminating the fishery manager's flexibility to adjust commercial openings based on Sockeye Salmon escapement. This is problematic because the Sockeye Salmon run typically escalates rapidly in late June and peaks in early July. Fishery management restrictions this drastic will inevitably risk severe over-escapement in both the Nushagak and Wood Rivers by millions of fish while significantly reducing harvest opportunities and inflicting economic harm on commercial fishermen and the local communities.
- 8) **Proposals 63, 64, 65, 66, 67 and 68** are less severe and potentially less devastating than Proposals 61 and 62 because they do not directly impact the Sockeye Salmon fishery and appear to mitigate frustrations with the current plan by maximizing harvest opportunities in the Wood River Special Harvest Area (WRSHA) without codifying fixed fishing times into law. Nonetheless, Proposals 63 through 68 are premature since the existing SOC Management Plan for Nushagak King Salmon has not been in place long enough to evaluate its effectiveness, and any adjustments should be deferred until more data is available.

In summary, King Salmon run declines are a state-wide problem, and the cause(s) are not fully understood at this time. The data collected in Bristol Bay for the Nushagak District does not implicate the commercial fishing fleet as the reason for the decline. Notably, King Salmon populations are declining in most river systems all over Alaska, regardless of commercial harvest activity, yet the proposals described above seem to come from an assumption that commercial fishermen are to blame for the decline and should be throttled back to less fishing time accordingly. During commercial fishing over the past decade, I seldom caught more than a handful of tiny "Jack" kings during any opener and mostly caught none. None of the current proposals going before the Fish Board in 2026 will meaningfully restore King Salmon numbers to historic baselines, and at least two of the proposals could devastate the Sockeye Salmon fishery within a few seasons by over-escaping the supporting river systems.

With the foregoing in mind, I strongly oppose Proposal 44 and Proposals 61 through 68 inclusively. If we want to restore King Salmon runs to historic norms, we need to dedicate efforts and resources toward understanding the fundamental reason(s) why King Salmon runs are declining. We fishermen are as concerned about this as anyone, but we are deeply troubled by the lack of scientific answers, the lack of due diligence to get scientific answers, and the ever-present tendency to regulate our Sockeye Salmon fishery to adverse degrees in the absence of scientific answers.

Thank you for your consideration,

Sincerely,

A handwritten signature in cursive script that reads "Victor Willis".

Victor Willis

Owner/Operator F/V Red Zone

Submitted by: Adam Wilson

Community of Residence: Bellingham, Washington

Delaying Nushagak drift gillnet commercial fishing opens risks excessive sockeye escapement, which can negatively impact the long-term health of the run through density-dependent effects on spawning and rearing habitat. Conservation responsibility should not fall disproportionately on the commercial gillnet fleet, particularly when over-escapement poses its own biological risks. Before implementing drastic restrictions on commercial fisheries, managers should also address impacts from other user groups. This includes evaluating unlimited catch-and-release practices, bag limits, and cumulative environmental impacts from sport fishing pressure on spawning streams. A balanced, ecosystem-based approach to conservation requires shared responsibility across all fisheries targeting the resource.

Submitted by: Jake Wilson

Community of Residence: Naknek

Proposal 92 is completely out of line and not based on any hard data. Observations from a couple of guys “double dipping” by simultaneously participating in both commercial and sport fishing operations should not hold any weight when regulation changes are being considered. The vast majority of the Naknek commercial gillnet fleet still fishing after July 25th is comprised of local watershed residents who don’t own high end guide businesses to help supplement their income.

Also, there has been a major shift in the gear size being used by the commercial fleet in recent years. Most of the web in the water these days is sub 5” which is obviously not ideal for catching larger bodied silver salmon. I commercially fish the Naknek/Kvichak district into August most years and I can count the number of silvers I catch each season on two hands. I would venture to say that the impact the commercial sockeye fishery has on the silver salmon stocks is minor if not completely negligible.

On top of all that, the uptick in the number of guide operations and lodges on the Naknek in recent years is staggering. I’m a local hobbyist sport fisherman myself and the increase in pressure put on the fish by these outfits is obvious. If any regulation changes need to be implemented, they should be aimed at shortened seasons, decreases in bag limits, and gear restrictions for non resident guides and clients, not taking away economic opportunities for local people.

Submitted by: Joseph Wilson

Community of Residence: out of state

Subject: Written Testimony – Board of Fisheries Proposals

Dear Members of the Alaska Board of Fisheries,

My name is Joseph Wilson. I am a Bristol Bay set net fisherman and permit holder submitting written testimony on the referenced proposals.

I oppose Proposals 44 and 61–68 to the extent that they would modify the Nushagak District King Salmon Stock of Concern (SOC) Management Plan.

The SOC plan was developed through a multi-year, stakeholder-driven process involving commercial, subsistence, and sport users, Advisory Committees, and the Alaska Department of Fish and Game. It has been in place for only three seasons and was not expected to produce immediate biological recovery given the 4–7 year Chinook life cycle.

Available analyses indicate the plan is functioning as intended by delaying openings, reducing fishing time during peak Chinook vulnerability, lowering commercial exploitation, and increasing escapement.

I respectfully request the Board allow the plan to remain unchanged and be evaluated over a full Chinook generation.

Sincerely,

Joe Wilson

PC267

Submitted by: Kevin Wilson

Community of Residence: Tacoma, WA

Dear Members of the Alaska Board of Fisheries,

My name is Kevin Wilson, I am a drift gillnet fisherman, vessel and permit owner in Bristol Bay and I am submitting written testimony regarding the following proposals.

I oppose Proposals 44 and 61–68 to the extent that they would modify the Nushagak District King Salmon Stock of Concern Management Plan.

The SOC plan was developed through a multi-year, stakeholder-driven committee process involving commercial, subsistence, and sport users, Advisory Committees, and the Alaska Department of Fish and Game.

The plan has only been in place for three fishing seasons and was not expected to produce immediate biological recovery given the 4–7 year life cycle of Chinook salmon.

Available analyses indicate the plan is functioning as intended by delaying commercial openings, reducing fishing time during peak Chinook vulnerability, reducing exploitation of king salmon in the commercial fishery, and increasing escapement prior to harvest exposure.

I respectfully request the Board allow the plan to remain unchanged and be evaluated over a full Chinook generation.

I also believe that the Board should consider the proposals for an open district after each river system achieves its escapement goals. The inability of the state to provide enforcement after mid-July creates a system that heavily rewards illegal fishing. If the boundary cannot be enforced than it should be opened. I support proposals 71 and 72.

Sincerely,

Kevin Wilson

F/V Miss Malerie

PC268

Submitted by: Grant Wooldridge

Wooldridge Boats

Community of Residence: Washington

Per proposal 102

1. Allow bait on the Togiak July 11 instead of July 16 (5 days earlier)
2. Move the upper boundary for targeting king salmon from the Geciak River to the Pongo River

PC269

Submitted by: Holly Wysocki

Community of Residence: Dillingham

I'm writing to oppose Proposals 44, 61-68 commercial fishing is the only way I could afford to live in Dillingham. Please do not approve this proposal we need to fish to make a living.

PC270

Submitted by: Mallory Zharoff

Community of Residence: King Salmon

I am in opposition to proposal 52. I am a set net fisherman in Egegik for over 20 years and I do not agree with the proposal 52. This will give unfair advantage to a select few fishermen within the boundary they have given.
